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 1125.09, OMB Control Number 2060-0394.

1(b) Short Characterization/Abstract

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 amended on both October 17, 2000 (65 FR 62151) and February 27, 2014 (79 FR 11275). These regulations apply to existing and new buildings, structures facilities, or installations 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 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. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

While consultations could not confirm an active facility subject to this rule, this ICR conservatively assumes there is approximately one affected test site in the United States, which is owned and operated by the beryllium-fueled rocket industry. This ICR assumes the facility is not owned by either state, local, tribal or the Federal government, but is owned and operated by a privately-owned, for-profit commercial business. We assume that they will respond to EPA inquiries. 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 facility 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 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 D.

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. The rule does not have any continuous monitoring requirements.

The notifications required in the 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 that these standards are being met. The performance test may also be observed.

The required performance test 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* (85 FR 28003) on May 12, 2020. No comments were received on the burden published in the *Federal Register* for this renewal.

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. Approximately one respondent will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both NASA's Wallops Flight Facility, at (757) 824-1148, and Orbital ATK/Northrop Grumman, at (703) 280-2900.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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 that 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 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) 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 are either 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:

Notifications	
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, 61.44

Reports	
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:

Recordkeeping	
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

Respondent Activities
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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

The 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 the 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 and to note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in both 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The 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

The one respondent is assumed to be a large entity (i.e., large business). However, the impact on small entities (i.e., small businesses) was taken into consideration during the

development of these 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP 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. 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 9 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, and the previously-approved ICR.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$148.45 ($70.69 + 110%)
Technical	$121.46 ($57.84 + 110%)
Clerical	$60.23 ($28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics,

March 2020, “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 standard(s) are labor costs. There are no capital/startup and/or operation and maintenance costs.

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

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

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities 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 $190.

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

Managerial	$68.37 (GS-13, Step 5, $42.73 + 60%)
Technical	$50.72 (GS-12, Step 1, $31.70 + 60%)
Clerical	$27.46 (GS-6, Step 3, $17.16 + 60%)

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 respondent 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 one 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	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	1	0	0	1
2	0	1	0	0	1
3	0	1	0	0	1
Average	0	1	0	0	1

[1] New respondents 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 one.

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 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 report	1	0.33	0	0.33
			Total	1 (rounded)

The number of Total Annual Responses is one (1) response.

The total annual labor costs are $1,110. Details regarding these estimates may be found at the end of this document 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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are nine (9) hours. 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/or O&M costs to the regulated entity are $0.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be four (4) labor hours at a cost of $190; see below in 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 no change in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations: 1) these

regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in either the capital/startup or operation and maintenance (O&M) costs.

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 either 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 neither conduct nor 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)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Burden Item	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C = A x B)	Respondents per year [a]	Technical person-hours per year (E = C x D)	Management person-hours per year (E x 0.05)	Clerical person-hours per year (E x 0.1)	Cost [b] ($)
1. Applications								
A. Application for approval of construction/modification	12	0.33	3.96	0	0	0	0	$0
Notification of anticipated startup	1	0	0	0	0	0	0	$0
Notification of actual startup	1	0	0	0	0	0	0	$0
Notification of physical or operational change	1	0	0	0	0	0	0	$0
B. Source information report/application	6	0	0	0	0	0	0	$0
C. Request for ambient air monitoring alternative	18	0	0	0	0	0	0	$0
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirement	3	0.33	0.99	1	0.99	0.05	0.10	$133.56
B. Required activities								
Emissions test [c]	6	0.33	1.98	1	1.98	0.10	0.2	$267.11
Calculation of emission estimates	3	0.33	0.99	1	0.99	0.05	0.1	$133.56
Monitoring ambient beryllium concentrations	3	0.33	0.99	1	0.99	0.05	0.1	$133.56
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	$133.56
E. Write report								
Notification of performance test	1	0.33	0.33	0	0	0	0	$0
Notification of anticipated firing [d]	1	0.33	0.33	1	0.33	0.02	0.03	$44.52
Emission test report [e]	3	0.33	0.99	1	0.99	0.05	0.1	$133.56
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
Reporting Subtotal						**8**		**$979.41**
4. Recordkeeping requirements								
A. Familiarization with rule requirement	N/A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Enter information [f]	3	0.33	0.99	1	0.99	0.05	0.1	$133.56
F. Train personnel	N/A							
G. Audits	N/A							
Recordkeeping Subtotal						**1**		**$133.56**
TOTAL ANNUAL BURDEN AND COST (rounded)[g]						**9**		**$1,110**
TOTAL CAPITAL AND O&M COST (rounded)[g]								**$0**
GRAND TOTAL (rounded)[g]								**$1,110**

Assumptions:

[a] We have assumed that there will be one existing source subject to the rule, with no additional new sources per year that will become subject to the rule over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory requirements each year when the test is performed.

[b] This ICR uses the following labor rates: $148.45 per hour for Executive, Administrative, and Managerial labor; $121.46 per hour for Technical labor, and $60.23 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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 it will take 6 hours to complete the emission test.

[d] We have assumed that it will take one hour to write the test report notification.

[e] We have assumed that it will take three hours to write the test report.

[f] We have assumed that it will take three hours to enter information.

[g] 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 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 = A x B)	Plants per year [a]	Technical person-hours per year (E = C x D)	Management person-hours per year (E x 0.05)	Clerical person-hours per year (E x 0.1)	Cost [b] ($)
Performance test								
Rocket motor firing[c]	6	0.33	1.98	1	1.98	0.10	0.20	$112.63
Report review								
Application of construction	2	0.33	0.66	0	0	0	0	$0
Notification of anticipated startup	1	0	0	0	0	0	0	$0
Notification of actual startup	1	0	0	0	0	0	0	$0
Notification of physical or operational change	1	0	0	0	0	0	0	$0
Notification of performance test	1	0	0	0	0	0	0	$0
Notification of anticipated firing of rocket motor	3	0.33	0.99	1	0.99	0.05	0.10	$56.32
Review report of test results[e]	1	0.33	0.33	1	0.33	0.02	0.03	$18.77
TOTAL ANNUAL BURDEN (rounded)[f]					**4**			**$190**

Assumptions:

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

b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: $68.37 for

Managerial, $50.72 for Technical and $27.46 Clerical. These rates are from the Office of Personnel Management (OPM) 2020 General Schedule which excludes locality rates of pay.

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

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

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

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