

Cooper, Kathy

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From: mtate@state.pa.us  
Sent: Monday, February 04, 2008 2:42 AM  
To: IRRC

2008 FEB -4 AM 10:30

Subject: Proposed Rulemaking - Diesel Vehicle Idling; and Auxiliary Power Systems (#7-422)

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: Proposed Rulemaking - Diesel Vehicle Idling; and Auxiliary Power Systems (#7-422)

The Environmental Quality Board (EQB) has received the following comments regarding the above-referenced proposed rulemaking.

Commentor Information:

Jimmy Frost  
Private Citizen JCFrost2240@yahoo.com  
2240 Windom Place  
Virginia Beach VA 23454 US

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I am a long-haul trucker who visits Pennsylvania often at all times of the year, so this regulation regarding idling diesel engines would have a direct impact on me. I understand that the days of idling diesel engines are numbered, however I implore you to consider the impact that any regulation would have on the driver who is forced to obey the regulation you adopt. In New York, they have a regulation that you cannot idle your engine for more than 5 minutes every hour unless the temp is below 25. I would ask, would you like to be made to wake up every hour, turn your house thermostat on for 5 minutes and then go back to bed? Sadly, trucks do not have much insulation in them, only a thin piece of foam rubber and can become cold inside quickly. I can see the merit of reducing engine idling, I would ask that you have an exemption for drivers who are in the sleeper berth taking a rest-break in order to allow drivers to have their uninterrupted break without the possibility of suffering hypothermia. It is also important to point out that in the summer, the temps inside trucks can soar into triple digits, especially in the daytime. How can a human be expected to get a decent rest after a long nights run when the daytime temp is 85 or 90 and the temp inside the cab can be over 100 or more? Please remember that regardless of your intentions to protect air quality, drivers of these trucks are humans. Second, there are very few alternatives afforded to company drivers operating company equipment such as idle-air or gen-packs. There is a finite number of idle-air parking spots and unfortunately, many trucking companies will not equip their rigs with gen-packs for heating or cooling as this is an additional expense they would have to pay. Many of the companies response to the different idling laws has been, "just let the driver pay the fine-it's his problem". This is an unfair way to treat people and I feel that if you are going to cite the driver, you should also sanction the owner of the truck for not having equipped the truck with a gen-pack to give the driver a choice between obeying the law and survival. Finally, I would ask that those of you in the position to make a regulation that others, who live in these trucks for days, weeks and months at a time, spend a night sleeping in your car during a cold winters night or on a hot summer day while observing the exact same rule that you wish to enact. If you are not willing to do that, then perhaps you should consider delaying the final rule until such time as those you seek to regulate have a viable and easily accessible alternative to engine idling. As things stand right now, it is quite literally a matter of survival for truckers. If you are not willing to experience what you are asking us to do, then how can you expect a trucker to do anything but defy this rule out of necessity? Jimmy Frost, Virginia Beach, VA

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Please contact me if you have any questions.

Sincerely,  
Michele L. Tate

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Michele L. Tate  
Regulatory Coordinator  
PA Department of Environmental Protection

2/4/2008

Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Office: 717-783-6395  
Fax: 717-783-8926  
mtate@state.pa.us