

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

**Rawhide Mining, LLC
Mineral County, Nevada
September 18, 2023**

Rawhide Mining, LLC (Rawhide) submitted an application for an administrative renewal of Class I Air Quality Operating Permit AP1041-2892.02, FIN A0406, for the Rawhide facility in Mineral County, Nevada. The project is located approximately 55 miles southeast of Fallon off State Route 839, in all or portions of Sections 4-10, 15-17, 22, 23, 26, Township 13N, Range 32E; Sections 31 and 32, Township 14N, Range 32E, M.D.B.&M.

Rawhide Mining, LLC is an open pit mine which includes extraction, processing and refining of gold ores. Rawhide is proposing to renew their Class I AQOP. There are no changes in emissions.

The Nevada Division of Environmental Protection – Bureau of Air Pollution Control (BAPC) has reviewed the application for the above-referenced operating permit, and has made a preliminary determination to issue the operating permit. The facility-wide Potential to Emit (PTE), including emissions from Non-Permit equipment are given in the table below.

Current emissions estimates indicate Rawhide is a minor source as emissions of one or more criteria pollutant are less than 100 tons per year (TPY), but the facility is subject to 40 CFR Part 63 Subpart EEEEEEE and is required to have a Class I (Title V) operating permit. Rawhide is classified as an area source of HAPs as the PTE for a single HAP is less than 10 TPY and combined HAPs are less than 25 TPY.	<i>Rawhide Mining, LLC Potential to Emit (PTE)</i>			
	Pollutant		Class I (tons/year)	Facility-Wide (tons/year)
	PM	Particulate Matter	1.17	228.4
	PM ₁₀	Particulate Matter ≤ 10 microns in diameter	1.17	85.7
	PM _{2.5}	Particulate Matter ≤ 2.5 microns in diameter	1.17	15.7
	SO ₂	Sulfur Dioxide	0.00	0.26
	NO _x	Oxides of Nitrogen	0.00	6.87
	CO	Carbon Monoxide	0.00	0.00
	VOC	Volatile Organic Compounds	0.00	1.26
	Pb	Lead	0.00	0.00
	Hg	Mercury	3.85E-03	3.85E-03
	HAP (single)	Hazardous Air Pollutants	0.00	< 10
	HAPs (all)	Hazardous Air Pollutants	0.00	< 25
	GHG (CO _{2e})	Greenhouse Gases (Carbon Dioxide Equivalent)	0.00	3,039.7

The project is located in Air Quality Hydrographic Area (HA) 122 of the Gabbs Valley and 123 of the Rawhide Flats. HA 122 and 123 are not triggered basins for an increment analysis. Rawhide will be subject to 40 CFR Part 63 Subpart EEEEEEE – Gold Mine Ore Processing and Production Area Source Category.

Air dispersion modeling conducted by the applicant and the Nevada Division of Environmental Protection – Bureau of Air Quality Planning (BAQP) demonstrates that continued operation of Rawhide will not violate any air quality standard.

Prevention of Significant Deterioration (PSD) review is not triggered for this permit action. No adverse air quality impacts are anticipated as a result of the proposed action. Rawhide shall comply with all State and Federal air quality requirements and all conditions established within the proposed draft operating permit.