
**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Case No. _____

THE AIR-CONDITIONING, HEATING, AND REFRIGERATION INSTITUTE
and THE ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY,
PETITIONERS,

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY *and* LEE M. ZELDIN, *in his official capacity as
Administrator of the United States Environmental Protection Agency,*
RESPONDENT.

PETITION FOR REVIEW

Pursuant to Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1); the Administrative Procedure Act, 5 U.S.C. § 702; the American Innovation and Manufacturing Act of 2020, 42 U.S.C. § 7675(k)(1)(C); Federal Rule of Appellate Procedure 15(a); and D.C. Circuit Rule 15, Petitioners the Air-Conditioning, Heating, and Refrigeration Institute (“AHRI”) and the Alliance for Responsible Atmospheric Policy (“Alliance”) hereby petition the United States Court of Appeals for the District of Columbia Circuit for review of Respondent United States Environmental Protection Agency’s final 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,” 91 Fed. Reg. 31,284 (May 26, 2026), attached to this Petition as Attachment A.

Petitioners seek review only of the portions of the final rule amending 40 C.F.R. § 84.54(c)(11), addressing remote condensing unit systems; 40 C.F.R. § 84.54(c)(12), addressing supermarket systems; and the portion of the final rule implementing a 60-day effective date for those amendments notwithstanding 42 U.S.C. § 7675(i)(6), within the American Innovation and Manufacturing Act of 2020. Petitioners seek review on the ground that these portions of the final rule are arbitrary and capricious, contrary to the American Innovation and Manufacturing Act of 2020, and otherwise not in accordance with law.

Petitioners request that this Court hold unlawful, vacate, enjoin, and set aside those portions of the final rule and provide such additional relief as may be necessary and appropriate.

Dated: June 25, 2026

Respectfully submitted,

JAMES W. BEERS, JR.
TROUTMAN PEPPER LOCKE LLP
401 9th Street, N.W.
Suite 1000
Washington, DC 20004
(202) 274-1934
james.beers@troutman.com

KAITLIN L. O'DONNELL
TROUTMAN PEPPER LOCKE LLP
1313 N. Market St., Suite 1000
Wilmington, DE 19801
(302) 777-6541
kaitlin.odonnell@troutman.com

CARSON A. COX
TROUTMAN PEPPER LOCKE LLP
1001 Haxall Point, 15th Floor
Richmond, VA 23219
(804) 697-1338
carson.cox@troutman.com

/s/ Misha Tseytlin

MISHA TSEYTLIN
Counsel of Record
KEVIN M. LEROY
TROUTMAN PEPPER LOCKE LLP
111 S. Wacker Dr., Suite 4100
Chicago, IL 60606
(608) 999-1240 (MT)
(312) 759-1938 (KL)
(312) 443-0336 (fax)
misha.tseytlin@troutman.com
kevin.leroy@troutman.com

*Attorneys for the Air-
Conditioning, Heating, and
Refrigeration Institute and the
Alliance for Responsible
Atmospheric Policy*

CORPORATE DISCLOSURE STATEMENTS

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, Petitioners provide the following corporate disclosure statements:

Petitioner the Air-Conditioning, Heating, and Refrigeration Institute (“AHRI”) states that it is a national trade association. AHRI has no parent entity, and no publicly held corporation has a 10% or greater ownership interest in AHRI.

Petitioner the Alliance for Responsible Atmospheric Policy (“Alliance”) also states that it is a national trade association. The Alliance has no parent entity, and no publicly held corporation has a 10% or greater ownership interest in the Alliance.

Dated: June 25, 2026

/s/ Misha Tseytlin
MISHA TSEYTLIN
TROUTMAN PEPPER LOCKE LLP
111 S. Wacker Dr., Suite 4100
Chicago, IL 60606
(608) 999-1240
(312) 443-0336 (fax)
misha.tseytlin@troutman.com

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on June 25, 2026, I filed the foregoing Petition For Review with the Clerk of the U.S. Court of Appeals for the District of Columbia Circuit using the CM/ECF System.

Pursuant to D.C. Circuit Rule 15(a) and Federal Rules of Appellate Procedure 15(c) and 25(d), I certify that on June 25, 2026, a true and accurate copy of this Petition For Review was served via first class mail on the following addresses:

Lee M. Zeldin, Administrator
United States Environmental Protection Agency
Office of the Administrator
Mail Code 1101A
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Correspondence Control Unit
Office of the General Counsel
United States Environmental Protection Agency
Mail Code 2311
1200 Pennsylvania Avenue N.W. #4000
Washington, D.C. 20460

Todd Blanche, Acting Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

Dated: June 25, 2026

/s/ Misha Tseytlin

MISHA TSEYTLIN

TROUTMAN PEPPER LOCKE LLP

111 S. Wacker Dr., Suite 4100

Chicago, IL 60606

(608) 999-1240

(312) 443-0336 (fax)

misha.tseytlin@troutman.com