



01/27/26

Update on California's Heavy-Duty Vehicle Inspection and Maintenance Program

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 (CTC).

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.

What This Means for Carriers:

Impact to fleet CTC compliance obligations, whether registered in California or out-of-state, is unclear at this time.

We are seeking clarification on the program's applicability and enforceability for out-of-state fleets and will share more information with members as information becomes available.