



April 7, 2020

Dear Sir / Madam:

Wabash is based in Lafayette, Indiana and is the leading United States manufacturer of a variety of types of semi-trailer and tank trailers. Wabash has manufacturing operations in a number of states, including a facility in Little Falls, Minnesota that specializes in the manufacture of molded structural composite (“MSC”) truck trailers using a technology/product called Prisma Composite Preforms which contains small amounts of HFC 134-a foam. The Little Falls Facility currently employs approximately 65 individuals.

A few years ago, Wabash invested in an existing manufacturing facility in Little Falls, which was previously the Larson Boat Group and was set to close. Wabash selected the Little Falls location as the launch facility for MSC products because of the unique combination of an experienced and highly skilled workforce in composite manufacturing process, along with a fully-equipped and highly-engineered facility capable of producing large-size parts at high rates of volume. Wabash has made a total capital investment in Little Falls of \$25 million and is scheduled to invest several million more into this facility over the next few years.

For MSC trailers, a small amount of HFC foam is necessary for strength and structural soundness associated with this structural composite technology. Despite significant investments and testing, a suitable alternative has not been identified. If the HFC ban is applied to Wabash’s MSC trailers produced in Little Falls, it would result in substantial economic impacts, including likely forcing Wabash to shut down all production and the cutting of approximately 65 jobs. At a time when other companies are cutting costs by moving jobs outside the United States, Wabash is investing in building trailers and creating jobs in the U.S.

We have read Structural Composites / Compsys, Inc’s comments on pending regulation of 134a. We agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested. Many of our applications are critical interstate commerce so the bill needs to be preemptive to state regulation.

Thank you,

**Mark Ehrlich**  
Sr. Director Engineering

**Wabash National**  
Commercial Trailer Products