



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

SEP 17 2008

SEP 11 2008

Carol A. Couch, Ph.D., Director  
Georgia Environmental Protection Division  
Suite 1152, East Tower  
Two Martin Luther King Jr. Drive  
Atlanta, Georgia 30334

RECEIVED

OCT 23 2008

AIR PROTECTION BRANCH

Dear Dr. Couch:

Thank you for your August 19, 2008, letter and the September 8, 2008, email concerning the application of the new Interagency Monitoring of Protected Visual Environments (IMPROVE) equation. The September 8, 2008, email provided additional documentation for the enclosures in your letter. You requested approval to use this new methodology to estimate visibility impacts from two Georgia facilities to implement the Best Available Retrofit Technology requirement of the Regional Haze Rule.

The new methodology uses a spreadsheet developed by the Visibility Improvement – State and Tribal Association of the Southeast to post-process the visibility modeling output from the CALPUFF and CALPOST models. The spreadsheet implements the new IMPROVE equation for calculating visibility impacts that was adopted by the IMPROVE Steering Committee in December 2005. The U.S. Environmental Protection Agency, Region 4 has previously provided comments indicating that new methodology is an alternative modeling approach and should meet the requirements in Section 3.2 of Appendix W, *Guideline on Air Quality Models* contained in 40 C.F.R. Part 51. We have reviewed your demonstration for using the new methodology, which includes a rationale for the need to use the new IMPROVE equation, a discussion of the performance of the equation versus measured values, a submittal of the modified post-processing methodology, and documentation to support the development of concentrations for the different terms in the equation. Based on the demonstration provided in your letter, we approve your request.

We appreciate your desire to protect and preserve the environment. If we may be of further assistance, please contact me or have a member of your staff contact Beverly Banister, Director of the Region 4 Air, Pesticides and Toxics Management Division, at (404) 562-9077.

Sincerely,

J. I. Palmer, Jr.  
Regional Administrator