

TRU ATCM

Zero-Emission Truck TRU Requirement Frequently Asked Questions

Last Updated November 2023

This document contains frequently asked questions and answers on the zero-emission truck transport refrigeration unit requirement in 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)*. Beginning December 31, 2023, and each year thereafter, TRU owners are required to turnover at least 15 percent of their truck TRU fleet to zero-emission technology. All truck TRUs operating in California are required to be zero-emission by December 31, 2029.

While this document is intended to assist with compliance efforts, it is the sole responsibility of each regulated entity to ensure compliance with the TRU ATCM. For more information on the TRU ATCM, visit <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit>. If you have questions, email arber@arb.ca.gov or call the TRU Help Line at 1-888-878-2826.

Who does the zero-emission truck TRU fleet requirement apply to?

Owners (or owner/operators) of truck TRUs that operate in California. Truck TRUs are diesel-powered refrigeration units that are mounted on or in a truck cargo box that is permanently attached to a truck, in contrast to a detachable trailer.

What should truck TRU owners do in preparation for the zero-emission fleet requirement?

TRU owners should ensure their ARBER account is updated (e.g., remove truck TRUs that are no longer in service or do not operate in California), as the number of required zero-emission truck TRUs is based on the fleet size reported in ARBER. TRU owners should order units and install supporting infrastructure in advance of compliance dates, taking into consideration delivery and installation times.

What is the compliance schedule for the zero-emission truck TRU fleet requirement?

The zero-emission truck TRU fleet requirement begins December 31, 2023. However, the first compliance date for a given fleet is based on the truck TRU fleet size. TRU owners are required to turnover 15 percent of their fleet to zero-emission each year and use basic rounding methodology when calculating the required number of zero-emission units. The table below shows the required number of zero-emission truck TRUs for different size fleets.

Compliance Deadline	Fleet w/ 1 Truck TRU	Fleet w/ 2 Truck TRUs	Fleet w/ 3 Truck TRUs	Fleet w/ 4 Truck TRUs	Fleet w/ 5 Truck TRUs	Fleet w/ 6 Truck TRUs	Fleet w/ 7+ Truck TRUs
12/31/23	0	0	0	1	1	1	15%
12/31/24	0	1	1	1	2	2	30%
12/31/25	0	1	1	2	2	3	45%
12/31/26	1	1	2	2	3	4	60%
12/31/27	1	2	2	3	4	5	75%
12/31/28	1	2	3	4	5	5	90%
12/31/29+	1	2	3	4	5	6	100%

What if there are manufacturer delays or compliant technology is not available prior to the compliance deadlines?

TRU owners may apply for a one-time six month compliance extension based on delays due to private financing, equipment manufacture, or installation (equipment must be ordered at least six months prior to the compliance deadline).

Additionally, if suitable technology is not available within six months of a compliance deadline, TRU owners may apply for a one-year compliance extension based on the unavailability of compliance technology. For compliance extension forms, visit <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/forms/tru-compliance-extension-application>.

What if I cannot install fueling infrastructure prior to the zero-emission truck TRU fleet requirement compliance deadlines?

TRU owners may apply for an annual compliance extension, up to a maximum of two years, for the zero-emission truck TRU fleet requirement based on delays due to the installation of zero-emission infrastructure at the facility at which the truck TRU fleet is domiciled (e.g., a

delay in obtaining construction permit(s), a delay in obtaining power from a utility, etc.). The TRU owner is required to apply at least 12 months prior to the compliance deadline if the delay is due to a utility infrastructure upgrade, and at least 3 months prior for all other delay types. For compliance extension forms, visit <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/forms/tru-compliance-extension-application>.

What is the overlap between the zero-emission truck TRU requirement and the zero-emission vehicle requirements in the Advanced Clean Fleet Regulation (ACF)?

All truck TRU fleets operating in California are subject to the zero-emission truck TRU fleet requirement. The zero-emission truck TRU requirement is phased in at 15 percent per year beginning December 31, 2023. All truck TRUs operating in California are required to be zero-emission by December 31, 2029.

In contrast, only drayage, high priority (\$50 million or more in gross annual revenues, or that own, operate, or have common ownership or control of a total of 50 or more vehicles), and state and local government agency truck fleets are subject to ACF. ACF zero-emission requirements begin in 2024. Existing combustion-powered trucks may continue to operate for their full useful life (the earlier of 18 years or 800,000 miles or 13 years if the truck has over 800,000 miles).¹ For more information on ACF and other truck regulations, visit <https://ww2.arb.ca.gov/sites/default/files/truckstop/truckstop.html>.

I want to install a zero-emission TRU on a zero-emission truck, but there are no zero-emission trucks available for purchase. Can I receive an extension for the zero-emission truck TRU requirement?

Zero-emission truck TRUs for use with electric trucks are available for order now. There are over 20 zero-emission box truck models commercially available. Additionally, some zero-emission truck models are eligible for funding through incentive programs, such as CARB's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP). For more information on HVIP and other funding programs, visit <https://ww2.arb.ca.gov/road-heavy-duty-funding-opportunities>.

TRU manufacturers are also developing zero-emission truck TRUs for use on diesel trucks and there are commercially-available cold plate and cryogenic technologies. If there are no

¹ Alternatively, high priority and state and local government fleets may elect to meet zero-emission vehicle targets as a percentage of the total fleet.

suitable compliance technologies available within six months of a compliance date, TRU owners may apply for an extension. TRU owners will have to provide documentation that no suitable technology is available (e.g., no zero-emission TRUs for use on diesel trucks are available, cold plate and cryogenic technologies are not suitable for fleet's operations, and no electric trucks are available). For more information on available zero-emission truck TRUs, visit <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/compliance-information/zero-emission-truck-tru>.

Is there incentive funding available for the purchase of zero-emission truck TRUs and supporting infrastructure?

For more information on TRU incentive funding, visit <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/tru-funding-assistance>. TRU owners should act early to take advantage of incentive funding, as most programs prohibit the use of funds to pay for regulatory compliance.