



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
2565 PLYMOUTH ROAD  
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF  
AIR AND RADIATION

July 20, 2017

Cynthia Kerr  
Eco Flaps  
5210 Maryland Way, Suite 100  
Brentwood, TN 37027

Dear Ms. Kerr:

This letter is in response to your request received on June 1, 2017, for preliminary approval of the measured performance of aerodynamic trailer devices under EPA regulations at 40 CFR 1037.211 and 40 CFR 1037.150(u). Based on information you provided to us and subject to the enclosed terms and conditions, EPA approves this request for the following device(s):

Device Approval ID	Device Description	$\Delta C_dA$ (m <sup>2</sup> )	Suitable Trailer Types
EF120170700001	Eco-Flap	0.14	long dry vans, short dry vans, long refrigerated vans, short refrigerated vans, tanks, flatbeds, container chassis

This preliminary approval for the subject devices is valid for use with certification of HD Highway Trailers through model year 2020, as long as you fully comply with the enclosed terms and conditions. If you have any questions, please send an email to [complianceInfo@epa.gov](mailto:complianceInfo@epa.gov).

Sincerely,

Byron Bunker, Director  
Compliance Division  
Office of Transportation and Air Quality

## Preliminary Approval of Trailer Aerodynamic Device

### Terms and Conditions

By accepting EPA's preliminary approval, the requestor agrees to the following terms and conditions, which are necessary to enable certifying trailer manufacturers that elect to rely on these devices as part of their certification, to comply with applicable sections of the Phase 2 regulations and the Clean Air Act.

- a. You may not represent any device as being covered by this approval if it differs materially from the device(s) you identified in your request.<sup>1</sup> If you plan to modify the design specifications of your device(s), review 40 CFR 1037.225 and contact the Compliance Division to learn if you need to submit a new or revised request.
- b. You must share the approved test data for the subject aerodynamic device(s) with certifying trailer manufacturers, who must keep records documenting the measured performance of the subject device(s). Certifying trailer manufacturers must maintain these records for eight years after they stop relying on the information in support of a trailer certificate.
- c. You must provide device installation instructions to certifying trailer manufacturers for use by installers.
- d. EPA reserves the right to conduct testing of aerodynamic devices. Devices must be provided to EPA for our testing if we request it.
- e. If EPA finds that a device covered by this approval does not perform as described, you and the trailer certificate holder may be subject to recall provisions for affected devices (see 40 CFR 1068.505). For example, if we find a defect, we may require you and the certificate holder to recall affected products to correct the defect.
- f. When multiple manufacturers are involved in producing a vehicle, EPA normally presumes the primary responsibility lies with the certificate holder. Responsibilities for multiple manufacturers are described in 40 CFR 1037.620.

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<sup>1</sup> In this context, "differs materially" means it is not within the range of device variations described in the request, and performs worse than the approved worst case variation.