

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**

February 3, 2011

Plum Mining Company LLC, 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) retort and (1) furnace on November 24, 2010.

The applicable facility, located in basin HA 103 – Dayton Valley, in Storey County is:

*Plum Mining Company, LLC
1200 American Flats Road
Gold Hill, Nevada 89440*

The NDEP-BAPC has reviewed the application and has made a preliminary determination to issue the MOPTC. The draft MOPTC consists of a Merrill-Crowe process comprised of (1) retort and (1) furnace 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 retort system is: 1×10^{-4} gr/dscf mercury and for the furnace system is 1×10^{-5} gr/dscf mercury. 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 bed deep scrubber. Determination of proposed NvMACT mercury emissions control technology for the furnace system is determined to be: a carbon deep bed 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 Plum Mining Company LLC, 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 Pollution Control website at:

<http://ndep.nv.gov/bapc/hg/pub.html>