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
November 25, 2026

Iron Horse Nevada, LLC (Iron Horse) submitted an application for a revised 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.

This revision adds multi-fuel capability to the boilers, a lime silo, and a fire pump engine; modifies certain stack parameters; and updates the UTM coordinates of currently permitted units.

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.

	Iron Horse Transload Facility Potential to Emit (PTE)			
	Pollutant		**Revision Net Change (tons/year)**	**Facility-Wide (tons/year)**
Current emissions estimates indicate Iron Horse is a *Class II source*, because the facility-wide PTE for any individual regulated pollutant is *less* than 100 tons per year.	**PM**	Particulate Matter	1.00	3.55
	PM_{10}	Particulate Matter ≤ 10 microns in diameter	0.79	3.20
	$PM_{2.5}$	Particulate Matter ≤ 2.5 microns in diameter	0.64	2.98
	SO_2	Sulfur Dioxide	-2.91	3.97
	NO_x	Oxides of Nitrogen	0.70	26.0
	CO	Carbon Monoxide	7.13	22.0
	VOC	Volatile Organic Compounds	-0.11	1.53
	H_2S	Hydrogen Sulfide	0.00	1.47
	HAP (single)	Hazardous Air Pollutants	0.00	0.25
	HAPs (all)	Hazardous Air Pollutants	0.16	0.74

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 anlaysis. Iron Horse will be subject to NSPS – 40 CFR Part 60 Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, NESHAP – 40 CFR Part 63 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, NESHAP – 40 CFR Part 63 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, and NESHAP – 40 CFR Part 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating 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.