

**Comment 1 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: Michael

Last Name: Cornett

Email Address: mcornett@tcstk.com

Affiliation: Temperature Control Solutions Inc

Subject: TRU Electric Operation

Comment:

With the well publicized intentional blackouts happening, seemingly more frequently, I think it is very important to address the challenges that exist for plugging multiple TRUs in at a facility. What happens if there is no electricity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-22 03:59:14

No Duplicates.

**Comment 2 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: SONIA

Last Name: TERRY

Email Address: terrysonia0007@gmail.com

Affiliation: SDY REFRIGERATION

Subject: Carbon Credits and Refrigerants?

Comment:

About how much damage do refrigerants R123A and R123 and R410 cause? How is it determined? What are its units metric? How do carbon credits relate to what I am asking?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-29 18:00:14

No Duplicates.

**Comment 3 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: SONIA

Last Name: TERRY

Email Address: terrysonia0007@gmail.com

Affiliation: SDY REFRIGERATION

Subject: TRU UNITS ARE IN MICRONS

Comment:

and you are measuring particulate size?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-29 18:12:50

No Duplicates.

**Comment 4 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: Joe  
Last Name: Dalum  
Email Address: joe.dalum@odyne.com  
Affiliation: Odyne Systems, LLC

Subject: Clarification of truck TRU proposed regulatory concept  
Comment:

Concept as shown on slide:

Starting in 2025, all truck TRU fleets phase in full zero-emissions at 15 percent each year (over 7 years).

Can you confirm that the chart below accurately represents the draft regulatory concept?

Proposed requirement for percent of new TRU sales on trucks in California per year with full zero-emissions operation of the TRU:

2025 = 15%  
2026 = 30%  
2027 = 45%  
2028 = 60%  
2029 = 75%  
2030 = 90%  
2031 = 100%

Can you confirm the proposed regulatory concept requires zero emissions operation of the TRU. It does not require zero emissions operation of the entire truck during propulsion.

Thank you,

Joe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-31 10:59:11

No Duplicates.

## **Comment 5 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: Norman

Last Name: Highnam

Email Address: Norman@Highnamassist.co.uk

Affiliation: Transport Refrigeration Consultant

Subject: TRU Emission

Comment:

I would first like to say that the report is exceptional in its details and content and the approach by the CARB is world leading.

I have spent the last 35yrs in the transport refrigeration community and I have a number of comments about the report.

1 - I would highly recommend that the all TRU's engines are subject to confirmation of service cycles on the engine and then a confirmation via emission testing that the engine is fit for purpose. (I.e. is performing to OEM set standards) If it failed then the TRU should be quarantined until fit for purpose.

2 - You talk about NOX - PM emitters but you must also consider the HFC gas emission and Global Warming Potential. Again an annual certified check of the refrigeration equipment should be carried out and recorded and units that fail are again quarantined until corrected and retested.

3 - You talk about retrofitting the TRU equipment with DPF filters and total equipment replacement. What's is the plan to promote NON diesel driven equipment. In the UK and EMEA area both Thermo King and Carrier promote ZERO emission equipment with low GWP gases. Why is this not in California it would work and do what you need for all distributions needs. But there are plenty of alternative types of TRU equipment in the UK and EU markets that would perform the tasks needed.

You have taken some great steps towards getting to the ultimate prize of Zero emissions and Zero GWP potential don't stop the momentum and don't allow the OEMs to control the market. Please get in touch if I can help you further.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-21 03:25:12

No Duplicates.

**Comment 6 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: Chris

Last Name: Shimoda

Email Address: cshimoda@caltrux.org

Affiliation:

Subject: CTA Comments

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-2019truei-ws-BmVdLwNjVViRNFI9.pdf>

Original File Name: CTA Comments TRUs emissions inventory HRA 11272019.pdf

Date and Time Comment Was Submitted: 2019-11-27 16:36:32

No Duplicates.

**Comment 7 for Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) - 1st Workshop.**

First Name: Kelly

Last Name: Ash

Email Address: kash@cagrocers.com

Affiliation: California Grocers Association

Subject: CGA and CRA comments on TRU regulation draft

Comment:

We appreciate the ability to comment on the proposed Transportation refrigeration unit (TRU) regulations. Representing the foremost retail and food industries in California, the California Grocers Association and the California Retailers Association request that the Board pursue the most cost-effective options for emissions reductions while maintaining availability and access for consumers to fresh and healthy food options which often require refrigeration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-2019truei-ws-BXFSJgF1WFRWMwVq.docx>

Original File Name: TRU Comments FINAL 12.2.19.docx

Date and Time Comment Was Submitted: 2019-12-02 16:28:40

No Duplicates.

**There are no comments posted to Docket to receive public comment on the Draft 2019 Emissions Inventory for TRUs (2019truei-ws) that were presented during the Workshop at this time.**