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# TACB Bulletin

6330 HWY. 290 EAST AUSTIN, TEXAS 78723 512/451-5711

DECEMBER 1984

## OZONE ISSUES CONTINUE HIGH ON TACB AGENDA

Ozone nonattainment issues continue to receive wide attention as the Texas Air Control Board (TACB) works on meeting federal requirements in Dallas, Denton, El Paso, Harris, and Tarrant counties.

The board at its December meeting awarded a \$22,000 contract to the North Central Texas Council of Governments (NCTCOG) for assistance in developing the mobile source portion of the ozone state implementation plan (SIP) required by the Environmental Protection Agency (EPA) for Dallas and Tarrant counties.

The contract makes NCTCOG responsible for analyzing final emission reduction and cost estimates for various transportation control measures to be considered for inclusion in the SIP revisions for the two counties; getting commitments from local officials and authorities for the implementation of measures found to be feasible; assisting the TACB in the preparation for and holding of public hearings; obtaining the support of the Dallas/Tarrant counties regional air quality task force in soliciting recommendations from elected officials and policy bodies in the two counties; and assisting in the initial implementation of any vehicle inspection and maintenance programs chosen for the two counties. Deadline for completion of the contract is August 31, 1985.

## EPA EXTENDS SIP DEADLINE FOR THREE COUNTIES

The EPA has extended to August 31, 1985, the time by which the TACB must submit final revisions to the SIP for ozone in Dallas, Tarrant, and El Paso counties, and carbon monoxide in El Paso County. The deadline was changed from February 24, 1985.

The TACB staff will seek board approval early in 1985 to conduct public hearings in February or March on the proposed revisions to the SIP for the three counties before it goes to EPA in August.

Oral and written comments made by representatives of a wide group of public and private interests following public meetings held in Dallas, Tarrant, and El Paso counties in October are being given major consideration in the preparation of revisions to the SIP for control of ozone and carbon monoxide. Comments were received by the TACB from members of the public, local government representatives, industrial representatives, environmental groups, and public citizens groups.

## NEED FOR OZONE SIP FOR DENTON COUNTY QUESTIONED

The TACB suggests in a December 10 letter to Dick Whittington, EPA Region 6 administrator, that exceedance of the national ozone standard in Denton County may be the result of the transport of ozone from Dallas and Tarrant counties. Those counties are under a federal

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The TACB's September 1, 1982-August 31, 1984 Biennial Report will be available soon. Copies will be sent upon request to:

TACB Public Information Section  
6330 Highway 290 East  
Austin, Texas 78723

mandate to reduce their ozone levels to comply with the national standard by December 31, 1987. EPA informed Gov. Mark White on October 5 that the ozone standard in Denton County and the carbon monoxide standard in parts of Harris County had been exceeded.

In his response to EPA, Executive Director Bill Stewart questioned the need for an ozone SIP for Denton County "at this time" as TACB staff is of the opinion that controls adopted for Dallas and Tarrant counties will significantly affect any emission reduction requirement for Denton County. The TACB letter requests that the October 5, 1985 deadline for revising the Denton County ozone SIP be reset to March, 1986.

Ozone measurements are made by a City of Dallas monitor set up just inside the Denton County line north of Dallas and Tarrant counties to monitor ozone downwind of Dallas.

Stewart's letter to EPA included a schedule of activities to complete the carbon monoxide SIP revisions for Harris County but also questioned the necessity of such revisions. He said the agency will analyze data from both Denton and Harris counties and will withhold commitment to submit revisions in both cases until the results of the analyses are known.

## HARRIS COUNTY SIP REVISIONS PENDING APPROVAL

The TACB staff is preparing to submit to Gov. White the board-approved revisions to the vehicle inspection and maintenance portion of the 1982 Harris County ozone SIP revisions. If the governor approves, the changes will be presented to the EPA whose approval would make them federally enforceable.

The changes in the SIP incorporate the Department of Public Safety (DPS) rules for the annual vehicle emission controls inspection as well as a number of minor "housekeeping" items. The pass/fail criteria for meeting emission standards is revised to include voluntary replacement of the tail pipe whenever catalyst replacement is required on 1980 and newer vehicles. However, an added provision requires that inspectors inform owners of vehicles on which catalyst replacement is required that there is a potential for subsequent lead test failures and catalyst replacement requirements if the contaminated tail pipe is not also replaced.

## HARRIS COUNTY I/M PASS-FAIL DATA STUDIED

Slightly less than three percent of 34,642 automobiles and light-duty trucks in Harris County on which test data has been processed failed to pass the parameter inspection/maintenance tests being administered by the DPS under the revised ozone SIP for the county. These vehicles were among certain 1980 and later models inspected during the first three months of the program which went into operation on July 1.

DPS processes test data in batches dependent upon their normal work load and, therefore, complete data for inspections carried out during the three-month period ending September 30 is not yet available.

A total of 688 vehicles in the processed group failed to pass inspection because of altered or removed catalytic converters and/or fuel

inlet restrictors, or failure to pass the tail pipe lead test. The lead test accounted for 585 failures--64 percent of all failures in the processed group, more than any other single category. Vehicles are found to fail the tests if one or more of the parameters does not meet the required standard. Owners have up to one year in which to effect the replacement of the catalytic converter.

There were 585 failures because of the presence of lead in the tail pipes although only 356 vehicles failed because of fuel inlet restrictor tampering. (Misfueling can occur through the use of circumvention devices, such as gasoline nozzle adapters; using gasoline from a mislabeled pump; or using gasoline from a properly labeled pump which has been contaminated.)

A TACB staff assessment of the DPS data points out that the relatively low number of vehicle tests tabulated to date do not form an adequate basis to clearly define a trend in the pass/fail rate. There are more than a million vehicles in the county which qualify for testing under the I/M program. Some 160,000 vehicles are inspected per month.

## REVISIONS MADE TO COMPLIANCE DATE EXTENSIONS

The board has approved revisions to compliance date extensions previously issued for two Dallas firms engaged in the printing of flexible packaging. The revisions were necessary to satisfy requirements by EPA but do not affect the final date for compliance, December 31, 1985. The firms are Dixico, Inc., and Princeton Packaging, Inc.

## DELHI'S PERMIT EXTENSION BID IS REJECTED

The board ruled at its December meeting on two contested case actions.

It decided against Delhi Gas Pipeline Corp. of Dallas, which sought to overturn a decision by the executive director denying a second one-year extension of time for beginning construction of a natural gas processing facility near Athens, Henderson County.

Delhi received a permit on April 29, 1982, to begin construction within one year; this was extended for one year, to April 29, 1984. A request for a second extension was made to the TACB on May 4 and was rejected. On May 18 Delhi asked for reconsideration, and on May 31 Executive Director Stewart ruled that he did not have the discretionary power to extend the permit because the deadline had not been met.

Staff Attorney Jim Braddock pointed out to the board that it had ordered that all permits contain the condition which states that a permit may become automatically void and establishes the process for determining the date on which that would occur.

Attorney Ronald H. Williamson, of Dallas, addressed the board on behalf of the company, and Tom Buckle, Austin attorney, spoke as the representative for 27 Henderson County residents who sought to block extension of the permit. Hearing Examiner Jose E. Camacho recommended denial of the appeal.

Delhi may reapply for a permit, or may appeal the board's decision in a state court.

# TACB Bulletin

## BOARD DENIES PERMIT APPROVAL FOR ENVIROSAFE

The board denied a permit to Envirosafe Services of Texas, Inc., to construct a 585-acre landfill hazardous waste facility near Devers, in Liberty County. Final order in the case will be presented for board approval at the January 11 meeting.

Approval of the facility was recommended by TACB legal staff but not by the hearing examiner. Board Chairman John L. Blair said the board must have proof that the landfill would comply with all board regulations.

The board heard arguments by Hearing Examiner Camacho, TACB Attorney Patricia Finn-Walker, Envirosafe Attorney R. Kinnan Golemon, and Attorney Tom Aubry, spokesman for People Against a Contaminated Environment (PACE). Some one hundred members of PACE attended the meeting.

Envirosafe filed a request in September 1982 for an exemption to the TACB requirement for a construction permit or, if such an exemption would be denied, a permit to construct an integrated hazardous waste management facility near Devers, in Liberty County. The TACB examiner's recommendation at the conclusion of an extended contested case hearing was that Envirosafe's request for an exemption be denied on the basis that the proposed facility would make a significant contribution of air contaminants to the environment, and that the application for a construction permit be denied on the basis that there is insufficient evidence in the hearing record that emissions from the proposed facility would not cause a nuisance.

Envirosafe may appeal the board's decision in a state court.

## LEGISLATIVE CONTINUANCE DELAYS HEARING

State Representative Paul Hilbert was granted a legislative continuance by a TACB hearing examiner to delay a contested case hearing on the application by DuBrook, Inc., to construct a 300-ton per hour hot mix asphalt plant in Spring, Harris County. The hearing examiner will reset the hearing for a date after the adjournment of the Legislature. Rep. Hilbert, U.S. Congressman Jack Fields, and several hundred residents of the area had requested the contested case hearing on the application. The hearing had been set for January 7.

## TACB HONORS ITS LONG-TERM EMPLOYEES

Eleven employees of the TACB were recognized by the board at its December meeting and presented certificates by the executive director for the completion of 10 years of service with the agency, bringing to 29 the number who completed 10 years of service in 1984. Clifford E. Farnum of the Houston regional office was presented a 15-year award.

Since the beginning of the awards program in December 1978, TACB has presented 10-year certificates to 153 employees and 15-year certificates to 11.

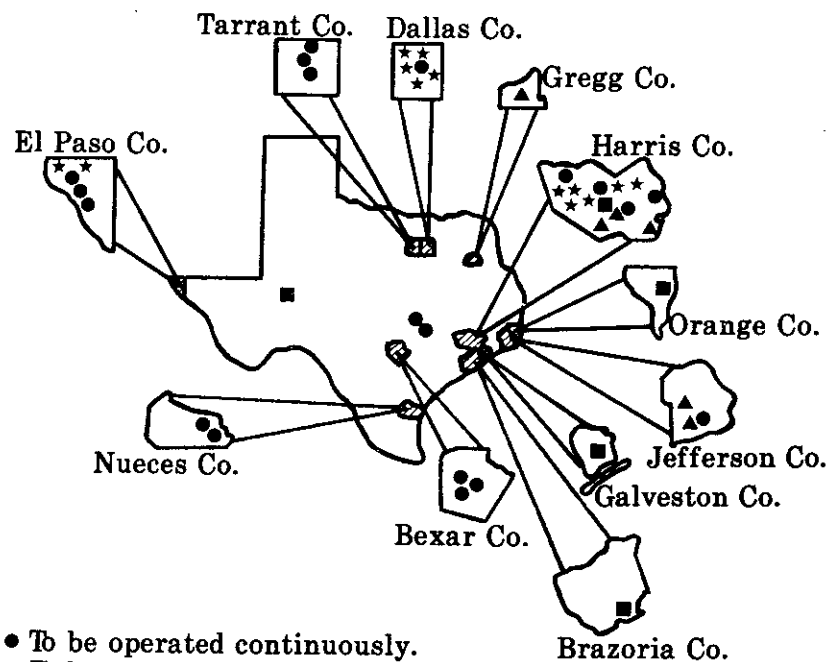
Receiving certificates this month were Sylvia J. Cole, data processing; John B. Turney, legal enforcement; C. William Smalling, Houston region; Barbara L. Gomez, technical support and regulation development; Jere K. Potter, Fort Worth region; David R. Henrichs, compliance; Betty A. Lindgren, management services; M. Terri Pierce, policy analysis;

*(Continued on page 6)*

The TACB plans to trim its statewide air monitoring network effective January 1 to transfer some personnel and funds to field inspection and complaint response activities and sampling for toxic air contaminants. Executive Director Stewart said the reductions will not appreciably reduce the systems' effectiveness in measuring air contaminants in strategic locations over the state and the Texas network will continue to be one of the most outstanding in the nation. Planned changes are shown in the accompanying maps. Slight alterations may yet be made.

The continuous air monitoring station (CAMS) network

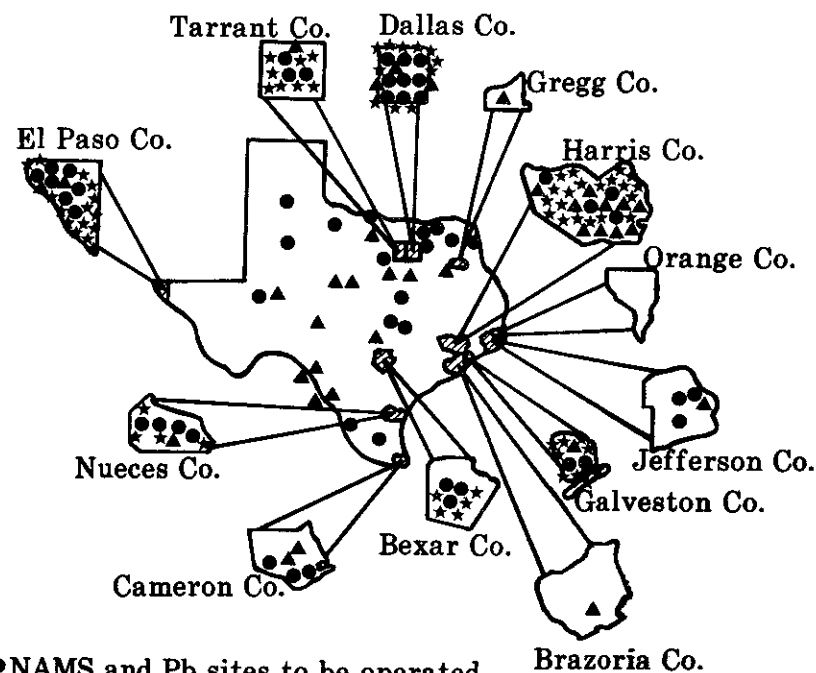
### Continuous Air Monitoring Stations (CAMS)



- To be operated continuously.
- ▲ To be operated in FY85, not operated in FY86 and alternated annually thereafter.
- Stations that will not be operated in FY85 but operated alternately annually thereafter.
- \* Stations operated by local programs.

is to be reduced by approximately 18 percent by operating 11 stations on an alternating annual schedule: six in odd-numbered years and five in even-numbered years. The noncontinuous air monitoring station (NCAMS) network will be reduced by approximately 40 percent. This network generally consists of high-volume air samplers each of which is operated over a 24-hour period every six days. The TACB will continue to operate those stations which are part of the National Air Monitoring System (NAMS) and are used by the Environmental Protection Agency to monitor trends in air quality throughout the nation. Special stations used to monitor for lead also will continue to operate.

### Noncontinuous Air Monitoring Stations (NCAMS)



- NAMS and Pb sites to be operated.
- ▲ Sites to be discontinued.
- \* Sites operated by local programs.

Jeannette L. Penn, ambient monitoring; Manny H. Pointer, permits; and Elizabeth R. Sullivan, El Paso region.

Ten-year awards presented earlier in the year went to Frank R. DeVooght, quality assurance; Richard P. Tamayo, management services; Irvin L. Bilsky, permits; Paul O. Kandt, Abilene region; Michael F. Sweeney, quality assurance; Jack A. Veach, El Paso region; Carl H. Snow, Jr., air quality data analysis; Dionicio Farias, Jr., Corpus Christi region; Sharon L. Romine, management services; Debra A. Bell, management services; Joe J. Barton, Waco region; Jerry M. Demo, Waco region; James E. Crocker, permits; George F. Daugherty, Tyler region; James D. Sandel, Fort Worth region; Henry W. Basse, ambient monitoring; Roy G. Hanlan, ambient monitoring; and William A. Kadish, quality assurance.

## ACID DEPOSITION TOPIC FOR TACB RESEARCH STUDIES

The TACB's Monitoring and Research Committee has earmarked \$25,000 of its research budget for studies aimed at learning more about acid deposition--usually referred to as acid rain.

The University of Texas at Austin is engaged in an \$8,000 study to assess potential acid deposition monitoring sites suitable for ecological studies aimed at determining the best site for a baseline acid deposition monitor to be located in the area generally north of Houston. TACB staff said the need to locate a site near Houston is based on the probable emissions contributions and sensitivity of this area to acid deposition. TACB anticipates an expenditure of some \$10,000 for the purchase of a monitor plus site preparation, supplies, and analysis of samples.

Other acid deposition research activities planned include setting up a data management and reporting system to facilitate the coordination of results from various acid rain monitoring systems and any forthcoming effects studies, and sponsorship of an acid rain symposium in 1985 related to issues in Texas.

An interagency acid rain working group cosponsored by the TACB Research Division and Texas Parks and Wildlife Department is addressing the subject of potential impacts of acid rain. The group will seek to identify experts both inside and outside the state whose experience and data can be brought to bear on the Texas situation. Various studies made over a number of years for purposes other than acid rain deposition research could be of value in assessing possible adverse impacts of acid deposition on such indicators as plants, soil, microorganisms, and water quality, and in identifying and assessing the significance of changes, the group agreed.

The group also agreed there is a need for some coordinated monitoring. TACB has been operating its own network of rainfall monitors since 1979 and in addition has set up one National Atmospheric Deposition Program (NADP) monitor near Longview in Gregg County. This is one of four NADP monitors in the state; others are located at Nacogdoches, Victoria, and Big Bend National Park.

A TACB report on acid deposition says that results of samples taken so far show the most acidic precipitation is occurring at Tyler with some

acid precipitation at Beaumont and Fort Worth, and alkaline precipitation at Odessa. An analysis of Texas acid rain data has not indicated a clear trend in precipitation data, according to the report, but the potential may exist for adverse impacts in parts of East Texas where acidic precipitation has been monitored and where the areas most susceptible to acid deposition are located.

## WORK ON PRACTICAL ASPECTS OF BORDER POLLUTION URGED

The complexities of international economic problems, differences in governmental organizations, extremes in socio-economic achievement and restrictions on programs and funding of interested agencies combine to form a major hurdle in current efforts to improve the quality of life along the Mexico/USA border through a binational environmental program.

A TACB representative in the working group concerned with practical aspects of transfrontier air pollution and other health problems along the border is of the opinion that the group should explore a broad range of environmental health training needs including air pollution, hazardous materials storage, spills or leaks, agricultural chemical use, and others. This view also was taken by the El Paso City-County Health Unit and the University of Texas at El Paso members at a meeting this month in El Paso. The EPA representative's primary concern was identified as that of air pollution, the problem for which the group was organized, but broader EPA consideration may be developed, he told the group.

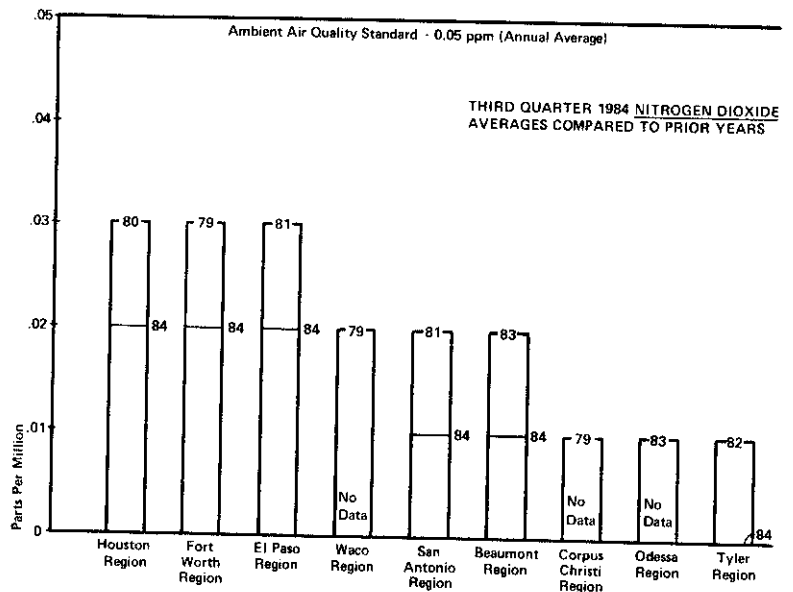
Hands-on, how-to training for Texas/Mexico border health personnel is expected to result from the group's efforts. The El Paso-Ciudad Juarez area is one of three on the border designated for initial attention by the international air quality working group organized following the signing in 1983 of the USA/Mexico agreement by the presidents of the two countries. Others are the San Diego-Tijuana area and the Arizona-Sonora area.

## TACB data, third quarter, 1984

# Air quality summary

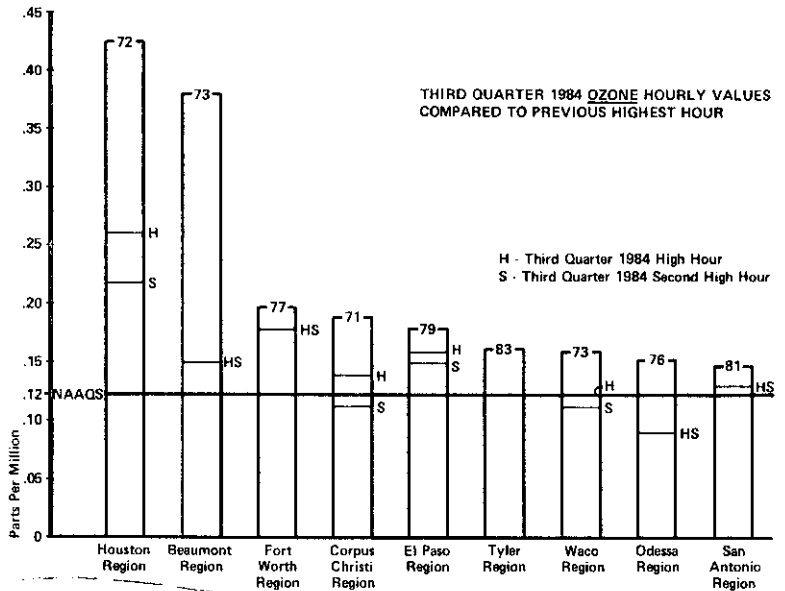
### NITROGEN DIOXIDE

The national ambient air quality standard for nitrogen dioxide (NO<sub>2</sub>) is .05 parts per million (ppm) annual average. This graph presents the average concentration of NO<sub>2</sub> for the third quarter of 1984 compared to the highest concentration recorded for each region. The 1984 NO<sub>2</sub> annual averages are typically one half of the standard and are generally the same or lower than the previous years.



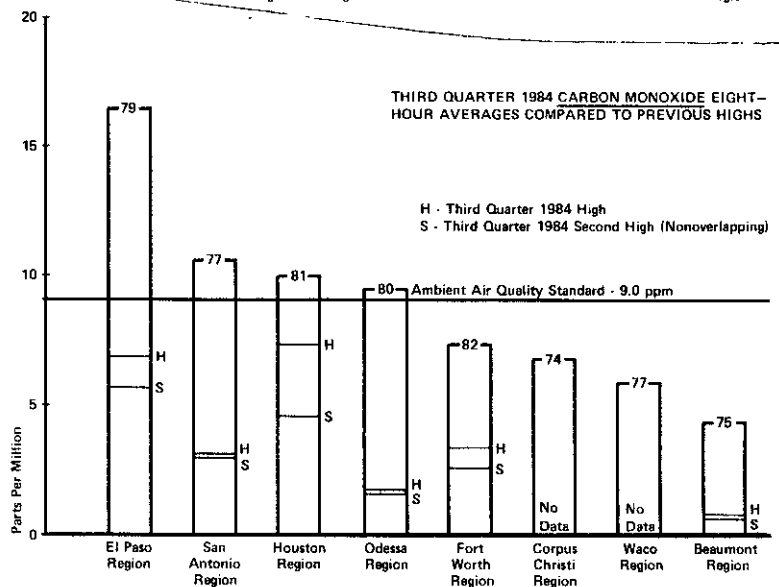
## OZONE

The national ambient air quality standard for ozone ( $O_3$ ) is a daily maximum hourly average of .12 ppm not to be exceeded more than an average of once per year over a three year period. This graph presents the high and second high  $O_3$  values observed for the third quarter of 1984 compared to the high values previously observed in each region. The standard was exceeded in the Houston, Beaumont, Fort Worth, El Paso, and San Antonio regions. All other regions did not observe concentrations above the standard.



## CARBON MONOXIDE

One of the national ambient air quality standards for carbon monoxide (CO) is an eight-hour average of 9 ppm not to be exceeded more than once per year. The graph comparing eight-hour CO concentrations for the third quarter of 1984 to previous years eight-hour concentrations shows that the standard has been attained over the whole state.



## SULFUR DIOXIDE

One of the national ambient air quality standards for sulfur dioxide ( $SO_2$ ) is .5 ppm for a three-hour period, not to be exceeded more than once per year. This graph compares the highest three-hour concentration ever observed in each region to the highest three-hour concentration observed in the third quarter of 1984. The graph shows that the three-hour  $SO_2$  standard has not been exceeded in 1984.

