



CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

Information Bulletin 25-001

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A2L Refrigerants in Ambulatory Care Facilities

The 2022 California Codes have been revised to eliminate the Group I-2.1 occupancy classification for ambulatory care and outpatient medical care facilities. Those facilities have been reclassified as Group B. The CAL FIRE Office of the State Fire Marshal (OSFM) is providing this Information Bulletin to provide guidance for the application of provisions for A2L refrigerants used in heating, ventilation and air conditioning equipment in ambulatory care facilities now classified as Group B.

Occupancy Reclassification

In the 2022 Intervening Code Adoption Cycle, OSFM submitted revisions to reclassify ambulatory care facilities from Group I-2.1 to Group B. This action was taken to provide consistency with NFPA 101, *Life Safety Code*. Licensed ambulatory health care facilities that receive reimbursement for Medicare and Medicaid services are required to comply with the provisions of NFPA 101, *Life Safety Code*, Chapter 20. Deletion of Group I-2.1 and regulation of these facilities as Group B ambulatory care facilities is consistent with NFPA 101.

Several sections throughout the California Codes were revised to correlate with this new occupancy classification. However, one provision was missed in the 2022 California Mechanical Code. Table 1104.1 in the CMC was revised to include the Group A2L refrigerants but was not revised to remove the reference to Group I-2.1. The OSFM is providing this Information Bulletin to identify this editorial change and clarify the application of CMC Table 1104.1.

Ambulatory Care Facilities are Classified as Group B

CBC Section 304.1 has been revised to list ambulatory care facilities serving four or more patients as Group B, and the reference to Group I-2.1 has been removed from Section 308.3. Ambulatory care facilities are classified as Group B and the row in the table for Group I-2.1 should be ignored. It is no longer applicable since ambulatory care facilities are now classified as Group B.

Group B occupancies are listed in the table and the allowable refrigerants for high-probability systems are Group A1 or Group A2L.

The US EPA regulations went into effect on January 1, 2025 which require refrigerants with a low global warming potential (GWP). Group A2L refrigerants have been developed to meet this EPA mandate. Since the 2025 California Codes will be out shortly, an errata will not be provided for this item. Revisions have been made for the 2025 California Mechanical Code and the row for Group I-2.1 has been removed.



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2022 California Mechanical Code Table 1104.1

Table 1104.1 of the CMC is shown below. The row for Group I-2.1 should be stricken since it no longer applies. Ambulatory care facilities are Group B.

**TABLE 1104.1
PERMISSIBLE REFRIGERATION SYSTEMS¹**

OCCUPANCY GROUP ³	HIGH-PROBABILITY SYSTEM	LOW PROBABILITY SYSTEM	MACHINERY ROOM
A-1	Group A1 or A2L ⁴ only	Any	Any
A-2	Group A1 or A2L ⁴ only	Any	Any
A-3	Group A1 or A2L ⁴ only	Any	Any
A-4	Group A1 or A2L ⁴ only	Any	Any
B	Group A1 ² or A2L ^{2,4} only	Any	Any
E	Group A1 or A2L ⁴ only	Any	Any
F-1	Group A1 ² or A2L ^{2,4} only	Any	Any
F-2	Any ²	Any	Any
H-1	Any	Any	Any
H-2	Any	Any	Any
H-3	Any	Any	Any
H-4	Group A1 or A2L ⁴ only	Any	Any
H-5	Group A1 or A2L ⁴ only	Any	Any
I-1	None	Any	Any
I-2	Group A1 or A2L ⁴ only	Any	Any
I-2.1	Group A1 only	Any	Any
I-3	None	Any	Any
I-4	Group A1 or A2L ⁴ only	Any	Any
M	Group A1 ² or A2L ^{2,4} only	Any	Any
R-1	Group A1 or A2L ⁴ only	Any	Any
R-2	Group A1 or A2L ⁴ only	Any	Any
R-3	Group A1 or A2L ⁴ only	Any	Any
R-4	Group A1 or A2L ⁴ only	Any	Any
S-1	Group A1 or A2L ⁴ only	Any	Any
S-2	Any ²	Any	Any
U	Any	Any	Any

Notes:

1. See Section 1104.0.
2. A refrigerant shall be permitted to be used within a high-probability system where the room or space is in accordance with Section 1104.4.
3. Occupancy classifications are defined in the building code.
4. See Section 1104.6 for requirements applicable to A2L equipment.