

TRU ATCM (with the 2022 Amendments) Frequently Asked Questions

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Table of Contents

TRU ATCM (with the 2022 Amendments) Frequently Asked Questions.....	1
Introduction and Disclaimer.....	1
General Questions & Applicability.....	2
1. Who must comply with the TRU ATCM?.....	2
2. Does the TRU ATCM apply to out-of-state-based TRUs?	2
3. Is there an exemption for TRUs that are rarely used?	2
4. When do new requirements begin?.....	2
TRU Owner/Operator Requirements.....	3
5. What requirements apply to owners/operators of TRUs?	3
6. What are the requirements for TRUs I lease and operate in California?	4
Reporting TRUs to CARB	5
7. When do the TRU reporting requirements begin?	5
8. How do I report a TRU to CARB?	5
9. How do I register multiple TRU units at one time?	5
10. Can operators report a TRU to CARB on behalf of an owner?.....	5
11. What if I no longer own a reported TRU or its information changes?.....	5
12. I have compliant units, but my company is not showing up on the 100% TRU ATCM Compliant Carrier List Search page when facilities search our company name. ...	6
TRU Operating Fees.....	6
TRU Compliance Labels.....	6
13. When does the TRU compliance label requirement begin?.....	6
14. When will I receive my TRU compliance labels?.....	6
15. How will I receive my TRU compliance labels?	6
16. Why did I get two TRU compliance labels for each of my units?.....	7
17. How long are the TRU compliance labels valid for?.....	7
Lower Global Warming Potential Refrigerant.....	7
18. When does the lower global warming potential refrigerant requirement begin?...	7

19. What TRU types does the lower global warming potential refrigerant requirement apply to?	7
20. Does the lower global warming potential refrigerant requirement apply to in-use TRUs?.....	7
21. How do I know if my TRU uses refrigerant that complies with the TRU ATCM?	7
PM Emission Standard	7
22. When does the PM emission standard requirement begin?	7
23. Does the PM emission standard apply to in-use TRUs?.....	8
24. Does the PM emission standard apply to truck TRUs?.....	8
25. How can I comply with the PM emission standard?	8
26. How do I know my TRU is equipped with an engine certified to meet the PM emission standard?.....	8
27. I plan to buy a hybrid-electric trailer TRU. Can I meet the PM emission standard using the Alternative Technology compliance option?.....	8
In-Use Performance Standard.....	8
28. Does the in-use performance standard apply to newly-manufactured non-truck TRUs?.....	8
29. I have a trailer TRU with a model year 2018 engine. When am I required to comply with the in-use performance standard?	9
30. How do I comply with the in-use performance standard?.....	9
31. Where can I find a list of Level 3 TRU VDECS that can be used to meet the in-use performance standard?	9
32. Can particulate filters damage TRU engines?.....	9
33. Do VDECS come with a warranty?.....	9
34. What do I do if my TRU VDECS has a failed trap?	10
35. What Alternative Technologies can be used to meet the in-use performance standard?	10
Zero-Emission Truck TRU Fleet Requirement	10
36. When does the zero-emission truck TRU fleet requirement begin?	10

37. What is the compliance schedule for the zero-emission truck TRU fleet requirement?.....	10
38. Does the zero-emission truck TRU requirement apply to trailer TRUs?.....	11
39. Does the zero-emission truck TRU requirement apply to the truck to which the refrigeration unit is mounted on?.....	11
40. 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?.....	11
41. What if I am unable to install infrastructure needed to support the use of zero-emission truck TRUs in time to meet the zero-emission truck TRU fleet requirement?.....	12
42. Can I downsize my truck TRU fleet instead of meeting the zero-emission truck TRU fleet percentage?.....	12
Applicable Facility Owner/Operator Requirements	12
43. What is an applicable facility?	12
44. When do the applicable facility owner/operator requirements begin?.....	13
45. What requirements apply to applicable facility owners/operators?.....	13
46. How do I register my applicable facility with CARB?	13
47. How do I pay applicable facility registration fees?.....	13
48. I own an applicable facility. How do I comply with the requirement to ensure TRU compliance?	13
49. How do I notify CARB of which compliance option I will be using?.....	13
50. If I choose option 1 to report all TRU activity to CARB, what information am I required to submit?.....	13
51. If I choose option 1 to report all TRU activity to CARB, when are reports due?	14
52. If I choose option 2 to only allow compliant TRUs to operate at my facility, how can I ensure a TRU is compliant with the TRU ATCM?	14
53. Can applicable facility owners/operators change which compliance option they will be using?.....	14
54. I do not own or control the TRUs that operate at my facility. Will I be cited if I allow non-compliant TRUs onto my property?.....	14

55. Why are applicable facility owners/operators subject to the TRU ATCM if TRUs are the source of the emissions?	15
56. If a facility's entry gate is not at the property line, trucks, similar with locomotives, must enter the facility prior to the first opportunity for a compliance inspection. A noncompliant unit being rejected would then be turned around and must travel within the facility again, to the exit gate. Is the facility liable for this travel?	15
TRU OEM Requirements	15
57. What requirements apply to TRU OEMs?.....	15
58. What information must be included in the TRU OEM monthly production reports? 15	
59. When are TRU OEM monthly production reports due?	16
60. Is there a TRU OEM monthly production report template?	16
61. How do I submit TRU OEM monthly production reports?.....	16
Vehicle Owner Requirements	16
62. When do vehicle owner requirements begin?	16
63. What requirements apply to vehicle owners?.....	16
Driver Requirements	16
64. When do driver requirements begin?.....	16
65. What requirements apply to drivers?.....	16
Freight Broker, Freight Forwarder, Motor Carrier, Shipper, and Receiver Requirements..	17
66. When do the freight broker, freight forwarder, motor carrier, shipper, and receiver requirements begin?.....	17
67. What requirements apply to freight brokers, freight forwarders, motor carriers, shippers, and receivers?	17
Extensions and Exemptions	17
68. I ordered a new TRU to comply with the TRU ATCM, but there is a bottleneck in the supply chain. Is there a compliance extension available for delays due to private financing, equipment manufacture delays, or installer delays?	17
69. My local utility said it will take 6 months to complete my request for an electrical service upgrade. Is there a compliance extension available for delays due to zero-emission fueling infrastructure?.....	18

70. Are TRUs used during emergency events exempt from the TRU ATCM?..... 18

71. I purchased a non-compliant TRU from out-of-state. Can I bring it to a repair shop in California to install a VDECS to comply with the TRU ATCM?..... 19

Enforcement.....20

72. What is the policy or process for violations of the TRU ATCM?.....20

73. What kind of penalties could result from violations of the TRU ATCM?.....20

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Introduction and Disclaimer

The California Air Resources Board (CARB) developed this Frequently Asked Questions (FAQ) document for 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; title 13, California Code of Regulations, section 2477) to describe the regulatory requirements in a user-friendly format. The TRU ATCM includes new amendments that were approved by the California Office of Administrative Law on July 18, 2022, and are effective October 1, 2022 (hereafter referred to as the 2022 Amendments). A fact sheet summarizing the 2022 Amendments is available on the [TRU FAQs webpage](#).

Unlike the TRU ATCM, this guidance document does not have the force of law. It is not intended to and cannot establish new mandatory requirements beyond those that are already in the TRU ATCM, and it does not supplant, replace, or amend any of the legal requirements of the TRU ATCM. Conversely, this document's omission or truncation of regulatory requirements does not relieve any regulated entity of their legal obligation to fully comply with all requirements of the TRU ATCM and is not intended as a substitute for reading the TRU ATCM.

CARB makes every effort to keep documents up to date. However, CARB does not guarantee the accuracy of this document and shall not be responsible for any errors or omissions in content. CARB reserves the right to make changes without notice.

You must ensure you have carefully reviewed and understand the TRU ATCM, as reliance on this FAQ is not a substitute for understanding and complying with the requirements of the TRU ATCM. Conformance with the TRU ATCM requirements is the responsibility of each regulated entity, as applicable. The full regulatory text of the TRU ATCM is available on the [CARB Rulemaking Activity webpage](#).

General Questions & Applicability

Unless otherwise specified, all references to TRUs include both TRUs and TRU generator sets; and all references to non-truck TRUs include trailer TRUs, domestic shipping container TRUs, railcar TRUs, and TRU generator sets.

1. Who must comply with the TRU ATCM?

The TRU ATCM applies to owners and operators of diesel-fueled TRUs and TRU generator sets that operate in California, irrespective of whether they are registered in or outside the State. This includes all motor carriers that transport perishable goods using diesel-powered refrigeration systems on trucks, trailers, shipping containers, and railcars that operate in California. The TRU ATCM also applies to TRU original equipment manufacturers (OEM); drivers of trucks or tractor-trailers that use TRUs or TRU generator sets and operate in California; freight brokers and freight forwarders; shippers, and receivers. The 2022 Amendments include new requirements that apply to owners and operators of facilities located in California where TRUs operate (applicable facilities), as well as vehicle owners of trucks or tractor-trailers that use TRUs or TRU generator sets and operate in California.

2. Does the TRU ATCM apply to out-of-state-based TRUs?

Yes, any TRU that operates in California, including out-of-state-based TRUs, are subject to the requirements of the TRU ATCM.

3. Is there an exemption for TRUs that are rarely used?

No, any TRU that operates in California, including those that are rarely used, are subject to the requirements of the TRU ATCM.

4. When do new requirements begin?

Reporting requirements for all California-based TRUs were included in the original regulation and went into effect July 31, 2009. Requirements for drivers, freight brokers, freight forwarders, motor carriers, shippers, and receivers were included in the 2011 amendments and went into effect January 1, 2013. For model year 2014 and older truck TRU engines and model year 2022 and older non-truck TRU engines, compliance with the ultra-low-emission (ULETRU) in-use performance standard is required seven years after the engine model year.

New requirements, as a result of the 2022 Amendments, begin on the dates shown in Table 1.

Table 1: Compliance Dates for New Requirements in 2022 Amendments

Compliance Start Date	Regulatory Requirement
December 31, 2022	Lower global warming potential refrigerant (newly-manufactured truck TRUs, trailer TRUs, and domestic shipping container TRUs)
December 31, 2022	PM emission standard (newly-manufactured non-truck TRUs)
December 31, 2023	Applicable facility registration and TRU compliance
December 31, 2023	Reporting of out-of-state-based TRUs to CARB
December 31, 2023	TRU compliance labels
December 31, 2023	Zero-emission truck TRU fleet requirement (15 percent/year)

TRU Owner/Operator Requirements

5. What requirements apply to owners/operators of TRUs?

The regulatory requirements that apply to the owner/operator of a TRU are dependent on the type of TRU and whether it is in-use (model year 2022 and older) or newly-manufactured (model year 2023 and newer). Table 2 summarizes the regulatory requirements that apply to each type of TRU. More information on each regulatory requirement is provided below.

Table 2: TRU Owner/Operator Requirements by TRU Type

TRU Type	Report to CARB (California-Based: Now Out-of-State- Based: 12/31/23)	TRU Compliance Labels (12/31/23)	Lower Global Warming Refrigerant (12/31/22)	PM Emission Standard (12/31/22)	In-Use Performance Standard (7 years after engine model year)	Zero- Emission Fleet Requirement (12/31/23)
In-Use Truck TRU ¹	ü	ü			✓ (model year 2014 and older)	ü
New Truck TRU ²	ü	ü	ü			ü
In-Use Trailer TRU ¹	ü	ü			ü	
New Trailer TRU ²	ü	ü	ü	ü		

¹ Model year 2022 and older.

² Model year 2023 and newer.

TRU Type	Report to CARB (California-Based: Now Out-of-State- Based: 12/31/23)	TRU Compliance Labels (12/31/23)	Lower Global Warming Refrigerant (12/31/22)	PM Emission Standard (12/31/22)	In-Use Performance Standard (7 years after engine model year)	Zero-Emission Fleet Requirement (12/31/23)
In-Use Domestic Shipping Container TRU ³	ü	ü			ü	
New Domestic Shipping Container TRU ⁴	ü	ü	ü	ü		
In-Use Railcar TRU ³	ü	ü			ü	
New Railcar TRU ⁴	ü	ü		ü		
In-Use TRU Generator Set ³	ü	ü		ü		
New TRU Generator Set ⁴	ü	ü			ü	

6. What are the requirements for TRUs I lease and operate in California?

Owners and operators are responsible for making sure that the TRUs they own or operate in California comply with the TRU ATCM. Lessors (owners) are typically responsible for ensuring the equipment they provide is compliant with regulatory requirements. If an operator is found to be operating in California with a non-compliant leased or rented TRU, the operator will be cited for the infraction and a penalty assessed. The lessor will also be cited, since lessors are prohibited from leasing or offering for lease any TRU for use in California that does not comply with the TRU ATCM. However, if the rental or lease agreement is for a period of one year or longer, the lessor may delegate compliance responsibility to the lessee provided a Third Party Agreement Confirmation Form has been submitted by the owner or lessor on behalf of a lessee and the lease contract shows clear

³ Model year 2022 and older.
⁴ Model year 2023 and newer.

delegation of the TRU regulatory requirements to the lessee. Third Party forms for the lessor/lessee (and alternatively for the contractor/consultant) are available on the [TRU Forms webpage](#).

Reporting TRUs to CARB

7. When do the TRU reporting requirements begin?

Reporting requirements for all California-based TRUs were included in the original regulation and went into effect July 31, 2009. The 2022 Amendments expand the TRU reporting requirements to all TRUs that operate in California, including out-of-state-based units. Reporting of out-of-state-based TRUs that operate in California begins December 31, 2023

8. How do I report a TRU to CARB?

Owners may report their TRU(s) to CARB by applying for a CARB identification number (IDN) through the [ARB Equipment Registration Program \(ARBER\)](#). Applications are also available on the [TRU Forms webpage](#) and may be submitted by email to arber@arb.ca.gov, or by mail to:

California Air Resources Board
Transportation and Toxics Division (TRU)
P.O. Box 2815
Sacramento, CA 95812

For step-by-step instructions, see the guidance document on [How to Report a TRU to CARB](#).

9. How do I register multiple TRU units at one time?

ARBER can process batch uploads for companies that register 100 or more TRUs. For more information, visit the [ARBER Batch Upload Help webpage](#).

10. Can operators report a TRU to CARB on behalf of an owner?

Yes, TRU operators (lessee) may report a TRU to CARB if a Third Party Agreement Confirmation Form has been submitted by the owner or lessor on behalf of a lessee, contractor, or consultant. Third Party forms for the lessor/lessee (and alternatively for the contractor/consultant) are available on the [TRU Forms webpage](#).

11. What if I no longer own a reported TRU or its information changes?

Updates are required within 30 days of when a TRU is purchased or sold, or when compliance information changes.

12. I have compliant units, but my company is not showing up on the 100% TRU ATCM Compliant Carrier List Search page when facilities search our company name.

Companies must only have compliant TRUs in their ARBER account to be on the 100% Compliant Carrier List. If there are any non-compliant units in an account, the company will not show up on the 100% Compliant Carrier List. Non-compliant units are not allowed to operate in California and should be removed from your active equipment list in ARBER. To remove a non-compliant unit, click on the IDN of the unit, and click on the edit button on the top of the confirmation page. Change the status of the unit to either "Removed from Service," if the unit has been scrapped, "Not in California," if the unit is no longer operating in California, or "Sold," if the unit is no longer under the company's ownership.

Information used to search the 100% Compliant Carrier List must match current information in the ARBER database. For example, if a company has not reported their Motor Carrier Number in ARBER, the company will not show up when using that search criteria. Similarly, if an incorrect spelling or variation of a company name is used as search criteria and does not match the company name registered in ARBER, the company will not show up.

TRU Operating Fees

Per the December 18, 2023, [TRU ATCM Implementation Update](#), TRU owners or owner/operators are not required to pay TRU operating fees at this time.

TRU Compliance Labels

13. When does the TRU compliance label requirement begin?

December 31, 2023.

14. When will I receive my TRU compliance labels?

CARB will issue two TRU compliance labels to each unit after the unit has been reported in ARBER and unit compliance has been verified.

Per the December 18, 2023, [TRU ATCM Implementation Update](#), CARB plans to begin issuance of TRU compliance labels in early 2024. TRU owners will not receive TRU compliance labels by December 31, 2023. In the meantime, owners may print a copy of their ARBER certificate to show proof of compliance.

15. How will I receive my TRU compliance labels?

CARB will mail TRU compliance labels to the company mailing address reported in ARBER.

16. Why did I get two TRU compliance labels for each of my units?

The regulation requires owners to affix two TRU compliance labels to their units, one on each side of the unit. Owners should verify that the set of labels have the same number and punched expiration month.

17. How long are the TRU compliance labels valid for?

TRU compliance labels are valid for 3 years, however, if the TRU has a compliance deadline within the 3-year period that the labels are valid, owners are responsible for maintaining TRU compliance. Failure to maintain TRU compliance may result in enforcement action. After the 3-year period, CARB will issue new TRU compliance labels once unit compliance has been verified. For more information, see the [TRU Compliance Label Requirements Frequently Asked Questions document](#).

Lower Global Warming Potential Refrigerant

18. When does the lower global warming potential refrigerant requirement begin?

December 31, 2022.

19. What TRU types does the lower global warming potential refrigerant requirement apply to?

Newly-manufactured (model year 2023 and newer) truck TRUs, trailer TRUs, and domestic shipping container TRUs.

20. Does the lower global warming potential refrigerant requirement apply to in-use TRUs?

No, the lower global warming potential refrigerant requirement applies to only newly-manufactured (model year 2023 and newer) truck TRUs, trailer TRUs, and domestic shipping container TRUs.

21. How do I know if my TRU uses refrigerant that complies with the TRU ATCM?

Beginning December 31, 2022, TRU OEMs are prohibited from manufacturing truck TRUs, zero-emission truck TRUs, trailer TRUs, or domestic shipping container TRUs for sale or use in California that do not use a refrigerant that complies with the TRU ATCM. TRU OEMs are required to label each TRU to indicate that the TRU uses a refrigerant with a global warming potential value less than or equal to 2,200 and is compliant for use in the State of California.

PM Emission Standard

22. When does the PM emission standard requirement begin?

December 31, 2022.

23. Does the PM emission standard apply to in-use TRUs?

No, the PM emission standard applies only to newly-manufactured non-truck TRUs. In-use non-truck TRUs are subject to the in-use performance standard. More information on the in-use performance standard is provided in questions 27-34.

24. Does the PM emission standard apply to truck TRUs?

No, the PM emission standard applies only to newly-manufactured non-truck TRUs. Truck TRUs are subject to the zero-emission fleet requirement. More information on the zero-emission truck TRU fleet requirement is provided in questions 35-41.

25. How can I comply with the PM emission standard?

The PM emission standard requirement can be met by using a TRU with an engine certified to the required emission standard. Note that engines <25 hp, are required to be certified to meet the PM emission standard, while engines ≥ 25 hp, are required to meet the applicable nonroad/off-road emissions standards for all regulated pollutants and the PM emission standard.

26. How do I know my TRU is equipped with an engine certified to meet the PM emission standard?

TRU OEMs are prohibited from producing units for sale or use in California that do not comply with the requirements of the TRU ATCM, including the PM emission standard. However, TRU owners may ensure that their TRU is equipped with an engine certified to meet the PM emission standard by looking up the engine certification levels on the executive order issued to the TRU engine on the [CARB New Vehicle and Engine and Certification Program webpage](#).

27. I plan to buy a hybrid-electric trailer TRU. Can I meet the PM emission standard using the Alternative Technology compliance option?

No, all newly-manufactured (model year 2023 and newer) non-truck TRUs are required to meet the PM emission standard. The use of an Alternative Technology may only be used to comply with the in-use performance standard that applies to in-use (model year 2022 and older) non-truck TRUs.

In-Use Performance Standard

28. Does the in-use performance standard apply to newly-manufactured non-truck TRUs?

No, the in-use performance standard applies only to in-use (model year 2022 and older) non-truck TRUs. Newly-manufactured (model year 2023 and newer) non-truck TRUs are

subject to the PM emission standard. More information on the PM emission standard is provided in questions 21-26.

29. I have a trailer TRU with a model year 2018 engine. When am I required to comply with the in-use performance standard?

The TRU ATCM requires compliance with the in-use performance standard on or before December 31st of the seventh year of the engine’s model year. A trailer TRU equipped with a model year 2018 engine is required to meet the in-use performance standard on or before December 31, 2025.

30. How do I comply with the in-use performance standard?

The in-use performance standard can be met by 1) Using an engine that meets the Ultra-Low Emission TRU (ULETRU) in-use PM performance standard of 0.02 grams per brake horsepower-hour or less,⁵ 2) Retrofitting the engine with a Level 3 verified diesel emission control strategy (VDECS), or 3) Using an Alternative Technology.

31. Where can I find a list of Level 3 TRU VDECS that can be used to meet the in-use performance standard?

A list of verified Level 3 TRU VDECS is available on the [TRU Compliance Information webpage](#).

32. Can particulate filters damage TRU engines?

Diesel particulate filters must be correctly matched to TRU engines. TRU engine operations must be conducted in a way that conforms to the diesel emissions control system manufacturer’s owner’s manual. Attention to proper use and maintenance details will help avoid the potential for engine damage. For example, ignoring a backpressure warning light may result in damage to the retrofit device and may stop the engine. Proper training for drivers and yard personnel should greatly reduce the chance of this happening. For more information on proper VDECS use and maintenance, visit the [CARB Heavy Duty Diesel Emission Control Strategy Installation and Maintenance webpage](#). To search for compatible VDECS available for a specific TRU engine, visit the [CARB Retrofit Verification Database](#).

33. Do VDECS come with a warranty?

Yes, CARB's verification procedures for TRU VDECS hardware requires a warranty, as follows:

Engine Size	Minimum Warranty Period
Under 25 hp	3 years or 1,600 hours (whichever occurs first)

⁵ The engine shall meet the applicable nonroad/off-road emissions standards for all regulated pollutants and the in-use PM performance standard.

Engine Size	Minimum Warranty Period
At or above 25 hp and under 50 hp	4 years or 2,600 hours (whichever occurs first)
At or above 50 hp	5 years or 4,200 hours (whichever occurs first)

34. What do I do if my TRU VDECS has a failed trap?

A failed device that is still under warranty must be replaced with the same device. Once the warranty has expired, the owner must use the highest level of VDECS available for the TRU engine as a replacement.

35. What Alternative Technologies can be used to meet the in-use performance standard?

Alternative Technologies can be used to meet ULETRU in-use performance standard if diesel PM emissions are eliminated while at a facility, with limited exceptions (e.g., during an emergency or normal yard maneuvering). They include use of: 1) Electric standby-equipped or hybrid electric (may be driven by integral diesel engine or electric motor, or an integral diesel engine-driven generator set that provides electric power to the electric motor-driven refrigeration system), 2) Hybrid cryogenic temperature control systems (cryogenic temperature control system used in conjunction with a conventional TRU), 3) Alternative diesel-fueled engines, if the fuel has been verified as a diesel emissions control strategy, 4) Fuel cell-powered temperature control systems, and 5) Other systems approved by CARB to not emit diesel PM or increase public health risk near a facility.

Zero-Emission Truck TRU Fleet Requirement

36. When does the zero-emission truck TRU fleet requirement begin?

December 31, 2023. The first compliance date for a given fleet is dependent on the number of truck TRUs in the fleet. For example, a fleet consisting of one diesel-powered truck TRU will be required to replace it with a zero-emission unit by December 31, 2026. See the compliance schedule for the zero-emission truck TRU requirement in question 36.

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

Table 3 shows the phase-in compliance schedule for different size truck TRU fleets. Owners should use basic rounding methodology when calculating the required number of zero-emission truck TRUs. If the calculated number of required zero-emission truck TRUs is not equal to a whole number, round up to a whole number when the fractional part is equal to or greater than 0.5, and round down if less than 0.5.

Table 3: Phase-in Compliance Schedule for Zero-Emission Truck TRU Fleet Requirement

Compliance Deadline as of December 31	2023	2024	2025	2026	2027	2028	2029
Fleet with 1 Truck TRU				1	1	1	1
Fleet with 2 Truck TRUs		1	1	1	2	2	2
Fleet with 3 Truck TRUs		1	1	2	2	3	3
Fleet with 4 Truck TRUs	1	1	2	2	3	4	4
Fleet with 5 Truck TRUs	1	2	2	3	4	5	5
Fleet with 6 Truck TRUs	1	2	3	4	5	5	6
Fleet with 7+ Truck TRUs	15%	30%	45%	60%	75%	90%	100%

38. Does the zero-emission truck TRU requirement apply to trailer TRUs?

No, the zero-emission fleet requirement applies only to truck TRUs. Staff are assessing zero-emission options for non-truck TRUs and plan to take a second rulemaking (TRU Part 2) to the Board for consideration.

39. Does the zero-emission truck TRU requirement apply to the truck to which the refrigeration unit is mounted on?

No, the zero-emission truck TRU fleet requirement applies only to the truck TRU, not the truck itself. However, the truck may be subject to other CARB regulations.

40. 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 the [On-Road Heavy-Duty Funding Opportunities webpage](#).

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 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). More information on compliance extensions and exemptions can be found in questions 67-70. For more information on available zero-emission truck TRUs, visit the [Zero-Emission Truck TRU Technologies webpage](#).

41. What if I am unable to install infrastructure needed to support the use of zero-emission truck TRUs in time to meet the zero-emission truck TRU fleet requirement?

The TRU ATCM provides an extension to the zero-emission truck TRU fleet requirement based on delays due to the installation of zero-emission infrastructure. More information on compliance extensions and exemptions can be found in questions 67-70.

42. Can I downsize my truck TRU fleet instead of meeting the zero-emission truck TRU fleet percentage?

TRU owners may downsize their truck TRU fleet size only if the TRU owner has not purchased additional direct-drive refrigeration units, in which the compressor is powered from the truck's diesel engine, to replace the original diesel-powered units being sold or retired. The owner must report their intent to downsize their fleet, the proposed number of truck TRUs in the fleet, and any TRUs acquired or sold in the prior compliance year to CARB. However, they will still be subject to the required zero-emission truck TRU fleet percentage requirement, using the downsized number of truck TRUs as the total truck TRU fleet going forward.

For more information on the zero-emission truck TRU fleet requirement, see the [Zero-Emission Truck TRU Requirement Frequently Asked Questions document](#).

Applicable Facility Owner/Operator Requirements

43. What is an applicable facility?

An applicable facility is defined as a refrigerated warehouse or distribution center with a building size greater than or equal to 20,000 square feet, a grocery store with a building size greater than or equal to 15,000 square feet, a seaport facility, or an intermodal railyard if one or more TRUs operate within the legal property boundary of the facility. Office spaces and other non-refrigerated areas are included in the building size.

44. When do the applicable facility owner/operator requirements begin?

December 31, 2023.

45. What requirements apply to applicable facility owners/operators?

Applicable facility owners/operators are required to register their facility with CARB and ensure compliance of TRUs operating onsite. For more information on applicable facility owner/operator requirements, visit the [Applicable Facility Requirements webpage](#).

46. How do I register my applicable facility with CARB?

Fill out one applicable facility registration form (*Form TTD/FTB-099*) per applicable facility. Submit completed form(s) by email to arber@arb.ca.gov (preferred) or mail to the following address:

California Air Resources Board
Transportation and Toxics Division (TRU)
PO Box 2815
Sacramento, CA 95812

47. How do I pay applicable facility registration fees?

Per the December 18, 2023, *TRU ATCM Implementation Update*, applicable facility owners are not required to pay applicable facility registration fees at this time.

48. I own an applicable facility. How do I comply with the requirement to ensure TRU compliance?

Applicable facility owners/operators may comply with the requirement to ensure TRU compliance by one of two options: 1) Report all TRUs that operate within the applicable facility property boundary to CARB, quarterly, or 2) Provide a declaration to CARB, under penalty of perjury, that non-compliant TRUs subject to the TRU ATCM will not be permitted to operate within the property boundary.

49. How do I notify CARB of which compliance option I will be using?

Applicable facility owners/operators will be asked to indicate their chosen compliance option upon initial registration of their facility.

50. If I choose option 1 to report all TRU activity to CARB, what information am I required to submit?

Applicable facility owners are required to submit the information specified in section 2477.20(m) of the TRU ATCM for each TRU that operates inside the facility fence line or property boundary. Owners may submit the required information using the [Applicable Facility Quarterly Reporting Template](#).

51. If I choose option 1 to report all TRU activity to CARB, when are reports due?

TRU activity reports are due to CARB beginning April 15, 2024, and quarterly thereafter in accordance with the schedule in Table 4.

Table 4: Applicable Facility TRU Reporting Schedule

TRU Entry Date	Date by which information is to be reported to CARB
January 1 - March 31	April 15
April 1 - June 30	July 15
July 1 - September 30	October 15
October 1 - December 31	January 15

52. If I choose option 2 to only allow compliant TRUs to operate at my facility, how can I ensure a TRU is compliant with the TRU ATCM?

For applicable facilities that choose option 2, there are four ways a facility may verify a TRU is compliant with the TRU ATCM: 1) Unit has a valid TRU compliance label, 2) Unit shows as compliant on the [ARB ER TRU Compliance Search page](#), 3) Unit is owned by a company on the [100 Percent TRU ATCM Compliant Carrier List page](#), or 4) Unit is listed in the Kiteworks Compliant TRU file. For more information, see the guidance document on [How to Check TRU Compliance](#).

53. Can applicable facility owners/operators change which compliance option they will be using?

Yes, an applicable facility owner/operator may change their selected compliance option by notifying CARB by September 30 of the preceding calendar year.

54. I do not own or control the TRUs that operate at my facility. Will I be cited if I allow non-compliant TRUs onto my property?

Depending on the compliance option chosen, an applicable facility may be cited for non-compliant TRUs operating onsite. If an applicable facility owner/operator chooses reporting option 1, they are required to report all TRU activity to CARB (compliant and non-compliant TRUs). If this option is chosen, the applicable facility owner/operator will not be cited for the use of non-compliant TRUs onsite so long as they meet the reporting requirements outlined in section 2477.17(e)(1). If an applicable facility owner/operator chooses reporting option 2, they are required to ensure TRU compliance and will be cited for the use of non-compliant TRUs onsite.

55. Why are applicable facility owners/operators subject to the TRU ATCM if TRUs are the source of the emissions?

TRU emissions are generated at applicable facilities and impact communities surrounding them. Therefore, applicable facility owners/operators should bear some responsibility for ensuring TRUs operating on their properties are compliant with emissions requirements.

56. If a facility's entry gate is not at the property line, trucks, similar with locomotives, must enter the facility prior to the first opportunity for a compliance inspection. A noncompliant unit being rejected would then be turned around and must travel within the facility again, to the exit gate. Is the facility liable for this travel?

For facilities where the compliance checkpoint is inside the property line (versus at the property line), the facility would not be liable for travel by a noncompliant unit from the compliance checkpoint to the entry/exit gate after being turned away for noncompliance.

TRU OEM Requirements

57. What requirements apply to TRU OEMs?

Beginning December 31, 2022, TRU OEMs are prohibited from manufacturing for sale or use in California, a truck TRU, trailer TRU, or domestic shipping container TRU, unless the TRU uses refrigerant with a global warming potential less than or equal to 2,200, or no refrigerant at all and has a proper refrigerant label.

Beginning May 31, 2023, TRU OEMs are prohibited from manufacturing for sale or use in California, a trailer TRU, domestic shipping container TRU, railcar TRU, or TRU generator set, unless it is equipped with an engine that meets or outperforms the PM emission standard.

Beginning December 31, 2023, TRU OEMs are prohibited from manufacturing for sale or use in California, a truck TRU, unless it is zero-emission. TRU OEMs are required to provide a warranty for each zero-emission truck TRU for a period of three years from the date of purchase or 5,000 hours of compressor run time, whichever occurs first; and have an authorized service-and-repair facility located in California to perform warranty repairs. TRU OEMs are also required to submit monthly production reports.

58. What information must be included in the TRU OEM monthly production reports?

TRU OEM monthly production reports must include the information set forth in section 2477.20(I) for each TRU, TRU generator set, and zero-emission truck TRU produced for sale in California, North America, Canada, and Mexico during the previous calendar month.

59. When are TRU OEM monthly production reports due?

Monthly production reports are due to CARB by the end of the second business day of each calendar month.

60. Is there a TRU OEM monthly production report template?

Yes, the TRU OEM monthly production report template is available on the [TRU Forms webpage](#).

61. How do I submit TRU OEM monthly production reports?

Monthly production reports should be submitted by email to arberdata@arb.ca.gov.

Vehicle Owner Requirements

62. When do vehicle owner requirements begin?

December 31, 2022.

63. What requirements apply to vehicle owners?

Vehicle owners are prohibited from operating or causing to be operated, TRU-equipped trucks or tractor-trailers equipped with a TRU, unless the TRU complies with the TRU ATCM. Upon request by CARB enforcement personnel, vehicle owners are also required to provide the information set forth in section 2477.6 of the TRU ATCM.

Driver Requirements

64. When do driver requirements begin?

Requirements for drivers were included in the 2011 amendments to the TRU ATCM and went into effect January 1, 2013. The 2022 Amendments include a new driver requirement to allow CARB personnel to conduct a visual inspection of a TRU upon request, which begins October 1, 2022.

65. What requirements apply to drivers?

Drivers are prohibited from operating a TRU-equipped truck or tractor-trailer equipped with a TRU on a California highway, unless the TRU complies with the TRU ATCM. Upon request by CARB enforcement personnel, drivers are also required to provide the information set forth in section 2477.7 and allow CARB enforcement personnel to conduct a visual inspection of a TRU to determine whether emission control components have been tampered with, inadequately maintained, or are defective.

Freight Broker, Freight Forwarder, Motor Carrier, Shipper, and Receiver Requirements

66. When do the freight broker, freight forwarder, motor carrier, shipper, and receiver requirements begin?

Requirements for freight brokers, freight forwarders, California-based shippers, and California-based receivers were included in the 2011 amendments to the TRU ATCM and went into effect January 1, 2013. The 2022 Amendments expand the requirements to apply to any shipper or receiver that arranges, tenders contracts for, or dispatches the transport of perishable goods that requires the operation of TRU-equipped or TRU generator set-equipped trucks, trailers, shipping containers, or railcars in the State of California, regardless of whether the shipper or receiver is based in California, beginning October 1, 2022.

67. What requirements apply to freight brokers, freight forwarders, motor carriers, shippers, and receivers?

Any business entity that hires motor carriers to transport perishable goods on California highways and railways must require the motor carriers they hire or contract with for transport of perishable goods, to only dispatch TRUs that comply with the TRU ATCM. The hiring business entity must also provide their contact information to the motor carrier, which must then be carried with the driver. Shippers and receivers are required to provide information to the motor carrier about the shipper and receiver names and addresses. Motor carriers are required to provide the driver with contact information for the shipper, receiver, and business entity that hired the motor carrier.

Extensions and Exemptions

68. I ordered a new TRU to comply with the TRU ATCM, but there is a bottleneck in the supply chain. Is there a compliance extension available for delays due to private financing, equipment manufacture delays, or installer delays?

Yes, TRU owners may apply for a one-time compliance extension of up to six months for the refrigerant, PM emission standard, in-use performance standard, and zero-emission truck TRU fleet requirements based on delays due to private financing, equipment manufacture delays, or installer delays. The owner must have ordered the compliance technology from the manufacturer no later than two months before the compliance date for VDECS retrofit compliance technologies and no later than four months before the compliance date for engine replacements, unit replacements, and trailer replacements. The application for a compliance extension based on delays due to private financing, equipment manufacture delays, or installer delays is available on the [TRU Forms webpage](#) and may be submitted by email to arber@arb.ca.gov, or by mail to:

California Air Resources Board
Transportation and Toxics Division (TRU)
P.O. Box 2815
Sacramento, CA 95812

69. My local utility said it will take 6 months to complete my request for an electrical service upgrade. Is there a compliance extension available for delays due to zero-emission fueling infrastructure?

Yes, TRU owners/operators may apply for an annual extension in compliance, up to a maximum of two years, for the zero-emission truck TRU fleet requirement due to unforeseen, temporary, or extenuating circumstances outside of the owner/operator's control that prevents the installation of zero emission fueling Infrastructure at the facility at which the truck TRU fleet is domiciled. Circumstances beyond the truck TRU owner's control may include a delay in the manufacture and shipment of zero-emission fueling infrastructure equipment, a delay in obtaining construction permit(s), a delay in obtaining power from a utility, a delay due to private financing, a delay in the installation of zero-emission fueling infrastructure, a natural disaster, or the discovery of archeological, historical, or tribal cultural resources under the California Environmental Quality Act. The owner/operator 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. The owner/operator may, 60 days prior to the expiration of the extension, apply for an additional one-year extension. The owner/operator may, 60 days prior to the expiration of the second extension, apply for an additional compliance extension beyond the first two annual extensions due to a delay in obtaining power from a utility.

CARB will approve, modify, or disapprove the application and notify the applicant accordingly within 45 days of submission of a complete application. If the application is incomplete or cannot be approved, CARB will notify the applicant about what information is required or provide reasons why the extension cannot be approved. The application for a compliance extension based on delays due to zero-emission fueling infrastructure is available on the [TRU Forms webpage](#) and may be submitted by email to arber@arb.ca.gov, or by mail to:

California Air Resources Board
Transportation and Toxics Division (TRU)
P.O. Box 2815
Sacramento, CA 95812

70. Are TRUs used during emergency events exempt from the TRU ATCM?

A mobile catering company can obtain an exemption from the refrigerant, PM emission standard, in-use performance standard, and zero-emission truck TRU fleet requirements if operating under a contract with the National Interagency Fire Center (NIFC) to provide

mobile catering service during an emergency, such as wildfire response. Exempt companies must still comply with the TRU reporting requirements in section 2477.5(g) and CARB IDN labeling requirements. Mobile catering company exemptions are good for one year and can be renewed annually. Exemptions expire on December 31st of each year. The application for a mobile catering exemption is available on the [TRU Forms webpage](#) and may be submitted by email to arber@arb.ca.gov, or by mail to:

California Air Resources Board
Transportation and Toxics Division (TRU)
P.O. Box 2815
Sacramento, CA 95812

If the application is complete and approved, CARB will issue a Mobile Catering Service Exemption to the mobile catering company within 30 days. If the application is incomplete or cannot be approved, CARB will notify the applicant about what information is required or provide reasons why the exemption cannot be approved. Applicants may then re-apply to re-start the application process.

71. I purchased a non-compliant TRU from out-of-state. Can I bring it to a repair shop in California to install a VDECS to comply with the TRU ATCM?

Yes, TRU owners may apply for a safe passage permit to travel on California highways with a specific noncompliant TRU. The purpose of traveling in California must be to take the noncompliant equipment to a dealer or installer to bring the equipment into compliance. The permit is a one-time permit for the sole purpose of bringing the TRU into compliance with the TRU ATCM. The TRU cannot operate (with the engine running) in California and no temperature sensitive products can be transported in a vehicle with a noncompliant TRU. The application for a safe passage permit is available on the [TRU Forms webpage](#) and may be submitted by email to arber@arb.ca.gov, or by mail to:

California Air Resources Board
Transportation and Toxics Division (TRU)
P.O. Box 2815
Sacramento, CA 95812

CARB will provide a decision within 15 days of receiving the application. If the application is approved, CARB will provide a safe passage permit specific to the one-time travel in California with the noncompliant equipment. If the application is not approved, CARB will notify the applicant of the decision and the noncompliant equipment cannot be brought into California.

Enforcement

72. What is the policy or process for violations of the TRU ATCM?

CARB follows its *Enforcement Policy* to resolve violations of any CARB regulation.

73. What kind of penalties could result from violations of the TRU ATCM?

Penalties will depend on the specific violation and will be assessed for failure to meet the refrigerant, PM emission standard, in-use emission standard, or zero-emission truck TRU requirement; failure to report TRUs to CARB or registering an applicable facility with CARB; failure to affix compliance labels or the IDN to both sides of the TRU housing in accordance with the requirements; or submitting incorrect information. Penalties are additive. Failure to correct a noncompliance within 30 days is cause for a greater penalty amount. Penalty provisions are set forth in California Health and Safety Code sections 39674, 39675, 42400 et seq., 42402 et seq., and 42410. In addition, CARB will not issue TRU compliance labels to units if the owner has outstanding enforcement actions (i.e., uncorrected citations, unpaid penalties or settlement payments, violations of settlement terms, failure to submit to inspections, etc.).