GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Protection Branch
Ambient Monitoring Program

Second Addendum to 2023 Ambient Air Monitoring Plan

Per the Environmental Protection Agency regulations, the Georgia Ambient Air Monitoring Program (GA AAMP) produces an annual network monitoring plan to show how the ambient air monitoring requirements are met (40 CFR 58.10). If that plan is modified during the year after it is published, it is the state's responsibility to let the public know of those modifications. Since the publication of the *2023 Ambient Air Monitoring Plan* in June 2023, the GA AAMP is in the process of making the following changes to the ambient air monitoring network. For more information regarding the *2023 Ambient Air Monitoring Plan*, refer to the GA AAMP website at https://airgeorgia.org/networkplans.html.

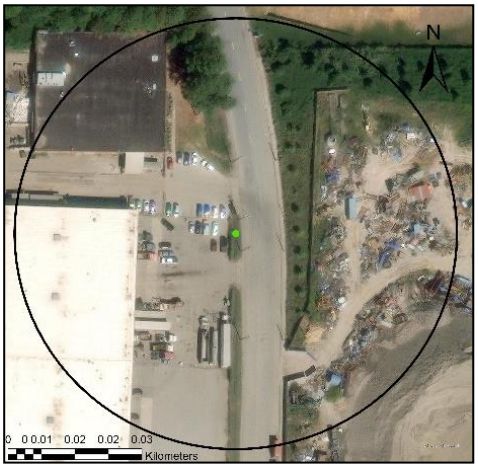
For the following site changes, GA AAMP worked closely with EPA Region 4 to find a suitable monitoring location for the ambient air monitoring equipment. Obstructions, monitoring path and fetch, distances from roadways, power availability, and access for staff are all considered when considering the feasibility of a potential site. All GA AAMP sites must be selected such that the requirements of 40 CFR 58 Appendix E are met upon the site being commissioned. This addendum will cover the establishment of a new site to monitor lead in the Atlanta area within Fulton County. In addition, it will cover a request for a waiver for the siting criteria of this new lead site.

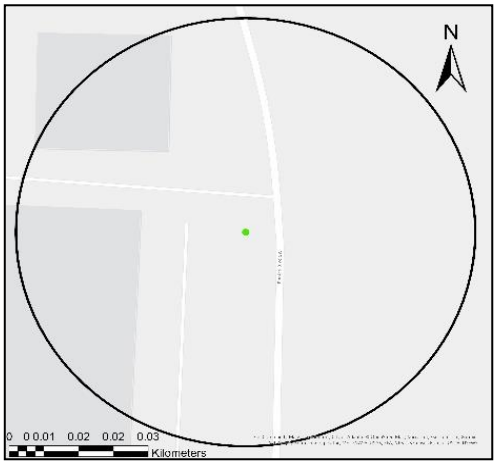
New Site in Atlanta

In accordance with 40 CFR 58.10 regarding modifications to the *2023 Ambient Air Monitoring Plan*, the GA AAMP provides the following documentation in support of establishing a new site in Atlanta within Fulton County, in the Atlanta-Sandy Springs-Alpharetta MSA. The new site ID will be 13-121-0057. The GA AAMP will have collocated lead monitors at this site. The primary lead data will be collected on a 1 in 6 day sampling schedule, while the collocated lead data will be collected on a 1 in 12 day sampling schedule, both utilizing monitors with the EPA Manual Equivalent Method EQL-0995-110. The lead samples will be analyzed with the Inductively Coupled Plasma/Mass Spectrometry (ICP/MS) laboratory analysis method. The lead data will be compared to the National Ambient Air Quality Standards (NAAQS) and submitted to the EPA's Air Quality System (AQS). The following information shows the site details for the new site.

New site details:

Empire Blvd





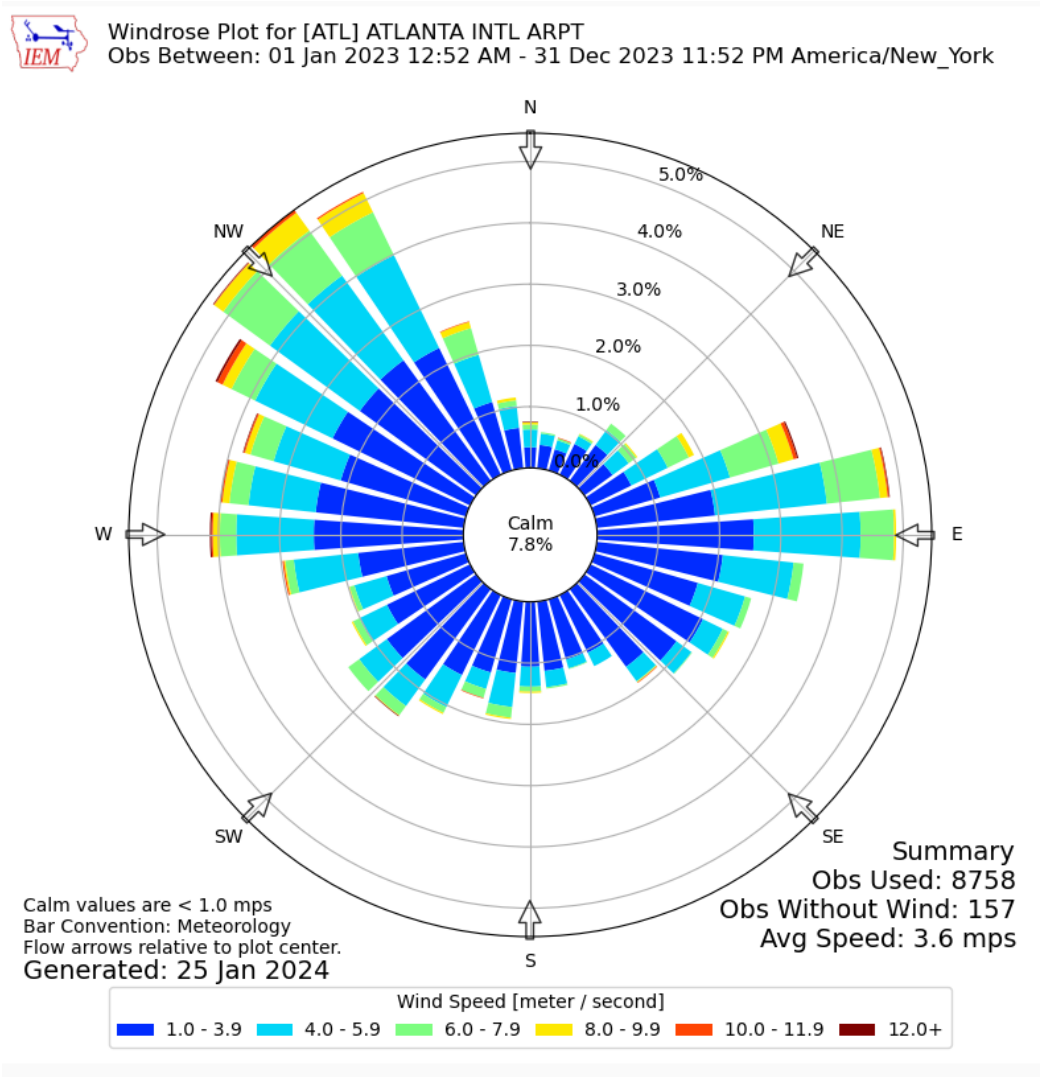
AQS ID: 131210057
Address: 3325 Empire Blvd SW, Atlanta, GA 30354
Site Established: To be determined
Latitude/Longitude: N33.664476, W-84.391869
Elevation: 280 meters
Area Represented: Atlanta-Sandy Springs-Alpharetta
MSA Site History: Established as Lead site

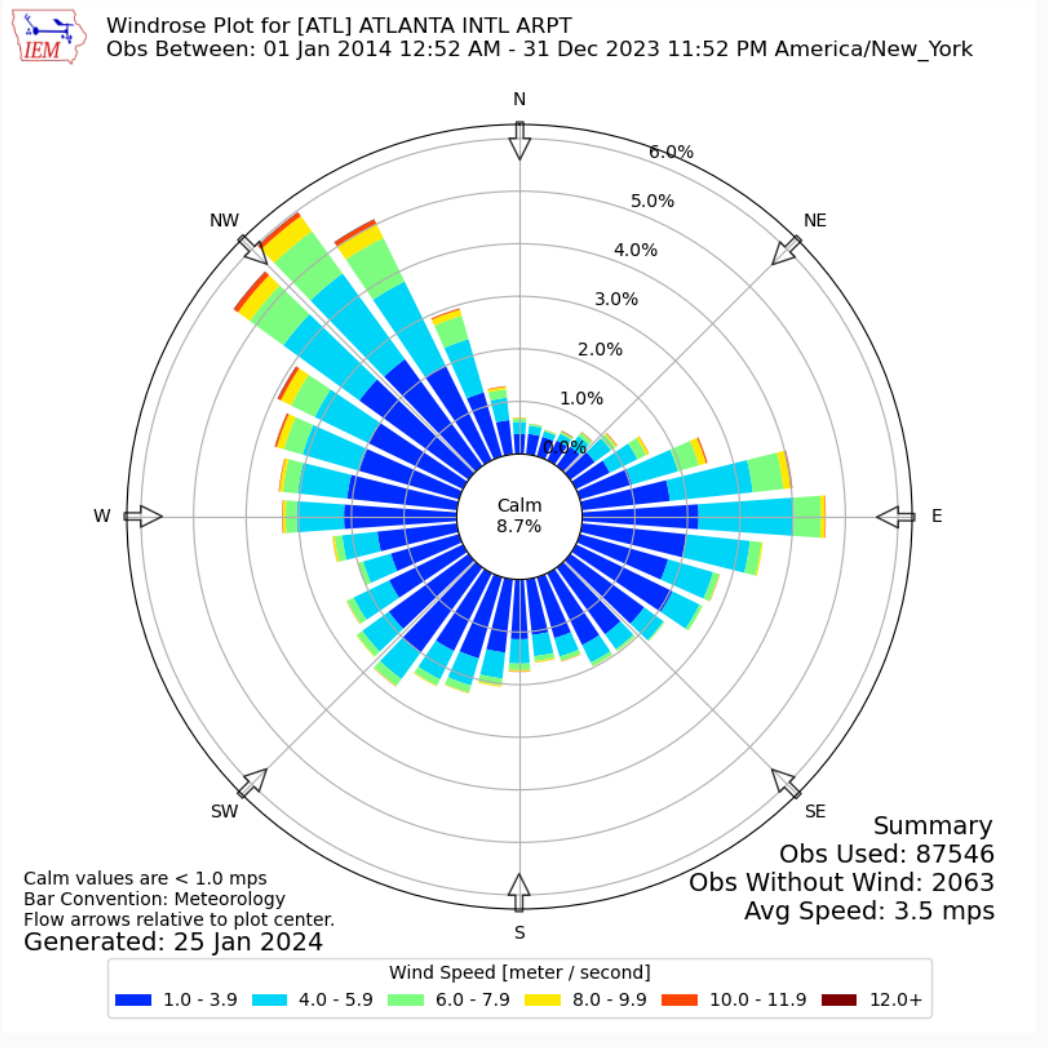
North South East West

Parameter	Monitoring Objective	Sampling Schedule	Probe Inlet Height	Spatial Scale	Begin Date
Lead	Source Oriented	Every 6 days	2 m	Micro	TBD
Lead	Quality Assurance	Every 12 days	2 m	Micro	TBD

TBD: To be determined when building the new site is complete.

The following windroses show the annual average for January 1, 2023 through December 31, 2023 and a 10-year average from January 1, 2014 through December 31, 2023, respectively. These windroses were considered when selecting the new location at the Empire Blvd site.




Windrose Plot for [ATL] ATLANTA INTL ARPT
Obs Between: 01 Jan 2014 12:52 AM - 31 Dec 2023 11:52 PM America/New_York
N
NE
E
SE
S
SW
W
NW
6.0%
5.0%
4.0%
3.0%
2.0%
1.0%
0.0%
Calm
8.7%
Summary
Obs Used: 87546
Obs Without Wind: 2063
Avg Speed: 3.5 mps
Calm values are < 1.0 mps
Bar Convention: Meteorology
Flow arrows relative to plot center.
Generated: 25 Jan 2024
Wind Speed [meter / second]
1.0 - 3.9
4.0 - 5.9
6.0 - 7.9
8.0 - 9.9
10.0 - 11.9
12.0+

The next map shows five proposed locations (in yellow) that GA AAMP considered when deciding on the new location. Site B would be on a roof, which is a safety concern for the Site Operators/Field Auditors. Site C is adjacent to trees, and the height of the wall may cause an obstruction to wind flow. Site D is difficult to access, and it would require clearing heavy vegetation from the area. Additionally, at Site D the height of the trees and wall may cause an obstruction to wind flow (similar to Site C). Because Site E is more secluded, the location gives rise to safety and security concerns. Therefore, after considering the locations, Site A is the best option. Site A is close to a power source, the existing fence can be tied into the new fence that would be built, and the Site Operators/Field Auditors would have direct, visible access for safety and security, without clearing heavy vegetation. The site will allow for unrestricted airflow of at least 270 degrees around the samplers.

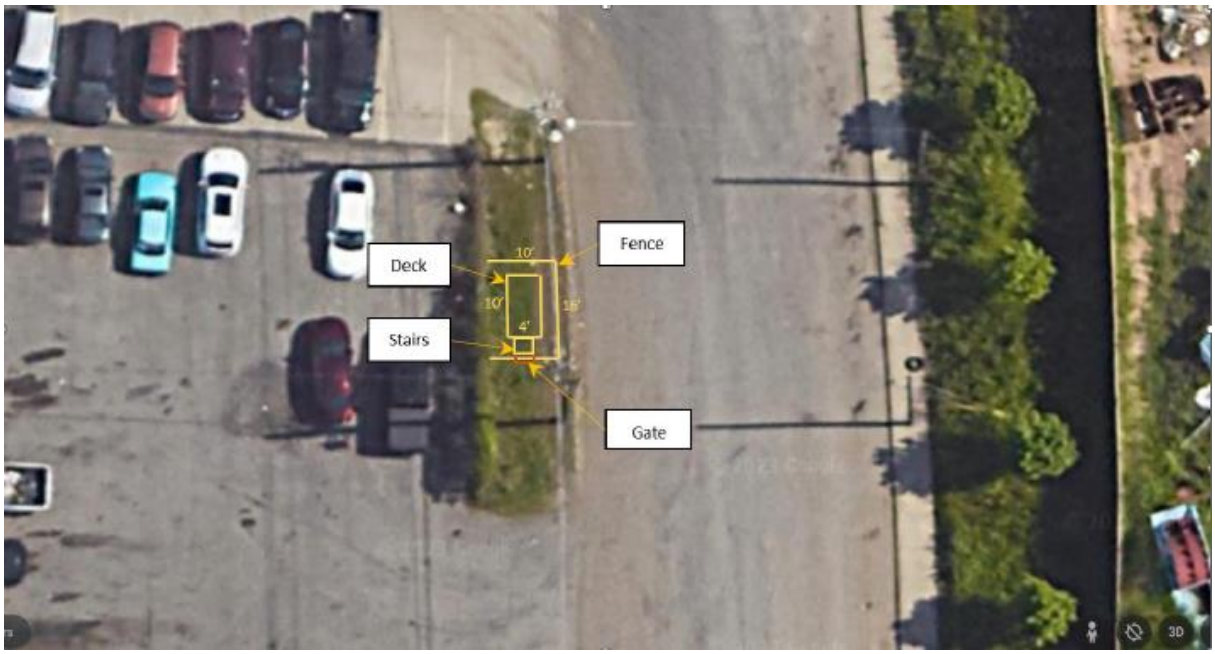
The next photos show sites B, C, D and E that were considered for possible monitoring locations.


D

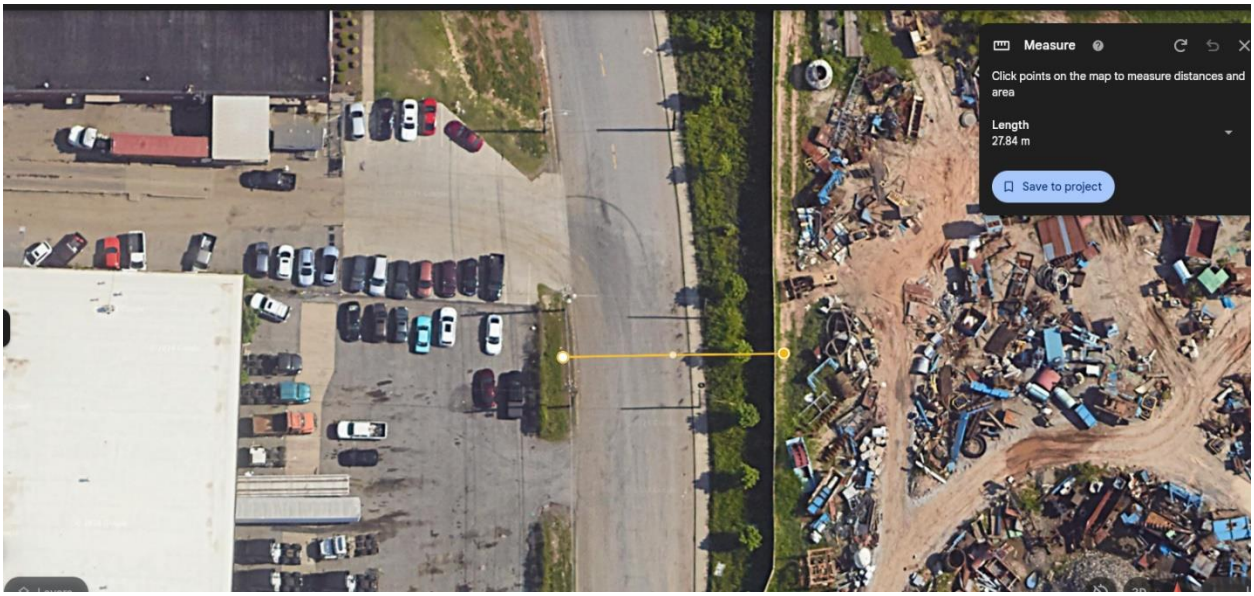

E

The following image is an aerial view of the proposed monitoring Site A.

The following image shows a detailed view of the proposed fence, deck, stairs and gate. The wooden deck will be 3-foot-tall with wood railing and stairs. The fence will tie into the already existing fence by installing an 8-foot-tall, galvanized chain link fence with barbed wire on top and a 3-foot-tall walk gate. The vegetative growth will be removed along the existing fence.

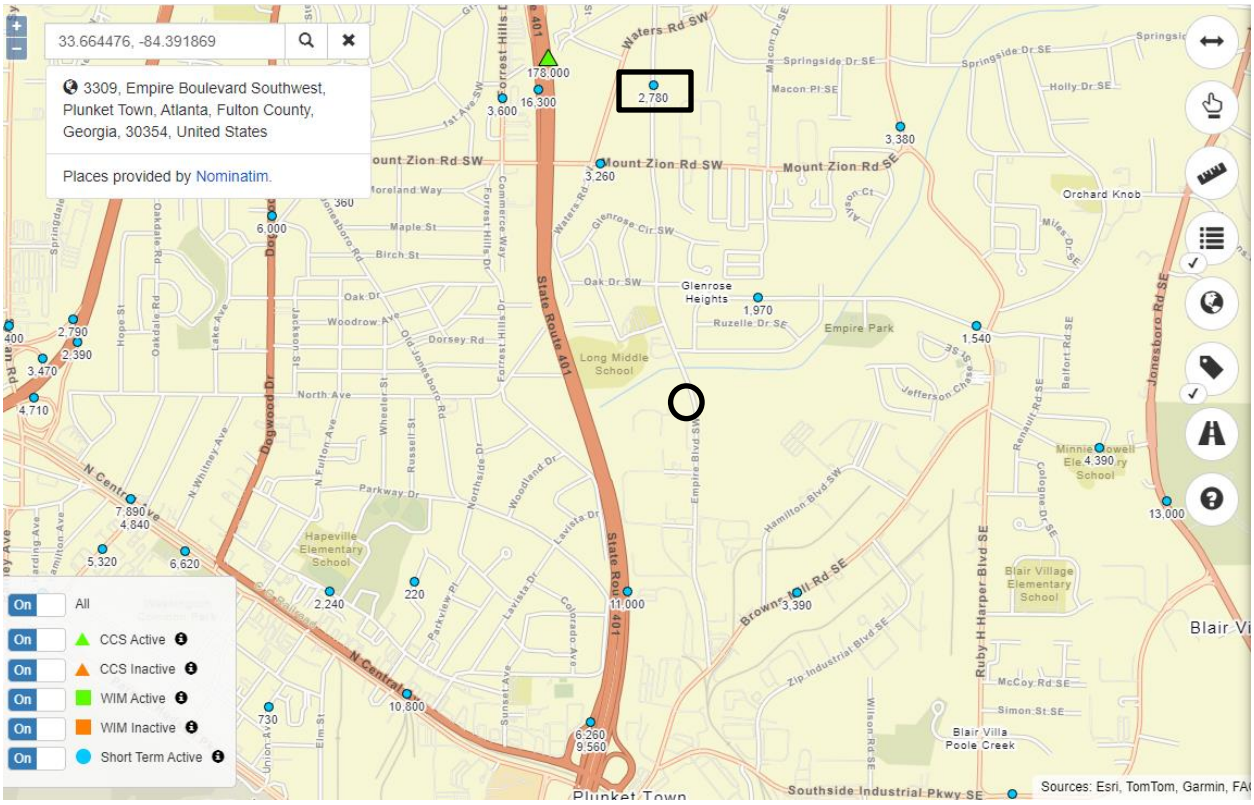


The following image depicts the distance from the wall to the proposed site (Site A). The approximate measured distance (symbolized by the yellow line) reads 27.84 meters, as stated via the measuring tool in the top right corner on the image in Google Earth.



In addition, the distance from the proposed lead monitoring site to the tree located directly across the street and in front of the wall is approximately 20.08 meters (also shown with a yellow line), as shown in the image below.

The map below is from the Georgia Department of Transportation (GA DOT) (https://gdottrafficdata.drakewell.com/publicmultinodemap.asp) and shows the traffic counts in the area. The black circle shows the location of the proposed lead monitoring site in Atlanta. The closest approximate annual average daily traffic (AADT) count is 2,780, indicated by the black rectangle.



Waiver Request

Per 40 CFR Part 58, Appendix E, Section 10, GA AAMP is requesting a waiver for the location of the monitors at the new Empire Blvd site. Due to logistics of the microscale site, the monitors will be approximately 1-2 meters from the nearest road (Empire Blvd). After much consideration and discussion with EPA, GA AAMP and EPA are in agreement that the road has minimal impact on the air monitors and representative of the microscale. Empire Blvd has less than approximately 2,780 annual average daily traffic count, as shown on the above map from GA DOT. In addition, as explained above, after much examination of the property, the monitors cannot reasonably be located in another area to minimize safety concerns and have the least amount of unobstructed wind flow in the vicinity.

Comments

The following section includes a copy of the comments that were received during the public notice and comment period from February 6, 2024 through March 8, 2024 for the *Draft Second Addendum to 2023 Ambient Air Monioring Plan*. GA AAMP's responses to these comments are shown after the comments.

William S. "Buddy" Cox, III
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Bradley

March 8, 2024

VIA REGULAR MAIL AND EMAIL

Air Protection Branch
ATTN: Annual Air Monitoring Plan Comments
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Air Protection Branch
ATTN: Jaime Gore
Program Manager of the Ambient Monitoring Program
4244 International Parkway, Suite 120
Atlanta, Georgia 30354
Jaime.Gore@dnr.ga.gov

EPD.comments@dnr.ga.gov

Re: ***Draft Second Addendum to 2023 Ambient Air Monitoring Plan***

To Whom It May Concern:

Thank you for the opportunity to provide public comment on the draft *Second Addendum to 2023 Ambient Air Monitoring Plan* (the "Second Addendum") that the Georgia Environmental Protection Division ("GA EPD") plans to issue to the U.S. Environmental Protection Agency ("EPA"). This firm represents TAV Holdings, Inc. ("TAV"), which operates a facility located on Hollow Tree Lane and Empire Boulevard SW, in Atlanta, Georgia.

We understand the Second Addendum seeks to establish a new site in Hapeville, Georgia within Fulton County, Georgia and proposes to place ambient air monitoring equipment at 3325 Empire Boulevard SW, Atlanta, Georgia, which abuts TAV's facility. Please note that this address is not within the city limits of Hapeville; this address is Atlanta. We also understand the Georgia Ambient Air Monitoring Program ("GA AAMP"), in conjunction with EPA, considered five proposed locations when deciding on the proposed location. As discussed below, this proposed location, Site A, still presents several challenges.

While the Second Addendum acknowledges the closest approximate annual average daily traffic count is 2,780, according to the Georgia Department of Transportation, it does not account for the type of traffic in this area. Empire Boulevard SW, and in particular, the area of Empire Boulevard SW where the ambient air monitoring equipment is proposed to be located, is lined by several industrial and commercial businesses, which utilize large diesel semi-trucks, often idling in the road waiting to gain access to a facility.

Additionally, as you know, TAV is currently under a Unilateral Administrative Order issued by EPA on January 10, 2022, pursuant to section 7003(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6973(a) (the "UAO"). As a requirement of the UAO, TAV has prepared work plans to address site stabilization, material management, and waste disposal procedures and health and safety. Pursuant to these plans and procedures, which have been communicated to, and reviewed by, EPA at length, TAV has implemented a practice of sweeping, scraping, vacuuming, or otherwise collecting in-process materials from Empire Boulevard SW at least once per shift, and on an as-needed basis as determined by the equipment operator, to reclaim any material lost in transport. The proposed location of the ambient air monitoring equipment is directly adjacent to these operations, and accordingly, there is potential for the data from the monitor to insufficiently represent the ambient air in the area.

The ambient air monitoring equipment's proposed location is situated between two parking lots. The ambient air monitoring equipment would include emissions from vehicles entering and leaving the parking lots, including large trucks, potentially leading to in inaccurate and unreliable lead sampling and lead data. Additionally, the ambient air monitoring equipment would be located near power lines, which would further result in inaccurate and unreliable lead sampling and lead data.

Finally, GA AAMP has prepared a written waiver request in accordance with 40 C.F.R. Part 58, Appendix E, which recognizes there may be situations where "some deviation from the siting criteria may be necessary[.]" However, GA AAMP's proposed deviation is significant and will almost certainly lead to concerns regarding the validity of the resulting monitoring data. GA AAMP explains the ambient air monitoring equipment will be located approximately one (1) to two (2) meters from the nearest road, which is Empire Boulevard, and that together, GA AAMP and EPA have concluded "the road has minimal impact on the air monitors[.]" As discussed above, this is not an accurate statement.

For these reasons, it does not appear the proposed location satisfies the requirements of 40 C.F.R. Part 58, Appendix E. Again, we appreciate the opportunity to provide public comment and look forward to hearing from you soon.

Very truly yours,

/s/ Buddy Cox

William S. "Buddy" Cox, III

WSC/db

cc: Delaney Beier (*dbeier@bradley.com*)
Katie Gregory (*katie@kbncstrategies.com*)
Brent Fairchild (*bfairchild@tavholdingsinc.com*)

GA AAMP has read and acknowledges that the above comments were received regarding the establishment of a lead ambient air monitoring site near TAV Holdings, Inc. in the Atlanta area. GA AAMP appreciates the comments, and the following text includes GA AAMP's responses to the comments.

Comment Regarding the Address:
Please note that this address is not within the city limits of Hapeville; this address is Atlanta.

GA AAMP Response:
The references to a Hapeville address have been changed to Atlanta. In addition, the site name has been changed to 'Empire Blvd'.

Comment Regarding Type of Traffic and Surrounding Area:
While the Second Addendum acknowledges the closest approximate annual average daily traffic count is 2,780, according to the Georgia Department of Transportation, it does not account for the type of traffic in this area. Empire Boulevard SW, and in particular, the area of Empire Boulevard SW where the ambient air monitoring equipment is proposed to be located, is lined by several industrial and commercial businesses, which utilize large diesel semi-trucks, often idling in the road waiting to gain access to a facility.

GA AAMP Response:
The purpose of the ambient air monitoring site is to monitor lead levels in the area. Diesel fuels do not contain lead. Leaded gasoline was banned in motor vehicle gasoline starting January 1, 1996 (https://www.atsdr.cdc.gov/csem/leadtoxicity/what_lead.html#:~:text=In%20the%20United%20States%2C%20lead,1996%2C%20due%20to%20health%20concerns). According to EPA's information regarding diesel fuels (https://www.epa.gov/diesel-fuel-standards/about-diesel-fuels), lead is not listed as a pollutant that is regulated in diesel fuel. In addition, the location has been approved by EPA, and it is the most feasible site to monitor ambient air lead levels in the area.

Comment Regarding Cleaning Procedures Pursuant to the Unilateral Administrative Order:
As a requirement of the UAO, TAV has prepared work plans to address site stabilization, material management, and waste disposal procedures and health and safety. Pursuant to these plans and procedures, which have been communicated to, and reviewed by, EPA at length, TAV has implemented a practice of sweeping, scraping, vacuuming, or otherwise collecting in-process materials from Empire Boulevard SW at least once per shift, and on an as-needed basis as determined by the equipment operator, to reclaim any material lost in transport. The proposed location of the ambient air monitoring equipment is directly adjacent to these operations, and accordingly, there is potential for the data from the monitor to insufficiently represent the ambient air in the area.

GA AAMP Response:
Due to logistical limitations, this is the most feasible location for the ambient air lead monitor. EPA has approved GA AAMP's choice of location, which is intended to collect data in relation to all procedures in the area affecting ambient air. In addition, EPA has approved the GA AAMP's Quality Assurance Project Plan for this project, ensuring quality ambient air data will be collected and used by EPA.

Comment Regarding Siting Location Concerns:
The ambient air monitoring equipment's proposed location is situated between two parking lots. The ambient air monitoring equipment would include emissions from vehicles entering and leaving the parking lots, including large trucks, potentially leading to inaccurate and unreliable lead sampling and lead data. Additionally, the ambient air monitoring equipment would be located near power lines, which would further result in inaccurate and unreliable lead sampling and lead data.

GA AAMP Response:
Due to logistical limitations, this is the most feasible location for the ambient air lead monitor. EPA has approved GA AAMP's choice of location and the GA AAMP's Quality Assurance Project Plan for this project, ensuring quality ambient air data will be collected and used by EPA.

Comment Regarding Waiver Request and Siting Location Concerns:
GA AAMP has prepared a written waiver request in accordance with 40 C.F.R. Part 58, Appendix E, which recognizes there may be situations where "some deviation from the siting criteria may be necessary[.]" However, GA AAMP's proposed deviation is significant and will almost certainly lead to concerns regarding the validity of the resulting monitoring data. GA AAMP explains the ambient air monitoring equipment will be located approximately one (1) to two (2) meters from the nearest road, which is Empire Boulevard, and that together, GA AAMP and EPA have concluded "the road has minimal impact on the air monitors[.]" As discussed above, this is not an accurate statement.

GA AAMP Response:
Due to logistical limitations, this is the most feasible location for the ambient air lead monitor. EPA has approved GA AAMP's choice of location and the GA AAMP's Quality Assurance Project Plan for this project, ensuring quality ambient air data will be collected and used by EPA.