

## DOCKETED

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*Comment Received From: Hwakong Cheng*

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## **Automatic Fume Hood Sash Closures**

*Additional submitted attachment is included below.*



To: CEC  
From: Hwakong Cheng  
Subject: Comments on Prescriptive Requirements for Fume Hood Sash Closers  
Date: February 16, 2018

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We are supportive of the change to require automatic sash closure systems (Section 140.9(c)4) as fume hoods are a very high energy-intensity end use and other potential measures do not, in our opinion, provide the same level of energy savings and safety benefit. User education has the potential to reduce energy use associated with VAV fume hoods, but must be repeated regularly to ensure the persistence of savings.

The wording of section 140.9(c)4 is awkward because the subject of the sentence is "laboratories" but really should be "fume hoods". Sashes and automatic sash closure systems are components of fume hoods, not of the laboratory rooms. Also, we recommend clarifying the requirement to apply to hoods that only have vertical sashes to make clear that it does not apply to hoods with combination sashes. Consider revising the paragraph as follows for clarity:

**“4. Fume Hood Automatic Sash Closure.** Variable air volume laboratory fume hoods that have vertical-only sashes and that are located in fume hood intensive laboratories, as described in Table 140.9-B, ~~with variable air volume laboratory fume hoods, and with vertical sashes~~ shall have an automatic sash closure system that complies with the following:”