

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (Renewal)**

**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),  
EPA ICR Number 1125.07, OMB Control Number 2060-0394

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Beryllium Rocket Motor Fuel Firing were promulgated on April 6, 1973 (38 FR 8826), and was last amended on October 17, 2000 (65 FR 62151). These regulations apply to existing and new building, structure, facility, or installation where the static test firing of a beryllium rocket motor and/or the disposal of beryllium propellant is conducted. New facilities include 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 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.

The “Affected Public” are beryllium-fueled rocket test sites. There is approximately one affected test site in the United States, which is owned and operated by the beryllium-fueled rocket industry. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (Renewal).

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

Over the next three years, one respondent and either three or four stored beryllium-fueled rockets will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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. 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 and associated combustion product emissions from rocket motor test sites 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 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 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 standards are used to inform either the Agency or its 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, leaks are being detected and repaired, and the standards are 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 D.

#### **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 35023) on June 11, 2013. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. 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 EPA's Office of Compliance. OTIS is EPA's 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 association and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the

standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we consulted with EPA internal subject matter experts and OAQPS. In addition, we contacted: 1) NASA's Wallops Flight Facility, at (757) 824-1941; and 2) ATK Missile Products Baltimore (previously: Morton-Thiokol Installation), at (410) 864-4800.

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 beryllium rocket motor fuel firing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3764, which corresponds to the North American Industry Classification System (NAICS) code 336415 for Guided Missile and Space Vehicle

Propulsion Units and Propulsion Unit Parts Manufacturing.

#### **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 Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D).

A source must make the following reports:

<b>Notifications</b>	
Notification and application of construction, reconstruction	61.06, 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), 61.14(c)
Notification of anticipated firing	61.43 or 61.44

<b>Reports</b>	
Emission source reporting	61.10(a)
Emission test report and ambient air quality report	61.43, 61.44

A source must keep the following records:

<b>Recordkeeping</b>	
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, 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.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
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 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 following required information:

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

<b>Agency Activities</b>
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 standards (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**

After reviewing relevant available background documents related to the standards, an estimate of the number of small entities affected could not be determined. However, the cost associated with the regulation is expected to be less than a tenth of a percent of revenues for these entities.

The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulations. 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 – NESHP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (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 9 hours (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 only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are neither capital/startup nor operation and maintenance costs involved with these standards.

#### **(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 neither capital/startup nor operation and maintenance costs



involved.

### **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 \$240.

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 Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (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 one existing respondents will be subject to the standards. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is one 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>					
Year	(A) Number of New Respondents <sup>1</sup>	(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
<b>Average</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

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

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 1.

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 construction or modification	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of physical or operational change	0	1	0	0
Notification of performance test	0	1	0	0
Notification of anticipated firing	1	0.33	0	0.33
Emission test and sampling results	1	0.33	0	0.33
Emission test report	1	0.33	0	0.33
			<b>Total</b>	<b>1</b>

Note: We assume the existing one subject facility will conduct rocket motor testing once over the three-year period of this ICR.

The number of Total Annual Responses is 1.

The total annual labor costs are \$930. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (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, respectively, and summarized below.

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

The total annual labor hours are 9 hours at a cost of \$930. 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).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 9 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are zero. 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 5 labor hours at a cost of \$240. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

There is a small increase in respondent burden hour because we assume the existing source will take some time to re-familiarize with the rule requirements. The change in the cost

estimates is a result of using updated labor rates to facilitate the calculation of burden costs and rounding of the final calculated values.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 9 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-2013-0322. 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-2013-0322 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 Fuel Firing (40 CFR Part 61, Subpart D) (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 <sup>a</sup>	(E) Technical person- hours per year (E = CxD)	(F) Management person-hours per year (E x 0.05)	(G) Clerical person-hours per year (E x 0.1)	(H) Cost <sup>b</sup> (\$)
<b>1. Applications</b>								
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
<b>2. Survey and Studies</b>	N/A							
<b>3. Reporting requirements</b>								
A. Familiarization with rule requirement	3	0.33	0.99	1	0.99	0.05	0.10	\$111.37
<b>B. Required activities</b>								
Emissions test <sup>c</sup>	6	0.33	1.98	1	1.98	0.10	0.2	\$222.73
Calculation of emission estimates	3	0.33	0.99	1	0.99	0.05	0.1	\$111.37
Monitoring ambient beryllium concentrations	3	0.33	0.99	1	0.99	0.05	0.1	\$111.37
C. Create Information	2	1	2	0	0	0	0	\$0
D. Gather existing information	3	0.33	0.99	1	0.99	0.05	0.1	\$111.37
<b>E. Write report</b>								
Notification of test <sup>d</sup>	1	0.33	0.33	1	0.33	0.02	0.03	\$37.12
Report of test <sup>e</sup>	3	0.33	0.99	1	0.99	0.05	0.1	\$111.37
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
<b>Subtotal for Reporting Requirements</b>						<b>8</b>		<b>\$705.33</b>
<b>4. Recordkeeping requirements</b>								
A. Read instructions	N/A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Enter information <sup>f</sup>	3	0.33	0.99	1	0.99	0.05	0.1	\$111.37
F. Train personnel	N/A							
G. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>1</b>		<b>\$111.37</b>
<b>TOTAL ANNUAL BURDEN AND COST (Rounded)</b>						<b>9</b>		<b>\$930</b>

Capital and O&M Cost						\$0
<b>Grand Total (Rounded)</b>						<b>\$930</b>

**Note:** Totals have been rounded to 2 significant digits (where appropriate). Figures may not add exactly due to rounding.

**Assumptions:**

- <sup>a</sup> 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.
- <sup>b</sup> This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour 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 it will take 6 hours to complete the emission test.
- <sup>d</sup> We have assumed that it will take one hour to write the test report notification.
- <sup>e</sup> We have assumed that it will take three hours to write the test report.
- <sup>f</sup> We have assumed that it will take three hours to enter information.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium Rocket Motor Fuel Firing (40 CFR Part 61, Subpart D) (Renewal)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(I)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C = AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E = CxD)	Management person-hours per year (E x 0.05)	Clerical person-hours per year (E x 0.1)	Cost <sup>b</sup> (\$)
Performance test								
Rocket motor firing	6	0.33	1.98	1	1.98	0.10	0.20	\$102.61
Report review								
Test firing report review	4	0.33	1.32	1	1.32	0.07	0.13	\$68.41
Application of construction	2	0.33	0.66	0	0	0	0	\$0
Notification of anticipated firing of rocket motor	3	0.33	0.99	1	0.99	0.05	0.10	\$51.31
Review report of test results	1	0.33	0.33	1	0.33	0.02	0.03	\$17.10
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>5</b>		<b>\$240</b>

**Note:** Totals have been rounded to 2 significant digits (where appropriate). Figures may not add exactly due to rounding.

**Assumptions:**

<sup>a</sup> 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.

<sup>b</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$62.27 (GS-13, Step 5, \$38.92 × 1.6), Technical rate of \$46.21 (GS-12, Step 1, \$28.88 × 1.6), and Clerical rate of \$25.01 (GS-6, Step 3, \$15.63 × 1.6). These rates are from the Office of Personnel Management (OPM), 2013 General Schedule, which excludes locality rates of pay.

<sup>c</sup> We have assumed that it will take six hours to perform the rocket motor firing test.

<sup>d</sup> We have assumed that it will take three hours to review the notification of anticipated firing of rocket motor report.

<sup>e</sup> We have assumed that it will take one hour to review the test results report.