

Table 1: Annual Respondent Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 63, S

117.92

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical hours per year (E=CxD)
1. Reporting requirements					
a. Familiarize with regulatory requirements ^c	32	1	32	2	64
b. Prepare startup/shutdown/ malfunction plan ^d	32	1	32	0	0
c. Prepare washdown plan ^d	16	1	16	0	0
d. Prepare site-specific monitoring plan ^d	32	1	32	0	0
e. Record date/time of washdowns ^e	0.1	365	36.5	2	73
f. Measure cell room mercury vapor level and record data ^e	0.5	365	182.5	2	365
g. Monitor vent mercury concentration and record CMS data, daily averages, and deviations ^e	0.5	365	182.5	2	365
h. Perform vent mercury concentration CMS inspections and calibration checks and record results	8	2	16	2	32
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 ^f	0.75	730	547.5	2	1,095
j. Inspect cell room floors for cracks, spalling, or other deficiencies and record information ^g	2	12	24	2	48
k. Inspect pillars and beams for cracks, spalling, and other deficiencies and record information	8	2	16	2	32
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 ^e	1.25	365	456.25	2	912.5
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	4	4	16	2	32
n. Record information on handling and storage of mercury-containing waste ^e	0.25	365	91.25	2	182.5

o. Record the mass of virgin mercury added to cells ⁱ	0.25	2	0.5	2	1
Subtotal for Reporting Requirements					
2. Recordkeeping requirements					
a. Familiarize with regulatory requirements ^c	See 1A				
b. Initial notifications ^d	6	1	6	0	0
c. Notification of intent to conduct a performance test ^d	3	1	3	0	0
d. Notification of compliance status ^d	16	1	16	0	0
e. Startup, shutdown, and malfunction	16	0	0	0	0
f. Semiannual compliance reports ⁱ	16	2	32	2	64
Subtotal for Recordkeeping Requirements					
TOTAL ANNUAL BURDEN AND COST (rounded)^j					
TOTAL CAPITAL AND O&M COSTS (rounded)^j					
GRAND TOTAL (rounded)^j					

Assumptions:

- ^a We have assumed that there are approximately 2 respondents subject to the rule, with no new sources expected over the ne
- ^b This ICR uses the following labor rates: Technical \$117.92 (\$56.15 + 110%); Managerial \$147.40 (\$70.19 + 110%); and C are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by occu from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages av This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical ho
- ^c We assume all respondents will have to familiarize themselves with regulatory requirements each year.
- ^d We assume that this is a one-time only activity for new facilities.
- ^e We have assume that information should be recorded 365 days per year.
- ^f We have assumed that inspections should be performed two times per day for a total of 730 times per year.
- ^g We have assumed that inspections should be done and recorded once per month.
- ^h We have assumed that it will take 0.25 hours two times per year to record information.
- ⁱ We have assumed that it will take each respondent 16 hours to two times per year to complete semiannual compliance repc
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Subpart IIIII) (Renewal)

147.4 57.02

(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^b
3.2	6.4	\$8,383.49
0	0	\$0
0	0	\$0
0	0	\$0
3.65	7.3	\$9,562.42
18.25	36.5	\$47,812.08
18.25	36.5	\$47,812.08
1.6	3.2	\$4,191.74
54.75	109.5	\$143,436.24
2.4	4.8	\$6,287.62
1.6	3.2	\$4,191.74
45.63	91.25	\$119,530.20
1.6	3.2	\$4,191.74
9.13	18.25	\$23,906.04

0.05	0.1	\$130.99
3,682		\$419,436
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
3.2	6.4	\$8,383.49
74		\$8,383
3,760		\$428,000
		\$16,400
		\$444,000

940 hrs per response

xt three-years of this ICR.

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Table 2: Average Annual EPA Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants (40 Cl

Burden Item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a
a. Review Initial Notification ^c	4	1	4	0
b. Review Notification of intent to conduct a performance test ^c	4	3	12	0
c. Observe performance tests ^c	16	3	48	0
d. Review Notification of Compliance Status (including site-specific monitoring plans and operation & maintenance plans) ^c	32	1	32	0
e. Review performance test reports ^c	8	1	8	0
f. Review semiannual compliance reports ^d	12	2	24	2
TOTAL ANNUAL BURDEN AND COST (rounded) ^e				

Assumptions:

^a We have assumed that there are approximately 2 respondents subject to the rule, with no new sources expected.

^b This cost is based on the average hourly labor rate as follows: Technical \$48.75 (GS-12, Step 1, \$30.47 + 60% Clerical \$26.38 (GS-6, Step 3, \$26.38 + 60%). This ICR assumes that Managerial hours are 5 percent of Techn hours. These rates are from the OPM, 2018 General Schedule, which excludes locality rates of pay. The rates include benefit packages available to government employees.

^c We assume that this is a one-time only cost.

^d We assume that it will take 12 hours two times per year to review the semiannual compliance reports.

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

FR Part 63, Subpart IIII) (Renewal)

48.75 62.9 25.25

(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
48	2.4	4.8	\$2,612.16
55			\$2,610

d over the next three-years of this ICR.

6); Managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%); and ical hours, and Clerical hours are 10 percent of Technical ave been increased by 60 percent to account for the