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STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

June 16, 2003

Mr. James I. Palmer, Jr
Regional Administrator, Region 4
U.S. Environmental Protection Agency
61 Forsyth Street
Atlanta, GA 30303-8960

Dear Mr. Palmer:

Re: Memphis MSA Early Action Compact

In accordance with Mississippi's and DeSoto County's commitments to support the Memphis Metropolitan Statistical Area (MSA) Early Action Compact and our commitment to participate in the stakeholder process, we are submitting a list of potential ground-level ozone control measures for evaluation in DeSoto County and the Memphis MSA modeling. The enclosed list of potential control measures has been developed through a stakeholder process. We have not yet seen a list of strategies and measures for the entire Memphis MSA. We understand that the West Memphis Metropolitan Planning Organization (MPO) has submitted a list of recommended strategy options for possible implementation in Crittenden County, Arkansas. In addition, we understand that Memphis/Shelby County has forwarded a list of potential strategies for Shelby County, Tennessee to the Tennessee Air Pollution Control Board. We know of no strategies for Fayette and Tipton Counties in Tennessee. We expect the list of strategies and measures for all of the areas in the MSA to be equivalent to our list. Our list is contingent on that.

Please note that we are not committing to implement any of these strategies at this time. We are considering them and we are prepared to evaluate the effectiveness of these strategies in reducing ground-level ozone in DeSoto County and the Memphis MSA.

The Mississippi Department of Environmental Quality in collaboration with DeSoto County has conducted numerous stakeholder meetings. We are committed to the stakeholder process in the evaluation of potential control measures in DeSoto County.

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If you have any questions, please advise.

Sincerely,

Charles H. Chisolm
Executive Director

Enclosure

cc (w/enclosure): Yvonne Madlock, Director, Memphis/Shelby County Health Department
Diane Arnst, Manager, Pollution Control, Memphis/Shelby County Health Department
Barry R. Stephens, P.E., Technical Secretary, Tennessee Air Pollution Control Board
Becky Keogh, Deputy Director, Arkansas Department of Environmental Quality
Keith Michaels, Chief, Air Division, Arkansas Department of Environmental Quality
J. Carter Gray, Administrator, Memphis/Shelby County Department of Regional Services
Jim McDougal, DeSoto County Planning Commission
Eddie Brawley, P.E., MPO Study Director, West Memphis MPO
Beverly Banister, Director, Air, Pesticides, & Toxics Management Division, U.S.EPA, Region 4
Kay Prince, Chief, Air Planning Branch, U.S.EPA, Region 4

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

List of Potential Control Measures for Evaluation in DeSoto County and Memphis MSA Modeling

Potential Control Measure Descriptor-Stationary Source Measures	Implemented in 2 Years?	Regulation Change Req'd?	Possible Change in Law/Stat. Req'd?	Estimated Emissions Reduction (Tons/Day)
VOC RACT for Major Sources (By 2007)	No	Yes	No	0.35 VOC includes early reductions
Early Implementation of VOC RACT for Major Sources (By 2005)	Yes	Yes	Yes	0.35 VOC
NOx RACT for Major Sources (By 2007)	No	Yes	No	0.7 NOx includes early reductions
Early NOx Reductions for Major Sources (By 2005)	Yes	Yes	Yes	0.45 NOx
NOx RACT for Major Sources in Adjoining Counties (By 2007)	No	Yes	No	3.64 NOx includes early reductions
Early NOx Reductions for Major Sources in Adjoining Counties (By 2005)	Yes	Yes	Yes	2.0 NOx
Changing open burning regulations to prohibit open burning on Ozone Action Days	Yes	Yes	Yes	0.35 NOx 0.81 VOC
Stage I Vapor Recovery (By 2007)	No	Yes	No	1.0 VOC
Early Implementation of Stage I Vapor Recovery (By 2005)	Yes	Yes	Yes	1.0 VOC
Potential Control Measure Descriptor-Mobile Source Measures	**Implemented in 2 Years?**	**Regulation Change Req'd?**	**Possible Change in Law/Stat. Req'd?**	**Estimated Emissions Reduction (Tons/Day)**
Idling Limits (e.g., an Anti-idling law) for diesel engines	Yes	Yes	Yes	0.3 NOx
Cooperate with Memphis on Remote Sensing of Emissions Violators in Mobile Sources	Yes	No	No	0.12 NOx 0.3 VOC
Low RVP Fuels (in cooperation with Memphis—if available)	Yes	Yes	Yes	0.1 VOC
Tier II or Ultra-Low Sulfur Gasoline (in cooperation with Memphis—if available)	Yes	Yes	Yes	5.0% NOx 1.6% VOC
Various Transportation Related Air Quality improvements financed through directed state CMAQ funds to DeSoto County , such as Park & Ridelots, ITS Enhancements and Signalization Systems	No	No	No	0.011 NOx (signal) 0.01 VOC (signal) 0.047 NOx (ridelots)
Development of the more strategic pedestrian and biking programs in DeSoto County that would "connect" Memphis-area biking and pedestrian paths for contiguous travel (assume: 1000 bikers)	No	No	No	0.01 NOx(bike) 0.002 NOx(walk)
Continuation of the High Occupancy Vehicle (HOV) Lanes on I-55 from the Tennessee state line south to the Goodman Road exit in Mississippi (2 lanes –northbound and southbound)	No	No	Yes	0.02 NOx 0.03 VOC
Potential Control Measure Descriptor-Voluntary Measures	**Implemented in 2 Years?**	**Regulation Change Req'd?**	**Possible Change in Law/Stat. Req'd?**	**Estimated Emissions Reduction (Tons/Day)**
Ozone Action Days	Yes	No	No	3% Claimed for All Voluntary Measures
Stationary Source Voluntary Measures on Ozone Action Days	Yes	No	No	
MDOT/County Road Reductions on Ozone Action Days (e.g., delay of lawn maintenance activities, open burning, et cetera)	Yes	No	No	
Voluntary Program for Limiting Idling-Time of Diesel Engine Fleets and Distribution Centers	Yes	No	No	
Rideshare program	Yes	No	No	