

TRU ATCM (with the 2022 Amendments) Frequently Asked Questions (FAQ)

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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](#).

On January 3, 2025, U.S. EPA waived federal preemption for all but the zero-emission TRU requirements. This document reflects questions and answers on the [U.S. EPA Action](#) on the 2022 Amendments authorization request under Clean Air Act Section 209(e). More information on the zero-emission truck TRU requirements is available on the [TRU ATCM Zero-Emission Requirement Implementation Update 2025](#). TRU owners or owner/operators are highly encouraged to purchase the cleanest technology available when turning over or adding to a TRU fleet.

On September 17, 2025 Governor Newsom signed [Senate Bill \(SB\) 153](#), granting CARB authority to impose fees on entities regulated under the 2022 Amendments to the TRU ATCM. This FAQ reflects questions and answers regarding CARB's fee authority. For more information, see the [TRU ATCM Fee Authority Implementation Update 2025](#).

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 (DSC) TRUs, railcar TRUs, and TRU generator sets.

1. Who must comply with the TRU ATCM?

The TRU ATCM applies to owners or owner/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-fueled 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	Particulate matter (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 ¹

5. Does the TRU ATCM apply to diesel trucks and tractor-trailers?

No, the TRU ATCM only applies to TRUs, not diesel-fueled trucks or tractor-trailers. Diesel trucks may be subject to the Truck and Bus Regulation, Advanced Clean Trucks Regulation, Advanced Clean Fleets Regulation, and/or the Clean Truck Check Program. The tractor-trailers may be subject to the SmartWay Program, under the Tractor-Trailer Greenhouse Gas Regulation. For more information on diesel truck and tractor-trailer requirements, please call 1-866-6DIESEL (866-634-3735) or visit CARB's [TruckStop website](#).

Note, beginning December 31, 2022, vehicle owners and/or drivers shall not operate a TRU-equipped truck or tractor-trailer equipped with a TRU or TRU gen set in California unless the TRU or TRU gen set meets the following requirements:

- Lower global warming potential (GWP) refrigerant value of less than or equal to 2,200 or uses no refrigerant at all for newly manufactured truck TRUs, trailer TRUs, and DSC TRUs.

- Readable TRU OEM supplied refrigerant label.

- PM standard of 0.02 g/hp-hr or lower for newly manufactured non-truck TRU engines (model year (MY) 2023 and newer).

TRU Owners or Owner/Operator Requirements

6. What requirements apply to owners or owner/operators of TRUs?

The regulatory requirements that apply to the owners or owner/operators of a TRU are dependent on the type of TRU and whether it is in-use (model year 2022 and older) or

¹ U.S. EPA did not act on the zero-emission truck TRU requirements. TRU owner/operators are highly encouraged to purchase the cleanest technology available when turning over or adding to a TRU fleet. More information on the zero-emission truck TRU requirements is available on the [TRU ATCM Zero-Emission Requirement Implementation Update 2025](#).

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 or 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)
In-Use Truck TRU ²	√	√			√(model year 2014 and older)
New Truck TRU ³	√	√	√		
In-Use Trailer TRU ²	√	√			√
New Trailer TRU ³	√	√	√	√	
In-Use Domestic Shipping Container TRU ⁴	√	√			√
New Domestic Shipping Container TRU ⁵	√	√	√	√	
In-Use Railcar TRU ⁴	√	√			√
New Railcar TRU ⁵	√	√		√	

² Model year 2022 and older.

³ Model year 2023 and newer.

⁴ Model year 2022 and older.

⁵ 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)
In-Use TRU Generator Set ⁴	√	√			√
New TRU Generator Set ⁵	√	√		√	

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

Owners or owner/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 a lessee (operator) is found to be operating in California with a non-compliant leased or rented TRU, the lessee 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 lessor on behalf of a lessee and the lease contract shows clear 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

8. 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 TRUs. Reporting of out-of-state-based TRUs that operate in California begins December 31, 2023.

9. How do I report a TRU to CARB?

Owners or owner/operators 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](#).

10. How do I register multiple TRUs 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](#).

11. 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 (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](#).

12. 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.

13. What is the 100% TRU ATCM Compliant Carrier List Search Page?

The [100% Compliant Carrier List Search Page](#) allows users to retrieve a report listing companies that are 100 percent compliant with the TRU ATCM based on current information reported in the [ARBER](#) System.

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

Information used to search the 100% Compliant Carrier List must match current information in the ARBER System. 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 and Applicable Facility Registration Fees

15. Are TRU and applicable facility owners or owner/operators required to pay a fee?

Yes. The 2022 Amendments to the TRU ATCM, effective October 1, 2022, require TRU and applicable facility owners or owner/operators to pay TRU operating and applicable facility registration fees, respectively.

For more information on TRU operating and applicable facilities registration fees, see the [Fee Authority Implementation Update](#), [TRU and Applicable Facility Fee Requirements FAQ](#), and [TRU Fee Payment Instructions](#).

TRU Compliance Labels

16. When does the TRU compliance label requirement begin?

The TRU compliance label requirement begins December 31, 2023.

17. When will I receive my TRU compliance labels?

CARB will issue two TRU compliance labels to each compliant TRU after the TRU has been reported in the [ARBER](#) System, invoiced, and TRU operating fees have been paid and processed.

18. How will I receive my TRU compliance labels?

CARB will mail TRU compliance labels to the company mailing address reported in [ARBER](#).

19. Why did I get two TRU compliance labels for each of my TRUs?

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

20. 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 or owner/operators 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 TRU compliance has been verified.

For more information, see the [TRU Compliance Label Requirements FAQs document](#).

21. How do I know if my TRU goes out of compliance before the month and year on the compliance label?

The compliance through date in ARBER reflects the actual date through which the TRU is compliant with the TRU ATCM. The month and year on the compliance label, however, corresponds to the date the label itself was issued and does not guarantee that the TRU will remain compliant until that date. For this reason, owners or owner/operators should verify their TRU's compliance through date in their [ARBER](#) account to ensure the TRU remains compliant.

Lower Global Warming Potential Refrigerant

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

The TRU lower global warming potential begins December 31, 2022.

23. 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.

24. 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.

25. 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

26. When does the PM emission standard requirement begin?

The TRU PM emission standard requirement begins December 31, 2022.

27. 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 32-40.

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

No, the PM emission standard applies only to newly-manufactured non-truck TRUs.

29. 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.

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

TRU OEMs are prohibited from producing TRUs 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 or owner/operators 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](#).

31. 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

32. 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 26-31.

33. 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.

34. 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,⁶ 2) Retrofitting the engine with a Level 3 verified diesel emission control strategy (VDECS), or 3) Using an Alternative Technology.

35. 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](#).

36. 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](#).

37. 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)
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)

⁶ The engine shall meet the applicable non-road/off-road emissions standards for all regulated pollutants and the in-use PM performance standard.

38. 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.

39. 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.

40. Why did my TRU compliance status in ARBER change from compliant through "Always" to a blank field?

CARB updated the ULETRU status display in *ARBER* to show a blank field instead of "Always" to better reflect current regulatory requirements. Previously, an "Always" through date indicated that a TRU met the most stringent emission standard required, but future regulations may require further emission reductions. For more information on TRU types and their compliance schedules, please visit CARB's *TRU Compliance website*.

Zero-Emission Truck TRU Fleet Requirement

41. Did CARB receive an authorization for all the requirements in the 2022 Amendments?

On January 3, 2025, U.S. EPA waived federal preemption for all but the zero-emission TRU requirements.⁷ TRU owners and owner/operators are highly encouraged to purchase the cleanest technology available when turning over their TRU fleet. For more information regarding the authorization for the 2022 Amendments visit *U.S. EPA's Vehicle Emissions California Waivers and Authorizations* website, the *TRU ATCM Zero-Emission Requirement Implementation Update 2025* and corresponding *FAQ*.

⁷ 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).

Applicable Facility Owner or Owner/Operator Requirements

42. 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.

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

The applicable facility requirements begin December 31, 2023.

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

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

45. How much is the applicable facility registration fee?

The applicable facility registration fee is \$45, to be paid once every three years. Once CARB receives and processes the [Applicable Facility Registration Form](#), CARB will email an invoice to the email address provided on the registration form. Applicable facility owners or owner/operators should not submit payment with their registration form.

46. If I choose Option 2, to provide a declaration to CARB and only allow compliant TRUs to operate at my facility, am I required to display signage that says only compliant TRUs may enter my facility?

No, applicable facilities are not required to display any signage that only compliant TRUs may enter their facility, however, applicable facilities may do so at their discretion.

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

Yes, an applicable facility owners or owner/operators may change their selected compliance option by updating their [Applicable Facility Registration Form](#) by September 30 of the preceding calendar year. When selecting the Application Type, select "I need to update a facility that is already registered". You will then be prompted to enter your existing Facility ID number. After entering the Facility ID number, you will be given the option to update facility information.

48. 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 or 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 or 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 or 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.

49. Why are applicable facility owners or owner/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 or owner/operators should bear some responsibility for ensuring TRUs operating on their properties are compliant with emissions requirements.

50. 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 non-compliant TRU 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 non-compliant TRU from the compliance checkpoint to the entry/exit gate after being turned away for noncompliance.

51. My facility has closed but I am still receiving correspondence regarding this location. What do I need to do?

To notify CARB of a closed facility, an updated *Applicable Facility Registration Form* must be submitted. When filling out the Application Type, select "I need to update a facility that is already registered". You will then be prompted to enter your existing Facility ID number. After entering the Facility ID number, you will be given the option to indicate "I am no longer at this facility."

TRU OEM Requirements

52. 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.

TRU OEMs are also required to submit monthly production reports.

53. 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(l) for each TRU and TRU generator set produced for sale in California, North America, Canada, and Mexico during the previous calendar month.

54. 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.

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

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

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

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

57. How does the U.S. EPA Action impact OEMs and California dealers?

TRU OEMs may manufacture for sale or use in California, new diesel-fueled truck TRUs that are otherwise compliant with the TRU ATCM.

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

Vehicle Owner Requirements

58. When do vehicle owner requirements begin?

The vehicle owner requirements begin December 31, 2022.

59. 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

60. 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.

61. 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

62. 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.

63. 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

64. 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, and in-use performance standard 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

65. 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.

66. 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 non-compliant TRU. The purpose of traveling in California must be to take the non-compliant 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 non-compliant 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 non-compliant equipment. If the application is not approved, CARB will notify the applicant of the decision and the non-compliant equipment cannot be brought into California.

Enforcement

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

CARB follows its [Enforcement Policy](#) to resolve violations of any CARB regulation.

68. 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; 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 TRUs 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.).