

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal), EPA ICR Number 2383.03, OMB Control Number 2060-0659.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gold Mine Ore Processing were proposed on April 28, 2010 (75 FR 22470) and promulgated on February 17, 2011 (76 FR 13514). These regulations apply to existing and new gold mine ore processing and production facilities that use ore pretreatment, carbon processes with mercury retorts, carbon processes without mercury retorts, and non-carbon concentrate processes. The regulation sets mercury emission limits for each of the affected processes at new and existing facilities. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart EEEEEEE.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 21 respondents per year will be subject to these standards. We expect all existing respondents have already complied with initial requirements, and that no new respondents per year will become subject to these same standards.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

The “Affected Public” are owners and operators of gold ore processing and production facilities, which extract gold from mined ore. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gold Mine Ore

Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, mercury emissions from gold ore processing and production facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart EEEEEEE.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test, a record of the operating parameters (under which compliance was achieved) may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart EEEEEEE.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (78 FR 35023) on June 11, 2013. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as it was being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Nevada Mining Association, at john.barber@goldcorp.com, 303-674-9400; and 2) the Counsel for Barrick Gold Corporation,

at mbarbanell@barrick.com, 416-307-3502.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of gold ore processing and production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 1041, which corresponds to the North American Industry Classification System (NAICS) code 212221 for Gold Ore Mining.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE).

A source must make the following reports:

Notifications	
Notification of applicability	63.9(b)(2), 63.11648(a)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(c)
Notification of opacity observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.9(h)(1)
Notification of changes in information	63.9(j)

Reports	
Malfunction reports	63.11648(d)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan/report	63.8(e)
Compliance report if deviation occurs	63.11648(c), 63.10(e)(3)
Annual performance test for mercury emissions	63.11646(a-b), 63.7

A source must keep the following records:

Recordkeeping	
Records to support notifications	63.11648(e)(1),63.10(b)(2)
Records of monitoring data	63.11648(e)(2)
Records of monthly ore and concentrate throughput, operating hour for each process unit	63.11648(e)(3)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous monitoring device for mercury.
Perform initial performance test, Reference Method 29 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.

Respondent Activities
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards (note the operating conditions under which compliance was achieved). Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for: problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation. A small entity for this industry is defined as: (1) a small business whose parent company meets the Small Business Administration size standards for small businesses found at 13 CFR 121.201 (less than 500 employees for gold mine ore processing facilities); (2) a small, governmental jurisdiction that is a government of a city, county, town, school district, or special district with a population of less than 50,000; and (3) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field.

Although these standards will not affect any small entities, EPA nonetheless has tried to reduce the impact of this final rule on all of the affected sources. The standards include parametric monitoring requirements for mercury emission control devices that are common throughout the industry and in many cases are already required by State operating permits. The standards also require only the essential monitoring, recordkeeping, and reporting needed to verify compliance.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 below documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,358 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Monitoring equipment ¹	\$9,085	0	\$0	\$0	\$0	\$0
Method 29 Hg stack sampling ²	NA	NA	NA	\$9,420	17	\$160,140
Material and supply ³	NA	NA	NA	\$3,190	21	\$66,990
Total			\$0			\$227,130

¹ Annualized installed capital cost is \$190,790 per year based on a capital recovery factor of 0.1424 (10 year life at 7%), and a total installed capital cost of \$1.34 million for monitoring equipment. We assume no new sources will become subject over the three-year period of this ICR.

² Annualized cost for Method 29 stack sampling for mercury on 17 process units outside of Nevada.

³ O&M costs are for materials and supplies (e.g., sorbent trap tubes, calibration standards) estimated as 5% of the installed capital cost (\$1.34 million).

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$227,130. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$227,130. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$2,146.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2013 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 21 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 21 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	21	0	0	21
2	0	21	0	0	21
3	0	21	0	0	21
Average	0	21	0	0	21

¹ New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 21.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification of applicability	0	1	0	0
Initial notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Test plan	0	1	0	0
QA plan for CEMS	0	1	0	0
Startup, shutdown, and malfunction (SSM) plan	0	1	0	0
Annual performance test for Hg emissions ¹	17	1	0	17
Semiannual reports of excess emissions ²	4.2	2	0	8.4
			Total	25.4

¹ Method 29 stack sampling for mercury on 17 process units outside of Nevada. Facilities in Nevada already perform annual sampling and analysis for mercury; consequently, those facilities will not incur any additional stack testing burden under this rule.

² We assume 20% of the 21 facilities will have excess emissions reports.

The number of Total Annual Responses is 25 (rounded).

The total annual labor costs are \$217,994. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,358 hours at a cost of \$217,994. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 94 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$227,130. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 48 labor hours at a cost of \$2,146. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the respondent burden and a decrease in Agency burden. In addition, there is a decrease in total capital and O&M costs. This is not due to any program changes. The changes in the burden and cost estimates occurred because the standards have been in effect for more than three years and the requirements are different during the initial compliance period for new facilities, as compared to the on-going compliance period for existing facilities. The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes purchasing monitoring equipment, preparing initial notification reports, and establishing recordkeeping systems.

This ICR, by in large, reflects the on-going burden and costs for existing facilities. Activities for existing source include continuously monitoring of mercury and the submission of annual and semiannual reports.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 94 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0317. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0317 and OMB Control Number 2060-0659 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent	Person-hours per respondent per year (C=A*B)	Respondents per year	Technical person-hours per year (E=C*D)	Management person-hours per year (E*0.05)	Clerical person-hours per year (E*0.1)	Total Cost per year ^a , \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions ^b	8	1	8	0	0	0	0	\$0
B. Required activities ^c	N/A							
Operating CEMS ^d	0.25	365	91.25	4	365	18.25	36.5	\$41,058.85
Weekly and monthly sampling	1	52	52	17	884	44.2	88.4	\$99,441.17
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability ^b	2	1	2	0	0	0	0	\$0
Notification of compliance status ^b	2	1	2	0	0	0	0	\$0
Request for compliance extension	N/A							
Site-specific test plan ^b	4	1	4	0	0	0	0	\$0
Quality assurance plan for CEMS ^d	8	1	8	0	0	0	0	\$0
Notification of performance test ^b	2	1	2	0	0	0	0	\$0
Startup, shutdown, malfunction plan ^b	4	1	4	0	0	0	0	\$0
Annual performance test for Hg emissions	8	1	8	17	136	6.8	13.6	\$15,298.65
Semiannual report of excess emissions	8	2	16	4.2	67.2	3.36	6.72	\$7,559.24
Subtotal for Reporting Requirements						1,670.03		\$163,357.91

5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D Develop record system	4	1	4	0	0	0	0	\$0
E. Time to enter information	0.5	52	26	21	546	27.3	54.6	\$49,843.28
F. Time to transmit or disclose information	0.25	2	0.5	21	10.5	0.53	1.05	\$958.52
G. Time to adjust existing ways	2	1	2	21	42	2.1	4.2	\$3,834.10
F. Time to train personnel	4	1	4	0	0	0	0	\$0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						688.28		\$54,635.90
TOTAL LABOR BURDEN AND COST (rounded)						2,358		\$217,994

Assumptions:

^a This ICR uses the following labor rates based on Department of Labor, Bureau of Labor Statistics (BLS) data "Table 2 Civilian Workers, by Occupational and Industry group. -- \$102.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. The wages have been adjusted to account for an overhead rate of 110 percent.

^b Assumes 21 existing facilities have already complied with initial rule requirements during the previous ICR period.

^c Rule will require operating CEMS, weekly sampling, and monthly sampling.

^d Assumes 4 roaster stacks will be equipped with mercury CEMS, and that QA plan has already been developed during initial rule compliance.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Gold Mine Ore Processing (40 CFR Part 63, Subpart EEEEEEE) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)
	Person hours per occurrence	Occurrences per respondent	Plants per year	Technical hours/year (D=A*B*C)	Management hours/year (E=0.05*D)	Clerical-hours/year (F=0.1*D)	Total Cost per year ^a , \$
Observe performance test ^b	16	1	1	16	0.8	1.6	\$829.19
Report Review:							
Initial notification of applicability ^c	1	1	0	0	0	0	\$0
Notification of compliance status ^c	2	1	0	0	0	0	\$0
Notification of performance test ^c	2	1	0	0	0	0	\$0
Deviation reports	N/A						
Startup, shutdown, malfunction plan ^c	2	1	0	0	0	0	\$0
Semiannual excess emissions report ^d	1	2	4.2	8.4	0.42	0.84	\$435.33
Annual performance test report for Hg emission	1	1	17	17	0.85	1.7	\$881.02
TOTAL ANNUAL BURDEN AND COST (rounded)				48			\$2,146

Assumptions:

^a These rates were obtained from Salary Table 2013-GS available on the OPM website.

^b Assumes Agency staff will observe the performance test of one affected plant per year.

^c Assumes 21 existing gold mine ore processing facilities have already complied with initial rule requirements.

^d Assume 20% of existing facilities (21 x 20% = 4.2 facilities) will need to submit excess emissions reports.