

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

**Klondex Midas Operations Inc.
Midas Mine Site
Elko County, Nevada
April 29, 2024**

Klondex Midas Operations Inc. (Klondex Midas) submitted an application for an administrative renewal of Class I Air Quality Operating Permit AP1041-2980.01, FIN A0175, for the Klondex Midas facility in Elko County, Nevada. The project is located 2.5 miles southeast of Midas, Nevada., in all or portions of Sections 34 and 35, Township 40N, Range 46E; Sections 2-5, 7-28, 33 and 34, Township 39N, Range 46E; Sections 7, 18, 19 and 30, Township 39N, Range 47E; Section 3, Township 38N, Range 46E, M.D.B.&M.

Klondex – Midas includes a primary and secondary crushing circuit that handles both ore and waste, and also a conventional milling circuit, where pulverized ore is treated in a Merrill-Crowe zinc precipitation circuit to remove gold and silver. All gold and silver refining is done on site. Klondex – Midas is proposing to renew their Class I AQOP.

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.

	<i>Klondex Midas Operations Inc. Potential to Emit (PTE)</i>			
	Pollutant	Class I (tons/year)	Facility-Wide (tons/year)	
Current emissions estimates indicate Klondex Midas is a minor source as emissions of one or more criteria pollutant are less than 100 tons per year (TPY), but the facility is subject to 40 CFR Part 63 Subpart EEEEEEE and is required to have a Class I (Title V) operating permit. Klondex Midas is classified as an area source of HAPs as the PTE for a single HAP is less than 10 TPY and combined HAPs are less than 25 TPY.	PM	Particulate Matter	8.07	47.67
	PM₁₀	Particulate Matter ≤ 10 microns in diameter	8.07	45.98
	PM_{2.5}	Particulate Matter ≤ 2.5 microns in diameter	8.07	44.77
	SO₂	Sulfur Dioxide	1.12	2.68
	NO_x	Oxides of Nitrogen	9.71	22.04
	CO	Carbon Monoxide	5.60	13.89
	VOC	Volatile Organic Compounds	0.60	2.05
	Pb	Lead	0.00	3.65E-05
	Hg	Mercury	0.00428	0.00428
	HAP (single)	Hazardous Air Pollutants	< 10	< 10
	HAPs (all)	Hazardous Air Pollutants	< 25	< 25
	GHG (CO_{2e})	Greenhouse Gases (Carbon Dioxide Equivalent)	8.74	9,949.04

The project is located in Air Quality Hydrographic Area (HA) 63 of the Willow Creek. HA 63 is not a triggered basin for an increment analysis. Klondex Midas will be subject to 40 CFR Part 63 Subpart EEEEEEE – National Emission Standards for Hazardous Air Pollutants: Gold Mine Ore Processing and Production Area Source Category.

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 Klondex Midas will not violate any air quality standard.

Prevention of Significant Deterioration (PSD) review is not triggered for this permit action. No adverse air quality impacts are anticipated as a result of the proposed action. Klondex Midas shall comply with all State and Federal air quality requirements and all conditions established within the proposed draft operating permit.