

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

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

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa) (Renewal), EPA ICR Number 2485.02, OMB control number is 2060-0690.

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa) were proposed on May 23, 2013, and promulgated on April 4, 2014. These regulations apply to emissions of particulate matter (PM) and total reduced sulfur (TRS) at recovery furnaces, smelt dissolving tanks (SDTs), lime kilns, digester systems, brown stock washer (BSW) systems, multiple effect evaporator systems and condensate stripper systems at kraft pulp mills that commenced construction, modification or reconstruction after May 23, 2013. 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. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BBa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least two years following the generation date of such 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.

All of the kraft pulp mills in the United States are owned and operated by the kraft pulp mill industry (aka: the "Affected Public"). None of the facilities in the United States are owned

by either state, local, or tribal governments or by the Federal government; all these facilities are privately-owned, commercial businesses. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost - NSPS 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 for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

Over the next three years, approximately 10 respondents per year will be subject to these standards, and that an average of 2 existing mills (that were previously subject to 40 CFR Part 60, Subpart BB) per year will replace aging emission units with new emission units that will be subject to Subpart BBa.

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

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (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)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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

### **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 standards. Continuous emission monitors are used to ensure compliance with these 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 these 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 that these same 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. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart BBa.

#### **3(a) Non-duplication**

If the subject standard has 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, duplication does not exist.

### **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 (81 FR 29646) on May 3, 2016. No comments were received on the burden published in the Federal Register.

### **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 Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the American Forest and Paper Association (AF&PA), at (202)-463-2700; and 2) the National Paper Trade Association (NPTA), at [lchecea@gonpta.com](mailto:lchecea@gonpta.com) or (312)-321-4092.

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 these 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.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made

will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in these standards 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 kraft pulp mills constructed, modified or reconstructed after May 23, 2013. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2611, which corresponds to the North American Industry Classification System (NAICS) 3221 for Pulp, Paper, and Paperboard Mills.

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

A source must make the following reports:

<b>Notifications/Reports</b>	
Notification of construction or reconstruction	60.7(a)(1)
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 <sup>a</sup>	60.13(c), 60.288a(c)
Semiannual report	60.7(c), 60.288a(a)

<b>Notifications/Reports</b>	
Excess emissions/monitoring systems report	60.7(c), 60.288a(a)
Malfunction report	60.288a(d)
Affirmative defense report	60.286a(b)

<sup>a</sup> EPA's Electronic Reporting Tool (ERT) does not currently support reporting of TRS CEMS RATA.

A source must keep the following records:

<b>Recordkeeping</b>	
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

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.

These standards require that respondents submit electronic copies of certain required performance test reports through CDX using the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The CDX is the EPA's portal for submittal of electronic data using the EPA-provided electronic reporting tool (ERT) to generate electronic reports of performance tests and evaluations. The ERT generates an electronic report package that will be submitted using the CEDRI. The submitted report package will be stored in the CDX archive (the official copy of record) and the EPA's public database called WebFIRE. For any performance test conducted using test methods that are not listed on the ERT website the written report must be submitted to the Administrator at the appropriate address listed in §60.4.<sup>1</sup>

### **(ii) Respondent Activities**

<sup>1</sup> As of February 2017, 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.

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial and repeat (every 5 years) performance test, Reference Methods 5, 9, 16 (or 16A, 16B, 16C) and 202 test, 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.

## **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:

<b>Agency Activities</b>
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.

<b>Agency Activities</b>
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Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.
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### **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 standards, 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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 two 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 these regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS 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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 3,950 hours (Total Labor Hours from Table 1 below). 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, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 these subject standards 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 these regulations. 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**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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	10	\$86,000
TRS monitor	\$108,000	2	\$216,000	\$23,000	10	\$230,000
ESP voltage and current monitors	\$31,000	2	\$62,000	\$4,200	10	\$42,000
Scrubber pressure drop monitor <sup>a</sup>	\$350	2	\$700	\$70	10	\$700
Scrubber liquid flow rate monitor <sup>a</sup>	\$15,500	2	\$31,000	\$3,100	10	\$31,000
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) <sup>b</sup>	N/A			\$6,800	2	\$13,600
Repeat Method 16, 16A, 16B or 16C for TRS (every 5 years) <sup>b</sup>	N/A			\$3,000	2	\$6,000
<b>Total <sup>c</sup></b>			<b>\$411,000</b>			<b>\$409,000</b>
<b>Total capital and O&amp;M cost <sup>c</sup></b>						<b>\$821,000</b>

<sup>a</sup> Scrubber monitor O&M costs were estimated as 20 percent of the initial monitor cost.

<sup>b</sup> Repeat tests are required in 5-year intervals. Starting in year 2 of this ICR, 2 respondents per year will be required to conduct repeat performance tests.

<sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$411,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$409,000. 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 \$821,000. These are the 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 \$21,600.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

#### 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 8 existing respondents will be subject to these standards. It is estimated that an additional 2 respondents (that were previously subject to 40 CFR Part 60, Subpart BB) per year will become subject by replacing aging emission units with new emission units subject to Subpart BBa. The overall average number of respondents, as shown in the table below, is 10 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 <sup>1</sup>	(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	2	6	0	0	8
2	2	8	0	0	10
3	2	10	0	0	12
Average	2	8	0	0	10

<sup>1</sup> 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 10.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	2	1	0	2
Notification of performance test <sup>a</sup>	4	1.2	0	4.8
Notification of actual startup	2	1	0	2
Notification of CMS demonstration	2	1	0	2
Notification of physical or operational changes	2	1	0	2
Notification of opacity observations	2	1	0	2
Report of performance test (including submittal through EPA's ERT) <sup>a</sup>	4	1.2	0	4.8
Semiannual report	10	2	0	20
Excess emissions/monitoring systems report	10	2	0	20
			<b>Total</b>	<b>59.6</b>

<sup>a</sup> We assume that there are 2 new respondents each year and that 2 existing respondents will have to complete the 5-year repeat performance tests starting in year 2 of this ICR for a total of 4 respondents subject to performance testing per year. We also assume that 20% of respondents will have to repeat a performance test due to failure.

The number of Total Annual Responses is 60 (rounded).

The total annual labor costs are \$408,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

### **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 below in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 3,950 hours at a cost of \$408,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 66 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$821,000. 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 465 labor hours at a cost of \$21,600. See below in Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is an adjustment increase in the total estimated burden and labor costs as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred for two reasons. First, this ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year. Second, the burden has increased due an increase in the estimated number of sources subject to the standard.

There is also an increase in the total capital and O&M costs as currently identified in the OMB Inventory of Approved Burdens. This increase is due to an increase in the estimated number of sources, and because in year 2 of this ICR existing sources will need to repeat performance tests that are required every 5 years.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 66 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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-2014-0034. 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), WJC 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) 566-1752. 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-2014-0034 and OMB Control Number 2060-0690 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 – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BBa) (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence <sup>e</sup>	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total cost per year <sup>b</sup>
1. Applications	N/A							
2. Survey and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	30	1	30	10	300	15	30	\$35,594.55
B. Required activities								
Initial performance tests <sup>d</sup>	80	1	80	2	160	8	16	\$18,983.76
5-year repeat performance tests <sup>d,e</sup>	80	1	80	2	160	8	16	\$18,984
Repeated performance tests due to failure <sup>d,f</sup>	80	0.2	16	4	64	3.2	6.4	\$7,593.50
C. Gather existing information	See 3B							
D. Write report								
Notification of construction/reconstruction	2	1	2	2	4	0.2	0.4	\$474.59
Notification of performance test <sup>f</sup>	2	1.2	2.4	4	9.6	0.48	0.96	\$1,139.03
Notification of actual startup	2	1	2	2	4	0.2	0.4	\$474.59
Notification of CMS demonstration	2	1	2	2	4	0.2	0.4	\$474.59
Notification of physical or operational changes	2	1	2	2	4	0.2	0.4	\$474.59
Notification of opacity observations	2	1	2	2	4	0.2	0.4	\$474.59
Report of performance test (including submittal through EPA's	4	1.2	4.8	4	19.2	0.96	1.92	\$2,278.05

ERT) <sup>f, g</sup>								
Semiannual report <sup>h, i</sup>	8	2	16	10	160	8	16	\$18,983.76
Excess emissions/monitoring systems report <sup>i, j</sup>	20	2	40	10	400	20	40	\$47,459.40
Malfunction report (affirmative defense) <sup>k</sup>	30	2	60	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>1,487</b>		<b>\$153,389</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system <sup>l</sup>	40	1	40	2	80	4	8	\$9,491.88
E. Time to enter and transmit information								
Records of monitoring data <sup>m</sup>	0.5	365	182.5	10	1,825	91.25	182.5	\$216,533.51
Records of malfunctions	2	12	24	10	240	12	24	\$28,475.64
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,467</b>		<b>\$254,501</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>n</sup></b>						<b>3,950</b>		<b>\$408,000</b>
<b>CAPITAL AND O&amp;M COST (rounded)<sup>n</sup></b>								<b>\$821,000</b>
<b>GRAND TOTAL (rounded)<sup>n</sup></b>								<b>\$1,230,000</b>

**Assumptions:**

<sup>a</sup> We assume an average of 10 mills per year will be subject to the rule and that an average of 2 existing mills (that were previously subject to 40 CFR Part 60, Subpart BB) per year will replace aging emission units with new emission units subject to Subpart BBa.

<sup>b</sup> This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 per hour for Technical labor, and \$52.77 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "Table 2. Civilian Workers, by occupational and industry group," September 2015. 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.

<sup>c</sup> We assume that each respondent will have to familiarize with the regulatory requirements each year.

<sup>d</sup> We assume it will take 80 hours for each respondent to coordinate the performance tests for PM, CPM, opacity and TRS. Testing contractor costs are included in the capital/startup and O&M costs.

- <sup>e</sup> Repeat performance tests are required in 5-year intervals. Starting in year 2 of this ICR, 2 respondents per year will be required to conduct repeat performance tests.
- <sup>f</sup> We assume that 20 percent of respondents would repeat a performance test due to failure.
- <sup>g</sup> 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.
- <sup>h</sup> Assumes that it will take each respondent 8 hours to complete the semiannual report.
- <sup>i</sup> Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods. Year 1 = 8, Year 2 = 8+2 = 10, Year 3 = 10+2+2 = 12. Average(8,10,12) = 10 respondents.
- <sup>j</sup> We assume each respondents will take 20 hours two times per year to review monitoring data (e.g., to document compliance with allowances) and complete the excess emissions report.
- <sup>k</sup> Not applicable.
- <sup>l</sup> 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.
- <sup>m</sup> We assume 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).
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence <sup>e</sup>	No. of occurrences per plant per year	EPA person-hours per plant per year (C=A×B)	Plants per year <sup>a</sup>	Technical person-hours per year (E=C×D)	Management person-hours per year (F=E×0.05)	Clerical person-hours per year (G=E×0.1)	Cost <sup>b</sup>
1. Attend initial performance test <sup>c</sup>	24	1	24	2	48	2.4	4.8	\$2,563.49
2. Attend 5-year repeat performance test <sup>c,d</sup>	24	1	24	2	48	2.4	4.8	\$2,563.49
3. Attend repeat performance test due to failure <sup>c,e</sup>	24	0.2	4.8	4	19.2	0.96	1.92	\$1,025.40
4. Report review								
Review notification of construction/reconstruction	2	1	2	2	4	0.2	0.4	\$213.62
Review notification of performance test <sup>e</sup>	0.5	1.2	0.6	4	2.4	0.12	0.24	\$128.17
Review notification of actual startup	0.5	1	0.5	2	1	0.05	0.1	\$53.41
Review notification of CMS demonstration	0.5	1	0.5	2	1	0.05	0.1	\$53.41
Review notification of physical/operational changes	0.5	1	0.5	2	1	0.05	0.1	\$53.41
Review notification of opacity observations	0.5	1	0.5	2	1	0.05	0.1	\$53.41
Review performance test reports <sup>e</sup>	8	1.2	9.6	4	38.4	1.92	3.84	\$2,050.79
Review semiannual report <sup>f,g</sup>	4	2	8	10	80	4	8	\$4,272.48
Review excess emissions/monitoring systems report <sup>f,g</sup>	8	2	16	10	160	8	16	\$8,544.96
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>h</sup></b>						<b>465</b>		<b>\$21,600</b>

**Assumptions:**

<sup>a</sup> We assume an average of 10 mills per year will be subject to the rule and that an average of 2 existing mills (that were previously subject to 40 CFR Part 60, Subpart BB) per year will replace aging emission units with new emission units subject to Subpart BBa.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 for

Managerial (GS-13, Step 5, \$40.10 x 1.6), \$47.62 for Technical (GS-12, Step 1, \$29.76 x 1.6) and \$25.76 Clerical (GS-6, Step 3, \$16.10 x 1.6). These rates are from the Office of Personnel Management (OPM) “2016 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We assume that it will take EPA personnel 24 hours to attend each performance test.

<sup>d</sup> Repeat performance tests are required in 5-year intervals. Starting in year 2 of this ICR, 2 respondents per year will be required to conduct repeat performance tests.

<sup>e</sup> We assume that 20 percent of respondents would repeat a performance test due to failure.

<sup>f</sup> We assume 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.

<sup>g</sup> Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods. Year 1 = 8, Year 2 = 8+2 = 10, Year 3 = 10+2+2 = 12. Average(8,10,12) = 10 respondents.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.