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Georgia Department of Natural Resources
Environmental Protection Division • Air Protection Branch
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Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

December 22, 2006

AIR PLANNING BRANCH
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EPA REGION 4
ATLANTA, GA.

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 30, 2006 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.

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.

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/enclosure)
Mr. Barry R. Stephens, Tennessee Division of Air Pollution Control (w/enclosure)
Honorable Bebe Heiskell, Walker County Commissioner (w/enclosure)
Honorable Bill Clark, Catoosa County Commissioner Chairman (w/enclosure)

Report on Implementation Milestones: Chattanooga (Walker & Catoosa Counties) EAC

Control Measure	Summary Description of Control Measure	Program/Measure Status	Implementation Date	VOC/NOx Reduction	Resources	Additional Information
Public Outreach Program	EPD conducted extensive public outreach prior to the adoption of both the Stage I Vapor Recovery Rule and the Open Burning Rule detailed in the EAC SIP revision submittal.	Public knowledge of a rule influences the effectiveness of the rules. Public Outreach Meetings were held for both the Open Burning Rule and the Stage I Vapor Recovery Requirements. See Rules listed below for further information.	Completed upon submission of EAC.	See Rules listed below.	Not Applicable.	None.
Open Burning Rule	An open burning ban will be implemented at the state level. The open burning ban will be in effect for the duration of the ozone season, which is May 1 through September 30. Some types of open burning have always been prohibited by the Georgia Rules for Air Quality Control. This will prohibit several additional types of burning during the ozone season such as the following:· Burning of leaves, tree limbs, or other yard wastes or storm debris; burning of vegetative waste from land clearing (includes a ban on the use of air curtain destructors); and burning for the purpose of weed abatement, disease, and pest prevention.	For the Open Burning Rule; letters were sent to stakeholders, reporters from the local newspapers were contacted, information was distributed via e-mail through the Chamber of Commerce's distribution list, letters were faxed to elected officials, information was posted on the Air Protection's Open Burning Ban website, and District Offices, Extension Services, Code Enforcements, and the Forestry Service were contacted.	1-May-05	0.18 tons per day of NOx and 0.64 tons per day of VOC.	Not Applicable.	None.
Stage I Vapor Recovery	Stage I vapor recovery will be implemented at the state level. Stage I vapor recovery is used during the refueling of gasoline storage tanks to reduce emissions of VOCs. Vapors in storage tanks that are displaced by incoming gasoline would be routed into the gasoline tank truck and therefore captured, instead of being vented to the atmosphere.	For the Stage I Vapor Recovery rule; EPD worked with Petroleum Council of GA, Georgia Oilmen's Association, Georgia Association of Convenience Stores, Atlanta Retailers Association, Georgia Association of Petroleum Retailers, Korean American Grocers Association of Georgia who emailed or faxed the information to their members, information was posted on the Air Protection's Stage I Vapor Recovery website, and EPD notified elected officials. Additionally, fliers were emailed to the Chambers of Commerce who in turn emailed the flier to their members, EPD sent fliers to stakeholders (UST, Carriers, and Transporters mailing lists), letters were sent to elected officials, the District Offices were notified of the meeting, and meeting information was sent to local newspapers.	1-May-06	0.81 tons per day of VOC by 2007 and 0.93 tons per day of VOC by 2012.	Not Applicable.	None.

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.

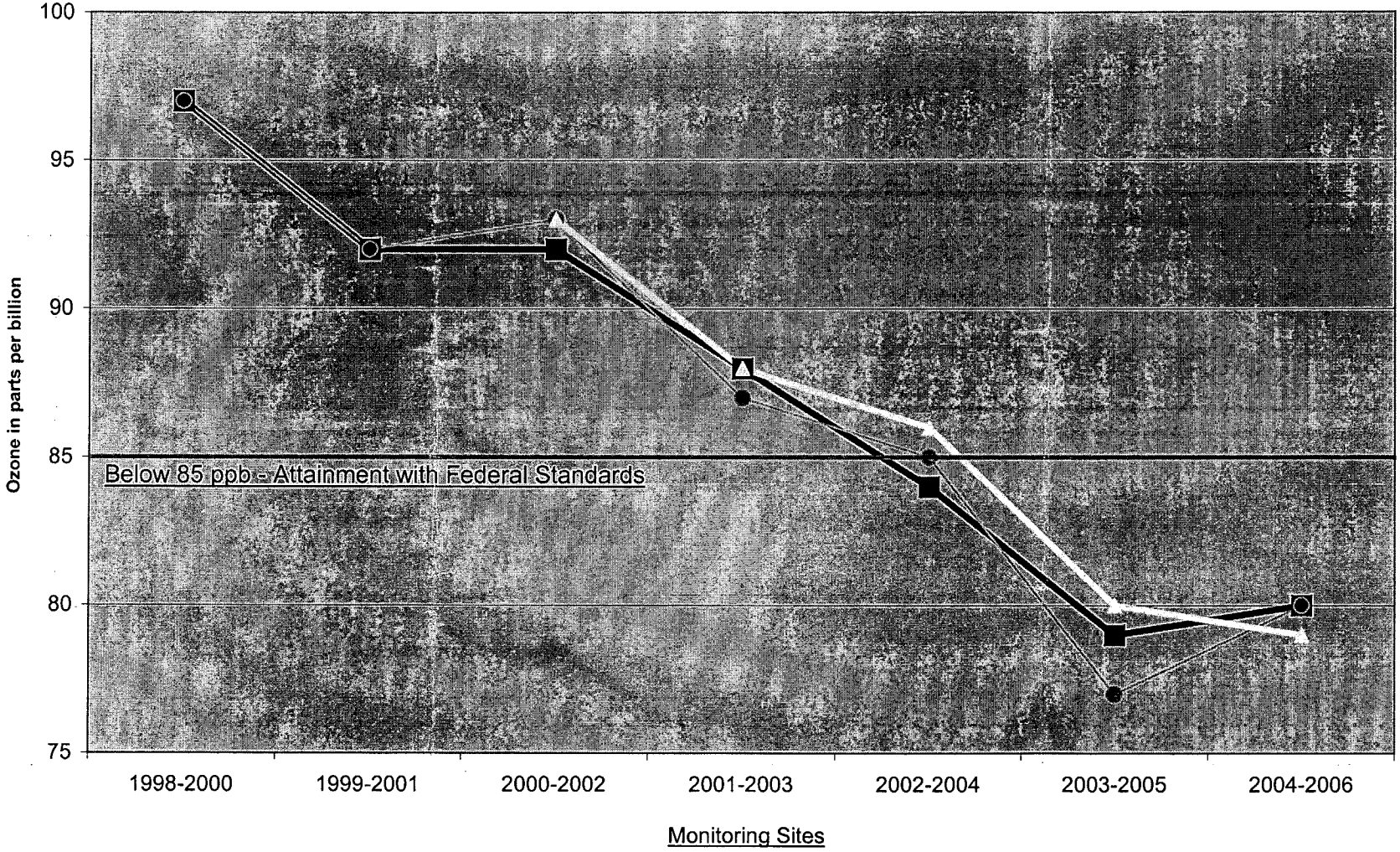
Compliance

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	On-going: some tests originally failed. Staff are witnessing retests
Send out notice of violation letters to regulated facilities that have not complied by May 1, 2006	May – December 2006	Following up on facilities that received NOVs for not testing
Negotiate consent orders if necessary for facilities that remain out of compliance	July – February 2007	Ongoing
Repeat activities for gasoline dispensing facilities that dispense between 10,000 gallons and 50,001 gallons per month	January – September 2007	Ongoing

8-HOUR OZONE DESIGN VALUES FOR CHATTANOOGA AREA - 2000-2006

(3-year average of 4th high values at each monitor)