



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

JAMES H. FYKE
COMMISSIONER

PHIL BREDESEN
GOVERNOR

Via UPS EXPRESS

October 20, 2008

Mr. James I. Palmer, Jr.
Regional Administrator
US EPA, Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: Tennessee's Response to EPA's Recommended PM_{2.5} Nonattainment Designations

Dear Mr. Palmer:

As the Commissioner of the Tennessee Department of Environment and Conservation, I am designated to file the recommended annual and 24-hour attainment designations for Tennessee as required by the Clean Air Act. Tennessee offers the following comments regarding the PM_{2.5} nonattainment designations recommended by the Environmental Protection Agency (EPA) as outlined in EPA's August 19, 2008, letter to Governor Bredesen. Current data trends indicate attainment to be achieved by all counties and partial areas described in this letter.

Knox, Anderson, Blount, Loudon, and Roane Counties

Tennessee accepts the proposed Greater Knoxville area boundaries, as described in the aforementioned letter, under one condition: EPA should not determine final designation of the Knoxville area boundaries until all data flag requests have been resolved. A number of flags have been requested yet no replies have been issued. Even if none of the flags are approved, Knox, Anderson, Blount, Loudon, and Roane counties are very likely to achieve attainment, based on 2006 through 2008 design values. Tennessee will submit 2008 data when it has been certified. The Tennessee Valley Authority (TVA) will have scrubbers online at Bull Run Fossil Plant by the end of 2008 and, in two phases, at the Kingston Fossil Plant in 2009 and 2010.

Montgomery County

Montgomery County should be classified as "unclassifiable" by the December 18, 2008, deadline, and monitoring data support our declaration that Montgomery County will measure attainment. Ambient PM_{2.5} data for 2007 may be skewed by the impact of Georgia and Florida wildfires during 2007. The preliminary PM_{2.5} 98th percentile value from January 1, 2008, to September 30, 2008, is 28.1 µg/m³. For Montgomery County to even violate the standard, the 98th percentile concentration would have to be at 36.8 µg/m³. In addition, projection through the end of 2008 indicates the design value for 2006 through 2008 would be 32.6 µg/m³, well below the 24-Hour PM_{2.5} standard of 35 µg/m³. Data for 2008 will be certified before the February, 2009, deadline to have these measurements considered.

October 20, 2008

Humphreys and Stewart Counties

Stewart County and Humphreys County should be classified as "attainment." However, if EPA moves forward to designate Montgomery County nonattainment with respect to the 24-Hour PM_{2.5} NAAQS, and if EPA determines that Humphreys and Stewart Counties are also nonattainment, then EPA should designate only significantly contributing portions of Humphreys and Stewart Counties.

EPA has proposed to designate Humphreys and Stewart Counties in their entirety as PM_{2.5} nonattainment areas, even though only Stewart County is located within the Clarksville, Tennessee metropolitan statistical area (MSA). EPA has previously concluded that a partial area of a county may be designated nonattainment if that partial area includes the point of concern. Tennessee believes this same situation exists for both counties of Humphreys and Stewart, if both are non-attaining.

The primary sources of concern are two coal-fired power plants: the TVA New Johnsonville Fossil Plant in Humphreys County and TVA Cumberland Fossil Plant in Stewart County. The proposed boundaries for the partial areas that include these power plants are census block groupings as listed in Table 1 and mapped in Attachment 1 (Humphreys County) and Attachment 2 (Stewart County). If EPA determines that Humphreys and Stewart Counties must be designated as nonattainment, the EPA should designate only the census block groupings indicated in Table 1 and the attachments.

Table 1: Census Block Groups

<i>County</i>	<i>Census Block Groups</i>
Humphreys	1070 (up to the northern boundary of the right-of-way U.S. 70), 1071, 1072, 1073, 1074
Stewart	2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043

At each of the TVA power plants, SO₂ and NO_x emissions continue to decline, and any further control methodologies would be federally enforceable through operating permit conditions and continued NO_x SIP Call provisions within Tennessee Air Pollution Control Regulations. As stated in TVA's letter to EPA, dated October 1, 2008, TVA Cumberland Fossil Plant in Stewart County has two combustion units with each unit's emissions controlled with low-NO_x burners, selective catalytic reduction, electrostatic precipitators, and wet limestone scrubbers. Also, the TVA Johnsonville Fossil Plant in Humphreys County continues to utilize electrostatic precipitators and selective non-catalytic reduction as emission controls on all ten units.

In conclusion, Tennessee appreciates your time to assist us to preserve air quality in the Knoxville and Clarksville areas while moving forward with growth and development opportunities on behalf of the citizens we serve.

Sincerely,


 James H. Fyke
 Commissioner

ATTACHMENT 1

Census Block Groupings for Humphreys County, TN

Humphreys Co. TVA Facility



STATE	COUNTY	TRACT	BLKGRP	BLOCK	AREALAND	TOTALPOP
47	85	130500	1	1070	2439335	0
47	85	130500	1	1071	387357	0
47	85	130500	1	1072	64337	0
47	85	130500	1	1073	7286	0
47	85	130500	1	1074	4473	0

ATTACHMENT 2

Census Block Groupings for Stewart County, TN

Stewart Co. TVA Facility

Dashed Line Represents Proposed N/A Boundary Inside of the Listed Census Blocks



STATE	COUNTY	TRACT	BLKGRP	BLOCK	AREA LAND	TOTAL POP
47	161	110600	2	2031	14794	0
47	161	110600	2	2032	493459	0
47	161	110600	2	2033	10098	0
47	161	110600	2	2034	12069	0
47	161	110600	2	2035	30458	0
47	161	110600	2	2036	11793	0
47	161	110600	2	2037	22600	0
47	161	110600	2	2038	16405	0
47	161	110600	2	2039	241260	0
47	161	110600	2	2040	47013	0
47	161	110600	2	2041	5313	0
47	161	110600	2	2042	807241	0
47	161	110600	2	2043	521715	0