

**NEVADA DIVISION OF ENVIRONMENTAL PROTECTION  
BUREAU OF SUSTAINABLE MATERIALS MANAGEMENT**

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**FACT SHEET FOR A RCRA HAZARDOUS WASTE MANAGEMENT PERMIT  
HAWTHORNE ARMY DEPOT MAIN BASE FACILITY  
EPA ID #NV1210090006  
PERMIT NUMBER NEVHW0032**

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The Nevada Division of Environmental Protection (NDEP) has developed this FACT SHEET for the Resource Conservation and Recovery Act (RCRA) Permit which NDEP intends to approve for Hawthorne Army Depot for the Main Base facility in Mineral County, Nevada. The DRAFT PERMIT is based on the renewal application received by NDEP for the continued operation of this hazardous waste management facility. This FACT SHEET has been prepared in accordance with the public notice requirements of *Nevada Administrative Code (NAC) 444.8632* and *Chapter 40 Code of Federal Regulations (CFR) Section 124.8*. The purpose of this FACT SHEET is to provide interested citizens and other governmental agencies a summary description of the principal facts and significant issues NDEP has considered in reviewing the submitted permit renewal application and developing the DRAFT PERMIT for the proposed management of hazardous waste facility.

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### **FACILITY DESCRIPTION**

The Hawthorne Army Depot (HWAD) Main Base facility is located on 147,236 acres of federal land which has been withdrawn from use just south of Walker Lake in Mineral County, Nevada. The Main Base facility is a government-owned, contractor-operated installation. The agent for the facility is the Department of the Army. Routine facility operation and maintenance are performed by contract operator Amentum Services, Inc. The Main Base facility contains the following hazardous waste management units:

- Eight (8) “Waste Munition Items” Storage Magazines (116 Group);
- Four (4) Hazardous Waste Storage Buildings (106-22, 106-23, 115-9, 113-73A);
- Three (3) Container Storage Units for U.S. Government Controlled Assets (104-5, 104-6, 49-1);
- One (1) Rotary Furnace (RF-9);
- One (1) Plasma Ordnance Demilitarization System (PODS) [currently inactive];
- One (1) Bulk Energetic Demilitarization System (BEDS) [currently inactive]; and
- One (1) Open Burning Unit (Old Bomb).

### **Container Storage**

The DRAFT PERMIT allows the facility to store containerized hazardous waste in four designated hazardous waste storage buildings, not to exceed a total combined capacity of 3,972 55-gallon drums, or equivalent; and containerized U.S. Government controlled hazardous waste assets in eight designated storage magazines, not to exceed a total combined capacity of 9,216 55-gallon drums, or equivalent. The facility may store a total of 75,000 lbs, 125,000 lbs, and 150,000 lbs of U.S. Government controlled assets in buildings 104-5, 104-6, 49-1 (respectively).

### **Subpart X Unit**

The DRAFT PERMIT allows the facility to open burn hazardous waste propellants at the Old Bomb unit which cannot be processed through the RF-9 incinerator or other U.S. Government controlled waste asset units, recycled or reused. Treatment is not to exceed 20,000 pounds of Net Explosive Weight (NEW) per day and 3,900,000 pounds of NEW per year.

### **Incinerators**

The DRAFT PERMIT allows the facility to treat U.S. Government controlled hazardous waste assets in the RF-9 incinerator, not to exceed 240 pounds of NEW per hour and 500 tons of NEW per calendar year.

If the Plasma Ordnance Demilitarization System (PODS) is reactivated, the DRAFT PERMIT will allow the facility to treat U.S. Government controlled hazardous waste assets in the PODS incinerator, contingent upon renewal of the site Certificate of Designation (COD) variance, completion of a cumulative Human Health and Ecological Risk Assessment (HHERA), and approval of a formal permit modification. The treatment limit at PODS will be established by the results of the HHERA and the respective Air Pollution Control (APC) Permit.

If the Bulk Energetic Demilitarization System (BEDS) is reactivated, the DRAFT PERMIT will allow the facility to begin testing the BEDS incinerator, contingent upon renewal of the site COD variance, completion of a cumulative HHERA, and approval of a formal permit modification. The operating limits at BEDS will be determined by the APC Permit performance testing and the results of the HHERA.

### **TYPES OF WASTE TO BE HANDLED**

U.S. Government controlled waste assets that will be stored and treated at HWAD Main Base originate onsite or, in case of emergencies, from the U.S. Government. Any hazardous waste that cannot be treated onsite must be shipped to an off-site permitted treatment or disposal facility. The facility is authorized to store and/or treat only those waste identified within the permit application. The facility is not authorized to accept chemical or bio-hazardous, radioactive or dioxin-containing wastes.

### **MONITORING**

The Permittee is required to conduct quarterly soil sampling at and around Old Bomb, an open burning unit, as described in Section C of Appendix B (Waste Analysis Plan) of the Permit Renewal Application.

### **CORRECTIVE ACTION**

Due to historical releases of hazardous chemicals at the HWAD Main Base facility, there are at least 8 sites that still require further investigation and/or remediation activities. Through the Department of Defense (DOD) Installation Restoration Program (IRP), with oversight from the NDEP Bureau of Corrective Actions, HWAD has initiated remedial investigations and/or cleanup activities at most of the legacy sites. The Draft Permit refers to these sites as Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) with respective descriptions in Section 12B of the Draft Permit. Additional details are available in the respective DOD Installation Action Plan (FY2018).

## **BASIS FOR THE PERMIT CONDITIONS**

The DRAFT PERMIT conditions are established pursuant to the authority of Section 3006 of the Resource Conservation and Recovery Act (RCRA) (Chapter 40 Code of Federal Regulations as codified in Part 271), 40 CFR Parts 124, and 260 through 270, Nevada Revised Statutes (NRS) 459-520 and Nevada Administrative Code (NAC) 444.842 through 444.8746, 444.940 through 444.9555, and 444.960. These laws and regulations govern the management of hazardous waste in the State of Nevada. NDEP, as the authorized permitting agency for the State of Nevada, has reviewed the permit renewal application submitted by HWAD Main Base and has determined that the facility can be operated under the proposed permit conditions in accordance with applicable regulations and in a manner which is protective of public health and the environment.

Unit-specific operation and maintenance requirements in the draft permit also contain provisions for: waste analysis for proper management of hazardous waste; contingency plan and preparedness requirements to prevent and respond to releases of hazardous waste; personnel training requirements; inspection and record-keeping requirements; and unit-specific closure requirements. HWAD Main Base is also required to maintain and operate U.S. Government controlled asset recycling and reutilization operations at the Western Area Demilitarization Facility (WADF); and to conduct corrective action at solid waste management units (SWMUs) due to past releases of hazardous constituents. HWAD Main Base has already initiated corrective action at these units. Additionally, the Permittee must annually certify that given safety and environmental considerations, open burning at Old Bomb is the most practicable method currently available for the treatment of waste propellants in a manner which minimizes present and future threats to human health and the environment; and that the wastes cannot be treated or recycled using other means.

## **REQUESTED VARIANCES**

When the Plasma Ordnance Demilitarization System (PODS) was first proposed, a variance to Nevada Administrative Code (NAC) 444.8456 1(d) was applied for and initially approved by the State Environmental Commission (SEC) on February 10, 1998. The variance was required prior to construction of the PODS unit because it is located in an area where the water table rises to within 150 feet of the ground surface. After multiple test runs, PODS was placed into temporary closure and not reactivated during the last permit period. If the Permittee determines to reactivate the PODS unit, the Permittee must apply for and obtain a reissued variance from the SEC prior to initiating the respective permit modification.

## **PROCEDURES FOR REACHING A FINAL DECISION**

*Section 7004(b) of RCRA, NAC 444.8632, and 40 CFR Section 124.10* require that the public and interested agencies be given at least forty-five (45) days to comment on each draft Permit prepared under RCRA. The most recent comment period for the HWAD Main Base facility ended on **May 11, 2020** (Permit Renewal).

The ADMINISTRATIVE RECORD for the DRAFT PERMIT, which includes the APPLICATION, AGENCY AND APPLICANT CORRESPONDENCE AND MEMORANDA, DRAFT PERMIT, and this FACT SHEET, are available for public review, by appointment, between the hours of **8:00 a.m. and 5:00 p.m., Monday through Friday** at the NDEP offices in

Carson City. Permitting information may be obtained by contacting **Jocelyn Samonez** of NDEP by phone at **(775) 687-1036** or, by e-mail at [jsamonez@ndep.nv.gov](mailto:jsamonez@ndep.nv.gov); or by visiting NDEP's website at <https://ndep.nv.gov/land/waste/hazardous-waste-management/permitted-td-facilities-and-camu>.

The DRAFT permit to include the Class 2 permit mod will be released for public notice on April 21, 2026. The Administrative Record for this RCRA permit mod, which includes the Class 2 Permit Mod, Fact Sheet, and Draft Permit, may be viewed on the NDEP website at: <https://ndep.nv.gov/posts/category/public-notice>. Publicly available digital records regarding the HWAD – Main Base facility may be accessed through the NDEP's OnBase document search engine which can be accessed at: <https://ndep-onbase.nv.gov>. Additionally, documents are available for public review Monday through Friday between the hours of 8:00 am and 5:00 pm at the NDEP office located at 901 South Stewart Street, Suite 4001 in Carson City, Nevada by contacting NDEP Bureau of Sustainable Materials Management (BSMM) administration at (775) 687-9462.

A copy of the DRAFT PERMIT, which includes the APPLICATION and this FACT SHEET, may also be viewed, by appointment Monday through Thursday, at the offices of **Amentum Services, Inc.** in Hawthorne, NV or by contacting **Rob Ralston, Amentum Services** at **(435) 830-3771** or [rob.ralston@amentum.com](mailto:rob.ralston@amentum.com).

When NDEP makes a final decision to either issue or deny the permit, notice will be given to HWAD Main Base and to each person who has submitted written comments or requested a notice of the final decision. In the event that significant comments are received, the final permit decision shall become effective thirty (30) days after service of the notice of decision unless a later date is specified or an appeal is filed with the State Environmental Commission (within ten (10) days after the notice of the action of the Department) pursuant to *NAC 444.980*. If no comments are received regarding the draft permit, the final permit, reflecting the conditions in the draft permit, shall become effective immediately upon issuance.

Please bring the foregoing notice to the attention of all persons whom you believe would be interested in this matter.