

Steve Acselrod

Please see attached letter.

To: Washington State Department of Ecology

Sabey Corporation appreciates Ecology's efforts to reduce refrigerant emissions under HB 1050 and supports aligning program costs with environmental impact. As a Washington-based real estate developer and data center owner-operator, we manage multiple medium and large refrigeration systems, including five large (~1,500 lb.) chillers at our Quincy data center campus.

In 2025, Sabey paid \$520 for one large chiller (initial registration + annual fee) and faces significant new costs from inspections, maintenance, and administration. We support the intention of Ecology's proposed changes but urge the Department to consider these added cost burdens for companies in Washington state working to comply with the updated regulations. In that vein, we ask that the Department of Ecology consider the recommendations below while formulating the program fee requirements for 2026:

1. Scale fees by actual risk and performance

- a. We support adding a CO₂e-based component but encourage the Department to reduce rates or offer credits for facilities with verified low leakage and use of reclaimed refrigerant.
- b. Provide temporary fee reductions for facilities transitioning to low-GWP refrigerants.
- c. Allow enterprise-level registration for multi-site operators to streamline administration.

2. Avoid duplicative compliance

- a. Align RMP reporting formats, definitions, and timelines with EPA 608, GreenChill, and local programs.
 - i. HB 1050 directs Ecology to align recordkeeping and reporting with U.S. EPA programs "to the maximum extent practicable" and to apply leak rates and thresholds reflecting EPA GreenChill's superior performance levels. Sabey requests that RMP adopt EPA Section 608's leak-rate formula, thresholds, repair timelines, and recordkeeping fields, and accept a single report format consistent with EPA 608/GreenChill inventory and leak-rate metrics. Matching RMP's annual reporting cycle to the federal/GreenChill schedule would allow one dataset and timeline to satisfy state, federal, and voluntary requirements, reducing duplication while preserving program integrity.

3. Increase transparency on fee use

- a. Publish annual budget vs. actuals, staffing levels, inspection outputs, and leakage reduction metrics.
- b. Clarify application of the per-facility fee cap for multi-building campuses.

4. Phase implementation for new sectors

- a. With data-center-specific HFC rules deferred until 2027, apply phased enforcement and provide targeted technical assistance for medium-facility registrants.

Conclusion

Sabey supports the program's goals but urges the Department of Ecology to adopt a 2026 fee structure that reflects performance, harmonizes requirements, ensures transparency, and eases implementation for critical infrastructure. These changes will improve cost-effectiveness while maintaining strong environmental outcomes.

Respectfully,

Steve Acselrod
Safety Director