

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

**Comstock Processing LLC
Billy the Kid Mine
Storey County, Nevada
March 7, 2025**

Comstock Processing LLC (Billy the Kid Mine) submitted an application for an administrative renewal Class II Air Quality Operating Permit, AP1041-4051.01, FIN A0404, for the Billy the Kid Mine facility in Storey County, Nevada. The project is located on American Flat Toll Road, off of Highway 342, south of Virginia City., in all or portions of Sections 5 through 8, Township 16N, Range 21E, M.D.B.&M.

This permit action will renew the existing permit with minor updates to System 23, which are results of error corrections from the previous permit. System 11 will also have minor changes due to updated calculations.

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.

	<i>Billy the Kid Mine Potential to Emit (PTE)</i>			
	Pollutant		Revision Net Change (tons/year)	Facility-Wide (tons/year)
	Current emissions estimates indicate Billy the Kid Mine is a <i>Class II source</i> , because the facility-wide PTE for any individual regulated pollutant is <i>less</i> than 100 tons per year.	PM	Particulate Matter	-2.79
PM₁₀		Particulate Matter ≤ 10 microns in diameter	-1.07	53.01
PM_{2.5}		Particulate Matter ≤ 2.5 microns in diameter	-0.26	27.84
SO₂		Sulfur Dioxide	0.00	0.16
NO_x		Oxides of Nitrogen	-1.32	76.98
CO		Carbon Monoxide	-0.77	33.23
VOC		Volatile Organic Compounds	-0.02	4.01
Pb		Lead	0.00	0.00
HAPs (all)		Hazardous Air Pollutants	-0.01	0.17

The project is located in Air Quality Hydrographic Area (HA) 103 of the Dayton Valley. HA 103 is not a triggered basin for an increment analysis. Billy the Kid Mine will be subject to 40 CFR Part 60 Subparts LL, IIII, and JJJJ, and 40 CFR Part 63 Subpart CCCCCC, and ZZZZ.

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 Billy the Kid Mine, will not violate any air quality standard.

Billy the Kid Mine must comply with all State and Federal air quality requirements and all conditions established within the proposed draft Class II Air Quality Operating Permit.