



Shaping Tomorrow's Global Built Environment Today

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ASHRAE Society President, 2025-2026

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August 26, 2025

Mr. Ben Kochman
Acting Administrator
U.S. Department of Transportation,
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue SE,
Washington, DC 20590

Re: **Hazardous Materials: Adoption of Department of Transportation Special Permit 21379 (Docket Number PHMSA-2025-0102)**
Hazardous Materials: Adoption of Department of Transportation Special Permit 21287 (Docket Number PHMSA-2025- 0101)

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

Dear Acting Administrator Kochman:

Thank you for the opportunity to provide input on two notices of proposed rulemakings issued on July 1, 2025 by the Pipeline and Hazardous Materials Safety Administration (PHMSA) titled:

- “Hazardous Materials: Adoption of Department of Transportation Special Permit 21379” and
- “Hazardous Materials: Adoption of Department of Transportation Special Permit 21287”

These proposed rulemakings seek to adopt the provisions of DOT special permit (SP) 21379 and 21287 into the hazardous materials regulations (HMR) to streamline the transportation of large and small refrigerating machines filled with certain flammable gases.

ASHRAE is providing comments on an element of the rulemaking which references ANSI/ASHRAE Standard 15-2019, *Safety Standard for Refrigeration Systems*, and Standard 34-2019, *Designation and Safety Classification of Refrigerants*, in the amended HMR.

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 PHMSA referencing ANSI/ASHRAE Standard 15-2019 and Standard 34-2019 in the proposed rulemakings. As you may be aware, 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.

ANSI/ASHRAE Standard 15-2019 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 number designation. ANSI/ASHRAE Standard 15 is used in conjunction with ANSI/ASHRAE Standard 34, which 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. These are widely used safety standards that provide a clear framework for safe application of refrigerants in homes and businesses across the country. I would also note the U.S. Environmental Protection Agency (EPA) references ASHRAE refrigerant designations and safety classifications, as well as ASHRAE safety standards, in its Significant New Alternatives Policy (SNAP) regulations that identify which next generation refrigerants are acceptable or unacceptable for specific applications.

However, these standards have been updated considerably since the 2019 edition. Voluntary consensus technical standards are developed through the participation of qualified, interested, and affected stakeholders including manufacturers, consumers, users, advocacy organizations, and representatives of government and academia. Through this development process, ASHRAE has published the 2024 edition of these two refrigerant standards, ANSI/ASHRAE Standard 15-2024 and ANSI/ASHRAE Standard 34-2024. 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. The updates also provide consistency throughout Standard 15 to further harmonize with Standard 34. As such, we recommend PHMSA reference the 2024 edition of the ANSI/ASHRAE Standards 15 and 34, rather than the 2019 edition.

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 McQuinn". The signature is fluid and cursive, with a large initial "B" and "M".

Bill McQuade
ASHRAE Society President, 2025-2026