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EXECUTIVE OFFICER/APCO

Connect with the  
Bay Area Air District:



September 20, 2021

Chairperson Liane Randolph  
California Air Resources Board  
1001 I Street  
Sacramento, CA

Re: Support for Proposed Amendments to the In-Use Transportation Refrigeration Unit ATCM

Dear Chairperson Randolph:

Thank you for the opportunity to comment on the proposed amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets. The lower engine emissions standards for new engines, the requirements for the use of refrigerants with a lower potential to contribute to climate change, and the phase-in of zero-emission refrigeration units on trucks will help the Bay Area reach and maintain the Federal and State ambient air quality standards, continue moving us in the right direction for achieving needed greenhouse gas (GHG) reductions, and further reduce exposure to toxic air contaminants within heavily impacted neighborhoods. The Bay Area Air Quality Management District strongly supports these amendments and Air District staff urges the Board to adopt them.

The setting of lower emissions standards for diesel-powered engines in new shipping container and rail refrigeration units are an important interim step on the path towards the adoption of zero-emission standards for these classes of TRUs. We commend CARB staff for including diesel engines below 25 horsepower, a growing class of engines that previously had less stringent emissions standards. These new standards will assist in lowering cancer risks and other health issues caused by exposure to diesel particulate matter, particularly in AB 617 communities that are adjacent to ports and rail yards, such as West Oakland and Richmond-San Pablo. We especially commend CARB staff for including the requirement that new TRUs beginning in 2023 must use refrigerant gases with a Global Warming Potential (GWP) less than or equal to 2,200 or use no refrigerant at all. The long-term benefits of this requirement in reducing climate impacts cannot be overstated.

The proposed amendments requiring the phase-in of zero emission refrigeration units on trucks over seven years will be particularly beneficial in further reducing risk from diesel particulate matter. We applaud CARB staff recommending a shared compliance approach between truck owners and the operators of large warehouses, grocery stores, rail yards and marine terminals. This approach will help ensure only trucks with compliant

refrigeration units enter a facility, and that adequate infrastructure for zero-emission refrigeration units is made available. CARB staff estimate that approximately 900 facilities in the Bay Area will need to comply under the proposed amendments. It is important to note that the benefits will extend beyond these covered facilities and adjacent communities, as the trucks with zero-emission refrigeration units will be used to deliver products to approximately 7,000 additional smaller facilities within our region, such as corner markets, small businesses, and restaurants.

Because of the critical near-term need to reduce exposure to diesel pollution in heavily impacted communities, Air District staff supports the continued use of incentives for the early deployment of the zero-emission refrigeration units and related infrastructure. We recommend that priority be given to smaller trucking and delivery firms whose facilities are not covered by the proposed amendments, and to facilities located within AB 617 communities. The existing strong collaboration between CARB and local Air Districts is a proven means for efficiently deploying commercially available zero-emission technologies; the growing partnerships between the AB 617 communities, CARB, and local Air Districts provides a means for ensuring equitable funding in areas where early compliance is critically needed. Maintaining and enhancing these partnerships should be a key part of any State financial assistance for early compliance with the proposed control measure.

In closing, I would like to again express my appreciation CARB staff's efforts to reduce impacts from refrigeration units. The Air District is committed to supporting your efforts by providing early compliance assistance and coordination with our AB 617 communities. I look forward to our ongoing collaboration.

Sincerely,



Jack P. Broadbent  
Executive Officer/APCO

JPB:VE:GN

cc: Members, BAAQMD Board of Directors  
Richard Corey, Executive Officer, CARB