

**Comment 1 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: Brett  
Last Name: Kuntze  
Email Address: brettze@gmail.com  
Affiliation:

Subject: Tighten PCV hose connections, too  
Comment:

Those refrigerator units found perched on front ends of food transport trailers are usually powered with gasoline engines some similar to automotive types four in line . Whatever is used , just be sure to keep the PCV rubber hoses clamped from end to end which usually mean more than 8 clamps . Do not use spring clamps...use aircraft type clamps.. if you are not sure what an air craft clamp is, ask around.. do not rely 100% on electronic emission testings as you know PCV is not electronic..it is the oldest anti smog device being developed for cars andtrucks way back in 1964 and they are still in use in today's modern cars.. So , do not get carried away with things being electronic and that anything else needs not be checked.. This is a fatal if not an advanced stupid mistake ! mechanics are not exactly green types as you know... they couldn't care any less. So it will have to mean that more than double if not triple efforts may be necessary to recheck to make sure that all PCV hoses are tightened at all time.. The last thing motorists need is loose PCV hoses not only in refrigerator units but all other automobiles and pickups, etc. PCVs is still the chief source of sooty smoggy air we see at sunset... simply because there is still millions of them on the road with loose or even slightly loose hoses.. Strict controls is in order ! Smog check stations should be clobbered for not doing more !

Attachment: [www.arb.ca.gov/lists/com-attach/1-truhealthanalyses-ws-VzZdMgFyVlpXMwBv.jpg](http://www.arb.ca.gov/lists/com-attach/1-truhealthanalyses-ws-VzZdMgFyVlpXMwBv.jpg)

Original File Name: air boad pcv comment picture july 24 2016.JPG

Date and Time Comment Was Submitted: 2019-10-19 10:40:01

No Duplicates.

**Comment 2 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: SONIA

Last Name: TERRY

Email Address: terrysonia0007@gmail.com

Affiliation: SDY REFRIGERATION,

Subject: Just like to know how dangerous it is to my health R123 R1234yf and R410 and R123A

Comment:

Those are the refrigerants of interest and there effects on my health.

Kind regards,

Sonia Terry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-29 17:57:56

No Duplicates.

**Comment 3 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: Norman  
Last Name: Highnam  
Email Address: Norman@Highnamassist.co.uk  
Affiliation: Transport Refrigeration Consultant

Subject: TRU Emission and Health  
Comment:

Thank you for a great report on the health affect on the population directly effected by TRU equipment.

I have a few points to be considered please.

1 - I can find not reference to the health of the TRU service engineers - I was a service engineer for 12 yrs and every day you would come home covered in diesel and exhaust soot - mainly from the overcab units.

2 - I can find no reference to the drivers of the trucks and the trailers especially the ones that spend nights out with the TRU running behind them.

3- The report talks about the potential \$ cost to California and then looks at the reductions over a period of time when the concept is applied. It make no reference to the fact that if that \$ is applied to removing the existing equipment now then mortalities and long terms illness will be avoided. The TRU OEM manufacturers Carrier and Thermo King both promote ZERO emission and Low GWP equipment in the UK and EMEA area, but not in the USA. But there are other OEMS that can provide alternative equipment's with ZERO Emission and ZERO GWP. Any further questions then please get in touch.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-21 03:55:24

No Duplicates.

**Comment 4 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: John  
Last Name: Berge  
Email Address: jberge@pmsaship.com  
Affiliation: Pacific Merchant Shipping Association

Subject: PMSA Comment on TRU Health Analysis  
Comment:

Thank you for the opportunity to provide comment on behalf of the members of the Pacific Merchant Shipping Association (PMSA) to the CARB TRU Preliminary Health Analysis. Our members include ocean carriers who own or lease and operate TRU gensets and refrigerated intermodal ocean containers, as well marine terminal operator who receive, deliver and garage this equipment on behalf of the ocean carrier.

While we reserve the right to provide further comment on both the TRU Emissions Inventory and Health Analysis at a later date, our comment today is in regards to cancer risk assessments put forward at the October 31 workshop in Sacramento. Specifically, ARB needs to more clearly demonstrate the validity of assessing cancer risk at proximities close to emission sources.

The model estimates presented provide for residential exposure cancer risk levels at proximities as close as 0 meters, with incremental risk levels provided for subsequent proximities of 10, 25, 50, 75, 100 150, 200 and upwards to 800 meters from source. Modeling of cancer risk is inherently less accurate at closer proximities, and previous risk modeling used more distant proximity metrics of 200 meters or greater. Furthermore, it is inappropriate to be using Residential Receptor, exposure durations at distances closer to emission sources than where residential housing is or would be situated.

We believe that ARB should restrict their modeling to greater distances to enable more accurate predictions. This is further supported by ARB guidelines and typical city and county land use requirements that suggest or stipulate buffer zones greater than those used in this model.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-21 10:20:42

No Duplicates.

**Comment 5 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: Yasmine

Last Name: Agelidis

Email Address: yagelidis@earthjustice.org

Affiliation: Earthjustice

Subject: Comments on Preliminary Health Analysis Emissions Inventory for TRUs

Comment:

On behalf of the undersigned organizations, we respectfully submit the following comment in response to the California Air Resources Board's preliminary health analysis and emissions inventory for Transportation Refrigeration Units.

Attachment: [www.arb.ca.gov/lists/com-attach/5-truhealthanalyses-ws-VjVROARoBDoBYgBu.pdf](http://www.arb.ca.gov/lists/com-attach/5-truhealthanalyses-ws-VjVROARoBDoBYgBu.pdf)

Original File Name: Comments - TRU Regulation - 11.19.2019.pdf

Date and Time Comment Was Submitted: 2019-11-21 16:25:11

No Duplicates.

**Comment 6 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-ws) - 1st Workshop.**

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association in California

Subject: Comments on TRU inventory and health analyses

Comment:

Please see the attached letter submitted on behalf of the American Lung Association, Central California Asthma Collaborative and Coalition for Clean Air in re: TRU emission inventory and health analysis workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/6-truhealthanalyses-ws-B2YFb1AwAg5VMFIx.pdf](http://www.arb.ca.gov/lists/com-attach/6-truhealthanalyses-ws-B2YFb1AwAg5VMFIx.pdf)

Original File Name: ALA\_CCAC\_CCA\_TRU letter.11.21.19.pdf

Date and Time Comment Was Submitted: 2019-11-22 09:40:02

No Duplicates.

**Comment 7 for Docket to receive public comment on the Draft Health Analyses for TRUs (truhealthanalyses-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: [www.arb.ca.gov/lists/com-attach/7-truhealthanalyses-ws-B2QBc109VloBZABv.pdf](http://www.arb.ca.gov/lists/com-attach/7-truhealthanalyses-ws-B2QBc109VloBZABv.pdf)

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

Date and Time Comment Was Submitted: 2019-11-27 16:37:44

No Duplicates.

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