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To: DES SBCC <sbcc@des.wa.gov>

Subject: Testimony on the adoption of the 2018 WSEC-Commercial - EM099/C403.9.8.2 error/omission

I believe that my Code change proposal EM-099 ([attached](#)) has an error/omission. The new section C403.9.8.2 Exhaust heat recovery should have an exception for hazardous and other exhaust systems where it presents a safety issue to add heat recovery.

Here is my proposed revision:

C403.9.8.2 Exhaust heat recovery. Heat shall be recovered by the condenser heat recovery system from 90% of the total building exhaust airflow. The maximum leaving air temperature of exhaust air after heat recovery shall be 55F DB when operating at full capacity.

Exceptions:

1. Where energy recovery systems are restricted by Section 514 of the International Mechanical Code to sensible energy, those systems shall not be included in the calculation of total building exhaust airflow.

2. Exhaust air systems handling contaminated airstreams that are regulated by applicable codes or accreditation standards and pose a health risk to maintenance personnel to maintain heat recovery devices, those systems shall not be included in the calculation of total building exhaust airflow.

Thank you,

Robby Oylear