Reporting for Austin-Round Rock MSA 2019-2023 Air Quality Plan

August 31, 2018

Why Reporting is Valuable

There are several reasons why annual reporting is an important part of the regional air quality plan:

1. It documents the "level of control of emissions within a region" which is one of the factors the EPA considers when deciding whether to designate an area as "nonattainment" and the extent of any "nonattainment" area
2. It enables assessment of the effectiveness of the plan, the extent to which the region is achieving the plan's goals, and whether any adjustments to the plan or the measures being implemented are necessary or appropriate
3. It provides a means of accountability for the CAC to review whether organizations have implemented the measures they committed to in the plan
4. It provides a means of identifying any measures that have been implemented or are being implemented that were not specifically committed to in the plan

Types of Information Requested

A CAC member's annual reporting involves two types of information:

1. Qualitative information about the implementation of measures that support the goals of the regional air quality plan
2. Quantitative information that can be used to estimate the scale of organization's impacts on regional air pollution and the measures it is taking in support of the region's air quality plan

Questions for Annual Reporting

Each CAC member will be asked to respond to the following questions:

1. What measures did your organization implement to reduce air pollution from the use of personal vehicles?
   a. Did your organization encourage eligible employees to telecommute at least once a week and on all Ozone Action Days when feasible?
   b. When employees are not telecommuting, did your organization encourage them to take low-emission modes of transportation, such as carpooling, vanpooling, transit, biking, and walking?
   c. If flexible schedules are allowed, did your organization encourage employees to consider work schedules with start times earlier than 8 am rather than later in the morning due to the higher impact of emissions on O_3 levels later in the morning?
   d. Did your organization provide incentives to employees to avoid single-occupancy vehicle commuting, particularly on Ozone Action Days?
   e. What other measures did your organization take to reduce air pollution from the use of personal vehicles – either within the organization or within the community at large?

2. What measures did your organization implement to reduce air pollution from the use of fleet/commercial vehicles and equipment?
    a. Did your organization enforce idling restriction policies for use of your organization's vehicles, equipment, and property?
    b. Did your organization prioritize the use of vehicles and equipment with low NO_X rates? (i.e. using Tier 4-certified non-road equipment rather than Tier 3-certified non-road equipment when possible or selecting to use the right size vehicle/equipment to complete a job rather than selecting a vehicle/equipment that is larger than the job.)
    c. Did your organization educate fleet users on driving and equipment operation practices that can reduce NO_X emissions?
    d. Did your organization seek funding to accelerate replacement of older, higher-emitting vehicles and equipment with newer, cleaner vehicles and equipment, such as Texas Emission Reduction Plan (TERP) grants?
    e. Did your organization receive funding to accelerate replacement of older, higher-emitting vehicles and equipment with newer, cleaner vehicles and equipment, such as Texas Emission Reduction Plan (TERP) grants?
    f. Did your organization use purchasing policies to prioritize or require low-NO_X emissions rates for new on-road vehicles and non-road equipment?
    g. Did your organization use "green" contracting policies to encourage the use of low-NO_X vehicles and equipment or avoid the use of engines during the morning on Ozone Action Days as part of landscaping and construction contracts?
    h. Did your organization purchase higher-grade gasoline with lower sulfur content?
    i. Enforce vehicle idling restrictions within the community [either through an ordinance if a city or a memorandum of agreement with TCEQ if a county]?
    j. What other measures did your organization take to reduce air pollution from the use of fleet/commercial vehicles and equipment – either within the organization or within the community at large?
3. What measures did your organization implement to reduce air pollution from power plants and other stationary combustion sources?
    a. Did your organization take steps to conserve energy, particularly on Ozone Action Days?
    b. Did your organization reschedule discretionary emission-generating activities such as engine testing and refueling to late afternoon rather than the morning, particularly on Ozone Action Days?
    c. Did your organization use purchasing policies to prioritize or require low-NO_X emissions rates for new on-road vehicles and non-road equipment?
    d. Did your organization optimize combustion and pollution controls for NO_X reductions, particularly on Ozone Action Days?
    e. What other measures did your organization take to reduce air pollution from power plants and other stationary combustion sources – either within the organization or within the community at large?
4. What measures did your organization implement to promote awareness of air quality and reduce public exposure when air pollution levels are high?
    a. Did your organization educate employees about regional air quality and encouraging them to sign up for daily air quality forecasts and Ozone Action Day alerts?

b. What other measures did your organization take to promote awareness of air quality and reduce residents' exposure when air pollution levels are high – either within the organization or within the community at large?

CAC members are encouraged to report both measures targeted at their own organization and measures targeted at the community. For example:

- For "measures to reduce emissions from the use of personal vehicles," organizations should report both efforts taken to reduce emissions from the use of personal vehicles by the organization's own employees, as well as any measures taken to encourage reductions in emissions from the use of personal vehicles more broadly
- For "measures to reduce emissions from the use of fleet/commercial vehicles and equipment," organizations should report on both its enforcement of its own idling policies on its own vehicles and equipment and on any ordinance it may enforce on idling within the community

For the open-ended questions, organizations may report on as many measures as they'd like, but priority should be given to measures that would have a significant impact on NO_X emissions and ozone formation for which supporting qualitative and quantitative information is available.

Supporting Qualitative Information

CAC members will be asked to provide supporting qualitative information for the questions listed above that would be useful to a reader of the annual report to understand the nature of the measures the organization is implementing. For example:

- If the organization encourages telecommuting, providing a copy of text in the organization's personnel policies allowing for telecommuting and an e-mail to employees encouraging them to consider telecommuting will help document the organization's implementation of this measure

- If the organization restricts idling from its own fleet vehicles, provide a copy of the organization's policy.

- If the organization has an idling ordinance, the relevant citation in the municipal code and any standard operating procedures for law enforcement would help explain how the organization carries out this measure.

Supporting Quantitative Information

Quantitative information helps characterize the extent of the air pollution impact of the measures that the organization has implemented. The more detailed the quantitative information, the better the estimates of the impact of these measures can be.

Basic Operational Information

Certain basic operational data should be reported by all CAC members for each annual report:

1. Number of employees
2. Gallons of diesel fuel consumed (including any diesel-biodiesel blends with less than 20% biodiesel content)
3. Gallons of B20 (20% biodiesel – 80% petroleum diesel blend) consumed
4. Gallons of B100 (100% biodiesel) consumed
5. Gallons of gasoline consumed (including any blends with up to 10% ethanol content)

6. Gallons of E85 consumed (including any gasoline-diesel blends with at least 70% ethanol content)
7. Gallons of propane consumed
8. Gallons of gas equivalent (GGE) of compressed natural gas (CNG) consumed (for mobile sources)
9. Cubic feet of natural gas consumed (less any amount diverted for compression for use in mobile sources)
10. Kilowatt-hours of electricity consumed
11. Gallons of water consumed
12. Gallons of wastewater produced

For organizations with establishments and activity outside of the Austin-Round Rock MSA, please only report data for activities within the MSA. If such data is not readily available (for example, LCRA's service area encompassed numerous counties outside of the Austin-Round Rock MSA), please work with CAPCOG to use an appropriate surrogate to allocate your organization's activity to the five-county MSA.

Additional Operational Information

Additional operational details can be helpful in help further quantifying air pollution impacts, if available:

- Employee commuting:
    - Percentages of employees who primarily commute by SOV, carpooling, vanpooling, transit, walking, biking, motorcycle, working from home, or taxi/some other mode
    - Average number of passengers per carpool
    - Average number of passengers per vanpool
    - Average distance of a 1-way commute by mode for employees
    - % of SOV commuters who work a compressed work week
    - % of SOV commuters who telecommute, use transit, walk, or bike 1 or 2 times a week
- Fuel consumption and fleets:
    - Percentages of fuels used for on-road, non-road, and stationary equipment
    - Quantities of gasoline by grade (regular, medium, premium)
    - Vehicle and equipment inventory information (i.e., vehicle/equipment type, make, model, engine family, model year, gross vehicle weight rating, engine size, fuel type, emissions certification, hours of use, vehicle miles traveled, fuel consumed, etc.)
    - Information on construction projects and contracts (lane-miles constructed, etc.)
    - Acres of land under contract for landscaping services
- Utility data:
    - Gallons of water supplied to customers
    - Kilowatt-hours of electricity used for water supply/distribution
    - Cubic feet of natural gas used for water supply/distribution
    - Gallons of wastewater processed
    - Kilowatt-hours of electricity used for wastewater collection and processing
    - Cubic feet of natural gas used for wastewater collection and processing

Streamlined Reporting for the Lone Star Clean Fuels Alliance (LSCFA), Clean Air Partners Program (CAPP), and Air Quality Plan

Two of CAPCOG's partners – the LSCFA and the CLEAN AIR Force of Central Texas – already collect operational data as part of their programs. Starting in 2019, CAPCOG is planning to implement a streamlined reporting process that will enable organizations to report certain operational information

once without having to re-enter the data multiple times. Through this process, if an organization has already reported operational data to either LSCFA, CAF, or both, CAPCOG can simply use that data as submitted as long as the CAC member has provided those organizations with a release to share that information with CAPCOG. CAPCOG will honor any confidentiality restrictions imposed by organizations reporting to these organizations, and will work with these groups to ensure that reporting of data from organizations that have signed a release does not compromise the data for any organization that has not signed such a release.

Additional Quantitative Information

Other quantitative information can be helpful in assessing the effectiveness and impact of measures that are being implemented within the region. For example:

- If an organization is implementing idling restrictions within the community, tracking the number of tickets issued and other data related to enforcement of these rules would be helpful

- If an organization received funding for an emission reduction project, providing the estimated emission reductions and other details about the project would be helpful.

- If an organization purchased higher-grade fuels with lower sulfur content during certain periods, indicating what time frames this occurred and amounts paid would be helpful

- If an organization has been able to quantify the kW or kWh of energy efficiency and/or renewable energy initiatives, CAPCOG can use that data to calculate associated emission reduction benefits

Organizations should report whatever information that they feel is necessary or appropriate to help document its air quality impact.

Timeline for Reporting

CAPCOG anticipates having a reporting time frame of April 1 – May 31 of each year for activity from the previous calendar year. Organizations submitting reports will have an opportunity to review a draft of the annual report and offer comments and corrections before CAPCOG finalizes and distributes the report.