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**To:** [ARB Clerk of the Board](#)  
**Subject:** Comment to aircleaner2019  
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Intertek has reviewed the proposed modification in appendix A and is positioned to provide support to manufacturers with testing, should the proposed regulation order be approved.

With the proposed greater than 240 nm wavelength exception (UVGI), Intertek requests consideration of alignment with UL 507, section 223.1 requirement. UL 507 clause 223.1 requires "lamps emitting ultraviolet radiation generating wavelengths less than 250 nm shall comply with the ozone test requirements of the Standard for Electrostatic Air Cleaners, UL 867, Sections 40 and 41."

Intertek is accredited for evaluating products to CSA C 22.2 No. 187. We are working toward approval of a subcontract lab for additional testing capabilities.

Regarding § 94804. Certification Requirements, paragraph (b), the intent of the following is unclear. "...the owner's or operations manual must state that replacement lamp(s) must be UVGI, as defined in Section 94801(a)(38), or the device will no longer be CARB compliant, as it may produce harmful ozone."

Text to be included in the manual requires clarification.

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