



State of Idaho
Division of Occupational and Professional Licenses
Heating, Ventilation and Air Conditioning Board

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To: Idaho HVAC Industry

Re: Refrigerant Transitions in New Air Conditioning & Refrigeration Equipment

Pursuant to current and forthcoming federal regulations under the American Innovation and Manufacturing Act of 2020 (42 U.S.C. § 7675), manufacturers of heating, ventilation, air conditioning, and refrigeration (HVACR) equipment are beginning to transition to new classes of substitute refrigerants in newly manufactured equipment.

According to the Air Conditioning, Heating, and Refrigeration Institute (AHRI), this transition will commence not later than mid-2024, with manufacturers ceasing to manufacture and retailers ceasing to stock and sell new air conditioning and refrigeration equipment containing older classes of refrigerants. The anticipated effective date of the forthcoming regulations is January 1, 2025.

To avoid a disruption in the supply, sale, installation, and servicing of new air conditioning and refrigeration equipment in Idaho, the Idaho Division of Occupational and Professional Licenses (Division) and the Idaho Heating, Ventilation and Air Conditioning Board (Board) are writing this letter to provide its interpretation of Idaho state and local laws and code provisions.

As this transition to new classes of refrigerants commences, the Division and the Board believe that no code provision or other state or local law in Idaho prevents the use of any refrigerant in air conditioning and refrigeration equipment that is approved pursuant to Section 105.2 of the 2018 International Mechanical Code.¹

Section 105.2 reads:

Alternative materials, design and methods of construction and equipment.

The provisions of this code are not intended to prevent the installation of any material or to prohibit any design or method of construction not specifically prescribed by this code, provided that any such alternative has been *approved*. An alternative material, design or method of construction shall be *approved* where the code official finds that the proposed design is satisfactory and complies with the intent of the provisions of this code, and that the material, method or work offered

¹ Section 105.2 of the 2018 Idaho Mechanical Code was adopted and is incorporated by reference by the Idaho HVAC Board in Rule 002.01 of IDAPA 24.39.70.

is, for the purpose intended, not less than the equivalent of that prescribed in this code in quality, strength, effectiveness, fire resistance, durability and safety. Where the alternative material, design or method of construction is not *approved*, the code *official* shall respond in writing, stating the reasons why the alternative was not *approved*.

Pursuant to Section 105.2, the Division, as the code official, has approved for installation any new equipment listed to UL 60335-2-40 & 89, as well as any design and installation requirements in compliance with ASHRAE 15, as an approved alternative to UL 1995. This approval applies to HVACR installations in any Idaho jurisdiction where the Division is the code official.

Local governments that have adopted and are enforcing the codes and amendments prescribed by Title 54, Chapter 50, Idaho Code, are encouraged to consider and approve such installations within their jurisdictions.

If there are any questions relating to this subject matter, please feel free to contact me.

Respectfully,

John Nielsen
Executive Officer/HVAC Program Manager