



REGION 4

ATLANTA, GA 30303

October 10, 2025

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

Dear Ms. Owenby:

Thank you for submitting the state of Tennessee's 2025 Annual Ambient Air Monitoring Network Plan (Network Plan), which was received on June 20, 2025. The Network Plan is required by 40 Code of Federal Regulations (CFR) §58.10. The Network Plan is an essential part of implementing sections of the Clean Air Act, specifically the provisions in parts 103, 110 and 319.

The Environmental Protection Agency Region 4 acknowledges that the Tennessee Department of Environment and Conservation (TDEC) provided the public an inspection and comment period for the draft Network Plan from May 16 through June 15, 2025, and a public hearing was held on June 17, 2025, with comments accepted through June 18, 2025. The only comment received was from the EPA. The final Network Plan submitted by the TDEC included the public comment by the EPA and the response provided by the State.

The Network Plan meets the minimum requirements of 40 CFR Part 58. The EPA approves the 2025 Tennessee Network Plan. The Network Plan proposes to relocate the Cookeville special purpose monitor (SPM) particulate matter less than 2.5 microns (PM_{2.5}) site due to loss of access to the property. The EPA will work with the State on this relocation and ensuring the appropriate documentation is provided and that all applicable siting requirements of 40 CFR Part 58, Appendix E, are met. Please see section C.1 in the enclosed technical support document (TSD) for more information. This update to the state ambient air monitoring network must be included in the network plan due by July 1, 2026.

The two-year evaluation period for one Teledyne T640 and two Teledyne PM_{2.5} federal equivalent method (FEM) monitors have either expired or are expiring soon in the Chattanooga (Teledyne API T640), Memphis (Teledyne API T640x), and Nashville (Teledyne API T640x) local air programs. The EPA

will coordinate with the State and the respective local agencies to evaluate the PM_{2.5} comparability assessments for these FEMs and determine a path forward for those data. Please see the discussion in section C.1 of the enclosed TSD for more information. These updates must be included in the ambient air monitoring network plans due by July 1, 2026, for each agency.

The 5-year Network Assessments were also received from the state and the four local agencies and satisfies the submission requirement of 40 CFR Part 58.10(d). Detailed comments on the Network Plan are enclosed. Thank you for working with the EPA Region 4 to monitor air pollution and promote clean air in Tennessee. If you have any questions or concerns, please contact Katy R. Lusky at (404) 562-9130, Erin Frew at (404) 562-9370, or Darren Palmer at (404) 562-9052.

Sincerely,

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DIAZ

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Denisse D. Diaz
Director
Air and Radiation Division

Enclosure:

1. U.S. EPA Region 4 – Tennessee Ambient Air Monitoring Network Plan Review

cc: Mr. Justin Mayer, Director
Knox County Department of Air Quality Management

Ms. Karen Cook-Pryor, Deputy Administrator
Shelby County Health Department, Environmental Health Services

Mr. Ron Drumeller, Director
Chattanooga-Hamilton County Air Pollution Control Bureau

Mr. John Finke, Director
Nashville-Davidson County Metro Public Health Department, Pollution Control Division

U.S. EPA Region 4 – Tennessee Ambient Air Monitoring Network Plan Review

This enclosure documents the EPA Region 4 review of the Ambient Air Monitoring Network Plan for the Tennessee Department of Environment and Conservation (TDEC) and its four local agency air programs. Ambient air monitoring rules, which include regulatory requirements that address network plans, data certification, and minimum monitoring requirements, among other requirements, are found in 40 Code of Federal Regulations (CFR) Part 58. Minimum monitoring requirements for criteria pollutants are listed in 40 CFR Part 58, Appendix D. These requirements are specified for ozone (O₃), particulate matter less than 2.5 microns (PM_{2.5}), particulate matter less than 10 microns (PM₁₀), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), and lead (Pb).

The local agency monitoring programs included in the Network Plan are operated by the Chattanooga-Hamilton County Air Pollution Control Bureau (Chattanooga), the Nashville-Davidson County Metro Public Health Department (Nashville), the Knox County Department of Air Quality Management (Knoxville or KCDAQM), and the Shelby County Health Department (Memphis or SCHD).

A. Proposed Changes and the EPA Comments 40 CFR §58.10(b), §58.14

The EPA has approval authority for changes to state or local air monitoring stations (SLAMS). SLAMS include the ambient air quality monitoring sites and monitors that are required by Appendix D of 40 CFR Part 58 and are needed to meet the monitoring objectives of Appendix D, including comparisons to the national ambient air quality standards (NAAQS), but may also serve other data purposes. The EPA is not required to approve changes made to special purpose monitors (SPMs). SPMs are monitors designated by the monitoring agency as special purpose and do not count towards meeting minimum monitoring requirements of 40 CFR Part 58. SPMs are required to be identified in the Network Plan for the public and the EPA review.

Monitors proposed for discontinuation, start-up, reconfiguration, or relocation and the EPA's decision and rationale for approval/disapproval/acknowledgement of each proposed change are summarized in Table A-1. For any relocated monitors, unless noted below, the EPA approves the use of a combined dataset between the existing and proposed sites for the purpose of calculating air quality design values. The detailed rationale for approval/disapproval of each proposed change is contained in the following pollutant-specific sections.

Table A-1: Proposed Changes in Monitoring Network

Core-based Statistical Area (CBSA)	AQS ID and Site Name	Pollutant	Type	Comments
Cookeville, TN micropolitan statistical area	47-141-0005 (Cookeville)	PM _{2.5}	SPM	The State will have to relocate the site due to the sale of the property. The EPA will work with TDEC to ensure the appropriate documentation is provided.

B. Public Comments
40 CFR § 58.10 (a)(1)

The requirement for a public comment period and response from the Agency in the final Network Plan is found in 40 CFR § 58.10 (a)(1):

“The annual monitoring network plan must be made available for public inspection and comment for at least 30 days prior to submission to the EPA and the submitted plan shall also include and address, as appropriate, any received comments.”

The public comment period for the Network Plan was held from May 16 through June 15, 2025. The only public comments received were from the EPA Region 4, and the State provided an adequate response to the comments in Attachment B on pages 117-118 in the final Network Plan. The comments and responses are summarized in Table B-1.

Table B-1: Public Comments and Responses (40 CFR § 58.10 (a)(1))

Summary of Public Comment	Agency Response	The EPA Comments
Pursuant to 40 CFR 51.1205(b), the EPA requests TDEC’s final Data Requirements Rule (DRR) report includes a statement that explains why TVA Cumberland’s SO ₂ emissions increased 525 tons from 2023 to 2024.	The Tennessee Valley Authority’s (TVA’s) emissions increased by 525 tons from 2023 to 2024 was due to the increased coal utilization generally related to unit availability, fuel pricing and growth demand especially for the mid-state region as the proposed gas-fired Combustion Turbines Simple Cycle Cheatham County Generation Facility (CHG) has not been constructed or operated yet. The basis for the increase in SO ₂ emissions is provided by TVA.	The EPA acknowledges TDEC’s response concerning emission increase at TVA and will continue to monitor emissions trends for future reporting.
With the termination of annual emissions reporting for TVA Allen and Johnsonville, TDEC is no longer required to include these sources in future DRR reports. At TDEC’s discretion, the EPA recommends the state remove the source summary and data for these facilities from future DRR reporting and instead provide a statement about the termination.	TDEC APC concurs with the comment and future annual reports will include a statement indicating the exemption of TVA-Allen and TVA-Johnsonville from the annual reporting requirement based on the 2019-2021 exempt modeling demonstrations for both plants.	The EPA agrees with TDEC’s response.

The submitted Network Plan meets the public comment requirements of 40 CFR § 58.10.

C. Regulatory Requirements

40 CFR § 58.10(a)(1) requires that each Network Plan shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include Federal Reference Method (FRM) and Federal Equivalent Method (FEM) monitors that are part of SLAMS, National Core Monitoring Sites (NCore), Chemical Speciation Network (CSN), Photochemical Assessment Monitoring System (PAMS), and SPM stations.

40 CFR § 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the Network Plan is based on the requirements listed in 40 CFR § 58.10 along with those in Appendices A, C, D, and E.

Table C-1: Monitoring Network Plan Checklist

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Yes	Yes	Submitted on June 20, 2025.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Yes. The State submitted separate documents for the comment period and the public hearing.	Yes	Public comment period held May 16 – June 15, 2025. Public Hearing held on June 17, 2025.
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable.	58.10 (a)(1)	Chattanooga – No, Page 27 Knoxville – No, Page 4 Memphis – Yes, Page 6, 48 Nashville – No, Page 4 TDEC – Yes, Page 7, 11	Yes	While each agency acknowledges this requirement in their plan, not every agency includes this explicit statement that all their monitors meet it. However, each agency may have otherwise documented in their respective plans that their networks meet these requirements as applicable. The

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, or Incomplete.

³ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
					region will work with the state and local agencies to make sure this explicit statement is included in the annual network plan due by July 1, 2026.
4.	Modifications to SLAMS Network	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A TDEC – N/A	Yes	No SLAMS modifications proposed.
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since the last Network Plan approval?	N/A	Chattanooga – N/A Knoxville – Section 4. Memphis – N/A Nashville – N/A TDEC – N/A	Yes	In the EPA’s response to the network plan submitted in 2024, the second Pb monitoring site at Parton Place near Ameristeel was approved for shutdown and the local agency discontinued the site in February 2025. The primary Pb monitoring site remains operational.
6.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal.	58.10 (b)(5)	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A TDEC – Page 9, Cookeville SPM PM _{2.5} site.	Yes	TDEC is proposing to relocate Cookeville SPM PM _{2.5} site due to property being sold. The EPA will work with the state to submit the required documentation.
7.	Statement that SPMs operating an FRM/FEM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁴	58.11 (a)(2)	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A TDEC – pages 24-34	Yes	No explicit statement, but the information included in the State’s plan for the sites in Maryville, Athens, Columbia, Cookeville, and Harriman indicate the data are regulatory.

⁴ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
8.	SPMs operating FRM/FEM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁵	58.20(c)	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A TDEC – pages 24-34	Yes	NAAQS exclusions for three PM _{2.5} FEM monitors are expiring. The EPA will work with the State and the respective local agencies to evaluate the comparability assessments and determine a path forward for those data. These updates must be included in the network plans due by July 1, 2026.
9.	For agencies that share monitoring responsibilities in a Metropolitan Statistical Area (MSA)/Combined Statistical Area: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place.	App. D 2(e)	Chattanooga – No Knoxville – N/A Memphis – Section VII Nashville – N/A TDEC – Appendix A	Yes	While the EPA recognizes the existence of the Memorandum of Agreement (MOA) between the State of Georgia and the Chattanooga-Hamilton County local agency to share the ambient air monitoring responsibilities for the Chattanooga, TN-GA MSA, it was not included in the local agency's plan. We will work with the local agency to ensure this MOA is included in future network plans. The Knox County and Nashville-Davidson County local agencies meet all the requirements independently of the State.
PM_{2.5} SPECIFIC MONITORING REQUIREMENTS					
10.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10(c)	Yes. The State submitted separate documents for the comment period and the public hearing.	Yes	The State posts all the network plans for a 30-day comment period and holds a public meeting after the comment period is over.

⁵ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
11.	Identification of any PM _{2.5} FEMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with NAAQS-comparable monitor at the required sample frequency.]	58.10(b)(13) 58.11(e)	Chattanooga - Yes Knoxville – N/A Memphis – Section VI(A) Nashville – Pages 4 and 11 TDEC – N/A	Yes	NAAQS exclusions for three PM _{2.5} FEM monitors are expiring. The EPA will work the State and the respective local agencies to evaluate the comparability assessments and determine a path forward for those data. These updates must be included in the network plans due by July 1, 2026.
12.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMS are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Chattanooga – Pages 12-14 of the State’s plan. Knoxville – Section 2 Memphis – Section II Nashville – Pages 12-14 of the State’s plan. TDEC – Pages 12-14	Yes	
13.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App. D 4.7.2	Chattanooga – Pages 12-14 of the State’s plan. Knoxville – Section 2 Memphis – Section II Nashville – Pages 12-14 of the State’s plan. TDEC – Pages 12-14	Yes	
14.	FRM/FEM PM _{2.5} QA collocation	App. A 3.2.3	Chattanooga – Pages 12-13 of the State’s plan. Knoxville – Section 2 Memphis – Section IV Nashville – Pages 12-13 of the State’s plan. TDEC – Pages 12-13	Yes	
15.	PM _{2.5} Chemical Speciation requirements for official STN sites	App. D 4.7.4	Chattanooga – Pages 18-19 of the State’s plan.	Yes	

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			Knoxville – Section 2 Memphis – Section IV Nashville – Pages 18-19 of the State’s plan. TDEC – Pages 18-19		
16.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10(b)(7)	Chattanooga – No Knoxville – No explicit statement, but other information provided includes the data are regulatory. Memphis – Page 48, 58 Nashville – Pages 4, 11 TDEC – Pages 22-50	Yes	NAAQS exclusions for three PM _{2.5} FEM monitors are expiring. The EPA will work with the State and the respective local agencies to evaluate the comparability assessments and determine a path forward for those data. These updates must be included in the network plans due by July 1, 2026.
17.	Required PM _{2.5} sites represent area-wide air quality	App. D 4.7.1(b)	Chattanooga – Page 31 Knoxville – Sections 2.7, 3.1, 3.4, and 3.5 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	The majority of PM _{2.5} sites are sited to represent population exposure and area-wide air quality.
18.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Chattanooga – No Knoxville - No Memphis – Section IV(D) Nashville - No TDEC – Pages 22-50	Yes	Not every agency explicitly identified one of their sites as a maximum concentration site in their plan. The EPA will work with each agency to identify which of the existing sites may meet this objective. This change will be updated in the network plan due by July 1, 2026.
19.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A	Yes	No additional PM _{2.5} sites required at this time.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			TDEC – N/A		
20.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App. D 4.7.3	TDEC – Page 14	Yes	
21.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules	58.10(b)(4); 58.12(d); App. D 4.7	Chattanooga – Table 9 Knoxville – Section 3 Memphis – Sections IV and VI Nashville – Section 3 TDEC – Page 22-50	Yes	
PM₁₀ SPECIFIC MONITORING REQUIREMENTS					
22.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMS are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6(a) and Table D-4	Chattanooga – N/A Knoxville – Section 2 Memphis – Section II Nashville – Section 2.2 TDEC – Page 14	Yes	
23.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App. A 3.3.4	N/A	Yes	All PM ₁₀ methods in the state are continuous methods.
24.	Sampling schedule for PM ₁₀	58.10(b)(4); 58.12(e); App. D 4.6	Chattanooga – N/A Knoxville – Section 2 Memphis – Sections IV and VI Nashville – Section 3.3 TDEC – Pages 22-50	Yes	
Pb SPECIFIC MONITORING REQUIREMENTS					
25.	Minimum # of monitors for Pb [Note: Only monitors considered to be required SLAMS are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.5	Chattanooga – N/A Knoxville – Section 2 Memphis – Section II Nashville – N/A TDEC – Page 17	Yes	Pb monitoring not required in Chattanooga, Memphis, or Nashville CBSAs. No sources identified that meet the threshold requirements for source-oriented monitoring.
26.	Pb collocation	App. A 3.4.4 and 3.4.5	Chattanooga – N/A Knoxville – Section 2 Memphis – N/A Nashville – N/A TDEC – Page 200	Yes	See above.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
27.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10(b)(10)	Chattanooga – N/A Knoxville – N/A Memphis – N/A Nashville – N/A TDEC – Page 20	Yes	Siting criteria waiver requested for the Exide Pb monitoring site in Sullivan County. While the site does not maintain a continuous 270-degree arc free of obstructions, there are no obstructions between the source the sample inlet. Approved.
28.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10(b)(11)	N/A	Yes	No waivers requested for this.
29.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10(b)(9)	Yes	Yes	All Pb monitors are source-oriented.
30.	Sampling schedule for Pb	58.10(b)(4); 58.12(b); App. A 3.4.4.2 (c) and 3.4.5.3 (c)	Chattanooga – N/A Knoxville – Section 3.2 Memphis – N/A Nashville – N/A TDEC – Page 20	Yes	Pb monitoring not required within the jurisdictions of the local agencies in Chattanooga, Memphis, or Nashville.
O₃ SPECIFIC MONITORING REQUIREMENTS					
31.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMS are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App. D 4.1(a) and Table D-2	Chattanooga – Pages 14-15 in the State’s plan. Knoxville – Section 2 Memphis – Section II Nashville – Pages 14-15 in the State’s plan. TDEC – Pages 14-15	Yes	Even if a local agency did not include this specific information in their local agency plan, the State includes the federal minimum requirements for all areas on pages 14-15 of their plan.
32.	Identification of maximum concentration O ₃ site(s)	App. D 4.1(b)	Chattanooga - No Knoxville – Page 21 Memphis - No Nashville – Page 10 TDEC – Pages 22-50	Yes	Not every agency included this designation in their plan. We will work with each agency to ensure this is updated in the network plan due July 1, 2026.
33.	Sampling season for O ₃	58.10(b)(4); App. D 4.1(i)	Chattanooga – No Knoxville – Page 9 Memphis – Section IV	Yes	Even though an agency may not have included the specific sampling season for O ₃ in their

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			Nashville - No TDEC – Pages 22-45		plan, sampling seasons are defined in Table D-3 of Appendix D to 40 CFR Part 58. All agencies are meeting the 1-hr sampling frequency as well as monitoring during the defined ozone season.
34.	An Enhanced Monitoring Plan for O ₃ , if applicable, no later than October 1, 2019, or two years following the effective date of a designation to a classification of Moderate or above O ₃ nonattainment, whichever is later.	58.10(a)(11); App. D 5(h)	N/A	Yes	This is not required for any areas in Tennessee at this time.
NO₂ SPECIFIC MONITORING REQUIREMENTS					
35.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale	App. D 4.3.3	Chattanooga – N/A Knoxville – Section 2 Memphis – Section VII Nashville – Page 8 TDEC – Page 16	Yes	This only applies to Memphis and Nashville CBSAs due to the population thresholds.
36.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂	App. D 4.3.4	N/A	Yes	None have been identified by the EPA to meet this requirement.
37.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10(b)(12)	Chattanooga – N/A Knoxville – Section 2 Memphis – Section IV(D) Nashville – Page 8, 14 TDEC – Pages 16-18	Yes	Near-road monitoring is only currently required in the Memphis and Nashville CBSAs in the State.
NEAR ROADWAY SPECIFIC MONITORING REQUIREMENTS					
38.	NO ₂ near- road monitors (See table D-7 for calculated minimums by CBSA)	App. D 4.3.2(a); 58.13(c)(3) and (4)	Chattanooga – N/A Knoxville – Section 2 Memphis – Section IV(D) Nashville – Page 14 TDEC – Pages 16-18	Yes	Near-road monitoring is only currently required in the Memphis and Nashville CBSAs in the state.
39.	CO near-road monitors	App. D 4.2.1(a); 58.13(e)(2)	Chattanooga – N/A Knoxville – Section 2	Yes	See above.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			Memphis – Section IV(D) Nashville – Page 14 TDEC – Page 15		
40.	PM _{2.5} near-road monitors	App. D 4.7.1(b)(2); 58.13(f)(2)	Chattanooga – N/A Knoxville – Section 2 Memphis – Section IV(D) Nashville – Page 14 TDEC – Pages 16-18	Yes	See above.
SO₂ SPECIFIC MONITORING REQUIREMENTS					
41.	Minimum monitoring requirements for SO ₂ based on population weighted emissions index (PWEI) and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMS are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.4	Chattanooga – N/A Knoxville – Section 2 Memphis – N/A Nashville – Page 14 TDEC – Pages 16-17, 93-94	Yes	No areas in the State are explicitly required to have a PWEI SO ₂ monitor. However, TDEC operates one in Sullivan County. Both the Nashville-Davidson County local and the SCHD operate one SO ₂ monitor each.
42.	Monitors used to meet Data Requirements Rule (DRR).	51.1203(c)	Chattanooga – N/A Knoxville – Section 2 Memphis – N/A Nashville – N/A TDEC – Pages 16-17, 105-118	Yes	The State identified these monitors in its network plan.
NCORE SPECIFIC MONITORING REQUIREMENTS					
43.	NCore site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10 meters, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable.	App. D 3(b)	Chattanooga – N/A Knoxville – N/A Memphis – Section IV(C) Nashville – N/A TDEC – Page 17	Yes	The State has a required urban NCore site in Memphis operated by the SCHD and a rural NCore site at Look Rock operated by the National Parks Service.
44.	PAMS site and all required parameters operational.	58.10(a)(10); 58.13(h)	Chattanooga – N/A Knoxville – N/A Memphis – Page 25 Nashville – N/A	No	The AutoGC measurements were not implemented during the 2025 PAMS season. The EPA Region 4 is aware of the

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			TDEC – Page 19		budgetary restraints in implementing PAMS. This is a complicated and expensive monitoring effort for the local agency to fully implement each year, and the region continues to work with the SCHD to implement PAMS each year.
SITE OR MONITOR - SPECIFIC REQUIREMENTS					
45.	AQS site identification number for each site	58.10(b)(1)	Chattanooga – page 28 Knoxville – Page 8 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
46.	Location of each site: street address and geographic coordinates	58.10(b)(2)	Chattanooga – pages 29-31 Knoxville – Page 8 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
47.	MSA, CBSA, CSA or other area represented by the monitor	58.10(b)(8)	Chattanooga – pages 29-31 Knoxville – Pages 7-8 Memphis – Section I Nashville – Section 1 TDEC – Pages 22-50	Yes	
48.	Basic monitoring objective for each monitor	App. D 1.1; 58.10(b)(6)	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
49.	Site type for each monitor	App. D 1.1.1	Chattanooga – pages 29-31	Yes	

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50		
50.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
51.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App. D	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
52.	Method description (e.g., manufacturer & model) for each monitor	58.10(b)(3); App. C 2.4.1.2	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
RECOMMENDED SITE OR MONITOR SPECIFIC INFORMATION (Appendix E information required for new sites)					
53.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
54.	Parameter code for each monitor	Needed to determine if other	Chattanooga – pages 29-31	Yes	

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
		requirements (e.g., min # and collocation) are met	Knoxville – pages 15-28 Memphis – Page 4 Nashville – Section 3 TDEC – Pages 22-50		
55.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Chattanooga – pages 29-31 Knoxville – pages 15-28 Memphis – Section IV Nashville – Section 3 TDEC – Pages 22-50	Yes	
56.	Distance of monitor from nearest road	App. E 2.5, Table E-1	Chattanooga – pages 20-22 Knoxville – Section 3 Memphis - No Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
57.	Traffic count of nearest road	App. E 2.5, Table E-1	Chattanooga – pages 18-19 Knoxville – No Memphis – No Nashville – No TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
58.	Groundcover	App. E 2.2	Chattanooga – pictures of each site were included. Knoxville - pictures of each site were included. Memphis – Section IV	Yes	While the type of groundcover may have not been explicitly stated in an agency's plan, pictures of all the sites have been included by each agency, and the groundcover is clearly visible. The Region will work with the State and local

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			Nashville - pictures of each site were included. TDEC – Site Evaluations document, pages 1-480		agencies to ensure that these requirements are being met.
59.	Probe height	App. E 2.1	Chattanooga – pages 29-31 Knoxville – Section 3 Memphis – Section IV Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
60.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App. E 2.1 and Table E-6	Chattanooga – did not provide Knoxville – Section 3 Memphis – Section IV Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
61.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App. E Table E-6	Chattanooga- did not provide Knoxville – Section 3 Memphis – Section IV Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
62.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App. E Table E-6	Chattanooga – did not provide Knoxville – Section 3 Memphis – Section IV Nashville – Section 4	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.

	Network Plan Requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, list section or page #s.	Requirement Met ³	Notes
			TDEC – Site Evaluations document, pages 1-480		
63.	Distance from the drip line of closest tree(s)	App. E 3.4(a)	Chattanooga – did not provide Knoxville – Section 3 Memphis – Section IV Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.
64.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App. E 3.3(b)	Chattanooga – did not provide. Knoxville – Section 3 Memphis – Section IV Nashville – Section 4 TDEC – Site Evaluations document, pages 1-480	Yes	Recommended, but not required for the Network Plan. The Region will work with the state and local agencies to ensure that these requirements are being met.

C.1 Additional Discussion

The EPA appreciates the efforts by the state and local agencies to continue modernizing their networks by upgrading monitoring equipment, shelters, and networking infrastructure.

In the State’s plan, on page 12, where the required number of monitors for PM_{2.5} is listed, the EPA has determined that the required minimum number stated is not correctly listed for most of the MSAs. Most MSAs should be required to have one more PM_{2.5} monitoring site than what is stated. Currently, the PM_{2.5} annual NAAQS is 9.0 micrograms per cubic meter (µg/m³). In the plan due by July 1, 2026, the State should reassess the minimally required number of monitors based on the most current data and update both tables for PM_{2.5}. While there is not an actual deficiency in the network itself where additional monitoring sites are needed, this is merely an administrative change that should be made to ensure the most accurate information is available to the public.

For the network plans due by July 1, 2026, the State should work with each local agency to ensure that maximum concentration sites for O₃ and PM_{2.5} are identified in each MSA where minimum monitoring requirements apply as listed in items 18 and 32 in Table C-1 above. Some agencies may have identified both, or one for one pollutant and not the other, or none at all. The Region will work with the state and/or local agencies to make these determinations.

The two-year evaluation period for one Teledyne API T640 and two Teledyne API T640x PM_{2.5} FEM monitors have either expired or are expiring soon in the Chattanooga-Hamilton County (T640), Memphis-Shelby County (T640x), and Nashville-Davidson County (T640x) local air programs. Once each agency has entered all the data through the expiration period, the EPA will work with the state and the respective local agencies to evaluate the PM_{2.5} comparability assessments for these FEMs and determine a path forward for those data. More information is available in Table D-11 below. These updates must be included in the network plans for these agencies and are due by July 1, 2026.

The State is proposing to relocate the Cookeville SPM PM_{2.5} site. Since this is an SPM site, no network plan addendum is required to be submitted outside of the network plan process. The EPA will work with TDEC to ensure that appropriate documentation is provided, and the new location meets all the requirements of 40 CFR Part 58 Appendix E. This information should be included in the network plan due by July 1, 2026.

D. Monitoring Network Details

The following tables compare the monitors listed in the Network Plan to the pollutant-specific network design requirements found in 40 CFR Part 58, Appendix D.

Table D-1: July 1, 2024, Population Estimates from U.S. Census Bureau and AQI Reporting by Core Based Statistical Area (40 CFR §58.50)

CBSA	Population	AQI Requirement Met? (Y/N) ⁶
Nashville-Davidson-Murfreesboro-Franklin, TN	2,150,553	Y
Memphis, TN-MS-AR	1,339,345	Y

⁶ AQI reporting is required in MSAs with populations over 350,000

CBSA	Population	AQI Requirement Met? (Y/N) ⁶
Knoxville, TN	957,608	Y
Chattanooga, TN-GA	588,050	Y
Clarksville, TN-KY	345,955	Y*
Kingsport-Bristol, TN-VA	313,876	Y*
Johnson City, TN	214,948	Y*
Jackson, TN	183,680	N/A
Cleveland, TN	132,120	N/A
Morristown, TN	126,932	N/A

* TDEC voluntarily reports AQI values for these three areas.

Table D-2: NCore Monitoring Sites (40 CFR Part 58, Appendix D, Section 3.0)

CBSA	AQS ID	Site Name	Requirement Met? (Y/N)
Memphis, TN-MS-AR	47-157-0075	Shelby Farms	Y
Knoxville, TN ¹	47-009-0101	Look Rock	Y

¹Rural NCore site operated by the National Park Service.

Table D-3: Requirements and Counts of SLAMS O₃, Area Wide NO₂, and SO₂ Monitors (40 CFR Part 58, Appendix D, Sections 4.2, 4.3.2, and 4.7.1(b)(2))

CBSA	AQS ID and Site Name	SLAMS Monitors			O ₃			Area Wide NO ₂			SO ₂		
		O ₃	Area Wide NO ₂	SO ₂	Min.	Tot.	Met	Min.	Tot.	Met	Min.	Tot.	Met
Chattanooga, TN-GA	47-065-1011 (Soddy Daisy)	X	0	0	2	2	Y	0	0	Y	0	0	Y
	47-065-4003 (Eastside Utility)	X	0	0									
Clarksville, TN-KY	21-047-0006 (Hopkinsville) ¹	X	0	0	1	1	Y	0	0	Y	0	0	Y
Kingsport-Bristol, TN-VA	47-163-2002 (Blountville)	X	0	0	1	2	Y	0	0	Y	4	4	Y
	47-163-2003 (Kingsport Ozone)	X	0	0									
	47-163-6001	0	0	X									
	47-163-6002 (Skyland)	0	0	X									
	47-163-6003	0	0	X									
	47-163-6004	0	0	X									
Knoxville, TN	47-001-0101 (Freels Bend)	X	0	0	2	5	Y	0	0	Y	1	1	Y
	47-009-0101 (Look Rock) ²	X	0	X									
	47-093-0021 (East Knox)	X	0	0									
	47-093-1020 (Spring Hill)	X	0	0									
	47-105-0109 (Loudon)	X	0	0									
Memphis, TN-MS-AR	05-035-0005 (Marion) ¹	X	X	0	2	5	Y	1	1	Y	1	1	Y
	28-033-0002 (Hernando) ¹	X	0	0									
	47-157-0021 (Frayser)	X	0	0									
	47-157-0075 (Shelby Farms NCore)	X	0	X									
	47-157-1004 (Edmund Orgill Park)	X	0	0									
Morristown, TN	47-089-0002 (New Market)	X	0	0	1	1	Y	0	0	Y	0	0	Y
Nashville-Davidson-Murfreesboro-Franklin, TN	47-037-0011 (East Health Center)	X	X	0	2	5	Y	1	1	Y	1	1	Y
	47-037-0026 (Percy Priest)	X	0	0									
	47-037-0040 (Near Road Site)	0	0	X									
	47-165-0007 (Hendersonville)	X	0	0									
	47-187-0106 (Fairview)	X	0	0									

CBSA	AQ5 ID and Site Name	SLAMS Monitors			O ₃			Area Wide NO ₂			SO ₂		
		O ₃	Area Wide NO ₂	SO ₂	Min.	Tot.	Met	Min.	Tot.	Met	Min.	Tot.	Met
	47-189-0103 (Cedars of Lebanon)	X	0	0									

¹ Monitor is in another state's ambient air monitoring network plan and covered by a Memorandum of Agreement with a neighboring agency.

² Monitor operated by the National Park Service.

Table D-4: Requirements and Counts of SLAMS Near-road Monitors (40 CFR Part 58, Appendix D, Sections 4.2, 4.3.2, and 4.7.1(b)(2))

CBSA	AQ5 ID and Site Name	Near-Road Monitors			CO			NO ₂			PM _{2.5}		
		CO	NO ₂	PM _{2.5}	Min.	Tot.	Met	Min.	Tot.	Met	Min.	Tot.	Met
Memphis, TN-MS-AR	47-157-0100 (Southwest TN Community College)	1	1	1	1	1	Y	1	1	Y	1	1	Y
Nashville-Davidson-Murfreesboro-Franklin, TN	47-037-0040 (Near Road Site)	1	1	1	1	1	Y	1	1	Y	1	1	Y

Table D-5: Minimum Required SLAMS RA Monitors (40 CFR Part 58, Appendix D Sections 4.2.2, 4.3.4, and 4.4.2)

CBSA	AQ5 ID and Site Name	Pollutant	# of Minimum Required RA Monitors	# of RA Monitors in Plan	Requirement Met? (Y/N)
N/A	N/A	Carbon Monoxide	0	0	Y
N/A	N/A	Nitrogen Dioxide	0	0	Y
Kingsport-Bristol, TN-VA	47-163-6002 (Skyland Dr.)	Sulfur Dioxide	3	3	Y
	47-163-6003 (Andrew Johnson Elementary)				
	47-163-6004 (Happy Hill)				

Table D-6: Minimum Required SLAMS Source-Oriented and Collocated Pb Monitors (40 CFR Part 58, Appendix A, 3.4.4 and 40 CFR Part 58, Appendix D, Section 4.5)

CBSA	AQS ID and Site Name	Source Name	Source-oriented Pb			Collocated Pb		
			Min.	Tot.	Met	Min.	Tot.	Met
Kingsport-Bristol, TN-VA	47-163-3004 (Exide)	Exide Technologies	1	1	Y	1	1	Y
Knoxville, TN	47-093-0023 (Ameristeel)	Commercial Metals Company Steel US Plant	1	1	Y	1	1	Y

Table D-7: Minimum Required SLAMS PM₁₀ and Collocated PM₁₀ Monitors (40 CFR Part 58, Appendix A, Section 3.3 and 40 CFR Part 58, Appendix D, Section 4.6, and Table D-4)

CBSA	AQS ID and Site Name	Monitors		PM ₁₀			Collocated PM ₁₀		
		PM ₁₀	Col.	Min.	Tot.	Met	Min.	Tot.	Met
Chattanooga, TN-GA	Waiver granted ¹	0	0	1	0	Y	0	0	Y
Knoxville, TN	47-093-1013 (Air Lab)	1	0	1	1	Y	0	0	Y
Memphis, TN-MS-AR	47-157-0024 (Alabama Ave)	1	0	2	2	Y	0	0	Y
	47-157-0075 (Shelby Farms NCore)	1	0						
Nashville-Davidson-Murfreesboro-Franklin, TN	47-037-0023 (Lockeland)	1	0	2	1	Y	0	0	Y
	Waiver granted for second site ¹	N/A	N/A						

¹ Chattanooga-Hamilton County and Nashville-Davidson County requested renewals of the PM₁₀ waiver in their 2025 network plans/assessments. Waivers are required to be renewed in the Annual Network Plans due July 1, 2030.

Table D-8: Minimum Required PM_{2.5} and Collocated PM_{2.5} Monitors (40 CFR Part 58, Appendix A, Section 3.2 and 40 CFR Part 58, Appendix D, Section 4.7, and Table D-5)

CBSA	AQS ID and Site Name	PM _{2.5} Monitor					SLAMS Sites/Primary Monitors			Continuous		
		Type	Method Code	Cont.	Collocated Method Code	Other	Min.	Tot.	Met	Min.	Tot.	Met
Chattanooga, TN-GA	13-295-0004 (Rossville) ¹	SLAMS	145	X			2	2	Y	1	2	Y
	47-065-4002 (Siskin Drive)	SLAMS	145	X	145							
Clarksville, TN-KY	21-047-0006 (Hopkinsville)	SLAMS	636	X			1	2	Y	1	2	Y

CBSA	AQS ID and Site Name	PM _{2.5} Monitor					SLAMS Sites/Primary Monitors			Continuous		
		Type	Method Code	Cont.	Collocated Method Code	Other	Min.	Tot.	Met	Min.	Tot.	Met
	47-125-2001 (Clarksville)	SLAMS	209	X								
Jackson, TN	47-113-0010 (Jackson)	SLAMS	209	X			0	1	Y	0	1	Y
Kingsport-Bristol, TN-VA	47-163-1007 (Kingsport D Street)	SLAMS	209	X			0	1	Y	0	1	Y
Knoxville, TN	47-009-0101 (Look Rock)	Non-EPA Federal	716	X		I, TP	2	4	Y	1	5	Y
	47-093-1013 (Air Lab)	SLAMS	638	X	145							
	47-093-1017 (Rule)	SLAMS	636	X	145							
	47-093-1020 (Spring Hill)	SLAMS	636	X								
	47-105-0109 (Loudon)	SLAMS	209	X								
Lawrenceburg, TN	47-099-0003 (Loretto)	SLAMS	209	X		BG	1	1	Y	1	1	Y
Memphis, TN-MS-AR	05-035-0005 (Marion) ¹	SLAMS	143				3	5	Y	2	2	Y
	28-033-0002 (Hernando) ¹	SLAMS	636	X								
	47-157-0024 (Alabama Ave)	SLAMS	145		145							
	47-157-0075 (Shelby Farms NCore)	SLAMS	145	X								
	47-157-0100 (Southwest TN Community College)	SLAMS	145			NR						
Nashville-Davidson-Murfreesboro-Franklin, TN	47-037-0023 (Lockeland)	SLAMS	209	X	145		3	3	Y	2	3	Y
	47-037-0040 (Near Road)	SLAMS	209	X		NR						
	47-165-0007 (Hendersonville)	SLAMS	209	X	145							

BG = Background; TP = Transport; I = IMPROVE; NR = Near-road; ^P = Primary monitor

¹These monitors are in other states networks and only listed here as a courtesy. They will be evaluated separately as part of their own annual network plan process.

Table D-9: Minimum Required Collocated PM_{2.5} Monitors (40 CFR Part 58 Appendix A, Section 3.2.3.1)

PQAO	AQS ID and Site Name	Method	AQS Method Code	# of Primary PM _{2.5} Monitors	# of Minimum Required Collocated PM _{2.5} Monitors	# of Collocated PM _{2.5} Monitors	Requirement Met? (Y/N)
TDEC	47-105-0109 (Loudon)	Met One BAM-1022	209	12	2	2	Y
	47-165-0007 (Hendersonville)	Thermo 2025i	145				
Chattanooga-Hamilton County	47-065-4002 (Siskin)	Thermo 2025i	145	1	1	1	Y
Knox County (KCDAQM)	47-093-1013 (Air Lab)	Teledyne T640x	638	1	1	1	Y
	47-093-1017 (Rule)	Teledyne T640	636	1	1	1	Y
Memphis-Shelby County (SCHD)	47-157-0024 (Alabama Ave.)	Thermo 2025i	145	3	1	1	Y
Nashville-Davidson County	47-037-0023 (Lockeland)	Met One BAM-1022	209	2	1	1	Y

Table D-10: Continuous PM_{2.5} Monitors using Non-FRM or Non-FEM Methods

CBSA	AQS ID and Site Name	Method Description	Method Code	Comments
Knoxville, TN	47-009-0101 (Look Rock)	TEOM Gravimetric 30 deg C	715	Operated by the National Park Service.

Table D-11: PM_{2.5} NAAQS Exclusions (40 CFR Part 58.11(e))

CBSA	AQS ID and Site Name	FEM Method Description	FEM Method Code	Comments
Chattanooga, TN-GA	47-065-4002 (Siskin)	Teledyne API T640	636	The 2-year evaluation period is over as of September 29, 2025. However, the local agency submitted a formal request on September 11, 2025, showing that this monitor does not meet the performance criteria when compared to their collocated FRMs. Currently, the Region agrees and will complete a full evaluation once all data have been entered into AQS through this date. The EPA will work with the state and the local agency to determine a path forward for these data and

				this will be included in the local agency's network plan due by July 1, 2026.
Memphis, TN-MS-AR	47-157-0075 (Shelby Farms NCore)	Teledyne API T640x	638	The 2-year evaluation period is over as of October 25, 2025. Once all the PM _{2.5} data are reported to AQS through this date, the Region will work with the state and the local agency to reevaluate the comparability of the PM _{2.5} data from the Teledyne T640x to the Thermo 2025i FRM and determine a path forward for these data and this will be included in the local agency's network plan due by July 1, 2026.
Nashville-Davidson-Murfreesboro-Franklin, TN	47-037-0023 (Lockeland)	Teledyne API T640x	638	The 2-year evaluation period is over as of September 11, 2025. Once all the PM _{2.5} data are reported to AQS through this date, the Region will work with the State and the local agency to reevaluate the comparability of the PM _{2.5} data from the Teledyne T640x to the Thermo 2025i FRM and determine a path forward for these data and this will be included in the local agency's network plan due by July 1, 2026.

Table D-12: PM_{2.5} Chemical Speciation Network (CSN) (40 CFR Part 58 Appendix D, Section 4.7.4)

CBSA	AQS ID and Site Name	Network	Sampling Frequency
Chattanooga, TN-GA	13-295-0004 (Rossville) ¹	CSN Supplemental	1-in-6 days
Knoxville, TN	47-093-1020 (Spring Hill)	CSN Supplemental	1-in-6 days
Memphis, TN-MS-AR	47-157-0075 (Shelby Farms NCore)	STN	1-in-3 days

¹Monitor is in another state's ambient air monitoring network plan and covered by a Memorandum of Agreement with a neighboring agency.

Table D-13: Photochemical Assessment Monitoring Stations (40 CFR Part 58, Appendix D, Section 5.0)

CBSA	AQS ID and Site Name	Compounds Measured	Sampling Frequency
Memphis, TN-MS-AR	47-157-0075 (Shelby Farms NCore)	PAMS	Varies based on pollutant group as specified in 40 CFR Part 58, Appendix D, Section 5.0.

Table D-14: Air Toxics Monitoring

CBSA	AQS ID and Site Name	Network	Activity	The EPA Comments
Memphis, TN-MS-AR	N/A	N/A	The SCHD, in conjunction with the University of Memphis, was awarded a community-scale Air Toxics Monitoring Program grant from the EPA to evaluate an emerging testing method for air toxics. The goal of the study is to validate low-cost, miniature thermal desorption samplers for sampling and analysis of polycyclic aromatic hydrocarbons and volatile organic compounds in the ambient air and demonstrate their applicability for community monitoring programs. Method development is ongoing, and a final report was expected in September 2024.	The EPA requests that the SCHD include information about this grant, including the final report (or a summary if the final report is not developed by then) of the study, in the annual network plan due by July 1, 2026.

Table D-15: Non-SLAMS Monitors

CBSA	AQS ID and Site Name	Pollutant	Monitor Type
Athens, TN	47-107-1002 (Athens)	PM _{2.5}	SPM
N/A, Claiborne County, TN	47-025-9991 (Speedwell)	O ₃	CASTNET
Cookeville, TN	47-141-0005 (Cookeville)	PM _{2.5}	SPM
N/A, DeKalb County, TN	47-041-9991 (Edgar Evins)	O ₃	CASTNET
Knoxville, TN	47-009-0011 (Maryville)	PM _{2.5}	SPM
	47-105-0004 (Harriman)	PM _{2.5}	SPM
	47-009-0101 (Look Rock)	PM _{2.5}	SPM
	47-009-0102 (Cade's Cove)	O ₃	Non-EPA Federal
Nashville-Davidson-Murfreesboro-Franklin, TN	47-119-2007 (Columbia)	PM _{2.5}	SPM
Sevierville, TN	47-155-0101 (Cove Mountain)	O ₃	Non-EPA Federal
	47-155-0102 (Clingman's Dome)	O ₃	Non-EPA Federal

Table D-16: Summary of EPA Approved Waivers of Requirements

CBSA	AQS ID and Site Name	Pollutant(s)	CFR Requirement Waived	The EPA Waiver Authority/ Rationale	Year Waiver First Granted	Waiver Expiration Year	Comments
Chattanooga, TN-GA	None	PM ₁₀	40 CFR Part 58, App. D, Section 4.6, Table D-4	40 CFR Part 58, App. D, Section 4.6	2015	2030	Approved 2025: renewal of PM ₁₀ monitoring waiver for the Chattanooga, TN-GA MSA.
Nashville-Davidson-Murfreesboro-Franklin, TN	None	PM ₁₀	40 CFR Part 58, App. D, Section 4.6, Table D-4	40 CFR Part 58, App. D, Section 4.6	2016	2030	Approved 2025: renewal of PM ₁₀ monitoring waiver.
Sevierville, TN	Clingman's Dome (Remote mountain top site)	O ₃	40 CFR Part 58, Appendix D, Table D-3	40 CFR Part 58, Appendix D, Section 4.1 (i)	2016	On-going	Approved renewal of delayed O ₃ season monitoring waiver. Site inaccessible due to weather. Approved O ₃ season as defined in AQS is May – October each year.