



United States Department of the Interior



NATIONAL PARK SERVICE

Atlanta Federal Center
1924 Building
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Atlanta, GA 30303

IN REPLY REFER TO:

10.D (SERO-NR)

July 26, 2022

Karen D. Hays
Chief, Air Protection Branch
Georgia Environmental Protection Division
4244 International Parkway, Suite 120,
Atlanta, GA 30354

Dear Ms. Hays,

Thank you for the opportunity to review and provide comments on the Georgia pre-hearing draft Regional Haze State Implementation Plan (SIP) for the 2019–2028 planning period. The National Park Service (NPS) and the Georgia Environmental Protection Division Air Protection Branch (EPD) held a federal land manager (FLM) consultation meeting on June 14, 2022, followed by written comments from the NPS on June 22, 2022. The Clean Air Act requires that states “include a summary of the conclusions and recommendations of the federal land managers in the notice to the public” (42 U.S.C. §7491). NPS conclusions and recommendations presented during consultation are not included in the notice for this public comment period. EPD does provide for public transparency by including NPS consultation feedback in Appendix H of the proposed SIP.

The public review draft Georgia SIP did not address previous NPS input. A summary of the NPS conclusions and recommendations for improving the draft SIP are reiterated in this letter and documented in detail in our June 22, 2022 consultation comments. In summary, we recommend that EPD:

1. Document the impacts of Georgia-based emissions on visibility at Great Smoky Mountains National Park in Section 7 of the draft SIP.
2. Reconsider source selection decisions using different thresholds for the underlying area of influence analysis. This approach, first recommended to Georgia by the NPS on May 17, 2021, identifies six facilities for four-factor analysis.
3. Address NO_x emissions in reasonable progress determinations.
4. Conduct or expand four-factor analyses exploring both sulfur dioxide (SO₂) and nitrogen oxide (NO_x) emission reduction opportunities for the six facilities identified by the NPS in our consultation feedback as follows:
 - Georgia Power Co. Plants Bowen and Wansley
 - Evaluate ways to optimize current pollution control equipment
 - Establish both SO₂ and NO_x emission limits reflective of the existing control capabilities
 - Georgia Power Co. Plant Scherer
 - Analyze options for improving SCR performance to reduce NO_x emissions

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- International Paper Co. Temple Inland
 - Conduct four-factor analyses for SO₂ and NO_x emissions
- Brunswick Cellulose LLC
 - Conduct a four-factor analysis for NO_x emissions
- International Paper Co. Savannah
 - Update the four-factor analyses to include NO_x emissions

The NPS manages 48 of the 156 mandatory Class I areas across the country where visibility is an important attribute. The NPS Class I area most affected by haze-causing emissions from Georgia is Great Smoky Mountains National Park, in Tennessee and North Carolina. Haze can significantly diminish the visitor experience in this iconic park that offers awe-inspiring vistas of ancient, rugged mountains, historic landscapes, diverse vegetation, and picturesque waterfalls.

FLM review required under the Regional Haze process is one of the most significant opportunities for the NPS to carry out our congressionally designated “affirmative responsibility” to protect air quality related values in the Class I areas the service manages. The NPS works with states across the country on SIP development and is committed to this once-in-a-decade chance to contribute expertise and make a difference for clear views in national parks.

Section 51.308(i)(2) of the Regional Haze Rule underscores that the intent of the FLM consultation requirements is to provide an opportunity for the FLMs to “meaningfully inform the State’s decisions on the long-term strategy.” Georgia did not substantively address early NPS feedback (dated May 17th, 2021) in the SIP determinations and technical analyses—many of the concerns raised in this feedback were reiterated in our consultation comments. We encourage EPD to embrace the intent of FLM consultation and more substantively engage with the NPS to address our SIP recommendations.

We recognize and appreciate the significant emission reductions and visibility improvements that Georgia has achieved in the last decade. However, significant additional progress is necessary before the ultimate visibility goal of no human caused visibility impairment is realized at Great Smoky Mountains National Park. The cumulative benefits of emission reductions from many sources are necessary to achieve the Clean Air Act and Regional Haze Rule goal to prevent future and remedy existing visibility impairment in Class I areas. Georgia has an opportunity to improve the effectiveness of their Regional Haze SIP by choosing to consider additional facilities, explore NO_x emission reduction opportunities, and require cost-effective emission controls identified using the four statutory factors. These incremental steps are needed to advance reasonable progress goals.

We appreciate having the opportunity to review and comment on this important SIP and look forward to continued work with Georgia for clean air and clear views. If you have questions, contact Denesia Cheek (denesia_cheek@nps.gov, 770-883-1119) or Melanie Peters (melanie_peters@nps.gov, 720-644-7632).

Sincerely,



Lance Hatten
Acting Regional Director
Interior Region 2