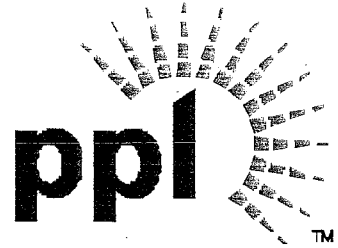


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Reid T. Clemmer, P.E.
Environmental Supervisor

PPL Services Corp.
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610-774-5475 Fax 610-774-5930
rtclemmer@pplweb.com



March 14, 2008

Environmental Quality Board
Rachel Carson State Office Building, 16th Floor
400 Market Street,
Harrisburg, PA 17101-2301

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MAR 14 2008

**Re: Proposed Rulemaking – 25 PA. Code Chapters 121 and 126
Diesel Vehicle Idling; and Auxiliary Power Systems**

ENVIRONMENTAL QUALITY BOARD

Ladies and Gentlemen:

PPL Corporation (PPL) submits the enclosed comments on the Environmental Quality Board's proposed amendments to 25 PA. Code Chapter 121 and 126. Diesel Vehicle Idling; and Auxiliary Power Systems. Also enclosed is a one page summary of those comments to be provided to each member of the Board in the agenda packet distributed prior to the meeting at which the final regulation will be considered. If you have any questions on these comments please call me at (610) 774-5475 or Thomas G. Keller at (610) 774-5029.

Sincerely,

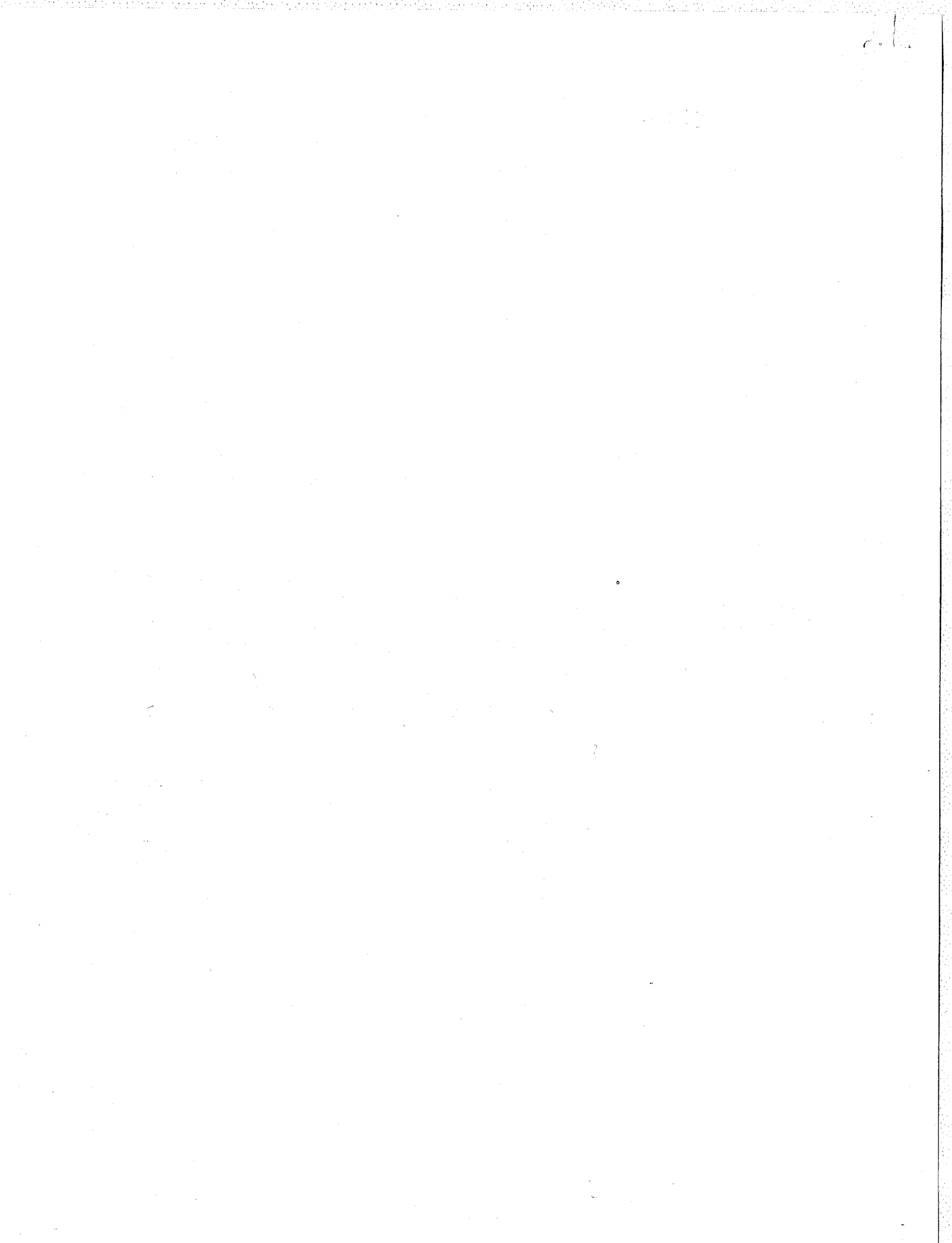
Reid T. Clemmer
Environmental Supervisor
Environmental Management Department

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INDEPENDENT REGULATORY
REVIEW COMMISSION

**PPL Corporation
Comments on Proposed Rulemaking
25 Pa. Code Chapters 121 and 126
Diesel Vehicle Idling and Auxiliary Power Systems**

PPL Corporation and its subsidiaries PPL Electric Utilities and PPL Generation LLC own and operate many diesel powered vehicles that will be subject to the final rule.

With certain exceptions to be discussed later herein, PPL Corporation strongly supports the DEP's rule to limit idling of diesel powered vehicles. We believe that the proposed rule will bring about a significant reduction in emissions needed to attain and maintain the ambient air quality standards for ozone and fine particulate matter.

The electric generation industry in general, and PPL Corporation in particular, have long noted that ozone and fine particulate nonattainment areas in the east lie predominantly along the Interstate 95 corridor. This suggests that mobile sources are the major contributors to this nonattainment situation. Significant emission reductions from mobile sources will be needed to achieve attainment along the Interstate 95 corridor.

Over the years, the electric generating industry and PPL have made major reductions in the NOx emissions that contribute to ozone formation. From 1990 – the year the Clean Air Act was amended and prior to the installation of the low NOx burners that the Act required – until 2006, PPL Corporation has reduced NOx emissions from its Pennsylvania fossil fuel fired steam generating stations by 68%. From 2000, the year prior to installation of Selective Catalytic Reduction Units at PPL's Montour Generating Station, PPL has reduced NOx emissions in 2006 by 24 percent. DEP implementation of EPA's CAIR rule will allocate 15,086 annual NOx emission allowances to PPL's Pennsylvania steam electric stations, which means that PPL must either reduce NOx emissions to 83% below 1990 levels or purchase emission allowances to bring about emission reductions to offset any emissions that PPL may have in excess of its allowance allocation.

With regard to SO2 – a precursor for fine particulate emissions – PPL is installing flue gas desulphurization units that will be operational by the end of 2009 on all of its Pennsylvania generating units. Those flue gas desulphurization units will reduce SO2 emissions to less than 3 percent of today's emissions.

Clearly PPL Corporation is doing its fair share to reduce NOx and SO2 emissions.

The proposed rule contains 11 exemptions that appear to be well thought out. However, there is a need to add two additional exemptions to provide for the needs of PPL Corporation and other companies that engage in similar activities. Those two additional exemptions are:

1) An Exemption to Provide Warm Up for Electric Line Crews Working in Severe Cold Weather.

PPL Electric Utilities, a subsidiary company of PPL Corporation owns and maintains electric transmission and distribution systems that sometimes require repair or maintenance work during periods of severe cold weather, with ambient temperatures sometimes going below 15 degrees Fahrenheit. Under such conditions it is necessary to provide field work crews with an opportunity for periodic warm up periods to provide intermittent relief from the severe cold. The proposed rule includes exemption number 8 which provides exemption "...to prevent a safety or health emergency and not for the purpose of a rest period." We believe that this wording may be interpreted to exclude the necessary warm up periods, and we recommend adding the following exemption:

"When idling is necessary for up to 20 minutes per hour for the safety and comfort of utility workers performing work outdoors when the ambient temperature is less than 20 degrees Fahrenheit."

There is a precedent in Pennsylvania for such a provision in Air Management Regulation IX of the City of Philadelphia Department of Public Health Air Pollution Control Board. That regulation – pertaining to the control of emissions from mobile sources – would allow idling of any vehicle for up to 20 minutes when the ambient temperature is less than 20 degrees Fahrenheit. We believe our proposal will address the needs of electric line crews who have to work in very cold ambient conditions to provide a much-needed public service, especially when their task is responding to power outages during periods of extreme cold.

2) A Limited Exemption to Accommodate Loading and or Unloading Operations.

PPL Generation LLC, a subsidiary company of PPL Corporation, owns, operates and maintains certain facilities which sometimes load materials into diesel vehicles and which at times cannot dispense materials quickly enough to prevent a queue of vehicles waiting to load from forming. When such queues do form, however, vehicles usually remain stationary for relatively short intervals, long enough to fill one vehicle, have it move on and allow the vehicles following in the queue to move forward one space. While a vehicle may idle at any given space in line for less than five minutes, the cumulative idling time at multiple stops in the queue can sometimes exceed five minutes. We believe it is not reasonable to require vehicles waiting in line to shut off their engines repeatedly for short intervals, especially intervals of five minutes or less. To accommodate this situation, we ask that the regulations allow up to the first four trucks in a queue to idle continuously, with trucks extending beyond the fourth in line required to stop idling. It is expected that the fifth truck in the queue would then start up after the four vehicles that are ahead of it have completed loading and driven off and drive immediately to the loading facility. There may be multiple loading facilities at a plant site, and this exemptions should apply to each facility individually. We therefore recommend that the following exemption be added to the proposed regulations:

12
“(12) “When idling is necessary to avoid frequent, repeated start-ups by trucks waiting to load materials. Up to four (4) trucks that have been queued for loading or unloading operations are allowed to idle per facility. The term facility means the material handling process for which the loading or unloading operation takes place. There can be more than one facility at a plant site.”

Thank you for the opportunity to present these comments

PPL Corporation
Comments on Proposed Rulemaking
25 Pa. Code Chapters 121 and 126
Diesel Vehicle Idling and Auxiliary Power Systems
Summary of Comments for EQB

There is a need to add two additional exemptions to provide for the needs of PPL Corporation and other companies that engage in similar activities. Those two additional exemptions are:

1) An Exemption to Provide Warm Up for Electric Line Crews Working in Severe Cold Weather.

PPL Electric Utilities, a subsidiary company of PPL Corporation owns and maintains electric transmission and distribution systems that sometimes require repair or maintenance work during periods of severe cold weather, with ambient temperatures sometimes going below 15 degrees Fahrenheit. Under such conditions it is necessary to provide field work crews with an opportunity for periodic warm up periods to provide intermittent relief from the sever cold. We recommend adding the following exemption:

“When idling is necessary for up to 20 minutes per hour for the safety and comfort of utility workers performing work outdoors when the ambient temperature is less than 20 degrees Fahrenheit.”

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2) A Limited Exemption to Accommodate Loading and or Unloading Operations.

Materials handling processes that load materials into diesel vehicles at times cannot dispense materials quickly enough to prevent a queue of vehicles waiting to load from forming. To accommodate this situation, we ask that the regulations allow up to the first four trucks in a queue to idle continuously, with trucks extending beyond the fourth in line required to stop idling. We therefore recommend that the following exemption be added to the proposed regulations:

“(12) When idling is necessary to avoid frequent, repeated start-ups by trucks waiting to load materials. Up to four (4) trucks that have been queued for loading or unloading operations are allowed to idle per facility. The term facility means the material handling process for which the loading or unloading operation takes place. There can be more than one facility at a plant site.”