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Bill McQuade
ASHRAE Society President, 2025-2026

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November 14, 2025

Greg Gilbert
State Building Official
Office of Community Affairs
127 State House Station
Augusta, ME 04333

Re: State Refrigerant Requirements

Sent via email to: codes.MOCA@maine.gov

Dear Mr. Gilbert,

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 nearly 200 in Maine, 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 Maine's refrigerant management requirements. Maine has adopted the International Mechanical Code 2024 edition as part of the Maine Uniform Building and Energy Code (MUBEC), which references the 2022 editions of ASHRAE Standards 15 and 34. However, essential updates have since been made to those standards 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 for high-probability systems and machinery rooms. The 2024 edition of Standard 15 was also revised to better align with the model codes. The 2024 edition of Standard 34 adds safety designations for 28 new refrigerants and

modernizes the application requirements for new refrigerants. Many of these changes have already been approved as part of the 2027 model code update cycle.

Because the state requires compliance with the 2022 edition of these standards rather than the current 2024 editions, engineers must show code compliance with the IMC 2024/ASHRAE 15-2022 for each of their projects, or provide modification requests to their city, county or other jurisdiction to be able to use the 2024 edition. Some local jurisdictions will not accept the 2024 editions as compliant unless those editions are codified at the state level.

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 Maine 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.

Thank you for your consideration.

Sincerely,

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

Bill McQuade
ASHRAE Society President, 2025-2026