



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

**ROBERT J. MARTINEAU, JR.**  
COMMISSIONER

**BILL HASLAM**  
GOVERNOR

September 16, 2015

Heather McTeer Toney, Regional Administrator  
USEPA, Region IV  
61 Forsyth Street, SW  
Mail Code: 9T25  
Atlanta, GA 30303-8960

RE: Tennessee's Round 2 - 2011 Sulfur Dioxide Designations Recommendations

Dear Ms. McTeer Toney:

Tennessee currently has one area in the state identified through monitoring as not meeting the 1 Hr SO<sub>2</sub> NAAQS (75 PPB). This area is the Kingsport SO<sub>2</sub> nonattainment area, a partial county area located in Sullivan County, TN designated nonattainment on October 4, 2013. This designation was made based on the 2009 to 2011 monitored violations of the SO<sub>2</sub> standards under the "Round 1" designations.

Tennessee is now required to make "Round 2" designation recommendations based on any new monitored violations of the 1 Hr SO<sub>2</sub> standard and on the areas in the US in which the 68 fossil fuel power plants are located subject to the "Consent Decree" in the court order of March 2, 2015. These recommendations are required to be made no later than Sept. 18, 2015.

At this time the only electric power plant source located in Tennessee that is subject to the "Consent Decree" is the TVA Gallatin Fossil Plant with SO<sub>2</sub> emissions in excess of 21,000 TPY for 2012. At this time Tennessee believes that TVA Gallatin will submit a modeling demonstration based on future allowable emissions that show the facility is meeting the 1 Hr SO<sub>2</sub> NAAQS and will not elect to conduct air monitoring for SO<sub>2</sub> in the area near this facility. Therefore Tennessee will recommend a "Round 2" designation as follows:

<b>Area or Source</b>	<b>Basis for Recommendation</b>	<b>Recommendation</b>
<b>Vicinity of the TVA Gallatin Fossil Plant located in Sumner County, TN within a 50 Km radius of the facility in Tennessee and centered on the following coordinates: 36.3165 Lat., -86.4033 Lon.</b>	<b>Attaining modeling demonstration approved and submitted to EPA on or before January 22, 2016.</b>	<b>Attainment (See attached recommendation graphic)</b>



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TVA is also proposing to further reduce the SO<sub>2</sub> emissions from their combined facility sources in such a manner as to insure that the future emissions from this facility do not contribute to a violation of the 1 Hr SO<sub>2</sub> NAAQS.

The attainment modeling demonstration will be based on future controls at the Gallatin Fossil Plant. TVA is currently in the process of installing flue gas desulfurization (FGD) systems on all four electric generating units at the plant. These FGD systems are required to be installed as the result of an enforceable Consent Decree with the Tennessee Valley Authority (State of Alabama et. al. v. TVA, Civil Action No. 3:11-cv-00170, filed April 14, 2011, approved June 30, 2011). These systems will be operational on or before April 16, 2016, in order for the facility to comply with 40 CFR 63 Subpart UUUUU (National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units). The requirement to install and operate the FGD systems, along with appropriate enforceable emission limits, will be included in the Gallatin Fossil Plant Title V permit on or before April 8, 2016. Attached are an aerial photograph and an artist's rendering showing the location of the FGD system. Currently, two FGD systems are on-line and operating, with the two other systems projected for start-up in early 2016.

Tennessee intends to supplement this recommendation with additional information on or before January 22, 2016. This additional information may include: a test protocol for the dispersion modeling, the modeling results, an updated inventory of other sources of sulfur dioxide within the recommended attainment area boundary based on the 2014 National Emission Inventory, and analyses of the five factors (air quality/dispersion modeling data, emissions-related data, meteorology, geography/topography, and jurisdictional boundaries) as identified in EPA's March 20, 2015, memorandum entitled "Updated Guidance for Area Designations for the 2010 Primary National Ambient Air Quality Standard". Based on this additional data, Tennessee may also revise its recommendation for the boundary of the recommended attainment area.

Tennessee will also provide additional recommendations to EPA based on the requirements in the recently promulgated DRR under the "Round 3" and "Round 4" designation process timelines as required at the appropriate times.

I believe these recommendations will enable Tennessee to attain the sulfur dioxide standard within the deadlines established by the Clean Air Act and its implementation regulations.

Your favorable review of these revised recommendations will be appreciated.

Sincerely,

  
Robert J. Martineau, Jr.  
Commissioner

Enclosures

Copy w/enclosure: Scott Davis, EPA Region IV  
Carol Kemker, EPA Region IV  
Lynorae Benjamin, EPA Region IV





# Gallatin (showing FGDs & SCRs Installed)





TVA

