



STATE OF NEVADA

Department of Conservation & Natural Resources

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

DIVISION OF ENVIRONMENTAL PROTECTION

Colleen Cripps, Ph.D., Administrator

May 3, 2011

Jared Blumenfeld
Regional Administrator
U.S. Environmental Protection Agency, Region 9
Mail Code ORA-1
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: Recommended Area Designations for the 2010 Primary National Ambient Air Quality Standards for Sulfur Dioxide (75 FR 35520, June 22, 2010)

Dear Mr. ~~Blumenfeld:~~ ^{Jared.}

On behalf of Governor Sandoval, as his appointed designee, pursuant to section 107(d)(1) of the 1990 Clean Air Act Amendments and the recently promulgated sulfur dioxide (SO₂) rule, I am submitting this letter requesting that the State of Nevada be designated for the 1-hour SO₂ NAAQS as follows:

- All hydrographic areas in the State of Nevada, Unclassifiable

The State of Nevada is divided into three jurisdictions for the purposes of air quality management: the Nevada Division of Environmental Protection (NDEP); the Department of Air Quality and Environmental Management (DAQEM) in Clark County; and the Air Quality Management Division (AQMD) of the Washoe County District Health Department (Washoe County). Each jurisdiction has evaluated their monitoring and modeling data regarding the SO₂ NAAQS and offers their area designation recommendations.

The NDEP recommends that all of the hydrographic areas in their jurisdiction be designated unclassifiable because sufficient monitoring data are not available to make an attainment or nonattainment designation. Additionally, for Prevention of Significant Deterioration baseline and increment tracking purposes, the term "State of Nevada" used in Nevada's area designation recommendation refers collectively to all the individual section 107(d) hydrographic areas in Nevada, as shown on the State of Nevada Division of Water Resources' map titled *Water Resources and Inter-Basin Flows* (September 1971) and subsequent revisions approved by EPA in Federal Register actions.

The Department of Air Quality and Environmental Management (DAQEM) staff in Clark County determined that Clark County does not have adequate data to recommend designation of attainment for the 1-hour SO₂ standard. For initial designations, the SO₂ rule requires States to use monitoring data for years 2008-2010. DAQEM has only one

active SO₂ monitor which began collecting data January 1, 2011. DAQEM historically collected SO₂ data at four other monitors in Clark County, but none have been operational since 2007. Therefore, DAQEM recommends that all hydrographic areas in the County be designated as unclassifiable, since Clark County has no SO₂ monitoring data for 2008-2010. A copy of DAQEM's recommendation letter is enclosed.

The Air Quality Management Division (AQMD) of the Washoe County District Health Department (Washoe County) has historically not monitored for SO₂ due to the fact that there are no sources of any significance with the AQMD's jurisdiction. Therefore, Washoe County recommends that all hydrographic areas in the County be designated as unclassifiable due to insufficient monitoring data. A copy of Washoe County's recommendation letter is enclosed.

If you should have any questions about Nevada's recommended area designations, please contact Greg Remer, Chief, Bureau of Air Quality Planning, at (775) 687-9359.

Sincerely,



Colleen Cripps, Ph.D.
Administrator

Enclosures

cc w/o enclosures:

Dale Erquiaga, Senior Advisor, Office of the Governor
Leo Drozdoff, Director, Nevada Department of Conservation and Natural Resources
Greg Remer, Chief, Bureau of Air Quality Planning, NDEP
Michael Elges, Deputy Administrator, NDEP
Kevin Dick, 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: 7010 3090 0002 0466 7764

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DAQEM

DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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

Lewis Wallenmeyer Director · Tina Gingras Assistant Director

March 29, 2011

Ms. Colleen Cripps, Administrator
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, NV 89701-5249

Re: Recommendation of Clark County Designation for Federal SO₂ Standard

Dear Ms. Cripps,

As required by the Clean Air Act (CAA) Section 107(d)(1) and the recently promulgated SO₂ rule (75 FR 35520, June 22, 2010), please consider and include the following information regarding Clark County in the Governor's initial Sulfur Dioxide (SO₂) designation recommendation.

The only active SO₂ monitor in Clark County is at our NCore site, which began collecting SO₂ data on January 1, 2011. Starting in 1998, there have been four other SO₂ monitors in Clark County, but none have been operational since 2007. Data from both NCore and historical sites show only trace SO₂ concentrations, indicating attainment of the SO₂ NAAQS.

However, in accordance with the CAA and applicable federal regulations (40 CFR 50, 53, and 58), Clark County Department of Air Quality and Environmental Management staff have determined that Clark County does not have adequate data for which to recommend designation of attainment for the 1-hour SO₂ standard. For initial designations to be finalized in June 2012, the SO₂ rule requires states to use monitoring data for years 2008-2010, as well as any recent and readily available refined SO₂ dispersion modeling. Clark County has no SO₂ monitoring values for 2008-2010, and no readily available modeling data.

Therefore, Clark County requests that the Governor recommend to EPA that Clark County be designated as an unclassifiable area for the revised SO₂ NAAQS. If you have any questions or need more information on any items related to this issue, please contact Dennis Ransel, Planning Manager, at (702) 455-1660. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "L. Wallenmeyer".

Lewis Wallenmeyer
Director

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WASHOE COUNTY HEALTH DISTRICT

AIR QUALITY MANAGEMENT DIVISION



Public Health
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Colleen / Adele
[Signature]

April 11, 2011

Dr. Colleen Cripps, PhD.
Administrator
Nevada Division of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City NV 89701-5249

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ENVIRONMENTAL PROTECTION

Re: Washoe County's Designation for the 2010 Revised Sulfur Dioxide National Ambient Air Quality Standard Effective August 23, 2010 (75 FR 35520; June 22, 2010)

Dear Dr. Cripps:

Pursuant to Section 107(d)(1) of the Clean Air Act, the governor of each state is to recommend area designations to the USEPA whenever a National Ambient Air Quality Standard (NAAQS) is revised. EPA is replacing the current 24-hour and annual standards with a new short-term standard based on the 3-year average of the 99th percentile of the yearly distribution of 1-hour daily maximum SO₂ concentrations. EPA is setting the level of this new standard at 75 ppb.

The Air Quality Management Division of the Washoe County Health District (AQMD) has historically not monitored for sulfur dioxide (SO₂) due to the fact that there are no sources of any significance within the AQMD's jurisdiction. Therefore, the AQMD recommends that all of Washoe County be designated as "Unclassifiable" due to insufficient monitoring data.

Should you have any questions regarding this matter, please feel free to call Duane Sikorski, Dan Inouye or me at (775) 784-7200.

Sincerely,

[Signature of Kevin Dick]

Kevin Dick
Director

cc: Jared Blumenfeld, Regional Administrator, USEPA Region IX
Greg Remer, Chief, NDEP Bureau of Air Quality Planning
Duane Sikorski, Supervisor, Washoe County Health District AQMD
Dan Inouye, Senior Air Quality Specialist

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