

Appendix H.4

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Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

4244 International Parkway • Suite 120 • Atlanta • Georgia 30354

404/363-7000 • Fax: 404/363-7100

Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Cliff Chamblee
Environmental Control Supervisor
Georgia-Pacific Corp. - Cedar Springs Op
P O Box 44
Cedar Springs, GA 31732

Re: Regional Haze Four-Factor Analysis

Dear Mr. Chamblee:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Recovery Boiler No. 3, Power Boiler No. 1, and Power Boiler No. 2 (Unit ID Nos. R402, U500, U501, respectively) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

- Step 1: Identification of all control technologies;
- Step 2: Elimination of technically infeasible options;
- Step 3: Ranking of remaining control technologies by control effectiveness;
- Step 4: Application of the first three statutory factors (cost of compliance, time necessary for compliance, energy and non air quality environmental impacts) to the control technologies identified in step 3 and documentation the results; and
- Step 5: Selection of control technology.

EPD requests that you submit this analysis to the Division by close of business on May 31, 2007. If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014 or via email at jimmy_johnston@dnr.state.ga.us.

Sincerely,

A handwritten signature in black ink that reads "Heather M. Abrams". The signature is written in a cursive, slightly slanted style.

Heather Abrams
Chief
Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Ms. Mary K. Hoffmann
Senior Environmental Engineer
Savannah River Mill, Fort James Operating Co., Technical Department
393 Fort Howard Road
Rincon, GA 31326

Re: Regional Haze Four-Factor Analysis

Dear Ms. Hoffmann:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

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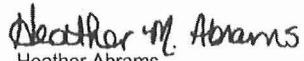
An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Boiler No. 3, Boiler No. 4, and Boiler No. 5 (Unit ID Nos. BO01, BO02, and BO03, respectively) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

- Step 1: Identification of all control technologies;
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Sincerely,

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Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston

James Kelly

James Boylan

Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Ms. Donna D. Katula
Environmental Manager
International Paper - Savannah Mill
P.O. Box 570
Savannah, GA 31402

Re: Regional Haze Four-Factor Analysis

Dear Ms. Katula:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, No. 13 Power Boiler (Unit ID No. PB13) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

- Step 1: Identification of all control technologies;
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Sincerely,

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Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

April 6, 2007

Mr. Bryan Beyer
Acid Operations Manager
Southern States Phosphate & Fertilizer Company
P.O. Box 546
Savannah, GA 31404

Re: Regional Haze Four-Factor Analysis

Dear Mr. Beyer:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Sulfuric Acid Plant No. 2 (Unit ID No. SA02) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

- Step 1: Identification of all control technologies;
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- Step 5: Selection of control technology.

Regional Haze Four-Factor Analysis

Page 2

EPD requests that you submit this analysis to the Division by close of business on May 31, 2007. If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014 or via email at jimmy_johnston@dnr.state.ga.us.

Sincerely,

A handwritten signature in cursive script that reads "Heather Abrams".

Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston

James Kelly

James Boylan

Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Mike E. Wilder
Air Programs Manager
Georgia Power Company/ Environmental Affairs
241 Ralph McGill Boulevard / Bin 10221
Atlanta, GA 30308

Re: Regional Haze Four-Factor Analysis
Savannah Electric – Plant Kraft

Dear Mr. Wilder:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

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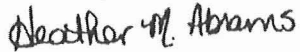
An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Steam Generator Units 1, 2 and 3 (Unit ID Nos. SG01, SG02, and SG03, respectively) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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Sincerely,

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Heather Abrams
Chief
Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Mike E. Wilder
Air Programs Manager
Georgia Power Company/ Environmental Affairs
241 Ralph McGill Boulevard / Bin 10221
Atlanta, GA 30308

Re: Regional Haze Four-Factor Analysis
Savannah Electric - Plant McIntosh

Dear Mr. Wilder:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

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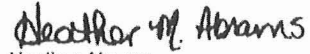
An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Boiler No. 1 (Unit ID No. SG01) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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EPD requests that you submit this analysis to the Division by close of business on May 31, 2007. If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014 or via email at jimmy_johnston@dnr.state.ga.us.

Sincerely,

Handwritten signature of Heather M. Abrams in black ink.

Heather Abrams
Chief
Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Mike E. Wilder
Air Programs Manager
Ga Power Company / Environmental Affairs
241 Ralph McGill Boulevard / Bin 10221
Atlanta, GA 30308

Re: Regional Haze Four-Factor Analysis
Plant Mitchell

Dear Mr. Wilder:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

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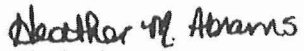
An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Steam Generating Unit No. 3 (Unit ID No. SG03) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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Heather Abrams
Chief
Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Ms. Jill R. Holmes
Senior Environmental Engineer
Koch Cellulose/GA Pacific Brunswick
P O Box 1438
Brunswick, GA 31521

Re: Regional Haze Four-Factor Analysis

Dear Ms. Holmes:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

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An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, the Multi-Fuel Bark Fired Boiler and the No. 6 Recovery Boiler (Unit ID Nos. F1 and M24) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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EPD requests that you submit this analysis to the Division by close of business on May 31, 2007. If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014 or via email at jimmy_johnston@dnr.state.ga.us.

Sincerely,


Heather Abrams
Chief
Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

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Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

March 21, 2007

Ms. E. Annette White
Assistant Technical Manager/Environmental
Inland Paperboard & Packaging - Linerboard
P. O. Box 1551
Rome, GA 30162-1551

Re: Regional Haze Four-Factor Analysis

Dear Ms. White:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

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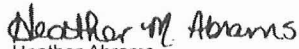
An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Power Boiler No. 4 (Unit ID No. F4) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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Heather Abrams
Chief
Air Protection Branch

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Georgia Department of Natural Resources

**Environmental Protection Division • Air Protection Branch
4244 International Parkway • Suite 120 • Atlanta • Georgia 30354**

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**Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director**

March 21, 2007

Ms. Janice Zimmerman
Environmental Compliance Administrator
Miller Brewing Company
405 Cordele Road
Albany, GA 31705

Re: Regional Haze Four-Factor Analysis

Dear Ms. Zimmerman:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

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An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Riley Boiler No. 1 and Riley Boiler No. 2 (Unit ID Nos. B001 and B002) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

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Regional Haze Four-Factor Analysis

Page 2

EPD requests that you submit this analysis to the Division by close of business on May 31, 2007. If you have any questions or need more information, please contact Jimmy Johnston at (404) 363-7014 or via email at jimmy_johnston@dnr.state.ga.us.

Sincerely,

Handwritten signature of Heather M. Abrams in black ink.

Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

4244 International Parkway • Suite 120 • Atlanta • Georgia 30354

404/363-7000 • Fax: 404/363-7100

Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Ronald J. Beegle
Corp. Director Environmental Affairs
Mount Vernon Mills, Inc. - Apparel Fabric
P.O. Box 7
Trion, GA 30753

Re: Regional Haze Four-Factor Analysis

Dear Mr. Beegle:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, Boiler No. 3 and Boiler No. 4 (Unit ID Nos. EU03, and EU04) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

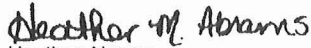
- Step 1: Identification of all control technologies;
- Step 2: Elimination of technically infeasible options;
- Step 3: Ranking of remaining control technologies by control effectiveness;
- Step 4: Application of the first three statutory factors (cost of compliance, time necessary for compliance, energy and non air quality environmental impacts) to the control technologies identified in step 3 and documentation the results; and
- Step 5: Selection of control technology.

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Sincerely,

A handwritten signature in black ink that reads "Heather M. Abrams". The signature is written in a cursive style with a large, stylized 'H' and 'A'.

Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

Georgia Department of Natural Resources

**Environmental Protection Division • Air Protection Branch
4244 International Parkway • Suite 120 • Atlanta • Georgia 30354**

404/363-7000 • Fax: 404/363-7100

**Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director**

March 21, 2007

Mr. David Rogers
Environmental Control Manager
Rayonier, Inc. - Jessup Mill
P.O. Box 2070
Jesup, GA 31598-0207

Re: Regional Haze Four-Factor Analysis

Dear Mr. Rogers:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, No. 2 Power Boiler, No.3 Power Boiler, No. 5 Recovery Furnace, and No. 6 Recovery Furnace (Unit ID Nos. PB02, PB03, RF01, and RF04, respectively) at your facility have been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

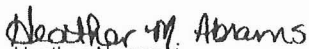
- Step 1: Identification of all control technologies;
- Step 2: Elimination of technically infeasible options;
- Step 3: Ranking of remaining control technologies by control effectiveness;
- Step 4: Application of the first three statutory factors (cost of compliance, time necessary for compliance, energy and non air quality environmental impacts) to the control technologies identified in step 3 and documentation the results; and
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Sincerely,



Heather Abrams

Chief

Air Protection Branch

c: Jimmy Johnston
James Kelly
James Boylan
Elisabeth Munsey

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Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

March 21, 2007

Mr. Mike Kelly
Plant Environmental Manager
Savannah Sugar Refinery
Post Office Box 710
Savannah, GA 31498

Re: Regional Haze Four-Factor Analysis

Dear Mr. Kelly:

Under the Environmental Protection Agency's Regional Haze Rule (citation), the Georgia Environmental Protection must submit to EPA a State Implementation Plan (SIP) that establishes reasonable progress towards achieving natural visibility conditions. In order to achieve this uniform rate of progress, EPD must establish reasonable progress goals through emissions reductions defined in the state's SIP submittal.

Section 169A(g)(1) of the CAA and Section 51.308(d)(1)(i)(A) of the Regional Haze Rule deems that States must consider four "statutory factors" in consultation with other affected States, Federal Land Managers, and all stakeholders, in determining their reasonable progress goals.

These following four statutory factors are:

- a) The costs of compliance,
- b) The time necessary for compliance,
- c) The energy and non air quality environmental impacts of compliance, and
- d) The remaining useful life of existing sources that contribute to visibility impairment.

An analysis of wind trajectory residence times, 2018 SO₂ emission projections, and distance from nearby Class I areas allowed EPD to identify sources likely to contribute more than 0.5% to the total visibility impairment caused by sulfate at nearby Class I areas in 2018. Based on this analysis, D Boiler (Unit ID No. U161) at your facility has been included on EPD's list of sources that significantly impact one or more Class I areas. As such, we are requesting that you evaluate the feasibility of additional SO₂ controls based on the four statutory factors required to be analyzed in the setting of reasonable progress goals.

First, the fourth factor "remaining useful life of existing source" should be applied to the emission unit. If the remaining useful life extends beyond 2018, EPD requests the other three statutory factors be analyzed using a "top-down" approach as follows:

- Step 1: Identification of all control technologies;
- Step 2: Elimination of technically infeasible options;
- Step 3: Ranking of remaining control technologies by control effectiveness;
- Step 4: Application of the first three statutory factors (cost of compliance, time necessary for compliance, energy and non air quality environmental impacts) to the control technologies identified in step 3 and documentation the results; and
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Sincerely,



Heather Abrams
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