



California Environmental Protection Agency  
Air Resource Board  
1001 I Street  
Sacramento, CA 95814

RE: PROPOSED AMENDMENTS TO THE AIRBORNE TOXIC CONTROL MEASURE TO LIMIT  
DIESEL-FUELED COMMERCIAL MOTOR VEHICLE IDLING

Dear Sirs and Madams,

The proposed regulations would exempt ambulances from the idle control regulations while in the course of providing services for which the vehicle is designed. No definition is included for the term “providing services”.

Ambulances are known to idle for extended periods of time. This idling may occur at the site of an emergency while attending to the emergency, or it may occur at hospital emergency departments after discharging patients or while waiting to pick-up patients for transport and the like.

The technical justification for ambulance idling is threefold: 1) to maintain cabin temperature within a specified range to maintain drug efficacy and patient transport requirements, 2) avoid engine start concerns, and 3) provide power to maintain vehicle start battery and to operate and maintain battery state of charge of onboard medical equipment. While these are valid needs for energy, they are not a justification for uncontrolled engine idling.

A vehicle idling on-scene attending to victims meets a common sense interpretation of ‘providing services’, but does idling after patient discharge or waiting for patient transport meet this definition? A valid alternative to engine idling in these situations is available and has been deployed at several hospitals in the Northeast<sup>1</sup>. This technology provides the required energy to meet the technical needs without engine idling and the attendant emissions of concern. This alternative is in the form of a kiosk designed to provide the energy necessary to maintain design conditions within the cabin, maintain the engine start battery and maintain

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<sup>1</sup> See for example attached National Idling Reduction News March, 2012 newsletter and December 10, 2013 The Laconia Sun Daily article. With in Vermont and New Hampshire Idle Reduction Technology has been installed at five hospitals.

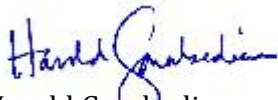
and support operation of onboard medical equipment. This technology has been deployed at hospitals in Vermont and New Hampshire, and proposals are underway in Indiana and in association with the Southeast Diesel Collaborative.

Section 2485 would benefit from a definition of 'providing service', and a definition that excluded ambulance idling while on hospital campuses advances the objectives of the airborne toxic control measures. Hospital campuses have some unique considerations when developing these standards of performance. Ambulances idling at these locations are releasing their toxic contaminants in close proximity to sensitive individuals and there are cases where engine exhaust becomes entrained into the buildings air intake systems or infiltrates the building by virtue of the constant opening and closing of emergency room doors leading to a build-up on contaminants within a building and a greater exposure to these unhealthful contaminants. The alternative identified results in fewer emissions (both toxic and greenhouse gases), less cost overall and more efficient use of energy.

I hope that you will take these comments under consideration in any meetings, hearing and deliberations you conduct on the proposed amendments.

Thank you for your time and consideration.

Sincerely



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Excerpt from March 2012 National Idling Reduction News  
The Laconia Sun Daily article published 10 December 2013  
Power Point file, MediDock Ambulance Idle Elimination Technology