

June 17, 2019

Ms. Mary Walker  
Regional Administrator  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-3104

**RE: Georgia-Pacific Consumer Products LP-Savannah River Mill and Georgia Power-Plant McIntosh 2019 Annual Report for EPA's Data Requirements Rule for the 2010 1-Hour SO<sub>2</sub> NAAQS**

Dear Ms. Walker:

This report is being submitted to comply with the ongoing data requirements specified in 40 CFR 51.1205(b), for areas where modeling serves as the basis for designating that area as attainment for the 2010 1-Hour SO<sub>2</sub> NAAQS. The Georgia Environmental Protection Division (EPD) has determined that no additional modeling is needed to characterize air quality in Effingham County, Georgia.

On January 9, 2018, the U.S. Environmental Protection Agency (EPA) designated Effingham County, GA as Attainment/Unclassifiable with an effective date of April 9, 2018 (83 FR 1098). This designation was based on 2012-2014 modeling submitted to EPA by EPD, which demonstrated that SO<sub>2</sub> emissions from Georgia-Pacific Products – Savannah River Mill (SRM) and Plant McIntosh do not cause or contribute to any exceedances of the 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS). The highest modeled SO<sub>2</sub> design value in the modeling domain was 52 ppb.

According to the Data Requirements Rule for the 2010 1-hour SO<sub>2</sub> primary NAAQS (80 FR 51052):

*“For any area where modeling of actual SO<sub>2</sub> emissions serve as the basis for designating such area as attainment for the 2010 SO<sub>2</sub> NAAQS, the air agency shall submit an annual report to the EPA Regional Administrator by July 1 of each year...that documents the annual SO<sub>2</sub> emissions of each applicable source in each such area... The first report for each such area is due by July 1 of the calendar year after the effective date of the area's initial designation.”*

Table 1 contains the SRM SO<sub>2</sub> emissions that were modeled (2012-2014), along with EPA's Emission Inventory System (EIS) SO<sub>2</sub> emissions (2012-2017) from SRM. Table 2 contains the Plant McIntosh SO<sub>2</sub> emissions that were modeled (2012-2014), along with EPA's Clean Air Markets Division (CAMD) SO<sub>2</sub> emissions (2012-2018) from Plant McIntosh.

**Table 1. SO<sub>2</sub> emissions from SRM for 2012-2017.**

Calendar Year	EIS SO <sub>2</sub> Emissions (Tons/Year)	Modeled SO <sub>2</sub> Emissions (Tons/Year)
2012	3,036	2,770
2013	2,405	2,129
2014	2,105	2,062
2015	2,183	
2016	1,860	
2017	2,012	

**Table 2. SO<sub>2</sub> emissions from Plant McIntosh for 2012-2018.**

Calendar Year	CAMD SO <sub>2</sub> Emissions (Tons/Year)	Modeled SO <sub>2</sub> Emissions (Tons/Year)
2012	0	0
2013	491	491
2014	2,268	2,267
2015	350	
2016	127	
2017	98	
2018	130	

The 3-year average of SRM SO<sub>2</sub> emissions modeled for 2012-2014 was 2,320 TPY. The 3-year average of SO<sub>2</sub> emissions from SRM for 2015-2017 was 2,018 TPY which is 13 percent lower than the modeled emissions for 2012-2014. The 3-year average of Plant McIntosh SO<sub>2</sub> emissions modeled for 2012-2014 was 919 TPY. The 3-year average of SO<sub>2</sub> emissions from Plant McIntosh for 2016-2018 was 118 TPY which is 87 percent lower than the modeled emissions for 2012-2014. Therefore, EPD has determined that the previous modeling is conservative, no additional modeling is needed to characterize air quality in the area, and the area continues to meet the 2010 SO<sub>2</sub> NAAQS.

As required by 40 CFR 51.1205(b), a copy of this letter is available for public inspection at 4244 International Parkway, Suite 120, Atlanta, GA 30354. In addition, the public can inspect an electronic version of this letter at: <https://epd.georgia.gov/air/documents/srm-mcintosh-2019-annual-report-data-requirements-rule-2010-1-hour-so2-naaqs>.

Should you or your staff have any questions or comments, please feel free to contact James Boylan at [James.Boylan@dnr.ga.gov](mailto:James.Boylan@dnr.ga.gov) or 404-363-7014.

Sincerely,



Karen D. Hays, P.E.  
Chief, Air Protection Branch  
Georgia Environmental Protection Division