

**Supporting Statement for a Request for OMB Review under  
the Paperwork Reduction Act**

**PART A**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

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

**Title: Pressed Wood Manufacturing Industry Survey**

**EPA ICR No. 2328.01            OMB Control No.    2070-TBD**

**1(b) Short Characterization**

EPA's Office of Pollution Prevention and Toxics (OPPT) has initiated a proceeding to investigate whether and what type of regulatory or other action might be appropriate to control the levels of formaldehyde emitted from pressed wood products. As part of this investigation, EPA seeks to survey U.S. pressed wood manufacturers to collect information on the categories and volume of pressed wood manufactured; the types of resins used in the manufacturing process; the formaldehyde emissions levels from the pressed wood; recent or planned changes to reduce formaldehyde emissions and the resulting costs; and any issues that may affect the ability to reduce formaldehyde emissions. The survey will be sent to all U.S. pressed wood manufacturers identified by EPA (i.e., it will be a census).

Many pressed wood manufacturers are expected to modify their production processes in the coming years in response to factors including the growing demand for green building products, implementation of a California Air Resources Board (CARB) rule to control formaldehyde emissions, and European and Japanese formaldehyde standards. The information collected through the survey will allow OPPT to predict a future baseline for the types of resins that will be used in pressed wood, and the levels of formaldehyde that will be emitted from them. OPPT will also use this information to assess the incremental benefits and costs of potential actions at the national level to address formaldehyde emissions from pressed wood products. This information is necessary to inform Agency decisionmaking about the need for and scope of regulatory or other actions to control the levels of formaldehyde emitted from pressed wood products. If this survey is not conducted, EPA will not have this data to establish the baseline for its potential actions nor insight into the adjustments that plants in the industry are planning to make. Therefore, this survey is necessary for the proper performance of Agency functions.

The survey consists of different questionnaires for different types of pressed wood manufacturers. One questionnaire is for manufacturers of hardwood plywood, particleboard, and medium density fiberboard (which are the products subject to the CARB rule). The questionnaire collects data on whether the firm intends to become certified under the CARB rule, the production and process issues that the firm has addressed to become CARB certified, and the costs that were incurred. It also asks for similar

information about the production and process issues that would need to be addressed (and the costs that would be incurred) in the future to comply with various standards within the CARB rule.

The second questionnaire is for manufacturers of hardboard or structural composites (glued laminated timber, I-joists, oriented strandboard, softwood plywood, and structural composite lumber). These products are not subject to the CARB rule. Although some of these products are subject to European or Japanese formaldehyde standards, these manufacturers may not have invested as much effort into investigating how they could lower formaldehyde emissions from their products and what the impacts of the changes would be. The questionnaire is designed to be completed with information that should be readily available to a knowledgeable plant representative. These manufacturers are unlikely to have as much readily available information to use responding to the survey. Accordingly, the questionnaire for hardboard and structural composite manufacturers asks for a more limited set of information.

EPA estimates that there will be roughly 343 survey respondents, and that they will incur a total burden of 5,804 hours at an estimated cost of \$324,220 as a result of this one-time collection. The cost to the Agency is estimated to be approximately \$120,000.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

Pressed wood products (also known as composite wood products or composite panel products) are engineered wood products made from wood veneers, particles, or wood fibers bonded together with an adhesive under heat and pressure. Pressed wood includes glued laminated timber, hardboard, medium density fiberboard, oriented strandboard, particleboard, hardwood and softwood plywood, prefabricated I-joists, and structural composite lumber (which includes laminated veneer lumber, laminated strand lumber, parallel strand lumber, and oriented strand lumber). Resins serve to bind together raw wood materials, such as wood shavings, flakes, wafers, chips, particles, veneers, fibers, strands, or sawdust, to form the pressed wood product. There are several types of formaldehyde-based resins that are used, as well as alternative resins that are not formaldehyde-based. Formaldehyde emissions are a concern because formaldehyde is both an irritant and a probable human carcinogen.

In 2008, the California Air Resource Board (CARB) adopted an Airborne Toxics Control Measure (ATCM) that set standards for formaldehyde emissions from particleboard, medium density fiberboard, and hardwood plywood sold, offered for sale, supplied, or manufactured for use in California. The CARB ATCM also requires that compliant products be used in finished goods sold, offered for sale, supplied or manufactured for sale in California. The CARB ATCM will be phased in between 2009 and 2012.

In March 2008, EPA was petitioned under section 21 of the Toxic Substances Control Act (TSCA) to use section 6 of TSCA to adopt the CARB ATCM. The petitioners asked EPA to exercise its authority under TSCA section 6 to adopt and apply nationally the CARB formaldehyde emissions regulation for these wood products. Although a substantial amount of information was submitted by reference with the petition or otherwise available to the Agency, EPA determined that the available information was not sufficient to support an evaluation of whether formaldehyde emitted from hardwood plywood, particleboard, and medium density fiberboard presents or will present an unreasonable risk to human health (including cancer and non-cancer endpoints) under TSCA section 6. As discussed in detail

in the June 27, 2008 Federal Register notice announcing EPA's response to the petition (73 FR 36504), EPA's evaluation of the data provided by the petitioners revealed significant information gaps that would need to be filled to support an evaluation of whether use of formaldehyde in these products presents or will present an unreasonable risk under TSCA section 6.

EPA decided to respond to the petition by initiating a proceeding to investigate whether and what type of regulatory or other action might be appropriate to protect against risks posed by formaldehyde emitted from the products covered by the CARB ATCM as well as other pressed wood products. At the conclusion of this investigation, EPA anticipates determining whether EPA should take action, which may include regulatory action under TSCA § 6(a), action under TSCA § 6(b), voluntary or regulatory (e.g., under TSCA § 6) application of a voluntary consensus standard, or other approaches.

Also in the June 2008 response to the petition, EPA indicated that it planned to conduct an industry survey to inform EPA's decisionmaking about formaldehyde emissions from pressed wood. This information collection request seeks approval for that survey.

As part of its investigation into formaldehyde and pressed wood, EPA seeks to obtain a better understanding of the current and future levels of formaldehyde emissions from pressed wood; available technologies to control formaldehyde emissions from pressed wood; the pressed wood manufacturing industry's response to the CARB ATCM, European and Japanese standards, and the growing consumer demand for green building products; and the costs to reduce formaldehyde emissions from pressed wood products. In order to gather this information, EPA plans to survey all pressed wood manufacturers in the U.S.

The information will be collected with two questionnaires. The Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire will be used for manufacturers that produce products regulated by the CARB ATCM. The Hardboard and Structural Composite Manufacturers questionnaire will be used for manufacturers that produce pressed wood products that are not subject to the CARB ATCM. Although some of their products may be subject to European or Japanese formaldehyde standards, EPA recognizes that manufacturers making products not subject to the CARB ATCM may not have invested as much effort into investigating how they could lower formaldehyde emissions from their products, and thus may not have as much readily available information to use responding to the survey. Accordingly, the Hardboard and Structural Composite Manufacturers Questionnaire asks for a much more limited set of information than the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire.

The Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire has eight sections: (1) General Manufacturer Identification Information, (2) Primary Products Manufactured, (3) Changes to Achieve CARB Phase 1 Certification, (4) Changes to Achieve CARB Phase 2 Certification, (5) Planned Changes to Achieve CARB Phase 2 Certification, (6) Issues That May Affect Ability to Reduce Formaldehyde Emissions for Respondents Who Do Not Intend to Become CARB Phase 2 Certified, (7) Issues that may Affect Ability to Use a No-Added Formaldehyde (NAF) Resin, and (8) Secondary Products Manufactured. This information will allow EPA to consider a broad range of potential options to control formaldehyde emissions (from those analogous to CARB Phase 1 to those that could be achieved with NAF resins) if the Agency determines that controls are needed.

The Hardboard and Structural Composite Manufacturers Questionnaire has four sections: (1) General Manufacturer Identification Information, (2) Primary Products Manufactured, (3) Recent or

Planned Changes Resulting in Lower Formaldehyde Emissions, and (4) Issues That May Affect Ability to Reduce Formaldehyde Emissions or Switch to a No-Added Formaldehyde (NAF) Resin. This information will allow EPA to consider whether any action is needed for these product categories, and what the consequences of such actions might be.

The survey will provide information that EPA can use to project a baseline scenario for the levels of formaldehyde emitted by pressed wood in the absence of any actions by EPA. (The baseline information will be used to determine whether there is a need for additional federal action, and the potential benefits and costs of any such action.) Manufacturers may adopt different strategies in response to changes in the market. For example, some manufacturers may choose to make all of their products, including products sold outside of California, compliant with the CARB ATCM emissions standards. Other manufacturers may decide to specialize in products for sale outside of California. Yet other manufacturers may produce two types of products, one for sale in California and another for sale in the rest of the country. Similarly, manufacturers of pressed wood products not covered by the CARB ATCM may also have taken steps or be planning to reduce formaldehyde emissions from their products in response to concerns about formaldehyde emissions, the growing demand for green building products, and European and Japanese formaldehyde standards for pressed wood products. The survey will indicate which strategies manufacturers intend to pursue.

The survey will provide information for EPA to calculate the costs and potential impacts of various possible strategies to control formaldehyde emissions. EPA also plans to use the baseline information, in conjunction with ongoing efforts to investigate the exposure and hazards of formaldehyde, to consider the need for and the potential benefits of controls on formaldehyde emissions.

EPA has determined that a census is needed for the survey instead of a sample. Within the pressed wood industry, manufacturers produce a variety of pressed wood products using different resins, equipment, and processes. A sample may not adequately capture the variations in products, resins, equipment, processes, scale of operations, current and future levels of formaldehyde emissions, and costs to reduce formaldehyde emissions.

EPA is not planning to include companies that do not manufacture pressed wood in this survey. Specifically, this survey effort does not include U.S. companies that only import pressed wood or finished goods made from pressed wood. In part, this is due to the large numbers of importers and the practical difficulties in identifying and surveying them. It is also because the technological changes to reduce formaldehyde emissions will often be incurred by foreign manufacturers and may only manifest themselves to importers as increases in the cost of the goods being imported. EPA believes that it can use the information from the survey of domestic manufacturers, supplemented by other sources (such as conversations with less than ten trade associations, importers, wholesalers, or retailers), to predict the baseline for imported products and potential changes in costs for imports due to potential actions to control formaldehyde emissions.

EPA will use the survey results to predict a future baseline for the types of resins that will be used in pressed wood, and the levels of formaldehyde that will be emitted from them. The survey data will also be used to develop an industry profile, and to assess the costs and benefits of potential federal actions regarding formaldehyde emissions from pressed wood products. This information is necessary to inform Agency decisionmaking about whether and what type of regulatory or other actions might be appropriate to control the levels of formaldehyde emitted from pressed wood products.

EPA is considering whether it may be appropriate to use TSCA § 6(a), 15 U.S.C. 2605(a), or TSCA § 6(b), 15 U.S.C. 2605(b), to protect against risks posed by formaldehyde emitted from pressed wood products. TSCA § 6(a) provides EPA with the authority to regulate the manufacture, processing, distribution in commerce, use, or disposal of chemical substances or mixtures, if such activities present or will present an unreasonable risk of injury to human health or the environment. TSCA § 6(b) provides EPA with the authority to regulate the quality control measures used by manufacturers and processors of chemical substances or mixtures. As part of its investigation, EPA will also consider whether voluntary action might be appropriate to address formaldehyde emissions from pressed wood products.

EPA will request that all U.S. pressed wood manufacturers voluntarily complete the survey. If EPA does not achieve a sufficient survey response rate to accurately characterize the industry, EPA will consider whether to exercise the authority available to it under TSCA § 11(c), 15 U.S.C. 2610(c). TSCA § 11(c) provides EPA with the authority to issue subpoenas requiring the production of reports, papers, documents, answers to questions, and other information that the Administrator deems necessary. EPA could potentially use its TSCA § 11(c) authority to issue subpoenas requiring recipients (i.e., non-respondents) to complete and return the survey.

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

EPA will use the data collected through this one-time survey as part of its investigation of whether and what type of regulatory or other action might be appropriate to protect against risks posed by formaldehyde emitted from pressed wood products. The survey will provide the Agency with plant-level data on processes and production, and will indicate how manufacturers plan to respond to the CARB ATCM, European and Japanese formaldehyde standards, and increased demand for pressed wood products with low formaldehyde emissions. The data obtained through this survey will be used to project baseline levels of formaldehyde emission from pressed wood. This will inform Agency decision making regarding the potential need for and possible scope of federal actions to control the levels of formaldehyde emitted from pressed wood products. This data will also inform the Agency's projections regarding the likely responses of pressed wood manufacturers to any further voluntary or mandatory requirements at the national level regarding formaldehyde emissions from pressed wood. The survey data will also be used to understand the use of low-emitting or no-added formaldehyde adhesives that are increasingly being used in the pressed wood industry. And the survey data will allow EPA to better estimate the incremental industry costs and small entity impacts of adopting a national formaldehyde emissions standard. Should EPA decide to proceed under TSCA, EPA will use the data in analyses to meet its responsibilities under TSCA and other statutes and executive orders, such as the Regulatory Flexibility Act and Executive Order 12866.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Nonduplication**

To the best of EPA's knowledge, the data to be collected through this survey is not available elsewhere. EPA has investigated various sources of data on the pressed wood industry, including other surveys, trade association literature, academic studies, and government reports. In general, other sources of information on the pressed wood industry are historical and do not address recent changes in state or international regulation; do not contain the information that EPA needs to predict a future baseline; are based on judgments rather than a comprehensive and rigorous collection of information from

manufacturers; or lack the specificity and level of detail that EPA is requesting in this survey in order to estimate the industry baseline and the costs and benefits of potential future actions at the federal level. Two other surveys of the pressed wood industry, one by EPA and the other by the state of California, are described below. Neither duplicates the information to be collected through this survey.

In 1998, EPA surveyed pressed wood manufacturing facilities to gather information to develop a National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Plywood and Composite Wood Products (PCWP) industry. The current survey does not duplicate the PCWP survey. The current survey focuses on the level of formaldehyde emissions from pressed wood boards, while the PCWP survey was focused on plant emissions (e.g., stack and fugitive sources). Furthermore, in response to changes in market conditions and regulatory requirements (such as the CARB ATCM, which phases in between 2009 and 2012), EPA expects that many pressed wood manufacturing plants have changed their operations (including production volumes, resins, equipment, and processes) since 1998, or plan to make changes in the future. To the extent that some of the questions in this survey are similar to those in the PCWP survey, many of the answers that plants will provide may have changed in the intervening decade. Because the current survey will collect different and updated information as compared to the PCWP survey, the data collected in 1998 does not fulfill EPA's current needs, and the current survey is not duplicative of the PCWP survey.

In 2002, CARB conducted a survey of particleboard, medium density fiberboard, and hardwood plywood manufacturers. However, CARB's survey was more limited than this survey in terms of the types of facilities surveyed and the types of information collected. Furthermore, the CARB survey was intended to characterize the state of the market for these three products *prior* to 2002. Many manufacturers of these three pressed wood products will be making significant changes to their products and production processes in response to the CARB ATCM, which phases in between 2009 and 2012. EPA is trying to characterize the baseline for the market *after* the CARB ATCM goes into effect, and to determine the costs for potential *future* actions to control formaldehyde emissions. The information collected through the 2002 CARB survey does not address these issues. Therefore, the current survey is not duplicative of the CARB 2002 survey.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

Pursuant to the Paperwork Reduction Act (44 U.S.C. 3501 *et seq.*), the Environmental Protection Agency notified the public through a *Federal Register* notice (see 73 FR 79083, December 24, 2008) of the Agency's intent to submit the Pressed Wood Manufacturing Industry Survey ICR to OMB. (A subsequent notice, 74 FR 7889, extended the 60 day comment period an additional 30 days.) At that time, the data collection consisted of a single survey instrument, intended for manufacturers of all types of pressed wood products. The notice included a description of the entities to be affected by the proposed survey, a brief explanation of the need for the survey, identification of the statutory authority under which the survey will be issued, and an estimate of burden to be incurred by survey respondents. Through the notice, the Agency requested comments and suggestions regarding the survey and the reduction of data collection burden. A summary of the comments EPA received and EPA's responses are included in Appendix C.

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

Under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an original or renewal ICR to OMB for

review and approval. EPA sent requests for comments on the ICR to 9 industry representatives. These consultations are detailed in Appendix B.

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

This survey is to be administered one time only. If this survey is not conducted, the specific data sought in this survey will not be available for EPA’s use in decisionmaking about the need for and scope of potential actions to protect against risks posed by formaldehyde emitted from pressed wood products.

**3(e) General Guidelines**

This information collection complies with the guidelines in 5 CFR 1320.5(d)(2).

**3(f) Confidentiality**

EPA is not collecting information of a sensitive or private nature. However, respondents may designate information submitted on the survey as Confidential Business Information (CBI) under section 14 of TSCA. In general, voluntarily submitted information is entitled to confidential protection where the information would not customarily be disclosed to the public, although authorities in TSCA Section 14 may apply. EPA will disclose information that is covered by a claim of confidentiality only to the extent permitted by, and in accordance with, the procedures in TSCA section 14 and the regulation at 40 CFR part 2, which provides advance notice and an opportunity to object prior to public disclosure.

EPA takes stringent measures to protect CBI submitted in connection with TSCA pursuant to 40 CFR part 2 and the “TSCA CBI Protection Manual”. These procedures include security clearance and training for all staff permitted to access TSCA CBI, storage of TSCA CBI in secured areas, computer security for TSCA CBI, secure methods for creating, transferring, and destroying TSCA CBI, and advance notice of disclosure to contractors (usually via the Federal Register) where such disclosure is authorized.

In accordance with 40 CFR part 2, the survey instruments inform respondents of their right to claim information as confidential. The survey provides instructions for claiming confidentiality, and informs respondents of the terms and rules governing the protection of CBI under TSCA and 40 CFR part 2. Each survey question which requests potentially confidential information is accompanied by a CBI check box. Survey respondents are instructed to check the boxes for all responses they claim as CBI.

**3(g) Sensitive Questions**

Not applicable. The information requested is not sensitive in nature.

**4(a) Respondents NAICS Codes**

Respondents associated with this information collection are facilities engaged in the manufacturing of pressed wood products. The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by this information collection are:

- 321211 Hardwood Veneer and Plywood Manufacturing
- 321212 Softwood Veneer and Plywood Manufacturing
- 321213 Engineered Wood Member (Except Truss) Manufacturing

Facilities with other primary NAICS codes may also be affected if they engage in pressed wood manufacturing as a secondary activity. EPA projects a total of 343 responses under this ICR.

#### **4(b) Information Requested**

##### ***4(b)(i) Data Items***

This section lists the data items requested and provides justification for requesting the information. There are three information collection activities: information collected through telephone calls to identify a technical contact to receive the survey; information collected on the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire; and information collected on the Hardboard and Structural Composite Manufacturers Questionnaire.

#### **TECHNICAL CONTACT IDENTIFICATION TELEPHONE CALLS**

All pressed wood manufacturers identified by EPA will initially be contacted by telephone to identify a knowledgeable person who can complete the survey, and obtain this person's title, telephone number and address. This person will be asked for their preferred format for the survey (electronic or paper).

#### **HARDWOOD PLYWOOD, MEDIUM DENSITY FIBERBOARD, AND PARTICLEBOARD MANUFACTURERS QUESTIONNAIRE**

This questionnaire will be completed by hardwood plywood, medium density fiberboard, and particleboard manufacturers. The questionnaire is designed to be completed with information that should be readily available to a knowledgeable plant representative. Questions fall into eight categories: (1) General Manufacturer Identification Information, (2) Primary Products Manufactured, (3) Changes to Achieve CARB Phase 1 Certification, (4) Changes to Achieve CARB Phase 2 Certification, (5) Planned Changes to Achieve CARB Phase 2 Certification, (6) Issues That May Affect Ability to Reduce Formaldehyde Emissions for Respondents Who Do Not Intend to Become CARB Phase 2 Certified, (7) Issues That May Affect Ability to Use a No-Added Formaldehyde (NAF) Resin, and (8) Secondary Products Manufactured. The questions are described in more detail below.

##### *General Manufacturer Identification Information (Section I)*

Questions 1 through 5 request verification of name and address information for the plant and its legal owner. EPA will pre-fill this information on the questionnaire form based on publicly available information, and will ask the respondent to review the information and to make any necessary corrections. EPA will use this verification to ensure that its plant list is current and accurate, a necessary component of developing a profile of entities that might be subject to a potential action under Section 6 of TSCA.

Question 6 requests verification of the name, title, telephone number, and e-mail address of the contact person at the plant. EPA will pre-fill this information on the questionnaire form, based on the response from the technical contact identification telephone call, and ask the respondent to review the accuracy of the information and to make any necessary corrections. With this information, EPA will contact a responsible individual at the plant to obtain clarification of various survey responses if necessary.



Questions 7 and 8 ask about the size and gross revenue of the ultimate parent company and the plant, respectively. EPA will pre-fill these sections of the questionnaire form based on information from sources such as Dun & Bradstreet, and ask the respondent to review the information and make any necessary corrections. EPA will use this information to evaluate potential small entity impacts as the Agency considers whether to initiate a rulemaking.

*Primary Pressed Wood Products Manufactured (Section II)*

Question 9 requests that the respondent complete a table to identify the categories of primary pressed wood products manufactured at the plant. Since product and plant characteristics differ depending on the category of pressed wood produced, and since EPA could consider adopting different approaches for different categories of pressed wood if a rulemaking is initiated, it is important for the Agency to collect information separately for each pressed wood category. The question also asks for the average annual production volume over the last five years as well as the plant's maximum production capacity for each pressed wood category. Because production volumes may vary across years (and may be markedly lower in 2009 compared to previous years, due to the economic downturn), EPA is asking for the average annual production over a five year period rather than just a single year. EPA will use this data to more accurately determine a plant's typical production level. Information about a plant's typical production level is important because it will enable the Agency to more fully assess the scope and impacts of any future regulatory activity. In addition, Question 9 asks for a plant's maximum production capacity because the availability of excess capacity can affect the feasibility and cost of certain options for reducing formaldehyde emissions. These data will be used in conjunction with the information collected in questions 14 and 15 to estimate the aggregate production of pressed wood products by various formaldehyde emission levels and certification standards. This information is important for estimating the benefits and costs of potential actions to control emissions.

Question 10 asks the respondent to identify, by marking checkboxes corresponding to different geographic regions, the geographic locations where its pressed wood products are sold. EPA will use this information to correlate responses with existing formaldehyde emissions standards in these locations, and thereby identify the scope of products that would be affected by any future federal action.

Questions 11, 12, and 13 ask manufacturers of hardwood plywood, medium density fiberboard, and particleboard, respectively, about certain process and product characteristics that are likely to influence the plant's ability to reduce formaldehyde emissions as well as the control technology choice a particular plant would be likely to choose to reduce formaldehyde emissions. The questions are multiple-choice; respondents may choose from answers that represent common industry practices, or write in a different response. EPA will use this information to evaluate the feasibility of emissions reductions for plants with different characteristics, the technologies that they would be likely to adopt to reduce emissions, and the cost of such changes.

Questions 14 and 15 ask the respondent to complete tables on the type(s) of binder or resin technology used at the plant (Question 14), the emission certifications that the products qualify for (Question 14), the formaldehyde levels emitted by the pressed wood products that are manufactured (Question 15), and any recent or planned changes to these product characteristics for each category of pressed wood product manufactured at the plant (Questions 14 and 15). Respondents are asked to provide information for each pressed wood category they manufacture, and as applicable, specific classes of products within each category where classes differ in their binder/resin technology, formaldehyde emission certification standard category, or formaldehyde emissions profile. Question 15 also asks that

the respondents provide, as appropriate, the relative share of the production of each pressed wood category that is represented by each adhesive/emissions class. In conjunction with the information collected in question 9, EPA will use this information to develop a baseline for resin technologies, formaldehyde emission rates, and compliance with various standards (such as those in the CARB ATCM) across pressed wood categories. This information is important for estimating the benefits and costs of potential actions to further control emissions. Information from plants that have made or are planning to make changes to their products will also provide insights into the resin technologies that might be adopted by other plants to achieve any additional reductions in formaldehyde emissions. EPA will use all of this information to inform its determination of whether and what type of action on formaldehyde emissions from pressed wood products may be warranted.

*Changes to Achieve CARB Phase 1 (Section III) and Phase 2 (Section IV) Certification, and Planned Changes to Achieve CARB Phase 2 Certification (Section V)*

Questions 16 through 24 ask the respondent to provide information about past (Questions 16 through 21) and future (Questions 22 through 24) changes to their manufacturing processes in order to achieve CARB Phase 1 and Phase 2 certification. These questions cover both the physical or process changes that were or are anticipated to be implemented, and the costs of these changes. Questions 16, 19, and 22 ask the respondent how they changed or will change their resin system or manufacturing process in order to lower formaldehyde emissions. Questions 17, 20 and 23 ask the respondent what issues were or will be addressed in order to meet the lower formaldehyde emission requirements. Questions 18, 21, and 24 ask for estimates of the costs of past and future changes to the manufacturing processes. Questions are multiple-choice where possible (i.e., a list of standard industry practices or a discrete range of answers exists), or ask for the respondent to write in facility-specific costs or values. Space is provided for respondents to optionally provide other written information to clarify or further explain any of their responses, if desired. EPA will use data from plants that have made or are planning to make changes to their products or processes to determine the changes that might be made by other plants to achieve reductions in formaldehyde emissions.

*Issues That May Affect Ability to Reduce Formaldehyde Emissions for Respondents Who Do Not Intend to Become CARB Phase 2 Certified (Section VI)*

Question 25 asks facilities that do not intend to become CARB Phase 2 certified why they do not intend to seek certification and asks them about the issues they would likely face in order to further lower formaldehyde emissions. These questions mirror those asked in questions 17, 20, and 23, and the response information provided will be used by EPA to estimate the feasibility and cost of reducing formaldehyde emissions from the products made by these facilities based on the data reported by facilities that have or plan to achieve CARB certification. The question asks for the respondent to write in facility-specific information and then choose (via check-boxes) from a list of potential issues that may affect their ability to reduce formaldehyde emissions. Space is provided for respondents to optionally provide other written information to clarify or further explain any of their responses, if desired.

*Issues That May Affect the Ability to Use a No-Added Formaldehyde (NAF) Resin (Section VII)*

Question 26 asks facilities about the issues they would likely face in order to switch to a NAF resin. EPA will use response information from this question to determine the feasibility and cost for facilities that have not already done so to adopt NAF resin technology. The question asks for the respondent to write in facility-specific information and then choose (via check-boxes) from a list of potential issues that may affect their ability to reduce formaldehyde emissions. Space is provided for

respondents to optionally provide other written information to clarify or further explain any of their responses, if desired.

#### *Secondary Products Manufactured (Section VIII)*

Secondary products are manufactured by covering a primary composite panel with a covering such as a high pressure laminate, thermally fused paper, vinyl, foil, film, or coating. These coverings, and the resins used to adhere them, may affect formaldehyde emissions from panel products. Question 27 asks respondents to complete a table to provide information about the secondary products they manufacture, the primary pressed wood products used in that secondary manufacturing process, and the resins used in the secondary manufacturing process. EPA will use this information to determine whether to address formaldehyde emissions from secondary products.

### **HARDBOARD AND STRUCTURAL COMPOSITE MANUFACTURERS QUESTIONNAIRE**

This questionnaire will be completed by manufacturers of hardboard or structural composites (glulam, I-joists, oriented strandboard, softwood plywood, or structural composite lumber, which includes laminated veneer lumber, laminated strand lumber, parallel strand lumber, and oriented strand lumber). The questionnaire is designed to be completed with information that should be readily available to a knowledgeable plant representative. Questions fall into four categories: (1) General Manufacturer Identification Information, (2) Primary Products Manufactured, (3) Recent or Planned Changes Resulting in Lower Formaldehyde Emissions, and (4) Issues That May Affect Ability to Reduce Formaldehyde Emissions or Switch to a No-Added Formaldehyde (NAF) Resin. The questions are described in more detail below.

#### *General Manufacturer Identification Information (Section I)*

Questions 1 through 5 request verification of name and address information for the plant and its legal owner. EPA will pre-fill this information on the questionnaire form based on publicly available information, and will ask the respondent to review the information and to make any necessary corrections. EPA will use this verification to ensure that its plant list is current and accurate, a necessary component of developing a profile of entities that might be subject to a potential action under Section 6 of TSCA.

Question 6 requests verification of the name, title, telephone number, and e-mail address of the contact person at the plant. EPA will pre-fill this information on the questionnaire form, based on the response from the technical contact identification telephone call, and ask the respondent to review the accuracy of the information and make any necessary corrections. With this information, EPA will contact a responsible individual at the plant to obtain clarification of various survey responses if necessary.

Questions 7 and 8 ask about the size and gross revenue of the ultimate parent company and the plant, respectively. EPA will pre-fill these sections of the questionnaire form based on information from sources such as Dun & Bradstreet, and ask the respondent to review the information and make any necessary corrections. EPA will use this information to evaluate potential small entity impacts as the Agency considers whether to initiate a rulemaking.

#### *Primary Pressed Wood Products Manufactured (Section II)*

Question 9 requests that the respondent complete a table to identify the categories of pressed wood products manufactured at the plant. Since product and plant characteristics differ depending on

the category of pressed wood produced, and since EPA could consider adopting different approaches for different categories of pressed wood if a rulemaking is initiated, it is important for the Agency to collect information separately for each pressed wood category. The question also asks for the average annual production volume over the last five years as well as the plant's maximum production capacity for each product category. Because production volumes may vary across years (and may be markedly lower in 2009 compared to previous years due to the economic downturn), EPA is asking for the average annual production over a five year period rather than just a single year. EPA will use this data to more accurately determine a plant's typical production level. Information about a plant's typical production level is important because it will enable the Agency to more fully assess the scope and impacts of any future regulatory activity. In addition, Question 9 asks for a plant's maximum production capacity because the availability of excess capacity can affect the feasibility and cost of certain options for reducing formaldehyde emissions. These data will be used in conjunction with the information collected in question 10 to estimate the aggregate production of pressed wood products by various formaldehyde emission levels and certification standards. This information is important for estimating the benefits and costs of potential actions to control emissions.

Question 10 asks the respondent to complete a table on the type(s) of binder or resin technology recently used or anticipated to be used, the emission certifications that the products qualify for (if any), and the formaldehyde levels emitted by the pressed wood products. Respondents are asked to provide information for each pressed wood category, and as applicable, specific classes of products within each category, where classes differ in their binder/resin technology, formaldehyde emission certification standard category, or formaldehyde emission profile. Question 10 also asks that the respondents provide, as appropriate, the relative share of the production of each product category that is represented by each adhesive/emissions class. In conjunction with the information collected in question 9, EPA will use this information to develop a baseline for resin technologies, formaldehyde emission rates, and compliance with various standards across pressed wood categories. This information is important for estimating the benefits and costs of potential actions to control emissions. EPA will use all of this information to inform its determination of whether and what type of action on formaldehyde emissions from pressed wood products may be warranted.

#### *Recent or Planned Changes Resulting in Lower Formaldehyde Emissions (Section III)*

Questions 11 and 12 ask the respondent if they have made recent changes (Question 11) or have plans to make changes (Question 12) that will result in lower product formaldehyde emissions, for each of the pressed wood products manufactured at the plant. The questions also ask about the intent of the change (whether the primary purpose was to lower product formaldehyde emissions or whether the change was made for other reasons). EPA will use information on the reasons for past or future emissions reductions to determine the extent to which emissions reductions are likely to occur in the future in the baseline (i.e., without EPA action).

#### *Issues That May Affect Ability to Reduce Formaldehyde Emissions or Switch to a No-Added Formaldehyde (NAF) Resin (Section IV)*

Question 13 asks facilities that are using a formaldehyde-based resin to describe the issues they would likely face in order to further reduce formaldehyde emissions. Question 14 asks facilities that are using a formaldehyde-based resin to describe the issues they would likely face in order to switch to a NAF resin. EPA will use information from responses to these questions to determine the feasibility and cost for facilities to take additional steps to reduce formaldehyde emissions and/or adopt NAF resin technology.

#### **4(b)(ii) Respondent Activities**

EPA will first contact pressed wood manufacturers by telephone to identify a knowledgeable person able to respond to the survey questions. The survey will be sent to each pressed wood manufacturers, who will be asked to complete and return the survey instrument. Completion of the survey involves the following steps:

- **Reviewing instructions:** Respondents will need to read the instructions for the survey;
- **Search data sources:** Respondents may need to consult records and review plant information regarding production techniques, equipment types, expenditure histories, and financial and company information, prior to completing the survey;
- **Complete and review the collection of information:** Respondents will need to complete the survey and review their answers; and
- **Transmit or otherwise disclose the information:** Respondents will need to return the completed survey to EPA.

Non-respondents will receive up to two reminder calls encouraging them to participate. If EPA decides to issue subpoenas because it does not receive a sufficient response rate to accurately characterize the industry, the initial non-respondents will need to review the subpoena, as well as following the steps outlined above (reviewing instructions, searching data sources, completing and reviewing the collection of information, and transmitting the information).

This questionnaire asks for readily obtainable information, e.g., information known or easily accessible by technical, managerial, or supervisory employees of the plant who are responsible for manufacturing, processing, technical services, or marketing. The plant does not need to generate new information to complete the survey. For example, the questionnaire asks for information on formaldehyde emission levels from pressed wood products. If the plant has not already tested its products for formaldehyde emissions, it does not need to test them in order to respond to this questionnaire.

The collection will be a one-time event, and there will be no requirement for respondents to maintain records to support their responses. However, EPA is suggesting that respondents keep a copy of the completed questionnaire for their files in case the Agency contacts them with any follow-up questions after reviewing their responses.

## **5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

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

EPA will conduct the following activities in administering the survey:

- Send letters to pressed wood manufacturers, notifying them of the upcoming survey;
- Place telephone calls to each company to identify a knowledgeable person to receive the survey;
- Send the survey to each company;
- Place reminder telephone calls to non-respondents;
- Respond to technical assistance questions regarding the survey;

- Receive completed surveys, review and code the responses, and enter responses into the project spreadsheet;
- Analyze the results; and
- Issue subpoenas under TSCA section 11 if necessary.

### **5(b) Collection Methodology and Management**

Data collection will be accomplished using a written survey. A telephone call will initially be placed to each pressed wood manufacturer to determine the name of an appropriate contact person at the plant. Once that person is identified, he or she will be asked to participate in the survey. Based on the contact person's preference, the survey will be sent electronically (on USB flash drive) or in hardcopy. The recipient will be asked to complete and return the survey within a five-week timeframe. Respondents will be encouraged to complete an electronic copy of the survey by USB flash drive, which reduces transcription errors when EPA processes the response. Non-respondents will receive up to two reminder calls encouraging them to participate.

A written survey is being used because some of the information EPA is requesting may require the respondent to consult records or other documents at the plant, which would be difficult to do during a telephone survey. In addition, the written survey method will allow the respondent to complete the survey at his or her convenience.

Hardcopy survey responses will be key-entered into an electronic file. Responses will be double entered to ensure a high level of data accuracy and avoid transcription-related data entry errors. The two entries will be compared by computer. If there is a difference between the two entries, the hard copy will be reviewed to determine the correct entry, in order to determine a single correct value for each entry.

### **5(c) Small Entity Flexibility**

EPA has identified a list of roughly 343 U.S. plants manufacturing pressed wood products. Some of these manufacturers are small businesses as defined by the Small Business Administration's size standards (codified at 13 CFR part 121). EPA considered collecting data from only a sample of manufacturers, but determined that a census (a survey administered to the entire population of pressed wood manufacturers, including small businesses) is appropriate. A census will more accurately characterize the industry. EPA needs to include small businesses in the survey so that it can better estimate potential small business impacts in the event the Agency ultimately decides to proceed with a regulatory action.

EPA has designed the survey to minimize respondent burden while obtaining sufficient and accurate information. Where possible, EPA will pre-fill the survey sent to each plant with company-specific identification information for the respondent to verify. The survey also employs the use of checkboxes where feasible, or provides a set of potential responses for respondents to choose from. In response to public comments and pre-testing, EPA has revised the survey in order to clarify some of the questions. These changes help to minimize respondent burden while ensuring the practical utility of the data.

**5(d) Collection Schedule**

Exhibit 1 provides the schedule of the various tasks involved in conducting the proposed survey. As shown in the schedule, data collection would start within one week of OMB approval of the ICR and would end eight weeks later. Respondents would be given five weeks from the time they receive the survey package to return their completed survey. EPA would then process the data and analyze it for potential non-response bias. If EPA issues subpoenas under TSCA § 11(c) requiring non-respondents to complete and return the survey, there will be additional time required for EPA to issue the subpoenas, as well as for the recipients to complete the surveys and return them to EPA, and for EPA to clarify responses (as needed) and process the data.

**Exhibit 1. Schedule for Pressed Wood Manufacturing Industry Survey**

Task	Week (from receipt of OMB approval)													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Send notification letter to manufacturers	■													
Conduct telephone calls to identify an appropriate contact at each manufacturing plant		■	■	■	■									
Send survey to manufacturing plants		■	■	■	■	■								
Provide technical assistance for questions from manufacturers			■	■	■	■	■	■						
Receive completed surveys			■	■	■	■	■							
Place reminder telephone calls to manufacturers whose completed surveys have not been received					■	■	■	■	■					
Call respondents to clarify responses, if needed									■	■				
Process data										■	■			
Analyze data for potential non-response bias												■	■	■

## 6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

### 6(a) Estimating Respondent Burden

EPA will request that all U.S. pressed wood manufacturers complete the survey. Each section of the survey is expected to be completed by technical and clerical staff, and reviewed by managerial staff. Respondent activities include reading the survey instructions, gathering information and data, completing the survey form, and reviewing survey responses. The exhibit reflects the assumption that technical and clerical staff will devote their time to reading instructions, gathering information, and completing the survey form; managers will devote their time to reading instructions and reviewing survey responses.

Exhibit 2 presents the approximate average number of hours required for a typical respondent to complete the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire. Exhibit 3 presents the approximate average number of hours required for a respondent to perform the same activities for the Hardboard and Structural Composite Manufacturers Questionnaire.

A typical respondent is estimated to need an average of 19.61 hours to complete the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire (see Exhibit 2). This includes the weighted average time to answer the technical identification and reminder phone calls<sup>1</sup> and time to review a subpoena (should EPA issue them after the completion of the voluntary survey).<sup>2</sup>

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<sup>1</sup> The following assumptions were made for estimating burden associated with phone calls: all plants receive a phone call to identify a technical contact prior to completing the survey; all plants receive the first reminder to complete a survey and 50 percent of plants receive the second reminder. Each of those calls is assumed to take approximately five minutes on average.

<sup>2</sup> The burden estimates for completing the survey are calculated assuming that all of the companies that receive the questionnaire will complete it and return it to EPA. If EPA does not achieve a response rate sufficient to accurately characterize the industry, EPA will consider whether to exercise its TSCA § 11(c) subpoena authority to require non-respondents to complete and return the questionnaire. Aside from the time to read the subpoena, the average burden and cost per respondent to complete the questionnaire is not expected to change based on whether the response was submitted voluntarily or as a result of a subpoena. The total number of manufacturers receiving the survey would not change if the Agency exercised its TSCA § 11(c) authority, since the subpoenas would only be issued to companies that had received the survey and had not responded voluntarily. Therefore, the only additional burden that would result if EPA issued subpoenas would be the time to review the subpoena document.

Since EPA will not know whether it has achieved a sufficient response rate to accurately characterize the industry until after it receives the survey responses, the Agency does not know at this time whether it will exercise the TSCA § 11(c) authority, or how many subpoenas it might issue. Lacking other information, the burden due to subpoenas is calculated by assuming that EPA will issue subpoenas to non-respondents, that the initial non-response rate will be 20 percent (so that subpoenas will be issued to 20 percent of the plants in the industry), and that each subpoenaed non-respondent will spend the equivalent of 1 hour of managerial time reviewing the subpoena (for instance, having the company's lawyer read the subpoena).

These assumptions are only made to account for the possibility that there will be additional burden from potential subpoenas. It is unlikely that EPA would issue subpoenas if there is a 20 percent non-response rate, since EPA's objective is to achieve an 80 percent response rate for the survey. Further information on survey objectives and non-response is provided in Part B of this supporting statement. Using this estimate of 1 hour of time for 20 percent of respondents results in a weighted average estimate across all respondents of 0.2 hours per respondent to review a subpoena.



Respondents completing the Hardboard and Structural Composite Manufacturers Questionnaire are expected to take an average of 13.81 hours to complete the same activities (see Exhibit 3). The Hardboard and Structural Composite Manufacturers Questionnaire takes less time on average than the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire, because the former collects less detailed information.

EPA initially estimated that the burden of responding to the survey would average 19.6 hours per respondent. After publishing the initial draft of the ICR for public comment, EPA conducted a pretest of the draft survey with 5 pressed wood manufacturers. Staff members at these manufacturers completed the questionnaire and returned it to EPA. The staff were asked how many hours it took to read the instructions, compile the information, coordinate responses where multiple staff were involved, fill out the form, and return the questionnaire. The burden hours per respondent reported by these companies ranged from 4 to 24 hours per plant, with an average of 13 hours. EPA decided to keep the 19.6 hour estimate for the revised Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire, which is likely to overestimate the actual average reporting burden. While additional questions have been added to this questionnaire, the time required to respond to these new questions will be offset by improvements to the questions and instructions that clarify the information being requested, which will make it easier and faster for respondents to provide their answers. EPA is using an estimate of approximately 13 hours for the Hardboard and Structural Composite Manufacturers Questionnaire. Again, EPA believes that this will overestimate the actual average reporting burden, because the Hardboard and Structural Composite Manufacturers Questionnaire is significantly shorter and simpler than the version of the questionnaire used in the pretest (for which respondents spent an average of 13 hours to review and complete).

There are 167 respondents expected to complete *only* the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire, 171 respondents expected to complete *only* the Hardboard and Structural Composite Manufacturers Questionnaire, and 5 respondents expected to complete *both* questionnaires. Thus, a total of 172 respondents are expected to complete the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire and 176 respondents are expected to complete the Hardboard and Structural Composite Manufacturers Questionnaire.

**Exhibit 2. Estimated Average Burden Hours for Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire**

<b>Burden Category</b>	<b>Activity</b>	<b>Technical</b>	<b>Managerial</b>	<b>Clerical</b>	<b>Total Burden</b>
<b>Phone Conversations</b>	Technical Contact Identification Call	0.04	0.04	0.00	0.08
	Reminder Calls	0.06	0.06	0.00	0.13
<b>Survey Section I General Information</b>	Read Instructions	0.3	0.1	0.0	0.4
	Gather Information	0.5	0.0	0.0	0.5
	Complete Form	0.2	0.0	0.0	0.2
	Review	0.3	0.2	0.0	0.5
<b>Survey Section II Products Manufactured</b>	Read Instructions	0.5	0.3	0.0	0.8
	Gather Information	3.5	0.0	0.5	4.0
	Complete Form	1.5	0.0	0.5	2.0
	Review	0.5	1.5	0.0	2.0
<b>Survey Sections III, IV, V, VI, &amp; VII Changes to Manufacturing Process</b>	Read Instructions	0.5	0.3	0.0	0.8
	Gather Information	3.5	0.0	0.5	4.0
	Complete Form	1.5	0.0	0.5	2.0
	Review	0.5	1.5	0.0	2.0
<b>Subpoena</b>	Review Subpoena	0.00	0.20	0.00	0.20
<b>Total Burden Hours for Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire</b>		<b>13.4</b>	<b>4.2</b>	<b>2.0</b>	<b>19.61</b>
Note: The average burden presented in this table is the average burden for the estimated 172 respondents who will complete the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire.					

**Exhibit 3. Estimated Average Burden Hours for Hardboard and Structural Composite Manufacturers Questionnaire**

<b>Burden Category</b>	<b>Activity</b>	<b>Technical</b>	<b>Managerial</b>	<b>Clerical</b>	<b>Total Burden</b>
<b>Phone Conversations</b>	Technical Contact Identification Call	0.04	0.04	0.00	0.08
	Reminder Calls	0.06	0.06	0.00	0.13
<b>Survey Section I General Information</b>	Read Instructions	0.3	0.1	0.0	0.4
	Gather Information	0.5	0.0	0.0	0.5
	Complete Form	0.2	0.0	0.0	0.2
	Review	0.3	0.2	0.0	0.5
<b>Survey Section II Products Manufactured</b>	Read Instructions	0.5	0.3	0.0	0.8
	Gather Information	3.5	0.0	0.5	4.0
	Complete Form	1.5	0.0	0.5	2.0
	Review	0.5	1.5	0.0	2.0
<b>Survey Sections III &amp; IV Changes to Manufacturing Process</b>	Read Instructions	0.2	0.1	0.0	0.3
	Gather Information	1.2	0.0	0.2	1.3
	Complete Form	0.5	0.0	0.2	0.7
	Review	0.2	0.5	0.0	0.7
<b>Subpoena</b>	Review Subpoena	0.00	0.20	0.00	0.20
<b>Total Burden Hours for Hardboard and Structural Composite Manufacturers Questionnaire</b>		<b>9.5</b>	<b>3.0</b>	<b>1.4</b>	<b>13.81</b>
Note: The average burden presented in this table is the average burden for the estimated 176 respondents who will complete the Hardboard and Structural Composite Manufacturers Questionnaire.					

These unit burden estimates are average values. As with any average, some respondents will be above the average and others will be below it.

**6(b) Estimating Respondent Costs**

Wages and fringe benefits for managerial, professional/technical, and clerical labor were obtained from the Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation* (ECEC) data, for December 2007, for manufacturing industries.<sup>3</sup> The cost of fringe benefits such as paid leave and insurance, specific to each labor category, were taken from the same ECEC series.

<sup>3</sup> See: Supplementary Table 2: *Employer costs per hour worked for employee compensation and costs as a percent of total compensation. Private industry workers in manufacturing industries, by occupational group, establishment size and bargaining status*, available at: [www.bls.gov/ncs/ect/sp/ecsuptc5.pdf](http://www.bls.gov/ncs/ect/sp/ecsuptc5.pdf).

The U.S. Bureau of Labor Statistics defines straight-time wage and salary rates as total earnings before payroll deductions, including production bonuses, incentive earnings, commission payments, and cost-of-living adjustments. Benefits include: paid leave (vacations, holidays, sick leave, and personal leave); supplemental pay (premium pay for work in addition to the regular work schedule, shift differentials, and nonproduction bonuses); insurance benefits (life, health, short-term disability, and long-term disability); retirement and savings benefits (defined benefit and defined contribution plans); and legally required benefits (Social Security, Medicare, federal and state unemployment insurance, and workers' compensation).

EPA further adjusted these rates to reflect overhead costs of 17 percent. Following are the estimated loaded wage rates used in the analysis:

- Manager: \$69.21/hour;
- Engineer: \$55.42/hour; and
- Clerk: \$27.59/hour.

To determine the labor costs for respondents, unit time estimates for technical, managerial, and clerical personnel were multiplied by the hourly wage rate for each labor category. The estimated labor cost per respondent for each activity required to complete the survey is presented in Exhibit 4.

Because respondents will not need to purchase any goods (including equipment or machinery) to respond to the survey, they will not incur capital costs as a result of the survey.

**Exhibit 4. Estimated Average Cost Per Respondent**

Activity	Technical (\$55.42/hr)	Managerial (\$69.21/hr)	Clerical (\$27.59/hr)	Total Labor Cost	Photocopy Cost	Total Cost
<b>Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire</b>	\$743	\$291	\$55	\$1,088	\$5.04	\$1,093
<b>Hardboard and Structural Composite Manufacturers Questionnaire</b>	\$526	\$208	\$39	\$773	\$1.04	\$774

EPA assumed that each respondent would make a copy of the completed questionnaires for their files. The number of pages in each completed survey depends on the individual respondent (additional pages are needed, for example, to complete questions separately for each type of product, if a respondent manufactures more than one type of pressed wood product). Assuming a respondent completes two copies of each question where multiple responses are possible, the completed Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaires would be 63 pages. Likewise, the Hardboard and Structural Composite Manufacturers Questionnaire would be 13 pages assuming a respondent completes two copies of each question where multiple responses are possible. At an estimated photocopy cost of \$0.08 per page, the total cost associated with photocopying is estimated at

\$5.04 per respondent for the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire, and \$1.04 per respondent for the Hardboard and Structural Composite Manufacturers Questionnaire.<sup>4, 5</sup> EPA plans to provide a pre-paid return envelope with the survey, so the Agency does not expect respondents to incur any other costs to respond to the survey.

A typical respondent to the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire is estimated to incur a labor cost of \$1,088 and copying costs of \$5.04 to respond to the survey, for a total cost of \$1,093. A typical respondent to the Hardboard and Structural Composite Manufacturers questionnaire is estimated to incur a labor cost of \$773 and copying costs of \$1.04 to respond to the survey, for a total cost of \$774.

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

EPA plans to distribute the survey to all U.S. pressed wood manufacturing plants. The Agency has currently identified 343 such manufacturing facilities although the number could increase or decrease slightly, based on changes in the industry (such as plant closures) or further research to update EPA’s plant list, prior to the data collection.

The total burden and costs to all respondents are estimated by multiplying the estimated average burden per respondent from Section 6(b) and the estimated average cost per respondent from Section 6(c) by the estimated number of respondents. Exhibit 5 presents the estimated total respondent burden of 5,804 hours and the estimated total respondent cost of \$324,220.

**Exhibit 5. Total Burden and Costs to All Respondents**

<b>Activity</b>	<b>Number of Respondents*</b>	<b>Average Burden per Respondent</b>	<b>Average Cost per Respondent</b>	<b>Total Burden for All Respondents</b>	<b>Total Cost for All Respondents</b>
Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire	172	19.61 hours	\$1,093	3,373	\$187,996
Hardboard and Structural Composite Manufacturers Questionnaire	176	13.81 hours	\$774	2,431	\$136,224
<b>Total</b>	<b>343</b>			<b>5,804 hours</b>	<b>\$324,220</b>
* The number of respondents for the two questionnaires does not add to the total of 343 because 5 respondents are expected to submit both types of questionnaires. The 343 respondents would submit a total of 348 responses.					

<sup>4</sup> Assuming respondents would only copy the survey form, and would keep the original of the instructions rather than returning it to EPA.

<sup>5</sup> The photocopying estimate reflects an average of prices from Copy Cop, Kinkos, Staples, and Office Max, and is assumed to be representative of costs for respondents to make copies using their own photocopy equipment and supplies, or to print off a copy of their response if they complete the survey electronically.

In reality, some survey recipients will not complete and return the survey. If EPA does not receive a sufficient response rate to accurately characterize the industry, EPA will consider whether to exercise the authority available to it under TSCA § 11(c) to issue subpoenas. EPA could issue subpoenas to non-respondents requiring them to complete and return the survey. Since EPA will not know whether it has achieved a sufficient survey response rate to accurately characterize the industry until after it receives the survey responses, the Agency does not know at this time whether it will exercise the TSCA § 11(c) authority, or how many subpoenas it might issue. Total burden and total costs are calculated assuming that all manufacturing plants will complete the survey and return it to EPA, but that 20 percent will only do so in response to a subpoena.

EPA expects that if it does not exercise its TSCA § 11(c) subpoena authority, the total burden and cost estimates in Exhibit 5 would not change significantly. The average burden and cost per respondent to complete a survey instrument is not expected to change based on whether the response was submitted voluntarily or as a result of a subpoena. The total number of manufacturers receiving the survey would not change if the Agency issued subpoenas, since the subpoenas would only be issued to companies that had received the survey and had not responded voluntarily. So assuming there is 100 percent voluntary compliance (without issuing subpoenas), the estimated total burden and cost would be 5,734 hours and \$319,472 if EPA does not issue subpoenas to make responding mandatory for non-respondents.

#### **6(d) Estimating Agency Costs**

EPA will use in-house staff and contractors to conduct the survey. EPA staff will oversee the contractor staff working on the survey, and answer questions from pressed wood manufacturers about the survey. It is estimated that administering the survey will require 1/7th of a full-time employee (FTE) at EPA headquarters. The cost for EPA staff is estimated to be \$69.00 per hour, based on the 2007 wage rate for a GS-13, Step 5 employee in the Washington-Baltimore locality, with a government overhead factor of 1.6 to account for fringe benefits and overhead. This is equivalent to an EPA staff cost of approximately \$20,000 to administer the survey.

EPA will incur costs for contractor staff to handle the survey responses, process and analyze the data, and prepare survey documentation. In addition, the Agency will incur costs for (1) placing long-distance phone calls to all pressed wood manufacturers, (2) duplicating and sending the survey in electronic or paper format, with pre-filled identification information, and (3) providing a pre-paid envelope for respondents to return the completed survey.

Exhibit 6 presents the Agency costs for each activity associated with conducting the survey. Total Agency costs are estimated at \$120,000.

**Exhibit 6. Estimated Agency Costs**

Activity	Agency Cost
Perform telephone calls to each company to identify an appropriate contact person at each plant; perform follow-up calls to non-respondents	\$40,000
Copy and mail the survey (including pre-filled identification information) in electronic or paper format	\$10,000
Answer respondent questions and provide technical assistance	\$10,000
Receive responses; process and track CBI data	\$5,000
Review and code responses and enter responses into project spreadsheet	\$25,000
Prepare results for analysis and document methods and results	\$10,000
Miscellaneous	\$20,000
<b>Total Cost</b>	<b>\$120,000</b>

**6(e) Total Burden Hours and Costs**

Exhibit 7 presents the overall estimated burden and cost of this data collection effort. EPA estimates that respondents will incur a total burden of approximately 5,804 hours at an estimated cost of approximately \$324,220. EPA estimates that the Agency’s cost will be approximately \$120,000. EPA has dedicated sufficient resources to ensure the proper processing and use of the information being collected.

**Exhibit 7. Total Estimated Respondent Burden and Cost and Agency Cost**

Respondent Burden (Hours)	Respondent Cost	EPA Cost
5,804	\$324,220	\$120,000

Exhibit 8 summarizes the respondent burden (in terms of the number of respondents, the number of small respondents, the responses per respondent, the burden per response, and the total burden) for the two questionnaires and for the entire survey.

**Exhibit 8. Summary of Respondent Burden**

<b>Activity</b>	<b>Number of Respondents*</b>	<b>Number of Small Respondents†</b>	<b>Responses per Respondent</b>	<b>Burden per Response (hours)</b>	<b>Total Burden (hours)</b>
Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire	172	90	1	19.61	3,373
Hardboard and Structural Composite Manufacturers Questionnaire	176	92	1	13.81	2,431
Total	343	182	1	---	5,804
<p>* The number of respondents for the two questionnaires does not add to the total of 343 because 5 respondents are expected to submit both types of questionnaires. The 343 respondents would submit a total of 348 responses.            † Based on the plants for which EPA was able to identify employment and revenue data for the parent company, 52% of pressed wood manufacturers are estimated to qualify as small businesses under SBA’s small business size standards.</p>					

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

This ICR is not a renewal or modification of an existing ICR, so there is no change in burden to an existing ICR. The entire burden due to this information collection is new, due to a program change (in this case, a one-time collection).



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

The annual public burden for this collection of information is estimated to average nearly 20 hours per response for the Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers Questionnaire, and almost 14 hours per response for the Hardboard and Structural Composite Manufacturers Questionnaire. According to the PRA, “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; 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 current and valid OMB control number. The OMB control numbers for EPA’s regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and are included in the related collection instrument and form.

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 No. EPA-HQ-OPPT-2008-0717. The docket is available for public viewing at the Pollution Prevention and Toxics Docket in the EPA Docket Center (EPA/DC). The EPA/DC Public Reading Room is located in the EPA West Building, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The EPA/DC 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 EPA/DC Public Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. An electronic version of the public docket is available through the Federal Docket Management System (FDMS) at [www.regulations.gov](http://www.regulations.gov). Use FDMS to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select “search,” then key in the docket ID number identified above. 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 Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OPPT-2008-0717 and OMB control number 2070-TBD in any correspondence.

## **APPENDICES TO THE SUPPORTING STATEMENT**

- Appendix A:** Relevant Sections of Authorizing Statute
- Appendix B:** Public Consultations
- Appendix C:** Public Comments on Proposed ICR and Responses to Public Comments
- Appendix D:** Instructions and Survey Instrument for Hardwood Plywood, Medium Density Fiberboard, and Particleboard Manufacturers
- Appendix E:** Instructions and Survey Instrument For Hardboard And Structural Composite Manufacturers