



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Bradley Crowell, Director  
David Emme, Administrator

January 4, 2017

Alexis Strauss  
Acting Regional Administrator  
ORA-1, USEPA Region 9  
75 Hawthorne Street  
San Francisco, California 94105

**RE: Update on Recommended Area Designations for the 2010 Primary NAAQS for SO<sub>2</sub> (75 FR 35520, June 22, 2010) and Modeling Report for North Valmy Generating Station, Nevada, 2015 SO<sub>2</sub> Data Requirements Rule (40 CFR Part 51, Subpart BB)**

Dear Ms. Strauss:

On behalf of Governor Sandoval, as his appointed designee, pursuant to section 107(d)(1) of the 1990 Clean Air Act Amendments and the SO<sub>2</sub> Data Requirements Rule (DRR, August 21, 2015), I am submitting this letter with the updated recommendations for the **hydrographic area HA64** of the State of Nevada to be designated **unclassifiable**. Section 107(d)(1)(A)(iii) of the Clean Air Act states that an unclassifiable designation is appropriate for "any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant." The NDEP affirms that modeling is not an appropriate substitute for monitoring for attainment designations (Comments to DDR Docket EPA-HQ-OAR-2013-0711, July 14, 2014), and monitoring data are not available in HA64 to make an attainment or nonattainment designation. However, per the requirements of the SO<sub>2</sub> Data Requirements Rule (DRR, August 21, 2015), a modeling analysis was conducted for the North Valmy Generating Station (Valmy) located in HA64. The modeling results show that concentrations of SO<sub>2</sub> surrounding Valmy meet the NAAQS standard for SO<sub>2</sub> (see attached Air Dispersion Modeling Report).

If you should have any questions about this submittal or require additional clarification, you may contact Danilo Dragoni, Chief, Bureau of Air Quality Planning at (775) 687-9340.

Sincerely,

David Emme  
Administrator

Enclosure (1)

cc w enclosure:

Sheila Anderson, Management Analyst I, Office of the Governor  
Amy Zimpfer, Associate Director, Air Division, USEPA Region IX  
Scott Bohning, USEPA Region IX  
Gwen Yoshimura, USEPA Region IX

Anita Lee, USEPA Region IX  
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