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(Submitted online at <http://aq.ecology.commentinput.com/?id=g7B9h>)

Comments to Washington: Chapter 173- 443 WAC, Hydrofluorocarbons

The following comments are from Daikin US Corporation (Daikin US) in response to the Washington State Department of Ecology (Ecology) public hearing on July 21, 2020 regarding the Chapter 173-443 WAC proposed rule language to regulate HFCs.

On September 26, 2019, Daikin announced its intent to develop ducted and ductless residential, light-commercial, and applied products utilizing R-32 refrigerant for the North American market. Daikin selected R-32 due to the drastically lower GWP profile when compared to the currently commonly used R-410A, its energy efficiency benefits, and the ease to reuse, reclaim, and recycle the refrigerant.

While Daikin US contends that federal regulations are the most desirable way to regulate the phase-down of hydrofluorocarbons, we intend to work with individual states to assist states and territories to adopt and implement consistent laws and regulations

Thank you for considering comments received during the previous stakeholder meetings, especially those related to use of UL labels as a disclosure method for refrigeration equipment and chillers. Also, thank you for clarifying that foam installed in refrigeration equipment and chillers may be disclosed in an owner's manual.

In addition, we recognize and thank the Department of Ecology (Ecology) for adding clarification that except for retrofit, nothing in the regulation requires an individual to cease use of equipment prior to the effective date of the regulation.

Finally, we would like to thank Ecology for adding a definition of "new," which is in line with most other states currently pursuing an HFC phasedown regulation

Daikin US's comments will focus on suggestions on aligning regulations across states and with the EPA's SNAP 20 and 21 rules to create a harmonized framework of HFC regulations across the country.



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Definitions

Daikin US also still supports adding a definition for reclaim as follows:

“Reclaim” means to reprocess recovered refrigerant to all of the specifications in appendix A of this subpart (based on AHRI Standard 700-2016, Specifications for Refrigerants) that are applicable to that refrigerant and to verify that the refrigerant meets these specifications using the analytical methodology prescribed in section 5 of appendix A of this subpart.

Finally, Washington has not included a definition of the word “use” and Daikin US will happily assist in crafting and updating definitions that are both clear and as uniform with other states’ regulations as possible. We welcome any feedback that staff may have regarding these included definitions or any other future definitions.

Disclosures

Once again, Daikin would like to thank Ecology for accepting the UL label as meeting disclosure requirements. However, if Washington chooses to add additional forms of disclosure, Daikin US supports AHRI’s suggestion of online disclosure as a means of disclosure that does not burden manufacturers while utilizing existing labeling methods.

Clarification of Foam Disclosure Requirements

Likewise, Daikin US still believes that “Non-Retail Foam Products” should not include air-conditioning equipment other than chillers (such as unitary or air-side equipment) based on the scope of this regulation. Thus, HVAC equipment other than chillers are not required to disclose foams containing HFCs. We would like to further clarify that products that are prohibited and exempted based on this regulation should not be subject to labeling requirements in this regulation.

Reclaim

Daikin US recommends Washington consider adding provisions to promote refrigerant reclamation in order to promote best practices. As the only HVACR equipment manufacturer that is also a producer of refrigerants, we suggest that an essential part of any strategy to reduce HFC emissions should be to address refrigerant management. Any ban that does not exempt reclaimed product will leave stranded all existing equipment that relies on a banned refrigerant. We believe that any strategy should not only exempt reclaimed refrigerant but should start with a heavy emphasis on the value of refrigerant reclamation as a means to reduce emissions and we strongly recommend that Washington not only exempt it from future sales bans, but also take affirmative steps to promote reclamation. A strategy that promotes the recovery, reclamation and re-use of refrigerants directly achieves the goal of reducing HFC emissions by



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eliminating, or at least reducing, the need to service existing systems with newly manufactured product.

Daikin recommends the state suggest and encourage that reclamation should also be done in conjunction with mandatory leak repair per existing US EPA requirements.

Technician Training

Training and servicing requirements for technicians will be important considerations for future regulations. The industry intends to develop a standardized training program for technicians, contractors, wholesalers, and trainers. As with past refrigerants transitions, training will be important so that installation, repairs, and maintenance will result in optimized performance and minimized refrigerant losses. Addressing the safety concerns with A2L refrigerants is paramount. On this topic Daikin is willing to work with Washington and other stakeholders to provide guidance on training materials and curriculum.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink that reads "Charlie McCrudden".

Charlie McCrudden
Director, Government Affairs