TRALA

TRUCK RENTING AND LEASING ASSOCIATION

July 10, 2026

U.S. Environmental Protection Agency
EPA Docket Center
Office of Air and Radiation

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Re: Comments on Proposed Rule~~:~~ *Phasedown of Hydrofluorocarbons: Excluding Road and Intermodal Container Transport Refrigeration Units from HFC Leak Repair Requirements*
Docket ID: EPA-HQ-OAR-2026-2905

To Whom It May Concern:

On behalf of the Truck Renting and Leasing Association (TRALA), I write to express strong support for EPA's proposed rule to exclude road and intermodal container transport refrigeration units (TRU) from the HFC leak repair requirements under 40 C.F.R. § 84.106.

Founded in 1978, TRALA is a national trade association representing the interests of approximately 475 truck renting and leasing companies and nearly 100 supplier companies. TRALA serves as the unified voice for the entire truck renting and leasing industry, advocating on its members' behalf at both the federal and state levels. The truck renting and leasing industry provides 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. Many TRALA members rent, lease, maintain, service, or otherwise support refrigerated trucks, trailers, and related transportation equipment that are critical to the movement of food, pharmaceuticals, medical supplies, and other temperature-sensitive goods. TRALA members purchase more than 30% of all new over-the-road Class 3-8 trucks and tractors manufactured in the United States each year.

TRALA 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. TRALA supports EPA's proposal to clarify that road and intermodal container TRUs are excluded from the requirements of 40 C.F.R. § 84.106, regardless of charge size, and urges EPA to finalize the rule immediately.

I. EPA Should Finalize the Exclusion for Road and Intermodal Container TRUs

TRALA supports EPA's proposal because road and intermodal container TRUs are mobile transportation equipment, not stationary appliances. These units operate in a fundamentally different environment than fixed refrigeration systems. TRUs move across state lines, are frequently in the possession of customers, may be serviced by different maintenance providers depending on where the equipment is located, and are often used in time-sensitive operations where equipment availability is critical.

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Applying stationary ~~-~~equipment leak repair requirements to mobile road and intermodal container TRUs would create significant compliance burdens without a corresponding environmental benefit. Refrigerated equipment is already subject to strong operational and commercial incentives to remain in proper working order. A malfunctioning TRU can place temperature-sensitive cargo at risk, including perishable food and pharmaceutical products. ~~For this reason,~~ O~~o~~wners, lessors, lessees, and maintenance providers already have every incentive to monitor, maintain, and promptly repair refrigerated equipment to protect customer loads and ensure supply chain reliability.

EPA’s proposed exclusion is therefore a practical and appropriate clarification. TRALA urges EPA to finalize the exclusion for all road and intermodal container TRUs, regardless of whether a particular unit has a full charge above or below 15 pounds.

II. The Current Leak Repair Requirements Are Ill-Suited for Rental and Leasing Operations

The rental and leasing business model makes application of the leak repair requirements especially difficult. Unlike stationary refrigeration systems, rented and leased TRUs are frequently not in the continuous possession or control of the equipment owner. In long-term lease arrangements, equipment may remain with a customer for extended periods of time and may be operated in multiple jurisdictions. In shorter-term rental arrangements, equipment may move quickly between customers and locations depending on demand.

This mobility creates significant compliance challenges. The leak repair requirements include obligations related to leak rate calculations, repair timelines, verification testing, follow-up inspections, and recordkeeping. These requirements may be workable for stationary systems located at a fixed facility, but they are poorly suited to TRUs that are constantly moving and may be serviced by different providers over time.

For rental and leasing companies, compliance could require removing equipment from service, locating and recalling units that are already rented or leased, coordinating with customers, tracking records from multiple maintenance providers, and substituting equipment where available. In some cases, replacement equipment may not be available, particularly during seasonal demand spikes or in regions where refrigerated equipment is limited. These burdens could lead to avoidable downtime, increased costs, and disruptions for customers that depend on refrigerated vehicles and trailers to move essential goods.

III. The Rule Would Create Unnecessary Costs and Operational Disruptions

TRALA is concerned that applying the leak repair requirements to road and intermodal container TRUs would impose significant costs on the transportation sector and the broader supply chain. Carrier Global Corporation has estimated that approximately 360,000 road TRUs in the United States contain between 15 and 18 pounds of HFC refrigerant at full charge and that subjecting these units to the leak repair requirements could result in at least $333 million in annual costs and at least $5.8 billion in present value costs.

Those costs are not limited to equipment owners or manufacturers. They would ultimately affect fleets, rental and leasing companies, shippers, retailers, food distributors, pharmaceutical companies, and consumers. Compliance costs associated with monitoring, recordkeeping, inspections, downtime, equipment substitution, and repair verification would likely be passed through the supply chain, increasing the cost of transporting temperature-sensitive goods.

For TRALA members, downtime is particularly concerning. Refrigerated trucks and trailers are revenue-generating assets that must remain available to meet customer demand. Taking units out of service for administrative or verification requirements that are not tailored to mobile equipment could reduce fleet availability and make it more difficult for businesses to access refrigerated equipment when they need it.

IV. Road and Intermodal Container TRUs Are Essential to the U.S. Supply Chain

TRUs play a critical role in the movement of essential goods. Refrigerated trucks, trailers, and intermodal containers help ensure that food, medicine, and other temperature-sensitive products reach consumers safely and efficiently. The 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.

TRALA members help provide that flexibility. Rental and leasing companies allow businesses to access refrigerated equipment without purchasing permanent capacity that may not be needed year-round. This is especially important for small and medium-sized businesses, food distributors, grocers, agricultural producers, medical suppliers, and other entities that depend on reliable refrigerated transportation.

Imposing unnecessary regulatory burdens on TRUs could reduce equipment availability and increase costs across this critical segment of the supply chain. EPA's proposed exclusion would help avoid these unintended consequences while maintaining the existing commercial incentives that already support proper maintenance and prompt repair of refrigerated equipment.

V. EPA Correctly Recognizes That TRUs Should Be Treated Differently Than Stationary Appliances

TRALA agrees with EPA that road and intermodal container TRUs warrant different treatment from stationary refrigeration appliances. The existing leak repair framework requires information and procedures that are not practical for mobile equipment, including location-based recordkeeping and inspection requirements. A stationary refrigeration appliance is located at a fixed facility. A TRU may be on the road, at a customer location, at a distribution center, in a repair shop, or moving across state lines.

In addition, TRUs may be maintained by a range of service providers depending on where the equipment is located and what service is needed. A single unit may be serviced by an in-house maintenance shop, an independent repair provider, a dealership, a contract maintenance provider, or another qualified technician. Consolidating those records for purposes of leak rate calculations and compliance tracking would impose a significant administrative burden that is not justified for this category of mobile equipment.

EPA has previously recognized that certain appliance categories should be excluded from the leak repair provisions where inclusion would create enforcement inefficiencies, administrative burdens, or strain on available technicians. Those concerns apply with equal, if not greater, force to road and intermodal container TRUs. The mobility of these assets, the time-sensitive nature of refrigerated freight, and the realities of rental and leasing operations all support EPA's proposed exclusion.

VI. EPA Should Avoid Creating Incentives That Could Increase Inefficiency or Emissions
TRALA is also concerned that maintaining the current threshold without a TRU exclusion could create unintended consequences. If manufacturers, owners, or operators were forced to redesign or operate equipment simply to remain below a 15-pound charge threshold, that could reduce equipment efficiency, impair cooling performance, and increase fuel consumption. For temperature-sensitive freight, reduced cooling capacity can also increase the risk of spoilage or cargo damage.

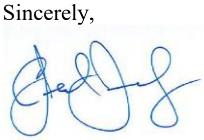
EPA should not create incentives that undermine the efficiency and reliability of refrigerated transportation equipment. Finalizing the proposed TRU exclusion would provide regulatory clarity while avoiding unintended operational and environmental consequences.

VII. Conclusion
TRALA strongly supports EPA's proposed rule to exclude road and intermodal container TRUs from the HFC leak repair requirements under 40 C.F.R. § 84.106. TRALA urges EPA to finalize the proposed exclusion as written and to make clear that road and intermodal container TRUs are not subject to the leak repair requirements, regardless of charge size.

This clarification is necessary to avoid imposing stationary-equipment requirements on mobile transportation assets that are essential to the movement of food, pharmaceuticals, and other temperature-sensitive goods. Finalizing the proposed exclusion will reduce unnecessary compliance burdens, protect refrigerated equipment availability, support supply chain reliability, and prevent avoidable costs from being passed on to businesses and consumers.

Thank you for the opportunity to submit comments on this important proposal. TRALA appreciates EPA's attention to this issue and stands ready to work with the Agency as it finalizes this rule.

Sincerely,



C. Jake Jacoby
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