

Georgia Department of Natural Resources

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Noel Holcomb, Commissioner
Carol A. Couch, PhD., Director
Environmental Protection Division
404/656-4713

September 1, 2004

James I. Palmer, Jr.
Regional Administrator
U.S. EPA, Region 4
161 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Re: PM_{2.5} Nonattainment Area Designations
Additional Information for Consideration

Dear Mr. Palmer:

The United States Environmental Protection Agency (EPA) promulgated a new Fine Particle National Ambient Air Quality Standard (PM_{2.5}). Section 107 (d)(1) of the Clean Air Act requires each state to submit to the EPA its recommended designation of each area of the State as attainment/unclassifiable or nonattainment under the standard. On February 13, 2004, the Georgia Environmental Protection Division (the Division) submitted initial recommendations for the designation status of each county in Georgia. Revised recommendations with supporting information were submitted to EPA on June 15, 2004, and June 17, 2004. On June 29, 2004, EPA submitted a letter to Governor Sonny Perdue notifying him of EPA's intent to modify Georgia's PM_{2.5} nonattainment recommendations. This letter and the attached supporting information are submitted in response to that letter.

The Division is for the most part pleased that U.S. EPA has accepted most of Georgia EPD's recommendations for PM_{2.5} nonattainment boundaries. However, there are still a few counties which EPD has determined should not be included in any PM_{2.5} nonattainment area. Additional information relating to these counties is contained in or attached to this letter. In addition, Georgia EPD had not completed its analysis of the Georgia portion of the Chattanooga PM_{2.5} nonattainment area when we revised our PM_{2.5} nonattainment recommendations on June 17, 2004. This analysis has been complete and is included for your consideration.

EPA's June 29th letter did not address much of the information included in EPD's June 17, 2004, submission including the revised L-Score methodology and much of the "other factors" considered by EPD. We continue to believe that U.S. EPA should consider the level of control of emission sources as significant in the decision making process. Georgia EPD supplied detailed information concerning existing control measures that go beyond those required across the state and which are already in place in most of the counties analyzed. Georgia urges U.S. EPA to reconsider the information included in EPD's June 17th submittal and is willing to meet with EPA staff to discuss these analyses.

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Based on additional analysis explained in attached documents, EPD is revising its recommended designations and responds to EPA's proposed modifications of EPD's classification recommendations as follows:

Recommendations that Certain Areas be Classified as "unclassifiable"

Based on PM_{2.5} monitoring trends through mid-2004, it is very possible that the 2002-2004 data will indicate attainment for the Athens monitor, the Macon Allied Chemical monitor (the Macon Forestry Office monitor already shows attainment), and the Rossville monitor. Data indicating these trends is included in attachment 3. We will have more complete data later this Fall, before U.S. EPA's expected November action. If these monitoring trends continue, EPD recommends that Clarke County, Bibb County, the partial county area of Monroe County that includes Plant Scherer, and Walker County be designated as "unclassifiable."

Chattanooga PM_{2.5} Nonattainment Area

U.S. EPA's June 29, 2004 letter included all of the Georgia Counties that are part of the Chattanooga MSA in the Chattanooga PM_{2.5} nonattainment area. It is our understanding that this was due in part to the fact that EPD had not submitted an analysis of this area prior to EPA's June 29th letter. EPD has completed this analysis and it is attached. EPD has recommended above that Walker County be designated unclassifiable and further recommends that Catoosa County and Dade County be classified as "attainment". Should additional data available this fall not indicate that the Rossville monitor will attain the PM_{2.5} standard using 2002-2004 data or should U.S. EPA reject EPD's unclassifiable recommendation for Walker County, we recommend that the portion of Walker County as described below be included in the Chattanooga PM_{2.5} nonattainment area.

From the west Walker County line ¾ of a mile south of Lookout Mtn. city limits, the boundary travels southeast to the 3700 block of Lula Lake Rd. Boundary then travels south intersecting the 2200 block of Nick-a-Jack Rd. and continues south 1 ½ miles. Boundary then travels east to 7600 block of Hwy 193 at N. Cedar Ln. intersection. Boundary then travels east following southern right of way of Walker Hollow Rd. to 1500 block of N. Marbletop Rd. Boundary then travels southeast intersecting 400 block of Childress Hollow Rd. and continuing east to east right of way of McCarty Rd. Boundary then travels south ½ mile. Boundary then travels east to north right of way of Peter Lewis Trl. Boundary then travels southeast to 1100 block of S. Hwy 341 at Garretts Chapel Rd. intersection. Boundary then travels southeast to southern right of way of Hames Rd. and Driftwood Dr. Boundary then travels east to intersect 800 block of Lofton Ln. Boundary then travels northeast to 100 block of Glass Mill Rd. at Old Bethel Rd. intersection. Boundary then travels east along southern right of way of Glass Mill Rd. Boundary then intersects 500 block of Old LaFayette Rd. at Glass Mill Rd. intersection. Boundary continues east intersecting 9900 block of N. Hwy 27, 300 block of Arnold Rd., and 500 block of Long Hollow Rd. Boundary continues east to 1200 block of Peaving Rd. at E. Long Hollow Rd. intersection. Boundary continues east along southern right of way of Peavine Rd. to east Walker County line.

Clearly the opportunity for a partial county designation is something EPA is willing to consider (EPA's June 29, 2004 suggestion regarding both Putnam and Jasper counties, for example). In evaluating this recommendation, EPA should consider Walker County's geography, the location of

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the emission sources, other factors we have analyzed, and the fact that the northern urbanized area is not unlike the localized stationary sources EPA refers to in Jasper and Putnam counties.

The complete analysis and a map of the partial county area are included in attachment 4.

Atlanta PM2.5 Nonattainment Area

U.S. EPA's June 29, 2004 letter added Jasper and Putnam Counties to Georgia EPD's recommendation for the Atlanta PM2.5 nonattainment area. EPA's letter also suggested that EPD submit partial county recommendations for those counties. EPD has determined that it is not practical to design partial county nonattainment boundaries for Jasper and Putnam County. We have also conducted additional analysis using EPA's wind direction frequency data that, together with information submitted with our June 17th recommendation, supports EPD's earlier recommendation that neither Jasper nor Putnam County be included in the Atlanta PM2.5 nonattainment area. Also, by designating Jasper and Putnam County "attainment" for PM2.5, the Atlanta PM2.5 nonattainment boundary will be basically identical to the Atlanta 8-hour ozone nonattainment boundary ensuring more efficient air quality and transportation planning. EPD's additional analysis of Putnam County is included in attachment 5.

Athens PM2.5 Nonattainment Area

U.S. EPA's June 29, 2004 letter added Madison and Oconee Counties to Georgia EPD's recommendation for the Athens PM2.5 nonattainment area. In our June 17th submission, EPD did not analyze Oconee County for the 7 "other factors," since EPD's Updated L-Score analysis indicated that the urban excess from Oconee County did not significantly impact on the Athens area. Since U.S. EPA has included Oconee County in its recommendation for the Athens PM2.5 nonattainment area, EPD has conducted additional analysis for Oconee County. Also, EPD has conducted an analysis of meteorological factors that was not included in our June 17th submittal. Both of these analyses, together with the information already submitted to U.S. EPA on June 17th, indicate that neither Oconee nor Madison should be included in the Athens PM2.5 nonattainment area. Additionally, should EPA accept EPD's recommendation that Clarke County be designated as unclassifiable, then Madison and Oconee Counties should be designated either as attainment or unclassifiable. The additional analyses for Oconee and Madison Counties are contained in attachment 6.

Columbus/Phenix City Nonattainment Area

EPD does not agree with U.S. EPA's recommended boundary. However, On July 28, 2004, EPD, in cooperation with Alabama's Department of Environmental Management, submitted a request for revision to the PM2.5 Monitoring Plan for the Columbus/Phenix City area. U.S. EPA's prompt action on this request will result in the attainment designation for the entire Columbus/Phenix City area, including both Muscogee and Harris County in Georgia.

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State Recommendations

A table indicating Georgia EPD's revised recommendations for all counties and partial counties in the state and a map indicating EPD's revised designations is attached.

Please note that during this evaluation, EPD discovered that the vehicle miles traveled (VMT) data posted on EPA's PM2.5 technical information web site and used by both EPA and Georgia EPD in attainment designation analysis is incorrect. EPD has used correct VMT data for the analyses created

for this response. EPD will be checking the VMT data utilized in the data supporting our June 17, 2004, submittal and will notify EPA if the updated VMT data alters any of those analysis results.

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

Sincerely,

Carol A. Couch, Ph.D
Director

CAC:jjp
no attachments

c: Kay Prince, U.S. EPA (w. attachments)
Ron Methier
Jimmy Johnston