

**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 0193.11, OMB Control Number 2060-0092

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Beryllium were: 1) proposed on December 7, 1971 (36 FR 23939); 2) promulgated on April 6, 1973 (38 FR 8826); and 3) last amended on October 17, 2000. These regulations apply to all extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxides, beryllium alloys, or beryllium-containing waste. The regulations also apply 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 standard. This information is being collected to assure compliance with 40 CFR part 61, subpart C.

In general, all NESHAP standards require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall 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 U. S. 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 33 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. Note that of a total of approximately 236 existing sources, we assume approximately 10 sources have elected to comply with the rule by monitoring ambient air beryllium concentrations, while the remaining 226 sources have elected to comply by conducting a one-time-only stack test. We

also have assumed that 10 percent of the 226 sources (i.e., 23 respondents) will engage in operational changes that will require them to repeat stack testing and to carry out subsequent recordkeeping and reporting requirements.

OMB approved the currently active ICR without any “Terms of Clearance.”

The “Affected Public” are owners or operators of beryllium industry facilities. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal). The burden to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost –NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

## **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. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/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 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. 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test 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 either 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 check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

## **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 its 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, duplication does not exist.

### **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 (78 FR 33409) on June 4, 2013. 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.

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, EPA contacted: 1) the Society for Mining, Metallurgy, and Exploration (SME), at (303) 948-4200; and 2) the National Mining Association (NMA), at (202) 463-2600.

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. In this case, no comments were received.

### **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**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 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**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are sources which process beryllium and its derivatives. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are provided in the following table.

Standard (40 CFR, Part 61, Subpart C)	SIC Codes	NAICS Codes
Industrial Inorganic Chemicals, not elsewhere Classified	2819	325188
Primary Smelting and Refining of Nonferrous Metals, except Copper and Aluminum	3339	331419
Nonferrous Foundries, except Aluminum and Copper	3369	331528
Industrial and Commercial Machinery and Equipment, not elsewhere Classified	3599	332710
Refuse Systems	4953	562211 and 562920

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Beryllium (40 CFR Part 61, Subpart C).

A source must make the following notifications/reports:

Notifications/Reports	
Notification and application of construction or modification	61.07
Notification of actual startup	61.09(a)(2)
Notification of emission test	61.13(c) and 61.33(b)
Report of emission test results	61.13(f) and 61.33(d)
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	61.10(a) and 61.34(d)

<b>Notifications/Reports</b>	
monthly report of all measured beryllium concentrations shall be submitted to the administrator	

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of monitoring data, monitoring system calibration checks, and any periods when the monitoring system is malfunctioning or inoperative for two years.	61.14(f)
Maintain records of emission test results and other data needed to determine emissions and air concentrations for two years	61.13(g), 61.34(c), and 61.33(e)

### 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, it is estimated that approximately 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>	
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.	

<b>Respondent Activities</b>
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.

Currently sources are using monitoring and reporting equipment that provide 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.

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
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 could inspect the source to determine whether the pollution control devices are properly installed and operated. 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 EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

### **5(c) Small Entity Flexibility**

A 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 below Table 1: Annual Respondent Burden and Cost – 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 record-keeping and reporting requirements is estimated to be 2,629 hours (see ‘Total Labor Hours’ from Table 1 below). 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

This ICR uses the following labor rates:

Managerial	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “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 both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. Capital/startup costs are onetime costs when a facility becomes subject to the regulation. 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) Costs

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 \$0. 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. EPA's overall 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), 2013 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 below in Table 2: Average Annual EPA Burden and Cost – NESHAP 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 existing respondents will be subject to the standards. It is estimated that no additional respondents per year will become subject to these same standards. 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 that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondent <sup>2</sup>	(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
Average	0	33	0	0	33

<sup>1</sup> New respondent include sources with constructed, reconstructed, and modified affected facilities.

<sup>2</sup> It includes 10 sources that elected to comply by conducting ambient air monitoring, and 23 sources that are required to conduct a repeat stack test due to an operational change.

Column D is subtracted to avoid double-counting respondents. 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:

<b>Total Annual Responses</b>				
(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	166

The number of Total Annual Responses is 166.

The total annual labor costs are \$257,208. 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 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 below, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 2,629 hours at a cost of \$257,208. 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 O&M costs to the regulated entity are \$35,000. 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 329 labor hours at a cost of \$14,822. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

### **6(f) Reasons for Change in Burden**

There is an apparent increase of two hours in the total estimated respondent burden as currently identified in the OMB Inventory of Approved Burdens. This increase is due to rounding, and is not due to any program changes. The most-recently approved ICR rounded the burden hours associated with recordkeeping for operating parameters and emissions to the nearest whole number. In contrast, burden hours are rounded to two decimal places in this ICR, resulting in an apparent increase of two hours.

There is an increase in the respondent cost from the most recently approved ICR due to the use of updated labor rates. This ICR references labor rates from the Bureau of Labor Statistics to calculate the respondent burden cost.

### **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, 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 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-2013-0301. 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 contents 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), WJC West, Room 3334, 1301 Constitution Ave., NW, 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 docket center 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, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0301 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	B	C	D	E	F	G	H
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year <sup>b</sup> (\$)
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							\$0
3. Reporting requirements								\$0
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 <sup>c</sup>	8	1	8	23	184	9.2	18.4	\$20,698.16
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 <sup>d</sup>	2	1	2	23	46	2.3	4.6	\$5,174.54
Report of emission level determination/operational change <sup>e</sup>	8	1	8	23	184	9.2	18.4	\$20,698.16
Plan for locating monitors	16	1	16	0	0	0	0	\$0
Report monthly ambient concentrations <sup>f</sup>	8	12	96	10	960	48	96	\$107,990.40
<b>Subtotal for Reporting Requirements</b>						<b>1,580.1</b>		<b>\$154,561.26</b>

Burden Item	A	B	C	D	E	F	G	H
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year <sup>b</sup> (\$)
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 <sup>g</sup>	0.25	365	91.25	10	912.5	45.63	91.25	\$102,647.13
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>1,049.38</b>		<b>\$102,647.13</b>
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>2,629</b>		<b>\$257,208</b>

Assumptions:

- <sup>a</sup> For the purpose of determining recordkeeping and reporting burdens associated with this rule, we have assumed there are 33 respondents, and that no new additional sources will be subject over the three-year period of this ICR. Of a total of approximately 236 existing sources, we have assumed approximately 10 sources have elected to comply with the rule by monitoring ambient air beryllium concentrations and that the remaining 226 sources have complied by conducting a one-time-only stack test. We also have assumed that 10 percent of the 226 sources (i.e., 23 respondents) will engage in operational changes that will require them to repeat stack testing and to carry out subsequent recordkeeping and reporting requirements.
- <sup>b</sup> This ICR uses the following labor rates: \$101.22 for technical, \$123.04 for managerial, and \$51.18 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "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.
- <sup>c</sup> We have assumed that each respondent will take eight hours to determine the emission level from the stack test.
- <sup>d</sup> We have assumed that each respondent will take two hours to write notification report of stack test.
- <sup>e</sup> We have assumed that each respondent will take eight hours to complete the report of emission level determination/operational change.
- <sup>f</sup> We have assumed that each respondent will take eight hours once per month to write the monthly ambient concentrations report.
- <sup>g</sup> 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 and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year <sup>b</sup> (\$)
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	1	0	0	0	0	\$0
Notification of initial stack test	0.5	1	1	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 <sup>c</sup>	2	1	2	23	46	2.3	4.6	\$2,383.93
Report of monthly ambient concentrations <sup>d</sup>	2	12	24	10	240	12	24	\$12,437.88
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>329</b>		<b>\$14,822</b>

## Assumptions:

<sup>a</sup>. For the purpose of determining recordkeeping and reporting burdens associated with this rule, we have assumed there are 33 respondents, and that no new additional sources will be subject over the three-year period of this ICR. Of a total of approximately 236 existing sources, we have assumed approximately 10 sources have elected to comply with the rule by monitoring ambient air beryllium concentrations and that the remaining 226 sources have complied by conducting a one-time-only stack test. We also have assumed that 10 percent of the 226 sources (i.e., 23 respondents) will engage in operational changes that will require them to repeat stack testing and to carry out subsequent recordkeeping and reporting requirements.

<sup>b</sup>. This ICR uses the following labor rates: \$46.21 for technical, \$62.27 for managerial, and \$25.01 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2013 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.

<sup>c</sup>. We have assumed it will take two hours per respondent to review the emission level determination/operational change report.

<sup>d</sup>. We have assumed it will take two hours per respondent per month to review the monthly ambient concentrations report.