

# Georgia Department of Natural Resources

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

Environmental Protection Division

404/656-4713

February 22, 2005

Beverly Bannister  
Director  
Air, Pesticides, and Toxics Management Division  
U.S. EPA, Region 4  
161 Forsyth Street, SW  
Atlanta, Georgia 30303-3104

Re: PM<sub>2.5</sub> Nonattainment Area Designations  
Additional Submission of 2004 Data  
and Request for Change of Designation  
Status

Dear Ms. Bannister:

On February 16, 2005 we submitted additional information for 2004 PM<sub>2.5</sub> Georgia monitors, and requested a change of designation status for the Athens and Columbus areas. We also advised you that we would be submitting additional information to you regarding Catoosa and Walker Counties and an alternate partial county recommendation for Putnam County. With this letter we are submitting that information.

## **Catoosa and Walker Counties**

Our September 1, 2004 letter to EPA recommended that Walker County be designated unclassifiable, due to questions about how 2004 data could better represent air quality at the Rossville PM<sub>2.5</sub> monitoring site. EPD further recommended that Catoosa County be classified as attainment based on our review of other factors. We further recommended that should additional data available in late 2004 not indicate that the Rossville monitor will attain the PM<sub>2.5</sub> standard using 2002-2004 data or should EPA reject EPD's unclassifiable recommendation for Walker County, only a portion of Walker County should be included in the Chattanooga PM<sub>2.5</sub> nonattainment area. We determined that these recommendations were appropriate to address the magnitude of PM 2.5 nonattainment in the Chattanooga area.

On January 5, 2005, EPA promulgated designations for the new Fine Particle National Ambient Air Quality Standard (PM<sub>2.5</sub>), designating both Catoosa and Walker counties as nonattainment.

Since that time we have been further analyzing the air quality monitoring in the area, working with the Chattanooga-Hamilton County Air Pollution Control Bureau, and have determined that PM 2.5 concentrations in the Chattanooga MSA, which includes Walker County, have been influenced by fires well outside the region. Therefore, a combined request to flag the data of April 15, June 26-29 and August 19, 22, 25 and 28, 2003 was submitted November 15, 2004. Hamilton County has already flagged the Tennessee sites data and we are in the process of flagging the PM 2.5 data for the Rossville, Georgia site.

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Our review of the data indicates that if even some of this flagged data is not considered, the Walker County site could demonstrate attainment, which should influence how EPA considers all the other relevant factors it used in taking its final action January 5. Based on this additional review of the monitoring data, we recommend that EPA place a concurrence data flag, revise its January 5 action, and designate both Catoosa and Walker counties in attainment.

During a meeting with you and your staff on February 11, 2005 we discussed this in more detail and agreed that this issue relating to representative PM 2.5 data for the area needs to be explored more closely prior to April 5, 2005, when the January 5 nonattainment designation actions become effective. We will continue to work with you closely between now and April 5 to ensure that EPA has all the data and information required to address this issue.

### **Putnam County**

EPD had previously recommended that all of Putnam County be designated attainment. EPA's January 5 action, though, designated a portion of Putnam County as nonattainment. We understand that the main reason this portion was included as part of the Atlanta PM 2.5 nonattainment area was to include the emissions from Georgia Power Plant Branch.

Since the January 5 action EPD has reviewed the partial area (Census Block Group 9603-1). We have determined that this area is larger than needed to include the Plant Branch emissions, could unduly impact other sources in the county, and will create potential transportation conformity complications. We recommend that an alternate partial area be considered, following from the Census data approach used by EPA. We recommend that Census Blocks 1025, 1060, 1061, and 1062 within Census Block Group 9603-1 be the designated nonattainment area in Putnam County. [see attached map]

While EPA's January 5 action offered the opportunity to submit 2004 PM 2.5 data, we believe that it is also appropriate to consider this alternate geographic area, even though it is not specifically related to PM 2.5 data.

- EPD is not disputing the designation of a portion of Putnam County.
- Until EPA's final January 5, 2005 action, EPD was not able to review the specific portion of Putnam County to determine its impact. This additional time has allowed EPD to identify potential impacts not fully considered by EPA in its January 5 action. Therefore, it is appropriate for EPA to consider this alternate area that will achieve the same effect of including the Plant Branch emissions.
- We understand that EPA acknowledges the potential complications of partial areas like in Putnam County and is considering some relief to this issue by designating this and other such partial areas as rural isolated areas. While we appreciate this review and encourage EPA to follow-up with this action, a more direct approach, would be to start with this alternate area as requested, to more properly include the only emission source in the

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- county that EPA determined was significantly contributing to Atlanta area PM 2.5 nonattainment
- Following the April 2004 ozone nonattainment designations EPD proposed an alternate partial area for Monroe County, to address very similar issues. EPA reviewed this alternate area and took action to revise the area prior to the final effective date, as we are requesting here, so there is some precedent to this request.

The recommendations in this and in our February 16, 2005 letter are very important to Georgia, and we appreciate the opportunity EPA has provided us to submit final data before these actions become effective. We will continue to work closely with you to provide any additional information is needed to consider these requests.

If you have any questions or need more information, please contact me at (404) 363-7016 or Jimmy Johnston at (404) 363-7014.

Sincerely,



Ronald Methier

Chief

Air Protection Branch

RM:jjj

c: Kay Prince, U.S. EPA  
Jimmy Johnston  
Jim Kelly  
Susan Zimmer-Dauphinee

Attachment



# U.S. Census Bureau

## American FactFinder

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**Legend**

**Boundaries**

- State
- '00 County
- '00 Census Tract
- '00 Block Group
- '00 Block
- '00 Place
- '00 Place
- '00 Urban Area
- '00 Urban Area

**Features**

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

