

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Beryllium Rocket Motor Fuel Firing (

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR 61.40 were promulgated on April 6, 1973 and amended on November 7, 1985 for this source category. These regulations apply to existing facilities and new facilities that test rocket motors that use beryllium propellant. New facilities are those that commenced construction or reconstruction after the date of promulgation. This information is being collected to assure compliance with 40 CFR part 61, subpart D.

In general, all NESHAP standards require owners or operators of the affected facilities to submit initial notifications including, performance test, and periodic reports. Owners or operators 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 sources subject to NESHAP.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least two 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 United States Environmental Protection Agency (EPA) regional office.

In order to ensure compliance with the standards, adequate record keeping and reporting is necessary. This information enables the Agency to: (1) identify the sources subject to the standard; (2) ensure initial compliance with emission limits; and (3) verify continuous compliance with the standard. Specifically, the rule requires subject test sites to test ambient air for beryllium during and after firing of a rocket motor. Samples are analyzed within 30 days and results are reported to the EPA Region by registered letter by the business day following the determination. The rule also requires stack sampling of beryllium combustion products during and after firing of rocket motor, and analysis and reporting within 30 days. The results are reported to EPA by the day following the determination and calculation.

There is one test facility and three to four stored beryllium fueled rockets subject to NESHAP 40 CFR part 61, subpart D. It is estimated that no additional new sources will become

subject to the regulation in the next three years. It is assumed that there is one affected facility per plant.

There is approximately one beryllium fueled rocket plant in the United States, which is owned and operated by the beryllium fueled rocket industry. This one facility in the United States is not owned by state, local, tribal or the Federal government. This facility is owned and operated by privately owned for-profit business. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D) (Renewal). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D) (Renewal).

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

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or 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, beryllium emissions from beryllium rocket motor test sites, cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 61, subpart D.

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 tests, 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 61, subpart D.

3(a) Nonduplication

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 their 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, no duplication exists.

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 (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. 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 the EPA Office of Compliance. OTIS is the EPA 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. Approximately seventeen respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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.

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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are beryllium. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is 3764 which correspond to the North American Industry Classification System (NAICS) 336415 for rocket motor test sites.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations

established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D).

A source must make the following reports:

Notifications	
Notification and application of construction, reconstruction	61.06, and 61.07
Notification of anticipated date of initial startup	61.09(a)(1)
Notification of actual startup	61.09(a)(2)
Notification of physical or operational change which may increase the emission rate	61.15
Notification of performance tests	61.13(f) and 61.14(c)
Notification of anticipated firing	61.43 or 61.44
Emission source reporting	61.10(a)
Emission test report and ambient air quality report	61.43 and 61.44

A source must keep the following records:

Recordkeeping	
Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of periods where the monitoring system is malfunctioning or inoperative. Records shall be retained for at least two years.	61.14(f)
Record air sampling results. Records are required to be retained for two years.	61.43
Record emission test results	61.44
Make records available to Agency	61.43, and 61.44

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, the one facility that is subject to this rule does not report electronically.

(ii) Respondent Activities

Respondent Activities
Read instructions.
During test firing, ambient air concentrations shall be measured during and after test firing or propellant disposal, in such a manner that emissions can be compared with the standard.
During test firing, continuously sample emissions from the test tank as per method 104 (or alternately, Method 103).
Write the notification 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.
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.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides 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
Observe air sampling tests and emission tests.
Review notifications and reports, including emission reports, required to be submitted by industry.

Agency Activities
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 might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and 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.

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

The records required by this regulation must be retained by the owner or operator for two years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D).

6. Estimating the Burden and Cost of the Collection

Table 1 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 eight (Total Labor Hours from Table 1). 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

Managerial	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "Table 2. Private industry, 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$212.

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

Managerial	\$54.66	(GS-13, Step 5, \$34.16 + 60%)
Technical	\$40.56	(GS-12, Step 1, \$25.35 + 60%)
Clerical	\$21.95	(GS-6, Step 3, \$13.72 + 60%)

These rates are from the Office of Personnel Management (OPM) 2004 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 in Table 2: Average Annual EPA Burden, NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D), below.

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

Based on our research for this ICR, one existing source is currently subject to the standard. It is estimated that no additional sources per year will become subject. The overall average number of respondents, as shown in the table below is one per year.

The number of respondent is calculated using the following table which 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	1	0	0	1
2	0	1	0	0	1
3	0	1	0	0	1
Average	0	1	0	0	1

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 1.

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 $E=(B \times C)+D$
Notification of construction or modification	0	0	n/a	0
Notification of anticipated initial startup	0	0	n/a	0
Notification of actual startup	0	0	n/a	0
Notification of physical or operational change	1	0	n/a	0
Notification of performance test	0	0	n/a	0
Notification of anticipated firing	1	1	n/a	1
			Total	1

The number of Total Annual Responses is one.

The total annual labor costs are \$538. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D), below.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor costs are \$538. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D) (Renewal), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 hours per response.

There are no annual capital/startup and O&M costs to the regulated entities. 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 five labor hours at a cost of \$212. See Table 2. Annual Agency Burden and Cost: NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR part 61, subpart D), below.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR, and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 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's 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-2007-0053. 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 content 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), EPA West, Room 3334, 1301 Constitution Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0053 and OMB Control Number 2060-0394 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 Beryllium Rocket Motor Firing (40 CFR part 61, subpart D)

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	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications								
A. Application for approval of construction/Modification	12	0	0	0	0	0	0	\$0
B. Source information report/application	6	0	0	0	0	0	0	\$0
C. Request for ambient air monitoring alternative	18	0	0	0	0	0	0	\$0
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	3	0.33	1	0	0	0	0	\$0
B. Required activities								
Emission test ^c	6	0.33	2	1	2	0.1	0.2	\$146.75
Calculation of emission estimates	3	0.33	1	1	1	0.05	0.1	\$73.38
Monitoring ambient beryllium concentrations	3	0.33	1	1	1	0.05	0.1	\$73.38
C. Create information	2	1	2	0	0	0	0	\$0
D. Gather existing information	3	0.33	1	1	1	0.05	0.1	\$73.38
E. Write Report								
Notification of test ^d	1	0.33	0.33	1	0.33	0.02	0.03	\$24.43
Report of test ^e	3	0.33	1	1	1	0.05	0.1	\$73.38
Report of calculated emission levels	3	0	0	0	0	0	0	\$0
Plans for location monitors	1	0	0	0	0	0	0	\$0
Report monthly ambient concentrations	1	12	12	0	0	0	0	\$0
4. Recordkeeping requirements								
A. Read instructions	N/A							
B. Plan activities	N/A							
C. Implement Activities	N/A							
D. Develop record system	N/A							
E. Time to enter information ^f	3	0.33	1	1	1	0.05	0.1	\$73.38

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	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotals Labor Burden and cost					7.33	0.37	0.73	\$538.08
TOTAL LABOR BURDEN AND COST					8.43 8 (rounded)			\$538

Assumptions:

^a We have assumed that there will be one existing source subject to the rule, with no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$95.32 per hour for Executive, Administrative, and Managerial labor; \$64.60 per hour for Technical labor, and \$40.09 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, ATable 10. Private industry, by occupational and industry group. @ The rates are from column 1, ATotal compensation. @ The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that it will take 6 hours to complete the emission test.

^d We have assumed that it will take one hour to write notification of test report.

^e We have assumed that it will take three hours to write report of test.

^f We have assumed that it will take three to enter information.

Table 2: Average Annual EPA Burden - NESHAP for Beryllium Rocket Motor Firing (40 CFR part 61, subpart D)

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- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Performance test								
a. Rocket motor firing	6	0.33	2	1	2	0.1	0.2	\$90.98
2. Report review								
a. Test firing report review	4	0.33	1.32	1	1.32	0.07	0.13	\$60.22
b. Application of construction	2	0.33	0.66	0	0	0	0	\$0
c. Notification of anticipated firing of rocket motor	3	0.33	1	1	1	0.05	0.1	\$45.49
d. Review report of test results	1	0.33	0.33	1	0.33	0.02	0.03	\$15.13
TOTAL ANNUAL BURDEN AND COST						5.07 5 (rounded)		\$212

Assumptions:

^a We have assumed that there will be one existing source subject to the rule, with no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$54.66 (GS-13, Step 5, \$34.16 x 1.6), Technical rate of \$40.56 (GS-12, Step 1, \$25.35 x 1.6), and Clerical rate of \$21.95 (GS-6, Step 3, \$13.72 x 1.6).

These

rates are from the Office of Personnel Management (OPM) A2003 General Schedule@ which excludes locality rates of pay.

^c We have assumed that it will take six hours to perform the rocket motor firing test.

^d We have assumed that it will take three hours review the notification of anticipated firing of rocket motor report.

^e We have assumed that it will take one hour to review the test results report.