



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor
Allen Biaggi, Director
Leo M. Drozdoff, P.E., Administrator

December 4, 2007

Mr. Wayne Natri
Regional Administrator
OAR-1, USEPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Recommended designations for the 24-Hour PM_{2.5} National Ambient Air Quality Standards (NAAQS) (71 Federal Register 61144, October 17, 2006)

Dear Mr. Natri:

On behalf of Governor Gibbons, as his appointed designee, pursuant to Section 107(d) of the 1990 Clean Air Act, I am submitting this letter requesting that the State of Nevada be designated attainment or unclassifiable for the 24-hour PM_{2.5} NAAQS, as follows:

- Hydrographic Area 87 (Reno planning area), Attainment
- Hydrographic Area 212 (Las Vegas planning area), Attainment
- Hydrographic Area 216 (Garnet Valley), Attainment
- Hydrographic Area 164A (Ivanpah Valley, Northern Part), Attainment
- All remaining hydrographic areas in the State of Nevada: Unclassifiable

The Air Quality Management Division of the Washoe County District Health Department has reviewed 2004-2006 data and determined that hydrographic area 87 in Washoe County is in attainment of the 24-hour PM_{2.5} standard. A copy of their letter is enclosed. Similarly, the Department of Air Quality and Environmental Management in Clark County has reviewed 2004-2006 data and determined that hydrographic areas 212, 216 and 164A in Clark County are in attainment of the 24-hour PM_{2.5} standard. A copy of their letter is enclosed. The Nevada Division of Environmental Protection recommends that the rest of the hydrographic areas in the State be designated as unclassifiable, as there is no data stored in the EPA Air Quality System for these areas.

Please contact Michael Elges at (775) 687-9329, if you have any questions you would like to discuss.

Sincerely,

Leo M. Drozdoff, P.E.
Administrator



December XX, 2007

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cc: Michael Dayton, Chief of Staff, Office of the Governor
Jodi Stephens, Legislative Assistant, Office of the Governor
Allen Biaggi, Director, DCNR
Michael Elges, Chief, Bureau of Air Quality Planning, NDEP
Greg Remer, Chief, Bureau of Air Pollution Control
Andrew Goodrich, Director, AQMD, Washoe County District Health Department
Lewis Wallenmeyer, Director, Clark County DAQEM
Lisa Hanf, Chief, Planning Office, USEPA Region IX (AIR-2)

Certified Mail: 7006 3450 0000 5064 3962



Department of Air Quality & Environmental Management

500 S Grand Central Parkway 1st Fl • Box 555210 • Las Vegas NV 89155-5210
(702) 455-5942 • Fax (702) 383-9994

Lewis Wallenmeyer, Director • Alan Pinkerton, Assistant Director • Tina Gingras, Assistant Director

November 21, 2007

Colleen
Mike

Mr. Leo Drozdoff, P.E., Administrator
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701-5249

Nevada
Environmental Protection

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BAPC / BAQP

ENVIRONMENTAL PROTECTION

Re: Recommendation of Designation for the Federal PM_{2.5} Standard – Clark County

Dear Mr. Drozdoff:

We have reviewed the relevant data in accordance with the particulate matter-2.5 (PM_{2.5}) National Ambient Air Quality Standards (NAAQS) final rule (40 CFR Part 50, 10/17/06), and determined that Clark County is in attainment of the annual and 24-hour PM_{2.5} standards. Quality-assured data from all PM_{2.5} Federal Reference Monitors operated by the Clark County Department of Air Quality and Environmental Management between 2004 and 2006 demonstrate that the annual average and 98th-percentile 24-hour design values are in compliance with the PM_{2.5} standards. All data sets exceeded the U.S. Environmental Protection Agency's (EPA's) 75 percent data adequacy standards. Therefore, we recommend that Clark County be designated as an unclassifiable/attainment area.

Clark County operates PM_{2.5} FRM samplers in Hydrographic Areas 212, 216, and 164A. The Green Valley, Sunrise Acres, and J.D. Smith monitoring sites are located in Hydrographic Area 212; the Apex monitoring site is located in Hydrographic Area 216; and the Jean monitoring site is located in Hydrographic Area 164A. DAQEM monitoring network assessments have not justified placement of PM_{2.5} FRM samplers in other hydrographic areas in Clark County.

We have enclosed the monitoring data for the ambient sites in Clark County for your review. If you have any questions or need more information on any items related to this issue, please contact Dennis Ransel at (702) 455-1660. Thank you for your consideration in this matter.

Sincerely,

Lewis Wallenmeyer

Enclosure: PM_{2.5} monitoring data for Clark County

cc: Mike Elges, NDEP
Jacob Snow, RTC
Phil Rosenquist, Clark County Manager's Office

ENCLOSURE 1:

PM_{2.5} (FRM) Quality-Assured Data Analysis for 2004-2006

Annual Standard = 15 µg/m³				
Site	2004	2005	2006	3-Yr Average
Apex (0022)	3.959	4.052	3.871	4.0 µg/m³
Green Valley (0298)	5.586	5.645	5.895	5.7 µg/m³
EC - Sunrise Acres (560/561)	9.328	9.373	8.736	9.2 µg/m³
J.D. Smith (2002)	8.655	8.178	8.152	8.3 µg/m³
Jean (1019)	3.443	3.816	3.529	3.6 µg/m³
24-Hour Standard = 35 µg/m³ (PM_{2.5} FRM 98th Percentile)				
Site	2004	2005	2006	3-Yr Design Value
<i>24-hr Design Values: 2004-2006</i>				
Apex	7.9	10.2	9.8	9.3 µg/m³
Green Valley	10.3	14.2	11.5	12.0 µg/m³
EC - Sunrise Acres	26.7	27.4	23.9	26.0 µg/m³
J.D. Smith	20.1	21.0	22.1	21.1 µg/m³
Jean	6.9	9.7	8.5	8.4 µg/m³



DISTRICT HEALTH DEPARTMENT

AIR QUALITY MANAGEMENT DIVISION

Allen



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November 27, 2007

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Mr. Leo M. Drozdoff, P.E.
Administrator
Department of Conservation and Natural Resources
Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

Subject: Area Designations for the Revised 24-hour Fine Particulate National Ambient Air Quality Standard

Dear Mr. Drozdoff:

The U.S. Environmental Protection Agency (EPA) promulgated a revised National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM_{2.5}) on October 17, 2006 (71 FR 61144). Pursuant to Section 107(d) of the Clean Air Act, the governor of each state is to recommend area designations to the EPA whenever a NAAQS is established or revised.

Attached is a summary of PM_{2.5} ambient air monitoring data for 2004, 2005, and 2006. The Washoe County District Health Department / Air Quality Management Division (WCAQMD) operates one monitoring site, which is located in Hydrographic Area 87 as defined by the State of Nevada Division of Water Resources. These monitoring data were complete, quality assured, and reported in accordance with 40 CFR 50.8. Based on guidance documents from Robert J. Meyers (Acting Assistant Administrator for the EPA Office of Air and Radiation) dated June 8, 2007, the WCAQMD recommends that:

1. Hydrographic Area 87 of Washoe County be designated as an "attainment" area; and
2. The remaining Hydrographic Areas within Washoe County be designated as "unclassifiable" areas for the revised 24-hour PM_{2.5} NAAQS.

If you have any questions or comments, feel free to contact Mr. Duane Sikorski or me at (775) 784-7200.

Sincerely,

Andrew Goodrich, REM
Director

Attachment (Ranked 24-hour PM_{2.5} Data)
cc: Duane Sikorski, Air Quality Supervisor

P.O. BOX 11130 Reno, NV 89520-0027 • 401 Ryland Street, Ste. 331 • (775) 784-7200 • FAX (775) 784-7225

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ENVIRONMENTAL AGENCY

Attachment

Ranked 24-hour PM2.5 Data
2004-2006
AQS ID 32-031-0016

Year	Number of Valid Samples	Rank (98 th percentile)	Value ($\mu\text{g}/\text{m}^3$)	3-year Average ($\mu\text{g}/\text{m}^3$)
2004	115	113	29	32
2005	121	119	41	
2006	121	119	27	



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Mr. Leo Drozdoff, P.E., Administrator
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901 S. Stewart Street, Suite 4001
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Andrew Goodrich, REM
Director

Attachment (Ranked 24-hour PM_{2.5} Data)
cc: Duane Sikorski, Air Quality Supervisor

Attachment

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AQS ID 32-031-0016

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