



## TRU Advisory: 08-08 Biodiesel

The purpose of this advisory is to clarify that biodiesel cannot be used to comply with the TRU ATCM. As of this update, **biodiesel has not been verified as a diesel emission control strategy and cannot be used as an Alternative Technology under the TRU ATCM.**

### Background

The Transport Refrigeration Unit (TRU) Airborne Toxic Control Measure (ATCM) (title 13 California Code of Regulations (13 CCR), section 2477) requires owners to bring their TRU and/or TRU generator set<sup>1</sup> (genset) engines into compliance with in-use performance standards. There are two levels of stringency for these in-use performance standards. The Low-Emission TRU In-Use Performance Standard (LETRU) reduces diesel particulate matter (PM) by at least 50 percent. The Ultra-Low-Emission TRU In-Use Performance Standard (ULETRU) reduces diesel PM by at least 85 percent. In-use performance standard compliance dates are phased in, based on the engine model year (MY).<sup>2</sup>

Alternative Technologies can be used to meet the LETRU and ULETRU In-Use Performance Standards if diesel PM emissions are eliminated while at all distribution facilities<sup>3</sup>. The TRU ATCM allows compliance to be achieved if the TRU is fueled exclusively with an alternative diesel fuel that has been verified by ARB as a VDECS<sup>4</sup>, provided the alternative diesel fuel contains no conventional diesel fuel or CARB diesel fuel.

As stated above, **biodiesel has not been verified as a VDECS and therefore cannot be used as an Alternative Technology compliance option for the TRU ATCM.** Verification of biodiesel must be done in accordance with Verification Procedures, Warranty and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines<sup>5</sup> (Verification Procedure). The Verification Procedure requires a multimedia assessment (MMA) to be conducted on alternative diesel fuels and fuel additives, including biodiesel, and the California Environmental Policy Council (EPC) must determine that use of the fuel will not cause a significant adverse impact on the public health or the environment. The MMA is now being conducted. Preliminary results show that there are continuing concerns related to nitrogen oxide (NOx) emissions, which are greater with biodiesel fuel as compared to conventional diesel fuel. Under the Verification Procedure, NOx emissions for a diesel emissions control strategy must not increase more than 10 percent, compared to NOx emissions from a baseline engine and conventional diesel fuel. Exceeding the 10 percent NOx limit would mean that biodiesel could not qualify for verification as a VDECS. NOx is a concern because it is an ozone precursor and many areas of the State have unhealthy levels of ozone.

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<sup>1</sup> Hereinafter, the use of the term TRU also indicates TRU generator sets, unless otherwise specified.

<sup>2</sup> See the compliance schedule at the TRU Website at: <http://www.arb.ca.gov/diesel/tru/tru.htm>.

<sup>3</sup> Ref. 13 CCR, section 2477 (e)(1)(A)3.

<sup>4</sup> VDECS stands for Verified Diesel Emissions Control Strategy.

<sup>5</sup> Ref. 13 CCR, section 2700-2710.

**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](mailto:tru@arb.ca.gov). TTY/TDD/Speech users may dial 711 for a California Relay Service.

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