Georgia's Designation Recommendations for the 2024 $PM_{2.5}$ NAAQS - Technical Analysis Document -

In Section 107(d) of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) requires states to submit area designation recommendations by a date specified by EPA. On February 7, 2024, EPA published a guidance memorandum entitled "Initial Area Designations for the 2024 Revised Primary Annual Fine Particle National Ambient Air Quality Standard" (EPA's Designation Guidance) which sets the deadline for submitting designation recommendations as February 7, 2025. The following discussion is the Georgia Environmental Protection Division's (EPD's) technical analysis to support its designation recommendations.

EPA's Designation Guidance recommends that designation recommendation analysis start with counties included in each Core Based Statistical Area (CBSA) or Combined Statistical Area (CSA), and EPA "intends to use the most recent list of CBSAs and CSAs in this designations process, published in March 2020." As such, Georgia EPD will also use the most recent list of CBSAs and CSAs in its recommendation process. In July 2023, the US Census published a new definition of CBSA or CSA.[1] Therefore, the following technical analysis is based on the July 2023 definition of CBSA and CSA. For 2021-2023, Georgia operated and maintained 21 fine particulate matter ($PM_{2.5}$) sites in 10 CBSAs or CSAs and one additional site located in an area that is not part of a CBSA. In addition, five non-Georgia sites are located in multi-state CSAs or CBSAs. The 2021-2023 $PM_{2.5}$ annual $PM_{2.5}$ arithmetic means and design values for each monitor contained in these CBSAs, CSAs, and other areas are shown in Appendix A.

Although EPA's Designation Guidance recommends the use of 2021 to 2023 data for state recommendations (p. 3), the memorandum also states that "The EPA expects that in making final designations decisions, the EPA will rely on air quality data from 2022 to 2024." (p. 3). In addition, EPA lays out expectations and processes for exceptional events demonstrations in initial designation recommendations by a state, and final designation determinations by EPA in the section entitled "Exceptional Events and Designations" of EPA's Designation Guidance. On February 7, 2025, Georgia EPD submitted 129 exceptional events demonstrations[2] via EPA's State Planning Electronic Collaboration System. In making our designation recommendations, Georgia EPD has assumed that EPA will concur with Georgia EPD's submitted exceptional events demonstrations for 2021-2023. These exceptional events have been excluded in the calculation of design values for Georgia's designation recommendations provided in this document. Georgia EPD will also submit exceptional events demonstrations for 2024 along with an updated technical analysis document for the updated initial designation recommendation that will be submitted by September 30, 2025. Georgia EPD also assumes that EPA will concur with all of Georgia EPD's 2024 exceptional events. The following sections present technical analysis results for $PM_{2.5}$ air quality in each of the CBSAs, CSAs, and other areas in Appendix A followed by Georgia's designation recommendations.

[1] https://www2.census.gov/programs-surveys/metro-micro/geographies/reference-files/2023/delineation-files/list1_2023.xlsx

[2] https://epd.georgia.gov/air-protection-branch/air-branch-programs/planning-and-support-program/exceptional-event

Air Quality Data

Albany, GA CBSA

The Albany, GA CBSA (Albany CBSA) consists of Dougherty, Lee, Terrell, and Worth Counties. There is one $PM_{2.5}$ monitoring site (AQS ID: **13-095-0007**) in the Albany CBSA.

At the **13-095-0007** $PM_{2.5}$ site (Albany), there are two Federal Reference Method (FRM) monitors and one Federal Equivalent Method (FEM) monitor. One FRM monitor collected data on a one in three-day schedule until August 8, 2022, and from that point on, began collecting data on a daily schedule. A collocated FRM monitor collected data on a one in twelve-day schedule until September 10, 2022, at which point it began collecting data on a one in three-day schedule. In addition, the FEM monitor located at this site collected data continuously throughout the 2021-2023 monitoring period. From January 1, 2022, to July 31, 2023, there was a National Ambient Air Quality Standard (NAAQS) exclusion for testing the data network alignment on the FEM monitor. There is an additional NAAQS exclusion approved for August 1, 2023, to August 1, 2025, for testing the data network alignment on the same monitor.

As provided in Appendix A, the 2023 design value for this site is equal to 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all counties in the Albany, GA CBSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Atlanta--Athens-Clarke County--Sandy Springs, GA-AL CSA

The Atlanta--Athens-Clarke County--Sandy Springs CSA (Atlanta CSA) consists of 10 CBSAs:

1. Athens-Clark County, GA CBSA - Clarke, Madison, Oconee, and Oglethorpe Counties
2. Atlanta-Sandy Springs-Roswell, GA CBSA - Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lumpkin, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton Counties
3. Calhoun, GA CBSA - Gordon County
4. Cedartown, GA CBSA - Polk County
5. Cornelia, GA CBSA - Habersham County
6. Gainesville, GA CBSA - Hall County
7. Jefferson, GA CBSA - Jackson County
8. LaGrange, GA-AL CBSA - Chambers County, AL and Troup County, GA
9. Rome, GA CBSA - Floyd County
10. Thomaston, GA CBSA - Upson County

There are eight $PM_{2.5}$ monitoring sites (AQS IDs: **13-059-0002, 13-063-0091, 13-067-0003, 13-089-0002, 13-121-0039, 13-121-0056, 13-135-0002,** and **13-139-0003**) in the Atlanta CSA. One site is a near-road microscale site (**AQS ID: 13-121-0056**) that is not suitable for comparison with 2024 annual $PM_{2.5}$ NAAQS.

At the **13-059-0002** $PM_{2.5}$ site (Athens), there are two FEM monitors that collected data continuously during the 2021-2023 monitoring period. The 2021-2023 annual $PM_{2.5}$ design value is 8.7 $\mu g/m^3$.

At the **13-063-0091** $PM_{2.5}$ site (Forest Park), there is an FRM monitor that collected data on a one in three-day schedule during the 2021-2023 monitoring period. The 2021-2023 annual $PM_{2.5}$ design value is 8.9 $\mu g/m^3$.

At the **13-067-0003** $PM_{2.5}$ site (Kennesaw), there is an FRM monitor that collected data on a one in three-day schedule during the 2021-2023 monitoring period. On October 25, 2023, an FEM monitor also began collecting data. A NAAQS exclusion was approved for the FEM monitor from October 25, 2023, to

October 24, 2025, for testing the data network alignment. The 2021-2023 annual $PM_{2.5}$ design value is 8.9 µg/m^3.

At the **13-089-0002** $PM_{2.5}$ site (South DeKalb), there are two FRM monitors and one FEM monitor. One FRM monitor collected data on a one in three-day schedule from 2021 to September 6, 2022. After September 6, 2022, this FRM monitor began collecting data on a daily schedule. The collocated second FRM monitor collected data during the 2021-2023 period on a one in three-day schedule. The FEM monitor at this site also collected data during the 2021-2023 monitoring period. The 2021-2023 annual $PM_{2.5}$ design value is 8.7 µg/m^3.

At the **13-121-0039** $PM_{2.5}$ site (Fire Station #8), there is an FRM monitor that collected data on a one in three-day schedule during the 2021-2023 monitoring period. Georgia EPD submitted 2 exceptional events demonstrations to EPA for approval involving 2 Canadian wildfire events. The 2021-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 9.1 µg/m^3. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 µg/m^3.

At the **13-121-0056** $PM_{2.5}$ site (NR-GA Tech), there is an FRM monitor that collected data on a one in three-day schedule during the 2021-2023 monitoring period; however, this site is not comparable to the annual $PM_{2.5}$ NAAQS as discussed below. The 2021-2023 annual $PM_{2.5}$ design value is 9.7 µg/m^3. However, this microscale monitor is not eligible for comparison to the annual $PM_{2.5}$ NAAQS.

At the **13-135-0002** $PM_{2.5}$ site (Gwinnett Tech), there is an FEM monitor that collected data continuously during the 2021-2023 monitoring period. The 2021-2023 annual $PM_{2.5}$ design value is 8.5 µg/m^3.

At the **13-139-0003** $PM_{2.5}$ site (Gainesville), there are an FEM monitor and an FRM monitor. The FEM monitor collected data continuously during the 2021-2023 monitoring period and was the primary monitor from 2021 to March 23, 2023. However, a NAAQS exclusion was approved for the FEM monitor from January 1, 2021, to July 31, 2025, for testing the network data alignment. On March 24, 2023, the FRM monitor began collecting data as the primary monitor on a daily schedule. Therefore, the design value is based on 2023 FRM data only. The 2023 annual $PM_{2.5}$ design value is 8.9 µg/m^3.

As provided in Appendix A, the 2023 design values for all sites in the Atlanta CSA are equal to or less than 9.0 µg/m^3, with the exception of one site (NR-GA Tech). This near-road site is classified as a "microscale" site[3] and has a 2023 design value of 9.7 µg/m^3. According to 40 CFR 58.30, "$PM_{2.5}$ measurement data from sites that are not representative of area-wide air quality but rather of relatively unique micro-scale, or localized hot spot, or unique middle-scale impact sites are not eligible for comparison to the annual $PM_{2.5}$ NAAQS." 40 CFR 58.30 also notes that "Approval of sites that are suitable and sites that are not suitable for comparison with the annual $PM_{2.5}$ NAAQS is provided for as part of the annual monitoring network plan described in § 58.10." Georgia EPD publishes its Ambient Air Monitoring Plan, conforming to 40 CFR 58.10,[4] and has established that this site is not representative of area-wide air quality and is not suitable for comparison with the annual $PM_{2.5}$ NAAQS. Georgia EPD's Ambient Air Monitoring Plan specifically states:

> "Since the site was established in 2014, it has been one of GA AAMP's near-road sites and classified as a "microscale" site. The site is located seven meters from the nearest lane of interstate, within a unique hotspot, along the corridor of Interstate 75 and Interstate 85. There is continuous bumper-to-bumper, heavy traffic flow almost 24 hours a day along this corridor. Per the siting guidance for near-road ambient monitoring sites, the first near-road site in an MSA had to be located near the highest traffic counts in the MSA and placed "as near as

[3] https://airgeorgia.org/docs/2024%20Addendum%20to%20Annual%20Plan.pdf
[4] https://airgeorgia.org/networkplans.html

> practicable to the outside nearest edge of the traffic lanes of the target road segment" and should be within 20 meters of the nearest traffic lane (Table 4.3 of the Near-road NO_2 Technical Assistance Document, 2012). Due to the requirement of the near road network, the $PM_{2.5}$ measurements at the highest traffic count in the MSA and within 20 m of the interstate as near as practicable to the edge of the traffic are not representative of the $PM_{2.5}$ concentrations across the Atlanta-Sandy Springs-Alpharetta MSA. The traffic counts at the Interstate 75/85 corridor are not uniform across all of the Atlanta-Sandy Springs-Alpharetta MSA. Therefore, the NR-GA Tech $PM_{2.5}$ monitors should not be used for $PM_{2.5}$ attainment decisions for the annual $PM_{2.5}$ NAAQS, and should be reclassified as a non-regulatory, non-NAAQS monitor for the purpose of comparison to the annual $PM_{2.5}$ NAAQS."

As a result, Georgia EPD recommends that all Georgia counties in the Atlanta CSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Augusta-Richmond County, GA-SC CBSA

The Augusta-Richmond County, GA-SC CBSA (Augusta CBSA) consists of Burke, Columbia, Lincoln, McDuffie, and Richmond Counties in GA and Aiken and Edgefield Counties in SC. There are two $PM_{2.5}$ monitoring sites (AQS IDs: **13-245-0091** and **45-037-0001**) in the Augusta CBSA.

At the **13-245-0091** $PM_{2.5}$ site (Augusta), there are an FEM monitor and two collocated FRM monitors. The FEM monitor collected data during the 2021-2023 monitoring period with a NAAQS exclusion beginning in January of 2022. The primary FRM monitor operated on a one in three-day schedule from January 2022 to August 2022, and then on a daily schedule starting in August of 2022. The collocated secondary FRM monitor began collecting data in September of 2022 on a one in three-day schedule. In 2023, the two collocated FRM monitors continued to collect data, with a daily schedule for the primary FRM monitor and one in three-day schedule for the collocated secondary FRM monitor. The FEM monitor also continued to collect data with its NAAQS exclusion through 2023. Georgia EPD submitted 40 exceptional events demonstrations to EPA for approval involving 8 Canadian wildfire events, 29 prescribed fire events, and 3 holiday fireworks events. The 2021-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 9.7 $\mu g/m^3$. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 $\mu g/m^3$.

At the **45-037-0001** $PM_{2.5}$ site (Trenton, SC), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule during the 2021-2023 monitoring period. In addition to the FRM monitor, an FEM monitor has collected data continuously since June 7, 2022. The 2021-2023 annual $PM_{2.5}$ design value is 8.1 $\mu g/m^3$.

As provided in Appendix A, the 2023 design values for these sites are equal to or less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all GA counties in the Augusta CBSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Brunswick, GA CBSA

The Brunswick, GA CBSA (Brunswick CBSA) consists of Brantley, Glynn, and McIntosh Counties. There is one $PM_{2.5}$ monitoring site (AQS ID: **13-127-0006**) in the Brunswick CBSA.

At the **13-127-0006** $PM_{2.5}$ site (Brunswick), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule during the 2021-2023 monitoring period. Starting October 21, 2021, the FEM monitor began collecting data continuously. The 2021-2023 annual $PM_{2.5}$ design value is 7.9 $\mu g/m^3$.

As provided in Appendix A, the 2023 design value for this site is less than 9.0 µg/m^3, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all counties in the Brunswick CBSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Chattanooga-Cleveland-Dalton, TN-GA-AL CSA

The Chattanooga-Cleveland-Dalton, TN-GA-AL CSA (Chattanooga CSA) consists of six CBSAs:

1. Athens, TN CBSA - McMinn and Meigs Counties, TN
2. Chattanooga, TN-GA CBSA - Catoosa, Dade and Walker Counties, GA, and Hamilton, Marion, and Sequatchie Counties, TN
3. Cleveland, TN CBSA - Bradley and Polk Counties, TN
4. Dalton, GA CBSA - Murray and Whitfield Counties, GA
5. Scottsboro, AL CBSA - Jackson County, AL
6. Summerville, GA CBSA - Chattooga County, GA

There are four $PM_{2.5}$ monitoring sites (AQS IDs: **13-295-0004**, **47-065-0031**, **47-065-4002**, and **47-107-1002**) in the Chattanooga CSA.

At the **13-295-0004** $PM_{2.5}$ site (Rossville), there are an FRM monitor and an FEM monitor. This site was relocated and did not become operational until April 2021 when the FEM began collecting data. The FRM monitor collected data on a one in three-day sampling schedule beginning in May 2021. These two monitors continued collecting data through 2023. A NAAQS exclusion was approved for the FEM monitor starting April 2021 through July 31, 2025. Therefore, the design value is based only on the 2022-2023 FRM data. Georgia EPD submitted 4 exceptional events demonstrations to EPA for approval involving 4 Canadian wildfire events. The 2022-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 9.4 µg/m^3. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 µg/m^3.

At the **47-065-0031** $PM_{2.5}$ site (East Ridge, TN), one FRM monitor collected data on a one in three-day schedule until May 9, 2022. The 2021-2023 annual $PM_{2.5}$ design value is 8.3 µg/m^3.

At the **47-065-4002** $PM_{2.5}$ site (Chattanooga, TN), there are two FRM monitors and one FEM monitor. One FRM monitor collected data on a one in three-day schedule during the 2021-2023 period. A second collocated FRM monitor collected data at the site on a one in twelve-day schedule. The FEM monitor continuously collected data during the 2021-2023 monitoring period. For the FEM monitor, a NAAQS exclusion was approved from February 17, 2018, through September 30, 2022, for use as a special purpose monitor. Another second NAAQS exclusion approval for this monitor was made from September 30, 2023, to September 29, 2025, to evaluate new firmware and data alignment. The 2021-2023 annual $PM_{2.5}$ design value is 8.4 µg/m^3.

At the **47-107-1002** $PM_{2.5}$ site (Athens, TN), there is an FEM monitor that collected data continuously during the 2021-2023 monitoring period. The 2021-2023 annual $PM_{2.5}$ design value is 7.8 µg/m^3.

As provided in Appendix A, the 2023 design values for these sites are equal to or less than 9.0 µg/m^3, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all GA counties in the Chattanooga CSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Columbus-Auburn-Opelika, GA-AL CSA

The Columbus-Auburn-Opelika CSA (Columbus CSA) consists of three CBSAs:

1. Alexander City, AL CBSA - Tallapoosa County, AL
2. Auburn-Opelika, AL CBSA - Lee and Macon Counties, AL

3. Columbus, GA-AL CBSA - Chattahoochee, Harris, Marion, Muscogee, Stewart, and Talbot Counties, GA, and Russell County, AL

There are three $PM_{2.5}$ monitoring sites (AQS IDs: **01-113-0003**, **13-215-0008**, and **13-215-0012**) in the Columbus CSA.

At the **01-113-0003** $PM_{2.5}$ site (Phenix City, AL), there are two FRM monitors and an FEM monitor. One FRM monitor collected data on a one in six-day schedule starting in January of 2021. In addition, an FEM monitor collected data from 2021 through February 2023 and was the primary monitor from January 2021 until February 2023. A second collocated FRM monitor started collecting data in March of 2023 on a one in three-day schedule. The Alabama Department of Environmental Management submitted 22 exceptional events demonstrations to EPA for approval involving 1 Canadian wildfire event, 20 prescribed fire events, and 1 holiday fireworks event. The 2022-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 9.5 $\mu g/m^3$. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 $\mu g/m^3$.

At the **13-215-0008** $PM_{2.5}$ site (Columbus-Airport), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule until August 8, 2022, and then on a daily schedule starting on August 9, 2022. The FEM monitor collected data continuously beginning on November 9, 2021. From January 1, 2022, to July 31, 2023, a NAAQS exclusion was approved for testing data network alignment on the FEM. A second NAAQS exclusion has been approved for August 1, 2023, to September 30, 2024. The 2021-2023 annual $PM_{2.5}$ design value is 8.5 $\mu g/m^3$.

At the **13-215-0012** $PM_{2.5}$ site (Columbus-Baker), there are an FRM monitor and an FEM monitor. The FRM monitor has operated since March of 2021 on a one in three-day schedule. The FEM monitor started collecting data in June 2023 with a NAAQS exclusion. Georgia EPD submitted 9 exceptional events demonstrations to EPA for approval involving 2 Canadian wildfire events and 7 prescribed fire events. The 2021-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 10.0 $\mu g/m^3$. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 $\mu g/m^3$.

As provided in Appendix A, the 2023 design values for these sites are equal to or less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all GA counties in the Columbus CSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Douglas, GA CBSA

Douglas, GA CBSA consists of Atkinson and Coffee Counties. There is one $PM_{2.5}$ monitoring site (AQS ID: **13-069-0002**) in the Douglas CBSA.

At the **13-069-0002** $PM_{2.5}$ site (General Coffee), there are an FRM monitor and an FEM monitor. The FRM monitor collected data during the 2021-2023 monitoring period. Until October 16, 2023, this FRM monitor collected data on a one in three-day schedule. Starting on October 17, 2023, it began collecting data on a daily schedule. An FEM monitor began collecting data continuously on September 8, 2023. The 2021-2023 annual $PM_{2.5}$ design value is 7.3 $\mu g/m^3$.

As provided in Appendix A, the 2023 design value for this site is less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all GA counties in Douglas CBSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Macon-Warner Robins, GA CSA

The Macon-Warner Robins CSA (Macon CSA) consists of two CBSAs:

1. Macon-Bibb County, GA CBSA - Bibb, Crawford, Jones, Monroe, and Twiggs Counties

2. Warner Robins, GA CBSA - Houston and Peach Counties

There are three $PM_{2.5}$ monitoring sites (AQS IDs: **13-021-0007**, **13-021-0012**, and **13-153-0001**) in the Macon CSA.

At the **13-021-0007** $PM_{2.5}$ site (Macon-Allied), there are two collocated FRM monitors and one FEM monitor. The two FRM monitors operated during the 2021-2023 monitoring period. The primary FRM monitor collected data on a one in three-day schedule while the collocated FRM monitor collected data on a one in twelve-day schedule. In addition, an FEM monitor started collecting data in June of 2023, with a NAAQS exclusion on the data. Georgia EPD submitted 11 exceptional events demonstrations to EPA for approval involving 5 Canadian wildfire events and 6 prescribed fire events. The 2021-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 9.4 $\mu g/m^3$. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 $\mu g/m^3$.

At the **13-021-0012** $PM_{2.5}$ site (Macon-Forestry), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule during the 2021-2023 monitoring period. The FEM monitor also ran from 2021-2023 collecting data continuously. From 2021 to September 30, 2024, the FEM monitor acted as the primary monitor. The 2021-2023 annual $PM_{2.5}$ design value is 8.4 $\mu g/m^3$.

At the **13-153-0001** $PM_{2.5}$ site (Warner Robins), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule during the 2021-2023 monitoring period. The FEM monitor also collected data continuously from 2021-2023. The 2021-2023 annual $PM_{2.5}$ design value is 8.7 $\mu g/m^3$.

As provided in Appendix A, the 2023 design values for these sites are equal to or less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all counties in the Macon CSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Savannah-Hinesville-Statesboro, GA CSA

The Savannah-Hinesville-Statesboro CSA (Savannah CSA) consists of four CBSAs:

1. Hinesville, GA CBSA - Liberty and Long Counties
2. Jesup, GA CBSA - Wayne County
3. Savannah, GA CBSA - Bryan, Chatham, and Effingham Counties
4. Statesboro, GA CBSA – Bulloch and Evans Counties

There is one $PM_{2.5}$ monitoring site (AQS: **13-051-1002**) in the Savannah CSA.

At the **13-051-1002** $PM_{2.5}$ site (Savannah-L&A), there are an FEM monitor and an FRM monitor. The FEM monitor collected data continuously during the 2021-2023 monitoring period. In addition, the FRM monitor began collecting data on a daily schedule as of March 13, 2023. The data collected in 2022 by the FEM monitor did not meet the completeness requirements of 40 CFR Part 50, Appendix N and is therefore not considered valid data. The 2021-2023 annual $PM_{2.5}$ design value is 8.7 $\mu g/m^3$.

As provided in Appendix A, the 2023 design value for this site is less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all counties in the Savannah CSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Valdosta, GA CBSA

The Valdosta, GA CBSA (Valdosta CBSA) consists of Brooks, Echols, Lanier, and Lowndes Counties. There is one $PM_{2.5}$ monitoring site (AQS ID: **13-185-0003**) in the Valdosta, GA CBSA.

At the **13-185-0003** $PM_{2.5}$ site (Valdosta), there are an FRM monitor and an FEM monitor. The FRM monitor collected data on a one in three-day schedule during the 2021-2023 monitoring period. The FEM monitor collected data continuously from 2021-2023. The 2021-2023 annual $PM_{2.5}$ design value is 8.6 $\mu g/m^3$.

As provided in Appendix A, the 2023 design value for this site is less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that all counties in the Valdosta CBSA be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Washington County, GA

Washington County, GA is not part of a CBSA. There is one $PM_{2.5}$ monitoring site (AQS ID: **13-303-0001**) in Washington County.

At the **13-303-0001** $PM_{2.5}$ site (Sandersville), there are two FEM monitors. One continuous FEM monitor collected data during the 2021-2023 monitoring period, and an additional collocated FEM monitor started collecting data in March 2023. Georgia EPD submitted 63 exceptional events demonstrations to EPA for approval involving 16 Canadian wildfire events and 47 prescribed fire events. The 2021-2023 annual $PM_{2.5}$ design value (without EPA concurrence for the exceptional events) is 10.0 $\mu g/m^3$. The 2021-2023 annual $PM_{2.5}$ design value (with EPA concurrence for the exceptional events) is 9.0 $\mu g/m^3$.

As provided in Appendix A, the 2023 design value for this site is equal to or less than 9.0 $\mu g/m^3$, which indicates attainment with the 2024 $PM_{2.5}$ annual NAAQS. Therefore, Georgia EPD recommends that Washington County be designated attainment for the 2024 $PM_{2.5}$ annual NAAQS.

Summary and Recommendations

The technical analysis results presented above, along with the exceptional events demonstrations submitted to EPA on February 7, 2025, show that Georgia EPD has no sites with 2021-2023 design values over the 2024 annual $PM_{2.5}$ standard (Appendix A). Therefore, Georgia EPD recommends that all counties in Georgia be designated attainment/unclassifiable for the 2024 $PM_{2.5}$ annual NAAQS (Appendix B).