

**WHITE PAPER**  
**Proposed Ventilation and Energy Efficiency**  
**Verification/Repair Program for School Reopening**

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This paper presents a proposal for a Ventilation and Energy Efficiency Verification/Repair Program that would prepare schools for reopening during the COVID-19 crisis. This program includes certifying school facilities as having functioning air ventilation and filtration systems that meet or exceed OSHA and California Energy Commission requirements, and, to the extent feasible, that meet ventilation and filtration recommendations for reopening schools set forth by the World Health Organization (WHO), the Centers for Disease Control and Prevention (CDC), and the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), as well as any applicable local and state agency school reopening guidance. Providing adequate ventilation and filtration, however, can significantly increase energy demand if not done correctly or where a system is already inefficient or poorly maintained. The program would also ensure that systems are operating energy efficiently and will identify recommendations for efficiency and safety upgrades.

This program would require recipients to (1) assess, maintain, adjust, and, if necessary, repair existing heating, ventilation and air conditioning (HVAC) systems to verify proper and efficient operation, as well as compliance with health and safety standards; (2) install carbon dioxide (CO<sub>2</sub>) sensors in classrooms to verify that proper ventilation is maintained throughout the school year; and (3) prepare an HVAC Assessment Report documenting the work performed and identifying any additional system balancing, upgrades, replacements or other measures recommended to improve the health, safety, and/or efficiency of the HVAC system. School Facilities that comply with these requirements would be provided a COVID-19 Reopening Ventilation Verification Certificate for posting in the building.

Research has shown that underventilation of classrooms is common and negatively impacts student health and learning. A 2003 report to the Legislature by the California Air Resources Board and the State Department of Health Services found significant indoor air quality problems in California schools, including problems with ventilation, temperature and humidity, air pollutants, floor dust contaminants, moisture, mold, noise, and lighting. The report found that ventilation with outdoor air was inadequate during 40% of classroom hours and seriously

deficient during 10% of classroom hours, in both portable classrooms and traditional classrooms.<sup>1</sup>

The California Building Energy Efficiency Standards has set minimum ventilation rates for classrooms.<sup>2</sup> The California Education Code requires school districts to maintain schools in good repair, including HVAC systems that are functional, supply adequate ventilation to classrooms, and maintain interior temperatures within acceptable ranges.<sup>3</sup> Despite these requirements, poor performing HVAC systems and underventilation of classrooms continues to be a persistent problem in California.

A 2020 report by the University of California-Davis Western Cooling Efficiency Center and the Indoor Environment Group of Lawrence Berkeley National Laboratory found over half of new HVAC systems in schools had significant problems within three years of installation, and that the vast majority of classrooms in California continue to fail to meet minimum ventilation rates.<sup>4</sup> Nearly 20% of classrooms had average daily maximum CO<sub>2</sub> concentrations above 2,000 ppm, where an adequately ventilated classroom should not exceed a concentration of 1,100 ppm. The researchers recommended periodic testing of HVAC systems and continuous real-time CO<sub>2</sub> monitoring to detect and correct these problems.

The persistence of underperforming HVAC systems and inadequate ventilation rates in the classroom is of particular concern as California looks to reopen schools during the COVID-19 pandemic. An April 2020 paper by ASHRAE found that viruses such as COVID-19 can spread through the air in two ways. Larger droplets travel between 6 and 7 feet before dropping to the ground, but smaller droplets can evaporate and become aerosolized, remaining airborne for extended periods.<sup>5</sup> SARS-CoV-2 virus has been found within aerosols for 3 hours in one study<sup>6</sup> and viable up to 16 hours in another study<sup>7</sup>. Additionally, 239 scientists have signed an open letter urging the WHO to recognize and mitigate the potential for airborne spread of COVID-19.<sup>8</sup> Increasing filtration levels and ventilation rates removes and dilutes these aerosolized viruses, reducing the

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<sup>1</sup> Whitmore, et al., California Portable Classrooms Study, Phase II: Main Study, Final Report, Volume II., Report to the California Air Resources Board and California Department of Health Services (2003) at pp. xxii & xxiii ([https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/00-317\\_v2.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/00-317_v2.pdf)).

<sup>2</sup> See Cal. Code Regs, tit. 24, Part 6, Section 120.1 and Table 120.1-A (Minimum Ventilation Rates).

<sup>3</sup> Cal. Education Code §§ 17070.75 & 17002.

<sup>4</sup> Chan, et al, Ventilation rates in California classrooms: Why many recent HVAC retrofits are not delivering sufficient ventilation, *Building and Environment Journal* 167 (2020) (<https://www.sciencedirect.com/science/article/pii/S0360132319306365>).

<sup>5</sup> ASHRAE, ASHRAE Position Document on Infectious Aerosols. ASHRAE (April 2020), ([https://www.ashrae.org/file%20library/about/position%20documents/pd\\_infectiousaerosols\\_2020.pdf](https://www.ashrae.org/file%20library/about/position%20documents/pd_infectiousaerosols_2020.pdf))

<sup>6</sup> Van Doremalen N, Bushmaker T, Morris DH, Holbrook MG, Gamble A, Williamson BN, et al. Aerosol and surface stability of SARS-Cov-2 as compared with SARS-Cov-1. *N Engl J Med.* 2020;382:1564-7. <https://www.nejm.org/doi/full/10.1056/nejmc2004973>.

<sup>7</sup> Fears, A. C., Klimstra, W. B., Duprex, P., Hartman, A., Weaver, S. C., Plante, K. S...Roy, C. J. (June 22, 2020). Persistence of Severe Acute Respiratory Syndrome Coronavirus 2 in Aerosol Suspensions. *Emerging Infectious Diseases*, 26(9), 2168-2171. <https://dx.doi.org/10.3201/eid2609.201806>

<sup>8</sup> Lidia Morawska, Donald K Milton, It is Time to Address Airborne Transmission of COVID-19, *Clinical Infectious Diseases*, , ciaa939, <https://doi.org/10.1093/cid/ciaa939>

risk of infection for occupants. For that reason, WHO<sup>9</sup>, the CDC<sup>10</sup> and ASHRAE<sup>11</sup> recommend ensuring ventilation systems operate properly, increasing ventilation rates, and installing filters with a minimum efficiency rating value (MERV) of 13 or better where possible in order to reduce the spread of COVID-19. A May 2020 report by Dr. Jovan Pantelic at U.C. Berkeley further recommends continuous CO<sub>2</sub> monitoring and maintaining relative humidity in the range of 40%-60%.<sup>12</sup>

These steps can however increase energy consumption, particularly in systems that are already inefficient due to age, deferred maintenance or improper installation. Studies have shown that the efficiency of an HVAC system is highly dependent on the quality of its installation. Poor quality installation of HVAC systems results in a 20% to 30% increase in energy use.<sup>13</sup> Moreover, poor quality installation is pervasive. A study by the California Energy Commission found that over 50% of new HVAC systems and 85% of replacement HVAC systems that they evaluated were not performing correctly due to poor quality installation.<sup>8</sup> Utility-funded studies have found the vast majority of HVAC installers don't have the technical training, knowledge, skills, or abilities to properly install systems, resulting in high failure rates for job performance on even routine tasks.<sup>14</sup>

The program would prepare schools to reopen with functional ventilation systems that are verified as having been tested, adjusted, and if necessary repaired or replaced, by qualified personnel in order to provide recommended ventilation rates as reliably and energy efficiently as possible. Ventilation rates will be documented in an HVAC assessment report submitted to the program administrator and available to the public upon request.

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<sup>9</sup> World Health Organization, Considerations for school-related public health measures in the context of COVID-19 (May 10, 2020) (<https://www.who.int/publications-detail/considerations-for-school-related-public-health-measures-in-the-context-of-covid-19>); World Health Organization, Considerations for public health and social measures in the workplace in the context of COVID-19 ( May 10, 2020) (<https://www.who.int/publications-detail/considerations-for-public-health-and-social-measures-in-the-workplace-in-the-context-of-covid-19>); World Health Organization, Q&A: Ventilation and air conditioning in public spaces and buildings and COVID-19 ( July 29, 2020) <https://www.who.int/news-room/q-a-detail/q-a-ventilation-and-air-conditioning-in-public-spaces-and-buildings-and-covid-19>

<sup>10</sup> Centers For Disease Control and Prevention, Operating schools during COVID-19: CDC's Considerations (August 21, 2020) <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html>; Centers For Disease Control and Prevention, Interim Guidance For Businesses and Employers Responding To Coronavirus Disease 2019 (COVID-19) (May 6, 2020) (<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>)

<sup>11</sup> ASHRAE, ASHRAE Epidemic Task Force: Building Readiness (updated August 19, 2020) (<https://www.ashrae.org/file%20library/technical%20resources/covid-19/ashrae-building-readiness.pdf>) ASHRAE, ASHRAE Epidemic Task Force: Schools & Universities (updated July 17, 2020) (<https://www.ashrae.org/file%20library/technical%20resources/covid-19/ashrae-reopening-schools-and-universities-c19-guidance.pdf>);

<sup>12</sup> Pantelic, Using IoT Environmental Sensing to Reopen Spaces, SenseWare (May 2020) (<https://cdn2.hubspot.net/hubfs/5238584/White%20Paper%20Senseware%20Covid.pdf>).

<sup>13</sup> California Energy Commission, *Strategic Plan to Reduce the Energy Impact of Air Conditioners* (June 2008), CEC-400-2008-010, at p. (v) (<http://www.energy.ca.gov/2008publications/CEC-400-2008-010/CEC-400-2008-010.PDF>); see also Zabin, et. al, *Workforce Issues and Energy Efficiency Programs: A Plan for California's Utilities*, Don Vial Center for Employment in the Green Economy (2014), at pp. 32-34 and Appendix 2B (<http://laborcenter.berkeley.edu/workforce-issues-and-energy-efficiency-programs-a-plan-for-californias-utilities/>).

<sup>14</sup> SCE Energy Efficiency Business Plan 2018-2025 at p. 63; SDG&E Energy Efficiency Business Plan 2018-2025 at p. 216; PG&E Energy Efficiency Business Plan (2018-2025), Residential Appendix at p. 30; see also C. Zabin, et. al, *Workforce Issues and Energy Efficiency Programs: A Plan for California's Utilities*, Don Vial Center for Employment in the Green Economy (2014), at p. 34 (<http://laborcenter.berkeley.edu/workforce-issues-and-energy-efficiency-programs-a-plan-for-californias-utilities/>).

Improving the performance of school HVAC systems not only saves energy and provides a safer and healthier building environment, it also has a significant correlation to student performance. In a 2017 literature review, W. J. Fisk summarized that 8 studies reported statistically significant improvements in some measures of student performance associated with increased ventilation rates or lower CO<sub>2</sub> concentrations, with performance increases up to 15%.<sup>15</sup>

A 2018 report in the *Environment International Journal* found that short-term CO<sub>2</sub> exposure beginning at 1000 ppm affects cognitive performance, including decision making and problem resolution.<sup>16</sup> The Wisconsin Department of Health states that CO<sub>2</sub> levels between 1000 and 2000 ppm are associated with drowsiness and attention issues. CO<sub>2</sub> levels above 2000 ppm affect concentration and can cause headaches, increased heart rate, and nausea.<sup>17</sup>

This program will thus also provide the additional benefit of addressing the numerous studies finding that the widespread underventilation of classrooms in California is negatively impacting student health and learning.

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<sup>15</sup> Fisk, W. J., The ventilation problem in schools: literature review, *Indoor Air*. 2017;27:1039–1051 (<https://onlinelibrary.wiley.com/doi/epdf/10.1111/ina.12403>)

<sup>16</sup> Azuma, et al, Effects of low-level inhalation exposure to carbon dioxide in indoor environments: A short review on human health and psychomotor performance, *Environment International* 121 (2018) (<https://www.sciencedirect.com/science/article/pii/S0160412018312807>).

<sup>17</sup> Wisconsin Department of Health Services, Carbon Dioxide (Dec. 20, 2019) (<https://www.dhs.wisconsin.gov/chemical/carbondioxide.htm>).

## **PROPOSED REQUIREMENTS:**

**School Ventilation and Efficiency Verification and Repair Program.** The Office of Public School Construction or other appropriate state agency shall create and administer a School Ventilation and Efficiency Verification and Repair Program that shall allocate grants to Local Educational Agencies (LEAs) to prepare schools to reopen with functional ventilation systems that are tested, adjusted, and if necessary repaired, by qualified personnel in order to provide recommended ventilation rates as reliably and energy efficiently as possible. Recipients shall: (1) assess, maintain, adjust, and, if necessary, repair existing HVAC systems to ensure ventilation rates meet or exceed the standards set forth in Table 120.1-A of the 2019 Title 24 California Building Energy Efficiency Standards; (2) provide MERV 13 filtration or better where feasible, or the maximum MERV filtration that the system design can handle; (3) install CO<sub>2</sub> sensors in classrooms to verify that proper ventilation is maintained throughout the school year; and (4) prepare an HVAC Assessment Report documenting the work performed and identifying any additional system balancing, upgrades, replacements or other measures recommended to improve the health, safety, and/or efficiency of the HVAC system. School Facilities that comply with these requirements shall be provided a COVID-19 Reopening Ventilation Verification Certificate for posting in the building.

An LEA that accepts a grant under this Program for verification of a school facility shall perform the following tasks for all air handling units, roof top units and unitary and single zone equipment in that facility's HVAC system or systems:

### **Assessment, Maintenance, Adjustment and Repair of Existing Facility Ventilation System.**

**1. Filtration.** Consistent with the recommendations of the ASHRAE Guidance for Reopening Schools and Universities, MERV 13 or better filtration shall be installed in the facility's HVAC system where feasible. Qualified Testing Personnel shall review system capacity and airflow to determine the highest Minimum Efficiency Reporting Value (MERV) filtration that can be installed without adversely impacting equipment, shall replace or upgrade filters where needed, and shall verify that such filters are installed correctly. Where a system uses Ultraviolet Germicidal Irradiation (UVGI) to disinfect the air, the UVGI lamp shall be checked for proper operation, replacing bulbs as needed and verifying that the ultraviolet light does not shine on filters. Recommendations for additional maintenance, frequency of filter replacement, replacement or upgrades to allow for more protective filtration shall be recorded in the HVAC Assessment Report.

**2. Ventilation and Exhaust.** Following the assessment of the filtration, Qualified Testing Personnel shall assess the ventilation rates in the facility classrooms, auditoriums, gymnasiums, nurses offices, restrooms and other occupied areas to determine whether they meet the minimum ventilation rate requirements set forth in Table 120.1-A of the 2019 Title 24 California Building Energy Efficiency Standards. Assessment shall include:

- (i). Calculation of the required minimum outside air ventilation rates for each occupied area based on the anticipated occupancy and the minimum required ventilation rate per occupant set forth in Table 120.1-A of the 2019 Title 24 California Building

Energy Efficiency Standards. Calculations shall be based on maximum anticipated classroom or other occupied area occupancy rates and determined by the performing technician. Natural Ventilation shall be designed in accordance with Section 402.2 of the 2019 California Mechanical Code and shall include mechanical ventilation systems designed in accordance with Section 403.0, Section 404.0, or both. Additionally, any room relying on Natural Ventilation shall have a continuously operational CO<sub>2</sub> monitor as prescribed in section 7a of this document.<sup>18</sup>

(ii). Measurement of Outside Air per Section B of NRCA-MCH-02-A – Outdoor Air Acceptance and verification of whether the system provides the minimum outside air ventilation rates calculated in subsection (i).

(iii). Verification of coil velocities and unit discharge air temperatures required to maintain desired indoor conditions and to avoid moisture carry over from cooling coils.

(iv). Verification that separation between outdoor air intakes and exhaust discharge outlets meet code requirements.

(v). Confirmation that the air handling unit is bringing in outdoor air and removing exhaust air as intended by the system design.

(vi) Measurement of all exhaust air volume for exhaust fans, including restrooms. Document any discrepancies from system design. Per ASHRAE Guidance for Reopening and Operating Schools exhaust fans operate whenever HVAC systems are in operation.

(vii) Energy Recovery Ventilation (ERV) system operation and leakage concerns should be addressed according to the recommendations of the ASHRAE Building Readiness document.

**3. Economizer.** For systems with economizers, Qualified Testing Personnel shall test system economizer dampers per Section B of NRCA-MCH-05-A – Air Economizer Controls and repair any economizer dampers and controls that are not properly functioning shall be recorded in the HVAC Assessment Report. Recommendations for additional maintenance, replacement or upgrades shall be recorded in the HVAC Assessment Report.

**4. Demand Control Ventilation.** If installed, demand control ventilation shall be adjusted to a CO<sub>2</sub> set point of 800 ppm or less and tested by per Section B of NRCA-MCH-06-A – Demand Control Ventilation Systems Acceptance<sup>19</sup>. If the demand control ventilation system does not maintain average daily maximum CO<sub>2</sub> levels below 1,100 ppm, it shall be disabled until such time as the LEA determines that the COVID-19 crisis has passed, unless disabling the control would adversely affect operation of the overall system. When disabling a demand control ventilation system, the system must be configured to meet the minimum ventilation rate

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<sup>18</sup> California Building Standards Commission. (2019). *California mechanical code*. Sacramento, CA.

<sup>19</sup> The CO<sub>2</sub> set point of 800 ppm is recommended by the UC Davis Western Cooling Efficiency Center. The purpose of the 800 ppm set point for demand control ventilation systems is to prevent the automated control system from overshooting a maximum 1,100 ppm CO<sub>2</sub> concentration.

requirements and tested and adjusted in accordance with section 3. Recommendations for additional maintenance, replacement or upgrades shall be recorded in the HVAC Assessment Report.

## **5. Air Distribution and Building Pressurization**

(i). Survey readings of inlets and outlets to verify all ventilation is reaching the served zone and that there is adequate distribution. Verify if inlets and outlets are balanced within tolerance of the system design. Document read values and deficiencies. If the original system design values are not available, document available information and note unavailability of system design values in the HVAC Assessment Report.

(ii). Verification of building and space pressure to ensure:

- Building pressure is positive relative to the outdoors.
- Pressure differential is within tolerance of design.
- Building is not over pressurized.
- Contaminant rooms to be temporarily occupied by sick students or staff, maintain a negative pressure, as designed.

**6. General Maintenance.** Qualified Testing Personnel or a Skilled and Trained Workforce shall verify coil condition, condensate drainage, cooling coil air temperature differential (entering and leaving dry bulb), heat exchanger air temperature differential (entering and leaving dry bulb), and drive assembly. Recommendations for additional maintenance, replacement or upgrades shall be recorded in the HVAC Assessment Report.

**7. Operational Controls.** Qualified Testing Personnel shall review control sequences to verify systems will maintain intended ventilation, temperature and humidity conditions during school operation. Previously unoccupied buildings shall perform the recommended practices of reopening a building as covered in the ASHRAE Building Readiness document. Verify a daily flush is scheduled for 2 hours before and after scheduled occupancy or demonstrate calculation of flush times per ASHRAE Guidance for Reopening and Operating Schools and Buildings or otherwise applicable local or state guidance. Verify that HVAC system operational times, exhaust fans operation times, setpoints, and enabled features meet ASHRAE Guidance for Reopening and Operating Schools and Buildings or otherwise applicable local or state guidance.

**8. CO<sub>2</sub> Monitoring.** To ensure proper ventilation is maintained throughout the school year, all classrooms shall be equipped with a CO<sub>2</sub> monitor that:

(1) Is hard-wired or plugged-in and mounted to the wall between 3 – 6 feet above the floor and at least 5 feet away from the door and operable windows.

(2) Displays the CO<sub>2</sub> readings to the teacher through a display on the device or other means such as a web-based application or cell-phone application.

(3) Notifies the teacher through visual indicator on the monitor (e.g. indicator light) or other alert such as e-mail, text, or cell phone application, when the CO<sub>2</sub> levels in the classroom have exceeded 1,100 ppm.

(4) Maintains a record of previous data which includes at least the maximum CO<sub>2</sub> concentration measured.

(5) Has a range of 400 - 2000 ppm or greater;

(6) Is certified by the manufacturer to be accurate within 75 ppm at 1,000 ppm CO<sub>2</sub> concentration and is certified by the manufacturer to require calibration no more frequently than once every five years.

If a classroom CO<sub>2</sub> concentration exceeds 1,100 ppm more than once a week as observed by the teacher or the facilities staff, the classroom ventilation rates shall be adjusted by Qualified Adjusting Personnel to ensure peak CO<sub>2</sub> concentrations in the classroom remain below the maximum allowable CO<sub>2</sub> PPM setpoint. Verification of the installation of CO<sub>2</sub> Monitors in all classrooms shall be included in the HVAC Assessment Report.

**9. HVAC Assessment Report.** Qualified Testing Personnel shall prepare an HVAC Assessment Report for each school facility. The HVAC Assessment Report shall include the following information:

- (1) Name and address of school facility and person/contractor preparing and certifying Report.
- (2) Description of assessment, maintenance, adjustment and repair activities and outcomes.
- (3) Document HVAC equipment model number, serial number, general condition of unit, and any additional information that could be used to assess replacement and repair options given potential for increased energy efficiency benefits.
- (4) Verification that all requirements of the program have been satisfied.
- (5) Either verification that MERV 13 filters have been installed or verification that the maximum MERV-rated filter that the system is able to effectively handle has been installed and what that MERV-rating is.
- (6) The verified ventilation rates for facility classrooms, auditoriums, gymnasiums, nurses' offices, restrooms, offices and other occupied areas and whether those rates meet the requirements set forth in the 2019 Title 24 California Building Energy Efficiency Standards. If ventilation rates do not meet applicable guidance, then an explanation for why the current system is unable to meet those rates should be provided.
- (7) The verified exhaust for facility classrooms, auditoriums, gymnasiums, nurses' offices', restrooms and other occupied areas and whether those rates meet the requirements set forth in the design intent.



- (8) Clearly define system deficiencies and provide recommendations for additional maintenance, replacement or upgrades, such as upgrading systems to allow for additional ventilation and filtration and/or to improve energy efficiency.  
Deficiencies to include:
- i. Discrepancies between supply, return, exhaust, and outside air summations which signal duct leakage.
  - ii. Discrepancies between designed total airflow and actual airflow which signal leakage, excessive resistance, or faulty operation.
  - iii. Low cooling coil air temperature differential (entering and leaving dry bulb), in comparison to design, which signal improper refrigerant charge.
- (9) Reports shall clearly document initial operating verifications, adjustments, and final operating verifications and document any adjustments or repairs performed.
- (10) Verification of installation of CO<sub>2</sub> Monitors, including make and model of monitors.

(11) Verification that all work has been performed by qualified personnel, including the provision of the contractor's name and license, acceptance test technician name and certification number (where applicable), TAB technician name and certification number (where applicable) and verification that all construction work has been performed by a skilled and trained workforce.

The LEA shall maintain a copy of the HVAC Assessment Report and make it available to any member of the public upon request.

**10. Licensed Professional Review.** A licensed professional shall review the assessment report and determine what, if any, additional adjustments or repairs would be necessary to meet the minimum ventilation and filtration requirements, determine whether any cost-effective energy efficiency upgrades or replacements are warranted or recommended, and provide an estimated cost for this work.

Factors to determine HVAC replacements and upgrades:

- Consider the general condition of the unit and the cost to repair the unit versus cost to replace. Consider equipment service life and maintenance costs with the ASHRAE Service Life and Maintenance Cost Database.<sup>20</sup> Replacement costs should consider potential energy savings.
- Consider energy usage over life of unit by a comparison of the unit's Seasonal Energy Efficiency Ratio (SEER) to that of potential replacement options.<sup>21</sup>
- Improper airflow and temperature differentials determined in the assessment should be diagnosed as they signal reduced energy efficiency.<sup>22</sup>

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<sup>20</sup> "ASHRAE: Service Life and Maintenance Cost Database." *ASHRAE*, <http://xp20.ashrae.org/publicdatabase>

<sup>21</sup> 2017 Standard for Performance Rating of Unitary Air-Conditioning & Air-Source Heat Pump Equipment. AHRI, 2017.

<sup>22</sup> Kim, Woohyun and Braun, James E., "Impacts of Refrigerant Charge on Air Conditioner and Heat Pump Performance" (2010). International Refrigeration and Air Conditioning Conference. Paper 1122. <http://docs.lib.purdue.edu/iracc/1122>

- Units containing R-22 refrigerant or has a history of refrigerant leaks to be considered for replacement.
- Units with manual thermostats shall be upgraded to programmable thermostats.
- Units without a functional economizer to be considered for repair or economizer upgrade.
- Units with indoor fan motors not meeting the NEMA Premium Efficiency Electric Motor standard should be considered for a replacement with a NEMA Premium Efficiency Electric Motor.
- Units with a Fixed Orifice (FXO) to be considered for replacement with a unit with a Thermostatic Expansion Valve (TXV).

**11. Repairs and Adjustment.** If the system does not meet the minimum ventilation rate requirements set forth in Table 120.1-A of the 2019 Title 24 California Building Energy Efficiency Standards, Qualified Testing Personnel shall review the system airflow and capacity to determine if additional ventilation can be provided without adversely impacting equipment performance and building Indoor Environmental Quality (IEQ). If additional ventilation can be provided, qualified personnel shall adjust ventilation rates to meet the minimum ventilation rate requirements set forth in the 2019 Title 24 California Building Energy Efficiency Standards to the extent feasible. After adjustment, re-test and document outside air readings, proper unit operation, and building/room pressures.

If minimum ventilation rate requirements set forth in Table 120.1-A of the 2019 Title 24 California Building Energy Efficiency Standards cannot be met with adjustment, the system shall be repaired, upgraded or replaced as necessary to meet these requirements. Such repairs, upgrades or replacements shall be considered a critical repair and shall be eligible for additional funding under this Program. Priority recommendations for additional HVAC system maintenance, replacement or upgrades to improve ventilation outcomes or ventilation efficiency shall be completed.

If installed HVAC systems or system components are broken, fail to meet minimum ventilation requirements, or are unable to operate to the original design and intent, corrective work must be completed prior to resumption of school operation.

All repairs or installation of upgrades or replacements shall be performed by a Skilled and Trained Workforce.

**12. COVID-19 Reopening Ventilation Verification Certificate.** Upon receipt of a copy of the HVAC Assessment Report, the Licensed Professional shall provide the LEA a COVID-19 Reopening Ventilation Verification Certificate for posting in the verified school building that states that the school meets the minimum 2019 Title 24 California Energy Commission requirements for ventilation.

### **Qualified Personnel Definitions**

**Certified Testing, Adjusting and Balancing (TAB) Technician.** A technician certified to perform testing, adjusting and balancing of HVAC systems by the Associated Air Balance Council (AABC), the National Environmental Balancing Bureau (NEBB), or the Testing, Adjusting and Balancing Bureau (TABB).

**Qualified Adjusting Personnel.** Qualified Adjusting Personnel shall either be: (1) a Certified TAB technician; or (2) a skilled and trained workforce under the supervision of a certified TAB Technician.

**Qualified Testing Personnel.** Qualified Testing Personnel shall either be: (1) an HVAC acceptance test technician certified by an Acceptance Test Technician Certification Provider (ATTCP) that is approved by the Energy Commission to provide such certification; or (2) a certified TAB technician.

**Skilled and Trained Workforce.** A skilled and trained workforce is a workforce that meets the definition requirements set forth in California Public Contract Code section 2601

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