

TRU ATCM

TRU Compliance Label Requirements Frequently Asked Questions

Last Updated March 2024

This document contains frequently asked questions and answers on the transport refrigeration unit (TRU) compliance label requirements 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, TRU owners are required to affix CARB-issued TRU compliance labels to all TRUs operating in California.

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.

When does the TRU compliance label requirement begin?

December 31, 2023.

When will I receive my TRU compliance labels?

CARB will issue two TRU compliance labels to each compliant unit after the unit has been reported to CARB, invoiced, and fees have been paid and processed.

How will I receive my TRU compliance labels?

CARB will mail TRU compliance labels to the company mailing address reported in the ARB Equipment Registration (ARBER) program.

How big are the TRU compliance labels?

The TRU compliance labels measure 4.5" X 4.5".

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.

Why are the months of the year printed on the bottom of the TRU compliance labels?

Owners are responsible for punching the expiration month on the TRU compliance labels. CARB will provide a company equipment list with all issued labels indicating the month the compliance labels expire.



Where should I place the labels on my unit(s)?

The regulation requires that TRU compliance labels be permanently affixed to both sides of the TRU in the designated areas below.

- Trailer and Truck TRUs- both sides of TRU chassis housing.
- Rail car and shipping container TRUs- both sides of TRU.
- TRU generator sets- both sides of generator set housing.

How long do I have to place the labels on my unit(s)?

The regulation requires that owners place the TRU compliance labels on their unit(s) within 30 days of receipt.

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 is verified, the owner is invoiced, and fees have been paid and processed.

How do I get replacement TRU compliance labels?

Labels that are damaged, unreadable, or affixed to the incorrect TRU must be replaced. To get replacement labels, email arber@arb.ca.gov or call the TRU Help Line at 1-888-878-2826.

Am I still required to affix the ARB IDN on both sides of my unit?

No, as of December 31, 2023, the TRU compliance label requirements in section 2477.5(i) superseded the IDN labeling requirements in section 2477.5(g)(6). CARB-issued TRU compliance labels are being mailed to companies with compliant TRUs reported in ARBER. ARB IDNs are no longer required to be affixed on the TRUs, however, ARBER will still assign an ARB IDN for each TRU upon completion of registration. Owners may remove previously affixed ARB IDN decals from their TRUs at their discretion, however, applicable facilities may use ARB IDNs to determine TRU compliance and may be required to report the ARB IDN to CARB dependent on the reporting option chosen by the applicable facility.