Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Final Amendments)

					119.03	148.97	57.62	
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 [a]**	**(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 [b]**
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements [c]	1	1	1	244	244	12.2	24.4	$32,267
1) Amendments pertaining to PCWP mills [d]	10	1	10	38	380	19	38	$50,251
2) Amendments pertaining to lumber mills [e]	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 [f]	2	1	2	15	30	1.5	3	$3,967
2) Notification of anticipated startup [f]	2	1	2	15	30	1.5	3	$3,967
3) Notification of actual startup [f]	2	1	2	15	30	1.5	3	$3,967
4) Notification of applicability of standard (initial notification) [f]	2	1	2	15	30	1.5	3	$3,967
5) Emissions averaging plan [g]	120	1	120	0	0	0	0	$0
6) Request for routine control system maintenance exemption [h]	2	1	2	2	4	0.2	0.4	$529
7) Notification of performance test [i]	2	1	2	40	80	4	8	$10,579
8) Notification of compliance status (electronically reported)								
a. With performance test [i]	80	1	80	40	3200	160	320	$423,170
b. Without performance test [j]	60	1	60	2	120	6	12	$15,869
9) Initial compliance report (electronically reported) [l]								
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 [m]	8	1	8	0	0	0	0	$0
d. Emissions averaging report [g]	8	1	8	0	0	0	0	$0
10) Semiannual compliance report (electronically reported) [k]								
a. No deviations [n]	8	2	16	102	1632	81.6	163	$215,816

b. Deviation [n]	24	2	48	11	528	26.4	52.8	$69,823
c. Control system maintenance report [o]	8	2	16	11	176	8.8	17.6	$23,274
d. Emissions averaging report [p]	20	2	40	1	40	2	4	$5,290
Subtotal for Reporting Requirements					**7,507**			**$863,266**
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system [q]	40	1	40	2	80	4.0	8.0	$10,579
1) Adjustments to existing system for PCWP mills [d]	80	2	160	38	6080	304	608	$804,022
2) Adjustments to existing system for lumber mills [e]	0	3	0	43	0	0	0	$0
E. Time to enter information								
1) Records of continuous compliance for PCWP facilities [r]								
a. Record parameters/information	0.25	365	91.25	114	10403	520	1040	$1,375,632
b. Compile data	24	2	48	114	5472	274	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 [s]	16	1	16	114	1824	91.2	182	$241,207
G. Time to train personnel [t]	40	1	40	2	80	4	8	$10,579
H. Time to refresher training for personnel [u]	16	1	16	23	368	18.4	36.8	$48,665
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**32,148**			**$3,696,717**
TOTAL LABOR BURDEN AND COST (rounded) [v]					**39,700**			**$4,560,000**
CAPITAL AND O&M COST (rounded) [v]								**$2,365,000**
GRAND TOTAL (rounded) [v]								**$6,930,000**

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 (yr 1)+ 243 (yr 2) + 245 (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 existing + 2 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 x 2 new PCWP mills = 1] and [0.1 x 2 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 x 113 existing PCWP mills = 102] and [0.1 x 113 existing PCWP mills = 11]

[o] We have assumed that 10 percent of the existing PCWP facilities will submit control device maintenance report. [0.1 x 113 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 new mills + 5 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 new mills + 5 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) (Final Amendments)

					48.75	65.71	26.38	
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 [a]**	**(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, $ [b]**
1. Attend performance test [c]	24	1	24	4	96	4.8	9.6	$5,249
2. Report review								
A. Notification of construction/reconstruction [d]	2	1	2	15	30	1.5	3	$1,640
B. Notification of anticipated startup [d]	2	1	2	15	30	1.5	3	$1,640
C. Notification of actual startup [d]	2	1	2	15	30	1.5	3	$1,640
D. Notification of applicability of standard (initial notification) [d]	2	1	2	15	30	1.5	3	$1,640
E. Review of emissions averaging plan [e]	40	1	40	0	0	0	0	$0
F. Review of request for routine control system maintenance exemption [f]	2	1	2	2	4	0.2	0.4	$219
G. Notification of performance test [g]	1	1	1	40	40	2	4	$2,187
H. Notification of compliance status								
1) With performance test [h]	8	1	8	40	320	16	32	$17,496
2) Without performance test [i]	4	1	4	2	8	0.4	0.8	$437
I. Review of initial compliance report [j]								
1) No deviations [k]	2	1	2	2	4	0.2	0.4	$219
2) Deviations [k]	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 [e]	8	1	8	0	0	0	0	$0
J. Review of semiannual compliance report								
1) No deviations [k]	2	2	4	102	408	20.4	40.8	$22,307
2) Deviations [k]	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 [e]	8	2	16	1	16	0.8	1.6	$875
TOTAL ANNUAL BURDEN AND COST(rounded) [l]					**1310**			**$62,300**

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 (yr 1)+ 243 (yr 2) + 245 (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 x 1.6), $48.75 Technical rate (GS-12, Step 1, $30.47 x 1.6), and $26.38 Clerical rate (GS-6, Step 3, $16.49 x 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 x 117 facilities/3 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

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs

(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[1]	(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	2	$120,000			$0
Initial tests on new process lines at existing mills (inlet/outlet)	$30,000	5	$150,000			$0
Repeat tests (inlet/outlet)	$60,000	113	$6,780,000			$0
Totals			**$7,066,000**			**$10,000**
Average capital/ startup + O&M cost for 3-year period						**$2,365,000**

Note: Totals have been rounded to 2 significant figures. Figures may not add exactly due to rounding.

[1] Based on average number of PCWP facility respondents over the 3-year period (113 + 113 + (113+2)) / 3 = 114. Annual O&M costs are not curently required in the rule for lumber mills.

[2] 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.

[3]Calculated as the column D total cost divided by 3 years plus the column G total annual cost.

$2,358,667

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents[1]	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	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
Average	2	243	0	2	244

[1] New respondents include sources that construct or reconstruct affected facilities during the ICR response period.

Total Annual Responses

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

Information Collection Activity	Number of Respondents	Number of 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
Total Number of Annual Responses			**Total**	**396**

No. of major sources	Existing	Under construction (existing for ICR purposes)	Projected over next 5 years	Projected over 3-year ICR period	Notes
No. PCWP mills	109	4	2	2	2 new OSB mills are projected, assuming 2 RTOs each
PCWP mills also making lumber	16				
Projected PCWP lines added at exising mills			7	5	Projected line additions: MDF, PB, LVL, 2 SPW, 2 mills with SW veneer dryers. 7 RTOs projected.
No. sawmills with lumber kilns	121	9			
Projected bacth kilns added at existing sawmills			25	15	
Projected CDKs added at existing sawmills			40	24	
Total	**230**	**13**			
Data source	ICR	New source projections memo	New source projections memo		