



April 21, 2026

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

**Re: Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82,682 (Oct. 11, 2024), codified at 40 C.F.R. Part 84, Subpart C**

Dear Administrator Zeldin:

Pursuant to the Administrative Procedure Act (“APA”),<sup>1</sup> the Clean Air Act (“CAA” or “the Act”),<sup>2</sup> and other relevant regulations and practices, Carrier Global Corporation (“Carrier”) hereby petitions the U.S. Environmental Protection Agency (“EPA” or “the Agency”) to initiate a rule-making proceeding to revise certain provisions of the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82,682 (Oct. 11, 2024), codified at 40 C.F.R. pt. 84, subpt. C (the “Rule”).

Through what appears to be an inadvertent oversight, the EPA has regulated hundreds of thousands of road and intermodal transportation refrigeration units (“TRUs”) under this Rule. Both the EPA proposed and final rulemaking documents indicate that the EPA did not intend to regulate TRUs under the Rule because it assumed that the refrigerant capacity of these units would all be under the adopted fifteen-pound refrigerant applicability threshold. These units represent approximately 70% of all TRUs on the road today. In reality, some 360,000 road TRUs contain between fifteen and eighteen pounds of refrigerant at full charge. Because the EPA did not consider the costs of regulating these sources—which Carrier estimates to be at least \$333 million annually and at least \$5.8 billion in present value costs—the EPA should undertake a narrow rulemaking to assess whether it was justified in having included several hundred thousand additional TRUs

---

<sup>1</sup> See 5 U.S.C. § 553(e); *Oljato Chapter of Navajo Tribe v. Train*, 515 F.2d 654, 666 (D.C. Cir. 1975) (recognizing that “[t]he right to petition” the EPA “for revision of a rule is . . . available under the APA”).

<sup>2</sup> See 42 U.S.C. § 7401, *et seq.* See *id.* § 7601(a)(1) (“The Administrator is authorized to prescribe such regulations as are necessary to carry out his functions under this chapter.”).

currently subject to the Rule. Specifically, the EPA should consider whether to amend § 84.106 to: (1) specifically exempt TRUs; or (2) raise the applicability threshold to thirty or more pounds of refrigerant at full charge.

Carrier is a global leader in intelligent climate and energy solutions, focused on providing differentiated, digitally enabled lifecycle solutions to our customers. Our portfolio of brands offers innovative heating, cooling, and cold chain solutions to enhance the lives we live and the world we share. Our Climate Solutions Transportation business segment provides climate and energy solutions for customers globally. For more than 50 years, our products, services, systems, and monitoring solutions have offered reliable transport and preservation of food, medicine, and other perishable cargo. Our products include energy-efficient and environmentally sustainable trucks, trailers, shipping containers, and intermodal applications to meet customer needs for both ground transport and ocean freight, while services include maintenance, repair, and monitoring. We are one of the largest manufacturers of TRUs for the United States market.

The ultimate users of our products include the invaluable companies that bring life-altering medicines to those in need while maintaining the necessary temperatures to keep them effective. They are the trucking fleets that make it possible for fresh produce and meat to make it from hard-working farmers and ranchers to the shelves of local grocery stores for American consumers. Simply put, U.S. road and intermodal TRUs are essential appliances that make modern life possible by precisely controlling the temperature of food and pharmaceutical cargo in trucks and intermodal shipping containers. We know this Administration shares our commitment to all parts of this important value chain, and we hope we can agree on a common-sense solution to what appears to be an inadvertent mistake by the prior administration's EPA.

## **I. Background**

On October 11, 2024, the EPA promulgated the Rule, which imposes leak detection and repair ("LDAR") obligations on "refrigerant-containing appliances with a full charge of 15 or more pounds of refrigerant," effective January 1, 2026. *See* 40 C.F.R. § 84.106(a)(4).

Carrier estimates that around 360,000 road TRUs in the United States currently contain between fifteen and eighteen pounds of hydrofluorocarbon ("HFC") refrigerant at full charge. Based on the rulemaking documents, it appears that the EPA assumed all TRUs fell below the fifteen-pound threshold and therefore would not be regulated by this provision. For example, in the final Regulatory Impacts Analysis ("RIA") for the Rule, the EPA assessed the potential incremental costs of various appliance categories. *See* EPA, Regulatory Impact Analysis Addendum: Analysis of the Economic Impact and Benefits of the Final Rule: Management of Certain Hydrofluorocarbons and Substitutes Under Subsection (h) of the American Innovation and Manufacturing Act of 2020 at 33 (Sept. 2024), EPA-HQ-OAR-2022-0606-0175 [hereinafter "RIA"]. Likewise, Table 3-10 to the RIA explicitly notes that the EPA did not assess potential incremental costs for road/intermodal TRUs because all three considered size classes fell below the fifteen-pound applicability threshold. *See id.* at 36 (identifying road/intermodal TRUs with "low," "average," and "high" amounts of refrigerant as exempt from LDAR requirements); *id.* at 84 (defining these amounts as five, ten, and fifteen pounds, respectively). *See also id.* at 101-02 (excluding all road/intermodal TRUs, regardless of size, from the compliance cost assessment).

Even after the Rule was finalized, the EPA has released recent public statements indicating that it did not believe TRUs would be subject to the Rule. For example, in January 2026, the EPA issued an FAQ document stating that, “[f]or the purposes of 40 CFR 84.106, *consistent with EPA’s regulatory impact analysis supporting the 2024 final rule, EPA generally presumes road and intermodal TRUs have a charge size of 15 pounds or less and intends to implement this provision consistent with this presumption.*” *Frequent Questions on the Phasedown of Hydrofluorocarbons*, EPA (emphases added), <https://perma.cc/55VX-5UZM> (last updated Apr. 2, 2026).

In contrast to the EPA’s cost assessment, as mentioned above, Carrier estimates that approximately 360,000 road (trailer) TRUs in the United States contain between fifteen and eighteen pounds of HFC refrigerant—a significant population of appliances that were not considered in the rulemaking, and for which regulatory impacts and compliance costs were not taken into account.

If the EPA had accounted for these 360,000 road TRUs, the Agency would have recognized staggering compliance costs, with at least \$333 million in annual costs based on the conservative cost estimates performed by Carrier. *See* Table 1, below. Using the EPA’s 3% discount rate for benefits assessments, *see* RIA at 66, and a twenty-five-year cost horizon, *see id.* at 9, the present value of these costs exceeds \$5.8 billion. These estimates are conservative because they exclude additional costs for intermodal TRUs in the same size range and other potential costs, but until the EPA undertakes a rulemaking to internally assess and seek comment, the full cost of this oversight cannot be fully known. Ultimately, these burdensome expenses will be passed on directly to consumers, inflating prices for essential food and medicines transported using these units.

**Table 1: Estimated Annual Nominal Costs for Road TRUs in the 15- to 18-pound Range**

Cost Element	Number of Units (A)	Duration of Cost (B)	Cost Rate (C)	Nominal Annual Cost (A × B × C)
Refrigerant monitoring and recordkeeping during semi-annual routine TRU maintenance and recharging	360,000	1.5 hours	\$150/hour (labor) <sup>a</sup>	\$81 MM
Monthly refrigerant monitoring	360,000	1 hour	\$100/hour (labor) <sup>b</sup>	\$36 MM
LDAR inspection for TRUs above 10% leak rate	288,000 <sup>c</sup>	4 hours	\$150/hour (labor)	\$172.8 MM
Equipment downtime	288,000	2 days	\$75/day (replacement equipment rental) <sup>d</sup>	\$43.2 MM
<b>TOTAL</b>				<b>\$333 MM</b>

- |   |  |
|---|--|
| a | \$150 is the nominal maintenance rate; market rates are likely higher. Historically this required 10 minutes of activity, but the precision of measurement required by the Rule would require an additional hour per visit, as the technicians would be required to record a very exact amount of refrigerant into a tracking system of some form. This figure does not account for whether technicians have equipment available that can measure with the precision required by the Rule.                                       |
| b | This accounts for the time that will have to be spent checking the filings of each unit each month to identify any unit that is near triggering the limit, conservatively totaling to an hour over the course of the year. Carrier used a lower hourly labor rate for this less skilled operation.   |
| c | The EPA assumed that 80% of appliances in similar service and of a comparable size would leak 10% of refrigerant per year. <i>See</i> RIA at 29 (applying the 80% rate to 17-pound rail units).  |
| d | Each unit will have 1.5 additional hours of downtime due to the time taken during the 1.5 recharge visits per year. In addition, 80% will experience a maintenance inspection that would reasonably take the unit out of revenue generating activity for 2 days. The impact of not having equipment is evaluated by our customers at \$1000 a day, if they opt to do a short-term rental. The typical rental rate for a refrigerated trailer is \$600/day; Carrier assumed that a rental would only be required 1/8 of the time. |

## II. The EPA Should Reconsider the Inclusion of TRUs.

The EPA can, and should, reconsider the Rule on the specific issue of whether road and intermodal TRUs should be exempted from the Rule. This would allow the EPA to fully capture the actual costs of regulating these hundreds of thousands of additional units. Accordingly, the EPA should specifically take public comment on whether TRUs should be exempted through either: (1) adding an additional exemption to § 84.106(a)(3) (which already provides targeted exemptions); or (2) raising the threshold in § 84.106(a)(3) to thirty or more pounds of refrigerant.

### A. *The EPA has authority to reconsider this aspect of the Rule.*

The American Innovation and Manufacturing (“AIM”) Act authorizes the EPA to regulate HFCs in three main areas: phasing down the production and consumption of listed HFCs; management of these HFCs and their substitutes; and facilitating the transition to next-generation technologies by restricting use of these HFCs in the sector or subsectors in which they are used. *See* 42 U.S.C. § 7675, *et. seq.* The Rule focused on the second area: the management of these HFCs and their substitutes. Subsection (h) of the AIM Act, titled “Management of regulated substances” provides that “the Administrator shall promulgate regulations to control, where appropriate, any practice, process, or activity regarding the servicing, repair, disposal, or installation of equipment (including requiring, where appropriate, that any such servicing, repair, disposal, or installation be performed by a trained technician meeting minimum standards, as determined by the Administrator).” *See* 42 U.S.C. § 7675(h)(1). This provision repeatedly references the Administrator’s discretion both to promulgate regulations “where appropriate” and to impose certain requirements “where appropriate.” The statute therefore vests the Administrator with the authority to consider and reconsider whether it is appropriate to impose the LDAR requirements on TRUs now that the EPA has been made aware that a large class of TRUs falls under the language of the current regulation.

In addition, Subsection (k)(1)(A) of the Act authorizes the EPA to promulgate such regulations as are necessary to carry out its functions under the Act, including its obligations to ensure that the Act’s requirements are satisfied. *See* 42 U.S.C. § 7675(k)(1)(A). Subsection (k)(1)(C) further provides that CAA sections 113, 114, 304, and 307 apply to the AIM Act and any regulations promulgated thereunder as though the AIM Act were part of title VI of the CAA. *See id.* § 7675(k)(1)(C). By incorporating Section 307 of the CAA, Congress indicated that the CAA’s

rulemaking procedures are intended to apply here, including the Administrator’s revision of regulations, which is widely recognized in the applicable rulemaking provision. *See id.* § 7607(d). *Cf. id.* § 7601(a)(1).

Further, unless provided otherwise by statute, an agency may revise or rescind prior actions so long as it acknowledges the change in position, provides a reasonable explanation for the new position, and considers legitimate reliance interests in the prior position. *See FDA v. Wages & White Lion Invs., L.L.C.*, 604 U.S. 542, 568 (2025); *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 514-15 (2009); *Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 42 (1983); *Clean Air Council v. Pruitt*, 862 F.3d 1, 8 (D.C. Cir. 2017) (per curiam) (“Agencies obviously have broad discretion to reconsider a regulation at any time.”).

***B. Reconsideration is necessary to comply with multiple Executive Orders.***

The Rule was a significant regulatory action that was submitted to the Office of Management and Budget (“OMB”) for review pursuant to Executive Order 12,866: Regulatory Planning and Review (Sept. 30, 1993). *See* 89 Fed. Reg. at 82,857. Pursuant to Executive Order 12,866, the EPA must:

assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.

Section 1(b)(6), 58 Fed. Reg. 51,735, 51,736 (Oct. 4, 1993). In addition to assessing the costs, the EPA must also:

tailor its regulations to impose the least burden on society, including individuals, businesses of differing sizes, and other entities (including small communities and governmental entities), consistent with obtaining the regulatory objectives, taking into account, among other things, and to the extent practicable, the costs of cumulative regulations.

*Id.* § 1(b)(11), 58 Fed. Reg. at 51,736. The EPA could not and did not meet these obligations because it was not aware of, and therefore did not consider, the costs or burdens of regulating roughly 360,000 road TRUs. The Rule therefore places an undue burden on the American consumer, who will bear an estimated \$333 million annually in costs to receive their groceries and medications. Likewise, Section 4 of Executive Order 13,563 directs agencies to “consider regulatory approaches that reduce burdens.” 76 Fed. Reg. 3,821, 3,822 (Jan. 21, 2011).

***C. Reconsideration will lead to additional benefits without reducing the environmental benefits supporting the initial Rule.***

Because the EPA premised its analysis on the assumption that TRUs were not subject to the regulation, removing them through a new exemption at this point will not lessen the previously determined environmental benefits of the Rule. At the same time, reconsideration of the threshold could give rise to significant additional benefits. The EPA previously determined that “[t]he incremental effect of lowering the leak repair threshold from 30 lbs. or greater to 15 lbs. or greater decreases the [present value] of net benefits by \$269 million at a 3% discount rate (\$162 million

at 7% discount rate).” Draft Regulatory Impact Analysis Addendum: Analysis of the Economic Impact and Benefits of the Proposed Rule: American Innovation and Manufacturing (AIM) Act Subsection H Management of Regulated Substances § 4.6 (Sept. 2023), EPA-HQ-OAR-2022-0606-0023. The EPA should therefore assess whether to revise the Rule to increase benefits while decreasing costs.

***D. TRUs do not pose the same risks as stationary appliances subject to the LDAR requirements but have additional practical challenges to complying.***

Carrier understands and appreciates the EPA’s desire to fulfill its statutory mandate by ensuring that appliances with a certain threshold of refrigerants are not left to leak. As a practical matter, this is not a meaningful concern with TRUs. The nature of our business means that there is already frequent testing and checking on refrigerant levels, and there is significant commercial pressure to ensure that units are operating correctly in a leak-free condition. For instance, the value of each customer’s load means that there is little tolerance in the marketplace for units that lose HFC refrigerant and therefore risk unstable temperatures that could ruin cargo. This powerful market-driven incentive has long ensured that TRU operators proactively track refrigerant levels and promptly address any deficiencies, well before the Rule imposed additional regulatory obligations. Layering duplicative LDAR mandates on top of these existing commercial practices does not meaningfully reduce leak rates. Instead, it merely adds administrative cost and operational disruption to an industry that is already self-policing out of economic necessity.

In addition, the constant movement of TRUs across the country makes implementation of the LDAR requirements particularly challenging. It would require fleets to build in additional scheduling and downtime to units as they travel, and to find technicians in potentially remote locations who are trained, qualified, and knowledgeable in LDAR programs. These challenges are multiplied for our customers whose business models center around the rental and leasing of TRUs. First, only the units not currently being rented or leased are in the owner’s possession. This creates significant additional complexities to ensuring that the LDAR requirements are met, and that the owner can maintain the records required by the regulation. *See* 40 C.F.R. § 84.106(l). In situations where these units are leased out under long-term leases to fleet operators, it becomes increasingly difficult to track the individual unit over time, particularly where the lessee is treating multiple identical units as fungible.

For rental units not under long-term leases, these rules would prevent units from being rented out for significant periods of time after inspection, as these units cannot be rented for up to forty days due to post-leak repair verification requirements. *See id.* § 84.106(d)-(e). In addition, these businesses then must track down the unit a year later to conduct a follow-up leak detection 365 days after the repair. If the trailer is rented out at the time the inspection is due, this process becomes a significant inconvenience for customers, leading to downtime, revenue loss, and additional costs that are not factored into their current pricing model or EPA’s Rule. For example, in some instances TRU owners will be unable to give a rental customer another unit when they do not have any available in inventory. Even if they can provide a substitute, there are inefficiencies and costs associated with making the switch, including additional driver time and wear on the units. This swapping out leads to a domino effect for each unit that has to be taken out to meet the

LDAR requirements. Collectively, these requirements will result in significant lost revenue beyond what our conservative estimates have accounted for. Ultimately, those costs will be passed on and result in higher prices on groceries and other necessary consumer goods.

In addition, the mobile nature of TRUs also makes consolidating maintenance and service records effectively impractical. Because these units are constantly traveling, they may be serviced by any number of different providers depending on where they are at the time—whether at a Carrier or other TRU-manufacturer’s dealership, by a one-time independent service provider, by the fleet’s own in-house shop, or by a contract maintenance provider. Combining records from all of these disparate sources into a single, coherent repository for the purpose of assessing leak rates is an extraordinarily burdensome undertaking that the Rule does not adequately account for.

Simply put, the Rule imposes LDAR, verification, and recordkeeping requirements that are ill-fitted to road and intermodal TRUs, which are by nature constantly in transit. Likewise, the recordkeeping requirements call for documenting the “address where the appliance is located,” 40 C.F.R. § 84.106(l)(1)(ii), and “identity and location,” *id.* at § 84.106(l)(2)(i) of the appliance. While this kind of information may be valuable for a stationary appliance, it has little relevance for equipment that is perpetually on the move.

***E. The industry cannot conform to the current threshold without significant additional environmental impacts.***

Carrier has analyzed whether it would be possible to keep its TRUs with more than fifteen pounds of refrigerant below that charge level. Our internal assessments have concluded that doing so would be significantly less efficient, and would create additional air pollutants in order to accomplish the same task. Reducing refrigerant charge in existing systems would also diminish the unit’s heating and cooling capacity, placing temperature-sensitive cargoes at risk of spoilage or damage. Moreover, units operating with reduced capacity would need to run longer and harder to reach the desired temperature set point, consuming more TRU engine fuel and generating additional emissions in the process. Rather than encourage the industry to embrace these unintended environmental consequences, the EPA should revise the Rule and alleviate the current LDAR burden.

***F. The Rule already exempts comparable appliances from the LDAR requirements, and TRUs warrant the same treatment.***

The Rule itself recognizes the need to exempt certain categories of appliances from the LDAR requirements where enforcement and compliance concerns counsel against inclusion. Under § 84.106(a)(3)(ii), the EPA exempted all refrigerant-containing appliances used in the residential and light commercial air conditioning and heat pump subsectors from the leak repair provisions (even those with charge sizes at or above fifteen pounds) on the grounds that inclusion would “greatly expand the number of refrigerant-containing appliances subject to the leak repair requirements and may make the enforcement of the leak repair provisions inefficient,” and would cause “additional strain on contractors and technicians who are necessary to complete the repair of leaking appliances.” *See* 89 Fed. Reg. at 82,717, 82,719. The EPA further concluded that the exemption

was “administratively more efficient” and would “ease implementation for this first rule under subsection (h).” *Id.*

Those same rationales apply with equal or greater force to TRUs. As previously noted, Carrier estimates that a staggering 360,000+ TRUs fall above the fifteen-pound charge threshold and—unlike stationary residential and light commercial systems serviced by established local repair specialists—TRUs are mobile, travel continuously across the country, and often require servicing in remote locations where qualified technicians are scarce. Having determined that enforcement inefficiency, administrative burden, and technician strain justify an exemption for residential and light commercial air conditioning, the EPA should apply the same reasoning and exclude road and intermodal TRUs.

### **III. Conclusion**

For the reasons explained above, Carrier requests that the EPA revise the Rule to clarify that road and intermodal TRUs are not covered. Please help us to ensure that American consumers are not inadvertently burdened by these considerable and unconsidered costs. We look forward to working with you and your staff to resolve them. Please feel free to contact me +1-336-602-3866 if you have questions or need more information.

Sincerely,



Ed Dryden  
President, Climate Solutions Transportation  
Carrier



Cc: Aaron Szabo

**Petition HCF Rule - Signature Summary**

I. American Trucking Association..... 11

II. TRALA..... 12

III. Dairy Farmers of America ..... 13

IV. Ryder System INC..... 14

V. Penske Truck Leasing..... 15

VI. PLM Fleet, LLC..... 16

VII. In-N-Out ..... 17

VIII. Southwest Traders, Inc. .... 18

IX. Northern Refrigerated Trans. Inc. .... 19

X. Rockview Farms ..... 20

XI. Continental E&S Foodservice ..... 21

XII. Associated Wholesale Grocers ..... 22

XIII. Feeding America Riverside San Bernardino ..... 23

XIV. Witte Bros, Exchange, Inc. .... 24

XV. LAD Truck Lines, Inc..... 25

XVI. Colonial Cartage Corporation..... 26

XVII. Brakebush Transportation..... 27

XVIII. Climate Express, INC..... 28

XIX. Donahue Idealease ..... 29

XX. OK Produce..... 30

XXI. American Truck Bodies & Repair, INC. .... 31

XXII. Quality Custom Distribution ..... 32

XXIII. WTR Corporation..... 33

XXIV. Rush Truck Leasing..... 34

XXV. Transportation Equipment Network ..... 35

XXVI. Bush Brother’s & Company..... 36

XXVII. Travis Trucking LLC ..... 37

XXVIII. Eagle Distributing Co..... 38

XXIX. Nebraska Atlantic Transportation ..... 39

XXX. Zeitner and Sons, Inc..... 40

XXXI. Williams Transportation Inc.....	41
XXXII. Outlaw Express LLC .....	42
XXXIII. Greater Omaha Express LLC .....	43
XXXIV. W.N. Morehouse Truck Line Inc. ....	44
XXXV. Olympia Transportation .....	45
XXXVI. Wick’s Truck Trailers .....	46
XXXVII. Trius Trucking.....	47
XXXVIII. Velocity Truck Rental & Leasing .....	48
XXXIX. Rollin R Enterprises Inc.....	49
XL. Cooke Trucking Company, Inc.....	50
XLI. Grand Island Express .....	51

**I. American Trucking Association**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: American Trucking Associations

Signature: 

Name: Patrick Kelly

Title: Vice President, Energy & Environmental Affairs

Date: April 16, 2026

---

**II. TRALA**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Truck Renting and Leasing Association

Signature:  \_\_\_\_\_

Name: \_\_\_\_\_ Jake Jacoby \_\_\_\_\_


Title: \_\_\_\_\_ President & CEO \_\_\_\_\_

Date: \_\_\_\_\_ 4/11/26 \_\_\_\_\_

**III. Dairy Farmers of America**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Dairy Farmer's of America

Signature:   
\_\_\_\_\_

Name: Adam Jones

Title: Senior Director of Fleet Operations

Date: 4/15/2026

---

**IV. Ryder System INC.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: RYDER SYSTEM INC.

Signature: *Sanford Hodes*

Name: Sanford Hodes

Title: Senior Vice President

Date: 04/15/2026

---

**V. Penske Truck Leasing**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Penske Truck Leasing Co., L.P.

Signature: 

Name: Paul Rosa

Title: Senior Vice President, Procurement and Fleet Planning

Date: 04/15/2026

---

VI. PLM Fleet, LLC

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: PLM FLEET, LLC

Signature: 

Name: Timothy J. Anderson

Title: Director - Refrigeration

Date: 4/13/2026

---

**VII. In-N-Out**

13502 Hamburger Lane  
Baldwin Park, California 91706-5885  
(626) 813-8200



The Best Enterprise  
Is A Free Enterprise™

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: In-N-Out Burger

Signature: 

Name: Jim Wilcox

Title: Regulatory & Compliance Manager


Date: 04-15-2026

---

**VIII. Southwest Traders, Inc.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Southwest Traders, Inc.

Signature: 

Name: Shawn Lee

Title: Chief Operating Officer

Date: 04/13/2026

---

**IX. Northern Refrigerated Trans. Inc.**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Northern Refrigerated Trans. Inc.

Signature: 

Name: Mike Wecker

Title: Director of Fleet Maintenance

Date: 4/13/2026

---

**X. Rockview Farms**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Rockview Farms

Signature:  \_\_\_\_\_

Name: Ismael Vargas

Title: Manager

Date: April 14, 2026

**XI. Continental E&S Foodservice**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: CONTINENTAL E&S FOODSERVICE

Signature: 

Name: MARC TAUBAZ

Title: VICE PRESIDENT

Date: 4/15/26

---

**XII. Associated Wholesale Grocers**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Associated Wholesale Grocers

Signature: Tony Hoffmann

Name: Tony Hoffmann

Title: Fleet Maintenance Mgr.

Date: 4/9/2026

---

**XIII. Feeding America Riverside San Bernardino**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Feeding America Riverside San Bernardino

Signature: John Crooks

Name: John Crooks

Title: Vice President Operations


Date: 4/16/26

---

**XIV. Witte Bros, Exchange, Inc.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Witte Bros. Exchange, Inc.

Signature: 

Name: Brent B Witte

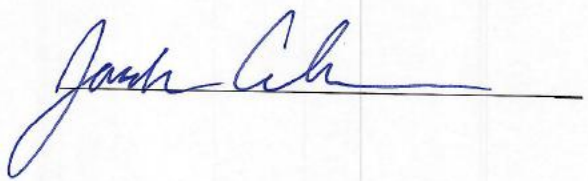
Title: President

Date: 4/13/2026

**XV. LAD Truck Lines, Inc.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: LAD Truck Lines, Inc.

Signature: 

Name: Jordan Culver

Title: V.P., Safety & Maintenance

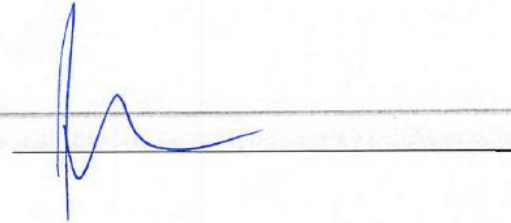
Date: 4/10/2026

**XVI. Colonial Cartage Corporation**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: COLONIAL CARTAGE CORPORATION

Signature:

A handwritten signature in blue ink, appearing to read 'JOE RUZICKA', is written over a horizontal line.

Name: JOE RUZICKA


Title: FLEET MAINTENANCE MANAGER

Date: 4/10/2026

**XVII. Brakebush Transportation**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Brakebush Transportation Inc.

Signature: 

Name: Mark Bond

Title: Fleet Maintenance Manager

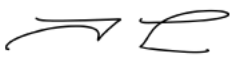
Date: April 13<sup>th</sup> 2026

---

**XVIII. Climate Express, INC.**

**The undersigned hereby signs onto and supports Carrier’s Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: CLIMATE EXPRESS, INC.

Signature: 

Name: Tim Laske

Title: President

Date: 4/14/2026

---

**XIX. Donahue Idealease**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Donahue Idealease

Signature: 

Name: Richard Kopp

Title: VP of Leasing

Date: 4/14/2026

---

**XX. OK Produce**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: OK Produce

Signature: 

Name: Bob Thomason

Title: Direct of Transportation

Date: April 14, 2026

**XXI. American Truck Bodies & Repair, INC.**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name:

American Truck Bodies & Repair, INC.

Signature:



Name:

Ralph Giordani

Title:

President

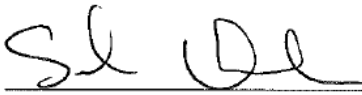
Date:

04/14/26

**XXII. Quality Custom Distribution**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Quality Custom Distribution

Signature: 

Name: Saul Penaloza

Title: Wharehouse Manager

Date: 4/14/26

---

**XXIII. WTR Corporation**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: WTR CORPORATION

Signature: 

Name: KENNETH HARDWICK

Title: PRESIDENT

Date: APRIL 15, 2026

**XXIV. Rush Truck Leasing**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Rush Truck Leasing

Signature: R. Toman

Name: Rogen Toman

Title: Sales

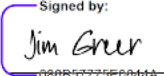
Date: 4-15-24

---

## XXV. Transportation Equipment Network

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Transportation Equipment Network

Signature:  Signed by: Jim Greer  
080857775E004A

Name: Jim Greer

Title: Chief Strategy Officer

Date: 4/16/2026

---

**XXVI. Bush Brother's & Company**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Bush Brother's & Company

Signature: Joshua S. McNutt

Name: Joshua S. McNutt

Title: Facilities Coordinator

Date: 4-16-26

---

**XXVII. Travis Trucking LLC**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name:

Travis Trucking LLC

Signature:

Wm. J. Hickman

Name:

William Travis Hickman

Title:

OWNER

Date:

4/14/26

**XXVIII. Eagle Distributing Co.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Eagle Distributing Co

Signature: Larry Shupe

Name: LARRY SHUPE

Title: Flot manager

Date: 4/10/26

---

**XXIX. Nebraska Atlantic Transportation**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Nebraska Atlantic Transportation

Signature: 

Name: Matt Olson

Title: VP Dispatch

Date: 4/16/26

**XXX. Zeitner and Sons, Inc.**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Zeitner & Sons Inc

Signature: 

Name: Justin Zeitner


Title: VP

Date: 4-15-26

**XXXI. Williams Transportation Inc.**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Williams Transportation Inc

Signature: 

Name: Caleb Williams

Title: operations mgr.

Date: 4-15-26

**XXXII. Outlaw Express LLC**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Outlaw Express LLC

Signature: 

Name: Rick J Birdsall

Title: Owner

Date: 4/15/2026

**XXXIII. Greater Omaha Express LLC**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Greater Omaha Express LLC

Signature:  Brent Falgione  
B1CA2212F1A348B

Name: Brent Falgione

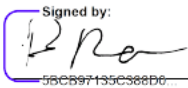
Title: President

Date: 4/15/2026

**XXXIV. W.N. Morehouse Truck Line Inc.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: W.N Morehouse Truck Line Inc

Signature:  Signed by:  
55CB97135C368D6

Name: Brad Morehouse

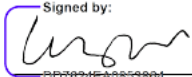
Title: President

Date: 4/15/2026

**XXXV. Olympia Transportation**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Olympia Transportation \_\_\_\_\_

Signature:  Signed by: \_\_\_\_\_  
DD7824FA0853804...

Name: Lisa Henry \_\_\_\_\_

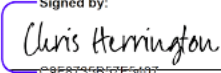
Title: Maintenance Director \_\_\_\_\_

Date: 4/15/2026 \_\_\_\_\_

**XXXVI. Wick's Truck Trailers**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Wick's Truck Trailers \_\_\_\_\_

Signature:  \_\_\_\_\_  
Signed by: Chris Herrington  
C9F8735B57F5487...

Name: Chris Herrington \_\_\_\_\_

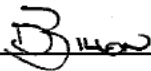
Title: Sales \_\_\_\_\_

Date: 4/15/2026 \_\_\_\_\_

XXXVII. Trius Trucking

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: TRUIS TRUCKING

Signature: 

Name: DAWN BILLEN

Title: MANAGER

Date: 4-16-25

**XXXVIII. Velocity Truck Rental & Leasing**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Velocity Truck Rental + Leasing

Signature: 

Name: Andy Lewis

Title: VP of Assets

Date: 4.16.26

**XXXIX. Rollin R Enterprises Inc**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: ROLLIN R ENTERPRISES INC

Signature:  \_\_\_\_\_

Name: ERIC CASTRO

Title: FLEET OPERATIONS

Date: 4/15/26

**XL. Cooke Trucking Company, Inc.**

**The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026**

Company Name: Cooke Trucking Company, Inc.

Signature: 

Name: Shannon Branch

Title: Director Safety & Compliance

Date: 4/17/2026

**XLI. Grand Island Express**

The undersigned hereby signs onto and supports Carrier's Petition to Revise the Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes Under the American Innovation and Manufacturing Act of 2020 Rule, 89 Fed. Reg. 82682 (October 11, 2024), codified at 40 C.F.R. Part 84, Subpart C dated April 8, 2026

Company Name: Grand Island Express

Signature: 

Name: James A. Pirnie

Title: President

Date: 4/17/26