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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

November 8, 2011

Gwen Keyes Fleming
Regional Administrator
US EPA, Region IV
Sam Nunn Atlanta Federal Center, 12th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-3104

RE: Tennessee's Revised Designation Recommendations for the 2008 Ozone NAAQS (75 ppb)

Dear Administrator *Gwen* Fleming:

On March 10, 2009, the state of Tennessee sent EPA a letter recommending attainment/nonattainment boundaries for the 2008 Ground Level Ozone NAAQS of 75 ppb. This recommendation was based upon a review of 2006-2008 monitoring data. EPA tabled action on the state recommendations and recently announced that it would resume implementation of the 75 ppb standard. EPA is currently considering the March 10, 2009 recommendations and the 2008-2010 monitoring data to make its proposed boundary determinations and begin the 120 day consultative period with states, but said it would consider 2011 data if it was submitted as soon as it could be certified.

Tennessee wishes to modify its March 10, 2009 recommendation based upon 2009-2011 monitoring data (attachment #1). Because of the compressed time period to submit the recommendations with 2011 data, Tennessee is sending this letter now and will follow with a technical support document in the next few weeks.

Tennessee's revised recommendation is as follows:

Knoxville Area:

Partial Counties of Blount, Cocke & Sevier that comprise the Great Smoky Mountains National Park – nonattainment
Rest of Blount, Cocke & Sevier Counties – attainment

Each of the remaining counties in the state of Tennessee that are not described in the above table should be designated attainment. The portions of the counties that comprise the Tennessee side of the Great Smoky Mountains National Park are recommended as nonattainment for monitoring data obtained at the Look Rock monitoring site in Blount County and Clingman's Dome monitoring site in in Sevier County. There are no monitoring sites in Cocke County. These two sites are elevated monitoring sites at 2,603 feet and 6,634 feet respectively. The technical support document to follow will argue that these sites are influenced primarily by transport from

afar, and only minimally influenced by local conditions of the area in which they are located. For initial comparison, Knoxville has an average elevation of about 900 feet.

Tennessee appreciates the opportunity to make this revised recommendation. We estimate our 2011 (attachment #2) data will be entered into AQS no later than November 30, 2011 and will be certified no later than mid December 2011. If you or your staff have questions pertaining to this recommendation, please contact our air pollution control division director, Barry R. Stephens, P. E. His contact information is as follows: Barry.Stephens@tn.gov; (615) 532-0525.

Sincerely,

A handwritten signature in black ink, reading "Robert J. Martineau, Jr.", with a large, stylized flourish extending to the right.

Robert J. Martineau, Jr.
Commissioner

Cc: Tennessee Air Pollution Control Board Members
Tennessee Local Air Pollution Control Agencies
Division of Air Pollution Control
Beverly Banister, EPA Region IV
Scott Davis, EPA Region IV
Lynorae Benjamin, EPA Region IV

Attachments: 1 Preliminary Tennessee Ozone Data 2009 – 2011
2 2011 Preliminary Summary

Attachment # 1

Preliminary Tennessee Ozone Data for 2009 - 2011

County	Site Name	MONITOR ID	Preliminary 2011 4th Max.	Preliminary 2009 2011 DV> 0.075 PPM	2011 4th Max Needed for 8 Hr DV Violation (>0.075 PPM)
Anderson Co	Freels Bend_Study Area Melton Lake	470010101 - 1	0.074	0.071	0.089
Blount Co	Great Smoky Mountains Np Look Rock	470090101 - 1	0.082		0.077
Blount Co	Great Smoky Mountains Np - Cades Cove	470090102 - 1	0.068	0.068	0.091
Davidson Co	1015 Trinity Lane	470370011 - 1	0.066	0.064	0.1
Davidson Co	Percy Priest	470370026 - 1	0.072	0.068	0.095
Hamilton Co	Volunteer Army Ammunition Plant	470654003 - 1	0.074	0.074	0.08
Hamilton Co	Ridgetrail Rd.	470651011 - 1	0.074	0.072	0.085
Jefferson Co	1188 Lost Creek Rd	470890002 - 1	0.073	0.073	0.08
Knox Co	9315 Rutledge Pike Mascot Tn 37806	470930021 - 1	0.074	0.070	0.091
Knox Co	4625 Mildred Drive	470931020 - 1	0.074	0.072	0.085
Loudon Co	1703 Roberts Rd	471050109 - 1	0.075	0.073	0.084
Meigs Co	8401 Highway 60	471210104 - 1	0.074	0.072	0.086
Rutherford Co	Eagleville Puckett'S Farm	471490101 - 1	0.067	0.068	0.091
Sevier Co	Great Smoky Mountain Np Cove Mountain	471550101 - 1	0.077		0.078
Sevier Co	Clingsmans Dome, Great Smoky Mtns. Np	471550102 - 1	0.079		0.079
Shelby Co	1330 Frayser Blvd	471570021 - 1	0.079	0.075	0.082
Shelby Co	6855 Mudville Rd. Edmond Orgill Park	471571004 - 1	0.077	0.073	0.084
Sullivan Co	Hill Road	471632002 - 1	0.074	0.071	0.089
Sullivan Co	Ketron Middle School On Bloomingdale Rd.	471632003 - 1	0.071	0.070	0.088
Sumner Co	Rockland Recreation Area-Old Hickory Dam	471650007 - 1	0.077		0.079
Sumner Co	Cottontown Wright's Farm	471650101 - 1	0.076	0.071	0.09
Williamson Co	Fairview Middle School Crow Cut Road	471870106 - 1	0.072	0.070	0.09
Wilson Co	Cedars Of Lebanon State Park	471890103 - 1	0.073	0.071	0.086
Christian	Hopkinsville	210470006 - 1	0.07	0.070	0.087
DeSoto	5 East South	280330002 - 1	0.073	0.073	0.08
Crittenden	Marion	050350005 - 1	0.082		0.078

Update

Date

Updated by ERB

11/3/2011

Modified last column for >.075 stats 10/6/11

0.061

and higher

0.066

and higher

0.071

and higher

Preliminary 2011 Ozone Exceedance Data (8 Hr (079) \1 Hr Counts) as of Oct 31, 2011

DATE	Memphis MSA					Clarksville		Nashville MSA					Chattanooga MSA			Greater Knoxville					Great Smoky Mtn				Tri-Cities					
	Edmond Orgill	Frapper	Hernando, MS	Crittenden Marion, AR	Shelby Farms	Hop, KY	TVA - Cadiz	Fairview	Eagleville	Cedars of Lebanon	Cottonwood	Percy Priest	East Nashville	Hendersonville	Sequeoyah	Meigs	Annex Plant	Cedar Cove	Spring Hill	Jefferson New Market	East Knoxville	Lodson	Oak Ridge	Clingman's Dome	Cove Mountain	Look Rock	Purchase Knob, NC	Blountville	Kingsport	
6/1/11			78																											
6/2/11				83																										
6/3/11																														
6/4/11			78																											
6/6/11																														
6/7/11			77																											
6/8/11																														
6/11/11																														
6/14/11				78	81																									
6/15/11																														
6/16/11																														
6/30/11				80																										
7/1/11			78	90	85																									
7/2/11			79	82	85																									
7/3/11			95	90	77																									
7/5/11																														
7/9/11				81																										
7/11/11					78																									
7/13/11																														
7/28/11				80																										
8/2/11			89	78																										
8/3/11			77		85																									
8/12/11					77																									
8/16/11					89																									
8/17/11			77																											
8/18/11																														
8/28/11																														
8/30/11				86																										
8/31/11			80																											
9/1/11			89	83																										
9/2/11																														
9/3/11					81																									
9/13/11			76																											

30

- Unhealthy for Sensitive Groups - 8 Hour exceedance monitored at this site and concentration in ppb reported.
 - Unhealthy - 8 Hour exceedance monitored at this site and concentration in ppb reported.
 - Site operated by another state on the border of Tennessee (not inside of Tennessee).
 - 8 Hour/1 Hour exceedance reported (> 125 ppb ozone).
 - 108/139
- Preliminary data indicates that there has been 30 day(s) in 2011 on which the 8 hour ozone standard (079) was exceeded by at least one monitoring site in Tennessee.