

**Oregon Department of Environmental Quality
Draft Idling Recommendations**

DEQ Recommendations	General Rationale	Study Group Comments
Applicability:		
<ul style="list-style-type: none"> On-highway diesel-fueled commercial motor vehicles 	<ul style="list-style-type: none"> Majority of idling emissions impacts & fuel consumption are from long duration idling diesel vehicles 2006 and older engines: Diesels emit more harmful emissions than gasoline engines 	<ul style="list-style-type: none"> HB 2186 refers specifically to “parked” commercial vehicles Make it fuel neutral
<ul style="list-style-type: none"> GVW rating > 10,000 lbs. 	<ul style="list-style-type: none"> Model law recommends a minimum of 8,500 – 10,000 lbs. Most other states and jurisdictions, including California, have 10,000 or 14,000 lb. minimum 10,000 – 26,000 lb. vehicles potentially a large source of workday idling emissions 	<ul style="list-style-type: none"> 10,000 lbs. too low – begin at 26,000 Focus on vehicles 10,000 lbs. and above Carefully assess inclusion of 10,000 to 26,000 lb. vehicles
<ul style="list-style-type: none"> Load or unload locations (facility owners and operators) 	<ul style="list-style-type: none"> Logistics problems at load/un-load locations may create long waits Creates a mutual responsibility between drivers and facility owners to reduce truck idling 	
<p>General Requirement for Vehicles: five minutes in any continuous 60-minute period:</p>	<ul style="list-style-type: none"> Consistency: Model Law recommendation and ~50% of the other states and jurisdictions in U.S., including California, have 5 minute limits Some exemptions require no more than 5 minutes of idling to complete: warm or cool engine in moderate weather; pre-trip inspection – air break pressure test 	
<p>General Requirement for Load / Unload Locations: 30 minutes while waiting to load or unload:</p>	<ul style="list-style-type: none"> Creates a mutual responsibility between drivers and facility owners to reduce truck idling Logistics problems at load/un-load locations may create long waits 	
Exemptions:		
<ul style="list-style-type: none"> Emergency & law enforcement 	<ul style="list-style-type: none"> Idling may be necessary for emergency or training mode 	
<ul style="list-style-type: none"> On-highway traffic conditions (Queuing off-hwy. at distribution center <u>not</u> exempt) 	<ul style="list-style-type: none"> Situations outside driver’s control 	

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Exemptions (Continued): <ul style="list-style-type: none"> Prevent safety or health emergency (Doesn't apply to rest period) 	<ul style="list-style-type: none"> Allows idling for safe operation during adverse weather 	
<ul style="list-style-type: none"> Power takeoff & auxiliary equipment (Doesn't apply when idling for cabin comfort or to operate non-essential on-board equipment) 	<ul style="list-style-type: none"> To power work-related mechanical or electrical operations other than propulsion 	
<ul style="list-style-type: none"> Vehicle safety inspection Maintenance, service, repair, diagnostic, mechanical difficulties, including DPF regeneration 	<ul style="list-style-type: none"> Allows idling when required/necessary to complete these activities 	
<ul style="list-style-type: none"> Armored vehicle 	<ul style="list-style-type: none"> Maintains safety when person remains inside to guard contents or load/unload vehicle 	
Conditional Exemptions (Expire after 3 years):		
<ul style="list-style-type: none"> Passenger bus, 15 minutes in any 60 minute period 	<ul style="list-style-type: none"> To warm/cool non-driver passengers while on-board 	
<ul style="list-style-type: none"> Occupied vehicle w/sleeper, or a vehicle waiting to load/unload and outside temperature is <32°F or >75°F (For rest, sleep, and load/unload periods only) 	<ul style="list-style-type: none"> Recognizes need for heating & cooling to adequately rest or sleep during adverse weather Logistics problems at load/un-load locations may create long waits 	<ul style="list-style-type: none"> Temperature range of <32°F or >75°F is not a comfortable range for drivers
Auxiliary Power Units (not an idling engine):		
<ul style="list-style-type: none"> Model year 2006 or older vehicles – APU's permitted 	<ul style="list-style-type: none"> Allow use of APUs instead of main engine idling Emissions of typical APU less than model year 2006 or older diesel vehicle 	
<ul style="list-style-type: none"> 2007 & subsequent model year vehicle - 3 years after effective date of rule, no Auxiliary Power Systems unless <ol style="list-style-type: none"> equipped w/Level 3 particulate matter control exhaust routed to vehicle exhaust pipe, upstream of after treatment device 	<ul style="list-style-type: none"> APUs may emit more particulates than 2007 and subsequent model year engines 	

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<p>Compliance by DEQ & Police:</p> <p>Focus on education and outreach campaign in early years</p> <p>Require anti-idling signage and complaint response</p> <p>Applies to:</p> <ul style="list-style-type: none"> • vehicle owner and/or operator • load/unload location owner 	<ul style="list-style-type: none"> • Increases opportunity for compliance • Creates mutual responsibility for idling reduction 	<ul style="list-style-type: none"> • Prefer national requirements that are uniformly enforced to create level playing field • Ask Police if they are willing to enforce idling regulation • Will be dealing with interstate commerce – easier to enforce on businesses than drivers • Understand needs and impacts on different classes of fleets • Would do nothing to influence owner /operator contract - liability • Fine negligent part (owner or driver) • Complex law and enforcement • Creates pockets of enforcement w/hardship on some • Focus less on enforcement and more on voluntary compliance
<p>Compliance: civil and criminal:</p> <p>1st violation – warning 2nd and subsequent violations - \$fine</p>	<p><u>Warnings:</u> Focus on Outreach and education</p> <ul style="list-style-type: none"> • State beginning to enforce new idling law • Opportunity to educate about idling law and any state financing program • owners/operators make honest mistakes <p><u>Fines:</u> Focuses on frequency and severity in setting penalties for offenders</p>	<ul style="list-style-type: none"> • Level of penalty will impact owner/operator differently • Important to distinguish between local and long-haul • Doesn't understand purpose of warning – drivers should be educated on law by fleet owners

Please mail, e-mail or fax your comments to:



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