



11 Robert Toner Blvd., # 234 | North Attleboro, MA 02763 | Phone: 508-839-3407 | www.acane.org

January 30, 2020

The Honorable Aaron Michlewitz
Chairman, House Ways and Means
Room 243
State House
Boston, MA 02133

H.4306 - An Act relative to refrigeration technicians

Dear Chairman Michlewitz,

I am writing on behalf of the Air Conditioning Association of New England (ACA/NE), a not-for-profit trade association for residential heating, ventilating, air conditioning and refrigeration contractors. ACA/NE represents and serves companies that design, install, service and repair air conditioning, heating, refrigeration, air purification, ventilating systems, plumbing, piping, sheet metal and energy management systems of all sizes and complexities. In addition, membership includes manufacturers of equipment, wholesalers and distributors of equipment, vocational and technical schools, and others with an interest in the residential HVAC/R industry.

ACA/NE members are opposed to the passage of H.4306 - An Act relative to refrigeration technicians. This legislation would require residential HVAC contractors to obtain a refrigeration license for work under ten tons.

ACA/NE is not opposed to licensing residential HVAC contractors. In fact, we recently submitted a proposal to the Massachusetts Board of Building Regulations and Standards (BBRS) to create a HVAC Construction Supervisors License (CSL).

The scope of work covered under the new license would include the construction, reconstruction, installation, maintenance, repair or removal of heating, ventilation and air conditioning systems of less than ten-ton capacity. The new license would be subject to all of the obligations currently imposed on other construction supervisors.

We anticipate that the new HVAC CSL will result in a simplified and uniform HVAC permit. The certification, testing, continuing education and licensing guideline will be developed by the BBRS with assistance and input from the relevant parties, including city and town building inspectors.

It makes sense to develop an HVAC CSL through the BBRS because ninety percent (90%) of the work that residential contractors do is defined in the International Energy Conservation (IEC) and International Residential Codes (IRC) already under the authority of the BBRS. Additionally, the mission of the BBRS is SAFETY and Health of the people and building.

With that said, it does not make sense to require that residential HVAC contractors obtain a commercial refrigeration license for work under ten tons. The new license will be duplicative and place residential HVAC contractors within an oversight agency that does not inspect or supervise their work as professional building inspectors do currently.

Specific Training Requirements will include:

Industry Code

- Residential Code
- International Energy Code

General Business Safety

- Asbestos Awareness
- Burns and Cuts
- Business Practices for Small Contractors
- Carbon Monoxide Safety
- Combustion Analyzing
- Cylinder Handling
- Dangers of Electrical Hazards
- Distracted Driving, Driving Safely
- Eye Protection and Eye Washing
- Fan Safety
- Fire Prevention, Protection and Emergency Egress Safety
- Fire Safety
- First Aid
- Fixed and Portable Ladder Safety
- HotWorks
- Job Site Safety
- Ladders and Falls
- Lead Safe Practices
- Material Handling
- Mold, Respiratory Masks,
- Osha 10
- Personal Protective Equipment
- Safety Clothing
- Slip, Trip and Fall Hazard Protection
- Tag Out/Lock Out

- Walking on Icy Surfaces
- Working in Confined Spaced, Working in Hot Attics Safety
- Soldering, Brazing and Welding
- Workplace Safety

HVAC Technical Certification

- ACCA Manual J
- ACCA Manual D
- ACCA Manual S
- Air Conditioning
- Air Distribution
- Airflow Basics
- Basic HVAC Equipment Types
- Electrical Components
- Electrical Measurement
- Filtration
- Gas Furnaces
- Heat Pumps
- HVAC Refrigeration Components and Hand Tools
- Hydronic System Basics
- Hydronics Gas
- Hydronics Oil
- Maintenance Inspection Basics
- North American Technician Excellence (NATE) Official HVAC Certification
- Oil Furnaces
- Room Temperature Differences
- System Installation Basic

The majority of residential and small commercial systems are limited to five tons. Ten-ton systems and above are very different than systems encountered in residential work, requiring different skill sets, different safety requirements and different knowledge. Commercial HVAC work also encompasses different refrigerants, different voltages and different Codes. Also, the questions on the current test by and large, do not apply to residential work.

Thank you for your attention to our concerns.

Sincerely,

Manuel Chaves

Manuel Chaves
manny@chaveshvac.com
ACA/NE Government Affairs Chairman
Chaves Heating and AC, Inc.
15 Bonazzoli Ave.
Hudson, MA 01749
Phone: (978) 562-5309

Catherine A. Flaherty

Catherine Flaherty, CAE
cflaherty@acane.org
ACA|NE Executive Director
11 Robert Toner Blvd., # 234
North Attleboro, MA 02763
Phone: 508-839-3407