

Georgia Department of Natural Resources

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Chris Clark, Commissioner

Environmental Protection Division

F. Allen Barnes, Director

Phone: 404/656-4713 FAX: 404/651-5778

DEC 15 2010

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

RE: Recommended Designations for the Lead National Ambient Air Quality Standard

Dear Ms. Fleming:

On October 15, 2008, the United States Environmental Protection Agency (U.S. EPA) promulgated a revised National Ambient Air Quality Standard for lead. Section 107(d) of the Clean Air Act requires each state to submit to the EPA, no later than one year following promulgation of a new or revised NAAQS, its recommended designation for each area of the State as attainment, non-attainment, or unclassifiable under the standard. On October 9, 2009, the Georgia Environmental Protection Division (EPD) submitted recommended designations in accordance with Section VI, "Implementation Considerations", of the National Ambient Air Quality Standards for Lead; Final Rule, as promulgated November 12, 2008; and U.S. EPA's August 21, 2009 memorandum "Area Designations for the 2008 Revised Lead National Ambient Air Quality Standards." In a letter dated June 14, 2010, U.S. EPA invited EPD to submit updated recommendations by December 15, 2010.

EPD does not have any 2007-2009 lead data that meets the ambient monitoring requirements as revised with the November 12, 2008 lead NAAQS promulgation. However, EPD does have two ambient lead monitors (13-089-0003 in DeKalb County¹ and 13-215-0011 in Muscogee County) that began operating in accordance with these revised monitoring requirements in August 2009, and EPD did establish a "source-oriented" lead monitor in Bartow County (13-015-0003) in December 2009. In addition, EPD may or may not be required to establish a "non-source-oriented" monitor within the Augusta-Richmond County Core Based Statistical Area (CBSA) by January 1, 2011.² Currently, ambient lead measurement data that meets the revised ambient monitoring requirements show 3-month rolling average concentrations well below the NAAQS. An AQS Raw Data Report showing all currently available lead monitoring data is attached. However, since EPD does not have three full years of monitoring data required to calculate a valid design value, EPD is recommending that these areas be designated as

¹ There are two lead monitors located at the DeKalb County site. The monitor with the AQS designation of POC 2 is a backup for the monitor with the AQS designation of POC 1.

² On December, 30, 2009, U.S. EPA proposed revisions to the lead ambient air monitoring requirements. Within this proposal EPA proposed to replace the current non-source-oriented monitoring approach with the requirement for lead monitoring at the NCore sites. Georgia has one Ncore site located in DeKalb County (AQS 13-089-0003). Once these proposed revisions are promulgated, there will no longer be a requirement to establish a non-source-oriented monitor in the Augusta-Richmond CBSA by January 1, 2011. Georgia's recommendations regarding the Augusta-Richmond CBSA are based on this assumption.

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"unclassifiable" in accordance with the November 12, 2008 federal register notice (73 FR 67032) and the August 21, 2009 memorandum. Should future lead monitoring data indicate a violation of the revised lead standard at one or more of these areas, EPD reserves the right to revise the boundary recommendations for nonattainment area(s) in accordance with the eight factors (73 FR 67033) and the three other techniques (73 FR 67034) specified in the November 12, 2008 Federal Register notice.

Georgia EPD recommends that all other counties be designated as "attainment/unclassifiable" for the revised lead standard. **EPD is recommending that no areas in Georgia be designated "nonattainment."**

If you have any questions or need further information, please contact Jac Capp at (404) 363-7016 or Jimmy Johnston at (404) 363-7014.

Sincerely,



F. Allen Barnes
Director

FAB:JB:klc

Attachments

c: Dick Schutt, U.S. EPA Region 4
Jac Capp

**RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES
2008 LEAD NAAQS**

County Name	Designation Recommendation
Appling	Attainment/Unclassifiable
Atkinson	Attainment/Unclassifiable
Bacon	Attainment/Unclassifiable
Baker	Attainment/Unclassifiable
Baldwin	Attainment/Unclassifiable
Banks	Attainment/Unclassifiable
Barrow	Attainment/Unclassifiable
Bartow	Unclassifiable
Ben Hill	Attainment/Unclassifiable
Berrien	Attainment/Unclassifiable
Bibb	Attainment/Unclassifiable
Bleckley	Attainment/Unclassifiable
Brantley	Attainment/Unclassifiable
Brooks	Attainment/Unclassifiable
Bryan	Attainment/Unclassifiable
Bulloch	Attainment/Unclassifiable
Burke	Attainment/Unclassifiable
Butts	Attainment/Unclassifiable
Calhoun	Attainment/Unclassifiable
Camden	Attainment/Unclassifiable
Candler	Attainment/Unclassifiable
Carroll	Attainment/Unclassifiable
Catoosa	Attainment/Unclassifiable
Charlton	Attainment/Unclassifiable
Chatham	Attainment/Unclassifiable
Chattahoochee	Attainment/Unclassifiable
Chattooga	Attainment/Unclassifiable
Cherokee	Attainment/Unclassifiable
Clarke	Attainment/Unclassifiable
Clay	Attainment/Unclassifiable
Clayton	Attainment/Unclassifiable
Clinch	Attainment/Unclassifiable
Cobb	Attainment/Unclassifiable
Coffee	Attainment/Unclassifiable
Colquitt	Attainment/Unclassifiable
Columbia	Attainment/Unclassifiable
Cook	Attainment/Unclassifiable
Coweta	Attainment/Unclassifiable
Crawford	Attainment/Unclassifiable
Crisp	Attainment/Unclassifiable
Dade	Attainment/Unclassifiable
Dawson	Attainment/Unclassifiable

**RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES
2008 LEAD NAAQS**

County Name	Designation Recommendation
Decatur	Attainment/Unclassifiable
DeKalb	Unclassifiable
Dodge	Attainment/Unclassifiable
Dooly	Attainment/Unclassifiable
Dougherty	Attainment/Unclassifiable
Douglas	Attainment/Unclassifiable
Early	Attainment/Unclassifiable
Echols	Attainment/Unclassifiable
Effingham	Attainment/Unclassifiable
Elbert	Attainment/Unclassifiable
Emanuel	Attainment/Unclassifiable
Evans	Attainment/Unclassifiable
Fannin	Attainment/Unclassifiable
Fayette	Attainment/Unclassifiable
Floyd	Attainment/Unclassifiable
Forsyth	Attainment/Unclassifiable
Franklin	Attainment/Unclassifiable
Fulton	Attainment/Unclassifiable
Gilmer	Attainment/Unclassifiable
Glascocock	Attainment/Unclassifiable
Glynn	Attainment/Unclassifiable
Gordon	Attainment/Unclassifiable
Grady	Attainment/Unclassifiable
Greene	Attainment/Unclassifiable
Gwinnett	Attainment/Unclassifiable
Habersham	Attainment/Unclassifiable
Hall	Attainment/Unclassifiable
Hancock	Attainment/Unclassifiable
Haralson	Attainment/Unclassifiable
Harris	Attainment/Unclassifiable
Hart	Attainment/Unclassifiable
Heard	Attainment/Unclassifiable
Henry	Attainment/Unclassifiable
Houston	Attainment/Unclassifiable
Irwin	Attainment/Unclassifiable
Jackson	Attainment/Unclassifiable
Jasper	Attainment/Unclassifiable
Jeff Davis	Attainment/Unclassifiable
Jefferson	Attainment/Unclassifiable
Jenkins	Attainment/Unclassifiable
Johnson	Attainment/Unclassifiable
Jones	Attainment/Unclassifiable

**RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES
2008 LEAD NAAQS**

County Name	Designation Recommendation
Lamar	Attainment/Unclassifiable
Lanier	Attainment/Unclassifiable
Laurens	Attainment/Unclassifiable
Lee	Attainment/Unclassifiable
Liberty	Attainment/Unclassifiable
Lincoln	Attainment/Unclassifiable
Long	Attainment/Unclassifiable
Lowndes	Attainment/Unclassifiable
Lumpkin	Attainment/Unclassifiable
McDuffie	Attainment/Unclassifiable
McIntosh	Attainment/Unclassifiable
Macon	Attainment/Unclassifiable
Madison	Attainment/Unclassifiable
Marion	Attainment/Unclassifiable
Meriwether	Attainment/Unclassifiable
Miller	Attainment/Unclassifiable
Mitchell	Attainment/Unclassifiable
Monroe	Attainment/Unclassifiable
Montgomery	Attainment/Unclassifiable
Morgan	Attainment/Unclassifiable
Murray	Attainment/Unclassifiable
Muscogee	Unclassifiable
Newton	Attainment/Unclassifiable
Oconee	Attainment/Unclassifiable
Oglethorpe	Attainment/Unclassifiable
Paulding	Attainment/Unclassifiable
Peach	Attainment/Unclassifiable
Pickens	Attainment/Unclassifiable
Pierce	Attainment/Unclassifiable
Pike	Attainment/Unclassifiable
Polk	Attainment/Unclassifiable
Pulaski	Attainment/Unclassifiable
Putnam	Attainment/Unclassifiable
Quitman	Attainment/Unclassifiable
Rabun	Attainment/Unclassifiable
Randolph	Attainment/Unclassifiable
Richmond	Attainment/Unclassifiable
Rockdale	Attainment/Unclassifiable
Schley	Attainment/Unclassifiable
Screven	Attainment/Unclassifiable
Seminole	Attainment/Unclassifiable
Spalding	Attainment/Unclassifiable

**RECOMMENDED DESIGNATION STATUS FOR GEORGIA COUNTIES
2008 LEAD NAAQS**

County Name	Designation Recommendation
Stephens	Attainment/Unclassifiable
Stewart	Attainment/Unclassifiable
Sumter	Attainment/Unclassifiable
Talbot	Attainment/Unclassifiable
Taliaferro	Attainment/Unclassifiable
Tattnall	Attainment/Unclassifiable
Taylor	Attainment/Unclassifiable
Telfair	Attainment/Unclassifiable
Terrell	Attainment/Unclassifiable
Thomas	Attainment/Unclassifiable
Tift	Attainment/Unclassifiable
Toombs	Attainment/Unclassifiable
Towns	Attainment/Unclassifiable
Treutlen	Attainment/Unclassifiable
Troup	Attainment/Unclassifiable
Turner	Attainment/Unclassifiable
Twiggs	Attainment/Unclassifiable
Union	Attainment/Unclassifiable
Upson	Attainment/Unclassifiable
Walker	Attainment/Unclassifiable
Walton	Attainment/Unclassifiable
Ware	Attainment/Unclassifiable
Warren	Attainment/Unclassifiable
Washington	Attainment/Unclassifiable
Wayne	Attainment/Unclassifiable
Webster	Attainment/Unclassifiable
Wheeler	Attainment/Unclassifiable
White	Attainment/Unclassifiable
Whitfield	Attainment/Unclassifiable
Wilcox	Attainment/Unclassifiable
Wilkes	Attainment/Unclassifiable
Wilkinson	Attainment/Unclassifiable
Worth	Attainment/Unclassifiable