

ICR Summary Information

| | |
|------------------------------|----------------|
| Hours Per Response | 36 |
| Number of Respondents | 85 |
| Total Estimated Burden Hours | 12,100 |
| Total Estimated Costs | \$6,360,000 |
| Annualized Capital O&M | \$4,700,000 |
| Form Number | Not Applicable |

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

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (C = A x B) | (D) Respondents per year ^a |
|--|--|---|---|---|
| 1. Applications | N/A | | | |
| 2. Survey and Studies | N/A | | | |
| 3. Reporting requirements | | | | |
| A. Familiarization with rule requirements ^c | 1 | 1 | 1 | 85 |
| B. Required activities | | | | |
| Initial performance tests ^d | 374 | 1 | 374 | 0 |
| Repeat of performance tests ^e | 374 | 0.2 | 74.8 | 0 |
| C. Gather existing information | See 3B | | | |
| D. Write Report | | | | |
| Notification of construction/ reconstruction | 2 | 1 | 2 | 0 |
| Notification of performance test | 2 | 1.2 | 2.4 | 0 |
| Notification of actual startup | 2 | 1 | 2 | 0 |
| Notification of CMS demonstration | 2 | 1 | 2 | 0 |
| Notification of physical changes | 2 | 1 | 2 | 0 |
| Notification of opacity or visible emissions observations | 2 | 1 | 2 | 0 |
| Report of performance test | See 3B | | | |
| Semiannual report ^f | 8 | 2 | 16 | 85 |
| Excess emissions report ^g | 8 | 2 | 16 | 85 |
| Subtotal for Reporting Requirements | | | | |
| 4. Recordkeeping requirements | | | | |
| A. Familiarization with rule requirements | See 3A | | | |
| B. Plan activities | See 3A | | | |
| C. Implement Activities | See 3A | | | |
| D. Develop record system | N/A | | | |
| E. Time to enter and transmit information | | | | |
| Records of operating parameters ^h | 0.25 | 365 | 91.25 | 85 |
| Subtotal for Recordkeeping Requirements | | | | |
| Total Labor Burden and Costs (rounded) ^j | | | | |
| Total Capital and O&M Cost (rounded) ^j | | | | |
| GRAND TOTAL (rounded) ^j | | | | |

Assumptions:

^a We have assumed an average of 85 existing respondents per year over the next three years. No new respondents are a

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and United States Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational compensation.” The rates are increased by 110 percent to account for varying industry wage rates and the additional costs and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c We have assumed that each source will re-familiarize with the requirements each year.

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

- ^e We have assumed that 20 percent of new respondents would repeat performance test due to failure.
- ^f We have assumed that all respondents will each take eight hours to complete the semiannual report.
- ^g We have assumed that each respondent will take eight hours to two times per year to complete the excess emissions r
- ^h We have assumed that it will take each respondent 15 minutes per day to record operating parameters.
- ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

, Subpart BB) (Renewal)

| (E) Technical person- hours per year (E = C x D) | (F) Management person hours per year (E x 0.05) | (G) Clerical person hours per year (E x 0.1) | (H) Total Cost Per year ^b |
|--|---|--|--|
| | | | |
| | | | |
| 85 | 4.3 | 8.5 | \$13,388.05 |
| | | | |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| | | | |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | \$0 |
| | | | |
| 1,360 | 68 | 136 | \$214,208.84 |
| 1,360 | 68 | 136 | \$214,208.84 |
| 3,226 | | | \$441,806 |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| 7,756 | 388 | 776 | \$1,221,659.79 |
| 8,920 | | | \$1,221,660 |
| 12,100 | | | \$1,660,000 |
| | | | \$4,700,000 |
| 12,100 | | | \$6,360,000 |

| Labor Rates | |
|--------------------|----------|
| Management | \$172.41 |
| Technical | \$141.75 |
| Clerical | \$71.36 |

Responses 340
Hours/response 36

nticipated over the next three years.
and Clerical \$71.36 (\$33.98 + 110%). These rates are from the
ional and industry group.” The rates are from column 1, “Total
overhead business costs of employing workers beyond their wages

eport.

Table 2: Average Annual EPA Burden and Cost - NSPS for Kraft Pulp Mills (40 CFR Par

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

Assumptions:

^a We have assumed an average of 85 existing respondents per year over the next three years. No new respondents a

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased t employees.

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

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

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

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

t 60, Subpart BB) (Renewal)

| (D) | (E) | (F) | (G) | (H) |
|------------------------------|--|---|--|-----------------------|
| Plants per year ^a | Technical person- hours per year (E=CxD) | Management person-hours per year (Ex0.05) | Clerical person-hours per year (Ex0.1) | Cost, \$ ^b |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 0 | 0 | 0 | 0 | \$0 |
| 85 | 680 | 34 | 68 | \$43,522.38 |
| | 782 | | | \$43,500 |

| Labor Rates | |
|--------------------|---------|
| Management | \$76.91 |
| Technical | \$57.07 |
| Clerical | \$30.88 |

re anticipated over the next three years.

Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 10 percent of Technical hours. These rates are from the Office of Personnel Management by 60 percent to account for the benefit packages available to government

twenty-four hours for Agency observation of a repeat of the performance test due

s report.

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

| (A) | (B) | (C) | (D) | (E) |
|---|--|---------------------------|-------------------------------------|--|
| Continuous Monitoring Device | Capital/Startup Cost for One Respondent ^a | Number of New Respondents | Total Capital/Startup Cost, (B X C) | Annual O&M Costs for One Respondent ^a |
| Opacity monitor | \$61,153 | 0 | \$0 | \$13,148 |
| TRS monitor | \$165,114 | 0 | \$0 | \$35,163 |
| Incinerator temperature monitor | \$13,148 | 0 | \$0 | \$7,033 |
| Scrubber liquid supply pressure monitor | \$535 | 0 | \$0 | \$0 |
| Scrubber liquid flow rate monitor | \$23,697 | 0 | \$0 | \$0 |
| Total | | | \$0 | |

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

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

| :S | |
|--------------------------------|--------------------|
| (F) | (G) |
| Number of Respondents with O&M | Total O&M, (ExF) |
| 85 | \$1,117,580 |
| 85 | \$2,988,876 |
| 85 | \$597,775 |
| 0 | \$0 |
| 0 | \$0 |
| | \$4,700,000 |

| CEPCI Index | |
|-------------|-------|
| Year | Index |
| 2009 | 521.9 |
| 2023 | 797.9 |

| Number of Responder | | | |
|----------------------------|--|--------------------------------|--|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports |
| | (A) | (B) | (C) |
| Year | Number of New Respondents ¹ | Number of Existing Respondents | Number of Existing Respondents that keep records but do not submit reports |
| 1 | 0 | 85 | 0 |
| 2 | 0 | 85 | 0 |
| 3 | 0 | 85 | 0 |
| Average | 0 | 85 | 0 |

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

nts

| (D) | (E) |
|--|-----------------------------------|
| Number of Existing Respondents That Are Also New Respondents | Number of Respondents (E=A+B+C-D) |
| 0 | 85 |
| 0 | 85 |
| 0 | 85 |
| 0 | 85 |

| 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 |
| | | Total (rounded) | | 340 |