Cooper, Kathy

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Sent:

Friday, February 29, 2008 9:40 AM

2008 FEB 29 AM 11: 22

To:

**IRRC** 

Subject: Proposed Rulemaking - Diesel Vehicle Idling; and Auxiliary Power Systems (#7 422) NEW ACLARICAL TO BE STATE OF THE PROPERTY OF THE PR

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:

Kathleen Hubert

Carlisle Area Health & Wellness Foundation khubert@cahwf.org

274 Wilson Street

Carlisle PA 17013 US

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I am writing on behalf of the Carlisle Area Health & Wellness Foundation (the Foundation) to express support for the proposed Diesel Vehicle Idling rulemaking as published in the January 12, 2008 Pennsylvania Bulletin. Our mission is to identify and address healthcare needs and policies, promote responsible health practices, and enhance access to and delivery of health services. As you know, the U.S. Environmental Protection Agency has designated the Carlisle region to be in non-attainment of the federal health standards for ozone and fine particulates, both of which are proven health hazards. Many of our area residents were already aware of local air quality problems due largely to efforts by the Clean Air Board, who have petitioned for this proposed rulemaking. One of the Foundation's major focus areas is prevention of major chronic disease, including asthma. We are deeply concerned about the impact of diesel emissions in the Carlisle area, and also want to be sure that stationary source emissions are not ignored, as they are the largest source for both NOx and fine particulates. The Foundation had engaged the help of the Clean Air Council, which has a legal and scientific understanding of pollution issues and strategies that improve air quality, to prepare research and guide us to recommend solutions. The Carlisle Area Air Quality Assessment Report, a study released in February 2007 by the Foundation, noted that Cumberland County air quality is in the bottom four per cent nationally, and is the 13th worst of 67 counties in Pennsylvania adversely affected by diesel pollution. The Carlisle Area Health & Wellness Foundation has developed a public policy statement that is consistent with this DEP proposed rulemaking. Our statement includes the following recommendations at the state level: adopt diesel cleanup measures as federally-enforceable requirements in State Implementation Plans (SIPs) for the attainment of fine particulate matter and ozone air quality standards; enact legislation to reduce diesel exhaust, including improved diesel retrofits, cleaner alternative fuels, crankcase ventilation systems to eliminate interior exhaust, engine rebuild and replacement requirements, and truck stop electrification systems (like IdleAire); enact statewide anti-idling legislation that includes enforcement. We offer our willingness to work with the Pennsylvania Department of Environmental Protection to reduce diesel emissions, monitor stationary source emissions, promote Alternative Fuels Incentive Grant (AFIG) Program, and ensure that the State Implementation Plans (SIPs) foster attainment of the federal fine particle and ozone standards. We know that neighboring states have adopted limits on idling (Delaware, Maryland, New Jersey, New York), and the Foundation is extremely pleased that the DEP has responded to the Clean Air Board petition by proposing these regulations. Thank you for the opportunity to provide comment.  $\overline{\phantom{a}}$ 

Please contact me if you have any questions.

Sincerely,

Michele L. Tate

Michele L. Tate

Regulatory Coordinator

2/29/2008

PA Department of Environmental Protection 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