



Shaping Tomorrow's
Built Environment Today

April 22, 2022

The Honorable James A. Cox, Jr.
Chair
Committee on Labor and Industry
Pennsylvania House of Representatives
501 North Third Street
Harrisburg, PA 17120

Letter sent via email to: jcox@pahousegop.com

Re: HB 2079, *Amendments to the Pennsylvania Construction Code Act*

Dear Chair Cox and Committee Members:

The Pennsylvania Chapters of ASHRAE are writing to you in support of the inclusion of substitute refrigerants in House Bill 2079, "*Amendments to the Pennsylvania Construction Code Act*". HB 2079 clarifies that building codes in the State of Pennsylvania cannot prohibit the use of an acceptable substitute refrigerant, as determined by the United States Environmental Protection Agency (EPA), so long as equipment is installed in accordance with the use conditions imposed by EPA. By deferring to EPA's listing process, the legislation will allow manufacturers to adhere to the most recent editions of ASHRAE standards concerning classification and the safe use of refrigerants in heating, air-conditioning, and refrigeration equipment.

ASHRAE, founded in 1894, is a technical and professional society of more than 50,000 members, including over 1,800 in Pennsylvania, that focus on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

As previously mentioned, when the EPA accepts a substitute refrigerant, the use conditions result in an alignment of building codes with the most recent edition of ASHRAE refrigerant standards. This is a critical step towards ensuring that new substitute refrigerants are used safely. ASHRAE Standard 15-2019, *Safety Standard for Refrigeration Systems*, specifies the safe design, construction, installation, and operation of refrigeration systems. It applies to mechanical and absorption refrigeration systems; to modifications including replacement of parts or components; and to substitutions of refrigerant with a different number designation. Standard 15-2019 is used in conjunction with ANSI/ASHRAE Standard 34-2019. ASHRAE Standard 34-2019, *Designation and Safety Classification of Refrigerants*, specifies refrigerant properties and a refrigerant classification system. It assigns safety classifications and refrigerant concentration limits based on toxicity and flammability data.

This federally mandated refrigerant transition will have a significant impact on the type of equipment available for the heating and cooling of buildings. It is essential that the state building code align with the latest versions of ASHRAE Standards 15 and 34. This will prevent confusion among building inspectors and avoid costly equipment shortages and construction delays.

Again, we appreciate your consideration of ASHRAE comments regarding HB 2079. Ensuring the safe use of refrigerants and adhering to the most up-to-date ASHRAE standards will enable a smooth transition in refrigerant use and result in a more sustainable built environment. If you have any questions or need additional information, please feel free to contact GovAffairs@ashrae.org. Thank you for your work to improve refrigerant safety and improve the lives of Pennsylvania residents.

Sincerely,



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