

STATE OF NEVADA  
 DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
 DIVISION OF ENVIRONMENTAL PROTECTION-BUREAU OF AIR POLLUTION CONTROL

**Director's Review and Preliminary Determination of Permit Issuance  
 for**

**Department of the Army – Hawthorne Army Depot  
 1 South Maine Avenue, Hawthorne, Nevada 89415-5000**

**November 7, 2011**

Hawthorne Army Depot (HWAD) submitted applications for renewal of the HWAD Main Base Title V Operating Permit, significant revision of the HWAD Main Base Title V Operating Permit, revision of the HWAD RF-9 Operating Permit to Construct, and conversion of the HWAD RF-9 Operating Permit to Construct into the HWAD Main Base Title V Operating Permit. HWAD is located in Mineral County, Nevada, approximately 1 mile north of Hawthorne, Nevada, U.S. Hwy 95 North. HWAD currently operates under a Title V Operating Permit (Main Base, AP9711-0863.01). HWAD currently holds a Title V Operating Permit (AP9711-0863.01), an Operating Permit to Construct for BEDS (AP9711-1489), an Operating Permit to Construct for RF-9 (AP9711-1445), an Operating Permit to Construct for COMP A5 (AP9711-2757), and a Class II Air Quality Operating Permit for New Bomb (AP9711-1134.02).

HWAD proposes to renew the HWAD Main Base Title V Operating Permit; add RF-9 to the HWAD Main Base operating permit; increase RF-9 operating hours to 4,660 hours per year; add a PODS cooling tower as an insignificant source; remove two boilers no longer in service; remove a radial stacker; remove an emergency generator and replace with a similar generator; remove a surface coating booth; revise the lead emission limits for Hot Gas (System 27); add a new surface coating booth; add an abrasive blaster; add a used oil heater; restrict boilers (Systems 1, 2, 3, 4, 7, and 8) to a 1,500,000 gal/year diesel fuel cap; add three gasoline dispensing storage tanks that are restricted to a 10,000 gal/month cap; restrict Old Bomb to 1,000 lb/open burn/pan, 20,000 lb/day total, and 3,900,000 lb/calendar year total; limit the facility-wide HAPs to not exceed 10 tons/year of any one HAP or 25 tons/year total HAPs; remove lead emission limits and lead emission testing requirement for boilers (Systems 1, 2, 3, 4, 7, and 8); remove Schedule of Compliance for Chemical Accident Prevention Provisions (RMP submitted July 2009 to Region 9 EPA); and remove Schedule of Compliance for "Plan for Reduction of Emissions" (Plan submitted to NBAPC April 2011). The total facility-wide particulate matter (PM) emissions are 81.6 tons/year (tpy), PM<sub>10</sub> (particulate matter less than 10 microns in diameter) emissions are 78.1 tpy, NO<sub>x</sub> emissions are 242.7 tpy, SO<sub>2</sub> emissions are 83.5 tpy, CO emissions are 23.6 tpy, and VOC emissions are 26.0 tpy.

The HWAD facility-wide potential-to-emit (PTE) is shown in the table below:

As proposed, HWAD will continue to be a Class I source. The potential-to-emit (PTE) of each regulated air pollutant is less than the 250 ton per year PSD threshold for major source designation. HWAD will be subject to NSPS 40 CFR Part 60 Subpart Dc and NESHAP 40 CFR Part 63 Subparts EEE, ZZZZ, CCCCCC, JJJJJJ.	HWAD Facility-Wide Potential to Emit		
	Pollutant		Tons/Year
	PM	Particulate Matter	81.6
	PM <sub>10</sub>	Particulate matter <10 microns in diameter	78.1
	NO <sub>x</sub>	Oxides of Nitrogen	242.7
	CO	Carbon monoxide	23.6
	VOC	Volatile Organic Compounds	26.0
	SO <sub>2</sub>	Sulfur Dioxide	83.5
	Pb	Lead	9.0
	HAPs	Combined Hazardous Air Pollutants	24.9

The project is located in Air Quality Hydrographic Area (HA) 110C – Walker Lake Valley. HA 110C is currently unclassified for PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub>, O<sub>3</sub>, and lead criteria pollutants, which have an ambient air quality standard. The air quality analyses demonstrate that the emissions from the renewed and revised permit will not cause or contribute to a violation of any applicable federal or state ambient air quality standards.

The NBAPC has reviewed the application and has made a preliminary determination to issue the renewed and revised Main Base Title V Operating Permit. HWAD must comply with all State and Federal air quality requirements and all conditions established within the proposed Main Base Title V Operating Permit.