

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

*Jim Gibbons, Governor*

*Allen Biaggi, Director*

*Leo M. Drozdoff, P.E., Administrator*

October 9, 2009

Laura Yoshii  
Acting Regional Administrator  
OAR-1, USEPA Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**RE: Recommended Area Designations for the 2008 National Ambient Air Quality Standards for Lead (73 FR66964; November 12, 2008)**

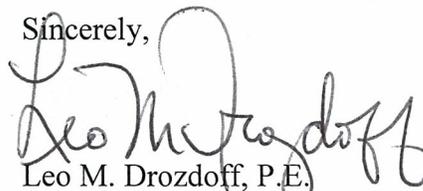
Dear Ms. Yoshii:

On behalf of Governor Jim Gibbons, as his appointed designee, pursuant to Section 107(d)(1) of the 1990 Clean Air Act, I am submitting this letter to the U.S. Environmental Protection Agency (EPA) recommending that all counties in the State of Nevada, of which there are seventeen (17), be designated unclassifiable.

Both the Air Quality Management Division of the Washoe County Health District and the Department of Air Quality and Environmental Management in Clark County have requested that they be designated unclassifiable. Copies of their letters are enclosed. In accordance with EPA's August 21, 2009 guidance memo from William T. Harnet, the Nevada Division of Environmental Protection recommends unclassifiable for the entire state because sufficient data are not available to make an attainment or nonattainment determination.

If you have any questions please do not hesitate to contact Michael Elges at: (775) 687-9329.

Sincerely,



Leo M. Drozdoff, P.E.  
Administrator

Enclosures (2)

cc: Robin Reedy, Chief of Staff, Office of the Governor  
Allen Biaggi, Director, DCNR  
Colleen Cripps, Deputy Administrator, NDEP  
Michael Elges, Chief, Bureau of Air Quality Planning, NDEP  
Greg Reimer, Chief, Bureau of Air Pollution Control, NDEP  
Andrew Goodrich, Director, AQMD, Washoe County District Health Department  
Lewis Wallenmeyer, Director, Clark County DAQEM  
Lisa Hanf, Chief, Planning Office, USEPA Region IX (Air-2)

CERTIFIED MAIL NUMBER: 7008 1140 0004 4029 4347





# WASHOE COUNTY HEALTH DISTRICT AIR QUALITY MANAGEMENT DIVISION



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September 9, 2009

Nevada  
Environmental Protection

SEP 15 2009

RECEIVED

SEP 11 2009

BAPO/BAQP

ENVIRONMENTAL PROTECTION

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

**Re: Washoe County's Designation for the 2008 Revised Lead National Ambient Air Quality Standard (73 FR 66964; November 12, 2008)**

Dear Mr. Drozdoff:

Pursuant to Section 107(d)(1) of the Clean Air Act, the governor of each state is to recommend area designations to the USEPA whenever a National Ambient Air Quality Standard (NAAQS) is revised. Based on a memorandum from Mr. William T Harnett, Division Director of the USEPA's Air Quality Policy Division, Washoe County's designation recommendation for the 2008 revised lead NAAQS must be made by October 15, 2009.

The Air Quality Management Division of the Washoe County Health District (AQMD) does not have current lead monitoring data for record collected within the last three years (2006-2008). In fact, the most recent data for record lead monitoring was performed over 15 years ago at which time, however, no violations of the 1978 lead NAAQS were reported. Based on this information, the AQMD recommends that Washoe County be designated as an "unclassified" area for the 2008 revised lead NAAQS.

In addition, current lead monitoring for the revised NAAQS will not be required of the AQMD as Washoe County is below the population and permitted source emission thresholds.

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

Sincerely,

Andrew C. Goodrich, REM  
Director

cc: Laura Yoshii, Acting Regional Administrator, USEPA Region IX  
Colleen Cripps, Deputy Administrator, NDEP  
Duane Sikorski, Washoe County Health District AQMD

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

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# DAQEM

## DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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

Lewis Wallenmeyer Director · Tina Gingras Assistant Director

September 17, 2009

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

### Re: Recommendation of Clark County Designation for Federal Lead Standard

In accordance with the Clean Air Act and U.S. Environmental Protection Agency rules (40 CFR 50, 51, 53, and 58), the Clark County Department of Air Quality and Environmental Management (DAQEM) has determined that Clark County is unclassifiable under the National Ambient Air Quality Standard (NAAQS) for lead because it does not operate Federal Reference Method (FRM) samplers for this pollutant.

In addition to confirming the absence of FRM lead sampling data, DAQEM reviewed the lead emissions inventory and source data and verified that no industrial facility or other source in Clark County emits a ton or more of lead per year. DAQEM also reviewed three years of PM<sub>2.5</sub> ambient chemical speciation data from a Source Analysis Sampling System monitor to check ambient lead concentrations. Although the monitor measures only a portion of total ambient lead concentrations, the running three-month average—truncated to three decimal places in accordance with NAAQS procedures—is 0.005 µg/m<sup>3</sup>. These findings substantiate the recommendation to designate Clark County as unclassifiable for the lead NAAQS.

For ongoing measurement of ambient lead levels, DAQEM's *Annual Network Plan Report* (June 2009) commits Clark County to establish and operate one non-source-oriented lead sampler by January 1, 2011.

If you have any questions, please contact me at (702) 455-1600.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Wallenmeyer".

Lewis Wallenmeyer  
Director



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