



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

JAMES H. FYKE
COMMISSIONER

PHIL BREDESEN
GOVERNOR

January 12, 2011

Ms. Gwendolyn Keyes Fleming
Regional Administrator
US EPA Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Clean Air Act
Tennessee Nonattainment Area Recommendation for 2010 Nitrogen Dioxide NAAQS

Dear Administrator Fleming:

The State of Tennessee recommends all of Tennessee's counties should be designated as attainment/unclassifiable for the new short term primary National Ambient Air Quality Standard for Nitrogen Dioxide (1-hour standard of 100 ppb, based on the 3-year average of the 98th percentile of the yearly distribution of 1-hour daily maximum concentrations), that became effective April 12, 2010, as published in Federal Register / Vol. 75, No. 26 / Tuesday, February 9, 2010.

All counties in Tennessee are currently classified as attaining the current long term annual nitrogen dioxide (NO₂) standard of 53parts per billion (ppb).

This recommendation is based upon an evaluation of the most recent three years of data available (2007 to 2009). Tennessee is making these recommendations at this time to satisfy the January 25, 2011 designation schedule timeline (one year after the revision to the NAAQS (National Ambient Air Quality Standards)). The attached table details the monitoring data for Tennessee upon which the recommendations are based. Although the design values presented are not generated from "near road" monitoring sites, they do represent current air quality for the areas specified. Tennessee proposes to collect sufficient data as needed from properly located and operated "near road" nitrogen dioxide monitoring sites to accurately assess compliance with the new short term "near road" NO₂ standard after EPA promulgates the final siting criteria for "near road" NO₂ monitoring.

I believe these recommendations provide EPA with the information necessary to confirm that Tennessee is currently attaining the nitrogen dioxide standard within the deadlines established by the Clean Air Act and its implementation regulations.

Administrator Fleming

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Your favorable review of these recommendations will be appreciated. If you should need additional information please feel free to contact our Air Pollution Control Division Director, Barry R. Stephens.

Sincerely,



Paul L. Sloan

Deputy Commissioner

PS:qs

cc: Beverly Banister, Air Division Director
Dick Schutt, Chief Air Planning Branch
Tennessee Air Pollution Control Board
Tennessee Local Air Pollution Control Programs

Tennessee Table of Nitrogen Dioxide Recommendations, Jan. 22, 2010 NO2 Std. (3-year average of the 98th percentile of the yearly distribution of 1-hour daily maximum concentrations)

Counties with three years of Nitrogen Dioxide Monitoring Data

AQS Site ID	County	NO2 2007-2009 Design Value (ppb)	Classification
470110102	Bradley*	32	Attaining
470370011	Davidson	49	Attaining
471070101	McMinn	43	Attaining
471630007	Sullivan	44	Attaining

Counties without three years of Nitrogen Dioxide Monitoring Data

	Remainder of state		Attaining/Unclassifiable
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*Incomplete data reported for 4th Qtr. 2009.