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Chapter 173-443 WAC, Hydrofluorocarbons (HFC)

There are several large state-run entities that will suffer from the implementation of the rules contained in this WAC. Most facilities get replacement units through the capital budget process. During this session, only 16% of the requested budget is expected to be funded. Due to this process, managers are forced to pick between projects to keep facilities functioning. Throughout the state, there are several hundred air conditioning units, refrigeration systems, and chillers that run on refrigerant removed from purchase in 2024. At the beginning of 2025, several additional refrigerants are pushed off the list.

The removal of these refrigerants at such a rapid pace affects many facilities. We have a limited operating budget to conduct maintenance. General maintenance typically does not include replacement of equipment since it dips into the public works realm. We have tried multiple times to convert old systems to new refrigerants, and have lost compressors, which compounds the problem with a limited budget. Facilities typically get funded for projects that are in the 10-year capital budget. This process is slow and can take multiple biennia to complete projects. By putting such tight timelines on the types of refrigerants used in Washington, the legislature is forcing undue stress on facility maintenance budgets yet is denying funding to correct reported deficiencies in a manageable timeframe.

An example of this issue is packaged air conditioning units on large buildings. One facility has 150 package units in the newest section. The refrigerant for these package units is 410A. The facility cannot afford to replace 150 units out of the operating budget, nor do they have the staffing model to support such a drastic change within the time limits of this WAC. The capital budget should support a maintenance dilemma of this magnitude. Each package unit is approximately \$30,000. The replacement of these units would cost the facility \$4,500,000. This cost does not include contracting fees. A contractor could reasonably install these units for approximately \$7,000,000. This cost would take 13% of the proposed capital budget for this cycle, and only fix one facility.

I recommend a state level committee be formed to look at the opportunities for phasing projects through funding, design build, and installation with stakeholders that understand the impacts at the facility level. This would give key insight to lawmakers and legislators on critical component replacement, timeframes, and budgeting forecasts. This would give legislators an information package to make informed decisions about state-run facilities and develop realistic replacement timelines that fit within the state budget. Maintenance department heads should take part of this process.