



togetherforbetter

Clark County Air Pollution Control Hearing Board
Clark County Building Department
Presentation Room
4701 West Russell Road
Las Vegas, NV 89118

August 6, 2025 – 1:30 PM

Agenda

Note:

- Items on the agenda may be taken out of order.
- The Air Pollution Control Hearing Board may combine two (2) or more agenda items for consideration.
- The Air Pollution Control Hearing Board may remove an item from the agenda or delay discussion relating to an item at any time.
- No action may be taken on any matter not listed on the posted agenda.
- Please turn off or mute all cell phones and other electronic devices.
- Please take all private conversations outside the room.
- With a forty-eight (48) hour advance request, a sign language interpreter or other reasonable efforts to assist and accommodate persons with physical disabilities, may be made available by calling (702) 455-0354, TDD at (702) 385-7486, or Relay Nevada toll-free at (800) 326-6868, TD/TDD
- Supporting material provided to the Board members for this meeting may be requested from Sherrie Rogge, Administrative Secretary, agenforcement@clarkcountynv.gov or (702) 455-0354.
- Supporting material is also available at the Clark County Department of Environment & Sustainability, 4701 West Russell Road, 2nd Floor, Las Vegas NV 89118.
- Supporting material is/will be available on the Department's website at:
https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/compliance/enforcement-notice

Hearing Board Members

Daniel Sanders, Chair
Ryan L. Dennett, Esq., Vice-Chair
Daniel Bartlett
Donald Bordelove
Troy Hildreth
Amy Lahav

Hearing Board Counsel

Nichole Kazimirovicz

Air Quality Staff

Marci Henson, Director
Shibi Paul, Deputy Director
Anna Sutowska, Air Quality Supervisor

Department Counsel

Timothy J. Allen

Administrative Secretary

Sherrie Rogge, Phone: 702-455-0354; Email agenforcement@clarkcountynv.gov
Business Address: Clark County Department of Environment & Sustainability,
4701 W. Russell Road, 2nd Floor, Las Vegas NV 89118

1. **CALL TO ORDER**

2. **PUBLIC COMMENT**

This is a period devoted to comments by the general public about items on this agenda. No discussion, action, or votes may be taken on this agenda item. You will be afforded the opportunity to speak on individual Public Hearing Items at the time they are presented. If you wish to speak to the Board about items within its jurisdiction but not appearing on this agenda, you must wait until the "Comments by the General Public" period listed at the end of this agenda. Comments will be limited to three (3) minutes. Please step up to the speaker's podium, if applicable, clearly state your name and address and please **spell** your last name for the record. If any member of the Board wishes to extend the length of a presentation, this will be done by the Chairperson or the Board by majority vote.

3. **APPROVAL OF MINUTES**

Approval of April 8, 2025 meeting minutes.
(For possible action)

4. **ACCEPT HEARING BOARD ORDERS**

Review competing hearing board orders from hearings conducted on April 8, 2025, in the matter of Notices of Violation: #9994 issued to ETON Transportation Corp.; and #10078 issued to ETON Transportation Corp., Environmental Transportation of Nevada, LLC dba ETON, and Moe Truman, and decide which proposed orders, or parts thereof, to accept.
(For possible action)

5. **REPORT BY DIVISION OF ENVIRONMENT & SUSTAINABILITY STAFF**

General update.

6. **IDENTIFY EMERGING ISSUES TO BE DISCUSSED BY THE BOARD AT A FUTURE MEETING**

7. **PUBLIC COMMENT**

A period devoted to comments by the general public about matters relevant to the Board's jurisdiction will be held. No vote may be taken on a matter not listed on the posted agenda. Comments will be limited to three (3) minutes. Please step up to the speaker's podium, if applicable, clearly state your name and address and please **spell** your last name for the record. If any member of the Board wishes to extend the length of a presentation, this will be done by the Chairperson or the Board by majority vote.

8. **ADJOURNMENT**

The Presentation Room is accessible to individuals with disabilities. Within forty-eight (48) hour advanced request, a sign language interpreter may be made available by contacting (702) 455-0354 or TDD (702) 385-7486 or Nevada Relay toll-free (800) 326-6868, TT/TDD. Assistive listening devices are available upon request.

This meeting has been properly noticed and posted online at: https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/compliance/hearings-notice and Nevada Public Notice at <https://notice.nv.gov/> and in the following location:

Clark County Operations Center, West, 4701 W. Russell Road, Las Vegas, Nevada (Principal Office)



Minutes

Regular Meeting of the Clark County Air Pollution Control Hearing Board

April 8, 2025

**Clark County Building Services
Presentation Room
4701 West Russell Road
Las Vegas, NV**

1. CALL TO ORDER

Chair Sanders called the meeting of the Air Pollution Control Hearing Board to order at the hour of 10:02 a.m. A quorum was present, and Affidavits of Posting of the agenda were provided as required by the Nevada Open Meeting Law. The Affidavits will be incorporated into the official record.

PRESENT: Daniel Sanders, Chair
Ryan L. Dennett, Vice-Chair*
Daniel Bartlett
Donald Bordelove
Amy Lahav

ABSENT: Troy Hildreth
*Ryan L. Dennett, Vice Chair – left the meeting at 10:07 a.m.

**HEARING BOARD
COUNSEL:** Nichole Kazimirovicz, Deputy District Attorney

DAQ STAFF: Marci Henson, Director
Anna Sutowska, Air Quality Supervisor
Sherrie Rogge, Administrative Secretary

**DEPARTMENT
COUNSEL:** Timothy J. Allen, Deputy District Attorney

2. PUBLIC COMMENT

Chair Sanders asked if there were any persons present in the audience wishing to be heard. There being no one, Chair Sanders closed the public comments.

3. APPROVAL OF MINUTES OF THE JANUARY 28, 2025, MEETING (For possible action)

Chair Sanders called for comments, changes, or corrections to the January 28, 2025 minutes. Being none, he called for a motion.

FINAL ACTION: It was moved by Board Member Dennett, seconded by Board Member Lahav, that the subject minutes be approved.

Motion carried by the following vote:

Voting Aye: Daniel Sanders, Ryan Dennett, Daniel Bartlett, Donald Bordelove, Amy Lahav
Voting Nay: None
Abstaining: None
Absent: Troy Hildreth

4. ACCEPT HEARING BOARD ORDERS

Review competing hearing board orders from the hearings conducted on January 28, 2025, in the matter of Notices of Violation: #9907 issued to Assured Development, Inc. and Joseph Yakubik; #9946, #9979, and #10008 issued to Atlas Holdings International LLC and Joseph Yakubik, and decide which proposed orders, or parts thereof, to accept.

Mr. Joseph Yakubik, representative for appellants, was not in attendance when this item was called, and had not submitted competing hearing board orders for the Board to review.

Vice-Chair Dennett stated that per Board's Counsel, Yakubik is in disagreement with the proposed orders submitted by Catherine Jorgenson, former Deputy District Attorney, and that Yakubik had indicated he would be submitting competing orders or appear at today's hearing.

FINAL ACTION: It was moved by Board Member Dennett, seconded by Board Member Lahav to approve the Hearing Board Orders from the January 28, 2025, meeting in the matter of Notices of Violation: #9907 issued to Assured Development, Inc., and Joseph Yakubik; #9946, #9979, and #10008 issued to Atlas Holdings International LLC and Joseph Yakubik.

Motion carried by the following vote:

Voting Aye: Daniel Sanders, Ryan Dennett, Daniel Bartlett, Donald Bordelove, Amy Lahav
Voting Nay: None
Abstaining: None
Absent: Troy Hildreth

5. APPEAL OF HEARING OFFICER DECISION

Vice-Chair Dennett recused himself from NOV #9994 and NOV #10078 due to a potential conflict of interest.

Mr. Dennett left the meeting at 10:07 a.m.

A. **ETON TRANSPORTATION CORP. (DCOP #57148)**

NOV #9994 – On November 5, 2024, the Hearing Officer found ETON Transportation Corp. in violation of Sections 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil stabilization standards 24 hours a day, seven days a week, as identified by Air Quality Specialist Canduella Rowsell, Senior Air Quality Specialists Katrinka Byers and Andrew Kirk, and Air Quality Supervisor David Dean during a routine inspection on January 8, 2024, and follow-up inspections on January 9 and 17, 2024 at the Stratford-1 construction project, located at 2596 Stratford Avenue, in Clark County, Nevada. The Hearing Officer assessed a penalty amount of \$3,500.00. Respondent appealed.

Conduct Hearing and Render Decision
(For possible action)

B. **ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC D/B/A ETON, AND MOE TRUMAN, INDIVIDUALLY (DCOP #57148)**

NOV #10078 – On November 5, 2024, the Hearing Officer found ETON Transportation Corp., Environmental Transportation of Nevada, LLC d/b/a ETON, and Moe Truman, individually, in violation of Sections 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil stabilization standards 24 hours a day, seven days a week, and Section 4.1(d)(1) for refusing entry or access to the Control Officer who requests entry for purposes of inspection, as identified by Air Quality Specialists Canduella Rowsell and Noel Crandall, and Senior Air Quality Specialist Andrew Kirk during a routine inspection on July 17, 2024, and follow-up inspections on July 25 and 31, 2024, and August 7 and 14, 2024, at the Stratford-1 construction project, located at 2596 Stratford Avenue, in Clark County Nevada. The Hearing Officer assessed a penalty amount of \$17,250.00. Respondents appealed.

Conduct Hearing and Render Decision
(For possible action)

Russell G. Gubler, State Bar No. 10889, 8831 West Sahara Avenue, Las Vegas NV 89117, Attorney for the Respondent, Mitchell “Moe” Truman, ETON Transportation Corp., Environmental Transportation of Nevada, LLC d/b/a ETON.

Timothy Allen, Deputy District Attorney, State Bar No. 14818, 500 South Grand Central Parkway, Las Vegas NV 89155, Attorney for Clark County Department of Environment and Sustainability, Division of Air Quality (Air Quality).

Mr. Allen stated that he and Mr. Gubler had discussed briefly before the hearing as to whether or not it would be amendable to the Board to submit the transcripts from the prior Hearing Officer meetings and not have to present all of the prior evidence de novo, and then have some new testimony presented that’s different from those transcriptions.

Based upon the Board's agreement to accept the transcriptions, Mr. Allen requested the transcripts of the October 29, 2024, and November 5, 2024, Hearing Officer Meetings – Exhibits 30 and 31 of Respondents' Pre-Hearing Brief dated March 28, 2025 (bates number 242 through 418) be admitted into the record.

Mr. Gubler requested that the Clark County employees in the room that previously testified be sequestered during the hearing.

Mr. Allen requested that Air Quality Supervisor Anna Sutowska be allowed to stay in the room for these hearings as she represents the Division of Air Quality at these meetings and provides testimony in regard to the final penalties of a Notice of Violation. There was no objection to this request.

Chair Sanders asked that David Dean, Katrinka Byers, Andrew Kirk, Canduella Rowsell, and Noel Crandall leave the room until called for testimony.

Mr. Gubler presented his client's case.

Mr. Gubler called Mr. Truman to testify.

Chair Sanders swore the following person in for questioning by Mr. Gubler and Mr. Allen:

Mitchell Wade Truman, ETON Transportation Corp., 2596 Stratford Ave., Las Vegas

Mr. Gubler and Mr. Allen questioned Mr. Truman.

Mr. Gubler requested the following documents be entered as exhibits: Exhibit 32-photos of the Formula 1 Tropicana Yard taken on 4/7/2025; Exhibit 33-Bills of Lading for Expedite Las Vegas Corp and Omaha Track from 3/18/2024, 2/27/2025, 3/14/2025, and 3/18/2025; and Exhibit 34-photos of the ETON property taken on 3/27/2025.

Mr. Allen presented Air Quality's case for NOV #9994 and called Ms. Sutowska to testify.

Chair Sanders swore the following person in for questioning:

Anna Sutowska, Air Quality Supervisor, Enforcement Section

Mr. Allen questioned Ms. Sutowska. Mr. Gubler didn't have any questions for the witness.

General discussion ensued amongst the Board.

FINAL ACTION: It was moved by Board Member Sanders, seconded by Board Member Lahav, to deny the appeal and affirm the Hearing Officer Order in the matter of NOV #9994 as it relates to the findings of violation.

Motion carried by the following vote:

Voting Aye: Daniel Sanders, Daniel Bartlett, Donald Bordelove, Amy Lahav

Voting Nay: None
Abstaining: None
Absent: Ryan Dennett, Troy Hildreth

FINAL ACTION: It was moved by Board Member Sanders, seconded by Board Member Lahav to affirm the Hearing Officer Order in the matter of NOV #9994 for the assessment of an administrative penalty in the amount of \$3,500.00.

Motion carried by the following vote:

Voting Aye: Daniel Sanders, Daniel Bartlett, Donald Bordelove, Amy Lahav
Voting Nay: None
Abstaining: None
Absent: Ryan Dennett, Troy Hildreth

Chair Sanders asked whether Mr. Gubler and Mr. Allen had additional arguments for NOV #10078.

Mr. Gubler made a statement that there is a Fourth Amendment issue on violation two and referred back to the arguments made in his brief.

Mr. Allen made an argument as to the presentment of credentials.

Neither party had questions for the witnesses.

FINAL ACTION: It was moved by Board Member Lahav, seconded by Board Member Bartlett, to deny the appeal and affirm the Hearing Officer Order in the matter of NOV #10078 as it relates to the findings of violation.

Motion carried by the following vote:

Voting Aye: Daniel Sanders, Daniel Bartlett, Donald Bordelove, Amy Lahav
Voting Nay: None
Abstaining: None
Absent: Ryan Dennett, Troy Hildreth

Discussion ensued amongst the Board in regard to the assessment of a penalty.

FINAL ACTION: It was moved by Board Member Lahav, seconded by Board Member Bartlett, to modify the Hearing Officer Order as to the penalty assessed from \$17,250.00 to \$31,562.50 in the matter of NOV #10078.

Motion carried by the following vote:

Voting Aye: Daniel Bartlett, Donald Bordelove, Amy Lahav
Voting Nay: Danny Sanders
Abstaining: None
Absent: Ryan Dennett, Troy Hildreth

6. IDENTIFY EMERGING ISSUES TO BE DISCUSSED BY THE BOARD AT FUTURE MEETINGS

There were no emerging issues identified by the Board.

7. PUBLIC COMMENT

Chair Sanders asked if there were any persons present in the audience wishing to be heard.

Mr. Truman asked the Board what can be done about his civil rights in regard to having inspectors on his property.

Mr. Allen stated he would meet with Mr. Truman and his Counsel about access to his site going forward so any issues can be resolved.

Director of Environment and Sustainability, Marci Henson, made a public comment that after reaching out to the Building Official about the badges their inspectors use, it was confirmed that Air Quality's badges are the same as the building inspectors. Ms. Henson also stated that she would be meeting with staff to review Air Quality's policies on accessing properties during inspections, and she would report back to the Board at a future meeting.

8. ADJOURNMENT

Being no further business, Chair Sanders adjourned the meeting at 12:09 p.m.

Approved:

Daniel Sanders, Chair

Date

ETON Transportation Corp., Environmental Transportation of Nevada LLC dba ETON, and Moe Truman, Individually (DCOP #57148)

Appeal of NOVs #9994 and #10078

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Hearing Board Order Denying Appeal NOV #9994 as Originally Prepared
by Clark County Department of Environmental and Sustainability,
Division of Air Quality, with Tracked Changes as Submitted by
Attorney Russell Gubler on Behalf of
ETON Transportation Corp.

1 **BEFORE THE AIR POLLUTION CONTROL HEARING BOARD**

2 **CLARK COUNTY, NEVADA**

3 In the Matter of Notice of Violation #9994
4 Issued to
4 ETON TRANSPORTATION CORP.

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#9994**

5 *Appellant.*

6
7 The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON
8 Transportation Corp. (**ETON**), was heard de novo by the Air Pollution Control Hearing Board
9 (**BOARD**) on April 8, 2025. Clark County Department of Environment and Sustainability, Division
10 of Air Quality (**AIR QUALITY**) represented by Timothy Allen, Deputy District Attorney, and ETON,
11 represented by Russell G. Gubler, appeared before the BOARD. Based on the November 5, 2024 Air
12 Pollution Control Hearing Officer meeting transcript, record, and the parties' written and oral
13 argument and upon motion duly made, seconded and carried by unanimous vote of the members
14 present, this BOARD finds and orders as follows:

15 A. Notice of Violation (**NOV**) #9994 was issued by AIR QUALITY to Appellant ETON
16 on May 15, 2024, for alleged violation(s) of the Clark County Air Quality Regulations (**AQRs**) at the
17 STRATFORD-1 construction site, located at 2596 Stratford Avenue, in Clark County, Nevada. In the
18 NOV, AIR QUALITY alleged violation of AQR Sections 94.13(a) and (b) for failing to employ Best
19 Available Control Measures and comply with soil stabilization standards at the site 24 hours a day,
20 seven days a week.

21 B. ETON contested the NOV and requested a hearing before a Hearing Officer. At the
22 hearing on November 5, 2024, the Hearing Officer found ETON in violation of AQR Sections 94.13(a)
23 and (b) on January 8, 9, and 17, 2024, as alleged in NOV #9994. The Hearing Officer assessed a Three
24 Thousand Five Hundred and no/100 Dollars (\$3,500.00) penalty.

25 C. In accordance with AQR Section 7.5, ETON submitted a timely appeal of the Hearing
26 Officer Order and requested a de novo hearing before the BOARD.

27 Although the issues were raised, the BOARD declined to consider the following arguments by ETON
28 in rendering a decision: that AIR QUALITY has failed to meet the conditions precedent under AQR

1 4.1 and NRS 445B.580; AIR QUALITY failed to follow property owner's request to check in; AIR
2 QUALITY does not have sufficient credentials; AIR QUALITY failed to properly present credentials;
3 AIR QUALITY trespassed; AIR QUALITY failed to properly perform the drop test; any material
4 gathered is fruit of the poisonous tree and not admissible; the AQR is preempted by Federal Law;
5 ETON's federal obligations under HM-232 are in conflict with the AQR; the AQR is not a state-wide
6 implemented program under the Clean Air Act, as required; that the Courts, and not the BOARD, have
7 authority to interpret statutes and statutory ambiguities; the EPA was not authorized to bypass the
8 State of Nevada when it approved the AQR; the AQR unreasonably burdens railroad activity and/or
9 interferes with other interstate commerce; the BOARD was not the proper jurisdiction to hear ETON's
10 arguments; water and pavement are not the best available control measures under this application; the
11 difference between state and county regulations are in conflict, i.e., best practical methods vs. best
12 available control methods; roto milling is within the AQR guidelines; ETON is entitled to an
13 exception/exemption from asphalt; AIR QUALITY discriminated against ETON; AIR QUALITY
14 performed illegal searches and seizures on the subject property; and AIR QUALITY violated ETON's
15 due process rights. The BOARD finds that on January 8, 9, and 17, 2024, at the subject construction
16 site, ETON failed to use Best Available Control Measures as demonstrated through documentation or
17 inspections by AIR QUALITY staff on those dates in violation of AQR Sections 94.13(a) and (b).//
18 ++

19 D. ~~The BOARD finds that on January 8, 9, and 17, 2024, at the subject construction site,~~
20 ~~ETON failed to use Best Available Control Measures as demonstrated through documentation or~~
21 ~~inspections by AIR QUALITY staff on those dates in violation of AQR Sections 94.13(a) and (b).~~

22 E. The BOARD finds that the administrative penalty of Three Thousand Five Hundred
23 and no/100 Dollars (\$3,500.00) assessed against ETON for its violation of the AQRs is reasonable
24 and appropriate.

25 F. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in
26 the matter of NOV #9994 including the assessment of an administrative penalty against ETON of
27 Three Thousand Five Hundred and no/100 Dollars (\$3,500.00).

28 **THEREFORE, IT IS HEREBY ORDERED** that:

- 1 A. ETON's appeal is denied.
- 2 B. The Hearing Officer Order dated November 7, 2024, is affirmed.
- 3 C. An administrative penalty of Three Thousand Five Hundred and no/100 Dollars
- 4 (\$3,500.00) is assessed against ETON for violation of AQR Sections 94.13(a) and (b).

5 **IT IS SO ORDERED.**

6 DATED this ____ day of May, 2025.

7 AIR POLLUTION CONTROL HEARING BOARD

8

9

DANIEL SANDERS, CHAIR

10

11 Reviewed as to form and contentSubmitted
by:

12 **STEVEN B. WOLFSON,**
13 **DISTRICT ATTORNEY**

14 Declined to Sign
/s/ Timothy Allen

15 By: TIMOTHY ALLEN
Deputy District Attorney
Nevada Bar No. 14818
16 500 South Grand Central Pkwy., Suite 5075
Las Vegas, Nevada 89155-2215
17 Attorneys for Clark County

Submitted By:

~~Reviewed as to form and content by:~~

JOHNSON & GUBLER, P.C.

/s/ Russell G. Gubler

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Las Vegas, NV 89117
Phone: (702) 471-0065
rgubler@mjohnsonlaw.com

Attorneys for Appellant ETON Transportation
Corp.

Hearing Board Order Denying Appeal NOV #10078 as Originally Prepared
by Clark County Department of Environmental and Sustainability, Division
of Air Quality, with Tracked Changes as Submitted by
Attorney Russell Gubler on Behalf of
ETON Transportation Corp., Environmental Transportation of Nevada LLC
dba ETON, and Moe Truman

1 **BEFORE THE AIR POLLUTION CONTROL HEARING BOARD**

2 **CLARK COUNTY, NEVADA**

3 In the Matter of Notice of Violation #10078
4 Issued to
5 ETON TRANSPORTATION CORP.,
6 ENVIRONMENTAL TRANSPORTATION
7 OF NEVADA, LLC D/B/A ETON, and MOE
8 TRUMAN

Appellants.

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#10078**

9 The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON
10 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
11 d/b/a ETON, and Moe Truman (**TRUMAN**), individually, (Collectively, "Appellants") was heard de
12 novo by the Air Pollution Control Hearing Board (**BOARD**) on April 8, 2025. Clark County
13 Department of Environment and Sustainability, Division of Air Quality (**AIR QUALITY**) represented
14 by Timothy Allen, Deputy District Attorney, and ETON TRANSPORTATION CORP.,
15 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN,
16 represented by Russell G. Gubler (**GUBLER**), appeared before the BOARD. Based on the November
17 5, 2024, Air Pollution Control Hearing Officer meeting transcript, record, and the parties' written and
18 oral argument and upon motion duly made, seconded and carried by unanimous vote of the members
19 present, this BOARD finds and orders as follows:

20 A. Notice of Violation (**NOV**) #10078 was issued by AIR QUALITY to Appellants ETON
21 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
22 d/b/a ETON, and TRUMAN on August 29, 2024, for alleged violation(s) of the Clark County Air
23 Quality Regulations (**AQRs**) at the STRATFORD-1 construction site, located at 2596 Stratford
24 Avenue, in Clark County, Nevada. In the NOV, AIR QUALITY alleged violation of AQR Sections
25 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil
26 stabilization standards at the site 24 hours a day, seven days a week, and AQR Section 4.1(d)(1) for
27 refusing entry or access to the Control Officer for purposes of inspection.

28 B. ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION
OF NEVADA, LLC d/b/a ETON, and TRUMAN contested the NOV and requested a hearing before

1 a Hearing Officer. At the hearing on November 5, 2024, the Hearing Officer found ETON
2 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
3 d/b/a ETON, and TRUMAN in violation of AQR Sections 94.13(a) and (b) on July 17, 2024, and
4 4.1(d)(1) on August 7, 2024, and August 14, 2024, as alleged in NOV #10078. The Hearing Officer
5 assessed a Seventeen Thousand Two Hundred Fifty and no/100 Dollars (\$17,250.00) penalty.

6 C. In accordance with AQR Section 7.5, ETON TRANSPORTATION CORP.,
7 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN
8 submitted a timely appeal of the Hearing Officer Order and requested a de novo hearing before the
9 BOARD.

10 D. Although the issues were raised, the BOARD declined to consider the following
11 arguments by Appellants in rendering a decision: that AIR QUALITY has failed to meet the
12 conditions precedent under AQR 4.1 and NRS 445B.580; AIR QUALITY failed to follow property
13 owner's request to check in; AIR QUALITY does not have sufficient credentials; AIR QUALITY
14 failed to properly present credentials; AIR QUALITY trespassed; AIR QUALITY failed to properly
15 perform the drop test; any material gathered is fruit of the poisonous tree and not admissible; the AQR
16 is preempted by Federal Law; Appellants' federal obligations under HM-232 are in conflict with the
17 AQR; the AQR is not a state-wide implemented program under the Clean Air Act, as required; that
18 the Courts, and not the BOARD, have authority to interpret statutes and statutory ambiguities; the
19 EPA was not authorized to bypass the State of Nevada when it approved the AQR; the AQR
20 unreasonably burdens railroad activity and/or interferes with other interstate commerce; the BOARD
21 was the proper jurisdiction to hear Appellant(s)' arguments; water and pavement are not the best
22 available control measures under this application; the difference between state and county regulations
23 are in conflict, i.e., best practical methods vs. best available control methods; roto milling is within
24 the AQR guidelines; Appellants are entitled to an exception/exemption from asphalt; AIR QUALITY
25 discriminated against Appellants; AIR QUALITY performed illegal searches and seizures on the
26 subject property; and AIR QUALITY violated Appellants' due process rights. The BOARD finds that

27 on July 17, 2024, at the subject construction site, ETON TRANSPORTATION CORP.,
28 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN failed

1 to employ Best Available Control Measures as demonstrated through documentation and inspections
2 by AIR QUALITY staff in violation of AQR Sections 94.13(a) and (b).

3 D.E. In addition, the BOARD finds that on July 31, 2024, August 7, 2024, and August 14,
4 2024, ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF
5 NEVADA, LLC d/b/a ETON, and TRUMAN refused entry or access to the Control Officer for
6 purposes of inspection in violation of AQR Section 4.1(d)(1).

7 E.F. The BOARD finds that an administrative penalty of Thirty-One Thousand Five
8 Hundred Sixty-Two and 50/100 Dollars (\$31,562.50) against ETON TRANSPORTATION CORP.,
9 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN for its
10 violation of the AQRs is reasonable and appropriate.

11 F.G. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in
12 the matter of NOV #10078 as it relates to the finding of violation and modifies the assessment of an
13 administrative penalty against —ETON TRANSPORTATION CORP., ENVIRONMENTAL
14 TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN from Seventeen Thousand
15 Two Hundred Fifty and no/100 Dollars (\$17,250.00) to Thirty-One Thousand Five Hundred Sixty-
16 Two and 50/100 Dollars (\$31,562.50).

17 ///

18 **THEREFORE, IT IS HEREBY ORDERED** that:

19 A. ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION
20 OF NEVADA, LLC d/b/a ETON, and TRUMAN's appeal is denied.

21 B. The Hearing Officer Order dated November 7, 2024, is affirmed as to the finding of
22 violation and modified as to the penalty assessed.

23 ///

24 ///

1
2
3 C. An administrative penalty of Thirty-One Thousand Five Hundred Sixty-Two and
4 50/100 Dollars (\$31,562.50) is assessed against ETON TRANSPORTATION CORP.,
5 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN for
6 violation of AQR Sections 94.13(a) and (b), and 4.1(d)(1).

7 **IT IS SO ORDERED.**

8 DATED this ____ day of May, 2025.

9 AIR POLLUTION CONTROL HEARING BOARD

10
11

DANIEL SANDERS, CHAIR

12
13 ~~Submitted by:~~ Reviewed as to form and
14 content by:

15 **STEVEN B. WOLFSON,**
DISTRICT ATTORNEY

16 ~~Declined to Sign~~
~~/s/ Timothy Allen~~

17 By: TIMOTHY ALLEN
18 Deputy District Attorney
19 Nevada Bar No. 14818
20 500 South Grand Central Pkwy., Suite 5075
21 Las Vegas, Nevada 89155-2215
22 *Attorneys for Clark County*

~~Reviewed as to form and content by:~~ Submitted
By:

JOHNSON & GUBLER, P.C.

16 /s/ Russell G. Gubler

17 Russell G. Gubler (Nevada Bar No. 10889)
18 Lakes Business Park
19 8831 West Sahara Avenue
20 Las Vegas, NV 89117
21 Phone: (702) 471-0065
22 rgubler@mjohnsonlaw.com

23 *Attorneys for Appellant ETON Transportation*
24 *Corp., Environmental Transportation of*
25 *Nevada, LLC d/b/a ETON, and Moe Truman*

Request from Attorney Russell Gubler Representing ETON Transportation Corp., Environmental Transportation of Nevada LLC dba ETON, and Moe Truman, to Submit Competing Hearing Board Orders for the August 6, 2025, Hearing Board Meeting

From: [Russell Gubler](#)
To: [AQ Enforcement](#)
Cc: moe@eton.me; [Timothy Allen](#)
Subject: Competing Order for April 8, 2025 Meeting, #9994 & #10078
Date: Wednesday, May 21, 2025 12:37:04 PM
Attachments: [9994 order.appellant version.docx](#)
[10078 order.appellant version.docx](#)

This correspondence is submitted through Air Quality, to be submitted to the Board:

Dear Board:

The purpose of this letter is to submit competing Orders related to NOV#9994 and NOV#10078. The primary purpose for the competing orders is found in Paragraph D of both orders. The versions submitted by the AG's office would state that the Board considered all of the arguments raised by Appellants but did not find the arguments persuasive. However, during the hearing, although the Board allowed my clients to present their arguments for the appeal record, the Chair stated that he did not believe that the Board was equipped to consider all the arguments that appellants raised and stated that the Board would only determine whether or not there was a violation. Thus, to include in the orders that the Board considered the arguments presented by my clients but did not find them persuasive is not true. We believe that the transcript that will be before the appellate court will also show this. Accordingly, Appellants request that the Board adopt the attached competing Orders, submitted by the Appellants, which better captures the hearing. Thank you for your time and consideration in this matter.

Russell G. Gubler
Johnson & Gubler, P.C.
Lakes Business Park
8831 W. Sahara Avenue
Las Vegas, Nevada 89117
(702) 471-0065
(702) 471-0075 facsimile
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Johnson & Gubler, PLLC
162 N 400 E, Ste. A-204
St. George, UT 84770
(435) 574-4909

* Licensed in Nevada, Utah, & Arizona

This communication may contain information that is privileged under the attorney-client privilege, or the work product doctrine, and should be read only by the person to whom it is addressed. If you have received this communication in error, please delete it immediately.
Johnson & Gubler, P.C.

Competing Hearing Board Order prepared by Attorney Russell Gubler on
Behalf of ETON Transportation Corp., Environmental Transportation of
Nevada LLC dba ETON, and Moe Truman:

NOV #9994, Issued to ETON Transportation Corp.

BEFORE THE AIR POLLUTION CONTROL HEARING BOARD
CLARK COUNTY, NEVADA

In the Matter of Notice of Violation #9994
Issued to
ETON TRANSPORTATION CORP.

Appellant.

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#9994**

The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON Transportation Corp. (**ETON**), was heard de novo by the Air Pollution Control Hearing Board (**BOARD**) on April 8, 2025. Clark County Department of Environment and Sustainability, Division of Air Quality (**AIR QUALITY**) represented by Timothy Allen, Deputy District Attorney, and ETON, represented by Russell G. Gubler, appeared before the BOARD. Based on the November 5, 2024 Air Pollution Control Hearing Officer meeting transcript, record, and the parties' written and oral argument and upon motion duly made, seconded and carried by unanimous vote of the members present, this BOARD finds and orders as follows:

A. Notice of Violation (**NOV**) #9994 was issued by AIR QUALITY to Appellant ETON on May 15, 2024, for alleged violation(s) of the Clark County Air Quality Regulations (**AQRs**) at the STRATFORD-1 construction site, located at 2596 Stratford Avenue, in Clark County, Nevada. In the NOV, AIR QUALITY alleged violation of AQR Sections 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil stabilization standards at the site 24 hours a day, seven days a week.

B. ETON contested the NOV and requested a hearing before a Hearing Officer. At the hearing on November 5, 2024, the Hearing Officer found ETON in violation of AQR Sections 94.13(a) and (b) on January 8, 9, and 17, 2024, as alleged in NOV #9994. The Hearing Officer assessed a Three Thousand Five Hundred and no/100 Dollars (\$3,500.00) penalty.

C. In accordance with AQR Section 7.5, ETON submitted a timely appeal of the Hearing Officer Order and requested a de novo hearing before the BOARD.

D. Although the issues were raised, the BOARD declined to consider the following arguments by ETON in rendering a decision: that AIR QUALITY has failed to meet the conditions

precedent under AQR 4.1 and NRS 445B.580; AIR QUALITY failed to follow property owner's request to check in; AIR QUALITY does not have sufficient credentials; AIR QUALITY failed to properly present credentials; AIR QUALITY trespassed; AIR QUALITY failed to properly perform the drop test; any material gathered is fruit of the poisonous tree and not admissible; the AQR is preempted by Federal Law; ETON's federal obligations under HM-232 are in conflict with the AQR; the AQR is not a state-wide implemented program under the Clean Air Act, as required; that the Courts, and not the BOARD, have authority to interpret statutes and statutory ambiguities; the EPA was not authorized to bypass the State of Nevada when it approved the AQR; the AQR unreasonably burdens railroad activity and/or interferes with other interstate commerce; the BOARD was not the proper jurisdiction to hear ETON's arguments; water and pavement are not the best available control measures under this application; the difference between state and county regulations are in conflict, i.e., best practical methods vs. best available control methods; roto milling is within the AQR guidelines; ETON is entitled to an exception/exemption from asphalt; AIR QUALITY discriminated against ETON; AIR QUALITY performed illegal searches and seizures on the subject property; and AIR QUALITY violated ETON's due process rights. The BOARD finds that on January 8, 9, and 17, 2024, at the subject construction site, ETON failed to use Best Available Control Measures as demonstrated through documentation or inspections by AIR QUALITY staff on those dates in violation of AQR Sections 94.13(a) and (b).

E. The BOARD finds that the administrative penalty of Three Thousand Five Hundred and no/100 Dollars (\$3,500.00) assessed against ETON for its violation of the AQRs is reasonable and appropriate.

F. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in the matter of NOV #9994 including the assessment of an administrative penalty against ETON of Three Thousand Five Hundred and no/100 Dollars (\$3,500.00).

THEREFORE, IT IS HEREBY ORDERED that:

A. ETON's appeal is denied.

B. The Hearing Officer Order dated November 7, 2024, is affirmed.

C. An administrative penalty of Three Thousand Five Hundred and no/100 Dollars

1 (\$3,500.00) is assessed against ETON for violation of AQR Sections 94.13(a) and (b).

2 **IT IS SO ORDERED.**

3 DATED this ____ day of May, 2025.

4 AIR POLLUTION CONTROL HEARING BOARD

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DANIEL SANDERS, CHAIR

7

8 Reviewed as to form and content by:

Submitted By:

9 **STEVEN B. WOLFSON,**
10 **DISTRICT ATTORNEY**

JOHNSON & GUBLER, P.C.

Declined to Sign

/s/ Russell G. Gubler

11

By: TIMOTHY ALLEN
Deputy District Attorney
Nevada Bar No. 14818
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Attorneys for Appellant ETON Transportation Corp.

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Competing Hearing Board Order prepared by Attorney Russell Gubler on
Behalf of ETON Transportation Corp., Environmental Transportation of
Nevada LLC dba ETON, and Moe Truman:

NOV #10078, Issued to ETON Transportation Corp., Environmental
Transportation of Nevada LLC dba ETON, and Moe Truman, Individually

BEFORE THE AIR POLLUTION CONTROL HEARING BOARD
CLARK COUNTY, NEVADA

In the Matter of Notice of Violation #10078
Issued to
ETON TRANSPORTATION CORP.,
ENVIRONMENTAL TRANSPORTATION
OF NEVADA, LLC D/B/A ETON, and MOE
TRUMAN

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#10078**

Appellants.

The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and Moe Truman (**TRUMAN**), individually, (Collectively, "Appellants") was heard de novo by the Air Pollution Control Hearing Board (**BOARD**) on April 8, 2025. Clark County Department of Environment and Sustainability, Division of Air Quality (**AIR QUALITY**) represented by Timothy Allen, Deputy District Attorney, and ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN, represented by Russell G. Gubler (**GUBLER**), appeared before the BOARD. Based on the November 5, 2024, Air Pollution Control Hearing Officer meeting transcript, record, and the parties' written and oral argument and upon motion duly made, seconded and carried by unanimous vote of the members present, this BOARD finds and orders as follows:

A. Notice of Violation (**NOV**) #10078 was issued by AIR QUALITY to Appellants ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN on August 29, 2024, for alleged violation(s) of the Clark County Air Quality Regulations (**AQRs**) at the STRATFORD-1 construction site, located at 2596 Stratford Avenue, in Clark County, Nevada. In the NOV, AIR QUALITY alleged violation of AQR Sections 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil stabilization standards at the site 24 hours a day, seven days a week, and AQR Section 4.1(d)(1) for refusing entry or access to the Control Officer for purposes of inspection.

B. ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN contested the NOV and requested a hearing before

1 a Hearing Officer. At the hearing on November 5, 2024, the Hearing Officer found ETON
2 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
3 d/b/a ETON, and TRUMAN in violation of AQR Sections 94.13(a) and (b) on July 17, 2024, and
4 4.1(d)(1) on August 7, 2024, and August 14, 2024, as alleged in NOV #10078. The Hearing Officer
5 assessed a Seventeen Thousand Two Hundred Fifty and no/100 Dollars (\$17,250.00) penalty.

6 C. In accordance with AQR Section 7.5, ETON TRANSPORTATION CORP.,
7 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN
8 submitted a timely appeal of the Hearing Officer Order and requested a de novo hearing before the
9 BOARD.

10 D. Although the issues were raised, the BOARD declined to consider the following
11 arguments by Appellants in rendering a decision: that AIR QUALITY has failed to meet the
12 conditions precedent under AQR 4.1 and NRS 445B.580; AIR QUALITY failed to follow property
13 owner's request to check in; AIR QUALITY does not have sufficient credentials; AIR QUALITY
14 failed to properly present credentials; AIR QUALITY trespassed; AIR QUALITY failed to properly
15 perform the drop test; any material gathered is fruit of the poisonous tree and not admissible; the AQR
16 is preempted by Federal Law; Appellants' federal obligations under HM-232 are in conflict with the
17 AQR; the AQR is not a state-wide implemented program under the Clean Air Act, as required; that
18 the Courts, and not the BOARD, have authority to interpret statutes and statutory ambiguities; the
19 EPA was not authorized to bypass the State of Nevada when it approved the AQR; the AQR
20 unreasonably burdens railroad activity and/or interferes with other interstate commerce; the BOARD
21 was the proper jurisdiction to hear Appellant(s)' arguments; water and pavement are not the best
22 available control measures under this application; the difference between state and county regulations
23 are in conflict, i.e., best practical methods vs. best available control methods; roto milling is within
24 the AQR guidelines; Appellants are entitled to an exception/exemption from asphalt; AIR QUALITY
25 discriminated against Appellants; AIR QUALITY performed illegal searches and seizures on the
26 subject property; and AIR QUALITY violated Appellants' due process rights. The BOARD finds that
27 on July 17, 2024, at the subject construction site, ETON TRANSPORTATION CORP.,
28 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN failed

1 to employ Best Available Control Measures as demonstrated through documentation and inspections
2 by AIR QUALITY staff in violation of AQR Sections 94.13(a) and (b).

3 E. In addition, the BOARD finds that on July 31, 2024, August 7, 2024, and August 14,
4 2024, ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF
5 NEVADA, LLC d/b/a ETON, and TRUMAN refused entry or access to the Control Officer for
6 purposes of inspection in violation of AQR Section 4.1(d)(1).

7 F. The BOARD finds that an administrative penalty of Thirty-One Thousand Five
8 Hundred Sixty-Two and 50/100 Dollars (\$31,562.50) against ETON TRANSPORTATION CORP.,
9 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN for its
10 violation of the AQRs is reasonable and appropriate.

11 G. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in
12 the matter of NOV #10078 as it relates to the finding of violation and modifies the assessment of an
13 administrative penalty against ETON TRANSPORTATION CORP., ENVIRONMENTAL
14 TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN from Seventeen Thousand
15 Two Hundred Fifty and no/100 Dollars (\$17,250.00) to Thirty-One Thousand Five Hundred Sixty-
16 Two and 50/100 Dollars (\$31,562.50).

17 **THEREFORE, IT IS HEREBY ORDERED** that:

18 A. ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION
19 OF NEVADA, LLC d/b/a ETON, and TRUMAN's appeal is denied.

20 B. The Hearing Officer Order dated November 7, 2024, is affirmed as to the finding of
21 violation and modified as to the penalty assessed.

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2 C. An administrative penalty of Thirty-One Thousand Five Hundred Sixty-Two and
3 50/100 Dollars (\$31,562.50) is assessed against ETON TRANSPORTATION CORP.,
4 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN for
5 violation of AQR Sections 94.13(a) and (b), and 4.1(d)(1).

6 **IT IS SO ORDERED.**

7 DATED this ____ day of May, 2025.

8 AIR POLLUTION CONTROL HEARING BOARD

9
10 _____
DANIEL SANDERS, CHAIR

11
12 Reviewed as to form and content by:

Submitted By:

13 **STEVEN B. WOLFSON,**
14 **DISTRICT ATTORNEY**

JOHNSON & GUBLER, P.C.

15 *Declined to Sign*

/s/ Russell G. Gubler

16 By: TIMOTHY ALLEN
17 Deputy District Attorney
18 Nevada Bar No. 14818
500 South Grand Central Pkwy., Suite 5075
Las Vegas, Nevada 89155-2215
Attorneys for Clark County

Russell G. Gubler (Nevada Bar No. 10889)
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Phone: (702) 471-0065
rgubler@mjohnsonlaw.com

*Attorneys for Appellant ETON Transportation
Corp., Environmental Transportation of
Nevada, LLC d/b/a ETON, and Moe Truman*

Hearing Board Order prepared by Clark County Department of
Environmental and Sustainability, Division of Air Quality,

NOV #9994, Issued to ETON Transportation Corp.

1 **BEFORE THE AIR POLLUTION CONTROL HEARING BOARD**

2 **CLARK COUNTY, NEVADA**

3 In the Matter of Notice of Violation #9994
4 Issued to
5 ETON TRANSPORTATION CORP.

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#9994**

6 *Appellant.*

7 The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON
8 Transportation Corp. (**ETON**), was heard de novo by the Air Pollution Control Hearing Board
9 (**BOARD**) on April 8, 2025. Clark County Department of Environment and Sustainability, Division
10 of Air Quality (**AIR QUALITY**) represented by Timothy Allen, Deputy District Attorney, and ETON,
11 represented by Russell G. Gubler, appeared before the BOARD. Based on the November 5, 2024 Air
12 Pollution Control Hearing Officer meeting transcript, record, and the parties' written and oral
13 argument and upon motion duly made, seconded and carried by unanimous vote of the members
14 present, this BOARD finds and orders as follows:

15 A. Notice of Violation (**NOV**) #9994 was issued by AIR QUALITY to Appellant ETON
16 on May 15, 2024, for alleged violation(s) of the Clark County Air Quality Regulations (**AQRs**) at the
17 STRATFORD-1 construction site, located at 2596 Stratford Avenue, in Clark County, Nevada. In the
18 NOV, AIR QUALITY alleged violation of AQR Sections 94.13(a) and (b) for failing to employ Best
19 Available Control Measures and comply with soil stabilization standards at the site 24 hours a day,
20 seven days a week.

21 B. ETON contested the NOV and requested a hearing before a Hearing Officer. At the
22 hearing on November 5, 2024, the Hearing Officer found ETON in violation of AQR Sections 94.13(a)
23 and (b) on January 8, 9, and 17, 2024, as alleged in NOV #9994. The Hearing Officer assessed a Three
24 Thousand Five Hundred and no/100 Dollars (\$3,500.00) penalty.

25 C. In accordance with AQR Section 7.5, ETON submitted a timely appeal of the Hearing
26 Officer Order and requested a de novo hearing before the BOARD.

27 ///

28 ///

1 D. The BOARD finds that on January 8, 9, and 17, 2024, at the subject construction site,
2 ETON failed to use Best Available Control Measures as demonstrated through documentation or
3 inspections by AIR QUALITY staff on those dates in violation of AQR Sections 94.13(a) and (b).

4 E. The BOARD finds that the administrative penalty of Three Thousand Five Hundred
5 and no/100 Dollars (\$3,500.00) assessed against ETON for its violation of the AQRs is reasonable
6 and appropriate.

7 F. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in
8 the matter of NOV #9994 including the assessment of an administrative penalty against ETON of
9 Three Thousand Five Hundred and no/100 Dollars (\$3,500.00).

10 **THEREFORE, IT IS HEREBY ORDERED** that:

11 A. ETON's appeal is denied.

12 B. The Hearing Officer Order dated November 7, 2024, is affirmed.

13 C. An administrative penalty of Three Thousand Five Hundred and no/100 Dollars
14 (\$3,500.00) is assessed against ETON for violation of AQR Sections 94.13(a) and (b).

15 **IT IS SO ORDERED.**

16 DATED this ____ day of May, 2025.

17 AIR POLLUTION CONTROL HEARING BOARD

18
19 _____
DANIEL SANDERS, CHAIR

20
21 Submitted by:

22 **STEVEN B. WOLFSON,**
23 **DISTRICT ATTORNEY**

24 */s/ Timothy Allen*

25 By: TIMOTHY ALLEN
26 Deputy District Attorney
Nevada Bar No. 14818
500 South Grand Central Pkwy, Suite 5075
Las Vegas, Nevada 89155-2215
Attorneys for Clark County

Reviewed as to form and content by:

27 **JOHNSON & GUBLER, P.C.**

28 */s/*

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Phone: (702) 471-0065
rgubler@mjohnsonlaw.com

Attorneys for Appellant ETON Transportation Corp.

Hearing Board Order prepared by Clark County Department of
Environmental and Sustainability, Division of Air Quality,

NOV #10078, Issued to ETON Transportation Corp., Environmental
Transportation of Nevada LLC dba ETON, and Moe Truman

1 **BEFORE THE AIR POLLUTION CONTROL HEARING BOARD**

2 **CLARK COUNTY, NEVADA**

3 In the Matter of Notice of Violation #10078
4 Issued to
5 ETON TRANSPORTATION CORP.,
6 ENVIRONMENTAL TRANSPORTATION
7 OF NEVADA, LLC D/B/A ETON, and MOE
8 TRUMAN

Appellants.

**ORDER DENYING APPEAL OF HEARING
OFFICER'S NOVEMBER 7, 2024, ORDER
CONCERNING NOTICE OF VIOLATION
#10078**

9 The appeal of the Hearing Officer Order dated November 7, 2024, submitted by ETON
10 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
11 d/b/a ETON, and Moe Truman (**TRUMAN**), individually, was heard de novo by the Air Pollution
12 Control Hearing Board (**BOARD**) on April 8, 2025. Clark County Department of Environment and
13 Sustainability, Division of Air Quality (**AIR QUALITY**) represented by Timothy Allen, Deputy
14 District Attorney, and ETON TRANSPORTATION CORP., ENVIRONMENTAL
15 TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN, represented by Russell G.
16 Gubler (**GUBLER**), appeared before the BOARD. Based on the November 5, 2024, Air Pollution
17 Control Hearing Officer meeting transcript, record, and the parties' written and oral argument and
18 upon motion duly made, seconded and carried by unanimous vote of the members present, this
19 BOARD finds and orders as follows:

20 A. Notice of Violation (**NOV**) #10078 was issued by AIR QUALITY to Appellants ETON
21 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
22 d/b/a ETON, and TRUMAN on August 29, 2024, for alleged violation(s) of the Clark County Air
23 Quality Regulations (**AQRs**) at the STRATFORD-1 construction site, located at 2596 Stratford
24 Avenue, in Clark County, Nevada. In the NOV, AIR QUALITY alleged violation of AQR Sections
25 94.13(a) and (b) for failing to employ Best Available Control Measures and comply with soil
26 stabilization standards at the site 24 hours a day, seven days a week, and AQR Section 4.1(d)(1) for
27 refusing entry or access to the Control Officer for purposes of inspection.

28 B. ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION
OF NEVADA, LLC d/b/a ETON, and TRUMAN contested the NOV and requested a hearing before

1 a Hearing Officer. At the hearing on November 5, 2024, the Hearing Officer found ETON
2 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
3 d/b/a ETON, and TRUMAN in violation of AQR Sections 94.13(a) and (b) on July 17, 2024, and
4 4.1(d)(1) on August 7, 2024, and August 14, 2024, as alleged in NOV #10078. The Hearing Officer
5 assessed a Seventeen Thousand Two Hundred Fifty and no/100 Dollars (\$17,250.00) penalty.

6 C. In accordance with AQR Section 7.5, ETON TRANSPORTATION CORP.,
7 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN
8 submitted a timely appeal of the Hearing Officer Order and requested a de novo hearing before the
9 BOARD.

10 D. The BOARD finds that on July 17, 2024, at the subject construction site, ETON
11 TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC
12 d/b/a ETON, and TRUMAN failed to employ Best Available Control Measures as demonstrated
13 through documentation and inspections by AIR QUALITY staff in violation of AQR Sections 94.13(a)
14 and (b). In addition, the BOARD finds that on July 31, 2024, August 7, 2024, and August 14, 2024,
15 ETON TRANSPORTATION CORP., ENVIRONMENTAL TRANSPORTATION OF NEVADA,
16 LLC d/b/a ETON, and TRUMAN refused entry or access to the Control Officer for purposes of
17 inspection in violation of AQR Section 4.1(d)(1).

18 E. The BOARD finds that an administrative penalty of Thirty-One Thousand Five
19 Hundred Sixty-Two and 50/100 Dollars (\$31,562.50) against ETON TRANSPORTATION CORP.,
20 ENVIRONMENTAL TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN for its
21 violation of the AQRs is reasonable and appropriate.

22 F. In accordance with the foregoing, the BOARD affirms the Hearing Officer Order in
23 the matter of NOV #10078 as it relates to the finding of violation and modifies the assessment of an
24 administrative penalty against ETON TRANSPORTATION CORP., ENVIRONMENTAL
25 TRANSPORTATION OF NEVADA, LLC d/b/a ETON, and TRUMAN from Seventeen Thousand
26 Two Hundred Fifty and no/100 Dollars (\$17,250.00) to Thirty-One Thousand Five Hundred Sixty-
27 Two and 50/100 Dollars (\$31,562.50).

28 ///



togetherforbetter

Environment & Sustainability

REPORT BY DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY STAFF (July 1, 2024 – June 30, 2025)

➤ Planning

▪ Criteria Pollutants

- Carbon Monoxide (CO) - attainment/maintenance
- Ozone (O₃)
 - **1997 O₃ NAAQS- attainment/maintenance:**
 - 2nd 10-year maintenance plan was approved by EPA in April 2024.
 - **2015 O₃ NAAQS:**
 - The U.S. Environmental Protection Agency (EPA) issued a finding of failure to attain and reclassification (89 FR 103657) for the Las Vegas Valley, hydrographic area (HA) 212, on December 19, 2024, effective January 21, 2025.
 - Effective January 21, 2025, the Las Vegas Valley (HA212) was reclassified from Moderate to a Serious nonattainment area.
 - As of January 21, 2025, the regulatory requirements for contingency measure, Section 102, “Gasoline Dispensing Facilities,” were initiated.
 - Ramboll’s consulting services were procured in October 2024 for modelling-related task for the 2015 Ozone Standard Serious Attainment Plan development.
 - On April 3, 2025, owners and operators of major sources of NO_x and/or VOCs were notified of their obligation to comply with Section 120, “Reasonably Available Control Technology Demonstration and Determination Requirements for Major Stationary Sources in Ozone Nonattainment Areas,” by August 1, 2025.
 - April 15, 2025, DAQ procured consultants, STI, to assist with developing the 2015 Ozone Standard Serious Attainment Plan.
 - Emulsified Asphalt rule development in progress. Stakeholder webinar will be held July 22, 2025, for feedback on the draft rule.
 - You can follow plan development (workshops, rules, notices, etc) here: [Ozone Serious Attainment Plan](#)
- **PM₁₀- attainment/maintenance**
 - Developed 2nd 10-year PM₁₀ maintenance plan to show how DES will maintain the NAAQS through 2034. Public hearing will be held on August 5, after which, the plan will be submitted.



Environment & Sustainability

- **PM_{2.5}- attainment**
 - The PM_{2.5} annual NAAQS was revised in February 2024, and DES is currently in attainment. Recommendations were submitted to NDEP/EPA withing the regulatory deadline.
- **Nitrogen dioxide (NO₂) – attainment**
- **Sulfur dioxide (SO₂) – attainment**
 - **Attainment** of the primary NAAQS.
 - 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 (SO₂), effective January 27, 2025 (89 FR 105692). SO₂ area designation letter being drafted for approval from the BCC in August. (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.
- **Lead (Pb) – attainment**
- **Studies**
 - Conducted in-house PM_{2.5} fingerprinting study and identified significant sources of PM_{2.5} in the Las Vegas Valley.
 - The VOC smoke tracer study is being continued. This study supports anticipated EE demonstrations and O₃ modeling. 2023 and 2024 results are available, and 2025 data are being analyzed.
 - A residential wood combustion and construction equipment NO_x emissions study has been initiated.
- **Modelling**
 - Increment Modelling: Approx. 13 major, 92 minor source reviews.
- **Smog Free Clark County**

Started in 2023, the Smog Free Clark County (SFCC) program is designed to improve air quality by reducing motor vehicle emissions. Owners of eligible vehicles from model years 1968 to 2006 may qualify for up to \$975 in emissions-related repairs. Table 1 summarizes the vehicle repairs and social media engagement details of this program

Table 1: Smog Free Clark County Program Statistics

Category	This Month (June 2025)	Last Month (May 2025)	Last Year (June 2024)	Project Total (FY 2025)	Program Total (2023-2025)
Applications Received	54	81	8	991	1,334
Vouchers Issued	20	131	6	766	946
Vouchers Redeemed	73	45	14	595	759
Calls Received	294	325	119	4,171	5,881



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Social Media Reach¹	24,420	66,671	65,414	1,662,814	3,611,187
Social Media Impressions²	33,923	109,349	62,742	2,626,871	5,465,044
Post Engagement³	1,186	2,674	2,882	78,258	132,695
Facebook Followers	1,036	1,027	550	1,036	1,036

¹ Reach indicates the unique number of individuals who have seen our content.

² Impressions indicate the total number of times our content is displayed regardless of click(s).

³ Engagement indicates the tracking of actions such as clicks, likes, comments, and shares.

➤ Monitoring

- Implemented 2025 Annual Monitoring Network Plan
 - Stations located in neighborhoods to assess exposure levels to the general population (18 AQ stations).
 - Network characterized pollution transported into Clark County and background levels natural to Clark County.
 - Deployed Photochemical Assessment Monitoring Station (PAMS) to monitor ozone precursors (NO₂ and VOCs), carbonyls, mixing layer, and solar/UV radiation.
 - Conducted additional ozone monitoring at Apex, Spring Mountain Youth Camp (SMYC) and Indian Springs during ozone season (April 1st – September 30th).
 - Deployed trace CO monitor SMYC during ozone season (April 1st – September 30th).
 - Commenced third year of County-wide monitoring study of wildfire tracers including acetonitrile, VOCs, carbonyls, and L-glucosan (April 1st – September 30th).
 - Completed final report from in-house PM_{2.5} fingerprinting study to identify significant sources contributing to PM_{2.5} in the Las Vegas Valley.
- Completed 2026 ozone monitoring waiver (waiting for EPA approval)
 - EPA granted ozone monitoring exemption for Indian Springs and Apex in 2025 (off ozone season).
- Completed and submitted to EPA 2025 5-year Network Assessment. The primary objectives of the Network Assessment are to determine if the network meets the monitoring objectives defined in 40 CFR part 58.10, appendix D, whether new sites are needed or existing sites are no longer needed and can be terminated.
- Received EPA grant to replace four aging AQ monitoring stations under Inflation Reduction Act (IRA). The project is managed by the Real Property Management (RPM) and commenced in July 2025.



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- Received EPA grant to purchase Carbonaceous Aerosols Speciation System (CASS) instrument to characterize composition of PM_{2.5} in the Las Vegas Valley. Instrument operates at Casino Center site and reports to AQS since January 2025.
- Hired two new AQ Monitoring Technicians (May and July 2025) to replace existing vacancies.

➤ Stationary Source Permitting

- Between July 2024 and June 2025, a total of 1,116 stationary source permit applications were received, and 1,027 permits were issued. Of the permits issued, 99.30% were completed within the required regulatory timelines—exceeding the department's goal of 90%.
- As of June 30, 2025, there were 1,190 active stationary source operating permits, including 34 Title V operating permits.
- Program Highlights (July 2024- June 2025)
 - Hired two new Air Quality Specialists and one Office Specialist during the fiscal year. With these additions, all available Air Quality Specialist (AQS) positions have been filled. However, two Senior AQS positions remain vacant, and recruitment is scheduled to begin in September 2025.
 - The Control Techniques Guideline (CTG) Registration Program, launched on April 2, 2024, continues to progress successfully. A total of 34 sources are now registered across all CTG categories, the majority of which are Gasoline Dispensing Facilities (GDFs) with annual throughput under 120,000 gallons.
 - The renewal process for the GDF general permit has been completed. Seven distinct GDF general permit categories have been created to separately address permitting requirements in attainment and nonattainment areas. To date, 571 GDF general permits and authority to operate (ATO) have been issued.
 - The renewal process for the Soil and Groundwater Remediation (SGR) general permit is underway. The current general permit and Authority to Operate (ATO) will expire on January 3, 2026.
 - Permitting Section has launched an initiative to bring back GDFs in Hydrographic Area 212 that currently operate under a certificate of exemption. These sources were previously exempt due to thresholds in effect at the time. However, AQR 102, which went into effect on April 2, 2024, introduced new permitting thresholds and a registration program for sources operating below the new threshold. Approximately one-third of these previously exempt sources have responded to outreach efforts and submitted registration or permit applications.



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- Stationary source permits are being updated to address fugitive emissions units that are subject to RACT/BACT/LAER with respect to the December 17, 2024, revision of AQR 92 and 94. As per the revised Section 94, the rule applies to all stationary sources located in Clark County as part of the consideration of a RACT, BACT, or LAER determination pursuant to Sections 12.1-12.4 of the Clark County Air Quality Regulations (AQRs). In accordance with this determination, provisions of Section 94 shall be incorporated into the stationary source permit.
- Permitting Section started implementing the enhanced vapor recovery requirements in GDF permits. As of January 21, 2025, the regulatory requirements of Section 102, “Gasoline Dispensing Facilities,” of the Clark County AQR regarding the use of California Air Resources Board (CARB)-Certified Enhanced Vapor Recovery (EVR) systems became effective. As a contingency measure to comply with the 2015 National Ambient Air Quality Standard for ozone, and as mandated by Section 172(c)(9) of the Clean Air Act (42 U.S.C. 7502), this regulation is part of the effort to reduce ozone levels in areas designated by EPA as nonattainment. By July 20, 2025, GDFs shall commence compliance with the EVR requirements of Section 102.7(c)(5) upon modifying, replacing, or newly installing any affected facility. All affected facilities shall be CARB-certified EVR systems two years after this notice (January 21, 2027).

➤ **Compliance: Dust Permits and Vacant Land**

- Issued 2,973 dust permits from July 1, 2024, through June 30, 2025; averaged 3.72 days to issue a dust permit.
- Conducted 8,308 construction inspections from July 1, 2024, through June 30, 2025.
- As of June 30, 2025, there were 1,682 active permits with a total of 23,668.56 acres of permitted area.

➤ **Compliance: Stationary Sources, Complaints and Enforcement**

- Conducted 995 stationary source inspections from July 1, 2024, through June 30, 2025.
- Received and responded to 1,126 complaints from July 1, 2024, through June 30, 2025; responded to 1,126 (100%) complaints within 24-hrs.



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- 121 Notices of Violation (NOVs) issued from July 1, 2024, through June 30, 2025:
 - 64 for construction/vacant land
 - 51 for stationary sources
 - 6 for asbestos
- Recommended \$666,100.44 in penalties from July 1, 2024, through June 30, 2025. Hearing Officer levied \$578,020.44.
 - \$72,715.00 has not yet been adjudicated.
 - Out of the 121 NOVs issued between July 1, 2024, through June 30, 2025, 33 resulted from complaints which is approximately 27%.

➤ Small Business Assistance Program

- SBAP staff responded to 2,326 requests for assistance (1,346 for permitting assistance and 980 for compliance assistance) from July 2024 through June 2025.
- Environmental Review/Analysis of agency air quality actions: approx. 250
- SBAP staff provided the following virtual workshops:
 - Preparing for a Minor Source Permit Inspection 7/23/2024
 - Air Quality Regulation (AQR) Updates 8/20/2024
 - Gasoline Dispensing Facility (GDF) Daily Inspections 9/17/2024
 - GDF New AQR and General Permit Renewal 10/8/2024
 - Annual Billing Checkup 10/22/2024
 - Gasoline Dispensing Facilities (GDF) Daily Inspections 11/19/2024
 - Completing Annual Reports for Minor Sources 1/21/2025
 - Gasoline Dispensing Operation (GDO) Daily Inspections 2/18/2025
 - Compliance Boot Camp for Minor Sources 3/18/2025
 - Permitting 101 for Minor Sources 5/20/2025
 - Gasoline Dispensing Facilities (GDF) Daily Inspections 6/17/2025
- The SBAP staff work primarily from the office. We are meeting with customers with walk-in questions, visiting their businesses, and continue offering assistance via phone calls, emails, and virtual meetings.

➤ Regulations Updates

- DES amended existing Air Quality Regulations (AQRs) and promulgated new AQRs to satisfy RACT and 15% ROP requirements for the 2015 O₃ Moderate Attainment SIP. DES also amended existing AQRs for various reasons including updating language for clarity and correcting citations.
 - Section 12.1, “Permitting Requirements for Minor Sources,” amendment effective 12/18/2024



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- Section 12.11, “General Permits for Minor Sources,” amendment effective 12/18/2024
- Section 13, “National Emission Standards for Hazardous Air Pollutants,” amendment effective 10/2/2024
- Section 14, “New Source Performance Standards,” latest amendment effective 2/19/2025
- Section 18, “Permit and Technical Service Fees,” amendment effective 1/30/2025
- Section 92, “Fugitive Dust Control Requirements for Unpaved Parking Lots and Storage Areas,” amendment effective 1/1/2025
- Section 94, “Permitting and Dust Control for Construction and Temporary Commercial Activities and Fugitive Dust Control at Stationary Sources,” amendment effective 1/1/2025
- Section 101, “VOC Emissions Controls for Industrial Adhesives Operations,” amendment effective 2/19/2025
- Section 102, “Gasoline Dispensing Facilities,” amendment effective 2/19/2025
- Section 103, “VOC Emissions Controls for Miscellaneous Metal or Plastic Parts Coating Operations,” amendment effective 2/19/2025
- Section 107, “VOC Emissions Control for Cutback Asphalt Manufacturing and Use,” amendment effective 2/19/2025
- Section 130, “Architectural and Industrial Maintenance (AIM) Coatings,” amendment effective 2/19/2025
- With the promulgation of several new AQRs, DES repealed now-redundant, existing AQRs.
 - Section 50, “Storage of Petroleum Products,” repeal effective 12/18/2024
 - Section 51, “Petroleum Product Loading into Tank Trucks and Trailers,” repeal effective 12/18/2024
- DES promulgated new AQRs to determine RACT for major stationary sources in ozone nonattainment areas and satisfy RACT requirements for the 2015 O3 Moderate Attainment SIP.
 - Section 120, “Reasonably Available Control Technology Demonstration and Determination Requirements for Major Stationary Sources in Ozone Nonattainment Areas,” adopted 12/3/2024, effective 12/18/2024
 - Section 121, “Reasonably Available Control Technology Determinations for Specific Major Stationary Sources in the 2015 8-Hour Ozone NAAQS Moderate Nonattainment Area HA 212,” adopted 2/4/2025, effective 2/19/2025



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- DES submitted SIP revision packets for AQR adoptions, amendments, and repeals to the Nevada Division of Environmental Protection who forwarded them to the Region 9 office of the U.S. Environmental Protection Agency for incorporation into the Nevada SIP.
 - Amendments to Sections 0, 12.0, 12.1, and 12.11 were submitted to NDEP on 1/6/2025 which were forwarded to EPA on 1/10/2025
 - Amendments to Sections 13.3, 14.2; adoption of Sections 102, 105, and 107; and the repeal of Sections 50, 51, 52, and 60 were submitted to NDEP on 3/5/2025 which were forwarded to EPA on 3/7/2025
- Adoptions of Sections 101, 103, 104, 106, 121, and 130 were submitted to NDEP on 3/5/2025 which were forwarded to EPA on 3/7/2025

➤ Office of Sustainability

- Hired a Principal Environmental Specialist to start in August 2025.
- Successfully obtained Department of Energy (DOE) designation for The Southern Nevada Clean Cities Coalition and continues to develop and implement actions related to clean fuels.
- Completed its summer 2025 ALL-IN Roadshow by sharing regional climate and sustainability progress with elected officials across the various jurisdictions in Clark County.
- Developed a home energy efficiency guide and accompanying resources to promote lower energy bills and increased energy efficiency for Clark County residents.
- Submitting its final deliverables for EPA's Climate Pollution Reduction Planning Grant funding, including updating the 2019 Greenhouse Gas Emissions inventory with 2022 data.
- Continues to lead Regional Climate Collaborative planning efforts and will host its 20th monthly meeting in August 2025.
- Continuing its second year of Community Canopy program, in partnership with the Arbor Day Foundation. The program provides approximately 4,500 trees annually to Clark County residents with priority given to heat-vulnerable residents.
- Continuing its climate ambassador program into FY 2026—reaching thousands of residents annually



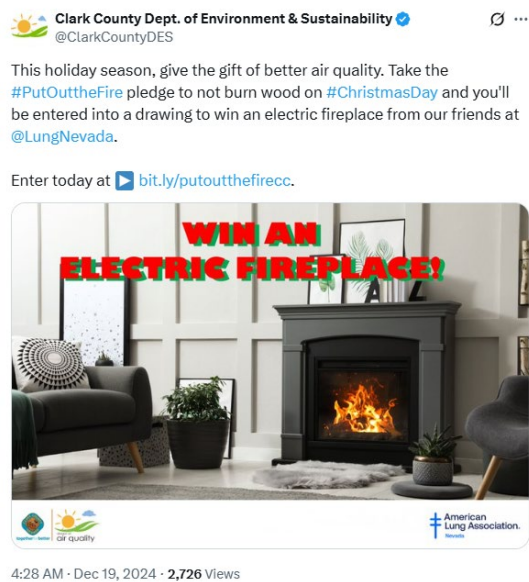
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➤ Public Information and Outreach

■ New Outreach/Awareness Campaign: Put Out the Fire

- In winter 2024, DES launched its inaugural Put Out the Fire awareness campaign in partnership with the American Lung Association in Nevada to reduce particulate matter pollution in Clark County during the holiday season. In addition to promoting online, we also promoted at public events and on local media.



- Put Out the Fire's reach:
 - Social media: more than 3,000
 - Website hits: More than 2,000
 - Entries into fireplace giveaway: 125
 - The greatest metric of all: we did not exceed for PM2.5 on Christmas Day for the first time since 2021!

■ Earned Media

- News releases. Since 1 July 2024, DES has issued 22 news releases and/or air quality advisories.
- Total mentions. DES has been mentioned and/or appeared in local media (print, radio, broadcast) more than 70 times, including:
 - Live, on-air promotion of initiatives
 - Interviews for various air quality and sustainability topics



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▪ Social Media

- Facebook
 - Reach: 20,614
 - Followers: +104
- Instagram
 - Reach: 52,169
 - Followers: +412
- Twitter
 - Reach: 112, 759
 - Followers: +53

▪ Promoted Social Media

- We sponsored several social media campaigns in 2025.

CAMPAIGN	MONTH	Link Clicks	Views	Reach	Budget	Cost per Link Click
Ad: Climate Survey	JAN	958	45852	45846	\$497.66	\$0.52
Desert Tortoise Health Screening	JAN	1361	136500	72495	\$497.41	\$0.37
Desert Conservation Virtual Meetings	JAN	309	30526	19631	\$143.81	\$0.47
All In Clark County Community Canopy Project (English)	MAR	819	38922	18705	\$247.59	\$0.30
All In Clark County Community Canopy Project (Spanish)	MAR	853	51334	21759	\$247.78	\$0.29
Mojave Max Emergence	FEB/MAR	2454	134200	68531	\$498.36	\$0.20
Cooling Stations (English)	MAY/JUN	955	36124	29459	\$248.99	\$0.26
Cooling Stations (Spanish)	MAY/JUN	517	42438	26512	\$248.99	\$0.48



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■ In-Person Outreach

- The Department of Environment & Sustainability partnered with the American Lung Association in Nevada for its full slate of 2024/25 events—Great Dam Ride, Scale the Strat and the Lung Force Walk—in addition to a partnership on our inaugural Put Out the Fire campaign to reduce particulate matter pollution during the winter holiday season. ALA Nevada graciously sponsored a prize giveaway of two electric fireplaces to people who registered online and at our December tabling events. In addition to fielding a team of climbers and riders, we also tabled at all three events.

- Cost for partnership: \$25,000.

Date	Event	Audience	Engagements
Sunday, November 10, 2024	ALA Great Dam Ride	General Public	100
Saturday, December 7, 2024	Park Grand Opening	General Public	75
Saturday, December 14, 2024	Pancakes n' PJs	Senior Citizens	50
Wednesday, December 18, 2024	Skatey 8 in the Dales	Families	50
Monday, December 30, 2024	Clark County Menorah Lighting	Local Faith Community	50
Sunday, February 23, 2025	ALA Scale the Strat	General Public	250
Saturday, April 19, 2025	ALA Lung Force Walk	General Public	100
Saturday, May 10, 2025	Take a Walk in Their Shoes	Families	150