



Shaping Tomorrow's
Built Environment Today

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Ginger Scoggins
2023-2024 ASHRAE President

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April 25, 2024

The Honorable Angus McKelvey
The Honorable Linda Ichiyama
Chairs
Conference Committee
Hawaii State Legislature
415 South Beretania St.
Honolulu, HI 96813

Re: SB 2753 “Relating To Building Codes”

Dear Chairs McKelvey and Ichiyama:

I am writing on behalf of ASHRAE, the American Society of Heating Refrigerating, and Air Conditioning Engineers, to **support SB 2753**, titled “Relating to Building Codes” that sits before you in the House. ASHRAE, founded in 1894, is a global professional society of more than 53,000 members, including over 200 in Hawaii, that focuses on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability. Through our research, standards writing, publishing, certification, and continuing education, ASHRAE shapes tomorrow’s built environment today.

Current federal law provides that, to the extent practicable, certain ozone-depleting substances must be replaced by chemicals, product substitutes, or alternative manufacturing processes that reduce risks to human health and the environment. The U.S. Environmental Protection Agency is required to promulgate administrative rules identifying acceptable alternatives to these ozone-depleting substances. SB 2753 provides that no state agency and no local governmental unit may prohibit or limit the use of a refrigerant that the EPA has designated as acceptable for use. When the EPA accepts a substitute refrigerant, it is critical that state law also allows for its use; this legislation accomplishes that alignment.

EPA’s listing of acceptable substances for refrigeration and air conditioning under the Significant New Alternatives Policy (SNAP) program properly references ASHRAE standards concerning the classification and safe use of refrigerants in heating, air-conditioning, and refrigeration equipment. ASHRAE Standard 15-2022, *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 15-2022 is used in conjunction with ANSI/ASHRAE Standard 34-2022, *Designation and Safety Classification of Refrigerants*, which specifies refrigerant properties and a refrigerant classification system. It assigns safety classifications and refrigerant concentration limits based on toxicity and flammability data.

In short, this bill will provide for a smooth transition to alternate refrigerants and for alignment between state and federal laws. Building codes will also need to be updated to ensure that the transition to alternate refrigerants is safe and effective.

We urge swift passage of this bill by the full legislature. We believe that this legislation will enable a smooth transition to new refrigerants without conflict between state and federal laws, and in accordance with the appropriate safety standards. If you have any questions or need additional information, please feel free to contact GovAffairs@ashrae.org. Thank you for your work to improve the built environment and improve the lives of Hawaii residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ginger Scoggins', written in a cursive style.

Ginger Scoggins
ASHRAE President