



DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
EUROPE
UNIT 23103
APO AE 09136-3103

IMEU-PWD

4 September 2019

MEMORANDUM FOR Commanders of United States Army Garrisons (USAG) in Europe

SUBJECT: Installation Management Command-Europe (IMCOM-E) Air-Conditioning (AC) Policy

1. Supersession. This memorandum supersedes memorandum, IMCOM-Europe, IMEU-PWD, 10 Jul 2018, subject as above.
2. References:
 - a. Executive Order (EO) 13834, 17 May 2018, Efficient Federal Operations
 - b. UFC 3-410-01, HVAC Systems, 1 Nov 2017
 - c. UFC 4-711-01, Family Housing, 10 Aug 2018
 - d. AR 420-1, Army Facilities Management, 24 August 2012
3. Applicability. This policy applies to all permanent-party and transient-party occupied facilities on or within IMCOM-Europe managed installations in Europe.
4. Background.
 - a. The AC Policy is to support garrisons in their effort to balance directed energy use/cost reduction goals with desired cooling season support to Service Members and their families. Garrisons must continue to explore alternative cooling solutions and ensure proper Executive Orders, Codes and Regulations are applied when considering the approval of new AC installations and/or use of portable devices.
 - b. Federal Goals. EO 13834 mandates that all Federal agencies achieve and maintain annual reductions in building energy use and implement energy efficiency measures that reduce costs.
 - c. UFC 3-410-01, HVAC Systems, 1 Nov 17: 3-5.1 Facility Air Condition Eligibility, states "Facilities are eligible for air conditioning where facilities of similar structure and function in the local private sector are equipped with air conditioning." With the exception of USAG Italy, local private sector facilities typically do not utilize AC.
 - d. UFC 4-711-01, Family Housing, 10 Aug 2018, page 38: 5-2.4 Air Conditioning states, "In new construction and improvements, provide air conditioning in locations where during the six warmest months of the year dry bulb temperature is 26.7 degrees C (80 degrees F), or higher for over 650 hours; or wet bulb temperature is 19.4 degrees C (67 degrees F), or higher for over

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800 hours in accordance with OMB Circular A-45." Currently, no garrison outside of USAG Italy meets this criteria. Additionally, AC is not commonly installed in local private homes.

5. HVAC Approval Authorities.

a. The Director, IMCOM-Europe is the approval authority for the installation of new AC systems, or the complete replacement of an existing system, when a renewable energy offset is not provided, and the installation of AC is beyond the Garrison Commander approval authority as specified in 5.b.

b. The Garrison Commander is the approval authority for all other requirements. Approval authority may be delegated to the Director of Public Works (DPW).

(1) Installation of new AC systems, or the complete replacement of an existing systems, when a renewable energy offset is provided. An offset is when a renewable energy source is funded and implemented in conjunction with the installation of the AC and exceeds the electrical consumption of the AC unit.

(2) Facilities or spaces that have air conditioning and change use or are assigned to a new organization.

(3) Communications and Server Equipment Rooms.

(4) Health Care Facilities.

(5) Secure facilities where windows cannot open or do not exist and mechanical ventilation is not life-cycle cost effective.

(6) Use of portable AC devices in AFH and spaces when justified due to a medical condition that warrants AC (if not currently approved) or when justified due to Life, Health, Safety. The medical condition and need for portable AC must be recognized as a medical necessity through the Exceptional Family Member screening program or confirmed by the Commander of the medical facility and O-5 or above.

(7) Use of portable devices in accordance with paragraph 6.b.

c. USAG Italy. Because facilities located in USAG Italy are within UFC criteria, the Garrison Commander is the approval authority for all facilities. Approval authority may be delegated to the DPW.

6. Guidance.

a. Requests.

(1) Requests for AC will be sent by the requesting agency, in writing, through the DPW for endorsement, and staffing to the Garrison Commander for approval, if required. Requests requiring approval of the Director, IMCOM-Europe, will additionally be staffed through the Office of the Assistance Chief of Staff (ACoS) G4 prior to being forwarded to the Director for decision.

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(2) All requests will include a valid justification for review against applicable UFCs, Directives and guidance.

(3) Any modification to Real Property must be coordinated and approved through the DPW utilizing DA Form 4283.

b. Portable Devices:

(1) Family Housing. The Garrison Commander may approve the use of portable cooling devices in Army Family Housing.

(a) Acquisition, maintenance and safe use of the portable device is the responsibility of the Service Member (SM). Any damages and/or associated repair costs caused by the acquisition and/or use of the portable device is the responsibility of the SM.

(b) To minimize electrical system impacts and energy costs, portable cooling device use is to be limited to peak heat hours. Fans and natural ventilation are to be used during evening hours.

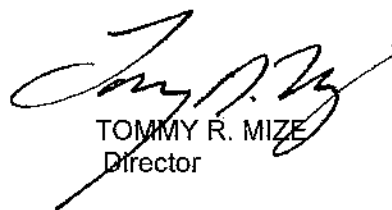
(c) Portable devices are to meet a European Union Energy Label designation of "A+" or better (which is comparable to and meets the same intent of the U.S. Environmental Protection Agency ENERGY STAR label and rating).

(d) Window units, thru-the-wall heat pumps, or installation of cooling units that require modification to government real property is prohibited.

(2) Other than Family Housing. The Garrison Commander may approve the use of portable cooling devices in spaces other than Family Housing when justified due to Life, Health, Safety. Requests for approval are to be submitted by the agency in accordance with 6.a.(1).

(3) The operation of portable cooling devices is prohibited when the intent is to circumvent obtaining approvals in accordance with this policy.

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