

NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
David Emme, Administrator

June 24, 2016

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

**RE: Modeling Protocol for North Valmy Generating Station, Nevada, for the 2015 SO<sub>2</sub> Data Requirements Rule**

Dear Ms. Strauss:

On August 21, 2015 the US Environmental Protection Agency (EPA) promulgated the *Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS)* [80 FR 51052]. 40 CFR Part 51, Subpart BB contains the Data Requirements for Characterizing Air Quality for the Primary SO<sub>2</sub> NAAQS. According to 40 CFR Part 51, Subpart BB § 51.1203(b), "For each source area subject to requirements for air quality characterization, the air agency shall notify the EPA by July 1, 2016, whether it has chosen to characterize peak 1-hour SO<sub>2</sub> concentrations in such area through ambient air quality monitoring; characterize peak 1-hour SO<sub>2</sub> concentrations in such area through air quality modeling techniques; or provide federally enforceable emission limitations by January 13, 2017 that limit emissions of applicable sources to less than 2,000 tpy, in accordance with paragraph (e) of this section, or provide documentation that the applicable source has permanently shut down."

Also, according to § 51.1203(d) *Modeling*. "For each area identified in the notification submitted pursuant to paragraph (b) of this section as an area for which SO<sub>2</sub> concentrations will be characterized through air quality modeling, the air agency shall submit by July 1, 2016, a technical protocol for conducting such modeling to the Regional Administrator for review. The air agency shall consult with the appropriate EPA Regional Office in developing these modeling protocols."

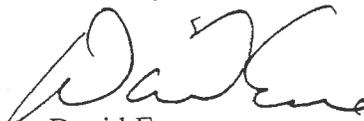
The Nevada Division of Environmental Protection (NDEP) identified one source in Nevada with SO<sub>2</sub> emissions greater than 2,000 tons, NV Energy's North Valmy Generating Station (Valmy) located in Humboldt County, Nevada. In a letter dated March 18, 2016, the EPA Region 9 Regional Administrator, Jared Blumenfeld, concurred with the list of sources provided by the NDEP. Pursuant to § 51.1203(b), the NDEP hereby notifies EPA that it will characterize SO<sub>2</sub> concentrations for Valmy through modeling. Further, pursuant to § 51.1203(d), the NDEP is submitting the attached modeling protocol for Valmy.

On behalf of Governor Sandoval, as his appointed designee, this letter transmits to you Nevada's choice of air quality characterization and the modeling protocol for Valmy. This fulfills the

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requirements under the Data Requirements Rule under 40 C.F.R. Part 51, Subpart BB. 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/o enclosure:

Sheila Anderson, Management Analyst I, Office of the Governor  
Amy Zimpfer, Associate Director, Air Division, USEPA Region IX (AIR-1)  
Doris Lo, Acting Chief, Planning Office, USEPA Region IX (AIR-2)  
Scott Bohning, USEPA Region IX, (AIR-7)  
Vijay Limaye, USEPA Region IX (AIR-2)  
Gwen Yoshimura, USEPA Region IX (AIR-7)

ec w/o enclosure:

Danilo Dragoni, Chief, Bureau of Air Quality Program  
Leo Drozdoff, Director, Nevada Department of Conservation & Natural Resources

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