SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS Review for Kraft Pulp Mills
(40 CFR Part 60, Subpart BBa)

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title of the Information Collection

"NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa)." This is a new ICR. The EPA information collection request (ICR) tracking number is 2485.02. The OMB control number is 2060-NEW.

(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) were proposed on September 24, 1976, and promulgated on February 23, 1978. Revisions to the standards were promulgated on May 20, 1986 as a result of the NSPS review required under the Clean Air Act (CAA). This information collection is for a new Subpart BBa, which will apply to emission units which commence construction, modification or reconstruction after May 23, 2013. These standards limit emissions of particulate matter (PM) (where applicable) and total reduced sulfur (TRS) from the following sources at kraft pulp mills: recovery furnaces, smelt dissolving tanks (SDTs), lime kilns, digester systems, brown stock washer (BSW) systems, multiple effect evaporator systems and condensate stripper systems. At pulp mills where kraft pulping is combined with neutral sulfite semi-chemical pulping, the provisions of this subpart are applicable when any portion of the material charged to an affected source is produced by the kraft pulping operation. This subpart includes provisions specifying that sources complying with the TRS standard for digester systems, BSW systems, evaporator systems and condensate stripper systems by venting to a control device must collect the gases in a closed-vent system subject to the provisions of 40 CFR Part 63, Subpart S. Facilities may be exempt from the TRS standard in the NSPS if the facility can demonstrate that TRS emissions from a brown stock washer cannot feasibly be controlled either technically or economically. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BBa.

In general, all NSPS require initial notifications, performance tests and periodic reports by the owners/operators of the affected sources. The owners/operators are also required to maintain records of the occurrence and duration of any startup, shutdown or malfunction in the operation of an affected source, 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 affected sources subject to NSPS. A semiannual summary report, or an excess emissions report in the event there are periods of excess emissions, is also required.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least 2 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 U.S. Environmental Protection Agency (EPA) regional office.

Compared to a related NSPS (Subpart BB), Subpart BBa eliminates the startup, shutdown and malfunction (SSM) exemption, adds provisions to provide an affirmative defense against civil penalties for exceedances of emission standards caused by malfunctions, adds electrostatic precipitator (ESP) and combination ESP/wet scrubber parameter monitoring, adds 5-year repeat performance testing and adds a requirement for electronic submittal of performance test data.

Potential respondents are owners and operators of new, modified, or reconstructed sources (emission units) at kraft pulp mills. It is estimated that two kraft pulp mills per year (for a total of six mills) will have new, modified, or reconstructed emission units that become subject to Subpart BBa in the next 3 years. Mills can have more than one emission unit (e.g., digester, recovery furnace, SDT, lime kiln) onsite.

All of the kraft pulp mills in the United States are owned and operated by the kraft pulp mill industry (the "Affected Public"). None of the facilities in the United States are owned by state, local, or tribal governments or by the Federal government; all these facilities are privately-owned, for-profit businesses. The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa). The burden to the "Federal Government" is attributed to work performed by either Federal employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The EPA is charged under section 111 of the CAA, as amended, to establish standards of performance for new stationary sources that reflect:

> **. . .** application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best system of emission reduction (BSER), formerly referred to as best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every 8 years.

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, PM and TRS emissions from kraft pulp mills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category at 40 CFR Part 60, Subpart BB. Subpart BBa was developed following the second review of Subpart BB.

(b) Use/Users of the Data

The control of PM and TRS from kraft pulp mills not only requires the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of PM and TRS from kraft pulp mills are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using process changes and control technology. The notifications required in the applicable regulations 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 and the regulations are being met.

Performance test reports are needed, as these are the Agency’s record of a source’s initial and ongoing capability to comply with the emission standard and note the operating conditions under which compliance was achieved. The periodic 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 mills affected by the NSPS continue to operate their processes and control equipment used to achieve compliance with the NSPS. Adequate monitoring, recordkeeping and reporting are necessary to ensure compliance with these standards, as required by the CAA. 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. Non-duplication, Consultations, and Other Collection Criteria

(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.

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

The preamble to the proposed NSPS review (78 FR 31316) provided public notice of this ICR. No comments specifically relating to the burden estimates in this ICR were received. However, the text of this ICR was updated following proposal of the NSPS review to reflect changes made to the final rule as a result of public comments. These changes did not impact the burden estimates.

(c) Consultations

During development of the NSPS revisions, the EPA held meetings and conference calls with representatives of the kraft pulp mill industry including the American Forest and Paper Association (AF&PA) and National Council for Air and Stream Improvement (NCASI). Projections of the number of new, modified and reconstructed affected sources expected to be subject to the new Subpart BBa were discussed with the industry representatives prior to development of this ICR.

(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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by the Office of Management and Budget (OMB) at 5 CFR 1320.5.

(f) Confidentiality

Some respondents may consider process data to be confidential. Any such 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).

(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are kraft pulp mills. The North American Industry Classification System (NAICS) code for respondents affected by the standards is 3221—Pulp, Paper, and Paperboard Mills.

(b) Information Requested

(i) Data Items, Including Recordkeeping Requirements. All data in this ICR that are recorded and/or reported are required by the NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

A source must make the following reports:

Notifications and Reports for 40 CFR Part 60, Subpart BBa	
Notification of construction or reconstruction	60.7(a)(1), 60.15
Notification of initial performance test	60.8(d)
Notification of actual startup	60.7(a)(3)
Notification of demonstration of continuous monitoring system (CMS)	60.7(a)(5)
Notification of physical or operational changes	60.7(a)(4)
Notification of opacity or visible emissions observations	60.7(a)(6)
Report of performance test results	60.8(a), 60.288a(b)
Report of continuous emissions monitoring system (CEMS) relative accuracy test audit (RATA) data [a]	60.13(c), 60.288a(c)
Semiannual report	60.7(c), 60.288a(a)
Excess emissions/monitoring systems report	60.7(c), 60.288a(a)
Malfunction report	60.288a(d)

[a] EPA's Electronic Reporting Tool (ERT) does not currently support reporting of TRS CEMS RATA.

A source must maintain the following records:

Recordkeeping for 40 CFR Part 60, Subpart BBa	
Records of CMS performance evaluations	60.7(f), 60.287a(a)
Records of opacity and TRS monitoring data	60.7(f), 60.287a(b)(1)-(2)
Records of operating parameters	60.7(f), 60.287a(b)(3)-(6)
Records of startups, shutdowns and malfunctions and periods where the continuous monitoring system is inoperative	60.7(b), 60.287a(c)
Maintain and retain files for at least 2 years	60.7(f)

Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data, e.g., continuous emissions monitoring. Although personnel at the sources 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 recordkeeping 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 NSPS revisions for Subpart BBa, respondents would be required to report test results using EPA's Electronic Reporting Tool (ERT) for test methods supported by the ERT.[1]

(ii) Respondent Activities. The respondent activities required by Subpart BBa are listed in the following table.

Respondent Activities
Read and understand the rule requirements.
Install, calibrate, maintain and operate CMS.
Conduct performance tests using EPA Reference Methods 5, 9, 16 (or 16A, 16B, 16C) and 202.
Write the notifications and reports listed above.
Develop a record system (e.g., develop, acquire, install and utilize technology and systems for the purpose of processing information; adjust the existing ways to comply with any previously applicable instructions and requirements).
Enter information required to be recorded above.
Transmit, or otherwise disclose the information.

1As of January 2014, Methods 5, 17 and 202 are the test methods referenced in Subpart BBa that are included in ERT. Method 16 (and variants) for TRS measurement are not yet supported by ERT.

In addition to the respondent activities listed above, EPA is including an estimate of the burden associated with performing an affirmative defense. The 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

(a) Agency Activities

The 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 reports, including performance test reports and excess emissions reports, required to be submitted by industry.
Review notifications, including notifications of construction/reconstruction, performance test and actual startup.

(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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 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.

Information contained in the reports is entered into the Air Facility System (AFS), which is operated and maintained by the EPA's Office of Compliance. The AFS is the EPA's database for the collection, maintenance and retrieval of air compliance data for over 125,000 industrial and government-owned facilities. The EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its 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 2 years.

(c) Small Entity Flexibility

Most 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 requirements to be 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.

(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

6. Estimating the Burden and Cost of the Collection

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

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

(a) Estimating Respondent Burden

The average annual burden to industry over the next 3 years from these recordkeeping and reporting requirements is estimated to be 1,905 hours per year (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR for Subpart BB and any comments received.

(b) Estimating Respondent Costs

(i) Estimating Labor Costs. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor of Statistics, September, 2012, "Table 2. Civilian Workers, by Occupational and Industry group." http://www.bls.gov/news.release/ecec.t02.htm. Wages for occupational groups are used as the basis for the labor rates, with a total compensation of $48.23 per hour for technical, $58.33 per hour for managerial, and $24.19 per hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent was used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at $101.28, management at $122.49, and clerical at $50.80.

(ii) Estimating Capital/Startup and Operation and Maintenance (O&M) Costs. The type of industry costs associated with the information collection activities in the subject standard include labor costs (which are addressed elsewhere in this ICR) and the costs associated with continuous monitoring and performance testing. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup costs for continuous monitoring systems (CMS) and the purchase of stack testing services. The annual O&M costs are the ongoing costs to operate and maintain the monitor and the cost for 5-year repeat stack tests (which are not incurred during the initial 3-year ICR period but would be incurred in future ICR renewal years).

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs. The table below summarizes the capital/startup and O&M costs associated with CMS and performance tests.

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

(A) Continuous Monitoring Device	(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)
Opacity monitor	$40,000	2	$80,000	$8,600	4	$34,400
TRS monitor	$108,000	2	$216,000	$23,000	4	$92,000
ESP voltage and current monitors	$31,000	2	$62,000	$4,200	4	$16,800
Scrubber pressure drop monitor [a]	$350	2	$700	$70	4	$280
Scrubber liquid flow rate monitor [a]	$15,500	2	$31,000	$3,100	4	$12,400
Performance tests:						
Initial Method 9 for opacity	$1,000	2	$2,000			
Initial Methods 5 and 202 for PM and condensable PM (CPM)	$6,800	2	$13,600			
Initial Method 16, 16A, 16B or 16C for TRS	$3,000	2	$6,000			
Repeat Methods 5 and 202 for PM and CPM (every 5 years) [b]				$6,800	0	$0
Repeat Method 16, 16A, 16B or 16C for TRS (every 5 years) [b]				$3,000	0	$0

(A) Continuous Monitoring Device	(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)
Total			**$411,300**			**$155,880**
Total capital + O&M cost						**$567,180**

[a] Scrubber monitor O&M costs were estimated as 20 percent of the initial monitor cost.
[b] Repeat tests are required in 5-year intervals. No respondents would conduct repeat tests during the initial 3-year ICR period.

The total capital/startup costs per year for this ICR are $411,300. This is the total of column D in the above table. The total operation and maintenance (O&M) costs are $155,880. This is the total of column G. The average annual cost for capital/startup and operation and maintenance costs to industry over the next 3 years of the ICR is estimated to be $567,180. These are recordkeeping costs.

(iv) Affirmative Defense, Root Cause Analysis and Malfunction Costs. The 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 12 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 $3,375 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. The 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 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.

(c) Estimating Agency Burden and Cost

The costs to the Agency of this NSPS revision are documented in Table 2: Average Annual EPA Burden and Cost - NSPS Review for Kraft Pulp Mills. The only costs to the Agency

are those 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. The average annual Agency cost during the 3 years of the ICR is estimated to be $12,748.

The Agency labor rates are from the Office of Personnel Management (OPM) "2012 General Schedule" which excludes locality rates of pay. These rates can be obtained from Salary Table 2012-GS, available on the OPM website at http://www.opm.gov/oca/12tables/html/gs_h.asp. The government employee labor rates are $15.63 per hour for clerical (GS-6, Step 3), $28.88 for technical (GS-12, Step 1) and $38.92 for managerial (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at $25.01, technical at $46.21 and managerial at $62.27.

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

It is estimated that two kraft pulp mills per year (for a total of six mills) will have new, modified, or reconstructed emission units that become subject to Subpart BBa in the next 3 years. The total annual labor costs are $186,324. Details regarding these estimates may be found below in Table 1: Annual Respondents Burden and Cost – NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

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

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

(i) Respondent Tally. The total annual labor hours are 1,905. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $567,180. 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 the next 3 years is estimated to be 136 labor hours, at a cost of $12,748. See below Table 2: Average Annual EPA Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

(f) Reasons for Change in Burden

There is no change in burden because this is a new Information Collection.

(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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-OAR-2012-0640. 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 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 in this document. The documents are also available for public viewing at the EPA Docket Center, EPA West, Room 3334, 1301 Constitution Avenue, 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 docket center is (202) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2012-0640 and OMB Control Number 2060-NEW in any correspondence.

Part B of the Supporting Statement

This part is not applicable because statistical methods are not used in data collection associated with the rule.

Table 1: Annual Respondent Burden and Cost – NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A × B)	(D) Respondents per year [a]	(E) Technical person-hours per year (C × D)	(F) Management person hours per year (E × 0.05)	(G) Clerical person hours per year (E × 0.1)	(H) Total cost per year [b]
1. Applications	N/A							
2. Survey and studies	N/A							
3. Reporting requirements								
A. Read and understand rule requirements	30	1	30	2	60	3.0	6.0	$6,749
B. Required activities								
Initial performance tests [c,d]	80	1	80	2	160	8.0	16	$17,998
5-year repeat performance tests [c,d]	80	1	80	0	0	0	0	$0
Repeated performance tests due to failure [c,e]	80	1	80	0.4	32	1.6	3.2	$3,600
C. Gather existing information	See 3B							
D. Write report								
Notification of construction/reconstruction	2	1	2	2	4.0	0.2	0	$450
Notification of performance test [e]	2	1.2	2	2	4.8	0.2	0	$540
Notification of actual startup	2	1	2	2	4.0	0.2	0	$450
Notification of CMS demonstration	2	1	2	2	4.0	0.2	0	$450
Notification of physical or operational changes	2	1	2	2	4.0	0.2	0	$450
Notification of opacity observations	2	1	2	2	4.0	0.2	0	$450
Report of performance test (including submittal through EPA's ERT)[e,f]	4	1.2	5	2	9.6	0.5	1.0	$1,080
Semiannual report [g,h]	8	2	16	4	64	3.2	6.4	$7,199
Excess emissions/monitoring systems report [h,i]	20	2	40	4	160	8.0	16	$17,998
Malfunction report (affirmative defense) [h,j]	30	2	60	4	240	12	24	$26,997
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system [k]	40	1	40	2	80	4.0	8.0	$8,999
E. Time to enter and transmit information								
Records of monitoring data [l]	0.5	365	183	4	730	37	73	$82,116
Records of malfunctions	2	12	24	4	96	4.8	9.6	$10,799
TOTAL LABOR BURDEN AND COST (rounded)						**1,905**		**$186,324**
Total annual responses:				**26**				
Hours per response:				**22**				

Assumptions:

[a] Assumes an average of 2 mills responding each year over the next 3 years based on rulemaking projections that 10 mills will be impacted by the NSPS review (Subpart BBa) over 5 years (10 mills/5 years = 2 mills per year)

[b] This ICR uses the following labor rates: $122.49 per hour for Executive, Administrative, and Managerial labor; $101.28 per hour for Technical labor, and $50.80 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "Table 2 - Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by occupational and industry group, September 2012."The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] Assumes it will take 80 hours for each new respondent to coordinate the initial performance tests for PM, CPM, opacity and TRS. Testing contractor costs are included in the capital/startup and O&M costs.

[d] No 5-year repeat test would be conducted during the initial 3-year ICR approval. Repeat tests would begin in year 5.

[e] Assumes that 20 percent of respondents would repeat a performance test due to failure.

[f] Hard copy report of performance test is included in 3B. Submittal of performance test data through EPA's ERT is estimated to require 4 hours per test.

[g] Assumes that it will take each respondent 8 hours to complete the semiannual report.

[h] Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods. Year 1 = 2, Year 2 = 2+2 = 4, Year 3 = 2+2+2 = 6. Average(2,4,6) = 4 respondents.

[i] Assumes respondents will each take 20 hours two times per year to review monitoring data (e.g., to document compliance with allowances) and complete the excess emissions report.

[j] Assumes that it will take each respondent 30 hours to complete the affirmative defense report. Assumes each respondent will have 2 malfunctions per year for which they provide affirmative defense.

[k] Includes time to adjust existing data acquisition systems at modified sources to include startup and shutdown periods and comply with revised monitoring allowances. One-time activity.

[l] Assumes that it will take each respondent 30 minutes per day to document monitoring data (e.g., operating parameters, opacity and TRS monitoring data, CMS performance evaluations, and startup/shutdown).

Table 2: Average Annual EPA Burden and Cost - NSPS Review for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (A × B)	(D) Plants per year [a]	(E) Technical person-hours per year (C × D)	(F) Management person-hours per year (E × 0.05)	(G) Clerical person-hours per year (E × 0.1)	(H) Cost [b]
1. Attend initial performance test [c]	24	1	24	2	48	2.4	4.8	$2,487
2. Attend repeat performance test [c,d]	24	0.2	5	2	10	0.5	1.0	$497
3. Report review								
Review notification of construction/reconstruction	2	1	2	2	4.0	0.2	0.4	$207
Review notification of performance test [e]	0.5	1.2	1	2	1.2	0.06	0.1	$62
Review notification of actual startup	0.5	1	1	2	1.0	0.05	0.1	$52
Review notification of CMS demonstration	0.5	1	1	2	1.0	0.05	0.1	$52
Review notification of physical/operational changes	0.5	1	1	2	1.0	0.05	0.1	$52
Review notification of opacity observations	0.5	1	1	2	1.0	0.05	0.1	$52
Review performance test reports [e]	8	1.2	10	2	19	1.0	1.9	$995
Review semiannual report [f,g]	4	2	8	4	32	1.6	3.2	$1,658
Review excess emissions/monitoring systems report [f,g]	8	2	16	4	64	3.2	6.4	$3,317
Review malfunction report [f,g]	8	2	16	4	64	3.2	6.4	$3,317
Subtotals Labor Burden and Cost					***118***	***5.9***	***12***	
TOTAL ANNUAL BURDEN AND COST (rounded)					**136**			**$12,748**

Assumptions:

[a] Assumes an average of 2 respondents impacted each year over the next 3 years.

[b] This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6) and $25.01 Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2012 General Schedule" which excludes locality rates of pay.

[c] Assumes that it will take EPA personnel 24 hours to attend each performance test.

[d] Assumes that 20 percent of respondents will repeat performance test due to failure.

[e] Only initial performance tests are included in this first 3-year ICR period. In later years, 5-year repeat tests will need to be included.

[f] Assumes that it will take EPA personnel 4 hours to review each semiannual report and 8 hours to review each excess emissions report and malfunction report.

[g] Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods. Year 1 = 2, Year 2 = 2+2 = 4, Year 3 = 2+2+2 = 6. Average(2,4,6) = 4 respondents.