

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), EPA ICR Number 1055.09, OMB Control Number 2060-0021

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS), for the regulations published at 40 CFR part 60, subpart BB were proposed on September 24, 1976, and promulgated on February 23, 1978. Revision to the standards was promulgated on May 20, 1986. These regulations apply to the following facilities at kraft pulp mills: recovery furnaces, smelt dissolving tanks, lime kilns, digester systems, brown stock washer systems, black liquor oxidation systems, multiple effect evaporator systems and condensate stripper systems that were constructed, modified or reconstructed after the date of proposal. In pulp mills where kraft pulping is combined with neutral sulfite semi-chemical pulping, the provisions of this subpart are applicable when any portion of the material charged to an affected facility is produced by the kraft pulping operation. Facilities may be exempt from the total reduced sulfur (TRS) standard if the facility can demonstrate that TRS emissions from a new modified or reconstructed brown stock washer can be neither technically nor economically feasibly controlled. This information is being collected to assure compliance with 40 CFR part 60, subpart BB.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS. A semiannual summary report is also required.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports 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).

We have assumed that an average of 100 sources will be subject to the regulation over the next three years. It is estimated that two additional sources per year will become subject to the regulation.

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

All of the kraft pulp mills in the United States are owned and operated by the kraft pulp mills industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government; all these facilities are privately, owned for-profit businesses. The burden to the “Affected Public” is listed in Table 1: Annual Industry Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), attached. The Federal government burden associated with the review of reports submitted by the respondent is shown in Table 2: Average Annual EPA Burden – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), attached.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

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, TRS emissions from kraft pulp mills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart BB.

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. In addition, the collected information is 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart BB.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 100 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice.

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

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 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 (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements kraft pulp mills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 2611, which correspond to the North American Industry Classification System (NAICS) code 322110 for kraft pulp mills.

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 that is recorded or reported is required by NSPS for Kraft Pulp Mills (40 CFR part 60, subpart BB).

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	60.7(a)(1), 60.15
Notification of actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Initial performance test results	60.8(a)
Demonstration of continuous system performance	60.7(a)(5)
Physical or operational changes	60.7(a)(4)
Opacity or visible emissions observations	60.7(a)(6)
Semiannual report	60.7(c), 60.284(d)
Excess emissions report	60.7(c), 60.284(d)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, or malfunction period where the continuous monitoring system is inoperative	60.7(b)
Record continuous monitoring system parameter data	60.284(a)-(c)
Maintain and retain files for at least two years	60.7(f)

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 not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a continuous monitoring system (CMS) to monitor and record opacity of gases discharged from any recovery furnace: the concentration of TRS emissions on a dry basis and the percent of oxygen by volume in the gases discharged from any lime kiln, recovery furnace, digester system, brown stock washer system, multi-effect evaporator system or condensate stripper system; the combustion temperature at the point of incineration of effluent gases which are emitted from a digester system; the scrubbing liquid supply pressure and pressure loss of the gas stream to the scrubber emission control device that is discharges from any lime kiln or smelt dissolving tank.
Perform initial performance test, Reference Method 5, 17, 3B, 9, 16, 16A, 16B, and repeat performance test 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.
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.

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 OTIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. 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 the EPA Office of Compliance. OTIS is the EPA 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 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 two 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 NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), below.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. 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 15,235 (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 NSPS 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	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject standard are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs, such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous 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)
Opacity monitor	\$40,000	2	\$80,000	\$8,600	100	\$860,000
TRS monitor	\$108,000	2	\$216,000	\$23,000	100	\$2,300,000
Incinerator temperature monitor	\$8,600	2	\$17,200	\$4,600	100	\$460,000
Scrubber liquid supply pressure monitor	\$350	2	\$700	\$0	0	\$0
Scrubber liquid flow rate monitor	\$15,500	2	\$31,000	\$0	0	\$0
Total cost			\$344,900			\$3,620,000

The total capital/startup costs for this ICR are \$344,900. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs including photocopying, and postage are \$3,620,000. 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 \$3,964,900.

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 \$41,308.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 + 60%)
Technical	\$41.57	(GS-12, Step 1, \$25.98 + 60%)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 + 60%)

These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), 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 100 existing respondents will be subject to the standard. It is estimated that two additional respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 100 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	2	96	0	0	98
2	2	98	0	0	100
3	2	100	0	0	102
Average	2	98	0	0	100

¹ 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 100.

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	2	1	0	2
Notification of actual startup	2	1	0	2
Notification of performance test	2	1.2	0	2.4
Notification of CMS demonstration	2	1	0	2
Notification of physical or operational changes	2	1	0	2
Notification of opacity or visible emission Observations	2	1	0	2
Report of performance test	2	1.2	0	2.4
Semiannual report	100	2	0	200
Excess emissions report	100	2	0	200
			Total	414.8

The number of Total Annual Responses is 415 (rounded).

The total annual labor costs are \$1,229,899. Details regarding these estimates may be found in Table 1: Annual Respondents Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), 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 hours are 15,235. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB). (Below.) Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$3,964,900. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over the next three years is estimated to be 1,019 labor hours at a cost of \$41,308. See Table 2. Annual Agency Burden and Cost: NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), below.

6(f) Reasons for Change in Burden

There is no change in the labor 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 very low, negative or non-existent, so there is no significant change in the overall burden. It should be noted that there is a small adjustment to the burden cost figure because rounded figures were used in the previous ICR. In this ICR exact figures are used.

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 37 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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-2008-0293. 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-2008-0293 and OMB Control Number 2060-0021 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	2	2	0.1	0.2	\$186.00
B. Required activities								
Initial performance tests ^c	374	1	374	2	748	37.4	74.8	\$69,443
Repeat performance tests ^d	370	0.2	74	2	148	7.4	14.8	\$13,740
C. Gather existing information	See 3B							
D. Write report								
Notification of construction/reconstruction	2	1	2	2	4	0.2	0.4	\$371
Notification of performance test	2	1.2	2.4	2	4.8	0.2	0.5	\$446
Notification of actual startup	2	1	2	2	4	0.2	0.4	\$371
Notification of CMS demonstration	2	1	2	2	4	0.2	0.4	\$371
Notification of physical changes	2	1	2	2	4	0.2	0.4	\$371
Notification of opacity or visible emissions Observations	2	1	2	2	4	0.2	0.4	\$371
Report of performance test	See 3B							
Semiannual report ^e	8	2	16	100	1,600	80	160	\$148,541
Excess emissions report ^f	8	2	16	100	1,600	80	160	\$148,541
Subtotal for Reporting Requirements					4,741.2			
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information								
Records of operating parameter ^g	0.25	365	91.25	100	9,125	456	913	\$847,147
Subtotal for Recordkeeping Requirements					10,494			

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) Total Cost Per year ^b
					13,247.8	662.1	1,325.3	\$1,229,899
TOTAL LABOR BURDEN AND COST (rounded)						15,235.2 (rounded) 15,235		\$1,229,899

Assumptions:

^a We have assumed an average of 100 respondents over the next three years.

^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2005 "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.

^c We have assumed that it will take 374 hours for each new respondent to perform the initial performance test.

^d We have assumed that 20 percent of respondents would repeat performance test due to failure.

^e We have assumed that all respondents will each take eight hours to complete the semi annual report.

^f We have assumed that each respondent will take eight hour to two times per year to complete the excess emissions report.

^g We have assumed that it will take each respondent 15 minutes per day to record operating parameter.

Table 2: Average Annual EPA Burden - NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal)

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
Initial performance tests ^c								
New plant	24	1	24	2	48	2.4	4.8	\$2,238
Repeat performance test ^d								
New plant	24	0.2	4.8	2	9.6	0.48	0.96	\$448
Report Review								
New plant								
Notification of construction	2	1	2	2	4	0.2	0.4	\$186
Notification of performance test	0.5	1.2	0.6	2	1.2	0.06	0.12	\$56
Notification of actual startup	0.5	1	0.5	2	1	0.05	0.1	\$47
Notification of CMS demonstration	0.5	1	0.5	2	1	0.05	0.1	\$47
Notification of physical/operational changes	0.5	1	0.5	2	1	0.05	0.1	\$47
Notification of opacity or visible emissions observations	0.5	1	0.5	2	1	0.05	0.1	\$47
Review test results	8	1.2	9.6	2	19.2	0.96	1.92	\$895
Existing plants								
Semiannual reports ^e	4	2	8	100	800	40	80	\$37,297
Subtotals Labor Burden and cost					886	44.3	88.6	\$41,308.21
TOTAL ANNUAL BURDEN AND COST (rounded)						1,018.9 1,019 (rounded)		\$41,308

Assumptions:

^a We have assumed an average of 100 respondents over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$56.02 for Managerial (GS-13, Step 5, \$35.01 x 1.6), \$41.57 for Technical (GS-12, Step 1, \$25.98 x 1.6) and \$22.50 Clerical (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

^c We have assumed that it will take twenty-four hours for each new respondent to perform the initial performance test.

^d We have assumed that 20 percent of respondents would repeat performance test due to failure.

^e We have assumed that each respondent will take four hours to review the semiannual report.