

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD)  
(Proposed Rule)**

**1. Identification of the Information Collection**

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

NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD), EPA ICR Number 1984.07, OMB Control Number 2060-0552

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Products (40 CFR Part 63 Subpart DDDD) were proposed on January 9, 2003, promulgated on July 30, 2004, and most-recently amended on October 29, 2007. These regulations apply to both new and existing plywood and composite wood products (PCWP) facilities that are a major source of hazardous air pollutants (HAP). A PCWP manufacturing facility is a major source of HAP emissions either in and of itself, or because it is located with other major sources of HAP. Plywood and composite products include: plywood; veneer; particleboard; oriented strand board; hardboard; fiberboard; medium density fiberboard; laminated strand lumber; laminated veneer lumber; wood I-joists; kiln-dried lumber; and glue-laminated beams. New facilities include those that commenced construction, or reconstruction after January 9, 2003. This information is being collected to assure compliance with 40 CFR Part 63, Subpart DDDD.

In general, all NESHAP require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. Affected facilities are also required to maintain records of the operation of an affected facility or any period during which the monitoring system is inoperative. The 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 40 CFR part 63 must maintain a file containing the required reports and records and retain the file for at least five years following the generation date of the 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.

The Plywood and Composite Products (PCWP) NESHAP currently contains emissions limits (compliance options), operating requirements, and work practices for PCWP facilities. Lumber facilities that produce kiln-dried lumber and are major sources of HAP are also subject to the NESHAP but have no requirements other than submittal of an initial notification. The EPA is amending the PCWP NESHAP as part of the residual risk and technology review (RTR) required under Clean Air Act sections 112(f)(2) and 112(d)(6). The proposed amendments to the rule eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan

requirement; add periodic emissions testing; add electronic submittal of notifications, semiannual reports, and performance test reports; and make technical and editorial changes. The remaining portions of the NESHAP remain unchanged. This supporting statement reflects the burden associated with the rule once it is amended. The amended rule resulting from the RTR will not alter the requirements for lumber facilities subject to the PCWP NESHAP.

Over the next three years, approximately 244 respondents per year will be subject to these standards, including 243 existing respondents per year and an average of 1 additional respondent per year that becomes subject to these same standards. See section 6(d) for details.

Nearly all of the PCWP facilities in the United States are owned and operated by the plywood and composite industry (aka: the “Affected Public”). With one exception, none of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. One lumber facility is owned by a tribal government. We assume that they will all respond to EPA inquiries. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments).

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**

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator’s judgment, HAP emissions from PCWP facilities which include acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart DDDD in 2004.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section

112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

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 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.

## **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these 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 capability to comply with the emission standards. Continuous emission or continuous parameter 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 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 and the standard is 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. This supporting statement reflects the informational needs under CAA authority identified above and accounts for both public and government burdens for the required actions.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart DDDD.

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

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted 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**

The ICR will be available for public review during the public comment period following publication of the proposed Subpart DDDD RTR in the Federal Register.

#### **3(c) Consultations**

Stakeholder outreach occurred with industry groups including American Wood Council (AWC), National Council for Air and Stream Improvement (NCASI), Composite Panel Association (CPA), Southeastern Lumber manufacturer's Association (SLMA) and the Harwood Plywood and Veneer Association (HPVA) and member companies of these organizations. Further stakeholder and public input is expected through public comment and follow-up meetings with interested stakeholders.

In addition, in 2017 the EPA/OAQPS conducted an ICR, concluding in 2018, to gather process and emissions data from the PCWP industry for rulemaking purposes (referred to as the "2017/2018 ICR"). The results from this ICR were used in updating the burden estimates contained in this supporting statement.

#### **3(d) Effects of Less Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet 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.

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 with 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 (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/NAICS Codes**

The respondents to the recordkeeping and reporting requirements are PCWP facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding to the North American Industry Classification System (NAICS) codes are listed in the table below.

<b>Standard (40 CFR Part 63, Subpart DDDD)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
All Other Miscellaneous Wood Product Manufacturing (including sawmills with lumber kilns)	2421, 2429, 2499, 2517, 3131, 3999	321999

Hardwood Veneer and Plywood Manufacturing	2435	321211
Softwood Veneer and Plywood Manufacturing	2436	321212
Reconstituted Wood Product Manufacturing	2493	321219
Engineered Wood Member (except truss) Manufacturing	2439	321213

#### 4(b) Information Requested

##### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD). Subpart DDDD references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following reports:

<b>Notifications and Reports</b>	
Initial notification for existing sources	63.9(b)(2), 63.2280(a)-(b)
Notification of construction/reconstruction	63.9(b)(4)-(5), 63.2280(a)
Notification that source is subject to special compliance requirements	63.9(d), 63.2280(a)
Notification of performance test	63.7(b)(1), 63.9(e), 63.2280(a), (c)
Notification of compliance status (including performance test reports)	63.9(h)(2)(ii), 63.2280(a) & (d), 63.2281
Request for routine control device maintenance exemption	63.2280(e)
Emissions averaging plan	63.2280(f)
Notification of change of control system, processing unit in your emissions averaging plan, monitoring parameter, or value of a monitoring parameter	63.2280(g)
Semiannual compliance report	63.2281

A source must keep the following records:

<b>Recordkeeping</b>	
Documentation supporting any initial notification or notification of compliance status	63.10(b)(2)(xiv), 63.2282(a)(1)
Records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions	63.6(e)(3)(iii)-(v), 63.2282(a)(2)
Records relating to control device maintenance and documentation of routine control device maintenance exemption actions	63.2282(a)(3)
Records of performance test and performance evaluations	63.10(b)(2)(viii), 63.2282(a)(4)
Records for each CEMS for emission limitations and records related to the work practice requirements	63.10(b)(2)(vi)-(xi), 63.8(f)(6)(i), 63.2282(b)-(c)
Records of all information required to calculate emission debits and credits	63.2282(d)
Records of catalytic oxidizer catalyst activity checks	63.2282(e)
Records of CMS quality control procedures	63.2282(f)
Maintain records for 5 years	63.10(b)(1), 63.2283(b)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data (e.g., continuous control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern 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. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT.<sup>1</sup> Respondents would also be required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

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

<b>Respondent Activities</b>

<sup>1</sup> As of 2018, Methods 1-5, 25A, and 0011 are the test methods referenced in subpart DDDD that are included in the ERT. Method 320 and the NCASI methods incorporated into the PCWP rule are not yet supported by the ERT.

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS.
Conduct initial performance 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.

## **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 and, if necessary, retests.
Review reports, including performance test reports and semiannual compliance reports, required to be submitted by industry.
Review notifications, including notifications of construction/reconstruction, actual startup, applicability of standard, performance test, performance evaluation, and compliance status.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO).

### **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 entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

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. Approximately 12 percent of the facilities subject to the PCWP NESHAP are owned by companies that are small businesses. Many of these small businesses are kiln-dried lumber producers that are currently only required to submit an initial notification under the PCWP NESHAP. 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 – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments).

### **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for 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 39,700 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 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:

<b>Civilian Worker Rates</b>	<b>Labor Rates, \$/hr</b>	<b>Total including 110% overhead, \$/hr</b>
Managerial	\$70.94	\$148.97
Technical	\$56.68	\$119.03
Clerical	\$27.44	\$57.62

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2018, “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.

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.

### (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standards are both labor costs (which are addressed elsewhere in this ICR) and the costs associated with continuous monitoring, performance testing, and other compliance activities. 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 monitor(s) 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) Cost Item	(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 <sup>1</sup>	(G) Total O&M, (E X F)
Continuous monitoring system	\$2,240	7	\$15,680	\$84	114	\$9,525
Initial tests at new mills (inlet/outlet)	\$60,000 <sup>2</sup>	2	\$120,000			\$0
Initial tests on new process lines at existing mills (inlet/outlet)	\$30,000 <sup>2</sup>	5	\$150,000			\$0
Repeat tests (inlet/outlet)	\$60,000 <sup>2</sup>	113	\$6,780,000			\$0
<b>Totals</b>			<b>\$7,066,000</b>			<b>\$10,000</b>
<b>Average capital/ startup + O&amp;M cost for 3-year period</b>						<b>\$2,365,000<sup>3</sup></b>

Note: Totals have been rounded to 4 significant figures. Figures may not add exactly due to rounding.

<sup>1</sup> Based on average number of PCWP facility respondents over the 3-year period  $(113 + 113 + (113 \times 2)) / 3 = 114$ . Annual O&M costs are not currently required in the rule for lumber mills.

<sup>2</sup> Estimated based on a test cost of \$30,000 for each inlet/outlet test for 2 emission points at each facility for a total of \$60,000 per facility (except 1 emission point is assumed for new process lines at existing facilities for a testing cost of \$30,000). Repeat tests are required every 2 years for processes controlled by biofilters and every 5 years for other HAP controls.

<sup>3</sup> Calculated as the column D total cost divided by 3 years plus the column G total annual cost.

The total capital/startup costs for this ICR are \$7,066,000. This is the total of column D in the above table.

The total annual operation and maintenance (O&M) costs for this ICR are \$10,000. 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 \$2,365,000. 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 such activities 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 \$62,300.

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

<b>Agency Worker Rates</b>	<b>Labor Rates, \$/hr <sup>1</sup></b>	<b>Total including 60% overhead, \$/hr</b>
Managerial (GS-13, step 5)	\$41.07	\$65.71
Technical (GS-12, step 1)	\$30.47	\$48.75
Clerical (GS-6, step 3)	\$16.49	\$26.38

<sup>1</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf)

These rates are from the Office of Personnel Management (OPM), 2018 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 Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments).

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(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 244 existing respondents will be subject to these standards. There are 113 existing PCWP facilities and 130 existing lumber mills subject to the PCWP NESHAP, for a total of 243 existing respondents.<sup>2</sup> Two new greenfield facilities (new respondents) are projected to come online during the three-year period and five new process lines are projected to be installed at existing facilities (existing respondents that are also new respondents). Thus, it is estimated that an average of two additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 244 per year. The average number of respondents is calculated using the following table that addresses the 3 years covered by this ICR.

Number of Respondents					
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	0	243	0	0	243
2	0	243	0	0	243
3	7	243	0	5	245
<b>Average</b>	<b>2</b>	<b>243</b>	<b>0</b>	<b>2</b>	<b>244</b>

<sup>1</sup> New respondents include sources that construct or reconstruct affected facilities during the ICR response period.

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 244.

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<sup>2</sup> These totals include 109 PCWP and 121 lumber facilities identified in the EPA's 2017/2018 ICR as being subject to the PCWP NESHAP, as well as 13 additional mills that were recently constructed (4 PCWP mills and 9 lumber mills) that are subject to the NESHAP.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity <sup>1</sup>	(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	15	1	0	15
Notification of anticipated startup	15	1	0	15
Notification of actual startup	15	1	0	15
Notification of applicability of standard (initial notification)	15	1	0	15
Emissions averaging plan	0	1	0	0
Request for routing control system maintenance exemption	2	1	0	2
Notification of performance test	40	1	0	40
Notification of compliance status with performance test	40	1	0	40
Notification of compliance status without performance test	2	1	0	2
Initial compliance report with no deviations	2	1	0	2
Initial compliance report with deviations	0	1	0	0
Initial compliance emissions averaging report	0	1	0	0
Semiannual report with no deviations	102	2	0	204
Semiannual report with deviations	11	2	0	22
Semiannual control system maintenance report	11	2	0	22
Semiannual emissions averaging report	1	2	0	2
<b>Total Number of Annual Responses</b>			<b>Total</b>	<b>396</b>

<sup>1</sup>Performance test results, selected notifications, and semiannual reports will be submitted electronically through CEDRI.

The number of Total Annual Responses is 396.

The total annual labor costs are \$4,560,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments).

## **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 39,700 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 106 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,365,000. 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 1310 labor hours at a cost of \$62,300. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments).

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

This ICR is prepared for amendments to the PCWP NESHAP (40 CFR, Part 63, Subpart DDDD). These amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart DDDD) to remove the SSM exemption and SSM plan requirement; (2) add repeat emissions testing; (3) add electronic submittal of selected notifications, semiannual reports, and performance test reports; and (4) make technical and editorial changes. Where applicable, adjustments for these amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected mills changed from the previous ICR renewal because of: (1) updated information from EPA's 2017/2018 ICR on the population of affected PCWP facilities which has decreased over time due to consolidation and product shifts within the PCWP sector; (2) updated information from EPA's 2017/2018 ICR on the population of kiln-dried lumber mills that are subject to the rule (but currently have no requirements beyond initial notification; and (3) updated projections of the number of new affected facilities with PCWP processes or lumber kilns developed for the RTR. Distinctions between PCWP mills and kiln-dried lumber mills that are subject to PCWP NESHAP were made when needed to reflect differences in the burden for the two types of facilities. In addition, the EPA's 2017/2018 ICR revealed that one mill uses the emissions averaging compliance option and prepares associated records and reports. Also, the number of facilities that expend time to enter information to adhere to recordkeeping

requirements was updated (increased) because this number was underestimated in the previous ICR.

In addition, the burden estimate for familiarizing with regulatory requirements was increased to reflect the actual time it would take industry to review the amended rule. Burden estimates were added for the industry to prepare for/attend performance tests and retests, report the results of the performance tests/retests through CEDRI using the ERT, and adjust existing data acquisition systems to include startup and shutdown periods and to transition to submission of selected notifications and semiannual reports through CEDRI. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports. In addition, the O&M costs were updated (increased) to include the startup cost for the initial and repeat performance tests, and to update the CMS costs to 2018 dollars.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 106 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-2013-0341. 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-2013-0341 and OMB Control Number 2060-0552 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 Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments)**

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) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=E $\times$ 0.05)	(G) Clerical person hours per year (G=E $\times$ 0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	244	244	12.2	24.4	\$32,267
1) Amendments pertaining to PCWP mills <sup>d</sup>	10	1	20	38	380	19	38	\$50,251
2) Amendments pertaining to lumber mills <sup>e</sup>	0	0	0	43	0	0	0	\$0.00
B. Required activities	N/A							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
1) Notification of construction/reconstruction <sup>f</sup>	2	1	2	15	30	1.5	3	\$3,967
2) Notification of anticipated startup <sup>f</sup>	2	1	2	15	30	1.5	3	\$3,967
3) Notification of actual startup <sup>f</sup>	2	1	2	15	30	1.5	3	\$3,967
4) Notification of applicability of standard (initial notification) <sup>f</sup>	2	1	2	15	30	1.5	3	\$3,967
5) Emissions averaging plan <sup>g</sup>	120	1	120	0	0	0	0	\$0
6) Request for routine control system maintenance exemption <sup>h</sup>	2	1	2	2	4	0.2	0.4	\$529
7) Notification of performance test <sup>i</sup>	2	1	2	40	80	4	8	\$10,579

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) Respondents per year <sup>a</sup>	(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 <sup>b</sup>
8) Notification of compliance status (electronically reported)								
a. With performance test <sup>i</sup>	80	1	80	40	3200	160	320	\$423,170
b. Without performance test <sup>j</sup>	60	1	60	2	120	6	12	\$15,869
9) Initial compliance report (electronically reported) <sup>l</sup>								
a. No deviations	2	1	2	2	4	0.2	0.4	\$529
b. Deviations	24	1	24	0	0	0	0	\$0
c. Control system maintenance report <sup>m</sup>	8	1	8	0	0	0	0	\$0
d. Emissions averaging report <sup>s</sup>	8	1	8	0	0	0	0	\$0
10) Semiannual compliance report (electronically reported) <sup>k</sup>								
a. No deviations <sup>n</sup>	8	2	16	102	1632	81.6	163	\$215,816
b. Deviation <sup>n</sup>	24	2	48	11	528	26.4	52.8	\$69,823
c. Control system maintenance report <sup>o</sup>	8	2	16	11	176	8.8	17.6	\$23,274
d. Emissions averaging report <sup>p</sup>	20	2	40	1	40	2	4	\$5,290
<b>Subtotal for Reporting Requirements</b>					<b>7,507</b>			<b>\$863,266</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system <sup>q</sup>	40	1	40	2	80	4.0	8.0	\$10,579
1) Adjustments to existing system	80	2	200	38	6080	304	608	\$804,022

<b>Burden Item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person hours per year (F=Ex0.05)</b>	<b>(G) Clerical person hours per year (G=Ex0.1)</b>	<b>(H) Total Cost per year <sup>b</sup></b>
for PCWP mills <sup>d</sup>								
2) Adjustments to existing system for lumber mills <sup>e</sup>	0	3	0	43	0	0	0	\$0
<b>E. Time to enter information</b>								
1) Records of continuous compliance for PCWP facilities <sup>f</sup>								
a. Record parameters/information	0.25	365	91.25	114	10403	520	1040	\$1,375,632
b. Compile data	24	2	48	114	5472	24	547	\$723,620
c. Enter/verify information for semiannual reports	16	2	32	114	3648	182	365	\$482,413
2) Records of control system maintenance	See 3E							
3) Records of emissions averaging credit/debts	See 3E							
F. Calibration of CMS <sup>g</sup>	16	1	16	114	1824	91.2	182	\$241,207
G. Time to train personnel <sup>h</sup>	40	1	40	2	80	4	8	\$10,579
H. Time to refresher training for personnel <sup>i</sup>	16	1	16	23	368	18.4	36.8	\$48,665
I. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>32,148</b>		<b>\$3,696,717</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>v</sup></b>						<b>39,700</b>		<b>\$4,560,000</b>
<b>CAPITAL AND O&amp;M COST (rounded) <sup>v</sup></b>								<b>\$2,365,000</b>
<b>GRAND TOTAL (rounded) <sup>v</sup></b>								<b>\$6,930,000</b>

**Assumptions:**

- a. The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including 243 existing respondents in years 1-3, plus 2 new respondents projected to become subject to the rule in year 3 for and average of  $244 = [243 \text{ (yr 1)} + 243 \text{ (yr 2)} + 245 \text{ (yr 3)}] / 3$ . Although subject to the rule, lumber mills are only required to submit an initial notification.
- b. This ICR uses the following labor rates: \$148.97 per hour for managerial labor; \$119.03 per hour for technical labor, and \$57.62 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2018, 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.
- c. We have assumed that all respondents will have to familiarize with the regulatory requirements each year.
- d. Includes time for PCWP mills to become familiar with the amended rule for an average of 38 mills per year over the ICR period [ $38 = 113 \text{ existing} + 2 \text{ new} / 3$ ]. (This one-time activity will discontinue in the next ICR renewal period.)
- e. Zero hours are included for this one-time activity because lumber facilities do not have any new requirements in the amended rule. The average number of lumber mills per year over the ICR period is 43 mills [ $43 = 130 / 3$ ]
- f. One-time activity for new sources projected to commence construction over the 3-year ICR period, including new PCWP mills (2), new PCWP process lines (5), and new lumber kilns (39) for an average of 15 affected sources per year. [ $(2 + 5 + 39) / 3 = 15$ ]
- g. We have assumed that no additional existing facilities will choose to change to the emission averaging compliance option in the future. New facilities are not allowed to use emissions averaging.
- h. We have assumed that each new PCWP mill respondent will submit a request for routine control device maintenance exemption. Note, this is a one-time activity for each respondent. Two new PCWP mills and 5 new process lines are projected over the 3-year ICR period for an average of  $(2 + 5) / 3 = 2$  new PCWP respondents per year.
- i. We have assumed that each new and existing PCWP respondent will conduct initial or repeat performance test(s) during the 3-year period. The notification of compliance status includes the report of the performance test(s). Lumber mills are not required to conduct performance tests.
- j. We have assumed that it will take new PCWP respondents 60 hours to submit a notification of compliance status without performance test(s).
- k. We have assumed that the respondents' compliance date is in the first half of the year, so respondents will submit one compliance report the first year that they start complying with the rule and two compliance reports the following year.
- l. We have assumed that 90 percent of new PCWP facilities submitting their initial compliance report will have no deviation, and 10 percent will have deviation. [ $0.9 \times 2 \text{ new PCWP mills} = 1$ ] and [ $0.1 \times 2 \text{ new PCWP mills} = 0$ ]
- m. We have assumed that 10 percent of the new PCWP facilities will submit control device maintenance report.
- n. We have assumed that 90 percent of PCWP facilities submitting their semiannual compliance report will have no deviation, and 10 percent will have deviation. [ $0.9 \times 113 \text{ existing PCWP mills} = 102$ ] and [ $0.1 \times 113 \text{ existing PCWP mills} = 11$ ]
- o. We have assumed that 10 percent of the existing PCWP facilities will submit control device maintenance report. [ $0.1 \times 113 \text{ PCWP mills} = 11$ ]
- p. One existing PCWP facility uses the emissions averaging compliance option.
- q. We have assumed that it will take each new PCWP respondent 40 hours to develop a record system for recording parameter monitoring information. [ $(2 \text{ new mills} + 5 \text{ new process lines}) / 3 = 2$ ]
- r. Records of continuous compliance includes, records of CMS data for emission limitations and various records for work practice standards.
- s. We have assumed that calibration of the CMS will require eight hours per year for each monitor, assuming two CMS per facility for a total of 16 hours per year.
- t. We have assumed that it will take 40 hours for personnel at newly affected PCWP facilities to be trained. [ $(2 \text{ new mills} + 5 \text{ new process lines}) / 3 = 2$ ]
- u. We have assumed that it will take 16 hours for personnel to complete refresher training and that 20 percent of the existing PCWP facilities will participate [113

x 20% = 23].

v. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Proposed Amendments)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Total Cost per year, \$ <sup>b</sup>
1. Attend performance test <sup>c</sup>	24	1	24	4	96	4.8	9.6	\$5,249
2. Report review								
A. Notification of construction/reconstruction <sup>d</sup>	2	1	2	15	30	1.5	3	\$1,640
B. Notification of anticipated startup <sup>d</sup>	2	1	2	15	30	1.5	3	\$1,640
C. Notification of actual startup <sup>d</sup>	2	1	2	15	30	1.5	3	\$1,640
D. Notification of applicability of standard (initial notification) <sup>d</sup>	2	1	2	15	30	1.5	3	\$1,640
E. Review of emissions averaging plan <sup>e</sup>	40	1	40	0	0	0	0	\$0
F. Review of request for routine control system maintenance exemption <sup>f</sup>	2	1	2	2	4	0.2	0.4	\$219
G. Notification of performance test <sup>g</sup>	1	1	1	40	40	2	4	\$2,187
H. Notification of compliance status								
1) With performance test <sup>h</sup>	8	1	8	40	320	16	32	\$17,496
2) Without performance test <sup>i</sup>	4	1	4	2	8	0.4	0.8	\$437
I. Review of initial compliance report <sup>j</sup>								
1) No deviations <sup>k</sup>	2	1	2	2	4	0.2	0.4	\$219
2) Deviations <sup>k</sup>	8	1	8	0	0	0	0	\$0
3) Control system maintenance report	2	1	2	0	0	0	0	\$0
4) Emissions averaging report <sup>e</sup>	8	1	8	0	0	0	0	\$0

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Total Cost per year, \$ <sup>b</sup>
J. Review of semiannual compliance report								
1) No deviations <sup>k</sup>	2	2	4	102	408	20.4	40.8	\$22,307
2) Deviations <sup>k</sup>	8	2	16	11	176	8.8	17.6	\$9,623
3) Control system maintenance report	2	2	4	11	44	2.2	4.4	\$2,406
4) Emissions averaging report <sup>e</sup>	8	2	16	1	16	0.8	1.6	\$875
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>l</sup></b>						<b>1310</b>		<b>\$62,300</b>

**Assumptions:**

- a. The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including 243 existing respondents in years 1-3, plus 2 new respondents projected to become subject to the rule in year 3 for and average of  $244 = [243 (\text{yr } 1) + 243 (\text{yr } 2) + 245 (\text{yr } 3)]/3$ . Although subject to the rule, lumber mills are only required to submit an initial notification.
- b. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$65.71 Managerial rate (GS-13, Step 5,  $\$41.07 \times 1.6$ ), \$48.75 Technical rate (GS-12, Step 1,  $\$30.47 \times 1.6$ ), and \$26.38 Clerical rate (GS-6, Step 3,  $\$16.49 \times 1.6$ ). These rates are from the Office of Personnel Management (OPM) 2018 General Schedule which excludes locality rates of pay.
- c. We estimate that it will take EPA personnel 24 hours to attend performance tests at 10% of facilities required to test ( $0.1 \times 117 \text{ facilities}/3 \text{ years} = 4$ ).
- d. One-time activity for new sources projected to commence construction over the 3-year ICR period, including new PCWP mills (2), new PCWP process lines (5), and new lumber kilns (39) for an average of 15 affected sources per year.  $[(2 + 5 + 39) / 3 = 15]$
- e. We have assumed that no additional existing facilities will choose to change to the emission averaging compliance option in the future. New facilities are not allowed to use emissions averaging.
- f. We have assumed that all new facilities will have submitted a request for routine control system maintenance exemption.
- g. We have assumed that it will take 1 hour to review the notification of performance test.
- h. We have assumed that each new and existing PCWP respondent will conduct initial or repeat performance test(s) during the 3-year period and submit a notification of compliance status that includes the report of the performance test(s). Lumber mills are not required to conduct performance tests.
- i. We have assumed that the average number of new affected sources per year will submit a notification of compliance status without performance test
- j. We have assumed that the facilities compliance date is in the first half of the year, so facilities will submit one compliance report the first year that they start complying with the rule and two compliance reports the years that follow.
- k. We have assumed that 90 percent of facilities will have no deviations, and 10 percent will have deviations



1. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.