

**Air Protection Branch**

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May 22, 2025

Mr. Kevin J. McOmber  
Regional Administrator  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-3104

**RE: International Paper-Savannah 2025 Annual Report for EPA's Data Requirements Rule for the 2010 1-Hour SO<sub>2</sub> NAAQS**

Dear Mr. McOmber:

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 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 Georgia EPD, which demonstrated that SO<sub>2</sub> emissions from IP Savannah 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 66 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 modeled IP Savannah SO<sub>2</sub> emissions (2011-2013) along with IP Savannah SO<sub>2</sub> emissions (2011-2023) from EPA's Emission Inventory System (EIS).

**Table 1. SO<sub>2</sub> emissions from IP Savannah for 2011-2023.**

Calendar Year	EIS SO <sub>2</sub> Emissions (Tons/Year)	Modeled SO <sub>2</sub> 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	
2021	4,365	
2022	3,929	
2023	3,979	

The increase of facility-wide SO<sub>2</sub> emissions (50 TPY) at IP Savannah in 2024 compared to the facility-wide SO<sub>2</sub> emissions in 2023 was primarily due to an increased demand of 1.4% on the Power Boiler #13 (PB13) that fires non-condensable gas (NCG) from the pulping process. NCG fired on PB13 was 882,009 tons in 2022 and 894,068 tons in 2023.

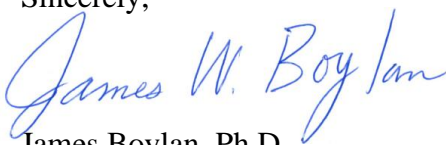
The 3-year average of IP Savannah SO<sub>2</sub> emissions modeled for 2011-2013 was 6,658 TPY. The 3-year average of SO<sub>2</sub> emissions from IP Savannah for 2021-2023 was 4,091 TPY which is 38.6 percent lower than the modeled emissions for 2011-2013. Therefore, EPD has determined that the previous modeling is conservative, no additional modeling is needed to characterize air quality in the area, and the area continues to meet the 2010 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-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 Elisabeth Munsey at [Elisabeth.Munsey@dnr.ga.gov](mailto:Elisabeth.Munsey@dnr.ga.gov) or 470-251-4736.

Sincerely,



James Boylan, Ph.D.  
Chief, Air Protection Branch  
Georgia Environmental Protection Division