

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

Mark Williams, Commissioner
Judson H. Turner, Director

AUG 30 2012

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

RE: Maintenance Plan and Redesignation Request for the Atlanta, Georgia, 1997 Annual PM_{2.5} Nonattainment Area

Dear Ms. Fleming:

With this letter, the Georgia Environmental Protection Division (EPD) is submitting for approval and incorporation the proposed revisions to Georgia's State Implementation Plan (SIP) to include a plan, consistent with §175A of the Clean Air Act, to provide for maintenance of the 1997 Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) in the Atlanta area. This submittal also serves as a request that the Atlanta Nonattainment Area be redesignated as an area attaining the 1997 Annual PM_{2.5} NAAQS.

On December 8, 2011, EPA published a final rule determining that the Atlanta area had attained the 1997 fine particulate matter standards. Additionally on December 8, 2011, EPA determined that the Atlanta Area had attained the 1997 annual PM_{2.5} standard prior to the April 5, 2010 attainment date. Georgia EPD withdrew its previous submittal of nonattainment planning documents for the Atlanta area in a letter to EPA dated December 29, 2011. The emissions inventory submitted with the July 6, 2010 (cover date is May 24, 2010) SIP revision to comply with the Clean Air Act requirements of §172 for nonattainment areas was not affected by the December 29, 2011 request.

The public notice for the proposed SIP revision was advertised using the EPD Air Protection Branch listserv mailing list for public notices. Also attached to this transmittal letter is EPD's response to the comments received during the public comment period.

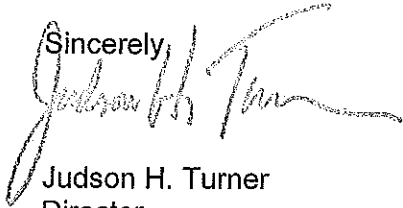
As required by the federal SIP-processing regulations, we have enclosed certifications that the required public notices were provided and that a public hearing was held. We have also enclosed the administrative and technical support checklists to satisfy the SIP submittal completeness criteria. This submittal includes one paper copy of each of the relevant documents and a compact disk with an electronic version of the documents. The electronic version is an exact duplicate of the paper copy.

Ms. Gwendolyn Keyes Fleming
Page 2

AUG 30 2012

We look forward to your review and approval of these revisions. Should you or your staff have any questions, please feel free to contact Jimmy Johnston at (404) 363-7014.

Sincerely,



Judson H. Turner
Director

JHT:JK:klc

Enclosures:

- Maintenance plan (one paper and one CD)
- Administrative checklist
- Technical checklist
- Certification of public hearing
- Copy of public notice
- Response to comments memo

Copy w/o encl:

Scott Davis, EPA Region 4
Lynorae Benjamin, EPA Region 4
James A. Capp, Branch Chief, EPD Air Protection Branch

Administrative Materials for SIP submittal dated: August 16, 2012

1. A formal letter of submittal from the Governor or his designee, requesting EPA approval of the plan or revision thereof (hereafter “the plan”).
The cover letter transmitting this proposed maintenance plan is the formal letter of submission.
2. Evidence that the State has adopted the plan in the State code or body of regulations; or issued the permit, order, consent agreement (hereafter “document”) in final form. That evidence shall include the date of adoption or final issuance as well as the effective date of the plan, if different from the adoption/issuance date.
The State promulgated Georgia Rules 391-3-1.02(2)(sss) and (uuu), which require SO₂ controls and establish minimum SO₂ control efficiencies on multiple Georgia electric generating units. These rules are a part of the subject maintenance plan.
3. Evidence that the State has the necessary legal authority under State law to adopt and implement the plan.
The Georgia Air Quality Act, Article 1: Air Quality (O.C.G.A. 12-9, et. seq.) provides the necessary legal authority under State law to adopt and implement the revisions. The Act, in its entirety, is located at <http://www.lexis-nexis.com/hottopics/gacode/> under Title 12, Chapter 9, Article 1.
4. A copy of the actual regulation, or document submitted for approval and incorporation by reference into the plan, including indication of the changes made to the existing approved plan, where applicable. The submittal shall be a copy of the official State regulation/ document signed, stamped, dated by the appropriate State official indicating that it is fully enforceable by the State. The effective date of the regulation/document shall, whenever possible, be indicated in the document itself.
Enclosed is a copy of the affected Maintenance Plan dated August 16, 2012, for approval and incorporation into the plan. This maintenance demonstration plan maintains all previously-adopted control measures contained in all previously-submitted attainment demonstration submittals.
5. Evidence that the State followed all of the procedural requirements of the State’s laws and Constitution in conducting and completing the adoption/issuance of the plan and compilation of public comments and the State’s response thereto.
The procedural requirements associated with this plan and public comment period are included in the submittal to EPA.
6. Evidence that public notice was given of the proposed change consistent with procedures approved by EPA, including the date of publication of such notice and Certification that public hearings(s) were held in accordance with the information provided in the public notice and the State’s laws and constitution, if applicable.
Documentation for the public notice (posted May 31, 2012), hearing (held July 2, 2012) and comment requirements is included in the submittal to EPA.

Technical Support for SIP Submittal dated: August 16, 2012

1. Identification of all regulated pollutants affected by the plan.
The proposed Maintenance Plan covers emissions of primary PM_{2.5} and of SO₂ and NO_x, which are PM_{2.5} precursors.
2. Identification of the locations of affected sources including the EPA attainment/non-attainment designation of the locations and the status of the attainment plan for the affected areas(s).
The Maintenance Plan is applicable to the Atlanta, Georgia, Annual PM_{2.5} Nonattainment Area in Georgia.
3. Quantification of the changes in plan allowable emissions from the affected sources; estimates of changes in current actual emissions from affected sources or, where appropriate, quantification of changes in actual emissions from affected sources through calculations of the differences between certain baseline levels and allowable emissions anticipated as a result of the revision.
Refer to the maintenance plan.
4. The State's demonstration that the national ambient air quality standards, prevention of significant deterioration increments, reasonable further progress demonstration, and visibility, as applicable, are protected if the plan is approved and implemented. For all requests to redesignate an area to attainment for a national primary ambient air quality standard, under section 107 of the Act, a revision must be submitted to provide for the maintenance of the national primary ambient air quality standards for at least 10 years as required by Section 175A of the Act.
The NAAQS will be protected through 2024 if this revision is approved and implemented.
5. Modeling information required to support the proposed revision, including input data, output data, models used, justification of model selections, ambient monitoring data used, meteorological data used, justification for use of offsite data (where used), modes of models used, assumptions, and other information relevant to the determination of adequacy of the modeling analysis.
Refer to the maintenance plan.
6. Evidence, where necessary, that emission limitations are based on continuous emission reduction technology.
The State and Federal control measures for point sources, onroad mobile sources, and nonroad mobile sources that are documented in Section 2 of the maintenance plan are all based on continuous emission reduction technology.

Atlanta PM2.5 Nonattainment Area – Redesignation Request and Maintenance Plan

7. Evidence that the plan contains emission limitations, work practice standards and recordkeeping/reporting requirements, where necessary, to ensure emission levels.
Section 2 of the maintenance plan documents Federal and State measures that have contributed to permanent and enforceable emissions reductions in the Atlanta Area and that have resulted in attainment of the annual PM2.5 standard. Section 3 of the maintenance plan demonstrates that, with the Federal and State measures in place, emission levels will be kept at levels sufficient to maintain attainment of the standard through the year 2024.
8. Compliance/enforcement strategies, including how compliance will be determined in practice.
Enforcement will be carried out as described in the State/EPA Enforcement Agreement.
9. Special economic and technological justifications required by any applicable EPA policies, or an explanation of why such justifications are not necessary.
No special economic or technological justifications are required for this proposed Maintenance Plan.

