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From: Marilyn Skolnick <emkhs@concentric.net>
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INDEPENDENT REGULATORY
REVIEW COMMISSION ENVIRONMENTAL QUALITY BOARD

Please Reply To:

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TO: The Environmental Quality Board
FROM: Marilyn Skolnick, Transportation Chair Sierra Club Allegheny Group
SUBJECT: Diesel Vehicle Idling ; 25 PA Code CHS.121 and126

In 2004, EPA designated 8 areas in the Commonwealth and all or part of 19 counties not in attainment for National Ambient Air Quality Standards for fine particles. One part of the solution in reaching attainment can be found in the limiting of the idling of diesel-powered commercial vehicles. These vehicles, it is estimated by EPA, to be responsible for a major part of the emission of fine particulates that result of the vehicles idling at rest stops or truck stops. Truckers idle their trucks to either keep the cab warm or cool depending upon the weather.

School buses, a special category of diesel powered vehicles, carry an especially vulnerable category of individuals as passengers, the young. These students are exposed to these emissions daily.

While there are no exact figures from current analysis, it is estimated that these vehicles will emit 180,000 tons of NOX and 3,250 tons of PM2.5 in 2009.

These proposed rules would go a long way towards reducing NOX, VOV's and particulate matter with the added benefit of reducing the need for diesel fuel. Much fuel is consumed by the idling of vehicles.

While we acknowledge that no single solution exists that will result in attainment, we must take every opportunity that presents itself to assist in the effort to do so. To that end, the Sierra Club Allegheny Group (in South Western Pennsylvania) supports the proposed regulation as written and, urge its implementation as quickly as possible. The health of many people depends upon it.

As to how to enforce the regulation, the truck and bus owners must be able to show how they have complied, on a quarterly basis. Comparing fuel consumption with the milage could be one tool.

Thank You.