

Georgia Department of Natural Resources

Environmental Protection Division

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Chris Clark, Commissioner

Carol A. Couch, Ph.D., Director

October 21, 2009

A. Stanley Meiburg
Acting Regional Administrator
U.S. EPA, Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Re: Certification of 110(a) Infrastructure Elements for the 2006 PM 2.5 NAAQS

Dear Mr. Meiburg:

With this letter, the Georgia Environmental Protection Division (EPD) is certifying that Georgia's current State Implementation Plan (SIP) contains the Section 110(a) elements of the Clean Air Act (CAA) that meets the requirements of the PM 2.5 National Ambient Air Quality Standards (NAAQS) as revised in 2006.

Section 110(a)(1) of the CAA requires states to submit plans to provide for the implementation, maintenance, and enforcement of any new or revised NAAQS. In addition, states are required to include in these SIPs specific infrastructure elements that provide assurances that the State will have the resources and authorities to establish the basic programs to implement, maintain, and enforce the new or revised standards. The specific elements of Section 110(a)(2) are listed below:

- Enforceable Emission Limitations and Other Control Measures [§110(a)(2)(A)]
- Air Quality Monitoring, Compilation, Data Analysis, and Reporting [§110(a)(2)(B)]
- Enforcement and Stationary Source Permitting [§110(a)(2)(C)]
- Interstate Transport [§110(a)(2)(D)]
- Resources, Conflict of Interest, and Emergency Backstop [§110(a)(2)(E)]
- Stationary Source Emissions Monitoring and Reporting [§110(a)(2)(F)]
- Emergency Powers and Contingency Plans [§110(a)(2)(G)]
- SIP Revision for Revised Air Quality Standards or New Attainment Methods [§110(a)(2)(H)]
- SIP Revisions for New Nonattainment Areas [§110(a)(2)(I)]
- Consultation and Public Notification [§110(a)(2)(J)]
- Air Quality Modeling and Reporting [§110(a)(2)(K)]
- Major Stationary Source Permitting Fees [§110(a)(2)(L)]
- Consultation with Local Entities [§110(a)(2)(M)]

Mr. A. Stanley Meiburg
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The attachment contains details of each of these requirements as found in the SIP.

Georgia's current SIP and all subsequent revisions affected by this certification as detailed in the attachment have been prepared in accordance with 40 CFR 51 and have met all applicable state and federal public notice, hearing, and comment requirements.

Should you or your staff have any questions, please feel free to contact Jimmy Johnston at 404-363-7014.

Sincerely,



Carol A. Couch
Director

CAC:JK:klc

c: Dick Schutt (with enclosure)
EPA Region 4

James Capp (w/out enclosure)
EPD, Air Protection Branch

Enclosure

**A Certification That
Georgia's State Implementation Plan
Meets The Requirements of
Clean Air Act Section 110(a)(2)-Infrastructure
Elements of the 2006 PM2.5
National Ambient Air Quality Standard**



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch

October 2009

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1.0 Introduction

A revised NAAQS for fine particulate matter (PM_{2.5}) was promulgated by EPA on October 17, 2006. This rule revised the 24-hour PM_{2.5} NAAQS and established a primary ambient air quality standard of 35 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and a secondary standard equal to the primary standard.

States must certify that their State Implementation Plans (SIPs) for areas designated as nonattainment for any NAAQS address the elements required by 110(a) of the Clean Air Act. SIPs must provide for attainment of the NAAQS as expeditiously as practicable, but not later than five years from the date of nonattainment designation. States are also required that all SIPs adopted and submitted to EPA contain "infrastructure" elements to address the requirements of sections 110(a)(1) and (2) of the Clean Air Act within three years after the promulgation of a new or revised NAAQS. These "infrastructure elements" provide assurances of State resources and authorities, and establish the basic State programs, to implement, maintain, and enforce new or revised standards.

The basic infrastructure requirements of section 110(a)(2) are listed on the following pages. The elements of §110(a)(2) are listed below.

- Enforceable Emission Limitations and Other Control Measures (§110(a)(2)(A))
- Air Quality Monitoring, Compilation, Data Analysis, and Reporting (§110(a)(2)(B))
- Enforcement and Stationary Source Permitting (§110(a)(2)(C))
- Interstate Transport (§110(a)(2)(D))
- Resources, Conflict of Interest, and Emergency Backstop (§110(a)(2)(E))
- Stationary Source Emissions Monitoring and Reporting (§110(a)(2)(F))
- Emergency Powers and Contingency Plans (§110(a)(2)(G))
- SIP Revision for Revised Air Quality Standards or New Attainment Methods (§110(a)(2)(H))
- SIP Revisions for New Nonattainment Areas (§110(a)(2)(I))
- Consultation and Public Notification (§110(a)(2)(J))
- Air Quality Modeling and Reporting (§110(a)(2)(K))
- Major Stationary Source Permitting Fees (§110(a)(2)(L))
- Consultation with Local Entities (§110(a)(2)(M))

Most of these elements are addressed in the comprehensive §110(a)(2) SIP submitted by the state of Georgia in response to the CAA of 1970 and approved by U.S. EPA as noted in 40 CFR Parts 52 Subpart L. This submittal continues to affirm Georgia-EPD's commitment to comply with §110(a)(2) requirements and incorporated by reference into this submittal.

The purpose of this document is to examine Georgia's State Implementation Plan (SIP) and determine if all necessary implementation, maintenance, and enforcement measures for the 2006 PM_{2.5} National Ambient Air Quality Standard (NAAQS) are in place.

2.0 Georgia's Approach

Section 110(a)(2) of the Clean Air Act Amendments of 1990 provides a detailed listing of various requirements for Georgia's SIP regarding the NAAQS. Below, each subparagraph from (A) through (M) is broken down, with various provisions supporting the requirements.

§110(a)(2) of the Clean Air Act (Subparagraphs A-M) EPA and Georgia Requirements

(A) EPA Requirement:

Include enforceable emission limitations and other control measures, means, or techniques (including economic incentives such as fees, marketable permits, and auctions of emissions rights), as well as schedules and timetables for compliance.

Georgia Requirements

- Georgia Rules for Air Quality 391-3-1-.01 – “Definitions. Amended”
 - Georgia Rules for Air Quality 391-3-1-.02 – “Provisions. Amended”; and
 - Georgia Rules for Air Quality 391-3-1-.03 – “Permits. Amended”.
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(B) EPA Requirement – Air Quality Monitoring, Compilation, Data Analysis, and Reporting:

Provide for establishment and operation of devices, methods, systems, and procedures to: (i) monitor, compile, and analyze data on ambient air quality, and (ii) make such data available to EPA.

Georgia Requirement:

As early as 1957, the state of Georgia has monitored air pollutants. Prior to the CAA of 1970, the state health department conducted air monitoring. In the early 1970's the Georgia EPD assumed responsibilities for ambient air monitoring to facilitate the identification and control of air contaminants in Georgia. Georgia currently collects ambient air quality monitoring data from a network of monitors located throughout the State sited and operated in accordance with 40 CFR 50 and 40 CFR 58.

Georgia EPD produces an annual ambient monitoring network plan and periodic network assessment in accordance with 40 CFR 58.10. The purpose of the annual

ambient monitoring network plan is two-fold. First, the plan confirms that the network continues to meet the State and Local Air Monitoring Stations (SLAMS) criteria established by federal regulations, and that the information in the state and federal monitoring records properly classify each monitoring station. Second, the plan serves as a directory of existing State and Local Air Monitoring Stations (SLAMS), Photochemical Assessment Monitoring Stations (PAMS), Speciation Trends Network (STN) and Supplemental Speciation sites, National Air Toxics Trends Station (NATTS), Special Purpose Monitoring (SPM), Georgia Air Toxics Network, Acid Rain sites, and the meteorological parameters performed at each location.

- Georgia's authority to monitor ambient air quality is found in Georgia Air Quality Article 1: Air Quality O.C.G.A. Section 12-9, et seq.
- Performance Partnership Agreement (PPA) between EPA and the State of Georgia establish the obligation to operate an ambient monitoring network that complies with applicable federal regulation(s).
- No specific statutory or regulatory authority is necessary to authorize data analysis or the submission of such data to EPA. Federal grant requirements establish the obligation to provide data to EPA.
- Georgia has and will continue to submit data to EPA's Air Quality System.

(C) EPA Requirement – Enforcement and Stationary Source Permits:

Include a program to provide for enforcement of measures in (A), and regulation of the modification and construction of any stationary source within the areas covered by the plan as necessary to assure that NAAQS are achieved, including a permit program as required in parts C and D.

Georgia Requirement - Enforcement: Georgia EPD's Enforcement Program covers mobile and stationary sources, consumer products, and fuels.

- Georgia's enforcement authority is found in Georgia Air Quality Article 1: Air Quality O.C.G.A. Section 12-9, et seq.
- Memorandum of Agreement between Georgia EPD and the U.S. EPA.
- Performance Partnership Agreement.
- Georgia Rule 391-3-1-.07 – "Inspections and Investigations. Amended"
- Georgia Rule 391-3-1-.09 – "Enforcement. Amended"

Georgia Requirement – Stationary Source Permitting:

- Georgia Air Quality Article 1: Air Quality O.C.G.A. Section 12-9, et seq.
 - Georgia Rules for Air Quality 391-3-1-.02. - “Provisions. Amended” including:
 - PSD requirements under Georgia Rules for Air Quality 391-3-1-.02(7).
 - Georgia Rules for Air Quality 391-3-1-.03. – “Permits. Amended” including:
 - New Source Review requirements under Georgia Rules for Air Quality 391-3-1-.03(8).
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(D) EPA Requirement – Interstate Transport:

- (i) Contain adequate provisions prohibiting any source or other type of emissions activity from emitting any air pollutant in amounts which will:
 - (1) contribute significantly to nonattainment in, or interfere with maintenance by, any other State with respect to any such national primary or secondary ambient air quality standard.

Georgia Requirement:

- Georgia Air Quality Act 12-9-5(b)(10) states:

(b) In the performance of its duties, the Board of Natural Resources shall have an may exercise the power to:

(1) Establish, review, or modify emission limitations, emission control standards, or control measures for stationary sources or facilities in areas of the state where such sources or facilities significantly contribute to nonattainment of an ambient air quality standard or significantly contribute to a significant deterioration of air quality in the state, an area of the state, or another state; [emphasis added] provided, however, that no requirement under this paragraph shall be less stringent than the requirements for such source or facility under this article and the rules and regulations promulgated pursuant to this article;

- Permitting requirements under Georgia Rule 391-3-1-.03 and Nonattainment New Source Review regulations under Georgia Rule 391-3-1-.03(8).

- Georgia met the “significant contribution” and “interfere with maintenance” portions of its §110(a)(2)(D) obligation for the 1997 ozone and PM2.5 SIPs by adoption of the Clean Air Interstate Rule. Georgia Rules 391-3-1-.02(12) and 391-3-1-.02(13) implement the federal Clean Air Interstate Rule (CAIR). CAIR was remanded to EPA in 2008 to address outstanding issues regarding significant contributions to nonattainment and interference with maintenance, and upon promulgation of a revised CAIR, Georgia will adopt any required SIP revision to address Georgia’s obligation under §110(a)(2)(D).
- Georgia Rule 391-3-1-.02(2)(sss) – Multipollutant Control for Electric Utility Steam Generating Units”
- Georgia Rule 391-3-1-.02(2)(uuu) – “SO₂ Emissions from Electric Utility Steam Generating Units”

EPA Requirement:

- (i) Contain adequate provisions prohibiting any source or other type of emissions activity from emitting any air pollutant in amounts which will:
 - (II) interfere with measures required to be included in the applicable implementation plan for any other State under part C to prevent significant deterioration of air quality or to protect visibility.

Georgia Requirement:

- Major sources in Georgia are currently subject to Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) permitting programs that implement the 8-hour ozone standard. On May 16, 2008, EPA promulgated a rule¹ establishing PSD and NNSR requirements for PM2.5 and precursors (SO₂ and NO_x). Georgia must adopt the revised NNSR regulations into the SIP no later than three years after the rule date (May 16, 2011). During the interim period, Georgia is required to implement a transitional NNSR permitting program for PM2.5 pursuant to 40 CFR §52.24(k) and Appendix S until the existing SIP is revised to meet the new PM2.5 requirements. Georgia Rule 391-3-1-.02(7) implements PSD requirements. Georgia must adopt the revised PSD regulations into the SIP no later than three years after the rule date (May 16, 2011). During the SIP development period, major sources in Georgia are subject to a PSD permitting program implemented in accordance with EPA’s interim guidance calling for use of PM10 as a surrogate for PM2.5.

¹ Federal Register/Vol. 73, No. 96/Friday, May 16, 2008/ pp 28321-28350.

- Georgia is required to develop and implement a Regional Haze State Implementation Plan to protect visibility. Georgia will submit a Regional Haze SIP in 2009. In addition, Georgia is developing and implementing a PM2.5 SIP (to be submitted in 2009) that will assist with reducing visibility reducing pollutants.

EPA Requirement:

- (ii) Insure compliance with the applicable requirements of sections 126 and 115 of the Clean Air Act (interstate and international pollution abatement).

Georgia Requirement:

- Georgia Air Quality Article 1: Air Quality O.C.G.A. Section 12-9, et seq.
- PSD regulation under Georgia Rule for Air Quality 391-3-1-.02(7).
- Permitting regulations under Georgia Rule for Air Quality 391-3-1-.03.
- In addition, nothing in Georgia's statutory or regulatory authority prohibits or otherwise interferes with Georgia's ability to exercise sections 126 and 115 of the CAA.

(E) EPA Requirement – Resources, Conflict of Interest, and Emergency Backstop:

Provide:

- (i) necessary assurances that the State will have adequate personnel, funding, and authority under State law to carry out such implementation plan (and is not prohibited by any provision of Federal or State law from carrying out such plan).

Georgia Requirement:

- This is accomplished through the CAA section 105 grant process, Georgia Air Quality Act Article 1: Air Quality O.C.G.A. 12-9-10, and Georgia Rule for Air Quality 391-3-1-.03(9) [Georgia Air Permit Fee System].

EPA Requirement:

- (ii) Requirements that the State comply with the requirements respecting State boards under section 128 of the Clean Air Act.

Georgia Requirement:

- Georgia's authority is found in Georgia Air Quality Article 1: Air Quality O.C.G.A. Section 12-9, et seq.

EPA Requirement:

- (iii) Necessary assurance that, where the State has relied on a local or regional government, agency, or instrumentality for the implementation of any plan provision, the State has responsibility for ensuring adequate of implementation of such plan provision.

Georgia Requirement:

- Georgia does not rely on localities for specific SIP implementation.

(F) EPA Requirement – Stationary Source Emissions Monitoring and Reporting:

Require, as may be prescribed by EPA:

- (i) installation, maintenance, and replacement of equipment, and implementation of other necessary steps, by owners or operators of stationary sources to monitor emissions.
- (ii) Periodic reports on the nature and amounts of emissions and emissions-related data.
- (iii) Correlation of such reports by the State agency with any emission limitations or standards established pursuant to CAA, which reports shall be available at reasonable times for public inspection.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
- Georgia Rule for Air Quality 391-3-1-.02(3) – “Sampling”.
- Georgia Rule for Air Quality 391-3-1-.02(6) – “Source Monitoring”.
- Georgia Rule for Air Quality 391-3-1-.02(11) – “Compliance Assurance Monitoring.”
- Georgia Rule for Air Quality 391-3-1-.03 – “Permits. Amended”.

(G) EPA Requirement – Emergency Powers and Contingency Plans:

Provide for authority comparable to that in §303 and adequate contingency plans to implement such authority. Section 303 provides legal authority to the U.S. EPA to halt the emission of air pollutants causing or contributing to injury to public or welfare. U.S. EPA is authorized to either bring a lawsuit in federal court or, if such civil action cannot assure prompt protection of public health or welfare, to issue such orders as may be necessary to protect public health or welfare or the environment.

The requirement for states to provide adequate contingency plans to implement such authority is intended to establish emergency episode plans for responding to elevated pollutant levels in urban areas. Emergency episode plans are required in areas that record ambient pollutant concentrations in excess of threshold levels specified in 40 CFR Part 51.150.

Background: Section 303 of the CAA authorizes the Administrator to take certain emergency actions if pollution levels in an area constitute “an imminent and substantial endangerment to public health or welfare, or the environment.” Section 110(a)(2)(G) of the CAA requires that SIPs must provide for the authority comparable to that in section 303, and must include adequate contingency plans to implement such authority. Pursuant to these provisions, EPA promulgated 40 CFR 51.16 (36 FR 24002, November 21, 1971), which established “significant harm levels” for five criteria pollutants – SO₂, inhalable particulate matter (PM₁₀), NO₂, CO, and ozone. Part 51.16 was eventually restructured as subpart H and appendix L of part 51 (51 FR 40668, November 7, 1986). The requirement to submit an emergency plan for SO₂, PM₁₀, NO₂, CO, and ozone is based on a priority classification scheme under 40 CFR Part 51 Subpart H. EPA has not yet proposed a PM_{2.5} classification scheme under 40 CFR Part 51 subparts H and/or L.

For the 1997 PM_{2.5} NAAQS – EPA has not yet proposed a PM_{2.5} classification scheme under 40 CFR Part 51 subparts H and/or L. EPA Region 4 informed Georgia EPD in September 2008 that EPA Headquarters was considering an ambient concentration threshold of 140.5 µg/m³ on a 24-hour basis as the threshold for requiring the development of an emergency episode plan for PM_{2.5} (i.e., regions in the state would be classified as Priority III if such an ambient threshold was not exceeded during the most recent three years worth of ambient data)². Based on such criteria, air quality control regions in Georgia would be classified as Priority III (based on calendar years 2005, 2006, and 2007) if EPA proposed and promulgated such an ambient concentration classification scheme.

² A PM_{2.5} ambient concentration of 140.5 µg/m³ on a 24-hour basis would correspond to an AQI Category of “Unhealthy” or Code Red; however, the agency issued a paper for discussion on February 12, 2007 that addressed EPA’s “initial thoughts about possible revisions to the Air Quality Index (AQI) and Significant Harm Level (SHL) for PM_{2.5}”.

This classification would exempt Georgia EPD from adopting an Emergency Episode Plan for PM2.5 and Georgia EPD's SIP would fulfill the CAA section 110(a)(2)(G) requirements for PM2.5 (1997 NAAQS). EPA issued a completeness finding in the **Federal Register** on October 22, 2008 as it related to infrastructure elements for the 1997 PM2.5 NAAQS. EPA determined that Georgia had made a complete SIP submission addressing §§110(a)(1) and (2) requirements as of the applicable date [e.g., including §§110(a)(2)(G)].

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
- Georgia Rule for Air Quality 391-3-1-.04 – “Air Pollution Episodes.”
- January 1972 SIP: “Implementation Plan for Attainment of State and National Ambient Air Standards” – Air Quality Control Branch, Georgia Department of Public Health (primary pages are 169-266).
- For the 2006 PM2.5 NAAQS - EPA has not yet proposed a PM2.5 classification scheme under 40 CFR Part 51 subparts H and/or L. Georgia EPD is unaware of what ambient concentration threshold on a 24-hour basis would require the development of an emergency episode plan for the 2006 PM2.5 NAAQS. With that in mind Georgia EPD chose to use an ambient concentration threshold of 140.5 $\mu\text{g}/\text{m}^3$ on a 24-hour basis as the threshold for requiring the development of an emergency episode plan for PM2.5 (as for the 1997 NAAQS). Based on such criteria, air quality control regions in Georgia would be classified as Priority III (based on calendar years 2006, 2007, and 2008) if EPA proposed and promulgated such an ambient concentration classification scheme. This classification would exempt Georgia EPD from adopting an Emergency Episode Plan for PM2.5 and Georgia EPD's SIP would fulfill the CAA section 110(a)(2)(G) requirements for PM2.5.

(H) **EPA Requirement – SIP Revisions for Revised Air Quality Standards or New Attainment Methods:**

Provide for revision of such plan:

- (i) from time to time as necessary to take account of revisions of such national primary or secondary ambient air quality standard or the availability of improved or more expeditious methods of attaining such standard.

- (ii) except as provided in (3)(C), whenever EPA finds on the basis of information available to EPA that the plan is substantially inadequate to attain the NAAQS which it implements or to otherwise comply with any additional CAA requirements.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
 - Performance Partnership Agreement
 - Georgia EPD commits to submit SIP revisions whenever revised air quality standards are promulgated by U.S. EPA.
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(I) EPA Requirement – SIP Revisions for New Nonattainment Areas:

In the case of a plan or plan revision for an area designated as a nonattainment area, meet the applicable requirements of part D (relating to nonattainment areas). States are to submit SIP revisions for newly designated nonattainment areas to meet the requirements of Part D – Plan Requirements for Nonattainment Areas under Clean Air Act Title I – Air Pollution Prevention and Control. Part D of the Clean Air Act specifies both general requirements for all SIPs and specific requirements for different criteria pollutants.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
 - Georgia Rule for Air Quality 391-3-1-.02 – “Provisions. Amended”
 - Georgia Rule for Air Quality 391-3-1-.03 – “Permits. Amended”
 - Georgia EPD commits to submit SIP revisions whenever areas of the state are newly designated nonattainment for any federal ambient air quality standard. Note that no area of the state has been designated nonattainment for the 2006 PM_{2.5} National Ambient Air Quality Standard.
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(J) EPA Requirement – Consultation and Public Notification:

Meet applicable requirements of §121 (consultation). Section 121 requires that states provide a satisfactory process of consultation with general purpose local

governments, designated organizations of elected officials of local governments, and any affected federal land manager in carrying out CAA requirements.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
- Georgia Administrative Procedures Act (O.C.G.A. §50-13-4)
- Georgia Rule 391-3-1-.02(7) as it relates to Class I areas.
- Transportation Conformity SIP Revision dated April 7, 2000 and approved in 65 FR 18245. This SIP takes the form of a Memorandum of Agreement (MOA) between the agencies involved including but not limited to the Atlanta Regional Commission, Georgia Department of Transportation, the Metropolitan Atlanta Rapid Transit Authority, and Georgia EPD.
- Georgia EPD commits to maintaining a process of consultation with parties designated under Section 121.

EPA Requirement:

Meet applicable requirements of §127 (public notification). Section 127 requires the states to provide measures which will be effective to notify the public on a regular basis of instances or areas in which any air quality standard is exceeded during the preceding calendar year, to advise the public of the health hazards associated with such pollution, and to enhance public awareness of measures that can be taken to prevent such standards from being exceeded.

- Georgia EPD forecasts daily ozone and particle levels and issues e-mails to the public, businesses and the media.
- Daily air quality forecasts may be disseminated to the public in Atlanta via electronic Georgia DOT billboards.
- The non-profit organization “Clean Air Campaign” disseminates statewide air quality information as well as ways to reduce air pollution.
- In addition, air quality calendars display past air quality information and dynamic graphs provide summaries of unhealthy air quality experienced throughout the region. This feature of the web site allows the public to monitor long-term air quality and see how one year compares to previous years.

- Georgia EPD commits to maintaining a public information and education program that satisfies the requirements of Section 127.

EPA Requirement:

Meet applicable requirements of Part C (PSD and visibility protection).

Georgia Requirement:

- Georgia Rule for Air Quality 391-3-1-.02(1) – “General Requirements”.
- Georgia Rule for Air Quality 391-3-1-.02(7) – “Prevention of Significant Deterioration”.
- Georgia EPD intends to comply with the recently promulgated NSR rules for PM2.5. Per that rule, for PSD, Georgia EPD has up to 3 years to incorporate such changes, until which time Georgia EPD uses PM10 as a surrogate. For Nonattainment NSR, the federal rule requires that Georgia EPD use PM2.5 effective July 15, 2008 under the authority of 40 CFR Part 51 Appendix S. The federal rule does not allow the use of PM10 as a surrogate for PM2.5 in nonattainment NSR after July 15, 2008.

(K) EPA Requirement – Air Quality Modeling and Reporting:

- (i) Provide for performance of air quality modeling as EPA may prescribe for the purpose of predicting the effect on ambient air quality of any emissions of any air pollutant for which EPA has established a NAAQS.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
- Inherent in the obligation to meet the NAAQS is the authority for Georgia EPD to perform modeling as required under the CAA to demonstrate attainment.

EPA Requirement:

- (ii) Provide for the submission, upon request, of data related to such air quality modeling to EPA.

Georgia Requirement:

- Air quality modeling data is submitted as part of Georgia's relevant SIP submissions and through federal grant commitments.
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(L) EPA Requirement – Major Stationary Source Permitting Fees:

Require owner of a major stationary source to pay, as a condition of any permit required under CAA, a fee sufficient to cover: (i) reasonable cost of reviewing and acting upon any permit application, and (ii) if the owner receives a permit, the reasonable costs of implementing and enforcing the terms and conditions of the permit (not including court costs or costs associated with enforcement), until fee requirement is superseded by EPA approval of a Title V fee program.

Georgia Requirement:

- Georgia Rule for Air Quality 391-3-1-.03(9) – “Permit Fees.” This rule incorporates the EPA approved Title V fee program.
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(M) EPA Requirement – Consultation with Local Entities:

Provide for consultation and participation by local political subdivisions affected by the plan.

Georgia Requirement:

- The Georgia Air Quality Act: Article I: Air Quality (O.C.G.A. Section 12-9, et. Seq.)
 - Transportation Conformity SIP Revision dated April 7, 2000 and approved in 65 FR 18245. This SIP takes the form of a Memorandum of Agreement (MOA) between the agencies involved including but not limited to the Atlanta Regional Commission, Georgia Department of Transportation, the Metropolitan Atlanta Rapid Transit Authority, and Georgia EPD.
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Conclusion

Based on the information provided above, Georgia EPD fully complies with the requirements of §110(a)(2)(A) through §110(a)(2)(M). Therefore, no implementation plan to correct deficiencies is needed.