From:

mtate@state.pa.us

Sent:

Monday, March 17, 2008 4:06 PM

To:

**IRRC** 

2008 MAR 17 PM 4: 19

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

Rich Raiders

Arkema Inc. rich.raiders@arkema.com

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King of Prussia PA 19406 US ^^^^^^

Arkema Inc. submits these comments pertaining to the Pennsylvania Environmental Quality Board (EQB) January 12, 2008 proposed air toxics regulations, 25 Pa. Code Chapters 121 and 126 (38 Pa. B. 229). Arkema operates two manufacturing facilities, a Research and Development Center, and a North American headquarters in the Commonwealth. Arkema also ships many truckloads of various products into and through the Commonwealth. In general. Arkema supports the proposed rulemaking to limit idling emissions in Pennsylvania. Arkema supports many of the exemptions proposed at 25 Pa. Code 126.612(a), specifically provisions relating to driver comfort in hot or cold operating conditions at (a)(1), required work-related engine operations at (a)(4), and safety related provisions at (a)(8). EQB appropriately recognizes that not all Pennsylvania truck stops are electrified at the date of promulgation. EQB appropriately recognizes that situations exist requiring truck idling, such as pickup and delivery trucks where the motive force for the pumps, compressors, or lifts managing the flow of materials onto or from the truck is the idling engine. Many trucks in service today operate with single engines with all material transfer systems integrated into the main drive system. Arkema appreciates EQB allowing trucks to idle to prevent a safety hazard. As a chemical manufacturer, Arkema markets materials that require specific methods to facilitate safe handling, often including refrigeration of the cargo. EQB appropriately determined that some truck idling might be required to ensure the safety and security of specific cargo.  $\hat{\Lambda}$ 

Please contact me if you have any questions.

Sincerely,

Michele L. Tate

Michele L. Tate

Regulatory Coordinator

PA Department of Environmental Protection

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