May 9, 2011

Via Certified Mail, Return Receipt Requested

Secretary
Port Authority of New York and New Jersey
225 Park Avenue South
New York, NY 10003
Attn: FOI Administrator

RE: Request for Records Regarding Port Authority’s Truck Replacement Program

Dear Freedom of Information Officer:

I write on behalf of the Coalition for Healthy Ports ("the Coalition") to request public records pursuant to the Port Authority of New York and New Jersey’s ("the Port Authority") Freedom of Information Policy and Procedure.

The Coalition is a partnership of nearly two dozen environmental, public health, labor, faith-based and community organizations working to reverse the unintended, deadly consequences of a failed, deregulated port trucking economy. As detailed below, the Coalition seeks access to records pertaining to the Port Authority’s Truck Replacement Program, which is a part of the Port Authority’s Clean Air Strategy and was announced on March 10, 2010. The Truck Replacement Program is a $28 million program, partly funded by a $7 million grant from the United States Environmental Protection Agency, designed to encourage the owners of up to 636 pre-1994 drayage trucks that regularly serve the port to purchase newer, cleaner vehicles. Since the success or failure of the Truck Replacement Program will impact the Coalition’s mission, as well as the thousands of people that the Coalition represents, the Coalition has a heightened interest in these records.

The Port Authority’s Freedom of Information Policy

The Port Authority’s Freedom of Information Policy is found in its by-laws, which state “[t]he Port Authority conducts its business in the public interest and therefore the public should have access to the records of the Port Authority. The Port Authority shall follow a Freedom of Information Policy consistent with the freedom of information laws of the two States.” By-Laws of the Port Authority of New York and New Jersey, § V(I), last amended May 22, 2008.
Subsequent to the most recent amendment of the by-laws, Port Authority staff conducted a review of the Port Authority’s Freedom of Information Policy and Procedure and recommended a number of changes designed to provide uninhibited access to the Port Authority’s public records and to make the Port Authority’s policy more accurately reflect the New York Freedom of Information Law and New Jersey’s Open Public Records Act. Those recommendations prompted the Port Authority’s Board of Commissioners to unanimously adopt a resolution that can be found at http://www.panynj.gov/faqs/freedom-of-information.html (“the Resolution”). The Commissioners stated in the Resolution that “the activities and decisions of the Port Authority (and its subsidiary corporations) are the public’s business,” and expressed their “continuing commitment to transparency in the conduct of the public’s business, so that the Port Authority and its employees may hold the respect and confidence of the people of the State of New York and New Jersey.”

The Resolution stated further that “all records of the Port Authority (and its subsidiary corporations), including records stored electronically, such as on computer tapes or disks, shall be made available for public inspection and/or copying,” with the exception of eight categories of records that are exempt from disclosure. New Jersey’s Open Public Records Act, N.J.S.A. § 47:1A-1 et seq., defines records as:

any paper, written or printed book, document, drawing, map, plan, photograph, microfilm, data processed or image processed document, information stored or maintained electronically or by sound-recording or in a similar device, or any copy thereof, that has been made, maintained or kept on file in the course of his or its official business by an officer, commission, agency or authority of the State of or any political subdivision thereof, including subordinate boards thereof, or that has been received in the course of his or its official business by any such officer, commission, agency, or authority of the State or of any political subdivision thereof, including subordinate boards thereof.

N.J.S.A. § 47:1A-1.1. Similarly, New York’s Freedom of Information Law, Public Officers Law, Art. 6, §§ 84-90, defines a record as:

any information kept, held, filed, produced or reproduced by, with or for an agency or the state legislature, in any physical form whatsoever including, but not limited to, reports, statements, examinations, memoranda, opinions, folders, files, books, manuals, pamphlets, forms, papers, designs, drawings, maps, photos, letters, microfilms, computer tapes or discs, rules, regulations, or codes.

Pub. Off. L., Art. 6, § 86. Therefore, the definition of “records” that shall be made available for public inspection pursuant to the Port Authority’s policy is very broad and encompasses a wide array of documents, data, and information stored by means of various media.

**The Coalitions’ Records Request**

With the above-mentioned principles in mind, the Coalition hereby requests access to the following records pertaining to the Truck Replacement Program for inspection and/or copying:
1. Any and all policies regarding eligibility for the Truck Replacement Program
2. Total number of applicants to date, including whether those applicants have applied as independent owner-operators or as licensed motor carriers
3. The total number of applicants, whether classified as independent owner-operators or licensed motor carriers, that have been denied either a loan or a grant or both
4. The total number of grants and/or loans distributed to independent owner-operators, including the dollar amounts of each grant and/or loan
5. The total number of grants and/or loans distributed to licensed motor carriers, including the dollar amounts of each grant and/or loan
6. The total amount of money left in the program to date, as well as the total amount that has been distributed in grants or loans
7. The total number of trucks that have been purchased through the Truck Replacement Program
8. The total number of trucks that have been scrapped as a result of the Truck Replacement Program
9. Any and all correspondence between the Port Authority and the United States Environmental Protection Agency related to or discussing the Truck Replacement Program
10. Any and all correspondence between the Port Authority and the New Jersey Department of Environmental Protection related to or discussing the Truck Replacement Program
11. Any and all correspondence between the Port Authority and the New York Department of Environmental Conservation related to or discussing the Truck Replacement Program.
12. A copy of all records requests received by the Port Authority that request records pertaining to the Truck Replacement Program or the Drayage Truck Registry
13. A copy of the list required to be kept by the Secretary of the Port Authority that details, by subject matter, all of the records in possession of the Port Authority (and its subsidiary corporations)
14. 2010 Port Authority 2010 Drayage Truck Survey
15. Current Clean Air Plan and Truck Ban and Replacement policy documents from the PANYNJ

Pursuant to the Port Authority’s Freedom of Information Policy and Procedure, the Secretary of the Port Authority is required to respond to this request within five business days of the receipt thereof by granting access, denying access, or acknowledging receipt of the request and providing a date that is within twenty days from the initial response on which the Port Authority shall grant or deny the request. Accordingly, the Coalition fully expects to receive a response from the Port Authority within five days of its receipt of this request.

Should the Secretary determine that any of the above requested records are exempt from disclosure, the Coalition requests that the Secretary identify which of the eight categories of exempted records in the Resolution applies to such requested records. Further, should the Secretary determine that any of the above requests are so overly broad as to make it impracticable for the Secretary to identify such records, the Coalition requests that the Secretary
identify such requests so that the Coalition may work cooperatively with the Port Authority to
determine the records that the Coalition is seeking.

In closing, the Coalition is in wholehearted agreement with the New York Legislature
that “a free society is maintained when government is responsive and responsible to the public,
and when the public as aware of governmental actions.” Pub. Off. L., Art. 6, § 84. Further,
“[t]he people’s right to know the process of governmental decision-making and to review the
documents and statistics leading to determinations is basic to our society. Access to such
information should not be thwarted by shrouding it with the cloak of secrecy or confidentiality.”
Id. In that spirit, the Port Authority should be aware that if the Coalition is denied access to any
of the above requested records, the Coalition is fully prepared to utilize all means available,
including but not limited to filing an appeal with the Port Authority’s General Counsel, to obtain
those records.

The Coalition would like to thank the Port Authority in advance for its attention to this
records request. All correspondence regarding this request shall be directed to myself. Please do
not hesitate to contact me by phone at (973) 424-1485 or by e-mail at
wschulte@easternenvironmental.org should you have any questions concerning this request.

Sincerely,

William J. Schulte, Esq.

cc: Governor Chris Christie
Lisa Jackson, Administrator, Environmental Protection Agency
Judith Enck, Regional Administrator, United States Environmental Protection Agency
Robert Martin, Commissioner, New Jersey Department of Environmental Protection
Joseph Martens, Commissioner, New York Department of Environmental Conservation
Chris Ward, Executive Director, Port Authority of New York and New Jersey
Bill Baroni, Deputy Executive Director, Port Authority of New York and New Jersey
Amy Goldsmith, Chair, Coalition for Healthy Ports
July 29, 2011

Mr. William J. Schulte  
Eastern Environmental Law Center  
744 Broad Street  
Suite 1525  
Newark, NJ 07102  

Re: Freedom of Information Reference No. 12337  

Dear Mr. Schulte:

This is a response to your May 9, 2011 request under The Port Authority of New York and New Jersey’s Freedom of Information Policy for copies of various records pertaining to the Port Authority’s Truck Replacement Program.

Material responsive to Items 2, 3, 4, 5, 6, 7, 8, 12, 13 and 14 of your request and available under the Policy, which consists of 211 pages, will be forwarded to your attention upon receipt of a photocopying fee of $52.75 (25¢ per page). Payment should be made in cash, certified check, company check or money order payable to “The Port Authority of New York & New Jersey” and should be sent to my attention at 225 Park Avenue South, 17th Floor, New York, NY 10003.

Some material responsive to Item 12 of your request is exempt from disclosure pursuant to exemption (2).

Material responsive to Items 1 and 15 of your request may be found on the Port Authority’s website.

Please be advised that the Policy provides that in the event a search for records requested requires more than one-person hour, or in the event a search of computer records requires programming that would take more than one-person hour, a fee will be charged. It is estimated that it will take approximately 41 hours of staff time at a composite hourly rate of $72.18 for a total of $2,959.27 to search for records that may be responsive to items 9, 10 and 11 of your request. An accounting of the actual time spent searching for the records will be maintained and should it amount to less than the estimated hours, the unused portion of your payment will be refunded to you. Accordingly, if it takes more than the estimated hours, you will be advised of the additional fee.
It is important to note that some or all of the documents or portions thereof, identified as being responsive to your request may be exempt from disclosure in whole or in part pursuant to one or more of the exemptions in the Policy. After a search has been conducted, you will be notified in writing as to the availability of documents under the Policy. At that time, you may schedule a mutually convenient time for the review of the documents at our office, or pay the applicable photocopying fee ($2.25 per page) for the material.

If you would like us to proceed with the search, payment of $2,959.27 must be received in advance in the form of a certified check or money order made payable to “The Port Authority of New York and New Jersey” and addressed to the undersigned at 225 Park Avenue South – 17th Floor, New York, NY 10003.

If you wish to narrow your request, you may do so in writing to the undersigned. A narrowing of your request may result in a reduced search fee.

Please refer to the above FOI Reference number in any future correspondence relating to your request.

Very truly yours,

Daniel D. Duffy
FOI Administrator
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Purchased/Scrapped as of May 9, 2011

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5 Applicants Ineligible for Grant as of May 9, 2011

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The Port Authority of New York and New Jersey
Drayage Truck Characterization Survey

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Starcrest Consulting Group, LLC 31 December 2010
At the direction of the Port Authority of New York and New Jersey, Consulting Group, LLC (Starcrest) and Helen Mott MacDonald (HMM) conducted a survey of drayage trucks calling on Port Authority marine container terminals (leased to private companies). The purpose of the survey was to collect information on the age and activity characteristics of drayage trucks, as an update to the similar survey conducted previously. Questions related to these characteristics is included in Appendix E.

The marine terminals that were surveyed represent each of the Port Authority’s container terminals:

- Port Newark: Port Newark Container Terminal
- Elizabeth Port Authority Marine Terminal: Maher Terminals
- Staten Island, New York: New York Container Terminal
- Bayonne, New Jersey: Global Marine Terminal

The information derived from the survey results includes the model year distribution of the fleet of trucks serving the Port Authority terminals, including the relative differences in model year between owner-operated and employee-operated trucks, and an estimate of the total number of trucks in various model year groups. Model year is an important characteristic of drayage trucks (and motor vehicles in general) because emission standards are applicable on a model year basis, and newer trucks are generally subject to stricter (lower) emission standards than older trucks.

Figure E.S.1 illustrates the percentage of trucks of each model year from the survey sample. The highest percentage (most common) model year is 2000, accounting for 11% of trucks surveyed. The average and median model years are also 2000 (ten years old). The median value reflects the age at which half of trucks are older and half are newer.

The model years depicted in Table E.S.1 have been divided into model year groups, such that the years within each group were subject to similar emission standards when new. Information presented in Tables E.S.1 and E.S.2 indicates that of all trucks serving the Port Authority, approximately 4.5% are of model year 1993 or older; 22% are of model year between 1994 and 1997; 46% are of model year between 1998 and 2003; 21% are of model year between 2004 and 2006 and 6.4% are of model year 2007 or newer. In Figure E.S.2, the distribution of trucks in the various model year groups is depicted for trucks being driven by owners. Approximately 94% of trucks driven by these owner-operators are of model year 1994 or newer. Figure E.S.3 illustrates the model year group distribution of trucks driven by other than the owner, such as by an employee or contract driver. Approximately 97% of trucks driven by other than the owner are of model year 1994 or newer.
Figure E.S.1: Model Year Distribution of Trucks Visiting the Port Authority Terminals

Figure E.S.2: Model Year Group Distribution of Owner-Driven Trucks at the Port Authority Terminals
Figure E.S.3: Model Year Distribution of Trucks Driven by Other than Owner at the Port Authority Terminals

The number of trucks in each model year group was estimated using reported frequency of visits to Port Authority terminals and the estimated total number truck visits per week. Visit frequencies were divided into five groups, ranging from the frequently visiting group of trucks making 15 or more trips to a Port Authority terminal per week (an average of three trips per day) to the least frequently visiting group averaging fewer than 2.5 visits per week (making, on average, less than one visit every other day). Table E.S.1 and Figure E.S.4 illustrate the estimated number of trucks in each model year and visit frequency group. The table illustrates an estimated 1,874 trucks, for example, in the 7 to 15 visit-per-week group, with 124 of those being model year 2007 or newer and 12 being older than model year 1990.

Table E.S.1: Distribution of Model Year and Visit Frequency Groups

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<td>04 - '06</td>
<td>98 - '93</td>
<td>94 - '97</td>
<td>90 - '93</td>
<td>pre-90</td>
</tr>
<tr>
<td>2007 or newer</td>
<td>54</td>
<td>124</td>
<td>62</td>
<td>145</td>
<td>158</td>
<td>543</td>
<td></td>
</tr>
<tr>
<td>2004-2006</td>
<td>138</td>
<td>301</td>
<td>335</td>
<td>325</td>
<td>684</td>
<td>1,783</td>
<td></td>
</tr>
<tr>
<td>1998-2003</td>
<td>466</td>
<td>919</td>
<td>670</td>
<td>735</td>
<td>1,131</td>
<td>3,920</td>
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</tr>
<tr>
<td>1994-1997</td>
<td>287</td>
<td>473</td>
<td>163</td>
<td>277</td>
<td>657</td>
<td>1,859</td>
<td></td>
</tr>
<tr>
<td>1990-1993</td>
<td>50</td>
<td>44</td>
<td>31</td>
<td>36</td>
<td>105</td>
<td>267</td>
<td></td>
</tr>
<tr>
<td>Pre-1990</td>
<td>35</td>
<td>12</td>
<td>23</td>
<td>0</td>
<td>53</td>
<td>123</td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>1,031</td>
<td>1,874</td>
<td>1,285</td>
<td>1,519</td>
<td>2,788</td>
<td>8,496</td>
<td></td>
</tr>
</tbody>
</table>

Starcrest Consulting Group, LLC
E.S.3
31 December 2010
To focus in more closely on the trucks that most often visit Port Authority terminals, the groups representing trucks that visit five or more times per week (on average at least once per day, represented by columns two, three, and four in Table E.S.1) were consolidated and evaluated. Table E.S.2 summarizes the estimated number and percentage of these trucks in each model year group, as well as the overall population estimates for each model year group. The percentages do not add precisely to 100% because of rounding. Figure E.S.5 presents the frequent truck information graphically, whereas the overall distribution by age group has been presented previously in Figure E.S.1.

Table E.S.2: Estimated Population Distribution of Frequently Calling Trucks and All Trucks

<table>
<thead>
<tr>
<th>Model Year Ranges</th>
<th>Frequently Calling</th>
<th>All Trucks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimated Population</td>
<td>Estimated Percentage</td>
</tr>
<tr>
<td>2007 or newer</td>
<td>241</td>
<td>5.8%</td>
</tr>
<tr>
<td>2004-2006</td>
<td>774</td>
<td>18.5%</td>
</tr>
<tr>
<td>1998-2003</td>
<td>2,054</td>
<td>49.0%</td>
</tr>
<tr>
<td>1994-1997</td>
<td>924</td>
<td>22.1%</td>
</tr>
<tr>
<td>1990-1993</td>
<td>126</td>
<td>3.0%</td>
</tr>
<tr>
<td>Pre-1990</td>
<td>70</td>
<td>1.7%</td>
</tr>
<tr>
<td>Totals</td>
<td>4,189</td>
<td>100%</td>
</tr>
</tbody>
</table>
Figure E.S.5: Estimated Population Distribution of Frequently Calling Trucks

Figure E.S.6: Estimated Population Distribution of All Trucks
1.0 INTRODUCTION

At the direction of the Port Authority of New York and New Jersey (the Port Authority), Starcrest Consulting Group, LLC (Starcrest) and Hatch Mott MacDonald (HMM) conducted a survey of the drayage trucks calling on Port Authority marine container terminals (leased to private companies). The purpose of the survey was to collect information on the age and activity characteristics of drayage trucks, as an update to the similar survey conducted in 2008. A copy of the survey questions related to these characteristics is included in Appendix A.

The marine terminals that were surveyed represent each of the major operating areas of the Port Authority's container terminals:

- Port Newark: Port Newark Container Terminal
- Elizabeth Port Authority Marine Terminal: Maher Terminal
- Staten Island, New York: New York Container Terminal
- Bayonne, New Jersey: Global Marine Terminal

The terminals were surveyed during six days between 10 December 2010 and 17 December 2010 (excluding weekend days) at locations and times determined through coordination with the terminal operators. One of the primary considerations required by the operators was that the drivers would not be unduly delayed so as to avoid creating a backup in terminal operations. The surveyors were stationed at locations approved by the operators where drivers routinely spend time waiting, such as inspection stations where trailers and empty containers are inspected, and trouble windows, where drivers resolve issues with the paperwork on their loads. The surveyors confirmed with operations personnel that the reasons the drivers were waiting at these areas were not related to the age of their trucks – so there was no selection bias related to the survey locations that would have caused, for example, trucks older or newer than average to be selected for survey.
related to operations associated with Port Authority container terminals. The following subsections detail the characteristics of the trucks and various aspects of their operations on the terminals, such as how frequently they visit the marine terminals.

2.1 Model Year Percentages

Model year is an important characteristic of drayage trucks (and motor vehicles in general) because emission standards are applicable on an engine model year basis, and newer engines are generally subject to stricter (lower) emission standards than older engines. The trucks were categorized by model year, and the model years were divided into groups based on the progression of emission standards for heavy-duty diesel vehicles (HDDVs). The groups, listed below, were chosen to reflect the model years that were affected by different emission standards, such that the vehicles in each group were subject to the same emission standards when new. For example, trucks with engines built during the 1998-to-2003 model year group were all subject to the same emission standards; a new set of emission standards became effective in 2004, which applied to truck engines manufactured during the 2004 through 2006 model years. While some trucks of a given model year are powered by engines of the previous model year (i.e., a 2009 truck may be equipped with a 2008 engine) this survey is based only on the truck model year due to the difficulty of ascertaining engine model years for the large number of trucks surveyed. Categories were also developed for terminal visit frequencies to help characterize the vehicles that regularly service Port Authority terminals. In addition, the trucks were categorized as being owner-operated or owned by other than the driver. The model year groups are:

- 2007 or newer
- 2004-06
- 1998-2003
- 1994-97
- 1990-93
- Pre-1990

While new emission standards are in effect for model year 2010 and newer trucks, a new category was not designated for these newer trucks because few of them were identified during the survey (approximately 1% of the surveyed trucks were model year 2010 or 2011).

The average visit frequency categories are:

- 15 or more visits per week (average of 3 visits or more per day)
- From 7 to 15 visits per week (average of 1.4 to 3 visits per day)
- From 5 to 7 visits per week (average of 1 to 1.4 visits per day)
- From 2.5 to 5 visits per week (average of one visit every other day to one visit per day)
- Less than 2.5 visits per week (less than one visit every other day)
Figure 2.1 illustrates the percentage of trucks of each model year from the survey sample of trucks visiting the Port Authority terminals. The highest percentage (most common) model year is 2000, accounting for 11% of trucks surveyed. The average and median model years are also 2000 (ten years old). The median value reflects the age at which half of trucks are older and half are newer.

**Figure 2.1: Model Year Distribution of Trucks Visiting the Port Authority Terminals**

![Model Year Distribution Chart](chart.png)

Figure 2.2 presents the percentage of owner-operated trucks in each model year, which made up approximately two-thirds (61%) of the sampled trucks, while the same information is displayed in Figure 2.3 for the trucks driven by other than the owners (employees or contract drivers). These two figures indicate that a relatively large percentage of trucks newer than 2003 are not owner-driver trucks, but rather are likely to be fleet vehicles.
Figure 2.2: Model Year Group Distribution of Owner-Driven Trucks

Figure 2.3: Model Year Distribution of Trucks Driven by Other than Owner
2.2 Population Estimates

The number of trucks in each model year group was estimated using reported frequency of visits to Port Authority terminals and the estimated total number truck visits per week. Visit frequencies were divided into five groups, ranging from the frequently visiting group of trucks making 15 or more trips to a Port Authority terminal per week (an average of three trips per day) to the least frequently visiting group averaging fewer than 2.5 visits per week (making, on average, less than one visit every other day). Table 2.1 and Figure 2.4 illustrate the estimated number of trucks in each model year and visit frequency group. The table illustrates an estimated 1,874 trucks, for example, in the 7 to 15 visit-per-week group, with 124 of those being model year 2007 or newer and only 12 being older than model year 1990. An explanation of the steps taken in developing the population estimates is included in Appendix B.

Table 2.1: Distribution of Model Year and Visit Frequency Groups

<table>
<thead>
<tr>
<th>Visits per Week:</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>Model year ranges:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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<td>124</td>
<td>62</td>
<td>145</td>
<td>158</td>
<td>543</td>
</tr>
<tr>
<td>2004-2006</td>
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<td>670</td>
<td>735</td>
<td>1,131</td>
<td>3,920</td>
</tr>
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<td>473</td>
<td>163</td>
<td>277</td>
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<td>1,859</td>
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<tr>
<td>1990-1993</td>
<td>50</td>
<td>44</td>
<td>31</td>
<td>36</td>
<td>105</td>
<td>267</td>
</tr>
<tr>
<td>Pre-1990</td>
<td>35</td>
<td>12</td>
<td>23</td>
<td>0</td>
<td>53</td>
<td>123</td>
</tr>
<tr>
<td>Totals</td>
<td>1,031</td>
<td>1,874</td>
<td>1,285</td>
<td>1,519</td>
<td>2,788</td>
<td>8,496</td>
</tr>
</tbody>
</table>

Figure 2.4: Distribution of Model Year and Visit Frequency Groups
To focus in more closely on the trucks that most often visit Port Authority terminals, the groups representing trucks that visit five or more times per week (on average at least once per day, represented by columns two, three, and four in Table 2.1) were consolidated and evaluated. Table 2.2 summarizes the estimated number and percentage of these trucks in each model year group, as well as the overall population estimates for each model year group. The percentages do not add precisely to 100% because of rounding. Figure 2.5 presents the frequent truck information graphically, whereas the overall distribution by age group is presented in Figure 2.6.

Table 2.2: Estimated Population Distribution of Frequently Calling Trucks and All Trucks

<table>
<thead>
<tr>
<th>Model Year Ranges</th>
<th>Frequently Calling</th>
<th>All Trucks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimated Population</td>
<td>Estimated Percentage</td>
</tr>
<tr>
<td>2007 or newer</td>
<td>241</td>
<td>5.8%</td>
</tr>
<tr>
<td>2004-2006</td>
<td>774</td>
<td>18.5%</td>
</tr>
<tr>
<td>1998-2003</td>
<td>2,054</td>
<td>49.0%</td>
</tr>
<tr>
<td>1994-1997</td>
<td>924</td>
<td>22.1%</td>
</tr>
<tr>
<td>1990-1993</td>
<td>126</td>
<td>3.0%</td>
</tr>
<tr>
<td>Pre-1990</td>
<td>70</td>
<td>1.7%</td>
</tr>
<tr>
<td>Totals</td>
<td>4,189</td>
<td>100%</td>
</tr>
</tbody>
</table>

Figure 2.5: Estimated Population Distribution of Frequently Visiting Trucks
In developing the population estimates described above and detailed in Appendix B, estimates were developed of the number of visits per week by trucks in each model year range and visit frequency group. This information is presented below in Table 2.3 and Figure 2.7.

**Table 2.3: Number of Visits per Week by Model Year Group and Visit Frequency Group**

<table>
<thead>
<tr>
<th>Model year ranges:</th>
<th>Visits per Week: 15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007 or newer</td>
<td>1,126</td>
<td>1,247</td>
<td>322</td>
<td>483</td>
<td>241</td>
<td>3,419</td>
</tr>
<tr>
<td>2004-2006</td>
<td>2,856</td>
<td>3,017</td>
<td>1,730</td>
<td>1,086</td>
<td>1,046</td>
<td>9,734</td>
</tr>
<tr>
<td>1998-2003</td>
<td>9,653</td>
<td>9,211</td>
<td>3,459</td>
<td>2,454</td>
<td>1,730</td>
<td>26,506</td>
</tr>
<tr>
<td>1994-1997</td>
<td>5,953</td>
<td>4,746</td>
<td>845</td>
<td>925</td>
<td>1,006</td>
<td>13,474</td>
</tr>
<tr>
<td>1990-1993</td>
<td>1,046</td>
<td>442</td>
<td>161</td>
<td>121</td>
<td>161</td>
<td>1,931</td>
</tr>
<tr>
<td>Pre-1990</td>
<td>724</td>
<td>121</td>
<td>121</td>
<td>0</td>
<td>80</td>
<td>1,046</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>21,358</strong></td>
<td><strong>18,784</strong></td>
<td><strong>6,637</strong></td>
<td><strong>5,068</strong></td>
<td>4,264</td>
<td><strong>56,110</strong></td>
</tr>
</tbody>
</table>
2.3 Other Findings

This subsection details the results of additional questions asked of the drivers regarding their practices and experiences related to operating on the terminals. These results are reported with the expectation that the information may prove useful in evaluating trucking activity associated with the Port Authority marine terminals.

State of Registration, Truck Manufacturer, and Weight Rating

The state of registration, manufacturer, and gross vehicle weight rating (GVWR) of each truck was recorded on the survey forms. Not surprisingly, the most common state of registration was New Jersey, with 80% of trucks having a license plate from New Jersey, followed by New York at 11% and various other states and Canadian provinces accounting for 2% or less each.

Figure 2.8 illustrates the distribution of registration states — the “Other” category includes less than one percent each from Connecticut, Delaware, Florida, Georgia, Massachusetts, Maryland, Maine, Michigan, Minnesota, North Carolina, New Hampshire, Ohio, Rhode Island, Tennessee, Virginia, Vermont, and Wisconsin in the U.S., plus trucks licensed by the U.S. Postal Service.
Figure 2.8: Percentage Distribution of Registration States

Figure 2.9 illustrates the percentage distribution of truck manufacturers. The most commonly seen drayage truck manufacturer was Freightliner, with 40% of the trucks sampled, followed by Volvo and Mack at 16% and 14% each, respectively. Kenworth, International, and Peterbilt were represented at between 7 and 11% each, and other makes accounted for 3%.

Figure 2.10 illustrates the distribution of trucks from the various manufacturers in terms of the model year groups introduced earlier. Some truck brands are more common among the older trucks, which may reflect a combination of changing market share and differences in longevity between trucks from different manufacturers.
Figure 2.9: Percentage Distribution of Drayage Truck Manufacturers

Figure 2.10: Percentage Distribution of Trucks by Manufacturer within Model Year Group
Regardless of manufacturer, the drayage trucks surveyed were overwhelmingly rated at 80,000 pounds GVWR, putting them in the largest on-road vehicle emissions modeling category, designated HDDV8B in the EPA's MOBILE model. Approximately 95% of the trucks for which weight rating was obtained were in this largest category.

Reason for terminal visit
Drivers were asked whether they had come to the terminal to pick up a container, drop off a container, or both. Two-way hauls, where one visit to a terminal accounts for an incoming container and a departing container, are more efficient than one-way hauls, in which a driver either picks up or drops off a container, and makes one leg of the trip without making a cargo or container move. Figure 2.11 illustrates the breakdown of one-way and two-way hauls by percentage, and shows that just over half (51%) of visits were two-way hauls, while one-way hauls for drop-off were much more common than for pick-up (34% drop-off, 15% pick-up).

Figure 2.11: Percentages of One-Way and Two-Way Hauls
The Port Authority of New York and New Jersey
Drayage Truck Characterization Survey
at the Port Authority Marine Terminals

Appendix A – Survey Form - 2010

Section 1	 Complete as much of this background section as possible before approaching drivers

Date_________ Time_______ AM / PM Surveyor Initials _____________________________

Survey Location _______________________________________________________________

Truck License Plate #_________ State_____

Make of Truck (circle one): Freightliner Volvo Mack Peterbilt International Kenworth
Other: ____________________________

Truck Config. (Circle One): Tractor only Trailer w/Empty Chassis Trailer w/Container on Chassis

Gross vehicle weight rating (GVWR) ________________________ (in pounds, on door of truck)

Intro (to drivers): Good morning/afternoon. We are conducting a survey of truck travel for the Port
Authority. The information you provide will be used to estimate regional truck travel patterns and
age distributions from trucks visiting the port. The interview should take no longer than two
minutes of your time and your responses will be kept confidential.

Section 2	 Truck and Terminal Information

What is the model year of the truck? ____________ If not known – prompt for model year range:


Are you an owner/operator of this truck (check one)?
Yes____ No____

If not, is this the truck that you are typically assigned to (check one)?
Yes____ No____

In a typical week, how often do you visit any container terminal at the Port
(including pick-ups and drop-offs)? ____________

If less than once per week, how many visits per month?

Are you here to: drop off?______ pick up?______ both?______

Thank you for your participation and cooperation.
Appendix B - Population Estimation Methodology

**Step 1:** Distribute sample trucks according to model year group and visit frequency group (structured as in Table 2.1 in text).

<table>
<thead>
<tr>
<th>Model year ranges</th>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007 or newer</td>
<td></td>
<td>28</td>
<td>31</td>
<td>8</td>
<td>12</td>
<td>6</td>
<td>85</td>
</tr>
<tr>
<td>2004-06</td>
<td></td>
<td>71</td>
<td>75</td>
<td>43</td>
<td>27</td>
<td>26</td>
<td>242</td>
</tr>
<tr>
<td>1998-2003</td>
<td></td>
<td>240</td>
<td>229</td>
<td>86</td>
<td>61</td>
<td>43</td>
<td>659</td>
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<tr>
<td>1994-97</td>
<td></td>
<td>148</td>
<td>118</td>
<td>21</td>
<td>23</td>
<td>25</td>
<td>335</td>
</tr>
<tr>
<td>1990-93</td>
<td></td>
<td>26</td>
<td>11</td>
<td>4</td>
<td>3</td>
<td>4</td>
<td>48</td>
</tr>
<tr>
<td>Pre 1990</td>
<td></td>
<td>18</td>
<td>3</td>
<td>3</td>
<td>0</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td></td>
<td></td>
<td>531</td>
<td>467</td>
<td>165</td>
<td>126</td>
<td>106</td>
<td>1,395</td>
</tr>
</tbody>
</table>

**Step 2:** Calculate the percentage of each model year and visit frequency group relative to the total sample.

<table>
<thead>
<tr>
<th>Model year ranges</th>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007 or newer</td>
<td></td>
<td>2.0%</td>
<td>2.2%</td>
<td>0.6%</td>
<td>0.9%</td>
<td>0.4%</td>
<td>6.1%</td>
</tr>
<tr>
<td>2004-06</td>
<td></td>
<td>5.1%</td>
<td>5.4%</td>
<td>3.1%</td>
<td>1.9%</td>
<td>1.9%</td>
<td>17.3%</td>
</tr>
<tr>
<td>1998-2003</td>
<td></td>
<td>17.2%</td>
<td>16.4%</td>
<td>6.2%</td>
<td>4.4%</td>
<td>3.1%</td>
<td>47.2%</td>
</tr>
<tr>
<td>1994-97</td>
<td></td>
<td>10.6%</td>
<td>8.5%</td>
<td>1.5%</td>
<td>1.6%</td>
<td>1.8%</td>
<td>24.0%</td>
</tr>
<tr>
<td>1990-93</td>
<td></td>
<td>1.9%</td>
<td>0.8%</td>
<td>0.3%</td>
<td>0.2%</td>
<td>0.3%</td>
<td>3.4%</td>
</tr>
<tr>
<td>Pre 1990</td>
<td></td>
<td>1.3%</td>
<td>0.2%</td>
<td>0.2%</td>
<td>0.0%</td>
<td>0.1%</td>
<td>1.9%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>38.1%</td>
<td>33.5%</td>
<td>11.8%</td>
<td>9.0%</td>
<td>7.6%</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

**Step 3:** Estimate total number of truck visits in 2007 (last year for which a full year of throughput information was available) by dividing 2006 truck visits by 2006 container throughput to calculate average number of truck visits per container (1.03 visits per container) and multiplying that factor by the 2007 total container throughput to estimate the total number of truck visits in 2007.

3,025,379 2008 container truck visits to terminals in Newark, Elizabeth, Staten Island (from 2006 HDDV emissions inventory data collection)

2,699,800 2008 container throughput, same terminals (from Port Authority records)

1.12 truck per container ratio (number of trucks divided by number of containers)

2,603,716 2009 container throughput, all container terminals (most recent full year)

2,917,708 estimated 2009 container truck visits (2009 container throughput multiplied by truck per container ratio)

**Step 4:** Estimate weekly truck visits by dividing annual number of visits by 52 weeks/year average work schedule.

56,110 Visits per week

---

Starrcest Consulting Group, LLC

B-1

31 December 2010
Appendix B – Population Estimation Methodology (contd)

**Step 5:** Distribute weekly truck visits into model year and frequency groups by multiplying each group's percentage (Step 2) by the estimated weekly total number of visits (Step 4). The format of this distribution is again similar to that of Table 2.1 but contains the estimated total number of visits in each group rather than the estimated number of individual trucks.

<table>
<thead>
<tr>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
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<tbody>
<tr>
<td>Model year ranges</td>
<td></td>
<td></td>
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<td>9,734</td>
</tr>
<tr>
<td>1998-2003</td>
<td>9,653</td>
<td>9,211</td>
<td>3,459</td>
<td>2,454</td>
<td>1,730</td>
<td>26,506</td>
</tr>
<tr>
<td>1994-97</td>
<td>5,933</td>
<td>4,746</td>
<td>845</td>
<td>925</td>
<td>1,006</td>
<td>13,474</td>
</tr>
<tr>
<td>1990-93</td>
<td>1,046</td>
<td>442</td>
<td>161</td>
<td>121</td>
<td>161</td>
<td>1,931</td>
</tr>
<tr>
<td>Pre 1990</td>
<td>724</td>
<td>121</td>
<td>121</td>
<td>0</td>
<td>80</td>
<td>1,046</td>
</tr>
<tr>
<td>All visits per week</td>
<td>21,358</td>
<td>18,784</td>
<td>6,637</td>
<td>5,068</td>
<td>4,264</td>
<td>56,110</td>
</tr>
</tbody>
</table>

**Step 6:** Determine the average number of visits per week of each visit frequency group from the survey data. For example, the average number of visits per week of the trucks in the "15 or more" visit frequency group ranged from 15 to 50 visits per week, with an average of 19.1 visits per week.

**Average visits/week per truck**

<table>
<thead>
<tr>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007 or newer</td>
<td>20.7</td>
<td>10.0</td>
<td>5.2</td>
<td>3.3</td>
<td>1.5</td>
<td>12.3</td>
</tr>
<tr>
<td>2004-06</td>
<td>1.031</td>
<td>1.874</td>
<td>1.285</td>
<td>1.519</td>
<td>2,788</td>
<td>8,496</td>
</tr>
</tbody>
</table>

**Step 7:** Estimate the total number of individual trucks in each frequency group by dividing the estimated number of visits in each frequency group (Step 5) by the average number of visits per week of that group (Step 6). (visits/week divided by visits/week/truck equals number of trucks).

<table>
<thead>
<tr>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td># of trucks - all MY</td>
<td>1,031</td>
<td>1,874</td>
<td>1,285</td>
<td>1,519</td>
<td>2,788</td>
<td>8,496</td>
</tr>
</tbody>
</table>

**Step 8:** Calculate the percentage of each age group within each frequency group relative to the sample population within each frequency group (similar to Step 2 but within each frequency group rather than related to the sample as a whole).

<table>
<thead>
<tr>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>Model year ranges</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2007 or newer</td>
<td>5.3%</td>
<td>6.6%</td>
<td>4.8%</td>
<td>9.5%</td>
<td>5.7%</td>
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</tr>
<tr>
<td>2004-06</td>
<td>13.4%</td>
<td>16.1%</td>
<td>26.1%</td>
<td>21.4%</td>
<td>24.5%</td>
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</tr>
<tr>
<td>1998-2003</td>
<td>45.2%</td>
<td>49.0%</td>
<td>52.1%</td>
<td>48.4%</td>
<td>40.6%</td>
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</tr>
<tr>
<td>1994-97</td>
<td>27.9%</td>
<td>25.3%</td>
<td>12.7%</td>
<td>18.3%</td>
<td>23.6%</td>
<td></td>
</tr>
<tr>
<td>1990-93</td>
<td>4.9%</td>
<td>2.4%</td>
<td>2.4%</td>
<td>2.4%</td>
<td>3.8%</td>
<td></td>
</tr>
<tr>
<td>Pre 1990</td>
<td>3.4%</td>
<td>0.6%</td>
<td>1.8%</td>
<td>0.0%</td>
<td>1.9%</td>
<td></td>
</tr>
<tr>
<td>All</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td>100.0%</td>
<td></td>
</tr>
</tbody>
</table>

**Step 9:** Estimate the number of trucks in each model year and frequency group by multiplying the estimated number of trucks in each frequency group (Step 7) by the percentage of each age group within each frequency group (Step 8). These final values are presented below and in Table 2.1.

<table>
<thead>
<tr>
<th>Frequency Ranges</th>
<th>15 or more</th>
<th>7 - &lt;15</th>
<th>5 - &lt;7</th>
<th>2.5 - &lt;5</th>
<th>less than 2.5</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>Model year ranges</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2007 or newer</td>
<td>54</td>
<td>124</td>
<td>62</td>
<td>145</td>
<td>158</td>
<td>543</td>
</tr>
<tr>
<td>2004-06</td>
<td>138</td>
<td>301</td>
<td>335</td>
<td>325</td>
<td>684</td>
<td>1,783</td>
</tr>
<tr>
<td>1998-2003</td>
<td>465</td>
<td>919</td>
<td>670</td>
<td>735</td>
<td>1,131</td>
<td>3,020</td>
</tr>
<tr>
<td>1994-97</td>
<td>287</td>
<td>473</td>
<td>163</td>
<td>277</td>
<td>657</td>
<td>1,859</td>
</tr>
<tr>
<td>1990-93</td>
<td>50</td>
<td>44</td>
<td>31</td>
<td>36</td>
<td>105</td>
<td>267</td>
</tr>
<tr>
<td>Pre 1990</td>
<td>35</td>
<td>12</td>
<td>23</td>
<td>0</td>
<td>53</td>
<td>123</td>
</tr>
<tr>
<td>Totals</td>
<td>1,031</td>
<td>1,874</td>
<td>1,285</td>
<td>1,519</td>
<td>2,788</td>
<td>8,496</td>
</tr>
</tbody>
</table>

*Starrett Consulting Group, LLC*  
*31 December 2010*
Growing communities where all families thrive.

- ACCION International
- ACCION USA
- United States Environmental Protection Agency
- Tetra Tech, Inc
- Gladstein, Neandross and Associates
- TIAx

If there are fees associated with completing this request, I agree to pay all reasonable fees. If any part of this request is denied, please provide the specific statutory exemption(s) and complete the remainder of the request.

Please do not hesitate to contact me by phone at (206) 568-5000 x16 or by e-mail at david@pugetsoundsage.org if you have any questions or concerns about this request.

Thank you very much for your assistance.

Sincerely,

David B. Mendoza
Research and Policy Analyst
October 6, 2010

Attention: Public Information Officer
Port Authority of New York and New Jersey
225 Park Avenue South
New York, NY 10003

Re: Public Records Request on Truck Replacement Program

To Whom It May Concern:

On behalf of Puget Sound Sage, I am writing to request the disclosure of records pursuant to the New Jersey Open Public Records Act and the New York State Freedom of Information Law. Please promptly provide copies of the documents requested herein, as required by the above named laws. This request relates to the Port Authority of New York and New Jersey (PANYNJ) Truck Replacement Program.

Please provide any and all records and correspondence associated with applications submitted by port drivers to participate in the Truck Replacement Program, including any loan, purchase or other agreements executed with port drivers. Records should include, but not necessarily be limited to:

- Total number of applicants
- Total number of executed agreements
- Total number of trucks provided under executed agreements
- VIN Numbers and owners names for all trucks purchased under agreements
- VIN Numbers and owners names for all trucks scrapped under agreements
- Loan/lease agreements
- Status of each application
- Description and administrative process of the revolving loan fund
- Administrators of the revolving loan fund

In addition, please produce all records, any and all correspondence, and any drafts thereof, reflecting, including, identifying, mentioning, referring to, relating to, discussing, describing, reporting, comprising, listing, or analyzing the Port Authority of New York and New Jersey’s Truck Replacement Program within the last 24 months between the members of staff of the PANYNJ and employees, agents, or representatives of the Truck Replacement Center, including representatives of the following:
• A report on the implementation of the Sticker Program including a field report from the Port Authority Police Department on actual or predicted program implementation, training methods and results and other data related to the Sticker Program

Thank you in advance for your timely response to this request and for your efforts on behalf of the economy and environment of our region. I look forward to hearing from you, and to continuing to work with you toward our shared goals of an efficient and sustainable working waterfront.

Sincerely,

Brad Lander

cc: Richard Larabee, Director, Port Commerce
    Kara Hughes, External Relations
April 18, 2011

Chris Ward
Executive Director
Port Authority of New York and New Jersey
225 Park Avenue South
New York, NY 10003

Dear Executive Director Ward:

I am writing to continue our on-going dialogue about how to improve the environmental performance of our working waterfront.

First, I want to thank you for your personal leadership, and the commitment of substantial resources by your agency, to the build-out of cold ironing technology at the Brooklyn Cruise Terminal, which as you know, will be the first place on the East Coast that major vessels can use grid-delivered electricity. This project will lessen the environmental burden of port facilities on surrounding communities and help catalyze future cold ironing projects around the harbor, like the proposed expansion of Howland Hook and the Manhattan Cruise Terminal. I thank you for your leadership and efforts to bring this project to the implementation stage.

In the spirit of continuing our work together to reduce port-related air pollution, I would like to request information regarding the recent performance of Port Authority’s Clean Truck Program.

As you also know, I recently sponsored NY City Council Resolution 414-2010 – which passed the City Council on November 17, 2010 and urges the Port Authority to implement an environmentally sustainable, economically sound clean truck program modeled after the Port of Los Angeles, and further calls on Congress to pass the Clean Ports Act of 2010.

It is my understanding that the Port Authority has recently undertaken a series of measures intending to address some of the shortcomings in the port trucking industry, including the Drayage Truck Registry, Truck Replacement Program and sticker enforcement program. I respectfully request an update on the performance of these programs, including:

- A report on the Drayage Truck Registry including: number and characterization of registrants, number and type of stickers distributed, and other data related to the program;

- A report on the Truck Replacement Program including number of applicants, number of trucks purchased, number of trucks scrapped, amount of funds expended, number of denied or incomplete applicants, method for qualification (risk assessment), total cost of contracts and other data related to this program;
To All,

I am very pleased to inform you that the Port Authority received an approval yesterday from EPA Region II to expand the eligibility criteria of the Truck Replacement Program to allow for the inclusion of any drayage truck that has a model year engine 2003 or older in the Program. All requirements for qualifying applicants to receive Grant funding and Low Interest Loan incentive funds, if applicable, would continue to be the same (Number of frequent calls, Registration, Insurance, Credit scores, etc.).

I know that there were some owners who had trucks equipped with model year 1994 through 2003 engines, that were interested in the Program and applied to receive funding, but did not qualify to receive it under the Original Program. I would like to ask team members to go back and check our records for those owners that were not qualified before and get them to start the process of acquiring newer trucks. We have until September 30th 2011 to disburse funding for this Program.

We cannot appreciate EPA Region II staff and every team member listed in this message enough for your proactive role and hard work to ensure successful implementation of this Program. Also, special thanks to Joe Ray from Starcrest for his continuous help and support.

Regards,

Atef Ahmed, P.E., P.G.
Manager, Environmental Programs
Port Commerce Department, 11th Floor
The Port Authority of New York & New Jersey
225 Park Avenue South,
New York, NY 10003
Ph. 212-435-4271
Fax. 212-435-4399
Information:

First Name: Theodore
Last Name: Claassen Jr.
Company: Paradigm Energy Group
Mailing Address 1:
Mailing Address 2:
City:
State:
Zip Code:
Email Address:
Phone:

List of specific record(s):
Paradigm Energy Group "PEG" requests, from the Port Authority of New York and New Jersey, a complete electronic copy of the Drayage Truck Registry as of March 2, 2011. PEG is not seeking personal information such as driver's names and phone numbers, but rather information including, but not limited to the SCAC Code, Truck Make, Truck Model, Truck Year, Fuel Type, State of Registration, Engine Model Year, and Engine Family Name of every registered user. PEG's goal is to analyze this list so that it may help the Ports goal of "not only cleaner air for you and for the surrounding communities in the port district, but an efficient, sustainable port well-equipped to handle future cargo growth." Thank you for your help in this matter.
Information:

First Name: Theodore
Last Name: Claassen
Company: Paradigm Energy Group
Mailing Address 1:
Mailing Address 2:
City: Scottsdale
State:
Zip Code:
Email Address:
Phone:
Required copies of the records: Yes

List of specific record(s):
The Clean Air Strategy CAS refers to a 9.8 Million Dollar EPA Grant, a 1.8 Million Dollar NJPTA Grant, and a 7 Million Dollar Federal Grant. Collectively, the Grants. Paradigm Energy Group would like the specific records which show 1 how much money is left from each of the Grants and 2 whom has received funding under each of the Grants as of January 10, 2011. CAS further references a 2 Million Dollar Emission Reduction Fund the Fund. Paradigm Energy Group would like the specific records which show 1 how much money is left in the Fund and 2 whom has received funding under the Fund as of January 10, 2011. In connection with the Grants and Fund, Paradigm Energy Group would also like the specific applications for each so that it may apply. Thank you so much, Theodore TJ Claassen Vice President of Business Development Paradigm Energy Group.
<table>
<thead>
<tr>
<th>READING LINE</th>
<th>CLASSIFICATION 1</th>
<th>LINE 2</th>
</tr>
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<tbody>
<tr>
<td>Worthington blitzers (see)</td>
<td>P Equipment Automotive</td>
<td>Mowers</td>
</tr>
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<td>Wrecker trucks, Automotive equipment</td>
<td>P Equipment Automotive</td>
<td>Trucks Wrecker</td>
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<td>Wrenches, Tools</td>
<td>P Equipment Tools</td>
<td>Wrenches</td>
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<td>X ray equipment, Medical</td>
<td>P Equipment Medical</td>
<td>X Ray</td>
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<td>X ray xerox copier machines, Office machines</td>
<td>P Equipment Office machines</td>
<td>Xerox</td>
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<td>X rays, Construction materials</td>
<td>P Construction Materials</td>
<td>X Rays</td>
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<td>P Zoning City maps</td>
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<td>Zoning interference</td>
<td>P Zoning Interference</td>
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<td>Zoning variance applications</td>
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Wired music (see)
Withdrawals (see also)
Withdrawals, Retirement insurance terminations
Withdrawals, Retirement insurance terminations (see also)
Withheld salary increases
Withholding (see also)
Withholding tax salary deductions
Withholding tax salary deductions (see also)
Women toll collectors uniforms
Women wear apparel shops
Wood bits, Tools
Work clothes (see)
Work control program
Work measurement job study
Work orders, Maintenance
Work orders, Non routine maintenance
Work orders, Routine maintenance
Work papers internal audits, Accounts
Work papers, Accounts
Work papers, Population census survey
Work papers, Space units surveys
Work platforms, Appurtenances
Work scheduling, Maintenance crews
Work uniform services
Working hours
Working hours, Staggered
Workmen's (see also)
Workmen's compensation insurance
Workmen's compensation insurance (see also)
Workmen's compensation salary deductions
Workmen's passes, Protection
Workshops, Space units (see)
Workstands, Appurtenances (see)
World maps, Equipment

P Systems Communicating
I Personnel Programs
F Insurance Retirement
F Insurance Retirement
I Salaries Increases
I Salaries Special compensation
I Salaries Deductions
I Salaries Deductions
P Equipment Uniforms
P Tenants Prospective
P Equipment Tools
P Equipment Uniforms
P Maintenance Program
I Jobs Studies
P Maintenance Work orders
P Maintenance Work orders
P Maintenance Work orders
F Accounts Audits
F Accounts Work papers
F Economics Studies/Surveys
P Space units Studies/surveys
P Appurtenances Platforms
P Maintenance Crews
A Services Uniforms
I Time Working hours
I Time Working hours
I Personnel Programs
F Insurance Workmen's compensation
I Personnel Programs
I Salaries Deductions
S Protection Passes
P Space units Stores
P Appurtenances Platforms
P Equipment Maps

Public address
Insurance Retirement
Terminations
Terminations
Withheld
Fica pickup
Withholding tax
Withholding tax
Toll collectors
Auxiliary Svcs Apparel shops
Wood bits
Work control
Work measurement
Non routine
Routine
Internal Work papers
Population Census Work papers
Work papers
Work
Scheduling
Staggered
Insurance Workmen's comp
Insurance Workmen's comp
Workmens compensation
Workmen
Work
World
READING LINE

Welding workshops, Space units
Welding, Carriers servicing
Welding, Machine equipment
Welding, Maintenance
Welfare
Welfare activities
Welfare activities (see)
Wet standpipe systems
Wharf usage charges (see)
Wharves (see)
Wheel skid resisters machine equipment
Wheelbarrows, Handling equipment
Whistle, Emergency alarms
Whistles, Police equipment
Whitewash, Construction finishes
Whitening plane transfers, Handling equipment
Widenings, Groundways
Winch houses, Appurtenances
Winches, Handling equipment
Wind compasses, Instruments
Wind cones, Instruments
Wind data, Weather
Wind emergencies
Wind energy
Wind gauges (see)
Wind insurance
Wind rose, Instruments
Wind socks (see)
Wind tees, Instruments
Wind tunnels, Structures
Window cleaning appliance, Maintenance equipment
Window screens, Protective equipment
Window sills, Appurtenances
Windows, Appurtenances
Winterizing, Maintenance

CLASSIFICATION 1

P Space units Shops
TR Carriers Servicing
P Equipment Machines
P Maintenance Welding
I Welfare
I Welfare Activities
I Personnel Programs
P Systems Standpipes
TR Carriers Handling
P Structures Piers
P Equipment Machines
P Equipment Handling
S Emergencies Alarms
P Equipment Police
P Construction Finishes
P Equipment Handling
P Groundways Widenings
P Appurtenance Winch houses
P Equipment Handling
P Equipment Instruments
TR Weather Wind
S Emergencies Wind
P Energy Wind
P Equipment Instruments
P Equipment Instruments
P Equipment Instruments
P Structures Wind tunnels
P Equipment Protective
P Equipment Protective
P Appurtenances Sills
P Appurtenances Windows
P Maintenance Winterizing

LINE 2

Welding
Welding
Welding
Employee activities
Wet
Wharfage Fees
Wheel skid resisters
Wheelbarrows
Whistle
Whistles
Whitewash
Whitening plane transfers
Winches
Wind compasses
Wind cones
Data
Anemometers
Wind rose
Wind cones
Wind tees
Window cleaning appliance
Screens
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<td>Waterway closings</td>
<td>P Equipment Uniforms</td>
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<td>Waterways financial aid</td>
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<td>P Space units Refueling</td>
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Radiograms, Communications
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Rags, Maintenance equipment
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Rail tariffs (see also)
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Railroad equipment
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Rails, Construction materials
Rails, Railroad equipment
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Raising equipment (see)
Ramp parking areas, Space units (see)
Ramphouses, Structures
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Ramps, Appurtenances
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Rape, Protection
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A Publicity Radio
S Dangerous articles Radioactive materials
A Communications Radiograms
P Equipment Marine
P Equipment Maintenance
TR Carriers Rail
TR Mail Rail
TR Passengers Rail
TR Shipments Rail
TR Carriers Rails
F Tariffs
TR Travel Rail
TR Carriers Rapid
P Appurtenances Hand rails
P Equipment Railroad
TR Carriers Rails
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P Equipment Railroad
P Equipment Uniforms
P Equipment Handling
P Space units Parking areas
P Structures Ramphouses
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TR Carriers Rates
TR Carriers Rates
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TR Baggage Handling

Radio
Rafts
Rags
Tariffs
TR Rail
TR Rail/bus
TR Rail
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Questionnaires, Carriers surveys
Questionnaires, Tenant relocation
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Quonset huts, Structures
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Quotations, Equipment purchases
R&I programs, Maintenance
Race tracks, Space units
Rack trucks, Automotive equipment
Racks, Appurtenances
Racks, Furniture & furnishings
Racks, Sorting (see)
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P Equipment Instruments
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A Report Quarterly
P Construction Materials
TR Passengers Surveys
TR Carriers Surveys
P Tenants Relocation
P Equipment Machines
P Structures Quonset huts
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P Equipment Purchases
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P Equipment Automotive
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P Equipment Instruments
P Equipment Instruments
P Structures Towers
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P Systems Heating
S Accident Hazards
P Equipment Plumbing
P Equipment Communicating
P Systems Communicating
P Equipment Handling
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P Space units Shops
I Personnel Licenses

Fire extingu dry chemicals
Keys
Pyrometers
Qualifying
Quarzite
Questionnaire
Questionnaire
Questionnaires
Coin changers
Quotations
Quotations
R&I
Trucks Rack
Racks
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Pumping stations, Structures
Pumps, Drainage systems
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Pumps, Sewage systems
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Purchase, Fuel (see)
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Purchases, Advertising for contracts (see)
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Purchases, Construction
Purchases, Equipment
Purchases, Finance
Purchases, Insurance
Purchases, Insurance renewals
Purchases, Publications non PA (see)
Purchases, Services
Purchases, Structures
Purchases, Systems

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Pumps
Punch card
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Purchases
Premiums
Premiums
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### SUBJECT CLASSIFICATION INDEX

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