

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**

March 16, 2011

Rawhide Mining, LLC – Denton Rawhide Mine has submitted an existing 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 an existing carbon kiln, electrowinning circuit, induction furnace, and a mercury retort.

The applicable facility, located in air shed basin #122, in Mineral County is:

*Rawhide Mining, LLC
P.O. Box 2070
Fallon, NV 89407*

The NDEP-BAPC has reviewed the application and has made a preliminary determination to issue the MOPTC. The draft MOPTC consists of a carbon kiln, electrowinning circuit, induction furnace, and a mercury retort, each with an emission 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 each unit.

Final NvMACT mercury emissions performance limit for the kiln and retort systems is: 1.0×10^{-4} gr/dscf mercury, the emission limit for the electrowinning system is 5×10^{-5} gr/dscf mercury, and the emission limit for the furnace is 1.0×10^{-5} gr/dscf mercury. Determination of proposed NvMACT mercury emissions control technology for the systems are determined to be: a chilled condenser and carbon filter for the carbon kiln and electrowinning systems; a chilled condenser, carbon filter, and baghouse for the furnace; and a chilled condenser with a primary carbon bed followed by a secondary carbon bed for the mercury retort.

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 Rawhide Mining, 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>