

Washington State University

Comments on WAC 173-443 Hydrofluorocarbons (HFCs) and Other Fluorinated Greenhouse Gases
Proposed Rule Public Hearing 8/31/23

Washington State University (WSU) attended the public hearing for the proposed HFC Rule (WAC 173-443) and reviewed the proposed rule and guidebook. WSU requests clarifications and expresses some concern for the following:

WSU is concerned with the availability of refrigerants meeting the low global warming potential (GWP) thresholds required for use in future equipment. Currently, refrigerants meeting the proposed GWP thresholds are flammable and existing systems were designed to International Fire Code and International Building Code at time of construction. Replacing equipment with those utilizing flammable refrigerants could lead to cost prohibitive capital projects required to meet building codes.

In addition, a clear definition of -1-Air Conditioner-1- is requested. This request is closely aligned with the Washington Department of Ecology mandate to reduce GHG emissions. In order to help meet this goal, one of the strategies WSU capital projects will employ is utilization of air source heat pumps. Air source heat pumps require refrigerants to operate, and by definition is a type of air conditioner. This would run counter to the new proposed HFC rule. Specifically, we are concerned with whether a heat pump is considered an air conditioning unit. Eliminating this technology will essentially result in WSU emitting more greenhouse gases than emitted by refrigerants used in current heat pump technology.

-1-Mothballing-1- should be replaced with technical language.