

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION – BUREAU OF AIR POLLUTION CONTROL

Director’s Review and Preliminary Determination of Permit Issuance for

**Redwood Materials, Inc.
Carson City County, Nevada
November 20, 2023**

Redwood Materials, Inc. (Redwood) submitted an application for a revised Class II Air Quality Operating Permit, AP3499-4249, FIN A2238, for the Redwood facility in Carson City County, Nevada. The project is located northeast Carson City, in all or portions of Section 33, Township 16N, Range 20E, M.D.B.&M.

Redwood Materials, Inc. is a production facility that reprocesses various grades of lithium-ion batteries into metal material commodities. In addition to updating emission limits for Systems 01a, 01b, 02a and 02c, revisions include adding Systems 05 through 07 and removing Systems 02b, 03 and 04.

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

	<i>Redwood Materials, Inc. Potential to Emit (PTE)</i>			
	Pollutant		Revision Net Change (tons/year)	Facility-Wide (tons/year)
	Current emissions estimates indicate Redwood is a <i>Class II source</i> , because the facility-wide PTE for any individual regulated pollutant is <i>less</i> than 100 tons per year.	PM	Particulate Matter	-1.52
PM₁₀		Particulate Matter ≤ 10 microns in diameter	-1.52	3.92
PM_{2.5}		Particulate Matter ≤ 2.5 microns in diameter	-1.52	3.92
SO₂		Sulfur Dioxide	0.05	6.63
NO_x		Oxides of Nitrogen	2.07	16.77
CO		Carbon Monoxide	28.75	99.42
VOC		Volatile Organic Compounds	25.65	80.61
Pb		Lead	-	0.066
HAPs (all)		Hazardous Air Pollutants	0.74	17.76

The project is located in Air Quality Hydrographic Area (HA) 104 of the Eagle Valley. HA 104 is not a triggered basin for an increment analysis. Redwood is not subject to any federal regulations.

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

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