



National Tribal
AIR ASSOCIATION

November 7, 2025

Honorable Lee M. Zeldin
Administrator
Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Phasedown of Hydrofluorocarbons: Reconsideration of Certain Regulatory Requirements Promulgated Under the Technology Transitions Provisions of the American Innovation and Manufacturing Act of 2020. Docket number EPA-HQ-OAR-2025-0005; FRL-12166-01-OAR.

Dear Administrator Zeldin,

The National Tribal Air Association (NTAA) submits this letter regarding the U.S. Environmental Protection Agency's (EPA's) proposed rule entitled Phasedown of Hydrofluorocarbons: Reconsideration of Certain Regulatory Requirements Promulgated Under the Technology Transitions Provisions of the American Innovation and Manufacturing Act of 2020. Docket number EPA-HQ-OAR-2025-0005; FRL-12166-01-OAR.

The NTAA is a member-based organization with 161 Member Tribes. The organization's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaskan Natives. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important to understand that interactions with the organization do not substitute for Nation-to-Nation consultation, which can only be achieved through direct communications between the federal government and American Indian Tribal Governments and Alaskan Natives.

The NTAA disagrees with EPA's proposed reconsiderations of the requirements for provisions of the requirements of the Hydrofluorocarbons (HFC) phase requirements for the following sources:

- **Refrigeration:** The rule would delay the Global Warming Potential (GWP) limits for new retail food and remote condensing units, changing the start date from 2027 to 2032 and increasing the GWP limit from 150/300 to 1,400.

- **Cold Storage:** The GWP limit for new cold storage warehouses would change from 150/300 to 700, and the start date would be delayed from 2026 to 2032.
- **Air Conditioning and Heat Pumps:** The 2026 deadline for installing R-410A equipment manufactured or imported before January 1, 2025, has been removed. The proposal also addresses specific issues for variable refrigerant flow (VRF) systems.
- **Industrial Processes and Chillers:** The compliance dates for certain industrial process refrigeration equipment, including those for semiconductor manufacturing and certain chillers, would be delayed from 2026/2028 to 2030.
- **Intermodal Transport:** The rule proposes to exempt equipment designed to operate below -35°C and makes other adjustments for intermodal refrigerated transport.

The NTAA would like to remind the EPA that the AIM Act which authorized these requirements was passed by Congress in a bipartisan measure, and it was supported by industry because many of the sources were able to comply with the Act. The NTAA also believes that reconsidering these requirements, may result in the United States being noncompliant with the Kigali Amendment to the Montreal Protocol. More importantly, given one pound of HFC-134a is equivalent to more than 1,500 pounds of Carbon Dioxide in global warming potential, any delay in the reduction of these harmful chemicals has a significant impact on public health and the environment.

In closing, the NTAA looks forward to continuing to work with EPA in protecting growing Tribal economies as well as public health and air quality resources for American Indian Tribes and Alaskan Natives. However, NTAA has serious concerns about the environmental impact of reconsidering the HFC requirements. If you have any questions or would like additional information please contact Miranda O'Neill, NTAA Program Manager, Miranda.ONeill@nau.edu.

Respectfully,

Syndi Smallwood

Syndi Smallwood
Chair
National Tribal Air Association

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