

# Housekeeping

Safety Share

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- Good Housekeeping onsite and at the office/yard/shop indicates a good safety culture. Poor housekeeping promotes inefficiency and leads to injuries, property loss, and OSHA/MSHA/TCEQ violations and fines.
- Ways to Improve: **be organized**, have designated places for storage of tools and equipment. Designate walking areas/paths and parking areas. Barricade objects or areas where people or equipment should not go. Keep tools and equip clean. **Don't be lazy** – pick up trash, put lids back on containers securely, pay attention and take note of leaks and spills and see that they are reported to management. If you see a housekeeping problem – fix it or report it to someone who can.



# Update on EPA NAAQS

TXAPA Sustainability and Permitting Committee

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# What are the NAAQS?

- The NAAQS, or National Ambient Air Quality Standards, are limits on ambient air concentrations of six pollutants that cause smog, acid rain and health hazards.
- The six pollutants for which NAAQS have been set includes ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), CO, NO<sub>x</sub> and Pb.
- Primary NAAQS – protect human health with a margin of safety
- Secondary NAAQS – protect the environment
- EPA reviews each on a 5 yr basis per CAA

# What are the sources of NAAQS pollutants at HMPs?

- HMA plants emit PM10, PM2.5, NOx, VOCs, CO and Pb.
- PM10 sources: baghouse, roads, stockpiles, matl handling
- PM2.5 sources: same as above plus combustion particulate, asphalt vapors
- CO, NOx, VOC sources: baghouse combustion emissions, asphalt vapors
- VOCs and NOx combine to make ozone in the atmosphere
- Pb sources: small amount of lead from combustion thru baghouse stack
- Biggest concern for modeling HMP is PM2.5

# What NAAQS recently changed?

- The NAAQS for annual PM<sub>2.5</sub> was recently reduced from:  
12 µg/m<sup>3</sup> to 9 µg/m<sup>3</sup>
- This is a significant decrease in the allowable concentration of PM<sub>2.5</sub> at the property line.
- The EPA and TCEQ operate a series of air quality monitors throughout the US and Texas that measure the concentrations of NAAQS pollutants.
- Many areas of the country and Texas are very close to (or over) the revised NAAQS standard, including the DFW area, Harris County, Travis County and South Texas.

# What is the NAAQS impact on permitting HMPs?

- In order to acquire an air permit to build or modify a HMP, it's impact on the ambient air quality must be determined through air dispersion modeling.
- The impact of the new or modified sources on the existing air quality is assessed at the site's property line.
- If the ambient air quality is already close to (or over) the standard, additional emissions are hard or impossible to model and permitting is not feasible.

# New NAAQS impact on NSR permitting

- If the site background concentration of PM<sub>2.5</sub> is less than 9 µg/m<sup>3</sup> :  
Moderate annual production, nighttime operations allowed,  
large site=higher production rate.
- If the site background concentration of PM<sub>2.5</sub> is more than 9 µg/m<sup>3</sup> :  
Low annual production, daytime only operation, large site,  
additional controls (blue smoke etc.), detailed modeling reqd.

# New NAAQS impact on Amendment of NSR

- If the site background concentration of PM2.5 is less than 9:  
Increased production and new equipment are possible.
- If the site background concentration of PM2.5 is more than 9:  
Your permit is probably as good as it is going to get.  
Making additional changes may require reducing the existing production rate and adding additional controls.



# Lawsuits?

- US Chamber of Commerce v EPA filed on 3/6/2024
- The State of Texas and the TCEQ are listed as Petitioners (along with 24 other states and numerous other groups).
- Harris County is listed as an Intervenor for the EPA (along with 16 states, the Sierra Club and other groups).
- The action basically says that EPA did not use the correct procedures to make the NAAQS revision and that it did not explain why the standard was reduced to  $9\mu\text{g}/\text{m}^3$ .

# Other Sustainability Topics

- EPA announces \$160M in Grants to entities to improve EPDs for construction materials.  
<https://www.epa.gov/system/files/documents/2024-07/2024-epd-grant-summaries-ira-60112-final-7.15.24.pdf>
- Supreme Court overturns Chevron ruling – this ruling reduces federal agencies say on how they interpret the laws they administer. Courts are now supposed to rely on their own interpretations of law.
- City of Houston petitioned the TCEQ to require them to update their protectiveness reviews for all SP and PBRs within 1 year after any revision of the NAAQS. TCEQ denied the petition.

Questions?