



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

December 29, 2011

Department of the Army, Hawthorne Army Depot
Attn: William C. Johnson
Lieutenant Colonel, U.S. Army, Commanding
1 South Maine Avenue
Hawthorne, Nevada 89415-5000

Re: Significant Revision for HWAD Class I Air Permit #AP9711-0863
Renewal for HWAD Class I Air Permit #AP9711-0863
Revision for HWAD RF-9 Class I OPTC #AP9711-1445
Conversion for HWAD RF-9 OPTC into HWAD Class I Air Permit #AP9711-0863
FIN A0022

Dear Lt. Colonel Johnson:

The renewal application for Class I AP9711-0863.01, significant revision application for Class I AP9711-0863.01, revision application for RF-9 Class I Operating Permit to Construct AP9711-1445, and the application for RF-9 Operating Permit to Construct AP9711-1445 conversion into the HWAD Class I AP9711-0863.01 have been reviewed by the Nevada Division of Environmental Protection, Bureau of Air Pollution Control (NBAPC) under legal authority from Nevada Revised Statutes 445B.100 through 445B.640 and pursuant to regulations in Nevada Administrative Code 445B.001 through 445B.3689. Based on NBAPC's review of the four applications and recommendation, I am hereby issuing the renewed and revised Class I Air Quality Operating Permit AP9711-0863.02, with appropriate restrictions. Class I Air Quality Operating Permit No. AP9711-0863.02 must be posted conspicuously at or near the source.

Pursuant to NAC 445B.3395, a notice of proposed action was published in the Mineral County Independent News on November 10 and a copy of the proposed renewed/revised draft permit and director's review were made public at the Mineral County Library to initiate the 30 day public review period. Public review ended December 16, 2011. No public comments were received.

Pursuant to NAC 445B.340, a copy of the applications and draft copy of the renewed/revised permit were made available to the Environmental Protection Agency on November 7, 2011 for the required 45 day review process. Certified mail indicated EPA received the draft permit and support documents on November 10, 2011. The review period ended December 24, 2011. EPA Region IX did not comment.

Enclosed is your copy of the renewed/revised Class I Air Quality Operating Permit AP9711-0863.02. Operating Permit AP9711-0863.02 includes the following changes:

- RF-9 included in the HWAD Main Base operating permit.
- RF-9 operating hours increased to 4,660 hours per year.
- PODS cooling tower added to the emissions inventory as an insignificant source.
- RF-9 and PODS emissions reflect compliance with April 2008 MACT standards.
- Removal of two boilers no longer in service (S2.005 & S2.007).
- Removal of a radial stacker damaged beyond repair and removed from site (PF1.016).
- Removal of an emergency generator (Cummins Generator, Serial #J920487824, permit IDEG-004) and replacement with a similar Katolight generator.
- Removal of a surface coating booth (S2.042), removed from facility.
- Revision of lead emission limits for Hot Gas (S2.044).
- Inclusion of a new surface coating booth operating 8760 hours per year.



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- Inclusion of an abrasive blaster (Pangborn Blast Booth, Model LK-4, Serial 6LK4-711).
- Inclusion of a used oil heater as an insignificant unit, less than 4 MMBtu.
- The large boilers (units S2.001/002/003/004/011/014) are restricted to a 1,500,000 gal/year fuel cap.
- Permit three gasoline dispensing storage tanks, restricted to a 10,000 gal/month.
- Old Bomb is restricted to 1,000 lb/open burn/pan, and 20,000 lb/day total, and 3,900,000 lb/calendar year total.
- Facility-wide HAPs will not exceed 10 tons/year of any one HAP or 25 tons/year total HAPs.
- Specifically, the following caps are in place; facility-wide total HAPs cap is 24.9 ton/year and the facility-wide HCl cap is 9.9 ton/yr.
- Old Bomb will not exceed 9.07 tons/year of any individual HAP or 18.07 tons/year total HAPs (these caps fall under the facility-wide cap).
- Removal of lead emission limits and lead emission testing requirement for the large boilers.
- Removal of Schedule of Compliance for Chemical Accident Prevention Provisions – RMP submitted July 2009.
- Removal of Schedule of Compliance for “Plan for Reduction of Emissions” – Plan submitted April 2011.
- The revised total facility-wide (includes insignificant activities) particulate matter (PM) emissions are calculated at 81.58 tons/year (tpy), PM₁₀ (particulate matter less than 10 microns in diameter) emissions are calculated at 78.08 tpy, NOx emissions are calculated at 242.72 tpy, SO₂ emissions are calculated at 83.45 tpy, CO emissions are calculated at 23.55 tpy, and VOC emissions are calculated at 26.04 tpy.

In accordance with Nevada Revised Statute 445B.340, you may appeal the department's action of issuance of this renewed/revised operating permit within 10 days after you receive the permit. Appeals may be filed with the State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, Nevada, 89701-5249, telephone (775) 687-9308.

Please review your renewed/revised operating permit carefully to understand all conditions, restrictions, monitoring and recordkeeping requirements. If you have any questions, please call Randy Phillips, of my staff, at (775) 687-9362 or me at (775) 687-9475.

Sincerely,



Jeffrey Kinder, P.E.
Supervisor, Permitting Branch
Bureau of Air Pollution Control

Certified Mail No. 7008-1140-0004-4030-1984

Enclosures: Renewed/Revised Class I Air Permit AP9711-0863.02

cc (w/enclosures): Gerardo Rios, Chief (A-5-1), New Source Section, Air & Toxics Division, U.S. EPA, Region IX,
75 Hawthorne St., San Francisco, CA 94105

E-Copy: Omer Shalev, Air & Toxics Division, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105