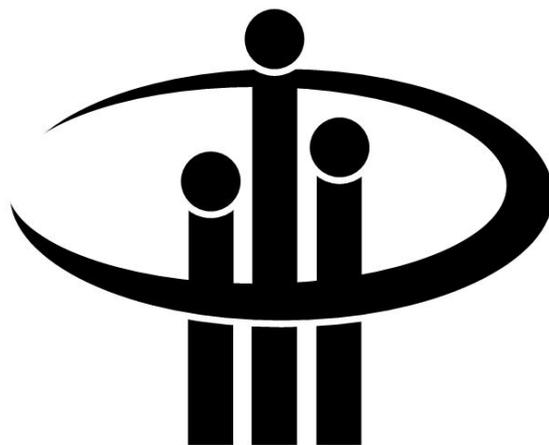


**POLLUTION CONTROL
DIVISION**

**ANNUAL REPORT
2016**



Metro* Public Health *Dept

Nashville / Davidson County

Promoting and Protecting Health

**Mayor of Metropolitan Government of
Nashville & Davidson County
The Honorable David Briley**

Metropolitan Board of Health

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**The mission of the Metro Public Health Department is to protect,
improve, and sustain the health and well-being of all people in
Metropolitan Nashville.**

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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 2016.

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 2016 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 approximately 75.0% of the total 2016 particulate (PM₁₀) emissions, and that on-road mobile source emissions account for approximately 7.1% of the total 2016 PM₁₀ emissions. Figure 2 shows that industrial processes account for approximately 41.1% of the total 2016 sulfur dioxide emissions, while on-road and non-road mobile sources account for approximately 45.0% of the total 2016 sulfur dioxide emissions. Figure 3 shows that the on-road and non-road mobile source emissions account for approximately 86.7% of the total 2016 nitrogen dioxide emissions. Figure 4 shows that approximately 96.7% of the 2016 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 45.7% of the total 2016 volatile organic compound emissions, and approximately 26.1% 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 period from 2004 through 2016. The large increase in nitrogen dioxide emissions seen between 2006 and 2007 is a result of the switch from using the MOBILE6.2 model to MOVES2010 to calculate on-road mobile source emissions. Originally, the emissions for 2006 through 2009 were calculated using MOBILE6.2. However, the emissions were recalculated using the MOVES model in order to provide a better sense of the trend of the emissions data. The MOVES model calculates significantly higher nitrogen dioxide emissions than MOBILE6.2, given the same input data.

The 2016 Davidson County Hazardous Air Pollutant Emission Inventory is shown in Table III.

During 2016, the Engineering Section reviewed plans and specifications for 129 new and/or modified stationary sources and issued the following permits:

Construction Permits:	122
Operating Permits:	696

In addition to the above permits, 289 permits were issued for asbestos removal. Revenue generated from the issuance of permits in 2016 was \$351,382.

During 2016 this agency observed the following compliance source tests:

1	Nitrogen Oxides
47	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 two facilities have expanded production to become major sources while several facilities have closed. The following facilities currently maintain Part 70 Operating Permits:

Permit Number	Facility Name
70-0025	Gaylord Opryland Resort and Convention Center
70-0039	Vanderbilt University
70-0040	Carlex Glass America, LLC
70-0042	Vought Aircraft Industries, Inc.
70-0050	Metro District Energy System
70-0156	Gibson Guitar
70-0196	Fiberweb, Inc.
70-0241	Vanderbilt University Medical Center

4. EMISSION INVENTORY

TABLE I
2016 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
TRANS. & MKT. OF VOC										
VOL Storage & Handling	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	17.4	13.5
Bulk Gasoline Terminals	0.0	0.0	0.0	0.0	11.9	0.0	30.6	0.0	0.0	315.8
Bulk Gasoline Plants	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.8	0.0
Tank Truck Unloading (Stage I)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	223.1	0.0
Tank Trucks In Transit	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	60.5	0.0
Subtotal	0.1	0.0	0.0	0.0	12.0	0.0	30.6	0.0	304.8	329.4
Total--Area + Point	0.1		0.0		12.0		30.6		634.2	
INDUSTRIAL PROCESSES										
Adhesives	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Aerospace	0.7	0.0	0.0	0.0	3.5	0.0	2.9	0.0	18.5	12.8
Misc. Metal Products	4.7	0.0	0.1	0.0	21.9	0.0	18.4	0.0	23.7	23.6
Inorganic Chemical Mfg.	0.0	33.0	0.0	0.0	4.6	0.0	3.7	0.0	1.9	0.0
Organic Chemical Mfg.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Textile Mfg.	4.2	63.1	0.1	0.0	8.9	0.0	7.4	0.0	10.9	0.0
Rubber Tire Mfg.	2.1	0.0	0.0	0.0	0.1	0.0	0.1	0.0	3.3	0.0
Plastic Products Mfg.	1.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.9	0.0
Wood Products Mfg.	7.4	0.0	0.8	0.0	12.7	0.0	2.7	0.0	25.7	179.9
Clay & Glass	5.3	100.3	0.0	135.6	0.0	799.9	23.0	0.0	0.0	39.4
Mineral Products	75.2	47.2	1.3	0.0	21.3	0.0	4.4	0.0	0.9	0.0
Asphalt Plants	26.4	0.0	25.4	0.0	11.2	0.0	65.7	29.7	22.9	0.0
Paint Mfg.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	13.3	0.0
Food & Agriculture	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.3	28.1
Primary/Sec. Metals	6.4	11.2	0.0	0.0	4.7	0.0	4.0	0.0	1.3	0.0
Large Appliance Coating	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Paint and Body Shops	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.0	0.0
Subtotal	142.7	254.8	27.8	135.6	88.8	799.9	132.3	29.7	158.6	283.9
Total--Area + Point	397.6		163.4		888.7		162.0		442.5	

TABLE I (continued)
2016 Davidson County Annual Emission Inventory

STATIONARY SOURCES-TONS PER YEAR (continued)										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
NON-IND. SURFACE COAT.										
Architectural	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,196.2	0.0
Auto Refinishing	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	86.6	0.0
Traffic Markings	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	145.1	0.0
Subtotal	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,437.6	0.0
Total--Area + Point	0.0		0.0		0.0		0.0		1,437.6	
OTHER SOLVENT USE										
Cold Cleaners (exc. perc)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1,471.5	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	0.7	0.0	0.0	0.0	8.8	0.0	7.0	0.0	46.8	137.8
Dry Cleaning (exc. perc)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.9	0.0
Cons./Comm. Solv. Use	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2,073.8	0.0
Subtotal	0.7	0.0	0.0	0.0	8.8	0.0	7.0	0.0	3,593.9	137.8
Total--Area + Point	0.7		0.0		8.8		7.0		3,731.8	
MISC. SOURCES										
Pesticide Application	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	609.1	0.0
Landfills	0.4	0.0	0.0	0.0	1.1	0.0	19.6	0.0	0.8	0.0
Scrap & Waste Material	19.2	27.2	3.9	0.0	23.7	0.0	2.5	0.0	0.3	0.0
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	2,688.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Brake and Tire Wear	384.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Construction Projects	1,162.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Agricultural Tilling	59.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Subtotal	4,314.8	27.2	3.9	0.0	24.7	0.0	22.1	0.0	610.2	0.0
Total--Area + Point	4,342.0		3.9		24.7		22.1		610.2	

TABLE I (continued)
2016 Davidson County Annual Emission Inventory

STATIONARY SOURCES-TONS PER YEAR (continued)										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
FUEL COMBUSTION										
Residential	136.0	0.0	4.7	0.0	427.6	0.0	927.1	0.0	701.9	0.0
Commercial/Institutional	69.5	13.7	43.1	0.0	975.9	257.6	570.4	211.9	44.6	12.4
Industrial	8.5	0.0	2.7	0.0	68.0	0.0	36.5	0.0	4.7	0.0
Subtotal	214.0	13.7	50.5	0.0	1,471.6	257.6	1,534.0	211.9	751.3	12.4
Total--Area + Point	227.7		50.5		1,729.2		1,745.9		763.7	
SOLID WASTE DISPOSAL										
Incinerators	1.5	0.0	0.6	0.0	2.9	0.0	1.2	0.0	0.5	0.0
POTW	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	27.4	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)	117.6	0.0	0.0	0.0	0.1	0.0	944.7	0.0	128.7	0.0
Forest & Grass Fires	5.8	0.0	0.0	0.0	0.0	0.0	36.4	0.0	5.4	0.0
Subtotal	124.9	0.0	0.6	0.0	3.0	0.0	982.3	0.0	163.6	0.0
Total--Area + Point	124.9		0.6		3.0		982.3		163.6	
TOTAL STATIONARY SOURCES	4,797.2	295.7	82.9	135.6	1,608.9	1,057.5	2,708.4	241.6	7,020.1	763.5
TOTAL STATIONARY AREA + POINT	5,092.9		218.4		2,666.4		2,949.9		7,783.5	
NON-ROAD MOBILE										
Railroad Locomotives	21.3	0.0	0.4	0.0	788.6	0.0	122.2	0.0	44.4	0.0
Aircraft	13.0	0.0	77.0	0.0	707.0	0.0	2,145.0	0.0	197.0	0.0
Commercial Marine	0.0	0.0	9.9	0.0	102.5	0.0	36.6	0.0	18.3	0.0
Non-road	247.7	0.0	4.6	0.0	1,971.5	0.0	31,318.3	0.0	2,179.7	0.0
Subtotal	282.1	0.0	92.0	0.0	3,569.6	0.0	33,622.1	0.0	2,439.5	0.0
Total--Area + Point	282.1		92.0		3,569.6		33,622.1		2,439.5	

TABLE I (continued)
2016 Davidson County Annual Emission Inventory

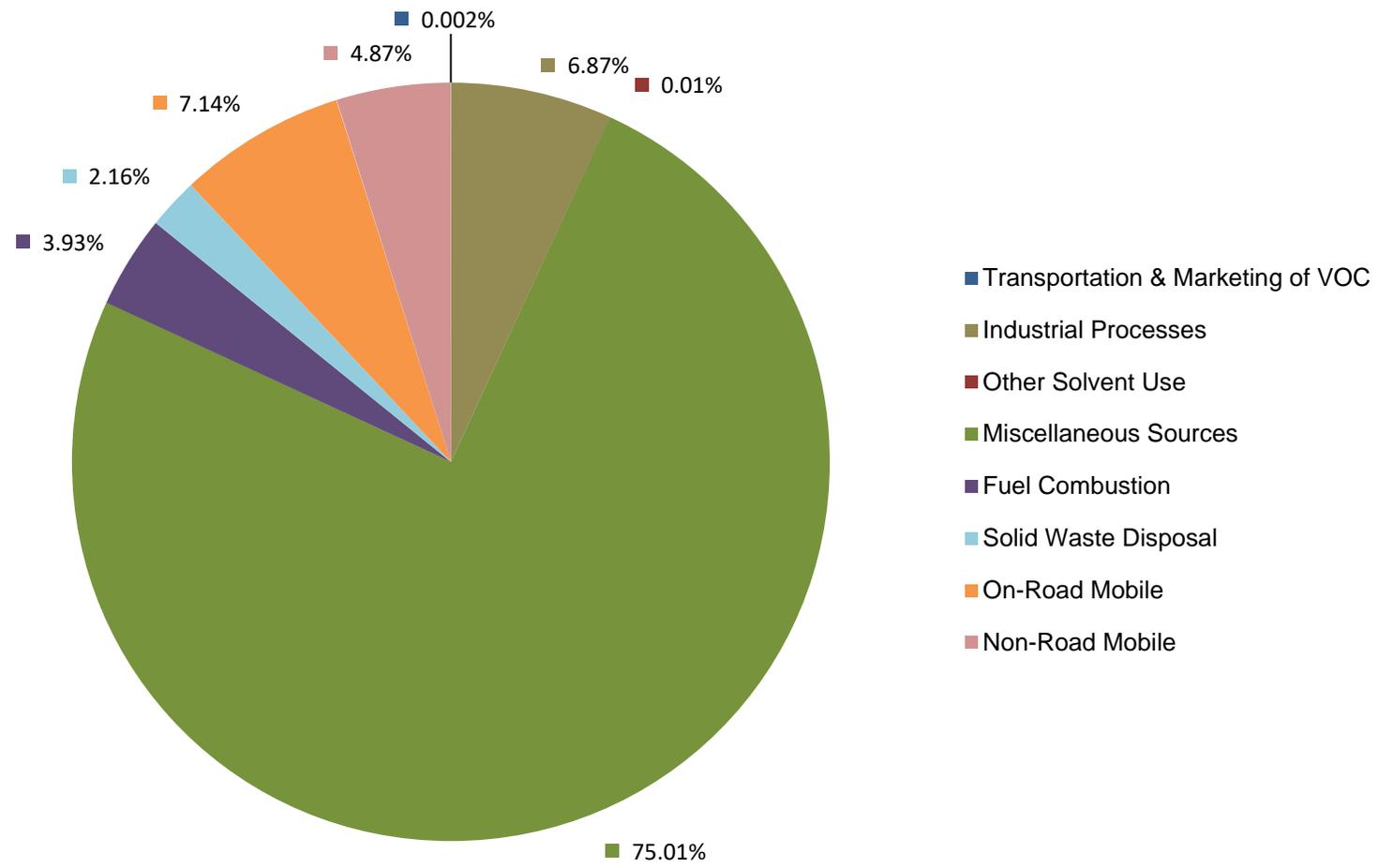
STATIONARY SOURCES-TONS PER YEAR (continued)										
SOURCE CATEGORY	PARTICULATE		SULFUR OXIDES		NITROGEN OXIDES		CARBON MONOXIDE		VOL. ORG. COMP.	
	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT	AREA	POINT
ON-ROAD MOBILE										
11 - Motorcycles	1.3	0.0	0.4	0.0	36.1	0.0	669.8	0.0	71.8	0.0
21 - Passenger Cars	35.8	0.0	31.5	0.0	2,049.5	0.0	19,856.8	0.0	1,546.8	0.0
31 - Passenger Trucks	29.9	0.0	26.7	0.0	2,366.5	0.0	19,748.2	0.0	1,229.2	0.0
32 - Light Commercial Trucks	13.8	0.0	10.2	0.0	922.6	0.0	7,480.1	0.0	448.6	0.0
41 - Intercity Buses	9.1	0.0	0.3	0.0	191.1	0.0	47.0	0.0	10.5	0.0
42 - Transit Buses	1.2	0.0	0.1	0.0	44.1	0.0	24.3	0.0	3.3	0.0
43 - School Buses	1.7	0.0	0.0	0.0	28.3	0.0	30.9	0.0	4.2	0.0
51 - Refuse Trucks	7.1	0.0	0.4	0.0	155.5	0.0	65.2	0.0	9.3	0.0
52 - Single-Unit Short Haul Trucks	54.9	0.0	4.7	0.0	1,115.7	0.0	2,137.3	0.0	179.9	0.0
53 - Single-Unit Long Haul Trucks	5.6	0.0	0.3	0.0	99.8	0.0	123.9	0.0	16.2	0.0
54 - Motor Homes	0.6	0.0	0.1	0.0	16.8	0.0	80.7	0.0	4.5	0.0
61 - Combination Short Haul Trucks	59.6	0.0	3.3	0.0	1,428.5	0.0	375.9	0.0	72.8	0.0
62 - Combination Long Haul Trucks	192.9	0.0	9.0	0.0	5,377.6	0.0	1,619.7	0.0	508.0	0.0
Subtotal	413.5	0.0	87.0	0.0	13,832.1	0.0	52,259.7	0.0	4,105.1	0.0
Total--Area + Point	413.5		87.0		13,832.1		52,259.7		4,105.1	
TOTAL MOBILE SOURCES	695.6	0.0	178.9	0.0	17,401.7	0.0	85,881.8	0.0	6,544.6	0.0
TOTAL MOBILE AREA + POINT	695.6		178.9		17,401.7		85,881.8		6,544.6	
TOTAL STATIONARY SOURCES	4,797.2	295.7	82.9	135.6	1,608.9	1,057.5	2,708.4	241.6	7,020.1	763.5
TOTAL STATIONARY AREA + POINT	5,092.9		218.4		2,666.4		2,949.9		7,783.5	
GRAND TOTAL MOBILE + STA.	5,788.5		397.3		20,068.2		88,831.7		14,328.1	

* 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, which became the recommended method of calculating the non-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine). The latest version of the model was incorporated into MOVES2014, and replaced the previous version, NONROAD2008.1.0. The latest version was used to calculate on-road mobile emissions (excluding railroad locomotives, aircraft and commercial marine) for this emissions inventory. The on-road mobile emissions were calculated using the latest version of the EPA's on-road model, MOVES2014, which replaced the previous model, MOVES2010b, in October, 2014.

** Stage II refueling emissions are accounted for in the on-road mobile emissions totals. In previous years, Stage II emissions were calculated by running the mobile model with and without Stage II refueling. The newer MOVES model takes refueling emissions into account in the model runs.

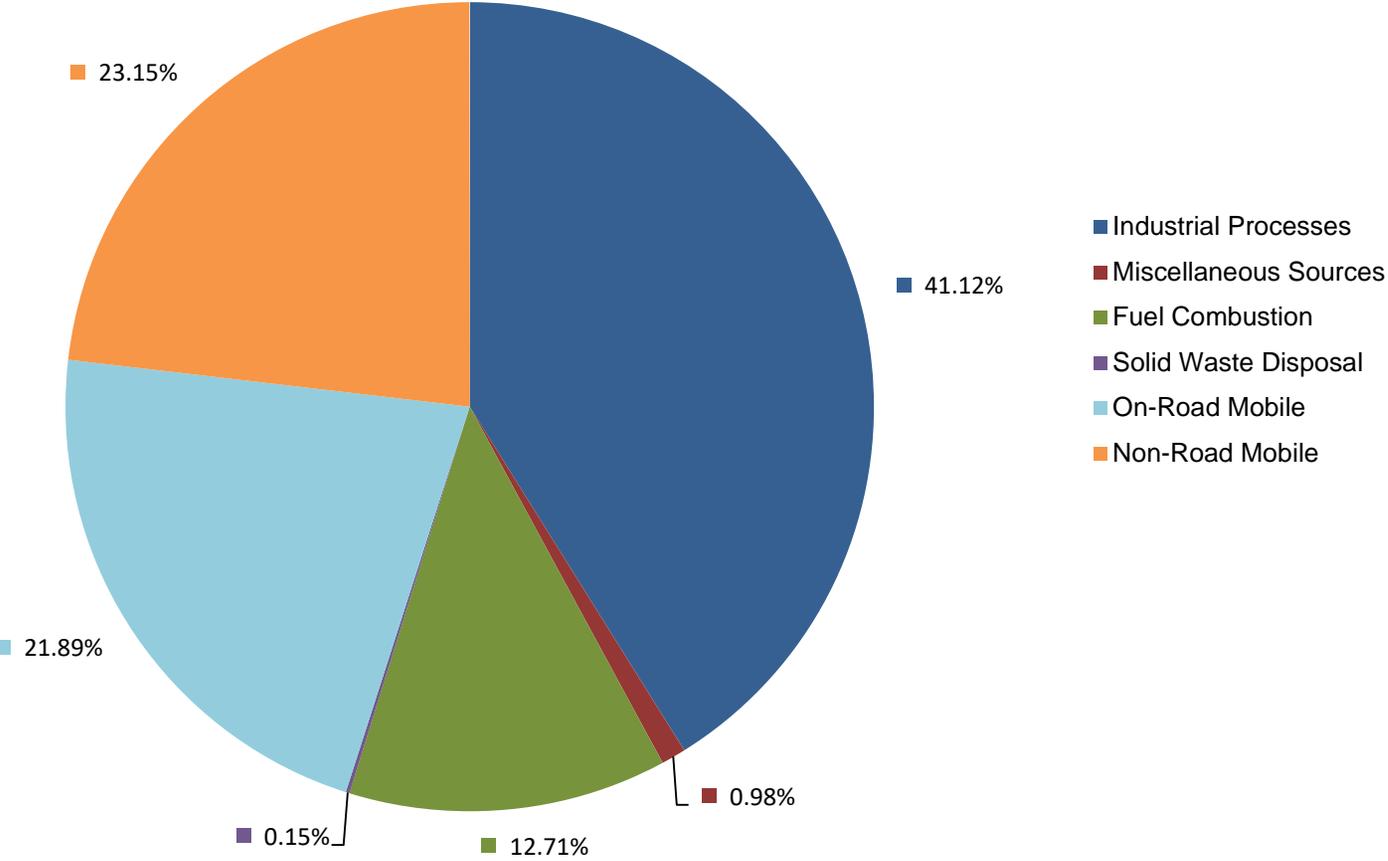
PM10 Emissions for Various Source Categories

Figure 1



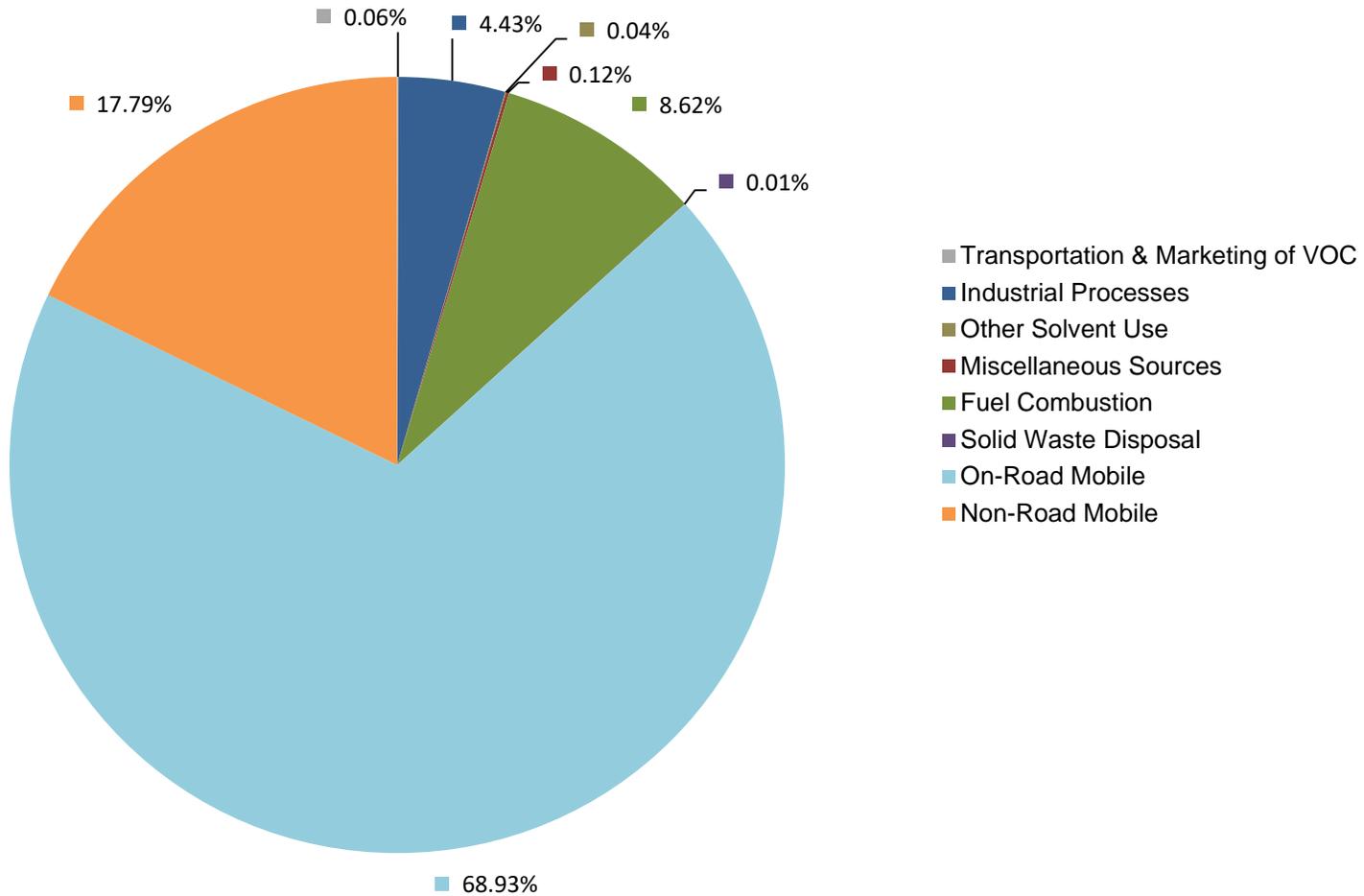
Sulfur Dioxide Emissions for Various Source Categories

Figure 2



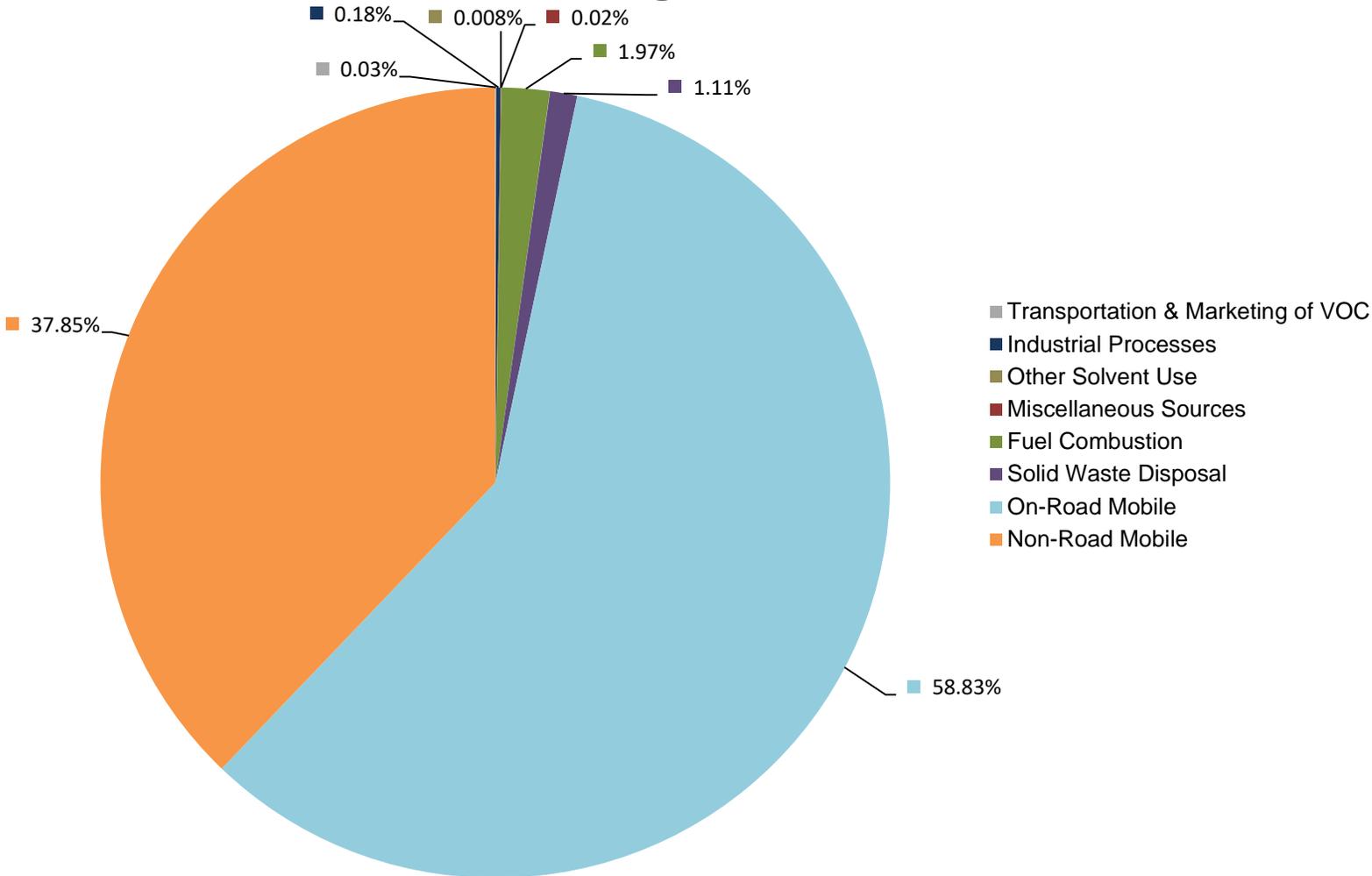
Nitrogen Oxide Emissions for Various Source Categories

Figure 3



Carbon Monoxide Emissions for Various Source Categories

Figure 4



Volatile Organic Compound Emissions for Various Source Categories Figure 5

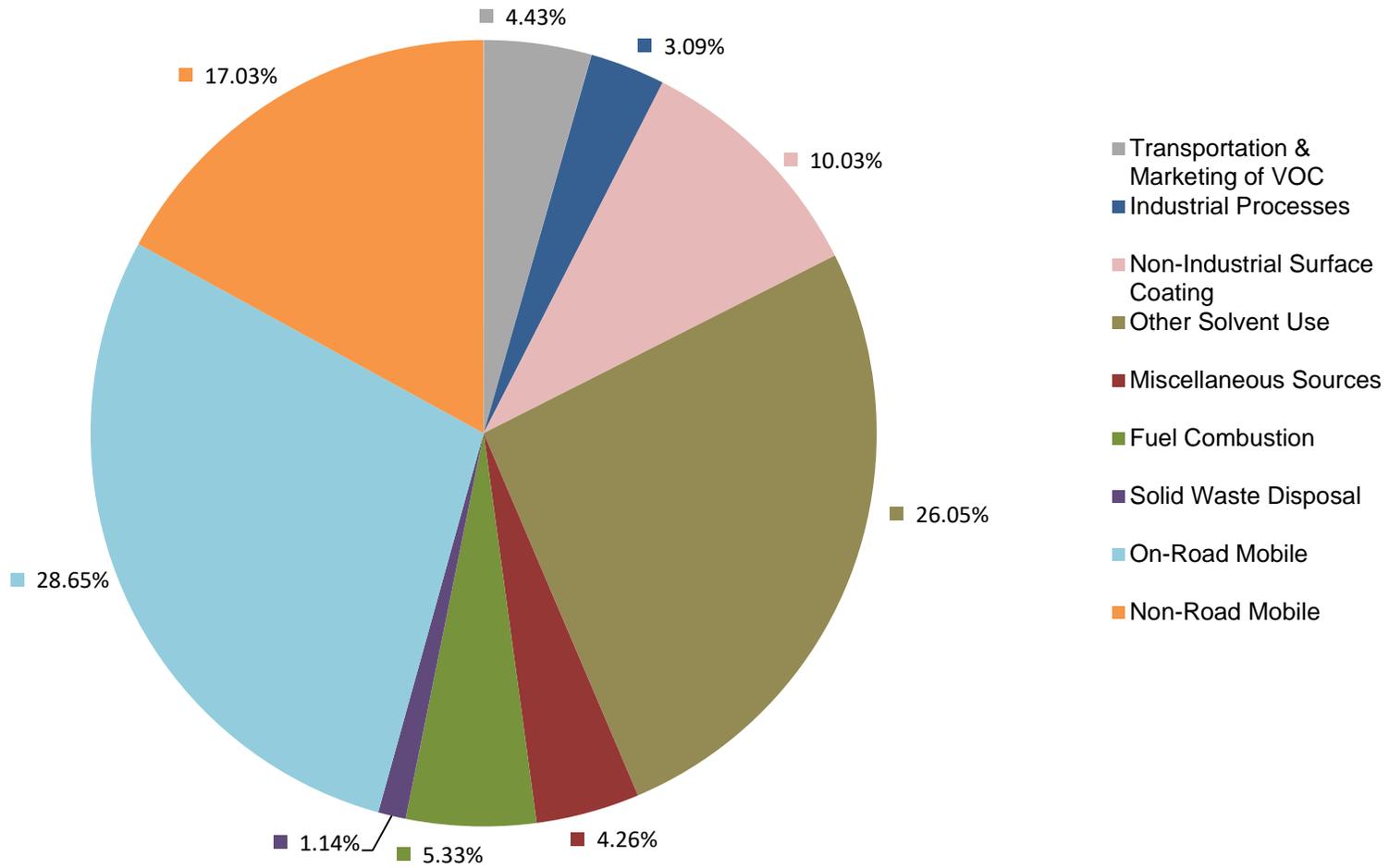


TABLE II
2004 - 2016 Annual Comparison of Nitrogen Dioxide and Volatile Organic Compound Emissions

Nitrogen Dioxide (Tons/Year)													
Source Category	2004	2005	2006	2007*	2008*	2009*	2010	2011	2012	2013**	2014**	2015**	2016**
Trans. & Mkt. of VOC	7	10	12	10	11	13	14	13	13	12	13	12	12
Industrial Processes	890	884	703	1,009	833	716	942	875	651	765	767	838	889
Other Solvents	5	6	6	7	7	23	29	6	5	12	8	7	9
Miscellaneous Sources	0	0	0	27	30	29	33	32	19	28	26	26	25
Fuel Combustion	2,565	2,348	2,238	2,208	2,294	2,027	2,142	1,394	1,215	1,629	1,834	1,373	1,729
Solid Waste Disposal	2	2	7	6	2	3	9	2	2	3	3	3	3
On-Road Mobile	16,114	14,844	13,352	24,119	21,851	19,328	16,479	15,264	14,561	16,236	14,646	12,819	13,832
Non-Road Mobile	4,657	4,648	4,542	4,318	4,176	3,927	3,756	4,261	4,053	3,721	3,803	4,048	3,570
TOTAL	24,248	22,743	21,018	31,704	29,204	26,066	23,407	21,848	20,519	22,405	21,100	19,126	20,068

* On-Road Mobile NOx emissions for 2007-2009 were re-calculated using the then-latest version of the MOVES model (MOVES 2010b)

** On-Road and Non-Road Mobile NOx emissions from 2013-2016 were calculated using the latest version of the MOVES model (MOVES 2014 and MOVES 2014a).

Volatile Organic Compounds (Tons/Year)													
Source Category	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013**	2014**	2015**	2016**
Trans. & Mkt. of VOC	677	667	691	620	717	690	728	606	609	575	587	606	634
Industrial Processes	1,344	1,068	1,075	847	640	429	457	382	414	418	423	393	443
Non-Ind. Surface Coating	1,845	1,912	1,946	1,932	2,001	2,025	1,990	1,980	2,096	2,096	2,096	1,511	1,438
Other Solvents	3,101	3,164	3,206	3,052	3,129	3,732	2,554	4,045	4,001	4,004	3,996	3,564	3,732
Miscellaneous Sources	545	550	551	553	561	579	560	568	578	578	596	605	610
Fuel Combustion	767	768	787	800	1,078	1,394	1,510	1,500	663	915	865	889	764
Solid Waste Disposal	110	55	80	126	75	91	101	76	122	115	62	88	164
On-Road Mobile	9,909	9,036	8,478	7,990	6,747	6,073	5,462	4,959	4,977	5,197	4,781	4,297	4,105
Non-Road Mobile	3,869	4,990	4,788	4,641	4,044	3,963	4,163	3,686	3,568	3,253	3,086	3,577	2,440
TOTAL	22,167	22,210	22,040	20,565	18,991	18,976	17,528	17,801	17,026	17,153	16,492	15,530	14,328

* Historically, the on-road mobile emissions were calculated using the latest version of the EPA's MOBILE model. In 1996, MOBILE5b was released, followed by MOBILE6.0 in 2002. Finally, MOBILE 6.2 was released in 2004, and was used to model emissions up through calendar year 2009. The MOBILE model was officially replaced by the MOVES model in 2010. To calculate the on-road mobile emissions, MOVES 2010a was used for calendar year 2010, and MOVES 2010b was used for calendar years 2011 and 2012. EPA has acknowledged that the MOVES model calculates significantly higher NOx emissions than the MOBILE model. Due to the significant increase in modeled NOx emissions using the MOVES model, this office went back and re-ran MOVES 2010b for NOx for calendar years 2007 through 2009, in order to give a better sense of the trend in NOx emissions using the current model.

** On-Road and Non-Road Mobile VOC emissions for 2013-2016 were calculated using the latest version of the MOVES model (MOVES 2014 and MOVES 2014a).

Annual Comparison of Nitrogen Oxide and VOC Emissions

Figure 6

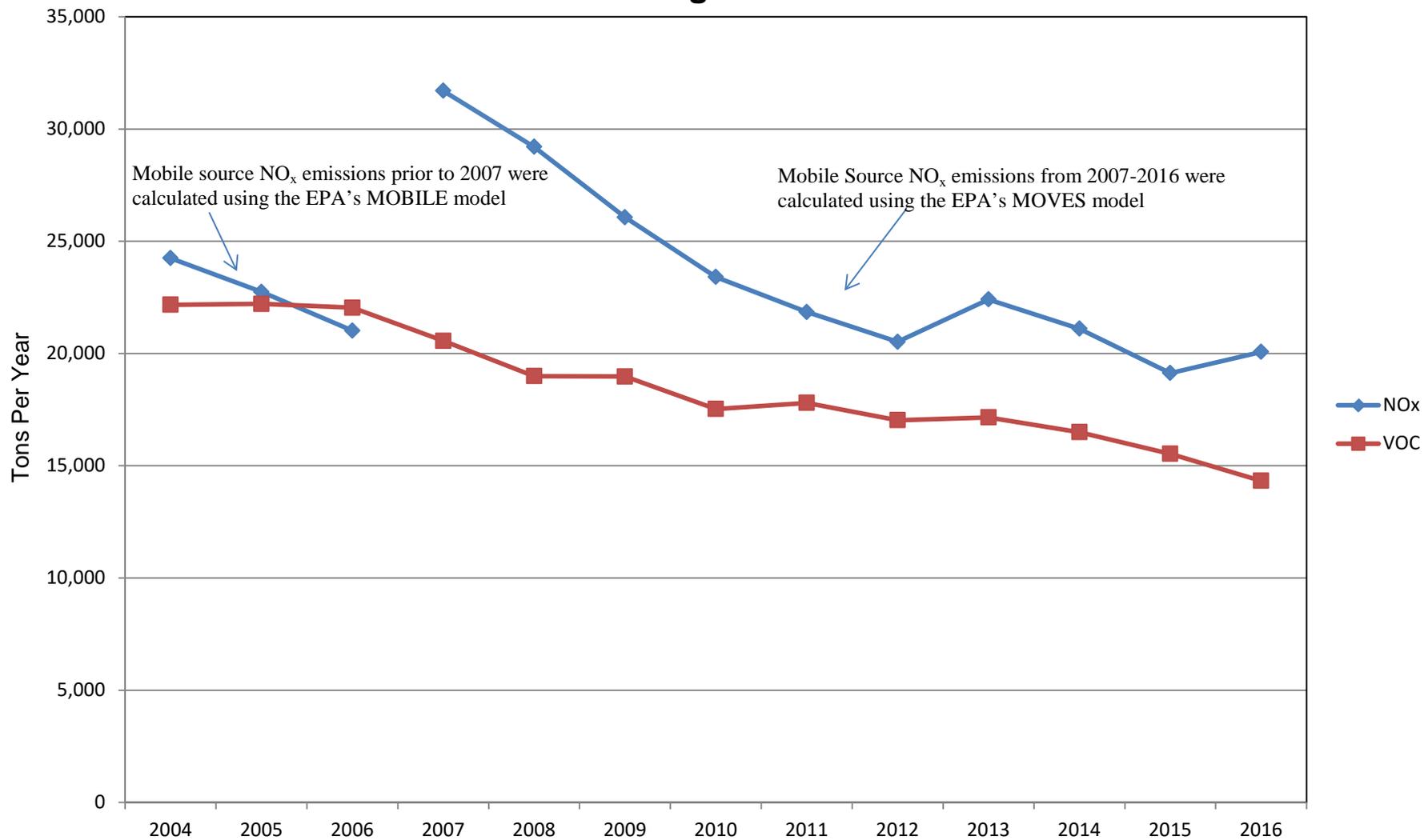


TABLE III
2016 Davidson County Hazardous Air Pollutant Emission Inventory

<u>POLLUTANT</u>	<u>CAS #</u>	<u>TPY</u>
1,1,2,2-Tetrachloroethane	79-34-5	0.009
1,1,2-Trichloroethane	79-00-5	0.016
1,2,4-Trichlorobenzene	120-82-1	0.076
1,3-Butadiene	106-99-0	13.949
1,3-Dichloropropene	542-75-6	54.753
1,4-Dichlorobenzene	106-46-7	57.308
1,4-Dioxane	123-91-1	0.185
2,2,4-Trimethylpentane	540-84-1	4.793
2-Nitropropane	79-46-9	0.001
Acetaldehyde	75-07-0	96.830
Acetophenone	98-86-2	0.003
Acrolein	107-02-8	15.309
Acrylonitrile	107-13-1	0.017
Aniline	62-53-3	0.004
Arsenic Compounds	7440-38-2	0.003
Benzene	71-43-2	167.902
Biphenyl	92-52-4	0.020
Bis (2-Ethylhexyl) Phthalate	117-81-7	2.130
Carbon Disulfide	75-15-0	0.056
Carbon Tetrachloride	56-23-5	0.047
Carbonyl Sulfide	463-58-1	0.003
Chlorine	7782-50-5	1.104
Chlorobenzene	108-90-7	24.508
Chloroform	67-66-3	0.390
Chromium Compounds	7440-47-3	0.045
Cobalt Compounds	7440-48-4	0.003
Cumene	98-82-8	0.665
Cyanide Compounds	57-12-5	0.000
Dibenzofurans	132-64-9	0.003
Dibutyl Phthalate	84-74-2	0.015
Dichlorobenzene	106-46-7	57.308
Diethanolamine	111-42-2	0.001
Dimethyl Formamide	68-12-2	4.209
Ethyl Chloride	75-00-3	2.204
Ethylbenzene	100-41-4	40.612
Ethylene Dichloride	107-06-2	0.004
Ethylene Glycol	107-21-1	12.064
Ethylene Oxide	75-21-8	5.387
Ethylidene Dichloride	75-34-3	0.012
Formaldehyde	50-00-0	205.661
Glycol Ethers	171	24.081
Hexamethylene-1,6-Diisocyanate	822-06-0	0.005
Hexane	110-54-3	218.950
Hydrogen Chloride	7647-01-0	1.615
Hydrogen Fluoride	7664-39-3	0.146
Hydrogen Sulfide	7783-06-4	34.838

TABLE III (Continued)
2016 Davidson County Hazardous Air Pollutant Emission Inventory

Hydroquinone	123-31-9	0.130
Isophorone	78-59-1	0.324
Lead Compounds	7439-92-1	0.313
Manganese Compounds	7439-96-5	0.016
Methanol	67-56-1	275.515
Methyl Bromide	74-83-9	75.970
Methyl Chloride	74-87-3	1.833
Methyl Chloroform	71-55-6	132.418
Methyl Hydrazine	60-34-4	0.000
Methyl Isobutyl Ketone	108-10-1	12.065
Methyl Methacrylate	80-62-6	0.158
Methyl tert-Butyl Ether	1634-04-4	1.503
Methylene Chloride	75-09-2	20.523
Methylene diphenyl diisocyanate	101-68-8	0.001
m-Xylene	108-38-3	0.000
Naphthalene	91-20-3	18.264
Nickel Compounds	7440-02-0	0.053
o-Toluidine	95-53-4	0.000
o-Xylene	95-47-6	0.946
Phenol	108-95-2	0.496
Phthalic Anhydride	85-44-9	0.095
Polycyclic Organic Matter	250	0.298
Propionaldehyde	123-38-6	2.655
Propylene Dichloride	78-87-5	0.001
Propylene Oxide	75-56-9	0.344
p-Xylene	106-42-3	0.000
Quinone	106-51-4	0.034
Selenium Compounds	7782-49-2	0.000
Styrene	100-42-5	1.655
Tetrachloroethylene	127-18-4	26.790
Toluene	108-88-3	217.797
Trichloroethylene	79-01-6	3.967
Triethylamine	121-44-8	0.287
Vinyl Acetate	108-05-4	0.000
Vinyl Chloride	75-01-4	0.023
Vinylidene Chloride	75-35-4	0.001
Xylenes	1330-20-7	153.371
Total of All Hazardous Air Pollutants		1,960.254

* Hydrogen Sulfide is not a Hazardous Air Pollutant, but is reported on this list because it is a regulated air pollutant, and is not reported elsewhere.

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 2016 this agency conducted:

- 1,243 inspections of stationary air pollution sources;
- 221 inspections of asbestos removal sites;
- 8 asbestos assessments on buildings to be demolished;
- 179 indoor air quality inspections;
- 101 complaint investigations; and
- 47 pressure-decay and blockage tests observed at gasoline dispensing facilities.

During 2016, this agency issued 7 warning letters, 297 notices of violation, 115 citations, 2 consent agreements, and no Director's Orders. Total penalties collected were \$27,070.

6. MONITORING ACTIVITIES

During 2016 this agency operated seven air monitoring sites in Davidson County. Figure 7 shows the location of each of these sites along with three monitoring sites that are no longer operating. 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 four sites. Two sites measure PM₁₀ and two sites measure PM_{2.5}. The two PM₁₀ sites (Trevecca College and McCann Elementary School) use manual, filter-based samplers, where PM₁₀ is measured by operating a selective size inlet sampler (SSI), and the filters are removed for weighing. Fine particulate (PM_{2.5}) samplers are operating at Lockeland Middle School and Hillwood High School. Two manual monitors, and one continuous monitor (used for AQI purposes) are in operation at Lockeland. One manual monitor is operating at Hillwood. A continuous monitor was installed at Hillwood in November, 2005, however, ceased operation October 15, 2008. The PM_{2.5} monitor located at Wright Middle School ceased operation January 1, 2008 with EPA's concurrence.

As of July 1, 2014, the Near Road site measures carbon monoxide and nitrogen dioxide through continuous monitors. Carbon monoxide was measured by a continuous monitor at Hume-Fogg High School until it ceased operation on December 31, 2013 with EPA's concurrence. The carbon monoxide monitor located at Douglas Park ceased operation May 1, 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 reports pollen counts from www.pollen.com. MPHD no longer operates a pollen sampler on-site.

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://www.nashville.gov/Health-Department.aspx>.

LOCATION OF AIR MONITORING SITES

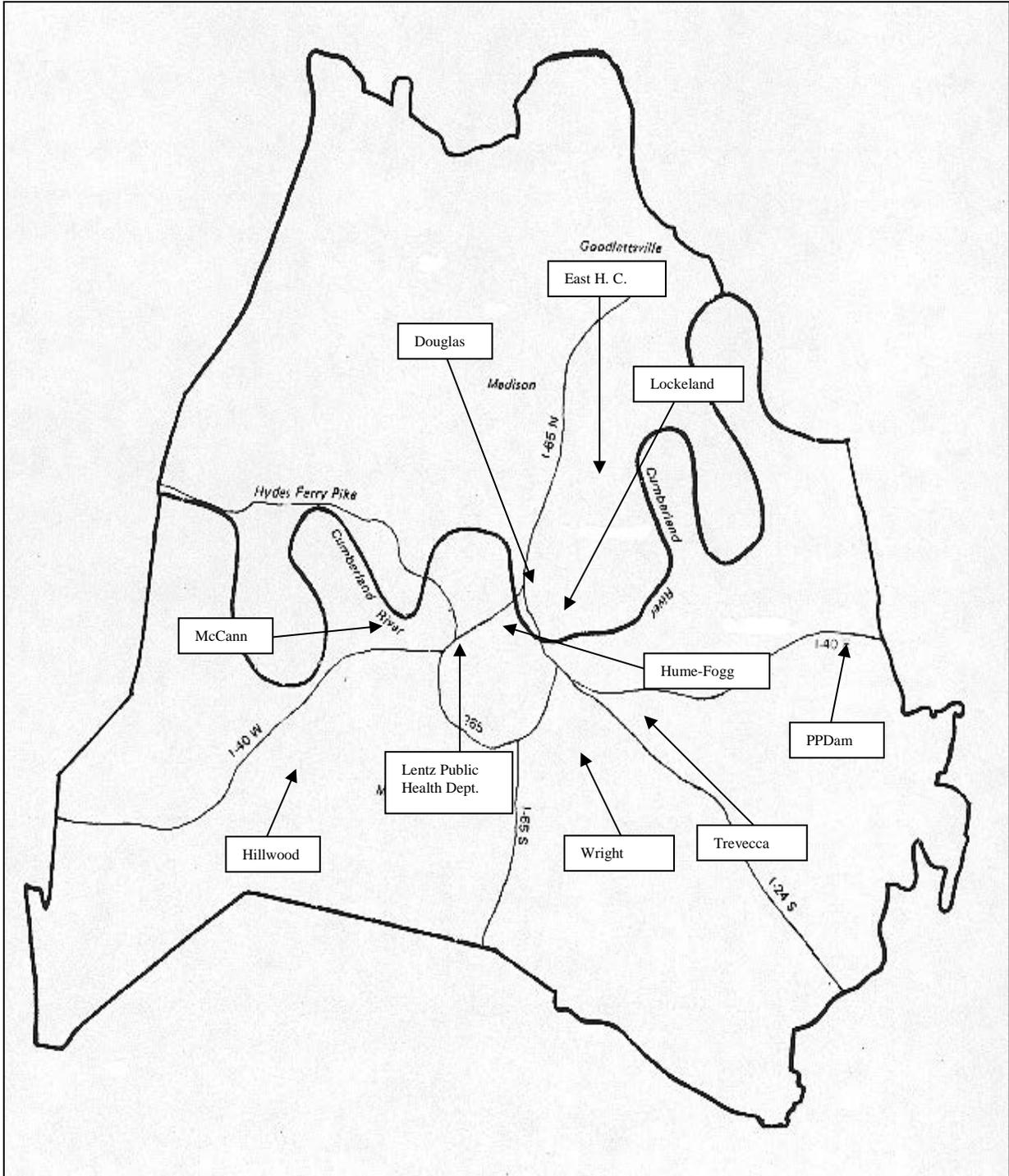


Figure 7

**TABLE IV
Air Monitoring Site Location and 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 ₁₀ **
47-037-0011	East Nashville Health Center 1015 East Trinity Lane	522.9	4006.7	CC-R	SO ₂ *, NO ₂ **, 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 _{2.5} **
47-037-0024	McCann School 1300 56th Avenue North	513.1	4002.0	CC-R, I	PM ₁₀ *
47-037-0025 ceased 1/1/08	Wright Middle School**** 180 McCall Street	523.9	3995.1	S-R	PM _{2.5} **
47-037-0026	Percy Priest Dam Bell Road	533.9	4000.7	Background	Ozone**
47-037-0031 ceased 5/1/07	Douglas Park***** 210 North Seventh St.	521.3	4003.6	CC-R	CO*
47-037-0036 ceased 10/16/08	Hillwood High School***** 400 Davidson Road	511.4	3997.1	S-R	PM _{2.5} **
47-037-0040	Near-Road Monitor 1113 Elm Hill Pk.	523.9	3999.8	CC-C	CO**, NO ₂ **
<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 CO monitor located at Hume-Fogg Magnet School, 700 Broadway ceased operation December 31, 2014 with EPA's concurrence. This is no longer an air monitoring site.

**** The PM_{2.5} monitor located at Wright Middle School, 180 McCall Street ceased operation January 1, 2008 with EPA's concurrence. This is no longer an air monitoring site.

***** The CO monitor located at Douglas Park, 210 North Seventh Street ceased operation May 1, 2008 with EPA's concurrence. This is no longer an air monitoring site.

***** The PM_{2.5} continuous monitor located at Hillwood High School, 400 Davidson Street, ceased operation October 15, 2008 with EPA's concurrence.

**Table V
National Ambient Air Quality Standards***

Pollutant	Primary Standards		Secondary Standards	
	Level	Averaging Time	Level	Averaging Time
Carbon Monoxide	9 ppm (10 mg/m ³)	8-hour ⁽¹⁾	None	
	35 ppm (40 mg/m ³)	1-hour ⁽¹⁾		
Lead	0.15 µg/m ³ ⁽²⁾ (2008 std)	Rolling 3-Month Average	Same as Primary	
Nitrogen Dioxide	100ppb	1-hour*	Same as Primary	
	53 ppb ⁽³⁾	Annual (Arithmetic Average)		
Particulate Matter (PM ₁₀)	150 µg/m ³	24-hour ⁽⁴⁾	Same as Primary	
Particulate Matter (PM _{2.5})	12.0 µg/m ³	Annual ⁽⁵⁾ (Arithmetic Average)	12.0 µg/m ³ Annual (Arithmetic Average)	
	35 µg/m ³	24-hour ⁽⁶⁾	Same as Primary	
Ozone	0.070 ppm (2015 std)	8-hour ^{(7),(8)}	Same as Primary	
Sulfur Dioxide	75 ppb	1-hour (99 th percentile of 1-hour daily max. concentrations, Averaged over 3 years)	0.5 ppm	3-hour ⁽¹⁾

* As of December 31, 2013

⁽¹⁾ Not to be exceeded more than once per year.

⁽²⁾ Final rule signed October 15, 2008.

⁽³⁾ The official level of the annual NO₂ standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard

⁽⁴⁾ Not to be exceeded more than once per year on average over 3 years.

⁽⁵⁾ To attain this standard, the 3-year average of the weighted annual mean PM_{2.5} concentrations from single or multiple community-oriented monitors must not exceed 12.0 µg/m³ for the primary standard or 15.0 µg/m³ for the secondary standard.

⁽⁶⁾ 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 35 µg/m³ (effective December 17, 2006).

⁽⁷⁾ To attain this standard, 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 0.070 ppm. (effective December 28, 2015)

⁽⁸⁾ (a) In 2007 the EPA revoked the 1-hour ozone standard in all areas, although some areas have continuing obligations under that standard ("anti-backsliding").

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).

PM₁₀ and PM_{2.5} focus on those particles with aerodynamic diameters smaller than 10 micrometers and 2.5 micrometers 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 (µg/m³) 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 PM₁₀ monitors. One site is also equipped with a co-located manual PM₁₀ monitor. The PCD also operates two sites equipped with manual PM_{2.5} monitors. One of the PM_{2.5} sites has a continuous PM_{2.5} monitor and a manual, intermittent PM_{2.5} monitor operating.

Table VI presents a summary of the measured PM₁₀ concentrations during 2016. This data shows that the ambient air quality standard for PM₁₀ was not exceeded in 2016. Tables VII and VIII compare the PM₁₀ concentrations for the past ten years. Figures 8 and 9 summarize the maximum 24-hour monitored concentrations and the maximum 24-hour annual average PM₁₀ concentrations for years 2007-2016.

Tables IX, X, and XI present a summary of the 2016 PM_{2.5} data. Figures 10 and 11 summarize the annual 98th percentile of 24-hour monitored concentrations and the maximum 24 hour annual average PM_{2.5} concentrations for years 2007 - 2016. Figure 10 shows that Davidson County is in compliance with the 24-hour average standard based on the 3-year average of the annual 98th percentile of 24-hour monitored concentrations. Figure 11 shows that based on the 2014 - 2016 data, Davidson County complied with the annual average PM_{2.5} National Ambient Air Quality Standard. In order to determine compliance with the annual PM_{2.5} 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 µg/m³, the Middle Tennessee area will demonstrate attainment with the PM_{2.5} standard. For the period of 2014 - 2016, the Middle Tennessee area was in attainment with the annual NAAQS for PM_{2.5} even without spatial averaging.

SITE LOCATION	Trevecca	McCann	McCann Colocated
Number of Observations	61	56	56
Maximum 24-Hr Concentration	56	53	52
2nd Maximum 24-Hr Concentration	34	34	32
3rd Maximum 24-Hr Concentration	33	33	30
4th Maximum 24-Hr Concentration	29	30	30
Annual Arithmetic Mean	18.2	18.2	18.2
Number of Exceedances of 24-Hr Standard (150 µg/m ³)	0	0	0

Site Location	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Trevecca	58	38	37	42	35	29	30	34	66	56
East*	n/a									
Lockeland*	n/a									
McCann	53	38	35	42	35	36	30	40	69	53

Site Location	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Trevecca	24	20	17	20	18	16	17	17	20	18
East*	n/a									
Lockeland*	n/a									
McCann	26	21	18	21	19	18	16	18	20	18

* Due to the density of PM₁₀ monitoring sites in Davidson County and the history of the Davidson County PM₁₀ values being well below the NAAQS for PM₁₀, 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. Also On September 21, 2006 the EPA revoked the annual PM₁₀ standard.

TABLE IX
2016 Summary of PM_{2.5} (µg/m³)

SITE LOCATION	Lockeland	Lockeland Colocated	Hillwood
Number of Observations	349	52	304
Maximum 24-Hr Concentration	36.5	31.7	25.7
2nd Maximum 24-Hr Concentration	31.9	17.0	22.8
3rd Maximum 24-Hr Concentration	20.1	14.7	22.2
4th Maximum 24-Hr Concentration	18.4	14.5	18.1
Number of Exceedances of 24-Hr Standard (35 µg/m ³)	1	0	0
Annual Arithmetic Mean (Standard = 12.0 mg/m3)	8.85	9.26	8.21

TABLE X
2011 - 2016 24-Hour Maximum PM_{2.5} Concentrations (µg/m³)

Site Location	2011	2012	2013	2014	2015	2016
Lockeland	32.7	24.1	27.0	24.8	24.4	36.5
Lockeland (colocated)	23.9	22.5	21.2	22.6	18.8	31.7
Wright*	n/a ¹					
Hillwood	29.3	22.5	35.7	24.4	24.0	25.7

TABLE XI
2011 - 2016 Annual Average PM_{2.5} Concentrations (µg/m³)

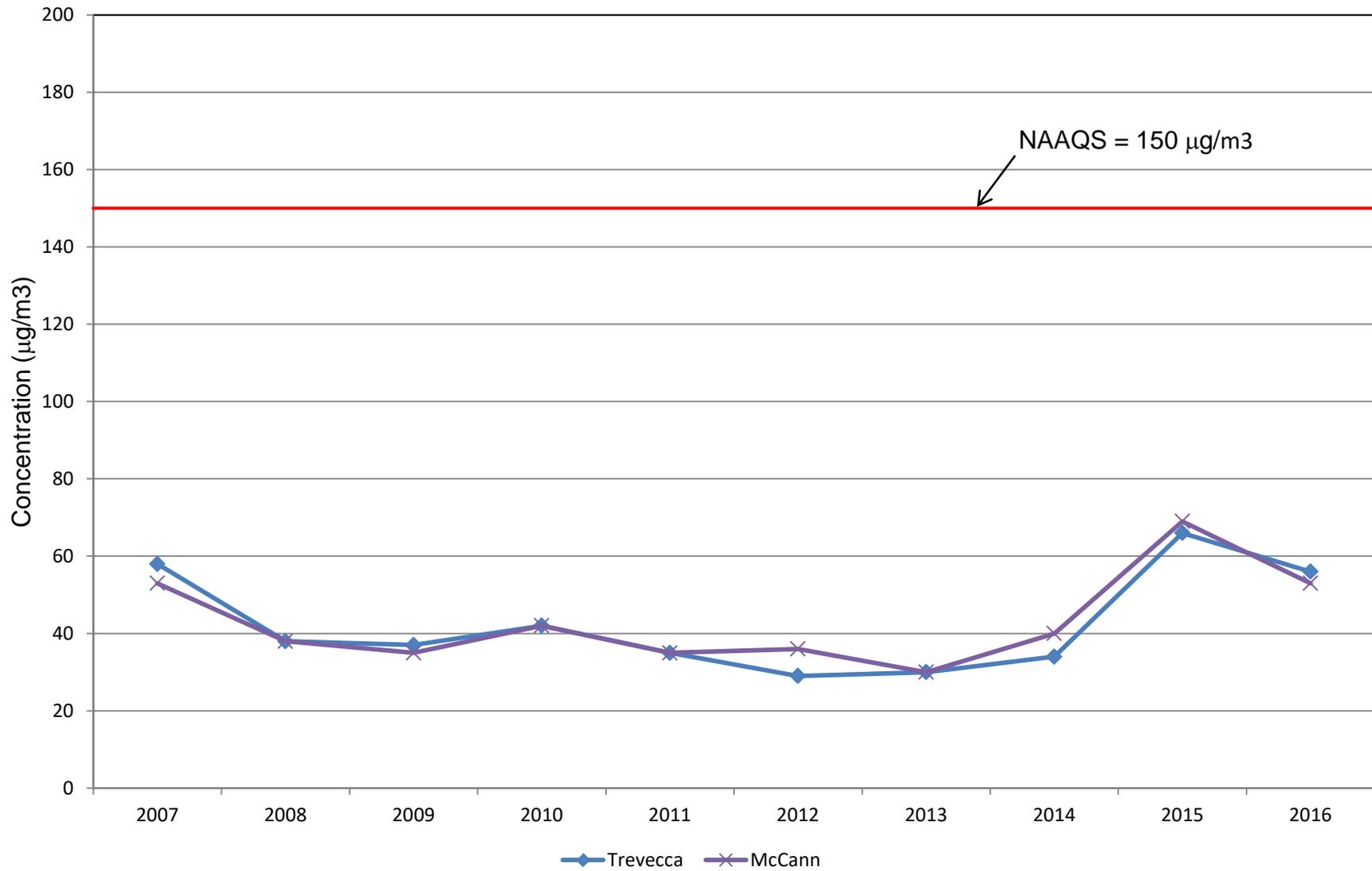
Site Location	2011	2012	2013	2014	2015	2016	LATEST 3 YEAR AVERAGE
Lockeland	10.6	10.3	10.1	10.5	9.6	8.9	9.7
Lockeland (colocated)	11.1	10.1	9.6	9.9	9.8	9.3	9.7
Wright*	n/a ¹	n/a¹					
Hillwood	10.0	9.5	9.4	9.9	8.8	8.2	9.0
Sumner County	10.4	9.5	10.0	9.5	8.3	8.0	8.6
Spatial Avg. of Valid Monitors	10.5	9.9	9.8	10.0	9.1	8.6	9.2

¹ The PM_{2.5} monitor located at Wright Middle School, 180 McCall Street ceased operation December 31, 2007 with EPA's concurrence.

To determine 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 2014 - 2016, the Middle Tennessee area was in attainment with the PM_{2.5} NAAQS even without spatial averaging.

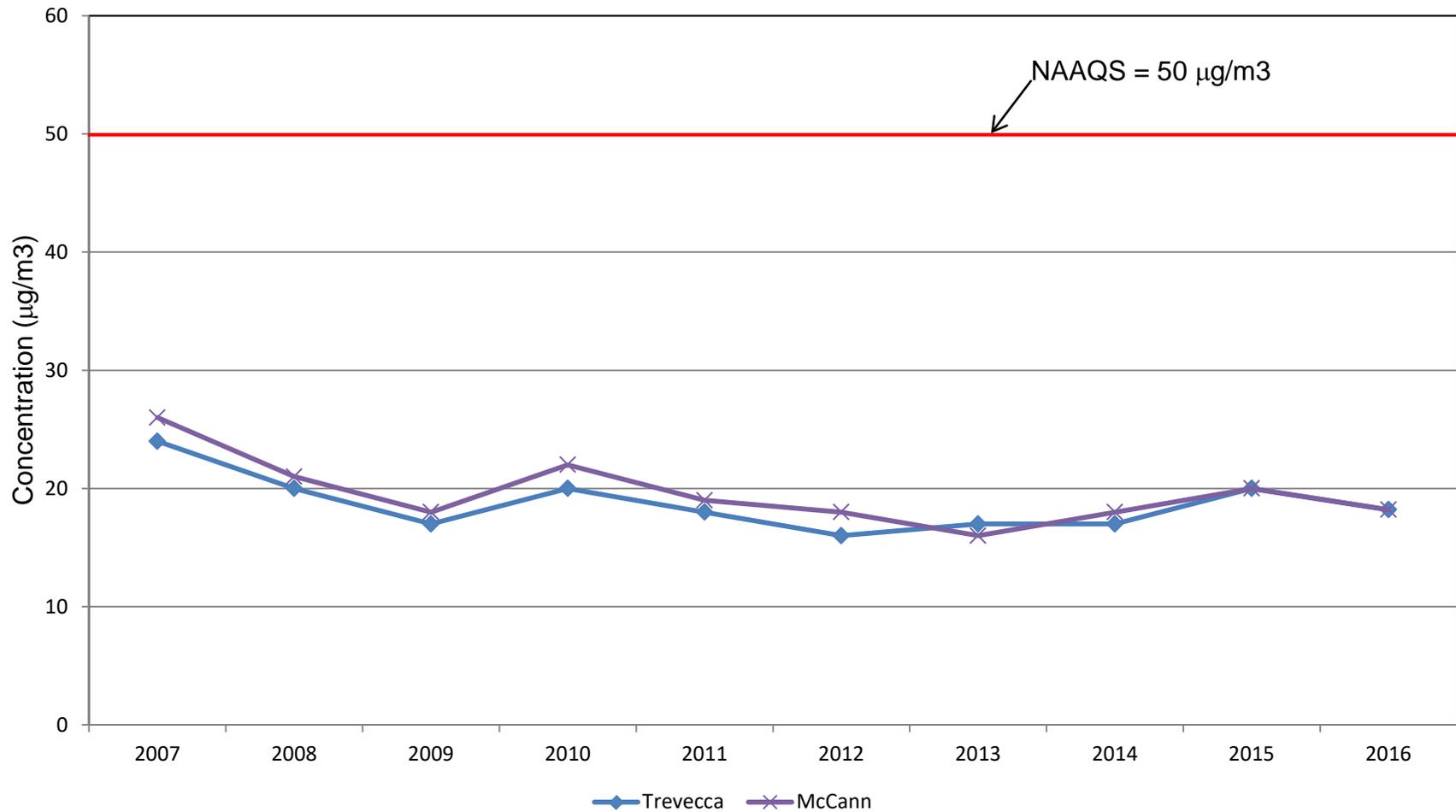
Maximum 24-Hour PM10 Concentrations ($\mu\text{g}/\text{m}^3$)

Figure 8



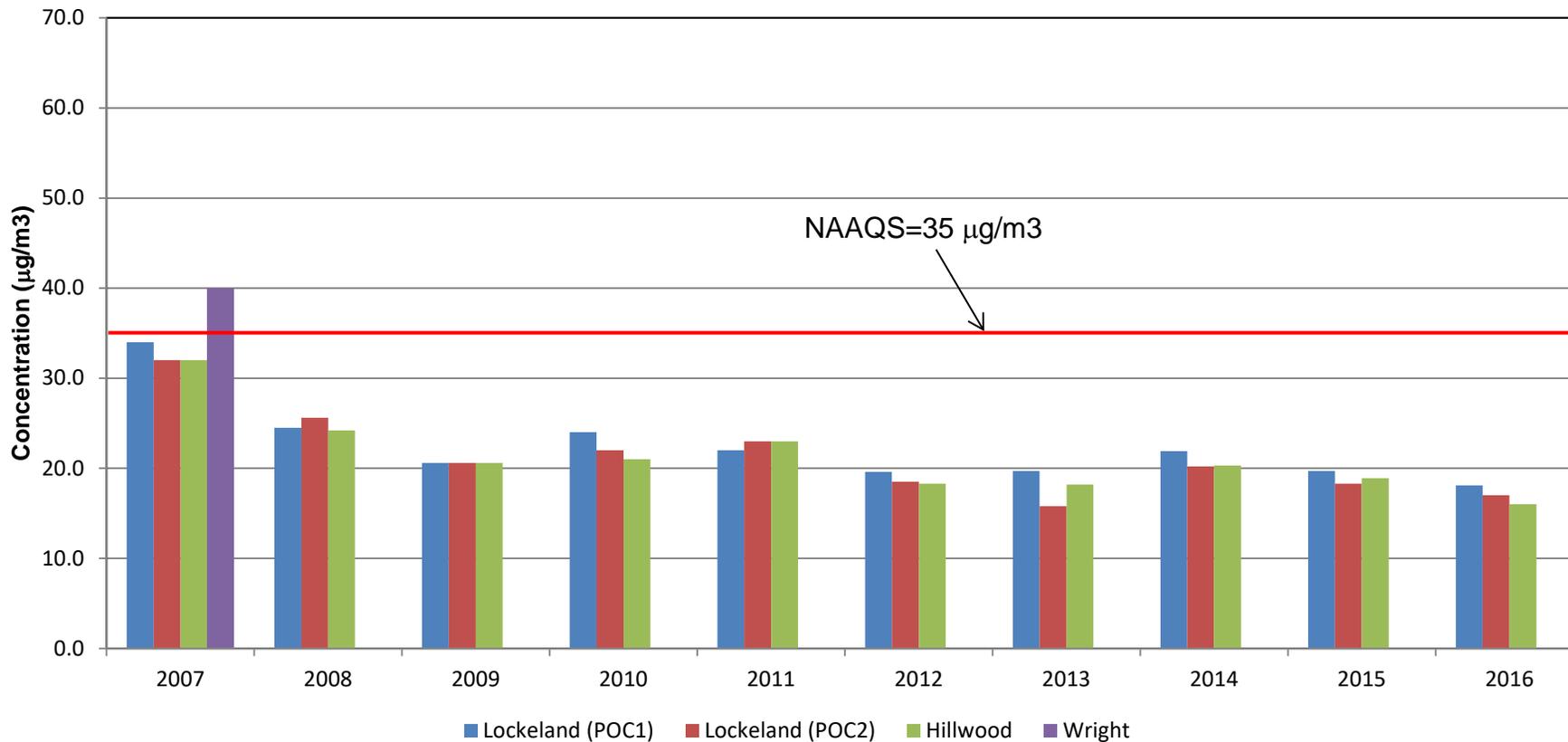
Annual Average PM10 Concentrations ($\mu\text{g}/\text{m}^3$)

Figure 9



On September 21, 2006 the EPA revoked the annual PM10 standard, because available evidence generally did not suggest a link between long-term exposure to the current levels of coarse particles and health problems.

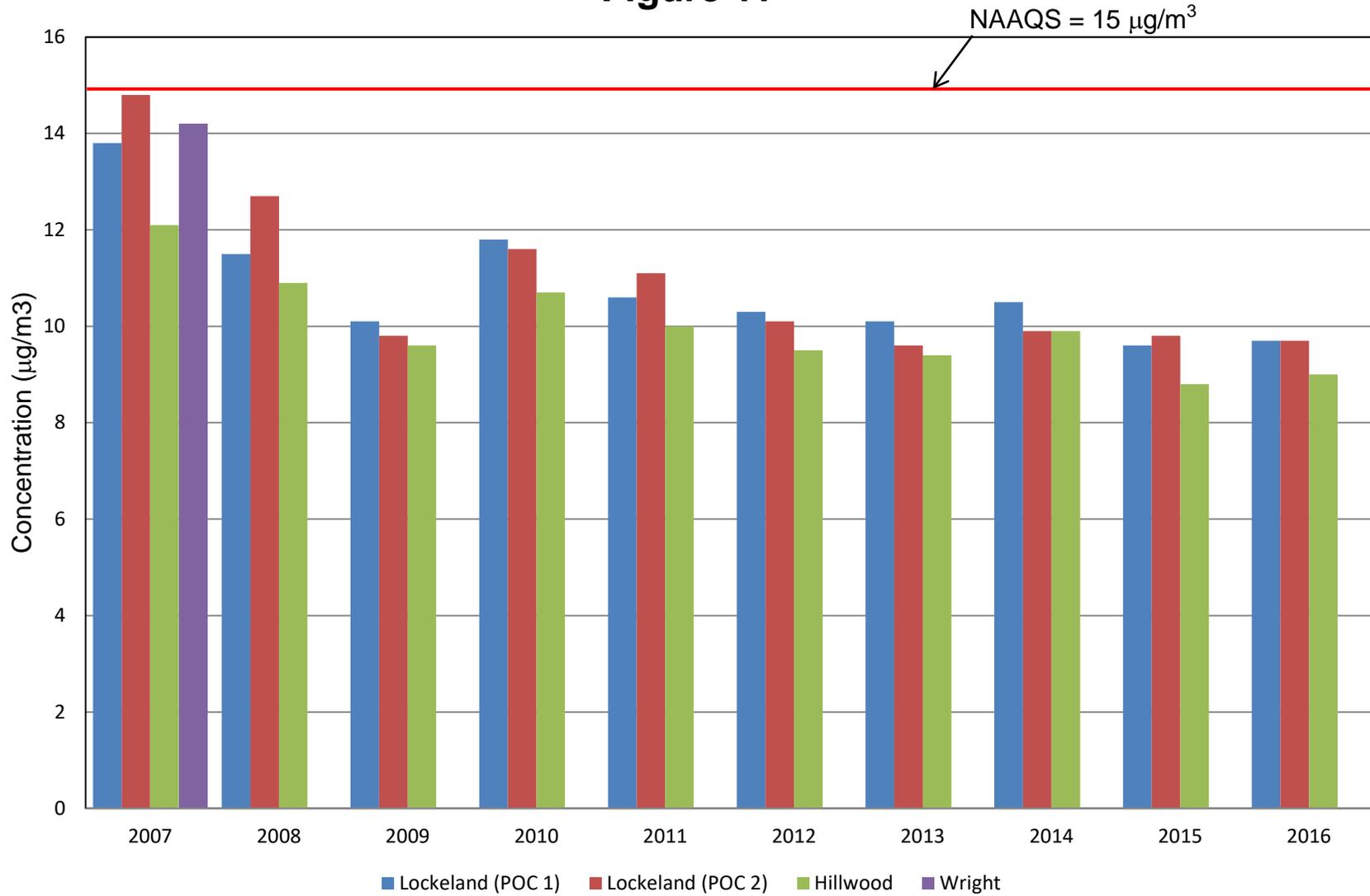
Annual 98th Percentile of 24-Hour PM_{2.5} Concentrations (µg/m³) Figure 10



On December 17, 2006, the 24 hour PM_{2.5} standard was reduced from 65 µg/m³ to 35 µg/m³. Attainment is demonstrated when the 3-year average of the 98th percentile of 24 hour monitored concentrations is less than or equal to 35 µg/m³. The 3-year average for Lockland and Hillwood demonstrate attainment with the more stringent standard.

Annual Average PM2.5 Concentrations ($\mu\text{g}/\text{m}^3$)

Figure 11



LEAD

The traditional major sources of ambient lead are from the combustion of leaded gasoline, and the manufacture of lead storage batteries. Based on low monitored lead levels and EPA guidance, ambient monitoring for lead was discontinued in Nashville and Davidson County on December 31, 1997. On October 15, 2008 the lead standard was revised. Davidson County was not required to resume monitoring.

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 2016. Table XII presents a summary of this data. The data shows that the primary 1-hour standard of 0.075 ppm and the secondary 3-hour standard of 0.5 ppm were not violated in 2016. The main source of sulfur dioxide in Metropolitan Nashville and Davidson County is from fuel combustion.

YEAR	2014	2015	2016
No. of Observations	7,963	8,665	8,692
99 th Percentile 1-Hr Conc.	0.013	0.007	0.002
3-Year Avg. of 99th Percentile			0.007

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_x). Of these, nitrogen dioxide (NO₂) 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 approximately 69% of the nitrogen dioxide emissions in 2016, with light duty cars and trucks responsible for 27% of the total nitrogen dioxide emissions.

Nitrogen dioxide was measured at East Health Center (site 0011) during 2016. Tables XIII and XIV present a summary of this data. The current NAAQS for nitrogen dioxide are 0.053 ppm as an annual arithmetic average and 0.10 ppm as a 1-hour standard (calculated as the 98th percentile 1-hour concentrations, averaged over 3 years). The data in the tables below show that the standards for nitrogen dioxide were not violated in 2016.

TABLE XIII		
2016 Summary of Nitrogen Dioxide (ppm)		
SITE LOCATION	East Health Center	Near-Road Monitor
Number of Observations	8,274	8,555
Maximum 1-Hr Concentration	0.042	0.065
2nd Maximum 1-Hr Concentration	0.041	0.062
98 th Percentile 1-Hr Concentration	0.038	0.054
Number of Exceedances of 1-Hr Standard	0	0
Annual Arithmetic Mean	0.009	0.016

TABLE XIV							
2011 - 2016 Maximum 1-Hour Nitrogen Dioxide Concentrations (ppm)*							
Site Location	2011	2012	2013	2014	2015	2016	LATEST 3 YEAR AVERAGE
East Health Center	0.058	0.060	0.054	0.043	0.046	0.042	0.044
Near-Road Monitor	-	-	-	0.063	0.058	0.065	0.062

* The 1-hour NAAQS for nitrogen dioxide is calculated as the 98th percentile concentrations averaged over 3 years. Since the highest 1-hour concentrations are all below the NAAQS of 0.100 ppm, the 98th percentile concentrations would likewise be lower than the NAAQS.

OZONE

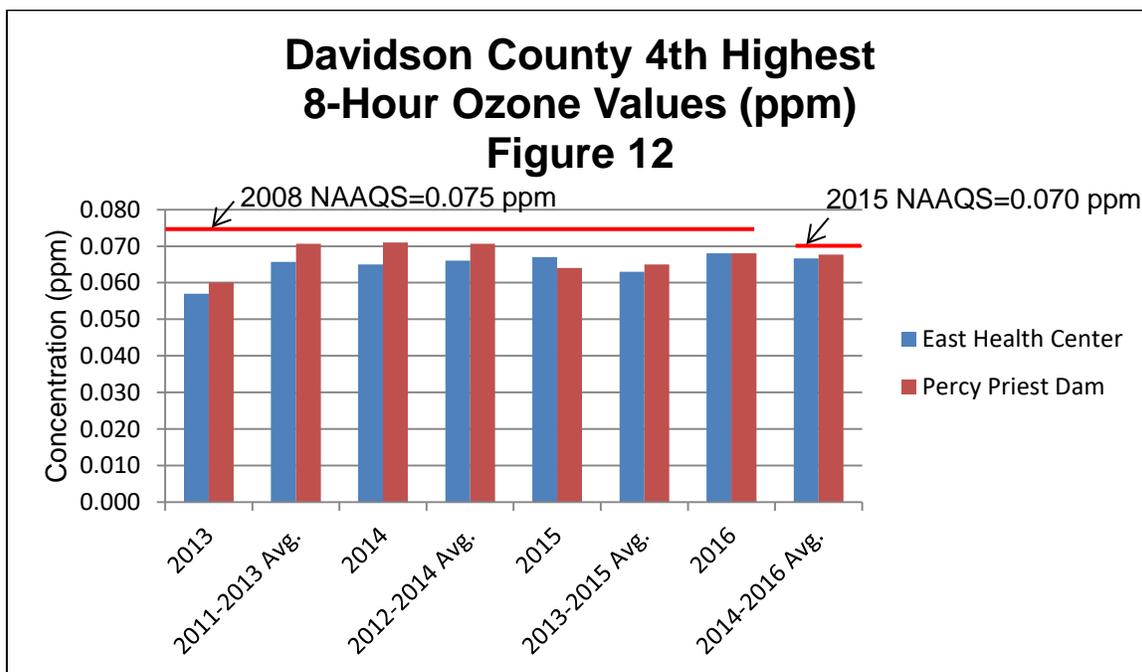
Ozone (O₃) is an unstable, pungent gas in the stratosphere, about ten miles above the earth, which protects us by shielding us from the sun's ultraviolet rays. Tropospheric ozone at the earth's surface has a different effect, acting as an eye, nose and throat irritant. It can lower a person's resistance to infection, cause shortness of breath, and over time could damage the lungs. Tropospheric ozone 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 non-methane 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.

Table XV contains summaries of the four highest 8-hour average ozone concentrations for the past ten years, and Figure 12 shows the 4th highest 8-hour ozone concentrations for 2013-2016, along with the number of exceedances of the 8-hour standard.

TABLE XV										
2007 – 2016 Annual Comparison of 8-Hour Average Ozone Concentrations (ppm)										
SITE 47-037-0011 EAST HEALTH CENTER										
YEAR	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Highest 8-hour average concentration	0.079	0.078	0.069	0.071	0.081	0.089	0.065	0.071	0.069	0.078
2 nd highest 8-hour average concentration	0.077	0.074	0.064	0.068	0.070	0.082	0.057	0.069	0.068	0.077
3 rd highest 8-hour average concentration	0.073	0.073	0.060	0.067	0.066	0.078	0.057	0.068	0.067	0.075
4 th highest 8-hour average concentration	0.072	0.065	0.060	0.067	0.064	0.076	0.057	0.065	0.067	0.068
No. of exceedances of the 8-hour standard	0	1	0	0	1	4	0	0	0	3
SITE 47-037-0026 PERCY PRIEST DAM										
YEAR	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Highest 8-hour average concentration	0.100	0.079	0.065	0.080	0.085	0.093	0.063	0.073	0.068	0.076
2 nd highest 8-hour average concentration	0.088	0.077	0.065	0.075	0.078	0.091	0.062	0.073	0.067	0.074
3 rd highest 8-hour average concentration	0.083	0.074	0.062	0.073	0.076	0.085	0.061	0.072	0.066	0.072
4 th highest 8-hour average concentration	0.079	0.071	0.060	0.072	0.071	0.081	0.060	0.071	0.064	0.068
No. of exceedances of the 8-hour standard	2	2	0	1	3	5	0	0	0	3

The EPA adopted a new 8-hour NAAQS of 0.070 ppm for ozone in December 2015. The data in Table XV shows that there were no monitoring periods during 2016 when the fourth highest 8-hour average ozone concentration was greater than 0.070 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 0.070 ppm. The Davidson County 3-year average (2014, 2015, and 2016) at the East Health Center site is 0.067 ppm, and at the Percy Priest Dam site is 0.068 ppm, which are both below the 8-hour NAAQS.



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 area, including Davidson County, was designated attainment for the 1997 ozone NAAQS.

Table XVI shows the highest ozone values measured in the Middle Tennessee area during the 3-year period of 2014 through 2016. Compliance with the 2015 8-hour standard is achieved when the three year average of the annual fourth highest 8-hour ozone value does not exceed 0.070 ppm. Therefore, all of the sites where ozone monitoring was conducted during 2016 are in compliance with the 8-hour ozone NAAQS of 0.070 ppm.

TABLE XVI
2014 - 2016 Summary of the Four Highest 8-Hour Average Ozone Concentrations in the Middle Tennessee Area

SITE NUMBER & LOCATION	YEAR	MAXIMUM CONCENTRATIONS				NUMBER OF READINGS > 8-Hr. STANDARD	3-YEAR AVG. OF 4 th HIGHEST CONCENTRATION
		1 st 8-Hr.	2 nd 8-Hr.	3 rd 8-Hr.	4 th 8-Hr.		
47-037-0011 East Health Center-Davidson	2014	0.071	0.069	0.068	0.065	0	
	2015	0.069	0.068	0.067	0.067	0	
	2016	0.078	0.077	0.075	0.068	3	0.067
COMPLIANCE WITH NAAQS						Yes	
47-037-0026 Percy Priest Dam-Davidson	2014	0.073	0.073	0.072	0.071	0	
	2015	0.068	0.067	0.066	0.064	0	
	2016	0.076	0.074	0.072	0.068	3	0.068
COMPLIANCE WITH NAAQS						Yes	
47-165-0007* Old Hickory Dam-Sumner	2014	0.077	0.070	0.066	0.066	1	
	2015	0.074	0.070	0.067	0.067	1	
	2016	0.090	0.081	0.078	0.077	4	0.070
COMPLIANCE WITH NAAQS						Yes	
47-187-0106* Fairview- Williamson	2014	0.072	0.066	0.064	0.063	1	
	2015	0.065	0.064	0.063	0.061	0	
	2016	0.077	0.077	0.072	0.070	3	0.065
COMPLIANCE WITH NAAQS						Yes	
47-189-0103* Cedars of Lebanon-Wilson	2014	0.066	0.066	0.065	0.064	0	
	2015	0.068	0.062	0.061	0.061	0	
	2016	0.080	0.075	0.074	0.074	4	0.066
COMPLIANCE WITH NAAQS						Yes	

*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 2016, carbon monoxide was measured at the Near-Road Monitor (site 0040). The Donelson Library site (site 0028) was taken out of service at the end of 2002, the Douglas Park site (site 0031) was taken out of service on April 30, 2007, and the Hume-Fogg site (site 0021) was taken out of service at the end of 2013, with EPA concurrence, due to continuing compliance with the carbon monoxide NAAQS. Table XVII presents a summary of the carbon monoxide data for 2016. This data along with Figures 13 and 14 show that the National Ambient Air Quality Standards of 35 ppm as a 1-hour average and 9 ppm as an 8-hour average were not violated during 2016.

TABLE XVII	
2016 Summary of Carbon Monoxide Concentrations (ppm)	
SITE	NEAR-ROAD
Highest 1-Hr Conc.	1.8
2nd Highest 1-Hr Conc.	1.7
No. of 1-Hr Exceedances	0
Highest 8-Hr Conc.	1.6
2nd Highest 8-Hr Conc.	1.5
No. of 8-Hr Exceedances	0
No. of Days 8-Hr Exceedances	0

Tables XVIII, XIX, XX, and Figures 13 and 14, show a comparison of the concentrations of carbon monoxide over the past several years. This data shows no violations of the 1-hour NAAQS of 35 ppm or the 8-hour NAAQS of 9.0 ppm since 1992.

TABLE XVIII
1992– 2016 Annual Comparison of Carbon Monoxide Concentrations (ppm)

SITE 247-037-0021 HUME FOGG MAGNET SCHOOL

YEAR	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Highest 1-Hr Conc.	8.5	11.0	9.0	7.5	6.0	7.5	6.9	7.9	5.7	5.0	4.9	5.4	3.9	3.3	3.5	3.0	3.2	2.4	3.3	2.1	1.9	1.7	N/A	N/A	N/A
2nd Highest 1-Hr Conc.	8.0	8.5	9.0	7.0	5.5	7.0	5.8	7.6	5.7	4.8	4.8	4.9	3.9	3.3	3.4	2.9	3.2	2.2	2.9	1.9	1.6	1.6	N/A	N/A	N/A
Highest 8-Hr Conc.	6.3	7.0	6.3	6.5	4.4	5.8	4.9	6.2	3.9	3.7	3.7	3.9	2.7	2.6	3.0	2.3	2.4	1.7	2.2	1.6	1.7	1.3	N/A	N/A	N/A
2nd Highest 8-Hr Conc.	5.8	8.5	5.4	4.8	4.1	5.1	4.6	5.2	3.6	3.7	3.5	3.0	2.7	2.4	2.6	2.1	2.3	1.6	1.9	1.4	1.5	1.2	N/A	N/A	N/A
No. of 1-Hr Exceedances of the Standard (35 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A	N/A
No. of 8-Hr Exceedances of the Standard (9 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A	N/A
No. of Days 8-Hr. Standard Exceeded (Standard = 9 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	N/A	N/A

SITE 47-037-0040 NEAR-ROAD MONITOR**

YEAR	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Highest 1-Hr Conc.	N/A	1.4	1.8	1.8																					
2nd Highest 1-Hr Conc.	N/A	1.4	1.7	1.7																					
Highest 8-Hr Conc.	N/A	1.3	1.6	1.6																					
2nd Highest 8-Hr Conc.	N/A	1.2	1.4	1.5																					
No. of 1-Hr Exceedances of the Standard (35 ppm)	N/A	0	0	0																					
No. of 8-Hr Exceedances of the Standard (9 ppm)	N/A	0	0	0																					
No. of Days 8-Hr. Standard Exceeded (Standard = 9 ppm)	N/A	0	0																						

* The Hume-Fogg carbon monoxide monitor was taken out of service at the end of 2013.

** The Near-Road Monitor began operation in 2014.

TABLE XIX
1989– 2002 Annual Comparison of Carbon Monoxide Concentrations (ppm)

SITE 247-037-0028 DONELSON LIBRARY*														
YEAR	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Highest 1-Hr Conc.	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.	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.	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.	5.6	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 (35 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of 8-Hr Exceedances of the Standard (9 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
No. of Days 8-Hr. Standard Exceeded (Standard = 9 ppm)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

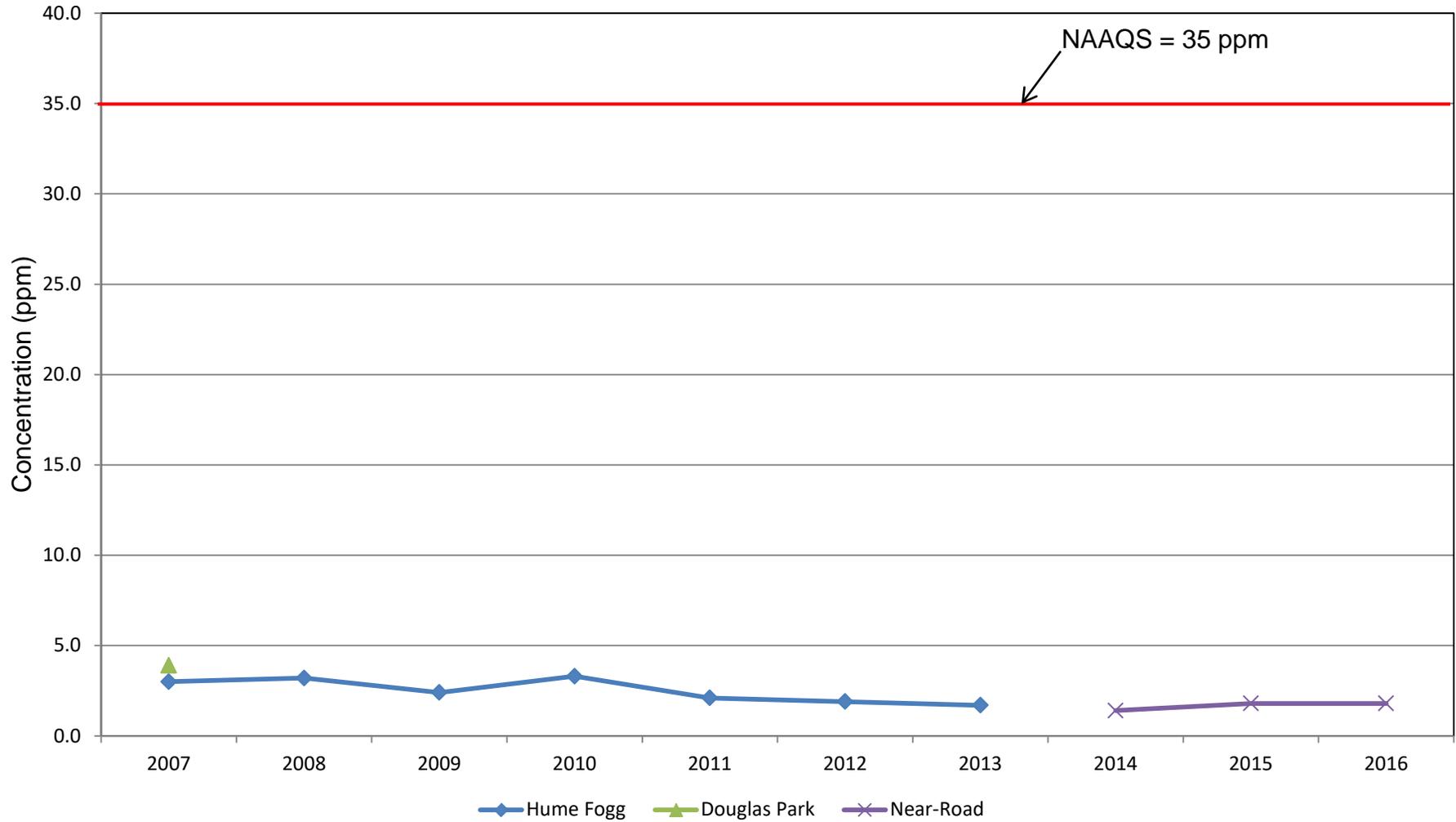
*The Donelson Library site was taken out of service in 2002.

TABLE XX
1989 - 2007 Annual Comparison of Carbon Monoxide Concentrations, (ppm)

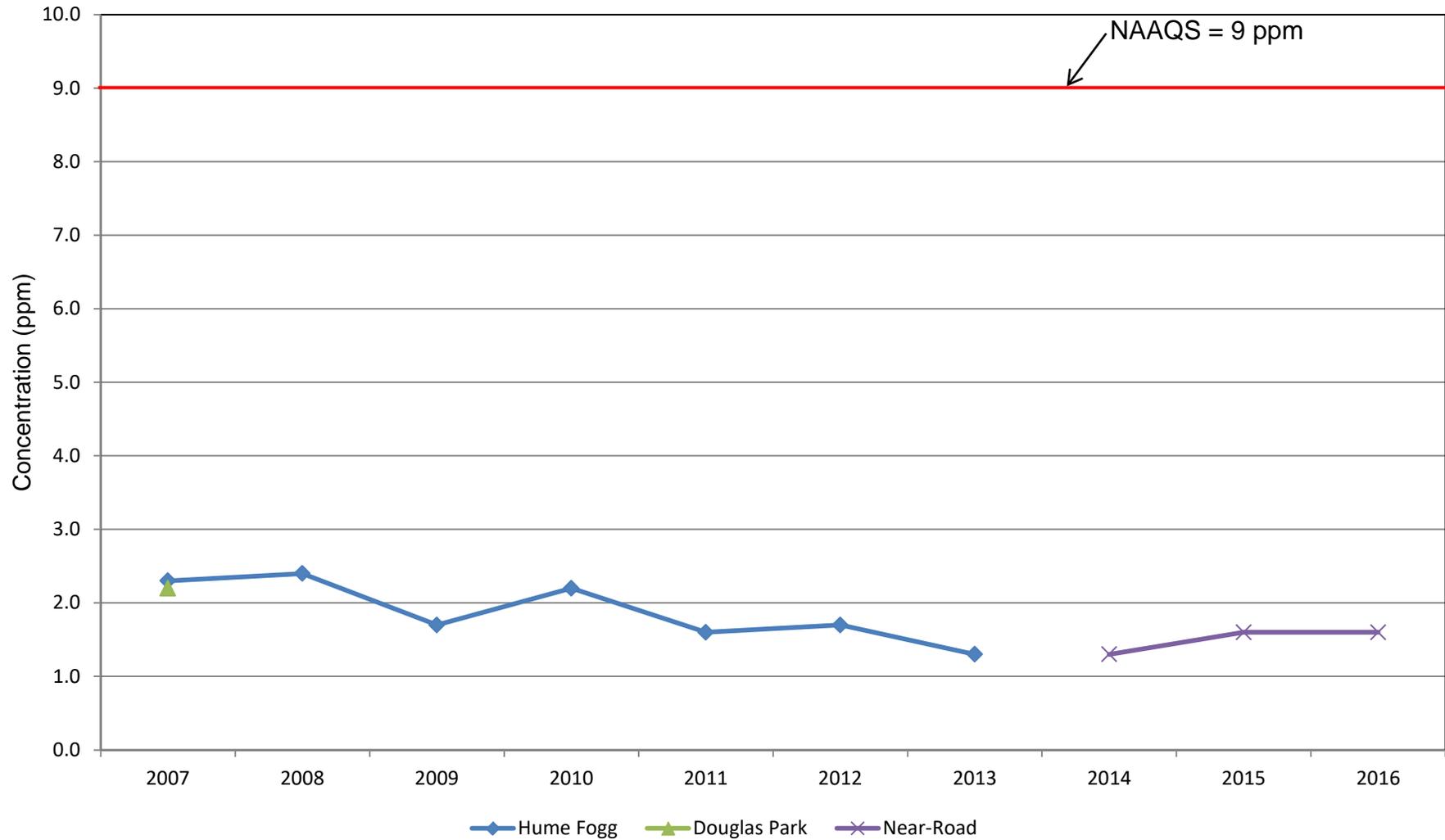
SITE 247-037-0031 DOUGLAS PARK*																			
YEAR	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
Highest 1-Hr Concentration	13.5	9.5	8.5	8.5	8.5	8.0	9.0	6.5	7.0	7.5	7.5	6.7	7.7	6.9	4.9	5.1	4.2	3.9	3.9
2nd Highest 1-Hr Concentration	12.5	9.0	8.5	8.0	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	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	8.3	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
No. of 8-Hr Exceedances of the Standard (9PPM)	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)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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

Annual Comparison of 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_{2.5} and nitrogen dioxide. 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 using data from the continuous monitors located at East Health Center, Lockland Middle School and Percy Priest Dam. 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 www.nashville.gov/Health-Department. Table XXI reflects the daily AQI data that is available on the EPA Air Data website. This data may differ from the daily AQI values reported by this agency due to the fact that EPA calculates the AQI for particulate matter based on the PM_{2.5} manual monitoring data rather the continuous monitoring data.

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.

TABLE XXI 2016 AQI Summary		
Range	Number of Days	% of Total Days
Good	245	72.0%
Moderate	91	26.8%
Unhealthy for Sensitive Groups	4	1.2%

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 the number of days the monitors were in operation. The total number of days in Table XXI does not add up to 366 because there are some days outside of the ozone season when no AQI was calculated, due to monitor maintenance or data verification issues.

Based on the 2016 data, Nashville's air was in the good or moderate range on 98.8% of the days according to EPA's AQI. Therefore, the PCD achieved its performance goal in 2016.

The Davidson County maximum AQI in 2016 was on June 25, 2016 when the ozone concentration resulted in a reported AQI of 126.

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_{2.5}) concentration on the next day. An Air Quality Action Day is called when the predicted ozone or PM_{2.5} 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_{2.5}) 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 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, several radio interviews, on-camera interviews aired on local TV news programs on Air Quality Action Days, and the launch of the Air Quality 101 Workshop series, and the formal launch of the CAP Employer Partner Program, which has grown to reach over 11,000 Middle Tennessee employees. 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, launching a Clean Air Schools program in partnership with the Tennessee Department of Transportation's Clear the Air program, and working with other schools and businesses interested in air quality projects as part of the Tennessee Pollution Prevention Partnership program.

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 www.nashville.gov/Health-Department. It is also available in the Tennessean and during the local television weather broadcasts. Individuals may sign up to receive the air quality forecasts or alerts only via EnviroFlash.

POLLEN

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.

Beginning in 2013, the Metro Public Health Department began obtaining pollen count from the website at www.pollen.com. Airborne pollen is sampled using a system called a “rotorod”, which consists of an array of silicone grease coated clear rods that are exposed to the air and rotated periodically to gather samples throughout an entire 24-hour day. The rods are then examined under a microscope to measure the concentration of pollen grains. The pollen count is then converted to a scale from 0 to 12,

0 to 2.4	Low
2.5 to 4.8	Low-Medium
4.9 to 7.2	Medium
7.3 to 9.6	Medium-High
9.7 to 12	High

Table XXII gives a summary of the 2016 pollen season.

TABLE XXII		
2016 Pollen Count Summary		
Range	Number of Days	% of Total Days
Low	40	15%
Low-Medium	69	27%
Medium	65	25%
Medium-High	51	20%
High	35	13%

7. INDOOR AIR QUALITY

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 2016, the Pollution Control Division responded to 179 telephone calls from the community seeking information and guidance on how to improve their indoor air quality or how to address a particular indoor air situation. 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 cannot 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 (O₃) 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, 2016 through December 31, 2016.

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 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 XXIII.

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.

Table XXIII Maximum Allowable Emissions During Idle Speed (Tailpipe) Test				
Vehicle Model Year	Carbon Monoxide %		Hydrocarbon (PPM)	
	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 2016, the Nashville Vehicle Inspection Program performed 633,681 emission inspections. Compared to the 622,030 inspections performed during 2015, there was an increase of 11,651 inspections, or 1.02 percent.

VEHICLE INSPECTION PASS AND FAIL RATES

In 2016, a total of 572,770 unique vehicles were inspected. The 2016 initial test pass rate was 91.3%, and the initial test fail rate was 8.7%. The initial inspection fail rates rounded to the nearest percent by year since the program start-up can be found in Table XXIV.

TABLE XXIV	
Initial Emission Inspection Fail Rate by Year	
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%
2009	9%
2010	10%
2011	10%
2012	10%
2013	9%
2014	9%
2015	9%
2016	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 fixed test centers and seven mobile (remote) locations as seen in Table XXV.

TABLE XXV Test Center Locations Davidson County, Tennessee	
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
Mobile 1	Rhodes Park – 710 Mainstream Drive
Mobile 2	Joelton Park – 3570 Old Clarksville Pike, Joelton
Mobile 3	Cane Ridge Park – 419 Battle Road, Antioch
Mobile 4	Bellevue YMCA – 8101 Highway 100
Mobile 5	Extra Mobile Test Van
Mobile 6	CarMax – Thompson Lane
Mobile 7	CarMax – Rivergate

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 2016, there were 1,014 gas analyzer audits on 43 gas analyzers used by the test centers. Also, there were 72 covert audits conducted on contractor inspection facilities.

VEHICLE INSPECTION PROGRAM ENFORCEMENT

During 2016, various enforcement activities were carried out to ensure compliance with the vehicle inspection program. The staff issued 196 Notices of Violation and 99 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 2016, the staff attended 4 EPA workshops or training courses. Semi-annually in 2016, the State of Tennessee Visible Emission Evaluation School certified four environmentalists, two engineers, one program coordinator and two vehicle technicians to conduct visible emissions evaluations.

The Pollution Control Division also sold 82 radon test kits to the public.

During 2016, this agency's revenue included:

\$ 373,339	Operating Permits and Emission-based fees
\$ 27,070	Penalties
\$1,886,891	Vehicle Inspection Program