



November 14, 2005

Mr. Ron Methier, Branch Chief  
Air Protection Branch  
Georgia Environmental Protection Division  
4244 International Parkway, Suite 120  
Atlanta, Georgia 30354

SUBJECT: GIEC Comments on Proposed Amendments to Rule 391-3-1-.02  
"Prevention of Significant Deterioration of Air Quality"

Dear Mr. Methier:

The Georgia Industry Environmental Coalition<sup>1</sup> (GIEC) appreciates this opportunity to submit comments to the Georgia Environmental Protection Division (EPD) on its proposed revisions to Georgia's Rules for Air Quality Control, Chapter 391-3-1, which were public-noticed October 2, 2005.

GIEC acknowledges the time and effort devoted by EPD to listening to all stakeholder representatives and responding to concerns in drafting the rules. Generally, GIEC believes that these rules will move Georgia towards a cleaner environment and a healthier, competitive business climate in the years ahead.

Specific comments are listed below.

In the definition of "baseline actual emissions," paragraph 391-3-1-.02 (7)(a)2.(i)(II)V, the term "inadequate information" is used twice, but is not defined as to what constitutes adequacy or what would be the standard for making the determination. GIEC requests that the Division provide more clarification on the minimum requirement for adequate information to support a baseline emission rate.

In the definition of "projected actual emissions," paragraph 391-3-1-.02 (7)(a)2.(ii)(II)II, the opening statement should be modified to clarify the available options: "Shall include fugitive emissions to the extent quantifiable and emissions associated with startups, shutdowns, and malfunctions; or *omit those emissions, using one of the following options:*"

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<sup>1</sup> Formed in 1992, GIEC is a not-for-profit organization of Georgia industries whose member companies are subject to environmental regulations in Georgia. GIEC's mission is to serve as a technically-based advocate for Georgia industry by promoting environmental regulations and policies founded on protection of human health and the environment; sound science; and cost/benefit principles. Many of our member companies represent the largest employers in the State and collectively represent an employee-base that exceeds 55,000 and include: Arizona Chemical Company; AGL Resources; Colonial Terminals, Inc.; DSM Chemicals North America, Inc.; Engelhard Corporation; General Electric Company; General Motors; Georgia-Pacific Corporation; Georgia Power Company; Gold Kist Inc.; International Paper; Kerr-McGee Pigments, Inc.; Lockheed Martin Aeronautics Company; Merck & Company, Inc.; Mohawk Industries; Norfolk Southern Corporation; NutraSweet; Omnova Solutions, Inc.; Southern Aluminum Finishing Company; Southwire; Weyerhaeuser Company; and The William L. Bonnell Co., Inc.

In the definition of a non-EGU "replacement unit," paragraph 391-3-1-.02 (7)(a)2.(ix)(II), GIEC suggests this should also be the maximum hourly design rate for the unit in question, consistent with the definition for steam electric generating facilities. The resulting language would then read: "...maximum *hourly* rate of fuel or heat input, maximum *hourly* rate of material input, or maximum *hourly* rate of product output."

In paragraph 391-3-1-.02 (7)(b)15.(i)(III), GIEC requests the following be inserted after the word "monitor" to expand the means of calculating annual emissions: "..., *test, or estimate using correlated operation or emission control parameters in a manner acceptable to the Division, ...*"

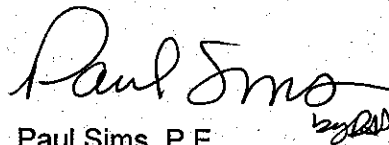
GIEC urges EPD to finalize these rules and encourages the Board of Natural Resources to adopt them in a timely manner. This will allow for more time to implement the rules in a manner that is best for Georgia.

Sincerely,

GEORGIA INDUSTRY ENVIRONMENTAL COALITION, INC.



Mark D. Johnson  
Member, GIEC Board



Paul Sims, P.E.  
Member, GIEC Board