

**Table 1: Annual Respondent Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants
(40 CFR Part 63, Subpart IIII) (Renewal)**

INFORMATION COLLECTION ACTIVITY	(A) RESPONDENT LABOR HOURS PER OCCURENCE PER LABOR CATEGORY			(B) NUMBER OF OCCURENCES PER RESPONDENT PER YEAR	(C) NUMBER OF RESPONDENTS	(D) RESPONDENT HOURS PER YEAR	(E) RESPONDENT LABOR COSTS PER LABOR CATEGORY PER YEAR (AXBXCX RATE)			(F) RESPONDENT LABOR COSTS PER YEAR
	Mgmt @\$114.77	Technical @\$97.59	Clerical @\$48.26				Mgmt @\$114.77	Technical @\$97.59	Clerical @\$48.26	
1. REQUIRED MONITORING, INSPECTIONS, AND RECORDKEEPING										
a. Read rule and instructions (a)	20	32	0	1	0	0	\$0	\$0	\$0	\$0
b. Prepare Startup/Shutdown/Malfunction Plan (a)	8	32	4	1	0	0	\$0	\$0	\$0	\$0
c. Prepare Washdown Plan (a)	4	16	4	1	0	0	\$0	\$0	\$0	\$0
d. Prepare site-specific monitoring plan (a)	4	32	4	1	0	0	\$0	\$0	\$0	\$0
e. Record date/time of washdowns	0	0.1	0	365	9	328.5	\$0	\$32,058	\$0	\$32,058
f. Measure cell room mercury vapor level and record data	0	0.5	0	365	9	1642.5	\$0	\$160,292	\$0	\$160,292
g. Monitor vent mercury concentration and record CMS data, daily averages, and deviations	0	0.5	0	365	9	1642.5	\$0	\$160,292	\$0	\$160,292
h. Perform vent mercury concentration CMS inspections and calibration checks and record results	0	8	0	2	9	144	\$0	\$14,053	\$0	\$14,053
i. Perform twice daily inspections (for vessels and process equipment problems, hydrogen and/or mercury vapor leaks at decomposers and hydrogen piping up to the hydrogen header) and record information	0	0.75	0	730	9	4927.5	\$0	\$480,875	\$0	\$480,875
j. Inspect cell room floors for cracks, spalling, or other deficiencies and record information	0	2	0	12	9	216	\$0	\$21,079	\$0	\$21,079
k. Inspect pillars and beams for cracks, spalling, and other deficiencies and record information	0	8	0	2	9	144	\$0	\$14,053	\$0	\$14,053
l. Perform daily cell room inspections (for caustic leaks in caustic system equipment and piping, liquid mercury spills or accumulations on floors and surfaces, for liquid mercury leaks from vessels, piping, and equipment in liquid mercury service) and record information	0	1.25	0	365	9	4106.25	\$0	\$400,729	\$0	\$400,729

m. Inspect equipment and piping in the hydrogen system from the header to the last control device for hydrogen and/or mercury vapor leaks and record information on these leaks	0	4	0	4	9	144	\$0	\$14,053	\$0	\$14,053
n. Record information on handling and storage of mercury-containing waste	0	0.25	0	365	9	821.25	\$0	\$80,146	\$0	\$80,146
o. Record the mass of virgin mercury added to cells.	0	0.25	0	2	9	4.5	\$0	\$439	\$0	\$439
Recordkeeping Subtotal:						14,121				\$1,378,068
2. REQUIRED REPORTING										
a. Read rule and instructions (a)	-----Included in 1a-----									
b. Initial Notifications (a)	4	0	2	1	0	0	\$0	\$0	\$0	\$0
c. Notification of Intent to conduct a performance test (a)	2	0	1	1	0	0	\$0	\$0	\$0	\$0
d. Notification of Compliance Status (a)	8	16	4	1	0	0	\$0	\$0	\$0	\$0
e. Startup, Shutdown, and Malfunction	8	16	4	0	0	0	\$0	\$0	\$0	\$0
f. Semiannual Compliance Reports	4	16	4	2	9	432	\$8,263	\$28,106	\$3,475	\$39,844
Reporting Subtotal:						432				\$39,844
TOTAL						14,553				\$1,417,912

Note:

(a) A one-time activity for each plant.

**Table 2: Annual Agency Burden and Cost, NESHAP for Mercury Cell Chlor-Alkali Plants
(40 CFR Part 63, Subpart IIII) (Renewal)**

ACTIVITY	(A) EPA LABOR HOURS PER OCCURENCE PER LABOR CATEGORY			(B) NUMBER OF OCCURENCES PER RESPONDENT PER YEAR	(C) NUMBER OF RESPONDENTS PER YEAR	(D) EPA HOURS PER YEAR	(E) EPA LABOR COSTS PER LABOR CATEGORY PER YEAR (AXBXC X RATE)			(F) EPA COSTS PER YEAR
	Mgmt @ \$61.36	Technical @\$45.52	Clerical @\$24.64				Mgmt @\$61.36	Technical @\$45.52	Clerical @\$24.64	
a. Review Initial Notification	1	4	0	1	0	0	\$0	\$0	\$0	\$0
b. Review Notification of Intent to conduct a performance test	1	4	0	3	0	0	\$0	\$0	\$0	\$0
c. Observe performance tests	0	16	0	3	0	0	\$0	\$0	\$0	\$0
d. Review Notification of Compliance Status (including site-specific monitoring plans and operation & maintenance plans) (a)	4	32	0	1	0	0	\$0	\$0	\$0	\$0
e. Review performance test reports (a)	1	8	0	1	0	0	\$0	\$0	\$0	\$0
f. Review semiannual compliance reports	1	12	0	2	9	234	\$1,104	\$9,832	\$0	\$10,937
TOTAL						234				\$10,937

Note:

(a) A one-time activity for each plant.