UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

OCT 6 2016

OFFICE OF
AIR AND RADIATION

Mr. Russell Stubbs
Eco Flaps
5210 Maryland Way,
Brentwood, TN 37027

Dear Mr. Stubbs:

The U.S. Environmental Protection Agency (EPA) has reviewed your request to verify the Eco Flaps aerodynamic splash guard on a standard 53' heavy-duty truck trailer. This device is designed to increase the aerodynamic efficiency of trailers to improve the overall fuel economy of the combination tractor-trailer. Based upon your application, test data and supporting information, EPA hereby verifies the Eco Flaps aerodynamic splash guard, applicable to both dual and single tire applications, for the level described below:

Device Name	Fuel Savings Category	Device Category	Testing Method	Test Protocol
Eco Flaps Aerodynamic Splash Guard	1%	Splash Guard	Coastdown (2014)	Post-2014

EPA verification is contingent upon devices being installed and maintained as they were tested. The Eco Flaps fuel savings was based on Coastdown testing (SAE J2978 Coastdown Testing procedures) as compared to a conventional solid splash guard. EPA's Verification Procedure Option "B" was used with alternating back and forth runs with immediate exchange between baseline solid splash guards and the Eco Flaps splash guards. The testing was conducted without any other aero devices on the trailer (i.e. side skirts), and standard solid splash guards remained on the tractor, as baseline, throughout all testing. A commercial solid 24 inch by 28 inch splash guard was used, and the Eco Flaps splash guard maintained the same dimensions. The trailer utilized a dual tire configuration. The splash guards were mounted in the same location on the same mounting brackets immediately behind the tires.

Any significant change(s) to the technology from the tested configuration is not automatically verified and may cause a drop in performance. Manufacturers must submit all significant modifications in advance to the EPA for approval. EPA reserves the right to conduct testing of aerodynamic devices submitted for verification. Verification approval and web listing may be revoked if devices are modified in any way from the devices tested and described in the application or if it fails to meet requirements in EPA testing.

While fleets can expect EPA-verified aerodynamic devices and SmartWay Trailers to be among the most fuel efficient, the fuel savings in real-world applications may vary. In addition, EPA verifies technologies based on measured fuel savings and/or other criteria described herein. While EPA may request related information, verification is not an indication of endorsement, safety, regulatory, compliance or other performance consumers should consider. Manufacturers, installers, and consumers must comply with all applicable local, state, and federal safety regulations.

This technology will be listed on the EPA's verified aerodynamic product website at: https://www.epa.gov/verified-diesel-tech/smartway-verified-list-aerodynamic-devices This letter and the EPA's online verified product listing may serve as demonstration of your device's verification.

EPA has strict guidelines regarding the use of the SmartWay logo. SmartWay designation (and associated use of the SmartWay designation logo) is limited to manufacturers of heavy-duty tractors, box trailers, or passenger cars. Vehicle component technologies (e.g., trailer aerodynamic equipment) are not allowed to use the SmartWay logo for labeling purposes. If you have questions regarding these policies, please consult https://www.epa.gov/smartway/learn-about-smartway-tractors-and-trailers or contact Joann Jackson-Stephens at jackson-stephens.joann@epa.gov.

If you have any questions regarding your verification or the program, please feel free to contact our aerodynamic technology staff person, Arman Tanman, at tanman.arman@epa.gov. Thank you for your interest in EPA's Technology Verification Program.

Sincerely,

Karl Simon, Director
Transportation and Climate Division
Office of Transportation and Air Quality