

Hydrofluorocarbons (HFCs) Chapter 173-443 WAC

Rulemaking Stakeholder Meeting

December 17, 2019



WA Hydrofluorocarbon Law

RCW 70.235.080, et al.

- HFC restriction dates set in law
- Initial notification by Dec 31, 2019
- Status update notification within 120 days of an applicable restriction date
- Product labeling

More information:

www.ecology.wa.gov/HFC

www.ecology.wa.gov/HFCrulemaking



Agenda

- Welcome & logistics
- Rulemaking economic analyses overview
 - What to expect during process
 - Questions to consider
- Labeling strategies
 - Review proposed labeling strategies
- Next steps

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Economic Analysis at Ecology

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Overview

- **Our economic analyses support:**
 - Rules
 - General permits
 - Legislative reports and requests, Chemical Action Plans, etc.
- **Our economic analyses rely on:**
 - Real world quantitative data
 - Qualitative information
 - Comprehensive regional economic models
 - Rigorous methods
- **Economics analyses are conducted independently**



Economic analyses during rulemaking

Rule Proposal Phase (CR-102)

- ***Preliminary Regulatory Analyses*** document published with proposed rule language

Rule Adoption Phase (CR-103)

- ***Final Regulatory Analyses*** document published with final rule language
- Response to economic comments in CES



How can you contribute?

- We regularly work with stakeholders to:
 - **Gather data**
 - Baseline operating costs
 - Anticipated costs or benefits related to the change
 - Potential qualitative impacts
 - **Check assumptions**
 - **Truth our modeling structure**



A few key questions to consider

- How would the rule changes affect you?
- What specific costs or benefits do you expect as a result of the changes?
- In what ways could we achieve the goals of the changes while mitigating costs to you?

See “Economic questions” handout for more info



Thank you

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Labeling Strategies

Aerosol Propellants: 1:45 p.m. – 2:20 p.m.

Foams: 2:30 p.m. – 3:30 p.m.

A/C, Refrigeration: 3:30 p.m. – 4:20 p.m.



Aerosol Propellants

Consumer products	<ol style="list-style-type: none">1) Substitute listed on product label, or,2) Substitute listed on box or packaging label, or,3) An on-product symbol plus online substitute disclosure, or,4) An on-box or on-packaging symbol plus online substitute disclosure.
Other products (with demonstrable regulatory label format limitations)	<ol style="list-style-type: none">1) Any of the options above (1-4), or,2) A product insert (SDS or paper disclosure) and online disclosure.



Foams

	Labeling and Disclosure Requirement(s)
Flexible polyurethane	<p>For manufacturer end-use products: Substitute disclosed on unit label and/or any of the consumer product options below.</p> <p>For consumer end-user products:</p> <ol style="list-style-type: none"> 1) Substitute listed on product label, or, 2) Substitute listed on box or packaging label, or, 3) An on-product symbol plus online substitute disclosure, or, 4) An on-box or on-packaging symbol plus online substitute disclosure.
Rigid polyurethane: Marine Flotation	<p>Substitute disclosed on unit label, or, in lieu of or in addition to unit labels, either:</p> <ol style="list-style-type: none"> 1) Substitute listed on product label, or, 2) Substitute listed on packaging label, or, 3) An on-product symbol plus online substitute disclosure, or, 4) On-packaging symbol plus online substitute disclosure.
Polystyrene extruded sheet	
Integral skin polyurethane	
Polyolefin	
Polystyrene extruded boardstock and billet	
Rigid polyurethane: Sandwich Panels	
Phenolic insulation board	
Bunstock	
Rigid polyurethane: Spray	<p>Substitute disclosed on</p> <ol style="list-style-type: none"> 1) A label on the canister or cylinders, or, 2) On a box or packaging label, or, 3) On an on-box or on-packaging symbol plus online substitute disclosure.



Chillers, Refrigeration, and Foam

Refrigerator Equipment Foam	Labeling and Disclosure Requirement(s)
Rigid polyurethane: Appliances	Unit label
Rigid polyurethane: Commercial Refrigeration	In addition, see refrigeration requirements related to disclosure of foam to end users of refrigeration products.

Air Conditioning and Refrigeration

	Refrigerant(s)	Foam Installed or Blown in Product at Manufacturer
Built-in residential consumer refrigeration products	Applicable substitute listed on safety label (UL or equivalent) on product.	Substitute disclosed: 1) On UL Label, or, 2) On dedicated label, or, 3) In owner's manual.
Compact residential consumer refrigeration products		
Residential consumer refrigeration products other than compact and built-in residential consumer refrigeration products		
Vending machines		
Stand-alone units	1) Applicable substitute(s) listed on safety label (UL or equivalent) on refrigeration equipment, or, 2) On dedicated label.	Substitute disclosed: 1) On dedicated label, or, 2) In owner's manual, or, 3) Through an on-equipment symbol (approved by Ecology) plus online substitute disclosure.
Centrifugal chillers		
Positive displacement chillers		
Refrigerated food processing and dispensing equipment		
Remote condensing units		
Supermarket systems		
Cold storage warehouses		



Next Steps

- **Dec 31, 2019** initial notifications due
- **January 28, 2019** stakeholder meeting
- **Jan. – Feb. 2020** post names of manufacturers who submit initial notification on HFC website
- **Jan. – March 2020** draft rule language
- **March – April 2020** begin economic analysis outreach

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Rulemaking Timeline

Nov. 2019 – March 2020	Hold stakeholder meetings
Jan. – March 2020	Draft rule language
April – June 2020	Prepare rule proposal materials <ul style="list-style-type: none">• Regulatory Analyses• State Environmental Policy Act (SEPA) checklist• Proposed rule language
June 2020	Propose rule, open public comment period
July 2020	Public hearing, close public comment period
Oct. – Nov. 2020	Adopt rule
Nov. – Dec. 2020	Rule effective (31 days after adoption)

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Contact Info

Find more information:

HFC Program: www.ecology.wa.gov/HFC

HFC Rulemaking: www.ecology.wa.gov/HFCrulemaking

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