UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 16 2003

Mr. Eddie Terrill, Director
Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Mr. Terrill:

I am pleased to inform you that we received your letter dated June 4, 2003, forwarding the list of potential control measures for Tulsa, Oklahoma. The first important milestone under the 8-hour Ozone Early Action Compact program is to identify and describe local control measures being considered during the local planning process by June 16, 2003. Your list of potential control measures was received on time and meets the milestone requirement specified in the *Compact* guidance issued by Assistant Administrator Jeff Holmstead on November 14, 2002.

The U.S. Environmental Protection Agency recognizes that the 8-hour Ozone Early Action Compact program is ongoing and that the Oklahoma Department of Environmental Quality, in partnership with the local communities, continues to make good progress. We appreciate your commitment to the *Compact* program and to achieving cleaner air sooner. My staff and I are always available to assist you as we work together towards that goal.

Should you have any questions, please feel free to call me or Mr. Thomas Diggs of my staff at (214) 665-7214.

Sincerely yours,

Richard E. Greene
Regional Administrator

cc: Mr. Jerry Lasker
Indian Nations Council of Governments

June 4, 2003

Richard E. Greene 6RA
Regional Administrator
USEPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Greene:

On behalf of the Indian Nation Council of Governments and the Oklahoma Department of Environmental Quality, please find enclosed a list and description of candidate local control measures that may be considered for future modeling and possible implementation for the Tulsa Early Action Compact (EAC). This submittal is made to meet the June 16, 2003, EAC milestone requirement.

These measures were selected through stakeholder involvement at a series of workgroup and public meetings (see attachments). They were evaluated considering numerous factors including political, geographic and economical constraints, their feasibility of implementation, and their range of potential emission reductions. We understand that any final control strategy chosen may include, but would not be limited to, these candidate measures. We plan that some of these potential control measures be more fully evaluated during the upcoming months.

We appreciate the opportunity to participate in the EAC process as a means of achieving and maintaining the 8-hour ozone standard for the Tulsa area. If you have any questions concerning this submittal, or desire further information, please contact Scott Thomas of my staff at (405) 702-4157.

Sincerely,

Eddie Terrill
Division Director
Air Quality Division

cc: Tom Diggs, EPA Region 6
Jerry Lasker, INCOG
Scott Thomas, DEQ

ET:dgc

Enclosures (2)

Control Measure Development Schedule for Tulsa EAC Area

- **December 31, 2002**

  EAC signed by all parties
- **April 10, 2003**

  INCOG Air Quality Committee Meeting
- **April 17, 2003**

  INCOG AQ AdHoc Technical Committee Meeting
- **May 1, 2003**

  INCOG Air Quality Committee Meeting
- **May 27, 2003**

  Technical Advisory Committee meeting/ Public Meeting
- **June 16, 2003**

  Preliminary list of local control measures to EPA

List of Potential Control Strategies

For the June 16, 2003 Milestone of the Tulsa Area Early Action Compact Agreement

CATEGORY	STRATEGY	EMISSION REDUCTION TYPE	DESCRIPTION	GEOGRAPHIC AREA (EAC Region; Specific Area / Source(s) to be Determined; Statewide)
FUELS				
	Stage I Vapor Recovery	VOC	Recovering hydrocarbon vapors generated when gasoline is transferred from a gasoline tank truck into a stationary storage tank at a dispensing facility. Usually 90% of these vapors can be reclaimed. The equivalent to Stage 1 vapor recovery is currently required in Tulsa County (OAC 252:100-39-41(e)) and could be revised to cover other areas of the State or the entire State. Up to 90% VOC reduction.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Stage II Vapor Recovery	VOC	Recovering gasoline hydrocarbon vapors which escape during motor vehicle refueling at dispensing stations.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Modification of Fuel blends	VOC	Modification of fuel blends that may include, but would not be limited to, the following: Federal Reformulated (RFG) Gasoline; Low Reid Vapor Gasoline (7.8 psi or better); Speeding up the sulfur removal in gasoline; Diesel fuel low sulfur options; Improvement of diesel fuel Cetane levels.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
MOBILE				
	Clean Fleet Program	VOC and NOx	Implementing a Clean Fleet vehicle program that may include, but would not be limited to, the following: Implementing the Federal Clean Fleet Program which requires percentages of government and private fleets to purchase low emission vehicles when adding or replacing vehicles in their fleet.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Idling Strategies	VOC and NOx	Imposing idling restrictions that may include, but would not be limited to, the following: Motor vehicles with a gross vehicle weight rating of greater than 14,000 pounds to restrict engine idling to five (5) consecutive minutes in the Oklahoma City and/or Tulsa MSAs; Prohibition on engine idling in parking lots; Restrict or prohibit drive through window operation on Ozone Alert! Days; Restrict or prohibit engine idling at airport curbsides; and Electrification of truck stops.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Vehicle	VOC and NOx	Implement vehicle inspection and maintenance program	EAC Region; Specific

CATEGORY	STRATEGY	EMISSION REDUCTION TYPE	DESCRIPTION	GEOGRAPHIC AREA (EAC Region; Specific Area / Source(s) to be Determined; Statewide)
	Inspection and Maintenance Program (I/M)		(I/M) that may include, but would not be limited to, the following: Visual anti-tampering inspections; Tailpipe emissions testing; a Diesel Flash Program; and Other emission maintenance inspections programs. Up to 50% VOC reduction.	Area / Source(s) to be Determined; Statewide
	Traffic Patterns-Re-routing of trucks (large commercial motor vehicles)	VOC and NOx	To reduce ozone precursors, trucks and large commercial motor vehicles can be rerouted or restricted by various strategies that may include, but would not be limited to, the following: Bypass/through truck routes; Intra-city circulation truck routes; and Prohibition of truck movements.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Various Transportation Control Measures	VOC and NOx	Implement various transportation control measure strategies that may include, but would not be limited to, the following: Traffic flow improvements; Mass transit programs, Carpooling and other trip reduction programs; and Intelligent transportation messaging systems.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Speed Limit Reductions	VOC and NOx	To aid ozone reduction in the metropolitan areas, local speed limit reductions and/or enforcement can be implemented through action of the Oklahoma Transportation Commission (OTC). Speed limit reductions for ozone reduction purposes will only be considered by the OTC upon local government and MPO request.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
AREA				
	NOx Reductions for new gas-fired water heaters, small boilers and process heaters	NOx	Implementing NOx reduction programs that may include, but would not be limited to, the following: Requiring NOx emission reduction from new natural gas-fired water heaters, small boilers and process heaters sold and installed. Potential application could be for each new water heater, boiler or process heater with a maximum rated capacity of up to 2.0 MMBtu/hr.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Glycol Dehydrators	VOC	Implementing Glycol Dehydrators that may include, but would not be limited to, the following: Requiring installation of condensers or other controls on select glycol dehydration units with the potential to emit beyond a defined limit. Glycol dehydration units remove water from natural gas streams to prevent the formation of hydrates and corrosion in pipelines.	EAC Region; Specific Area / Source(s) to be Determined; Statewide

CATEGORY	STRATEGY	EMISSION REDUCTION TYPE	DESCRIPTION	GEOGRAPHIC AREA (EAC Region; Specific Area / Source(s) to be Determined; Statewide)
	Natural Gas Compressor Engines Modifications	NOx	To reduce NOx emissions from pipeline compressor station motors, this strategy would identify and modify select natural gas engines. Options include engine conversions; catalysts; and sending natural gas to a combined-cycle power plant to generate electricity and transmit it back to the pipeline compressor.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Airport Reductions	VOC and NOx	Implement airport emission reduction programs that may include, but would not be limited to, the following: Taxi dispatch; Idling restrictions; Engine maintenance; Land maintenance; Electrification of tugs and other vehicles used in the airport's operations; emission reduction options for aircraft engine testing (static and actual take-off and landing); and Baggage handling and ground support equipment	EAC Region; Specific Area / Source(s) to be Determined; Statewide
STATIONARY				
	Electric Generating Facilities, Gas Turbines; Major NOx emitter strategies	NOx	The purpose of the strategy is to reduce overall background levels of ozone to assist in keeping ozone attainment and near non-attainment areas in compliance with federal ozone standards. The following NOx reduction strategies could be adopted for specific areas of Oklahoma as part of the EAC SIP submittal, and may include, but would not be limited to: Combustion control emission reduction strategies from electric utility and gas turbine facilities; Emission reduction strategies from other major NOx emission stationary sources. Up to 30% NOx reduction.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Emissions Cap and Trade Program	VOC and NOx	Implementation of a NOx and VOC Cap and Trading Program, providing for emission allowances and emission reduction requirements. The trading of these allowances would take place under an area-wide cap on NOx and/or VOC emissions established under the SIP.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Expand Existing Non Attainment Requirements	VOC	Currently the requirements in state DEQ air regulation OAC 252:100-39 applies only to what were once the former nonattainment areas. This rule contains additional requirements for control of VOCs from: petroleum refining operations; petroleum processing and storage; cutback asphalt; storage, loading and transport of VOCs; metal cleaning; graphic arts systems; manufacture of pneumatic rubber tires; petroleum dry cleaning;	EAC Region; Specific Area / Source(s) to be Determined; Statewide

CATEGORY	STRATEGY	EMISSION REDUCTION TYPE	DESCRIPTION	GEOGRAPHIC AREA (EAC Region; Specific Area / Source(s) to be Determined; Statewide)
			coating of parts and products; aerospace industries coating operations; vapor recovery systems; and manufacturing of fiberglass reinforced plastic products. These additional requirements could be expanded to be applicable in other areas of the State.	
	Industrial Boilers and process heaters	VOC and NOx	Area source NOx and VOC emission reduction strategies that may include, but are not limited, to reductions from industrial boilers and process heaters.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
INNOVATIONS				
	Control Clauses for Construction Contracts	VOC and NOx	Oklahoma federal, state and municipal contracts could require bidders to agree to specifications that address ozone formation. Example specification could include: • Lane Closures; • Observation of Ozone Alert Days; • Carpooling; Night construction projects; Proportional use of alternative fuel vehicles	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Wind or other renewable energy	VOC and NOx	This strategy would promote wind power/renewable energy as a means for emissions reductions of ozone precursors. Legislation or binding contracts could require a government or municipality to purchase/use renewable energy. (Senate Joint Resolution 8 is a voluntary program for electric providers to increase their production of electricity from renewable sources to 1% by 2004 and 1% per year up to 8% in 2011.)	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Financial Incentives	VOC and NOx	Implementation of various economic incentive programs that may include, but would not be limited to a Clean Air Investment Fund.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
LAND USE ACTIVITIES				
	Urban Heat Island Reduction Measures	VOC and NOx	Implementation of Urban Heat Island reduction measures that may include, but would not be limited to the following: Green Roof Technology; and Cool City programs.	EAC Region; Specific Area / Source(s) to be Determined; Statewide
	Agriculture	VOC and NOx	Implement agriculture process emission reduction	EAC Region; Specific

CATEGORY	STRATEGY	EMISSION REDUCTION TYPE	DESCRIPTION	GEOGRAPHIC AREA (EAC Region; Specific Area / Source(s) to be Determined; Statewide)
	Process Emission Reductions		programs that may include, but would not be limited to, the following: Urban area lawn and garden fertilizer application control programs limiting/restricting nitrogen fertilizer application on Ozone Alert! Days; and Various restrictions and agriculture management controls to reduce NOx and VOC emissions from agriculture processes on Ozone Alert! Days.	Area / Source(s) to be Determined; Statewide
	Lawn and garden gasoline powered engine controls	VOC and NOx	Implementation of various gasoline powered lawn and garden emission reduction control strategies that may include, but would not be limited to, the following: 2-cycle engine restriction programs; lawn-mower trade-in programs.	EAC Region; Specific Area / Source(s) to be Determined; Statewide