



June 5, 2023

CA Building Standards Committee
Department of General Service
2525 Natomas Park Drive
Suite 130
Sacramento, CA 95833

Subject: PEME Code Advisory Committee Notice of Proposed Action Regarding 45-Day Public Comment period for the SFM 05/22 Proposed Amendments

Dear CA Building Standards Committee Members,

Daikin Comfort Technologies North America, Inc. ("Daikin") - (formerly Goodman Manufacturing Company, L.P.) submits the following public comments in response to the PEME Code Advisory Committee Notice of Proposed Action Regarding the 45-Day Public Comment Period ending June 5, 2023 for the SFM 05/22 proposed amendments.

Daikin is a member of Daikin Group, one of the largest heating, ventilation, and air conditioning ("HVAC") manufacturers in the world. DCT is headquartered in Waller, Texas, and employs thousands of workers across the United States. The company manufactures residential and light commercial heating and cooling equipment, and its products are sold and installed by contractors in every American state, as well as in Canada.

Daikin applauds the herculean efforts by Chief Anderson and Crystal Sujeski to draft the amendments as noted in SFM 05/22 regarding the 2024 CA Mechanical Code, Part 4, Title 24. These amendments are critically needed to meet the upcoming CARB regulations prohibiting the use of certain high Global Warming Potential (GWP) hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses. Chillers have to comply with these regulations effective 1/1/2024, other air conditioning equipment effective 1/1/2025 and Variable Refrigerant Flow (VRF) products effective 1/1/2026.

The HVAC&R industry has worked with IAPMO and the Mechanical Technical Committee to get these updates completed for the 2024 UMC so that they could be amended into the CA Mechanical Code ahead of these deadlines. Due to implementation of the AIM Act, EPA is working to complete regulations which would mirror the effective dates in this CARB regulation for a national regulation. Daikin appreciates the added amendments to update referenced standards to the latest editions as these represent the latest efforts of the entire industry to address the safe and reliable installation of products equipped with the new low GWP refrigerants.



Daikin fully supports these amendments and asks the CBSC to adopt these amendments as presented by SFM. However, there are a couple of minor editorial corrections that I would like to put forward at this time for committee consideration.

- In Item 5-12 Section 1104.6.2.4(2) - (page 11 of 32) it notes in the 2nd sentence “The supply air fan shall continue to operate for at least five minutes after the refrigerant detection system has sensed a drop in the refrigerant concentration below the value specified in Section 1104.6.6(b).” To align with the final changes to the 2024 UMC, this should state “The supply air fan shall continue to operate for at least five minutes after the refrigerant detection system has sensed a drop in the refrigerant concentration below the refrigerant detection system set point value specified in Section 1104.6.6(b).”
- In Item 5-31 Section 1106.11.1 - (page 19 of 32) it notes a temperature of 1290°F (70°C). This metric conversion is incorrect. This should read 1290°F (700°C).
- In Item 5-48 Section 1106.11.10.4 - (page 23 of 32) the title and the Section number are incorrect. Section 1106.11.10.4 Emergency is addressed in Item 5-47 on page 22 of 32. This Item 5-48 should note Section 1106.11.11 Mechanical Ventilation.

Thank you for the opportunity to comment on these critically important amendments.

Regards,

Robert S. Glass

Manager, State Regulatory Affairs

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