Proposed EPA & NHTSA Regulation of Commercial Trailers Used with Combination Tractors

Frequently Asked Questions

Brief answers to common questions about EPA's and NHTSA's proposed regulation of trailers.

Why Are EPA & NHTSA Proposing To Regulate Trailers?

EPA and DOT each have statutory responsibilities to control heavy-duty vehicle pollutant emissions and fuel consumption. Trailers pulled by combination tractors are part of that vehicle. Trailers contribute significantly to carbon pollution emissions, and to the vehicle's fuel consumption. Cost-effective technologies, including aerodynamic devices, low rolling resistance tires, and automatic tire inflation systems can offer significant CO_2 emissions and fuel use reductions for the vehicle, providing a benefit to the environment and the nation's energy security, and reducing fuel costs.

When Would The Proposed Regulations Take Effect?

Initial proposed standards for trailers would apply beginning January 1, 2018 in the EPA program. NHTSA's trailer standards would be voluntary from 2018 to 2020, becoming mandatory in 2021. The standards would gradually increase in stringency in model years 2021 and 2024, and the most stringent requirements would not apply until model year 2027. During these years manufacturers would make incrementally greater improvements to their new trailers to increase fuel efficiency and reduce CO_2 emissions.

How Do EPA's Regulations Relate To NHTSA's Regulations?

NHTSA's proposed fuel consumption standards are authorized under the Energy Independence and Security Act of 2007, and EPA's proposed GHG emission standards are authorized under the Clean Air Act.

EPA and NHTSA worked very closely to ensure that EPA's CO_2 proposed regulations and NHTSA's proposed fuel efficiency regulations are fully harmonized. The agencies also propose that manufacturers would submit a single report to show compliance with both programs.

What Are The New Regulations Being Proposed for Trailers?

The proposed program is designed with separate performance-based standards for four box trailer subcategories:

- ***Long-box dry vans***
- ***Long-box refrigerated vans***
- ***Short-box dry vans***
- ***Short-box refrigerated vans***

Box trailer manufacturers can choose the combination of technologies they believe are right for the market, which include:

- Aerodynamic devices
- Lower rolling resistance tires
- Automatic tire inflation systems
- Light-weight components

Box trailers with work-performing devices that inhibit the use or effectiveness of aerodynamic technologies may be eligible to meet reduced standards.

Non-box trailers (including platform/flatbed, tank, container chassis and other specialty trailers) would be required to use lower rolling resistance tires and automatic tire inflation systems.

What is NOT Covered?

The agencies are only regulating heavy-duty trailers pulled by tractors. Certain specialized trailers such as logging, mining, and livestock trailers, and trailers intended for temporary or permanent residence or office space (mobile homes and campers) would not be subject to new regulatory requirements.

What Are the Benefits of the Trailer Standard?

The CO_2 and fuel consumption reductions vary based on trailer type, technologies already incorporated, typical operation, and miles traveled. Compared to conventional trailers, the fully phased-in program would result in CO_2 and fuel consumption reductions up to 8 percent for 2027 model year trailers, depending on the type of trailer.

The agencies projected fuel savings for new trailers of all types by model year in combination with the tractors. We project that all model year 2027 combination tractor-trailer vehicles will save up to $20 billion over their lifetimes as a result of the new standards. We also estimate that as much as one-quarter of those savings would result from the trailer standards. This could translate to $20,000 fuel savings over the life of the average model year 2027 trailer. Such savings would fully offset the additional costs associated with these more fuel efficient trailers in less than two years.

Are New or Untested Technologies Required to Meet the Standard?

Most of the technologies that would enable trailers to meet the standard are already on the road, and are used by many leading fleets to reduce fuel costs. EPA's voluntary SmartWay program helps freight companies identify operational strategies, equipment and technologies that save fuel and lower emissions, and many of the SmartWay-verified trailer technologies could be used to meet the proposed standards. SmartWay has verified trailer technologies that reduce fuel use and GHG emission since 2005, and designated SmartWay tractors and trailers since 2007.

Would The Proposed Standards Limit The Type Of Features Available On Trailers In The Marketplace?

No. EPA and NHTSA consulted extensively with trailer manufacturers and fleet owners to design proposed standards that would not limit trailer features or compromise trailer capabilities. The technologies that could be used to meet the standards would offer fuel savings that would offset any additional up-front cost increase within a reasonable timeframe.

Can I Still Use My Old Trailer?

Yes. These proposed standards only apply for new trailers. There is no requirement for owners or operators to retire or retrofit trailers.

Are There Any Compliance Flexibilities Available?

Yes. Trailer manufacturers have emphasized to us the importance of simplicity. The agencies are proposing a simplified compliance program with options to demonstrate trailer performance without requiring the trailer manufacturers to perform device testing or vehicle modeling.

In addition, trailer manufacturers have indicated that unique manufacturer-customer relationships make it challenging for them to benefit from multi-year flexibilities such as traditional averaging, banking and trading programs. Instead, we are proposing a more limited approach in which manufacturers could comply by ensuring that the average performance of all the trailers they sell for a single model year meet the standard for that same year. Comments on the proposal will help the agencies to further simplify the compliance program.

Did The Agencies Seek Input From Small Manufacturers?

Yes. Both agencies consider small business impacts under the Regulatory Flexibilities Act. Additionally, in accordance with the Small Business Regulatory Enforcement Fairness Act, EPA conducted a formal process to solicit input from representative small businesses. The conclusions of that process are reported in detail in the proposed rule.

What Regulatory Relief Or Flexibilities Are Proposed For Small Businesses?

Because so many trailer manufacturers are small businesses, the agencies designed the entire trailer program to work for small businesses. In addition, the agencies are proposing that those trailer manufacturers

that have less than 500 employees and qualify as small businesses may begin compliance in MY 2019, one year after the rest of the industry. This would provide small businesses with additional lead time to make any staffing, process, or production adjustments that may be necessary to meet the proposed requirements.

How Do I Provide Input On The Proposed Regulations?

The agencies welcome your input on this proposed rule. Further information on opportunities for public participation may be found on EPA's and NHTSA's websites (see below for more information). You should consult the Federal Register notice for this proposal for more information about how to submit comments, when the comment period will close, and about where and when public hearings will be held. You can access the proposed joint rules and related documents on EPA's Office of Transportation and Air Quality (OTAQ) Web site at: www.epa.gov/otaq/climate/regulations.htm .

You can access the proposed joint rules and related documents, including the Draft Environmental Impact Statement, on NHTSA's Fuel Economy Web site at: www.nhtsa.gov/fuel-economy