

**Region 4 - Air Planning Agreement
For Fiscal Year 2019
** Final ****

Agency: Georgia Department of Natural Resources

Improving Air Quality

Goal: Goal 1: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety.

Objective: Improve Air Quality. Work with states and tribes to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.

Sub-Objective: By September 30, 2022, reduce the number of non-attainment areas to 101

Strategic Targets: • TBD

FY 2019 105 Grant Commitments:

Implement the PM_{2.5} NAAQS

1. As appropriate, address any area violating the PM_{2.5} NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office.

Response: Agree on addressing any area violating the NAAQS and providing reports to EPA upon request. Disagree on providing quarterly reports without clear and compelling reason especially when no area is violating the NAAQS.

Reporting: Not applicable in FY 2019.

Implement the 2015 8-hour Ozone NAAQS

2. As appropriate, address any area violating the ozone NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office.

Response: Agree on addressing any area violating the NAAQS and providing reports to EPA upon request. Disagree on providing standing quarterly reports without clear and compelling reason especially when no area is violating the NAAQS that is not designated nonattainment.

Reporting: Atlanta is violating the 2015 Ozone NAAQS based on 2016-2018 data and preliminary (uncertified) 2017-2019 data. On April 30, 2018, EPA designated seven counties in the Atlanta area as "marginal" nonattainment for the 2015 ozone NAAQS. No other areas in Georgia are violating the ozone NAAQS.

3. Begin development of SIP revisions to address nonattainment requirements (i.e. emissions statement, emissions inventory and nonattainment new source review) for the 2015 Ozone NAAQS for areas designated nonattainment on April 30, 2018. Submissions deadlines are outlined in EPA's Ozone Implementation Rule.

Response: Agree.

Reporting: Commitment has been met. Georgia EPD has begun development of the SIP and is on schedule to meet the submittal deadline of August 3, 2020.

Implement the Lead NAAQS

4. As appropriate, address any area violating the 2008 Lead NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office.

Response: Agree on addressing any area violating the NAAQS and providing reports to EPA upon request. Disagree on providing standing quarterly reports without clear and compelling reason.

Reporting: Not applicable in FY 2019.

Attain and Maintain the Other NAAQS

5. As appropriate, address any area violating the other NAAQS that is not designated nonattainment and provide quarterly reports on activities and accomplishments to the Regional Office.

Response: Agree on addressing any area violating the NAAQS and providing reports to EPA upon request. Disagree on providing standing quarterly reports without clear and compelling reason especially when no area is violating the SO₂, NO₂, PM₁₀, or CO NAAQS.

Reporting: The PM₁₀ site in Augusta measured one exceedance on January 25, 2017. The manual PM₁₀ sampler that recorded the exceedance operated on a 1-in-6 day sampling schedule. This one exceedance day resulted in a violating 2015-2017 design value for the site, because the PM₁₀ NAAQS design value was based on estimated exceedances due to the 1-in-6 day sampling schedule. Georgia EPD replaced the manual PM₁₀ sampler at the site with a continuous PM₁₀ sampler on October 1, 2017. Since then, there have been no exceedances. Given the long-term record of low PM₁₀ concentrations in Augusta, EPA determined that having one continuous PM₁₀ monitor in Augusta was sufficient (see Gregg Worley's January 29, 2019 email to EPD)
The lead site in Columbus measured exceedances on March 21 and April 2, 2018 which caused a violation of the lead NAAQS. The lead acid battery plant responsible for the exceedance ceased operating in March 2019.

6. In accordance with a recent SO₂ consent decree, EPA completed the second round of SO₂ designations prior to July 2, 2015, and the third round of designations prior to December 31, 2017. There is one remaining round of SO₂ designations (i.e. by 2020 for the round based on monitoring.) States are invited to submit additional recommendations and technical support to help inform these designations. If your

Agency intends to submit additional recommendations and technical support information, EPA requests that you do so by the timeframes specified for each round of designations.

Response: Agree, however the date of July 2, 2015 is incorrect. It should be changed to "...SO₂ designations prior to July 2, 2016".

Reporting: Commitment has been met.

7. For any area where modeling of actual SO₂ emissions serve as the basis for designating such area as attainment for the 2010 SO₂ NAAQS, the air agency shall submit an annual report to the EPA Regional Administrator by July 1 of each year, either as a stand-alone document made available for public inspection, or as an appendix to its Annual Monitoring Network Plan (also due on July 1 each year under 40 CFR 58.10), that documents the annual SO₂ emissions of each applicable source in each such area and provides an assessment of the cause of any emissions increase from the previous year.

Response: Agree. However, Georgia EPD submitted a request to EPA Region 4 on May 22, 2018 to remove the Georgia Power-Plant Scherer annual reporting requirement. The SO₂ DRR allows the EPA Regional Administrator to remove the annual reporting requirement if air quality modeling shows that "air quality values at all receptors in the analysis are no greater than 50 percent of the 1-hour SO₂ NAAQS" as is the case with Georgia Power-Plant Scherer.

Reporting: Commitment has been met. On June 24, 2019, Georgia EPD submitted SO₂ annual reports for Georgia Power Plant McIntosh, Georgia Power Plant Bowen, Georgia Pacific Savannah River Mill and International Paper Savannah.

NAAQS Cross Cutting

8. Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment.

Response: Agree

Reporting: Commitment has been met.

9. Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs.

Response: Agree. EPA holds back a portion of Georgia EPD's 105 allocation for direct award to SESARM and AAPCA, which provide technical project support,

and operations and meeting support for state air agencies at the regional and national levels.

Reporting: Commitment has been met.

Implement Mobile Source Programs

10. Actively participate in the transportation conformity process, which includes the following activities: consult with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participate in the interagency consultation process; and develop relationships with transportation partners.

Response: Agree

Reporting: Commitment has been met.

Implement NSR Programs

11. Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Achievable Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).

Response: Agree.

Reporting: Commitment has been met.

12. Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source of modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit.

Response: Agree.

Reporting: Commitment has been met.

Ambient Air Monitoring

13. Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year).

Response: Agree.

Reporting: Commitment has been met.

14. The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1-minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years.

Response: Agree.

Reporting: Commitment has been met.

15. The State will develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. State agencies, as applicable, will coordinate with their Local agencies in the development of this plan. The network plan is to be submitted on or before July 1 of each year incorporating any changes, real or proposed. Include in the network plan a certified evaluation of the agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse.) Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor."

Response: Agree. The phrase "Include in the network plan a certified evaluation..." should be revised to read "Include in the network plan an evaluation..."

Reporting: Commitment has been met.

16. Maintain an approved quality management plan (QMP) for the criteria pollutant network. QMPs expire every five (5) years. The QMP will be submitted at least 180 days prior to the expiration of the current QMP electronically to R4QMP@epa.gov or in hard copy to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Regional Quality Assurance Manager. QMPs must address EPA Requirements for Quality Management Plans (EPA QA/R-2, <http://www.epa.gov/quality/qs-docs/r2-final.pdf>). For additional information and guidance see <http://www.epa.gov/quality/qmps.html> .

Response: Agree, with this additional clarification. Georgia EPD's Section 105 funding is included as part of a PPG, and Georgia EPD submits a QMP on behalf of the agency. Georgia EPD will make every effort to submit the QMP to EPA Region 4 by the requested deadline (180 days prior to expiration).

Reporting: Commitment has been met.

17. For all new pollutants to be monitored and methods to be used, a quality assurance project plan (QAPP) must be submitted for approval 180 days prior to collection of environmental data. Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf).

Response: Agree, to the extent practicable, given EPA's current expectations with regard to level of detail in QAPPs. Some details of monitoring for a new pollutant are not fully worked through 180 days prior to commencing collection of data.

Reporting: The timeline for implementing ethylene oxide (EtO) sampling was extremely short, so submitting a QAPP for approval 180 days prior was not possible. EPD sought approval from EPA to begin EtO sampling before the QAPP was formally approved. EPA approved EtO sampling on September 20, 2019 (see email from Rick Gillam/Acting Chief of Air Data and Analysis Section EPA Region 4 dated September 20, 2019). EPD has an approved NATTS QAPP for VOC sampling and analysis that is largely similar to the EtO QAPP submitted.

18. Maintain an approved quality assurance project plan (QAPP) for the criteria pollutant network. QAPPs will be reviewed and submitted for approval in accordance with the following:

1. QAPPs will be reviewed annually by each agency. The review will be documented in an email to r4sesdairqa@epa.gov. The email should state the date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.
2. QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.
3. Submit standard operating procedures (SOPs) associated with the QAPPs. SOPs will be referenced during the QAPP review; however SOPs will not be reviewed or approved.

Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf)

Response: Disagree to #1. Review and approval of QAPPs is performed by EPA Region 4's Science and Ecosystem Support Division (SESD) and Georgia EPD is not in control of the timeframe in this commitment. QAPPs expire five years after EPA approves them. SESD has committed to working with each state to develop a QAPP submittal schedule. After SESD catches up on overdue QAPP approvals, Georgia EPD will make every effort to submit approvable QAPPs to SESD 180 days prior to expiration of the current, approved, QAPP. Conditional approval of a QAPP shall be interpreted by Georgia EPD as an approval
Disagree to #3. To submit all the associated SOPs with each QAPP is redundant and burdensome, and so many of our networks rely on overlapping SOPs. The SOPs in their entirety are too large to send via email and too costly to mail in hardcopy form. Georgia EPD will upload our SOPs to a Dropbox account that SESD can access electronically.

Reporting: Commitment has been met.

19. For all SLAMS and special purpose monitors (SPMs) meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM2.5. For the 8 hour ozone NAAQS, report all 4th maximum concentrations

that are at or above the level of the standard (agencies meet this commitment for monitors that have data reported to AirNow).

Response: Agree.

Reporting: Commitment has been met.

20. Comply with the requirements in 40 CFR § 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either state or local requests to exclude data unless the state is in compliance with the appropriate requirements.)

Response: Agree.

Reporting: Commitment has been met.

21. In conjunction with the AQI, agencies are encouraged to submit an air quality forecast for MSA's greater than 350,000 people to the EPA AirNow Web site. The air quality forecast should be submitted daily to the AirNow web site before 3:55 p.m. EDT. The air quality forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast; instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used.

Response: Disagree. 40 CFR 58 App. G, Section 11 clearly states that forecasting AQI is not required. Georgia EPD has committed through the SIP process to forecast Atlanta ozone from March 1 – October 31. We voluntarily forecast for ozone in Macon from March 1 – October 31, and PM2.5 in Columbus and Atlanta year-round.

Reporting: Georgia EPD did not agree to this commitment.

22. Support staff participation at the following meetings:
A. The annual Region 4 Ambient Air Monitoring WorkShop; and
B. The National Ambient Air Monitoring Conference.

Response: Agree, to the extent that state budget and travel policies allow.

Reporting: Commitment has been met.

23. SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 90 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.

Response: Agree.

Reporting: Commitment has been met.

24. As part of the QA competency demonstration submittal (Reporting Requirement 19-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents (QMPs, QAPPs, and SOPs) for the criteria pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs).

Response: Agree, with this additional clarification. Georgia EPD's Section 105 funding is included as part of a PPG, and Georgia EPD submits a QA Competency on behalf of the agency. Georgia EPD will make every effort to submit the QA Competency to EPA Region 4 by the requested deadline.

Reporting: Commitment has been met.

Address Air Toxics Problems in Communities

25. Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: Agree. We recommend changing "in July annually" to "on or before July 1" to ensure clarity in the requested deadline. Georgia EPD participates in the National Air Toxics Trends Stations Network (NATTS).

Reporting: Commitment has been met.

26. Maintain an approved quality assurance project plan (QAPP) for the air toxics network. QAPPs will be reviewed and submitted for approval in accordance with the following:

1. QAPPs will be reviewed annually by each agency. The review will be documented in an email to r4sesdairqa@epa.gov. The email should state the date of the review and whether the QAPP is adequate as written or requires changes. If revised, the QAPP will be submitted to EPA for approval within 180 days following the date of the email.
2. QAPPs expire every five (5) years and thus will be reviewed, revised and submitted to EPA for approval 180 days prior to expiration of the current QAPP.
3. Submit standard operating procedures (SOPs) associated with the QAPPs. SOPs will be referenced during the QAPP review; however SOPs will not be reviewed or approved.
4. If no monitoring is planned, respond to this comment by stating, "No air toxics monitoring will be performed."

Electronic copies may be submitted to r4sesdairqa@epa.gov and hard copies to: EPA Region 4, Science and Ecosystem Support Division, 980 College Station Road, Athens, GA 30605, Attn: Superfund and Air Section Chief. QAPPs must address EPA Requirements for Quality Assurance Project Plans (EPA QA/R5, https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf).

Response: Agree, with caveats. SESD has committed to working with each state to develop a QAPP submittal schedule. QAPPs expire five years after EPA approves them. After SESD catches up on overdue QAPP approvals, Georgia EPD will make every effort to submit approvable QAPPs to SESD

180 days prior to expiration of the current, approved, QAPP. Conditional approval of a QAPP shall be interpreted by Georgia EPD as an approval. SESD will be given electronic access to applicable SOPs when QAPPs are submitted. Georgia EPD operates a National Toxics Trends Station as part of its network.

Reporting: Commitment has been met.

27. If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality.

Response: Agree

Reporting: Commitment has been met.

28. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 120 days from the end of the quarter for all ambient air toxics monitoring data collected.

Response: Disagree. 180 days is more consistent with federal requirements than 120 days. 40 CFR 58.16(d) specifies that the VOC and carbonyl data from PAMS sites shall be reported to AQS within 6 months following the end of each quarterly reporting period. Also, the Technical Assistances Documents for the NATTS and PAMS programs specify that data should be uploaded to AQS within 180 days after the end of the quarter.

Reporting: Due to turnover in data validation staff, the 2018 data was not submitted within the 180 day deadline. New staff has been hired, SOPs updated, and staff trained. This commitment has been met for 2019 data.

29. As part of the QA competency demonstration submittal (Reporting Requirement 19-14) that your agency submits to EPA with its annual grant application package, provide a listing of all QA documents (QMPs, QAPPs, and SOPs) for the air toxics pollutants network maintained by your agency, and the date that each document was most recently revised and approved (EPA approval only required for QMPs and QAPPs).

Response: Agree, with this additional clarification. Georgia EPD's Section 105 funding is included as part of a PPG, and Georgia EPD submits a QA Competency on behalf of the agency. Georgia EPD will make every effort to submit the QA Competency to EPA Region 4 by the requested deadline.

Reporting: Commitment has been met.

30. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

Response: Agree, but we will adopt promulgated Clean Air Act Section 112, 111, and 129 rules and notify Region 4 within a reasonable time frame.

Reporting: Commitment has been met.

31. Work towards establishing the programmatic expertise to address the risk-based components of Clean Air Act sections 112, 111, and 129, by pursuing risk training when appropriate.

Response: Agree. Georgia EPD has developed the Guidelines for Ambient Impact Assessment of Toxics Air Pollutant Emissions as part of our permitting processes. The guidelines are used in the review of air quality permit applications. Permit engineers are trained on the use of the guidelines.

Reporting: Commitment has been met.

32. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and provide copies of approvals to the Region upon issuance (see 40 CFR Part 63.91(g)(1)(ii)).

Response: Agree.

Reporting: Commitment has been met.

33. Prepare and submit CAA sections 111(d) and 129 state plans and letters of certification in accordance with regulatory timeframes. In addition, collect and submit reports on progress of sections 111(d) and 129 plans annually, pursuant to 40 CFR 60.25(e) and (f).

Response: Agree but the annual progress report will be included directly in the APA Summary Report due December 31st.

Reporting: Commitment has been met. EPD sent the 2019 progress report via email to EPA on November 13, 2019 (to Kathleen Lusky of EPA Region 4)

Region 4 - Air Planning Agreement For Fiscal Year 2019

**** Final ****

Agency: Georgia Department of Natural Resources

Monitoring and Enforcement

Goal: Goal 2 – Cooperative Federalism: Rebalance the power between Washington and the states to create tangible environmental results for the American people.

Goal 3 – Rule of Law and Process: Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.

Objective: Objective 2.2 – Enhance Shared Accountability: Improve environmental protection through shared governance and enhanced collaboration with state, tribal, local, and federal partners using the full range of compliance assurance tools.

Objective 3.1 – Compliance with the Law: Timely enforce environmental laws to increase compliance rates and promote cleanup of contaminated sites through the use of all of EPA's compliance assurance tools, especially enforcement actions to address environmental violations.

Sub-Objective:

- By September 30, 2022, increase the number of grant commitments achieved by states, tribes, and local communities.
- By September 30, 2022, increase the use of alternative shared governance approaches to address state, tribal, and local community reviews.
- By September 30, 2022, reduce the average from time violation identification to correction.
- By September 30, 2022, increase environmental law compliance rate.

Strategic Targets: • TBD

FY 2019 105 Grant Commitments:

1. Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014, The Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete, accurate and timely data support of the Integrated Compliance Information System (ICIS-Air).

Response: Agree. The required minimum data requirements are batch-uploaded to ICIS-Air weekly. Georgia EPD interprets the recommended full compliance evaluation frequencies in the Compliance Monitoring Strategy (CMS) to apply to "O" operating sources only. Temporarily closed sources, sources under construction, planned sources, and permanently shut down sources are not considered part of Georgia's CMS universe. Please note that EPA's CMS Policy has since been revised on October 4, 2016.

Reporting: Commitment has been met.

2. Resolve violations of any rule for which EPA has delegated authority to the state or local agency. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014.

Response: Agree.

Reporting: Commitment has been met.

3. Inspect 25% of all NESHAP asbestos demolition/renovation projects. These projects should be selected so that all removal contractors are inspected at least once. Alternatively, lower inspection rates can be negotiated if an effective contractor certification program is in place. Lower inspection rates can also be negotiated if a non-notifier strategy is developed and implemented.

Response: Disagree. Georgia EPD returned Asbestos NESHAP inspection and enforcement responsibilities back to EPA in March 2009, with the exception of the requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

Reporting: Georgia EPD did not agree to this commitment. Georgia EPD continues to implement and enforce requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

4. Observe asbestos work practices in progress whenever possible to assess compliance. Special priority will be given to entering a project of a contractor with a work practice violation within the previous 12-month period.

Response: Disagree. Georgia EPD returned Asbestos NESHAP inspection and enforcement responsibilities back to EPA in March 2009, with the exception of the requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

Reporting: Georgia EPD did not agree to this commitment. Georgia EPD continues to implement and enforce requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

5. ACTS/NARS database is no longer available. Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal six-month period 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment.

Response: Disagree. Georgia EPD returned Asbestos NESHAP inspection and enforcement responsibilities back to EPA in March 2009, with the exception of the requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

Reporting: Georgia EPD did not agree to this commitment. Georgia EPD continues to implement and enforce requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

6. Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, protective equipment, and training as

minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits.

Response: Disagree. Georgia EPD returned Asbestos NESHAP inspection and enforcement responsibilities back to EPA in March 2009, with the exception of the requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

Georgia EPD administers inspection activities as part of an AHERA grant funded by EPA. As part of the federal inspector credentialing process, EPD inspectors must maintain health and safety training, equipment and monitoring per EPA established guidelines. Documentation of these activities is provided as per AHERA grant commitments.

Reporting: Commitment met as part of the Asbestos Hazard Emergency Response Act (AHERA) grant obligations. Georgia EPD performs AHERA inspections on behalf of EPA. Georgia EPD also continues to implement and enforce requirements contained in Title V permits for municipal solid waste landfills subject to 40 CFR Part 61 Subpart M.

7. Recommend (where appropriate) cases and provide support to the EPA Criminal Enforcement Program.

Response: Agree.

Reporting: Commitment has been met.

8. Implement the CAA section 112(r) program for affected sources. Develop a 112(r) work plan with projected priorities including risk management program audits and facility inspections. Compile end-of-year report of accomplishments.

Response: Agree.

Reporting: Commitment has been met. End-of-year report was submitted November 12, 2019, which summarizes the 112(r) program accomplishments for FFY 2019 and the work plan for FFY 2020.

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Agency: Georgia Department of Natural Resources

Cross Cutting Issues

Goal: Goals 1, 2 and 3: Deliver real results to provide Americans with clean air, land, and water; Rebalance the power between Washington and the states to create tangible environmental results for the American people; and Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law

Objective: See all objectives listed in this agreement.

Sub-Objective: See all strategic targets listed in this agreement.

Strategic Targets: • See all strategic targets listed in this agreement.

FY 2019 105 Grant Commitments:

Emission Inventories - Hazardous Air Pollutants

1. Review the National Air Toxic Assessment (NATA) results during the year the EPA Office of Air Quality Planning and Standards (OAQPS) requests it and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the 2017 National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by OAQPS. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. The state and local NEI/NATA contact in the Air Data and Analysis Section should be notified via e-mail when the 2017 submittal is made to the EIS.

Response: Agree to review NATA results. Disagree with submitting hazardous air pollutants to the EIS/NEI because not required by any rule or regulation
Note that the link to the EIS Gateway should be corrected to <https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-gateway>.

Reporting: Georgia EPD did not agree to this commitment but reviewed NATA results.

Emission Inventories - Criteria Air Pollutants

2. Develop and submit to EPA, emissions inventory information for all applicable point sources, criteria air pollutants (CAP) and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The 2017 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 15, 2019. Early submittals are recommended. Information on the EIS Gateway can be found at:

<http://www.epa.gov/ttn/chief/eis/gateway/index.html>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2017 submittal is made to the EIS.

Response: Agree. Note that the link to the EIS Gateway should be corrected to <https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-gateway>.

Reporting: Commitment has been met.

Planning

3. Submit a draft Air Planning Agreement for FY 2019 by August 1, 2018, respectively, by responding to the commitments on the internet-based draft workplan.

Response: Agree.

Reporting: Commitment has been met.

4. Participate with EPA in an end of year evaluation of performance to be completed by March 1, 2020. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:
 - A. discussions of accomplishments as measured against work plan commitments;
 - B. discussions of the cumulative effectiveness of the work performed under all work plan components;
 - C. discussions of existing and potential problem areas;
 - D. suggestions for improvement, including, where feasible, schedules for making improvements; and
 - E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations.

Response: Agree.

Reporting: This document satisfies the requirement for an annual summary report. Georgia EPD is also ready and willing to participate in any evaluation EPA requests.

Agency Expectations of EPA (optional)

5. Enter Agency's expectations of EPA (i.e., assistance needed from EPA to meet the commitments under this Air Planning Agreement).

Response: Georgia EPD commitments contained in this Air Planning Agreement are contingent upon EPA delivering 105 Grant funds in a timely manner and at funding levels comparable to FY 2018 and FY 2017.

Reporting: Not applicable.