

Georgia Department of Natural Resources **Environmental Protection Division**

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Judson H. Turner, Director
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SEP 17 2015

Ms. Heather McTeer Toney
Regional Administrator
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Re: Georgia's Recommendations for SO₂ Nonattainment Areas Near the Lathrop & Augusta SO₂ Monitor in Chatham County

Dear Ms. McTeer Toney:

On June 2, 2010, the U.S. Environmental Protection Agency (EPA) revised the primary national ambient air quality standards (NAAQS) for sulfur dioxide (SO₂) by establishing a new 1-hour standard at a level of 75 parts per billion (ppb). EPA is required to conduct an expedited round of SO₂ attainment status designations by July 2, 2016 as a result of the consent decree between the EPA and Sierra Club and the Natural Resources Defense Council. Based on this schedule, states are required to provide recommendations and supporting information to EPA for this round of designations by September 18, 2015. The expedited round of designations are categorized into two groups: (1) areas that have newly monitored violations and (2) areas that contain any stationary source, not announced for retirement, that emitted more than 16,000 tons of SO₂, or emitted more than 2,600 tons of SO₂ and had a emission rate greater than 0.45 lbs/MMbtu in 2012.

The Lathrop & Augusta SO₂ monitor (13-051-1002) currently has a 2012-2014 design value of 78 ppb which is above the NAAQS level of 75 ppb. Therefore, the area surrounding this monitor has been identified for early designation. The Lathrop & Augusta SO₂ monitor is located in Savannah, GA (Chatham County).

Previous air quality modeling and back trajectory analysis by Georgia EPD clearly showed that International Paper - Savannah Mill (IP-Savannah) was the only significant SO₂ source contributing to exceedances of the NAAQS. Therefore, IP-Savannah submitted a dispersion modeling report and related modeling files prepared by AECOM, Inc. to support this early designation. Georgia EPD has reviewed the modeling report and files to ensure that the dispersion modeling has been conducted in accordance with the final Data Requirements Rule (DRR) and Modeling Technical Assistance Document (TAD) using the most recently available information. Based on this review, Georgia EPD made some adjustments to the modeling files that were submitted to insure the most reliable results were used in the analysis.

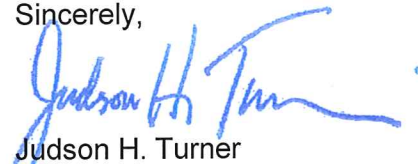
Based on the final modeling analysis, SO₂ emissions from IP-Savannah do not lead to any violations of the 1-hour SO₂ NAAQS. However, the modeling does indicate that SO₂ emissions from IP-Savannah can cause exceedances of the NAAQS. Since the Lathrop & Augusta SO₂ monitor is currently violating the NAAQS and IP-Savannah is the only significant SO₂ source contributing to exceedances of the NAAQS, GA EPD recommends that the land parcel including the IP-Savannah main mill and the area surrounding the Lathrop & Augusta SO₂ monitor (Jasper Spring Park) be designated nonattainment. Specifically, GA EPD recommends the following nonattainment area:

- The area of land bounded by the following description: south of the Savannah River, and east of Allen Blvd. and east of the western most part of Chip Mill Loop Road, and north of I-516, and west of the Seaboard Air Line Railway track extended to the Savannah River; and
- The area of land bounded by the following description: south of Augusta Avenue, and east of Old W. Lathrop Avenue, and north of Stratford Street, and east of the US-80/I-516 southbound entrance ramp.

Georgia EPD has demonstrated that the current location of the Lathrop & Augusta SO₂ monitor (13-051-1002) is representative of maximum SO₂ impacts. In early 2015, IP-Savannah changed from burning coal in the power boiler to burning natural gas (resulting in a 50% decrease in SO₂ emissions from IP-Savannah); therefore, it is very likely that this monitor will have a 2013-2015 design value which is below the NAAQS level of 75 ppb. Thus far in 2015, the 1st high SO₂ value is 58 ppb and the 4th high SO₂ value is 35 ppb. If the 99th percentile 1-hour SO₂ maximum daily SO₂ concentration at the Lathrop & Augusta monitor is at or below 66 ppb, the 2013-2015 design value will not violate the NAAQS level of 75 ppb. In this case, Georgia EPD will early certify the SO₂ data at this monitor and immediately update our SO₂ designation recommendation from nonattainment to unclassifiable/attainment.

Should you or your staff have any questions, please feel free to contact James Boylan at (404) 363-7014.

Sincerely,



Judson H. Turner
Director

JHT:JB

c: Lynorae Benjamin, EPA Region 4
Karen Hays, Branch Chief, EPD Air Protection Branch

Attachments