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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:

David Brooman  
Drinker Biddle david.brooman@dbr.com  
1000 Westlakes Drive Suite300  
Berwyn PA 19312 US  
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II. The Proposed Anti-Idling Regulations Should Be Amended to Remove Impediments to the Performance of the PWIA's Essential Waste Removal and Disposal Function and Alleviate Undue Hardships that PWIA Members will face under the Current Form of Proposed Regulations As responsible stewards of the environment, the PWIA supports the PADEP's efforts to adopt new regulations that will help prevent the citizenry of Pennsylvania from being exposed to oxides of nitrogen ("NOx"), volatile organic compounds ("VOCs"), and particulate matter that is produced by diesel vehicle emissions. However, without the minor expansion of Existing Exemption #8 and the inclusion of an additional exemption that is specific to the solid waste collection, transportation, and disposal industry, the Proposed Anti-Idling Regulations will: (1) impede the performance of the essential public function of waste removal and disposal in Pennsylvania; and (2) present significant and undue hardship to members of the PWIA who operate fleets of commercial diesel vehicles within the Commonwealth of Pennsylvania. Furthermore, the current form of the Proposed Anti-Idling Regulations is impractical because the impediments to the performance of the essential waste removal and disposal function that are inherent within the proposed regulations will necessarily translate to increased costs for Pennsylvania businesses and residents -- with only marginal gain of NOx, VOC, and particulate emissions reductions.  
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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  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Office: 717-783-8727  
Fax: 717-783-8926  
mtate@state.pa.us