UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB - 4 2003

4APT-APB

Harold F. Reheis, Director
Environmental Protection Division
Georgia Department of Natural Resources
Suite 1152, East Tower
205 Butler Street, SE
Atlanta, GA 30334

Dear Mr. Reheis:

Thank you for your submittal of letters of support from Walker and Catoosa Counties for the Chattanooga, Tennessee, Early Action Compact, and for your submittals of an Early Action Compact and Letter of Support for Richmond and Columbia Counties, respectively, which are part of the Augusta-Aiken metropolitan statistical area (MSA). These submittals were received on December 24, 2002. The State of Tennessee submitted an Early Action Compact for Hamilton, Marion, and Meigs Counties which comprise the portion of the Chattanooga MSA in Tennessee. The State of South Carolina submitted Early Action Compacts for Edgefield and Aiken Counties which comprise the portion of the Augusta-Aiken MSA in South Carolina.

The Early Action Compact process was designed to protect human health by enabling an accelerated local approach to ozone attainment, and to encourage early emission reductions that will ensure attainment of the 8-hour ozone standard. The Early Action Compact protocol, which was endorsed by the Environmental Protection Agency (EPA), Region 6, on June 19, 2002, is intended to be used in developing and implementing control strategies, accounting for growth, and achieving and maintaining the 8-hour ozone standard. As such, it represents a key component to these areas' Early Action Compacts. In these Early Action Compacts, you have committed to a planning process that will result in cleaner air for Georgia, potentially prior to the regulatory deadlines that will be established for 8-hour ozone standard nonattainment areas.

The MSA is the EPA's presumptive boundary for the 8-hour ozone standard nonattainment designation, as described in EPA's March 28, 2000, boundary guidance memorandum. As you know, EPA has not yet designated areas as attainment or nonattainment for the 8-hour ozone standard, an action which will take place by April 2004. Prior to EPA's designations for the 8-hour ozone standard, the Agency is soliciting recommendations from the states by April 2003, and will review these submittals based on the March 28, 2000, guidance, submit an official response to the states by October 2003, and have discussions to resolve any remaining issues during the following 120-day period as provided by the Clean Air Act. Through our acceptance of these Compacts, EPA is not prejudging the outcome of the 2004 designations process.

Although the State of Georgia is participating in the Early Action Compacts for the Augusta-Aiken and Chattanooga areas, the Compacts in Georgia do not encompass McDuffie County, which is part of the Augusta-Aiken MSA, or Dade County, which is part of the Chattanooga MSA. EPA may determine later in the designation process that a county which is part of or adjacent to a nonattaining CMSA or MSA, and not a participant in the compact, should be included along with the remainder of the CMSA or MSA as a nonattainment area. If this occurs, then that county, and the entire nonattainment area, will be ineligible for deferral of its nonattainment designation.

We support your efforts to promote early attainment of the 8-hour ozone health standard and believe that this plan will be beneficial to the citizens of Georgia. EPA Region 4 is pleased to be a signatory to these Early Action Compacts. I have enclosed copies of the signed Compacts (these are enclosed in the packages that were mailed to your State Air Quality Agency) and encourage you to share these documents with the local agencies in your State that are part of the process, including your transportation planning partners and other interested stakeholders such as environmental and industrial representatives. You will also receive copies of similar letters that have been provided to South Carolina and Tennessee regarding these areas. EPA Region 4 will continue to work closely with you to assist in this stakeholder planning process, and is developing a web site for the Early Action Compact process to assist you in this effort. This web site will have copies of all of the Compacts which have been approved. The web site address will be provided to your State Air Quality Agency as soon as it is available.

If you have questions or would like to discuss this issue further, please feel free to contact me or have a member of your staff contact Kay Prince of the EPA Region 4 staff at (404) 562-9026.

Sincerely,

J. I. Palmer, Jr.
Regional Administrator

Enclosure

cc: Ronald C. Methier, GA EPD
James A. Joy, III, SC DHEC
Barry R. Stephens, P.E., TN DEC
Robert H. Colby, Chattanooga Air Pollution Control Bureau (w/o encl)