

Table 1: Annual Respondent Burden and Cost – NESHAP for Mercury (40 CFR Part 61, Subpart

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements ^c	1	1	1	107
B. Required activities for New Sources				
Initial performance test ^d	24	1	24	0
Repeat performance test ^e	24	0.2	4.8	0
C. Create information	See 3B			
D. Gather existing information	See 3B			
E. Write reports				
New Sources				
Notification of construction/reconstruction ^f	2	1	2	0
Notification of initial startup ^g	2	1	2	0
Notification of actual startup ^g	2	1	2	0
Report of initial performance test				
Notification of initial performance test	2	1	2	0
Existing Sources				
Report of annual emission test ^h	12	1	12	100
Submit semiannual report ⁱ	8	2	16	7
Notification of parameter excursions ^j	4	2	8	7
<i>Subtotal for Reporting Requirements</i>				
4. Recordkeeping requirements				
A. Familiarization with regulatory requirements	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system				
Record operating parameters ^k	0.25	365	91.25	107
Record mercury leaks ^l	0.25	365	91.25	7
Record monitored parameters ^l	0.5	365	182.5	7
Compile data for semiannual reports ^m	8	2	16	7
Maintain data on mercury leaks ⁿ	0.5	52	26	7
Maintain data on monitored parameters ⁿ	0.5	52	26	7

E. Time to enter information				
Records of startup, shutdown, and malfunction ^o	1.5	53.5	80.25	53.5
F. Audits	N/A			
<i>Subtotal for Recordkeeping Requirements</i>				
TOTAL LABOR BURDEN AND COSTS (rounded) ^p				
TOTAL CAPITAL AND O&M COST (rounded) ^p				
GRAND TOTAL (rounded) ^p				

Assumptions:

^a We have assumed that there are approximately 107 existing sources currently subject to this rule. There will be no addition; three-year period of this ICR.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017 “Table 2. Civilian” from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available.

^c We have assumed that it will take 1 hour for existing respondents to refamiliarize themselves with rule requirements.

^d We have assumed that it will take each new respondent 24 hours to complete initial performance test. Since there are no new respondents, this assumption is not applicable.

^e We have assumed that 20 percent of new respondents will repeat the performance test due to failure. Since there are no new respondents, this assumption is not applicable.

^f We have assumed that each new respondent will take two hours to write notification reports on construction/reconstruction projects.

^g We have assumed that it will take each new respondent two hours each to write notification reports on initial startup and annual emission tests.

^h We have assumed that 100 of the existing respondents will take 12 hours to write reports on the annual emission tests.

ⁱ We have assumed that seven of the existing respondents will each have to submit semiannual reports.

^j We have assumed that seven of the existing respondents will write notification reports on parameter excursions two times per year.

^k We have assumed that all respondents will record operating parameters 365 days per year.

^l We have assumed that seven respondents will each have to record mercury leaks and monitored parameters.

^m We have assumed that seven respondents will each take eight hours to compile data for semiannual reports.

ⁿ We have assumed that each of the seven respondents will have to maintain data on mercury leaks and monitored parameters.

^o We have assumed that 50 percent of the respondents will each take 1.5 hours to record information of startup, shutdown, and malfunction.

^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

t E) (Renewal)

(E) Technical person hr/yr (E=CxD)	(F) Management person hr/yr (Ex0.05)	(G) Clerical person hr/yr (Ex0.1)	(H) Total Cost Per year ^b
107	5.35	10.7	\$13,474.36
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1,200	60	120	\$151,114.32
112	5.6	11.2	\$14,104.00
56	2.8	5.6	\$7,052.00
1,696			\$185,745
9,763.75	488.19	976.38	\$1,229,535.37
638.75	31.94	63.88	\$80,436.89
1,277.5	63.88	127.75	\$160,873.79
112	5.6	11.2	\$14,104.00
182	9.1	18.2	\$22,919.01
182	9.1	18.2	\$22,919.01

Tech	\$112.98
Mgmt	\$149.35
Cler	\$54.81

Respondant Rates

(Source: United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Civilian Workers, by occupational and industry group.")

<u>Labor Type</u>	<u>Total Compensation</u> (\$/hr)	<u>Rate</u> (Rate +)
Mgmt.	\$71.12	\$149.35
Tech.	\$53.80	\$112.98
Cler.	\$26.10	\$54.81

Hours per Response	
20600	# hours
128	# responses
161	hr/resp

4,293.38	214.67	429.34	\$540,658.70
18,917			\$2,071,447
20,600			\$2,260,000
			\$0
			\$2,260,000

al new source that will become subject to the rule over the

er hour for Technical labor, and \$54.81 per hour for Clerical Workers, by occupational and industry group.” The rates are lable to those employed by private industry.

w respondents estimated, this requirement does not apply.

r respondents estimated, this requirement does not apply.

. Since there are no new respondents estimated, this requirement does not apply.

tual startup. Since there are no new respondents estimated, this requirement does not apply.

er year.

52 times per year.

id malfunctions.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Mercury (40 CFR Part 61, Subpa

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person hr/yr (E=CxD)	(F) Management person hr/yr (Ex0.05)
Required activities						
New Plants						
Initial performance test ^c	24	1	24	0	0	0
Repeat initial performance test ^{c, d}	24	0.2	4.8	0	0	0
Report Review						
New Plants						
Notification of construction ^e	0.5	1	0.5	0	0	0
Notification of initial startup ^e	0.5	1	0.5	0	0	0
Notification of actual startup ^e	0.5	1	0.5	0	0	0
Notification of initial test ^e	0.5	1	0.5	0	0	0
Review test results ^f	8	1.2	9.6	0	0	0
Existing Plants						
Annual emission test	4	1	4	100	400	20
Review semiannual reports ^g	8	2	16	7	112	5.6
Review notification on monitored parameters ^h	8	2	16	7	112	5.6
TOTAL ANNUAL BURDEN AND COST ⁱ						718

^a We have assumed that there are approximately 107 existing sources currently subject to this rule. There will be no addition to the rule over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Managerial (GS-13, Step 5), \$48.08 for Technical (GS-12, Step 1), and \$26.02 Clerical (GS-6, Step 3). These rates are from (OPM) "2017 General Schedule" which excludes locality rates of pay.

^c We have assumed that the Agency will take 24 hours to participate in the performance tests. It is assumed that all initial per existing respondents. Since there are no new respondents estimated, this requirement does not apply.

^d We have assumed that 20 percent of new respondents will have to repeat the performance tests due to failure. Since there ar

^e We have assumed that it will take 0.5 hours for the Agency to review notification reports for each respondent. Since there a

^f We have assumed that it will take 8 hours for the Agency to review test results for each respondent. Since there are no new

^g We have assumed that seven of the existing respondents will each have to submit semiannual reports, and the Agency will t review each report.

^h We have assumed that seven respondents will each have to record mercury leaks and monitored parameters, and the Agency each notification.

ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

rt E) (Renewal)

(G) Clerical person hr/yr (Ex0.1)	(H) Cost, \$ ^b
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
40	\$21,568.64
11.2	\$6,039.22
11.2	\$6,039.22
	\$33,600

Tech	\$48.08
Mgmt	\$64.80
Cler	\$26.02

Agency Rates

Source: Office of Personnel Management (OPM), 2017 General Schedule

	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	30.05	\$48.08
(GS- 13, step 5) - Mgmt.	40.5	\$64.80
(GS-6, step 3) - Cler.	16.26	\$26.02

ial new sources that will become subject

ment overhead expenses: \$64.80 for
the Office of Personnel Management

formance tests have been completed by

re no new respondents estimated, this requirement does not apply.

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respondents estimated, this requirement does not apply.

ake eight hours two times per year to

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