

### ICR Summary Information

Hours per Response	79
Number of Respondents	12
Total Estimated Burden Hours	4,250
Total Estimated Costs	\$1,000,000
Annualized Capital O&M	\$487,000
Total Annual Responses	54
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – Kraft Pulp Mill Affected Sources for Which Const Commenced After May 23, 2013 (40 CFR Part 60, Subpart BBa) (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)
1. Applications	N/A				
2. Survey and studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements <sup>c</sup>	30	1	30	12	360
B. Required activities					
Initial performance tests <sup>d</sup>	80	1	80	0	0
5-year repeat performance tests <sup>d,e</sup>	80	1	80	2	160
Repeated performance tests due to failure <sup>d,f</sup>	80	0.2	16	0.4	6
C. Gather existing information	See 3B				
D. Write report					
Notification of construction/reconstruction	2	1	2	0	0
Notification of performance test <sup>f</sup>	2	1.2	2.4	2.4	6
Notification of actual startup	2	1	2	0	0
Notification of CMS demonstration	2	1	2	0	0
Notification of physical or operational changes	2	1	2	0	0
Notification of opacity observations	2	1	2	0	0
Report of performance test (including submittal through EPA's ERT) <sup>f,g</sup>	4	1.2	4.8	2.4	12
Semiannual report <sup>h,i</sup>	8	2	16	12	192
Excess emissions/monitoring systems report <sup>i,j</sup>	20	2	40	12	480
Malfunction report (affirmative defense) <sup>k</sup>	30	2	60	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Read instructions	See 3A				
B. Plan activities	See 3B				
C. Implement activities	See 3B				
D. Develop record system <sup>l</sup>	40	1	40	0	0
E. Time to enter and transmit information					

Records of monitoring data <sup>m</sup>	0.5	365	182.5	12	2,190
Records of malfunctions	2	12	24	12	288
<b>Subtotal for Recordkeeping Requirements</b>					
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>n</sup></b>					
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>n</sup></b>					
<b>GRAND TOTAL (rounded) <sup>n</sup></b>					

**Assumptions:**

- <sup>a</sup> We assume 12 mills per year will be subject to the rule with no additional respondents.
- <sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Clerical \$75.05. Source: United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Civilian Workers, by occupational category and sex, 2019.” “Total compensation.” The rates have been increased by 110 percent to account for varying industry wage rates and the additional costs beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.
- <sup>c</sup> We assume that each respondent will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> We assume it will take 80 hours for each respondent to coordinate the performance tests for PM, CPM, opacity and TRS. Test and O&M costs.
- <sup>e</sup> Repeat performance tests are required in 5-year intervals. We assume 2 respondents per year will be required to conduct repeat tests.
- <sup>f</sup> We assume that 20 percent of respondents would repeat a performance test due to failure.
- <sup>g</sup> Hard copy report of performance test is included in 3B. Submittal of performance test data through EPA's ERT is estimated to be 10 percent of total test cost.
- <sup>h</sup> Assumes that it will take each respondent 8 hours to complete the semiannual report.
- <sup>i</sup> Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods.
- <sup>j</sup> We assume each respondent will take 20 hours two times per year to review monitoring data (e.g., to document compliance with the rule).
- <sup>k</sup> Not applicable.
- <sup>l</sup> Includes time to adjust existing data acquisition systems at modified sources to include startup and shutdown periods and continuous monitoring activity.
- <sup>m</sup> We assume that it will take each respondent 30 minutes per day to document monitoring data (e.g., operating parameters, operator observations, and startup/shutdown).
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**rection, Reconstruction, or Modification**

(F)	(G)	(H)
Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total cost per year <sup>b</sup>
18	36	\$49,706.62
0	0	\$0.00
8	16	\$22,091.83
0.3	0.6	\$883.67
0	0	\$0.00
0.3	0.6	\$795.31
0	0	\$0.00
0	0	\$0.00
0	0	\$0.00
0	0	\$0.00
0	0	\$0.00
0.6	1.2	\$1,590.61
10	19	\$26,510.20
24	48	\$66,275.50
0	0	\$0
<b>1,398</b>		<b>\$167,854</b>
0	0	\$0.00

Labor Rates	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

110	219	\$302,381.95
14	29	\$39,765.30
<b>2,850</b>		<b>\$342,147</b>
<b>4,250</b>		<b>\$510,000</b>
		<b>\$487,000</b>
		<b>\$1,000,000</b>

79 hrs/response

rical \$62.52 (\$29.77 + 110%). These rates are from the and industry group.” The rates are from column 1, onal overhead business costs of employing workers

sting contractor costs are included in the capital/startup

at performance tests.

o require 4 hours per test.

with allowances) and complete the excess emissions

nply with revised monitoring allowances; this is a one-

acity and TRS monitoring data, CMS performance

**Table 2: Average Annual EPA Burden and Cost – Kraft Pulp Mill Affected Sources for Modification Commenced After May 23, 2013 (40 CFR Part 60, Subpart BBa) (Renewal)**

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=A×B)	Plants per year <sup>a</sup>
1. Attend initial performance test <sup>c</sup>	24	1	24	0
2. Attend 5-year repeat performance test <sup>c, d</sup>	24	1	24	2
3. Attend repeat performance test due to failure <sup>c, e</sup>	24	0.2	4.8	0.4
4. Report review				
Review notification of construction/reconstruction	2	1	2	0
Review notification of performance test <sup>e</sup>	0.5	1.2	0.6	2.4
Review notification of actual startup	0.5	1	0.5	0
Review notification of CMS demonstration	0.5	1	0.5	0
Review notification of physical/operational changes	0.5	1	0.5	0
Review notification of opacity observations	0.5	1	0.5	0
Review performance test reports <sup>e</sup>	8	1.2	9.6	2.4
Review semiannual report <sup>f, g</sup>	4	2	8	12
Review excess emissions/monitoring systems report <sup>f, g</sup>	8	2	16	12
<b>TOTAL (rounded)<sup>h</sup></b>				

**Assumptions:**

<sup>a</sup> We assume 12 mills per year will be subject to the rule with no additional respondents.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60% \$28.34 (GS-6, Step 3, \$17.71 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. Rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality, rates and benefit packages available to government employees.

<sup>c</sup> We assume that it will take EPA personnel 24 hours to attend each performance test.

<sup>d</sup> Repeat performance tests are required in 5-year intervals. We assume 2 respondents per year will be required.

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

<sup>f</sup> We assume that it will take EPA personnel 4 hours to review each semiannual report and 8 hours to review each excess emissions/monitoring systems report.

<sup>g</sup> Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods.

<sup>h</sup> Totals have been rounded to 3 significant figures.

**r Which Construction, Reconstruction, or  
al)**

(E)	(F)	(G)	(H)
Technical person- hours per year (E=C×D)	Management person-hours per year (F=E×0.05)	Clerical person-hours per year (G=E×0.1)	Cost <sup>b</sup>
0	0	0	\$0.00
48	2.4	4.8	\$2,819.14
1.92	0.096	0.192	\$112.77
0	0	0	\$0.00
1.44	0.072	0.144	\$84.57
0	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
23	1.2	2.3	\$1,353.19
96	4.8	10	\$5,638.27
192	10	19	\$11,276.54
<b>417</b>			<b>\$21,300</b>

Labor Rates	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

0%); Technical \$52.37 (GS-12, Step 1, \$32.73 + 60%); and Clerical  
rs, and Clerical hours are 10 percent of Technical hours. These rates  
of pay. The rates have been increased by 60 percent to account for the

l to conduct repeat performance tests.

ach excess emissions report and malfunction report.





<b>Capital/Startup vs. Operation and Maintenance (O&amp;M)</b>				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/ Startup Cost for One Respondent	Number of New Respondents	Total Capital/ Startup Cost (B X C)	Annual O&M Costs for One Respondent
Opacity monitor	\$40,000	0	\$0	\$8,600
TRS monitor	\$108,000	0	\$0	\$23,000
ESP voltage and current monitors	\$31,000	0	\$0	\$4,200
Scrubber pressure drop monitor <sup>a</sup>	\$350	0	\$0	\$70
Scrubber liquid flow rate monitor <sup>a</sup>	\$15,500	0	\$0	\$3,100
Performance tests:				
Initial Method 9 for opacity	\$1,000	0	\$0	
Initial Method 5 and 202 for PM and condensable PM (CPM)	\$6,800	0	\$0	
Initial Method 16, 16A, 16B or 16C for TRS	\$3,000	0	\$0	
Repeat Method 5 and 202 for PM and CPM (every 5 years) <sup>b</sup>	N/A			\$6,800
Repeat Method 16, 16A, 16B or 16C for TRS (every 5 years) <sup>b</sup>	N/A			\$3,000
<b>Total <sup>c</sup></b>			<b>\$0</b>	

<sup>a</sup> Scrubber monitor O&M costs were estimated as 20 percent of the initial monitor cost.

<sup>b</sup> Repeat tests are required in 5-year intervals. We assume that 2 respondents per year will be r performance tests.

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

<b>Costs</b>	
(F)	(G)
Number of Respondents with O&M	Total O&M (E X F)
12	\$103,200
12	\$276,000
12	\$50,400
12	\$840
12	\$37,200
2	\$13,600
2	\$6,000
	<b>\$487,000</b>

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ng.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>a</sup>	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	12	0	0	12
2	0	12	0	0	12
3	0	12	0	0	12
Average	0	12	0	0	12

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<b>Total Annual Responses</b>				
(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/reconstruction	0	1	0	0
Notification of performance test <sup>a</sup>	2.4	1.2	0	2.88
Notification of actual startup	0	1	0	0
Notification of CMS demonstration	0	1	0	0
Notification of physical or operational changes	0	1	0	0
Notification of opacity observations	0	1	0	0
Report of performance test (including submittal through EPA's ERT) <sup>a</sup>	2.4	1.2	0	2.88
Semiannual report	12	2	0	24
Excess emissions/monitoring systems report	12	2	0	24
			<b>Total</b>	<b>54</b>

<sup>a</sup> We assume that there are no new respondents each year and that two existing respondents will have to complete the 5-year repeat performance tests during the three-year period of this ICR. We also assume that 20% of respondents will have to repeat a performance test due to failure.