



July 22, 2025

Jennifer Carr, Administrator  
Nevada Division of Environmental Protection  
901 S. Stewart Street, Suite 4001  
Carson City, NV 89701

**Re: Clark County's Recommended Designation for the 2024 Secondary Annual SO<sub>2</sub> National Ambient Air Quality Standard**

Dear Ms. Carr:

On December 27, 2024, the U.S. Environmental Protection Agency (EPA) announced the revised 2024 secondary annual National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>), effective January 27, 2025 (89 FR 105692). Section 107(d)(1) of the Clean Air Act requires states to submit their area designation recommendations to EPA within the time frame specified by the agency, but no later than one year after the standard is promulgated.

In accordance with this requirement, the Clark County Department of Environment and Sustainability, Division of Air Quality (DAQ) is recommending a designation of “attainment” for Hydrographic Area 212 (the Las Vegas Valley) and “attainment/unclassifiable” for the remaining areas in Clark County. DAQ requests that the information provided herein be included in the governor’s initial designation recommendation for SO<sub>2</sub>.

As the delegated local air quality authority for Clark County, DAQ is responsible for monitoring local air quality. While the number of monitoring sites may vary from year to year, DAQ currently operates 16 sites across Clark County, as outlined in the “2025 Annual Monitoring Network Plan.” SO<sub>2</sub> data is collected at the National Core multipollutant (NCore) and Photochemical Assessment Monitoring Station, which is at the Jerome Mack site on the east side of the Las Vegas Valley.

Table 1 shows the secondary annual SO<sub>2</sub> design value is 1 part per billion (ppb) for the most recent three-year period (2022–2024), well below the new standard of 10 ppb.

**Table 1. SO<sub>2</sub> Design Values for 2022–2024** (annual standard = 10 ppb)

Site Name	Site Code	HA	2022	2023	2024	2022–2024 Design Value
Jerome Mack N-Core	32-003-0540	212	0.7	0.5	0.8	1

Source: EPA Air Quality System 2024 Design Value Report, accessed 06/05/2025 (available at <https://www.epa.gov/aqs>).

Complete, quality-assured, and certified air quality data confirm that Clark County meets the SO<sub>2</sub> standard. The data presented supports DAQ's recommendation of an "attainment" designation for HA 212 and "attainment/unclassifiable" for all other areas in Clark County, Nevada.

If you have any questions or need additional information, please contact Ted Lendis, Planning Manager, at (702) 455-1653.

Sincerely,

**Marci**  
**Henson**



Digitally signed by  
Marci Henson  
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Marci Henson  
Department of Environment and Sustainability

cc:

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