

DOE Basis for Elemental Mercury Storage Fee

Cost Elements	Amount	Basis in Preamble, 84 FR 53066
annual storage cost	\$810/MT	“based on pricing from U.S. commercial vendors” – no supporting information in the administrative record
annual increase	3.5%	“based on pricing from a solicited offer to DOE by a U.S. commercial vendor” – not in the administrative record, not tied to an OMB approved rate, not based on historical price increases
receiving charge	\$3,250	“based on pricing from U.S. commercial vendors” – not in admin record, not customary charge by industry
removal charge from storage facility	\$376/MT	based on the receiving charge, increased by 3.5% each fiscal year for sixteen years, then allocated on a pro rata basis using a 15 MT shipment capacity – not customary charge
transportation from storage facility to disposal facility	\$1,230/MT	“based on the current transportation cost of elemental mercury from generators’ sites in Nevada to long-term RCRA-permitted storage facilities” – costs and calculations not in admin record
escalation	3.5%	“this [transportation] cost is also escalated at 3.5% each fiscal year for sixteen years” – no basis in admin record
treatment and disposal	\$37,900/MT	“based on preliminary pricing from a U.S. commercial vendor and includes all DOE costs” “While there is no current regulatory framework to treat and dispose of elemental mercury in the U.S., DOE is assuming” future capacity – so what is the basis for “preliminary pricing” and “DOE costs”?
resulting total cost / storage fee (approx \$25 per pound)	\$55,100/MT	