

# Refrigerant Management Program fee for 2027

## 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 maintain sufficient capital reserves. Because revenues from existing registrations will not support continued projected program costs, Ecology must adjust fees to increase revenues.

In order to adjust the fee, Ecology must:

- **Post a draft workload analysis for 2027, annual budget, and proposed fee change** on Ecology's website by August 1, 2026 (this document)
- **Provide 30 days for public comment**
- **Post the final workload analysis, budget, and fees** by December 1, 2026

## Final workload analysis

A core team of staff work 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 | 2027 FTE covered by RMP fees | Notes |
|---|---|---|---|---|
| Fluorinated Gases Section Manager | WMS Band 2 | 1.0 | 0.75 | |
| Statewide Expert | Environmental Specialist 5 | 1.0 | 0.0 | RMP-related work to be covered by other fund sources for 2027. |
| Regional Lead Inspectors | Environmental Specialist 4 | 4.0 | 4.0 | |
| Regional Inspectors | Environmental Specialist 3 | 8.5 | 1.5 | Multiple positions on hold; recruitment delayed until calendar year 2027 or later. |
| Outreach Specialist | Community Outreach & Environmental Education Specialist 4 | 0.5 | 0.5 | |
| Outreach Specialist | Community Outreach & Environmental Education Specialist 3 | 1.0 | 1.0 | |
| Administration Support | Fiscal Analyst 2 & IT App Developer | 1.58 | 1.16 | |
| **Total for 2026** | | **13.08** | **8.91** | |

*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 2027

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, starting in 2026, we will phase in new staff.

- We plan to hire one Environmental Specialist 3 (ES3) position during the fourth quarter of 2026.
- This staff will provide outreach and technical assistance in the Northwest Region where an increased proportion of medium-sized facilities exist.
- We plan to delay hiring additional ES3 positions until 2027. As more medium-sized facilities register and RMP revenue allow, additional ES-3 positions will be hired to support other regions.

## Estimated annual budget

The program's fees follow the calendar year. We 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, 2026, and June 30, 2026, Ecology has billed $717,629.00** in fees from registered entities with a large refrigerant charge (above 1500 pounds). Ecology must also maintain a working capital reserve; with a goal of achieving a 9-month reserve. For 2027, Ecology will establish a 4-month working capital reserve with the goal to achieving the 9-month reserve over time. Even projecting potential additional medium-sized registrations throughout the remainder of the year, revenues will not cover the program's annual estimated operating costs for 2027 of $1,379,158 (Table 2).

### Estimated 2026 budget for program implementation

| Budget item | FTE | Total cost |
|---|---|---|
| Direct staffing costs | 8.91 | $926,551 |
| Goods and services | | $123,388 |
| Travel | | $53,585 |
| Equipment | | $8,324 |
| Total other costs | | $283,208 |
| **Costs to be covered through RMP fees** | | **$1,379,158** |

*Table 2: Breakdown of estimated Ecology staffing and other costs for implementing the Refrigerant Management Program in 2027. Other costs include Attorney General Office support, translation services, and other operational costs.*

## Established fees for 2027

For 2027, Ecology will maintain the $250 base fee for large facilities and will charge medium entities a $100 base fee. Ecology will then add a $0.45 per metric ton of carbon dioxide equivalent (MT $CO_2e$) of total refrigerant capacity fee for each facilities equipment. Ecology will maintain a cap of $5,000 per facility.

$$RMP\ fee\ =\ base\ fee\ +\ ((pounds\ of\ refrigerant\ \times\ refrigerant\ GWP\ \div\ 2{,}204.62)\ \times\ \$0.45)$$

This formula calculates the fee by adding the base fee to the product of the number of pounds of refrigerant, its global warming potential (GWP), and $0.45. 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): $584
- **Total**: $834

In calculating fees, Ecology will pro-rate fees based upon the pro-rated amount of time equipment was reported as mothballed, as defined in WAC 173-443-030, during 2026.

Based on current RMP registrations, fees under this proposal will range from $154 up to the cap of $5,000 per facility**.** With this change, projected revenues for calendar year 2027 (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 2027

| Category | Description | Estimated amount |
|---|---|---|
| Large facility fees | Includes a $250 base fee + $0.45 per metric ton $CO_2e$ fee, capped at $5,000 per facility | $409,384 |
| Known medium facilities | Includes a $100 base fee + $0.45 per metric ton $CO_2e$ fee, capped at $5,000 per facility | $1,208,614 |
| Projected medium facilities | Estimated fees from roughly 225 additional medium facilities expected to register by the end of 2026 | $150,000 |
| Total projected revenue | Assumes 10% delayed payment rate across all participants | $1,591,198 |

*Table 3: This table breaks down estimated income from large and medium facility fees. The total assumes a 10% delayed-payment rate. Note: Per WAC 173-443-135, non-payment constitutes a distinct violation of state law.*

### Notes

- **Large facility fee**: Revenue depends on the number of large facilities that register.
- **Medium facility fee**: Based on registration through May 18, 2026, when RMP fee budget updating began .
- **Projected medium facilities**: Projected additional medium facilities added from May 19, 2026 through December 31, 2026.
- **Total projected revenue** is based on estimated medium and large facility participation and is subject to change.

## Public comments received

Ecology received one public comment stating they would pay the new fee but did not support the purpose of the program, in general.


### Questions

**HFC Team**

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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.