

# TEXAS AIR CONTROL BOARD



REVISIONS

TEXAS STATE IMPLEMENTATION PLAN  
CONTROL STRATEGIES

-- TOTAL SUSPENDED  
PARTICULATE

JULY 11, 1980



DRAFT CONTROL STRATEGIES FOR SIX TOTAL SUSPENDED PARTICULATE  
NONATTAINMENT AREAS

As a result of negotiations with EPA subsequent to the submittal of our Revised SIP Control Strategy for Total Suspended Particulate on April 13, 1979, we agreed to submit further revisions that would address seven additional particulate nonattainment areas. EPA has proposed to make the submittal of a control strategy for each of these seven additional areas a condition for approval of our SIP and has set August 1, 1980 as the last date for submittal. Since our agreement with EPA, further review of ambient measurements in one of the seven areas, Dallas 3, indicates no violation of any particulate standard since 1976; therefore, no strategy for that area will be proposed.

List of Additions to the Revised TSP Control Strategy  
Texas State Implementation Plan

April 11, 1980

1. Control strategy addition for San Benito, Brownsville, Corpus Christi 1, Corpus Christi 2, Dallas 1, and El Paso 4 follow the El Paso 2 strategy, page VI-54 of the Revised Texas SIP (reprinted December 21, 1979).
2. Appendix L addition, L-7 through L-12, follow Appendix L-6, page L-9.
3. Appendix M addition, Nonattainment Area Boundaries for San Benito, Brownsville, Corpus Christi 1, Corpus Christi 2, Dallas 1, and El Paso 4, follow the boundary description for El Paso 2, page M-3.
4. Appendix O addition, TSP emissions inventory for sources in the San Benito, Brownsville, Corpus Christi 1, Corpus Christi 2, Dallas 1, and El Paso 4 NAA's follow the El Paso 2 inventory, page O-2.

San Benito

Standard Exceeded: Primary  
TACB/EPA Region: 4/213  
Monitor (SAROAD) No.: 4600001 F01

The baseline air quality shows an exceedance of the primary NAAQS, with an AGM of 132  $\mu\text{g}/\text{m}^3$ . The major causes of nonattainment of the standard in this NAA have been identified as seasonal fugitive particulate emissions from a grain storage elevator and cotton gin which are both within 50 yards of the monitor, and fugitive emissions from paved streets and parking lots. The agricultural processing facilities have cooperated with the TACB by applying all reasonably available control measures and are in compliance with Regulation I. Compliance with the changes to Regulation I incorporated in Rules 131.03.04.002-.005 will yield substantial reductions in fugitive dust emissions from streets and parking lots and may be expected to result in attainment of the primary and secondary NAAQS for TSP, as shown in Appendix L-7.

Brownsville

Standard Exceeded: Primary  
TACB/EPA Region: 4/213  
Monitor (SAROAD) No.: 0650004 F01

The baseline air quality shows an exceedance of the primary NAAQS, with an AGM value of 87  $\mu\text{g}/\text{m}^3$ . The major causes of nonattainment of the standard in this NAA have been identified as fugitive particulate emissions from the railroad warehouse area located 200 feet east and southeast of the monitor and the associated truck traffic on Ringold and Sixth Streets. Compliance with the changes to TACB Regulation I will yield sufficient reductions in the fugitive emissions to result in attainment, as shown in Appendix L-8.

Corpus Christi 1

Standard Exceeded: Primary  
TACB/EPA Region: 5/214  
Monitor (SAROAD) No.: 1150020 G01

The baseline air quality shows an exceedance of the primary NAAQS, with an AGM of 101  $\mu\text{g}/\text{m}^3$ . The major causes for nonattainment of the standard have been identified as fugitive dust emissions from roads and parking lots. Specifically, Navigation Boulevard has very dirty shoulders, Up River Road has unpaved shoulders and several contiguous unpaved lots; both these roads have heavy truck traffic. Compliance with the changes to TACB Regulation I will yield substantial reductions in fugitive dust emissions from roads and lots and should result in attainment, as shown in Appendix L-9.

Corpus Christi 2

Standard Exceeded: Secondary  
TACB/EPA Region: 5/214  
Monitor (SAROAD) No.: 1150016 G01

The baseline air quality shows an exceedance of the secondary NAAQS, with a second-high 24-hour value of 221  $\mu\text{g}/\text{m}^3$ . This monitor located on private property in an area restricted to public access is surrounded by uncovered soil. The major causes of nonattainment of the standard in this NAA have been identified as local fugitive particulate emissions from both public and private roads and lots, materials handling and construction activities. Specifically, many industrial haul roads are unpaved or have unpaved shoulders, the ship channel dock area is unpaved and the shoulders of both Navigation Boulevard and Cantwell are unpaved. As indicated in the TSP Attainment Analysis, Volume I - Causes of Nonattainment, Texas Air Control Board, January 1977, point source industrial emissions appeared not to be a significant contributor to the high TSP levels measured at

the monitor in this NAA. Since this study there have been voluntary decreases in emissions from three large industrial sources (Centex Cement Corporation, Corpus Christi Public Elevator and PPG Industries), which further decreases the industrial source impact at this monitor. Thus, the voluntary decreases by the above industrial sources plus compliance with changes to TACB Regulation I concerning fugitive emissions should result in attainment of the TSP standard. The expected emission reductions and resulting air quality improvement from sources within a one-quarter mile radius of the monitor are shown in Appendix L-10.

Dallas 1

Standard Exceeded:	Primary
TACB/EPA Region:	8/215
Monitor (SAROAD) No.:	1310023 H01 (discontinued 12/31/78)
	1310049 H01 (new site initiated 1/1/79)

The baseline air quality shows an exceedance of the primary NAAQS with an AGM of  $80 \mu\text{g}/\text{m}^3$ . Monitor (1310023 H01) was moved on December 31, 1978, to a site one-quarter mile west-northwest of the original site which is more representative of the ambient air in this portion of Dallas. The major causes of nonattainment of the standard in this NAA have been identified as fugitive particulate emissions from roads and parking lots. Highway construction activity south and southwest of the monitoring site from 1974 through 1977 probably accounted for the high sample values during that time period. Compliance with changes to TACB Regulation I should result in attainment, as shown in Appendix L-11.

El Paso 4

Standard Exceeded: Secondary  
TACB/EPA Region: 11/153  
Monitor (SAROAD) No.: 1700019 G01  
1700024 G01

The baseline air quality shows an exceedance of the secondary NAAQS, with second-high 24-hour values of 218 and 161  $\mu\text{g}/\text{m}^3$  representing monitors 1700019 and 1700024. The major causes of nonattainment of the standard have been identified as fugitive particulate emissions from paved and unpaved roads, unpaved alleys, and high regional background. Compliance with changes to TACB Regulation I will yield sufficient reduction in the fugitive emissions to result in attainment, as shown in Appendix L-12. However, infrequent exceedances of the NAAQS for TSP may occur due to the wind erosion of the nearby arid land areas. No reasonable or cost effective control measures for this natural phenomenon are currently known; however, fugitive dust from this natural source is generally nontoxic or nonrespirable. The TACB and the local air pollution control agency will continue to study and analyze the reasonableness and cost effectiveness of control measures.