



DAIKIN U.S. CORPORATION
1700 Pennsylvania Avenue, Suite 550
Washington, DC 20006

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

February 10, 2025

(Submitted via e-mail only to <https://aq.ecology.commentinput.com?id=tH6Ch8VWA>)

RE: Comments on Washington State Department of Ecology's Informal Draft of Proposed Changes to Chapter 173-443 WAC Hydrofluorocarbons (HFCs) and Other Fluorinated Greenhouse Gases

Daikin U.S. Corporation (Daikin) is pleased to provide comments on the draft proposed amendments to Chapter 173-443 WAC Hydrofluorocarbons (HFCs) and Other Fluorinated Greenhouse Gases that Washington State's Department of Ecology (Ecology) published on January 16, 2025.

The Daikin Group of companies, and their more than 20,000 U.S. employees, are strong proponents of the phasedown of HFCs. We support the goals set forward by Congress in the AIM Act and in the subsequent ratification of the Kigali Amendment to the Montreal Protocol. We have supported EPA's implementation of the AIM Act through engagement and feedback on its Allocation Rules under subsection (e)¹, the Technology Transitions and Sector-Based Restrictions Rules under subsection (i)^{2,3,4}, and the Reclamation and Leak Reduction Rule under subsection (h)⁵.

As explained in our initial comments submitted on January 10, 2025, Daikin shares Ecology's goal to achieve its emissions reduction targets and to revise Chapter 173-443 WAC to streamline implementation of the statute. Daikin appreciates Ecology's practical approach to aligning Chapter 173-443 WAC with CARB and EPA, and Ecology's

¹ Phasedown of Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program Under the American Innovation and Manufacturing Act, 86 Fed. Reg. 55116-55222 (October 5, 2021)

² Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons Under the American Innovation and Manufacturing Act of 2020, 88 Fed. Reg. 73098-73212 (October 24, 2023)

³ Phasedown of Hydrofluorocarbons: Technology Transitions Program Residential and Light Commercial Air Conditioning and Heat Pump Subsector, 88 Fed. Reg. 88825-88832 (December 26, 2023)

⁴ Phasedown of Hydrofluorocarbons: Restrictions on the Use of HFCs Under the AIM Act in Variable Refrigerant Flow Air Conditioning Subsector, 89 Fed. Reg. 100381-100392 (December 12, 2024)

⁵ Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020, 89 Fed. Reg. 82682-82872 (October 11, 2024)

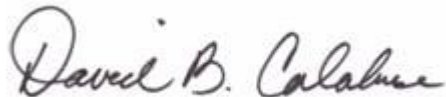
responsiveness to our initial feedback on the variable refrigerant flow (VRF) installation period (sell-through).

Daikin supports the proposed 2-year timeframe for installation of new air conditioning (AC) and VRF equipment manufactured prior to the effective dates listed in WAC 173-443-040, Table 3. These clarified sell-through provisions reduce concerns regarding potential disruption to planned and ongoing projects in the state, economic impacts resulting from delays or loss of these projects, and potential job losses resulting from market and manufacturing slowdowns. We strongly encourage Ecology to maintain the proposed AC and VRF provisions that effectively align Washington state's compliance dates with those already established by EPA and CARB.

While the proposed language, when adopted, will reduce the project and economic concerns discussed above, we maintain that clear guidance from Ecology is still necessary to fully alleviate these concerns. Due to the potential overlap between the publication of the final rule in late 2025 and the existing January 1, 2026, VRF compliance date, we reemphasize our request for Ecology to provide clear advance notice of its intent to align with EPA by April 1, 2025. This advance notice would address regulatory uncertainties that will arise as the compliance date draws near, and minimize any associated market and economic impacts.

Daikin appreciates the opportunity to provide comments on the proposed amendments. We are available to address any questions or to provide more detailed information.

Sincerely,

A handwritten signature in cursive script that reads "David B. Calabrese".

David B. Calabrese
Daikin U.S. Corporation Washington, DC Office
Senior Vice President, Government Affairs
Deputy General Manager