PREHEARING
Clean Air Act Section 110(l) Noninterference Demonstration for the Revision of Georgia Rule 391-3-1-.02(rr) Gasoline Dispensing Facility – Stage I

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Air Protection Branch

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Executive Summary

The Georgia Environmental Protection Division (EPD) is requesting that the Environmental Protection Agency (EPA) remove the requirements of Enhanced Stage I Vapor Recovery Systems (Stage I EVR) from existing gasoline dispensing facilities in Catoosa, Walker, and Richmond Counties as found in Georgia Rule 391-3-1-.02(2)(rr) "Gasoline Dispensing Facility – Stage I", otherwise known as "Georgia Rule (rr)" from the Georgia State Implementation Plan (SIP). The term "Existing Gasoline Dispensing Facility" in this rule is defined as any GDF with "an approved Stage I Gasoline Vapor Recovery System that was in operation on or before April 30, 2008."

A Stage I EVR system is a gasoline vapor recovery system that has demonstrated the ability to collect at least 98% of vapors associated with the storage of gasoline at a Gasoline Dispensing Facility (GDF). Current regulations require that all applicable and existing GDFs in Catoosa, Walker, and Richmond Counties operate Stage I EVR systems by the upcoming date of May 1, 2023. Georgia EPD is requesting the removal of the Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties. Removal of Stage I EVR will not interfere with current Stage I requirements from existing GDFs or current Stage I EVR requirements from new GDFs as provided in Georgia Rule (rr).

This document contains Georgia EPD's demonstration that the request to remove Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties will not interfere with the maintenance or attainment of the National Ambient Air Quality Standards (NAAQS) or with Reasonable Further Progress (RFP) toward attainment of the NAAQS since the Stage I EVR requirements from existing GDFs in these specific counties have yet to take effect. This requested revision is consistent with section 110(l) of the CAA.

TABLE OF CONTENTS

LIST OF FIGURES

LIST of ACRONYMS and ABBREVIATIONS

Acronym	Meaning
AQIP	Air Quality Improvement Plan
CAA	Clean Air Act
CAAA	Clean Air Act Amendments of 1990
CARB	California Air Resource Board
CO	Carbon Monoxide
EAC	Early Action Compact
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
EVR	Enhanced Vapor Recovery
GDF	Gasoline Dispensing Facility
MVEBs	Motor Vehicle Emissions Budgets
NAAQS	National Ambient Air Quality Standards
NO_x	Nitrogen Oxides
NPRM	Notice of Proposed Rulemaking
Pb	Lead
PM	Particulate Matter
ppm	Parts per million
RFP	Reasonable Further Progress
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TCEQ	Texas Commission of Environmental Quality
VOC	Volatile Organic Compound

1.0 Introduction and Background

Georgia Environmental Protection Division (EPD) requests to modify the Georgia State Implementation Plan (SIP) by removing Enhanced Stage I Gasoline Vapor Recovery Systems (Stage I EVR) system requirements from existing Gasoline Dispensing Facilities (GDFs) in Catoosa, Walker, and Richmond Counties from the Georgia SIP. This technical analysis demonstrates that the removal of Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties from the Georgia SIP will not interfere with the attainment or maintenance of any National Ambient Air Quality Standards or any other Clean Air Act (CAA) requirement as prescribed in section 110(l) of the CAA. Normal Stage I vapor recovery requirements will still be required for those GDFs that are classified as existing.

Section 1.1 provides an overview of the Clean Air Act requirements. Section 1.2 will discuss the rule history of Georgia Rule (rr) and will aid in giving insight on vapor control technology and the differences between Stage I and Enhanced Stage I vapor controls.

1.1 Clean Air Act Provisions

In order to support Georgia's request to remove Stage I EVR system requirements from existing GDFs in Catoosa, Walker, and Richmond Counties from its SIP, Georgia EPD must demonstrate that the change will satisfy section 110(l), 193, and 184(b)(2) of the CAA. Since the State of Georgia adopted its Stage I Vapor Recovery Program after November 15, 1990, Section 193 does not apply. The State of Georgia is also not part of the northeast ozone transport region; thus section 184(b)(2) also does not apply. Therefore, this section consists of a detailed description of section 110(l).

1.1.1 Section 110(l) Requirement

Section 110(l) of the CAA governs EPA's ability to approve all SIP revisions. Specifically, section 110(l) states:

> *Each revision to an implementation plan submitted by a State under this chapter shall be adopted by such State after reasonable notice and public hearing. The Administrator shall not approve a revision of a plan if the revision would interfere with any applicable requirement concerning attainment and reasonable further progress (as defined in section 171 of this title), or any other applicable requirement of this chapter.*

The removal of the upcoming Stage I EVR requirements from existing GDFs from Catoosa, Walker, and Richmond Counties from the SIP must be evaluated to determine the potential to impact attainment or maintenance of the NAAQS and reasonable further progress (as defined in section 171) or any other CAA requirement as prescribed in section 110(l) of the CAA.

Section 171(1) states that for purposes of Part D of Title I, RFP "means such annual incremental reductions in emissions of the relevant air pollutant as are required by this part or may reasonably be required by the Administrator for the purpose of ensuring attainment of the applicable NAAQS by the applicable date." As per a 1995 memo sent on May 10 from the EPA, "whether dealing with the general RFP requirement of section 172(c)(2), or the more

specific RFP requirements of subpart 2 for classified ozone nonattainment areas (the 15 percent plan requirement of section 182(b)(1) and the 3 percent per year requirement of section 182(c)(2)), the stated purpose of RFP is to ensure attainment by the applicable date. If an area has in fact attained the standard, the stated purpose of the RFP requirement will have already been fulfilled and EPA does not believe that the area need submit revisions providing for the further emissions reductions described in the RFP provisions of section 182(b)(1) and 182(c)(2)(b) and (c)."

1.2 Georgia Rule (rr)

Georgia Rule (rr) requires counties to implement vapor recovery systems at GDFs to help to limit the amount of ozone precursors and toxic compounds emitted into the air. This section will cover the differences in vapor control technologies as well as the rule history of Georgia Rule (rr)

1.2.1 Stage I Vapor Recovery and Enhanced Stage I Vapor Recovery

Stage I vapor recovery refers to the capture of gasoline vapors which are generated when a tank truck delivers gasoline to a storage tank at a gasoline dispensing facility. Stage I vapor recovery technology controls the volatile organic compounds that are emitted from the refilling of gasoline storage tanks at GDFs. Vapors in the tank, which are displaced by the incoming gasoline, are routed through a hose into the cargo tanker instead of being vented to the atmosphere.

Stage I vapor recovery systems are associated with a minimum of 90% recovery efficiencies as per EPA's design criteria. Stage I EVR is a gasoline vapor recovery system that recovers at least 98% of the emissions at gasoline dispensing facilities during bulk gasoline deliveries.

1.2.2 Georgia Rule (rr) History

In the early 1980s, Georgia failed to meet the 1979 Ozone NAAQS, even though an approved 1981 SIP submittal stated it would do so by the year 1982. Thus, EPA called upon the state to revise the SIP. It was in the requested revision of this SIP where Georgia Rule (rr) was introduced [46 FR 57486].

Georgia Rule (rr) was then submitted as part of a volatile organic compound (VOC) Reasonably Available Control Technology (RACT) plan in order to meet EPA's SIP requirements for a 1985 SIP submittal to the EPA. During EPA's review of the submittal, it was determined that the 1985 SIP contained deficiencies and was not approvable. The SIP was then revised, modified, and sent back with changes on October 1, 1987. The changes made demonstrated that Atlanta's NAA would reach attainment by the year 1994. This package containing Georgia Rule (rr) as well as other VOC specific rules, was approved by EPA on October 13, 1992. In this first version of the rule, Georgia Rule (rr) did not include Stage I EVR, and instead contained normal Stage I vapor control requirements [57 FR 46780].

Georgia EPD submitted a 1993 SIP Submittal which contained changes to Rule (rr) that was then approved by EPA on March 26, 1999 [64 FR 20186]. This SIP submittal addressed

section 182(b)(1)(A) of the CAA which required nonattainment areas to develop plans to reduce VOC emissions by 15 percent. The changes to Georgia Rule (rr) in this SIP submittal lowered applicability thresholds from facilities with a throughput of more than 20,000 gallons per month to 10,000 gallons per month in the Atlanta area. The revised applicability threshold was estimated to result in a VOC reduction of 3.05 tons/day. However, section 182(b)(1)(A) stated that corrections to RACT plans were not creditable as they were required prior to 1990, so these reductions were not credited toward the 15 percent reduction plan.

Georgia Rule (rr) underwent a second revision that was approved by the EPA on July 11, 2002 [67 FR 45909]. The rule was amended to do the following:

- incorporate updated testing requirements,
- change the definition of a "Gasoline dispensing facility",
- change the definition of "Division approved",
- clarify the exemptions afforded to certain gasoline facilities,
- update requirements for documentation and reporting of testing required for vapor recovery systems, and
- correct typographical errors

These changes were made in 2001 and were in accordance with changes in the California Air Resources Board (CARB) Stage I vapor recovery program which the present rule references.

The third revision of Georgia Rule (rr) was approved by the EPA on August 26, 2005 [70 FR 50195 & 70 FR 50199]. The rule was amended such that the Catoosa, Walker, and Richmond Counties were added to the rule's list of applicable counties. The Augusta metro region, which contains Richmond County as part of the Lower Savannah Early Action Compact (EAC) Area, adopted Stage I vapor control measures as well as others in order to accelerate attainment of the 1997 8-hour ozone NAAQS [70 FR 50195]. Catoosa and Walker Counties as part of the Chattanooga EAC area likewise adopted Stage I vapor control measures to also meet attainment of the 1997 8-hour ozone standard [70 FR 50199].

The fourth revision of the rule was submitted to EPA in 2009 and later approved in 2012 [77 FR 59554]. The revision expanded the requirements of Georgia Rule (rr) to 7 additional counties (Barrow, Bartow, Carroll, Hall, Newton, Spalding, and Walton). It was in this revision that Georgia Rule (rr) also established the requirement that all applicable GDFs must implement Stage I EVR systems in place of normal Stage I vapor recovery systems by certain deadlines depending on the county. In this 2009 revision, existing GDFs located in Catoosa, Walker, and Richmond Counties are required to install Stage I EVR before May 1, 2023. The term "Existing Gasoline Dispensing Facility" in this rule is defined as any GDF with "an approved Stage I Gasoline Vapor Recovery System that was in operation on or before April 30, 2008." Based on this definition in Georgia Rule (rr), GDFs that were in operation before April 30, 2008 will be the only GDFs that will be subject to this May 1, 2023 deadline since any new GDF (any GDF in operation after April 30, 2008) is already required to be constructed with Stage I EVR upon startup.

The estimated number of "Existing GDFs" in the counties of Catoosa, Walker, and Richmond is 180[1]. Removing these pending EVR requirements in these counties will not increase the estimated number of "Existing GDFs" in those counties. After consultation with the Georgia EPD Mobile and Area Sources Program (Compliance Unit) and the Georgia EPD Underground Storage Tank Management Program, there were no incentives found for existing GDFs that have already adopted Stage I EVR to switch back to normal Stage I technology. Doing so would require facilities to spend additional money[2] and halt business to access underground tanks in order to switch back to equipment that is becoming increasingly outdated in the industry. With no economic advantage for doing so, we believe there would not be an increase in the number of facilities using basic Stage I vapor control technologies. Therefore, emissions will not increase as a result of the removal of this requirement from existing GDFs in these areas.

2.0 NAAQS Impact and Emission Trends

As stated in Section 1.0, 110(l) of the CAA requires that a SIP revision not interfere with any applicable requirement concerning attainment and reasonable further progress (as defined in section 171 and 182 of the CAA). This section will demonstrate that the removal of Stage I EVR for existing GDFs in Catoosa, Walker, and Richmond Counties will result in no emissions increases and will not interfere with the attainment or maintenance of any National Ambient Air Quality Standards or any other Clean Air Act (CAA) requirement as prescribed in section 110(l) of the CAA.

Rule (rr) has no impacts on sulfur dioxide (SO_2), oxides of nitrogen (NOx), carbon monoxide (CO), lead (Pb), or primary fine particulate matter ($PM_{2.5}$) emissions since these emissions do not evaporate from gasoline. For that reason, any changes to Rule (rr) will have no impact on the SO_2, NO_2, CO, or Pb NAAQS.

Rule (rr) does impacts VOC emissions. VOC and NOx emissions are precursors to ozone formation. VOC, SO_2, and NOx emissions are precursors to secondary $PM_{2.5}$ formation. The removal of Stage I EVR for existing GDFs will not increase VOC emissions from the effected sources. Instead, it will remove future VOC emission reductions that are no longer needed for attainment and maintenance of the ozone and $PM_{2.5}$ NAAQS. This demonstration will present SO_2, NOx, VOC, and direct $PM_{2.5}$ emission trends since 2000 and ozone and $PM_{2.5}$ ambient concentration trends since 2006.

In general, emissions of SO_2, NOx, VOC, and direct $PM_{2.5}$ in Catoosa, Walker, and Richmond Counties, as well as the entire state of Georgia, have been decreasing since 2000. In addition, the ambient measurements of ozone and $PM_{2.5}$ in these areas have been decreasing since 2006 and have been well below the NAAQS for many years. Therefore, the future VOC emission reductions planned for 2023 are not needed to attainment or maintenance the ozone or $PM_{2.5}$ NAAQS in these areas.

[1] This estimation of existing GDFs was gathered using the Land Environmental Management Information Repository (https://geos.epd.georgia.gov/GA/LEMIR/Public/Doc/LEMIR_User_Guide_v3.0_20160205.pdf).
[2] Replacement cost is approximately $1,000 for 3 tanks, e-mail communication with Georgia EPD's Shaheer Muhanna (Manager of Regulatory Compliance I Unit) on 01/19/2022.

2.1 SO_2 Emission Trends

Sulfur Dioxide (SO_2) is a gaseous molecule that can cause harm to the human respiratory system to those sensitive to the effects. It is also a pollutant of concern as it reacts with other compounds in the atmosphere to form fine particles that reduce visibility and contribute to haze. Fossil fuel combustion is considered the largest source of SO_2 emissions.

Figure 2.1 shows the trend in SO_2 emissions (tons/year) in the State of Georgia and in Richmond County. Figure 2.2 shows the trend in SO_2 emissions (tons/year) in the State of Georgia and in Catoosa and Walker Counties.

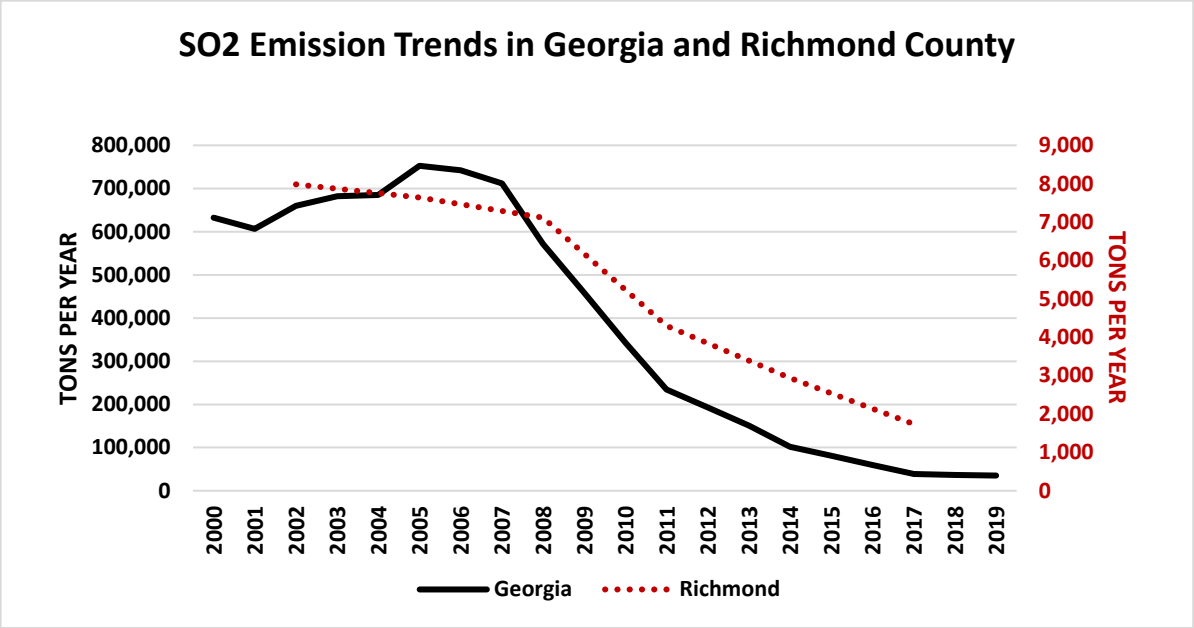

Figure 2-1. SO_2 Emission Trends in Georgia and Richmond County.

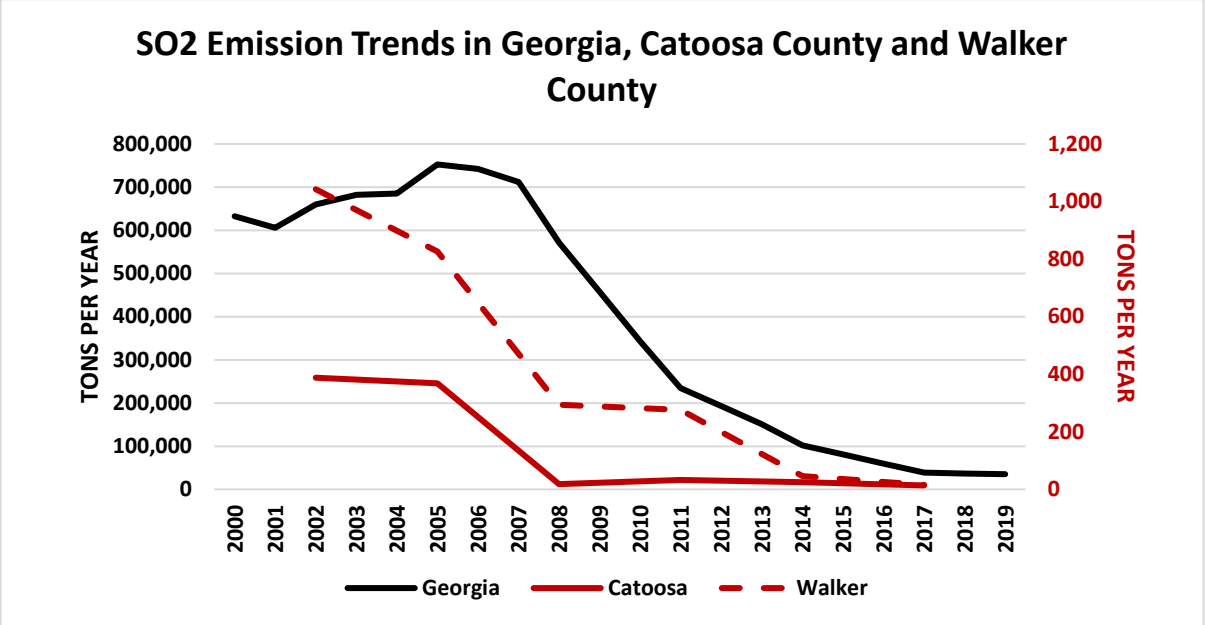

Figure 2-2. SO_2 Emission Trends in Georgia, Catoosa County, and Walker County.

These two graphs give insight into how much SO_2 emissions have decreased in the past two decades, not only statewide, but also in Catoosa, Walker, and Richmond Counties. The peak SO_2 emissions in the state of Georgia occurred in 2005 with a value of 752,531 tons per year. This has since dropped to 35,204 tons per year of SO_2 emitted in the year 2019. The reductions in SO_2 across the board can most likely be attributed to curtailing emissions from electrical generating units that supply the state with power.

2.2 $PM_{2.5}$ Emission Trends

Particulate matter (PM) is a mixture of solid and liquid particles found in the air. If a particle has a diameter of 2.5 micrometers or less, it is categorized as fine particulates or $PM_{2.5}$. These fine particles adversely impact human health, especially respiratory and cardiovascular systems of vulnerable populations which includes children, the elderly, and people with preexisting cardiovascular/respiratory conditions. $PM_{2.5}$ also affects visibility through the scattering and absorption of light.

$PM_{2.5}$ emissions (tons/year) since the year 2000 can be seen in Figure 2.3 for the state of Georgia and Richmond County.

Similarly, $PM_{2.5}$ emissions since the year 2000 can be seen in Figure 2.4 for the state of Georgia, and Catoosa and Walker Counties. In general, there has been a slight decrease in direct $PM_{2.5}$ emissions across the state of Georgia, and Catoosa and Walker Counties. Direct $PM_{2.5}$ emissions in Richmond County have remained relatively constant (fluctuating between 2,000 and 3,800 tons/year).

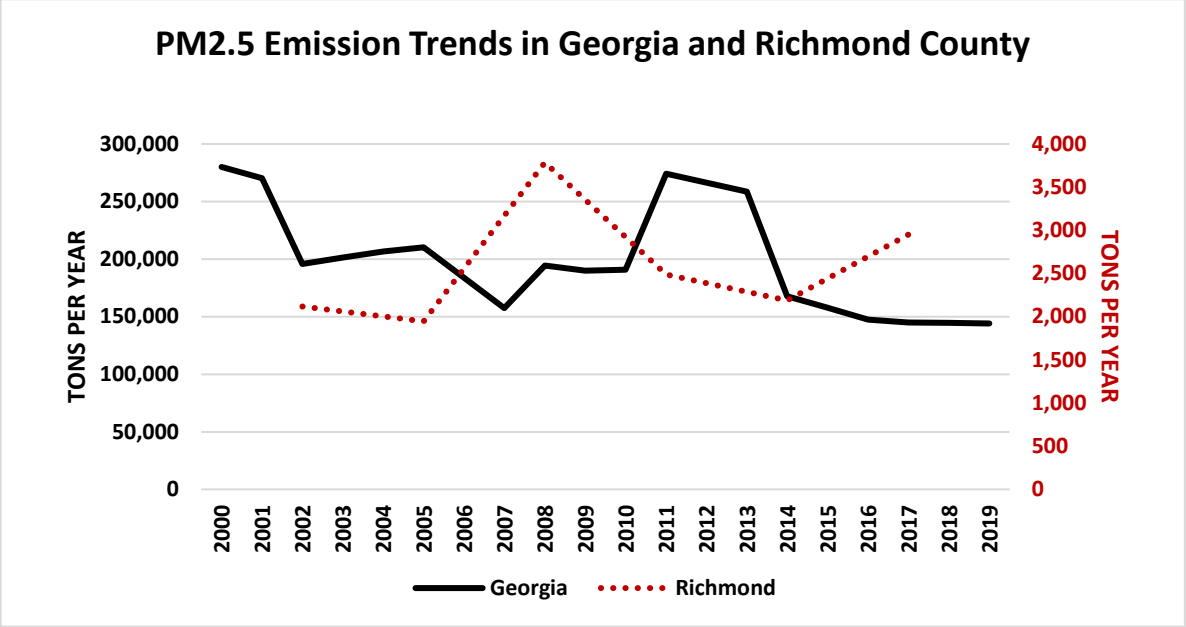

Figure 2-3. $PM_{2.5}$ Emission Trends in Georgia and Richmond County.

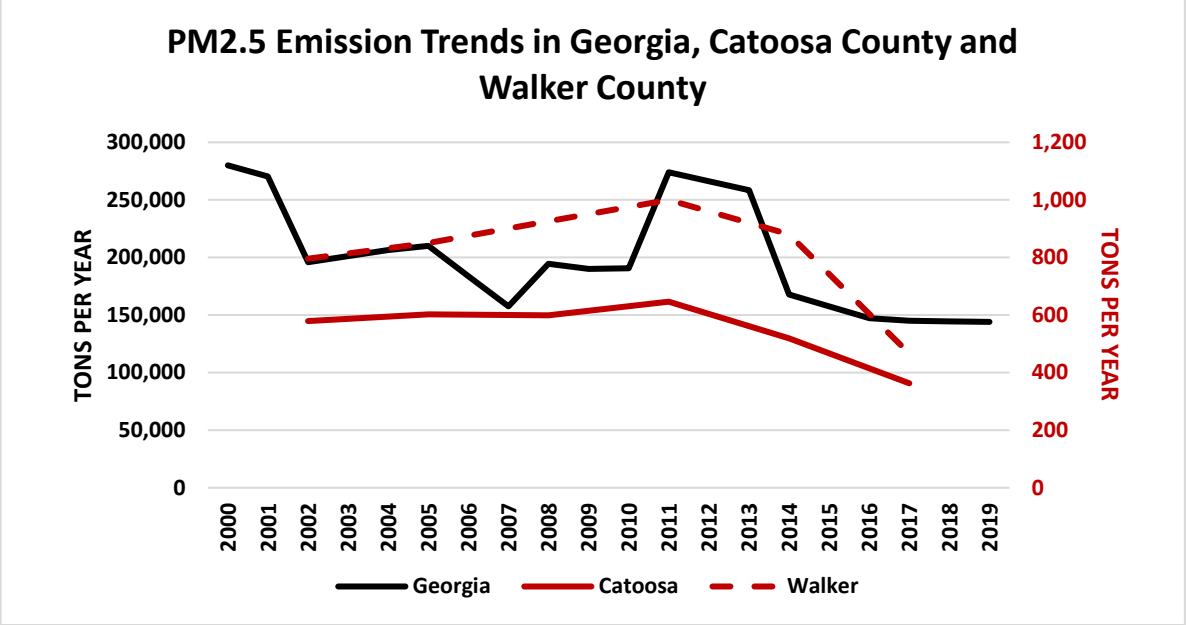

Figure 2-4. $PM_{2.5}$ Emission Trends in Georgia, Catoosa County and Walker County

2.3 VOC Emission Trends

Volatile organic compounds (VOCs) are found in gasoline vapors and contribute to ground-level ozone and secondary $PM_{2.5}$ concentrations. However, since existing Gasoline Dispensing Facilities are not yet required to use Stage I EVR technology, the removal of this requirement will not increase VOC emissions in Catoosa, Walker, or Richmond Counties.

Figure 2.5 contains VOC emissions (tons/year) over the last 20 years in the State of Georgia and in Richmond County. Since the year 2000, emissions have trended downward. The same downward trend in VOC emissions (tons/year) since the year 2000 can be seen in Figure 2.6 for the State of Georgia and Catoosa and Walker Counties.

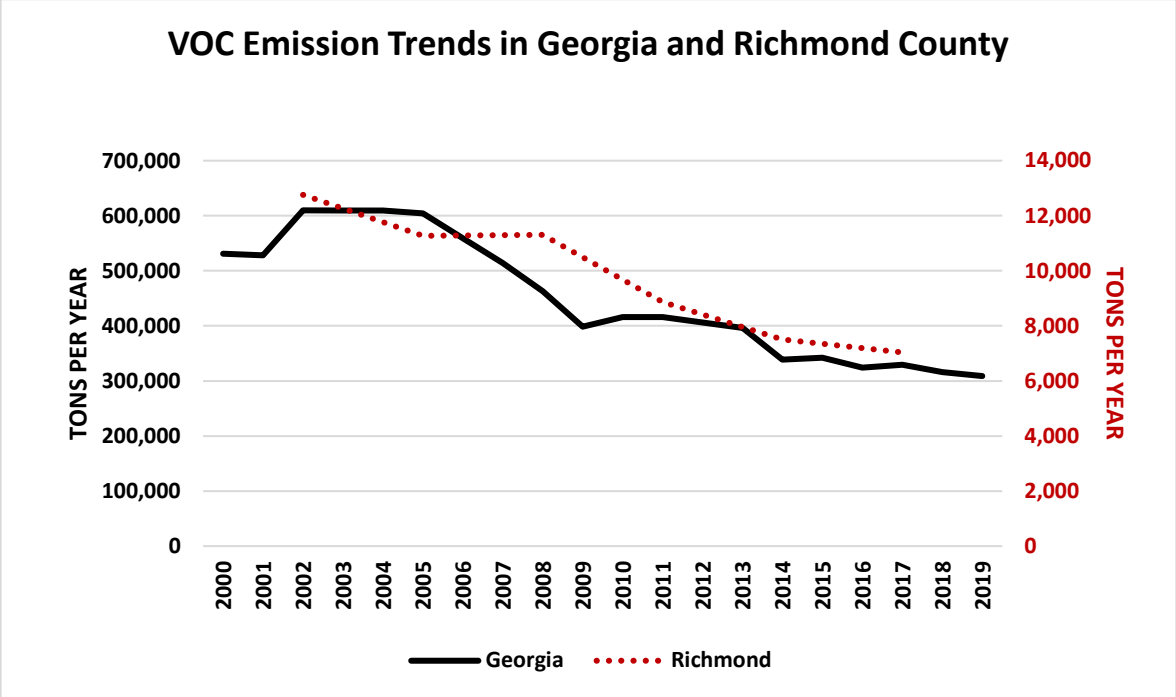

Figure 2-5. VOC Emission Trends in Georgia and Richmond County.

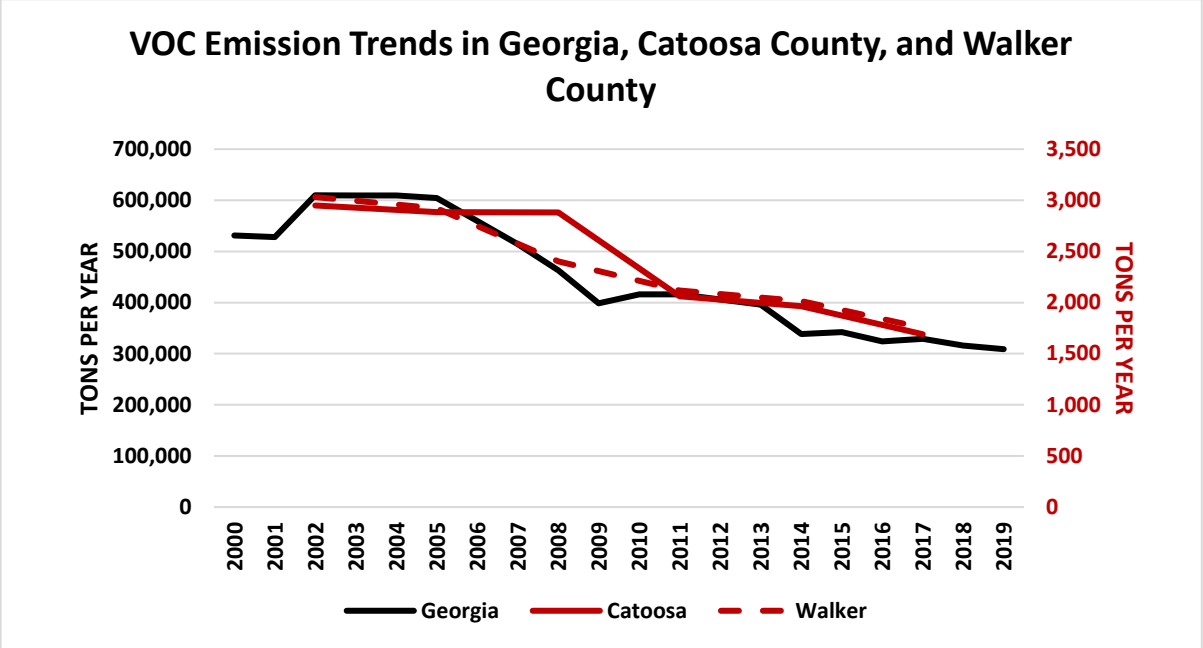

Figure 2-6. VOC Emission Trends in Georgia, Catoosa County and Walker County.

2.4 NOx Emission Trends

Nitrogen oxides (NOx) consist of nitrogen oxide (NO) and nitrogen dioxide (NO_2). NOx contributes to the formation of tropospheric ozone via the reaction between NOx, VOCs, and sunlight and can contribute to $PM_{2.5}$ concentrations by forming secondary nitrate particles. Most NO_x emissions come from mobile sources through the process of combustion. The emissions of NO_x are not expected to be affected as a result of removing Stage I EVR requirements from existing GDFs.

Figure 2.7 represents NOx emissions (tons/year) in the State of Georgia and in Richmond County over the past two decades.

Figure 2.8 depicts the NO_x emission trends in the State of Georgia and in Catoosa and Walker Counties since the year 2000.

Both figures indicate that NOx emissions have generally been on the decline since the year 2000. The peak year for NOx emissions was 2002 with a total of 794,2879 tons of the pollutant emitted. At both county and state levels, NO_x emissions have been declining since the year 2008.

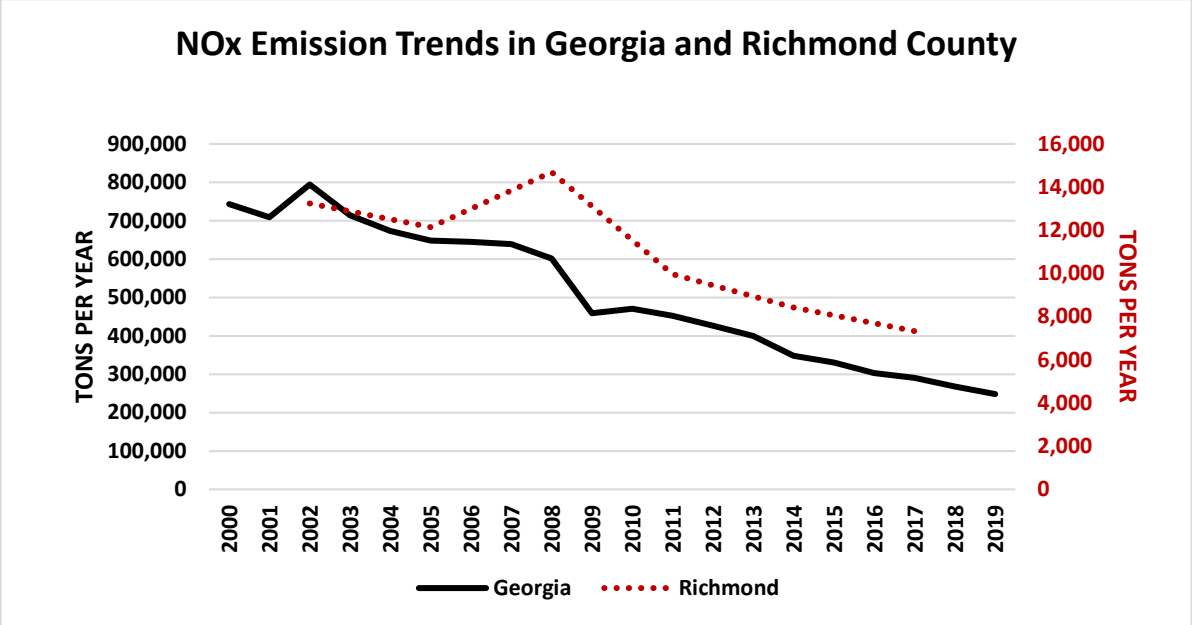

Figure 2-7. NO_x Emission Trends in Georgia and Richmond County.

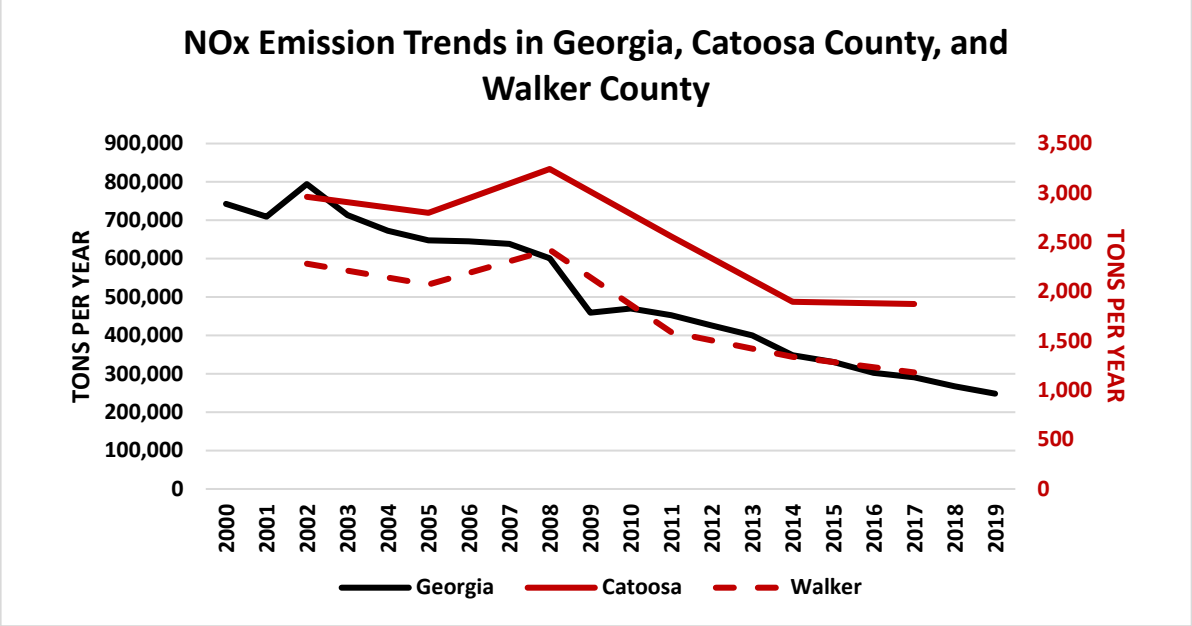

Figure 2-8. NO_x Emission Trends in Georgia, Catoosa County, and Walker County.

2.5 Ozone Design Values

A monitoring site is in attainment with the 2015 8-hour ozone standard when the average of the annual fourth-highest daily maximum concentration over three consecutive years measured at the monitor does not exceed 0.070 ppm. This 3-year average is termed the

"design value" for the monitor. The design value is a statistic that describes the air quality status of a given location relative to the level of the National Ambient Air Quality Standard.

Figure 2.9 represents the design values of ozone from 2006 to 2020 at monitors in Hamilton County in Tennessee, and Chattooga and Richmond Counties in Georgia. These monitors were chosen because Chattooga County borders Walker County to the south and Hamilton County borders it to the north. These monitors show ozone design values for that entire area trending downward. Air quality in these counties currently falls below the NAAQS of 70 ppb and has been below the standard since 2014. These significant reductions in ozone have been achieved without retrofitting existing gasoline dispensing facilities in the area with Stage I EVR control technologies.

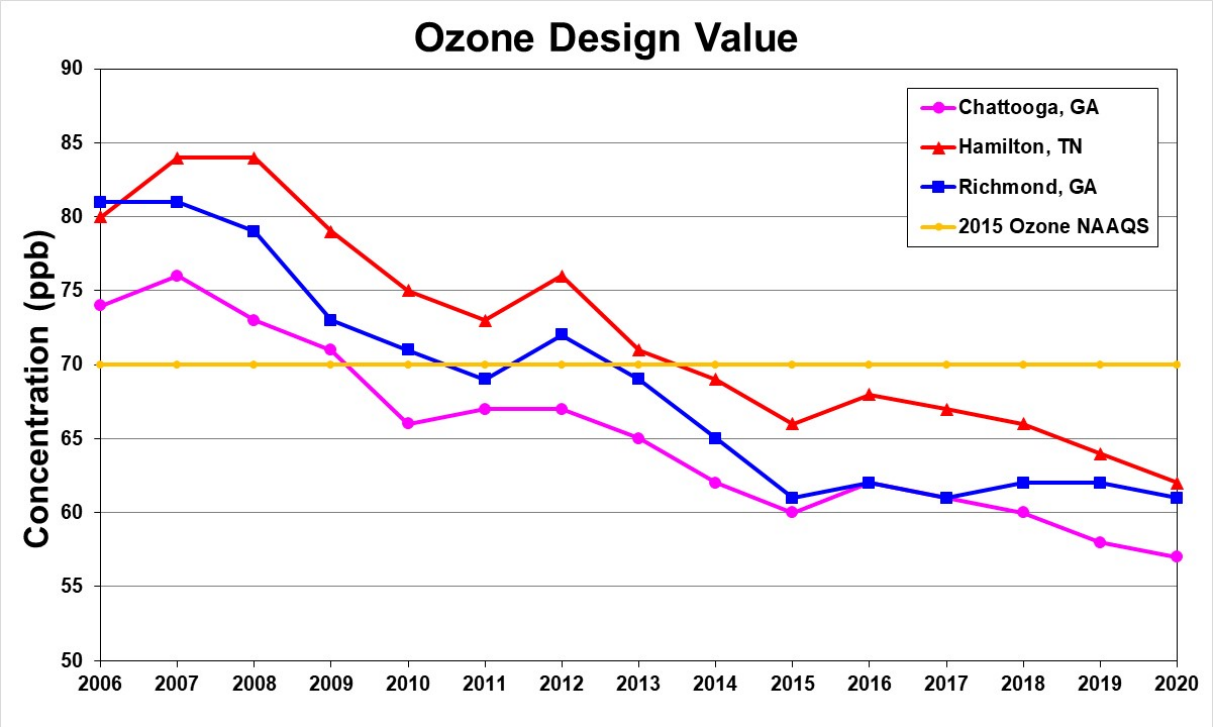

Figure 2-9. Ozone Design Values in Chattooga, Hamilton, and Richmond Counties.

2.6 $PM_{2.5}$ Design Values

The current annual $PM_{2.5}$ standard is 12.0 micrograms per cubic meter ($\mu g/m^3$). An area is meeting the standard if the three-year average of its annual average $PM_{2.5}$ concentration is less than or equal to 12.0 $\mu g/m^3$.

Figure 2.10 shows the annual $PM_{2.5}$ design values from 2006 to 2020 from monitors in the counties of Richmond and Walker. Together, these monitors show that this standard has been met and maintained since 2012.

The 24-hour (daily) primary standard is designed to provide health protection against short-term fine particle exposures, particularly in areas with high peak $PM_{2.5}$ concentrations. The current daily $PM_{2.5}$ standard is 35 µg/m^3. Figure 2.11 contains the daily $PM_{2.5}$ design values from 2006 to 2020 at monitors in Richmond and Walker Counties. It can be clearly seen that the daily $PM_{2.5}$ standard has been met in both counties for all years shown on the chart.

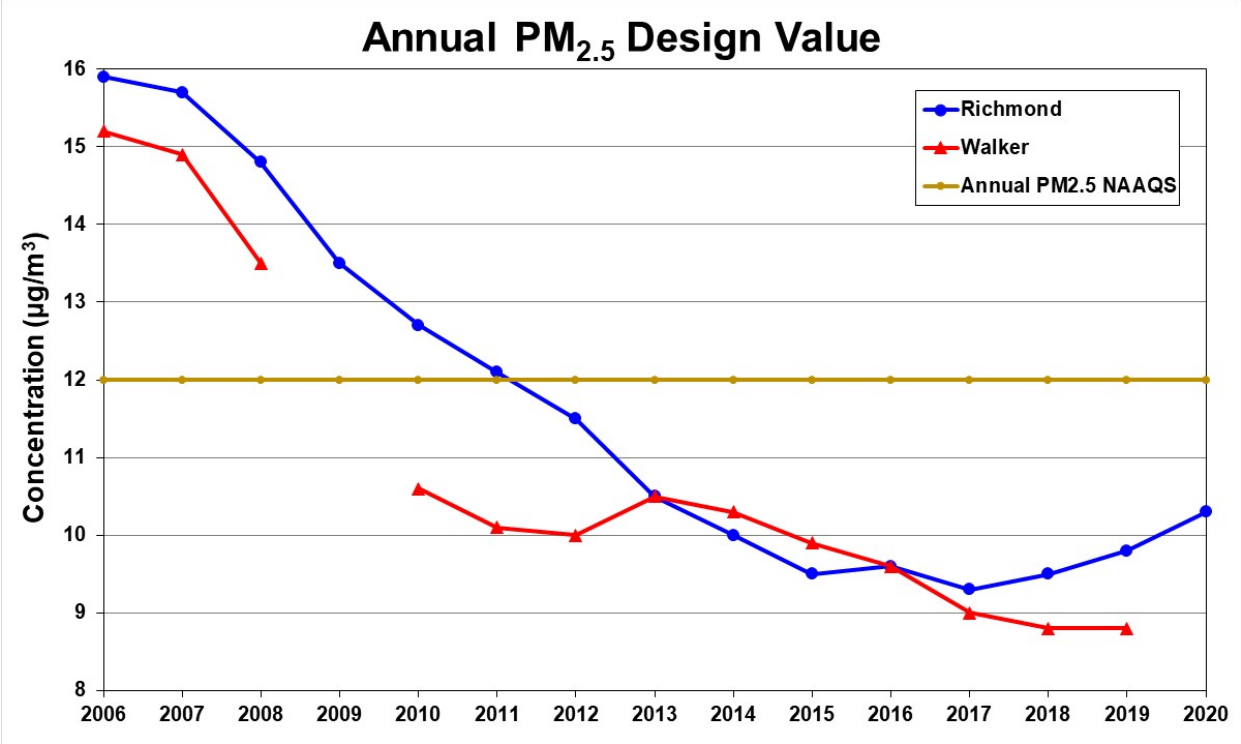

Figure 2-10. Annual $PM_{2.5}$ Design Values in Richmond and Walker Counties.

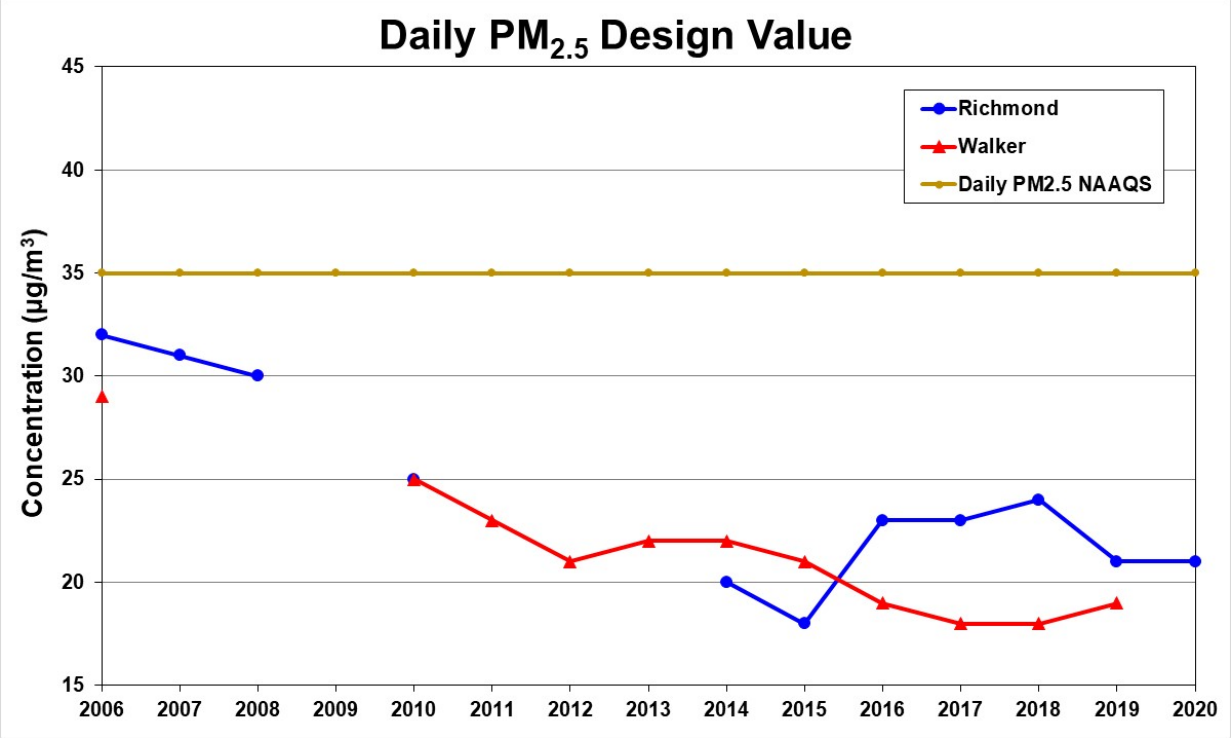

Figure 2-11. Daily $PM_{2.5}$ Design Values in Richmond and Walker Counties.

2.7 Overall Analysis of Air Quality for Georgia and the Catoosa, Walker and Richmond Counties

The state of Georgia has experienced a steady decline in SO_2, NO_x, $PM_{2.5}$, and VOC emissions since 2000. Similarly, on the county level, emissions of SO_2, NO_x, and VOC for Catoosa, Walker, and Richmond have experienced decreases. The exception is $PM_{2.5}$ in Richmond County. Although $PM_{2.5}$ emissions in Richmond County do not show a consistent trend downwards, design values show that the area has been in attainment with the annual $PM_{2.5}$ standard since 2012 and the daily $PM_{2.5}$ standard since 2006.

The downward trends of VOC and NO_x emissions statewide corresponds with ozone concentrations well below the standard in Chattooga, Hamilton and Richmond Counties. The monitors in these counties all have shown values less than 70 ppb since the year 2014.

The current ozone and $PM_{2.5}$ design values are well below the NAAQS. These low ozone and $PM_{2.5}$ concentrations were achieved without Stage I EVR requirements on existing GDFs in the Catoosa, Walker, and Richmond Counties. Therefore, the future VOC emission reductions planned for 2023 are not needed to attainment or maintenance the ozone or $PM_{2.5}$ NAAQS in these areas.

3.0 Removal Request

With the submission of this plan revision, Georgia EPD is requesting the removal of all Stage I EVR requirements from existing GDFs located in Catoosa, Walker, and Richmond Counties from Georgia's SIP. This document was prepared in accordance with the requirements of 110(l), which demonstrate that this revision will not interfere with attainment or reasonable further progress.

Furthermore, these revisions will not interfere with the attainment or maintenance of PM, ozone SO_2, NO_2, CO, or Pb NAAQS since the removal of Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties will not increase emissions of these criteria air pollutants or their related precursors. Normal Stage I vapor recovery requirements will still be required for those GDFs that are classified as existing. Ambient air monitors in the affected areas are currently measuring levels well below the NAAQS, doing so without ever having EVR systems installations mandated on existing GDFs. Georgia EPD has demonstrated in this SIP submittal that the EVR requirement removal is consistent with section 110(l) of the Clean Air Act and will not interfere with the attainment or maintenance of the NAAQS.

In EPA's August 7, 2012 "Guidance on Removing Stage II Gasoline Vapor Control Programs from State Implementation Plans and Assessing Comparable measures" it states on page 5: "[I]n areas where ozone formation is limited by the availability of NO_x emissions, a small (and ever-declining) increase in VOC emissions may have little or no effect on future ozone levels. The EPA would consider any air quality analyses and supporting information provided by a state to show that a proposed SIP revision would not interfere with attainment and maintenance of the NAAQS." This document shows that the removal of Stage I EVR for existing GDFs in Catoosa, Walker, and Richmond Counties will result in no increases in VOC emissions compared to the current trends since the technology has yet to be implemented in those counties. Since the VOC emissions will not increase, removal of Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties will not interfere with attainment or maintenance of the NAAQS.

4.0 Conclusion

Georgia EPD is requesting the removal of Enhanced Stage I Vapor Recovery Technology requirements from existing GDFs in Catoosa, Walker, and Richmond Counties from Georgia Rule (rr) and the Georgia SIP. The technology is unnecessarily stringent and will have no effect on air quality given historical emissions and air quality measurement trends. The removal of these requirements will not interfere with the attainment or maintenance of any NAAQS or any other CAA requirement as prescribed in section 110(l) of the CAA. Although this plan focuses on ozone and $PM_{2.5}$, the removal of Stage I EVR requirements from existing GDFs in Catoosa, Walker, and Richmond Counties from the Georgia SIP will have no increase in emissions of direct PM, SO_2, NO_2, CO, or Pb and will not interfere with the attainment or maintenance of any NAAQS (ozone, $PM_{2.5}$, SO_2, NO_2, CO, or Pb).

For these reasons, the removal of Enhanced Stage I Vapor Recovery requirements from existing GDFs in Catoosa, Walker, and Richmond Counties from Georgia Rule (rr) and the Georgia SIP meets the requirements of 110(l).