



Bureau of Air Pollution Control

901 SOUTH STEWART STREET SUITE 4001
CARSON CITY, NEVADA 89701-5249
p: 775-687-9349 • ndep.nv.gov/air

Facility ID No. A0499

Draft Permit No. AP2491-0095.06

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION (HEREINAFTER REFERRED TO AS PERMITTEE)

Mailing Address: 1640 MARC STREET, TACOMA, WASHINGTON 98421

Physical Address: 1680 SPRUCE AVENUE, SILVER SPRINGS, NEVADA 89429

Driving Directions: FROM US HWY 50 AND US 95 ALT SOUTH HIGHWAY IN SILVER SPRINGS, DRIVE SOUTH ON US 95 ALT SOUTH TO SPRUCE AVENUE. TURN LEFT ON SPRUCE AVENUE AND TRAVEL 0.7 MILES TO THE FACILITY.

General Facility Location: SECTION 30, T 18 N, R 25 E, MDB&M
HA 102 – CHURCHILL VALLEY / LYON COUNTY
NORTH 4,362,530 M, EAST 308,940 M, UTM ZONE 11, NAD 83

Emission Unit List:

A. System 01 – Four Pass Natural Gas-Fired Tube Generator

S2.001 6.32 MMBtu/hr Four Pass Natural Gas-Fired Tube Generator, mfd by Cleaver-Brooks, mdl# CB700-150-150ST

B. System 02 – Natural Gas-Fired Tube Boiler (Revision – Air Case 12130, February 2025)

S2.002 11.34 MMBtu/hr Natural Gas-Fired Tube Boiler, mfd by Hurst, mdl# S5X-200-150-S

C1. System 03A – Horizontal Wood Treating Cylinders (Revision – Air Case 12130, February 2025)

~~S2.003 72" x 105' Horizontal Wood Treating Cylinder, Retort B, mfd by National Builder (replaced by S2.016)~~
S2.016 102' length x 8' diameter Horizontal Wood Treating Cylinder, Retort B, mfd by Quality Tank Company
~~S2.004 96" x 90' Horizontal Wood Treating Cylinder, Retort C, mfd by Southwest Forest Industries (replaced by S2.014)~~
S2.014 110' length x 10' diameter Horizontal Wood Treating Cylinder, Retort C, mfd by Quality Tank Company
~~S2.005 120" x 105' Horizontal Wood Treating Cylinder, Retort A, mfd by Quality Tank Company (replaced by S2.015)~~
S2.015 105' length x 10' diameter Horizontal Wood Treating Cylinder, Retort A, mfd by Quality Tank Company

C2. System 03B – Treated Wood Drip Pad (Revision – Air Case 12130, February 2025)

PF1.004 Treated Wood Drip Pad

D1. System 04A – Preservative Dissolving System (Pentachlorophenol Scenario) (Removed – Air Case 12130, February 2025)

~~S2.006A 4'W x 5'H x 16'L Preservative Dissolving Tank (2,394 Gallons) – Pentachlorophenol Operations~~

D2. System 04B – Preservative Dissolving System (DCOI Scenario)

S2.006B 4'W x 5'H x 16'L Preservative Dissolving Tank (2,394 Gallons) – DCOI Operations

E. System 05 – Work Tanks (DCOI, CuNap Preservatives) (Revision – Air Case 12130, February 2025)

S2.007 75,202 Gallon Work Tank 3 (DCOI, Copper Napthenate Preservatives)
S2.008 29,857 Gallon Work Tank 1 (DCOI, Copper Napthenate Preservatives, previously IA1.022)
S2.009 27,216 Gallon Work Tank 2 (DCOI, Copper Napthenate Preservatives, previously IA1.023)
~~S2.010 12,720 Gallon Work Tank 4 (DCOI, Copper Napthenate Preservatives, previously IA1.003) (removed)~~
~~S2.011 12,720 Gallon Work Tank 5 (DCOI, Copper Napthenate Preservatives, previously IA1.004) (removed)~~
S2.012 35,533 Gallon Work Tank 6 (DCOI, Copper Napthenate Preservatives)
S2.013 35,533 Gallon Work Tank 7 (DCOI, Copper Napthenate Preservatives)

F. System 06 – 600 HP Fulton Steam Boiler (Added – Air Case 12130, February 2025)

S2.017 20.1 MMBtu/hr Natural Gas-Fired Steam Boiler, mfd by Fulton, mdl# FB-S-600, mfd 2024

*****End of Emission Unit List*****



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Section I. General Provisions

- A. Prohibited acts; penalty; establishment of violation; request for prosecution (NRS 445B.470) (*State Only Requirement*)
1. A person shall not knowingly:
 - a. Violate any applicable provision, the terms or conditions of any permit or any provision for the filing of information;
 - b. Fail to pay any fee;
 - c. Falsify any material statement, representation or certification in any notice or report; or
 - d. Render inaccurate any monitoring device or method, required pursuant to the provisions of NRS 445B.100 to 445B.450, inclusive, or 445B.470 to 445B.640, inclusive, or any regulation adopted pursuant to those provisions.
 2. Any person who violates any provision of subsection 1 shall be punished by a fine of not more than \$10,000 for each day of the violation.
 3. The burden of proof and degree of knowledge required to establish a violation of subsection 1 are the same as those required by 42 U.S.C. § 7413(c), as that section existed on October 1, 1993.
 4. If, in the judgment of the Director of the Department or the Director's designee, any person is engaged in any act or practice which constitutes a criminal offense pursuant to NRS 445B.100 to 445B.640, inclusive, the Director of the Department or the designee may request that the Attorney General or the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.
 5. If, in the judgment of the control officer of a local air pollution control board, any person is engaged in such an act or practice, the control officer may request that the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.
- B. Visible emissions: Maximum opacity; determination and monitoring of opacity (NAC 445B.22017) (*Federally Enforceable SIP Requirement*)
1. Except as otherwise provided in this section and NAC 445B.2202, no owner or operator may cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity must be determined by one of the following methods:
 - a. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in Appendix A of 40 CFR Part 60.
 - b. If a source uses a continuous monitoring system for the measurement of opacity, the data must be reduced to 6-minute averages as set forth in 40 CFR 60.13(h).
 2. The provisions of this section and NAC 445B.2202 do not apply to that part of the opacity that consists of uncombined water. The burden of proof to establish the application of this exemption is upon the person seeking to come within the exemption.
 3. If the provisions of 40 CFR Part 60, Subpart D or Da apply to an emission unit, the emission unit must be allowed one 6-minute period per hour of not more than 27 percent opacity as set forth in 40 CFR 60.42(a)(2) and 40 CFR 60.42a(b).
 4. The continuous monitoring system for monitoring opacity at a facility must be operated and maintained by the owner or operator specified in the permit for the facility in accordance with NAC 445B.256 to 445B.267, inclusive.
- C. Visible emissions: Exceptions for stationary sources (NAC 445B.2202) (*Federally Enforceable SIP Requirement*)
- The provisions of NAC 445B.22017 do not apply to:
1. Smoke from the open burning described in NAC 445B.22067;
 2. Smoke discharged in the course of training air pollution control inspectors to observe visible emissions, if the facility has written approval of the Commission;
 3. Emissions from an incinerator as set forth in NAC 445B.2207; or
 4. Emissions of stationary diesel-powered engines during warm-up for not longer than 15 minutes to achieve operating temperatures.



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Section I. General Provisions (continued)

D. Odors (NAC 445B.22087) (*State Only Requirement*)

1. No person may discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents the comfortable enjoyment of life or property.
2. The Director shall investigate an odor when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy. The sample must be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.
3. The Director shall deem the odor to be a violation if he or she is able to make two odor measurements within a period of 1 hour. These measurements must be separated by at least 15 minutes. An odor measurement consists of a detectable odor after the odorous air has been diluted with eight or more volumes of odor-free air.

E. Prohibited Conduct: Concealment of Emissions (NAC 445B.225) (*Federally Enforceable SIP Requirement*)

No person may install, construct or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere.

F. Prohibited conduct: Operation of source without required equipment; removal or modification of required equipment; modification of required procedure (NAC 445B.227) (*Federally Enforceable SIP Requirement*)

Except as otherwise provided in NAC 445B.001 to 445B.390, inclusive, no person may:

1. Operate a stationary source of air pollution unless the control equipment for air pollution which is required by applicable requirements or conditions of this Operating Permit is installed and operating.
2. Disconnect, alter, modify or remove any of the control equipment for air pollution or modify any procedure required by an applicable requirement or condition of the permit.

G. Excess Emissions (NAC 445B.232) (*State Only Requirement*)

1. Scheduled maintenance or testing or scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive, must be approved in advance by the Director and performed during a time designated by the Director as being favorable for atmospheric ventilation.
2. Each owner or operator shall notify the Director of the proposed time and expected duration at least 30 days before any scheduled maintenance or testing which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled maintenance or testing must not be conducted unless the scheduled maintenance or testing is approved pursuant to subsection 1.
3. Each owner or operator shall notify the Director of the proposed time and expected duration at least 24 hours before any scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled repairs must not be conducted unless the scheduled repairs are approved pursuant to subsection 1.
4. Each owner or operator shall notify the Director of any excess emissions within 24 hours after any malfunction or upset of the process equipment or equipment for controlling pollution or during start-up or shutdown of that equipment.



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Section I. General Provisions (continued)

G. Excess Emissions (NAC 445B.232) (*State Only Requirement*) (continued)

5. Each owner or operator shall provide the Director, within 15 days after any malfunction, upset, start-up, shutdown or human error which results in excess emissions, sufficient information to enable the Director to determine the seriousness of the excess emissions. The information must include at least the following:
 - a. The identity of the stack or other point of emission, or both, where the excess emissions occurred.
 - b. The estimated magnitude of the excess emissions expressed in opacity or in the units of the applicable limitation on emission and the operating data and methods used in estimating the magnitude of the excess emissions.
 - c. The time and duration of the excess emissions.
 - d. The identity of the equipment causing the excess emissions.
 - e. If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunction.
 - f. The steps taken to limit the excess emissions.
 - g. Documentation that the equipment for controlling air pollution, process equipment or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.
6. Each owner or operator shall ensure that any notification or related information submitted to the Director pursuant to this section is provided in a format specified by the Director.

H. Testing and Sampling (NAC 445B.252) (*Federally Enforceable SIP Requirement*)

1. To determine compliance with NAC 445B.001 to 445B.390, inclusive, before the approval or the continuance of an operating permit or similar class of permits, the Director may either conduct or order the owner of any stationary source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and sampling or either of them must be conducted and the results submitted to the Director within 60 days after achieving the maximum rate of production at which the affected facility will be operated, but not later than 180 days after initial start-up of the facility and at such other times as may be required by the Director.
2. Tests of performance must be conducted and data reduced in accordance with the methods and procedures of the test contained in each applicable subsection of this section unless the Director:
 - a. Specifies or approves, in specific cases, the use of a method of reference with minor changes in methodology;
 - b. Approves the use of an equivalent method;
 - c. Approves the use of an alternative method, the results of which the Director has determined to be adequate for indicating whether a specific stationary source is in compliance; or
 - d. Waives the requirement for tests of performance because the owner or operator of a stationary source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
3. Tests of performance must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The owner or operator shall make available to the Director such records as may be necessary to determine the conditions of the performance test. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of a performance test unless otherwise specified in the applicable standard.
4. The owner or operator of an affected facility shall give notice to the Director 30 days before the test of performance to allow the Director to have an observer present. A written testing procedure for the test of performance must be submitted to the Director at least 30 days before the test of performance to allow the Director to review the proposed testing procedures.
5. Each test of performance must consist of at least three separate runs using the applicable method for that test. Each run must be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions or other circumstances with less than three valid samples being obtained, compliance may be determined using the arithmetic mean of the results of the other two runs upon the Director's approval.
6. All testing and sampling will be performed in accordance with recognized methods and as specified by the Director.



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Section I. General Provisions (continued)

H. Testing and Sampling (NAC 445B.252) (*Federally Enforceable SIP Requirement*) (continued)

7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power and other pertinent allied facilities as may be required and specified in writing by the Director must be provided and paid for by the owner of the stationary source.
8. All information and analytical results of testing and sampling must be certified as to their truth and accuracy and as to their compliance with all provisions of these regulations, and copies of these results must be provided to the Director no later than 60 days after the testing or sampling, or both.
9. Notwithstanding the provisions of subsection 2, the Director shall not approve an alternative method or equivalent method to determine compliance with a standard or emission limitation contained in Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations for:
 - a. An emission unit that is subject to a testing requirement pursuant to Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations; or
 - b. An affected source.

I. Permit Revision (NAC 445B.287(1)(b)) (*Federally Enforceable SIP Requirement*)

If a stationary source is a Class II source, a revision of the operating permit or the permit to construct is required pursuant to the requirements of NAC 445B.3465 before the stationary source may be modified.

J. Violations: Acts constituting; notice (NAC 445B.275) (*Federally Enforceable SIP Requirement*)

1. Failure to comply with any requirement of NAC 445B.001 to 445B.390, inclusive, any applicable requirement or any condition of an operating permit constitutes a violation. As required by NRS 445B.450, the Director shall issue a written notice of an alleged violation to any owner or operator for any violation, including, but not limited to:
 - a. Failure to apply for and obtain an operating permit;
 - b. Failure to construct a stationary source in accordance with the application for an operating permit as approved by the Director;
 - c. Failure to construct or operate a stationary source in accordance with any condition of an operating permit;
 - d. Commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit as required by NAC 445B.001 to 445B.3477, inclusive, or a mercury operating permit to construct as required by NAC 445B.3611 to 445B.3689, inclusive;
 - e. Failure to comply with any requirement for recordkeeping, monitoring, reporting or compliance certification contained in an operating permit; or
 - f. Failure to pay fees as required by NAC 445B.327 or 445B.3689.
2. The written notice must specify the provision of NAC 445B.001 to 445B.390, inclusive, the condition of the operating permit or the applicable requirement that is being violated.
3. Written notice shall be deemed to have been served if delivered to the person to whom addressed or if sent by registered or certified mail to the last known address of the person.

K. Operating permits: Imposition of more stringent standards for emissions (NAC 445B.305)

(*Federally Enforceable SIP Requirement*)

1. The Director may impose standards for emissions on a proposed stationary source that are more stringent than those found in NAC 445B.001 to 445B.390, inclusive, as a condition of approving an operating permit for the proposed stationary source.



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Section I. General Provisions (continued)

L. Contents of operating permits: Exception for operating permits to construct; required conditions (NAC 445B.315)
(*Federally Enforceable SIP Requirement*)

1. Notwithstanding any provision of this section to the contrary, the provisions of this section do not apply to operating permits to construct.
2. The Director shall cite the legal authority for each condition contained in an operating permit.
3. An operating permit must contain the following conditions:
 - a. The term of the operating permit is 5 years.
 - b. The holder of the operating permit shall retain records of all required monitoring data and supporting information for 5 years after the date of the sample collection, measurement, report or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment and all original strip-chart recordings for continuous monitoring instrumentation.
 - c. Each of the conditions and requirements of the operating permit is severable, and if any are held invalid, the remaining conditions and requirements continue in effect.
 - d. The holder of the operating permit shall comply with all conditions of the operating permit. Any noncompliance constitutes a violation and is a ground for:
 - (1) An action for noncompliance;
 - (2) Revising, revoking, reopening and revising, or terminating the operating permit by the Director; or
 - (3) Denial of an application for a renewal of the operating permit by the Director.
 - e. The need to halt or reduce activity to maintain compliance with the conditions of the operating permit is not a defense to noncompliance with any condition of the operating permit.
 - f. The Director may revise, revoke and reissue, reopen and revise, or terminate the operating permit for cause.
 - g. The operating permit does not convey any property rights or any exclusive privilege.
 - h. The holder of the operating permit shall provide the Director, in writing and within a reasonable time, with any information that the Director requests to determine whether cause exists for revising, revoking and reissuing, reopening and revising, or terminating the operating permit, or to determine compliance with the conditions of the operating permit.
 - i. The holder of the operating permit shall pay fees to the Director in accordance with the provisions set forth in NAC 445B.327 and 445B.331.
 - j. The holder of the operating permit shall allow the Director or any authorized representative, upon presentation of credentials, to:
 - (1) Enter upon the premises of the holder of the operating permit where:
 - (a) The stationary source is located;
 - (b) Activity related to emissions is conducted; or
 - (c) Records are kept pursuant to the conditions of the operating permit;
 - (2) Have access to and copy, during normal business hours, any records that are kept pursuant to the conditions of the operating permit;
 - (3) Inspect, at reasonable times, any facilities, practices, operations or equipment, including any equipment for monitoring or controlling air pollution, that are regulated or required pursuant to the operating permit; and
 - (4) Sample or monitor, at reasonable times, substances or parameters to determine compliance with the conditions of the operating permit or applicable requirements.
 - k. A responsible official of the stationary source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the operating permit are true, accurate and complete.



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Section I. General Provisions (continued)

M. Operating permits: Revocation and reissuance (NAC 445B.3265) (*State Only Requirement*)

1. An operating permit may be revoked if the control equipment is not operating.
2. An operating permit may be revoked by the Director upon determining that there has been a violation of NAC 445B.001 to 445B.390, inclusive, or the provisions of 40 CFR 52.21, or 40 CFR Part 60 or 61, Prevention of Significant Deterioration, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants, adopted by reference in NAC 445B.221.
3. The revocation is effective 10 days after the service of a written notice, unless a hearing is requested.
4. To reissue a revoked operating permit, the holder of the revoked permit must file a new application with the Director, accompanied by the fee for an initial operating permit as specified in NAC 445B.327. An environmental review of the stationary source must be conducted as though construction had not yet commenced.

N. Required contents of permit (NAC 445B.346) (*Federally Enforceable SIP Requirement*)

In addition to the conditions set forth in NAC 445B.315, Class II operating permits must contain, as applicable:

1. Emission limitations and standards, including those operational requirements and limitations that ensure compliance with the conditions of the operating permit.
2. All requirements for monitoring, testing and reporting that apply to the stationary source.
3. A requirement that the owner or operator of the stationary source promptly report any deviations from any requirements of the operating permit.
4. The terms and conditions for any reasonably anticipated alternative operating scenarios identified by the owner or operator of the stationary source in his or her application and approved by the Director. Such terms and conditions must require the owner or operator to keep a contemporaneous log of changes from one alternative operating scenario to another.
5. A schedule of compliance for stationary sources that are not in compliance with any applicable requirement or NAC 445B.001 to 445B.390, inclusive:
 - a. Semiannual progress reports and a schedule of dates for achieving milestones;
 - b. Prior notice of and explanations for missed deadlines; and
 - c. Any preventive or corrective measures taken.

*****End of General Provisions*****



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Section II. General Monitoring, Recordkeeping, and Reporting Conditions

- A. Records Retention (NAC 445B.315(3)(b)) (*Federally Enforceable SIP Requirement*)
The holder of the operating permit shall retain records of all required monitoring data and supporting information for 5 years after the date of the sample collection, measurement, report or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment and all original strip-chart recordings for continuous monitoring instrumentation.
- B. Deviations (NAC 445B.346(3)) (*Federally Enforceable SIP Requirement*)
Under the authority of NAC 445B.346(3), and in addition to the conditions set forth in NAC 445B.315, the owner or operator of the stationary source shall promptly report to the Director any deviations from the requirements of the operating permit. The report to the Director shall include the probable cause of all deviations and any action taken to correct the deviations. For the operating permit, prompt is defined as submittal of a report within 15 days of the deviation. This definition does not alter any reporting requirements as established for reporting of excess emissions as required under NAC 445B.232 as reproduced in **Section I.G.**
E-mail notifications to: aircompliance@ndep.nv.gov
- C. Yearly Reports (NAC 445B.315(3)(h), NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)
Under the authority of NAC 445B.315(3)(h) and NAC 445B.346(2) the Permittee will submit yearly reports including, but not limited to, throughput, production, fuel consumption, hours of operation, emissions and supporting documentation to support the calculation of annual emissions. These reports and supporting documentation (if applicable) will be submitted via the State and Local Emissions Inventory System (SLEIS) maintained by the Bureau of Air Quality Planning for all emission units/systems specified. The completed report must be submitted to the Bureau of Air Quality Planning no later than March 1 annually for the preceding calendar year.

*****End of General Monitoring, Recordkeeping, and Reporting Conditions*****



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Section III. General Construction Conditions

A. Notification (NAC 445B.250; NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.250 and NAC 445B.346; the Director shall be notified in writing of the following for **S2.017**:

1. The date construction (or reconstruction as defined under NAC 445B.247) of the affected facility is commenced, postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
2. The anticipated date of initial startup of an affected facility, postmarked no more than 60 days and no less than 30 days prior to such date.
3. The actual date of initial startup of the affected facility, postmarked within 15 days after such date.
4. The date upon which demonstration of the continuous monitoring system performance commences in accordance with NAC 445B.256 to 445B.267, inclusive. Notification must be postmarked not less than 30 days before such date.

B. Notification (NAC 445B.250; NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.250 and NAC 445B.346; the Director shall be notified in writing of the following for **S2.002**:

1. The date **S2.002** is relocated to the new location (Site 2) and becomes operational, postmarked no later than 15 days after such date.

C. Notification (NAC 445B.250; NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Director shall be notified in writing of the following for **S2.014, S2.015, S2.016, S2.007, S2.008, S2.009, S2.012, and S2.013**:

1. The date that an **alternative emission control device is proposed to replace the existing Jet-Vac JV-9617 Fume Scrubber**.
2. The date that an **alternative emission control device replaces the existing Jet-Vac JV-9617 Fume Scrubber** and becomes operational, postmarked no later than 5 days after such date.
3. A revision of the operating permit may be required pursuant to the requirements of NAC 445B.3465.

*****End of General Construction Conditions*****



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Section IV. Specific Construction Requirements

- A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))
(Federally Enforceable SIP Requirement)
1. Under the authority of NAC 445B.22017, NAC 445B.252, and NAC 445B.346, the Permittee, upon issuance of this operating permit, shall conduct initial opacity compliance demonstrations and/or initial performance tests within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. The Permittee shall follow the test methods and procedures referenced in Table IV-1 and Table IV-2 below:
 2. All initial opacity compliance demonstrations and initial performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. Material sampling must be conducted in accordance with protocols approved by the Director. All initial performance test results shall be based on the arithmetic average of three valid runs. (NAC 445B.252(5))
 3. Testing shall be conducted on the exhaust stack (post controls for System 03A).
 4. Initial opacity compliance demonstrations and initial performance tests, as specified in Table IV-1 and Table IV-2 below, must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the initial opacity compliance demonstrations and initial performance tests. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of the initial opacity compliance demonstrations and initial performance tests unless otherwise specified in the applicable standard. (NAC 445B.252(3))
 5. The Permittee shall give notice to the Director 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to have an observer present. A written testing procedure must be submitted to the Director at least 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to review the proposed testing procedures. (NAC 445B.252(4) and 40 CFR Part 60.7(a)(6))
 6. Within 60 days after completing the initial opacity compliance demonstrations and initial performance tests contained in Table IV-1 and Table IV-2 of this section, the Permittee shall furnish the Director a written report of the results. All information and analytical results of testing and sampling must be certified as to the truth and accuracy and as to their compliance with NAC 445B.001 to 445B.3689, inclusive. (NAC 445B.252(8))
 7. Initial opacity compliance demonstrations and initial performance tests required under this section that are conducted below the maximum allowable throughput, shall be subject to the Director's review to determine if the throughputs during the initial opacity compliance demonstrations and initial performance tests were sufficient to provide adequate compliance demonstration. Should the Director determine that the initial opacity compliance demonstrations and initial performance tests do not provide adequate compliance demonstration, the Director may require additional testing.
 8. **The opacity compliance demonstrations and/or performance tests required for S2.014, S2.015, S2.016, and S2.017 in A.1 through A.7 of this section shall be satisfied by completing the requirements of Section VIII.A.2, Section VIII.A.3, and Section VIII.B.1 of this operating permit.**



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CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section IV. Specific Construction Requirements (continued)

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))
(Federally Enforceable SIP Requirement) (continued)

Table IV-1: Initial Opacity Compliance Demonstration

System	Emission Unit(s)	Pollutant To Be Tested	Testing Methods/Procedures
System 03A – Horizontal Wood Treating Cylinders (DCOI Preservative Scenario)	S2.014 S2.015 S2.016	Opacity Post-Control Emissions	Testing shall be conducted on each individual retort during normal operations, as specified in Section VIII.A.2 of this operating permit.
System 03A – Horizontal Wood Treating Cylinders (CuNap Preservative Scenario)	S2.014 S2.015 S2.016	Opacity Post-Control Emissions	Testing shall be conducted on each individual retort during normal operations, as specified in Section VIII.B.1 of this operating permit. Testing for the CuNap Preservative Scenario is only required if any of the retorts use CuNap Preservative. Notify aircompliance@ndep.nv.gov if Permittee is planning to conduct operations with CuNap Preservative at least 30 days before initiation of operations.
System 06 – 600 HP Fulton Steam Boiler	S2.017	Opacity	Testing shall be conducted as specified in Section VIII.A.4 of this operating permit.

Table IV-2: Initial Performance Tests

System*	Emission Unit(s)	Pollutants To Be Tested	Testing Methods/Procedures
System 03A – Horizontal Wood Treating Cylinders DCOI Preservative	S2.014 S2.015 S2.016	VOC + HAP Post-Control Emissions	Testing shall be conducted on each individual retort during normal operations, as specified in Section VIII.A.2 of this operating permit.
System 03A – Horizontal Wood Treating Cylinders CuNap Preservative	S2.014 S2.015 S2.016	VOC + HAP Post-Control Emissions	Testing shall be conducted on each individual retort during normal operations, as specified in Section VIII.B.1 of this operating permit. Testing for the CuNap Preservative Scenario is only required if any of the retorts use CuNap Preservative. Notify aircompliance@ndep.nv.gov if Permittee is planning to conduct operations with CuNap Preservative at least 30 days before initiation of operations.

* DCOI is 4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one. CuNap is Copper Napthenate



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Section IV. Specific Construction Requirements (continued)

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))
(*Federally Enforceable SIP Requirement*) (continued)

Table IV-2: Initial Performance Tests - continued

System	Emission Unit(s)	Pollutants To Be Tested	Testing Methods/Procedures
System 06 – 600 HP Fulton Steam Boiler	S2.017	PM	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.
		PM ₁₀ /PM _{2.5}	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.
		SO ₂	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.
		NO _x	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.
		CO	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.
		VOC	Testing shall be conducted as specified in Section VIII.A.3 of this operating permit.

******End of Specific Construction Requirements******



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Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section V. Specific Operating Conditions

A. Emission Unit S2.001

System 01 – Four Pass Natural Gas-Fired Tube Generator		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.001	6.32 MMBtu/hr Four Pass Natural Gas-Fired Tube Generator, mfd by Cleaver-Brooks, mdl# CB700-150-150ST	4,362,533	308,939

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. **S2.001** has no add-on controls.
 - b. Descriptive Stack Parameters
 Stack Height: 25.0 feet
 Stack Diameter: 1.3 feet
 Stack Temperature: 411 °F
 Exhaust Flow: 1,066 dry standard cubic feet per minute (dscfm)

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. **S2.001** may consume only **natural gas**.
 - b. The maximum allowable fuel consumption rate for **S2.001** shall not exceed **6,196.1 standard cubic feet (scf)** per any one-hour period.
 - c. Hours
 (1) **S2.001** may operate a total of **24** hours per day.

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.001** the following pollutants in excess of the following limits:
 - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.047** pounds per hour, nor more than **0.21** tons per year.
 - b. The discharge of **PM₁₀** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.047** pounds per hour, nor more than **0.21** tons per year.
 - c. The discharge of **PM_{2.5}** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.047** pounds per hour, nor more than **0.21** tons per year.
 - d. The discharge of **SO₂** (sulfur dioxide) to the atmosphere shall not exceed **0.0037** pounds per hour, nor more than **0.016** tons per year.
 - e. The discharge of **NO_x** (oxides of nitrogen) to the atmosphere shall not exceed **0.62** pounds per hour, nor more than **2.71** tons per year.
 - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.52** pounds per hour, nor more than **2.28** tons per year.
 - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.034** pounds per hour, nor more than **0.15** tons per year.
 - h. The opacity from **S2.001** shall not equal or exceed **20** percent.

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar dates of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the week, as appropriate.
 - a. Monitor and record the hours of operation for **S2.001** on a weekly basis.
 - b. Monitor and record the consumption rate of **natural gas** on a weekly basis for **S2.001**, in **standard cubic feet**, by use of a fuel flow meter.
 - c. Record the average hourly fuel consumption rate of **natural gas**, in **standard cubic feet per hour**, by dividing the total weekly consumption rate by the total weekly hours of operation.



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Section V. Specific Operating Conditions (continued)

B. Emission Unit S2.002

System 02 – Natural Gas-Fired Tube Boiler (Revised – Air Case 12130, February 2025)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.002	11.34 MMBtu/hr Natural Gas-Fired Tube Boiler, mfd by Hurst, mdl# S5X-200-150-S	4,362,533 (Site 1)	308,940 (Site 1)
		4,362,572 (Site 2)	308,924 (Site 2)

1. Air Pollution Control Equipment (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
 - a. **S2.002** has no add-on controls.
 - b. Descriptive Stack Parameters
 Stack Height: 27.0 feet
 Stack Diameter: 1.0 feet
 Stack Temperature: 580 °F
 Exhaust Flow: 1,631 dry standard cubic feet per minute (dscfm)

2. Operating Parameters (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
 - a. **S2.002** may consume only **natural gas**.
 - b. The maximum allowable fuel consumption rate for **S2.002** shall not exceed **11,117.6 standard cubic feet (scf)** per any one-hour period.
 - c. Hours
 (1) **S2.002** may operate a total of **24** hours per day.

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (Federally Enforceable SIP Requirement)
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.002** the following pollutants in excess of the following limits:
 - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.084** pounds per hour, nor more than **0.37** tons per year.
 - b. The discharge of **PM₁₀** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.084** pounds per hour, nor more than **0.37** tons per year.
 - c. The discharge of **PM_{2.5}** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.084** pounds per hour, nor more than **0.37** tons per year.
 - d. The discharge of **SO₂** (sulfur dioxide) to the atmosphere shall not exceed **0.0067** pounds per hour, nor more than **0.029** tons per year.
 - e. The discharge of **NO_x** (oxides of nitrogen) to the atmosphere shall not exceed **1.11** pounds per hour, nor more than **4.87** tons per year.
 - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.93** pounds per hour, nor more than **4.09** tons per year.
 - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.061** pounds per hour, nor more than **0.27** tons per year.
 - h. The opacity from **S2.002** shall not equal or exceed **20** percent.

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (Federally Enforceable SIP Requirement)
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar dates of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the week, as appropriate.
 - a. Monitor and record the hours of operation for **S2.002** on a weekly basis.
 - b. Monitor and record the consumption rate of **natural gas** on a weekly basis for **S2.002**, in **standard cubic feet**, by use of a fuel flow meter.
 - c. Record the average hourly fuel consumption rate of **natural gas**, in **standard cubic feet per hour**, by dividing the total weekly consumption rate by the total weekly hours of operation.



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Section V. Specific Operating Conditions (continued)

B. Emission Unit S2.002 (continued)

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
 - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
 - b. Testing shall be conducted on the exhaust stack (post controls).
 - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
 - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
 - a. Reporting and Recordkeeping Requirements (40 CFR Part 60.48c)
 - (1) The Permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include: (40 CFR Part 60.48c(a))
 - (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. (40 CFR 60.48c(a)(1))
 - (b) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. (40 CFR 60.48c(a)(3))
 - (2) Except as provided under 40 CFR 60.48(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. (40 CFR Part 60.48c(g))
 - (a) As an alternative to meeting the requirements of 40 CFR Part 60.48c (g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. (40 CFR 60.48c(g)(2))
 - (b) As an alternative to meeting the requirements of 40 CFR 60.48c (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. (40 CFR Part 60.48c(g)(3))
 - (3) All records required under 40 CFR Part 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. (40 CFR Part 60.48c(i))
 - (4) The reporting period for the reports required under 40 CFR Part 60, Subpart Dc, is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. (40 CFR Part 60.48c(j))



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Section V. Specific Operating Conditions (continued)

C1. Emission Units S2.014, S2.015, and S2.016

System 03A – Horizontal Wood Treating Cylinders (Revised – Air Case 12130, February 2025)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.003	72" x 105' Horizontal Wood Treating Cylinder, Retort B, mfd by National Builder (replaced by S2.016)	4,362,510	308,960
S2.016	102' length x 8' diameter Horizontal Wood Treating Cylinder, Retort B, mfd by Quality Tank Company	4,362,528	308,963
S2.004	96" x 90' Horizontal Wood Treating Cylinder, Retort C, mfd by Southwest Forest Industries (to be replaced by S2.014) (replaced by S2.014)	4,362,520	308,950
S2.014	110' length x 10' diameter Horizontal Wood Treating Cylinder, Retort C, mfd by Quality Tank Company	4,362,520	308,950
S2.005	120" x 105' Horizontal Wood Treating Cylinder, Retort A, mfd by Quality Tank Company (replaced by S2.015)	4,362,490	308,960
S2.015	105' length x 10' diameter Horizontal Wood Treating Cylinder, Retort A, mfd by Quality Tank Company	4,362,528	308,963

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. Emissions from **S2.014, S2.015, and S2.016** shall be ducted to a Jet-Vac JV-9617 Fume Scrubber.
 - b. Descriptive Stack Parameters
 Stack Height: 23.0 feet
 Stack Diameter: 1.5 feet
 Stack Temperature: Ambient + 10 °F

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. The maximum allowable volume of wood product for **S2.014** is **115,000** cubic feet per month.
 - b. The maximum allowable volume of wood product for **S2.015** is **115,000** cubic feet per month.
 - c. The maximum allowable volume of wood product for **S2.016** is **90,000** cubic feet per month.
 - d. The maximum allowable volume of wood product for **S2.014, S2.015, and S2.016, combined**, is **3,381,960** cubic feet per calendar year.
 - e. The allowable chemical wood preservatives for **S2.014, S2.015, and S2.016** include:
 - (1) Copper Napthenate solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (2) DCOI (4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one) solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (3) Permittee shall no longer use Pentachlorophenol as a wood preservative.
 - f. The Permittee shall notify aircompliance@ndep.nv.gov within 5 business days when there is a change in the type of wood preservative that is used to treat wood product in **S2.014, S2.015, and S2.016**.
 - g. Hours
 - (1) **S2.014, S2.015, and S2.016**, each, may operate a total of **24** hours per day.



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Section V. Specific Operating Conditions (continued)

C1. Emission Units S2.014, S2.015, and S2.016 (continued)

- 3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B.22017) (*Federally Enforceable SIP Requirement*)
The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.014, S2.015, and S2.016, combined**, the following pollutants in excess of the following specified limits:
 - a. The discharge of **VOC** (volatile organic compounds) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - b. The discharge of any **individual HAP** (hazardous air pollutant) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - c. The discharge of **combined HAP** (hazardous air pollutants) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - d. The opacity from **S2.014, S2.015, and S2.016**, each, shall not equal or exceed **20** percent.

- 4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
 - a. Monitor and record the volume of wood product for **S2.014, S2.015, and S2.016**, each, on a monthly basis in cubic feet.
 - b. Monitor and record the hours of operation for **S2.014, S2.015, and S2.016**, each, on a daily basis.
 - c. Monitor and record the total yearly throughput rate for **S2.014, S2.015, and S2.016**, combined, in cubic feet per year. The annual throughput shall be determined as the sum of the monthly throughput rates for the year for all previous months of that year.
 - d. Monitor and record the wood preservative utilized in **S2.014, S2.015, and S2.016**, each, on a per batch basis.
 - e. Material Safety Data Sheets (MSDS) of the utilized wood preservatives shall be kept on site.
 - f. Calculate and record the **VOC** emissions for **S2.014, S2.015, and S2.016**, combined, on a monthly basis in pounds.
 - g. Calculate and record the **individual HAP** emissions for **S2.014, S2.015, and S2.016**, combined, on a monthly basis in pounds.
 - h. Calculate and record the **combined HAP** emissions for **S2.014, S2.015, and S2.016**, combined, on a monthly basis in pounds.
 - i. Monthly **VOC and HAP** emissions for **S2.014, S2.015, and S2.016** shall be calculated using the following formula:

$$M = E * V$$

Where:

- M** = the mass of the pollutant emitted by the system in pounds per month,
- E** = the pollutant emission rate as determined in **Table V.C1-1** below in pounds per cubic foot of wood treated,
- V** = the monthly volume of wood treated in cubic feet using the specified preservative.

- j. Conduct and record an observation of visible emissions (excluding water vapor) on the wet scrubber exhaust stack for **S2.014, S2.015, and S2.016** on a **monthly** basis while operating. The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented to their back. If visible emissions are observed and exceed the applicable opacity standard, the Permittee shall take immediate corrective action. The Permittee shall maintain in a contemporaneous log the following recordkeeping: the calendar date of any required monitoring, name of the observer results of the monthly observation of visible emissions, and any corrective actions taken.
- k. Inspect the wet scrubber in accordance with the manufacturer’s operation and maintenance manual and record the results (e.g. the condition of the water spray nozzles), and any corrective actions taken.



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Section V. Specific Operating Conditions (continued)

C1. Emission Units S2.014, S2.015, and S2.016 (continued)

- 4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (Federally Enforceable SIP Requirement) (continued)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

Table V.C1-1
Wood Treating Cylinder Operations
Emission Factors for System 03A – Emission Units S2.014, S2.015, and S2.016
(pounds per cubic foot wood treated)
Table with 3 columns: Pollutant, Copper Napthenate Preservative, DCOI Preservative. Rows include VOC and Napthalene.

- 5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (Federally Enforceable SIP Requirement)
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
a. Testing shall be conducted on each individual horizontal wood treating cylinder during normal operations when only one of the horizontal wood treating cylinders is operating.
b. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on four valid runs. The first performance test run shall occur when the horizontal wood treating cylinder is steam heated under vacuum and residual moisture is removed from the wood. The second performance test run shall occur when preservative is pumped into the horizontal wood treating cylinder under pressure to saturate the wood. The third performance test run shall occur when the residual preservative is removed from the horizontal wood treating cylinder under vacuum. The fourth performance test run shall occur when the horizontal wood treating cylinder is operated under the crack and vac phase of the wood treatment process.
c. Testing shall be conducted on the exhaust stack of the control device that is operating at the time of testing.
d. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour. The HAP pollutant(s) to be analyzed shall include, at a minimum, naphthalene.
e. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity of the exhaust stack. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.



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Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

C2. Emission Unit PF1.004

System 03B – Treated Wood Drip Pad (Revised – Air Case 12130, February 2025)		Location UTM (Zone 11, NAD 83)	
		m North	m East
PF1.004	Treated Wood Drip Pad	4,362,509	308,980

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
Emissions from **PF1.004** has no add-on controls.

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. The maximum allowable volume of treated wood product for **PF1.004** is **320,000** cubic feet per month, nor more than **3,381,960** cubic feet per year.
 - b. The allowable chemical wood preservatives for **PF1.004** include:
 - (1) Copper Napthenate solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (2) DCOI (4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one) solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (3) Permittee shall no longer use Pentachlorophenol as a wood preservative.
 - c. Hours
 - (1) **PF1.004**, each, may operate a total of **24** hours per day.

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B.22017) (*Federally Enforceable SIP Requirement*)
The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **PF1.004** the following pollutants in excess of the following specified limits:
 - a. The discharge of **VOC** (volatile organic compounds) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - b. The discharge of any **individual HAP** (hazardous air pollutant) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - c. The discharge of **combined HAP** (hazardous air pollutants) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
 - d. The opacity from **PF1.004** shall not equal or exceed **20** percent.



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Section V. Specific Operating Conditions (continued)

C2. Emission Unit PF1.004 (continued)

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the volume of treated wood product for **PF1.004** on a monthly basis in cubic feet.
- b. Monitor and record the hours of operation for **PF1.004** on a daily basis.
- c. Monitor and record the wood preservative utilized in the treated wood for **PF1.004** on a per batch basis.
- d. Calculate and record the **VOC** emissions for **PF1.004** on a monthly basis in pounds.
- e. Calculate and record the **individual HAP** emissions for **PF1.004** on a monthly basis in pounds.
- f. Calculate and record the **combined HAP** emissions for **PF1.004** on a monthly basis in pounds.
- g. Monthly **VOC and HAP** emissions for **PF1.004** shall be calculated using the following formula:

$$M = E * V$$

Where:

M = the mass of the pollutant emitted by the system in pounds per month,

E = the pollutant emission rate as determined in **Table V.C-2** below in pounds per cubic foot of wood treated,

V = the monthly volume of treated wood in cubic feet using the specified preservative.

Table V.C2-2 Drip Pad Operations Emission Factors for System 03B – Emission Unit PF1.004 (pounds per cubic foot wood treated)		
Pollutant	Copper Napthenate Preservative	DCOI Preservative
VOC	9.895E-04	9.665E-04
Napthalene	1.229E-04	1.221E-04



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Section V. Specific Operating Conditions (continued)

D1. Emission Unit S2.006A

System 04A – Preservative Block Dissolving System (Pentachlorophenol Scenario) (Removed – Air Case 12130, February 2025)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.006A	4'W x 5'H x 16'L Preservative Dissolving Tank (2,394 Gallons) – Pentachlorophenol Operations	4,362,530	308,970



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Section V. Specific Operating Conditions (continued)

D2. Emission Unit S2.006B

System 04B – Preservative Block Dissolving System (DCOI Scenario)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.006B	4'W x 5'H x 16'L Preservative Dissolving Tank (2,394 Gallons) – DCOI Operations	4,362,530	308,970

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. **S2.006B** shall be located in the preservative dissolving building with a designated secondary containment area. Emissions from **S2.006B** shall exhaust into the preservative dissolving building. The preservative dissolving building shall be equipped with a carbon filtration system that absorbs volatile organic compounds that may be produced by **S2.006B**. Emissions from the carbon filtration system exhaust to the outside atmosphere.
 - b. Descriptive Stack Parameters
 Stack Height: 5 feet
 Stack Diameter: 8 feet
 Stack Temperature: ambient

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. The allowable chemical wood preservative for **S2.006B** includes:
 - (1) DCOI (4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one) solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - b. The maximum allowable loading rate when processing DCOI for **S2.006B** shall not exceed **1.62 tons of DCOI and 9,643.0 gallons of diesel blend** per any one batch process.
 - c. The maximum allowable number of batch processes when processing DCOI for **S2.006B** shall not exceed **40 batches** per calendar month.
 - d. **S2.006B** shall be designed to dissolve the allowable DCOI wood preservative by means of a heated liquid (**not to exceed 250 °F**) solution containing diesel that is applied by spray and/or agitation and/or circulation. The resulting solution will be transferred to a storage tank.
 - e. The carbon filtration system shall be maintained and operated according to manufacture specifications and procedures developed by Permittee.
 - f. Hours
 - (1) **S2.006B** may operate a total of **24 hours** per day.

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)

The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from the exhaust stack of the carbon filtration system that controls **S2.006B** the following pollutants in excess of the following specified limits:

 - a. The discharge of **VOC** (volatile organic compounds) to the atmosphere shall not exceed **4.68 pounds** per batch, nor more than **1.12 tons** per year.
 - b. The discharge of **HAP** (hazardous air pollutants) to the atmosphere shall not exceed **0.047 pounds** per batch, nor more than **0.011 tons** per year.
 - c. The opacity from the exhaust stack of the carbon filtration system that controls **S2.006B** shall not equal or exceed **20 percent** in accordance with NAC 445B.22017.



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Section V. Specific Operating Conditions (continued)

D2. Emission Unit S2.006B (continued)

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the loading rate of DCOI and diesel blend for **S2.006B** on a per batch basis.
- b. Monitor and record the number of DCOI dissolving batches conducted on a monthly basis.
- c. Monitor and record the hours of operation for **S2.006B** on a per batch basis.
- d. Monitor and record the maximum temperature (in °F) of the heated liquid solution on a per batch basis.
- e. Monitor and record the breakthrough indicator on the carbon filtration system on a weekly basis.
- f. Monitor and record the change-out of the carbon pellets when saturation of the carbon filtration system is reached.
- g. Monitor and record any maintenance that is conducted on the carbon filtration system.



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Section V. Specific Operating Conditions (continued)

E. Emission Units S2.007, S2.008, S2.009, S2.012, and S2.013

System 05 – Work Tanks (DCOI, CuNap Preservatives) (Revised – Air Case 12130, February 2025)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.007	75,202 Gallon Work Tank 3 (DCOI, Copper Napthenate Preservatives)	4,362,530	308,970
S2.008	29,857 Gallon Work Tank 1 (DCOI, Copper Napthenate Preservatives, previously IA1.022)	4,362,528	308,963
S2.009	27,216 Gallon Work Tank 2 (DCOI, Copper Napthenate Preservatives, previously IA1.023)	4,362,528	308,963
S2.010	12,720 Gallon Work Tank 4 (DCOI, Copper Napthenate Preservatives, previously IA1.003) (removed)	4,362,466	308,938
S2.011	12,720 Gallon Work Tank 5 (DCOI, Copper Napthenate Preservatives, previously IA1.004) (removed)	4,362,467	308,914
S2.012	35,533 Gallon Work Tank 6 (DCOI, Copper Napthenate Preservatives)	4,362,528	308,963
S2.013	35,533 Gallon Work Tank 7 (DCOI, Copper Napthenate Preservatives)	4,362,528	308,963

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. Emissions from **S2.007, S2.008, and S2.009** shall be ducted to a Jet-Vac JV-9617 Fume Scrubber.
 - b. Emissions from **S2.012, and S2.013** shall have no add-on controls and vent to the atmosphere.
 - c. Descriptive Tank Parameters
 Shell Diameter (ft): 50 (S2.007); 42 (S2.008, S2.009, S2.012, S2.013)
 Shell Height (ft): 16 (S2.007); 11 (S2.008); 10.5 (S2.009); 12 (S2.012, S2.013)

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
 - a. **S2.007, S2.008, S2.009, S2.012, and S2.013** shall only be used for the following chemical wood preservatives:
 - (1) Copper Napthenate solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (2) DCOI (4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one) solution. Permittee shall submit a request for approval to utilize a carrier fluid other than what has previously been approved within 30 days prior to use of an alternate carrier fluid. Request must submit MSDS(s) and emissions assessment for VOC/HAP of the alternate carrier fluid. BAPC may require a permit revision application to be submitted based on the assessment.
 - (3) Permittee shall no longer use Pentachlorophenol as a wood preservative.
 - b. The maximum allowable throughput rate for **S2.007, S2.008, S2.009, S2.012, and S2.013**, combined, shall not exceed **2,536,470.0** gallons per year for each allowable chemical wood preservative as listed in **E.2.a.** above.
 - c. Hours
S2.007, S2.008, S2.009, S2.012, and S2.013, each, may operate a total of **24** hours per day.



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Section V. Specific Operating Conditions (continued)

E. Emission Units S2.007, S2.008, S2.009, S2.012, and S2.013 (continued)

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B.22017) (*Federally Enforceable SIP Requirement*)

The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.007, S2.008, S2.009, S2.012, and S2.013, combined**, the following pollutants in excess of the following specified limits:

- a. The discharge of **VOC** (volatile organic compounds) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
- b. The discharge of any **individual HAP** (hazardous air pollutant) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
- c. The discharge of **combined HAP** (hazardous air pollutants) to the atmosphere shall not exceed the tons per year emission limitation established in **Section VI (Emission Caps)** of this operating permit.
- d. The opacity from **S2.007, S2.008, S2.009, S2.012, and S2.013**, each, shall not equal or exceed **20** percent.

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record.

- a. Monitor and record the combined throughput of each **chemical wood preservative**, in gallons, from **S2.007, S2.008, S2.009, S2.012, and S2.013**, on a monthly basis, as determined from the cubic feet of wood treated in System 03A (Section V.C1.a of this operating permit). The gallons of **chemical wood preservative** shall be determined using an annual average retention rate of:

0.75 gallons preservative/cubic feet of wood treated

- b. The annual average retention rate shall be verified on an annual basis for each **chemical wood preservative**.
- c. Monitor and record the total yearly combined throughput rate for all **chemical wood preservatives** in gallons per year based on cubic feet of wood treated in System 03A (Section V.C1.a. of this operating permit). The combined annual throughput shall be determined at the end of each month as the sum of the monthly throughput rates for the year for all previous months of that year.
- d. Calculate and record the **VOC** emissions for **S2.007, S2.008, S2.009, S2.012, and S2.013**, combined, on a monthly basis in pounds.
- e. Calculate and record the **individual HAP** emissions for **S2.007, S2.008, S2.009, S2.012, and S2.013**, combined, on a monthly basis in pounds.
- f. Calculate and record the **combined HAP** emissions for **S2.007, S2.008, S2.009, S2.012, and S2.013**, combined, on a monthly basis in pounds.
- g. Monthly **VOC and HAP** emissions shall be calculated using the following formula:

$$M = E * V$$

Where:

- M** = the mass of the pollutant emitted by the system in pounds per month,
- E** = the pollutant emission rate as determined in table **V.E-1** below in pounds per 1,000 gallons wood preservative,
- V** = the monthly volume of chemical wood preservative in gallons.



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Section V. Specific Operating Conditions (continued)

E. Emission Units S2.007, S2.008, S2.009, S2.012, and S2.013 (continued)

- 4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*) (continued)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

Table V.E-1 Work Tanks Operations Emission Factors for System 05 – Emission Units S2.007, S2.008, S2.009, S2.012, and S2.013 (pounds per 1,000 gallons chemical wood preservative)		
Pollutant	Copper Napthenate Preservative	DCOI Preservative
VOC	5.848E00	8.436E00
Napthalene	0.0444E-02	6.299E-02



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Section V. Specific Operating Conditions (continued)

F. Emission Unit S2.017

Table with 3 columns: System 06 - 600 HP Fulton Steam Boiler (Added - Air Case 12130, February 2025), Location UTM (Zone 11, NAD 83) m North, Location UTM (Zone 11, NAD 83) m East. Row 1: S2.017, 20.1 MMBtu/hr Natural Gas-Fired Steam Boiler, mfd by Fulton, mdl# FB-S-600, mfd 2024, 4,362,497, 308,939

- 1. Air Pollution Control Equipment (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.017 has no add-on controls.
b. Descriptive Stack Parameters
Stack Height: 27.0 feet
Stack Diameter: 2.2 feet
Stack Temperature: 350 °F
Exhaust Flow: 5,688 dry standard cubic feet per minute (dscfm)
2. Operating Parameters (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.017 may consume only natural gas.
b. The maximum allowable fuel consumption rate for S2.017 shall not exceed 19,705.9 standard cubic feet (scf) per any one-hour period.
c. Hours
(1) S2.017 may operate a total of 24 hours per day.
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (Federally Enforceable SIP Requirement)
The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from S2.017 the following pollutants in excess of the following limits:
a. The discharge of PM (particulate matter) to the atmosphere shall not exceed 0.15 pounds per hour, nor more than 0.66 tons per year.
b. The discharge of PM10 (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed 0.15 pounds per hour, nor more than 0.66 tons per year.
c. The discharge of PM2.5 (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed 0.15 pounds per hour, nor more than 0.66 tons per year.
d. The discharge of SO2 (sulfur dioxide) to the atmosphere shall not exceed 0.012 pounds per hour, nor more than 0.052 tons per year.
e. The discharge of NOx (oxides of nitrogen) to the atmosphere shall not exceed 1.97 pounds per hour, nor more than 8.63 tons per year.
f. The discharge of CO (carbon monoxide) to the atmosphere shall not exceed 1.66 pounds per hour, nor more than 7.25 tons per year.
g. The discharge of VOCs (volatile organic compounds) to the atmosphere shall not exceed 0.11 pounds per hour, nor more than 0.47 tons per year.
h. The opacity from S2.017 shall not equal or exceed 20 percent.
4. Monitoring and Recordkeeping (NAC 445B.346(2)) (Federally Enforceable SIP Requirement)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar dates of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the week, as appropriate.
a. Monitor and record the hours of operation for S2.017 on a weekly basis.
b. Monitor and record the consumption rate of natural gas on a weekly basis for S2.017, in standard cubic feet, by use of a fuel flow meter.
c. Record the average hourly fuel consumption rate of natural gas, in standard cubic feet per hour, by dividing the total weekly consumption rate by the total weekly hours of operation.



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Section V. Specific Operating Conditions (continued)

F. Emission Unit S2.017 (continued)

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
 - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
 - b. Testing shall be conducted on the exhaust stack (post controls).
 - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
 - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
 - a. Reporting and Recordkeeping Requirements (40 CFR Part 60.48c)
 - (1) The Permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include: (40 CFR Part 60.48c(a))
 - (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. (40 CFR 60.48c(a)(1))
 - (b) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. (40 CFR 60.48c(a)(3))
 - (2) Except as provided under 40 CFR 60.48(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. (40 CFR Part 60.48c(g))
 - (a) As an alternative to meeting the requirements of 40 CFR Part 60.48c (g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. (40 CFR 60.48c(g)(2))
 - (b) As an alternative to meeting the requirements of 40 CFR 60.48c (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. (40 CFR Part 60.48c(g)(3))
 - (3) All records required under 40 CFR Part 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. (40 CFR Part 60.48c(i))
 - (4) The reporting period for the reports required under 40 CFR Part 60, Subpart Dc, is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. (40 CFR Part 60.48c(j))

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



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CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section VI. Emission Caps

A. Cap for Emission Units S2.007, S2.008, S2.009, S2.012, S2.013, S2.014, S2.015, and S2.016

1. Emission Limits (NAC 445B.070) (*Federally Enforceable SIP Requirement*)

On and after the date of startup of the facility, Permittee shall not discharge or cause the discharge into the atmosphere from the facility emissions in excess of the following specified limits:

- a. The discharge of combined **VOC (volatile organic compounds)** to the atmosphere shall not exceed **24.50 tons per calendar year**.
- b. The discharge of combined **individual HAP (hazardous air pollutants)** to the atmosphere shall not exceed **2.00 tons per calendar year**.
- c. The discharge of combined total **HAP (hazardous air pollutants)** to the atmosphere shall not exceed **5.00 tons per calendar year**.

2. Monitoring, Recordkeeping, Reporting and Compliance (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

a. In addition to the monitoring, testing, and reporting requirements established in **Section V.C1, V.C2, and Section V.E** of this operating permit, Permittee will record the **combined VOC, combined individual HAP and combined total HAP emissions for S2.007, S2.008, S2.009, S2.012, S2.013, S2.014, S2.015, and S2.016 on a yearly basis**.

- (1) The required monitoring and recording established in **A.2.a** of this section will be maintained in a contemporaneous log containing at a minimum the following recordkeeping:
 - (a) The calendar date of any required monitoring.
 - (b) The combined total monthly and yearly **VOC** emissions, in tons, for **S2.007, S2.008, S2.009, S2.012, S2.013, S2.014, S2.015, and S2.016**. The combined total **VOC** emissions will be determined from the monitoring and recordkeeping requirements established in **V.C1.4.f, V.C2.4.d, and V.E.4.d** of this operating permit.
 - (c) The combined total monthly and yearly **individual HAP** emissions, in tons, for **S2.007, S2.008, S2.009, S2.012, S2.013, S2.014, S2.015, and S2.016**. The combined **individual HAP** emissions will be determined from the monitoring and recordkeeping requirements established in **V.C1.4.g, V.C2.4.e, and V.E.4.e** of this operating permit.
 - (d) The combined total monthly and yearly **HAP** emissions, in tons, for **S2.007, S2.008, S2.009, S2.012, S2.013, S2.014, S2.015, and S2.016**. The combined total **HAP** emissions will be determined from the monitoring and recordkeeping requirements established in **V.C1.4.h, V.C2.4.f, and V.E.4.f** of this operating permit.

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



Bureau of Air Pollution Control

Facility ID No. A0499

Draft Permit No. AP2491-0095.06

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section VII. Surface Area Disturbance Conditions

The surface area disturbance for **Silver Springs Wood Treatment Facility** is **83** acres.

A. Fugitive Dust (NAC 445B.22037) (*Federally Enforceable SIP Requirement*)

1. No person may 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, no person may 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 otherwise provided in subsection 4, no person may disturb or cover 5 acres or more of land or its topsoil until he has obtained an operating permit 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. Schedules of Compliance

- A. On or before **June 30, 2025**, Permittee shall conduct the following performance and compliance testing for the listed emission units (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
1. **S2.002 (System 02) – Hurst Natural Gas-Fired Tube Boiler (Site 1 or Site 2)**
 - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
 - b. Testing shall be conducted on the exhaust stack (post controls).
 - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
 - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
 2. **S2.014, S2.015, and S2.016 (System 03A) – Horizontal Wood Treating Cylinders – DCOI Preservative Scenario**
 - a. Testing shall be conducted on **each** individual horizontal wood treating cylinder during normal operations when only one of the horizontal wood treating cylinders is operating.
 - b. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on **four valid runs**. The **first performance test run** shall occur when the horizontal wood treating cylinder is steam heated under vacuum and residual moisture is removed from the wood. The **second performance test run** shall occur when preservative is pumped into the horizontal wood treating cylinder under pressure to saturate the wood. The **third performance test run** shall occur when the residual preservative is removed from the horizontal wood treating cylinder under vacuum. The **fourth performance test run** shall occur when the horizontal wood treating cylinder is operated under the crack and vac phase of the wood treatment process.
 - c. Testing shall be conducted on the exhaust stack of the control device that is operating at the time of testing.
 - d. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour. The HAP pollutant(s) to be analyzed shall include, at a minimum, naphthalene.
 - e. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity of the exhaust stack. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - f. **The opacity compliance demonstrations and/or performance tests required for S2.014, S2.015, and S2.016 in A.2 of this section shall satisfy the requirements of Section IV.A of this operating permit.**



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CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section VIII. Schedules of Compliance (continued)

- A. On or before **June 30, 2025**, Permittee shall conduct the following performance and compliance testing for the listed emission units. (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*) (continued)
3. **S2.017 (System 06) – Fulton Natural Gas Fired Steam Boiler**
- a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
 - b. Testing shall be conducted on the exhaust stack (post controls).
 - c. Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
 - d. Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM₁₀ and PM_{2.5} emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
 - e. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM_{2.5} for determination of compliance.
 - f. Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
 - g. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
 - h. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - i. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
 - j. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.
 - k. **The opacity compliance demonstrations and/or performance tests required for S2.017 in A.3 of this section shall satisfy the requirements of Section IV.A of this operating permit.**



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CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section VIII. Schedules of Compliance (continued)

- B. The Permittee shall conduct the following performance and compliance testing for the listed emission units. (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)
1. **S2.014, S2.015, and S2.016 (System 03A) – Horizontal Wood Treating Cylinders – Cu Nap Preservative Scenario**
 - a. The Permittee shall give notice to the Director 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to have an observer present. A written testing procedure must be submitted to the Director at least 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to review the proposed testing procedures. (NAC 445B.252(4) and 40 CFR Part 60.7(a)(6))
 - b. Testing shall be conducted on **each** individual horizontal wood treating cylinder during normal operations when only one of the horizontal wood treating cylinders is operating.
 - c. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on **four valid runs**. The **first performance test run** shall occur when the horizontal wood treating cylinder is steam heated under vacuum and residual moisture is removed from the wood. The **second performance test run** shall occur when preservative is pumped into the horizontal wood treating cylinder under pressure to saturate the wood. The **third performance test run** shall occur when the residual preservative is removed from the horizontal wood treating cylinder under vacuum. The **fourth performance test run** shall occur when the horizontal wood treating cylinder is operated under the crack and vac phase of the wood treatment process.
 - d. Testing shall be conducted on the exhaust stack of the control device that is operating at the time of testing.
 - e. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour. The HAP pollutant(s) to be analyzed shall include, at a minimum, naphthalene.
 - f. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity of the exhaust stack. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
 - g. **The opacity compliance demonstrations and/or performance tests required for S2.014, S2.015, and S2.016 in B.1 of this section shall satisfy the requirements of Section IV.A of this operating permit.**

*****End of Schedule of Compliance*****



Bureau of Air Pollution Control

Facility ID No. A0499

Draft Permit No. AP2491-0095.06

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: STELLA-JONES CORPORATION – SILVER SPRINGS WOOD TREATMENT FACILITY (AS PERMITTEE)

Section IX. Amendments

Month Day, 2025 (Air Case # 12130)

- System 02 - Add second UTM location for Hurst Boiler (S2.002)
- System 03A – Replace S2.003 with S2.016, replace S2.004 with S2.014, replace S2.005 with S2.015. Remove PCP preservative. Revise VOC/HAP emissions. Remove pre-scrubber testing requirements.
- System 03B – Revise VOC/HAP emissions. Remove PCP preservative.
- System 04A – Remove PCP preservative from Mix Tank.
- System 05 – Remove tanks S2.010 and S2.011. Remove PCP preservative. Revise VOC/HAP emissions.
- System 03A+03B+05 VOC/HAP Cap does not change.
- System 06 – Add new Fulton steam boiler (S2.017).
- Remove PCP preservative from IA1.026 and IA1.031 mix tanks. Remove IA1.041 co-solvent tank.
- Add Section VIII Schedules of Compliance for System 02, System 03A, and System 06.

This permit:

1. **Is non-transferable. (NAC 445B.287.3) (Federally Enforceable SIP Requirement)**
2. **Will be posted conspicuously at or near the stationary source. (NAC 445B.318.5) (Federally Enforceable SIP Requirement)**
3. **Will expire and be subject to renewal five (5) years from: September 20, 2024 . (NAC 445B.315) (Federally Enforceable SIP Requirement)**
4. **A completed application for renewal of an operating permit must be submitted to the Director on the form provided by him with the appropriate fee at least 70 calendar days before the expiration date of this operating permit. (NAC 445B.3473.2) (Federally Enforceable SIP Requirement)**
5. **Any person aggrieved by a final decision of the Department may, not later than 10 days after notice of the action of the Department, appeal the decision by filing a request for a hearing before the Commission on a form 3* with the State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701-5249. *(See adopting agency for form.) (NAC 445B.890) (State Only Requirement)**

THIS PERMIT EXPIRES ON: September 20, 2029

Signature: _____

Issued by: XXXXXXXXXXXX
Supervisor, Permitting Branch
Bureau of Air Pollution Control

Phone: (775) 687- XXXX **Date:** TBD

Class II Insignificant Activities List
Appended to Permit #AP2491-0095.06

Emission Unit #	Emission Unit Description
IA1.001	9,392 Gallon Water Evaporation Tank (Replaced by IA1.043 - Air Case 11749, August 2023)
IA1.002	[Reserved]
IA1.003	[Reserved]
IA1.004	[Reserved]
IA1.005	12,190 Gallon Backwash Tank #11
IA1.006	25,350 Gallon Settling Tank #9
IA1.007	[Reserved]
IA1.008	[Reserved]
IA1.009	25,350 Gallon Settling Tank #12
IA1.010	10,152 Gallon Settling Tank #7
IA1.011	10,152 Gallon Settling Tank #1
IA1.012	10,152 Gallon Settling Tank #2
IA1.013	[Reserved]
IA1.014	[Reserved]
IA1.015	[Reserved]
IA1.016	10,152 Gallon Settling Tank #3
IA1.017	19,860 Gallon Settling Tank #4
IA1.018	29,790 Gallon Settling Tank #5
IA1.019	[Reserved]
IA1.020	6,016 Gallon Boiler Blowdown Tank #8
IA1.021	[Reserved]
IA1.022 (re-classify)	Permit as S2.008, System 05 (29,857 Gallon Work Tank #1)
IA1.023 (re-classify)	Permit as S2.009, System 05 (27,216 Gallon Work Tank #2)
IA1.024	6,392 Gallon Settling Tank #14
IA1.025	[Reserved]
IA1.026	25,310 Gallon Mix Tank #2 (DCOI, CuNap Preservatives)
IA1.027	25,530 Gallon Diesel Storage Tank #2
IA1.028	19,440 Gallon Diesel Storage Tank #1
IA1.029	25,350 Gallon Settling Tank #6
IA1.030	[Reserved]
IA1.031	13,902 Gallon Mix Tank #1 (DCOI, CuNap Preservatives)
IA1.032	19,958 Gallon Co-Solvent Tank #1
IA1.033	13,520 Gallon Semi-Concentrate Tank #1
IA1.034	[Reserved]
IA1.035	[Reserved]
IA1.036	[Reserved]
IA1.037	1.6 MMBtu/hr Natural Gas Fired Style Wood Drying Kiln with four 0.4 MMBtu/hr Burners
IA1.038	Evapco Model AT 8-92 Cooling Tower (replaced by IA1.042)
IA1.039	10,904 Gallon Settling Tank #13
IA1.040 (removed)	Vacuum Pump #1 Water (1,736 gallons) – Removed (No VOC/HAPs)
IA1.041	9,024 Gallon Co-Solvent Tank #2 - Removed
IA1.042	Marley NC8401 2-Cell Cooling Tower (Replaces IA1.038)
IA1.043	9,600 Gallon Water Evaporation Tank (Replaced IA1.001 - Air Case 11749, August 2023)