

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**

**Nevada Mercury Control Program  
Mercury Operating Permit to Construct**

**September 9, 2010**

Antler Peak Gold Inc., has submitted a new unit application for a Phase-2 Mercury Operating Permit to Construct (MOPTC) pursuant to NAC 445B.3633.1 to the Nevada Division of Environmental Protection-Bureau of Air Pollution Control (NDEP-BAPC) for (1) carbon kiln, (1) pregnant tank, (1) barren tank, and (2) retorts on April 22, 2010.

The applicable facility, located in basin HA 109 – East Walker Area, in Mineral County is:

*Esmeralda Mine  
2800 Lucky Boy Pass Road  
Hawthorne, Nevada 89415*

The NDEP-BAPC has reviewed the application and has made a preliminary determination to issue the MOPTC. The draft MOPTC consists of a carbon stripping and regeneration system comprised of (1) carbon kiln, (1) pregnant tank, and (1) barren tank and a retort system comprised of (2) retorts, with an emissions performance standard and control technologies determined to be NvMACT pursuant to NAC 445B.3683.2(b).

The draft MOPTC includes requirements for monitoring, recordkeeping, annual stack testing for mercury emissions, annual emissions reporting, annual mercury co-product reporting, limits of operation, and work practice standards, which minimize emissions of mercury to the atmosphere. Other permit contents include a mercury emission limit for the autoclave system.

Final NvMACT mercury emissions performance limit for the carbon stripping and regeneration system is:  $1 \times 10^{-5}$  gr/dscf mercury and for the retort system is  $1 \times 10^{-4}$  gr/dscf mercury. Determination of proposed NvMACT mercury emissions control technology for the regeneration system is determined to be: a dynamic wet scrubber, and a carbon bed deep scrubber. Determination of proposed NvMACT mercury emissions control technology for the retort system is determined to be: a mercury condenser equipped with a chiller, and a carbon tray scrubber.

The proposed project will not cause or contribute to a violation of any applicable Federal or State air quality standard. After review of the application and independent NDEP-BAPC analyses, the agency has determined that the Antler Peak Gold Inc., MOPTC may be issued and operated. The proposed sources must comply with all State and Federal air quality requirements and all conditions established within the draft MOPTC.

Copies of this permit action's public notice and the draft Mercury Operating Permit to Construct are available for review on the Nevada Division of Environmental Protection - Bureau of Air Quality Planning website at:  
<http://ndep.nv.gov/baqp/hg/pub.html>