FLORIDA DEPARTMENT OF
Environmental Protection

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December 18, 2020

Karen Hays
Branch Chief, Air Protection Branch
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, GA 30354

Subject: Reasonable Progress Analyses for the Regional Haze Second Planning Period (2028)

Dear Ms. Hays:

Under the U.S. Environmental Protection Agency's Regional Haze Rule, each state must submit a State Implementation Plan (SIP) that provides for reasonable progress towards achieving natural visibility conditions in Class I areas, including Class I areas in other states.

Florida has within its borders three Class I areas subject to the reasonable progress requirement. These Class I areas are Chassahowitzka Wilderness Area, St. Marks Wilderness Area, and Everglades National Park.

As you know, consultation between states is a requirement of the Regional Haze Rule (RHR) located at 40 CFR Part 51, Subpart P – Protection of Visibility under 40 CFR 51.308(f)(2)(ii):

> The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

To determine which sources in Georgia may be contributing to visibility impairment at Florida Class I areas, the Florida Department of Environmental Protection (Department) is following the process developed in collaboration with the Visibility Improvement State and Tribal Association of the Southeast (VISTAS) states, described below.

VISTAS initially used an Area of Influence (AOI) analysis to identify the areas and sources most likely contributing to poor visibility in Class I areas. The AOI analysis used the HYSPLIT Trajectory Model to determine the origin of the air parcels affecting visibility within each Class I area. This information was spatially combined with emissions data to determine the pollutants, sectors, and individual sources that are likely to be contributing to the visibility impairment at each Class I area. VISTAS analyzed this information to determine that the pollutants and sector

with the largest impact on visibility impairment were sulfur dioxide (SO_2) and nitrogen oxides (NO_X) from point sources.

Next, VISTAS states used the results of the AOI analysis to identify sources to "tag" for Particulate Matter Source Apportionment Technology (PSAT) modeling. PSAT modeling uses "reactive tracers" to apportion particulate matter among different sources, source categories, and regions. PSAT was implemented with the Comprehensive Air Quality Model with Extensions (CAMX) photochemical model to determine visibility impairment due to individual facilities. PSAT results showed that in 2028 the majority of anthropogenic visibility impairment at Class I areas continues to be from point source SO_2 emissions.

Using the PSAT data, VISTAS states selected for reasonable progress analysis the sources shown to have a sulfate impact or nitrate impact in one or more Class I areas that is greater than or equal to 1.00 percent of the total sulfate plus nitrate point source visibility impairment on the 20 percent most impaired days for that Class I area. The following Georgia facility meets the selection criteria for Florida Class I areas:

Facility Name	Facility ID	Contribution to Visibility Impairment, Chassahowitzka	Contribution to Visibility Impairment, St. Marks	2028 Projected SO_2 Emissions
Georgia Power Company – Plant Bowen	13015-2813011	2.36%	5.04%	10,453.4

The Department asks that Georgia include this source in the response to the reasonable progress requirement and share the results of the analysis with Florida.

The following Florida sources meet the selection criteria for Georgia Class I areas:

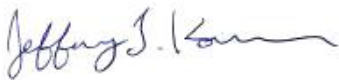| Facility Name	Facility ID	Contribution to Visibility Impairment, Okefenokee	Contribution to Visibility Impairment, Wolf Island	2028 Projected SO_2 Emissions
Nutrien – White Springs	12047-769711	2.87%	<1.00%	1,557.0
Georgia-Pacific – Foley Cellulose Perry Mill	12123-752411	2.23%	<1.00%	1,520.4
WestRock – Fernandina Beach Paper Mill	12089-753711	1.36%	2.43%	2,606.7
Jacksonville Electric Authority – Northside Generating Station	12031-640211	<1.00%	1.34%	2,150.5

Facility Name	Facility ID	Contribution to Visibility Impairment, Okefenokee	Contribution to Visibility Impairment, Wolf Island	2028 Projected SO₂ Emissions
Seminole Electric Cooperative, Inc. Generating Station	12107-2474411	3.25% (AOI)	1.77% (AOI)	3,713.4

The Department will include these sources in the response to the reasonable progress requirement and share the results of the analyses with Georgia.

For the purpose of consultation requirements of the Regional Haze Rule, the Department requests that Georgia provide a written response. If you have any questions, please call or email Hastings Read at 850-717-9017 (Hastings.Read@floridadep.gov) or Ashley Kung at 850-717-9041 (Ashley.Kung@floridadep.gov).

Sincerely,

Jeff Koerner, Director
Division of Air Resource Management