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PART 70 OPERATING PERMIT TECHNICAL SUPPORT DOCUMENT (STATEMENT of BASIS)

**APPLICATION FOR:
Administrative Revision**

**SUBMITTED BY:
99th Civil Engineering Squadron**

**FOR:
NTTR**

**SOURCE:
18210**

**LOCATION:
East Highway 95 North
Indian Springs, Nevada 89018**

**SIC code 9711, "National Security"
NAICS code 928110, "National Security"**

Application Received: August 27, 20224

TSD Date: August 27, 2024

EXECUTIVE SUMMARY

NTTR (Nellis Test and Training Range) is a military training facility in Nevada. The southern ranges of NTTR are adjacent to the township of Indian Springs, Nevada and south of the Creech Air Force Base (AFB). NTTR comprises hydrographic areas 160, 161, 168, 211, and portions of 212 and encompasses approximately 2.9 million acres of land that is administered by the Bureau of Land Management for military use as an armament and high hazard testing area. NTTR and Creech AFB collectively comprises a single major source for purposes of NSR applicability. DAQ issues multiple Part 70 OPs to a single major source for administrative purposes and to facilitate compliance demonstration.

The hydrographic areas contained in the NTTR are all designated as in attainment for all pollutants except for HA 212 (the Las Vegas Valley). HA 212 is designated as in attainment for all pollutants except ozone. It was designated a moderate nonattainment area for ozone on January 5, 2023. The designation has not imposed any new requirements at this time. The source is not a categorical source as defined in AQR 12.2.2(j).

The source consists of screens, crushers, conveyors, stockpiles, unpaved haul roads, diesel engines, and a fire pump. The source also has an abrasive blasting system and a variety of above ground storage tanks that are designated as insignificant activities.

NTTR operations on the main base are under the authority of the 99th Air Base Wing Commander, located at Nellis Air Force Base. The source falls under SIC code 9711, National Security and NAICS code 928110 National Security.

NTTR individually is a synthetic minor source of NO_x and minor source of PM₁₀, PM_{2.5}, CO, SO₂, VOC, and HAP. NTTR is also a source of greenhouse gas (GHG) pollutants. The table below summarizes the source potential to emit (PTE), by category, for each regulated air pollutant for all emission units addressed by this Part 70 Operating Permit (Part 70 OP).

Table 1: NTTR Potential to Emit

Pollutants	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	H ₂ S	Pb	GHG ¹
Internal Combustion Units	6.34	6.34	94.34	20.07	0.09	8.31	0.13	0	0	12,038.67
Mineral Processing	9.81	1.54	0	0	0	0	0	0	0	0
Total	16.12	7.88	94.34	20.07	0.09	8.31	0.13	0	0	12,728.55

¹ A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.

² Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants.

Table 2 summarizes the source PTE for each regulated air pollutant for the combined emission units for both NTTR and Creech AFB covered by their respective Part 70 OPs when considering a single major stationary source.

Table 2: Source-wide PTE for NTTR and Creech AFB Combined Operations (tpy)

Pollutants	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	Pb	GHG
NTTR	16.12	7.88	94.34	20.07	0.09	8.31	0.13	0	12,728.55
Creech AFB	4.05	4.05	113.36	29.15	0.86	28.69	9.37	0	25,517.12
Total	20.17	11.93	207.70	49.22	0.95	37.00	9.50	0	38,245.67

DAQ will continue to require the permittees to estimate their GHG PTE in terms of each individual pollutant (CO₂, CH₄, N₂O, SF₆, etc.) during subsequent permitting actions, and the corresponding TSDs will include these PTEs for informational purposes.

The current permitting action is an initial Part 70 OP for NTTR. Pursuant to AQR 12.5.2, all terms, conditions, and the attachments are federally enforceable unless explicitly denoted otherwise.

NTTR is subject to 40 CFR Part 60, Subpart OOO; 40 CFR Part 60, Subpart IIII; and 40 CFR Part 63, Subpart ZZZZ.

TABLE OF CONTENTS

I.	ACRONYMS	5
II.	SOURCE DESCRIPTION	6
	A. Description of Source	6
	B. Current Permitting Action.....	6

LIST OF TABLES

Table I-1: List of Acronyms	5
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I. ACRONYMS

Table I-1: List of Acronyms

AQR	Clark County Air Quality Regulation
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
DES	Clark County Department of Environment and Sustainability
GHG	greenhouse gas
HA	Hydrographic Area
HAP	hazardous air pollutant
NAICS	North American Industry Classification System
NO _x	nitrogen oxide(s)
NOV	Notice of Violation
PM _{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
PM ₁₀	particulate matter less than 10 microns in aerodynamic diameter
PTE	potential to emit
SIC	Standard Industrial Classification

II. SOURCE DESCRIPTION

A. DESCRIPTION OF SOURCE

NTTR provides realistic tactics simulations for the U.S. Air Force (USAF) Warfare Center of Air Combat Command to improve combat readiness in support of United States national interests. NTTR consists of the flight line and an associated industrial infrastructure that directly supports flying operations, along with a wide variety of commercial and industrial uses. The source is not a categorical source as defined in AQR 12.2.2(j)

B. CURRENT PERMITTING ACTION

The source notified DES by email on August 27, 2024, that the Title V Operating Permit was issued with the incorrect responsible official (RO) listed. NTTR submitted a Declaration of Responsible Official to DES on August 12, 2024, to update the RO to Colonel Jason J. Glynn. This administrative revision will update the Part 70 OP to list Colonel Glynn as the RO.