[Bracketed and-strikethrough] material is that portion being deleted Underlined and italicized material is that portion being added

<u>Underlined and italicized</u> material is that portion being added
BILL NO. <u>11-19-24-2</u>
SUMMARY - An ordinance to repeal Clark County Air Quality Regulations Section 50, "Storage of Petroleum Products," and Section 51, "Petroleum Product Loading into Tank Trucks and Trailers."
ORDINANCE NO. 5197 (of Clark County, Nevada)
AN ORDINANCE TO REPEAL CLARK COUNTY AIR QUALITY REGULATIONS SECTION 50, "STORAGE OF PETROLEUM PRODUCTS," AND SECTION 51, "PETROLEUM PRODUCT LOADING INTO TANK TRUCKS AND TRAILERS"; AND PROVIDING FOR OTHER MATTERS PROPERLY RELATED THERETO.
NOW, THEREFORE, THE CLARK COUNTY BOARD OF COUNTY COMMISSIONERS DOES HEREBY ORDAIN AS FOLLOWS:
SECTION 1. Clark County Air Quality Regulation Section 50, "Storage of Petroleum Products," is hereby repealed in its entirety as reflected in Exhibit 1, attached hereto.
SECTION 2. Clark County Air Quality Regulation Section 51, "Petroleum Product Loading into Tank Trucks and Trailers," is hereby repealed in its entirety as reflected in Exhibit 2, attached hereto.
SECTION 3. If any section of this ordinance, or portion thereof, is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such holding shall not invalidate the remaining parts of this ordinance.
SECTION 4. All ordinances, parts of ordinances, chapters, sections, subsections, clauses, phrases, or sentences contained in the Clark County Code in conflict herewith are hereby repealed.
/// /// ///

SECTION 5. This ordinance shall take effect and be in force from and after its passage and the publication thereof by title only, together with the names of the County Commissioners voting for or against its passage, in a newspaper published in and having a general circulation in Clark County, Nevada, at least once a week for a period of two (2) weeks.

PROPOSED on the	e 19th day of November	, 2024.
PROPOSED BY:	Commissioner <u>Tick Segerblom</u>	
PASSED on the	3rd day of December	, 2024.
AYES:	Tick Segerblom	
	William McCurdy II	
	James B. Gibson	
	Marilyn K. Kirkpatrick	
	Ross Miller	
	Michael Naft	
NAYS:	None	

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	BOARD OF COUNTY COMMISSIONERS
	CLARK COUNTY, NEVADA
	By:
	TICK SEGERBLOM, Chair
ATTEST:	TICK SECENDEDIVI, CIMI
Care Bath for	
LYNN GOYA, County Cler	rk

EXHIBIT 1

SECTION 50 - STORAGE OF PETROLEUM PRODUCTS

- 50.1 A PERSON shall not place, store, nor hold in any stationary tank, reservoir or other container of more than 151,412 liters (40,000 gallons) capacity of any petroleum liquid having a VAPOR pressure of 78 mm Hg (1.5 pounds per square inch absolute) or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon VAPOR or gas loss into the atmosphere, or unless it is designed and equipped with one of the following VAPOR LOSS CONTROL DEVICES, properly installed, and in good working order and operation:
- A floating roof, consisting of a pontoon type or double-deck type roof, resting on the surface of the liquid contents and equipped with a closure seal, to close the space between the roof edge and the tank wall. The control equipment provided for herein shall not be used if the petroleum product has a VAPOR pressure of 572 mm Hg (11.0 pounds per square inch absolute) or greater under actual storage conditions. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place;
- 50.1.2 A vapor recovery system, consisting of a vapor gathering system capable of collecting the hydrocarbon vapors and gases so as to prevent their EMISSION to the atmosphere, and with all tank gauging and sampling devices gas tight, except when gauging or sampling is taking place;
- 50.1.3 Other equipment of equal efficiency, provided such equipment has first been submitted to and approved by the CONTROL OFFICER.
- 50.2.1 There shall be no visible holes, tears or other openings in the seal or seal fabric of the tank reservoir or other container for the storage of petroleum liquids.
- All openings, except stub drains, are to be equipped with a cover, seal or lid. The cover, seal or lid is to be in a closed position at all times except when the device is in actual use. Automatic bleeder vents are to be closed at all times except when the roof is floated off or landed on the roof leg supports. Rim vents, if provided, are to be set to open when the roof is floated off the roof leg supports or at the manufacturer's recommended setting.

History: Amended: December 28, 1978; June 11, 2001; June 3, 2003; July 1, 2004.

EXHIBIT 2

<u>SECTION 51 - PETROLEUM PRODUCT LOADING INTO TANK TRUCKS</u> AND TRAILERS

- 51.1 A PERSON shall not load any petroleum product having a VAPOR pressure of 78 mm Hg (1.5 psia) or greater into any tank truck, trailer, or tank car from any loading facility dispensing 18925 kiloliters (5,000,000 gallons) annually unless such loading facility is equipped with a VAPOR collection and disposal system or its equivalent, properly installed, in good working order and in operation.
- No person shall load any petroleum product having a vapor pressure of 78 mm Hg (1.5 psia) or greater into any tank truck, trailer or tank car from any loading facility dispensing less than 18925 kilo liters (5,000,000 gallons) annually unless such loading equipment is designed for bottom loading only or uses a submerged fill tube extending to within 76.2 mm (3 inches) of the bottom of the tank being filled.
- 51.2 When loading is effected through the hatches of a tank truck or trailer with a loading arm equipped with a VAPOR collecting adaptor, a pneumatic, hydraulic or other mechanical means shall be provided to force a vapor-tight seal between the adaptor and the hatch. A means shall be provided to prevent liquid gasoline drainage from the loading device when it is removed from the hatch of any tank truck or trailer, or to accomplish complete drainage before such removal.
- 51.3 When loading is effected through means other than hatches, all loading and VAPOR lines shall be equipped with fittings which make vapor-tight connections and which close automatically when disconnected.
- **51.4** The VAPOR disposal portion of the system shall consist of one of the following:
- 51.4.1 A vapor-liquid absorber system with a minimum recovery efficiency of 90 percent by weight of all the hydrocarbon vapors and gases entering such disposal system;
- 51.4.2 A variable VAPOR space tank, compressor, and FUEL gas system of sufficient capacity to receive all hydrocarbon vapors and gases displaced from the tank trucks and trailers being loaded;
- 51.4.3 Other equipment of at least 90 percent efficiency provided such equipment is submitted to and approved by the Air Quality CONTROL OFFICER.
- 51.5 The loading shall be accomplished in such a manner that the mixture of vapor and air displaced from the delivery vessel will be vented only to the vapor recovery system.

History: Amended: December 28, 1978; June 11, 2001; June 3, 2003; July 1, 2004.

TECHNICAL SUPPORT DOCUMENT FOR REPEALING AIR QUALITY REGULATIONS SECTION 50, "STORAGE OF PETROLEUM PRODUCTS," AND SECTION 51, "PETROLEUM PRODUCT LOADING INTO TANK TRUCKS AND TRAILERS"

Background

On September 17, 2024, the Board of County Commissioners approved amendments to Clark County Air Quality Regulations (AQRs) Section 13, "National Emission Standards for Hazardous Air Pollutants" (NESHAP), and Section 14, "New Source Performance Standards" (NSPS). The new amendments included subsections 13.3 and 14.2, which will be included in the Nevada State Implementation Plan (SIP) to satisfy federal obligations to reduce volatile organic compounds in a moderate nonattainment area for ozone. These sections regulate petroleum storage tanks, bulk gasoline plants and terminals, and associated equipment leaks. AQR Sections 50, "Storage of Petroleum Products," and 51, "Petroleum Product Loading into Tank Trucks and Trailers," have become obsolete with the adoption of the new subsections 13.3 and 14.2, thus should be repealed. The new regulations are at least as stringent as AQRs 50 and 51 and improve rule effectiveness by promoting consistency and thoroughness in compliance obligations, including the addition of (as applicable) comprehensive monitoring, recordkeeping, and reporting requirements.

SIP Requirements and Submittal

Upon approval of the ordinance, the Division of Air Quality (DAQ) will submit a request to the Nevada Division of Environmental Protection that the U.S. Environmental Protection Agency (EPA) rescind AQRs 50 and 51 from the SIP and replace them with subsections 13.3 and 14.2. These requirements will strengthen the SIP and satisfy requirements from Sections 110(l) and 193 of the Clean Air Act (Act).

Replacement of AQRs 50 and 51 in the SIP

Replacement of AQR 50

SIP-approved AQR 50 requires 40,000-gallon or larger tanks storing petroleum liquid with a vapor pressure of 78 mm Hg or more to equip the tank with a vapor recovery system or floating roof unless the tank is pressurized. The regulation includes provisions for reducing equipment leaks, though there is no requirement to use double seals. After EPA approval, subsections 13.3 and 14.2 will replace AQR 50 in the SIP by incorporating by reference Subparts K, Ka, and Kb of Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60 (federal NSPS) and 40 CFR Part 63, Subpart BBBBBB (federal NESHAP).

Although there are some differences in the applicability elements of the NSPS/NESHAP and AQR 50, DAQ has determined that adopting this group of federal regulations fills the gaps left by any individual one: for example, 40 CFR Part 60, Subpart Kb exempts bulk gasoline plants from its requirements, but 40 CFR Part 63, Subpart BBBBBB regulates such tanks with

requirements more stringent than AQR 50; and though Subpart BBBBB exempts aviation fuel loading at airports, DAQ will regulate these activities under AQR 102.

DAQ has determined that 40 CFR Part 60, Subparts K, Ka, and Kb and 40 CFR Part 63, Subpart BBBBBB represent the most current assessment of emissions control capabilities that will meet the best available system of emissions reduction under Section 111 of the Act and maximum achievable control technology under Section 112 of the Act. Together these standards exceed the statutory requirement for Control Technique Guidelines Reasonably Available Control Technology (CTG RACT). In addition, the federal regulations are written more clearly than AQR 50 and include more comprehensive compliance obligations. Table 1 shows how the federal regulations are as or more stringent than AQR 50 and meet presumptive RACT for CTG source categories.

Table 1. Comparison of Federal Rules to AQR 50 and Presumptive RACT

Construc. / Reconstruc. Date	Reg. Citation (40 CFR)	Requirement General Exemptions		AQR 50 Comp.	CTGs Comp.	
3/6/74–5/19/78	§ 60.112: Storage	If true vapor pressure of >78 mm Hg (1.5 psia) but <570 mm Hg (11.1 psia), equip with floating roof, vapor recovery system, or equivalent	Storage vessels for petroleum or condensate stored, processed, and/or treated at a	Meets AQR 50.1 applicability threshold and control and vapor pressure	Meets or exceeds internal or external floating roof and seal requirement	
6/11/73–5/19/78	Vessels			requirements, exemption not relevant to HA 212	and presumptive RACT includes similar exemption	
5/19/78–7/23/84*	§ 60.112a: Storage Vessels	If true vapor pressure of >10.3 kPa (1.5 psia) but <76.6 kPa (11.5 psia), equip with external floating roof meeting specs, fixed roof with internal floating roof meeting specs, or vapor recovery system If true vapor pressure of the petroleum liquid >76.6 kPa (11.1 psia), equip with vapor recovery system meeting 95% reduction by weight	Each petroleum liquid storage vessel < 1,589,873 liters (420,000 gallons) used for petroleum or condensate stored, processed, or treated before custody transfer to unaffected facility	Meets AQR 51.1 applicability threshold, vapor pressure, and control requirements	Meets or exceeds internal or external floating roof and seal requirement and presumptive RACT includes similar exemption	

Construc. / Reconstruc. Date	Reg. Citation (40 CFR)	Requirement	General Exemptions	AQR 50 Comp.	CTGs Comp.	
7/24/84 and after	Vessel either with a design capacity >151 (39,890 gal) containin VOL with max true value pressure >5.2 kPa but <76.6 kPa or with a design capacity >75 method but <151 m³ containin VOL with maximum true vapor pressure >27.6 but <76.6 kPa, equip vapor pressure >27.6 but <76.6 kPa, equip vapor fixed roof and internal floating roof, external floating roof, or closed vent system with continuous vent system with continuous device with 95% efficients.		Capacity ≥ 51 m³ storing a liquid with a maximum true vapor pressure <3.5 kPa or with a capacity >75 m³ but <151 m³ storing a liquid with a maximum true vapor pressure <15.0 kPa	More stringent than AQR 50's applicability and control requirements. Although AQR 50 does not exempt bulk gasoline plants, these will be regulated under Subpart BBBBBB	Meets or exceeds presumptive RACT controls, but CTGs do not discuss	
	Vessels	Vessel with a design capacity >75 m³ which contains a VOL with maximum true vapor pressure >76.6 kPa, equip with closed vent system and 95% control or equivalent	Vessels located at bulk gasoline plants; vessels at gasoline service stations, vessels subject to 40 CFR Part 63, Subpart GGGG	More stringent than AQR 50's applicability by specifying control efficiency of vapor control system. Although AQR 50 does not exempt bulk gasoline plants, these will be regulated under Subpart BBBBBB	exemption for bulk gasoline plants	
None	§ 63.11086: Bulk Gasoline Plant Loading Tanks and Trucks	If >250 gal, load tank or truck using submerged fill that meets specs by date installed; all tanks, minimize gasoline spills and follow other work practices (such as monthly leak inspection)	Gasoline storage tanks used only for dispensing gasoline in a manner consistent with tanks located at a gasoline station are not subject to any of the requirements in this subpart but must comply with subpart CCCCCC	Meets AQR 51.1.1 submerged fill requirement	Meets presumptive RACT control Option 1	
	§ 63.11087 & Table 1: Bulk Gasoline Terminal Storage Tanks	If gasoline storage is <75 m³ or <151 m³ and throughput <480 gal/day, equip with fixed roof and set pressure relief valves to >18" water	Aviation fuel loading at airports and marine tank loading	Exceeds AQR 50.1 40,000-gal applicability threshold and imposes controls not required by AQR 50. AQR 50 does not exempt airports, but they are regulated under AQR 102. Marine tank loading exemption not relevant to HA 212	Tanks not covered by presumptive RACT because they are below applicability threshold	

Construc. / Reconstruc. Date	Reg. Citation (40 CFR)	Requirement	General Exemptions	AQR 50 Comp.	CTGs Comp.
	§ 63.11087 & Table 1: Bulk Gasoline Terminal Storage Tanks	If gasoline storage tank >75 m³, equip with close vent system with 95% control by weight, internal floating roof, or external floating roof; surge control tanks, fixed roof with pressure vacuum vent with pressure >0.5" water	Bulk gasoline terminal not subject to controls in Subparts R or CC of § 63 (Subpart R provides equation for exemption but Subpart CC would likely cover all CTG tanks)	Exceeds AQR 50.1 40,000-gal applicability threshold; and requires controls exceeding AQR 50 by specifying control efficiency for vapor collection system	Exceeds presumptive RACT control level

Replacing AQR 50 with 40 CFR Part 60, Subparts K, Ka, and Kb and 40 CFR Part 63, Subpart BBBBBB satisfies the anti-backsliding provisions in Sections 110(l) and 193 of the Act because these federal regulations are at least equivalent in stringency. Adopting the federal regulations will improve rule effectiveness by consolidating regulatory compliance obligations under their detailed compliance demonstration requirements.

Replacement of AQR 51

SIP-approved AQR 51 regulates some bulk gasoline plants and all bulk gasoline terminals, and requires these facilities to use (1) submerged- or bottom-filling methods, (2) vapor collection and disposal methods, or (3) some equivalent that achieves a control efficiency of 90%, depending on the facility's annual throughput. Subections 13.3 and 14.2, which will replace AQR 51, incorporate 40 CFR Part 60, Subparts XX and XXa and 40 CFR Part 63, Subpart BBBBBB to meet CTG RACT requirements.

Table 2 shows the general control requirements of 40 CFR Part 60, Subparts XX and XXa and 40 CFR Part 63, Subpart BBBBBB for adoption into the SIP to meet RACT. It explains how the federal regulations meet the existing requirements of AQR 51 and are at least as stringent as EPA's presumptive RACT.

Table 2. Comparison of Federal Rules to AQR 51 and Presumptive RACT

Construct/ Reconstruct Date	Reg. Citation (40 CFR)	Affected Source	Req't	General Exemptions	AQRs 51, 60.1 Comp.	CTGs Comp.
12/17/80– 6/10/22	§ 60.502: Bulk Gasoline Terminal Loading Rack	All loading racks at bulk gasoline terminal (>75,700 L/day gasoline or 20,000 gal/day throughput) delivering liquid product into gasoline tank trucks	Exceeds 90% control efficiency in AQR 51.4, equip with vapor-tight vapor collection system designed to collect total organic compound vapors displaced from tank trucks during product loading with emissions ≤35 mg TOC/L gasoline loaded, or if		Exceeds 90% control efficiency in AQR 51.4 for new sources, and is roughly equivalent to control efficiency requirement for existing sources	Meets or exceeds 80 mg/L presumptive RACT

Construct/ Reconstruct Date	Reg. Citation (40 CFR)	Affected Source	Req't	General Exemptions	AQRs 51, 60.1 Comp.	CTGs Comp.
			equipped with existing system constructed before 12/17/80 <80 mg/L			
6/11/22 or after	§ 60.502a: Bulk Gasoline Terminal Loading Rack	Loading racks at a bulk gasoline terminal (>75,700 L/day gasoline or 20,000 gal/day throughput) that deliver liquid product into gasoline cargo tanks, including the gasoline loading racks, the vapor collection systems, and the vapor processing system	Use submerged fill and equip with vapor-tight vapor collection system to collect vapors from cargo tanks during loading New Units: use Thermal Oxidizer reduce emissions to <1.0 mg TOC/L; 3-hour rolling average temp, or vapor recovery system ≤550 ppm TOC on 3-hour rolling average		Meets emissions control system requirement in AQR 51.1, and exceeds control requirement for new sources	Meets required control for existing sources and exceeds required controls for new sources
	§ 63.11086: Bulk Gasoline Plant Loading Tanks and Trucks	Area source bulk gasoline terminal (≥20,000 gal/ day gasoline	If >250 gal, load tank or truck using submerged fill that meets specifications by date installed; all tanks, minimize gasoline spills and follow other work practices such as monthly leak inspection	Gas service stations	Meets AQR 51.1.1 requirement to use submerged fill; although rule has no exemption, exempt facilities are covered by AQR 102	Meets presumptive RACT control Option 1
None	§ 63.11088 & Table 2: Bulk Gasoline Terminal Loading Rack	throughput), pipeline breakout station, pipeline pumping station, and bulk gasoline plant	If total gasoline throughput ≥250,000 gal/day, equip with vapor collection system and reduce to 80 mg TOC/L		Meets 51.1 and 51.4.1 requirement for vapor collection and disposal.	Meets 80 mg/L presumptive RACT control requirement
	§ 63.11088 and Table 2: Bulk Gasoline Terminal Loading Rack	(<20,000 gal) as specified	If total gasoline throughput <250,000 gal/day, use submerge fill with pipe <6" from bottom		Meets AQR 51.1.1 requirement to use submerged fill	Does not meet presumptive RACT emissions limitation of 80 mg/L, but this level of emissions control would be

Construct/ Reconstruct Date	Reg. Citation (40 CFR)	Affected Source	Req't	General Exemptions	AQRs 51, 60.1 Comp.	CTGs Comp.
						required for sources under Subpart XX
	§ 63.11089: Bulk Gasoline Terminal and Plants		Monthly leak inspection		Meets AQR 60.1 best practice requirement	Meets or exceeds presumptive RACT leak detection program

Although there are some differences in the applicability elements of the NSPS/NESHAP and AQR 51, DAQ has determined these differences are not so meaningful as to decrease SIP stringency by incorporating by reference the federal regulations: for example, 40 CFR Part 60, Subpart XX regulates facilities with a throughput greater than 20,000 gal/day; AQR 51 includes an annual throughput limit that, when divided evenly throughout the year, would yield an applicability criterion with a lower daily throughput. DAQ used the annual throughput limit to provide greater flexibility in operations; a facility is more likely to exceed the 20,000-gal/day applicability of Subpart XX than the annual limit in AQR 51, making the applicability in Subpart XX more stringent than that in AQR 51.

While Subpart XXa does not include a specific throughput limit equivalent to the presumptive RACT emissions limitation (80 mg/L), facilities subject to Subpart XXa are likely also subject to 40 CFR Part 63, Subpart BBBBBB, which includes this specific limit. DAQ has determined that 40 CFR Part 60, Subparts XX and XXa and 40 CFR Part 63, Subpart BBBBBB collectively represent the most current assessment of emissions control capabilities to meet the best available system of emissions reduction under Section 111 of the Act and maximum achievable control technology under Section 112 of the Act. These regulatory standards exceed the statutory requirement for CTG RACT, and are as or more stringent than AQR 51. DAQ concludes that adopting these federal regulations into the SIP will satisfy CTG RACT requirements.

DAQ estimates no additional emissions reductions will result from these CTG RACT requirements, but there will be no loss in emissions reduction from rescinding AQR 51 from the SIP. The replacement of AQR 51 with 40 CFR Part 60, Subparts XX and XXa and 40 CFR Part 63, Subpart BBBBB satisfies the anti-backsliding provisions in Sections 110(l) and 193 of the Act because these federal regulations are at least equivalent in stringency. Adopting the federal regulations will improve rule effectiveness by consolidating regulatory compliance obligations under their detailed compliance demonstration requirements.

COMMENTS RECEIVED AND DAQ RESPONSES

DAQ published a notice in the *Las Vegas Review-Journal* and made copies of Sections 50 and 51 available for public notice, both online and at its offices, from October 14, 2024, to November 14, 2024. No comments were received. Staff has scheduled a public hearing before the Clark County Board of County Commissioners for December 3, 2024.

END

BCC 12/3/2024 #42 Approved item for signature

Final Audit Report 2024-12-05

Created: 2024-12-04 (Pacific Standard Time)

By: Asano Taylor (TaylorA@ClarkCountyNV.gov)

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"BCC 12/3/2024 #42 Approved item for signature" History

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LAS VEGAS REVIEW-JOURNAL LAS VEGAS SUN

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AFFIDAVIT OF PUBLICATION

STATE OF NEVADA) COUNTY OF CLARK) SS:

> CC CLERK ATTN: COMMISSION CLERK RM 6037 500 S GRAND CENTRAL PKWY LAS VEGAS NV 89155

Account # Order ID 104095 326812

Leslie McCormick, being 1st duty sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal/Las Vegas Sun, daily newspaper regularly issued, published and circulated in the Clark County, Las Vegas, Nevada and that the advertisement, a true copy attached for, was continuously published in said Las Vegas Review-Journal/Las Vegas Sun, in 2 edition(s) of said newspaper issued from 12/10/2024 to 12/17/2024, on the following day(s):

12/10/2024, 12/17/2024

Leslie McCormick

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this December 17, 2024

Notary

LINDA ESPINOZA Notary Public, State of Nevada My Appointment No. 24-9178-01 Expires: July 14, 2028

ORDINANCE NO. 5197

AN ORDINANCE TO REPEAL CLARK COUNTY AIR QUALITY REGULATIONS SECTION 50, "STORAGE OF PETROLEUM PRODUCTS," AND SECTION 51, "PETROLEUM PRODUCT LOADING INTO TANK TRUCKS AND TRAILERS"; AND PROVIDING FOR OTHER MATTERS PROPERLY RELATED THERETO.

RELATED THERETO.

NOTICE IS HEREBY GIVEN that typewritten copies of the above numbered and entitled Ordinance are available for inspection by all interested parties at the Office of the County Clerk of Clark County, Nevada, at her Commission Division Office on the first floor of the Clark County Government Center, 500 South Grand Central Parkway, Las Vegas, Nevada, and that said Ordinance was proposed by Commissioner Tick Segerblom on the 19th day of November 2024 and passed on the 3rd day of December 2024, by the following vote of the Board of County Commissioners:

Aye: Tick Segerblom William McCurdy II James B. Gibson Marilyn K. Kirkpatrick Ross Miller Michael Naft

Nay: None

Abstaining: None

Absent:Justin Jones

This Ordinance shall be in full force and effect from and after the 18th day of December 2024.

LYNN MARIE GOYA, COUNTY CLERK and Ex-Officio Clerk of the Board of County Commissioners

Dated this 3rd of December 2024.(SEAL)

PUB: Dec. 10, 17, 2024 LV Review-Journal