

Appendix G

Nonindustrial Fugitive Dust Controls  
in El Paso

## Nonindustrial Fugitive Dust Controls in El Paso\*

Source Category	TACB Regulation	Comments
Sanding/ Salt	None	Due to the relatively mild climate in El Paso, an annual average of only 4,000 cubic yards of sand has been used for ice/snow control. The limited use of sand for ice/snow purposes makes control of this source category unwarranted.
Spills from haul trucks	111.143 (3) (B)	All open bodied trucks, trailers, or railroad cars transporting materials which can create airborne particulate matter in public areas must take precautions to reduce loss. These precautions include application of water or suitable chemicals, or complete covering of the materials. At a minimum, complete covering is required in the City of El Paso.
Construc- tion carry- out and entrain- ment	None	According to public hearing testimony, proposed control for washing the wheels of construction equipment before entering a public thoroughfare is unenforceable and a waste of scarce water resources. Therefore, control of this category of sources will be reconsidered during the preparation of the final State Implementation Plan after the special study.
Vehicle entrain- ment from unpaved adjacent areas	111.147 (2)	Because of the desert climate in El Paso, it is not economically or technically feasible to pave or attempt to vegetate areas close to paved roads. However, Texas Air Control Board Regulation 111.147(2) requires removal of soil and other materials from paved surfaces to achieve maximum control of dust

\*Based on the U. S. Environmental Protection Agency draft document Appropriate Approaches to the Control of Nonindustrial Fugitive Dust in Urban Areas.

Source Category	TACB Regulation	Comments
		emissions to the extent practicable, except for sand applied for the specific purpose of snow or ice control. In the City of El Paso, removal of soil will be accomplished by mechanical sweepers or their equivalent.
Erosion from storm water washing onto street	None	El Paso receives an average of only eight inches of rain per year. Therefore, storm water washing onto streets is not a problem and the recommended controls for this source category are not applicable.
Wind erosion from adjacent areas	None	In a desert climate such as that of El Paso, the recommended controls are not technically or economically feasible. Additionally, the impact of open land and unpaved roads in Juarez on the air quality in El Paso is still to be determined.
Unpaved roads	111.147 (1)	Application of asphalt, water, or suitable oil or chemicals is required on the unpaved surfaces of industrial facility roadways, public thoroughfares, commercial roads, and residential roads.
Unpaved parking	111.149 (b)	In the City of El Paso, parking surfaces with more than five parking spaces must be paved or uniformly covered with gravel. Lots with more than 100 parking spaces must be paved or covered by an equivalent method.
Construction sites	111.145 (1)&(2)	In order to control dust in the demolition of structures, construction operations, work performed on a road, street, alley, or parking area, or clearing of land, water, oil, or other suitable chemicals must be used. Additionally, the use of adequate methods such as wet-sandblasting and enclosure of work areas is required to prevent airborne particulate matter during sandblasting of structures or other similar operations.