

**Clark County Portion of the
Nevada State Implementation Plan
to Meet the Ozone Infrastructure SIP
Requirements of Clean Air Act
Section 110(a)(2)**

August 2018

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ACRONYMS AND ABBREVIATIONS

AERR	Air Emissions Reporting Requirements
AQR	Clark County Air Quality Regulation
BCC	Clark County Board of County Commissioners
CAA	Clean Air Act
CFR	Code of Federal Regulations
DAQ	Clark County Department of Air Quality
EPA	U.S. Environmental Protection Agency
FR	<i>Federal Register</i>
I-SIP	Infrastructure State Implementation Plan
NAAQS	National Ambient Air Quality Standards
NDEP	Nevada Division of Environmental Protection
NESHAP	National Emission Standards for Hazardous Air Pollutants
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
PSD	Prevention of Significant Deterioration
QA	quality assurance
QC	quality control
SIP	State Implementation Plan
RTC	Regional Transportation Commission of Southern Nevada

INTRODUCTION AND BACKGROUND

This plan addresses Clark County's portion of the state of Nevada's Infrastructure State Implementation Plan (I-SIP) requirements, and its ability and authority to implement, maintain, and enforce the 2015 National Ambient Air Quality Standard (NAAQS) for ozone.

Under Sections 110(a)(1) and 110(a)(2) of the federal Clean Air Act (CAA), each state is required to submit an I-SIP that demonstrates its ability and authority to implement, maintain, and enforce each NAAQS. Section 110(a)(1) requires each state make this submission within three years after promulgation of any new or revised NAAQS. Section 110(a)(2) lists the required I-SIP elements, which include enforceable emission limitations air quality modeling; enforcement programs; ambient air monitoring programs; and confirmation of adequate personnel, resources, and legal authorities.

The following elements are addressed in this I-SIP:

- Enforceable Emission Limitations and Other Control Measures (110(a)(2)(A))
- Air Quality Monitoring, Compilation, Data Analysis, and Reporting (110(a)(2)(B))
- Enforcement and Stationary Source Permitting (110(a)(2)(C))
- Interstate Transport (110(a)(2)(D))
- Resources, Conflict of Interest, and Emergency Backstop (110(a)(2)(E))
- Stationary Source Emissions Monitoring and Reporting (110(a)(2)(F))
- Emergency Powers and Contingency Plans (110(a)(2)(G))
- Revision for Revised Air Quality Standards or New Attainment Methods (110(a)(2)(H))
- SIP Revisions for New Nonattainment Areas (110(a)(2)(I))
- Consultation and Public Notification (110(a)(2)(J))
- Air Quality Modeling and Reporting (110(a)(2)(K))
- Major Stationary Source Permitting Fees (110(a)(2)(L))
- Consultation with Local Entities (110(a)(2)(M))

In accordance with U.S. Environmental Protection Agency (EPA) guidance,¹ two elements identified in Section 110(a)(2) are not governed by the three-year submission deadline of Section 110(a)(1). The elements pertain to Part D in Title I of the CAA, which addresses plan requirements for nonattainment areas; therefore, EPA considers the following Section 110(a)(2) elements to be outside the scope of I-SIP actions:

- (1) Section 110(a)(2)(C), to the extent it refers to permit programs (known as "nonattainment new source review") under part D; and
- (2) Section 110(a)(2)(I) in its entirety.

¹ EPA memorandum, Stephen D. Page to Regional Air Directors, September 13, 2013. "Guidance on Infrastructure State Implementation Plan (SIP) Elements Under Clean Air Act Sections 110(a)(1) and 110(a)(2)."

CAA SECTION 110(A)(2)(A)–(M) REQUIREMENTS FOR THE CLARK COUNTY PORTION OF THE NEVADA INFRASTRUCTURE SIP FOR THE 2015 OZONE NAAQS

<p>Element (A)</p>	<p><u>Emission limits and other control measures:</u> Requires SIPs to include enforceable emission limits and other control measures, means or techniques, and schedules for compliance.</p>
<p>The Clark County Board of County Commissioners (BCC), in accordance with Chapter 445B of the Nevada Revised Statutes (NRS), has adopted the Clark County Air Quality Regulations (AQRs) and delegated enforcement authority to the Department of Air Quality (DAQ). Emission sources within Clark County are required to comply with all existing rules and regulations through federally enforceable state implementation plan (SIP) regulations.</p> <p>Clark County has a SIP-approved prevention of significant deterioration (PSD) program, and most of the AQRs are SIP-approved. Several AQR updates have been adopted by the BCC and submitted to EPA for incorporation into the SIP. Appendix A contains a complete index of all AQRs (SIP-approved and local only).</p> <p>The following AQRs have been approved by the BCC and have been incorporated into the Nevada SIP. They provide measures that limit the emission of ozone precursors and establish the framework for implementing those measures:</p> <ul style="list-style-type: none"> • Section 4 – Control Officer (46 FR 26386) • Section 10 – Compliance Schedules (46 FR 43141) • Section 12.0 – Applicability, General Requirements, Transition Procedures (79 FR 62351) • Section 12.1 – Permit Requirements for Minor Sources (79 FR 62351) • Section 12.2 – Permit Requirements for Major Sources in Attainment Areas (PSD) (79 FR 62351) • Section 12.3 – Permit Requirements for Major Sources in Nonattainment Areas (79 FR 62351) • Section 12.4 – Authority to Construct Application and Permit Requirements for Part 70 Sources (79 FR 62351) • Section 25 – Affirmative Defense for Excess Emissions Due to Malfunctions, etc. (46 FR 43141) • Section 33 – Chlorine in Chemical Processes (51 FR 29923) • Section 50 – Storage of Petroleum Products (46 FR 21758) • Section 51 – Petroleum Product Loading into Tank Trucks and Trailers (46 FR 21758) • Section 70 – Emergency Procedures (46 FR 43141). 	

The following AQRs have been approved by the BCC, but **have not been incorporated into the Nevada SIP**. They are local rules that further support the requirements of this element:

- Section 7 – Hearing Board and Hearing Officer
- Section 9 – Civil Penalties
- Section 12.5 – Part 70 Permit Requirements
- Section 12.9 – Annual Emissions Inventory Requirement
- Section 12.10 – Continuous Monitoring Requirements for Stationary Sources
- Section 12.11 – General Permits for Minor Stationary Sources
- Section 12.12 – Transfer of Permit
- Section 13 – National Emission Standards for Hazardous Air Pollutants²
- Section 14 – New Source Performance Standards.³

Clark County will continue to implement the permitting and enforcement programs and enforce control measures with respect to the requirements in the CAA.

Element (B)	<u>Ambient air quality monitoring/data system:</u> Requires SIPs to provide for establishment and operation of ambient air quality monitors, collection and analysis of ambient air quality data, and to make these data available to EPA upon request.
<p>Clark County operates an ambient air quality monitoring network in accordance with 40 CFR 58. The quality control (QC) flow rate verifications and quality assurance (QA) flow rate audits meet EPA guidelines for all monitors in the network. An annual monitoring network plan is completed and submitted to EPA as required in 40 CFR 58.10. Appendix B contains a copy of EPA’s approval of DAQ’s 2017 annual monitoring network plan. Monitoring data is submitted to EPA via the Air Quality System; monitoring data is also available on DAQ’s website in near-real time.</p>	

² On September 25, 2015, DAQ was granted partial delegation of the federal National Emission Standards for Hazardous Air Pollutants program in 40 CFR 61 and 63 (86 FR 21927), with an effective date of delegation of July 1, 2014.

³ On September 25, 2015, DAQ was granted partial delegation of the federal New Source Performance Standards program in 40 CFR 60 (86 FR 21927), with an effective date of delegation of July 1, 2014.

<p>Element (C)</p>	<p><u>Program for enforcement of control measures:</u> Requires SIPs to include a program providing for enforcement of all SIP measures and the regulation of construction of new and modified stationary sources as necessary to assure that the NAAQS are achieved, including a permit program as required in Parts C and D.</p>
<p>AQR Section 4 – Control Officer – authorizes the Control Officer to enforce all AQRs, including the following SIP-approved sections (46 FR 26386):</p> <ul style="list-style-type: none"> • Section 5 – Interference with Control Officer (46 FR 43141) • Section 6 – Injunctive Relief (46 FR 43141) • Section 10 – Compliance Schedules (46 FR 43141) • Section 12.0 – Applicability, General Requirements, Transition Procedures (79 FR 62351) • Section 12.1 – Permit Requirements for Minor Sources (79 FR 62351) • Section 12.2 – Permit Requirements for Major Sources in Attainment Areas (PSD) (79 FR 62351) • Section 12.3 – Permit Requirements for Major Sources in Nonattainment Areas (79 FR 62351) • Section 12.4 – Authority to Construct Application and Permit Requirements for Part 70 Sources (79 FR 62351) • Section 12.11 – General Permits for Minor Stationary Sources • Section 25 – Affirmative Defense For Excess Emissions Due to Malfunctions, Startup, and Shutdown (46 FR 43141) • Section 26 – Emission of Visible Air Contaminants (82 FR 27622) • Section 27 – Particulate Matter from Process Weight Rate (47 FR 26386) • Section 28 – Fuel Burning Equipment (46 FR 43141) • Section 50 – Storage of Petroleum Products (46 FR 21758) • Section 51 – Petroleum Product Loading into Tank Trucks and Trailers (46 FR 21758) • Section 70 – Emergency Procedures (46 FR 43141). <p>The following AQRs are local rules that have been approved by the BCC but have not been incorporated into the Nevada SIP, and further support the requirements of this element:</p> <ul style="list-style-type: none"> • Section 9 – Civil Penalties • Section 12.5 – Part 70 Operating Permit Requirements • Section 12.12 – Transfer of Permit • Section 13 – National Emission Standards for Hazardous Air Pollutants • Section 14 – New Source Performance Standards. 	

<p>Element (D)(i)(I)</p>	<p><u>Interstate transport provisions – significant contribution and interference with maintenance:</u> Requires SIPs to contain adequate provisions prohibiting emissions generated within the state from contributing significantly to nonattainment in, or interfering with maintenance by, any other state with respect to the NAAQS.</p>
<p>Emissions activities from within Nevada do not contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to the 2015 ozone NAAQS. Based on recently released EPA contribution modeling, Nevada’s expected contribution of 2023 anthropogenic nitrogen oxide (NO_x) and volatile organic compound (VOC) emissions is not greater than one percent of the 2015 ozone NAAQS to any EPA-identified nonattainment or maintenance receptor in any other state. Nevada commits to continue to review new air quality information as it becomes available to ensure that this negative declaration is still supported by such information. The analysis is contained in Appendix C.</p>	
<p>Element (D)(i)(II)</p>	<p><u>Interstate transport provisions – PSD and visibility:</u> Requires SIPs to contain adequate provisions prohibiting emissions generated within the state from contributing significantly to nonattainment, or interfering with PSD measures or measures to protect visibility in any other state.</p>
<p>Clark County has SIP-approved New Source Review (NSR) and PSD programs. New major sources and major modifications of existing sources are subject to NSR/PSD permitting rules. The visibility requirements of Subsection (D)(i)(II) are addressed by the Nevada Regional Haze State Implementation Plan.</p>	
<p>Element (D)(ii)</p>	<p><u>Interstate and international transport provisions:</u> Requires SIPs to contain adequate provisions ensuring compliance with the applicable requirements of CAA Sections 115 or 126 that involve ozone emissions (relating to interstate and international pollution abatement).</p>
<p><u>CAA Section 115</u> EPA has not identified any sources of ozone or ozone precursors in Nevada that contribute to pollution in foreign countries. Therefore, Clark County is not subject to Section 115 of the CAA.</p> <p><u>CAA Section 126</u> Clark County’s SIP-approved PSD/NSR permitting rules contain adequate provisions to be in compliance with Section 126(a) of the CAA. See also elements (J) and (M). The requirements of Sections 126(b) and (c) do not apply because there are no petitions pending against Nevada.</p>	

<p>Element (E)</p>	<p><u>Adequate authority and resources:</u> Requires SIPs to provide necessary assurances for adequate personnel, funding, and authority under state law to carry out its SIP, to contain requirements addressing potential conflicts of interest, and to provide necessary assurances that the state retains responsibility for ensuring adequate implementation of the SIP where the state relies on a local or regional government for implementation of any SIP provision.</p>
<p>NRS 445B.500 authorizes Clark County to implement and administer air quality management programs within the geographic boundaries of Clark County. These programs are managed through DAQ, with a current air quality budget of approximately \$20 million and 86 full-time equivalent staff positions. Primary sources of funding are:</p> <ul style="list-style-type: none"> • Permits and technical services fees collected from regulated emission sources • Federal grants • Fund distributions from the Nevada Air Pollution Control Account, per NRS 445B.830 • RTC transportation tax revenue, as established by NRS 377A.090 • Federal Congestion Mitigation and Air Quality Program (CMAQ) funds. <p>NRS 445B.520 gives the State Environmental Commission⁴ the authority to supersede the county program.</p> <p>Clark County Code Chapter 2.42, “Ethical Standards,” specifies conflict of interest requirements for Clark County public officers and officials, including BCC members and the Control Officer. These requirements specifically prohibit all local public officials from participating in governmental decisions in which they have a financial interest.</p> <p>The following provisions of state law address the requirements of CAA Sections 110(a)(2)(E)(ii) and 128:</p> <ul style="list-style-type: none"> • NRS 281A.150 (“Public employee’ defined”) • NRS 281A.160 (“Public officer’ defined”) • NRS 281A.400 (“General requirements; exceptions”) • NRS 281A.410 (“Limitations on representing or counseling private persons before public agencies; disclosure required by certain public officers”) • NRS 281A.420 (“Requirements regarding disclosure of conflicts of interest and abstention from voting because of certain types of conflicts; effect of abstention on quorum and voting requirements; exceptions”). 	

⁴ State Environmental Commission is defined in NRS 445B.200.

Element (F)	<u>Stationary source monitoring system:</u> Requires SIPs to establish a system to monitor emissions from stationary sources, to submit periodic emissions reports, to correlate the emissions reports with the corresponding SIP emission limits and standards, and to make emissions reports available to the public.
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The following SIP-approved AQRs provide the authority for the installation and maintenance of sampling and testing facilities to measure emissions of air contaminants and collect data:

- Section 12.1 – Permit Requirements for Minor Sources (79 FR 62351)
- Section 12.2 – Permit Requirements for Major Sources in Attainment Areas (PSD) (79 FR 62351)
- Section 12.3 – Permit Requirements for Major Sources in Nonattainment Areas (79 FR 62351)
- Section 12.4 – Authority to Construct Application and Permit Requirements for Part 70 Sources (79 FR 62351)
- Section 25 – Affirmative Defense for Excess Emissions Due to Malfunctions (46 FR 43141).

The following AQRs are local rules that have been approved by the BCC but have not been incorporated into the Nevada SIP, and further support the requirements of this element:

- Section 12.5 – Part 70 Operating Permit Requirements
- Section 12.9 – Annual Emissions Inventory Requirement
- Section 12.10 – Continuous Monitoring Requirements for Stationary Sources
- Section 12.11 – General Permits for Minor Stationary Sources

Emissions data is submitted according to the Air Emissions Reporting Requirements (AERR). Emissions data is available to the public except when the data is deemed confidential in accordance with AQR Section 12.6 and NRS 445B.570.

Element (G)	<u>Emergency episodes:</u> Requires SIPs to provide for authority to address activities causing imminent and substantial endangerment to public health and to provide for adequate contingency plans to implement such authority.
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In accordance with NRS 445B.500(1)(d), Clark County has the authority to provide rules and regulations for alert, warning, and emergency standards and abatement procedures relative to air pollution episodes or emergencies constituting, or likely to constitute, an imminent and substantial danger to people’s health pursuant to NRS 445B.560.

AQR Section 70, “Emergency Procedures,” authorizes the Control Officer to declare an episode, alert, or emergency if general conditions or the operation of sources of air contaminants are causing or may cause imminent danger to human health, and sets forth the procedures to be implemented during air pollution episodes (46 FR 43141).

AQR Section 6, “Injunctive Relief,” allows Clark County to apply to a court of competent jurisdiction to enforce compliance with, or restrain violations of, any provision of the AQRs (46 FR 43141).

Element (H)	<u>Future SIP revisions:</u> Requires SIPs to provide for SIP revisions in response to changes in the NAAQS or availability of improved methods for attaining the NAAQS, and in response to an EPA finding that the SIP is substantially inadequate.
<p>Clark County must provide a method for revision of SIPs when air quality standards are revised, new attainment methods become available, or EPA informs states that current SIPs are inadequate for attaining standards or complying with additional CAA requirements.</p> <p>AQR Section 2, “Procedures for Adoption and Revision of Regulations and for Inclusion of those Regulations in the State Implementation Plan,” sets forth the general procedural requirements for the adoption of regulations and other materials to be incorporated into the SIP (46 FR 43141). These procedures apply to submission of:</p> <ul style="list-style-type: none"> (a) Any revision to the SIP described by 40 CFR 51.104(a); (b) Any individual compliance schedule, under 40 CFR 51.260; (c) Any other SIP revision submitted to NDEP pursuant to 40 CFR 51.104(d). 	

Element (I)	<u>SIP revisions for new nonattainment areas:</u> Requires SIP revisions to meet the applicable Part D requirements relating to nonattainment areas.
<p>EPA considers this element to be outside the scope of I-SIP actions because of the separate statutory schedules for area designations and submission of attainment plans provided elsewhere in the CAA. Therefore, EPA does not expect I-SIP submissions to address this element (Stephen D. Page, “Guidance on I-SIP Elements” memo).</p>	

<p>Element (J) CAA § 121</p>	<p>Consultation with government officials, public notification, PSD and visibility protection: Requires SIPs to provide a process for consultation with local governments and Federal Land Managers carrying out NAAQS implementation requirements, pursuant to CAA Section 121 relating to consultation.</p>
<p>Clark County will continue including local governments and managers of affected federal lands in its consultation process as part of carrying out CAA requirements. AQR Section 2, “Procedures for Adoption and Revision of Regulations and for Inclusion of those Regulations in the State Implementation Plan,” outlines the procedures for adoption and revision of regulations (46 FR 43141). These procedures include provisions for notice to the public and governmental entities, as well as public hearings, before seeking to amend the SIP applicable to Clark County.</p>	
<p>Element (J) CAA § 127</p>	<p>Requires SIPs to contain measures to notify the public if NAAQS are exceeded in an area and to enhance public awareness of measures that can be taken to prevent exceedances.</p>
<p>AQR Section 70, “Emergency Procedures,” authorizes the Control Officer to declare an episode, alert, or emergency if general conditions or the operation of sources of air contaminants are causing or may cause imminent danger to human health (46 FR 43141). Additionally, near-real time ambient air monitoring data is posted on DAQ’s website.</p>	
<p>Element (J)</p>	<p>Requires SIPs to meet applicable requirements of Part C related to prevention of significant deterioration and visibility protection.</p>
<p>Part C of Title I of the CAA requires states to provide measures relating to PSD and visibility protection. The following SIP-approved AQRs contain provisions for PSD areas and visibility protection, as well as for public participation:</p> <ul style="list-style-type: none"> • Section 12.1 – Permit Requirements for Minor Sources (79 FR 62351) • Section 12.2 – Permit Requirements for Major Sources in Attainment Areas (79 FR 62351) • Section 12.3 – Permit Requirements for Major Sources in Nonattainment Areas (79 FR 62351) • Section 12.4 – Authority to Construct Application and Permit Requirements for Part 70 Sources (79 FR 62351) • Section 25 – Affirmative Defense for Excess Emissions Due to Malfunctions (46 FR 43141). 	

Element (K)	<u>Air quality modeling/data:</u> Requires SIPs to provide for the performance of air quality modeling for predicting effects on air quality of emissions of any NAAQS pollutant and the submission of such data to EPA upon request.
<p>Clark County’s air quality modeling work complies with EPA’s final guidance on the use of models in attainment demonstrations for the NAAQS. Clark County uses the latest methods and techniques, and documents modeling information and computer model performance evaluations.</p> <p>Clark County will continue to use air quality models in accordance with approved EPA and DAQ modeling guidance and protocols, and continue to submit data and modeling results to EPA as requested.</p> <p>The following SIP-approved AQRs contain provisions that require air quality modeling:</p> <ul style="list-style-type: none"> • Section 12.2 – Permit Requirements for Major Sources in Attainment Areas (79 FR 62351) • Section 12.3 – Permit Requirements for Major Sources in Nonattainment Areas (79 FR 62351) • Section 12.4 – Authority to Construct Application and Permit Requirements for Part 70 Sources (79 FR 62351). 	

Element (L)	<u>Permitting fees:</u> Requires SIPs to require each major stationary source to pay permitting fees to cover the cost of reviewing, acting upon, implementing, and enforcing a permit until such fee requirement is superseded by EPA approval of a fee program under Title V of the CAA.
<p>Permit and technical service fees are authorized under AQR Section 18, “Permit and Technical Service Fees” (47 FR 26386). Section 18 includes fees for sources subject to Title V (Part 70) permit requirements.</p> <p>Clark County will continue to implement and update major stationary source permit fee regulations to comply with the requirements of CAA Sections 501-507.</p>	

<p>Element (M)</p>	<p><u>Consultation/participation by affected local entities:</u> Requires SIPs to provide for consultation and participation in SIP development by local political subdivisions affected by the SIP.</p>
<p>Clark County allows for consultation and participation in SIP development by means of involvement in the following stakeholder groups, which include members of the regulated community, environmental groups, other Clark County communities, state agencies, and EPA.</p> <p>Nevada Air Agencies: A collaborative group consisting of members from the Nevada Division of Environmental Protection, Clark County Department of Air Quality, Washoe County Air Quality Management District, and EPA whose goal is to coordinate review and discuss air quality policies and their impact on air quality jurisdictions in Nevada.</p> <p>The Southern Nevada Clean Cities Coalition/Southern Nevada Fleet Association: A coalition consisting of public and private fleet operators in southern Nevada whose goal is to improve vehicle efficiency and reduce operating costs by advancing clean technologies, networking between agencies, and providing opportunities for education and training.</p> <p>The Metropolitan Planning Subcommittee: A planning committee consisting of members from the Regional Transportation Commission of Southern Nevada (RTC), Clark County Department of Aviation, City of Las Vegas, City of Henderson, City of North Las Vegas, City of Boulder City, City of Mesquite, Nevada Department of Transportation, Clark County School District, taxicab or private motor carrier industry, U.S. Bureau of Land Management, Southern Nevada Water Authority, and DAQ whose goal is to assist the RTC’s Executive Advisory Committee in preparing recommendations on transportation planning and programming issues that require investigation and analysis by RTC.</p> <p>The Southern Nevada Regional Planning Coalition: A planning coalition consisting of members from Clark County, the City of Las Vegas, the City of Henderson, the City of North Las Vegas, the City of Boulder City, and the Clark County School District Board of Trustees whose goal is to provide a forum to review and discuss air quality policies and implementation plans and their impact on southern Nevada.</p> <p>The Advisory Committee on Control of Emissions from Motor Vehicles: An advisory committee consisting of members from the Nevada Department of Agriculture, Nevada Department of Motor Vehicles, Nevada Department of Transportation, Nevada Division of Environmental Protection, Washoe County Air Quality Management District, DAQ, and EPA whose goal is to provide programmatic oversight of the program for control of emissions from motor vehicles.</p>	

Western States Air Resources Council/Western Regional Air Partnership: A membership organization consisting of representatives from states, tribes, federal land managers, local air agencies, and EPA whose goal is to support Western regional air quality analyses and the planning needs of its members.

APPENDIX A

SIP-Approved and Local-Only Clark County Air Quality Regulations

Clark County Air Quality Regulations

Section	Description	SIP-Approved/ Local Rule	EPA Approval ¹
Section 0	Definitions	SIP-approved	10/17/14 79 FR 62351
Section 1	Definitions	SIP-approved	10/17/14 79 FR 62351
Section 2	Procedures for Adoption and Revision of Regulations and for Inclusion of those Regulations in the State Implementation Plan	SIP-approved	8/27/81 46 FR 43141
Section 4	Control Officer	SIP-approved	6/18/82 46 FR 26386
Section 5	Interference with Control Officer	SIP-approved	8/27/81 46 FR 43141
Section 6	Injunctive Relief	SIP-approved	8/27/81 46 FR 43141
Section 7	Hearing Board and Hearing Officer	<i>Local Rule</i>	
Section 8	Persons Liable for Penalties-Punishment Defense	SIP-approved	8/27/81 46 FR 43141
Section 9	Civil Penalties	<i>Local Rule</i>	
Section 10	Compliance Schedules	SIP-approved	8/27/81 46 FR 43141
Section 12.0	Applicability, General Requirements and Transition Procedures	SIP-approved	10/17/14 79 FR 62351
Section 12.1	Permit Requirements For Minor Sources	SIP-approved	10/17/14 79 FR 62351
Section 12.2	Permit Requirements For Major Sources In Attainment Areas (Prevention Of Significant Deterioration)	SIP-approved	10/17/14 79 FR 62351
Section 12.3	Permit Requirements For Major Sources In Nonattainment Areas	SIP-approved	10/17/14 79 FR 62351
Section 12.4	Authority to Construct Application And Permit Requirements For Part 70 Sources	SIP-approved	10/17/14 79 FR 62351
Section 12.5	Part 70 Operating Permit Requirements	<i>Local Rule- Under EPA review</i>	
Section 12.6	Confidentiality	<i>Local Rule</i>	
Section 12.7	Emission Reduction Credits	SIP-approved	10/17/14 79 FR 62351

¹ Government Publishing Office. 40 CFR 52.1470. Identification of plan: Table 3- EPA-Approved Clark County Regulations.

Retrieved June 6, 2018, from: https://www.ecfr.gov/cgi-bin/text-idx?SID=053bd3d64f4f377decd95bb12a2ff5a1&mc=true&node=se40.4.52_11470&rgn=div8

Section	Description	SIP-Approved/ Local Rule	EPA Approval ¹
Section 12.9	Annual Emissions Inventory Requirement	<i>Local Rule</i>	
Section 12.10	Continuous Monitoring Requirements for Stationary Sources	<i>Local Rule</i>	
Section 12.11	General Permits for Minor Stationary Sources	<i>Local Rule- Withdrawn from SIP consideration</i>	
Section 12.12	Transfer of Permit	<i>Local Rule</i>	
Section 12.13	Posting of Permit	<i>Local Rule</i>	
Section 13	National Emission Standards for Hazardous Air Pollutants	<i>Local Rule</i>	
Section 14	New Source Performance Standards	<i>Local Rule</i>	
Section 18	Permit and Technical Service Fees	SIP-approved	6/18/82 47 FR 26386
Section 21	Acid Rain Permits	<i>Local Rule</i>	
Section 22	Acid Rain Continuous Emission Monitoring	<i>Local Rule</i>	
Section 25	Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown	SIP-approved	8/27/81 46 FR 43141
Section 26	Emission of Visible Air Contaminants	SIP-approved	6/16/2017 82 FR 27622
Section 27	Particulate Matter from Process Weight Rate	SIP-approved	6/18/82 47 FR 26386
Section 28	Fuel Burning Equipment	SIP-approved	8/27/81 46 FR 43141
Section 32	Reduction of Animal Matter	SIP-approved	8/27/81 46 FR 43141
Section 33	Chlorine in Chemical Processes	SIP-approved	8/21/86 51 FR 29923
Section 40	Prohibitions of Nuisance Conditions	<i>Local Rule</i>	
Section 41	Fugitive Dust	SIP-approved	10/6/14 79 FR 60080
Section 42	Open Burning	SIP-approved	8/27/81 46 FR 43141
Section 43	Odors in the Ambient Air	<i>Local Rule</i>	
Section 44	Prohibitions on Planting, Selling, or Offering to Sell Fruitless Mulberry and European Olive Trees	<i>Local Rule</i>	
Section 45	Idling of Diesel Powered Motor Vehicles	<i>Local Rule</i>	
Section 50	Storage of Petroleum Products	SIP-approved	4/14/81 46 FR 21758
Section 51	Petroleum Product Loading into Tank Trucks and Trailers	SIP-approved	4/14/81 46 FR 21758
Section 53	Oxygenated Gasoline Program	SIP-approved	9/21/04 69 FR 56351

Section	Description	SIP-Approved/ Local Rule	EPA Approval¹
Section 70	Emergency Procedures	SIP-approved	8/27/81 46 FR 43141
Section 80	Circumvention	SIP-approved	8/27/81 46 FR 43141
Section 81	Provisions of Regulations Severable	SIP-approved	8/27/81 46 FR 43141
Section 90	Fugitive Dust from Open Areas and Vacant Lots	SIP-approved	10/6/14 79 FR 60080
Section 91	Fugitive Dust from Unpaved Roads, Unpaved Alleys, and Unpaved Easement Roads	SIP-approved	10/6/14 79 FR 60080
Section 92	Fugitive Dust from Unpaved Parking Lots and Storage Areas	SIP-approved	10/6/14 79 FR 60080
Section 93	Fugitive Dust from Paved Roads and Street Sweeping Equipment	SIP-approved	10/6/14 79 FR 60080
Section 94	Permitting and Dust Control for Construction Activities	SIP-approved	10/30/06 71 FR 63250

APPENDIX B

**Letter from Gwen Yoshimura (EPA Region 9) to
Phillip Wiker (DAQ) regarding DAQ's 2017
Annual Monitoring Network Plan,
dated October 30, 2017**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 30 2017

RECEIVED CC DAQ
2017 NOV 6 AM 11:37 MJK

Mr. Phillip Wiker
Manager, Air Quality Monitoring
Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, Nevada 89118

Dear Mr. Wiker:

Thank you for your submission of the Clark County Department of Air Quality's (DAQ's) *Annual Monitoring Network Plan Report* on June 9, 2017. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve the following system modifications: SLAMS NO₂ monitoring at Jerome Mack (AQS ID: 32-003-0540), SLAMS PM₁₀ monitoring at Walter Johnson (AQS ID: 32-003-0071), and new SLAMS monitoring sites for O₃, PM_{2.5}, and PM₁₀ at Liberty High School (AQS ID: to be determined) and Mountain's Edge Park (AQS ID: to be determined). More information about these approvals is included in Enclosure D.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

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If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Anna Mebust at (415) 972-3265.

Sincerely,



Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Additional Items Requiring Attention
- C. Annual Monitoring Network Plan Checklist
- D. EPA Approval of New SLAMS Monitors at Jerome Mack, Walter Johnson, Liberty High School, and Mountain's Edge Park

cc (via email): Marci Henson, DAQ
Yousaf Hameed, DAQ
Piotr Nowinski, DAQ
Stephen Deyo, DAQ

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Identification of sites suitable for comparison to the PM _{2.5} annual NAAQS	21	Insufficient information to judge in one instance
Distance from drip line of closest tree(s)	80	Not meeting requirement in three instances

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (C. Annual Monitoring Network Plan Checklist).

B. Additional Items Requiring Attention

- [Item 3] DAQ provided a statement that all SLAMS monitors meet the requirements of appendices A, B, C, D and E, where applicable; however, the statement should address all monitors, not just SLAMS monitors. Please update this statement in next year's plan to include SPMs. If there are deviations from these requirements for some monitors, and the plan already discusses all deviations, the addition of the phrase "except where otherwise noted" is acceptable.
- [Item 7] The site table entry for "Will there be changes within the next 18 months" for Apex and Mesquite monitors is "N." DAQ discusses proposed/approved relocations for both sites elsewhere in the plan, and EPA has now approved relocations for both monitors. Please update this table entry to "Y" for both sites in next year's plan.
- [Item 10] Please note that no statement was provided for the PM_{2.5} SPM operating at Paul Meyer. Since this monitor did not begin operation until 2017, DAQ is meeting the requirement for this plan, however, please address this checklist item for the Paul Meyer PM_{2.5} SPM in next year's plan. Note that if the comment for checklist item #3 is addressed, that may meet the requirement for this checklist item as well.
- [Item 17] While DAQ is meeting the requirement, please note that the number of active sites in Table 4 should be 6, not 7. The PM_{2.5} SPM at Paul Meyer is not counted towards meeting minimum monitoring requirements unless/until it has been in operation for at least 24 months and is comparable to the NAAQS. Please update this in next year's plan.
- [Item 28] PM_{2.5} flow rate audits were outside of the 5-7 month recommended range for Thermo 5014i monitors at all sites operating in 2016. Time between audits ranged from 8 months 9 days to 8 months 11 days.
- [Item 33] PM₁₀ flow rate audits were outside of the 5-7 month recommended range for all monitors except at Jerome Mack. Time between audits ranged from 7 months 17 days to 8 months 13 days.
- [Item 45] Joe Neal is currently the highest O₃ concentration site in the MSA. However, information provided in DAQ's 2015 network assessment indicated that the current monitoring network may not be capturing the maximum expected O₃ concentration expected within the MSA. Please continue to work with EPA on an evaluation of the maximum O₃ concentration location.
- [Item 47] While DAQ is meeting the requirement, Table 6 lists the number of required area-wide monitors for the MSA as 1, and the text below the table indicates that Sunrise Acres is an RA40 required site. As described in 40 CFR 58 App D 4.3.3(a) and 4.3.4(a), there is a requirement for an area-wide monitor in an area of expected highest concentration in CBSAs with population greater than 1,000,000, and the RA40 required sites are in addition to the other minimum monitoring requirements. The number of required sites for the MSA should therefore be 2. Please update this in next year's plan.

- [Item 63] The GPS coordinates provided for several sites are slightly different than GPS coordinates in AQS, and appear to be slightly off from the monitoring station location when viewed in Google Maps satellite view.

Please review and confirm GPS coordinates in the plan and in AQS for consistency and accuracy in next year's plan.

- [Item 68] While the Indian Springs O₃ monitor does not have a network affiliation, it is missing the network affiliation row in the site table. Please include this in future plans.
- [Item 73] While the site is meeting the requirement, please check the distance to nearest road for the Jean site and if needed, update this in next year's plan.

Also, please clarify which road the distances and traffic counts were provided for at Indian Springs and Mesquite in next year's plan.

- [Item 84] Residence time for CO at Rancho & Teddy is listed as "2.0 (est)." As this monitor was not yet operating in 2016, DAQ is meeting the requirement. However, please confirm the residence time for this monitor in next year's plan.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Yes, Cover Letter	Yes	Plan was submitted June 9 th , 2017.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Yes, Cover Letter	Yes	No comments were received.
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Yes, p. 7	Yes	DAQ provided a statement that all SLAMS monitors meet the requirements of appendices A, B, C, D and E, where applicable; however, the statement should address all monitors, not just SLAMS monitors. Please update this statement in next year's plan to include SPMs. If there are deviations from these requirements for some monitors, and the plan already discusses all deviations, the addition of the phrase "except where otherwise noted" is acceptable.

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, or Incomplete.

³ Assuming the information is correct.

⁴ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Yes, p. 65-81		<p>EPA is approving the following system modifications at this time:</p> <ul style="list-style-type: none"> • Initiation of SLAMS NO₂ monitoring at Jerome Mack • Initiation of SLAMS PM₁₀ monitoring at Walter Johnson • Initiation of SLAMS O₃, PM_{2.5}, and PM₁₀ monitoring at a new site, Liberty High School • Initiation of SLAMS O₃, PM_{2.5}, and PM₁₀ monitoring at a new site, Mountain's Edge Park <p>Information about these approvals can be found in Enclosure D.</p> <p>EPA also approved several other system modifications included in the plan through separate requests from DAQ; these were completed between the posting of this plan for public comment and this approval. See checklist item #6 for additional information on these approvals.</p>
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	NA	NA	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Yes, Appendix A	Yes	The plan includes documentation of EPA approvals of the shutdown of Pb monitoring at Jerome Mack and relocation of the monitor in Mesquite in Appendix A. EPA additionally approved relocation of the Boulder City monitor, relocation of the Apex monitor, shutdown of monitoring at JD Smith, and approval of new SLAMS monitoring at Walnut/Cecile via one letter dated April 5, 2017, and two letters dated August 7, 2017. These approvals were issued after the start of the public comment period for this plan and are therefore not included; please include copies of these letters in next year's plan.
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes, p. 65-81, site tables	Yes	The site table entry for "Will there be changes within the next 18 months" for Apex and Mesquite monitors is "N." DAQ discusses proposed/approved relocations for both sites elsewhere in the plan, and EPA has now approved relocations for both monitors. Please update this table entry to "Y" for both sites in next year's plan.
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Yes, p. 7	Yes	
9.	Annual data certification submitted	58.15	Yes, p. 8	Yes	
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁵	58.11 (a)(2)	Yes, p. 67	Yes	Please note that no statement was provided for the PM _{2.5} SPM operating at Paul Meyer. Since this monitor did not begin operation until 2017, DAQ is meeting the requirement for this plan, however, please address this checklist item for the Paul Meyer PM _{2.5} SPM in next year's plan. Note that if the comment for checklist item #3 is addressed, that may meet the requirement for this checklist item as well. Spring Mountain Youth Camp O ₃ monitor is non-FRM/FEM/ARM.

⁵ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁶	58.20 (c)	Yes, p. 67	Yes	Spring Mountain Youth Camp O ₃ monitor is non-FRM/FEM/ARM. DAQ has not operated any other SPM monitors for over 24 months.
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(c)	NA	NA	
GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)					
13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Yes, site tables	Yes	
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Yes, site tables	Yes	
PM_{2.5}-SPECIFIC MONITORING REQUIREMENTS					
15.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Yes, p. 82	Yes	
16.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS-comparable</u> monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	NA	NA	No monitors identified as not eligible to be compared to the NAAQS due to poor comparability to FRM(s).

⁶ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
17.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Yes, p. 10	Yes	While DAQ is meeting the requirement, please note that the number of active sites in Table 4 should be 6, not 7. The PM _{2.5} SPM at Paul Meyer is not counted towards meeting minimum monitoring requirements unless/until it has been in operation for at least 24 months and is comparable to the NAAQS. Please update this in next year's plan.
18.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App. D 4.7.2	Yes, p. 10	Yes	
19.	FRM/FEM/ARM PM _{2.5} QA collocation	App. A 3.2.3	Yes, p. 14	Yes	The PM _{2.5} SPM at Paul Meyer was not included in calculations of the number of required QA collocation monitors. Please note that if PM _{2.5} SPMs operate for more than 24 months, they must be included in this calculation, as QA collocation is an Appendix A requirement; this may affect future network plans.
20.	PM _{2.5} Chemical Speciation requirements for official STN sites	App. D 4.7.4	NA	NA	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Yes, site tables	Insufficient to judge in one instance	<p>A footnote in the site tables indicates that JD Smith is not comparable to the annual PM_{2.5} NAAQS due to a siting obstruction. Siting obstructions are not included in 40 CFR 58.30 as an eligible reason for exclusion specifically from comparison to the annual NAAQS; 58.30 instead speaks to locations where PM_{2.5} concentrations are not representative of area-wide air quality but rather of relatively unique micro-scale, or localized hot spot, or unique middle-scale impacts. In addition, information provided in the site tables indicate that the monitors meet requirements in Appendix E for distance from obstructions. EPA is therefore not approving exclusion of this monitor from comparison to the annual NAAQS at this time.</p> <p>If the monitor does meet the requirements in 58.30 for exclusion, please clarify this in future requests for exclusion by describing the unique characteristics at the site that make it not representative of area-wide air quality. If instead the reasoning is that the instruments do not meet siting requirements in Appendix E, please explain specifically which siting requirements are not met. Also, if the site is not considered comparable to the NAAQS, it cannot be used to meet minimum monitoring requirements.</p> <p>Note that EPA has approved closure of this site; however, as the site is operational at least for a portion of 2017, this issue must be addressed in next year's plan.</p>
22.	Required PM _{2.5} sites represent area-wide air quality	App. D 4.7.1(b)	Yes, site tables	Yes	
23.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Yes, site tables	Yes	Sunrise Acres is the maximum concentration site for PM _{2.5} .
24.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Yes, site tables	Yes	JD Smith and Jerome Mack fulfill this requirement.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
25.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App. D 4.7.3	Yes, p. 31	NA	While this is a state requirement, DAQ indicates that Jean is an upwind background site.
26.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Yes, site tables	Yes	
27.	Frequency of flow rate verification for automated and manual PM _{2.5} monitors	App. A 3.2.1	Yes, site tables	Yes	
28.	Dates of two semi-annual flow rate audits conducted in CY2016 for PM _{2.5} monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Yes, site tables	Yes	PM _{2.5} flow rate audits were outside of the 5-7 month recommended range for Thermo 5014i monitors at all sites operating in 2016. Time between audits ranged from 8 months 9 days to 8 months 11 days.
PM₁₀ –SPECIFIC MONITORING REQUIREMENTS					
29.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Yes, p. 11	Yes	
30.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App. A 3.3.4	NA	NA	DAQ does not operate any manual PM ₁₀ monitors.
31.	Sampling schedule for PM ₁₀	58.10 (b)(4); 58.12(e); App. D 4.6	Yes, site tables	Yes	
32.	Frequency of flow rate verification for automated and manual PM ₁₀ monitors	App. A 3.3.1 and 3.3.2	Yes, site tables	Yes	
33.	Dates of two semi-annual flow rate audits conducted in CY2016 for PM ₁₀ monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Yes, site tables	Yes	PM ₁₀ flow rate audits were outside of the 5-7 month recommended range for all monitors except at Jerome Mack. Time between audits ranged from 7 months 17 days to 8 months 13 days.
Pb –SPECIFIC MONITORING REQUIREMENTS					
34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	NA	NA	Not required
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	NA	NA	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	NA	NA	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Yes, p. 36-39	Yes	EPA approved closure of Pb at NCore and DAQ terminated operation of the monitor after June 2016. DAQ included information for the period in 2016 during which the NCore Pb monitor was operating.
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Yes, p. 37	Yes	See comment for checklist item #38.
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Yes, p. 39	Yes	See comment for checklist item #38.
41.	Dates of two semi-annual flow rate audits conducted in CY2016 for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	Yes, p. 39	Yes	See comment for checklist item #38.
GENERAL GASEOUS MONITORING REQUIREMENTS					
42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Yes, site tables	Yes	
43.	Date of Annual Performance Evaluation (gaseous) conducted in CY2016	App. A 3.1.2	Yes, site tables	Yes	
O₃ -SPECIFIC MONITORING REQUIREMENTS					
44.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Yes, p. 9	Yes	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
45.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Yes, site tables	Yes	Joe Neal is currently the highest O ₃ concentration site in the MSA. However, information provided in DAQ's 2015 network assessment indicated that the current monitoring network may not be capturing the maximum expected O ₃ concentration expected within the MSA. Please continue to work with EPA on an evaluation of the maximum O ₃ concentration location.
46.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Yes, Appendix A	Yes	In Appendix A, DAQ provided documentation of EPA's approval letter dated February 29, 2016, in which EPA approved a shortened ozone monitoring season (suspending operation of monitoring stations from October to March) through March 31, 2017, for Apex, Mesquite, and Indian Springs SLAMS sites.
NO₂ –SPECIFIC MONITORING REQUIREMENTS					
47.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by 1/1/13)	App D 4.3.3	Yes, p. 11	Yes	While DAQ is meeting the requirement, Table 6 lists the number of required area-wide monitors for the MSA as 1, and the text below the table indicates that Sunrise Acres is an RA40 required site. As described in 40 CFR 58 App D 4.3.3(a) and 4.3.4(a), there is a requirement for an area-wide monitor in an area of expected highest concentration in CBSAs with population greater than 1,000,000, and the RA40 required sites are in addition to the other minimum monitoring requirements. The number of required sites for the MSA should therefore be 2. Please update this in next year's plan.
48.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013)	App D 4.3.4	Yes, p. 11	Yes	
49.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Yes, p. 11, site tables	Yes	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS					
In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:					
50.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA	NA	
51.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
52.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA	NA	
In CBSAs ≥ 1 million and AADT $\geq 250K$, the following near-roadway minimum monitoring requirements apply:					
53.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Yes, p. 13, site tables	Yes	Two near-road NO ₂ monitors are operated at Rancho & Teddy and Casino Center. The Casino Center monitor began operation in June 2016.
54.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	Yes, p. 13, site tables	Yes	One near-road CO monitor is operated at Rancho & Teddy. This monitor was operational by 1/1/2017.
55.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	Yes, p. 13, site tables	Yes	One near-road PM _{2.5} monitor is operated at Rancho & Teddy. This monitor was operational by 1/1/2017.
In CBSAs ≥ 1 million and ≤ 2.5 million AND AADT $< 250K$, the following near-roadway minimum monitoring requirements apply:					
56.	One NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3)	NA	NA	
57.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
58.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	NA	NA	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
SO₂ –SPECIFIC MONITORING REQUIREMENTS					
59.	Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Yes, p. 12	Yes	
60.	Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.)	51.1203(c)	Yes, p. 12	Yes	No monitors are required by the Data Requirements Rule for this CBSA.
NCORE –SPECIFIC MONITORING REQUIREMENTS					
61.	NCORE site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable.	App. D 3(b)	Yes, p. 34-39	Yes	
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
62.	AQS site identification number for each site	58.10 (b)(1)	Yes, site tables	Yes	
63.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes, site tables	Yes	The GPS coordinates provided for several sites are slightly different than GPS coordinates in AQS, and appear to be slightly off from the monitoring station location when viewed in Google Maps satellite view. Please review and confirm GPS coordinates in the plan and in AQS for consistency and accuracy in next year's plan.
64.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes, site tables	Yes	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
65.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, site tables	Yes	
66.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Yes, site tables	Yes	
67.	Site type for each monitor	App D 1.1.1	Yes, site tables	Yes	
68.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, site tables	Yes	While the Indian Springs O ₃ monitor does not have a network affiliation, it is missing the network affiliation row in the site table. Please include this in future plans.
69.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Yes, site tables	Yes	
70.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, site tables	Yes	
71.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes, site tables	Yes	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
72.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, site tables	Yes	
73.	Distance of monitor from nearest road	App E 6	Yes, site tables	Yes	While the site is meeting the requirement, please check the distance to nearest road for the Jean site and if needed, update this in next year's plan. Also, please clarify which road the distances and traffic counts were provided for at Indian Springs and Mesquite in next year's plan.
74.	Traffic count of nearest road	App E	Yes, site tables	Yes	
75.	Groundcover	App E 3(a)	Yes, site tables	Yes	
76.	Probe height	App E 2	Yes, site tables	Yes	
77.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Yes, site tables	Yes	
78.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes, site tables	Yes	
79.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes, site tables	Yes	
80.	Distance from the drip line of closest tree(s)	App E 5	Yes, site tables	Not meeting requirement in three instances	The plan indicates that monitors at Green Valley, Mesquite, and Palo Verde do not meet the requirement of at least 10m from the tree drip line.
81.	Distance to furnace or incinerator flue	App E 3(b)	Yes, site tables	Yes	
82.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes, site tables	Yes	
83.	Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, site tables	Yes	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
84.	Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Yes, site tables	Yes	Residence time for CO at Rancho & Teddy is listed as "2.0 (est)." As this monitor was not yet operating in 2016, DAQ is meeting the requirement. However, please confirm the residence time for this monitor in next year's plan.

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	No
Were comments included in ANP submittal?	NA
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	NA
Were S/L/T responses to substantive comments included in ANP submittal?	NA
Were the S/L/T responses to substantive comments adequate?	NA
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	NA
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	NA

APPENDIX C

Excerpt from
NDEP 2015 Ozone Interstate Transport
Analysis

APPENDIX E

Interstate Transport Analysis for the 2015 8-Hour Primary Ozone National Ambient Air Quality Standard

E.1 INTRODUCTION

Section 110(a)(2)(D)(i)(I) of the Clean Air Act (CAA), also called the “good neighbor” provision, requires each state to prohibit emissions that contribute significantly to nonattainment in, or interfere with maintenance by, any other state with respect to any primary or secondary national ambient air quality standard (NAAQS). The Nevada Division of Environmental Protection (NDEP) analyzed the impact of transport of anthropogenic ozone and ozone precursor emissions from Nevada sources to nonattainment and maintenance receptor areas in nearby states, other western states and eastern states. The NDEP used the following U.S. Environmental Protection Agency (USEPA) resources to conduct this analysis.

- *Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I)*. Memorandum from Peter Tsirigotis, Director, USEPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. March 27, 2018. Available at: https://www.epa.gov/sites/production/files/2018-03/documents/transport_memo_03_27_18_1.pdf.
- *2015 Ozone NAAQS Interstate Transport Assessment Design Values and Contributions*. This file contains projected 2023 design values and 2023 ozone contributions at individual monitoring sites. Available at: <https://www.epa.gov/airmarkets/march-2018-memo-and-supplemental-information-regarding-interstate-transport-sips-2015>
- *Notice of Availability of the Environmental Protection Agency’s Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard (NAAQS)*, 82 FR 1733 (January 6, 2017). Available at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2016-0751-0001>
- *Supplemental Information on the Interstate Transport State Implementation Plan Submissions for the 2008 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I)*. Memorandum from Stephen D. Page, Director, USEPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. October 27, 2017. Available at: https://www.epa.gov/sites/production/files/2017-10/documents/final_2008_o3_naaqs_transport_memo_10-27-17b.pdf. This memorandum includes links to all supporting documentation, including modeling and emissions technical support documents.

The NDEP followed the USEPA’s four-step framework¹ (also referred to as the CSAPR [Cross-State Air Pollution Rule] framework) to address the requirements of the good neighbor provision for ozone. The framework consists of:

- 1) identify downwind air quality problems;
- 2) identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis;
- 3) identify the emissions reduction necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems; and
- 4) adopt permanent and enforceable measures needed to achieve those emissions reductions.

The following sections address the four-step framework, beginning with the identification of 2023 nonattainment and maintenance monitors.

E.2 IDENTIFICATION OF DOWNWIND AIR QUALITY PROBLEMS

Step 1 of the CSAPR framework is identify downwind air quality problems. The USEPA uses modeling to identify potential future downwind air quality problems. For the 2015 ozone NAAQS, the USEPA selected 2023 as the analytic year in their modeling analysis, primarily because it aligns with the attainment year for Moderate ozone nonattainment areas. On March 27, 2018, the USEPA provided newly available contribution modeling results. The USEPA’s goal in providing this information is to assist states’ efforts to develop good neighbor State Implementation Plans (SIPs) for the 2015 ozone NAAQS to address their interstate transport obligations.²

“EPA identified nonattainment receptors as those monitoring sites with current measured values exceeding the NAAQS that also have projected (i.e., in 2023) average design values exceeding the NAAQS. USEPA identified maintenance receptors as those monitoring sites with maximum design values exceeding the NAAQS, This included sites with current measured values below the NAAQS with projected average and maximum design values exceeding the NAAQS, and monitoring sites with projected average design values below the NAAQS but with projected maximum design values exceeding the NAAQS.”³

The USEPA contribution modeling identified twelve (the Tsirigotis memo misidentifies the number of nonattainment receptors as eleven) monitoring sites outside of California as 2023 potential nonattainment receptors and fourteen monitoring sites outside of California as potential

¹ Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I). Memorandum from Peter Tsirigotis, Director, USEPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. March 27, 2018. Available at: https://www.epa.gov/sites/production/files/2018-03/documents/transport_memo_03_27_18_1.pdf. Pages 2-3.

² Ibid.

³ Ibid, page 4

maintenance receptors scattered among eight states. The contribution modeling also identified a combination of forty-three nonattainment receptors and six maintenance receptors scattered across thirteen counties of California.⁴ See Table E1 and Table E2.

Table E1. Nonattainment and Maintenance Receptors Outside of California.

State	County	Site ID	Nonattainment	Maintenance
Arizona	Maricopa	40130019		X
	Maricopa	40131004		X
Colorado	Arapahoe	80050002		X
	Douglas	80350004	X	
	Jefferson	80590006	X	
	Jefferson	80590011		X
	Larimer	80690011	X	
	Weld	81230009		X
Connecticut	Fairfield	90010017		X
	Fairfield	90013007	X	
	Fairfield	90019003	X	
	New Haven	90099002	X	
Maryland	Harford	240251001	X	
Michigan	Allegan	260050003		X
	Wayne	261630019		X
New York	Queens	360810124		X
	Richmond	360850067	X	
	Suffolk	361030002	X	
Texas	Brazoria	480391004	X	
	Denton	481210034		X
	Harris	482010024		X
	Harris	48011034		X
	Harris	482011039	X	
	Tarrant	484392003	X	
Wisconsin	Milwaukee	550790085		X
	Sheboygan	551170006		X

In summary, the USEPA's modeling has identified forty-five 2023 nonattainment monitors, forty-three in California and twelve in other states, and twenty 2023 maintenance monitors, six in California and fourteen in other states. The following section identifies upwind states contributing to 2023 nonattainment and maintenance receptors.

E.3 IDENTIFICATION OF UPWIND CONTRIBUTING STATES

Step 2 of the CSAPR framework is identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis. In this analysis, the

⁴ Ibid, Attachment B.

NDEP has used the USEPA’s contribution modeling to identify and quantify contributions greater than 0.5 percent of the 2015 ozone NAAQS resulting from Nevada’s anthropogenic emissions to: all receptors in Nevada, non-violating (attainment) receptors in other states, and nonattainment and maintenance receptors in other states. Although the NDEP has analyzed contributions greater than 0.5 percent, neither the USEPA nor the NDEP has identified a contribution threshold to define contribute enough to warrant further review and analysis for the 2015 ozone NAAQS.

Table E2. Nonattainment and Maintenance Receptors in California.

County	Nonattainment	Maintenance
Fresno	5	--
Imperial	2	--
Kern	5	1
Kings	1	--
Los Angeles	7	--
Madera	1	--
Merced	--	1
Riverside	9	--
Sacramento	1	1
San Bernardino	9	--
Stanislaus	1	--
Tulare	2	2
Ventura	--	1

E.3.1 Contribution Threshold

Although the NDEP does not support its use in the western United States, CSAPR used a screening threshold (1 percent of the NAAQS) to identify contributing upwind states warranting further review and analysis. States whose air quality impact (for ozone the impacts would include those from volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) and from all sectors) to at least one downwind problem receptor was greater than or equal to the threshold were identified as needing further evaluation for action to address transport. States whose air quality impacts to all downwind problem receptors were below this threshold were identified as states not requiring further evaluation for actions to address transport—that is, these states had no emissions reduction obligation under the “Good Neighbor” Provision.⁵

The USEPA recently released guidance on significant impact levels (SILs) for ozone, identified at 1.0 parts per billion (ppb), in the Prevention of Significant Deterioration (PSD) permitting program. The USEPA believes that the application of this SIL in the manner described in the

⁵ Information on the Interstate Transport “Good Neighbor” Provision for the 2008 Ozone NAAQS under the CAA Section 110(a)(2)(D)(i)(I). Memorandum from Steven D. Page, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. January 22, 2015. Available at: <http://www.epa.gov/sites/production/files/2015-11/documents/goodneighborprovision2008naaqs.pdf>.

guidance would be sufficient in most situation for a permitting authority to conclude that a proposed source will not cause or contribute to a violation of an ozone NAAQS, while noting that the document is guidance and not a final determination. The USEPA also notes a permitting authority can reasonably conclude that emission of a proposed sources that have a projected impact below the SIL are not the reason for, responsible for, or the “but for” cause of a NAAQS violation.⁶

The NDEP believes the application of the CSAPR threshold to the western United States is a very conservative approach since interstate contributions in the West are relatively small, especially given the large contributions from background and intrastate emissions. The ozone SIL, as a compliance demonstration tool in the PSD program, provides further evidence that the CSAPR screening threshold is a conservative approach to identify contributing upwind states.

E.3.2 Reliance on U.S. EPA Contribution Modeling

The NDEP’s transport analysis utilized EPA’s 2023 contribution modeling results to determine Nevada’s contributions to nonattainment and maintenance receptors in other states. The NDEP has previously commented on the USEPA’s ozone NAAQS rulemaking, characterization of ozone background, modeling platforms, and implementation guidance, as well as supporting comments from the Western States Air Resources (WESTAR) Council. See Attachment A, Table E-A4.

Although models can always be refined and there may be differences in certain approaches to technical issues as the NDEP has commented, it is the NDEP’s position that the USEPA’s modeling is state-of-the-science given the USEPA’s constraints. It is also the NDEP’s position that the USEPA’s contribution modeling is the best available data with which to conduct Nevada’s transport analysis.

E.3.3 Contribution Analysis

The USEPA has identified 2023 nonattainment and maintenance receptors in three western states, Arizona, California, and Colorado based on observational data and modeling. The NDEP has analyzed the contribution of 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to projected 2023 ozone concentrations at each air quality receptor site. See Tables E-A1, E-A2, and E-A3 in Attachment A, which are based on *2015 Ozone NAAQS Interstate Transport Assessment Design Values and Contributions* (see page E-1).

These tables show:

- the monitor identifier;
- state and county of the monitor location;

⁶ Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program. Memorandum from Peter Tsigotis, Director, USEPA Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions 1-10. April 17, 2018. Available at: <https://www.epa.gov/nsr/significant-impact-levels-ozone-and-fine-particles>.

- 2009-2013 average and maximum design values in parts per billion (ppb) based on observational data;
- 2023 modeled average and maximum design values in ppb (the monitor and model design values are used to determine which monitors are nonattainment and which are maintenance);
- the percentage contribution (as percentage of the NAAQS) to 2023 design values resulting from Nevada's anthropogenic emissions (sorted from most to least contribution); and
- the intrastate (from within the state), interstate (from other states), and background contribution (the sum of contributions from Canada and Mexico, Offshore, Fire, Initial and Boundary Conditions, and Biogenic) in ppb and percentage of the NAAQS.

The contribution modeling reveals Nevada emissions contribute from approximately 1 to 15 percent to 2023 design values for monitors located in Nevada (Table E-A1), while contributing a maximum of 1.7 percent to 2023 design values for non-violating (attainment) monitors located outside of Nevada (Table E-A2). Nevada's largest contribution to a 2023 nonattainment or maintenance receptor located outside of Nevada is 0.9 percent (Table E-A3). Tables E-A2 and E-A3 show contributions to any nonattainment or maintenance receptor resulting from Nevada emissions greater than 0.5 percent of the 2015 ozone NAAQS.

Table E-A3 shows Nevada's contributions to nonattainment and maintenance receptors located outside the State greater than 0.5 percent. These contributions are limited to receptors located only in California and Colorado.

Nevada's contributions to 2023 nonattainment and maintenance receptors in California ranges from 0.5 to 0.9 percent, while intrastate contributions to these monitors ranges from 41 to 51 percent. Interstate contributions to these California monitors range from 1 to 2 percent, with background contributing from 49 to 65 percent. These data confirm that local California sources and background each contribute about half to these nonattainment and maintenance monitors with very little contribution resulting from the transport of out-of-state anthropogenic precursor emissions.

All but one of these California nonattainment and maintenance monitors, 60675003 in Sacramento County, are located in the San Joaquin Valley. The monitor in Sacramento is located in the Sacramento Metro area. Figure E-1 shows the location and classification of 2008 ozone nonattainment areas in California. The Sacramento Metro area is classified as a Severe-15 Nonattainment Area and the San Joaquin Valley is classified as an Extreme Nonattainment Area for the 2008 ozone NAAQS. Figure E-2 shows both of these areas are designated nonattainment

for the 2015 ozone NAAQS, with the San Joaquin Valley classified as Extreme and the Sacramento Metro area classified as Moderate⁷.

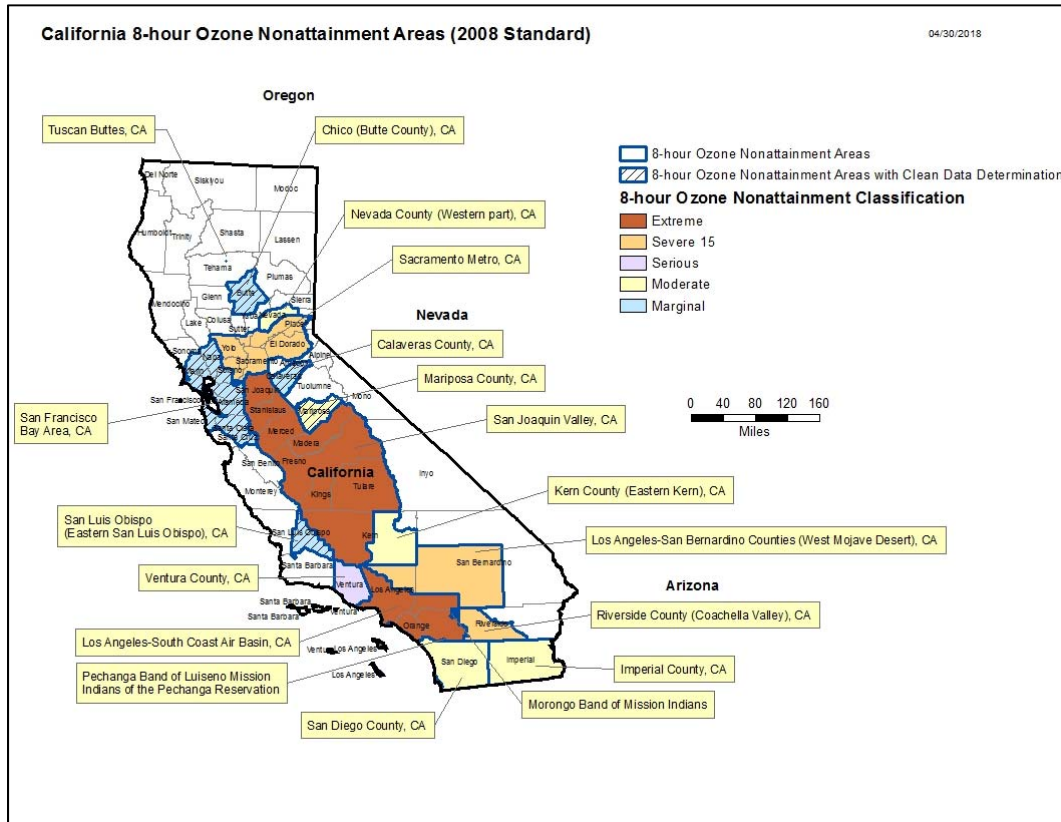


Figure E-1. 8-Hour Ozone (2008) California Nonattainment Area Map.

Available from: https://www3.epa.gov/airquality/greenbook/ca8_2008.html.

Nevada's contributions to 2023 nonattainment and maintenance receptors in Colorado is 0.5 percent, while intrastate contributions to these monitors ranges from 31 to 35 percent. Interstate contributions to these Colorado monitors range from 9 to 10 percent, with background contributing from 56 to 61 percent. These data show that local Colorado sources contribute roughly a third while background contributes from half to nearly two thirds to these nonattainment and maintenance monitors. However, interstate contributions, resulting from the transport of out-of-state anthropogenic precursor emissions, are nearly 10 percent, representing contributions greater than 0.1 percent from 17 (Larimer County receptor) to 21 (Jefferson County receptor) states. Notably, California, Utah, and Wyoming all contribute greater than 1 percent of the NAAQS to both of these Colorado receptors. Texas contributes greater than 1 percent only to the Jefferson County receptor. See Table E3.

⁷ *Nonattainment and Unclassifiable Area Designations for the 2015 Ozone Standards – April 30, 2018.* Available at: https://www.epa.gov/sites/production/files/2018-04/documents/placeholder_1.pdf

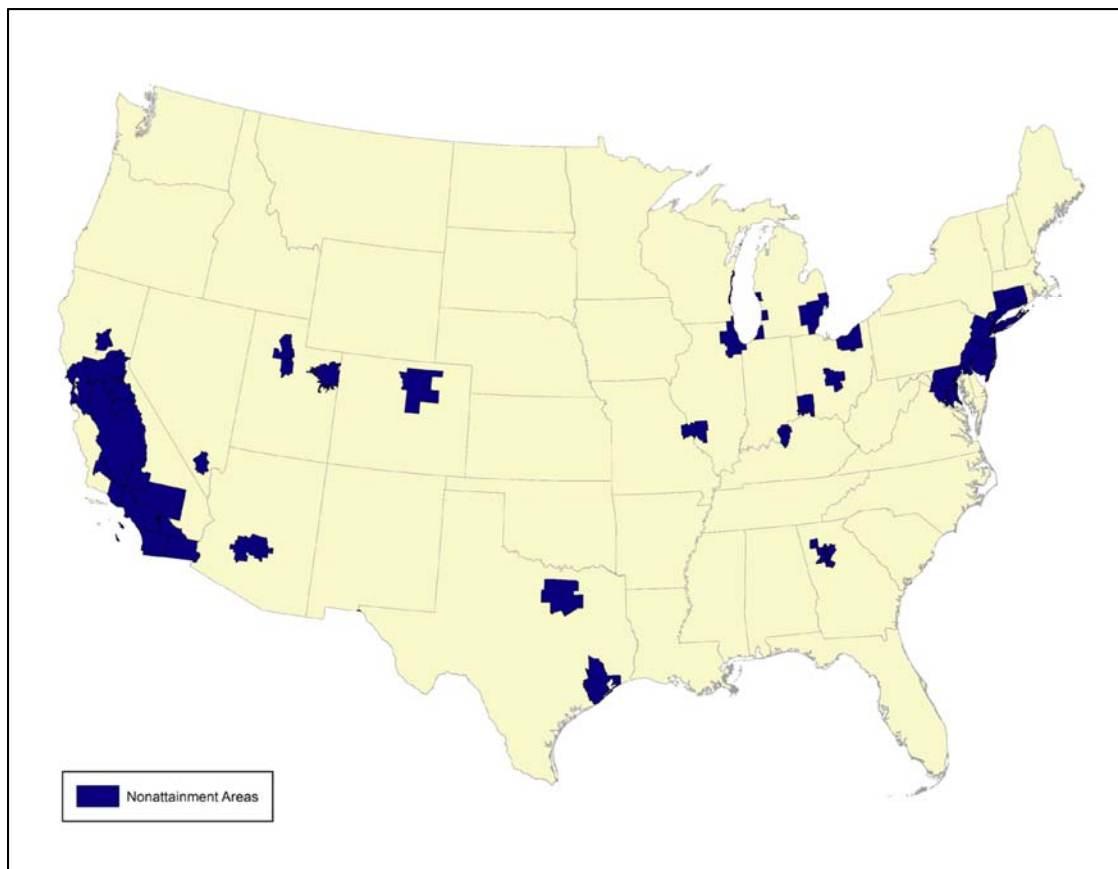


Figure E-2. Nonattainment Area Designations for the 2015 Ozone Standards
April 30, 2018.

Available at: https://www.epa.gov/sites/production/files/2018-04/documents/placeholder_3.pdf.

These Colorado monitors are located in the Denver-Boulder-Greeley-Ft. Collins-Loveland Moderate Nonattainment Area for the 2008 ozone NAAQS (Figure E-3) and Denver Metro/North Front Range Marginal Nonattainment Area for the 2015 ozone NAAQS⁸ (see Figure E-2).

⁸ Ibid.

Table E3. Interstate Contributions to Nonattainment and Maintenance Monitors in Colorado.

State	80590011		80690011		State	80590011		80690011	
	Jefferson		Larimer			Jefferson		Larimer	
State	ppb	%	ppb	%	State	ppb	%	ppb	%
AL	0.01	0.01%	--	--	NC	--	--	--	--
AR	0.02	0.03%	--	--	ND	--	--	--	--
AZ	0.30	0.43%	0.46	0.66%	NE	0.36	0.51%	0.25	0.36%
CA	1.50	2.14%	1.55	2.21%	NH	--	--	--	--
CO	24.72	35.31%	21.74	31.06%	NJ	--	--	--	--
CT	--	--	--	--	NM	0.38	0.54%	0.52	0.74%
DC	--	--	--	--	NV	0.38	0.54%	0.37	0.53%
DE	--	--	--	--	NY	--	--	--	--
FL	--	--	--	--	OH	--	--	--	--
GA	--	--	--	--	OK	0.18	0.26%	0.05	0.07%
IA	--	--	--	--	OR	0.10	0.14%	0.10	0.14%
ID	0.12	0.17%	0.13	0.19%	PA	--	--	--	--
IL	--	--	--	--	RI	--	--	--	--
IN	--	--	--	--	SC	--	--	--	--
KS	0.32	0.46%	0.10	0.14%	SD	0.02	0.03%	0.03	0.04%
KY	--	--	--	--	TN	--	--	--	--
LA	0.04	0.06%	0.02	0.03%	Tribal	0.16	0.23%	0.25	0.36%
MA	--	--	--	--	TX	0.94	1.34%	0.40	0.57%
MD	--	--	--	--	UT	1.04	1.49%	1.05	1.50%
ME	--	--	--	--	VA	--	--	--	--
MI	--	--	--	--	VT	--	--	--	--
MN	--	--	--	--	WA	0.03	0.04%	0.10	0.14%
MO	0.02	0.03%	--	--	WI	--	--	--	--
MS	0.01	0.01%	--	--	WV	--	--	--	--
MT	0.02	0.03%	0.07	0.10%	WY	1.03	1.47%	0.88	1.26%

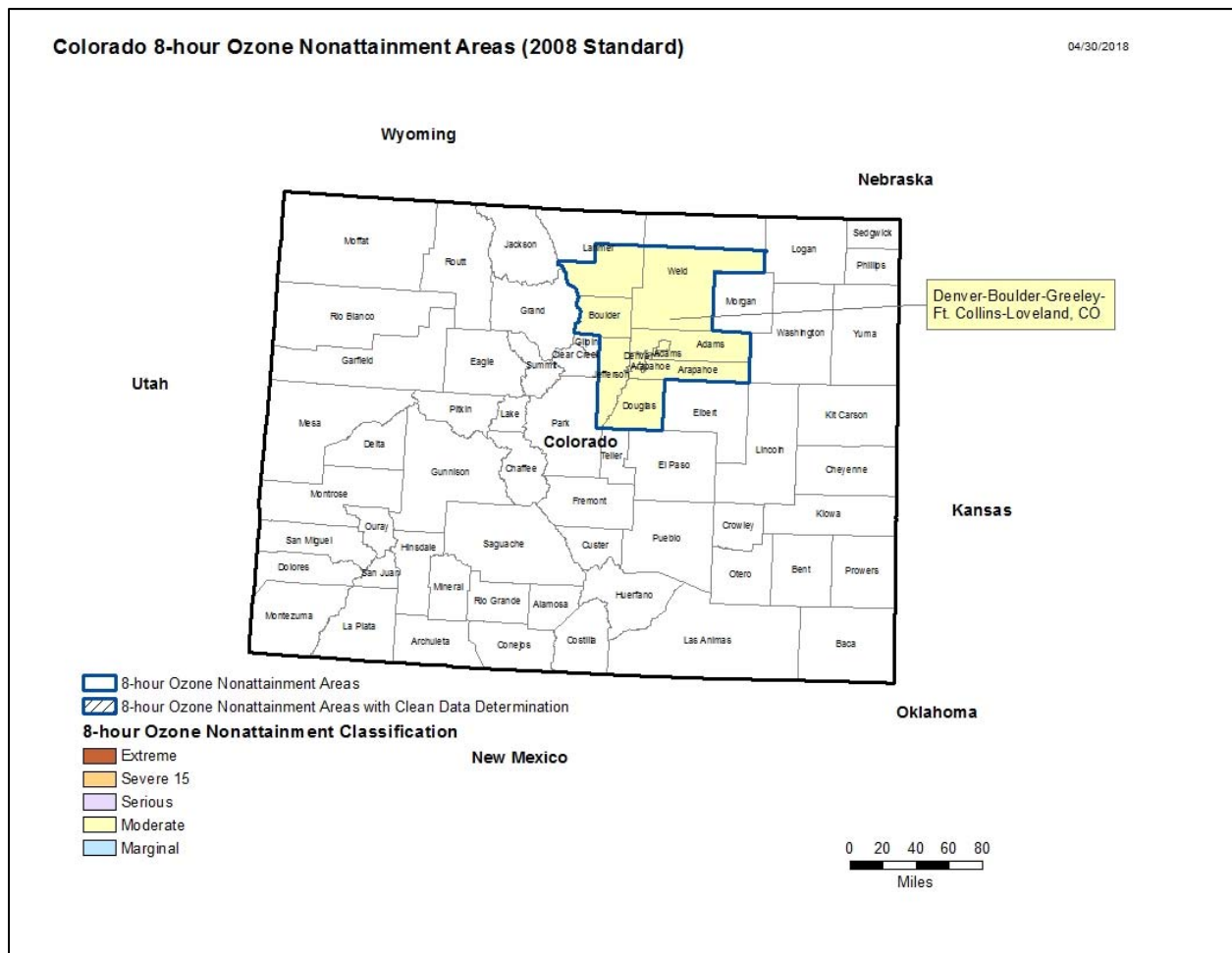


Figure E-3. 8-Hour Ozone (2008) California Nonattainment Area Map.

Available from: https://www3.epa.gov/airquality/greenbook/co8_2008.html.

In summary, the contribution of 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to any projected 2023 nonattainment or maintenance receptor at greater than 0.5 percent of the NAAQS is limited to two states, California and Colorado. Nevada's contribution to these receptors is less than one percent of the 2015 ozone NAAQS. This section has addressed Step 2 of the CSAPR framework, identify upwind states that contribute enough to those downwind air quality problems to warrant further review and analysis.

The following section identifies the emissions reductions necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems.

E.4 IDENTIFICATION OF NECESSARY EMISSIONS REDUCTIONS

Step 3 of the CSAPR framework is to identify the emissions reduction necessary (if any), considering cost and air quality factors, to prevent an identified upwind state from contributing significantly to those downwind air quality problems. The USEPA contribution modeling has quantified the contribution to nonattainment and maintenance receptors resulting from 2023 base case anthropogenic NO_x and VOC emissions from sources within Nevada to projected 2023 ozone concentrations at each air quality receptor site.

The analysis of Nevada's contributions above demonstrate that Nevada's emissions do not contribute significantly to any 2023 nonattainment or maintenance receptor for 2015 ozone NAAQS. Contributions to nonattainment and maintenance receptors where Nevada has the largest contributions (less than 1 percent of the NAAQS), intrastate and background contributions are sub-equal with maximum interstate contributions of approximately 2 percent. At the Colorado nonattainment and maintenance receptors the interstate contribution is nearly 10 percent but Nevada's contribution is just over 0.5 percent.

The USEPA's quantification of the 2023 contributions resulting from Nevada's emissions to nonattainment and maintenance receptors documents that the emissions from Nevada do not contribute significantly to nonattainment areas, or interfere with maintenance, in any other state. Therefore, the NDEP has determined the identification of emissions reductions necessary to prevent Nevada from contributing significantly to downwind air quality problems is moot.

E.5 CONCLUSION

In conclusion, no emissions reductions are needed from Nevada sources to prevent significant contributions to downwind air quality problems. Therefore, the NDEP will not address Step 4 of the CSAPR framework, adopt permanent and enforceable measures needed to achieve those emissions reductions, as no emissions reductions are needed from Nevada based on analysis of all relevant information.

Attachment A

Table E-A1. Nevada's Contributions to 2023 Ozone Design Values for Monitors in Nevada.

Site ID	State	County	2009-2013 Avg DV	2009-2013 Max DV	2023 Avg DV	2023 Max DV	Nevada Contributions as % of NAAQS	Intrastate Contributions	Intrastate Contributions as % of NAAQS	Interstate Contributions	Interstate Contributions as % of NAAQS	Background Contributions	Background Contributions as % of NAAQS
320032002	Nevada	Clark	71.7	73.0	63.4	64.5	14.87%	10.41	14.87%	7.34	10.49%	45.52	65.03%
320030075	Nevada	Clark	76.0	77.0	67.4	68.3	14.09%	9.86	14.09%	7.60	10.86%	49.81	71.16%
320030071	Nevada	Clark	75.3	76.0	68.7	69.4	13.34%	9.34	13.34%	7.09	10.13%	52.12	74.46%
320030073	Nevada	Clark	74.7	76.0	68.2	69.4	13.24%	9.27	13.24%	7.05	10.07%	51.73	73.90%
320030043	Nevada	Clark	74.7	76.0	67.7	68.8	12.19%	8.53	12.19%	6.91	9.87%	52.12	74.46%
320030538	Nevada	Clark	71.0	72.0	62.9	63.8	12.19%	8.53	12.19%	7.61	10.87%	46.63	66.61%
320030540	Nevada	Clark	71.0	71.0	62.9	62.9	12.19%	8.53	12.19%	7.61	10.87%	46.63	66.61%
320190006	Nevada	Lyon	68.5	69.0	62.1	62.5	5.90%	4.13	5.90%	3.56	5.09%	54.33	77.61%
320311005	Nevada	Washoe	67.3	68.0	59.9	60.5	5.49%	3.84	5.49%	4.28	6.11%	51.71	73.87%
320030601	Nevada	Clark	72.0	72.0	65.7	65.7	3.21%	2.25	3.21%	7.37	10.53%	55.93	79.90%
320310020	Nevada	Washoe	67.0	68.0	60.1	61.0	3.04%	2.13	3.04%	3.83	5.47%	54.08	77.26%
320310016	Nevada	Washoe	66.0	67.0	59.2	60.1	3.00%	2.10	3.00%	3.77	5.39%	53.26	76.09%
320312009	Nevada	Washoe	67.0	68.0	60.1	61.0	2.89%	2.02	2.89%	4.18	5.97%	53.84	76.91%
320312002	Nevada	Washoe	61.7	62.0	55.2	55.5	1.96%	1.37	1.96%	5.45	7.79%	48.30	69.00%
320310025	Nevada	Washoe	66.3	67.0	60.0	60.6	1.57%	1.10	1.57%	3.72	5.31%	55.12	78.74%
325100002	Nevada	Carson City	66.0	66.0	60.2	60.2	1.53%	1.07	1.53%	3.90	5.57%	55.15	78.79%
320330101	Nevada	White Pine	72.0	74.0	65.8	67.7	1.50%	1.05	1.50%	4.74	6.77%	59.86	85.51%
320031019	Nevada	Clark	74.3	75.0	66.8	67.4	1.11%	0.78	1.11%	9.28	13.26%	56.58	80.83%

Table E-A2. Nevada's Contributions to 2023 Ozone Design Values for Attainment Monitors Outside of Nevada.

Site ID	State	County	2009-2013 Avg DV	2009-2013 Max DV	2023 Avg DV	2023 Max DV	Nevada Contributions as % of NAAQS	Intrastate Contributions	Intrastate Contributions as % of NAAQS	Interstate Contributions	Interstate Contributions as % of NAAQS	Background Contributions	Background Contributions as % of NAAQS
490352004	Utah	Salt Lake	74.0	76.0	65.4	67.1	1.71%	14.70	21.00%	5.51	7.87%	45.04	64.34%
490530006	Utah	Washington	67.0	67.0	61.4	61.4	1.57%	0.99	1.41%	8.06	11.51%	52.21	74.59%
490353006	Utah	Salt Lake	76.0	76.0	65.8	65.8	1.56%	11.23	16.04%	5.94	8.49%	48.49	69.27%
490570002	Utah	Weber	71.7	72.0	64.0	64.3	1.39%	10.07	14.39%	4.90	7.00%	48.90	69.86%
490110004	Utah	Davis	69.3	71.0	60.0	61.5	1.31%	11.17	15.96%	4.48	6.40%	44.21	63.16%
490571003	Utah	Weber	72.7	74.0	65.3	66.5	1.20%	8.80	12.57%	4.85	6.93%	51.50	73.57%
490490002	Utah	Utah	70.0	73.0	62.7	65.4	1.16%	4.59	6.56%	5.49	7.84%	52.50	75.00%
490530130	Utah	Washington	71.7	73.0	65.8	67.0	0.97%	0.63	0.90%	7.96	11.37%	57.06	81.51%
60390004	California	Madera	79.3	81.0	68.6	70.1	0.80%	27.63	39.47%	1.27	1.81%	39.59	56.56%
490131001	Utah	Duchesne	68.0	68.0	62.0	62.0	0.80%	1.50	2.14%	4.22	6.03%	56.12	80.17%
490071003	Utah	Carbon	69.0	69.0	61.1	61.1	0.79%	2.54	3.63%	3.99	5.70%	54.48	77.83%
560370300	Wyoming	Sweetwater	66.0	66.0	60.0	60.0	0.79%	1.77	2.53%	6.50	9.29%	51.58	73.69%
60570005	California	Nevada	77.7	79.0	62.3	63.3	0.69%	21.10	30.14%	1.27	1.81%	39.86	56.94%
60570007	California	Nevada	76.0	78.0	60.7	62.3	0.60%	21.41	30.59%	1.25	1.79%	37.97	54.24%
60610004	California	Placer	74.0	75.0	58.9	59.7	0.57%	23.36	33.37%	1.18	1.69%	34.30	49.00%
490370101	Utah	San Juan	68.7	69.0	63.6	63.9	0.57%	0.65	0.93%	6.43	9.19%	56.38	80.54%
60610006	California	Placer	84.0	86.0	68.6	70.2	0.54%	31.66	45.23%	1.32	1.89%	35.53	50.76%
60670002	California	Sacramento	76.7	77.0	64.8	65.0	0.53%	28.01	40.01%	1.39	1.99%	35.30	50.43%
80013001	Colorado	Adams	76.0	76.0	70.8	70.8	0.51%	24.78	35.40%	6.84	9.77%	38.99	55.70%
80590002	Colorado	Jefferson	74.0	74.0	66.7	66.7	0.51%	23.25	33.21%	6.58	9.40%	36.70	52.43%

Table E-A3. Nevada's Contributions to 2023 Ozone Design Values for Nonattainment and Maintenance Monitors Outside of Nevada.

Site ID	State	County	2009-2013 Avg DV	2009-2013 Max DV	2023 Avg DV	2023 Max DV	Nevada Contributions as % of NAAQS	Instate Contributions	Intrastate Contributions as % of NAAQS	Interstate Contributions	Interstate Contributions as % of NAAQS	Background Contributions	Background Contributions as % of NAAQS
60392010	California	Madera	85.0	86.0	72.1	72.9	0.93%	28.39	40.56%	1.44	2.06%	42.17	60.24%
60190242	California	Fresno	91.7	95.0	79.4	82.2	0.91%	31.98	45.69%	1.47	2.10%	45.83	65.47%
60296001	California	Kern	84.3	86.0	70.9	72.4	0.83%	28.50	40.71%	1.07	1.53%	41.25	58.93%
60190007	California	Fresno	94.7	95.0	79.2	79.4	0.73%	35.68	50.97%	1.17	1.67%	42.24	60.34%
60190011	California	Fresno	93.0	96.0	78.6	81.2	0.63%	35.20	50.29%	1.10	1.57%	42.20	60.29%
60675003	California	Sacramento	86.3	88.0	69.9	71.3	0.63%	34.18	48.83%	1.03	1.47%	34.62	49.46%
60470003	California	Merced	82.7	84.0	69.9	71.0	0.56%	28.52	40.74%	0.98	1.40%	40.32	57.60%
60195001	California	Fresno	97.0	99.0	79.6	81.2	0.54%	35.79	51.13%	0.88	1.26%	42.83	61.19%
60290014	California	Kern	87.7	89.0	74.1	75.2	0.54%	31.54	45.06%	0.94	1.34%	41.52	59.31%
80590011	Colorado	Jefferson	78.7	82.0	70.9	73.9	0.54%	24.72	35.31%	6.98	9.97%	39.01	55.73%
80690011	Colorado	Larimer	78.0	80.0	71.2	73.0	0.53%	21.74	31.06%	6.33	9.04%	42.96	61.37%

Table E-A4. Summary of NDEP Comment Letters Applicable to Ozone NAAQS, 2014-2017.

Federal Register Notice	Rule Description	Subject	Docket and Document ID (link to comments)
2017			
81 FR 391894	Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements	2/9/2017 NDEP comments on USEPA's Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements	EPA-HQ-OAR-2016-0202-0069
81 FR 391894	Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements	2/13/2017 WESTAR comments on USEPA's Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements	EPA-HQ-OAR-2016-0202-0080
2016			
NA	Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5 & Regional Haze	3/12/2016 NDEP comments on Modeling Guidance for Demonstrating Attainment of Air Quality Goals for Ozone, PM2.5 & Regional Haze	submitted to Brian Timin, USEPA, AQMG
NA	Implementation of the 2015 Primary Ozone NAAQS: Issues Associated with Background Ozone	5/11/2016 WESTAR comments on USEPA's Implementation of the 2015 Primary Ozone NAAQS: Issues Associated with Background Ozone White Paper for Discussion	EPA-HQ-OAR-2016-0097-0034

Table E-A4. Summary of NDEP Comment Letters Applicable to Ozone NAAQS, 2014-2017 (continued).

Federal Register Notice	Rule Description	Subject	Docket and Document ID (link to comments)
2015			
79 FR 75234	National Ambient Air Quality Standards for Ozone	3/12/2015 NDEP comments on National Ambient Air Quality Standards for Ozone	EPA-HQ-OAR-2008-0699-1741
79 FR 75234	National Ambient Air Quality Standards for Ozone	3/16/2015 WESTAR comments on National Ambient Air Quality Standards for Ozone	EPA-HQ-OAR-2008-0699-1990
80 FR 45340	Revisions to the Guideline on Air Quality Models: Enhancement to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter	10/16/2015 NDEP comments on USEPA's Proposed Rule Regarding AERMOD	EPA-HQ-OAR-2015-0310-0080
2014			
78 FR 70935	Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform	3/31/2014 NDEP comments on USEPA's 2011 NEI emissions modeling platform (for use in ozone transport modeling and more)	EPA-HQ-OAR-2013-0743-0047
78 FR 70935	Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform	4/9/2014 WESTAR comments on USEPA's 2011 and 2018 Modeling Platforms	Comment Letter
78 FR 70935	Notice of Availability of the Environmental Protection Agency's 2011 Emissions Modeling Platform	6/11/2014 WESTAR comments on USEPA's emissions modeling platform	Comment Letter

APPENDIX D

Documentation of Public Review Process

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BOARD OF COUNTY COMMISSIONERS MEETING – 8/21/18 (to conduct public hearing)

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**30-DAY PUBLIC COMMENT PERIOD:
Notice of Public Comment and Public Hearing**

**NOTICE OF PUBLIC COMMENT PERIOD AND PUBLIC HEARING
ON THE PROPOSED OZONE INFRASTRUCTURE
STATE IMPLEMENTATION PLAN**

NOTICE IS HEREBY GIVEN of a public comment period and public hearing on the proposed *Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)* (I-SIP). Pursuant to the Clean Air Act and the 2015 revision of the ozone National Ambient Air Quality Standard, Clark County must prepare an I-SIP to demonstrate it has the programs in place to implement, maintain, and enforce the revised standard. If adopted, the I-SIP will be submitted to the state of Nevada and U.S. Environmental Protection Agency as a revision to the Clark County portion of the Nevada State Implementation Plan.

NOTICE IS FURTHER GIVEN that a 30-day public comment period will begin on July 3, 2018, and end at 4:00 PM on August 2, 2018. The public may review and provide written comments on the proposed I-SIP during this period. The Board of County Commissioners will consider the proposed I-SIP, along with all written and any oral public comments, at a public hearing at 10:00 AM on August 21, 2018, in the Commission Chambers, Clark County Government Center, 500 S. Grand Central Parkway, Las Vegas, NV.

Copies of the proposed I-SIP may be reviewed at the Clark County Department of Air Quality (DAQ), 4701 W. Russell Rd., Suite 200, Las Vegas, NV 89118, or on the DAQ website at <http://www.clarkcountynv.gov/airquality/Pages/default.aspx>. Copies may also be obtained by contacting Araceli Pruett at (702) 455-3206.

Any written comments must be submitted no later than 4:00 PM on August 2, 2018. Comments should be addressed to Araceli Pruett at the mailing address given above or sent via email to araceli.pruett@clarkcountynv.gov or via fax to (702) 383-9994.

Published: July 2, 2018



Marci D. Henson, Director

**30-DAY PUBLIC COMMENT PERIOD:
DAQ Website Notice #1**



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- Notices & Meetings ▶
- Planning Initiatives ▶
- Rules & Regulations ▶
- Small Business Assistance ▶
- Visibility Cameras

Air Quality

The Department of Air Quality is the air pollution control agency for all of Clark County, Nevada. Established by the Clark County Board of County Commissioners in 2001, Air Quality administers a variety of programs to improve the health and welfare of our citizens by ensuring that the quality of the air in Clark County meets healthful, regulatory standards.

Annual Emissions Inventory Reports are due March 31st! If you have a gasoline dispensing operation and have questions about completing the report, watch the short informational video below:



Department of Air Quality

Annual Emissions Inventory Reporting

for Minor Stationary Sources

Gasoline Dispensing Operations

Explore

- Smog Spotter - Report Smoking Vehicles
- Club Ride
- Enviroflash
- Nevada Wildlife Management
- Desert Conservation Program

Upcoming Events

2018 Dust Class - FULL
Jul 12, 2018

2018 Dust Class
Jul 19, 2018

2018 Dust Class
Aug 2, 2018

View All Events

Service Spotlight

Cashier Services

Hours of Operation: Monday through Friday 8:00 a.m. to 4:00 p.m.

[Read More](#)

Announcements

- [Air Quality Issues Ozone Advisory for Friday](#)
Exposure to ozone can irritate your respiratory system and cause coughing, a sore throat, chest pain and shortness of breath even in healthy people, according to the EPA. [More Information](#)
- [Proposed SIP Revision for Ozone](#)
Clark County is proposing a revision to the Clark County portion of the Nevada State Implementation Plan for the 2015 Ozone NAAQS. [More Information](#)

30-DAY PUBLIC COMMENT PERIOD: DAQ Website Notice #2


The screenshot shows the Clark County DAQ website. At the top, there is a navigation bar with links for Home, Subscribe to Newsfeed, English, and Español. Below this is a secondary navigation bar with links for Residents, Visitors, Econ. Dev., About Clark County, Elected Officials, Services, Departments, and ClarkConnect. A search bar is located on the right side of this bar.


The main content area is titled "Air Quality" and features a sub-header "7/2/2018 - Proposed SIP Revision for Ozone". Below this, there are social media sharing options for Facebook, LinkedIn, and Google+. The contact information for Araceli Pruett is provided: Phone: 702-455-3206, Email: araceli.pruett@clarkcountynv.gov.

The text states: "Clark County is proposing a revision to the Clark County portion of the Nevada State Implementation Plan for the 2015 Ozone NAAQS. The public has the opportunity to [review and comment](#) on the draft document. The 30-day public comment period is from July 3, 2018, through August 2, 2018. Comments must be received by August 2, 2018, at 4:00 PM. Written comments will be retained and considered prior to the submittal of the proposed Plan to the Clark County Board of County Commissioners (BCC). The BCC will conduct a public hearing on the Plan on August 21, 2018, at 10:00 AM in the Commission Chambers, Clark County Government Center, 500 South Grand Central Parkway, Las Vegas, NV."

At the bottom of the page, there is a large banner for "You Light It, We Write It" with the text "Use Illegal Fireworks & Be Fined Up to \$1,000 + Disposal Fees" and the website www.YouLightItWeWriteIt.Vegas. The footer contains links for Jobs, Contact Us, Title II/Title VI, Privacy Policy, and copyright information for Clark County, NV.

30-DAY PUBLIC COMMENT PERIOD: DAQ Website Notice #3

 **Air Quality Planning**



PLANNING NOTICES

Quick Look-up

Air Quality Planning

- Services ▶
- Contact Us
- About Us
- Complaints
- Monitoring ▶
- Fees ▶
- Forms & Applications ▶
- Notices & Meetings ▶
- Planning Initiatives ▶
- Rules & Regulations ▶
- Small Business Assistance ▶
- Visibility Cameras

PUBLIC NOTICE- PROPOSED SIP REVISION FOR OZONE

DAQ welcomes comments on the proposed *Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2)* (I-SIP). This I-SIP demonstrates Clark County has the programs in place to implement, maintain, and enforce the 2015 Ozone National Ambient Air Quality Standard. If adopted, the I-SIP will be submitted to the state of Nevada and U.S. Environmental Protection Agency as a revision to the Clark County portion of the Nevada State Implementation Plan.

Review Documents

[Public Notice](#)
[Proposed I-SIP](#)

Documents may also be reviewed in person at:

Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, NV 89118

Public Comment Period

Dates: July 3, 2018 - August 2, 2018

Submit comments in writing to:

Email: araceli.pruett@clarkcountynv.gov
Fax: (702) 383-9994
Mail: Araceli Pruet
 Clark County Department of Air Quality
 4701 West Russell Road, Suite 200
 Las Vegas, NV 89118

Public Hearing

Date: Tuesday, August 21, 2018
Time: 10:00 AM
Place: Commission Chambers
 Clark County Government Center
 500 South Grand Central Parkway
 Las Vegas, NV 89155

**30-DAY PUBLIC COMMENT PERIOD:
Affidavit of DAQ Website Posting**

**AFFIDAVIT OF WEBSITE POSTING OF
PUBLIC NOTICE**

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, Araceli Pruett, being first duly sworn, depose and say that I am over 18 years of age and a Planner with the Clark County Department of Air Quality (DAQ). I certify that the *Notice of Public Comment Period and Public Hearing on the Proposed Ozone Infrastructure State Implementation Plan* was posted on the DAQ website from July 2, 2018, through August 2, 2018. Below is a screenshot of the posting on the DAQ website at:

http://www.clarkcountynv.gov/airquality/planning/Pages/Planning_Notices.aspx

Air Quality Planning

PLANNING NOTICES

PUBLIC NOTICE- PROPOSED SIP REVISION FOR OZONE

DAQ welcomes comments on the proposed *Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) (I-SIP)*. This I-SIP demonstrates Clark County has the programs in place to implement, maintain, and enforce the 2015 Ozone National Ambient Air Quality Standard. If adopted, the I-SIP will be submitted to the state of Nevada and U.S. Environmental Protection Agency as a revision to the Clark County portion of the Nevada State Implementation Plan.

Review Documents

[Public Notice](#)
[Proposed I-SIP](#)

Documents may also be reviewed in person at:

Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, NV 89118

Public Comment Period

Dates: July 3, 2018 - August 2, 2018

Submit comments in writing to:

Email: araceli.pruett@clarkcountynv.gov
Fax: (702) 383-9994
Mail: Araceli Pruett
Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, NV 89118

Public Hearing

Date: Tuesday, August 21, 2018
Time: 10:00 AM
Place: Commission Chambers
Clark County Government Center
500 South Grand Central Parkway
Las Vegas, NV 89155

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Araceli Pruett
Araceli Pruett
DAQ Planner

Subscribed and sworn to before me this 8 day of August, 2018.

Brianna M Holland
NOTARY PUBLIC
My Commission Expires: 09/13/2020

BRIANNA MICHELLE HOLLAND
NOTARY PUBLIC
State of Nevada
Appt. No. 16-3901-1
My Appt. Expires September 13, 2020

**30-DAY PUBLIC COMMENT PERIOD:
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Clark County News Tips Offered to Help 1 October Survivors Cope With Noise from July 4th Fireworks

Popular Services

- Property Records Search
- Property Tax Information
- Record Land Document
- Foreclosures & Liens
- Get a Marriage License
- Marriage Certificate Copies
- Inmate Search
- Public Records
- Recreational Opportunities

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County Videos

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More Clark County News

- Proposed Revision to Nevada State Implementation Plan for 2015 Ozone NAAQS**
Clark County is proposing a revision to the Clark County portion of the Nevada State Implementation Plan for the 2015 Ozone NAAQS. [More Information](#)
- County Now Accepting Applications for OHV Advisory Committee**
The County is now taking applications for an off-highway vehicle advisory committee. Deadline for application submission is Wednesday, July 18. [More Information](#)
- Summer Day Shelters Open June 21 Through Sept. 30**
Valley shelter agencies, community centers and other locations open to provide homeless with respite during hot summer temperatures. [More Information](#)
- Vegas Strong Resiliency Center Announces New Hours**
The center is open Monday through Friday 10 a.m. to 5 p.m., excluding holidays. The Vegas Strong Resiliency Center (VSRC) is a resource and referral agency for residents, visitors and responders of the 1 October Harvest Festival Incident. [More Information](#)
- Free Legal Education Classes at the Clark County Law Library May - Aug 2018**
The Clark County Law Library is offering free classes to the public through August. [More Information](#)
- Clark County Fire Department Rural Division Seeks Volunteer**

Featured Events

- Free Criminal Record Sealing Forms Completion Clinic...**
Jul 9, 2018
- Free Estate Planning Seminar**
Jul 10, 2018
- Crafts for Kids**
Jul 12, 2018
- Free Unemployment Law Seminar**
Jul 12, 2018
- Free Criminal Record Sealing and Civil Rights Restoration...**
Jul 13, 2018
- Wildlife Talk with NDOW**
Jul 13, 2018
- Who Goes There**
Jul 14, 2018
- Nature Tales**
Jul 14, 2018

30-DAY PUBLIC COMMENT PERIOD: Clark County Website Notice #2

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- Small Business Assistance
- Visibility Cameras

Air Quality

7/2/2018 - Proposed SIP Revision for Ozone

Share 0 | LinkedIn Share | G+ Share

Contact: Araceli Pruet
Phone: 702-455-3206
Email: araceli.pruett@clarkcountynv.gov

Clark County is proposing a revision to the Clark County portion of the Nevada State Implementation Plan for the 2015 Ozone NAAQS.

The public has the opportunity to [review and comment](#) on the draft document.

The 30-day public comment period is from July 3, 2018, through August 2, 2018. Comments must be received by August 2, 2018, at 4:00 PM. Written comments will be retained and considered prior to the submittal of the proposed Plan to the Clark County Board of County Commissioners (BCC). The BCC will conduct a public hearing on the Plan on August 21, 2018, at 10:00 AM in the Commission Chambers, Clark County Government Center, 500 South Grand Central Parkway, Las Vegas, NV.

WERE YOU OR SOMEONE YOU LOVE AFFECTED ON OCTOBER 1? HELP IS HERE FOR YOU AND THOSE YOU LOVE.

VegasStrongRC.org (702) 455-2433 and (833) 299-2433

Jobs | Contact Us | Title II/Title VI | Privacy Policy | © Copyright 2015 Clark County, NV | 500 S. Grand Central Pkwy., Las Vegas, NV 89155 (702) 455-0000

**30-DAY PUBLIC COMMENT PERIOD:
Public Comment Report**

Public Notice: DAQ Website: July 2, 2018 through August 2, 2018
Clark County Website: July 9 through August 2, 2018

Public Comment Period: July 3, 2018 through August 2, 2018

Formal Comments Received: None

BOARD OF COUNTY COMMISSIONERS MEETING – 8/7/18**Agenda Item****CLARK COUNTY BOARD OF COMMISSIONERS
AGENDA ITEM****Petitioner:** Marci Henson, Director, Department of Air Quality**Recommendation:**

That the Board of County Commissioners set a public hearing on August 21, 2018, at 10:00 AM to approve, adopt, and authorize submittal of The Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) for the 2015 Ozone National Ambient Air Quality Standard to the State of Nevada and the U.S. Environmental Protection Agency for review and approval as a revision to the Nevada State Implementation Plan. (For possible action)

FISCAL IMPACT:

Fund #: N/A	Fund Name: N/A
Fund Center: N/A	Funded Program/Grant: N/A
Description: N/A	Amount: N/A
Added Comments: N/A	

BACKGROUND:

The Federal Clean Air Act and applicable federal regulations require States to submit an Infrastructure State Implementation Plan (I-SIP) within three years after the promulgation of a new or revised National Ambient Air Quality Standard (NAAQS). The purpose of the I-SIP is to demonstrate the State has the programs in place to implement, maintain, and enforce the revised standard, and is required whether or not an area is in compliance with the new NAAQS. On February 19, 2013, the Clark County Board of County Commissioners adopted the I-SIP for the 2008 Ozone (O₃) NAAQS. The U.S. Environmental Protection Agency (EPA) issued final approval of the I-SIP on November 3, 2015. Effective December 28, 2015, the EPA revised the O₃ NAAQS. The Las Vegas Valley (Hydrographic Area 212) is currently designated as a nonattainment area for the 2015 O₃ NAAQS; the remainder of the County is designated attainment/unclassifiable. The attached proposed I-SIP addresses the following air quality program elements: permitting; air quality modeling; enforcement; ambient air monitoring; and confirmation of adequate personnel, resources, and legal authorities currently in place that demonstrate Clark County's ability to implement, maintain, and enforce the 2015 O₃ NAAQS.

The proposed I-SIP was made available for public review and comment from July 3, 2018, through August 2, 2018. A public hearing on August 21, 2018, will provide the public with an additional opportunity to provide comments on the proposed I-SIP.

Respectfully submitted,



Marci Henson, Director
Department of Air Quality

Cleared for Agenda

Agenda Item #

BOARD OF COUNTY COMMISSIONERS MEETING – 8/7/18
Meeting Summary

BCC JOINT MEETING REGULAR - 8/7/2018

Page 21 of 30

- 64** Accept a donation from Walker Furniture of new mattresses to all of the Clark County Fire Stations; and present a proclamation for their generous donation. (For possible action)

ATTACHMENT: Clark County Agenda Item Template.doc

ATTACHMENT: Walker Furn..pdf

ACCEPTED/PRESENTED AS RECOMMENDED

SEC. 4. ITEMS TAKEN SEPARATELY FROM CONSENT AGENDA

SEC. 5. PUBLIC HEARINGS - 10 AM

- 65** Conduct a public hearing; and approve, adopt, and authorize the Chairman to sign the ordinance levying assessments for Special Improvement District No. 162A - Laughlin Lagoon, for dredging work in the Laughlin Lagoon Waterfront area located along and adjacent to the Colorado River in the unincorporated township of Laughlin, Nevada. (For possible action)

ATTACHMENT: Clark County Agenda Item Template.doc

ATTACHMENT: Ordinance Levying Assessments SID 162A LaughlinLagoon.pdf

CONTINUED TO TUESDAY, AUGUST 21, 2018 AT 10:00 A.M.

SEC. 6. INTRODUCTION OF ORDINANCES

This item is for introduction only. A date and time will be set for a public hearing. No public comments will be heard at this time.

- 66** Set a public hearing on August 21, 2018, at 10:00 a.m. to approve, adopt, and authorize submittal of The Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) for the 2015 Ozone National Ambient Air Quality Standard to the State of Nevada and the U.S. Environmental Protection Agency for review and approval as a revision to the Nevada State Implementation Plan. (For possible action)

ATTACHMENT: Clark County Agenda Item Template.doc

ATTACHMENT: 20180625 DRAFT Clark County O3 ISIP.pdf

PUBLIC HEARING SET FOR TUESDAY, AUGUST 21, 2018 AT 10:00 A.M.

- 67** Introduce an ordinance to amend Title 25, Chapter 25.10 of the Clark County Code to amend Section 25.10.050 to modify the minimum standards for plumbing

http://clark.granicus.com/MinutesViewer.php?view_id=17&clip_id=5944&doc_id=050aa9... 8/20/2018

BOARD OF COUNTY COMMISSIONERS MEETING – 8/21/18**Agenda Item****CLARK COUNTY BOARD OF COMMISSIONERS
AGENDA ITEM****Petitioner:** Marci Henson, Director, Department of Air Quality**Recommendation:**

That the Board of County Commissioners conduct a public hearing; approve and adopt The Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) for the 2015 Ozone National Ambient Air Quality Standard; and authorize the Director or her designee to incorporate any relevant public comments into the Plan and submit the Plan to the State of Nevada and the U.S. Environmental Protection Agency for review and approval as a revision to the Nevada State Implementation Plan. (For possible action)

FISCAL IMPACT:

Fund #: N/A	Fund Name: N/A
Fund Center: N/A	Funded Program/Grant: N/A
Description: N/A	Amount: N/A
Added Comments: N/A	

BACKGROUND:

Federal law and regulations require States to submit an Infrastructure State Implementation Plan (I-SIP) within three years after the promulgation of a new or revised National Ambient Air Quality Standard (NAAQS). The purpose of the I-SIP is to demonstrate the State has the programs in place to implement, maintain, and enforce the revised standard. On February 19, 2013, the Board of County Commissioners (Board) adopted the Ozone (O₃) I-SIP for the 2008 O₃ NAAQS. The U.S. EPA issued final approval of the I-SIP on November 3, 2015. Effective December 28, 2015, EPA revised the O₃ NAAQS. The Las Vegas Valley is currently designated as a nonattainment area for the 2015 O₃ NAAQS. The attached I-SIP describes the air quality program elements currently in place that show the County's ability to implement, maintain, and enforce the 2015 O₃ NAAQS.

Appendices C and D contain documents that will be completed at a later time. Appendix C contains a draft of the Nevada Division of Environmental Protection's (NDEP) 2015 Ozone Interstate Transport that further supports the requirements of I-SIP Element (D)(i)(I). The analysis is under public review and comment until August 29, 2018. The Department of Air Quality (DAQ) does not anticipate that any changes made to the analysis will impact the County's portion of the I-SIP. Appendix C will be updated with the final analysis once approved through NDEP's process. Appendix D contains documentation of the public review process. Information not yet included in Appendix D will be added after the public hearing and upon Board approval of the I-SIP.

Notice of a 30-day public review and comment period from July 3, 2018 through August 2, 2018, was posted on the DAQ and County websites. The proposed I-SIP was available for review on the DAQ website and at the DAQ office at 4701 West Russell Road, Suite 200. No comments were received during the comment period. Staff recommends that the Board approve and adopt the I-SIP, and authorize staff to incorporate any relevant public comments into the plan and submit it to the State of Nevada and EPA for approval as a revision to the Nevada State Implementation Plan.

Respectfully submitted,



Marci Henson, Director
Department of Air Quality

Cleared for Agenda

Agenda Item #

BOARD OF COUNTY COMMISSIONERS MEETING – 8/21/18
Public Comment Report

Public Hearing: August 21, 2018

Formal Comments Received during Public Hearing: None

BOARD OF COUNTY COMMISSIONERS MEETING – 8/21/18**Meeting Summary**

BCC JOINT MEETING REGULAR - 8/21/2018

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ATTACHMENT: [SID162A Ordinance.pdf](#)**MOVED BY: Chris Giunchigliani****ACTION: APPROVED (INCLUDING ADOPTION OF ORDINANCE NO. 4601) AS RECOMMENDED****VOTE: 6-0****VOTING AYE: Marilyn Kirkpatrick , Chris Giunchigliani , Larry Brown , Steve Sisolak , Susan Brager , Lawrence Weekly****VOTING NAY: NONE****ABSTAINING: NONE****ABSENT: Jim Gibson**

- 60** Conduct a public hearing; approve and adopt The Clark County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) for the 2015 Ozone National Ambient Air Quality Standard; and authorize the Director or her designee to incorporate any relevant public comments into the Plan and submit the Plan to the State of Nevada and the U.S. Environmental Protection Agency for review and approval as a revision to the Nevada State Implementation Plan. (For possible action)

ATTACHMENT: [Clark County Agenda Item Template.doc](#)ATTACHMENT: [20180809 DRAFT Clark County O3 ISIP.pdf](#)**MOVED BY: Chris Giunchigliani****ACTION: APPROVED AS RECOMMENDED****VOTE: 7-0****VOTING AYE: Marilyn Kirkpatrick , Chris Giunchigliani , Larry Brown , Steve Sisolak , Susan Brager , Lawrence Weekly , Jim Gibson****VOTING NAY: NONE****ABSTAINING: NONE****ABSENT: NONE**

- 61** Conduct a public hearing to review the project recommendations for the Local Law Enforcement Advisory committee (LLEAC), select projects for inclusion in the application for the FY-2018 Justice Assistance Grant (JAG) funds on behalf of the County, as fiscal agent, and the City of Las Vegas, in the amount of \$1,007,971 from the U.S. Department of Justice Programs, Bureau of Justice Assistance. (For possible action)

ATTACHMENT: [Clark County Agenda Item Template.doc](#)ATTACHMENT: [JAG 2018 LLEAC US Department of Justice.bak.pdf](#)**MOVED BY: Chris Giunchigliani****ACTION: APPROVED AS RECOMMENDED****VOTE: 7-0****VOTING AYE: Marilyn Kirkpatrick , Chris Giunchigliani , Larry Brown ,**http://clark.granicus.com/MinutesViewer.php?view_id=17&clip_id=5965&doc_id=f6e708... 8/28/2018