

**Comment 1 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Mark

Last Name: Spohr

Email Address: mhspohr@gmail.com

Affiliation:

Subject: Option for solar battery electric units

Comment:

I urge you to allow an option to replace diesel units with solar battery electric units. These are becoming available commercially and are much cleaner than any diesel or gas powered units.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-17 06:34:45

No Duplicates.

## **Comment 2 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Bill  
Last Name: Magavern  
Email Address: bill@ccair.org  
Affiliation: Coalition for Clean Air

Subject: Support for TRU amendments  
Comment:

September 2, 2021

California Air Resources Board  
1001 I Street.  
Sacramento, CA 95814

Re: Transport Refrigeration Units Rulemaking -- Support  
Dear Board Members:

Coalition for Clean Air supports the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate that are on the agenda for your September 23 Board Hearing. These strengthening amendments to the current rule are important to reduce diesel particulate matter (PM) emissions and resulting health risk from diesel-powered TRUs.

The 2010 and 2011 amendments have not reduced emissions as much as expected, in large part because of growing sales of units with less than 25 horsepower engines. The proposed amendments would close that loophole and establish a transition to zero-emission engines for truck TRUs. This transition will reduce cancer risk to individual residents and off-site workers near facilities where TRUs operate, including those located in and near disadvantaged communities; improve air quality; provide GHG emission reductions (including the powerful short-lived climate pollutants hydrofluorocarbons and black carbon) needed to combat climate change; and reduce non-cancer health impacts such as premature deaths, hospital visits for cardiovascular and respiratory illnesses, and emergency room visits for asthma, especially in sensitive receptors including children, the elderly, and people with chronic heart or lung disease.

Because of these benefits, we urge the Board to vote for the amendments today and bring them back for final adoption as soon as possible. In addition, we urge you to quickly take the next step, which is to also move all trailer and other TRUs to zero-emission operation.

Respectfully,

Bill Magavern  
Policy Director

Attachment: [www.arb.ca.gov/lists/com-attach/2-tru2021-USUFcQRwAjIDblQL.docx](http://www.arb.ca.gov/lists/com-attach/2-tru2021-USUFcQRwAjIDblQL.docx)

Original File Name: Truck TRU comments to ARB 9.2.21.docx

Date and Time Comment Was Submitted: 2021-09-02 15:40:19

No Duplicates.

**Comment 3 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Tom  
Last Name: Keller  
Email Address: tom.keller@cleancoldpower.com  
Affiliation:

Subject: CCP Comments on TRU Amendments  
Comment:

Comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/3-tru2021-AmFTNlcmBAgBZFI9.pdf](http://www.arb.ca.gov/lists/com-attach/3-tru2021-AmFTNlcmBAgBZFI9.pdf)

Original File Name: CCP Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-09-13 09:05:17

No Duplicates.

**Comment 4 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Chris  
Last Name: Bowman  
Email Address: cbowman@omm.com  
Affiliation:

Subject: XTRA Lease Comments to Proposed TRU Regulation  
Comment:

Good morning,

Enclosed please find XTRA Lease's comments to the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate. These comments will also be submitted via email to the Clerk of the Board.

Regards,  
Chris Bowman

Attachment: [www.arb.ca.gov/lists/com-attach/4-tru2021-VjVSNVIhBTRRCFcl.pdf](http://www.arb.ca.gov/lists/com-attach/4-tru2021-VjVSNVIhBTRRCFcl.pdf)

Original File Name: CARB Response (September 2021).pdf

Date and Time Comment Was Submitted: 2021-09-13 09:05:01

No Duplicates.

**Comment 5 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Theresa

Last Name: Romanosky

Email Address: tromanosky@aar.org

Affiliation: Association of American Railroads

Subject: AAR, BNSF, and UP Comments on CARB TRU Rule

Comment:

Attached please find comments on CARB's Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate, submitted by the Association of American Railroads, BNSF Railway, and Union Pacific Railroad Company.

Attachment: [www.arb.ca.gov/lists/com-attach/5-tru2021-ATFWaVJiUTELPwAw.pdf](http://www.arb.ca.gov/lists/com-attach/5-tru2021-ATFWaVJiUTELPwAw.pdf)

Original File Name: 09132021 - AAR-BNSF-UP Comment on Proposed Amendments to CARB TRU Rule.pdf

Date and Time Comment Was Submitted: 2021-09-13 13:17:39

No Duplicates.

**Comment 6 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Nick

Last Name: Chiappe

Email Address: [nchiappe@caltrux.org](mailto:nchiappe@caltrux.org)

Affiliation:

Subject: CTA and ATA Comments on Proposed Amendments to the TRU Rule

Comment:

Attached are the California Trucking Association and American Trucking Associations' comments on the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.

Attachment: [www.arb.ca.gov/lists/com-attach/6-tru2021-ViJTJ1YiU19QNQlm.pdf](http://www.arb.ca.gov/lists/com-attach/6-tru2021-ViJTJ1YiU19QNQlm.pdf)

Original File Name: TRU Comments 09132021.pdf

Date and Time Comment Was Submitted: 2021-09-13 16:00:52

No Duplicates.

**Comment 7 for Transport Refrigeration Units ATCM Regulation (tru2021) - 45 Day.**

First Name: Yasmine  
Last Name: Agelidis  
Email Address: yagelidis@earthjustice.org  
Affiliation: Earthjustice

Subject: Support for Cleaning Transportation Refrigeration Units  
Comment:

Please find attached a comment letter in support of CARB's proposed Transportation Refrigeration Unit rule, submitted on behalf of health, community, environmental and labor organizations.

Attachment: [www.arb.ca.gov/lists/com-attach/7-tru2021-Wi5cKAB0AAwDZghn.pdf](http://www.arb.ca.gov/lists/com-attach/7-tru2021-Wi5cKAB0AAwDZghn.pdf)

Original File Name: TRU Comment Letter 9-13-2021 Final.pdf

Date and Time Comment Was Submitted: 2021-09-13 19:42:05

No Duplicates.



**Comment 1 for Transport Refrigeration Units ATCM Regulation (tru2021).  
(At Hearing)**

First Name: Michael  
Last Name: Murphy  
Email Address: mmurphy@baaqmd.gov  
Affiliation: Bay Area AQMD

Subject: Support for the proposed amendments to the In-Use TRU control measure  
Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8-tru2021-VTxcNFV5ACYAdQZj.pdf](http://www.arb.ca.gov/lists/com-attach/8-tru2021-VTxcNFV5ACYAdQZj.pdf)

Original File Name: In-Use TRU Admendments\_BAAQMD\_Final\_JB.pdf

Date and Time Comment Was Submitted: 2021-09-23 08:31:30

No Duplicates.

**Comment 2 for Transport Refrigeration Units ATCM Regulation (tru2021).  
(At Hearing)**

First Name: Yasmine  
Last Name: Agelidis  
Email Address: yagelidis@earthjustice.org  
Affiliation: Earthjustice

Subject: Support for Cleaning Transportation Refrigeration Units  
Comment:

On behalf of health, community, environmental, and labor organizations, we respectfully submit this comment letter in support of the California Air Resources Board's proposed Transportation Refrigeration Unit rule.

Attachment: [www.arb.ca.gov/lists/com-attach/9-tru2021-VCBTJ1QgVVkAZQhn.pdf](http://www.arb.ca.gov/lists/com-attach/9-tru2021-VCBTJ1QgVVkAZQhn.pdf)

Original File Name: TRU Comment Letter 9-23-2021 Final.pdf

Date and Time Comment Was Submitted: 2021-09-23 09:01:33

No Duplicates.

**Comment 3 for Transport Refrigeration Units ATCM Regulation (tru2021).  
(At Hearing)**

First Name: Colin  
Last Name: Miller  
Email Address: colin@ej.solutions  
Affiliation: Environmental / Justice Solutions

Subject: PSR-LA Sign-on Letter to CARB Opposing CCUS in Scoping Plan 9/23/2021  
Comment:

Good morning,

On behalf of Physicians for Social Responsibility - Los Angeles (PSR-LA) and the undersigned organizations and individuals, please find attached a comment letter addressed to Chair Randolph and CARB Board Members, for this morning's Board meeting.

Please let us know that you have distributed our letter with CARB Board members, and if you need anything else.

Thank you very much.

In community,  
Colin, on behalf of PSR-LA  
-  
Colin Miller, Senior Associate  
Environmental / Justice Solutions

Attachment: [www.arb.ca.gov/lists/com-attach/10-tru2021-UTdWOV0yUGJWPAVa.pdf](http://www.arb.ca.gov/lists/com-attach/10-tru2021-UTdWOV0yUGJWPAVa.pdf)

Original File Name: FINAL PSR-LA and Allies CCUS CARB Comment Letter 9\_23\_2021.pdf

Date and Time Comment Was Submitted: 2021-09-23 09:43:16

No Duplicates.

**Comment 4 for Transport Refrigeration Units ATCM Regulation (tru2021).  
(At Hearing)**

First Name: Yasmine  
Last Name: Agelidis  
Email Address: yagelidis@earthjustice.org  
Affiliation: Earthjustice

Subject: Agenda Item No. 21-9-5: Support for Strong Transportation Refrigeration Unit Rule  
Comment:

Dear Clerk of the Board,

I would like to submit the attached letters to the public docket for Agenda Item No. 21-9-5: Public Hearing to Consider Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.

Attachment: [www.arb.ca.gov/lists/com-attach/11-tru2021-VTZdOIYIUmNRCARw.pdf](http://www.arb.ca.gov/lists/com-attach/11-tru2021-VTZdOIYIUmNRCARw.pdf)

Original File Name: CARB TRU Action Alert Messages.pdf

Date and Time Comment Was Submitted: 2021-09-23 09:48:31

No Duplicates.

## **Comment 5 for Transport Refrigeration Units ATCM Regulation (tru2021). (At Hearing)**

First Name: Juliana

Last Name: Rodriguez

Email Address: juliana.rodriguez@gladstein.org

Affiliation: GNA

Subject: Delegation of owner requirements to lessees when applicable

Comment:

We ask for edits to section 2477.12. Requirements for Lessors and Lessees to delegate owner requirements to lessees when applicable.

We ask for consistency across CARB rules with definitions that affect businesses that are regularly engaged in the trade or business of renting or leasing motor vehicles without drivers. The following statements from the Advanced Clean Fleet rule should be implemented in the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate

The ACF rules stipulates the following:

B) For vehicles that are rented or leased from a business that is regularly engaged in the trade or business of renting or leasing motor vehicles without drivers, The owner shall be presumed to be the rental or leasing entity for purposes of compliance if:

- a. The rental or lease agreement for the vehicle is for a period of less than one year; or
- b. The rental or lease agreement for the vehicle is for a period of one year or longer, unless the terms of the rental or lease agreement or other equally reliable evidence identifies the party responsible for compliance with state laws for the vehicle to be the renting operator or lessee of the vehicle.

Why this matters?

There are immense challenges on the control of leased and rented vehicles outside of CA. If a vehicle that generally doesn't operate in CA but has one or two trips would be affected. Penske would have to change all the contracts to stipulate that entry in CA is prohibited, but that might still not stop entrance. If there was consistency across rules and the terms of the rental or lease agreement or other equally reliable evidence identifies the party responsible for compliance with state laws for the vehicle to be the renting operator or lessee of the vehicle it would be beneficial to all and encourage compliance.

Regulations that are not based on vehicle registration are much harder to implement and for this reason we ask for CARB to think how they can support fleets that have these challenges.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-23 12:48:16

No Duplicates.

**Comment 6 for Transport Refrigeration Units ATCM Regulation (tru2021).  
(At Hearing)**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchandl@suddenlink.net  
Affiliation:

Subject: Comment from Daniel Chandler  
Comment:

Please see attached comment received via cotb@arb.ca.gov

Attachment: [www.arb.ca.gov/lists/com-attach/13-tru2021-UydXIwdzBQkKb1M8.zip](http://www.arb.ca.gov/lists/com-attach/13-tru2021-UydXIwdzBQkKb1M8.zip)

Original File Name: TRU Comment from Daniel Chandler.zip

Date and Time Comment Was Submitted: 2021-09-29 11:19:21

No Duplicates.

**Comment 1 for Transport Refrigeration Units ATCM Regulation (tru2021) - 15-1.**

First Name: Nick  
Last Name: Chiappe  
Email Address: [nchiappe@caltrux.org](mailto:nchiappe@caltrux.org)  
Affiliation:

Subject: CTA Comments on Proposed Amendments to TRU regulation  
Comment:

Attached are the California Trucking Association's comments on the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.

Attachment: [www.arb.ca.gov/lists/com-attach/16-tru2021-WzhUPlw4VncGawQq.pdf](http://www.arb.ca.gov/lists/com-attach/16-tru2021-WzhUPlw4VncGawQq.pdf)

Original File Name: Clerk. 15-Day Comments on ACTM for TRUs (01362156).pdf

Date and Time Comment Was Submitted: 2022-01-06 13:07:10

No Duplicates.



**Comment 2 for Transport Refrigeration Units ATCM Regulation (tru2021) - 15-1.**

First Name: Chris  
Last Name: Bowman  
Email Address: cbowman@omm.com  
Affiliation:

Subject: XTRA Lease Comments to Proposed TRU Regulation  
Comment:

Good afternoon,

Enclosed please find XTRA Lease's comments to the Proposed 15-Day Changes to the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate. These comments will also be submitted via email to the Clerk of the Board.

Regards,  
Chris Bowman

Attachment: [www.arb.ca.gov/lists/com-attach/17-tru2021-UjFVMIMgWWhWD1Un.pdf](http://www.arb.ca.gov/lists/com-attach/17-tru2021-UjFVMIMgWWhWD1Un.pdf)

Original File Name: CARB Response (January 2022).pdf

Date and Time Comment Was Submitted: 2022-01-06 13:13:44

No Duplicates.

**Comment 3 for Transport Refrigeration Units ATCM Regulation (tru2021) - 15-1.**

First Name: Josh  
Last Name: Grodin  
Email Address: josh.grodin@penske.com  
Affiliation:

Subject: Penske - Comments on the Proposed Amendments to the TRU Proposed Rulemaking  
Comment:

Please find the attached comment letter from Penske Truck Leasing (Penske) re: the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.

Attachment: [www.arb.ca.gov/lists/com-attach/18-tru2021-UiIBYl0yAiIAbQht.pdf](http://www.arb.ca.gov/lists/com-attach/18-tru2021-UiIBYl0yAiIAbQht.pdf)

Original File Name: Penske TRU Comment Letter\_1.6.22.pdf

Date and Time Comment Was Submitted: 2022-01-06 14:12:51

No Duplicates.