



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

November 18, 2011

Jared Blumenfeld
Regional Administrator
OAR-1, USEPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Revised Recommended Area Designations for the 2008 National Ambient Air Quality Standards (NAAQS) for Ozone

Jared
Dear Mr Blumenfeld:

On behalf of Governor Sandoval, as his appointed designee, I am submitting this letter to the U.S. Environmental Protection Agency (EPA) as a revision to the Nevada Division of Environmental Protection's (NDEP) March 10, 2009 recommendation letter. The March 2009 letter submitted Nevada's recommendations, pursuant to Section 107(d) of the 1990 Clean Air Act, for area designations for the 2008 ozone NAAQS. Today, we are requesting that EPA use updated monitoring data in making area designations, which would result in all counties in the State of Nevada being designated attainment/unclassifiable.

In early October, 2011, Region 9 Air Division staff indicated that States could request that the 2008 ozone area designations be based on monitoring data from 2009 to 2011, if State/Local agencies could meet an expedited deadline for entering 2011 data into EPA's Air Quality System (AQS) and completing certification of that data. As NDEP indicated by e-mail on October 3, both the Clark County Department of Air Quality and Environmental Management (DAQEM) and the Washoe County Health District Air Quality Management Division (WCAQMD) choose that option and request that EPA use 2009-2011 monitoring data for making their area designations. The NDEP will rely on the existing, certified 2008-2010 data. Nevada herein commits to having 2011 monitoring data for the Clark and Washoe Counties' jurisdictions entered into AQS and certified by February 29, 2012.

NDEP's March 2009 letter recommended that all counties in Nevada except for Clark County be designated attainment/unclassifiable. For Clark County we submitted a 9-factor analysis to reduce the nonattainment area boundaries to certain hydrographic areas within Clark County. Since Nye County was part of the Las Vegas - Paradise - Pahrump CSA, we also submitted a 9-factor analysis to exclude Nye County completely from the nonattainment area. Based on 2009-2011 data, Nevada is revising its March 2009 letter to recommend that Clark County also be designated attainment/unclassifiable for the 2008 ozone NAAQS. It follows that Nye County will, therefore, not require a 9-factor analysis for an attainment/unclassifiable designation.

Please contact Rob Bamford at (775) 687-9330 or Adele Malone of his staff (775-687-9356), if you have any questions.

Sincerely,



Colleen Cripps, Ph.D.
Administrator

- cc: Cory Hunt, Agency Liaison, Office of the Governor
Kevin Dick, Director, Washoe County Health District-AQMD
Lewis Wallenmeyer, Director, Clark County DAQEM
Amy Zimpfer, Associate Director, EPA Region IX, Air Division (AIR-1)
Gwen Yoshimura, Air Quality Analysis Office, USEPA Region IX (AIR-7)
John Kelly, Planning Office, USEPA Region IX (AIR-2)
- ec: Leo Drozdoff, Director, Nevada Department of Conservation and Natural Resources
Michael Elges, Deputy Administrator, NDEP
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