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 1984.08, 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. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, 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 January 9, 2003. This information is being collected to assure compliance with 40 CFR Part 63, Subpart DDDD.

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 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 either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency's (EPA) regional offices.

Nearly all the PCWP facilities in the United States are owned and operated by the

plywood and composite industry (aka: the "Affected Public"). With one exception, 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. Only one lumber facility is owned by a tribal government. We assume that they will all respond to EPA inquiries. The "burden" to the Affected Public may be found at the end of this document 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 at the end of this document 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 244 respondents per year will be subject to these standards. This includes 243 existing respondents per year and an average of 1 additional respondent per year that will become subject to these same standards. There are 113 existing PCWP facilities and 130 existing lumber mills subject to the PCWP NESHAP. EPA expects that 2 new greenfield PCWP mills, 5 new PCWP process lines at existing PCPW mills, and 39 new lumber kilns at existing sawmills will be built during the three-year period of this ICR, for an average of one new respondent. These estimates, which represent an increase in the number of respondents from the previously-approved ICR, are based on Agency analyses conducted during the development the Risk and Technology Review for this subpart.

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

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, hazardous air pollutant emissions from PCWP manufacturing facilities 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 these 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 either the Agency or its delegated authority when a source becomes subject to the requirements of these 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 that these same 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. 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 either 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* (84 FR 19777) on May 6, 2019. No comments were received on the burden published in the *Federal Register* for this renewal.

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 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 244 respondents will be subject to these standards over the three-year period covered by this ICR.

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 that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Wood Protection Association, at (205) 733-4077, and the Decorative Hardwoods Association, at (703) 435-2900.

In addition, in 2017 the EPA/OAQPS conducted an ICR, concluding in 2018, to gather both process and emissions data from the PCWP industry for rulemaking purposes (referred to as the "2017/2018 ICR"). The results from this ICR were used in updating the burden estimates contained in this supporting statement.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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 either 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 manufacturing 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 (including sawmills with lumber kilns)	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 are 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 notifications and 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)-(g)
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)

Recordkeeping	
	(i), §§63.2282(b)-(c)
Records of all information required to calculate emission debits and credits	§63.2282(d)
Records of annual catalyst activity checks and subsequent corrective actions.	§63.2282(e)
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.
Perform initial performance test, Reference Method 1 or 1A, 2, 2A, 2C, 2D, 3, 3A, 3B, 4, 18, 25A, 204, 204A through 204F, 308, 316, 320, and ASTM D6348-03 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.

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
Observe initial and repeat performance tests.
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. The 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

The 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 this 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 at the end of this document 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 29,900 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of this 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	$148.97 ($70.94+ 110%)
Technical	$119.03 ($56.68 + 110%)
Clerical	$57.62 ($27.44 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2018, "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 this regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors 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 [a]	$2,240	7	$15,680	$84	114	$9,576
Initial tests at new mills (inlet/outlet) [b]	$60,000	2	$120,000			$0
Initial tests on new process lines at existing mills (inlet/outlet) [b]	$30,000	5	$150,000			$0
Total [c]			**$286,000**			**$9,580**
Average capital/ startup + O&M cost for 3-year period [c, d]						**$105,000**

[a] Based on average number of PCWP facility respondents over the 3-year period (113 + 113 + (113+2)) / 3 = 114. Annual O&M costs are not required for lumber mills.

[b] Estimated based on a test cost of $30,000 for each inlet/outlet test for 2 emission points at each facility for a total of $60,000 per facility (except 1 emission point is assumed for new process lines at existing facilities for a testing cost of $30,000).

[c] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

[d] Calculated as the Total Capital Startup Costs (column D) divided by 3 years plus the column G total annual cost.

The total capital/startup costs for this ICR are $286,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $9,580. 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 $105,000. These are the 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 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 $48,600.

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

Managerial	$65.71 (GS-13, Step 5, $41.07 + 60%)
Technical	$48.75 (GS-12, Step 1, $30.47 + 60%)
Clerical	$26.38 (GS-6, Step 3, $16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal 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 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 244 respondents will be subject to these standards. There are 113 existing PCWP facilities and 130 existing lumber mills subject to the PCWP NESHAP, for a total of 243 existing respondents. Two new greenfield PCWP facilities (new respondents) are projected to come online during the three-year period and five new process lines are projected to be installed at existing PCWP facilities (existing respondents that are also new respondents). Thus, it is estimated that an average of two additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 244 per year. The average number of respondents is calculated using the following table that addresses the 3 years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New	(B) Number of	(C) Number of Existing	(D) Number of	(E) Number of

Number of Respondents					
	Respondents [a]	Existing Respondents	Respondents that keep records but do not submit reports	Existing Respondents That Are Also New Respondents	Respondents (E=A+B+C-D)
1	0	243	0	0	243
2	0	243	0	0	243
3	7	243	0	5	245
Average	2	243	0	2	244

[a] New respondents include sources with constructed, reconstructed and modified affected facilities. The 7 new respondents in year 3 consist of 2 new greenfield PCWP facilities and 5 new process lines to be installed at existing PCWP 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 244.

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	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	15	1	0	15
Notification of anticipated startup	15	1	0	15
Notification of actual startup	15	1	0	15
Notification of applicability of standard	15	1	0	15
Emissions averaging plan	0	1	0	0
Request for routine control system maintenance exemption	2	1	0	2
Notification of initial performance test	2	1	0	2
Notification of compliance status with performance test	2	1	0	2
Notification of compliance status without performance test	0	1	0	0
Initial compliance report with no deviations	2	1	0	2
Initial compliance report with deviations	0	1	0	0
Initial compliance startup, shutdown, malfunction report	0	1	0	0
Initial compliance control system maintenance report	0	1	0	0
Initial compliance emissions averaging report	0	1	0	0
Semiannual report with no deviations	102	2	0	204
Semiannual report with deviations	11	2	0	22

Semiannual startup, shutdown, malfunction report	11	2	0	22
Semiannual control system maintenance report	11	2	0	22
Semiannual emissions averaging report	1	2	0	2
			Total	340

The number of Total Annual Responses is 340.

The total annual labor costs are $3,440,000. Details regarding these estimates may be found at the end of this document 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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 29,900 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 88 hours per response.

The average annual capital/startup and O&M costs to the regulated entity are $105,000. 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 1,020 labor hours at a cost of $48,600; 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 burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment increase in burden is due to several factors. The Agency developed a more accurate estimate of existing and anticipated new sources during the development of the proposed Risk and Technology Review for this subpart. The increase in the number of existing sources led to an increase in burden hours and costs for labor and operation and maintenance. The increase in the number of new sources led to an increase in burden hours and costs for labor, capital, performance testing, and operation and maintenance. New sources are required to purchase and install CMS, conduct performance testing, and send several notifications and reports to EPA. O&M costs for existing sources were updated to reflect more accurate costs for these O&M activities. Also, in the previous ICR, it was assumed that only 10% of sources kept daily records of continuous compliance and annual records of calibration of their CMS; we have corrected this assumption to reflect that 100% of PCWP facilities keep these records. The overall result is an increase in burden hours and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 88 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(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	244	244	12	24	$32,266.68
B. Required activities	N/A							
C. Create information	See 3E							
D. Gather existing information	See 3E							
E. Write report								
1) Notification of construction /reconstruction [d]	2	1	2	15	30	2	3	$3,967.22
2) Notification of anticipated startup [d]	2	1	2	15	30	2	3	$3,967.22
3) Notification of actual startup [d]	2	1	2	15	30	1.5	3	$3,967.22
4) Notification of applicability of standard [d]	2	1	2	15	30	2	3	$3,967.22
5) Emissions averaging plan [e]	120	1	120	0	0	0	0	$0
6) Request for routine control system maintenance exemption [f]	2	1	2	2	4	0	0	$528.96
7) Notification of initial performance	2	1	2	2	4	0	0	$528.96

test [g]								
8) Notification of compliance status								
a. With performance test [g]	80	1	80	2	160	8	16	$21,158.48
b. Without performance test [h]	60	1	60	0	0	0	0	$0
9) Initial compliance report [i]								
a. No deviations [j]	2	1	2	2	4	0.2	0.4	$528.96
b. Deviations [j]	24	1	24	0	0	0	0	$0
c. Startup, shutdown, malfunction report [k]	8	1	8	0	0	0	0	$0
d. Control system maintenance report [l]	8	1	8	0	0	0	0	$0
e. Emissions averaging report [m]	8	1	8	0	0	0	0	$0
10) Semiannual compliance reports [i]								
a. No deviations [j]	8	2	16	102	1,627	81	163	$215,181.74
b. Deviation [j]	24	2	48	11	542	27	54	$71,727.25
c. Startup, shutdown, malfunction report [k]	8	2	16	11	181	9	18	$23,909.08
d. Control system maintenance report [l]	8	2	16	11	181	9	18	$23,909.08
e. Emissions averaging report [m]	20	1	20	1	20	1	2	$2,644.81
Subtotal for Reporting Requirements					***3,550***			***$408,253***
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 [n]	40	1	40	2	80	4	8	$10,579.24
E. Develop startup, shutdown, malfunction plan [o]	100	1	100	2	200	10	20	$26,448.10

F. Time to enter information								
1) Records of startup, shutdown, and malfunction [k]	1.5	52	78	11.3	881.4	44	88	$116,556.78
2) Records of continuous compliance for PCWP facilities [p]								
a. Record parameters /information	0.25	365	91	114	10,403	520	1040	$1,375,631.80
b. Compile data	24	2	48	114	5,472	274	547	$723,620.02
c. Enter/verify information for semiannual reports	16	2	32	114	3,648	182	365	$482,413.34
3) Records of control system maintenance	See 3E							
4) Records of emissions averaging credit/debts	See 3E							
G. Calibration of CMS [q]	16	1	16	114	1,824	91	182	$241,206.67
H. Time to train personnel [r]	40	1	40	2	80	4	8	$10,579.24
I. Time to refresher training for personnel [s]	16	1	16	23	368	18	37	$48,664.50
J. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***26,399***			***$3,035,700***
Total Labor Burden and Costs (rounded) [t]					**29,900**			**$3,440,000**
Total Capital and O&M Cost (rounded) [t]								**$105,000**
Grand Total (rounded) [t]								**$3,550,000**

Assumptions:

[a] The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including 243 existing respondents in years 1-3, plus 2 new respondents projected to become subject to the rule in year 3 for an average of 244 = [243 (yr 1)+ 243 (yr 2) + 245 (yr 3)]/3. There are 113 existing PCWP facilities and 130 existing lumber mills subject to the PCWP NESHAP. During the three-year period of this ICR, an average of 1 new PCWP facility will become subject each year (2/3=1 (rounded)). Therefore, there will be an average of 114 PCWP facilities (113 existing + 1 new = 114). Although subject to the rule, lumber mills are only required to submit an initial notification.

[b] This ICR uses the following labor rates: $148.97 per hour for managerial labor; $119.03 per hour for technical labor, and $57.62 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2018, 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] This ICR assumes that all respondents will have to familiarize with the regulatory requirements each year.

[d] One-time activity for new sources projected to commence construction over the 3-year ICR period, including 2 new PCWP mills, 5 new PCWP process lines at existing PCPW mills, and 39 new lumber kilns at existing sawmills, for an average of 15 affected sources per year. [(2 + 5 + 39) /3 = 15]

[e] The one existing PCWP facility using the emissions averaging compliance option has already written and submitted its emissions averaging plan. New PCWP facilities are not allowed to use emissions averaging.

[f] We have assumed that each new PCPW mill respondent will submit a request for routine control device maintenance exemption. Note, this is a one-time activity for each respondent. Two new PCWP mills and 5 new process lines are projected over the 3-year ICR period for an average of (2 + 5) / 3 = 2 new PCWP respondents per year.

[g] We have assumed that each new PCWP facility will comply by conducting performance tests. Two new PCWP mills and 5 new process lines are projected over the 3-year ICR period for an average of (2 + 5) / 3 = 2 new PCWP respondents per year. The notification of compliance status includes the report of the performance tests. Lumber mills are not required to conduct performance tests.

[h] 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).

[i] We have assumed that the respondents' compliance date is in the first half of the year, so respondents will submit one compliance report (initial compliance report) the first year that they start complying with the rule and two compliance reports (semiannual compliance reports) the following year.

[j] We have assumed that 90 percent of new and existing PCWP facilities will have no deviations, and 10 percent will have deviations. [0.9 x 2 new PCWP mills = 2] and [0.1 x 2 new PCWP mills = 0] and [0.9 x 113 existing PCWP mills = 102] and [0.1 x 113 existing PCWP mills = 11]

[k] We have assumed that 10 percent of the PCWP facilities will report an action taken during startup, shutdown, malfunction that are not consistent with the SSMP.

[l] We have assumed that 10 percent of the PCWP facilities will submit control system maintenance report.

[m] We have assumed that one existing PCWP facility uses the emissions averaging compliance option. New PCWP facilities are not allowed to use emissions averaging.

[n] We have assumed that it will take each new PCWP respondent 40 hours to develop a record system for recording parameter monitoring information. [(2 new mills + 5 new process lines) / 3 = 2]

[o] We have assumed that it will take each new PCWP respondent 80 hours to draft the startup, shutdown, malfunction plan, and another 20 hours to review/revisions, for a

total of 100 hours.

[p] Records of continuous compliance includes, records of CMS data for emission limitations and various records for work practice standards. There are 113 existing PCWP and 2 new PCWP facilities during the three-year period of this ICR [(113 (yr 1)+ 113 (yr 2) + 115 (yr 3))/3 = 114 (rounded)].

[q] 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.

[r] We have assumed that it will take 40 hours for each new personnel to be trained. [(2 new mills + 5 new process lines) / 3 = 2]

[s] We have assumed that it will take 16 hours for personnel to complete refresher training and that 20 percent of the existing PCWP facilities will participate [114 x 0.2 = 23].

[t] 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)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) EPA Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year [a]	(E) Technical Hours Per Year (E=CXD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Costs, $ [b]
1. Attend performance test [c]	24	1	24	2	48	2.4	4.8	$2,624.33
2. Report review								
A. Notification of construction/reconstruction [d]	2	1	2	15	30	1.5	3	$1,640.21
B. Notification of anticipated startup [d]	2	1	2	15	30	1.5	3	$1,640.21
C. Notification of actual startup [d]	2	1	2	15	30	1.5	3	$1,640.21
D. Notification of applicability of standard (initial notification) [d]	2	1	2	15	30	1.5	3	$1,640.21
E. Review of emissions averaging plan [e]	40	1	40	0	0	0	0	$0
F. Review of request for routine control system maintenance exemption [f]	2	1	2	2	4	0.2	0.4	$218.69
G. Notification of performance test [g]	1	1	1	2	2	0.1	0.2	$109.35
H. Notification of compliance status								
1) With performance test [h]	8	1	8	2	16	0.8	1.6	$874.78
2) Without performance test [i]	4	1	4	0	0	0	0	$0
I. Review of initial compliance report [j]								
1) No deviations [k]	2	1	2	2	4	0.2	0.4	$218.69
2) Deviations [k]	8	1	8	0	0	0	0	$0
3) Startup, shutdown, malfunction	2	1	2	0	0	0	0	$0

report [l]								
4) Control system maintenance report [m]	2	1	2	0	0	0	0	$0
5) Emissions averaging report [e]	8	1	8	0	0	0	0	$0
J. Review of semiannual compliance report								
1) No deviations [k]	2	2	4	102	406.8	20.34	40.68	$22,241.18
2) Deviations [k]	8	2	16	11	180.8	9.04	18.08	$9,884.97
3) Startup, shutdown, malfunction report [l]	2	2	4	11	45.2	2.26	4.52	$2,471.24
4) Control system maintenance report [m]	2	2	4	11	45.2	2.26	4.52	$2,471.24
5) Emissions averaging report [e]	8	2	16	1	16	0.8	1.6	$875
TOTAL ANNUAL BURDEN AND COST(rounded) [n]					**1,020**			**$48,600**

Assumptions:

[a] The average number of respondents that will be subject to this rule over the next 3 years of this ICR is 244, including 243 existing respondents in years 1-3, plus 2 new respondents projected to become subject to the rule in year 3 for and average of 244 = [243 (yr 1)+ 243 (yr 2) + 245 (yr 3)]/3. There are 113 existing PCWP facilities and 130 existing lumber mills subject to the PCWP NESHAP. During the three-year period of this ICR, an average of 1 new PCWP facility will become subject each year (2/3=1 (rounded)). Therefore, there will be an average of 114 PCWP facilities (113 existing + 1 new = 114). Although subject to the rule, lumber mills are only required to submit an initial notification.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $65.71 Managerial rate (GS-13, Step 5, $41.07 x 1.6), $48.75 Technical rate (GS-12, Step 1, $30.47 x 1.6), and $26.38 Clerical rate (GS-6, Step 3, $16.49 x 1.6). These rates are from the Office of Personnel Management (OPM) 2018 General Schedule which excludes locality rates of pay.

[c] We estimate that it will take EPA personnel 24 hours to attend performance tests at new facilities (2 new PCWP mills, 5 new PCWP process lines) required to test during the three-year period of this ICR (7 facilities/3 years = 2).

[d] One-time activity for new sources projected to commence construction over the 3-year ICR period, including 2 new PCWP mills, 5 new PCWP process lines, and 39 new lumber kilns at existing sawmills, for an average of 15 affected sources per year. [(2 + 5 + 39) /3 = 15]

[e] We have assumed that one existing PCWP facility uses the emission averaging plan. New facilities are not allowed to use emissions averaging.

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

[g] We have assumed that it will take one hour to review the notification of initial performance test.

[h] 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).

[i] 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).

[j] 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.

[k] We have assumed that 90 percent of facilities (113 existing PCWP facilities x 0.9 = 102) will have no deviations, and 10 percent (113 x 0.1 = 11) will have deviations

[l] We have assumed the 10 percent of sources with deviations will report any action taken during a startup, shutdown, or malfunction that are consistent with the SSMP.

[m] We have assumed the 10 percent of sources with deviations will prepare a control system maintenance report.

[n] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.