

**PROPOSED REGULATION FOR THE TRANSPORT REFRIGERATION UNIT REGULATION
DRAFT REGULATORY LANGUAGE FOR STAKEHOLDER REVIEW
INFORMAL DRAFT DATED 3/12/2020**

Navy Region Southwest Comment Matrix

#	Location			Comment	Requested Revisions
	Page	Line	Section		
§ 2478.5. Exemptions					
1	10		(a).	We appreciate the inclusion of an exemption for Military Tactical Support Equipment in this draft regulatory concept. In addition to that exemption, we request the addition of an exemption for Military Tactical Vehicles found in similar legislation and regulations such as CARB’s Advanced Clean Truck proposed regulation and the In-Use Heavy-Duty Diesel-Fueled Vehicles regulation.	<p><u>Add an exemption for military tactical vehicles to the end of 24785(a) to state:</u></p> <p><i>Military tactical support equipment and military tactical vehicles owned or operated by the United States Department of Defense or a specific military Service.</i></p>
§ 2478.4. Definitions					
1	3			<p>We request a clearer definition of ARB’s intent with the term “Geofence”. What is an Applicable Facility’s geofence boundary?</p> <p>Establishing a Geofence for Department of Defense (DoD) installations meeting the definition of Applicable Facility may be challenging. Commissaries, refrigerated warehouses and distribution centers are typically located within a secure military installation fence line. Would the geofence be the installation boundary or start at some other defined geographical location (e.g., parking lot of the building)? This is an example of one of unique issues associated with applying this regulation to military facilities.</p>	

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2	4			<p>We request that ARB revise the definition of a “fleet” in the regulation to allow fleets to be defined at the military installation level.</p> <p>Military installations may operate small fleets of TRU vehicles and trailers or TRU generator sets that are dedicated to a specific installation. Because these fleets operate at a specific installation, their operations and maintenance are overseen by that specific installation. By revising the fleet definition, each applicable facility would then have their own Responsible Official certify compliance for these dedicated equipment types. This is another example of the unique issues associated with applying this regulation to military facilities.</p>	<p><u>Amend the definition of “fleet” to:</u></p> <p>“Fleet” means all TRUs owned by a Person <i>or military installation</i> that are operated in the State of California and are subject to this regulation. A fleet may consist of one or more TRUs. A fleet does not include TRUs that do not operate in the State of California.</p>
3	7			<p>For the purposes of this regulation, the definition of “Port” does not appear to apply to the mission of military ports. Because of this, we would request formalization of this intent with a clarified definition of “port.”</p>	<p><u>Amend the definition of “port” to:</u></p> <p>“Port” means any <i>non-military</i> port or independent marine terminal in California that receives an ocean-going vessel including:...</p>