

**Comment 1 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Steve

Last Name: Ritchie

Email Address: steve.ritchie@irco.com

Affiliation:

Subject: Enforcement

Comment:

What is being done to improve enforcement? Many fleets avoid the increased equipment costs because they don't think they will be caught.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-19 09:36:15

No Duplicates.

**Comment 2 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Michael

Last Name: Cornett

Email Address: mcornett@tcstk.com

Affiliation: Thermo king

Subject: Electric Charge Guidance

Comment:

Is CARB going to limit facilities on what they can charge for TRUs plugged into their facilities. Generally, length of stay of the TRU is up to the facility not the Trucking company.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-19 11:02:52

No Duplicates.

Comment 3 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Alfonso

Last Name: Arambula

Email Address: alfonso.arambula@arb.ca.gov

Affiliation: CARB Enforcement

Subject: 2478.3 Stationary Operating Time Limit (SOTL)

Comment:

I suggest specifying that a Trailer TRU or TRU Gen Set must change location by 10 feet with respect to the applicable facility geofence for the SOTL to restart at zero.

Not specifying the distance that must be traveled to restart the SOTL to 0 may lead to challenges enforcing SOTL violations.

Primarily, SOTL violations may be contested because the rule does not specify a necessary travel distance to restart the clock to zero. A violator may point to the rule as written and state the violation was issued incorrectly because their Trailer TRU changed location with respect to the applicable facility geofence restarting their clock to zero because their Trailer TRU changed location by 8 feet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-23 10:11:51

No Duplicates.

**Comment 4 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Peter

Last Name: Halverson

Email Address: pete@tksiouxfalls.com

Affiliation: Thermo King of Sioux Falls, Inc.

Subject: Enforcement

Comment:

What is being done to enforce the new regulations?

Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-26 12:15:16

No Duplicates.

Comment 5 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Timothy

Last Name: Anderson

Email Address: tanderson@plmfleet.com

Affiliation: PLM FLEET

Subject: Transport Refrigeration Unit Regulation Concept

Comment:

1- TRU IN-USE ULETRU DEADLINE OF 12/31/2023-

This deadline for ALL in-use TRU's to be ULETRU compliant by 12/31/2023 will force an acceleration of all <25HP TRU's starting with MY2017 thru current production to be filtered well ahead of already planned schedules.

This is not as per the planned 7yr schedule already enacted. This will put quite a financial and logistical burden on many companies that purchased 7yr compliant units during those Model years. Financially to purchase the filters and then logically to find service shops with personnel to install within that time frame, meanwhile everyone else is trying to do the same thing.

In my opinion, You should continue the existing schedule to filter after 7 yrs and make it such that all NEW TRU's after 12/31/2021 be ULETRU.

This will bring lower emission units into the state sooner and the companies can keep the current schedules to filter thru 2027 and still meet your 2030 deadline for all units to be compliant with ULETRU.

We already have units on order that have 7yr engines and cannot cancel or change the order at this late date.

2- TRU REGISTRATION-

The proposed TRU registration renewal of 1-2 years is too short. It is my understanding that this new process will require a serial numbered decal to be placed on each asset. This process of a 1 or 2 year renewal plan puts a level of difficulty to locate and install the CARB decal being provided onto the specific vehicle within the time frame required. Only to have to repeat the process again within 12 to 24 months for each and every asset. For small captured fleets this may not be such an issue but larger fleets and leasing companies that do not have daily responsibility to manage asset location, routes or drop yards will find it most difficult to comply and will most likely receive fines more often despite having paid the registration fee.

Suggestion#1- A 1 time registration for life of the asset or up to 7 years. Replacement decal to be installed on TRU within 90 days of registration. Registration Decal to show TRU ARB registration number and date of registration expiration.

Suggestion#2- A 1 time decal with electronic annual renewal that would not require a new decal when renewed. Officer can check registration status electronically from CARB data base using TRU s/n, ARB#, VIN# or TAG#. Companies could then update registration and not have to revisit the asset to replace the decal.

NOTE- if registration decal becomes damaged or missing there must

be an easy to use electronic process to order replacement.

3-TRU OWNER RESPONSIBILITIES for SOTL violations-
For leasing and rental companies that do not provide management of the driver, routes, loads, schedule appointments for pick and deliveries or other daily asset activities. How can the owner be held responsible for the SOTL fines?

4-GPS REQUIREMENTS-

Geo-fencing any facility can easily be accomplished within almost any GPS product on the market today. However not all GPS products can change the ping rate from 15 minutes to 1 minute based on an asset being inside a Geo-fenced area when stationary for more than 15 minutes. I have talked to 2 different GPS companies, neither will honor our current price structure for this level of reporting. Both companies commented that to do this will take considerable programming hours to modify their existing system to be able to perform this level of reporting and this could easily double or triple our monthly fee for data due to the increase in data reporting being required. This will put yet another burden on companies that will just pass the cost on to the consumer.

Tim Anderson
Product Manager, Refrigeration
PLM FLEET, LLC
tanderson@plmfleet.com
903-814-0014

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-26 15:32:18

No Duplicates.

Comment 6 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Vazken

Last Name: Kassakhian

Email Address: Vazken.Kassakhian@sce.com

Affiliation:

Subject: SCE Comments on TRU regulation concept

Comment:

Attached in the PDF are SCE's comments on the proposed TRU regulation concept.

We appreciate the opportunity to comment.

Thank you,

Vazken Kassakhian

Senior Advisor, Air & Climate Policy

Southern California Edison

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-truregulation-ws-BnVdOFM3Ag4EdIUn.pdf>

Original File Name: SCE TRU Comments 20200330.pdf

Date and Time Comment Was Submitted: 2020-03-30 20:02:48

No Duplicates.

Comment 7 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Timothy

Last Name: French

Email Address: tfrench@clpchicago.com

Affiliation: Truck & Engine Manufacturers Association

Subject: EMA's Preliminary Comments on CARB's Proposed Amended TRU Regulations

Comment:

Attached please find EMA's preliminary comments regarding CARB's updated concepts for amending the current TRU regulations, which concepts CARB presented and discussed during the teleconference meeting on March 19, 2020.

Please let me know if you have any questions concerning EMA's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-truregulation-ws-VCQHcwRgBzgGaVQ5.pdf>

Original File Name: Preliminary Comments on CARBs Draft TRU Regulations.pdf

Date and Time Comment Was Submitted: 2020-04-03 10:25:48

No Duplicates.

**Comment 8 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Tom

Last Name: Bower

Email Address: tom.bower@fosterfarms.com

Affiliation: Foster Poultry Farms

Subject: Comments--Transportation Refrigeration Unit Regulation Concept

Comment:

Comments on attached file

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-truregulation-ws-VzRWMQBzVmdVDAh8.docx>

Original File Name: CARB TRU Comments 4-21-20.docx

Date and Time Comment Was Submitted: 2020-04-24 08:37:16

No Duplicates.

Comment 9 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Gareth

Last Name: Smythe

Email Address: gareth.smythe@navy.mil

Affiliation: U.S. Navy

Subject: U.S. Navy Comments on Informal Draft TRU Reg Concept

Comment:

Please see attached the Navy's comments on the informal draft TRU regulatory concept. We sincerely appreciate the opportunity to provide these comments prior to the formal regulatory process and look forward to working with you on this moving forward.

Please direct any questions or follow-up to Gareth Smythe, DoD Governmental Affairs at gareth.smythe@navy.mil or 619-247-4437.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-truregulation-ws-BmhSNQZxU3lXDIIm.pdf>

Original File Name: Navy TRU Rule Comment Matrix_v.20200424.pdf

Date and Time Comment Was Submitted: 2020-04-24 14:50:57

No Duplicates.

**Comment 10 for Transport Refrigeration Unit Regulation Concept
(turegulation-ws) - 1st Workshop.**

First Name: Tracy

Last Name: Fidell

Email Address: tfidell@portoakland.com

Affiliation: Port of Oakland

Subject: Port of Oakland comments on proposed TRU regulation

Comment:

The Port of Oakland respectfully submits the comments included in our attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-turegulation-ws-BnZcNQR3UHdRCANs.pdf>

Original File Name: Port of Oakland TRU comment letter signed 200424.pdf

Date and Time Comment Was Submitted: 2020-04-24 16:55:03

No Duplicates.

**Comment 11 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Kristian
Last Name: Corby
Email Address: kristian@caletc.com
Affiliation: CalETC

Subject: CalETC's Comments re Proposed TRU Regulation

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-truregulation-ws-ADJSZAAzAGMDNQYy.pdf>

Original File Name: 20200427 CalETC Comments on Proposed TRU Regulation Final.pdf

Date and Time Comment Was Submitted: 2020-04-27 10:45:10

No Duplicates.

**Comment 12 for Transport Refrigeration Unit Regulation Concept
(turegulation-ws) - 1st Workshop.**

First Name: Yasmine

Last Name: Agelidis

Email Address: yagelidis@earthjustice.org

Affiliation:

Subject: Comments on the Transportation Refrigeration Unit Regulation Updated Concept

Comment:

Please find attached comments on the Transportation Refrigeration Unit Regulation Updated Concept.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-turegulation-ws-AXVVIVQgWFQFYFQ7.pdf>

Original File Name: TRU Comment Letter_Final.pdf

Date and Time Comment Was Submitted: 2020-04-27 12:02:38

No Duplicates.

**Comment 13 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Lowell

Last Name: Randel

Email Address: lranel@gcca.org

Affiliation: Global Cold Chain Alliance

Subject: Transportation Refrigeration Unit Regulation Concept

Comment:

Please find the attached comments from the Global Cold Chain Alliance (GCCA) regarding the proposed TRU Regulation Concept.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-truregulation-ws-UDddOANhUmBSCwhr.pdf>

Original File Name: GCCA CARB TRU Comments - April 27 Final.pdf

Date and Time Comment Was Submitted: 2020-04-27 13:31:11

No Duplicates.

Comment 14 for Transport Refrigeration Unit Regulation Concept (truregulation-ws) - 1st Workshop.

First Name: Jacqueline

Last Name: Moore

Email Address: jacqueline.moore@polb.com

Affiliation: Port of Long Beach

Subject: Port of Long Beach and Port of Los Angeles Comments for Draft TRU Regulatory Concepts

Comment:

The Ports of Long Beach and Los Angeles appreciate the opportunity to provide comments on the updated draft regulatory concept for Transport Refrigeration Units, attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-truregulation-ws-VzQCZQR3UWBXDgh8.pdf>

Original File Name: CARB TRU POLB POLA comment letter FINAL.pdf

Date and Time Comment Was Submitted: 2020-04-27 13:46:38

No Duplicates.

**Comment 15 for Transport Refrigeration Unit Regulation Concept
(turegulation-ws) - 1st Workshop.**

First Name: Joshua

Last Name: Bledsoe

Email Address: joshua.bledsote@lw.com

Affiliation:

Subject: Lineage Logistics Comments on TRU Regulation

Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-turegulation-ws-Uj4CbQRrWG4HYFM0.pdf>

Original File Name: Lineage Logistics 4_27_2020 Comment Letter on TRU Regulation.pdf

Date and Time Comment Was Submitted: 2020-04-27 14:22:44

No Duplicates.

**Comment 16 for Transport Refrigeration Unit Regulation Concept
(turegulation-ws) - 1st Workshop.**

First Name: Taylor

Last Name: Collison

Email Address: tcollison@caltrux.org

Affiliation: California Trucking Association

Subject: CTA TRU Rule Comments

Comment:

Please find attached CTA's comments on the TRU draft rule language.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-turegulation-ws-VDdcLgFhV1sKeFcl.pdf>

Original File Name: CTA TRU Draft Rule Language Comments 04272020.pdf

Date and Time Comment Was Submitted: 2020-04-27 15:41:26

No Duplicates.

**Comment 17 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Jelenic

Email Address: tjelenic@pmsaship.com

Affiliation: PMSA

Subject: PMSA Comment Letter on TRU Regulation

Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-truregulation-ws-UydXI1QgAAwBclcn.pdf>

Original File Name: TRU Updated Regulatory Concepts - PMSA Informal Comment Letter 4-27-20.pdf

Date and Time Comment Was Submitted: 2020-04-27 16:31:16

No Duplicates.

**Comment 18 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: John

Last Name: Kinsey

Email Address: jkinsey@wjhattorneys.com

Affiliation:

Subject: Comments on the Transport Refrigeration Unit Regulation Concept

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-truregulation-ws-BmpXNFAIVXJVfVUK.pdf>

Original File Name: Lett. to Transportaion and Toxics Division (01094157).pdf

Date and Time Comment Was Submitted: 2020-04-27 16:36:56

No Duplicates.

**Comment 19 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: John
Last Name: Larrea
Email Address: john@clf.com
Affiliation: California League of Food Producers

Subject: TRU Regulation

Comment:

CLFP Comments on CARB TRU Regulation Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-truregulation-ws-VTZXPVE2AyAKUwN3.pdf>

Original File Name: CLFP TRU comments 04272020.pdf

Date and Time Comment Was Submitted: 2020-04-27 16:50:58

No Duplicates.

**Comment 20 for Transport Refrigeration Unit Regulation Concept
(truregulation-ws) - 1st Workshop.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on TRU Regulation

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-truregulation-ws-WytTMgNnAAxSIAJw.pdf>

Original File Name: PGE TRU Draft Regulation Comments_04-27-20.pdf

Date and Time Comment Was Submitted: 2020-04-27 16:53:59

No Duplicates.

There are no comments posted to Transport Refrigeration Unit Regulation Concept (truregulation-ws) that were presented during the Workshop at this time.