

Dear Sirs,

In respect to the requirements of Minamata Convention on Mercury and the public consultations on BAT/BEP Draft Guidance on Cement Clinker Production Facilities, please find below the comments of Zlatna Panega Cement team:

1. We think that BAT associated performance level of 0,03 mg Hg/Nm³ as average daily value or as a value over the sampling period is not representative and easily could be exceeded even from installation which usually have low Hg emissions – once because of the variation in raw materials and fuels and also because of the different kiln working modes and conditions. These situation could be avoided taking longer average period for reporting of Hg emissions. Additionally the current ELV according to the European legislation is 0,05 mg Hg/Nm³.
2. Possible solution is also the option each country to decide on its own ELV based on the local plants specificities as it was decided for the other sources of Hg emissions without giving recommended associated ELV in the guidance.
3. This low ELV for a short average period could lead to big investments in Hg emissions abatement equipment without any stable evidences that emissions would be reduced to the required levels.
4. Monitoring of Hg emissions required on a yearly basis gives two options – continuous measurement on the stacks or mass balance method. As continuous monitoring analyzers are usually expensive and require huge efforts regarding maintenance and operational control it would be most appropriate usage of mass balance approach.

Best regards,

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