

SECTION VIII

EPISODE PLAN

CONTINGENCY PLAN
FOR THE
PREVENTION AND CONTROL
OF
AIR POLLUTION EPISODES

TEXAS AIR CONTROL BOARD

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PREFACE

The purpose of the Air Pollution Episode Plan is to protect human life and health by preventing or eliminating dangerous levels of air pollution. The objective is to provide control both during long term air stagnation conditions and for short term and small area episodes. Flexibility and operational capability should not be reduced by procedures outlined in the plan. Personnel must act with initiative and judgement to cope with any condition that may develop.

The Texas Air Control Board (TACB) is charged with the primary responsibility for the State of Texas to insure that Air Pollution Episodes are controlled. Nothing in this plan shall be interpreted as precluding local health officials from taking appropriate action to protect the health and welfare of residents in their jurisdiction. For the purpose of coordination and continuity within the State, the Executive Director of the Air Control Board should be notified of the action. As in any local problem, it is expected that local officials will also properly inform the public and the news media. TACB will cooperate and assume the leading role in the monitoring of the control activities required for an episode.

Experience, new data, and operational requirements will dictate future revisions to this plan. Throughout this evolutionary process, every effort will be made to provide the citizens with maximum protection while avoiding unnecessary burdens and expenses.

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TEXAS CONTINGENCY PLAN FOR
PREVENTION AND CONTROL OF AIR POLLUTION EPISODES

1.0 INTRODUCTION

- A. The criteria for declaring air pollution episodes is contained in Regulation VIII of the Texas Air Control Board. Regulation VIII also specifies the control action to be taken by pollutant sources to reduce or eliminate emissions during air pollution episodes.
- B. This contingency plan describes the organizational structure and control strategies.

1.1 EPISODE POTENTIAL

- A. When meteorological conditions warrant, Air Stagnation Advisories (ASA's) are issued by the designated National Weather Service Forecast Office (WSFO). (See Map 2, Appendix C).
- B. In general terms, weather conditions conducive to air pollution episodes are as follows:
 - 1. A stationary or slow moving high-pressure weather system prevails over the area.
 - 2. There is no precipitation.
 - 3. Winds are light and variable, generally less than 7 miles per hour near the surface and relatively light aloft.
 - 4. Air in the low levels is stable, exhibiting little horizontal motion or vertical mixing.
 - 5. Temperature increases with height (inversion).
- C. An ASA, once issued, is updated or revised as necessary. The ASA may include an area as small as a single municipality and will ordinarily be issued only for conditions expected to persist for at least 24 to 36 hours. The WSFO

will notify the TACB meteorologist two hours before public issuance of the ASA. The San Antonio WSFO also prepares a daily Pollution Dispersion Data (PDD) message describing expected dispersion conditions, periods when the potential for short term high air pollution is likely, possibility of precipitation, expected wind direction and speed, and low-level sounding data. TACB will obtain the PDD and relate it to measured air quality to assist in anticipating pollution buildups. Termination of an ASA will be announced by the WSFO and TACB will be notified prior to public announcement.

2.0 DEFINITIONS

The definitions outlined in the Rules and Regulations of the Texas Air Control Board apply to this plan. Unless specifically noted or further defined, the definitions of terms in the plan will have the meanings commonly ascribed to them by recognized authorities in the air pollution field.

3.0 PROCLAMATION OF EPISODE

- A. Whenever the Executive Director of the Texas Air Control Board determines air contaminants are attaining or have attained levels which could substantially threaten human health or safety, he will declare an Air Pollution Episode. The criteria for determining a Level 1 or Level 2 Air Pollution Episode are specified in Rule 801 of Regulation VIII. The two ancillary status situations are the Air Stagnation Advisory (ASA) and Termination which are used, respectively, to initiate and terminate increased surveillance during periods of high pollution potential.
- B. An ASA need not be in effect prior to an episode being declared. Level 1 or Level 2 Air Pollution Episodes can be declared on the basis of deteriorating air quality alone. In this case, the appropriate WSFO will be notified of the deteriorating air quality. The WSFO will then issue an Air Stagnation Advisory through their communications network, which will assist in notifying the news media and public of the air pollution conditions.

4.0 ABATEMENT PLANNING

Reduction of pollutant emissions as a measure to avoid poten-

tial episodes requires coordinated action by all the sources contributing to the air pollution episode. The public must be requested to help reduce emissions by reducing transportation and keeping heating and electric loads to a minimum. Industry must have internal plans prepared if they are to achieve reductions with a minimum disruption of their production processes.

5.0 AIR POLLUTION EPISODE ACTION

This section sets forth the procedures for the operation and implementation of the Air Pollution Episode action plan. The intent is not to formulate precise and rigid procedures but to furnish an outline for the course of action required to control and terminate an air pollution episode.

5.1 TACB EMERGENCY ACTION CENTER (EAC)

- A. Routine Surveillance - During this mode, TACB will be performing normal duty assignments. If at any time there is an indication that a high air pollution potential is developing, the Executive Director will be notified immediately. During a high air pollution potential situation, a 24-hour standby for personnel of the EAC may be required.
- B. Forecast - Air Stagnation Advisory - Upon receipt of an Air Stagnation Advisory, or as data from monitoring sites indicates the potential for an air pollution episode, the following actions will be taken:
 1. Key personnel of the Emergency Action Center Staff (Appendix A) will be briefed on the situation and placed on standby status or convened if necessary.
 2. The Regional Supervisor will be notified of the situation and will in turn notify all local air pollution control agencies.
 3. State officials, interstate officials, governmental agencies, EPA, hospitals, news media, civic groups, etc., will be notified as required.
 4. Local and Regional offices will be requested to collect data on an hourly basis and report averages to the TACB Data Reduction Room at regular intervals.
 5. The TACB-EAC will maintain a log of all significant

events during the emergency episode.

6. When pollutant build-up trends so warrant, the Regional Supervisor will be requested to notify the applicable industry of the possibility of curtailment in accordance with Regulation VIII. In the interim, requests for curtailment will be on a voluntary basis and judgement as to the nature of curtailment will be by the operator/owner of the source.
7. Data and reports will be continually evaluated to determine episode potential or status.
8. Regional personnel and local agencies will be checked periodically on the status of their activities.

C. Level 1 and Level 2 Episodes.

1. Regional and local offices, state officials, governmental agencies, EPA, hospitals, news media, etc., will be notified of the episode level.
2. Continue steps 5.1.B.1 through 5.1.B.5
3. Sources of pollution will be officially notified by telephone to initiate control actions as specified in Regulation VIII, Rule 802.
 - a. Sources affected will be informed that they can call either the TACB-EAC or the Regional Office to verify the emission reduction directive.
 - b. An official copy of the emission reduction directive will be immediately mailed to each source via Special Delivery.
4. Regional and local offices will be requested to maintain close liaison and initiate the following actions:
 - a. Visit major sources of pollution to verify the EAC's official notification and assure that abatement procedures are being implemented.
 - b. Spot check minor sources where practical and encourage abatement procedures.
 - c. Report any unanticipated sources that may require specific directives from the Executive Director.

5. If non-compliance situations arise, the following enforcement action will be taken:
 - a. The Executive Director will be informed of the details of the incident and immediate legal action will be initiated.
 - b. Local enforcement officials will be requested to assist when expedient.
 6. A formal news release will be prepared for the news media to announce each change in air pollution episode status.
- D. Termination - A termination of a Level 1 or Level 2 episode will result in the next lower status being assumed. At the time an episode no longer exists, activity will revert to Routine Surveillance. All officials, news media and agencies will be notified of the end of the episode.

5.2 REGIONAL OFFICES

The Regional Office is primarily concerned with acting as a focal point for communications, administering the liaison activities with local air pollution offices, correlating the abatement strategies for emission reduction and obtaining the localized data for air quality.

- A. Routine Surveillance - Data logger tapes of air quality and meteorological data from continuous monitoring stations, and samples from non-continuous monitors, are routinely mailed to the TACB Central Office in Austin for evaluation.
- B. Forecast - Air Stagnation Advisory (ASA)
 1. Current air quality and meteorological data from the continuous monitoring stations will be reported to the TACB Data Reduction Room as soon as possible. Subsequent data will be reported to the Data Reduction Room at regular intervals and/or as requested.
 2. Appropriate local government officials and civic groups will be notified through the local air pollution control offices or directly if necessary.
 3. Activities and problems will be coordinated with the TACB-EAC in Austin.

C. Level 1 and Level 2 Episodes

1. Sampling and reporting activities will continue as in 5.2.B above. (Note: During an ASA or Routine Surveillance, if a monitoring site reports air quality data that exceeds Level 1 or Level 2 criteria, the Executive Director will be notified immediately.)
2. Industry will be notified through local air pollution control agencies, or directly if necessary, of the proclamation of each episode status and will be directed to apply the appropriate actions for curtailment as outlined in Regulation VIII.
3. Appropriate local government officials and civic groups will be contacted to verify that they have received notification of changes in episode status.
4. In coordination with local air pollution control agencies, when available, monitor compliance of industry and public in accordance with abatement strategies for emission control as outlined in Regulation VIII.
5. The effectiveness of the abatement action that is in process will be evaluated by regional personnel and reported to the TACB-EAC.
6. Activities, requests, and problems will be coordinated with TACB-EAC in Austin.

- D. Termination - Once declared, a status will remain in effect until the criteria for that level are no longer met. At such time, the next lower status will be assumed. At the time an episode no longer exists, activity will revert to Routine Surveillance. All officials and industry either directly or through the local air pollution control offices will be notified of the end of the episode.

5.3 LOCAL AIR POLLUTION CONTROL AGENCIES

Activity of local air pollution control offices, where available, should be concerned primarily with administering the abatement strategies for emission reduction and obtaining

localized air quality data. The following procedures should not be interpreted as precluding local health officials from taking appropriate action to protect the health and safety of residents in their jurisdiction. In their professional judgement and acting in their official capacity they may take any additional action they consider necessary. Local Emergency Action Centers may be established independently or in conjunction with the TACB-EAC. For the purposes of continuity within the State, the Executive Director should be notified of the establishment of such local EAC's.

- A. Routine Surveillance - Air quality samples are mailed in routinely. When equipment is available, data logger tapes of air quality and meteorological data from continuous stations will be submitted.
- B. Forecast - Air Stagnation Advisory - Upon notification that an air pollution forecast or ASA is in effect, the following action is requested:
 - 1. Air quality sample data at all continuous monitoring stations will be taken immediately and reported to the Regional Office. Note: Under certain conditions, the EAC may make arrangements to have this data reported directly to the TACB Data Reduction Room.
 - 2. Hourly averages of subsequent data will be reported at regular intervals and/or as requested.
 - 3. Appropriate local governmental officials and civic groups will be contacted to verify that they have received notification of the air stagnation advisory and subsequent changes in status.
 - 4. Activities, requests for assistance and problems will be coordinated with the Regional office and other local agencies to minimize duplication of effort, except where redundancy is desirable.
- C. Level 1 and Level 2 Episodes
 - 1. Sampling and reporting activity will continue as in 5.3.B above. (Note: During an ASA or Routine Surveillance, if a monitoring site reports air quality

data that exceeds Level 1 or Level 2 criteria, the Regional Office and TACB-EAC will be notified immediately).

2. Industry will be notified (list furnished to local agency) of the proclamation of each episode status. Owners/operators will be required to apply the appropriate actions for curtailment as outlined in Regulation VIII, Rule 802.
 3. Compliance of industry and public with abatement strategies for emission control will be monitored, evaluated and reported to the Regional Office.
- D. Termination - Once declared, a status will remain in effect until the criteria for that level are no longer met. At such time, the next lower status will be assumed. At the time an episode no longer exists, activity will revert to Routine Surveillance. All local officials and agencies will be notified of the end of the episode.

6.0 COMMUNICATIONS

- A. The Emergency Action Center established at the TACB Office will control all incoming and outgoing communication associated with the Air Pollution Episode. This will assure that the air quality and meteorological data is promptly assembled, analyzed, and disseminated to all personnel and agencies involved in the episode.
- B. During an Air Pollution Episode, TACB will establish by telephone, or by special messenger if required, communication links to state and local officials; local, state, and national agencies; Regional Supervisor; local air pollution control agencies and the news media (with prepared news releases). Routine Meteorological data will be obtained by telephone or messenger from the National Weather Service.
- C. TACB communication to agencies and personnel actively participating in the episode will be conducted by telephone. Region personnel can be assigned to local pollution control offices to perform liaison and communi-

cation functions. This will allow continuous contact with field personnel and assure prompt reporting of episode conditions.

- D. Upon termination of the episode, the EAC will prepare a post-episode report summarizing air quality data, meteorological data, source control data, and the actions taken by the agencies involved with controlling the episode.

7.0 EPISODES AFFECTING SMALL AREAS

Episodes affecting small areas, such as accidental air pollution caused by chemical spills from manufacturing or transportation accidents, or any event that causes a specified criteria level to be reached because of emissions from a limited number of sources, will be controlled on an individual basis as directed by the Executive Director.

- A. Upon the occurrence of a disaster incident such as a chemical spill involving air pollution, the EAC will coordinate the activities of the involved Air Control Region and mobilize all resources as required to provide technical advice or logistic assistance.
 - 1. Should expertise beyond the scope of air pollution control be required, the Emergency Action Center will affect coordination with the appropriate state and federal agencies to obtain the necessary assistance.
 - 2. The Emergency Action Center can also request assistance from the State Emergency Operations Center, which has at its disposal, during disasters, the facilities of all major state agencies.
- B. Each Regional Office will establish internal procedures for responding to accidental air pollution episodes. These procedures will vary from region to region, but should provide for at least the following:
 - 1. A method for recording accidental episodes and maintaining a log of actions taken in response to the incident.
 - 2. A kit containing reference materials needed when responding to accidental air pollution incidents.

3. An organized method of assigning qualified personnel to investigate the incident.
4. An organized method for assuring that communications are maintained with the TACB-EAC.

A P P E N D I X A

EMERGENCY ACTION CENTER STAFF

<u>NAME</u>	<u>PHONE EXTENSION*</u>	<u>HOME PHONE</u>
Charles R. Barden, Chairman	200	345-0271
David W. Jones, Regional Advisor	427	258-2560
Robert J. Mauel, Operations Chief	439	441-4164
John Wood, Meteorologist	225	451-4295
Rolland C. Schroeder, Meteorologist	231	837-1889
Roger Wallis, Air Quality Advisor	300	258-2816
Pam Giblin, Legal Advisor	350	453-2166
Steve Spaw, Permits Advisor	400	926-9329
Bill Harris, Source Sampling Advisor	234	327-2095
Cecil Bradford, Compliance Advisor	261	258-1722
Lou McCoy, Public Information Advisor	207	836-5289

ALTERNATE STAFF MEMBERS

Bill Stewart, Chairman	202	258-2973
Alex Opiela, Chairman	222	926-1770
Harold L. Brooks, Operations Chief	437	892-2723
Terry Echols, Meteorologist	226	454-3351
Andy Wheatley, Air Quality Advisor	320	928-0518
Doyle Pendleton, Compliance Advisor	294	451-2131
John Turney, Legal Advisor	353	836-4519
Art Kellogg, Permits Advisor	412	Elgin 285-4405

*These 3-digit extension numbers are the last three digits of the TX-AN number which starts with the digits 824-7***.

APPENDIX B

EMERGENCY ACTION CENTER ACTIVATION

The Emergency Action Center is on twenty-four hour stand-by at all times and can be activated by calling the following:

During normal office hours:

512--451-5711, Ext. 210 or 439

During other than normal office hours call in turn one of the following personnel:

Robert J. Mael 512--441-4164
Operations Chief

Harold L. Brooks 512--892-2723
Alternate Operations Chief

David W. Jones 512--258-2560
Alternate Operations Chief

George H. Coyner 512--452-0723
Alternate Operations Chief

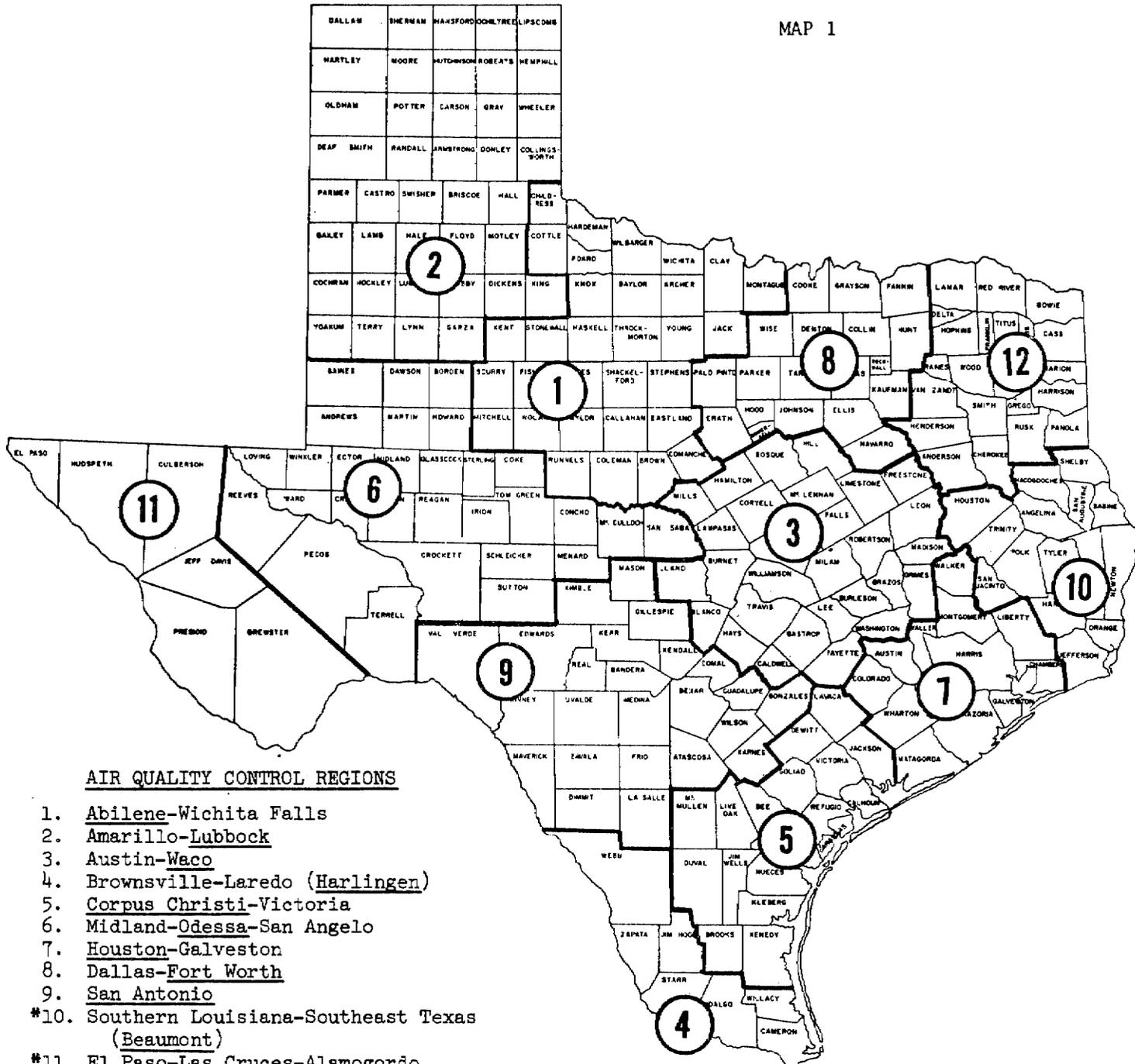
During weekend Air Stagnation Advisories, or when pollutant build-ups make it necessary to man the EAC during other than normal office hours, the following switchboard "night lines" will be connected:

Emergency Action Center 512--451-3065

Episode Data Reporting 512--451-3159

APPENDIX C
TEXAS AIR CONTROL BOARD
REGIONAL OFFICES

MAP 1



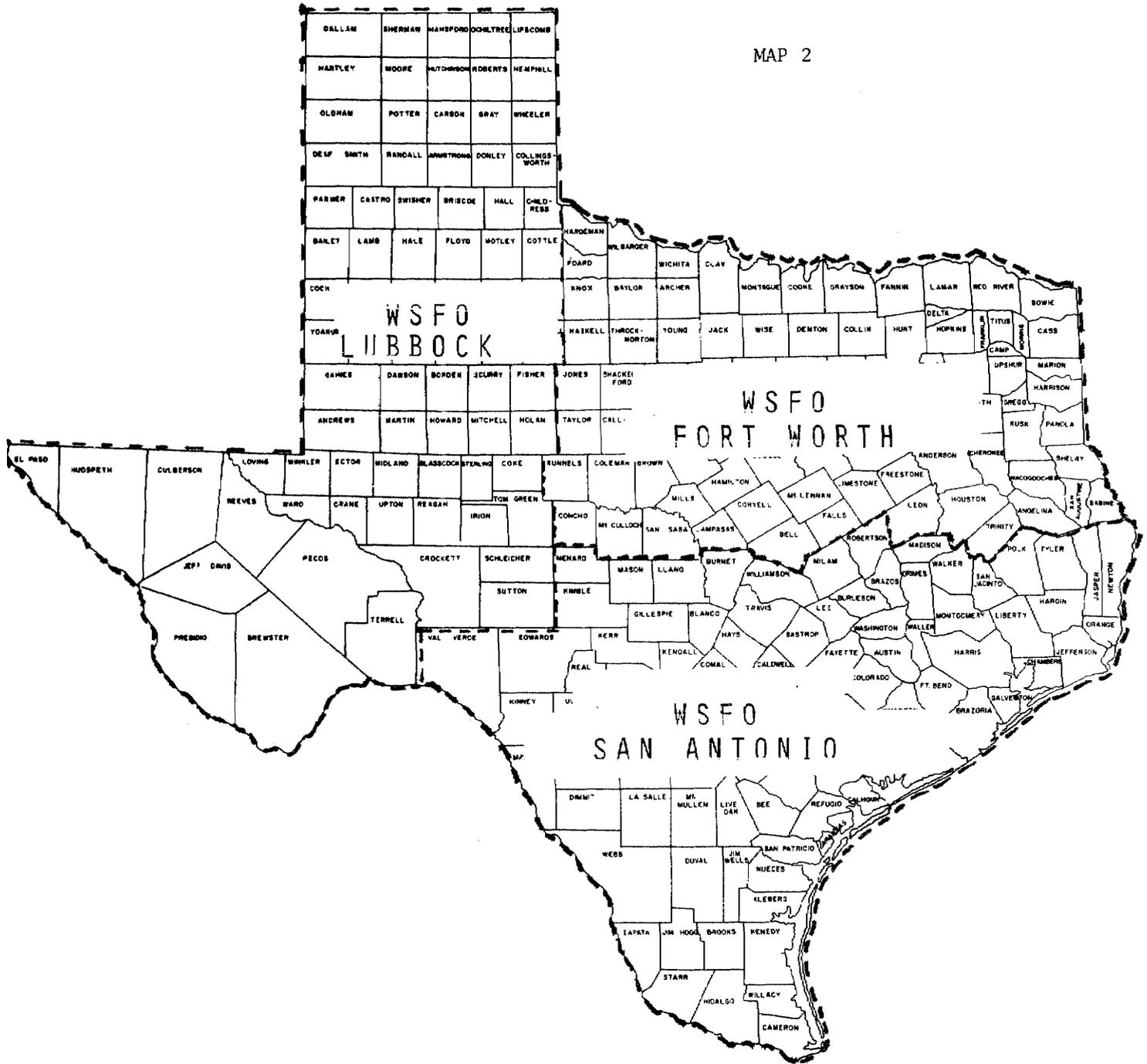
AIR QUALITY CONTROL REGIONS

1. Abilene-Wichita Falls
2. Amarillo-Lubbock
3. Austin-Waco
4. Brownsville-Laredo (Harlingen)
5. Corpus Christi-Victoria
6. Midland-Odessa-San Angelo
7. Houston-Galveston
8. Dallas-Fort Worth
9. San Antonio
- *10. Southern Louisiana-Southeast Texas (Beaumont)
- *11. El Paso-Las Cruces-Alamogordo
- *12. Shreveport-Texarkana-Tyler

* Interstate Regions
Cities where Regional Office is located is underlined.

APPENDIX C

MAP 2



APPENDIX D
SUMMARY DIAGRAM - CONTINGENCY PLAN RESPONSE

EMERGENCY ACTION PLAN CRITERIA	METEOROLOGICAL GROUP	EMERGENCY ACTION CENTER	REGION	LOCAL AGENCIES	DPS EMERGENCY OPERATIONS CENTER
STANDARD AMBIENT AIR QUALITY	Monitor overall meteorological situation. Obtain initial meteorological data at 8:30 CST daily.	Normal Duties	Normal Duties	Normal Duties	Normal Duties
FORECAST AIR STAGNATION ADVISORY (ASA)	Notify Emergency Action Center. Post data and maintain meteorological status. Brief EAC as required.	Notify EAC Staff Notify Region Supervisor. Obtain air quality report as soon as possible and at regular intervals. Evaluate data and determine status of air pollution criteria. Maintain status and log of events.	Obtain air quality data and report as soon as possible and at regular intervals. Coordinate Region and local activities with FAC.	Obtain air quality data and report as soon as possible and at regular intervals. Coordinate activities with Region.	Normal Duties
LEVEL 1 EPISODE (SEE REG. VIII)	Continue actions as outlined during Forecast level. Update data at least every 12 hours.	EAC Staff convened and briefed. Continue activities as above. Announce Episode levels. Request Region notify industry to reduce emissions as specified in Reg. VIII. Notify industry by telephone and message to reduce emissions as specified in Regulation VIII.	Continue activities as above. Notify industry to reduce emissions as specified in Reg. VIII. Notify all concerned of declaration for new level of Air Pollution Episode. Monitor and inspect emission conditions.	Continue activities as above. Notify industry in local area to comply with emission reduction directions specified in Regulation VIII. Monitor & inspect industry & local area. Coordinate activities with Region. Notify local authorities of status change.	On request of EAC, transmit message to local political subdivisions to inform them of the episode status.
LEVEL 2 EPISODE (SEE REG. VIII)	Update data at least every 6 hours.	Same as Level 1	Same as Level 1	Same as Level 1	Same as Level 1
TERMINATION	A stage is terminated when criteria for that level are no longer met. At such time, next lower status will be assumed.	Same as for meteorological group. Notify all concerned of Termination.	Same as for EAC. Notify all concerned of Termination.	Same as for EAC. Notify all concerned of Termination.	Same as for EAC. Notify all concerned of termination.

FIGURE 1