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SIP Revision: Dallas, El Paso, and Tarrant Counties, Post-1982 Ozone Control Strategies, August 1985

In August 1985, the Texas Air Control Board (TACB) adopted a Post-1982 Ozone Control Strategy State Implementation Plan (SIP) revision for Dallas, El Paso, and Tarrant Counties.

Summary of the SIP Revision

Adoption Date: 08/1985

EPA Action: The EPA proposed disapproval of this revision to the SIP on July 14, 1987 (52 FR 26421) asserting that it did not demonstrate that the amount of VOC emissions reductions provided were sufficient to attain the ozone NAAQS by any near-term fixed date.

Background: In August 1985 the TACB adopted SIP revisions to address Dallas, Tarrant, and El Paso Counties' failure to attain the ozone National Ambient Air Quality Standard (NAAQS) by the attainment deadline of December 31, 1982. The United States Environmental Protection Agency (EPA) required the state to submit SIP revisions by the end of 1984, for those areas to ensure that the areas attained the ozone NAAQS by December 31, 1987. The state was required to review ozone monitoring data, calculate the amount of emission reductions needed, identify measures available to reduce emissions, and devise legally enforceable measures to provide the required reductions. The purpose of this SIP revision was to accomplish volatile organic compounds (VOC) emission reductions required by the Federal Clean Air Act (FCAA) to avoid sanctions and penalties.

Key Changes: The SIP revision included updated emissions inventories for each county and new air modeling that used city-specific conceptual air chemistry models. The TACB estimated that VOC emission reductions of approximately 52% would be needed for Dallas and Tarrant Counties to attain the ozone standard. Since the air quality in El Paso was heavily influenced by emissions in Juarez, Mexico, the SIP included modeling showing what would happen if certain reductions were applied to Juarez.

The SIP accounted for deadline extensions that were granted to certain businesses for VOC controls in the graphic arts and certain coating industries and included the following controls for Dallas and Tarrant Counties:

- Vapor recovery systems for large VOC terminals;
- Requirements that gasoline tanks be tested to ensure that they were vapor-tight;
- Requirements for control equipment and practices in degreasing operations;
- Requirements for control equipment installation for certain dry cleaners in Dallas;
- Limits on the VOC content of coating operations, including airplane coating;
- Limits on the use of cutback asphalt;
- Additional limits on emissions from gasoline terminals; and



Texas State Implementation Plan

Requirements that certain VOC point sources flare or incinerate their vent gases.

The following controls were put in place for El Paso County:

- Requirements that gasoline tanks be tested to ensure that they are vapor-tight;
- Stage I vapor recovery at service stations; and
- Limits on the use of cutback asphalt.

The SIP also contained transportation control measures (TCM) that had been developed by local partners. Each county implemented different TCMs, which depending on the area, included:

- Signal timing improvements;
- Staggered work hours;
- Reduced transit fare;
- Intersection improvements;
- Carpool/vanpool improvements;
- Transit improvements;
- Provisions for inspection and maintenance programs; and
- A commitment to conduct conformity analysis on transportation projects.

The TACB evaluated Stage II vapor recovery as a control measure for each of these areas, but determined it was not a reasonably available control measure (RACM) due to its cost. The SIP projected reasonable further progress (RFP) and attainment of the ozone NAAQS for all three areas by the December 31, 1987 deadline.

SIP Narrative and Appendices

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