Is the Construction Industry Really “Digging Up Trouble?”

According to a report recently issued by the Union of Concerned Scientists, “Digging Up Trouble”, construction pollution is very harmful to the public’s health. The report came on the heels of the California Air Resources Board (CARB) proposed regulation that would require significant reductions in engine emissions. In the report, UCS purported the effects of construction pollution on the public’s health have caused a number deaths and illnesses costing California more than $9.1 billion.

AGC of California is a founding member of the Construction Industry Air Quality Coalition which has represented the industry on air quality issues with agencies including the California Air Resources Board, Environmental Protection Agency (EPA), and a number of local and regional air quality districts regarding the air quality and environmental regulations. In its response to the report, AGC noted the industry’s efforts in protecting the environment and the public’s safety through involvement in voluntary diesel retrofit programs and a variety of initiatives at the regional, state and national levels.

The UCS report gives the impression that the construction community should be forced to retrofit its equipment and develop affordable equipment retrofit. What the report failed to examine is that the cost to repower a single piece of equipment such as a single engine scraper can be as much as $120,000. The report cited that diesel particulate matter filters currently cost $5,000-$10,000 could be installed on engines – it did not mention that it can only be installed on certain machines with engines built after 1995. In addition, there are only a few technologies that are verified by either EPA or CARB for use on off-road diesel applications.

In reviewing the UCS report, CIQC noted that there is no scientific basis for the conclusions offered. It pointed out that the Concerned Scientists report attempted to mathematically link premature deaths in California with exposure to construction equipment emissions and had made erroneous assumptions such as:

- that all construction projects reviewed involved the use of heavy-duty off-road construction equipment,
- that construction emissions are a significant contributor to existing levels of NOx and PM,
- that exposure to construction site emissions last a sufficient number of years and have a health impact, and
- that proximity to a construction site is a health risk.

In fact the statewide inventory of NOx and PM emissions attributable to construction activities today is only about 10% and declining due to the construction industry’s voluntary efforts of retrofitting diesel engines.

Recent changes in diesel fuel formulation have reduced PM emissions and massive voluntary reductions implemented by the construction industry through the Carl Moyer program have reduced PM by 100 tons and NOx by over 3,000 tons annually. The Carl Moyer program is considered to be the largest single voluntary reduction emissions program in California history.

AGC members were previously notified of CARB’s plan to hold public workshops. The workshops are scheduled as follows: December 18 in Sacramento, December 20 in Los Angeles and December 21 in Fresno. CARB has posted its proposed rules at: http://arb.ca.gov/msprog/ordiesel/documents/Reg_Language_post_12-4.pdf.

Any member wishing to participate or with questions should contact John Hakel at 626/608-5800 or hakelj@agc-ca.org.