



Transport Refrigeration Unit Enforcement Work Group Meeting

July 29, 2020

Updated Concept for TRU Regulation

- Facility Registration, Fees, and Compliance Plan Reporting
- Expanded TRU Registration Requirements
- TRU Emission Standards
- Stationary Operating Time Limit (SOTL)
- TRU Reporting or Certification Not Allowing Non-Compliant TRUs Onsite

TRU Enforcement Goals

- Achieve compliance
- Reduce health impacts associated with diesel PM, NO_x, and GHG emissions
- Ensure level playing field
- Deter violations

Enforcement Needs

- Mechanisms to easily identify all responsible parties
- Mechanisms to hold all responsible parties accountable for compliance
- Mechanisms to easily identify compliance
- Consequences of non-compliance

TRU Enforcement Mechanisms

- Requirements for all parties involved in TRU activities including SOTL
- Applicable facilities reporting TRUs or turn away
- Labeling and registration

Requirements for All Parties Involved

- TRU Emission Standards
 - TRU Original Equipment Manufacturer (OEM)
 - TRU Owner and Operator
 - Freight Contractor
 - Truck Owner and Driver
- Stationary Operating Time Limit (SOTL)
 - Applicable Facility Owner and Operator
 - TRU Owner and Operator
 - Truck Owner and Driver (for Trailer TRUs and TRU Generator Sets)

Comments: SOTL Joint and Several Liability

- Joint and several liability as proposed in the regulation is problematic
- The regulation should place clear responsibilities on regulated parties under the rule
- The goods movement system does not work in the idealized manner envisioned in the rule

CARB Discussion on SOTL Joint and Several Liability

- TRU operators and facilities should coordinate and work together to ensure that SOTL violations don't happen
- Multiple checks to ensure SOTL not exceeded
- All party liability helps to promote level playing field
- Discussion

Applicable Facility TRU Reporting

- Report all TRUs that operate inside their geofence to CARB quarterly
 - Provide report upon request when inspected by CARB
- Provide declaration that non-compliant TRUs do not operate inside the geofence
 - Quick verification methods: website lookup capability, periodic registration renewal, and label requirements

Comments: Applicable Facility TRU Reporting

- CARB should not rely on the regulated parties to police themselves
- CARB should allow a third facility reporting option that only requires that facilities report non-compliant TRUs
- Additional staff needed at CA facilities to look up, log and report unit info is unfair to CA facilities. Out-of-state facilities don't have to report this info

CARB Discussion on Applicable Facility TRU Reporting

- Promotes level playing field between non-compliant vs. compliant TRUS and in-state vs. out-of-state TRUs
- Facility should share in responsibility of reducing emissions from TRUs operating on its property
- Reporting all TRUs ensures accurate and comprehensive data received from facilities
- Alternative to reporting is to not allow non-compliant units to operate at facility
- Discussion

Expanded TRU Registration and Labeling

- All TRUs operating in CA must register, pay fees and affix the CARB-issued label
- Re-register TRU every 2 years and receive a new label
- Non-compliant units will not be allowed to register or re-register unless compliance is demonstrated

Comments: Expanded Registration and Labeling

- Registration renewal should be lengthened or eliminated
- CARB-supplied label vs. CARB identification number timing issues

CARB Discussion on Expanded Registration and Labeling

- Ensure level playing field
- Quick compliance verification
- Timely correction of non-compliant TRUs and outstanding violations
- 30 days to affix label
- Standardized label reduces counterfeiting
- Discussion

Thank You for Attending

- Enforcement Questions:
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