U.S. Environmental Protection Agency

Information Collection Request

TITLE: NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

OMB CONTROL NUMBER: 2060-0377

EPA ICR NUMBER: 1805.12

ABSTRACT:

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart MM were proposed on April 15, 1998; promulgated on January 12, 2001; and amended on April 20, 2006, October 11, 2017, November 5, 2020, and November 19, 2020. These regulations apply to new and existing chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills, for which the chemical recovery combustion sources emit greater than or equal to 10 tons per year (tpy) of any one hazardous air pollutant (HAP) or greater than or equal to 25 tpy of any combination of HAPs. New affected facilities include those that commenced construction or reconstruction after the April 15, 1998 proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart MM.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The “Affected Public” includes owners and operators of affected facilities at kraft, soda, sulfite, and stand-alone semichemical pulp mills. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone

Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal). There are approximately 96 kraft, soda, sulfite, and stand-alone semichemical pulp mill facilities, which are owned and operated by the kraft, soda, sulfite, and stand-alone semichemical pulp mill industry. All the chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills facilities in the United States are owned and operated by the kraft, soda, sulfite, and stand-alone semichemical pulp mills industry. None of the 96 facilities in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

Over the next three years, approximately 96 respondents per year will be subject to the standard. In addition, one existing respondent on average per year is expected to construct new process units that will be subject to this NESHAP over the 3-year period of this ICR. Mills can have more than one affected facility onsite (e.g., recovery furnace, smelt dissolving tanks, lime kiln). Based on current industry trends, any new furnace is expected to be a non-direct contact evaporator (NDCE) recovery furnace equipped with a dry ESP system. The respondent universe and growth rate are based on a review of affected facilities in EPA's Enforcement and Compliance History Online (ECHO) and Greenhouse Gas Reporting Program (GHGRP) databases.

The active (previous) ICR had the following Terms of Clearance (TOC):

"In accordance with 5 CFR 1320, the information collection is approved for three years. As terms of clearance, upon renewal of this collection, EPA is required to include the following in its supporting statement for this and other NESHAP ICRs: (1) a description of the regulatory text applicable to the ICR including submission specifications; (2) a clear description of the data elements being collected under the ICR; (3) screen shots of the electronic portal where the reporting requirements are submitted to EPA (with the control number and burden statement); (4) a detailed discussion of how information is submitted and the extent to which electronic reporting is available; (5) evidence of consultation with respondents (by actively reaching out to stakeholders as permitted by the PRA) to ensure the supporting statement's accuracy on availability of data, frequency of collection, clarity of instructions, accuracy of burden estimate, relevance of data elements, and similar PRA matters; and (6) discussion of how EPA addressed substantive concerns raised by respondents and other stakeholders during consultation and in response to comments received on FR notices. In addition, please convert the supporting statement to the standard 18 question SS-A format upon renewal."

The relevant regulatory text is referenced in section 4(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements, which includes a description of the data elements being collected under the ICR, as identified in section 4(b)(i) of this document. All electronic collection in this information collection is submitted through EPA's ERT, as discussed in section 4(b)(i) of this document. Additional Paperwork Reduction Act requirements for CEDRI and ERT, including the burden statement and OMB control number, are available at: *https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert*. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal. A description of the EPA's consultation with respondents and how EPA responded to any concerns raised by respondents or other stakeholders is discussed in sections 3(b) and 3(c) of this document.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, HAP emissions, including acetaldehyde, benzene, formaldehyde, methanol, methyl isobutyl ketone, phenol, styrene, toluene, and xylenes, from chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart MM.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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 the emission standards. Continuous emission monitors are used to ensure compliance with the 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 the 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 the 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of notifications required in 40 CFR 63.9(b) and (j), notifications of compliance status required in 40 CFR 63.867(d)(2), and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For excess emission reports, EPA is developing a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart MM. For the notifications required in 40 CFR 63.9(b), 63.9(j), and 63.867(d)(2), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also requiring that 40 CFR Part 63, Subpart MM performance test reports be submitted through the EPA's ERT.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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.

The rule was amended to include electronic reporting provisions on October 11, 2017 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The excess emission reports are to be created using Form 5900-520, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent excess emissions reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with

the proposed requirement for respondents to submit the notifications and reports electronically. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: *https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert*.

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

With the following exception, these reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) published on May 18, 2023. No comments were received on the burden published in the *Federal Register* for this renewal.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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 the standard, 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 96 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Council for Air and Stream Improvement at (919) 941-6400 and the American Forest and Paper Association at (202) 463-2700.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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 (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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or*

paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are owners or operators of chemical recovery combustion sources at kraft, soda, sulfite, and stand-alone semichemical pulp mills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC codes and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 63, Subpart MM)	**SIC Codes**	**NAICS Codes**
Pulp Mills	2611	32211
Paper Mills	2621	32212
Paperboard Mills	2631	32213

Based on our research for this ICR, on average over the next three years, approximately 96 existing respondents will be subject to the standard. It is estimated that one existing mill per year (for a total of three existing mills) will have new process units that will become subject to these regulations in the next 3 years. The overall average number of respondents, as shown in the table below, is 96 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 [1]	(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	1	96	0	1	96
2	1	96	0	1	96
3	1	96	0	1	96
Average	1	96	0	1	**96**

[1] 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 96.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity [a]	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	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of applicability of standard	1	1	0	1
Notification of performance test/ retest	38	1	0	38
Notification of performance evaluation	38	1	0	38
Notification of compliance status	1	1	0	1
Report of performance test/retest	38	1	0	38
Semiannual report of monitoring exceedances and periods of noncompliance	5	2	0	10
Semiannual report of no exceedances	91	2	0	182
			Total	**310**

The number of Total Annual Responses is 310.

The total annual labor costs are $13,700,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery

Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	§ 63.5(d)
Notification of actual startup	§ 63.9(b)(4)(v)
Notification of applicability of standard	§ 63.9(b)(2)
Notification of performance test	§§ 63.7(b), 63.9(e)
Notification of performance evaluation	§ 63.9(g)
Notification of compliance status (electronic submission)	§§ 63.9(h), 63.867(b)(1)-(2), 63.867(d)
Notification of reclassification to area source status or to revert back to major source status (electronic submission)	§§63.9(b), 63.9(j)

Reports	
Results of performance test (electronic submission)	§ 63.10(d)(2)
Results of performance evaluation	§ 63.10(e)(2)
Semiannual excess emission reports and summary reports (electronic submission)	§§ 63.10(e)(3)(v), 63.867(c) and (d)

A source must keep the following records:

Recordkeeping	
5 years retention of records	§ 63.10(b)(1)
Records of performance tests	§ 63.10(b)(2)(viii)
Documentation supporting initial notifications and notifications of compliance status	§ 63.10(b)(2)(xiv)
Exceedances under section 63.864(k) requiring corrective action and violations	§ 63.866(b)

Recordkeeping	
Black liquor solids firing rates for all recovery furnaces and semichemical combustion units	§ 63.866(c)(1)
Lime production rates for all lime kilns	§ 63.866(c)(2)
All parameter monitoring data required in section 63.864	§ 63.866(c)(3)
Supporting calculations for compliance determinations made under section 63.865(a) through (d)	§ 63.866(c)(4)
Compliant parameter operating limits established for each affected source or process unit	§ 63.866(c)(5)
Certification that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in section 63.862(c)(1)	§ 63.866(c)(6)
Bag leak detection system alarms and corrective actions	§ 63.866(c)(7)
Compliance with requirement in section 63.864(e)(1) to maintain proper operation of ESP's AVC	§§ 63.866(c)(8), 63.864(e)(1)
Number, timing, and duration of failures to meet applicable standards	§ 63.866(d)(1)
For each failure, a list of affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over the emission limit, a description of the method used to estimate emissions, and sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit	§ 63.866(d)(2)
Actions taken to minimize emissions and corrective actions taken to return affected unit to normal operation	§ 63.866(d)(3)

12c. RESPONDENT ACTIVITIES

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity and automatic voltage control, pressure drop, liquid flow rate, or fan amperage for each ESP and wet scrubber, temperature for each RTO, or leak detection for fabric filter systems.
Perform initial and performance tests using EPA Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 25A, 29, or 308, 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.

Respondent Activities
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.
Transmit, or otherwise disclose the information.

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 – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 108,000 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

This ICR uses the following labor rates:

Managerial	$163.17 ($77.70 + 110%)
Technical	$130.28 ($62.04 + 110%)
Clerical	$65.71 ($31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

The total annual labor hours are 108,000. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (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 348 hours per response.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The type of industry costs associated with the information collection activities in the subject standard 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 the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance Costs						
(A) Cost Item	(B) Annualized Capital/Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous Monitoring Device:						
Continuous opacity monitoring system (COMS)	$41,000	0	0	$8,000	0	$0
Continuous parameter monitoring	$0	0	0	$0	0	$0

system (CPMS)						
Performance tests: [a,b]						
Method 5 for PM	$2,439	234	$570,726	$0	0	$0
Method 25A for THC	$3,414	5	$17,070	$0	0	$0
Method 308 for methanol	$3,414	6	$20,484	$0	0	$0
Retests	--	--	$0	--	--	--
Total			**$608,000**			**$0**

[a] We estimate that 20% of respondents will repeat the performance test due to failure. Estimate assumes 96 existing facilities with 234 sources, and 6 new sources at 3 existing facilities, 5 of which require THC testing.

[b] Annualized capital costs were estimated assuming a 5-year payment period at 7% interest for initial performance tests (with a capital recovery factor of 0.244).

The total capital/startup costs for this ICR are $608,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $0. 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 $608,000. These are recordkeeping costs.

The total annual capital/startup and O&M costs to the regulated entity are $608,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

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

Agency Activities
Review notifications and reports, including performance test 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.

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 standard 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 five years.

14b. Agency Burden and Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 $44,300.

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

Managerial	$73.46 (GS-13, Step 5, $45.91 + 60%)
Technical	$54.51 (GS-12, Step 1, $34.07 + 60%)
Clerical	$29.50 (GS-6, Step 3, $18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal).

The average annual Agency burden and cost over next three years is estimated to be 802 labor hours at a cost of $44,300. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (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.

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The decrease in burden from the most recently approved ICR is due to an adjustment(s).

The adjustment decrease in burden from the most recently approved ICR is due to a decrease in the number of sources. The number of facilities has decreased from 104 to 96. The decrease in respondents also results in a decrease in capital/startup costs. This ICR also corrects a mathematical error in the calculations of the active ICR which applies incorrect labor rates for the management and clerical labor categories.

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Although this rule does not require electronic reporting, respondents could choose to submit notifications or reports electronically. All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at https://www.epa.gov/chief/chief-listserv for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at https://www.regulations.gov/ for public review and printing.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 348 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or 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-2020-0624. 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), EPA 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. 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-2020-0624 and OMB Control Number 2060-0377 in any correspondence.

ADDITIONAL TABLES AND APPENDICES

Table 1: Annual Respondent Burden and Cost – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

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 hr/yr (E=CxD)	(F) Management person hr/yr (Ex0.05)	(G) Clerical person hr/yr (Ex0.1)	(H) Total Cost Per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with the regulatory requirements [c]	1	1	1	96	96	4.8	9.6	$13,920.91
B. Required activities [d]								
Prepare for initial/periodic performance test	24	1	24	23	552	27.6	55.2	$80,045.24
Attend initial/periodic performance test	24	2	48	23	1,104	55.2	110.4	$160,090.49
Prepare for retest	24	1	24	5	120	6	12	$17,401.14
Attend retest	24	2	48	5	240	12	24	$34,802.28
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write reports								
Notifications								
Notification of construction/reconstruction	2	1	2	1	2	0.10	0.20	$290.02
Notification of actual startup	2	1	2	1	2	0.10	0.20	$290.02
Notification of applicability of	2	1	2	1	2	0.10	0.20	$290.02

standard								
Notification of compliance status [e,f]	80	1	80	1	80	4.00	8.00	$11,600.76
Notification of performance test/retest [g]	2	1	2	38	76	3.8	7.6	$11,020.72
Notification of performance evaluation [g]	2	1	2	38	76	3.8	7.6	$11,020.72
Report of performance test/retest (through CEDRI using ERT) [g]	8	1	8	38	304	15.2	30.4	$44,082.89
Excess emissions report (through CEDRI) [h]								
Semiannual reports of monitoring exceedances and periods of noncompliance	16	2	32	5	160	8	16	$23,201.52
Semiannual reports of no exceedances	8	2	16	91	1,456	72.8	145.6	$211,133.83
Subtotal for Reporting Requirements					4,911			$619,191
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system [i]	40	1	40	1	40	2	4.00	$5,800.38
E. Time to enter information								
Records and documentation of supporting calculations for compliance determinations [j]	8	1	8	38	304	17	30.4	$44,376.59
Record of compliant monitoring parameter ranges	2	1	2	38	76	4.3	7.6	$11,102.31
Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with	2	1	2	1	2.0	0.07	0.2	$285.12

the gaseous organic HAP standard for kraft and soda recovery furnaces [k]								
Records demonstrating compliance with requirement to maintain proper operation of ESP's AVC [l]	8	2	16	164	2,624	146	262.4	$382,919.84
Records of failures to meet standards [m]	2	12	24	5	120	6	12	$17,401.14
Records of black liquor solids firing rates for recovery furnaces and semichemical combustion units [n]	1.5	52	78	96	7,488	406	748.8	$1,090,987.31
Records of lime production for lime kilns [o]	1.5	52	78	87	6,786	382	678.6	$991,001.83
Records of CMS data [p]	0.5	1,050	525	96	50,400	2,809	5040	$7,355,634.93
F. Time to train personnel								
Initial training [q]	40	1	40	1	40	2	4.00	$5,800.38
Refresher training [r]	16	1	16	96	1,536	86	153.6	$224,235.76
G. Time to adjust existing ways to comply with previously applicable requirements [s]	17.8	1	17.8	0	0	144	0	$23,496.48
H. Time to transmit or disclose information								$0.00
Compile data for semiannual periods [t]	96	2	192	96	18,432	1,027	1843.2	$2,690,013.22
Enter/verify information for semiannual reports [u]	8	2	16	96	1,536	86	153.60	$224,235.76
I. Time for audits	N/A							
Subtotal for Recordkeeping					103,440			$13,067,291

Requirements								
TOTAL LABOR BURDEN AND COSTS (rounded) [v]					108,000			$13,700,000
TOTAL CAPITAL AND O&M COST (rounded) [v]								$608,000
GRAND TOTAL (rounded) [v]								$14,300,000

[a] We estimate that the number of existing sources subject to the rule is 96 pulp mills. We also estimate that new equipment will be installed at three existing pulp mills and become subject to the rule over the 3 years of this ICR (two new recovery furnaces, two new SDTs, and one new lime kiln). Based on these estimates, over the 3 years of this ICR, there will be an average of 96 pulp mills per year and new source requirements for an average of 1 pulp mills per year.

[b] This ICR uses the following labor rates: $163.17 ($77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; $130.28 ($62.04 + 110%) per hour for Technical labor, and $65.71 ($31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

[c] We have assumed that it will take 1 hour each year for existing respondents to refamiliarize themselves with rule requirements.

[d] We estimate that it will take the respondent 24 hours to prepare for initial/periodic performance test (e.g., prepare test plan) and 24 hours to attend the test. We also estimate 2 plant personnel will attend the test. We estimate that 74 mills will need to conduct a test (the rest of the 104 existing mills are already required under existing state rules to conduct tests); this will occur once during the 3-year ICR period (74 respondents/3 years = 25). In addition, we estimate that 20% of respondents (20% x 25 respondents =5) will repeat performance test due to failure.

[e] With the exception of the notification of compliance status, we estimate that it will take the respondent 2 hours once per year to complete the notifications and submit selected ones through the EPA's CEDRI.

[f] We estimate that it will take the respondent 80 hours once in the initial year to prepare the notification of compliance status and submit it through the EPA's CEDRI.

[g] Hard copy report of performance test/retest is included in capital/startup costs. Submittal of performance test/retest data through the EPA's CEDRI in ERT format is estimated to require 8 hours for 38 mills (see respondent calculation in footnote f of Table 2).

[h] We estimate that 5% of respondents (5% x 96 respondents = 5) will each take 16 hours two times per year to complete reports of monitoring exceedances and periods of noncompliance and submit them through the EPA's CEDRI. We estimate that 95% of respondents (95% x 96 respondents = 91) will each take 8 hours two times per year to write reports of no exceedances and submit them through the EPA's CEDRI.

[i] We estimate that it will take one respondent 40 hours to develop a record system to comply with monitoring requirements.

[j] We estimate that it will take the respondent 8 hours (1 day) each year to enter records and documentation of supporting calculation for compliance determinations and 2 hours to enter a record of compliant monitoring parameter ranges. We estimate that 38 mills (see footnote g) will enter this information (includes initial test and retest, for mills required to retest).

[k] We estimate that 2 existing mills will install new recovery furnaces over 3 years, for an average of 1 mill with new recovery furnaces per year over the ICR period (2 mills/3 years= 0.67, or 1, rounded). Based on current industry trends, the new furnaces are expected to be a non-direct contact evaporator (NDCE) recovery furnace equipped with a dry ESP system. We estimate that it will take the respondent 2 hours to record this information.

[l] We estimate that it will take 8 hours per semiannual period each year to keep records demonstrating compliance with the requirement to maintain proper operation of the ESP AVC for 164 recovery furnace and lime kiln ESPs.

[m] We estimate that 5% of respondents (5% x 104 respondents = 5) will fail to meet standards each year. We estimate that each respondent will take 2 hours 12 times per year to keep records of failures to meet the standards.

[n] We estimate 96 existing kraft, soda, and stand-alone semichemical pulp mills have recovery furnaces or other chemical recovery combustion units that will need to keep records of black liquor solids firing rate. We estimate that each respondent will take 1.5 hours 52 times per year to keep these records.

[o] We estimate 87 existing kraft and soda pulp mills have lime kilns that will need to keep records of lime production rate. We estimate that each respondent will take 1.5 hours 52 times per year to keep these records.

[p] We estimate that each respondent will take 0.5 hours 1,050 times per year to record wet scrubber and regenerative thermal oxidizer (RTO) parameters at all existing 96 mills.

[q] We estimate that it will take the respondent 40 hours (1 week) once per year for initial training of personnel with new sources (3 new respondents/3 years = 1).

[r] We estimate that it will take each respondent 16 hours to provide refresher training each year for personnel at all 96 existing mills.

[s] Over the period October 11, 2017 through October 11, 2020, due to the RTR amendments published on October 11, 2017, we estimated that it would take each respondent 80 hours to make a one-time adjustment to existing data acquisition systems to include startup and shutdown periods and the revised opacity monitoring allowances, and to transition to electronic excess emissions reporting. This ICR includes the burden for the period January 1, 2022 through December 31, 2024 and assumes that existing sources are no longer performing this one-time implementation activity.

[t] We estimate that each respondent will take 96 hours per semiannual period to compile data for all 96 mills.

[u] We estimate that each respondent will take 8 hours two times per year to verify information for reports for all 96 mills.

[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 Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (40 CFR Part 63, Subpart MM) (Renewal)

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 hr/yr (E=CxD)	(F) Management person hr/yr (Ex0.05)	(G) Clerical person hr/yr (Ex0.1)	(H) Cost, $ [b]
1. Attend initial/periodic performance test [c]	24	1	24	3.2	76.8	3.84	7.68	$4,695.18
2. Attend retest [c,d]	24	1	24	0.6	14.4	0.72	1.44	$880.35
3. Report review								
Notification of construction/reconstruction [e]	2	1	2	1	2.00	0.10	0.20	$122.27
Notification of actual startup [e]	2	1	2	1	2.00	0.10	0.20	$122.27
Notification of applicability of standard [e]	2	1	2	1	2.00	0.10	0.20	$122.27
Notification of initial/periodic performance test [f]	2	1	2	38	76	3.8	7.6	$4,646.28
Notification of performance evaluation [f]	2	1	2	38	76	3.8	7.6	$4,646.28
Review of notification of compliance status [e]	4	1	4	1	4.00	0.20	0.40	$244.54
Review of excess emissions report								
Semiannual reports of monitoring exceedances and periods of noncompliance [g]	8	2	16	5	80	4	8	$4,890.82
Semiannual reports of no exceedances [h]	2	2	4	91	364	18.2	36.4	$22,253.21
Subtotal for Burden and Cost - Salary					802			$42,623

Travel Expenses for Tests Attended [i]								$1,710
TOTAL ANNUAL BURDEN AND COST [j]								$44,300

[a] We estimate that the number of existing sources subject to the rule is 96 pulp mills. We also estimate that new equipment will be installed at three existing pulp mills and become subject to the rule over the 3 years of this ICR (two new recovery furnaces, two new SDTs, and one new lime kiln). Based on these estimates, over the 3 years of this ICR, there will be an average of 96 pulp mills per year and new source requirements for an average of 1 pulp mills per year.

[b] The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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.

[c] Assume EPA will attend tests at 3.2 plants per year. We estimate that it will take EPA personnel 24 hours once per year to attend initial and periodic performance tests at 10% of plants (0.10 x 96/3 years = 3.2), assuming 96 existing plants will test.

[d] Assume EPA will attend retests at 0.6 plants per year. We estimate that 20% of respondents will repeat performance test due to failure and that EPA personnel will attend 10% of retests (0.20 x 0.10 x 96/3 years = 0.64), assuming 96 existing plants and 1 new plant will test.

[e] We estimate that it will take EPA personnel 2 hours once per year to complete review of the initial notifications (construction/reconstruction, actual startup, applicability of standard) and 4 hours once per year to review the notification of compliance status for new process units (3 mills with new process units/3 years = 1).

[f] We estimate that it will take EPA personnel 2 hours once per year to complete review of the initial and periodic notifications of performance test/retest and performance evaluation. We estimate that 38 mills will submit notifications of initial/periodic performance test/retest and performance evaluation over the 3-year ICR period (test: 96 existing respondents/3 years = 32; retest: 20% x 35 = 6; total: 32 + 6 = 38).

[g] We estimate that it will take EPA personnel 8 hours two times per year to review the monitoring exceedances and periods of noncompliance in the excess emissions report for 5% of respondents (5% x 104 = 5).

[h] We estimate that it will take EPA personnel 2 hours two times per year to review the no exceedances report for 95% of respondents (95% x 96 = 91.2).

[i] We estimate that it will take EPA personnel 1 day per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip. Assuming an average of 4.3 tests/retests each year (3.2 tests + 0.6 retests = 3.8)(see footnotes c and d), the annual cost for travel expenses is $1,890 (3.8 tests/retests*($400+$50) = $1,710).

[j] Sum of labor and expenses. Total has been rounded to 3 significant figures. Figure may not add exactly due to rounding.

Appendix A – Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2020-0624)