

Attention AAON Representative Organizations

Urgent call to action for the HVAC industry

The American Society of Mechanical Engineers (ASME) is considering a scope change to its Boiler and Pressure Vessel Code (BPVC) Section VIII, Rules for Construction of Pressure Vessels, Division I that would eliminate long-standing exemptions for equipment manufactured in the HVAC and water heating industry. The proposed change covers three exemptions for these industries but only one of these concerns AAON products.

There has been an exemption to the BPVC that excludes pressure vessels with an internal diameter not exceeding 6" regardless of length (commonly known as the 6" exemption) from ASME requirements. ASME requirements include an ASME stamp on all pressure vessels. This ASME stamp requires that the vessel is assembled by an ASME certified technician and inspected by an ASME inspector. This increases the cost of these components significantly. The most obvious use of this exemption is for receiver tanks. However, the exemption also covers tube/fin coils, microchannel coils, brazed plate heat exchangers, filter driers, accumulators, suction filters, etc. Without the 6" exemption that we have today, all these components would be subject to ASME requirements. The ASME BPVC is referenced in most building codes so most locations in the US and Canada would be subject to this scope change in the BPVC if it is approved.

Since AAON manufactures tube/fin coils, we would have to get ASME certification for our coils which would include ASME certification for our technicians and assemblers as well as having ASME inspectors inspecting our coils. This will add significant cost to our coils that we will have to pass along to our customers.

The 6" exemption has existed for over 75 years. Our equipment safety standards (UL 1995 for R410A equipment and UL 60335-2-40 for R454B equipment) are ANSI accredited and already cover the appropriate measures to ensure that equipment is designed for appropriate safety. The Occupational Safety and Health Administration (OSHA) has a database that contains 122 reports of injuries or deaths related to pressure vessels and none of those are related to HVAC equipment.

Equipment manufacturers have been disputing this issue with ASME for several years, yet ASME is proceeding with this change in scope. They have released this proposed scope change for public comment and will be accepting comments until Tuesday December 31 at 5pm Eastern time.

Our industry really needs to generate a large number of comments to ASME in opposition to this proposed scope change to help change their viewpoint. It would be helpful to have thousands of comments that they would then have to review. We ask that each of your companies make as many comments in opposition to this scope change as possible and encourage your colleagues to do the same. We would like the comments to be different so

that they can't just group them all together as they might do if they all look the same. You should comment on how this would affect your business and your customers without any additional benefit.

It is especially important to comment if any of you are ASME members, and to say that you are an ASME member, as ASME highly weights the comments of its members.

Send public comments to Steven Rossi at [rossisj@asme.org](mailto:rossisj@asme.org) and ANSI must be copied at [psa@ansi.org](mailto:psa@ansi.org). You should reference Record # 07-245 ASME Boiler & Pressure Vessel Code Section VIII Div1/Div 2 Public Comments.

Also attached are documents created by AHRI providing more details in case you are interested.

Please reach out if you have any questions or need any help with your comments.

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