



**DES**  
**DEPARTMENT OF ENVIRONMENT  
AND SUSTAINABILITY**



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Marci Henson, Director

October x, 2024

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

Email: [jcarr@ndep.nv.gov](mailto:jcarr@ndep.nv.gov)

**Re: Clark County's Recommended Designation for the PM<sub>2.5</sub> National Ambient Air Quality Standards**

Dear Ms. Carr:

As required by Section 107(d)(1) of the Clean Air Act (CAA) and the recently promulgated PM<sub>2.5</sub> rule (89 FR 16202, March 6, 2024), please include the following information regarding Clark County, Nevada, in the governor's initial designation recommendation for particulate matter less than or equal to 2.5 microns (PM<sub>2.5</sub>).

The Department of Environment and Sustainability, Division of Air Quality (DAQ) operates two federal reference method (FRM) samplers and 15 federal equivalent method (FEM) monitors in Clark County. Complete, quality-assured, certified air quality data for the most recent three-year period (2021–2023) shows attainment of both the annual and 24-hour primary PM<sub>2.5</sub> National Ambient Air Quality Standards (NAAQS). Additional PM<sub>2.5</sub> monitors with less than three years of complete data do not show design values exceeding either the annual or 24-hour PM<sub>2.5</sub> NAAQS. Attachment 1 shows the annual and 24-hour PM<sub>2.5</sub> design values for the years 2021–2023.

Clark County through DAQ is recommending a designation of “attainment” for Hydrographic Areas 212, 222, and 164A and a designation of “unclassifiable” for the remaining portions of Clark County. Hydrographic Area 212 is represented by the Sunrise Acres monitoring site with an annual PM<sub>2.5</sub> design value of 8.7 µg/m<sup>3</sup> and a 24-hour design value of 29 µg/m<sup>3</sup>. Hydrographic Area 222 is represented by the Virgin Valley High School monitoring site with an annual PM<sub>2.5</sub> design value of 4.0 µg/m<sup>3</sup> and a 24-hour design value of 11 µg/m<sup>3</sup>. Hydrographic Area 164A is represented by the Jean monitoring site, with an annual PM<sub>2.5</sub> design value of 3.7 µg/m<sup>3</sup> and a 24-hour design value of 12 µg/m<sup>3</sup>. Hydrographic Area 167 is covered by the Garrett Junior High School monitoring site; however, this site did not begin operating until April 1, 2021, so it does not meet the data completeness requirements of 40 CFR 50, Appendix N, and cannot provide a valid design value for 2021–2023. DAQ therefore requests that EPA designate Hydrographic Area 167 “unclassifiable.”

Jennifer Carr, NDEP Administrator  
10/x/2024  
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If you have any questions or require further information, please contact Ted Lendis, Planning Manager, at (702) 455-1653.

Sincerely,

Marci Henson  
Director

Attachment:  
PM<sub>2.5</sub> Monitoring Data for Clark County

cc:  
Andrew Tucker, NDEP  
Ken McIntyre, NDEP  
Patricia Bobo, NDEP  
Francisco Vega, NNPH  
Craig Petersen, NNPH  
Ted Lendis, DES  
Dawn Leaper, DES  
Araceli Pruett, DES

## Attachment 1: Clark County, NV 2021-2023 PM<sub>2.5</sub> Design Values

**Table 1. Clark County Annual PM<sub>2.5</sub> Design Values for 2021–2023**

Annual Standard = 9.0 µg/m <sup>3</sup>						
Site Name	Site Code	Hydrographic Area	2021	2022	2023	2021-2023 Design Value
Garrett Junior High School	32-003-0602	167	5.0 <sup>1</sup>	3.8	3.5	4.1 <sup>1</sup>
Green Valley	32-003-0298	212	5.3	5.0	4.4	4.9
Jean	32-003-1019	164A	4.1	3.6	3.4	3.7
Jerome Mack <sup>2</sup>	32-003-0540	212	8.5	8.6	8.0	8.4
Joe Neal	32-003-0075	212	6.3	5.0	4.6	5.3
Liberty High School	32-003-0299	212	5.5 <sup>1</sup>	4.9	4.1	4.8 <sup>1</sup>
Mountains Edge Park	32-003-0044	212	4.6	3.9	3.7	4.1
Palo Verde	32-003-0073	212	4.8	4.1	3.6	4.2
Paul Meyer	32-003-0043	212	5.5	5.1	4.7	5.1
Rancho & Teddy	32-003-1501	212	8.0	6.5	6.6	7.0
Sunrise Acres <sup>2</sup>	32-003-0561	212	8.8	9.3	8.0	8.7
Virgin Valley High School	32-003-0024	222	4.9	3.6	3.3	4.0
Walnut Community Center	32-003-2003	212	7.9 <sup>1</sup>	6.7	6.3	7.0 <sup>1</sup>
Walter Johnson	32-003-0071	212	4.4	5.0	5.6	5.0

**Source:** EPA Air Quality System, Design Value Report AMP480, accessed 5/30/2024 (available at: <https://www.epa.gov/aqs>).  
<sup>1</sup>Data does not meet completeness criteria; therefore, the design value is invalid.  
<sup>2</sup>FEM and FRM sampling site.

**Table 2. Clark County 24-hour PM<sub>2.5</sub> Design Values for 2021–2023**

24-hour Standard = 35 µg/m <sup>3</sup>						
Site Name	Site Code	Hydrographic Area	2021	2022	2023	2021–2023 Design Value
Garrett Junior High School	32-003-0602	167	15.8 <sup>1</sup>	12.6	9.3	13 <sup>1</sup>
Green Valley	32-003-0298	212	13.1	16.6	8.6	13
Jean	32-003-1019	164A	13.8	12.8	8.3	12
Jerome Mack <sup>2</sup>	32-003-0540	212	23.3	26.8	26.1	25
Joe Neal	32-003-0075	212	19.0	13.7	9.9	14
Liberty High School	32-003-0299	212	18.9 <sup>1</sup>	17.0	8.8	15 <sup>1</sup>
Mountains Edge Park	32-003-0044	212	17.0	12.2	8.0	12
Palo Verde	32-003-0073	212	15.2	13.5	7.9	12
Paul Meyer	32-003-0043	212	17.7	16.3	9.9	15
Rancho & Teddy	32-003-1501	212	20.7	17.9	13.2	17
Sunrise Acres <sup>2</sup>	32-003-0561	212	31.0	29.5	27.2	29
Virgin Valley High School	32-003-0024	222	16.5	9.8	6.3	11
Walnut Community Center	32-003-2003	212	19.7 <sup>1</sup>	18.5	14.2	17 <sup>1</sup>
Walter Johnson	32-003-0071	212	17.2	13.7	9.2	13

**Source:** EPA Air Quality System, Design Value Report AMP480, accessed 5/30/2024 (available at: <https://www.epa.gov/aqs>).  
<sup>1</sup>Data does not meet completeness criteria; therefore, the design value is invalid.  
<sup>2</sup>FEM and FRM sampling site.