ndep
NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
protecting the future for generations

SURFACE AREA DISTURBANCE PERMIT
FUGITIVE DUST CONTROL PLAN

I. COMPANY INFORMATION				
COMPANY NAME:	Comstock Mining LLC	PERMIT NUMBER: AP		AP1041-2761
BUSINESS ADDRESS:	1200 American Flat Road	Virginia City	NV	Storey
	(STREET)	(CITY/TOWN)	(STATE)	(COUNTY)
MAILING ADDRESS:	P.O. Box 1118	Virginia City	NV	89440
	(STREET/P.O BOX)	(CITY/TOWN)	(STATE)	(ZIP CODE)
PHONE NUMBER:	775-847-5272	FAX NUMBER:	775-847-4762	

II. RESPONSIBLE OFFICIAL (R.O.)				
R.O. NAME	Corrado DeGasperis	TITLE	President & CEO	
BUSINESS ADDRESS:	1200 American Flat Road	Virginia City	NV	Storey
	(STREET)	(CITY/TOWN)	(STATE)	(COUNTY)
MAILING ADDRESS:	P.O. Box 1118	Virginia City	NV	89440
	(STREET/P.O BOX)	(CITY/TOWN)	(STATE)	(ZIP CODE)
PHONE NUMBER:	775-847-5272	FAX NUMBER:	775-847-4762	

III. PHYSICAL PLANT					
PROJECT ADDRESS:	1200 American Flat Road	Virginia City	NV	Storey	
	(STREET)	(CITY/TOWN)	(STATE)	(COUNTY)	
MAILING ADDRESS:	P.O. Box 1118	Virginia City	NV	89440	
	(STREET/P.O BOX)	(CITY/TOWN)	(STATE)	(ZIP CODE)	
PHONE NUMBER:	775-847-5272	FAX NUMBER:	775-844-4762		
MAJOR X- STREETS:	Hwy 342 and American Flat Road, Gold Hill				
SECTION:	21E	TOWNSHIP:	5, 6, 7 & 8	RANGE:	16
UTM:	269,734E & 4,350,568N				
PROJECT MAPS: (MARK TYPE OF MAP ATTACHED)	☐ (TRACT)	☐ (SITE)	X (TOPOGRAPHIC)	☐ (OTHER -)	

SURFACE AREA DISTURBANCE PERMIT
FUGITIVE DUST CONTROL PLAN

IV. ACKNOWLEGEMENT OF ENVIRONMENTAL CONTROL REQUIREMENTS BY R.O.

I, Corrado DeGasperis (R.O. Name), the Responsible Official for Comstock Mining LLC (Company Name), have: (1) read and understand the provisions of Nevada Administrative Code (NAC) Section 445B.22037 "Emissions of Particulate Matter: Fugitive Dust" which requires that we prevent controllable fugitive dust to become airborne on a 7-day/24-hour /day basis at our Project's site; and , (2) read and understand the terms and conditions of our Project's Nevada Division of Environmental Protection Bureau of Air Pollution Control Permit AP1041-2761. (Permit Number)

Signed _____ (R.O. Signature) Date 12/6/12

V. PROJECT OPERATIONS

Description of Project Operations: Comstock Mining LLC is conducting mining, processing and exploration activities in association with the Lucerne Project. Comstock uses water trucks and additives, such as Lignan Sulfonate to control dust on frequently used dirt roads.

We use riprap and rumble strips to minimize track out onto Highway 342. We also run a street sweeper on the highway to clean any dirt or dust.

During high wind events, we either slow mining related traffic to 10 mph, or we stop hauling operations.

VI. FUGITIVE DUST CONTROL - BEST PRACTICAL METHODS

Best Practical Methods for controlling fugitive dust (Project Site): The best practical methods (BPMs) to be used for controlling fugitive dust generated at this Project's disturbed areas are as follows. This is not an all inclusive list, other BPMs may also be appropriate for this section (check appropriate BPMs):

- X Use of water trucks to spray water on disturbed areas on a regular basis
- X Pre-watering of areas to be disturbed (including all unpaved onsite roads and staging areas)
- X Graveling of roadways, storage areas and staging areas
- X Posting and limiting vehicle speeds to 10-15 miles per hour
- ☐ Use of wind fences to reduce wind impacts
- X Cessation of all operations when winds make fugitive dust control difficult
- X Fencing or berming to prevent unauthorized access to disturbed areas.
- X Application of water sprays on material storage piles on a regular basis
- ☐ Covering material storage piles with tarpaulin or geo-textiles; tenting
- ☐ Use of overhead water spray rack or water hoses to water down uncovered trucks transporting processed materials prior to leaving Project boundaries.
- X Track-out controls
  - X Graveled entrance and exit areas
  - X Street Sweeping
  - ☐ Other
- X Subcontractors: Any and all subcontractors (including truck drivers) informed of their responsibilities for the control of fugitive dust while they are on the project site (including haul roads to and from the site). In addition, they will be advised of the best practical methods for controlling their fugitive dust as well as keeping off adjacent areas not covered by the project's permit.
- X Training of construction equipment operators to recognize fugitive dust generation and having the authority to shut down operations until water truck arrives and sprays water on the disturbed areas
- X Equipment Operator and/or Responsible Official has read and understands the requirements in the Project's Surface Area Disturbance Permit and Plan
- ☐ Other Applicable BPM: _____
- ☐ Other Applicable BPM: _____
- ☐ Other Applicable BPM: _____

VII. PROJECT FUGITIVE DUST/EMISSIONS RESOURCES INFORMATION

Water Trucks: Water trucks may be owned or rented. In the event that one or more water truck(s) necessary for control of fugitive dust (owned, rented or leased) becomes inoperable, additional water truck(s) will be rented or leased for until such time the water truck(s) are operable. Operable water truck (s) must be available on 7-day/week, 24-hour/day basis.

Number of Water Trucks:			
Water Truck # 1	2500 gallons	**Capacity Gallons:**	
Water Truck # 2	4000 gallons	**Capacity Gallons:**	
Water Truck # 3	NA	**Capacity Gallons:**	

Location of water supply for control of fugitive dust: Fill Stand in SW corner of process area. The location is

SW1/4, SE1/4, SW1/4 Section 6 T16N R21E

Water may also be pumped from the fire water pond at UTM NAD87 Zone 11N 269,730E & 4,351,137N

VII. PROJECT FUGITIVE DUST/EMISSIONS RESOURCES INFORMATION (Continued)

Water Truck and Construction Equipment Operational Log: the daily operations log book for recording the operation of the water truck and construction equipment is maintained on the Project site. The log contains the following information:

- Hours of operation for each water truck and construction equipment (front loader, scraper, etc.) used onsite.
- The daily quantity of water used for fugitive dust control purposes.
- Starting and ending times for the workday.
- Record of water truck (including rental water truck) and construction equipment maintenance, malfunctions and repairs

VIII. NOTIFICATION

Excess Emissions: Comstock Mining will shut down during high wind events that may cause excess emissions.

IX. TRAINING

Training Requirements: Crusher and pit operators maintain USEPA Method 9 visual emission training certification to recognize when the facility's permit's opacity limits are being exceeded and procedures to follow to bring systems back into compliance. It is recommended that all training records be kept with the facility's Process and Emission Control Equipment Operational Log.

X. PLAN REVISION

Plan Revision Requirements: In the event there are changes in the operation of the Project, modifications made to the Project's Air Quality Operating Permit or changes to the Nevada Administrative Code affecting this plan, the plan shall be revised to reflect those changes and modifications and resubmitted to the Nevada Division of Environmental Protection for review and evaluation.

Plan Date:	December 6, 2012