Phasedown of Hydrofluorocarbons/Excluding Road and Intermodal Container Transport: Truck Renting and Leasing Associations Comments on U.S. EPA Proposed Rule

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The Truck Renting and Leasing Association ("TRALA") submitted July 10th comments to the United States Environmental Protection Agency (EPA) addressing the following proposed rule:

Phasedown of hydrofluorocarbons, excluding road and intermodal container transport refrigeration units from the hydrofluorocarbon leak repair requirements.

See 91 Fed. Reg. 30,532, Docket ID No. EPA-HQ-OAR-2026-2905

The proposed rule would exclude road and intermodal container transport refrigeration units from the hydrofluorocarbon leak repair requirements under 40 C.F.R. § 84.106.

TRALA describes the organization as representing the interest of approximately 475 truck renting and leasing companies and nearly one hundred supplier companies. The members are stated to provide:

… short-term commercial rental vehicles, short-term consumer rental vehicles, and full-service leases to customers who operate a vehicle or a fleet of vehicles.

By way of introduction, TRALA states it appreciates:

… EPA's recognition that road and intermodal container TRUs should not be subject to leak repair requirements that were designed for stationary refrigeration equipment.

Further, the organization states that it supports the EPA's proposal to clarify that road and intermodal TRUs are excluded from the requirement of 40 C.F.R. § 84.106 regardless of charge size.

The components of TRALA's comments:

- EPA should finalize the exclusion for road intermodal container TRUs (arguing that its members operate in a fundamentally different environment in fixed refrigeration systems and: 1) move across state lines; 2) are frequently in the possession of customers; 3) may be serviced by different maintenance providers; and, 4) are often used in time-sensitive operations where equipment availability is critical.
- Current leak repair requirements are ill-suited for rental and leasing operations (unlike stationary refrigeration systems, rented and leased TRUs are frequently not in a continuous possession or

control of the equipment owner/mobility creates significant compliance challenges because leak repair requirements include obligation related to leak rate calculations, repair timelines, verification testing, follow-up inspections, and record keeping).

- The rule would create unnecessary costs and operational disruptions (noting Carrier Global Corporation has estimated that approximately 360,000 road TRUs in the United States contain 15-18 pounds HFC refrigerant at full charge and subjecting these units to these requirements could result in at least $330 million in annual cost and at least $5.8 billion in present value cost).
- Road and intermodal container TRUs are essential to the United States supply chain (refrigerated trucks, trailers, and intermodal containers help insure that food, medicine, and other temperature-sensitive products reach consumers safely and efficiently. Availability of rental and leased refrigerated equipment is especially important for businesses that experience seasonal demand, temporary capacity needs, emergency response situations, or supply chain disruptions).
- EPA correctly recognizes that TRUs should be treated differently than stationary appliances (existing leak repair framework requires information and procedures that are not practical for mobile equipment which includes location-based record keeping and inspection requirements).
- EPA should avoid creating incentives that could increase inefficiency or emissions (if manufacturers, owners, or operators are forced to re-design or operate equipment to simply remain below a 15-pound charge threshold that could reduce equipment efficiency, impair cooling performance, and increase fuel consumption).

A copy of the comments can be found here.