



03 June 2023

Kevin Day, Interim Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, Ca 95833

Re: Public Comment on SFM 05/22

Dear Mr. Day and Commission Members:

These comments are submitted by Heat Transfer Products Group (HTPG) Division of Rheem Manufacturing regarding the proposed building standards of the Office of the State Fire Marshal regarding the 2022 California Mechanical Code, California Code of Regulations, Title 25, Part 4 (SFM 05/22).

Heat Transfer Products Group (HTPG), headquartered in Duluth, Georgia, designs, manufactures, and markets energy-efficient commercial and industrial refrigeration equipment and system solutions sold under the trusted premium brands: Russell, Witt, Kramer, and ColdZone. The manufacturing plant is located in Scottsboro, Alabama and warehouses are located in California, Texas, and Alabama. HTPG is a member of the Rheem Family of brands

Heat Transfer Products Group (HTPG) supports the reduction of greenhouse gas emissions and welcomes new lower global warming potential (GWP) refrigerants to the market. Accordingly, Heat Transfer Products Group (HTPG) and the heating, ventilation, air conditioning and refrigeration (HVACR) industry have played a leading role in ensuring that national model codes, as well as locally adopted codes, are ready for the transition to lower GWP refrigerants. Going forward, the most technologically advanced and efficient HVACR equipment produced will be using these more environmentally friendly refrigerants.

Heat Transfer Products Group (HTPG) supports the proposals in SFM 05/22 because they help align the California Mechanical Code with 2024 national model codes, including the 2024 UMC, with respect to equipment using lower GWP refrigerants, many of which are Safety Class A2L. As proposed, the mechanical code is silent on commercial refrigeration using A2L refrigerants. Adding a new Section 1104.10, as proposed below, provides additional clarity regarding situations where A2L refrigerants can be employed for high probability, direct refrigeration systems.

1104.10 Applications for Commercial Refrigeration. High-probability commercial refrigeration systems using Group A2L refrigerants shall comply with the equipment listing and ASHRAE 15.

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Heat Transfer Products Group (HTPG) respectfully asks for the Commission's support of SFM 05/22 with the addition of Section 1104.10, as proposed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Shughart", with a horizontal line underneath.

Sincerely,

Ronald L. Shughart
Compliance Engineer Project Manager
HTPG Heat Transfer Products Group
Rheem Manufacturing Company

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