

wide source category. Addendum at 42011. As discussed in section III of this preamble, we have established a four-step process for evaluating BACM in serious area PM-10 plans.

Steps 1 and 2: Determination of Significant Sources

The first step in the BACM analysis is to develop a detailed emissions inventory of PM-10 sources and source categories that can be used in modeling to determine their impact on ambient air quality. Addendum at 42012. The second step is to use this inventory in air quality modeling to evaluate the impact on PM-10 concentrations over the standards of the various sources and source categories to determine which are significant.

The development of the detailed emissions inventory is discussed in the preceding section and in the TSD. We propose to find that the baseline emissions inventory contains a sufficient level of detail to enable appropriate evaluation of the Plan's control measures for BACM purposes. The determination of source significance is based primarily on the J.D. Smith annual inventory and the 24-hour micro-inventories at the five representative sites, supplemented by reviews of the 1998 valley-wide 24-hour emissions inventory, the 1998 valley-wide annual emissions inventory, and Chemical Mass Balance modeling. Clark County Plan, Chapter 4, pg. 4-1.

From these evaluations, the Clark County Plan identifies the following sources as significant with respect to the annual standard:

1. Disturbed vacant land/unpaved parking lots
2. Construction (including highway construction)
3. Paved roads
4. Unpaved roads

The same source categories are deemed significant for the 24-hour standard, with the additional category of:

5. Race tracks

Clark County determined that the following source categories are not significant for both standards:

1. Stationary point sources (sand and gravel operations, utilities—natural gas, asphalt concrete manufacture, industrial processes, other)
2. Some stationary area sources (small point sources, fuel combustion sources, residential wood combustion, open burning, farming operations)
3. Nonroad mobile sources (airport support equipment, commercial equipment, construction and mining equipment, lawn and garden

equipment, railroad equipment, airport emissions)

4. Onroad mobile vehicle exhaust and other emissions
5. Secondary aerosol particulate

Emissions from the proposed *de minimis* categories are a small percentage (3% collectively) of the total 1998 BLM Disposal Area annual and 24-hour PM-10 emissions inventories. The minimal contribution of the proposed *de minimis* source categories to the inventory supports that, both individually and collectively, they have a minor impact on elevated annual and 24-hour PM-10 levels in the Clark County nonattainment area.

For the 24-hour standard, the Clark County Plan demonstrates that its selection of significant source categories is appropriate by showing that controls on the *de minimis* source categories would not result in attainment of the 24-hour standard by 2001. See Clark County Plan, Chapter 7, section 7.4.

We propose to find that the Clark County Plan has not excluded any source categories that should be considered significant from its list of significant source categories. The Plan presents acceptable modeling to evaluate the impact of various PM-10 sources and source categories on PM-10 levels and to derive a comprehensive list of significant source categories.

Step 3: Identification of Potential BACM

In preparing the list of candidate BACM, Clark County reviewed our guidance documents on BACM, other EPA documents on PM-10 control, as well as PM-10 plans from other serious PM-10 areas in the United States. Clark County also evaluated controls proposed during public comment.

The Clark County plan appropriately screened the list of candidate BACM to eliminate measures that did not apply to significant source categories in the area, or were technologically infeasible for the area because they would not reduce PM-10 emissions. The Clark County Plan also provides cost-effectiveness estimates for each of the candidate BACM.

We propose to find that the Clark County Plan identified and evaluated potential BACM for the Las Vegas area consistent with our guidance. As we will discuss below in our evaluations of the implementation of BACM for each significant source category, we do not believe that the Clark County plan left out any candidate BACM.

Step 4: Implementation of RACM¹¹ and BACM and Inclusion of MSM for Each Significant Source Category

In the following sections, we review the results of the Clark County Plan's BACM analysis and adopted measures. The same control measures apply to BACM determinations for both the annual and 24-hour PM-10 standards. We also present our evaluation of the Plan's provisions for including MSM alongside our evaluation of BACM implementation for each significant source category.

Clark County adopted sections 90 through 94 and section 0 on November 16, 2000. Sections 90 through 93 were subsequently revised by the DAQM on November 20, 2001. Clark County submitted these revised rules to EPA on October 24, 2002 for our action in place of the sections 90 through 93 adopted on November 16, 2000. These rules address the significant sources identified in the Plan, along with SIP commitments for unpaved roads and unpaved road shoulders contained in Chapter 4 of the Plan.

Clark County has also committed to increase its staffing levels to enhance compliance and enforcement of these rules to assure that the emission reductions necessary for expeditious attainment are achieved. This commitment is an important component of our proposed finding that the Clark County Plan provides for implementation of BACM and inclusion of MSM.

We also have evaluated the rules for enforceability and consistency with applicable CAA requirements for SIP revisions in section 110 and Part D and EPA rulemaking policy.

a. Disturbed Vacant Land

This category includes windblown fugitive dust emissions from disturbed surfaces of vacant land. On vacant land, fugitive dust emissions are caused by virtually any activity which disturbs an otherwise naturally stable parcel of land, including earth-moving activities, material dumping, weed abatement, and vehicle traffic. Wind erosion from disturbed vacant land accounts for 45 percent of total PM-10 emissions in the 1998 24-hour BLM Disposal Area inventory and 39 percent of total PM-10 emissions in the 1998 annual BLM Disposal Area valley-wide inventory,

¹¹ Because the RACM demonstration is subsumed in the BACM demonstration, a separate analysis to determine if the measures represent a RACM level of control is not necessary. Our proposed approval of the Clark County Plan's provisions relating to the implementation of BACM is also a finding that the plan provides for the implementation of RACM.