

Guidance for Implementation of Nonroad Idling Rule

Frequently Asked Questions about Idling

Why is it important to reduce idling?

Unnecessary idling results in the emission of many air pollutants that are harmful to human health, wastes fuel, and increased maintenance requirements for all types of vehicles. Modern diesel equipment does not need to idle for more than [3-5] minutes to warm up, unless specifically instructed otherwise by the equipment manufacturer.

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

Idling of 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.¹

Isn't it bad to operate a cold engine if it hasn't been warmed up?

Electronically controlled engines need no more than about 30 seconds to warm up. Consult vehicle/equipment operating manual to determine necessary warm-up times. Running equipment cuts warm-up times in half.

Summary of Nonroad Idling Regulation

[STATE AQ DEPT] places a limit on unnecessary idling of nonroad diesel equipment as the result of the adoption of [REG #]. The regulation states: "No person, entity, owner, or operator shall cause or allow the idling of Nonroad diesel equipment under its control or on its property for more than [3-5] consecutive minutes." This limit applies to all off-road diesel equipment subject to the regulation, unless the piece of equipment is exempt or idling for specific circumstances defined in the regulation. The idling limits are effective and enforceable as of [EFFECTIVE DATE], when the regulation became effective under [STATE] law. This document provides additional information on the idling limits.

Who may be held responsible for idling violations?

- Person, entity, owner, or operator of a property or location where the equipment is operated.
- Owners and operators of the equipment.

¹ Taylor, G. W. (2003). *Review of the Incidence, Energy Use and Costs of Passenger Vehicle Idling*. Office of Energy Efficiency, Natural Resources Canada.

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- If the equipment is leased, the lessee of the equipment.
- The permit holder for the activity for which the equipment is being operated.

Can multiple parties be held responsible for an idling violation?

Parties are jointly and severally liable for violations, meaning multiple parties can be held liable for the same violation.

What types of equipment are exempt from the regulation?

- Locomotives with genset or conventional engines
- Marine engines
- Recreational vehicles
- Farming equipment
- Military equipment when it is being used during training exercises, emergency or public safety situations
- Equipment that is not being operated for compensation (e.g. a homeowner using his own backhoe to dig out a pool on his/her property).

When is idling for more than [3-5] minutes allowed?

The purpose of the idling limitations is to prevent idling when it is not necessary, and is not intended to limit the functions of a vehicle or business. A large percentage of idling is unnecessary and is the result of personal habit. This unnecessary idling can be eliminated and result in significant fuel savings and reduced wear and tear on equipment.

The regulation explicitly grants exemptions to the idling limit for the following cases, [and will consider other circumstances on a case-by-case basis?]:

- Idling is allowed when necessary to meet specifications of the manufacturer's operating manual or other applicable technical document.

Note: liable parties are responsible for providing the manufacturer's operating manual to demonstrate the need for longer idling times.

- Idling is allowed to ensure the safe operation of the equipment.

Includes idling for defogging/deicing, operating safety lights, and/or to verifying that the equipment is in good working order.

- Idling is allowed to ensure the health and safety of the equipment operators

Enforcement personnel will have the discretion to make exceptions to the idling limitations when idling is necessary to provide heating or air conditioning to ensure the health and safety of the operators. When temperatures are within

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25°F & 85°F no exemptions will be allowed. Additionally, units with installed APUs will not be exempted at any temperature.

- Idling is allowed for testing, servicing, repairing, or diagnostic purposes, including regeneration of a diesel particulate filter.

*Note: The exemption for diesel particulate filters does not apply to equipment that uses a filter that does **not** require regeneration in order to function properly.*

- Idling is allowed as part of a prescribed mechanical or electrical operation.

Examples: operating a crane, operating a cement mixer when necessary to provide concrete agitation, cherry picker, fuel pump operation, powering hydraulic systems, boom lift or transporting property while the property is being loaded and unloaded. Asphalt trucks that have a separate power source that provides the heat necessary to treat the asphalt do not qualify for this exemption (i.e., asphalt trucks that use exhaust gas to "warm" the asphalt in the bed of the truck are not exempt from the idling limits. Idling is allowed for less than fifteen (15) minutes when queuing.

This does not include the time an operator may wait motionless in line in anticipation of the start of a workday or opening of a location where work or a service will be performed.

- Idling is allowed when waiting for a state or federal inspection to verify that all equipment is in good working order, if idling is required as part of the inspection.
- Idling is allowed when a vehicles is being used for emergencies or the public safety, such as utility service restoration that requires emergency warning lights or other mechanical functions..

Is idling allowed for onroad vehicles, generators or Tier 4 engines?

The idling limitations were put into effect to limit the levels of pollution produced by preventing idling when it is not necessary. The regulation does not grant exemptions for the following cases:

- Tier 4 engines are subject to the [3-5] minute idling limit. Although Tier 4 engines are cleaner, there is no reason to idle **any** engine unnecessarily.
- Stationary generators may need air permits pursuant to [other state regulation] and their operation is not covered by this regulation.

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- Idling of onroad engines powered by fuels other than diesel is covered under [other state regulation].
- Idling of onroad diesel engines while:
 - traveling to a site is covered under [other state regulation]
 - working on a site is covered under [this regulation | other state regulation]

Is a company idling policy necessary?

While the regulation does not require a written idling policy, [STATE AQ DEPT] does recommend that owners and operators of nonroad diesel equipment have a written idling policy in order to keep employees informed about the rule. By having a written company idling policy it will be easier for a company to ensure that employees do not violate anti-idling regulations.

How Can Individual Pieces Of Nonroad Equipment Be Identified?

Information on how to identify types of nonroad diesel equipment or locate serial numbers on nonroad diesel equipment can be found on EPA's website:

<http://epa.gov/cleandiesel/documents/420b10025.pdf>.