

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

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

**1. Identification of the Information Collection**

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

NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal), EPA ICR Number 1055.13, OMB Control Number 2060-0021.

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

The New Source Performance Standards (NSPS) for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) were proposed on September 24, 1976, and promulgated on February 23, 1978. These regulations apply to the following facilities at existing kraft pulp mills that either commenced construction, reconstruction, or modification after September 24, 1976 and on or before May 23, 2013: recovery furnaces, smelt dissolving tanks, lime kilns, digester systems, brown stock washer systems, black liquor oxidation systems, multiple effect evaporator systems and condensate stripper systems. In 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 facility is produced by the kraft pulping operation. Facilities may be exempt from the total reduced sulfur (TRS) standard if the facility can demonstrate that TRS emissions from a new, modified, or reconstructed brown stock washer can be neither technically nor economically feasible to control. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BB. New facilities that commenced construction, modification or reconstruction after May 23, 2013 are subject to regulation under 40 CFR Part 60 Subpart BBa. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BB.

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 this 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. If 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 “Affected Public” are kraft pulp mills. The burden to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal). The burden to the “Federal

Government” is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal). There are approximately 97 kraft pulp mills, which are owned and operated by the kraft pulp mills industry. None of the 97 facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 97 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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, particulate matter (PM) and total reduced sulfur (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 BB.

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

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

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 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 BB.

### **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**

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (86 FR 8634) on February 8, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

### **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 these standards, 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. Approximately 97 respondents will be subject to these standards over the three-year period covered by this ICR.

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 these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Paper Trade Association, at (312) 321-4092, and the American Forest and Paper Association, at (202) 463-2588.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, we received comments from the American Forest and Paper Association indicating that no significant changes were needed to the burden estimates in the currently-approved ICR.

### **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. 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) code 322110 for Pulp Mills.

**4(b) Information Requested**

**(i) Data Items**

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

A source must make the following reports:

<b>Notifications</b>	
Notification of construction or reconstruction	§60.7(a)(1), §60.15
Notification of actual startup	§60.7(a)(3)
Notification of initial performance test	§60.8(d)
Initial performance test results	§60.8(a)
Demonstration of continuous system performance	§60.7(a)(5)
Physical or operational changes	§60.7(a)(4)
Opacity or visible emissions observations	§60.7(a)(6)

<b>Reports</b>	
Semiannual report	§60.7(c), §60.284(d)
Excess emissions report	§60.7(c), §60.284(d)

A source must keep the following records:

<b>Recordkeeping</b>	
Startup, shutdown, or malfunction period where the continuous monitoring system is inoperative	§60.7(b)
Record continuous monitoring system parameter data	§§60.284(a)-(c)
Maintain and retain files for at least two 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.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate a continuous monitoring system (CMS) to monitor and record opacity of gases discharged from any recovery furnace; the concentration of TRS emissions on a dry basis and the percent of oxygen by volume in the gases discharged from any lime kiln, recovery furnace, digester system, brown stock washer system, multi-effect evaporator system or condensate stripper system; the combustion temperature at the point of incineration of effluent gases which are emitted from a digester system; the scrubbing liquid supply pressure and pressure loss of the gas stream to the scrubber emission control device that is discharged from any lime kiln or smelt dissolving tank.
Perform initial performance test, Reference Method 2, 3B, 5, 9, 16, 16A, 16B, and 17 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.

<b>Respondent Activities</b>
Transmit, or otherwise disclose the information.

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

**5(a) Agency Activities**

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

<b>Agency Activities</b>
Review notifications, semiannual reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

**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. The EPA uses ICIS 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.

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 the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

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

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may 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 13,900 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)
Clerical	\$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account



for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject 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 <sup>a</sup>	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent <sup>a</sup>	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Opacity monitor	\$45,695	0	\$0	\$9,824	97	\$952,960
TRS monitor	\$123,375	0	\$0	\$26,274	97	\$2,548,615
Incinerator temperature monitor	\$9,824	0	\$0	\$5,255	97	\$509,723
Scrubber liquid supply pressure monitor	\$400	0	\$0	\$0	0	\$0
Scrubber liquid flow rate monitor	\$17,707	0	\$0	\$0	0	\$0
<b>Total <sup>b</sup></b>			<b>\$0</b>			<b>\$4,010,000</b>

<sup>a</sup> Capital/Startup and Annual O&M costs have been updated from 2009 to 2020 using the CEPCI Index.

<sup>b</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 \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$4,010,000. 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 \$4,010,000. 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. The 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 \$44,600.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 97 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 97 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>a</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	97	0	0	97
2	0	97	0	0	97
3	0	97	0	0	97
Average	0	97	0	0	97

<sup>a</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 97.

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 or modification	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1.2	0	0
Notification of CMS demonstration	0	1	0	0
Notification of physical or operational changes	0	1	0	0
Notification of opacity or visible emission observations	0	1	0	0
Report of performance test	0	1.2	0	0
Semiannual report	97	2	0	194
Excess emissions report	97	2	0	194
			<b>Total</b>	<b>388</b>

The number of Total Annual Responses is 388.

The total annual labor costs are \$1,640,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

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

The total annual labor hours are 13,900. 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 BB) (Renewal).

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 36 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$4,010,000. 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 892 labor hours at a cost of \$44,600; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

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 no change in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This situation is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there is no significant industry growth, there are no changes in the capital/startup costs. There is an increase in the operation and maintenance (O&M) costs due to O&M costs being updated from year 2009 to 2020 using the CEPCI Index. There is also an increase in labor costs due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 36 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-OAR-2020-0657. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2020-0657 and OMB Control Number 2060-0021 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 BB) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements <sup>c</sup>	1	1	1	97	97	4.9	9.7	\$13,215.28
B. Required activities								
Initial performance tests <sup>d</sup>	374	1	374	0	0	0	0	\$0
Repeat of performance tests <sup>e</sup>	374	0.2	74.8	0	0	0	0	\$0
C. Gather existing information	See 3B							
D. Write Report								
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration	2	1	2	0	0	0	0	\$0
Notification of physical changes	2	1	2	0	0	0	0	\$0
Notification of opacity or visible emissions observations	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Semiannual report <sup>f</sup>	8	2	16	97	1,552	77.6	155	\$211,444.48
Excess emissions report <sup>g</sup>	8	2	16	97	1,552	77.6	155	\$211,444.48
<b>Subtotal for Reporting Requirements</b>						<b>3,681</b>		<b>\$436,104</b>
4. Recordkeeping requirements								
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 3A							
C. Implement Activities	See 3A							
D. Develop record system	N/A							

E. Time to enter and transmit information								
Records of operating parameters <sup>h</sup>	0.25	365	91.25	97	8,851	443	885	\$1,205,894.30
<b>Subtotal for Recordkeeping Requirements</b>					<b>10,179</b>		<b>\$1,205,894</b>	
<b>Total Labor Burden and Costs (rounded) <sup>j</sup></b>					<b>13,900</b>		<b>\$1,640,000</b>	
<b>Total Capital and O&amp;M Cost (rounded) <sup>j</sup></b>							<b>\$4,010,000</b>	
<b>GRAND TOTAL (rounded) <sup>j</sup></b>					<b>13,900</b>		<b>\$5,650,000</b>	

**Assumptions:**

<sup>a</sup> We have assumed an average of 97 existing respondents per year over the next three years. No new respondents are anticipated over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that each source will re-familiarize with the requirements each year.

<sup>d</sup> We have assumed that it will take 374 hours for each new respondent to perform the initial performance test.

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

<sup>f</sup> We have assumed that all respondents will each take eight hours to complete the semiannual report.

<sup>g</sup> We have assumed that each respondent will take eight hours to two times per year to complete the excess emissions report.

<sup>h</sup> We have assumed that it will take each respondent 15 minutes per day to record operating parameters.

<sup>i</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 BB) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
Initial performance test (new plant) <sup>c</sup>	24	1	24	0	0	0	0	\$0
Repeat performance test (new plant) <sup>d</sup>	24	0.2	4.8	0	0	0	0	\$0
Review reports (new plant)								
Notification of construction	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of CMS demonstration	0.5	1	0.5	0	0	0	0	\$0
Notification of physical/operational changes	0.5	1	0.5	0	0	0	0	\$0
Notification of opacity or visible emissions observations	0.5	1	0.5	0	0	0	0	\$0
Review test results	8	1.2	9.6	0	0	0	0	\$0
Existing plants								
Semiannual report and excess emissions report <sup>e</sup>	4	2	8	97	776	38.8	77.6	\$44,585.08
<b>TOTAL (rounded)<sup>f</sup></b>						<b>892</b>		<b>\$44,600</b>

**Assumptions:**

<sup>a</sup> We have assumed an average of 97 existing respondents per year over the next three years. No new respondents are anticipated over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.73 (clerical). These rates are from the Office of Personnel Management (OPM), 2021 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.

<sup>c</sup> We have assumed that it will take twenty-four hours for the Agency to observe the initial performance test.

<sup>d</sup> We have assumed that 20 percent of respondents would repeat performance test due to failure and that it will take twenty-four hours for Agency observation of a repeat of the performance test due to failure.

<sup>e</sup> We have assumed that it will take the Agency four hours to review the semiannual report and the excess emissions report.

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