

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal), EPA ICR Number 0193.10, OMB Control Number 2060-0092

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Beryllium were proposed on December 7, 1971 (36 FR 23939), and promulgated on April 6, 1973 (38 FR 8826). This standard applies to all extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste. The standard also applies to machine shops which process beryllium, beryllium oxides, or any alloy when such alloy contains more than 5 percent beryllium by weight. All sources known to have caused, or to have the potential to cause, dangerous levels of beryllium in the ambient air are covered by the Beryllium NESHAP. This information is being collected to assure compliance with 40 CFR part 61, subpart C.

In general, all NESHAP standards require owners or operators of the affected facilities to submit one-time-only notifications including: notification of any physical or operational change to an existing facility which may increase the regulated pollutant emission rate, notification of the initial performance test, including information necessary to determine the conditions of the performance test, and performance test measurements and results. 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.

Specifically, most facilities subject to 40 CFR part 61, subpart C will meet the standard by means of a one-time-only initial stack test. However, those existing facilities that have elected to comply with an alternative ambient air quality limit are required to operate a continuous monitor in the vicinity of the affected facility. The monitoring requirements for these facilities provide information on ambient air quality and ensure that locally, the airborne beryllium concentration does not exceed 0.01 micrograms/m³. For those complying by ambient monitoring, a monthly report of all measured concentrations will be submitted to the Administrator.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site, and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

There are approximately 236 existing sources subject to this rule. Of the total number of existing sources, we have assumed that approximately 10 sources have elected to comply with this rule by monitoring ambient air beryllium concentrations and the remaining 226 sources have elected to comply with the rule by conducting a one-time only stack test to determine beryllium emission levels. We also assumed that 10 percent of the 226 sources (or 23 respondents) complying with the emission limit standard will engage in an operational change at their facilities that could potentially increase beryllium emissions, and would be required to repeat the stack test to determine the beryllium emission limits, and consequently will have recordkeeping and reporting requirements associated with this activity. Overall, we have determined that there are an estimated 33 respondents currently subject to this rule. It is estimated that no additional sources will become subject to the standard over the next three years.

All of the beryllium facilities in the United States are owned and operated by the beryllium industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the “Affected Public” is listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

The active (previous) ICR had the following “Terms of Clearance (TOC):

Part of its submission, EPA should verify that the wage rate referenced in sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

EPA has addressed the TOC. The wage rates referenced in Sections 6(b) and 6(c) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

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 extraction plants, ceramic plants, foundries, incinerators, propellant plants and machine shops which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste, cause, or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 61, subpart C.

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. In addition, the collected information is 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.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

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 (75 FR 30813) on June 2, 2010. 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.

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.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 North American Industry Classification System (NAICS) codes are listed below for each source category description.

Standard (40 CFR, part 61, subpart C)	NAICS Codes
Industrial Inorganic Chemicals, not elsewhere Classified	325188
Primary Smelting and Refining of Nonferrous Metals, except Copper and Aluminum	331419
Nonferrous Foundries, except Aluminum and Copper	331528
Industrial and Commercial Machinery and Equipment, not elsewhere Classified	332710
Refuse Systems	562211
Refuse Systems	562920

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 the NESHAP for Beryllium (40 CFR part 61, subpart C).

A source must make the following reports:

Notifications	
Notification and application of construction or modification	61.07
Notification of actual startup	61.09(a)(2)
Notification of initial performance test	61.13(f) and 61.33(d)
Notification of emission tests	61.13(c) and 61.33(b)
Notification requesting approval to meet an ambient concentration limit on beryllium in the vicinity of the stationary source (alternative standard)	61.32(b)
Source status report for facilities complying by ambient monitoring, a monthly report of all measured beryllium concentrations shall be submitted to the administrator	61.10(a) and 61.34(d)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions period where the continuous monitoring system is inoperative due to maintenance and calibration, for changing filters, or for replacement equipment needing major repairs.	61.34(b)
Emission tests results and other data needed to determine emissions.	61.13(g) and 61.34(c)
Records are required to be retained for 2 years	61.34(c)

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 not widely used. At this time, it is estimated that approximately 10 percent of the respondents are reporting electronically.

(ii) Respondent Activities

Respondent Activities
Read instructions.
For facilities that have elected to comply with an alternative ambient air quality limit, install, calibrate, maintain, and operate a continuous monitor in the vicinity of the affected facility to measure beryllium concentrations.
For facilities complying by ambient monitoring, perform emission testing to determine beryllium emissions to the atmosphere according to Method 104 or Method 103 (an alternative method needing approval) of appendix B to part 61.
Write the notifications 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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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 initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the 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 edits, stores, retrieves and analyzes 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 below in Table 1: Annual Respondent Burden - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

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 2,627 (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	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "Table 2. Civilian Workers, 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 type of industry costs associated with the information collection activities in the subject standard are labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Ambient Monitor	\$0	0	\$0	\$3,500	10	\$35,000
Total			\$0			\$35,000

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$35,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$35,000.

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 \$14,822.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rate 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 below in Table 2: Average Annual EPA Burden - NESHP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 33 respondents will be subject to the standard. It is estimated that no new respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is 33 per year.

The number of respondents 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	33	0	0	33
2	0	33	0	0	33
3	0	33	0	0	33

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)
Average	0	33	0	0	33

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 33.

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=(BxC)+D
Notification of stack test	23	1	0	23
Emission level/operational changes	23	1	0	23
Monthly ambient concentrations	10	12	0	120
Total Number of Annual Responses			Total	166

The number of Total Annual Responses is 166.

The total annual labor costs are \$246,442. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

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 hours are 2,627. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$35,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 329 labor hours at a cost of \$14,822. See below Table 2: Average Annual EPA Burden – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

6(f) Reasons for Change in Burden

There is no increase in the number of affected facilities, labor hours, or the number of responses compared to the previous ICR. There is, however, an increase in the estimated labor burden cost as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program change. The change in the labor burden cost estimates has occurred because we updated the labor rates, which resulted in an increase in labor costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2010-0355. 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" than 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-2010-0355 and OMB Control Number 2060-0092 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 (40 CFR Part 61, Subpart C) (Renewal)

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) Total Cost Per year ^b
1. Applications								
a Application for approval of construction/modification	4	1	4	0	0	0	0	\$0
b Request for ambient air monitoring alternative	4	1	4	0	0	0	0	\$0
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	0	0	0	0	\$0
B. Required activities								
Initial emissions test	20	1	20	0	0	0	0	\$0
Determine emission level from stack test ^c	8	1	8	23	184	9.2	18.4	\$19,853.51
Monitoring of ambient beryllium concentrations	See 3E							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of stack test ^d	2	1	2	23	46	2.3	4.6	\$4,963.37
Report of emission level determination/operational change ^e	8	1	8	23	184	9.2	18.4	\$19,853.51
Plan for locating monitors	16	1	16	0	0	0	0	\$0
Report monthly ambient concentrations ^f	8	12	96	10	960	48	96	\$103,583.52
Subtotal for Reporting Requirements						1,580.1		\$148,253.91
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of operating parameters and emissions ^g	0.25	365	91	10	910	45.5	91	\$98,188.54
F. Time to train personnel	N/A							
G. Time for audits	N/A							

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) Total Cost Per year ^b
Subtotal for Recordkeeping Requirements						1,046.5		\$98,188.54
					2,284	114.2	228.4	\$246,442.45
TOTAL LABOR BURDEN AND COST (rounded)						2,626.6 2,627 (rounded)		\$246,442

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 33. There will be no new additional sources during the next three years of this ICR. There are approximately 236 existing sources subject to this rule, but of the total number of existing sources, we have assumed that approximately 10 sources will elect to comply with this rule by monitoring ambient air beryllium concentrations and the remaining 226 sources have elected to comply with the rule by conducting a one-time only stack test which has already been completed. We have also assumed that 10 percent of the 226 sources (23 respondents) will engage in an operational change that could potentially increase beryllium emissions, thus, requiring sources to repeat the stack test, and consequently will have recordkeeping and reporting requirements. Therefore, there are 33 respondents for the purpose of determining the recordkeeping and reporting burdens associated with this rule.

^b This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2010, Table 2. Civilian Workers, 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.

^c We have assumed that each respondent will take eight hours to determine the emission level from the stack test.

^d We have assumed that each respondent will take two hours to write notification report of stack test.

^e We have assumed that each respondent will take eight hours to complete the report of emission level determination/operational change.

^f We have assumed that each respondent will take eight hours once per month to write the monthly ambient concentrations report.

^g We have assumed that each of the ten respondents will take fifteen minutes each day to enter records of operating parameters and emissions information.

Table 2: Average Annual EPA Burden - NESHP for Beryllium (40 CFR Part 61, Subpart C) (Renewal)

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
Initial performance test								
New plant	20	1	20	0	0	0	0	\$0
Report review								
Notification of construction	2	1	2	0	0	0	0	\$0
Request to use ambient air concentration alternative	2	1	2	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of initial stack test	0.5	1	0.5	0	0	0	0	\$0
Report of initial analysis	2	1	2	0	0	0	0	\$0
Existing plant								
Notification of stack test	40	1	40	0	0	0	0	\$0
Report of emission level determination/operational change ^c	2	1	2	23	46	2.3	4.6	\$2,383.93
Report of monthly ambient concentrations ^d	2	12	24	10	240	12	24	\$12,437.88
Subtotals Labor Burden and cost					286	14.3	28.5	\$14,821.81
TOTAL ANNUAL BURDEN AND COST (rounded)						328.9 329 (rounded)		\$14,822

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 33. There will be no new additional sources during the next three years of this ICR. There are approximately 236 existing sources subject to this rule, but of the total number of existing sources, we have assumed that approximately 10 sources will elect to comply with this rule by monitoring ambient air beryllium concentrations and the remaining 226 sources have elected to comply with the rule by conducting a one-time only stack test which has already been completed. We have also assumed that 10 percent of the 226 sources (23 respondents) will engage in an operational change that could potentially increase beryllium emissions, thus, requiring sources to repeat the stack test, and consequently will have recordkeeping and reporting requirements. Therefore, there are 33 respondents for the purpose of determining the recordkeeping and reporting burdens associated with this rule.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

^c We have assumed that each respondent will take two hours to review the emission level determination/operational change report.

^d We have assumed that each respondent will take two hours once per month to review the monthly ambient concentrations report.