

HFC Rulemaking, Chapter 173-443 WAC May 10, 2022 Stakeholder Meeting Summary

Updated draft language review – stakeholder comments

Definitions (Section 030)

“Residential dehumidifier” Ecology added definition for this term, but did not include language to exclude basement or crawlspace dehumidifiers as requested by one manufacturer.

- At least one manufacturer asserted that they consider basement or crawlspace dehumidifiers part of whole home systems. Another said that they are typically the same equipment, no matter where installed. Manufacturers have no control over this.

“Industrial process refrigeration” Ecology added a sentence that we will consider chillers used for industrial process refrigeration chillers used for industrial process refrigeration.

- Concern that definition strayed from the federal definition and will provide recommendations.

“Chiller” Ecology added a sentence that we consider chillers used solely for comfort cooling as air conditioning; otherwise, definition is unchanged.

- General support. Stakeholders may provide suggestions from other rules.

“Commercial refrigeration equipment” Ecology added “or use” to clarify that commercial refrigeration includes commercial uses beyond retail sales.

- Request for definition to refer also to the compressors, condensers, etc. The equipment that does the work to chill/freeze products in the display case.

“Nonessential consumer products” Ecology copied the list of products under EPA federal rule 40 CFR Part 82.66 and 82.70 (Nonessential class I product and exceptions...) with modifications to include HFCs.

- Question on (2) cleaning fluid for electronic and photographic equipment: Does this include the energized products. We had an exclusion under the current rule for energized products. Stakeholder will check on this and get back to Ecology.

List of prohibited substances: (Section 040, Tables 2, 3, and 4):

- Ecology moved the effective date for all refrigeration equipment, except for ice rinks, to January 1, 2025, to align with [Chapter 70A.60 RCW](#). With some exceptions, the refrigeration and air conditioning thresholds cannot take effect prior to 24 months after adoption of new safety standards into the state building code.
 - No concerns raised.
- Commercial ice machines (Table 2) – Ecology is prepared to remove commercial ice machines from requirements pending documentation/request from industry.
 - No concerns raised. Comment that industry is still testing refrigerants for ice machines.
- Residential dehumidifiers (Table 3) – Ecology is keeping January 1, 2024 effective date at this time. EPA SNAP program is reviewing alternatives for dehumidifiers. Ecology will track these developments.
 - Continued concern that EPA SNAP program will not approve A2L refrigerants (R32) for residential dehumidifiers before the 2024 effective date and that building codes are not all updated. Manufacturers may struggle to meet this timeline.

- Chillers (Table 4) – New addition. Ecology added a GWP threshold for chillers used for industrial process refrigeration, based on the temperature of the chilled fluid.
 - No concerns raised.

Stakeholder questions

- Is Ecology going to post the presentation?
 - Yes. It may take a week or so. If you need them sooner, please contact any of our team.
- Was there consideration given to the energy efficiency of the lower GWP refrigerants?
 - Ecology has heard this concern from the manufacturers, but we are not directly addressing the energy piece.
- Are there definitions for “comfort cooling” and “industrial process?”
 - Not for comfort cooling. Industrial process refrigeration is defined in the draft rule language. We will consider adding a definition for comfort cooling.
- By “low-GWP,” do you mean 150?
 - Yes, 150 for refrigeration. The GWP threshold for air conditioning will be 750.
- Do the GWP effective dates mean that we have to replace all equipment by then?
 - No. The effective date applies to new equipment purchased after that date. Owners/operators do not need to replace existing equipment by that date.
- Is Ecology going to address the growing concern of HFO replacements that break down into PFAS/TFA or high GWP components in the lower atmosphere?
 - We are aware of this issue. The U.S. Climate Alliance states are also discussing this issue.
- What about refrigeration systems containing less than 50 pounds of refrigerant?
 - The GWP threshold will only apply to refrigeration systems with more than 50 pounds. Equipment with less than 50 pounds falls under the SNAP-like prohibitions in our current rule.
- Is there an exemption for permits?
 - Yes, when a new facility has an approved building permit before the effective date.
- What percentage of new equipment in existing stores triggers the 150 GWP requirement?
 - The definition for “new” as it applies to cumulative replacement is when the cumulative cost exceeds 50% of the capital cost of replacing the whole system.

Future stakeholder meetings

- July 6
- August 16
- September 29

All meeting times are 9:30 am to 12:00 pm PDT.