



July 25, 2022 via electronic mail

Georgia Department of Natural Resources,
 Environmental Protection Division
 4244 International Parkway, Suite 120
 Atlanta, GA 30354-3906
EPDComments@dnr.state.ga.us

Comments regarding draft regional haze state implementation plan

Dear Georgia Environmental Protection Division,

We write today out of a shared value for clean air and the public lands that are protected under the Clean Air Act’s Regional Haze Rule. Georgia EPD has the opportunity right now to significantly improve its haze plan and reduce the amount of air pollution harming beloved spaces like Okefenokee, Wolf Island, and Cohutta Wilderness Area. Despite strides made toward cleaner air over the years, the state of Georgia still has much work to do. The proposed regional haze plan fails to adequately reduce pollution and ensure continued reasonable progress toward the goal of restoring naturally clean air in Class I areas. The plan also misses the mark in failing to consider the intersections of industrial haze pollution and existing environmental injustices. Overall, the plan falls short of the state’s obligation to improve air quality for our parks, their visitors and local communities.

Despite the thousands of tons of controllable pollution from Georgia’s industrial sources including coal-fired power plants, paperboard mills and pulp mills, and the many opportunities for cost effective controls, Georgia EPD improperly concludes that almost no new reductions in haze pollution are warranted. In its reliance on the Southeast regional planning organization (RPO) Visibility Improvement States and Tribal Association of the Southeast (VISTAS) work, Georgia EPD improperly selected only three facilities to review and wrongly excluded many large polluting facilities in the state. Furthermore, Georgia EPD failed to consider the harms of its industrial pollution on the Great Smoky Mountains National Park as well as nitrogen oxides and particulate matter emissions from the myriad polluting facilities across the state.

We urge Georgia EPD to fully analyze for emission controls the other major polluting sources that were previously identified in stakeholder comments from the National Parks Conservation Association in the final haze plan. These include:

- Ga Power Company - Plant Scherer
- International Paper Company (Rome Linerboard Mill)
- Georgia-Pacific Cedar Springs, LLC
- Ga Power Company - Plant Wansley
- Georgia-Pacific Consumer Products LP (Savannah River Mill)
- Rayonier Performance Fibers, LLC¹
- International Paper - Augusta Mill
- PCA Valdosta Mill
- C-E Minerals Plants 1, 2 and 6
- Graphic Packaging Macon Mill
- Weyerhaeuser NR Port Wentworth
- Interstate Paper, LLC
- Weyerhaeuser NR Company - Flint River Operations
- Transcontinental Gas Pipeline Company, LLC - Compressor Station
- Green Power Solutions of Georgia, LLC
- CEMEX Southeast, LLC
- Pinova, Inc.
- Thermal Ceramics

It is imperative that NOx emissions are considered and addressed from each of the sources that EPD analyzed as well as the aforementioned sources. It should also be noted that ten of the most egregious haze polluters are in areas where most of the population are people of color and already suffering environmental injustices of localized and chronic air pollution exposure. It is of vital importance that environmental justice considerations be considered, as communities of color are hurt first and worst when it comes to burdens like air pollution. Residents of Georgia are already dealing with the harms of chronic air pollution burdens. EPA's July 2021 Clarification Memo reinforces that equity and justice concerns should be considered in this round of haze planning. We ask that before finalizing this plan, Georgia EPD please take the time to correct these harmful oversights.

If left unchanged, the state's plan will not comply with the Federal Clean Air Act and the United States Environmental Protection Agency's (EPA) Regional Haze Rule as it does little to limit haze pollution and fails to help restore naturally clean air. It is stated in Georgia EPD's mission that it is your responsibility to pursue a sustainable environment that provides a foundation for a vibrant economy and healthy communities. The same pollutants causing hazy skies are detrimental to the health of communities in the area and the people who recreate in Georgia's public lands, boosting the state's tourism revenue during their visits. Please do not overlook this opportunity to improve air quality for future generations and protect the health of all who live here and enjoy Georgia's treasured public lands.

Thank you,

Elise Bennett, Deputy Florida Director & Senior Attorney
Center for Biological Diversity

Christian Hunt, Southeast Program Representative
Defenders of Wildlife

Dr. Treva Gear, Georgia Campaign Manager
Dogwood Alliance

Jennette Gayer, Director
Environment Georgia

Jared Teutsch, Executive Director
Georgia Audobon

Brionté McCorkle, Executive Director
Georgia Conservation Voters

Lynn Snyder, Co-President
Georgia Women (and Those Who Stand With Us)

Rachael Thompson, Executive Director
Glynn Environmental Coalition

Anne Mellinger-Birdsong, Medical Advisor
Mothers & Others For Clean Air

Lilly Anderson, Southeast Clean Air Coordinator
National Parks Conservation Association

Jonathan Andrew, Florida Refuge Liaison
National Wildlife Refuge Association

Susan Inman, Mid Coast Advocate
One Hundred Miles

Chris Bertrand, Riverkeeper and Executive Director
Satilla Riverkeeper

Charline Whyte, Senior Representative for the Beyond Coal Campaign
Sierra Club

Jennifer Whitfield, Senior Attorney
Southern Environmental Law Center

Antwon Nixon, Founder
Sowing Seeds Outside The Walls