

STATE OF NEVADA

Department of Conservation & Natural Resources

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

DIVISION OF ENVIRONMENTAL PROTECTION

Colleen Cripps, Ph.D., Administrator

April 3, 2012

Jared Blumenfeld
Regional Administrator
ORA-1, USEPA Region 9
75 Hawthorne Street
San Francisco CA 94105

RE: 2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide; Second 10-Year Limited Maintenance Plan for the Nevada Side of the Lake Tahoe Basin


Dear Mr. Blumenfeld:

On behalf of Governor Sandoval, as his appointed designee, this letter transmits to you one hard copy and one exact duplicate of the hard copy in electronic form of the *2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide: Second 10-Year Limited Maintenance Plan for the Nevada Side of the Lake Tahoe Basin* (CO Plan Revision). This state implementation plan (SIP) revision is submitted pursuant to section 175A of the Clean Air Act and addresses the requirement for a second plan for maintaining the CO NAAQS for 10 additional years after the expiration of the first 10-year maintenance period. Based on Nevada Revised Statutes 445B.205 and Nevada Administrative Code 445B.053, the Administrator of the Nevada Division of Environmental Protection (NDEP) has the authority to adopt and submit state implementation plans to the U.S. Environmental Protection Agency. I thereby adopt the CO Plan Revision and request approval of this submittal into the applicable Nevada SIP.

The CO Plan Revision was properly noticed and an opportunity for a public hearing was afforded. Evidence of compliance with the required consultation and public review processes is appended. A copy of the formal comments submitted on the CO Plan Revision and NDEP's response to those comments is included.

The enclosed CO Plan Revision includes notice that the NDEP intends to discontinue monitoring for CO at the Stateline, Nevada location. A separate request is being submitted to Matthew Lakin, Chief of the Air Quality Analysis Office in Region 9, to discontinue the Stateline CO monitor.

If you should have any questions about this submittal or require additional clarification, you may contact Rob Bamford, Chief, Bureau of Air Quality Planning at (775) 687-9330.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colleen Cripps', with a long horizontal flourish extending to the right.

Colleen Cripps, Ph.D.
Administrator

Enclosures

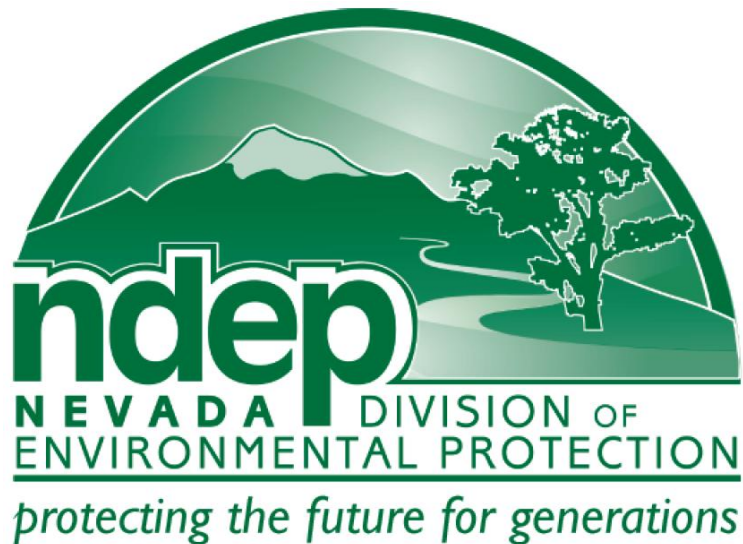
cc w/o enclosures:

Dale Erquiaga, Senior Advisor, Office of the Governor
Lisa Hanf, Chief, Planning Office, USEPA Region IX (AIR-2)
Kevin Dick, Director, Air Quality Management Division, Washoe County Health District

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Leo Drozdoff, Director, Nevada Department of Conservation and Natural Resources
Michael Elges, Deputy Administrator, NDEP
Rob Bamford, Chief, Bureau of Air Quality Planning, NDEP

2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide



Updated Limited Maintenance Plan for the **NEVADA SIDE OF THE LAKE TAHOE BASIN** Including Douglas, Carson City and Washoe Counties

Prepared by:

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April 2012

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1. BACKGROUND

Nevada's Lake Tahoe Basin (Basin) planning area is defined by the hydrographic area 90 boundaries and includes portions of Washoe, Carson City and Douglas Counties (Figure 1). In 2003, the Nevada Division of Environmental Protection (NDEP) adopted and submitted a carbon monoxide (CO) Limited Maintenance Plan (LMP) for the Basin and requested that the Basin be redesignated to attainment for the federal 8-hour CO standard. The United States Environmental Protection Agency (USEPA) approved the LMP as a revision to Nevada's applicable state implementation plan (SIP) and formally redesignated the Basin to attainment, effective February 13, 2004 (68FR69611).

The approved LMP covers the period from February 13, 2004 through February 13, 2014. It includes monitoring data from 1989 through 2002, showing that the Basin had not exceeded the 8-hour CO standard during that time period; the Nevada side of the Basin has never violated the 1-hour standard. The LMP also demonstrated that the Basin would continue to attain the standard through 2014. Section 175A of the Clean Air Act (CAA) requires the initial maintenance plan to cover at least a ten-year period after redesignation, with a second SIP revision due within eight years of redesignation to demonstrate that the area will maintain the standard for another ten years (i.e., a full 20 years from the date of redesignation to attainment, or 2024 in this case).

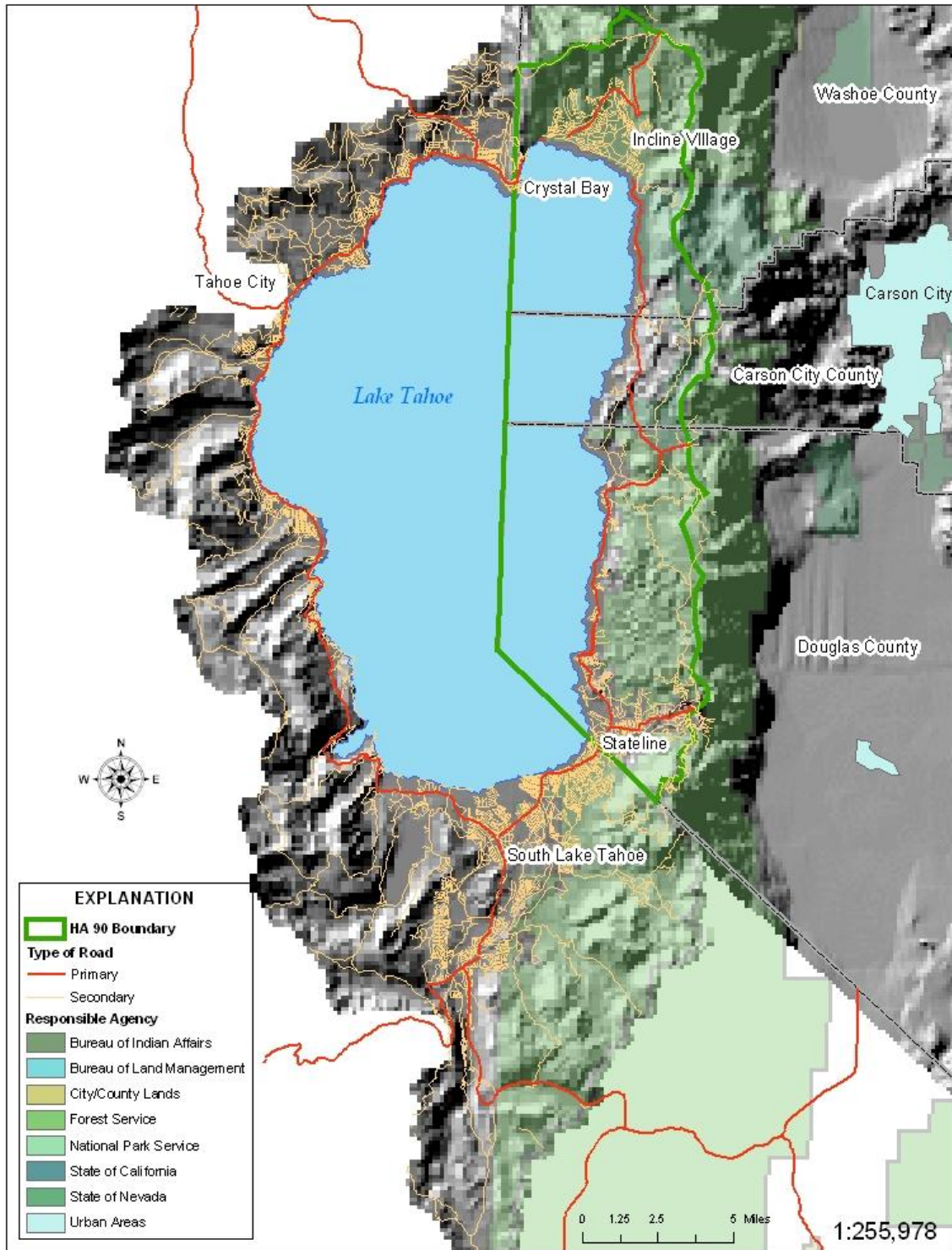
This proposed 2012 LMP revision to the Nevada CO SIP fulfills the section 175A requirement to submit an additional revision of the applicable SIP for maintaining the national primary CO ambient air quality standard from 2014 through 2024. Having already satisfied the five CAA requirements for redesignation (§107(d)(3)(E)), this revision focuses on updating the fifth element by extending the maintenance plan through 2024. This SIP revision includes:

- A maintenance demonstration; air quality data that demonstrate the Basin has been in attainment for the past 33 years and continues to be in attainment.
- Means to verify the attainment status of the redesignated area through 2024.
- Contingency provisions to assure that the State will promptly correct any violation of the standard that may occur after the redesignation of the area as an attainment area.

Projected emissions of CO from 2014 through 2024 are not included. Before the redesignation in 2004, the Basin was designated "nonclassifiable nonattainment" for CO. USEPA guidance provides that for nonclassifiable nonattainment areas using USEPA's LMP approach, a design value that is equal to or below 7.65 ppm is a satisfactory maintenance demonstration; there is no requirement to project emissions over the maintenance period (USEPA guidance memorandum, "Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas," Joseph Paisie, Office of Air Quality and Planning Standards, October 6, 1995). The Nevada side of the Lake Tahoe Basin meets this criterion.

FIGURE 1

LAKE TAHOE BASIN PLANNING AREA



2. MAINTENANCE DEMONSTRATION

The 2012 LMP update relies on a history of clean data to demonstrate maintenance of the CO standard through 2024. Monitoring data show that CO levels in the Basin have been under 80 percent of the CO NAAQS for 33 years, with a clear downward trend.

USEPA guidance states that nonclassifiable CO nonattainment areas seeking redesignation to attainment whose design values are at or below 7.65 ppm (85 percent of the CO NAAQS) at the time of redesignation may choose to submit a less rigorous maintenance plan than was formerly required (USEPA guidance memorandum, “Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas,” Joseph Paisie, Office of Air Quality and Planning Standards, October 6, 1995). This “limited maintenance plan” option was selected for the Nevada side of the Basin. Based on data from Stateline, Nevada, (Table 1) for calendar years 2009-2010 the 8-hour average CO design value is 3.1 ppm (Table 2), substantially under the required maximum of 7.65 ppm and substantially lower than the 6.1 design value in the initial 10-year LMP submitted in 2003. Therefore, there is no requirement to project emissions over the 2014-2024 limited maintenance plan period.

2.1 Monitoring Data

The Nevada side of the Basin has one State and Local Air Monitoring Station (SLAMS) located in Stateline at the southern edge of Lake Tahoe (Figure 2). Stateline, together with the adjacent city of South Lake Tahoe in California, represents the most highly populated area in the Basin. The SLAMS site was located at the Horizon Casino Resort (previously owned by the Sahara Hotel and later the High Sierra Hotel between 1975 and 1982) until mid-1999. It was then relocated and installed at Harvey’s Resort and Hotel as a “microscale” site for CO in the core of the Stateline casino hotel area. The Harvey’s site is designed to monitor the highest CO concentrations in the south shore casino district.

Table 1 shows the first and second highest non-overlapping, eight-hour average monitoring data from the Horizon/Sahara/High Sierra site from 1975 through June 1999 and from the Harvey’s site from October 1999 through December 2011. These data are recorded in USEPA’s Air Quality System (AQS) data base. The data were collected and quality assured in accordance with 40 CFR 58 and support continued attainment of the CO NAAQS in accordance with 40 CFR 50.8.

It is evident from Table 1 that the eight-hour CO NAAQS has not been violated in the Basin in the last 33 years. The Basin was designated nonattainment for CO on November 25, 1977, based on 1976 monitoring data. By 1979, the Basin was attaining the standard. From 1979 on, there have been no exceedances of the CO NAAQS.

TABLE 1

MONITORING DATA FROM STATELINE, 1975-2011:
EIGHT-HOUR NON-OVERLAPPING AVERAGE CO CONCENTRATIONS (ppm)

Year	1 st High	2 nd High	Federal Exceedances
Sahara Hotel/High Sierra Hotel ID#32-005-0002 (roof of the Sahara Hotel ballroom); 32-005-0003 (parking lot of the Sahara/High Sierra Hotel)			
1975	14.8	11.5	6
1976	10.9	10.0	4
1977	13.6	12.1	13
1978	10.6	10.3	4
1979	5.1	4.8	0
1980	7.3	7.1	0
1981	7.1	6.6	0
Horizon Casino Resort, Middle Scale Site ID# 32-005-0004 (SLAMS)			
1982	7.3	7.0	0
1983	3.6	3.5	0
1984	6.8	6.6	0
1985	6.7	6.2	0
1986	6.5	6.4	0
1987	5.4	5.2	0
1988	4.0	3.9	0
1989	5.4	4.8	0
1990 ^a	5.0	4.1	0
1991	3.7	3.4	0
1992	3.4	3.2	0
1993	3.7	3.6	0
1994	3.6	2.8	0
1995	2.6	2.5	0
1996	2.3	2.1	0
1997	1.8	1.7	0
1998	1.9	1.8	0
1999 ^b	2.1	2.0	0
Harvey's Resort and Hotel, Microscale Site ID# 32-005-0009 (SLAMS)			
1999 ^c	4.6	4.3	0
2000	4.4	4.2	0
2001	3.7	3.6	0
2002	8.8 ^d	6.1	0
2003	7.3 ^e	6.5	0
2004	4.4	4.4	0
2005	3.8	3.6	0
2006	3.1	3.0	0
2007	4.5	3.7	0
2008	2.5	2.4	0
2009	3.4	2.6	0
2010	3.3	3.1	0
2011	3.3	2.7	0

^a Power disruptions due to construction & vandalism: incomplete year.

^b Data for January - June; discontinued monitoring at this site after June 1999.

^c New site: 1999 data were collected for October-December only.

^d This average occurred on Friday, July 5 from 12:00 midnight to 7:00 a.m. PDT. Possible causes include: post-fireworks traffic congestion; weather conditions favorable to pollutant build-up; and the Heavenly Gondola fire beginning July 3rd.

^e This average occurred on the Sunday after a popular holiday period when many tourists were leaving the Basin, resulting in increased congestion at Stateline.

Source: State of Nevada, Bureau of Air Quality (Planning), *Trend Reports*, 1980-2010 and USEPA AQS Quick Look Reports.

Table 2 shows design values from 1975 through 2011 and the percent of the level of the 8-hour standard, while Figure 3 shows air quality trends over the same period.

TABLE 2

DESIGN VALUES FOR THE FEDERAL 8-HOUR CO STANDARD (ppm)^a

Years	Design Value	Percent of the 8-hour Standard
1975-76	11.5	128
1976-77	12.1	134
1977-78	12.1	134
1978-79	10.3	114
1979-80	7.1	79
1980-81	7.1	79
1981-82	7.0	78
1982-83	7.0	78
1983-84	6.6	73
1984-85	6.6	73
1985-86	6.4	71
1986-87	6.4	71
1987-88	5.2	58
1988-89	4.8	53
1989-90	4.8	53
1990-91	4.1	46
1991-92	3.4	38
1992-93	3.6	40
1993-94	3.6	40
1994-95	2.8	31
1995-96	2.5	28
1996-97	2.1	23
1997-98	1.8	20
The site was relocated in mid-1999. The new site meets microscale criteria (less than 10 meters from Highway 50), resulting in higher monitored concentrations.		
1998-99 ^b	4.3	48
1999-00 ^b	4.3	48
2000-01	4.2 ^c	47
2001-02	6.1 ^c	68
2002-03	6.5	72
2003-04	6.5	72
2004-05	4.4	49

2005-06	3.6	40
2006-07	3.7	41
2007-08	3.7	41
2008-09	2.6	29
2009-10	3.1	34
2010-11	3.1	34

^a The design value is the highest of the second highest eight-hour concentrations observed at any site in the area in a two year period and is the value on which the determination of attainment or nonattainment is based.

^b January - June 1999 data were collected at the Horizon site, while October - December data were collected from the Harvey's microscale site.

^c Affected by the Star Fire, El Dorado National Forest, 8/28-29/01.

FIGURE 2

LOCATION OF HARVEY'S MONITORING SITE AT STATELINE



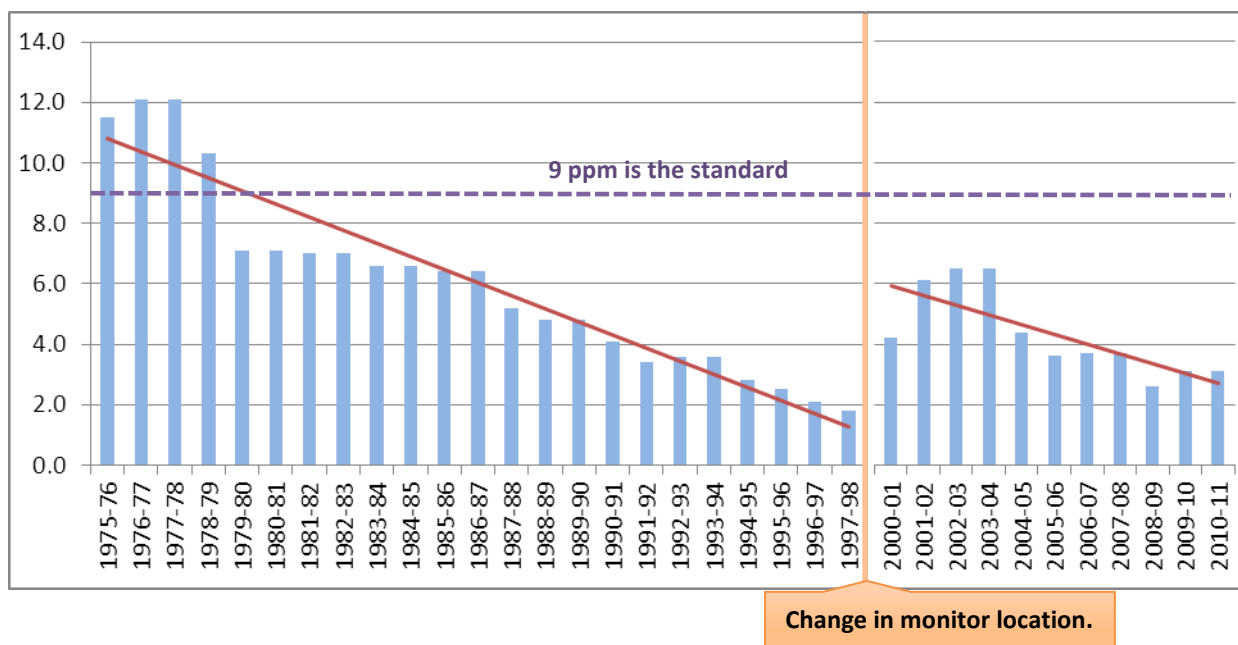
South Lake Tahoe Digital Ortho Photo Quad, USGS, 1992
State Boundary, Nevada Department of Transportation, 2002

2.2 Air Quality Trends

Figure 3 shows a clear downward trend in CO levels measured at the Horizon site from 1979 to 1998. That site was located in a parking lot behind buildings that fronted on Highway 50 (Figure 4). In June of 1999, the Horizon site was closed. Since motor vehicles are the major contributor to CO pollution in the area, a new site was located at Harvey’s Resort and Hotel to meet microscale criteria, i.e., located in a street canyon/corridor between 2 and 10 meters from the edge of the nearest traffic lane. The Harvey’s site is located on the 1st level of Harvey’s parking garage facing Highway 50 (Figure 4).

FIGURE 3

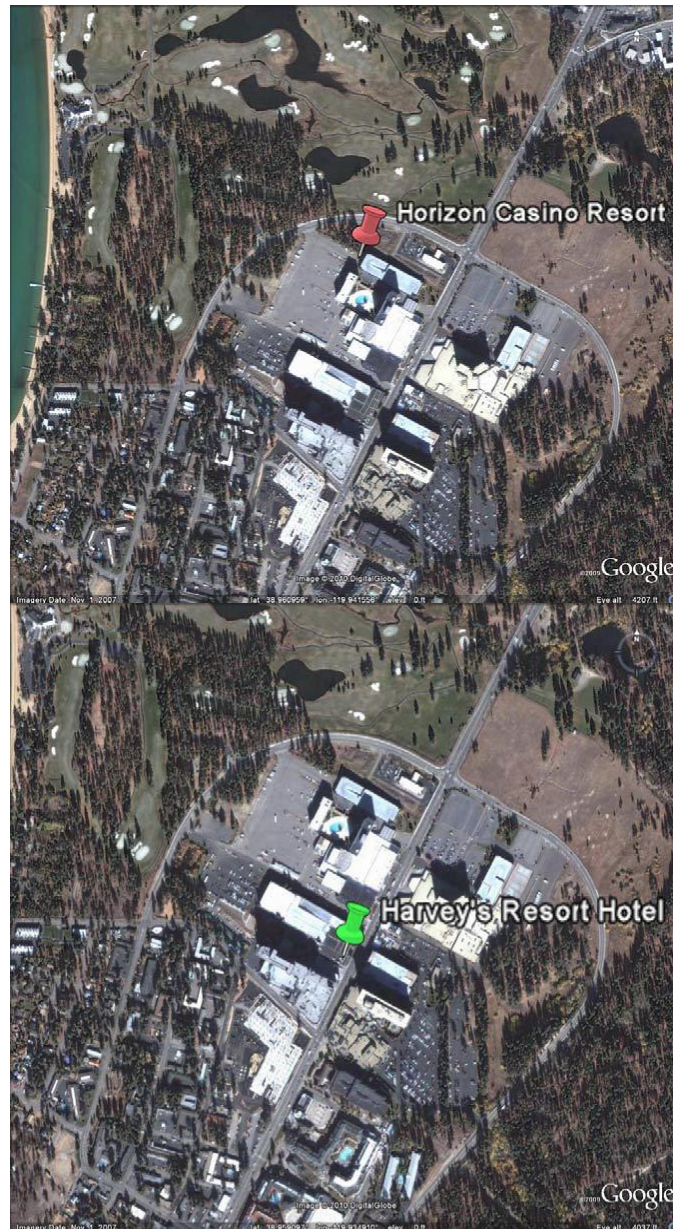
CO DESIGN VALUE TRENDS, TAHOE BASIN, 1975-2011



The Harvey’s site also shows a long term trend of decreasing design values from 2000-2011. The relocation and redesign of the site contribute to the rise in measured CO concentrations beginning in 2000. The higher design values for 2001-2002 through 2003-2004 may be attributed to exceptional events occurring in those years, including wild fires, holiday traffic and conditions surrounding Fourth of July celebrations in 2002. Nevertheless, CO design values for the Basin have declined 30 to 50 percent from the 2002-2003 values to the present. For the past six years, values have been between 2.6 – 3.7 ppm, well below the federal standard.

FIGURE 4

MONITORING SITE COMPARISON



The USEPA has stated that if an area begins the maintenance period at or below 85 percent of exceedance levels, the air quality along with the continued applicability of PSD requirements, any control measures already in the SIP, and federal measures should provide adequate assurance of maintenance over the initial 10-year maintenance period (USEPA guidance memorandum, “Limited Maintenance Plan Option for Nonclassifiable CO Nonattainment Areas,” Joseph Paisie, Office of Air Quality and Planning Standards, October 6, 1995). It is reasonable to assume that this line of reasoning applies to the second 10-year LMP as well. The Basin remains well below 85 percent of exceedance levels with design values under 50 percent of the NAAQS since 2004.

2.3 Monitoring Commitment

The NDEP plans to discontinue CO monitoring at Stateline (located at Harvey's Resort and Hotel on Hwy 50) by June 30, 2012. The NDEP concludes that 33 years of clean data, all of it under 80 percent of the NAAQS and most recently at 34 percent, with on-going downward trends is sufficient evidence of continued attainment through 2024 and, together with the discussion and commitments in Section 3, Verification of Continued Attainment, satisfies 40 CFR 58.14 requirements for discontinuance. USEPA maintains that, ". . . regional office experience has demonstrated that CO monitors can be discontinued even if referenced in maintenance plans and SIPs." (EPA OAQPS power point presentation, "OAQPS Update on Emerging Monitoring Issues," by Chet Wayland and Lewis Weinstock, for WESTAR Council call, January 11, 2012) Further, the State/EPA Workgroup on Work Prioritization notes that, "EPA recognizes that technical, policy, and political considerations can impact the ability to discontinue monitors. Given this reality, EPA and states need to work together to weigh resources in light of revised monitoring requirements, and make appropriate judgments to divest of monitoring assets viewed as low-value." (State/EPA Workgroup on Work Prioritization paper, "Top 10 opportunities for greater efficiency or reduced burden without compromising public health," item 1.c, December 23, 2011)

Continued operation and maintenance of the site would cost on average about \$20,000 a year; additionally, it is likely that the existing 1983 analyzer would have to be replaced before 2024, costing another \$25,000 to \$30,000. The NDEP considers continued CO monitoring at Stateline to be low-value and, instead, will allocate its limited resources to higher priority projects.

3. VERIFICATION OF CONTINUED ATTAINMENT

3.1 Population Data

The Tahoe Regional Planning Agency (TRPA) is the planning agency for the Basin. Population growth in the Basin is tightly controlled by the TRPA (TRPA Code of Ordinances, Chapter 33). Population estimates for the towns on the Nevada side of the Basin were taken from the U.S. Census Bureau and the Nevada State Demographer (Table 3). The largest population center located totally within the Nevada side of the Basin is the Incline Village-Crystal Bay area of Washoe County. According to the 2010 census, the population of this area is 9,087. Incline Village and Crystal Bay are primarily residential and resort communities along the California state line on the north end of Lake Tahoe.

The other population centers along the Nevada shore are in Douglas County. From north to south, these include Glenbrook with a population of 215, Zephyr Cove with 1,324, Kingsbury with 2,152 and Stateline with 842. The total Douglas County population in the Basin, including outlying areas, according to the 2010 census is 5,402. The Carson City County area within the Basin is considered a rural area with a very minimal population. There are no towns in this area. It was not a "census designated place" in the 2010 census and does not have any population estimates available. Any existing population is expected to remain essentially stable in this rural area.

Altogether, the population on the Nevada side of the Basin was estimated at 14,489 in 2010, a decrease of 13.2 percent from 2000. The population on the California side of South Lake Tahoe declined over the 2000-2010 period as well.

TABLE 3
LAKE TAHOE BASIN POPULATION DATA

Geographic Levels Reported: State; County; Census County Division (CCD); Census Designated Place (CDP).

	2010	2000	1990	1980	1970	1960
Nevada	2,700,551	1,998,257	1,201,833	800,493	488,738	285,278
Douglas County	46,997	41,259	27,637	19,421	6,882	3,481
Zephyr Cove CCD ^a	5,402	6,739	6,115	5,368	3,015	1,017
Glenbrook CDP ^b	215					
Kingsbury CDP	2,152	2,624	2,238	2,695		
Zephyr Cove-Round Hill Village CDP	1,324	1,649	1,434	1,316		
Stateline CDP ^c	842	1,215	1,379			
Washoe County	421,407	339,486	254,667	193,623	121,068	84,743
Incline Village CCD ^d	9,087	9,952	7,567			
Incline Village-Crystal Bay CDP ^e	9,082	9,952	7,119	6,225		
California	37,253,956	33,871,648	29,760,021	23,667,902	19,953,134	15,717,204
Eldorado County	181,058	156,299	125,995	85,812	43,833	29,390
South Lake Tahoe CCD ^f	30,728	34,042	29,552	27,471	14,919	7,897
South Lake Tahoe City	21,403	23,609	21,588	20,681	12,921	

^a Zephyr Cove CCD began in 1990; prior to that it appears to be the Tahoe Township.

^b Glenbrook CDP began in 2010.

^c Stateline CDP began in 1990.

^d Incline Village CCD began in 1990.

^e Incline Village CDP first appears in 1980. Prior to that there are no geographic units assigned to the Washoe County portion of Lake Tahoe.

^f Boundaries for the Census County Divisions were revised in 1980; prior to that the CCD was the Lake Valley Division. Though not exactly the same, it approximates the same area.

Source: U.S. Census Bureau 2010 Census and Jeff Hardcastle, Nevada State Demographer, April 19 & 20, 2011 e-mails.

3.2 Indicators

3.2.1 Emissions Inventory

Local CO levels and national trends for CO concentrations confirm that CO levels in the Basin will remain significantly below federal health standards into the future. On an annual basis, the NDEP provides CO point source emissions data to the USEPA as part of the National Emission Inventory (NEI) process. Additionally, every third year the NDEP provides emission model inputs that allow the USEPA to calculate a comprehensive emissions inventory, including CO

emissions from on-road and non-road mobile sources. These inventories will indicate whether levels of CO in Nevada generally are remaining constant or changing.

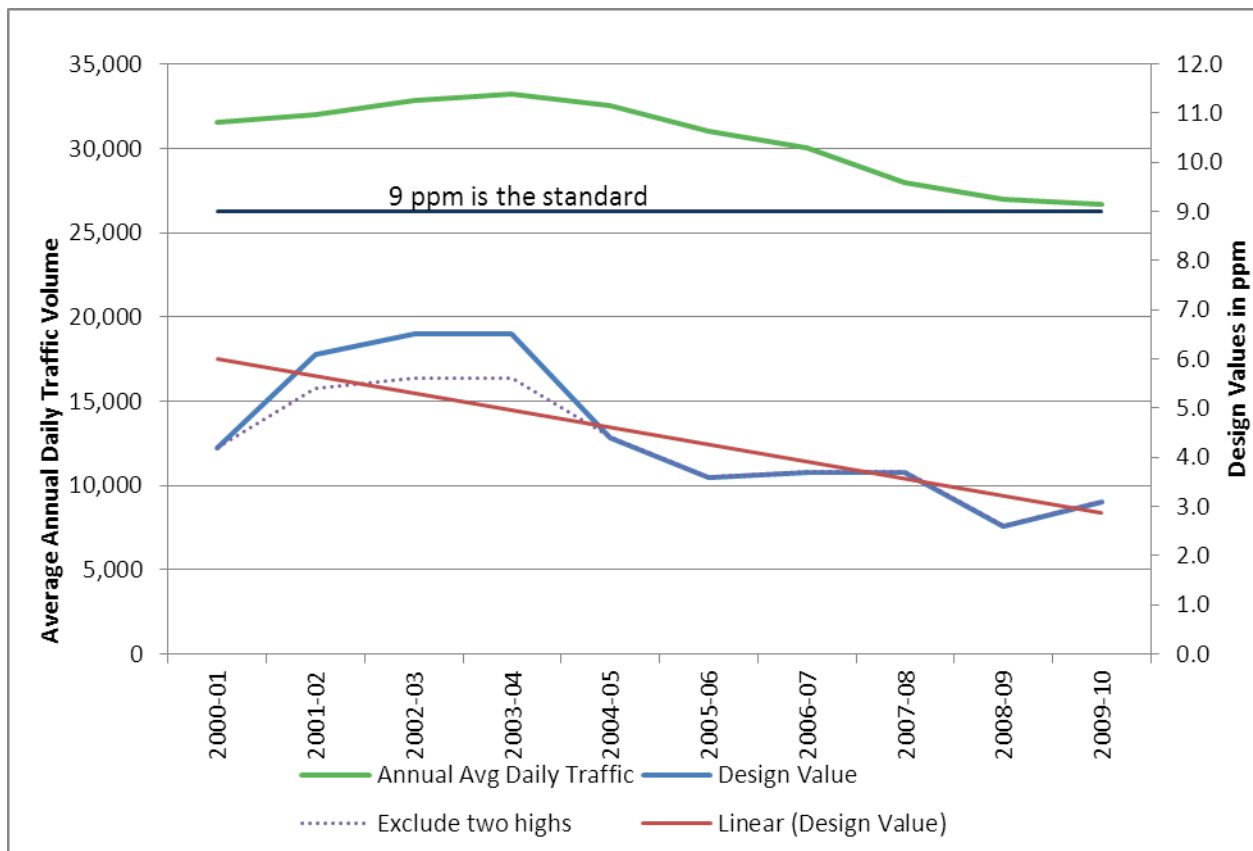
3.2.2 Traffic Volumes

The TRPA is responsible, among other things, for transportation planning in the Lake Tahoe Basin. In 2008, the TRPA published *Mobility 2030: Lake Tahoe Regional Transportation Plan* (http://www.trpa.org/documents/docdwnlds/rtp_final.pdf, August 27, 2008). Based on growth assumptions in the report, Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT) were modeled for the 2012, 2017, 2022 and 2030 forecast time periods. VMT and VHT are expected to increase by 15.31 and 16.27 percent, respectively, over the forecast period, with the midday time period representing the greatest percentage (40 percent) of travel during the day. Given that the design value for CO at Stateline would have to almost triple to violate the NAAQS, while the VMT is only expected to increase by about 15 percent by 2030, it is a safe assumption that continued monitoring is not necessary.

Vehicle miles traveled is an indicator of growth and can be used as a surrogate for monitoring CO concentrations in the Basin. Figure 5 shows CO design values and annual average daily traffic (AADT) for the period 2001 through 2010.

FIGURE 5

CO DESIGN VALUES AND AADT AT STATELINE, 2001-2010



The three highest design values over the 10-year period from 2001 to 2010 can be attributed to CO concentrations occurring in 2002 and 2003 (see Table 1). The highest 8-hour average in 2002 occurred on July 5 from midnight to 7:00 a.m. PDT. Possible causes include post-fireworks traffic congestion; weather conditions favorable to pollutant build-up; and the Heavenly Gondola fire beginning July 3rd. USEPA's 2007 rule, *Treatment of Data Influenced by Exceptional Events*, suggests that emissions due to fireworks may be treated in a manner similar to the treatment of exceptional events. In 2003, the highest 8-hour average occurred on February 23 from 7:00 a.m. to 3:00 p.m. PST. This was a Sunday following the Presidents Day holiday when many tourists were leaving the Basin, resulting in increased congestion at Stateline. This value has not been investigated, since it is still less than 85 percent of the NAAQS; however, it is unusual in that no similar values occurred at any other time during the 10-year period. The next highest CO value monitored at Stateline was 4.5 ppm. These two events have likely skewed the design values upward for 2001-2002, 2002-2003 and 2003-2004. If these two first highs were omitted, the design values for 2001-2002, 2002-2003 and 2003-2004 would change from 6.1, 6.5 and 6.5 to 5.4, 5.6 and 5.6 ppm, respectively, and the design value line would parallel the AADT line even more closely (see dotted line in Figure 5).

The decrease in CO shown in Figure 5 may be attributed not only to a decrease in AADT, but more importantly to the continued strengthening of federal and California motor vehicle control measures over that period. Prior to 1991, there were federal CO standards for passenger cars only (Tier 0). The Tier I standard was adopted in 1991 and phased in from 1994 to 1997. Tier I expanded on Tier 0 by including light trucks. Figure 3 confirms the downward trend in CO design values during that period. The Tier II standards were phased in from 2004 to 2009 and applied to even more categories of vehicles. As the vehicle fleet in the Basin turns over and more older vehicles drop out, CO emissions will continue to decline.

The Nevada side of the Basin also benefits from California's ongoing motor vehicle program, including low-emission vehicles (LEV) and clean fuels programs. California's LEV program requires automobile manufacturers to meet more stringent new vehicle emission standards than are required under federal rules for vehicles sold in California. Because California and Nevada share the Basin, a significant portion of the vehicles driven on the Nevada side are registered in California and meet California's LEV standards. Furthermore, in order to be compatible with California regulations most of the vehicles sold in the Basin, whether for California or Nevada registration, meet the tighter California emission ratings.

California Tier I/LEV standards were in effect from the 1990s to 2003. California LEV II regulations were phased-in through model years 2004-2010. LEV II standards range from 1.0 to 4.2 grams per mile across three emission categories and are about three times tighter than federal CO standards. Both the federal and California motor vehicle control measures are permanent and enforceable.

3.2.3 Meteorological Data

In addition to AADT, meteorological conditions also affect CO concentrations. Meteorological data are available in the Basin from the National Oceanographic and Atmospheric

Administration (NOAA) at the South Lake Tahoe airport. Figure 6 shows the location of the airport relative to the monitor site. The airport is approximately 5 ½ miles from the monitor.

FIGURE 6

METEOROLOGICAL DATA COLLECTION SITE



In general, one would expect higher CO values under low wind, wintertime temperature inversion conditions. Because design values are based on the second highest 8-hour average CO concentration,¹ we looked at the available wind speed data for the days on which these values occurred for each year from 2001 through 2011. As shown in Table 4, wind speeds on these days range from 1.3 miles per hour (mph) to 6.0 mph with an average of 3 mph. Despite these low wind conditions, the data clearly show CO values well below the standard (Table 2).

TABLE 4

WIND SPEEDS ON HIGH CO DAYS

Date	2nd High 8-Hour Average CO Concentration	Hours the 2nd High Occurred	Average Daily Wind Speed (mph)*
19 Mar 2001	3.6	0800-1500	3.1

¹ The design value is the highest of the second highest eight-hour concentrations observed at any site in the area in a two year period and is the value on which the determination of attainment or nonattainment is based.

Date	2 nd High 8-Hour Average CO Concentration	Hours the 2 nd High Occurred	Average Daily Wind Speed (mph)*
8 Dec 2002	6.1	0900-1600	2.0
19 Jan 2003	6.5	0800-1500	2.7
11 Dec 2004	4.4	0600-1300	2.7
3 Mar 2005	3.6	1000-1700	3.8
23 Aug 2006	3	0200-0900	6.0
30 Apr 2007	3.7	1200-1900	4.5
11 Jul 2008	2.4	0600-1300	2.4
2 Feb 2009	2.6	0600-1300	2.0
10 Oct 2010	3.1	0900-1600	1.3
27 Sep 2011	2.7	0700-1400	2.5

*Source of wind speed data: South Lake Tahoe airport, NOAA Station GHCND: USW00093230. Only daily wind speeds are available.

3.2.4 Surrogate Monitoring Method

To use AADT as a surrogate CO monitoring method, the NDEP will conduct an annual review of the traffic volumes in the Basin using the data from the Nevada Department of Transportation's permanent automatic traffic recorders in Stateline and Incline Village. The NDEP will compare the latest rolling 3-year average of the AADT volumes against the baseline AADT average established by the traffic volume data collected during 2008-2010. Table 5 shows AADT counts in Stateline and Incline Village from 2001 through 2010. The baseline traffic volumes for the 2008- 2010 time period are, 1) Stateline: 27,233; and 2) Incline Village: 11,933.

TABLE 5

ANNUAL AVERAGE DAILY TRAFFIC COUNTS

Location	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Douglas County, station 0052110 in Stateline, NV										
US 50 0.6 mi east of the state line	31,580	32,101	32,840	33,205	32,500	31,000	30,000	28,000	27,000	26,700
Washoe County, station 0312240 in Incline Village, NV										
SR 28 0.2 mi N. of Lake Shore Drive	14,040	14,230	14,310	14,067	13,500	13,400	13,000	12,000	11,800	12,000

Source: Nevada Department of Transportation *2010 Annual Traffic Report*, Douglas and Washoe Counties. [http://www.nevadadot.com/About NDOT/NDOT Divisions/Planning/Traffic/2010 Annual Traffic Report.aspx](http://www.nevadadot.com/About%20NDOT/NDOT%20Divisions/Planning/Traffic/2010%20Annual%20Traffic%20Report.aspx)

If the AADT count increases by more than 25 percent when comparing the most recent, consecutive rolling 3-year averaging period to the baseline period, then the state will conduct a CO monitoring study during the next CO season using the Harvey's monitor to determine the actual CO levels in the ambient air. Trigger levels would be 34,041 for the Stateline AADT and 14,916 for the Incline Village AADT. If the percent increase is not greater than 25 percent, then it will be assumed that the ambient CO concentrations in the affected area have remained

relatively unchanged. The AADT data review process will be repeated in the spring of each year during the annual monitoring network review, and the new rolling 3-year average will be compared to the baseline average from 2008-2010.

3.3 State Authority

The State has the legal authority to implement and enforce all measures necessary to maintain the CO NAAQS. The State has enforceable emission limitations; delegation of the federal PSD program; preconstruction review of new major stationary sources and modification of existing ones; adequate funding for all staff and resources; and authority to require all major sources to monitor and report.

4. CONTINGENCY MEASURES

One of the federal CAA requirements for maintenance plans is to identify contingency measures to offset any unexpected increases in emissions and ensure maintenance of the standard (CAA 175A). The NDEP is committed to ensuring implementation of all applicable CAA programs that will ensure compliance with the CO NAAQS. If these programs should prove to be insufficient, the State of Nevada will address any violation of the CO standard through the adoption and implementation of control measures as necessary, in consultation with the other jurisdictions involved in air quality control activities on the Nevada side of the Basin (TRPA, Nevada Department of Transportation and the Washoe County District Health Department). This approach was used in Nevada's maintenance plan for the sulfur dioxide NAAQS in the Central Steptoe Valley, approved by USEPA on April 2, 2002 (67 FR 17939). Together with future reductions in CO emissions associated with fleet turnover, the NDEP's commitment provides an ample margin of safety to maintain the CO standard on the Nevada side of the Lake Tahoe Basin.

5. TRANSPORTATION CONFORMITY REQUIREMENTS

Under the transportation conformity rule (40 CFR 93 subpart A) and the general conformity rule (40 CFR 93 subpart B), one means of demonstrating conformity is to show that expected emissions from planned actions are consistent with the emissions budget for the area. USEPA guidance asserts that in limited maintenance plan areas emissions budgets may be treated as essentially not constraining for the initial 10-year maintenance period because the area is unlikely to grow enough that a violation of the NAAQS would occur. In other words, emissions need not be capped for the maintenance period. It follows, then, that any actions requiring transportation or general conformity determinations can either be considered to satisfy the budget test, or conversely, the budget test does not apply. The NDEP believes that it is reasonable to assume that this determination also applies to the second 10-year limited maintenance plan period.

APPENDIX

EVIDENCE OF PUBLIC PARTICIPATION; PUBLIC COMMENTS AND NEVADA'S RESPONSE

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**NOTICE OF PUBLIC COMMENT PERIOD BEGINNING JANUARY 30, 2012
AND A PUBLIC HEARING ON MARCH 1, 2012, IF REQUESTED**

conducted by the
Nevada Division of Environmental Protection
Bureau of Air Quality Planning

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Persons wishing to comment on the proposed CO plan update or to request a public hearing should submit their comments or request **in writing** either in person or by mail or fax to Adele Malone at the above address or by FAX at (775) 687-6396. ***A request for a hearing must be received by February 24, 2012. Written comments will be received by the NDEP until March 1, 2012 and will be retained and considered.***

Upon receipt of a valid written request, the NDEP will hold a public hearing in Carson City on:

**March 1, 2012
10:00 a.m. to 12:00 p.m.
NDEP Conference Center (Rm. 5001), 5th Floor
9001 South Stewart Street
Carson City, Nevada**

An agenda will be posted on the NDEP web site at least 3 working days before the hearing. Oral comments will be received at the Hearing. If no request for a public hearing is received by February 24, 2011, the hearing will be cancelled. Persons may check on the status of the hearing on the NDEP web site at <http://ndep.nv.gov/admin/public.htm>, click on "Air Quality Planning," or you may call the NDEP Bureau of Air Quality Planning at (775) 687-9349.

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COUNTY OF WASHOE

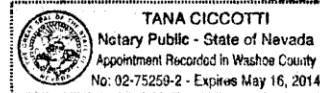
Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the dates: **01/30/2012 - 01/30/2012**, for exact publication dates please see last line of Proof of Publication below.

Signed: _____

Gina Briles

JAN 30 2012

Subscribed and sworn to before me



Tana Ciccotti

Proof of Publication

NOTICE OF PUBLIC COMMENT PERIOD BEGINNING JANUARY 30, 2012 AND A PUBLIC HEARING ON MARCH 1, 2012, IF REQUESTED conducted by the Nevada Division of Environmental Protection Bureau of Air Quality Planning Pursuant to the public hearing requirements in Title 40 of the Code of Federal Regulations Part 51 section 102, the Nevada Division of Environmental Protection (NDEP) is issuing the following notice. In 2003, the NDEP adopted and submitted a revision to the Nevada State Implementation Plan (SIP) requesting that Nevada's side of the Lake Tahoe Basin (Basin) be redesignated as attainment for the federal 8-hour federal 8-hour CO standard. As part of the redesignation request, the NDEP submitted a limited maintenance plan demonstrating that the Basin would not exceed the federal 8-hour CO standard for at least ten years. The U.S. Environmental Protection Agency approved Nevada's Plan and redesignated the Nevada side of the Basin attainment effective February 13, 2004. Section 175A of the Clean Air Act requires the initial maintenance plan to cover at least a ten-year period after redesignation, with a second plan revision due within eight years of redesignation to demonstrate that the area will maintain the standard for another ten years (i.e., a full 20 years from the date of redesignation to attainment, or 2024 in this case). The NDEP has drafted a revision to the Nevada SIP updating the CO limited maintenance plan to meet the

Ad Number: 1000771937

Page 1 of 2

**NOTICE OF PUBLIC COMMENT PERIOD BEGINNING
JANUARY 24, 2012
AND A PUBLIC HEARING ON MARCH 1, 2012, IF
REQUESTED**

conducted by the
Nevada Division of Environmental Protection
Bureau of Air Quality Planning

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March 1, 2012
10:00 a.m. to 12:00 p.m.
NDEP Conference Center (Rm. 5001), 5th Floor
901 South Stewart Street
Carson City, Nevada

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No. 771937 Jan 30, 2012

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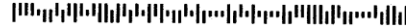
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NOTICE OF PUBLIC COMMENT PERIOD BEGINNING JANUARY 30, 2012 AND A PUBLIC HEARING ON MARCH 1, 2012, IF REQUESTED

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Nevada Division of Environmental Protection
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Attn: Linda Wilson

Rachel Renaud says:

That (s)he is a legal clerk of the **NORTH LAKE TAHOE BONANZA**, a bi-weekly newspaper published at Incline Village, in the State of Nevada.

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Notary Public

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**NOTICE OF PUBLIC COMMENT PERIOD BEGINNING JANUARY 30, 2012
AND A PUBLIC HEARING ON MARCH 1, 2012, IF REQUESTED**

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Bureau of Air Quality Planning

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9001 South Stewart Street
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Pub: January 26, 2012

Ad#7484537

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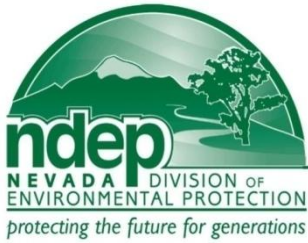
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the North Lake Tahoe
Bonanza Thursday
January 26. Correct
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hearing in Carson City on
March 1, 2012

10:00 a.m. to 12:00 p.m.

NDEP Conference
Center (Rm. 5001), 5th
Floor

901 S. Stewart Street
Carson City, Nevada

Pub: February 2, 2012
Ad#7496605



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

NOTICE OF CANCELLATION OF PUBLIC HEARING ON MARCH 1, 2012

Nevada Division of Environmental Protection
Bureau of Air Quality Planning

Pursuant to the public hearing provisions in Title 40 of the Code of Federal Regulations Part 51 section 102, the Nevada Division of Environmental Protection (NDEP) is cancelling the following public hearing because no request for a hearing was received:

March 1, 2012

10:00 a.m. to 12:00 p.m.

NDEP Conference Center (Rm. 5001), 5th Floor

9001 South Stewart Street

Carson City, Nevada

The NDEP's draft Updated Limited Maintenance Plan for carbon monoxide and related materials are available on the NDEP website at <http://ndep.nv.gov/admin/public.htm>, click on "Air Quality Planning." Persons may also check on the status of Nevada's SIP revision by telephone at (775) 687-9356.

WRITTEN COMMENTS AND NEVADA'S RRESPONSE

One written comment was received:



**TAHOE
REGIONAL
PLANNING
AGENCY**

Mail
PO Box 5310
Stateline, NV 89449-5310

Location
128 Market Street
Stateline, NV 89449

Contact
Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

February 21, 2012

Ms. Adele Malone
Nevada Department of Environmental Protection
901 S. Stewart Street, Suite 4001
Carson City, Nevada 89701

Subject: DRAFT 2012 Revision to the Nevada State Implementation Plan (SIP) for Carbon Monoxide

Dear ~~Ms. Malone;~~ *Adele*

The purpose of this letter is to provide the Tahoe Regional Planning Agency's (TRPA) input on the Draft 2012 Revision to the Nevada State Implementation Plan (SIP) for Carbon Monoxide. We appreciate being provided an opportunity to provide feedback. In order to provide easy to follow input with the Draft SIP, we have provided our comments consistent with the numerical headings provided in the Draft SIP.

NDEP Page 3; 2.1 Monitoring Data; Last Paragraph

"It is evident from Table 1 that the eight-hour CO NAAQS has not been violated in the Basin in the last 33 years. The Basin was designated nonattainment for CO on November 25, 1977, based on 1976 monitoring data. By 1979, the Basin was attaining the standard. From 1979 on, there have been no exceedances of the CO NAAQS."

TRPA Comment

It is important to note that while the Stateline monitoring data concludes that the eight-hour National Ambient Air Quality Standard (NAAQS) of 9 ppm has not been exceeded in the last 33 years, the TRPA eight-hour CO standard of 6 ppm has seen violations as recent as 2002. While these violations are considered exceptional events, primarily due to temporary activities (July 4 activities and the Gondola Fire), the development of the TRPA eight-hour 6.00 ppm was adopted because carbon monoxide is believed to pose a greater health risk at high altitudes than at sea level, especially for visitors not acclimated to the increased elevation (**Study Report for the Establishment of Environmental Threshold Carrying Capacities, TRPA 1982**).

NDEP Page 9; Monitoring Commitment; First Paragraph

"The NDEP plans to discontinue CO monitoring at Stateline (located at Harvey's Resort and Hotel on Hwy 50) by June 30, 2012. The NDEP concludes that 33 years of clean data, all of it under 80 percent of the NAAQS and most recently at 34 percent, with on-going downward trends is sufficient evidence of continued attainment through 2024 and, together with the discussion and

imagine. plan. achieve.

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commitments in Section 3, Verification of Continued Attainment, satisfies 40 CFR 58.14 requirements for discontinuance. USEPA maintains that, "... regional office experience has demonstrated that CO monitors can be discontinued even if referenced in maintenance plans and SIPs." (EPA OAQPS power point presentation, "OAQPS Update on Emerging Monitoring Issues," by Chet Wayland and Lewis Weinstock, for WESTAR Council call, January 11, 2012) Further, the State/EPA Workgroup on Work Prioritization notes that, "EPA recognizes that technical, policy, and political considerations can impact the ability to discontinue monitors. Given this reality, EPA and states need to work together to weigh resources in light of revised monitoring requirements, and make appropriate judgments to divest of monitoring assets viewed as low-value." (State/EPA Workgroup on Work Prioritization paper, "Top 10 opportunities for greater efficiency or reduced burden without compromising public health," item 1.c, December 23, 2011)"

TRPA Comment

It is equally important to note that the TRPA must satisfy the limited maintenance conformity requirements for California. The CO monitoring that is currently maintained by NDEP has also been utilized to determine the ambient carbon monoxide concentrations for California. While the limited maintenance conformity plan ends in Nevada on February 13, 2014, the limited maintenance conformity plan in California does not end until 2018. It would appear that additional coordination needs to take place between TRPA, EPA, NDEP and the California Air Resources Board (CARB) prior to discontinuance of the monitoring site operation.

NDEP Page 10; Indicators; First Paragraph

Local CO levels and national trends for CO concentrations confirm that CO levels in the Basin will remain significantly below federal health standards into the future. On an annual basis, the NDEP provides CO point source emissions data to the USEPA as part of the National Emission Inventory (NEI) process. Additionally, every third year the NDEP provides emission model inputs that allow the USEPA to calculate a comprehensive emissions inventory, including CO emissions from on-road and non-road mobile sources. These inventories will indicate whether levels of CO in Nevada generally are remaining significantly below the NAAQS. The NDEP will also track available monitored CO levels from nearby monitors, including Reno, NV and Sacramento, CA. If ambient CO levels rise significantly at those sites, the NDEP will conduct field studies using a portable CO monitor to determine whether CO concentrations in the Basin are at or above the 85th percentile of the NAAQS. If concentrations reach 85 percent of the NAAQS, the NDEP will evaluate whether it should re-establish a CO monitoring site and resume analyzing and reporting those data, and commit to developing a contingency program.

TRPA Comment

In order for TRPA to satisfy our limited maintenance conformity requirements for California and to maintain a transition from our existing carbon monoxide threshold monitoring commitments, we would like to recommend that EPA, NDEP and CARB investigate the possibility of maintaining a portable monitor at the existing NDEP monitoring location until the spring of 2018. Based on our

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wintertime traffic volumes, we would recommend a limited monthly monitoring program during the month of February to coincide with previous episodes of high traffic volumes and carbon monoxide concentrations.

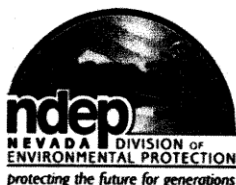
Thank you for the opportunity to comment on the Draft 2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide. We look forward to discussing our comments with you and resolving these important issues.

Sincerely,



Keith Norberg
Transportation Planner

The NDEP's response:



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

March 19, 2012

Keith Norberg, Transportation Planner
Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, Nevada 89449-5310

Dear Mr. Norberg:

Thank you for your letter of February 21, 2012 providing comments on the Nevada Division of Environmental Protection's (NDEP) draft *2012 Revision to the Nevada State Implementation Plan for Carbon Monoxide* (CO Plan Revision). The CO Plan Revision addresses the federal requirement to provide a plan for maintaining the federal 8-hour ambient air quality standard of 9 ppm for carbon monoxide (CO) on the Nevada side of the Lake Tahoe Basin. The plan covers the 2nd 10-year period, following approval of the initial 10-year maintenance plan and the area's redesignation to attainment in 2004. We understand that your concerns are with the Tahoe Regional Planning Agency's (TRPA) continued ability to determine compliance with the local 6 ppm standard for CO in the Lake Tahoe Basin and the federal maintenance plan requirements for the California side of the Basin.

Both TRPA and the California Air Resources Board (CARB) have relied on the NDEP's CO monitor at Stateline to determine compliance with local and federal CO standards. The local 6 ppm standard was most recently exceeded in 2002 and 2003. As you note in your comment letter and the NDEP asserts in the CO Plan Revision, these exceedances were likely caused by exceptional events. Prior to 2002, the last exceedance of the 6 ppm standard was in 1986. Basically, the 6 ppm standard has not been exceeded for 25 years. The NDEP therefore concludes, even with respect to the local CO standard, it is not a wise use of the NDEP's limited resources to continue monitoring for CO at Stateline.

You recommend that EPA, NDEP and CARB investigate the possibility of maintaining a portable monitor at the existing NDEP monitoring station until the spring of 2018, when California's 2nd 10-year CO maintenance plan expires. You suggest monitoring during the month of February each year through 2018. In the review draft of the CO Plan Revision, the NDEP said it would use a portable CO monitor if monitoring was indicated. However, further research suggests that a portable monitor would not provide reliable data. We have, therefore, amended the CO Plan Revision to reactivate the Stateline monitor for any study of CO concentrations triggered by the plan. The NDEP does not plan to resume monitoring at that site unless the surrogate monitoring method described in the final CO Plan Revision triggers the need for a CO monitoring study.

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The NDEP is aware that CARB uses the data from the NDEP's Stateline monitor to demonstrate compliance with the federal CO standard for the California side of the Basin. Having recognized that, the NDEP contacted CARB during the initial drafting of our CO Plan Revision to discuss the impact of discontinuing that monitor on their CO maintenance plan. CARB did not express an objection. Although the NDEP plans to stop operating the Stateline monitor, we are willing to turn the site over to TRPA or CARB to operate, if there is an interest. We also commit to notifying TRPA should we become aware of any evidence of increasing CO levels in the Basin.

If you have any further comments or questions, feel free to contact me at 775.687.9356.

Sincerely,



Adele K. Malone, Supervisor
Planning and Monitoring Branch
Bureau of Air Quality Planning

cc: Rob Bamford, Chief, Bureau of Air Quality Planning
Nick Haven, Program Coordinator, Transportation Planning, TRPA
Karen Fink, Senior Planner, Transportation Planning, TRPA
Shane Romsos, Acting Measurement Manager, Measurement Branch, TRPA
Gayle Sweiger, Planning and Technical Support Division, AQ Data Branch, CARB
Marcella Nystrom, Planning and Technical Support Division, CARB
Elfego Felix, Air Quality Analysis Office, USEPA Region 9