

US EPA ARCHIVE DOCUMENT

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Date: 08/04/2004 03:40 PM  
Subject: Supplemental information to Clark County's 11-factor analysis.

As DAQEM was finalizing its submittal of its 11-factor analysis for the nonattainment boundary in Clark County, John Kelly, EPA Region IX, called in and asked that Clark County's 11-factor analysis take into consideration future growth issues such as:

Ivanpah Hydrographic Area (164A, 164B 165, 166)

- Expansion projects along I-15 corridor
- Ivanpah Energy Power Plant (ATC issued by DAQEM)
- Future Airport in Ivanpah Valley (Year-2015) (Proposed, High Priority)

Apex Hydrographic Area (216, 217)

- Duke Energy Power Plant (ATC issued by DAQEM)
- Cal Pine Power Plant (straddles Apex and Moapa Hydrographic Areas)
- Harry Allen Power Plant (addition of a turbine) application in-house.
- Chemical Lime Company (major modification) (proposed)

Moapa Hydrographic Area (218)

- Cal Pine Power Plant (ATC issued by EPA Region IX)
- Ash Grove Cement Company (proposed)

El Dorado Hydrographic Area (213)

- Copper Mountain Power Plant (ATC issued by DAQEM)

Each of these new or modifying facilities and activities will result in additional NO<sub>x</sub> and VOC emissions in the hydrographic areas in which they are located. These sources were not discussed within the section on "Expected Growth" in the submitted report entitled Nevada Air Quality Designations Boundary Recommendations for the 8-Hour Ozone NAAQS for Clark County, Nevada. John asked that these be documented separately, if necessary, so that EPA can consider them, and ask questions as it considers the submittal from the State of Nevada.

The impact of these and other existing sources on Hydrographic Area 212 become significant due to transport resulting from prominent wind patterns within the areas surrounding 212. Typically, the upper level winds will travel from southwest to northeast, west to east, or from northwest to southeast. However, surface winds do travel from northeast to southwest and from east to west on

occasion. This east to west wind has occurred on at least two occasions when exceedances occurred in the Las Vegas and Apex valleys. This phenomenon lends support to the assumption that emissions generated in Apex and Moapa valleys may have an impact on the nonattainment status for the Las Vegas Valley. DAQEM records indicate that studies have been done years ago regarding the winds around the Las Vegas Valley. We are searching for copies of these old reports and will make them available upon request. Internet searches of the meteorological data that is available from various sites around Clark County support the conclusions that emissions from hydrographic areas 216 and 218 can be transported to hydrographic area 212 on occasion. These can be made available upon request.

If there is anything DAQEM can do to assist in the analysis of its submittal, please contact me, Richard Beckstead at (702) 455-1669, and we will provide whatever information that is available.

Sincerely,

Richard Beckstead  
DAQEM Permitting Manager  
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