

What to Expect and How to Meet California's Clean Truck Requirements

Most Truckers Must Comply with New CA Truck Pollution Program

Whether or not a truck is registered in California, any carrier that hauls freight within or into the state must comply with the California Air Resources Board's (CARB's) new "clean truck" requirements.

These new requirements are an initial step toward implementing California's declaration that all trucks operated in the state must be zero-emission vehicles (ZEVs) – that is, 100% electric – by 2035 or later, depending on the size or type of truck. While 2035 is years away, the "clean truck" registration program is happening right now, affecting hundreds of thousands of operators and trucks.

Annual Truck Registration Requirement

Any truck traveling in or through California must be registered with CARB starting October 1, 2023 and the registration renewed every year thereafter as long as the truck is being operated in California. During the initial 3-month reporting period October 1 to December 31, truck owners must establish owner accounts with CARB, provide owner/vehicle information, pay a \$30/vehicle registration fee and receive a compliance certificate. As explained further, obtaining this certificate is extremely important.

Roadside Truck Pollution Screening

Roadside pollution checks of heavy-duty trucks started in January this year (2023) using mobile screening technology. Unlike the smoke check CARB has utilized for many years, this technology can record unseen pollution coming from the truck.

These inspection sites are located at ports of entry, weigh stations or scale facilities or randomly in rest areas and at other roadside locations.

In addition to the pollution screening, CARB inspectors will also look to see if the malfunction indicator light on the dashboard is lit up, indicating a potential emissions problem. CARB is also permitted to request and utilize the on-board diagnostic data (OBD) for each truck manufactured after 2013.

Photo at right shows an out-of-state truck being screened for pollution at one of many roadside screening sites around California.



For older trucks, CARB will continue to use its smoke opacity tests that show visible truck emissions, including soot, and can continue to issue citations for excessive smoke.

Notice to Submit to Testing (NST)

Owners of trucks that are screened in roadside tests may receive a Notice to Submit to Testing (NST). These tests are more extensive and must be conducted by a certified tester.

Carriers have two options available to them upon receiving an NST: hire an external testing service certified to conduct the tests or train someone employed in the carrier's business to perform these tests. Credentialed testers who perform these tests are listed on CARB's website. The website also offers CARB's free, online training course to obtain a testing credential.

(continued next page)

Notice to Submit to Testing (NST) - continued

To be approved to perform certified tests, individuals applying for testing credentials must pass the online exam and submit the results to CARB within 30 days of completion. The fleet or truck owner must purchase a CARB-approved OBD reader and software, or a smoke opacity meter if testing pre-2013 vehicles.

Semi-Annual Testing Requirement

Following initial registration, carriers must test most vehicles twice a year and submit test results to CARB. Emission testing can be completed through options described above or through a potential telematics offering expected soon.

The formal testing phase of the program begins in July 2024, but it’s not too soon to think about how best to comply. Non-CA plated vehicles have 90-days to conduct these tests prior to their assigned month based on the last number of the VIN. (Refer to the chart below). For example, a truck with a VIN number ending in 4 will need to be tested and certified by February 1 and every six months thereafter.

Exceptions to Registration and Testing Requirements

The CARB regulations include only one type of waiver/exception in the form of a one-time 5-Day Pass, valid once a year per truck for short-term exceptions. We do not see this exception as workable except in rare instances where a carrier may be asked to make a one-time California pickup or delivery utilizing a vehicle not registered with CARB.

Shipper, Receiver, Broker Requirement

In addition to emissions testing required of any carrier operating trucks in California, any shipper or receiver for whom carriers haul freight, along with any brokers involved in freight transactions, must also prove that the carriers with whom they do business in California have met the registration requirement. While this requirement doesn’t directly hit carriers, it is conceivable that carriers’ customers will ask the carrier to provide their proof of CARB registration directly to the businesses they serve.

Assigned Testing Month for Non-CA Vehicles

Last Number of VIN	0	1	2	3	4	5	6	7	8	9
Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul

MORE INFORMATION ABOUT CARB’S TRUCK POLLUTION PROGRAM

ICSA members can log in to their member profile on the ICSA website (www.safecarriers.org) and listen to the recording of the recent webinar on the CARB Clean Truck Program. Other information is available at [Clean Truck Check \(HD I/M\)](#) | [California Air Resources Board](#).

ABOUT ICSA: This Arizona-based non-profit was formed in 2019 to provide independent contractors and small carriers with safety tools, safety education, a range of services and critical information they need to be a part of improving safety on our highways. In turn, carriers that meet ICSA safety requirements may qualify to participate in ICSA’s group insurance program.

Visit our website and learn more about our team and services. Contact ICSA today at <https://www.safecarriers.org/contact-us/> or 866-SAFE-TRK

