SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Renewal), EPA ICR Number 1984.06, OMB Control Number 2060-0552

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Products (40 CFR Part 63 Subpart DDDD) were proposed on January 9, 2003, promulgated on July 30, 2004, and most-recently amended on October 29, 2007. These regulations apply to both new and existing plywood and composite wood products (PCWP) facilities that are a major source of hazardous air pollutants (HAP). A PCWP manufacturing facility is a major source of HAP emissions either in and of itself, or because it is located with other major sources of HAP. Plywood and composite products include, but are not limited to: plywood; veneer; particleboard; oriented strand board; hardboard; fiberboard; medium density fiberboard; laminated strand lumber; laminated veneer lumber; wood I-joists; kiln-dried lumber; and glue-laminated beams. New facilities include those that commenced construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart DDDD.

In general, all NESHAP standards require initial notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such maintenance reports and records. All 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 U.S. Environmental Protection Agency (EPA) regional office.

All of the plywood and composite products facilities in the United States are owned and operated by the plywood and composite industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either 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 to EPA inquiries. The “burden” to the Affected Public may be found below in

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

Over the next three years, approximately 228 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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

> When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC by reviewing existing burden and universe estimates and consulting with EPA's internal experts. All calculations were updated with the most recent information.

2. Need for and Use of the Collection

2(a) Need/Authority for 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 from PCWP facilities which include

acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde 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 DDDD

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these 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 these 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 these 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 standard is 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart DDDD.

3(a) Non-duplication

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 similar 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.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (81 FR 26546) on May 3, 2016. No comments were received on the

burden published in the Federal Register.

3(c) Consultations

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 these standards, 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.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the Composite Panel Association (CPA), at jmorrill@cpamail.org; and 2) the Harwood Plywood and Veneer Association (HPVA), at khowlett@hpva.org.

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.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

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.

3(f) Confidentiality

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 (CBI) (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).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are PCWP facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding to the North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 63, Subpart DDDD)	SIC Codes	NAICS Codes
All Other Miscellaneous Wood Product Manufacturing	2421, 2429, 2499, 2517, 3131, 3999	321999
Hardwood Veneer and Plywood Manufacturing	2435	321211
Softwood Veneer and Plywood Manufacturing	2436	321212
Reconstituted Wood Product Manufacturing	2493	321219
Engineered Wood Member (except truss) Manufacturing	2439	321213

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD).

A source must make the following reports:

Notifications	
Initial notification for existing sources	63.9(b)(2), 63.2280(a)-(b)
Notification of construction/reconstruction	63.9(b)(4)-(5), 63.2280(a)
Notification that source is subject to special compliance requirements	63.9(d), 63.2280(a)
Notification of performance test	63.7(b)(1), 63.9(e), 63.2280(a), (c)
Notification of compliance status	63.9(h)(2)(ii), 63.2280(a) & (d)
Request for routine control device maintenance exemption	63.2280(e)
Emissions averaging plan	63.2280(f)
Notification of change of control system, processing unit in your emissions averaging plan, monitoring parameter, or value of a monitoring parameter	63.2280(g)

Reports	
Semiannual compliance report	63.2281(a)-(b)
Start-up, shutdown, and malfunction plan	63.10(d)(5), 63.2281(a)

A source must keep the following records:

Recordkeeping	
Documentation supporting any initial notification or notification of compliance status	63.10(b)(2)(xiv), 63.2282(a)(1)
Startup, shutdown, malfunction plan	63.6(e)(3)(iii)-(v), 63.2282(a)(2)
Records relating to control device maintenance and documentation of routine control device maintenance exemption	63.2282(a)(3)
Records of performance test and performance evaluations	63.10(b)(2)(viii), 63.2282(a)(4)
Records for each CEMS for emission limitations and records related to the work practice requirements	63.10(b)(2)(vi)-(xi), 63.8(d)(3), 63.8(f)(6)(i), 63.2282(b)-(c)

Recordkeeping	
Records of all information required to calculate emission debits and credits	63.2282(d)
Maintain records for 5 years	63.10(b)(1), 63.2283(b)

Electronic Reporting

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 308, 316, 320 test, 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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information

Management

5(a) 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.

5(b) Collection Methodology and Management

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 standards 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. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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.

5(c) Small Entity Flexibility

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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Renewal).

6. Estimating the Burden and Cost of the Collection

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 Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 11,900 hours (Total Labor Hours from Table 1 below). 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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$138.43 ($65.92+ 110%)
Technical	$106.45 ($50.69 + 110%)
Clerical	$52.77 ($25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

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

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

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

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous monitoring system	$1,880	0	$0	$70	228	$15,960
Totals			$0			$16,000

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

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $16,000. 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 $16,000. These are recordkeeping costs.

6(c) Estimating Agency Burden and 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 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 cost during the three years of the ICR is estimated to be $36,600.

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

Managerial $64.16 (GS-13, Step 5, $40.10 + 60%)

Technical	$47.62 (GS-12, Step 1, $29.76 + 60%)
Clerical	$25.76 (GS-6, Step 3, $16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 228 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 228 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	0	228	0	0	228
2	0	228	0	0	228
3	0	228	0	0	228
Average	0	228	0	0	228

[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 228.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D

Total Annual Responses				
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of applicability of standard	0	1	0	0
Emissions averaging plan	0	1	0	0
Request for routing control system maintenance exemption	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of compliance status with performance test	0	1	0	0
Notification of compliance status without performance test	0	1	0	0
Initial compliance report with no deviations	0	1	0	0
Initial compliance report with deviations	0	1	0	0
Initial compliance startup, shutdown, malfunction report	0	1	0	0
Initial compliance emissions averaging report	0	1	0	0
Semiannual report with no deviations	205	2	0	410
Semiannual report with deviations	23	2	0	46
Semiannual startup, shutdown, malfunction report	23	2	0	46
Semiannual control system maintenance report	23	2	0	46
Semiannual emissions averaging report	0	0	0	0
Total Number of Annual Responses			Total	548

The number of Total Annual Responses is 548.

The total annual labor costs are $1,230,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 11,900 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (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 22 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $16,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 789 labor hours at a cost of $36,600. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (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.

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated labor hours as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the labor burden and cost estimates occurred because of a change in assumption. This ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year. In addition, there is a small increase in O&M cost due to rounding of total cost figure to three significant figures.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 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-OECA-2013-0341. 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), WJC 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) 566-1752. 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-OECA-2013-0341 and OMB Control Number 2060-0552 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (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-hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements [c]	1	1	1	228	228	11.4	22.8	$27,051.86
B. Required activities	N/A							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
1) Notification of construction /reconstruction	2	1	2	0	0	0	0	$0
2) Notification of anticipated startup	2	1	2	0	0	0	0	$0
3) Notification of actual startup	2	1	2	0	0	0	0	$0
4) Notification of applicability of standard	2	1	2	0	0	0	0	$0
5) Emissions averaging plan [d]	120	1	120	0	0	0	0	$0
6) Request for routine control system maintenance exemption [e]	2	1	2	0	0	0	0	$0
7) Notification of initial performance test [f]	2	1	2	0	0	0	0	$0
8) Notification of compliance status								
a. With performance test [f]	80	1	80	0	0	0	0	$0

b. Without performance test [g]	120	1	120	0	0	0	0	$0
9) Initial compliance report [h]								
a. No deviations [i]	2	1	2	0	0	0	0	$0
b. Deviations [i]	24	1	24	0	0	0	0	$0
c. Startup, shutdown, malfunction report [j]	8	1	8	0	0	0	0	$0
d. Control system maintenance report [k]	8	1	8	0	0	0	0	$0
e. Emissions averaging report [l]	8	1	8	0	0	0	0	$0
10) Semiannual compliance report [h]								
a. No deviations [i]	8	2	16	205	3280	164	328	$389,167.08
b. Deviation [i]	24	2	48	23	1104	55.2	110.4	$130,987.94
c. Startup, shutdown, malfunction report [j]	8	2	16	23	368	18.4	36.8	$43,662.65
d. Control system maintenance report [k]	8	2	16	23	368	18.4	36.8	$43,662.65
e. Emissions averaging report [l]	20	1	20	0	0	0	0	$0
Subtotal for Reporting Requirements					**6,150**			**$634,532**
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements [c]	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system [m]	40	1	40	0	0	0	0	$0
E. Develop startup, shutdown, malfunction plan [n]	100	1	100	0	0	0	0	$0
F. Time to enter information								
1) Records of startup, shutdown, and malfunction	1.5	52	78	0	0	0	0	$0
2) Records of continuous compliance [o]								
a. Record parameters	0.25	365	91.25	23	2098.75	104.94	209.88	$249,013.54

/information								
b. Compile data	24	2	48	23	1104	55.2	110.4	$130,987.94
c. Enter/verify information for semiannual reports	16	2	32	23	736	36.8	73.6	$87,325.30
3) Records of control system maintenance	See 3E							
4) Records of emissions averaging credit/debts	See 3E							
G. Calibration of CMS [p]	16	1	16	23	368	18.4	36.8	$43,662.65
H. Time to train personnel [q]	40	1	40	0	0	0	0	$0
I. Time to refresher training for personnel [r]	16	1	16	46	736	36.8	73.6	$87,325.30
J. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**5,799**			**$598,315**
TOTAL LABOR BURDEN AND COST (rounded) [s]					**11,900**			**$1,230,000**
CAPITAL AND O&M COST (rounded) [s]								**$16,000**
GRAND TOTAL (rounded) [s]								**$1,250,000**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 228. There will be no new additional sources during the next three years of this ICR.

[b] This ICR uses the following labor rates: $138.43 per hour for Executive, Administrative, and Managerial labor; $106.45 per hour for Technical labor, and $52.77 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, Table 2. Civilian Workers, by Occupational and Industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that all respondents will have to familiarize with the regulatory requirements each year.

[d] We have assumed that no existing facilities will choose to use the emission averaging plan because all facilities we assume will install control systems and new facilities are not allowed to use emissions averaging.

[e] We have assumed that each new respondent will submit a request for routine control device maintenance exemption. Note, this is a one-time activity for each respondent.

[f] We have assumed that each new facility will comply by conducting performance test(s). The notification of compliance status includes the report of the performance test(s).

[g] We have assumed that it will take 120 hours to submit a notification of compliance status without performance test(s).

[h] We have assumed that the respondents' compliance date is in the first half of the year, so respondents will submit one compliance report the first year that they start complying with the rule and two compliance reports the following year.
[i] We have assumed that 90 percent of facilities will have no deviation, and 10 percent will have deviation.
[j] We have assumed that 10 percent of respondents will report an action taken during startup, shutdown, malfunction that are not consistent with the SSMP.
[k] We have assumed that 10 percent of the facilities will submit control device maintenance report.
[l] We have assumed that no existing facilities will choose to use the emissions averaging option, and since new facilities are not allowed to use emissions averaging, there will be no need to obtain emissions averaging report.
[m] We have assumed that it will take each new respondent 40 hours to develop a record system for recording parameter monitoring information.
[n] We have assumed that it will take 80 hours to draft the startup, shutdown, malfunction plan, and another 20 hours to review/revisions, for a total of 100 hours.
[o] Records of continuous compliance includes, records of CMS data for emission limitations and various records for work practice standards.
[p] We have assumed that calibration of the CMS will require eight hours per year for each monitor, assuming two CMS per facility for a total of 16 hours per year.
[q] We have assumed that it will take 40 hours for each new personnel to be trained.
[r] We have assumed that it will take 16 hours for personnel to complete refresher training and that 20 percent of the personnel will participate (228x20%=~46).
[s] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Plywood and Composite Products (40 CFR Part 63, Subpart DDDD) (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-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total Cost per year, $ [b]
1. Report review								
A. Notification of construction/reconstruction [c]	2	1	2	0	0	0	0	$0
B. Notification of anticipated startup [c]	2	1	2	0	0	0	0	$0
C. Notification of actual startup [c]	2	1	2	0	0	0	0	$0
D. Notification of applicability of standard [c]	2	1	2	0	0	0	0	$0
E. Review of emissions averaging plan [d]	40	1	40	0	0	0	0	$0
F. Review of request for routine control system maintenance exemption [e]	2	1	2	0	0	0	0	$0
G. Notification of initial performance test [f]	2	1	2	0	0	0	0	$0
H. Notification of compliance status								
1) With performance test [g]	40	1	40	0	0	0	0	$0
2) Without performance test [h]	40	1	40	0	0	0	0	$0
I. Review of initial compliance report [i]								
1) No deviations [j]	2	1	2	0	0	0	0	$0
2) Deviations [j]	8	1	8	0	0	0	0	$0
3) Startup, shutdown, malfunction report [k]	2	2	4	0	0	0	0	$0
4) Control system maintenance report [l]	2	1	2	0	0	0	0	$0
5) Emissions averaging report [d]	8	1	8	0	0	0	0	$0
J. Review of semiannual compliance report								

1) No deviations [j]	2	1	2	205	410	20.5	41	$21,895.64
2) Deviations [j]	8	1	8	23	184	9.2	18.4	$9,826.34
3) Startup, shutdown, and malfunction reports [k]	2	1	2	23	46	2.3	4.6	$2,456.58
4) Control system maintenance report [l]	2	1	2	23	46	2.3	4.6	$2,456.58
5) Emissions averaging report [d]	8	1	8	0	0	0	0	$0
TOTAL ANNUAL BURDEN AND COST(rounded) [l]					**789**			**$36,600**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 228. There will be no new additional sources during the next three years of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $64.16 Managerial rate (GS-13, Step 5, $40.10 x 1.6), $47.62 Technical rate (GS-12, Step 1, $29.76 x 1.6), and $25.76 Clerical rate (GS-6, Step 3, $16.10 x 1.6). These rates are from the Office of Personnel Management (OPM) 2016 General Schedule which excludes locality rates of pay.

[c] We have assumed that there will be no new or reconstructed facilities during the next three years of this ICR.

[d] We have assumed that no existing facilities will choose to use the emission averaging plan because we assume that all facilities will install control systems, and new facilities are not allowed to use emissions averaging..

[e] We have assumed that all new facilities will have submitted a request for routine control system maintenance exemption.

[f] We have assumed that it will take each new respondent two hours to review the notification of initial performance test.

[g] We have assumed that all new facilities will conduct an initial performance test(s) and submit a notification of compliance status that includes the report of the performance test(s).

[h] We have assumed that one new facility per year with softwood veneer dryers will submit a notification of compliance status without performance test.

[i] We have assumed that the facilities compliance date is in the first half of the year, so facilities will submit one compliance report the first year that they start complying with the rule and two compliance reports the years that follow.

[j] We have assumed that 90 percent of facilities will have no deviations, and 10 percent will have deviations

[k] We have assumed that each respondent will report any action taken during a startup, shutdown, or malfunction that are consistent with the SSMP.

[l] Totals have been rounded to 2 significant figures. Figures may not add exactly due to rounding.