GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Director's Office
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SEP 2 3 2016

Heather McTeer Toney
Regional Administrator
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Re: Georgia's Designation Recommendations for the 2015 Ozone NAAQS

Dear Ms. Toney:

On October 1, 2015, the United States Environmental Protection Agency (EPA) promulgated a revised National Ambient Air Quality Standard (NAAQS) for ozone. Section 107(d)(1) of the Clean Air Act requires each state to submit to EPA no later than one year following promulgation of a new or revised NAAQS, its designation recommendations for each area of the state as attainment, nonattainment, or unclassifiable under the standard. The Georgia Environmental Protection Division (EPD) developed designation recommendations in accordance with U.S. EPA's February 25, 2016 memorandum "Area Designations for the 2015 Ozone National Ambient Air Quality Standards".

The attached table (Table 1) provides EPD's recommendations for the designation status of each county in Georgia. Georgia's recommendations are based on 2013-2015 design values calculated using certified monitoring data and 2014-2016 design values calculated using preliminary 2016 ozone data. A list of 2013-2015 and preliminary 2014-2016 ozone design values for all monitors in Georgia is attached in Table 2. A spatial plot of the preliminary 2014-2016 ozone design values is attached in Figure 1. It can be seen from Figure 1 that the five Georgia monitors violating the 70 ppb NAAQS are all located in the Atlanta--Athens-Clarke County--Sandy Springs, GA Combined Statistical Area (CSA).

Based on a rigorous 5-factor analysis and source contribution photochemical grid modeling, EPD recommends that the following eight (8) counties be designated **nonattainment** for the 2015 ozone NAAQS (Figure 2):

- Bartow,
- Clayton,
- Cobb,
- DeKalb,
- Fulton,
- Gwinnett,
- Henry, and
- Rockdale.

In addition, EPD recommends that all other counties in Georgia be designated as **unclassifiable/attainment** for the 2008 ozone NAAQS. A detailed technical analysis to support our recommendations is attached.

If you have any questions or need more information, please contact James Boylan at James.Boylan@dnr.ga.gov or (404) 363-7014.

Sincerely,

Richard E. Dunn
Director

Attachments

c: Scott Davis, U.S. EPA Region 4
Lynorae Benjamin, U.S. EPA Region 4
Karen Hays, Branch Chief, Air Protection Branch