



Washington State Council of Fire Fighters

Affiliated with: AFL-CIO
International Association of Fire Fighters
Washington State Labor Council

September 12, 2019

Washington State Building Code Council
1500 Jefferson St SE
PO Box 41449
Olympia, WA 98504-1449

Dear Members of the Washington State Building Code Council:

On behalf of the Washington State Council of Fire Fighters (WSCFF), representing 8500 professional fire fighters in Washington State, I am writing to ask that the Washington State Building Code Council delay a vote on the new product safety standards for air conditioning equipment (UL 60335-2-40) for 2019, which is currently scheduled for tomorrow, Friday, September 13, 2019.

The proposed updated standard would switch the current refrigerant to a A2L refrigerant, which is flammable. This new standard, which permits for the first time the use of A2L refrigerants in residential air conditioning equipment, poses a potential risk to public safety. I respectfully request your consideration to delay the vote based on the following:

Research on these refrigerants is ongoing, including studies to determine whether the current risk mitigation scheme used for the UL standard would work with this flammable refrigerant. Without validating the risks, these new standards could put Washingtonians at a greater risk than other U.S. citizens.

The installation criteria of these A2L refrigerants is still in development, meaning inspectors do not have regulations to effectively manage new risks associated with flammable refrigerants. Due to the lack of collaboration and research, enabling the use of flammable refrigerants is premature.

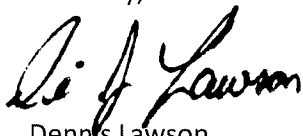
Furthermore, the amounts of refrigerant in these air conditioning systems may be substantial as this new standard allows for very large quantities of A2L refrigerant. Since the dangers posed by using large amounts of flammable refrigerants in residential properties is not sufficiently tested, this puts Washingtonians and fire fighters at risk.

To date, the fire service has been unable to engage industry on the use of A2L refrigerants in residential environments. We ask you to delay this decision so that impacted stakeholders, including fire fighters and fire chiefs sworn to protect public safety, may work with the industry to address the concerns outlined in this letter and other public safety issues related to A2L refrigerants.

The health and safety of the public and our members are the WSCFF's highest priorities. While we understand the desire and need to adopt more eco-friendly standards for a healthier planet, industry professionals must collaborate with the fire service to ensure these standards do not come at the expense of public safety or fire fighters.

We ask you delay the vote on the updated UL 60335-2-40 product safety standards so that time can be given for this needed collaboration between industry and the fire service to occur. Without further study and careful consideration, the results of A2L refrigerants in citizen's homes could be disastrous.

Sincerely,

A handwritten signature in black ink that reads "Dennis Lawson". The signature is written in a cursive, flowing style.

Dennis Lawson
President

cc: Members, Washington State Congressional Delegation