



# Shaping Tomorrow's Global Built Environment Today

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Bill McQuade  
ASHRAE Society President, 2025-2026

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December 18, 2025

Jerry Bitner  
Presiding Officer  
Air Conditioning and Refrigeration Contractors Advisory Board  
Texas Department of Licensing and Regulation  
PO Box 12157  
Austin, TX 78711

Re: Refrigerant Requirements in the Texas State Code

Dear Mr. Bitner,

I am contacting you from ASHRAE, founded in 1894, which is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 53,000 members, including over 2,700 in Texas, focus on building systems, energy efficiency and refrigeration. ASHRAE has multiple standards that address refrigerant safety and management:

- ANSI/ASHRAE Standard 15-2024, *Safety Standard for Refrigeration Systems*, which specifies the safe design, construction, installation, and operation of refrigeration systems.
- ANSI/ASHRAE Standard 15.2-2024, *Safety Standard for Refrigeration Systems in Residential Applications*, which accommodates the use of A2L-classified refrigerants in low-rise residential applications and is intended for use by manufacturers, installers, contractors, service technicians, building code officials, and others.
- ANSI/ASHRAE Standard 34-2024, *Designation and Safety Classification of Refrigerants*, which specifies refrigerant properties and a refrigerant classification system. It assigns safety classifications, lower flammability limits, and refrigerant concentration limits based on toxicity and flammability data.

**I am writing to bring to your attention an issue regarding the State of Texas's refrigerant management requirements.** Texas has adopted the International Mechanical Code, 2021 edition, which references the 2019 editions of ASHRAE Standards 15 and 34. However, essential updates have since been made to those standards in 2022, and again in the latest 2024 editions. Standards 15 and 34 were revised and updated in 2024 to address a wider range of refrigerants, including those with lower global warming potential (A2L refrigerants), as well as to clarify safety mitigation requirements. The 2024 edition of Standard 34 adds safety designations for 28 new refrigerants and modernizes the application requirements for new refrigerants. The 2024 edition of Standard 15 was also revised to better align with the model codes; many of these changes have already been approved as part of the 2027 model code update cycle.

**Because Texas requires compliance with the 2019 edition of ASHRAE's refrigerant standards, rather than the current 2024 editions, it is out of sync with the latest industry best practices. The 2024 editions of ASHRAE Standards 15 and 34 provide essential guidance to manufacturers, design engineers and operators who need to stay current with new air conditioning and refrigerating requirements, and we urge Texas to adopt these latest editions of the standards as soon as possible.**

ASHRAE can offer member experts from our relevant technical committees to help address questions and issues related to refrigerant management, and serve as a technical resource regarding the implementation of refrigerant requirements. If you need any additional information, please contact [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org). Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill McQuade", with a stylized flourish at the end.

Bill McQuade  
ASHRAE Society President, 2025-2026