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

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DEPT. OF ENV. & CON.
GENERAL COUNSEL

July 14, 2003

J.I. Palmer, Jr.
Regional Administrator
US EPA, Region IV
Atlanta Federal Center, 12th Floor
61 Forsyth Street, SW
Atlanta, GA 30303

RE: Clean Air Act
Tennessee Counties Recommended as Nonattainment for Ozone

Dear Mr. Palmer:

As the Commissioner of the Tennessee Department of Environment and Conservation, I am designated to file the recommended eight-hour ozone attainment designations for Tennessee as required by the Clean Air Act. Based upon EPA's Designation Boundary Guidance of March 28, 2000, the following counties are recommended as nonattainment for the eight-hour ozone national ambient air quality standard:

Memphis Area
Shelby

Haywood County

Putnam County

Middle Tennessee Area
Sumner, Davidson, Wilson, Williamson and Rutherford

Chattanooga Area
Hamilton and Meigs

Knoxville Area
Anderson, Knox, Loudon, Jefferson, Sevier* and Blount*

Tri-Cities Area
Sullivan and Washington

* Tennessee does not believe that air quality conditions measured at the high elevation sites in these counties is indicative of air quality conditions at the low elevation sites of the region. We believe there should be two separate designations of nonattainment in these counties based upon low elevation versus high elevation. A detailed explanation of this belief will be included in a technical support document being sent under separate cover. It is recommended that EPA make separate nonattainment designations for:

- *Clingman's Dome* – The monitoring site is located atop Clingman's Dome and used to gauge conditions in the Great Smoky Mountains National Park (GSMNP), a Class I Area. Elevation of the site is 6,630 feet.
- *Look Rock* – The monitoring site is located atop Chilhowee Mountain and also in the GSMNP. Elevation of the site is 2,602 feet.
- *Cove Mountain* – The monitoring site is located atop Cove Mountain and also in the GSMNP. Elevation of the site is 4,078 feet.

EPA is currently in the process of preparing a rule to be used in implementing the new eight-hour ozone standard. Because this guidance has not been finalized by EPA, Tennessee reserves the right to make an amended recommendation after reviewing the EPA implementation rule once it becomes final.

The remaining counties of Tennessee that are not specified above are recommended as attainment or unclassifiable, and will be subject to additional control measures that will help all of Tennessee demonstrate attainment of the eight-hour ozone standard.

Tennessee is participating in the Arkansas, Tennessee, Mississippi Ozone Study (ATMOS) to identify the measures and extent of control needed to attain the standard. Your staff has been involved in this project since its inception and can attest to the credibility of the work. The extent of statewide control measures will be determined in the near future using the information developed in the ATMOS study.

I believe these recommendations will enable Tennessee to attain the ozone standards within the deadlines established by the Clean Air Act and its implementing regulations. In fact, because of the Early Action Compact process entered into by Tennessee, its local governments and EPA, we should achieve attainment much sooner.

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.

Sincerely,

Betsy Child

Betsy L. Child

Copy to: Kay Prince, EPA Region IV
Tennessee Air Pollution Control Board
Tennessee Local Air Programs