



United States
Department of
Agriculture

Forest
Service

Chattahoochee-Oconee National Forest
Supervisor's Office

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File Code: 2580
Date: June 17, 2022

Ms. Anna Aponte, Planning & Regulatory Development Unit
Unit Manager
Planning & Regulatory Development Unit, Air Protection Branch
4244 International Parkway, Suite #120
Atlanta, GA 30354

Dear Ms. Aponte:

On April 22, 2022, the State of Georgia submitted a draft Regional Haze State Implementation Plan describing your proposal to continue improving air quality by reducing regional haze impacts at mandatory Class I areas across the region. We appreciate the opportunity to work closely with your State through the initial evaluation, development, and subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at our Class I areas.

This letter acknowledges that the U.S. Department of Agriculture, U.S. Forest Service, has received and conducted a substantive review of your proposed Regional Haze State Implementation Plan. This review satisfies your requirements under the code of federal regulations 40 (C.F.R). § 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination about the document's completeness, and therefore, only the EPA has the authority to approve the document.

We have attached comments to this letter based on our review. We look forward to your response required by 40 C.F.R. § 51.308(i)(3). For further information, please contact Melanie Pitrolo at 470-882-9854 or Bret Anderson (bret.a.anderson@usda.gov).

Again, we appreciate the opportunity to work closely with the State of Georgia. The Forest Service compliments you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

X

Signed by: EDWARD HUNTER

EDWARD HUNTER, JR
Forest Supervisor

Enclosure (1)

cc: Melanie Pitrolo, Margrett Boley



Enclosure

USDA Forest Service Technical Comments on Georgia Environmental Protection Division (EPD) Draft Regional Haze (RH) State Implementation Plan (SIP)

The USDA Forest Service recognizes the significant emission reductions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂) made in Georgia in the last 15 years due to economic and regulatory drivers. These reductions directly led to measured visibility improvement and numerous other air quality related benefits at Cohutta Wilderness area and other nearby USDA Forest Service Class I areas in the southeastern US over that time.

Overall, the USDA Forest Service finds that the draft RH SIP is well organized and comprehensive. The Long-Term Strategies for this planning period appear to indicate that USDA Forest Service Class I Areas will continue to show visibility improvements better than the Uniform Rate of Progress (URP) through 2028, and we appreciate the commitment by Georgia EPD Air Protection Branch to evaluate progress in meeting the visibility goals during the 5-year progress reports. We offer these specific comments on the draft RH SIP for Georgia EPD review and consideration.

Source Considerations and Screening Threshold

The EPD used Particulate Matter Source Apportionment Technology (PSAT) to identify sources that contributed $\geq 1\%$ total visibility impairment caused by sulfate **or** nitrate at any Class I area in 2028. A four-factor analysis was then requested from these sources. The USDA Forest Service finds this method technically sound and greatly appreciates this approach as aggregating the contributions of these pollutants may exclude feasible, cost-effective control options for a single pollutant.

Class I Impact Modeling and Four-Factor Analysis

The Cohutta Wilderness Area is the only Class I area within the state of Georgia federally managed by the USDA Forest Service. Other USDA Forest Service Class I areas within proximity include Shining Rock Wilderness, Joyce Kilmer-Slickrock Wilderness, Linville Gorge Wilderness, and Sipsey Wilderness. The RH Rule requires each state to develop a long-term strategy that includes the control measures necessary to make reasonable progress at each Class I area outside the state that may be affected by emissions from the state.¹ The USDA Forest Service greatly appreciates that the EPD assessed Georgia-originating impacts on Class I areas both within and outside the state. Having said this, our overriding concern is that a sufficient number of emission sources are selected. The methodology discussed earlier for source consideration resulted in selection of three facilities for four-factor analysis, only one of which significantly impacts USDA Forest Service Class I areas in the Southeast. The USDA Forest Service assessed facilities contributing the majority of impairment attributable to Georgia at FS Region 8 Class I

¹ See "Guidance on Regional Haze State Implementation Plans for the Second Implementation Period" (https://www.epa.gov/sites/default/files/2019-08/documents/8-20-2019_-_regional_haze_guidance_final_guidance.pdf)

wilderness areas.² The USDA Forest Service would appreciate EPD conducting additional four-factor analyses for two facilities:

- GA Power Company - Plant Wansley; and
- TEMPLE INLAND.

If either facility has an anticipated closure date, the USDA Forest Service would ask that it be made federally enforceable through incorporation into the SIP. The USDA Forest Service appreciates clarification regarding emissions from Mohawk Industries Inc.

After screening, Georgia EPD ultimately solicited four-factor analyses from three facilities:

- International Paper (IP) – Savannah;
- Georgia Power – Plant Bowen; and
- Brunswick Cellulose.

EPD proposes the following:

- International Paper (IP) – Savannah will no longer be allowed to burn coal in the No. 13 Power Boiler (PB13);
- Plant Bowen will limit the Steam Generating Units (Emission IDs SG01, SG02, SG03 and SG04) to the MATS SO₂ emission limit of 0.20 lb/MMBtu based on a 30-day operating rolling average; and
- Brunswick Cellulose is required to eliminate the firing of tire derived fuel (TDF) in the No. 4 Power Boiler, and to limit the firing of No. 6 fuel oil to times of natural gas curtailment with additional fuel oil firing allowed during adverse bark/wood fuel conditions.

The USDA Forest Service finds this to be an acceptable start; however, the USDA Forest Service would like EPD to be aware of the increasing contribution of NO_x to visibility impairment. For the Cohutta Wilderness area from 2001- 2020, while SO₂ contributions to visibility impairment have decreased from 85% to 45%, NO_x contributions to visibility impairment have increased from 2% to 27% on the most impaired days.³ The USDA Forest Service recommends EPD assess NO_x controls for reasonable progress for the EPD-identified and additional recommended facilities.

Prescribed Fire Emissions

Fire plays an important role in shaping the vegetation and landscape in GA. Recurring fire has been a part of the landscape for thousands of years. Aggressive fire suppression, coupled with an array of other disturbances (e.g., logging and chestnut blight), has changed the historic composition and structure of the forests. Periodic prescribed burning and other vegetation management can recreate the ecological role of fire in a controlled manner. Fire and fuels management supports a variety of desired conditions and objectives across the forests (e.g., community protection, hazardous fuels reduction, native ecosystems restoration, historic fire regimes restoration, wildlife openings, and open woodland creation, etc.). Recent data on prescribed fire activity, especially within the USDA Forest Service, show

² Data sourced from Task 5 report: Area of Influence Analysis Southeastern VISTAS II Regional Haze Analysis Project (2018). Accessible at <https://www.metro4-sesarm.org/content/task-5-area-influence-analysis>

³ Data sourced from Federal Land Manager Environmental Database. Accessible at https://views.cira.colostate.edu/fed/Sites/?appkey=SBA_AqrvVisibility

that the number of acres burned in prescribed fires during 2011 were lower than all other recent years. For example, within the southern region of the USDA Forest Service a total of 749,080 acres were treated with prescribed fire in 2011, while the average number of acres treated annually from the years 2007-2019 was 980,422. The 2021 target for treatment by prescribed fire within the USDA Forest Service southern region was well over 1 million acres. Furthermore, the land management plans for each of the southern forests call for a cumulative total of up to 2.1 million acres per year to be treated with prescribed fire in the future. The 2017 Regional Haze Rule includes a provision to allow states to adjust the glidepath to account for prescribed fire. While prescribed fire is currently a minor contributor to visibility impairment on the 20% most impaired days as discussed in Section 7.9.1., the USDA Forest Service would like assurances that Georgia EPD will continue to recognize the important ecological role of prescribed fire and in the future adjust the glidepath to account for prescribed fire emissions accordingly.