

July 20, 2021

Ms. Kimberly Goetz  
HWTR Legislative Coordinator  
Department of Ecology  
Kimberly.Goetz@ecy.wa.gov

*Via email only*

**Re: House Bill 1050 (2020)**

**HFC End-Of-Life Management Program**

These comments offered to the Washington State Department of Ecology (Department) on managing HFCs and refrigerants at end-of-life are submitted on behalf of the Washington State Association of the United Association of the Plumbing and Pipefitting Industry (WSA) and the Mechanical Contractors Association of Western Washington (MCA). WSA has just under 9,000 members. MCA represents approximately 100 mechanical contractors who employ much of this union workforce.

Together, we install and perform work on a vast infrastructure of industrial, commercial and residential systems for heating, cooling and refrigeration that involve millions of pounds of refrigerants and thousands of highly-skilled individuals with expert knowledge about these systems and the overall industry. We are distinctly aware of the hazardous potential for HFCs and regard ourselves as stewards of our environment through our efforts to responsibly handle and manage these refrigerants in our daily work. Both the WSA and MCA contributed to language in the final version of House Bill 1050 (2021), and we appreciate the Department's stakeholdering efforts thus far in this matter.

The heating, ventilation, air conditioning, and refrigeration (HVAC/R) industry is a complex and training-intensive industry. The prevalence of volatile, potentially lethal gases persists throughout our daily work. In response to climate change, the HVAC/R industry has begun the search for refrigerants with lower global warming potential (GWP). Most of the refrigerants that have been found effective fall into one of two categories: A2L or A3, Semi-Flammable or Flammable. These new lower GWP refrigerants introduce new hazards through their installation and operation and represent added risk for HVAC/R workers, businesses, building owners, the public, and the environment.

For decades, the HVAC/R industry has been learning and evolving to improve the management and safe use of refrigerant products. Currently, the federal EPA does the bulk of regulation for refrigerants, with a range of licenses that are required based on the type of HVAC/R work being performed by an individual or contractor. However, because the industry is so large and EPA resources are limited, enforcement of the regulations is minimal and unscrupulous actors can improperly dispose of refrigerant without repercussions. Also, the EPA license does not require a renewal or continuous training to stay current with procedures. While the EPA has some oversight but with limitations, the City of Seattle has implemented its own refrigeration journeyman license and refrigeration contractor licenses.

As leaders in the industry that have successfully handled millions of pounds of refrigerants, we can assure the Department that there are currently means and methods available to install, recover, recycle, store, and dispose of refrigerant accurately and safely. The use of proprietary software programs to track refrigerant, as well as the use of software that is readily available for purchase have been very

successful in tracking contractor refrigerant inventories, use, and end user quantities. Additionally, constant training and certification on the proper handling of refrigerants and recovery/recycle processes are critical in protecting the environment. It is our belief that the incorporation of a statewide license, modeled after the City of Seattle refrigeration journeyman license would greatly improve compliance with new and existing regulations, provides more certainty for contractors and safety assurances for the public, and fits within the scope of the recommendations being sought by HB 1050.

The HVAC/R industry is very dynamic. New refrigerants, equipment, and installation techniques are all part of the ever-changing landscape. The implementation of the new lower GWP refrigerants brings a series of challenges, as well as opportunities to improve the management of refrigerant moving forward. The appropriate application of refrigerant tracking, coupled with a statewide license for individuals performing work with refrigerants will help the State of Washington successfully implement HB 1050 in a safe and effective manner.

Please let us know if you have any questions. Otherwise, thank you for your careful consideration of our written comments.

Respectfully Submitted,

**Mechanical Contractors Association  
Of Western Washington**



Scott Middleton  
General Counsel &  
Government Affairs Director  
(206) 442-9029  
[smiddleton@mcaww.net](mailto:smiddleton@mcaww.net)

**Washington State Association of the  
United Association of UA Pipetrades**



Tim Herbert  
Executive Secretary-Treasurer  
(206) 707-2936  
[Tim@washingtonpipetrades.org](mailto:Tim@washingtonpipetrades.org)