

## UPDATE: Greenhouse Gas Emissions – Phase 2 for Trailers

The rulemaking along with its ancillary rules comprise over 7,700 pages



The entire rule can be downloaded at the EPA website:

[here](#)

In October 2016, Greenhouse Gas Emission – Phase 2, better known as GHG-2, became law with an effective date of January 1, 2018. The goal of this rulemaking is to improve commercial vehicle fuel economy in order to continue reducing greenhouse gasses into the atmosphere. The rulemaking is a 10-year rule increasing in stringency every 3 years. Over the 10-year period, the total fuel economy savings estimated by EPA is approximately 196 billion dollars.

Under GHG-2 the responsibility is on the vehicle manufacturers to meet the new guidelines. Tractor and trailer OE's are obliged to meet their vehicle fuel economy targets or be subject to significant financial penalties. Trucking fleets can spec their tractors and trailers with various fuel efficient options to meet and/or exceed the guidelines.

The Corporate Average Fuel Economy (CAFE) are regulations in the United States, first enacted by the U.S. Congress in 1975 in the wake of the Arab Oil Embargo, and were intended to improve the average fuel economy of cars and light trucks. 2005 is the baseline year the EPA uses for fuel economy values. By 2025, greenhouse gasses target reduction is 28% from the 2005 levels. And by year 2050, the target is for an 80% reduction. Because cars represent about 61% of the total transportation "pie", they have been targeted by CAFE standards for many years. The second largest slice of the pie is commercial heavy duty vehicles representing 23%, which is why trucking is now in the crosshairs.

GHG-2 is the first time that emission reduction requirements have been placed on trailer equipment. Both box (including reefers) and non-box trailers are covered and each has a different target. Non-box trailers are primarily composed of flat beds, tankers, and container chassis. The only trailers excluded from the regulation are those trailers with four or more axles and trailers under 35' in length.

Since non-box trailers are considered "working" vehicles, they will be obliged to use low rolling resistance tires and either automatic tire inflation systems (ATIS) or tire pressure monitoring systems (TPMS) to meet their targets. Since TPMS solutions still require human intervention to address the problem, the fuel economy credit is less than that of ATIS. Fleets should take this into account when selecting which solution to choose. Many of these solution providers have online tools to calculate the return on investment, with variable inputs that can be tailored to the individual fleet parameters.

Box trailers have a much wider range of options to increase fuel efficiency:

- Side skirts
- Nose cones
- Low rolling resistance tires
- Automatic tire inflation
- Tire pressure monitoring
- Lightweight materials
- Gap reducers between tractor and trailer
- Wheel covers

It is important for fleets to be proactive in spec'ing their trailers for the future as the trailer OE's will be pushing more fuel efficient equipment.

One last important point:

- The standards do not provide incentives for manufacturers to shift employment between domestic and foreign production **because the proposed standards will apply to vehicles sold in the U.S. regardless of where they are produced.**

An excellent resource to evaluate many of these technologies is the North American Council for Freight Efficiency (NACFE) and Trucking Efficiency. Their website [www.truckingefficiency.org](http://www.truckingefficiency.org), has an array of Confidence Reports on many of the technologies referenced by the legislation, and they are available at no-charge.

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