

**POLLUTION CONTROL  
DIVISION**

**ANNUAL REPORT  
2008**



***Metro Public Health Dept***  
Nashville / Davidson County

**Mayor of Metropolitan Government of  
Nashville & Davidson County  
The Honorable Karl Dean**

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**The mission of the Metro Public Health Department is to  
promote physical and mental well-being and prevent  
disease, injury and disability for everyone in Nashville.**

**The vision of the Metro Public Health Department is  
“People creating healthy conditions everywhere.”**

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## 1. INTRODUCTION

The 1990 Clean Air Act Amendments state, “The prevention and control of air pollution at its source is a primary responsibility of state and local governments.” Chapter 10.56 of the Metropolitan Code of Laws charges the Metropolitan Board of Health with the responsibility of adopting, promulgating, and enforcing such rules and regulations as necessary to achieve and maintain such levels of air quality as will protect human health and safety, and to the greatest degree practical, prevent injury to plant life and property and foster the comfort and convenience of the inhabitants of the Metropolitan Government area. This report covers the activities conducted by the Metro Public Health Department, Pollution Control Division (PCD) in carrying out these responsibilities for calendar year 2008.

The purpose of the Air Quality Program (includes Pollution Control Division and Vehicle Inspection and Maintenance) is to provide assessment, information and protection products to everyone in Nashville so they can experience healthy living conditions through clean air and reduced exposure to environmental health and safety hazards.

## 2. ENGINEERING ACTIVITIES

Table I and Figures 1 through 5, present the 2008 annual emission inventory for five criteria pollutants (particulate matter, sulfur dioxide, nitrogen dioxide, carbon monoxide, and volatile organic compounds).

Figure 1 shows that miscellaneous sources account for 93% of the total 2008 particulate emissions. Dust from paved roads accounts for 87% of the total 2008 PM<sub>10</sub> emissions. Figure 2 shows that fuel combustion accounts for approximately 94% of the total 2008 sulfur dioxide emissions. Figure 3 shows that the on-road and non-road mobile source emissions account for 83% of the total 2008 nitrogen dioxide emissions. Figure 4 shows that 98% of the 2008 carbon monoxide emissions are contributed by on-road and non-road mobile sources. Figure 5 shows that on-road and non-road mobile sources account for approximately 60% of the total 2008 volatile organic compound emissions, and approximately 17% is contributed by other solvent usage including degreasing, graphic arts, and consumer/commercial solvents.

Table II and Figure 6, are a comparison of Nitrogen Dioxide and Volatile Organic Compound emissions for the past 14 years.

The 2008 Davidson County Hazardous Air Pollutant Emission Inventory is shown in Table III.

During 2008, the Engineering Section reviewed plans and specifications for 48 new and/or modified stationary sources and issued the following permits:

Construction Permits:	89
Operating Permits:	510

In addition to the above permits, 176 permits were issued for asbestos removal and 5 burning permits using an air curtain destructor were issued. Revenue generated from the issuance of permits in 2008 was \$680,220.

During 2008 this agency observed the following compliance source tests:

2	Nitrogen Oxides
2	Carbon Monoxide
1	Sulfur Dioxide
2	Volatile Organic Compound
1	Particulate Matter
101	Pressure-decay tests on gasoline dispensing facilities

## 3. PART 70 OPERATING PERMIT PROGRAM

On October 13, 1993, the Metropolitan Board of Health adopted Regulation No. 13, "Part 70 Operating Permit Program." Subsequently, EPA granted full approval to the Metro Public Health Department, Pollution Control Division's Part 70 Operating Permit Program. All affected facilities were required to submit Part 70 Operating Permit Applications to the Pollution Control Division within twelve months of the effective date of March 15, 1996. The Pollution Control Division received four applications in 1996 and eleven applications during 1997. During that time, two more sources became subject to the Part 70 Operating Permit Program. These two applications were received in 1998. All seventeen applications were reviewed and determined to be complete. Five Part 70 Operating Permits were issued in 1997, six were issued in 1998, and three were issued in 1999. The remaining three permits were issued in 2000. Since that time one facility has expanded production to become a major source while some facilities have closed. The following facilities currently maintain Part 70 Operating Permits:

Permit Number	Facility Name
70-0002	E.I. du Pont de Nemours and Co.
70-0025	Gaylord Opryland Resort and Convention Center
70-0039	Vanderbilt University
70-0040	Zeledyne, LLC
70-0042	Vought Aircraft Industries, Inc.
70-0045	Armstrong Hardwood Flooring Company
70-0050	Metro District Energy System
70-0081	U.S. Smokeless Tobacco Manufacturing, LP
70-0120	Peterbilt Motors Company
70-0154	Aqua Bath Company
70-0156	Gibson Guitar
70-0189	Metro Public Works - Bordeaux Landfill
70-0241	Vanderbilt University Medical Center
70-0255	MM Nashville Energy

#### 4. EMISSION INVENTORY

TABLE I  
2008 DAVIDSON COUNTY ANNUAL EMISSION INVENTORY

STATIONARY SOURCES-TONS PER YEAR										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
<b>TRANS. &amp; MKT. OF VOC</b>										
VOL Storage & Handling	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	34.8
Bulk Gasoline Terminals	0.0	0.0	0.0	0.0	0.2	8.5	0.4	24.7	37.0	244.3
Bulk Gasoline Plants	0.0	0.0	0.0	0.0	0.0	2.0	0.0	4.9	7.0	18.2
Tank Truck Unl. (Stage I)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	202.0	0.0
Vehicle Refuel. (Stage II)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	107.6	0.0
Tank Trucks In Transit	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	61.6	0.0
<b>Subtotal</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.2</b>	<b>10.5</b>	<b>0.4</b>	<b>29.6</b>	<b>420.0</b>	<b>297.4</b>
<b>Total--Area + Point</b>	<b>0.0</b>		<b>0.0</b>		<b>10.7</b>		<b>30.0</b>		<b>717.4</b>	
<b>INDUSTRIAL PROCESSES</b>										
Adhesives	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Aerospace	0.2	0.7	0.0	0.1	0.0	0.4	0.0	0.1	1.1	25.6
Misc. Metal Products	1.3	11.8	0.0	0.0	0.0	0.0	0.0	0.0	18.0	35.4
Inorganic Chemical Mfg.	0.0	39.7	0.0	0.0	0.0	5.8	0.0	4.5	1.0	0.4
Organic Chemical Mfg.	0.0	14.7	0.0	0.0	0.0	7.8	0.0	7.9	0.0	135.5
Textile Mfg.	19.3	39.1	0.0	0.1	7.8	10.4	6.5	9.3	7.5	42.7
Rubber Tire Mfg.	1.2	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.6	22.4
Plastic Products Mfg.	0.2	0.3	0.0	0.0	0.0	0.0	0.0	0.0	2.1	8.4
Wood Products Mfg.	5.4	0.3	0.3	0.0	7.4	0.0	0.6	0.0	95.8	119.4
Clay & Glass	8.8	94.0	0.0	130.0	0.0	777.5	0.0	20.5	0.6	31.6
Mineral Products	69.1	67.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Asphalt Plants	19.5	4.7	12.8	6.6	8.1	2.9	86.0	10.5	15.5	3.8
Paint Mfg.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.8	0.0
Food & Agriculture	4.5	0.4	0.0	0.0	3.4	1.6	2.8	1.1	2.0	51.9
Primary/Sec. Metals	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Large Appliance Coating	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.6	0.0
Ship Building	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Subtotal</b>	<b>129.4</b>	<b>274.0</b>	<b>13.2</b>	<b>136.8</b>	<b>26.6</b>	<b>806.3</b>	<b>95.9</b>	<b>54.0</b>	<b>162.7</b>	<b>477.1</b>
<b>Total--Area + Point</b>	<b>403.4</b>		<b>150.0</b>		<b>833.0</b>		<b>149.9</b>		<b>639.8</b>	

TABLE I (continued)  
2008 DAVIDSON COUNTY ANNUAL EMISSION INVENTORY

STATIONARY SOURCES-TONS PER YEAR										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
<b>NON-IND. SURFACE COAT.</b>										
Architectural	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,112.0	0.0
Auto Refinishing	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	777.7	0.0
Traffic Markings	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	111.4	0.0
<b>Subtotal</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2,001.2</b>	<b>0.0</b>
<b>Total--Area + Point</b>	<b>0.0</b>		<b>0.0</b>		<b>0.0</b>		<b>0.0</b>		<b>2,001.2</b>	
<b>OTHER SOLVENT USE</b>										
Cold Cleaners (exc. perc)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,102.8	0.0
Degreas. (exc cold clean.)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Graphic Arts	0.3	0.3	0.0	0.0	6.6	0.1	4.0	0.0	163.3	1.1
Dry Cleaning (exc. perc)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0
Cons./Comm. Solv. Use	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,856.4	0.0
<b>Subtotal</b>	<b>0.3</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>	<b>6.6</b>	<b>0.1</b>	<b>4.0</b>	<b>0.0</b>	<b>3,127.3</b>	<b>1.1</b>
<b>Total--Area + Point</b>	<b>0.6</b>		<b>0.0</b>		<b>6.6</b>		<b>4.1</b>		<b>3,128.5</b>	
<b>MISC. SOURCES</b>										
Pesticide Application	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	545.3	0.0
Landfills	0.0	1.5	0.0	1.4	0.0	3.4	0.0	64.5	0.0	12.5
Scrap & Waste Material	27.0	21.7	1.6	1.0	14.6	12.2	2.3	34.0	0.3	2.5
Biogenic (PCBEIS)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Dust From Paved Roads	16,255.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Brake and Tire Wear	186.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Construction Projects	700.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Agricultural Tilling	57.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Subtotal</b>	<b>17,226.1</b>	<b>23.1</b>	<b>1.6</b>	<b>2.4</b>	<b>14.6</b>	<b>15.6</b>	<b>2.3</b>	<b>98.4</b>	<b>545.6</b>	<b>15.0</b>
<b>Total--Area + Point</b>	<b>17,249.2</b>		<b>4.0</b>		<b>30.2</b>		<b>100.7</b>		<b>560.6</b>	
<b>FUEL COMBUSTION</b>										
Residential	183.4	0.0	30.0	0.0	466.6	0.0	1,145.4	0.0	886.6	0.0
Commercial/Institutional	14.6	55.6	5.3	1,193.4	128.8	719.5	94.8	355.1	13.7	24.4
Industrial	0.4	113.9	0.0	4,663.7	4.7	974.0	3.6	102.4	0.3	152.7
<b>Subtotal</b>	<b>198.4</b>	<b>169.5</b>	<b>35.4</b>	<b>5,857.1</b>	<b>600.1</b>	<b>1,693.5</b>	<b>1,243.8</b>	<b>457.6</b>	<b>900.5</b>	<b>177.1</b>
<b>Total--Area + Point</b>	<b>367.9</b>		<b>5,892.4</b>		<b>2,293.6</b>		<b>1,701.4</b>		<b>1,077.6</b>	
<b>SOLID WASTE DISPOSAL</b>										
Incinerators	0.8	0.0	0.2	0.0	1.8	0.0	0.4	0.0	0.1	0.0
POTW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	23.2	0.0
TSDf	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Structure Fires (inc. auto/truck)	47.2	0.0	0.0	0.0	0.2	0.0	360.0	0.0	49.5	0.0
Forest & Grass Fires	2.8	0.0	0.0	0.0	0.0	0.0	17.8	0.0	2.6	0.0
<b>Subtotal</b>	<b>50.8</b>	<b>0.0</b>	<b>0.2</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	<b>378.2</b>	<b>0.0</b>	<b>75.4</b>	<b>0.0</b>
<b>Total--Area + Point</b>	<b>50.8</b>		<b>0.2</b>		<b>2.0</b>		<b>378.2</b>		<b>75.4</b>	
<b>TOTAL STATIONARY SOURCES</b>	<b>17,605.0</b>	<b>466.9</b>	<b>50.3</b>	<b>5,996.3</b>	<b>650.1</b>	<b>2,526.0</b>	<b>1,724.6</b>	<b>639.5</b>	<b>7,232.7</b>	<b>967.7</b>
<b>TOTAL STA. AREA + POINT</b>	<b>18,071.9</b>		<b>6,046.6</b>		<b>3,176.1</b>		<b>2,364.2</b>		<b>8,200.4</b>	

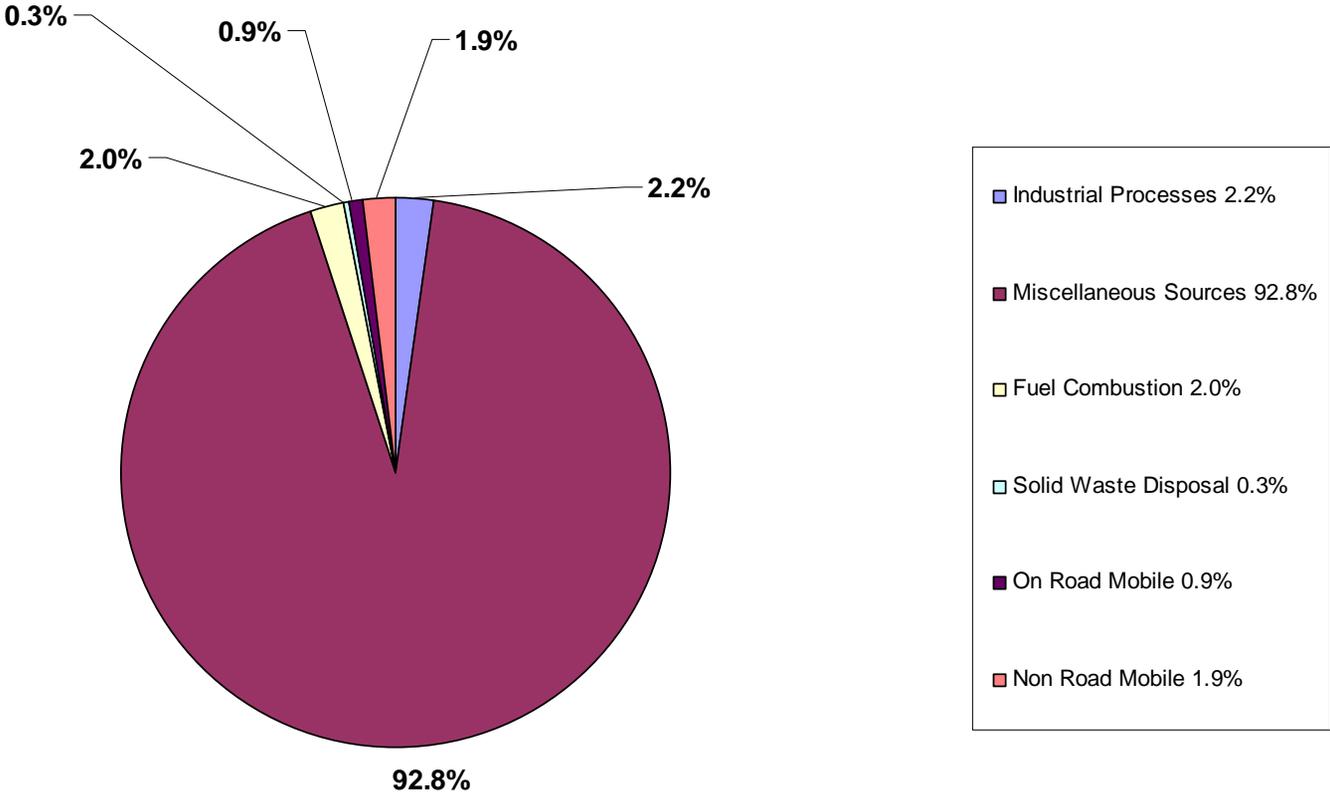
TABLE I (continued)  
2008 DAVIDSON COUNTY ANNUAL EMISSION INVENTORY

MOBILE SOURCES-TONS PER YEAR										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
<b>ON-ROAD MOBILE</b>										
LDV	39.0	0.0	42.3	0.0	3,662.1	0.0	64,429.4	0.0	4,901.7	0.0
LDT1	18.8	0.0	11.8	0.0	1,004.1	0.0	16,718.3	0.0	1,034.4	0.0
LDT2	5.0	0.0	3.6	0.0	353.8	0.0	5,423.8	0.0	412.4	0.0
HDV	108.6	0.0	37.5	0.0	5,937.5	0.0	3,010.9	0.0	357.0	0.0
MC	0.4	0.0	0.8	0.0	28.9	0.0	241.9	0.0	41.1	0.0
<b>Subtotal</b>	<b>171.8</b>	<b>0.0</b>	<b>96.0</b>	<b>0.0</b>	<b>10,986.4</b>	<b>0.0</b>	<b>89,824.4</b>	<b>0.0</b>	<b>6,746.5</b>	<b>0.0</b>
<b>Total--Area + Point</b>	<b>171.8</b>		<b>96.0</b>		<b>10,986.4</b>		<b>89,824.4</b>		<b>6,746.5</b>	
<b>NON-ROAD MOBILE*</b>										
Railroad Locomotives	9.4	0.0	27.4	0.0	377.8	0.0	54.5	0.0	23.7	0.0
Aircraft	14.2	0.0	86.1	0.0	526.3	0.0	1,220.8	0.0	155.5	0.0
Commercial Marine	0.0	0.0	5.6	0.0	58.5	0.0	20.9	0.0	10.5	0.0
Non-road	324.8	0.0	14.2	0.0	3,213.6	0.0	39,189.2	0.0	3,854.0	0.0
<b>Subtotal</b>	<b>348.4</b>	<b>0.0</b>	<b>133.2</b>	<b>0.0</b>	<b>4,176.3</b>	<b>0.0</b>	<b>40,485.5</b>	<b>0.0</b>	<b>4,043.7</b>	<b>0.0</b>
<b>Total--Area + Point</b>	<b>348.4</b>		<b>133.2</b>		<b>4,176.3</b>		<b>40,485.5</b>		<b>4,043.7</b>	
<b>TOTAL MOBILE SOURCES</b>	<b>520.2</b>	<b>0.0</b>	<b>229.2</b>	<b>0.0</b>	<b>15,162.7</b>	<b>0.0</b>	<b>130,309.8</b>	<b>0.0</b>	<b>10,790.2</b>	<b>0.0</b>
<b>TOTAL MOBILE AREA + POINT</b>	<b>520.2</b>		<b>229.2</b>		<b>15,162.7</b>		<b>130,309.8</b>		<b>10,790.2</b>	
<b>TOTAL STATIONARY + MOBILE</b>	<b>18,125.2</b>	<b>466.9</b>	<b>279.5</b>	<b>5,996.3</b>	<b>15,812.8</b>	<b>2,526.0</b>	<b>132,034.5</b>	<b>639.5</b>	<b>18,022.9</b>	<b>967.7</b>
<b>GRAND TOTAL AREA + POINT</b>	<b>18,592.1</b>		<b>6,275.8</b>		<b>18,338.8</b>		<b>132,674.0</b>		<b>18,990.6</b>	

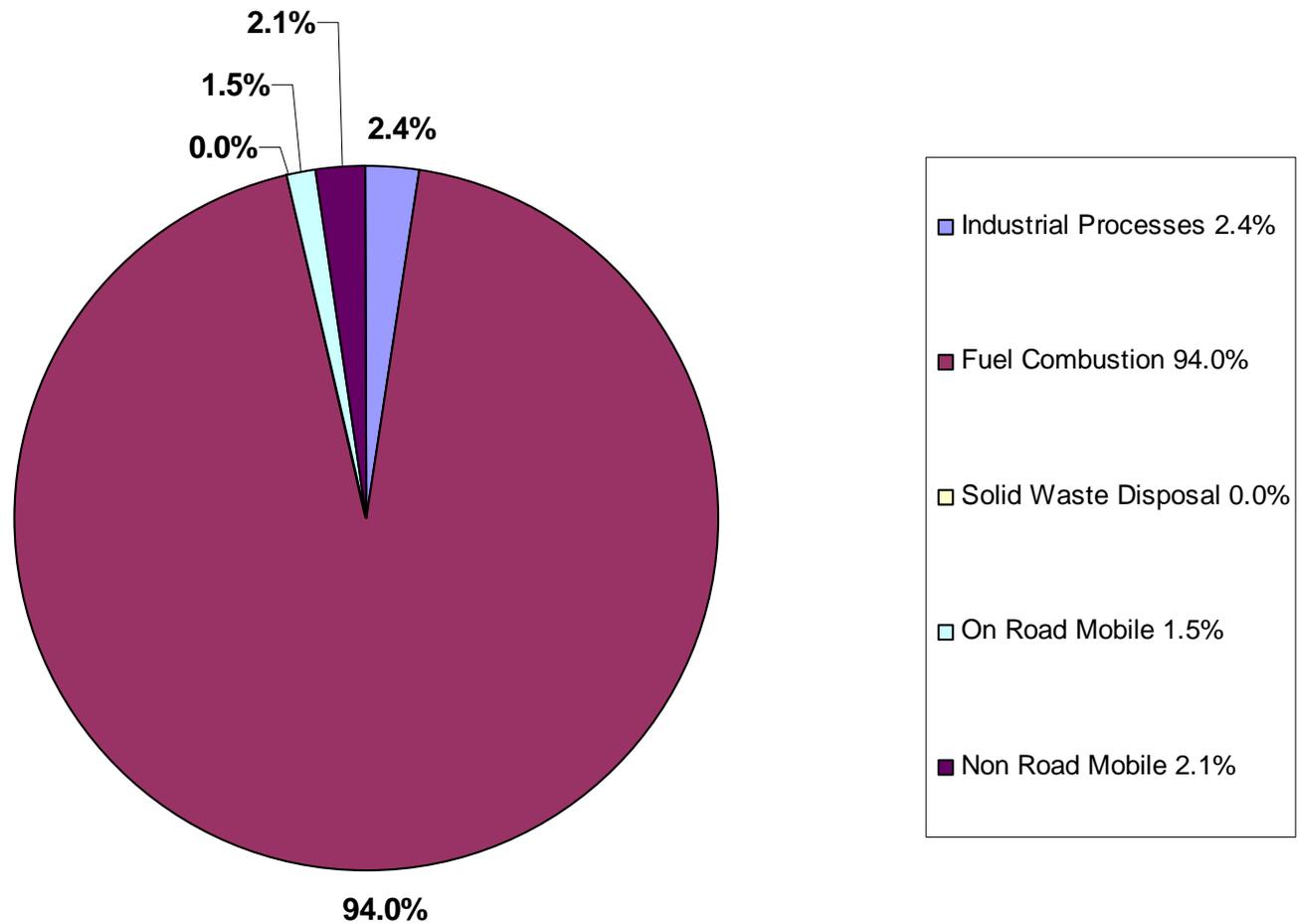
\*Historically, the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine) were calculated without the use of an EPA approved computer model. EPA developed the NONROAD model in 2004. This became the recommend method of calculating the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine). The latest version of this model, NONROAD2005, was used to calculate the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine) for this emissions inventory. Particulate, sulfur dioxide and nitrogen dioxide emissions remained basically unchanged. However, due to changes in the way the model calculates carbon monoxide (CO) and volatile organic compound emissions (VOC), the calculated emissions for 2005 and later years are higher for CO and VOC. Just as with the changes in the on-road mobile emissions, the “real world” emissions have not changed significantly. It is EPA’s opinion that the NONROAD2005 model better estimates non-road mobile emissions.

# Percent Particulate Emissions for Various Sources

## Figure 1

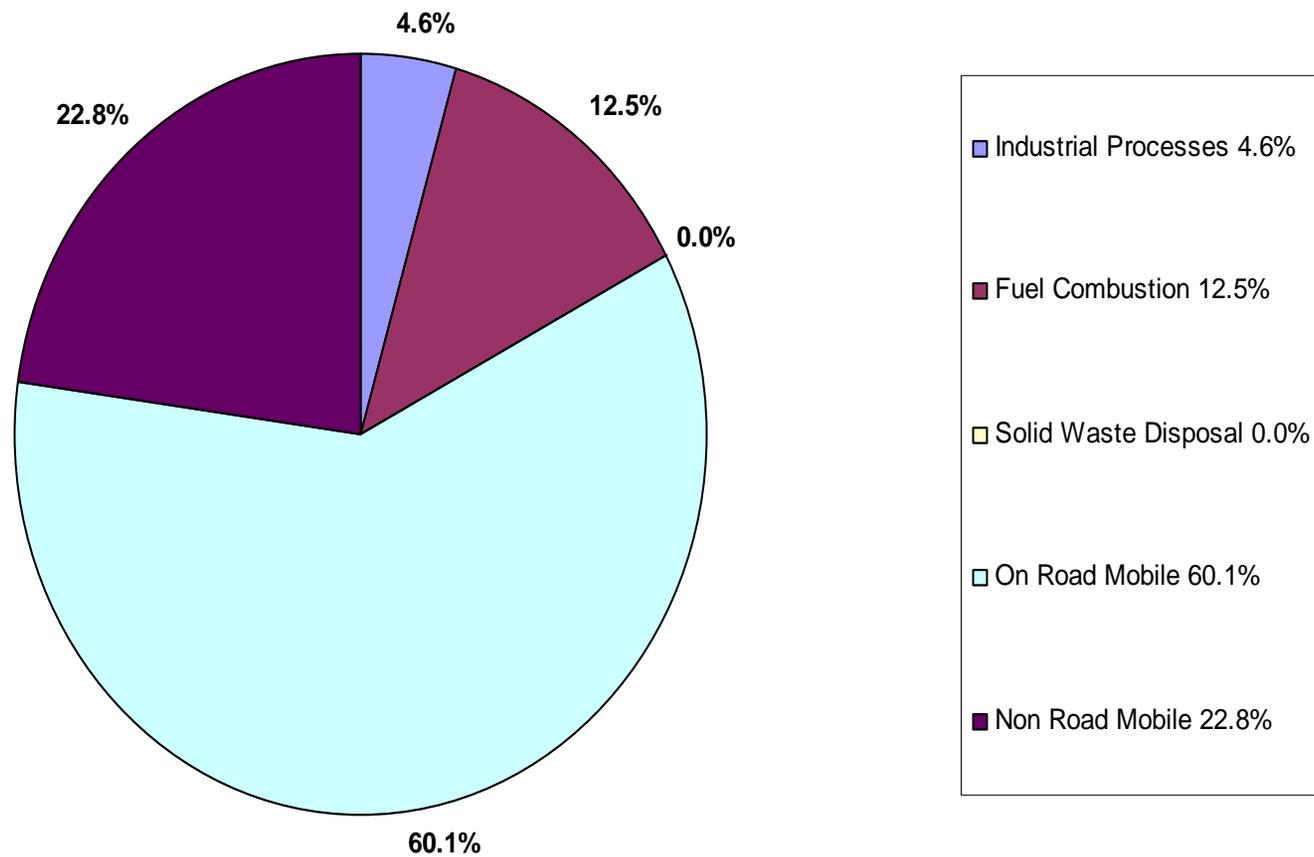


## Percent Sulfur Dioxide Emissions for Various Sources Figure 2



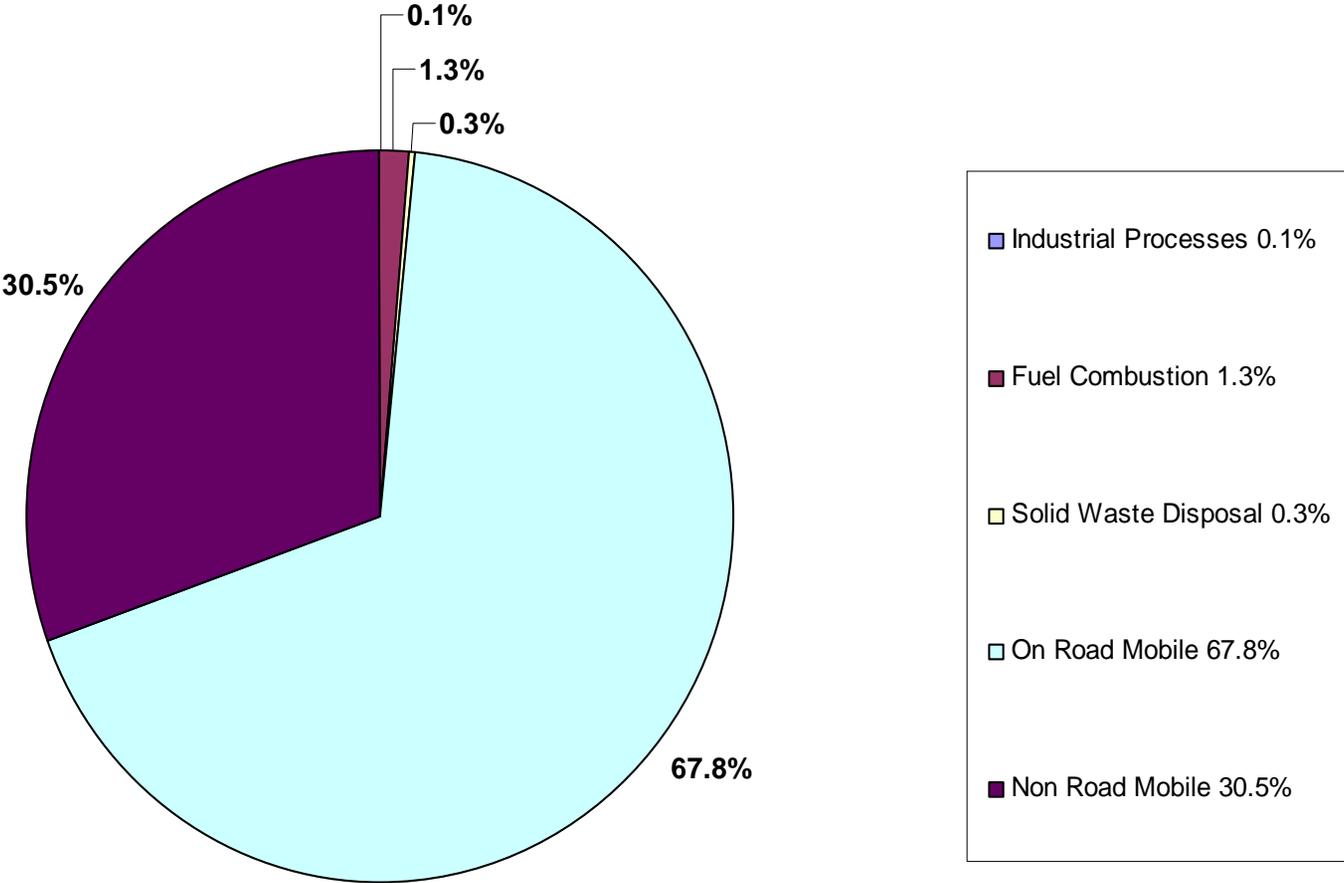
# Percent Nitrogen Oxide Emissions for Various Sources

## Figure 3

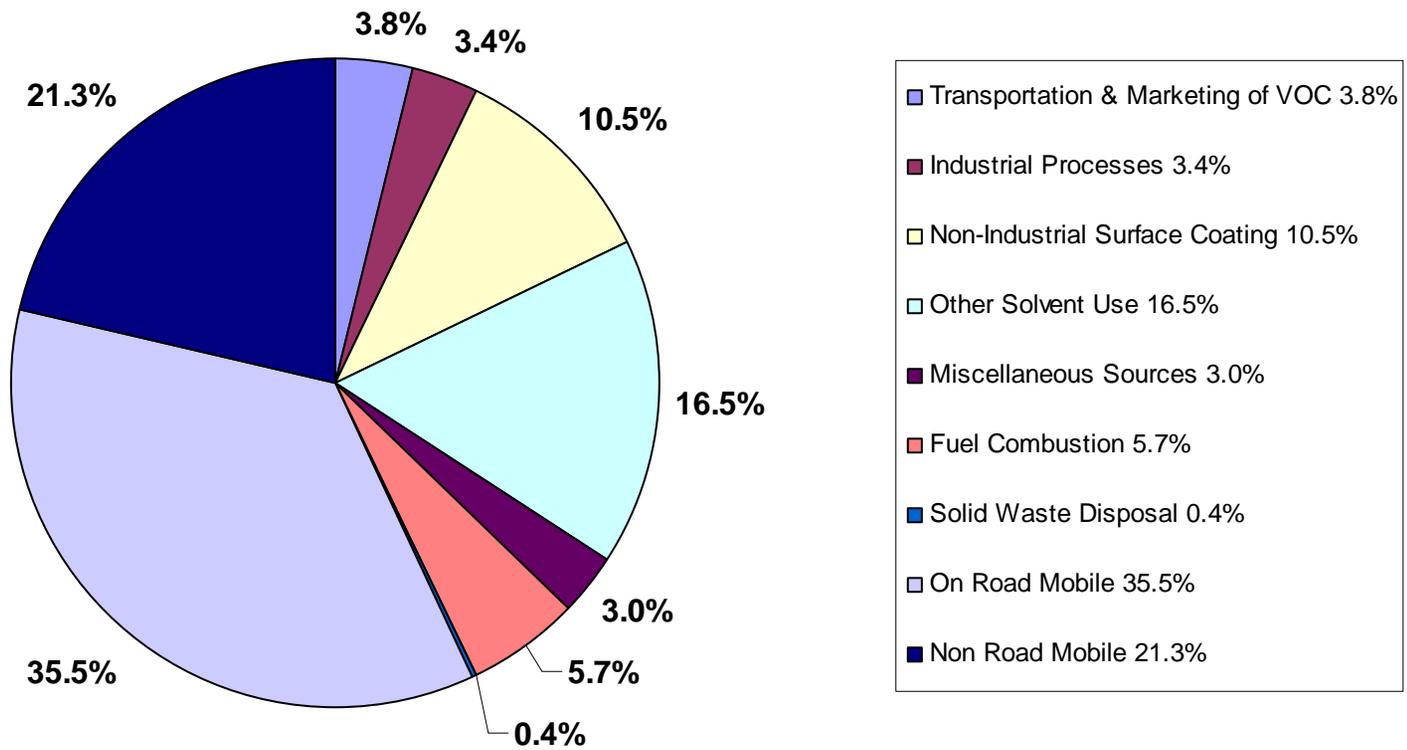


# Percent Carbon Monoxide Emissions for Various Sources

## Figure 4



# Percent Volatile Organic Compound Emissions for Various Sources Figure 5

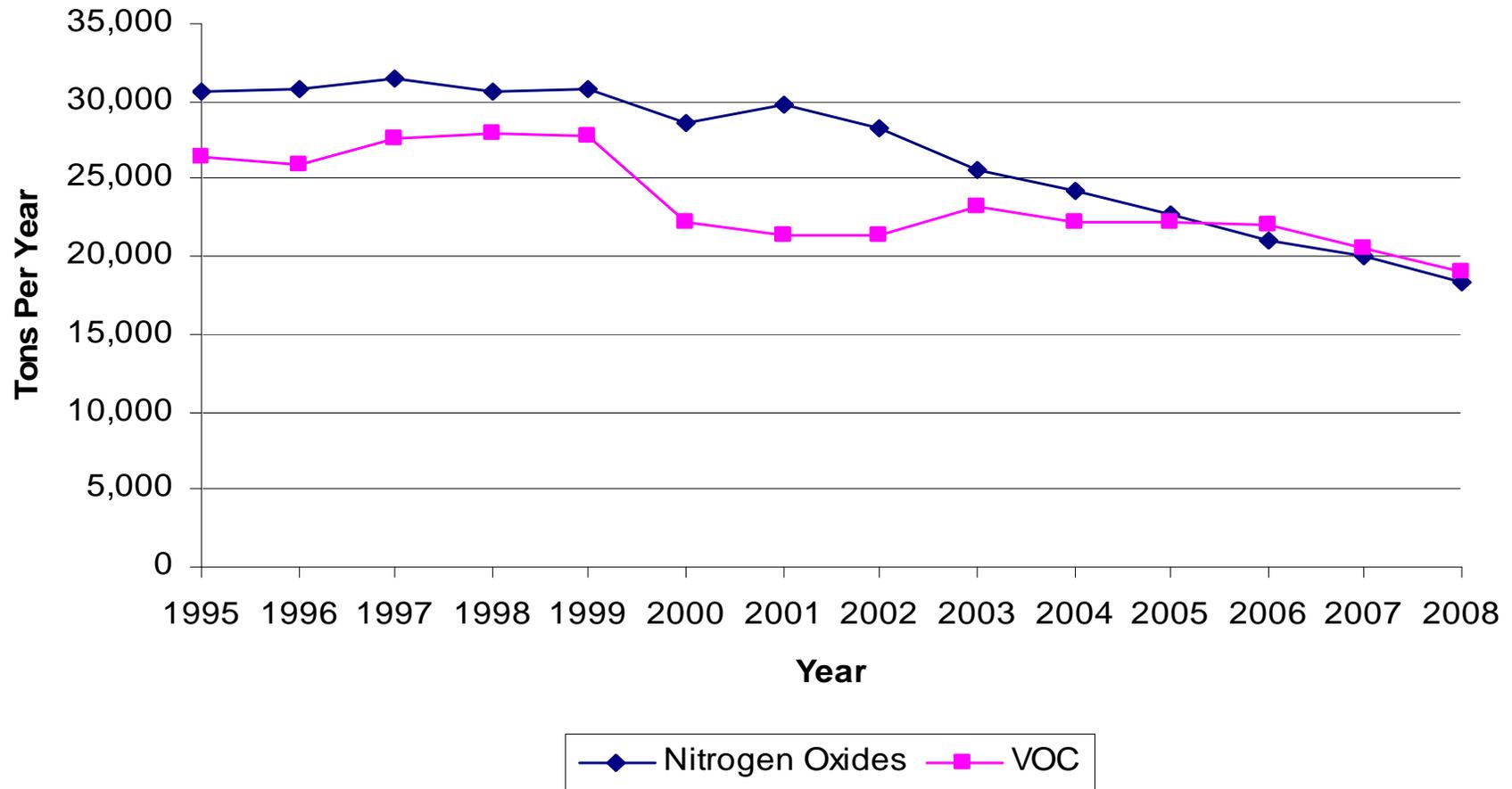


**TABLE II**  
**1995 - 2008 Annual Comparison of Nitrogen Dioxide and Volatile Organic Compound Emissions**

Nitrogen Dioxide (Tons/Year)														
Source Category	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Trans. & Mkt. of VOC	0	6	4	5	5	5	6	4	3	7	10	12	10	11
Industrial Processes	1,307	1,765	2,146	1,877	1,914	1,672	1,365	898	899	890	884	703	1009	833
Other Solvents	0	0	8	0	0	0	3	0	4	5	6	6	7	7
Miscellaneous	16	28	28	6	8	2	7	0	0	0	0	0	27	30
Fuel Combustion	2,626	3,251	3,331	3,023	2,866	3,063	3,118	3,074	3,119	2,565	2,348	2,238	2208	2,294
Solid Waste Disposal	459	452	457	501	458	460	404	144	1	2	2	7	6	2
On-Road Mobile	21,771	20,940	21,216	20,754	21,001	18,548	19,669	19,218	16,875	16,114	14,844	13,352	12380	10,986
Non-Road Mobile	4,464	4,423	4,309	4,511	4,585	4,825	5,207	4,965	4,711	4,657	4,648	4,542	4318	4,176
<b>TOTAL</b>	<b>30,647</b>	<b>30,865</b>	<b>31,499</b>	<b>30,677</b>	<b>30,836</b>	<b>28,575</b>	<b>29,778</b>	<b>28,308</b>	<b>25,612</b>	<b>24,248</b>	<b>22,743</b>	<b>21,018</b>	<b>19,965</b>	<b>18,339</b>
Volatile Organic Compounds (Tons/Year)														
Source Category	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Trans. & Mkt. of VOC	883	729	683	696	691	676	633	660	651	677	667	691	620	717
Industrial Processes	1,730	2,651	2,185	2,579	1,868	1,675	1,976	1,516	1,456	1,344	1,068	1,075	847	640
Non-Ind. Surface Coating	2,182	1,951	1,898	1,920	1,973	1,999	1,885	1,804	1,815	1,845	1,912	1,946	1,932	2,001
Other Solvents	2,844	2,747	2,760	2,752	2,749	3,004	2,999	3,033	3,052	3,101	3,164	3,206	3,052	3,129
Miscellaneous	204	572	569	507	498	511	519	531	536	545	550	551	553	561
Fuel Combustion	5,563	5,639	5,679	5,716	5,780	1,250	827	883	938	767	768	787	800	1,078
Solid Waste Disposal	235	196	128	157	113	101	98	90	76	110	55	80	126	75
On-Road Mobile	9,646	8,770	9,150	9,412	9,852	8,557	8,292	8,227	10,568	9,909	9,036	8,478	7,990	6,747
Non-Road Mobile	3,196	2,713	4,615	4,257	4,274	4,475	4,063	4,552	4,169	3,869	4,990	4,788	4,641	4,044
<b>TOTAL</b>	<b>26,482</b>	<b>25,967</b>	<b>27,666</b>	<b>28,016</b>	<b>27,798</b>	<b>22,247</b>	<b>21,290</b>	<b>21,296</b>	<b>23,260</b>	<b>22,167</b>	<b>22,210</b>	<b>22,040</b>	<b>20,565</b>	<b>18,991</b>

Historically, the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine) were calculated without the use of an EPA approved computer model. EPA developed the NONROAD model in 2004. This became the recommend method of calculating the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine). The latest version of this model, NONROAD2005, was used to calculate the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine) for this emissions inventory. Nitrogen dioxide emissions remained basically unchanged. However, due to changes in the way the model calculates VOC, the calculated emissions for 2005 and later years are higher than in 2004 for VOC. Just as with the changes in the on-road mobile emissions, the “real world” emissions have not changed significantly. It is EPA’s opinion that the NONROAD2005 model better estimates non-road mobile emissions.

**Annual Comparison of Nitrogen Oxides and VOC Emissions**  
**Figure 6**



**TABLE III**  
**2008 Davidson County Hazardous Air Pollutant Emission Inventory**

<b>POLLUTANT</b>	<b>CAS #</b>	<b>TPY</b>
1,1,2,2-tetrachloroethane	79-34-5	0.043
1,1,2-trichloroethane	79-00-5	0.072
1,2,4, Trichlorobenzene	120-82-1	0.206
1,3-Butadiene	106-99-0	24.665
1,3-Dichloropropene	542-75-6	49.013
1,4-Dichlorobenzene	106-46-7	25.547
1,4-Dioxane	123-91-1	1.873
2,2,4-Trimethylpentane	540-84-1	57.923
2-Butanone	78-93-3	0.001
2-Chloroacetophenone	532-27-4	0.001
2-Nitropropane	79-46-9	0.001
4-4'-Methylenediphenyl diisocyanate	101-68-8	0.003
Acetaldehyde	75-07-0	90.412
Acetophenone	98-86-2	7.767
Acrolein	107-02-8	11.222
Acrylonitrile	107-13-1	0.077
Aniline	62-53-3	0.008
Arsenic	00-00-0	0.003
Benzene	71-43-2	301.078
Benzyl chloride	100-44-7	0.118
Biphenyl	92-52-4	6.086
Bis(2-ethylhexyl)phthlate (DEHP)	117-81-7	2.179
Bromoform	75-25-2	0.004
Carbon Disulfide	75-15-0	0.097
Carbon Tetrachloride	56-23-5	0.036
Carbonyl sulfide	463-58-1	4.641
Chlorine	7782-50-5	7.82
Chlorobenzene	108-90-7	21.947
Chromium	00-00-0	0.536
Chromium compounds	00-00-0	0.113
Cobalt Compounds	00-00-0	0.011
Cumene	98-82-8	1.604
Cyanide Compounds	00-00-0	0.404
Dibenzofurans	132-64-9	0.027
Dibutyl Phthlate	84-74-2	0.098
Diethanolamine	111-42-2	0.029
Diethylene Glycol	112-59-4	0.019
Diethylene Glycol Monobutyl Ether	112-34-5	0.034
Dimethyl Formamide	68-12-2	3.508
Dimethyl Phthalate	131-11-1	0.007
Dimethyl Sulfate	77-78-1	0.005
Ethyl Chloride	75-00-3	2.498
Ethylbenzene	100-41-4	59.47
Ethylene Dichloride	107-06-2	0.014
Ethylene Glycol	107-21-1	19.839

**TABLE III**  
**Davidson County Hazardous Air Pollutant Emission Inventory Continued**

Ethylene Oxide	75-21-8	4.735
Ethylidene Dichloride	75-34-3	0.053
Formaldehyde	50-00-0	97.145
Glycol Ethers	00-00-0	15.79
Hexamethylene diisocyanate	822-06-0	0.16
Hexane	110-54-3	186.492
Hydrogen chloride	7647-01-0	150.764
Hydrogen Fluoride	7664-39-3	14.747
Hydrogen Sulfide	7783-06-4	0.006
Hydroquinone	123-31-9	0.061
Isooctane	540-84-1	0.002
Isophorone	78-59-1	0.387
Lead compounds	00-00-0	0.046
Manganese Compounds	00-00-0	0.78
Methanol	67-56-1	272.71
Methyl Chloride	74-87-3	70.177
Methyl Chloroform	71-55-6	118.84
Methyl Hydrazine	60-34-4	0.027
Methyl Isobutyl Ketone	108-10-1	11.668
Methyl Methacrylate	80-62-6	0.116
Methyl Tertiary Butyl Ether	1634-04-4	10.839
Methylene Chloride	75-09-2	36.223
m-Xylene	108-38-3	65.221
Naphthalene	91-20-3	27.186
Nickel compounds	00-00-0	0.058
n-xylene	1330-20-7	2.228
o-Xylene	95-47-6	33.757
p-Dichlorobenzene	106-46-7	0.014
Phenol	108-95-2	0.403
Phthalic Anhydride	85-44-9	0.855
POM as 16-PAH	00-00-0	0.237
Propionaldehyde	123-38-6	15.301
Propylene Dichloride	78-87-5	0.005
Propylene Oxide	75-56-9	0.264
p-Xylene	106-42-3	0
Quinone	106-51-4	0.041
Selenium Compounds	00-00-0	0.09
Styrene	100-42-5	9.771
t-1,2-dichloroethene	156-60-5	0.063
Tetrachloroethylene (Perc)	127-18-4	9.328
Toluene	108-88-3	382.344
Trichloroethylene	79-01-6	3.321
Triethylamine	121-44-8	0.567
Trimethylbenzene	95-63-6	0.017
Vinyl Acetate	108-05-4	0.109
Vinyl Chloride	75-01-4	0.105
Vinylidene Chloride	75-35-4	0.005
Xylenes	1330-20-7	258.489
<b>Total of All Hazardous Air Pollutants</b>		<b>2502.606</b>

## 5. FIELD ENFORCEMENT ACTIVITIES

Field enforcement includes two main areas of compliance activities: (1) Inspection of stationary sources; and (2) Citizen complaint investigation. All stationary sources are inspected annually. These inspections include a physical tour of the facility, checking of air pollution control equipment, fuel usage, emissions, recordkeeping, and general facility conditions. Citizen complaints are investigated to determine if there is a valid air pollution problem and, if so, appropriate action is taken. During 2008 this agency conducted:

- 1614 inspections of stationary air pollution sources;
- 351 inspections of asbestos removal sites;
- 32 indoor air quality inspections;
- 95 complaint investigations; and
- Observed 101 pressure-decay and blockage tests on gasoline dispensing facilities.

During 2008, this agency issued 236 notices of violation and 5 consent agreements. Total penalties collected were \$12,856.

## 6. MONITORING ACTIVITIES

During 2008 this agency operated nine air monitoring sites in Davidson County. Figure 7 shows the location of each of these sites. The addresses and pollutants monitored are shown in Table IV. All ambient air monitoring is conducted in strict accordance with Federal guidelines. A list of the National Ambient Air Quality Standards for all criteria pollutants is presented in Table V.

Particulate matter is measured at five sites. Three sites measure PM<sub>10</sub>, and two sites measure PM<sub>2.5</sub>. Two of the PM<sub>10</sub> sites (Trevecca College and McCann Elementary School) are manual, where PM<sub>10</sub> is measured by operating a selective size inlet sampler (SSI), and the filters are removed for weighing. A third PM<sub>10</sub> site is operated at the Lentz Public Health Department to aid in the generation of a daily Air Quality Index (AQI). Fine particulate (PM<sub>2.5</sub>) samplers are operating at Lockeland Middle School and Hillwood High School. Two manual monitors, one continuous monitor (used for AQI purposes) and a speciation monitor are in operation at Lockeland. One manual monitor is operating at Hillwood. A continuous monitor was installed at Hillwood in November, 2005. The PM<sub>2.5</sub> monitor located at Wright Middle School ceased operation December 31, 2007 with EPA's concurrence.

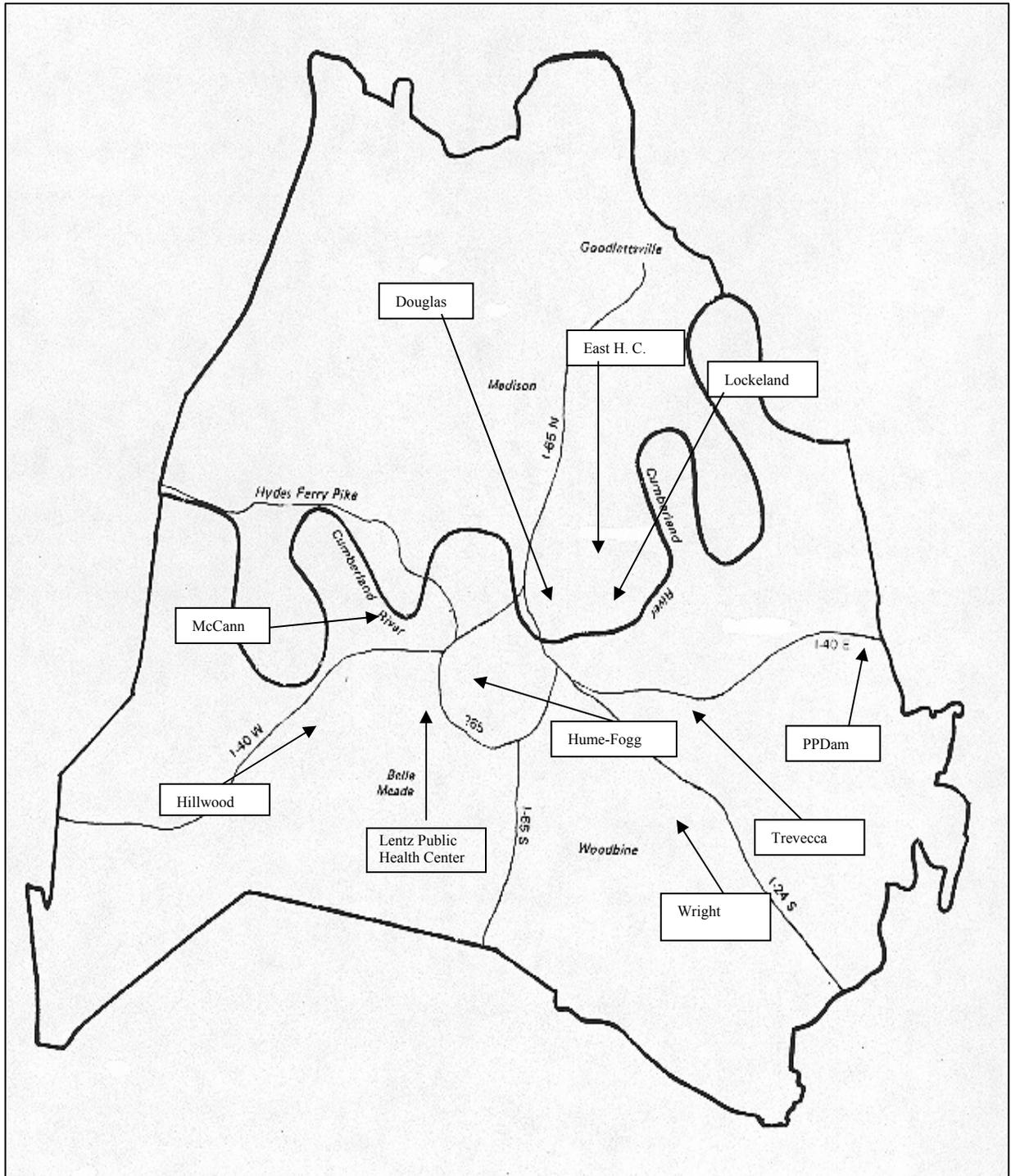
Carbon monoxide was measured by a continuous monitor at Hume Fogg High School. The carbon monoxide monitor located at Douglas Park ceased operation April 30, 2007 with EPA's concurrence. Ozone is measured by continuous monitors at East Health Center and Percy Priest Dam. The East Health Center also houses a continuous sulfur dioxide monitor and a continuous nitrogen oxide/nitrogen dioxide monitor.

During the pollen season, March through October, the PCD operates a Durham sampler measuring pollen. The Durham sampler is located on the roof of the Metro Public Health Department parking garage at 311 23<sup>rd</sup> Avenue North.

The AQI and pollen count are made available to the public by calling (615) 340-0488 and on the Metro Public Health Department's website which can be found at <http://health.nashville.gov>.

## LOCATION OF AIR MONITORING SITES

Figure 7



**TABLE IV  
AIR MONITORING SITE LOCATION & CLASSIFICATION**

Site No.	Address	UTM Coordinates	Land Use	Pollutants Sampled
----------	---------	-----------------	----------	--------------------

47-037-0002	Trevecca Nazarene College 333 Murfreesboro Road	522.1	3999.9	CC-C	PM <sub>10</sub> **
47-037-0011	East Nashville Health Center 1015 East Trinity Lane	522.9	4006.7	CC-R	SO <sub>2</sub> *, NO <sub>2</sub> **, Ozone*
47-037-0021	Hume-Fogg Magnet School 700 Broadway	519.7	4001.7	CC-C	CO*
47-037-0023	Lockeland Middle School 101 South Seventeenth St.	523.5	4003.5	CC-R	PM <sub>2.5</sub> **
47-037-0024	McCann School 1300 56th Avenue North	513.1	4002.0	CC-R, I	PM <sub>10</sub> *
47-037-0025	Wright Middle School*** 180 McCall Street	523.9	3995.1	S-R	PM <sub>2.5</sub> **
47-037-0026	Percy Priest Dam	533.9	4000.7	Background	Ozone**
47-037-0031	Douglas Park**** 210 North Seventh St.	521.3	4003.6	CC-R	CO*
47-037-0036	Hillwood High School 400 Davidson Road	511.4	3997.1	S-R	PM <sub>2.5</sub> **
AQI Site	Lentz Public Health Center 311 23 <sup>rd</sup> Avenue North	517.3	4000.6	CC-C	PM <sub>10</sub>
<u>Land Use Terms</u> CC-Center City    S-Suburban I-Industrial    C-Commercial    R-Residential		<u>Monitor Classification</u> *NAMS-National Air Monitoring Stations **SLAMS-State/Local Air Monitoring Stations			

\*\*\*The PM<sub>2.5</sub> monitor located at Wright Middle School, 180 McCall Street ceased operation December 31, 2007 with EPA's concurrence.

\*\*\*\*The CO monitor located at Douglas Park, 210 North Seventh Street ceased operation April 30, 2007 with EPA's concurrence.

CONTAMINANTS	PRIMARY STANDARD			SECONDARY STANDARD		
	CONCENTRATION		AVERAGE INTERVAL	CONCENTRATION		AVERAGE INTERVAL
	µg/m <sup>3</sup>	PPM		µg/m <sup>3</sup>	PPM	
PM <sub>10</sub>	150		24-HR <sup>(1)</sup>	Same as Primary		
PM <sub>2.5</sub>	15		AAM <sup>(2)</sup>	Same as Primary		
	35		24-HR <sup>(3)</sup>	Same as Primary		
Sulfur Dioxide	80	0.03	AAM	1,300	0.5	3-HR
	365	0.14	24-HR <sup>(4)</sup>			
Carbon Monoxide	40,000	35.0	1-HR <sup>(4)</sup>	NONE		
	10,000	9.0	8-HR <sup>(4)</sup>	NONE		
Ozone	235	0.12	1-HR <sup>(5)</sup>	Same as Primary		
		0.075	8-HR <sup>(6)</sup>	Same as Primary		
Nitrogen Dioxide	100	0.05	AAM	Same as Primary		
Lead	1.5		QA	Same as Primary		

AAM – Annual Arithmetic Mean      QA – Quarterly Average

1. Not to be exceeded more than once per year on average over a three year period.
2. To attain this standard, the 3-year average of the weighted annual mean PM<sub>2.5</sub> concentrations from single or multiple community-oriented monitors must not exceed 15.0µg/m<sup>3</sup>.
3. To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35µg/m<sup>3</sup> (effective December 17, 2006).
4. Not to be exceeded more than once per year.

5. The standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is  $\leq 1$ .
6. To attain this new standard adopted in March 2008, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.075ppm.

## PARTICULATE MATTER

The air pollutant called “particulate matter” includes airborne pollutants of materials such as dust, soot, pollen, aerosols, etc. Particulates range in diameter from 0.005 to 250 microns. There are many sources of particulate matter that includes both natural and anthropogenic (man-made).

PM<sub>10</sub> and PM<sub>2.5</sub> focus on those particles with aerodynamic diameters smaller than 10 micrometers and 2.5 micrometer respectively, which are likely to be responsible for adverse health effects because of their ability to reach the lower regions of the respiratory tract. Particulate matter has a negative effect on breathing and respiratory systems. It aggravates existing respiratory and cardiovascular disease. The elderly, children and people with chronic pulmonary or cardiovascular disease, or asthma are especially sensitive to the effects of particulate matter.

The concentration of particulate matter in the ambient air ( $\mu\text{g}/\text{m}^3$ ) is computed by measuring the mass of the particulate matter collected and the volume of air sampled. For determining the average concentrations of particulate matter, a 24-hour sampling period is used. After sampling for 24 hours, the filter is removed and returned to the laboratory where it is allowed to equilibrate and is weighed.

The Pollution Control Division operates two sites equipped with manual, intermittent PM<sub>10</sub> monitors. One site is also equipped with a collocated manual PM<sub>10</sub> monitor. The PCD also operates two sites equipped with manual PM<sub>2.5</sub> monitors. Both of the two PM<sub>2.5</sub> sites have continuous PM<sub>2.5</sub> monitors operating.

Tables VI and VII present a summary of the measured PM<sub>10</sub> concentrations during 2008. This data shows that the ambient air quality standard for PM<sub>10</sub> was not exceeded in 2008. Tables VIII and IX and Figures 8 and 9 compare the PM<sub>10</sub> concentrations for the past 10 years. Tables X, XI, XII and XIII present a summary of the 2008 PM<sub>2.5</sub> data. Figures 10 and 11 summarize the annual 98<sup>th</sup> percentile of 24-hour monitored concentrations and the maximum 24 hour annual average PM<sub>2.5</sub> concentrations for the last calendar quarter of 1999, and the years 2000 - 2008. Figure 10 shows that Davidson County is in compliance with the 24-hour average standard based on the 3-year average of the annual 98<sup>th</sup> percentile of 24-hour monitored concentrations. Figure 11 shows that based on the 2006 - 2008 data, Davidson County will comply with the annual average PM<sub>2.5</sub> National Ambient Air Quality Standard. In order to determine compliance with the annual PM<sub>2.5</sub> standard, the monitor data from the Hendersonville site (Sumner County) may be spatially averaged with the Davidson County data provided that the data meets the requirements for spatial averaging outlined in the Federal Register. If allowed data from all four sites will be averaged, and if the 3-year average of the annual arithmetic mean is less than or equal to 15  $\mu\text{g}/\text{m}^3$ , the Middle Tennessee area will demonstrate attainment with the PM<sub>2.5</sub> standard. For the period of 2006 - 2008, the Middle Tennessee area was in attainment with the annual NAAQS for PM<sub>2.5</sub> even without spatial averaging.

**TABLE VI**  
**2008 SUMMARY OF PM<sub>10</sub> ( $\mu\text{G}/\text{M}^3$ )**

SITE LOCATION	Trevecca	McCann
Number of Observations	57	59
Maximum 24-Hr Concentration	38	38
Date of Maximum Concentration	7/17	7/29

2nd Maximum 24-Hr Concentration	38	37
Date of 2 <sup>nd</sup> Maximum 24-Hr. Concentration	9/03	7/17
Annual Arithmetic Mean	20	21
Number of Exceedance of 24-Hr Standard	0	0

**TABLE VII**  
**2008 QUARTERLY COMPARISON OF PM<sub>10</sub> ARITHMETIC MEAN (µG/M<sup>3</sup>)**

Site Location	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	Annual
Trevecca	13	21	27	20	20
McCann	16	22	28	19	21

**TABLE VIII**  
**1998 – 2008 24-HOUR MAXIMUM PM<sub>10</sub> CONCENTRATIONS (µG/M<sup>3</sup>)**

Site Location	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Trevecca	70	68	81	60	47	51	45	62	58	58	38
East*	50	52	63	46	49	42	*	*	*	*	0
Lockeland*	53	55	61	46	56	56	*	*	*	*	0
McCann	56	60	79	61	53	58	47	59	57	53	38

**TABLE IX**  
**1998 – 2008 ANNUAL AVERAGE PM<sub>10</sub> CONCENTRATIONS (µG/M<sup>3</sup>)**

Site Location	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Trevecca	32	31	33	30	22	25	24	25	23	24	20
East*	25	24	27	24	21	23	*	*	*	*	0
Lockeland*	25	24	26	24	24	24	*	*	*	*	0
McCann	28	27	30	29	24	27	25	28	25	26	21

\* Due to the density of PM<sub>10</sub> monitoring sites in Davidson County and the history of the Davidson County PM<sub>10</sub> values being well below the NAAQS for PM<sub>10</sub>, the Environmental Protection Agency recommended that the monitors at East and Lockeland be taken out of service on June 30, 2003. Therefore, these monitors were permanently taken out of service in 2003.

**TABLE X**  
**2008 SUMMARY OF PM<sub>2.5</sub> (µG/M<sup>3</sup>)**

SITE LOCATION	Lockeland	Lockeland Collocated	Hillwood
Number of Observations	358	66	362
Maximum 24-Hr Concentration	31.5	33.7	35.7
Date of Maximum Concentration	7/18	7/18	7/19
2nd Maximum 24-Hr Concentration	29.8	25.6	31.0
Date of 2 <sup>nd</sup> Maximum 24-Hr. Concentration	7/20	2/24	7/18
Annual Arithmetic Mean	11.5	12.7	10.9
Number of Exceedances of 24-Hr Standard	0	0	1

**TABLE XI**  
**2008 QUARTERLY COMPARISON OF PM<sub>2.5</sub> ARITHMETIC MEAN (µG/M<sup>3</sup>)**

Site Location	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	Annual
Lockeland	10.78	11.25	14.84	9.58	11.57
Lockeland (collocated)	10.16	11.17	17.66	10.64	12.77
Wright*	0.0	0.0	0.0	0.0	0.0
Hillwood	10.06	10.71	14.18	8.80	10.94

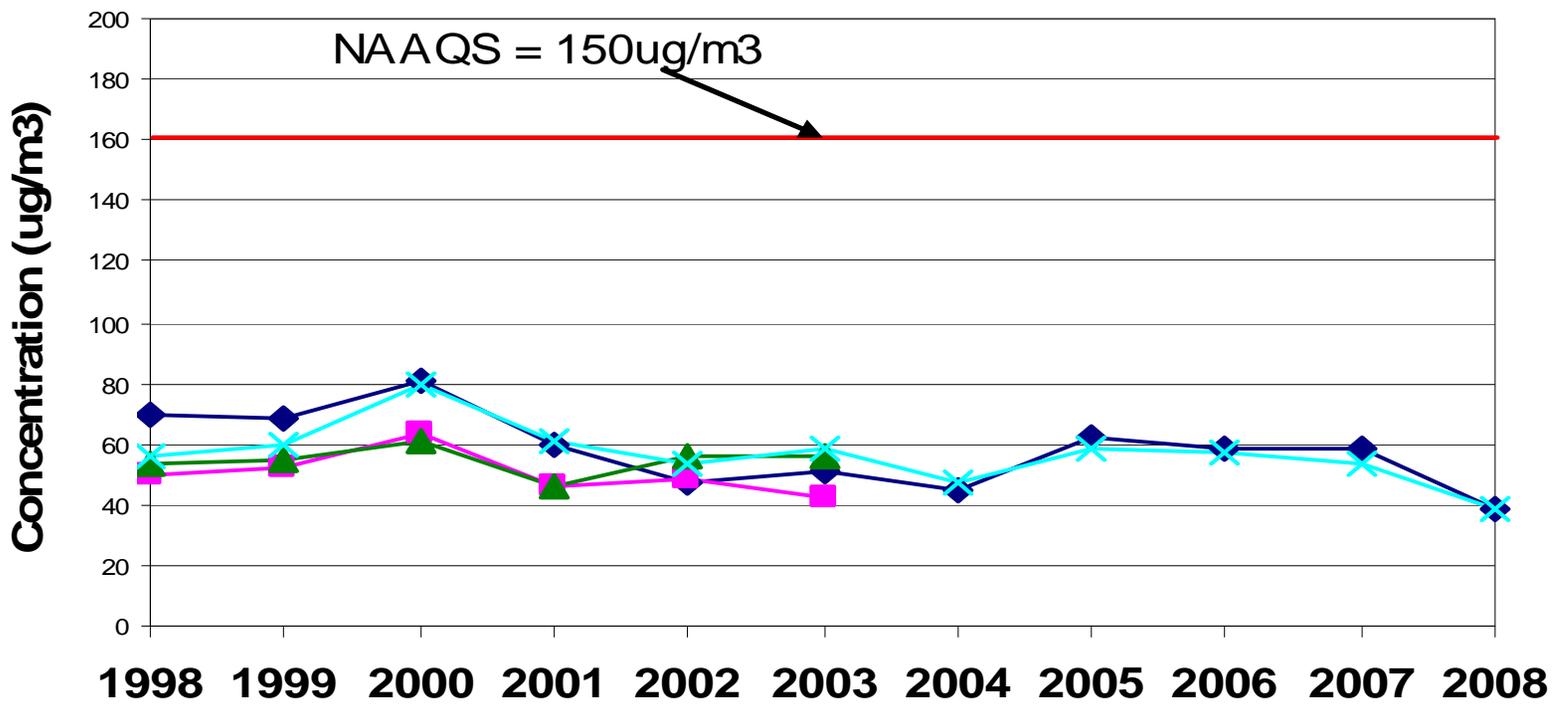
<b>TABLE XII</b>								
<b>2001 - 2008 24-HOUR MAXIMUM PM<sub>2.5</sub> CONCENTRATIONS (µG/M<sup>3</sup>)</b>								
<b>Site Location</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Lockeland	38.2	39.8	42.3	36.6	58.6	37.2	46.6	31.5
Lockeland (collocated)	37.0	32.6	39.0	30.4	36.6	31.2	44.9	33.7
Wright*	33.4	32.8	42.4	31.4	38.5	36.6	41.27	0
Hillwood	35.5	35.7	42.1	33.9	54.3	35.7	43.0	35.7

<b>TABLE XIII</b>							
<b>2003 - 2008 ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS (µG/M<sup>3</sup>)</b>							
<b>Site Location</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>LATEST 3 YEAR AVERAGE</b>
Lockeland	na	13.1	15.0	14.2	13.8	11.57	13.2
Lockeland (collocated)	14.3	13.2	13.6	14.0	14.8	12.77	13.8
Wright*	na	13.1	14.2	14.1	14.3	na <sup>†</sup>	na <sup>†</sup>
Hillwood	na	12.1	13.6	13.4	12.1	10.94	12.1
Sumner County	13.4	12.8	14.8	13.2	13.9	12.16	13.0
<b>Spatial Avg. of Valid Monitors</b>	13.9	12.8	14.4	13.7	13.7	11.8	13.0

<sup>†</sup> The PM<sub>2.5</sub> monitor located at Wright Middle School, 180 McCall Street ceased operation December 31, 2007 with EPA's concurrence.

According to the Environmental Protection Agency, there were quality assurance problems with the data generated by the Lockeland POC1 monitor during 2002 and 2003. We believe the data to be good data representative of the PM<sub>2.5</sub> concentrations at the Lockeland site. However, due to EPA's ruling, the data from the collocated site at Lockeland (the POC2 site) will be substituted for the primary site's (POC1) data for 2002 and 2003. Also, for determination of compliance with the National Ambient Air Quality Standards (NAAQS), the data from the Sumner County monitor operated by the State of Tennessee may be spatially averaged with the three sites in Davidson County provided that the data meets specific requirements outlined in the Federal Register. For the three year period of 2006 - 2008, the Middle Tennessee area was in attainment with the PM<sub>2.5</sub> NAAQS even without spatial averaging.

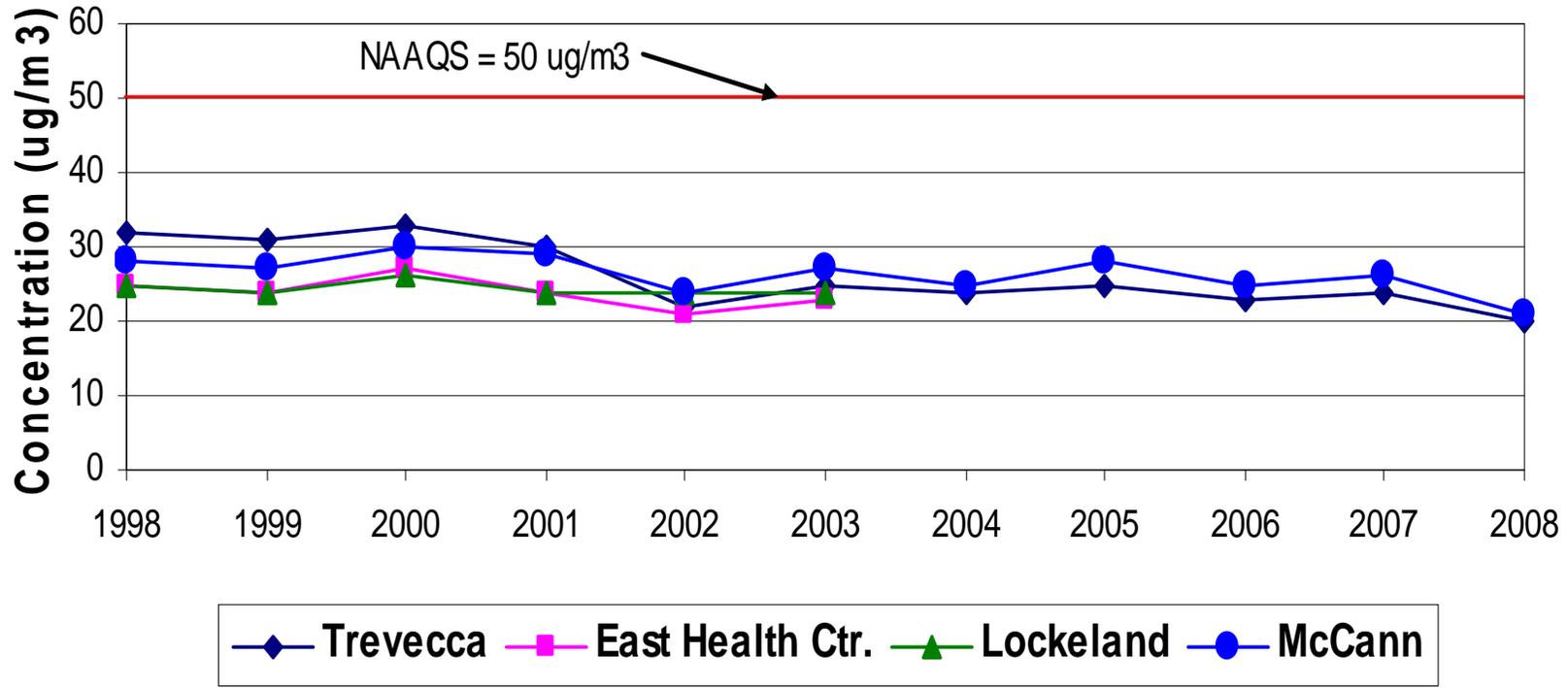
**MAXIMUM 24-HOUR PM<sub>10</sub> CONCENTRATIONS (ug/m<sup>3</sup>)**  
**Figure 8**



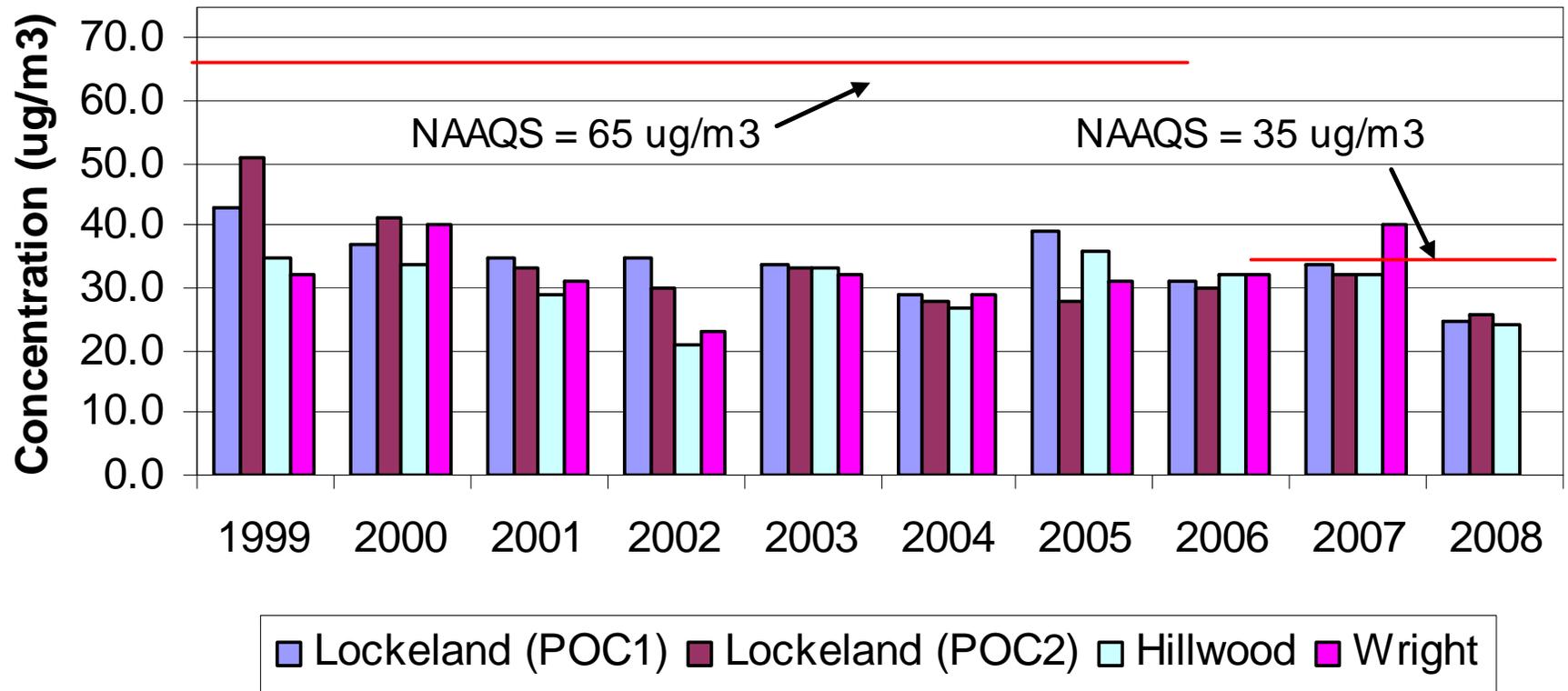
◆ Trevecca    ■ East Health Ctr.    ▲ Lockeland    × McCann

# ANNUAL AVERAGE PM<sub>10</sub> CONCENTRATIONS (ug/m<sup>3</sup>)

## Figure 9



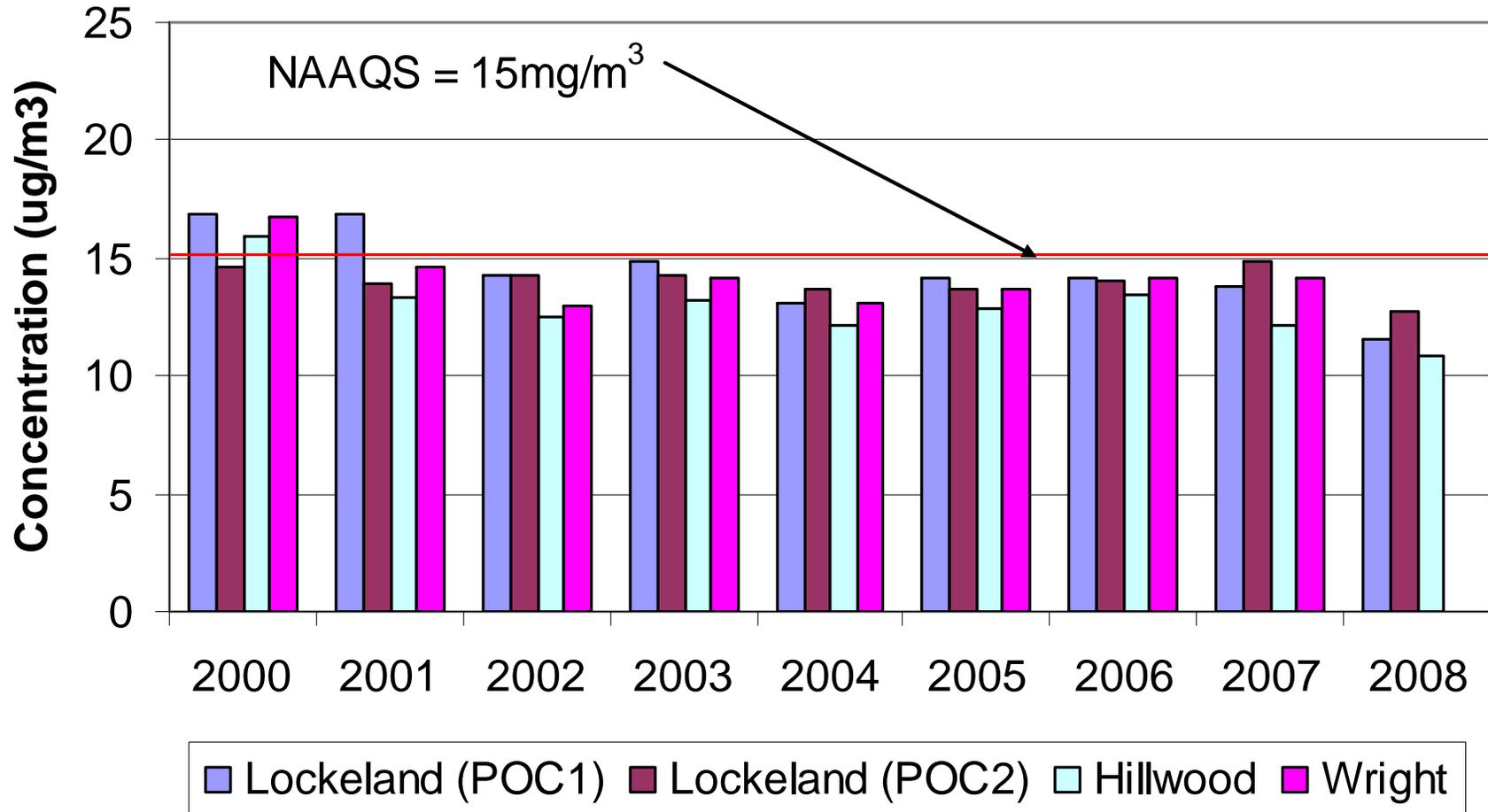
## ANNUAL 98TH PERCENTILE OF 24-HOUR PM<sub>2.5</sub> CONCENTRATIONS (ug/m<sup>3</sup>) Figure 10



On December 17, 2006, the 24 hour PM 2.5 standard was reduced from 65 $\mu$ G/M<sup>3</sup> to 35 $\mu$ g/m<sup>3</sup>. Attainment is demonstrated when the 3-year average of the 98th percentile of 24 hour monitored concentrations is less than or equal to 35 $\mu$ g/m<sup>3</sup>. The 3-year average for Lockland and Hillwood demonstrate attainment with the more stringent standard.

# ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS (ug/m<sup>3</sup>)

## Figure 11



## LEAD

The traditional major sources of ambient lead are from the combustion of leaded gasoline, and the manufacture of lead storage batteries. During 1997, the Metro Public Health Department operated high-volume samplers at two sites. Samples were taken every 6th day on the same schedule as the PM<sub>10</sub> samplers. The filters were analyzed for suspended lead. Table XIV is a summary of the suspended lead concentrations measured in 1997. This data shows that the Ambient Air Quality Standard of 1.5 µg/m<sup>3</sup> averaged on a calendar quarter was not exceeded in 1997. The maximum calendar quarter concentration measured over the six years previous to 1997 was 0.10 µg/m<sup>3</sup>. This data indicates that ambient lead concentrations are relatively insignificant. Based on low monitored lead levels and EPA guidance, ambient monitoring for lead was discontinued in Nashville and Davidson County on December 31, 1997.

<b>TABLE XIV</b>					
<b>1997 QUARTERLY COMPARISON OF LEAD, ARITHMETIC MEAN (µG/M<sup>3</sup>)</b>					
<b>SITE</b>	<b>1<sup>ST</sup></b>	<b>2<sup>ND</sup></b>	<b>3<sup>RD</sup></b>	<b>4<sup>TH</sup></b>	<b>ANNUAL</b>
MHDA—1400 8 <sup>th</sup> Avenue North	0.06	0.06	0.06	0.06	0.06
NES—1214 Church Street	0.08	0.07	0.07	0.07	0.07

## SULFUR DIOXIDE

Sulfur dioxide is a heavy, pungent, colorless gas that combines easily with water vapor to form sulfuric acid. The major health concerns associated with exposure to sulfur dioxide include effects on breathing, respiratory illness, alterations in the lungs' defenses, and aggravation of existing cardiovascular disease. Sulfur dioxide was measured at East Health Center (site 0011) during 2008. Table XV presents a summary of this data. The data shows that the annual arithmetic mean, the 24-hour average or the 3-hour average standards of 0.03 ppm, 0.14 ppm and 0.5 ppm respectively were not violated in 2008. The main source of sulfur dioxide in Metropolitan Nashville and Davidson County is from fuel combustion.

<b>TABLE XV</b>													
<b>2008 SULFUR DIOXIDE (PPM), SITE 247-037-0011, EAST HEALTH CENTER</b>													
<b>MONTH</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>ANNUAL</b>
No. of Observations	740	692	736	717	738	715	739	738	714	737	716	740	8722
Arithmetic Mean	0.001	0.002	0.003	0.004	0.001	0.004	0.002	0.001	0.001	0.001	0.001	0.001	0.002
Highest 24-Hr Conc.	0.004	0.006	0.005	0.007	0.004	0.005	0.005	0.004	0.003	0.003	0.004	0.003	0.007
Date of Highest 24-Hr Conc.	1/21	2/21	3/17	4/21	5/24	6/12	7/11	8/19	9/26	10/19	11/29	12/08	4/21
2nd Highest 24-Hr Conc.	0.003	0.005	0.004	0.006	0.003	0.005	0.005	0.003	0.002	0.003	0.003	0.003	0.006
Date of 2 <sup>nd</sup> Highest 24-Hr Conc.	1/05	2/11	2/23	4/23	5/23	6/15	7/07	8/18	9/18	10/22	11/11	12/22	4/23
Highest 3-Hr Conc.	0.009	0.013	0.009	0.013	0.010	0.008	0.006	0.014	0.010	0.010	0.011	0.012	0.014
Date of Highest 3-Hr Conc.	1/21	2/15	3/17	4/21	5/24	6/12	7/04	8/18	9/25	10/19	11/29	12/22	8/18
2nd Highest 3-Hr Conc.	0.008	0.012	0.008	0.010	0.007	0.007	0.006	0.013	0.007	0.009	0.006	0.011	0.013
Date of 2 <sup>nd</sup> Highest 3-Hr Conc.	1/09	2/11	3/29	4/23	5/23	6/26	7/07	8/16	9/22	10/15	11/01	12/08	2/15
Annual or 3-Hr Exceedances	0	0	0	0	0	0	0	0	0	0	0	0	0

## NITROGEN DIOXIDE

Air is composed of approximately 78% nitrogen and 21% oxygen. When combustion occurs at high temperatures, such as in automobile engines and in other fossil fuel combustion, nitrogen combines with oxygen to form several different gaseous compounds collectively known as oxides of nitrogen (NO<sub>x</sub>). Of these, nitrogen dioxide (NO<sub>2</sub>) and nitric oxide (NO) are the most important from an air pollution standpoint. Nitrogen dioxide can irritate the lungs and lower resistance to respiratory infections. Nitrogen dioxide contributes to the formation of ozone through a chemical reaction with volatile organic compounds in the presence of sunlight. On-road mobile sources emitted 60% of the nitrogen dioxide emissions in 2008 with light duty cars and trucks responsible for 34% of the total nitrogen dioxide emissions.

Nitrogen dioxide was measured at East Health Center (site 0011) during 2008. Table XVI presents a summary of this data and shows that the annual arithmetic mean standard of 0.053 PPM for nitrogen dioxide was not violated in 2008.

**TABLE XVI**  
**2008 NITROGEN DIOXIDE (PPM), SITE 247-037-0011, EAST HEALTH CENTER**

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
No. of Observations	738	694	737	714	737	715	737	739	713	740	716	737	8717
Arithmetic Mean	0.017	0.015	0.015	0.014	0.013	0.012	0.014	0.014	0.013	0.017	0.018	0.013	0.015
Highest 24-Hr Conc.	0.026	0.024	0.030	0.026	0.25	0.025	0.027	0.021	0.026	0.029	0.032	0.023	0.032
Date of Highest 24-Hr Conc.	1/28	2/28	3/12	4/23	5/06	6/20	7/18	8/15	9/19	10/31	11/04	12/29	11/04
2nd Highest 24-Hr Conc.	0.025	0.022	0.023	0.023	0.020	0.021	0.022	0.020	0.024	0.027	0.029	0.020	0.030
Date of 2 <sup>nd</sup> Highest 24-Hr Conc.	1/16	2/15	3/10	4/16	5/13	6/25	7/19	8/04	9/29	10/30	11/05	12/30	3/12
No. of 24-Hour Conc													
0.0 - 0.049	31	29	31	30	31	30	31	31	30	31	30	31	366
0.050 - 0.089	0	0	0	0	0	0	0	0	0	0	0	0	0
0.090 - 0.129	0	0	0	0	0	0	0	0	0	0	0	0	0
0.130 - 0.169	0	0	0	0	0	0	0	0	0	0	0	0	0

## OZONE

Ozone (O<sub>3</sub>) is an unstable, pungent gas in the stratosphere, about ten miles above the earth, which protects us by shielding us from the sun's ultraviolet rays. Tropospheric ozone at the earth's surface has a different effect. It is an eye, nose and throat irritant. It can lower a person's resistance to infection, cause shortness of breath, and over time could damage the lungs. It is also harmful to plants and animals.

Ozone is not released directly from sources. It is produced by a complex series of chemical reactions called photochemical oxidation involving the reaction of nonmethane hydrocarbons and nitrogen dioxide in the presence of heat and sunlight. Ozone is a seasonal problem occurring normally from April through October when warm, sunny weather is abundant. High ozone levels occur in the afternoon after the temperature has risen and the precursors have had time to react. The major sources of volatile organic compounds include various types of industrial processes, surface coating, solvent usage, fuel combustion and automobiles. Tables XVII and XVIII are summaries of the 1-hour ozone concentrations for 2008. The data shows that the one-hour NAAQS of 0.12 ppm was not exceeded in 2008. The maximum one-hour average concentration of 0.092 ppm was measured at Percy Priest Dam (site 0026) on August 8, 2008. Table XXI compares the measured ozone concentration for the past several years.

**TABLE XVII**

**2008 OZONE (PPM), DAILY MAXIMUM 1-HOUR AVERAGE VALUES, SITE 247-037-0011, EAST HEALTH CENTER**

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
No. of Observations	744	694	739	717	740	717	737	739	714	738	720	744	8743
Highest 1-Hr Conc.	0.035	0.052	0.060	0.074	0.073	0.075	0.086	0.084	0.069	0.067	0.062	0.039	0.086
Date of Highest Conc.	1/29	2/17	3/12	4/22	5/23	6/21	7/17	8/04	9/08	10/04	11/02	12/28	7/17
2nd Highest 1-Hr Conc.	0.033	0.038	0.056	0.069	0.068	0.069	0.066	0.084	0.061	0.063	0.052	0.035	0.084
Date of 2 <sup>nd</sup> Highest Conc.	1/10	2/27	3/21	4/23	5/25	6/02	7/19	8/20	9/23	10/05	11/03	12/09	8/04
3rd Highest 1-Hr Conc.	0.033	0.037	0.054	0.064	0.067	0.068	0.066	0.075	0.061	0.060	0.049	0.033	0.084
Date of 3 <sup>rd</sup> Highest Conc.	1/28	2/09	3/13	4/30	5/06	6/15	7/24	8/18	9/24	10/06	11/01	12/19	8/20
4th Highest 1-Hr Conc.	0.032	0.036	0.052	0.063	0.066	0.068	0.063	0.074	0.060	0.053	0.049	0.033	0.075
Date of 4 <sup>th</sup> Highest Conc.	1/01	2/28	3/26	4/16	5/22	6/24	7/18	8/01	9/21	10/03	11/05	12/30	6/21
No. of 1-Hr Exceedances	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 1-Hr Concentrations													
0.000 - 0.044	744	690	657	601	549	587	586	574	627	710	705	744	7774
0.045 - 0.084	0	4	82	116	191	130	150	165	87	28	15	0	968
0.085 - 0.124	0	0	0	0	0	0	1	2	0	0	0	0	1
0.125 - 0.164	0	0	0	0	0	0	0	0	0	0	0	0	0
0.165 - 0.204	0	0	0	0	0	0	0	0	0	0	0	0	0
0.205 - 0.404	0	0	0	0	0	0	0	0	0	0	0	0	0
0.405 - 0.504	0	0	0	0	0	0	0	0	0	0	0	0	0
0.505 - 0.604	0	0	0	0	0	0	0	0	0	0	0	0	0

**TABLE XVIII**

**2008 OZONE (PPM), DAILY MAXIMUM 1-HOUR AVERAGE VALUES, SITE 247-037-0026, PERCY PRIEST DAM**

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
No. of Observations	744	694	737	717	741	711	739	727	716	736	717	741	8720
Highest 1-Hr Conc.	0.038	0.054	0.066	0.075	0.075	0.078	0.083	0.092	0.067	0.070	0.067	0.041	0.092
Date of Highest Conc.	1/07	2/17	3/12	4/22	5/23	6/24	7/17	8/04	9/23	10/04	11/02	12/28	8/04
2nd Highest 1-Hr Conc.	0.038	0.044	0.060	0.073	0.074	0.071	0.078	0.084	0.067	0.067	0.061	0.039	0.084
Date of 2 <sup>nd</sup> Highest Conc.	1/29	2/28	3/26	4/23	5/06	6/23	7/19	8/20	9/24	10/05	11/01	12/30	8/20
3rd Highest 1-Hr Conc.	0.037	0.043	0.059	0.071	0.068	0.068	0.078	0.081	0.064	0.067	0.061	0.037	0.083
Date of 3 <sup>rd</sup> Highest Conc.	1/28	2/08	3/13	4/16	5/07	6/21	7/30	8/18	9/03	10/06	11/05	12/09	7/17
4th Highest 1-Hr Conc.	0.036	0.043	0.059	0.068	0.066	0.068	0.074	0.075	0.064	0.058	0.060	0.036	0.081
Date of 4 <sup>th</sup> Highest Conc.	1/08	2/12	3/21	4/30	5/05	6/25	7/18	8/19	9/08	10/10	11/03	12/03	8/18
No. of 1-Hr Exceedances	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 1-Hr Concentrations													
0.000 - 0.044	744	686	592	564	504	557	517	523	591	678	681	741	7378
0.045 - 0.084	0	8	145	153	237	154	222	201	125	58	36	0	1339
0.085 - 0.124	0	0	0	0	2	1	4	3	6	0	0	0	3
0.125 - 0.164	0	0	0	0	0	0	0	0	0	0	0	0	0
0.165 - 0.204	0	0	0	0	0	0	0	0	0	0	0	0	0

<b>TABLE XIX</b>													
<b>2008 OZONE (PPM), DAILY MAXIMUM 8-HOUR AVERAGE VALUES, SITE 247-037-0011, EAST HEALTH CENTER</b>													
<b>MONTH</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>ANN UAL</b>
No. of Observations	744	696	744	720	744	720	744	744	720	744	720	744	8784
Highest 8-Hr Avg. Conc.	0.033	0.044	0.052	0.065	0.062	0.065	0.078	0.074	0.062	0.057	0.048	0.032	0.078
Date of Highest Conc.	1/28	2/17	3/21	4/22	5/25	6/21	7/17	8/04	9/08	10/04	11/02	12/08	7/17
2nd Highest 8-Hr Avg. Conc.	0.031	0.034	0.051	0.064	0.061	0.064	0.060	0.073	0.052	0.054	0.038	0.032	0.074
Date of 2nd Highest Conc.	1/29	2/09	3/12	4/23	5/23	6/24	7/19	8/20	9/03	10/05	11/01	12/09	8/04
3rd Highest 8-Hr Avg. Conc.	0.028	0.033	0.051	0.058	0.060	0.060	0.056	0.062	0.051	0.048	0.038	0.030	0.073
Date of 3rd Highest Conc.	1/01	2/26	3/13	4/17	5/22	6/19	7/24	8/18	9/21	10/06	11/03	12/30	8/20
4th Highest 8-Hr Avg. Conc.	0.027	0.032	0.049	0.058	0.058	0.060	0.055	0.061	0.051	0.043	0.036	0.028	0.065
Date of 4th Highest Conc.	1/01	2/16	3/26	4/30	5/07	6/23	7/03	8/19	9/23	10/03	11/06	12/14	5/01
No. of 8-Hr Exceedances	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 1-Hr Concentrations													
0.000 - 0.064	744	696	744	713	737	711	735	725	717	744	720	744	8730
0.065 - 0.084	0	0	0	7	7	9	7	19	3	0	0	0	52
0.085 - 0.104	0	0	0	0	0	0	2	0	0	0	0	0	2
0.105 - 0.124	0	0	0	0	0	0	0	0	0	0	0	0	0
0.125 - 0.374	0	0	0	0	0	0	0	0	0	0	0	0	0
Greater Than 0.374	0	0	0	0	0	0	0	0	0	0	0	0	0

<b>TABLE XX</b>													
<b>2008 OZONE (PPM), DAILY MAXIMUM 8-HOUR AVERAGE VALUES, SITE 247-037-0026, PERCY PRIEST DAM</b>													
<b>MONTH</b>	<b>JAN</b>	<b>FEB</b>	<b>MAR</b>	<b>APR</b>	<b>MAY</b>	<b>JUN</b>	<b>JUL</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>ANN UAL</b>
No. of Observations	744	696	737	720	744	711	744	720	720	737	714	738	8725
Highest 8-Hr Avg. Conc.	0.036	0.049	0.058	0.071	0.065	0.068	0.074	0.079	0.058	0.063	0.053	0.035	0.079
Date of Highest Conc.	1/28	2/17	3/12	4/22	5/06	6/24	7/17	8/04	9/03	10/04	11/02	12/30	8/04
2nd Highest 8-Hr Avg. Conc.	0.036	0.041	0.057	0.065	0.064	0.062	0.067	0.077	0.056	0.060	0.051	0.034	0.077
Date of 2nd Highest Conc.	1/29	2/28	3/13	4/23	5/07	6/21	7/19	8/20	9/08	10/05	11/05	12/03	8/20
3rd Highest 8-Hr Avg. Conc.	0.035	0.038	0.056	0.064	0.062	0.062	0.065	0.065	0.056	0.056	0.050	0.034	0.074
Date of 3rd Highest Conc.	1/07	2/16	3/21	4/16	5/01	6/23	7/18	8/18	9/19	10/06	11/01	12/08	7/17
4th Highest 8-Hr Avg. Conc.	0.033	0.036	0.056	0.064	0.062	0.062	0.059	0.064	0.056	0.047	0.050	0.034	0.071
Date of 4th Highest Conc.	1/08	2/09	3/26	4/17	5/23	6/25	7/02	8/01	9/21	10/15	11/03	12/09	4/22
No. of 8-Hr Exceedances	0	0	0	0	0	0	0	2	0	0	0	0	2
No. of 1-Hr Concentrations													
0.000 - 0.064	744	696	737	691	722	694	727	691	720	732	714	738	8606
0.065 - 0.084	0	0	0	29	22	17	17	24	0	5	0	0	114
0.085 - 0.104	0	0	0	0	0	0	0	5	0	0	0	0	5
0.105 - 0.124	0	0	0	0	0	0	0	0	0	0	0	0	0
0.125 - 0.374	0	0	0	0	0	0	0	0	0	0	0	0	0
Greater Than 0.374	0	0	0	0	0	0	0	0	0	0	0	0	0

Tables XIX and XX are summaries of the maximum 8-hour average ozone concentrations for 2008. The EPA adopted a new 8-hour ozone standard of 0.075 ppm in March 2008. The maximum eight-hour average concentration of 0.079 ppm was measured at Percy Priest Dam (site 0026) on August 4, 2008. The 8-hour ozone NAAQS is the three year average of the annual fourth highest 8-hour value. Therefore, the new 8-hour ozone standard was exceeded in Davidson County during 2008. Table XXI compares the 1-hour daily maximum ozone concentrations from 1984 through 2008 at East Health Center and Percy Priest Dam. Table XXII compares the 8-hour ozone concentrations for the past ten years.

**TABLE XXI**  
**1985 - 2008 ANNUAL COMPARISON OF 1-HOUR AVERAGE OZONE CONCENTRATIONS (PPM)**

**SITE 247-037-0011 EAST HEALTH CENTER**

<b>YEAR</b>	<b>1985</b>	<b>1986</b>	<b>1987</b>	<b>1988</b>	<b>1989</b>	<b>1990</b>	<b>1991</b>	<b>1992</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Highest 1-Hr. Conc.	0.090	0.105	0.105	0.145	0.100	0.110	0.095	0.090	0.105	0.090	0.110	0.100	0.130	0.114	0.117	0.104	0.088	0.087	0.085	0.084	0.083	0.091	0.094	0.086
2nd Highest 1-Hr. Conc.	0.085	0.095	0.090	0.130	0.095	0.105	0.075	0.080	0.100	0.090	0.105	0.100	0.125	0.105	0.116	0.091	0.083	0.087	0.076	0.076	0.079	0.088	0.083	0.084
3rd Highest 1-Hr. Conc.	0.080	0.085	0.090	0.125	0.090	0.100	0.075	0.080	0.100	0.090	0.100	0.095	0.110	0.102	0.107	0.085	0.083	0.086	0.073	0.074	0.079	0.082	0.83	0.084
4th Highest 1-Hr. Conc.	0.080	0.080	0.090	0.120	0.085	0.095	0.070	0.075	0.090	0.090	0.100	0.095	0.110	0.101	0.101	0.084	0.079	0.085	0.073	0.073	0.079	0.080	.083	0.075
No. of 1-Hr. Exceedances	0	0	0	3	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0
No. of Days Std. Exceeded	0	0	0	3	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0

**SITE 247-037-0026 PERCY PRIEST DAM**

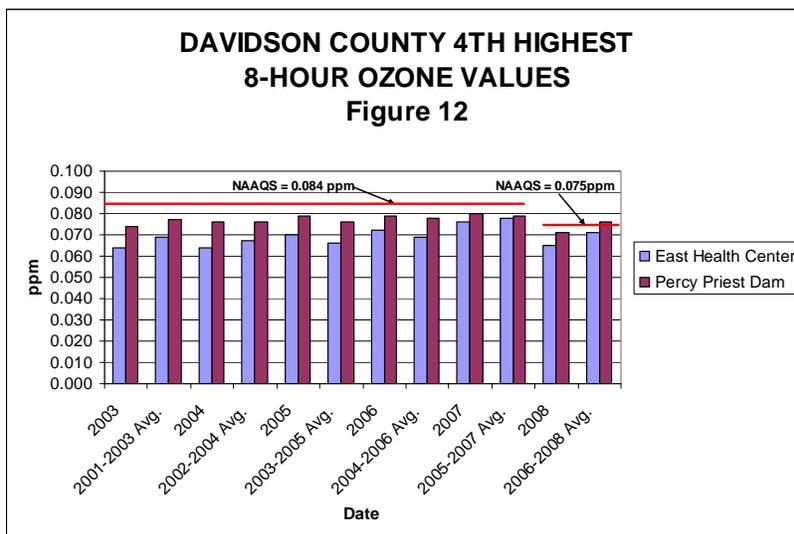
<b>YEAR</b>	<b>1985</b>	<b>1986</b>	<b>1987</b>	<b>1988</b>	<b>1989</b>	<b>1990</b>	<b>1991</b>	<b>1992</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Highest 1-Hr. Conc.	0.075	0.085	0.115	0.130	0.085	0.115	0.105	0.105	0.100	0.105	0.115	0.125	0.120	0.141	0.129	0.109	0.106	0.100	0.092	0.096	0.104	0.108	0.112	0.092
2 <sup>nd</sup> Highest 1-Hr. Conc.	0.075	0.085	0.095	0.130	0.080	0.100	0.095	0.095	0.090	0.095	0.110	0.110	0.100	0.120	0.123	0.106	0.100	0.097	0.091	0.091	0.101	0.103	0.094	0.084
3 <sup>rd</sup> Highest 1-Hr. Conc.	0.070	0.085	0.095	0.125	0.080	0.095	0.095	0.080	0.090	0.080	0.110	0.105	0.095	0.112	0.120	0.103	0.094	0.090	0.086	0.087	0.096	0.099	0.094	0.083
4 <sup>th</sup> Highest 1-Hr. Conc.	0.070	0.080	0.090	0.120	0.075	0.085	0.095	0.080	0.090	0.080	0.110	0.100	0.095	0.111	0.118	0.099	0.088	0.087	0.084	0.085	0.093	0.098	0.092	0.081
No. of 1-Hr. Exceedances	0	0	0	3	0	0	0	0	0	0	0	1	0	3	1	0	0	0	0	0	0	0	0	0
No. of Days Std. Exceeded	0	0	0	12	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0

TABLE XXII										
1999 – 2008 ANNUAL COMPARISON OF 8-HOUR AVERAGE OZONE CONCENTRATIONS (PPM)										
SITE 247-037-0011 EAST HEALTH CENTER										
YEAR	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Highest 8-hour average concentration	0.103	0.084	0.078	0.076	0.078	0.071	0.074	0.084	0.079	0.078
2 <sup>nd</sup> highest 8-hour average concentration	0.102	0.081	0.076	0.075	0.066	0.065	0.071	0.077	0.077	0.074
3 <sup>rd</sup> highest 8-hour average concentration	0.090	0.075	0.074	0.073	0.065	0.065	0.071	0.072	0.073	0.073
4 <sup>th</sup> highest 8-hour average concentration	0.088	0.072	0.070	0.073	0.064	0.064	0.070	0.072	0.072	0.065
No. of days 8-hour standard exceeded	9	0	0	0	0	0	0	0	0	1

SITE 247-037-0026 PERCY PRIEST DAM										
YEAR	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
Highest 8-hour average concentration	0.101	0.096	0.097	0.082	0.085	0.082	0.094	0.098	0.100	0.079
2 <sup>nd</sup> highest 8-hour average concentration	0.100	0.085	0.093	0.082	0.082	0.077	0.081	0.088	0.088	0.077
3 <sup>rd</sup> highest 8-hour average concentration	0.098	0.085	0.079	0.079	0.075	0.077	0.079	0.082	0.083	0.074
4 <sup>th</sup> highest 8-hour average concentration	0.098	0.084	0.079	0.079	0.074	0.076	0.079	0.079	0.079	0.071
No. of days 8-hour standard exceeded	15	3	2	0	1	0	1	2	2	2

The EPA adopted a new 8-hour NAAQS of 0.075 ppm for ozone in March, 2008. The data in Table XXII shows that there were three days during 2008 when the highest 8-hour average ozone concentration was greater than 0.075 ppm. Compliance with the new 8-hour average ozone NAAQS is achieved when the 3-year average of the annual fourth highest value is less than 0.075 ppm. The Davidson County 3-year average (2006, 2007 and 2008) at the Percy Priest Dam site is 0.079 ppm which exceeded the new 8-hour NAAQS during 2008. Davidson County did not monitor a violation of the 1997 8-hour ozone NAAQS since it was adopted in 1997.



The Middle Tennessee ozone nonattainment area, which includes Davidson, Sumner, Rutherford, Williamson, and Wilson Counties, was reclassified to attainment for the 1-hour ozone NAAQS on October 30, 1996. The area is currently operating under an existing 1-hour ozone maintenance plan. Designation for the Middle Tennessee area for the 1997 8-hour ozone standard occurred in April, 2004. The area was designated nonattainment for 8-hour ozone with the requirements being deferred as long as the Early Action Compact milestones are met. The Middle Tennessee EAC area met all milestones, and therefore received timely deferrals from EPA in order to remain in the EAC. On April 2, 2008 the Middle Tennessee, including Davidson County, was designated attainment for the 1997 ozone NAAQS.

Table XXIII shows the highest ozone values measured in the Middle Tennessee area during the 3-year period of 2006 through 2008. Compliance with the 1-hour standard is achieved by measuring less than one (1.0) exceedance per year averaged over the most recent three (3) year period. Compliance with the more stringent 2008 8-hour standard is achieved when the three year average of the annual fourth highest 8-hour ozone value is less than 0.075 ppm. Therefore, Davidson County is exceeding the new 2008 8-hour ozone NAAQS of 0.075 ppm adopted by the EPA in March 2008. Official non-attainment designation was originally to become effective in March, 2010. However, on September 16, 2009, EPA announced it will reconsider the 2008 Ozone NAAQS with final designations due August, 2011.

<b>TABLE XXIII</b>											
<b>2006 - 2008 SUMMARY OF THE HIGHEST 1-HOUR AVERAGE AND 8-HOUR AVERAGE OZONE CONCENTRATIONS IN THE MIDDLE TENNESSEE AREA</b>											
<b>SITE NUMBER &amp; LOCATION</b>	<b>YEAR</b>	<b>MAXIMUM CONCENTRATIONS</b>								<b>NO. OF DAYS &gt; STANDARD</b>	
		<b>1<sup>st</sup> 1-Hr.</b>	<b>1<sup>st</sup> 8-Hr.</b>	<b>2<sup>nd</sup> 1-Hr.</b>	<b>2<sup>nd</sup> 8-Hr.</b>	<b>3<sup>rd</sup> 1-Hr.</b>	<b>3<sup>rd</sup> 8-Hr.</b>	<b>4<sup>th</sup> 1-Hr.</b>	<b>4<sup>th</sup> 8-Hr.</b>	<b>1-Hr.</b>	<b>8-Hr.</b>
247-037-0011 East Health Center-Davidson	2006	0.091	0.084	0.088	0.077	0.082	0.072	0.080	0.072	0	0
	2007	0.094	0.079	0.083	0.077	0.083	0.077	0.083	0.076	0	0
	2008	0.086	0.078	0.084	0.074	0.084	0.073	0.075	0.065	0	1
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>Yes</b>
247-037-0026 Percy Priest Dam-Davidson	2006	0.108	0.098	0.103	0.088	0.099	0.082	0.098	0.079	0	2
	2007	0.112	0.100	0.094	0.088	0.094	0.083	0.092	0.080	0	2
	2008	0.092	0.079	0.077	0.077	0.083	0.074	0.081	0.071	0	2
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>No</b>
247-149-0101* Eagleville- Rutherford	2006	0.095	0.076	0.082	0.076	0.081	0.075	0.080	0.074	0	0
	2007	0.112	0.098	0.104	0.091	0.100	0.089	0.095	0.089	0	4
	2008	0.082	0.073	0.079	0.073	0.077	0.072	0.077	0.071	0	0
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>No</b>
247-165-0007* Old Hickory Dam-Sumner	2006	0.108	0.098	0.104	0.091	0.101	0.089	0.100	0.088	0	5
	2007	0.114	0.104	0.098	0.088	0.098	0.087	0.094	0.083	0	3
	2008	0.108	0.090	0.100	0.089	0.097	0.082	0.089	0.081	0	6
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>No</b>
247-165-0101* Cottontown- Sumner	2006	0.105	0.090	0.104	0.087	0.099	0.084	0.097	0.083	0	2
	2007	0.104	0.091	0.103	0.086	0.101	0.086	0.095	0.085	0	6
	2008	0.088	0.080	0.087	0.076	0.083	0.069	0.077	0.069	0	2
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>No</b>
247-187-0106* Fairview- Williamson	2006	0.097	0.085	0.084	0.075	0.082	0.073	0.082	0.072	0	1
	2007	0.109	0.089	0.097	0.088	0.095	0.087	0.093	0.085	0	4
	2008	0.087	0.078	0.083	0.076	0.083	0.072	0.078	0.069	0	2
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>Yes</b>
247-189-0103* Cedars of Lebanon-Wilson	2006	0.095	0.086	0.094	0.083	0.094	0.081	0.091	0.080	0	1
	2007	0.098	0.093	0.097	0.091	0.096	0.086	0.095	0.085	0	3
	2008	0.093	0.081	0.091	0.079	0.090	0.076	0.089	0.076	0	4
<b>COMPLIANCE WITH NAAQS</b>										<b>Yes</b>	<b>No</b>

\*OPERATED BY THE STATE OF TENNESSEE--DIVISION OF AIR POLLUTION CONTROL

## CARBON MONOXIDE

Carbon monoxide is a colorless, odorless gas that is a product of incomplete combustion. The major source of carbon monoxide is the internal combustion engine, particularly the automobile. Carbon monoxide enters the bloodstream and reduces oxygen delivery to the body's organs and tissues. The method used for measuring carbon monoxide is a non-dispersive infrared method. During 2008, carbon monoxide was measured at Hume Fogg Magnet School (site 0021). The Donelson Library site (site 0028) was taken out of service at the end of 2002 and the Douglas Park site (site 0031) was taken out April 30, 2007 with EPA concurrence due to continuing compliance with the carbon monoxide NAAQS. Tables XXIV through XXVI present a summary of the carbon monoxide data for 2008. This data shows that the National Ambient Air Quality Standard was not violated at any site during 2008.

**TABLE XXIV  
2008 CARBON MONOXIDE (PPM), SITE 247-037-0021, HUME FOGG MAGNET SCHOOL**

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANNUAL
No. of Observations	741	692	739	716	742	718	742	742	716	739	718	742	8747
Highest 1-Hr Conc.	1.7	2.4	1.9	1.6	1.3	2.2	1.4	1.2	1.2	2.6	3.2	2.4	3.2
Date of Highest Conc.	1/28	2/02	3/12	4/15	5/06	6/12	7/19	8/27	9/18	10/31	11/05	12/12	11/05
2nd Highest 1-Hr Cond.	1.6	2.0	1.4	1.6	1.3	2.1	1.3	1.1	1.2	2.0	3.2	2.0	3.2
Date of 2 <sup>nd</sup> Highest 1-Hr Conc.	1/27	2/03	3/12	4/17	5/06	6/12	7/29	8/28	9/18	10/05	11/05	12/30	11/05
No. of 1-Hr Exceedances	0	0	0	0	0	0	0	0	0	0	0	0	0
Highest 8-Hr Conc.	1.3	1.4	1.0	1.3	1.1	1.3	0.8	0.8	0.9	1.5	2.4	1.5	2.4
Date of Highest 8-Hr Conc.	1/28	2/03	3/12	4/16	5/06	6/12	7/19	8/27	9/29	10/30	11/06	12/30	11/06
2nd Highest 8-Hr Conc.	1.2	0.8	0.9	1.1	0.9	1.1	0.8	0.8	0.8	1.4	2.3	1.4	2.3
Date of 2 <sup>nd</sup> Highest 8-Hr Conc.	1/03	2/02	3/28	4/23	5/09	6/20	7/20	8/28	9/18	10/05	11/05	12/13	11/05
No. of 8-Hr Exceedance	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 8-Hr Concentration													
0 - 4.9	744	696	744	720	744	720	744	744	720	744	720	744	8784
5.0 - 8.9	0	0	0	0	0	0	0	0	0	0	0	0	0
9.0 - 12.9	0	0	0	0	0	0	0	0	0	0	0	0	0
13.0 - 16.9	0	0	0	0	0	0	0	0	0	0	0	0	0



**TABLE XXVII**  
**1982 - 2002 ANNUAL COMPARISON OF CARBON MONOXIDE CONCENTRATIONS, (PPM)**

**SITE 247-037-0028 DONELSON LIBRARY\***

<b>YEAR</b>	<b>1982</b>	<b>1983</b>	<b>1984</b>	<b>1985</b>	<b>1986</b>	<b>1987</b>	<b>1988</b>	<b>1989</b>	<b>1990</b>	<b>1991</b>	<b>1992</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>
Highest 1-Hr Conc.	10.0	13.5	8.0	8.5	8.5	8.0	7.0	11.5	8.5	8.0	8.0	7.0	6.0	3.5	5.0	4.0	3.6	4.1	3.5	3.9	2.7
2nd Highest 1-Hr Conc.	9.5	8.0	7.5	7.0	6.5	8.0	7.0	7.0	7.5	6.5	7.0	6.8	5.5	3.0	4.5	4.0	3.4	4.0	3.4	3.5	2.6
Highest 8-Hr Conc.	6.1	9.5	6.6	4.1	6.3	4.4	6.1	5.6	5.6	5.5	4.4	5.8	4.1	2.8	2.7	2.9	3.1	3.6	3.0	2.8	2.2
2nd Highest 8-Hr Conc.	5.9	4.9	6.2	3.8	5.8	4.1	4.5	5.6	4.3	3.4	4.4	5.4	3.1	2.4	2.5	2.8	2.8	2.6	2.4	2.7	1.8
No. of 1-Hr Exceedances of the Standard (35PPM)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 8-Hr Exceedances of the Standard (9PPM)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of Days 8-Hr. Standard Exceeded (Standard = 9PPM)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

\*Donelson Library site was taken out of service in 2002.

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**TABLE XXVIII**  
**1987 - 2007 ANNUAL COMPARISON OF CARBON MONOXIDE CONCENTRATIONS, (PPM)**

**SITE 247-037-0031 DOUGLAS PARK\***

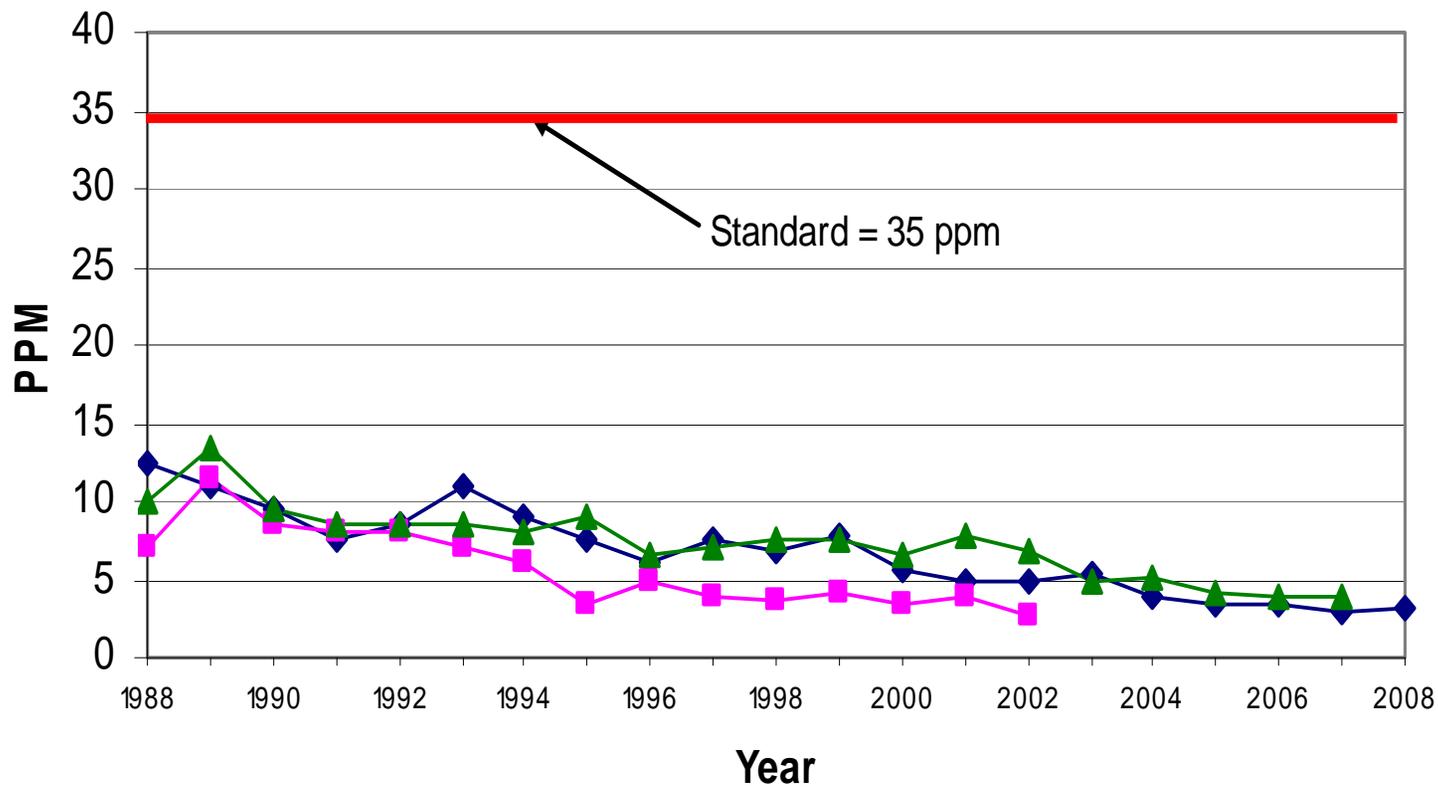
<b>YEAR</b>	<b>1987</b>	<b>1988</b>	<b>1989</b>	<b>1990</b>	<b>1991</b>	<b>1992</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Highest 1-Hr Concentration	10.0	10.0	13.5	9.5	8.5	8.5	8.5	8.0	9.0	6.5	7.0	7.5	7.5	6.7	7.7	6.9	4.9	5.1	4.2	3.9	3.9
2nd Highest 1-Hr Concentration	9.0	9.5	12.5	9.0	8.5	8.0	8.5	8.0	8.5	6.0	7.0	7.2	7.2	6.7	7.1	6.2	4.9	5.1	4.1	3.7	3.7
Highest 8-Hr Concentration	8.9	8.3	12.1	8.4	7.6	6.8	7.4	7.1	7.6	5.8	6.4	7.0	5.6	6.4	6.6	5.3	4.2	4.2	3.4	3.1	2.2
2nd Highest 8-Hr Concentration	8.1	7.0	8.3	7.7	6.2	6.4	7.3	7.1	7.3	5.0	6.3	6.1	5.3	5.6	5.7	5.0	3.6	3.8	3.2	3.1	1.9
No. of 1-Hr Exceedances of the Standard (35PPM)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 8-Hr Exceedances of the Standard (9PPM)	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of Days 8-Hr. Standard Exceeded (Standard=9PPM)	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

\*Douglas Park site was taken out of service in 2007.

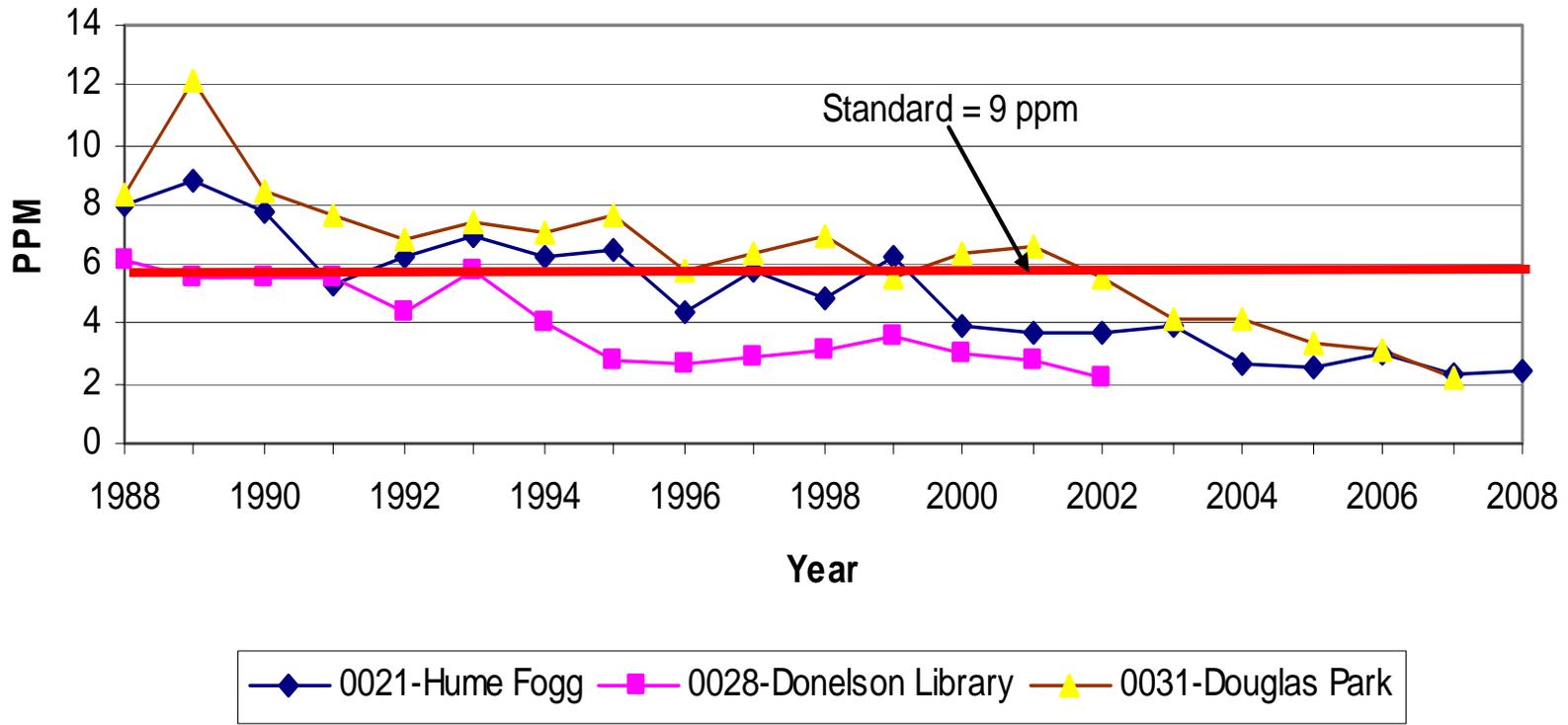
# ANNUAL COMPARISON CARBON MONOXIDE CONCENTRATIONS (PPM)

## Highest 1-Hour Concentrations

Figure 13



# ANNUAL COMPARISON OF CARBON MONOXIDE CONCENTRATIONS (PPM) Highest 8-Hour Average Concentrations Figure 14



## AIR QUALITY INDEX

The Air Quality Index (AQI) is a tool for reporting daily air quality. It tells you how clean or polluted your air is, and what associated health effects might be a concern for you. The AQI focuses on health effects you may experience within a few hours or days after breathing polluted air.

The AQI for Nashville and Davidson County, Tennessee is reported by the Metro Public Health Department, Air Pollution Control Division. The reported AQI is the maximum value for the previous day from midnight to midnight. It incorporates the measured concentrations of five pollutants: carbon monoxide, ozone, sulfur dioxide, PM<sub>2.5</sub> and PM<sub>10</sub>. For each of these pollutants, EPA has established national ambient air quality standards to protect public health. Ground-level ozone and airborne particles are the two criteria pollutants that pose the greatest threat to human health in this country.

The AQI is updated daily, Monday through Friday, at approximately 9:00 A.M. A daily recorded update of the AQI can be obtained by calling (615) 340-0488 and on the Metro Public Health Department's website which can be found at <http://health.nashville.gov>. Table XXX summarizes the daily AQI for 2006.

Think of the AQI as a yardstick that runs from 0 to 500. The higher the AQI value the greater the level of air pollution and the greater the health concern. For example, an AQI value of 50 represents good air quality with little potential to affect public health, while an AQI value over 300 represents hazardous air quality.

An AQI value of 100 generally corresponds to the national ambient air quality standard for the pollutant, which is the level EPA has set to protect public health. AQI values below 100 are generally thought of as satisfactory. When AQI values are above 100, air quality is considered to be unhealthy - at first for certain sensitive groups of people, then for everyone as AQI values get higher.

The purpose of the AQI is to help you understand what local air quality means to your health. To make it easier to understand, the AQI is divided into six categories:

Air Quality Index (AQI) Values	Levels of Health Concern	Colors
<i>When the AQI is in this range:</i>	<i>...air quality conditions are:</i>	<i>...as symbolized by this color:</i>
0 to 50	Good	Green
51 to 100	Moderate	Yellow
101 to 150	Unhealthy for Sensitive Groups	Orange
151 to 200	Unhealthy	Red
201 to 300	Very Unhealthy	Purple
301 to 500	Hazardous	Maroon

Each category corresponds to a different level of health concern. The six levels of health concern and what they mean are:

- **"Good"** The AQI value for your community is between 0 and 50. Air quality is considered satisfactory, and air pollution poses little or no risk.
- **"Moderate"** The AQI for your community is between 51 and 100. Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people. For example, people who are unusually sensitive to ozone may experience respiratory symptoms.
- **"Unhealthy for Sensitive Groups"** When AQI values are between 101 and 150, members of sensitive groups may experience health effects. This means they are likely to be affected at lower levels than the general public. For example, people with lung disease are at greater risk from exposure to ozone, while people with either lung disease or heart disease are at greater risk from exposure to particle pollution. The general public is not likely to be affected when the AQI is in this range.
- **"Unhealthy"** Everyone may begin to experience health effects when AQI values are between 151 and 200. Members of sensitive groups may experience more serious health effects.
- **"Very Unhealthy"** AQI values between 201 and 300 trigger a health alert, meaning everyone may experience more serious health effects.
- **"Hazardous"** AQI values over 300 trigger health warnings of emergency conditions. The entire population is more likely to be affected.

EPA has assigned a specific color to each AQI category to make it easier for people to understand quickly whether air pollution is reaching unhealthy levels in their communities. For example, green means good, yellow means moderate, orange means "unhealthy for sensitive groups," while red means that conditions may be "unhealthy for everyone," and so on.

Air Quality Index Levels of Health Concern	Numerical Value	Meaning
Good	0-50	Air quality is considered satisfactory, and air pollution poses little or no risk.
Moderate	51-100	Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution.
Unhealthy for Sensitive Groups	101-150	Members of sensitive groups may experience health effects. The general public is not likely to be affected.
Unhealthy	151-200	Everyone may begin to experience health effects; members of sensitive groups may experience more serious health effects.
Very Unhealthy	201-300	Health alert: everyone may experience more serious health effects.
Hazardous	> 300	Health warnings of emergency conditions. The entire population is more likely to be affected.

<b>TABLE XXIX 2008 AQI SUMMARY</b>		
<b>Range</b>	<b>Number of Days</b>	<b>% of Total Days</b>
Good	236	64%
Moderate	127	35%
Unhealthy for Sensitive Groups	3	1%

The PCD has established a performance goal (Air Quality Key Results Measure) of Nashville's air being in the good or moderate range according to EPA's AQI on 95% of the days of the year. The calculation method simply involves counting the number of days during a calendar year that the air quality in Nashville is in the good or moderate range and then dividing that total by 365. Based on the 2008 data, Nashville's air was in the good or moderate range on 99.2% of the days according to EPA's AQI. Therefore, the PCD achieved its performance goal in 2008.

The Davidson County maximum AQI in 2008 was on August 4, 2008 when the 8-hour ozone concentration reached 0.079 ppm at the Percy Priest Dam monitoring site. The 0.079 ppm concentration resulted in a reported AQI of 109. Hot temperatures along with sunny skies and stagnant conditions persisted across the nation causing elevated ground level ozone concentrations during this time period.

### **AIR QUALITY FORECASTING**

In cooperation with the Tennessee Department of Environment and Conservation, Air Pollution Control Division, the PCD participates in the issuance of a daily air quality forecast. This forecast is issued to alert the Middle Tennessee area of the probable maximum ozone and particulate matter (PM<sub>2.5</sub>) concentration on the next day. An Air Quality Action Day is called when the predicted ozone or PM<sub>2.5</sub> air quality for the next day is forecast to be in the unhealthy for sensitive groups (or higher) category. The intent is to notify those people that might be affected by the next day's air quality so that they have the opportunity to make adjustments to minimize their exposure to ozone and particulate matter (PM<sub>2.5</sub>) air pollution. It also provides the opportunity for area residents and businesses to alter their activities to minimize their impact on air quality in the Middle Tennessee area.

The PCD is an active member of the regional Clean Air Partnership (CAP) of Middle Tennessee. The CAP directs the Air Quality Action Day program. This program continues to develop, promoting the use of local air quality forecasts to induce voluntary behavior changes that improve air quality and protect the health of sensitive individuals.

Progress to date includes continued relationships with weather staff at each of the local TV news stations, continued relationships with local newspaper environmental and transportation reporters, development and continued support of the CAP of Middle Tennessee's [www.cleanairpartnership.info](http://www.cleanairpartnership.info) website and quarterly newsletter, multi-media outreach campaign including billboards, radio, television, and newspaper advertising, participation in the Nashville Earth Day Festival and several other community events from 2003 through 2008, several radio interviews, on-camera interviews aired on local TV news programs on Air Quality Action Days in 2005-2008, and formal launch of the CAP Employer Partner Program. Planned activities include promoting air quality curriculum materials for use in area public and private schools, development of an anti-idling program, increasing the number of businesses participating in the CAP Employer Partner Program to 20 during 2009, partnering with area schools and businesses interested in developing air quality projects as part of the Tennessee Pollution Prevention Partnership program, and contributing to the AirShare Television series produced by the Clean Air Partnership of Williamson County.

The daily air quality forecast is made available to the public by the PCD by calling (615) 340-0488 and on the Metro Public Health Department's website which can be found at <http://health.nashville.gov>. It is also available on the Clean Air Partnership web site ([www.cleanairpartnership.info](http://www.cleanairpartnership.info)), in the Tennessean, and during the local television weather broadcasts. Individuals also may sign up to receive the air quality forecasts or alerts only via the EnviroFlash link on the Clean Air Partnership web site.

Pollen is a small, spherical shaped grain which is produced by plants and is necessary for plant fertilization. Each plant has its own pollinating season which tends to be fairly constant from year to year. In this region, trees generally pollinate from around the first of March through May, grass from the first of March until killing frost and ragweed in the fall. The actual amount of pollen in the air, at any given time, depends on the weather conditions, as well as total amount of pollen produced.

Pollen is measured using a Durham pollen sampler. Pollen is collected on a microscope slide which has been smeared with a light coating of white petroleum jelly or silicone grease. The slide is exposed for 24 hours and then returned to the laboratory where it is stained with a few drops of Calberia's staining solution. The pollen on the slide is read with a microscope on low power (10X). Five scans across the stained area are counted, and the pollen count is computed as the number of grains of pollen per square centimeter. The following is used for the pollen count:

0 to 5 Pollen Grains/cm <sup>2</sup>	Slight
6 to 15 Pollen Grains/cm <sup>2</sup>	Moderate
16 to 25 Pollen Grains/cm <sup>2</sup>	Heavy
Greater than 25 Pollen Grains/cm <sup>2</sup>	Extremely Heavy

<b>TABLE XXX</b>		
<b>2008 POLLEN COUNT SUMMARY</b>		
<b>Range</b>	<b>Number of Days</b>	<b>% of Total Days</b>
Slight	63	37%
Moderate	45	26%
Heavy	15	9%
Extremely Heavy	48	28%

Table XXXI gives a summary of the 2008 pollen season. The maximum daily pollen count for Nashville during 2008 was 1353 grains/cm<sup>2</sup> measured April 10, 2008 due to the combination of cedar, maple, oak and pine.

A daily update of the Pollen Count can be found on the website at <http://health.nashville.gov> or by calling the recorded message at (615) 340-0488.

According to comparative risk studies performed by EPA and its Science Advisory Board, indoor air pollution has been ranked among the top five environmental risks to public health. Children may be especially vulnerable to these health effects. EPA estimates that indoor levels of many pollutants are typically 2-5 times, and occasionally more than 100 times, higher than outdoor levels. These levels are of particular concern because it is estimated that most people spend 90% of their time indoors.

The Pollution Control Division is presently operating an Indoor Air Quality (IAQ) program at the Metro Public Health Department. Currently, there are no regulations directly addressing non-occupational indoor air quality. This is a voluntary program that seeks to provide information, diagnostic services (when possible) and suggestions in hopes of increasing the public's knowledge of IAQ and decrease the health effects associated with poor indoor air quality. The IAQ program provides support and expertise to address the indoor air quality concerns of residences (homes, apartments, etc.), schools, childcare facilities, and public facilities. For indoor air quality issues relating to the workplace, the Tennessee Occupational Safety and Health Administration (TOSHA) is responsible for the health and safety of employees at commercial and industrial establishments.

During 2008, more than 32 on-site indoor air quality investigations were conducted in residences, schools, childcare facilities and public buildings. There were many more telephone calls from the community seeking information and guidance on how to correct a particular situation or how to improve their indoor air quality. Complaints and requests for assistance have been received from homeowners, renters, students, parents and staff at public and private schools, church members, parents and staff at daycare centers and employees and employers at commercial and industrial facilities.

Recently, there has been growing concern over mold in the indoor environment. News stories have focused on numerous health concerns reportedly caused by exposure to mold. The most common (documented) symptom is an allergic reaction. At this time, there is still much to learn about what other health effects can actually be directly related to mold exposure. Since there are no regulatory limits for mold in the home or work environment, the best advice is as follows: If you suspect you have a mold problem, look for a source of moisture. Moisture control is the key to mold control. Microbials need a source of moisture and a source of food to grow and multiply. Before successful remediation can take place, the source of moisture must be eliminated or the problem can reoccur. In most cases, mold can be removed from surfaces with soap and water and the surfaces sanitized with a weak bleach solution. Once mold begins to grow in insulation or wallboard the only way to deal with the problem is by removal and replacement. If you have an extensive amount of mold and believe you can not manage the cleanup on your own, you may want to contact a professional who has experience in remediation of mold in homes and other buildings.

There are many other sources of indoor air pollution that may be present in the home. Combustion sources such as [oil](#), [gas](#), [kerosene](#), [coal](#), [wood](#), and [tobacco products](#) can produce pollutants such as carbon monoxide, nitrogen dioxide, and particulates. Organic chemicals are widely used as ingredients in many household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing, and hobby products. All these products can release volatile organic compounds while being used. Biological contaminants such as mold and mildew, dust mites, pet dander and cockroaches can trigger asthma and allergic reactions. By monitoring the relative humidity, increasing ventilation, and routinely cleaning the home, contact with many biological contaminants can be reduced.

Indoor pollution sources that release gases or particles into the air are the primary cause of indoor air quality problems in homes. Inadequate ventilation can increase indoor pollutant levels by not bringing in enough outdoor air to dilute emissions from indoor sources and by not carrying indoor air pollutants out of the home. High temperature and humidity levels can also increase concentrations of some pollutants. Controlling these aspects of the indoor environment will help decrease exposure to most indoor air pollutants.

## **8. VEHICLE INSPECTION PROGRAM**

The Federal Clean Air Act as amended mandates a Vehicle Inspection Program in non-attainment areas unable to demonstrate attainment of the National Ambient Air Quality Standard (NAAQS) for carbon monoxide and

ozone by December 31, 1982. Davidson County was unable to demonstrate attainment by December 31, 1982. Therefore, a 5-year extension was requested to demonstrate attainment of the NAAQS for carbon monoxide and ozone. The basis for the requested extension was a commitment to implement a mandatory vehicle emissions testing program. The Vehicle Inspection Program began the mandatory testing of light duty gasoline motor vehicles in 1985. Failure to implement this mandatory vehicle inspection program could have resulted in sanctions including federal highway funds, air program funds and a construction moratorium.

Carbon monoxide (CO) is a colorless, odorless gas that is a product of incomplete combustion. The major source of carbon monoxide in Davidson County is light duty vehicles. Ozone (O<sub>3</sub>) is a colorless, pungent gas that is produced by the reaction of sunlight with volatile organic compounds and nitrogen oxides. A major source of volatile organic compounds and nitrogen oxides in Davidson County is light duty vehicles.

This section describes the results of Davidson County's Vehicle Inspection Program for the period of January 1, 2008 through December 31, 2008.

### **VEHICLE INSPECTION PROGRAM DESCRIPTION**

The Metropolitan Code of Nashville and Davidson County, Chapter 10.56, "Air Pollution Control," Section 10.56.240, "Internal Combustion Engines," authorizes the Metropolitan Board of Health to develop and implement a vehicle inspection maintenance program. On May 31, 1981, the Metropolitan Board of Health adopted the Metro Public Health Department, Division of Pollution Control's, Regulation No. 8, "Regulation of Emissions From Light-Duty Motor Vehicles Through Mandatory Vehicle Inspection and Maintenance Program," which provides for a vehicle inspection program for all light duty vehicles manufactured from 1975 through current model year with a maximum gross vehicle weight of 8,500 pounds or less. The only exceptions were diesel or electric powered light duty vehicles and motorcycles. This regulation was approved by the Metropolitan Council of Nashville and Davidson County May 17, 1983, Resolution No. R83-1471. The program approved by the Metropolitan Council is a centralized program operated by a contractor.

The Vehicle Inspection Program became mandatory January 1, 1985. Before the owner of a light duty vehicle can purchase the Davidson County wheel tax license, they must show proof that the vehicle has met the allowable tailpipe emission standards of the Vehicle Inspection Program.

Effective December 1, 1994, the program was changed to require all 1975 and newer, to undergo a visual three-point anti-tampering inspection. This includes the gas cap, gasoline inlet restrictor and catalytic converter.

In August, 2001, the Metropolitan Council adopted Resolution No. RS 2001-716 to allow all 1996 and newer vehicles to receive an OBD test for emissions compliance. The OBD testing started April 1, 2002.

On April 1, 2005, the Vehicle Inspection Program changed the test weight of vehicles from 8,500 pounds Gross Vehicle Weight Rate (GVWR) to include vehicles up to 10,500 pounds GVWR. The program also added diesel powered vehicles.

The Nashville Vehicle Inspection Program requires all light duty gasoline and diesel powered vehicles with a GVWR of 10,500 pounds or less to be inspected annually. Vehicles found to have excessive emissions must be repaired, retested and pass the emissions test prior to being issued a Davidson County wheel tax license.

The Nashville Vehicle Inspection Program uses idle, on-board diagnostic (OBD) and curb idle (opacity) test procedures. Light duty gasoline vehicles 1975 – 1995 are tested using the idle test. Light duty diesel vehicles 1975 – 2001 are tested using the curb idle (opacity) test. Light duty gasoline vehicles 1996 and newer, and light duty diesel vehicles 2002 and newer, are tested using the OBD test.

The 1975 - 1995 light duty gasoline vehicles are tested at idle RPM with the transmission in neutral or park. If the vehicle fails to pass this test, a high RPM precondition is used, and the vehicle is given a second idle test.

A vehicle does not fail the initial test unless it fails both idle tests. The allowable emission standards for various vehicle types and ages are listed in Table XXXI.

The OBD test consists of two types of examinations. There is a visual check of the dashboard check engine light (malfunction indicator light or mil) and an electronic examination of the OBD computer. The vehicle analyzer is plugged into the data link connector (DLC) on the vehicle, and the stored information from the vehicle's on-board computer is downloaded to the analyzer.

The curb idle (opacity) test measures the density of the exhaust from light duty diesel vehicles. The opacity is compared to the 10% standard, and pass-fail is determined.

<b>Table XXXI Idle Speed Maximum Allowable Emissions During Idle Speed (Tailpipe) Test</b>				
Vehicle Model Year	<b>Carbon Monoxide %</b>		<b>Hydrocarbon (PPM)</b>	
	LIGHT DUTY VEHICLES LESS THAN OR EQUAL TO 6000 LBS. GVWR	LIGHT DUTY VEHICLES GREATER THAN 6000 LBS. GVWR	LIGHT DUTY VEHICLES LESS THAN OR EQUAL TO 6000 LBS. GVWR	LIGHT DUTY VEHICLES GREATER THAN 6000 LBS. GVWR
1975	5.0	6.5	500	750
1976	5.0	6.5	500	750
1977	5.0	6.5	500	750
1978	4.0	6.0	400	600
1979	4.0	6.0	400	600
1980	3.0	4.5	300	400
1981 & Newer	1.2	4.0	220	400

### **VEHICLE INSPECTION PROGRAM OPERATING STATISTICS**

During 2008, the Nashville Vehicle Inspection Program performed 584,572 emission inspections. Compared to the 590,930 inspections done during 2007, there was a decrease of 6,358 inspections.

### **VEHICLE INSPECTION PASS AND FAIL RATES**

In 2008, a total of 522,466 vehicles were inspected. The 2008 initial test pass rate was 90.5%, and the initial test fail rate was 8.5%. The initial inspection fail rates rounded to the nearest percent by year since the program start-up can be found in Table XXXII.

**TABLE XXXII  
INITIAL EMISSION INSPECTION FAIL RATE**

YEAR	FAIL RATE
1986	18%
1987	16%
1988	14%
1989	12%
1990	11%
1991	9%
1992	7%
1993	7%
1994	7%
1995	10%
1996	9%
1997	8%
1998	8%
1999	7%
2000	6%
2001	6%
2002	10%
2003	11%
2004	10%
2005	9%
2006	9%
2007	9%
2008	9%

The most reasonable explanation for the decreasing fail rates from 1986 - 1994 is that affected vehicles are being better maintained and many gross polluters have been taken out of service. Encouraging motorists to maintain their vehicles is an essential goal of the program.

Also, note that the fail rate went up beginning in 1995 after years of decline. This is due to the adding of a three-point anti-tampering inspection into the program in 1995. Again, the increase in the 2002 and later vehicle fail rate was due to the addition of OBD testing on 1996 and newer vehicles.

This data shows that the Nashville Vehicle Inspection Program is effective in reducing light duty gasoline and diesel vehicle emissions from the test fleet.

### VEHICLE INSPECTION PROGRAM QUALITY ASSURANCE

The Metro Public Health Department Vehicle Inspection Staff is also assigned the duty of auditing all emission inspection facilities in the Davidson County program. The program has six test centers as seen in Table XXXIII.

<b>TABLE XXXIII TEST CENTER LOCATIONS DAVIDSON COUNTY</b>	
Station 1	501 Craighead Street
Station 2	3494 Dickerson Road
Station 3	715 Gallatin Road North, Madison
Station 4	3363 Stoners Bend Drive
Station 5	1317 Antioch Pike
Station 6	7008 West Belt Drive

The audit involves review of inspection facility records and compliance with administrative requirements and tests of emission inspection equipment to ensure that the equipment is operating in accordance with all federal and local requirements. Audits are conducted twice a month on all inspection facilities. Gas analyzer audits involve tests to ensure that the gas analyzers are measuring criterion gases (i.e., hydrocarbons, carbon monoxide and carbon dioxide) accurately. During 2008, there were 871 gas analyzer audits on 42 gas analyzers used by the test centers. Also, there were 140 covert activities conducted on contractor inspection facilities.

#### **VEHICLE INSPECTION PROGRAM ENFORCEMENT**

During 2008, various enforcement activities were carried out to ensure compliance with the vehicle inspection program. The staff issued 210 Notices of Violation or Citations.

Due to the enforcement efforts of the staff, the Nashville Vehicle Inspection Program has a 98% compliance rate. The compliance rate of a vehicle inspection program is the percentage of vehicles in a fleet that ultimately receives a certificate of compliance after testing and any needed repair. Overall, the data shows that the Nashville Vehicle Inspection Program is effective in reducing emissions from light duty vehicles, since the dirty vehicles are being identified and repaired.

#### **9. OTHER POLLUTION CONTROL DIVISION ACTIVITIES**

During 2008, the staff attended 90 EPA workshops or training courses. Semi-annually in 2008, the State of Tennessee Visible Emission Evaluation School certified three environmentalists, two engineers and one program coordinator to conduct visible emissions evaluations. The staff made three presentations.

In addition to the ambient monitoring activities previously presented, the Pollution Control Division Laboratory performed analysis on 28 samples for asbestos and 1 particulate matter sample.

During 2008, this agency's revenue included:

\$ 680,220	Operating Permits and Emission-based fees
\$ 12,356	Penalties
\$ 105	Fines
\$1,886,753	Vehicle Inspection Program