



TRU Advisory: 10-19 CHANGES TO COMPLIANCE REQUIREMENTS FOR MODEL YEAR 2003 TRU ENGINES

Background

The Air Resources Board (ARB or Board) staff is proposing to amend the in-use performance standard that model year (MY) 2003 transport refrigeration units (TRU) must comply with by December 31, 2010. Currently, 2003 MY engines must meet the ultra-low emission TRU (ULETRU) in-use standard requirement by December 31, 2010. The proposed amendments would change that requirement and require all 2003 MY engines to meet the low emission TRU (LETRU) in-use standard or use an approved Alternative Technology.¹ This advisory provides guidance to owners/operators of MY 2003 TRUs on what actions they should take now to comply with the proposed amendments.

Why is ARB proposing to change the compliance requirements for MY 2003 engines?

Currently, the Level 3 retrofit systems needed to meet the ULETRU standards are not readily available in the marketplace (as of June 2010). The proposed amendments to the TRU Airborne Toxic Control Measure (ACTM) would change the in-use emission standards for MY 2003 engines from ULETRU to LETRU. LETRU emission standards can be achieved by installing a readily available Level 2 verified diesel emissions control system (VDECS). This LETRU emission standard would need to be met by December 31, 2010. Staff is further proposing that a MY 2003 engine that comes into compliance with the LETRU standard would not have to comply with the ULETRU standard for seven years. Table 1 shows the proposed revision to the in-use emission standards for MY 2003 engines.

Table 1
Proposed Revised In-Use Performance Standards and Compliance Dates for MY 2003 Engines

Engine MY	LETRU	ULETRU
2003	December 31, 2010	December 31, 2017

When will the proposed amendments be approved?

The proposed TRU ATCM amendments discussed above are scheduled for action by our governing Board in November 2010. ARB staff anticipates that the Board will approve these amendments and that they will become effective spring 2011.

What are my compliance options if I have a MY 2003 engine?

MY 2003 TRU engine owners are advised that the TRU ATCM's compliance deadline of December 31, 2010, is still in effect until these amendments are approved by our Board. However, because compliance options for the ULETRU standard are currently limited, staff has determined that an acceptable compliance action for owners of MY 2003 engines would be to allow them to meet the LETRU emission standard by installing a Level 2 VDECS by December 31, 2010. Alternatively, if Level 3 VDECS were to become available sooner than expected, owners could still comply with the regulation by installing the Level 3 device by December 31, 2010. In this case, the owner of the MY 2003 engine would be in full compliance with the regulation's ULETRU standards. Another compliance option would be to replace the MY 2003 engine with a 2004 or later MY engine. However, if this engine replacement option is chosen, the ULETRU emission standards would have to be met by December 31st of the seventh year after the replacement engine's model year (or effective model year in the case of a prior-tier engine). Finally, as mentioned above, owners may also comply with the in-use performance standards by using an Alternative Technology.

¹ See 13 CCR 2477, subsection (e)(1)(A)3. Includes electric standby or hybrid-electric equipped TRUs, or hybrid cryogenic equipped TRUs.

What actions should I take to bring a MY 2003 engine into compliance by December 31, 2010?

Owners of MY 2003 engines need to take the following immediate actions:

1. Decide the preferred compliance option: LETRU, ULETRU, replacement engine, or replace with an Alternative Technology;
2. Purchase equipment now to ensure delivery and installation by December 31, 2010; and
3. Register the affected TRU unit(s) in the Air Resource Board Equipment Registration System (ARBER) if California-based. If the unit has already been registered, log-in to the ARBER website (<https://arber.arb.ca.gov/welcome.arb>) and make the necessary changes so that the system can update your compliance status.

What are the in-use compliance requirements if a TRU has a unit manufacture year of 2004 and the engine is a MY 2003 TRU engine rated greater than 25 hp?

TRU Advisory 08-01 is still applicable and allows the owner to use the unit manufacture year instead of the engine model year if there is only one year difference between the unit manufacture year and the engine MY. The owner could use the unit manufacture year of 2004. In this case, the compliance date would be December 31, 2011. However, choosing 2004 would also commit the owner to complying with ULETRU by December 31, 2011. If a VDECS for the specific engine family were not available, other actions, such as repowering with a Tier 4i engine or replacing the unit, could be taken. The owner could elect to use the engine MY and comply with the LETRU emission standard by December 31, 2010, as allowed by this advisory.

What are the compliance requirements and dates if the TRU was manufactured in 2003 and the engine is MY 2002?

Since the December 31, 2009, compliance date for MY 2002 has passed, the owner in effect has chosen to use the 2003 unit manufacture date to determine the compliance date and requirements (applying TRU Advisory 08-01). The owner could comply with the LETRU requirements by retrofitting the MY 2002 engine with a Level 2 VDECS as allowed by this advisory. Alternatively, the owner could install a new replacement engine, but the replacement engine would need to meet ULETRU by December 31st of the seventh year after the engine model year.

Are the compliance dates changing for MY 2002 and older engines?

Table 2 shows the LETRU compliance dates for MY 2002 and older engines. These dates have not changed. Owners of noncompliant units are urged to bring these units into compliance as soon as possible to avoid enforcement action with penalties up to \$1,000.

Table 2
In-Use Performance Standard Compliance Schedule

Engine MY	Compliance Date for Meeting LETRU
2001 & older	December 31, 2008 ²
2002	December 31, 2009

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 need this document in an alternative format or another language, 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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² Enforcement delayed until December 31, 2009.