



March 15, 2022

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 Rusty,

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

On April 1, 2021, CPSC staff provided comments during the fourth public review of this item. CPSC staff identified several issues in the proposed standard in the comments we submitted. The Standing Standard Project Committee (SSPC) 15 addressed CPSC staff's comments during a meeting on May 27, 2021, where the SSPC and staff agreed that the issues could be held until after the voluntary standard is initially published and discussed during the continuous maintenance of the standard. The issues are:

- Adding an explicit statement to the scope, placing cord-connected products, such as refrigerators outside the scope of this voluntary standard. Cord-connected products will be permitted to use class A3 refrigerants, and therefore, have other requirements not included in this standard.
- Removing the sentence, "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 refrigeration products, and will use A3 refrigerants, and therefore, will not meet the requirements of this draft standard.



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- Define the term “building code.”
- Develop industry names for “M1” and “M2,” which are both refrigerant charge designations without a name. Some may have difficulty understanding these charge designations when all the other refrigerant charge designations have names (e.g., “Mc” – refrigerant change, actual and “Mrel” – refrigerant charge releasable). These terms are used in other standards and would require broad industry acceptance.
- Clarify whether the definition of “conditioned space” includes spaces that are only dehumidified or humidified, but not heated or cooled.

If you have any questions, please contact me. CPSC staff will continue to participate in various flammable refrigerant-related voluntary standards development efforts as agency resources allow.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ayers".

Scott Ayers
Voluntary Standards Specialist
Office of Hazard Identification and Reduction

CC: Jacqueline Campbell (VoluntaryStandards@cpsc.gov) Voluntary Standards Coordinator

ⁱ 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.