

# Draft 2019 Update to Emissions Inventory for Transport Refrigeration Units



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**CALIFORNIA**  
AIR RESOURCES BOARD



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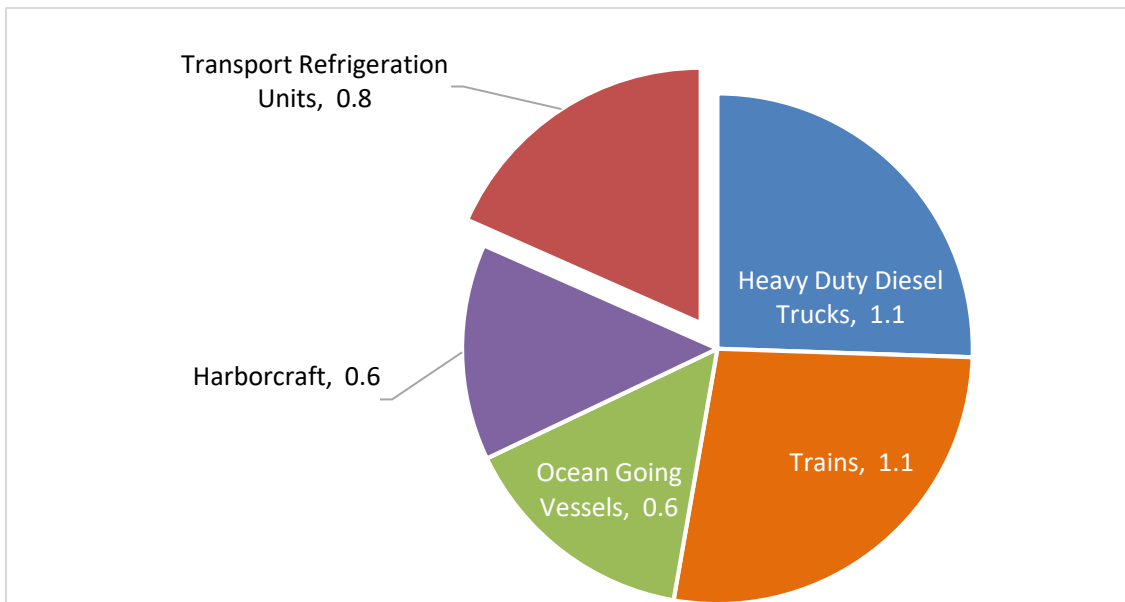
**1. Executive Summary**

Transport refrigeration units (TRU) are diesel-powered refrigeration units installed on vehicles such as trucks, trailers, shipping containers, and railcars. The TRU emissions inventory also includes generator sets (gensets), systems designed to provide electricity to electrically driver refrigeration units (including semi-trailer vans and shipping containers). TRUs are responsible for the safe transportation of the majority of refrigerated goods, including meats, produce, dairy, and certain medicine and chemical products.

The diesel engines that power TRUs and TRU gensets are a significant source of a number of pollutants, but are of particular concern due to the emissions of particulate matter under 2.5 microns in diameter (PM2.5) at locations and facilities where a large number of TRUs operate simulataneously, concentrating their emissions impact in the surrounding communities. The 2019 updates include improvements to TRU populations, annual activity, emission factors, compliance choices under the existing TRU Airborne Toxic Control Measure<sup>1</sup> (ATCM), and growth factors. The updates were developed to provide data for CARB’s 2019 Preliminary Health Analysis of TRUs.

Figure 1 below shows the contribution of PM2.5 from TRUs compared to a number of other freight sources in California, demonstrating the significant role TRUs play in PM2.5 emissions even when compared with some of the largest sources in the state.

**Figure 1: Select Freight Source Category PM2.5 Contribution in 2019 (tpd)**



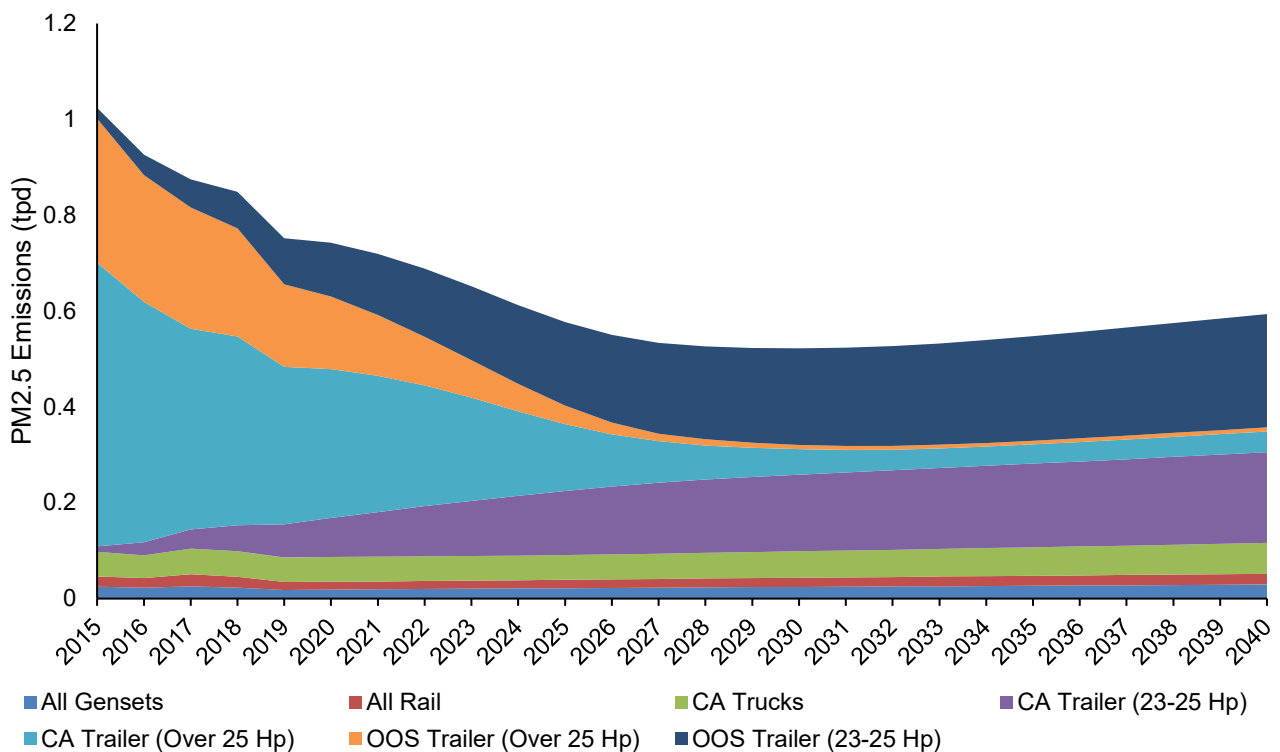
A notable finding when updating the TRU inventory was the emergence of trailer TRUs equipped with engines between 23 and 25 horsepower, in contrast to previous inventories

<sup>1</sup> <https://ww3.arb.ca.gov/diesel/tru/tru.htm>

where all trailer units were over 25 horsepower. Units with under 25 horsepower have standards for particulate matter (PM) **15 times higher** than units with more than 25 horsepower, and emission standards for oxides of nitrogen (NOx) 1.5 times higher. The increase of PM and NOx from engines between 23 and 25 horsepower is very significant as the emergence of these smaller engines will become responsible for the majority of TRU emissions in the near future, if current trends continue.

The emissions trends for PM2.5 from TRUs are shown in Figure 2, by category (NOx emissions are also provided at the end of the report). The 23 to 25 horsepower trailers (in-state trailers in purple and out-of-state trailers in dark red) are forecast to dominate PM2.5 emissions from the category by 2030.

**Figure 2: Statewide PM2.5 from TRUs Under Existing ATCM**



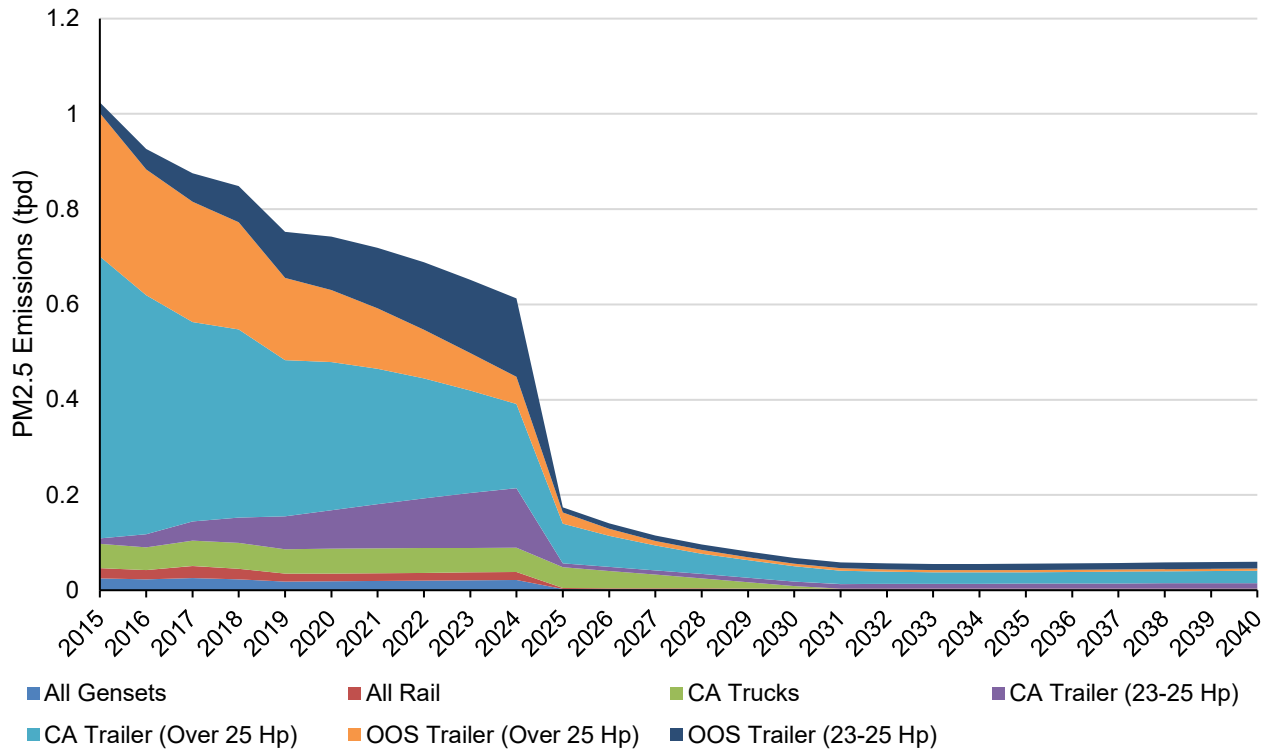
CARB staff is developing the draft concept for the new TRU Regulation (Concept) that will replace the existing TRU ATCM when adopted. CARB staff presented the Concept for comment and discussion at public workshops in August and September 2019. The emissions for PM2.5 under the version of the Concept presented at the workshops are shown below in Figure 3. The Concept results in a large decrease in PM2.5 emissions beginning in 2025.

The Concept includes the following requirements:

- Starting in 2022:
  - All TRUs and TRU gensets that operate in California, regardless of the home state of the unit/company, must register with CARB.
  - All new truck TRUs, trailer TRUs, domestic shipping container TRUs, and railcar TRUs that operate in California must use refrigerant with a global warming potential (GWP)  $\leq 2,200$ .
- Starting in 2023:
  - All applicable facilities (e.g., refrigerated WHDCs, CSWs, grocery stores, truck stops, ports, and intermodal railyards) in California must register with CARB and provide geofence information.
- Starting in 2024:
  - All applicable facilities must complete installation of electrical charging/fueling infrastructure to support zero-emission operation of TRUs.
- Starting in 2025:
  - All truck TRU fleets must turnover at least 15 percent each year (for 7 years) to full zero-emission technology. All truck TRUs must be full zero-emission by 2031.
  - All trailer TRUs, domestic shipping container TRUs, and TRU generator sets must use zero-emission operation if parked or stationary for more than 15 minutes at an applicable facility and be equipped with an electronic telematics system.
  - All diesel engines in trailer TRUs, domestic shipping container TRUs, railcar TRUs, and TRU gensets that operate in California, regardless of horsepower, must meet the more stringent U.S. EPA Tier 4 final emission standard for 25-50 hp engines.



**Figure 3: Statewide PM2.5 from TRUs Under the Concept**



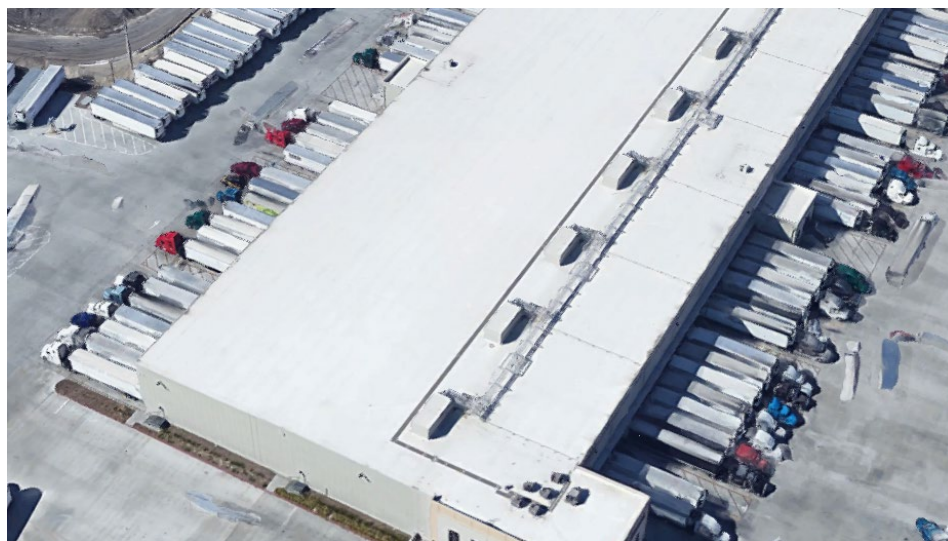
## 2. Background

The previous inventory was released in 2011, and documentation is available online<sup>2</sup>.

TRUs operating in California are subject to the existing TRU ATCM, which generally requires that TRUs meet in-use performance standards seven years after the engine model year. There are several ways to be in compliance with the in-use performance standards, meeting the U.S. EPA Tier 4 final emission standard for 25-50 horsepower engines, installing a Level 3 filter (with at least 85 percent PM control) on the TRU engine, or using a qualifying alternative technology. Compliance may also be maintained by replacing the engine with a cleaner new or rebuilt engine, which would then be in compliance until the seventh year after the replacement engine's model year.

Although TRUs operate across the state, their impact is often concentrated in communities near facilities where dozens of TRUs may be operating simultaneously and continuously. California's anti-idling for trucks does not apply to TRU operations or reduce their emissions. Figure 4 shows an example of a food distribution facility in Southern California.

**Figure 4: Food Distribution Facility**



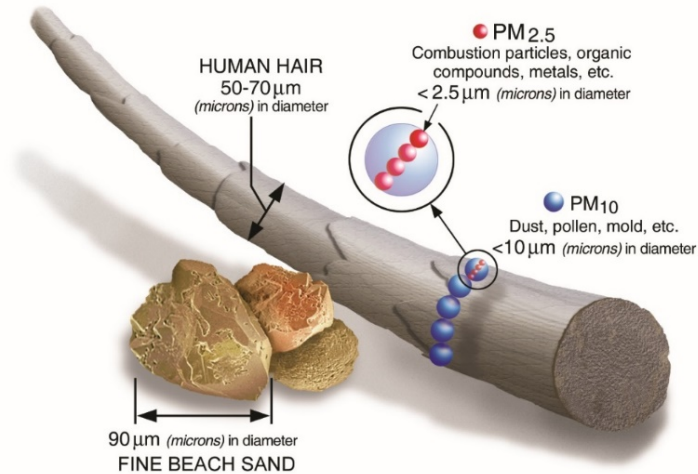
TRUs are a relatively high source of PM due to the lack of tight controls for particulate matter in the new engine standards for smaller diesel engines (see Section 3.1 below). These ultrafine particles are significantly smaller than most dust, pollen, and other sources of particulates, as shown in Figure 5.

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<sup>2</sup> <https://ww3.arb.ca.gov/msei/ordiesel.htm>

More information on the health risks associated with PM<sub>2.5</sub> is available on CARB's website<sup>3</sup>.

**Figure 5: Particulate Matter Size Comparison**



## 2.1. TRU Categories

TRU categories are determined based on the type of truck or container they are cooling (such as a single body truck, trailer, shipping container, or railcar) and the horsepower of the TRU. These groupings are important in identifying average horsepower, load factor, activity, percent of time spent in California, and turnover and purchasing habits.

**Truck TRU:** TRUs used to cool all types of single body trucks are referred to as truck TRUs. Generally, truck TRUs have between 7 and 19 horsepower, with an average of 13.9 horsepower. These trucks are generally used for local and regional delivery, and are assumed to be captive, meaning they do not leave California and all activity is within the state.

**Trailer TRU:** Trailer TRUs are the most common TRU type, and are attached to trailers pulled by semi-trucks. Traditionally all trailer TRUs were rated between 25 and 35 horsepower. However, in the last few years, numerous trailer TRUs were produced with engines between 23 and 25 horsepower. Trailer TRUs are further divided in:

**California Trailer TRU:** These TRUs are registered to a company or agency based in California and are required to register in the CARB Equipment Registration Program (ARBER)<sup>4</sup>. California trailer TRUs are often used in long-haul transport

<sup>3</sup> <https://ww3.arb.ca.gov/research/aaqs/pm/pm.htm#1>

<sup>4</sup> <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit>

and are not captive to California, since they often visit other states to deliver or bring in trailer loads. A majority of their activity is assigned to California.

**Out-of-State Trailer TRU:** These TRUs are not registered to a company based in California and may voluntarily register in the ARBER database. A small fraction of their activity is assigned to California.

**Railcar TRU:** These TRUs supply refrigeration to railcar containers and are pulled by locomotives. A small fraction of their time is spent in California.

**TRU Genset:** These TRUs are a genset that provides power to a non-integrated refrigeration unit. Similar to trailer TRUs, most TRU gensets were previously rated above 25 horsepower, but recent data from the ARBER database shows a majority of gensets now sold are 23 to 25 horsepower engine units. Again, there are two subsets of TRU gensets.

**California TRU genset:** TRU gensets are registered to a company based in California with reporting requirements in the ARBER database. Similar to trailer TRUs, a majority of their activity is assigned to California.

**Out-of-State TRU genset:** These are TRU gensets that are not registered to a company based in California, and may voluntarily report in the ARBER database. A small fraction of their activity occurs in California.

## 2.2. Emissions Inventory Methodology Overview and Sources

The following steps summarize the inventory process and identifies the data source, with more detail included later in the report:

1. ARBER supplies TRU population data, including model year, horsepower, and any reported aftertreatment information
  - a. Population data is scaled up based on CARB enforcement data that indicates not all TRUs report in ARBER (e.g., 96.3% of TRUs are assumed to be reported in ARBER database).
  - b. Out-of-State TRUs are scaled up based on heavy duty truck populations from EMFAC model as they have voluntary reporting requirements.
2. Activity is assigned based on survey data and TRU telematics reports. Activity is distributed for portion of time spent in-state vs out-of-state for trailer TRUs, railcars, and gensets based on VMT patterns for in-state versus out-of-state trucks.
3. Load factors are assigned by TRU category, using analysis from the 2011 inventory and supplemented by TRU telematics reports. TRU efficiency improvements in some categories are reflected in this step.

4. Future years are forecasted by applying a growth rate, along with a survival and purchasing curve based on reported age distributions.
5. Forecasted compliance with the existing TRU ATCM is based on observed compliance choices in the ARBER database and data from CARB's enforcement program.
6. Emissions are calculated for base and future years using Equation 1.

$$\text{Emission} = \text{Population} * \text{Activity} * \text{Hp} * \text{LF} * \text{EF} * \text{FCF} \quad (\text{Equation 1})$$

Where:

Population =	Count of equipment population
Activity =	Time the engine is running (hours)
Hp =	Horsepower (max brake horsepower) of the engine
LF =	Load factor (unit-less)
EF =	Emission factor (grams/kW-hr) specific to horsepower and model year and pollutant, and includes deterioration
FCF =	Fuel correction factor (unit-less) based on calendar year

### 3. TRU Data Base Year Inputs and Analysis

This section discusses data sources and analysis for the TRU emissions inventory model, including population, activity, load factor, and emission factors. These inputs are the foundation of the model, and all forecasted years are built on this base year data.

#### 3.1. Population and Age Distribution

The ARBER database provides a record of California-based TRUs, and a partial record of TRUs that entered the state but were not based in California. Under the TRU ATCM, owners of TRUs based within California are required to report their TRUs to the ARBER database, with an initial reporting deadline of July 31, 2009. Owners of TRUs that are based outside California may report their TRUs, but are not required to do so.

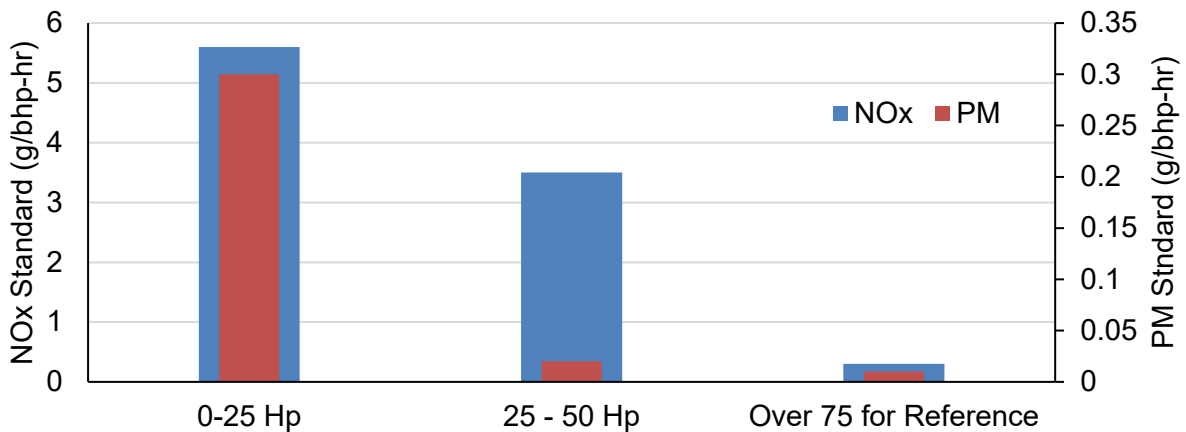
The ARBER database maintains reported information for each TRU, including the unit's model year, the engine model year, and any actions taken such as a DPF installation or engine replacement or rebuild. The database does not include information on annual activity, the amount of fuel used, or the load factor. As such, ARBER data can be used to analyze population and age distributions, but not activity.

Data from the ARBER database was retrieved on March 1, 2018, and is the primary input to estimate TRU population and age distribution in the 2019 TRU inventory.

The largest change in this new data set is the emergence of 23 to 25 horsepower trailer TRU engines. Figure 6 compares the difference in NO<sub>x</sub> and PM emission factors (in grams

per brake-horsepower-hour) according to horsepower groupings. In the 2011 inventory, all trailer TRUs had engines ranging between 25 to 50 horsepower. Figure 6 includes diesel engines over 75 horsepower for reference, although they are not in the inventory. The diesel engines under 25 horsepower have significantly higher PM emissions standards because they lack diesel particulate filters (DPFs) and they have higher NOx emission standards as they also lack selective catalytic reduction systems (SCRs). Diesel engines between 26 and to 50 horsepower are expected to have DPFs or similar, and no SCRs. For comparison sake only, most diesel engines above 75 horsepower are expected to have DPFs and SCRs, or equivalent emissions reduction.

**Figure 6: Tier 4 Final Standards for Off-road Diesel Engines by Horsepower Bin**

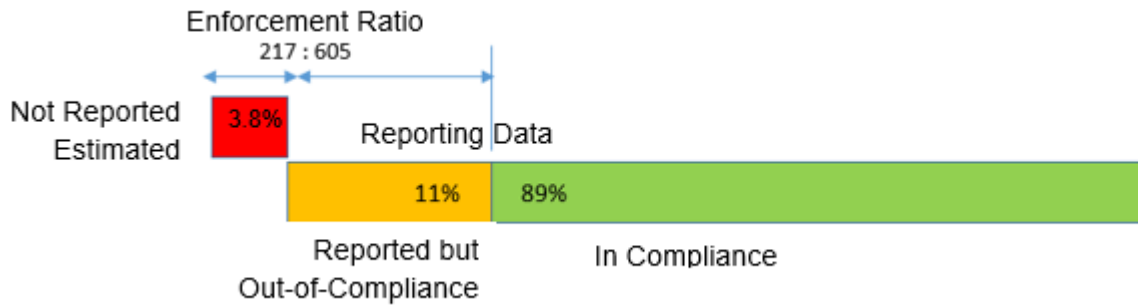


**3.1.1. Population and Non-Reporting**

Although TRUs based in California are required to report in ARBER, there is some level of non-compliance with this reporting requirement. Based on CARB enforcement data from 2009 and 2010, the previous 2011 model scaled up California units registered in ARBER by 3.12 percent to correct for those units that were not registered. New calendar year 2016 CARB enforcement data for TRUs were used to update the non-reporting factor in the 2019 inventory.

According to CARB’s 2016 enforcement data, non-compliance due to non-reporting was responsible for 217 violations, while non-compliance due to other issues was responsible for 605 violations. Essentially, for every three TRUs out of compliance for issues other than reporting, one was out of compliance for failure to report. The 2018 ARBER reporting data indicates that compliant TRUs account for 89 percent of the population. Therefore the remaining reported but non-compliant TRUs account for 11 percent. By applying the same ratio for non-reported units to reported but non-compliant units, the 3 to 1 ratio can be multiplied by the 11 percent of non-compliant TRUs in the 2018 ARBER database. This results in a non-reporting rate of 3.75 percent, as shown in Figure 7 below.

**Figure 7: Determining TRU Non-Reporting Rates**



**3.1.2. TRU Genset Age Distribution Adjustments**

According to information from TRU genset owners and operators, as well as CARB staff, many TRU gensets deemed non-compliant with the existing ATCM remain registered in ARBER even though they are no longer brought into California. This was verified with data supplied by the TRU genset companies as they have an electronic tracking program. The inventory reflects this practice by removing non-compliant TRU gensets (those older than 7 years of age) from the base population from the ARBER dataset, for both in-state and out-of-state TRU gensets.

Figure 8 shows the age distributions before this adjustment, with all units older than 7 years of age removed following the compliance adjustment.

**Figure 8: TRU Genset Age Distribution Before Adjustment**



**3.1.3. Out-of-State TRU Population Scaling**

Out-of-state TRUs are not required to report to ARBER, meaning the reporting data represents only a fraction of the total population of out-of-state units. To estimate the entire population of TRUs visiting California each year, the inventory uses the ratio for in-state versus out-of-state trucks from CARB’s on-road mobile source emissions inventory, EMFAC2017<sup>5</sup>. Trucks used in the analysis were limited to T6 and T7, or medium to heavy duty truck types as those are most likely to pull a refrigerated trailer.

Table 1 shows the in-state and out-of-state truck populations in a calendar year, and the ratio between the categories. Based on this analysis, the out-of-state trailer TRU population was scaled up to equal the number of California trailer TRUs multiplied by the ratio 3.64.

<sup>5</sup> EMFAC2017, <https://www.arb.ca.gov/emfac/2017/> - To replicate this analysis using CARB’s EMFAC output, out-of-state trucks were defined as: T6 OOS heavy, T6 OOS small, T7 NNOOS, T7 NOOS. In-state trucks were defined as T6 Ag, T6 CAIRP heavy, T6 CAIRP small, T6 instate heavy, T6 instate small, T7 Ag, T7 CAIRP, T7 Single, T7 tractor.



This creates a target population of out-of-state TRUs of 131,160 (or 3.64 times the in-state population of registered TRUs).

**Table 1: Instate and Out-of-State (T6 and T7) Truck Populations from EMFAC2017**

<b>Truck Category</b>	<b>Population</b>
Out-of-State	32,641,822
In-state	8,974,689
Ratio of Out-of-State / In-state	3.64

Age distribution, after-treatment, and other characteristics were modeled using reporting data for out-of-state units. However, the total out-of-state TRU population was scaled up to 131,164, from approximately 58,540 seen in the reporting data. This equates to about 45 percent of the estimated out-of-state TRU fleet voluntarily reporting.

#### **3.1.4. Railcar and DSC**

At the time of the 2011 inventory release, only 990 railcars were registered in ARBER, although the Umler system<sup>6</sup> recorded 7,900 refrigerated railcars in operation within California. The Umler system is an electronic database by Railinc that collects and maintains TRU data, described further in the 2011 inventory report. (These railcar TRUs are not in violation of reporting requirements as railcar owners outside California may voluntarily report to ARBER.) In 2018, about 2,000 railcars were registered in ARBER, an increase but still a subset of the total statewide estimate. To estimate the 2018 railcar TRU population that visited California, the inventory applies growth factors to the 2011 railcar TRU population.

The 2018 ARBER population of domestic shipping containers (DSC) reports about 400 units with an average age of 4.3. These are included in the 2018 railcar population, based on discussion with industry indicating that DSCs and railcars have similar operational practice. They both are used almost exclusively by large companies, are not captive to California, are reported voluntarily, and spend only a small fraction of time in California. Based on the limited amount of data available for these categories, the out-of-state TRU age distribution was used for this category, similar to the 2011 inventory

#### **3.1.5. 2018 Population and Age Distribution**

Table 2 gives population and average age for each TRU category after scaling adjustments.

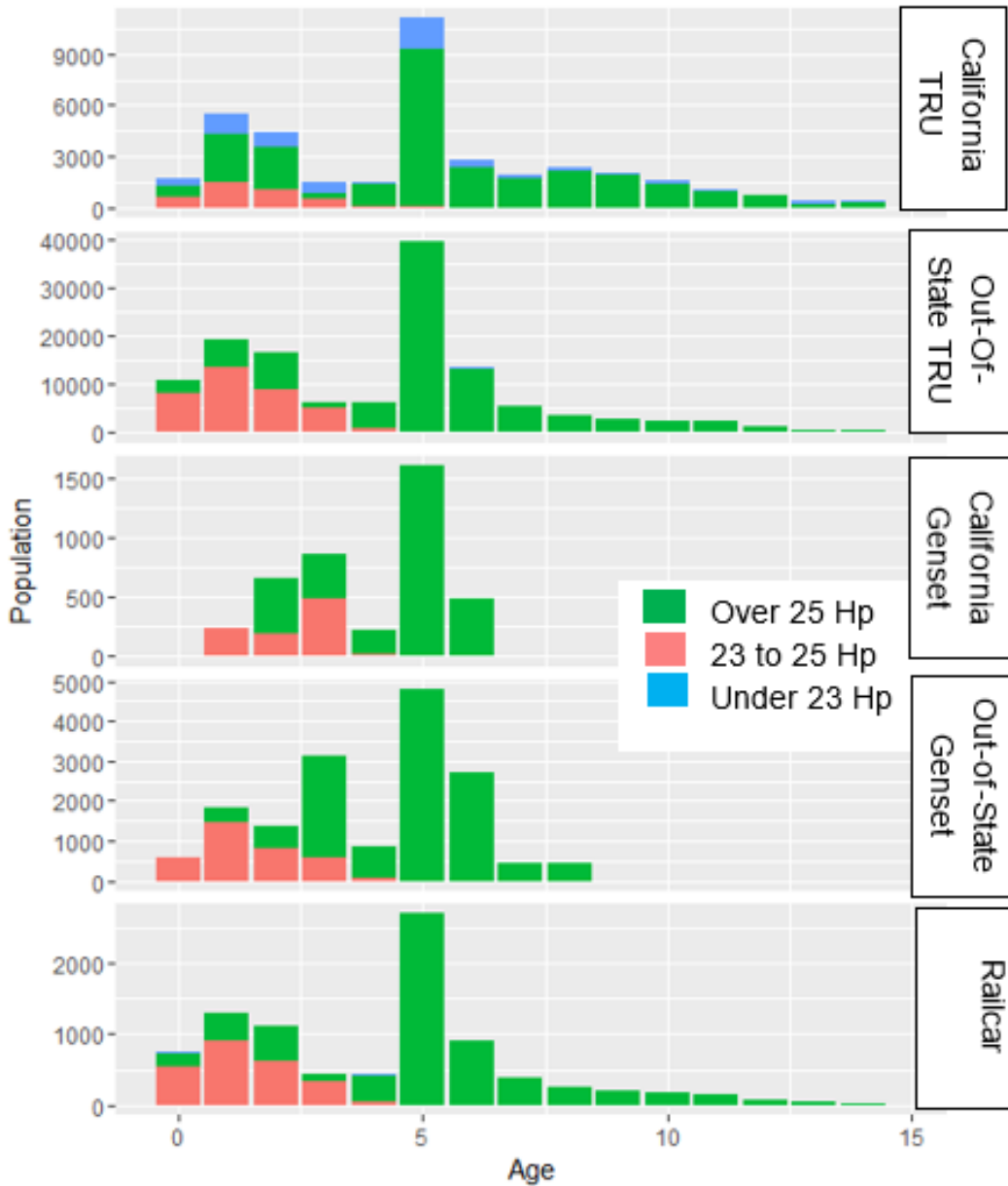
<sup>6</sup> The Umler system by Railinc, <https://www.railinc.com/rportal/umler-system>

**Table 2: 2018 Population and Average Age by Category**

<b>Category</b>	<b>Population</b>	<b>Average Age (years)</b>
California-based TRU	39,938	5.1
Out-of-state TRUs	131,164	4.2
California-based TRU genset	4,074	3.9
Out-of-state TRU genset	16,200	4.0
Railcar and DSC	8,975	4.2

Figure 9 displays the base year 2018 age distributions by category. The conspicuous spike at age five, or model year 2012, corresponds to a regulatory deadline in the existing TRU ATCM as well as the last available year of Tier 4i engines in the 23 to 25 horsepower range. It should be noted the low age of units between 23 and 25 horsepower is not indicative of high turnover, but a result of their recent emergence in the market.

**Figure 9: Base Year TRU Age Distribution by Category**



**3.2. Engine Model and Average Horsepower**

To determine the engine horsepower for each unit reported in ARBER, the inventory matches the engine model to the manufacturer’s horsepower rating. ARBER’s engine model input field is an open text field, so typed responses varied. As such, algorithms were used to verify the engine model. For example, the common model TK486V is often entered as "486 v", "486\_v", "tk-486 v", "486 tkv", "tkv486", "tk48v6", and approximately 272 other variants.

Table 3 reports average horsepower for each TRU category and the engine horsepower bin. The average horsepower for each category is weighted by the population of each engine model in the reporting data. Only California-based TRUs have a group for units under 23 horsepower because all single body trucks are assumed to be California based units, and all trailer units are over 23 horsepower.

**Table 3: Average Horsepower by Category**

<b>Category</b>	<b>Average Horsepower: Below 23 Hp Bin</b>	<b>Average Horsepower: 23 to 25 Hp Bin</b>	<b>Average Horsepower: 25 Hp and Over Bin</b>
<b>California-based TRU</b>	17.2	24.8	33.8
<b>Out-of-state TRU</b>	-	24.7	33.7
<b>California-based genset</b>	-	24.8	33.2
<b>Out-of-state genset</b>	-	24.8	33.2
<b>Railcars</b>	-	24.7	33.7

### 3.3. Annual Activity

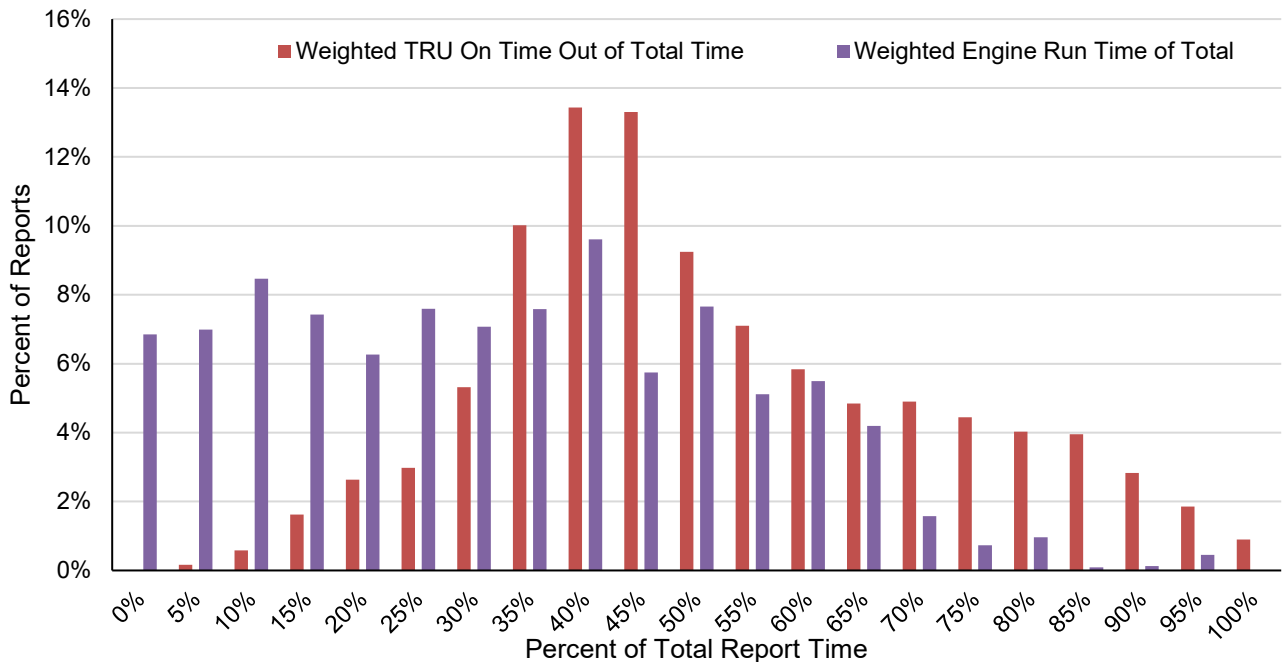
In the 2011 inventory, annual activity was based on a facility survey. The survey covered 54 different facilities that monitored TRU activity and provided the average total TRU activity, annually. For example, if a TRU visited a facility twice, one week apart, and had accumulated a total of 30 hours in that time, that TRU would be scaled up by 52 weeks to estimate 1,560 hours of annual use. The results from that survey are described in detail in the 2011 inventory analysis, which determined trailer TRUs had an average annual activity of 1697 hours and 1,360 hours per year for truck TRUs.

For this 2019 TRU inventory update, CARB acquired telematics data from a number of trailer TRUs, detailing total time, time the unit (but not engine) was on, time the engine was on, whether the trailer was stationary or moving, and (in limited cases) the fuel use. The telematics data generally was recorded every 15 minutes, showing the changes in time, engine on time, and other metrics from the last recorded point. For example, one entry data point might show 900 seconds passing (15 minutes), with 900 seconds (15 minutes) of unit on time and 360 seconds (6 minutes) of engine on time during those 15 minutes.

After significant quality assurance, 811 telematics reports were used, representing 867,300 hours or 99.0 years of total time passing (engine on or not), and 285,000 hours of engine run time. The TRU unit was on (engine running or not running) for an average of 51.8 percent of total recorded time, equivalent to 12.4 hours per day, or 4,500 hours per year.

The engine was running for an average of 32.8 percent (weighted by total time of each report), equivalent to 7.9 hours per day, or 2,876 hours per year (the average percent of engine time-on **not** weighted by time was 32.5 percent, showing the data was not significantly influenced by outliers.) Figure 10 compares the distribution of TRU on time (colored in red) and engine on time (colored in purple). The red bars represent the percent of time the unit was turned on and purple bars represent the percent of time the engine was running. The telematics data show that the TRU engines are generally running about 62.5 percent of the time that a TRU unit is turned on.

**Figure 10: Telematics Data: TRU Unit On and Engine On**



The telematics data, although detailed in temporal information, did not provide information on TRU models, ownership, or other variables to determine if the activity data represented all TRU operation in the state. To incorporate the telematics data while not overinflating the total activity statewide (from the many units potentially not represented by the telematics data), the 2011 facility survey data and the 2018 telematics data were combined to determine average TRU activity.

For each data source, CARB weighted the percent of engine time on by the duration of the report, to calculate a time-weighted average of engine run time. From the 2011 facility survey data, each facility was weighted by the number of trailer TRUs and multiplied by the average time period for a TRU report. Each telematics datapoint represents a single unit, and was weighted according to the length of that telematics report. Table 4 shows how the following two example facility reports and two telematics datapoints would be averaged to calculate TRU average on time rate.

**Table 4: Example TRU Activity Average Calculation**

<b>Data Source</b>	<b>Number of TRUs</b>	<b>Average Time Period of Reports</b>	<b>TRU On Time Average for Facility</b>	<b>Total TRU Days</b>	<b>Average Rate: TRU on time</b>
<b>Facility 1 Report</b>	50	10 day average	20%	50 x 10 = 500 days	500 days x 20 Percent
<b>Facility 2 Report</b>	10	5 day average	30%	10 x 5 = 50 days	50 days x 30 Percent
<b>Telematics 1 Data</b>	1	60 days	35%	1 x 60 = 60 days	60 days x 35 Percent
<b>Telematics 2 Data</b>	1	100 days	40%	1 x 100 = 100 days	100 days x 40 Percent
			<b>TOTAL</b>	710 days	24.8 Percent Weighted Average

This can also be expressed in the calculation as follows:

$$\frac{[(500 \text{ days} \times 20 \text{ percent}) + (50 \text{ days} \times 30 \text{ percent}) + (60 \text{ days} \times 35 \text{ percent}) + (100 \text{ days} \times 40 \text{ percent})]}{710 \text{ total days}} = \text{Average of 24.8 percent of time on.}$$

Based on the average time-on of 24.8 percent, the annual activity would be 24.8 percent of 365 days per year, 24 hours per day, or 2,170 hours per year.

This methodology gives higher weight to the facilities with larger number of units, reporting over a longer period, and to telematics data recorded over a longer period. Facility reports with few units, or a short time period between reports, and telematics data recorded over a short period, have little impact on average activity.

Table 5 and Table 6 show the results and overall information on the facility surveys, telematics data, and resulting activity average

**Table 5: Trailer TRU Activity Data Sources and Average**

<b>Data Source</b>	<b>TRU Hours Represented</b>	<b>TRU Units Represented</b>
Facility Survey	1,197,382	6,035
Telematics Data	867,368	811

**Table 6: Trailer TRU Activity Average**

<b>Data source</b>	<b>Percent of Engine Time</b>	<b>Average Annual Hours</b>
Facility Survey	19.5%	1,712
Telematics Data	32.8%	2,876
<b>Overall Average (Time Weighted)</b>	<b>25.1%</b>	<b>2,201</b>

The final result is an average trailer activity about 42 percent weighted toward the new telematics data, and 58 percent weighted to the facility survey, based on total TRU hours represented by each.

Telematics data for truck TRUs were not available in any statistically significant quantity, so facility survey results were used and unchanged from the 2011 inventory. The facility survey represented 459 trucks, with an average activity of 1,360 hours per year.

Gensets and railcars are also unchanged from the 2011 inventory, at 1,000 hours annually for both categories. This is based on discussions with genset and railcar owners and TRU program staff in 2009 and 2010, and described in full in the 2011 inventory report.

### **3.4. Portion of Activity Within California**

The trailer, genset, and railcar TRU populations have activity split between California and other states or countries. Truck TRUs, generally assigned to local or regional delivery duties, are assumed to be captive to California. Therefore, all truck TRU hours are assumed to be within California.

The division of activity for the trailer, genset, and railcar TRUs, is based on the same general methodology as the out-of-state trailer TRU population. The TRUs are modeled on the truck activity patterns from EMFAC2017, for the categories of freight trucks that are associated with refrigerated trailers or refrigerated transport (see Footnote 5).

The International Registration Program (IRP) tracks vehicle miles traveled (VMT) for interstate trucks entering California, so it is possible to determine the percent of annual VMT both inside and outside of California in an average year. VMT for out-of-state trucks is 12.4 percent of total VMT, meaning approximately 1 out of 8 every miles driven is within California.

California-based trucks in EMFAC also include California IRP trucks (trucks based in California but registered in IRP, that spend a significant portion of VMT outside of the state). Overall, VMT for California based freight trucks is approximately 78 percent in California and 22 percent outside California.

Table 7 lists total annual hours, hours within California, and compares this against the previous inventory estimate of hours spent within California.

**Table 7: TRU Activity Totals and Instate Totals**

<b>Category</b>	<b>2019 Model Annual Hours</b>	<b>2019 Model Annual Hours Within California</b>	<b>2011 Model Annual Hours Within California</b>
California Trailer TRU	2,201	1,719	1,325
Out-of-state Trailer TRU	2,201	272	210
Truck TRU	1,360	1,360	1,360
California Genset	1,000	781	781
Out-of-state Genset	1,000	124	124
Railcar	1,697	322	322

### 3.5. Moving and Non-Moving Time Periods

The telematics data also included stationary and moving time for TRUs. Data was limited to include whether the trailer was moving for the entire period of the report (generally 15 minutes), was stationary the entire time, or had some portion moving and some stationary. The telematics data also included information that determined the engine on-time during these periods.

The period where the trailer was moving only a portion of the time could represent anything from a trailer arriving a location in the middle of a recording interval, to traffic conditions that had significant start and stop movement, to several very short stops during the period. Unfortunately, this data can only definitively determine that total stationary time for trailer TRUs makes up between 33 and 65 percent of all engine on time (65 percent is the 33 percent stationary lower limit plus the possible 32 percent that could also be stationary). In short, 33 percent represents a lower limit, and 65 percent an upper limit.

**Table 8: Trailer TRU Stationary Activity Analysis**

<b>Movement Category</b>	<b>Hours</b>	<b>Percent</b>
Stationary with Engine On	96,900	33%
Split Stationary/Moving with Engine On	94,598	32%
Moving with Engine On	105,103	35%

An equal split of the portion where the TRU movement could not be quantified would place 49 percent of the total TRU engine time as stationary and 51 percent of TRU engine time as taking place during truck movement. This compares reasonably well with the 2011 inventory split of 50 percent time stationary and 50 percent time moving. This information informs both the spatial distribution of TRU emissions as well as the total hours at a facility per year, but does not change the total emissions in the state.



### 3.6. TRU Load Factor (LF)

Table 9 provides the 2011 inventory load factors. The methodology behind these load factors is described in detail in the 2011 inventory documentation, and is generally based on a combination of engine certification cycle data and engine torque and speed curves.

**Table 9: 2011 TRU Inventory Load Factors**

Model	Horsepower Bin	Load Factor
TRU (California-based and Out-of-State)	25-50	0.46
TRU	11-25	0.56
TRU	< 11	0.56
Generator set	All	0.33
Railcar	All	0.46

The telematics data described previously did include limited data on fuel use by TRUs. Fuel data from the telematics report were recorded 3.6 percent of the time, but still comprises slightly over 36,400 hours of fuel use consumption data. A load factor can be calculated from this fuel use, with a number of assumptions built in.

Generally, the equation for fuel use in off-road diesel inventories is:

$$\text{Fuel Use} = \text{Horsepower} * \text{Hours} * \text{Load Factor} * \text{Fuel Consumption Rate (Equation 2)}$$

Therefore, load factor can be determined if the other variables are known. In the telematics data, specific engine model data or horsepower information is not available. However, the vast majority of the telematics data is from trailer TRUs. The telematics data was based on 2016 to 2017 data, a time period when 23 to 25 horsepower TRUs were being sold but made up a small fraction of market share. For this analysis, CARB assumed the TRUs were of average horsepower for trailers over 25 horsepower (i.e., 33.8 hp). The fuel use rates were based on US EPA<sup>7</sup> values for engines of 25 to 50 horsepower, or 0.408 lb/hp-hr.

Using this data, it is possible to determine a time-weighted load factor of 0.467, which compares favorably with the 2011 TRU inventory load factor for trailers of 0.46. As there is no significant difference between this newly calculated load factor and the previous factors, the 2019 TRU inventory will continue to use the 2011 load factors, with one minor difference.

Based on discussions with manufacturers, TRU engines have improved efficiency between 2011 and 2019, with the largest improvements beginning around 2013. The primary

<sup>7</sup> [https://ww3.arb.ca.gov/msei/ordiesel/usepa\\_bsfc.pdf](https://ww3.arb.ca.gov/msei/ordiesel/usepa_bsfc.pdf)

evidence for this trend can be seen in the published data on fuel per hour consumption from manufacturers. Beginning in 2013, the inventory reflects a load factor reduction of 17 percent to simulate efficiency improvement for the 2013 and newer trailer TRUs. For units between 23 and 25 horsepower, the efficiency improvement is used to reduce the engine brake horsepower rating, and thus these units hold the same load factor as earlier trailer TRU units. A reduction in the load factor of 17 percent for the 25 to 50 horsepower units results in the same total effective power (maximum horsepower multiplied by the load factor) for all 2013 and newer trailer units, either above 25 horsepower or below 25 horsepower.

The telematics data, in theory, could show a lower load factor due to these efficiency improvements. However, during the time the telematics data was collected, only around 20 percent of TRU units were 2013 or newer. A 17 percent efficiency improvement in 20 percent of units would only show up as a 3.4 percent reduction overall in load. This minor reduction was not seen in the telematics data, possibly due to the majority of TRU units being pre-2013 model year, or simply due the magnitude of the reduction falling within the margin of error.

The model assumes no efficiency improvement for engines below 23 horsepower, as no supporting information was available. Table 10 shows the previous and new load factors.

**Table 10: 2019 Load Factors**

<b>Category</b>	<b>Below 23 hp</b>	<b>Between 23 and 25 Horsepower: (All Years)</b>	<b>Over 25 Horsepower: 2012 and Older</b>	<b>Over 25 Horsepower: 2013 and Newer</b>
<b>California TRU</b>	0.56	0.46	0.46	0.38
<b>Out-of-State TRU</b>	-	0.46	0.46	0.38
<b>California Gensets</b>	-	0.33	0.33	0.27
<b>Out-of-State Genset</b>	-	0.33	0.33	0.27
<b>Railcars</b>	-	0.46	0.46	0.38

### **3.7. Emission Factors (EF)**

The model utilizes a combination of the 2017 emission factors<sup>8</sup> for all diesel engines and a new analysis for engines certified to the TRU-specific certification cycle. The general off-road 2017 emission factors were developed based on certification test data covering all off-road diesel engines. The TRU-specific emissions factors were developed by including only tests based on TRU-specific certification cycles, and then weighting these tests using the engine families reported in ARBER. The TRU specific certification data are only available

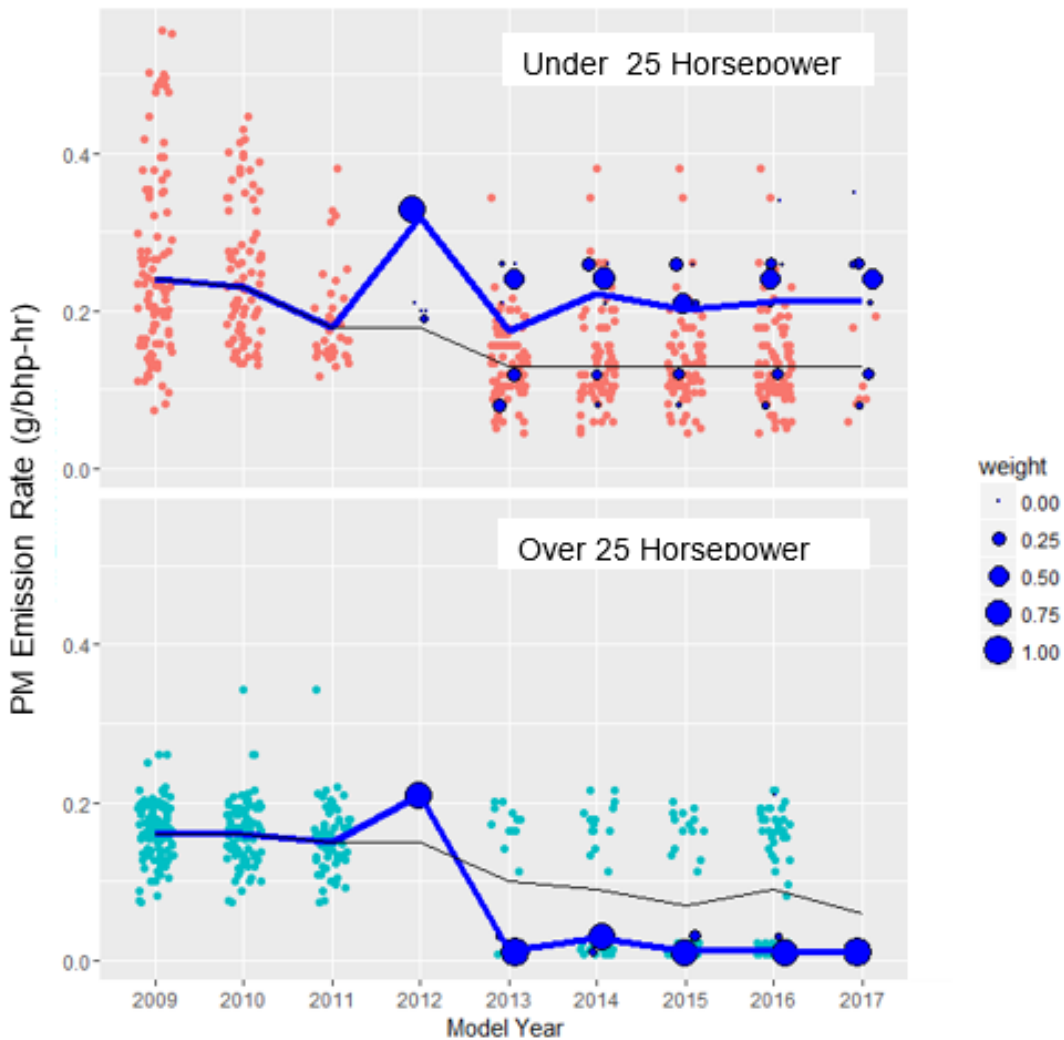
<sup>8</sup> 2017 Emission Factors, <https://ww3.arb.ca.gov/msei/ordiesel.htm>

for PM and engine model years 2012 and newer. Therefore, the adjustment is made for PM only for engine model year 2012 and after and no adjustments are made for NOx.

Each red data point in Figure 11 represents a general off-road diesel engine family. The fine black solid lines represent the overall off-road diesel emission factors (used in other categories).

Each blue data point represents a TRU specific engine family. The size of the blue dot represents market share of the engine family. The solid blue line is the TRU specific PM emission factor and is derived by taking a population weighted average of the blue data points. The TRU specific PM emissions factors for engine model 2018 and after are estimated by average of 2014 to 2017 data points.

**Figure 11: PM Emission Factor Comparison**



Notable is the fact that over 25 horsepower TRUs have PM emissions from certification below the average for off-road diesel engines, while engines under 25 horsepower have emissions significantly above the average for off-road diesel engines.

#### 4. Forecasting and Growth

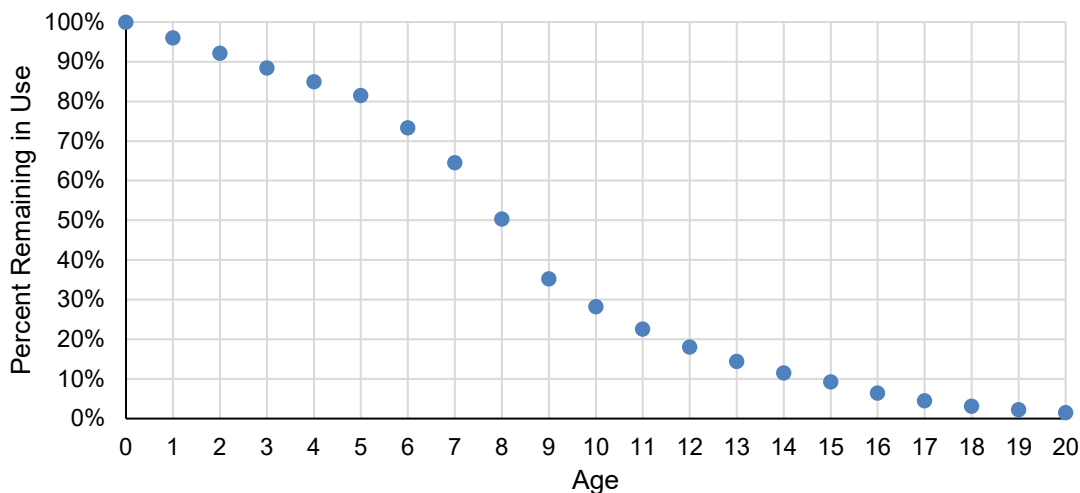
##### 4.1. Population Forecast

The 2019 TRU model forecasts future year population distributions in any given year by applying a series of actions to the previous year’s population, in an iterative process (i.e. 2019 population is based on base year 2018, and 2020 is based off iterations on 2019, and so on). There are three distinct steps in this process: turnover, growth and purchasing, and compliance. In the first step, the model estimates the number of units that will likely retire in the year utilizing the survival curve, which characterizes the retirement behavior for different ages. Then newly purchased units are calculated to reflect the population growth. Lastly, the population is adjusted by compliance actions such as forced retirement and/or replacement, based on enforcement and reporting data for real world compliance choices over the past 7 years. The following subsections cover model parameters used for these steps.

##### 4.2. Population Turnover

Population turnover, or survival curves, describe what percent, on average, of purchased equipment are still in service after a set amount of time. Figure 12 shows a survival curve, which indicates the percent of the population still in service at each age, out to age 20. At age 3, 90 percent are still in service. By age 8, 50 percent are in service. By age 20, all are retired from service.

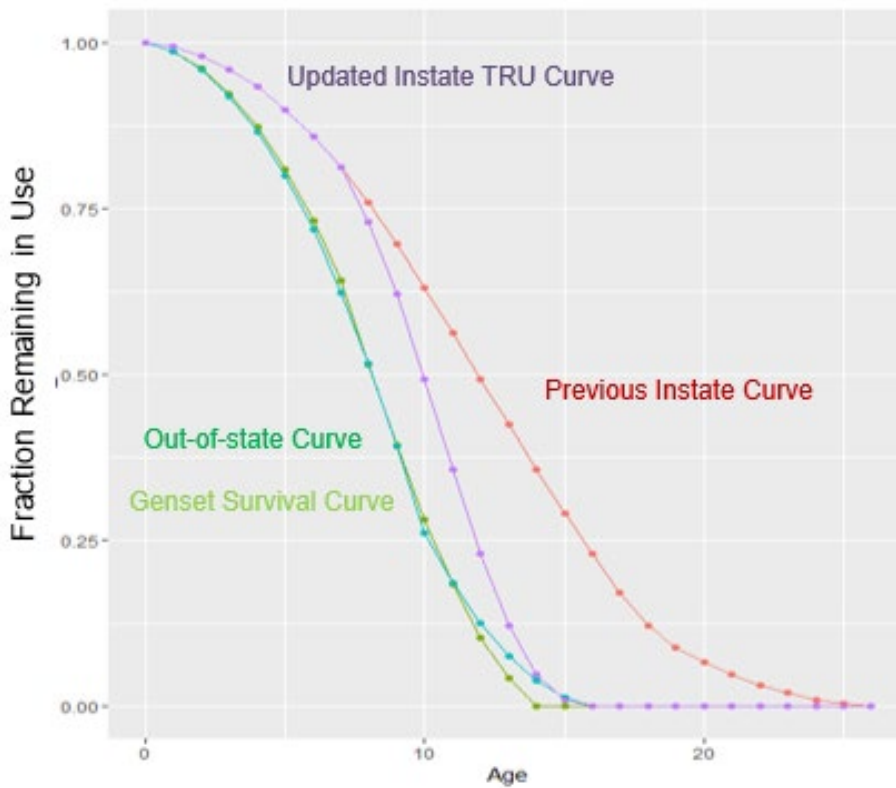
**Figure 12: Example Survival Curve**



Survival curves are based the 2011 inventory model, with one significant adjustment. The general methodology for developing the survival curves is described in the 2011 inventory documentation, however it can generally be described as an iterative process where the previous decades of TRU sales data was compared to the 2011 inventory age distribution (as reported in ARBER). The goal of survival curve application was finding a curve that could be applied to sales data and resulted in the real world age distribution seen in the reporting data. The in-state and out-of-state populations have different survival curves, as out-of-state TRUs are significantly younger and are retired at a younger age, on average.

The adjustment to the 2011 survival rates came from comparing the in-state survival curve to the age distribution shown previously in Figure 9. While the survival curve extends to 25 years, the existing age distribution shows no units older than 15 years. Although the TRUs have been subject to a regulation, units older than 7 years with no aftertreatment are not in compliance, meaning there is no reason to suspect that age 10 and older units are retiring primarily due to the TRU ATCM (as they are already out of compliance, or are already in compliance via aftertreatment and do not need to retire to meet regulatory requirements). To reflect this shift in retirement patterns, the new survival curve reaches zero at approximately 16 years, instead of the previous 25 years. The survival curves for different TRU populations are shown below in Figure 13.

**Figure 13: TRU Survival Curves**



### 4.3. Purchasing Trends

After applying the survival curve, the inventory models new purchases that replace or are added to the TRU fleet. Based on the March 1, 2018 reporting data, the inventory reflects new purchasing with age either 0 or 1, with the split based on new registrations in the ARBER reporting database.

New purchases for units with a 25 to 50 horsepower engine meeting the Tier 4 Final emission standards for MY 2013 and newer are classified as ULETRU (Ultra-low emission TRU) and no further compliance action is required for these units. For engine horsepower below 25, the model assumes no Level 3 retrofit device installed at the time of purchase, again based on reporting data.

For the trailer, rail, and TRU gensets, the percent of new units purchased with 23 to 25 horsepower engine bin was based on the reporting data from ARBER. In-state TRUs show that, on average, 60 percent of units have greater than 25 horsepower engines, and 40 percent have engines between 23 and 25 horsepower. All other units show that only 20 percent of TRU purchases have engines greater than 25 horsepower, and 80 percent have engines that are between 23 and 25 horsepower. At the time of this inventory, all new gensets registered were in the 23 to 25 horsepower range, however the data does not include enough years to be certain this is an ongoing trend. Future inventories will revisit this metric to determine the impact and longevity of trailer, rail, and genset units in the 23 to 25 horsepower range.

**Table 11: New Purchasing by Horsepower Bin**

<b>Category</b>	<b>Before 2015 25+ HP / 23-25 Hp</b>	<b>2015 25+ HP / 23-25 Hp</b>	<b>2016 and after 25+ HP / 23-25 Hp</b>
California Based TRU	100 / 0	70 / 30	60 / 40
Out-of-State TRU	100 / 0	20 / 80	20 / 80
California Based Genset	100 / 0	20 / 80	20 / 80
Out-of-state Genset	100 / 0	20 / 80	20 / 80
Rail	100 / 0	20 / 80	20 / 80

### 4.4. Compliance Choices

Following the application of survival curves and purchasing functions in the inventory, the inventory applies compliance choices for TRUs subject to the existing TRU ATCM. The existing TRU ATCM requires that fleet owners/operators take actions to reduce diesel particulate emissions once the engine becomes seven years old. Fleet owners have the choice of replacing the TRU unit, installing a retrofit device, or using alternative technology such as electric standby to allow the unit to run on supplied electric power while at a facility.

The compliance paths for TRUs include;

- Install level 3 retrofit;
- Install alternative technology;
- Replace unit with a new TRU with current MY engine.

In the 2018 reporting reporting data, 86.2 percent of over 25 horsepower units were in compliance (due either to age or actions taken), and 95.4 percent of units under 25 horsepower were in compliance, with an overall compliance rate of 89.0 percent.

For many owners of TRUs, both company and individuals, one of the primary compliance paths is the replacement of TRUs with newer units, or shifting older TRUs out of the state and maintaining a fleet under 7 years of age. These actions are represented in the age distribution and are not identifiable specifically as compliance choices (i.e. there is no way to differentiate all of these actions from the normal course of business). This compliance choice is implicit in the overall 89.0 percent compliance rate (e.g. these TRUs show up as newer units that are in compliance with the ATCM).

To model non-compliance in some units the inventory uses the trend over the past two years for units that did not comply with turnover, retrofits, or alternative technology. For units facing their age 7 compliance date, the report shows that 31 percent take a specific action beyond natural turnover, over the past two years. It should be noted that this does not mean the compliance rate is 31 percent, as the overall compliance rate is (as described previously) 89 percent.

To determine the compliance parameters, TRUs with engine model years 2009 and 2010 were assessed directly from ARBER reporting data in 2016 and 2010 (the compliance year for those units). Of the 2,739 TRUs facing requirements, 885 (31 percent) either replaced the unit, or installed a level 3 (ULETRU) retrofit, while 1,854 took no action. For TRUs with under 23 horsepower, 270 faced compliance requirements, and 52 took some action, while 218 took no action (19 percent took action). Note that the numbers of TRUs facing compliance requirements does not include Tier 4 Final engines, those already retrofit or with alternative technology already installed, or those turned over in the normal course of business. These TRUs make up the bulk of all units, which is why the overall compliance rate is much higher, at 89 percent.

**Table 12: Compliance Action Average in 2016 and 2017**

	<b>23 Horsepower and Above (Trailers, Rail, Gensets)</b>	<b>Below 23 Horsepower (Trucks)</b>
Replace TRU	313	35
Install ULETRU Retrofit	572	14

	<b>23 Horsepower and Above (Trailers, Rail, Gensets)</b>	<b>Below 23 Horsepower (Trucks)</b>
Install Alternative Technology	0	3
No Action Taken (out of compliance)	1,854	218

In each forecasted year, the units taking action to comply with the ATCM are modeled based on the TRU data between 2011 and 2018. The compliance paths are also split between under 23 horsepower units (all trucks) and over 23 horsepower units (trailers, rail, and gensets). For over 23 horsepower units, almost 80 percent of the units taking action install a level 3 retrofit, while 20 percent replace the unit. For under 23 horsepower units, only 50 percent install retrofits while 30 use alternative technology provisions, and 22 percent replace the unit. The numbers have been updated from the 2011 TRU inventory, and the results from both are shown below in



Table 13.

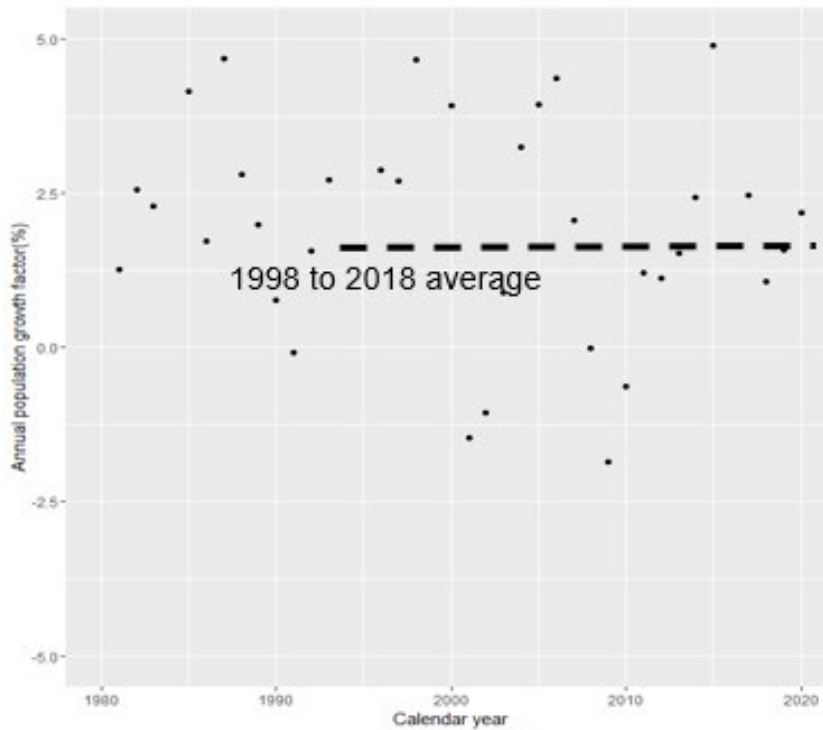
**Table 13: Compliance Choices in 2011 and 2018 TRU Inventory**

	<b>Compliance Action</b>	<b>2011 TRU Inventory</b>	<b>2018 TRU Inventory</b>
Compliance Rate for Age 7 TRUs	----	100%	31%
Over 23 Hp TRUs Compliance Choices (Trailers)	Install level 3 retrofit	65%	78%
Over 23 Hp TRUs Compliance Choices (Trailers)	Alt tech	0%	3%
Over 23 Hp TRUs Compliance Choices (Trailers)	Replace unit	35%	19%
Under 23 Hp TRUs Compliance Choices (Trucks)	Install level 3 retrofit	42%	48%
Under 23 Hp TRUs Compliance Choices (Trucks)	Alt tech	9%	30%
Under 23 Hp TRUs Compliance Choices (Trucks)	Replace unit	49%	22%

**4.5. TRU Industry and Section Growth**

The annual population growth rate is determined primarily by the ACT research's reefer population trend. As the model is focusing on mid to long-term projection (not just the next year's estimate), regression is conducted for the dataset of the past 20 years population trend from ACT research's reefer population data. Figure 14 below shows annual population growth rate of nationwide reefers, with 1998 to 2018 averaging out to 1.6 percent annual growth.

**Figure 14: ACT Research National Reefer Population Growth**



IBIS World Reports for 2017, shown in Table 14 below, shows that industry trends for sectors using refrigerated units such as frozen food production and overall supermarket and grocery stores in the US are growing at 1.6 percent annually as well, supporting this growth rate.

**Table 14: IBIS World Reports Growth by NAICS**

Sector	Category	Average Annual Growth 2011 to 2016
Manufacturing	Frozen food production in the US (NAICS 31141)	1.6%
Retail	Supermarkets & Grocery Stores in the US(44511)	1.6%

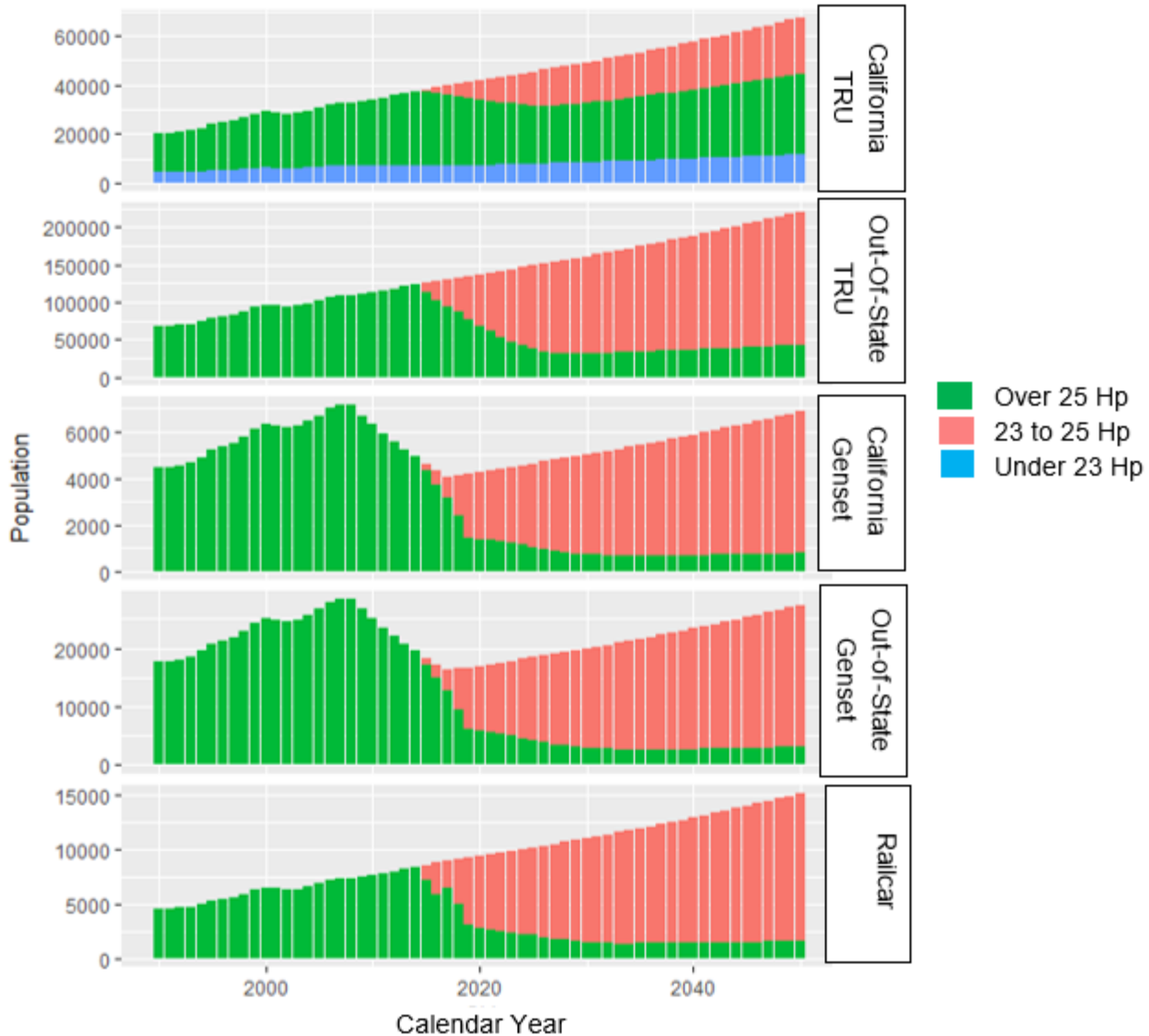
Note that this growth rate is applied only to the 2018 and future years. From 2011 to 2018, the average annual change in TRUs reported in ARBER is used as the growth rate.

**4.6. Composite Population Forecast**

The combination of turnover, purchasing and growth results in the composite forecast (and backcast) shown below in Figure 15. The 23 to 25 horsepower category, that is now a significant portion of new sales, grows as a proportion of the population until about 2025

where they reach an equilibrium (their percent of the population is equal to their percent of new sales from Table 11).

**Figure 15: Composite TRU Population Forecast and Backcast**



The drop in genset populations from 2011 to 2018, and then subsequent growth, is due to the reduction in genset reports, and then the subsequent application of the overall 1.6 growth rate. Discussion with industry suggest that the 2011 to 2018 trend was more like the product of shifting strategies in registration and reporting than a longterm shift away from using gensets in California. However, gensets clearly represent an area where more information and understanding of long term trends is needed in future inventories.

## 5. TRU Regulation Concept

CARB staff is developing the Concept to further reduce emissions from TRUs and TRU gensets. Staff presented the Concept for comment and discussion at public workshops in August and September 2019. The 2019 TRU inventory includes the emissions impacts of the version of the Concept presented at the workshops. The Initial Statement of Reasons (ISOR) will contain the official staff proposal for consideration by the Board. The ISOR will be released 45 days prior to the Board hearing and will include updated analyses of health benefits, emissions, and environmental and economic impacts based on the formal regulatory proposal.

The Concept goes beyond the existing TRU ATCM by transitioning to zero-emission everywhere feasible, and near zero everywhere else; as well as increasing the earlier penetration of infrastructure that will be needed for those technologies. It is designed to reduce criteria pollutants, toxic air contaminants, GHG emissions, as well as community and regional air pollution.

The Concept includes the following requirements:

1. Starting in 2025, all truck TRU fleets must turnover at least 15 percent each year (for 7 years) to full zero-emission technology. All truck TRUs must be full zero-emission by 2031.
  - a. This is modeled by a linear reduction in the activity, fuel, and emissions from these TRUs beginning in 2025 and ending with a 100 percent reduction by 2031. This equates to a 15 percent reduction in every year from 2025 to 2031.
2. Starting in 2025, all trailer TRUs, domestic shipping container TRUs, and TRU gensets must use zero-emission operation if parked or stationary for more than 15 minutes at an applicable facility.
  - a. The current modeling assumption is that this measure will reduce diesel engine run time, fuel use, and emissions by 40 percent. This is based on a stationary run time equal to 49 percent of overall TRU activity, and adding additional time allowance for the first 15 minutes, and stationary time while not at a facility subject to the control measure (unloading at a smaller facility without loading docks).
3. Starting in 2025, all diesel engines in trailer TRUs, domestic shipping container TRUs, railcar TRUs, and TRU gensets that operate in California, regardless of horsepower, must meet the U.S. EPA Tier 4 final emission standard for 25-50 hp engines.
  - a. Currently modeled by setting all emission factors for 23 to 25 horsepower engines to match the over 25 horsepower TRU engines. This reduces PM emissions from these engines by 90 percent, and NOx emissions by 71 percent.

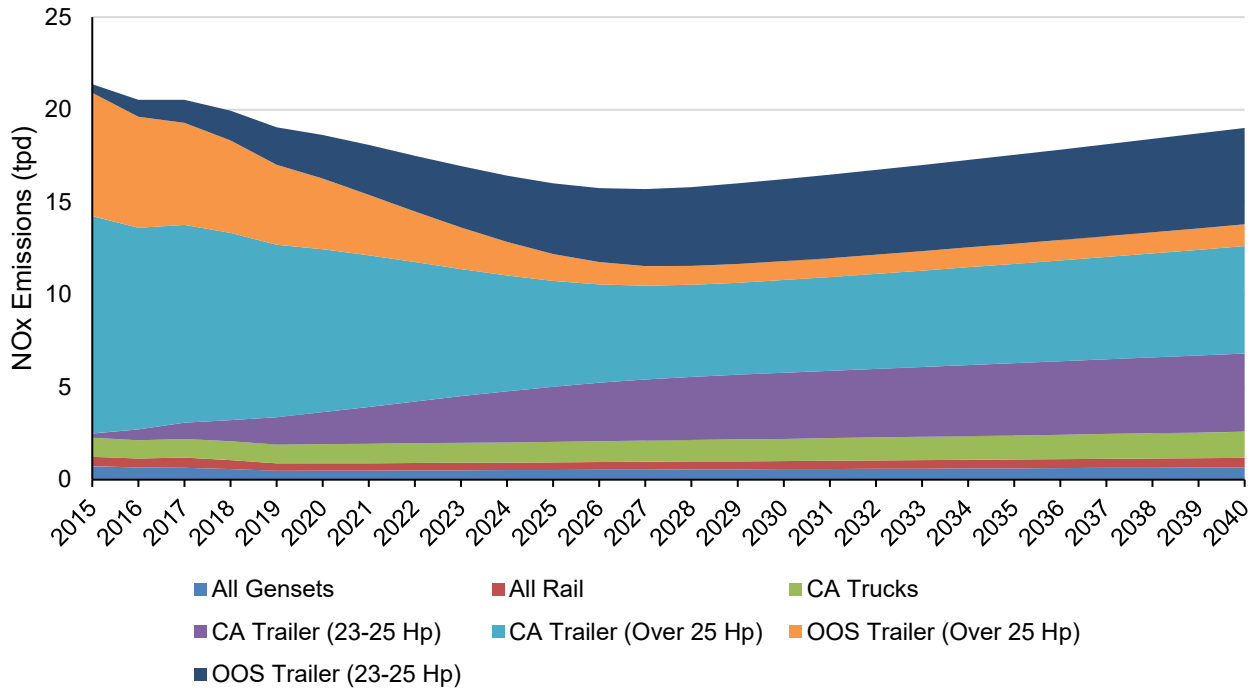
## 6. Emissions Results

The emissions results shown in Figures 16 through 19 reflect all previously described inputs, trends, and modeling. Under the existing TRU ATCM, without further controls, NO<sub>x</sub> will continue to decrease slightly until 2026, when almost all units will be Tier 4. At this point, growth will begin to push NO<sub>x</sub> gradually higher. By 2040, NO<sub>x</sub> will be only about 20 percent lower than 2010.

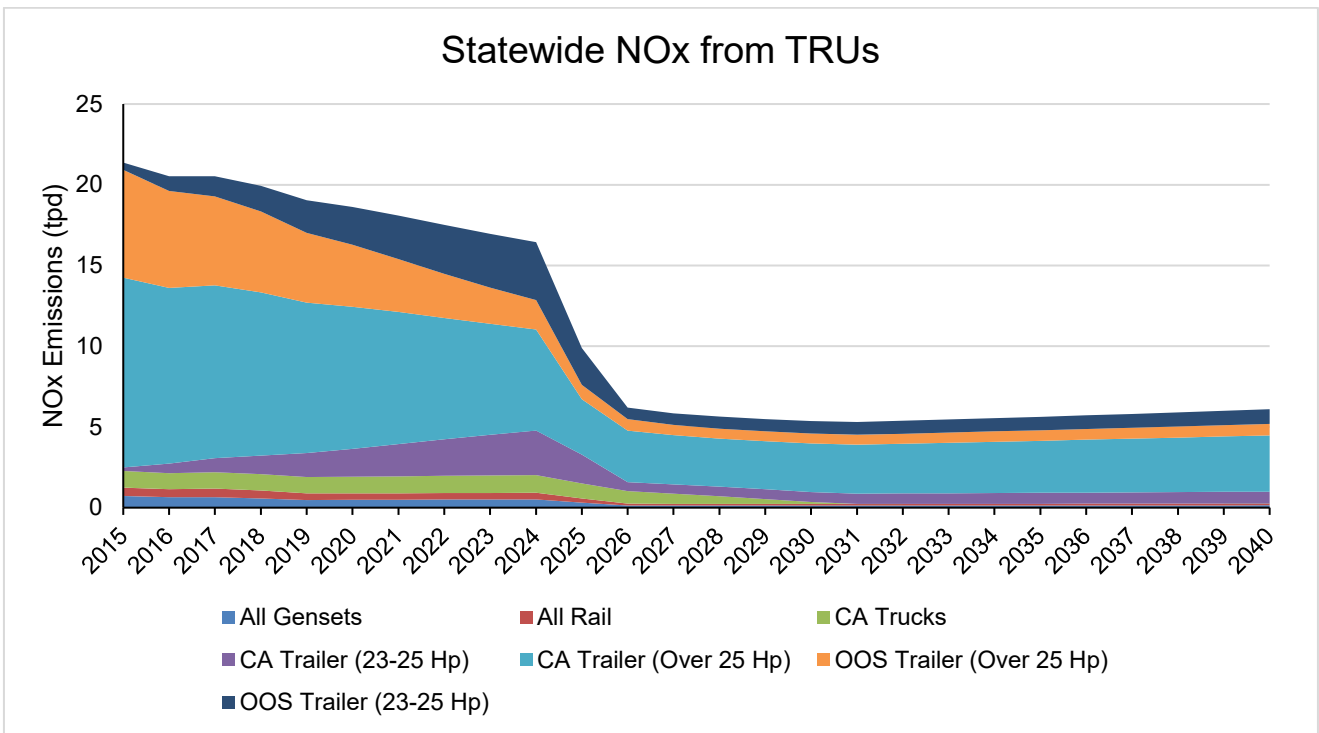
For PM<sub>2.5</sub>, engine emissions controls for TRUs have a larger impact achieving their maximum reduction by 2027, at which point growth begins to gradually increase emissions.

Under the Concept, in 2025 NO<sub>x</sub> is reduced by 50 percent, and PM is reduced by almost 70 percent. This reduction is a combination of the three requirements mentioned in the previous chapter. It should be noted that if manufacturers react to the requirements for 23 to 25 horsepower TRUs, domestic shipping container TRUs, and TRU generator sets (i.e., requirements that they meet the above 25 horsepower emission standards in 2025), benefits would be seen earlier than 2025. If the 23 to 25 horsepower trailer sales are discontinued, at least for TRUs that visit California, the emissions reductions would be achieved earlier than 2025. This is a possible impact occurring now, and should be monitored in future emissions inventories for TRUs.

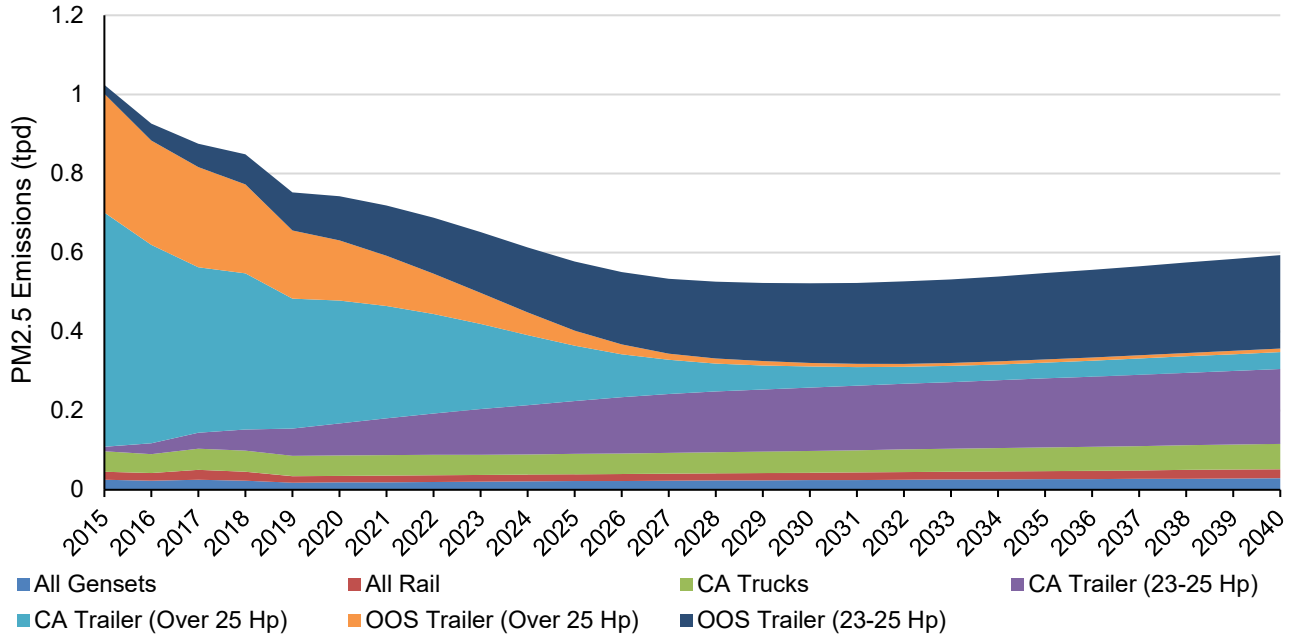
**Figure 16: 2010 to 2040 Statewide NOx by TRU Category Under Existing ATCM**



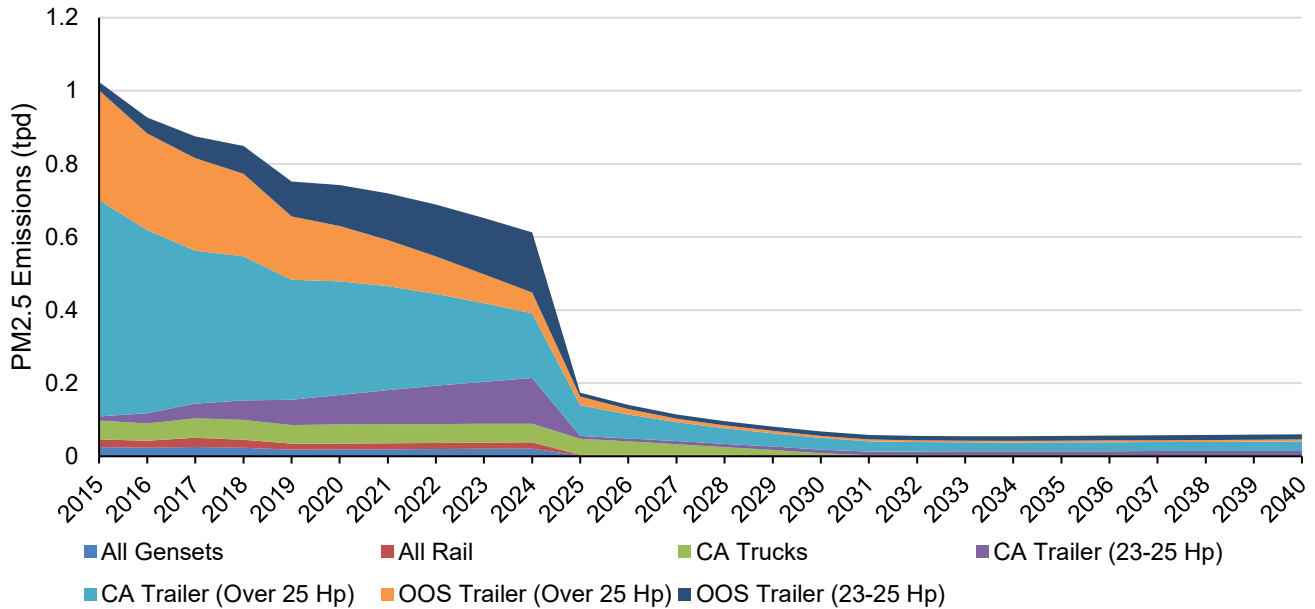
**Figure 17: 2010 to 2040 Statewide NOx by TRU Category Under the Concept**



**Figure 18: 2000 to 2050 Statewide PM2.5 by TRU Category Under Existing ATCM**



**Figure 19: 2010 to 2040 Statewide PM2.5 by TRU Category Under the Concept**





## 7. Appendix A: Emissions Tables

The following tables show the numerical values of the charts shown in the previous section.

**Table 15: Statewide NOx Emissions Under Existing ATCM (tpd)**

<b>Year</b>	<b>All Gensets</b>	<b>All Rail</b>	<b>CA Trucks</b>	<b>CA Trailer (23-25 Hp)</b>	<b>CA Trailer (Over 25 Hp)</b>	<b>OOS Trailer (Over 25 Hp)</b>	<b>OOS Trailer (23-25 Hp)</b>
2015	0.72	0.52	1.03	0.23	11.75	6.67	0.45
2016	0.66	0.49	0.99	0.59	10.90	6.00	0.91
2017	0.65	0.55	1.00	0.88	10.70	5.51	1.25
2018	0.58	0.49	1.01	1.15	10.11	5.00	1.60
2019	0.48	0.40	1.02	1.48	9.32	4.33	2.02
2020	0.49	0.40	1.04	1.73	8.80	3.84	2.34
2021	0.50	0.40	1.05	1.99	8.19	3.27	2.69
2022	0.50	0.40	1.07	2.26	7.53	2.74	3.02
2023	0.51	0.40	1.08	2.52	6.88	2.25	3.32
2024	0.52	0.41	1.09	2.76	6.25	1.82	3.59
2025	0.53	0.41	1.11	2.98	5.71	1.47	3.82
2026	0.53	0.42	1.13	3.16	5.31	1.21	4.01
2027	0.54	0.42	1.14	3.31	5.07	1.06	4.16
2028	0.55	0.43	1.16	3.42	4.97	1.03	4.26
2029	0.56	0.44	1.18	3.50	4.97	1.02	4.35
2030	0.57	0.44	1.20	3.57	5.01	1.02	4.43
2031	0.58	0.45	1.22	3.64	5.06	1.03	4.51
2032	0.59	0.46	1.24	3.71	5.13	1.04	4.58
2033	0.60	0.46	1.26	3.77	5.21	1.06	4.66
2034	0.60	0.47	1.28	3.84	5.29	1.07	4.73
2035	0.61	0.48	1.30	3.90	5.37	1.09	4.81
2036	0.62	0.49	1.32	3.97	5.46	1.10	4.89
2037	0.63	0.49	1.34	4.03	5.54	1.12	4.96
2038	0.64	0.50	1.36	4.10	5.63	1.14	5.04
2039	0.66	0.51	1.38	4.16	5.72	1.16	5.12
2040	0.67	0.52	1.40	4.23	5.81	1.18	5.21

**Table 16: Statewide NOx Emissions Under the Concept (tpd)**

<b>Year</b>	<b>All Gensets</b>	<b>All Rail</b>	<b>CA Trucks</b>	<b>CA Trailer (23-25 Hp)</b>	<b>CA Trailer (Over 25 Hp)</b>	<b>OOS Trailer (Over 25 Hp)</b>	<b>OOS Trailer (23-25 Hp)</b>
<b>2015</b>	0.72	0.52	1.03	0.23	11.75	6.67	0.45
<b>2016</b>	0.66	0.49	0.99	0.59	10.90	6.00	0.91
<b>2017</b>	0.65	0.55	1.00	0.88	10.70	5.51	1.25
<b>2018</b>	0.58	0.49	1.01	1.15	10.11	5.00	1.60
<b>2019</b>	0.48	0.40	1.02	1.48	9.32	4.33	2.02
<b>2020</b>	0.49	0.40	1.04	1.73	8.80	3.84	2.34
<b>2021</b>	0.50	0.40	1.05	1.99	8.19	3.27	2.69
<b>2022</b>	0.50	0.40	1.07	2.26	7.53	2.74	3.02
<b>2023</b>	0.51	0.40	1.08	2.52	6.88	2.25	3.32
<b>2024</b>	0.52	0.41	1.09	2.76	6.25	1.82	3.59
<b>2025</b>	0.32	0.25	0.94	1.79	3.43	0.88	2.29
<b>2026</b>	0.14	0.11	0.79	0.55	3.19	0.72	0.70
<b>2027</b>	0.13	0.11	0.63	0.58	3.04	0.63	0.72
<b>2028</b>	0.13	0.10	0.46	0.59	2.98	0.62	0.74
<b>2029</b>	0.13	0.10	0.29	0.61	2.98	0.61	0.76
<b>2030</b>	0.13	0.10	0.12	0.62	3.01	0.61	0.77
<b>2031</b>	0.13	0.10	-	0.63	3.04	0.62	0.78
<b>2032</b>	0.13	0.10	-	0.65	3.08	0.62	0.80
<b>2033</b>	0.13	0.10	-	0.66	3.12	0.63	0.81
<b>2034</b>	0.13	0.10	-	0.67	3.17	0.64	0.82
<b>2035</b>	0.14	0.11	-	0.68	3.22	0.65	0.84
<b>2036</b>	0.14	0.11	-	0.69	3.27	0.66	0.85
<b>2037</b>	0.14	0.11	-	0.70	3.32	0.67	0.86
<b>2038</b>	0.14	0.11	-	0.71	3.38	0.68	0.88
<b>2039</b>	0.14	0.11	-	0.72	3.43	0.69	0.89
<b>2040</b>	0.14	0.11	-	0.74	3.48	0.71	0.91

**Table 17: Statewide PM2.5 Under Existing ATCM (tpd)**

<b>Year</b>	<b>All Gensets</b>	<b>All Rail</b>	<b>CA Trucks</b>	<b>CA Trailer (23-25 Hp)</b>	<b>CA Trailer (Over 25 Hp)</b>	<b>OOS Trailer (Over 25 Hp)</b>	<b>OOS Trailer (23-25 Hp)</b>
<b>2015</b>	0.02	0.02	0.05	0.01	0.59	0.30	0.02
<b>2016</b>	0.02	0.02	0.05	0.03	0.50	0.26	0.04
<b>2017</b>	0.03	0.03	0.05	0.04	0.42	0.25	0.06
<b>2018</b>	0.02	0.02	0.05	0.05	0.39	0.23	0.08
<b>2019</b>	0.02	0.02	0.05	0.07	0.33	0.17	0.10
<b>2020</b>	0.02	0.02	0.05	0.08	0.31	0.15	0.11
<b>2021</b>	0.02	0.02	0.05	0.09	0.28	0.13	0.13
<b>2022</b>	0.02	0.02	0.05	0.10	0.25	0.10	0.14
<b>2023</b>	0.02	0.02	0.05	0.12	0.22	0.08	0.15
<b>2024</b>	0.02	0.02	0.05	0.12	0.18	0.06	0.16
<b>2025</b>	0.02	0.02	0.05	0.13	0.14	0.04	0.17
<b>2026</b>	0.02	0.02	0.05	0.14	0.11	0.02	0.18
<b>2027</b>	0.02	0.02	0.05	0.15	0.09	0.02	0.19
<b>2028</b>	0.02	0.02	0.05	0.15	0.07	0.01	0.19
<b>2029</b>	0.02	0.02	0.05	0.16	0.06	0.01	0.20
<b>2030</b>	0.02	0.02	0.06	0.16	0.05	0.01	0.20
<b>2031</b>	0.02	0.02	0.06	0.16	0.05	0.01	0.20
<b>2032</b>	0.03	0.02	0.06	0.17	0.04	0.01	0.21
<b>2033</b>	0.03	0.02	0.06	0.17	0.04	0.01	0.21
<b>2034</b>	0.03	0.02	0.06	0.17	0.04	0.01	0.21
<b>2035</b>	0.03	0.02	0.06	0.17	0.04	0.01	0.22
<b>2036</b>	0.03	0.02	0.06	0.18	0.04	0.01	0.22
<b>2037</b>	0.03	0.02	0.06	0.18	0.04	0.01	0.23
<b>2038</b>	0.03	0.02	0.06	0.18	0.04	0.01	0.23
<b>2039</b>	0.03	0.02	0.06	0.19	0.04	0.01	0.23
<b>2040</b>	0.03	0.02	0.06	0.19	0.04	0.01	0.24

**Table 18: Statewide PM2.5 Under the Concept (tpd)**

<b>Year</b>	<b>All Gensets</b>	<b>All Rail</b>	<b>CA Trucks</b>	<b>CA Trailer (23-25 Hp)</b>	<b>CA Trailer (Over 25 Hp)</b>	<b>OOS Trailer (Over 25 Hp)</b>	<b>OOS Trailer (23-25 Hp)</b>
<b>2015</b>	0.02	0.02	0.05	0.01	0.59	0.30	0.02
<b>2016</b>	0.02	0.02	0.05	0.03	0.50	0.26	0.04
<b>2017</b>	0.03	0.03	0.05	0.04	0.42	0.25	0.06
<b>2018</b>	0.02	0.02	0.05	0.05	0.39	0.23	0.08
<b>2019</b>	0.02	0.02	0.05	0.07	0.33	0.17	0.10
<b>2020</b>	0.02	0.02	0.05	0.08	0.31	0.15	0.11
<b>2021</b>	0.02	0.02	0.05	0.09	0.28	0.13	0.13
<b>2022</b>	0.02	0.02	0.05	0.10	0.25	0.10	0.14
<b>2023</b>	0.02	0.02	0.05	0.12	0.22	0.08	0.15
<b>2024</b>	0.02	0.02	0.05	0.12	0.18	0.06	0.16
<b>2025</b>	0.00	0.00	0.04	0.01	0.08	0.02	0.01
<b>2026</b>	0.00	0.00	0.04	0.01	0.07	0.01	0.01
<b>2027</b>	0.00	0.00	0.03	0.01	0.05	0.01	0.01
<b>2028</b>	0.00	0.00	0.02	0.01	0.04	0.01	0.01
<b>2029</b>	0.00	0.00	0.01	0.01	0.04	0.01	0.01
<b>2030</b>	0.00	0.00	0.01	0.01	0.03	0.01	0.01
<b>2031</b>	0.00	0.00	-	0.01	0.03	0.00	0.01
<b>2032</b>	0.00	0.00	-	0.01	0.03	0.00	0.01
<b>2033</b>	0.00	0.00	-	0.01	0.02	0.00	0.01
<b>2034</b>	0.00	0.00	-	0.01	0.02	0.00	0.01
<b>2035</b>	0.00	0.00	-	0.01	0.02	0.00	0.01
<b>2036</b>	0.00	0.00	-	0.01	0.02	0.00	0.01
<b>2037</b>	0.00	0.00	-	0.01	0.02	0.00	0.01
<b>2038</b>	0.00	0.00	-	0.01	0.03	0.00	0.01
<b>2039</b>	0.00	0.00	-	0.01	0.03	0.00	0.01
<b>2040</b>	0.00	0.00	-	0.01	0.03	0.01	0.01