

Table 1: Annual Respondent Burden and Cost – Kraft Pulp Mill Affected Sources for Which Const Commenced After May 23, 2013 (40 CFR Part 60, Subpart BBa) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person- hours per year (E=CxD)
1. Applications	N/A				
2. Survey and studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements ^c	30	1	30	14	420
B. Required activities					
Initial performance tests ^d	80	1	80	2	160
5-year repeat performance tests ^{d, e}	80	1	80	2	160
Repeated performance tests due to failure ^{d, f}	80	0.2	16	0.8	13
C. Gather existing information	See 3B				
D. Write report					
Notification of construction/reconstruction	2	1	2	2	4
Notification of performance test ^f	2	1.2	2.4	4.8	12
Notification of actual startup	2	1	2	2	4
Notification of CMS demonstration	2	1	2	2	4
Notification of physical or operational changes	2	1	2	2	4
Notification of opacity observations	2	1	2	2	4
Report of performance test (including submittal through EPA's ERT) ^{f, g}	4	1.2	4.8	4.8	23
Semiannual report ^{h, i}	8	2	16	14	224
Excess emissions/monitoring systems report ^{i, j}	20	2	40	14	560
Malfunction report (affirmative defense) ^k	30	2	60	0	0
Subtotal for Reporting Requirements					
4. Recordkeeping requirements					
A. Read instructions	See 3A				
B. Plan activities	See 3B				
C. Implement activities	See 3B				
D. Develop record system ^l	40	1	40	2	80
E. Time to enter and transmit information					
Records of monitoring data ^m	0.5	365	182.5	14	2,555
Records of malfunctions	2	12	24	14	336
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ⁿ					

TOTAL CAPITAL AND O&M COST (rounded) ^a					
GRAND TOTAL (rounded) ^a					

Assumptions:

- ^a We assume an average of 12 existing mills per year will be subject to the rule and that an average of 2 existing mills (that we per year will replace aging emission units with new emission units subject to Subpart BBa.
- ^b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$58 States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry g compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed
- ^c We assume that each respondent will have to familiarize with the regulatory requirements each year.
- ^d We assume it will take 80 hours for each respondent to coordinate the performance tests for PM, CPM, opacity and TRS. Te and O&M costs.
- ^e Repeat performance tests are required in 5-year intervals. We assume 2 respondents per year will be required to conduct repe
- ^f We assume that 20 percent of respondents would repeat a performance test due to failure.
- ^g Hard copy report of performance test is included in 3B. Submittal of performance test data through EPA's ERT is estimated t
- ^h Assumes that it will take each respondent 8 hours to complete the semiannual report.
- ⁱ Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods.
- ^j We assume each respondent will take 20 hours two times per year to review monitoring data (e.g., to document compliance v report.
- ^k Not applicable.
- ^l Includes time to adjust existing data acquisition systems at modified sources to include startup and shutdown periods and con time activity.
- ^m We assume that it will take each respondent 30 minutes per day to document monitoring data (e.g., operating parameters, op evaluations, and startup/shutdown).
- ⁿ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

uction, Reconstruction, or Modification

(F)	(G)	(H)
Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total cost per year ^b
21	42	\$55,939.80
8	16	\$21,310.40
8	16	\$21,310.40
0.6	1.3	\$1,704.83
0.2	0.4	\$532.76
0.6	1.2	\$1,534.35
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0.2	0.4	\$532.76
0.2	0.4	\$532.76
1.2	2.3	\$3,068.70
11	22	\$29,834.56
28	56	\$74,586.40
0	0	\$0
1,830		\$211,953
4	8	\$10,655.20
128	256	\$340,300.45
17	34	\$44,751.84
3,417		\$395,707
5,250		\$608,000

Labor Rates	
Management	\$141.06
Technical	\$120.27
Clerical	\$58.67

69 hrs/response

		\$976,000
		\$1,580,000

are previously subject to 40 CFR Part 60, Subpart BB)

3.67 for clerical labor. These rates are from the United
group.” The rates are from column 1, “Total
by private industry.

isting contractor costs are included in the capital/startup

at performance tests.

o require 4 hours per test.

with allowances) and complete the excess emissions

nply with revised monitoring allowances; this is a one-

acity and TRS monitoring data, CMS performance

Table 2: Average Annual EPA Burden and Cost – Kraft Pulp Mill Affected Sources for Modification Commenced After May 23, 2013 (40 CFR Part 60, Subpart BBa) (Renewal)

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=A×B)	Plants per year ^a
1. Attend initial performance test ^c	24	1	24	2
2. Attend 5-year repeat performance test ^{c, d}	24	1	24	2
3. Attend repeat performance test due to failure ^{c, e}	24	0.2	4.8	0.8
4. Report review				
Review notification of construction/reconstruction	2	1	2	2
Review notification of performance test ^e	0.5	1.2	0.6	4.8
Review notification of actual startup	0.5	1	0.5	2
Review notification of CMS demonstration	0.5	1	0.5	2
Review notification of physical/operational changes	0.5	1	0.5	2
Review notification of opacity observations	0.5	1	0.5	2
Review performance test reports ^e	8	1.2	9.6	4.8
Review semiannual report ^{f, g}	4	2	8	14
Review excess emissions/monitoring systems report ^{f, g}	8	2	16	14
TOTAL (rounded)^h				

Assumptions:

^a We assume an average of 12 existing mills per year will be subject to the rule and that an average of 2 existing mills per year will replace aging emission units with new emission units subject to Subpart BBa.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent for employees.

^c We assume that it will take EPA personnel 24 hours to attend each performance test.

^d Repeat performance tests are required in 5-year intervals. We assume 2 respondents per year will be required.

^e We assume that 20 percent of respondents would repeat a performance test due to failure.

^f We assume that it will take EPA personnel 4 hours to review each semiannual report and 8 hours to review an excess emissions report.

^g Ongoing activities are based on the average number of respondents per year over the 3-year ICR periods.

^h Totals have been rounded to 3 significant figures.

**r Which Construction, Reconstruction, or
al)**

(E)	(F)	(G)	(H)
Technical person- hours per year (E=C×D)	Management person-hours per year (F=E×0.05)	Clerical person-hours per year (G=E×0.1)	Cost ^b
48	2.4	4.8	\$2,661.41
48	2.4	4.8	\$2,661.41
3.84	0.192	0.384	\$212.91
4	0.2	0.4	\$221.78
2.88	0.144	0.288	\$159.68
1	0.05	0.1	\$55.45
1	0.05	0.1	\$55.45
1	0.05	0.1	\$55.45
1	0.05	0.1	\$55.45
46	2.3	4.6	\$2,554.95
112	5.6	11	\$6,209.95
224	11	22	\$12,419.90
567			\$27,300

Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

ng mills (that were previously subject to 40 CFR Part 60, Subpart

l labor. These rates are from the Office of Personnel Management
cent to account for the benefit packages available to government

l to conduct repeat performance tests.

ach excess emissions report and malfunction report.

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	2	1	0	2
Notification of performance test ^a	4	1.2	0	4.8
Notification of actual startup	2	1	0	2
Notification of CMS demonstration	2	1	0	2
Notification of physical or operational changes	2	1	0	2
Notification of opacity observations	2	1	0	2
Report of performance test (including submittal through EPA's ERT) ^a	4	1.2	0	4.8
Semiannual report	14	2	0	28
Excess emissions/monitoring systems report	14	2	0	28
			Total	76

^a We assume that there are 2 new respondents each year and that 2 existing respondents will have to complete the 5-year repeat performance tests for a total of 4 respondents subject to performance testing per year. We also assume that 20% of respondents will have to repeat a performance test due to failure.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	2	10	0	0
2	2	12	0	0
3	2	14	0	0
Average	2	12	0	0

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

Capital/Startup vs. Operation and Maintenance (O&M) Cos				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/ Startup Cost for One Respondent	Number of New Respondents	Total Capital/ Startup Cost (B X C)	Annual O&M Costs for One Respondent
Opacity monitor	\$40,000	2	\$80,000	\$8,600
TRS monitor	\$108,000	2	\$216,000	\$23,000

ESP voltage and current monitors	\$31,000	2	\$62,000	\$4,200
Scrubber pressure drop monitor ^a	\$350	2	\$700	\$70
Scrubber liquid flow rate monitor ^a	\$15,500	2	\$31,000	\$3,100
Performance tests:				
Initial Method 9 for opacity	\$1,000	2	\$2,000	
Initial Method 5 and 202 for PM and condensable PM (CPM)	\$6,800	2	\$13,600	
Initial Method 16, 16A, 16B or 16C for TRS	\$3,000	2	\$6,000	
Repeat Method 5 and 202 for PM and CPM (every 5 years) ^b	N/A			\$6,800
Repeat Method 16, 16A, 16B or 16C for TRS (every 5 years) ^b	N/A			\$3,000
Total ^c			\$411,000	

^a Scrubber monitor O&M costs were estimated as 20 percent of the initial monitor cost.

^b Repeat tests are required in 5-year intervals. We assume that 2 respondents per year will be required to conduct

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

(E)
Number of Respondents (E=A+B+C-D)
12
14
16
14

ts	
(F)	(G)
Number of Respondents with O&M	Total O&M (E X F)
14	\$120,400
14	\$322,000

14	\$58,800
14	\$980
14	\$43,400
2	\$13,600
2	\$6,000
	\$565,000

act repeat performance tests.