

BUREAU OF AIR POLLUTION CONTROL

Facility ID No. A0022 Draft Permit No. AP9711-2757

CLASS I AIR QUALITY OPERATING PERMIT TO CONSTRUCT

Issued to: DEPARTMENT OF THE ARMY, HAWTHORNE ARMY DEPOT

Section V. Specific Operating Conditions

A. Emission Units S2.001 and S2.002 Location North 4,271.28 km, East 359.31 km, UTM (Zone 11, NAD 83)

System 1 – Cell #6 and Cell #7 Grenade Processing System

- S 2.001 Primary Comp A5 Collection System - Stage 1 (Cyclone #1) , Stage 2 (Baghouse #1), Stage 3 (HEPA Filter #1)
S 2.002 Secondary Comp A5 Collection System - Stage 1 (Cyclone #2) , Stage 2 (Baghouse #2), Stage 3 (HEPA Filter #2)

1. Air Pollution Equipment

Comp A5 is processed and removed from grenades at two milling/brushing stations (Cell #6 and Cell #7) and pneumatically collected through a series of collection pipes and separators in a Primary Comp A5 Collection System (S2.001) and a Secondary Comp A5 Collection System (S2.002).

S2.001 – Exhauster Stack #1

Outside Stack Height – 30 feet
Outside Stack Inside Diameter – 0.5 feet
Outside Stack Temperature – Ambient

S2.002 – Exhauster Stack #2

Outside Stack Height – 30 feet
Outside Stack Inside Diameter – 0.5 feet
Outside Stack Temperature – Ambient

2. Construction requirements NAC 445B.3365.3

a. Emission Limits NAC 445B.305

On and after the date of startup of S2.001 and S2.002, the Permittee will not discharge or cause the discharge into the atmosphere from Exhauster Stack #1 and Exhauster Stack #2 the following pollutants in excess of the following specified limits:

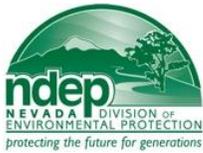
- (1) The discharge of PM (particulate matter) to the atmosphere will not exceed 0.129 pound per hour, nor more than 0.563 ton per year, each.
(2) The discharge of PM10 (particulate matter less than 10 microns in diameter) to the atmosphere will not exceed 0.129 pound per hour, nor more than 0.563 ton per year, each.
(3) The opacity from exhaust stacks of S2.001 and S2.002 each, will not equal or exceed 20 percent in accordance with NAC 445B.22017.

b. Operating Parameters NAC 445B.305

- (1) The maximum throughput rate for S2.001 will not exceed 2,880 grenades per hour, corresponding to 165.1 pounds of Comp A5 energetic material per hour.
(2) The maximum throughput rate for S2.002 will not exceed 2,880 grenades per hour, corresponding to 12.1 pounds of Comp A5 energetic material per hour.
(3) Hours S2.001 and S2.002 each, may operate 24 hours per day and 8,760 hours per calendar year.

c. Test Methods and Procedures NAC445B.305

- (1) Within 60 days after achieving the maximum production rate at which S2.001 and S2.002 will be operated, but no later than 180 days after initial startup of S2.001 and S2.002, Permittee shall demonstrate initial compliance with the opacity standards established in A.2.a(3) of this section in accordance with Reference Method 9 in Appendix A of 40 CFR Part 60.
(2) Permittee shall provide notification of the anticipated date for conducting the opacity observations required in A.2.c(1) of this section.
(3) Within 60 days after completing the opacity observations contained in A.2.c(1) of this section, Permittee shall furnish the director a written report of the results of the opacity observations required in A.2.c(1) of this section.



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Section V. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

3. Monitoring Requirements (NAC 445B.3365)

The Permittee, upon the issuance date of this Operating Permit to Construct will:

- a. Monitor the throughput rate of grenades and corresponding Comp A5 for **S2.001 and S2.002** on a daily basis.
- b. Monitor the hours of operation for **S2.001 and S2.002** on a daily basis.

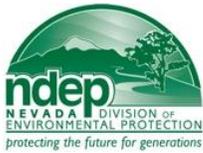
4. Recordkeeping Requirements (NAC 445B.3365)

The Permittee will maintain a contemporaneous log containing, at a minimum, the following recordkeeping:

- a. The calendar date of any required monitoring.
- b. The total daily throughput rate of grenades, for the corresponding date.
- c. The total daily throughput rate of Comp A5 in pounds, for the corresponding date.
- d. The total daily hours of operation, for the corresponding date.
- e. The corresponding average hourly throughput rate in grenades per hour and pounds of Comp A5 per hour. The average hourly throughput rates will be determined from the total daily throughput rates and the total daily hours of operation recorded in 4.b., 4.c and 4.d above.

5. Application for Revision to Existing Class I Air Quality Operating Permit (NAC 445B.3366)

The Permittee shall submit a complete Class I application for revision to Air Quality Operating Permit AP9711-0863.02 within 12 months after the notification date of initial startup for **S2.001 and S2.002**, covered in this Operating Permit to Construct.



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Section V. Specific Operating Conditions (continued)

B. Emission Units S2.003 and S2.004 Location North 4,271.28 km, East 359.32 km, UTM (Zone 11, NAD 83)

System 2 – Cell #4 and Cell #5 Grenade Processing System

- S 2.003 Primary Comp A5 Collection System - Stage 1 (Cyclone #3) , Stage 2 (Baghouse #3), Stage 3 (HEPA Filter #3)
S 2.004 Secondary Comp A5 Collection System - Stage 1 (Cyclone #4) , Stage 2 (Baghouse #4), Stage 3 (HEPA Filter #4)

1. Air Pollution Equipment

Comp A5 is processed and removed from grenades at two milling/brushing stations (Cell #4 and Cell #5) and pneumatically collected through a series of collection pipes and separators in a Primary Comp A5 Collection System (S2.003) and a Secondary Comp A5 Collection System (S2.004).

S2.003 – Exhauster Stack #3

Outside Stack Height – 30 feet
Outside Stack Inside Diameter – 0.5 feet
Outside Stack Temperature – Ambient

S2.004 – Exhauster Stack #4

Outside Stack Height – 30 feet
Outside Stack Inside Diameter – 0.5 feet
Outside Stack Temperature – Ambient

3. Construction requirements NAC 445B.3365.3

a. Emission Limits NAC 445B.305

On and after the date of startup of S2.003 and S2.004, the Permittee will not discharge or cause the discharge into the atmosphere from Exhauster Stack #3 and Exhauster Stack #4 the following pollutants in excess of the following specified limits:

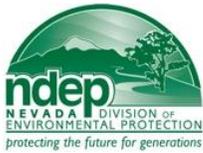
- (1) The discharge of PM (particulate matter) to the atmosphere will not exceed 0.129 pound per hour, nor more than 0.563 ton per year, each.
(2) The discharge of PM10 (particulate matter less than 10 microns in diameter) to the atmosphere will not exceed 0.129 pound per hour, nor more than 0.563 ton per year, each.
(3) The opacity from exhaust stacks of S2.003 and S2.004 each, will not equal or exceed 20 percent in accordance with NAC 445B.22017.

b. Operating Parameters NAC 445B.305

- (1) The maximum throughput rate for S2.003 will not exceed 2,880 grenades per hour, corresponding to 165.1 pounds of Comp A5 energetic material per hour.
(2) The maximum throughput rate for S2.004 will not exceed 2,880 grenades per hour, corresponding to 12.1 pounds of Comp A5 energetic material per hour.
(3) Hours S2.003 and S2.004 each, may operate 24 hours per day and 8,760 hours per calendar year.

c. Test Methods and Procedures NAC445B.305

- (4) Within 60 days after achieving the maximum production rate at which S2.003 and S2.004 will be operated, but no later than 180 days after initial startup of S2.003 and S2.004, Permittee shall demonstrate initial compliance with the opacity standards established in B.2.a(3) of this section in accordance with Reference Method 9 in Appendix A of 40 CFR Part 60.
(5) Permittee shall provide notification of the anticipated date for conducting the opacity observations required in B.2.c(1) of this section.
(6) Within 60 days after completing the opacity observations contained in B.2.c(1) of this section, Permittee shall furnish the director a written report of the results of the opacity observations required in B.2.c(1) of this section.



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Section V. Specific Operating Conditions (continued)

B. Emission Units S2.003 and S2.004 (continued)

3. Monitoring Requirements (NAC 445B.3365)

The Permittee, upon the issuance date of this Operating Permit to Construct will:

- a. Monitor the throughput rate of grenades and corresponding Comp A5 for **S2.003 and S2.004** on a daily basis.
- b. Monitor the hours of operation for **S2.003 and S2.004** on a daily basis.

4. Recordkeeping Requirements (NAC 445B.3365)

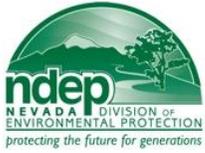
The Permittee will maintain a contemporaneous log containing, at a minimum, the following recordkeeping:

- a. The calendar date of any required monitoring.
- b. The total daily throughput rate of grenades, for the corresponding date.
- c. The total daily throughput rate of Comp A5 in pounds, for the corresponding date.
- d. The total daily hours of operation, for the corresponding date.
- e. The corresponding average hourly throughput rate in grenades per hour and pounds of Comp A5 per hour. The average hourly throughput rates will be determined from the total daily throughput rates and the total daily hours of operation recorded in 4.b., 4.c and 4.d above.

5. Application for Revision to Existing Class I Air Quality Operating Permit (NAC 445B.3366)

The Permittee shall submit a complete Class I application for revision to Air Quality Operating Permit AP9711-0863.02 within 12 months after the notification date of initial startup for **S2.003 and S2.004**, covered in this Operating Permit to Construct.

*******End of Specific Operating Conditions*******



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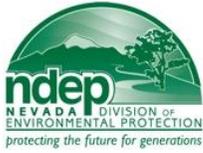
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Section VI. Emission Caps

A. No Emission Caps Defined.

*******End of Emission Caps*******



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Section VII. Surface Area Disturbance Conditions

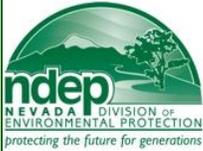
Surface area disturbance in excess of 20 acres.

- A. Dust Control Plan (NRS 445B.230.6)
The Permittee may not cause or permit the construction, repair, or demolition work, or the use of unpaved or untreated areas without applying all such measures as may be required by the Director to prevent particulate matter from becoming airborne.

- B. Permittee will control fugitive dust in accordance with the dust control plan entitled "Plan for Control of Fugitive Particulate Matter Emissions from Surface Area Disturbance Activities at Hawthorne Army Depot (HWAD) Main Base", as contained in Appendix 8 of the Class I-B Operating Permit Renewal Application for Class I Air Quality Operating Permit AP9711-0863.01, submitted November 17, 2008.

- C. NAC 445B.22037
Fugitive Dust
 - 1. The Permittee may not cause or permit the handling, transporting, or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.
 - 2. Except as otherwise provided in subsection 4, the Permittee may not cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in this subsection, "best practical methods" includes, but is not limited to, paving, chemical stabilization, watering, phased construction, and revegetation.
 - 3. Except as provided in subsection 4, the Permittee may not disturb or cover 5 acres or more of land or its topsoil until the permittee has obtained an Permit to construct for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.
 - 4. The provisions of subsections 2 and 3 do not apply to:
 - a. Agricultural activities occurring on agricultural land; or
 - b. Surface disturbances authorized by a permit issued pursuant to NRS 519A.180 which occur on land which is not less than 5 acres or more than 20 acres.

*******End of Surface Area Disturbance Conditions *******



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Section VIII. Amendments

April 4, 2011 – New OPTC. Application submitted 11/15/2011. Application Log# 11AP0146.

June XX, 2012 – Revised OPTC. Application submitted 03/1/2012. Application Log# 12AP0349.

- Revise Comp A5 grenade processing systems. System 1 and 2 modified to increase grenade process rate, increase Comp A5 process rate, and revise collection systems. System 3 and System 4 have been removed.
- PM//PM₁₀ emissions reduced by 2.25 tons per year.

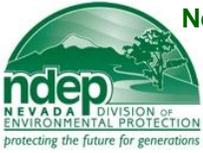
This Permit to construct:

1. **Is non-transferable. (NAC 445B.287)**
2. **Will be posted conspicuously at or near the stationary source. (NAC 445B.318)**
3. **Will expire if construction is not commenced within 18 months after the date of issuance or if construction of the facility is delayed for 18 months after initiated. (NAC 445B.3366)**
4. **Will expire if a complete application for a Class I operating permit or modification of an existing Class I operating permit is not submitted within 12 months after the initial start-up. (NAC 445B.3366)**
5. **Any party aggrieved by the Department's decision to issue this permit may appeal to the State Environmental Commission (SEC) within ten days after the date of notice of the Department's action. (NRS 445B.340)**
6. **The Permittee shall submit a complete Class I application within 12 months after the notification date of commencement of operation as required in this permit to construct. (NAC 445B.3361)**

Signature Draft Copy

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

Phone: (775) 687-9495 **Date:** _____



BUREAU OF AIR POLLUTION CONTROL

CLASS 1 NON-PERMIT EQUIPMENT LIST

Appended to DEPARTMENT OF THE ARMY, HAWTHORNE ARMY DEPOT, A0022, AP9711-2757 (OPTC)

Emission Unit #	Emission Unit Description
N/A	No additional Non-Permit Equipment proposed as part of this OPTC.

Note: *The equipments listed on this attachment are subject to all applicable requirements of the NAC and ASIP.*