



TRU Advisory: 09-17 Compliance Requirements for TRUs Based Outside California

Background

At its February 2004 public hearing, the California Air Resources Board (ARB) approved the *Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate* (TRU ATCM). The TRU ATCM is designed to accelerate the cleanup of existing (in-use) TRUs and TRU generator sets through retrofit with verified diesel emission control strategies (VDECS), engine repowers, use of Alternative Technologies, or unit replacements.¹ The TRU ATCM's in-use standards are phased in over about 15 years and will reduce diesel particulate matter (PM) emissions from in-use TRU and TRU generator set engines that operate in California. Hereinafter, any reference to TRUs includes TRU generator sets.

Does the TRU ATCM apply to TRUs based outside of California?

Yes, any TRU that operates in California, including those based outside of California, will need to meet California's in-use performance standards on the same schedule as California-based² TRUs. Owners of TRUs based outside of California may voluntarily register their TRUs with ARB to get ARB identification numbers (IDN) and compliance certification pages for their units.

I have TRUs that are based outside of California and operate in California, but I don't have any terminals³ in California where TRUs are assigned. What do I need to do to be in compliance?

- a) Owner/operators are responsible for making sure that all of the TRUs they operate in California comply with the TRU ATCM. TRUs that operate in California must comply with the in-use performance standards shown in Tables 1 and 2 by the compliance dates shown in Table 3.
- b) Owners of non-California-based TRUs may voluntarily register their TRUs in ARB's Equipment Registration (ARBER) system to get ARB IDNs and compliance certification pages for TRUs that operate in California periodically. IDNs will speed up inspections at border crossings, scales, distribution centers, and truck stops. Compliance certification pages may be used to show compliance with the in-use performance standards. There is no deadline for IDN applications for non-California-based TRUs.

**Table 1
Low-Emission In-Use Performance Standards (LETRU)**

Horsepower	Engine Certification	Verified Diesel Emission Control Strategy Retrofit
Less than 25	0.30 gram per hp-hr	Level 2 or better (at least 50% PM reduction)
25 or greater	0.22 gram per hp-hr	Level 2 or better (at least 50% PM reduction)

**Table 2
Ultra-Low Emission In-Use Performance Standards (ULETRU)**

Horsepower	Engine Certification	Verified Diesel Emission Control Strategy Retrofit
Less than 25	Not Applicable – use other option	Level 3 (at least 85% PM reduction)
25 or greater	0.02 gram per hp-hr	Level 3 (at least 85% PM reduction)

¹ These compliance options are discussed in compliance assistance documents that are posted on the TRU website at: <http://www.arb.ca.gov/diesel/tru/tru.htm> in the "Compliance Assistance" section.

² "California-based TRUs and TRU generator sets" means a TRU-equipped truck, trailer, shipping container, railcar or TRU gen set that a reasonable person would find to be regularly assigned to terminals within California

³ "Terminal" means any place where a TRU or TRU gen set equipped truck, trailer, shipping container, railcar or TRU gen set is regularly garaged, maintained, operated, or dispatched from, including a dispatch office, cross-dock facility, maintenance shop, business, or private residence.

**Table3
In-Use Performance Standard Compliance Schedule for TRUs and TRU Generator Sets**

Engine Model Year	Compliance Date for LETRU Standard	Compliance Date for ULETRU Standard
2001 or older	December 31, 2008 (See Note 1)	December 31, 2015 (See Note 2)
2002	December 31, 2009	December 31, 2016 (See Note 3)
2003	December 31, 2010	December 31, 2017
2004 (<25 hp)	December 31, 2011	December 31, 2018
2004 (≥25 hp)	Skip to ULETRU	December 31, 2011
2005 and Subsequent	Skip to ULETRU	December 31st of the model year + 7 years

Note 1: The compliance date for model year 2001 and older engines to meet the low-emission standard was delayed until December 31, 2009.

Note 2: The ULETRU compliance date may be extended one year if LETRU was met by 12-31-2009 and two years if LETRU was met by 12-31-2008

Note 3: The ULETRU compliance date may be extended one year if LETRU was met by 12-31-2009.

Is Electric Standby (E/S) a good compliance option for TRUs that are based out-of-state?

E/S-equipped TRUs and hybrid electric TRUs are Alternative Technologies that qualify to meet the Ultra-Low-Emission TRU (ULETRU) in-use performance standard **only if the TRU is not operated under diesel engine power while at a facility**, except during an emergency⁴ and other narrow exceptions. See [Regulatory Guidance for Electric Standby and Hybrid Electric Alternative Technology Compliance Strategies](#) for details. Qualifying E/S to be an Alternative Technology would be very difficult for a carrier that is delivering to distribution centers that they do not own. If a TRU owner cannot make arrangements at every California facility they deliver to for a compatible electric power plug, then they should not consider E/S as a viable compliance option.

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.

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⁴ "Emergency" means any of the following times:

- (A) A failure or loss of normal power service that is not part of an "interruptible service contract" (see definition in section 2477.4);
- (B) A failure of a facility's internal power distribution system, provided the failure is beyond the reasonable control of the operator;
- (C) When an affected facility is placed under an involuntary "rotating outage" (see definition in section 2477.4).
- (D) When the President of the United States or the Governor of the State of California declares a state of emergency related to any type of disaster where TRU-equipped trucks or trailers provide foodservice to incident responders, including but not limited to, forest fires and earthquakes.
- (E) When the National Interagency Fire Center dispatches mobile catering service businesses with TRU-equipped trucks or trailers to provide foodservice to incident responders located in California.