



***Construction Code Interpretation***  
***2021-SMC***

**CCI 2021-SMC §1109.2.5**

Shaft Alternative,  
ASHRAE 15-24, addendum a  
Release date: August 4, 2025  
Page 1 of 1

The following interpretation is intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this interpretation to specific projects may vary.

**Code Issue:**

Will SDCI accept use of the “shaft alternative” method in section in ASHRAE 15-2024, addendum a in lieu of enclosing refrigerant piping in a fire-resistance rated shaft enclosure required in section 1109.2.5 of Washington State Emergency Rule WSR 25-13-051 (extended by WSR 25-13-059). The rule applies to new stationary refrigeration and air conditioning equipment and systems installed in buildings and structures

**Code Interpretation:**

Yes, SDCI will accept use of the “shaft alternative” method in ASHRAE 15-2024, Safety Standard for Refrigeration Systems Addendum a in lieu of compliance with section 1109.2.5 of Washington State Emergency Rule WSR 25-13-051 (effective February 13, 2025, extended by WSR 25-05-059) which requires fire-resistance rated shaft enclosures for refrigerant piping penetrating two or more floor/ceiling assemblies in certain installations.

The permit application must demonstrate compliance with all of ASHRAE 15-2024, including addendum a, and include a code modification request for SDCI review and approval. The code modification and associated construction documents shall be prepared by a registered design professional in accordance with SBC Section 106.5.2. Any code sections not modified by this interpretation or by the State of Washington emergency rule WSR 25-13-059 apply.

A refrigerant controller installed between an indoor fan coil unit and an outdoor unit is considered part of the “refrigerant piping” and is not simply refrigerant pipe or tube as clarified by addendum a. As such, this equipment is required to be installed in a location with sufficient volume as determined in accordance with ASHRAE 15-2024, Section 7, in a space with mechanical ventilation that complies with ASHRAE 15-2024, Section 7.6.4, in a ventilated enclosure listed and installed in accordance with UL 60335-2-40 as allowed by ASHRAE 15-2024, Section 7.6.4 or a refrigerant machinery room is required.

For questions about whether this code solution applies to your project:

- If you have submitted a permit application, contact the Building/Mechanical Code plan reviewer assigned to your application.
- If you have not submitted an application, send us a question through the SDCI website.  
<http://www.seattle.gov/sdci/resources/send-us-a-question>.
- Visit the Applicant Services Center website for more information about hours and location.  
<https://www.seattle.gov/sdci/about-us/who-we-are/sdci-services>