

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

MAR - 4 2015

OFFICE OF AIR AND RADIATION

Mr. Roderick Dayton President Ricconics Innovation Corporation, LLC 17991 Englewood Drive Middleburg Heights, Ohio 44130

Dear Mr. Dayton:

The U.S. Environmental Protection Agency (EPA) has reviewed your request to verify the Radius 3520 trailer skirt and Radius 3523 trailer skirt for line-haul, heavy-duty truck trailers. These two devices are designed to independently increase the aerodynamic efficiency of trailers to improve the overall fuel economy of the combination tractor-trailer (they should not be used together). Based upon your application, test data and supporting information, EPA hereby verifies the Radius 3520 and Radius 3523 trailer side skirts the level described below.

Technology	Test Method (s)	Verification Category (Fuel Savings)
Radius 3520 Trailer Side Skirt	Wind Tunnel (1/8 scale)	4% Trailer Device (4% savings or higher)
Radius 3523 Trailer Side Skirt	Wind Tunnel (1/8 scale)	4% Trailer Device (4% savings or higher)

Verified performance of these devices is based on use with a 53 foot, "dry" box trailer traveling at highway speeds and in the tested configuration. Verified aerodynamic devices are intended for use on 53 foot "dry" box and/or 53 foot refrigerated trailers where appropriate. The application of some devices or systems may not be appropriate for all trailer configurations. For example some aerodynamic end fairings may not be compatible with roll up doors and front end fairings (or gap reducers) are not appropriate for refrigerated trailers. Verified technology(s) and technology system(s) must be evaluated by the manufacturer to confirm that installations would be appropriate for the intended applications and that any modifications to the verified technology will not impact aerodynamic performance.

EPA verification is contingent upon devices being installed and maintained as they were tested. Minimal modifications to aerodynamic devices necessary for certain installations, such as a hole to accommodate a fuel filler neck or cut out for lighting, is only appropriate with written instructions and approval and the manufacturer. Technology manufacturers must evaluate and approve all installation modifications and confirm that the modification would have minimal impact on the technology's fuel savings performance. Any significant change(s) to the technology(s) from the EPA-tested installation and/or design 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 verifies aerodynamic trailer devices and device combinations for use on EPA-designated SmartWay Trailers and SmartWay *Elite* Trailers. EPA-verified aerodynamic device(s) that achieve a minimum of 5% total fuel savings – used with EPA-verified low rolling resistance tires – qualify a 53 foot "dry" box or refrigerated trailer for designation as a SmartWay Trailer. Now as a new addition to the SmartWay program, device combinations that achieve a minimum of 9% total fuel savings – used with low rolling resistance tires – will qualify for designation as a SmartWay *Elite* Trailer.

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.

This technology will be listed on the EPA's verified aerodynamic product website at: http://www.epa.gov/smartway/forpartners/technology.htm

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

http://www.epa.gov/smartway/forpartners/index.htm or contact Joann Jackson-Stephens at jackson-stephens.joann@epa.gov.

Finally, if you're not already a member, you may wish to join the SmartWay Community. This is designed for businesses that share our commitment to reducing emissions and fuel consumption in freight movement. If you want to learn more about the SmartWay Community, read more at http://www.epa.gov/smartway/forshippers/index.htm, and Patrice Thornton, at thornton.patrice@epa.gov, can assist you with questions you may have regarding joining the SmartWay Community.

If you have any questions regarding your verification or the program, please feel free to contact our aerodynamic technology staff person, Julie Hawkins, at hawkins.julie@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