

Third Party Inventory of Off-road Diesel Equipment

Diesel Background

AGC has successfully led a broad-based industry coalition (farmers, loggers, public entities) against the passage of diesel regulation in several past legislative sessions. Several bills have been proposed that would bring California's strict off-road diesel regulation to Oregon. AGC argued for the need for independent, third-party data on actual diesel emissions in Oregon. Oregon policymakers (legislators and DEQ) to date have relied on modeling data when considering off-road diesel regulation. California (the only state in the Union that has passed off-road diesel regulation) relied on similar modeling when implementing their stringent off-road diesel laws. After National AGC intervened, data from an actual inventory showed that the modeling overestimated the diesel emissions by 340%. In order to avoid the type of gross overestimation that occurred in California, we have advocated for a diesel inventory to establish what the actual diesel emissions are in Oregon. Typically, inventories that have been conducted demonstrate a much lower level of emissions than modeling.

Inventory Background

The Oregon Department of Environmental Quality (DEQ) has hired an independent third party to develop an emissions inventory of all off-road diesel equipment greater than 25 horsepower (hp) operating in the state. The inventory will be based upon surveys of equipment owners and operators. Previous emissions estimates developed by DEQ have been based upon national default information which are not representative of Oregon equipment populations or operating conditions. Conducting detailed equipment operator surveys will provide the data needed to accurately characterize Oregon-specific off-road diesel equipment operations. AGC advocated for the development of such a bottom-up emissions inventory, and appropriations for the inventory were approved by the Oregon Legislature in 2017.

Inventory Logistics and Process

Q: Who will be conducting the inventory?

A: The inventory will be done by Eastern Research Group (ERG), a third party which has conducted similar surveys and emissions inventories in Texas and California, as well as numerous other sector-specific studies.

Q: Who will be inventoried?

A: The project will include surveying all public and private sectors that use off-road diesel equipment (i.e., construction, agriculture, logging, public works departments, recreational marine, etc.).

Q: Who will have access to the information gathered?

A: Only ERG will have information from each company. The information collected will only be given to DEQ in aggregate form and DEQ will not be involved directly in the data collection or analysis.

Q: What do I need to do?

A: AGC requests your participation in the survey if you are contacted for information. We know that all our members are extremely busy this time of year, but your cooperation will help ensure a reliable and accurate assessment of the emissions associated with off-road diesel equipment use.

As part of this survey, you may be contacted by ERG between October and December. The survey questions will focus on the following:

- number and type of equipment owned/operated in the state in 2017
- equipment make, model, model year, and horsepower
- annual fuel consumption
- engine on-time and hours of operation (including weekly and seasonal distribution of hours)
- anticipated retirement schedule
- equipment ownership (own, rent, or lease)
- other details regarding your company structure/operation

Q: How much time will this take and how do I provide the information?

A: Companies with a small number of pieces of equipment (i.e., less than 5 units > 25 hp) will likely be able to provide this information to ERG survey staff during a 10-20 minute telephone conversation. Companies with larger fleets of equipment can submit information electronically through an on-line survey or other method of their choosing (e.g. database reports, Excel spreadsheets, etc.). Members of the ERG study team will be available to answer any questions or assist in completing the survey.

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