

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

Director's Review and Preliminary Determination of Permit Issuance for

**Comstock Metals Corporation
Solar Panel Recycling Facility
Lyon County, Nevada
December 1, 2025**

Comstock Metals Corporation (Comstock) submitted an application for a revised Class II Air Quality Operating Permit, AP5093-4573, FIN A2502, for the Solar Panel Recycling facility in Lyon County, Nevada. The project is located at 600 Lake Avenue in Silver Springs, NV, in all or portions of Section 24, Township 18N, Range 24E, M.D.B.&M.

The facility recycles solar panels. This revision will add controls, revise emissions, and revise throughputs for existing systems 1 and 2. This revision will also add Systems 3 through 8.

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 Comstock 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.	<i>Comstock Potential to Emit (PTE)</i>			
	Pollutant		Revision Net Change (tons/year)	Facility-Wide (tons/year)
	PM	Particulate Matter	-3.24	2.98
	PM ₁₀	Particulate Matter ≤ 10 microns in diameter	-3.24	2.98
	PM _{2.5}	Particulate Matter ≤ 2.5 microns in diameter	-3.24	2.98
	SO ₂	Sulfur Dioxide	1.07	1.14
	NO _x	Oxides of Nitrogen	11.5	12.2
	CO	Carbon Monoxide	3.73	4.14
	VOC	Volatile Organic Compounds	4.08	4.14
	Pb	Lead	.04	0.037
	HAP (all)	Hazardous Air Pollutants	-.03	0.04

The project is located in Air Quality Hydrographic Area (HA) 102 of the Churchill Valley. HA 102 is designated as PSD and is triggered for NO₂.

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 Comstock, will not violate any air quality standard.

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