

Environment and Human Health, Inc.
1191 Ridge Road
North Haven, Connecticut 06473
Phone (203) 248-6582 **Fax (203) 288-7571**

**RAISED BILL No. S.B. 792 AN ACT PROHIBITING THE IDLING OF
MOTOR VEHICLES.**

**Chairs Senator Ed Meyer, Representative Richard Roy, and Members
of the Environment Committee:**

My name is Nancy Alderman. I am President of Environment and Human Health, Inc. a non-profit organization comprised of nine members who are physicians and public health professionals dedicated to protecting human health from environmental harms.

Environment and Human Health, Inc., is in strong support of Bill 792. This Bill seeks to copy what already exists in the CT Department of Environmental Protections' (CT DEP) "NO IDLING" regulations of 22a-174-18, only this Bill has additional exemptions as it moves the CT DEP regulation into the motor vehicle statutes. This is exactly what the CT Legislature did in 2002 when it moved the School Bus "No Idling" DEP regulations into Motor Vehicles. It has had a tremendous impact on stopping school buses from unnecessary idling and we are hopeful this Bill will do the same thing for cars, buses and trucks. It has enough exemptions to protect all those cases where idling is necessary.

The CT DEP has thought this issue important enough to created regulations that deal with the unnecessary idling of all cars and trucks in its own regulations. However, the CT DEP would be the first to say, that although the regulations are very good one, it is very hard, if not impossible, to enforce as a DEP regulation and needs to be moved over to motor vehicles

This is because, as a CT DEP regulation, the DEP has to first receive a complaint about a particular idling vehicle - then the DEP has to arrange an inspection, which is usually the following day and by that time the idling vehicle has long gone. To be effective, this regulation needs to be moved into the motor vehicle regulations so that it can be enforced by the police, just like the legislature did in 2002 for the "no idling" school bus DEP regulation that the legislature copied into the CT motor vehicle laws.

Because this Bill basically copies the CT DEP regulation - with additional exemptions, this Bill is well thought-out and well written. It has all the exemptions needed to allow for necessary idling, such as using a drive-in window, auxiliary equipment, exemptions for overnight truckers, and many more.

The public is quite unaware of their idling habits. They leave their motors running when they go into the cleaners, the drug stores, Dunkin Doughnuts, grocery stores and so on. The public is also unaware of the harmful effects of both diesel and car exhaust - both of which have serious health effects. Both have components that are carcinogenic, both contribute to ozone levels which effects lung function, diesel exhaust exacerbates asthma, which in this state affects almost 10% of our children.

EPA estimates that about 40% of air toxic emissions in the U.S. come from mobile sources. People need to better understand the health effects of vehicle exhaust so that they can better protect their health and the health of their families.

The quickest and cheapest way to get immediate vehicle exhaust reductions is to ban the **unnecessary** idling of cars, buses and trucks. As well, a side benefit will be reducing carbon dioxide emissions which are the main component of greenhouse gases that are contributing to global warming.

The school bus "No Idling" law has done a tremendous job in reducing school bus idling and now we need to do the same thing for cars and trucks.

The issue that the police cannot prioritize their time enforcing a vehicle idling law is not reason not to make the CT DEP "No Idling" regulation the law under the motor vehicle statutes - which this Bill will do. The police do not spend their time enforcing the school bus idling law - yet that law is working. Parents, teachers, and school administrators enforce the law and if bus drivers don't listen, then they can call police --- because it is "The Law".

This is exactly what we need to do for all vehicles. Prohibiting the **unnecessary** idling of cars, buses and trucks is the quickest and cheapest way to reduce vehicle emissions -- and it will be better for the environment, important for global warming, it will conserve fossil fuel and better protect human health - all at the same time.

Thank You,

Nancy Alderman, President
Environment and Human Health, Inc.
2009 Legislative Session

QUESTIONS AND ANSWERS ABOUT WHAT THE IDLING BILL WILL MEAN

1. Can I idle my diesel truck while I'm sleeping in it?

Currently, idling is allowed for heating or air-conditioning a sleeper cab while the driver or another driver is sleeping or resting in the sleeper berth in a non-residential area. An enforcement officer may need to confirm that there is someone sleeping in the sleeper berth.

Drivers and trucking companies are encouraged to use alternatives to engine idling for temperature control that will save fuel and maintenance costs such as alternate power units or plug-in power.

2. How long am I allowed to idle to warm up my diesel engine?

When the ambient temperature is below 25 degrees Fahrenheit, a motor vehicle may idle for 15 consecutive minutes when the vehicle has been stopped for 3 or more hours. Otherwise, idling is limited to 3 minutes. However, most diesel engines take 3 minutes or less to warm up (consult the engine manufacturer's recommendations). Limiting idling will save fuel and money.

3. Are school buses subject to the 3 minute idling limit?

Yes, except for when they are sitting in traffic. Because children are especially vulnerable to the effects of diesel exhaust, drivers should turn off engines even when loading and unloading students. Diesel exhaust from queuing school buses often enters a school's ventilation system where the entire school population is exposed.

4. Are there exceptions to allow idling for more than 3 minutes?

Yes. Diesel vehicles whose primary power source (engine) is necessary for operation of mechanical devices such as refrigerated trailers commonly called reefers, hydraulic lift gate pumps, air leveling equipment, cherry-pickers, etc. Some turbo-diesel engines, especially newer models, require approximately 3 to 5 minutes of idling to cool down the engine and avoid damage. These vehicles will be allowed to idle for a length of time necessary for cooling as determined by the engine manufacturer and set with automatic timers.

In addition to these situations, armored trucks are exempt from idling requirements for several reasons. In order to assure the security of the cargo and drivers, these vehicles' engines must be on at all times. The windows of armored vehicles cannot be rolled down, which results in temperatures inside the vehicle that can be harmful to occupants. Most armored vehicle companies require that one person be in these vehicles at all times and this passenger would be exposed to dangerous temperatures.

Vehicles that are transporting live animals that need to be temperature controlled would be exempt from the 3 minute idling requirement.

When the temperature is below 20 degrees Fahrenheit

Vehicles that serve as portable service operations, where customers enter the vehicles to receive services or make purchases, are exempt from the 3 minute idling requirement only if the engine must be on to provide electricity, air conditioning or heat to the service portion of the vehicle. This would include vehicles like libraries on wheels, bloodmobiles and Snap-On Tools trucks.

5. Will idling my asphalt truck to warm the asphalt qualify for the exemption at 14.3(b)2?

The exemption located at N.J.A.C. 7:27-14.3(b)2 is applicable only to those vehicles whose primary diesel engine is used for operations, other than propulsion, passenger compartment heating and passenger compartment air conditioning, that are specifically designed by the truck manufacturer. Asphalt trucks are designed to have a separate power source that provides the heat necessary to treat the asphalt, so asphalt trucks that use exhaust gas to "warm" the asphalt in the bed of the truck do not qualify for this exemption.

6. Can I idle while my diesel vehicle is being repaired?

Yes, as long as someone is actively working on the vehicle and the vehicle needs to be running to ensure effective diagnosis and repair.

7. If my vehicle is waiting to be inspected, am I allowed to idle?

Yes, vehicles can idle while being inspected or waiting to be inspected by a State or Federal motor vehicle inspector when the vehicle needs to be running to ensure effective diagnosis and repair. However, if you are waiting in line, shutting off the engine will save fuel and money as well as benefit the environment.

8. Are Alternate Power Units (APUs) subject to idling regulations?

APUs are devices attached to diesel vehicles that can power the vehicle's heating and air conditioning systems without the need to have the engine turned on. These devices allow truck drivers to sleep comfortably without the noise, smell and health effects of diesel exhaust. In addition, APUs are cost-effective and often pay for themselves within a year or two of installation due to reduced fuel costs and less frequent maintenance. At the current time, APUs are not subject to idling restrictions. Information on APUs is available from USEPA at www.epa.gov/otaq/smartway/idlingtechnologies.htm.

9. What if my vehicle is stuck in traffic for more than 3 minutes?

Motor vehicles stopped in traffic are exempt from the 3 minute idling limit. However, if the traffic is not moving, shutting off the engine will save fuel and money as well as benefit the environment.

10. Are emergency vehicles allowed to idle?

By their nature, emergency vehicles such as fire, police, ambulances or public utility trucks may need to keep engines running to operate emergency equipment when they are engaged in the process of performing emergency services. They are exempt from idling restrictions, but only when actively being used for emergency services.

11. Are regular gasoline-powered vehicles subject to idling restrictions?

Yes, gasoline-powered motor vehicles are subject to similar idling restrictions including a 3 minute limit on idling. However, diesel vehicles emit much more fine particulate matter, commonly called soot, than do gasoline-powered vehicles and they will continue to be the subject of increased enforcement oversight.

12. Who can enforce the regulations besides DEP?

The State and local police departments can enforce the standard on public roadways.

13. Will reducing idling really make a significant difference in reducing soot?

According to the EPA, the U.S. Department of Energy and other organizations, the average long-haul truck idles at least 1,830 hours per year, and, in the process, uses \$2,200 of unnecessary fuel and emits 17 tons of carbon dioxide, 10 pounds of fine particles and 615 pounds of nitrogen oxides every year. Reducing idling will lower maintenance costs on each vehicle, save fuel and protect public health and air quality.

14. Wouldn't the continual shutting off and turning on of diesel engines actually damage the engine and emit more soot than idling?

Idling an engine for more than about 10 seconds actually uses more fuel than if the engine had been turned off. It is more efficient to turn an engine off if it will be stopped for more than 10 seconds. Frequent restarts of an engine will not have a negative impact on engine components.

15. Isn't it bad to drive a cold engine if it hasn't been warmed up?

Electronically controlled engines need no more than about 30 seconds to warm up. Driving a vehicle cuts warm-up times in half. The best way to warm up an engine is by driving it, while avoiding rapid acceleration and high speeds for approximately the first four miles in cold weather.