

Refrigerant Management Program fee for 2026

Final workload analysis, estimated budget, and annual fee

Introduction

Ecology sets a yearly implementation fee for Refrigerant Management Program registrants who have equipment with more than 200 pounds of refrigerants with a global warming potential greater than 150 (WAC 173-443-135). This fee helps cover the costs of running the program. Under WAC 173-455-160, Ecology may adjust the fee yearly to cover projected program costs and to maintain sufficient funds. Because revenues will not support projected program costs, Ecology must adjust fees to increase revenues.

In order to adjust the fee, Ecology must:

- **Post a draft workload analysis for 2026, annual budget, and proposed fee change** on Ecology's website by August 1, 2025 (this document)
- **Provide 30 days for public comment**
- **Post the final workload analysis, budget, and fees** by December 1, 2025

Final workload analysis

A core team of staff work full-time to run the Refrigerant Management Program within the Fluorinated Gases Section (Table 1). Other staff from the Climate Pollution Reduction Program provide administrative support.

Planned staff positions for the Refrigerant Management Program

Position title	Job classification	Number of positions - FTE	2026 FTE covered by RMP fees	Portion covered by other sources for 2026	Notes
Fluorinated Gases Section Manager	WMS Band 2	1	0.0	1.0	Previously 30% funded through the Refrigerant Management Program; to be temporarily covered using other funds.
Statewide Expert	Environmental Specialist 5	1	0.0	1.0	
Regional Lead Inspectors	Environmental Specialist 4	4	4.0	0.0	
Regional Inspectors	Environmental Specialist 3	8.5	1.5	1.5	Remaining positions on hold with recruitment delayed until calendar year 2027.
Outreach Specialist	Community Outreach & Environmental Education Specialist 4	0.5	0.5	0.0	
Outreach Specialist	Community Outreach & Environmental Education Specialist 3	1	1.0	0.0	
Administration Support	Fiscal Analyst 2 & IT App Developer	1.58	1.05	0.53	
Total for 2026		12.08	8.05	4.03	

Table 1: Planned staff positions, based on full time equivalents (FTE), for the Refrigerant Management Program. This table outlines the job titles, classifications, number of positions, and notes on funding or hiring timelines. Some positions are currently on hold or temporarily funded through other sources.

Planned staff increases for 2026

Starting in 2026, we will phase in new staff to support facilities with medium-sized equipment (refrigerant charge between 200 and 1499 pounds), which are required to register in the program for the first time.

- We plan to hire two Environmental Specialist 3 (ES3) positions during the first and fourth quarters of 2026.
- These staff will provide outreach and technical assistance to medium-sized facilities registering beginning in 2026.
- We plan to delay hiring additional ES3 positions until 2027.

Estimated annual budget

The program's fees follow the calendar year. We will send invoices after the March 15 registration deadline, and participants must pay the fee within 30 days of receiving the invoice. We plan our budget by fiscal year, which starts on July 1 each year. The budget covers staff and other costs to run the program and meet legal requirements. **Between January 1, 2024, and June 30, 2025, Ecology has collected $52,910** in fees from registered entities with a large refrigerant charge (above 1500 pounds). Even projecting an estimated revenue of over $600,000 in potential medium-sized registrants, this will not cover the program's annual estimated operating costs for 2026 of $1,109,696 (Table 2).

Estimated 2026 budget for program implementation

Budget item	FTE	Total cost
Direct staffing costs	12.08	$1,244,117
Goods and services		$63,796
Travel		$55,179
Equipment		$11,277
Total other costs		$361,157
Total estimated budget for program implementation in 2026		**$1,735,526**
Ecology staffing covered by other fund sources		**$625,830**
Costs to be covered through RMP fees		**$1,109,696**

Table 2: Breakdown of estimated Ecology staffing and other costs for implementing the Refrigerant Management Program in 2026. This includes staffing temporarily covered using other funds.

Established fees for 2026

In 2026, **medium entities will pay a $170 participation fee**, as required by rule. This amount is unchanged. **For large facilities, Ecology will charge a $250 base fee plus $0.15 per metric ton of carbon dioxide equivalent** (MT CO_2e) of total refrigerant capacity of their facility, **with a cap of $5,000 per facility.**

$$Large\ fee\ =\ base\ fee\ +\ ((pounds\ of\ refrigerant\ \times\ refrigerant\ GWP\ \div\ 2{,}204.62)\ \times\ \$0.15)$$

This formula calculates the large fee by adding the base fee to the product of the number of pounds of refrigerant, its global warming potential (GWP), and $0.15. That product is then divided by 2,204.62, which converts pounds to metric tons.

For example, a facility with a 2,000-lb chiller using R-134a refrigerant (GWP = 1,430) would be charged:

- **Base fee**: $250
- **Carbon fee** (MT CO2e): ~$195
- **Total**: $445.

Based on current RMP registrations, fees under this structure will range from under $370 up to the cap of $5,000 per facility**.** With this change, projected revenues for calendar year 2026 (Table 3) better align with program costs. We will reassess the program budget in subsequent years and may adjust fees up or down to continue to align revenues and expenses.

Projected revenues for calendar year 2026

Category	Description	Estimated amount
Large facility fees	Includes a $250 base fee + $0.15 per metric ton CO_2e, capped at $5,000 per facility	$164,446
Known medium facilities	Fees from 1,262 already identified medium-sized facilities	$214,540
Projected medium facilities	Fees from an estimated 2,372 additional medium facilities are expected to register by the end of 2025	$403,325
One-time fund transfer	Internal Ecology transfer to support the program in 2026 only	$462,000
Total projected revenue	Assumes 10% delayed payment rate across all participants	$1,119,879

Table 3: This table breaks down estimated income from large and medium facility fees, along with a one-time internal fund transfer. The total assumes a 10% non-payment rate across all participants.

Notes

- **Large facility fee**: Revenue depends on the number of large facilities that register.
- **Projected medium facility estimate**: Based on registration trends from January–May 2025, continuing through Dec 2025.
- **One-time transfer**: Ecology will offset this $468,000 transfer in future years by adding a carbon fee for medium facilities.
- **Total projected revenue** is based on estimated medium and large facility participation and is subject to change.

Clarifications on fees due to public comments received

Ecology received two public comments during the comment period. One commenter noted that registration fees may not account for seasonal use patterns of refrigeration equipment. To clarify, under WAC 173-443-185, RMP registered entities must submit annual reports each year. In calculating fees for large equipment in 2026, Ecology will pro-rate a registered entity's fee based upon the pro-rated amount of time equipment was reported as mothballed, as defined in WAC 173-443-030, during 2025. For example, if a facility operating a single large piece of equipment reported the equipment as mothballed for three (3) months during 2025, the facility's 2026 fee would be reduced by 25%.

Questions
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Accesibility
To request an ADA accommodation, contact Ecology by phone at 360-407-6800 or email at HFC@ecy.wa.gov, or https://ecology.wa.gov/accessibility. For Relay Service or TTY call 711 or 877-833-6347.