

# U.S. Environmental Protection Agency

## Information Collection Request

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

**OMB Control Number:** 2060-0021

**EPA ICR Number:** 1055.14

### **Abstract:**

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR Part 60, Subpart BB were proposed on September 24, 1976, promulgated on February 23, 1978, and amended on April 4, 2014. These regulations apply to the following facilities at existing kraft pulp mills that commenced construction, reconstruction, or modification after September 24, 1976 and on or before May 23, 2013: recovery furnaces, smelt dissolving tanks, lime kilns, digester systems, brown stock washer systems, black liquor oxidation systems, multiple effect evaporator systems and condensate stripper systems. In pulp mills where kraft pulping is combined with neutral sulfite semi-chemical pulping, the provisions of this subpart are applicable when any portion of the material charged to an affected facility is produced by the kraft pulping operation. New facilities that commenced construction, modification or reconstruction after May 23, 2013 are subject to regulation under 40 CFR Part 60 Subpart BBa. This information is being collected to assure compliance with 40 CFR Part 60, Subpart BB.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

### **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.*

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The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy

requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, particulate matter (PM) and total reduced sulfur (TRS) emissions from kraft pulp mills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart BB.

## **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.

## **3. USE OF TECHNOLOGY**

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*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.*

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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.

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>.

Information contained in these reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by the EPA's Office of Compliance. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated authorities can edit, store, retrieve and analyze the data.

#### **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.*

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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 BUSINESSES AND SMALL ENTITIES**

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

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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. CONSEQUENCES 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.*

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The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1. 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 OMB guidelines.*

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

## **8. PUBLIC COMMENT AND CONSULTATIONS**

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### **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 (89 FR 63933) on August 6, 2024. 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 six 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 Paper Trade Association at [mbruno@gonpta.com](mailto:mbruno@gonpta.com), and the American Forest and Paper Association at [tim\\_hunt@afandpa.org](mailto:tim_hunt@afandpa.org). The American Forest and Paper Association confirmed that they do not expect any new Kraft pulp mills in the next three years, and that they estimate 85 current Kraft pulp mills.

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.*

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No payments or gifts are made to respondents.

#### **10. ASSURANCE OF CONFIDENTIALITY**

*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.*

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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.*

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

#### **12. RESPONDENT BURDEN HOURS & 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. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and then 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 kraft pulp mills. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the table below:

Standard (40 CFR Part 60, Subpart BB)	SIC Codes	NAICS Codes
Pulp Mills	2611	322110

Based on our research for this ICR, on average over the next three years, approximately 85 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject, for an overall total of 85 respondents per year. The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the Total Annual Responses table shown below. The number of Total Annual Responses is 340.

**12b. Information Requested**

In this ICR, all the data that are recorded or reported is required by the NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB). Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least two years following the date of such measurements, maintenance reports, and records.

A source must make the following reports:

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

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

A source must keep the following records:

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

### 12c. Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate a continuous monitoring system (CMS) to monitor and record opacity of gases discharged from any recovery furnace; the concentration of TRS emissions on a dry basis and the percent of oxygen by volume in the gases discharged from any lime kiln, recovery

<b>Respondent Activities</b>
furnace, digester system, brown stock washer system, multi-effect evaporator system or condensate stripper system; the combustion temperature at the point of incineration of effluent gases which are emitted from a digester system; the scrubbing liquid supply pressure and pressure loss of the gas stream to the scrubber emission control device that is discharged from any lime kiln or smelt dissolving tank.
Perform initial performance test, Reference Method 2, 3B, 5, 9, 16, 16A, 16B, and 17 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

#### **12d. Respondent Burden Hours and Labor Costs**

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

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 12,100 hours (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	\$172.41 (\$82.10 + 110%)
Technical	\$141.75 (\$67.50 + 110%)
Clerical	\$71.36 (\$33.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total

compensation.” The rates are 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.

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.

### **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.*

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

The total capital/startup costs for this ICR are \$0. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are \$4,700,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$4,700,000.

### **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*

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*as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

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#### **14a. Agency Activities**

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

- 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.

#### **14b. Agency Labor Cost**

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The average annual Agency burden and cost during the three years of the ICR is estimated to be 782 hours at a cost of \$43,500. See Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

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

Managerial	\$76.91 (GS-13, Step 5, \$48.07 + 60%)
Technical	\$57.07 (GS-12, Step 1, \$35.67 + 60%)
Clerical	\$30.88 (GS-6, Step 3, \$19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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 –NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal).

#### **14c. Agency Non-Labor Costs**

There are no non-labor costs to the Agency associated with this information collection.

#### **15) REASONS FOR CHANGE IN BURDEN**

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

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The adjustment decrease in burden from the most recently approved ICR is due to a decrease in the number of sources because of recent known facility closures. There is a slight increase in the operation and maintenance (O&M) costs due to O&M costs being updated from \$2009 to \$2023 using the CEPCI Index. There is also an increase in labor costs due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (December 2023) to calculate respondent burden costs. There are no capital costs associated with this information collection. The overall result is a decrease in burden hours and an increase in industry costs.

#### **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.*

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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 EXPIRATION DATE**

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

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EPA will display the expiration date for OMB approval of the information collection.

**18) CERTIFICATION STATEMENT**

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

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There are no exceptions to the topics of the certification statement.

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

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements <sup>c</sup>	1	1	1	85	85	4.3	8.5	\$13,388.05
B. Required activities								
Initial performance tests <sup>d</sup>	374	1	374	0	0	0	0	\$0
Repeat of performance tests <sup>e</sup>	374	0.2	74.8	0	0	0	0	\$0
C. Gather existing information	See 3B							
D. Write Report								
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration	2	1	2	0	0	0	0	\$0
Notification of physical changes	2	1	2	0	0	0	0	\$0
Notification of opacity or visible emissions observations	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Semiannual report <sup>f</sup>	8	2	16	85	1,360	68	136	\$214,208.84
Excess emissions report <sup>g</sup>	8	2	16	85	1,360	68	136	\$214,208.84
<b>Subtotal for Reporting Requirements</b>						<b>3,226</b>		<b>\$441,806</b>

4. Recordkeeping requirements								
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 3A							
C. Implement Activities	See 3A							
D. Develop record system	N/A							
E. Time to enter and transmit information								
Records of operating parameters <sup>h</sup>	0.25	365	91.25	85	7,756	388	776	\$1,221,659.79
<b>Subtotal for Recordkeeping Requirements</b>					<b>8,920</b>		<b>\$1,221,660</b>	
<b>Total Labor Burden and Costs (rounded)<sup>j</sup></b>					<b>12,100</b>		<b>\$1,660,000</b>	
<b>Total Capital and O&amp;M Cost (rounded)<sup>j</sup></b>								<b>\$4,700,000</b>
<b>GRAND TOTAL (rounded)<sup>j</sup></b>					<b>12,100</b>		<b>\$6,360,000</b>	

**Assumptions:**

<sup>a</sup> We have assumed an average of 85 existing respondents per year over the next three years. No new respondents are anticipated over the next three years.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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.

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

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

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

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

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

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

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

**Table 2: Average Annual EPA Burden and Cost – NSPS for Kraft Pulp Mills (40 CFR Part 60, Subpart BB) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
Initial performance test (new plant) <sup>c</sup>	24	1	24	0	0	0	0	\$0
Repeat performance test (new plant) <sup>d</sup>	24	0.2	4.8	0	0	0	0	\$0
Review reports (new plant)								
Notification of construction	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of CMS demonstration	0.5	1	0.5	0	0	0	0	\$0
Notification of physical/operational changes	0.5	1	0.5	0	0	0	0	\$0
Notification of opacity or visible emissions observations	0.5	1	0.5	0	0	0	0	\$0
Review test results	8	1.2	9.6	0	0	0	0	\$0
Existing plants								
Semiannual report and excess emissions report <sup>e</sup>	4	2	8	85	680	34	68	\$43,522.38
<b>TOTAL (rounded)<sup>f</sup></b>						<b>782</b>		<b>\$43,500</b>

**Assumptions:**

<sup>a</sup> We have assumed an average of 85 existing respondents per year over the next three years. No new respondents are anticipated over the next three years.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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

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

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

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

## Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>1</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	85	0	0	85
2	0	85	0	0	85
3	0	85	0	0	85
Average	0	85	0	0	85

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

### 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	85	2	0	170
Excess emissions report	85	2	0	170
		<b>Total (rounded)</b>		<b>340</b>

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent <sup>a</sup>	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent <sup>a</sup>	Number of Respondents with O&M	Total O&M, (ExF)
Opacity monitor	\$61,153	0	\$0	\$13,148	85	\$1,117,580
TRS monitor	\$165,114	0	\$0	\$35,163	85	\$2,988,876
Incinerator temperature monitor	\$13,148	0	\$0	\$7,033	85	\$597,775
Scrubber liquid supply pressure monitor	\$535	0	\$0	\$0	0	\$0
Scrubber liquid flow rate monitor	\$23,697	0	\$0	\$0	0	\$0
<b>Total</b>			<b>\$0</b>			<b>\$4,700,000</b>

<sup>a</sup> Capital/Startup and Annual O&M costs have been updated from 2009 to 2023 using the CEPCI Index.

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