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Subject: Port of Houston Authority comments on the Area and Mobile Source Credits potential rulemaking
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Attachments: [image001.png](#)

The Port of Houston Authority (PHA) offers the following comments on the proposed rulemaking. The majority of the comments will be a list of possible credit generation projects that PHA or our tenants have done in the past or potentially could do in the future.

However, before we list the projects, we have two comments on the overall proposed strategy.

- Credits must be surplus to the SIP emissions - Some future PHA equipment/vehicle replacement projects could be done with the VW Partial Consent Decree funds. Will emission reductions that result from projects funded by the VW settlement be considered surplus? PHA asks this question since the VW settlement was done to make up for emissions reductions that did not occur. Also, PHA plans to set up a SEP in the future. Will PHA projects that use SEP funds be eligible for mobile emission reduction credits?
- Credits will not be issued to mobile sources that do not operate mostly with the nonattainment area – One possible future project could be providing shorepower to ocean going vessels however these vessels do not spend the majority of the time in the HGB nonattainment area. PHA recommends that TCEQ clarify this restriction for projects like this one.

What follows are projects that PHA or its tenants have done in the past or will possibly do in the future

- Replacing old equipment/vehicles with newer less emitting equipment/vehicles.
 - However, if the replacement is electric powered will emissions from the power plant providing the electricity have to be considered.
- Moving containers by barge instead of truck from PHA terminal. For instance, instead of a 100 trucks picking up 100 containers from the Bayport Container terminal and taking it to a warehouse in Baytown; the containers would instead be placed on a barge and shipped over to a barge terminal near the warehouse.
 - In this case it is assumed the credit would be based on the avoided truck emissions with the emissions from the boat pushing the barge plus the crane/container handler (that moves the containers onto and off the barge) subtracted out. The boat emissions and the crane/container handler emissions will be known, however, how do you account for the avoided truck emissions? Do you just use the emission standard from the average model year of the trucks that visit PHA?
- Improvements to the truck gates at PHA container terminals. PHA has recently made improvement to our container terminals that result in less idling. For instance at our Bayport terminal we are using Optical Character Recognition (OCR) at two of the four gates. This means that at those gates, the trucks no longer have to stop where a clerk on the ground types all the information into a handheld. Now they just proceed through these gates and the OCR collects all the required data. It is expected that a credit can be generated by the idling that no longer occurs. PHA will be implementing a truck registry soon which means we will know the model year of each truck that visits the terminal but the

amount of idling will be from estimates from our gate operations staff.

- Double tracking at a rail bottleneck – There is a future project that will build another rail track so that trains will not have to idle several hours. Currently, there is a location where only a single track goes under a road which has created a bottle neck for rail traffic near the ship channel. This means trains have to idle several hours before the rail is clear. When the second track is built at this location, then the idling will not occur or be a lot less. The credit would occur from the reduced or eliminated idling emissions. However, the amount of idling would be based on estimates from the industry and details on the actual locomotives will not be known (unless a system was set up to report that information.)

Thanks for this opportunity to provide feedback and please contact me at kgathright@poha.com or 713-670-2690.

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