Cooper, Kathy

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From:

mtate@state.pa.us

Sent:

Monday, March 03, 2008 11:45 AM

To:

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2008 MAR -3 PM 3: 49

Subject: Proposed Rulemaking - Diesel Vehicle Idling; and Auxiliary Power Systems (#7-1422) ENDENT REGULATORY

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:
Joseph Walsh
Covanta Energy jwalsh@covantaenergy.com
40 Lane Road
Fairfield NJ 07004 US

The following comments are provided to the Environmental Quality Board based on the proposed draft revisions to 25 Pa. Code Chapters 121 and 126, dated January 12, 2008. Covanta Energy operates three resource recovery facilities in the Commonwealth. As part of the daily operation of these facilities, municipal solid waste is received via truck on a recurring basis. Depending on the time of day and day of the week, these trucks typically queue within the facility boundary prior to entry onto the facility tipping floor where the solid waste is off-loaded. The progression of queued trucks within the facility boundary is dependent on the traffic on the tipping floor. During particularly high volume periods, trucks may wait for up to 30 minutes or more prior to entering the tipping floor. Throughout this waiting period, the trucks typically make incremental forward progress, which may include periods of incidental engine idling. Such incidental idling is difficult to both predict and control. While we applaud the EQB's effort to reduce emissions from idling diesel engines, we request that the Board revise the proposed regulations to exclude incidental idling. In the neighboring State of New Jersey, the Department of Environmental Protection (NJDEP) has adopted diesel engine idling restrictions which specifically exclude "any motor vehicle idling in traffic, or a motor vehicle other than a school bus idling in a queue of motor vehicles, that are intermittently motionless and moving because the progress of the motor vehicles in traffic or the queue has been stopped or slowed by the congestion of traffic on the roadway or by other conditions over which the driver of the idling motor vehicle has no control" (NJAC 7:27-14; underline added). The intent of this provision, as discussed by the NJDEP in their rule proposal (38 NJR 3728(b)) is to exempt vehicles that wait in lines over which they have little or no control. In the Board's rule proposal, it is estimated that idling at rest stops, truck stops and rest areas accounts for 78% of total diesel engine idling hours. The adoption of an exemption for incidental idling would not materially impact the control of idling at these locations. KEVIN CONNOR, FACILITY MANAGER LANCASTER COUNTY RESOURCE RECOVERY FACILITY CONOY TOWNSHIP, PA TIMOTHY GREGAN, FACILITY MANAGER COVANTA DELAWARE VALLEY, LP CHESTER PA JOHN MOFFITT, FACILITY MANAGER HARRISBURG MATERIALS, ENERGY, RECYCLING AND RECOVERY FACILITY HARRISBURG, PA \wedge

Please contact me if you have any questions.

Sincerely,

Michele L. Tate

Michele L. Tate Regulatory Coordinator PA Department of Environmental Protection Rachel Carson State Office Building P.O. Box 2063