

Why are states banning fluorescents?

Two Primary Reasons:

- 1. Safety: Fluorescent lights contain mercury. When fluorescent lamps break, mercury is released into the environment and can take a significant toll on both humans and the environment.
- **2. Energy efficiency:** Modern **LED technology** offers luminaires that are substantially more energy efficient than fluorescents.



California Fluorescent Ban

Legislation source: legislature.ca.gov

On September 2022, California lawmakers passed AB 2208, which sets the effective dates below prohibiting the sale or distribution of fluorescent lighting technologies:

 Screw-base & bayonet-base CFL: January 1, 2024

. Pin-base CFL: January 1, 2025

. Linear fluorescent tube: January 1, 2025

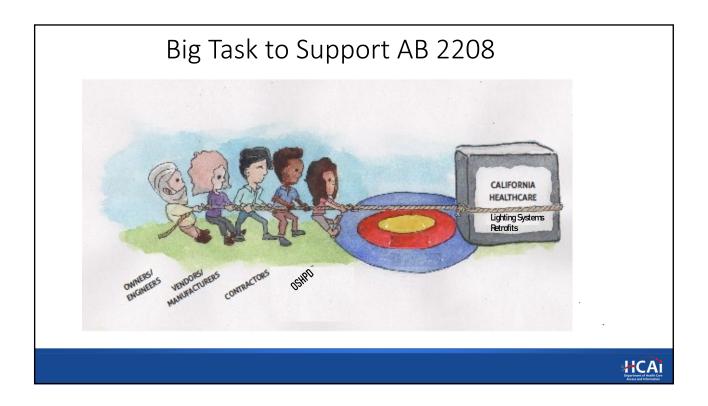


Assembly Bill No. 2208

CHAPTER 409

An act to add Chapter 16 (commencing with Section 109020) to Part 3 of Division 104 of the Health and Safety Code, relating to fluorescent lamps.



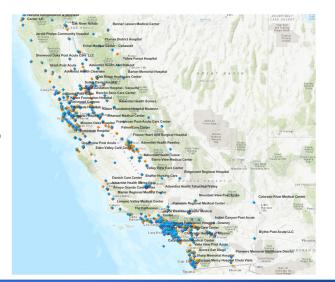


OSHPD FACILITIES

• SNF facilities in service: 1,122

• GAC facilities: 414

• Total Healthcare: 1,536

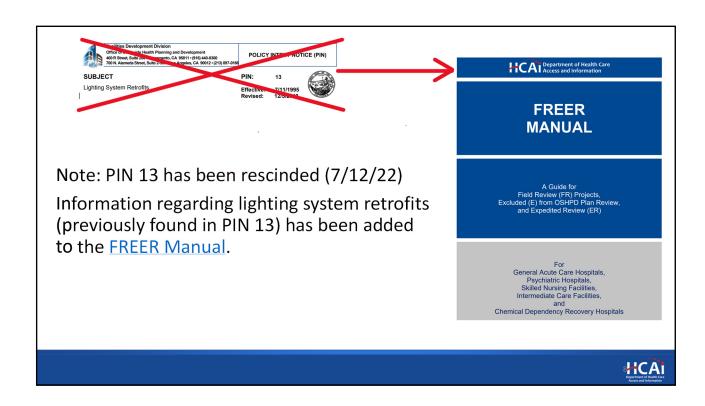


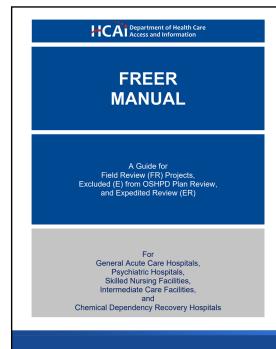


HCAI Webinar September 18, 2025

OSHPD is here to help INCREDIBLE SPORTSMANSHIP







The FREER manual is a guideline for

Field Review Projects or

Excluded from Plan Review or

Expedited Review Projects.

If the work qualifies, the steps required to start construction are streamlined.

We have included line items in this manual for converting fluorescent lighting to LED lighting which should facilitate response to AB 2208.



Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
	·					

Excluded (E) FR-E-ER

Excluded (E) FR-E-ER For Excluded work projects, there is not a requirement for submission of plans, building permit, or fees. New LED lighting projects will require submission of the <u>HCAI-OSH 102</u> form as indicated in the Project Table located in Section IX of the FREER manual to determine if can be considered as Excluded work.



HCAI added to following line items to the **FREER** manual to address upgrading fluorescent lighting to LED lighting:

- (E-6) one-for-one light fixture replacement at original location
- (E-8) UL Type A LED retrofit
- (E-9) UL Type A LED retrofit
- (E-10) UL Type A LED retrofit

All have the potential to qualify as **excluded** work.

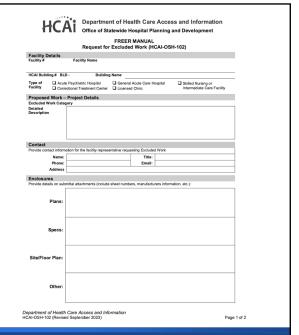
Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office)	Remarks
E-6	LIGHT FIXTURES Direct fixture Replacement		✓	YES		One for one, unlimited in amount. (Original location only). Va for replacement fixture is less than or equal to the second of the
					_	One for one tube
E-8	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight luminaire with UL TYPE A LED (lamp/driver combination unit) while fixture body remains as original condition		✓	YES		replacement. Internal luminaire wiring remains unchanged. Fixture body is to remain as original condition VA for retroff kit is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing.
E-9	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight with UL TYPE B LED (Impridriver combination unit)		✓	YES		One for one tube replacement. Ballast is bypassed or removed. Fixture body is to remain as original condition. VA for retrofit it it is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing.
E-10	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight with UL TYPE C LED (lamp and separate driver)		✓	YES		One for one tube replacement. Ballast is replaced with LED driver. Fixture body is to remain as original condition. VA for retrofit kit is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing to existing.



HCAI-OSH-102 Form is available for download from the OSHPD web page at. <u>HCAI-OSH-102 form</u>.

HCAI-OSH-102 form should include the following attachments:

- A key plan that shows areas where fluorescent fixtures will be retrofit or replaced with LED's
- A fixture quantity, type of retrofit/replacement matrix, existing lumens, new lumens, existing VA and proposed new VA ...
- Spec sheets for LED light fixture or LED retrofit kits
- Manufacturer's installation instructions for electric work to be performed.
- Schedule of proposed work





For LED Light Fixture
Replacements —Owner or
owner's representative should
submit form OSH-102
"Request for excluded work"
to OSHPD Compliance Officer
to determine if the proposed
work is excluded or not — if
accepted as excluded work
(i.e., no project) no permit is
required.



Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
E-6	LIGHT FIXTURES Direct fixture Replacement		✓	YES		One for one, unlimited in amount. (Original location only). VA for replacement fixture is less than or equal to fixture being replaced. Footcandle levels similar Existing slack wires (if not add) Fixture needs to match ceiling with mounting hardware and maintain rating for rated ceilings.



EXTERIOR FIXTURES - Direct replacement

Direct replacement of existing exterior building mounted light fixtures with new LED fixtures can be considered excluded work

- 1. 1-for-1 replacement
- New fixture weighs equal or less than the original
- Footcandle levels stay the same or increase
- Power consumption decreases or remains the same
- 5. Have equal or lower Backlight Uplight Glare (B.U.G.) ratings
- 6. Installed at same location of fixtures to be replaced

Will need to submit documents (HCAI-OSH-102) documents identifying fixture locations and types to confirm excluded work status. These documents will be reviewed in the field by the CO. Relocated fixtures will trigger a project which needs to be submitted to the field/office for review.





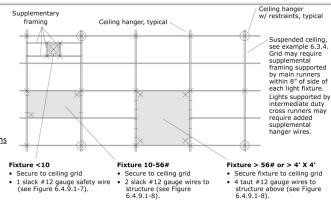


INTERIOR FIXTURES – Direct Replacement Direct replacement of existing interior light fixtures with new LED fixtures can be considered excluded work if:

- 1-for-1 replacement
- Fixture weighs equal or less than the original fixture
- Footcandle levels stay the same or increase
- Power consumption decreases or remains the same
- Installed at same location of fixtures to be replaced

Prior to installation, the contractor shall review existing ceiling conditions and specifically state that replacement fixtures will need to meet requirements of the existing conditions:

- Maintain ceiling ratings
- 2. Maintain or provide proper fixture supports form 102 should include a detail on how the contractor is required to support the light fixture independent of the ceiling system. (i.e. 1 or 2 slack wires for standard $\,$ downlights and lay-in fixtures) All replacement fixtures will need to e UL listed.



4 taut #12 gauge wires to structure above (see Figure 6.4.9.1-8).



INTERIOR FIXTURES – Retrofits

Retrofitting existing interior building mounted light fixtures with new LED fixtures can be considered **excluded** work if:

- UL listed Listed LED lighting retrofit kit required
- 2. **Reuse existing housing –** No need to address slack wires or rating of fixtures

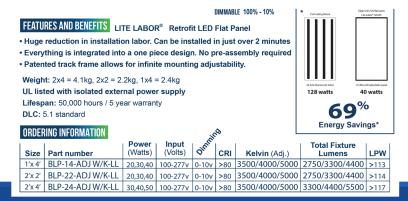






<u>LED retrofit luminaire conversion kits</u> were created to convert existing luminaires with other types of light sources (incandescent, fluorescent, HID, etc.) converted to energy efficient LED Luminaires.

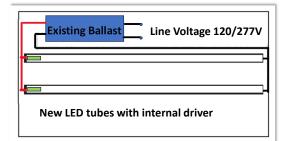
Certified (Classified) retrofit kits installed in accordance with their installation instructions into the identified Listed (Certified) luminaires provide a method to Certify (Classify) the combination of the host luminaire and the retrofit conversion kit to comply with the host luminaire Certification (Listing) requirements and the Certification (Listing) requirements for luminaires and retrofit kits in the National Electrical Code (NEC).



UL Type A LED Tube Retrofit

- · No rewiring needed
- Intended for direct substitution of a fluorescent lamp with a LED lamp/driver unit
- Designed with an internal driver that allows the tube to operate directly from the existing fluorescent ballast and is installed in existing fluorescent tombstones.
- Light fixture body remains as is with existing support

For type A LED fluorescent lamp retrofits -The client should submit form OSH-102 "Request for excluded work" to OSHPD Compliance Officer to determine if the proposed work can be considered excluded—if accepted as excluded work (i.e., no project) no permit is required.



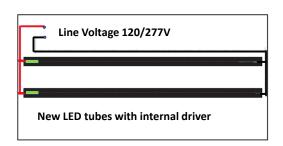
Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
E-8	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight luminaire with UL TYPE A LED (lamp/driver combination unit) while fixture body remains as original condition		√	YES		One for one tube replacement. Internal luminaire wiring remains unchanged. Fixture body is to remain as original condition VA for retrofit kit is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing.



UL Type B LED Tube Retrofit

- Rewiring to bypass ballast needed
- Operates with an internal driver (no ballast losses)
- LED lamps designed with an internal driver that allows the tube to operate directly from the line voltage
- Existing Light fixture body remains as is with existing support

For type B LED fluorescent lamp retrofits - The client should submit form OSH-102 "Request for excluded work" to OSHPD Compliance Officer to determine if the proposed work is can be considered excluded—if accepted as excluded work (i.e., no project) no permit is required.



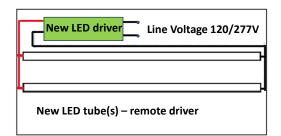
Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
E-9	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight with UL TYPE B LED (lamp/driver combination unit)		✓	YES		One for one tube replacement. Ballast is bypassed or removed. Fixture body is to remain as original condition. VA for retrofit kit is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing.



UL Type C LED Tube Retrofit

- · Offers the most flexibility and efficiency
- Unlike Type A and B, does not have LED driver provided integral with LED tube.
- Separate LED driver is connected between tombstones and building electrical wiring (branch circuit).
- Light fixture body remains as is with existing support

For type C LED fluorescent lamp retrofits - The client should submit form OSH-102 "Request for excluded work" to **OSHPD**Compliance Officer to determine if the proposed work can be considered excluded — if accepted as excluded work (i.e., no project) no permit is required.



Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
E-10	LIGHT FIXTURES (RE- LAMPING) Re-lamping existing fluorescent troffer or downlight with UL TYPE C LED (lamp and separate driver)		√	YES		One for one tube replacement. Ballast is replaced with LED driver. Fixture body is to remain as original condition. VA for retrofit kit is less than or equal to existing. Footcandle levels of retrofit kit are similar to existing.



So, let's get started for your project:

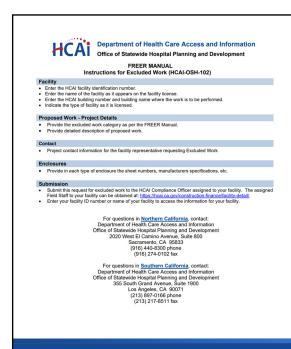
- (E-6) Direct Fixture Replacement
- (E-8) Retrofit via LED Type A
- (E-9) Retrofit via LED Type B
- (E-10) Retrofit via LED Type C

Download **HCAI-OSH-102 Form** and fill out. HCAI-OSH-102 form should include the following detailed information:

- A key plan that shows areas where fluorescent fixtures will be retrofit or replaced with LED's
- A fixture quantity, type of retrofit/replacement matrix that identifies retrofit or replacement, existing lumens new lumens, existing VA and proposed new VA
- Spec sheets for LED replacement light fixtures or LED retrofit kits
- Manufacturer's installation instructions for electric work to be performed.
- · Schedule of proposed work







How to fill out:

Provide the following, in addition to the detailed information (scope of work):

- HCAI facility ID #
- · Name of the facility
- HCAI building #
- · Type of facility license
- Project contact info for facility representative

Submit the request to HCAI Compliance Officer assigned to your facility see https://hcai.ca.gov/construction-finance/facility-detail/

OSHPD Compliance officer to send e-mail or other documented communication as formal direction to proceed(or not) with excluded work, there 3 options for responding to form 102:

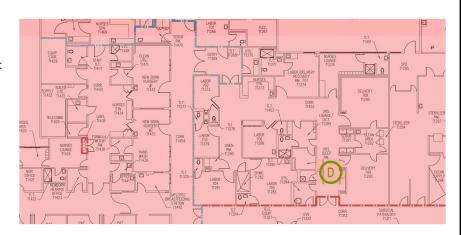
- Direct client to send more info
- · Approve as Excluded work
- Disapprove as Excluded work, client will need to submit plans



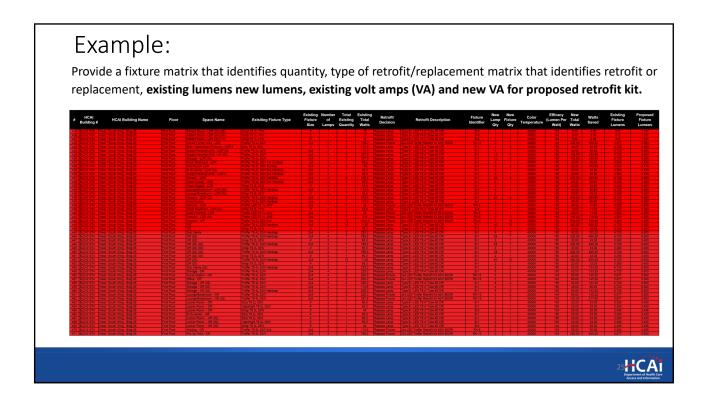
Example:

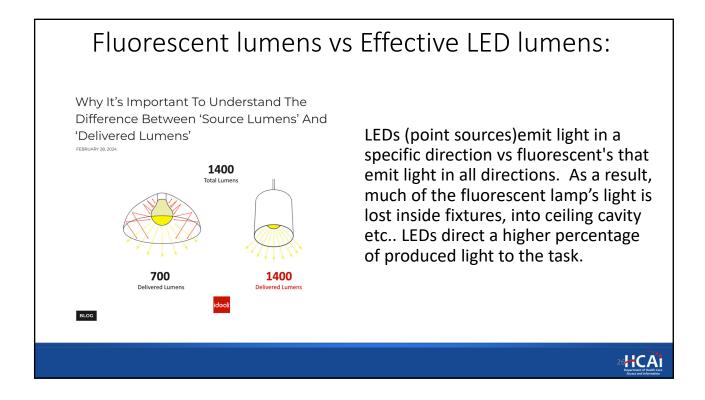
Provide a key plan that shows areas where existing fluorescent fixtures will be retrofit or replaced with LED's.

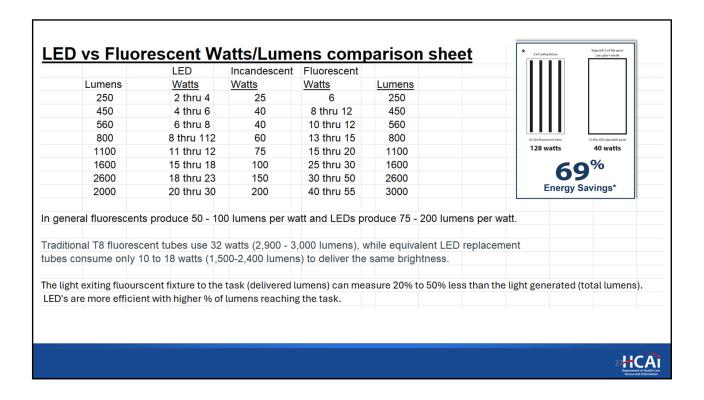
Can use exiting plans or other existing plans and just edit to show area of work (for reference) either manually or with computer.

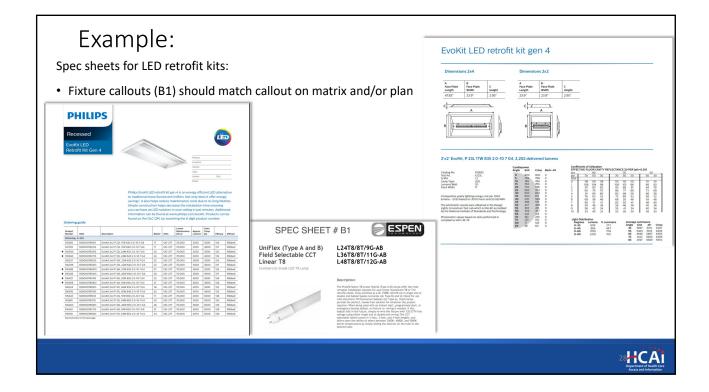


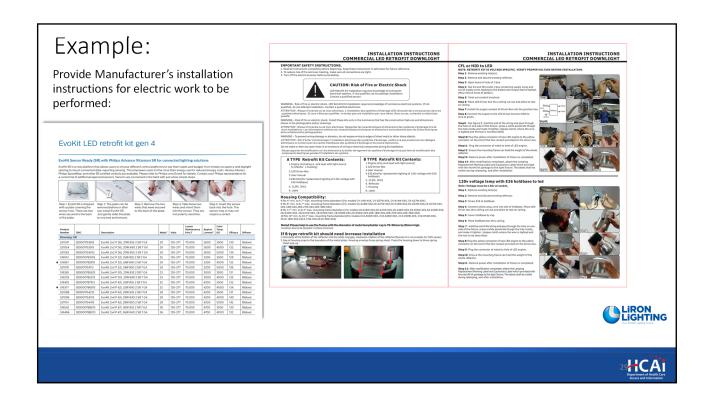


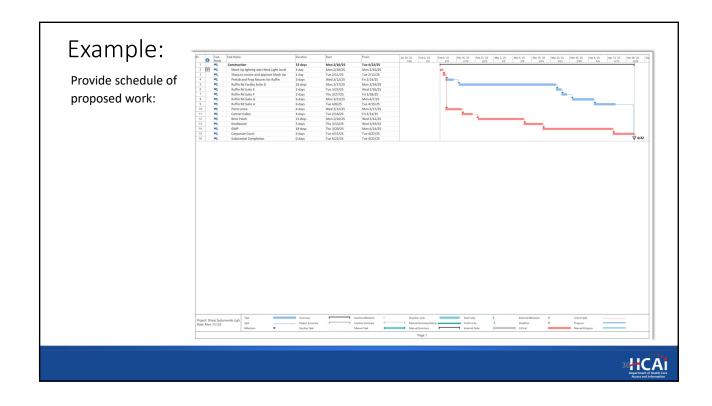












FAQ's:

Q1: Do I need to take foot candle (fc) measurements before and/or after retrofits?

A1: No, as long as the installed system matches matrix (which shows similar lumens for retrofit kits and power reduction), will not need to take fc measurements.

Q2: Does the \$50,000 limit for SB 1838 (exempt projects) come into play for FREER work on these LED retrofit projects?

A2: No, SB 1838 projects are a separate permit submittal that go thru the office and are not considered FREER excluded work.

Q3: Do I need to show that retrofit kits are UL listed?

A3: Yes, you will need to submit manufacturer literature that states UL listed and installation requirements with the listing.



FAQ's:

Q4: Do I need to hire an IOR or Design Professional of Record for excluded work?

A4: No, this is not a permitted project, so IOR/DPOR are not required.

Q5: Do I need to notify OSHPD at start date or finish date of LED retrofit work?

A5: Yes, you will need to submit a schedule with form OSH-102 and per the FREER manual

SECTION VII: HOW TO START CONSTRUCTION:

NOTE: For Excluded work that requires a HCAI-OSH-102 form, send an email or phone call notification to the OSHPD Compliance Officer (and OSHPD Fire Life Safety Officer when applicable) assigned to the facility when the Excluded work starts.

SECTION VIII: HOW TO CLOSE A CONSTRUCTION PROJECT

NOTE: For Excluded work that requires a HCAI-OSH-102 form, send an email or phone call notification to the OSHPD Compliance Officer (and OSHPD Fire Life Safety Officer when applicable) assigned to the facility once the Excluded work has been completed



FAQ's:

Q6: What if I start retrofit process and determine that I need to add or redesign portion(s) of the buildings lighting system (relocate fixtures, add fixtures use indirect vs direct fixtures etc...)

A6: A new project is required. See FREER category/item # E7 for requirements.

Q7: What if we want to change lighting controls? Upgrade controls?

A7: The proposed work should be shown of Form 102. Direct switch change outs/relocations are permitted under excluded work. Contractor will be responsible for compatibility of controllers with luminaires.

New daylight sensors, new power packs etc. will trigger requirement for submittal on new project. If new wiring is required.

Existing AB switches can be changed out to dimming controllers and still be considered as excluded work.

Item#	Category/Item	FR= Field Review	E= Excluded	(E Only) Form 102	ER= Expedited (Office) Review	Remarks
E-3	ELECTRICAL RECEPTACLES / LIGHT SWITCHES Existing General Purpose Relocation / Replacing used, wom our receptacles and switches		✓	YES		Compliance Officer to verify receptace type including circuit verify receptace type including circuit received by the compliance of the c



FAQ's:

Q8: Will excluded work trigger Title 24 Part 6 (energy Code) requirements?

A8: No, the only Part 6 requirements that would apply is that for all fixtures the retrofit or replacement fixture has lower VA than existing and that for exterior light fixtures the retrofit or replacement fixtures have a Backlit/Uplight/Glare (B.U.G.) rating that is lower than the fixture to be replaced (or meets current BUG rating requirements.)



FAQ's:

Q9: Can a facility plan to replace or retrofit luminaires installed in 1-hr ceiling still be considered excluded work?

A9: Let's take these one at a time.

- <u>Fixture</u> replacement- Yes, this can be considered excluded work, however as called out in item E-6 in the FREER manual, it
 will be the contractor's responsibility to ensure that replacement fixture(s) match ceiling type with mounting hardware and
 maintain the rating of existing rated ceilings.
- <u>Fixture retrofits</u>. Yes, this can be considered excluded work, however for retrofits, the existing housing needs to remain intact and as originally installed.

If the contractor or OSHPD field staff observes that a fixture to be replaced and or retrofit does not maintain the rating of existing rated ceiling, this should be reported and treated as a discovered non-code compliant condition. See the Architectural Narrative in <u>Advisory Guide 14 - Remodel</u> which states:

"12.Decision Box: Code Compliant when Constructed? (See California Existing Building Code Chapters 3, 3A,4, 4A, 5, and 5A)

a. If the discovered condition complies with the code that was in effect when the work was first constructed, it may remain. Go to item 13.

b. If the discovered condition IS NOT in compliance with the code that was in effect when the work was first constructed, it must be brought into compliance with the current code. Go to item 14.

c. Unauthorized work must be brought into compliance with the current code."



Moving Forward with LED retrofits

- Currently LED lighting retrofits are being sent to the office...
 - we should stay the course with these projects
- Webinar on LED lighting retrofits (9-18-25)
- Many LED lighting retrofits might be submitted as Excluded work
- Office to help Compliance officers Initially
- Field to take all projects that qualify as excluded work



HCAI Webinar September 18, 2025

