



March 23, 2017

Administrator Scott Pruitt  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460  
(Submitted electronically to the docket at [www.regulations.gov](http://www.regulations.gov))

**Attention: Docket ID No. EPA-HQ-OAR-2016-0751; Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard**

Dear Administrator Pruitt:

Pursuant to the solicitation for public comment published January 6, 2017 in the *Federal Register*, the State of Nevada, through the Department of Conservation and Natural Resources, Division of Environmental Protection (NDEP), submits the following comments to the United States Environmental Protection Agency (USEPA) regarding the notice of data availability: Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard.

The NDEP appreciates the opportunity to comment on USEPA's preliminary interstate transport modeling for the 2015 ozone standard. The NDEP supports USEPA's efforts to provide additional technical assistance to the states in their development of State Implementation Plans to address the requirements of Clean Air Act section 110(a)(2)(D)(i)(I) and values USEPA's willingness to consult with states on this important matter.

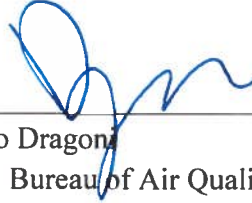
The NDEP joins in the comments submitted by the Association of Air Pollution Control Agencies (AAPCA)<sup>1</sup> regarding the *Preliminary Interstate Ozone Transport Modeling Data for the 2015 Ozone National Ambient Air Quality Standard*. In particular, the NDEP is concerned about the application of the 1 percent threshold, established in CSAPR<sup>2</sup>, for interstate transport obligations in the western United States. The NDEP encourages the consideration by the USEPA of alternative approaches to define the level of significance for interstate transport, particularly where total interstate contributions are small compared to contributions from intrastate sources. Thank you for your consideration of our comments on this guidance document.

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<sup>1</sup> Letter to Docket ID No. EPA-HQ-2016-0751 from the Association of Air Pollution Control Agencies, dated March 13, 2017.

<sup>2</sup> 76 FR 48211, 48236.

Sincerely,



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Danilo Dragoni  
Chief, Bureau of Air Quality Planning

cc: Elizabeth Adams, Acting Director of Air Division, USEPA Region 9  
Colleen McKaughan, Associate Director of Air Division, USEPA Region 9  
ec: Bradley Crowell, Director, Nevada Department of Conservation and Natural Resources  
Greg Lovato, Administrator, Nevada Division of Environmental Protection  
Jeff Kinder, Deputy Administrator, Nevada Division of Environmental Protection