

TRU ATCM

U.S. EPA Action on Authorization Request for the 2022 Amendments Frequently Asked Questions

Published June 11, 2025

On February 24, 2022, CARB approved amendments (2022 Amendments¹) to the Transport Refrigeration Unit Air Toxic Control Measure (TRU ATCM) for In-Use Diesel-Fueled TRUs (Title 13 CCR §§ 2477-2477.24), effective October 1, 2022. The amendments aim to further reduce emissions and health risks from diesel-powered TRUs, promote the use of zero-emission technology in the off-road sector, and help meet the state's multiple risk reduction, air quality, and climate goals. On January 3, 2025, U.S. EPA waived federal preemption for all but the zero-emission TRU requirements.²

This document contains questions and answers on the *U.S. EPA Action* on the TRU Regulation authorization request under Clean Air Act Section 209(e).

While this document is intended to assist with compliance efforts, it is the sole responsibility of each regulated entity to ensure compliance with the 2022 Amendments to the TRU ATCM. For the latest information on the 2022 Amendments to the TRU ATCM, visit *TRU program page*. If you have questions, email *arber@arb.ca.gov* or call the TRU Help Line at 1888-878-2826.

Are truck TRU owners and owner/operators required to purchase zero-emission truck TRUs?

No. TRU owners and owner/operators are not required to turnover their diesel-fueled truck TRU fleet to zero-emission. However, truck TRUs must use a refrigerant with global warming potential less than or equal to 2,200 or no refrigerant at all, meet reporting and labeling requirements, and be otherwise compliant with the TRU ATCM.

TRU owners and owner/operators are highly encouraged to purchase the cleanest technology available when turning over their TRU fleet.

¹ The 2022 Amendments to the TRU ATCM are available at: https://ww2.arb.ca.gov/rulemaking/2021/tru2021.

² U.S. EPA, California State Nonroad Engine Pollution Control Standards; In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets; Decision Document (EPA-420-R-25-003; January 2025).

Am I still able to use my diesel-fueled truck TRUs?

Yes. Model year 2014 and older truck TRU engines were required to comply with the ultralow-emission in-use performance standard seven years after the engine model year. Model year 2015 and newer TRUs are not currently subject to an in-use standard. Truck TRUs manufactured December 31, 2022 or after must use a refrigerant with global warming potential less than or equal to 2,200 or no refrigerant at all, meet reporting and labeling requirements, and be otherwise compliant with the TRU ATCM.

Can I purchase a newly-manufactured diesel-fueled truck TRU?

Yes. TRU owners and owner/operators may purchase newly-manufactured diesel-fueled truck TRUs from California dealers that use a refrigerant with a global warming potential value less than or equal to 2,200 or uses no refrigerant at all, meet reporting and labeling requirements, and are otherwise compliant with the TRU ATCM.

How long will I be able to use a diesel-fueled truck TRU?

Truck TRUs are not currently subject to an in-use standard and do not have a compliance deadline. CARB is currently working on the next TRU rulemaking aimed at increasing the use of zero-emission technology across all TRU categories (including truck TRUs). The specifics and timing of this regulation have not been determined at this time.

Do I still need to register my truck TRU?

Yes, all TRUs operating in California must be reported to CARB in the *ARBER System* regardless of whether they are California-based or non-California-based.

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

Yes. For more information on TRU incentive funding, visit the *TRU Funding Assistance* website. TRU owners and owner/operators should act early to take advantage of incentive funding, as most programs prohibit the use of funds to pay for regulatory compliance.

I want to install a zero-emission TRU on a zero-emission truck, but there are no zero-emission trucks available for purchase.

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. For more information on CARB's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project and other funding programs, visit the *On-Road Heavy-Duty Funding Opportunities* website. TRU manufacturers are also developing zero-emission truck TRUs for use on diesel-fueled trucks and there are commercially-available cold plate and cryogenic technologies.

Are TRU original equipment manufacturers required to only manufacture zero-emission truck TRUs?

No. TRU original equipment manufacturers may manufacture new diesel-fueled truck TRUs for sale or use in California, that are otherwise compliant with the TRU ATCM.

Can California dealers sell newly-manufactured diesel--fueled truck TRUs?

Yes, California dealers may sell newly-manufactured diesel-fueled truck TRUs, that are otherwise compliant with the TRU ATCM.

How can I stay up to date as more information becomes available?

For more information regarding the authorization for the 2022 Amendments visit *U.S. EPA's Vehicle Emissions California Waivers and Authorizations* website. For comprehensive details, including a copy of the 2022 Amendment, rulemaking documents, fact sheets, and frequently asked questions please visit CARB's *TRU Program website*. If you need this document in an alternative format or another language, please contact the CARB TRU team via email at *arber@arb.ca.gov* or via phone at the TRU Help Line, 1-888-878-2826 (1-888-TRU-ATCM).