

SECTION XI

SOURCE SURVEILLANCE

XI - SOURCE SURVEILLANCE

A. GENERAL

The source surveillance system provides general procedures for:

1. Monitoring the status of compliance of all stationary emission sources in the State.
2. Detecting and initiating any necessary action to abate emissions from sources not otherwise known to the state agency.
3. Periodic testing and investigation of all stationary sources.
4. Investigating and taking necessary action with respect to complaints.
5. Enforcing rules and regulations applicable to visible emissions.
6. Automatic data processing of reports for management purposes.

B. SYSTEM CONCEPT

1. The Source Surveillance System was implemented by first listing all stationary emission sources in the state on the Source Surveillance List (SSL). This SSL is continually updated by on-site investigation of each source using the form shown in Attachment 1. This form is used to:
 - a. Determine violations of any rules or regulations.
 - b. Allow for the review of records maintained by the source as required by Rule 9, Section XIV. (May include Rule 11 in certain situations.)
 - c. Determine if visible emissions are in compliance (Rule 103, Section XIV).
 - d. Ascertain if compliance sampling is needed.
 - e. Obtain information concerning complaints.

- f. Maintain a current SSL.
- 2. The acquisition of a complete listing of all stationary emission sources in the state and the on-site investigation of those sources is a continuing dynamic program to fulfill the requirements of FR Vol. 36 No. 228, Section 51.19. Data collected is and will continue to be computerized. Software programs continue to be generated to optimize information retrieval for efficient management purposes.

C. IMPLEMENTATION

1. Source List Compilation - Sequential Actions

- a. Compilation of a list of all currently known sources.
- b. A compiled list is distributed to Local Control Programs (where they exist) and State Regional Offices.
- c. Regional and Local offices, as appropriate, verify this list by on-site inspection. Verification may result in additions, (where new sources are discovered) exemptions, (where it is evident the source has insignificant or no emissions), dead accounts, (where it is discovered the source is no longer in operation), or duplicate accounts, (when it is discovered that an account is listed more than once).
- d. The corrected verified list is forwarded to the Central Office for computerization.
- e. The computer generated list is distributed to Central, Regional, and Local offices. Updates to this list are generated quarterly and semiannually and follow the same distribution. Other meaningful and useful reports are produced quarterly and semiannually as necessary or on request.

2. Biennial Investigations - Sequential Actions

- a. Sources on the SSL are subjected to an on-site investigation not less than biennially, to determine factors outlined in B.1., a through b above.
- b. An investigation form (Attachment 1) is completed each time an investigation is made. The completed forms are forwarded to the Central Office where the information is entered into a data base and the forms

are filed.

- c. The compliance status and/or the necessity for the acquisition of additional data is determined. (Stack sampling, property line sampling, visible emissions observation, or a combination may be required.) All data are generated in accordance with procedures contained in the Compliance Sampling Manual submitted with the Implementation Plan,
- d. Computerized material will be used for management action and planning.

3. Supplemental Investigations

In addition to the biennial investigations as outlined in C.2., the following supplemental investigations are spontaneously generated:

- a. Complaint Investigation - Any investigation resulting from a complaint.
- b. Permit Investigation - Any investigation that results from some permits activity,
- c. Compliance Request - An investigation that is a direct result of a request from the Compliance Division.
- d. Progress Report - An investigation to verify the progress an account is making toward a definite schedule previously submitted, or a schedule established by court or Board order.
- e. Alternate Method - An investigation that in any way relates to alternate methods of control.
- f. Upset and Maintenance Notification - An investigation that is conducted in response to a notice of upset or maintenance conditions.
- g. Local Program Request - Any investigation conducted as the result of assistance requested by a local program.
- h. Legal Request - An investigation conducted at the request of the Legal Division to gather additional information.
- i. Visual Sighting - An investigation conducted spontaneously as the result of the visual sighting of a

possible violation.

- j. Repeat Investigation to Sample - An investigation conducted to provide additional or better sampling information.
4. Emissions data which are collected by, or reported to the State, will be correlated with applicable emission limitations and/or other measures. These data will be available to the general public at the Texas Air Control Board office during normal business hours. Rule 9 of the General Rules and Regulations provides the enforceable basis for this data including frequency of monitoring and reporting of the results of such monitoring to the State. The Texas Air Control Board is located at 8520 Shoal Creek Blvd., Austin, Texas 78758. Implementation Plans, air quality data, and emission data are also located at each Regional Office. See Page XI - 5 for addresses of these offices.

TEXAS AIR CONTROL BOARD
AIR QUALITY CONTROL REGIONS

<u>REGION</u>	<u>NAME AND ADDRESS</u>	<u>REGION</u>	<u>NAME AND ADDRESS</u>
1	Joseph E. Schindler, P.E. Regional Supervisor 1218 N. 4th, Suite 205 Abilene, Texas 79601 915--673-4768 TX-AN 840-1160	8	Melvin Lewis Regional Supervisor 3915-A Highway 377 (Benbrook Hwy.) Fort Worth, Texas 76116 817--732-5531 or 32 TX-AN 832-6268 or 69
2	John Warner, P.E. Regional Supervisor Briercroft Office Park Building 15 Lubbock, Texas 79412 806--744-0090 or 6055 TX-AN 842-4386	9	James R. Menke Regional Supervisor 4538 Centerview Dr., Suite 130 San Antonio, Texas 78228 512--734-7981 or 82 TX-AN 820-1220
3	Eugene Fulton Regional Supervisor 1512 Lake Air Dr., Suite 114 Waco, Texas 76710 817--772-9240 or 41 TX-AN 826-7293	10	Howard Baker Regional Supervisor 2900 North St. Suite 303 Beaumont, Texas 77702 713--898-3511 TX-AN 855-8227 or 28
4	Robert J. Guzman Regional Supervisor Matz Bldg., 511½ E. Jackson Harlingen, Texas 78550 512--425-6010 TX-AN 827-3290	11	Sabino Gomez Regional Supervisor 9615 Simms Drive El Paso, Texas 79925 915--591-8128 or 29 TX-AN 846-8137 or 38
5	Tom Palmer, P.E. Regional Supervisor 1305 Shoreline Blvd., Suite 124 Corpus Christi, Texas 78401 512--883-2961 TX-AN 827-6337 or 38	12	Richard Leard, P.E. Regional Supervisor 1304 South Vine Avenue Tyler, Texas 75701 214--595-2639 TX-AN 836-2295 or 96
6	Greg Short, P.E. Regional Supervisor 835 Tower Street Odessa, Texas 79760 915--337-5496, 97, or 98 TX-AN 844-9236		
7	Lloyd Stewart Regional Supervisor 5555 West Loop, Suite 300 Bellaire, Texas 77401 713--666-4964 TX-AN 850-1330 or 31		
			<u>CENTRAL OFFICE</u> Texas Air Control Board 8520 Shoal Creek Blvd. Austin, Texas 78758

TEXAS AIR CONTROL BOARD
Source Surveillance Investigator's Report

ATTACHMENT 1

Account Number: 1 _____ 7

01 Region: 11 _____ County: 13 _____ Local Program: 26 _____ Investigation Conducted By: 29 _____
 Date of Investigation: 32 / 34 / 36 _____ Regional and Compliance Divisions Status: AA 38 EX 39 DA 40 _____
 Regional determines EI Status should be: AA 41 EX 42 DA 43 _____ Area Land Use: A B C D _____

Name, Parent Company, Location and Mail Address:

CHANGE
10

02 11 _____ 48
 03 11 _____ 48
 04 11 _____ 48
 05 11 _____ 48
 06 11 _____ 48
 07 11 _____ 48
 08 11 _____ 48
 09 11 _____ 48

10 Name of Management: 11 _____ Title: 36 _____
 11 Person Contacted: 11 _____ Title: 36 _____ AC 52 No. 35 _____
 12 Nature of Business: 11 _____ EI Group No(s) 60 / 62 / 64 _____
 13 Primary Products: 11 _____

14 Biennial Investigation? 11 _____ Progress Report? 12 _____ Complaint Investigation? 13 _____ Permit Investigation? 14 _____
 Alternate Methods? 15 _____ Compliance Request? 16 _____ Upset and Maintenance Notification? 17 _____ Other? 18 _____
 Notice of Violation of 19 _____ issued. On this date account appears to be in compliance. Yes 26 No 27

15 Type of Sample taken: Property Line 11 _____ Opacity 12 _____ Stack 13 _____ Pollutant Sampled for: Particulate 14 _____ SO₂ 15 _____ H₂S 16 _____
 Other 17 _____ No sample taken but Problem Exists of Priority: High 24 Medium 25 Low 26 _____
 Emissions Inventory Point Source Number Sampled: 27 _____ Sampled Fugitive Emissions: 32 _____

16 Statement of Problem: 11 _____
 17 Complaint Number: 11 _____ Date Complaint Received 16 / 18 / 20 _____ Nature of Complaint: Odor 22 Smoke 23 Dust 24 Other 25 _____
 18 Complaint Number: 11 _____ Date Complaint Received 16 / 18 / 20 _____ Nature of Complaint: Odor 22 Smoke 23 Dust 24 Other 25 _____
 19 Complaint Number: 11 _____ Date Complaint Received 16 / 18 / 20 _____ Nature of Complaint: Odor 22 Smoke 23 Dust 24 Other 25 _____

If Name and/or Address Change, give Previous Name and/or Address:

Investigators: _____ Approved By: _____

Investigator's Comments:

REPORTS BASED ON THE
SOURCE SURVEILLANCE INVESTIGATORS REPORT FORM

The Source Surveillance Investigators Report Form (SSIR), Attachment 1, is the refined successor to the previously used form and was placed in use in May, 1974. The Source Surveillance Reporting System Manual contains detailed instructions for completion and distribution of the form. The reports generated from the SSIR form include but are not limited to:

1. The Master Catalog of Air Control Board Accounts - (See page XI - 8 for an example of this report.) This report is produced semi-annually for each region and local program as well as for selected counties.
2. The Investigators Report - (See page XI - 9 for an example of this report). This report is produced monthly and on request and displays investigation information as made by each investigating region or local program.
 - Report No. RO - 0005 summarizes by county
 - Report No. RO - 0006 summarizes by region
 - Report No. RO - 0007 summarizes by statewide totals
3. List of Active Accounts - (See page XI - 10 for an example of this report). This report is produced quarterly for all regions and local programs. This report is No. RO - 0011 (certain counties only) and RO - 0012 (all accounts). It has all the active accounts on the SSIR Master file - the address information, group, status, investigation date, type of investigation, compliance/violation information and jurisdiction information.
4. The Sampling Report - (See page XI - 11 for an example of this report). This report is produced semi-annually. The report displays all accounts which have sampling information, that is, those SSIR forms which have information on the Card 15 and/or Card 16. The address information is also printed for each account.

Although these are the reports generated now, any information existing on the SSIR form can be reported or listed as desired.

MASTER CATALOG OF ACR ACCOUNTS
REGION 08

DATE 04/09/74

LINE NO.	NAME AND COMPLETE ADDRESS	GROUP	STATUS	YEAR	MAILED	RECV	2-MAIL	2-RECV	COPI-A	SIC
101-431-7	WAZOS ELECTRIC POLE COOP INC ATTN: GENERAL MANAGER P O MILLER PLANT-MINERAL WELLS TEX P O BOX 6296 WACO TEXAS 7670641	10	EI-AA	73						4911
103-436-3	COTTON BELT GIN & MILL SUPPLY INC. 4408 28th AVE. BOX 26365 DALLAS TEXAS 75226	39	EI-AA RD-AA CM-AA	73						3559
106-385-5	HERSLEY ELECTRIC STEEL CO INC. 2116 JOE FIELD RD. BOX 20539 DALLAS TEXAS 75220	11	EI-EX RD-AA CM-AA	73						3313
109-054-2	MILLER BREWING CO., INC. 7001 S. FREEWAY FORT WORTH TEXAS 76134	32	EI-EX RD-AA CM-AA	73						2082
109-442-4	DASH MFG. CO. 315 W. RIPPY FORT WORTH TEXAS 76110	66	EI-AA RD-AA CM-AA	73	102-02-74	102-10-74	102-12-74			3949
109-930-2	ORRAN EPSOS GIN CO BOX 152 ROSSER TEXAS 76157	01	EI-EX RD-AA CM-AA	73						0712

TRAVIS COUNTY REGION 03

TOTAL NUMBER OF ACCOUNTS = 39
 TOTAL NUMBER OF INVESTIGATIONS = 56
 NUMBER OF BIENNIAL INVESTIGATIONS = 4
 NUMBER OF PROGRESS REPORT INVESTIGATIONS = 2
 NUMBER OF COMPLAINT INVESTIGATIONS = 15
 NUMBER OF PERMIT INVESTIGATIONS = 2
 NUMBER OF ALTERNATE METHODS INVESTIGATIONS = 3
 NUMBER OF COMPLIANCE REQUEST INVESTIGATIONS = 3
 NUMBER OF UPSET AND MAINTENANCE NOTIFICATION INVESTIGATIONS = 0
 NUMBER OF OTHER INVESTIGATIONS = 6
 NUMBER OF ACCOUNTS INVESTIGATED = 42

NUMBER OF SOURCES INDICATED IN COMPLIANCE = 102
 NUMBER OF SOURCES INDICATED NOT IN COMPLIANCE = 15
 NUMBER OF SOURCES COMPLIANCE UNDETERMINED = 24
 NUMBER OF NOTICE OF VIOLATION ISSUED = 7

NUMBER OF PROPERTY LINE SAMPLES TAKEN = 7
 NUMBER OF STACK SAMPLES TAKEN = 0
 NUMBER OF OPACITY READINGS TAKEN = 3
 NUMBER OF PARTICULATE SAMPLES TAKEN = 7
 NUMBER OF SO2 SAMPLES TAKEN = 2
 NUMBER OF H2S SAMPLES TAKEN = 1
 NUMBER OF OTHER SAMPLES TAKEN = 11
 NUMBER OF SOURCES WITH HIGH PRIORITY FOR SAMPLING = 12
 NUMBER OF SOURCES WITH MEDIUM PRIORITY FOR SAMPLING = 1
 NUMBER OF SOURCES WITH LOW PRIORITY FOR SAMPLING = 1

TOTAL NUMBER OF COMPLAINTS RECEIVED = 24
 ODOR = 6 SMOKE = 4 DUST = 12 OTHER = 2

WASHINGTON COUNTY REGION 03

TOTAL NUMBER OF ACCOUNTS = 78
 TOTAL NUMBER OF INVESTIGATIONS = 2
 NUMBER OF BIENNIAL INVESTIGATIONS = 0
 NUMBER OF PROGRESS REPORT INVESTIGATIONS = 0
 NUMBER OF COMPLAINT INVESTIGATIONS = 1
 NUMBER OF PERMIT INVESTIGATIONS = 0
 NUMBER OF ALTERNATE METHODS INVESTIGATIONS = 0
 NUMBER OF COMPLIANCE REQUEST INVESTIGATIONS = 1
 NUMBER OF UPSET AND MAINTENANCE NOTIFICATION INVESTIGATIONS = 0
 NUMBER OF OTHER INVESTIGATIONS = 0
 NUMBER OF ACCOUNTS INVESTIGATED = 0

NUMBER OF SOURCES INDICATED IN COMPLIANCE = 1
 NUMBER OF SOURCES INDICATED NOT IN COMPLIANCE = 1
 NUMBER OF SOURCES COMPLIANCE UNDETERMINED = 17
 NUMBER OF NOTICE OF VIOLATION ISSUED = 1

NUMBER OF PROPERTY LINE SAMPLES TAKEN = 1
 NUMBER OF STACK SAMPLES TAKEN = 1
 NUMBER OF OPACITY READINGS TAKEN = 1
 NUMBER OF PARTICULATE SAMPLES TAKEN = 2
 NUMBER OF SO2 SAMPLES TAKEN = 1
 NUMBER OF H2S SAMPLES TAKEN = 1
 NUMBER OF OTHER SAMPLES TAKEN = 0
 NUMBER OF SOURCES WITH HIGH PRIORITY FOR SAMPLING = 1
 NUMBER OF SOURCES WITH MEDIUM PRIORITY FOR SAMPLING = 0
 NUMBER OF SOURCES WITH LOW PRIORITY FOR SAMPLING = 0

TOTAL NUMBER OF COMPLAINTS RECEIVED = 3
 ODOR = 1 SMOKE = 2 DUST = 0 OTHER = 0

ALPHABETICAL LISTING OF ACCOUNTS CONTAINING SAMPLING INFORMATION
 REGION XX

ACCOUNT NO.	NAME-PARENT CO.-LOCATION-MAIL ADDRESS	SAMPLE DATE	TYPE OF SAMPLE	POLLUTANT	SOURCE	PRIORITY	STATEMENT OF PROBLEM
113-914-2	CEZELL-KEY GRAIN CO. 15 MILES EAST OF SNYDER ON HWY 69 P.O. BOX 1062 SNYDER, TEXAS 79549	02/01/73	PROPERTY LINE	SO2	59001		
115-753-1	MUSTON-ACSI SERVICES R.F.M. 644 P.O. BOX 97 CORRATON, TEXAS 76701	02/03/73	OPACITY	H2S	00630		
116-290-3	UNITED COMPANIES, INC. SOUTH HIGHWAY 14 NORTH FORK GRAVEL ROAD P.O. BOX 1085 MEXIA, TEXAS 70224	01/16/73				HIGH	XX XXXXX XX XXX XX XX XXXXX XXX XX XXXXX XX XXX XX