



Advanced Distributor Products

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Regulatory Update – R-410A coils in 2025

July 2, 2024

Dear Valued Customer,

ADP strives to keep you informed of changing regulations and the impact on your business. To that end, we want you to be aware of an important nuance in the 2025 sell-through exception for R-410A systems.

The rule EPA published specifies to legally install a new R-410A system in 2025, both the outdoor unit and indoor evaporator need to have been manufactured in 2024 or earlier:

High-GWP systems (R-410A) “may be installed prior to January 1, 2026, where all specified components of that system are manufactured or imported prior to January 1, 2025.”

(40 CFR 84.54(c)(1) [https://www.ecfr.gov/current/title-40/part-84/section-84.54#p-84.54\(c\)\(1\)](https://www.ecfr.gov/current/title-40/part-84/section-84.54#p-84.54(c)(1)))

The term “specified component” is defined as “condensing units, condensers, compressors, evaporator units, and evaporators.”

(40 CFR 84.52 “Specified component” [https://www.ecfr.gov/current/title-40/part-84/section-84.52#p-84.52\(Specified%20component\)](https://www.ecfr.gov/current/title-40/part-84/section-84.52#p-84.52(Specified%20component)))

Note this does not apply to coils installed individually to service existing R-410A systems. Currently the regulations allow those to be manufactured and installed indefinitely.

Here are several example scenarios where this regulation comes into play:

- 1) A homeowner’s R-410A outdoor unit has a failed compressor. The compressor or entire outdoor unit can be replaced with units manufactured before or after January 1, 2025.
- 2) A technician finds a leaking evaporator coil on an R-410A system. It can be replaced with a new coil built before or after January 1, 2025
- 3) A dealer wants to install a new R-410A system after January 1, 2025. Both the outdoor unit and indoor coil must have been manufactured prior to January 1, 2025.

We wanted to ensure you were aware of this requirement as we enter the second half of the year and you begin to consider your inventory strategy going into 2025. As you make your plans we are ready to assist in any way, for example by transitioning you to our FlexCoil products that will give you low-GWP readiness while being backward compatible.

If you have any questions or need additional information, please do not hesitate to contact us.

Best regards,

A handwritten signature in blue ink, appearing to read 'Timothy Orr', is positioned above the printed name.

Timothy Orr

Director, Marketing & Product Management