

# Diesel Idling Emission Prevention Plan

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The purpose of this plan is to outline the measures that Heron Lake BioEnergy will take to limit the emissions associated with idling diesel vehicles delivering corn to the facility.

**Purpose.** This plan seeks to reduce driver, staff and visitor exposure to diesel exhaust particulate matter by limiting unnecessary idling of vehicles waiting to unload corn.

**Applicability and Assumptions.** In general, the receiving operations are sized and set up to accommodate a typical flow of trucks, where the approximate time from scale house to scale house (8 to 10 minutes) is equal to the arrival rate of trucks, and trucks are not waiting on site to unload corn. This plan applies year-round, but is most likely to be implemented during high-volume seasonal (early fall) times, when up to 250 trucks per day are received at the facility for delivery of corn; and daily in the early morning hours when the receiving activities first begin and truck volume is higher. It is during those times that vehicles are more likely to be on-site for periods of up to forty-five minutes (including unloading time), and are likely to spend periods of fifteen minutes or more waiting to unload.

This plan is based on the following pre-operation assumptions of peak flow, which will be reviewed during peak flows once the facility is operating:

- During the fall harvest season, 250 trucks per 10-hour receiving day; an average of approximately 25 trucks per hour
- Average scale house-to-scale house time is approximately 8 to 10 minutes; therefore, can process approximately 8 to 12 trucks per hour through the unloading facility
- The facility vehicle staging area can accommodate approximately 30 trucks

Heron Lake BioEnergy strongly promotes the health and safety of drivers, staff and visitors, and will implement the control measures in this plan to limit exposure to diesel idling emissions to the extent practicable.

The major challenges to implementing the plan effectively are the communication and enforcement of the control measures. The vehicles delivering corn are not part of a transport fleet that would facilitate fleet-wide communication of the requirements, and the fact that the measures are required seasonally means that the measures will not be part of a year-round routine for the drivers.

Notification of these requirements will be established by posting of this policy on the Heron Lake BioEnergy website at: [www.heronlakebioenergy.com](http://www.heronlakebioenergy.com). This website is commonly used by truck drivers to verify delivery schedules and will provide a convenient way to communicate the required measures. Heron Lake BioEnergy will encourage drivers' adherence to the control measures by an education approach rather than an enforcement approach.

**Idling Control Measures.** In order to limit the idling time and exposure of drivers, staff and visitors to diesel idling emissions, Heron Lake BioEnergy shall:

- (1) Locate the vehicle staging area downwind when possible (based on predominant wind direction) and away from the Administration Building and Process Building air intake systems, and away from the other facility parking areas.
- (2) Once the truck capacity of the staging area has been reached, require drivers to turn engines off when they are in the staging area for more than 15 minutes.

**Exemptions.** The requirement that a driver must turn off the vehicle and refrain from idling does not apply for the period or periods during which idling is necessary under the following circumstances:

**(a) Turbo-diesel Engine Cool Down or Warm Up**

To cool down a turbo-charged diesel engine before turning off the engine or to warm up a turbo-charged diesel engine, idling will be allowed.

**(b) Cold and Hot Weather**

If the outside temperature is less than 32°F degrees or greater than 75°F, idling to operate heaters or air conditioners will be allowed.

**(c) Safety or Emergencies**

If traffic, safety or emergency situations warrant continued operation of vehicles, idling will be allowed.

**(d) Maintenance of Operations** To charge a battery or otherwise maintain the operation of the vehicle, idling will be allowed.

**Plan Review.** The measures in this plan will be reviewed following the first high-volume season to determine whether the plan is meeting its purpose and whether there additional reasonable measures that can be taken to reduce idling.