TRU Advisory: 08-10

# Affixing or Painting ARB Identification Numbers on TRUs

The purpose of this advisory is to explain the requirements for affixing or painting ARB Identification Numbers (IDN) on a transport refrigeration unit (TRU) housing.

## **Background**

Title 13, California Code of Regulations (CCR), section 2477 (TRU Airborne Toxic Control Measure, or TRU ATCM) requires owners/operators<sup>1</sup> of California-based TRUs and TRU generator sets to apply for IDNs for each California-based TRU or TRU generator set. ARB is required to issue IDNs to the owner/operator if the IDN application is complete.

## How do I affix or paint the ARB IDN to the TRU or TRU generator set housing?

Within 30 days of receipt of the ARB-issued IDN, the TRU ATCM requires the owner/operator to permanently affix or paint the ARB IDN on the TRU or TRU generator set chassis housing in clear view (see title 13 CCR section (e)(1)(E)1.f). The ARB IDN (nine numeric digits) must be preceded by the letters "ARB" and the numbers and letters must contrast sharply in color with the color of the background surface. Letters and numbers must be readily legible during daylight hours from a distance of 50 feet while the unit is stationary. The ARB IDN must be located as follows:

- Truck and Trailer TRUs: IDN on both sides of the TRU chassis housing
- Rail cars: IDN on both sides of the TRU housing or reporting marks on both sides of the rail car (see Advisory 08-03)
- Domestic shipping containers: IDN on both sides of the TRU housing or BIC Code on both sides of the shipping container (see <u>Advisory 08-03</u>)
- TRU generator sets: IDN or BIC Code on both sides of the TRU generator set housing (see Advisory 08-03)

Horizontal orientation of the IDN on the TRU housing is preferred. Units with space issues may choose to split up the "ARB" (put on top line) from the actual IDN (put on the 2<sup>nd</sup> line just below "ARB"). On some models of trailer TRUs, you may orient the IDN vertically, starting at the top with "A", then "R below that", then "B" below that, then each digit of the IDN proceeding from top to bottom. Orient all characters vertically. Do not orient characters sideways (making the reader look sideways is not acceptable).

### How big should the letters and numbers be?

We have found that letters and numbers generally need to be at least two inches high with at least onequarter inch thick outlines. The regulation requires the IDN to be legible during daylight hours from 50 feet while the unit is stationary.

<sup>&</sup>lt;sup>1</sup> "Owner/Operator" means a requirement applies to the owner and/or operator of a TRU or TRU gen set, as determined by agreement or contract between the parties if the two are separate business entities.

#### **For More Information**

To obtain a copy of the regulation or other related compliance assistance documents, visit the TRU website at <a href="http://www.arb.ca.gov/diesel/tru/tru.htm">http://www.arb.ca.gov/diesel/tru/tru.htm</a>. Additional questions may be addressed by calling the toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM).

If you require special accommodation or language needs, please call 1-888-878-2826 or email tru@arb.ca.gov. TTY/TDD/Speech users may dial 711 for a California Relay Service.

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