

Devon Kellogg

Greetings Department of Ecology,

As a parent and an educator of young children, I am deeply concerned about the sustainable care of our planet and climate.

I am relieved to see attention to given to the monitoring of refrigeration systems in WA state with the goal of reducing HFCs in our atmosphere. I ask you to consider rules for two additional high GWP fluorinated gas sources as well:

SF6 is a fluorinated gas compound used in electrical power systems. According to the EPA, SF6 is the most potent greenhouse gas known. It is 23,500 times more effective at trapping infrared radiation than an equivalent amount of CO2 and stays in the atmosphere for 3,200 years.

The refrigerants used in certain air conditioners and heat pumps are also be quite potent greenhouse gases, as described here:

<https://www.epa.gov/newsreleases/epa-moves-forward-phase-down-climate-damaging-hydrofluorocarbons>

In both of these cases, there are alternatives available with far lower atmospheric warming potential.

During this HFC rulemaking process, please make sure rules are developed such that utilities, developers, and HVAC installers will use the least harmful alternatives to these potent gases when upgrading/expanding electrical grids and installing/replacing HVAC equipment.

Thank you for your consideration,
Devon and Family