

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal), EPA ICR Number 1805.06, OMB Control Number 2060-0377

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR part 63, subpart MM) were proposed on April 15, 1998, and promulgated on January 12, 2001. These regulations apply to existing and new chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills where the total hazardous air pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP; or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of the proposal. This information is being collected to ensure compliance with 40 CFR part 63, subpart MM.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. In addition, owners or operators are 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 standards.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency regional office.

Approximately 111 sources are currently subject to the standard. There are 89 kraft mills, 9 kraft and semichemical mills, 1 kraft and sulfite mill, 7 stand-alone semichemical mills, 4 sulfite mills, and 1 soda mill. It is estimated that no additional sources will become subject to the regulation; however, one of the existing facilities will be engaged in a modification each year over the three-year period of this rule.

There are approximately 111 chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills in the United States. None of the 111 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 different burdens to the “Affected Public” listed below, respectively, in Table 1a: One-Time Annual Respondent Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal) and Table 1b: Recurrent Annual Respondent Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal). The Federal government burden does not include work performed by Federal employees. This particular burden refers only to work performed for the Federal government by contractors, which can be found listed below in Table 2: Average Annual EPA Burden - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

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 has 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, acetaldehyde, benzene formaldehyde, hydrochloric acid (HCl), methanol, methyl ethyl ketone, and toluene hazardous air pollutant (HAP) emissions from chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mill cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart MM.

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 MM.

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) 463-2700, and the America Wood Council, at (202) 463-2766.

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 chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills. 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 MM)	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 Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM).

A source must make the following reports:

Notification Reports	
Initial notifications, reports of startups, shutdowns, malfunctions, construction/reconstruction, and modification	63.5, 63.9(b), 63.10(d)(5), 63.867(a)
Notification and report of performance test and results	63.7(b), 63.9(e), 63.10(d)(2), 63.867(a)

Notification Reports	
Notification of initial continuous monitoring system (CMS)/ continuous opacity monitoring system (COMS) demonstration	63.9(g), 63.867(a)
Notification and report of compliance status	63.9(h), 63.867(b)(1)-(2)
Reporting results of CMS/COMS demonstration	63.10(e)(2), 63.867(a)
Excess emissions reports (quarterly and semiannual)	63.10(e)(3), 63.867(c)
Certification that a non-direct contact evaporator (NDCE) recovery furnace equipped with a dry electrostatic precipitation (ESP) system is used to comply with a gaseous organic HAP standard in 63.862(c)(1)	63.866(c)(6)

A source must keep the following records:

Recordkeeping	
Five years retention of records	63.10(b)(1)
Startup, shutdown, and malfunction plan	63.6(e)(3), 63.866(a)
Records of startup, shutdown, and malfunction	63.6(e)(3)(iii)-(iv), 63.10(b)(2)(i)-(v)
Records of performance tests	63.10(b)(2)(viii)
Documentation supporting initial notifications and notification of compliance status	63.10(b)(2)(xiv)
Records of exceedances requiring corrective action and violations	63.866(b)
Black liquor solids firing rates for all recovery furnaces and semichemical combustion units	63.866(c)(1)
Lime production rates for all lime kilns	63.866(c)(2)
All parameter monitoring data required in section 63.864	63.866(c)(3)
Supporting calculations for compliance determinations made under section 63.865(a) through (e)	63.866(c)(4)
Compliant monitoring parameter ranges established for each affected source	63.866(c)(5)
Certification that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in section 63.862(1)	63.866(c)(6)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must continue to 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.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 25A, 29, or 308 as applicable, and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.

Agency Activities
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 both Table 1a: One-Time Annual Respondent Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal), and in Table 1b: Recurrent Annual Respondent Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1a and 1b 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 126,207 (Total Labor Hours summarized from Tables 1a, and 1b). 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device ¹	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
COMS	\$41,000	0	\$0	\$8,000	89	\$712,000
CPMS	\$0	0	\$0	\$0	0	\$0
Total	\$41,000	0	\$0	\$8,000	89	\$712,000

¹ No costs are included for continuous opacity monitoring system (COMS) installed for recovery furnaces or for continuous parameter monitoring systems (CPMS) because the monitoring equipment is already required for compliance with the NSPS for Kraft Pulp Mills (40 CFR Subpart BB).

The total capital/startup costs for this ICR is \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) cost is \$712,000 for photocopying, and postage. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$712,000.

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 \$17,585.

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 - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills (40 CFR Part 63, Subpart MM) (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

111 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 111 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	111	0	1	111
2	1	111	0	1	111
3	1	111	0	1	111
Average	1	111	0	1	111

¹ The new respondent includes 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 111.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of applicability of standards	1	1	0	1
Notification of initial performance test	1	1	0	1
Notification of performance evaluation	1	1	0	1
Notification of compliance status	1	1	0	1
Quarterly report of monitoring exceedances and periods of noncompliance	6	4	0	24
Semiannual report of no exceedances	105	2	0	210
			Total	240

The number of Total Annual Responses is 240.

The total annual labor costs are \$11,918,524. Details regarding these estimates may be found below in the summary for Tables 1a and 1b: Total Annual Respondent Burden and Cost

- NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

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

On an individual basis, the detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1a, 1b, and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$11,918,524. Details regarding these estimates may be found below in both Table 1a: One-Time Annual Respondent Burden and Cost: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal) and Table 1b: Recurrent Annual Respondent Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 526 hours per response.

The total annual capital/startup and operation and maintenance (O&M) costs to the regulated entity are \$712,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 476 labor hours at a cost of \$17,585. See below Table 2: Average Annual EPA Burden and Cost - NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

6(f) Reasons for Change in Burden

The adjusted decrease in burden from the most recently approved ICR is due to a more accurate estimate of existing and anticipated new sources. After consulting the Office of Air Quality Planning and Standards (OAQPS) and trade associations, our data indicates that there are approximately 111 sources subject to the rule, as compared with the active ICR that shows 130 sources. No new facilities are expected to be constructed over the next three years of this ICR. The decline in the number of sources is due mainly to plant closures. This 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 526 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-2011-0209. 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-2011-0209 and OMB Control Number 2060-0377 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 1a: One-Time Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	2	1	2	1	2	0.1	0.2	\$217.20
B. Required activities	See 3E							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write Report								
Notification of construction/reconstruction ^{c, d}	2	1	2	1	2	0.1	0.2	\$217.20
Notification of actual startup ^{c, d}	2	1	2	1	2	0.1	0.2	\$217.20
Notification of applicability of standard ^{c, d}	2	1	2	1	2	0.1	0.2	\$217.20
Notification of initial performance test ^{c, d}	2	1	2	1	2	0.1	0.2	\$217.20
Notification of performance evaluation ^{c, d}	2	1	2	1	2	0.1	0.2	\$217.20
Notification of compliance status ^{c, e}	80	1	80	1	80	4	8	\$8,688.16
Subtotal for Reporting Requirements						105.8		
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 4D							
C. Implement Activities	See 4D							
D. Develop record system ^{c, f}	40	1	40	1	40	2	4	\$4,344.08
E. Develop startup, shutdown, and malfunction plans ^{c, g}	100	1	100	1	100	5	10	\$10,860.20
F. Time to enter information								
- Records and documentation of supporting calculations for compliance determinations ^{c, h}	8	1	8	1	8	0.4	0.8	\$868.82
- Record of compliant monitoring parameter ranges ^c	2	1	2	1	2	0.1	0.2	\$217.20

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
- Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard for kraft and soda recovery furnaces ^{c,i}	2	1	2	1	2	0.1	0.2	\$217.20
G. Time to train personnel ^{c,j}	40	1	40	1	40	2	4	\$4,341.68
Subtotal for Recordkeeping Requirements						220.08		
Subtotals Labor Burden and cost					284	14.2	28.4	\$30,840.54
TOTAL LABOR BURDEN AND COST (rounded)						326.6 327(rounded)		\$30,840

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be 111. There will be no additional new sources per year that will become subject

to the rule, and one affected facility will be engaged in some kind of modification over the three-year period of this ICR.

^b 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.

^c We have assumed that one existing kraft pulp mills will install one new recovery furnace and smelt dissolving tank (SDT) each year.

^d We have assumed that it will take respondent 2 hours once per year to complete report.

^e We have assumed that it will take respondent 80 hours once per year to write the notification of compliance status report.

^f We have assumed that it will take respondent 40 hours to develop a record system for recording parameter monitoring information.

^g We have assumed that it will take respondent 80 hours once per year to draft the startup, shutdown, and malfunction plan, and an additional 20 hours to review/revisions, for a total of 100 hours.

^h We have assumed that it will take respondent eight hours (1 day) each year to enter records and documentation of supporting calculation for compliance determinations.

ⁱ We have assumed that one existing kraft and soda pulp mill will install new recovery furnaces. Based on current industry trends, the new furnace is expected to be non-direct contact evaporator (NDCE) recovery furnaces equipped with a dry electrostatic precipitator (ESP) system.

^j We have assumed that it will take respondent 40 hours (1 week) once per year to train personnel.

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
Record continuously monitored ^g parameters (per shift)	0.5	1,050	525	111	58,275	2,913.75	5,827.5	\$6,328,781.55
Compile monthly data ^h	16	12	192	111	21,312	1,065.6	2,131.2	\$2,314,525.82
Enter/verify information for quarterly/ semiannual reports ⁱ	8	2	16	111	1,776	88.8	177.6	\$192,877.16
F. Time to train personnel	N/A							
G. Time for refresher training for personnel ^j	16	1	16	111	1,776	88.8	177.6	\$192,877.16
Subtotal for Recordkeeping Requirements						123,506.55		
Subtotals Labor Burden and cost					109,461	5,473.05	10,946.1	\$11,887,683.53
TOTAL LABOR BURDEN AND COST (rounded)						125,880.15 125,880 (rounded)		\$11,887,683

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be 111. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^b 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.

^c We have assumed that five percent of respondents will each take 16 hours four times per year to complete reports of monitoring exceedances and periods of noncompliance.

^d We have assumed that 95 percent of respondents will each take 8 hours two times per year to write reports of no exceedances.

^e We have assumed that each respondent will take 1.5 hours 52 times per year to accomplish the task.

^f We have assumed that each of the respondents of kraft pulp mills will take 1.5 hours 52 times per week to enter the lime production rates information. All of the 89 existing kraft pulp mills have lime kilns.

^g We have assumed that each respondent will take 0.5 hours 1,050 times per year to record continuously monitoring parameters.

^h We have assumed that each respondent will take 16 hours once per month to compile data.

ⁱ We have assumed that each respondent will take 8 hours two times per year to verify information for reports.

^j We have assumed that it will take each respondent 16 hours to provide refresher training for personnel.

Summary (Tables 1a & 1b): Total Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

Annual Burden to Industry	Total Burden Hours Reporting	Total Burden Hours Recordkeeping	Total Burden Hours	Total Costs, \$
Table 1a: One-Time Annual Respondent Burden and Cost	105.8	220.8	326.6	\$30,840.54
Table 1b: Recurrent Annual Respondent Burden and Cost	2,373.6	123,506.55	125,880.15	\$11,887,683.53
TOTAL LABOR BURDEN AND COST (rounded)	2,479.4	123,727.35	126,206.75 (rounded) 126,207	\$11,918,524.07 (rounded) \$11,918,524

Table 2: Average Annual EPA Burden -- NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year ^b	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^a
Report review								
Notification of construction/reconstruction ^c	2	1	2	1	2	0.1	0.2	\$103.65
Notification of actual startup ^c	2	1	2	1	2	0.1	0.2	\$103.65
Notification of applicability ^c	2	1	2	1	2	0.1	0.2	\$103.65
Notification of initial performance test ^c	2	1	2	1	2	0.1	0.2	\$103.65
Notification of performance evaluation ^c	2	1	2	1	2	0.1	0.2	\$103.65
Review of notification of compliance status ^d	4	1	4	1	2	0.1	0.2	\$103.65
Review of excess emissions report								
Quarterly reports of monitoring exceedances and periods of noncompliance ^e	8	4	32	6	192	9.6	19.2	\$6,079.98
Semiannual reports of no exceedances ^f	2	2	4	105	210	10.5	21	\$10,883.14
Subtotals Labor Burden and cost					414	20.7	41.4	\$17,585.02
TOTAL ANNUAL BURDEN AND COST (rounded)					476.1 476 (rounded)			\$17,585

Assumptions:

^a This cost is based on the following labor rates which incorporate 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, \$28.99 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.

^b We have assumed that the average number of existing sources subject to the rule will be 111. There will be no additional new sources per year that will become subject to the rule, and one affected facility will be engaged in some kind of modification each year over the three-year period of this rule.

^c We have assumed that it will take respondent 2 hours once per year to complete report review.

^d We have assumed that it will take respondent 4 hours once per year to review the compliance status report.

^e We have assumed that five percent of respondents (5% x 111 = 6) will each take 8 hours four times per year to review the monitoring exceedances and periods of noncompliance report.

^f We have assumed that 95 percent of respondents (95% x 111 = 105) will each take 2 hours two times per year to review the no exceedances report.