

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (Renewal), (40 CFR Part 63, Subpart MM) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (Renewal), (40 CFR Part 63, Subpart MM), EPA ICR Number 1805.05, OMB Control Number 2060-0377.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills published at 40 CFR part 63, subpart MM were proposed on April 15, 1998, and promulgated on January 12, 2001. These regulations apply to existing and new chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills where the total hazardous air pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP; or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of the proposal. This information is being collected to ensure compliance with 40 CFR part 63, subpart MM.

In general, all NESHAP standards require initial notifications, performance tests, and periodic 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. These notifications, reports, and records are essential in determining compliance and are required of all sources subject to NESHAP standards.

Any owner or operator subject to the provisions of this part shall maintain a file of these documents, and retain the file for at least five years following the date of such notifications, 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.

Approximately 130 sources are currently subject to the standard, and it is estimated that no additional sources will become subject to the regulation in the next three years.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

The term, “Affected Public”, applies to private sector businesses or other for-profits that perform polymeric coating of supporting substrates. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills (attached). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Annual Agency Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills (attached).

## **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 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, acetaldehyde, benzene, formaldehyde, hydrochloric acid (HCl), methanol, methyl ethyl ketone, and toluene hazardous air pollutant (HAP) emissions from chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semicheical pulp mills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR part 63, subpart MM.

### **2(b) Practical Utility/Users of the Data**

The control of emissions of HAP from chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semicheical pulp mills requires not only the installation of properly designed equipment but also the operation and maintenance of that equipment. Emissions of HAP from chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semicheical pulp mills are the result of the operation of the affected mills. These

standards rely on the capture and/or reduction of HAP emissions by recovery furnaces, smelt dissolving tanks (SDTs), lime kilns, or soda or sulfite combustion units. Required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. Then, the reviewing authority may inspect the source to ensure that the pollution control devices are properly installed and operated and that the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance on an on-going basis with these standards, as required by the Clean Air Act. In addition, the information collected from recordkeeping and reporting requirements is used for targeting inspections, and is of sufficient quality to be used as evidence in court.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The recordkeeping and reporting requested is required under 40 CFR part 63, subpart MM.

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent 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 Office of Management and Budget (OMB)**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

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

For this ICR renewal, EPA contacted Mr. Timothy Hunt of the American Forest and Paper Association, trade organization for the industry, on July 12, 2007, to request voluntary assistance in providing information related to the burden associated with this ICR. However, no comments were received. EPA also consulted its Air Facility System (AFS) to identify sources subject to the standard.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the required 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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

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

These standards require affected facilities 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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

### **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**

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 owners or operators of chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills.

| <b>Standard</b>    | <b>SIC Codes</b>        | <b>NAICS Codes</b> |
|--------------------|-------------------------|--------------------|
| 40 CFR, subpart MM | 2611 (pulp mills)       | 32211              |
|                    | 2621 (paper mills)      | 32212              |
|                    | 2631 (paperboard mills) | 32213              |

#### 4(b) Information Requested

##### (i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart MM.

A source must make the following reports:

| <b>Notification Reports</b>  |  |
|--|--|
| <b>Requirement</b>   | <b>Regulation Reference</b>              |
| Initial notifications, reports of startups, shutdowns, malfunctions, construction/reconstruction, and modification   | 63.867(a), 63.5, 63.9(b), 63.10(d)(5)    |
| Notification and report of performance tests and results   | 63.867(a), 63.7(b), 63.9(e), 63.10(d)(2) |
| Notification of initial continuous monitoring system (CMS)/continuous opacity monitoring system (COMS) demonstration   | 63.867(a), 63.9(g)                       |
| Notification and report of compliance status   | 63.867(b)(1), (2), 63.9(h)               |
| Reporting results of CMS/COMS demonstration  | 63.867(a), 63.10(e)(2)                   |
| Excess emissions reports (quarterly and semiannual)  | 63.867(c), 63.10(e)(3)                   |
| Certification that a nondirect contact evaporator (NDCE) recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in 63.862(c)(1) | 63.866(c)(6)                             |

A source must keep the following records:

| <b>Recordkeeping</b>                          |   |
|---|---|
| Five-year retention of records                | 63.10(b)(1)                                 |
| Startup, shutdown, and malfunction plan       | 63.866(a), 63.6(e)(3)                       |
| Records of startup, shutdown, and malfunction | 63.6(e)(3)(iii)-(iv),<br>63.10(b)(2)(i)-(v) |
| Records of performance tests                  | 63.10(b)(2)(viii)                           |

| <b>Recordkeeping</b>   |                  |
|--|------------------|
| Documentation supporting initial notifications and notifications of compliance status  | 63.10(b)(2)(xiv) |
| Records of exceedances requiring corrective action and violations  | 63.866(b)        |
| Black liquor solids firing rates for all recovery furnaces and semichemical combustion units   | 63.866(c)(1)     |
| Lime production rates for all lime kilns   | 63.866(c)(2)     |
| All parameter monitoring data required in section 63.864   | 63.866(c)(3)     |
| Supporting calculations for compliance determinations made under section 63.865(a) through (e)   | 63.866(c)(4)     |
| Compliant monitoring parameter ranges established for each affected source   | 63.866(c)(5)     |
| Certification that a nondirect contact evaporator (NDCE) recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in section 63.862(c)(1) | 63.866(c)(6)     |

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

### **ii. Respondent Activities**

| <b>Respondent Activities</b>  |
|---|
| Read instructions.  |
| Install, calibrate, maintain, and operate compliance monitoring system (CMS) for opacity, or for pressure drop and liquid supply pressure for wet scrubber.                     |
| Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 25A, 29, or 308 as applicable, and repeat performance tests if necessary. |
| Write the notifications and reports listed above.   |
| Enter information required to be recorded above.  |
| Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.       |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.  |

| <b>Respondent Activities</b>   |
|--|
| Develop, acquire, install, and utilize technology and systems for the purpose of 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.  |
| Transmit, or otherwise disclose the information.   |

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

### **5(a) Agency Activities**

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

| <b>Agency Activities</b>  |
|---|
| Observe initial performance tests and repeat performance tests if necessary.  |
| Review notifications and reports, including performance test reports, excess emissions reports, startup, shutdown, malfunction plan, and quality control plan for CMS required to be submitted by industry. |
| Audit facility records.   |
| Input, analyze, and maintain data in the Air Facility System (AFS).   |

### **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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. 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 the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for over 100,000 industrial and government-owned facilities. EPA uses the AFS 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 recordkeeping and reporting requirements were selected within the context of this specific subpart and the specific process equipment and pollutant. The requirements reflect the burden on small businesses. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. Although the recordkeeping and reporting requirements are the same for small and larger businesses, the Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 1a: One-Time Annual Respondent Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM), and in Table 1b: Recurrent Annual Respondent Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a and 1b 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. Where appropriate, specific tasks and major assumptions have been identified. To minimize burden, much of the information the EPA would need to determine compliance would be recorded and retained onsite at the facility. Such information would be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to the EPA. In addition, in many cases the EPA has selected parameters for monitoring that are already monitored by the industry for other purposes. 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 150,043 hours (Total Labor Hours calculated from Tables 1a and 1b as follows).



| <b>Annual Burden to Industry</b> | <b>Total Burden, Hours</b> | <b>Total Costs, \$</b> |
|----------------------------------|----------------------------|------------------------|
| Table 1a                         | 2,279                      | 116,671                |
| Table 1b                         | 147,764                    | 7,563,627              |
| Total                            | 150,043                    | 7,680,298              |

These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

## **6(b) Estimating Respondent Costs**

### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

|            |         |                  |
|------------|---------|------------------|
| Managerial | \$95.32 | (\$45.39 + 110%) |
| Technical  | \$64.60 | (\$30.76 + 110%) |
| Clerical   | \$40.09 | (\$19.09 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "Table 10: Private Industry, 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 types 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.

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

| <b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b> |  |  |  |   |   |                              |
|--|--|--|--|---|---|------------------------------|
| (A)<br>Continuous<br>Monitoring<br>Device                            | (B)<br>Capital/<br>Startup Cost<br>for One<br>Respondent | (C)<br>Number of<br>New<br>Respondents | (D)<br>Total<br>Capital/Startu<br>p Cost,<br>(B X C) | (E)<br>Annual<br>O&M Costs<br>for One<br>Respondent | (F)<br>Number of<br>Respondents<br>with O&M | (G)<br>Total O&M,<br>(E X F) |
| COMS <sup>1</sup>  | \$41,000   | 3                                      | \$123,000  | 8,000   | 108   | \$864,000                    |
| CPMS <sup>1</sup>  | \$0  | 0                                      | \$0  | 0   | 0   | \$0                          |
| <b>Total</b>   | <b>\$41,000</b>  | <b>3</b>                               | <b>\$123,000</b>                                     | <b>8,000</b>  | <b>108</b>                                  | <b>\$864,000</b>             |

<sup>1</sup> No costs are included for continuous opacity monitoring systems (COMS) installed for recovery furnaces or for continuous parameter monitoring systems (CPMS) because the monitoring equipment is already required for compliance with the New Source Performance Standards (NSPS) for Kraft Pulp Mills (40 CFR Subpart BB).

The total capital/startup costs for this ICR are \$123,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$864,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$987,000.

### **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 \$53,097.

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

|            |         |                                |
|------------|---------|--------------------------------|
| Managerial | \$54.66 | (GS-13, Step 5, \$34.16 x 1.6) |
| Technical  | \$40.56 | (GS-12, Step 1, \$25.35 x 1.6) |
| Clerical   | \$21.95 | (GS-6, Step 3, \$13.72 x 1.6)  |

These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM), below.

### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

Based on our research for this ICR, approximately 130 existing sources are currently subject to the standard. It is estimated that an additional zero sources per year will become subject to the standard in the next three years.

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

| <b>Number of Respondents</b> |   |                                       |   |   |  |
|------------------------------|---|---------------------------------------|---|---|--|
|                              | Respondents That Submit Reports               |                                       | Respondents That Do Not Submit Any Reports  |   |  |
| Year                         | (A)<br>Number of New Respondents <sup>1</sup> | (B)<br>Number of Existing Respondents | (C)<br>Number of Existing Respondents That Keep Records But Do Not Submit Reports | (D)<br>Number of Existing Respondents That Are Also New Respondents | (E)<br>Number of Respondents (E=A+B+C-D) |
| 1                            | 0   | 130                                   | 0   | 0   | 130                                      |
| 2                            | 0   | 130                                   | 0   | 0   | 130                                      |
| 3                            | 0   | 130                                   | 0   | 0   | 130                                      |
| Average                      | 0   | 130                                   | 0   | 0   | 130                                      |

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

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 130.

The total number of annual responses per year is calculated using the following table:

| <b>Total Annual Responses</b>                 |                              |                            |   |   |
|---|------------------------------|----------------------------|---|---|
| (A)<br>Information Collection Activity        | (B)<br>Number of Respondents | (C)<br>Number of Responses | (D)<br>Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E)<br>Total Annual Responses E=(BxC)+D |
| Notification of construction/reconstruction   | 7                            | 1                          | 0   | 7                                       |
| Notification of actual startup                | 7                            | 1                          | 0   | 7                                       |
| Notification of applicability of the standard | 7                            | 1                          | 0   | 7                                       |
| Notification of initial performance test      | 7                            | 1                          | 0   | 7                                       |
| Notification of performance evaluation        | 7                            | 1                          | 0   | 7                                       |

| <b>Total Annual Responses</b>   |                                 |                               |   |  |
|---|---------------------------------|-------------------------------|---|--|
| (A)<br>Information Collection<br>Activity                               | (B)<br>Number of<br>Respondents | (C)<br>Number of<br>Responses | (D)<br>Number of Existing<br>Respondents That<br>Keep Records But<br>Do Not Submit<br>Reports | (E)<br>Total Annual<br>Responses<br>$E=(B \times C)+D$ |
| Notification of compliance status                                       | 7                               | 1                             | 0   | 7  |
| Quarterly report of monitoring exceedances and periods of noncompliance | 7                               | 4                             | 0   | 28   |
| Semiannual report of no exceedances                                     | 123                             | 2                             | 0   | 246  |
|   |                                 |                               | Total   | 316  |

The number of Total Annual Responses is 316.

The total annual labor costs are \$7,680,298. Details regarding these estimates may be found in Table 1a: One-Time Annual Respondent Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM), and in Table 1b: Recurrent Annual Respondent Burden and Cost, NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM).

The total annual capital/startup and O&M costs to the regulated entities are \$987,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 1,037 labor hours at a cost of \$53,097. See Table 2: Annual Agency Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (Renewal), (40 CFR Part 63, Subpart MM), 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 1a and 1b, and 2, respectively, and summarized below.

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

The total annual labor costs are \$7,680,298. Details regarding these estimates may be found in Table 1a: One-Time Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM), and in Table 1b: Recurrent Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and

Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 475 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$987,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

## **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 1,037 labor hours at a cost of \$53,097. See Table 2: Annual Agency Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM), below.

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

There is no change in the labor hours or cost in this ICR compared to the previous ICR. 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. Secondly, the growth rate for the industry is zero, 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, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 475 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-2007-0035. 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), EPA 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) 566-1927. 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-2007-0035 and OMB Control Number 2060-0377 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 1a. One-Time Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Burden item <sup>a</sup>                        | (A)<br>Person-hours per occurrence | (B)<br>Number of occurrences per year | (C)<br>Technical person-hours per respondent per year (C=AxB) | (D)<br>Respondents per year | (E)<br>Technical person-hours per year (E=CxD) | (F)<br>Management person-hours per year (F=Ex0.05) | (G)<br>Clerical person-hours per year (G=Ex0.1) | (H)<br>Respondent person-hours per year (H=E+F+G) | (I)<br>Cost, \$ <sup>b</sup> |
|---|------------------------------------|---------------------------------------|---|-----------------------------|--|--|---|---|------------------------------|
| 1. Applications                                 | N/A                                |                                       |   |                             |  |  |   |   |                              |
| 2. Surveys and Studies                          | N/A                                |                                       |   |                             |  |  |   |   |                              |
| 3. Reporting Requirements                       |                                    |                                       |   |                             |  |  |   |   |                              |
| A. Read instructions                            | 2                                  | 1                                     | 2   | 7 <sup>c</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |
| B. Required activities                          | included in 3E                     |                                       |   |                             |  |  |   |   |                              |
| C. Create information                           | included in 3E                     |                                       |   |                             |  |  |   |   |                              |
| D. Gather existing information                  | included in 3E                     |                                       |   |                             |  |  |   |   |                              |
| E. Write report                                 |                                    |                                       |   |                             |  |  |   |   |                              |
| \$Notification of construction/reconstruction   | 2                                  | 1                                     | 2   | 7 <sup>c</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |
| \$Notification of actual startup                | 2                                  | 1                                     | 2   | 7 <sup>c</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |
| \$Notification of applicability of the standard | 2                                  | 1                                     | 2   | 7 <sup>c</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |
| \$Notification of initial performance test      | 2                                  | 1                                     | 2   | 7 <sup>f</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |
| \$Notification of performance evaluation        | 2                                  | 1                                     | 2   | 7 <sup>c</sup>              | 14   | 0.7  | 1.4   | 16.1  | 824                          |

TABLE 1a. One-Time Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Burden item <sup>a</sup>   | (A)<br>Person-<br>hours per<br>occurrence | (B)<br>Number of<br>occurrences<br>per year | (C)<br>Technical<br>person-hours<br>per<br>respondent<br>per year<br>(C=AxB) | (D)<br>Respondent<br>s per year | (E)<br>Technical<br>person-<br>hours per<br>year<br>(E=CxD) | (F)<br>Management<br>person-hours<br>per year<br>(F=Ex0.05) | (G)<br>Clerical<br>person-<br>hours per<br>year<br>(G=Ex0.1) | (H)<br>Respondent<br>person-<br>hours per<br>year<br>(H=E+F+G) | (I)<br>Cost, \$ <sup>b</sup> |
|--|---|---|--|---------------------------------|---|---|--|--|------------------------------|
| \$Notification of compliance status  | 80  | 1   | 80   | 7 <sup>c</sup>                  | 560   | 28.0  | 56.0   | 644.0  | 32,965                       |
| 4. Recordkeeping Requirements  |   |   |  |                                 |   |   |  |  |                              |
| A. Read instructions   | Included in 3A                            |   |  |                                 |   |   |  |  |                              |
| B. Plan activities   | Included in 4D                            |   |  |                                 |   |   |  |  |                              |
| C. Implement activities  | Included in 4D                            |   |  |                                 |   |   |  |  |                              |
| D. Develop record system   | 40 <sup>g</sup>                           | 1   | 40   | 7 <sup>c</sup>                  | 280   | 14  | 28.0   | 322.0  | 16,482                       |
| E. Develop startup, shutdown, and malfunction plan   | 100 <sup>h</sup>                          | 1   | 100  | 7 <sup>c</sup>                  | 700   | 35  | 70.0   | 805.0  | 41,206                       |
| F. Time to enter information   |   |   |  |                                 |   |   |  |  |                              |
| \$Records and documentation of supporting calculations for compliance determinations   | 8   | 1   | 8  | 7 <sup>c</sup>                  | 56  | 2.8   | 5.6  | 64.4   | 3,296                        |
| \$Records of compliant monitoring parameter ranges   | 2   | 1   | 2  | 7 <sup>c</sup>                  | 14  | 0.7   | 1.4  | 16.1   | 824                          |
| \$Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard for kraft and soda recovery furnaces | 2   | 1   | 2  | 4 <sup>i</sup>                  | 8   | 0.4   | 0.8  | 9.2  | 471                          |



TABLE 1a. One-Time Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Burden item <sup>a</sup>                                   | (A)<br>Person-<br>hours per<br>occurrence | (B)<br>Number of<br>occurrences<br>per year | (C)<br>Technical<br>person-hours<br>per<br>respondent<br>per year<br>(C=AxB) | (D)<br>Respondent<br>s per year | (E)<br>Technical<br>person-<br>hours per<br>year<br>(E=CxD) | (F)<br>Management<br>person-hours<br>per year<br>(F=E $\times$ 0.05) | (G)<br>Clerical<br>person-<br>hours per<br>year<br>(G=E $\times$ 0.1) | (H)<br>Respondent<br>person-<br>hours per<br>year<br>(H=E+F+G) | (I)<br>Cost, \$ <sup>b</sup> |
|--|---|---|--|---------------------------------|---|--|---|--|------------------------------|
| G. Time to train personnel                                 | 40 <sup>j</sup>                           | 1   | 40   | 7 <sup>c</sup>                  | 280   | 14   | 28.0  | 322.0  | 16,482                       |
| ONE-TIME BURDEN AND COST (SALARY) NATIONWIDE: <sup>k</sup> |   |   |  |                                 | 1,982   | 99   | 198   | 2,279  | \$116,671                    |

Footnotes

<sup>a</sup>See Section 4(b)(ii) for a further explanation of respondent activities.

<sup>b</sup>Costs assume a rate of \$64.60/hour for technical labor, \$95.32/hour for management labor, and \$40.09/hour for clerical labor.

<sup>c</sup>Assumes four existing kraft pulp mills will each install one new recovery furnace and smelt dissolving tank (SDT) and three existing kraft pulp mills will each install one new lime kiln each year.

<sup>d</sup>Person-hours per occurrence are based on the cost of the performance evaluation divided by the composite hourly labor rate. The performance evaluation costs are \$500 for each CPMS and \$1,400 for each COMS.

<sup>e</sup>Assumes three new SDT=s will be required to conduct a continuous parameter monitoring system (CPMS) performance evaluation each year. Assumes four new recovery furnaces and three new lime kilns will be required to conduct a continuous opacity monitoring system (COMS) performance evaluation each year. Assumes five percent of the CPMS/COMS performance evaluations must be repeated due to the failure of the first performance evaluation.

<sup>f</sup>Assumes the seven new kraft combustion units will be required to submit notifications of initial performance test each year over the year.

<sup>g</sup>Assumes one week (40 hours) to develop a record system for recording parameter monitoring information.

<sup>h</sup>Assumes one person would take two weeks (80 hours) to draft the startup, shutdown, and malfunction plan and then another 20 hours of review/revisions, for a total of 100 hours.

<sup>i</sup>Assumes four existing kraft and soda pulp mills will install new recovery furnaces each. Based on current industry trends, these new furnaces are expected to be nondirect contact evaporator (NDCE) recovery furnaces equipped with a dry electrostatic precipitator (ESP) system.

<sup>j</sup>Assumes one week (40 hours) to train personnel.

<sup>k</sup>The one-time burden and cost are equal to the totals added down each column.



TABLE 1b. Recurrent Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Burden item <sup>a</sup>  | (A)<br>Person-hours per occurrence | (B)<br>Number of occurrences per year | (C)<br>Person-hours per respondent per year (C=AxB) | (D)<br>Respondents per year | (E)<br>Technical person-hours per year (E=CxD) | (F)<br>Management person-hours per year (F=Ex0.05) | (G)<br>Clerical person-hours per year (G=Ex0.1) | (H)<br>Respondent person-hours per year (H=E+F+G) | (I)<br>Cost, \$ <sup>b</sup> |
|---|------------------------------------|---------------------------------------|---|-----------------------------|--|--|---|---|------------------------------|
| B. Plan activities  | included in 4E                     |                                       |   |                             |  |  |   |   |                              |
| C. Implement activities   | included in 4E                     |                                       |   |                             |  |  |   |   |                              |
| D. Develop record system  | included in 4E                     |                                       |   |                             |  |  |   |   |                              |
| E. Time to enter information  |                                    |                                       |   |                             |  |  |   |   |                              |
| \$Records of startup, shutdown, and malfunction   | 1.5                                | 52                                    | 78  | 130 <sup>d</sup>            | 10,140   | 507.0  | 1,014.0   | 11,661.0  | 596,896                      |
| \$Records of black liquor solids firing rates for recovery furnaces and semichemical combustion units | 1.5                                | 52                                    | 78  | 130 <sup>d</sup>            | 10,140   | 507.0  | 1,014.0   | 11,661.0  | 596,896                      |
| \$Records of lime production rates for lime kilns   | 1.5                                | 52                                    | 78  | 108 <sup>d</sup>            | 8,424  | 421.2  | 842.4   | 9687.6  | 495,883                      |
| \$Records of CMS data   |                                    |                                       |   |                             |  |  |   |   |                              |
| Record continuously monitored parameters (per shift)  | 0.5                                | 1,050                                 | 525   | 130 <sup>d</sup>            | 68,250   | 3,412.5  | 6,825   | 78,487.5  | 4,017,570                    |
| Compile monthly data  | 16                                 | 12                                    | 192   | 130 <sup>d</sup>            | 24,960   | 1,248  | 2,496   | 28,704  | 1,469,283                    |
| Enter/verify information for quarterly/semiannual reports   | 8                                  | 2                                     | 16  | 130 <sup>d</sup>            | 2,080  | 104  | 208.0   | 2,392.0   | 122,440                      |
| F. Time to train personnel  | N/A <sup>g</sup>                   |                                       |   |                             |  |  |   |   |                              |
| G. Time for refresher training for personnel  | 16 <sup>g</sup>                    | 1                                     | 16  | 130 <sup>d</sup>            | 2,080  | 104  | 208.0   | 2,392.0   | 122,440                      |
| <b>RECURRENT BURDEN AND COST (SALARY) NATIONWIDE:<sup>h</sup></b>                                     |                                    |                                       |   |                             | <b>128,490</b>                                 | <b>6,425</b>                                       | <b>12,849</b>                                   | <b>147,764</b>                                    | <b>\$7,563,627</b>           |

TABLE 1b. Recurrent Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulphite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

Footnotes

<sup>a</sup>See Section 4(b)(ii) for a further explanation of respondent activities.

<sup>b</sup>Costs assume a rate of \$64.60/hour for technical labor, \$95.32/hour for management labor, and \$40.09/hour for clerical labor.

<sup>c</sup>Assumes 16 person-hours per report per affected facility per pollutant for an exceedances report.

<sup>d</sup>Assumes 130 existing mills subject to the MACT, all 108 existing kraft pulp mills have lime kilns.

<sup>e</sup>Assumes five percent of respondents ( $0.05 * 130 = 7$ ) report monitoring exceedances and 95 percent of respondents ( $0.95 * 130 = 123$ ) report no exceedances.

<sup>f</sup>Assumes eight person-hours per report per affected facility per pollutant for a report of no exceedances.

<sup>g</sup>Assumes two days (16 hours) to provide refresher training for personnel. Initial time to train personnel included in Table 1a.

<sup>h</sup>The recurrent burden and cost are equal to the totals added down each column.

TABLE 2. Annual Agency Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Activity   | (A)<br>EPA-<br>hours<br>per<br>operatio<br>n | (B)<br>Number<br>of<br>operatio<br>ns per<br>year | (C)<br>EPA-<br>hours<br>per<br>facility<br>per<br>year<br>(C=AxB) | (D)<br>Facilitie<br>s<br>per<br>year | (E)<br>Technic<br>al<br>person-<br>hours<br>per year<br>(E=CxD) | (F)<br>Managem<br>ent person-<br>hours per<br>year<br>(F=Ex0.05) | (G)<br>Clerical<br>person-<br>hours<br>per year<br>(G=Ex0.<br>1) | (H)<br>Total<br>person-<br>hours per<br>year<br>(H=E+F+<br>G) | (I)<br>Cost,<br>\$ <sup>a</sup> |
|--|--|---|---|--------------------------------------|---|--|--|---|---------------------------------|
| 1. Attend initial performance test                                       | 40   | 1   | 40  | 1 <sup>b</sup>                       | 40  | 2.0  | 4.0  | 46  | 2,355                           |
| 2. Excess emissions—enforcement activities                               | 48   | 1   | 48  | 1 <sup>d,e</sup>                     | 48  | 2.4  | 4.8  | 55.2  | 2,826                           |
| 3. Report review   |  |   |   |                                      |   |  |  |   |                                 |
| \$Review of notification of construction/reconstruction                  | 2  | 1   | 2   | 7 <sup>b</sup>                       | 14  | 0.7  | 1.4  | 16.1  | 824                             |
| \$Review of notification of actual startup                               | 2  | 1   | 2   | 7 <sup>b</sup>                       | 14  | 0.7  | 1.4  | 16.1  | 824                             |
| \$Review of notification of applicability                                | 2  | 1   | 2   | 7 <sup>b</sup>                       | 14  | 0.7  | 1.4  | 16.1  | 824                             |
| \$Review of notification of initial performance test                     | 2  | 1   | 2   | 7 <sup>b</sup>                       | 14  | 0.7  | 1.4  | 16.1  | 824                             |
| \$Review of notification of performance evaluation                       | 2  | 1   | 2   | 7 <sup>b</sup>                       | 14  | 0.7  | 1.4  | 16.1  | 824                             |
| \$Review of notification of compliance status                            | 4  | 1   | 4   | 7 <sup>b</sup>                       | 28  | 1.4  | 2.8  | 32.2  | 1,648                           |
| \$Review of excess emissions report                                      |  |   |   |                                      |   |  |  |   |                                 |
| Quarterly reports of monitoring exceedances and periods of noncompliance | 8  | 4   | 32  | 7 <sup>d,f</sup>                     | 224   | 11.2   | 22.4   | 257.6   | 13,186                          |

TABLE 2. Annual Agency Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

| Activity                                 | (A)<br>EPA-<br>hours<br>per<br>operatio<br>n | (B)<br>Number<br>of<br>operatio<br>ns per<br>year | (C)<br>EPA-<br>hours<br>per<br>facility<br>per<br>year<br>(C=AxB) | (D)<br>Facilitie<br>s<br>per<br>year | (E)<br>Technic<br>al<br>person-<br>hours<br>per year<br>(E=CxD) | (F)<br>Managem<br>ent person-<br>hours per<br>year<br>(F=Ex0.05) | (G)<br>Clerical<br>person-<br>hours<br>per year<br>(G=Ex0.<br>1) | (H)<br>Total<br>person-<br>hours per<br>year<br>(H=E+F+<br>G) | (I)<br>Cost,<br>\$ <sup>a</sup> |
|--|--|---|---|--------------------------------------|---|--|--|---|---------------------------------|
| Semiannual reports of no exceedances     | 2  | 2   | 4   | 123 <sup>d,f</sup>                   | 492   | 24.6   | 49.2   | 565.8   | 28,962                          |
| <b>TOTAL BURDEN AND COST<sup>g</sup></b> |  |   |   |                                      | 902   | 45   | 90   | 1,037   | 53,097                          |

TABLE 2. Annual Agency Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM)

Footnotes

<sup>a</sup>Costs assume a rate of \$40.56/hour for technical labor, \$54.66/hour for management labor, and \$21.95/hour for clerical labor.

<sup>b</sup>Assumes four existing kraft pulp mills will each install one new recovery furnace and SDT and three existing kraft pulp mills will each install one new lime kiln each year. Seven mills will be required to conduct an initial performance test. Assumes EPA personnel attend eight percent of the tests ( $0.08 * 11$  tests = 1 test attended).<sup>c</sup>Of the five percent that are assumed to fail the initial performance test, assume all repeat the performance test ( $0.05 * 11$  combustion units = 1 retest).

<sup>d</sup>Assumes 130 existing mills subject to the MACT.

<sup>e</sup>Assumes five percent of mills are required to retest as a result of excess emissions, and that EPA personnel attend 10 percent of these tests ( $0.05 * 130 * 0.1 = 1$  retest attended).

<sup>f</sup>Assumes five percent of respondents ( $0.05 * 130 = 7$ ) report monitoring exceedances and 95 percent of respondents ( $0.95 * 22 = 21$ ) report no exceedances..

<sup>g</sup>The burden and cost in the third year are equal to the totals added down each column.