

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD (Renewal))

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) were proposed on January 9, 2003, promulgated on July 30, 2004, and amended on February 16, 2006. This regulation covers new and existing plywood and composite wood products (PCWP) facilities. Plywood and/or composite products are manufactured by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber with resin, generally under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite products include, but are not limited to, plywood, veneer, particleboard, oriented strand board, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber and glue-laminated beams.

A PCWP manufacturing facility is a major source of hazardous air pollutant (HAP) emissions either in and of itself, or because it is located with other major sources of HAP. A major source of HAP is a plant site that emits, or has the potential to emit, any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. Owners or operators are required to install, operate, and maintain a continuous monitoring system (CMS) which could be either a continuous parameter monitoring system (CPMS) or a continuous emission monitoring system (CEMS) depending on which monitoring system they choose. This information is being collected to assure compliance with part 63, subpart DDDD.

In general, all NESHAP standards require initial notifications, performance tests, and compliance status reports. Owners or operators 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. Semiannual reports are also required. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

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

Over the next three years, an average of 228 facilities per year will be subject to the standard. This figure includes four new sources per year.

There are 228 plywood and composite products facilities in the United States, which are all publicly owned and operated by the plywood and composite industry. None of the 228 facilities in the United States are owned by either state, local, tribal or the Federal Government, they are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD). The Federal Government burden does not include work performed by federal employees only work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD).

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or 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, HAP emissions from PCWP manufacturing facilities which include acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde

cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart DDDD.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and the standard are being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart DDDD.

3(a) Nonduplication

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 their 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, no duplication exists.

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 (71FR 58853) on October 5, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Over the next three years, an average of 228 facilities per year will be subject to the standard, with an additional four sources per year becoming subject to the standard. We have also determined that approximately 20 percent of the respondents are reporting electronically. In estimating the affected number of sources and the growth rate of plywood and composite manufacturing facilities subject to this standard, EPA contacted Mr. Colin McCown, at (205) 733-4077, from the American Wood Preservers Association (AWP), and Mr. Gary D. Gramp, at (703) 435-2900, from the Hardwood Plywood and Veneer Association (HPVA). We referenced the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate. We also consulted with EPA's Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 (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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are plywood and composite facilities. The United States Standard Industrial Classification (SIC) codes which correspond to the North American Industry Classification System (NAICS) code could be found in the following table:

(40 CFR part 63, subpart DDDD)	SIC Codes	NAICS Codes
Sawmills and Planing Mills, General (kiln drying)	2421	321999
Hardwood Veneer and Plywood	2435	321211
Softwood Veneer and Plywood	2436	321212
Reconstituted Wood Products	2493	321219
Structural Wood Members, NEC (trusses)	2439	321213

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Products (40 CFR Part 63, subpart DDD).

A source must make the following reports:

Notifications	
Initial notification for existing sources	63.9(b)(2), 63.2280(b)
Notification of performance test	63.7(b)(1), 63.2280(c)
Notification of compliance status	63.9(h)(2)(ii), 63.2280(d)
Request for routine control device maintenance exemption	63.2280(e)
Emissions averaging plan	63.2280(f)

Notifications	
Notification of change of control system, processing unit in your emissions averaging plan, monitoring parameter, or value of a monitoring parameter	63.2280(g)
Reports	
Semiannual compliance report	63.2281(b)
Start-up, shutdown, and malfunction plan	63.10(d)(5)(2)

A source must keep the following records:

Recordkeeping	
Documentation supporting any initial notification or notification of compliance status	63.63.10(b)(2)(xiv), 63.2282(a)(1)
Startup, shutdown, malfunction plan	63.63.6(e)(3)(iii)-(v), 63.2282(a)(2)
Records relating to control device maintenance and documentation of routine control device maintenance exemption	63.2282(a)(3)
Records of performance test and performance evaluations	63.10(b)(2)(viii), 63.2282(a)(4)
Records for each CEMS for emission limitations and records related to the work practice requirements	63.10(b)(2)(vi)-(xi), 63.8(d)(3), 63.8(f)(6)(i), 63.2282(b)-(c)
Records of all information required to calculate emission debits and credits	63.2282(d)
Maintain records for 5 years	63.10(b)(1), 63.2283(d)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 20 percent of the respondents use electronic reporting.

Respondent Activities	
Read instructions.	

Respondent Activities
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 308, 316, 320 tests, and repeat performance tests if necessary.
Write the notification 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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. 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 semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters, EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD).

6. Estimating the Burden and Cost of the Collection

Table 1 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 12,732 (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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

Managerial	\$105.36	(\$50.17 + 110%)
Technical	\$92.09	(\$43.85 + 110%)
Clerical	\$47.25	(\$22.50 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2006, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

For new sources, there are no capital/startup costs required for the purchase or the installation of equipment, because respondents comply by employing pollution prevention measures and have the necessary process parameter monitors already in place, however, there are capital/startup costs associated with the acquisition of recording equipment to collection data for reporting purposes. The annual operation and maintenance costs shown below reflect the ongoing costs to maintain the recording equipment and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous monitoring system	\$1,880	4	\$7,520	\$70.01	224	\$15,682

The total capital/startup costs for this ICR are \$7,520. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs consists of photocopying, and postage are \$15,682 (rounded). 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 \$23,202.

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 \$96,249.

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

Managerial	\$58.18	(GS-13, Step 5, \$36.36 + 60%)
Technical	\$43.17	(GS-12, Step 1, \$26.98 + 60%)
Clerical	\$23.36	(GS-6, Step 3, \$14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) A2007 General Schedule¹ which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD), below.

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 228 existing respondents will be subject to the standard. It is estimated that an additional four respondents per year will become subject. The overall average number of respondents, as shown in the table below is 228 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents	(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	4	220	0	0	224
2	4	224	0	0	228
3	4	228	0	0	232
Average	4	224	0	0	228

¹ New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 228.

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 $E=(B \times C)+D$
Notification of construction/reconstruction	4	1	n/a	4
Notification of anticipation startup	4	1	n/a	4
Notification of actual startup	4	1	n/a	4
Notification of applicability of standard	4	1	n/a	4
Emissions averaging plan	0	1	n/a	0
Request for routine control system maintenance exemption	4	1	n/a	4
Notification of initial performance test	4	1	n/a	4
Notification of compliance status with performance test	4	1	n/a	4
Notification of compliance status without performance test	1	1	n/a	1
Initial compliance report with no deviations	4	1	n/a	4
Initial compliance report with deviations	0	1	n/a	0
Initial compliance startup, shutdown, malfunction report	4	1	n/a	4
Initial compliance control system maintenance report	4	1	n/a	4
Initial compliance emissions averaging report	0	1	n/a	0
Semiannual report with no deviations	198	2	n/a	396
Semiannual report with deviations	22	2	n/a	44
Semiannual startup, shutdown, malfunction report	22	2	n/a	44
Semiannual control system maintenance report	22	2	n/a	44
Semiannual emissions averaging report	0	0	n/a	0
			Total	569

The number of Total Annual Responses is 569.

The total annual labor costs are \$1,207,585. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD), below.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$1,207,585. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$23,202. 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 2,286 labor hours at a cost of \$96,249. See Table 2. Annual Agency Burden and Cost: NESHP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD), below.

6(f) Reasons for Change in Burden

There is an increase of 8,040 hours in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens and a reduction in the capital/startup and O&M costs. The increase/decreases are not due to program changes. The change in the burden and cost estimates has occurred because the standard has been in effect for more than three years and the requirements are different during initial compliance (new facilities) as compared to on-going compliance (existing facilities). The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes purchasing monitoring equipment, conducting performance test(s) and establishing recordkeeping systems. This ICR reflects the on-going burden and costs for existing facilities. Activities for existing source include continuously monitoring of pollutants and the submission of semiannual reports. In addition, there are a small number of new facilities that are in the initial compliance phase described above. The overall result is an increase in burden hours and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 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's 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-2006-0725. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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), EPA West, Room 3334, 1301 Constitution Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0725 and OMB Control Number 2060-0552 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

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 person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
No deviations ⁱ	8	2	16	198	3,168	158.4	316.8	\$323,398.94
Deviation ⁱ	24	2	48	22	1,056	52.8	105.6	\$107,799.65
Startup, shutdown, malfunction report ^{i, j}	8	2	16	22	352	17.6	35.2	\$35,933.22
Control system maintenance report ^k	8	2	16	22	352	17.6	35.2	\$35,933.22
Emissions averaging report ^l	20	1	20	0	0	0	0	\$0
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	N/A							
C. Implement Activities	N/A							
D. Develop record system ^m	40	1	40	4	160	8	16	\$18,350.32
E. Develop startup, shutdown, malfunction plan ⁿ	100	1	100	4	400	20	40	\$45,875.80
F. Time to enter information								
Records of startup, shutdown, and malfunction	1.5	52	78	16	1,248	62.4	124.8	\$143,132.50
Records of continuous compliance ^o								
Record parameters/information	0.25	365	91	16	1,456	72.8	145.6	\$166,987.91
Compile data	24	2	48	16	768	38.4	76.8	\$88,081.54
Enter/verify information for semiannual reports	16	2	32	16	512	25.6	51.2	\$58,721.02
Records of control system maintenance	See 3E							
Records of emissions averaging credit/debts	See 3E							
G. Calibration of CMS ^p	16	1	16	16	256	12.8	25.6	\$29,360.51
H. Time to train personnel ^q	40	1	40	4	160	8	16	\$18,350.32
I. Time for refresher training for personnel ^r	16	1	16	12	192	9.6	19.2	\$22,020.38
J. Time for audits	N/A							
Subtotals Labor Burden and cost					11,071.20	553.56	1,107.12	\$1,207,585.24
TOTAL LABOR BURDEN AND COST (rounded)						12,732		\$1,207,585

Assumptions:

- ^a We have assumed that the average number of major sources that will be subject to the rule will be the 228 existing sources. There will be four additional new sources per year that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$105.36 per hour for Executive, Administrative, and Managerial labor; \$92.09 per hour for Technical labor, and \$47.25 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2006, ATable 2. Civilian Workers, by occupational and industry group. @ The rates are from column 1, ATotal 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 this is a one-time only occurrence after the facility becomes subject to the rule.
- ^d We have assumed that no existing facilities will choose to use the emission averaging plan because all facilities we assume will install control systems and new facilities are not allowed to use emissions averaging.
- ^e We have assumed that all facilities will submit a request for routine control device maintenance exemption.
- ^f We have assumed that all new facilities will comply by conducting performance test(s). The notification of compliance status includes the report of the performance test(s).
- ^g We have assumed that 1 new facility per year with softwood veneer dryers will submit a notification of compliance status without performance tests.
- ^h We have assumed that the respondents' compliance date is in the first half of the year, so respondents will submit one compliance report the first year that they start complying with the rule and two compliance reports the following year.
- ⁱ We have assumed that 90 percent of facilities will have no deviation, and 10 percent will have deviation.
- ^j We have assumed that 10 percent of facilities will report any action taken during startup, shutdown, malfunction that are not consistent with the SSMP.
- ^k We have assumed that 10 percent of the facilities will submit control device maintenance report.
- ^l We have assumed that no existing facilities will choose to use the emissions averaging option, and since new facilities are not allowed to use emissions averaging, there will be not need to obtain emissions averaging report.
- ^m We have assumed that each new respondent will take a total of 40 hours to develop a record system for recording parameter monitoring information.
- ⁿ We have assumed that it will take 80 hours to draft the startup, shutdown, malfunction plan and another 20 hours to review/revisions, for a total of 100 hours.
- ^o Records of continuous compliance includes records of CMS data for emission limitations and various records for work practice standards.
- ^p We have assumed that calibration of the CMS will require eight hours per year for each monitor, assuming two CMS per facility for a total of 16 hours per year.
- ^q We have assumed that it will take 40 hours for each new personnel to be trained.
- ^r We have assumed that it will take 16 hours for personnel to complete refresher training.

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
report ^h								
No deviations ⁱ	2	1	2	22	44	2.2	4.4	\$2,130.26
Deviations ⁱ	8	1	8	198	1,584	79.2	158.4	\$76,689.36
Startup, shutdown, and malfunction reports ^j	2	1	2	22	44	2.2	4.4	\$2,130.26
Control system maintenance report ^k	2	1	2	22	44	2.2	4.4	\$2,130.26
Emissions averaging report ^c	8	1	8	0	0	0	0	\$0
Subtotals Labor Burden and cost					1,988	99.4	198.8	\$96,249.02
TOTAL ANNUAL BURDEN AND COST (rounded)						2,286		\$96,249

Assumptions:

^a We have assumed that the average number of major sources that will be subject to the rule will be the 228 existing sources. There will be four 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 labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$58.18 (GS-13, Step 5, \$36.36 x 1.6), Technical rate of \$43.17 (GS-12, Step 1, \$26.98 x 1.6), and Clerical rate of \$23.36 (GS-6, Step 3, \$14.60 x 1.6). These rates are from the Office of Personnel Management (OPM) A2007 General Schedule@ which excludes locality rates of pay.

^c We have assumed that no existing facilities will choose to use the emission averaging plan because all facilities we assume will install control systems and new facilities are not allowed to use emissions averaging.

^d We have assumed that all new facilities will submit a request for routine control system maintenance exemption.

^e We have assumed that it will take each of the four respondents two hours to review the notification of initial performance test.

^f We have assumed that all new facilities will conduct an initial performance test(s) and submit a notification of compliance status that includes the report of the performance test(s).

^g We have assumed that one new facility per year with softwood veneer dryers will submit a notification of compliance status without performance tests.

^h We have assumed that the facilities compliance date is in the first half of the year, so facilities will submit one compliance report the first year that they start complying with the rule and two compliance reports the years that follow.

ⁱ We have assumed that 90 percent of facilities will have no deviations, and 10 percent will have deviations.

^j We have assumed that facilities will report any actions taken during a startup, shutdown, or malfunction that are consistent with the SSMP.

^k We have assumed that 10 percent of the facilities will submit a control device maintenance report

