



August 31, 2023

Department of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600

Husmann Corporation
12999 St. Charles Rock Road
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Re: Husmann Corporation Comments Washington Department of Ecology Chapter 173-433 WAC Hydrofluorocarbon (HFCs)

To: Department of Ecology Team:

These comments are submitted by Husmann Corporation in response to the Department of Ecology rulemaking under Chapter 173-433 on hydrofluorocarbons (HFCs).

Husmann, a North American leader in providing display merchandisers, refrigeration systems, installation and services to food retailers around the world would first like to thank the Ecology staff for the time, effort and open communication with OEMs and retailers necessary to develop the proposed regulation. Husmann, a member of AHRI, has worked diligently throughout the development of this proposed regulation and has provided detailed industry information and equipment technology capabilities to both AHRI and Ecology. Husmann has supported both the development of AIM as well as the signing of the Kigali Amendment and we realize the importance and significance of a national regulatory framework.

Husmann supports comments submitted to Ecology from AHRI regarding Chapter 173-433. The additional Husmann comments below are to add emphasis to key areas of our concern.

Husmann requests that Ecology either withdraw the proposed rule or propose a state rule which aligns with efforts by the EPA in the AIM Act. Under AIM the EPA is addressing HFC refrigerant allocation, equipment technology transition, and refrigerant management. One national timeline for compliance using one set of refrigerant GWP levels benefits retailers (many of which are national chains), manufacturers, and ultimately the consumer.

Husmann requests that Ecology reconsider their position on refrigeration system retrofits. Ecology expressed concern about retrofitting and the use of refrigerants above 150 GWP during public webinars and now in the proposed rule. Allowing retailers to change a high GWP refrigerant such as R404A or R507A to R448A or R449A reduces system GWP by nearly 2/3. Additionally during a retrofit the retailer will take time and effort to tighten up the system to reduce leaks. This allows the retailer to capture the full life of a refrigeration system. There are NO refrigerants with a GWP less than 150 that can be used for retrofitting. This means that higher GWP systems with higher leak rates

will continue for a longer period of time, likely to reach a point when it is no longer economically feasible to purchase the higher GWP refrigerant due to less supply as a result of the AIM allocation, and at that time force a retailer to make a decision to then replace the system which may have years of lifetime remaining (very expensive) or possibly shuttering the facility due to the expense and creating potential food deserts.

Thank you again for the opportunity to comment on the Ecology Chapter 173-433 WAC HFC proposed regulation. Hussmann looks forward to working with the Department to create a feasible path for our industry to achieve an orderly phase down of HFC refrigerants. Please let me know if you have any questions regarding these comments.

Sincerely,

Ronald Shebik
Director, Government Affairs and Regulatory Affairs
Hussmann Corporation