

Request for Official Interpretation

Note: An “official” interpretation is defined as a written explanation of the meaning of a specific provision of a standard or guideline, as determined by an existing cognizant Project Committee or an Interpretation Committee (IC), in response to a written request. See StdC Reference Manual 10.2 for requests not covered. No provision is included for responding to requests for interpretation of superseded standards or guidelines. See StdC Reference Manual 10.3.2 for a request for “unofficial” interpretation.

Please tab through and provide the following information:

Request from: Name: Jason Eberstein

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Reference:	This request for interpretation refers to the requirements presented in:		
	ASHRAE	Number and Year:	15-2013
	Page Number(s):	7, 8, 9	
	Section(s):	7.5.1.2 & 7.5.3	
	Table(s):		
	Relating to:		

Background: We believe that the current version of ASHRAE 15, Section 7.5.1.2 has been mis-interpreted by some readers that portable, cord-connected, sealed-system, automatic vending machines that are Listed and installed in accordance with the manufacturer's instructions, with up to 150 grams of an A3 refrigerant may not be placed in lobbies or places of ingress or egress in commercial buildings. We believe this is incorrect.

First, in accordance with ASHRAE 7.2 and Exception 1, the automated and refrigerated vending machines in question are Listed equipment with OSHA NRTL testing laboratories in accordance with Section 13, are sealed system units, and contain not more than 150 grams of refrigerant.

Second, we do not believe Section 7.2.2 applies, as these vending machines are not used in industrial occupancies or refrigerated rooms.

Third, all amounts of refrigerants are significantly less than found in Table 7.4.

Fourth, the question we have applies to Section 7.5. As you know, refrigerated vending machines are often found in hallways, areas that might be used in ingress or egress and lobbies from buildings such as offices, motels, hotels, etc.

Our understanding of Paragraph 7.5.1.2 is that "Refrigerating systems installed in a public corridor or lobby shall be limited to either..." The statement appears to refer to the following items a. or b. The unit in question would either contain not more than the amount of refrigerant A1 or B1 according to Table 4-1 or 4-2 **OR** that the unit be a sealed type unit having quantities less than those in Table 7.4.

In this case, we believe refrigerated vending machines employing sealed systems using A2, A2L or A3 refrigerants, of less than or equal to 150 grams, comply with 7.5.1.2 Exception b. Thus, the restrictions on installation do not apply.

Fifth, in accordance with Paragraph 7.5.3, refrigerated vending machines with refrigerants Group A3 or B3 would comply with Exception 3, as such machines are portable (not fixed installation units or part of the building system) and contain not more than 150 grams of A3 refrigerant, and that the machines are installed in keeping with the manufacturer's instructions.

Note: Please provide background and supporting information here. State exactly what the requirements are and any conflicting information.

Interpretation: It is our understanding that portable, cord-connected, refrigerated vending machines, with sealed refrigerant systems, listed by an OSHA NRTL, installed in accordance with the manufacturer's instructions, containing not more than 150 grams of A3 refrigerant, may be installed in hallways, areas of ingress/egress, and lobbies of buildings.

We would like to have the ASHRAE Standard 15 committee's understanding of these paragraphs and whether the committee agrees with our reading of these sections. If this is the understanding of ASHRAE 15 committee, we intend to seek a change to UL Standard 541. It is also our understanding that to avoid a "chicken/egg" situation, we will start with the interpretation of the ASHRAE 15 committee first.

Note: Please provide your interpretation of the requirement(s). Present your interpretation in such a way as to allow for a yes or no answer by the applicable committee. The question below will be presented to the applicable committee for response.

Question: Is this Interpretation correct?

Note: This question will be presented to the applicable committee for response.

Answer: Note: The cognizant Project Committee or Interpretation Committee will provide a yes or no answer.

Comments: Note: The cognizant Project Committee or Interpretation Committee may provide additional comments.

Submit this form by e-mail, fax or mail to: Manager of Standards, ASHRAE, 1791 Tullie Circle, NE, Atlanta, GA 30329-2305, <mailto:standards.section@ashrae.org>, Fax: 404-321-5478.