

APPENDIX I

1.0 EMERGENCY EMISSION REDUCTION REGULATIONS

The following regulations define the actions that shall be taken by the general populace and by specific point sources to prevent the excessive buildup of air pollutant concentrations under each of the three episode severity levels when, and as, declared by the Director.

1.1 ALERT LEVEL

(a) General

(1) There shall be no open burning by any persons of tree waste, vegetation, refuse, or debris in any form.

(2) The use of incinerators for the disposal of any form of solid waste shall be limited to the hours between 12:00 noon and 4:00 p.m.

(3) Persons operating fuel-burning equipment which require boiler lancing or soot blowing shall perform such operations only between the hours of 12:00 noon and 4:00 p.m.

(4) Persons operating motor vehicles shall eliminate all unnecessary operations.

(b) Source Curtailment

(1) Any person responsible for the operation of a source of air pollutants listed below shall take all required control actions for this Alert level.

Source of Air Pollution	Control Actions
(1) Coal or oil-fired electric power generating facilities	a. Substantial reduction by utilization of fuel having low ash and sulfur content.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Substantial reduction by diverting electric power generation to facilities outside of Alert Area.

Appendix I

Source of Air Pollution	Control Actions
(2) Coal and oil-fired process steam generating facilities	a. Substantial reduction by utilization of fuels having low ash and sulfur content.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Substantial reduction of steam load demands consistent with continuing plant operations.
(3) Manufacturing industries of the following classification: Primary Metals Industry Petroleum Refining Operations Chemical Industries Mineral Processing Industries Paper and Allied Products	a. Substantial reduction of pollutants from manufacturing operations by curtailing, postponing, or deferring production and all operations.
	b. Maximum reduction by deferring trade waste disposal operations which emit solid particles, gas vapors or malodorous substances.
	c. Maximum reduction of heat load demands for processing.
	d. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.

1.2 WARNING LEVEL

(a) General

(1) There shall be no open burning by any person of tree waste, vegetation, refuse, or debris in any form.

(2) The use of incinerators for the disposal of any form of solid waste or liquid waste shall be prohibited.

(3) Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12:00 noon and 4:00 p.m.

(4) Persons operating motor vehicles must reduce operations by the use of car pools and increased use of public transportation and elimination of unnecessary operation.

(b) Source Curtailment

(1) Any person responsible for the operation of a source of air pollution listed below shall take all required control actions for this warning level.

Source of Air Pollution	Control Action
(1) Coal or oil-fired electric power generating facilities	a. Maximum reduction by utilization of fuels having lowest ash and sulfur content.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Maximum reduction by diverting electric power generation to facilities outside of Warning Area.
(2) Coal or oil-fired process steam generating facilities	a. Maximum reduction by utilization of fuels having the lowest available ash and sulfur content.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Making ready for use a plan of action to be taken if an emergency develops.
(3) Manufacturing industries which require considerable lead time for shut-down including the following classifications: Petroleum Refining Chemical Industries Primary Metals Industries Grain Industries Paper and Allied Products	a. Maximum reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operation.
	b. Maximum reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors, or malodorous substances.
	c. Maximum reduction of heat load demands for processing.
	d. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

Appendix I

Source of Air Pollution	Control Action
(4) Manufacturing industries which require relatively short lead times for shutdown including classifications: Petroleum Refining Chemical Industries Primary Metals Industries Grain Industries Paper and Allied Products	a. Elimination of air pollutants from manufacturing operations by ceasing, curtailing, postponing, or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment.
	b. Elimination of air pollutants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.
	c. Maximum reduction of heat load demands for processing.
	d. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

1.3 EMERGENCY LEVEL

(a) General

(1) There shall be no open burning by any persons of tree waste, vegetation, refuse, or debris in any form.

(2) The use of incinerators for the disposal of any form of solid or liquid waste shall be prohibited.

(3) All places of employment described below shall immediately cease operations:

a. Mining and quarrying of non-metallic minerals.

b. All construction work except that which must proceed to avoid emergent physical harm.

c. All manufacturing establishments except those required to have in force an air pollution emergency plan.

d. All wholesale trade establishments; i.e. places of business primarily engaged in selling merchandise to retailers, or industrial,

commercial, institutional or professional users, or to other wholesalers, or acting as agents in buying merchandise for or selling merchandise to such persons or companies, except those engaged in the distribution of drugs, surgical supplies and food.

e. All offices of local, county and state government including authorities, joint meetings, and other public bodies excepting such agencies which are determined by the chief administrative officer of local, county or state government, authorities, joint meetings and other public bodies to be vital for public safety and welfare and the enforcement of the provisions of this order.

f. All retail trade establishments except pharmacies, surgical supply distributors, and stores primarily engaged in the sale of food.

g. Banks, credit agencies other than banks, securities and commodities brokers, dealers, exchanges and services; offices of insurance carriers, agents and brokers, real estate offices.

h. Wholesale and retail laundries, laundry services and cleaning and dyeing establishments; photographic studios; beauty shops, barber shops, shoe repair shops.

i. Advertising offices, consumer credit reporting, adjustment and collection agencies; duplicating, addressing, blueprinting, photocopying, mailing, mailing list and stenographic services, equipment rental services, commercial testing laboratories.

j. Automobile repair, automobile services, garages.

k. Establishments rendering amusement and recreational services including motion picture theaters.

Appendix I

1. Elementary and secondary schools, colleges, universities, professional schools, junior colleges, vocational schools, and public and private libraries.

(4) All commercial and manufacturing establishments not included in this order will institute such actions as will result in maximum reduction of air pollutants from their operation by ceasing, curtailing, or postponing operations which emit air pollutants to the extent possible without causing injury to persons or damage to equipment.

(5) The use of motor vehicles is prohibited except in emergencies with the approval of local or state police.

(b) Source Curtailment

(1) Any person responsible for the operation of a source of air pollutants listed below shall take all required control actions for this Emergency level.

Source of Air Pollution	Control Action
(1) Coal or oil-fired electric power generating facilities	a. Maximum reduction by utilization of fuels having lowest ash and sulfur content.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Maximum reduction by diverting electric power generation to facilities outside of Emergency Area.
(2) Coal and oil-fired process steam generating facilities	a. Maximum reduction by reducing heat and steam demands to absolute necessities consistent with preventing equipment damage.
	b. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
	c. Taking the action called for in the emergency plan.

(3) Manufacturing industries of the following classifications: Primary Metals Industries Petroleum Refining Chemical Industries Mineral Processing Industries Grain Industry Paper and Allied Products	a. Elimination of air pollutants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment.
	b. Elimination of air pollutants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.
	c. Maximum reduction of heat load demands for processing.
	d. Maximum utilization of midday (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

1.4 MAJOR POINT SOURCES EMERGENCY REDUCTION PLAN

Any source of air pollution within the City of Omaha shall submit within thirty days of request by the Omaha Division of Permits and Inspection a plan designed to reduce or eliminate the emission of air pollutants in accordance with the objectives specified in Paragraphs 1.1, 1.2, and 1.3. Any source in the Nebraska portion of the Omaha-Council Bluffs Air Quality Control Region and not within the City of Omaha shall submit within thirty days of request by the Department a plan designed to reduce or eliminate the emission of air pollutants in accordance with the objectives specified in Paragraphs 1.1, 1.2, and 1.3. Each such plan shall be subject to review and approval by the Department. If, in the opinion of the Department, a submitted plan does not effectively carry out the objectives specified, the Department may disapprove it, state reasons for disapproval and require preparation of an amended/revised plan within a specified time period.

(a) Plan Description

Each plan shall be submitted in writing, shall identify the emitted pollutants, shall state the approximate amount (percentage) of expected reduction of pollutants and shall briefly describe the manner, method or technology employed to achieve the reduction

Appendix I

during each severity level of an episode. Each plan, when approved by the Department, is (becomes) legally enforceable. During declared episodic conditions, a copy of the plan for a given source shall be made available on source premises to any person(s) authorized to enforce the provisions of the plan.

- (b) Emergency Reduction Plans will be obtained from point sources within one (1) year after submission of this Plan. These will be submitted in semi-annual progress reports until such legally enforceable schedules are obtained from all point sources.

2.0 EMERGENCY ACTION CENTER COMMUNICATION AND CONTROL PROCEDURES

The following paragraphs of the Emergency Episode Plan are designed to "stand alone" as a "Manual of Operation" for the Omaha-Council Bluffs Interstate AQCR. It should be separated, reproduced and distributed as required to those members of the Emergency Episode team as designated by the Director.

2.1 COMMUNICATIONS

The functioning of the Emergency Action System is primarily that of maintaining and coordinating the communications between and among the various public agencies, the U.S. Weather Bureau Station, hospital and medical facilities, the emitting sources, the air quality monitoring station, news media, and the Emergency Action Center (EAC). Control of the system is focused in the EAC. This part of the manual services to define the system communication requirements, the means to fulfill these requirements and the responsibilities of the operating personnel.

2.1.1 REQUIREMENTS

Communication facilities of the EAS are provided by the Northwestern Bell Telephone Company and the Teletype Network established by the Weather Bureau. Unlisted number telephone lines will be made available in the EAC to allow access to the center only by authorized members of the System. This will preclude tying up the center phones with non-essential traffic.

(a) Meteorological Information

The U.S. Weather Bureau Station at Eppley Field enters meteorological information into the EAS via their local Teletype Network in the form of forecasts, advisories and bulletins. These inputs are made as often as a developing situation/episode demands. A terminal will be located in the EAC and connected to this network. The weather information is received in the EAC, evaluated and logged. Action responses to each weather input are, of course, by the nature of the report and the situation at the time of receipt. Added detail may be requested of the weather station by the EAC via direct telephone communication if and when necessary.

(b) Air Quality Information

The normal reporting frequency of the various stations in the Air Quality Monitoring/Surveillance network is accelerated when first indications of a possible episode occurrence are recognized. Indications can be either the HAPP advisory from the weather station or an unusually severe pollutant level reached at any one or more station of the Air Quality Network. At the direction of the EAC director, the surveillance stations will employ, as appropriate, either messengers or the telephone to send their observations and/or reports to the processing center (at the Public Health Department) in accordance with the schedule required by the severity of the situation.

(c) Directives

Instruction to emitting sources, police, medical facilities, and Air Quality Monitoring Station operators will be issued by the EAC as the situation dictates. The Communication Check List for each severity level of the episode will guide the EAC director/staff in issuing the necessary directives and instructions. Communication Check Lists are described under Paragraph 2.1.2. Telephone communication with each of the necessary contacts will provide the means to fulfill this requirement; however, police two-way radio facilities will be included as needed, dependent on the severity of the situation.

Appendix I

(d) Public Information

The requirement to inform the populace of the situation in case of an episode occurrence, and to direct their appropriate/mandatory responses is met through local press, radio and television facilities. The declaration statement appropriate to each severity level is issued by the EAC director for immediate publication. A press release is then prepared and released to the media (via the office of UPI in Omaha) to provide the explanatory and instructive information supporting the declaration statement.

(e) Effectiveness Reporting

The need for the EAC to monitor the effectiveness of abatement actions and to access the adherence to planned strategies of sources is fulfilled by the Permits and Inspection Division field inspectors supplemented by the police. Reporting of apparent violators or obvious ineffective results will be via telephone or police radio to the EAC. Dependent on the circumstances reported, the EAC will issue orders or instructions to correct the reported deficiency or violation using the same channels of communication.

2.1.2 PROCEDURES

For each of the episode levels, the procedures to be followed are centered in the use of a pair of forms. These forms are titled "Declaration Sheet" and "Communication Check Lists". The paragraphs which follow describe their use and the pertinent communication functions during each phase or level of an episode.

(a) Forecast

When the possibility of an air pollution episode is first recognized a "Forecast Declaration Sheet" is posted on the EAC "Action Board". Entries are made on the sheet as follows:

(1) Upon receipt of an advisory from the Weather Bureau forecasting possibility of an episode, enter the time and date information and the summary of the significant points in the advisory in the required

spaces. Post the sheet on the EAC Action Bulletin Board; or

(2) Record unusually high levels of pollution as reported by stations in the Air Quality Surveillance Net in the spaces provided. Evaluate this data, when sufficient to recognize a trend, and determine whether a "forecast" should be declared. If declared,

(3) Prepare and enter the "Forecast Declaration Statement" on the sheet in the appropriate spaces. The content of the statement must clearly define the probable affect areas, contain the significant points from the Weather Bureau Forecast and the type of the pollutant(s) which appears to be of greatest concern. The statement should also stress that immediate action on the part of the public is not indicated.

(4) Update the sheet as additional surveillance or meteorological information is received and evaluated.

(5) Keep the sheet posted until either a decision to declare an ALERT is made or the possibility that episode conditions will develop has disappeared.

(6) Enter the time of ALERT or Termination, remove the sheet from the board and file in the episode log.

When the "Forecast Declaration Statement" has been composed and entered on the "Notice" sheet (step 3 above), the "Forecast Communications Check List" is posted and:

(1) EAC staff members will begin making the telecons as indicated on the list. Contact must be completed with the heads of agencies listed in the first group of the sheet. The remaining contacts to be completed will be selected by the director of EAC based on his estimate of the situation.

(2) As each telecon is completed, the caller will initial and enter the time of completion in the appropriate column spaces next to the called number.

(3) The sheet will remain posted until either an ALERT or Termination is declared. When removed, the

Appendix I

sheet will be filled with the Declaration sheet in the episode log book.

Determination of specific actions to be taken during the period of an Episode Forecast involves many factors which will vary with each Forecast situation. Therefore, they cannot be considered in this planned set of procedures. However, some general guides are included below:

(1) Although it should not be necessary to put all members of the Emergency Action team on duty during a Forecast situation each member should be notified of the possibility/probability of spending extra duty time should the situation worsen.

(2) Selection of emitting sources to be notified should take into consideration the length of lead time each may need to implement their emergency reduction plans.

(3) Any press release(s) supporting the declaration statement should emphasize that only a "conservative" response by the public is called for.

(b) Alert

When air quality deteriorates and meteorological forecasts indicate a continuing air stagnation (See Chapter 25, 003 preceding for detailed criteria) the procedures below should be followed to declare an Air Pollution Alert:

(1) Remove the Forecast Notification Sheet and Communication Check List from the EAC Action Board and post the ALERT DECLARATION SHEET and ALERT Communication Check List in their places.

(2) Prepare and enter the Declaration Statement on the sheet. Emphasize the need for people with respiratory, cardiac and related health deficiencies to safeguard their well-being. Briefly summarize steps to be taken by drivers of private cars, industry, etc. to reduce pollution and include an estimate of the duration of the "Alert".

(3) Enter times and dates in the required spaces.

(4) Keep the sheet posted until either the situation worsens to the point where a "Warning" must be declared or conditions improve to warrant declaration of "Termination".

(5) Begin making the required telecons as defined on the Alert Communication Sheet. Follow the Procedures outlined for the Forecast telecons (2.1.2(a) preceding).

(6) Maintain both forms on the EAC Action Board until either a Warning or Termination is declared. Then remove and file both in the Episode Log.

General guides to actions of the EAC during "Alert":

(1) Convene all members of the EAS team for a briefing and assign a full field inspection team to insure compliance with reduction plans of the major pollution sources.

(2) Request the Northwestern Bell Telephone Company to dedicate lines between the EAC and Weather Bureau, Health Center, Processing Center, Police Department, Civil Defense Headquarters and the Mayor's Office.

(3) Ready and release press notices regularly.

(4) Request reports of the major pollution sources regarding their individual progress in implementation of their reduction plans.

(5) Insure that all Air Quality Surveillance stations are adequately manned and reporting according to the Alert accelerated schedule.

(6) Establish and maintain the map(s)/display(s) necessary to keep close observation of the situation progress.

(c) Warning

If/When pollution concentrations reach the levels defined for declaration of a "Warning" and meteorological data indicates a continuation of Stagnation (see Chapter 25, 003 for criteria), the

Appendix I

following procedures are necessary in declaring the "Warning" status:

- (1) Remove the Alert Declaration and Communication Check List sheets from the EAC Action Board and replace them with the WARNING DECLARATION SHEET and Communication Check List. File the Alert sheets in the Episode Log.
- (2) Prepare and enter the Warning Declaration Statement. Emphasize the extreme caution anyone with health problems must take and include the emergency telephone number(s) to be called for medical/rescue aid. State the mandatory steps to be taken by the public, the pollution sources and emergency services (hospitals, doctors, police, fire and Civil Defense agencies).
- (3) Enter times and dates as required by the forms.
- (4) Accelerate placement of the telecons required on the Warning Communication Check List.
- (5) Maintain both forms with all weather and Air Quality/Emission control updates.

General Guides to EAC actions during the "Warning":

- (1) Insure that adequate staffing of the EAC and processing center is maintained. Augment with "volunteer" help as needed.
- (2) Convey the urgency of the situation to all participating members of the EAS.
- (3) Alert hospitals, medical personnel, rescue squads, fire and police departments, Civil Defense units, etc. to the need for rapid response to calls for aid.
- (4) Issue hourly bulletins to press, radio and television facilities stating the progress of the total situation. Emphasize need to adhere to all directives/instructions regarding reduction of pollution and prevention of any further deterioration of air quality. Repeat emergency telephone numbers.

(5) Request police enforcement of all regulations and immediate reporting of violations, degrading incidents, etc. and action(s) taken.

(6) Request regular reports from emission sources of their reduction measures and resulting effectiveness.

(7) Continue all procedures outline for the Alert level not specifically changed above.

(d) Emergency

If the episode severity reaches this level, a total state of emergency must be assumed by the entire area affected. Procedures for posting and maintaining the Emergency Declaration Statement sheet and Communication Check List are the same as for the "Warning" level. The role of the EAC at this Emergency state becomes one of supporting the Office of Mayor, and all area agencies in carrying out emergency measures primarily concerned with protection of public safety. Thus, the EAC and all members of the EAS must be geared to the most rapid response possible for request from these agencies.

(e) Termination

Except for episodes caused by unusually high emissions from one or more specific sources, termination of any level of episode severity will occur only with an improvement in meteorological conditions. Thus, observations of the Weather Bureau, indicating imminent improvement in the stagnation causes is the major factor in terminating the episode. Procedures for declaring termination are similar to those defined previously for declaring any other level. The Termination Declaration Sheet and Communication List are posted in place of the last episode level sheets. The most important requirement in making the required telecons is to insure that all contacts made during any and all previous episode stages are recontacted to convey the relaxation of the instruction/directives then imposed.

Appendix I

(f) Episode Reporting

Following termination of an episode of any level of severity, a report must be prepared for the Director's signature including:

- (1) Summary of significant events, including dates and times, identification of difficulties, effectiveness of reduction actions, etc.
- (2) Summary of estimated costs to:
 - a. EAC-EAS
 - b. Other public agencies involved
 - c. Sources
 - d. Public response
 - e. Detrimental health results - casualties, etc.

This report must be submitted to the Environmental Protection Agency, Region VII, E.P.A., Durham, and to the Nebraska Department of Environmental Quality within ten (10) days of the termination date.

Appendix I

COMMUNICATION CHECK LIST
FORECAST

ALERT level declared at: _____ on _____
Time Date

The following telecons must be made from the EAC immediately upon declaration of ALERT level to inform each contact of the ALERT Declaration Statement.

Office/Individual To Be Called	Area Code	Phone Number	Caller's Initials	Time
Supt. Permits & Inspections, Public Safety - Omaha	402	444-5378		
Chief, Environmental Health, Omaha-Douglas County Health	402	444-7485		
Director, Environmental Quality, State of Nebraska - Lincoln	402	471-2186		
Chief, Air Program EPA, Region VII Kansas City	913	551-7020		
Director, Dept. of Environmental Quality State of Iowa - Des Moines	515	281-8853		
Governor, State of Nebraska - Lincoln	402	471-2244		
Director, Douglas Co. Health - Omaha	402	444-7471		
Director of Health, State of Nebraska - Lincoln	402	471-2133		
Chairman, Environ. Quality Council, Nebraska - Lincoln	402	471-2186		
Assistant Director Air Pollution Control Nebraska Dept. of Environ. Quality - Lincoln	402	471-2186		
O.P.P.D. (Request liaison contact and forecast of power demand) - Omaha	402	552-5612		
Metropolitan Utilities District - Omaha	402	449-8000		

COMMUNICATION CHECK LIST

EMERGENCY

Office/Individual To Be Called	Area Code	Phone Number	Caller's Initials	Time
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Recontact all names/offices on FORECAST, ALERT, WARNING lists, then call the following:

Director, Air Pollution Control, Lincoln-Lancaster Co. Health Dept. - Lincoln	402	441-8001		
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Board of Education Dist. 1, Omaha Public Schools	402	554-1111		
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Dist. 66, 78th & Cass - Omaha	402	391-0646		
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SOURCES:

Contact all sources to stress urgency of complete and immediate compliance with reduction plans.

NEWS MEDIA:

Release hourly bulletins to keep public fully aware of situation developments.

Appendix I

COMMUNICATION CHECK LIST

WARNING

WARNING level declared at: _____ on _____
Time Date

The following telecons must be made from the EAC immediately upon declaration of WARNING level to inform each contact of the Warning Declaration Statement.

Office/Individual To Be Called	Area Code	Phone Number	Caller's Initials	Time
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Recontact all names/offices on both FORECAST and ALERT lists, then call the following:

Chief of Police - City of Omaha	402	444-5666		
Chief of Police - City of Council Bluffs	712	328-4701		
Chief of Fire Dept.	402	444-5708		

SOURCES:

Contact all sources
(determine most likely
to contribute to affected
areas) to implement
reduction plans immediately.

NEWS MEDIA:

Recontact UPI to release
new DECLARATION STATEMENT/
Stress urgency of situation.
