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EPA Docket Center
U.S. Environmental Protection Agency
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Washington, DC 20460.

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The Coalition for Responsible Waste Incineration (CRWI) appreciates the opportunity to submit comments on *Revisions to Test Methods and Testing Regulations; Proposed rule. 77 FR 1,130 (January 9, 2012)*. CRWI is a trade association comprised of 23 members. Most of these members use Methods 5, 23, 26, and 29. CRWI has one general comment on the use of mercury-free equipment and a number of specific comments (attached).

Thank you for the opportunity to comment on this proposed rule. If you have any questions, please contact me at (703-431-7343 or mel@crwi.org).

Sincerely yours,

Melvin E. Keener, Ph.D.
Executive Director

cc: CRWI members
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Specific Comments

1. CRWI supports the use of mercury-free equipment in every method where it is practical. There are a number of mercury-free instruments that are as accurate or are more accurate than are the mercury-based instruments. We believe that allowing the use of mercury-free equipment can improve the safety of the personnel conducting the tests without compromising the quality of the data collected. It also reduces the potential for spills and subsequent clean up.
2. In item 25 (EPA method 2, 77 Fed. Reg. 1130, 1151) EPA adds a new term to Section 12.1 for $T_{s(abavg)}$. However, this term does not appear to be used in any of the unmodified equations in Method 2 or the modified equations in the proposed rule. In addition, the proposal includes a supposedly modified Equation 2-8. However, this is the same equation as the current equation codified in the October 17, 2000 Federal Register notice. We suspect the proposed new term for $T_{s(abavg)}$ was supposed to be added to Equations 2-7 and/or 2-8. We suggest the Agency determine if Equation 2-7 and/or 2-8 needs to be modified. If not, we see no reason to include a definition that is not used.
3. In item 30 (EPA Method 4, 77 Fed. Reg. at 1152), EPA is adding a definition of B_A but it is unclear if the equation that follows the definition actually defines the term. If it does, we suggest that the equation should have " $B_A =$ " in it. Also, the parentheses and bracket for this equation are not in the correct order. In addition, the Agency defines the terms %RH and P_{Bar} but these are not used in any of the equations in Section 16.0. CRWI suggests that if these terms are not being used, they should not be included.
4. In item 31 (EPA Method 5, 77 Fed. Reg. at 1153), EPA added a reference but it does not appear to be complete. We suggest that EPA include sufficient information in the reference so others can find it.
5. In item 48 (EPA Method 18, 77 Fed. Reg. at 1159), "equivalent" is misspelled in the title to Figure 18-3.
6. In item 65 (Part 60, Appendix F, Procedure 2, 77 Fed. Reg. at 1164), EPA defines four terms. The "and" is between the second and third term instead of between the third and fourth. In addition, the definition of the last term (FS) for Equation 2-3 is not included. CRWI suggest that these "typo" should be corrected.
7. In item 82 (40 CFR 63.8(f)(6)(iii), 77 Fed. Reg. at 1167), EPA states they are adding a sentence at the end of this paragraph. A very similar sentence already exists except that the existing sentence points to Section 7 of Performance Specification 2. We think that EPA intends to modify the sentence to point to Section 8.4 instead of adding a new sentence. We suggest EPA check this reference to make sure this is what was intended and make the appropriate corrections.