



Center for Energy Efficiency & Sustainability
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March 25, 2020

Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503
(Submitted via [web portal](#))

Re: Response to Proposed Changes to Chapter 173-443 WAC, Hydrofluorocarbons (HFCs)

We appreciate the opportunity to provide the following comments to provide input to Washington as it considers implementation of the vacated U.S. EPA SNAP Rules 20 and 21.

Trane Technologies is a climate company that includes the strategic brands Trane® and Thermo King®, and a portfolio of environmental products and services. Trane Technologies brings efficient and sustainable climate solutions to buildings, homes and transportation.

Trane and Thermo King use HFC refrigerants in its stationary and transport air conditioning and transport refrigeration products globally. The company began transitioning its Trane high-performance chiller portfolio with low-global warming potential (GWP) refrigerant alternatives in 2015 globally. We began transitioning our transport refrigeration products to lower GWP refrigerants in the EU in 2014; those products are available in the U.S. today.

These efforts helped the company meet its climate commitment to reduce refrigerant-related emissions from our product lines by over 50% and our operations by over 35% by 2020, and invest \$500 million in research and development for long-term emissions reductions. Last year, our Trane and Thermo King brands committed to reduce our customer's emissions by 1 Gigaton (1 billion metric tonnes) by 2030. Transitioning away from high GWP HFCs with highly efficient products will help us meet this goal.

We are a member of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). We agree with the AHRI comments but offer additional clarification around the definition of remote condensing units.

Remote Condensing Units

Consistency between states is important to help reduce unnecessary consumer costs. The U.S. EPA describes remote condensing units with 40 CFR Part 82 V.C.1.(a) as follows:

“Remote condensing units” means retail food refrigeration equipment or units that have a central condensing portion and may consist of compressor(s), condenser(s), and receiver(s) assembled into a single unit, which may be located external to the sales area. The condensing portion (and often other parts of the system) is located outside the space or area cooled by the evaporator. Remote condensing units are commonly installed in convenience stores, specialty shops (e.g., bakeries, butcher shops), supermarkets, restaurants, and other locations where food is stored, served, or sold.

Though Washington does not list the refrigerant used for comfort cooling remote condensing units in WAC 173-443-040, the definition may lead to confusion. We propose the addition of “food” to Washington’s proposed definition to reduce confusion and facilitate a smooth refrigerant transition.

We appreciate the opportunity to provide these comments. Please contact me with any questions.

Sincerely,

Nanette Lockwood

Nanette Lockwood
Global Director, Policy and Advocacy
Trane Technologies