

Table 1a: Annual Respondent Burden and Cost – NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 6

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
1. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	32	1	32	1
b. Prepare washdown plan ^d	16	1	16	0
c. Prepare/review site-specific mercury monitoring plan ^e	8	1	8	1
d. Record date/time of washdowns	0.1	365	36.5	1
e. Measure cell room mercury vapor level and record data	0.5	365	182.5	1
f. Monitor vent mercury concentration and record CMS data, daily averages, and deviations	0.5	365	182.5	1
g. Perform vent mercury concentration CMS inspections and calibration checks and record results	8	2	16	1
h. 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	0.75	730	547.5	1
i. Inspect cell room floors for cracks, spalling, or other deficiencies and record information	2	12	24	1
j. Inspect pillars and beams for cracks, spalling, and other deficiencies and record information	8	2	16	1
k. 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	1.25	365	456.25	1
l. 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	1
m Record information on handling and storage of mercury-containing waste	0.25	365	91.25	1
n. Record the mass of virgin mercury added to cells	0.25	2	0.5	1
o. Inspect chlorine-containing equipment and record information on inspections and leaks	2	730	1460	1
Subtotal for Recordkeeping Requirements				
2. Reporting requirements				
a. Familiarize with regulatory requirements ^c	See 1A			
b. Initial notifications ^d	6	1	6	0
c. Notification of intent to conduct a performance test ^d	3	1	3	0

d. Revised Notification of compliance status ^f	16	1	16	1
e. Semiannual compliance reports	16	2	32	1
Subtotal for Reporting Requirements				
TOTAL ANNUAL BURDEN AND COST (rounded) ^g				
TOTAL CAPITAL AND O&M COSTS (rounded) ^g				
GRAND TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that there are is 1 respondent subject to the rule, with no new sources expected over the next three-year

^b This ICR uses the following labor rates: Technical \$121.88 (\$58.04 + 110%); Managerial \$148.81 (\$70.86 + 110%); and States Department of Labor, Bureau of Labor Statistics, June 2020, “Table 2. Civilian Workers, by occupational and industry rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Technical hours, and Clerical hours are 10 percent of Technical hours.

^c We assume all respondents will have to familiarize themselves with regulatory requirements each year, including the ele

^d We assume that these are one-time requirements that have already been met in the past.

^e We assume that the facility will review the monitoring plan after the rule revisions are finalized. This is a one-time occurrence

^f We assume that this is a one time event that will occur after the publication of the final amendments.

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

3, Subpart IIIII) (Proposed Rule) - Year 1

(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
32	1.6	3.2	\$4,333
0	0	0	\$0
8	0.4	0.8	\$1,083
36.5	1.825	3.65	\$4,942
182.5	9.125	18.25	\$24,709
182.5	9.125	18.25	\$24,709
16	0.8	1.6	\$2,166
548	27.375	54.75	\$74,128
24	1.2	2.4	\$3,249
16	0.8	1.6	\$2,166
456.25	22.81	45.625	\$61,773
16	0.8	1.6	\$2,166
91.3	4.56	9.125	\$12,355
0.5	0.025	0.05	\$68
1460	73	146	\$197,674
3,529			\$415,522
0	0	0	\$0
0	0	0	\$0

16	0.8	1.6	\$2,166
32	1.6	3.2	\$4,333
55			\$6,499
3,580			\$422,000
			\$8,200
			\$430,000

ars of this ICR.

d Clerical \$60.69 (\$28.90+ 110%). These rates are from the United
stry group.” The rates are from column 1, “Total compensation.” The
try. This ICR assumes that Managerial hours are 5 percent of

ectronic reporting requirements.

rence.

Table 1b: Annual Respondent Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 6

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
1. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	32	1	32	1
b. Prepare washdown plan ^d	16	1	16	0
c. Prepare/review site-specific mercury monitoring plan ^e	32	1	32	0
d. Record date/time of washdowns	0.1	365	36.5	1
e. Measure cell room mercury vapor level and record data	0.5	365	182.5	1
f. Monitor vent mercury concentration and record CMS data, daily averages, and deviations	0.5	365	182.5	1
g. Perform vent mercury concentration CMS inspections and calibration checks and record results	8	2	16	1
h. 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	0.75	730	547.5	1
i. Inspect cell room floors for cracks, spalling, or other deficiencies and record information	2	12	24	1
j. Inspect pillars and beams for cracks, spalling, and other deficiencies and record information	8	2	16	1
k. 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	1.25	365	456.25	1
l. 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	1
m. Record information on handling and storage of mercury-containing waste	0.25	365	91.25	1
n. Record the mass of virgin mercury added to cells	0.25	2	0.5	1
o. Inspect chlorine-containing equipment and record information on inspections and leaks	2	730	1460	1

Subtotal for Recordkeeping Requirements				
2. Reporting requirements				
a. Familiarize with regulatory requirements ^c	See 1A			
b. Initial notifications ^d	6	1	6	0
c. Notification of intent to conduct a performance test ^d	3	1	3	0
d. Revised Notification of compliance status ^f	16	1	16	0
e. Semiannual compliance reports	16	2	32	1
Subtotal for Reporting Requirements				
TOTAL ANNUAL BURDEN AND COST (rounded) ^g				
TOTAL CAPITAL AND O&M COSTS (rounded) ^g				
GRAND TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that there are is 1 respondent subject to the rule, with no new sources expected over the next three-year

^b This ICR uses the following labor rates: Technical \$121.88 (\$58.04 + 110%); Managerial \$148.81 (\$70.86 + 110%); and States Department of Labor, Bureau of Labor Statistics, June 2020, “Table 2. Civilian Workers, by occupational and industry rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Technical hours, and Clerical hours are 10 percent of Technical hours.

^c We assume all respondents will have to familiarize themselves with regulatory requirements each year, including the ele

^d We assume that these are one-time requirements that have already been met in the past.

^e We assume that the facility will review the monitoring plan after the rule revisions are finalized. This is a one-time occu

^f We assume that this is a one time event that will occur after the publication of the final amendments.

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

3, Subpart IIIII) (Proposed Rule) - Year 2

(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
32	1.6	3.2	\$4,333
0	0	0	\$0
0	0	0	\$0
36.5	1.825	3.65	\$4,942
182.5	9.125	18.25	\$24,709
182.5	9.125	18.25	\$24,709
16	0.8	1.6	\$2,166
548	27.375	54.75	\$74,128
24	1.2	2.4	\$3,249
16	0.8	1.6	\$2,166
456.25	22.81	45.625	\$61,773
16	0.8	1.6	\$2,166
91.3	4.56	9.125	\$12,355
0.5	0.025	0.05	\$68
1460	73	146	\$197,674

3,520			\$414,439
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
32	1.6	3.2	\$4,333
37			\$4,333
3,560			\$419,000
			\$8,200
			\$427,000

ars of this ICR.

d Clerical \$60.69 (\$28.90+ 110%). These rates are from the United
stry group.” The rates are from column 1, “Total compensation.” The
try. This ICR assumes that Managerial hours are 5 percent of

ctronic reporting requirements.

rrence.

Table 1c: Annual Respondent Burden and Cost – NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 61)

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
1. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	32	1	32	1
b. Prepare washdown plan ^d	16	1	16	0
c. Prepare/review site-specific mercury monitoring plan ^e	32	1	32	0
d. Record date/time of washdowns	0.1	365	36.5	1
e. Measure cell room mercury vapor level and record data	0.5	365	182.5	1
f. Monitor vent mercury concentration and record CMS data, daily averages, and deviations	0.5	365	182.5	1
g. Perform vent mercury concentration CMS inspections and calibration checks and record results	8	2	16	1
h. 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	0.75	730	547.5	1
i. Inspect cell room floors for cracks, spalling, or other deficiencies and record information	2	12	24	1
j. Inspect pillars and beams for cracks, spalling, and other deficiencies and record information	8	2	16	1
k. 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	1.25	365	456.25	1
l. 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	1
m Record information on handling and storage of mercury-containing waste	0.25	365	91.25	1
n. Record the mass of virgin mercury added to cells	0.25	2	0.5	1
o. Inspect chlorine-containing equipment and record information on inspections and leaks	2	730	1460	1
Subtotal for Recordkeeping Requirements				
2. Reporting requirements				
a. Familiarize with regulatory requirements ^c	See 1A			
b. Initial notifications ^d	6	1	6	0
c. Notification of intent to conduct a performance test ^d	3	1	3	0

d. Revised Notification of compliance status ^f	16	1	16	0
e. Semiannual compliance reports	16	2	32	1
Subtotal for Reporting Requirements				
TOTAL ANNUAL BURDEN AND COST (rounded) ^g				
TOTAL CAPITAL AND O&M COSTS (rounded) ^g				
GRAND TOTAL (rounded) ^g				

Assumptions:

^a We have assumed that there are is 1 respondent subject to the rule, with no new sources expected over the next three-year period.

^b This ICR uses the following labor rates: Technical \$121.88 (\$58.04 + 110%); Managerial \$148.81 (\$70.86 + 110%); and Clerical \$45.86 (\$22.00 + 110%). These rates are based on the Bureau of Labor Statistics, June 2020, “Table 2. Civilian Workers, by occupational and industrial category, by sex, race, and hispanic or latino ethnicity, by state, 2019.” Rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Technical hours, and Clerical hours are 10 percent of Technical hours.

^c We assume all respondents will have to familiarize themselves with regulatory requirements each year, including the elements of the rule.

^d We assume that these are one-time requirements that have already been met in the past.

^e We assume that the facility will review the monitoring plan after the rule revisions are finalized. This is a one-time occurrence.

^f We assume that this is a one time event that will occur after the publication of the final amendments.

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

3, Subpart IIIII) (Proposed Rule) - Year 3

(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
32	1.6	3.2	\$4,333
0	0	0	\$0
0	0	0	\$0
36.5	1.825	3.65	\$4,942
182.5	9.125	18.25	\$24,709
182.5	9.125	18.25	\$24,709
16	0.8	1.6	\$2,166
548	27.375	54.75	\$74,128
24	1.2	2.4	\$3,249
16	0.8	1.6	\$2,166
456.25	22.81	45.625	\$61,773
16	0.8	1.6	\$2,166
91.3	4.56	9.125	\$12,355
0.5	0.025	0.05	\$68
1460	73	146	\$197,674
3,520			\$414,439
0	0	0	\$0
0	0	0	\$0

0	0	0	\$0
32	1.6	3.2	\$4,333
37			\$4,333
3,560			\$419,000
			\$8,200
			\$427,000

ars of this ICR.

d Clerical \$60.69 (\$28.90+ 110%). These rates are from the United
stry group.” The rates are from column 1, “Total compensation.” The
try. This ICR assumes that Managerial hours are 5 percent of

ectronic reporting requirements.

rence.

**Annual Respondent Burden and Cost – NESHAP for Mercury Cell Chlor-Alkali Plan
Three-Year Average Respondent Burden of Reporting and Recordkeeping Requirem**

Year	Total Respondents	Technical Hours	Management Hours	Clerical Hours
1 (2021)	1	3,117	156	312
2 (2022)	1	3,093	155	309
3 (2023)	1	3,093	155	309
Total	1	9,303	465	930
Average	1	3,101	155	310

its (40 CFR Part 63, Subpart IIII) (Proposed Rule)
ents

Total Labor Hours (rounded)	Labor Cost (rounded)
3,580	\$430,000
3,560	\$427,000
3,560	\$427,000
10,700	\$1,284,000
3,567	\$428,000

Table 2a: Annual EPA Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 63, Sul

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) ^d	32	1	32	1
e. Review performance test reports ^c	8	1	8	0
f. Review semiannual compliance reports ^e	12	2	24	1
TOTAL ANNUAL BURDEN AND COST (rounded) ^f				

Assumptions:

a We have assumed that there is 1 respondent subject to the rule, with no new sources expected over the next three-yea

b This cost is based on the average hourly labor rate as follows: Technical \$50.72 (GS-12, Step 1, \$30.47 + 60%); Man (GS-6, Step 3, \$26.38 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical OPM, 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to ac

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

d Proposed rule requires submittal of a revised Notification of Compliance Status report. We assume that this is a one-t

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

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

part IIIII) (Proposed Rule) Year 1

(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
32	1.6	3.2	\$1,820
0	0	0	\$0
24	1.2	2.4	\$1,365.22
64			\$3,190

rs of this ICR.

anagerial \$68.37 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$27.46
 hours are 10 percent of Technical hours. These rates are from the
 count for the benefit packages available to government employees.

time only cost.

Table 2b: Annual EPA Burden and Cost – NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 63, Sul

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) ^d	32	1	32	0
e. Review performance test reports ^c	8	1	8	0
f. Review semiannual compliance reports ^e	12	2	24	1
TOTAL ANNUAL BURDEN AND COST (rounded) ^f				

Assumptions:

a We have assumed that there is 1 respondent subject to the rule, with no new sources expected over the next three-yea

b This cost is based on the average hourly labor rate as follows: Technical \$50.72 (GS-12, Step 1, \$30.47 + 60%); Man (GS-6, Step 3, \$26.38 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical OPM, 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to ac

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

d Proposed rule requires submittal of a revised Notification of Compliance Status report. We assume that this is a one-t

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

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

part IIIII) (Proposed Rule) Year 2

(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
24	1.2	2.4	\$1,365.22
28			\$1,370

rs of this ICR.

anagerial \$68.37 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$27.46
 hours are 10 percent of Technical hours. These rates are from the
 count for the benefit packages available to government employees.

time only cost.

Table 2c: Annual EPA Burden and Cost - NESHAP for Mercury Cell Chlor-Alkali Plants (40 CFR Part 63, Subpart G)

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) ^d	32	1	32	0
e. Review performance test reports ^c	8	1	8	0
f. Review semiannual compliance reports ^e	12	2	24	1
TOTAL ANNUAL BURDEN AND COST (rounded) ^f				

Assumptions:

a We have assumed that there is 1 respondent subject to the rule, with no new sources expected over the next three-year period.

b This cost is based on the average hourly labor rate as follows: Technical \$50.72 (GS-12, Step 1, \$30.47 + 60%); Managerial (GS-6, Step 3, \$26.38 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical OPM, 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for inflation.

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

d Proposed rule requires submittal of a revised Notification of Compliance Status report. We assume that this is a one-time cost.

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

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

Part IIII) (Proposed Rule) Year 3

(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
24	1.2	2.4	\$1,365.22
28			\$1,370

rs of this ICR.

anagerial \$68.37 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$27.46
 hours are 10 percent of Technical hours. These rates are from the
 count for the benefit packages available to government employees.

time only cost.

**Annual Respondent Burden and Cost – NESHAP for Mercury Cell Chlor-Alkali Plan
Three-Year Average Agency Burden of Reporting and Recordkeeping Requirements**

Year	Total Respondents	Technical Hours	Management Hours	Clerical Hours
1 (2021)	1	56	3	6
2 (2022)	1	24	1	2
3 (2023)	1	24	1	2
Total	1	104	5	10
Average	1	35	2	3

its (40 CFR Part 63, Subpart IIII) (Proposed Rule)

Total Labor Hours	Labor Cost (rounded)
64	\$3,190
28	\$1,370
28	\$1,370
120	\$5,930
40	\$1,977

	Labor Rate (\$/hr)	Overhead 110%	Total (\$/hr)
Respondent Burden			
Managerial	\$70.86	\$77.95	\$148.81
Technical	\$58.04	\$63.84	\$121.88
Clerical	\$28.90	\$31.79	\$60.69

United States Department of Labor, Bureau of Labor Statistics, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." For the 2019 renewal, these rates were from June 2018. For the updated rates, the rates were from June 2020. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

	Labor Rates (\$/hr)	Overhead 60%	Benefit Package Adjustment 60%
Agency Burden			
Managerial	\$42.73	\$25.64	\$68.37
Technical	\$31.70	\$19.02	\$50.72
Clerical	\$17.16	\$10.30	\$27.46

Office of Personnel Management (OPM), which excludes locality rates of pay. The rates have by 60 percent to account for the benefit packages available to government employees. Thes the 2020 General Schedule.

GS13, Step 5

GS12, Step 1

GS6, Step 3

have been increased
the rates are from