



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

August 26, 2009

Mr. James P. Johnston  
Program Manager, Planning and Support Program  
Georgia Department of Natural Resources  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

Dear Mr. Johnston:

The Region 4 Office of the Environmental Protection Agency (EPA) received the prehearing submittal, dated July 23, 2009, proposing revisions to the Georgia State Implementation Plan (SIP), to incorporate the Regional Haze Plan. We have completed our review and have substantive comments regarding the enforceable emissions limits in the SIP, the Georgia Pacific Cedar Springs Best Available Retrofit Technology (BART) Exemption Determination, and the Interstate Paper BART Determination. Additional comments are included in the enclosure.

**Enforceable Emissions Limits in the SIP:**

Please submit the relevant portions of the final permits addressed in Appendix M as a SIP revision, along with the dates the provisions are officially adopted by and effective in the State, to provide the emission limits in a state-enforceable mechanism that will enable the Agency to take final action on Georgia's SIP.

**Georgia Pacific Cedar Springs BART Exemption Determination:**

EPA is concerned with the compliance date for the Georgia Pacific Cedar Springs BART exemption of July 30, 2011. Since a BART exemption avoids the need for an actual determination, generally we would expect a source seeking exemption from BART to have reduced its impacts to below the significance level by the date the final Regional Haze SIP is submitted. Please provide your reasoning for concluding that extending the date for the BART exemption to July 30, 2011, was appropriate in this instance and how the conclusions of the BART analysis, if one had been done, might differ from the conclusions of the reasonable progress analysis.

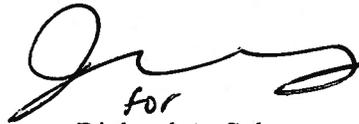
**BART Analysis for Interstate Paper:**

The cost of nitrogen oxides (NO<sub>x</sub>) controls presented for the power boiler and lime kiln are well within the range of what has been found to be reasonable for many other sources. If your BART determination is based in part on the lack of further effectiveness of NO<sub>x</sub> controls in

reducing regional haze in the impacted Federal Class I areas, Region 4 recommends you prepare an air quality analysis assessing the change in deciviews expected from further NO<sub>x</sub> control to better document your findings.

If you have any questions, please contact me or have your staff contact Stacy Harder at (404) 562-9042.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Schutt', written in a cursive style.

for  
Richard A. Schutt  
Chief  
Air Planning Branch

Enclosure

## Comments on Georgia's July 23, 2009, Prehearing Regional Haze SIP

**I. Key Comments:** The following comments must be addressed in the SIP to meet the requirements of the regional haze regulations and/or SIP completeness and approvability criteria.

### **1. Enforceable Emissions Limits in the SIP:**

Appendix M contains permit conditions for emission units at four facilities to satisfy the State's determination of Best Available Retrofit Technology (BART) and/or reasonable progress: Interstate Paper-Riceboro (BART), GA Pacific Brunswick Cellulose (reasonable progress), International Paper-Savannah (reasonable progress), GA Pacific Cedar Springs (reasonable progress and BART exemption limit). Enforceable emission limits and compliance schedules are required to be in the SIP per 40 CFR Part 51.308(d)(3) for reasonable progress, and 40 CFR Part 51.308(e) for BART. Emission control measures adopted into the State Implementation Plan (SIP) as federally enforceable must be enforceable by the State. In this document, the proposed emission limits and compliance schedules do not appear to be in a form that the State can enforce.

We understand that the State is in the process of incorporating these emissions limits and supporting conditions into permits for the affected facilities, and that the permit processes will likely be completed after the final SIP is submitted. Please submit the relevant portions of the final permits as a SIP revision, along with the dates the provisions are officially adopted by and effective in the State, to include with the State's Regional Haze SIP. Providing the emission limits in a state-enforceable mechanism will enable the Agency to take final action on Georgia's SIP, making the Regional Haze SIP revisions federally enforceable. Also, it would be helpful if the State could indicate its estimated schedule for these source-specific SIP submissions.

If the State has the authority and intends to rely on enforcement of the proposed emission limits and compliance schedules as presented in the SIP, please submit evidence that the State has the necessary legal authority under State law to adopt and implement the State's Regional Haze SIP, including the emission limits for BART and reasonable progress listed in narrative form in Appendix M.

### **2. Georgia Pacific Cedar Springs BART Exemption Determination:**

Georgia Pacific Cedar Springs was exempted from BART because the facility accepted SO<sub>2</sub> emissions limits on Power Boilers 1 and 2 (135 lb/hr each) and on Recovery Boiler 3 (350 ppm). These limits result in a 0.499 deciview impact at St. Marks and a 0.306 deciview impact at Okefenokee National Wildlife Refuges (NWR). The BART exemption limits will result in over 70 percent control of the two power boilers. The permit has been issued with Federally-enforceable limits and a Federally-enforceable condition that requires the facility to monitor their emissions and to notify the State if they exceed the BART exemption limit. The compliance date for these exemption limits is July 30, 2011.

We also note that a four-factor analysis was performed for reasonable progress for this facility. It concluded that adding caustic to the existing venturi scrubber or in-duct sorbent injection was reasonably cost effective and, depending on the level of caustic injected, would result in 37–79 percent reduction in SO<sub>2</sub> from the power boilers. No controls were identified as being reasonably available for the recovery boiler. On this basis, GA EPD concluded that the BART exemption limits, which will achieve greater than 70 percent SO<sub>2</sub> reduction, were sufficient for reasonable progress for this facility.

EPA is concerned with the compliance date of July 30, 2011. Although we have not directly addressed this issue in a rulemaking context, generally we would expect a source seeking exemption from BART to have reduced its impacts to below the significance level, or for the State to include a BART determination for the currently BART-eligible source in its Regional Haze SIP submitted to EPA as required by 51.308(e). We recognize that if this were a BART determination, the date selected would likely be considered acceptable and as expeditiously as practicable. However a BART exemption avoids the need for an actual determination and is subject to different considerations.

Please provide your reasoning for concluding that extending the date for the BART exemption to July 30, 2011, was appropriate in this instance and how the conclusions of the BART analysis, if one had been done, might differ from the conclusions of the reasonable progress analysis.

### **3. Appendix H.8--BART Analysis for Interstate Paper:**

The cost of NO<sub>x</sub> controls presented for the power boiler and lime kiln are well within the range of what has been found to be reasonable for many other sources. If your BART determination is based in part on the lack of further effectiveness of NO<sub>x</sub> controls in reducing Regional Haze in the impacted Federal Class I areas, Region 4 recommends you prepare an air quality analysis assessing the change in deciviews expected from further NO<sub>x</sub> control to better document your findings.

**II. Suggested Clarifications:** The following comments are suggested clarifications that would be helpful to more clearly portray the information presented.

#### **SIP Narrative – Main Report:**

- 1. Page ii of Executive Summary and page 12 - Best/Worst Visibility Days:** Please note on page ii of the Executive Summary and page 12 of the SIP Narrative the location of a list for the 20 percent best and worst days used in the regional haze technical analyses for the Georgia Class I areas.
- 2. Page 13 - Table 2.3.1. Natural Background and Baseline Conditions for Georgia Class 1 Areas:** The second column under the “Natural Background Conditions” header is labeled as “Average for 20 percent **Best** Days (deciviews).” This should be changed to “Average for 20 percent **Worst** Days (deciviews).”

3. **Page 81 - EPA Reasonable Progress Guidance:** For clarity, we suggest that the reference to “EPA Guidance” on page 81 be specified with the page from the Guidance describing the concept of allowing a BART control analysis to satisfy a reasonable progress control analysis (i.e., pp. 4-2 to 4-3).
4. **Page 87 - Georgia Power, Plant Kraft, Steam Generators 1, 2, and 3:** The following statement appears on page 87 of the SIP Narrative: “Coal washing was relatively cost effective (\$1839 to \$1847/ton and \$32.5 to \$32.7/Mm-1) but the control efficiency is only 6%. Based on these factors, no additional controls will be required for any of the Plant Kraft Units.” It is suggested that the additional discussion of the negative non-air environmental impacts of the coal washing option, discussed on page 88 of Appendix H, be added to the summary in the SIP narrative to provide further support for the conclusion that coal washing is not reasonable.
5. **Pages 89, 90 - International Paper, Savannah, Power Boiler 13:** The discussion on pages 89-90 of the SIP Narrative indicates that International Paper requested a 2016 compliance date for meeting the revised SO<sub>2</sub> emission limit of 6578 tons/yr and that GA EPD has agreed that this is appropriate. The discussion of the rationale supporting the 2016 compliance date is limited in the SIP Narrative, but more detail is provided on page 94 of Appendix H. It is suggested that the discussion in Appendix H regarding EPA’s timeline for revising the vacated and remanded Boiler MACT rule be included in the SIP Narrative as well to support such a delayed compliance date.
6. **Page 91 - Temple-Inland Rome Linerboard, No. 4 Power Boiler:** On page 91, the SIP indicates that “None of the control options considered had a cost effectiveness that was determined reasonable at this time.” However, the cost effectiveness information presented on pages 97-98 of Appendix H indicates that the costs are within the range of costs which were deemed to be reasonable for other sources being controlled for reasonable progress (e.g., GA Pacific Brunswick Cellulose and GA Pacific Cedar Springs). The discussion starting on page 95 of Appendix H appears to rely on the air quality impacts of the reasonable progress determination. Additional rationale, clarifying the reliance on the impacts on visibility, should be provided in the SIP Narrative.
7. **Page 97 -** The State separately submitted emissions limits in issued permit amendments that facilities have taken to be exempt from performing four-factor analyses. The permit conditions in Table 7.6.4-2 for Rayonier Performance Fibers do not appear to include the compliance date of January 1, 2012, for exemption from reasonable progress analysis.
8. **Page 109 - Smoke Management Plan (SMP):** Consider inserting into the Section 7.6 discussion of Georgia’s SMP how the plan can be viewed by interested parties.

## Appendices:

### 1. Appendix H:

**a. Tables 7-1 and 7-2 - Best Available Retrofit Technology (BART):**

Table 7-1 on page 103 in Appendix H does not provide distances to the applicable Class I areas for Georgia Power - Plant Bowen, Prayon and Georgia Pacific-Cedar Springs.

Table 7-2 on page 109 in Appendix H states that a PCS Phosphate facility is a major Georgia ammonia BART source that is 31 kilometers (km) from an unspecified Class I area. We assume that this source is the PCS Phosphate Savannah Ammonia Terminal in Savannah, Georgia. We also assume that it must be close to the Wolf Island Class I area. Please clarify that the facility does not have other BART pollutants that make it BART-eligible.

**b. Table 5-7, page 57 - Reasonable Progress:**

**Mohawk Industries:** Table 5-7 on page 57 of Appendix H lists Mohawk Industries as a facility that was dropped from further analysis because the facility updated their 2018 emission information, lowering sulfate visibility impact to less than 0.5 percent. This is similar to Miller Brewing, Mount Vernon Mills, and Savannah Sugar, which are shown in Tables 7.6.2-1 and 7.6.2-2 on pages 80 and 81 of the narrative. Previously this facility was classified as having shut down. Please clarify the status of this facility and update the appropriate tables and text.

**c. Page 56 - Inland Paperboard I Packaging:** Please address the permit status in the discussion on page 56 of Appendix H for the permanent shutdown of the Temple Inland Rome (aka Inland Paperboard I Packaging Inc.) facility's Unit F2.

**e.** Insert "limit" into fourth column for point ID "SA02."

### 2. Appendix J:

**a. Pages J-7, J-8:** There are several sources that were identified through different methods as being eligible for a four-factor reasonable progress control analysis that did not overlap between the States of Georgia and Florida. Please list each of these emission units and state how the two States resolved the approach to addressing Florida emission units identified by Georgia's method (and the Georgia emission units identified by Florida's method).

**b. Page 3:** The table of contents on page 3 under "2. Consultation Letters" is very helpful. Note that there are several discrepancies in the last few entries listed from pages 50-55 in comparison to the referenced letters.