

January 15, 2015

Honorable Pat Graham, Chair
Barrow County Board of Commissioners
233 East Broad Street
Winder, GA 30680

RE: Status of Attainment for PM 2.5 Air Quality Standards

Dear Chairlady Graham:

On December 1, 2014 I wrote and advised you that it appears both US Environmental Protection Agency (EPA) and Georgia Environmental Protection Division (EPD) are in agreement that most counties in Georgia can be designated "unclassifiable/attainment" for the national 2012 PM 2.5 standard, thus avoiding the "nonattainment" status.

The attached December 18, 2014 letter to Governor Deal from EPA Administrator McCarthy confirms that 137 counties in Georgia, including Barrow County, are now designated as "unclassifiable/attainment" for the 2012 PM 2.5 air quality standards. The EPA decision on the 22 other counties listed in EPA's letter will be deferred pending receipt of more data from EPD.

Congratulations to Barrow County! Joe Tanner & Associates has enjoyed the opportunity to work with you on this issue, and we hope there will be other matters on which we can assist Barrow County in the future.

Best regards,



Harold Reheis

CC: Mr. Guy W. Herring

January 15, 2015

Mr. W. Guy Herring
Economic & Community Development Director
Barrow County Board of Commissioners
233 East Broad Street
Winder, GA 30680

Dear Guy,

With the enclosed correspondence, Joe Tanner & Associates has now completed the scope of work in our professional services agreement with Barrow County for the Barrow County Particulate Matter (PM 2.5) Nonattainment Area Project.

We are happy that EPA has designated Barrow County as "unclassifiable/attainment" for the 2012 PM 2.5 air quality standard, and we appreciate having had the opportunity to serve the County.

Please consider this letter as our final invoice for services rendered for Phase II of the Scope of Services. The lump sum is \$20,000.

Thank you and best regards,



Harold Reheis



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 18 2014

THE ADMINISTRATOR

The Honorable Nathan Deal
Governor of Georgia
203 State Capitol
Atlanta, Georgia 30334

Dear Governor Deal:

I am writing to summarize the U.S. Environmental Protection Agency's recent action to address fine particle pollution in your state. As required by the Clean Air Act, the EPA has determined which areas are meeting the national ambient air quality standards for fine particle pollution and which areas must take steps to reduce emissions that contribute to violations of the standard.

On December 14, 2012, the EPA strengthened the annual, health-based fine particle standard from 15.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 12.0 $\mu\text{g}/\text{m}^3$. Thousands of scientific studies have linked exposure to these tiny particles—approximately 1/30th the size of a human hair—with serious human health problems including premature death in people with heart and lung disease, nonfatal heart attacks, and increased hospital admissions and doctor and emergency room visits for respiratory and cardiovascular disease.

I appreciate the information you and your staff have shared with the EPA throughout this process to assess fine particle pollution levels in communities across your state and the impact of emission sources that could be contributing to unhealthy air. After considering your recommendations, reviewing the most recent certified fine particle air quality data for your state and evaluating factors to assess contribution to nearby levels of fine particle pollution, I have determined that most areas within Georgia do not violate the 2012 standard or contribute to a nearby violation of the standard. As a result, consistent with your comments provided during the 120-day process, the EPA is designating most of the state "unclassifiable/attainment."

As we have been discussing with your staff, the EPA identified data quality issues earlier this year that invalidated fine particle pollution monitoring data for parts of the state of Georgia. As a result, the EPA does not have sufficient air quality monitoring data for 2011-2013 to determine whether these areas in Georgia meet the 2012 annual fine particle standard or contribute to a nearby violation. The EPA expects that for these areas, monitoring data collected after 2013 will provide the requisite amount of valid data for designations and the EPA is deferring final designations for these areas. Once we have determined that sufficient quality assured data are available, we will proceed with a final designation. The enclosed table lists the areas, and counties within them, for which the EPA is deferring its final designation decision.

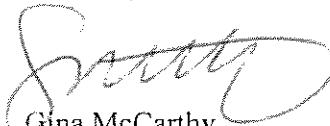
Because air quality monitoring for 2014 is nearly complete, if a state or tribe requests it, the EPA will evaluate the status of an area based on its annual fine particle monitoring data for 2012-2014. If you would like the EPA to re-evaluate any areas within your state, please submit to the EPA, complete, quality-assured and certified air quality data for 2014 by February 27, 2015.

The EPA shares responsibility with the states and tribes for managing particle pollution levels. Efforts by states and tribes to attain the 1997 and 2006 fine particle pollution standards are already working to reduce unhealthy levels of fine particle pollution. In addition, current and upcoming federal standards and safeguards, including pollution reduction rules for power plants, vehicles and fuels will assure steady reductions of fine particle pollution and will protect public health in communities across the country.

Together, we have made considerable progress to reduce fine particle pollution. Nationwide, monitored levels of fine particle pollution have fallen 34 percent since 2000 when we first began nationwide monitoring for particles of this size. I am confident this progress will continue as we work together towards our shared goal of clean air. For additional information about these designations, please visit our website at: www.epa.gov/pmdesignations.

If you have questions or concerns, please contact me or your staff may contact Mark Rupp, Deputy Associate Administrator for Intergovernmental Relations, at rupp.mark@epa.gov or at (202) 564-7178.

Sincerely,



Gina McCarthy

Enclosure

Enclosure – Deferred Area Designations for the 2012 Annual Fine Particle Standard, Georgia

State	Area Name	2014 EPA Deferred Counties
GA	Washington County, GA	Washington, GA
	Savannah, GA	Chatham, GA
		Effingham, GA
	Augusta, GA-SC	Columbia, GA
		Richmond, GA
	Valdosta, GA	Brooks, GA
		Lowndes, GA
	Columbus, GA-AL	Muscogee, GA
	Atlanta, GA	Bartow, GA
		Clayton, GA
		Cobb, GA
		Coweta, GA
		DeKalb, GA
		Fulton, GA
		Gwinnett, GA
		Cherokee, GA
		Henry, GA
Forsyth, GA		
Paulding, GA		
Douglas, GA		
Brunswick, GA	Glynn, GA	
Albany, GA	Dougherty, GA	

December 1, 2014

Honorable Pat Graham, Chair
Barrow County Board of Commissioners
233 East Broad Street
Winder, GA 30680

RE: Status of Attainment for PM 2.5 Air Quality Standards

Dear Chairlady Graham:

This letter is to inform you of the current status of the efforts by the State of Georgia and the U.S. Environmental Protection Agency (USEPA) to determine the extent to which counties in Georgia may be removed from the State and Federal lists of areas not attaining the national air quality standards for fine particles (also called the 2012 PM 2.5 standard). In summary, as explained below, Barrow County should be declared as attaining the 2012 PM 2.5 standard by the end of 2014, but there may be a period of uncertainty over the attainment of the "old" 1997 PM 2.5 standard.

On your behalf, Joe Tanner & Associates drafted a comment letter to the Georgia Environmental Protection Division (EPD), which you sent to EPD on November 18, 2013. With the information in that letter and EPD's own analysis, EPD Director Jud Turner submitted a report to USEPA on December 13, 2013, which included a recommendation that Barrow County be designated as attaining the 2012 PM 2.5 standard.

USEPA's southeastern region office in Atlanta reviewed Georgia's report and arrived at a preliminary response to Georgia's PM 2.5 recommendations. This response was sent to Governor Deal from EPA's Southeastern Region Administrator, Ms. Heather McTeer Toney on August 19, 2014. The letter says that EPA intends to designate twelve Atlanta region counties as "unclassifiable" due to a lack of sufficient monitoring data. These twelve counties are: Bartow, Clayton, Cherokee, Cobb, Coweta, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Henry and Paulding. Two other counties outside the Atlanta region, Dougherty and Glynn, would also be designated "unclassifiable."

Administrator Toney's letter further says that USEPA intends to defer designations for five other areas of Georgia (Augusta, Columbus, Savannah, Valdosta, and Washington County) and to designate all other Georgia counties as "unclassifiable/attainment" for the 2012 PM 2.5 standard. These intended decisions are subject to public comment and to final review in Washington, DC by the headquarters office of USEPA.

The initial plan of USEPA was to make a final decision by the end of 2014. However, EPD Director Jud Turner wrote to Administrator Toney on October 27, 2014, and requested that USEPA defer its final designations until the end of 2015 for the following 14 counties: Atlanta Area (Bartow, Cherokee,

Clayton, Cobb, Coweta, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Henry, and Paulding); Brunswick Area (Glynn); and Albany Area (Dougherty). EPD believes that this deferral will allow EPD to provide to USEPA additional data to demonstrate that all of these counties can be designated "unclassifiable/attainment" for the 2012 PM 2.5 air quality standard.

Whether or not Administrator Toney grants Director Turner's request for deferral on those 14 counties, it appears that USEPA and EPD are in agreement that by the end of 2014, the other counties in Georgia can be designated as "unclassifiable/attainment". This would result in Barrow County not having a "nonattainment" label for the 2012 PM 2.5 standard. Additional comments and analyses are not likely to change Administrator Toney's preliminary finding to one which would result in a "nonattainment" label.

However, there is one potential fly in the ointment. In 2005, 27 counties in Georgia, including Barrow County, were designated nonattainment for the 1997 PM 2.5 air quality standards. The air quality control programs implemented by EPD since that time have greatly reduced PM 2.5 levels in the Atlanta region and across Georgia, and the 1997 PM 2.5 standard is less stringent than the 2012 standard.


Three of those 27 counties (Bibb, Floyd, and Monroe) have been re-designated to attainment by USEPA, and two more (Catoosa and Walker) are proposed for re-designation to attainment. Nonetheless, insufficient information and documentation has prevented EPD from proving to USEPA that the remaining 22 counties are meeting the 1997 PM 2.5 standard. It will be sometime in 2015 before that case is made to USEPA's satisfaction. If that is so, 22 counties in Georgia, including Barrow County, may remain "nonattainment" for the 1997 PM 2.5 standard, even though they are attaining the 2012 PM 2.5 standard.

If this is the situation, it may be that new industries proposing to locate in any of these counties in the next several months, including Barrow, will have to provide "offsets" for their proposed emissions if those emissions are large enough to be major sources of PM 2.5. That is the situation that has existed since 2005, and it may continue for a while. EPD and USEPA are working together to get this resolved quickly, and there is reason to believe that all Georgia counties will be designated "attainment" for the 1997 PM 2.5 standard by mid-2015.

This is Joe Tanner & Associates' assessment of the situation. This may change if EPD or USEPA make different findings between now and the end of 2014.

We will keep you informed of any new developments on this matter. Please call me at 404-659-4663 if you have any questions.

Sincerely,



Harold F. Reheis
Executive Vice President

cc: Mr. Guy W. Herring