

August 21, 2003

[REDACTED]  
U.S. Green Building Council  
1015 18th St. NW, Suite 805  
Washington, DC 20036

Subject: LEED 2.0 Energy Credit 4: Ozone Depletion

Dear [REDACTED],

Thank you for the reply regarding an opportunity to comment on the proposal to include HCFC-123 with the HFC refrigerants as qualifying for a LEED point under the ozone depletion section (Credit 4).

The intent of this section is clear ("Reduce ozone depletion and support early compliance with the Montreal Protocol"), to support the Montreal Protocol with regard to ozone depletion. The Protocol covers all HCFC compounds, including HCFC-123, and has specific phase-out dates, as does the U.S. Clean Air Act. York manufactures chiller products that use both HFC and HCFC refrigerants (including HCFC-123 centrifugal chillers), recognizing the benefits and limitations of the various compounds.

York is opposed to the inclusion of HCFC-123 for credit 4, Ozone Protection. Even though the ODP of HCFC-123 is low, it is still an HCFC, and the LEED program should not start making specific compound exemptions. Very similar arguments could be made that HCFC-22 should also be exempted, based on its very low ODP and excellent performance as a refrigerant.

HCFC-123 has a number of advantages and disadvantages, as do all the refrigerants. It should stand on these merits when evaluated for LEED applications, without the adoption of specific exemptions that it technically does not meet.

Sincerely,

William E. Dietrich  
Director of Applications  
Engineered Systems, York Americas