

Mercury Monitoring Suggestions

- 1) All effluent monitoring for mercury should be low-level. This is for majors - with and without a pretreatment program - and minors that have effluent mercury monitoring.
- 2) Majors with a pretreatment program should have influent metals monitoring, and mercury should be low-level.
- 3) Any permit where we've granted a variance for mercury must have low level influent and effluent monitoring.
- 4) Any other permit that for some reason includes influent mercury monitoring - it should be low-level.
- 5) For majors and minors that do not typically have influent metals monitoring, it's reasonable not to include low-level influent monitoring UNLESS we're granting variance coverage or there is some other special circumstance. For many of these facilities, we know that they'll likely be able to meet 12 ng/l limits. But, they need to know that if they decide to apply for variance coverage, they'll need at least two low-level influent data points as part of their application.

In the Lake Erie basin, I would say that if you have low-level effluent monitoring for mercury, you should include low-level influent monitoring, too. Not many facilities will be able to meet 1.3 ng/l after the mixing zone phase out, and a variance is probably in their future.

Gary

[2009 email from Gary Stuhlfauth]