



Mechanical Contractors Association of South Florida

September 27, 2024

Submitted via email to mo.madani@myfloridalicense.com

Mr. Mo Madani

Florida Building Commission
2601 Blair Stone Rd.
Tallahassee, FL 32399

Subject: Support for proposed M- FBC- Glitch #3

Dear Mr. Madani,

I'm writing on behalf of the mechanical contractors represented by the Mechanical Contractors Association of South Florida, who perform work throughout the state of Florida, to express our strong support for the proposed Third Glitch Amendment to the 8th Edition (2023) of the Florida Building Code, submitted by Mrs. Hickman.

With the January 1, 2025, deadline approaching for implementation of EPA restrictions on hydrofluorocarbons under 40 CFR 84.54, there is an urgent need to address this issue. Other codes, such as the Florida Building Code and the Florida Fire Prevention Code, may also impact the implementation of A2L refrigerants and may also require additional updates.

Of specific concern is the potential use of restrictions in the 2023 Florida Mechanical Code, where, in the event of a conflict, the most restrictive standard should apply:

- The Florida Mechanical Code [Table 1104.3.2] limits the amount of an A2 (and consequently A2L) refrigerant in commercial applications to 6.6 lbs. The 2021 IMC, on which the 2023 FMC is based, maintains the same limit.

We understand that, according to section [A]102.1 of the Florida Building Code, code enforcement officers are required to enforce the more restrictive 6.6 lb. limit which raises various concerns for commercial applications. This discrepancy underscores the urgency of adopting ASHRAE 15-22, which should resolve this issue.

Given these considerations, we urge the Mechanical TAC and the Commission to approve updating the ASHRAE 15 reference to the 2022 Edition (ASHRAE 15-22), including all addenda issued through July 31, 2024. We appreciate the efforts of all parties involved in addressing this matter.

Respectfully,

A handwritten signature in blue ink that reads "Julie C. Dietrich".

Julie C. Dietrich
Executive Vice President
Mechanical Contractors Association of South Florida