



Washington State Tree Fruit Association

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August 31, 2023

Linda Kildahl
Washington Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: Chapter 173-443 WAC, Hydrofluorocarbons (HFCs) and Other Fluorinated Greenhouse Gases Rule

Thank you for the opportunity to provide comments on the Washington State Department of Ecology's proposed regulatory amendments to the current HFC regulations.

WSTFA represents the growers, packers, and marketers of apples, pears, cherries and other tree fruits in Washington State. WSTFA has estimated the state's fresh apple crop at just over 134 million 40-pound boxes in 2023. While apples are currently being harvested, the crop is stored in controlled temperature conditions which in some cases involves the use of Hydrofluorocarbons. These same apples harvested now can be packed throughout the next year to continue to supply markets domestically and internationally when refrigerated controlled atmosphere storage is used.

Under the Proposed WAC Revisions, some of our members will be impacted. The current proposed language states that there will be added prohibitions on refrigerants with a Global Warming Potential (GWP) of 150 or more in new refrigeration equipment. This new ruling would require all new systems to be less than 150 GWP by January 1, 2025. While Ecology has been considering this issue, many users are only now becoming aware of these proposed changes.

We encourage you to allow longer public review and comment before taking final action. We also recommend the federal rule be finalized before any adoption of a state rule to avoid confusion or the possibility of conflicting guidance. Thank you for the opportunity to express our concerns.

Sincerely,

Ranie L. Haas
Director of Regulatory and Industry Affairs
Washington State Tree Fruit Association