

Air Protection Branch

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June 28, 2022

Mr. Daniel Blackman
Regional Administrator
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

RE: International Paper-Savannah 2022 Annual Report for EPA's Data Requirements Rule for the 2010 1-Hour SO₂ NAAQS

Dear Mr. Blackman:

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 SO₂ NAAQS. The Georgia Environmental Protection Division (EPD) has determined that no additional modeling is needed to characterize air quality in the area surrounding International Paper-Savannah (IP Savannah).

On January 9, 2018, the U.S. Environmental Protection Agency (EPA) designated Chatham County, GA as Attainment/Unclassifiable with an effective date of April 9, 2018 (83 FR 1098). This designation was based on 2011-2013 modeling submitted to EPA by EPD, which demonstrated that SO₂ emissions from IP Savannah do not cause or contribute to any exceedances of the 1-hour SO₂ National Ambient Air Quality Standard (NAAQS). The highest modeled SO₂ design value in the modeling domain was 66 ppb.

According to the Data Requirements Rule for the 2010 1-hour SO₂ primary NAAQS (80 FR 51052):

“For any area where modeling of actual SO₂ emissions serve as the basis for designating such area as attainment for the 2010 SO₂ NAAQS, the air agency shall submit an annual report to the EPA Regional Administrator by July 1 of each year...that documents the annual SO₂ 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 IP Savannah SO₂ emissions that were modeled (2011-2013), along with EPA's Emission Inventory System (EIS) SO₂ emissions (2011-2020) from IP Savannah.

Table 1. SO₂ emissions from IP Savannah for 2011-2020.

Calendar Year	EIS SO ₂ Emissions (Tons/Year)	Modeled SO ₂ Emissions (Tons/Year)
2011	4,233	7,053
2012	3,622	6,267
2013	8,071	6,653
2014	8,123	
2015	5,866	
2016	5,590	
2017	5,186	
2018	5,630	
2019	3,936	
2020	4,260	

The increased facility-wide SO₂ emissions (324 TPY) in 2020 compared to the facility-wide SO₂ emissions in 2019 was primarily due to an increased demand of 8.4% on the Power Boiler #13 that fires non-condensable gas from the pulping process.

The 3-year average of IP Savannah SO₂ emissions modeled for 2011-2013 was 6,658 TPY. The 3-year average of SO₂ emissions from IP Savannah for 2018-2020 was 4,609 TPY which is 30.8 percent lower than the modeled emissions for 2011-2013. 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 SO₂ 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-protection-branch/air-branch-programs/planning-and-support-program/national-ambient-air-quality>

Should you or your staff have any questions or comments, please contact Steve Allison at Steve.Allison2@dnr.ga.gov or 470-938-3360.

Sincerely,



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