

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal),  
EPA ICR Number 1657.07, OMB Control Number 2060-0387

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Pulp and Paper Production were proposed on December 17, 1993, and promulgated on April 15, 1998. These regulations apply to facilities that produce pulp, paper, or paperboard by employing kraft, soda, sulfite, semi-chemical, or mechanical pulping processes using wood; or any process using secondary or non-wood fiber and that emits 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. Affected sources are all the hazardous air pollutant (HAP) emission points or the HAP emission points in the pulping and bleaching system for mechanical pulping processes using wood and any process using secondary or non-wood fiber. This information is being collected to assure compliance with 40 CFR part 63, subpart S.

In general, NESHAP reports require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file onsite for at least two years following the date of such measurements, maintenance report, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

Approximately 115 sources are currently subject to the standard which includes: 111 chemical pulp mills, and 4 non-integrated paper mills that bleach with chlorinated compounds. It is assumed further that no additional new sources will become subject to the regulation in the next three years, though approximately 15 percent of the affected facilities will rebuild one or more process units in any given year.

In the United States, there are approximately 115 pulp and paper production facilities which are owned and operated by the pulp and paper industry. None of the 115 facilities in the

United States are owned by state, local, tribal or the Federal government. They are owned and operated by privately-owned, for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S).

In the development of the ICR, we addressed the Office of Management and Budget (OMB) “Terms of Clearance (TOC)” on the active ICR. The TOC are as follows:

When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA addressed each item of concern in the TOC. The respondent burden, universe, labor rates, and capital cost have been thoroughly checked and all estimates updated.

## **2. Need for and Use of the Collection**

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

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from pulp and paper plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. These HAP emissions are acetaldehyde, benzene carbon disulfide, chloroform, formaldehyde, methanol, methyl- ethyl-ketone, toluene, and xylene emissions. Therefore, the NESHAP for this source category was promulgated at 40 CFR part 63, subpart S.

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

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart S.

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

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

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

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The

primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted both the American Forest and Paper Association (AF&PA) at (202) 463-2588 and the National Paper Trade Association (NPTA) at (312) 321-4092.

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

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

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### 3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are pulp and paper production facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to The North American Industry Classification System (NAICS) codes, are listed below for source category description.

Standard (40 CFR Part 63, Subpart S)	SIC Codes	NAICS Codes
Pulp Mills	2611	32211
Paper Mills	2621	32212
Paperboard Mills	2631	32213

### 4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

#### (i) Data Items

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants for Pulp and Paper Production (40 CFR Part 63, Subpart S).

A source must make the following reports:

Notification Reports	
Notification of construction and reconstruction	63.5(d)
Construction or modification application	63.455(d)
Initial notification	63.9(b)(2)
Anticipated startup	63.9(b)
Actual startup	63.9(b)(4)(v)
Initial performance test results	63.10(d)(2)
Initial performance test	63.7(b), 63.9(e)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)

<b>Notification Reports</b>	
Compliance status	63.9(h)
Physical or operational change	63.5 (b)(4)
Opacity or visible emissions	N/A
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(I)

<b>Reports</b>	
Source status report	63.10(e)(3)
Semiannual Control Strategy Update (thru 2006)	63.455(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)
Emission test results and other data needed to determine emissions	63.454(a)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.10(3)(c)
Records are required to be retained for five years. Records must be kept onsite for the first two years. For the remaining three years, records can be kept in a readily accessible off-site location.	63.454
Site specific inspection plans	63.454(b)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

<b>Respondent Activities</b>
Read instructions.

<b>Respondent Activities</b>
<p>Install, calibrate, maintain, and operate continuous monitoring systems (CMS) for each of the following affected units:</p> <p>1.1 Non-Sulfite pulping process choice of:</p> <ol style="list-style-type: none"> <li>a. Provide documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or</li> <li>b. Provide documentation that the control incinerator is operating at a minimum level of 1600F and 0.75 second residence time, or</li> <li>c. Performance test of control device using Method 308.</li> </ol>
<p>1.2 Sulfite pulping process – performance test of control device using test method 308.</p> <p>2.1 Bleaching process vent scrubber (MACT I Mills) choice of:</p> <ol style="list-style-type: none"> <li>a. Provide documentation of scrubber operating parameters or previous performance test results, or</li> <li>b. Performance test of scrubber or control device using test Method 26A.</li> </ol> <p>2.2 Bleaching process vent scrubber (MACT III Mills) choice of:</p> <ol style="list-style-type: none"> <li>a. Provide documentation of scrubber operating parameters, or previous performance test results, or</li> <li>b. Performance test of scrubber or control device using test Method 26A.</li> </ol> <p>3.1 Non-Sulfite pulping wastewater treatment</p> <ol style="list-style-type: none"> <li>a. Performance test of condensate segregation and control device using method 305 or</li> <li>b. Performance test of bio-treatment unit using test Method 304.</li> </ol> <p>3.2 Sulfite pulping process</p> <ol style="list-style-type: none"> <li>a. Performance test of control device using test Method 305.</li> </ol>
<p>Perform initial performance test, Reference Method 26A, 304, 305, and 308 test, and repeat performance tests if necessary.</p>
<p>Conduct initial and annual inspection of enclosures, closed vent, and wastewater conveyance systems using test Method 21.</p>
<p>Write the notification and reports for: initial notification; compliance status; initial compliance strategy report; compliance strategy report update; semiannual summary report; continuous monitoring/exceedance reports; notifications of performance tests, construction/reconstruction, and actual startup.</p>
<p>Enter information required to be recorded for continuous monitoring for operating parameters, periodic inspections (monthly visual and annual Method 21) startups, shutdowns and malfunctions, personnel training and time for audits.</p>
<p>Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.</p>
<p>Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.</p>
<p>Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.</p>

<b>Respondent Activities</b>
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

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

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

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

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

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA-delegated authorities can edit, store, retrieve, and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.



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

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

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

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 35,358 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

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

This ICR uses the following labor rates:

Managerial	\$118.92 (\$56.63 + 110%)
Technical	\$97.78 (\$46.56 + 110%)
Clerical	\$48.76 (\$23.22 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2010, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are

from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

Since this rule does not require any continuous emission monitoring or electronic data submittal, total capital costs are zero. Continuous monitoring requirements are for parametric monitoring, and these systems are already in place; therefore, no new equipment would be required by the recordkeeping and reporting requirements. It is assumed that all mills will contract a testing company to provide sampling and analytical services for air and water tests.

Based on EPA's experience the testing methods required for this rule, the purchase of service for each method is estimated as follows:

Method 308 - \$14,000  
 Method 26A - \$10,000  
 Method 304 - \$11,000  
 Method 305 - \$16,000  
 Method 21 - \$3,000

These estimates include labor, materials, and analytical costs. For the entire industry, the number of mills assumed to contract testing companies annually for demonstrating compliance and the associated cost are estimated as follows:

Method 308 - 0	Tests x \$14,000 = \$0
Method 26A - 0	Tests x \$10,000 = \$0
Method 304 - 4.3	Tests x \$11,000 = \$ 47,300
Method 305 - 6.45	Tests x \$16,000 = \$103,200
Method 21 - 74	Tests x \$ 3,000 = <u>\$222,000</u>
	TOTAL <u>\$372,500</u>

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$372,500.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such as: the

examination of records maintained by the respondents; periodic inspection of sources of emissions; and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$43,014.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM) “2011 General Schedule” which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 115 respondents will be subject to the standard. It is estimated that no additional new sources will become subject to the rule. The overall average number of respondents, as shown in the table below is 115 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	17	115	0	17	115
2	17	115	0	17	115
3	17	115	0	17	115
Average	17	115	0	17	115

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 115.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Semiannual report	115	2	N/A	230
Exceedance report	17	2	N/A	34
Compliance strategy report update	0	1	N/A	0
Notification of performance test	19	1	N/A	19
Notification of construction/reconstruction	17	1	N/A	17
Notification of actual startup	17	1	N/A	17
			Total	317

The number of Total Annual Responses is 317.

The total annual labor costs are \$3,339,077. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

#### **6(e) Bottom Line Burden Hours Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

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

The total annual labor hours are 35,358. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 111 hours per response.

The total annual capital/startup and operation and maintenance (O&M) costs to the regulated entity are \$372,500.

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

The average annual Agency burden and cost over next three years is estimated to be 954 labor hours at a cost of \$43,014. See below Table 2: Average Annual EPA Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

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

The adjustment decrease in burden from the most recently approved ICR is due to a more accurate estimate of existing and anticipated new sources. After consulting with the Office of Air Quality Planning and Standards (OAQPS) and trade associations, and based on a recently completed research conducted by EPA, our data indicates that there are approximately 115 sources subject to the rule, as compared with the active ICR that shows 137 sources. There are no new facilities expected to be constructed over the next three years of this ICR. The decline in the number of sources is mainly due to plant closures. The industry is undergoing widespread consolidation and corporate restructuring. However, there is an increase in cost per labor hours due to the updated labor rates.

Because there are no new sources with reporting requirements, no capital/startup costs are incurred. The only cost that is incurred is for the operation and maintenance (O&M) of the monitoring equipment.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 111 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2011-0208. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the

telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0208 and OMB Control Number 2060-0387 in any correspondence.

**Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions								
1) MACT I Mills <sup>c, d, e</sup>	40	1	40	6	240	12	24	\$26,064.48
2) MACT III Mills <sup>c, d, e</sup>	20	1	20	0	0	0	0	\$0
B. Required activities								
1.1) Pulping processes (non-sulfite)								
a) Provide documentation that the vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or <sup>f</sup>	24	1	24	5	120	6	12	\$13,032.24
b) Provide documentation that the control incinerator is operating at a minimum level of 1600F and 0.75 sec residence time, or <sup>g</sup>	60	1	60	0	0	0	0	\$0
c) Performance test of control device - test Method 308 <sup>h</sup>	24	1	24	0	0	0	0	\$0
1.2) Pulping processes (sulfite)								
- Performance test of control device - test Method 308 <sup>h</sup>	24	1	24	0	0	0	0	\$0
2.1) Bleaching process vent scrubber (MACT I Mills) - choice of								
a) Provide documentation of scrubber operating parameters, or previous performance test results, or <sup>k</sup>	60	1	60	3	180	9	18	\$19,548.36
b) Performance test of scrubber or control device - test Method 26A <sup>h, k</sup>	24	1	24	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
3.1) Pulping wastewater treatment (non-sulfite)								
a) Performance test of condensate segregation and control device (test Method 305), or <sup>i, l</sup>	24	1	24	3	72	3.6	7.2	\$7,819.34
b) Performance test of bio-treatment unit - test Method 304 <sup>i, j, m</sup>	24	1	24	2	48	2.4	4.8	\$5,212.90
3.2) Pulping wastewater treatment (sulfite)								
Performance test control device - test Method 305 <sup>i, n</sup>	24	1	24	0	0	0	0	\$0
Repeat of performance test								
1) Test Method 308 – pulping <sup>h, o</sup>	24	1	24	0	0	0	0	\$0
2) Test Method 26A – bleaching <sup>h, o</sup>	24	1	24	0	0	0	0	\$0
3) Test Method 305 - kraft pulping wastewater <sup>i, o</sup>	24	1	24	3.45	82.8	4.14	8.28	\$8,992.24
4) Test Method 304 - kraft pulping wastewater <sup>i, j, o</sup>	24	1	24	2.3	55.2	2.76	5.52	\$5,994.83
5) Test Method 305 - sulfite pulping wastewater <sup>i, o</sup>	24	1	24	0	0	0	0	\$0
Initial/annual inspection (enclosures, closed vent, wastewater conveyance system) – test Method 21 <sup>p</sup>	8	1	8	74	592	29.6	59.2	\$64,292.38
Monthly visual inspection of enclosures, closed vent system, and wastewater conveyance system <sup>q</sup>	4	12	48	111	5,328	266.4	532.8	\$578,631.4 6
C. Create information	See 3B							
D. Gather information	See 3B							
E. Report preparation								
Initial notification report	16	1	16	0	0	0	0	\$0
Notification of compliance status	16	1	16	0	0	0	0	\$0
Initial compliance strategy report <sup>r</sup>	40	1	40	0	0	0	0	\$0
Compliance strategy report update <sup>r</sup>	16	1	16	0	0	0	0	\$0
Semiannual summary report <sup>s</sup>	16	2	32	115	3,680	184	368	\$399,655.3 6
Continuous monitoring/exceedance reports <sup>t</sup>	24	2	48	17	816	40.8	81.6	\$88,619.24
Notification of performance test <sup>u</sup>	4	1	4	19	76	3.8	7.6	\$8,253.76



Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
Notification of construction/reconstruction <sup>v</sup>	4	1	4	17	68	3.4	6.8	\$7,384.94
Notification of actual startup <sup>v</sup>	4	1	4	17	68	3.4	6.8	\$7,384.94
Subtotal for Reporting Requirements						13,139.9		
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3B							
D. Develop record system	40	1	40	0	0	0	0	\$0
E. Record information								
Records of continuous monitoring for operating parameters <sup>w</sup>	2	52	104	115	11,960	598	1,196	\$1,298,880.36
Records of periodic inspections (monthly visual inspections and annual method 21)	See 3B							
Record startup, shutdown, and malfunction <sup>x</sup>	4	12	48	115	5,520	276	552	\$599,483.04
F. Time to train personnel	N/A							
G. Time for audits <sup>y</sup>	8	2	16	115	1,840	92	184	\$199,827.68
Subtotal for Recordkeeping Requirements						22,218		
Subtotals Labor Burden and cost					30,746	1,537.3	3,074.6	\$3,339,077.55
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						35,357.9 35,358 (rounded)		\$3,339,077

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be 115. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$118.92 per hour for Executive, Administrative, and Managerial labor; \$97.78 per hour for Technical labor, and \$48.76 per hour

for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2010, Table 2. Civilian Workers, by Occupational and Industry groups. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

- <sup>c</sup> We have assumed that MACT I mills include pulping systems at kraft, sulfite, soda, and semi-chemical operations; and that MACT III mills include mechanical, non-wood, and secondary fiber operations, along with paper making at all types of mills that are major sources are subject to subpart S.
- <sup>d</sup> We have assumed that this is a one-time-only activity. After the initial compliance date, 5 percent of mills will be affected as a result of unexpected exceedances.
- <sup>e</sup> We have assumed that this is performed by all major source mills. There are 111 major MACT I category mills, and 60 major stand-alone (MACT III) category mills. We

assume that all MACT I category mills will be affected by this rule, and that the only MACT III category mills to be affected by this rule are the stand-alone mills with chlorine bleaching compounds (4 mills). The total number of mills affected by this rule is 115 ( $111 + 4 = 115$ ).

<sup>f</sup> We have assumed that 5 percent of non-sulfite pulping mills respondents will provide documentation. It is estimated that 85 percent of mills will use a recovery boiler, power boiler, or lime kiln for control of pulping vents. There are 106 non-sulfite pulping mills ( $85\% \text{ of } 106 = 90 \times 5\% = 5$ ).

<sup>g</sup> We have estimated that 15 percent of mills will use incineration for pulping lines [assuming half of these provide acceptable design specs (8), and half conduct performance tests (8)].

<sup>h</sup> We have assumed that it will take 24 hours once per year to complete the performance test of a control device, which includes the test plan, the test report, and the parametric monitoring setup. Method 308 tests for pulping lines and Method 26A tests for bleaching lines do not incur compliance testing costs.

<sup>i</sup> This estimate includes the test plan, the test report, and the parametric monitoring setup. Method 304 and 305 for pulping wastewater streams incur compliance testing costs.

<sup>j</sup> We assume that it will take each sulfite pulping mill respondent 24 hours once per year to conduct performance tests.

<sup>k</sup> We have estimated that MACT I and MACT III category mills have bleaching lines that use chlorinated compounds. We assume that 90 percent provide acceptable performance specs or previous test results, and 10 percent will conduct performance tests.

<sup>l</sup> We assume that each kraft mill has one pulping wastewater control device, with 60 percent of mills using stream strippers ( $60\% \times 97 = 58$ ) and ( $5\% \times 58 = 3$ ). See footnote "c." Facilities with steam strippers are assumed to perform initial condensate segregation and performance tests.

<sup>m</sup> We have assumed that 40 percent of kraft mills use biotreatment ( $40\% \times 97 = 39$ ) and ( $5\% \times 39 = 2$ ). Facilities with biotreatment control will perform initial performance tests.

<sup>n</sup> We have assumed that sulfite mills will monitor gas scrubber parameters and use Water-9 Model for emission estimates.

<sup>o</sup> We have assumed that 15 percent of performance test would have to be repeated because of failure.

<sup>p</sup> We have assumed that 2/3 of all MACT I mills that have positive pressure points in their vent systems will have to test using Method 21 ( $2/3 \times 111 = 74$ ). Method 21 for the wastewater conveyance system incurs compliance testing costs.

<sup>q</sup> We have assumed that each respondent will take 4 hours once per month to complete the monthly visual inspection. This monthly inspection of enclosures will be performed by MACT I category mills which will be affected by this rule.

<sup>r</sup> We have assumed that the requirements for either the initial or the updated compliance strategy report are now considered obsolete. These were required before 2006 only.

<sup>s</sup> We have assumed that each respondent will each take 16 hours twice per year to prepare the semiannual summary report.

<sup>t</sup> We have assumed that 15 percent of all affected mills during any one quarter will be required to submit an exceedance report in addition to the summary report ( $15\% \times 115 = 17$ ).

<sup>u</sup> We have assumed affected respondents must notify EPA of all tests including repeat performance tests ( $111 \times 0.05 = 5.6$ ) and ( $5.6 \times 1.15 \times 3 = 19$ ).

<sup>v</sup> We have assumed that 15 percent of mills will conduct reconstruction per year ( $15\% \text{ of } 115 = 17$ ).

<sup>w</sup> We have assumed that each respondent will take 2 hours 52 times per year to record continuous monitoring for operating parameters.

<sup>x</sup> We have assumed that each respondent will take 4 hours once per monthly to record startups, shutdowns, and malfunctions.

<sup>y</sup> We have assumed that each respondent will take 8 hours twice per year to train personnel.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions <sup>c</sup>	6	1	6	6	36	1.8	3.6	\$1,865.69
B. Required activities								
Initial performance tests : <sup>c</sup>								
1.1) Pulping processes (non-sulfite) – choice of:								
a) Review documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or <sup>d</sup>	8	1	8	5	40	2	4	\$2,072.98
b) Review documentation that the control incinerator is operating at a level of at least 1600 F and 0.75 sec residence time, or <sup>e</sup>	8	1	8	0	0	0	0	\$0
c) Review performance test of control device <sup>e</sup>	8	1	8	0	0	0	0	\$0
1.2) Pulping processes (sulfite) <sup>c</sup>								
- Review performance test of control device <sup>f</sup>	8	1	8	0	0	0	0	\$0
2.1) Bleaching process vent scrubber (MACT I Mills) – choice of: <sup>c</sup>								
a) Review documentation of scrubber operating parameters, or <sup>g</sup>	8	1	8	3	24	1.2	2.4	\$1,243.78

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
b) Review performance test of control device <sub>h</sub>	8	1	8	0	0	0	0	\$0
3.1) Pulping wastewater treatment system (non-sulfite) – choice of: <sup>c</sup>								
a) Review performance test of condensate segregation and control device, or <sup>g</sup>	8	1	8	3	24	1.2	2.4	\$1,243.78
b) Review performance test of bio-treatment unit <sup>g</sup>	8	1	8	2	16	0.8	1.6	\$829.20
3.2) Pulping wastewater treatment (sulfite) <sup>c</sup>								
- Review performance test of control device <sup>g,i</sup>	8	1	8	0	0	0	0	\$0
Review repeat performance tests <sup>c,j</sup>								
1) Test Method 308 – pulping	4	1	4	0	0	0	0	\$0
2) Test Method 26A – bleaching	4	1	4	3	12	0.6	1.2	\$621.89
3) Test Method 305 – kraft pulping wastewater	4	1	4	3	12	0.6	1.2	\$621.89
4) Test Method 304 – kraft pulping wastewater	4	1	4	2	8	0.4	0.8	\$414.60
5) Test Method 305 – sulfite pulping wastewater	4	1	4	1	4	0.2	0.4	\$207.29
Initial/annual inspection (enclosures, closed vent wastewater conveyance system) – Test Method 21 <sup>k</sup>	4	1	4	0	0	0	0	\$0
Monthly visual inspection of enclosures, closed vent system, and wastewater conveyance system <sup>l</sup>	4	1	4	0	0	0	0	\$0
C. Create information	N/A							
D. Gather information	N/A							
E. Report preparation								
Review initial notification report <sup>c,l</sup>	4	1	4	0	0	0	0	\$0
Review notification of compliance status <sup>c,l</sup>	4	1	4	0	0	0	0	\$0
Review initial compliance strategy report <sup>c,m</sup>	4	1	4	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year <sup>b</sup>
<sup>m</sup> Review compliance strategy report update <sup>c</sup>	4	1	4	0	0	0	0	\$0
Review semiannual summary report <sup>n</sup>	1	2	2	115	230	11.5	23	\$11,919.63
Review continuous monitoring/exceedance reports <sup>o</sup>	8	1	8	17	136	6.8	13.6	\$7,048.14
Review notification of performance test <sup>c,p</sup>	8	1	8	19	152	7.6	15.2	\$7,877.32
Review notification of construction/reconstruction <sup>c,q</sup>	4	1	4	17	68	3.4	6.8	\$3,524.07
Review notification of actual startup <sup>c,r</sup>	4	1	4	17	68	3.4	6.8	\$3,524.07
4. Recordkeeping requirements								
a. Read instructions	N/A							
b. Plan activities	N/A							
c. Implement activities	N/A							
d. Develop record system	4	1	4	0	0	0	0	\$0
e. Record information								
Records of monitoring parameters	4	1	4	0	0	0	0	\$0
Records of periodic inspection (monthly visual inspections and annual Method 21)	4	1	4	0	0	0	0	\$0
Record startups, shutdowns, and malfunctions	4	1	4	0	0	0	0	\$0
f. Personnel training	4	1	4	0	0	0	0	\$0
g. Time for audits	4	1	4	0	0	0	0	\$0
Subtotals Labor Burden and Cost					830	41.5	83	\$43,014.33
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						954.5 954 (rounded)		\$43,014

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing sources subject to the rule will be 115. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2011 General Schedule which excludes locality rates of pay.

- <sup>c</sup> We have assumed that this is a one-time only activity. After the initial compliance date, 5 percent of mills will be affected as a result of unexpected exceedances.
- <sup>d</sup> We have assumed that 5 percent of non-sulfite pulping mills respondents will provide documentation. It is estimated that 85 percent of mills will use a recovery boiler, power boiler, or lime kiln for control of pulping vents. There are 106 non-sulfite pulping mills ( $85\% \text{ of } 106 = 90 \times 5\% = 5$ ).
- <sup>e</sup> We assumed that 15 percent of mills use incineration for pulping lines (assuming half of these provide acceptable design specs (8), and half conduct performance tests (8)).
- <sup>f</sup> We have assumed that all of the 8 sulfite pulping mills will conduct performance tests.
- <sup>g</sup> We have assumed that each kraft mill has one pulping wastewater control device, with 60 percent of mills using stream strippers (60% of 97 = 58). Facilities installing new biotreatment control will perform initial performance tests.
- <sup>h</sup> We have assumed that 69 MACT I and 4 MACT III category mills have bleaching lines that use chlorinated compounds. We assume 90 percent provide acceptable performance specs or previous test results, and 10 percent conduct performance test for a total of 7 ( $0.9 \times 69 + 4 = 66 \times 10\% = 7$ ).
- <sup>i</sup> We have assumed that 40 percent of kraft mills use biotreatment (40 % of 97 = 39).
- <sup>j</sup> We have assumed that 15 percent of performance tests would have to be repeated because of failure.
- <sup>k</sup> We have assumed that 2/3 of all MACT I mills have positive pressure points in their vent systems. All affected mills are required to perform initial and annual activity. EPA is notified of testing each year.
- <sup>l</sup> We have assumed that this task will be performed by all affected mills.
- <sup>m</sup> We have assumed that the requirements for either initial or updated compliance strategy reports are now considered obsolete. These were required before 2006 only.
- <sup>n</sup> We have assumed that each respondent will take 1hour to review the semiannual summary report.
- <sup>o</sup> We have assumed that 15 percent of all mills during any one quarter will be required to submit an exceedance report in addition to the summary report ( 15% of 115 = 17).
- <sup>p</sup> We have assumed affected respondents must notify EPA of all tests including repeat performance tests ( $111 \times 0.05 = 5.6$ ) and ( $5.6 \times 1.15 \times 3 = 19$ ).
- <sup>q</sup> We have assumed that 15 percent of mills will conduct construction or reconstruction per year (15% of 115 = 17).
- <sup>r</sup> We have assumed that affected respondent will take 4 hours to review notification of actual startup report.