



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

April 1, 2021

Mr. Russell Tharp
Chair ASHRAE 15 Committee
180 Technology Parkway
Peachtree Corners, Georgia 30092
<https://osr.ashrae.org/>

Re: BSR/ASHRAE Standard 15.2P, *Safety Standard for Refrigeration Systems in Residential Applications*

Dear Mr. Tharp:

The U.S. Consumer Product Safety Commission (CPSC) has been actively participating in various voluntary standards related to flammable refrigerants, otherwise known as low global warming potential refrigerants. CPSC staff¹ has reviewed the recent, third public review draft of ASHRAE Standards 15.2P, *Safety Standard for Refrigeration Systems in Residential Applications*, and we support the voluntary standard. CPSC staff believes it is appropriate to separate the requirement for residential applications from ASHRAE Standard 15, *Safety Standard for Refrigeration Systems*. We believe that the requirements in the proposed standard will help keep consumers safe from situations that could arise from flammable refrigerants found in non-cord-connected refrigeration (HVAC) appliances.

CPSC staff does have some suggestions that could be addressed during the continuous maintenance of the draft standard when and if it is published:

Section A2 explains that cord-connected products are not included within the scope. Staff believes that it is very important to clarify the exclusion of cord-connected products in the Section 2 Scope, as refrigerators and other cord-connected products will use class A3 refrigerants with different requirements not included in this standard. Therefore, CPSC staff suggests adding the following, or similar language, to the Scope:

2.2 Cord-connected products are not included within the scope of this document.

Additionally, CPSC staff suggests removing: “Although the scope of ASHRAE Standard 15.2 is broad enough to encompass all refrigerants and cord-connected appliances” from Section A2, because household refrigerators are one of the most common cord-connected

¹ The views or opinions expressed in this letter are solely those of the staff, and these views do not necessarily represent those of the Commission.



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

refrigeration products, and will use A3 refrigerants, and therefore, will not meet the requirements of this draft standard.

In Section 4 Definitions, "Building Code," is not actually defined. Instead, its meaning is clarified, the term should be defined. Also, in Section 4, "M1" and "M2" should be defined, because it is important that they are understood correctly. Finally, in Section 4, please clarify whether the definition for "conditioned space" includes spaces that are only either dehumidified or humidified, but not heated or cooled.

Section 9.1 is worded awkwardly. It is unclear what must comply with the equipment manufacturer's instructions. Which process should comply with the manufacturer's instructions, the entire process, the process of adding refrigerant, or both? CPSC staff suggests changing that paragraph to: "The equipment manufacturer's installation instructions shall be complied with when refrigerant charge is added or adjusted."

If you have any questions, feel free to contact me. CPSC staff will continue to participate in various flammable refrigerant-related voluntary standards development efforts as we are able.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Ayers", is written over a light blue horizontal line.

Scott Ayers
Voluntary Standards Specialist
sayers@cpsc.gov

Cc: Patricia Edwards, CPSC Voluntary Standards Coordinator