

**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 0193.12, OMB Control Number 2060-0092.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Beryllium (40 CFR Part 61, Subpart C) were proposed on December 7, 1971, promulgated on April 6, 1973, and most-recently amended on February 27, 2014. The 2014 amendment added Method 29 of Part 60 as an acceptable alternative to Method 104 in Section 61.33(a) for emission testing. 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. 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 notifications, 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 containing these documents, and retain the file for at least two years following the generation date of such 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.

All of the beryllium industry facilities in the United States are owned and operated by the Beryllium industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA demands. 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).

Over the next three years, approximately 33 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. 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.

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 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 either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/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 these standards 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 these 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 these standards 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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired and these 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 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 (81 FR 26546) on May 3, 2016. One comment was received on the burden published in the Federal Register regarding the applicability of 40 CFR Part 61, Subpart C to specific manufacturing processes. EPA will consider the commenter's recommendation for applicability of Subpart C to these processes.

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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the Society for Mining, Metallurgy, and Exploration (SME), at hayden@smenet.org or (303) 948-4200; and 2) the National Mining Association (NMA), at bwatzman@nma.org or (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. The comments received and our responses may be found in Section 3(b) above and the docket for this ICR at <http://www.fdms.gov>.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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 these standards 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 the 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
Other Basic Inorganic Chemical Manufacturing	2819	325188
Nonferrous Metal (except Aluminum) Smelting and Refining	3339	331410
Other Nonferrous Metal Foundries (except Die-Casting)	3369	331529
Machine Shops	3599	332710
Hazardous Waste Treatment and Disposal	4953	562211
Materials Recovery Facilities	4953	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 reports:

Notifications	
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	61.32(b)

Notifications	
standard)	
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	
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), 61.33(e), and 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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
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 or Method 29 of Part 60.
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
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 Enforcement and Compliance History Online (ECHO) and ICIS.

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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 below in 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. Where appropriate, specific tasks and

major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 2,670 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	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 standards are both 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) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous	(B) Capital/Startup	(C) Number of	(D) Total	(E) Annual	(F) Number of	(G) Total

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

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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. These are recordkeeping costs.

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 \$64,400.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 these 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:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents ²	(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

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

² 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:

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	166

The number of Total Annual Responses is 166.

The total annual labor costs are \$275,000. 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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,670 hours. 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).

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 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 1,390 labor hours at a cost of \$64,400. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (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 an adjustment increase in the respondent burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in labor hour and cost estimates occurred because of a change in assumption. This ICR

assumes all existing sources will have to re-familiarize with the regulatory requirements each year.

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) 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) Technica l hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=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. Familiarize with regulatory requirements ^c	1	1	1	33	33	1.65	3.3	\$3,915.40
B. Required activities								
i. Initial emissions test	20	1	20	0	0	0	0	\$0
ii. Determine emission level from stack test ^d	8	1	8	23	184	9.2	18.4	\$21,831.32
iii. Monitoring of ambient beryllium concentrations	See 3E							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
i. Notification of actual startup	2	1	2	0	0	0	0	\$0
ii. Notification of stack test ^e	2	1	2	23	46	2.3	4.6	\$5,457.83
iii. Report of emission level determination/operational change ^f	8	1	8	23	184	9.2	18.4	\$21,831.32
iv. Plan for locating monitors	16	1	16	0	0	0	0	\$0
v. Report monthly ambient concentrations ^g	8	12	96	10	960	48	96	\$113,902.56

Subtotal for Reporting Requirements						1,618		\$166,938
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
i. Records of operating parameters and emissions ^h	0.25	365	91.25	10	912.5	45.63	91.25	\$108,266.76
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,049		108,267
TOTAL ANNUAL BURDEN AND COST (rounded)ⁱ						2,670		\$275,000
CAPITAL AND O&M COST (rounded)ⁱ								\$35,000
GRAND TOTAL (rounded)ⁱ								\$310,000

Assumptions:

^a 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.

^b This ICR uses the following labor rates: \$106.45 for technical, \$138.43 for managerial, and \$52.77 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 all existing respondents will have to familiarize with the regulatory requirements each year.

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

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

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

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

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

ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal)

Burden Item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=E \times 0.05)	(G) Clerical hours per year (G=E \times 0.1)	Total cost per year (\$) ^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	23	920	46	92	\$49,132
Report of emission level determination/operational change ^c	2	1	2	23	46	2.3	4.6	\$2,456.58
Report of monthly ambient concentrations ^d	2	12	24	10	240	12	24	\$12,816.96
TOTAL ANNUAL BURDEN AND COST (rounded) ^e						1,390		\$64,400

Assumptions:

^a 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.

^b This ICR uses the following labor rates: \$47.62 for technical, \$64.16 for managerial, and \$25.76 for clerical labor. These rates are from the Office of Personnel

Management (OPM), 2016 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.

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

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

^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.