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**To:** [Lum, Susan@ARB](mailto:Lum.Susan@ARB)  
**Cc:** [Jim Gundersen](#); [John Hargrove](#); [Marci Surpin](#)  
**Subject:** Comment on air cleaner regulations  
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Comment on regulations regarding air cleaners,

As an air pollution chemist it is clear to me that your proposed regulations to avoid the emissions of ozone from air cleaners are needed to protect the public. An additional valuable requirement would be to evaluate the efficiency of the air cleaners for reduction of NO<sub>x</sub>, SO<sub>x</sub>, Ozone, hydrocarbons, and PM 2.5. We need to make sure these cleaners are both effective at reduction and do not increase other pollutants in addition to the risk of ozone production. For example an ozone generator followed by an ozone scrubber could easily produce NO<sub>x</sub> or PM 2.5 and have a net detrimental effect, and if little or no benefit is gained from the device then the energy waste and consumer expense is not only unjustified, but the device is potentially harmful if trusted to reduce pollution.

We have two forms of air and exhaust cleaner in development at Activated Light Technology Industries, one active and one passive. It would be of great value to be able to say that the performance of both has been verified by CARB, and it would be worth the additional cost of testing.

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