Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, S.E., Suite 1152 East Tower, Atlanta, Georgia 30334-9000
Lonice C. Barrett, Commissioner
Harold F. Reheis, Director
Environmental Protection Division
404/656-4713

July 15, 2003

Mr. James I. Palmer, Jr.
Regional Administrator
U.S. EPA, Region I61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Dear Mr. Palmer:

The United States Environmental Protection Agency (EPA) has promulgated a new 8-hour ozone National Ambient Air Quality Standard. Section 107(d)(1) of the Clean Air Act requires each State to submit to the EPA its recommended designation of each area of the State as attainment/unclassifiable or nonattainment under the standard. The Georgia Environmental Protection Division has developed recommended designations in accordance with EPA's memorandum dated March 28, 2000, "Boundary Guidance on Air Quality Designations for the 8-Hour Ozone National Ambient Air Quality Standard," as well as other, more recent guidance.

The attached table provides the Georgia EPD's recommendations for the designation status of each county in Georgia. It is recommended that 20 counties in metropolitan Atlanta and three counties outside metropolitan Atlanta be designated as nonattainment.

Modeling conducted by the EPA and Georgia Tech indicates that the Augusta and Macon areas should attain the 8-hour ozone standard after implementation of the regional nitrogen oxide emission reductions and new federal vehicle and fuel standards, without the need for additional local control measures. In light of this modeling we are recommending that only the counties in those areas having ozone monitors showing violations of the standard (Richmond and Bibb Counties) be designated nonattainment. In addition, a monitor located within a federal Class I area in Murray County has shown violation of the standard. In accordance with recent EPA proposed guidance regarding rural transport of ozone, we are recommending only that portion of Murray County comprising the Class I area be designated nonattainment.

Please contact Ron Methier at (404) 363-7016 should you have any questions regarding this matter.

Sincerely,

Harold F. Reheis
Director

HFR:dks

Attachment

cc: Ron Methier, Chief
Air Protection Branch

RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES

County Name	Designation
Appling	Attainment
Atkinson	Attainment
Bacon	Attainment
Baker	Attainment
Baldwin	Attainment
Banks	Attainment
Barrow	Nonattainment
Bartow	Nonattainment
Ben Hill	Attainment
Berrien	Attainment
Bibb	Nonattainment
Bleckley	Attainment
Brantley	Attainment
Brooks	Attainment
Bryan	Attainment
Bulloch	Attainment
Burke	Attainment
Butts	Attainment
Calhoun	Attainment
Camden	Attainment
Candler	Attainment
Carroll	Nonattainment
Catoosa	Attainment
Charlton	Attainment
Chatham	Attainment
Chattahoochee	Attainment
Chattooga	Attainment
Cherokee	Nonattainment
Clarke	Attainment
Clay	Attainment
Clayton	Nonattainment
Clinch	Attainment
Cobb	Nonattainment
Coffee	Attainment
Colquitt	Attainment
Columbia	Attainment
Cook	Attainment
Coweta	Nonattainment
Crawford	Attainment
Crisp	Attainment
Dade	Attainment
Dawson	Attainment

RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES

County Name	Designation
Decatur	Attainment
DeKalb	Nonattainment
Dodge	Attainment
Dooly	Attainment
Doughtery	Attainment
Douglas	Nonattainment
Early	Attainment
Echols	Attainment
Effingham	Attainment
Elbert	Attainment
Emanuel	Attainment
Evans	Attainment
Fannin	Attainment
Fayette	Nonattainment
Floyd	Attainment
Forsyth	Nonattainment
Franklin	Attainment
Fulton	Nonattainment
Gilmer	Attainment
Glascock	Attainment
Glynn	Attainment
Gordon	Attainment
Grady	Attainment
Greene	Attainment
Gwinnett	Nonattainment
Habersham	Attainment
Hall	Nonattainment
Hancock	Attainment
Haralson	Attainment
Harris	Attainment
Hart	Attainment
Heard	Attainment
Henry	Nonattainment
Houston	Attainment
Irwin	Attainment
Jackson	Attainment
Jasper	Attainment
Jeff Davis	Attainment
Jefferson	Attainment
Jenkins	Attainment
Johnson	Attainment
Jones	Attainment

RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES

County Name	Designation
Lamar	Attainment
Lanier	Attainment
Laurens	Attainment
Lee	Attainment
Liberty	Attainment
Lincoln	Attainment
Long	Attainment
Lowndes	Attainment
Lumpkin	Attainment
McDuffie	Attainment
McIntosh	Attainment
Macon	Attainment
Madison	Attainment
Marion	Attainment
Meriwether	Attainment
Miller	Attainment
Mitchell	Attainment
Monroe	Attainment
Montgomery	Attainment
Morgan	Attainment
Murray	Attainment, except for that portion in the Class I area
Muscogee	Attainment
Newton	Nonattainment
Oconee	Attainment
Oglethorpe	Attainment
Paulding	Nonattainment
Peach	Attainment
Pickens	Attainment
Pierce	Attainment
Pike	Attainment
Polk	Attainment
Pulaski	Attainment
Putnam	Attainment
Quitman	Attainment
Rabun	Attainment
Randolph	Attainment
Richmond	Nonattainment
Rockdale	Nonattainment
Schley	Attainment
Screven	Attainment
Seminole	Attainment
Spalding	Nonattainment

RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES

County Name	Designation
Stephens	Attainment
Stewart	Attainment
Sumter	Attainment
Talbot	Attainment
Taliaferro	Attainment
Tattnall	Attainment
Taylor	Attainment
Telfair	Attainment
Terrell	Attainment
Thomas	Attainment
Tift	Attainment
Toombs	Attainment
Towns	Attainment
Treutlen	Attainment
Troup	Attainment
Turner	Attainment
Twiggs	Attainment
Union	Attainment
Upson	Attainment
Walker	Attainment
Walton	Nonattainment
Ware	Attainment
Warren	Attainment
Washington	Attainment
Wayne	Attainment
Webster	Attainment
Wheeler	Attainment
White	Attainment
Whitfield	Attainment
Wilcox	Attainment
Wilkes	Attainment
Wilkinson	Attainment
Worth	Attainment

Georgia Department of Natural Resources
Environmental Protection Division, Air Protection Branch
4244 International Parkway, Suite 120, Atlanta, Georgia 30354
Phone: 404/363-7000; Fax: 404/363-7100
Lonice C. Barrett, Commissioner
David M. Word, Assistant Director

July 17, 2003

Ms. Kay Prince
Chief, Air Planning Branch
Air, Pesticides & Toxics Management Division
U.S. EPA, Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8909

Re: Recommendations for Nonattainment Designations Under the 8-Hour Ozone NAAQS

Dear Ms. Prince:

Our July 15, 2003, submittal contains Georgia EPD's recommendations for the designation status of each county in Georgia under the 8-hour ozone standard. As indicated in that letter, we have recommended the following 8-hour ozone nonattainment areas:

- Atlanta area to include Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Henry, Newton, Paulding, Rockdale, Spalding and Walton Counties;
- Macon area to include Bibb County;
- Augusta area to include Richmond County; and
- Fort Mountain area to include that portion of Murray County, which contains the federal Class 1 Cohutta Wilderness Area.

With this letter we are supplying additional information regarding the selection methodology used to arrive at the aforementioned recommendations. These recommendations were developed in accordance with the boundary guidance provided by the U.S. EPA. The attached memo, dated July 15, 2003, provides the background information on the nonattainment designation process, including the Georgia counties that were evaluated for nonattainment designation, the selection criteria used to evaluate those counties, and the application of those criteria in making the final nonattainment designations. The memo explains how each of the selection criteria used address one or more of the recommended eleven selection criteria contained in EPA's nonattainment designation guidance. It is our hope that this information will aid EPA in reviewing and approving EPD's recommendations for the designations.

If you have any questions or need more information, please contact me at (404) 363-7016.

Sincerely,

Ron Methier
Chief, Air Protection Branch

Attachment

Georgia Department of Natural Resources
Environmental Protection Division, Air Protection Branch
4244 International Parkway, Suite 120, Atlanta, Georgia 30354
Phone: 404/363-7000; Fax: 404/363-7100
Lonice C. Barrett, Commissioner
Harold F. Reheis, Director

July 15, 2003

MEMORANDUM

TO: Harold Reheis

FROM: Ron Methier

SUBJECT: Nonattainment Area Designations under the 8-hour Ozone Standard

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Background

As required under section 107(d)(1)(A) of the Clean Air Act (CAA), the Governor must submit to the U.S. Environmental Protection Agency (EPA) by July 15, 2003, a list initially designating each area of the State as nonattainment, attainment or unclassifiable with respect to the new 8-hour National Ambient Air Quality Standard for ozone. By no later than April 15, 2004, the EPA Administrator will promulgate the designation of each area of the State by Final Rule and notice in the Federal Register. As provided under section 107(d)(1)(B) of the CAA, the Administrator may modify, as he deems necessary, the initial area designations and/or area boundaries submitted by the Governor.

The Air Protection Branch has reviewed guidance provided by the EPA as well as pertinent, available data to develop criteria for assigning area designations and boundaries. The EPA's March 28, 2000, memorandum "Boundary Guidance on Air Quality Designations for the 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)" enunciates the EPA's position that any monitored violation of the standard within a Metropolitan Statistical Area (MSA) should, as an initial presumption, cause that entire MSA to be considered for designation as nonattainment:

"The EPA believes that any county with an ozone monitor showing a violation of the NAAQS and any nearby contributing area needs to be designated as nonattainment. In reducing ozone concentrations above the NAAQS, EPA believes it is best to consider controls on sources over a larger area due to the pervasive nature of ground level ozone and transport of ozone and its precursors. Thus, EPA recommends that the Metropolitan Statistical Area or the Consolidated Metropolitan Statistical Area (C/MSA) serve as the presumptive boundary for 8-hour NAAQS nonattainment areas. We believe this approach will best ensure public health protection from the adverse effects of ozone pollution caused by population density, traffic and commuting patterns, commercial development, and area growth."

As a result, the starting point for evaluation of nonattainment area boundaries should be the entire C/MSA if any monitor located within a C/MSA shows a violation of the 8-hour ozone NAAQS. In Georgia, monitors showing violations of the 8-hour ozone NAAQS are located in 10 counties within the Atlanta C/MSA (Cobb, Coweta, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Henry, Paulding and Rockdale), in Richmond County within the Augusta-Aiken C/MSA and in Bibb County within the Macon C/MSA. Accordingly, the entire Atlanta, Augusta-Aiken and Macon C/MSAs comprise three potential nonattainment area boundaries. The counties included in these three C/MSAs are shown on the map "Consolidated Metropolitan Statistical Areas for Atlanta, Augusta and Macon" (Attachment A). In the case of Atlanta, controls have been placed in the existing 13-county 1-hour ozone nonattainment area as well as the surrounding 32-counties to attain the old 1-hour ozone standard. Hence, the starting point for Atlanta includes

these 45-counties, shown on the map "Atlanta's Area of Influence under the 1-hour Ozone Standard" (Attachment B).

The March 28 memorandum lists the following factors that should be addressed if a State seeks to propose nonattainment area boundaries larger or smaller than the Consolidated Metropolitan Statistical Areas (C/MSAs):

a. Emissions and air quality in adjacent areas
b. Population density and degree of urbanization
c. Monitoring data representing ozone concentrations in local areas and larger areas
d. Location of emission sources
e. Traffic and commuting patterns
f. Expected growth
g. Meteorology
h. Geography/topography
i. Jurisdictional boundaries
j. Level of control of emission sources
k. Regional emission reductions

In order to address these factors we have obtained and reviewed the following data:

- Quality assured ozone monitoring data from each of the sites operated by our Ambient Monitoring Program.
- County by county NO_x and VOC emissions during CY 1999, compiled using the best available data from Georgia's 1999 Emissions Inventory, Georgia Tech's 1999 modeling inventories for Atlanta, Augusta and Macon, and EPA's 1999 National Emissions Inventory.
- Projected county-by-county NO_x and VOC emissions for CY 2007 based on application of EPA's EGAS projection model to the 1999 county-by-county NO_x and VOC emissions compiled as described above.
- 1990 & 2000 census data, and Consolidated Metropolitan Statistical Area boundaries from the U.S. Census Bureau.
- Projected CY 2005 and CY 2010 population data from the Georgia Department of Labor as published in Georgia State University's "The Georgia County Guide."
- CY 2001 summer daily vehicle miles traveled (VMT) data (without interstates) from the Georgia Department of Transportation.

Development of Criteria

The above data were reviewed in light of the EPA's guidance factors and input received from other State agencies. This process resulted in development of a set of criteria for use in screening counties in and around the Atlanta, Augusta and Macon C/MSAs for inclusion within the proposed nonattainment area boundaries. Attachment C, "Determination of 8-hour Ozone Nonattainment Areas" contains data on various criteria for the counties under consideration. In addition to the screening criteria, there are two factors that mandate inclusion of a county in the nonattainment area:

1) If the data from a monitor in a county show a violation of the standard, that is an absolute indicator of nonattainment and the county must be designated nonattainment. The spreadsheet "Determination of 8-hour Ozone Nonattainment Areas in Georgia" indicates

those counties in which ozone monitors are located, and whether a monitor has documented a violation of the standard.

2) If a county is currently designated nonattainment under the 1-hour standard, it will be included in the 8-hour nonattainment area. As a result, all 13 counties in the existing Atlanta 1-hour ozone nonattainment area will be included in the new Atlanta 8-hour ozone nonattainment area.

The two factors listed above incorporate the air quality considerations of the EPA's guidance factors "a" and "c" related to air quality and monitoring data, as well as local and regional emission controls already in place (for the 1-hour standard) which relate to guidance factors "j" and "k".

The screening criteria and rationale for their application are presented below.

Criterion 1: Projected 2007 population density exceeding the minimum value that corresponds to a monitored violation within a C/MSA. This criterion addresses guidance factors "b" and "f". To the extent that ozone precursor emissions are a function of human activity, population density of a county may serve as a reasonable indicator that activities within the county contribute to overall nonattainment within the C/MSA. The threshold value for this criterion has been selected as the population density below which no monitored violation of the 8-hour standard has occurred (an exception is Murray County, which is discussed below). The 2007 projected population of each county was interpolated using values for four years: U.S. Census Bureau data for years 1990 and 2000, and projected 2005 and 2010 data from the Georgia Department of Labor as published in Georgia State University's "The Georgia County Guide." As indicated in the spreadsheet "Determination of 8-hour Ozone Nonattainment Areas in Georgia," the county with the lowest measured population density, which has a violating monitor, is Coweta County, with a (2000 census) population density of 204 persons per square mile. Accordingly, a county with a projected 2007 population density equal to or greater than 204 persons per square mile would satisfy this criterion for inclusion in its C/MSAs nonattainment area.

Criterion 2: Projected 2007 NO_x <u>or</u> VOC emissions density exceeding the minimum value that corresponds to a known monitored violation within a C/MSA. As NO_x and VOC are precursors to ozone formation, the more NO_x or VOC emitted in a county the greater the contribution to the nonattainment problem. This criterion reflects the normalized (by land area) level of precursor emissions (per guidance factors "a", "d", "f," "h" and "i") as well as those emission controls and emission reductions already in place (per guidance factors j and k). Correlation of county-by-county 1999 emissions data to monitored violations of the 8-hour standard reveals that Paulding County has had the lowest NO_x emissions density (8 tons per year per square mile) and Coweta County has had the lowest VOC emissions density (10 tons per year per square mile) of any counties having a violating monitor (excluding Murray County, which is discussed below). Any county having <u>either</u> a NO_x emissions density equal to or greater than 8 tons per year per square mile <u>or</u> a VOC emissions density equal to or greater than 10 tons per year per square mile would meet this criterion for nonattainment designation.

Criterion 3: Daily commuting trips (year 2000 basis) from a county into the nonattainment area exceeding the minimum number of daily in-commutes for an existing nonattainment county. This criterion addresses the commuting pattern aspect of guidance factor "e." For the Atlanta C/MSA, an "in-commute" represents a trip into one of the five nonattainment "core

counties" (Clayton, Cobb, DeKalb, Fulton and Gwinnett). For the Macon C/MSA, an in-commute is a trip into Bibb County. For the Augusta C/MSA, an in-commute is a trip into either Richmond County (Georgia) or Aiken County (South Carolina). Based on year 2000 data from the U.S. Census Bureau, the minimum number of daily in-commutes from a county currently designated nonattainment is 14,388 (from Rockdale County into the five Atlanta core counties). Any county with year 2000 daily in-commutes of 14,388 or greater would meet this criterion for nonattainment.

Criterion 4: Summer daily non-interstate vehicle miles traveled (VMT) exceeding the minimum summer daily non-interstate VMT for an existing nonattainment county (year 2001 basis). This criterion addresses the overall magnitude of a county's traffic per guidance factor "e." In order to minimize the effects of non-resident traffic, only non-interstate VMT are considered. Based on data from the Georgia Department of Transportation for the year 2001, Rockdale County had the minimum summer daily non-interstate VMT of any existing nonattainment county – 1,736,566 miles per day. Any county with summer daily non-interstate VMT of 1,736,556 miles per day would meet this criterion for nonattainment.

Application of Criteria

Any county within a nonattainment C/MSA (or, for Atlanta, within the 45 county "area of influence") would be included in the nonattainment area if it meets any two of the four screening criteria, unless there were compelling factors to override that determination. As indicated previously, the 13 Atlanta area counties (Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding and Rockdale) currently designated nonattainment under the 1-hour standard will be designated nonattainment for the 8-hour standard. In addition to the existing Atlanta area nonattainment counties, Bibb, Richmond and Murray Counties have monitors, which violate the 8-hour standard and must be designated nonattainment. As indicated on the attached spreadsheet "Determination of 8-hour Ozone Nonattainment Areas in Georgia," the following additional counties meet two or more screening criteria:

In the Atlanta C/MSA or 45-county area of influence – Barrow, Bartow, Carroll, Newton, Spalding, Walton, Hall, Clarke and Floyd.

In the Macon C/MSA – Houston.

In the Augusta-Aiken (SC) C/MSA – Columbia.

In the Chattanooga (TN) C/MSA – Catoosa and Whitfield.

(For the Columbus C/MSA, Muscogee County meets two criteria but there have been no monitored violations of the 8-hour standard in the C/MSA and therefore the area is in attainment.)

Additional Considerations

The U.S. EPA and Georgia Tech have performed ozone air quality modeling under the Fall-line Air Quality Study (FAQS) which indicates that Macon and Augusta should attain (and Columbus will continue to attain) the 8-hour ozone standard by 2007, after implementation of the NOx SIP Call and federal fuel and vehicle standards, with no additional local control measures required.

The EPA and Systems Application International (SAI) have also performed such modeling under the Arkansas–Tennessee–Mississippi Ozone study (ATMOS) for the Chattanooga, Tennessee area, with similar results. In addition, local governments in both the Chattanooga and Augusta areas have entered into Early Action Compacts with the EPA, committing to achieve attainment by no later than December 31, 2007. Because modeling indicates that the Chattanooga, Augusta and Macon areas will achieve attainment of the 8-hour ozone standard without the need for any new control measures, the Air Protection Branch concludes that designation of Catoosa, Whitfield, Houston and Columbia Counties as nonattainment is not warranted.

The monitor in Murray County is located at Fort Mountain in the federal Class I Cohutta Wilderness Area at a high elevation. Nonattainment found at this monitor undoubtedly results from regional ozone transport, as the county has no significant emission sources and meets none of the screening criteria. EPA's proposed rulemaking for implementation of the 8-hour standard acknowledges that rural nonattainment areas such as Cohutta are completely dependent upon control measures implemented at upwind emission sources for future attainment. As a result, the Air Protection Branch concludes that only the federal Class I Cohutta Wilderness Area within Murray County should be designated as nonattainment.

As indicated previously, Clarke County meets at least two of the screening criteria for nonattainment and is within Atlanta's 45-county area of influence. However, Clarke County has an ozone monitor which has not collected the required three years' data to indicate either attainment or nonattainment. Because Clarke County is the hub of a separate C/MSA and nonattainment has not been documented, the Air Protection Branch concludes that Clarke County should not be designated nonattainment at this time.

Floyd County meets two of the screening criteria and is within Atlanta's 45-county area of influence. As is the case with Clarke County, Floyd County is the hub of a separate C/MSA and nonattainment has not been documented. The Air Protection Branch concludes that Floyd County should not be designated nonattainment at this time.

Recommendation

The Air Protection Branch recommends the following areas be designated nonattainment for the 8-hour ozone standard:

Atlanta Nonattainment Area: Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Henry, Newton, Paulding, Rockdale, Spalding and Walton Counties.

Augusta Nonattainment Area: Richmond County

Macon Nonattainment Area: Bibb County

Fort Mountain Nonattainment Area: That portion of Murray County within the Cohutta Wilderness Class 1 Area

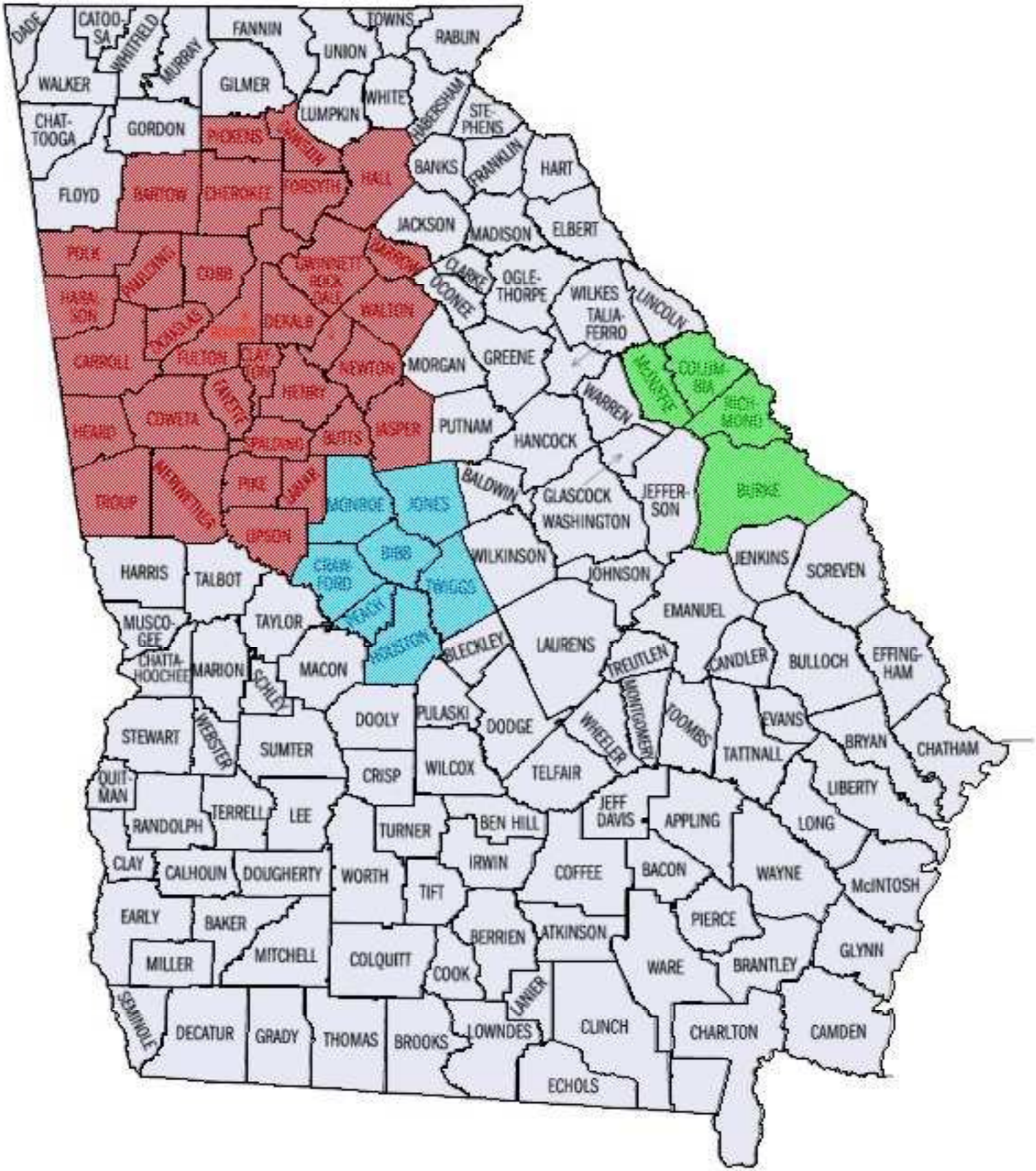
RCM:dks

Attachments

ATTACHMENT A

Consolidated Metropolitan Statistical Areas (C/MSAs) for Atlanta, Augusta and Macon

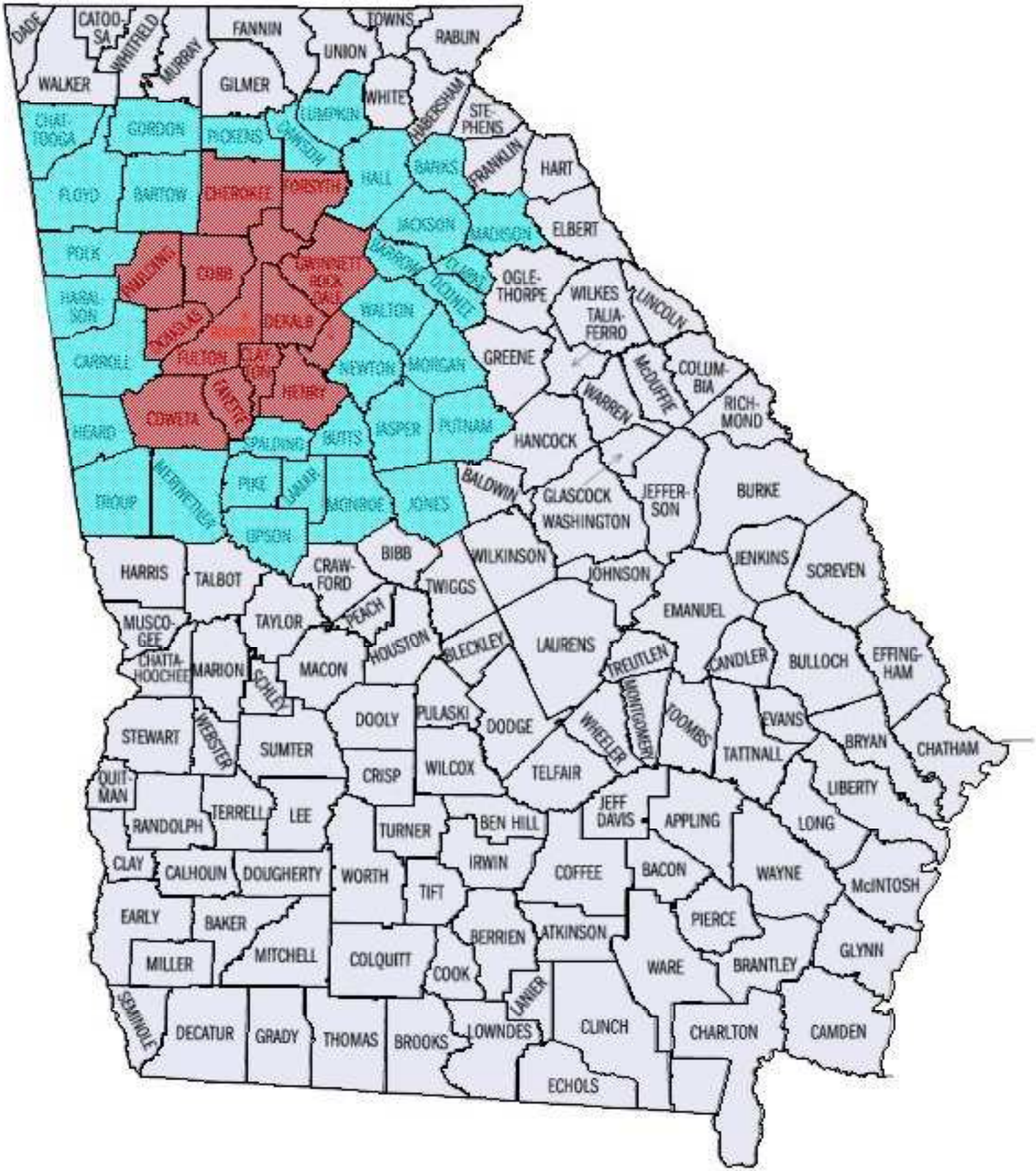
Source: U.S. Census Bureau's 2000 data on metropolitan, micropolitan, and combined statistical areas (CSAs) in Georgia.



ATTACHMENT B

Atlanta's Area of Influence under the 1-hour Ozone Standard

(13-County Nonattainment area + 32 Surrounding Counties)



ATTACHMENT C

Version date: July 15, 2003

Determination of 8-Hour Ozone Nonattainment Areas in Georgia

County Name	Monitor violates the 8-hour standard?	Criterion 1	Criterion 2		Criterion 3		Criterion 4	No. of Criteria Met
		Population Density	Emissions Density		2000 In-Commutes (worker flows) to		2001 Summer Daily Vehicle Miles Traveled (VMT)	
		2007	2007 NOx	2007 VOC	Core counties	Monitored counties	w/o interstates	
	(yes/no)	(persons/sq mile)	(tpy/sq mile)	(tpy/sq mile)	(persons)	(persons)	(miles/day)	
ATLANTA								
Cherokee		440	11	11	41,597	41,766	3,277,346.40	4
Clayton		1,979	84	49	99,057	66,152	4,239,523.26	4
Cobb	Yes	2,150	68	49	301,751	305,446	11,641,231.72	4
Coweta	Yes	266	34	7	14,499	38,078	2,335,876.15	4
DeKalb	Yes	2,726	64	68	325,679	325,606	11,109,850.91	4
Douglas	Yes	549	19	16	25,857	42,689	2,419,880.63	4
Fayette	Yes	574	14	13	23,962	37,328	2,460,373.91	4
Forsyth		668	16	20	25,844	25,967	3,376,456.27	4
Fulton	Yes	1,738	71	52	363,026	358,732	18,437,558.09	4
Gwinnett	Yes	1,785	43	39	288,779	289,889	13,181,926.59	4
Henry	Yes	539	21	14	36,191	43,728	2,817,964.83	4
Paulding	Yes	374	7	8	24,665	37,382	1,851,557.55	3
Rockdale	Yes	616	19	19	14,338	28,629	1,736,565.83	4
Barrow		368	16	18	10,565	10,707	1,561,901.72	2
Bartow		205	30	8	10,062	10,317	2,656,851.02	3
Butts		128	9	7	1,740	2,718	527,038.15	1
Carroll		206	11	11	7,042	12,259	2,625,927.60	3
Dawson	No	104	4	6	2,143	2,148	581,438.14	0
Haralson		102	6	10	1,733	2,651	828,711.34	1
Heard		43	15	4	454	1,488	386,263.09	1
Jasper		38	2	3	717	1,442	470,308.97	0
Lamar		98	5	5	851	1,237	548,854.73	0
Meriwether		45	4	5	859	2,753	782,719.78	0
Newton		298	13	12	8,177	14,696	1,603,222.49	2
Pickens		134	6	8	2,183	2,225	891,478.77	0
Pike		77	3	4	1,067	1,286	491,746.29	0
Spalding		307	15	15	5,071	7,321	1,511,748.59	2
Walton		247	8	10	12,218	13,659	1,934,266.90	3
Hall		444	17	18	11,604	11,590	4,014,380.43	3
Polk		134	7	8	1,406	1,940	1,256,843.37	0
Troup		148	11	15	855	1,740	1,680,467.48	1
Upson		88	5	5	310	340	790,243.48	0
Banks		76	4	4	376	391	492,231.44	0
Chattooga		89	6	4	89	99	826,245.25	0
Clarke	No	908	31	35	2,190	2,383	2,872,706.73	3
Floyd		189	22	11	1,526	1,650	3,036,301.95	2
Gilmer		73	3	3	846	859	976,323.60	0
Gordon		145	11	9	689	709	1,417,958.18	1
Jackson		152	11	7	3,230	3,213	1,545,272.14	1
Lumpkin		92	4	4	1,073	1,083	818,513.61	0
Madison		102	4	4	266	288	896,625.57	0
Morgan		51	6	7	486	679	685,480.82	0
Oconee		176	11	11	740	768	1,362,355.06	1
Putnam		64	59	4	420	479	844,238.14	1
Talbot		17	2	2	69	93	411,567.01	0

ATTACHMENT C

Version date: July 15, 2003

Determination of 8-Hour Ozone Nonattainment Areas in Georgia

County Name	Monitor violates the 8-hour standard?	Criterion 1	Criterion 2		Criterion 3		Criterion 4	No. of Criteria Met
		Population Density	Emissions Density		2000 In-Commutes (worker flows) to		2001 Summer Daily Vehicle Miles Traveled (VMT)	
		2007	2007 NOx	2007 VOC	Core counties	Monitored counties	w/o interstates	
	(yes/no)	(persons/sq mile)	(tpy/sq mile)	(tpy/sq mile)	(persons)	(persons)	(miles/day)	
AUGUSTA								
Burke		29	2	2	2,147	2,147	1,009,887.89	0
Columbia		363	12	14	26,207	22,363	1,641,509.10	2
McDuffie		84	6	6	892	1,332	737,166.53	0
Richmond	Yes	608	25	25	72,696	67,645	4,363,836.99	4
Emanuel		33	2	2	33	33	942,466.58	0
Jefferson		32	2	3	544	544	863,869.69	0
Jenkins		25	2	2	93	93	414,792.46	0
Lincoln		42	3	6	522	522	278,616.08	0
Screven		25	2	2	151	151	651,121.97	0
Warren		23	4	2	232	232	304,374.02	0
Wilkes		23	1	2	69	69	542,270.41	0
MACON								
Bibb	Yes	620	40	36	57,828	54,125	3,372,884.80	4
Crawford		45	2	2	3,002	2,360	394,743.30	0
Jones		66	5	4	6,345	5,988	921,533.85	0
Monroe		63	90	6	3,398	3,262	683,756.19	1
Twiggs		31	4	2	2,179	1,929	439,435.88	0
Houston		336	21	14	48,524	8,570	2,510,757.84	3
Peach		172	13	12	4,308	2,361	699,517.16	1
Baldwin		184	6	9	985	900	1,268,651.45	0
Bleckley		58	3	3	1,028	432	428,672.99	0
Dooly		32	6	4	295	75	468,144.54	0
Laurens		59	4	4	595	501	1,748,505.20	1
Macon		37	7	3	590	270	507,988.87	0
Pulaski		42	2	2	695	161	349,733.29	0
Taylor		25	3	2	298	184	470,280.42	0
Wilkinson		23	3	2	599	538	567,109.69	0
CHATTANOOGA								
Catoosa		384	16	18	14,257	12,320	1,219,090.43	2
Dade		98	9	6	3,838	3,091	446,251.54	1
Walker		143	3	7	20,342	9,098	1,705,784.84	0
Murray	Yes	129	7	5	410	349	1,402,542.48	0
Whitfield		320	23	21	947	807	2,693,984.11	3

Georgia Department of Natural Resources
Environmental Protection Division • Air Protection Branch
4244 International Parkway • Suite 120 • Atlanta • Georgia 30354
404/363-7000 • Fax: 404/363-7100
Lonice C. Barrett, Commissioner
David M. Word, Assistant Director

US EPA
2003 NOV 14 P 2:19
APTMD-19

November 14, 2003

Ms. Beverly Banister
Director, Air Pesticides & Toxics Management Division
U.S. EPA, Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Re: 8-Hour Ozone Nonattainment Designation for Augusta / Richmond County

Dear Ms. Banister:

EPD has recently completed the quality assurance of ozone monitoring data for the 2003 ozone monitoring season for the Augusta area (which extends through October 31, 2003). This quality-assured data has been entered into the Aerometric Information Retrieval System's Air Quality Subsystem (AQS).

A review of the monitoring data for the most recent three year period ending with the 2003 ozone monitoring season indicates that the Augusta area has attained the 8-hour ozone National Ambient Air Quality Standard (NAAQS). As the attached analysis of the monitoring data shows, the current 8-hour ozone design value for the Augusta area is 0.083 parts per million.

As a result of this improvement in monitored ozone concentrations in the Augusta area, EPD is hereby withdrawing our previous recommendation of July 15, 2003, that Richmond County be designated as a nonattainment area for the 8-hour ozone NAAQS and is instead formally requesting that Richmond County be designated as an attainment area.

It is our expectation that the attached data and analysis will be sufficient for you to approve our request regarding the attainment status of Richmond County. If you have any questions or need more information, please contact Ron Methier at (404) 363-7016.

Sincerely,

David M. Word
Assistant Director

c: Ron Methier

Attachments

Review of Augusta Area Ozone Monitoring Data for 2001 – 2003 Ozone Monitoring Seasons

Georgia EPD maintains one ground-level ozone monitoring site in the Augusta area, which has a site identification number of 13-245-00091 and is located at Bungalow Road in Augusta. Pursuant to discussions with Kay Prince and members of her staff, and in support of EPD's request for Richmond County to be designated as attainment for the 8-hour ozone standard, we are submitting the following analysis of the 8-hour and 1-hour ozone design values for the Augusta area.

1. 8-Hour Design Value Analysis

The 8-hour ozone design value for the three year period from 2001 through 2003 is **0.083 parts per million**, which is below the nonattainment designation threshold of 0.085 under the 8-hour ozone NAAQS. The results of running a "Quick Look Report (AMP450)" query in the AQS database system produced the following results for the 8-hour ozone concentrations at this monitoring site:

Analysis of 8-Hour Ozone Concentrations in Augusta Area

Year	**2001**	**2002**	**2003**
Method	047	047	047
% OBS	96	99	100
Valid Days Measured			245
Number Days Required			245
1st Maximum 8-Hour Concentration (ppm)	0.102	0.102	0.082
2nd Maximum 8-Hour Concentration (ppm)	0.086	0.086	0.080
3rd Maximum 8-Hour Concentration (ppm)	0.085	0.085	0.079
4th Maximum 8-Hour Concentration (ppm)	0.082	0.082	0.078
Days Maximum $\geq$ 0.085 (ppm)	3	5	0

2. 1-Hour Design Value Analysis

The 1-hour ozone design value for the three year period from 2001 through 2003 is **0.110 parts per million**, which is substantially below the nonattainment designation threshold of 0.125 under the 1-hour ozone NAAQS.

The results of running a "Quick Look Report (AMP450)" query in the AQS database system produced the following results for the 8-hour ozone concentrations at this monitoring site:

Analysis of 1-Hour Ozone Concentrations in Augusta Area

Year	**2001**	**2002**	**2003**
Method	047	047	047
% OBS	96	99	100
Valid Days Measured	237	243	245
Number Days Required	245	245	245
1st Maximum 8-Hour Concentration (ppm)	0.121	0.112	0.093
2nd Maximum 8-Hour Concentration (ppm)	0.103	0.111	0.091
3rd Maximum 8-Hour Concentration (ppm)	0.101	0.110	0.089
4th Maximum 8-Hour Concentration (ppm)	0.094	0.103	0.089
Days Maximum $\geq$ 0.125 (ppm)	0	0	0
Estimated Days Maximum $\geq$ 0.125 (ppm)	0	0	0
Missing Days < 0.125	0	0	0

3. Average Expected Exceedance Rate for 1-Hour Ozone Concentration

As indicated in the 1-hour ozone Quick Look Report results for the 1-hour ozone standard presented above, the average expected exceedance rate for the 1-hour ozone standard is zero, as expressed as estimated days $\geq$ 0.125 ppm.

For your reference, portions of the AQS Quick Look Reports for the monitored 8-hour and 1-hour ozone concentrations, which contain the calculated values presented in the analyses above, are attached.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

Nov. 5, 2003

Ozone (44201) GEORGIA PPM (007)

8-HOUR

SITE ID	POC	REP ORG	CITY	COUNTY	ADDRESS	YEAR	METH	%OBS	VALID DAYS MEAS	NUM DAYS REQ	1ST MAX 8-HR	2ND MAX 8-HR	3RD MAX 8-HR	4TH MAX 8-HR	DAY MAX>/= 0.085	CERT	EDT
13-021-0012	1	0437	MACON	BIBB	MACON SE	2003	047	100	245	245	.089	.084	.084	.081	1		0
13-245-0091	1	0437	AUGUSTA	RICHMOND	BUNGALOW RD AUGI	2003	047	100	245	245	.082	.080	.079	.078	0		0

Note: The * indicates that the mean does not satisfy summary criteria.

-1003	1	F	COLUMBUS	MUSCOGEE	US HWY 80, SPUR 22 COLUMBUS CRIME LAB , US HWY 80, SPUR 22	1996	4,954	74	0.087	0.085	0.084	0.083	2	0		0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	1997	4,994	96	0.096	0.090	0.084	0.081	2	0		0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	1998	5,007	97	0.104	0.095	0.094	0.089	8	0	Y	0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	1999	5,075	85	0.101	0.098	0.097	0.097	12	0	Y	0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	2000	5,787	98	0.104	0.101	0.095	0.094	7	0		0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	2001	5,791	97	0.081	0.080	0.080	0.079	0	0		0
13-215-1003	1	F	COLUMBUS	MUSCOGEE	COLUMBUS CRIME LAB , US HWY 80, SPUR 22	2002	5,278	89	0.098	0.086	0.082	0.078	2	0		0
13-223-0002	5	F	NOT IN A CITY	PAULDING	DALLAS, DOT	1993	6,152	91	0.117	0.110	0.105	0.102	17	0		0
13-223-0002	5	F	NOT IN A CITY	PAULDING	DALLAS, DOT	1994	6,288	92	0.114	0.101	0.101	0.100	9	0		0
13-223-0002	5	F	NOT IN A CITY	PAULDING	DALLAS, DOT	1995	6,032	87	0.104	0.104	0.100	0.097	15	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	1996	5,793	88	0.104	0.099	0.097	0.092	10	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	1997	5,127	100	0.091	0.090	0.087	0.086	5	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	1998	5,074	99	0.123	0.122	0.112	0.104	26	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	1999	4,518	74	0.107	0.105	0.105	0.103	23	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	2000	5,477	89	0.092	0.091	0.089	0.088	6	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	2001	5,758	98	0.091	0.090	0.086	0.085	4	0		0
13-223-0003	1	F	NOT IN A CITY	PAULDING	YORKVILLE	2002	5,848	99	0.107	0.107	0.104	0.099	11	0		0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1993	6,169	93	0.093	0.092	0.090	0.089	7	0	Y	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1994	6,332	98	0.094	0.088	0.087	0.086	4	0	Y	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1995	6,290	98	0.099	0.099	0.088	0.087	5	0		0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1996	5,822	89	0.093	0.092	0.091	0.089	4	0		0

Note: The * indicates that the mean does not satisfy summary criteria.

EPA United States Environmental Protection Agency

Air Quality Subsystem
QUICK LOOK REPORT

Mar. 26, 2003

Parameter: OZONE (8-Hour)
All Values are in Units of Parts Per Million

Site ID	POC	Org Type	City	County	Address	Year	# Obs	% Obs	Highest Value	2nd Highest Value	3rd Highest Value	4th Highest Value	# > 0.084	Miss Days Assumed< Standard	Certified	Exc. Data
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1997	4,968	95	0.097	0.095	0.092	0.087	5	0		0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1998	5,105	99	0.116	0.108	0.100	0.099	12	0	Y	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1999	4,897	83	0.100	0.092	0.091	0.090	10	0	Y	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2000	5,835	98	0.111	0.107	0.093	0.090	6	0		0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2001	5,735	96	0.102	0.086	0.085	0.082	3	0		0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2002	5,833	99	0.100	0.095	0.092	0.091	5	0		0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1993	6,323	95	0.118	0.113	0.110	0.108	27	0	Y	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1994	6,295	96	0.110	0.107	0.100	0.098	10	0	Y	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

Nov. 5, 2003

Ozone (44201) GEORGIA PPM (007)

1-HOUR

SITE ID	POC	REP ORG	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS MEAS	NUM DAYS REQ	1ST MAX 1-HR	2ND MAX 1-HR	3RD MAX 1-HR	4TH MAX 1-HR	DAY MAX>/= 0.125	EST DAYS>/= .125	MISS DAYS< 0.125	CERT	EDT
13-021-0012	1	0437	MACON	BIBB	MACON SE	2003	047	245	245	.099	.093	.091	.091	0	0.0	0		0
13-245-0091	1	0437	AUGUSTA	RICHMOND	BUNGALOW RD AUGI	2003	047	245	245	.093	.091	.089	.089	0	0.0	0		0

Note: The * indicates that the mean does not satisfy summary criteria.

EPA United States Environmental Protection Agency

Air Quality Subsystem
QUICK LOOK REPORT

Mar. 26, 2003

Parameter: OZONE (1-Hour)
All Values are in Units of Parts Per Million

Site ID	POC	Org Type	City	County	Address	Year	Num Meas	Num Req	Highest Value	2nd Highest Value	3rd Highest Value	4th Highest Value	Values Meas	> 0.124 Est	# Methods Used	Miss Days Assumed< Standard	Exc. Data
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	1999	205	245	0.117	0.108	0.106	0.104	0	0.0	1	0	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2000	242	245	0.129	0.115	0.101	0.100	1	1.0	1	2	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2001	237	245	0.121	0.103	0.101	0.094	0	0.0	1	0	0
13-245-0091	1	F	AUGUSTA	RICHMOND	BUNGALOW RD AUGUSTA GA	2002	243	245	0.112	0.111	0.110	0.103	0	0.0	1	0	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1993	262	275	0.136	0.130	0.129	0.128	5	5.2	1	4	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1994	265	275	0.124	0.122	0.117	0.115	0	0.0	1	1	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1995	273	275	0.166	0.146	0.145	0.141	5	5.0	1	2	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1996	245	275	0.134	0.123	0.121	0.118	1	1.1	1	0	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1997	210	214	0.156	0.139	0.133	0.130	9	9.0	1	4	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1998	214	214	0.140	0.134	0.132	0.129	6	6.0	1	0	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	1999	211	245	0.158	0.155	0.153	0.143	13	15.1	1	0	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	2000	244	245	0.148	0.132	0.125	0.125	4	4.0	1	1	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	2001	245	245	0.132	0.125	0.111	0.108	2	2.0	1	0	0
13-247-0001	1	F	CONYERS	ROCKDALE	CONYERS MONASTERY , 3780 GA HWY 212	2002	240	245	0.147	0.126	0.123	0.116	2	2.0	1	0	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	1993	270	275	0.098	0.093	0.093	0.092	0	0.0	1	2	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	1994	272	275	0.097	0.087	0.083	0.082	0	0.0	1	3	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	1997	207	214	0.103	0.098	0.096	0.091	0	0.0	1	0	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	1998	213	214	0.098	0.095	0.091	0.090	0	0.0	1	1	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	1999	206	245	0.103	0.098	0.096	0.095	0	0.0	1	0	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	2000	245	245	0.109	0.107	0.098	0.096	0	0.0	1	0	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH SCHOOL	2001	242	245	0.093	0.090	0.090	0.087	0	0.0	1	3	0
13-261-1001	2	F	NOT IN A CITY	SUMTER	LESLIE, UNION HIGH	2002	221	245	0.096	0.079	0.077	0.075	0	0.0	1	1	0