



NY - GEO 2025
APRIL 23-24, 2025 | SARATOGA SPRINGS, NY



Refrigerant Regulations

Design Implications

Speaker:

Jason Filler / *FW Webb*



F.W. WEBB COMPANY

A Wholesale Distributor and More

Agenda



- Refrigerant Updates
- A2L Refrigerants
- ASHRAE 34/15
- A2L Equipment
- Applying ASHRAE 15
- VRF Designs
- Design Examples



Regulations Update



They're moving the goal posts!



Make Refrigerant Great Again!



BREAKING NEWS

Updated: EPA Reconsiders Refrigerant Rule

The Agency is Reevaluating the AIM Act's Technology Transition Rule

By Joanna R. Turpin



Bottom Line



Changes to Technology Transition Rule Take Time



Current Timeline



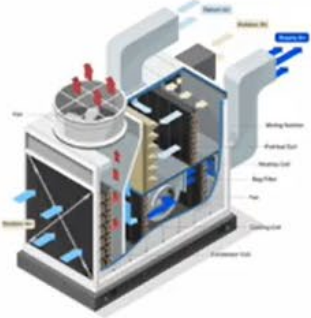
Refrigeration Transition

Self-contained retail food refrigeration	Supermarket Refrigeration (remote condensing units)	Retail Food (remote condensing unit)	Industrial Process Refrigeration
			
Product	System	System	System or Product
Manufacture prohibition after January 1, 2025 Sell-through for three years until January 1, 2028	Full system install prohibition after January 1, 2027	Full system install prohibition after January 1, 2026	Systems: Install prohibition after 1/1/26 (except -30°C to -50°C, 1/1/28) Products: Manufacture prohibition after 1/1/26 (except -30°C to -50°C, 1/1/28)

Current Timeline



AC/HP Transition

Commercial & Residential Package AC/HP	Chillers used for comfort cooling	Residential and Light Commercial AC/HP	VRF/VRV AC/HP
			
Product	System/Product	System	System
Manufacture prohibition after January 1, 2025 Sell-through for three years until January 1, 2028	Full system install prohibition after January 1, 2025 *Chillers with no refrigerant leaving the unit are treated as a product and have a compliance deadline of January 1, 2025	Full system install prohibition after January 1, 2026 using components manufactured before January 1, 2025	Full system install prohibition after January 1, 2027 using components manufactured before January 1, 2026

NYS DEC Part 494



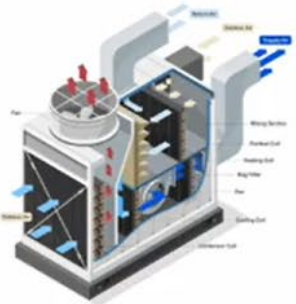
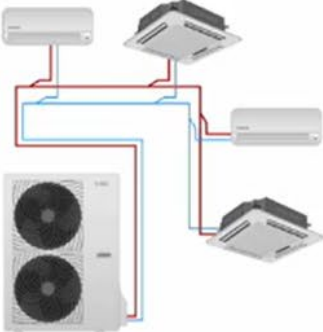
New York Refrigeration Transition

Stand-alone units medium/low temperature	Supermarket Refrigeration	Remote Condensing Unit	Refrigerated food processing and dispensing equipment
			
Product	System	System	System or Product
Manufacture prohibition after January 1, 2025 Sell-through for one year until January 1, 2026	Full system install prohibition after January 1, 2026	Full system install prohibition after January 1, 2026	Systems: Install prohibition after 1/1/26 Products: Manufacture prohibition after 1/1/26
GWP20 <10: January 1, 2034	GWP20 <10: January 1, 2034	GWP20 <10: January 1, 2034	GWP20 <10: January 1, 2034

NYS DEC Part 494



New York AC/HP Transition

Commercial & Residential Package AC/HP	Chillers used for comfort cooling	Residential and Light Commercial AC/HP	VRF/VRV AC/HP
			
Product	System/Product	System	System
Manufacture prohibition after January 1, 2026 Sell-through for one year until January 1, 2027	Full system install prohibition after January 1, 2025 *Chillers with no refrigerant leaving the unit are treated as a product and have a compliance deadline of January 1, 2025	Full system install prohibition after January 1, 2026	Full system install prohibition after January 1, 2026
GWP20 <10: January 1, 2034	GWP20 <10: January 1, 2030	GWP20 <10: January 1, 2034	GWP20 <10: January 1, 2030

Refrigerant Market



		R-410 A	R-466 A	R-452 B	R-454 B	R-32
GWP	AR4	2088	734	698	466	675
Safety	ASHRAE Class	A1	A1*	A2L	A2L	A2L
Composition	Refrigerants (% by weight)	R-32 / R-125 (50 / 50)	R-32 / R-125 / R-131i (49 / 11.5 / 39.5)	R-32 / R-125 / R-1234yf (67 / 7 / 26)	R-32 / R-1234yf (68.9 / 31.1)	R-32 (100)
Efficiency (COP)	R-410A = 1.0	1	↑ 1%	↑ 1%	↑ 1%	↑ 1%
Capacity Change	R-410A = 1.0	1	↓ 3%	↓ 3%	↓ 4%	↑ 7%
Glide Condenser	(Δ F / Δ K)	0.2 / 0.1	2.7 / 1.5	2.2 / 1.2	2.6 / 1.4	0 / 0

	R-22	R-454 A	R-444 B	ARM-20b	R-290
GWP(AR4)	1810	239	295	251	3
ASHRAE 34 Classification	A1	A2L	A2L	A2L [†]	A3
Composition	Chlorodifluoro methane	R-32 / R-1234yf (35 / 65)	R-32/ R-1234ze(E)/ R-152a (41.5 / 48.5 / 10)	R-32 / R-1234yf / R-152a (35 / 55 / 10)	propane
Efficiency* (COP)	1	↑ 4%	↑ 1%	↑ 2%	=
Capacity*	1	↑ 2%	↑ 2%	↑ 5%	↑ 10%
Condenser Glide* (R/K)	0	9.4 / 5.2	13.3 / 7.4	8.7 / 4.8	0

Hank Hill



SB-25 & AB-361



- Would Require NYS to Comply/Mirror EPA Phase Out Dates
- This is making its way through committees and hopefully will go to votes.
- Bipartisan Bill Package
- Sponsored by:
 - Sen. Patrick Gallivan, Sen. George Borrello, Gen. Pamela Helming, Sen. Peter Oberacker, Asmb. William Conrad, Asmb. Pamela Hunter.

NEW A2L REFRIGERANT CHANGES IN NEW YORK STATE **NY SB-235 AND AB-361 BILL PACKAGE**



- Requires NYS to align with EPA regulations and phase out dates.
- AHRI is supporting this bill package

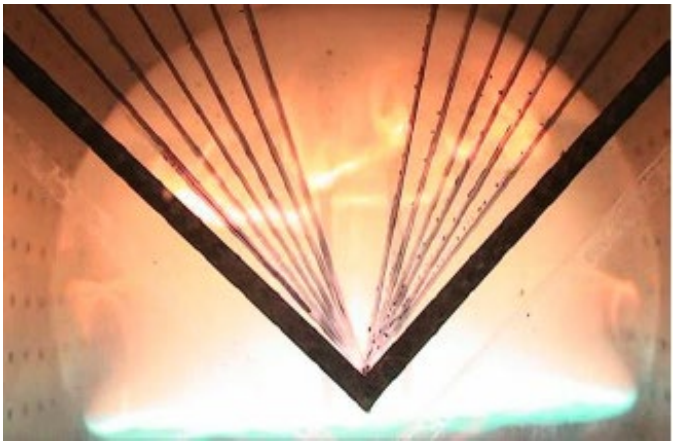
The Difference Between ASHRAE Refrigerant Flammability

There are “no” Hydrocarbons in A2L’s...

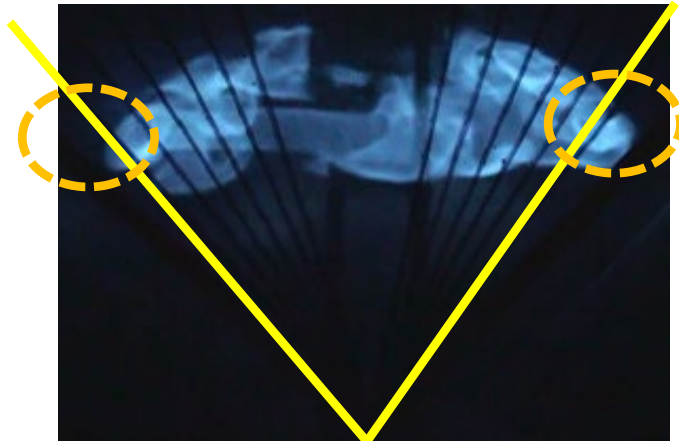


Rampant rumors of A2L’s containing Propane

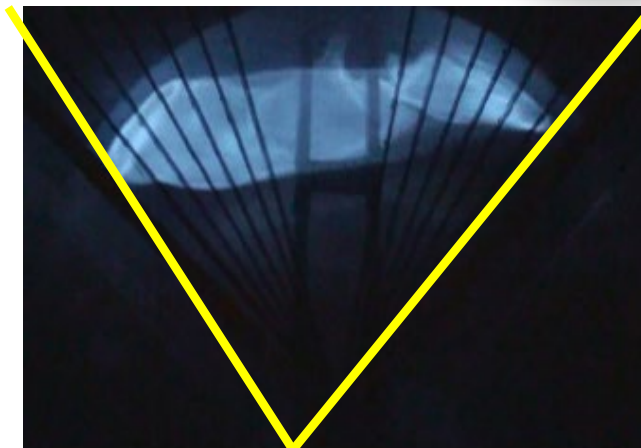
ASTM E681



Class 3 (Propane)



Class 2L (R454B / R32)



Class 1 (R410A)

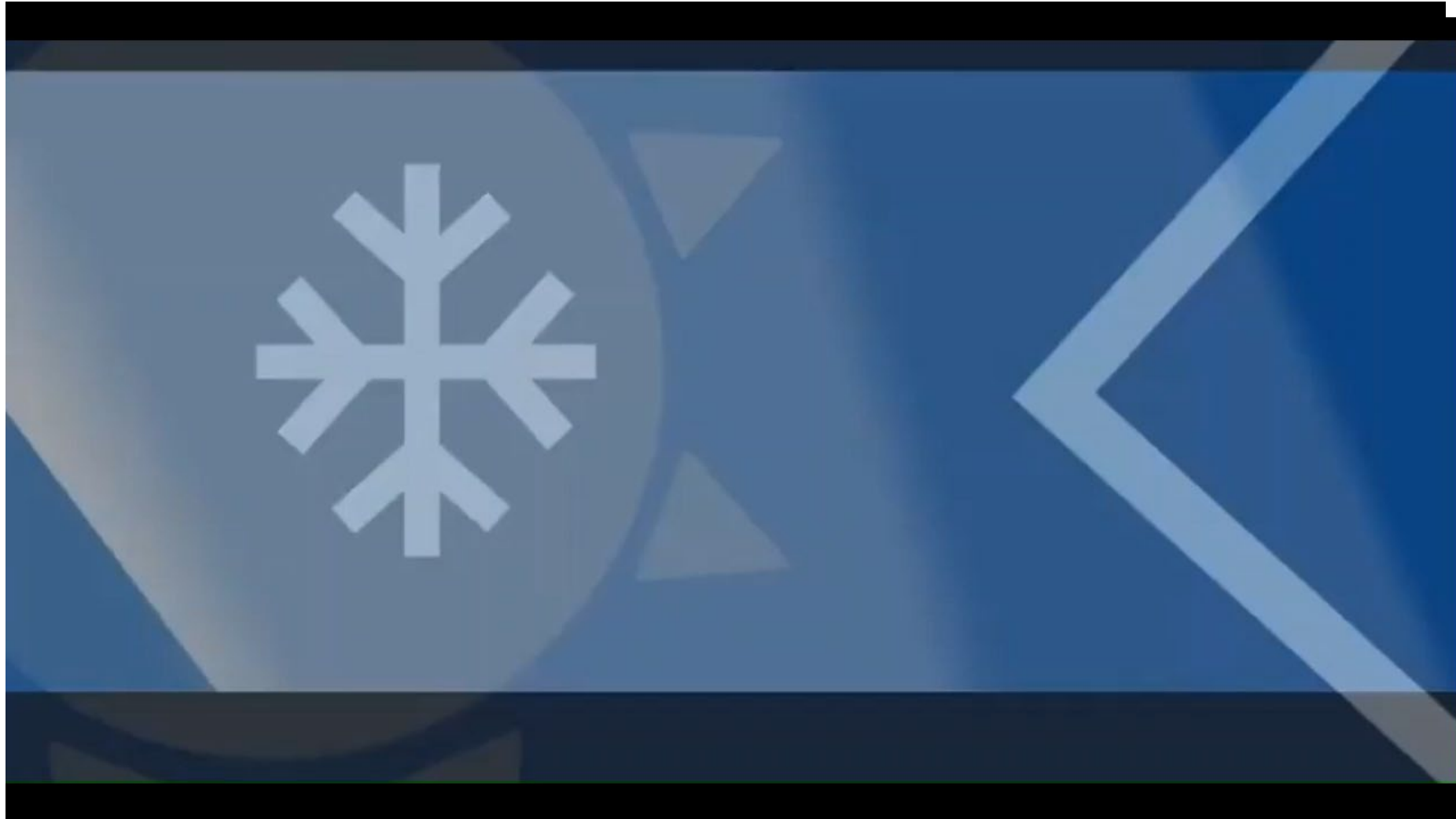
ASHRAE 34

Refrigerant	GWP	Toxicity	Flammability
R-410A	2,088	A	1
R-134A	1,430	A	1
A2L (R-32)	675	A	2L
A2L (R-454B)	466	A	2L
R-290	N/A (< 5)	A	3

- The difference between Class 1 & Class 2L is a few degrees
- A2L’s like R454B / R32 have far less ignition energy than A3’s
- Toasters, electric heaters, cigarettes and other common household products will not ignite an A2L.



Refrigerant Video



Key Takeaways



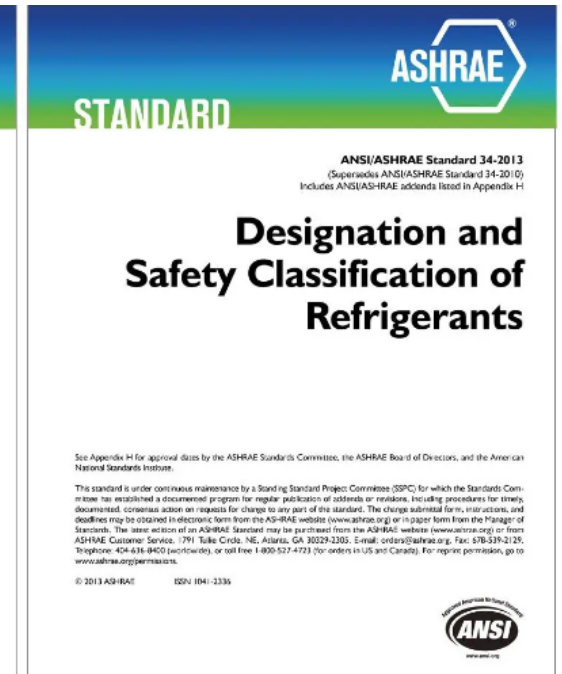
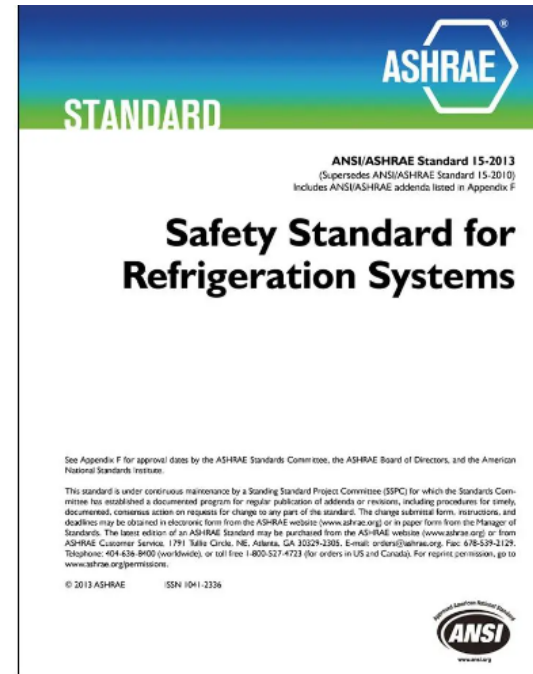
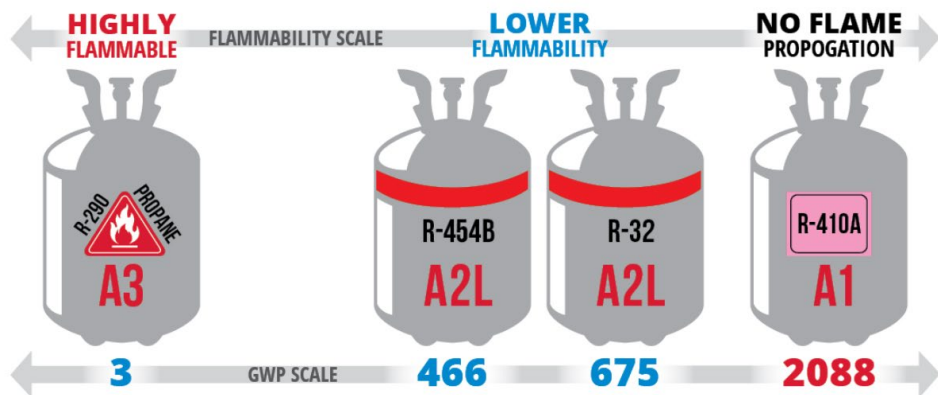
- **LFL (Lower Flammability Limit)** The concentration of the refrigerant required in air to ignite. A3 is 2% of Air. A2L is 4x propane
- **MIE (Minimum Ignition Energy)** A2L is 2000x higher than propane. 300mJ vs mJ.
- **Reactivity, Burning Velocity, Flame Spread:** A2 is 5x slower than A3.

ASHRAE 15 and 34



- ASHRAE 15 relies on ASHRAE 34:
 - Refrigerant safety classifications
 - Toxicity
 - Flammability
 - Oxygen Deprivation
 - Key refrigerant property information that must be submitted with an application for designation

FLAMMABILITY & GWP COMPARISON



ASHRAE 34 RCL



Limits are established to ensure that a potential leak remains safe for the occupants.

26 Lbs of R410A
per 1,000 Ft³

13 Lbs of R410A
per 1,000 Ft³
(institutional)



A2L Limits



Limits for A2L will be a $\frac{1}{5}$ of current limits.

19Lbs of R32 per
1,000 Ft3

5Lbs of R32 per
1,000 Ft3
(institutional)



Applying ASHRAE 15



- Identify Safety Group Classification of the Refrigerant
- Determine Occupancy Classification
 - Institutional
 - Industrial
 - Public Assembly
 - Commercial
- Determine System Probability Classification
 - High probability-RTU, Split, HP, VRF, Ptac
 - Low Probability-Chiller

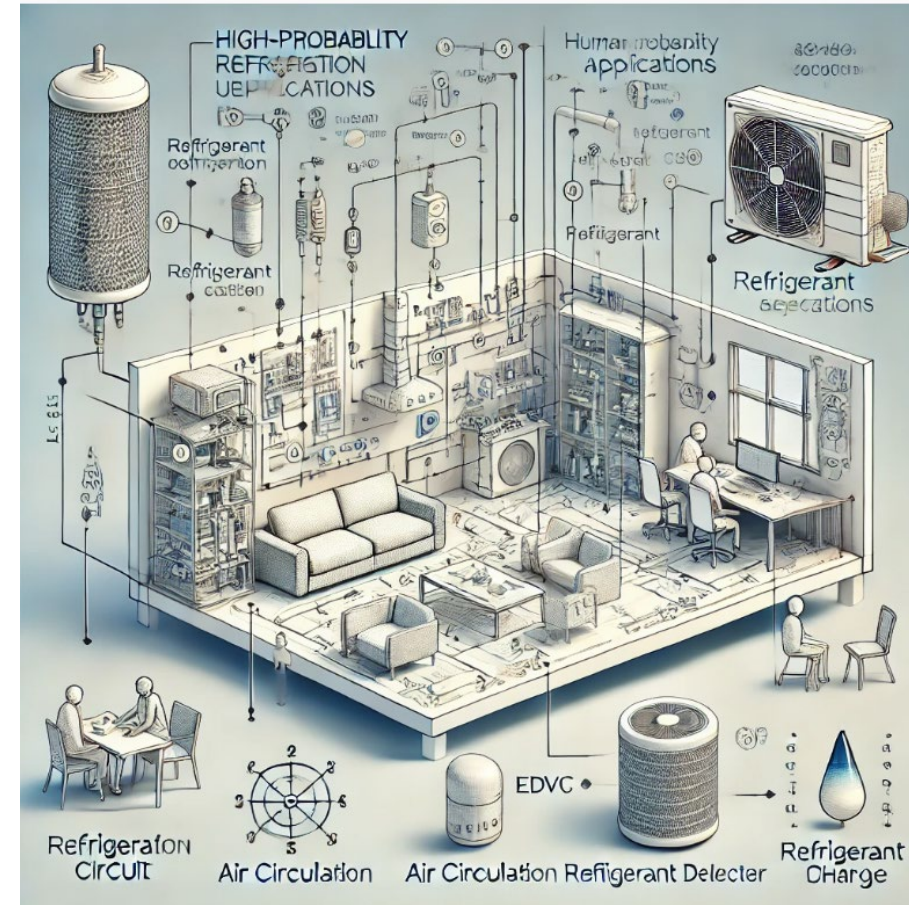
ANSI/ASHRAE Standard 15-2013 Refrigerating System

SYSTEM TYPE	cooling or heating source	material to be cooled/heated	SYSTEM CLASSIFICATION
direct			high probability
indirect open spray			high probability (conditional)
double indirect open spray			low probability
indirect closed			low probability
indirect vented closed			low probability

A2L Requirements



- **LISTED EQUIPMENT MUST BE USED**
- UL 60335-2-40/CSA C22.2 No. 60335-2-40, *Standard for Household and Similar Electrical Appliances—Safety—Part 2-40: Particular Requirements for Electrical Heat Pumps, Air-Conditioners and Dehumidifiers*
- UL 484, *Standard for Room Air Conditioners*



Standard 15 VS UL Listing



- Both standards set a maximum refrigerant charge limit. UL 60335-2-40/CSA C22.2 No. 60335-2-40 requires manufacturers to calculate the minimum floor area for the room served by the equipment, based on a specified minimum installation height, and display these values on the product nameplate. Standard 15 calculates refrigerant limits using an effective dispersal volume (V_{eff})
- Does not include an occupant adjustment factor (F_{occ}) when determining the maximum refrigerant charge. Therefore, for an occupancy classified as "institutional," the Standard 15 calculation of EDVC will likely be more stringent
- There are some applications where Standard 15 might require a refrigerant detection system.

RDS system required



□ Manufacturer's RDS is mandatory for certain systems (7.6.2.3)



Ducted systems with $m_{rel} > 4.0lb$ and low openings*



Ducted systems considering connected spaces



Institutional occupancies

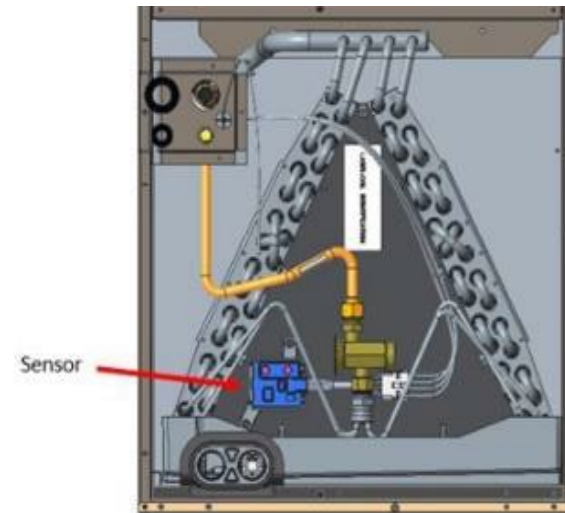
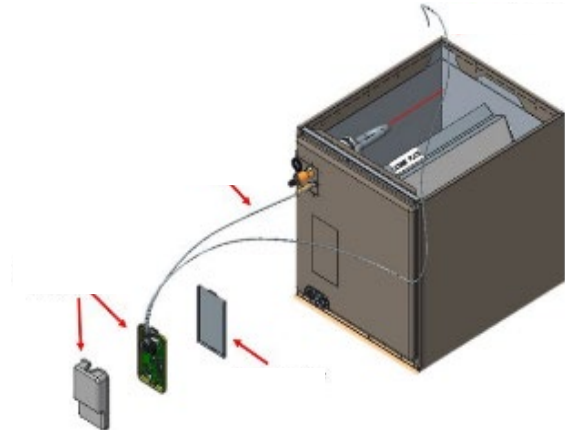
- Ducted system that has releasable charge Greater than 4lbs or has any duct opening lower than 5.9 ft above the finished floor
- Ducted systems in which connected spaces served by the same supply air duct are used to calculate the EVDC
- Refrigeration system installed in institutional occupancy
- Must be integral and listed with the equipment

A2L Equipment



- A2L Products will begin entering the market “in mass” this year
- RDS MUST be factory mounted “Generic” RDS “kits” not allowed. MUST BE INTEGRAL AND LISTED
- Multiple sensors for larger units...
- All RDS will be listed by a safety agency for the specific units to which they are applied
 - Per UL 60335-2-40, ASHRAE 15 & 15.2
- RDS not required in all applications
 - Below minimum’s charge size (< 4 lbs)

Split System Product



RDS Requirements



Shall alarm within **30 seconds** of exposure to 25% LFL



Pre-calibrated, nonadjustable set point



Shall resist poisoning over time



Shall not be damaged by release of refrigerant or oil



Long term stability
temp | RH% | pressure
vibration | electrical



Hourly self-test with alarm on failure**, close on power failure



Self-determination and alarm on EOL*



Accessible and serviceable for replacement

RDS



Control Requirements



Part of a UL-60335-2-40
listed system



Indoor units shall be
5-tons or less



Refrigerant
detection in all units
or all spaces



Isolate all possible paths in the event of system failure

Mitigation Actions



Energize
equipment's *air*
circulation fans



Open all (any) zone dampers to full airflow & activate ventilation*



De-energize any electric heat and ignition sources



Activate safety
shutoff valves



Room Volume Calculations



SYSTEMS WITH AIR CIRCULATIONS

Effective dispersal volume charge (EDVC)=

is the **maximum refrigerant charge** permitted for an effective dispersal volume

The refrigerant charge of a direct system (or releasable charge) cannot exceed the EDVC

- A2L INCLUDE OCCUPIED AND NON OCCUPIED.

EFFECTIVE DISPERSAL VOLUME CHARGE

$$EDVC = V_{eff} \times LFL \times CF \times F_{occ}$$

EDVC = effective dispersal volume charge, lb (kg)

V_{eff} = effective dispersal volume, ft³ (m³)

LFL = lower flammability limit, lb/ft³ (kg/m³)

CF = concentration factor, value of 0.5

F_{occ} = occupancy adjustment factor; (For all occupancies other than institutional occupancies,

F_{occ} has a value of 1. For institutional occupancies, F_{occ} has a value of 0.5.)

Exempt Spaces



Determining V_{eff} – Exempted Spaces

Spaces containing only **continuous refrigerant piping**, or **joints & connections** that have **been tested** in accordance with 9.13 are exempt from the effective dispersal calc.



Connected Space



Option 1

**Permanent Natural
Ventilation
Openings**

Option 2

**Spaces Connected
via Ductwork***

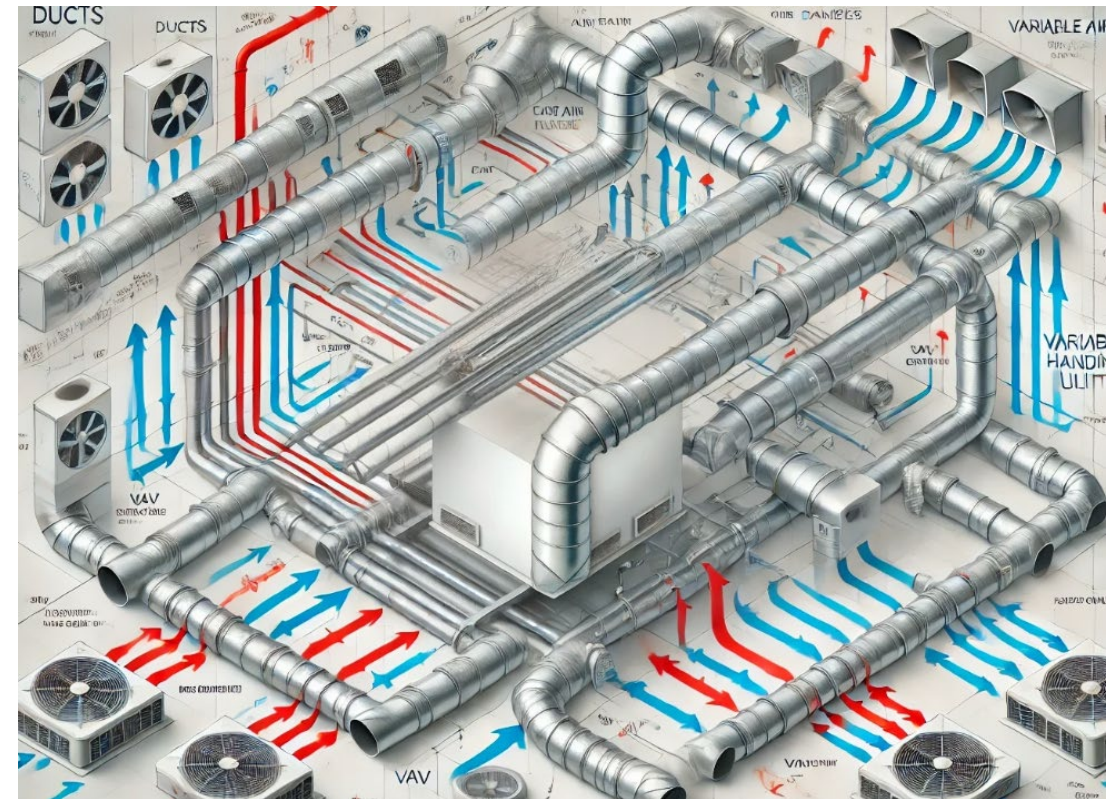
Option 3

**via Mechanical
Ventilation**

Permanent Natural Ventilation Openings



- Spaces connected by natural ventilation openings must be on the same floor of a building
- Equations are provided to determine the required minimum size of the opening
- Bottom of the opening of the connected spaces must be no higher than 12" above the finished floor.
- **Any Area of the opening above 12" cannot be considered for meeting the minimum size requirement.**
- Ductwork
 - Include volume of all spaces served by common supply and return ductwork unless the space can be total close off other than by a smoke or fire damper.
 - You can include the space it serves Unless a vav box reduces the airflow to below 10% of its design air flow
 - Include volume of supply and return ductwork
 - Include volume of ceiling or floor plenum, if its part of the supply or return air system
 - VRF system tied to 3rd party AHU



MECHANICAL VENTILATION



- Different 62.1
- Removal of air and leaked refrigerant from a space, in the event of a refrigerant leak. Not intended to control indoor air quality. Rather, ventilation in Standard 15 serves as a safety mitigation method for reducing the refrigerant concentration within a space.
- Required use of separate exhaust fans.
- Most likely use when equipment does not have circulation fan.
- Can either operate continuously or be activated by refrigerant detector.
- Makeup air must be provided, with opening positioned to allow makeup air to mix with leaked refrigerant
- Intakes for exhaust air located with bottom edge of intake less than 12" above where leaked refrigerant accumulates.
- Discharge to prevent recirculation of exhaust air.
- No ignition sources in space where equipment is located.
- No open flame devices
- Monthly testing
- New for 2024 Where two or more spaces are connected by a mechanical ventilation system complying with the requirements of Section 7.6.4, the volume of all such *connected spaces shall* be included in the *effective dispersal volume* used to calculate the EDVC



Refrigerant Change Over Box



- When a *ventilated enclosure* is applied, compliance with the other requirements for Mechanical Ventilation are not required



Ventilated MCU Concept

Ventilated Enclosure

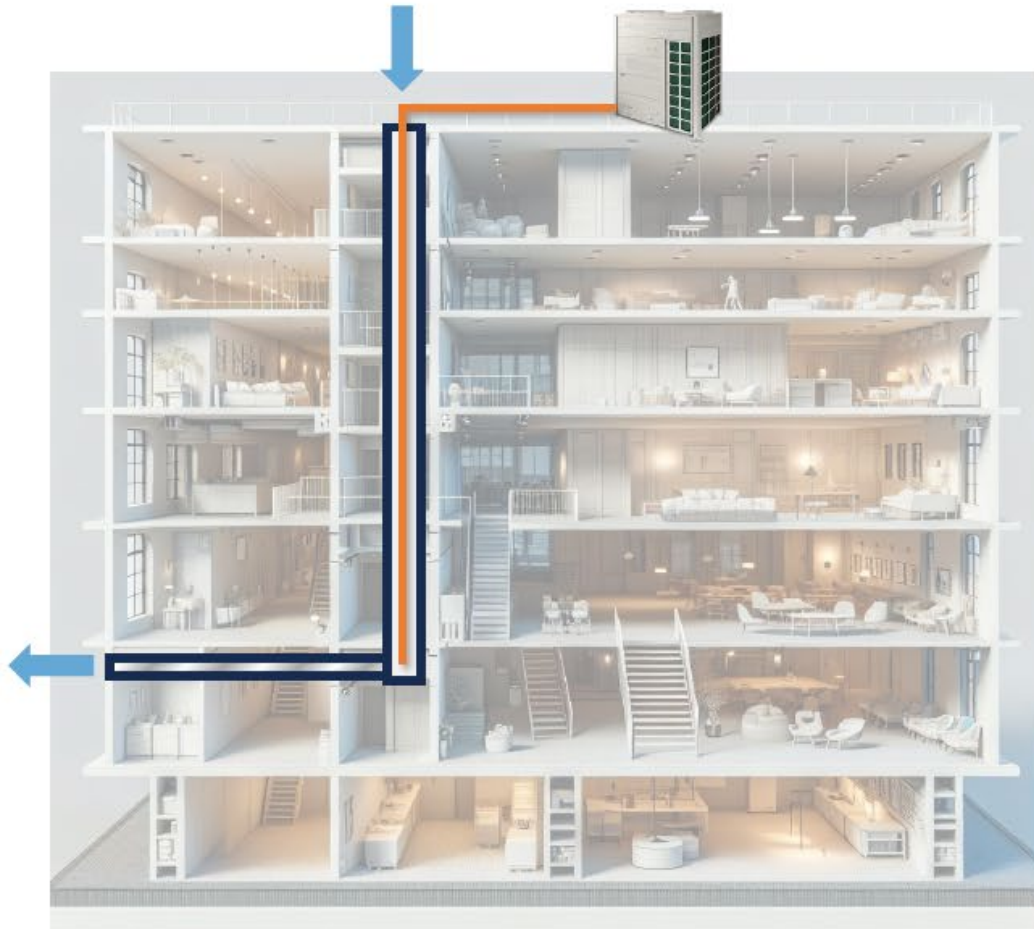
- Exhaust system prevents leak of refrigerant to surrounding space
- Exhaust to outdoors or sufficiently large space volume
- Keeps appliance under negative pressure (20 Pa)
- Minimum exhaust airflow
 - Min 11 CFM for ETRS systems

Shaft Ventilation

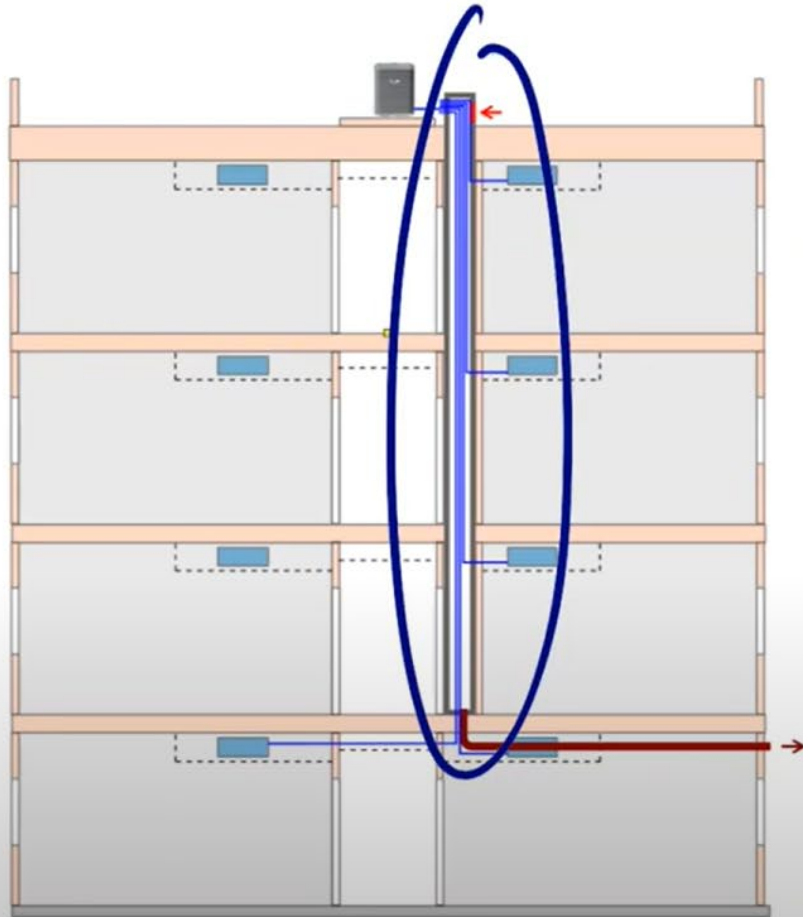


Option 1: Natural Ventilation

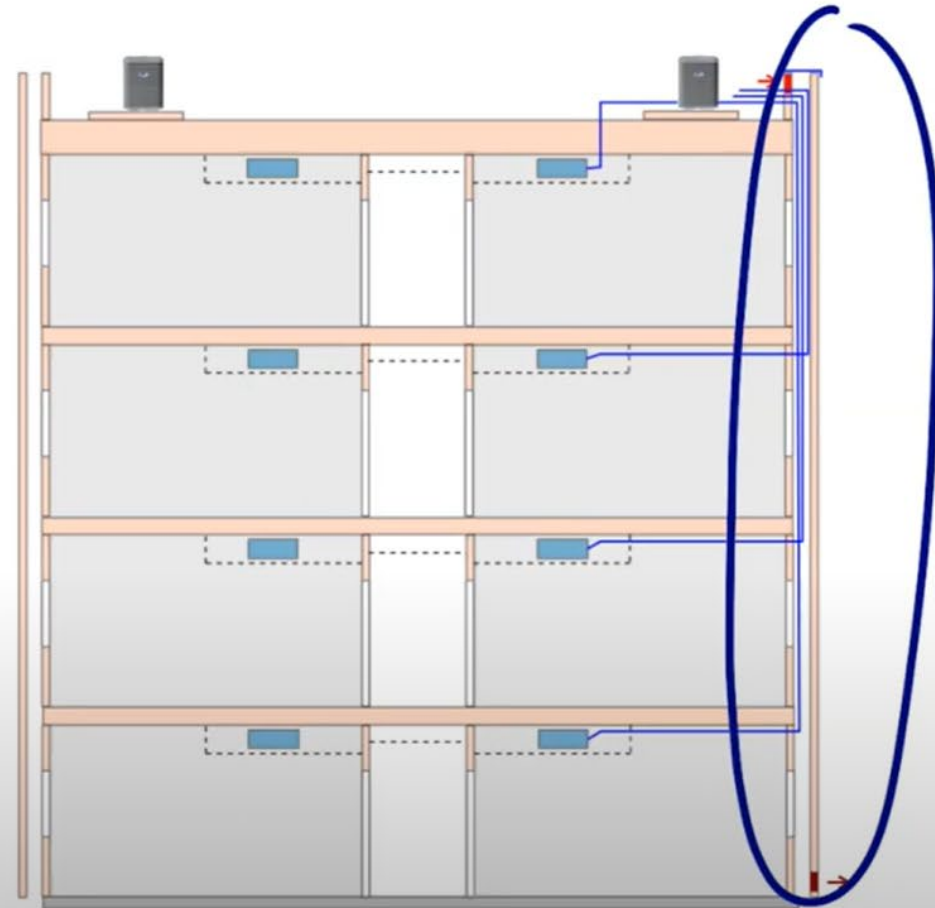
- Shall have a pipe, duct, or conduit:
 - Min. 4" Ø
 - Connects to the lowest point of the shaft
 - Level or pitched downwards to outdoors
 - Extends to the outdoors
- Makeup air opening should be provided at the top of the shaft (when designing in accordance with ASHRAE 15)



Shaft Ventilation



RS/RL PIPES PENETRATE 2 OR MORE FLOOR ASSEMBLIES



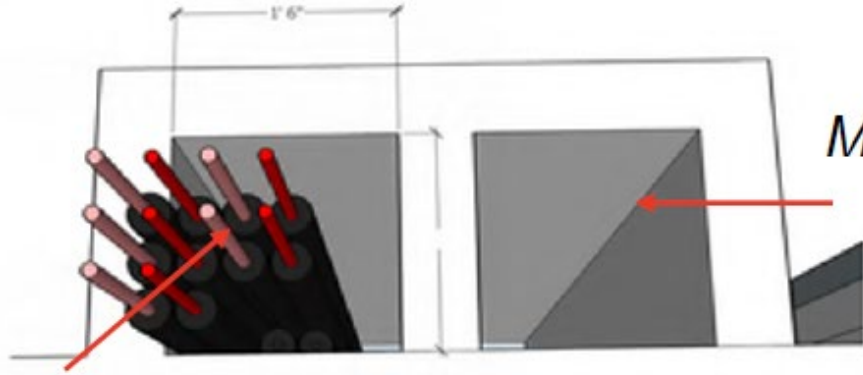
RS/RL PIPES OUTSIDE OF THE BUILDING ENVELOPE

Mechanical Shaft Ventilation



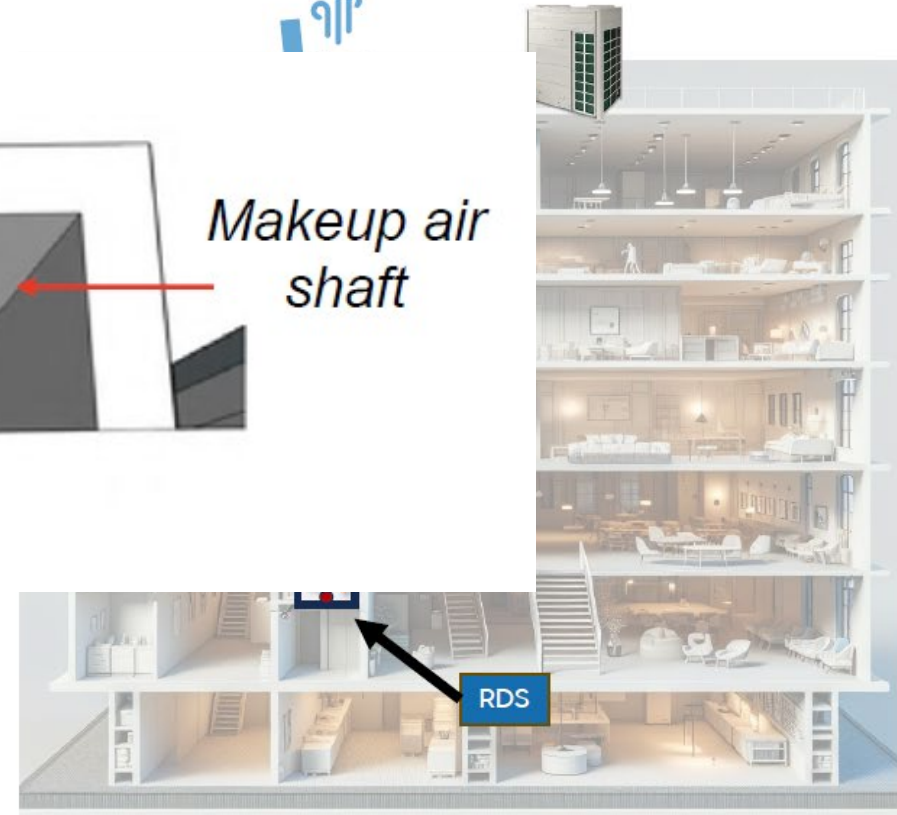
Option 2: Mechanical Ventilation

- Must meet minimum air velocity



Piping shaft exhaust

- Must operate
- ...Include activate
 - Note! This is not an SHA-supplied RD.
 - located in an area will a leak will concentrate
 - Activate ventilation at 25% LFL



Exceptions



• 9.12.1.5.1 Shaft Alternative (b)

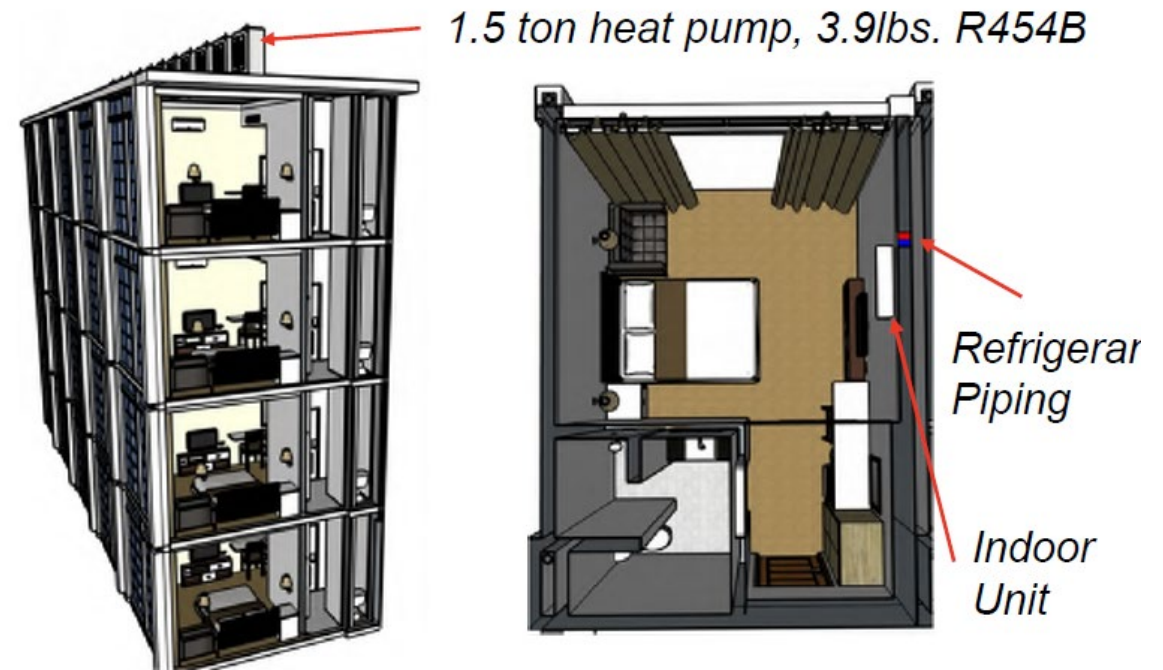
Key Requirement:

- Refrigerant piping penetrating 2 or more floor/ceiling assemblies must be enclosed in a fire-resistance-rated shaft.
- Shaft construction must comply with applicable building codes for life safety and containment.

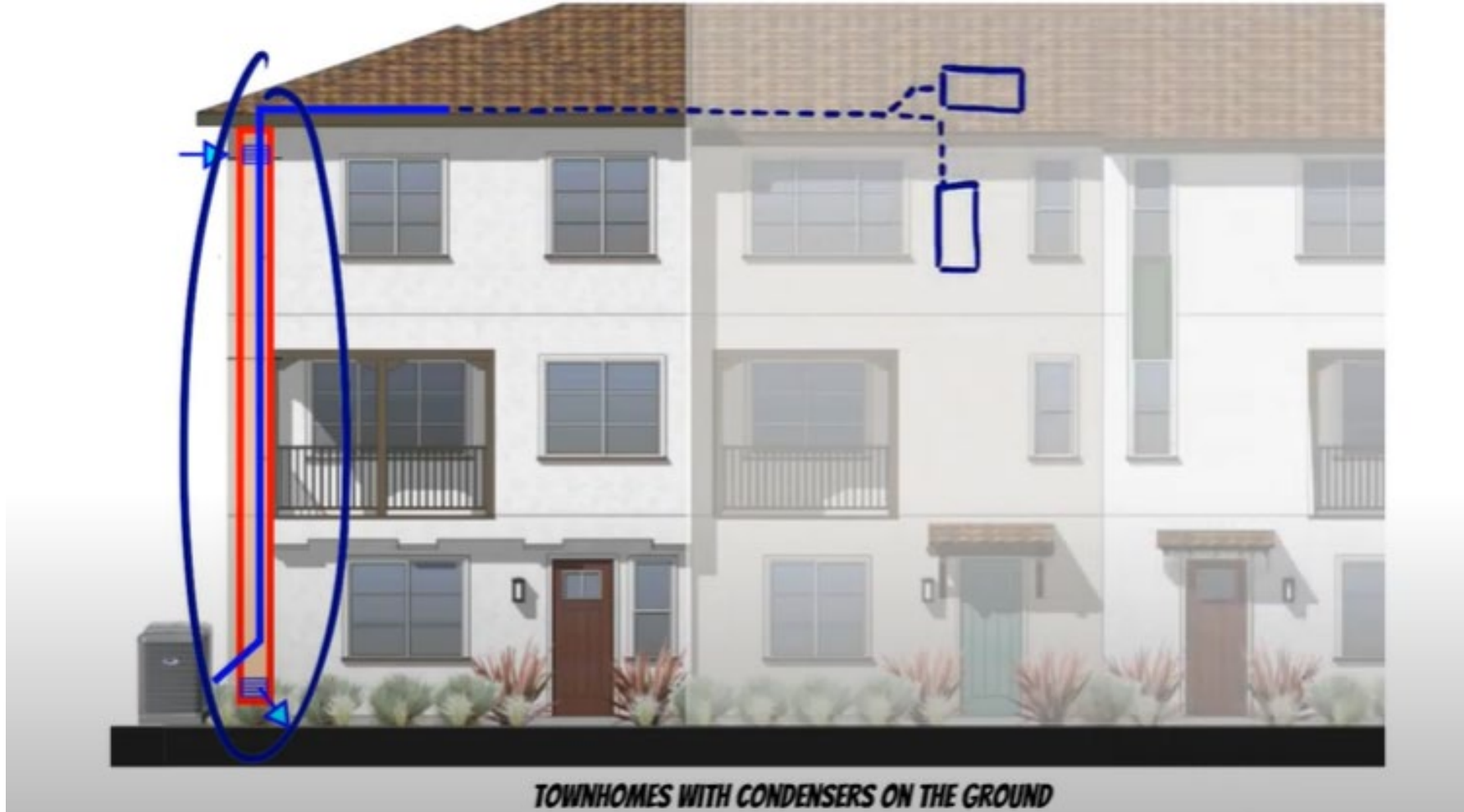
What Else Can Be Routed in the Shaft:

- Domestic water piping
- Electrical conduits
- Communication wiring
- Sprinkler lines

(As long as shaft meets code and refrigerant piping is properly enclosed)



Townhomes



Prohibited Locations



Prohibited Locations for Refrigerant Piping (Section 9.12.1.3)

- Refrigerant piping shall not be installed in any of the following locations if exposed:
 - Within a fire-resistance-rated exit access corridor.
 - Within an interior exit stairway
 - Interior exit ramp
 - Exit passageway
 - Elevator, dumbwaiter, or any other shaft containing a moving object.

Exit Passageway Definition: An exit component separated from other interior spaces of a building or structure by fire-resistant-rated construction. Provides a protected egress path in a horizontal direction to an exit or outside exit door.

Machinery Room–Detection & Ventilation



Ventilation Requirements (8.11.6.1)

- Continuous OR Activated (by RDS)
 - If continuous, failure of system activates an alarm
- Vented to outdoors
- Via one or more powered fans
 - Single or multi speed
 - Electric motors NOT in ductwork
 - Fan rotating elements shall be nonferrous or nonsparking OR...
 - ...Casing shall consist of or be lined with such material
- Makeup air shall serve no other areas*
- Inlet location specifics*
- Level I Ventilation rate at minimum
- Level II Ventilation rate

Detection Requirements (8.11.6.2)

- Detection of concentration > 25% LFL** shall:
 - De-energize compressors
 - De-energize pumps
 - De-energize normally closed automatic refrigerant valves
 - De-energize other unclassified electrical sources with apparent power > 1 kVA

Machinery Room-Refrigerant Detectors



Detect each
refrigerant designation



Setpoint not greater
than lowest OEL



Setpoint not greater
than lowest RCL



Means for automatic
self-testing w/
trouble alarm



Tested during install



Tested annually or per
mfg.'s instructions*

Machinery Room-Alarm Requirement



Visual and audible
inside



Visual and audible
outside each door



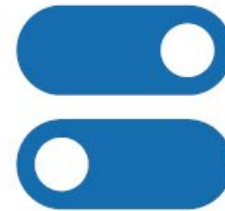
Manual reset located
inside*



Alarm on self-test
failure



Dedicated, remote control
shutdown outside door(s)
for equipment



Ventilation control switch
outside door(s)

Machine Room Example



8.11.11 Ventilation-Exhaust Calculations

- Ventilation Calculation Example (I-P):
 - Water Source HP system greater than 27.5 lbs, use equation 8-4
 - Machinery Room 6' x 10'
 - Refrigerant Pressure: 425psig

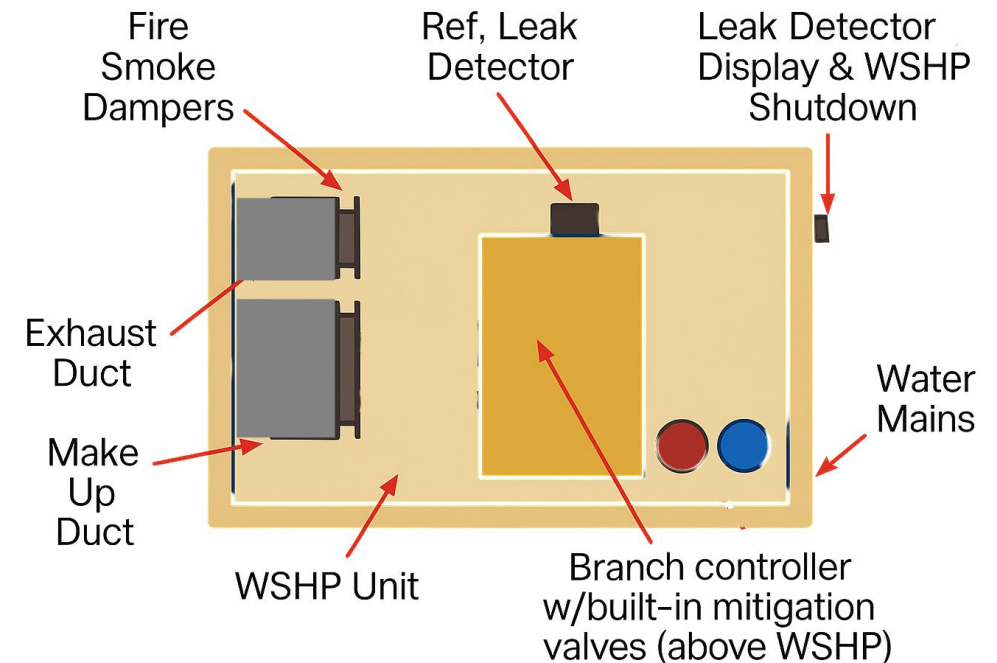
Table 8-3

G =	30
P =	425
G' =	271.5788
Q' =	27531.74
Q1 =	40
Airflow Q (cfm) =	3876.706

Table 8-2

Machinery Room	
Area [sf] =	80
Min Airflow [cfm]	40

Exhaust Fan Requirement: 3876 CFM

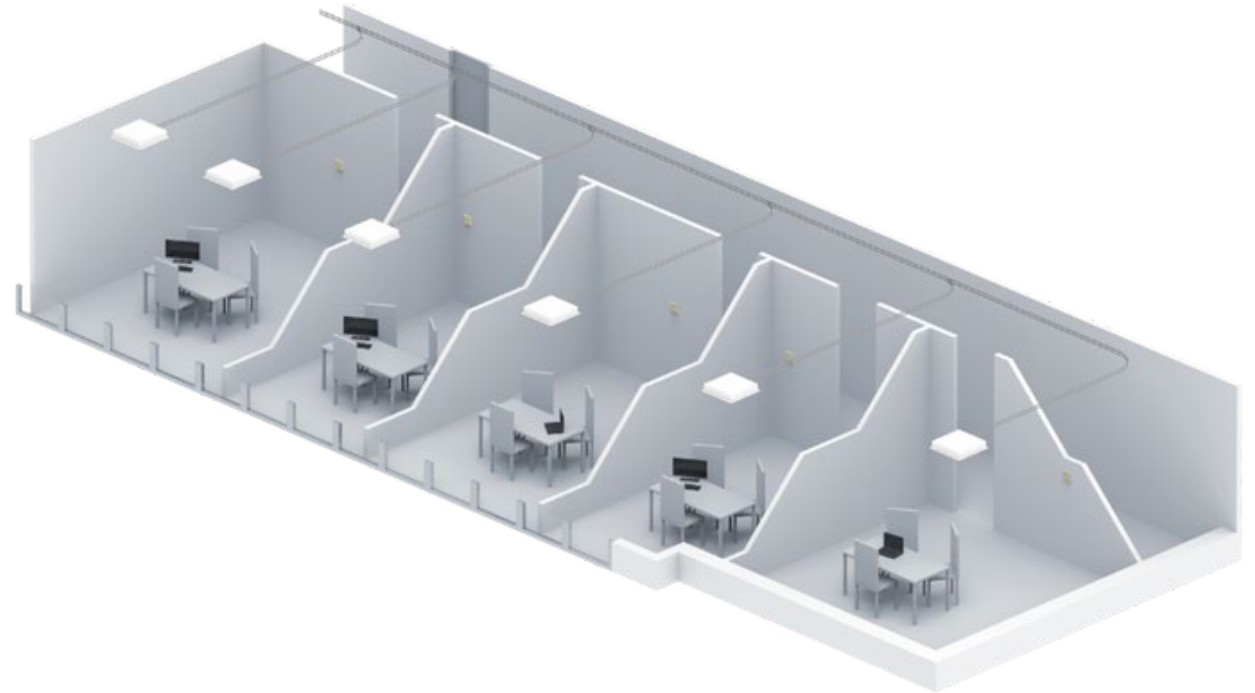


A2L Equipment



Analysis of smallest zone, with higher refrigerant concentration

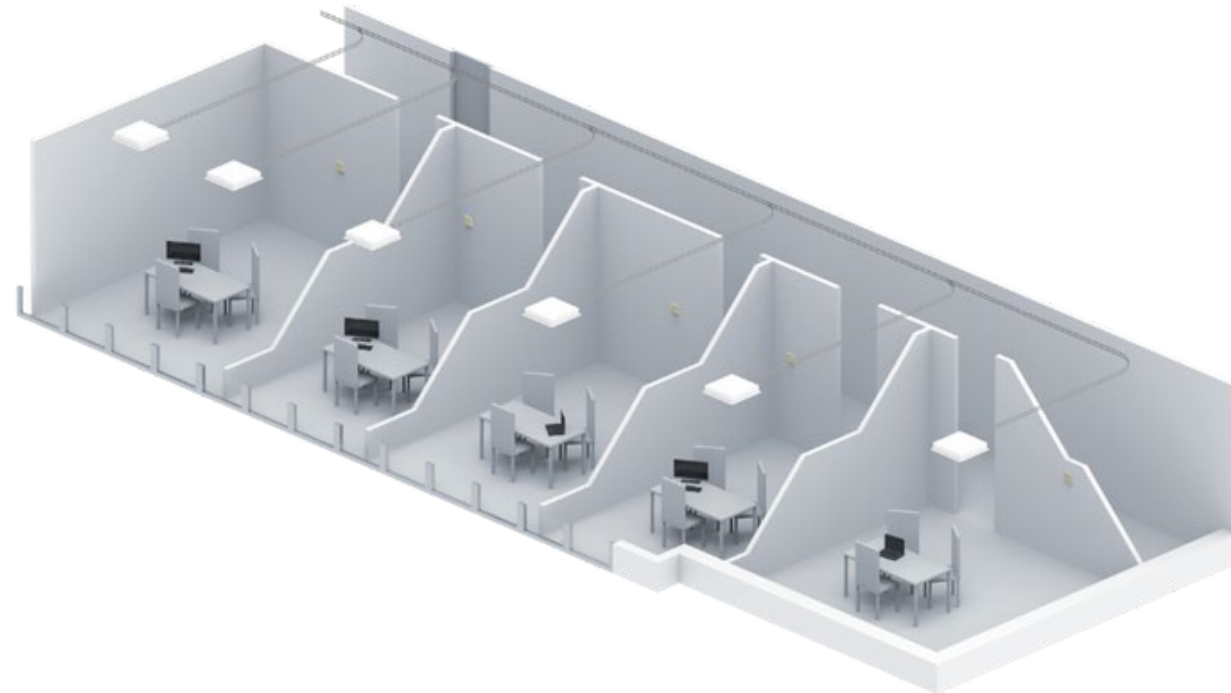
- Zone is 10x10ft
- 10 ft ceiling height
- Releasable refrigerant charge is greater than effective dispersal volume charge



Connected Spaces



- If the system uses R-32 Refrigerant
 - Total Refrigerant Charge=27lbs
 - Single Circuit: Mrel=27 Lbs
 - LFL for R-32=19.1 LBS/1000 ft³ =0.0191/lbs ft³
 - Effective Dispersal Volume Veff= 1000 ft³
 - Equipped with a refrigerant detector to initiate air circulation.
- EVDC=0.0191 lbs/ ft³ x 1000 ft³ x 0.5 x 1.0= 9.55 lbs



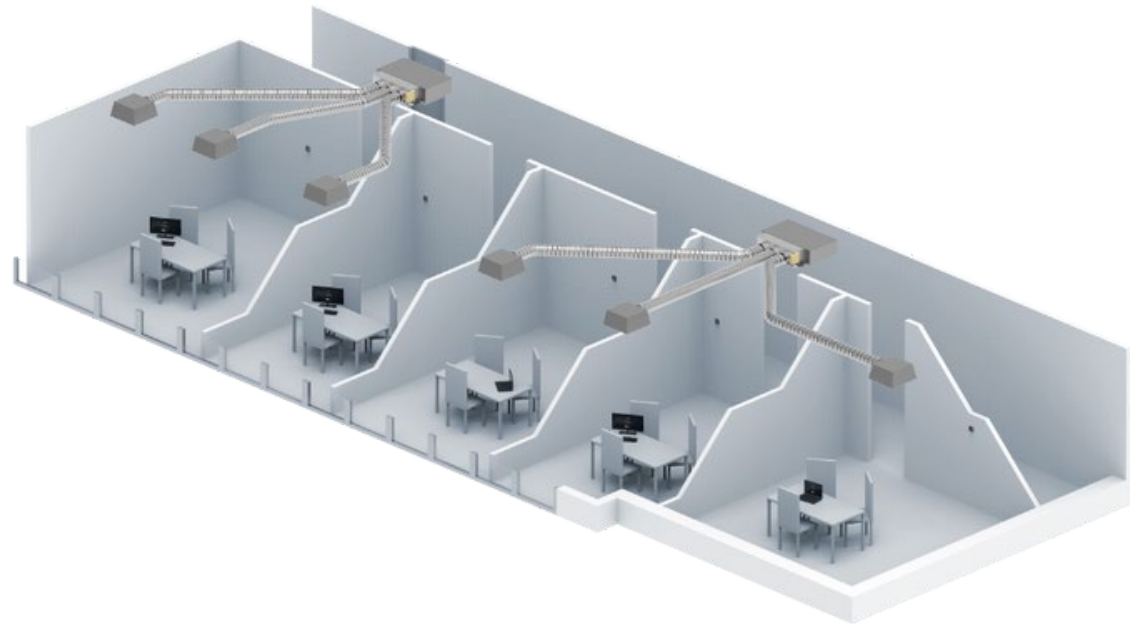
Does this installation comply with
ASHRAE 15?

Connected Spaces



Solution for commercial projects

- Less indoor units
- Reduction of refrigerant piping
- Lower refrigerant charge



Connected Spaces

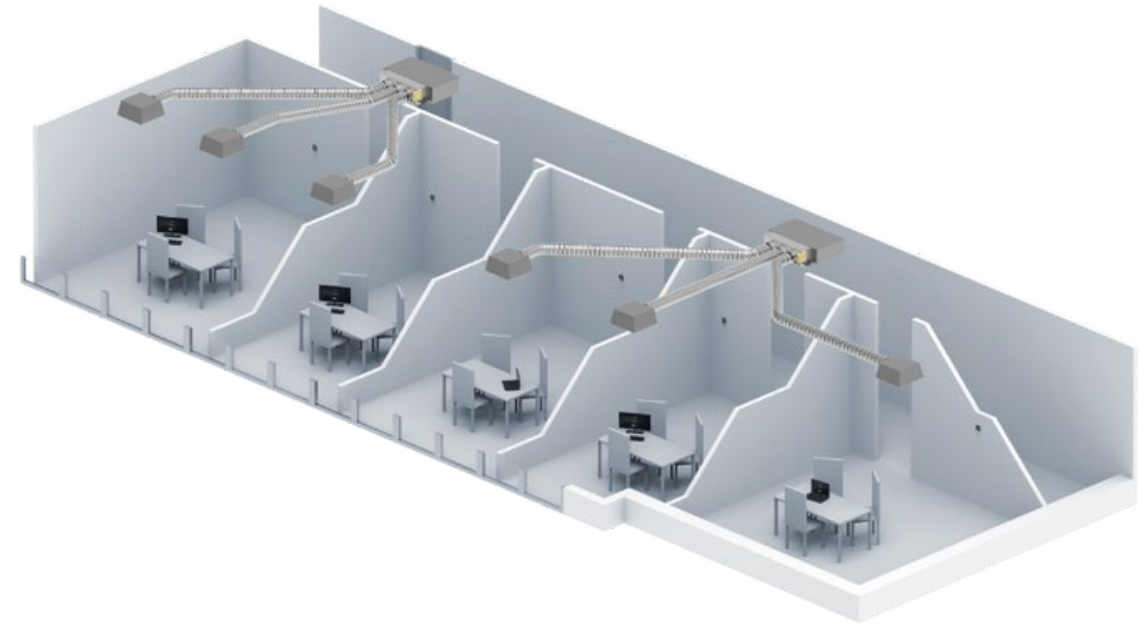


If the system uses R-32 Refrigerant

- Total Refrigerant Charge=27lbs
- Single Circuit: Mrel=27 Lbs
- LFL for R-32=19.1 LBS/1000 ft³ =0.0191/lbs ft³
- Effective Dispersal Volume Veff= 3000 ft³
Equipped with a refrigerant detector to initiate air circulation.

$$\text{EVDC} = 0.0191 \text{ lbs/ft}^3 \times 3000 \text{ ft}^3 \times 0.5 \times 1.0 = 28.65 \text{ lbs}$$

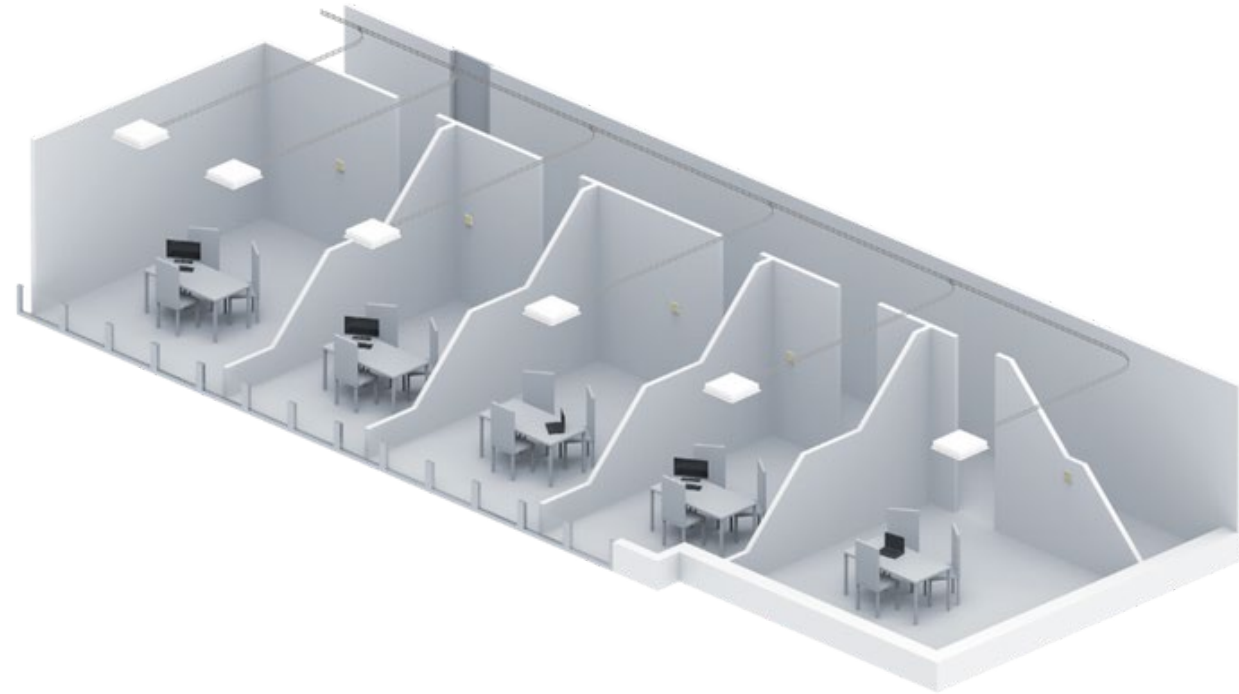
Compliance with ASHRAE 15



Mechanical Ventilation



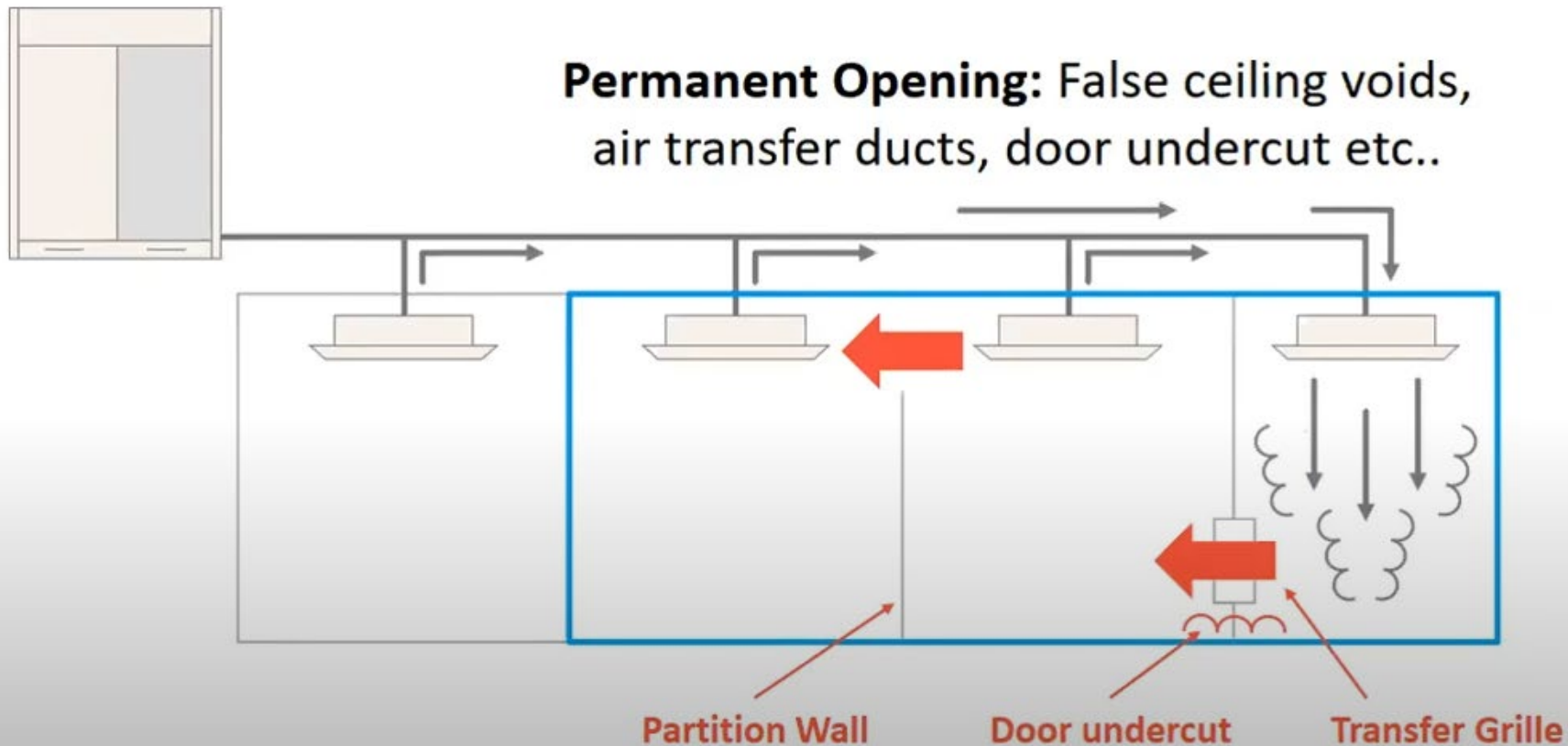
- If the system uses R-32 Refrigerant
 - Total Refrigerant Charge=27lbs
 - Single Circuit: $M_{rel}=27 \text{ Lbs}$
 - LFL for R-32=19.1 LBS
 - Effective Dispersal Volume $V_{eff}=1000 \text{ ft}^3$.
 - $EVDC=0.0191 \text{ lbs/ft}^3 \times 1000 \text{ ft}^3 \times 0.5 \times 1.0=9.55 \text{ lbs}$
 - $ms - EDVC = 27.0 \text{ lb} - 9.55 \text{ lb} = 17.45 \text{ lb}$
 - $Q_{req} = 2 \times 17.45 \text{ lb} / (4 \text{ minutes} \times 0.0191 \text{ lb/ft}^3)=456 \text{ CFM}$



DESIGN CONSIDERATIONS



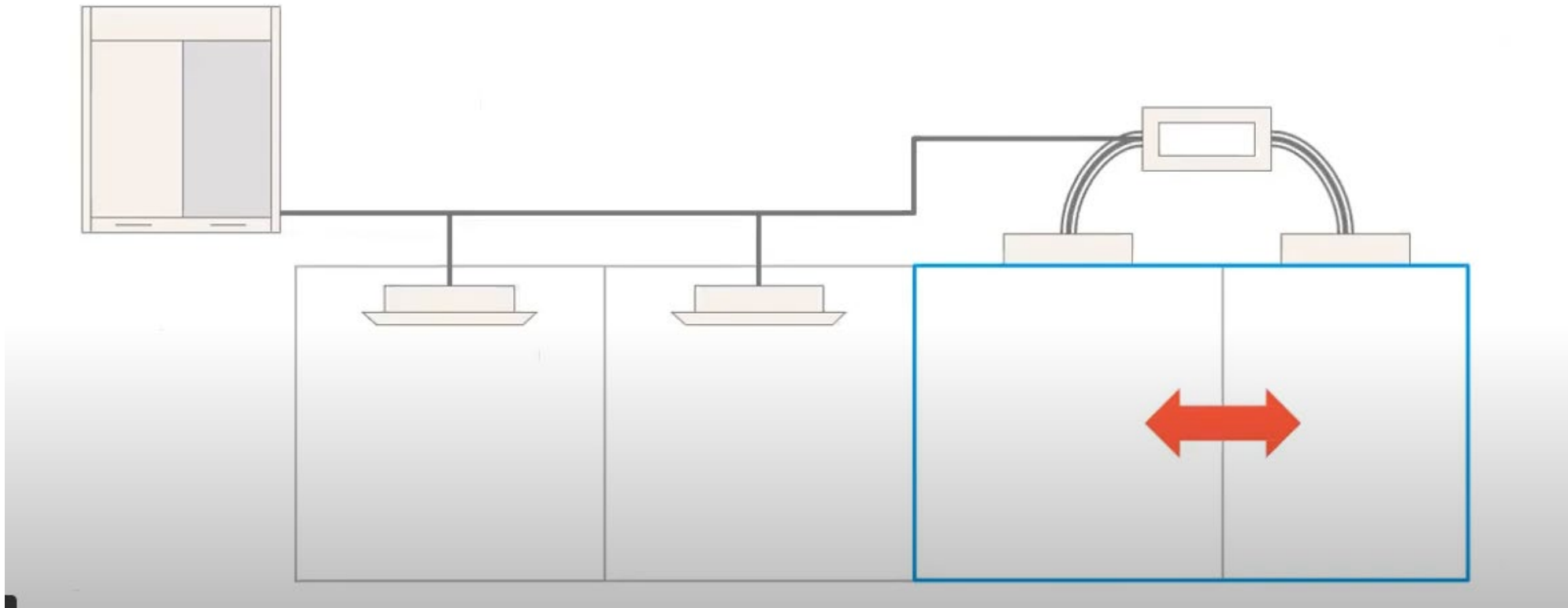
Increase the dilution volume



DESIGN CONSIDERATIONS



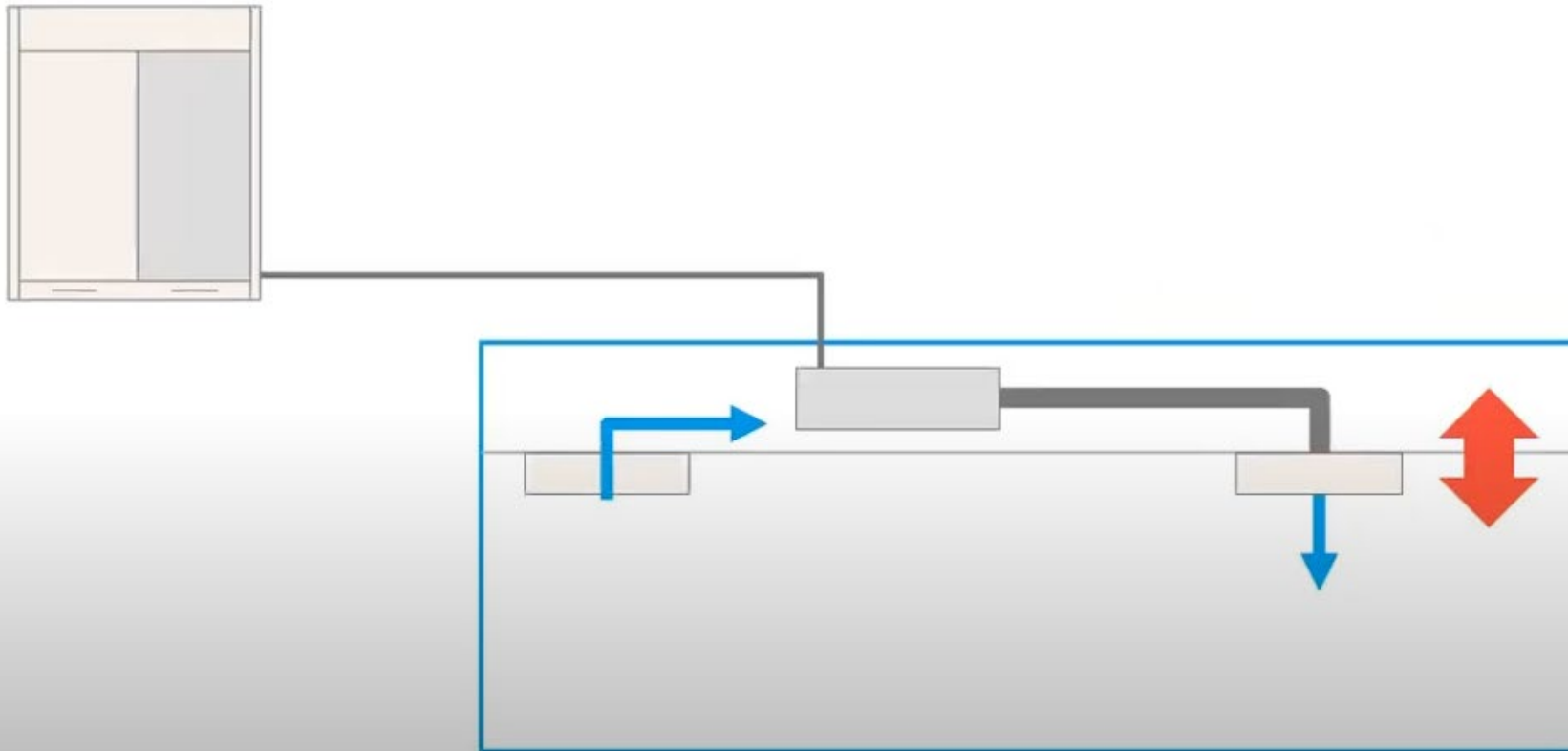
Use a ducted fan coil unit to serve multiple spaces



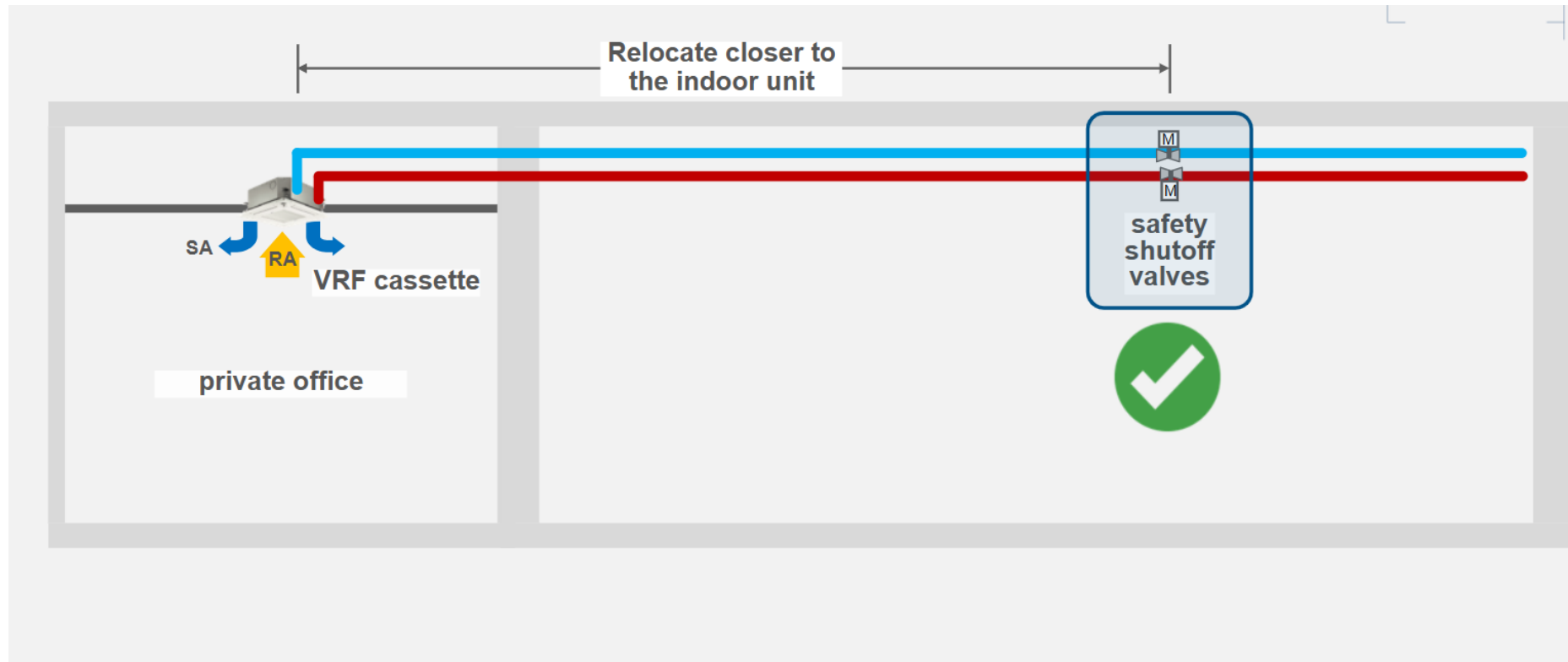
DESIGN CONSIDERATIONS



Using the void space as a plenum chamber



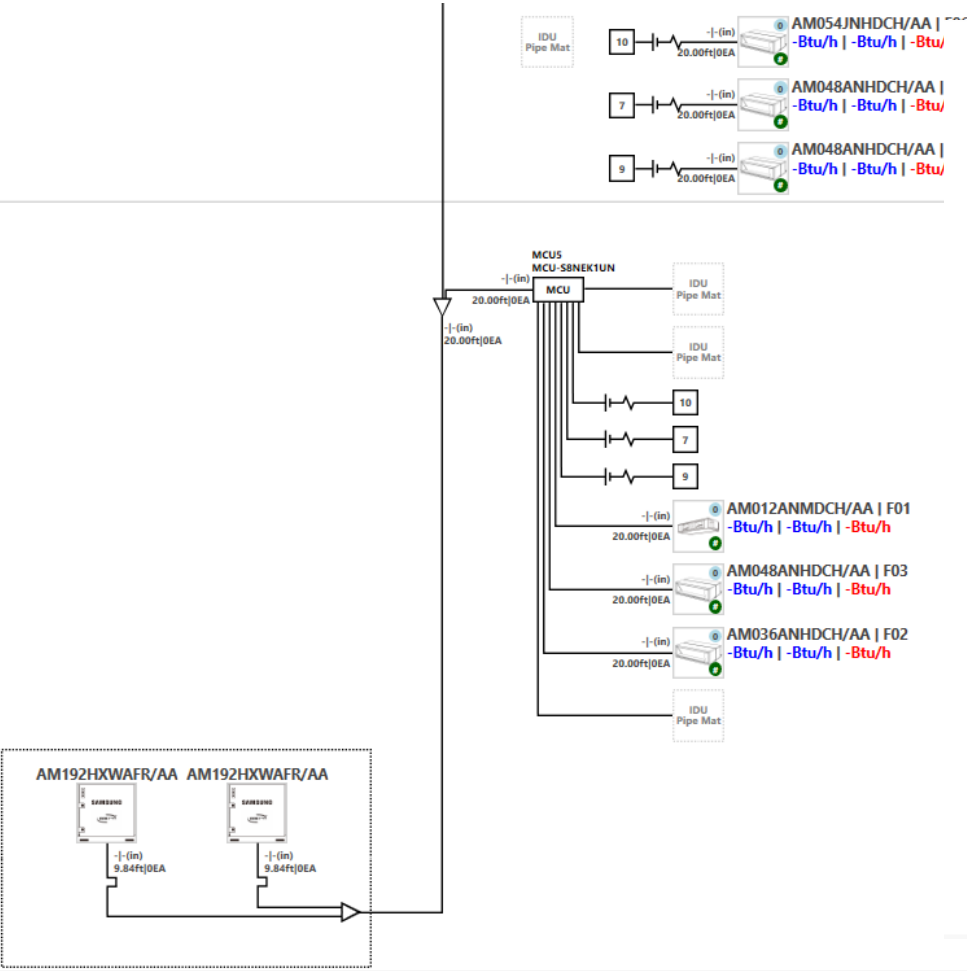
Design Considerations



WATER SOURCE VRF



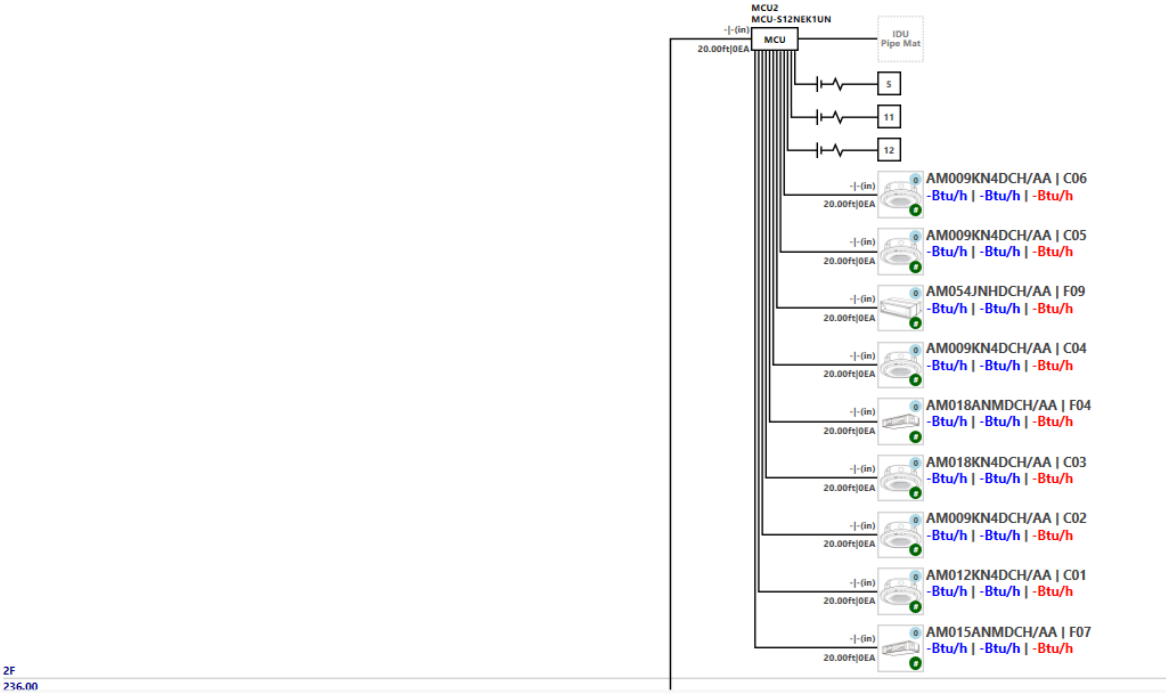
1F
118.00



3F
354.00



2F
236.00



B1
0.00

Water Source Condensers - Copy5
AM384HXWAFR2AA
-Btu/h | -Btu/h



Summary



Strategies for dealing with systems having a refrigerant charge in excess of the EDVC

- Increase the effective dispersal volume
 - Connect two or more spaces
 - Ducted units with zone damper
 - Natural ventilation
 - Mechanical Ventilation
- Decrease Releasable Refrigerant Charge
 - Specify smaller systems
 - Utilize Package Terminal Units in smaller spaces
 - Use smaller packaged equipment like water source heat pumps.

Questions



1. What is a key difference between A2L and A3 refrigerants?

- A. A2L refrigerants are more flammable than A3
- B. A2L refrigerants have a lower toxicity than A3
- C. A2L refrigerants have a much higher minimum ignition energy than A3
- D. A2L refrigerants contain propane

Questions



According to ASHRAE Standard 15, when is a refrigerant detection system (RDS) required?

- A. Always required regardless of refrigerant type
- B. Only for rooftop units
- C. When the system has a releasable charge over 4 lbs in a ducted system
- D. For systems using Class 1 refrigerants only

Questions



What standard must A2L HVAC equipment comply with to ensure safety?

- A. ASHRAE 90.1
- B. UL 1995
- C. UL 60335-2-40
- D. ISO 9001

Questions



Which method can increase the Effective Dispersal Volume (EDVC) in a space?

- A. Increase Space Volume
- B. Adding ignition sources
- C. Increasing pipe length
- D. Disconnecting ventilation systems





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Refrigerant Regulations

Design Implications

Speaker:

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