

implementation BACM and for the inclusion of MSM for construction sites. We also propose SIP approval of section 94 and the section 94 Handbook and referenced documents per CAA section 110 and part D.

d. Paved Road Dust

Paved road dust is fugitive dust that is deposited on a paved roadway and then re-entrained into the air by the action of tires grinding on the roadway. Dust can be deposited on the roadway from being blown onto the road from disturbed areas, tracked onto the road from unpaved shoulders, unpaved roads, or other unpaved access points, stirred up from unpaved shoulders by wind currents created from traffic movement, spilled onto the road by haul trucks, and carried onto the road by water runoff or erosion. Paved road dust constitutes 26 percent of the 1998 valley-wide annual BLM Disposal Area emissions, thus is the second largest source of valley-wide PM-10 in the Las Vegas area. Paved road dust accounts for 13 percent of the overall 24-hour BLM Disposal Area 1998 inventory.

The suggested measures for controlling emissions from paved road dust fall into two categories: Preventing deposition of material onto a roadway, and cleaning material off the roadway.²⁸ The Clark County Plan includes ten potential BACM for paved road dust that fall under one of these two categories. We believe this list is complete and propose to find that the Clark County Plan evaluates a comprehensive set of potential controls for paved road dust including the potential MSM from other States.

Clark County adopted requirements for paved road shoulders and PM-10 efficient street sweeping requirements in section 93 "Fugitive Dust from Paved Roads and Street Sweeping Equipment". Clark County adopted SIP commitments to stabilize existing unpaved road shoulders and require use of vacuum crack seal equipment. See Clark County Plan, Chapter 4, sections 4.8.3.2 and 4.8.2.9.²⁹ Measures to prevent construction site trackout onto paved roads from truck tires and material

transport are included in section 94 and the section 94 Handbook (construction activity regulations). For other measures³⁰, Clark County provided documentation of ongoing programs in place.³¹

The paved road measures relied upon for emissions reductions towards demonstrating attainment include stabilizing unpaved road shoulders, preventing trackout from construction sites, and reducing deposition from other fugitive dust sources subject to control per sections 90 through 94. The remaining measures are either already factored into the baseline or are not credited with emissions reductions towards the attainment demonstration.³²

Section 93 requires owners/operators using street sweeping equipment or services on paved roads or parking lots to acquire or contract to acquire only certified PM-10 efficient street sweeping equipment³³ after January 1, 2001. We note this requirement applies to both private operators and government agencies.

For new or modified road shoulders, section 93 requires four feet of paved or stabilized shoulder on each side of the paved travel section or construction of curbing adjacent to the paved travel lane.³⁴ Medians must also be stabilized.

For existing unpaved road shoulders, section 93 requires stabilization within 365 days following initial discovery that the road fails to meet the stabilization standards and other requirements that apply to new/modified paved road shoulders. The stringency of this provision is necessarily enhanced by the SIP commitment in the Plan which lays forth the program and definitive dates by which all unstabilized shoulders will be identified and stabilized by public agencies in the Valley. Clark County indicates that shoulder improvements will be prioritized by each entity for their respective jurisdictions based upon emissions estimates. To

implement the program, Plans will be completed by February 15, 2002, and at a minimum, funds will be obligated to improve 33 miles of paved road shoulders by the end of 2003, with all shoulders to be stabilized by the end of 2006. Annual updates on the progress of stabilizing shoulders will be submitted to Clark County and EPA. In a June 28, 2002 letter, the DAQM indicates that the respective public entities have submitted initial plans for stabilizing shoulders and initiated programs to begin stabilization.

Section 93, paved road requirements, became effective on January 1, 2001. The SIP commitment by governmental entities to stabilize 33 miles of unpaved shoulders by the end of 2003 and all shoulders by the end of 2006 allows time for public works agencies to complete an inventory of the unpaved shoulders in their respective jurisdictions and adopt schedules under capital improvement programs to stabilize shoulders each year using Congestion Management Air Quality (CMAQ) funds. Other measures have ongoing implementation schedules because they are part of an on-going capital improvement program, e.g., storm water drainage projects. Therefore, we propose to find that the Clark County Plan provides for the implementation of paved road measures as expeditiously as practicable, consistent with our proposed MSM policy.

For the MSM analysis, Clark County demonstrated that the section 93 requirements and SIP commitments contained in the Plan are of equivalent or greater stringency than those adopted or in practice in other areas.

We, therefore, propose to find that the Clark County Plan provides for the implementation of BACM and for the inclusion of MSM for paved road dust.

e. Unpaved Roads

This category includes re-entrained dust from vehicle travel on unpaved roads and windblown emissions from unpaved roads. There are three categories of unpaved roads in the Clark County nonattainment area: Publicly-owned/maintained roads, privately-owned roads, and unpaved haul/access roads associated with construction sites or industrial facilities. We have addressed the latter category in the discussion of construction site measures (section IV.D.3.c) of this document.

There are three ways to control fugitive dust emissions from unpaved roads: surface treatment to reduce dust from unpaved roads and alleys, traffic reduction/speed control plans for unpaved roads, and prohibition of

³⁰ Prevention of storm water drainage deposits, cleanup of material spills and erosion-caused deposits, and routine sweeping of paved roads.

³¹ See Clark County Plan, Appendix J and Chapter 4, pg. 4-69.

³² For example, a large portion of the publicly-owned street sweeping fleet already consisted of PM-10 efficient street sweepers in 1998 and routine sweeping programs were already in place.

³³ This refers to a street sweeper which has been certified by the South Coast Air Quality Management District (SCAQMD) to comply with the performance standards in SCAQMD's Rule 1186 according to test methods specified in Rule 1186.

³⁴ Clark County has made a SIP commitment to strengthen this provision to provide for eight feet of stabilized shoulder adjacent to the paved travel section on roads with 3,000 vehicles per day or more. The new SIP commitment date of March 31, 2003 applies per Clark County's SIP amendment.

²⁸ Reductions in vehicle miles traveled and vehicle trips are also candidate transportation control measures (TCMs) that could have positive impacts on reducing paved road dust. However, these measures are more appropriate for areas addressing significant on-road mobile source emissions and would not impact paved road dust on the same magnitude as measures directed towards preventing or removing deposition. TCMs are separately addressed and included in Clark County's Carbon Monoxide Plan, adopted on August 1, 2000.

²⁹ Clark County submitted a SIP amendment that establishes a revised deadline of March 31, 2003 for the section 93 and other rule revisions.