

**Georgia Department of Natural Resources**

**Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334

Judson H. Turner, Director

(404) 656-4713

**FEB 06 2015**

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

RE: Section 182(a)(1) Emission Inventory SIP Requirement  
Section 182(a)(2)(C) Permit Program Requirement  
Section 182(a)(3)(B) Emission Statements Requirement

Dear Ms. Toney:

With this letter, the Georgia Environmental Protection Division (EPD) is submitting for approval and incorporation the proposed revision to Georgia's State Implementation Plan (SIP) to include an emission inventory, consistent with §182(a)(1) of the Clean Air Act (the Act), for the 15-county Atlanta 8-hour Ozone Nonattainment Area for 2008 8-hour Ozone National Ambient Air Quality Standard (NAAQS) published as a final rule in the federal register by EPA on March 26, 2008 [73 FR 16436]. EPD is also submitting certification that existing requirements satisfy the Permit Program and Emission Statements requirements required by §182(a)(2)(C) and §182(a)(3)(B), respectively.

§182(a)(1) of the Act requires States to submit a "comprehensive, accurate, current inventory from all sources, as described in §172(c)(3) for the relevant pollutants for the area, in accordance with guidance provided by the Administrator." §172(c)(3) describes such a plan to have provisions that "shall include a comprehensive, accurate, current inventory of actual emissions from all sources of the relevant pollutant or pollutants in such area, including such periodic revisions as the Administrator may determine necessary to assure that the requirements of this part are met."

The attached inventory has been prepared consistent with 78 FR 34178, "Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements: Proposed Rule," and 40 Code of Federal Regulations (CFR) Subpart A (51.15).

§182(a)(2)(C) of the Act requires States to submit a revision that includes each of the following:

- (i) Provisions to require permits, in accordance with sections 172(c)(5) and 173 of this title, for the construction and operation of each new or modified major stationary source (with respect to ozone) to be located in the area.
- (ii) Provisions to correct requirements in (or add requirements to) the plan concerning permit programs as were required under section 172(b)(6) of this title (as in effect immediately before November 15, 1990), as interpreted in regulations of the Administrator promulgated as of November 15, 1990.

EPD certifies that existing State of Georgia Air Quality Control rule 391-3-1-.03(8) exceeds the requirements of section 182 (a)(2)(C)(i) for the 15-county Atlanta 8-hour Ozone Nonattainment Area for 2008 8-hour Ozone National Ambient Air Quality Standard (NAAQS). No corrections to this rule are needed to meet the requirements of section 182(a)(2)(C)(ii). Section 182(a)(3)(B) of the Act requires areas classified as Marginal and above to include in their SIP a requirement for stationary sources of nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC) to provide the state with a statement showing actual emissions of NO<sub>x</sub> and VOC. EPD certifies that existing State of Georgia Air Quality Control rule 391-3-1-.02(6)(a)4. meets the requirements of section 182(a)(3)(B) for the 15-county Atlanta 8-hour Ozone Nonattainment Area for 2008 8-hour Ozone National Ambient Air Quality Standard (NAAQS).

As required by the federal SIP-processing regulations, we have enclosed certifications that the required public notices were provided and that public hearings were held. Written public comments were received via e-mail from GreenLaw, on behalf of the Sierra Club, that were addressed in the attached document titled "Responses to Comments Received on the Proposed SIP Revision for the 15-county Atlanta Nonattainment Area Emissions Inventory for the 2008 8-Hour Ozone NAAQS". No verbal public comments were received at the public hearing. EPA submitted one comment asking to "clarify the total emissions on page 11, tables 4, 5 and 6. It appears the Point EGU emissions were not included in the calculations". Tables 4, 5, and 6 on page 11 were updated to include Point EGU emissions that were inadvertently left off. In addition, Column J in the Appendix F Excel spreadsheet (Appendix\_F\_Emission\_Summary.xls) was updated to include Point EGU emissions that were inadvertently left off.

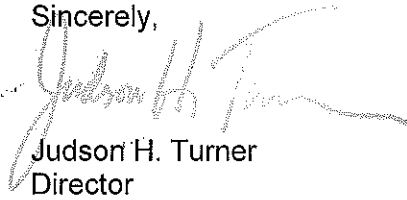
We have also enclosed the administrative materials and technical support to satisfy the SIP submittal completeness criteria checklist. This submittal includes one paper copy of the relevant document and a compact disk with an electronic version of the document. The electronic version is an exact duplicate of the paper copy with the following exceptions. Per Attachment A of Janet McCabe's April 6, 2011, memo pertaining to consistency of SIP administrative requirements, the following portions of the submittal are provided in the electronic copy only:

- Appendix A: Annual and Summer Day 2011 Emission Calculations for the 15 Atlanta Nonattainment Counties
- Appendix E: Hartsfield-Jackson Atlanta International Airport: Documentation for the CY 2011 Criteria Air Pollutant Emission Inventory
- Appendix F: Emission Summaries
- Appendix G: Georgia QAPP Documents
- Appendix H: SESARM Documents
- Appendix I: Emission Inventory Technical Support Documents

Paper copies of these large data files are not provided in order to relieve unnecessary paper burden.

One copy of this submittal will be sent to the EPA Region 4 associates noted below. We look forward to your review and approval of these revisions. Should you or your staff have any questions, please feel free to contact James Boylan at (404) 363-7014.

Sincerely,



Judson H. Turner  
Director

JHT:EM

c: Scott Davis, EPA Region 4  
Lynorae Benjamin, EPA Region 4  
Keith Bentley, Branch Chief, EPD Air Protection Branch

Enclosures: - Memorandum  
- Administrative Checklist  
- Technical Checklist  
- Certification of Public Hearing  
- Copy of Public Notice