



Southern Alliance for
Clean Energy

www.cleanenergy.org

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Ms. Lynn Scarce, Rules Coordinator
Division of Air Resource Management
Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Dear Ms. Scarce,

Please consider the enclosed recommendations from Southern Alliance for Clean Energy on the Florida Department of Environmental Protection's proposed idling rule for heavy-duty diesel engines-Rule 62-285.420. We strongly support the creation of a statewide idling reduction rule and urge you to move forward with its development.

If you have any questions, feel free to contact me at 404-659-5675 or anne@cleanenergy.org.

We look forward to working with you on the development of this rule.

Sincerely,

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Recommendations for the Florida Department of Environmental Protection's Idling Rule
62-285.420

Diesel engines emit a toxic mixture of harmful particles that are known to contribute to many adverse health impacts and to global warming. Numerous studies conclude that particles found in diesel exhaust cause respiratory illness, lung and bladder cancer, heart disease, stroke, and premature death and contribute to asthma attacks.^{1,2} Diesel exhaust contains black carbon, a potent greenhouse gas and accounts for half of all human-caused black carbon in the United States³. Black carbon is twice as potent as carbon dioxide in changing global surface temperatures in the Northern Hemisphere and the Arctic⁴. However, black carbon remains in the atmosphere for a much shorter time frame than carbon dioxide, which could mean that cleaning up black carbon in the near term would result in faster global warming pollution benefits (in weeks, as opposed to decades).

In addition to the human health and climate impacts, idling wastes fuel, increases wear and tear on a vehicle engine and contributes to noise pollution. According to the U.S. Environmental Protection Agency, for every hour a vehicle idles it wastes 0.8 gallons of fuel. It is estimated that heavy-duty trucks idle for as much as 6-8 hour per day over 300 days per year.⁵

Due to these significant human health, climate, and economic impacts, Southern Alliance for Clean Energy offers the following recommendations for the development of a statewide idling rule to reduce emissions from diesel engines. The rule should affect all heavy-duty diesel engines and equipment (on-and off-road vehicles) that operate in Florida.

Idling Limits

Idling limits should be designated as follows:

- (a) At loading/unloading locations. No owner or other person in control of a location where medium-duty or heavy-duty diesel motor vehicles are loaded or unloaded should cause or allow any such vehicle to idle for a period greater than 30 minutes while waiting in a queue at such location to load or unload.
- (b) For highway diesels. No person shall cause or permit any medium duty or heavy-duty diesel motor vehicle to idle for more than 5 minutes in any 60-minute period. Possible exemptions to these limits are listed below.

Exemptions

The idling limits/requirements should not apply for the period or periods where:

¹ Health Effects Institute, Diesel Emissions and Lung Cancer: Epidemiology and Quantitative Risk Assessment, A Special Report of the Institute's Diesel Epidemiology Expert Panel, June 1999.

²U. S. EPA, Health Assessment Document for Diesel Engine Exhaust. 2002. Prepared by the National Center for Environmental Assessment, Washington, DC, for the Office of Transportation and Air Quality; EPA/600/8-90/057F: 1-4. Available from: National Technical Information Service, Springfield, VA; PB2002-107661, and <http://www.epa.gov/ncea>.

³ Bond T. C., D. G. Streets, K. F. Yarber, S. M. Nelson, J. H. Woo, Z. Klimont, in press 2004, A Technology-Based Global Inventory of Black and Organic Carbon Emissions from Combustion, Journal of Geophysical Research.

⁴ Hansen, James and Larissa Nazarenko. Soot climate forcing via snow and ice albedos. Proceedings of the National Academy of Sciences (PNAS), January 13, 2004; vol. 101, no. 2, pp. 423-428.

⁵ U.S. EPA. SmartWay Transport Partnership, Idling Reduction: Frequent Questions <http://www.epa.gov/otaq/smartway/idle-questions.htm>

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- (1) A vehicle idles while forced to remain motionless because of on-highway traffic, an official traffic control device or signal, or at the direction of a law enforcement official;
- (2) A vehicle idles solely to prevent a true safety or health emergency;
- (3) A police, fire, ambulance, public safety, military, other emergency or law enforcement vehicle, or any vehicle being used in an emergency capacity, idles while in an emergency or training mode; this exemption does not apply when idling for cabin comfort;
- (4) The primary propulsion engine idles for maintenance, servicing, repair or diagnostic purposes, but only to the extent that idling is necessary for such activity;
- (5) A vehicle idles as part of a state or federal inspection to verify that all equipment is in good working order, but only to the extent that idling is required as part of the inspection;
- (6) Idling of the primary propulsion engine is necessary to power work-related mechanical or electrical operations other than propulsion (e.g., operating an extension, loading or unloading, mixing or processing cargo, or straight truck refrigeration); this exemption does not apply when idling for cabin comfort or to operate non-essential on-board equipment; and
- (7) An armored vehicle idles when a person remains inside the vehicle to guard the contents, or while the vehicle is being loaded or unloaded.

Use of Auxiliary Power Units

If the verified particulate matter emissions of an auxiliary power unit are less than those of the propulsion engine, then the operation of such an auxiliary power unit in place of idling the propulsion engine of a model year 2006 or earlier diesel vehicle should not be considered idling.

Penalties and Enforcement

During the first year following the effective date of the rule, any person in violation should be given a written warning. Following such one year grace period, an operator of a vehicle that is in violation should be liable to pay a fine of \$250 for each offense; and the registered owner of the motor vehicle, and the owner of the load/unload location, that is in violation should be liable to pay a fine of \$750. Local (police) and state law enforcement personnel (including DEP and DOT personnel) should have the authority and responsibility to enforce these idling limits. One-half of the proceeds of such fines should be deposited to the account of the agency issuing the fine; and one-half of such proceeds should be deposited into a designated Diesel Emissions Reduction Fund that can be used to pay for diesel auxiliary power units, retrofit equipment, or other similar devices to reduce emissions from diesel engines.

Truck Stop Electrification.

Each truck stop in the State having a capacity of twenty-five or more trucks should install truck stop electrification facilities covering at least 80% of its parking spaces that allow diesel trucks to connect to the electrical grid to obtain power to truck on-board components or stationary

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components for heating, cooling and other needs that otherwise would be met by idling the propulsion engines of such trucks.

Rail and Marine

Within one year of the effective date of this rule, DEP should conduct an analysis of idling practices and effects by locomotive and commercial marine diesels; owners and operators of such diesels should provide such information as DEP may request for the purpose of completing such analysis. Within eighteen months of the effective date of this rule, based on such analysis, DEP should promulgate regulations requiring locomotive and commercial marine diesels operating within the State to eliminate nonessential idling to the extent such regulation is not preempted by federal law.

Idling Education

DEP, after consultation with DOT, should create and implement a plan to:

- (1) Provide information to diesel vehicle operators and owners of the idle reduction requirements, the economic and environmental benefits of idle reduction, and the techniques and technologies available to reduce unnecessary idling; and
- (2) Provide information and training to local and state enforcement personnel concerning these idle reduction requirements and their effective monitoring and enforcement.

In conclusion, limiting idling will provide multiple benefits to Florida and the companies, drivers, and citizens that are often exposed to exhaust from these engines. Limiting idling provides many economic benefits including fuel savings, reduced vehicle maintenance, and it can extend the life of an engine. Further, reducing idling will reduce the impacts on human health and the climate.