



Administrative Policy

Policy Number: 2025.01-IE

Effective Date: January 1, 2025

Revision Dates: N/A

Contacts:

City of Tucson
520-790-5550

Pima County
520-724-9000

Marana
520-382-2600

Oro Valley
520-229-4800

Sierra Vista
520-458-3315

Sahuarita
520-822-8866

South Tucson
520-792-2424

Policy Title: Alternative Refrigerants

Applicable Code Sections: International Mechanical Code Chapter 11
International Residential Code Chapter 14

Purpose: To establish a common set of regulations for the design and installation of cooling systems utilizing alternative refrigerants as mandated by the United States Environmental Protection Agency (EPA).

Policy: Cooling systems may be designed and installed in accordance with the currently adopted International Mechanical Code (or International Residential Code as applicable) or the most current edition of ANSI/ASHRAE 15 with the companion standard ANSI/ASHRAE 34.

Background: On October 24, 2023, the EPA published a final rule restricting the production and use of hydrofluorocarbon (HFC) refrigerants for residential and light commercial heating ventilation and air conditioning (HVAC) systems through the [Technology Transitions Program](#). The rule, as originally issued, placed restrictions on both the manufacture and installation of HVAC products and systems beginning on January 1, 2025, utilizing HFC refrigerants. Alternative refrigerants that meet these new requirements are also new to the building and mechanical codes. While the newest building safety standards address how systems using these new refrigerants must be designed and installed, local authorities having jurisdiction (AHJ) may not have the new regulations adopted or implemented yet. For local AHJs to continue using their existing building safety codes, an option is needed for the refrigeration sections of those codes.

Process: Permit applicants seeking to use alternative refrigerants that are not identified in the adopted building safety codes shall declare the use of ANSI/ASHRAE 15 with the companion standard ANSI/ASHRAE 34 for refrigerant system designs on permit application and/or the construction documents prior to submitting a permit application.

Additional EPA Links:

<https://www.epa.gov/climate-hfcs-reduction/frequent-questions-phasedown-hydrofluorocarbons>

<https://www.epa.gov/climate-hfcs-reduction/background-hfcs-and-aim-act>

<https://www.epa.gov/climate-hfcs-reduction/technology-transitions>