

**NARRATIVE WORK PLAN/PROPOSAL**  
**Notice of Solicitation #OAR-EMAD-03-08, Amendment 2**

**I. Applicant**

Capital Area Planning Council (CAPCO)  
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**II. Project Name**

Austin—Round Rock Toxics Study (ARTS)

**III. Eligibility**

The Capital Area Planning Council (CAPCO) was organized in 1970 to serve local governments in its ten-county region, known as State Planning Region 12. CAPCO is a regional planning commission organized under Chapter 391, Local Government Code, and is one of 24 within the State of Texas. CAPCO is commonly referred to as a Council of Governments (COG).

Councils of Governments are voluntary associations of counties, cities, and special districts formed under Texas law. These associations deal with the problems and planning needs that cross the boundaries of individual local governments or that require regional attention. Although known by several different names, including council of governments, regional planning commissions, associations of governments and area councils, they are most commonly referred to as "COGs".

A council of governments is defined by law as political subdivision of the state, but it has no regulatory power or the authority possessed by cities, counties or other local

governments. Decisions by a council of governments are not binding on member governments.

**Of the types of entities described in Clean Air Action Section 302(b), CAPCO functions as and qualifies as “an agency of two or more municipalities located in the same State or in different States and having substantial powers or duties pertaining to the prevention and control of air pollution.”**

The primary focus of CAPCO is to serve as advocate, planner and coordinator of initiatives that, when undertaken on a regional basis, can be more effective and efficient. These include emergency services, elderly assistance, law enforcement training, criminal justice planning, solid waste reduction, infrastructure development, housing and economic development, and air pollution prevention and control.

Another example of the planning and coordinating functions of CAPCO is the role played by CAPCO to bring together a number of central Texas cities and counties to participate with the Texas Commission on Environmental Quality (TCEQ) and the U. S. Environmental Protection Agency as signatories to an Early Action Compact to develop preventive measures to help the region avoid going into ozone nonattainment status. The signatories to the Early Action Compact were the cities of Austin, Bastrop, Elgin, Lockhart, Luling, Round Rock, and San Marcos and Bastrop, Caldwell, Hays, Travis, and Williamson counties. CAPCO has also played a lead coordinating role in regard to establishing an ambient air monitoring program with monitoring sites in Fayette County and in the cities of Dripping Springs, Texas and Pflugerville, Texas (both just outside of Austin, Texas).

CAPCO intends, if awarded a grant from the EPA's National Air Toxics Monitoring Community Assessments Program, to play a similar coordinating role in regard to obtaining permissions from cooperating municipalities or counties, arranging site lease agreements/agreements, as required, and in arranging for and managing the subcontract that will be let, following competitive procurement procedures, to perform the air toxics monitoring tasks described in EPA's Notice of Solicitation #OAR-EMAD-03-08, Amendment 2.

#### **IV. Cooperation**

CAPCO understands and agrees that there may be "substantial Federal involvement" on the part of the U.S. Environmental Protection Agency (EPA) and welcomes that partnership opportunity. CAPCO specifically understands that this federal involvement may involve: close monitoring of CAPCO's performance; collaboration during the performance of the scope of work; approval by EPA of the substantive terms of proposed contracts; approval of the qualifications of key personnel; and review and comment on any reports prepared for this project.

#### **V. Amount of Funding Requested**

\$380,397

## **VI. Project/Study Time Line**

The proposal is to begin this project/study in September 2004 and for the project to be eighteen months (18) in duration with the monitoring work to last for twelve (12) months.

## **VII. Scope of Work**

### **A. Preparation of QAPP**

CAPCO will have a subcontractor prepare a Quality Assurance Project Plan (QAPP) for this project that will be specific to the study area and the QAPP will be submitted to EPA for review and approval prior to the start of monitoring activities

### **B. HAPs to be Monitored**

CAPCO will subcontract to monitor the toxic VOCs, carbonyls, and metals short list which is found in Notice of Solicitation #OAR-EMAD-03-08 and the *National Air Toxics Monitoring Strategy*, Draft January 9, 2004, page 35. These lists include the following hazardous air pollutants:

benzene	vinyl chloride	formaldehyde
carbon tetrachloride	arsenic and compounds	acrolein
chloroform	beryllium and compounds	acetaldehyde
1,3 butadiene	cadmium and compounds	
1,2-dichloropropane	hexavalent chromium	
methylene chloride	lead and compounds	
tetrachloroethylene	manganese and compounds	
trichlorethylene	nickel and compounds	

### **C. Colocation**

The original work plan is to include one additional monitor at one of the five proposed monitoring sites for quality assurance purposes. Thus, this colocation

plan of collocating 20 percent of the total monitors will meet the suggested EPA guideline of 10 percent collocation.

**D. Proposed Monitoring Sites and Number of Monitors**

CAPCO is fortunate to have a number of local, interested parties that are willing to provide assistance and support with this project. The Texas Commission on Environmental Quality (TCEQ) and the City of Austin have agreed to help CAPCO in making final selections of monitoring sites in Austin and Round Rock. In addition, Travis County, the City of Round Rock, the Austin Independent School District, and the Lower Colorado River Authority have all agreed to assist in making locations available for potential monitoring sites.

At this time the plan is to place monitors at the following locations in Austin and Round Rock. These site locations are subject to change depending on input from U.S. E.P.A., TCEQ, the City of Austin, Travis County, and the City of Round Rock.

- 1 monitor at Austin-Bergstrom International Airport (industrial site)
- 2 monitors at, or around, the University of Texas at Austin (densely populated area especially during daytime hours)
- 1 monitor in the Montopolis neighborhood in Austin, Texas (background and environmental justice site)
- 2 monitors on IH 35 South at Ben White Boulevard (mobile source site)
- 1 monitor on IH 35 North at FM 1325 (commercial site)

There will be a total of seven monitors with the monitors at the University of Texas site being of the same type in order to meet the collocation quality assurance goal expressed in the solicitation. The second monitor at the Ben White Blvd. site will be a monitor dedicated to sampling for metal compounds.

### **E. Sampling Plan**

The method TO-15 sampling will consist of approximately 36 samples (30 samples, 3 duplicates, and 3 replicates) collected during 24-hour periods every 12 days. The method TO-11A and IO-3.5 sampling for carbonyls, metals, and hexavalent chromium will consist of approximately 48 samples (30 samples, 3 duplicates, 3 replicates, and 12 field blanks) per year taken during 24 hour periods every 12 days.

### **F. How the Proposal Meets the Criteria Set Out in the Solicitation in Section V**

The proposed monitoring activities will serve to “clarify[ing] spatial concentration pattern of key hazardous air pollutants within urban areas” and address the first criterion mentioned in the solicitation is that the proposed monitoring sites will “cover” a broad area of Austin and part of the City of Round Rock and part of the area outlying Austin (Austin-Bergstrom International Airport). Moreover, the sites selected are targeted to meet the goals of the NATTA monitoring because an industrial site, a commercial site, a background site, sites with heavy mobile source concentration, and a heavily populated area have been tentatively selected. Some of the sites selected will enable data analysts to characterize spatial differences in pollutant concentrations that are “driven by factors such as proximity to major roadways.” Emissions from diesel truck traffic have long been a subject of interest in regard to traditional SIP

inventory work and air quality modeling. There is at least some possibility that toxic emissions from so-called NAFTA truck traffic may be significant, particularly given the volume of traffic on IH 35, the major north to south corridor through Austin and Round Rock. This may also provide an opportunity to characterize pollutants that are not ubiquitous everywhere, yet remain a problem on a national scale (e.g., toxic emissions from diesel trucks and automobiles in general) on a heavily traveled roadway.

As regards the second criterion in the solicitation, “projects developed to either pre-or post-monitor for a planned air toxic reduction project, or correlating results with the community’s effort at characterizing air toxic risk,” the central Texas area has been a leader in adopting an Early Action Compact and in developing a Clean Air Action Plan (CAAP) to reduce emissions. While the CAAP is actually directed at VOC and NO<sub>x</sub> emissions, the reductions planned as part of the Plan may double as reductions measures that will affect the levels of toxic emissions in the area. Some of these include, if ultimately implemented, reductions in emissions due to Stage I vapor recovery, degreasing controls, autobody finishing controls, low Reid vapor gas, BACT and offsets for new or modified point sources, the Texas Emission Reduction Program (TERP) to provide grants to measures that achieve two tons per day of NO<sub>x</sub> emissions, power plant reductions agreed to by Austin Energy, the Lower Colorado River Authority, and the University of Texas at Austin, and an Inspection and Maintenance (I/M) program targeted at the Austin—Round Rock area’s major source of emissions: automobiles.

Of special interest as regards the goals expressed regarding the NATTS, may be the proposed idling restrictions on heavy-duty diesels that have been included in the CAAP, which will reduce on-road NOx emissions, PM, and toxic emissions. This particular reduction measure is one that was adopted at the urging of local citizens concerned about extended idling of trucks in neighborhood areas of Austin. Surveys undertaken during the development of the CAAP showed that this reduction measure was the most preferred alternative for reducing emissions.

CAPCO is willing to consider such comparisons of modeling data to monitored data as may be feasible within the scope and budget of this project. It would be helpful to have input from EPA as to what modeling data sets has been collected that will avail themselves to such comparisons. Though no specific line item has been included in the project budget for these comparisons it may be possible, after receiving input from EPA, to “adjust” some part of the project budget to allow these comparisons to be made (addressing a third criterion set out in the solicitation).

Other possibilities suggested by the solicitation that may be of interest might include use of the extensive quasi-SIP air quality modeling data sets developed on behalf of CAPCO for the Clean Air Action Plan. Although, again, most of the focus of this modeling has been on VOC and NOx modeling there is some overlap or even identity between sources of VOC and NOx emissions and sources of air toxic emissions. CAPCO is certainly willing to explore these possibilities with EPA staff and to make available any of the air quality modeling data that has been

developed for the five-county central Texas area, which includes Bastrop, Caldwell, Hays, Travis and Williamson counties.

#### **G. Reporting Requirement**

CAPCO will report the monitoring data collected during the twelve (twelve) month monitoring period on a quarterly basis, in January, April, July, and October for the previous quarter, 90 days after the end of each quarter.

#### **H. Emissions Inventory Requirement**

CAPCO will subcontract to have toxic emissions inventory data developed for the years 2002, 2005, and 2008 for Travis and Williamson counties. Since no specific guidelines have been provided as to what level of inventory work the EPA wanted completed, the assumption (and this is what the budget covers) is the development of a 2002 base year inventory and “projection” inventories for 2005 and 2008 by multiplying 2002 emissions by growth factors.

#### **I. Final Report and Presentation**

CAPCO will subcontract to provide a final report to EPA that includes a discussion and of the monitoring/sampling results, analysis of the monitoring, which will relate the monitored air toxics to potential population risk/health effects. The report will also include graphical presentations of the data as appropriate. In addition, a presentation of the data and results will be prepared that will be suitable for presentation at the EPA’s annual data analysis workshop and staff will be made available to make that presentation in Research Triangle Park, North Carolina or such other location as may be chosen by EPA.