SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal), EPA ICR Number 1805.07, OMB Control Number 2060-0377.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills were proposed April 15, 1998, promulgated on January 12, 2001, and most recently amended on April 20, 2006. These regulations apply to existing and new chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills where the total hazardous air pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP; or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart MM.

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.

Over the next three years, approximately 111 sources are currently subject to the standard. This estimate consists of 89 kraft mills, 9 kraft and semichemical mills, 1 kraft and sulfite mill, 7 stand-alone semichemical mills, 4 sulfite mills, and 1 soda mill. It is estimated that no additional respondents per year will become subject to the standard; however, one of the existing facilities will be engaged in a modification each year over the three-year period of this ICR.

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

There are approximately 111 chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills in the United States. None of the 111 facilities in the United States are owned by state, local, tribal or the Federal government. They are owned and operated by privately owned for-profit businesses.

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

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standards 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 quarterly and 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

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 public comment period for the renewal of this ICR was published in the Federal Register (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by 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 and Paper Association at (202) 463-2700 and the American Wood Council at (202) 463-2766.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

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 chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mill. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

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

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM).

A source must make the following reports:

Notifications	
Initial notifications, reports of startups, shutdowns, malfunctions, construction/reconstruction, and modification	63.5, 63.9(b), 63.10(d)(5), 63.867(a)
Notification and report of performance test and results	63.7(b), 63.9(e), 63.10(d)(2), 63.867(a)
Notification of initial continuous monitoring system (CMS)/ continuous opacity monitoring system (COMS) demonstration	63.9(g), 63.867(a)
Notification and report of compliance status	63.9(h), 63.867(b)(1)-(2)
Reporting results of CMS/COMS demonstration	63.10(e)(2), 63.867(a)
Excess emissions reports (quarterly and semiannual)	63.10(e)(3),

Notifications	
	63.867(c)
Certification that a non-direct contact evaporator (NDCE) recovery furnace equipped with a dry electrostatic precipitation (ESP) system is used to comply with a gaseous organic HAP standard in 63.862(c)(1)	63.866(c)(6)

A source must keep the following records:

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

Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting

systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 25A, 29, or 308 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
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., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

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

Agency Activities
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 (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 the 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

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is

shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

6. 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 126,207 (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 continuous monitoring. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

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

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

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

The total operation and maintenance (O&M) costs for this ICR are $712,000. 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 $712,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 $32,765.

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

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

Based on our research for this ICR, on average over the next three years, approximately 111 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject; however, one existing respondent will modify its facility and be subject to initial requirements. The overall average number of respondents, as shown in the table below, is 111 per year.

The number of respondents is calculated using the following table 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	1	111	0	1	111
2	1	111	0	1	111
3	1	111	0	1	111
Average	1	111	0	1	111

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

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 111.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D

Total Annual Responses				
Notification of construction/reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of applicability of standards	1	1	0	1
Notification of initial performance test	1	1	0	1
Notification of performance evaluation	1	1	0	1
Notification of compliance status	1	1	0	1
Quarterly report of monitoring exceedances and periods of noncompliance	6	4	0	24
Semiannual report of no exceedances	105	2	0	210
			Total	240

The number of Total Annual Responses is 240.

The total annual labor costs are $12,355,970. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

6(e) Bottom Line Burden Hours 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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 126,207. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

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

The total annual capital/startup and O&M costs to the regulated entity are $712,000. 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 720 labor hours at a cost of $32,765. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

6(f) Reasons for Change in Burden

There is no change in burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 526 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA 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-2014-0061. 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-2014-0061 and OMB Control Number 2060-0377 in any correspondence.

Part B of the Supporting Statement

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

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

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions	2	1	2	1	2	0.1	0.2	$225.18
B. Required activities	See 3E							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction [c]	2	1	2	1	2	0.1	0.2	$225.18
Notification of actual startup [c]	2	1	2	1	2	0.1	0.2	$225.18
Notification of applicability of standard [c]	2	1	2	1	2	0.1	0.2	$225.18
Notification of initial performance test [c]	2	1	2	1	2	0.1	0.2	$225.18
Notification of performance evaluation [c]	2	1	2	1	2	0.1	0.2	$225.18
Notification of compliance status [c]	80	1	80	1	80	4	8	$9,007.04
Excess emissions report								
Quarterly report of monitoring exceedances and periods of noncompliance [d]	16	4	64	6	384	19.2	38.4	$43,233.79
Semiannual report of no exceedances [d]	8	2	16	105	1,680	84	168	$189,147.84
Subtotal for Reporting Requirements					**2,479.4**			**$242,739.73**
4. Recordkeeping requirements								

A. Read instructions	See 4E							
B. Plan activities	See 4E							
C. Implement activities	See 4E							
D. Develop record system	40	1	40	1	40	2	4	$4,503.52
E. Develop startup, shutdown, and malfunction plans [c, e]	100	1	100	1	100	5	10	$11,258.80
F. Time to enter information								
Records and documentation of supporting calculations for compliance determinations [c, f]	8	1	8	1	8	0.4	0.8	$900.70
Record of compliant monitoring parameter ranges [c]	2	1	2	1	2	0.1	0.2	$225.18
Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard for kraft and soda recovery furnaces [c, g]	2	1	2	1	2	0.1	0.2	$225.18
Records of startup, shutdown, and malfunction [h]	1.5	52	78	111	8,658	432.9	865.8	$974,786.90
Records of black liquor solids firing rates for recovery furnaces and semichemical combustion units [h]	1.5	52	78	111	8,658	432.9	865.8	$974,786.90
Records of lime production for lime kilns [i]	1.5	52	78	89	6,942	347.1	694.2	$781,585.90
Records of CMS data								
Record continuously monitored parameters (per shift) [j]	0.5	1,050	525	111	58,275	2,913.75	5,827.5	$6,561,065.70
Compile monthly data [k]	16	12	192	111	21,312	1,065.6	2,131.2	$2,399,475.46
Enter/verify information for quarterly/ semiannual reports [l]	8	2	16	111	1,776	88.8	177.6	$199,956.29
G. Time to train personnel [m]	40	1	40	1	40	2	4	$4,503.52
H. Time for refresher training for personnel [n]	16	1	16	111	1,776	88.8	177.6	$199,956.29
Subtotal for Recordkeeping Requirements					**123,727.4**			**$12,113,230.33**
TOTAL LABOR BURDEN AND COST					**126,207**			**$12,355,970.06**

Assumptions:

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

[b] This ICR uses the following labor rates: $128.02 per hour for Executive, Administrative, and Managerial labor; $101.05 per hour for Technical labor, and $51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, Table 2. Civilian Workers, by Occupational and Industry groups. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that one existing kraft pulp mills will install one new recovery furnace and smelt dissolving tank (SDT) each year. We have assumed that it will take respondent 2 hours once per year to complete report.

[d] We have assumed that five percent of respondents will each take 16 hours four times per year to complete reports of monitoring exceedances and periods of noncompliance. We have assumed that 95 percent of respondents will each take 8 hours two times per year to write reports of no exceedances.

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

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

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

[h] We have assumed that each respondent will take 1.5 hours 52 times per year to accomplish the task.

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

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

[k] We have assumed that each respondent will take 16 hours once per month to compile data.

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

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

[n] We have assumed that it will take each respondent 16 hours to provide refresher training for personnel.

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year [b]	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [a]
Report review								
Notification of construction/reconstruction [c]	2	1	2	1	2	0.1	0.2	$104.68
Notification of actual startup [c]	2	1	2	1	2	0.1	0.2	$104.68
Notification of applicability [c]	2	1	2	1	2	0.1	0.2	$104.68
Notification of initial performance test [c]	2	1	2	1	2	0.1	0.2	$104.68
Notification of performance evaluation [c]	2	1	2	1	2	0.1	0.2	$104.68
Review of notification of compliance status [d]	4	1	4	1	4	0.2	0.4	$209.36
Review of excess emissions report								
Quarterly reports of monitoring exceedances and periods of noncompliance [e]	8	4	32	6	192	9.6	19.2	$10,049.28
Semiannual reports of no exceedances [f]	2	2	4	105	420	21	42	$21,982.80
TOTAL ANNUAL BURDEN AND COST (rounded)					**720**			**$32,765**

Assumptions:

[a] This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: $62.90 Managerial rate (GS-13, Step 5, $39.31 x 1.6), $46.67 Technical rate (GS-12, Step 1, $29.17 x 1.6), and $25.25 Clerical rate (GS-6, Step 3, $15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

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

[c] We have assumed that it will take respondent 2 hours once per year to complete report review.
[d] We have assumed that it will take respondent 4 hours once per year to review the compliance status report.
[e] We have assumed that five percent of respondents (5% x 111 = 6) will each take 8 hours four times per year to review the monitoring exceedances and periods of noncompliance report.
[f] We have assumed that 95 percent of respondents (95% x 111 = 105) will each take 2 hours two times per year to review the no exceedances report.