

**STANDARD FORM 83-I SUPPORTING STATEMENT
FOR OMB REVIEW OF EPA ICR No.____.____:**

**INFORMATION COLLECTION REQUEST FOR PULP AND PAPER SECTOR NEW
SOURCE PERFORMANCE STANDARDS (NSPS) AND NATIONAL EMISSION
STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) RESIDUAL RISK
AND TECHNOLOGY REVIEW (RTR)**

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February 4, 2011

**SUPPORTING STATEMENT
INFORMATION COLLECTION REQUEST FOR PULP AND PAPER SECTOR NEW
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Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title of the Information Collection

“Information Collection Request for Pulp and Paper Sector New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) Residual Risk and Technology Review (RTR).” This is a new information collection request (ICR).

(b) Short Characterization

This information collection is being conducted by EPA’s Office of Air and Radiation (OAR) to assist the EPA Administrator, as required by sections 111(b), 112(d), and 112(f)(6) of the Clean Air Act (CAA), as amended, to determine the current affected population of pulp and paper processes and to reevaluate emission standards for this source category. The information from this ICR would also be made available to the public.

This is a one-time information collection. Currently, information necessary to identify pulp and paper mills is available from the Lockwood-Post (facility name and address) and from EPA’s National Emissions Inventory (NEI). Neither the Lockwood-Post nor the NEI contain all of the details (capacity, fuel types, operating schedule, emission source design, materials processed, emissions collection and control systems, regulatory alternatives used, and emission test data) necessary to characterize pulp and paper NSPS and NESHAP affected sources for purposes of regulatory analyses. Although some of the needed information may be included in title V or State air emission permits, many permits do not contain all of the detail needed and are not readily available from any single source. Furthermore, there are no readily available sources for previously conducted emissions test results (since the mid-1990s) that will provide data for emissions of the variety of pollutants under consideration. To obtain this information, EPA is soliciting information with a survey, under authority of CAA section 114, from all potentially affected units. EPA intends to administer the survey in electronic (spreadsheet) format. The survey will be sent to all pulp and paper manufacturing facilities listed in the Lockwood-Post.

The EPA estimates the total cost to industry of the electronic information collection (gathering, entering, and quality assuring (QA) of data submitted in response to the survey for 352 respondents) will be 161,106 hours and \$15,244,683, which includes \$6,336 in operation and maintenance (O&M) costs for postage for mailing survey responses to EPA. The average burden per respondent is 458 hours and \$43,291.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The pulp and paper production source category includes any facility engaged in the production of pulp and/or paper. This category includes, but is not limited to, integrated mills (where pulp alone or pulp and paper or paperboard are manufactured on-site), non-integrated mills (where either paper/paperboard or pulp are manufactured onsite, but not both), and secondary fiber mills (where waste paper is used as the primary raw material). The pulp and paper production process units include operations such as pulping, bleaching, chemical recovery, and papermaking. Different pulping processes are used, including chemical processes (kraft, soda, sulfite, and semi-chemical) and mechanical, secondary fiber, or non-wood processes. The three federal emission standards that are the subject of this information collection include:

1. Standards of Performance for Kraft Pulp Mills (40 CFR part 60, subpart BB),
2. National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR part 63, subpart S), and
3. National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR part 63, subpart MM).

The Standards of Performance (i.e., the NSPS) currently regulates particulate matter (PM) and total reduced sulfur (TRS) emissions from kraft pulping processes. In general, NESHAP subpart S covers hazardous air pollutant (HAP) emissions from the pulp production areas (e.g., pulping system vents, pulping process condensates) at chemical, mechanical, secondary fiber, and non-wood pulp mills; bleaching operations; and papermaking systems. The subpart S standards include several alternative emission limits for each covered process that are designed to provide flexibility and to promote and encourage the use of new technology, particularly combined air/water controls and pollution prevention technologies. The NESHAP subpart MM regulates HAP emissions from the chemical recovery combustion areas of chemical pulp mills (kraft, sulfite, semi-chemical, and soda wood pulping processes). For existing kraft

and soda combustion units, the subpart MM standards also include a compliance alternative that allows netting of PM emissions for the entire chemical recovery system.

Section 111(b)(1)(B) of the CAA mandates that EPA review and, if appropriate, revise existing NSPS at least every 8 years. The NSPS for kraft pulp mills was promulgated in 1978, and reviewed in 1986. Another review of the kraft pulp mill NSPS is required under the CAA. Similarly, Section 112(f)(2) of the CAA directs EPA to conduct risk assessments on each source category subject to maximum achievable control technology (MACT) standards and determine if additional standards are needed to reduce residual risks. The section 112(f)(2) residual risk review is to be done 8 years after promulgation. Section 112(d)(6) of the CAA requires EPA to review and revise the MACT standards, as necessary, taking into account developments in practices, processes, and control technologies. The section 112(d)(6) technology review is to be done at least every 8 years. The NESHAP for the pulp and paper industry (40 CFR part 63, subpart S) was promulgated in 1998 and is due for review under CAA sections 112(f)(2) and 112(d)(6). Likewise, the NESHAP for chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills (40 CFR part 63, subpart MM) was promulgated in 2001 and is also due for review. In addition to the CAA-required reviews, recent case law, legal petitions, and a notice of intent (NOI) to sue suggest the need to review the pulp and paper NESHAP and NSPS. For example, in December 2008, the U.S. Court of Appeals for the D.C. Circuit vacated the startup, shutdown, and malfunction (SSM) provisions contained in the NESHAP General Provisions that apply to pulp and paper mills. In January 2009, EPA received a petition for rulemaking requesting that EPA revise various NESHAP, including the NESHAP for chemical recovery combustion sources at pulp mills, to make the NESHAP consistent with CAA precedent established in recent judicial rulings. In July 2010, EPA received a NOI from Californians for Alternatives to Toxics (CATs) and the Center for Biological Diversity (CBD), contending that EPA failed to review the NSPS for kraft pulp mills within the statutory deadline under CAA section 111(b)(1)(B). To the extent that these legal actions need to be addressed in the pulp and paper NESHAP and NSPS, EPA intends to investigate potential rule revisions at the same time as the CAA statutory reviews are conducted.

EPA is not asking synthetic area sources for emissions information to respond the NEI update section of the survey (Part 2). Identified synthetic area sources will not be used to develop risk assessments for this rule. We have requested plants to identify whether they are a

synthetic area source or not in their survey response. These sources are still required to respond to Part 1 of the survey and, if applicable, Part 3 in order to identify new technology and/or manufacturing practices that may reduce HAP emissions.

The data used as the basis for the originally promulgated pulp and paper NESHAP are over 15 years old, and data used to review the NSPS are over 20 years old. The Agency is aware that significant changes have been made in the intervening years in the number of affected facilities, in industry ownership practices, and in emission collection and control configurations. Further, in light of the statutory requirements for reviewing emission standards under CAA sections 111(b) and 112 and the recent case law, legal petitions, and NOI regarding those requirements, the Agency has concluded that obtaining updated information will be crucial to informing its decisions on the NSPS review and NESHAP RTR for pulp and paper manufacturing sources.

The EPA has already begun assembling data for a preliminary residual risk assessment for the pulp and paper NESHAP subparts S and MM. Data sets derived from the EPA's 2005 National Scale Air Toxics Assessment (NATA) National Emissions Inventory (NEI) will be used for the RTR. Several pulp and paper mills have voluntarily updated their NEI data sets for RTR purposes in recent years and few additional refinements are expected on the NEI data sets for these mills. However, there remain a number of pulp and paper mills for which substantial updates to their NEI data sets would be useful in order for EPA to accurately consider RTR for the pulp and paper NESHAP standards. In addition, there may be some mills for which no pulp and paper MACT category NEI data are currently available. Preliminary risk analysis results for the pulp and paper sector (based on the current NEI data sets) indicate that some mills may present risk above the thresholds for further consideration under the residual risk process. Additional mill-specific information would allow EPA to better characterize emission sources, refine the risk analysis, and to address any unacceptable residual risk that remains. An update of the 2005 NATA NEI data sets and more specific information needed for rulemaking regulatory analyses would be derived from the ICR. Information collected directly from pulp and paper mills will have the greatest practical utility for purposes of performing the RTR and NSPS reviews as information from the affected industry will contain the most up-to-date, accurate, and reliable equipment and operational data for each mill. The ICR will request that new information be supplied for a 2009 base year, and therefore, will not suffer from the considerable "lag time"

that can be associated with different inventory and permit review cycles (e.g., where the currently available inventory does not yet reflect recent changes in equipment).¹

To allow respondents more time to complete the survey, the ICR has been divided into three parts, with each part due on a different date. Part I requests information on the pulp and paper production process addressed under the subpart S NESHAP and subpart BB NSPS and will be due within 30 days of receipt of the survey. An additional 15 days is provided for up to 40 percent of the mills owned by pulp and paper companies operating multiple (more than two) mills. Part II requests the NEI update and will be due within 100 days of receipt of the survey. Part III requests information on the chemical recovery combustion process addressed under the subpart MM NESHAP and subpart BB NSPS and will be due within 180 days of receipt of the survey. Mills required to complete Part III may postpone until the deadline for Part III submittal of criteria air pollutant emissions test data and continuous emissions monitoring system (CEMS) data required for the emission units listed in Part I Attachment 1.

CAA section 114(a) states that the Administrator may require any owner or operator subject to any requirement of the 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.

(b) Use/Users of the Data

As mentioned previously, the data used for the originally promulgated NESHAP and NSPS are outdated and do not reflect the significant changes in emissions collection and control configurations that have occurred since promulgation of the MACT standards. The MACT standards contain a number of compliance alternatives to allow for a variety of equipment configurations and process changes to be used in meeting the emission standards and effluent

¹There is a “lag time” associated with compiling large State or national emission inventories. For example, an updated version of the NEI database is compiled every three years, but the information contained in the NEI may be based on prior years if states do not submit current data. There can also be a “lag time” associated with posting of recent permits to State websites (particularly if permits are only posted every 5 years as they are reviewed).

limitations established under the Clean Water Act. At present, the EPA does not have a data base reflecting the post-MACT and post-effluent guidelines configurations of pulp and paper emission units and air pollution control systems. It is essential for the EPA to have updated information to use in the regulatory analyses required under CAA sections 112(d) and 112(f)(2). In addition, this updated information will be used to perform the NSPS review required under CAA section 111(b). By collecting information for all of the CAA-required reviews at the same time (i.e., the subpart S and MM RTR reviews and the subpart BB NSPS review), the Agency can make use of a single collection of information that would allow the Agency to consider control strategies that are the most effective for both HAP and criteria air pollutants (such as PM, SO₂, and NO_x) that are regulated under NSPS. The data would also allow the Agency to evaluate compliance options for startup and shutdown periods, and to consider ways to consolidate monitoring, reporting, and recordkeeping requirements among the different rules under review.

The data collected will be used to update facility information and equipment configuration, develop new estimates of the population of affected units, and identify the control measures and alternative emission limits being used for compliance with the existing rules that are under review. This information, along with existing permitted emission limits will be used to establish a baseline for purposes of the regulatory reviews. The emissions test data (test reports and CEMS data) collected will be used to verify the performance of existing control measures, examine variability in emissions, evaluate emission limits, and to determine the performance of superior control measures considered for purposes of reducing residual risk or as options for best demonstrated technology (BDT) under the NSPS review. Emissions data will also be used along with process and emission unit details to consider subcategories for further regulation and to estimate the environmental and cost impacts associated with any regulatory options considered.

In addition to informing the CAA-required RTR and NSPS regulatory analyses for the pulp and paper sector, it is EPA's intent that the NEI updates supplied through this information collection be used in future versions of the NEI and its successor, the Emissions Inventory System (EIS). The NEI is used by EPA, States, and the public for a variety of purposes including tracking of national trends in emissions of criteria and hazardous air pollutants. More information in the NEI can be found at <http://www.epa.gov/air/data/neidb.html>.

The non-confidential information collected with this ICR would also be available to the public in the docket and upon request, including pulp and paper industry trade groups that may find the information useful for their ongoing data gathering, analyses, and publications. In addition, such trade groups may wish to use the data collected to review and verify EPA's regulatory conclusions.

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

(a) Non-duplication

The Agency recognizes that some of the information requested in the information collection effort may already be included in the submittals made by individual companies, pursuant to State and national emission inventories, operating permits applications, initial notification forms, and compliance reports. However, the complete extent of the data fields requested under this survey is not available in any consistent or usable format. Additionally, these sources do not provide detailed emissions test data. As mentioned previously, there is a lag time associated with State and national emission inventories, and permit review cycles. There is also a lag time associated with obtaining emission test reports from State agencies (i.e., agencies may be reluctant to release emission test results they have not yet processed). The EPA's proposed information collection seeks up-to-date equipment configuration and operational data for the 2009 operating year, and thus avoids the effects of any such lag time on data availability. Although some State permits are provided to the public as searchable portable document format files (pdfs), many States do not provide electronic versions of their issued Title V permits. Even when the permit is available, the unit-specific operating data are often not contained within the permit. Some of the initial notifications and compliance reports submitted are available in hard-copy only, whereas only the facility-level information (facility name, location, contact) is available in an electronic format. In order to address SSM issues, the Agency has obtained numerous semi-annual compliance reports for pulp and paper processes and found the reports to contain a widely varying level of detail. Such variation in the level of detail of permits and compliance reports means that it would be extremely time consuming for the Agency to extract the level of process detail needed for regulatory analyses from existing documents (assuming that these documents were readily available to EPA), and that significant data gaps would remain even after data from existing documents were compiled.

Emissions test reports are often retained as hard copies by State agencies and thus are not readily available for all mills. Although one pulp and paper industry trade organization (National Council for Air and Stream Improvement [NCASI]) collects and compiles emissions test data in technical bulletins, these bulletins alone (while quite informative and valuable) do not inform all of EPA's emissions data analyses because: (1) the NCASI technical bulletins are coded to mask mill identities such that the emissions data cannot be reconciled with other emissions data available to EPA; (2) the data contained in the NCASI reports may not be reported in the units of measure needed for analysis of emission limits; (3) much of the data pre-dates implementation of the MACT standards, and (4) the data are generally representative of NCASI member mills, whereas information collected by EPA would be requested from the entire population of affected mills.

To summarize, the information requested relevant to the current (post-MACT) equipment configuration and operation, regulatory alternatives, emissions data, and effectiveness of various control systems at removing HAP is not readily available from other sources. In the absence of an industry data collection, the EPA would be forced to try to obtain permits, compliance reports, and emissions test reports from States; extract information from these reports (which vary in detail); and then to fill data gaps where information is not available from the reports obtained. This process of acquiring and extracting data from existing reports would require more time than an industry data collection, and ultimately would be expected to yield incomplete information. Information collected directly from pulp and paper mills would provide the most timely and complete post-MACT data set with the greatest practical utility for purposes of performing the NSPS and RTR reviews that are due to be completed under CAA sections 111(b) and 112(d) and (f)(2).

(b) Public Notice Required Prior to ICR Submission to OMB

As required by the Paperwork Reduction Act of 1995 (PRA) and the subsequent rule issued by the Office of Management and Budget (OMB) on August 29, 1995 (60 FR 44978), the ICR was submitted for a first public review on June 23, 2010 (75 FR 35792), and a second public review on December 7, 2010 (75 FR 76005). A 60-day comment period (ending August 23, 2010) was provided during the first review for the public to submit comments to EPA regarding the proposed new data collection. A total of three comments were received by EPA regarding the proposed ICR. EPA revised the ICR to address the public comments prior to submitting the

ICR to OMB. The second public review (ending January 6, 2011) resulted in two public comments which also have been incorporated into the ICR. The comments received and EPA's response to each comment is available in the regulatory docket established for this rule, EPA-HQ-OAR-2007-0544 at www.regulations.gov.

(c) *Consultations*

Initial feedback was received from the affected industry regarding the scope of a pulp and paper sector survey. Detailed comments on the proposed ICR were received from the industry in August 2010 and December 2010, followed by meetings with the industry in October 2010 and November 2010 to discuss in greater detail the design and content of the ICR. The EPA has implemented many changes to specific ICR questions as a result of these consultations. In addition, EPA revised the survey so that it would be administered in three parts with staggered due dates to provide respondents with additional time to complete the survey. Part I of the ICR will request information on the pulp and paper production process addressed under the subpart S NESHAP and subpart BB NSPS and will be due 30 days after receipt of the survey. An additional 15 days is provided for up to 40 percent of the mills owned by pulp and paper companies operating multiple (more than two) mills. Part II of the ICR will require the facilities to complete an electronic update of their 2005 NATA NEI data set to be used for RTR purposes and will be due 100 days after receipt of the survey. Part III of the ICR will request information on the chemical recovery combustion process addressed under the subpart MM NESHAP and subpart BB NSPS and will be due 180 days after receipt of the survey. Mills required to complete Part III may postpone submittal of criteria air pollutant emissions test data and CEMS data required for the emission units listed in Part I Attachment 1 until the deadline for Part III.

(d) *Effects of Less Frequent Collection*

This ICR will require the owner/operator of each pulp and paper facility to complete an electronic survey in three parts, with staggered due dates. Each part requests different information. EPA expects the information requested in all three parts of this survey to be a one-time effort.

(e) *General Guidelines*

This ICR will adhere to the guidelines for Federal data requestors, as provided at 5 CFR 1320.6.

(f) *Confidentiality*

Respondents will be required to respond under the authority of CAA section 114. If a respondent believes that disclosure of certain information requested would compromise a trade secret, it should be clearly identified as such and will be treated as confidential until and unless it is determined in accordance with established EPA procedure as set forth in 40 CFR Part 2 not to be entitled to confidential treatment. All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B—Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979). Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public without further notice (40 CFR 2.203, September 1, 1976). Because CAA section 114(c) exempts emission data from claims of confidentiality, the emission data provided may be made available to the public. Therefore, emissions data should not be marked confidential. A definition of what EPA considers emissions data is provided in 40 CFR 2.301(a)(2)(i).

(g) *Sensitive questions*

This section is not applicable because this ICR will not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes.*

Respondents affected by this action are owners/operators of mills that are major sources or synthetic area sources of HAP emissions and produce pulp, perform bleaching, or manufacture paper or paperboard products.² In the U.S., there are a total of 352 mills including:

- 112 mills that carry out chemical wood pulping (kraft, sulfite, soda, or semi-chemical),
- 39 mills that carry out mechanical, groundwood, secondary fiber, and non-wood pulping,

² As defined in 40 CFR Part 63, subpart A, “*major source*” means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence. A “*synthetic area source*” is a stationary source which is subject to federally-enforceable conditions that limit its potential to emit to below major source thresholds.

- 93 mills that perform bleaching, and
- 334 mills that manufacture paper or paperboard products.

Some mills perform multiple operations (e.g., chemical pulping, bleaching, and papermaking; pulping and unbleached papermaking; etc.). The counts provided above are counts of potential respondents based on the Lockwood-Post Online (as of March 2009), updated with feedback from mills called to verify contacts and comments submitted to EPA in response to the draft mill list published for public comment. Mills that only purchase pre-consumer paper or paperboard products and convert them into other products (i.e., converting operations) are not affected by this action. The North American Industry Classification System (NAICS) codes for respondents affected by the information collection include 32211 for pulp mills, 32212 for paper mills, and 32213 for paperboard mills.

(b) Information Collected

(i) Data Items. Each owner/operator of each affected mill will be required to complete an electronic survey that contains several components. Some survey components are not applicable for some types of mills. The draft electronic survey is a series of Microsoft Excel spreadsheet files, each of which is divided into a series of worksheets (“tabs” within the spreadsheet file). Table 1 below denotes which pulp and paper sector survey spreadsheet tabs are to be completed depending on the part of the survey and type of mill. Survey spreadsheet tabs for Parts I and III of the ICR must be completed for all mills that are major or synthetic area sources of HAP emissions and produce pulp, perform bleaching, or manufacture paper or paperboard products; survey spreadsheet tabs for Part II of the ICR must only be completed for mills that are major sources. Mills will also be asked to supply process flow diagrams for the following mill areas (as applicable): pulping process, chemical recovery area, wastewater treatment, and black liquor gasification (if used).

Table 1. Survey Spreadsheets and Tabs to Complete

Spreadsheet tab	Types of mills that should complete this spreadsheet tab	Estimated number of mills
P&P survey_PL.xls		
Mill	All mills	352
PI Equip detail	All mills	352
PI Permit limits	All mills	352
PI Controls	Mills with add-on air pollution controls on pulping emission units, bleaching emission units, or papermaking emission units.	352
Pulp prod	Mills that produce any type of pulp (including chemical, mechanical/groundwood, secondary fiber, including non-wood pulp)	151
Byproducts	Mills that produce turpentine or tall oil byproducts from pulping processes	98
Kraft condensates	Mills that perform kraft pulping	98
CCA	Mills that perform kraft pulping and use the clean condensate compliance alternative (CCA)	49 ¹
Bleaching	Mills that perform bleaching	93
Paper prod	Mills the produce paper or paperboard products	334
HAP additives	Mills the produce paper or paperboard products	334
WW	Mills with onsite wastewater treatment plants	352
PI Emissions test data	All mills	352
P&P NEI update.xls (or P&P NEI blank.xls)		
Facility (or New Facility)	All major source mills	352 ²
Inventory (or New Facility)	All major source mills	352 ²
P&P survey_PIII.xls		
PIII Equip detail	Mills that use chemical recovery combustion processes	112
PIII Permit limits	Mills that use chemical recovery combustion processes	112
PIII Controls	Mills with add-on air pollution controls on chemical recovery combustion processes.	112
PCC	Mills that route lime kiln, boiler, or other process exhaust to a precipitated calcium carbonate (PCC) plant	30
PIII Emissions test data	Mills that use chemical recovery combustion processes	112

1. Assumes that up to 50% of kraft mills use the CCA.
2. Overestimate; EPA will not know the number of synthetic area sources that are exempt from Part II until the Part I survey responses have been received.

In addition to the pulp and paper sector survey spreadsheets listed in Table 1, separate spreadsheets are provided for submittal of continuous emissions monitoring system (CEMS) and/or continuous opacity monitoring system (COMS) data, or optional control measure cost information. Separate versions of these spreadsheets are to be submitted under Parts I and III of the survey for the different emissions units covered under those parts.

Emissions data collected under the *Emissions test data* tabs listed in Table 1 or the CEMS spreadsheets mentioned above will allow EPA to characterize the performance of equipment and controls, reevaluate emissions limits, and consider variability. Emissions data (test reports or

CEMS data) are being requested for affected sources and emissions units for which emissions limits may be reevaluated under NSPS review or RTR. The pollutants for which emissions data are requested include particulate matter (PM), filterable PM less than 2.5 microns (PM_{2.5}), condensable PM_{2.5}, speciated HAP metals, chlorine (as a surrogate for chlorinated HAP), hydrochloric acid, methanol (as a surrogate for organic HAP), acetaldehyde, formaldehyde, total hydrocarbon (as carbon), dioxin/furan (CDD/CDF), polycyclic organic matter/polycyclic aromatic hydrocarbon (POM/PAH), total reduced sulfur (TRS), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and carbon monoxide (CO). Separate “tabs” of the CEMS spreadsheet are provided for the different pollutants for which CEMS are available.

The control cost spreadsheet requests information related to the capital and operating costs of selected air pollution controls or process/equipment changes. Submittal of the control cost information is optional. The Agency wishes to receive enough cost information on a voluntary basis to perform the CAA-required regulatory analyses. However, should additional cost information be needed, EPA reserves the right to follow up with mills that have installed equipment or implemented process changes of interest to request cost information under CAA section 114 authority.

Although a large amount of information is needed for regulatory reviews of the two NESHAP and NSPS, the EPA has designed the pulp and paper information collection in a way to minimize the burden associated with supplying and processing this information. The survey will collect information to supply multiple regulatory actions in order to minimize duplication and burden associated with multiple collections for the different rules. For mills with prior NEI data, the EPA will pre-populate the Part II spreadsheets with each mill’s 2005 NATA NEI data set to be reviewed (thereby reducing respondent burden to locate and import their mill’s NEI data). For mills with no prior NEI data, a blank spreadsheet containing the NEI data fields to be populated will be provided. The EPA has minimized the burden associated with providing these NEI updates by exempting synthetic area sources from this requirement; only major source mills would be required to provide NEI updates. The burden associated with the NEI updates has also been further reduced because updates to criteria air pollutant and inclusion of total reduced sulfur data in the NEI updates are optional. A lookup spreadsheet containing only the NEI codes included in the 2005 NEI data set will be provided, along with a simplified crosswalk of the pulp and paper source classification codes SCC codes in order to ensure that valid NEI codes are used

and to reduce respondent time associated with locating codes on the NEI website. The pulp and paper information collection is being administered in spreadsheet form (as opposed to data base software) because respondents are likely to be more familiar with spreadsheet use than with data bases, and (following QA) data from the Excel spreadsheet rows can be readily imported into Access data base software for use by the Agency (eliminating the time required for EPA to key-enter data). The pulp and paper survey spreadsheets can be provided to mills on a flash drive which respondents can use to save and submit their survey materials such as electronic copies of flow diagrams, emission test reports, and the survey spreadsheets. The burden associated with collection of emissions test data has been reduced in several ways:

- (1) Only existing emissions data (CEMS data or emissions test reports) are being requested at this time. Mills are not required to conduct any new emissions testing or to install or operate any new CEMS or COMS to respond to this survey.
- (2) Data are, for the most part, being requested for the HAP surrogates defined in the MACT standards, as opposed to speciated chlorinated HAP or speciated non-chlorinated organic HAP. Speciated data are being requested for acetaldehyde and formaldehyde (in addition to the methanol surrogate for organic HAP) because these pollutants are expected to be of interest for residual risk.
- (3) EPA has developed a matrix of emission units and pollutants for which test data are requested for the emissions units covered in Part I and Part II. Emissions data are only being requested for emissions unit and pollutant combinations for which emissions limits may be reevaluated under NSPS review or RTR (or for pollutant that may serve as an indicator or surrogate for emission unit or control system performance). The matrix provides cutoff dates for selected emission unit and pollutant combinations (or in some cases, only requests the most recent test data) in order to minimize respondent burden and to ensure the Agency's ability to process the data requested.
- (4) Respondents are required to submit emissions test reports in order for EPA (or EPA contractor personnel) familiar with extracting test data from test reports to enter the data in a manner that ensures consistent and reliable treatment of the data (e.g., with respect to data averaging, non-detects, etc).
- (5) Respondents may provide electronic or hard copy emissions test reports, whichever they find to be less burdensome.
- (6) The survey instructions allow respondents to provide CEMS data in an alternative format if they cannot fit it into the survey spreadsheet provided.
- (7) Mills required to complete Part III may postpone submittal of criteria air pollutant emissions test data and CEMS data required for the emission units listed in Part I Attachment 1 until the deadline for Part III.

The EPA has minimized the burden associated with providing permit limits by allowing submittal of the permit or summary of permit limits in an alternative format. The EPA is not requesting state mass-based limits. The survey instructions also include a table of suggested

permit limit units of measure that are of the most interest (based on the units of measure for Federal limits).

Finally, the EPA has minimized the collection of control measure cost information by focusing the collection of cost information on air pollution controls and process changes of particular interest for purposes of the NSPS review or RTR (as opposed to all control measures employed by pulp and paper mills). The EPA expects cost information obtained from the industry to be some of the most reliable and valid information available since the cost data would be specific to pulp and paper applications. In addition, collection of cost information from the industry (as opposed to a separate collection from other sources such as vendors) would accelerate EPA's ability to analyze the cost impacts of regulatory options.

(ii) *Respondent Activities.* The activities a respondent must undertake to fulfill the requirements of the information collection are presented in Attachment 2. These include: i) read instructions; ii) provide information on each affected source through electronic survey; and iii) submit hard or electronic copies of flow diagrams, previous emission test reports, and available CEMS or COMS data.

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

(a) Agency Activities

A list of activities required of the EPA is provided in Attachment 3. These include: i) develop electronic questionnaire and packages for mailout; ii) answer respondent questions (including claims of true area source status or that mill is not engaged in processes of interest); iii) review and analyze responses and emissions data; and iv) analyze requests for confidentiality.

(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use personal computers and applicable spreadsheet and database software. To better facilitate uniformity in the format of the requested data, and, thus, increase the ease of database entry, standardized survey questions, example responses, and Excel spreadsheet forms will be distributed to respondents. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal. Flow diagrams may be used to answer any questions revealed during quality assurance (QA) of each submittal. The EPA may place follow-up calls to mills should questions remain after reviewing all materials submitted. Following QA of each

submittal, the spreadsheet information from each mill will be uploaded into an Access data base for further analysis. Survey responses claimed as CBI will be housed in a separate data base from the non-CBI survey responses. In addition, a copy of the NEI updates submitted will be routed for inclusion in EPA's residual risk input data base, and for inclusion in future versions of the NEI and its successor, the Emissions Inventory System (EIS). Emissions test report data will be entered into a data base by EPA (or EPA contractor personnel) familiar with extracting test data from test reports. In addition CEMS data would be uploaded in a data base for analysis of emissions variability. The resulting data bases will be QA'd prior to and as part of regulatory analyses.

(c) Small Entity Flexibility

All respondents required to comply with the pulp and paper data gathering effort will be subject to the same requirements. EPA expects that a small percentage of the respondents may be small entities. Small entities are likely to be non-integrated mills with lower-capacity pulp and paper processes (e.g., smaller mills that produce paper from purchased pulp). Small entities and other mills that are not major or synthetic area sources of HAP emissions (i.e., true area sources) would not be required to complete the survey, provided that they submit documentation of their true area source status. Even if they are major or synthetic area sources of HAP emissions, small entities (and other non-integrated mills) would have fewer portions of the survey to complete, as their operations would likely be less extensive. In addition, synthetic area sources would not be required to complete Part II of the survey. Also, any individual small entity would be expected to receive only one CAA section 114 letter so their response burden will be minimized. The Agency also plans to use an electronic format of the questionnaire in order to reduce the burden and improve the data accuracy from all respondents, including small entities. In addition, the survey will contain a question to determine the small entity status of a facility. This question will help to identify, quantify, and minimize the burden on small entities during the revised rulemaking process.

(d) Collection Schedule

EPA anticipates issuing the CAA section 114 letters by February 2011. These CAA section 114 letters would require the owner/operator of each pulp and paper mill to complete Part I of the ICR within 30 days of receipt of the survey, Part II within 100 days, and Part III within 180 days. EPA will compile and analyze the survey response data upon receipt.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden and Costs

Attachment 2 presents estimated costs for the required data collection activities. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers and were taken from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by occupational and industry group," available at www.bls.gov/news.release/ecec.t02.htm. Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$46.76 per hour for technical, \$54.52 per hour for managerial, and \$23.11 per hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$98.20, management at \$114.49, and clerical at \$48.53. These estimates represent the one-time burden that will be incurred by the recipients.

(b) Estimating Agency Burden and Costs

The costs the Federal Government would incur are presented in Attachment 3. The Agency labor rates are from the Office of Personnel Management (OPM) 2009 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2010-GS, available on the OPM website at www.opm.gov/oca/10tables/html/gsh.asp. The government employee labor rates are \$16.28 per hour for clerical (GS-7, Step 1), \$34.34 for technical (GS-13, Step 1), and \$47.74 for managerial (GS-15, Step 1). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$26.05, technical at \$54.94, and managerial at \$76.38.

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

Estimates based on the Lockwood-Post Online (as of March 2009) and follow-up comments received indicate that the potential respondent universe consists of 352 mills. All 352 of these mills will be required to complete some portion of the electronic survey, with the exception of mills that provide documentation (a one-page form) to EPA within 20 days certifying that either: (1) they are not a major or synthetic area source of HAP emissions, (2) they were not operational in 2009 and remain closed, or (3) they do not produce pulp, perform bleaching, or manufacture paper or paperboard products. The government burden estimate

provided in Attachment 3 assumes that 15 percent of mills will provide documentation of true area source status, mill closure, or that pulping, bleaching, papermaking is not performed at the mill. However, it is not known how many of these claims will be valid so all mills are included in the burden estimate for respondents (in Attachment 2). Attachment 2 lists the various portions of the survey in detail and provides an estimated number of mills required to complete each portion of the survey. Specific counts of the different types of mills used in the burden estimates are provided in Part B of this supporting statement.

(d) Bottom Line Burden Hours and Costs Tables

(i) Respondent tally. The bottom line industry burden hours and costs, presented in Attachment 2, are calculated by summing the person-hours column and by summing the cost column. The total burden and cost to the industry for 352 respondents is 161,106 hours and \$15,238,347. No capital or annualized costs are applicable because this is a one-time submittal. O&M costs of \$6,336 are estimated for postage to mail in the three parts of the survey response to EPA.

(ii) Agency tally. The bottom line Agency burden and cost, presented in Attachment 3 is calculated in the same manner as the industry burden and cost. The estimated burden and cost for 352 respondents is 10,062 hours and \$625,071, which includes \$7,611 in O&M costs to send certified CAA section 114 letters to all respondents with electronic return receipt and a flash drive containing pre-populated spreadsheets, questionnaire printing costs, and computer storage of data received.

(iii) The complex collection. This ICR is a simple collection; therefore, this section does not apply.

(iv) Variations in the annual bottom line. This section does not apply as this is a one-time collection.

(e) Reasons for Change in Burden

This is the initial estimation of burden for this information collection; therefore, this section does not apply.

(f) Burden Statement

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This

includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

The total cost burden for the pulp and paper data gathering effort is estimated to be 161,106 hours and \$15,238,347 (458 hours and \$43,291 per respondent for 352 respondents). This ICR does not include any requirements that would cause the respondents to incur either capital or start-up costs. O&M costs of \$6,336 (\$18 per respondent) are estimated for postage to mail in the survey response to EPA.

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 docket for this ICR under Docket ID No. EPA-HQ-OAR-2007-0544, which is available for online viewing at www.regulations.gov, or in hard copy at EPA Docket, EPA/DC, EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8 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 Air and Radiation Docket Center is 202-566-1742.

An electronic version of the public docket is available at www.regulations.gov. This site can be used 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. When 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 EPA Docket ID No. EPA-HQ-OAR-2007-0544 in any correspondence.

**INFORMATION COLLECTION REQUEST FOR PULP AND PAPER SECTOR NEW
SOURCE PERFORMANCE STANDARDS (NSPS) AND NATIONAL EMISSION
STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) RESIDUAL RISK
AND TECHNOLOGY REVIEW (RTR)**

Part B of the Supporting Statement

1. Respondent Universe

Estimates based on the Lockwood-Post Online (as of March 2009) indicate that the potential respondent universe consists of 352 mills. All 352 of these mills will be required to complete some portion of the electronic survey, with the exception of mills that provide documentation to EPA certifying that either: (1) they are not a major source or synthetic area source of HAP emissions, (2) they were not operational in 2009 and remain closed, or (3) they do not produce pulp, perform bleaching, or manufacture paper or paperboard products. Any mill that meets one of these criteria will need to complete the one-page form in the survey overview document certifying their status and submit it to EPA within 20 days of receiving the ICR. The government burden estimate provided in Attachment 3 assumes that 15 percent of mills will provide documentation of true area source status, mill closure, or that pulping, bleaching, papermaking is not performed at the mill. However, it is not known how many of these claims will be valid, so all mills are included in the burden estimate for respondents (in Attachment 2). Similarly, it is also unknown how many mills are synthetic area sources exempt from the requirement to complete Part II of the survey, so all mills are included in the burden estimate for respondents for Part II (in Attachment 2). Attachment 2 lists the various portions of the survey in detail and provides an estimated number of mills required to complete each portion of the survey. Specific counts of the different types of mills used in the burden estimates are as follows:

Chemical pulp mills	<u>Count</u>
kraft (including kraft/mechanical)	89
soda	1
sulfite	5
kraft/semichemical	9
semichemical	8
	<hr/>
	112
Mechanical/groundwood, secondary fiber, and non-wood pulp mills	
mechanical	14
specialty (recycled)	22
nonwood	3
	<hr/>
	39
Paper/paperboard only + Integrated paper mills	334
Number of mills that perform bleaching	93
TOTAL NUMBER OF MILLS	352

2. Response Rates

Since the information will be requested pursuant to the authority of CAA section 114, EPA expects that all respondents requested to submit information will do so.

List of Attachments

1. Draft Questionnaire Content
2. Industry Burden and Costs for Responding to the Questionnaire
3. Agency Burden and Costs

Attachment 1.

Draft Questionnaire Content

The draft electronic questionnaire may be found in separate files accompanying this supporting statement, including the following:

File name	Description
<i>Phased Instructions Overview.doc</i>	This is the draft survey overview document. This file provides an overview of the sources covered under the pulp and paper sector survey, the sources exempt from the survey, the components and due dates of the three-part survey, and the base year for the survey. Attachments to this document are: (1) documentation of true area, non-operational, or non-applicable status; (2) NSPS and NESHAP definitions; (3) acronyms and abbreviations used in the survey materials; and (4) signed certification form.
Part I – Mill Overview and Subpart S Data	
<i>P&P survey instructions_PI.doc</i>	This file provides instructions for completing and submitting Part I of the survey (including CBI and non-CBI responses); the request for flow diagrams; the request for emission test data (emissions test reports or CEMS) for pulp and paper production units; and the request for optional control measure cost information for those units. Attachments to this document are: (1) a list of emission units to include in Part I of the survey response; (2) small business size standards; and (3) a table of pulp and paper production emission units and pollutants for which existing emission test data are requested.
<i>P&P survey_PI.xls</i>	This multi-tabbed spreadsheet file is the main portion of Part I of the survey. It includes a number of pulp and paper sector tabs with questions needed to specify and characterize pulp and paper production emission units and control systems. A listing of the tabs in this file is provided in Table 1 of the Part I survey instructions document described above.
<i>P&P CEMS_PI.xls</i>	The spreadsheet contains templates for submittal of CEMS or COMS data for pulp and paper production units (for mills that currently operate CEMS or COMS). Separate tabs are provided for pollutants such as TRS, NO _x , SO ₂ , CO, methanol, chlorine, and PM. An optional tab is included for CEMS cost information, and an example tab is provided.
<i>P&P costs OPTIONAL_PI.xls</i>	This file contains control device and process change cost questions for pulp and paper production emission units. These cost questions are optional.
<i>Boiler MACT Code Lookup.xls</i>	This file provides Boiler MACT Facility ID and Unit ID codes extracted from the Boiler MACT data base for NAICS 322 for the convenience of respondents wishing to supply these codes.
Part II – NEI Update	
<i>P&P NEI instructions.doc</i>	This file provides instructions for completing and submitting the NEI update in Part II of the survey. Attachments to this document are: (1) a list of emission units to include in the NEI update; (2) resources for estimating emissions; and (3) instructions for accessing the FTP site.
<i>P&P NEI update.xls</i>	This spreadsheet file includes the NEI update portion of Part II of the survey for mills with existing NEI data. It includes pre-populated <i>Facility</i> and <i>Inventory</i> tabs with additional specified columns for respondents to enter any revisions.
<i>P&P NEI blank.xls</i>	This spreadsheet file includes the NEI update portion of Part II of the survey for mills for which NEI data do not exist. It includes blank <i>New Facility</i> and <i>New Inventory</i> tabs with specified columns for respondents to enter the relevant information.
<i>Lookups for P&P survey.xls</i>	This spreadsheet contains lookup code tables needed to complete the NEI revisions. There are lookup tables for the pulp and paper source classification codes (SCC) codes grouped according to process, and for all SCC codes. Also included are lookup tables needed to review and/or revise the various NEI data fields that contain codes.

File name	Description
Part III – Chemical Recovery Combustion Sources	
<i>P&P survey instructions_PIII.doc</i>	This file provides instructions for completing and submitting Part III of the survey (including CBI and non-CBI responses); the request for emission test data (emissions test reports or CEMS) for chemical recovery combustion units; and the request for optional control measure cost information for those units. Attachments to this document are: (1) a list of emission units to include in Part III of the survey response; and (2) a table of chemical recovery combustion units and pollutants for which existing emissions test data are requested.
<i>P&P survey_PIII.xls</i>	This multi-tabbed spreadsheet file is the main portion of Part III of the survey. It includes a number of pulp and paper sector tabs with questions needed to specify and characterize chemical recovery combustion units and control systems. A listing of the tabs in this file is provided in Table 1 of the Part III survey instructions document described above.
<i>P&P CEMS_PIII.xls</i>	The spreadsheet contains templates for submittal of CEMS or COMS data for chemical recovery combustion units (for mills that currently operate CEMS or COMS). Separate tabs are provided for pollutants such as TRS, NO _x , SO ₂ , CO, methanol, chlorine, and PM. An optional tab is included for CEMS cost information, and an example tab is provided.
<i>P&P costs OPTIONAL_PIII.xls</i>	This file contains control device and process change cost questions for chemical recovery combustion units. These cost questions are optional.

Attachment 2.

Respondent Burden and Costs for the Information Collection

Respondent Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year ¹	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions	12	1	12	352	4224	211	422	\$459,460
B. Required Activities								
a. Part I: Mill Overview and Subpart S Data								
i. Submit flow diagrams	20	1	20	352	7040	352	704	\$765,767
ii. Complete and submit survey spreadsheet tabs, as follows:								
Mill (general information)	6	1	6	352	2,112	106	211	\$229,730
PI Equip detail	40	1	40	352	14,080	704	1,408	\$1,531,534
PI Permit limits	40	1	40	352	14,080	704	1,408	\$1,531,534
PI Controls	15	1	15	352	5,280	264	528	\$574,325
Pulp prod	6	1	6	151	906	45	91	\$98,549
Byproducts	4	1	4	98	392	20	39	\$42,639
Kraft condensates	8	1	8	98	784	39	78	\$85,279
CCA ²	8	1	8	49	392	20	39	\$42,639
Bleaching	6	1	6	93	558	28	56	\$60,696
Paper prod	6	1	6	334	2,004	100	200	\$217,982
HAP additives	20	1	20	334	6,680	334	668	\$726,608
WW	6	1	6	352	2,112	106	211	\$229,730
PI Emissions test data ³								
Reports for chemical pulping (4 reports)	1	4	4	112	448	22	45	\$48,731
Reports for non-chemical pulping, papermaking, and bleaching (1 report for each process)	1	1	1	466	466	23	47	\$50,689
iii. Gather and scan/copy emission test reports for submittal ^{3,4}								
Reports for chemical pulping (4 reports)	1.5	4	6	112	672	34	67	\$73,096
Reports for non-chemical pulping, papermaking, and bleaching (1 report for each process)	1.5	1	1.5	466	699	35	70	\$76,033
iv. Complete and submit Part I CEMS spreadsheet ⁵	10	1	10	112	1,120	56	112	\$121,827
v. Complete and submit Part I optional cost spreadsheet ⁶	10	1	10	88	880	44	88	\$95,721
vii. Complete signed certification form for part I	0.2	1	0.2	352	70	4	7	\$7,658
b. Part II: NEI Update ⁷								
i. Complete and submit survey spreadsheet tabs, as follows:								
Mills that previously updated their NEI for RTR	120	1	120	96	11,520	576	1,152	\$1,253,073
Mills that have not previously updated NEI for RTR	180	1	180	226	40,680	2,034	4,068	\$4,424,914

Respondent Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year ¹	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
Mills with no prior NEI data	280	1	280	30	8,400	420	840	\$913,699
ii. Complete signed certification form for part II	0.2	1	0.2	352	70	4	7	\$7,658
a. Part III: Chemical Recovery Combustion Sources								
i. Complete and submit survey spreadsheet tabs, as follows:								
PIII Equip detail	20	1	20	112	2,240	112	224	\$243,653
PIII Permit limits	20	1	20	112	2,240	112	224	\$243,653
PIII Controls	15	1	15	112	1,680	84	168	\$182,740
PCC	4	1	4	30	120	6	12	\$13,053
PIII Emissions test data ³	1	14	14	112	1,568	78	157	\$170,557
ii. Gather and scan/copy emission test reports for submittal ^{3,4}	1.5	14	21	112	2,352	118	235	\$255,836
iii. Complete and submit Part III CEMS spreadsheet ⁵	30	1	30	112	3,360	168	336	\$365,480
iv. Complete and submit Part III optional cost spreadsheet ⁶	30	1	30	28	840	42	84	\$91,370
v. Complete signed certification form for part III	0.2	1	0.2	112	22	1	2	\$2,437
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4B)								
E. Write Report (Not Applicable)								
5. RECORDKEEPING REQUIREMENTS (Not applicable)								
TOTAL ANNUAL LABOR BURDEN AND COST					140,092	7,005	14,009	\$15,238,347
					<i>total =</i> 161,106	<i>avg hr/respondent =</i> 458 ⁸		\$ 43,291
ANNUAL CAPITAL COSTS (Not Applicable)								\$ -
ANNUALIZED CAPITAL COSTS (Not Applicable)								\$ -
TOTAL ANNUAL COSTS (O&M) ⁹								\$ 6,336
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$ 6,336

- The number of respondents per year is based on the mill counts listed in Part B, Section 1 - Respondent Universe.
- Assumes that 50% of kraft mills use the clean condensate alternative (CCA).
- It is estimated that chemical pulp mills will submit 18 test reports each (4 in response to Part I and 14 in response to Part III), and that non-chemical pulp mills, bleach plants, and paper mills will each submit 1 test report.
- It is estimated that it would take 1.5 hours to locate and scan or copy each test report.
- Assumes that all chemical pulp mills will populate the CEMS spreadsheet with CEMS and/or COMS data. The majority of CEMS data are expected to be submitted for the emissions units covered under Part III.
- Assumes that 25% of mills will provide cost information.
- Synthetic area sources will not be required to complete Part II of the survey. However, EPA will not know the number of synthetic area sources that are exempt from Part II until the Part I survey responses have been received. Therefore, all mills are included in the burden estimate for respondents for Part II.
- The average number of labor hours per respondent (458) is equal to the total annual labor burden (161,106) divided by the total number of respondents (i.e., mills) (352).
- Postage Costs for mailing survey responses to EPA are estimated at \$6 for Federal Express letter size envelope flat rate (1 per respondent – i.e., 3 total).

Attachment 3.

Agency Burden and Costs

Agency Activity	(A) EPA Hours/Occurrence	(B) Occurrences/Respondent/Year	(C) EPA Hours/Respondent/Year (A x B)	(D) Respondents/Year ¹	(E) EPA Technical Hours/Year (C x D)	(F) EPA Managerial Hours/Year (E x 0.05)	(G) EPA Clerical Hours/Year (E x 0.10)	(H) Cost, \$
Develop/revise questionnaire spreadsheets and instructions	400	1	400	1	400	20	40	\$24,547
Develop survey webpage	10	1	10	1	10	1	1	\$614
Pre-populate mill spreadsheets with existing NEI data ²	1	1	1	322	322	16	32	\$19,760
Mail out questionnaire ³	0.7	1	0.7	352	246	12	25	\$15,121
Review claims that survey is not required to be completed due to area source status, mill closure, or because mill does not produce pulp, perform bleaching, or manufacture paper products ⁴	1	1	1	52.8	53	3	5	\$3,240
Answer respondent questions via phone, email, and/or frequently asked questions posted on webpage ⁵	1	1	1	88	88	4	9	\$5,400
Analyze requests for confidentiality ⁶	1	1	1	88	88	4	9	\$5,400
Review signed certification forms	0.1	1	0.1	352	35	2	4	\$2,160
Review and analyze responses (including follow-up)								
NEI data (from Part II) ⁷	4	1	4	352	1,408	70	141	\$86,406
Sector survey spreadsheet data (from Parts I and III)	8	1	8	352	2,816	141	282	\$172,812
CEMS data (from Parts I and III) ⁸	2	1	2	112	224	11	22	\$13,746
Optional cost data (from Parts I and III) ⁹	2	1	2	88	176	9	18	\$10,801
Print emissions test reports ¹⁰	0.1	2,482	248.2	1	248	12	25	\$15,232
Enter emissions test data from test reports								
Reports for chemical pulping (18 reports)								
Enter PM, chlorine, HCl, methanol, THC, NOx, SO2, CO	1	16	16	112	1,792	90	179	\$109,971
Enter speciated HAP metals, PM2.5 (filterable and condensable), CDD/CDF, speciated TRS, POM/PAH	2	2	4	112	448	22	45	\$27,493
Reports for non-chemical pulping, papermaking, and bleaching (1 report for each process)	1	1	1	466	466	23	47	\$28,597
Review/analyze emissions test data ¹¹	0.5	2,482	1,241	1	1,241	62	124	\$76,158
Total Annual Hours					10,062	503	1,006	\$617,460
						11,571	hours	
Expenses (O&M) ¹²								
Printing questionnaire								\$1,232
Flash drives								\$2,464
Postage								\$2,112
Computer storage of data								\$1,803
Total Expenses								\$7,611

TOTAL ANNUAL LABOR BURDEN AND COST									\$625,071
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1. The number of respondents per year is based on the mill counts listed in Part B, Section 1 - Respondent Universe.
2. The number of respondents per year excludes mills that are not already included in the NEI.
3. Mailout package includes section 114 letter with standard enclosures, hard copy of survey overview document, and flash drive containing spreadsheet files. Assumes EPA will mail one questionnaire per facility.
4. Assumes 15% of mills provide documentation of area source status, mill closure, or that pulping, bleaching, papermaking is not performed at the mill. It is not known how many of these claims will be valid so this number of mills has not been subtracted from the burden estimates associated with completing the survey.
5. Assumes that 25% of the facilities will have questions.
6. Assumes that 25% of facilities will have confidential data.
7. Synthetic area sources will not be required to complete Part II of the survey. However, EPA will not know the number of synthetic area sources that are exempt from Part II until the Part I survey responses have been received. Therefore, all mills are included in the burden estimate for respondents for Part II.
8. Assume all chemical pulp mills populate the CEMS spreadsheet with CEMS and/or COMS data.
9. Assume 25% of mills will provide cost information.
10. Assumes 18 test reports for chemical pulp mills (from Parts I and III), plus 1 test report each for non-chemical pulp mills, bleach plants, and paper mills.
11. Some emissions test results will require little time for analysis (e.g., those within the range of other test results), while others will require additional time (e.g., best performers). Expect to spend an average of 0.5 hr per test result.
12. Copy costs are estimated for 70 pages at \$0.05/page. Flash drives were quoted at \$7/each. Postage Costs are estimated at \$6 for Federal Express letter size envelope flat rate. Data storage estimated at \$21/GB/mo, assuming 25 MB per response for chemical pulp mills and 5 MB per re