



# Regulatory Advisory

Last Update January 2011



## TRU Advisory: 10-20

### 2010 Amendments to the TRU ATCM

The purpose of this advisory is to explain what owners of model year (MY) 2003 transport refrigeration unit and generator set engines (collectively referred to as TRUs) need to do as a result of the 2010 Amendments to the TRU Airborne Toxic Control Measure (ATCM)<sup>1</sup>.

#### Background

The California Air Resources Board (ARB) adopted amendments to the TRU ATCM on November 18, 2010. The amendments to the TRU ATCM included changes that affect MY 2003 engines:

1. All MY 2003 engines will now be allowed to meet either the Ultra-Low-Emission TRU (ULETRU) in-use standard or the less stringent and less costly Low-Emission TRU (LETRU) in-use standard.
2. All owners of TRUs equipped with flexibility engines that have been installed by TRU manufacturers (OEM) prior to January 2011 will be able to use the engine's manufacture year as the basis for determining the MY compliance deadline and in-use requirements. TRU units using flexibility engines that are installed after January 1, 2011 will have a shorter operational life, because in-use compliance deadlines will be based on the effective model year, as defined in the amendments, not the engine manufacture year.

#### What Should Owners of Model Year 2003 TRU Engines Do to Comply?

Owners of TRUs and TRU generator sets equipped with model year 2003 engines should make compliance decisions **now** and order compliance technology **as soon as possible** so that compliance with either the ULETRU or LETRU in-use performance standard is achieved by March 31, 2011. Orders should be placed early, taking into consideration the delivery and installation lead times, which can be three months or more.

#### What Should Owners of TRU Units Equipped with Flexibility Engines Do to Comply?

Owners of TRUs equipped with flexibility engines that were manufactured in 2005, but meet the 2003 emissions standards (i.e., Tier 1 engines), will not need to comply with the in-use standards by December 31, 2010. Instead, compliance will be required by December 31, 2012, seven years after the engine manufacture year. Owners of TRUs that are equipped with flexibility engines need to be registered in ARB's Equipment Registration (ARB-ER) system so that compliance dates for these engines can be adjusted. TRU OEMs are providing flexibility engine manufacture dates to ARB. ARB will adjust the "Compliant Until" dates in ARBER. Updated registration certification pages will be mailed to the owners of ARBER-registered TRUs equipped with flexibility engines by the end of the year.

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<sup>1</sup> The TRU ATCM 2010 Amendments are available in Appendix A of the Staff Report: Initial Statement of Reasons at: <http://www.arb.ca.gov/regact/2010/tru2010/tru2010.htm>

## How can I tell if my TRU is equipped with a flexibility engine?

Owners may determine whether their TRU or TRU generator set is equipped with a flexibility engine by examining the engine's emissions control label. Flexibility engines have special labels that include language the same as, or similar to the following:

“THIS NONROAD ENGINE IS EXEMPT FROM COMPLIANCE WITH CURRENT MODEL YEAR EMISSIONS STANDARDS UNDER THE PROVISION OF THE US EPA TRANSITIONAL PROGRAM FOR EQUIPMENT MANUFACTURER SET FORTH IN 40 CFR 89.102”

As an example, Figure 1 shows a picture of a flexibility engine label.



Figure-1 Yanmar 2005 Manufactured Engine Labeled as 2003 TPME

Please contact your TRU or TRU generator set dealer or manufacturer for assistance if actual engine labels are not clear.

### For more information

To obtain a copy of the regulation or other related compliance assistance documents, visit the TRU website at <http://www.arb.ca.gov/diesel/tru/tru.htm>. Additional questions may be addressed by calling the toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM). If you need this document in an alternative format or another language, please call 1-888-878-2826 or email [tru@arb.ca.gov](mailto:tru@arb.ca.gov). TTY/TDD/Speech users may dial 711 for a California Relay Service.