

- a. Rail car TRUs – both sides of the rail car. Railroads have requested they not be required to apply the IDN or railcar’s reporting mark to the TRU housing because the TRU is sometimes located inside a protective outer wall, such that a number on the TRU housing would not be visible from most angles. ARB believes this is practical and therefore will allow this practice, but only under the proviso that if the TRU is replaced, the owner shall be required to revise the IDN information within 30 days to reflect all of the unit, engine, and compliance status information for the replacement TRU (ref. 13 CCR 2477, subsection (e)(E)1.c.I. and (f)(1)(A)2.)
 - b. Domestic shipping container TRUs - both sides of the shipping container. Note that domestic shipping containers are equipped with refrigeration systems powered by integral internal combustion engines.
 - c. TRU gensets – both sides of TRU/TRU genset housing.
2. Letters and numbers shall contrast sharply in color with the color of the background surface on which the letters and numbers are placed.
 3. Letters and numbers shall be readily legible during daylight hours, from a distance of 50 feet (15.24 meters) while unit is stationary.
 4. Marking shall be kept maintained in a manner that retains the legibility required above.

This pilot program may be suspended by ARB if the affected fleets fail to meet the above terms and conditions or the enforceability of the affected TRU ATCM subsections is challenged.

Company equipment numbers are not allowed in place of ARB IDNs because these numbers are not truly unique across all companies. There is no company code prefix that is assigned by an international organization to go with the subsequent company equipment number that would make the combined number unique.

Related Issues:

- I. TRU genset owners have indicated they may use color-coded stickers to help them identify units that meet the TRU ATCM’s in-use performance standards. ARB inspectors will disregard such markings and may conduct inspections to verify compliance.
- II. TRU and TRU genset fleets have requested the ability to apply for ARB IDNs for multiple units using electronic batch uploads via the Internet. ARB is planning to allow this, provided information is submitted in the proper format, and is complete and accurate. Please see Advisory 08-06 (coming soon) for these requirements.
- III. Rental and lease TRUs and TRU gensets must follow special procedures that are described in Advisory 08-04 (coming soon).
- IV. Financial Institutions that hold title as legal owners of TRUs or TRU generator sets and lease this equipment (as lessors), but contractually assign all legal responsibility for complying with laws to the lessee (including the responsibility for ARB IDN applications and compliance with the in-use performance standards) must follow Advisory 08-04.

Other regulatory advisories may be found at: <http://www.arb.ca.gov/diesel/tru/advisories.htm>

For more information

To obtain a copy of the regulation or other related compliance assistance documents, visit the TRU website at <http://www.arb.ca.gov/diesel/tru/tru.htm>. Additional questions may be addressed by calling the toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM).

If you require special accommodation or language needs, please call 1-888-878-2826 or email tru@arb.ca.gov. TTY/TDD/Speech users may dial 711 for a California Relay Service.