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
Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

December 26, 2007

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

Re: December 31, 2007 Chattanooga Area Early Action Compact Progress Report

Dear Ms. Prince:

The Georgia Environmental Protection Division (EPD) is submitting this letter as a report of Progress of the Chattanooga area Early Action Compact (EAC) approved by EPA in the Federal Register on August 26, 2005 and to certify that the 2005 through 2007 ozone season monitoring data for this EAC area is quality assured and demonstrates attainment with the 8-hour Ozone NAAQS.

The control measures specified for emission reductions, and quantified for the attainment demonstration in the Georgia EAC for the Chattanooga area, include Stage I Vapor Recovery and Open Burning restrictions during the ozone season of May 1 through September 30 of each year for Catoosa and Walker Counties. Both rules were adopted prior to the December 31, 2004 submission of the EAC and were effective January 20, 2005. The open burning rule became enforceable on May 1, 2005 and the Stage I Vapor Recovery Rules became enforceable May 1, 2006. Emission reductions from both rules were part of the attainment demonstration included in the EAC submission. Extensive public awareness, including all stakeholder involvement related to these rules and final SIP revision submittal, was completed prior to the submission of the EAC. The EAC SIP revision submittal included completion of all modeling, technical analysis, and planning/regulatory actions. The State of Georgia, through the EPD, is solely responsible for implementing both measures. The attached table provides more detail concerning this progress update. We have also included more detailed information on Stage I Vapor Recovery, as well as an Assessment of Air Quality for the area as provided to us by the Chattanooga-Hamilton County APCB.

The state has implemented all applicable control measures through December 2007 and will continued to maintain the control measures in place throughout the foreseeable future. In addition, the Chattanooga-Hamilton County APCB has certified in a letter (copy attached) to the Tennessee Department of Environment and Conservation on December 5, 2007, that the 2005 through 2007 ozone season monitoring data has been quality assured. Based on the design values provided to the Division by the Chattanooga-Hamilton County APCB, the area has shown attainment and continues to show attainment with the 1997 8-hour ozone National Ambient Air Quality Standard.

If you have any questions or need more information, please contact Jim Kelly at (404) 363-7131 or via email at James_Kelly@.dnr.state.ga.us.

Sincerely,

James P. Johnston, PE
Program Manager
Planning and Support Program
Air Protection Branch

Enclosures

c: Mr. Bob Colby, Chattanooga-Hamilton County APCB (w/o enclosure)
Mr. Barry R. Stephens, Tennessee Division of Air Pollution Control (w/o enclosure)
Honorable Bebe Heiskell, Walker County Commissioner (w/o enclosure)
Honorable Bill Clark, Catoosa County Commissioner Chairman (w/o enclosure)

Stage I Vapor Recovery

Background

The rules for Gasoline Dispensing Facility – Stage I Vapor Recovery were last amended on January 9, 2005. The amendments included the addition of Catoosa, Walker, and Richmond counties as a part of the area covered by Stage I. Gasoline dispensing facilities that dispense more than 50,000 gallons per month were required to be in compliance with the rule by May 1, 2006. Gasoline dispensing facilities that dispense between 10,000 gallons and 50,001 gallons per month are required to be in compliance with the rule by May 1, 2007.

Compliance

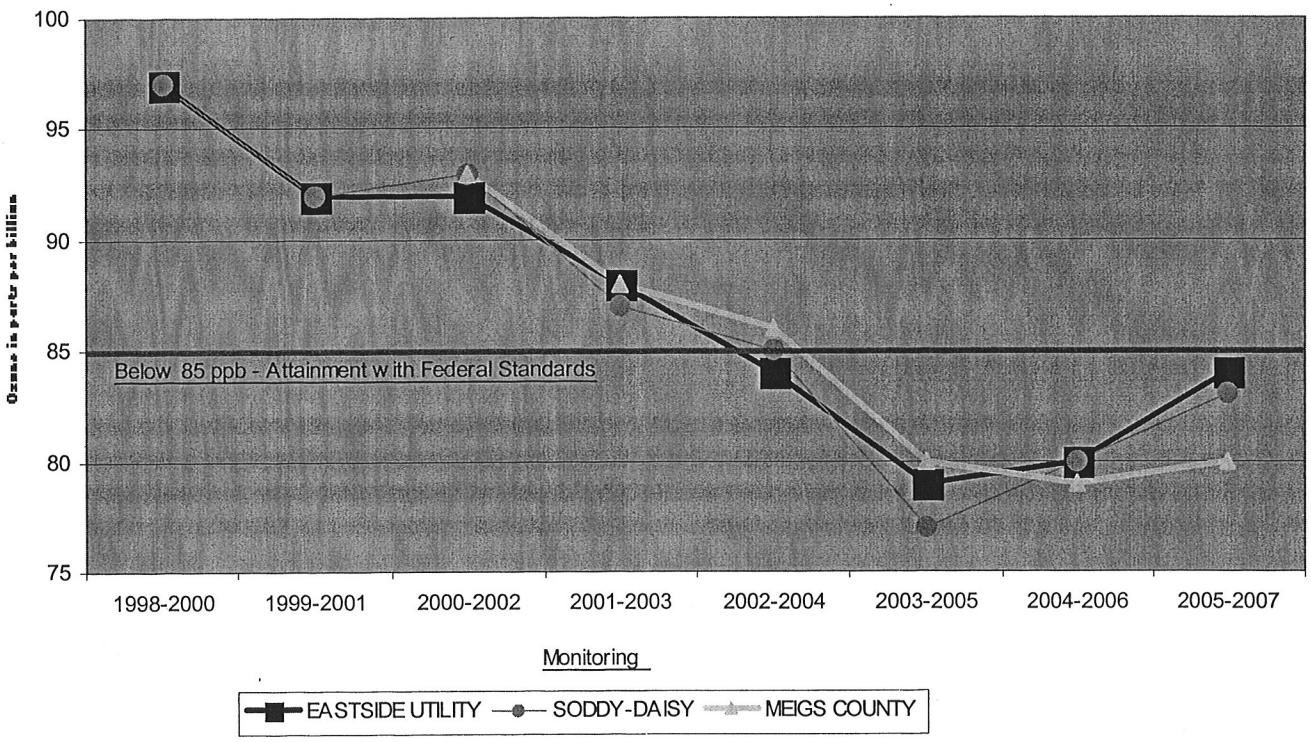
In order for a gasoline dispensing facility to be in compliance, it must have installed a Division approved Stage I vapor recovery system. The system must receive certification by passing the required certification tests. The tests must be conducted once every 5 years. The tests assures that the system is leak tight and meets the requirements in the California Air Resources Board executive orders.

Compliance Assurance

In order to assure that the gasoline dispensing facilities meet the requirements and implementation dates with the Stage I Vapor Recovery rule, the Division has taken or will take the following steps:

Action	Date	Status
Develop regulated facilities database for Catoosa, Walker, and Richmond	1st Quarter 2005	Complete
Send out reminder letters to gasoline transport companies that they must collect gasoline vapors from regulated gasoline dispensing facilities in Catoosa, Walker, and Richmond counties	May 2005	Complete
Send out letter to regulated gasoline dispensing facilities reminding them to have all Stage I controls in place and certified by May 1, 2006 for those facilities dispensing more than 50,000 gallons of gasoline per month	February 2006	Complete
Receive test reports from Stage I systems that have been certified	February – April 2006	Complete
Randomly witness Stage I certification tests	February – April 2006	Complete
Send out notice of violation letters to regulated facilities that have not complied by May 1, 2006	May – December 2006	Complete
Negotiate consent orders if necessary for facilities that remain out of compliance	July 2006 – February 2007	Complete
Repeat activities for gasoline dispensing facilities that dispense between 10,000 gallons and 50,001 gallons per month	January 2007 – February 2008	Ongoing

8-HOUR OZONE DESIGN VALUES FOR CHATTANOOGA AREA - 2000-2007
(3-year average of 4th high values at each monitor)



8-HOUR OZONE DESIGN VALUES FOR CHATTANOOGA AREA - 2000-2007
(3-year average of 4th high values at each monitor)

Note: Attainment with Federal Standards below 85 ppb.

Year	Eastside Utility (ppb)	Soddy-Daisy (ppb)	Meigs County (ppb)
1998-2000	97	97	--
1999-2001	92	92	--
2000-2002	92	93	93
2001-2003	88	87	88
2002-2004	84	85	86
2003-2005	79	77	80
2004-2006	80	80	79
2005-2007	84	83	80

Post-it®	12/14/2007 No. of Pages: 3
To	To: Elisabeth Munsey
Co./Dept.	Fax: 404-363-7100
Phone #	From: Errol Reksten
Fax #	Air Pollution Control Bureau

Chattanooga-Hamilton County Air Pollution Control Bureau

December 5, 2007

Mr. Jackie Waynick
Chief of Technical Services
TN Department of Environment and Conservation
Division of Air Pollution Control
401 Church Street, 9th Floor, L & C Annex
Nashville, Tennessee 37243-1531

Dear Mr. Waynick:

This letter is to notify you that AQS raw ozone data and Precision and Accuracy ozone data for third and fourth calendar quarters of 2007 have been entered into the AQS database and have passed the edit checks. Kathy Jones has run AMP 250, AMP 255, AMP 350, and the Quicklook Criteria AMP 450 to confirm that the data has been entered. This letter is to certify that the ozone data for the year 2007 is true and accurate to the best of our knowledge. All ozone exceedance days in 2007 have been flagged with exceptional event flags and written comments added in the comment fields. AMP 255 and 450 are enclosed with this letter.

EPA Region 4 conducted through-the-probe ozone audits in Hamilton County for the NPEP program on September 18, 2007. It is my understanding that RTI has been contracted to enter that data into AQS for EPA, and it is not the responsibility of the individual agencies. That data submission is not yet indicated on our reports from AQS.

If you have any questions, call me.

Sincerely,

Robert H. Colby

Robert H. Colby
Director

kj

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

December 5, 2007

CERTIFIED MAIL: 7007 0220 0000 1425 2802
RETURN RECEIPT REQUESTED

Mr. David Lutz
U.S. Environmental Protection Agency
109 TW Alexander Drive
MD C304-06
RTP, NC 27711

Dear Mr. Lutz:

This letter is to advise you the State of Tennessee has completed entry of a portion of its ambient ozone data for the 2007 monitoring season into AQS. Ozone data for reporting organizations 1025, 0581, 0682, 0673, and 0170 have been evaluated according to EPA criteria and is complete and accurate to the best of this agency's knowledge. Copies of the AMP 255 Excel Summary Reports and AMP 450 Report are enclosed with this letter and have been forwarded to you electronically. Please proceed with placing the proper certification flag on this data in AQS.

We have flagged a number of days we believe ozone was affected by exceptional events in 2007. Our initial request to confirm the exceptional events was sent to Region 4's Doug Neeley on August 3, 2007. A final package is being prepared at this time for submittal.

If you have any questions regarding this matter or need additional information, please contact Mr. Billy Pugh at (615) 532-0528. Thank you for your assistance.

Sincerely,

Jackie L. Waynick

Jackie L. Waynick, Manager
Technical Services Program

JLW/jct

Enclosure

cc: Darren Palmer, EPA Region 4
Danny France, EPA Region 4
Lynne Liddington, Knoxville APC
Bob Rogers, Memphis APC
Robert H. Colby, Chattanooga APC
Rob Raney, Nashville APC