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180 Technology Parkway, NW • Peachtree Corners, GA 30092-2977 • Tel: 404.636.8400 • Fax: 404.321.5478
www.ashrae.org

M. Dennis Knight
2024-2025 ASHRAE President

Whole Building Systems, LLC
921 Pitt St.
Mt. Pleasant, SC 29464
Phone: (843)437-3647
Email: dknight@wholebuildingsystems.com

April 3, 2025

The Honorable Shelley B. Mayer
Chair
Education Committee
New York Senate
Washington Ave and State St.
Albany, NY 12224

Re: S. 3107, "School Ventilation and Energy Efficiency Assessment, Repair and Verification Program"

Dear Chair Mayer:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers, to provide comments on Senate Bill 3107, regarding HVAC infrastructure improvement projects in schools, which is currently under consideration by the Education Committee. **ASHRAE supports the goals of the legislation, which is intended to provide healthy, safe and energy efficient school facilities in New York.** We applaud these efforts. In particular, we are pleased to see that the bill is focused on infrastructure improvements for HVAC systems in schools. Proper design, installation, inspection, and maintenance of HVAC systems are essential to providing good indoor air quality (IAQ).

As a technical society that exists to serve humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields, **we support the inclusion of ASHRAE standards and publications in this legislation, and also offer a recommendation to further strengthen the bill.** ASHRAE is a not-for-profit technical and professional society of more than 55,000 members, including more than 2,000 members in New York. ASHRAE develops consensus-based building standards, including those on energy efficiency, indoor air quality, and sustainability.

We support the legislation's reference and inclusion of the following ASHRAE standards:

- **ANSI/ASHRAE Standard 52.2-2017, *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size*.** This standard is a valuable tool for measuring the performance of certain air cleaning devices. We appreciate this standard is referenced in the bill's definitions section.

- **ANSI/ASHRAE Standard 62.1-2022, *Ventilation and Acceptable Indoor Air Quality*:** Standard 62.1 specifies minimum ventilation rates and other measures intended to provide indoor air quality that is

acceptable to human occupants and minimizes adverse health effects due to poor IAQ. It defines the requirements for ventilation and air-cleaning system design, installation, commissioning, and operations and maintenance. We appreciate that Section 8 is referenced in the legislation, and we note that compliance with the full standard would further improve IAQ.

- **ANSI/ASHRAE Standard 180-2018, *Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems*:** The use of Standard 180 will help ensure that the infrastructure improvements provided by this program will continue to be well operated and maintained. Standard 180 gives details on how to implement inspection and maintenance practices, provides a list of the necessary tasks, and includes informative appendices with examples of situations in which a maintenance plan should be reviewed. We appreciate this standard being incorporated by reference, and we request that the bill text also specify "the latest edition" of Standard 180. (This is currently the 2018 edition.)

- **ASHRAE Technical Committee 9.7, *Educational Facilities Design Guidance for Education Facilities: Prioritization for Advanced Indoor Air Quality* (2023):** This document was developed by the ASHRAE technical committee that is concerned with the application of heating, ventilating, air-conditioning, refrigeration, life safety, and energy conservation systems to educational facilities. It includes checklists to help schools prioritize equipment testing and upgrades to improve IAQ.

We also recommend the addition of ASHRAE Standard 241-2023, *Control of Infectious Aerosols,* to this bill. This standard focuses on airborne infection risk mitigation. It establishes minimum requirements for building owners, operators and professionals to improve IAQ by reducing the risk of airborne disease transmission by infectious aerosols. Standard 241 is meant to be applied in periods of elevated risk, for example the risk of transmission of pathogens like the SARS-COV-2 virus, which causes COVID-19. Under these conditions, buildings would operate in "Infection Risk Management Mode," and building operators would have the flexibility to choose between different equivalent clean air options based on what they determine is appropriate for that type of space, along with their specific energy use goals or cost restrictions. This flexibility makes Standard 241 a powerful tool for mitigating transmission risk that can be adapted for specific circumstances.

Thank you for your consideration of ASHRAE's comments regarding Senate Bill 3107. ASHRAE would be pleased to serve as a technical resource and to answer any questions you might have. We are delighted that New York is moving forward to improve its school facilities for students, teachers, and staff. ASHRAE looks forward to being a technical resource as you consider this as well as other legislation concerning building systems and their impact on indoor air quality. If you need additional information or would like to be connected to a technical expert, please contact GovAffairs@ashrae.org.

Sincerely,

M. Dennis Knight
2024-2025 ASHRAE President