

EXHIBIT 6

TECHNICAL REVIEW

(Air Quality Permit)

TECHNICAL REVIEW

AND DETERMINATION OF CONTINUED COMPLIANCE
FOR:

MEDIWASTE DISPOSAL LLC

Nye County, Nevada
HA 162 – Pahrump Basin

Class II Air Quality Operating Permit

AP4953-4771

FIN A2651

Air Case 12444 – New



BY

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

RANDY PHILLIPS
STAFF ENGINEER
MARCH 2026



1.0 INTRODUCTION

On April 24, 2025, MediWaste Disposal LLC (MediWaste) submitted an application for a new Class II Air Quality Operating Permit (AQOP) to the Nevada Division of Environmental Protection – Bureau of Air Pollution Control (BAPC). The Class II AQOP application was deemed administratively complete on May 8, 2025.

Request for Information (RFI) #1, sent July 1, 2025, asked for the following:

- *Does each pyrolysis unit have its own exhaust stack or do the 7 pyrolysis units share a common exhaust stack?*
- *Do the emissions from the 2.0 MMBtu/hr pyrolysis burner vent to the same exhaust stack as the 2.0 MMBtu/hr thermal oxidizer?*
- *The manufacture spec sheet in the application indicates that each pyrolysis oven can process up to 4,000 lbs of medical waste per batch. Does the 4,000 lbs include the weight of the packaging and pallet(s)?*
- *The manufacture spec sheet in the application indicates that a batch may take 6 to 12 hours to process. Does MediWaste only plan to process 1 batch/day/pyrolysis unit?*
- *In Table C-1 of the application there is a max annual facility throughput of 15,330 tons/year. Does the 15,330 tons/year include packaging and pallets or just medical waste? For 7 pyrolysis units, 15,330 ton/year for the facility would equate out to 2,190 tons/year/pyrolysis unit. Is MediWaste OK with a limit of 2,190 tons/year/each pyrolysis unit? Or does MediWaste prefer to have a combined limit?*
- *The 4 types of medical waste are defined in the application as black bins, red bins, yellow bins, and blue bins. Will MediWaste dedicate each pyrolysis unit to a specific type of waste or will each pyrolysis unit be able to process any type of medical waste?*
- *Could you send me performance test data from the like-kind medical waste facility and the safety factor(s) used to estimate emissions for the pyrolysis units?*
- *The manufacture spec sheet in the application lists that the thermal oxidizer is rated for 10,000 cfm operation. The combustion equipment application forms for the pyrolysis units list 3,283 acfm and 2,126 dscfm for the exhaust stack. Can you check on the volume flow rates? I need an accurate flow rate for modeling.*

Complete responses were received July 17, 2025 and July 23, 2025. This resulted in 23 stop days.

Request for Information (RFI) #2, sent July 28, 2025, asked for the following:

- *In the application emission calculations for ash transfer:*
 - (1) *Below Table C-2 is the “k” values you used for the AP42 Section 13.2.4, page 13.2.4-4 equation 1. I am OK with the 0.74 multiplier for PM. Where does the 0.05034 (PM10) and 0.01259 (PM2.5) values come from? AP42 lists 0.35 (PM10) and 0.053 (PM2.5) for k values.*
 - (2) *BAPC is OK with the 7.76 mph wind speed and the moisture content of 2.5%. There will be a required moisture analysis of the ash (conducted daily/weekly/per batch) to make sure the moisture is 2.5% and reflects the emissions that were calculated.*
 - (3) *BAPC policy only allows for a 50% control for an enclosure and not the 70% that was used in the AP42 equation 1 emission calcs. You will need to update the calcs using 50%.*
- *How are emissions controlled from the point of the loader transfer of ash from the bottom of the pyrolysis unit up to (but not including) the dumpster. Can swirling or strong winds blow ash out of the loader bucket during the ash transfer? There may need to be a permit condition that prevents ash handling/transfers during windy conditions (say greater than 20 mph).*

Complete responses were received August 4, 2025. This resulted in 8 stop days.



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Request for Information (RFI) #3, sent September 3, 2025, asked for the following:

- *BAQP Modeling Group sent the MediWaste Modeling files to MediWaste due to exceedances of PM_{2.5} and SO₂ NAAQS.*

Complete responses were received September 10, 2025. This resulted in 8 stop days.

A draft permit was sent to MediWaste on November 19, 2025, for facility review. MediWaste comments on the draft permit were received on December 1, 2025. This resulted in 13 stop days. BAPC responded to the MediWaste comments on December 22, 2025. No changes were made to the original draft permit. On January 5, 2026, MediWaste responded to BAPC's comments with "proceed to permit issuance". This resulted in 15 stop days.

Total stop days prior to public notice was 67 days.

Public notice was required because the proposed MediWaste Facility will be a new Class II source (NAC 445B.3457.5(a)). Public notice started on February 2, 2026 and ended on March 4, 2026. No comments were received.

The Standard Industrial Classification (SIC) code for the process is 4953. This code is reserved for refuse systems industry.



2.0 DESCRIPTION OF FACILITY AND PROCESS

2.1 FACILITY DESCRIPTION

MediWaste Disposal LLC (MediWaste) is proposing to construct a new medical waste pyrolysis facility to be located at 1850 E. Basin Avenue, Pahrump, Nevada (Nye County). The MediWaste Facility will consist of seven (7) pyrolysis systems and the associated seven (7) thermal oxidizers. An ash handling system will also be part of the facility.

2.2 PROPOSED PERMIT ACTIONS

The proposed permit action for the MediWaste Facility shall be to issue a new Class II Air Quality Operating Permit for the purpose of thermally destroying medical waste by the process of pyrolysis. Pyrolysis is an endothermic process that does not require air oxygen and is exempt from federal air regulations for incinerators (40 CFR 60 Subparts A, Ce, Ec, CCCC, DDDD, EEEE, and FFFF).

2.3 PROCESS NARRATIVE

The MediWaste Facility will be located at 1850 E. Basin Avenue, Pahrump, Nevada (Nye County). The proposed operations will be located in Hydrographic Area 162, also referred to as Basin HA162 or Pahrump Basin. This area is currently designated as unclassifiable and/or attainment for all criteria pollutants.

Medical waste is defined as cytotoxic drug and chemical waste (black bins); soiled waste such as infected dressings, POP casts (red bins); anatomical was such as placenta, pathological waste and body parts (yellow bins); infected plastics such as syringes, gloves, plastic waste (blue bins). MediWaste shall receive the containers, will not open or manipulate the containers in any way, and places them directly into the pyrolysis units for thermal destruction as received.

2.3.1 Medical Waste Pyrolysis Units (Systems 1 through 7, Emission Units S2.001 through S2.007 and S2.001A through S2.007A)

The seven (7) pyrolysis systems are stand-alone units, manufactured by Vulcan Systems. Each pyrolysis system consists of a pyrolysis chamber, plasma chamber and thermal oxidizer. Each pyrolysis chamber is externally heated by four (4) natural gas fired burners, each rated at 0.5 MMBtu/hr. Each thermal oxidizer is rated at 2.0 MMBtu/hr. The medical waste will be loaded into a pyrolysis system (including packaging and pallets) and operated as a batch process. Once the medical waste is loaded into the system, the door is closed and sealed, and the thermal destruction process begins. Each system is monitored by the process logic control (PLC) and an operator.

There are three separate unit operations for each system to ensure pyrolysis of the medical waste, packaging, pallets, and wrapping. The first unit operation is carried out in the primary pyrolytic chamber in which the waste is heated with an external heat source (4 natural gas fired burners) to the point where molecular torsion and cracking takes place. The materials are generally heated for a period of time based on water content, but generally six (6) to twelve (12) hours at high temperature. This heat induced torsion breaks large molecules down to smaller volatile fragments (vapors). This process repeats itself until all the paper, plastic, and all other components of the waste are converted to vapors. The vapors are then received by the second stage - where a plasma forms. Under similar conditions as the pyrolytic chamber, this section of the system takes the VOCs and further reduce them in size through a free radical process as well as traditional torsional and vibrational strain. Following this point in the process, the third stage of the operation is when excess air is quantitatively introduced to begin the oxidation process that utilizes a thermal oxidizer, converting the VOCs to mostly carbon dioxide and water vapor. The exhaust gases



are emitted to the atmosphere through a stack. Stack emissions consist of the combustion emissions of natural gas from the burners and thermal oxidizer and the emissions associated with the thermal destruction of medical waste and associated packaging material.

Emissions from the pyrolysis units for Systems 1 through 8 were estimated using performance testing results from "like-kind" pyrolysis units. 2016, 2019, and 2023 testing data for the "like-kind" pyrolysis units was reviewed. A safety factor was added to the test data to determine emission factors.

Initial opacity compliance demonstrations and initial performance testing will be required on 4 of the 7 pyrolysis units with each pyrolysis unit testing a different medical waste type. Once the 4 pyrolysis units that are tested and show compliance with the requested emission limits, the remaining 3 pyrolysis units may operate and be tested with the 3 of the 4 most common medical waste types. The testing shall include:

- Testing shall be conducted on the exhaust stack (post controls).
- Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
- Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM₁₀ and PM_{2.5} emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
- The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM_{2.5} for determination of compliance.
- Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
- Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
- Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
- Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
- Reference Method 23 test in Appendix A of 40 CFR Part 60 shall be used to determine the dioxin and furan emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
- Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.
- Reference Method 29 test in Appendix A of 40 CFR Part 60 to determine the antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium emissions. The minimum sample volume must be 2.0 dscm (70 dscf) for each run.



Annual performance testing on 4 of the 7 pyrolysis units with each pyrolysis unit testing a different medical waste type, within 90 days of the anniversary date of the previous initial performance testing or annual performance testing, and annually thereafter, in accordance with the following:

- The annual performance testing shall rotate the 7 pyrolysis units so that the group of 4 tested pyrolysis units are not the same units tested in consecutive years.
- Testing shall be conducted on the exhaust stack (post controls).
- Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
- Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM₁₀ and PM_{2.5} emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
- The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM_{2.5} for determination of compliance.
- Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
- Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
- Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
- Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
- Reference Method 23 test in Appendix A of 40 CFR Part 60 shall be used to determine the dioxin and furan emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
- Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.
- Reference Method 29 test in Appendix A of 40 CFR Part 60 to determine the antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium emissions. The minimum sample volume must be 2.0 dscm (70 dscf) for each run.

2.3.2 Hydrated Ash Material Transfers (System 8, Emission Units PF1.001 through PF1.007)

The pyrolysis process generates a small amount of hydrated ash residue, approximately 2 to 5% of the volume of the input material, which is conservatively estimated to have 2.5% moisture content. The hydrated ash residue has the consistency of wet sand. The hydrated ash residue is captured in the pyrolysis chamber and removed periodically by a front loader. The loader transfers the hydrated ash residue to a



four-sided dumpster. Before the ash residue is sent to a landfill full TCLP tests are carried out to evaluate the suitability of sending that ash to the correct landfill.

Particulate emissions for the hydrated ash transfers were calculated based on AP42 Section 13.2.4, equation 1. The uncontrolled particulate emission factors were calculated as follows, with $k = 0.74$ for PM, $k = 0.35$ for PM_{10} , $k = 0.053$ for $PM_{2.5}$:

$$EF = k * (0.0032) * ((U/5)^{1.3}) / (M/2)^{1.4}$$

k = particle size multiplier; U = mean wind speed (7.76 mph); M = ash material moisture content = 2.5%.

The controlled particulate emissions were calculated using the same equation with an additional 50% reduction for having an enclosure control.

Initial performance tests for System 8 (PF1.001 through PF1.007) will be required for moisture content of the hydrated ash residue using ASTM Test Method 4959 or 2216.

2.4 PERMITTING DECISIONS

The following permitting decisions were made for the MediWaste Facility:

- Initial and Annual Performance Testing shall be required as detailed in Section 2.3.1 and 2.3.2 of this Technical Review.
- Unique Operating Parameters shall be required in the MediWaste Class II AQOP (see draft AQOP).
- Unique Monitoring and Recordkeeping shall be required in the MediWaste Class II AQOP (see draft AQOP).
- Determination that the proposed MediWaste Pyrolysis units are exempt from federal air regulations for incinerators (40 CFR 60 Subparts A, Ce, Ec, CCCC, DDDD, EEEE, and FFFF).

2.5 INSIGNIFICANT ACTIVITIES

There are no insignificant activities.



3.0 APPLICABLE REGULATIONS

3.1 NEVADA REVISED STATUTES

The Nevada Revised Statutes (NRS) are the current codified laws of the State of Nevada. The NRS is the statutory authority for the adoption and implementation of administrative regulations. The statutes relating to the control of air pollution are contained in Title 40, Public Health and Safety, Chapter 445B, Air Pollution, NRS 445B.100 through NRS 445B.640. The NRS specifies that the State Environmental Commission is the governing body given the power to adopt administrative regulations. Since the NRS is the enabling statutory authority, very few specific requirements are contained in the statutes. The NRS provides broad authority for the adoption and implementation of air pollution control regulations. This project will be subject to the NRS and will need to comply with all applicable regulations under the NRS. The NRS may be viewed online.

3.2 NEVADA ADMINISTRATIVE CODE

The Nevada Administrative Code (NAC) contains the regulations adopted by the State Environmental Commission (SEC), pursuant to the authority granted by the Nevada Revised Statutes (NRS), relating to the control of air pollution. The NAC requires, where State regulations are more stringent in comparison to Federal regulations, the State regulations are applicable. The NAC sets forth, by rule, maximum emission standards for visible emissions (opacity), PM₁₀ (particulate matter less than 10 microns in diameter) and sulfur emitting processes. Other requirements are established for incinerators, storage tanks, odors and maximum concentrations of criteria air pollutants in the ambient air. Other NAC regulations specify the requirements for applying for and method of processing applications for operating permits. All the equipment considered in this application must meet, at a minimum, the applicable standards and requirements set forth in the NAC, specifically, the emission standards contained in NAC 445B.22027 through 445B.22033 for particulate matter, 445B.2204 through 445B.22047 for sulfur emissions, 445B.22017 for opacity, and the Nevada Ambient Air Quality Standards (NAAQS) as set forth in NAC 445B.310 through 445B.311. The NAC may be viewed online.

The Pyrolysis Units (Systems 1 through 7) meet the definition of incinerator, NAC 445B.086, that states an “Incinerator” means an engineered apparatus capable of withstanding heat and designed to efficiently reduce solid, semisolid, liquid or gaseous waste at specified rates and from which the residues contain little or no combustible material. However, the Pyrolysis Units do not meet the definition of single-chamber incinerator (NAC 445B.168), nor multiple-chamber incinerator (NAC 445B.106) because the pyrolysis units do not involve burning or combustion, both of which are exothermic processes and require air oxygen. Pyrolysis is an endothermic process and does not require air oxygen. In addition, the pyrolysis units are not subject to NAC 445B.2207 because the pyrolysis units do not involve burning. Pyrolysis units only meet the definition of NAC 445B.086, which in itself does not trigger any additional NAC regulations pertaining to incinerators.

3.3 NEVADA APPLICABLE STATE IMPLEMENTATION PLAN

The Applicable State Implementation Plan (ASIP) is a document prepared by a state or local air regulatory agency and submitted to the United States Environmental Protection Agency (US EPA) for approval. Title I of the Clean Air Act is the statutory authority for the US EPA regulations that require a State to submit an ASIP. The contents of the ASIP are intended to show how a state, through the implementation and enforcement of the regulations contained in the ASIP, will either show how attainment of the NAAQS will be achieved or how a state will continue to maintain compliance with the national ambient air quality standards.



3.4 CODE OF FEDERAL REGULATIONS

The Code of Federal Regulations (CFR) are regulations adopted by the US EPA and published in the Federal Register pursuant to the authority granted by Congress in the Clean Air Act. The CFR addresses multiple aspects, including but not limited to, permitting requirements, performance standards, testing methods, and monitoring requirements. The CFRs may be viewed online.

3.4.1 NEW SOURCE PERFORMANCE STANDARDS

Section 111 of the Clean Air Act, “Standards of Performance for New Stationary Sources,” (NSPS) requires US EPA to establish federal emission standards for source categories which cause or contribute significantly to air pollution. Each NSPS defines the facilities subject to these requirements and prescribes emission limits for specified pollutants, compliance requirements, monitoring requirements, and test methods and procedures. These standards are intended to promote use of the best air pollution control technologies, taking into account the cost of such technology and any other non-air quality, health, and environmental impact and energy requirements. These standards apply to sources which have been constructed or modified since the proposal of the standard. These standards can be found in the CFR at Title 40 (Protection of Environment), Part 60 (Standards of Performance for New Stationary Sources).

Generally, state and local air pollution control agencies are responsible for implementation, compliance assistance, and enforcement of the NSPS. US EPA retains concurrent enforcement authority and is also available to provide technical assistance when a state or local agency seeks help. US EPA also retains a few of the NSPS responsibilities such as the ability to approve alternative monitoring methods to maintain a minimum level of national consistency.

The MediWaste Facility is not subject to any NSPS requirements.

NSPS – 40 CFR Part 60 NSPS Subpart A – General Provisions – Systems 1 through 8 **are not subject** to the provisions of Subpart A because the MediWaste Facility is not subject to any NSPS.

NSPS – 40 CFR Part 60 NSPS Subpart Ce – Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators – Applies to each hospital/medical/infectious waste incinerator(s) (HMIWI) for which construction was commenced after June 20, 1996 but no later than December 1, 2008, or for which modification is commenced after March 16, 1998 but no later than April 6, 2010. Systems 1 through 7 **are not subject** to the provisions of Subpart Ce because the MediWaste Facility will commence construction after December 1, 2008.

NSPS – 40 CFR Part 60 NSPS Subpart Ec – Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators – Applies to each individual hospital/medical/infectious waste incinerator (HMIWI) for which construction is commenced after December 1, 2008. Subpart Ec 60.50c(f) states any pyrolysis unit (defined in 40CFR60.51c) is not subject to subpart Ec. *Pyrolysis* means the endothermic gasification of hospital waste and/or medical/infectious waste using external energy. Systems 1 through 7 **are not subject** to the provisions of Subpart Ec because the MediWaste Facility will operate pyrolysis units and not incinerator units to thermally destroy HMI waste.

**NSPS – 40 CFR Part 60 NSPS Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration**

Units – Applies to commercial and industrial solid waste incinerator(s). Medical waste is not a commercial or industrial solid waste. Medical waste incineration units are exempt from Subpart CCCC as specified in 40 CFR 60.2020(c). The pyrolysis units at the MediWaste Facility thermally destroy medical waste. Systems 1 through 7 **are not subject** to the provisions of Subpart CCCC because the MediWaste Facility will not process commercial or industrial waste.

NSPS – 40 CFR Part 60 NSPS Subpart DDDD – Emission Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units

– Applies to commercial and industrial solid waste incinerator(s). Medical waste is not a commercial or industrial solid waste. Medical waste incineration units are exempt from Subpart DDDD as specified in 40 CFR 60.2555(c). The pyrolysis units at the MediWaste Facility thermally destroy medical waste. Systems 1 through 7 **are not subject** to the provisions of Subpart DDDD because the MediWaste Facility will not process commercial or industrial waste.

NSPS – 40 CFR Part 60 NSPS Subpart EEEE – Standards of Performance for Other Solid Waste Incineration Units

– Applies to very small municipal waste combustion units and institutional waste incineration units. Medical waste is not a municipal or institutional solid waste. Medical waste incineration units are exempt from Subpart EEEE as specified in 40 CFR 60.2887(f). The pyrolysis units at the MediWaste Facility thermally destroy medical waste. Systems 1 through 7 **are not subject** to the provisions of Subpart EEEE because the MediWaste Facility will not process municipal or institutional solid waste.

NSPS – 40 CFR Part 60 NSPS Subpart FFFF – Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units

– Applies to very small municipal waste combustion units and institutional waste incineration units. Medical waste is not a municipal or institutional solid waste. Medical waste incineration units are exempt from Subpart FFFF as specified in 40 CFR 60.2993(f). The pyrolysis units at the MediWaste Facility thermally destroy medical waste. Systems 1 through 7 **are not subject** to the provisions of Subpart FFFF because the MediWaste Facility will not process municipal or institutional solid waste.

3.4.2 FEDERAL NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

National Emission Standards for Hazardous Pollutants (NESHAP) are established in the CFR pursuant to Section 112 of the Clean Air Act Amendments of 1990. These standards regulate air pollutants believed to be detrimental to human health. The NESHAP program applies to all sources, both existing and new. These standards are codified in Title 40 CFR Parts 61 and 63.

Part 61, which predates the Clean Air Act Amendments of 1990, includes specific standards, reporting and recordkeeping requirements, and test methods for the initial eight hazardous air pollutants (HAPs): asbestos, benzene, beryllium, coke oven emissions, inorganic arsenic, mercury, radionuclides, and vinyl chloride. The regulations covering these eight hazardous air pollutants focused on health-based considerations. NESHAPs were established for certain operations that commonly emit the eight hazardous air pollutants.

Other substances were included for consideration due to the serious health effects, including cancer, which may occur from ambient air exposure to those substances. However, no specific restrictions were placed on facilities that used or released these compounds.

Under the Clean Air Act Amendments of 1990, Congress greatly expanded the Air Toxics program, creating a list of 189 substances to be



regulated as hazardous air pollutants. Rather than regulating individual pollutants by establishing health-based standards, the new Air Toxics program granted the US EPA the authority to regulate specific industrial major source categories with NESHAPs based on maximum achievable control technology (MACT) for each source category. Thus, a number of NESHAPs have been established to regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants.

The standards in 40 CFR Part 63 are independent of the NESHAPs contained in 40 CFR Part 61 which remain in effect until they are amended, if appropriate, and added to this part. More information on NESHAPs from the US EPA Unified Air Toxics Website may be viewed online.

NESHAPs may cover both major sources and area sources in a given source category. Major sources are defined as those facilities emitting, or having the potential to emit, 10 tons per year or more of one Hazardous Air Pollutant (HAP) or 25 tons per year or more of multiple HAPs. Major sources are required to comply with MACT standards. Area sources are defined as those facilities that are not major sources.

The MediWaste Facility is not a major source with respect to HAPs.

The MediWaste Facility is not subject to any NESHAP requirements.



5.0 AMBIENT AIR IMPACT ANALYSIS

5.1 INTRODUCTION/ PURPOSE

The purpose of this analysis is to determine the likely air quality impacts resulting from operation of the MediWaste Facility under the conditions specified in their draft AQOP.

5.2 CLASSIFICATION OF AIR BASIN

The facility is located in Hydrographic Basin (HA) 162 – Pahrump Valley.

HA 162 is not triggered for any pollutant.

5.3 AIR QUALITY MODELING ANALYSIS

Nevada Division of Environmental Protection – Bureau of Air Quality Planning (BAQP) performed the air quality modeling analysis. The memo to BAPC from BAQP dated October 6, 2025 presents the results of the air quality analysis. The results of this analysis are presented below in Table 5.3-1 and in the memo provided in Appendix 2. As can be seen, operation of MediWaste will not result in violations of the Nevada AAQS, because the total impacts are less than the applicable AAQS values.

Table 5.3-1
MediWaste Disposal, LLC - A2651 - AP4953-4771
Nevada Ambient Air Quality Impact Analysis

Pollutant	Averaging Period	Modeled Concentration	Background Concentration ^c	Total Impact	NAAQS	Percent of Standard	Location (UTM)	
							mN	mE
PM _{2.5}	24-hr (µg/m ³) ^a	25.9	8.0	33.9	35	96.8%	4,008,803	591,559
	Annual (µg/m ³) ^b	6.1	2.3	8.4	12.0	69.8%	4,008,803	591,554
PM ₁₀	24-hr (µg/m ³)	38.3	10.2	48.5	150	32.3%	4,008,803	591,554
SO ₂	1-hr (ppb) ^c	73.9		73.9	75.0	98.5%	4,008,803	591,569
	3-hr (µg/m ³)	191.9		191.9	1,300	14.8%	4,008,803	591,569
	24-hr (µg/m ³)	119.3		119.3	365	32.7%	4,008,803	591,554
	Annual (µg/m ³)	19.8		19.8	80.0	24.8%	4,008,803	591,554
NO ₂	1-hr (ppb) ^d	77.2		77.2	100	77.2%	4,008,803	591,569
	Annual (µg/m ³)	23.0		23.0	100	23.0%	4,008,803	591,554
CO	1-hr (µg/m ³)	35.4		35.4	40,500	0.1%	4,008,803	591,569
	8-hr (µg/m ³)	26.1		26.1	7,000	0.4%	4,008,803	591,566
Pb	Rolling 3 mo. Average (µg/m ³)	0.08		0.08	0.15	53.2%	4,008,803	591,554
H ₂ S	1-hr (µg/m ³)				112			
Ozone	8-hr (ppm)	0.008		0.008	0.075	10.9%		

^a98th percentile (8th high), averaged over 3 years

^bAnnual mean, averaged over 3 years

^c99th percentile (4th high) of 1-hr daily maximum concentrations, averaged over 3 years

^d98th percentile (8th high) of 1-hr daily maximum concentrations, averaged over 3 years

^ePM_{2.5} values are from the Jarbidge Wilderness Area. PM₁₀ values are from Lehman Caves (Great Basin NP).

Note: Averaging over years must still follow 40 CFR Part 51 Appendix W concerning 1 year of on-site MET data or 5 years of offsite MET data and must be the specific percentile for each individual year



BAPC

MediWaste Disposal LLC – Pahrump Facility

FIN: A2651; AP4953-4771

March 2026

Air Case 12444 - Class II New

Technical Review

6.0 CONCLUSIONS / RECOMMENDATIONS

Based on the above review and supporting data and analyses, operation of the MediWaste Facility under the draft Class II AQOP conditions will not result in violations of any applicable ambient air quality standards. Therefore, the BAPC recommends that the draft facility-wide operating permit be formally issued, with those applicable requirements, conditions, and restrictions contained therein:

Appendix 1 – BAPC Detailed Emission Inventory

Appendix 2 – NVAAQS Memo

Randy Phillips

Permit Writer

Bureau of Air Pollution Control

3/18/2026

Date

Tanya Soleta, PE

Supervisor, Permitting Branch

Bureau of Air Pollution Control

3/18/2026

Date



BAPC

MediWaste Disposal LLC – Pahrump Facility

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Appendix 1

BAPC Detailed Emission Inventory

Emissions Calculation Spreadsheet										FIR	A2051	Bios.	162	Palmpop Valley		Increment Tracked		No	Air Case Number Application Log (Available Application Log)		Nevada Division of Environmental Protection Bureau of Air Pollution Control										Date: 11/3/2025	Prepared By: Tanya
Med/Waste Disposal, LLC Palmpop Facility 1550 E. Basin Avenue, Palmpop, NV 89060										Permit No.: AP4953-4771	Class: NORTHING (ns)	Class II AQOP 4,000,853	County: EASTING (m)	Site: 591,513	Range: 20 S	EAD Average	4,710	None	12444	Model Type: Facility Only	APPROVED By Tanya at 4:15 pm, Nov 03, 2025											
Unit Description		SCC	Location UTM (Zone 11)		Stack/Emission Parameters		Operating Hours		Heat Input (MMBtu/hr)		Throughput/Fuel Usage		Power Output		Emission Factor		Controls															
System #			North (m)	East (m)			Daily	Annual	Hour	Annual	Hour	Annual	Units	Amount	Units	Pollutant	Factor	Unit	Type	Efficiency	(Btu/hr)	(lb/hr)	References	Combined?								
System 1 - Pyrolysis Unit 1 Medical Waste Pyrolysis Unit 1																																
S2.001A	Medical Waste Pyrolysis Unit #1 (4 natural gas fired burners rated at 500,000 Btu/hr, each, indirectly heating the pyrolysis chamber; Vulcan Systems, Model # BUR-B-25-4)	50410538	4,008,861	591,597	Height (ft)		25.0	24	8,760	4.0	35,040.0	3,921.6	34,352,941.2	scf, natural gas, combined		PM	0.2132	lb/hr				0.21	0.93	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
S2.001B	Natural gas fired Thermal Oxidizer #1 rated at 2,000,000 Btu/hr, equipped with flame detector; Model # DTO-E-10	50410538	4,008,861	591,597	Diameter (ft)		6.7				2 tons/batch/pyrolysis unit, 6 to 12 hours/batch	15,330.0	tons, medical waste, combined			PM10	0.1410	lb/hr				0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
					Temp (°F)		1250									PM2.5	0.1410	lb/hr				0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
					Exit Vel (ft/s)		4.8									SO2	0.4400	lb/hr				0.44	1.93	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
					Vol (ACFM)		10,000									NOX	0.6706	lb/hr				0.67	2.94	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
																CO	0.07814	lb/hr				0.078	0.34	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
																VOC	0.1154	lb/hr	thermal oxidizer 1	99.5%	0.12	0.51	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. Uncontrolled number back-calculated from performance testing data and 99.5% control. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined								
					Release Type		Vertical									Pb	1.12E-03	lb/hr				1.12E-03	4.91E-03	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							
																Hg	3.48E-05	lb/hr				3.48E-05	1.52E-04	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined							

Emissions Calculation Spreadsheet										Nevada Division of Environmental Protection Bureau of Air Pollution Control										Date	11/3/2025	Phillips				
Med/Waste Disposal, LLC Pahrump Facility 4950 E. Basin Avenue, Pahrump, NV 89060										Permit No: AP4953-4771		Facility UTM Coordinates: Section: 11		A2051 Item: Class: NORTHING (m): 20 S Township: 20 S		162 Class II AQOP 4,008,853		Palmyra Valley County: EASTING (m): 291,513 Range: 55 E SAD Average: 4,710		Increment Tracked: No Air Case Number Application Log (Multiple Applications) New: 12444		Model Type: Facility Only		APPROVED By Tanya at 4:15 pm, Nov 03, 2025		
Unit Description		SCC	Location UTM (Zone 11) North (m) East (m)		Stack/Effluent Parameters		Operating Hours Daily Annual		Heat Input (MMBtu) Hour Annual		Throughput/ Fuel Usage Hour Annual Units		Power Output Amount Units		Emission Factor Pollutant Factor Unit		Controls Type Efficiency (lb/hr) (ton/yr) References Combined?									
System #																										
																								</		

Emissions Calculation Spreadsheet										FIR	A2651	Bran.	{62	Palmerup Valley		Increment Tracked		No	Air Case Number Application Log (Multiple Applications)		Nevada Division of Environmental Protection Bureau of Air Pollution Control										Date	11/13/2025	Phillips																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Med/Waste Disposal, LLC										Palmerup Facility	A2651-34771	Class: NORTHING (m)	Class II AQDP 4,008,853	County: EASTING (m)	Ngr: 591,533	51 E	RAD Average	4,710	None	12444	Model Type: Facility Only																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
1550 E. Basin Avenue, Palmerup, NV 89060										Facility UTM Coordinates: Section: 11	Technology: 11	20 S	Range:																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													

APPROVED
By Tanya at 4:15 pm, Nov 03, 2025

Emissions Calculation Spreadsheet										Permit No: AP4953-4771		Facility UTM Coordinates: 11		Location UTM (Zone 11)		Stack/Effluent Parameters		Operating Hours		Heat Input (MMBtu)		Throughput/Fuel Usage		Power Output		Emission Factor		Controls		Efficiency		References		Combined?																			
MedWaste Deposed, LLC Palmyra Facility 4550 E. Basin Avenue, Palmyra, NY 09660										County: EASTING (m)		Ngr: 591,533		Range: 51 E		EAD Average: 4,710												Model Type: Facility Only																									
Unit Description										SCC		Location UTM (Zone 11)		Stack/Effluent Parameters		Operating Hours		Heat Input (MMBtu)		Throughput/Fuel Usage		Power Output		Emission Factor		Controls		Efficiency		References		Combined?																					
System #										North (m)		East (m)		Daily		Annual		Hour		Annual		Hour		Annual		Units		Amount		Units		Pollutant		Factor		Unit		Type		Efficiency		(lb/hr)		(ton/yr)		References		Combined?					
System 5 - Pyrolysis Unit 5										Medical Waste Pyrolysis Unit 5																																											
S2.005A										Medical Waste Pyrolysis Unit #5 (4 natural gas fired burners rated at 100,000 Btu/hr, each, indirectly heating the pyrolysis chamber, Valuron Systems, Model F1B/DL-B-25-4)		50410538		4,008,848		591,585		Height (ft)		25.0		24		8,760		4.0		35,040.0		3,921.6		34,352,941.2		scf, natural gas, combined				PM		0.2132		lb/hr				0.21		0.93		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.		Emissions are combined	
S2.005B										Natural gas fired Thermal Oxidizer #5 rated at 2,000,000 Btu/hr, equipped with flame detector, Model # FTO-E-10		50410538		4,008,848		591,585		Diameter (ft)		6.7				2 tons/batch/pyrolysis unit, 6 to 12 hours/batch		15,330.0		ton, medical waste, combined						PM10		0.1410		lb/hr				0.14		0.62		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.		Emissions are combined					
																Temp (°F)		1250														PM2.5		0.1410		lb/hr				0.14		0.62		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.		Emissions are combined							
																Exit Vel (ft/s)		4.5														SO2		0.4400		lb/hr				0.44		1.93		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.		Emissions are combined							
																Vol (ACFM)		10,000														NOX		0.6706		lb/hr				0.67		2.94		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 4 times the test data was used to determine emission factor.		Emissions are combined							
																																CO		0.07814		lb/hr				0.078		0.34		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 4 times the test data was used to determine emission factor.		Emissions are combined							
																																VOC		0.1154		lb/hr		thermal oxidizer 5		99.5%		0.12		0.51		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. Uncontrolled number back-calculated from performance testing data and 99.5% control. A safety factor of 4 times the test data was used to determine emission factor.		Emissions are combined					
																Release Type		Vertical														Pb		1.12E-03		lb/hr				1.12E-03		4.91E-03		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 4 times the test data was used to determine emission factor.		Emissions are combined							
																																Hg		3.48E-05		lb/hr				3.48E-05		1.52E-04		Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 4 times the test data was used to determine emission factor.		Emissions are combined							

APPROVED
By Tanya at 4:15 pm, Nov 03, 2025

Emissions Calculation Spreadsheet										Nevada Division of Environmental Protection Bureau of Air Pollution Control										Date: 11/3/2024		Phillips			
Med/Waste Disposal, LLC Palomero Facility 1550 E. Basin Avenue, Palomero, NY 89060										Permit No.: AP40953-4771		Class: Class II AQOP		County: Nye		Increment Tracked: No		Air Case Number: Application Log (Multiple Applications)		Model Type: Facility Only		APPROVED By Tanya at 4:15 pm, Nov 03, 2025			
										Facility UTM Coordinates:		4,000,853		EASTING (m): 591,513		New		1,344							
										Section: 11		Township:		20.5		Range: 53 E		SAD Average: 4,710							
Unit Description		SCC	Location UTM (Zone 11)		Stack/Vent/Parameters		Operating Hours		Heat Input (MMBtu/hr)		Throughput/ Fuel Usage		Power Output		Emission Factor			Controls							
System #			North (m)	East (m)			Daily	Annual	Hour	Annual	Hour	Annual	Units	Amount	Units	Pollutant	Factor	Unit	Type	Efficiency	(lb/hr)	(m³/hr)	References	Combined?	
																HAPs					7.84E-02	1.43E-01	0.00		
																CO2e					473.4	2073.4	0.00		
					Is this an Alternative Scenario?	No																			
System 6 - Pyrolysis Unit 6																									
S2-006A	Medical Waste Pyrolysis Unit 10 (4 natural gas fired burners rated at 100,000 Btu/hr, each, indirectly heating the pyrolysis chamber. Valves Systems, Model F-B (R-B-25-4)	50410538	4,008,848	591,581	Haght (ft)	25.0	24	8,760	4.0	35,040.0	1,921.6	34,352,941.2	scf, natural gas, combined				PM	0.2132	lb/hr		0.21	0.93	Performance Testing Results from "Like-Kind" Pyrolysis Units 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
S2-006B	Natural gas fired Thermal Oxidizer 10 rated at 2,000,000 Btu/hr, equipped with flame detector; Model 6 BT-D-E-10	50410538	4,008,848	591,581	Diameter (ft)	6.7					2 tons/batch/pyrolysis unit: 6 to 12 hours/batch	15,330.0	tons, medical waste, combined				PM10	0.1410	lb/hr		0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
					Temp (°F)	1250											PM2.5	0.1410	lb/hr		0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
					Exh Vol (ps)	4.4											SO2	0.4400	lb/hr		0.44	1.93	Performance Testing Results from "Like-Kind" Pyrolysis Units 2016, 2019, and 2023 Testing Data. A safety factor of 3.8 times the test data was used to determine emission factor.	Emissions are combined	
					Vol (ACFM)	10,000											NOX	0.6706	lb/hr		0.67	2.94	Performance Testing Results from "Like-Kind" Pyrolysis Units 2016, 2019, and 2023 Testing Data. A safety factor of 4 times the test data was used to determine emission factor.	Emissions are combined	

Emissions Calculation Spreadsheet				FDN	A2651	Item	162	Palomero Valley		Increment Tracked		No	Air Cntr Number Application Log (Multiple Applications)		Nevada Division of Environmental Protection Bureau of Air Pollution Control				Date	11/3/2024	Phillips				
Med/Waste Disposal, LLC				Permit No.	AP4953-4771	Class	Class II AQOP	County	Nye	591,513		591,513	591,513	12444	Model Type:		APPROVED By Tanya at 4:15 pm, Nov 03, 2025								
Palomero Facility				Facility UTM Coordinates	NORTHING (m)		EASTING (m)		591,513		591,513		591,513		Facility Only										
1550 E. Basin Avenue, Palomero, NV 89060				Section	11		20 S		51 E		51 E		51 E		51 E										
Unit Description		SCC	Location UTM (Zone 11)		Stack/Effluent Parameters		Operating Hours		Heat Input (MMBtu/hr)		Throughput/Fuel Usage			Power Output		Emission Factor		Controls		Efficiency	(lb/hr)	(lb/day)	Reference	Combined?	
			North (m)	East (m)			Daily	Annual	Hour	Annual	Hour	Annual	Units	Amount	Units	Pollutant	Factor	Unit	Type						
System 7 - Pyrolysis																									
Medical Waste Pyrolysis Unit 7																									
Unit 7																									
\$2,007A	Medical Waste Pyrolysis Unit #7 (4 natural gas fired burners rated at 100,000 Btu/hr, each, indirectly heating the pyrolysis chamber; Valuron Systems, Model F-BU-LB-25-4)	50410538	4,008,848	591,577	Height (ft)	25.0	24	8,760	4.0	35,040.0	3,921.6	34,352,941.2	scf, natural gas, combined				PM	0.2132	lb/hr		0.21	0.93	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
\$2,007B	Natural gas fired Thermal Oxidizer #7 rated at 2,000,000 Btu/hr, equipped with flame detector; Model # ETO-E-10	50410538	4,008,848	591,577	Diameter (ft)	6.7					2 tons/batch/pyrolysis unit, 6 to 12 hours/batch	15,330.0	ton, medical waste, combined				PM10	0.1410	lb/hr		0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
					Temp (°F)	1250											PM2.5	0.1410	lb/hr		0.14	0.62	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
					Exit Vol (g/s)	4.8											SO2	0.4400	lb/hr		0.44	1.93	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
					Vol (ACFM)	10,000											NOX	0.6706	lb/hr		0.67	2.94	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
																	CO	0.07814	lb/hr		0.078	0.34	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
																	VOC	0.1154	lb/hr	thermal oxidizer 7	99.5%	0.12	0.51	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. Uncontrolled number back-calculated from performance testing data and 99.5% control. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined
					Release Type	Vertical											Pb	1.12E-03	lb/hr		1.12E-03	4.91E-03	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	
																	Hg	3.48E-05	lb/hr		3.48E-05	1.52E-04	Performance Testing Results from "Like-Kind" Pyrolysis Units, 2016, 2019, and 2023 Testing Data. A safety factor of 1.4 times the test data was used to determine emission factor.	Emissions are combined	

APPROVED
By Tanya at 4:15 pm, Nov 03, 2025



BAPC

MediWaste Disposal LLC – Pahrump Facility

FIN: A2651; AP4953-4771

March 2026

Air Case 12444 - Class II New

Technical Review

Appendix 2

NVAAQS Memo

NVAAQS Analysis - Memo

To: Randy Phillips and Tanya Soleta, BAPC

From: Scott Speckart, BAQP

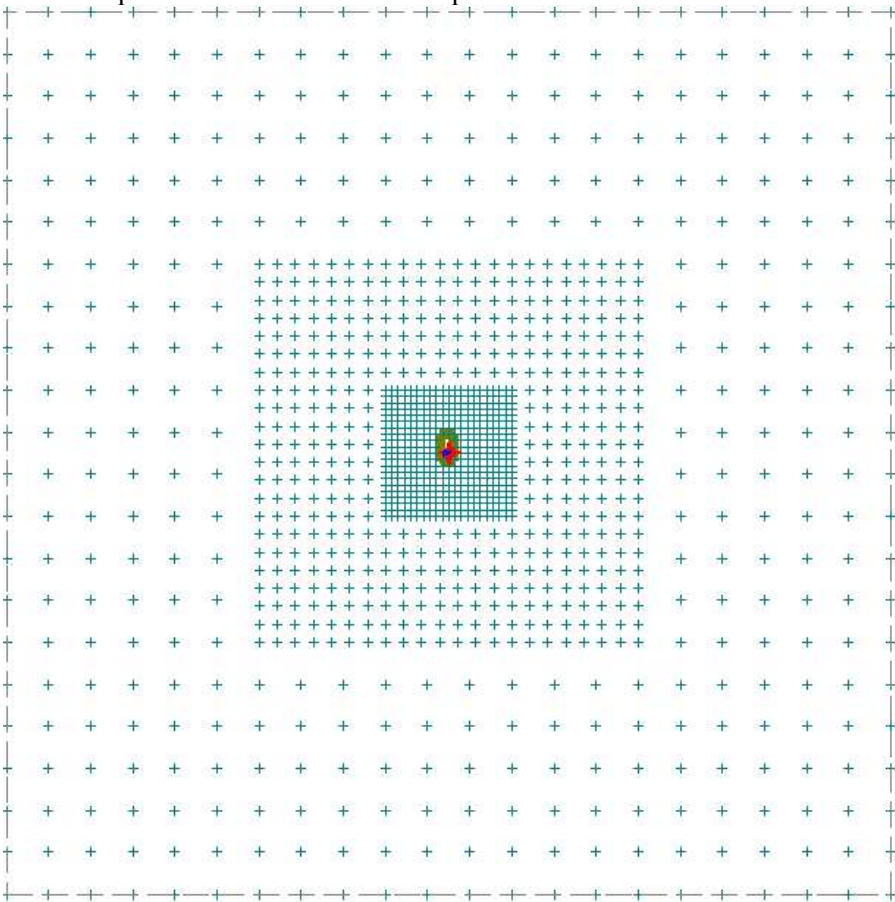
CC: Permitting Files by way of Permit Writer

Date: 10/6/2025

Re: NVAAQS Memo: MediWaste Disposal, LLC - Pahrump Facility (A2651; AP4953-4771; AC 12444)

The BAQP performed a modeling analysis to show compliance with the Nevada Ambient Air Quality Standards, and the National Ambient Air Quality Standards for aforementioned proposed permitting action. The technical details of the modeling analysis are presented in the table below. Unless otherwise noted, all sources were characterized in accordance with the most recent BAQP policy, EPA Guidance, and regulatory default options as described in 40 CFR Part 51 Appendix W.

NvAAQS Applicability Date	5/16/2018	
Hydrographic Area	HA162	
AERMOD Version	v.24124	
Pollutants Analyzed	CO ^(1-hr, 8-hr) , NO ₂ ^(1-hr, Ann.) , PM _{2.5} ^(24-hr, Ann.) , PM ₁₀ ^(24-hr.) , SO ₂ ^(1-hr, 3-hr, 24-hr, Ann.) , Pb ^(3Mo)	
Met Station	Surface: Desert Rock NWS	Profile: Desert Rock NWS
Summary	MediWaste Disposal LLC applied for a new air permit.	
Met Years Used	2018 - 2022	
AERMET Version	v.24124	
Modeling Datum	NAD83	
Model Source Parameter Notes	Source location, release height, release temperature and flow rates were provided by the applicant and were verified based on the permit writer's spreadsheet. The emission rates are based on BAPC emissions calculations, which were based on the applicant requested operation parameters.	
Plant Boundary	The plant boundary was modeled as indicated in facility correspondence.	
Model Receptors	The plant boundary contained receptors with a spacing of 2.5 m at the plant boundary (The SO ₂ 1 Hr. model contains a handful of receptors near the highest receptor to ensure the standard was not exceeded in the model) The grid spacing	

	increased to 350 m and covered a 49 km² area containing the facility. A total of 1955 receptors were utilized. The receptors are shown below. 	
Modeled Buildings	Buildings were modeled as specified in application and verified by Google Earth imagery.	
Terrain Processing	AERMAP v.18081 was used to process the terrain within the model boundary, and assign base elevations for all receptors, sources, and buildings.	
Terrain Data Used	USGS NED 1 (30m)	
Background Concentrations	PM _{2.5} Annual – 2.3 µg/m ³	PM ₁₀ 24-hr – 10.2 µg/m ³
		PM _{2.5} 24-hr – 8.0 µg/m ³
Additional Modeling Analysis Comments		
Analysis Results	The BAQP's analysis of the impacts of the proposed action to ambient air quality shows that the proposed action will not cause an exceedance of any applicable Nevada Ambient Air Quality Standards. Please refer to the model tab of emissions inventory spreadsheet for this permit action for the modeled concentration results.	