STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Air Pollution Control Division
9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243

June 12, 2003

Kay T. Prince, Chief of Air Planning Branch
US EPA, Region IV
Atlanta Federal Center, 12th Floor
61 Forsyth Street, SW
Atlanta, GA 30303

RE: Submittal of "Likely" Control Measures for Early Action Compact Areas

Dear Ms. Prince:

In accordance with the Early Action Compact (EAC) agreement, you will find enclosed the "likely" list of control measures for each of the EAC areas in Tennessee. This is being submitted on behalf of each EAC area to comply with the June 16, 2003 milestone. Each compact area has selected control measures for their county, which are being considered as a means to achieve the 8-hour ozone standard by 2007.

The following information is enclosed:

- Executive Summary
- EPA - Checklist of June 16, 2003, Control Measures List
- Table 1 - Summary of likely EAC Control Measures by county with chosen control measures
- Table 2 - List of Control Measures with ID assigned to interpret Table 1
- Table 3 - List of likely Statewide Control Measures being considered
- Tennessee Map - Showing 8 hour ozone design values by MSA for 2000-2002
- Copy of the April 14, 2003, Memorandum from Lydia N. Wegman
- Likely Control Measures List and the signatory pages for the Chattanooga area, Haywood County, Knoxville area, Memphis area, Nashville area, Putnam County and the Tri-Cities area. Lawrence County submitted a request to opt out of the EAC.

I believe this submittal satisfies all requirements of the June 16th EAC milestone, but if more information is needed do not hesitate to contact me.

Sincerely,

Barry R. Stephens, P.E.
Director
Division of Air Pollution Control

cc: Karen Borel & Dick Schutt, EPA, Region IV
Local Air Programs
Tennessee Air Pollution Control Board
EAC Signatories

EXECUTIVE SUMMARY

Enclosed please find the necessary documentation to the meet the Ozone Early Action Compact (EAC) deadline for submittal of Likely Control Measures for Tennessee due June 16, 2003. This documentation meets the guidance provided in the letter signed by Lydia N. Wegman sent to appropriate Regional Administrators and Air Directors dated April 4, 2003 (enclosed for reference). The following describes the remaining contents of this submittal.

1. First find the June 16, 2003, EPA Control Measures Checklist.

2. Table 1 is a summary of the Likely Control Measures (LCM) chosen from a prepared list and submitted by each EAC. The table is arranged first by EAC, then by county within each EAC. The fourth column lists the chosen control measures for each county by a numeric ID. This ID identifies each of the control measures listed in Table 2 described next.

3. Table 2 is a slight modification of a list of LCM originally prepared by Dr. Wayne Davis, University of Tennessee, Knoxville, and the Nashville / Davidson County Air Program. This list was sent to all EACs to serve as a starting point for discussions and deliberations, and was specially targeted toward the rural counties. This table provides a brief description of each control measure along with other important information to assist the deliberative process. Each control measure is assigned a unique ID, and it is this ID that is listed in column four of Table 1. Please note that in some cases a reference is made in column four of Table 1 to an attachment. This was necessary when the submitting entity significantly modified or customized the original LCM list, or added additional control measures. Each EAC was encouraged to submit additional control measures tailored to their specific needs. The attached lists are found along with other documentation for each EAC in the tabbed sections of this binder described below.

4. Table 3 summarizes the Control Measures being considered for statewide implementation in Tennessee. Please note that regulatory development is currently underway.

5. Next comes a map of Tennessee detailing the 8-hour 2000-2002 ozone design values and Metropolitan Statistical Areas (MSA and CMSA). Also included is the Lydia Wegman letter dated April 4, 2003 referenced above.

6. Finally, find a tabbed section for each EAC. These sections contain transmittal letters, signature pages, and the LCM lists, some of which may be referenced in column four of Table 1 as discussed above.

Review Checklist for June 16, 2003, Control Measures List

1. **Did the Early Action Compact area submit an identification and description of control measures being considered by the local area? YES**

2. **Was this list of controls submitted (postmarked or emailed) no later than June 16, 2003? YES**

3. **What date was the list of controls submitted?**
   Submitted to EPA June 12, 2003

4. **Who submitted the list of controls?**
   Barry R. Stephens, P.E.
   Director, Division of Air Pollution Control

5. **Does it appear that the control measures contained in the June 16 list of controls can be implemented in this specific EAC area? YES**

6. **Does it appear reasonable that the list of controls can be implemented within the time frame of the EAC, i.e., no later than 2005? YES**

Table 1
Tennessee Likely EAC Control Measure Summary Table

	EAC	TN County	Chosen Control Measures By ID
1.	Chattanooga	Hamilton	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
2.		Marion	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
3.		Meigs	3, 4, 6, 8, 9, 10, 11, 14, 16, 18, 19, 20, 21, 22, 23
4.	Haywood	Haywood	3, 14, 15, 16, 20, 23, 25, 26, & item 9 in attached list
5.	Knoxville	Anderson	Control Measures 1-27
6.		Blount	Control Measures 1-27
7.		Jefferson	3, 7, 8, 12, 14, 15, 19, 22, 23, 25, 26
8.		Knox	Control Measures 1-27
9.		Loudon	Control Measures 1-27
10.		Sevier	Control Measures 1-27
11.		Union	Control Measures 1-27
12.	Lawrence	Lawrence	Opting out
13.	Memphis	Fayette	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
14.		Shelby	See attached list of custom measures and descriptions for county
15.		Tipton	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
16.	Nashville	Cheatham	12, 16, 19, 25
17.		Davidson	See attached list of custom measures and descriptions for county
18.		Dickson	Control Measures 1-27
19.		Robertson	5, 8, 10, 14, 16, 17, 19, 25. See also items 5, 6 on attached list.
20.		Rutherford	See attached list of custom measures and descriptions for county
21.		Sumner	1, 2, 4, 5, 6, 9, 11, 14, 15, 16, 17, 19, 20, 22, 23, & see items 15, 16, 20 from county custom list. See also custom lists for Hendersonville, Millersville, White House
22.		Williamson	Control Measures 1-27
23.		Wilson	1, 2, 3, 5, 6, 7, 12, 13, 15, 16, 18, 20, 22, 26, & item 15 from attached list
24.	Putnam	Putnam	1, 5, 6, 10, 12, 14, 15, 16, 17, 25, 26, 27, & item 2 on attached list
25.	Tri-Cities	Carter	See attached custom list for entire EAC
26.		Hawkins	
27.		Johnson	
28.		Sullivan	
29.		Unicoi	
30.		Washington	

TABLE 2
LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC, CO	M	R	L and/or S
2	Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
3	Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
4	Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
5	Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
6	On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
7	On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
8	On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
9	On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

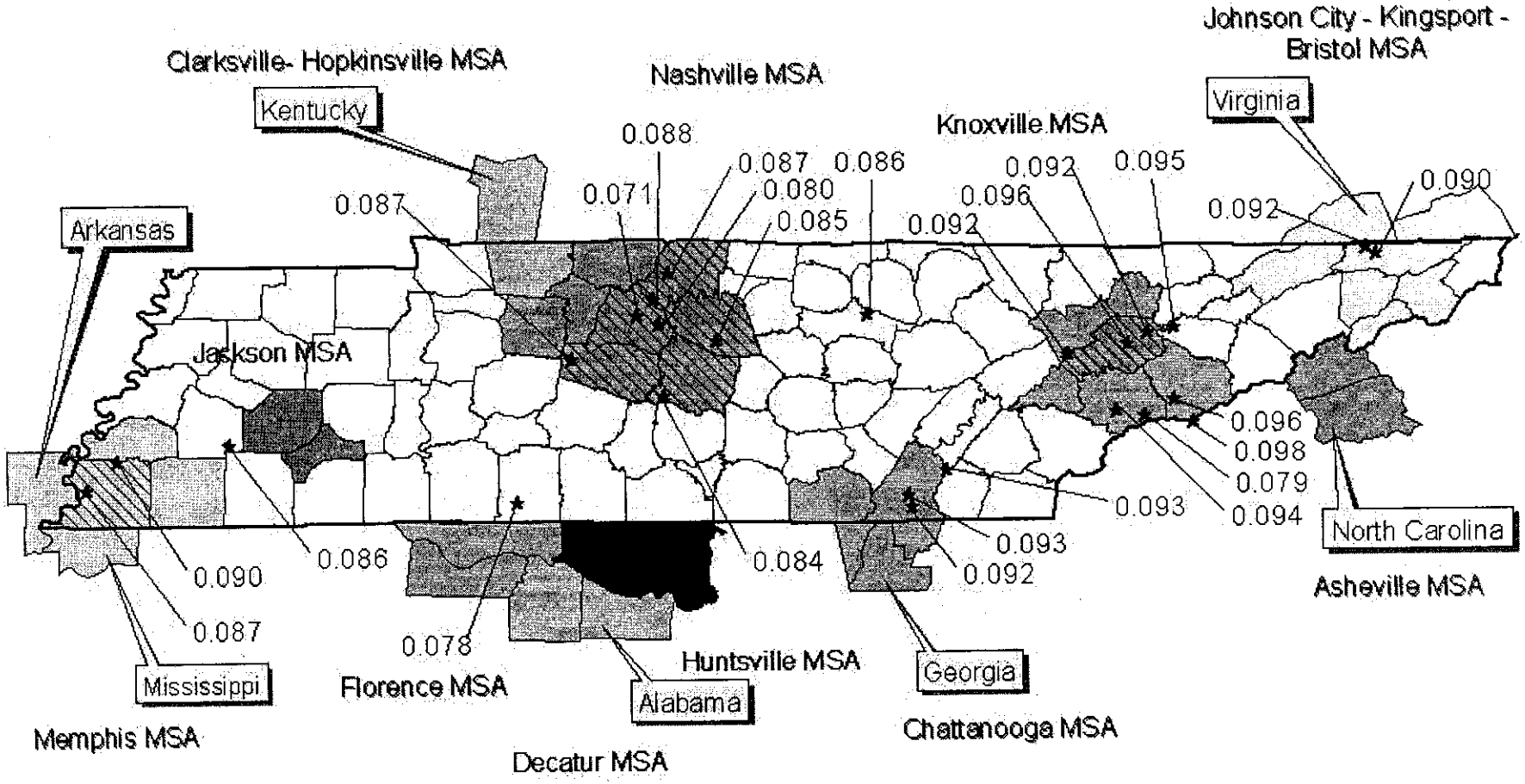
ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
11	Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
12	On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
13	On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
14	HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
15	All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
16	Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC,CO	S	R	L
17	On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
18	On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
19	On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
20	On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S
21	All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
22	All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
23	TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
24	Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
25	All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
26	All	Public education at community events	NOx, VOC, CO	C	V	L
27	All	Air quality web page/public information	NOx, VOC, CO	C	V	L
	OTHERS---					

TABLE 3
LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES BEING CONSIDERED FOR STATEWIDE IMPLEMENTATION (REGULATORY DEVELOPMENT UNDERWAY)

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile	Expanding scope of IM program to include heavier weight vehicles (up to 10,000 GVWR) in Middle Tennessee only	NOx, VOC, CO	M	R	S and/or L
5	Stationary & Mobile NOx sources	Drafting statewide NOx RACT Rule -The rule is for NOx generating sources and facilities. The target is 50 TPY. It will require a RACT determination or verification of non-applicability.	NOx	S & M	R	S and/or L
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	S and/or L
14	HDDV and buses	Drafting statewide Anti-idling rule	NOx, VOC, CO	M	R	S and/or L
20	On-road vehicles	Drafting smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	S and/or L
	Other					
	On-road vehicles	Drafting statewide vehicle Anti-tampering rule	NOx, VOC, CO	M	R	S and/or L

Tennessee 8 Hour Ozone
Design Values By MSA 2000 - 2002



Notes:
Design values in parts per million.
Old 1-hr nonattainment areas in hatched areas.
A county with a design value greater than or equal to 0.085 ppm is violating the standard.

★ **Monitoring Sites With an 8 Hr Ozone DV**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

APR 04 2003

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Early Action Compacts (EACs): The June 16, 2003 Submission and Other Clarifications

FROM: Lydia N. Wegman, Director
Air Quality Strategies and Standards Division

TO: Air Directors, Regions III, IV, VI, and VIII

This memorandum responds to questions from States and local EAC areas about what needs to be included in the milestone submittals and semiannual reports due June and December 2003. As we have stated before, completion of each of the critical milestones and schedules as described in the "Protocol for Early Action Compacts Designed to Achieve and Maintain the 8-hour Ozone Standard" ("Protocol"), revised November 2002, and the November 14, 2002 memorandum from Jeffrey Holmstead to EPA Regional Administrators is essential if areas are to remain eligible for participation in the EAC program. To ensure that the 2003 submissions and subsequent milestones will be met, we are issuing this memorandum (1) to provide State and local air pollution control agencies some general guidelines to assist them in completing the June 16, 2003 submission; (2) to clarify what should be included in the semiannual reports due in June and December 2003; and (3) to clarify several technical requirements of the program to ensure that the attainment demonstrations being developed in conjunction with the local air quality plans are representative of current information and conditions.

1. June 16, 2003 Submission

The Protocol and the November 14, 2002 Holmstead memorandum require EAC areas to identify and describe the local control measures that will be considered during the local planning process. This June 16, 2003 milestone must be met to maintain eligibility in the EAC program. This submission can be referenced in the June 2003 progress report, as described in the Section 2 of this memorandum.

We recommend that EAC areas, based on stakeholder consultation, submit by June 16, 2003 a list of candidate local control measures that is sufficient to ensure a control strategy can be developed to achieve attainment of the 8-hour ozone standard by 2007. As provided in the Protocol, areas should describe each of the local control measures under consideration.

As EAC areas prepare and subsequently analyze the June 2003 list of local measures, we advise the participants to work with stakeholders to consider carefully each of the following components needed to develop an attainment strategy:

- Local control measures that can reasonably be implemented in each area. Among the factors to consider are the resource and political constraints of that specific area;

- Realistic implementation dates for the control measures;

- The range of potential emissions reductions that will result from each control measure based on reasonably available information. (In accordance with the Protocol, these local measures must be specific, quantified, and permanent, and that if approved by EPA, will be federally enforceable SIP revisions.) A list of resources containing emissions reduction estimates for specific measures can be found in the attachment to this memorandum; and

- The geographic area to which control measures could be applied.

Any public comments received in response to the June 16, 2003 submissions will be posted on EPA's EAC website at: http://www.epa.gov/ttn/naaqs/ozone/eac/ .

2. June 30, 2003 Progress Report

The Protocol requires local areas to assess and report every 6 months their progress against milestones in a regular, public process. At a minimum, the June 2003 progress report should do the following:

- Document progress in developing the stakeholder process, including the roles and responsibilities of various stakeholder groups, a list of stakeholders, and a brief summary of stakeholder meetings;

- Report progress on evaluating and selecting emission reduction measures for the local control strategy, including stakeholder involvement in the development of the initial list of control measures (The June 2003 progress report can reference the June 16, 2003 submission discussed above.);

- Describe public outreach activities (press coverage, public presentations, websites, etc.); and

- Provide an update on modeling/technical planning activities.

3. December 31, 2003 Progress Report

As part of the December 2003 progress report, EAC areas should address in detail each of the bulleted components discussed in section 1 above. This progress report will be an important element in EPA's consideration of whether or not to grant a deferral of the effective date of the nonattainment designation at the time of final designations in April 2004. More specifically, the progress report should address:

- A list of control measures still under consideration for adoption by the local area as part of the March 2004 submission;
- Likely implementation dates for the local control measures that are under consideration;
- Current assessment of the amount of emissions reductions expected to be achieved through implementation of the local control measures; and
- The geographical area in which each control measure is anticipated to apply.

4. Attainment Demonstration

As State and local agencies move forward to develop the modeling and other technical analyses in support of attainment demonstrations for EAC areas, they have asked EPA for clarification of the modeling guidance and its application to EAC areas. As modeling demonstrations will become part of the enforceable SIP, State and local agencies should do the following:

- Follow the most recent OAQPS modeling guidance ("Draft Guidance on the Use of Models and Other Analyses in Attainment Demonstrations for the 8-hour Ozone NAAQS," May 1999, EPA-454/R-99-004); see: http://www.epa.gov/scram001/guidance/guide/drafto3.pdf ;
- Model most current emissions inventory, preferably 2002; however, if 2002 is not available, use of a 1999 or later inventory for EAC modeling is acceptable;
- Base 2007 projections on 1999 emissions inventory or later;
- Use MOBILE6 in both the current and future inventories;
- Select episodes that are representative of the area's ozone problem;
- Use appropriate assumptions and emissions analysis techniques in quantifying emissions reductions.

Please advise your States that any deviations from the above guidance need to be reviewed by and coordinated with the EPA Regional Office. For additional clarification of these and other technical requirements, State and local agencies should refer to questions and answers related to EAC modeling issues at: http://www.epa.gov/scram001/guidance/guide/eac-ozone.pdf . This document, which will be updated periodically with additional questions as necessary, provides clarification of the current modeling guidance and its application to EAC areas.

I hope this information will be helpful to you and EAC areas as they move forward to meet the swiftly-approaching milestone and semiannual reports for this year.

Any questions related to EAC policy issues should be directed to David Cole at 919/541-5565, while questions related to EAC modeling and attainment demonstration issues should be directed to Ellen Baldridge at 919/541-5684.

cc: Air Directors, Regions I, II, V, VII, IX, X
Margo Oge, OTAQ
Steve Page, OAQPS
Peter Tsirigotis, OAQPS
Joe Tikvart, OAQPS
G.T. Helms, OAQPS
Jan Tierney, OGC

ATTACHMENT

Resources for Identification of Control Strategies, Emission Reduction Estimates and Emission Inventories

URL	Downloadable Document(s) and Websites
www.epa.gov/otaq/transp/costemis.pdf	"Summary Review of Costs and Emission Reductions for 24 CMAQ Projects" (September 1999)
www.epa.gov/otaq/transp/publicat/pub_volu.htm	"Quantification of Episodic Control Programs" (EPA420-R-97-0061, April 1997)
http://www.epa.gov/oms/transp/comchoic/sipguide.pdf	"Index of Transportation Measure Quantification Efforts: Methodology Matrix" (EPA420-R-98-018, September 1998)
http://www.epa.gov/oms/transp/comchoic/sipguide.pdf	"State Implementation Plan Development Guidance: Using Emission Reductions from Commuter Choice Programs to Meet Clean Air Act Requirements" (EPA420-R-98-007, December 1998)
www.epa.gov/otaq/transp/publicat/pub_tcms.htm	"Benefit Estimates for selected TCM Programs" (EPA420-R-98-002, July 1999)
www.epa.gov/otaq/transp/publicat/pub_tech.htm	Transportation and Air Quality ACM Technical Overviews. These documents provide overviews of individual TCMs, discussing their advantages, disadvantages, and issues involved in their implementation. Topics: *Accelerated Retirement of Vehicles, Bicycle and Pedestrian Programs, Commute Alternative Incentives, Congestion Pricing, Guaranteed Ride Home, High Occupancy Vehicle Lanes, Intelligent Transportation Systems, Parking Management, Parking Pricing, Improved Public Transit, Telecommuting, Traffic Flow Improvements, Trip Reduction Ordinances, Work Schedule Changes*

www.epa.gov/otaq/transp/publicat/pub_mrkt.htm	"Opportunities to Improve Air Quality Through Transportation Pricing Programs" (EPA420-R-97-004, July 1997)
http://www.epa.gov/otaq/transp/publicat/pub_pedo.htm	"TDM Case Studies and Commuter Testimonials" (August, 1997) Successful transportation demand management programs are described in 19 case studies.
http://www.epa.gov/dced/pdf/comparing_methodologies.pdf	"Comparing Methodologies to Assess Transportation and Air Quality Impacts of Brownfields and Infill Development" (EPA-231-R-01-001, August 2001)
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Methodologies for Estimating Emission and Travel Activity Effects of TCMs" (EPA-420-R-94-002, July 1994)
http://www.epa.gov/ttn/chief/	Clearinghouse for Inventories and Emission Factors, including a new draft of an update to the 1999 National Emission Inventory (March 11, 2003)
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Meeting the 15-Percent Rate-of-Progress Requirement Under the Clean Air Act: A Menu of Options," STAPPA/ALAPCO, September 1993.
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Controlling Nitrogen Oxides Under the Clean Air Act: A Menu of Options," STAPPA/ALAPCO, July 1994.
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Serious and Severe Ozone Nonattainment Areas: Information on Emissions, Control Measures Adopted or Planned and Other Available Control Measures," November 24, 1999.
http://www.epa.gov/otaq/voluntary.htm	EPA Website: Transportation and Air Quality Voluntary Programs, including Green Vehicle Guide, Voluntary Diesel Retrofit Program, and Commuter Choice Leadership Initiative, U.S. EPA (updated January 10, 2003)

http://www.epa.gov/otaq/transp/traqdata.htm	EPA Website: Transportation and Air Quality Planning, Clearinghouse and Databases. Includes Survey of Episodic Control Programs, Market Incentives Resource Center for Air Quality Programs, Smart Travel Resource Center, Transportation-related Grants Database, and Transportation Control Measures Program Information Directory (updated June 28, 2002)
http://www.epa.gov/otaq/transp/landguid.htm	"Improving Air Quality Through Land Use Activities." Report (EPA420-R-01-001, January 2001)
http://www.epa.gov/otaq/transp/traqtcms.htm	EPA Website on Transportation Control Measures: On-line Database; Methodologies for Estimating Emission and Travel Activity Effects of TCMs - (EPA420-R-97-004, July 1997)
http://www.trb.org	Transportation Research Board Website: Quantifying Air-quality and Other Benefits and Costs of Transportation Control Measures

NASHVILLE EARLY ACTION COMPACT AREA

Cheatham
Davidson
Dickson
Robertson
Rutherford
Sumner
Williamson
Wilson

LIST OF LIKELY CONTROL MEASURES FOR

Cheatham County, Tennessee
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
William R. Orange	County Executive	5-29-03

Other signatories are as follows:

NAME	TITLE	DATE

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC, CO	M	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC,CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	C	V	L
All	Air quality web page/public information	NOx, VOC, CO	C	V	L
OTHERS---					

Metropolitan Government of Nashville and Davidson County

Bill Purcell Mayor

June 3, 2003

Commissioner Betsy Child
Tennessee Department of Environment and Conservation
401 Church Street, 21st Floor
Nashville, Tennessee 37243

Dear Commissioner Child:

Enclosed is Davidson County's submittal to comply with the Early Action Compact June 16, 2003, milestone. The "List of Davidson County 'Likely' EAC Control Options," provided by the Metropolitan Department of Health, is based upon the best information available to the Department as of June 1, 2003.

Sincerely,

Bill Purcell
Mayor

BP/dt

Enclosure

cc: Mr. Barry Stephens
Division of Air Pollution Control

Office of the Mayor
Metropolitan Courthouse
Nashville, Tennessee 37201
Phone: 615.862.6000
Fax: 615.862.6040
mayor@metro.nashville.org

LIST OF DAVIDSON COUNTY "Likely" EAC CONTROL OPTIONS BASED ON INFORMATION AVAILABLE 6-1-03

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
Stationary NOx sources	NOx RACT for sources not covered by the Federal NOx SIP call--Apply low NOx combustion controls to sources such as large internal combustion engines, boilers and other fuel burning equipment	NOx	S	N	R	L and/or S (TDEC)
Open burning	Revise open burning regulations to prohibit residential burning of leaves and yard clippings and restrict the use of air curtain destructors on air quality action days	NOx, PM, VOC,CO	S	E	R	L and/or S (TDEC)
LDGV, HDGV	Modify basic vehicle inspection program to include up to 10,000 lb. vehicles, tighten standards for 6,000 - 8,000 lb. vehicles	NOx, PM VOC,CO	M-gasoline	E	R	L and/or S (TDEC)
On-road vehicles	Expand HOV network and increase efficiency of existing HOV lane network	NOx, PM VOC,CO	M-gasoline	O	V	L and/or S (TDOT)
On-road vehicles	Trip reduction plan for large employers including Metro and State	NOx, PM, VOC,CO	M-gasoline	O	V	L
On-road vehicles	Area wide rideshare incentives	NOx, PM VOC,CO	M-gasoline	E	V	L
On-road vehicles	Intelligent transportation system such as traffic signal synchronization and roadside assistance/incidence management program	NOx, PM VOC,CO	M-gasoline and diesel	O	V	L and/or S (TDOT)
On-road vehicles	Additional greenways and bike paths	NOx, PM, VOC,CO	M-gasoline	O	V	L

LIST OF DAVIDSON COUNTY "LIKELY" EAC CONTROL OPTIONS (continued)

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
On-road HDDV, buses and fleet vehicles	Encourage accelerated replacement with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	V	L and/or S (TDEC/TDOT)
HDDV including buses	Truck stop electrification/Anti-idling regulation	NOx, PM, VOC,CO	M-diesel	N	V/R	L and/or S (TDEC)
Transit buses	Reduced fare on AQAD	NOx, PM, VOC,CO	M-gasoline	N	V	L
Transit Vehicles	Improve transit service including bus rapid transit and rail where feasible	NOx, PM, VOC,CO	M-gasoline and diesel	N	V	L
Off Road Vehicles and Equipment	Encourage accelerated replacement with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	V	L and/or S (TDEC/TDOT)
On and Off Road Diesel Vehicles	Encourage the use of fuel additive to increase Cetane number of diesel fuel	NOx	M-diesel	N	V	L and/or S (TDEC/TDOT)
Off Road Vehicles and Equipment	On State and Metro construction jobs, give preference to bidders using equipment that has been replaced with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	R	L and/or S (TDOT)
Airport service equipment and vehicles	Low NOx technologies	NOx	C	N	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, PM, VOC,CO	C	N	V	L and/or S (TDEC/TDOT)
Land use	Land use policies designed to reduce VMT growth	NOx, PM, VOC,CO	C	N	V/R	L

LIST OF LIKELY CONTROL MEASURES FOR

2003 JUN 11 AM 9:39

Dickson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Linda J. Frazier	County Exec.	6-9-03

Other signatories are as follows:

NAME	TITLE	DATE

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC, CO	M	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC,CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	C	V	L
All	Air quality web page/public information	NOx, VOC, CO	C	V	L
OTHERS---					

Robertson County Tennessee
HOWARD R. BRADLEY
County Executive
108 County Courthouse
SPRINGFIELD, TENNESSEE 37172
(615) 384-2476
FAX (615) 384-0617

RECEIVED
JUN 0 9 2003

May 3, 2003

Mr. Barry R. Stephens
Department of Environment and Conservation
Division of Air Pollution Control
401 Church Street, L & C Annex, 9th Floor
Nashville, TN 37243-1531

Dear Mr. Stephens:

Robertson County is submitting the following list of Likely Control Measures as required by the counties participation in the ozone Early Action Compact with the State of Tennessee and Environmental Protection Agency.

This list is of likely control measures that may be adopted for Robertson County when the decision is made in December on the actual control measures that will be adopted. The County will work with you and your office in the planning and adoption of the required measures.

If you have any questions regarding our list, please do not hesitate to contact me at 384-2476.

Respectfully,

Howard R Bradley

Howard Bradley
County Executive

Enclosure

xc. Members of the Robertson County Commission

Proposed Air Quality Control Measures

These recommendations are actions that can be supported by Robertson County and possibly implemented by the county. This list is preliminary and additional measures may be added in the future after further study and receiving input from out the county.

1. Support Federal Initiates to add controls on Electrical Utility and Industrial sources.

2. Support and study ride share incentive programs due to a high commuter traffic rate from Robertson County.

3. Support the construction of High Occupancy Vehicle (HOV) lanes and the location of Commuter Park and ride lots. County can act as the coordination agency in the location and development of these lots.

4. Support requirement of the diesel fuel additive (cetane) in all vehicles.

5. Support land use decisions for the city, County and state that promotes pedestrian accessibility and discourages decisions that encourage urban sprawl.

6. Support the development of pedestrian and bicycle greenways (Such as the current ones in Springfield and White House).

7. Support the reducing the Speed Limit (from 70 to 55) for Trucks only on rural interstates.

8. Support a ban on open burning on ozone action days.

9. Support development in the education system a program to educate future drives on the impacts of vehicles on the environment.

10. Support truck stop electrification to reduce idling of heavy-duty vehicles.

11. Support, study and explore possible funding sources to replace older County diesel vehicles with more efficient and cleaner burning vehicles.

LIST OF LIKELY CONTROL MEASURES FOR

RUTHERFORD
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Nancy R. Allen	COUNTY EXECUTIVE	5-29-03

Other signatories are as follows:

NAME	TITLE	DATE
Tommy Bragg	Mayor, City of M'boro	6-4-03

LIST OF LIKELY CONTROL MEASURES FOR

RUTHERFORD
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Nancy R. Allen	COUNTY EXECUTIVE	5-29-03

Other signatories are as follows:

NAME	TITLE	DATE
Nolan T. Barham, Jr.	Mayor, Caryville TN	6-5-2003

LIST OF LIKELY CONTROL MEASURES FOR

RUTHERFORD
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Nancy R. Allen	COUNTY EXECUTIVE	5-29-03

Other signatories are as follows:

NAME	TITLE	DATE
Mike Webb	MAYOR	6/4/03

LIST OF LIKELY CONTROL MEASURES FOR

RUTHERFORD
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Nancy R. Allen	COUNTY EXECUTIVE	5-29-03

Other signatories are as follows:

NAME	TITLE	DATE
M L Jones	Town Manager	6/5/03

PROPOSED LIST OF RUTHERFORD COUNTY EAC REDUCTIONS

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
LDGV, HDGV	Expand basic vehicle inspection program EAC-wide and modify to include up to 10,000 lb. Vehicles, tighten standards for 6,000-8,000 lb. Vehicles and include OBDII	NOx,VOC, CO	M-gasoline	E	R	L and/or S (TDEC)
On-road vehicles	Expand HOV network and increase efficiency of existing HOV lane network	Nox, VOC, CO	M-gasoline	O	V	L and/or S (TDOT)
On-road vehicles	Intelligent transportation system such as traffic signal synchronization and roadside assistance/incidence management program	Nox, VOC, CO	M-gasoline and diesel	O	O	L and/or S (TDOT)
On-road vehicles	Additional greenways and bike paths	Nox, VOC, CO	M-gasoline and diesel	O	V	L
On-road vehicles	Support state speed limit on interstates perhaps only when ozone action day called	Nox	M-gasoline and diesel	N	V/R	S (TDOT)
Transit buses	Support reduced fare on AQAD	Nox, VOC, CO	M-diesel	N	V	L
Transit vehicles	Investigate implementation of transit service including bus rapid transit and rail where feasible	Nox, VOC, CO	M-gasoline and diesel	N	V	L
Off road vehicles and	On state and local construction jobs, give favorable consideration	Nox, VOC, CO	M-diesel	N	R	L and/or S (TDOT)

equipment	to bidders using equipment that has been replaced with newer lower emitting vehicles, vehicles using cleaner fuels or using add on vehicles					
Airport service equipment and vehicles	Support low Nox technologies	Nox	C	N	V/R	L
All gasoline vehicles	Support lower gasoline RVP during ozone season	VOC	C	E	R	S (TDEC)
All categories	Air quality action day (AQAD)	Nox, VOC, CO	C	N	V	L and/or S TDEC/TDOT
Land use	Land use policies designed to reduce VMT growth	Nox, VOC, CO	C	N	V/R	L

R.J. "HANK" THOMPSON
SUMNER COUNTY EXECUTIVE

June 3, 2003

Jeanne Stevens
Nashville Area MPO Coordinator
730 Second Avenue South
Nashville, TN 37201

Dear Mrs. Stevens:

The enclosed information is in relation to the Early Action Compact efforts in Sumner County. I have included the information for the cities within Sumner County, which has been forwarded to this office. I believe the cities of Gallatin and Hendersonville have forwarded their own lists, independent of this information.

Sumner County has engaged in considerable dialogue, within various meeting formats, regarding the Early Action Compact. I feel that we have a good sense of the urgency associated with this very important initiative and I am confident Sumner County will do its part to meet the adopted goals.

There are a number of common measures set forth in the enclosures, as well as some that are unique to a given municipality or the county. It is my understanding that these are only suggestions for likely control measures, and are not considered binding at this time. It is also my understanding that we will have the opportunity to update and/or change these as we progress toward the deadline of March 31, 2004 for adoption of the Air Quality Improvement Plan.

Thank you for your assistance and guidance. If you have any questions regarding this matter, please feel free to call my office at 452-3604, or Mike Moulton at 442-1183.

Sincerely,

R. J. "Hank" Thompson
Sumner County Executive

Encl.

355 NORTH BELVEDERE DRIVE • ROOM 102 • GALLATIN, TENNESSEE 37066-5413 • (615) 452-3604 • FAX (615) 451-6066

Sumner County
Preliminary List of Air Quality Control Measures
June 2003

1. Sumner County Resource Authority retro-fit
2. Support initiatives to add controls on Electrical Utility Sources (i.e. Gallatin plant)
3. Support initiatives to add control on Industrial Sources (i.e. gas lines)
4. Support initiative to apply Stage 1 automotive I/M program to all MSA counties
5. Encourage a funded gas cap replacement program
6. Support lowering Truck speed limits on interstates
7. Support initiative for Truck Stop Electrification/anti-idling regulation
8. Encourage accelerated replacement of Diesel powered On-road HDDV and Buses
9. Encourage and or implement use of low sulfur fuels
10. Implement use of Bio-Diesel with appropriate additives
11. Support expanding I/M program to cover more classifications of vehicles
12. Encourage accelerated replacement of fleet vehicles
13. Initiate recognition of "Air Quality Action Day"
14. Support Open burning ban during ozone action days
15. Support Rail Service projects (i.e. commuter and freight)
16. Encourage additional greenways and bike paths
17. Support area wide rideshare initiatives
18. Encourage stringent enforcement of smoking vehicle regulations
19. Give preference to bidders with re-powered, rebuilt or re-fueled diesel equipment
20. Implement Land Use Planning and/or Zoning that is environmentally friendly

City of Hendersonville

One Executive Park Drive • Hendersonville, TN 37075 • Telephone (615) 822-1000

Fax (615) 264-5327
Telecommunications Device for Deaf (615) 264-5334

May 28, 2003

Sent via: US Mail

2003 MAY 30 PM 2:20

Mr. Quincy Styke
Tennessee Department of Environment and Conservation
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

RE: Preliminary List of Air Quality Control Measures
City of Hendersonville, Tennessee

Dear Mr. Styke:

Attached is a list of Air Quality Control measures the City of Hendersonville will be considering as part of the Early Action Compact. This list is not intended as any endorsement of the measures by the city. We will be reviewing each measure for effectiveness, costs, practicality, enforceability and other various factors as relate to air quality and the common good for our region and our community.

Many of these measures will require state and regional implementation to be viable and effective. We will be reviewing these with the support of the Nashville Metropolitan Planning Organization for our recommendation, support or action as needed.

Please call me if you have any questions

Sincerely,

Jim Fuqua
Mayor

Cc: Fred Rogers, Planning Director
Jim Harrison, Public Works Director
Jeanne Stevens, Nashville MPO
Hendersonville Alderman

Mayor	Ward One	Ward Two	Ward Three	Ward Four	Ward Five	Ward Six
Jim Fuqua						
Vice Mayor	Scott Foster, P.E.	Jamie Clary	Jo Skidmore	Bill Portman	James Carmack, Jr., M.D.	Doug Buck
Hamilton Frost, Jr.	Jack Long	Scott Sprouse	Mark Skidmore	Fred Qualls	Hamilton Frost, Jr.	Chris Forsythe, J.D.

City of Hendersonville
Preliminary List of Air Quality Control Measures to Consider

1. Encourage and support federal initiatives to add controls on electrical and industrial sources.
2. Encourage and support statewide Vehicle Inspection and Maintenance Programs
3. Support development of a comprehensive mass transit system for the Metropolitan Nashville area.
4. Explore and work to identify possible funding sources for replacement of older vehicles with newer vehicles that produce fewer pollutants.
5. Support initiatives to promote or require truck stop electrification programs.
6. Support land use plans and zoning for the city, county and region which promotes pedestrian traffic, mass transit, walk able communities and reduction of sprawl.
7. Support initiatives by the state to reduce speed limits for trucks and/or all vehicles on interstates.
8. Support prohibiting open burning for commercial and/or all uses.
9. Support initiatives to provide better monitoring for more precise identification and modeling of air quality problems.
10. Support programs such as high occupancy vehicle lanes, commuter park and ride lots and other measures to promote ridesharing.
11. Explore initiatives to reduce commercial generation of pollutants from unique sources such as dry cleaning, painting and other various operations.
12. Support tree preservation measures that limit commercial and residential generation of rubbish that would be hauled or burned.
13. Support identifying and announcing air quality action days that encourage or discourage activities that degrade air quality.
14. Support planning and development of improvements to streets, highways and intersections that provide travel that is more efficient and improves air quality.
15. Strongly support the development of Pedestrian and Bicycle Greenways.

City of Millersville
Recommended Air Quality Control Measures

These recommendations includes, but are not limited to, items the City of Millersville supports to improve Air Quality. With further studies performed by and support from the Nashville Metropolitan Planning Organization this list is subject to amendments and changes.

1. Supports Federal Initiates to add controls on Electrical Utility and Industrial Sources.
2. Supports more stringent and statewide Vehicle Inspection and Maintenance Programs.
3. Supports, study, and explore funding sources for the use of alternative fuel vehicles and diesel fuel additives for Millersville's vehicle fleet and all local government and state government fleets. We are currently studying the possibilities and feasibility of using and storing bio-diesel.
4. Supports the construction of high occupancy vehicle (HOV) lanes and Commuter Park and ride lots. The City can be instrumental in helping locate appropriate site for park and ride lots.
5. Supports and study ride share programs due to high commuter rate in Millersville. Employer transportation management plans for large employers.
6. Supports the need for public transportation in the Nashville Metropolitan Area
7. Supports, study, and explore possible funding sources to replace older City diesel vehicles with more efficient and cleaner burning vehicles.
8. Strongly supports Pedestrian and Bicycle Greenways.
9. Supports the study and possible funding sources to improve the traffic flow of all city, county, and state streets, highways, and intersections.
10. Support tighter regulations prohibiting open burning and explore the possibility of eliminating commercial open burning.
11. Supports truck stop electrification to reduce idling heavy-duty diesel vehicles.
12. Supports land use decisions for the city, county, and state that promotes pedestrian accessibility and discourages decisions that encourage sprawl.

City of White House
Recommend Air Quality Control Measures

These recommendations includes, but are not limited to, items the City of White of House supports to improve Air Quality. With further studies performed by and support from the Nashville Metropolitan Planning Organization this list is subject to amendments and changes.

1. Supports Federal Initiates to add controls on Electrical Utility and Industrial Sources.
2. Supports more stringent and statewide Vehicle Inspection and Maintenance Programs.
3. Supports, study, and explore funding sources for the use of alternative fuel vehicles and diesel fuel additives for White House's vehicle fleet and all local government and state government fleets. The City through the MPO has requested and has received preliminary approval for CMAQ funding for a Hybrid Vehicle. The vehicle will be a test model for the City and an educational tool for the citizens and students of White House.
4. Supports the construction of high occupancy vehicle (HOV) lanes and commuter park and ride lots. The City can be instrumental in helping locate appropriate site for park and ride lots.
5. Supports and study ride share programs due to high commuter rate in White House. Employer transportation management plans for large employers.
6. Supports the need for public transportation in the Nashville Metropolitan Area
7. Supports, study, and explore possible funding sources to replace older City diesel vehicles with more efficient and cleaner burning vehicles.
8. Strongly supports Pedestrian and Bicycle Greenways. The City currently has almost two miles of greenway and is currently in the process of constructing four additional miles that will connect civic buildings, parks, shopping areas, schools, and neighborhoods.
9. Supports the study and possible funding sources to improve the traffic flow of all city, county, and state streets, highways, and intersections.
10. Supports prohibiting open burning. The city recently passed an ordinance prohibiting commercial open burning.
11. Supports truck stop electrification to reduce idling heavy-duty diesel vehicles.
12. Supports land use decisions for the city, county, and state that promotes pedestrian accessibility and discourages decisions that encourage sprawl.

WILLIAMSON COUNTY
Rogers C. Anderson, County Executive
1320 West Main Street, Suite 125
Franklin, Tennessee 37064
(615) 790-5700, Fax (615) 790-5818

June 6, 2003

Mr. Barry R. Stephens, Director
Division of Air Pollution Control
Department of Environment and Conservation
401 Church Street
L & C Annex, 9th Floor
Nashville, Tennessee 37243-1531

2003 JUN -9 PM 3:08

RE: Early Action Compact, "Likely Control Measures"

Dear Mr. Stephens:

Per your letter of 20 May '03, attached you will find a list of "Likely Control Measures," a stipulation of Williamson County remaining in the Early Action Compact (EAC). Please be advised that Williamson County reserves the right to disassociate from the EAC in accordance with the terms of the same.

In recent meeting with representatives of several of the municipalities, it was noted that Division of Air Pollution had not directly contacted these jurisdictions regarding the EAC. This finding was particularly disconcerting given the spirit of the various representations made by yourself and employees of Division of Air Pollution Control at recent Metropolitan Planning Organization (MPO) meetings. To date, the only meaningful outreach has occurred via the efforts of the MPO Staff. It is strongly suggested that Division of Air Pollution Control use the time period while the "likely control measures" are being modeled to engage the several municipalities within Williamson County in a meaningful dialogue regarding the EAC.

Williamson County Government and its Municipalities, recognize the importance of clean air to our citizens, and the implications of being designated a "non-attainment area" by EPA. We want to work in partnership with TDEC and the MPO, to identify a process and programs that will benefit all of Middle Tennessee.

Sincerely,

Rogers C. Anderson
County Executive

/cb

Printed on recycled paper

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC, CO	M	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC,CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	C	V	L
All	Air quality web page/public information	NOx, VOC, CO	C	V	L
OTHERS---					

LIST OF LIKELY CONTROL MEASURES FOR

Williamson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Roger C Anderson	County Executive	6 June 2003

Other signatories are as follows:

NAME	TITLE	DATE

LIST OF LIKELY CONTROL MEASURES FOR

Williamson
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Rogers C. Jackson	County Executive	6 June 2003

Other signatories are as follows:

NAME	TITLE	DATE
City of Franklin Ken B Johnson	City Adm.	June 3, 2003

NAME TITLE DATE

ANNE DUNN
MAYOR
BRIAN J. SWEENEY
VICE-MAYOR
MICHAEL W. WALKER
CITY MANAGER

City of Brentwood

COMMISSIONERS
ANNE DUNN
BRIAN J. SWEENEY
ROBERT L. HIGGS, P.E.
JOE REAGAN
REGINA R. SMITHSON

June 3, 2003

Mr. Barry Stephens, Director
Division of Air Pollution Control
Department of Environment and Conservation
401 Church St.
L&C Annex, 9th Floor
Nashville TN 37243-1531

Dear Mr. Stephens:

This letter is intended to indicate the City of Brentwood's concurrence with the list of "Likely Control Measures" submitted by Williamson County Executive Rogers Anderson as part of the County's continued participation in the Nashville Area Early Action Compact process.

It is understood that concurrence with this list of Likely Control Measures in no way commits the City of Brentwood to implement any of these measures at this time and that any formal commitment by the City of Brentwood to future implementation of air quality control measures through the Early Action Compact would be subject to a vote of the entire Brentwood Board of Commissioners.

If you have any questions regarding the City's position on this matter, please feel free to contact Assistant City Manager Kirk Bednar at (615) 371-0060.

Sincerely

Anne Dunn
Mayor

5211 MARYLAND WAY • BRENTWOOD, TENNESSEE 37027 • PHONE (615) 371-0060
MAILING ADDRESS: P.O. BOX 788 • BRENTWOOD, TN 37024-0788 • FAX (615)370-4767

recycled paper

LIST OF LIKELY CONTROL MEASURES FOR

Williamson
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
Rogers C Jackson	County Executive	6 June 2003

Other signatories are as follows:

NAME	TITLE	DATE
C Kerry B. Jackson	Mayor Town of Thompsons Station	6 June 2003

LIST OF LIKELY CONTROL MEASURES FOR

Williamson
COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME	TITLE	DATE
[signature]	County Executive	6 June 2003

Other signatories are as follows:

NAME	TITLE	DATE
[signature]	City Admin.	June 3, 2003
[signature]	City of Spring Hill Mayor	6-6-03

NAME TITLE DATE

WILLIAMSON COUNTY
Community Development
1320 West Main St., Suite 400
Franklin, Tennessee 37064
615-790-5725
FAX 615-591-8531

MEMORANDUM

TO: Rogers Anderson, County Executive
FROM: Joe Horne, Community Development Director
RE: Early Action Compact (EAC) Signatories
DATE: 6 June '03

This memorandum will serve as an update as to the signatories to the Early Action Compact (EAC). To date, Williamson County, Franklin, Brentwood, Spring Hill and Thompsons Station have formally indicated their interest in the EAC, and documentation of such has been forwarded to TDEC. To follow is the status of the remaining municipalities:

- **Nolensville**- as you know, Mayor Knapper was unable to attend our meeting of 24 May '03. Your proposed letter and attachments were faxed to Mayor Knapper earlier this week. I have not received a response.

- **Fairview**- no representatives of Fairview attended the meeting of 24 May '03. In a conversation yesterday, City Manager Al Deck acknowledged he was not aware of the EAC or its goals. Further, based on this conversation, it is unlikely that Fairview will commit to the EAC until this matter can be taken up with their Board of Mayor and Aldermen.

At this juncture, none of the municipalities have expressed an unwillingness to participate in the EAC. If/when they choose to do so, their intent shall be forwarded to TDEC.

cc File

Charles F. Knapper
Mayor

Tommy Dugger
Alderman

James L. Felts
Alderman

Town Of Nolensville

Gail Phillips
Alderman

Joe Rossi Rositano
Alderman

Cindy Lancaster
Town Recorder

June 6, 2003

Mr. Joe Horne, Director
Williamson County Development
1320 West Main Street, Suite 400
Franklin, Tennessee 37064

Dear Joe,

The Nolensville Board of Mayor and Aldermen have unanimously voted to participate in the Early Action Compact with Williamson County.

Please convey to the Metropolitan Planning Office the Town Of Nolensville has agreed as outlined in your previous letter.

Thank you very much for your cooperation in this matter.

Sincerely,

Charles F. Knapper,
Mayor

Cc: Jeanne Stevens, MPO Coordinator
Metropolitan Government
Board of Mayor and Aldermen

ROBERT DEDMAN
County Executive

RACHEL WARREN
Assistant/Secretary

WILSON COUNTY GOVERNMENT

June 5, 2003

Mr. Barry R. Stephens, P.E.
Director
Division of Air Pollution Control
Tennessee Department of Environment and Conservation

Mr. Stephens,

Re: List of potential control measures that the Wilson County Commission may consider enacting or supporting.

The following is a list of potential control measures that could meet with some favorable consideration from the Wilson County Commission regarding control of air pollution and the pending early action compact agreement (EAC) for the Middle Tennessee Region.

This list should be viewed as a list of those measures which might be considered by the Wilson County Commission. Under no circumstance should they be viewed as a commitment to enact or support any of the measures. Before, the County will be able to abide by an EAC agreement or related control measures; a significant effort must be made on behalf of the Environmental Protection Agency, the Tennessee Department of Environment and Conservation and other interested parties to educate both the County elected officials and the citizens of Wilson County regarding what the issues are that are driving this EAC agreement and what the issues are regarding our air quality and public health. We as county elected officials need to understand clearly the choice we are being asked to make. This choice must be illustrated in simple and concise terminology and the explanation of the choice must also adequately address pros and cons for each means of progressing (i.e. what happens if we continue participating in the EAC and what happens if we don't?). Information I have received and staff reports I have received regarding the pros and cons and regarding recent studies have been confusing and sometimes in conflict with one another. Many important questions have remained unanswered. Finally, it is imperative that the participating municipalities within the MPO be brought up to speed on the early action compact by TDEC and the EPA, if this has not already occurred. It is my opinion that this task should not fall to the various County Executives and County Staffs to try and educate the municipalities within our jurisdiction about this

important subject. I do not have an adequate grasp on all issues surrounding the EAC to sell or even simply educate my County Commission; much less someone else's City Council, about these issues.

With the above being stated, here is a list of control measures that might be considered or supported:

1. **Support evaluation of an Inspection and Maintenance (IM) program EAC-Wide or Statewide.**

   Explanations and Opinions: The elected officials that have been in office since this type of program was enacted in our County are not terribly pleased with the program. Much of this displeasure may be related to a lack of education regarding the reasons for the program. They do not relate the air quality concerns to their everyday lives. Of particular concern to many is the fact that Wilson County has been required to participate and other Counties in the region have not. This proposed expansion might gain some favor given its potential for being perceived as an issue of fairness.

2. **Free Gas Cap Replacement program (In conjunction with IM)**

3. **Local Governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles.**

   Explanations and Opinions: Only if costs to do so are less than or at least equivalent to traditional fuels, vehicles, and infrastructure.

4. **Support statewide NOx RACT Low NOx combustion controls.**

   Explanations and Opinions: If this is referring to controls on heavy industry, the county may support it but we really do not have any local authority to enforce it at this time.

5. **Encourage accelerated replacement with newer lower emitting Vehicles for on road heavy duty diesel vehicles and buses, as well as, for other on- and off-road vehicles.**

   Explanations and Opinions: It is my belief that the County Commission might support this issue regarding the County's own fleets if it were cost effective. Secondly, we could support an aging vehicle replacement subsidy for the general citizenry or private sector but some funding source would have to be provided to support this effort.

6. **Retrofitting local government vehicles (Diesel fleets including school buses) with the means to run on alternative fuels like biodiesel with a low NOx additive.**

Explanations and Opinions: See explanation to #3 above.

7. **Traffic Signalization/Synchronization**

Explanations and Opinions: We may support this, but our local impact is perceived as minimal. We do not have many traffic signals within our jurisdiction that are under county control. Most are either State or City controlled.

8. **Roadside Assistance/Incident Management Program**

Explanations and Opinions: We may support, but this is perceived as something more efficiently operated and undertaken by State Department of Transportation as is evidenced by current State program.

9. **Air Quality Action Day**

Explanations and Opinions: This could probably be supported by resolution of the County Commission if they were made aware of the value as related to health and other air quality related concerns.

10. **Transportation Management Plan for Large Employers**

Explanations and Opinions: We may support encouragement of this but really have no local control or authority over this item.

11. **Open Burning Ban – On High Ozone Days**

Explanations and Opinions: We may support, but it would be difficult to enforce given current staffing levels and responsibilities in relation to the 535 square miles encompassed within our County.

12. **Support enforcement of the Smoking Vehicle Regulation similar to one recently adopted in Davidson County.**

Explanations and Opinions: It is assumed that the local Sheriff's Department would enforce this regulation if enacted. If County Commission were adequately educated as to the impacts this could have, they might pass it.

13. **Participate in a regional initiative to seek early introduction of low sulfur diesel fuels.**

Explanations and Opinions: If this were done through some organization such as the MPO, we might participate.

14. **Public Education and Outreach**

Explanations and Opinions: The County may be willing to participate in various air quality education programs aimed at students in local schools and aimed at the general public; including educational presentations, web page development, public advertisements, etc.

15. **Encourage alternative means of Transportation that can reduce the number of pollutant emitters (cars) on the road system.**

Explanations and Opinions: The County already participates to a small extent in these types of efforts. Recently, the respective county commissions and city councils of Wilson County, the City of Lebanon, the City of Mount Juliet, and Metropolitan Nashville/Davidson County all voted to support local funding of a 37,000,000.00 commuter rail project to run between downtown Nashville and Lebanon, Tennessee. Other efforts within Wilson County such as encouragement of greenways and bikeways are progressing at a slower pace.

Other suggested early action measures from your letter, dated May 20, 2003 were perceived to be totally implausible for local implementation or were perceived to be outside of the realm of action, responsibility, or authority that can be expected of local government.

In closing, it is my hope that this letter fulfills the needed requirements to be met regarding continued participation in the development of an early action compact (EAC) for the region. However, I also hope it serves as an illustration of the large task that lies before us in adequately laying out the choices the region must make regarding air quality compliance. If I can be of further assistance, please let me know.

Sincerely,

Robert Dedman
County Executive
Wilson County, Tennessee