

NOTICE
OF PUBLIC HEARING
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

STATE IMPLEMENTATION PLANS
Sullivan County Redesignation Request and Maintenance Plan for the Bristol Lead (Pb) Partial
Nonattainment Area

There will be a public hearing before the Technical Secretary of the Tennessee Air Pollution Control Board to consider the thirty (30) day public notice addressing Section 172(c), as amended of the Clean Air Act (CAA) requirements for states developing a federally enforceable State Implementation Plan (SIP) for Lead (Pb) Nonattainment Area (NAA). The SIP documents how an area will attain the National Ambient Air Quality Standards (NAAQS) and generally contains four elements: emission inventory, clean data determination or modeled attainment demonstration, Reasonably Available Control Technology/Reasonably Available Control Measures (RACT/RACM) analysis, and adoption of controls.

This proceeding satisfies the redesignation to attainment based upon clean data determination (i.e., air quality monitoring) and maintenance plan submittal requirement.

The Tennessee NAA for the Lead (Pb) NAAQS consists of an area within Sullivan County with a radius of one and a quarter (1.25) kilometers (0.78 mile) from the Exide Technologies (or Exide) Lead Company. From the period January 2007 to January 2008, air quality monitoring data at the Exide's Lead site indicated that the rolling 3-month average Pb concentrations exceeded the 0.15 $\mu\text{g}/\text{m}^3$ NAAQS. The Environmental Protection Agency (EPA) designated the area as nonattainment for the Pb NAAQS, effective December 31, 2010. More recently, air quality data for 2011 through 2013 indicates declining lead concentrations in the Sullivan County area and the design value (DV) at the controlling monitor shows attainment of the NAAQS.

This proceeding documentation constitutes the Tennessee redesignation request to attainment based upon the 2011-2013 DV and the 2010 base year (BY) and 2022 future year (FY) maintenance plan for the Bristol partial Pb NAA.

The hearing will be conducted in the manner prescribed by the Uniform Administrative Procedures Act, Tennessee Code Annotated, Section 4-5-201 et. seq. and will take place in the Sullivan County Courthouse located at 3411 Highway 126, Blountville, TN 37617, at 4:00 p.m. on Thursday, May 21, 2015. Anyone desiring to make oral comments at this public hearing is requested to prepare a written copy of their comments to be submitted to the hearing officer at the public hearing.

Written comments not submitted at the public hearing will be included in the hearing record only if received by the close of business on Thursday, May 21, 2015, at the following address: Technical Secretary, Tennessee Air Pollution Control Board, 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, TN 37243.

Individuals with disabilities who wish to participate in these proceedings or to review these filings should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such initial contact may be in person, by writing, telephone, or other means, and should be made no less than ten (10) days prior to Thursday, May 21, 2015, or the date such party intends to review such filings, to allow time to provide such aid or service. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, 2nd Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville TN 37243, 1-866-253-5827 (toll free) or (615) 532-0200. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If you have any questions about the SIP Lead documentation(s), you may contact Mr. Haidar Al-Rawi, P.E. at (615) 532-0578. Copies of document(s) concerning this matter are available for review at the office of the Technical Secretary and at certain public depositories. For information about reviewing these documents, please contact Mr. Haidar Al-Rawi, P.E., 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, TN 37243, telephone (615) 532-0578.

Materials concerning the proposed action will be available at <http://tn.gov/environment/ppo/#air> under the heading of

“Sullivan County Lead (Pb) Redesignation to Attainment.”

and also for public inspection during normal working hours starting on Thursday, April 16, 2015, at the following locations:

Air Pollution Control Division
15th Floor, William R. Snodgrass TN Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

Air Pollution Control Division
Johnson City EFO
2305 Silverdale Road
Johnson City, TN 37601-2162

Kingsport Public Library
400 Broad Street
Kingsport, TN 37660

U.S. EPA, Region IV
APTMD - 12th Floor
Atlanta Federal Center
61 Forsyth Street S.W.
Atlanta, Georgia 30303
c/o Mr. Scott R. Davis, Chief (SIP)

All persons interested in the air quality of the State of Tennessee are urged to attend and will be afforded the opportunity to present testimony to the hearing officer regarding the proposed re-designation and maintenance plan. Any person desiring to present lengthy comments should be prepared at the hearing to offer a written statement to be incorporated into the record. Written statements not presented at the hearing will only be considered part of the record if received by 4:30 p.m. CDT on Thursday, May 21, 2015, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243.

Sullivan County Pb REDESIGNATION and MP Public Hearing Notice_04102015.doc

Pre-Hearing DRAFT #2 (Revised)

**REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR
THE PARTIAL SULLIVAN COUNTY, TN LEAD (Pb)
NONATTAINMENT AREA**

for the

**Bristol, Tennessee
Lead Nonattainment Area**

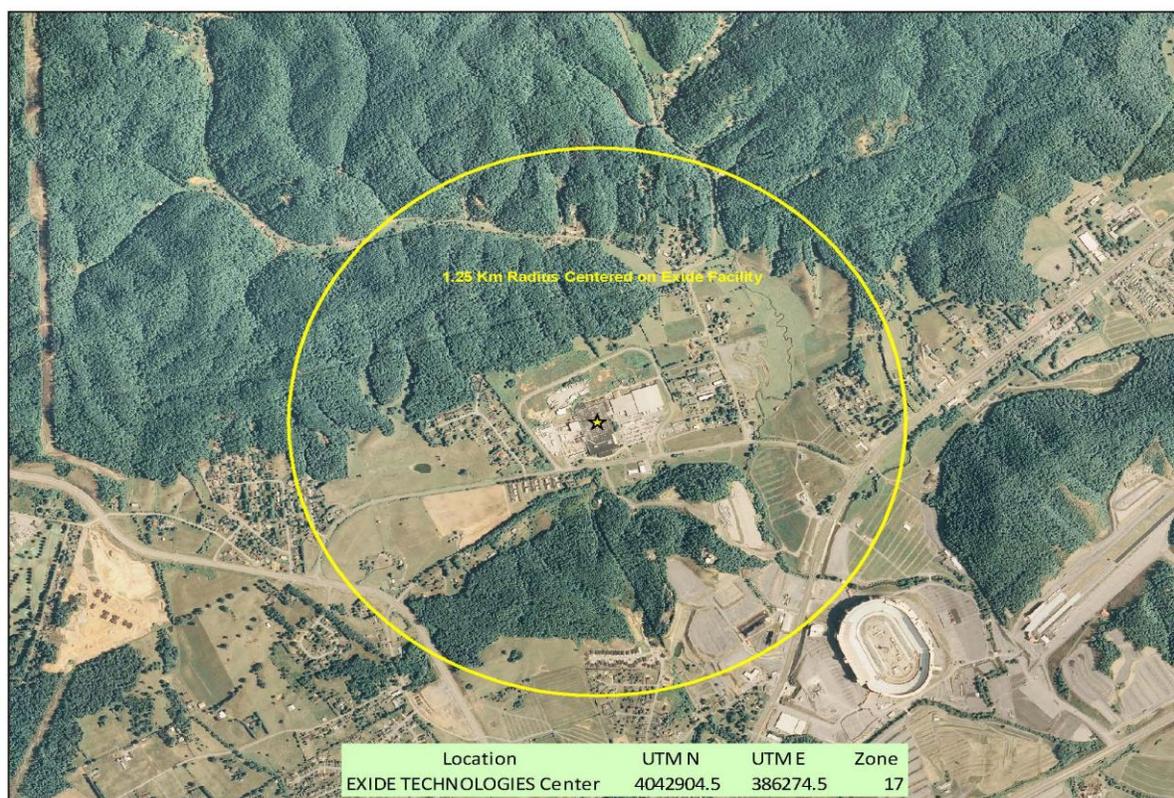


**Prepared by
the
Tennessee Department of Environment and Conservation
Air Division**

April 10, 2015

EXECUTIVE SUMMARY

The Nonattainment Area (NAA) for the Lead (Pb) National Ambient Air Quality Standard (NAAQS) consists of an area within Sullivan County as shown below with a radius of one and a quarter (1.25) kilometers (0.78 mile) from the Exide Technologies (or Exide) Lead Company. From the period January 2007 to January 2008, air quality monitoring data at the Exide's Lead site indicated that the rolling 3-month average Pb concentrations exceeded the 0.15 $\mu\text{g}/\text{m}^3$ NAAQS. The Environmental Protection Agency (EPA) designated the area as nonattainment for the Pb NAAQS (2007-2009 design value), effective December 31, 2010.



Bristol is located in northeastern Tennessee, in Sullivan County, approximately 113 miles northeast of Knoxville, Tennessee.

More recently, air quality monitoring data for 2011 through 2013 indicates declining lead concentrations in the Sullivan County area, and the design value at the controlling monitor shows attainment of the NAAQS.

Tennessee is petitioning EPA for redesignation of the Bristol Lead (Pb) nonattainment area to attainment for the 2008 3-month rolling average NAAQS, based on an attaining the most recent three-year design value for the period 2011-2013. This petition is submitted pursuant to §107(d)(3) of the Clean Air Act, which specifies the requirements for redesignation of nonattainment areas.

This petition will show that the Bristol, Sullivan County partial nonattainment area has attained the National Ambient Air Quality Standard and that the observed reduction in lead levels is due to permanent and enforceable emission reductions at the federal, State, and local levels. In addition, the monitoring data indicates declining lead emissions between 2011 and 2013. Also, the included emissions inventory to be the same at the 2012 attainment year levels or lower by 2022. However, this petition includes contingency measures that may be put into place, if necessary, to correct NAAQS violations that may occur after redesignation of the area to attainment.

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REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE PARTIAL SULLIVAN COUNTY, TN LEAD (Pb) NONATTAINMENT AREA

CHAPTER ONE

1 Introduction

The Clean Air Act (CAA), as amended, requires each State with areas failing to meet the 3-month rolling average (TMRA) lead National Ambient Air Quality Standard (NAAQS) to develop State Implementation Plans (SIPs) to expeditiously attain and maintain the standards. The United States Environmental Protection Agency (U.S. EPA) revised the NAAQS for lead on November 12, 2008 (73 FR 66964). It replaced the existing quarterly lead standard of 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) with a lower TMRA standard set at 0.15 $\mu\text{g}/\text{m}^3$. The new lead standard is measured as a running three-month average (not to be exceeded) of the monthly mean concentrations, which is evaluated over a three-year period.

On November 16, 2010, U.S. EPA promulgated the initial lead nonattainment areas designations for the lead standard, which became effective on December 31, 2010. Section 191 of the CAA Amendments requires states with lead nonattainment areas to submit a plan within eighteen months of the effective date of the designations (June 30, 2012) detailing how the lead standard will be attained by December 31, 2015. However, for this area, Tennessee attained the standard (for 2009-2011 design value) prior to the date this attainment demonstration was required (EPA-acknowledged on September 28, 2012; 77 FR 52232); therefore, the requirement to submit an attainment demonstration is waived. Tennessee submitted a clean data request to U.S. EPA on April 4, 2012 so that U.S. EPA could formally acknowledge attainment of the area. Regardless of any clean data determination by U.S. EPA, states must still submit redesignation requests and maintenance plans in order for any area to officially be redesignated back to attainment. This submittal satisfies that requirement.

This petition is submitted to the United States Environmental Protection Agency (EPA) to request redesignation of the Bristol, Tennessee lead partial nonattainment area from nonattainment to attainment for the 3-month rolling average lead National Ambient Air Quality Standard (NAAQS), pursuant to §107(d)(3) of the Clean Air Act (CAA). The Act specifies the following requirements for redesignation of nonattainment areas:

1. The Administrator determines that the area has attained the national ambient air quality standard;
2. The Administrator has fully approved the applicable implementation plan for the area under section 110(k);
3. The Administrator determines that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions;
4. The Administrator has fully approved a maintenance plan for the area as meeting the requirements of section 175A; and
5. The State containing such area has met all requirements applicable to the area under section 110 and part D.

Tennessee is petitioning EPA for redesignation of the Bristol lead partial nonattainment area to attainment based on an attaining the most recent three-year design value for the period 2011-2013. This document demonstrates that the Bristol lead partial nonattainment area meets the above requirements, and can petition the EPA for redesignation in lieu of an attainment demonstration. Submission of an attainment demonstration in place of this redesignation request would not necessarily result in additional controls, since ambient air quality data indicates that the area is attaining the NAAQS. This petition does not preclude Tennessee from implementing additional controls in the Bristol area in order to avoid future designations resulting from future revisions of the lead NAAQS.

2 GEOGRAPHICAL DESCRIPTION AND BACKGROUND

Bristol Geologic Region

Ridge and Valley

The city of Bristol is located within the Ridge and Valley region of Tennessee, which is located between the Cumberland Plateau to the west and the Blue Ridge Mountains to the east (Figure 1-1). The width of the region ranges from 30 to 70 miles, with an average width of 45 miles. The topography of the Ridge and Valley consists of long linear ridges and parallel lowland valleys that trend in a northeast to southwest direction. The ridges usually have high elevations of 1,100 to 1,500 feet while the adjacent valley floors vary from 700 to 1,000 feet. The ridges and valleys generally have high elevations in the northern part of the region, with slightly lower elevations to the south.

Blue Ridge and Great Smoky Mountains

The Blue Ridge and Bristol MSA² extend along the Tennessee-North Carolina-Virginia border and is the easternmost physiographic province in Tennessee. This region consists of high peaks and heavily forested terrain, broken by deeply carved stream valleys. The Great Smoky Mountains includes the highest point in the State at Clingman's Dome (6,643 ft.) in Sevier County. In addition to Clingman's Dome, there are 13 other mountain peaks in the Blue Ridge with heights of over 6,000 feet and 33 peaks of more than 5,000 feet. A large percentage of those peaks are situated directly on the Tennessee/North Carolina/Virginia border, with the greatest concentration found in Sevier County. Narrow lowland valleys and isolated coves, ranging from 1,000 to 2,000 feet in elevation, are also a part of the region's topography.

Figure 1-1: Bristol MSA Geologic Regions



Bays Mountain

Bays Mountain is a ridge of the Ridge-and-Valley Appalachians, located in eastern Tennessee. It runs southwest to northeast, from just south of Knoxville to Kingsport.

Its southern segment is relatively low in elevation (up to about 1,300 feet (396.2 m)). In some places it essentially merges with the surrounding plains, especially where it is bisected by the French Broad River and the Nolichucky River.

The northern segment of Bays Mountain reaches higher elevations, averaging above 2,000 feet (609.6 m) with peaks reaching up to 3,000 feet (914.4 m). It is not a single ridge, but rather a series of closely related ridges, some of which have names of their own. The highest peak is Chimney top Mountain (3,117 feet (950.1 m)), a spur ridge south of the main Bays Mountain ridge.



Figure 1-2 Northernmost Terminus of Bays Mountain at Kingsport, Tennessee

Bays Mountain runs just south of the Holston River, which flows northeast to southwest. At Kingsport the Holston River curves east and south, splitting into three tributary forks that flow from Virginia to the northeast. Bays Mountain ends abruptly at this curve of the Holston River. Kingsport is on the north side of the river, directly across from the end of Bays Mountain, where two ridges meet in a "V" with an impounded lake (the old reservoir) between the ridges.

Climate Synopsis for East Tennessee³

Tennessee's topography is highly varied and has a significant impact on the state's climate. The landscape varies generally from west to east, starting with the gently

rolling lowlands in the west, and dominated by the Blue Ridge Mountains in the east. Average annual temperatures across the State range from about 55° F to 60° F, with mean winter temperatures of about 35° F and summer temperatures 75° to 80° F. These general patterns are affected by topography, and the mountain areas tend to have milder summers and colder, more blustery winters. In the Ridge and Valley region of east Tennessee, annual precipitation ranges from 40 inches in the north to over 50 inches in the south. The Blue Ridge region is the wettest part of the State, with annual totals of up to 80 inches in the higher elevations. In general, the greatest precipitation occurs in winter and early spring⁴, with a secondary maximum of precipitation from midsummer thunderstorms.

1 All elevations are relative to sea level.

2 The Bristol MSA is part of the Blue Ridge Mountains, which run from northern Georgia to Pennsylvania.

3 Adapted from: *Climatology of the United States*, No. 60, National Climatic Center

Bristol MSA Meteorology

The climate of the Bristol MSA is strongly influenced by the surrounding mountains. July is usually the warmest month of the year, and the coldest weather typically occurs during January. Sudden temperature changes are infrequent, mainly due to the retarding effect of the mountains. The average high temperature for the year is 69.3 degrees, but during the ozone season, the average high temperature rises to 77.8 degrees. Daytime winds usually have a southwesterly component, while nighttime winds usually move from the northeast. The winds are relatively light, averaging 6.9 mph for the year, and during ozone season, the average wind speed decreases to 6.6 mph.

Rainfall is favorably distributed during the year. Precipitation is greatest in the winter, with a secondary peak during the late spring and summer months. The period of lowest rainfall occurs during the fall. The surrounding mountains serve as a fixed incline plane, which lifts the warm, moist air flowing northward from the Gulf of Mexico and increases the frequency of afternoon thunderstorms. These thunderstorms reduce the number of extremely warm days in the valley and provide relief from extremely high temperatures.

4 The higher rainfall totals in winter and early spring are primarily due to the more frequent passage of large-scale (frontal) storms.

3 STATUS OF AIR QUALITY

In accordance with CAA §110 (k), Tennessee’s request to amend the State Implementation Plan is based on the most recent three years of data as shown below, which indicate no additional violations of the lead NAAQS for the 2011 – 2013, 3-year design value. Data collected from the monitoring networks were extracted from the EPA AIRS-AQS database and used to perform an evaluation into the possible future lead trend for this area. AQS 2009-2013 lead data maximum values for the controlling monitor (47-163-3001) are shown in Appendix A.

Table 1 - Monitoring data for the partial Sullivan County, TN Area for 2008 – 2013

		3-Yr Design Value - Lead Max Quarterly Avg. (ug/m3)			
Site Operator	AQS ID	2008 to 2010	2009 to 2011	2010 to 2012	2011 to 2013
Exide Co.	471633001	0.17	0.09	0.08	0.07
Exide Co.	471633002	0.06	0.06	0.04	0.04
Exide Co.	471633003	0.08	0.06	0.05	0.05
TDEC APC	471633004	0.05	0.08	0.08	0.08

CHAPTER TWO

Requirements for Redesignation

U.S. EPA has published detailed guidance in a document entitled *Procedures for Processing Requests to Redesignate Areas to Attainment* (redesignation guidance), issued September 4, 1992, to Regional Air Directors. The redesignation request and maintenance plan are based on the redesignation guidance, supplemented with additional guidance received from staff of U.S. EPA Region 4.

Below is a summary of each redesignation criterion as it applies to the partial Sullivan County nonattainment area.

i.) Attainment of the standard (CAA Section 107(d)(3)(E)(i))

There are two components involved in making this demonstration. The first component relies on ambient air quality data. The data that are used to demonstrate attainment should be the product of ambient monitoring that is representative of the area of highest concentration (AQS ID 471633001). The data should be collected and quality-assured in accordance with 40 CFR 58 and recorded in the Air Quality System (AQS) in order for it to be available to the public for review.

The second component relies upon supplemental U.S. EPA- approved air quality modeling. While no modeling is required for redesignating nonattainment areas, the redesignation guidance states it is “generally necessary” for lead redesignations in order to evaluate comprehensively sources’ impacts and to determine the areas of expected high concentrations based upon current conditions. Because the only source of lead emissions in the nonattainment area is Exide Technologies (Exide), and Exide modeling has shown a radius of 1.25 km that defines the extent of this partial nonattainment area for Sullivan County, additional modeling is not necessary since we are relying on clean monitoring data.

ii.) Permanent and enforceable improvement in air quality (CAA Section 107(d)(3)(E)(iii))

The state must be able to reasonably attribute the improvement in air quality to emission reductions which are permanent and enforceable. The state should estimate the percent reduction achieved from federal measures as well as control measures that have been adopted and implemented by the state.

The Exide facility, a producer of batteries for the automotive industry, became subject to the MACT requirement of 40 CFR 63, Subpart P (or 6P), National Emission Standards for Hazardous Air Pollutants (NESHAP) for Lead Acid Battery Manufacturing Area Source, as an existing source on July 16, 2007. Compliance with the applicable provisions was demonstrated by July 16, 2008. The MACT also requires compliance with the applicable NSPS provisions as stipulated in 40 CFR 60, Subpart KK. The facility has shown compliance with the federal and State standards through the application of the numerous fabric filters (at 99% control efficiency) and wet scrubbing control systems (at 90% control efficiency) for lead (Pb) and PM

emissions. The source was not allowed to operate without the controls in place.

The existing emission controls have achieved emission reductions that are permanent and enforceable and shown improvement in air quality as demonstrated by the recent monitoring design values. They are also deemed by U.S. EPA as a RACM (and RACT) for this source category as stated in the EPA guidance document "Implementation of the 2008 Lead National Ambient Air Quality Standards Guide to Developing Reasonably Available Control Measures (RACT) for Controlling Lead Emissions. EPA-457/R-12-001, March 2012." In October 2014, the Exide facility permanently shut down all lead operations and surrendered its permits.

The current Exide operations involve the sole purpose of circulating air ventilation for the facility preservation of equipment and to prevent stagnant air and or potential mold issues. This is accomplished by utilizing baghouse #3 and/or baghouse #4.

Baghouse #3 was re-bagged back in April of 2013 and exhausted COS Lines 11A, 11B, and TBS9 (source 04: three phase assembly, ASY-003) under the current (now surrendered) CMOP 455099 when the facility was in operation.

Baghouse #4 exhausted COS Lines 6 through 10 (source 15: three phase assembly, ASY-002) when the facility was in operation. At this time baghouses #3 and #4 are not tied into any source equipment. All equipment associated with baghouses #3 and #4 are disconnected and out of service.

There are currently only four (4) employees that are doing the clean-up operations, where they enter the facility at an outside entrance post and be transported to the work area and back in one vehicle so dust entrainment should not be an issue. All the dust collected through the cleaning operations including from the baghouses are washed into the generated wastewater stream and sent to the City's POTW. This is an indication that there are insignificant amount of entrained lead collected into the wastewater stream otherwise the POTW will not accept it.

In summary, there are no lead emissions generated from the clean-up and venting operations as the baghouses are not tied into any process equipment.

Current Exide lead emissions are zero with a reduction of 0.16 tpy from the 2013 TRI levels as a result of the surrender of the CMOP permit.

Other permanent actions include switching to unleaded gasoline fuel in early 2008 for the nearby Bristol Motor Speedway and Racetrack (BMSR) racing vehicles. Is it a coincidence that the highest 3-month average reported in the 2005-2007 monitoring time period also occurred during a racing event in 2007? More detailed information about the racetrack time events and measured lead values is provided in Appendix B as a weight-of-evidence. It seems that events in meteorology coupled with leaded emissions from the racetrack prior to 2009 have contributed to the exceedances of the design values in 2007 and 2008. The reported 2007 TRI emissions from the Exide facility was the lowest of the 2005-2013 record at 0.65 tpy as shown in Table 4-1. The

Exide facility has reduced its operations recently and production has been suspended indefinitely as of October 6, 2013.

It was not necessary for Tennessee to adopt or implement additional control measures for this nonattainment area because the only source of lead emissions, Exide Technologies, has permanently shut down.

iii.) Section 110 and Part D requirements (CAA Section 107(d)(3)(E)(v))

For purposes of redesignation, a state must meet all requirements of Section 110 and Part D that were applicable prior to submittal of the complete redesignation request. Subpart 1 of Part D consists of general requirements applicable to all areas which are designated nonattainment based on a violation of the NAAQS. Subpart 5 of Part D consists of more specific requirements applicable to lead.

i.) Section 110(a) requirements

Section 110(a) of Title I of the CAA contains the general requirements for a SIP. Section 110(a)(2) provides that the implementation plan submitted by a state must have been adopted by the state after reasonable public notice and hearing, and that, among other things, it must include enforceable emission limitations and other control measures, means or techniques necessary to meet the requirements of the CAA; provide for establishment and operation of appropriate devices, methods, systems and procedures necessary to monitor ambient air quality; provide for implementation of a source permit program to regulate the modification and construction of any stationary source within the areas covered by the plan; include provisions for the implementation of Part C, prevention of significant deterioration (PSD) and Part D, NSR permit programs; include criteria for stationary source emission control measures, monitoring, and reporting; include provisions for air quality modeling; and provide for public and local agency participation in planning and emission control rule development. In Tennessee's October 19, 2009 infrastructure SIP submission, Tennessee verified that the State fulfills the requirements of Section 110(a)(2) of the Act.

Section 110(a)(2)(D) also requires State plans to prohibit emissions from within the State which contribute significantly to nonattainment or maintenance areas in any other State, or which interfere with programs under Part C to prevent significant deterioration of air quality or to achieve reasonable progress toward the national visibility goal for Federal class I areas (national parks and wilderness areas). In order to assist States in addressing their obligations regarding regionally transported pollution, Tennessee has adopted and implemented the various major Programs related to the interstate transport of pollution. TAPCR Chapters 1200-03-22 (Lead Emissions Standards), 1200-03-24 (Stack Height Regulations), 1200-03-30 (Acid Rain Permits and Compliance), 1200-03-27 (Nitrogen Oxides – Budget Trading Program), and 1200-03-14 and 27 (Clean Air Interstate Rule) all address Congressional and U.S.EPA concerns over the transport of emissions of regulated pollutants beyond our State borders. Additionally, all new major sources and major modifications in the state are subject to PSD and NNSR program to help achieve the lead standard.

Based upon U.S. EPA's "Guidance on Infrastructure SIP Elements Required Under Sections 110(a)(1) and (2) for the 2008 Lead (Pb) National Ambient Air Quality Standards (NAAQS)" (dated 10/14/2011), the physical properties of lead prevent lead emissions from experiencing the same travel or formation phenomena as PM2.5 or ozone. Lead concentrations sharply decrease with the distance from a lead source. Only large sources in close proximity to state boundaries could contribute significantly to nonattainment in, or interfere with maintenance by, any other state.

This nonattainment area is not in close proximity to Tennessee's border. Therefore, lead sources in this area do not contribute significantly to nonattainment, or interfere with maintenance, of the NAAQS in another state, or interfere with measures required to prevent significant deterioration of air quality.

ii.) Section 172(c) requirements

This Section contains general requirements for nonattainment plans. The requirements for reasonable further progress, identification of certain emissions increases, and other measures needed for attainment will not apply for redesignations because they only have meaning for areas not attaining the standard. The requirements for an emission inventory will be satisfied by the inventory requirements of the maintenance plan. Chapters Four and Five discuss this requirement in more detail.

iii.) Conformity

The state must work with U.S. EPA to show that its SIP provisions are consistent with the Section 176(c)(4) conformity requirements. The redesignation request should include conformity procedures, if the state already has these procedures in place. If a state does not have conformity procedures in place at the time that it submits a redesignation request, the state must commit to follow U.S. EPA's conformity regulation upon issuance, as applicable. Furthermore, in U.S. EPA's final rule it was stated that In light of the elimination of lead additives from gasoline, transportation conformity does not apply to the lead NAAQS [73 FR 67043].

iv.) Maintenance plans (CAA Section 107(d)(3)(E)(iv))

Section 107(d)(3)(E) stipulates that for an area to be redesignated, U.S. EPA must fully approve a maintenance plan that meets the requirements of Section 175(A). The maintenance plan will constitute a SIP revision and must provide for maintenance of the relevant NAAQS in the area for at least 10 years after redesignation. Section 175(A) further states that the plan shall contain such additional measures, if any, as may be necessary to ensure such maintenance.

In addition, the maintenance plan shall contain such contingency measures as the Administrator deems necessary to ensure prompt correction of any violation of the NAAQS. At a minimum, the contingency measures must include a requirement that the state will implement all measures contained in the nonattainment SIP prior to redesignation.

States seeking redesignation of a nonattainment area should consider the following provisions:

- a) attainment inventory;
- b) maintenance demonstration;
- c) monitoring network;
- d) verification of continued attainment; and
- e) contingency plan.

Chapter Six discusses this requirement in more detail.

CHAPTER THREE

LEAD MONITORING

CAA Section 107(d)(3)(E)(i)

Lead Data Analysis and Supporting Documentation – Bristol Lead Nonattainment Area

The Bristol, Tennessee Exide plant was constructed and began operations in 1994 in Sullivan County in upper East Tennessee. The Exide facility emits particulate lead emissions during the process of manufacturing lead acid batteries and was required to set up and maintain an ambient air monitoring network for lead. The Tennessee Division of Air Pollution Control (TDAPC) also arranged to operate a separate lead monitor collocated with one of the Exide operated monitoring sites on company owned property. Later a separate monitoring site was established for TDAPC samplers off site in close proximity to the western most Exide site. EPA revised the National Ambient Air Quality Standard (NAAQS) for lead on October 15, 2008 which became effective on January 12, 2009 reducing the NAAQS from a level of $1.5 \mu\text{g}/\text{m}^3$ to a level of $0.15 \mu\text{g}/\text{m}^3$. The following graphics show the location of the Exide facility, the area designated as nonattainment for lead and the locations of the lead sampling sites around the Exide facility.

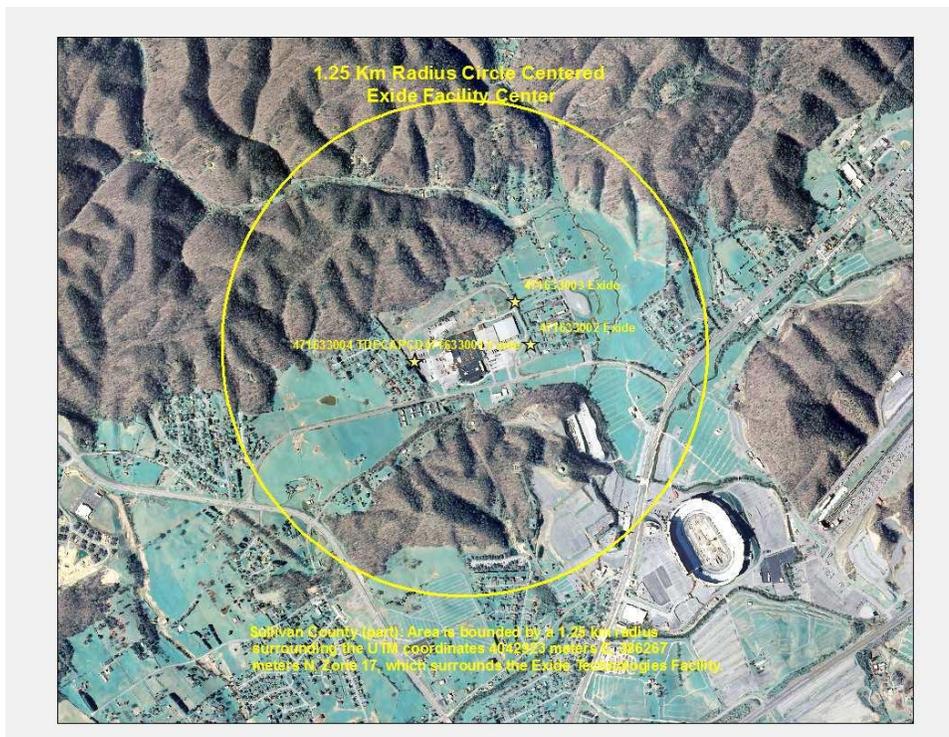


Figure 3-1 - Map of the partial Sullivan County, TN- nonattainment area and monitors locations



Figure 3-2 – Locations of the Lead sampling sites around the Exide facility

At that time the lead monitoring network located around the Exide facility in Bristol, Tennessee had reported lead data in excess of the revised lower NAAQS standard. The following table displays the historic data including the three month running average reported in March of 2007, with a value of 0.26 ug/m³ lead, upon which the Exide area was designated nonattainment with by EPA.

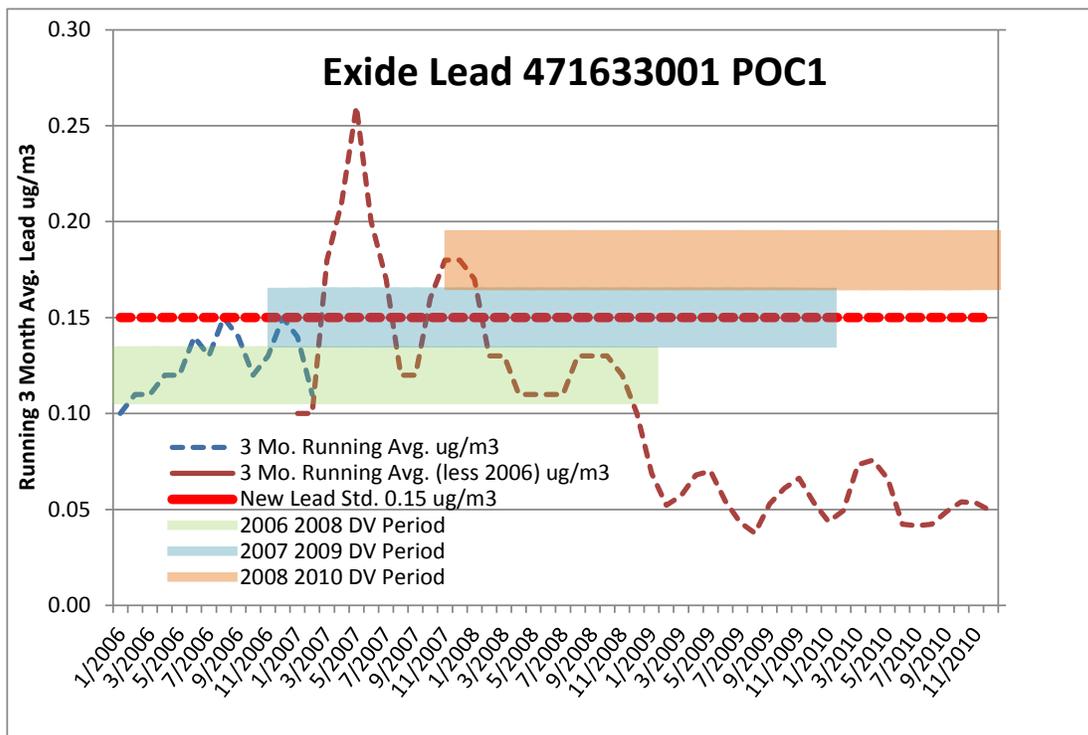


Table 3-1 – Lead Monitoring Historical Data Trend

The following table shows the site history describing the monitoring sites and their period of data collection:

AQS ID	Operated By	Years in Operation
471633001	EXIDE Company	1994 to 2014
471633002	EXIDE Company	1994 to 2014
471633003	EXIDE Company	1994 to 2014
471633004	EXIDE TDEC APCD	2010 to 2014
471634002	EXIDE TDEC APCD	1994 to 2009

Table 3-2 – Lead Monitoring Years of Operation

Table 3-3 below provides the most recent 4 year data recoveries for both the company and TDAPC operated lead monitoring sites. The data recovery for the 4 monitoring sites are satisfactory except for the data reported by the company operated sites during calendar year 2011. The lowered data recovery with approximately 50% of the required data reported was the result of the company operating their monitoring sites off schedule. The actual number of filters collected was un-changed; however, the days the filters were collected on were off by 1 day resulting in the lowered collection recovery percentages. The data collected was evaluated by EPA, including the off schedule data sets and compared to the state operated monitoring sites data and found to be comparable and sufficient for use in the clean data determination published on 9/28/2012 (77 FR 52232) by EPA.

MONITOR OPERATOR	SITE ID	NUM	PCT	NUM	PCT	NUM	PCT	NUM	PCT
		OBS YEAR	YEAR						
		2010	2010	2011	2011	2012	2012	2013	2013
EXIDE Company	47-163-3001	121	99	59	49	122	100	112	92
EXIDE Company	47-163-3002	122	100	57	47	122	100	107	88
EXIDE Company	47-163-3003	121	99	59	49	122	100	114	93
EXIDE TDEC APCD	47-163-3004	60	98	60	98	59	97	60	98

Table 3-3 – Lead Monitoring Most Recent 2010-2013 Data Recovery

The design values calculated for each of the sites for the 2010 to 2013 DV periods are as follows:

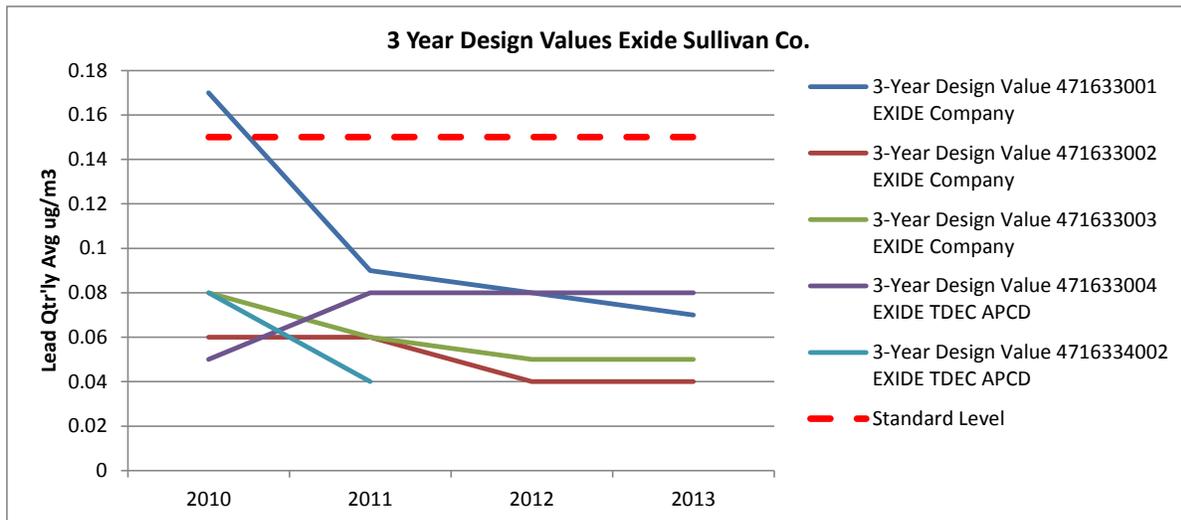


Table 3-4 – Lead Monitoring 2010-2013 Design Values

As described above, the 3-year design value for lead (3-month running average over 3 consecutive years), was found to be in excess of the standard as late as early 2010 (2008 to 2010 DV period). This was the result of a 3-month running average reported for January 2008. This 3-month running average was 0.17 ug/m³ lead and was the last 3-month running average reported to be in excess of the standard by site 471633001. The next 3-year design value reported in 2011 for the 3-year period running from 2009 to 2011 was noted to be below the standard including the design values reported for 2012 and 2013. EPA was requested by the State of Tennessee, Department of Environment and Conservation (TDEC), to grant a “Clean Data Determination” for the Bristol lead nonattainment area on April 4, 2012 based on the attaining data reported for the 2009 to 2011 time period indicating that the area has now met the Lead NAAQS with a 3-year design value of 0.08 ug/m³. EPA approved this request effective September 28, 2012 as published in the Federal Register at 77 FR 52232 on 9/28/2012. EPA notes: “this determination of attaining data is based upon complete, quality-assured and certified ambient air monitoring data” being loaded into the EPA AQS subsystem for this area.

The general air quality trends for the lead nonattainment area in Bristol, Tennessee can also be depicted over time by evaluation of the annual average lead concentrations. Although these averages are not same as the design values used for attainment decision making purposes, they do provide an indication of the general recent overall improvements in lead air quality for the Bristol area, in particular when compared to the 1994 to 2008 timeframes prior to the clean data determination by EPA.

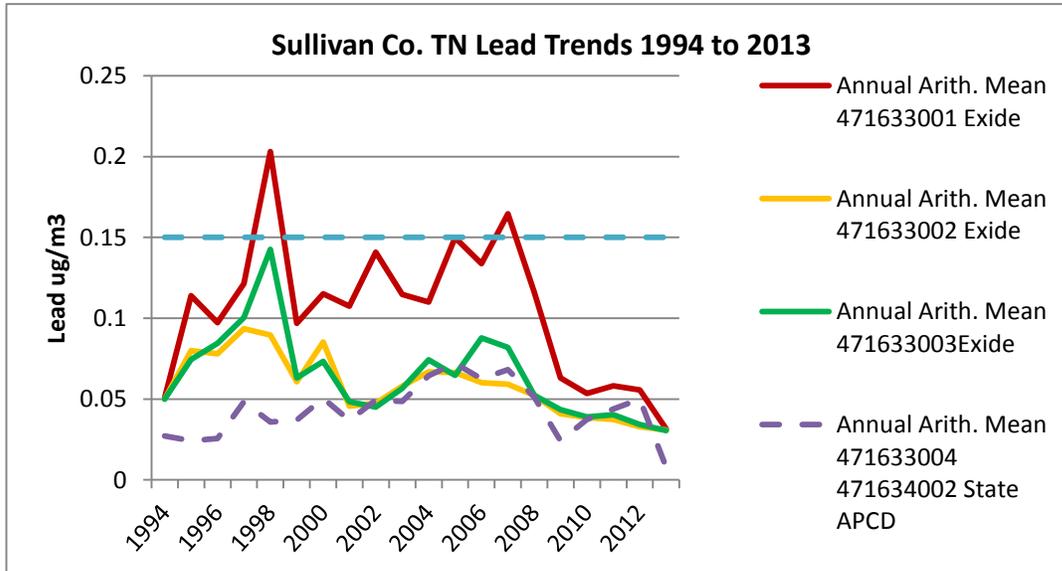


Table 3-5 – Sullivan County Lead Monitoring Trends 1994-2013

Lead Data Analysis and Supporting Documentation – Requirements for Redesignation

Requirement 1 of 4

A demonstration that the NAAQS for annual lead, as published in 40 CFR 50.12, has been attained.

Demonstration

A listing of the design values from 2008 through 2013 are shown in Table 1. The 2009 to 2011 attaining data reported a design value of 0.09 ug/m³ indicating that the area has now met the Lead NAAQS.

Requirement 2 of 4

Ambient monitoring data quality assured in accordance with 40 CFR 58.10, recorded in the U.S. EPA air quality system (AQS) database, and available for public view.

Demonstration

Tennessee has quality assured all data shown in Appendix E (2009-2013) in accordance with 40 CFR 58.10 and all other federal requirements. TDAPC has recorded the data in the AQS database and, therefore, the data are available to the public.

Requirement 3 of 4

In accordance with 40 CFR Part 50, Appendix R, the lead NAAQS is met at a monitoring site when the identified design value is valid and less than or equal to 0.15 ug/m³. A lead design value that meets the NAAQS (*i.e.* , 0.15 ug/m³ or less), is considered valid if it encompasses 36 consecutive valid 3-month site means

(specifically for a 3-year calendar period and the two previous months).

For sites that begin monitoring lead after this rule is effective but before January 15, 2010, lead design values that meet the NAAQS will be considered valid if it encompasses at least 34 consecutive valid 3-month means (specifically encompassing only the 3-year calendar period). This is the case for this monitoring site as demonstrated, and discussed in detail, in Tennessee’s April 4, 2012 clean data request, which was based on the 2009-2011 monitoring data.

Background

Table 1 (shown on page 6) and also shown below displays the monitoring data trend for the 3-year design values for the calendar period 2008-2013 that were retrieved from the U.S. EPA AQS. Also included are monitoring data collected and analyzed to date for the 2011-2013 design value.

Demonstration

Table 1 - Monitoring data for the partial Sullivan County, TN Area for 2008 – 2013

		3-Yr Design Value - Lead Max Quarterly Avg. (ug/m3)			
Site Operator	AQS ID	2008 to 2010	2009 to 2011	2010 to 2012	2011 to 2013
Exide Co.	471633001	0.17	0.09	0.08	0.07
Exide Co.	471633002	0.06	0.06	0.04	0.04
Exide Co.	471633003	0.08	0.06	0.05	0.05
TDEC APC	471633004	0.05	0.08	0.08	0.08

Source: U.S. EPA Air Quality System (AQS); <http://www.epa.gov/ttn/airs/airsaqs/index.htm>

A design value (dv) is considered valid only when minimum data completeness requirements are met.

The design values calculated for the partial Sullivan County area demonstrate that the TMRA lead NAAQS has been attained. The area's design values have remained consistently low since 2010.

Requirement 4 of 4

A commitment that once redesignated, the state will continue to operate an appropriate monitoring network to verify the maintenance of the attainment status.

Demonstration

TDAPC commits to continue monitoring lead levels at this site as indicated in Figures 3-1, 3-2, and Table 1. TDAPC will consult with U.S. EPA Region 4 prior to making changes to the existing monitoring network, should changes become necessary in the future. TDAPC will continue to quality assure the monitoring data to meet the requirements of 40 CFR Part 58 and all other federal requirements. TDAPC will enter all data into AQS on a timely basis in accordance with federal guidelines. Additionally, in light of the shutdown of the Exide facility, TDAPC further commits to the following requirements:

1. Require that if the facility were to ever restart either under the previous owner or under new owners, that a permit condition be applied that requires a monitoring network for lead to be established and a new monitoring plan and the QCQA documentation provided to the Tech Secretary for approval 90 days prior to start up and within 90 days of reaching maximum process rate, have in operation the approved lead monitoring network.
2. Operate existing state ambient lead monitor for a period of 2 years from the date of re-designation to attainment. (This would provide an additional 3 complete years of monitored data from 2015 through 2017).
3. After the state operated monitor has ceased operation as described in (2) above, restart and operate the state ambient lead monitor to coincide with the company operated lead monitoring network in (1) above such that the state operated monitor would be in operation no later than 90 days after the facility start up regardless of actual production levels.
4. Require the current or any new owners to agree to provide notifications to the Technical Secretary of any planned site demolition activity or soil disturbance associated with new construction on site. The Technical Secretary may initiate ambient air monitoring for lead if it is determined that demolition or soil disturbance activity may impact air quality in the surrounding areas. Any construction permit that would be issued by the Division for new permits at this site must include language providing for this notification to be made by the permittee to the Technical Secretary.

CHAPTER FOUR

EMISSION INVENTORY

CAA Section 107(d)(3)(E)(iii)

U.S. EPA's redesignation guidance requires the submittal of a comprehensive inventory of lead emissions representative of the year when the area achieves attainment of the TMRA lead air quality standard. Tennessee also must demonstrate that the improvement in air quality between the year that violations occurred and the year that attainment was achieved is based on permanent and enforceable emission reductions. Other emission inventory related requirements include a projection of the emission inventory to a year at least 10 years following redesignation; a demonstration that the projected level of emissions is sufficient to maintain the revised lead standard; and a commitment to provide future updates of the inventory to enable tracking of emission levels during the 10-year maintenance period.

The comprehensive inventory includes emissions of lead from point sources. Tennessee does not have area, mobile, non-road, or marine/air/rail sources of lead emissions that contribute to nonattainment. The only point source of emissions in this nonattainment area is the Exide facility. Additionally, in regard to lead emissions trends for the facility, reported TRI data for the period 2005-2013 are shown below in table 4-1.

Table 4-1 Exide TRI Form R Lead Emissions (Tons Per Year)

Year	Stack	Fugitive	Total
2005	0.75	0.04	0.79
2006	0.75	0.04	0.79
2007	0.62	0.03	0.65
2008	0.62	0.09	0.71
2009	0.62	0.09	0.71
2010	0.64	0.10	0.74
2011	0.64	0.10	0.74
2012	0.40	0.00	0.40
2013	0.16	0.00	0.16

Requirement 1 of 5

A comprehensive emission inventory of lead sources completed for the base year.

Background

The point source data are taken from the Exide facility and the area source category data from the 2008 ver.2. U.S. EPA National Emissions Inventory (NEI) reporting program. The period coincides with nonattainment air quality in the partial Sullivan County nonattainment area.

Because lead is more source-specific, the basis for the base year point inventory is the actual 2010 Pb emissions reported by Exide Lead Company, as it is the only source of Pb emissions above 0.5 tpy within the nonattainment area (Appendix C). These emissions were calculated by data collected through stack tests and the application of AP-42 emissions factors for each source and quality assured by TDEC.

Area sources are only required to be submitted for the National Emissions Inventory (NEI) every three years, according to the Air Emissions Reporting Rule (AERR). The public release of the NEI that includes area sources is the 2008 NEI v.2. Area source emissions by SCC codes were obtained from the Emissions Inventory System (EIS) maintained by EPA (Appendix D).

Nonroad emissions are normally derived from the Nonroad Model. However, in using the EIS Gateway Report Tool, no lead emissions for Sullivan County were found in the in the 2008 v2 of the NEI. This is supported by Pb not being included as a pollutant in the Nonroad 2008a model. Off-road categories (air, rail and commercial marine vessel) were pulled from the 2008 NEI v.2 release. Airports are in the NEI as point sources, but are included as nonroad in this SIP. Aircraft, rail and commercial marine vessels are included in the NEI as nonpoint, but are included as nonroad in this SIP.

Similarly for the Onroad emissions of Pb, no emissions were found in the 2008 v2 of the NEI. This is supported by Pb not being included as a pollutant in the MOVES 2010b model and the 2008 NEI having no Pb emissions listed for the onroad source categories. Therefore, a dash has been inserted in Table 4-1 as a place marker for the Nonroad and Onroad emission source categories.

The partial county fraction was calculated as the ratio of human population in the nonattainment part to the total population of Sullivan County.

The human population in the nonattainment part of Sullivan County was estimated as the total of human population in census blocks whose geographical centroids fall inside of the nonattainment area boundary.

According to the 2010 Census data, the human population in the nonattainment part of Sullivan County is 291, and the total population in Sullivan County is

156,823. Therefore, the partial county fraction is $291/156823 = 0.19\%$. The detail of this analysis is shown in Appendix E.

Table 4-2 2010 Base Year Pb Emissions for the Bristol NAA (Pounds Per Year)

Emissions for Bristol NAA (PPY)							
<i>Year</i>	<i>Point</i>	<i>Nonroad</i> ⁽²⁾	<i>Area</i> ⁽³⁾			<i>Onroad</i> ⁽⁴⁾	<i>Total</i>
			NAA %	County	EMS		
2010	1,480 ⁽¹⁾	-	0.19	66	0.13 (0.0001 tpy)	-	1480.13 (0.74 tpy)

⁽¹⁾ This total value (stack emissions) is obtained from Source Data. Fugitive emissions of 200 ppy (or 0.1 tpy) were reported in the 2010 TRI data. Reported TRI emissions (Appendix B) are 1,420 ppy (2008), 1,420 ppy (2009), and 1,480 ppy (2010).

⁽²⁾ Area emissions apportioned for the nonattainment area (NAA) from the county total based on population percentage of the NAA relative to the county as explained in Appendix C.

⁽³⁾ No lead emissions were found in Sullivan County for the Nonroad sector in using the EIS Gateway Tool.

⁽⁴⁾ No lead emissions were found in Sullivan County for the Onroad sector in using the EIS Gateway Tool.

Demonstration

The 2010 is used as the base year (2009-2011 dv) for the purpose of this submittal. 2010 Exide point source emissions and the 2008 ver.2 NEI data were submitted to U.S. EPA with Tennessee’s emission inventory lead nonattainment area SIP on April 11, 2013. The detailed lead emission inventory projection information for the partial Sullivan County area is provided in Table 4 under Requirement Three of this Chapter.

Requirement 2 of 5

A projection of the emission inventory to a year at least 10 years following redesignation.

Demonstration

TDAPC prepared a comprehensive future year inventory for the partial Sullivan County area. See Requirement 3 of 5 under Requirement Three of this Chapter.

Requirement 3 of 5

A demonstration that the projected level of emissions is sufficient to maintain the lead standard.

Background

In consultation with U.S. EPA, TDAPC selected the year 2022 as the maintenance year for this redesignation request. This document contains projected emissions inventories for 2015 and 2022.

Maintenance is demonstrated when the future-year (2022) projected emission totals are below or at the 2012 attainment year totals.

Demonstration

Table 4-3 Partial Sullivan County, TN Lead Emission Inventory Totals for Base Year 2010, Attainment Year 2012, and Projected 2015 and 2022 (tpy)

Source	2010 Base	2012 Attainment	2015 Interim	2022 Maintenance	Safety Margin
Exide ^{(5), (6)}	0.74 ⁽¹⁾	0.41 ⁽²⁾	0.02 ⁽³⁾	0.02 ⁽⁴⁾	0
TOTAL	0.74	0.41	0.02	0.02	0

NOTE:

⁽¹⁾ Point source emissions of 0.64 tpy measured through stack testing and reported by the Exide facility. Fugitives of 0.1 tpy as reported in the 2010 TRI data for the facility. Area source emissions of 0.0001 tpy. No onroad or nonroad emissions were reported in the 2008 NEI. Total emissions of 0.74 tpy.

⁽²⁾ Reported TRI data are 0.4 tpy (2012) and fugitive emissions of 0.1 tpy (2010) for total emissions of 0.41 tpy for the facility due to idling of operations and production suspension as of October 6, 2013.

⁽³⁾ 2015 interim emissions are projected to be (0.02 tpy-fugitive emissions of 0.01 tpy and area source emissions of 0.0001 tpy (2010) or 0.01 tpy conservatively assessed for growth) and zero point source emissions since the facility has shut down and surrendered its operating permit(s) on October 30, 2014 (see Appendix F).

⁽⁴⁾ 2022 emissions are projected to be at the 2015 levels (only area source emissions and fugitives) or below at a rate of (-.5%) employment reductions for industrial growth based on the latest Bureau of Labor Statistics (BLS) 2012-2022 national assessment for industrial growth.

⁽⁵⁾ Current conditional major (or synthetic minor) overall permitted allowable lead emissions for the Exide facility are 7.0 tpy. However, the facility has recently shut down and surrendered its permits on October 30, 2014.

⁽⁶⁾ Reported 2011, 2012, and 2013 TRI total actual lead emissions for the facility are 0.74, 0.4, and 0.16 tpy respectively due to idling of operations and production suspension as of October 6, 2013.

As shown in Table 4-3 above, lead emissions in the nonattainment area are projected to stay the same level at the 2015 interim year by 2022 or reduce to zero due to the permanent shutdown of the Exide facility in October 2014.

Furthermore, the 2008 NEI2 (in Appendix B) shows that lead emissions for the entire Sullivan County are at 1.08 tpy with no sources above 0.5 tpy except the Exide facility (reported at 0.71 tpy). Additionally, area source lead emissions for the entire county are projected to be at 0.033 tpy. No lead emissions were found in Sullivan County for the onroad or nonroad sectors in using the EIS Gateway Tool.

Requirement 4 of 5

A demonstration that improvement in air quality between the year violations occurred and the year attainment was achieved is based on permanent and enforceable emission reductions and not on temporary adverse economic conditions or unusually favorable meteorology.

Background

Ambient air quality data from all monitoring sites indicate that air quality met the NAAQS for lead in 2011-2013. U.S. EPA's redesignation guidance (p 9) states: "A state may generally demonstrate maintenance of the NAAQS by either showing that future emissions of a pollutant or its precursors will not exceed the level of the attainment inventory, or by modeling to show that the future mix of sources and emissions rates will not cause a violation of the NAAQS."

Demonstration

Based on the 1.25 km extent of the nonattainment area, which centers on the Exide facility, no additional sources of lead are expected in the future. The Exide facility is currently identified in TDAPC records as permanently shut down, and therefore, operations could not resume without Exide being considered a new source and subject to new source review provisions. No additional sources of lead are expected in the future. In the event a future source of lead may install in the area in the future, all relevant requirements at that time would be required, including new source review permitting and dispersion modeling assessments to show compliance with the NAAQS. This ensures maintenance of the lead standard into the future.

Requirement 5 of 5

Provisions for future annual updates of the inventory to enable tracking of the emission levels, including an annual emission statement from major sources.

Demonstration

In Tennessee, major point sources in all counties are required to submit air emissions information annually, in accordance with U.S. EPA's Air Emissions Reporting Requirement (AERR) Rule. TDAPC prepares a new periodic inventory for all lead sources every three years. This lead inventory will be prepared for future years as necessary to comply with the inventory reporting requirements established in the CFR. Emissions information will be compared to the 2010 base year and the 2022 projected maintenance year inventory to assess emission trends, as necessary, and to assure continued compliance with the lead standard. For non-major Pb sources in the state, emissions and emissions trend tracking will be achieved annually through our in-house NSR permitting emissions databases.

CHAPTER FIVE

CONTROL MEASURES AND REGULATIONS

CAA Section 107(d)(3)(E)(ii), 107(d)(3)(E)(iv), and 107(d)(3)(E)(v)

Requirement 1 of 6

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to implement RACM and RACT.

Background

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to submit a SIP providing for implementation of all reasonably available control measures (RACM) as expeditiously as practicable (including such reductions in emissions from existing sources in the area as may be obtained through the adoption, at a minimum, of reasonable available control technology (RACT)).

U.S. EPA's final rule (73 FR 66964) stated it is appropriate to set a threshold for RACT analysis at 0.5 tpy.

Demonstration

The Exide facility emissions exceeded the threshold of 0.5 tpy, necessitating a RACT analysis. In addition, the area which is influenced largely by Exide emissions has attained the standard prior to when any RACT analysis would have been required.

The existing emission controls in the form of fabric filters and wet scrubbers have achieved emission reductions that are permanent and enforceable and shown improvement in air quality as demonstrated by the recent monitoring design values.

They are also deemed by U.S. EPA as a RACM (and RACT) for this source category as stated in the EPA guidance document "Implementation of the 2008 Lead National Ambient Air Quality Standards Guide to Developing Reasonably Available Control Measures (RACM) for Controlling Lead Emissions. EPA-457/R-12-001, March 2012."

In addition, the Exide facility permanently shut down (in October 2014) prior to when any RACT analysis would have been required.

Requirement 2 of 6

Section 172(c)(2) of the 1990 CAA Amendments requires attainment demonstration SIPs for nonattainment areas to show reasonable further progress (RFP).

Background

U.S. EPA's final rule expected that RFP for lead nonattainment areas should be met by strict adherence to an ambitious compliance schedule which should

periodically yield significant emissions reductions, and to the extent appropriate, linear progress.

Demonstration

Because the Exide facility permanently shut down in October 2014, RFP has been met.

Requirement 3 of 6

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions.

Background

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions in the area, including the requirement for periodic revisions as determined necessary. 40 CFR 51.1008 and 40 CFR 51.117 (e)(1) require such inventory to be submitted within three years of designation (by December 31, 2013) and require a baseline emission inventory for calendar year 2010 or other suitable year to be used for attainment planning with a specified emission threshold of 0.5 tpy or more of lead emitting sources.

Demonstration

The 2010 Exide actual comprehensive emissions inventory was submitted to U.S. EPA with Tennessee's emissions inventory SIP document (as part of CAA Section 172 (c) requirements) on April 11, 2013. Point source emissions for this area were taken from the Exide Technologies Lead Company, as it is the only source of Pb emissions above 0.5 tpy within the nonattainment area. The area source category inventory was obtained from the 2008 U.S. EPA's NEI ver.2 database. Neither onroad nor nonroad emissions were reported for the area in the 2008 NEI.

Tennessee also updates its comprehensive inventory in accordance with U.S. EPA's AERR rule (i.e. emissions statements). As discussed in Chapter 4 (Requirement 5), TDAPC submits, and commits to submit, emission inventories (statements) every three years in addition to a yearly submission by December 31 for certain sources depending on their emissions thresholds (i.e., mega sources).

Requirement 4 of 6

Evidence that control measures required in past lead SIP revisions have been fully implemented.

Demonstration

There are no past control measures required in Tennessee's SIP for this area.

Requirement 5 of 6

Acceptable provisions to provide for new source review.

Background

Tennessee has a longstanding and fully implemented New Source Review (NSR) program. This is addressed in Chapter 1200-03-09-.01. This Chapter includes provisions for the Prevention of Significant Deterioration (PSD) permitting program in TDAPC rule 1200-03-09-.01(4). Tennessee's PSD program was conditionally approved on July 29, 1996 (61 FR 146) and received final approval on September 12, 1996 by U.S. EPA as part of the SIP.

Demonstration

Any facility that is not listed in the 2010 emission inventory, or for the closing of which credit was taken in demonstrating attainment, will not be allowed to construct, reopen, modify, or reconstruct without meeting all applicable NSR requirements including dispersion modeling analyses demonstrations to assess the full impact of these sources. Once the area is redesignated, TDAPC will implement NSR through the PSD program.

Requirement 6 of 6

Assure that all existing control measures will remain in effect after redesignation unless the State demonstrates through modeling that the standard can be maintained without one or more control measures.

Demonstration

Tennessee commits to attain and maintain the Pb NAAQS for the area and will require control measures after redesignation for future sources coming to the area unless the State demonstrates through modeling that the standard can be maintained without one or more control measures.

Tennessee, through TDEC's Legal office, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, it intends to continue enforcing all rules that relate to the emission of lead in the partial Sullivan County nonattainment area.

CHAPTER SIX

CONTINGENCY MEASURES

CAA Section 107(d)(3)(E)(v)

Requirement 1 of 4

A commitment to submit a revised plan eight years after redesignation.

Demonstration

Tennessee hereby commits to review its maintenance plan eight years after redesignation, as required by Section 175(A) of the CAA.

Requirement 2 of 4

A commitment to expeditiously enact and implement additional contingency control measures in response to exceeding specified predetermined levels (triggers) or in the event that future violations of the ambient standard occur.

Demonstration

Tennessee hereby commits to adopt and expeditiously implement necessary corrective actions in the following circumstances:

Warning Level Response:

A warning level response shall be prompted whenever a lead 3-month rolling average concentration of $0.135 \mu\text{g}/\text{m}^3$ (90% of the standard) occurs within the maintenance area. A warning level response will consist of a study to determine whether the lead value indicates a trend toward higher lead values. The study will evaluate whether the trend, if any, is likely to continue and, if so, the control measures necessary to reverse the trend taking into consideration ease and timing for implementation as well as economic and social considerations. Implementation of necessary controls in response to a warning level response trigger will take place as expeditiously as possible, but in no event later than 12 months from the conclusion of the most recent calendar year.

Should it be determined through the warning level study that action is necessary to reverse the noted trend, the procedures for control selection and implementation outlined under “action level response” shall be followed.

Action Level Response:

An action level response shall be prompted whenever the 3-month rolling average concentration of $0.143 \mu\text{g}/\text{m}^3$ (95% of the standard) or greater occurs within the maintenance area. A violation of the standard (any 3-month rolling average over a 36-month rolling average period (3-calendar years plus the preceding 2 months) exceeds $0.15 \mu\text{g}/\text{m}^3$) shall also prompt an action level response. In the event that the action level is triggered and is not found to be due to an exceptional event, malfunction, or noncompliance with a permit

condition or rule requirement, TDAPC in conjunction with the entity(ies) believed to be responsible for the exceedance will evaluate additional control measures needed to assure future attainment of the NAAQS for the lead standard. In this case, measures that can be implemented in a short time will be selected in order to be in place within 18 months from the close of the calendar year that prompted the action level. TDAPC will also consider the timing of an action level trigger and determine if additional, significant new regulations not currently included as part of the maintenance provisions will be implemented in a timely manner and will constitute our response.

Control Measure Selection and Implementation

Adoption of any additional control measures is subject to the necessary administrative and legal process. This process will include publication of notices, an opportunity for public hearing, and other measures required by Tennessee law for rulemaking or permitting.

If a new measure/control is already promulgated and scheduled to be implemented at the federal or State level, and that measure/control is determined to be sufficient to address the upward trend in air quality, additional local measures may be unnecessary. Furthermore, Tennessee will submit to U.S. EPA an analysis to demonstrate the proposed measures are adequate to return the area to attainment.

Requirement 3 of 4

A list of potential contingency measures that would be implemented in such an event.

Demonstration

Contingency measures to be considered will be based on an analysis of the suspected cause of the elevated lead levels from future entity(ies) that will be located in this area and are suspected to be contributing to the elevated levels. Measures may include improvements in applicable permitted control devices, addition of secondary control devices or improvements in housekeeping and maintenance, among other measures. It is not possible to fully develop an appropriate list of contingency measures until the cause of the elevated levels is known. Any contingency measure implemented for an operating permitted source will require a compliance plan and expeditious compliance timeline from the entity(ies) involved. Based on the shutdown of the Exide facility and the surrender of its operating permit(s) which is expected to reduce emissions of lead significantly, TDAPC has preliminarily determined that the 2008 Lead NAAQS can be achieved on a consistent basis. Since the area has already attained the standard based on monitoring and the additional shut-down of the Exide facility can further attain and maintain the Lead NAAQS, any possible exceedances of the Pb NAAQS during any three month period after December 31, 2015 (the attainment date), is likely to be a result of fugitive emissions. Nonetheless, the contingency measures as discussed below will immediately take effect to offset any increase in air quality concentrations that are expected to result from emission increases due to the likelihood of fugitive

soil dust disturbance and/or entrainment. For example, in the event of any exceedances, upon notification by TDAPC, Exide would be required to conduct a twelve minute EPA Method 9 visible emissions reading on each PB source outlet by a certified reader every day, as well as perform dye check on every filtration system that was controlling a lead source. These control measures will help to determine and detect the source of fugitive emissions so that the exceedances can be addressed immediately. Other contingency measures would be restricting traffic to and from the facility and the application of wet suppression on a daily basis and increasing the sprinkler frequency to 5 minutes every 30 minutes during daylight hours and 5 minutes every 60 minutes during nighttime hours twenty-four hours a day everyday will serve to reduce fugitive dust emissions. Each of the contingency measures will continue for a minimum 90 days and remain in place until such time as TDAPC has determined that they are no longer needed. In addition to the identified contingency measures, if an exceedance of the NAAQS occurs during any three month period after December 31, 2015 (the attainment date), within 120 days, the facility will submit an investigative study identifying the source(s) contributing to the exceedance. Exide will also develop and prepare a strategy to eliminate the likelihood of another exceedance. The 120-day review period will consist of a 30-day evaluation period immediately following a violation and then up to 90-day consultation period with the facility to determine the best course of action.

Requirement 4 of 4

A list of lead sources potentially subject to future additional control requirements.

Demonstration

TDAPC does not expect any future lead sources in this area. As discussed elsewhere in this document, any new source planning to locate in this area would be a point source that would be subject to the new source review program. Additionally, dispersion modeling analyses demonstrations would always be a contingency plan requirement for any source development in this nonattainment area whether it is subject to major NSR or not since modeling is the only way to fully assess the impact of these sources.

CHAPTER SEVEN

PUBLIC PARTICIPATION

Tennessee published notification for a public hearing and solicitation for public comment concerning the draft redesignation petition and maintenance plan in the widely distributed county publication on April xx, 2015.

The public hearing to receive comments on the redesignation request was held on May xx, 2015 in Bristol, Tennessee. The public comment period closed on May xx, 2015. Appendix G includes a copy of the public notice, and the transcript from the public hearing.

CHAPTER EIGHT

CONCLUSIONS

The partial Sullivan County lead nonattainment area has attained the 2008 3-month rolling average NAAQS for lead and complied with the applicable provisions of the 1990 Amendments to the CAA regarding redesignations of lead nonattainment areas. Documentation to that effect is contained herein. TDAPC has prepared a redesignation request and maintenance plan that meet the requirements of Section 110 (a) (1) of the 1990 CAA.

Based on this presentation, the partial Sullivan County lead nonattainment area meets the requirements for redesignation under the CAA and U.S. EPA guidance. Tennessee has performed an analysis that shows the air quality improvements are due to permanent and enforceable measures. Furthermore, because the only source of lead emissions in this area has permanently shut down, Tennessee can ensure continued compliance (maintenance) with the standard with an increasing margin of safety.

The State of Tennessee hereby requests that the partial Sullivan County lead nonattainment area be redesignated to attainment simultaneously with U.S. EPA approval of the maintenance plan provisions contained herein.

Appendix A

Air Quality System (AQS) Monitoring Data

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



User ID: EBO

RAW DATA MAX VALUES REPORT

Report Request ID: 1235011

Report Code: AMP350MX

Jul. 21, 2014

GEOGRAPHIC SELECTIONS

Tribal Code	State	County	Site	Parameter	POC	City	AQCR	UAR	CBSA	CSA	EPA Region
	47	163	3001	14129							

PROTOCOL SELECTIONS

Parameter Classification	Parameter	Method	Duration
--------------------------	-----------	--------	----------

CRITERIA

SELECTED OPTIONS

Option Type	Option Value
SINGLE EVENT PROCESSING	INCLUDE EVENTS
MERGE PDF FILES	YES
AGENCY ROLE	PQAO

SORT ORDER

Order	Column
1	STATE_CODE
2	COUNTY_CODE
3	SITE_ID
4	PARAMETER_CODE
5	POC

DATE CRITERIA

Start Date	End Date
2009 01 01	2013 12 31

APPLICABLE STANDARDS

Standard Description
CO 8-hour 1971
Lead 3-Month 2009
Lead 3-Month PM10 Surrogate 2009
Lead Quarterly 1978
NO2 Annual 1971
Ozone 8-Hour 2008
PM10 24-hour 2006
PM25 Annual 2013
SO2 1-hour 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 RAW DATA MAX VALUES REPORT

Jul. 21, 2014

(14129) Lead (TSP) LC

SITE ID: 47-163-3001 POC: 1
 COUNTY: (163) Sullivan
 CITY: (08540) Bristol
 SITE ADDRESS: 364 EXIDE DR.
 SITE COMMENTS: SITE LOCATED 150 METERS WEST OF EXIDE MANUFACTURING PLANT
 MONITOR COMMENTS: ONE OF THREE MONITORS LOCATED ON THE EXIDE PROPERTY

STATE: (47) Tennessee
 AQCR: (207) EASTERN TENNESSEE-SOUTHWESTERN VIR
 URBANIZED AREA: (0000) NOT IN AN URBAN AREA
 LAND USE: INDUSTRIAL
 LOCATION SETTING: SUBURBAN

CAS NUMBER: 7439-92-1
 LATITUDE: 36.525556
 LONGITUDE: -82.273333
 UTM ZONE:
 UTM NORTHING:
 UTM EASTING:
 ELEVATION-MSL: 468
 PROBE HEIGHT: 2

SUPPORT AGENCY: (0375) Exide Corporation
 MONITOR TYPE: INDUSTRIAL
 COLLECTION AND ANALYSIS METHOD: (107) Hi-Vol Flameless Atomic absorption
 PQAO: (0375) Exide Corporation

REPORT FOR: 2009

DURATION: 24 HOUR
 UNITS: Micrograms/cubic meter (LC)
 MIN DETECTABLE: .003

Day	MONTH											
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
1	.030				.090				.030	.040		
2			.030					.030				
3		.040				.040	.040				.030	.030
4	.090			.100	.250				.110	.050		
5			.060					.030				
6						.030	.050				.050	.030
7	.030			.030	.050				.030	.080		
8								.040				
9		.080				.030					.050	.030
10	.060			.070	.030				.040	.040		
11			.080					.030				
12						.030	.070				.090	.030
13	.040			.160	.210				.140	.030		
14			.130	.040				.100				
15		.050				.040	.070				.050	.040
16	.030			.390	.050				.030	.030		
17			.040					.050				
18		.030	.090			.040	.030				.030	.030
19	.030	.030		.070	.150				.040	.070		
20			.060					.030				
21		.050					.030				.170	.030
22	.120			.030	.090				.030	.050		
23			.110					.030				
24		.070				.190	.050				.030	.030
25	.040			.160	.030				.220	.100		
26								.030				
27						.030	.050				.050	.060
28	.030			.100	.030				.030	.260		
29			.080					.050				
30			.040			.004	.030				.030	.040
31	.030				.030					.030		
NO.:	11	7	10	10	11	9	9	10	10	11	10	10
MAX:	.120	.080	.130	.390	.250	.190	.070	.100	.220	.260	.170	.060
MEAN:	.0482	.0500	.0720	.1150	.0918	.0482	.0467	.0420	.0700	.0709	.0580	.0350
ANNUAL OBSERVATIONS:	118		ANNUAL MEAN:		.0631		ANNUAL MAX:		.390			

Note: A plus sign ("+") following a value indicates that the computed average includes one or more raw data values effected by a special event.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 RAW DATA MAX VALUES REPORT

Jul. 21, 2014

(14129) Lead (TSP) LC

SITE ID: 47-163-3001 POC: 1
 COUNTY: (163) Sullivan
 CITY: (08540) Bristol
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 MONITOR COMMENTS: ONE OF THREE MONITORS LOCATED ON THE EXIDE PROPERTY

STATE: (47) Tennessee
 AQCR: (207) EASTERN TENNESSEE-SOUTHWESTERN VIR
 URBANIZED AREA: (0000) NOT IN AN URBAN AREA
 LAND USE: INDUSTRIAL
 LOCATION SETTING: SUBURBAN

CAS NUMBER: 7439-92-1
 LATITUDE: 36.525556
 LONGITUDE: -82.273333
 UTM ZONE:
 UTM NORTHING:
 UTM EASTING:
 ELEVATION-MSL: 468
 PROBE HEIGHT: 2

SUPPORT AGENCY: (0375) Exide Corporation
 MONITOR TYPE: INDUSTRIAL
 COLLECTION AND ANALYSIS METHOD: (107) Hi-Vol Flameless Atomic absorption
 PQAO: (0375) Exide Corporation

REPORT FOR: 2010

DURATION: 24 HOUR
 UNITS: Micrograms/cubic meter (LC)
 MIN DETECTABLE: .03

Day	MONTH											
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
1		.110				.030	.090				.070	.030
2	.030			.050	.030				.080	.040		
3			.030									
4		.200				.030	.040	.040			.030	.030
5	.030			.030	.070				.030	.050		
6			.030					.030				
7		.170				.030	.080				.030	.030
8	.030			.050	.030				.030	.050		
9			.050					.100				
10		.030				.040	.030				.060	.030
11	.030			.030	.030				.060	.120		
12			.070					.030				
13		.030				.080	.030				.040	.090
14	.050			.030	.070				.110	.030		
15			.650					.030				
16		.030				.030	.040				.030	.060
17	.050			.080	.030				.030	.060		
18			.030					.030				
19		.070				.030	.030				.070	.030
20				.030	.080				.060	.070		
21			.040					.030				
22		.040				.030	.040				.070	.030
23	.030			.030	.030				.050	.040		
24			.100					.070				
25		.040				.030	.030				.030	.030
26	.030			.090	.060				.050	.090		
27			.040					.070				
28		.030				.030	.030				.030	.030
29	.060			.030	.030				.060	.030		
30			.030					.050				
31							.030					.090
NO.:	9	10	10	10	10	10	11	10	10	10	10	11
MAX:	.060	.200	.650	.090	.080	.080	.090	.100	.110	.120	.070	.090
MEAN:	.0378	.0750	.1070	.0450	.0460	.0360	.0427	.0480	.0560	.0580	.0460	.0436
ANNUAL OBSERVATIONS:		121		ANNUAL MEAN:	.0534	ANNUAL MAX:	.650					

Note: A plus sign ("+") following a value indicates that the computed average includes one or more raw data values effected by a special event.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 RAW DATA MAX VALUES REPORT

Jul. 21, 2014

(14129) Lead (TSP) LC

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STATE: (47) Tennessee
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 URBANIZED AREA: (0000) NOT IN AN URBAN AREA
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 LOCATION SETTING: SUBURBAN

CAS NUMBER: 7439-92-1
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 UTM ZONE:
 UTM NORTHING:
 UTM EASTING:
 ELEVATION-MSL: 468
 PROBE HEIGHT: 2

SUPPORT AGENCY: (0375) Exide Corporation
 MONITOR TYPE: INDUSTRIAL
 COLLECTION AND ANALYSIS METHOD: (107) Hi-Vol Flameless Atomic absorption
 PQAO: (0375) Exide Corporation

REPORT FOR: 2011

DURATION: 24 HOUR
 UNITS: Micrograms/cubic meter (LC)
 MIN DETECTABLE: .03

Day	MONTH											
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
1			.140			.120	.100				.070	
2		.030		.030	.070				.030	.030		.120
3	.050							.040				
4			.040			.040	.030				.030	
5		.030		.030	.080				.030	.050		.170
6	.030							.030				
7			.140			.140	.060				.240	
8		.030		.100	.050				.030	.050		.040
9	.030							.030				
10			.180			.030	.030				.030	
11		.030		.060	.050				.030	.090		.040
12	.030							.030				
13			.030			.060	.060				.030	
14		.050		.240	.030				.230	.030		.140
15	.030							.030				
16			.060			.030	.030				.030	
17		.120		.120	.030				.030	.100		.030
18	.030							.030				
19			.070			.030	.030				.030	
20		.040		.030	.030				.030	.030		.080
21	.030							.030				
22			.030			.030	.040					
23		.080		.030	.030				.030	.050	.030	.030
24	.130							.210				
25			.030			.030	.030					
26		.030		.100	.030				.050	.200	.030	.070
27	.030							.030				
28			.030			.050	.060					
29				.030	.060				.030	.030	.030	.040
30	.100		.030					.090				
31							.030					
NO.:	10	9	11	10	10	10	11	10	10	10	10	10
MAX:	.130	.120	.180	.240	.080	.140	.100	.210	.230	.200	.240	.170
MEAN:	.0490	.0489	.0709	.0770	.0460	.0560	.0455	.0550	.0520	.0660	.0550	.0760
ANNUAL OBSERVATIONS:		121		ANNUAL MEAN:	.0582	ANNUAL MAX:	.240					

Note: A plus sign ("+") following a value indicates that the computed average includes one or more raw data values effected by a special event.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 RAW DATA MAX VALUES REPORT

Jul. 21, 2014

(14129) Lead (TSP) LC

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 PROBE HEIGHT: 2

SUPPORT AGENCY: (0375) Exide Corporation
 MONITOR TYPE: INDUSTRIAL
 COLLECTION AND ANALYSIS METHOD: (107) Hi-Vol Flameless Atomic absorption
 PQAO: (0375) Exide Corporation

REPORT FOR: 2012

DURATION: 24 HOUR
 UNITS: Micrograms/cubic meter (LC)
 MIN DETECTABLE: .03

Day	MONTH											
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
1	.030		.030					.030				
2						.030	.030				.030	.130
3		.050		.030	.030				.030	.030		
4	.040		.030					.030				
5						.030	.050				.120	.080
6		.030		.030	.030				.080	.040		
7	.090		.070					.040				
8						.050	.030				.030	.040
9		.030		.030	.030				.060	.040		
10	.040		.030					.030				
11						.060	.040				.100	.030
12		.030		.040	.030				.130	.080		
13	.030		.030					.040				
14						.130	.030				.130	.050
15		.040		.030	.170				.040	.030		
16	.030		.030					.070				
17						.030	.030				.120	.080
18		.030		.030	.040				.030	.040		
19	.030		.030					.030				
20						.090	.030				.150	.050
21		.040		.030	.050	.050			.050	.050		
22	.420		.070					.060				
23						.030	.030				.030	.030
24		.030		.030	.090				.180	.230		
25	.060		.030					.030				
26						.070	.040				.110	.060
27		.100		.030	.030				.080	.030		
28	.030		.050					.040				
29						.070	.030				.080	.030
30				.070	.030				.030	.030		
31	.100		.030					.090				
NO.:	11	9	11	10	10	11	10	11	10	10	10	10
MAX:	.420	.100	.070	.070	.170	.130	.050	.090	.180	.230	.150	.130
MEAN:	.0818	.0422	.0391	.0350	.0530	.0582	.0340	.0445	.0710	.0600	.0900	.0580
ANNUAL OBSERVATIONS:		123		ANNUAL MEAN:	.0557		ANNUAL MAX:	.420				

Note: A plus sign ("+") following a value indicates that the computed average includes one or more raw data values effected by a special event.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 AIR QUALITY SYSTEM
 RAW DATA MAX VALUES REPORT

Jul. 21, 2014

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 UTM NORTHING:
 UTM EASTING:
 ELEVATION-MSL: 468
 PROBE HEIGHT: 2

SUPPORT AGENCY: (0375) Exide Corporation
 MONITOR TYPE: INDUSTRIAL
 COLLECTION AND ANALYSIS METHOD: (107) Hi-Vol Flameless Atomic absorption
 PQAO: (0375) Exide Corporation

REPORT FOR: 2013

DURATION: 24 HOUR
 UNITS: Micrograms/cubic meter (LC)
 MIN DETECTABLE: .03

Day	MONTH												
	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	
1	.030			.030	.030				.030	.030			
2			.030					.030					
3		.030				.030	.030				.030		
4	.030			.030	.030				.030	.030			
5			.050					.030					
6		.050				.030	.030				.030	.030	
7	.080			.030	.030				.030	.030			
8			.030					.030					
9		.030				.030	.030				.030		
10	.050			.080	.030				.030	.030			
11			.030					.030					
12		.030				.030	.030				.030	.030	
13	.030			.030	.030				.030	.030			
14			.030					.030					
15		.030				.030	.030				.030		
16	.030			.030	.030				.030	.030			
17			.030					.030					
18		.030				.030	.030				.030	.030	
19	.040			.030	.030				.030	.030			
20			.030					.030					
21		.030				.030	.030				.030		
22	.030			.030	.030				.030	.030			
23			.030					.030					
24		.030				.030	.030				.030	.030	
25	.030			.030					.030	.030			
26			.030					.030					
27		.030				.030	.030						
28	.030			.030					.030	.030			
29			.030					.030					
30							.030			.030		.030	
31	.030									.030			
NO.:	11	9	10	10	8	9	10	10	10	10	11	9	5
MAX:	.080	.050	.050	.080	.030	.030	.030	.030	.030	.030	.030	.030	.030
MEAN:	.0373	.0322	.0320	.0350	.0300	.0300	.0300	.0300	.0300	.0300	.0300	.0300	.0300
ANNUAL OBSERVATIONS:	112		ANNUAL MEAN:		.0315		ANNUAL MAX:		.080				

Note: A plus sign ("+") following a value indicates that the computed average includes one or more raw data values effected by a special event.

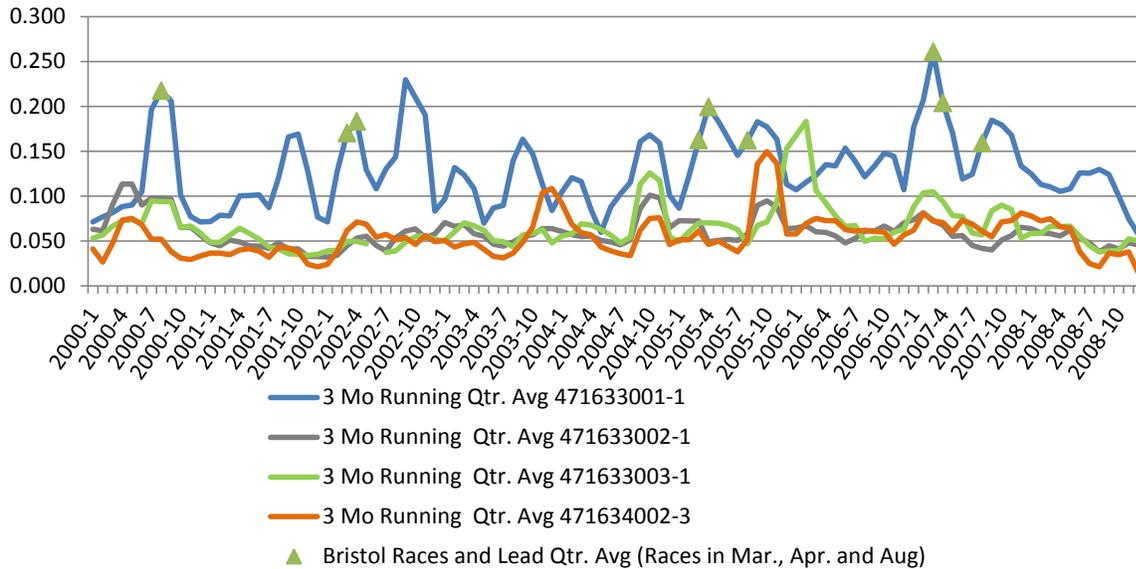
Appendix B

Exide - Bristol NASCAR Race Events Analysis

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



Bristol Race Events and Observed Exceedances



Yr Mo	Mo Avg	3 Mo Running Qtr. Avg 47163300 1-1	3 Mo Running Qtr. Avg 47163300 2-1	3 Mo Running Qtr. Avg 47163300 2-2	3 Mo Running Qtr. Avg 47163300 3-1	3 Mo Running Qtr. Avg 47163400 2-3	Bristol Races and Lead Qtr. Avg (Races in Mar., Apr. and Aug)	Sample Dates	Sample Values
2000-1	0.055	0.071	0.063	0.057	0.053	0.041			
2000-2	0.071	0.077	0.061	0.061	0.057	0.026			
2000-3	0.088	0.082	0.090	0.090	0.067	0.047			
2000-4	0.071	0.088	0.114	0.102	0.072	0.073			
2000-5	0.086	0.090	0.114	0.102	0.074	0.075			
2000-6	0.108	0.105	0.090	0.076	0.070	0.068			
2000-7	0.077	0.196	0.098	0.100	0.095	0.052			
2000-8	0.130	0.217	0.098	0.100	0.094	0.052	0.22	8/31/2000	0.33
2000-9	0.382	0.206	0.097	0.100	0.094	0.038			
2000-10	0.140	0.101	0.065	0.065	0.065	0.031			
2000-11	0.097	0.077	0.066	0.066	0.067	0.030			
2000-12	0.067	0.071	0.056	0.055	0.059	0.033			
2001-1	0.068	0.072	0.048	0.044	0.049	0.037			
2001-2	0.079	0.079	0.045	0.041	0.049	0.037			
2001-3	0.068	0.078	0.051	0.047	0.056	0.035			
2001-4	0.090	0.100	0.049	0.048	0.064	0.040			
2001-5	0.076	0.101	0.045	0.044	0.058	0.041			
2001-6	0.134	0.102	0.044	0.042	0.052	0.039			
2001-7	0.091	0.087	0.042	0.037	0.043	0.032			
2001-8	0.079	0.120	0.048	0.044	0.041	0.043			
2001-9	0.091	0.166	0.041	0.040	0.036	0.042			
2001-10	0.191	0.169	0.041	0.040	0.035	0.038			
2001-11	0.216	0.128	0.033	0.032	0.034	0.024			

Yr Mo	Mo Avg	3 Mo Running Qtr. Avg 47163300 1-1	3 Mo Running Qtr. Avg 47163300 2-1	3 Mo Running Qtr. Avg 47163300 2-2	3 Mo Running Qtr. Avg 47163300 3-1	3 Mo Running Qtr. Avg 47163400 2-3	Bristol Races and Lead Qtr. Avg (Races in Mar., Apr. and Aug)	Sample Dates	Sample Values
2001-12	0.101	0.077	0.032	0.033	0.035	0.021			
2002-1	0.066	0.071	0.032	0.033	0.039	0.024			
2002-2	0.063	0.127	0.034	0.036	0.040	0.038			
2002-3	0.085	0.170	0.045	0.048	0.050	0.062	0.17	3/27/2002	0.18
2002-4	0.234	0.183	0.053	0.056	0.050	0.071	0.18		
2002-5	0.191	0.129	0.055	0.056	0.047	0.069			
2002-6	0.124	0.108	0.045	0.044		0.054			
2002-7	0.072	0.130	0.039	0.037	0.037	0.058			
2002-8	0.128	0.144	0.053	0.045	0.039	0.051			
2002-9	0.191	0.230	0.061	0.052	0.049	0.054			
2002-10	0.112	0.210	0.064	0.056	0.055	0.046			
2002-11	0.386	0.191	0.054	0.055	0.056	0.056			
2002-12	0.133	0.083	0.058	0.056	0.052	0.049			
2003-1	0.053	0.096	0.070	0.068	0.050	0.051			
2003-2	0.064	0.132	0.066	0.061	0.060	0.043			
2003-3	0.172	0.124	0.068	0.061	0.070	0.047			
2003-4	0.160	0.109	0.058	0.051	0.067	0.049			
2003-5	0.040	0.070	0.055	0.050	0.062	0.041			
2003-6	0.126	0.087	0.046	0.044	0.050	0.033			
2003-7	0.044	0.090	0.044	0.042	0.049	0.031			
2003-8	0.091	0.140	0.049	0.046	0.043	0.036			
2003-9	0.134	0.164	0.055	0.051	0.057	0.049			
2003-10	0.194	0.147	0.057	0.058	0.058	0.065			
2003-11	0.162	0.113	0.064	0.062	0.063	0.104			
2003-12	0.086	0.084	0.064	0.063	0.048	0.109			
2004-1	0.091	0.105	0.061	0.058	0.056	0.092			
2004-2	0.074	0.121	0.057	0.056	0.058	0.069			
2004-3	0.149	0.116	0.055	0.052	0.069	0.059			
2004-4	0.139	0.085	0.056	0.050	0.068	0.057			
2004-5	0.061	0.059	0.051	0.046	0.063	0.043			
2004-6	0.054	0.088	0.049	0.046	0.056	0.039			
2004-7	0.063	0.102	0.046	0.046	0.048	0.036			
2004-8	0.148	0.115	0.051	0.049	0.054	0.034			
2004-9	0.096	0.161	0.086	0.089	0.114	0.062			
2004-10	0.102	0.169	0.101	0.100	0.126	0.075			
2004-11	0.284	0.159	0.098	0.101	0.117	0.076			
2004-12	0.119	0.101	0.065	0.063	0.054	0.046			
2005-1	0.074	0.087	0.073	0.070	0.049	0.051			
2005-2	0.110	0.122	0.072	0.071	0.060	0.051			
2005-3	0.076	0.162	0.072	0.072	0.070	0.061	0.16	4/1/2005	0.31
2005-4	0.181	0.199	0.049	0.052	0.070	0.046	0.20	4/4/2005	0.23
2005-5	0.230	0.184	0.051	0.050	0.070	0.050			
2005-6	0.187	0.165	0.052	0.051	0.067	0.044			
2005-7	0.134	0.146	0.051	0.051	0.063	0.038			
2005-8	0.173	0.162	0.058	0.057	0.047	0.052	0.16	8/23/2005	0.31

Yr Mo	Mo Avg	3 Mo Running Qtr. Avg 47163300 1-1	3 Mo Running Qtr. Avg 47163300 2-1	3 Mo Running Qtr. Avg 47163300 2-2	3 Mo Running Qtr. Avg 47163300 3-1	3 Mo Running Qtr. Avg 47163400 2-3	Bristol Races and Lead Qtr. Avg (Races in Mar., Apr. and Aug)	Sample Dates	Sample Values
2005-9	0.130	0.183	0.090	0.080	0.067	0.136		8/26/2005	0.21
2005-10	0.183	0.177	0.095	0.085	0.071	0.150		8/29/2005	0.1
2005-11	0.236	0.163	0.088	0.081	0.092	0.137			
2005-12	0.113	0.113	0.064	0.054	0.153	0.058			
2006-1	0.141	0.107	0.064	0.055	0.168	0.058			
2006-2	0.085	0.116	0.067	0.056	0.183	0.070			
2006-3	0.095	0.123	0.060	0.060	0.106	0.075			
2006-4	0.167	0.135	0.060	0.060	0.092	0.073			
2006-5	0.108	0.134	0.056	0.058	0.078	0.073			
2006-6	0.131	0.154	0.048	0.050	0.066	0.063			
2006-7	0.162	0.139	0.053	0.054	0.067	0.061			
2006-8	0.168	0.122	0.061	0.065	0.050	0.062			
2006-9	0.088	0.134	0.062	0.065	0.053	0.061			
2006-10	0.109	0.148	0.067	0.058	0.052	0.060			
2006-11	0.205	0.144	0.061	0.047	0.060	0.047			
2006-12	0.131	0.107	0.070	0.059	0.063	0.057			
2007-1	0.097	0.177	0.074	0.072	0.088	0.062			
2007-2	0.093	0.207	0.082	0.080	0.104	0.081			
2007-3	0.341	0.261	0.073	0.071	0.105	0.072	0.26	3/22/2007	0.57
2007-4	0.187	0.204	0.068	0.068	0.094	0.071	0.20	3/25/2007	0.76
2007-5	0.254	0.170	0.055	0.057	0.078	0.060		3/28/2007	0.33
2007-6	0.170	0.119	0.056	0.061	0.077	0.073			
2007-7	0.087	0.125	0.045	0.053	0.059	0.069			
2007-8	0.101	0.159	0.042	0.050	0.057	0.061	0.16	8/22/2007	0.06
2007-9	0.186	0.185	0.040	0.047	0.084	0.055		8/25/2007	0.08
2007-10	0.190	0.179	0.051	0.055	0.090	0.071		8/28/2007	0.08
2007-11	0.178	0.168	0.056	0.061	0.085	0.073			
2007-12	0.170	0.134	0.065	0.063	0.053	0.081			
2008-1	0.156	0.125	0.064	0.061	0.059	0.078			
2008-2	0.074	0.113	0.059	0.053	0.059	0.073			
2008-3	0.145	0.110	0.058	0.058	0.066	0.075			
2008-4	0.120	0.105	0.056	0.060	0.066	0.066			
2008-5	0.066	0.108	0.062	0.070	0.067	0.065			
2008-6	0.130	0.126	0.053	0.057	0.055	0.038			
2008-7	0.129	0.126	0.048	0.050	0.045	0.025			
2008-8	0.119	0.130	0.038	0.040	0.038	0.021			
2008-9	0.129	0.124	0.044	0.045	0.039	0.037			
2008-10	0.141	0.100	0.041	0.041	0.040	0.035			
2008-11	0.103	0.075	0.048	0.046	0.053	0.038			
2008-12	0.056	0.058	0.046	0.044	0.050	0.015			

Appendix C

2008 NEI v2 - Sullivan County Lead (Pb)

Point and Area Source Emissions

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



2008 NEI Version 2 GPR (General Public Release)
7/13/2012 - ALD

EIS Id	County	Site Name	NAICS Codes	Facility Type	Latitude	Longitude	City	Lead (TON)
3982311	Sullivan	EASTMAN CHEMICAL COMPANY	325199		36.52222	-82.5411	KINGSPORT	0.254235
5018311	Sullivan	KING PHARMACEUTICALS, INC.	325412		36.5902	-82.1793	BRISTOL	0.000013
3812111	Sullivan	EAST TENNESSEE NATURAL GAS COMI	221210		36.44684	-82.5219	KINGSPORT	4.64E-06
14619711	Sullivan	AURORA HARDWOODS, INC	339995		36.43103	-82.3013	PINEY FLATS	0.000264
9168411	Sullivan	Tri-Cities Rgnl Tn/Va	48811	Airport	36.4722	-82.4158	Bristol/Johnson/Kin	0.116566
11008511	Sullivan	INDIAN PATH MEDICAL CENTER	48811	Airport	36.5516	-82.5152	KINGSPORT	0.000352
11438711	Sullivan	BRISTOL RGNL MEDICAL CENTER	48811	Airport	36.5868	-82.2574	BRISTOL	0.000352
11921511	Sullivan	BRENDLE'S	48811	Airport	36.5479	-82.5224	KINGSPORT	0.000352
11921611	Sullivan	RAMADA HELISTOP	48811	Airport	36.5668	-82.5165	KINGSPORT	0.000352
12007911	Sullivan	INDIAN SPRINGS	48811	Airport	36.5353	-82.4181	KINGSPORT	0.000545
12008211	Sullivan	WELLMONT HOLSTON VALLEY MEDIC	48811	Airport	36.5536	-82.5533	KINGSPORT	0.000352
12238911	Sullivan	AIR TRADE CENTER	48811	Airport	36.4189	-82.3011	JOHNSON CITY	0.000352
14487111	Sullivan	KINGSPORT	488210	Rail Yard	36.54016	-82.5557	Unknown	0.000275
335911	Sullivan	EXIDE TECHS	335911	Storage Ba	36.5236	-82.2694	BRISTOL	0.7105

Report Type : County by Data Category

Prepared by: ALD
Date: June 20, 2012

FIPS Data Category 7439921 (TON)

47163 NonPoint (Are: 0.03294667

Appendix D

2011 NEI - Sullivan County Lead (Pb)

Area Source Emissions by SCC Codes

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



state_and_st_usps_cc	county_na	data_categ	scc	data set	pollutant_desc	total_emissions	uom	
47163 TN	Sullivan	NP	2102001000	2011TNDEC	7439921 Lead	0	TON	
47163 TN	Sullivan	NP	2102002000	2011TNDEC	7439921 Lead	0.0240231	TON	
47163 TN	Sullivan	NP	2102004001	2011TNDEC	7439921 Lead	7.81425E-05	TON	
47163 TN	Sullivan	NP	2102005000	2011TNDEC	7439921 Lead	8.9866E-06	TON	
47163 TN	Sullivan	NP	2102006000	2011TNDEC	7439921 Lead	0.000946845	TON	
47163 TN	Sullivan	NP	2102011000	2011TNDEC	7439921 Lead	1.65309E-05	TON	
47163 TN	Sullivan	NP	2103001000	2011TNDEC	7439921 Lead	0	TON	
47163 TN	Sullivan	NP	2103002000	2011TNDEC	7439921 Lead	0.000380639	TON	
47163 TN	Sullivan	NP	2103004001	2011TNDEC	7439921 Lead	1.81198E-05	TON	
47163 TN	Sullivan	NP	2103005000	2011TNDEC	7439921 Lead	0	TON	
47163 TN	Sullivan	NP	2103006000	2011TNDEC	7439921 Lead	0.00031398	TON	
47163 TN	Sullivan	NP	2103007000	2011TNDEC	7439921 Lead	1.01352E-07	TON	
47163 TN	Sullivan	NP	2103011000	2011TNDEC	7439921 Lead	5.7379E-06	TON	
47163 TN	Sullivan	NP	2104004000	2011EPA_NP_NoOvrlp	7439921 Lead	0.00030464	TON	
47163 TN	Sullivan	NP	2104011000	2011EPA_NP_NoOvrlp	7439921 Lead	0.000178829	TON	
47163 TN	Sullivan	NP	2285002006	Multiple	7439921 Lead	0.000734418	TON	
47163 TN	Sullivan	NP	2310000220	2011EPA_NP_Ovrlp	7439921 Lead	0	TON	
47163 TN	Sullivan	NP	2310000660	2011EPA_NP_Ovrlp	7439921 Lead	0	TON	
47163 TN	Sullivan	NP	2501080050	2011EPA_NP_NoOvrlp	7439921 Lead	0.000106775	TON	
47163 TN	Sullivan	NP	2501080100	2011EPA_NP_NoOvrlp	7439921 Lead	5.52731E-06	TON	
47163 TN	Sullivan	NP	2810060100	2011EPA_NP_NoOvrlp	7439921 Lead	0.000226453	TON	
							0.027348824	TPY
							54.69764886	PPY

Appendix E

2010 Pop In and Around Lead (Pb) NA Area Block Level

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



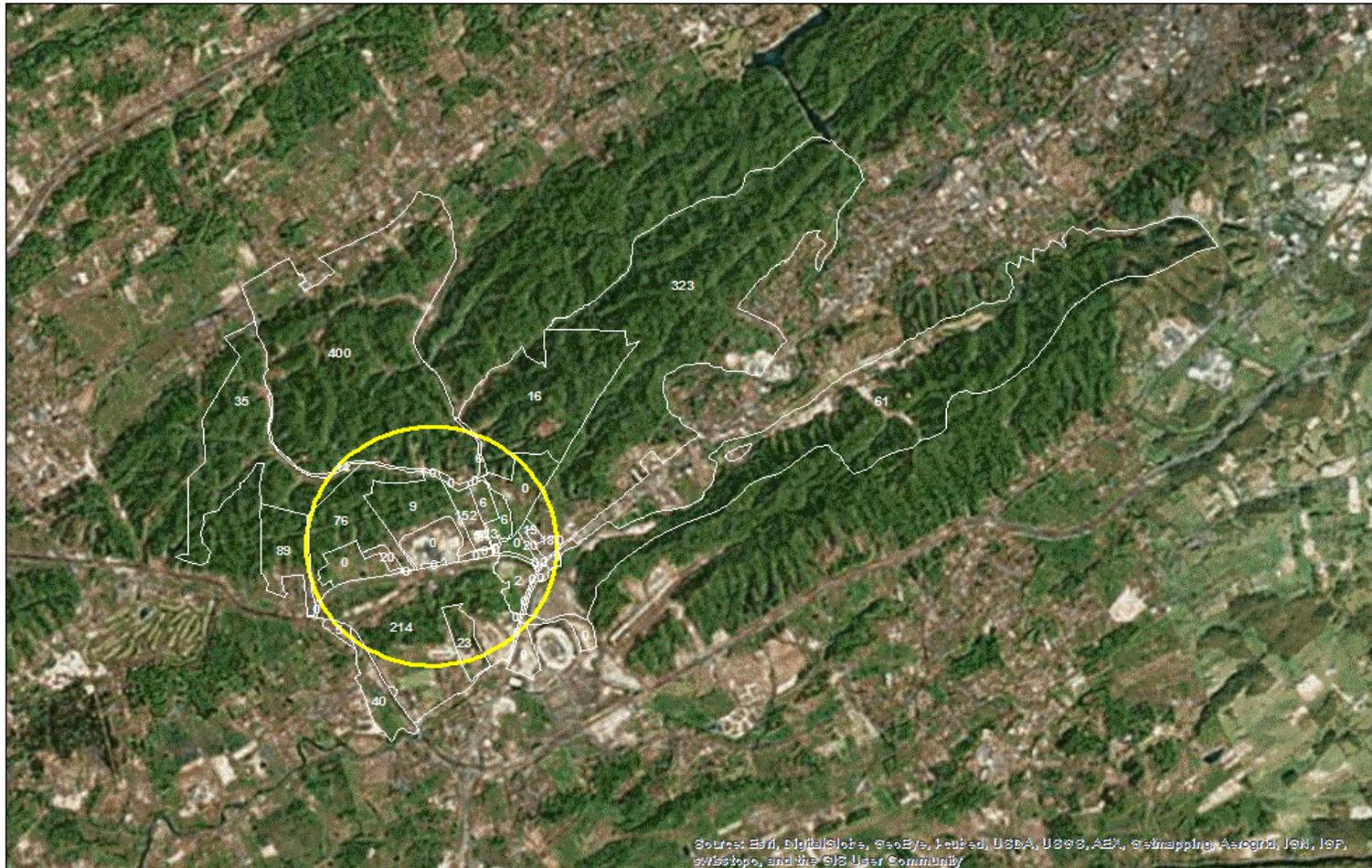
IN AND OUTSIDE OF NAA

Block Population

FID	OBJECTID	FID_Blocks	GEOID10	ALAND10	AWATER1(STFID	NAME10_STATE	COUNTY	TRACT	BLKGRP	BLOCK	TOTALPOP	WHPOP	BLPOP	OTHERPOF	HISPOP	TOTALPOP	WHPOP18	BLPOP18	OTHERPOF	HISPOP18	DISTRICT	Shape_are	Shape_len						
0	154222	205982	4.7163E+14	6179	0	4.716E+14	Sullivan	47	163	42600	1	1019	0	0	0	0	0	0	0	0	0	66515.8	2614.272						
1	154382	206142	4.7163E+14	1496145	0	4.716E+14	Sullivan	47	163	42600	2	2022	16	16	0	0	10	10	0	0	0	16105077	20425.41						
2	154586	206346	4.7163E+14	4321594	0	4.716E+14	Sullivan	47	163	43402	1	1000	400	390	0	10	5	296	290	0	6	4	0	46519395	33967.27				
3	154594	206354	4.7163E+14	28182	0	4.716E+14	Sullivan	47	163	42600	2	2034	6	6	0	0	0	3	3	0	0	0	0	303379.5	5133.624				
4	154697	206457	4.7163E+14	21267	0	4.716E+14	Sullivan	47	163	43402	1	1011	0	0	0	0	0	0	0	0	0	0	0	0	228920.5	2637.304			
5	154959	206719	4.7163E+14	9753	0	4.716E+14	Sullivan	47	163	43402	1	1013	54	49	1	4	3	50	46	1	3	3	0	104988.5	1941.067				
6	155166	206926	4.7163E+14	204585	0	4.716E+14	Sullivan	47	163	43402	1	1017	0	0	0	0	0	0	0	0	0	0	0	0	20220211	7831.766			
7	155609	207369	4.7163E+14	1848615	0	4.716E+14	Sullivan	47	163	43402	1	1037	214	213	0	1	1	181	180	0	1	1	0	19899018	27398.94				
8	155720	207480	4.7163E+14	43202	0	4.716E+14	Sullivan	47	163	43401	1	1000	5	5	0	0	0	5	5	0	0	0	0	0	465054.4	3244.291			
9	155754	207514	4.7163E+14	152536	0	4.716E+14	Sullivan	47	163	42600	2	2029	2	2	0	0	0	2	2	0	0	0	0	0	1641939	5886.217			
10	155900	207660	4.7163E+14	25700	0	4.716E+14	Sullivan	47	163	43402	1	1044	0	0	0	0	0	0	0	0	0	0	0	0	276644.2	2808.01			
11	156015	207775	4.7163E+14	52522	0	4.716E+14	Sullivan	47	163	42600	2	2020	20	20	0	0	0	18	18	0	0	0	0	0	565367.6	7068.785			
12	156091	207851	4.7163E+14	30653	0	4.716E+14	Sullivan	47	163	42600	2	2018	18	9	4	5	0	13	9	1	3	0	0	0	329961.5	2263.12			
13	156186	207946	4.7163E+14	1995	0	4.716E+14	Sullivan	47	163	42600	1	1018	0	0	0	0	0	0	0	0	0	0	0	0	0	21475.7	968.2672		
14	156188	207948	4.7163E+14	1473	0	4.716E+14	Sullivan	47	163	43000	1	1127	0	0	0	0	0	0	0	0	0	0	0	0	0	15853.75	676.3936		
15	156236	207996	4.7163E+14	5276	0	4.716E+14	Sullivan	47	163	43402	1	1040	0	0	0	0	0	0	0	0	0	0	0	0	0	56796.53	1288.741		
16	156279	208039	4.7163E+14	2935	0	4.716E+14	Sullivan	47	163	43402	1	1045	0	0	0	0	0	0	0	0	0	0	0	0	0	31595.99	1143.095		
17	156280	208040	4.7163E+14	123949	0	4.716E+14	Sullivan	47	163	43402	1	1012	152	143	2	7	5	129	122	2	5	4	0	0	0	1334232	7751.479		
18	156281	208041	4.7163E+14	73963	0	4.716E+14	Sullivan	47	163	43402	1	1043	6	6	0	0	0	6	6	0	0	0	0	0	0	796166.4	4322.169		
19	156327	208087	4.7163E+14	1730	0	4.716E+14	Sullivan	47	163	42600	2	2030	0	0	0	0	0	0	0	0	0	0	0	0	0	18626.4	882.5715		
20	156328	208088	4.7163E+14	54182	0	4.716E+14	Sullivan	47	163	42600	2	2032	0	0	0	0	0	0	0	0	0	0	0	0	0	583230.5	3887.157		
21	156329	208089	4.7163E+14	31374	0	4.716E+14	Sullivan	47	163	42600	1	1001	0	0	0	0	0	0	0	0	0	0	0	0	0	0	337718.9	3239.906	
22	156416	208176	4.7163E+14	264299	0	4.716E+14	Sullivan	47	163	43401	1	1031	40	35	3	2	2	33	30	3	0	0	0	0	0	2844978	9997.002		
23	156520	208280	4.7163E+14	8699	0	4.716E+14	Sullivan	47	163	42600	2	2033	0	0	0	0	0	0	0	0	0	0	0	0	0	0	93638.79	1837.925	
24	156536	208296	4.7163E+14	427305	0	4.716E+14	Sullivan	47	163	43402	1	1014	9	9	0	0	0	7	7	0	0	0	0	0	0	0	4599654	14455.03	
25	156855	208615	4.7163E+14	4065	0	4.716E+14	Sullivan	47	163	43000	1	1128	0	0	0	0	0	0	0	0	0	0	0	0	0	0	43755.12	1523.549	
26	156981	208741	4.7163E+14	5233	0	4.716E+14	Sullivan	47	163	42600	1	1065	0	0	0	0	0	0	0	0	0	0	0	0	0	0	56324.91	1966.783	
27	157094	208854	4.7163E+14	393492	0	4.716E+14	Sullivan	47	163	43402	1	1031	89	89	0	0	1	77	77	0	0	1	0	0	0	0	4235677	12010.85	
28	157369	209129	4.7163E+14	4521797	0	4.716E+14	Sullivan	47	163	42600	1	1000	61	56	5	0	0	46	44	2	0	0	0	0	0	0	48674379	62713.33	
29	157377	209137	4.7163E+14	289691	0	4.716E+14	Sullivan	47	163	42600	2	2021	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3118330	10598.43	
30	157380	209140	4.7163E+14	90293	0	4.716E+14	Sullivan	47	163	43402	1	1041	6	6	0	0	0	4	4	0	0	0	0	0	0	0	971938.5	6535.814	
31	157425	209185	4.7163E+14	1366519	0	4.716E+14	Sullivan	47	163	43402	1	1020	35	33	1	1	0	26	25	1	0	0	0	0	0	0	14709709	29024.28	
32	157436	209196	4.7163E+14	43116	0	4.716E+14	Sullivan	47	163	43402	1	1018	20	19	0	0	1	18	17	0	1	0	0	0	0	0	464109.5	3834.557	
33	158175	209935	4.7163E+14	18625	0	4.716E+14	Sullivan	47	163	42600	2	2019	19	17	1	1	0	18	17	1	0	0	0	0	0	0	200487.9	1836.306	
34	158176	209936	4.7163E+14	92449	0	4.716E+14	Sullivan	47	163	43000	1	1126	0	0	0	0	0	0	0	0	0	0	0	0	0	0	995151.3	6866.618	
35	158308	210068	4.7163E+14	110892	0	4.716E+14	Sullivan	47	163	43000	1	1129	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1193673	4961.867	
36	158412	210172	4.7163E+14	3710	0	4.716E+14	Sullivan	47	163	42600	1	1017	0	0	0	0	0	0	0	0	0	0	0	0	0	0	39939.38	1616.464	
37	158621	210381	4.7163E+14	6569	0	4.716E+14	Sullivan	47	163	43402	1	1036	0	0	0	0	0	0	0	0	0	0	0	0	0	0	70712.69	1828.619	
38	158717	210477	4.7163E+14	172775	0	4.716E+14	Sullivan	47	163	43402	1	1039	23	23	0	0	0	16	16	0	0	0	0	0	0	0	0	1859803	6895.727
39	158849	210609	4.7163E+14	1816	0	4.716E+14	Sullivan	47	163	42600	2	2031	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19547	892.4303
40	158857	210617	4.7163E+14	23882	0	4.716E+14	Sullivan	47	163	42600	1	1016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	257074.3	4157.494
41	158899	210659	4.7163E+14	4859147	0	4.716E+14	Sullivan	47	163	42600	2	2001	323	315	4	4	4	263	256	4	3	3	0	0	0	0	52305894	52211.51	
42	159003	210763	4.7163E+14	225278	0	4.716E+14	Sullivan	47	163	43402	1	1015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2424960	6540.266
43	159057	210817	4.7163E+14	1001	0	4.716E+14	Sullivan	47	163	43402	1	1046	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10775.7	586.4786
44	159060	210820	4.7163E+14	7920	0	4.716E+14	Sullivan	47	163	43402	1	1007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	85251.62	1665.567
45	159063	210823	4.7163E+14	1090	0	4.716E+14	Sullivan	47	163	43402	1	1042	3	3	0	0	0	3	3	0	0	0	0	0	0	0	0	11733.05	668.1186
46	159190	210950	4.7163E+14	10257	0	4.716E+14	Sullivan	47	163	43402	1	1060	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	110413	2014.129
47	159199	210959	4.7163E+14	642547	0	4.716E+14	Sullivan	47	163	43402	1	1016	76	76	0	0	0	0	0	0	0	0	0	0	0	0	0	6916592	20338.74
48	159234	210994	4.7163E+14	44227	0	4.716E+14	Sullivan	47	163	43402	1	1005	14	14	0	0	0	13	13	0	0	0	0	0	0	0	0	476078.4	10484.9
49	159506	211266	4.7163E+14	765	0	4.716E+14	Sullivan	47	163	43402	1	1019	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8238.743	859.1701

Pop %
1611 156823 1.03%

Exide Lead Nonattainment Area Population Analysis



INSIDE NA AREA ONLY

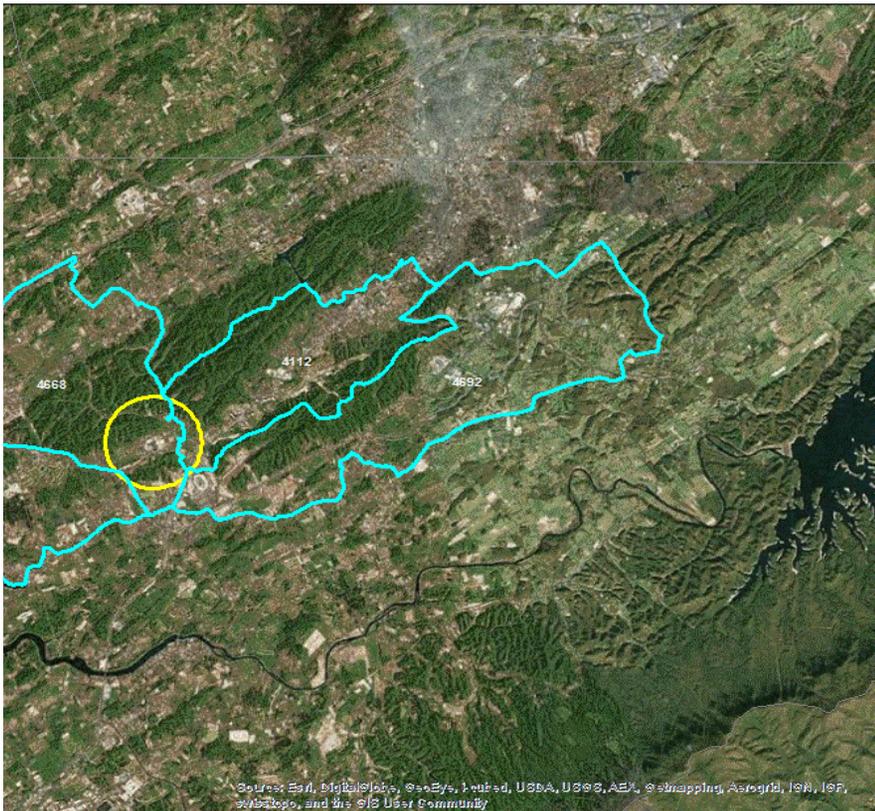
Block Population

FID	OBJECTID	FID_Blocks	GEOID10	ALAND10	AWATER10	STFID	NAME10_STATE	COUNTY	TRACT	BLKGRP	BLOCK	TOTALPOP	WHPOP	BLPOP	OTHERPOP	HISPOP	TOTALPOP	WHPOP18	BLPOP18	OTHERPOP	HISPOP18	DISTRICT	Shape_are	Shape_len	
0	154697	206457	4.72E+14	21267	0	4.72E+14	Sullivan	47	163	43402	1	1011	0	0	0	0	0	0	0	0	0	0	228920.5	2637.304	
1	154959	206719	4.72E+14	9753	0	4.72E+14	Sullivan	47	163	43402	1	1013	54	49	1	4	3	50	46	1	3	3	0	104988.5	1941.067
2	155166	206926	4.72E+14	204585	0	4.72E+14	Sullivan	47	163	43402	1	1017	0	0	0	0	0	0	0	0	0	0	0	2202211	7831.766
3	155754	207514	4.72E+14	152536	0	4.72E+14	Sullivan	47	163	42600	2	2029	2	2	0	0	0	2	2	0	0	0	0	1641939	5886.217
4	155900	207660	4.72E+14	25700	0	4.72E+14	Sullivan	47	163	43402	1	1044	0	0	0	0	0	0	0	0	0	0	0	276644.2	2808.01
5	156015	207775	4.72E+14	52522	0	4.72E+14	Sullivan	47	163	42600	2	2020	20	20	0	0	0	18	18	0	0	0	0	565367.6	7068.785
6	156186	207946	4.72E+14	1995	0	4.72E+14	Sullivan	47	163	42600	1	1018	0	0	0	0	0	0	0	0	0	0	0	21475.7	968.2672
7	156188	207948	4.72E+14	1473	0	4.72E+14	Sullivan	47	163	43000	1	1127	0	0	0	0	0	0	0	0	0	0	0	15853.75	676.3936
8	156236	207996	4.72E+14	5276	0	4.72E+14	Sullivan	47	163	43402	1	1040	0	0	0	0	0	0	0	0	0	0	0	56796.53	1288.741
9	156279	208039	4.72E+14	2935	0	4.72E+14	Sullivan	47	163	43402	1	1045	0	0	0	0	0	0	0	0	0	0	0	31595.99	1143.095
10	156280	208040	4.72E+14	123949	0	4.72E+14	Sullivan	47	163	43402	1	1012	152	143	2	7	5	129	122	2	5	4	0	1334232	7751.479
11	156281	208041	4.72E+14	73963	0	4.72E+14	Sullivan	47	163	43402	1	1043	6	6	0	0	0	6	6	0	0	0	0	796166.4	4322.169
12	156327	208087	4.72E+14	1730	0	4.72E+14	Sullivan	47	163	42600	2	2030	0	0	0	0	0	0	0	0	0	0	0	18626.4	882.5715
13	156328	208088	4.72E+14	54182	0	4.72E+14	Sullivan	47	163	42600	2	2032	0	0	0	0	0	0	0	0	0	0	0	583230.5	3887.157
14	156520	208280	4.72E+14	8699	0	4.72E+14	Sullivan	47	163	42600	2	2033	0	0	0	0	0	0	0	0	0	0	0	93638.79	1837.925
15	156536	208296	4.72E+14	427305	0	4.72E+14	Sullivan	47	163	43402	1	1014	9	9	0	0	0	7	7	0	0	0	0	4599654	14455.03
16	156981	208741	4.72E+14	5233	0	4.72E+14	Sullivan	47	163	42600	1	1065	0	0	0	0	0	0	0	0	0	0	0	56324.91	1966.783
17	157380	209140	4.72E+14	90293	0	4.72E+14	Sullivan	47	163	43402	1	1041	6	6	0	0	0	4	4	0	0	0	0	971938.5	6535.814
18	157436	209196	4.72E+14	43116	0	4.72E+14	Sullivan	47	163	43402	1	1018	20	19	0	1	0	18	17	0	1	0	0	464109.5	3834.557
19	158175	209935	4.72E+14	18625	0	4.72E+14	Sullivan	47	163	42600	2	2019	19	17	1	1	0	18	17	1	0	0	0	200487.9	1836.306
20	158412	210172	4.72E+14	3710	0	4.72E+14	Sullivan	47	163	42600	1	1017	0	0	0	0	0	0	0	0	0	0	0	39939.38	1616.464
21	158849	210609	4.72E+14	1816	0	4.72E+14	Sullivan	47	163	42600	2	2031	0	0	0	0	0	0	0	0	0	0	0	19547	892.4303
22	158857	210617	4.72E+14	23882	0	4.72E+14	Sullivan	47	163	42600	1	1016	0	0	0	0	0	0	0	0	0	0	0	257074.3	4157.494
23	159003	210763	4.72E+14	225278	0	4.72E+14	Sullivan	47	163	43402	1	1015	0	0	0	0	0	0	0	0	0	0	0	2424960	6540.266
24	159057	210817	4.72E+14	1001	0	4.72E+14	Sullivan	47	163	43402	1	1046	0	0	0	0	0	0	0	0	0	0	0	10775.7	586.4786
25	159060	210820	4.72E+14	7920	0	4.72E+14	Sullivan	47	163	43402	1	1007	0	0	0	0	0	0	0	0	0	0	0	85251.62	1665.567
26	159063	210823	4.72E+14	1090	0	4.72E+14	Sullivan	47	163	43402	1	1042	3	3	0	0	0	3	3	0	0	0	0	11733.05	668.1186
27	159190	210950	4.72E+14	10257	0	4.72E+14	Sullivan	47	163	43402	1	1060	0	0	0	0	0	0	0	0	0	0	0	110413	2014.129
28	159506	211266	4.72E+14	765	0	4.72E+14	Sullivan	47	163	43402	1	1019	0	0	0	0	0	0	0	0	0	0	0	8238.743	859.1701
												Pop %													
												291	156823	0.002											

CENSUS TRACT IN AND OUT NA AREA

NAME10	D10	MTFCC10	FUNCSTA	ALAND10	AWATER1	INTPTLAT	INTPTLON	TOTALPO	Shape_area	Shape_len	Pop %
426	Census Tra G5020	S	19047875	6119	36.54339	-82.2307	1400000U!	4112	205105148.3	83477.01	
430	Census Tra G5020	S	35015533	0	36.53985	-82.1883	1400000U!	4692	376920839	125399	
434.02	Census Tra G5020	S	25400133	0	36.53936	-82.2941	1400000U!	4668	273416818.1	79524.33	
434.01	Census Tra G5020	S	43178100	1501712	36.50701	-82.3423	1400000U!	5142	480944281	115384.6	
								18614	156823	12%	

side Lead Nonattainment Area Population Analysis



SULLIVAN COUNTY POPULATION

LSAD10	CLASSFP10	MTFCC10	ALAND10	AWATER10	INTPTLAT10	INTPTLON10	TOTALPOP	Shape.area	Shape.len
28 Z1	G4040		57142790	89179	36.5509184	-82.2090356	19899	616070190.4	189357.2
28 Z1	G4040		1.53E+08	2277420	36.5245193	-82.2864262	18932	1675817684	365825.2
28 Z1	G4040		16974239	92973	36.5825861	-82.2220568	6198	183721646.9	80068.49
28 Z1	G4040		2.21E+08	24323026	36.541502	-82.025682	6876	2644731287	338781.1
28 Z1	G4040		29962429	0	36.5605604	-82.5163546	12840	322530221.9	121571.5
28 Z1	G4040		24339250	608448	36.534021	-82.5359377	19509	268546018.5	119465.3
28 Z1	G4040		2.02E+08	7770577	36.4498263	-82.2491865	14013	2263088718	347900.9
28 Z1	G4040		1.33E+08	685183	36.5600641	-82.4215085	19754	1436801309	241782
28 Z1	G4040		79423009	4915966	36.4758857	-82.4501812	13235	907831490.4	201723.7
28 Z1	G4040		1.18E+08	494993	36.4744444	-82.5925754	12417	1273202612	189274.2
28 Z1	G4040		34935056	1072529	36.558326	-82.5834455	13150	387602731.1	149006.9

156823 Census 2010 Population
 156595 2013 Estimate

SULLIVAN COUNTY POPULATION STATS

Affected Population	County Pop. 2010	Pop %	Census Area	Census Area Affected
291	156823	0.19%	Block Population	Inside of the NA Area only
1611	156823	1.03%	Block Population	Inside and outside of the NA Area
18614	156823	11.9%	Tract Population	Census Tracts In and Outside of the NA Area

Appendix F

Exide Technologies Shutdown

Operating Permit Surrender Letter

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



82-0256

TENNESSEE
AIR POLLUTION CONTROL

2014 NOV -3 PM 12: 18

RECEIVED



Exide Technologies
364 Exide Drive
Bristol, TN 37620

(423) 989-6377 tel
423.793-5606 fax
www.exideworld.com

October 30, 2014

Mr. Steven Simpson
Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, Tennessee 37243

Re: Exide Technologies, Bristol, Tennessee
Permit Number 455099

Dear Mr. Simpson:

Exide Technologies (Exide) is in receipt of email correspondence from the Division regarding its ongoing efforts in finalizing the maintenance plan aspects of the State Implementation Plan (SIP) for the 2008 National Ambient Air Quality Standard (NAAQS) for lead in the Bristol, Sullivan County, area. Exide appreciates the activities the Division has undertaken in seeking re-designation of this area to attainment status for the lead NAAQS and looks forward to continuing to work cooperatively with the Division on these matters.

In response, by this letter, Exide is surrendering its Conditional Major Operating Permit (CMOP) number 455099 as amended June 19, 2013 effective immediately. This CMOP covered the operation of a lead-acid battery manufacturing and lead oxide production facility at our location at 364 Exide Drive in Bristol. The lead oxide and lead acid-battery production process equipment, constituting the potential sources of air emissions covered by the CMOP, have been decommissioned and largely removed from the facility at this time. Accordingly, Exide no longer needs the CMOP as permission to operate this equipment. As we have discussed, however, Exide will continue to operate a subset of the facility's baghouses and associated exhaust fans as comfort ventilation on the building. We understand that such ventilation equipment, when not serving as air pollution control equipment for regulated sources of air pollution emissions, does not require a permit from the Division to be operated. Please advise us if there are any continuing requirements for such use.



Exide Technologies
364 Exide Drive
Bristol, TN 37620

(423) 989-6377 tel
423.793-5606 fax
www.exideworld.com

It is our understanding that this surrender of our CMOP will be useful to the Division as an element of the maintenance plan SIP now under development. We also thank you for the commitment to support us if a change in our business plans requires us to resume all or part of our operations at Bristol.

Please feel free to contact me at (423) 989-6377 with any questions you may have regarding this permit surrender correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph A. Bolea". The signature is fluid and cursive, with a large initial "J" and "B".

Joseph A. Bolea
Director EHS Americas Operations
Exide Technologies

Cc:

John Trimmer, TDEC Nashville Office
Lacey Hardin, TDEC Nashville Office
Haidar Alrawi, TDEC Nashville Office
Vera Davis, TDEC Johnson City Field Office
Tom STRANG, Exide technologies
Bruce Cole, Exide Technologies
Christine GRAESSLE, Exide Technologies
Jerry Moore, Exide Technologies
Fred Ganster, Exide Technologies
John Bidleman, Exide Technologies

Appendix G

Public Participation Documentation

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
15th Floor, William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243



Public Hearing Notice

Malcolm Butler

Sent: Friday, April 10, 2015 2:16 PM
To: egoodman@tnpress.com
Cc: Lacey Hardin; Paul LaRock; Haidar Alrawi
Attachments: Sullivan County Pb REDESIG-1.doc (41 KB)

DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

April 10, 2015

Mr. Earl Goodman
Tennessee Press Service Inc.
6915 Office Park Circle
Knoxville, Tennessee 37909

Dear Mr. Goodman:

Please run the enclosed public notice one time in the following newspapers:

1. The Bristol Herald Courier – Bristol
2. The Kingsport Times – News - Kingsport

Place this notice in their next edition on or before April 18, 2015.

This notice is announcing a public hearing on May 21, 2015, called under the authority of the Tennessee Air Pollution Control Board to receive comments on the proposed Sullivan County Redesignation Request and Maintenance Plan for the Bristol Lead (Pb) Partial Nonattainment Area pursuant to Tennessee Code Annotated, Section 68-201-105.

Please publish this notice in the most economical manner. Send a copy of the ad and your invoice listing the charges from each newspaper in triplicate with three tear sheets of this ad to me for prompt payment.

Please provide best cost estimate and expected publication dates to Malcolm Butler as soon as possible. If you have any questions or need further assistance contact Malcolm Butler at (615) 532-0600, fax (615) 532-0614.

Sincerely,

Malcolm

Malcolm H. Butler
Environmental Protection Specialist
Regulatory Development and Special Projects Program
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

Phone: (615)532-0600
Fax: (615)532-0614
Email: malcolm.butler@tn.gov

Enclosure

C:\ln 2015.doc

NOTICE
OF PUBLIC HEARING
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

STATE IMPLEMENTATION PLANS
Sullivan County Redesignation Request and Maintenance Plan for the Bristol Lead (Pb) Partial
Nonattainment Area

There will be a public hearing before the Technical Secretary of the Tennessee Air Pollution Control Board to consider the thirty (30) day public notice addressing Section 172(c), as amended of the Clean Air Act (CAA) requirements for states developing a federally enforceable State Implementation Plan (SIP) for Lead (Pb) Nonattainment Area (NAA). The SIP documents how an area will attain the National Ambient Air Quality Standards (NAAQS) and generally contains four elements: emission inventory, clean data determination or modeled attainment demonstration, Reasonably Available Control Technology/Reasonably Available Control Measures (RACT/RACM) analysis, and adoption of controls.

This proceeding satisfies the redesignation to attainment based upon clean data determination (i.e., air quality monitoring) and maintenance plan submittal requirement.

The Tennessee NAA for the Lead (Pb) NAAQS consists of an area within Sullivan County with a radius of one and a quarter (1.25) kilometers (0.78 mile) from the Exide Technologies (or Exide) Lead Company. From the period January 2007 to January 2008, air quality monitoring data at the Exide's Lead site indicated that the rolling 3-month average Pb concentrations exceeded the 0.15 $\mu\text{g}/\text{m}^3$ NAAQS. The Environmental Protection Agency (EPA) designated the area as nonattainment for the Pb NAAQS, effective December 31, 2010. More recently, air quality data for 2011 through 2013 indicates declining lead concentrations in the Sullivan County area and the design value (DV) at the controlling monitor shows attainment of the NAAQS.

This proceeding documentation constitutes the Tennessee redesignation request to attainment based upon the 2011-2013 DV and the 2010 base year (BY) and 2022 future year (FY) maintenance plan for the Bristol partial Pb NAA.

The hearing will be conducted in the manner prescribed by the Uniform Administrative Procedures Act, Tennessee Code Annotated, Section 4-5-201 et. seq. and will take place in the Sullivan County Courthouse located at 3411 Highway 126, Blountville, TN 37617, at 4:00 p.m. on Thursday, May 21, 2015. Anyone desiring to make oral comments at this public hearing is requested to prepare a written copy of their comments to be submitted to the hearing officer at the public hearing.

Written comments not submitted at the public hearing will be included in the hearing record only if received by the close of business on Thursday, May 21, 2015, at the following address: Technical Secretary, Tennessee Air Pollution Control Board, 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, TN 37243.

Individuals with disabilities who wish to participate in these proceedings or to review these filings should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such initial contact may be in person, by writing, telephone, or other means, and should be made no less than ten (10) days prior to Thursday, May 21, 2015, or the date such party intends to review such filings, to allow time to provide such aid or service. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, 2nd Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville TN 37243, 1-866-253-5827 (toll free) or (615) 532-0200. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If you have any questions about the SIP Lead documentation(s), you may contact Mr. Haidar Al-Rawi, P.E. at (615) 532-0578. Copies of document(s) concerning this matter are available for review at the office of the Technical Secretary and at certain public depositories. For information about reviewing these documents, please contact Mr. Haidar Al-Rawi, P.E., 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, TN 37243, telephone (615) 532-0578.

Materials concerning the proposed action will be available at <http://tn.gov/environment/ppo/#air> under the heading of

“Sullivan County Lead (Pb) Redesignation to Attainment.”

and also for public inspection during normal working hours starting on Thursday, April 16, 2015, at the following locations:

Air Pollution Control Division
15th Floor, William R. Snodgrass TN Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

Air Pollution Control Division
Johnson City EFO
2305 Silverdale Road
Johnson City, TN 37601-2162

Kingsport Public Library
400 Broad Street
Kingsport, TN 37660

U.S. EPA, Region IV
APTMD - 12th Floor
Atlanta Federal Center
61 Forsyth Street S.W.
Atlanta, Georgia 30303
c/o Mr. Scott R. Davis, Chief (SIP)

All persons interested in the air quality of the State of Tennessee are urged to attend and will be afforded the opportunity to present testimony to the hearing officer regarding the proposed re-designation and maintenance plan. Any person desiring to present lengthy comments should be prepared at the hearing to offer a written statement to be incorporated into the record. Written statements not presented at the hearing will only be considered part of the record if received by 4:30 p.m. CDT on Thursday, May 21, 2015, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 15th Floor, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243.

Sullivan County Pb REDESIGNATION and MP Public Hearing Notice_04102015.doc