



# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

*Jim Gibbons, Governor*

*Allen Biaggi, Director*

*Leo M. Drozdoff, P.E., Administrator*

## **Nevada Mercury Control Program** Annual Emissions Reporting May 6, 2008

The Bureau of Air Quality Planning (BAQP) and the Bureau of Air Pollution Control (BAPC) provide the following requirements for Annual Emissions Reporting (AER) under the Nevada Mercury Control Program (NMCP) beginning reporting year 2007:

1. The BAPC/BAQP has established that US EPA Reference Test Method 29 (M29) is currently the only acceptable test method to demonstrate compliance and report annual emissions. Other methods may be approved by the BAPC/BAQP for specific applications upon request.

A. The Ontario Hydro Method (OHM) is for speciation purposes only.

B. Method 101A has been superseded by M29.

C. Method 30B utilizes a very small exhaust gas sample and was designed for the much lower mercury concentration levels typically found in coal-fired boiler exhaust gas streams. There is not currently sufficient data to support Method 30B, as a representative test method for the NMCP.

2. Only BAPC/BAQP-approved M29 tests may be used. If multiple BAPC/BAQP approved M29 tests are performed, each test run must be utilized to generate an average emission rate. No dropping or picking out test runs across a test event or multiple test events is allowed. If the BAPC/BAQP deems the test(s) valid, then all test runs are to be included.

3. All reported values will be stated in lbs/hr.

4. Emission values may not be “scaled.” The BAPC/BAQP recognizes that facilities may be required to demonstrate compliance with a permitted production rate higher than “typical” operations; however, there is insufficient data to support that throughput and control efficiency have direct, linear relationships to emission rates. A facility may establish a separate mercury emissions factor for a “typical throughput rate” which is lower than a permitted throughput rate with an additional BAPC/BAQP-approved M29 test. The lower throughput rate emission factor will be used only for annual emissions reporting requirements; not compliance demonstration.

5. The BAPC/BAQP has the authority to potentially discard flawed test values during the source test report review. Values will be discarded only on the basis of an invalidated test run; not statistical variability.