

**Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Product**

| Burden Item  | (A)<br>Technical person-hours per occurrence | (B)<br>No. of occurrences per respondent per year | (C)<br>Technical person-hours per respondent per year (C=AxB) | (D)<br>Respondents per year <sup>a</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                                      |
| 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>d</sup>             | 2  | 1   | 2   | 15                                       |
| 2) Notification of anticipated startup <sup>d</sup>                      | 2  | 1   | 2   | 15                                       |
| 3) Notification of actual startup <sup>d</sup>                           | 2  | 1   | 2   | 15                                       |
| 4) Notification of applicability of standard <sup>d</sup>                | 2  | 1   | 2   | 15                                       |
| 5) Emissions averaging plan <sup>e</sup>                                 | 120  | 1   | 120   | 0  |
| 6) Request for routine control system maintenance exemption <sup>f</sup> | 2  | 1   | 2   | 2  |
| 7) Notification of initial performance test <sup>g</sup>                 | 2  | 1   | 2   | 2  |
| 8) Notification of compliance status                                     |  |   |   |  |
| a. With performance test <sup>g</sup>                                    | 80   | 1   | 80  | 2  |
| b. Without performance test <sup>h</sup>                                 | 60   | 1   | 60  | 0  |
| 9) Initial compliance report <sup>i</sup>                                |  |   |   |  |
| a. No deviations <sup>j</sup>  | 2  | 1   | 2   | 2  |
| b. Deviations <sup>j</sup>   | 24   | 1   | 24  | 0  |
| c. Startup, shutdown, malfunction report <sup>k</sup>                    | 8  | 1   | 8   | 0  |
| d. Control system maintenance report <sup>l</sup>                        | 8  | 1   | 8   | 0  |
| e. Emissions averaging report <sup>m</sup>                               | 8  | 1   | 8   | 0  |
| 10) Semiannual compliance reports <sup>i</sup>                           |  |   |   |  |
| a. No deviations <sup>j</sup>  | 8  | 2   | 16  | 102                                      |
| b. Deviation <sup>j</sup>  | 24   | 2   | 48  | 11                                       |
| c. Startup, shutdown, malfunction report <sup>k</sup>                    | 8  | 2   | 16  | 11                                       |
| d. Control system maintenance report <sup>l</sup>                        | 8  | 2   | 16  | 11                                       |
| e. Emissions averaging report <sup>m</sup>                               | 20   | 1   | 20  | 1  |
| <b>Subtotal for Reporting Requirements</b>                               |  |   |   |  |
| 4. Recordkeeping requirements  |  |   |   |  |
| A. Familiarize with regulatory requirements <sup>c</sup>                 | See 3A                                       |   |   |  |

|  |        |     |     |      |
|--|--------|-----|-----|------|
| B. Plan activities   | N/A    |     |     |      |
| C. Implement activities  | N/A    |     |     |      |
| D. Develop record system <sup>n</sup>                                | 40     | 1   | 40  | 2    |
| E. Develop startup, shutdown, malfunction plan <sup>o</sup>          | 100    | 1   | 100 | 2    |
| F. Time to enter information   |        |     |     |      |
| 1) Records of startup, shutdown, and malfunction <sup>k</sup>        | 1.5    | 52  | 78  | 11.3 |
| 2) Records of continuous compliance for PCWP facilities <sup>p</sup> |        |     |     |      |
| a. Record parameters /information                                    | 0.25   | 365 | 91  | 114  |
| b. Compile data  | 24     | 2   | 48  | 114  |
| c. Enter/verify information for semiannual reports                   | 16     | 2   | 32  | 114  |
| 3) Records of control system maintenance                             | See 3E |     |     |      |
| 4) Records of emissions averaging credit/debts                       | See 3E |     |     |      |
| G. Calibration of CMS <sup>q</sup>                                   | 16     | 1   | 16  | 114  |
| H. Time to train personnel <sup>r</sup>                              | 40     | 1   | 40  | 2    |
| I. Time to refresher training for personnel <sup>s</sup>             | 16     | 1   | 16  | 23   |
| J. Time for audits   | N/A    |     |     |      |
| <b>Subtotal for Recordkeeping Requirements</b>                       |        |     |     |      |
| <b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>           |        |     |     |      |
| <b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>         |        |     |     |      |
| <b>Grand Total (rounded) <sup>t</sup></b>                            |        |     |     |      |

#### Assumptions:

<sup>a</sup> The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including 24 projected to become subject to the rule in year 3 for an average of  $244 = [243 (\text{yr } 1) + 243 (\text{yr } 2) + 245 (\text{yr } 3)]/3$ . There are 114 PCWP facilities (113 existing + 1 new = 114). Although subject to the rule, lumber mills are only required to submit

<sup>b</sup> This ICR uses the following labor rates: \$148.97 per hour for managerial labor; \$119.03 per hour for technical labor, as reported by the United States Department of Labor, Bureau of Labor Statistics, September 2018, Table 2. Civilian Workers, by Occupational Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employees.

<sup>c</sup> This ICR assumes that all respondents will have to familiarize with the regulatory requirements each year.

<sup>d</sup> One-time activity for new sources projected to commence construction over the 3-year ICR period, including 2 new PCWP mills and 39 new lumber kilns at existing sawmills, for an average of 15 affected sources per year.  $[(2 + 5 + 39) / 3 = 15]$

<sup>e</sup> The one existing PCWP facility using the emissions averaging compliance option has already written and submitted its use emissions averaging.

<sup>f</sup> We have assumed that each new PCWP mill respondent will submit a request for routine control device maintenance every 2 years. 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 mills per year.

<sup>g</sup> We have assumed that each new PCWP facility will comply by conducting performance tests. 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. The notification of compliance status includes the report of performance tests.

<sup>h</sup> We have assumed that each new facility will comply by conducting performance test(s). The notification of compliance status includes the report of performance tests.

- <sup>i</sup> We have assumed that the respondents' compliance date is in the first half of the year, so respondents will submit one compliance report (semiannual compliance reports) the following year.
- <sup>j</sup> We have assumed that 90 percent of new and existing PCWP facilities will have no deviations, and 10 percent will have deviations. [0.9 x 113 existing PCWP mills = 102] and [0.1 x 113 existing PCWP mills = 11]
- <sup>k</sup> We have assumed that 10 percent of the PCWP facilities will report an action taken during startup, shutdown, malfunction, or repair.
- <sup>l</sup> We have assumed that 10 percent of the PCWP facilities will submit control system maintenance report.
- <sup>m</sup> We have assumed that one existing PCWP facility uses the emissions averaging compliance option. New PCWP facilities will not use this option.
- <sup>n</sup> We have assumed that it will take each new PCWP respondent 40 hours to develop a record system for recording parameters. [113 new mills x 2 = 226]
- <sup>o</sup> We have assumed that it will take each new PCWP respondent 80 hours to draft the startup, shutdown, malfunction plan.
- <sup>p</sup> Records of continuous compliance includes, records of CMS data for emission limitations and various records for workbooks for each facility during the three-year period of this ICR [(113 (yr 1) + 113 (yr 2) + 115 (yr 3))/3 = 114 (rounded)].
- <sup>q</sup> We have assumed that calibration of the CMS will require eight hours per year for each monitor, assuming two CMS per facility. [113 new mills x 2 = 226]
- <sup>r</sup> We have assumed that it will take 40 hours for each new personnel to be trained. [(2 new mills + 5 new process lines) / 1 = 7]
- <sup>s</sup> We have assumed that it will take 16 hours for personnel to complete refresher training and that 20 percent of the existing personnel will require refresher training. [113 existing mills x 0.2 = 22.6]
- <sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ts (40 CFR Part 63, Subpart DDDD) (Renewal)

| (E)<br>Technical<br>hours per year<br>(E=CxD) | (F)<br>Management<br>hours per year<br><br>(F=Ex0.05) | (G)<br>Clerical hours<br>per year<br><br>(G=Ex0.10) | (H)<br>Total cost per<br>year (\$) <sup>b</sup> |
|---|---|---|---|
|   |   |   |   |
|   |   |   |   |
|   |   |   |   |
| 244   | 12  | 24  | \$32,266.68                                     |
|   |   |   |   |
|   |   |   |   |
|   |   |   |   |
| 30  | 2   | 3   | \$3,967.22                                      |
| 30  | 2   | 3   | \$3,967.22                                      |
| 30  | 1.5   | 3   | \$3,967.22                                      |
| 30  | 2   | 3   | \$3,967.22                                      |
| 0   | 0   | 0   | \$0   |
| 4   | 0   | 0   | \$528.96  |
| 4   | 0   | 0   | \$528.96  |
|   |   |   |   |
| 160   | 8   | 16  | \$21,158.48                                     |
| 0   | 0   | 0   | \$0   |
|   |   |   |   |
| 4   | 0.2   | 0.4   | \$528.96  |
| 0   | 0   | 0   | \$0   |
| 0   | 0   | 0   | \$0   |
| 0   | 0   | 0   | \$0   |
| 0   | 0   | 0   | \$0   |
|   |   |   |   |
| 1,627   | 81  | 163   | \$215,181.74                                    |
| 542   | 27  | 54  | \$71,727.25                                     |
| 181   | 9   | 18  | \$23,909.08                                     |
| 181   | 9   | 18  | \$23,909.08                                     |
| 20  | 1   | 2   | \$2,644.81                                      |
| <b>3,550</b>                                  |   |   | <b>\$408,253</b>                                |
|   |   |   |   |
|   |   |   |   |

| Labor Rates |          |
|-------------|----------|
| Management  | \$148.97 |
| Technical   | \$119.03 |
| Clerical    | \$57.62  |

|               |     |      |                    |
|---------------|-----|------|--------------------|
|               |     |      |                    |
|               |     |      |                    |
| 80            | 4   | 8    | \$10,579.24        |
| 200           | 10  | 20   | \$26,448.10        |
|               |     |      |                    |
| 881.4         | 44  | 88   | \$116,556.78       |
|               |     |      |                    |
| 10,403        | 520 | 1040 | \$1,375,631.80     |
| 5,472         | 274 | 547  | \$723,620.02       |
| 3,648         | 182 | 365  | \$482,413.34       |
|               |     |      |                    |
|               |     |      |                    |
| 1,824         | 91  | 182  | \$241,206.67       |
| 80            | 4   | 8    | \$10,579.24        |
| 368           | 18  | 37   | \$48,664.50        |
|               |     |      |                    |
| <b>26,399</b> |     |      | <b>\$3,035,700</b> |
| <b>29,900</b> |     |      | <b>\$3,440,000</b> |
|               |     |      | <b>\$105,000</b>   |
|               |     |      | <b>\$3,550,000</b> |

43 existing respondents in years 1-3, plus 2 new respondents  
: 113 existing PCWP facilities and 130 existing lumber mills subject  
t each year ( $2/3=1$  (rounded)). Therefore, there will be an average of  
an initial notification.

nd \$57.62 per hour for Clerical labor. These rates are from the  
onal and Industry group. The rates are from column 1, Total  
oyed by private industry.

WP mills, 5 new PCWP process lines at existing PCPW mills, and

emissions averaging plan. New PCWP facilities are not allowed to

emption. Note, this is a one-time activity for each respondent. Two  
CWP respondents per year.

id 5 new process lines are projected over the 3-year ICR period for  
f the performance tests. Lumber mills are not required to conduct

e status includes the report of the performance test(s).

compliance report (initial compliance report) the first year that they

deviations.  $[0.9 \times 2 \text{ new PCWP mills} = 2]$  and  $[0.1 \times 2 \text{ new PCWP}$

ion that are not consistent with the SSMP.

ies are not allowed to use emissions averaging.

meter monitoring information.  $[(2 \text{ new mills} + 5 \text{ new process lines}) /$

], and another 20 hours to review/revisions, for a total of 100 hours.

practice standards. There are 113 existing PCWP and 2 new PCWP

er facility for a total of 16 hours per year.

3 = 2]

ng PCWP facilities will participate  $[114 \times 0.2 = 23]$ .

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite 1 (Renewal)**

| Burden Item  | (A)                      | (B)   | (C)                                       | (D)   |
|--|--------------------------|---|---|---|
|  | EPA Hours per Occurrence | Number of Occurrences Per Respondent Per Year | EPA Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> |
| 1. Attend performance test <sup>c</sup>  | 24                       | 1   | 24  | 2   |
| 2. Report review   |                          |   |   |   |
| A. Notification of construction/reconstruction <sup>d</sup>                        | 2                        | 1   | 2   | 15  |
| B. Notification of anticipated startup <sup>d</sup>                                | 2                        | 1   | 2   | 15  |
| C. Notification of actual startup <sup>d</sup>                                     | 2                        | 1   | 2   | 15  |
| D. Notification of applicability of standard (initial notification) <sup>d</sup>   | 2                        | 1   | 2   | 15  |
| E. Review of emissions averaging plan <sup>e</sup>                                 | 40                       | 1   | 40  | 0   |
| F. Review of request for routine control system maintenance exemption <sup>f</sup> | 2                        | 1   | 2   | 2   |
| G. Notification of performance test <sup>g</sup>                                   | 1                        | 1   | 1   | 2   |
| H. Notification of compliance status   |                          |   |   |   |
| 1) With performance test <sup>h</sup>  | 8                        | 1   | 8   | 2   |
| 2) Without performance test <sup>i</sup>   | 4                        | 1   | 4   | 0   |
| I. Review of initial compliance report <sup>j</sup>                                |                          |   |   |   |
| 1) No deviations <sup>k</sup>  | 2                        | 1   | 2   | 2   |
| 2) Deviations <sup>k</sup>   | 8                        | 1   | 8   | 0   |
| 3) Startup, shutdown, malfunction report <sup>l</sup>                              | 2                        | 1   | 2   | 0   |
| 4) Control system maintenance report <sup>m</sup>                                  | 2                        | 1   | 2   | 0   |
| 5) Emissions averaging report <sup>e</sup>   | 8                        | 1   | 8   | 0   |
| J. Review of semiannual compliance report  |                          |   |   |   |
| 1) No deviations <sup>k</sup>  | 2                        | 2   | 4   | 102   |
| 2) Deviations <sup>k</sup>   | 8                        | 2   | 16  | 11  |
| 3) Startup, shutdown, malfunction report <sup>l</sup>                              | 2                        | 2   | 4   | 11  |
| 4) Control system maintenance report <sup>m</sup>                                  | 2                        | 2   | 4   | 11  |
| 5) Emissions averaging report <sup>e</sup>   | 8                        | 2   | 16  | 1   |
| <b>TOTAL ANNUAL BURDEN AND COST(rounded) <sup>n</sup></b>                          |                          |   |   |   |

**Assumptions:**

<sup>a</sup> The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including respondents projected to become subject to the rule in year 3 for and average of 244 = [243 (yr 1)+ 243 (yr 2) + 24 130 existing lumber mills subject to the PCWP NESHAP. During the three-year period of this ICR, an average of (2/3=1 (rounded)). Therefore, there will be an average of 114 PCWP facilities (113 existing + 1 new = 114). Although submit an initial notification.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account rate (GS-13, Step 5, \$41.07 x 1.6), \$48.75 Technical rate (GS-12, Step 1, \$30.47 x 1.6), and \$26.38 Clerical rate (Office of Personnel Management (OPM) 2018 General Schedule which excludes locality rates of pay.

- <sup>c</sup> We estimate that it will take EPA personnel 24 hours to attend performance tests at new facilities (2 new PCWP the three-year period of this ICR (7 facilities/3 years = 2)).
- <sup>d</sup> One-time activity for new sources projected to commence construction over the 3-year ICR period, including 2 r lumber kilns at existing sawmills, for an average of 15 affected sources per year. [(2 + 5 + 39) /3 = 15]
- <sup>e</sup> We have assumed that one existing PCWP facility uses the emission averaging plan. New facilities are not allow
- <sup>f</sup> We have assumed that all new facilities will have submitted a request for routine control system maintenance ex
- <sup>g</sup> We have assumed that it will take one hour to review the notification of initial performance test.
- <sup>h</sup> We have assumed that all new facilities will conduct an initial performance test(s) and submit a notification of c performance test(s).
- <sup>i</sup> We have assumed that each new facility will comply by conducting performance test(s). The notification of com
- <sup>j</sup> We have assumed that the facilities compliance date is in the first half of the year, so facilities will submit one cc with the rule and two compliance reports the years that follow.
- <sup>k</sup> We have assumed that 90 percent of facilities (113 existing PCWP facilities x 0.9 = 102) will have no deviations
- <sup>l</sup> We have assumed the 10 percent of sources with deviations will report any action taken during a startup, shutdov
- <sup>m</sup> We have assumed the 10 percent of sources with deviations will prepare a control system maintenance report.
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Products (40 CFR Part 63, Subpart DDDD)**

| (E)                              | (F)   | (G)  | (H)                          |
|----------------------------------|---|--|------------------------------|
| Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=E $\times$ 0.05) | Clerical Hours Per Year (G=E $\times$ 0.1) | Total Costs, \$ <sup>b</sup> |
| 48                               | 2.4   | 4.8  | \$2,624.33                   |
|                                  |   |  |                              |
| 30                               | 1.5   | 3  | \$1,640.21                   |
| 30                               | 1.5   | 3  | \$1,640.21                   |
| 30                               | 1.5   | 3  | \$1,640.21                   |
| 30                               | 1.5   | 3  | \$1,640.21                   |
| 0                                | 0   | 0  | \$0                          |
| 4                                | 0.2   | 0.4  | \$218.69                     |
| 2                                | 0.1   | 0.2  | \$109.35                     |
|                                  |   |  |                              |
| 16                               | 0.8   | 1.6  | \$874.78                     |
| 0                                | 0   | 0  | \$0                          |
|                                  |   |  |                              |
| 4                                | 0.2   | 0.4  | \$218.69                     |
| 0                                | 0   | 0  | \$0                          |
| 0                                | 0   | 0  | \$0                          |
| 0                                | 0   | 0  | \$0                          |
| 0                                | 0   | 0  | \$0                          |
|                                  |   |  |                              |
| 406.8                            | 20.34   | 40.68                                      | \$22,241.18                  |
| 180.8                            | 9.04  | 18.08                                      | \$9,884.97                   |
| 45.2                             | 2.26  | 4.52                                       | \$2,471.24                   |
| 45.2                             | 2.26  | 4.52                                       | \$2,471.24                   |
| 16                               | 0.8   | 1.6  | \$875                        |
| <b>1,020</b>                     |   |  | <b>\$48,600</b>              |

| Labor Rates |         |
|-------------|---------|
| Management  | \$65.71 |
| Technical   | \$48.75 |
| Clerical    | \$26.38 |

adding 243 existing respondents in years 1-3, plus 2 new (yr 3)/3. There are 113 existing PCWP facilities and 1 new PCWP facility will become subject each year though subject to the rule, lumber mills are only required to

for government overhead expenses: \$65.71 Managerial (3S-6, Step 3, \$16.49 x 1.6). These rates are from the

mills, 5 new PCWP process lines) required to test during

new PCWP mills, 5 new PCWP process lines, and 39 new

red to use emissions averaging.

emption.

compliance status that includes the report of the

pliance status includes the report of the performance

compliance report the first year that they start complying

, and 10 percent ( $113 \times 0.1 = 11$ ) will have deviations

wn, or malfunction that are consistent with the SSMP.

| <b>Total Annual Responses</b>                              |                       |                     |  |
|--|-----------------------|---------------------|--|
| (A)  | (B)                   | (C)                 | (D)  |
| Information Collection Activity                            | Number of Respondents | Number of Responses | Number of Existing Respondents That Keep Records But Do Not Submit Reports |
| Notification of construction/reconstruction                | 15                    | 1                   | 0  |
| Notification of anticipated startup                        | 15                    | 1                   | 0  |
| Notification of actual startup                             | 15                    | 1                   | 0  |
| Notification of applicability of standard                  | 15                    | 1                   | 0  |
| Emissions averaging plan                                   | 0                     | 1                   | 0  |
| Request for routine control system maintenance exemption   | 2                     | 1                   | 0  |
| Notification of initial performance test                   | 2                     | 1                   | 0  |
| Notification of compliance status with performance test    | 2                     | 1                   | 0  |
| Notification of compliance status without performance test | 0                     | 1                   | 0  |
| Initial compliance report with no deviations               | 2                     | 1                   | 0  |
| Initial compliance report with deviations                  | 0                     | 1                   | 0  |
| Initial compliance startup, shutdown, malfunction report   | 0                     | 1                   | 0  |
| Initial compliance control system maintenance report       | 0                     | 1                   | 0  |
| Initial compliance emissions averaging report              | 0                     | 1                   | 0  |
| Semiannual report with no deviations                       | 102                   | 2                   | 0  |
| Semiannual report with deviations                          | 11                    | 2                   | 0  |
| Semiannual startup, shutdown, malfunction report           | 11                    | 2                   | 0  |
| Semiannual control system maintenance report               | 11                    | 2                   | 0  |
| Semiannual emissions averaging report                      | 1                     | 2                   | 0  |
|  |                       |                     | Total  |

| <b>Number of Respondents</b> |  |                                |  |
|------------------------------|--|--------------------------------|--|
|                              | Respondents That Submit Reports        |                                | Respondents That Do Not Submit Any Reports                                 |
|                              | (A)                                    | (B)                            | (C)  |
| Year                         | Number of New Respondents <sup>a</sup> | Number of Existing Respondents | Number of Existing Respondents that keep records but do not submit reports |
| 1                            | 0                                      | 243                            | 0  |

|         |   |     |   |
|---------|---|-----|---|
| 2       | 0 | 243 | 0 |
| 3       | 7 | 243 | 0 |
| Average | 2 | 243 | 0 |

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. The 7 new respondents include 7 greenfield PCWP facilities and 5 new process lines to be installed at existing PCWP facilities.

| <b>Capital/Startup vs. Operation and Maintenance (O&amp;M)</b>                   |   |                           |                                     |
|--|---|---------------------------|-------------------------------------|
| (A)  | (B)                                     | (C)                       | (D)                                 |
| Continuous Monitoring Device   | Capital/Startup Cost for One Respondent | Number of New Respondents | Total Capital/Startup Cost, (B X C) |
| Continuous monitoring system <sup>a</sup>  | \$2,240                                 | 7                         | \$15,680                            |
| Initial tests at new mills (inlet/outlet) <sup>b</sup>                           | \$60,000                                | 2                         | \$120,000                           |
| Initial tests on new process lines at existing mills (inlet/outlet) <sup>b</sup> | \$30,000                                | 5                         | \$150,000                           |
| <b>Total <sup>c</sup></b>  |   |                           | <b>\$286,000</b>                    |
| <b>Average capital/ startup + O&amp;M cost for 3-year period <sup>c, d</sup></b> |   |                           |                                     |

<sup>a</sup> Based on average number of PCWP facility respondents over the 3-year period  $(113 + 113 + (113+2)) / 3 = 114$ . rule for lumber mills.

<sup>b</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. Assumed for new process lines at existing facilities for a testing cost of \$30,000).

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

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

| No. of major sources   | Existing   | Under construction (existing for ICR purposes) | Projected over next 5 years |
|--|------------|--|-----------------------------|
| No. PCWP mills   | 109        | 4  | 2                           |
| PCWP mills also making lumber                                | 16         |  |                             |
| Projected PCWP lines added at existing mills                 |            |  | 7                           |
| No. sawmills with lumber kilns                               | 121        | 9  |                             |
| Projected batch kilns added at existing sawmills             |            |  | 25                          |
| Projected Continuous Drying Kilns added at existing sawmills |            |  | 40                          |
| <b>Total</b>   | <b>230</b> | <b>13</b>                                      |                             |
| Data source  | ICR        | New source proj                                | New source projectio        |

|                                     |
|-------------------------------------|
|                                     |
| (E)                                 |
| Total Annual Responses<br>E=(BxC)+D |
| 15                                  |
| 15                                  |
| 15                                  |
| 15                                  |
| 0                                   |
| 2                                   |
| 2                                   |
| 2                                   |
| 0                                   |
| 2                                   |
| 0                                   |
| 0                                   |
| 0                                   |
| 0                                   |
| 0                                   |
| 204                                 |
| 22                                  |
| 22                                  |
| 22                                  |
| 22                                  |
| 2                                   |
| 340                                 |

hours 29,900  
hr/response 88

|  |                                   |
|--|-----------------------------------|
|  |                                   |
|  |                                   |
| (D)  | (E)                               |
| Number of Existing Respondents That Are Also New Respondents | Number of Respondents (E=A+B+C-D) |
|  |                                   |
| 0  | 243                               |

|   |     |
|---|-----|
| 0 | 243 |
| 5 | 245 |
| 2 | 244 |

pondents in year 3 consist of 2 new

| <b>D) Costs</b>                     |                                |                   |
|-------------------------------------|--------------------------------|-------------------|
| (E)                                 | (F)                            | (G)               |
| Annual O&M Costs for One Respondent | Number of Respondents with O&M | Total O&M (E X F) |
| \$84                                | 114                            | \$9,576           |
|                                     |                                | \$0               |
|                                     |                                | \$0               |
|                                     |                                | <b>\$9,580</b>    |
|                                     |                                | <b>\$105,000</b>  |

Annual O&M costs are not currently required in the

of \$60,000 per facility (except 1 emission point is

|   |
|---|
| <b>Projected over 3-year ICR period</b> |
| 2                                       |
| 5                                       |
| 15                                      |
| 24                                      |
|   |
| ns memo                                 |

**Notes**

2 new OSB mills are projected, assuming 2 RTOs each

5 Projected line additions: MDF, PB, LVL, 2 SPW, 2 mills with SW veneer dryers. 7 RTOs p

rojected.