

Washington State’s Proposed Regulations: Refrigerant Management Program Fact Sheet* for Supermarket End-Users (Commercial HVACR)

Applies To:

- Facility owner/operators with at least one HVACR system with full charge of 50+ lbs. of a high-GWP refrigerant (150+ GWP).

Especially Noteworthy:

- The program applies to air-conditioning equipment in addition to refrigeration.
- Does not apply to HVACR systems with full charges of <50 lbs.
- Registration/reporting fees charged per system; total annual fees much higher than other programs.
- Systems exceeding certain 12-month rolling average leak rates must be reported to Ecology within 30 days.
- Recordkeeping requirements above and beyond current federal requirements (refrigerant purchases, refrigerant stored at facilities, shipments for reclaim or destruction).

Recordkeeping

- Required recordkeeping starts 1/1/24 for facilities with at least one regulated system. Must keep records for 5 years.
- Recordkeeping requirements above and beyond current federal requirements.

Reporting Requirements and Fees

- Registration required for facilities with at least one HVACR system with the following charge sizes by the dates in the table below. Annual reporting thereafter. Fees are charged PER SYSTEM.

System Full Charge Size	Registration Deadline	Initial Implementation Fee	Annual Implementation Fee
≥ 1500 lbs. (large)	03/15/24	\$150	\$370
200 ≤ 1499 lbs. (medium)	03/15/26	None	\$170
50 ≤ 199 lbs. (small)	03/15/28	None	None

Leak Repair Requirements

- Starting 1/1/24, all leaks must be repaired within 14 days of detection, including all verification tests. If verification tests fail, 14-day extension to complete the repair is given. If leak still can’t be repaired, system must be retired (though proposed regulations allow for retrofits, the retrofit refrigerant must have a GWP <150 and there currently aren’t any). Retirement plan must be submitted within 90 days of repair failure and completed within 6 months. Mothballing stops the clock.
- Systems that exceed the following leak rate thresholds must be reported to Ecology within 30 days.

End Use	Leak Rate Threshold
Commercial or Retail Refrigeration	16%
Air Conditioning	8%

- Leak rate must be calculated using Washington’s 12-month rolling average method each time a leak inspection is conducted and each time refrigerant is added to the system (lbs. of refrigerant added over past 365 days/full charge size x 100)

Mandatory Whole System Leak Inspections

- Required starting 1/1/24.

System Full Charge Size	Frequency of Leak Inspections ¹
≥ 1500 lbs. (large)	Monthly
200 ≤ 1499 lbs. (medium)	Every 3 months
50 ≤ 199 lbs. (small)	Yearly

¹ Portions of systems enclosed in a building and continuously monitored by an annually audited/calibrated ALDS are exempt.

- Must be conducted after the leak is repaired, as part of both the initial and follow-up verification tests.
- Must be conducted each time refrigerant is added to a system.
- Must be conducted within 24 hours of receiving an alert from an automatic leak detection system.
- Must be conducted each time oil residue is observed on any refrigerant circuit component.

Mandatory Automatic Leak Detection Systems (ALDS)

- ALDS required for systems with full charges of 1500+ lbs. starting on 1/1/25.

*This fact sheet is a summary of very complex and lengthy proposed regulations. It focuses on HVACR equipment most commonly found in supermarkets. This fact sheet is provided to help supermarket end-users prepare for and participate in the upcoming WA State Public Hearing on 8/24/23 and is not meant to be a substitute for reading the regulatory text.