

## Public Hearing Summary

**Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, Tennessee 37243**

**The Public Hearing was held in room 15A of the William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor, Nashville, Tennessee and via WebEx video-teleconference in the interest of protecting public health, safety, and welfare considering the COVID-19 pandemic**

**9:30 A.M.  
June 21, 2021**

Hearing Officer:	Paul LaRock
Division of Air Pollution Control Representatives:	Bradley King (APC) Jason Stephens (APC)
Other Divisions: Resources Management Bureau	None
Public	None

## Comment Summary

This public hearing has been called to consider the proposed Draft Tennessee Ambient Air Monitoring Plan for 2021 and the Draft Local Programs Ambient Air Monitoring Plan 2021 pursuant to Tennessee Code Annotated, Section 68-201-105.

No Public comments were received at the public hearing.

Commenter	Comments taken at the public hearing	Response
None	None	None

Commenter	Comments received by email or letter	Response
Eastman Chemical Company, electronic submittal received 06/21/21  <b>State of Tennessee</b>	Eastman Chemical Company (Eastman) offers the following comments on the 2021 Tennessee Annual Monitoring Network Plan dated July 1, 2021.  1. <u>Skyland Drive Sulfur Dioxide Monitor</u> As described on page 13 of the plan, EPA has required three additional sulfur dioxide (SO <sub>2</sub> ) monitors aside from the minimum of one PWEI monitor. This includes the Ross N Robinson, Happy Hill, Andrew Johnson Elementary School, and Skyland Drive locations. As stated on page 34, the Skyland Drive site was established to characterize maximum expected concentrations in the nonattainment area. EPA conditioned its proposed	<b>1. Tennessee's obligation under the Clean Air Act and goal for the Kingsport area is to demonstrate attainment with the SO<sub>2</sub> NAAQS and have it reclassified as quickly as allowable. Four SO<sub>2</sub> monitoring sites, including the Skyland Drive SO<sub>2</sub> SLAMS monitor, were established as required by the EPA to monitor possible areas of expected maximum concentration and to establish</b>

approval of the Tennessee SO2 State Implementation Plan (SIP) (see 83 FR 30621; June 29, 2018) on Tennessee’s agreement to deploy additional monitors “and locate the monitors as close as possible to the areas of expected maximum concentration.” EPA has not issued a final approval, and, in fact, TDEC is currently working with Eastman and EPA on a revised SIP.

As Eastman, TDEC, and EPA worked together to develop a SIP, an earlier version of the modeling utilizing the rural dispersion coefficients did show the ridge top along Skyland Drive to be an area of predicted maximum concentrations. At this point, Eastman assisted TDEC with installation of the monitoring station in the existing shelter at Skyland Drive (Eastman had previously operated ambient air monitors at this location in the 1980s). Subsequently, Eastman, TDEC, and EPA agreed the urban dispersion coefficients were more appropriate. This model does not show the Skyland Drive location to be an area of high concentrations of SO2 (for example, see Figure 7-3 of TDEC’s May 2017 Attainment Demonstration). Further, the three years of monitoring data also does not show this to be a location of high concentrations, particularly since the conversion of Eastman’s B-253 Powerhouse from coal to natural gas. The other three monitors have consistently measured significantly higher concentrations. See Figure 1 (TDEC’s chart of SO2 design values) Since a SIP revision requiring this monitor has not been approved, EPA and TDEC have an opportunity to save TDEC and EPA resources (and thus the Title V Fee payers and the taxpayers of Tennessee) and shut-down this monitor.

2. Kingsport Site Ozone Monitor

As stated on page 31 of the plan, the Kingsport MSA is required to have only one ambient air ozone site. However, two sites (one at Indian Springs Elementary School in Blountville and one on Bloomingdale Road in Kingsport) are being operated in the same county (Sullivan). These two sites have historically measured nearly identical ozone design values. Shown in the table below are the 4th highest values along with the design values for 2018-2020:

	2018 4 <sup>th</sup> High	2019 4 <sup>th</sup> High	2020 4 <sup>th</sup> High	Design Value
Blountville	65 ppb	64 ppb	55 ppb	61 ppb
Kingsport	65 ppb	63 ppb	56 ppb	61 ppb

a robust SO2 monitoring network. Initial modeling did show Skyland Drive as a maximum receptor, but actual monitoring data has shown higher impacts closer to the Eastman facility at the Andrew Johnson Elementary and Ross N Robinson monitoring sites.

An EPA approved shutdown of the Skyland Drive site will not be possible at this time due to the current nonattainment designation of the Kingsport area. EPA considers the Skyland monitor necessary to “fully characterize” the monitoring network required during the SIP attainment discussion. The Skyland monitor and its associated data will be needed to demonstrate attainment with the NAAQS and aid in the completion of an attainment SIP for the area.

Also, the Skyland SLAMS monitoring site was established in September 2016 and currently has insufficient data to demonstrate the monitor has attained the NAAQS over a five-year period in accordance with Section 4 of the EPA Ambient Monitoring Network Guidance.

2. The Kingsport and Blountville ozone monitoring sites are both operated in Sullivan County with historically similar design values. Although the MSA is only required to have 1 ozone monitoring site, the Kingsport and Blountville monitors are in high-risk population areas. People at greater risk from

The plan states that both sites are downwind of Kingsport. For a regional pollutant such as ozone, Eastman questions that TDEC is cost justified to operate both of these monitors in the same county. Eastman suggests the Kingsport monitor be considered for shut down, again saving money for Title V Fee payers and the taxpayers of Tennessee.

Sincerely,



Stephen R. Gossett, PE Environmental Fellow Global Health, Safety, Environment, and Security.

Preliminary Kingsport SO<sub>2</sub> Data for 2019 - 2021\*

County	Site Name	MONITOR ID	2019 4th Max.	Preliminary 2020 4th Max.	Preliminary 2021 4th Max.	Preliminary 2019 2021 DV= 0.075 PPM *	2021 4th Max Needed for 1 Hr DV Violation (=0.075 PPM)
Sullivan Co	Ross N Robinson	471636001	0.059	0.045	0.039	0.047	0.124
Sullivan Co	Skyland Drive	471636002	0.039	0.026	0.020	0.025	0.172
Sullivan Co	Happy Hill	471636004	0.052	0.046	0.038	0.045	0.130
Sullivan Co	Andrew Johnson	471636003	0.104	0.073	0.062	0.079	Threshold Met

\* The current year data has not undergone QA/QC validation procedures. It is considered preliminary and subject to change.  
 \*\* Truncation to the 3rd digit applied 0.0756 = 0.075 ppm.

Data updated through: 06/07/2021

0.000	0.075	Less than 076
0.076	0.185	Between 076 and 185
0.186	1.850	Greater than 185

ground-level ozone are people with lung diseases, such as asthma, older adults and children, and adults who are active outdoors. Both monitors operate to serve the distinct populations in the area of Indian Springs Elementary and Ketron Elementary Schools. The monitors are also in a shared MSA with the State of Virginia. Tennessee has agreed with the State of Virginia to maintain both monitors to adequately characterize air quality in the Kingsport-Bristol-Bristol, TN-VA MSA.

Sara Waterson EPA, Region 4, email comments received 06/15/21

State of Tennessee

I see the MOAs that Michelle signed with Virginia and Kentucky, but do you have letters signed from those agencies saying that they will continue to operate monitors that meet monitoring requirements outside of TN?

MOA responses were received from Virginia and Kentucky and included in Appendix B.

Sara Waterson, EPA, Region 4, email comments received 06/28/21

Shelby County Local Program

EPA requests Shelby County include a copy of ADEQ's signed MOU for area-wide NO<sub>2</sub> monitoring in the Memphis TN-MS-AK MSA in future Network Plans.

The Shelby County local program contacted ADEQ in response to this comment and is waiting on a signed MOU for area-wide NO<sub>2</sub> monitoring in the Memphis TN-MS-AK MSA. From communication with ADEQ, there have been no changes to the network and they still operate the NO<sub>2</sub> monitor.

<p>Sara Waterson, EPA, Region 4, email comments received 06/29/21</p> <p><b>Shelby County Local Program</b></p>	<p>EPA requests Shelby County draft and finalize an updated MOU document to reflect changes in the network agreed upon by the 3 monitoring agencies and needed updates identified by Michael Jordan (Mississippi). The updated document will need the current date, updated SCHD acting air director, and Shelby Co letterhead. Prior to finalizing, Shelby Co should also reach out to Arkansas to see if they have a permanent air director in place and update the document accordingly.</p>	<p>The Shelby County local program drafted and finalized an updated cover letter and MOA document in accordance with EPA comments. The updated documents are included in the final plan as Appendices A and B.</p>
<p>Sara Waterson, EPA, Region 4, email comments received 06/15/21</p> <p><b>Knox County Local Program</b></p>	<p>EPA reviewed the Knox County Annual Network Plan and offers the following public comments.</p> <p>Knox County discussed a new monitoring site at Parton Place on Tennessee Ave in “Section 4.0 Proposed Changes.”</p> <p>Additional information related to the site selection of Parton Place will need to be provided in the final Annual Network Plan submittal for EPA to be able to approve the site.</p> <ul style="list-style-type: none"> <li>• Knox County provided modeling information in “Section 6.0 Model Report-CMC Steel USA, LLC Fence Line Pb Monitor Modeling;” however, an analysis of the rankings and site selection process based on modeling results was not included in the report. This report should explain how the Parton Place location was selected, and why a site with a higher rank could not be established along Tennessee Ave.</li> <li>• The Proposed Changes section should include the following information: <ul style="list-style-type: none"> <li>○ Discussion on what the model outputs show and mean.</li> <li>○ A narrative description and relevant documentation of your agency’s site selection process. This should include any documentation demonstrating how your agency followed the appropriate EPA guidance for selecting a site and your process for looking into several properties by rank. Please discuss why higher ranked sites were not chosen (e.g. access issues). Document the steps Knox County completed to find a suitable monitoring location.</li> <li>○ Provide a good public record on the thought process for site selection.</li> </ul> </li> </ul>	<p>The Knox County local program has addressed the public comments in their final plan detailed in Appendix C “Response to Comments”.</p>

In addition to the above information, please provide:

- A proposed timeframe for installation of the monitor
- A proposed timeframe for data collection
- A discussion on how you will determine which monitor is the maximum concentration monitor, including the minimum timeframe for data collection at both sites
- The expected process of maintaining the maximum concentration monitor as a SLAMS monitor and the request to shut down the lower reading to be included in future annual network plans
- Expected probe height
- It would be useful to include 3.7 Proposed New Site – “Parton Place” within the Proposed Changes section rather than splitting the information

As part of the waiver request, please provide a thorough discussion on:

- Explanation of Pb source-oriented monitoring and the importance of collecting data at the highest possible receptor with a clear line of sight of the facility.
  - The expected amount of unrestricted airflow
  - Refer back to the process for securing a suitable property, and provide discussion on if another, more suitable site was not available
  - The narrative text should clearly state if there will be a clear line of sight between the monitor and the facility
    - 40 CFR Part 58 Appendix E 5 (c): “For microscale sites of any air pollutant, no trees or shrubs should be located between the probe and the source under investigation, such as a roadway or a stationary source” and how this applies to your waiver request

For the discontinuation of the Burnside monitor, please provide an updated version (e.g. 2020 data) of Section “4.2.2 Lead” included in the 2020 Annual

	<p>Network Plan/Assessment. The discussion provided in 2020 Annual Network Plan/Assessment was thorough in explaining the difference between the Ameristeel and Burnside sites, including why Knox Co is requesting to shut down Burnside over the Ameristeel site.</p>	
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