

# SIEMENS

<b>DOCKET</b>
<b>12-BSTD-1</b>
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**To:** California Energy Commission  
Docket No. 12-BSTD-1

**Date:** April 5, 2012

**From:** Jim Coogan

**Re:** Comment on Title 24 Revisions,  
Docket No. 12-BSTD-1

Please consider the following suggested addition to the 45-day language posted for Title 24, Part 6. The posted section 140.9(c) appears below, with a suggested sentence added in *blue italics*.

**(c) Prescriptive Requirements for Laboratory exhaust systems.**

For buildings with laboratory exhaust systems where the minimum circulation rate to comply with code or accreditation standards is 10 ACH or less, the design exhaust airflow shall be capable of reducing zone exhaust and makeup airflow rates to the regulated minimum circulation rate, or the minimum required to maintain pressurization requirements, whichever is larger. *Variable exhaust and makeup airflow shall be coordinated to achieve the required space pressurization at varied levels of demand and fan system capacity.*

**EXCEPTION 1 to Section 140.9(c):** Laboratory exhaust systems serving zones where constant volume is required by the Authority Having Jurisdiction, facility Environmental Health & Safety department or other applicable code.

**EXCEPTION 2 to Section 140.9(c):** New zones on an existing constant volume exhaust system.

This comment fundamentally supports the proposed language. From our perspective as a ventilation control system provider, we believe that variable ventilation is sufficiently commonplace that such a requirement is not onerous. Further, we believe that the stated Exception 1 gives safety professionals sufficient latitude to require fixed ventilation rates where warranted.

The comment is not an attempt add or remove requirements. Rather it is an attempt to call attention to the combination of variable flow requirement stated here and any space pressurization requirements that apply to the project. This combination requires particular attention from those who design, construct and operate a laboratory facility.

I submit this suggestion as an individual, not on behalf of any of the professional organizations in which I participate.