



DELAWARE SOLID WASTE AUTHORITY

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January 20, 2011

Via Electronic Transmission: jjakuta@otcair.org

Mr. Joseph Jakuta
Hall of the States
444 North Capitol Street NW
Suite 638
Washington, DC 20001

Dear Mr. Jakuta:

RE: Comments to the Ozone Transport Commission's Model Rule for Nonroad Diesel Equipment Anti-Idling

The Delaware Solid Waste Authority (DSWA) is submitting the following comments to the Ozone Transport Commission's (OTC) Model Rule for Nonroad Diesel Equipment Anti-Idling (herein referred to as the "Model Rule"). DSWA appreciates the opportunity to comment and looks forward to working with OTC to assist in any way possible.

DSWA was created in 1975 by the General Assembly of the State of Delaware. It is DSWA's mission to define, develop, and implement cost-effective plans and programs for solid waste management which best serve Delaware and protect our public health and the environment. Since its inception, DSWA has been an active participant in the Solid Waste Association of North America (SWANA) and leader in developing innovative technology in the field of solid waste management. DSWA owns and operates three active and one closed landfill in the State of Delaware.

The Model Rule states, in section Env-A XXX.05, that nonroad diesel engines shall not idle for more than, "three (3)/five (5) consecutive minutes". It is unclear which time period OTC is recommending as the idling limit here. DSWA recommends that five minutes is a more reasonable time frame than three minutes. Three minutes is too restrictive.

Section Env-A XXX.06 (3) allows idling for up to fifteen minutes if the vehicle is queuing. DSWA is concerned about how the Model Rule may affect the operation of solid waste compactors. Compactors are large pieces of equipment that are used to push solid waste into place and to increase the density of the solid waste as it is landfilled. Compactors often idle while solid waste is dumped by the trash trucks. It is necessary for the compactors to wait for solid waste to accumulate before it is

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pushed and compacted. This allows the trash trucks to have adequate space to dump the waste and maneuver safely. DSWA is concerned that unnecessary moving of the compactors (to avoid idling) will risk the safety of other vehicles, personnel in the area, and landfill gas infrastructure. It would not be practicable for the compactors to be turned off because the equipment is occupied and the operator should remain in the equipment for safety reasons. Inside the equipment, the operator needs the heat/air conditioning during most days. DSWA suggests the following revision to section Env-A XXX.06 (3) to allow compactors to idle for up to 15 minutes (the change is shown in bold italics for clarity):

Idling for less than fifteen (15) minutes when queuing, i.e., when nonroad diesel equipment, situated in a queue ***or whose work is dependant on a queue of other vehicles***, must intermittently move forward to perform work or a service. 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

If you have any questions or comments to the information provided herein please do not hesitate to contact me (adm@dswa.com, 302.764.5385).

Yours Truly,



Angela D. Marconi, P.E.

Cherry Island Landfill Gas Manager

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