



## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**EPD Director's Office**

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07/01/2020

Ms. Mary S. Walker  
Regional Administrator  
U.S. EPA, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

**RE: Section 182(a)(1) Emissions Inventory SIP Requirement  
Section 172(c)(5) and Section 173 Permit Program Requirements  
Section 182(a)(3)(B) Emissions Statement Requirement**

Dear Ms. Walker:

With this letter, the Georgia Environmental Protection Division (EPD) is submitting for approval and incorporation a proposed revision to Georgia's State Implementation Plan (SIP). This revision includes an emissions inventory that is consistent with §182(a)(1) of the Clean Air Act (CAA) for the 7-county Atlanta Nonattainment Area for the 2015 Ozone National Ambient Air Quality Standard (NAAQS). The 2015 Ozone NAAQS was published as a final rule in the Federal Register by EPA on October 26, 2015 [80 FR 65292]. As part of this revision, EPD is submitting certification that existing Georgia Rules for Air Quality Control (Georgia Rules) satisfy the Permit Program requirements found in §172(c)(5) and §173 of the CAA. EPD is also providing a written commitment to take action to meet the Emissions Statement requirement located in §182(a)(3)(B) of the CAA.

Section 182(a)(1) of the CAA requires States to submit a comprehensive, accurate, current inventory of actual emissions from all sources, as described in §172(c)(3), in accordance with guidance provided by the Administrator. Section 172(c)(3) states "Such plan provisions shall include a comprehensive, accurate, current inventory of actual emissions from all sources of the relevant pollutant or pollutants in such area, including such periodic revisions as the Administrator may determine necessary to assure that the requirements of this part are met."

The attached inventory has been prepared consistent with 83 FR 62998, "Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements," and 40 CFR Part 51.1315.

Section 172(c)(5) of the CAA requires permits for the construction and operation of new or modified major stationary sources anywhere in the nonattainment area, in accordance with §173 of the CAA. EPD certifies that existing Georgia Rule 391-3-1-.03(8), "Permit Requirements," meets the requirements of §172(c)(5) and §173 for the 7-county Atlanta Nonattainment Area for the 2015 Ozone NAAQS. This submittal also meets the requirements of 40 CFR 51.1314.

Section 182(a)(3)(B) of the CAA requires areas classified as Marginal and above to include in their SIP a requirement for stationary sources of nitrogen oxides (NOx) and volatile organic compounds (VOC) to provide the state with a statement annually showing actual annual

emissions of NO<sub>x</sub> and VOC. With this letter, EPD is also providing a written commitment under section 110(k)(4) of the CAA to revise Georgia Rule 391-3-1-.02(6)(a)4.(iii) so that emissions reporting is also required for sources that emit exactly 25 tons of VOC or NO<sub>x</sub> per calendar year and that a waiver is only allowed for sources that emit less than 25 tons per calendar year. EPD commits to adopt this rule revision no later than one year after EPA's conditional approval of Georgia's Emission Statements requirement certification. EPD's anticipated schedule for the rule revision is as follows:

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| • Department of Natural Resources Board Briefing | March 2021    |
| • Public Hearing and Public Comment Period       | April 2021    |
| • Department of Natural Resources Board Action   | June 2021     |
| • EPA Submittal                                  | December 2021 |

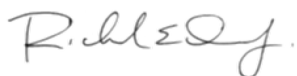
EPD certifies that with the rule revisions mentioned in this letter, Georgia Rule 391-3-1-.02(6)(a)4., "Emission Statements," will meet the requirement of §182(a)(3)(B) for the 7-county Atlanta Nonattainment Area for 2015 Ozone NAAQS.

The public notice for this revision to Georgia's SIP was published via GovDelivery.com on May 11, 2020. A public hearing for the proposed revision was held on June 11, 2020. The public comment period ended on June 18, 2020. No comments were received during the public comment period or at the public hearing. A certification that the required public notice was provided and that a public hearing was held is enclosed.

As required by the federal SIP-processing regulations, we have enclosed the administrative materials and technical support checklists to satisfy the SIP submittal completeness criteria requirements. This revision is being submitted via EPA's State Planning Electronic Collaboration System (SPeCS) with the exception of Appendix A - Appendix E due to the size limitations in SPeCS. Instead, Appendix A - Appendix E will be delivered in CD form by U.S. Postal Service.

We look forward to your review and approval of this revision. Should you or your staff have any questions, please feel free to contact James Boylan at [James.Boylan@dnr.ga.gov](mailto:James.Boylan@dnr.ga.gov) or (404) 363-7014.

Sincerely,



Richard E. Dunn  
Director

RED:TH  
Enclosures

c: Lynorae Benjamin, EPA Region 4  
Scott Davis, EPA Region 4  
Pearlene Williams, EPA Region 4  
Karen Hays, Branch Chief, EPD Air Protection Branch