Appendix B

EPA Approvals

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 29 2015

Mr. Phillip Wicker
Manager, Air Quality Monitoring
Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, Nevada 89118

Dear Mr. Wicker:

Thank you for your submission of the Clark County Department of Air Quality's (DAQ's) *Annual Monitoring Network Plan Report* in June 2015. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve the following system modifications: SLAMS O_3 monitoring at Indian Springs (AQS ID: 32-003-7772), new SLAMS PM_{10} monitoring at South Las Vegas Valley (AQS ID: TBD), and new SLAMS O_3 and PM_{10} monitoring at Garrett Junior High (AQS ID: TBD).

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third enclosure. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

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We also want to thank you for your timely submission of the 2015 *Five-Year Network Assessment* for the Clark County DAQ, as required under 40 CFR Part 58.10. We recognize that preparing the network assessment was a significant project and we appreciate your effort.

The recently revised ozone NAAQS, finalized on October 1, 2015, includes language that revokes all existing seasonal ozone waivers upon the effective date of the final rule.. EPA Region 9 will consider all previously approved ozone season waivers effective until December 31, 2015. In advance of the 2016 ozone monitoring season (January – December), EPA Region 9 recommends that agencies seeking new ozone waivers for the 2015 8-hour Ozone NAAQS of 0.070 ppm submit waiver requests no later than December 1, 2015.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact Meredith Kurpius at (415) 947-4534 or Michael Flagg at (415) 972-3372.

Sincerely,

Gretchen Busterud
Acting Deputy Director, Air Division

Enclosures:

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
B. Additional Items Requiring Attention
C. Annual Monitoring Network Plan Checklist

cc (via email):

Lewis Wallenmeyer, DAQ
Yousaf Hameed, DAQ

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the system modifications listed in the plan per the applicable requirement. Therefore, we are not acting on the following items as part of this year's annual network plan (see Checklist Row 3):
    - EPA is not approving the request to relocate SLAMS monitors at Sunrise Acres and JD Smith sites to a new location.
    - EPA is also unable to approve the PM_{10} monitor deployment at Walter Johnson due to insufficient information on monitor type (i.e. SLAMS, SPM, etc.).
- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Distance between QA collocated monitors	16	Not meeting requirement
Sampling season for O_3	53	Insufficient information to judge
Minimum monitoring requirement for second near-road NO_2 monitor	55	Not meeting requirement
Distance from supporting structure	78	Insufficient information to judge
Distance from obstructions not on roof	80	Not meeting requirement and insufficient information to judge

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (*C. Annual Monitoring Network Plan Checklist).*

B. Additional Items Requiring Attention

- [Item 9] Two near-road sites were approved by EPA as part of the 2014 ANP. Sites were required to begin operation by January 1, 2015. DAQ notes the Teddy and Rancho site started monitoring NO_2 in 2015 (page 45) and that the Central Fire Station site is anticipated to begin monitoring in 2015 (page 15). Please include exact start dates in next year's ANP.

- [Items 17 and 18] Please list flow rates in next year's ANP.

- [Item 73] Please include exact start date of Teddy and Rancho and Central Fire Station sites.

- [Item 62] Please provide AQS IDs for South Las Vegas Valley and Garrett Junior High in next year's ANP.

C. ANNUAL MONITORING NETWORK PLAN CHECKLIST
(Updated October 1, 2015)

Year: 2015
Agency: Clark County DAQ

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM stations, and/or, in serious, severe and extreme ozone nonattainment areas, PAMS stations, and SPM monitoring stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of purposes for each monitor and evidence that siting and operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable." On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP process (items listed in Enclosure A).
Green	item requires attention in order to improve next year's plan (items listed in Enclosure B).

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?[1] If yes, page #s. Flag if incorrect[2]?	Does the information provided[3] meet the requirement?[4]	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1st	58.10 (a)(1)	Yes	Yes	Plan was received June 3, 2015
2.	30-day public comment / inspection period[5]	58.10 (a)(1), 58.10 (a)(2)	Yes; transmittal letter	Yes	No comments were received. Note, public inspection dates listed in the ANP on page 1 are incorrect.
3.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Yes, page 70	Insufficient Info	EPA is not approving the request to close criteria pollutant monitoring at Sunrise Acres and JD Smith and redeploy in a new location (June 2016). Please work with EPA on this request. EPA is also unable to approve the PM_{10} monitor deployment at Walter Johnson due to insufficient information on monitor type (i.e. SLAMS, SPM, etc.).
4.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Yes	Yes	• Redeploy O_3 at Indian Springs as SLAMS, see Row 80 below. • New SLAMS PM_{10} monitoring at South Las Vegas, see Row 78 below • New SLAMS O_3 and PM_{10} at Garrett Junior High, see Rows 78 below.
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		NA	NA	None
6.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes, pages 58-59	Yes	

[1] Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses "Incomplete" and "Incorrect" assume that some information has been provided.
[2] To the best of our knowledge.
[3] Assuming the information is correct
[4] Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.
[5] The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?[1] If yes, page #s. Flag if incorrect[2]?	Does the information provided[3] meet the requirement?[4]	Notes
7.	A plan for establishing a near-road $PM_{2.5}$ monitor (in CBSAs ≥ 2.5 million) by 1/1/2015 **(plan was due July 1, 2014)**	58.10(a)(8)(i)	Yes, page 73	Yes	DAQ anticipates having this monitor operational by January 1, 2017, as required.
8.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 2.5 million) by 1/1/2015 **(plan was due July 1, 2014)**	58.10(a)(7) 58.13(e)(1)	Yes, page 73	Yes	DAQ anticipates having this monitor operational by January 1, 2017, as required.
9.	NO_2 plan for establishment of 2nd near-road monitor by 1/1/2015 **(plan was due July 1, 2014)**	58.10 (a)(5)(iv)	Yes	Yes	Two near-road sites were approved by EPA as part of the 2014 ANP. Sites were required to begin operation by January 1, 2015. DAQ notes the Teddy and Rancho site started monitoring NO_2 in 2015 (page 45) and that the Central Fire Station site is anticipated to begin monitoring in 2015 (page 15). Please include exact start dates in next year's ANP.
10.	Precision/Accuracy reports submitted to AQS	58.16(a); App A, 1.3 and 5.1.1	Yes, page 5	Yes	
11.	Annual data certification submitted	58.15 App. A 1.3	Yes, page 5	Yes	
12.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included.[6]	58.11 (a) (2)	Yes, Appendix A, page A-10		Indian Springs and Logandale meet Appendix A and E, Spring Mountain Youth Camp is not operating as an FEM. Please include this information in the body of next year's ANP.
13.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met.[7]	58.20(c)	NA	NA	

[6] Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.
[7] This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?[1] If yes, page #s. Flag if incorrect[2]?	Does the information provided[3] meet the requirement?[4]	Notes
14.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	NA	NA	
GENERAL PARTICULATE MONITORING REQUIREMENTS (PM_{10}, $PM_{2.5}$, Pb-TSP, Pb-PM_{10})					
15.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	Need to determine collocation	Yes, Section 4	Yes	
16.	Distance between QA collocated monitors (Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.)	App. A 3.2.5.6 and 3.2.6.3	Yes, Section 4	No	Distance between QA collocated monitors: 3.7m at Jerome Mack ($PM_{2.5}$ FRMs) 4.6m at Sunrise Acres ($PM_{2.5}$ FRM and FEM) - Samplers measuring the same pollutant to fulfill QA collocation requirements should be between 1-4 m for lovol and 2-4m for highvol instruments.
17.	For low volume PM instruments (flow rate < 200 liters/minute), all other PM instruments are > 1 m from the lovol. If no, list distance (meters) and instruments.	App E	Yes, Section 4	Yes	Please list flow rates in next year's ANP
18.	For high volume PM instruments (flow rate > 200 liters/minute), all other PM instruments are > 2m from the hivol. If no, list distance (meters) and instruments.	App E	Yes, Section 4	Yes	Please list flow rates in next year's ANP
$PM_{2.5}$ –SPECIFIC MONITORING REQUIREMENTS					
19.	Document how states and local agencies provide for the review of changes to a $PM_{2.5}$ monitoring network that impact the location of a violating $PM_{2.5}$ monitor.	58.10 (c)	Yes, pages 58-59 and 73	Yes	

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?[1] If yes, page #s. Flag if incorrect[2]?	Does the information provided[3] meet the requirement?[4]	Notes
20.	Identification of any $PM_{2.5}$ FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) (Note 1: must include required data assessment.) (Note 2: Required SLAMS must monitor $PM_{2.5}$ with NAAQS-comparable monitor at the required sample frequency.)	58.10 (b)(13) 58.11 (e)	NA	NA	None requested
21.	Minimum # of monitoring **sites** for $PM_{2.5}$ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.7.1(a) and Table D-5	Yes, page 6	Yes	
22.	Requirements for continuous $PM_{2.5}$ monitoring (number of monitors and collocation)	App D 4.7.2	Yes, page 6	Yes	
23.	FRM/FEM/ARM $PM_{2.5}$ QA collocation	App A 3.2.5	Yes, page 9	Yes	
24.	$PM_{2.5}$ Chemical Speciation requirements for official STN sites	App D 4.7.4	NA	NA	
25.	Identification of sites suitable and sites not suitable for comparison to the annual $PM_{2.5}$ NAAQS as described in Part 58.30	58.10 (b)(7)	Yes, Section 4	Yes	
26.	Required $PM_{2.5}$ sites represent area-wide air quality	App D 4.7.1(b)	Yes, Section 4	Yes	
27.	For $PM_{2.5}$, within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App D 4.7.1(b)(1)	Yes, Section 4	Yes	Sunrise Acres is maximum concentration site
28.	Minimum monitoring requirement for near-road $PM_{2.5}$ monitor (in CBSA $\geq$ 2.5 million) by 1/1/2015	58.13(f)(1) App D 4.7.1(b)(2)	NA	NA	$PM_{2.5}$ near road monitoring will be required January 1, 2017
29.	If additional SLAMS $PM_{2.5}$ is required, there is a site in an area of poor air quality	App D 4.7.1(b)(3)	Yes, Section 4	Yes	J.D. Smith and Jerome Mack fulfill this requirement
30.	States must have at least one $PM_{2.5}$ regional background and one $PM_{2.5}$ regional transport site.	App D 4.7.3	Yes, Section 4	Yes	Jean is a background and transport site

	ANP requirement	Citation within 40 CFR 58	Was the information submitted?[1] If yes, page #s. Flag if incorrect[2]?	Does the information provided[3] meet the requirement?[4]	Notes
31.	Sampling schedule for $PM_{2.5}$ - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4) 58.12(d) App D 4.7 EPA flowchart	Yes, Section 4	Yes	
32.	Frequency of flow rate verification for manual $PM_{2.5}$ monitors audit	App A 3.3.2	Yes, Section 4	Yes	
33.	Frequency of flow rate verification for automated $PM_{2.5}$ monitors audit	App A 3.2.3	Yes, Section 4	Yes	
34.	Dates of two semi-annual flow rate audits conducted in **CY2014** for $PM_{2.5}$ monitors	App A, 3.2.4 and 3.3.3	Yes, Section 4	Yes	
PM_{10} –SPECIFIC MONITORING REQUIREMENTS					
35.	Minimum # of monitoring sites for PM_{10}	App D, 4.6 (a) and Table D-4	Yes, page 7	Yes	
36.	Manual PM_{10} method collocation (note: continuous PM_{10} does not have this requirement)	App A 3.3.1	NA	NA	All PM_{10} monitors are continuous
37.	Sampling schedule for PM_{10}	58.10 (b)(4) 58.12(e) App D 4.6	Yes, Section 4	Yes	All monitors are continuous
38.	Frequency of flow rate verification for manual PM_{10} monitors audit	App A 3.3.2	NA	NA	All monitors are continuous
39.	Frequency of flow rate verification for automated PM_{10} monitors audit	App A 3.2.3	Yes, Section 4	Yes	
40.	Dates of two semi-annual flow rate audits conducted in **CY2014** for PM_{10} monitors	App A, 3.2.4 and 3.3.3	Yes, Section 4	Yes	The dates for semi-annual flow audits at the Boulder City and Paul Meyer are technically not within the recommended 5-7 month range, but because the audits only missed this range by 5 and 1 day respectively, EPA believes these audits to meet the requirement.

Pb –SPECIFIC MONITORING REQUIREMENTS					
41.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5 58.13(a)	Yes, page 8	Yes	None required
42.	Pb collocation: for non-NCore sites	App A 3.3.4.3	NA	NA	
43.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	
44.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM_{10} in lieu of Pb-TSP	58.10 (b)(11)	NA	NA	
45.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Yes, pages 8, 25-30	Yes	Only NCore Pb is required
46.	Sampling schedule for Pb	58.10 (b)(4) 58.12(b) App D 4.5	Yes, page 27	Yes	1:6
47.	Frequency of flow rate verification for Pb monitors audit	App A 3.3.4.1	Yes, page 29	Yes	Performed monthly
48.	Dates of two semi-annual flow rate audits conducted in **CY2014** for Pb monitors	App A 3.3.4.1	Yes, page, 30	Yes	One performed each quarter of 2014
GENERAL GASEOUS MONITORING REQUIREMENTS					
49.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	Yes, Section 4	Yes	
50.	Date of Annual Performance Evaluation (gaseous) conducted in **CY2014**	App. A 3.2.2	Yes, Section 4	Yes	
O_3 –SPECIFIC MONITORING REQUIREMENTS					
51.	Minimum # of monitoring sites for O_3 [Note: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites][8]	App D, 4.1(a) and Table D-2	Yes, page 6	Yes	
52.	Identification of maximum concentration O_3 site(s)	App D 4.1 (b)	Yes, Section 4	Yes	

[8] Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements. In addition, ozone monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR 58 Appendix E, Table E-1) cannot be counted towards minimum monitoring requirements.

53.	Sampling season for O_3 (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4) App D, 4.1(i)	Yes, Section 4, page 35, and Appendix B; Letter from Stephen Deyo, DAQ to Jared Blumenfeld, EPA dated July 29, 2015	Insufficient Info	Appendix B includes an ozone season waiver letter from EPA dated March 8, 2012 which approves a shortened monitoring season at Apex and Mesquite sites. In last year's ANP review, EPA asked DAQ to include the information that continues to support a shortened ozone season and request renewal of the ozone season waiver. DAQ requested a renewal of this waiver on page 35 and attached the original approval letter in Appendix B. Additionally, in a letter from Stephen Deyo, DAQ to Jared Blumenfeld, EPA dated July 29, 2015, DAQ requested an ozone season waiver for the newly deployed SLAMS site at Indian Springs. EPA is unable to approve current waiver renewal requests for Apex and Mesquite. EPA notes that Indian Springs will continue to operate through the remainder of CY2015 and therefore, approval of the new waiver request for Indian Springs is not needed at this time. Please resubmit new waiver requests for these sites addressing the 2015 8-hour Ozone NAAQS.
NO_2 –SPECIFIC MONITORING REQUIREMENTS					
54.	Minimum monitoring requirement for single near-road NO_2 monitor (in CBSA $\geq$ 1 million) by 1/1/2014	58.13(c)(3) App D 4.3.2	Yes	Yes	EPA approved the selection of the near-road site at Teddy and Rancho Drive per the site selection as part of the 2014 ANP. The site started monitoring in 2015. Please include exact date of operation commenced in next year's ANP.
55.	Minimum monitoring requirement for second near-road NO_2 monitor (in CBSA $\geq$ 2.5 million) by 1/1/2015	58.13(c)(4) App D 4.3.2	Yes	No	EPA approved the selection of the Central Fire Station near-road site as part of the 2014 ANP. This requirement, however, is not fully met until operation of monitor begins. As of June 2015, the site had not begun operation.
56.	Minimum monitoring requirements for area-wide NO_2 monitor in location of expected highest NO_2 concentrations representing neighborhood or larger scale (operation required by January 1, 2013)	App D 4.3.3	Yes, page 7	Yes	One required, fulfilled by J.D. Smith and Sunrise Acres
57.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO_2 (operation required by January 1, 2013)	App D 4.3.4	Yes, page 7	Yes	One required, fulfilled by Sunrise Acres

58.	Identification of required NO_2 monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Yes, page 7	Yes	Identified as Sunrise Acres
CO –SPECIFIC MONITORING REQUIREMENTS					
59.	Minimum monitoring requirement for near-road CO monitor (in CBSA ≥ 2.5 million) by 1/1/2015	58.13(e)(1) App D 4.2.1	NA	NA	Near-road monitoring for CO required by 1/1/2017
SO_2 –SPECIFIC MONITORING REQUIREMENTS					
60.	Minimum monitoring requirements for SO_2 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Yes, page 7	Yes	
NCORE –SPECIFIC MONITORING REQUIREMENTS					
61.	NCore site and all required parameters operational: year-round O_3, trace SO_2, trace CO, NO_y, NO, $PM_{2.5}$ mass, $PM_{2.5}$ continuous, $PM_{2.5}$ speciation, $PM_{10-2.5}$ mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity, and Pb at CBSAs ≥ 500,000.	58.10 (a)(3); Pb collocation App. A 3.3.4.3; $PM_{10-2.5}$ minimum monitoring App. D 4.8; $PM_{10-2.5}$ sampling schedule 58.10 (b)(4) 58.12(f) App D 4.8; $PM_{10-2.5}$ collocation App. A 3.3.6	Yes, pages 25-30	Yes	
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
62.	AQS site identification number for each site	58.10 (b)(1)	Yes, Section 4	Yes	Please provide AQS IDs for South Las Vegas Valley and Garrett Junior High in next year's ANP.
63.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes, Section 4	Yes	
64.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes, Section 4	Yes	

65.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Section 4	Yes	
66.	Statement of purpose for each monitor	58.10 (a)(1)	Yes, Section 4	Yes	
67.	Basic monitoring objective for each monitor	App D 1.1 58.10 (b)(6)	Yes, Section 4	Yes	
68.	Site type for each monitor	App D 1.1.1	Yes, Section 4	Yes	
69.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Section 4	Yes	
70.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Yes, Section 4	Yes	
71.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Section 4	Yes	
72.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes, Section 4	Yes	
73.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes, Section 4	Incomplete	Please include exact start date of Teddy and Rancho and Central Fire Station sites.

74.	Distance of monitor from nearest road	App E 6	Yes	Yes	EPA notes that the following monitors were converted to middle scale: : • O_3 at Mesquite • NO_2 at Joe Neal
75.	Traffic count of nearest road	App E	Yes, page 5 and Section 4	Yes	
76.	Groundcover	App E 3(a)	Yes, Section 4	Yes	
77.	Probe height	App E 2	Yes, Section 4	Yes	
78.	Distance from supporting structure	App E 2	Yes, Section 4	Insufficient Info	The proposed South Las Vegas and Garrett Junior High SLAMS PM_{10} sites list distance from supporting structure as 1.2m (anticipated) and 1.5m (anticipated), respectively. This distance should be >2m.
79.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes, Section 4	Yes	
80.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes, Section 4	No, Insufficient Info	The JD Smith site does not meet App E 4(a). Please add obstruction height above probe to your description at the Indian Springs site.
81.	Distance from the drip line of closest tree(s)	App E 5	Yes, Section 4	Yes	
82.	Distance to furnace or incinerator flue	App E 3(b)	Yes, Section 4	Yes	
83.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes, Section 4	Yes	
84.	Probe material ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Section 4	Yes	
85.	Residence time ($NO/NO_2/NO_y$, SO_2, O_3; For PAMS: VOCs, Carbonyls)	App E 9	Yes, Section 4	Yes	

Public Comments on Annual Network Plan
Were comments submitted to the S/L/T agency during the public comment period?

No

If no, skip the remaining questions.
If yes:

- Were any of the comments substantive?
  - If yes, which ones?
  - Explain basis for determination if any comments were considered not substantive:
- Did the agency respond to the substantive comments?
  - If yes, was the response adequate?
- Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
  - If yes, provide rationale:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

January 12, 2015

Lewis Wallenmeyer, Director
Clark County, NV, Department of Air Quality
4701 W. Russell Road Suite 200
Las Vegas, NV 89118-2231

SUBJECT: Review of the Clark County Criteria Pollutant Quality Assurance Project Plan (EPA QA Office Document Control Number AIRP0323QV3)

Dear Mr. Wallenmeyer:

Thank you for submitting your Criteria Pollutant Quality Assurance Project Plan (QAPP) for ambient air monitoring of Particulate Matter (PM), Ozone (O_3), Nitrogen Dioxide (NO_2), Carbon Monoxide (CO), and Lead (Pb). U.S. EPA (EPA) has reviewed this revised document and is approving it for criteria pollutant monitoring. All previous concerns were addressed and their resolutions are attached. Several additional comments are included for your consideration.

This review was based on regulation and guidance provided in "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations" (EAP QA/R-5, March 2001), "Guidance for the Data Quality Objectives Process (EPA QA/G-4, February 2006), and the QA Handbook for Air Pollution Measurement Systems, Volume II (EPA-454/b-13-003, May 2013).

If you have any questions regarding QA requirements for ambient air monitoring, please contact Mathew Plate, EPA Region 9 QA Office at (415) 972-3799.

Sincerely,

Eugenia McNaughton

Eugenia McNaughton, Ph.D.
Manager, Quality Assurance Office (MTS-3)
Management and Technical Services Division

Major Concerns

1. **[General, Method Quality Objectives/Quality Control; Section A7.4, Data Quality] Details of quality control measures and criteria are not fully summarized in this QAPP and the associated standard operating procedures (SOPs). In addition to references to EPA regulation and guidance, quality control criteria should be specified. This QAPP and the associated SOPs should be stand-alone documents describing quality control measures and criteria undertaken and that can easily be referenced by the user. These documents should also substantiate that the program is following and is committed to following appropriate quality control. Clark County Department of Air Quality (DAQ) could establish most of these by including the appropriate tables, modified as needed, from the *QA Handbook for Air Pollution Measurement Systems, Volume II*, Appendix D, and referencing these in the QAPP.**

   This concern was addressed. Quality control is summarized in the templates in Appendix C. Please note that the Table of Contents was not updated and still lists Appendix C as "LEADS Data Collection Model." It is also recommended that Section D3 (Data Validation) include a reference to Appendix C.

2. **[General, Data Handling, Management, and Validation] Throughout this QAPP and associated SOPs, clear instructions are given on how quality control information and data processed by the Leading Environmental Analysis and Display System (LEADS) are handled. However, data collected outside the LEADS (i.e., manual filter data) and quality control to support data collected by the LEADS (i.e., automated PM flow/temperature/pressure checks and automated particulate and gaseous performance audit data) are not well defined in this QAPP and the associated SOPs. This plan should explain how this information is managed, validated, and associated to the related data in the LEADS pertaining to data review, data validation, and uploading into AQS.**

   This concern was addressed. Information was added to the QAPP that clarifies data management. DAQ should ensure that associated SOPs reflect non-LEADS data management when they are routinely updated.

3. **[Section C1.2, Performance Evaluations; SOP 101, SOP for Quality Assurance Field Audits and Corrective Action Requests] Section C1.2 has limited information on the type, frequency, and extent of performance audits conducted by the DAQ independent auditor. While a reference to regulatory requirements is provided, the QAPP and associated performance audit SOP should include specifics on these audits such that conformance to regulatory requirements can be confirmed. At a minimum, the QAPP should include a discussion accompanied by a table listing the audits performed, measurements collected during each audit, frequency of audits, information on the equipment used to perform audits, and the criteria for evaluating audit results. The associated SOP should include step-by-step**

performance audit procedures for each type of audit performed with specific requirements for each instrument.

This concern was addressed. Section C1.2 was expanded to include details of the performance evaluation program.

4. **[Section B7.2, Gas Analyzer Calibration; Table 12, Gas Analyzer QC Checks; Appendix F, Section 3.0, Calibration and Span Check Sequences and Calculating Pollutant Concentration Generated by the Calibration System] The low calibration levels and precision levels used are programed into the LEADS to be conducted at 18% of full scale. This translates to 9 ppm for carbon monoxide (CO) and 0.09 ppm for nitrogen dioxide (NO2) and ozone (O_3). For O_3 calibrations, this concentration is above the 8-hour NAAQS and should be lowered so that the calibration range brackets the NAAQS concentration (some Region 9 agencies have a low calibration point for O_3 around 0.050 ppm). Additionally it is recommended that these low calibration / precision point levels be lowered for each of these gaseous pollutants to be consistent with 40 CFR Part 58, Appendix A, Section 3.2.1, which states, "*The QC check gas [precision] concentration selected should be related to the routine concentrations normally measured at sites within the monitoring network in order to appropriately reflect the precision and bias at these routine concentration ranges.*"**

   This concern was addressed. DAQ lowered the low level calibration and precision concentrations. It is recommended that DAQ evaluate potential data impacts that may result if concentrations higher than EPA's decision thresholds are used. This could be done by reviewing low concentration audit data, including National Performance Audit Program (NPAP) audit results.

5. **[Section A9.2, Records Management] This section states that exposed, low-volume filters will be archived for one year or longer. However 40 CFR Part 58, Section 58.16, directs filters to be stored for a minimum of 5 years, the first 12 months in "cold storage."**

   This concern was addressed. The plan clarifies that filters are stored frozen for one year and for four years after that in a controlled environment.

Other Concerns

1. **[Section A4, Project Task Organization; Figure 1, DAQ Monitoring Division Organization Chart] The organizational structure defined in Section A4 and in Figure 1 should be updated to reflect the current organization and staffing changes. Figure 1 is not consistent with the DAQ organizational chart that is currently on the Departmental website and both of these are inconsistent with the organizational chart provided in the NCore and Meteorology QAPP submitted to EPA. If the DAQ has a project-specific organization that is different than the departmental organization this should be discussed in the QAPP.**

This concern was partially addressed. The chart provided reflects the current organization of DAQ. However, the plan states that this is subject to change. For quality management purposes, having a stable organization structure helps provide data consistency. During the next scheduled technical systems audit (TSA), EPA will evaluate DAQ's updated organizational structure to determine whether the changes have impacted data quality or consistency.

2. **[Section A6.2; Air Quality Monitoring Network] The discussion of collocated monitoring notes that there are two continuous $PM_{2.5}$ Federal Equivalent Method (FEM) monitors collocated with filter-based Federal Reference Method (FRM) monitors. However, only one of the continuous FEM monitors is designated as a primary monitor in the QAPP. This is inconsistent with EPA's $PM_{2.5}$ collocation requirements and also does not match what is presented in the Clark County 2014 Network Design Plan. It is recommended that DAQ re-evaluate $PM_{2.5}$ collocation requirements and update the QAPP and Network Design Plan accordingly.**

   This concern was addressed. The plan clarifies that FEM monitor at the Jerome Mack site is not a primary FEM and it therefore not officially collocated.

3. **[Section A7.1, Developing Data Quality Objectives] This section should introduce information inputs and boundaries that require different quality assurance approaches. Specifically, temporal boundaries should be discussed. NAAQS decisions require quarterly and annual data reporting requirements and involve evaluating up to three years of data. Real time and AQI decisions require that data have hourly reporting requirements and decisions are made on an hourly and daily basis. These different boundaries/requirements lead to the different quality assurance steps integrated into DAQ's monitoring system.**

   This concern was addressed. A reference to Section A7.2 was added to Section A7.1 and some additional information on temporal boundaries was added to Section A7.2. In addition, the QAPP and SOPs define clearly how quality is managed given the different time scales.

4. **[Section A8, Special Training/Certification] Section A8 should include training on this QAPP and relevant SOPs for DAQ staff. It is recommended that this training be tracked for each staff person and updated periodically.**

   This concern was addressed. Information on training, including training on DAQ QA plans and SOPs has been added to Section A8.

5. **[Section B9, Non-direct Measurements] This section should include a provision for evaluating data quality if an occasion arises where secondary data are used.**

   This concern was addressed. Language was added that commits the organization to further evaluation prior to using secondary data.

Lewis Wallenmeyer
January 12, 2015
Clark County Criteria Pollutant QAPP

Additional Comments

1. [Section A6.2, Air Quality Monitoring Network] Some of the language in this section is outdated, referencing a future near-road station in 2014 and the 2014 Annual Network Plan as a future document.

2. [B3.1, Federal Reference Method Filters] The filter holding time, "37 days," should read "30 days" in Section B3.1. It is correct in other parts of the QAPP and related SOPs.

3. [Table 11, MQO for QC Verification and Span Checks] This table indicates that annual multipoint checks are for temperature and pressure. Other parts of the plan indicate that multipoint flow is also conducted. Please note that 40 CFR Part 50 Appendix L, Section 9.1.1 states that for $PM_{2.5}$ "multipoint calibration and single-point verification of the sampler's flow rate measurement device must be performed periodically."

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

October 30, 2015

Lewis Wallenmeyer, Director
Clark County, NV, Department of Air Quality
4701 W. Russell Road Suite 200
Las Vegas, NV 89118-2231

SUBJECT: Review of the Clark County Quality Assurance Project Plan for Meteorology and NCORE Air Quality Monitoring (EPA QA Office Document Control Number AIRP0324QV2)

Dear Mr. Wallenmeyer:

Thank you for submitting your Quality Assurance Project Plan (QAPP) for Meteorology and NCORE Air Quality Monitoring which addresses the following measurements: ambient air monitoring of particulate matter (including fine and coarse fractions and speciated particulate); trace sulfur dioxide (SO_2); total reactive nitrogen oxides (NOy); trace carbon monoxide (CO); lead (Pb); wind speed; wind direction; air temperature; barometric pressure; precipitation; and relative humidity. U.S. EPA (EPA) has reviewed this document and is conditionally approving it for monitoring. The Department should continue to improve, complete, and clarify their procedural instructions and documentation, and several tasks specific to NCORE monitoring should be clarified. Please respond to the outstanding issues by January 15, 2016 so that EPA may remove "conditional" from the approval.

This review was based on regulation and guidance provided in "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations" (EAP QA/R-5, March 2001), "Guidance for the Data Quality Objectives Process (EPA QA/G-4, February 2006), and the QA Handbook for Air Pollution Measurement Systems, Volume II (EPA-454/b-13-003, May 2013).

If you have any questions regarding QA requirements for ambient air monitoring, please contact Mathew Plate, EPA Region 9 QA Office at (415) 972-3799.

Sincerely,

Eugenia McNaughton

Eugenia McNaughton, Ph.D.
Manager, Quality Assurance Office (EMD 2-2)
Scientific Services Branch
Environmental Management Division

Concerns

1. [Standard Operating Procedures (SOPs)] Clark County Department of Air Quality (DAQ) has changed how procedures are documented recently. These changes are not fully implemented or reflected in the QAPPs. SOPs have been made more generic with procedural details presented in "Guides," "Schedules," and "Trainings." The following should be completed:
    a. Include a section in the QAPP that discusses how these documents are used.
    b. Finalize the documents, and assign all documents categories, dates, and version numbers.
    c. Evaluate all procedures where documentation is needed to clarify, instruct, or document how DAQ carries out its work. Incorporate them into appropriate documents (See Concern 2 and 4).
    d. Where supporting SOPs and guides reference other documents, review the references to make sure that they are updated to avoid confusion.
    e. Consider developing a guide and/or SOP that summarizes all the SOPs, Guides, Schedules, and Trainings currently available. This document would be updated every time a new document or revision is created.

2. [General, Procedures for Trace Sulfur Dioxide(SO_2), Carbon Monoxide(CO) and Reactive Nitrogen Oxides(NOy)] This QAPP and its supporting documents do not include sufficient information about the operation of the trace level instruments used at the NCORE monitoring station. A discussion of trace calibration, quality control, and audit levels and special requirements for the NCORE network should be included in the QAPP, existing, and/or new documents. Some examples include:
    a. Quality control criteria exceptions for trace precision and audit levels.
    b. Detection limit evaluations.
    c. Evaluation of NOy converter efficiency, including testing with gases other than NO_2.
    d. Special Zero Air requirements for NCORE monitoring.
    e. Special residence time requirements for NOy.
    f. Special requirements for thermal stability of NCORE instruments (especially CO).
    g. Specific forms and/or electronic record used for performing NCORE operations.

3. [QAPP, Table 3, Precision and Bias MQO] Table 3 presents precision and bias method quality objectives (MQOs) for NCORE monitoring. These are also presented in DAQ's MQO Guide (4/23/15). Because SO_2 and CO are being monitored using Federal Equivalent Method (FEM) monitors, the national MQOs should be applied to these methods (10% instead of 15%). However exceptions to this requirement may be made at trace level concentrations.

4. [QAPP, Table 12, MQO for QC Verification Checks of Air Quality Analyzers and Samplers] Table 12 appears to be a carryover from the criteria pollutant QAPP. It should be updated to reflect NCORE pollutants and criteria. For example, this table does not address NOy and SO_2.

5. [General, Forms and Documentation] The SOPs and Guides provided include instructions for network operations. However the instructions are not always clear as to how activities are documented. There are only limited examples of the forms or electronic systems used to document activities. This information should be expanded in the supporting documentation and in operational instructions.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

March 27, 2014

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Mike Sword
Engineering Manager
Clark County Department of Air Quality
4701 W. Russell Road, Suite 200
Las Vegas, Nevada 89118

Dear Mr. Sword:

This letter transmits our approval of Clark County's NCore station at the Jerome Mack site, AQS # 32-003-0540, as required by the Ambient Air Monitoring Regulations. According to these rules (see 40 CFR 58.11(c)), NCore network design and changes must be approved by the Environmental Protection Agency's (EPA) Administrator. This authority has been delegated to the Director of the Air Quality Assessment Division in EPA's Office of Air Quality Planning and Standards.

In considering your proposed NCore monitoring station, we worked with your Regional Office on a review of your annual monitoring network plan and an assessment of the proposed location and characteristics of the area to be monitored. Region 9 staff inspected the Jerome Mack site and location in March of 2011. Region 9 reported to us that the site meets all siting criteria. Also, the location appears to be consistent with the network design criteria for urban NCore stations. Therefore, after careful consideration of your proposal, we are pleased to approve this station as part of the NCore network.

In reviewing the reporting of data and metadata information identified in the AQS database for the Jerome Mack site, we see that your agency is successfully measuring and reporting all the required NCore parameters for this site. Additionally, we note that your agency has been successfully reporting data since the required beginning of the NCore program in January of 2011.

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Thank you for your program's efforts in developing the NCore station, establishing the site, and successfully reporting the data for all the required parameters. For questions you may contact Tim Hanley at hanley.tim@epa.gov and 919-541-4417.

Sincerely,

Richard A. Wayland
Director
Air Quality Assessment Division

cc: Matthew Lakin, EPA Region 9
Meredith Kurpius, EPA Region 9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

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2012 DEC 18 A 9:25

November 28, 2012

Mr. Lewis Wallenmeyer, Director
Clark County Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, NV 89118-2231

SUBJECT: Quality Management Plan (QMP) for the Clark County Department of Air Quality, Las Vegas, Nevada (QA Program Document Control Number AIRP0279PV1)

Dear Mr. Wallenmeyer:

Thank you for submitting the Quality Management Plan for the Clark County Department of Air Quality (CCDAQ), dated September 28, 2012, as well as a Response to Comments (RTC) Letter and Quality Management Plan Review Checklist, all prepared by the Engineering Division. The QMP is a revised document prepared in response to Findings provided in EPA's April 2, 2010, Technical Systems Audit (TSA) Report. The TSA Findings contained specific comments on Clark County's QMP, which were included in the RTC and used as the basis for this review. In addition, the Quality Assurance Office and Air Division reviewed the subject document based on "EPA Requirements for Quality Management Plans," EPA R-2, December, 2001 (EPA/240/B-01/002).

The QMP addresses most of the concerns identified in the TSA QMP review and is conditionally approved by the Quality Assurance Office and the Air Quality Analysis Office. Additional information is needed regarding the subjects of Assessments, Validation, Data Certification and Data Quality Objectives (DQOs). Elements that should be expanded or strengthen are identified below. Work also should continue on the revision to the supporting Quality Assurance Project Plans/Quality Control and Assurance System (QAPPs/QCAS) documents identified in Section 1.2, Scope, which have not yet been approved by EPA.

If you have any questions concerning this memorandum, please call David Taylor of the QA Office at (415) 972-3803 or by email at Taylor.David@epa.gov.

Sincerely yours,

Eugenia McNaughton

Eugenia McNaughton, Ph.D., Manager
Quality Assurance Office

Clark County DAQ QMP1.docx

Concerns

1. [Section 1.1.2, Assessment] Information regarding assessments have been added to several parts of the plan, but there is no detailed discussion of this topic. The EPA R-2 guidance includes a section on "Assessment and Response." It is recommended that such a section be added. Section 1.7, Continuous Improvement, satisfactorily defines "Assessment" in generic terms, but the example provided in this section is limited. The QMP should provide a more comprehensive perspective on CCDAQ's assessment program. The TSA Findings stated that both Assessment and Response (including internal and EPA technical and performance assessments) were to be described. In addition, Section 6 makes reference to participation in EPA's National Performance Audit Program (NPAP) and the Particulate Matter Performance Evaluation Program (PEP), but the frequency and nature of this participation and of internal performance audits should be described in greater detail. The response program should also be discussed. Note that the technical aspects of the program, including acceptance criteria, etc., can be deferred to the QA Program Plan or QA Project Plan level. A statement should be included to this effect.

2. [Section 10.2.2] The QMP states that the Data Specialist validates data by using the validation function in LEADS to review collected data for errors flags, outliers, and statistical anomalies. He/she may also review electronic logs, instrument operation metadata, and instrument verifications and calibrations, or discuss data with the QC Technician as part of the validation process. If the Data Specialist invalidates data, all changes are logged by LEADS with comments and error codes. The QMP should discuss the role of the QA Manager in the data validation process. The QMP should also include a statement that a more detailed discussion of validation can be found in the QA Program Plan or QA Project Plans for the different pollutants, or in appropriate Standard Operating Procedures. For example, the latter documents would discuss CCDAQ's criteria with respect to the acceptance, flagging, or rejection of data.

3A. [Section 3.0, User Requirements] This section indicates that EPA is the primary data user for air monitoring data, but does not state that it is the exclusive data user. If CCDAQ will also be using the data for its own internal purposes, then the discussion of DQOs should be expanded to discuss how they will be developed or indicate where this discussion will be found (for example, in a QA Program Plan or pollutant specific QAPPs).

3B. The statement that "planning and response efforts work together to reconcile reported data and ensure that they satisfy all EPA requirements which 40 CFR 58 defines as DQOs," is confusing. The DQOs defined in 40 CFR 58 were developed as a result of a systematic planning process. The data generated through monitoring must be reconciled with these DQOs before they can be certified and entered into AQS. It is recommended that the statement be rephrased.

4. [Section 5.0, User Requirement Reconciliation (Quality Control)] This section makes reference to QAPP/QCAS that are used in planning. It is recommended that the list of QAPP/QCAS documents provided in Section 1.2 be included here.

5A. [Section 9.1, Data Certification] The discussion of data certification should be expanded to describe the review and validation steps that CCDAQ takes before data are certified.

5B. The Quality Systems Manager is not shown in either of the organization charts in Section 4.1, Organization. Is this the Engineering Division Manager? This should be clarified.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

FEB 29 2016

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 serves as an approval for your request dated February 8, 2016 for a waiver to suspend operation of three Clark County Air Quality Department (DAQ) State or local air monitoring stations (SLAMS) ozone sites (Apex – Air Quality System (AQS) ID 32-003-0022, Mesquite – AQS ID 32-003-0023, Indian Springs – AQS ID 32-003-7772) from October 1, 2015 through March 31, 2016 and October 1, 2016 through March 31, 2017. Per 40 CFR Part 58, Appendix D Section 4.1(i), monitoring agencies must have ozone season deviations approved by the U.S. Environmental Protection Agency (EPA), documented in the Annual Ambient Air Quality Monitoring Network Plan, and updated in EPA's AQS database. With this letter, EPA also re-affirms the past ozone season waiver dates (October-March) for the Apex and Mesquite monitoring sites in accordance with the March 8, 2012 EPA ozone season waiver approval letter. Please note that an updated request with updated 2016 data will be required for future ozone season waiver approvals after March 31, 2017.

The continuing record of data from DAQ sites shows a low probability that these sites would measure an exceedance of the 2015 8-hour Ozone National Ambient Air Quality Standard (NAAQS) during these winter months. The past five years of data show no exceedances of the 2015 8-hour Ozone NAAQS for ozone at any DAQ monitors during the months of October through March. In addition, DAQ will continue to operate ozone monitors at 9 sites throughout the waiver period. Please attach this approval letter and update the relevant monitor and site information in your next Annual Ambient Air Quality Monitoring Network Plan.

If you have any questions, please contact me at (415) 947-4534 or Jennifer Williams of my staff at (415) 972-3938. Thank you for your continued attention to detail and thorough data analyses.

Sincerely,

Meredith Kurpius
Manager, Air Quality Analysis Office

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