

H-GAC, TCEQ, and Construction Stakeholders Short List SIP Meeting

MEETING SUMMARY

December 15, 2008
10:30am to 12:00pm
H-GAC
3555 Timmons Lane,
2nd Floor, Room C
Houston, Texas 77027

Persons Present:

Ken Gathright (PoHA), Bill Duguay (J.D. Abrams), Bob Lanham (Williams Bros. Construction),

Staff Present:

Donna Huff (TCEQ), Koy Howard (TCEQ), Lola Brown (TCEQ), Shelley Whitworth (H-GAC), Graciela Lubertino (H-GAC), Kelli Angelone (H-GAC), Connie Chao (H-GAC), Mary Schuwerk (H-GAC), J. Ben Finley (H-GAC), Chris Lindhjem (ENVIRON)

Environ Presentation: Overview of SIP Process and Control Strategy Discussion.

Environ reviewed the process by which control strategies were gathered into a master list, then narrowed into a short list of feasible strategies. The strategies that were considered for the Houston-Galveston-Brazoria region's State Implementation Plan (SIP) are voluntary control measures that have stakeholder support.

H-GAC Discussion : Control Strategies (See handouts, (“Control Measure: Construction Contracting Incentives, Measure 8” and “Control Measure: Construction and other off-road idle reduction, Measure 10”)

ENVIRON and H-GAC reviewed the two off-road construction strategies from the short list and asked for comments and recommendations from industry representatives.

PUBLIC COMMENTS:

- 1) Williams Brothers said that the suggested measure, “Construction Contracting Incentives”, had implementation/feasibility problems because it would not work as a fixed requirement and industry would not support it. They said the basic problem is the cavalier attitude taken on when equipment or new technology would be available. The measure was much more viable under the other option as a voluntary or incentive approach. Conceptually, an incentive-based approach would be supported by industry, but we will be asking people to do things that contractors will tell you they cannot do.
- 2) The incentives listed in “Table 1, the TxDOT clean engine incentive and calculated benefit” are not worthy of being used. It is an unused incentive because it is not enough to pay the person to track the data.
- 3) Another issue is that there is very little publicly-funded construction, so benefits will be limited. The Regional Air Quality Planning Committee's Policy

- Subcommittee had some recommendations for what the dollar amounts should be for the incentive.
- a. Environ commented that yes, this was true: publicly-funded construction only accounted for about 10% of construction. It does not get the most of the activity.
 - 4) Williams Brothers continued, saying that the reason people are willing to do engines [retrofits] is because there is only a \$40,000 engine in a \$500,000 piece of equipment. [It is more cost-effective to do a retrofit than purchase a new vehicle.]
 - 5) Environ commented that just restricting the incentive to publicly-funded construction is not enough to make a significant reduction. We need to figure out how to use it for everything.
 - 6) For the measure, “Construction and other off-road idle-reduction”, Environ commented that anti-idling was very cost-effective.
 - a. H-GAC asked how idling reductions would be estimated by industry groups.
 - b. Environ said that reduced hours could be determined through tracking hour-meters.
 - c. Williams Brother commented that they had an idle-reduction policy, but that they have no idea what the benefit of it is. Concerns regarding this measure are that conflicting information would come out of attempting to estimate this because what industry groups say their usage is would be compared to TCEQ’s model, and they would not match.
 - 7) H-GAC asked if you could look at old projects where equipment was leased on a time-basis?
 - a. Williams Brothers replied that they rent equipment based on the standard 176 hour per month usage. Charges are increased if the equipment is run more, but the minimum 176 is charged if you run less [accuracy issue]. Some leased equipment could possibly be sampled.
 - 8) H-GAC asked if there were any companies that lease equipment that could be asked.
 - a. Williams Brothers said there might be.
 - 9) Williams Brothers commented that fuel data is too erratic to use for estimation because of the construction market.
 - a. J.D Abrams said they do not look at fuel data in a way that would be helpful for H-GAC.
 - b. H-GAC asked if the percentage of fuel reductions before the fuel price increase, would that be acceptable for documentation?
 - c. TCEQ said that their model looks more at activity in hours of use for equipment, so it does not look at fuel use very much.
 - 10) Williams Brothers asked if idling reduction estimations were done in the past.
 - a. Environ answered, yes, based on total hours.
 - 11) Williams Brothers asked what the assumed hours per day were for a piece of equipment.
 - a. Environ answered that for an excavator it was 1092 hours/year and that a year was about 260 days. That equals 4.2 hours per day that the engine would be running.

- b. Williams Brothers said that sounded right, but that if anything, equipment would tend to be oversized, not undersized [part of Environ's estimations].
- c. Williams Brothers commented that it looked like H-GAC and Environ had a fairly good handle on the activity estimation.

H-GAC Discussion : MOUs/ MOAs

PUBLIC COMMENTS:

- 1) H-GAC asked the construction industry about signing an MOU to do a research project documenting emission reduction.
 - a. Williams Brothers said that because their research is being done through a private company that is trying to get certified, they would have to talk to the manufacturer of some equipment they are testing out.
- 2) Williams Brothers recommended that emphasis be put in SCR and other emerging technologies.
- 3) Williams Brothers asked about an anti-idling device and how it would work.
 - a. Environ answered that it was a timer that monitors engine temperature and other things. The biggest consumer is the railroad industry.
- 4) H-GAC asked if someone volunteered to document anti-idling equipment, how it should be done.
 - a. TCEQ answered that they would have to get back to us on that because they were not sure the off-road model could deal with that.
 - b. Environ said that it would be difficult for the model because even though it would reduce hours of activity, it would increase load factor. Some calculations can be done independent of the model, though. H-GAC and industry groups would have to be careful not to overestimate reductions.
 - c. TCEQ commented that if they get more cooperation from the industry regarding activity, they could incorporate reductions into the model.
 - d. Williams Brothers said that they would like to know how to do the calculations to estimate the reductions too. As a company, they have not tracked hours of activity every day, but once a week or once every two weeks. From a business standpoint, they are not interested in how a piece of equipment operates on a daily basis.
- 5) H-GAC asked if it would be possible to document equipment every 500 hours?
 - a. Williams Brothers asked what the benefit of that would be.
 - b. H-GAC could use the data for usage estimations.
 - c. Williams Brothers said they could not use data-loggers because they have too many strings attached—proprietary issues and they are cost-prohibitive. It would be good to be able to 'dummy-proof' their own readings, and definitely need to do more research.
- 6) H-GAC asked how much Tier 0 equipment industry groups still owned.
 - a. Williams Brothers estimated 10%.
 - b. H-GAC commented that if it was replaced, it would get more usage.
 - c. Williams Brothers said that was only true if it was needed.

- 7) H-GAC wondered if there was anything that could be done about projects that were almost but not quite cost-effective enough for TERP, or voluntary projects that could be left open for technology that would come into play before 2018.
- 8) Williams Brothers asked if MOUs precluded using TERP.
 - a. Yes.
- 9) Williams Brothers said they could probably get a particular group to agree on an idle-reduction MOU, but without consensus on how to document, where would it get us?
 - a. H-GAC asked about purchasing equipment with shut-off switches.
 - b. Williams Brothers said they would need to know what equipment switches can be put on and how much they are, but that sounded feasible.
- 10) J.D. Abrams said that it would be beneficial to understand what drives idling, like keeping employees comfortable. Maybe there is some equipment like truck stop electrification that could be used.
 - a. H-GAC commented that there was equipment like that that could be employed.
- 11) Williams Brothers commented that what they need is more facts.

ACTION ITEM: H-GAC

- 1) **HGAC should send to the construction industry stakeholders some sample MOAs from the last SIP.**
- 2) **H-GAC should look into idle-reduction information, switch-off technologies, and other anti-idling technologies.**
- 3) **H-GAC should allow Environ and industry groups to coordinate on possible MOUs.**

ACTION ITEM: Industry Groups

- 1) **Industry representatives should look into who among the industry would be willing to commit to an MOU and what ideas they are interested in.**