



# Response to Comments

## RFI #DEQ 1139-17

### Non-Road Diesel Emission Inventory

The RFI was posted on ORPIN on January 9, 2018 and closed for comment at 5 PM, January 26, 2018. One response to the RFI was received from Trinity Consultants. The RFI posed 4 specific queries.

Query	Response	DEQ response
1. Source Classification Codes are used to classify different types of activities that generate emissions. What SCC codes should be included for the non-road emission analysis? If confidence in data quality for a given SCC is high or the source category is deemed marginal, should the RFP direct the consultant to focus on SCCs where data quality are poorer or more significant contributor?	The breadth of SCCs to include depends upon the intended use. For the broad use described, the recommendation is to include all 31 SCCs listed and even include other relevant categories.	DEQ agrees. The overall intention in this action is to complete a broad inventory rather than to develop specific regulatory actions.
2. In addition to collecting data pertaining to informing the emission calculation formula described above, what other information should the consultant be requested to collect, e.g., activity location in prior year, project activities and equipment typically associated with that activity?	Similar to the previous query, it is dependent on intended downstream use. For SIP modeling, spatially-resolved population/use/estimates; for photochemical grid modeling or nonattainment areas not corresponding to county boundaries, sub-county resolution; to forecast or back cast equipment/vehicle activity, spatial migration is important to collect. Temporal activity will be critical for equipment that shows seasonal variation.	DEQ agrees that it will be beneficial for future modeling to collect data needed in order to spatially and temporally resolve survey results.
3. Are there additional policy related questions not directly tied to development of an emission inventory for which data could be collected, e.g., equipment breakdown by ownership including minority-, women owned and disadvantaged businesses, equipment leasing companies?	While the firm's focus is on technical research and policy analysis rather than policy development, it will be important to obtain adequate information to differentiate equipment ownership patterns to assess impacts of potential control measures.	DEQ agrees that information that could influence potential emissions control measures would be beneficial.

<p>4. DEQ is interested in receiving input on any other consideration that is critical to developing a high quality emission inventory analysis.</p>	<p>A stratified sampling survey can yield data based on low response rate leading to high risk of bias and significant error when the results are extrapolated to larger populations. Recommend an approach that engages stakeholder industry groups as well as other available data bases like building permits for validation.</p>	<p>DEQ agrees that an approach that engages industry groups will more likely lead to a more accurate result than a stratified survey.</p>
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