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Department of Ecology
Climate Pollution Reduction Program
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July 10, 2025

(Submitted via e-mail only to <https://ecology.commentinput.com/?id=Gd7ePVHhc>)

RE: Comments on Washington State Department of Ecology's 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 proposed amendments to Chapter 173-443 WAC Hydrofluorocarbons (HFCs) and Other Fluorinated Greenhouse Gases that Washington State's Department of Ecology (Ecology) published on May 20, 2025.

The Daikin Group of companies, and our 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. The Daikin Group companies are actively transitioning product lines to use lower GWP refrigerants that meet or exceed the requirements of both federal and state regulations.

Daikin appreciates Ecology's responsiveness to stakeholder feedback, the efforts taken to clarify the rule language, and the improved consistency with regulations in other jurisdictions. We anticipate that the proposed changes will streamline implementation of the statute, significantly reduce compliance burdens for manufacturers, and resolve market uncertainty in the state. Daikin appreciates the interpretive statement that Ecology issued in April 2025, and the reassurance it provided to consumers on Ecology's intent to resolve sell-through discrepancies between Washington state and EPA.

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)

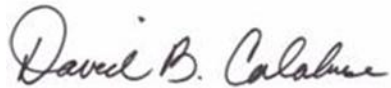
⁵ Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020, 89 Fed. Reg. 82682-82872 (October 11, 2024)

Daikin supports the proposed 2-year timeframe for installation of new air conditioning (AC) and Variable Refrigerant Flow (VRF) equipment manufactured prior to the effective dates listed in WAC 173-443-040, Table 3 and the proposed 2-year timeframe for installation of new chillers used for data centers and industrial process refrigeration manufactured prior to the effective dates listed in WAC 173-443-040, Table 2. 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 the Department of Ecology to maintain the proposed amended provisions for AC, VRF, and chillers that effectively align Washington state's compliance dates with those already established by EPA and CARB.

With the previously issued interpretive statement, and the publication of the proposed language as written, we believe that potential project and economic concerns discussed above will be fully addressed.

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 dark ink, reading "David B. Calabrese". The signature is fluid and cursive, with the first name "David" and last name "Calabrese" clearly legible.

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