SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

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

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) (Amendments), EPA ICR Number 2452.02, OMB Control Number 2060-NEW

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. Amendments to the Pulp and Paper Production NESHAP are being promulgated as a result of the residual risk and technology review (RTR) required under by the Clean Air Act (as discussed further below). The Pulp and Paper Production NESHAP applies 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, all NESHAP 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 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 (EPA) regional office.

The amendments to the rule eliminate the startup, shutdown, and malfunction exemption, remove the SSM plan requirement, add provisions to provide an affirmative defense against civil penalties for exceedances of emission standards caused by malfunctions, add a requirement for electronic submittal of performance test data, and correct editorial errors. The remaining

portions of the NESHAP remain unchanged.

Of 171 major source mills, approximately 114 mills have equipment subject to the standard, and it is estimated that no new major sources will become subject to the standard in the next three years. These assumptions are based on the research conducted by EPA during the subpart S rule making, consultation with the industry, and an information collection request (ICR) conducted by EPA's Office of Air Quality Planning and Standards (OAQPS) in 2011. EPA is also aware that this industry is undergoing widespread consolidation and corporate restructuring, and that no new major source facilities are being built, though approximately 15 percent of the affected facilities will rebuild one or more process units in a given year.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tons per year (tpy) of any single HAP or more than 25 tpy of any combination of HAP. For major sources, these technology-based standards must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts) and are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, HAPs from pulp and paper plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR part 63, subpart S.

Section 112(d)(6) of the CAA requires EPA to review the technology-based MACT standards and revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if EPA determines that the existing standards are sufficiently protective. EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the

standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR part 63, subpart A). CAA 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.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from pulp and paper plants requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from pulp and paper plants are the result of operation of the affected facilities. These standards rely on the collection of HAP emissions in enclosed and closed vent collection. Then, the collected HAPs are incinerated in a boiler, recovery furnace, lime kiln, or thermal incinerator. HAPs associated with kraft pulping condensates are either treated with steam stripping (or equivalent technology) or in a wastewater treatment system. HAPs captured from bleaching systems are controlled with a chlorine gas scrubber. Equipment inspection, performance tests, and leak detection and repair procedures are critical components of the standards. The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. Then, the reviewing authority may inspect the source to ensure that the pollution control system is properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. Repeat performance tests (at 5-year intervals) are needed to ensure ongoing compliance. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. 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 their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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 its 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.

Some of the facilities subject to this NESHAP will also be subject to requirements under the New Source Performance Standard (NSPS) for Kraft Pulp Mills, 40 CFR 60 subpart BB. The burden requested for this NESHAP does not duplicate any of the burden accounted for under NSPS subpart BB.

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

The preamble to the proposed RTR (76 FR 81328, December 27, 2011) provided public notice of this ICR.

3(c) Consultations and Stakeholder Outreach

The amendments were developed in consultation with the Nez Perce, Forest County Potowatomi and Leech Lake Band of Ojibewa.

Stakeholder outreach occurred with industry groups including American Forest and Paper Association (AF&PA), National Council for Air and Stream Improvement (NCASI) and member companies of these organizations. Stakeholder meetings were also held with Sierra Club, Earth Justice, and with organizations that participated in EPA Environmental Justice outreach efforts. Additionally, a public outreach webinar was conducted during the comment period on January 31, 2012 to review the proposed rule. The webinar was coordinated with the tribal governments and the general public. Further stakeholder and public input was received through public comment and follow-up meetings with interested stakeholders.

In addition, EPA/OAQPS conducted a three-part ICR to gather data from the pulp and paper industry. The results from Part I of this ICR were used in updating the burden estimates contained in this supporting statement.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the required 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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

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/NAICS Codes

Respondents included in the subpart S source category are owners/operators of mills that are "major sources" of HAP emissions and produce pulp, perform bleaching, or manufacture paper or paperboard products.[1] According to results of EPA's 2011 pulp and paper ICR, there are a total of 171 major source mills in the U.S. including:

- 111 major source mills that carry out chemical wood pulping (kraft [97], sulfite [5], soda [1], or semi-chemical [8]),
- 33 major source mills that carry out mechanical, groundwood, secondary fiber, and non-wood pulping, and
- 27 major source mills that produce paper or paperboard (but do not produce pulp)

Some mills perform multiple operations (e.g., chemical pulping, bleaching, and papermaking; pulping and unbleached papermaking; etc.). For example, 72 of the major source mills listed above bleach with chlorinated compounds, and 156 major source mills manufacture paper or paperboard products (including both integrated and non-integrated paper mills). Mills that only purchase pre-consumer paper or paperboard stock products and convert them into other

[1] As defined in 40 CFR Part 63, subpart A, "*Major source*" means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence.

products (i.e., converting operations) are not part of the Subpart S source category and are not affected by Subpart S. The North American Industry Classification System (NAICS) codes for respondents affected by the information collection include 32211 for pulp mills, 32212 for paper mills, and 32213 for paperboard mills.

Of the 171 major sources, 114 are estimated to be affected by the Subpart S standards (including 111 chemical pulp mills, and 3 non-integrated paper mills that bleach with chlorinated compounds. Some major source mills (e.g., stand-alone mechanical pulp mills, non-integrated paper mills) are not affected because they do not have any emission sources with requirements under Subpart S.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart S. Subpart S references 40 CFR part 63, subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following reports:

Notification Reports	
Requirement	Regulation Reference (40 CFR part 63)
Construction/reconstruction	63.5
Construction or modification application	63.455(d)
Initial notifications	63.9(b)(2)
Anticipated startup	63.9(b)
Actual startup	63.9(b)(4)(v)
Performance test results	63.10(d)(2), 63.455(h)
Performance tests	63.7(b), 63.9(e)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical or operational change	63.5(b)(4)
Periodic malfunction reports	63.455(g)
Source status report	63.10(e)(3)
Semiannual Control Strategy Update (thru 2006)	63.455(b)
Reports of malfunctions that result in an exceedances of the standard for the purpose of affirmative defense	63.456

A source must maintain the following records:

Recordkeeping	
Requirement	Regulation Reference (40 CFR part 63)
Periods where the continuous monitoring system is inoperative	63.10(b)(2)
Records of malfunctions	63.454(g)
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(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 for closed vent systems	63.454(b)

Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. 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. Modern pulp and paper facilities employ distributive controls on their manufacturing process and have integrated many of the compliance record keeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents currently use electronic reporting. As part of the RTR amendments, respondents would be required to report test results using EPA's Electronic Reporting Tool (ERT) for test methods supported by the ERT.[2]

[2] As of mid-2012, Method 26A is the only test method referenced in subpart S that is included in the ERT.

(ii) Respondent Activities

Respondent activities are as follows:

Respondent Activities
Read instructions.
Install, calibrate, certify, maintain, and operate Continuous Monitoring Systems (CMS) for each of the following affected units: 1.1 Non-Sulfite Pulping Process choice of: a. provide documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or b. provide documentation that the control incinerator is operating at a minimum level of 1600 F and 0.75 second residence time, or c. Performance test of control device using Method 308. 1.2. Sulfite Pulping Process - performance test of control device using test method 308. 2.1. Bleaching Process Vent Scrubber - performance test of scrubber or control device using test Method 26A. 3.1 Non-Sulfite Pulping Wastewater Treatment a. performance test of condensate segregation and control device using test method 305 or b. performance test of biotreatment unit using test Method 304. 3.2 Sulfite Pulping Process a. performance test of control device using test Method 305.
Conduct performance tests using appropriate Reference Test Methods 26A, 304, 305, 308, and repeat performance tests if necessary.
Conduct initial and annual inspections of enclosures, closed vent and wastewater conveyance systems using test Method 21.
Write the notifications 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.
Enter information required to be recorded for continuous monitoring for operating parameters, periodic inspections (monthly visual and annual Method 21), malfunctions, personnel training and time for audits.
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.

In addition to the respondent activities listed above, EPA is including an estimate of the burden associated with performing an affirmative defense. EPA is providing this as an illustrative example of the potential additional administrative burden a source may incur to assert in an Affirmative Defense in response to an action to enforce the standards set forth in the applicable subpart. See section 6(b)(iv) of this ICR for details.

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 and repeat performance tests.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 operated. Performance test reports are used by the Agency to discern a source's initial and ongoing capability to comply with the emission standard, and note the operating conditions, such as, control device fire box temperature, gas and liquid flow rates, production volume, wood species, under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

5(c) Small Entity Flexibility

Approximately 5 percent of the affected HAP major source facilities are considered small business entities, defined as being independently owned and operated and not dominant in their field of operations. 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 requirements the minimum 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.

The recordkeeping and reporting requirements were selected within the context of this specific subpart and the specific process equipment and pollutants. The impact on small businesses was accounted for in the regulation development. The requirements reflect the burden on small businesses. However, the recordkeeping and reporting requirements are the same for small and larger businesses. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The Agency considers these requirements the minimum needed to ensure compliance and cannot reduce them further for small businesses.

5(d) Collection Schedule

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

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 each of the subparts 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. Where 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 52,304 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the NESHAP program, the previously approved ICR and any comments received. No burden estimates are provided for new sources because no new facilities are expected to become affected sources during the 3-year period of this ICR.

6(b) Estimating Respondent Costs

(i) Estimating Labor 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 (BLS), December 2010, "Table 2. Civilian Workers, by occupational and industry group," available at www.bls.gov/news.release/ecec.t02.htm. 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 and Operation and Maintenance Costs

Since no new continuous emission or parameter monitors beyond those that may already be in place are used to comply with this rule, the only type of industry costs associated with the information collection activity in the standards are labor costs and emission testing costs described below.

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

Since this rule does not require any new continuous emission monitoring or electronic monitoring 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 below. These estimates include labor, materials, and analytical costs. The number of mills assumed to contract testing companies for compliance is presented in Table 1. For the entire industry, the number of tests required annually for demonstrating compliance and the associated cost are estimated as follows:

Method	**Count**	**Cost, $**	**Total, $**
Method 308	9	$14,000	$126,000
Method 26A	38	$10,000	$380,000
Method 304	3	$11,000	$ 33,000
Method 305	5	$16,000	$ 80,000
Method 21	74	$ 3,000	$222,000
		TOTAL	$841,000

Based on these estimates for testing costs and the number of mills assumed to perform compliance tests, the total annual cost to the industry is $841,000.

(iv) Affirmative Defense, Root Cause Analysis, and Malfunction Costs

EPA's estimate for a affirmative defense and root cause analysis is based on general experience to calculate the time and effort required of a source to review relevant data, interview

plant employees, and reconstruct the events prior to a malfunction in order to determine primary and contributing causes. The level of effort also includes time to produce and retain the report in document form so that the source will have it available should EPA or state enforcement agencies ever request to review it.

To provide the public with an estimate of the relative magnitude of the burden associated with an assertion of the affirmative defense position adopted by a source, EPA provides an administrative adjustment to this ICR that estimates the costs of the notification, recordkeeping and reporting requirements associated with the assertion of the affirmative defense. EPA's estimate for the required notification, reports and records, including the root cause analysis, associated with a single incident totals approximately $3,258 and is based on the time and effort required of a source to review relevant data, interview plant employees, and document the events surrounding a malfunction that has caused an exceedance of an emission limit. The estimate also includes time to produce and retain the records and reports for submission to EPA. EPA provides this illustrative estimate of this burden because these costs are only incurred if there has been a violation and a source chooses to take advantage of the affirmative defense.

Of the number of excess emission events reported by source operators, only a small number would be expected to result from a malfunction, and only a subset of excess emissions caused by malfunctions would result in the source choosing to assert the affirmative defense. Thus we believe the number of instances in which source operators might be expected to avail themselves of the affirmative defense will be extremely small. For this reason, we estimate no more than 2 or 3 such occurrences for all sources within a given category over the 3-year period covered by this ICR. For the purpose of this estimate, we are adding two (2) instances of affirmative defense. We expect to gather information on such events in the future and will revise this estimate as better information becomes available.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall 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 $310,058, see Table 2 in Section 6(e).

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

Managerial	$62.27	(GS-13, Step 5, $38.92 x 1.6)
Technical	$46.21	(GS-12, Step 1, $28.88 x 1.6)
Clerical	$25.01	(GS-6, Step 3, $15.63 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2011 General Schedule" (http://www.opm.gov/oca/11tables/pdf/gs_h.pdf) which excludes locality rates of pay. These rates were increased by 60 percent to include fringe benefits and overhead. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost. The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records and reports maintained by the respondents, periodic evaluation of sources of emissions, and the analysis, publication and distribution of collected information. The only Federal costs are user costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

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

Based on our research for this ICR, there are approximately 114 existing sources currently subject to the standard, all of which will keep records and submit reports. It is estimated that no additional sources will become subject to the regulation in the next three years. The average number of respondents over the three-year period of this ICR is 114. The number of total annual responses (calculated based on section 3.E in Table 1) is 522.

6(e) Bottom Line 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 costs are $4,939,270. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 100 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $841,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 6,874 labor hours at a cost of $310,058. See Table 2. Annual Agency Burden and Cost, NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) attached.

6(f) Reasons for Change in Burden

This ICR is prepared for amendments to the Pulp and Paper Production NESAHP (40 CFR, Part 63, Subpart S). These amendments: (1) adjusted references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) to remove the startup, shutdown, and malfunction exemption; (2) added affirmative defense reporting to subpart S; and (3) added repeat (5-year) air emissions testing requirements for selected equipment. Adjustments for these amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected mills changed because of: (1) continued consolidation and closures within the pulp and paper industry which reduced the number of mills previously affected by Subpart S; and (2) updates to the number of affected major source mills based on EPA's 2011 pulp and paper sector survey. Further, the percentages of mills using various compliance options were refined based on the results of EPA's 2011 pulp and paper sector survey.

Costs per labor hour increased due to increases in labor rates. In addition, some rows in the former Table 1 were consolidated to eliminate obsolete references to "MACT I" versus "MACT III" since subpart S covers MACT I and MACT III processes. This consolidation eliminates redundancy and the potential for double counting mills with both types of processes.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 100 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 suggestions for minimizing respondent burden, including through the

use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2007-0544, which is available for online viewing at http://www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 Air Docket is (202) 566-1927. An electronic version of the public docket is available at http://www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include Docket ID Number EPA-HQ-OAR-2007-0544 and OMB Control Number 2060-NEW 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) - Amendments

	(A)	(B)		(C)	(D)		(E)	(F)	(G)	(H)
Burden Item	Person-hours per occurrence	Number of occurrences per year	Emissions Testing Cost Per Occurrence	Person-hours per respondent per year (C=AxB)	Number of respondents per year (a)	Note	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Total cost per year
1. Applications	Not applicable									
2. Surveys and Studies	Not applicable									
3. Reporting Requirements										
A. Read and Understand Rule Requirements	30	1	$0	30	171	b,d	5,130	257	513	$557,110
B. Required Activities										
1.1) Pulping processes (Non-Sulfite)										
a. Provide documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or	24	1	$0	24	5	c,e	120	6	12	$13,032
b. Provide documentation that the control incinerator is operating at a minimum level of 1600 F and 0.75 sec residence time, or	60	1	$0	60	1	c,f	60	3	6	$6,516
c. Performance test of control device - test method 308	24	1	$14,000	24	1	c,f,g,n	24	1	2	$2,606
1.2) Pulping Processes (Sulfite) Performance test of control device - test method 308	24	1	$14,000	24	1	c,g,i,n	24	1	2	$2,606
2.1) Bleaching process vent scrubber Performance test of scrubber or control device - test method 26A	24	1	$10,000	24	5	c,g,j,n	120	6	12	$13,032
3.1) Pulping wastewater treatment (Non-Sulfite)										
a. Performance test of condensate segregation and control device (test method 305), or	24	1	$16,000	24	4	c,h,k,n	96	5	10	$10,425
b. Performance test of biotreatment unit - test method 304	24	1	$11,000	24	3	c,h,l,n	72	4	7	$7,819
3.2) Pulping wastewater treatment (Sulfite) Performance test of control device - test method 305	24	1	$16,000	24	1	c,h,m,n	24	1	2	$2,606
4.1) Repeat of performance test (5-yr intervals)										
a. Test method 308 - pulping	24	1	$14,000	24	7	g,n,t	168	8	17	$18,245
b. Test method 26A - bleaching	24	1	$10,000	24	33	g,n,t	792	40	79	$86,010
4.2) Inspection of enclosures, closed vent, wastewater conveyance system										
a. Initial/Annual inspection - test method 21	8	1	$3,000	8	74	o	592	30	59	$64,290
b. Monthly visual inspection	4	12	$0	48	111	o	5,328	266	533	$578,612
C. Create Information	Included in 3.B									
D. Gather Information	Included in 3.B									
E. Report Preparation										
1) Initial Notification Report (<45 days after promulgation)	16	1	$0	16	0	c,d	0	0	0	$0
2) Notification of compliance status	16	1	$0	16	0	c,d	0	0	0	$0
3) Initial Compliance Strategy Report	40	1	$0	40	0	c,p	0	0	0	$0
4) Compliance Strategy Report Update	16	1	$0	16	0	p	0	0	0	$0
5) Semi-annual summary report	16	2	$0	32	114	d	3,648	182	365	$396,167
6) Continuous monitoring/Exceedance reports	24	2	$0	48	17	q	816	41	82	$88,616
7) Notification of performance test (>75 days before test)	4	1	$0	4	129	c,r	516	26	52	$56,037
8) Notification of construction/reconstruction (>180 days beforehand)	4	1	$0	4	17	c,s	68	3	7	$7,385
9) Notification of actual startup (<150 days after startup)	4	1	$0	4	17	c,s	68	3	7	$7,385
10) Affirmative defense	30	1	$0	30	228	u	6,840	342	684	$742,813
4. Recordkeeping Requirements										
A. Read Instructions	Included in 3.A									
B. Plan Activities	Included in 3.B									
C. Implement Activities	Included in 3.B									
D. Develop Record System	40	1	$0	40	114	c,d,v	4,560	228	456	$495,208
E. Record information										
Records of continuous monitoring for operating parameters	2	52	$0	104	114	d	11,856	593	1,186	$1,287,542

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	Emissions Testing Cost Per Occurrence	(C) Person-hours per respondent per year (C=AxB)	(D) Number of respondents per year (a)	Note	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total cost per year
Records of periodic inspections (monthly visual inspections and annual method 21)	Included in 3.B									
Record of malfunctions	2	12	$0	24	114	d	2,736	137	274	$297,125
F. Personnel Training	Not applicable									
G. Time for audits	8	2	$0	16	114	d	1,824	91	182	$198,083
	Total:						**45,482**	**2,274**	**4,548**	**$4,939,270**

TOTAL INDUSTRY BURDEN SUMMARY:	
Total annual responses (based on 3.E)	522
Total annual labor hours	52,304
Average hours per response	100
Annual costs in dollars	$4,939,270

Footnotes

a Values are rounded up to the nearest whole number.

b MACT I Mills include kraft, sulfite, soda, and semi-chemical operations. MACT III Mills include mechanical, non-wood, and secondary fiber operations; along with papermaking at all types of mills. Only major sources are subject to Subpart S.

c One-time activity. In out years, after initial compliance date, assume that 5% of mills affected as a result of unexplained exceedances.

d Performed by all major source mills. (111 major MACT I Category Mills, 60 major stand-alone MACT III category mills) All MACT I category mills are affected by this rule. The only MACT III category mills affected by this rule are those bleaching with chlorinated compounds (3 mills). Total number of mills affected by this rule is 111 + 3 = 114

e Approximately 85% of mills use a recovery boiler, power boiler, or lime kiln for control of pulping vents. There are 106 non-sulfite pulping mills. (85% of 106 = 90)

f Approximately 15% of mills use incineration for pulping lines (assuming half of these provide acceptable design specs (8), and half conduct performance tests (8))

g Estimate includes test plan, test report, and parametric monitoring setup. Method 308 tests for pulping lines and method 26A tests for bleaching lines.

h Estimate includes test plan, test report, and parametric monitoring setup. Method 304 and 305 are for wastewater streams.

i Assume that all 5 sulfite pulping mills will conduct performance tests.

j 69 MACT I and 3 MACT III category mills have bleaching lines that use chlorinated compounds.

k Estimated that each kraft mill has one pulping wastewater control device, with 60% of mills using stream strippers (60% of 97 = 58). Per footnote "c," 5% of 58= 3. Facilities with steam strippers are assumed to perform initial condensate segregation and performance tests.

l Approximately 40% of kraft mills use biotreatment. (40% of 97 = 39) Per footnote "c," 5% of 39 = 2. Facilities with biotreatment control will perform initial performance tests.

m Assume sulfite mills will monitor gas scrubber parameters and use Water-9 Model for emission estimates.

n Assumed that 15% of performance tests are failed and need to be repeated.

o Initial and annual activity. Assumed that EPA is notified each year of the testing. Assumed 2/3 of all MACT I mills have positive pressure points in their vent systems and will have to test using method 21 (2/3 x 111 = 74). Monthly visual inspections are to be conducted by chemical pulp mills (111).

p The requirement for a compliance strategy report is now obsolete (required before 2006 only).

q Assumed that 15% of all affected mills during any one quarter will be required to submit an exceedance report in addition to the summary report. (15% of 115 = 17)

r EPA must be notified of all tests including out-year repeat performance tests and tests conducted at 5-year intervals.

s Assumed 15% of all affected mills conduct construction or reconstruction per year. (15% of 114 = 17)

t Kraft/soda/semichemical mills using compliance options requiring testing (8 mills) are likely to have 3 emission points that would require 5-year repeat testing (LVHC, HVLC, and stripper off gases). Sulfite mills (5) are likely to have 1 emission point to be tested. Total no. M308 tests = [(8 mills x 3 points) + (5 mills x 1 point)] x 1.15 = 33. Annual no. of 5-year repeat M308 tests = 33/5 = 7 tests. Mills bleaching with chlorinated compounds (72 mills) are likely to have two emission points requiring M26A testing. Total no. of M26A tests = (72 x 2) x 1.15 = 166. Annual no. of 5-yr repeat M26A tests = 166/5=33 tests.

u Assumes all affected mills (114) will have 2 malfunctions per year requiring affirmative defense review.

v For this amendment ICR, includes time for reevaluating previously developed SSM-record system at 114 mills according to rule changes. [*This time may be eliminated in future 3-year ICR renewals.*]

Table 2. Annual Agency Burden and Cost of the NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) - Amedments

Burden Item	(A) Number of Respondents Per Year (a)	Note	(B) EPA Hours Per Respondent	(C) Tech Hours Per Year (CxB)	(D) Management Hours Per Year (D=Cx0.05)	(E) Clerical Hours Per Year (E=Cx0.1)	(F) EPA Cost Per Year
1. Applications	Not applicable						
2. Surveys and Studies	Not applicable						
3. Reporting Requirements							
A. Read and Understand Rule Requirements	171	a	6	1026	51	103	$53,170
B. Required Activities							
Initial performance tests:							
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	5	b,c	8	40	2	4	$2,073
b. Review documentation that the control incinerator is operating at a level of at least 1600 F and 0.75 sec residence time, or	1	b,d	8	8	0	1	$415
c. Review performance test of control device	1	b,d,i	8	8	0	1	$415
1.2) Pulping Processes (Sulfite)	1	b,e,i	8	8	0	1	$415
-Revew performance test of control device							
2.1) Bleaching process vent scrubber							
-Review performance test of control device	5	b,f,i	8	40	2	4	$2,073
3.1) Pulping wastewater treatment system (Non-Sulfite) - Choice of:							
a. Review performance test of condensate segregation and control device, or	4	b,g,i	8	32	2	3	$1,658
b. Review performance test of biotreatment unit	3	b,h,i	8	24	1	2	$1,244
3.2) Pulping wastewater treatment (Sulfite)							
-Review performance test of control device	1	b,e,i	8	8	0	1	$415
4.1) Review repeat performance tests (5-yr intervals)							
a. Test method 308 - pulping	7	i,q	8	56	3	6	$2,902
b. Test method 26A - bleaching	33	i,q	8	264	1	1	$12,286
4.2) Inspection of enclosures, closed vent, wastewater conveyance system							
a. Initial/Annual inspection - test method 21	74	j	0	0	0	0	$0
b. Monthly visual inspection	111	j	0	0	0	0	$0
C. Create Information	Included in 3.B						
D. Gather Information	Included in 3.B						
E. Report Preparation							
Review Initial Notification Report	0	b	4	0	0	0	$0
Review Notification of compliance status	0	b	4	0	0	0	$0
Review initial compliance strategy report	0	b,p	4	0	0	0	$0
Review compliance strategy report update	0	b,p	4	0	0	0	$0
Review Semi-annual summary report	114	k	2	228	11	23	$11,816
Review Continuous monitoring/Exceedance reports	17	m	8	136	7	14	$7,048
Review Notification of performance test	129	b,n	8	1032	52	103	$53,481
Review Notification of construction/reconstruction	17	b,o	4	68	3	7	$3,524
Review Notification of actual startup	17	b,o	4	68	3	7	$3,524
Review Affirmative Defense	228	r	8	1824	91	182	$94,524
4. Recordkeeping Requirements							
A. Read Instructions	Included in 3.A						
B. Plan Activities	Included in 3.B						
C. Implement Activities	Included in 3.B						
D. Develop Record System	114	b,k	0	0	0	0	$0
E. Record information							
Review records of monitoring parameters	114	k	1	114	6	11	$5,908

Burden Item	(A) Number of Respondents Per Year (a)	Note	(B) EPA Hours Per Respondent	(C) Tech Hours Per Year (CxB)	(D) Management Hours Per Year (D=Cx0.05)	(E) Clerical Hours Per Year (E=Cx0.1)	(F) EPA Cost Per Year
Review records of periodic inspections (monthly visual inspections and annual method 21)	Included in 3.B						
Review records of malfunctions	114	k	1	114	6	11	$5,908
F. Personnel Training	Not applicable						
G. Time for audits	114	k	8	912	46	91	$47,262
	Total:			**6010**	**288**	**576**	**$310,058**
	TOTAL FEDERAL GOVERNMENT BURDEN SUMMARY:						
	Total hours per year		6,874				
	Annual costs in dollars		$310,058				

Footnotes

a Values are rounded up to nearest whole number. There are 171 majour source mills (111 MACT mills producing chemical pulp, and 60 stand-alone MACT III category mills). All MACT I category mills are afftected by this rule. The only MACT III category mills affected by this rule are those bleaching with chlorinated compounds (3 mills). Total number of mills affected by this rule is 111 + 3 = 114

b One-time activity. After initial compliance date, assume that 5% of mills affected as a result of unexplained exceedances.

c Approximately 85% of mills use a recovery boiler, power boiler, or lime kiln for control of pulping vents. There are 106 non-sulfite pulping mills. (85% of 106 = 90)

d Approximately 15% of mills use incineration for pulping lines (assuming half of these provide acceptable design specs (8), and half conduct performance tests (8))

e Assume that all 5 sulfite pulping mills will conduct performance tests.

f 69 MACT I and 3 MACT III category mills have bleaching lines that use chlorinated compounds.

g Estimated that each kraft mill has one pulping wastewater control device, with 60% of mills using stream strippers (60% of 97 = 58). Facilities installing new biotreatment control will perform initial performance tests.

h Approximately 40% of kraft mills use biotreatment. (40% of 97 = 39)

i Assumed that 15% of performance tests are failed and need to be repeated.

j Initial and annual activity. Assumed that EPA is notified each year of the testing. Assumed 2/3 of all MACT I mills have positive pressure points in their vent systems and will have to test using method 21 (2/3 x 111 = 74). Monthly visual inspections are to be conducted by chemical pulp mills (111).

k Performed for all affected mills. (114)

l Performed for all kraft mills. (97)

m Assumed that 15% of all mills during any one quarter will be required to submit an exceedance report in addition to the summary report. (15% of 114 = 17)

n EPA must be notified of all tests including out-year repeat performance tests and tests conducted at 5-year intervals.

o Assumed 15% of mills conduct construction or reconstruction per year. (15% of 114 = 17)

p The requirement for a compliance strategy report is now obsolete (required before 2006 only).

q Kraft/soda/semichemical mills using compliance options requiring testing (8 mills) are likely to have 3 emission points that would require 5-year repeat testing (LVHC, HVLC, and stripper off gases). Sulfite mills (5) are likely to have 1 emission point to be tested. Total no. M308 tests = [(8 mills x 3 points) + (5 mills x 1 point)] x 1.15 = 33. Annual no. of 5-year repeat M308 tests = 33/5 = 7 tests. Mills bleaching with chlorinated compounds (72 mills) are likely to have two emission points requiring M26A testing. Total no. of M26A tests = (72 x 2) x 1.15 = 166. Annual no. of 5-yr repeat M26A tests = 166/5=33 tests.

r Assumes all affected mills (114) will have 2 malfunctions per year requiring affirmative defense review.