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Built Environment Today

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ASHRAE Society President, 2025-2026

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January 5, 2025

New York City Department of Buildings
Office of the General Counsel
280 Broadway
New York, NY 10007

Re: Comments Regarding New York City Department of Buildings Proposed Rule Relating to Safety Standards for Refrigeration

Sent via email to: dobrules@buildings.nyc.gov

To Whom It May Concern:

I am writing on behalf of ASHRAE, the American Society of Heating Refrigerating, and Air Conditioning Engineers. ASHRAE, founded in 1894, is a global professional society of more than 54,000 members, including more than 2,400 in New York, that focuses on building systems, refrigeration, energy efficiency, indoor air quality, resiliency, and sustainability. Through our research, standards writing, publishing, certification, and continuing education, ASHRAE shapes tomorrow's built environment today.

On behalf of our membership in New York, we wish to provide comments on the proposed rule change relating to safety standards for refrigeration in New York City that would add new sections 711-01, 7015-02, 7015-03 to Chapter 7000 of Title 1 of the Rules of the City of New York regarding refrigeration systems.

ASHRAE publishes several standards that are referenced in this proposed rule:

- ANSI/ASHRAE Standard 15-2022, *Safety Standard for Refrigeration Systems*, which specifies the safe design, construction, installation, and operation of refrigeration systems.
- ANSI/ASHRAE Standard 15.2-2022, *Safety Standard for Refrigeration Systems in Residential Applications*, which accommodates the use of A2L-classified refrigerants in low-rise residential applications and is intended for use by manufacturers, installers, contractors, service technicians, building code officials, and others.

- ANSI/ASHRAE Standard 34-2022, *Designation and Safety Classification of Refrigerants*, which specifies refrigerant properties and a refrigerant classification system. It assigns safety classifications, lower flammability limits, and refrigerant concentration limits based on toxicity and flammability data.

The background to the proposed rule explains that Local Law 77 of 2023 amended provisions of the New York City Mechanical Code relating to refrigeration, specifically regarding A2L refrigerants, and adopted ASHRAE Standard 15-2022 and ASHRAE Standard 34-2022. The proposal goes on to explain that the Department is proposing to add three new sections to reflect and operationalize these changes. While ASHRAE commends New York City for centering safety and sustainability in the built environment by adopting these standards, **we are concerned that the referenced standards are out of date. The most modern edition of these standards are the 2024 editions**, not the 2022 editions that the proposed rule references.

Essential updates have since been made to these standards since 2022 that are relevant to these rules and to New York City's stated goals. Standards 15 and 34 were revised and updated in 2024 to address a wider range of refrigerants, including those with lower global warming potential, such as A2L refrigerants, as well as to clarify safety mitigation requirements. The 2024 edition of Standard 34 adds safety designations for 28 new refrigerants and modernizes the application requirements for new refrigerants. The 2024 edition of Standard 15 was also revised to better align with the model codes; many of these changes have already been approved as part of the 2027 model code update cycle.

Because New York requires compliance with the 2022 edition of ASHRAE's refrigeration standards, rather than the current 2024 editions, it is out of sync with the latest industry best practices. The 2024 editions of ASHRAE Standards 15 and 34 provide essential guidance to manufacturers, design engineers, and operators who need to stay current with new air conditioning and refrigerating requirements, and **we urge New York City to adopt these modern standards**.

ASHRAE can offer member experts from our relevant technical committees to help address questions and issues related to refrigerant management and serve as a technical resource regarding the implementation of refrigerant requirements. If you need any additional information, please contact GovAffairs@ashrae.org.

Thank you for your consideration of ASHRAE's comments.

Sincerely,



Bill McQuade
ASHRAE Society President, 2025-2026