

U.S. Environmental Protection Agency

Information Collection Request

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

OMB Control Number: 2060-0092

EPA ICR Number: 0193.14

Abstract: The Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 61, Subpart C were proposed on December 7, 1971; promulgated on April 6, 1973; and amended on February 27, 2014. 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 either caused, or to have the potential to cause, dangerous levels of beryllium in the ambient air are covered by this standard. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. 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 of these measurements and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other 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 EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

All of the beryllium industry facilities in the United States are owned and operated by the Beryllium industry (aka: the "Affected Public). The "burden" to the Affected Public may be found at the end of this document 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost -NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

There are approximately 33 beryllium facilities subject to these standards, and no additional respondents per year are expected to become subject to these same standards. None of the 33 facilities in the United States are owned by 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.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate 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. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in the 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 the standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

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

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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.

A separate document was created citing recordkeeping and reporting requirements. This NESHAP does not require electronic reporting, and the Agency has not developed specific reporting forms for this subpart for use within CEDRI. The list of rules and required reports available in CEDRI are available at <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

The notifications and reports required of respondents may be submitted to the authority by any appropriate method such as paper letter or electronic data file. Because there are no standardized forms, the required reports are mostly likely submitted via paper copy or email. Reports for which there are no standardized forms are typically submitted on company letterhead and may be accompanied by one or more appendices providing the data required by the rule.

EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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.

4. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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.

6. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The information collection is consistent with the guidelines set forth in 5 CFR 1320(d)(2) of the Paperwork Reduction Act guidelines.

7. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the Federal Register for this renewal.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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 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 33 respondents will be subject to the standard 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 the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Society for Mining, Metallurgy, & Exploration at (303) 948-4200 and the National Mining Association at (202) 463-2600.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 33 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. Note that of a total of approximately 236 existing sources, we assume approximately 10 sources have elected to comply with the rule by monitoring ambient air beryllium concentrations, while the remaining 226 sources have elected to comply by conducting a one-time-only stack test. We also have assumed that 10 percent of the 226 sources (i.e., 23 respondents) will engage in operational changes that will require them to repeat stack testing and to carry out subsequent recordkeeping and reporting requirements.

8. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

9. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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 (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).

10. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes, and behavior) will not be included in the information collections covered by this ICR.

11. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
 - *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
 - *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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12a. Respondents/NAICS Codes

***Special Note: "Table 1" and "Table 2," (as subsequently identified), are located in the Appendices section of this document.**

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	325180
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

Based on our research for this ICR, on average over the next three years, approximately 33 existing respondents will be subject to the standard. 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 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 ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	33	0	0	33
2	0	33	0	0	33
3	0	33	0	0	33
Average	0	33	0	0	33

^aNew 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 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.

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

12b. Information Requested

In this ICR, all the data that are 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), §61.33(b)
Notification requesting approval to meet an ambient concentration limit on beryllium in the vicinity of the stationary source (alternative standard)	§61.32(b)
Reports	
Report of emission test results	§61.13(f), §61.33(d)
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), §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), §61.34(c)

12c. Respondent Activities

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 (40 CFR Part 61, Subpart C) (Renewal).

Respondent Activities
Familiarization with the regulatory requirements.

Respondent Activities
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 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.

12d. Respondent Burden Hours and Labor Costs

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,670 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

This ICR uses the following labor rates:

- Managerial \$163.17 (\$77.70 + 110%)
- Technical \$130.28 (\$62.04 + 110%)
- Clerical \$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

The total annual labor costs are \$336,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

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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.

12. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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 monitors and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ¹	(G) Total O&M, (E X F)
Ambient monitor	\$0	0	\$0	\$7,243	10	\$72,432
Totals (rounded) ^c			\$0			\$72,400

^a Costs have been increased from 2001 to 2022 \$ using the CEPCI Equipment Cost Index.

^b 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.

^c 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 \$72,400. 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 \$72,400. These are recordkeeping costs.

The total annual capital/startup and O&M costs to the regulated entity are \$72,400.

13. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. 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.

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. The monthly reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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. 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.

14b. Agency Costs

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 \$73,700.

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

- Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%)
- Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%)
- Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal).

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.

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

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. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (September 2022) to calculate respondent burden costs. There is an increase in operation & maintenance costs due to an adjustment to increase from 2001 to 2022 \$ using the CEPCI Equipment Cost Index.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Results from this ICR are not published formally. They are used to calculate agency-level accomplishments and site-specific impacts on publicly available EPA websites.

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

EPA does not seek any exceptions to the topics for the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”

Appendix

Table 1: Annual Respondent Burden and Cost - NESHAP for Beryllium (40 CFR Part 61, Subpart C) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year^a	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=E\times0.05)	(G) Clerical hours per year (G=E\times0.1)	(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	\$4,785.31
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	\$26,681.75
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	\$6,670.44
iii. Report of emission level determination/operational change	8	1	8	23	184	9.2	18.4	\$26,681.75

^f								
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	\$139,209.12
Subtotal for Reporting Requirements						1,618		\$204,028
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
i. Records of operating parameters and emissions ^h	0.25	365	91.25	10	912.5	45.63	91.25	\$132,321.17
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,049		132,321
TOTAL LABOR BURDEN AND COST (rounded) ⁱ						2,670		\$336,000
TOTAL CAPITAL AND O&M COST (rounded) ⁱ								\$72,400
GRAND TOTAL (rounded) ⁱ								\$408,000

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: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^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) Technic al person- hours per occurre nce	(B) No. of occurre nces per respon dent per year	(C) Technic al person- hours per respon dent per year (C=AxB)	(D) Respon dents per year ^a	(E) Techni cal hours per year (E=Cx D)	(F) Manage ment hours per year (F=Ex0.0 5)	(G) Clerica l hours per year (G=Ex 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	\$56,242.36
Report of emission level determination/operational change ^c	2	1	2	23	46	2.3	4.6	\$2,812.12
Report of monthly ambient concentrations ^d	2	12	24	10	240	12	24	\$14,671.92
TOTAL (rounded)^e						1,390		\$73,700

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 The cost is based on the following labor rates: Managerial rate of \$73.456 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.512 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.504 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.