

NDEP-BAPC PENALTY RECOMMENDATIONS - December 3, 2014

TAB NO.	COMPANY NAME	VIOLATION & PENALTY SUMMARY	NOAV NUMBER	RECOMMENDED PENALTY
A	A&K Earth Movers, Inc., Churchill County	<p><u>NOAV 2512</u> Violation: Failure to install required air pollution control Control: Fogging Water Spray System(s): PF1.054</p> <p>Base Penalty: \$1,000, for Class 2 Source Magnitude (Multiplier): 8 Weeks Violation History (Adjustment): 5 violations within past 5 years (1 similar violation within 5 years) = 170% Total Penalty: $(\\$1,000 \times 8) + (\\$8,000 \times 170\%) = \mathbf{\\$21,600}$</p> <p><u>NOAV 2512</u> Violation: Failure to operate required air pollution control Control: Fogging Water Spray System(s): PF1.053 and PF1.055</p> <p>Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 2 Emission Units Violation History (Adjustment): 5 violations within past 5 years (1 similar violation within 5 years) = 170% Total Penalty: $(\\$600 \times 2) + (\\$1,200 \times 170\%) = \mathbf{\\$3,240}$</p>	2512	\$24,840

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<p>B</p>	<p>Bango Refining NV, LLC., Churchill County</p>	<p><u>NOAV 2517</u> Violation: Failure to comply with a permitted operating parameter Operating Parameter: Throughput Rate System(s): System 1A and 5A Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 29 Weeks Violation History (Adjustment): N/A Total Penalty: \$600 x 29 = \$17,400</p> <p><u>NOAV 2518</u> Violation: Failure to comply with a permitted operating parameter Operating Parameter: Throughput Rate System(s): System 1A Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 6 Days Violation History (Adjustment): N/A Total Penalty: \$600 x 6 = \$3,600</p> <p><u>NOAV 2520</u> Violation: Failure to comply with a permitted operating parameter Operating Parameter: Throughput Rate System(s): System 7A Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 16 Weeks Violation History (Adjustment): N/A Total Penalty: \$600 x 16 = \$9,600</p> <p><u>NOAV 2521</u> Violation: Failure to comply with a permitted operating parameter Operating Parameter: Throughput Rate System(s): System 12 Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 2 Emission Units Violation History (Adjustment): N/A Total Penalty: \$600 x 2 = \$1,200</p>	<p>2517, 2518, 2520 and 2521</p>	<p>\$31,800</p>
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C	Robinson Nevada Mining Company, White Pine County	<p><u>NOAV 2498</u> Violation: Failure to conduct required IOCD Testing System(s): Systems 19 through 27</p> <p>Base Penalty: \$200, for Class 2 Source Magnitude (Multiplier): 9 systems Violation History (Adjustment): N/A Total Penalty: \$200 x 9 = \$1,800</p> <p><u>NOAV 2500</u> Violation: Failure to conduct required monitoring/recordkeeping System(s): Systems 19 through 27</p> <p>Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 14 Weeks Violation History (Adjustment): N/A Total Penalty: \$600 x 14 = \$8,400</p> <p><u>NOAV 2501</u> Violation: Failure to comply with a permitted operating parameter Operating Parameter: Throughput Rate System(s): Systems 19 through 27</p> <p>Base Penalty: \$600, for Class 2 Source Magnitude (Multiplier): 14 Weeks Violation History (Adjustment): N/A Total Penalty: \$600 x 14 = \$8,400</p> <p><u>NOAV 2503</u> Violation: Failure to install required air pollution control Control: Water Spray System(s): Systems 19, 20, 23, 24, and 27</p> <p>Base Penalty: \$1,000, for Class 2 Source Magnitude (Multiplier): 5 Systems Violation History (Adjustment): n/A Total Penalty: \$1,000 x 5 = \$5,000</p>	2498, 2500, 2501, 2503, 2504, 2505, and 2506	\$55,100
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C	Robinson Nevada Mining Company, White Pine County	<p><u>NOAV 2504</u> Violation: Constructing and operating without a valid permit System(s): Lime Mill, Conveyors ,Diesel Generators</p> <p>Base Penalty: \$3,000, for Class 2 Source Magnitude (Multiplier): 5 Systems Violation History (Adjustment): N/A Total Penalty: \$3,000 x 7 = \$21,000</p> <p><u>NOAV 2505</u> Violation: Failure to conduct required compliance source testing System(s): Systems 2 and 4</p> <p>Base Penalty: \$5,000, for Class 2 Source Magnitude (Multiplier): 2 systems Violation History (Adjustment): N/A Total Penalty: \$5,000 x 2 = \$10,000</p> <p><u>NOAV 2506</u> Violation: Failure to control fugitive dust Total Penalty: \$500, established by NAC 455B.281</p>	<p>2498, 2500, 2501, 2503, 2504, 2505, and 2506</p>	<p>\$55,100</p>
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