

In answer to monitoring questions posed by Ameren before the January 31 meeting:

Several questions were raised about the method for measuring input mercury. Within the draft rule handed out last week, ASTM D6414-01 was listed as the appropriate method to measure the mercury content of coal. From discussions with experts in coal sampling and analysis, it is the Agency's understanding that D6414-01 is the best and most accurate method for this purpose. While there is also a direct combustion method, ASTM D6722-01, the Agency has been told it is more difficult, more costly, and has presented some problems with Eastern bituminous coals.

There were also several other ASTM methods listed for obtaining an appropriate coal sample. These were obtained from 40 CFR 63, Subpart DDDDD, fuel analysis requirements, as a starting point for further discussion. Other possible methods for obtaining a representative sample include those found in Reference Method 19, 40 CFR 60 Appendix A, which is used to determine the sulfur in coal. However, the Agency recognizes that utilities are already doing coal sampling for other purposes. Therefore, if industry has other suggestions for how to obtain a representative sample, the Agency is willing to work with you and consider alternatives to that portion of the rule. The Agency does agree with Ameren that mercury content can vary somewhat, which is why the rule requires daily testing and why it is important to obtain a representative sample.

As for the outlet testing of mercury emissions, the Illinois rule uses essentially the same monitoring as CAMR, and thus the Agency would refer people to USEPA's technical support for most details.