Month xx, 20xx

Mr./Mrs. Some Body
Title
Facility
Address
Somewhere, Nevada 89xxx

Re: Source Test Protocol for 20xx; Determining Total Mercury Emissions (FIN A0xxx)

Dear Mr./Mrs. Body:

The Nevada Division of Environmental Protection – Bureau of Air Quality Planning (NDEP-BAQP) through the Nevada Mercury Control Program (NMCP) has reviewed the "Test Plan (Protocol) to determine mercury emission rates from various sources" prepared on behalf of (***company – facility***) by (***testing company***), received Month xx, xxxx. (***facility***) operates under a Mercury Operating Permit to Construct (MOPTC) No. APxxxx-xxxx. On Month xx, xxxx, (***facility***) confirmed tests are being conducted to comply in part with the NMCP's requirement for annual testing pursuant to **NAC 445B.3675.2(c)**.

The NMCP has the following comments concerning the planned source tests. The NMCP has determined that EPA Method 29 must be used to quantify emissions of total mercury from applicable source under the NMCP. EPA Method 29 shall be run in conjunction with EPA Methods 1 through 4 to determine the total mercury mass emission rate in lbs – Hg/hour for each unit. Because EPA Method 29 includes the sampling and analysis of particulate matter, the tests must achieve acceptable isokinetics sampling rates (100% +/- 10%).

Any deviations to the federal reference test methods shall be approved by the NMCP prior to conducting the tests. The source tests must be conducted in accordance with any applicable requirements established in the MOPTC, and with the applicable state and federal regulations. The absence of cyclonic flow must be verified each time, before testing the system. The NMCP requires that the amount of particulate matter (PM) collected in the front half of the EPA Method 29 sampling train is determined during the tests. Section 8.2.6 of the reference method describes the proper procedure, which requires an acetone rinse (rather than nitric acid) to conduct the PM determination. The NMCP also requires the collection of a minimum sample volume of 60 dry standard cubic feet (dscf) during each test run, which shall be conducted for a minimum of 90 minutes up to a maximum of two hours in an effort to collect the sample.

Pursuant to **NAC 445B.252.3**, the NDEP determines the conditions of operation required for tests of performance. EPA Method 29 tests shall be conducted near the maximum production rate as established in the MOPTC. If the permitted MOPTC throughput rate is not representative of typical operations, the facility must provide to the NMCP the representative operating rate prior to the actual testing event. This will consist of the monthly average operating throughput for the last 12 calendar months of operation.

The NMCP requires analysis of the mercury content of representative samples of the material that the thermal unit processes during the source testing. One sample shall be taken for each test run. Total mercury content shall be determined using **EPA Method 7471A** (Soils) or **EPA Method 7470** (Liquids). The analysis shall determine the mercury content (in parts per billion, or at elevated concentrations of parts per million) of the material processed by the thermal unit.

Any emission limit exceeded at the time of the source test must be reported within 24 hours to the NMCP as required by **NAC 445B.232**. Any emission limit exceedance revealed by a source test report, pursuant to testing, must be reported within 24 hours after ***(company-facility)*** receives the source test report. Emissions exceedances will be evaluated in accordance with the Air Quality regulations and may result in a Notice of Alleged Air Quality Violation and Order (NOAV). Failure to properly report an exceedance of a permitted emissions limit is also subject to a potential NOAV.

The Protocol identifies the following units for testing at the following material production rates:

1) thermal unit, proposed material throughput or batch weight
2) thermal unit, proposed material throughput or batch weight
3) thermal unit, proposed material throughput or batch weight

This is where you identify any proposed deviations to Method 29, special requests by the facility, or anything else that needs noted…

The NMCP requires submittal of a complete test report in accordance with **NAC 445B.232 "Testing and sampling"**. When submitting the source test data, ensure that the System Number and Thermal Unit Number identify the emission unit as specified in the MOPTC. Please refer (***testing company***) to the **Source Test Report Format** (attached) for the reporting requirements and the required report format. The NMCP reserves the right to have (***company***) resubmit the test report if the guidelines are not met. Test reports must be submitted to the NMCP within 60 days of the conclusion of the tests.

The NMCP may reject emissions tests or request resubmittal of the test report for any of the following reasons:

1) Failure to comply with all provisions of NAC 445B.232 and NAC 445B.252.
2) Any deviation from the U.S. EPA Reference Methods unless specifically approved by the NMCP.
3) Failure to verify the absence of cyclonic flow.
4) Failure to achieve isokinetics sampling rates for any of the three required test runs.
5) Failure to provide relevant process and production information; including, but not limited to material throughput rate or batch weight, for the period of each test run.
6) Failure to achieve the operating conditions specified in the MOPTC or approved in advance in the test protocol during each test run.
7) Failure to include signatures certifying the truth and accuracy pursuant to **NAC 445B.252.8** (Testing Team Leader, Testing Company Reviewer, Facility Representative. and Laboratory).
8) Failure to include hand-written field data sheets in final report.
9) Failure to provide electronic EXCEL spreadsheet(s) containing the data collected during each particulate matter source test run

The NMCP requires the following submissions:

1) One printed copy of the completed source test report,
2) A summary sheet for each tested source on the *"NMCP Source Test Summary"* form, including all source test results, and
3) A compact disk(s) containing the complete text of the report (analysis, raw data, diagrams, etc.) in electronic PDF format and electronic EXCEL spreadsheet(s) containing the data collected during each particulate matter source test run. A copy of the required EXCEL spreadsheet is attached; please call the NMCP to obtain an electronic version.

Testing is scheduled to be conducted on Month xx through Month xx, 20xx. Because of the duration of the test program, please notify this office at least 24 hours in advance of any changes to the test dates. NMCP staff may be present for the testing.

If you have any questions, please call (*You, writing this letter*), of my staff, at 775-687-xxxx or myself at 775-687-9330.

Sincerely,

Rob Bamford
Supervisor, NMCP
Bureau of Air Quality Planning

RB/(***your initials***)

Enclosure: Source Test Report Format
PM Source Test Data Template

Cc w/Enclosure: testing firm contact

Cc w/o Enclosure: Files (A0xxx)

Route to w/o enc.: Michael Elges, NDEP
Greg Remer, NDEP
Larry Kennedy, NDEP
Matt DeBurle, NDEP
Francisco Vega, NDEP

Certified Mail No. xxxx xxxx xxxx xxxx xxxx