

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

**Iron Horse Nevada, LLC
Transload Facility
Humboldt County, Nevada
October 3, 2025**

Iron Horse Nevada, LLC (Iron Horse) submitted an application for a new Class II Air Quality Operating Permit, AP4789-4701, FIN A2591, for the Transload Facility in Humboldt County, Nevada. The project is accessed by taking exit 173 to NV-289/W. Winnemucca Blvd, turning left, then turning right onto W. Rose Creek Rd and traveling 1.4 miles. Turn left onto Airport Rd and, in less than one mile, turn right onto the facility access road. The project is located in all or portions of Sections 16 and 17, Township 35N, Range 37E, M.D.B.&M.

The transload Facility will include sulfur storage and transload system, which is supported by steam generating boilers. The facility will also include a mobile dry reagent transfer system and a mobile liquid transfer system to offload reagents and fuel either from railcars to over-the-road tanker trucks or, in some cases, transfer reagents from trucks to railcars as described below. Critical equipment will be powered by an emergency generator in the event of power loss.

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

Current emissions estimates indicate Iron Horse is a <i>Class II source</i> , because the facility-wide PTE for any individual regulated pollutant is less than 100 tons per year.	<i>Iron Horse Transload Facility Potential to Emit (PTE)</i>			
	Pollutant		New (tons/year)	Facility-Wide (tons/year)
	PM	Particulate Matter	2.55	2.55
	PM₁₀	Particulate Matter ≤ 10 microns in diameter	2.40	2.40
	PM_{2.5}	Particulate Matter ≤ 2.5 microns in diameter	2.34	2.34
	SO₂	Sulfur Dioxide	6.87	6.87
	NO_x	Oxides of Nitrogen	25.3	25.3
	CO	Carbon Monoxide	14.9	14.9
	VOC	Volatile Organic Compounds	1.64	1.64
	Pb	Lead	0.00	0.00
	HAP (HCl)	Hazardous Air Pollutants	0.25	0.25
	HAPs (all)	Hazardous Air Pollutants	0.37	0.37

The project is located in Air Quality Hydrographic Area (HA) 70 of the Winnemucca Segment. HA 70 is not a triggered basin for an increment analysis. Iron Horse will be subject to NESHAP – 40 CFR Part 63 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and NESHAP – 40 CFR Part 63 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

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 Iron Horse, will not violate any air quality standard.

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