

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal), EPA ICR Number 1657.09, OMB Control Number 2060-0387.

The reporting and recordkeeping requirements and associated burden currently approved under OMB Control Number 2060-0681 is being consolidated into this ICR as part of this renewal package.

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. The rule was amended on September 11, 2012 as a result of the residual risk and technology review (RTR) required under the Clean Air Act. The 2012 amendment eliminated the startup, shutdown, and malfunction (SSM) exemption, removed the SSM plan requirement, added a requirement for 5-year repeat performance tests, added a requirement for electronic submittal of performance test data, and corrected editorial errors. These regulations apply to existing and new 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 (HAP) or 25 tons per year or more of any combination of HAPs. Affected sources are all 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. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart S.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall 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 (EPA) regional office.

Of 171 major source mills, approximately 114 mills have equipment subject to the standard (including 111 chemical pulp mills and 3 non-integrated paper mills that bleach with chlorinated compounds). It is estimated that no new sources per year will become subject to the standard over the next three years. However, approximately 15 percent of the affected facilities will rebuild one or more existing process units in a given year.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance”.

The 114 pulp and paper production facilities are owned and operated by the pulp and paper industry, which are privately-owned, for-profit businesses. None of these facilities in the United States are owned by state, local, tribal or the Federal government. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors and can be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

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. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, HAP emissions from pulp and paper production facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at

40 CFR Part 63, Subpart S.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. Repeat performance tests (at 5-year intervals) are needed to ensure ongoing compliance.

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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are 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.

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

An announcement of a 60-day public comment period for the renewal of this ICR was published in the Federal Register on May 27, 2014. The Agency received one public comment in the docket; the commenter opposed any new regulation or rule changes to the NESHAP. This ICR renewal will not result in any regulatory changes. EPA updated the ICR, and an announcement of a 30-day public comment followed, and no comments were received. A

secondary announcement of a 60-day public comment period for the renewal of this ICR was published via the Federal Register on October 15, 2018. No comments were received.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. 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 EPA's Office of Compliance. OTIS is EPA's 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 and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Forest & Paper Association (AF&PA) at (202) 463-2599 and the Alabama Pulp & Paper Council (APPCO) at (334) 386-3000.

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. The comments received and our responses may be found in Section 3(b) above and the docket for this ICR at <http://www.fdms.gov>.

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

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 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 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 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 (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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of pulp and paper mills that are major sources of HAP. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes for this source category are shown below.

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

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S).

A source must make the following reports:

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

Reports	
Source status report	63.10(e)(3)
Semiannual Control Strategy Update (thru 2006)	63.455(b)
Periodic malfunction reports	63.455(g)

A source must keep the following records:

Recordkeeping	
Periods where the continuous monitoring system is inoperative	63.10(b)(2)
Records of malfunction	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

Some of the respondents are using monitoring equipment that automatically records

parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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 RTR amendments, respondents would be required to report test results using EPA's Electronic Reporting Tool (ERT) for test methods supported by the ERT¹.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate 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.
Perform performance tests, Reference Method 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 listed above.

¹ As of mid-2012, Method 26A is the only test method referenced in Subpart S that is included in the ERT.

Respondent Activities
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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide 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.

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 Online Tracking Information System (OTIS).

5(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 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's 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 and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/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. 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. 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 in below Table 1: Annual Respondent Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. 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 44,438 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "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 emission testing. There are no capital/startup costs because no new continuous emission or parameter monitors beyond those that may already be in place are used to comply with this rule.

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

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 with the test methods required for this rule, the purchase of service for each method is estimated below. These estimates include labor, materials, and analytical costs.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Emission Test	(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)
Method 308	NA			\$14,000	9	\$126,000
Method 26A	NA			\$10,000	38	\$380,000
Method 304	NA			\$11,000	3	\$33,000
Method 305	NA			\$16,000	5	\$80,000
Method 21	NA			\$3,000	74	\$222,000
Total						\$841,000

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$841,000. 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 \$841,000. These are recordkeeping costs.

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 \$219,095.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 General Schedule,

which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 114 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 114 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
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	17	114	0	17	114
2	17	114	0	17	114
3	17	114	0	17	114
Average	17	114	0	17	114

¹ New respondents include sources with constructed or reconstructed facilities. In this standard existing respondents submit initial notifications.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 114.

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
Initial notification report	0	1	0	0
Notification of compliance status	0	1	0	0
Initial compliance strategy report	0	1	0	0
Compliance strategy report update	0	1	0	0
Semiannual summary report	114	2	0	228
Continuous monitoring / exceedance report	17	2	0	34
Notification of performance test	129	1	0	129
Notification of construction / reconstruction	17	1	0	17
Notification of actual startup	17	1	0	17
			Total	425

The number of Total Annual Responses is 425.

The total annual labor costs are \$4,350,626. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

6(e) Bottom Line Burden Hours 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 44,438. 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) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 105 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 4,814 labor hours at a cost of \$219,095. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal).

6(f) Reasons for Change in Burden

There is a net decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens for the two ICRs being consolidated in this renewal (2060-0387 and 2060-0681). In consolidating the two ICRs, EPA removed burden for duplicate items and updated the ICR so that it only reflects current requirements.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 105 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 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-2014-0054. 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 contents of the 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 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 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 docket center is (202) 566-1927. 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 the EPA Docket ID Number EPA-HQ-OECA-2014-0054 and OMB Control Number 2060-0387 in any

correspondence.

Part B of the Supporting Statement

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

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

Burden Item	(A) Hour per Occurrence	(B) Number of Occurrences per Year	(C) Hour per Respondent-Yr (C=AxB)	(D) Number of Respondents per Year ^a	(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
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read and Understand Rule Requirements ^{b,d}	30	1	30	171	5,130	256.5	513	\$577,576.44
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 ^{c,e}	24	1	24	5	120	6	12	\$13,510.56
b. Provide documentation that the control incinerator is operating at a minimum level of 1600 F and 0.75 sec residence time, or ^{c,f}	60	1	60	1	60	3	6	\$6,755.28
c. Performance test of control device - test method 308 ^{c,f,g,n}	24	1	24	1	24	1.2	2.4	\$2,702.11
1.2) Pulping Processes (Sulfite) ^{c,g,i,n}								
Performance test of control device - test method 308	24	1	24	1	24	1.2	2.4	\$2,702.11
2.1) Bleaching process vent scrubber ^{c,g,j,n}								
Performance test of scrubber or control device - test method 26A	24	1	24	5	120	6	12	\$13,510.56
3.1) Pulping wastewater treatment (Non-Sulfite)								
a. Performance test of condensate segregation and control device (test method 305), or ^{c,h,k,n}	24	1	24	4	96	4.8	9.6	\$10,808.45
b. Performance test of control device - test method 305 ^{c,h,l,n}	24	1	24	3	72	3.6	7.2	\$8,106.34
3.2) Pulping wastewater treatment (Sulfite) ^{c,h,m,n}								
Performance test of control device - test method 305	24	1	24	1	24	1.2	2.4	\$2,702.11
4.1) Repeat of performance test (5-yr intervals) ^{g,n,t}								
a. Test method 308 - pulping	24	1	24	7	168	8.4	16.8	\$18,914.78
b. Test method 26A - bleaching	24	1	24	33	792	39.6	79.2	\$89,169.70
4.2) Inspection of enclosures, closed vent, wastewater conveyance system ^o								
a. Initial/Annual inspection - test method 21	8	1	8	74	592	29.6	59.2	\$66,652.10

Burden Item	(A) Hour per Occurrence	(B) Number of Occurrences per Year	(C) Hour per Respondent-Yr (C=AxB)	(D) Number of Respondents per Year ^a	(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
b. Monthly visual inspection	4	12	48	111	5,328	266.4	532.8	\$599,868.86
C. Create Information	See 3.B							
D. Gather Information	See 3.B							
E. Report Preparation								
1) Initial Notification Report (<45 days after promulgation) ^{c,d}	16	1	16	0	0	0	0	\$0
2) Notification of Compliance Status ^{c,d}	16	1	16	0	0	0	0	\$0
3) Initial Compliance Strategy Report ^{c,p}	40	1	40	0	0	0	0	\$0
4) Compliance Strategy Report Update ^p	16	1	16	0	0	0	0	\$0
5) Semiannual Summary Report ^d	16	2	32	114	3,648	182.4	364.8	\$410,721.02
6) Continuous Monitoring/Exceedance Reports ^q	24	2	48	17	816	40.8	81.6	\$91,871.81
7) Notification of Performance Test (>75 days before test) ^{c,r}	4	1	4	129	516	25.8	51.6	\$58,095.41
8) Notification of Construction / Reconstruction (>180 days before) ^{c,s}	4	1	4	17	68	3.4	6.8	\$7,655.98
9) Notification of Actual Startup (<150 days after startup) ^{c,s}	4	1	4	17	68	3.4	6.8	\$7,655.98
10) Affirmative Defense ^u	30	1	30	0	0	0	0	\$0
Subtotal for Reporting Requirements						20,316		\$1,988,979.61
4. Recordkeeping Requirements								
A. Read Instructions	See 3.A							
B. Plan Activities	See 3.B							
C. Implement Activities	See 3.B							
D. Develop Record System ^{c,d,v}	40	1	40	114	4,560	228	456	\$513,401.28
E. Record Information								
Records of continuous monitoring for operating parameters ^d	2	52	104	114	11,856	592.8	1,185.6	\$1,334,843.33
Records of periodic inspections (monthly visual inspections and annual method 21) ^d	See 3.B							
Records of malfunctions ^d	2	12	24	114	2,736	136.8	273.6	\$308,040.77
F. Personnel Training	N/A							
G. Time for Audits	8	2	16	114	1,824	91.2	182.4	\$205,360.51
Subtotal for Recordkeeping Requirements						24,122		\$2,361,645.89
TOTAL ANNUAL BURDEN AND COSTS (ROUNDED)						44,438		\$4,350,625.50

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. ($85\% \text{ of } 106 = 90$)
- 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 ($60\% \text{ of } 97 = 58$). 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. ($40\% \text{ of } 97 = 39$) 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 ($2/3 \times 111 = 74$). 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. ($15\% \text{ of } 115 = 17$)
- 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. ($15\% \text{ of } 114 = 17$)
- 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 = $[(8 \text{ mills} \times 3 \text{ points}) + (5 \text{ mills} \times 1 \text{ point})] \times 1.15 = 33$. 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 = $(72 \times 2) \times 1.15 = 166$. Annual no. of 5-yr repeat M26A tests = $166/5 = 33$ tests.
- u – Assumes no 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: Average Annual EPA Burden and Cost – NESHAP for Pulp and Paper Production (40 CFR Part 63, Subpart S) (Renewal)

Burden Item	(A) Number of Respondent s per Year ^a	(B) EPA Hours per Respondent	(C) Technical Person- Hours per Year (C=AxB)	(D) Management Person- Hours per Year (D=Cx0.05)	(E) Clerical Person- Hours per Year (E=Cx0.1)	(H) EPA Cost per Year
1. Applications	N/A					
2. Surveys and Studies	N/A					
3. Reporting Requirements						
A. Read and Understand Rule Requirements ^a	171	6	1,026	51.3	102.6	\$53,700.84
B. Required Activities						
Initial performance tests:						
1.1) Pulping processes (Non-Sulfite)						
a. Review documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or ^{b, c}	5	8	40	2	4	\$2,093.60
b. Review documentation that the control incinerator is operating at a minimum level of 1600 F and 0.75 sec residence time, or ^{b, d}	1	8	8	0.4	0.8	\$418.72
c. review Performance test of control device ^{b, d, i}	1	8	8	0.4	0.8	\$418.72
1.2) Pulping Processes (Sulfite) ^{b, e, i}						
Review performance test of control device	1	8	8	0.4	0.8	\$418.72
2.1) Bleaching process vent scrubber ^{b, f, i}						
Review performance test of control device	5	8	40	2	4	\$2,093.60
3.1) Pulping wastewater treatment (Non-Sulfite)						
a. Review performance test of condensate segregation and control device, or ^{b, g, i}	4	8	32	1.6	3.2	\$1,674.88
b. Review performance test of biotreatment unit ^{b, h, i}	3	8	24	1.2	2.4	\$1,256.16
3.2) Pulping wastewater treatment (Sulfite) ^{b, e, i}						
Review performance test of control device	1	8	8	0.4	0.8	\$418.72
4.1) Repeat of performance test (5-yr intervals) ^{i, q}						
a. Test method 308 - pulping	7	8	56	2.8	5.6	\$2,931.04
b. Test method 26A - bleaching	33	8	264	13.2	26.4	\$13,817.76
4.2) Inspection of enclosures, closed vent, wastewater conveyance system ^j						

Burden Item	(A) Number of Respondent s per Year ^a	(B) EPA Hours per Respondent	(C) Technical Person- Hours per Year (C=AxB)	(D) Management Person- Hours per Year (D=Cx0.05)	(E) Clerical Person- Hours per Year (E=Cx0.1)	(H) EPA Cost per Year
a. Initial/Annual inspection - test method 21	74	0	0	0	0	\$0
b. Monthly visual inspection	111	0	0	0	0	\$0
C. Create Information	See 3.B					
D. Gather Information	See 3.B					
E. Report Preparation						
1) Review Initial Notification Report ^b	0	4	0	0	0	\$0
2) Review Notification of Compliance Status ^b	0	4	0	0	0	\$0
3) Review Initial Compliance Strategy Report ^{b,p}	0	4	0	0	0	\$0
4) Review Compliance Strategy Report Update ^{b,p}	0	4	0	0	0	\$0
5) Review Semiannual Summary Report ^k	114	2	228	11.4	22.8	\$11,933.52
6) Review Continuous Monitoring/Exceedance Reports ^m	17	8	136	6.8	13.6	\$7,118.24
7) Review Notification of Performance Test ^{b,n}	129	8	1,032	51.6	103.2	\$54,014.88
8) Review Notification of Construction / Reconstruction ^{b,o}	17	4	68	3.4	6.8	\$3,559.12
9) Review Notification of Actual Startup ^{b,o}	17	4	68	3.4	6.8	\$3,559.12
10) Review Affirmative Defense ^r	0	8	0	0	0	\$0
4. Recordkeeping Requirements						
A. Read Instructions	See 3.A					
B. Plan Activities	See 3.B					
C. Implement Activities	See 3.B					
D. Develop Record System ^{b,k}	114	0	0	0	0	\$0
E. Record Information						
Review Records of continuous monitoring for operating parameters ^k	114	1	114	5.7	11.4	\$5,966.76
Review Records of periodic inspections (monthly visual inspections and annual method 21)						
Review records of malfunction ^k	114	1	114	5.7	11.4	\$5,966.76
F. Personnel Training	N/A					
G. Time for Audits ^k	114	8	912	45.6	91.2	\$47,734.08
TOTAL BURDEN AND COSTS				4,814		\$219,095.24

Footnotes:

- a – Values are rounded up to nearest whole number. There are 171 major source mills (111 MACT mills producing chemical pulp, and 60 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 $111 + 3 = 114$
- 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 ($2/3 \times 111 = 74$). 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 = $[(8 \text{ mills} \times 3 \text{ points}) + (5 \text{ mills} \times 1 \text{ point})] \times 1.15 = 33$. 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 = $(72 \times 2) \times 1.15 = 166$. Annual no. of 5-yr repeat M26A tests = $166/5=33$ tests.
- r – Assumes no affirmative defense review.