



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Air Pollution Control Division
9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243

March 30, 2004

J.I. Palmer, Jr.
Regional Administrator
US EPA, Region IV
Sam Nunn Atlanta Federal Center
61 Forsythe Street, SW
Atlanta, GA 30303

RE: Tennessee Early Action Compact Submittal for March 31, 2004 Milestone

Dear Mr. Palmer:

In accordance with the Early Action Compact (EAC) agreements, you will find enclosed air quality improvement plans for each of the seven (7) EAC Areas in Tennessee. The enclosed documentation is being submitted on behalf of each EAC area. This submittal is for the purpose of complying with the March 31, 2004 deadline to submit local air quality plans defining the measures to be taken to achieve compliance with the 8-hour ozone National Ambient Air Quality Standard no later than December 31, 2007.

Each local plan includes local measures that are specific and can be federally enforceable as either a part of the State Implementation Plan or Transportation Improvement Program no later than December 31, 2004. The documentation supporting each local plan and the modeling analysis are based on local controls demonstrating attainment of the 8-hour standard. The following information is enclosed:

- Chattanooga EAC Air Quality Improvement Plan
for Hamilton, Marion, and Meigs Counties
(Catoosa and Walker County, GA will make separate submittals)
- Knoxville EAC Air Quality Improvement Plan
for Anderson, Blount, Jefferson, Loudon, Knox, Sevier, and Union
Counties

- Nashville EAC Air Quality Improvement Plan for Cheatham, Davidson, Dickson, Robertson, Rutherford, Sumner, Williamson, and Wilson Counties
- Memphis EAC Air Quality Improvement Plan for Fayette, Tipton, and Shelby Counties (Desoto County, MS and Crittenden County, AR are to be submitted separately)
- Tri-Cities EAC Air Quality Improvement Plan for Carter, Hawkins, Sullivan, Unicoi, and Washington Counties
- Haywood County Air Quality Improvement Plan (Attainment)
- Putnam County Air Quality Improvement Plan (Attainment)
- Status of Statewide Measures
- Modeling Analysis Technical Support Documentation (TSD) (ATMOS TSD Final and Appendices A & B)
- Additional Technical Support Documentation (see CD)
 - Nashville EAC Report from UT 032204
 - TDOT VMT Emissions Growth 1999-2030
 - ATMOS Presentation 040212

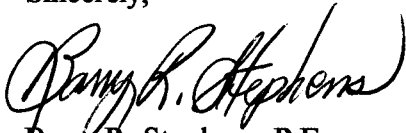
The 2001-2003 ozone monitoring data shows that both Haywood and Putman Counties have demonstrated attainment for the 8-hour ozone National Ambient Air Quality Standard. Haywood and Putnam Counties recognize the importance of air quality as it relates to the health and welfare of its citizens, and for this reason are volunteering to take additional measures. Their efforts at the local level are an attempt to target citizen behavior through education and outreach.

All of the Early Action Compact areas in Tennessee will be substantially impacted by forthcoming federal measures. The Regional impacts of low sulfur diesel fuel and Heavy-Duty Diesel Engine standards will have significant impacts on regional NO_x and VOC emissions as well as an expected benefit from lowering the gasoline sulfur content beginning in 2004. The change in gasoline sulfur content is expected to make considerable emissions reductions from light and some heavy-duty gasoline powered vehicles. Following the implementation of these federal measures, some of the EAC areas in Tennessee with a minimal amount of local voluntary control measures should be able to achieve attainment of the 8-hour ozone standard by 2007.

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Due to time constraints, some documents may not have all of the local signatures. The documents have been signed, we have just not received the originals. They will be forwarded to EPA upon our receipt. I believe this submittal satisfies all requirements of the March 31, 2004 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: Kay Prince, Karen Borel, Dick Schutt, Clifford Beller, and Kenny Richardson
at EPA Region IV
Local Air Programs
Tennessee Air Pollution Control Board
EAC Signatories