

**Second 10-Year Carbon Monoxide  
Limited Maintenance Plan**

**Las Vegas Valley Maintenance Area  
Clark County, Nevada**

**May 2019**

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## **EXECUTIVE SUMMARY**

This Limited Maintenance Plan is submitted by the Clark County Department of Air Quality for inclusion in the Nevada State Implementation Plan and will serve as the second 10-year carbon monoxide (CO) maintenance plan for the Las Vegas Valley maintenance area. It demonstrates how the Las Vegas Valley currently meets the federal 8-hour CO National Ambient Air Quality Standard and will maintain the standard through 2030.

The Las Vegas Valley was originally classified as a “moderate” nonattainment area for the 8-hour CO standard upon the enactment of the 1990 Clean Air Act Amendments (56 FR 56694). When Clark County did not attain the standard after a one-year attainment date extension, the Las Vegas Valley was reclassified as a “serious” nonattainment area. The area has been monitored in compliance with the 8-hour CO standard since 1998. On September 27, 2010, the Las Vegas Valley CO nonattainment area was redesignated to attainment when the U.S. Environmental Protection Agency’s (EPA) approved Clark County’s *Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area* (75 FR 59090). A second maintenance plan is now required and, once approved by EPA, will apply until 2030, fulfilling the maintenance planning requirements of the Act.

In accordance with EPA guidance,<sup>1</sup> the Las Vegas Valley qualifies for the use of a Limited Maintenance Plan, an option provided for areas at low risk of exceeding the CO standard. EPA will consider the maintenance demonstration satisfied if monitoring data shows the design value is at or below 7.65 parts per million, or 85 percent of the 8-hour standard. Based on the two most recent years of data (2016–2017), the current 8-hour CO design value for the Las Vegas Valley area is 2.8 parts per million, which is significantly lower than the standard.

Another requirement for using the Limited Maintenance Plan option is that the control and contingency measures from the previous maintenance plan remain in place. This plan essentially maintains existing controls and contingency provisions, and succeeds the plan EPA approved in 2010. CO levels are expected to remain well below the standard for the 10-year period ending in 2030.

In summary, this plan meets the requirements of Section 175A of the Act and conforms to EPA guidance for CO maintenance plans.

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<sup>1</sup> Paisie, J.W. 1995. “Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas.” Memorandum from Joseph W. Paisie, EPA Integrated Policy and Strategies Group, to EPA Air Branch chiefs, dated 10/6/95. Washington, D.C.: U.S. Environmental Protection Agency.

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## ACRONYMS AND ABBREVIATIONS

### Acronyms

BCC	Clark County Board of County Commissioners
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DAQ	Clark County Department of Air Quality
DMV	Nevada Department of Motor Vehicles
EPA	U.S. Environmental Protection Agency
FMVECP	Federal Motor Vehicle Emissions Control Program
FR	<i>Federal Register</i>
HA	Hydrographic Area
HAP	hazardous air pollutant
I/M	Inspection/Maintenance Program
LMP	Limited Maintenance Plan
NAAQS	National Ambient Air Quality Standards
NEI	National Emissions Inventory
RVP	Reid vapor pressure
SIP	state implementation plan
VMT	vehicle miles traveled

### Abbreviations

ppm	parts per million
psi	pounds per square inch
tpd	tons per day

## **1.0 INTRODUCTION**

The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) to protect public health for six common air pollutants, including carbon monoxide (CO). There are two federal standards for CO: an 8-hour standard of 9 parts per million (ppm) and a 1-hour standard of 35 ppm. The standard allows no more than one exceedance of either standard in each calendar year; a violation occurs when two or more exceedances are recorded at the same monitoring site in the same year. Areas with levels above the standard must develop plans to reduce CO emissions. Areas that previously violated these standards, but are now in compliance, must submit plans to assure continued attainment.

### **1.1 PURPOSE**

This Limited Maintenance Plan (LMP) shows how the Las Vegas Valley CO maintenance area will continue to attain the CO NAAQS through 2030. The Las Vegas Valley CO nonattainment area was redesignated to attainment following EPA's approval of the *Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area* (2008 CO maintenance plan) on September 27, 2010, in volume 5, page 59090 of the *Federal Register* (75 FR 59090). Section 175A of the CAA requires that areas redesignated to attainment submit a plan for maintaining the NAAQS for a second 10-year period following the expiration of the previous plan. The Clark County Department of Air Quality (DAQ) has determined the Las Vegas Valley CO maintenance area qualifies for an LMP.

### **1.2 CHARACTERISTICS OF CARBON MONOXIDE**

CO is a colorless, odorless, poisonous gas that decreases the oxygen-carrying capacity of the blood. High concentrations can severely impair the function of oxygen-dependent tissues, including the brain, heart, and other vital organs. Prolonged exposure to even low levels can aggravate existing conditions in people with heart disease or circulatory disorders.

CO is produced by the incomplete combustion of carbon-containing compounds such as wood, coal, and liquid and gaseous fuels. Its formation is enhanced when the oxygen supply is inadequate for complete oxidation of fuels to carbon dioxide. Most CO emissions are from the incomplete combustion of gasoline by motor vehicles, with peak concentrations normally occurring along roadways and near intersections with high-traffic levels. Calm winds during the late fall and winter, coupled with night and early morning ground-based temperature inversions and low precipitation, generally precipitate the buildup of CO concentrations in the Las Vegas Valley.

### **1.3 BACKGROUND**

#### **1.3.1 Designation History**

Portions of the Las Vegas Valley began violating the CO NAAQS during the winter months in the mid-1980s. The number and severity of these violations caused EPA to automatically designate the Las Vegas Valley a "moderate" nonattainment area upon enactment of the Clean Air Act Amendments of 1990 (56 FR 56694). Areas classified as "moderate" nonattainment were required

to submit state implementation plans (SIPs) demonstrating attainment of the standard by December 31, 1995. The valley was reclassified as a “serious” nonattainment area on October 2, 1997, when EPA determined the area had not attained the standard after receiving a one-year extension of the attainment date (62 FR 51604). Areas reclassified as “serious” nonattainment were required to establish measures and develop SIPs demonstrating attainment of the CO NAAQS by December 31, 2000.

In August 2000, the Clark County Board of County Commissioners (BCC) adopted Clark County’s *Carbon Monoxide State Implementation Plan: Las Vegas Valley Nonattainment Area* (2000 CO SIP). EPA formally approved the 2000 CO SIP in September 2004 (69 FR 56351). In October 2005, the BCC adopted the *Carbon Monoxide State Implementation Plan Revision: Las Vegas Valley Nonattainment Area* (2005 CO SIP revision), which updated the CO motor vehicle emissions budgets contained in the 2000 CO SIP using the latest EPA-approved model (MOBILE6.2) for transportation conformity determinations. EPA issued formal approval of the 2005 CO SIP revision in August 2006 (71 FR 44587).

In September 2008, the BCC adopted the 2008 CO maintenance plan supporting redesignation of the Las Vegas Valley CO nonattainment area to attainment. EPA approved the plan, and the Las Vegas Valley was redesignated to attainment effective September 27, 2010 (75 FR 59090). The 2008 CO maintenance plan detailed Clark County’s attainment of the CO NAAQS and the control measures in place to ensure the standard was maintained over the next 10 years (through 2020). This LMP serves as the second 10-year (through 2030) CO maintenance plan for the Las Vegas Valley CO maintenance area.

Due to the implementation of several control programs, CO concentrations in the Las Vegas Valley have improved substantially. There have been no recorded exceedances of the CO NAAQS since 1998. Details on CO trends in the Las Vegas Valley are provided in Section 2.2.1.

### **1.3.2 Las Vegas Valley Carbon Monoxide Maintenance Area**

Figure 1-1 shows the Las Vegas Valley CO maintenance area, defined as Hydrographic Area (HA) 212, which is the geographic area subject to this maintenance plan. The area encompasses approximately 1,500 square miles, largely under federal control.

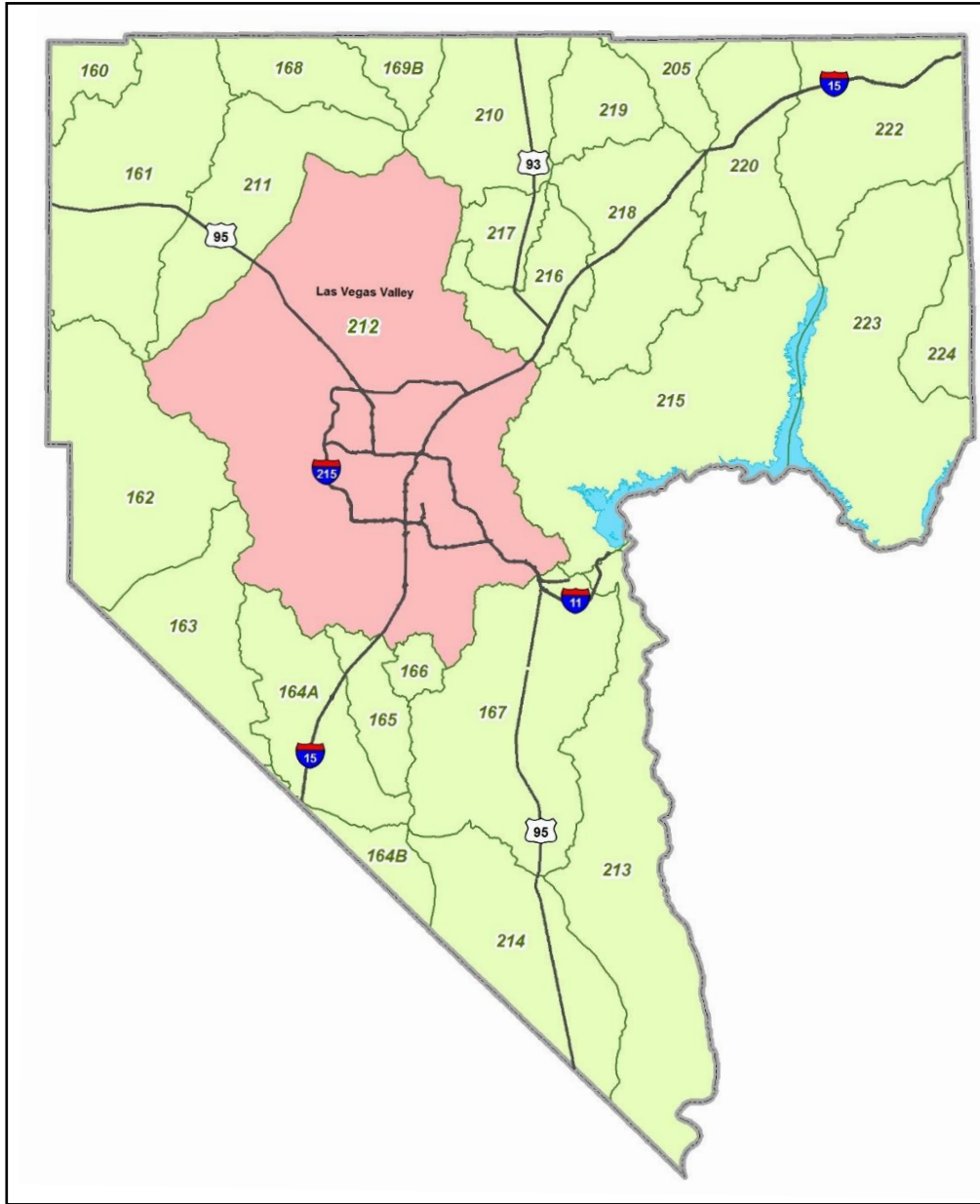


Figure 1-1. Las Vegas Valley CO Maintenance Area (HA 212).

### 1.3.3 Monitoring Network

DAQ's current CO monitoring network consists of three State and Local Air Monitoring Stations (SLAMS), all located in the Las Vegas Valley CO maintenance area. Figure 1-2 is a map of DAQ's 2017 CO monitoring network. Three of the stations shown on this map remain in operation: Jerome Mack, Sunrise Acres, and Rancho & Teddy. The J.D. Smith station was permanently shut down with EPA's approval on December 31, 2017, due to measurement challenges posed by siting obstructions. The Rancho & Teddy station is a near-road site that opened in 2015 and began monitoring CO in January 2017. It is located in a heavily trafficked area adjacent to Interstate 15. On August 7, 2017, EPA approved DAQ's proposal for a monitoring station at the Walnut



Community Center in the northeast part of the Las Vegas Valley, an area underrepresented by the existing network. This site is currently under development and will replace the J.D. Smith station, operating a CO SLAMS monitor. Appendix A contains a copy of EPA’s letter approving the J.D. Smith station closure and the proposed Walnut Community Center station.

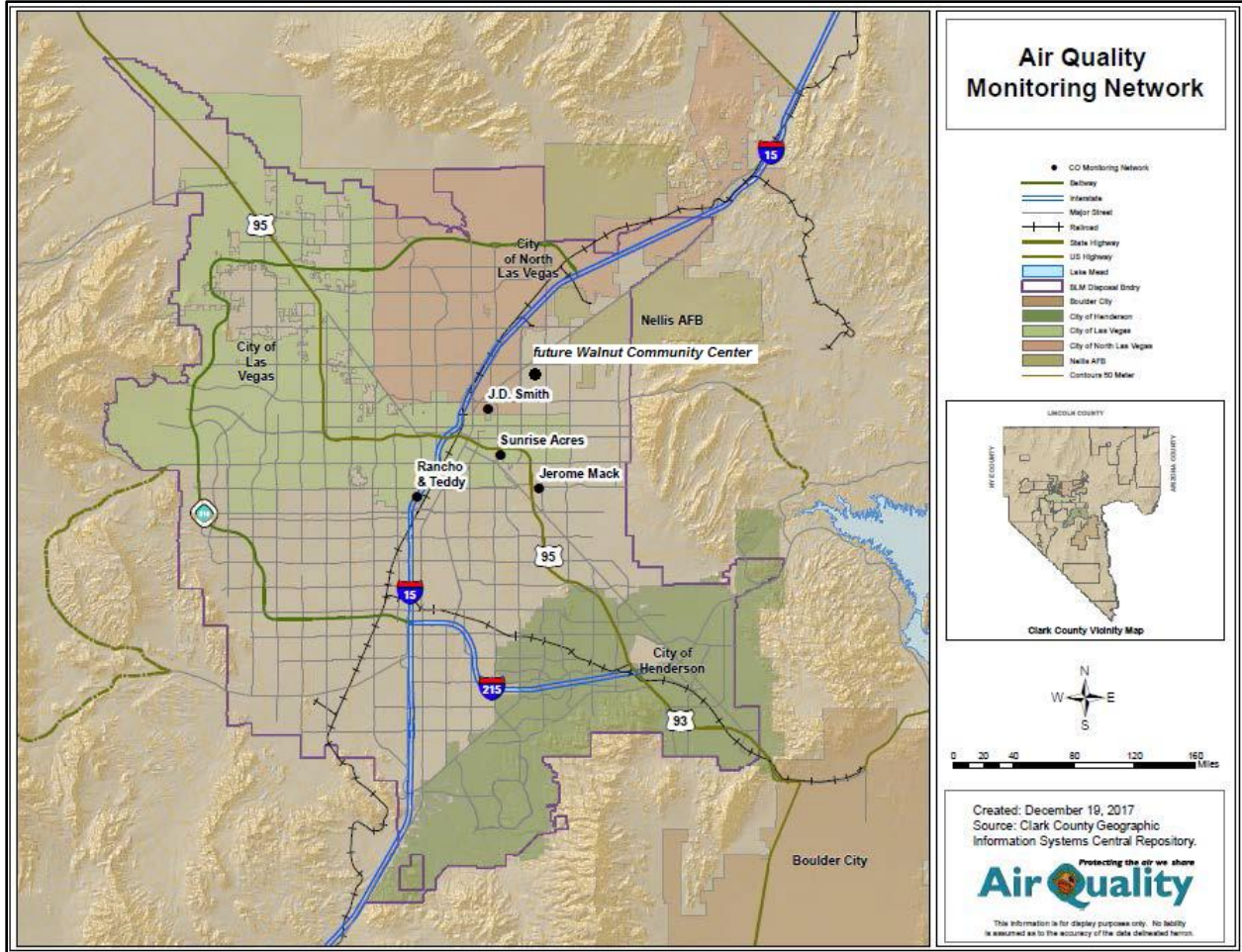


Figure 1-2. 2017 CO SLAMS Monitoring Network.

### 1.4 LIMITED MAINTENANCE PLAN OPTION

In 1995, EPA issued “Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Area” guidance,<sup>2</sup> providing areas that qualified the opportunity to use a less rigorous LMP for their second 10-year maintenance plan. This guidance requires that an area have a design value less than 85 percent of the 8-hour CO standard (7.65 ppm) to qualify for the LMP approach. The design value is based on the highest of the second highs using the two most recent years of data for all CO monitors in the maintenance area. Based on 2016–2017 monitoring data, the 8-hour CO design value for the Las Vegas Valley is 2.8 ppm. This is well below the 8-hour standard and 85 percent level, so the area is eligible for the LMP option.

<sup>2</sup> Joseph W. Paisie, “LMP Option for Nonclassifiable CO Nonattainment Areas” memo.

The LMP approach requires the development of an attainment emissions inventory for a typical winter day, but does not require projected future-year emissions inventories like a typical maintenance plan. Under an LMP, a maintenance demonstration is considered to be satisfied if monitoring data shows the area is meeting the air quality criteria for an LMP (i.e., 85 percent of the CO NAAQS). EPA believes the continued applicability of prevention of significant deterioration requirements, any control measures already contained in the SIP, and federal measures should provide adequate assurance of maintenance for such areas (Paisie 1995). Additionally, with an approved CO LMP, federal actions requiring conformity determinations under the transportation or general conformity rules could be considered to satisfy the budget test required in the respective rules. Section 3.0 addresses the required elements of an LMP.

This LMP serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area. It demonstrates how the area continues to attain the CO NAAQS and will remain in attainment of the standard through 2030.

## 2.0 DISCUSSION OF ATTAINMENT

Attainment of the CO NAAQS is demonstrated when monitoring data at each site show no more than one exceedance per year of the 8-hour (9 ppm) and 1-hour (35 ppm) standards. The Las Vegas Valley is currently a maintenance area for the CO NAAQS; it was redesignated to attainment in September 2010 based on 2008–2009 monitoring data and EPA’s approval of the 2008 CO maintenance plan (75 FR 59090). The historic and recent air quality data provided in this section demonstrate how the area continues to meet the standard.

### 2.1 HISTORIC VALUES

The Las Vegas Valley has not exceeded or violated the 8-hour CO standard since 1998, and has never exceeded the 1-hour standard. Before 1998, the valley regularly exceeded the 8-hour standard during the winter months; Figure 2-1 shows the exceedances recorded in the Las Vegas Valley between 1981 and 1998. Since that time, the magnitude of observed CO concentrations has decreased dramatically due to the implementation of several control programs. Figure 2-2 illustrates the declining trend in maximum CO concentrations between 1981 and 2017.

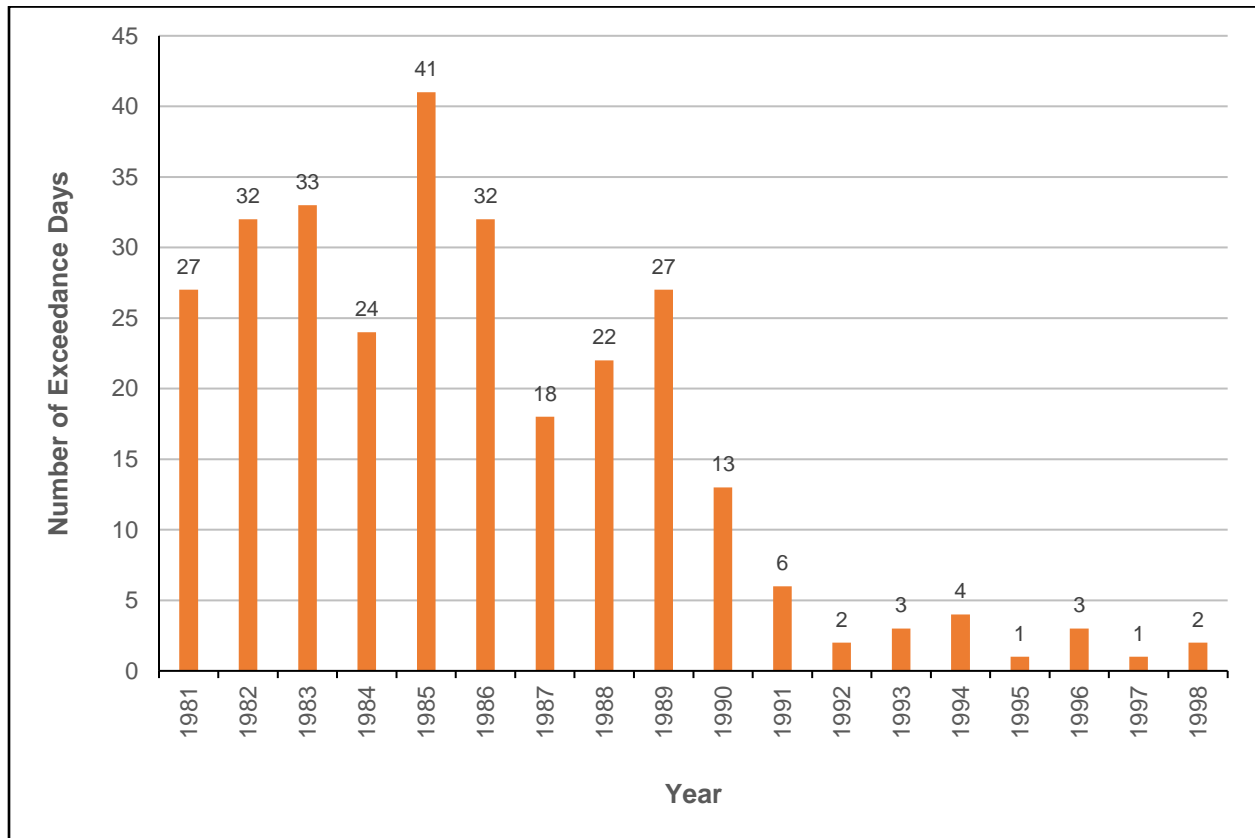


Figure 2-1. CO Exceedances in Las Vegas Valley (1981–1998).

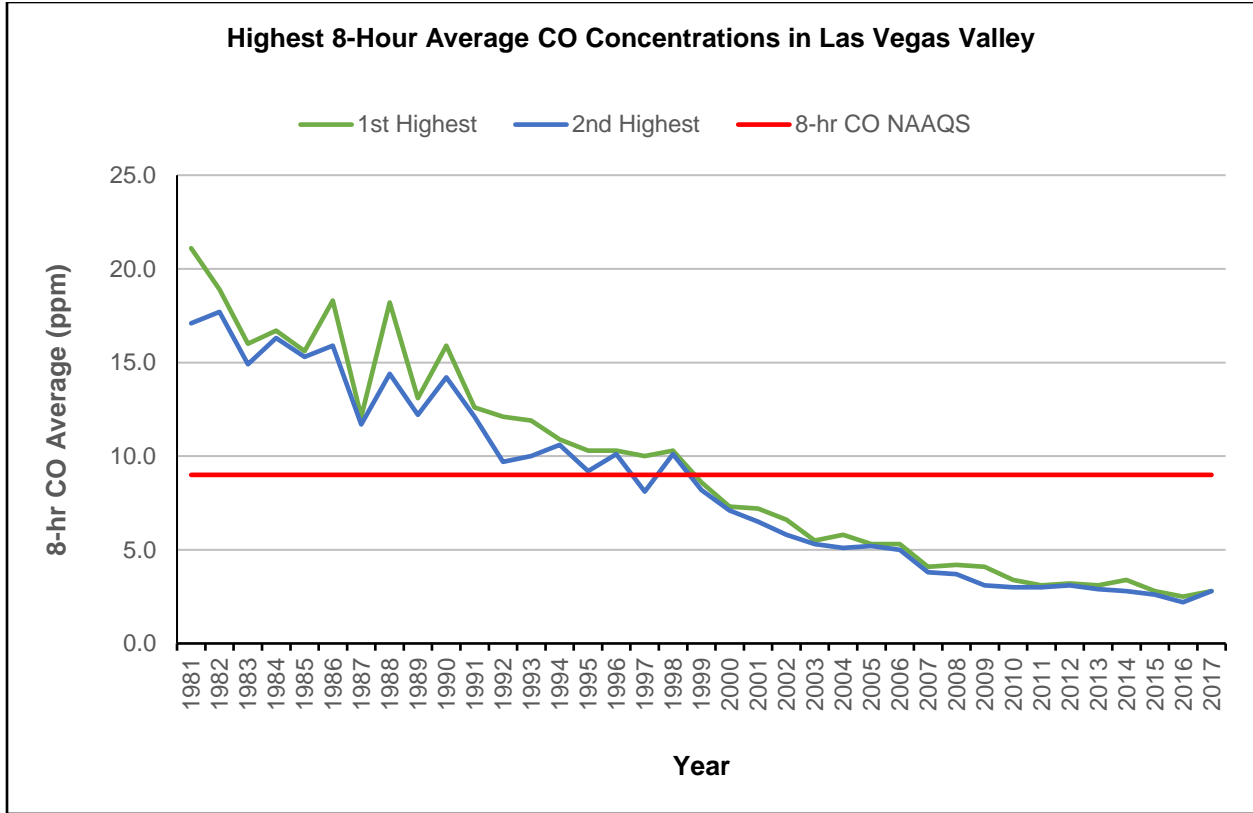


Figure 2-2. CO Air Quality Trends in Las Vegas Valley (1981–2017).

Table 2-1 contains the highest CO monitoring data for all active and inactive monitoring sites in operation from the submittal of the 2008 CO maintenance plan through 2015. All sites are located in the Las Vegas Valley CO maintenance area. As shown, monitors in the maintenance area have continued to record 1- and 8-hour maximum averages that are significantly below the CO NAAQS.

Table 2-1. Historic CO Values for the Las Vegas Valley (2008–2015)

Site Name AQS ID	Year	1-hour		8-hour	
		1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)	1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)
Winterwood <sup>1</sup> 32-003-0538	2008	3.8	3.8	2.9	2.9
	2009	3.8	3.7	3.0	2.8
	2010	3.0	2.9	2.6	2.5
	2011	3.4	2.9	2.4	2.4
	2012	3.0	2.9	2.5	2.2
	2013	3.2	3.1	2.8	2.4
	2014	3.1	3.1	2.9	2.4
East Sahara <sup>2</sup> 32-003-0539	2008	5.1	4.7	4.2	3.7
	2009	4.5	4.2	4.0	3.1
	2010	3.7	3.6	3.4	3.0

Site Name AQS ID	Year	1-hour		8-hour	
		1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)	1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)
Jerome Mack 32-003-0540	2011	3.2	3.1	2.6	2.6
	2012	3.2	3.2	2.8	2.8
	2013	3.6	3.5	3.1	2.5
	2014	3.8	3.3	3.3	2.7
	2015	2.6	2.5	2.4	2.3
Sunrise Acres 32-003-0561	2008	4.2	4.2	3.6	3.5
	2009	5.2	4.7	4.1	2.8
	2010	3.8	3.6	3.0	3.0
	2011	3.7	3.5	3.1	3.0
	2012	3.6	3.6	3.2	3.1
	2013	4.0	4.0	3.1	2.9
	2014	4.4	3.7	3.4	2.8
	2015	3.4	3.2	2.8	2.6
ORR <sup>3</sup> 32-003-1021	2008	3.2	3.2	2.6	2.6
	2009	3.4	3.2	2.8	2.6
	2010	3.2	3.0	2.7	2.7
J.D. Smith 32-003-2002	2008	4.2	3.6	2.5	2.5
	2009	3.3	3.2	2.4	2.4
	2010	3.0	3.0	2.3	2.3
	2011	2.9	2.9	2.4	1.9
	2012	3.1	3.0	2.1	2.1
	2013	3.3	3.0	2.4	2.4
	2014	3.2	3.2	2.7	2.2
	2015	3.0	2.6	1.8	1.8

Source: EPA's Air Quality System (AQS). Retrieved from <https://www.epa.gov/aqs>

<sup>1</sup> Site was shut down in October 2014.

<sup>2</sup> Site was shut down in April 2010.

<sup>3</sup> Site was shut down in April 2010.

## 2.2 RECENT AIR QUALITY VALUES

Table 2-2 shows the most recent CO monitoring data for all active and inactive monitoring sites in operation during 2016–2017. All sites are located in the Las Vegas Valley CO maintenance area. See Section 1.3.3 for more information on DAQ’s current CO monitoring network.

**Table 2-2. Current CO Values for Las Vegas Valley (2016–2017)**

Site Name AQS ID	Year	1-hour		8-hour	
		1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)	1 <sup>st</sup> Max (ppm)	2 <sup>nd</sup> Max (ppm)
Jerome Mack 32-003-0540	2016	2.7	2.6	2.2	2.2
	2017	2.9	2.9	2.5	2.5
Sunrise Acres 32-003-0561	2016	3.0	2.9	2.5	2.2
	2017	3.5	3.2	2.8	2.8
J.D. Smith <sup>1</sup> 32-003-2002	2016	3.1	2.9	2.3	2.0
	2017	2.8	2.5	2.1	1.9
Rancho & Teddy <sup>2</sup> 32-003-1501	2017	1.9	1.8	1.5	1.5

Source: EPA’s Air Quality System. Retrieved from <https://www.epa.gov/aqs>

<sup>1</sup> Site was shut down in December 2017.

<sup>2</sup> Site began monitoring CO in January 2017.

### 2.2.1 Design Value

Methods for determining an area’s CO design value are outlined in EPA’s “Ozone and Carbon Monoxide Design Value Calculations” guidance.<sup>3</sup> The design value is the highest of the second maximum 8-hour concentrations observed at any site in the area using the two most recent years of data. Based on the 2016–2017 monitoring data in Table 2-2, the Las Vegas Valley’s current 8-hour average CO design value is 2.8 ppm, well below the 8-hour NAAQS of 9 ppm and the CO LMP eligibility threshold of 7.65 ppm (85 percent of the CO NAAQS). Figure 2-3 illustrates the declining trend in CO design values in the Las Vegas Valley between 2000 and 2017.

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<sup>3</sup> Laxton, W.G. 1990. “Ozone and Carbon Monoxide Design Value Calculations.” Memorandum from William G. Laxton, Technical Support Division, dated 6/18/90. Washington, D.C.: U.S. Environmental Protection Agency.

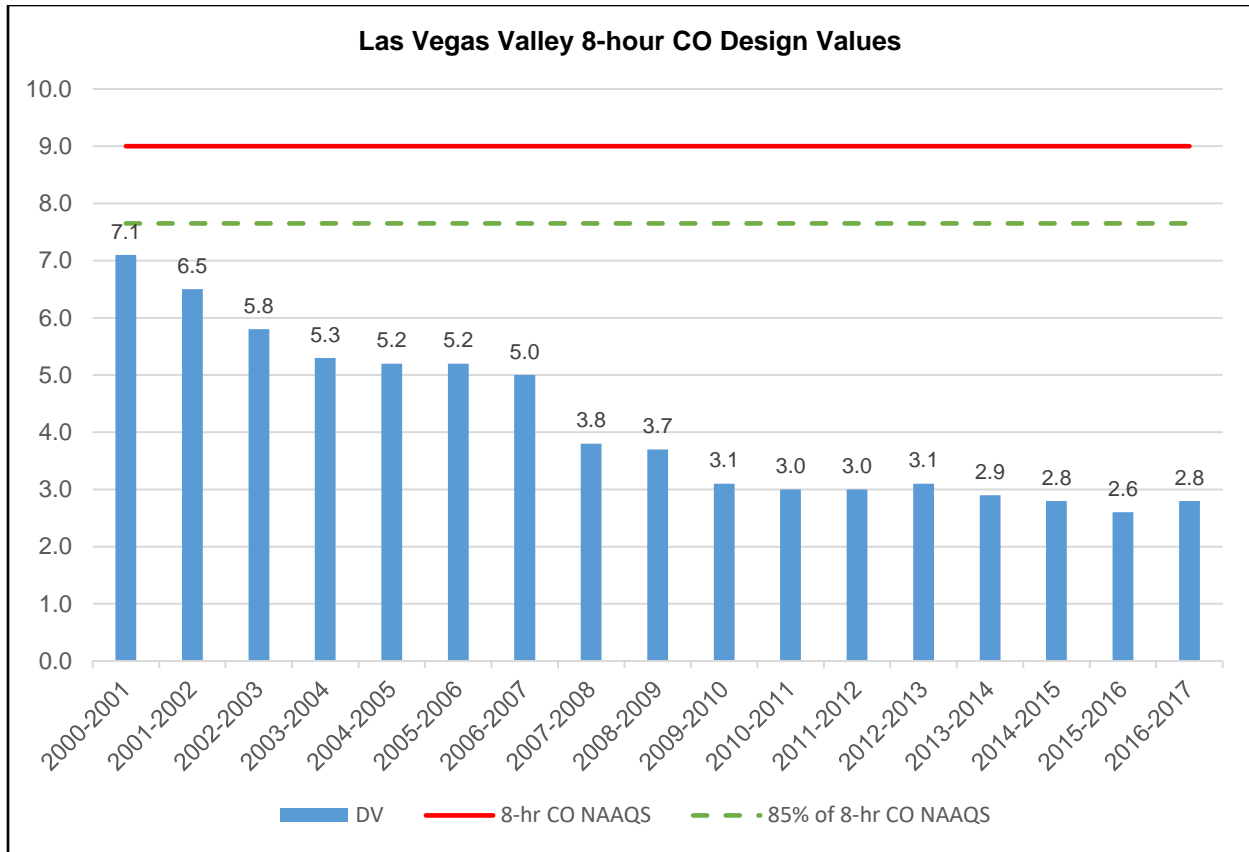


Figure 2-3. CO Design Value Trends for Las Vegas Valley (2000–2017).

### 3.0 LIMITED MAINTENANCE PLAN

This plan addresses the following core provisions required in an LMP, and outlines the regulatory and control measures in place to ensure continued compliance with the CO NAAQS over the second 10-year period (through 2030):

- Attainment Inventory
- Maintenance Demonstration
- Monitoring Network/Verification of Continued Attainment
- Contingency Plan
- Conformity Determinations

#### 3.1 ATTAINMENT INVENTORY

The LMP should contain an attainment emissions inventory that identifies a level of CO emissions in the area that is sufficient to attain the CO NAAQS, and should represent “typical winter day” CO emissions for the time period associated with the monitoring data showing attainment (Paisie 1995). This inventory contains estimates of how much CO is emitted by all source categories in the area. Under the LMP option, there is no requirement to project emissions over the maintenance period.

##### 3.1.1 Emission Inventory Type Categories

The inventories for CO emissions were derived from estimates developed for the following source categories: point, nonpoint, aviation, onroad mobile, and nonroad mobile. The following sections provide a brief description of each source category and the methodologies and emission factors used to calculate their estimated emissions.

###### 3.1.1.1 Point Sources

Point sources are industrial, commercial, or institutional stationary sources that emit criteria and/or hazardous air pollutants (HAP). Major point sources have the potential to emit 100 tons per year or more of any criteria pollutant and/or have the potential to emit 10 tons per year or more of any single HAP or 25 tons or more of a combination of HAPs. For this inventory, DAQ has included all facilities in the Clark County Title V operating permit program that are located in the Las Vegas Valley CO maintenance area (HA 212). DAQ staff reviewed the 2017 emissions reported by each facility for quality assurance purposes. Emissions estimates for each facility were calculated using a variety of emission estimation methods, including continuous emission monitors, stack test data, mass balance, manufacturer’s specifications, or EPA emission factors.

These point sources are also required to provide monthly or quarterly throughput data in their semiannual compliance reports. When available, this throughput data was used to allocate emissions for the CO season (December, January, and February). Seasonal emissions were then divided by the three months (90 days) representing the CO season to obtain tons per day (tpd) emissions. Table 3-1 shows estimated CO emissions for point sources in HA 212 in 2017.



**Table 3-1. 2017 HA 212 Point Source CO Emission Estimates**

Facility ID	Facility Name	Annual 2017 Emissions (tons)	CO Season Allocation (%)	CO Season Emissions (tpd)
00004	Certainteed Gypsum Manufacturing	49.13	25	0.14
00007	Clark Generating Station	66.86	1	0.01
00013	Calnev Pipe Line LLC	0.14	25	<0.01
00019	Titanium Metals Corporation	57.59	25	0.16
00095	EMD Acquisition LLC	38.30	24	0.10
00114	Nellis Air Force Base	11.42	25	0.03
00257	Caesars Consolidated Properties	16.15	25	0.04
00329	Las Vegas Generating Station	8.06	25	0.02
00372	Aggregate Industries Sloan Quarry	19.29	24	0.05
00393	Saguaro Power Company	15.91	26	0.05
00423	Sun Peak Generating Station	6.11	2	<0.01
00825	MGM Resorts International	75.94	25	0.21
15033	Sunrise Municipal Solid Waste Landfill	21.33	28	0.07
16304	Switch LTD	4.34	25	0.01
17286	Blue Diamond Hill Gypsum	17.51	23	0.04
<b>Total:</b>		<b>408.08</b>		<b>0.93</b>

*3.1.1.2 Nonpoint Sources*

Nonpoint sources are stationary sources that are too small or numerous to be treated as individual point sources. These generally consist of commercial, small-scale industrial, and residential operations whose emissions fall below point source reporting levels. According to EPA, the 2017 National Emissions Inventory (NEI) for nonpoint sources will not be available until early 2020. DAQ therefore used nonpoint data from EPA’s 2016 modeling platform (alpha version) as a surrogate for 2017. The department believes the differences between 2016 and 2017 are insignificant, considering the uncertainties in the emission estimates. DAQ ran the Sparse Matrix Operator Kernel Emissions (SMOKE) model using nonpoint data in three different sectors: residential wood combustion, railroad, and other stationary nonpoint sources. For practical purposes, DAQ ran the SMOKE model for the month of January to represent typical wintertime weekday CO emissions. Table 3-2 shows the average wintertime weekday CO emission estimates from nonpoint sectors in Clark County for 2017.

**Table 3-2. 2017 Clark County Wintertime Nonpoint Source CO Emission Estimates**

Nonpoint Sources	CO Emissions (tpd)
Residential wood combustion	34.93
Railroad	0.27
Other nonpoint sources	8.28
<b>Total:</b>	<b>43.48</b>

**3.1.1.3 Aviation**

McCarran International Airport, Henderson Executive Airport, and North Las Vegas Airport are the three commercial airports located in HA 212. DAQ also included the military airport (Nellis Air Force Base) in the CO emissions inventory. 2014 CO emissions for the airports in HA 212 were obtained from NEI data. Airport operations data for 2014 and 2017 were obtained from the Federal Aviation Administration’s Air Traffic Activity System and Terminal Area Forecast databases. The difference in airport operations between 2014 and 2017 was expressed as a ratio, which was then multiplied by the 2014 NEI to estimate annual CO emissions for 2017. Assuming a flat temporal profile, these annual emissions were divided by 365 days to obtain the average CO season emissions in tpd. Table 3-3 shows estimated CO emissions for the aviation sector in HA 212 in 2017.

**Table 3-3. 2017 HA 212 Aviation CO Emission Estimates**

Airport Name	Annual 2017 CO Emissions (tons)	CO Season Emissions (tpd)
Henderson Executive Airport	207.59	0.57
McCarran International Airport	3633.03	9.95
Nellis Air Force Base	210.45	0.58
North Las Vegas Airport	523.50	1.43
<b>Total:</b>	<b>4574.57</b>	<b>12.53</b>

**3.1.1.4 Onroad Mobile Sources**

DAQ has developed onroad mobile source emissions estimates for 2017 using MOVES2014b, the latest release of EPA’s MOVES model. Onroad mobile sources from MOVES include emissions from the 13 source types listed in Table 3-4.

**Table 3-4. MOVES Source Use Type**

Source Type ID	MOVES Source Type Name
11	Motorcycle
21	Passenger Car
31	Passenger Truck
32	Light Commercial Truck
41	Intercity Bus
42	Transit Bus
43	School Bus
51	Refuse Truck
52	Single Unit Short-haul Truck
53	Single Unit Long-haul Truck
54	Motor Home
61	Combination Short-haul Truck
62	Combination Long-haul Truck

#### *3.1.1.4.1 MOVES Inputs*

DAQ developed county-specific MOVES input data for 2017 using the latest information. The MOVES County Database for Clark County was generated for 2017 and submitted to EPA on January 15, 2019, as part of the Air Emissions Reporting Requirements process.

The key MOVES inputs include vehicle activity data, fleet age distribution, fuel parameters, and inspection and maintenance (I/M) programs. DAQ conducted a vehicle classification study, completed in June 2018, that used 2014–2016 traffic count data collected by the Nevada Department of Transportation and included an onroad license plate survey at selected roadway locations. The collected license plate numbers were matched to vehicle identification numbers and decoded to obtain vehicle attributes that allowed DAQ’s contractor to differentiate between cars and light-duty trucks. The primary products of the vehicle classification study were a vehicle miles traveled (VMT) mix and temporal profiles, which were incorporated into the 2017 MOVES input database.

The Nevada Department of Motor Vehicles (DMV) provided DAQ with the vehicle registration data for Clark County by model year and vehicle type, which were used to generate vehicle population and vehicle age distribution inputs. The age distributions for 2017 were based on the vehicle registration data from DMV for light-duty vehicle types, while age distributions for heavy-duty vehicle types were exported from MOVES2014b’s default database. However, a better source of data for age distribution is the vehicle identification number decoding of 2017 registration data, which is currently under development by EPA and will be used in the 2016 modeling platform.

Vehicle speed distribution is a crucial component for onroad emission inventories, and the Coordinated Research Council has sponsored a number of projects aimed at improving the onroad portion of the NEI. For the Clark County 2017 MOVES database, average vehicle speed distributions by 16 MOVES speed bins for each vehicle type were based on council-sponsored Project A-100, which used StreetLight Vehicle Telematics Data.

Activity data for each vehicle type, such as VMT and vehicle population, are required inputs for MOVES. The VMT data used for 2017 were derived from the Nevada Department of Transportation’s annual Highway Performance Monitoring System reports for 2017. The MOVES model requires annual or daily VMT by vehicle type. Using the VMT mix information developed from the Clark County Vehicle Classification Study mentioned earlier, DAQ generated annual VMT for each vehicle or source type. Table 3-5 shows annual VMT by source type for 2017.

**Table 3-5. 2017 Clark County Annual VMT by Vehicle Type**

Source Type ID	Source Type Name	Annual VMT
11	Motorcycle	106,386,954
21	Passenger car	9,208,010,383
31	Passenger truck	7,407,161,693
32	Light commercial truck	792,674,327
41	Intercity bus	58,489,698
42	Transit bus	28,032,592
43	School bus	23,000,000
51	Refuse truck	14,183,328
52	Single unit short-haul truck	229,675,451
53	Single unit long-haul truck	20,871,686
54	Motor home	1,933,403
61	Combination short-haul truck	170,417,334
62	Combination long-haul truck	252,543,847
<b>Total:</b>		<b>18,313,380,695</b>

The vehicle type population data were primarily derived from DMV’s vehicle registration database. Adjustments were made based on further data obtained from the Regional Transportation Commission of Southern Nevada for transit buses and local refuse haulers. The school bus populations were based on reports from the online magazine *School Bus Fleet* ([www.schoolbusfleet.com](http://www.schoolbusfleet.com)). Vehicle population estimates for combination short-haul and long-haul trucks were based on the MOVES default database. Table 3-6 shows the Clark County vehicle population data used in the MOVES modeling effort.

**Table 3-6. 2017 Clark County Vehicle Population**

Source Type ID	Source Type Name	Vehicle Population
11	Motorcycle	42,492
21	Passenger car	714,907
31	Passenger truck	557,168
32	Light commercial truck	59,625
41	Intercity bus	374
42	Transit bus	797
43	School bus	1,957
51	Refuse truck	632
52	Single unit short-haul truck	16,395
53	Single unit long-haul truck	1,160
54	Motor home	910
61	Combination short-haul truck	5,660
62	Combination long-haul truck	6,336
<b>Total:</b>		<b>1,408,413</b>

Information regarding vehicle I/M programs is another important input for the MOVES model. In the Las Vegas Valley, the state I/M program requires an annual two-speed idle test for 1995 and

older vehicles and onboard diagnostics checks (exhaust and evaporative) for 1996 and newer vehicles. This information was incorporated into MOVES modeling. Since classic vehicles in Clark County can be exempted from I/M tests, the DMV’s classic vehicle data were also factored into the Clark County MOVES database. The fuel parameters from the MOVES2014b default database for Clark County were used.

*3.1.1.4.2 Onroad Mobile Emission Estimates*

Table 3-7 shows the average weekday CO emissions estimates in Clark County in 2017 by MOVES source type. These CO emissions are January weekday averages; for practical purposes, DAQ ran MOVES2014b only for the month of January to represent typical wintertime weekday onroad CO emissions. As shown, the highest CO emission is from the Passenger Truck category, followed by the Passenger Car category. Total estimated CO emissions from onroad mobile sources are 278.18 tpd.

**Table 3-7. 2017 Clark County Wintertime Weekday Onroad CO Emission Estimates**

<b>Source Type ID</b>	<b>Source Type Name</b>	<b>CO Emissions (tpd)</b>
11	Motorcycle	4.386
21	Passenger car	94.526
31	Passenger truck	149.620
32	Light commercial truck	17.164
41	Intercity bus	0.554
42	Transit bus	0.459
43	School bus	0.442
51	Refuse truck	0.122
52	Single unit short-haul truck	6.497
53	Single unit long-haul truck	0.300
54	Motor home	0.162
61	Combination short-haul truck	0.876
62	Combination long-haul truck	3.070
<b>Total:</b>		<b>278.18</b>

*3.1.1.5 Nonroad Mobile Sources*

Nonroad mobile equipment encompasses a wide variety of equipment types that either move under their own power or are capable of being moved from site to site. DAQ generated nonroad mobile emission inventories for 2017 using the nonroad module of the latest MOVES model, MOVES2014b, which was released in August 2018. MOVES2014b improves on nonroad engine population growth rates, nonroad Tier 4 engine emissions rates, and the sulfur levels of nonroad diesel fuels.

The nonroad module of MOVES includes both emission factors and default county-level population and activity data. The model estimates emissions and can be post-processed to generate emission factors. It includes more than 80 basic and 260 specific types of nonroad equipment, but does not include commercial marine, and aircraft emissions. The model does, however, estimate

emissions from railroad yard maintenance equipment. Equipment information is arranged into the following categories or sectors:

- Recreational vehicles, such as all-terrain vehicles and off-road motorcycles
- Construction equipment, such as graders and backhoes
- Industrial equipment, such as forklifts and sweepers
- Residential and commercial lawn and garden equipment, such as leaf and snow blowers
- Agricultural equipment, such as tractors, combines, and balers
- Commercial equipment
- Logging equipment, such as shredders and large chain saws
- Airport ground support, such as terminal tractors
- Underground mining equipment
- Oil field equipment
- Pleasure craft, such as power boats
- Railroad yards

MOVES incorporates default estimates, variables, and factors for use in calculations. All data are stored in MySQL database tables, and can be changed if data more appropriate to the local area are available. Due to limited time and resources, DAQ used MOVES2014b's default input database to estimate nonroad CO emissions in 2017.

Table 3-8 shows MOVES2014b CO emissions estimates for Clark County by sector. Emissions from the Airport Ground Support sector were zeroed out, since they were estimated as part of the airport emission inventories. The emissions from the Oil Field and Pleasure Craft sectors were also zeroed out because these source activities occur outside the Clark County CO nonattainment area (HA 212). DAQ ran MOVES2014b for the month of January to represent wintertime nonroad emissions.

**Table 3-8. 2017 Clark County Wintertime Nonroad CO Emission Estimates**

<b>Sector Name</b>	<b>CO (tpd)</b>
Recreational	2.379
Construction	42.695
Industrial	1.662
Lawn/garden	43.768
Agriculture	0.006
Commercial	23.305
Logging	0
Airport support	0
Underground mining	0
Oil field	0
Pleasure craft	0
Railroad	0.025
<b>Total:</b>	<b>113.84</b>

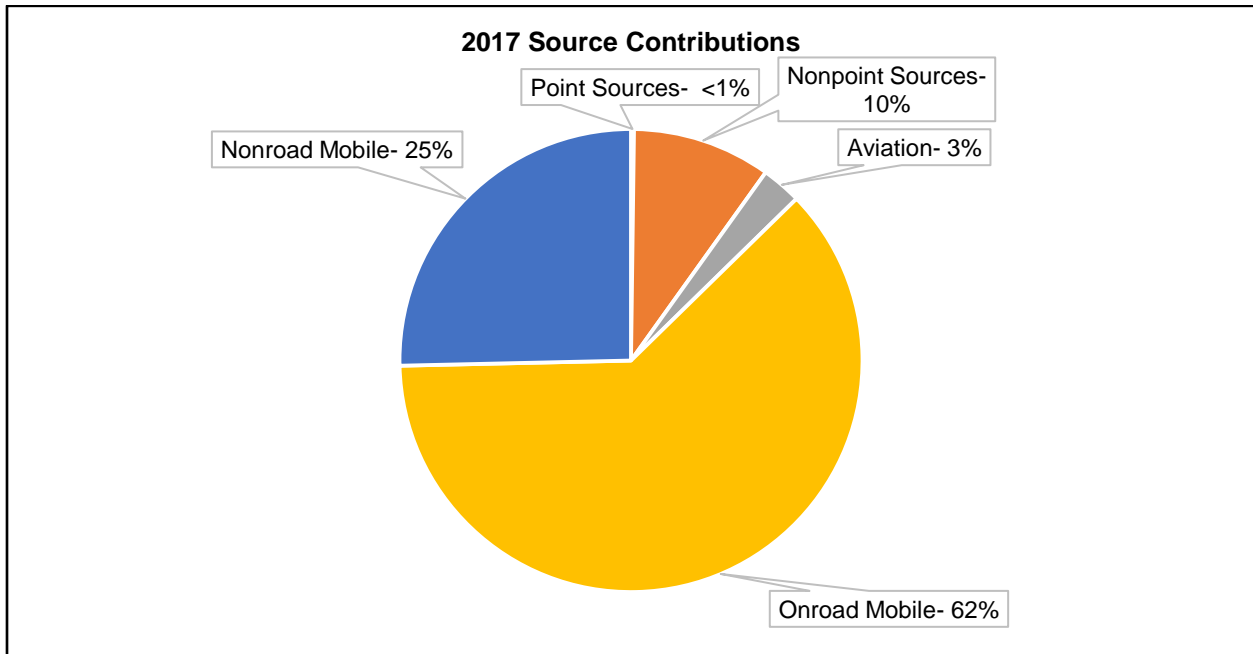
### 3.1.2 Summary of Emission Inventories

Table 3-9 summarizes the estimated tons of CO emitted in Clark County per winter day in 2017 by source category. Due to limitations in modeling, and because a majority of the population resides and travels within HA 212, estimated emissions for nonpoint, onroad mobile, and nonroad mobile sources include Clark County in its entirety, as opposed to just the Las Vegas Valley CO maintenance area. This is a more conservative approach that likely over projects CO emissions within the maintenance area itself, but provides an adequate representation of CO emissions for these source categories. All emission inventory estimates represent a typical weekday during the wintertime season (December through February).

**Table 3-9. Summary of 2017 Average Winter Weekday CO Emissions**

Source Category	CO (tpd)
Point	0.93
Nonpoint	43.48
Aviation	12.53
Onroad mobile	278.18
Nonroad mobile	114.35
<b>Total:</b>	<b>448.96</b>

Figure 3-1 illustrates the contributions emission sources make to daily winter CO emissions. It shows that mobile sources are the leading contributor of wintertime CO emissions, with onroad sources representing 62 percent of total CO emissions and nonroad sources representing 25 percent.



**Figure 3-1. 2017 Winter CO Emission Sources.**

## 3.2 MAINTENANCE DEMONSTRATION

Under the LMP option, the maintenance demonstration requirement is considered to be satisfied if monitoring data show that an area is meeting the air quality criteria for limited maintenance areas (i.e., a design value at or below 7.65 ppm, or 85 percent of the CO NAAQS) and the area continues to meet this level through the effective date of plan approval (Paisie 1995). Further, EPA believes the continued applicability of prevention of significant deterioration requirements, any control measures already in the SIP, and federal measures should provide adequate assurance of maintenance over the 10-year maintenance period (Paisie 1995). The following sections describe how DAQ satisfies these requirements.

### 3.2.1 Air Quality Criteria

As described in Section 2.2.1, the Las Vegas Valley CO maintenance area has a current 8-hour CO design value of 2.8 ppm, which is substantially lower than the 7.65 ppm air quality criteria value required for an LMP. The area has remained well below the 85 percent LMP threshold since 2007, with design values under 50 percent of the NAAQS.

### 3.2.2 Control Measures

The following permanent and enforceable emission reduction control measures identified in the 2008 CO maintenance plan will continue into the second 10-year maintenance period: Federal Motor Vehicle Emissions Control Program (FMVECP), State Vehicle I/M Program, Oxygenated Gasoline Program, and State Technician Training and Certification Program. These measures have contributed to bringing the Las Vegas Valley into attainment of the CO NAAQS and will help keep the area in attainment of the standard through the 2030 maintenance year.

#### 3.2.2.1 Federal Motor Vehicle Emissions Control Program

DAQ will continue to rely on the FMVECP as a primary control measure for maintaining the CO NAAQS. This program has dramatically reduced CO emissions by continually requiring manufacturers to produce new vehicles that meet increasingly tighter emission standards. Requirements include emission standards for new light- and medium-duty cars and trucks, as well as standards for heavy-duty onroad and nonroad vehicles. Emission reductions mandated by the FMVECP have been primarily responsible for the large decrease in CO concentrations in the Las Vegas Valley. As newer, cleaner vehicles replace older, dirtier ones, these standards will have an increasing role in reducing CO emissions.

#### 3.2.2.2 State Vehicle Inspection/Maintenance Program

DAQ will continue to rely on the State's I/M program as a primary control measure for maintaining the CO NAAQS. Emission reductions since the program's inception have been central to decreasing CO concentrations in the Las Vegas Valley. The program is governed under the provisions of Chapter 445B of the Nevada Revised Statutes and Nevada Administrative Code. Adopted in 1978 and administered by the DMV, these regulations establish annual testing procedures for 1968 or newer gasoline-powered vehicles, regardless of size, and for diesel-



powered vehicles with a manufacturer's gross vehicle weight rating of up to 14,000 pounds. On-board diagnostic testing procedures are used for 1996 and newer vehicles, while older vehicles are tested with a two-speed idle test. The program includes waiver provisions for motorists who spend \$450 on emission-related repairs. No waivers are allowed for vehicles that emit visible smoke.

The I/M program also allows exemptions from emissions testing for new vehicles on their first and second registration; new hybrid-electric vehicles for the first five model years; alternative fuel vehicles; vehicles registered as Classic Rods, Classic Vehicles, or Old Timer and driven 5,000 miles or less per year; and vehicles registered as Replica Vehicles.

### *3.2.2.3 Oxygenated Gasoline Program*

DAQ will continue to rely on its Oxygenated Gasoline Program as a primary control measure for maintaining the CO NAAQS. This program, implemented under Section 53 of the Clark County Air Quality Regulations, requires that all fuel during the winter season (October 1 to March 31) contain 3.5 percent oxygenate by weight. The area of applicability includes the hydrographic areas containing the Las Vegas, Eldorado, and Ivanpah valleys; the Boulder City limits; and any area within three miles of these hydrographic areas that is within Clark County.

The use of oxygenated gasoline was originally mandated under the 1990 CAA amendments, which required gasoline sold in areas that did not meet the CO NAAQS to contain 2.7 percent oxygen content by weight. Clark County's program is considerably more stringent than that minimum: 3.5 percent oxygen content by weight or 10 percent by volume. Ethanol is the principal oxygenate used in Clark County.

### *3.2.2.4 State Technician Training and Certification Program*

DAQ will continue to rely on the State's Technician Training and Certification Program as a primary control measure for maintaining the CO NAAQS. 40 CFR Part 51.367 requires that state I/M inspectors be trained and certified; Chapter 445B of the Nevada Revised Statutes and Nevada Administrative Code set forth the state regulations governing technician training and certification. The DMV is responsible for administering these regulations.

The general requirements to become a class 1 approved inspector include submittal of a certificate of competence from an exhaust gas analyzer manufacturer; successful completion of a training course and written exam; and a practical demonstration of the procedures for testing motor vehicles prescribed by the DMV. Requirements for becoming a class 2 approved inspector include establishment of proper qualifications; demonstration of the ability to test motor vehicles and to diagnose, repair, and service a device for controlling exhaust emissions; successful completion of a written test; and submittal of a current certification from the National Institute for Automotive Service Excellence as an advanced engine performance specialist.

### **3.3 MONITORING NETWORK/VERIFICATION OF CONTINUED ATTAINMENT**

To verify the attainment status of an area over the maintenance period, an LMP should contain provisions for the continued operation of an appropriate, EPA-approved air quality monitoring network, in accordance with 40 CFR Part 58 (Paisie 1995).

DAQ commits to continue operating an air quality monitoring network in accordance with 40 CFR Part 58 to verify continued attainment of the CO NAAQS. With monitoring data used as the triggering mechanism, DAQ will continue to track CO concentrations and verify continued attainment via the approved monitoring network operated in accordance with 40 CFR Part 58. Additionally, if measured mobile source parameters (e.g., VMT or fleet mix) change over time, DAQ will conduct studies to determine whether additional or re-sited monitors are necessary. The air quality monitoring network will be reviewed annually in accordance with 40 CFR Part 58.10 to determine whether the network continues to meet the monitoring objectives in 40 CFR Part 58, Appendix D. Any monitor shutdowns or relocations will be made with EPA approval. See Section 1.3.3 for details on DAQ's current CO monitoring network.

### **3.4 CONTINGENCY PLAN**

Section 175A(d) of the CAA requires that a maintenance plan include contingency provisions to assure prompt correction of any violation of the CO NAAQS after redesignation. According to EPA guidance, the contingency plan does not need to contain fully adopted contingency measures; however, it is considered an enforceable part of the SIP and should ensure contingency measures are adopted expeditiously once they are triggered by a specified event (Paisie 1995). LMP guidance requires that the contingency plan address the following elements: (1) measures to be adopted; (2) tracking and triggering mechanisms to determine when contingency measures are needed; and (3) a schedule and procedure for implementing these measures.

#### **3.4.1 Contingency Measures**

For this LMP, DAQ is retaining the Reduced Reid Vapor Pressure (RVP) Gasoline Program contingency measure from its 2008 CO maintenance plan.

##### ***3.4.1.1 Reduced Reid Vapor Pressure Gasoline Program***

As part of the 2008 CO maintenance plan, DAQ proposed relaxing the RVP for wintertime fuels sold in Clark County (October 1 through March 31) from 9 pounds per square inch (psi) to 13.5 psi to coincide with the specification guides contained in Standard D4814-01a, Volume 05.02, of the *2002 Annual Book of ASTM Standards* (ASTM 2006). Relaxation of the RVP for wintertime fuels has a positive impact on gasoline supplies to the Las Vegas Valley because it no longer precludes the distribution and sale of conventional and reformulated gasoline, which is sold throughout the rest of the southwestern United States during the winter season.

EPA approved this request (75 FR 59091) based on its finding that relaxation of the RVP standard would not interfere with continued maintenance of the CO standard and the Nevada Department of Agriculture's commitment to seek reinstatement of the Low RVP Rule (Section 590.065 of the

Nevada Administrative Code) if called upon to do so. DAQ will seek reinstatement and tightening of the RVP standard back to 9.0 psi as a contingency measure if future CO exceedances occur.

### **3.4.2 Triggering Mechanisms and Implementation Schedule**

DAQ's primary tracking mechanism is continuous monitoring of CO levels through its CO monitoring network (Section 1.3.3). The department will continue to maintain CO monitors in accordance with 40 CFR Part 58. To ensure that future violations of the CO NAAQS do not occur, ambient air quality monitoring data will be examined to determine if additional contingency measures are needed. A NAAQS violation occurs when the second highest reading at the same monitoring site over two consecutive years is greater than or equal to 9.5 ppm. Any verified exceedance over 9 ppm during the CO season (October 1 through March 31) will trigger an automatic review to determine which contingency measure(s) should be adopted if another exceedance occurs at the same monitor.

DAQ must review and verify monitoring data within three months of an exceedance and recommend contingency measures within six months. DAQ may recommend local, voluntary measures to prevent a second exceedance; however, action would not be mandated. The only federally enforceable trigger for mandatory implementation of contingency measures is a violation of the 8-hour CO NAAQS.

If a second exceedance occurs at the same monitoring site within a consecutive two-year period, DAQ will recommend contingency measures to the BCC. If the contingency measures described in Section 3.4.1 are not adequate to prevent future exceedances, DAQ will recommend more stringent contingency measures and/or additional CO reduction measures. Within three months of the second exceedance, DAQ will verify and evaluate the monitoring data; within six months, the department will determine what contingency measures should be implemented and make recommendations to the BCC. Contingency measures will be implemented six to twelve months after BCC approval, depending on the time needed to put the measures in place.

### **3.5 CONFORMITY DETERMINATIONS**

EPA's transportation and general conformity rules apply to nonattainment and maintenance areas operating under maintenance plans. Under either rule, one means of demonstrating conformity of federal actions is to show that expected emissions from planned actions are consistent with the emissions budget for the area (Paisie 1995). According to EPA guidance, emissions budgets in limited maintenance areas may be treated as essentially not constraining for the length of the maintenance period because it is unreasonable to expect an area will experience so much growth in that period that a violation of CO NAAQS would occur (Paisie 1995). Under the LMP option, an area can demonstrate conformity without submitting an emissions budget; as a result, emissions do not need to be capped, nor a regional emissions analysis conducted.

In areas with approved LMPs, federal actions requiring conformity determinations under the transportation or general conformity rules may be considered to satisfy the "budget test" required in the respective rules (Paisie 1995). Approval of this LMP does not relieve transportation partners of the other transportation conformity requirements outlined in 40 CFR Part 93.109(b).

Transportation plan revisions and transportation improvement program conformity determinations must satisfy all other applicable requirements of the transportation conformity rule, and hot-spot requirements must be satisfied for transportation projects under 40 CFR Part 93.109(e). DAQ will continue to consult with affected jurisdictions and interested parties to meet these requirements.

## **4.0 CONCLUSION**

DAQ has shown that the Las Vegas Valley CO maintenance area meets the requirements for an LMP. The area's current design value is 2.8 ppm, significantly lower than the 7.65 ppm threshold. CO levels in the Las Vegas Valley have stayed well below the CO NAAQS since the area's redesignation to attainment in 2010. An attainment inventory for 2017 has been provided. The emission controls DAQ has adopted and implemented to maintain the standard continue to be permanent and enforceable. DAQ has committed to continue operating a CO monitoring network that would identify any violations of the NAAQS, and has a contingency plan to address such violations. Having fulfilled the criteria for a second 10-year maintenance plan, DAQ asks EPA to approve this second 10-year LMP for the Las Vegas Valley CO maintenance area.

# **APPENDIX A**

**Letter from EPA to DAQ approving the J.D. Smith station closure and the proposed Walnut Community Center station, dated August 7, 2017**



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

AUG 07 2017

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:

This letter provides the Environmental Protection Agency's (EPA's) review and approval for the Clark County Department of Air Quality's (DAQ's) discontinuation of the CO, O<sub>3</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> State or Local Air Monitoring Station (SLAMS) monitors at JD Smith (AQS ID: 32-003-2002), as well as the approval of the proposed CO, O<sub>3</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> SLAMS monitors at the new Walnut Community Center/Cecile Avenue (Walnut/Cecile). On January 18, 2017, April 18, 2017, and April 25, 2017, DAQ sent letters to EPA describing the proposals to discontinue monitoring at JD Smith. Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors.

Discontinuation of the CO monitor was reviewed by EPA against criteria contained in 40 CFR 58.14(c)(1). According to certified data submitted to EPA's Air Quality System (AQS), the JD Smith site was in attainment of the 1971 1-hour CO and 8-hour CO National Ambient Air Quality Standards (NAAQS) from 2011 through 2016. As demonstrated in DAQ's letter and supporting documentation, based on design values from 2011-2015, there is a less than 10 percent probability of exceeding 80 percent of the NAAQS during the next three years at this site. Concentrations available for 2016 and a portion of 2017 are consistent with the historical trend and continue to show low values. This CO monitor is not specifically required by an attainment or maintenance plan, and DAQ will continue to operate three CO monitors in the Las Vegas CO maintenance area. Furthermore, discontinuance of this monitor will not prevent DAQ from meeting 40 CFR 58 Appendix D requirements.

Under 40 CR 58.14(c), requests for site closures may be approved on a case-by-case basis as long as the discontinuance does not compromise data collection for implementation of the NAAQS and the requirements of 40 CFR 58 Appendix D continue to be met. NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> monitoring at the JD Smith site were reviewed according to these provisions, based on certified data submitted to AQS.

There were 5 NO<sub>2</sub> monitors operating in Clark County at the end of 2016, including 3 area-wide sites, and 2 near-road sites that began operation in 2015 and 2016. In 2017, DAQ also initiated NO<sub>2</sub> monitoring at a sixth site, Jerome Mack (AQS ID: 32-003-0540), which is an area-wide site. The JD Smith site was in attainment of the 1971 annual NO<sub>2</sub> NAAQS from 2011 through 2016. Also, as demonstrated in DAQ's letter and supporting documentation, based on valid design values from 2011-2015, there is a less than 10 percent probability of exceeding 80 percent of the annual NAAQS during the next three years at this site. For the 2010 1-hour NO<sub>2</sub> NAAQS, design values throughout DAQ's network are invalid for 2013-2016 due to low data completeness related to NO<sub>x</sub> instrument problems for some quarters in 2013 and 2014, and are slightly higher at JD Smith than at other sites in DAQ's

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network. However, concentrations are well below the NAAQS, and data from 2015-2017 suggest that one of the near-road sites will be the design value site for the county when three complete years of data are available. Finally, 40 CFR 58 Appendix D requires a maximum concentration area-wide NO<sub>2</sub> site, which has historically been met by JD Smith. However, concentrations at Sunrise Acres (AQS ID: 32-003-0561), an RA-40 designated site, are very similar to those at JD Smith and would be sufficient to meet this requirement. Therefore, based on NO<sub>2</sub> monitoring at Sunrise Acres and elsewhere within DAQ's network, discontinuance of the JD Smith NO<sub>2</sub> monitor does not compromise data collection needed for implementation of the NO<sub>2</sub> NAAQS and will not prevent DAQ from meeting 40 CFR 58 Appendix D requirements.

There were 12 O<sub>3</sub> monitors operating in Clark County at the end of 2016. Over the six-year period from 2011 through 2016, design values at JD Smith were consistently lower than at the Joe Neal site (AQS ID: 32-003-0075) and consistently equal to or lower than at Palo Verde (AQS ID: 32-003-0073) and Paul Meyer (AQS ID: 32-003-0043). Preliminary data currently available for a portion of 2017 is also consistent with these longer-term trends. Although JD Smith has a 2016 design value of 0.073 ppm which violates the 2015 8-hour O<sub>3</sub> NAAQS, as noted in DAQ's January 18, 2017 letter and supporting documentation, it is not currently and is unlikely to become the maximum O<sub>3</sub> concentration site for the county, and O<sub>3</sub> concentrations at other sites in DAQ's network are highly correlated with concentrations at JD Smith. Furthermore, discontinuance of this monitor does not compromise data collection needed for implementation of the O<sub>3</sub> NAAQS and will not prevent DAQ from meeting 40 CFR 58 Appendix D requirements.

There were 7 PM<sub>2.5</sub> monitors operating in Clark County at the end of 2016. In 2017, DAQ also initiated PM<sub>2.5</sub> monitoring at an eighth site, Paul Meyer. The JD Smith site was in attainment of the 2006 24-hour PM<sub>2.5</sub> NAAQS and the 2012 annual PM<sub>2.5</sub> NAAQS for 2015 and 2016; 2011-2014 design values at JD Smith were invalid due to incomplete data in 2010-2012. DAQ removed the PM<sub>2.5</sub> FRM operating at the site in late 2010 and operated a non-regulatory continuous PM<sub>2.5</sub> monitor until replacing it with a continuous FEM in late 2012. In 2013-2016, annual averages and annual 98<sup>th</sup> percentile values based on regulatory data were consistently lower at JD Smith than at Sunrise Acres. A comparison of all continuous data between JD Smith and Sunrise Acres during 2010-2012 shows that JD Smith consistently recorded lower annual averages and annual 98<sup>th</sup> percentile concentrations than at Sunrise Acres. Daily 24-hour average concentrations during this time period are also generally lower at JD Smith than at Sunrise Acres. Therefore, JD Smith is not and is unlikely to become the maximum PM<sub>2.5</sub> concentration site for the county, and all annual averages, annual 98<sup>th</sup> percentile values, and valid and invalid design values for JD Smith during 2011-2016 are below the corresponding NAAQS. Furthermore, discontinuance of this monitor does not compromise data collection needed for implementation of the PM<sub>2.5</sub> NAAQS and will not prevent DAQ from meeting 40 CFR 58 Appendix D requirements.

There were 10 PM<sub>10</sub> monitors operating in Clark County at the end of 2016. The JD Smith site was in attainment of the 1987 24-hour PM<sub>10</sub> NAAQS from 2011-2016. JD Smith was also not the design value site in Clark County or the PM<sub>10</sub> maintenance area during this period, except during 2013 and 2014. Historically, during 2011-2016, exceedances in the area were usually measured area-wide at multiple monitors, and other sites typically measured higher concentrations than at JD Smith. Joe Neal is the current design value site for the PM<sub>10</sub> maintenance area based on 2016 design values, and three other sites also have higher 2016 design values than at JD Smith. Also, as noted in DAQ's April 17, 2017 letter and supporting documentation, PM<sub>10</sub> concentrations at JD Smith are highly correlated with concentrations at Sunrise Acres, with an R<sup>2</sup> of 0.89 for daily data from 2012-2016. Furthermore,



discontinuance of this monitor does not compromise data collection needed for implementation of the PM<sub>10</sub> NAAQS and will not prevent DAQ from meeting 40 CFR 58 Appendix D requirements.

Finally, discontinuation of the monitors at JD Smith will allow DAQ to use the equipment to begin monitoring at the Walnut/Cecile site. As part of this request, EPA also reviewed the proposal for CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> SLAMS monitors at the Walnut/Cecile site as provided in the DAQ's 2016 annual network plan (ANP). This site will have similar monitoring objectives and spatial scales as JD Smith and will be located in an area that is not currently well-represented by the existing monitoring network.

Based on these analyses, EPA approves DAQ's discontinuation of the JD Smith CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> SLAMS monitors, and also approves DAQ's proposal for SLAMS monitoring for these same pollutants at the Walnut/Cecile site. The approval of new SLAMS monitors assumes that the new site will meet all 40 CFR 58 requirements, including the siting requirements specified in Appendix E, as described in the site table for the proposed site in DAQ's 2016 ANP. Please work with EPA to ensure that the new site meets all relevant requirements. Also, please include these network modifications and EPA's approval in your next ANP. If there are any questions regarding this letter, please feel free to contact me at (415) 947-4534 or Anna Mebust of my staff at (415) 972-3265.

Sincerely,



Meredith Kurpius  
Manager, Air Quality Analysis Office

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

# **APPENDIX B**

## **Documentation of Public Review Process**

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## 1.0 30-DAY PUBLIC COMMENT PERIOD

### 1.1 NOTICE OF PUBLIC COMMENT AND PUBLIC HEARING

**NOTICE OF PUBLIC COMMENT PERIOD AND PUBLIC HEARING  
ON THE PROPOSED SECOND 10-YEAR CARBON MONOXIDE  
LIMITED MAINTENANCE PLAN**

NOTICE IS HEREBY GIVEN of a public comment period and public hearing on the proposed *Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada* (LMP). The Las Vegas Valley carbon monoxide (CO) nonattainment area was redesignated to attainment on September 27, 2010, following U.S. Environmental Protection Agency approval of Clark County's *Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area*. The 2008 maintenance plan detailed Clark County's attainment of the CO National Ambient Air Quality Standard (NAAQS) and the control measures put in place to ensure the standard was maintained over the next 10 years (through 2020). Under Section 175A of the Clean Air Act, Clark County is required to submit a plan demonstrating attainment of the CO NAAQS for a second 10-year period following the expiration of the initial maintenance period. This Limited Maintenance Plan (LMP) serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area and demonstrates how the area will remain in attainment of the standard through 2030. If adopted, the LMP will be submitted to the state of Nevada and the U.S. Environmental Protection Agency as a revision to the Nevada State Implementation Plan.

NOTICE IS FURTHER GIVEN that a 30-day public comment period will begin on February 15, 2019, and end at 4:00 PM on March 18, 2019. The public may review and provide written comments on the proposed LMP during this period. The Board of County Commissioners will consider the proposed LMP, along with all written and any oral public comments, at a public hearing at 10:00 AM on May 7, 2019, in the Commission Chambers at the Clark County Government Center, 500 S. Grand Central Parkway, Las Vegas, NV.

Copies of the proposed LMP 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 Pruettt at (702) 455-3206.

Any written comments must be submitted no later than 4:00 PM on March 18, 2019. Comments should be addressed to Araceli Pruettt at the mailing address above, emailed to [araceli.pruett@clarkcountynv.gov](mailto:araceli.pruett@clarkcountynv.gov), or faxed to her attention at (702) 383-9994.

Published: February 14, 2019

  
Marci D. Henson, Director

## 1.2 DAQ WEBSITE NOTICES

Clark County / Air Quality

**Quick Look-up**

I Want To...

Most Popular

**Air Quality**

- Services
- Contact Us
- About Us
- Complaints
- Monitoring
- Fees
- Forms & Applications
- Notices & Meetings
- Planning Initiatives
- Rules & Regulations
- Small Business Assistance
- CCOHV Advisory Committee
- Visibility Cameras
- List Server

**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.

**Announcements**

- Fee Adjustment 2019**  
The Air Quality fees for all Stationary Sources with Air Quality Permit and all holders of Dust Control Permits will be adjusted effective 3/1/2019. [More Information](#)
- Proposed Carbon Monoxide Limited Maintenance Plan**  
DAQ welcomes comments on the proposed Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada. [More Information](#)
- List Server**  
Air Quality is introducing a new 'List Server' feature on our website that will allow interested persons to sign-up for various categories of email notifications and alerts from Air Quality. [More Information](#)
- Public Hearing for Permitting Action**  
Hearing is at 5 p.m., Thursday, Jan. 17 at Clark County Operations Center West. [More Information](#)
- Air Quality Map Assistant**  
A new online mapping program is now available for the public that shows areas covered under Dust Control Operating Permits (DCOPs). [More Information](#)

**Explore**

- Smog Spotter - Report Smoking Vehicles
- Club Ride
- Enviroflash
- Nevada Wildlife Management
- Desert Conservation Program
- Clark County OHV Adv Cmte

**Upcoming Events**

- 2019 Dust Class  
Feb 19, 2019
- 2019 Dust Class  
Mar 7, 2019
- 2019 Dust Class  
Mar 28, 2019

[View All Events](#)

**Service Spotlight**


**Hours of Operation**

Monday through Friday 7:30 AM to 4:00 PM  
[Read More](#)

The screenshot shows the Clark County website interface. At the top, there is a navigation bar with links for Home, Subscribe to Newsfeed, English, and Español. Below this is a secondary menu 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 menu.

The main content area features a breadcrumb trail: Clark County / Air Quality / Announcements / Proposed Carbon Monoxide Limited Maintenance Plan. On the left, there is a 'Quick Look-up' section with dropdown menus for 'I Want To...' and 'Most Popular'. Below this is a vertical menu for 'Air Quality' with various sub-links like Services, Contact Us, About Us, Complaints, Monitoring, Fees, Forms & Applications, Notices & Meetings, Planning Initiatives, Rules & Regulations, Small Business Assistance, CCOHV Advisory Committee, Visibility Cameras, and List Server.

The main article is titled '2/14/2019 - Proposed Carbon Monoxide Limited Maintenance Plan'. It includes social sharing buttons for Facebook, LinkedIn, and Google+. The contact information for Araceli Pruett is provided: Phone: 702-455-3206, Email: [araceli.pruett@clarkcountynv.gov](mailto:araceli.pruett@clarkcountynv.gov). The article text states: 'DAQ welcomes comments on the proposed Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada. The public has the opportunity to [review and comment](#) on the draft document. The 30-day public comment period is from February 15, 2019 through March 18, 2019. Comments must be received by March 18, 2019, 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 May 7, 2019, at 10:00 AM in the Commission Chambers, Clark County Government Center, 500 South Grand Central Parkway, Las Vegas, NV.'



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[Residents](#) | [Visitors](#) | [Econ. Dev.](#) | [About Clark County](#) | [Elected Officials](#) | [Services](#) | [Departments](#) | [ClarkConnect](#)

Clark County / Air Quality / AQ 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](#) ▶

[CCOHV Advisory Committee](#)

[Visibility Cameras](#)

[List Server](#)

Air Quality Planning

## Planning Notices

**02/14/2019 - PUBLIC NOTICE - PROPOSED CARBON MONOXIDE LIMITED MAINTENANCE PLAN**

DAQ welcomes comments on the proposed *Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada*. Under Section 175A of the Clean Air Act, Clark County is required to submit a plan demonstrating attainment of the carbon monoxide (CO) National Ambient Air Quality Standard for a second 10-year period following the expiration of the initial maintenance period (2020). This plan serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area and demonstrates how the area will remain in attainment of the standard through 2030. If adopted, this plan will be submitted to the State of Nevada and U.S. Environmental Protection Agency as a revision to the Nevada State Implementation Plan.

Review Documents	Public Comment Period	Public Hearing
<a href="#">Public Notice</a> <a href="#">Proposed SIP</a>  Documents may be reviewed in person at:  Clark County Department of Air Quality 4701 W. Russell Rd, Ste. 200 Las Vegas, NV 89118	Dates: February 15 - March 18, 2019  Submit comments in writing to:  <b>Email:</b> <a href="mailto:araceli.pruett@clarkcountynv.gov">araceli.pruett@clarkcountynv.gov</a> <b>Fax:</b> (702) 383-9994 <b>Mail:</b> Araceli Pruet Clark County Department of Air Quality 4701 W. Russell Rd, Ste. 200 Las Vegas, NV 89118	<b>Date:</b> Tuesday, May 7, 2019 <b>Time:</b> 10:00 AM <b>Place:</b> Commission Chambers Clark County Government Center 500 South Grand Central Parkway Las Vegas, NV 89155

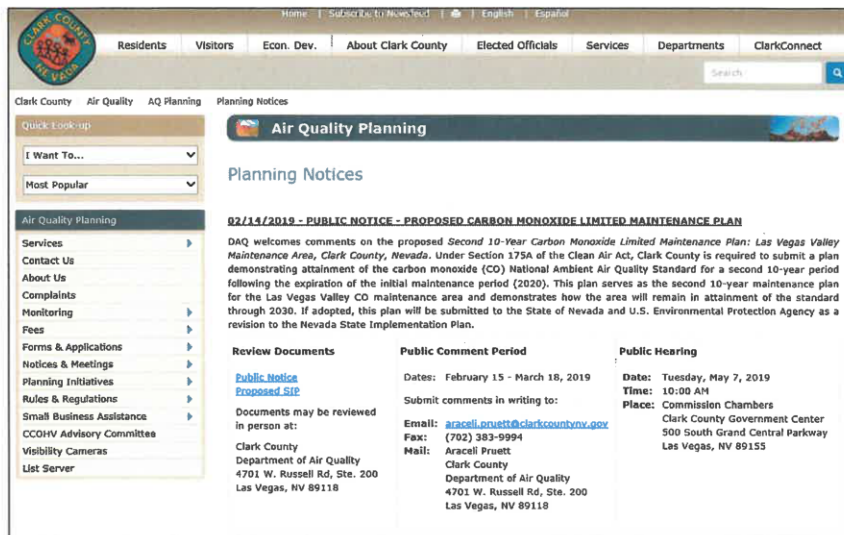
1.2.1 Affidavit of DAQ Website Posting

**AFFIDAVIT OF WEBSITE POSTING OF PUBLIC NOTICE**

STATE OF NEVADA )  
 ) ss.  
 COUNTY OF CLARK )

I, Araceli Pruet, 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 *Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada* was posted on the DAQ website from February 14, 2019, through March 18, 2019. Below is a screenshot of the posting on the DAQ website at:

[http://www.clarkcountynv.gov/airquality/planning/Pages/Planning\\_Notices.aspx](http://www.clarkcountynv.gov/airquality/planning/Pages/Planning_Notices.aspx)



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

Araceli Pruet  
 Araceli Pruet  
 DAQ Planner

Subscribed and sworn to before me this 1 day of April, 2019.

Brianna Michelle Holland  
 NOTARY PUBLIC  
 My Commission Expires: September 13, 2020

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



### 1.3 CLARK COUNTY WEBSITE NOTICE

Home | Subscribe to Newsfeed | English | Español

Residents | Visitors | Econ. Dev. | About Clark County | Elected Officials | Services | Departments | ClarkConnect

Search

Clark County News Empress Al-Yasha Takes Vegas by Storm Feb. 16

Clark County Government Center

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

Stay Connected

- Meeting Agendas
- Newsletters
- CCTV Live
- News RSS Feeds
- Ethics & Disclosures
- Guides & Directories
- Committees, Councils, Boards
- Performance Mgmt
- News Releases

More Clark County News

- Government Surplus Auction Set for Saturday, March 2  
The first Government Surplus Auction of 2019 set for Saturday, March 2. Pre-registration opens Wednesday, Feb. 27. [More Information](#)
- Public Comment Sought on Proposed Carbon Monoxide Limited Maintenance Plan**  
The Department of Air Quality welcomes public comment on the proposed Second 10-Year Carbon Monoxide Limited Maintenance Plan for Clark County. [More Information](#)
- Download the Clark County Parks App  
Our Parks & Recreation Department now has a new App that you can download to stay in the know about what's going on at County parks and community

Featured Events

### 1.4 DAQ FACEBOOK POSTING

Clark County Department of Air Quality

Like Follow Share

ClarkCountyNV.gov/AirQuality

Like Comment Share

**Clark County Department of Air Quality**  
February 21 at 3:39 PM · 🌐

Air Quality is now accepting public comments on the Proposed Carbon Monoxide Limited Maintenance Plan. The 30-day public comment period ends at 4 p.m. Monday, March 18.

Follow the link below for more information.

**CLARKCOUNTYNV.GOV**  
**Planning Notices**  
DAQ welcomes comments on the proposed Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada. Under Section 175A.

2 Shares

Like Comment Share

Write a comment...

### 1.5 DAQ TWITTER POSTING

**Clark County Air** @CCAirQuality Follows you

Tweets **761** Following **217** Followers **515** Likes **328**

**Clark County Air** @CCAirQuality · Feb 21

Air Quality is now accepting public comments on the Proposed Carbon Monoxide Limited Maintenance Plan. The 30-day public comment period ends at 4 p.m. Monday, March 18.

Click here for more information: [bit.ly/2NITnqe](https://bit.ly/2NITnqe)

1 Retweet 1 Like

**1.6 E-NOTICE****Araceli Pruett**

**From:** Araceli Pruett  
**Sent:** Thursday, February 14, 2019 8:27 AM  
**Subject:** NOTICE OF PUBLIC COMMENT PERIOD FOR THE PROPOSED SECOND 10-YEAR CARBON MONOXIDE LIMITED MAINTENANCE PLAN

NOTICE IS HEREBY GIVEN of a public comment period and public hearing on the proposed *Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada* (LMP). The Las Vegas Valley carbon monoxide (CO) nonattainment area was redesignated to attainment on September 27, 2010, following U.S. Environmental Protection Agency approval of Clark County's *Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area*. The 2008 maintenance plan detailed Clark County's attainment of the CO National Ambient Air Quality Standard (NAAQS) and the control measures put in place to ensure the standard was maintained over the next 10 years (through 2020). Under Section 175A of the Clean Air Act, Clark County is required to submit a plan demonstrating attainment of the CO NAAQS for a second 10-year period following the expiration of the initial maintenance period. This Limited Maintenance Plan (LMP) serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area and demonstrates how the area will remain in attainment of the standard through 2030. If adopted, the LMP will be submitted to the state of Nevada and the U.S. Environmental Protection Agency as a revision to the Nevada State Implementation Plan.

NOTICE IS FURTHER GIVEN that a 30-day public comment period will begin on February 15, 2019, and end at 4:00 PM on March 18, 2019. The public may review and provide written comments on the proposed LMP during this period. The Board of County Commissioners will consider the proposed LMP, along with all written and any oral public comments, at a public hearing at 10:00 AM on May 7, 2019, in the Commission Chambers at the Clark County Government Center, 500 S. Grand Central Parkway, Las Vegas, NV.

Copies of the proposed LMP 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 March 18, 2019. Comments should be addressed to Araceli Pruett at the mailing address above, emailed to [araceli.pruett@clarkcountynv.gov](mailto:araceli.pruett@clarkcountynv.gov), or faxed to her attention at (702) 383-9994.

Published: February 14, 2019

### 1.6.1 E-Notice Distribution List

PLANNING E-NOTICE DISTRIBUTION LIST	
Organization	Contact
Air & Waste Management Association	Paul Fransioli
American Lung Association Nevada	James Martinez
Bureau of Land Management	Lisa Christianson
City of Boulder City	Michael Mays
City of Henderson	Sean Robertson
City of Las Vegas	Marco Velotta
City of Las Vegas	Milagros (Miles) Escuin
City of Las Vegas	Robert Summerfield
City of North Las Vegas	Alfredo Melesio
City of North Las Vegas	Johanna Murphy
Clark County	Daniel Kezar
Clark County	Mario Bermudez
Clark County School District	Chris Dingell
Clark County School District	Dimitrios Karapanagiotis
Las Vegas Valley Water District	Brian Bowler
Nellis Air Force Base	Shimi Mathew
Nevada Department of Environmental Protection	Sheryl Fontaine
Nevada Department of Environmental Protection	Sig Jaunarajs
Nevada Resort Association	Sabrina Santiago
Nevada Resort Association	Virginia Valentine
Regional Flood Control	Steve Parrish
Regional Transportation Commission	Beth Xie
Regional Transportation Commission	Craig Raborn
Sierra Club Toiyabe Chapter	Brian Beffort
Southern Nevada Health District	Nicole Bungum
Southern Nevada Off Road Enthusiasts	Ken Thatcher
Southern Nevada Water Authority	Ayoub
Southern Nevada Water Authority	Keiba Crear
Southern Nevada Water Authority	Thomas Maher
University of Nevada Las Vegas	Dave James, PhD.
Southern Nevada Home Builders	Amanda Moss
Southern Nevada Home Builders	Nat Hodgson
Washoe County Health District	Charlene Albee
Washoe County Health District	Daniel Inouye

**1.7 PUBLIC COMMENT REPORT**

Public Notice:                      DAQ Website: February 14, 2019 through March 18, 2019

   Clark County Website: February 21, 2019 through March 18, 2019

Public Comment Period              February 15, 2019 through March 18, 2019

Formal Comments Received:        None

## 2.0 BOARD OF COUNTY COMMISSIONERS MEETING – 4/16/19 (SET PUBLIC HEARING)

### 2.1 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 May 7, 2019, at 10:00 AM to approve, adopt, and authorize submittal of the proposed “Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada” 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 PGM/Grant:	N/A
Amount:	N/A		
Description:	N/A		
Additional Comments:	N/A		

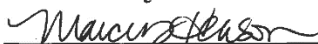
**BACKGROUND:**

The Board of County Commissioners adopted the Clark County Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area on September 2, 2008 (2008 Maintenance Plan). On September 27, 2010, the U.S. Environmental Protection Agency (EPA) found Clark County had attained the standard, issuing final approval of the 2008 Maintenance Plan and redesignating the Las Vegas Valley carbon monoxide (CO) nonattainment area to attainment. The 2008 Maintenance Plan demonstrated Clark County’s attainment of the CO National Ambient Air Quality Standard (NAAQS) and identified the control measures in place to ensure the standard was maintained through 2020.

Under Section 175A of the Clean Air Act, Clark County is required to submit a plan demonstrating attainment of the CO NAAQS for a second 10-year period following the expiration of the initial maintenance period. The attached Limited Maintenance Plan (LMP) serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area. Its purpose is to demonstrate how the area continues to attain the CO NAAQS and will remain in attainment of the standard during the second maintenance period (through 2030).

The proposed LMP was made available for public comment from February 15, 2019, through March 18, 2019. No comments were received. A public hearing on May 7, 2019, will provide the public with an additional opportunity to provide comments on the proposed revision.

Respectfully Submitted,



MARCI HENSON  
Director, Department of Air Quality

Cleared for Agenda

Agenda Item #

## 2.2 MEETING SUMMARY

BCC JOINT MEETING REGULAR - 4/16/19

Page 22 of 30

- 68 Approve the grant application to be submitted by the Clark County District Attorney's Office to the State of Nevada, Office of the Attorney General for the 2019 STOP/SASP Violence Against Women Formula Subgrant in the amount of \$70,000, for the period July 1, 2019 through June 30, 2020; authorize the reallocation of one part time Management Assistant (C00) from the grant position pool, contingent upon the period for which grant funds are available; authorize the District Attorney or his designee to sign the grant award documents; and accept funds awarded. (For possible action)

**ACTION: APPROVED AS RECOMMENDED**

ATTACHMENT: [Clark County Agenda Item.docx](#)

ATTACHMENT: [sexast2019.pdf](#)

- 69 Set a public hearing on May 7, 2019, at 10:00 a.m. to approve, adopt, and authorize submittal of the proposed "Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County, Nevada" 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)

**ACTION: APPROVED AS RECOMMENDED**

ATTACHMENT: [Clark County Agenda Item.docx](#)

ATTACHMENT: [20190401 CO Limited MSIP w Appendices.pdf](#)

**PUBLIC HEARING SET FOR TUESDAY, MAY 7, 2019 AT 10:00 A.M.**

---

END OF CONSENT AGENDA

### SEC. 3. COMMISSIONERS' / COUNTY MANAGER'S RECOGNITION

\*\*\*

- 70 Present a proclamation to Lyft in recognition of funds raised for Susan G. Komen; and present a check for the proceeds to Susan G. Komen.

ATTACHMENT: [Clark County Agenda Item.docx](#)

**PRESENTED AS RECOMMENDED**

- 71 Present a proclamation to Silver State Fair Housing Council proclaiming April 2019 as "Fair Housing Month" in Clark County. (For possible action)

[http://clark.granicus.com/MinutesViewer.php?view\\_id=17&clip\\_id=6266&doc\\_id=d19f67...](http://clark.granicus.com/MinutesViewer.php?view_id=17&clip_id=6266&doc_id=d19f67...) 4/29/2019



### 3.0 BOARD OF COUNTY COMMISSIONERS MEETING – 5/7/19 (CONDUCT PUBLIC HEARING)

#### 3.1 AGENDA ITEM

#### CLARK COUNTY BOARD OF COMMISSIONERS AGENDA ITEM

**Petitioner:** Marci Henson, Director, Department of Air Quality

**Recommendation:**

**Conduct a public hearing; Approve, adopt, and authorize the “Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County Nevada”; 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 PGM/Grant:	N/A
Amount:	N/A		
Description:	N/A		
Additional Comments:	N/A		

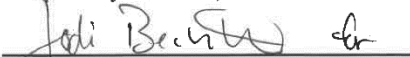
**BACKGROUND:**

The Board of County Commissioners adopted the Clark County Carbon Monoxide Redesignation Request and Maintenance Plan: Las Vegas Valley Nonattainment Area on September 2, 2008 (2008 Maintenance Plan). On September 27, 2010, the U.S. Environmental Protection Agency (EPA) found Clark County had attained the standard, issuing final approval of the 2008 Maintenance Plan and redesignating the Las Vegas Valley carbon monoxide (CO) nonattainment area to attainment. The 2008 Maintenance Plan demonstrated Clark County’s attainment of the CO National Ambient Air Quality Standard (NAAQS) and identified the control measures in place to ensure the standard was maintained through 2020.

Under Section 175A of the Clean Air Act, Clark County is required to submit a plan demonstrating attainment of the CO NAAQS for a second 10-year period following the expiration of the initial maintenance period. The attached Limited Maintenance Plan (LMP) serves as the second 10-year maintenance plan for the Las Vegas Valley CO maintenance area. Its purpose is to demonstrate how the area continues to attain the CO NAAQS and will remain in attainment of the standard during the second maintenance period (through 2030). Appendix B documents the public review process. Information not yet included in Appendix B will be added after the public hearing and upon Board approval of this plan.

The proposed LMP was made available for public comment from February 15, 2019, through March 18, 2019, on the Department of Air Quality (DAQ) and Clark County websites and at the DAQ office at 4701 West Russell Road. No comments were received. Staff recommends the Board approve and adopt this LMP and authorize staff to 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 #

### 3.2 PUBLIC COMMENT REPORT

Public Hearing: May 7, 2019

Formal Comments Received during Public Hearing: None

### 3.3 MEETING SUMMARY

BCC JOINT MEETING REGULAR - 5/7/2019

Page 24 of 28

**Kirkpatrick , Lawrence Weekly , Jim Gibson****VOTING NAY: NONE****ABSTAINING: Tick Segerblom****ABSENT: NONE**

- 77 Conduct a public hearing; Approve, adopt, and authorize the “Second 10-Year Carbon Monoxide Limited Maintenance Plan: Las Vegas Valley Maintenance Area, Clark County Nevada”; 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.docx](#)ATTACHMENT: [20190401 CO Limited MSIP w Appendices.pdf](#)**MOVED BY: Justin Jones****ACTION: APPROVED AS RECOMMENDED****VOTE: 6-0****VOTING AYE: Michael Naft , Justin Jones , Larry Brown , Marilyn****Kirkpatrick , Jim Gibson , Tick Segerblom****VOTING NAY: NONE****ABSTAINING: NONE****ABSENT: Lawrence Weekly**

- 78 Conduct a public hearing; adopt, approve and authorize the Chair to sign an ordinance to amend Clark County Titles 6 and 7 concerning the licensure of hospitals, urgent care centers, clinics and laboratories; providing for licensure of hospitals, urgent medical centers, clinics and laboratories; establishing requirements for medical facilities that offer or advertise emergency medical services; requiring certain medical facilities to be certified by CMS and accept payments from Medicare and Medicaid; providing for business license fees; providing for suspension, revocation or nonrenewal of a business license for noncompliance and penalties; and provide for other matters properly related thereto. Commission District: All (For possible action)

ATTACHMENT: [Clark County Agenda Item.docx](#)ATTACHMENT: [PubHear\\_HospitalOrd\\_Ord\\_20190507a.doc](#)**MOVED BY: Jim Gibson****ACTION: APPROVED (INCLUDING ADOPTION OF ORDINANCE NO. 4688) AS RECOMMENDED****VOTE: 6-0****VOTING AYE: Michael Naft , Justin Jones , Larry Brown , Marilyn****Kirkpatrick , Jim Gibson , Tick Segerblom****VOTING NAY: NONE**[http://clark.granicus.com/MinutesViewer.php?view\\_id=17&clip\\_id=6286&doc\\_id=db7ef2...](http://clark.granicus.com/MinutesViewer.php?view_id=17&clip_id=6286&doc_id=db7ef2...) 5/21/2019