First Public Review Draft of BSR/ASHRAE Proposed Addendum c to ANSI/ASHRAE Standard 15-2019, Safety Standard for Refrigeration Systems

Modification of Section 7.5.1.2 Corridors and Lobbies

The Environmental Investigation Agency (EIA) appreciates this opportunity to comment on the First Public Review Draft of Proposed Addendum c to ANSI/ASHRAE Standard 15-2019. EIA is an independent environmental campaigning organization based in Washington D.C., working worldwide to protect the global climate, forests and threatened species with intelligence, for the benefit of people and wildlife. We have been closely involved in the international ozone and climate negotiations for more than two decades and participate on various relevant safety standards bodies including Underwriters Laboratories (UL) standards technical panels for UL 60335-2-40 and UL 50335-2-89.

It is the recommendation of EIA that a revised proposal be developed to allow for >3xLFL for *self-contained equipment listed under UL 60335-2-89 only*, provided equipment passes Annex CC and is installed in accordance with the minimum room size requirement labelled on the equipment, as will be required by the listing. We have included below a specific suggested language change to the current proposal to reflect our recommendation.

The current proposal to revise Addendum C represents a step forward for allowing safe use of many types of equipment using hydrocarbons in these spaces, but could unnecessarily restrict use of other safe listed refrigeration equipment, as it does not reflect the updated safety requirements being developed by CANENA THC 61C WG12. WG12 is currently working to adopt additional safety measures and updated charge size requirements for use of Class 2L, 2, and 3 flammable refrigerants under the UL 60335-2-89 listing for refrigeration equipment covered by this clause. Additionally, there is a parallel AHRI committee working on a proposal with associated changes to ASHRAE 15. Updated safety requirements for self-contained refrigeration equipment under UL 60335-2-89 will incorporate additional safety testing and installation requirements for minimum room size that will enable safe use of equipment using more than 3 x LFL.

Therefore, Addendum c should be revised to allow for >3 x LFL for self-contained equipment listed under UL 60335-2-89 provided that the equipment passes Annex CC testing and is installed in accordance with minimum room size requirements.

Propose changes to Addendum c proposal language:

7.5.1.2

Corridors* and *Lobbies. *Refrigerating Refrigeration systems* installed in a public *corridor* or *lobby shall* comply with the following:

1. *Refrigeration systems shall* be limited to *unit systems*.
2. The *refrigerant* charge *shall* be limited based on the *RCL*, as specified in Section 7.2.

   Section 7.2, Exception 1 for 6.6 lb (3 kg) of *refrigerant* in *listed* equipment *shall not* apply to *refrigeration systems* in a public *corridor* or *lobby*.

3. *Refrigeration systems* containing Class 2L, 2, or 3 refrigerants *shall* be *listed*, and the *refrigerant* charge *shall* be limited for each *unit system*, calculated in accordance with the following equation:

   $m_{max} = 0.106 \times LFL$ (I-P)

   $m_{max} = 3 \times LFL$ (SI)

   except that self-contained refrigeration systems listed in accordance with UL 60335-2-89 currently being updated by CANENA WG 12, having passed an Annex CC test and provided that the corridor or lobby allows the equipment to be installed in accordance with minimum room size requirements.

m_{max} = 13 X LFL, subject to restrictions **under Section 7.5.3**

Thank you for consideration of these suggested changes to the proposal.

Sincerely,



Christina Starr
On behalf of Environmental Investigation Agency
www.eia-global.org