

FINAL NATURAL EVENTS ACTION PLAN

FOR

HIGH WIND EVENTS

ALAMOSA, COLORADO



**Colorado Department
of Public Health
and Environment**

**CITY OF ALAMOSA,
ALAMOSA COUNTY,**

and

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ALAMOSA NATURAL EVENTS ACTION PLAN

I. EXECUTIVE SUMMARY

On March 31 and April 9, 1999 and again on April 18 and December 17, 2000, the monitor located in Alamosa, Colorado recorded exceedances of the 24-hour National Ambient Air Quality Standard (NAAQS) for PM₁₀ (particulate matter having a nominal aerodynamic diameter equal to or less than 10 microns).¹ Each of these exceedances was associated with high winds and blowing dust in the Alamosa area.

Recognizing that certain uncontrollable natural events, such as high winds, wildfires, and volcanic/seismic activity can have on the NAAQS, the Environmental Protection Agency (EPA) issued a Natural Events Policy (NEP) on May 30, 1996. The NEP sets forth procedures through the development of a Natural Events Action Plan (NEAP) for protecting public health in areas where the PM₁₀ standard may be violated due to these uncontrollable natural events. The guiding principles of the policy are:

1. Federal, State, and local air quality agencies must protect public health;
2. The public must be informed whenever air quality is unhealthy;
3. All valid ambient air quality data should be submitted to the EPA Aerometric Information Retrieval System (AIRS) and made available for public access;
4. Reasonable measures safeguarding public health must be taken regardless of the source of PM₁₀ emissions; and,
5. Emission controls should be applied to sources that contribute to exceedances of the PM₁₀ NAAQS when those controls will result in fewer violations of the standards.

In response to Alamosa's four exceedances of the PM₁₀ NAAQS in 1999 and 2000, the Colorado Department of Public Health and Environment's Air Pollution Control Division (Division), in conjunction with the City of Alamosa, Alamosa County, and other agencies developed a NEAP for the Alamosa area. The referenced NEAP was developed based on Natural Events Policy that calls for states to "develop a NEAP for any area where natural events cause or have caused a PM₁₀ NAAQS to be violated within eighteen (18) months of the date of the violation." April 18, 2000 was the triggering event for the development of the NEAP. The referenced NEAP was developed and submitted to EPA in October 2001. A revised version of the NEAP (including U.S. EPA recommendations) was submitted February 2002. A copy of the letter of concurrence for these submittals is available in the Appendix.

The Natural Events Policy also indicates that in attainment areas (such as Alamosa), best available control measures (BACM) must be implemented within three (3) years after the

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triggering event. With that, this *Final Natural Events Action Plan for Alamosa, Colorado* includes BACM not identified in the February 2002 submittal and includes additional efforts in the community to limit blowing dust and its impacts on public health.

The *Final Natural Events Action Plan* also addresses PM10 exceedances experienced in the area that have occurred since the December 17, 2000 event.

The plan provides analysis and documentation of the exceedances as attributable to uncontrollable natural events due to unusually high winds. In addition, the NEAP is designed to protect public health, educate the public about high wind events; mitigate health impacts on the community during future events; and, identify and implement Best Available Control Measures (BACM) for anthropogenic sources of windblown dust.

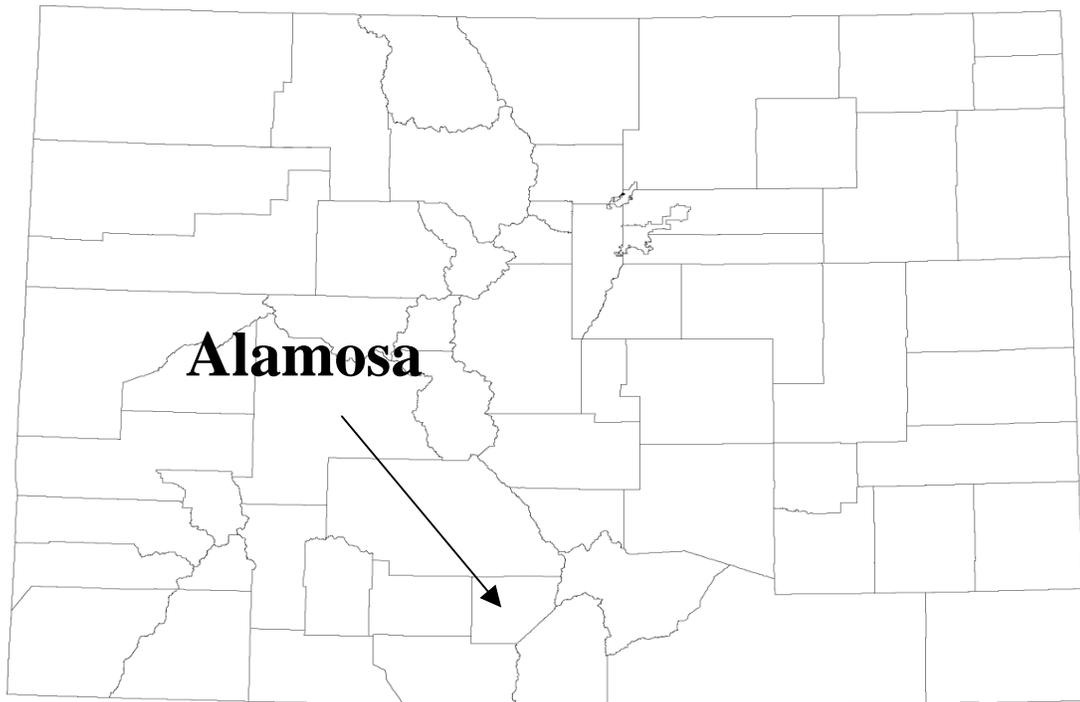
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II. INTRODUCTION

The City of Alamosa is located in Alamosa County in south central Colorado. Situated in the San Luis Valley, Alamosa serves as one of the largest cities and the agricultural center for south central Colorado. The area surrounding Alamosa consists of gently rolling to nearly level uplands where the dominant slopes are less than 3 percent.² The climate is generally mild and semiarid. Annual precipitation is about 7.5 inches. Summers are considered short and cool, with winters long and cold. In winter and spring, windstorms are common, especially in drier years. It is due to these high velocity windstorms that Alamosa experiences most of the PM10 problems for the area.

Area Map



On March 31 and April 9, 1999 and again on April 18 and December 17, 2000 the PM10 monitor located on the roof of Alamosa's Adams State College recorded exceedances of the primary 24-hour NAAQS for PM10. The PM10 concentrations of $263 \mu\text{g}/\text{m}^3$, $190 \mu\text{g}/\text{m}^3$, $238 \mu\text{g}/\text{m}^3$, and $217 \mu\text{g}/\text{m}^3$ respectively, were recorded on these days - as were unusually high wind speeds and little or no precipitation. The circumstances surrounding the Alamosa exceedances has provided

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adequate reason for the Division to believe the high wind events and blowing dust have caused exceedances of the NAAQS that otherwise would not have occurred.

As required by the NEP, each of the exceedances was flagged by the Division's Technical Services Program in the AIRS system. The flags appear after the recorded values in AIRS with the descriptor code "A" for high winds. According to EPA guidance the type and amount of documentation provided for each event should be sufficient to demonstrate that the natural event occurred, and that it impacted a particular monitoring site in such a way as to cause the PM10 concentrations measured.³ This documentation has been previously submitted to EPA.

Recognizing the need to protect public health in areas where PM10 exceeds the NAAQS due to natural events such as the unusually high winds, a Natural Events Action Plan has been developed for the Alamosa area based on the NEP guidance. This plan outlines specific procedures to be taken in response to future high wind events. In short, the purpose of the plan is to:

1. Educate the public about the problem;
2. Mitigate health impacts on exposed populations during future events; and
3. Identify and implement Best Available Control Measures (BACM) for anthropogenic sources of windblown dust.

A. Background

High winds are common to the southern region of Colorado. Under some conditions, these winds are strong enough to lift particulate matter into the air and cause elevated levels of PM10 above the Federal and State standards. Due to observed problems in Alamosa, particulate monitoring of total suspended particulate pollution was instituted at the Adams State College monitoring site in 1970. In 1989, monitoring for PM10 began.

More recently, an additional monitoring site has been established in the Alamosa area. Specifically, a second PM10 monitor was established at the Alamosa Municipal Building to ensure adequate coverage of local air quality monitoring and to ensure protection of public health. This monitor, like the first PM10 monitor at Adams State College, operates on an everyday sampling protocol.

Alamosa's monitoring history shows that the annual PM10 standard of 50 $\mu\text{g}/\text{m}^3$ (averaged over an annual period) has never been exceeded. The 24-hour PM10 standard of 150 $\mu\text{g}/\text{m}^3$ has been exceeded on a number of occasions. However, all exceedances have been due to natural events. The associated weather conditions on each of the exceedance days conform to a repeated pattern of regional high winds and blowing dust. In each case an intense, fast-moving, surface low-pressure system tracked through Colorado. Typically these systems had surface lows that were

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not collocated with a closed upper low or nearly-closed upper level trough. This distinction is important because the collocated or vertically “coupled” systems usually bring significant up slope snow or rain to the region. The intensity of the lows associated with the PM10 exceedances is evident in the average central pressure of 990 mb (corrected to sea level). This value is typical of a deep, well-organized system. Such well-organized systems usually generate high winds in the vicinity of the low center.⁴

The NEP applies only to emissions caused by natural events that have occurred since January 1, 1994.⁵ Only those high wind events experienced since that time are addressed by this NEAP. This submittal includes those exceedances occurring since the previous NEAP submittal as well. See table on page 6 for more details of all area exceedances.

B. The Natural Events Policy

1. Background

On May 30, 1996, EPA issued the Natural Events Policy in a memorandum from Mary D. Nichols, Assistant Administrator for Air and Radiation. In this memorandum EPA announced its new policy for protecting public health when the PM10 NAAQS are violated due to natural events. Under this policy three categories of natural events are identified as affecting the PM10 NAAQS: (1) volcanic and seismic activity; (2) wildland fires; and, (3) high wind events. Only high wind events will be addressed in this NEAP.

Based on EPA’s natural events policy high winds are defined as uncontrollable natural events under the following conditions: (1) the dust originated from non-anthropogenic sources; or, (2) the dust originated from anthropogenic sources controlled with best available control measures (BACM). Furthermore, the conditions that create high wind events vary from area to area with soil type, precipitation, and the speed of wind gusts.⁶

2. Content

In order for exceedances of the NAAQS to be considered as due to a natural event, a Natural Events Action Plan must be developed to address future events. The following is a summary of the specific EPA guidance regarding development of a NEAP.⁷

1. Analysis and documentation of the event should show a clear causal relationship between the measured exceedance and the natural event. The type and amount of documentation provided should be sufficient to demonstrate that the natural event occurred, and that it

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impacted a particular monitoring site in such a way as to cause the PM10 concentrations measured.

2. Establish education programs. Such programs may be designed to educate the public about the short-term and long-term harmful effects that high concentrations of PM10 could have on their health and inform them that: (a) certain types of natural events affect the air quality of the area periodically, (b) a natural event is imminent, and (c) specific actions are being taken to minimize the health impacts of events.
3. Minimize public exposure to high concentrations of PM10 through a public notification and health advisory program. Programs to minimize public exposure should (a) identify the people most at risk, (b) notify the at-risk population that a natural event is imminent or currently taking place, (c) suggest actions to be taken by the public to minimize their exposure to high concentrations of PM10, and (d) suggest precautions to take if exposure cannot be avoided.
4. Abate or minimize appropriate contributing controllable sources of PM10. Programs to minimize PM10 emissions for high winds may include: the application of BACM to any sources of soil that have been disturbed by anthropogenic activities. The BACM application criteria require analysis of the technological and economic feasibility of individual control measures on a case-by-case basis. The NEAP should include analyses of BACM for contributing sources. If BACM are not defined for the anthropogenic sources in question, step 5 listed below is required.
5. Identify, study, and implement practical mitigating measures as necessary. The NEAP may include commitments to conduct pilot tests of new emission reduction techniques. For example, it may be desirable to test the feasibility and effectiveness of new strategies for minimizing sources of windblown dust through pilot programs. The plan must include a timely schedule for conducting such studies and implementing measures that are technologically and economically feasible.
6. Periodically reevaluate: (a) the conditions causing violations of a PM10 NAAQS in the area, (b) the status of implementation of the NEAP, and (c) the adequacy of the actions being implemented. The State should reevaluate the NEAP for an area every 5 years at a minimum and make appropriate changes to the plan.
7. The NEAP should be developed by the State in conjunction with the stakeholders affected by the plan.
8. The NEAP should be made available for public review and comment and may, but is not required, to be adopted as a revision to the State Implementation Plan (SIP) if current SIP

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rules are not revised.

9. The NEAP should be submitted to the EPA for review and comment.

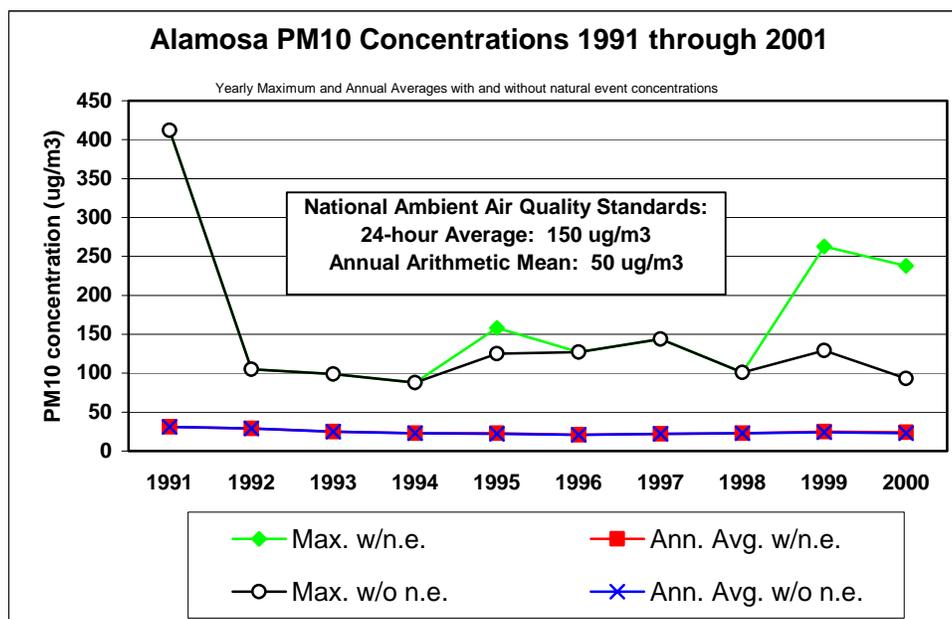
The following text describes the Alamosa NEAP and its conformance with the above-described EPA guidance on natural events.

III. NATURAL EVENTS ACTION PLAN

A. Element 1: Documentation & Analysis

On March 31 and April 9, 1999 and again on April 18 and December 17, 2000, the air quality monitor located in Alamosa, Colorado recorded exceedances of the 24-hour National Ambient Air Quality Standard (NAAQS) for PM₁₀ (Figure 1). Each of these exceedances was associated with unusually high winds in the Alamosa area (Table 1).

Figure 1. Recent Alamosa PM₁₀ Concentrations



n.e.- Natural Event

On October 29, 1999 and again on March 30, 2000 the Division submitted documentation to EPA Region VIII in support of Alamosa's most recent exceedances of the PM₁₀ NAAQS due to

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natural events. The documentation contained monitoring data, meteorological data, PM10 filter analysis and receptor model results, maps of the area, news accounts of the events and other miscellaneous supporting material. On July 3, 2001, EPA concurred that the aforementioned natural events were, in fact, high wind events (Table 1). The EPA letter of concurrence can be found in the Appendix of this NEAP.

More recently (since the February 2002 submittal), several additional exceedances of the PM10 NAAQS have been experienced in the community. These exceedances were recorded at the Adams State site only; none have been seen at the recently sited PM10 monitor at the Municipal Complex. Details are included in the table below and documentation for these events is on file with EPA.

Table 1. Recent 24 Hour PM-10 Values in Alamosa Colorado

EVENT DATE	PM-10 Concentration	DETAILS
3/31/99	263 ug/m ³	Natural Event- EPA concurrence on July 3, 2001
4/9/99	190 ug/m ³	Natural Event- EPA concurrence on July 3, 2001
4/18/00	238 ug/m ³	Natural Event- EPA concurrence on July 3, 2001
12/17/00	217 ug/m ³	Natural Event- EPA concurrence on July 3, 2001
2/8/02	215 ug/m ³	Natural Event Under EPA consideration
2/25/02	182 ug/m ³	Natural Event Under EPA consideration
3/23/02	164 ug/m ³	Natural Event Under EPA consideration
5/21/02	160 ug/m ³	Natural Event Under EPA consideration

Taken together, the supporting documentation establishes a clear, casual relationship between the measured exceedances and the natural events as required by the NEP. On the days of Alamosa's PM10 exceedances, unusually high winds and/or wind gusts were experienced over a prolonged period of time. For example, meteorological data in and around the area (Trinidad, Colorado) demonstrate that on April 18, 2000, maximum wind speeds were over 41 miles per hour and gust speeds were as high as nearly 59 miles per hour. Meterological data for the December 18, 2000 event indicate that gusts were as high as 49 miles per hour in the Alamosa area. Both events were coupled with dry periods of weather.

According to the Natural Events Policy, "the conditions that create high wind events vary from area to area with soil type, precipitation and the speed of wind gusts." Thus, states are to determine the conditions that define high winds in an area. Making a precise determination, however, is a complex task that requires detailed information on soil moisture, daily wind speeds, temperature, and a number of other variables that are not readily available at this time.

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Until such research and/or guidance is available, the Division will use the definition of high winds included in the *Guideline on the Identification and Use of Air Quality Data Affected by Exceptional Events* for the Alamosa area. According to this guidance, high winds are defined as: “An hourly wind speed of greater than or equal to 30 mph or gusts equal to or greater than 40 mph, with no precipitation or only a trace of precipitation.” In all these high wind events, hourly wind speeds and/or wind gust data coupled with low precipitation levels meet this high wind definition.

The analysis and documentation of the natural high wind events fulfill Element 1 as described on page 3 of this NEAP.

B. Element 2: Public Education Programs

The purpose of this program is to inform and educate the public about the problem. The Division has worked with the City of Alamosa, Alamosa County Commissioners, and interested stakeholders to educate the public about the problems associated with elevated levels of PM10 in the Alamosa area. Several meetings have taken place with the City and County governments to discuss these issues and to develop a plan to address future high wind events in Alamosa. Elements of the public education program include: informing the public when air quality in the area is unhealthy; explaining what the public can expect when high wind events occur; what steps will be taken to control dust emissions during future high wind events; and, how to minimize the public’s exposure to high concentrations of PM10 during high wind conditions. The public notification and education programs will include but are not limited to:

- An informational and health-related brochure has been and will continue to be distributed by the local governments, the Alamosa County Health Nurses, and Alamosa County conservation and agricultural extension agencies to sensitive populations (elderly and local school districts) as well as the general public. Distribution of the *Blowing Dust Health Advisory Brochure* began in March 2000. A copy of this brochure is available in the Appendix. More recent (since the February 2002 submittal of the NEAP) activities include: 1) the revision of the area brochure to highlight additional activities in the community and make the document more reader friendly; 2) a review of the effectiveness of the brochure distribution in the community. The brochure is now available at additional sites in the community (e.g., County Land Use office), and; 3) the development of a Spanish version of the brochure.
- Beginning in February 2002, blowing dust watches and health advisories are being issued by the Alamosa County Public Health Nursing office during the high wind season (see Appendix for details). More recent (since the February 2002 submittal of the NEAP) activities include: 1) expanding the public education effort to include staff from the

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County Land Use office; 2) meetings with city, county, and local public health nurse to devise improved ways to educate/reach the community regarding blowing dust and its impacts.

- Media press releases for both the print and local radio will be issued in the community as needed. More recent (since the February 2002 submittal of the NEAP) activities include: 1) newspaper articles highlighting the significant impacts of the drought on blowing dust in the Alamosa area (e.g., “Biblical Level Help Needed for Drought,” *The Denver Post*, April 22, 2002. This referenced article also highlighted some of the mitigation strategies underway to limit impacts), and; 2) identifying possible Public Service Announcement outlets for additional outreach into the community and the ongoing development of an area press release on the NEAP development and control strategies.
- Meetings have been held to review the requirements of and local involvement in the NEAP. Other meetings will be convened as deemed necessary by State and/or local agencies.
- Advertising at local meetings (e.g. Sunshine Festival - Summer 2003) of ongoing efforts to reduce blowing dust and its impacts. This is new effort not part of the February 2002 submittal.
- Development of a logo/brand to better familiarize area residents to the NEAP and components of that plan including the blowing dust advisory. An example of that logo can be found on the revised *Blowing Dust Health Advisory Brochure*, located in the Appendix. This is new effort not part of the February 2002 submittal.
- Ongoing development of educational materials to be made available through the County’s tax announcement (2004). These educational materials will be distributed in the mail alongside tax announcements and are expected to go to all area residents (approximately 13,000 notices). Materials are likely to be in both English and Spanish. This is new effort not part of the February 2002 submittal.
- The Division in conjunction with the area County Public Health Nurse is revising the blowing dust education/notification procedure to highlight public health issues associated with blowing dust.
- Finally, County building inspectors will also educate citizens (home owners and contractors) about blowing dust issues and strategies to minimize such. This will be done in all construction zones in the county and documented as an item on the inspector’s checklist of building issues covered during the permitting process. This is new effort not part of the February 2002 submittal.

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This section fulfills the requirement of Element 2 as described on page 4.

C. Element 3: Public Notification Program and Health Advisory Program

The Blowing Dust Health Advisory program will notify the public that a high wind/blowing dust event is imminent or currently taking place, and will include an advisory suggesting what actions can be taken to minimize PM10 emissions and exposure to high concentrations of particulate matter.

Advisories are issued by the Alamosa area Public Health Nursing office, with forecasting assistance provided by the National Weather Service (Pueblo) and the Colorado Air Pollution Control Division. Since 2002, five (5) advisories have been issued locally. The forecasting methodology, the public education brochure, and a copy of the text of blowing dust forecasts and health advisories are provided in the Appendix.

Alamosa County will be investigating, during 2003, the possibility of modifying the 911 data base for reverse notification of sensitive populations during high wind events. This is new activity not included in the February 2002 submittal.

Finally, high winds are currently being documented to determine if the Division and the local agencies can better address these issues. For example, the Alamosa County Public Health Nursing office maintains records of all blowing wind events and the associated notifications. Included in this analysis is a rudimentary review of the high wind data to identify patterns of events and possible solutions to minimize public exposure. Given the drought conditions affecting the Alamosa area over the past several years, no consistent pattern (outside of extremely dry conditions and lack of rainfall) has been noted. Nonetheless, the Division is committed to continually investigating this issue and improving the advisory as possible. Ongoing review of those records will continue to investigate patterns of the exceedances and the notifications. This is a new activity that was not part of the February 2002 submittal and demonstrates additional efforts by the Division and the local agencies to minimize blowing dust and protect public health.

This section fulfills the requirement of Element 3 as described on page 4.

D. Element 4: Determination and Implementation of BACM

1. BACM Determination

According to the NEP, Best Available Control Measures (BACM) must be implemented for anthropogenic sources contributing to NAAQS exceedances in attainment and unclassifiable areas, like Alamosa. BACM must be in place for those contributing sources within *three years* after the first NAAQS violation attributed to high wind event(s) for sources in the Alamosa area. BACM must be in place no later than April 18, 2003. BACM for PM10 are defined (in 59 F.R. 42010, August 16, 1994) as techniques that achieve the maximum degree of emissions reduction from a source as determined on a case-by-case basis considering technological and economic feasibility.

On September 2, 1999 the Division attended several meetings in Alamosa with officials representing the City of Alamosa and Alamosa County Commissioners. Discussed were the monitoring data, meteorological data, potential contributing sources to the high wind events, the development of a NEAP, and possible control measures. In addition, meetings in December 2001 and February 2002 and numerous correspondences at other times have covered the same. The meetings, coupled with the analyses of the supporting documentation, identified two distinct sets of circumstances that lead to Alamosa's high wind/blowing dust exceedances of the PM10 NAAQS:

1. High concentrations of PM10 caused by a mixture of anthropogenic and non-anthropogenic sources coming largely from outside the area under high wind conditions; and,
2. Prolonged climatic conditions of low precipitation over an extended period of time that act to dry area soils, making them more susceptible to airborne activity under high wind conditions.

Discussions with the community stakeholders also covered local agricultural practices. Alamosa County is a predominately agricultural area where a lack of water, coupled with the frequent high winds experienced during late fall and early spring, can destroy crops, encourage pests, and damage soil surfaces lending them susceptible to wind erosion.

Other potential contributing sources may include construction sites, wind erosion of open areas, paved and unpaved roads, residential wood burning, and/or open burning. See below for more details on each of these potentially contributing sources and their consideration for BACM.

2. **BACM Options Considered**

Based on the contributing source analysis and/or in review with community stakeholders, the following BACM options were considered as possible PM10 control measures for the community:

- a) Street Sweeping Activities- community street sweeping programs have demonstrated effectiveness in other communities. Such activities were considered as a local control measure. Expanding the current street sweeping program was also reviewed.
- b) Construction/Demolition Activity – local ordinances to control emissions from construction and demolition sites have been implemented in other parts of the state with good success.
- c) Wind Erosion of Open Areas – several practices were reviewed regarding the wind erosion of open areas, including both local and regional efforts.
- d) Control of Stationary Source Emissions- as identified elsewhere in this NEAP, a review of stationary sources and their relative contribution to overall PM concentrations was completed. It was determined that six PM-10 sources exist in the area, appearing to contribute a small amount of particulate matter to the overall inventory.
- e) Road Stabilization- In a effort to better understand the effects of road stabilization, several options were reviewed including the use of chemical stabilizers and water as a stabilizing measure.

Also, periodic assessments to determine if traffic levels on unpaved roads surpass Colorado Regulation No. 1 limits were considered. If daily traffic counts exceed 200 trips per day on unpaved roads, state regulations apply that reduce PM-10 emissions from those roads. Specifically, periodic assessments of traffic levels on unpaved roads within the city limits and within one mile of the city limits were considered. State regulation calls for a road traffic count and dust control plan for roads that exceed the 200 trips threshold.

In addition, Alamosa currently suggests that drivers maintain their vehicles at a slow speed on unpaved roads and other dirt surfaces to reduce dust emissions.

- f) Woodburning Curtailment Programs- the possibility of instituting a citywide curtailment program was reviewed and considered. This consideration includes discouraging wood burning on high wind days.
- g) Open Burning- The usefulness of imposing and maintaining an open burning curtailment program during high wind events was reviewed. Current state air pollution control laws and

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regulations provide some guidance on the effort.

h) Avoidance of Dust Producing Equipment- The effectiveness of avoiding the use of dust producing equipment has also been considered. Currently Alamosa discourages the use of dust-producing equipment (e.g., leaf blowers) in an effort to reduce PM10 emissions and does so through public education and outreach efforts.

(i) Reducing or Postponing Tilling and Plowing or Other Agricultural Practices that Contribute to PM10 Emissions- It is well recognized that dust-producing activities such as tilling, plowing, and other agricultural practices increase the amount of PM10 released. As such, these control measures were discussed as part of the effort to reduce PM10 impacts on Alamosa. Review of existing and potentially future control practices were considered at the local, regional, state, and federal (e.g., Natural Resources Conservation Service) level.

j) Wind Break- Various trees are found throughout Alamosa. However, the placement of one row of barrier trees (e.g., Russian Olives) would block potential contributing sources. The Russian Olive is a quick growing large shrub/small tree will do well given the windy climate of Alamosa. According to section 3.5.2.1 of EPA guidance entitled Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, dated September 1992, one-row of trees is considered an effective windbreak.

k) Vegetative Cover/Sod- Efforts elsewhere in the State have demonstrated the usefulness of using a vegetative cover at sites where dust is known to blow. Efforts to use this control measure were reviewed for applicability and effectiveness.

Alamosa PM10 Stationary Source Emissions

To ensure that PM10 emissions from local stationary sources are not a significant contributing factor to area exceedances, an emission inventory was prepared and reviewed. Identified stationary sources are as follows: Public Service Company (natural gas/fuel oil plant), Rakhra Mushroom Farm Corporation (coal-fired boilers and one natural gas fired boiler), Rocky Mountain Soils (fugitive dust emissions), Rogers Family Mortuary (crematorium), San Luis Valley Regional Medical Center (biomedical waste incinerator), and Southwest Ready Mix (concrete batch plant). While no emission inventory of natural sources was prepared as part of this NEAP, appreciation for the significant sand dunes at Great Sand Dunes National Monument highlights that these few and limited stationary sources have very little effect on the total PM10 emission inventory for the Alamosa area. The following table demonstrates their limited impacts on the total emission estimation.

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Alamosa PM10 Emission Inventory (circa 2003)

Source	Emissions in lbs/day
Public Service Company of Colorado	44.4
Southwest Ready Mix	4.4
San Luis Valley Regional Medical Center	0.1
Rakhra Mushroom Farm Corp.	11.1
Rocky Mountain Soils, Inc.	11.5
Rogers Family Mortuary	0.5
TOTAL EMISSIONS	72.1

Limited Stationary Source Impacts

The largest of these stationary sources, Public Service Company of Alamosa (PSC), is 44.4 pounds per day of particulate matter (as reported to the Colorado APCD). At PSC, the site consists of two turbines that can run on natural gas, #1 fuel oil, #2 fuel oil, or a combination thereof. PSC must stay in compliance with Colorado Air Quality Regulation No. 1 particulate standard. PSC must also meet the state 20% opacity standard.

Other Alamosa area stationary sources have considerably smaller particulate matter emissions than PSC and their own existing control measures in place. For example:

Southwest Ready-Mix has a concrete batch plant in the City of Alamosa. Southwest Ready-Mix has several outside storage piles for their raw materials (sand & aggregate). There exists a sprinkler system at the facility to keep these piles watered. Cement and fly ash are stored in silos, each controlled with a baghouse to capture particulate when the silos are being loaded. When all of the raw materials are loaded into the concrete trucks, 25% of the total water is loaded first, followed by rock, sand, cement, and then the remaining water. This helps to minimize the particulate emissions from the truck during loading. The baghouses are part of the Southwest Ready-Mix permit, and as such are required. This source is also subject to the 20% opacity standard. Finally, Southwest Ready-Mix may be upgrading their baghouses.

San Luis Valley Regional Medical Center has a permit for a biomedical waste incinerator, which is natural gas fired. The incinerator is subject to New Source Performance Standards which limit opacity to 10% and also has a particulate standard. Ash removal from the incinerator must be done in an enclosed area to limit particulate emissions. Ash must be completely enclosed during transport as well.

3. BACM Options Discounted

Several BACM options were discounted from further consideration based on meteorological analysis, on-site inspections, and discussions with local government officials and sources.

Woodburning curtailment was discounted because high wind events are actually beneficial to good atmospheric clearing of particulate matter. In addition, woodburning curtailment was not recognized as an effective control measure on high wind days. Lastly, many of the community citizens rely on woodburning as their sole source of home heating- reducing or eliminating wood burning is thus not an option.

BACM of stationary sources at great distances from the City were discounted as their impacts would be negligible, if seen at all.

Finally, for this revised NEAP (since the February 2002 submittal), the community remains committed to meet BACM in all instances, as feasible. For example, meetings with local officials indicate that the ongoing regional drought may significantly impact the amount of water available as a control measure (e.g., watering of roads to reduce PM10). With that, water restrictions (and related economic impacts of the drought) will likely dictate the utility of this control measure.

4. BACM Implemented

Refer to the stakeholder agreements for details of selected BACM.

IV. STAKEHOLDER AGREEMENTS

The City of Alamosa, Alamosa County, the Division, and participating federal agencies have been working diligently to identify contributing sources and to develop appropriate BACM as required by the Natural Events Policy. A copy of relevant agreements and supplemental information are included in the Appendix. This section fulfills the requirements of Element 4 as described on page 4.

City of Alamosa

The City of Alamosa has been active in addressing potential PM10 sources within the Alamosa area through various efforts. Some of these efforts, plus other potential future measures, include the adoption of local ordinances to reduce PM10. Copies of current ordinances and any related commitments are included in the Appendix.

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Street Sweeping

Currently, the City of Alamosa sweeps on an every 6-week schedule or as needed, as determined by local officials on a case by case situation (e.g., following each snowstorm and/or where sand was applied). Sweeping occurs on every single City street with an emphasis on the downtown corridor where public exposure is expected to be greatest. In fact, street sweeping in the downtown corridor currently takes place three times per week.

In addition, the City recently agreed to lease/own a new TYMCO 600 (brush-assisted head) sweeper. Efforts are underway to get this effective piece of equipment into place immediately. This new sweeper will complement a mobile mechanical sweeper already in use.

Unpaved Roads within the City

While very few unpaved roads exist in the City of Alamosa, the city did recently annex new land. This annexation includes roadways not currently paved. The City of Alamosa is discussing the paving of these annexed roads. At a minimum, the City of Alamosa commits to continually provide in-kind engineering services for the development of the annexed lands.

Sod/Vegetative Cover Projects in the City of Alamosa

The development and construction of a local park, Eastside Park, is underway in Alamosa. It is anticipated that sodding at the park will take place this year. This commitment is anticipated to reduce blowing dust from this previously undeveloped site.

Alamosa County

Alamosa County has also been active in addressing blowing dust and is preparing county ordinance as such. Examples can be found below and available supporting documents in the Appendix.

Unpaved Roads

Alamosa County is presently addressing unpaved roads and lanes that are anticipated to contribute to PM10 emissions in the community. As of 2002, Alamosa County was nearing the end of its five-year road paving plan and was developing their next plan with the intention of paving on a yearly basis, based on traffic and community needs/priorities.

In 2002, Alamosa County addressed approximately ten (10) miles of unpaved roads. This includes the stabilization of approximately five section roads, the seal coating of two roads, and the overlay (repaving) of four (4) additional roads.

For 2003, approximately 14 miles of roads are scheduled for paving. This includes the Seven Mile Road (three miles long), Road 109 (one mile long), and 10th Street (also one mile long). These roads are in close proximity to the City of Alamosa, are upwind (prevailing) from the city,

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and have heavy traffic. Paving is anticipated to greatly reduce blowing dust and impacts in the vicinity.

In addition, once it gets cold enough in the area, the County will wet down some of the more sandy roads. Once the water soaks in and freezes, it is anticipated that good dust suppression will be seen. These commitments are anticipated to reduce PM10 emissions in and near Alamosa. This control measure will be balanced with the availability of water in the area.

Finally, Alamosa County assesses the need to use $MgCl_2$ treatment on roads in front of residences that request such service. Assessments include the sensitivity to dust of residents, the materials of the road base for safety reasons, and possible environmental concerns of the neighborhood. Most requests for treatment are granted. Road construction areas are being dampened with water for dust control. Other areas for treatment, such as commercial construction zones or gravel pits, are investigated on a case by case basis.

Dust Control Plans

Alamosa County is considering changes in local ordinances governing dust control plans at construction sites. This will be addressed through the revision of Alamosa County's Comprehensive Plan and supporting zoning codes. Alamosa County is currently reviewing language from other successful dust control programs for inclusion in their local ordinances. The process is due for completion in December 2003 or early 2004 and will specifically include dust control language. This effort is anticipated to reduce PM10 emissions in Alamosa, especially as it relates to impacts on the community and high recorded PM10 values. The Division commits to providing copies of this language to EPA upon finalization and availability.

Wind Erosion of Open Areas

To reduce PM10 emissions from open areas outside of the City limits, low tilling and other soil conservation practices will continue to be utilized in the community. In addition, the community is using in strategic areas the State of Colorado Agricultural Office's program to purchase and plant shelter trees to reduce wind erosion in open areas. These trees have a demonstrated advantage for the community and for air quality. Once the trees reach maturity, it is anticipated that the equivalent of 112 miles of double-rowed trees will be in place.

In addition, there is ongoing planting of trees (approximately 50) on newly developed Alamosa County property south/southwest of Alamosa (prevailing winds from southwest) and the Airport south of Alamosa for added air quality improvement.

These commitments are anticipated to further reduce the PM-10 emissions in Alamosa.

Sod and Vegetative Projects in the County

Numerous projects to reduce blowing dust and its impacts have happened or are happening at the

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County Airport. For example:

- Through additional grounds maintenance of the 40-acre Alamosa County airport south of the city, grass is being grown for aesthetics and dust control.
- Sodding and the placement of decorative rock and ground cover will be implemented in the landscaping of the Alamosa County property, as well. These measures will directly abate blowing dust at the Airport.
- Also, the widening of the airport's safety areas (250 feet on either side of the runway) is now complete and seeding of natural grasses was incorporated in the project. Trees and grass were incorporated in the approaches to the airport and have provided additional wind-break advantages to South Alamosa.

In other areas where watering is a problem, xeriscape (the use of native drought resistant vegetation and/or rock cover) is being encouraged for County owned property and for all other property owners.

These efforts are anticipated to further reduce PM10 emissions in Alamosa.

Open Burning Issues at the County

The Colorado air pollution control laws and regulations prohibit open burning throughout the state unless a permit has been obtained from the appropriate air pollution control authority. In granting or denying any such permit, the authority will base its action on the potential contribution to air pollution in the area, climatic conditions on the day or days of such burning, and the authority's satisfaction that there is no practical alternate method for the disposal of the material to be burned. No open burning is allowed when local wind speeds exceed 5 miles per hour.

Colorado State University Co-Op Extension Office

In response to extremely dry conditions, the need to maintain area topsoil, and reduce impacts, the Colorado State University Co-Op Extension Office of Alamosa County provides the following outreach efforts and recommendations:

- Modification of grazing practices to improve protective crop cover
- Increasing crop residues left in the fields to reduce blowing dust
- Planting of Fall crops to maintain fields
- Application of manure to protect top soils from blowing away
- Staggering of the harvest to minimize blowing dust
- Outreach programs on soil conservation efforts

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- Development of outreach/education materials (e.g., news articles, newsletters, fact sheets, etc.), and
- Attendance at Statewide workshop to educate other Co-Op offices to various practices to reduce blowing top soil and minimize impacts

These control strategies are not meant to be enforceable. They are meant only to demonstrate the regional nature of cooperation in addressing blowing dust and its impacts on the community.

Natural Resources Conservation Service

As stated elsewhere in this NEAP, Alamosa County is a predominately agricultural area where limited water, coupled with the frequent high winds experienced during late fall and early spring, can destroy crops, encourage pests, and damage soil surfaces lending them susceptible to wind erosion. Thus, activities that improve the topsoil and prevent its lifting during high wind events are encouraged. Some notable NRCS and agricultural examples include:

- Cover crops and perennial crops (e.g., alfalfa) are recommended to protect soils;
- NRCS works with area farmers in the development of conservation compliance plans to also protect topsoil;
- NRCS encourages the use of perennial crops or the leaving in place of weeds on the corners of area acreage (instead of tilling that might lead to open, barren lands) to reduce the lifting of topsoil;
- NRCS “cost shares” on conservation practices with local farmers to prevent soil erosion, and;
- The NRCS works with Colorado State University to identify other strategies that minimize blowing dust.

Other successful agricultural practices encouraged in the area include: timing of tillage, crop rotation, amount of crop residue left on the land, and proper water usage.

These control strategies are not meant to be enforceable. They are meant only to demonstrate the regional nature of cooperation in addressing blowing dust and its impacts on the community.

Natural Events Policy guidance indicates that control options must be implemented within three years of the exceedance in question. For Alamosa, BACM must be in place no later than April 18, 2003. This submittal is meant to meet that three year commitment.

This section fulfills the requirement of Element 4.

V. PUBLIC REVIEW AND PERIODIC EVALUATION

This section describes the public process used to develop this NEAP and the commitment made to periodically evaluate the plan.

Stakeholder Involvement

The EPA's NEAP development guidance states that the NEAP should be developed by the State in conjunction with the stakeholders affected by the Plan. The Colorado APCD worked with stakeholders mentioned throughout this document. Numerous meetings and telephone conversations occurred with stakeholders, and the final agreement here reflects control measures offered as part of the NEAP.

Public Review

The Division made this documentation available for and presented the NEAP and its strategies to the public to ensure public review and comment. Examples of these efforts in Alamosa, beginning with the earliest community involvement, include:

- Briefing of the San Luis Valley County Commissioners, "Air Quality Briefing," San Luis Valley County Commissioners' Association Meeting, September 1999.
- "Control Alamosa's Dust? Lots of Luck." Newspaper article appearing in *Pueblo Chieftan* indicating the area is developing a plan (NEAP) to address blowing dust – November 1, 2001.
- Briefing of the Alamosa City Council, "Alamosa Air Quality and the Development of a Local Natural Events Action Plan," a meeting to reintroduce the NEAP to City Council staff, February 6, 2002.
- Placement of *Natural Events Action Plan for Alamosa, Colorado* at the area library (Southern Peaks Public Library) for public review, February 2002.
- "Odd Issues Keep Alamosa Busy." Newspaper article appearing in *Valley Courier* indicating NEAP being developed and available for public review at the Southern Peaks Public Library, February 2002.
- Briefing of the Alamosa City Council, "Alamosa Natural Events Action Plan," a meeting to incorporate comments from the City Council, local stakeholders, and the public, February 20, 2002.
- Briefing of the Colorado Air Quality Control Commission, "Natural Events Action Plan for Alamosa, Colorado," May 2002.
- Briefing of the Colorado Air Quality Control Commission, "Alamosa Natural Events Action Plan – Final Activities," January 2003.
- Public Notice, "Natural Events Action Plan for Alamosa, Colorado" Available for Public Review and Comment at the Public Library, April 2003.
- "Media Advisory" notifying public of upcoming Alamosa City Council meeting to

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discuss the NEAP, monthly city council meeting agenda published in the area newspaper, May 2003.

- “Media Advisory” notifying public of City Council meeting to discuss the NEAP, Channel Ten Cable Access Channel Public Service Announcement, May 2003.
- Briefing of the Alamosa City Council, “Final Alamosa Natural Events Action Plan,” May 2003.

Periodic Evaluation

EPA’s Natural Events Policy guidance requires the state to periodically reevaluate: 1) the conditions causing violations of the PM10 NAAQS in the area, 2) the status of implementation of the NEAP, and 3) the adequacy of the actions being implemented. The State will reevaluate the NEAP for Alamosa at a minimum of every 5 years and make appropriate changes to the plan accordingly.

Evaluation of the effectiveness of the NEAP included several key strategies to ensure protection of public health and a robust plan. Strategies included: review of Natural Events Policy in specific relation to the Alamosa community, review of the effectiveness/appropriateness of ongoing control strategies, consideration of new/additional control options, review of meteorological and climatological conditions leading to blowing dust, review of local and regional PM10 monitoring data, discussions with other States (e.g., South Dakota, Washington) and Federal (US EPA) personnel regarding NEAP updates and protocols, review of the established emission inventory and identification of any new emission sources, review of the blowing dust advisory protocol and notification records, public/stakeholder meetings and community outreach/education efforts, etc.

The Division commits to continually review the effectiveness of the Alamosa Natural Events Action Plan and improve the effort, where feasible.

The Division commits to evaluate the NEAP at a minimum of every five years.

Submittal to EPA

The NEAP was submitted in its initial form to EPA in October 2001. Following EPA comment and input from stakeholders, appropriate changes were made to the NEAP. The Alamosa City Council heard and approved the NEAP in February 2002. Since that period, meetings with local agencies and stakeholders have led to finalization of stakeholder agreements (found elsewhere in the NEAP). The *Final Natural Events Action Plan for Alamosa, Colorado* and its Best Available Control Measures, where feasible, are presented here as required under the Natural Events Policy¹.

This section fulfills the requirements of Elements 6, 7, 8, and 9 as described on page 4 and 5.

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1. Natural Events Policy (NEP). EPA, May 30, 1996.
 2. Soil Survey: Alamosa County Colorado. USDA, Soil Conservation Service. April 1966, p. 140.
 3. NEP. p. 8.
 4. Colorado State PM10 Natural Events Report: Technical Support Document. Colorado Department of Public Health and Environment, Air Pollution Control Division, Technical Services Program. October 6, 1996. p. 14.
 5. NEP. p. 9.
 6. NEP. p. 5.
 7. NEP. p. 5.