

**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:

	<u>Count</u>
Chemical pulp mills	
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, SO ₂ , CO	1	16	16	112	1,792	90	179	\$109,971
Enter speciated HAP metals, PM _{2.5} (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

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