



Shaping Tomorrow's
Built Environment Today

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2020-2021 ASHRAE President

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August 4, 2020

Ms. Elizabeth Scheehle
Research Division Chief
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Letter Sent Via Email to HFCReduction@arb.ca.gov

RE: CARB Proposed Regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses*

Dear Chief Scheehle:

ASHRAE is providing the following comments on the proposed regulation, “*Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses.*” ASHRAE supports the orderly and safe phasedown of high-global warming potential (GWP) hydrofluorocarbon (HFC) refrigerants. As California commits to the phasedown of high-GWP HFCs, ASHRAE wants to ensure safety standards are concurrently incorporated into building codes. Specifically, ASHRAE Standard 15-2019, *Safety Standard for Refrigeration Systems*, and ASHRAE Standard 34-2019, *Designation and Classification of Refrigerants*, need to be adopted by California to help ensure a safe refrigerant transition.

As ozone-depleting CFCs and HCFCs have largely been replaced with hydrofluorocarbons (HFCs), some have high global warming potential (GWP) and are being restricted as the world deals with global climate change. Recently, fluorinated alternatives referred to as hydrofluoroolefins (HFOs) have been introduced. They have zero ozone-depleting potential (ODP) and very low GWP, but some of them are mildly flammable. There are also blends (mixtures of different HFCs & HFOs from the same or different class/group) that are available as transitional or long-term solutions with different flammability and GWP value characteristics. ASHRAE’s standards for the classification and safe use of refrigerants were updated in 2019 to address these new types of refrigerants. However, the state of California has not yet updated its building codes with these updated standards. If the standards are not adopted by California in a timely fashion, the state should consider making adjustments to its phase-down schedule.

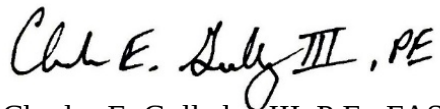
Ms. Elizabeth Scheehle

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Thank you for your work on this regulatory proposal. We welcome the opportunity to answer questions regarding ASHRAE Standards 15 and 34, or any other concerns or questions about refrigerants and their safe use. Please contact me or have your staff contact GovAffairs@ashrae.org with any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Ch E. Gulledge III, PE". The signature is written in a cursive, flowing style.

Charles E. Gulledge III, P.E., FASHRAE, HBDP, LEED AP
2020-21 ASHRAE President