



Shaping Tomorrow's Global Built Environment Today

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Bill McQuade
ASHRAE Society President, 2025-2026

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December 26, 2025

U.S. Environmental Protection Agency (EPA)
EPA Docket Center – Air and Radiation Docket (Mail Code 28221T)
1200 Pennsylvania Avenue NW, Washington, DC 20460

Re: **Protection of Stratospheric Ozone: Listing of Substitutes Under the Significant New Alternatives Policy Program in Refrigeration and Air Conditioning and Fire Suppression; Docket ID No. EPA HQ-OAR-2024-0503; 90 Fed. Reg. 50,766 (Nov. 10, 2025)**

Submitted electronically through the Federal eRulemaking Portal at <http://www.regulations.gov>

To Whom It May Concern:

Thank you for the opportunity to provide input on the Environmental Protection Agency (EPA) proposed rule issued November 10, 2025, “Protection of Stratospheric Ozone: Listing of Substitutes Under the Significant New Alternatives Policy Program in Refrigeration and Air Conditioning and Fire Suppression.”

ASHRAE, founded in 1894, is a professional and technical society of more than 54,000 members who focus on building systems, energy efficiency, indoor air quality, refrigeration and resiliency within the built environment. Through research, standards writing, publishing and continuing education, ASHRAE shapes tomorrow's built environment today.

ASHRAE appreciates and supports EPA's reference to ANSI/ASHRAE Standard 15-2024 for the application of R-516A for use in the centrifugal chillers and positive displacement chillers end-uses. ASHRAE is actively engaged in the development of robust, voluntary, consensus-based standards for the built environment that focus on heating, ventilating, air-conditioning, and refrigeration. Voluntary consensus standards such as ANSI/ASHRAE Standard 15-2024 are developed through the participation of qualified, interested, and affected stakeholders including manufacturers, distributors, consumers, users, advocacy organizations, and representatives of government and academia. ANSI/ASHRAE Standard 15-2024 specifies the safe design, construction, installation, and operation of refrigeration systems. It applies to mechanical and absorption refrigeration systems; to modifications including replacement of parts or components; and to substitutions of refrigerant with a different designation. While we support EPA's reference to ANSI/ASHRAE Standard 15-2024, ASHRAE also understands that some industry stakeholders are requesting solutions from EPA to address a recurring misalignment issue between SNAP standard references and the latest editions of the standards. ASHRAE supports EPA addressing this misalignment issue for stakeholders while ensuring that updated editions of ASHRAE standards are being applied.

EPA also proposes to list multiple refrigerants as acceptable, subject to use conditions, for specific end-uses. EPA notes that one of the refrigerants, HCR 4141, has not yet been reviewed by the ASHRAE 34 committee and explains that all of its components have been previously classified as A for toxicity and 3 for flammability. ASHRAE opposes the listing of refrigerants that have not been reviewed by ASHRAE Committee 34. ANSI/ASHRAE Standard 34-2024, Designation and Safety Classification of Refrigerants, specifies a uniform system for assigning reference numbers, safety classifications, and concentration limits for refrigerants. Safety classifications and refrigerant concentration limits are determined based on toxicity and flammability data vetted by experts that have been appointed to the standard committees. The 2024 edition of Standard 34 adds safety designations for 28 new refrigerants, adds new data for flammable refrigerants, and modernizes the application requirements for new refrigerants. It also publishes additional data required to apply refrigerant blends as part of its review, including the lower flammability limit (LFL) and refrigerant concentration limit (RCL). As such, ASHRAE does not endorse refrigerants that have not gone through this classification process, nor do we support any claims of performance, toxicity, flammability, safety, and compatibility with new or existing systems. It is critical that EPA ensures refrigerants are incorporating these widely used safety standards so that we provide a clear framework for safe application of refrigerants in homes and businesses across the country.

Thank you for considering ASHRAE's comments on this proposed rulemaking. We appreciate your consideration and would be happy to provide any additional information needed. If you would like any clarification on the submitted response or have any other questions, please do not hesitate to contact me or have your staff contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill McQuade". The signature is fluid and cursive, with the first name "Bill" being the most prominent part.

Bill McQuade
ASHRAE Society President, 2025-2026