2022 Certificate of Exemption (COE) Renewal
Supplemental Questions and Comments

County: Shelby

1. Regarding the findings of EPA’s most recent TSA audit mentioned in question G.7., has EPA provided a deadline for completion of any changes or corrective actions?

The response to “Question 1

RESPONSE: This is ongoing. The EPA contacts Shelby County on a monthly basis to determine any changes. The EPA is aware of the staffing shortage in the Air Monitoring Branch and has asked us to continue to ensure that the data is of good quality. The EPA said they would reach out to our Management staff to see if we could get the resources needed to properly run the monitoring program. We will continue to update SOPs and forms as time allows with the personnel available.

2. If so, when is the deadline and what steps are being taken to assure completion of any necessary changes by the deadline? If not, when do you anticipate having completed the necessary changes?

See above

3. Question B.7 asks if your local regulations are available online and if they are current. There was no response addressing how current your regulations are online. In fact, it is noted that, for example, when looking at Shelby County Air Code Section 3-9, the latest date for incorporation of Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations is June 30, 2003. Weren’t these updated (as well as many others) through ordinance 507 in 2018, effective January 13, 2020?

Yes we have gotten successful adoption by reference of the air regulations as of 2018 in Shelby County, Germantown, Collierville, Bartlett, Millington and Arlington. We expect
the City of Memphis and town of Lakeland to adopt the updated regulations within the next 2 months. We were waiting to correct the web site until all were done.

4. Does your local program notify surrounding states (including Tennessee) of new permits or permit modification for Title V sources and allow for a 30 day comment period on those permits as Tennessee does per 1200-03-09-.02(11)?

Yes we do.