



OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Memorandum Report

Review of Changes to the Atlantic Steel Transportation Control Measure

Report No. 2005-S-00005

February 16, 2005



Report Contributors:

John Bishop
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Abbreviations

EPA	Environmental Protection Agency
OIG	Office of Inspector General
SIP	State Implementation Plan
TCM	Transportation Control Measure

Cover photo: Signs of the U.S. Department of Transportation. Source:
<http://www.dot.ca.gov/hq/TransEnhAct/pics/construction/signs.jpg>



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

Our review was prompted by a hotline complaint regarding the Atlantic Steel transportation control measure (TCM) in Atlanta, Georgia. In response to the complainant's concerns, we sought to determine whether (1) changes to selected zoning conditions in the Atlantic Steel TCM necessitated a State implementation plan (SIP) revision; and (2) Environmental Protection Agency (EPA) Region 4 oversight of the Atlantic Steel TCM was adequate.

Background

The Atlantic Steel project is a brownfields redevelopment effort that was designated as a TCM in the Georgia SIP, and is also a Project XL effort that allows the use of innovative strategies to achieve environmental goals. The complainant contended that the City of Atlanta changed provisions of the TCM's zoning condition #4 without submitting a SIP revision for EPA approval. Zoning condition #4 is related to limiting cut-through traffic in existing residential neighborhoods around the Atlantic Steel development.

For further information, contact our Office of Congressional and Public Liaison at (202) 566-2391.

To view the full report, click on the following link:

www.epa.gov/oig/reports/2005/20050216-2005-S-00005.pdf

Review of Changes to the Atlantic Steel Transportation Control Measure

What We Found

We did not find evidence that the change to zoning condition #4 would have a negative effect on the ability of Georgia to attain the National Ambient Air Quality Standards of the current SIP. The revised zoning condition replaces vague language related to traffic calming (e.g., speed humps) with specific prescribed actions and timetables, and the change does not result in the SIP being "substantially inadequate" to attain the Standards. The zoning changes include specific measures to limit cut-through traffic and do not, at this time, appear to result in increased air emissions or an undermining of the TCM. Accordingly, we concluded that a revision to the Georgia SIP was not required in this instance.

We found that Region 4's oversight of the changes to zoning condition #4 was generally adequate for the period reviewed. The public was provided the opportunity to comment on the proposed changes to zoning condition #4, and Region 4 officials mediated a compromise agreement to the zoning condition language. However, Region 4 officials acknowledged that the annual public meetings required under Project XL had not occurred in over a year. Region 4 officials committed to starting the annual meeting process again in February 2005, and to monitor the City of Atlanta's progress in ensuring that the terms in zoning condition #4 are met. Also, EPA participates in public meetings held by the Atlanta Regional Commission's Air Quality Interagency Consultation group and the State's "Green Light Team" meetings regarding the Atlantic Steel project, but we noted that dates and times are not advertised to sufficiently inform the public as to when the meetings are held, and that EPA could take further measures to increase the opportunity for public involvement in the project.

What We Recommend

We recommend that EPA Region 4 use the annual public meetings required by Project XL to monitor any future negative impacts to certain streets as a result of the zoning condition #4 change, post the dates and times of meetings held by the Atlanta Regional Commission's Air Quality Interagency Consultation group and State's "Green Light Team" on EPA's public web site to increase opportunities for public involvement, and develop a forum on its public web site for the public to post questions and concerns about the Atlantic Steel project and for EPA to post responses to these concerns. In its response to the draft memorandum report, EPA Region 4 agreed with our conclusions and recommendations.



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

OFFICE OF
INSPECTOR GENERAL

February 16, 2005

MEMORANDUM

SUBJECT: Review of Changes to the Atlantic Steel Transportation Control Measure
Report No. 2005-S-00005

FROM: J. Rick Beusse /s/
Director for Program Evaluation, Air Issues

TO: James I. Palmer
EPA Region 4, Regional Administrator

In July 2004, changes were made to selected aspects of the Atlantic Steel transportation control measure (TCM) governing the redevelopment of a brownfields site in Atlanta, Georgia. Subsequent to these changes, a resident of an adjoining community expressed concern over the implementation of selected aspects of the TCM, prompting our review.

Background

The Atlantic Steel Redevelopment project involves constructing a mixed use development - to include residences, offices, and other commercial properties - at the site of a former steel mill that spans 138 acres in the northwest corner of Atlanta's urbanized core. The project includes a bridge to cross and provide access to an adjacent highway as well as connect the site to a nearby mass transit rail station. The project will increase vehicular traffic at the site as well as in surrounding communities. The Atlantic Steel Redevelopment project is being developed under the Environmental Protection Agency's (EPA) "Project XL" program, which allows the use of innovative strategies to test better or more cost-effective ways of achieving environmental and public health protection.

Because the City of Atlanta was out of compliance with Federal transportation conformity requirements when the Project XL agreement was signed in 1999, no Federal funds or approvals for certain types of transportation projects could be granted to the City. However, under the Clean Air Act, a transportation project that demonstrates an expected air quality benefit may be designated as a TCM. This TCM designation allowed the municipality or the Georgia Department of Transportation greater flexibility in acquiring Federal funds and gaining Federal approval for projects that would not otherwise have been eligible.

The scope of the Atlantic Steel TCM was complex and involved land use, site design, and other transportation conditions. The TCM was non-traditional in the sense that it included aspects that could be considered TCMs individually, as well as others that would not have qualified as TCMs by themselves but contributed to the air quality benefits of the project. EPA considered Atlantic Steel as a single TCM because of the cumulative effect that the various aspects of the project would have on emissions reductions and the use of alternative modes of transportation. EPA approved a State implementation plan (SIP) revision, incorporating the Atlantic Steel TCM, for the Georgia SIP in August 2000.

The City adopted 27 special zoning conditions for the Atlantic Steel site that go beyond zoning conditions typically adopted by the City. EPA identified 18 of the 27 zoning conditions that they believed supported the Atlantic Steel project being classified as a TCM. These 18 conditions are identified in the April 10, 2000, proposed rule to approve Georgia's revised SIP to include the Atlantic Steel TCM. In July 2004, the City of Atlanta approved changes to 1 of the 18 conditions – zoning condition #4, which is related to limiting cut-through traffic in existing residential neighborhoods around the Atlantic Steel development through the use of traffic calming devices (e.g., speed humps). Additional information on the original and changed zoning condition #4 are in Appendix 1.

Summary of Complainant Concerns

In May 2004 the Office of Inspector General received a hotline complaint regarding the proposed changes to zoning condition #4. The complainant, who resides in the Home Park community adjacent to the Atlantic Steel site, contended that the zoning conditions identified in the TCM were part of the August 2000 approved Georgia SIP and any subsequent changes to these conditions required a SIP revision. He also expressed concern about the zoning condition being modified without appropriate consideration of the community's position. According to the complainant, the implementation of zoning condition #4, or lack thereof, has been an ongoing concern for some members of the Home Park community.¹

In June 2004, EPA Region 4 held a mediation session between representatives of the Atlantic Steel developer, the City of Atlanta, and neighborhood representatives to discuss revisions to zoning condition #4 and specific traffic calming measures desired by some neighborhood residents. The participants discussed, among other measures, the threshold for the volume of cars per day that would trigger the developer to install a traffic triangle, and narrowing the width of State Street (a street in the Home Park neighborhood). Language incorporating these measures into zoning condition #4 was agreed to in the mediation session by all parties and was subsequently approved by the Atlanta City Council and the Mayor in July 2004.

¹Members of the Home Park community filed suit against the City of Atlanta for not properly implementing zoning conditions #4 and #23 of the Atlantic Steel TCM. The Superior Court of Fulton County, State of Georgia, granted Summary Judgment to the Plaintiffs on May 20, 2003, ordering the City to implement zoning condition #4 in a manner consistent with its intent.

Despite the agreement reached in mediation, the complainant continued to express concern over whether EPA followed proper procedure by not requiring a SIP revision to make changes to zoning condition #4. The complainant also expressed concern over Region 4's oversight effort with regard to the implementation of zoning condition #4 and future community issues arising from the Atlantic Steel Project XL development. In response to the complainant's concerns, we agreed to determine whether:

- Changes to selected zoning conditions in the Atlantic Steel TCM necessitated a SIP revision.
- Region 4's oversight to date of the Atlantic Steel TCM implementation was adequate, particularly with regard to zoning condition #4.

The scope and methodology for our review are discussed in Appendix 2.

Results of Office of Inspector General Review

Changes to zoning condition #4 did not necessitate a SIP revision

The Clean Air Act requires a revision to a SIP when there has been a change in the National Ambient Air Quality Standards, any improved methods of attainment, or any finding by EPA that the plan is "substantially inadequate" to attain the Standards.² If the Administrator finds that a State's SIP is "substantially inadequate" to attain or maintain the standards or to adequately mitigate interstate pollutant transport, then the Administrator is authorized to "require the state to revise the plan as necessary to correct such inadequacies" within 18 months.³ This procedure is called a "SIP call." Whether a SIP revision was necessary when Atlanta modified the zoning measures depends on whether the changes resulted in the SIP being "substantially inadequate." The SIP must also be revised if a specific TCM in an approved SIP is changed or substituted. However, according to a key official from EPA's Office of Transportation and Air Quality, EPA is allowed discretion in determining what constitutes a significant change to a TCM.

We did not find evidence that the change to zoning condition #4 would have a negative effect on the ability of Georgia to attain the National Ambient Air Quality Standards of the current SIP. The revised zoning condition replaces vague traffic calming language with specific prescribed actions and timetables. The emissions reduction benefits of zoning condition #4 on its own appear to be minor, both in its original form and as currently written. The zoning changes include specific measures to limit cut-through traffic and do not, at this time, appear to result in increased emissions or an undermining of the TCM. Region 4 asserts the revision does not result in any change in emissions and will in all likelihood enhance the ability to reduce emissions. Accordingly, because there is no basis to conclude that the "substantial inadequacy" test has been met, we concluded that a revision to the Georgia SIP was not required in this instance.

²42 U.S.C § 7410(a)(2)(H)

³42 U.S.C.§7410(k)(5)

EPA Region 4 officials noted that the language in the revised zoning condition #4 is actually more strict than the previous version of the condition. According to Region 4 officials, the original zoning condition contained vague language that required the developer to work with the City and the Home Park neighborhood to limit cut-through traffic by means of traffic calming devices. The revised language contains detailed measures and timeframes to reduce cut-through traffic to State Street (see Appendix 1 for full text of the original and revised zoning language). Key provisions in the revised language call for the developer to:

- Install a median and signs prohibiting left turns onto State Street.
- Install sidewalks and narrow State Street to a width of 32 feet.
- Install four speed humps if requested by residents and approved by the City of Atlanta.
- Commission a traffic survey within 2 months of opening State Street and annually thereafter.
- Install a traffic triangle if the survey shows traffic exceeds a threshold volume of 3,700 average annual daily traffic, or a peak period threshold of 1,000 vehicles per hour.

While the change to zoning condition #4 was more prescriptive than the original language, it shifted the focus from the entire Home Park neighborhood to one street - State Street.⁴ Region 4 said that State Street is the largest street in the area and that it is the most logical place for traffic to cut through. A key Region 4 official told us that State Street was therefore in need of more traffic calming. Region officials contended that the new zoning condition #4 language would have very little, if any, impact on the streets surrounding State Street, largely because cut-through traffic on these was limited by a solid median on 16th Street. Nonetheless, the project's *Finding of No Significant Impact* provides a mechanism for addressing traffic problems in the event that future problems arise. The *Finding of No Significant Impact* states that if cut-through traffic attributed to Atlantic Steel is determined to be excessive in Home Park or surrounding areas, appropriate Atlantic Steel Brownfield Area and Tax Allocation District Number Two funds would be utilized to study and implement measures to limit cut-through traffic.

The EPA Office of Transportation and Air Quality official told us that TCMs are not generally associated with large emissions reductions, but they can be very useful in helping to mitigate localized air quality problems (e.g., carbon monoxide hotspots). EPA performed a carbon monoxide hotspot analysis to determine the air quality impacts on surrounding neighborhoods generated by the Atlantic Steel redevelopment project. EPA concluded that the project and associated roadway improvements would be extremely unlikely to create a localized violation of the National Ambient Air Quality Standards for carbon monoxide in the foreseeable future. Additionally, Region 4 officials told us that there are no emissions reduction credits associated with the Atlantic Steel TCM. Region 4 officials said that zoning condition #4 was not relied upon by EPA in its emissions analysis to determine whether the TCM would reduce air pollution factors such as vehicle miles traveled and nitrogen oxide emissions. Instead, zoning condition #4 was a measure designed to minimize traffic impacts to the surrounding neighborhoods.

⁴The revised zoning condition still retains general language from the original related to addressing traffic in the Loring Heights community.

EPA Region 4 oversight of changes to zoning condition #4 generally adequate, but promised improvements would better ensure concerns resolved expeditiously

EPA Region 4 has oversight authority under Project XL and shares oversight authority on the Atlantic Steel TCM with the State of Georgia. Annual monitoring is a regulatory requirement of the SIP and is required to ensure that the project is meeting the performance targets included in the TCM. Also, the Project XL final project agreement includes a requirement that the developer submit to EPA an annual report providing a summary of environmental performance data and describing progress toward completing the project. The final project agreement also includes provisions for an annual public meeting to be held in February of each year.

Region 4 officials told us that EPA monitors actions associated with the TCM in the following forums:

- EPA participates in monthly meetings of the Atlanta Regional Commission's Air Quality Interagency Consultation group to discuss air quality conformity issues, including status of TCMs, for the Atlanta metropolitan area. The City of Atlanta, Georgia Department of Transportation, and the Atlantic Steel developer also participate in these meetings and are required to file annual monitoring reports to the Interagency Consultation group.
- EPA participates in bimonthly meetings of the "Green Light Team," a special committee established by the Governor of Georgia to coordinate activities and monitor development of the Atlantic Steel project, including related transportation components. The City of Atlanta and the developer regularly participate in these meetings.

The Interagency Consultation group and Green Light Team meetings are open to the public. However, according to a Region 4 official, the meeting dates and times are not advertised, so the public rarely attends.

In addition to the above, Region 4 officials conducted specific oversight activities related to zoning condition #4. Officials told us that EPA plays an active, informal role in monitoring changes to ensure that they do not violate the spirit of the TCM or impact future performance measures. Region 4 officials said they maintained communications with the key stakeholder parties throughout the process of changing zoning condition #4. They told us they worked informally with the City to incorporate traffic calming provisions into the revised zoning condition, such as eliminating left-hand turns from 16th Street onto State Street. Region 4 sent letters to both the City of Atlanta and the complainant outlining what they perceived to be the proper procedure for modifying Atlantic Steel zoning conditions. As discussed above, in June 2004, Region 4 held a mediation session with the developer and representatives from the affected neighborhood community groups resulting in a compromise agreement on the language of the zoning condition.

Overall, we concluded that Region 4's oversight of the changes to zoning condition #4 was generally adequate for the period reviewed. The public was provided the opportunity to

comment on the proposed changes to zoning condition #4, and Region 4 officials mediated a compromise agreement to the zoning condition language. However, Region 4 officials acknowledged that the annual public meetings required under Project XL had not occurred in over a year. An official told us that this was due to the fact that the Innovations Coordinator position had been vacant. Region 4 officials committed to starting the annual meeting process again in February 2005, and indicated they would provide enough pre-meeting notice so the community members could contribute to the overall agenda of the meeting.

The complainant had expressed a desire for more frequent public meetings, suggesting that they occur twice a year. However, if EPA Region 4 ensures that the monthly Interagency Consultation group and the bimonthly Green Light Team meeting dates are advertised, this should provide the public with a greater opportunity to attend and voice any concerns. Region 4 officials also pointed out that a public comment web page would be a forum for EPA to review and respond to the public's concerns.

Region 4 officials told us that although there are lines of communication between Region 4 and the City of Atlanta, they sometimes found it difficult to get updates on all changes affecting the Atlantic Steel TCM. Region 4 officials said they would monitor the City of Atlanta's progress in ensuring the completion of the terms in zoning condition #4. As of January 11, 2005 the developer had not yet submitted a permit application, to the City of Atlanta, for the construction of provisions outlined in zoning condition #4.⁵ However, State Street had been closed to traffic and the developer had been working with the community to create a proposed permit application that would be agreeable to local residents.

Conclusions

While the TCM zoning conditions are a part of the SIP, the change to zoning condition #4 did not necessitate a SIP revision. We found that Region 4's oversight of the zoning condition change was generally adequate. However, the lack of an annual public meeting in over a year, a key responsibility of the Project XL final project agreement, may have deprived the public of a forum for expressing their concerns over the Atlantic Steel project. The Region has committed to taking specific additional steps related to zoning condition #4. Advertising the dates and times of the monthly and bi-monthly Interagency Consultation group and Green Light Team meetings, respectively, which are open to the public, and developing a web site forum for posting questions and concerns and EPA's responses should increase opportunity for public involvement on the project. Region 4 should maintain regular contact with the City of Atlanta and the residential communities surrounding the Atlantic Steel redevelopment project to monitor future traffic and air quality impacts.

⁵In their response to our draft memorandum report, EPA Region 4 officials noted that the developer submitted the permit application to the City of Atlanta on January 24, 2005.

Recommendations

We recommend that the EPA Region 4 Regional Administrator:

1. Use the annual public meetings required by Project XL to monitor any future negative impacts to State Street and surrounding streets as a result of the zoning condition #4 change.
2. Post the dates, times, and agendas (if available) of the Green Light Team and Atlanta Regional Commission's Air Quality Interagency Consultation group meetings on its public web site, or other appropriate web sites, to increase opportunities for public involvement.
3. Develop a forum on or linked to, as appropriate, its public web site for the public to post questions and concerns about the Atlantic Steel project and for EPA to post responses to these concerns.

Region 4 Response

EPA Region 4 provided comments to our draft memorandum report, and, where appropriate, we made revisions. The Region agreed with all major conclusions and recommendations in the memorandum report. See Appendix 3 for the full text of the Region's response.

Action Required

In accordance with EPA Manual 2750, as the action official, you are required to provide this office with a written response within 90 days of the final report date. The response should address all recommendations. For the corrective actions planned but not completed by the response date, please describe the actions that are ongoing and provide a timetable for completion. We appreciate the efforts of EPA officials and staff, as well as external stakeholders, in working with us to develop this memorandum report. For your convenience, this report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact me at (919) 541-5747 or John Bishop, Assignment Manager, at (919) 541-1028.

Additional Information on Zoning Condition #4

Original zoning condition #4 as passed by the City of the Atlanta (April 1998):

The developer will work with the City and Home Park to limit cut-through traffic on residential streets perpendicular to and south of 16th Street by means of cul-de-sacs, speed humps, gates, control arms, and other traffic calming devices. The developer will work with the City and Loring Heights neighborhood to limit cut-through traffic on Bishop Street.

Original zoning condition #4 as described in the April 2000 Federal Register notice proposing approval of the TCM inclusion in the Georgia SIP:

The developer will work with the City and neighborhood groups to limit cut-through traffic in designated areas by use of cul-de-sacs and traffic calming devices. This condition will promote pedestrian activity.

Revised zoning condition #4 as approved by the Atlanta City Council (July 2004)

The developer will install medians on 16th Street at its intersections with Francis, Holly, Barnes and Atlantic Streets. The developer will replace the existing westbound left turn lane at the 16th Street/State Street intersection with a median and install signs prohibiting southbound left turns from 16th Street onto State Street, and will remove the existing traffic island at 16th and State Streets in order to reduce southbound right turns from eastbound 16th Street onto State Street. The configurations and width dimensions of the medians at the 16th Street/State Street intersection, the location of signage and the elimination of the traffic island at the southwest corner of the intersection are indicated on Exhibit 1, attached hereto and by this reference made a part hereof. On State Street, the developer will install sidewalks within the existing City right-of-way on each side of the street between 16th and 14th Streets, including a grass buffer at the curb, not to exceed 3 feet wide including the curb, and a sidewalk five feet in width on the east side of the street, and six feet on the west side of the street. The developer will narrow State Street between 16th and 14th Streets to a width of 32 feet, curb to curb. If requested by the residents of State Street and approved by the City, the developer will pay for the installation of four speed humps on State Street between 16th and 14th Streets. In determining whether the requisite percentage of homeowners of State Street between 16th and 14th Streets desires the installation of speed humps, if Atlantic Station is the owner of properties on State Street at the time of petition, Atlantic Station will sign on behalf of such properties with the majority of other homeowners. Within two months after the opening of the streets and annually thereafter, the developer shall hire a recognized traffic engineering firm to conduct a traffic survey of State Street, monitoring a 24-hour normal weekday period, taken on a non-holiday workday between Monday and Friday, inclusive. This survey shall be undertaken at the expense of the developer. The developer will provide the results of each such traffic survey to the Home Park Community

Improvement Association and the City within ten days of completion for review, and will at the same time make the results available to the Home Park neighborhood and to the general public. In the event the results of any such survey show that traffic exceeds a reasonable threshold on State Street, then the developer or its successor shall install a traffic triangle or island on the south leg of the State Street/16th Street intersection to create a right-in only turn onto State Street from 16th Street, and a right-out only turn onto 16th Street eastbound, from State Street. A “reasonable threshold” is defined for the purposes of this condition as a volume of 3,700 AADT (*average annual daily traffic*) or a peak period threshold of 1,000 vehicles per hour. In the event a majority of residents on State Street living between 16th and 14th Streets requests in writing that the City conduct a traffic volume survey at any other time (between the studies conducted as provided above), the developer will not oppose such additional survey but will not be responsible for the cost thereof. The developer will submit plans to the City for all improvements within 60 days after approval of this condition by the Atlanta City Council and will complete such improvements within 90 days after issuance of all necessary permits by the City. The traffic triangle/island will be installed on a similar schedule if and when it is warranted as provided above. The developer will also work with the City of Atlanta and the Loring Heights community to address traffic issues caused by the Atlantic Station development affecting that neighborhood.

Scope and Methodology

To determine whether the change to zoning condition #4 necessitated a SIP revision, we interviewed EPA Region 4 and EPA Office of Transportation and Air Quality officials. We reviewed EPA requirements for SIP and TCM revisions and analyzed the changes to the zoning conditions to determine whether they appeared to increase emissions or undermine the TCM. We also reviewed background material on the Atlantic Steel redevelopment project, including the:

- Final project agreement
- Finding of No Significant Impact
- TCM
- Texts of the original and revised zoning condition #4
- Written communication between Region 4, the City of Atlanta, and community groups

To determine whether Region 4's oversight of the zoning condition change was adequate, we interviewed Region 4 officials regarding their involvement in the revision process. We also reviewed the requirements for EPA oversight under the TCM and the Atlantic Steel Project XL agreement.

We interviewed the complainant to further discuss issues provided to us and to confirm selected information provided by EPA Region 4 officials. This was a limited-scope review designed to meet the objectives as agreed with the complainant.

We conducted our review between June 2004 and November 2004 in accordance with the *Government Auditing Standards*, issued by the Comptroller General of the United States, except as noted above.

EPA Response to the Draft Memorandum

MEMORANDUM

SUBJECT: EPA Region 4 Review of Draft OIG Report, “Review of Changes to the Atlantic Steel Transportation Control Measure” (OIG Assignment Number 2004-001106)

FROM: J. I. Palmer, Jr.
Regional Administrator

TO: J. Rick Beusse
Director for Program Evaluation, Air Issues
Office of Inspector General
Research Triangle Park
Mail Code N283-01

EPA Region 4 has conducted a review of the subject draft report and concurs with all major conclusions and recommendations as outlined in the report. We will develop a strategy to implement all three recommendations as identified on page 7 of the report. It is our intention to present our strategy for additional public notice and outreach to project stakeholders at the next Project XL annual meeting, currently scheduled for the 1st Quarter CY 2005. In addition, we offer the following specific comments for your consideration as you finalize the report:

Background

- Page 1, 1st paragraph, 3rd sentence: Change, “The bridge may increase...” to “The project will increase...” The overall project, not just the bridge itself, will cause an increase in vehicular traffic.
- Page 1, 2nd paragraph, 1st sentence: Insert “in 1999” after “transportation conformity requirements,...” For this section, it is important to have the correct time context.
- Page 2, 2nd paragraph, 3rd sentence: Change sentence to read, “These 18 conditions are identified in the April 10, 2000, proposed rule to approve Georgia’s revised SIP to include the Atlantic Steel TCM.” This improves the wording of this sentence.

EPA Region 4 oversight of changes to zoning conditions...

- Page 5, 1st paragraph, 1st sentence: Change sentence to read, “EPA Region 4 has oversight authority under Project XL and shares oversight authority on the Atlantic Steel TCM with the State of Georgia.” The sentence was unclear related to who has oversight authority. For example, the State of Georgia has no oversight authority under Project XL.
- Page 6, 3rd paragraph, 3rd sentence: Change “As of January 2005,…” to “As of December 2004,…” The developer submitted a permit application on Monday, January 24, 2005, to the City of Atlanta for construction of zoning condition #4 provisions.

If you have questions or need additional information, please contact me or the Region 4 Office of Inspector General liaison, Ms. Dorothy Dimsdale, at (404) 562-8398.

Distribution List

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