



03/18/26

CARB Clarifies Clean Truck Check Enforceability

The **California Air Resources Board (CARB)** updated the [Clean Truck Check \(CTC\) FAQ page](#) to clarify the program's enforceability following the U.S. EPA's partial disapproval of **California's State Implementation Plan (SIP)** as it relates to the CTC program.

Background

On January 27, 2026, the U.S. EPA issued a final partial disapproval of California's Heavy-Duty Vehicle Inspection and Maintenance (HD I/M) program for State Implementation Plan (SIP) emission reduction credit regarding vehicles registered out-of-state and out-of-country. California's HD I/M program is better known as Clean Truck Check.

California is required by federal law to submit a comprehensive plan, referred to as a SIP, that describes how the State will attain national ambient air quality standards (NAAQS) for ozone. As context, the CTC program is estimated to reduce more NOx emissions (an ozone precursor) than the Advanced Clean Fleets, Advanced Clean Truck and Low NOx Omnibus regulations combined.

In August 2025, EPA indicated their intention to partially disapprove the program's incorporation into the SIP for out-of-state and out-of-country fleets. The partial disapproval prevents California from factoring in all of the emission reductions for the program. Only the emission reductions from California registered vehicles will count towards the state's federally mandated attainment demonstration.

Updated FAQ

Do vehicles registered outside of California still need to comply with Clean Truck Check?

Clean Truck Check is still in effect for all vehicles operating on California public roads and highways.

On January 27, 2026 U.S. EPA announced its **partial** disapproval of the **State Implementation Plan (SIP)** relating to Clean Truck Check.

This **only** means that the state cannot credit the portion of emissions reductions from out-of-state vehicles as part of meeting federal air quality standards.

This decision does not extend to determining, or enforcing, any part of Clean Truck Check to ensure all vehicles operating in California abide by the same rules, including vehicles registered outside of California.

This is affirmed in footnote 49 of U.S. EPA's final rule on Clean Truck Check (Heavy-Duty Inspection and Maintenance Program).

What is the impact of the rescission of the U.S. E.P.A.'s Endangerment Findings on Clean Truck Check?

The US EPA's rescission of the 2009 Greenhouse Gas Endangerment Finding has no impact on the implementation of the Clean Truck Check program. Clean Truck Check remains in effect as it is not a greenhouse gas regulation. Clean Truck Check ensure that we get fine particulate matter and oxides of Nitrogen emission reductions.

<https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-rescission-greenhouse-gas-endangerment>

Do recent U.S. E.P.A waiver rescissions impact Clean Truck Check?

Clean Truck Check does not require a US EPA waiver under the Clean Air Act. The US EPA has no authority over Clean Truck Check. The California Air Resources Board will continue to enforce the law to ensure that all heavy-duty vehicles operating in California abide by the same rules.

You can find the full FAQ for the **Clean Truck Check** program by [clicking here](#).