



PROUDLY SERVING THE ENTIRE CALIFORNIA FIRE SERVICE SINCE 1922

December 3, 2020

CA Air Resources Board
PO Box 2815
Sacramento, CA 95812

Re: **Title 17, California Code of Regulations, section 95371 et seq. (CARB HFC Rule Comments)**

Dear Board Members:

The California State Firefighters' Association, representing 14,000 California firefighters, wholeheartedly supports protecting the environment and reducing global warming. However, we are concerned that steps to attain that goal with a 2023 transition date allowing dangerous replacement refrigerants may result in ignoring basic fire and life safety principles.

The January 2023 transition date, while seen as an admirable goal by some, does not allow the time necessary for testing and development of the needed safety measures for the equipment that will be installed in our homes.

The new replacement refrigerants are classified as flammable gases, and the equipment targeted for this transition includes stationary air conditioning units in residential and light commercial applications. These refrigerants are odorless and colorless. If there is a leak, the homeowner or occupants will be completely unaware of the leak until ignition occurs. Safety measures are not yet developed and must be in place before the transition date.

Underwriters Laboratories and the American Heating and Refrigeration Institute are currently conducting tests to evaluate the hazards presented by these flammable refrigerants. The testing will not be completed for several months. After completion of the testing, the data must be evaluated. After evaluation, safety protocols and safety features could be developed and tested. Once all this background work is completed, the manufacturers need to retool equipment to make this transition safely.

Training must be provided for the responding firefighters. Currently the use of flammable gases in homes is allowed; however, those gases (liquefied petroleum gas and compressed natural gas) have a safety component they are odorized. These new refrigerants are odorless and colorless. The odor is detectable far below the threshold where ignition can occur.

EPA is proposing a date of 2025 for the transition to the lower GWP refrigerants. The 2025 time frame allows time for testing, evaluation, development of safety features, training, retooling, etc. We strongly urge your Board to consider the January 2025 date. The 2025 date will also coincide with the next edition of construction codes for California. This includes the Building Code, Residential Code, Fire Code, Mechanical Code and the ASHRAE standards for design and installation of the equipment. The codes and standards currently do not allow flammable refrigerants in stationary residential units. The codes and standards will be revised and the 2024 edition of the codes will contain the appropriate safety requirements for design, installation, and maintenance of these units. Postponing until a January 2025 transition date allows the codes and standards to align the safety provisions with CARB's goal of

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environmental protection and safety.

The use of these new refrigerants can be accomplished safely, provided time is allotted for testing and development. We believe the proposed 2023 transition date will sacrifice life safety in the quest for environmental protection. I urge your Board to move the transition date to January 2025.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Shrout", written over a horizontal line.

Mike Shrout, CSFA President

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