



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

ROBERT J. MARTINEAU, JR.  
COMMISSIONER

BILL HASLAM  
GOVERNOR

May 26, 2011

Gwendolyn Keyes Fleming  
Regional Administrator  
US EPA, Region IV  
Sam Nunn Atlanta Federal Center, 12<sup>th</sup> Floor  
61 Forsyth Street, SW  
Atlanta, GA 30303

RE: Tennessee's 2011 Sulfur Dioxide Designations Recommendations

Dear Ms. Fleming:

As the Commissioner of the Tennessee Department of Environment and Conservation and on behalf of Governor Bill Haslam, I am submitting the recommended sulfur dioxide ambient air quality designations for Tennessee as required by section 107 of the Clean Air Act for the 2011 primary sulfur dioxide standard.

The designation recommendations below are based on the most current sulfur dioxide monitoring data (2008-2010) along with the EPA's March 24, 2011 guidance document "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards." This guidance recommends that states use the five-factor analysis for designations, taking into consideration available modeling data and using the county in which a non-attaining monitor is located as a starting point. Under this guidance, the following areas in Tennessee are recommended as nonattainment for the revised primary sulfur dioxide national ambient air quality standard.

**Tri-Cities Area**  
Sullivan County

**Calhoun-Charleston Area**  
Bradley and McMinn Counties \*

- \* Tennessee recommends that Bradley and McMinn counties be partially designated nonattainment for the portions of the counties limited to a circle centered on Universal Transverse Mercator (UTM) coordinate 703.927 kilometers E, 3908.144

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kilometers N, with a radius of 2.0 kilometers. This area encompasses a pulp and paper mill that is the primary source of sulfur dioxide emissions in the two county areas.

The remaining counties of Tennessee and the remaining portions of Bradley and McMinn Counties that are not specified above are recommended as attainment or unclassifiable. While these counties will not be designated as nonattainment, they may be subject to additional control measures that will help all of Tennessee demonstrate attainment of the 1-hour standard.

I believe these recommendations will enable Tennessee to attain the sulfur dioxide standard within the deadlines established by the Clean Air Act and its implementing regulations.

Your favorable review of these recommendations will be appreciated. Additional information used to formulate the recommendations will be forwarded to you under separate cover by our Air Pollution Control Division Director, Barry R. Stephens. These recommendations may be revised as additional information becomes available. We are available to discuss these recommendations with you and your staff.

Sincerely,



Robert J. Martineau, Jr., Commissioner  
Department of Environment and Conservation

RJM/ebs

cc: Beverly H. Banister, Director  
Air, Pesticides and Toxics Management Division, EPA Region IV  
Dick Schutt, Chief, Air Planning Branch, EPA Region IV  
Tennessee Air Pollution Control Board  
Tennessee Local Air Programs