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April 22, 2025

Re: A2L Refrigerants – Alternative Materials Request Clarification

All code users,

The purpose of this letter is to provide additional clarification regarding our July 19, 2023, letter relating to the use of A2L refrigerants.

The previous letter indicated the Department of Housing, Buildings and Construction’s opinion that no code provision or other state or local law in Kentucky prevents the use of any refrigerant in air conditioning and refrigeration equipment that is approved through alternative materials, methods, equipment and appliances requests pursuant to Section 104.11 of the 2018 Kentucky Building Code (“KBC”), Section 105.2 of the 2015 International Mechanical Code (“IMC”), and Section R104.11 of the 2018 Kentucky Residential Code (“KRC”).

While the previous letter also 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, an edition of ASHRAE 15 was not identified. An acceptable alternative installation standard for equipment and appliances utilizing A2L refrigerants is the 2022 ASHRAE 15 or the 2024 IMC under this approval pursuant to 2018 KBC 104.11; 2015 IMC 105.2; and 2018 KRC R104.11.

Sincerely,

Mark Hayden, Director
Division of HVAC

Gary Feck, Director

Division of Building Code Enforcement