



## Clean Air Board of Central Pennsylvania

Comments before the Environmental Quality Board

February 13, 2008

Good Afternoon. My name is Thomas Au. I am here today on behalf of the Clean Air Board of Central Pennsylvania.

The Clean Air Board was formed in the fall of 2005 after over 100 Cumberland County physicians signed an open letter in the newspapers informing the community of the growing danger of ozone and particulate pollution. The medical professionals observed that many of the health problems they see were attributable to air pollution that we all breathe. The letter stated: “Breathing diesel emissions containing these fine particulates can result in exacerbation of lung disease, i.e., asthma and emphysema, and can precipitate heart attacks. The populations at particular risk include infants, children, and the elderly with pre-existing heart and lung disease.” The Clean Air Board now includes people from many walks of life – ministers, teachers, doctors, lawyers, businessmen, civic leaders, and ordinary citizens.

The Clean Air Board of Central Pennsylvania is a faith-based citizens’ initiative dedicated to achieving clean air to protect our health and quality of life. We accomplish our mission by: raising public awareness of air quality issues; advocating, promoting and coordinating policy and practices for clean air; and, monitoring air quality. CAB is an entirely volunteer organization. We have no paid staff.

One of the air pollution problems the Board has identified in central Pennsylvania is the concentration of diesel exhaust emissions at rest stops, truck stops, and along the sides of roads. Due to an extensive interstate road system and geography, Pennsylvania has become a transportation and distribution hub for the nation. Every truck that idles over a long period of time at rest stops and truck facilities adds pounds of ground level pollutants.

The Board examined strategies that can significantly reduce the amount of air pollution produced by commercial vehicles with diesel engines. Idling by large diesel powered vehicles contributes significantly to ground level fine particulate matter pollution (PM 2.5) and leads to the formation of ozone pollution. The Board has met with local governments, the trucking industry, and civic groups to better understand the problems that truck and bus operators face if a regulation or statute is adopted. The Board also discussed the problem of enforcement with municipalities which already have adopted limitations on idling.

On October 16, 2006, the Clean Air Board filed a petition with the Environmental Quality Board to adopt a state-wide regulation to limit idling of diesel powered vehicles. The Clean Air Board's 2006 petition asked the Department of Environmental Protection and the EQB to adopt regulations to limit idling by commercial diesel vehicles.

In drafting a proposed regulation for the Environmental Quality Board and the Department of Environmental Protection to consider, the Clean Air Board recognized that certain operational needs of the transportation industry may require some amount of idling. We included exemptions that would accommodate these operational needs. However, we recognize that idling for the sole purpose of heating and cooling of cabs has been made unnecessary by appropriate modern technology. Air quality benefits can also be achieved by reducing the amount of unnecessary idling that occurs when vehicles are waiting to load and unload.

The residents of Cumberland County are keenly aware of this diesel exhaust pollution. DEP's studies have concluded that Cumberland County experiences the highest number of long duration idling hours in the Commonwealth. Idling emissions are a growing problem with the increase of long-haul diesel trucks traveling the highways of the Commonwealth. Where diesel trucks and buses congregate -- at truck stops, rest areas, and parking lots -- the concentration of emissions is especially harmful to those who must breathe these emissions -- workers, drivers, residents. Along with direct emission of fine particulate, diesel powered vehicles emit nitrogen oxide (NOx) and volatile organic compounds (VOCs), both of which contribute to ground-level ozone and particulate matter. Ozone and fine particulate matter are pollutants that can cause or exacerbate breathing problems, especially in people with pre-existing respiratory conditions such as asthma, bronchitis and emphysema. These air pollution concerns are not only evident in central Pennsylvania, but are also evident in communities along our major transportation arteries across the state.

Excessive idling unnecessarily wastes fuel. One gallon of diesel fuel is burned for every hour spent idling. DEP estimates that diesel trucks spend 22.3 million hours a year in Pennsylvania in long-duration idling (idling for more than 15 minutes) - approximately 95 percent of which is due to truck travel rest periods. If each of the 13,000 long-haul trucks that idle in Pennsylvania each day used alternative means to provide power during rest periods, diesel fuel use would be cut by more than 20 million gallons per year. We believe that many in the transportation industry recognize the economic value of reducing idling time.

The proposed idling regulation is consistent with the EPA model rule and the state rules in those states which have adopted idling regulations. Pennsylvania is only state in the northeast that does not have an idling rule. The current situation may encourage some operators to rest in Pennsylvania and idle their trucks in Pennsylvania, thereby aggravating our air pollution problems. Other communities in Pennsylvania, such as those along I-80 in Luzerne County and along I-78 in the Lehigh Valley, also receive a disproportional share of long-duration idling emissions.

Many trucking operators and companies have installed auxiliary power systems, battery operated systems, and other idling reduction systems on their diesel vehicles to avoid the need to run the main engines to heat or cool the cab during rest periods. Technology has been developing rapidly to ensure the comfort of drivers during mandated rest periods. Among other initiatives, the Commonwealth has supported the installation of the Idle-Aire heating and cooling systems at several truck stops in Pennsylvania. The May 1, 2010 expiration date for the temperature related exemption of idling during rest periods provides companies and drivers with sufficient time to install bunk heaters, battery systems, or auxiliary power units (APUs). The regulation also requires truck operators to use existing facility electrification systems, such as Idle-Aire, if they are installed and available for use. We believe this is a sensible requirement and we support this requirement.

We do not support any additional exemptions for idling, other than the ones listed in the proposed regulation. As stated earlier, the proposed regulation accommodates legitimate operational needs of the transportation industry, as stated in sections 126.612(a)(3), (a)(4), and (a)(5), and in other provisions of the proposed regulation. Turning engines on and off while waiting to load and unload, where the truck or bus is not on a public road, is not an undue burden.

We believe that we need to protect school children from unnecessary exposure to diesel emissions, while protecting their safety. We recognize that there may be certain limited situations, where school buses may need to idle on public streets in order not to tie up traffic while waiting to pick up children. This is covered in section 126.612(a)(11) of the proposed regulation. When school buses are on school property, there are no such traffic concerns and they should not idle. We suggest that the exemption for school bus idling be clarified to allow such idling to public streets and not allow such idling while on school property.

Because of our shared concerns about the quality of the air we are breathing and the need to take steps to reduce diesel engine idling emissions, we have circulated a petition among local residents and communities in support of the proposed regulations. The Clean Air Board is pleased to submit petitions signed by over 1,400 central Pennsylvania residents supporting the Environmental Quality Board's action in proposing these regulations. The petitions include the resident's name, address, municipality, and zip code. Signers include residents of Cumberland County, Dauphin County, Lancaster County, York County, Perry County, and other counties. Most of the signers of the petition are not members of the Clean Air Board. These citizens signed the petition because they are interested in improving our air quality and interested in this proposed regulation.

The Clean Air Board wants to publicly thank the members of the Environmental Quality Board and the staff of the Department of Environmental Protection for the work that you have put into this proposed regulation. You have listened to our concerns. You have tried to address our concerns. In the end, we believe you will adopt regulations that we can be proud of.