



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

DAVID W. SALYERS, P.E.
COMMISSIONER

BILL LEE
GOVERNOR

January 21, 2025

Denisse Diaz, Director
Air and Radiation Division
U.S. EPA, Region 4 Office
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Re: State Recommendations for Area Designations for 2024 PM_{2.5} NAAQS

Dear, Ms. Diaz:

On February 7, 2024, the EPA strengthened the primary annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) to 9.0 micrograms per cubic meter (µg/m³). Section 107(d)(1)(A) of the Clean Air Act requires each state to submit to EPA the recommended designation of each area of the state as nonattainment, attainment, or unclassifiable for the revised NAAQS no later than one year after NAAQS promulgation. In this letter, the Tennessee Department of Environment and Conservation (TDEC) presents preliminary recommended designations in accordance with EPA's memorandum dated February 7, 2024, "Initial Area Designations for the 2024 Revised Primary Annual Fine Particle National Ambient Air Quality Standard".

Table 1 includes initial area designations for each county in Tennessee. To support these recommendations, Table 2 displays PM_{2.5} design values from the most recent three-year period of certified data (2021-2023) from monitors within Tennessee and neighboring states with Combined Statistical Areas (CSAs) or Core Based Statistical Areas (CBSAs) with Tennessee counties. Based on this data, TDEC recommends "attainment/unclassifiable"¹ for all counties in Tennessee with attaining 3-year design values, below the revised NAAQS of 9.0 µg/m³.

Additionally, TDEC initially recommends attainment for counties with 3-year design values above the revised NAAQS of 9.0 micrograms per cubic meter assuming EPA will approve the Exceptional Event Demonstrations submitted by the Nashville/Davidson Metro Public Health Department, Knox County Health Department, the Shelby County Health Department, and the Georgia Environmental Protection Division.² These recommendations may be revised based on EPA's action on these exceptional event demonstrations.

¹ EPA's February 7, 2024, guidance memorandum indicates the EPA expects to use "unclassifiable/attainment" for areas that are not violating the NAAQS and are not contributing to a nearby violation of the NAAQS. The Tennessee Division of Air Pollution Control will, therefore, use "attainment/unclassifiable" for its recommendations for these categories of areas.

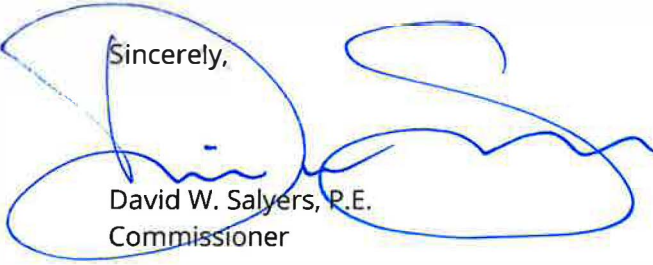
² Exceptional Event Demonstrations were submitted by each program considering the regulatory significance of the 2021-2023 and/or 2022-2024 monitored PM_{2.5} design values.

Denisse Diaz, Director
January 21, 2025
Page 2

TDEC may also revise these recommendations based on 2022-2024 design values following certification of 2024 PM_{2.5} monitoring data.

We appreciate the EPA's thoughtful consideration of our initial area recommendations. If you have any questions or need additional information on these recommendations, please contact Michelle Owenby, Director of the Division of Air Pollution Control at michelle.b.walker@tn.gov or 615-426-9250.

Sincerely,



David W. Salyers, P.E.
Commissioner

Table 1: Initial Area Designation Recommendations for each Tennessee county based on the 2021-2023 PM_{2.5} data.

CSA	County	Designation Recommendation
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Bradley	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Hamilton	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Marion	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	McMinn	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Meigs	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Polk	Attainment/Unclassifiable
Chattanooga-Cleveland-Dalton, TN-GA-AL³	Sequatchie	Attainment/Unclassifiable
Huntsville-Decatur-Albertville, AL-TN	Lincoln	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Carter	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Greene	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Hawkins	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Sullivan	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Unicoi	Attainment/Unclassifiable
Johnson City-Kingsport-Bristol, TN-VA	Washington	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Anderson	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Blount	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Campbell	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Cocke	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Grainger	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Hamblen	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Jefferson	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Knox	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Loudon	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Morgan	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Roane	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Sevier	Attainment/Unclassifiable
Knoxville-Morristown-Sevierville, TN³	Union	Attainment/Unclassifiable
Memphis-Clarksdale-Forrest City, TN-MS-AR	Fayette	Attainment/Unclassifiable
Memphis-Clarksdale-Forrest City, TN-MS-AR	Shelby	Attainment/Unclassifiable
Memphis-Clarksdale-Forrest City, TN-MS-AR	Tipton	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Bedford	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Cannon	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Cheatham	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Coffee	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Davidson	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Dickson	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN³	Franklin	Attainment/Unclassifiable

³ CSA with at least one violating monitor above the 2024 Annual PM_{2.5} NAAQS based on 2021-2023 data.

CSA	County	Designation Recommendation
Nashville-Davidson--Murfreesboro, TN ³	Hickman	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Lawrence	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Macon	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Marshall	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Maury	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Moore	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Robertson	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Rutherford	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Smith	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Sumner	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Trousdale	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Williamson	Attainment/Unclassifiable
Nashville-Davidson--Murfreesboro, TN ³	Wilson	Attainment/Unclassifiable
Union City-Martin, TN	Obion	Attainment/Unclassifiable
Union City-Martin, TN	Weakley	Attainment/Unclassifiable
	Benton	Attainment/Unclassifiable
	Bledsoe	Attainment/Unclassifiable
	Carroll	Attainment/Unclassifiable
	Chester	Attainment/Unclassifiable
	Claiborne	Attainment/Unclassifiable
	Clay	Attainment/Unclassifiable
	Crockett	Attainment/Unclassifiable
	Cumberland	Attainment/Unclassifiable
	Decatur	Attainment/Unclassifiable
	Dekalb	Attainment/Unclassifiable
	Dyer	Attainment/Unclassifiable
	Fentress	Attainment/Unclassifiable
	Gibson	Attainment/Unclassifiable
	Giles	Attainment/Unclassifiable
	Grundy	Attainment/Unclassifiable
	Hancock	Attainment/Unclassifiable
	Hardeman	Attainment/Unclassifiable
	Hardin	Attainment/Unclassifiable
	Haywood	Attainment/Unclassifiable
	Henderson	Attainment/Unclassifiable
	Henry	Attainment/Unclassifiable
	Houston	Attainment/Unclassifiable
	Humphreys	Attainment/Unclassifiable
	Jackson	Attainment/Unclassifiable
	Johnson	Attainment/Unclassifiable
	Lake	Attainment/Unclassifiable
	Lauderdale	Attainment/Unclassifiable

CSA	County	Designation Recommendation
	Lewis	Attainment/Unclassifiable
	Madison	Attainment/Unclassifiable
	McNairy	Attainment/Unclassifiable
	Monroe	Attainment/Unclassifiable
	Montgomery	Attainment/Unclassifiable
	Overton	Attainment/Unclassifiable
	Perry	Attainment/Unclassifiable
	Pickett	Attainment/Unclassifiable
	Putnam	Attainment/Unclassifiable
	Rhea	Attainment/Unclassifiable
	Scott	Attainment/Unclassifiable
	Stewart	Attainment/Unclassifiable
	Van Buren	Attainment/Unclassifiable
	Warren	Attainment/Unclassifiable
	Wayne	Attainment/Unclassifiable
	White	Attainment/Unclassifiable

Table 2. 2021-2023 Design Values for PM_{2.5} monitors in Tennessee counties or adjacent states with CSAs or CBSAs with Tennessee Counties before adjusting for Exceptional Event Demonstrations.

Area	Area Type	State-County	Site ID	2021-2023 Annual DV
Memphis-Clarksdale-Forrest City, TN-MS-AR	CSA	TN-Shelby	47-157-0075	8.3
		TN-Shelby	47-157-0024	8.9
		MS-DeSoto	28-033-0002	8.7
		TN-Shelby	47-157-0100	8.4
		AR-Crittenden	05-035-0005	8.2
Chattanooga-Cleveland-Dalton, TN-GA-AL	CSA	GA-Walker	13-295-0004	9.4 ⁴
		TN-Hamilton	47-065-4002	8.4
		TN-McMinn	47-107-1002	7.8
Knoxville-Morristown-Sevierville, TN	CSA	TN-Knox	47-093-1020	8.8
		TN-Knox	47-093-1017	9.1
		TN-Knox	47-093-1013	8.5
		TN-Blount	47-009-0011	7.4
		TN-Roane	47-145-0004	7.3
		TN-Loudon	47-105-0109	6.9
Nashville-Davidson-Murfreesboro, TN	CSA	TN-Davidson	47-037-0040	9.6
		TN-Sumner	47-165-0007	7.6
		TN-Lawrence	47-099-0003	6.8
		TN-Maury	47-119-2007	7.3
Clarksville, TN-KY	CBSA	KY-Christian	21-047-0006	8.6

⁴ On December 20, 2024, EPA approved a NAAQS exclusion for the PM_{2.5} monitor at Rossville-Williams Street. Therefore, the design value for GA-Walker county shown in Table 2 is a 2-year design value (2022-2023) based on FRM, filter-based data. FRM data from 2021 was not included since the FRM monitor did not start collecting data until May, 2021 and thus did not meet EPA's completeness criteria for that year.

Area	Area Type	State-County	Site ID	2021-2023 Annual DV
		TN-Montgomery	47-125-2001	7.2
Johnson City-Kingsport-Bristol, TN-VA	CSA	TN-Sullivan	47-163-1007	6.7
		VA-Bristol City	51-520-0006	7.3
Jackson	CBSA	TN-Madison	47-113-0010	8.1