

NOTE: The following answers are provided to the webinar questions. For project specific questions, contact the HCAI/OSHPD Regional Supervisor assigned to the project.

Q1 What if design consultants tell us retrofits trigger Title 24, could they reach out to HCAI directly to confirm?

A1 Yes, we can meet to discuss. If you are just changing out or retrofitting fixtures (one-for-one) this would not trigger current Title 24 documentation/compliance.

Q2 Can the owner decide to do retrofit work without going through HCAI?

A2 No, we will need to be made aware of work at all facilities.

Q3 Does the package get submitted to the ACO of the Hospital? And are they familiar with this process?

A3 You should submit to the Compliance officer assigned to your facility. We have reviewed with the field and you should see consistent enforcement.

Q4 Submission to compliance officer via email or field review face to face

A4 "In order to submit a project for consideration of as excluded work. You should follow instructions on the HCAI-OSH-102 form which can be found on the HCAI website.

- Submit this request for excluded work to the HCAI Compliance Officer assigned to your facility. The assigned Field Staff to your facility can be obtained at: <https://hcai.ca.gov/construction-finance/facility-detail/>.
- Enter your facility ID number or name of your facility to access the information for your facility. This form can be submitted via E-mail. We do recommend that it could be beneficial to present to the CO in person and then to submit electronically (e-mail)"

Q5 What if you are only installing retrofits one or two at a time as bulbs fail? Do you need to submit for each time you do this?

A5 You should submit for the entire facility, and then in your schedule you can indicate that you plan to retrofit one at a time as bulbs fail. Take your best guess for schedule to complete entire building and then you can update if this changes.

Q6 Is this applicable also to relamping old LED to new LED

A6 Yes.

Q7 If I am replacing lamps "UL Type A" on exterior fixture, but the weatherproof lens on that fixture is broken, do I need to replace the lens?

A7 Yes any deficiencies with the housing/lensing/supports etc. found in the field should be fixed with retrofit process.

Q8 *I have heard that some LED lamps cut sheets state - not suitable for operating on generator power. Have HCAI encountered this?*

A8 No, This will be the entity who is relamping/replacing fixtures to work thru. We do ask for cut sheets for all retrofit kits/replacement fixtures to help avoid incompatibility issues, but ultimately this will be the entity who is doing the work to ensure that the system will work as intended.

Q9 *Please clarify how the contractor shall state that replacement fixtures will need to meet requirements of the existing condition, per page 8 of the presentation. Should a letter be included with the email sent to the OSHPD CO?*

A9 We recommend that a detail be provided that shows code compliant installation, and a note that says contractor shall verify code compliant or bring to code compliance (this can be added to the floor plans or catalog cuts.

Q10 *If we had additional questions on FREER LED, is the email regsunit@hcai.gov*

A10 Yes.

Q11 *Apologies, this does not related directly to LED conversion but is related to FREER Form 102 submissions. In the past we have had issues with Form 102 submissions (related to LED conversions and others) not being approved, addressed or even acknowledged following email submission. Due to the delay, we have seen facilities proceeding, at risk, with the scope without compliance officer congruence. Is there an official timeframe for compliance officers to provide congruence on the submitted Form 102?*

A11 None have been established we recommend that you contact the Regional Compliance office or Deputy Director for your area if there is a delay in getting response in a timely manner.

Q12 *Is it mandatory that all CA Hospitals and facilities go through the HCAI FREEER process in order to have the LED upgrades done?*

A12 We have set up this process to speed up the process, but you are welcome to submit a set of plans and go thru the standard project plan check/design observation process.

Q13 *Will LED Retrofits under "Excluded Work", require any existing lighting control switches to be relocated to meet ADA/CBC code requirements?*

A13 No. If you relocate lighting control switches this could mean that it does not meet excluded status. We will not require relocation to meet ADA/CBC requirements for LED replacement/retrofit projects.

Q14 Can retrofits be done by facility in house maintenance electricians?

A14 Yes.

Q15 Does HCAI-OSH-102 need to be prepared by licensed individual?

A15 No.

Q16 Will the FAQs be available on the HCAI website FAQs, or do they exist only on the presentation?

A16 We will add the FAQ's presented at the Webinar to this list.

Q17 Any specific cases where projects will be required depending on the type of space that the retrofit is being done? Critical care areas, etc.

A17 No, it is the scope of work that will drive the need to submit as a project. If structural is required for new fixtures, or retrofit/replacement fixtures are relocated from original location, or controls work beyond replacement of existing in place these type of changes will drive out of excluded status and into project status that would need a full submittal and permitting.

Q18 In a project that the existing ceiling lighting to be replaced with new can lighting, is the illuminated exit signs at the doors to the stairs required to be replaced as well or not?

A18 Exit signs do not need to be replaced, that would be your choice.

Q19 Does HCAI require positive attachment of retrofit kits

A19 You will need to submit and follow the manufacturers installation instructions.

Q20 Will HCAI check the existing ceiling seismic compliance?

A20 We will check the facility for unpermitted work at each visit as always, so any obvious non-compliant work will be tagged. We do not intend to go into any more detail on observations than we would if not LED retrofit work has been done.

Q21 Do I need to take foot candle (fc) measurements before and/or after retrofits?

A21 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.

Q22 Does the \$50,000 limit for SB 1838 (exempt projects) come into play for FREER work on these LED retrofit projects?

A22 No, SB 1838 projects are a separate permit submittal that go thru the office and are not considered FREER excluded work.

Q23 Do I need to show that retrofit kits are UL listed?

A23 Yes, you will need to submit manufacturer literature that states UL listed and installation requirements with the listing.

Q24 Do I need to hire an IOR or Design Professional of Record for excluded work?

A24 No, this is not a permitted project, so IOR/DPOR are not required.

Q25 Do I need to notify OSHPD at start date or finish date of LED retrofit work?

A25 Yes, you will need to submit a schedule with form OSH-102 and per the FREER manual

Q26 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...)

A26 A new project is required. See FREER category/item # E7 for requirements.

Q27 What if we want to change lighting controls? Upgrade controls?

A27 "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. "

Q28 Will excluded work trigger Title 24 Part 6 (energy Code) requirements?

A28 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.)

Q29 Can a facility plan to replace or retrofit luminaires installed in 1-hr ceiling still be considered excluded work?

A29 Let's take these one at a time.

Fixture 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.

Fixture retrofits - 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 Advisory Guide 14 - Remodel 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.”