

Subject: Comment on Air Purifier Regulations
From: Spence Davis <sdavis@lightningair.com>
Date: Tue, 09 Jan 2007 20:52:49 -0500
To: aircleaners@listserv.arb.ca.gov

Ms. Peggy L. Jenkins
California Air Resources Board
Research Division, Fifth Floor
1001 I Street, P.O. Box 2815
Sacramento, CA 95814

Dear Ms. Jenkins,

I am associated with SpringCo Manufacturing and appreciate the opportunity to comment on the upcoming regulations that relate to air purifiers that produce ozone. SpringCo has been in the business of manufacturing and distributing air purifiers from 2000 to the present time.

Since the beginning, warning labels have always been placed directly on our air purifiers. We have also placed warnings in the User Guide and cautionary information in other materials. SpringCo has received many testimonials and endorsements from users of our product and not experienced problems with consumers being overexposed to ozone.

In 2005, SpringCo began to transfer the manufacturing of our product in China and make design modifications to it. As a result of the negative publicity that generated concerns about ozone, we also modified our labeling to recommend that the O3 Sanitizer on our unit be used primarily in unoccupied spaces. Attached you will find a label (sticker) in a vertical format with the word "LightningAir" at the top. This is the label that was used in production through the end of 2006.

For production beginning in 2007, we have further modified the wording of our labeling to make it clear that O3 Sanitizer is for use in unoccupied spaces. Attached you will find a label (revised sticker) in a horizontal format with the words "Read Carefully" at the top. We will also be modifying the User Guide and marketing materials as well.

The other photographs show the location where the sticker is in placed on the back the unit. Another shows the notification on the front of the unit next to the controls to "Use as Directed-See Label on Back".

We have always believed that proper labeling is important and the key to consumer safety. Almost any liquid, solid or gas can be hazardous if used improperly. Ozone is employed in many beneficial ways but consumers need to be made aware of how to use it safely.

Thank you for your consideration of this information and I hope you find it helpful in implementing the regulations. If I can be of any assistance, please feel free to contact me at any time.

Best regards,

Spence Davis
President

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Thomasville, GA 31792
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OLD

NEW

LightningAir

Normal Operation: Turn the Ionization dial on and select fan speed. The unit should be located at least two to three feet off the floor and at least three feet away from sitting and sleeping areas.

Sanitizer Mode: The O₃ Sanitizer is most effective in unoccupied spaces to eliminate odors and significantly reduce mold and mildew. Close all doors and windows in the space to be treated. Turn Sanitizer dial on and select square feet setting. Vacate the space for 1 to 4 hours depending upon the severity of the odors. Return to space, turn Sanitizer dial off, open doors and outside windows until sanitizing smell is gone. See User Guide.

Warning: Excess ozone (O₃) concentrations can cause mucous membrane and respiratory irritation. If you detect the sanitizing smell when you walk into the room turn the Sanitizer dial off or down to a lower level. See User Guide.

Serial No. LO305 000128
Model No. LA-2SP-11-US
Cherry

SpringCo Manufacturing
Tallahassee, FL 32309
Made in China

Read Carefully

Normal Operation: Turn the Ionization dial on and select fan speed. The unit should be located at least two to three feet off the floor and at least three feet away from sitting and sleeping areas.

Sanitizer Mode: The O₃ Sanitizer is for use in unoccupied spaces to eliminate odors and significantly reduce mold and mildew. Close all doors and windows in the space to be treated. Turn Sanitizer dial on and select square feet setting. Vacate the space for 1 to 4 hours depending upon the severity of the odors. Return to space, turn Sanitizer dial off, open doors and outside windows until sanitizing smell is gone. See User Guide.

Warning: Excess ozone (O₃) concentrations can cause mucous membrane and respiratory irritation. If you detect the sanitizing smell when you walk into the room turn the Sanitizer dial off and ventilate the area.

Serial No. LO305 000128 **CHERRY** Model No. LA-2SPX-11-US

SpringCo Manufacturing • Thomasville, GA 31792 • Made in China

BACK

FRONT

