

Table 1: Annual Respondent Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60,

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 ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with rule requirements ^c	1	1	1	97
B. Required activities				
Initial performance tests ^d	374	1	374	0
Repeat of performance tests ^e	374	0.2	74.8	0
C. Gather existing information	See 3B			
D. Write Report				
Notification of construction/ reconstruction	2	1	2	0
Notification of performance test	2	1.2	2.4	0
Notification of actual startup	2	1	2	0
Notification of CMS demonstration	2	1	2	0
Notification of physical changes	2	1	2	0
Notification of opacity or visible emissions observations	2	1	2	0
Report of performance test	See 3B			
Semiannual report ^f	8	2	16	97
Excess emissions report ^g	8	2	16	97
Subtotal for Reporting Requirements				
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 ^h	0.25	365	91.25	97
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^j				
Total Capital and O&M Cost (rounded) ^j				
GRAND TOTAL (rounded) ^j				

Assumptions:

- ^a We have assumed an average of 97 existing respondents per year over the next three years. No new respondents are a
- ^b This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates
- ^c We have assumed that each source will re-familiarize with the requirements each year.
- ^d We have assumed that it will take 374 hours for each new respondent to perform the initial performance test.
- ^e We have assumed that 20 percent of respondents would repeat performance test due to failure.
- ^f We have assumed that all respondents will each take eight hours to complete the semiannual report.

- ^g We have assumed that each respondent will take eight hours to two times per year to complete the excess emissions r
- ^h We have assumed that it will take each respondent 15 minutes per day to record operating parameters.
- ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

, Subpart BB) (Renewal)

(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 ^b
97	4.9	9.7	\$13,215.28
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1,552	77.6	155	\$211,444.48
1,552	77.6	155	\$211,444.48
3,681			\$436,104
8,851	443	885	###
10,179			\$1,205,894
13,900			\$1,640,000
			\$4,010,000
13,900			\$5,650,000

Labor Rates	
Management	\$149.84
Technical	\$122.66
Clerical	\$60.88

Responses 388
Hours/response 36

nticipated over the next three years.

are from the United States Department of Labor, Bureau of

eport.

Table 2: Average Annual EPA Burden and Cost - NSPS for Kraft Pulp Mills (40 CFR Part 60, Sub

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a
Initial performance test (new plant) ^c	24	1	24	0
Repeat performance test (new plant) ^d	24	0.2	4.8	0
Review reports (new plant)				
Notification of construction	2	1	2	0
Notification of performance test	2	1.2	2.4	0
Notification of actual startup	0.5	1	0.5	0
Notification of CMS demonstration	0.5	1	0.5	0
Notification of physical/operational changes	0.5	1	0.5	0
Notification of opacity or visible emissions observations	0.5	1	0.5	0
Review test results	8	1.2	9.6	0
Existing plants				
Semiannual report and excess emissions report ^e	4	2	8	97
TOTAL (rounded)^f				

Assumptions:

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

^b This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.73 (clerical). These rates are from Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package.

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

^d We have assumed that 20 percent of respondents would repeat performance test due to failure and that it will take twenty-four hours due to failure.

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

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

part BB) (Renewal)

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
776	38.8	77.6	\$44,585.08
892			\$44,600

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

ed over the next three years.

the Office of Personnel Management (OPM), 2021 General
s available to government employees.

ir hours for Agency observation of a repeat of the performance test

Capital/Startup vs. Operation and Maintenance (O&M) Cost				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent ^a	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent ^a
Opacity monitor	\$45,695	0	\$0	\$9,824
TRS monitor	\$123,375	0	\$0	\$26,274
Incinerator temperature monitor	\$9,824	0	\$0	\$5,255
Scrubber liquid supply pressure monitor	\$400	0	\$0	\$0
Scrubber liquid flow rate monitor	\$17,707	0	\$0	\$0
Total			\$0	

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

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	97	0	0
2	0	97	0	0
3	0	97	0	0
Average	0	97	0	0

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	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
			Total	388

:S	
(F)	(G)
Number of Respondents with O&M	Total O&M, (ExF)
97	\$952,960
97	\$2,548,615
97	\$509,723
0	\$0
0	\$0
	\$4,010,000

CEPCI Index	
Year	Index
2009	521.9
2020	596.2

(E)
Number of Respondents (E=A+B+C-D)
97
97
97
97