

*Presentation To
National Idling Reduction Planning Conference
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Obtaining Emissions Reductions Through Reduced Idling: Are Regulations The Best Option?

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Engine Manufacturers Association

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Engine Manufacturers Association

- Member Trade Association
Representing Manufacturers of
Internal Combustion Engines
- Represent Industry on Legislative
and Regulatory Matters With
Federal, State, Local Government
- Emphasis on Environmental and
Emissions Issues

EMA Members

Briggs & Stratton

Caterpillar

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DaimlerChrysler

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Tecumseh

Volkswagen

Volvo Powertrain

Waukesha Engine, Dresser

Yamaha Motor

Yanmar Company

EMA Presentation Theme

- Quote From Famous British Philosopher, Monty Python:

**“AND NOW, SOMETHING
COMPLETELY DIFFERENT”**

Presentation Outline

- Engine Manufacturers' Approach to Idling
- Key Idling Reduction Issues
- Concerns With Idling Mandates
- A Voluntary Approach
- Regulatory Considerations

EMA Approach

- EMA supports efforts to reduce unnecessary idling
- Reduced idling has many benefits
 - Fuel/energy savings
 - Reduced emissions
 - Extends engine service life
 - Reduced maintenance
 - Reduced noise

EMA Approach

- Engine manufacturers provide technology options that encourage and enable reduced idling
 - Automatic shutdowns
 - Automatic start/stop systems
- Benefits of reduced idling need to be balanced against legitimate needs for idling
- In developing idling reduction efforts, several key issues should be considered

Key Idling Reduction Issues

- Problem identification
 - Is idling the real problem?
- Air quality benefits
 - What are true air quality benefits?
- Legitimate idling needs
 - What idling needs to continue?
 - What are covered applications?
- Best options
 - Voluntary or mandatory approach?
- Benefits vs. costs
 - Will benefits outweigh costs

State and Local Idling Mandates

- What's wrong with regulatory mandates?
 - Inflexibility
 - High costs to regulated community
 - High administrative/enforcement costs
 - May establish new de facto emissions standards
 - Enforcement/fairness problems

Patchwork of Requirements

- Patchwork of State/Local Regulations
 - ~ 20 State/Local idling regulations
 - ~ 8 States with pending legislation
 - Requirements vary widely among jurisdictions
 - No idling while stationary – HI, IL
 - 2 minutes – PA
 - 3 minutes – NJ, NYC, CT, DC
 - 5 minutes – AZ, MD, MA, NY, ST Paul, TX (Apr-Oct)
 - 15 minutes – Atlanta, Salt Lake, NV
 - 42 Exemptions Categories

SOURCE: ATA Website

Patchwork of Requirements

- Current proliferation of different idling mandates creates incredible compliance issues for manufacturers, operators and states
 - What are requirements?
 - Interstate/Intrastate differences
 - Different hardware requirements/settings
 - Impossible to enforce
- Effectiveness of mandates must be questioned

Voluntary Programs – A Better Approach

- EMA supports voluntary education and outreach programs to reduce idling
- Voluntary programs provide many advantages
 - Flexibility
 - Targeted to maximize emissions reductions
 - Cost effective for Operators
 - Avoids Enforcement Costs for States
 - Operator friendly
 - Not another regulation

Why Voluntary Idling Reduction Should Work

- Reduced idling saves owners and operators money
- Operators who reduce idling will have a competitive business advantage
- Demonstrated return on investment
- Arguments that reduced idling is good for environment and the bottom line

Voluntary Idling Programs

- Joint Industry/Government Efforts
- Education on Benefits to Operators
- Incentives/Rewards Program
- Information and Decision Tools

Regulatory Considerations

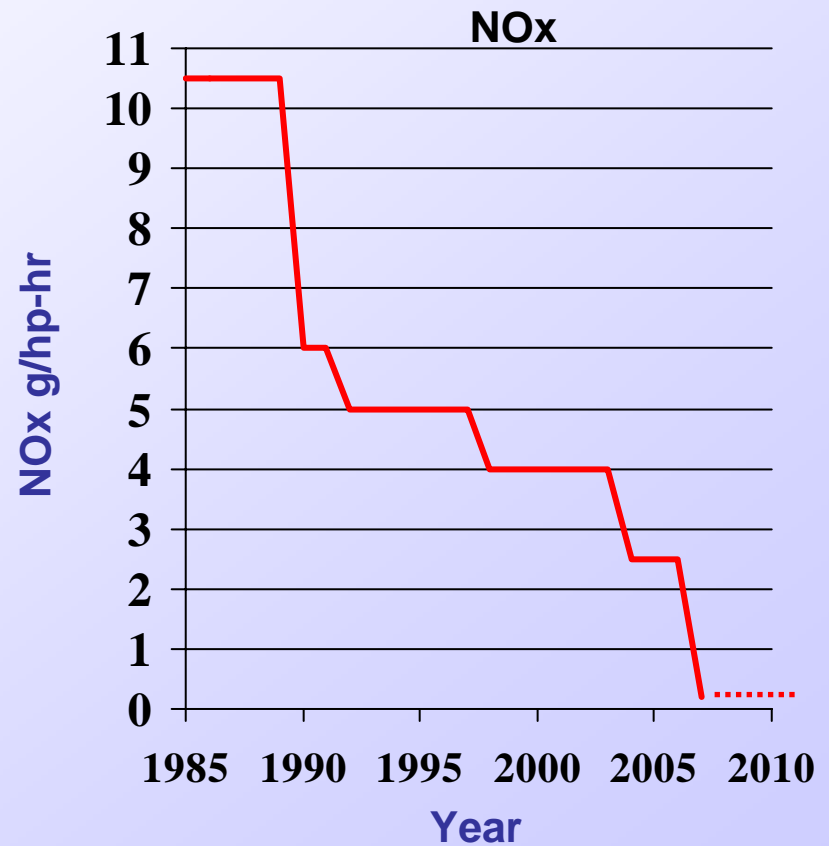
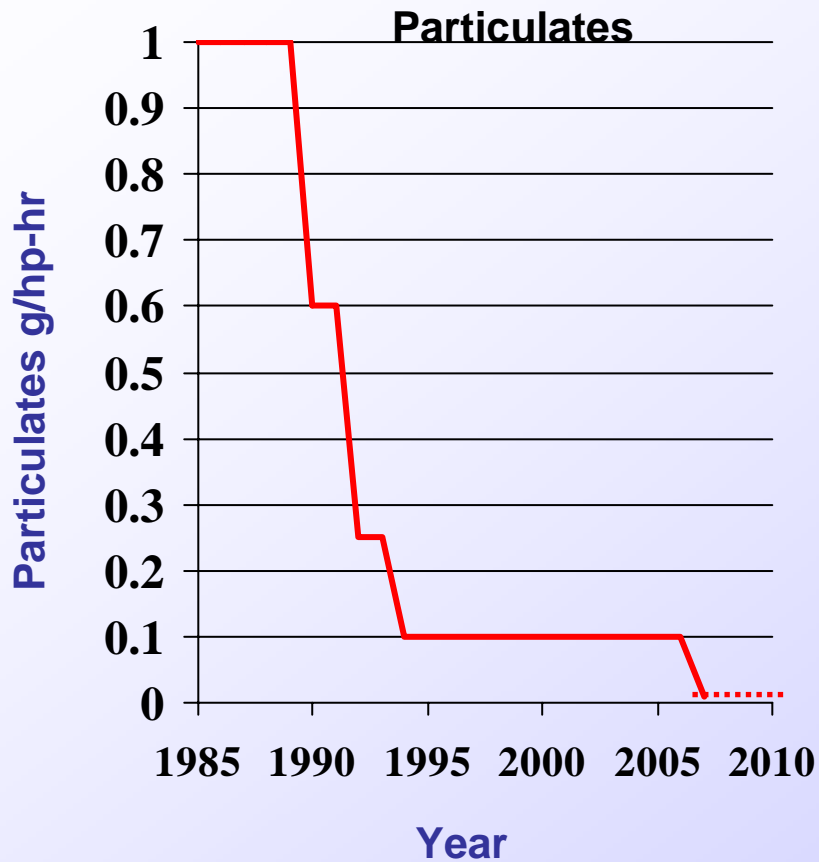
- If States/Municipalities seek to adopt mandatory regulations, several issues should be considered

Regulatory Considerations

- Identify true air quality benefits
 - Proper Inventory Analysis
 - Current emissions inventories already include idle time
 - New heavy duty engines starting in 2007 will have greatly reduced emissions

On Highway Truck Engines

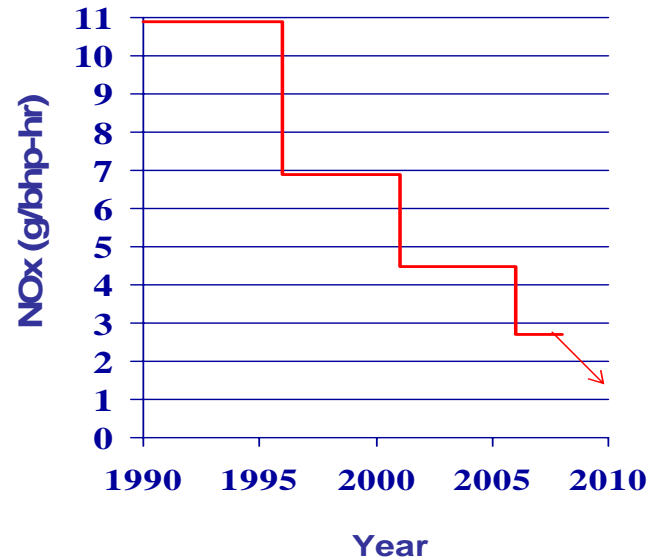
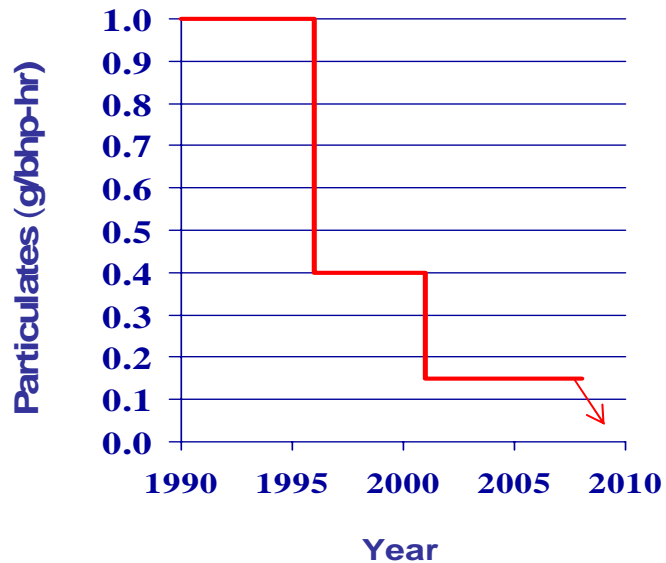
EPA Diesel Engine Emission Standards



Nonroad Engine Emissions

Nonroad Engines

EPA Diesel Engine Emission Standards
e.g, 302-602 hp



Regulatory Considerations

- State and local idling requirements cannot establish emissions standards for new engines/vehicles
 - Clean Air Act preempts states and political subdivisions from establishing mobile source emissions standards
 - National standards key to manufacturer efforts to cost-effectively reduce emissions

Regulatory Considerations

- Anti-idling regulations/ordinances must strike proper balance and allow for necessary exemptions
 - Vehicles/equipment still has to perform its function
 - There are legitimate needs for idling

Regulatory Considerations

- Focus requirements on segment of existing fleet that will result in greatest emissions benefits
 - Older vehicles have highest emissions factors
 - Post 2007 vehicles have near zero emissions levels

Diesel Engine PM Emissions Standards

- New Diesel Onroad Engines

1980s	> 1.0 g
1988	0.6 g
1994	0.1 g
2007	0.01 g
- New Diesel Nonroad Engines

1980s	>1.0 g
1996	0.4 g
2003	0.15 g
2011	0.01 g

Regulatory Considerations

- Is idling reduction the best solution for the problem you want to solve?
 - May be more effective to focus on
 - Traffic congestion
 - Relieving bottlenecks
 - Facility operations management

Recommended Approach To Idling Reduction

- Implement voluntary program with cooperation of business community
- Make education on the benefits of reduced idling the focus of your voluntary program
- Only apply mandates when
 - There is demonstrated air quality need
 - Voluntary approach has failed
 - Requirements are feasible and enforceable