



February 2, 2025

Mr. Matthew Lakin
Director, Air & Radiation Division
ORA-1, USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Recommended Designations for the Primary Annual PM_{2.5} National Ambient Air Quality Standards (NAAQS) (89 Federal Register 16202, February 7, 2024)

Dear Mr. Lakin,

On February 7, 2024, the U.S Environmental Protection Agency (EPA) announced a final rule to strengthen the nation's National Ambient Air Quality Standards (NAAQS) for fine particulate pollution less than or equal to 2.5 microns, also known as PM_{2.5}. EPA finalized the primary (health-based) annual PM_{2.5} standard at 9.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to reflect new science on harm to public health caused by fine particle pollution. The Nevada Division of Environmental Protection (NDEP) acknowledges that the 24-hour Primary Standard had no change and remains at 35 $\mu\text{g}/\text{m}^3$.

On behalf of Governor Lombardo, as his appointed designee, pursuant to Section 107(d)(1) of the 1990 Clean Air Act, NDEP is submitting this letter requesting that the State of Nevada be designated "attainment" or "unclassifiable" for the Annual PM_{2.5} NAAQS, as follows:

- Hydrographic Area 104 (Carson City), Attainment
- Hydrographic Area 105 (Douglas County), Attainment
- Hydrographic Areas 85 and 87 (Washoe County), Attainment
- Hydrographic Areas 212, 222 and 164A (Clark County), Attainment
- All other hydrographic areas in the State of Nevada, Unclassifiable

The Northern Nevada Public Health Air Quality Management Division (AQMD) has reviewed 2021-2023 data and determined that Hydrographic Areas 85 and 87 in Washoe County is in attainment of the revised annual PM_{2.5} standard. All other Hydrographic Areas within Washoe County are to be designated as unclassifiable. A copy of AQMD's letter with supporting data is enclosed. Attached is also an Exception Events Demonstration that is being submitted concurrently with AQMD's Initial Designation Recommendation letter.

Similarly, the Clark County Department of Environment and Sustainability, Division of Air Quality (DAQ) has reviewed 2021-2023 data and determined that Hydrographic Areas 212, 222 and 164A in Clark County are in attainment of the revised annual PM_{2.5} standard. Additionally, DAQ is

recommending a designation of “unclassifiable” for the remaining portions of Clark County. A copy of DAQ’s letter with supporting data is enclosed.

The Nevada Division of Environmental Protection has two PM_{2.5} monitors that operate in Carson City and Douglas County with three recent years of complete and certified data indicate attainment for the annual NAAQS for PM_{2.5} in the years 2021, 2022 and 2023. Hydrographic Area 104 is represented by the Carson City Armory monitoring site with an annual PM_{2.5} design value of 7.5 µg/m³. Hydrographic area 105 is represented by the Ranchos Aspen Park monitoring site in Douglas County, with an annual PM_{2.5} design value of 8.4 µg/m³, which are represented in Table 1. There are no other PM_{2.5} monitoring sites within NDEP’s jurisdiction. The NDEP therefore requests that all other hydrographic areas under NDEP’s jurisdiction be designated as unclassifiable.

Table 1. Annual PM_{2.5} Design Values for 2021–2023

Annual Standard = 9.0 µg/m ³						
Site Name	Site Code	Hydrographic Area	2021	2022	2023	2021–2023 Design Value
Carson City Armory	32-510-0020	104	12.0	5.7	4.8	7.5 µg/m ³
Ranchos Aspen Park	32-005-0007	215	13.2	6.1	6.1	8.4 µg/m ³

*Source: EPA Air Quality System

Please contact Andrew Tucker, Chief, at (775)-687-9340, if you have any questions or require additional clarification.

Sincerely,


[Jennifer Carr \(Jan 30, 2025 18:28 PST\)](#)

Jennifer L. Carr, PE, CPM, CEM
Administrator

cc :

Anita Lee, USEPA Region 9, Air & Radiation Division
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