

**INFORMATION COLLECTION REQUEST  
SUPPORTING STATEMENT**

**EPA ICR No. 2552.01**

**INFORMATION COLLECTION REQUEST FOR PLYWOOD AND COMPOSITE  
WOOD PRODUCTS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR  
POLLUTANTS (NESHAP) RESIDUAL RISK AND TECHNOLOGY REVIEW (RTR)**

Sector Policies and Programs Division  
U.S. Environmental Protection Agency  
Research Triangle Park, North Carolina 27711

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**SUPPORTING STATEMENT**  
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**Part A of the Supporting Statement**

**1. Identification of the Information Collection**

*(a) Title of the Information Collection*

“Information Collection Request for Plywood and Composite Wood Products National Emission Standards for Hazardous Air Pollutants (NESHAP) Residual Risk and Technology Review (RTR).” This is a new information collection request (ICR).

*(b) Short Characterization*

This information collection is being conducted by the U.S. Environmental Protection Agency (EPA)’s Office of Air and Radiation (OAR) to assist the EPA Administrator, as required by sections 112(d)(2)-(3), 112(d)(6), and 112(f)(2) of the Clean Air Act (CAA), as amended, to determine the current affected population of plywood and composite wood products (PCWP) processes and to reevaluate emission standards for the source category. The information from this ICR would also be made available to the public.

This is a one-time information collection. Currently, information necessary to identify PCWP facilities is available from the EPA’s Toxics Release Inventory (TRI) and from the EPA’s Emission Inventory System (EIS). Neither the TRI nor the EIS contain all of the details (capacity, fuel types, operating schedule, emission source design, materials processed, emissions collection and control systems, regulatory alternatives used, and emissions test data) necessary to characterize affected sources subject to the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (40 CFR part 63, subpart DDDD) (hereafter referred to as the PCWP NESHAP) for purposes of regulatory analyses. Although some of the needed information may be included in title V or state air emissions permits, many permits do not contain all of the detail needed and are not readily available from any single source. Furthermore, there are no readily available sources for results of previously conducted emissions tests (since the late 1990s) that will provide data for emissions of the variety of pollutants under consideration. To obtain this information, the EPA is soliciting information with a survey, under authority of CAA section 114, from all potentially affected facilities. The EPA

intends to administer the survey in electronic format, as indicated by the spreadsheet and instruction document in Attachment 1. The survey will be sent to all facilities that produce PCWP or kiln-dried lumber or are otherwise subject to the PCWP NESHAP and that are described as CAA major sources or synthetic area sources (that used technology to avoid major PCWP NESHAP source status) in the EPA's databases.

The EPA estimates the total cost to industry of the ICR (for the gathering, entering, and quality assurance (QA) of data submitted in response to the survey for 391 respondents) will be 59,265 hours and \$4,187,020, including \$6,549 in operating and maintenance (O&M) costs for digital media (CD, DVD, or flash drive) and postage for mailing survey responses to the EPA. The EPA estimates that the total cost of the ICR to PCWP facilities will be 46,588 hours and \$3,289,362, including \$3,116 in O&M costs, and that the total cost of the ICR to lumber mills with dry kilns will be 12,677 hours and \$897,658, including \$3,434 in O&M costs. The overall average burden and cost per respondent is estimated to be 152 hours and \$10,692 (250 hours and \$17,668 per respondent for PCWP facilities and 62 hours and \$4,362 per respondent for lumber mills with dry kilns).

## **2. Need for and Use of the Collection**

### *(a) Need/Authority for the Collection*

The PCWP production source category includes any CAA major source facility engaged in the production of PCWP and/or kiln-dried lumber. This category includes, but is not limited to, plywood, dry veneer, particleboard, medium density fiberboard (MDF), hardboard, fiberboard, oriented strand board (OSB), engineered wood products (EWP), and kiln-dried lumber. The PCWP production process units include operations such as conditioning, digesting, refining, fiber washing, drying, adhesive application, forming, pressing, cooling, sawing, sanding, wastewater treatment, and miscellaneous coating application. Different material preparation, drying, adhesive, pressing, and coating processes are used in the different industry segments. The federal emission standard that is the subject of this information collection is the PCWP NESHAP.

In general, the PCWP NESHAP covers hazardous air pollutant (HAP) emissions from the wood products production areas (*e.g.*, material preparation, drying, adhesive application, pressing) at PCWP facilities. The PCWP NESHAP includes several alternative emission limits for each covered process that are designed to provide flexibility and to promote and encourage

the use of new technology, particularly air pollution controls and pollution prevention technologies.

Section 112(f)(2) of the CAA directs the EPA to conduct risk assessments on each source category subject to maximum achievable control technology (MACT) standards and determine if additional standards are needed to reduce residual risks. The section 112(f)(2) residual risk review is to be done 8 years after promulgation. Section 112(d)(6) of the CAA requires the EPA to review and revise the MACT standards, as necessary, taking into account developments in practices, processes, and control technologies. The section 112(d)(6) technology review is to be done at least every 8 years. The PCWP NESHAP was promulgated in 2004 and is due for review under CAA sections 112(f)(2) and 112(d)(6).

As a result of PCWP air pollution control requirements, the EPA amended the 40 CFR part 429 effluent guidelines concurrent with the 2004 PCWP NESHAP. It was determined that facilities subject to zero discharge limits in the Timber Processing Industry section of the guidelines should be allowed an exception for discharges from pollution control equipment installed to comply with the PCWP NESHAP. The amendments allowed facilities to establish case-by-case guideline limits, and the EPA indicated at the time of PCWP NESHAP promulgation that additional information would be necessary for reviewing those limits subsequent to PCWP NESHAP compliance and to amend the effluent guidelines as necessary. The planned ICR will identify facilities that obtained case-by-case effluent limits associated with PCWP air pollution controls.

In addition to the CAA-required reviews, recent case law and legal petitions suggest the need to review the PCWP NESHAP. In June 2007, The U.S. Court of Appeals for the District of Columbia Circuit issued a remand order for the EPA to re-evaluate the MACT floors and standards for several PCWP process unit groups. Among the issues to be addressed are MACT floors and standards that had no emissions reduction requirements. Also, in December 2008, the U.S. Court of Appeals for the D.C. Circuit vacated the startup, shutdown, and malfunction (SSM) provisions contained in the NESHAP General Provisions that apply to PCWP facilities. To the extent that these legal actions need to be addressed in the PCWP NESHAP, the EPA intends to investigate potential rule revisions at the same time as the CAA statutory reviews are conducted.

Additionally, in 2008, the California Air Resources Board (CARB) finalized an Airborne Toxic Control Measure (ATCM) to reduce formaldehyde emissions from hardwood plywood, MDF, and particleboard. Consistent with the CARB ATCM, in 2008, Congress passed the Formaldehyde Standards for Composite Wood Products Act, as Title VI of Toxic Substances Control Act (TSCA), [15 U.S.C. 2697], and the EPA subsequently proposed a rule in 2013 to implement TSCA Title VI to reduce formaldehyde emissions from composite wood products.<sup>1</sup> The TSCA implementation rule (Formaldehyde Emission Standards for Composite Wood Products, RIN 2070-AJ44) was finalized by the EPA on December 12, 2016, (81 FR 89674). The CARB ATCM and the rule to implement TSCA Title VI emphasize the use of low emission adhesives, including ultra-low-emitting formaldehyde (ULEF) and no added formaldehyde (NAF) resin systems, and many composite wood products facilities have changed resin systems over the past 7 years following promulgation of the PCWP NESHAP. The planned ICR would provide the EPA with information on the recent advances in resin system technology and allow the EPA to determine the effects of these changes on HAP emissions from composite wood product manufacturing facilities.

The data used as the basis for the originally promulgated PCWP NESHAP are over 15 years old. The EPA is aware that significant changes have been made in the intervening years in the number of affected facilities, in industry ownership practices, types of resins used, and in emissions collection and control configurations. Further, in light of the statutory requirements for reviewing emission standards under CAA section 112 and the recent case law interpreting those requirements, the EPA has concluded that obtaining updated information will be crucial to informing its decisions on the RTR for the manufacturing sources covered by the PCWP NESHAP.

Compliance and engineering test data collected through this ICR are expected to provide most of the emissions data for the sources regulated by the PCWP NESHAP. Additionally, the ICR is expected to provide emissions test data, emissions estimates, information on work practices and equipment design criteria for the process units remanded for regulation by the U.S.

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<sup>1</sup> Emissions of concern under the CARB ATCM and TSCA Title VI are indoor air emissions of formaldehyde emanating from composite wood products sold in the U.S. The emissions of concern under the PCWP NESHAP are for multiple HAP (including, but not limited to, formaldehyde) from process units at PCWP manufacturing facilities. Implementation of the CARB and TSCA rules affects PCWP manufacturing because many composite wood products manufacturers have changed their resin systems to reduce the amount of formaldehyde in their products (thus also altering the emissions profile from the manufacturing of these products).

Court of Appeals in 2007. Since the remand was issued, environmental research conducted by the wood products industry has included some effort to evaluate the suitability of remanded process units for emissions testing and to develop emission factors. The ICR will inform the EPA about the availability of emissions test data, use of work practices that reduce emissions, and application of any new emission factors. The emissions data collected by the ICR may also have benefits to other EPA programs valued by the public. The RTR ICR data can be used for QA of information in the EPA's National Air Toxics Assessment (NATA) program as well the National Emissions Inventory (NEI), which is built using the EIS first to collect the data from state, local, and tribal air agencies and then to blend that data with other data sources. The RTR ICR data collected in the survey may be helpful in updating the data sets for facilities with no data or inaccurate data in current databases. Preliminary risk analysis results for this industry sector (based on the current NATA data sets) indicate that some facilities may present risk above the thresholds for further consideration under the residual risk process. Additional facility-specific information would allow the EPA to better characterize emissions sources, refine the risk analysis, and to address any unacceptable residual risk that remains. Information collected directly from PCWP facilities will have the greatest practical utility for purposes of performing the RTR regulatory analyses, as information from the affected industry will contain the most up-to-date, accurate, and reliable equipment and operational data for each facility. The ICR will request that new information be supplied for a 2016 base year, and, therefore, will not suffer from the considerable "lag time" that can be associated with different inventory and permit review cycles (*e.g.*, where the currently available inventory does not yet reflect recent changes in equipment).<sup>2</sup>

CAA section 114(a) states that the Administrator may require any owner or operator subject to any requirement of the 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

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<sup>2</sup>There is a "lag time" associated with compiling large state or national emission inventories. For example, an updated version of the NEI database is compiled every 3 years, but the information contained in the NEI may be based on prior years if states do not submit current data. There can also be a "lag time" associated with posting of recent permits to state websites (particularly if permits are only posted every 5 years as they are reviewed).

monitoring of emissions is impractical; (F) submit compliance certifications in accordance with section 114(a)(3); and (G) provide other information as the Administrator may reasonably require.

(b) *Use/Users of the Data*

As mentioned above, the data used for the originally promulgated NESHAP are outdated and do not reflect the significant changes in emissions collection and control configurations that have occurred since promulgation of the NESHAP. The NESHAP contain a number of compliance alternatives to allow for a variety of equipment configurations and process changes to be used in meeting the emission standards. The EPA is also required to address the 2007 D.C. Circuit Court remand order for the EPA to re-evaluate MACT floors and standards for several “remanded” PCWP process unit groups. The PCWP NESHAP required changes to effluent limitations under the Clean Water Act. Additionally, the CARB ATCM and the EPA’s TSCA implementation rule limit formaldehyde indoor-air emissions from composite wood products and have resulted in a shift to low emission adhesives, including ULEF and NAF resin systems at hardwood plywood, MDF, and particleboard products.

At present, the EPA does not have a database reflecting the post-NESHAP and post-CARB (or TSCA implementation rule) configurations of PCWP resin systems, emissions sources, and air pollution control systems. It is essential for the EPA to have updated information to use in the regulatory analyses required under CAA sections 112(d)(2)-(3), 112(d)(6) and 112(f)(2). The data would also support consideration of work practices under CAA section 112(h) to satisfy requirements under CAA sections 112(d)(2)-(3). The EPA also needs information to develop standards for the remanded process unit groups, and to address the D.C. Circuit Court’s vacatur of SSM provisions. The EPA can make use of a single collection of information that would allow the Agency to consider control strategies that are the most effective for both HAP and effluent from pollution control devices installed for compliance with the NESHAP, and evaluate standards (*e.g.*, for the remanded emissions sources) that are consistent with the advances in technology implemented to comply with the CARB ATCM and TSCA implementation rule. The data would also allow the EPA to evaluate compliance options for startup and shutdown periods and to consider ways to consolidate monitoring, reporting, and recordkeeping requirements for facilities subject to multiple requirements.

The data collected will be used to update facility information and equipment configuration, develop new estimates of the population of affected units, and identify the control

measures and alternative emission limits being used for compliance with the existing rules that are under review. This information, along with existing permitted emission limits will be used to establish a baseline for purposes of the regulatory reviews. The emissions test data (test reports and continuous emission monitoring system (CEMS) data) collected will be used to verify the performance of existing control measures, examine variability in emissions, evaluate emission limits, and to determine the performance of superior control measures considered for purposes of reducing residual risk. Emissions test data will also be used to formulate options for MACT limits for the remanded PCWP process units that are feasible to test. Emissions data will also be used along with process unit details to consider subcategories for further regulation and to estimate the environmental and cost impacts associated with any regulatory options considered.

In addition to informing the CAA-required RTR regulatory analyses for the PCWP category, it is the EPA's intent that the updates supplied through this information collection will be available for the affected industry and for state, local, and tribal agencies to be used in future versions of the NEI, which is developed and updated through the EIS. The NEI is used by the EPA, states, and the public for a variety of purposes, including tracking of national trends in emissions of criteria pollutants and HAP. More information on the NEI and EIS can be found at <https://www.epa.gov/air-emissions-inventories/national-emissions-inventory> and <https://www.epa.gov/air-emissions-inventories/emission-inventory-system-eis-gateway>, respectively.

The non-confidential information collected with this ICR would also be available to the public, including industry trade groups that may find the information useful for their ongoing data gathering, analyses, and publications. In addition, such trade groups may wish to use the data collected to review and verify the EPA's regulatory conclusions.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

#### *(a) Non-duplication*

The Agency recognizes that a fraction of the information requested in the information collection effort may already be included in the submittals made by individual companies, pursuant to state and national emissions inventories, operating permits applications, initial notification forms, and compliance reports. However, the complete extent of the data requested under this survey is not available in any consistent or usable format. Additionally, these sources of information do not provide detailed emissions test data. As mentioned above, there is a lag



time associated with state and national emissions inventories, and permit review cycles. There is also a lag time associated with obtaining emissions test reports from state agencies (*i.e.*, agencies may be reluctant to release emissions test results they have not yet processed). The EPA's proposed information collection seeks up-to-date equipment configuration and operational data for the 2016 operating year and thus avoids the effects of any such lag time on data availability. Although some state permits are provided to the public as searchable portable document format (pdf) files, some states do not provide electronic versions of their issued title V permits. Even when the permit is available, the unit-specific operating data are often not contained within the permit. Some of the initial notifications and compliance reports submitted are available in hard copy only, where only the facility-level information (facility name, location, contact) is available in an electronic format. In order to address SSM issues when reviewing another rule, the EPA obtained semi-annual compliance reports and found the reports to contain a widely varying level of detail. Such variation in the level of detail of permits and compliance reports means that it would be extremely time-consuming for the EPA to extract the level of process detail needed for regulatory analyses from existing documents (assuming that these documents were readily available to the EPA), and that significant data gaps would remain even after data from existing documents were compiled.

Emissions test reports are also often retained as hard copies by state agencies and thus are not readily available for all facilities. Although one industry trade organization (National Council for Air and Stream Improvement [NCASI]) collects and compiles emissions test data in technical bulletins, these bulletins alone (while quite informative and valuable) do not inform all of the EPA's emissions data analyses because: (1) the NCASI technical bulletins are coded to mask facility identities, such that the emissions data cannot be reconciled with other emissions data available to the EPA; (2) the data contained in the NCASI reports may not be reported in the units of measure needed for analysis of emission limits; (3) much of the data pre-dates implementation of the NESHAP, and (4) the data are generally representative of NCASI member facilities, whereas information collected by the EPA would be requested from the entire population of affected facilities. Emissions test data collected by NCASI before development of the PCWP NESHAP were combined with emissions test reports collected by the EPA before development of the PCWP NESHAP and used to update the EPA's AP-42 emission factor documentation for the PCWP industry. While these emission factors are useful for purposes of

developing emissions estimates, they do not reflect changes to the industry that have occurred over the past decade (*i.e.*, implementation of the PCWP NESHAP and the CARB ATCM/TSCA Title VI Amendments).

To summarize, the information requested relevant to the current (post-PCWP NESHAP) equipment configuration and operation, resin systems in use, regulatory alternatives, emissions data, and effectiveness of various control systems at removing HAP is not readily available from other sources. In the absence of an industry data collection, the EPA would be forced to try to obtain permits, compliance reports, and emissions test reports from states; extract information from these reports (which vary in detail); and then to fill data gaps where information is not available from the reports obtained. This process of acquiring and extracting data from existing reports would require more time than an industry data collection, and ultimately would be expected to yield incomplete information. Further, the RTR for the PCWP NESHAP is court-ordered by the U.S. District Court of Washington D.C. to be completed no later than June 30, 2020.<sup>3</sup> Information collected directly from PCWP facilities would provide the timeliest and complete current data set with the greatest practical utility for purposes of performing the RTR regulatory analyses that are due to be completed under CAA sections 112(d)(6) and (f)(2). In addition to conducting the RTR, the data would allow the EPA to simultaneously address the remand to evaluate standards under CAA sections 112(d)(2)-(3) and consider CAA section 112(h) work practices for remanded units, as a matter of efficiency and to provide regulatory certainty for the affected industry. The data would allow the EPA to conduct its risk and technology reviews for all process units in the category, including the remanded units. Conducting a simultaneous RTR for both the regulated and the remanded sources would allow the EPA to avoid the burden of conducting a second RTR for the remanded sources in the future.

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

This ICR is being submitted to the Office of Management and Budget (OMB) as required by the Paperwork Reduction Act of 1995 (PRA) and the subsequent rule issued by the OMB on August 29, 1995 (60 FR 44978). The EPA previously submitted the draft ICR for public review, and the ICR being submitted to the OMB includes revisions to address the public comments received during that review period.

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<sup>3</sup> Blue Ridge Environmental Defense League, et. al., v. Pruitt., 16-cv-00364 (CRC), D.C. Cir. March 22, 2017.

(c) *Consultations*

The EPA has been in ongoing consultation with the affected industry regarding the scope of survey. In addition, as noted previously, the public was given an opportunity to provide detailed comments on the electronic survey, and the EPA has considered and addressed those comments.

(d) *Effects of Less Frequent Collection*

This ICR will require the owner/operator of each major source and each synthetic area source PCWP facility being surveyed to complete an electronic update of their 2016 facility and emissions data to be used for RTR purposes. All facilities will be asked to complete an electronic survey of general facility information (production processes and capacities), equipment details (for material preparation, drying, adhesive, and pressing), permit limits, emissions control measures, and emissions test data (for previously conducted tests only). The EPA expects the information requested in this survey to be a one-time effort. These surveys are infrequent; the last similar survey was conducted in 2000, prior to rule proposal.

(e) *General Guidelines*

This ICR will adhere to the guidelines for Federal data requestors, as provided at 5 CFR 1320.6.

(f) *Confidentiality*

Respondents will be required to respond under the authority of CAA section 114. If a respondent believes that disclosure of certain information requested would compromise a trade secret, it should be clearly identified as such and will be treated as confidential until and unless it is determined in accordance with established EPA procedure as set forth in 40 CFR Part 2 not to be entitled to confidential treatment. All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B—Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979, 50 FR 51661, Dec. 18, 1985, 58 FR 461, Jan. 5, 1993, 76 FR 30817, May 26, 2011; 76 FR 64015, Oct. 17, 2011). Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by the EPA, it may

be made available to the public without further notice (40 CFR 2.203, September 1, 1976). Because CAA section 114(c) exempts emission data from claims of confidentiality, the emission data provided may be made available to the public. Therefore, emissions data should not be marked confidential. A definition of what the EPA considers emissions data is provided in 40 CFR 2.301(a)(2)(i).

(g) *Sensitive questions*

This section is not applicable because this ICR will not involve matter of a sensitive nature.

#### **4. The Respondents and the Information Requested**

(a) *Respondents/NAICS Codes*

Respondents affected by this action are owners/operators of facilities that are “major sources” or “synthetic area sources” of HAP emissions<sup>4</sup> and produce plywood, particleboard, MDF, hardboard, fiberboard, OSB, EWP and/or operate lumber dry kilns. In the U.S., the EPA’s analysis indicates that there may be a total of 391 respondent facilities out of over 1000 listed in the EPA’s databases (*e.g.*, EIS/NEI, Enforcement Compliance History Online [ECHO] and other Office of Enforcement and Compliance Assurance [OECA] databases) from the regulated North American Industry Classification System (NAICS) codes.<sup>5</sup> Only major sources and synthetic area sources which used technology to avoid major PCWP NESHAP source status will be included in the respondent group. Respondents (391 total) include operations in the following wood products industry segments:

- 205 lumber mills with dry kilns,
- 87 plywood and veneer facilities,
- 30 OSB facilities,

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<sup>4</sup> As defined in 40 CFR Part 63, subpart A,

“*Major source*” means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence.

A “synthetic area source” is a stationary source which is subject to federally-enforceable conditions that limit its potential to emit to below major source thresholds.

<sup>5</sup> Note that PCWP facilities have been identified to the best of the EPA’s ability for the purpose of this ICR action only. Identification of any unit for receipt of the CAA section 114 letter requiring that information be submitted or testing be conducted does not constitute a final Agency applicability determination related to the rule under development. Similarly, units not receiving a CAA section 114 letter may ultimately be determined to be subject to the final rule. Specific applicability definitions will be developed during the rulemaking process and will be subject to notice and comment.

- 16 MDF facilities,
- 15 particleboard facilities,
- 5 hardboard facilities,
- 4 fiberboard facilities,
- 15 EWP facilities,
- 1 OSB and MDF facility,
- 2 OSB and EWP facilities,
- 1 OSB and plywood/veneer facility,
- 2 particleboard and MDF facilities,
- 4 EWP and plywood/veneer facilities,
- 3 particleboard and plywood/veneer facilities, and
- 1 hardboard, particleboard, and plywood/veneer facility.

The estimate above is likely to be larger than the actual number of facilities that will be required to respond to this ICR. There are three reasons this estimate is likely to be high. First, while the EPA has attempted to remove “true area” sources, the EPA found that in many cases, a source’s status as a synthetic area for HAP emissions was not consistently noted across information sources, leaving some degree of uncertainty regarding source status. Second, the base year for one of the key EPA databases used to identify respondents was 2011. The EPA worked with select sources of more recent data as well as trade groups to refine the list to reflect current ownership and operating status, but it is likely that additional refinements are needed. Third, our experience with the Pulp and Paper Sector ICR in 2011 indicates preliminary lists generally overestimate actual respondents, sometimes substantially. The EPA initially identified 386 respondents subject to that ICR and ultimately only required 173 major sources to complete that survey.

The EPA anticipates requesting comments from stakeholders on the facility list before proceeding with the ICR to further refine and focus the list on major sources or synthetic area sources that have applied technology on PCWP processes. The NAICS codes for respondents affected by the information collection include 321113 for Sawmills, 321211 for Hardwood Plywood and Veneer, 321212 for Softwood Plywood and Veneer, 32121 for Engineered Wood Products, 321219 for Particleboard, MDF, OSB, Hardboard and Fiberboard.

*(b) Information Collected*

(i) *Data Items.* The ICR will require each owner/operator of each major source affected facility to complete an electronic survey that contains several components. Facilities that are synthetic area sources would only be required to complete a one-page form and provide

supporting documentation of their synthetic area source status. The required components of the survey for major sources vary based on the PCWP industry segment. The draft electronic survey is a Microsoft Excel spreadsheet file (*PCWP\_survey.xlsx*) that is divided into several worksheets or “tabs” within the spreadsheet. A separate spreadsheet is provided for collection of CEMS data (*PCWP\_CEMS.xlsx*). Table 1 of this document denotes which PCWP survey spreadsheet tabs are to be completed, depending on the type of facility. The *Mill*, *Prod*, *EquipDetail*, *ReleasePt*, *Permit*, and *HAP Emissions* tabs must be completed by all surveyed PCWP facilities and all lumber mills with dry kilns that are major sources of HAP emissions. Other tabs will be required on the installed process equipment, depending on either the business segment and/or the facility. Facilities will also be asked to supply supporting documentation, such as process flow diagrams and copies of operating permits.

**Table 1. Survey Spreadsheets and Tabs to Complete**

Spreadsheet tab (abbreviated tab name)	Types of facilities expected to complete this spreadsheet tab	Estimated number of facilities	Estimated number of lumber mills with dry kilns
<i>PCWP_survey.xlsx</i>			
Mill (general information) (Mill)	All facilities	186	205
Products (Prod)	All facilities	186	205
Equipment detail (EquipDetail)	All facilities	186	205
Release Point Detail (ReleasePt)	All facilities	186	205
Permit (Permit)	All facilities	186	205
Resin (Resin)	Plywood, OSB, MDF, Hardboard, Particleboard, EWP	171	
Tanks (Tank)	Plywood, OSB, MDF, Hardboard, Particleboard, EWP	171	
Veneer Dryer (VeneerDry)	Plywood, Veneer, laminated veneer lumber (LVL)	104	
Rotary Dryer (RotaryDry)	Particleboard, OSB	55	
Tube Dryer (TubeDry)	MDF, Hardboard	25	
Conveyor Dryer (ConvDry)	OSB facilities with conveyor dryers	2	
Fiberboard/Hardboard Equipment (FB_HB)	Hardboard, Fiberboard	10	
Lumber Kilns (LKiln)	Lumber	29	205

Spreadsheet tab (abbreviated tab name)	Types of facilities expected to complete this spreadsheet tab	Estimated number of facilities	Estimated number of lumber mills with dry kilns
Direct Fired Dryer Fuel (DFDryFuel)	PCWP facilities that use direct combustion gas to heat dryers, whether from a burner built into the dryer or from a separate combustion unit serving one or more dryers, and lumber mills with direct-fired kilns	93	100
Press (Press)	Plywood, OSB, MDF, Hardboard, Particleboard, EWP	156	
Board Coolers (BC)	Particleboard, MDF	38	
EWP Press (EWPPress)	EWP	21	
Other Equipment (OtherEquip)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP that operate digesters, refiners, dry blending and forming operations, finishing sanders, finishing saws, panel trim chippers, and log vats	186	
Control Devices (APCD)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP	186	0
SSM (SSM)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP	186	
Miscellaneous Coatings (MiscCoat)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP	186	
Wastewater (WW)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP	64	
Emissions Tests (EmTest)	Plywood, OSB, MDF, Hardboard, Fiberboard, Particleboard, EWP	186	10
HAP Emissions (HAP Emissions)	All facilities	186	205
Certification (Certification)	All facilities	186	205
<b>PCWP_CEMS.xlsx</b>			
CEMS (CEMS)	Facilities with controlled units monitored by CEMS	37	

Emissions data collected will allow the EPA to characterize the performance of equipment and controls, reevaluate emissions limits, and consider variability. Emissions data from previously conducted emissions tests, including copies of test reports and CEMS data, are being requested for affected sources and process units for which emissions limits may be reevaluated under RTR. The pollutants for which emissions data are requested include all HAP regulated under the PCWP NESHAP, any surrogate used to demonstrate compliance with the regulated HAP, volatile organic compounds, particulate matter (both filterable and condensable of any size fraction), the species of any HAP metals, and opacity. The *EmTest* tab of the

*PCWP\_survey.xlsx* spreadsheet requests a summary of the emissions test reports provided. The *PCWP\_CEMS.xlsx* spreadsheet contains CEMS worksheets for different pollutants and averaging periods (e.g., for 1-hour, 3-hour, or 24-hour average total hydrocarbon data).

The *APCD* tab of the *PCWP\_survey.xlsx* spreadsheet requests information related to the capital and O&M costs (if known) for HAP controls and parameter monitoring equipment. The EPA requires cost information in order to perform the CAA-required regulatory analyses.

Although a large amount of information is needed for regulatory review of the NESHAP, the EPA has designed the PCWP information collection in a way to minimize the burden associated with supplying and processing this information. The survey will collect information to supply multiple regulatory actions in order to minimize the burden associated with multiple collections. The PCWP information collection is being administered in spreadsheet form (as opposed to database software) because respondents are likely to be more familiar with spreadsheet use than with databases. A table containing only the relevant and current source classification codes (SCC) will be provided to ensure that valid codes are used and to reduce respondent time associated with locating codes on the NEI website. Following QA of the data, the data from the Excel spreadsheet rows can be readily imported into Access database software for use by the Agency (eliminating the time required for the EPA to key-enter data). The PCWP survey spreadsheets and instructions will be provided to facilities on a website where they can be downloaded. Respondents will save and submit their completed survey spreadsheets and other materials requested, such as electronic copies of production flow diagrams, operating permits, and emissions test reports on digital media such as a CD, DVD, or flash drive.<sup>6</sup> The burden associated with collection of emissions test data has been reduced in several ways:

- (1) Only existing emissions data (CEMS data or emissions test reports) are being requested. Facilities are not required to conduct any new emissions testing for the ICR.
- (2) Facilities are not required to install or operate any new CEMS to respond to this survey.
- (3) The EPA has developed a matrix of process units and pollutants for which previous emissions test data are requested. Previous emissions data are only being requested for process unit and pollutant combinations for which emissions limits may be

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<sup>6</sup> Respondents may choose to mail ICR submittals to the EPA on digital media for two primary reasons: (1) to eliminate the potential for any issues with electronic transmittal of confidential information; and (2) the file size of the documents submitted can be difficult to transmit electronically. The EPA intends to provide an electronic file upload approach through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) for respondents who would prefer this approach for their non-confidential responses.



reevaluated under RTR (or for pollutants that may serve as an indicator or surrogate for process unit or control system performance). The matrix provides a 2004 or 2012 cutoff date for selected process unit and pollutant combinations (or in some cases, only requests the most recent five tests) in order to minimize respondent burden and to ensure the EPA's ability to process the data requested.

- (4) Rather than entering run-by-run entries of previous test data within the ICR, respondents are simply required to enter summary data and submit copies of emissions test reports in searchable electronic format. The EPA (or the EPA's contractor) personnel familiar with extracting test data from test reports will enter the run-by-run HAP data in a manner that ensures consistent and reliable treatment of the data (*e.g.*, with respect to data averaging, non-detects).

The burden for synthetic area sources has been reduced by allowing these facilities to complete a single-page response as opposed to the survey spreadsheets. In addition, the EPA has reduced the burden for major sources by building provisional HAP emissions calculations into the spreadsheet for optional use by facilities that do not have site-specific data for certain combinations of processes and pollutants.

Finally, the EPA has minimized the collection of control measure cost information by focusing the collection of cost information on air pollution controls and process changes of particular interest for the RTR (*i.e.*, HAP control measures as opposed to all control measures employed by PCWP facilities). The EPA expects cost information obtained from the industry to be some of the most reliable and valid information available since the cost data would be specific to PCWP applications. In addition, collection of cost information from the industry (as opposed to a separate collection from other sources such as vendors) would accelerate the EPA's ability to analyze the cost impacts of regulatory options.

(ii) *Respondent Activities.* The activities a respondent must undertake to fulfill the requirements of the information collection are presented in Attachment 2. These include: (i) read instructions; (ii) provide information on each affected source through electronic survey; and (iii) submit electronic copies of flow diagrams, a release point map, previous emissions test reports, compliance reports, operating permits, emissions averaging plans, copies of wastewater discharge permits, lumber dry kiln schedules, and data supporting emissions estimates for wastewater operations, as applicable.

## **5. The Information Collected – Agency Activities, Collection Methodology, and Information Management**

### *(a) Agency Activities*

A list of activities required of the EPA is provided in Attachment 3. These include:

(i) develop an electronic questionnaire and the packages for mail out; (ii) to answer respondent questions (including any claims of true area source status or claims that the facility is not engaged in processes of interest); (iii) review and analyze responses and emissions data; and (iv) analyze requests for confidentiality.

### *(b) Collection Methodology and Management*

In collecting and analyzing the information associated with this ICR, the EPA will use personal computers, applicable spreadsheets, and database software. To better facilitate uniformity in the format of the requested data, and, thus, increase the ease of database entry, standardized survey questions, example responses, and Excel spreadsheet forms will be distributed to respondents. The Excel spreadsheet forms used to collect information have been programmed with drop-down menus and to pre-populate certain process unit identification fields to reduce common respondent transcription errors that can impede database functionality. The EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal. Flow diagrams may be used to answer any questions revealed during QA of each submittal. The EPA may place follow-up calls to facilities should questions remain after reviewing all materials submitted. Following QA of each submittal, the spreadsheet information from each facility will be uploaded into an Access database for further analysis. Survey responses claimed as confidential will be housed in a separate database from the non-confidential survey responses and will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B—Confidentiality of Business Information. Run-by-run HAP data from previous emissions test reports will be entered into a database by the EPA (or the EPA's contractor personnel) familiar with extracting test data from test reports. In addition, CEMS data will be uploaded in a database for analysis of emissions variability. The resulting databases will be checked for QA prior to and as part of regulatory analyses.

### *(c) Small Entity Flexibility*

All respondents required to comply with the PCWP data gathering effort will be subject to the same requirements. The EPA expects respondents to the PCWP data-gathering effort will

include small entities. The ICR does not explicitly provide different instructions for small entities, but the EPA expects that small entities are likely to be lumber mills or lower-capacity PCWP facilities that will not be required to complete every tab of the survey. Facilities that are not major or synthetic area sources of HAP emissions (*i.e.*, true area sources) will not be required to complete the survey, provided that they submit documentation of their true area source status. Facilities that are synthetic area sources of HAP emissions that are not subject to the PCWP rule will only be required to complete a one-page form and the documentation requested on that form, and they would not be required to complete any other sections of the survey. The EPA expects that small entities that are major sources of HAP emissions, particularly lumber mills, will have less extensive operations than large entities, so fewer portions of the survey will apply to those facilities. The average hour burden for lumber mills is estimated to be one-fourth of the burden for PCWP facilities. The Agency also plans to use an electronic format of the questionnaire in order to reduce the burden and improve the data accuracy from all respondents, including small entities. Finally, the survey will contain a question to determine the small entity status of a facility. This question will help to identify, quantify, and minimize the burden on small entities during the revised rulemaking process.

*(d) Collection Schedule*

The EPA anticipates issuing the CAA section 114 letters for the information collection in the summer of 2017. These CAA section 114 letters would require the owner/operator of each PCWP facility to complete the survey spreadsheet and submit emissions test data within 120 days of receipt of the survey. The EPA will compile and analyze survey response data upon receipt.

## **6. Estimating the Burden and Cost of the Collection**

*(a) Estimating Respondent Burden*

The data collection activities a respondent must undertake to fulfill the requirements of the information collection are presented in Attachment 2. Data collection activities include: (i) read instructions; (ii) provide information on each affected source through electronic survey; and (iii) submit electronic copies of flow diagrams, a release point map, previous emissions test reports, compliance reports, operating permits, emissions averaging plans, copies of wastewater discharge permits, lumber dry kiln schedules, and data supporting emissions estimates for wastewater operations, as applicable.

(b) *Estimating Respondent Costs*

Attachment 2 also presents estimated costs for the required data collection activities. The basis for the (i) labor cost estimate and (ii) capital and operations (overhead) cost estimates follow. Labor rates and associated costs are based on data from the U.S. Bureau of Labor Statistics (BLS).

(i) *Estimating Labor Costs.* Technical, management, and clerical average hourly rates for private industry workers were estimated based on the BLS *May 2016 National Industry-Specific Occupational Employment and Wage Estimates* for NAICS code 321000—Wood Product Manufacturing, available at [https://www.bls.gov/oes/current/naics3\\_321000.htm](https://www.bls.gov/oes/current/naics3_321000.htm). Mean hourly wages for occupational groups are used as the basis for the labor rates: \$34.38 per hour for technical/professional, \$50.55 per hour for managerial, and \$17.21 per hour for clerical. These base labor rates were adjusted by 110 percent to account for fringe benefits and overhead. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.20, management at \$106.16, and clerical at \$36.14. These estimates represent the one-time burden that will be incurred by the recipients.

(ii) *Estimating Operating and Maintenance (O&M) Costs.* Costs for mailing survey responses to the EPA including digital media (CD, DVD, or flash drive) and postage are estimated at \$6,549. The O&M cost would be lower for facilities opting to upload their non-confidential responses online to the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

(iii) *Estimating Capital/Start-up Costs.* We do not anticipate any capital costs.

(iv) *Annualizing Capital Costs.* We do not anticipate any capital costs, so there are no annualized capital costs.

(c) *Estimating Agency Burden and Costs*

The costs the federal government would incur are presented in Attachment 3. The Agency labor rates are from the Office of Personnel Management (OPM) 2017 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2017-GS, available on the OPM website at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2017/general-schedule/>. The government employee labor rates are \$16.94 per hour for clerical (GS-7, Step 1), \$35.74 for technical (GS-13, Step 1), and \$49.68 for managerial (GS-15, Step 1). These rates were increased by 60 percent to include fringe benefits and overhead. The

fully-burdened wage rates used to represent Agency labor costs are: clerical at \$27.10, technical at \$57.18, and managerial at \$79.49.

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

Estimates based on several of the EPA's databases (*e.g.*, EIS/NEI, ECHO and other OECA databases) and other industry references indicate that the potential respondent universe consists of 391 facilities. All 391 of these facilities will be required to complete some portion of the electronic survey, with the exception of facilities that provide documentation to the EPA showing that either: (i) they are not a major or synthetic area source of HAP emissions, (ii) they were not operational in 2016 and remain closed, or (iii) they do not produce PCWP products.

The government burden estimate provided in Attachment 3 assumes that 15 percent of facilities will provide documentation of true area source status, facility closure, or that PCWP operations are not performed at the facility. However, it is not known how many of these claims will be valid, so all facilities are included in the burden estimate for respondents (in Attachment 2). Attachment 2 lists the various portions of the survey in detail and provides an estimated number of facilities required to complete each portion of the survey. Specific counts of the different types of facilities used in the burden estimates are provided in Section 4(a) of this supporting statement.

*(e) Bottom Line Burden Hours and Costs Tables*

*(i) Respondent tally.* The bottom line industry burden hours and costs, presented in Attachment 2, are calculated by summing the person-hours column and by summing the cost column. The burden and cost to the industry for 391 respondents is 59,265 hours and \$4,187,020. No capital or annualized costs are applicable, because this is a one-time submittal. O&M costs of \$6,549 are estimated for digital media (CD, DVD, or flash drive) and postage to mail in the survey response to the EPA. The estimated total cost of the ICR to PCWP facilities is 46,588 hours and \$3,289,362 and the estimated total cost of the ICR to lumber mills with dry kilns is 12,677 hours and \$897,658.

*(ii) Agency tally.* The bottom line Agency burden and cost, presented in Attachment 3, is calculated in the same manner as the industry burden and cost. The estimated burden and cost for 391 respondents is 12,046 hours and \$675,247, which includes \$6,243 in O&M costs to send certified CAA section 114 letters to all respondents with electronic return receipt, questionnaire printing costs, and computer storage of data received.

(iii) *The complex collection.* This ICR is a simple collection; therefore, this section does not apply.

(iv) *Variations in the annual bottom line.* This section does not apply, as this is a one-time collection.

(f) *Reasons for Change in Burden*

This is the initial estimation of burden for this information collection; therefore, this section does not apply.

(g) *Burden Statement*

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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 currently valid OMB control number. The OMB control numbers for the EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

The total cost burden for the PCWP data gathering effort is estimated to be 59,265 hours and \$4,187,020 (152 hours and \$10,692 for 391 respondents). This ICR does not include any requirements that would cause the respondents to incur either capital or start-up costs. O&M costs of \$6,549 (\$16.75 per respondent) are estimated for digital media (CD, DVD, or flash drive) and postage to mail in the survey response to the EPA. The total cost of the ICR to PCWP facilities is estimated to be 46,588 hours and \$3,289,362 (250 hours and \$17,668 for 186 respondents) and the total cost of the ICR to lumber mills with dry kilns is estimated to be 12,677 hours and \$897,658 (62 hours and \$4,362 for 205 respondents).

To comment on the EPA'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, the EPA has established a docket for this ICR under Docket ID No. EPA-HQ-OAR-2016-0243. 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 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 EPA Docket Center, EPA WJC West Building, Room Number 3334, 1301 Constitution Ave., NW, Washington, DC. The Public Reading Room hours of operation are 8:30 a.m. to 4:30 p.m. Eastern Standard Time (EST), Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the Docket Center is (202) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2016-0243 and OMB Control Number 2060-NEW in any correspondence.

**Part B of the Supporting Statement**

This part is not applicable because statistical methods are not used in data collection associated with the survey.

**Attachment 1.**  
**Draft Questionnaire Content<sup>7</sup>**

The draft electronic questionnaire may be found in separate files accompanying this supporting statement, including the following:

<b>File name</b>	<b>Description</b>
<i>PCWP_ICR_survey_instructions.docx</i>	<p>This is the survey instruction document. This file provides instructions for completing and submitting the survey (including confidential and non-confidential responses). The instruction document also contains the request for flow diagrams; a release point map; previous emissions test data (emissions test reports or CEMS data); emissions averaging plans; copies of air and wastewater discharge permits; lumber dry kiln schedules; and data supporting emissions estimates for wastewater operations, as applicable.</p> <p>The following appendices are included in the survey instruction document:</p> <ul style="list-style-type: none"> <li>1A Documentation of True Area Source, Non-Operational, or Non-Applicable Status</li> <li>1B Documentation of Synthetic Area Source Status</li> <li>2 Process Units to Include in the PCWP Survey Response</li> <li>3 Previous Emissions Test Reports Requested</li> <li>4 Acronyms and Abbreviations</li> <li>5 Checklist of Materials to Submit with Your Survey Response</li> <li>6A CEDRI Upload Instructions</li> <li>6B Instructions for CEDRI Registration Through CDX</li> <li>7 Plywood and Composite Wood Products NESHAP Definitions</li> <li>8 Industry Source Classification Codes</li> <li>9 List of Hazardous Air Pollutants</li> <li>10 Resources for Estimating Emissions</li> </ul>
<i>PCWP_survey.xlsx</i>	<p>This multi-tabbed spreadsheet file is the main portion of the survey. A listing of the tabs in this file is provided in Table 1, Section 4 of this supporting statement.</p>
<i>PCWP_CEMS.xlsx</i>	<p>This file contains templates for the requested CEMS data.</p>

<sup>7</sup> A docket for PCWP RTR has been created at [www.regulations.gov](http://www.regulations.gov), Docket ID No. EPA-HQ-OAR-2016-0243. Following publication of the notice for this ICR in the Federal Register, the most current version of the ICR documents will be maintained for public review in the PCWP RTR docket.



**Attachment 2.**  
**Industry Burden and Costs for Responding to the PCWP ICR**

<b>Respondent Activity</b>	<b>(A) Hours per Occurrence</b>	<b>(B) Occurrences/ Respondent/ Year</b>	<b>(C) Hours/ Respondent/ Year (A x B)</b>	<b>(D) Respondents/ Year<sup>1</sup></b>	<b>(E) Technical Hours/Year (C x D)</b>	<b>(F) Managerial Hours/Year (E x 0.05)</b>	<b>(G) Clerical Hours/Year (E x 0.10)</b>	<b>(H) Cost, \$/Year<sup>2</sup></b>
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
PCWP facilities	10	1	10	186	1,860	93	186	\$150,883
Lumber mills with dry kilns	5	1	5	205	1,025	51	102.5	\$83,148
B. Required Activities								
i. Complete and submit survey spreadsheet tabs, as follows:								
PCWP facilities								
Mill (general information) (Mill)	3	1	3	186	558	28	55.8	\$45,265
Products (Prod)	3	1	3	186	558	28	55.8	\$45,265
Equipment Detail (EquipDetail)	24	1	24	186	4,464	223	446.4	\$362,119
Release Point Detail (ReleasePt)	24	1	24	186	4,464	223	446.4	\$362,119
Permit	8	1	8	186	1,488	74	148.8	\$120,706
Resin	2	1	2	171	342	17	34.2	\$27,743
Tanks (Tank)	2	1	2	171	342	17	34.2	\$27,743
Veneer Dryer (VeneerDry)	4	1	4	104	416	21	41.6	\$33,746
Rotary Dryer (RotaryDry)	4	1	4	55	220	11	22	\$17,846
Tube Dryer (TubeDry)	4	1	4	25	100	5	10	\$8,112
Conveyor Dryer (ConvDry)	4	1	4	2	8	0	0.8	\$649
Fiberboard/Hardboard Equipment (FB_HB)	4	1	4	10	40	2	4	\$3,245
Lumber Kilns (LKiln)	4	1	4	29	116	6	11.6	\$9,410
Direct Fired Dryer Fuel (DFDryFuel)	6	1	6	93	558	28	55.8	\$45,265
Press	8	1	8	156	1,248	62	124.8	\$101,238
Board Coolers (BC)	2	1	2	38	76	4	7.6	\$6,165
EWP Press (EWP)	2	1	2	21	42	2	4.2	\$3,407
Other Equipment (OtherEquip)	4	1	4	186	744	37	74.4	\$60,353
Control Devices (APCD)	8	1	8	186	1,488	74	148.8	\$120,706
SSM	8	1	8	186	1,488	74	148.8	\$120,706
Miscellaneous Coatings (MiscCoat)	4	1	4	186	744	37	74.4	\$60,353
Wastewater (WW)	8	1	8	64	512	26	51.2	\$41,533
Emission Tests (EmTest) <sup>3</sup>	8	1	8	186	1,488	74	148.8	\$120,706

<b>Respondent Activity</b>	<b>(A) Hours per Occurrence</b>	<b>(B) Occurrences/ Respondent/ Year</b>	<b>(C) Hours/ Respondent/ Year (A x B)</b>	<b>(D) Respondents/ Year<sup>1</sup></b>	<b>(E) Technical Hours/Year (C x D)</b>	<b>(F) Managerial Hours/Year (E x 0.05)</b>	<b>(G) Clerical Hours/Year (E x 0.10)</b>	<b>(H) Cost, \$/Year<sup>2</sup></b>
HAP Emissions	80	1	80	186	14,880	744	1488	\$1,207,063
CEMS <sup>4</sup>	4	1	4	37	149	7	14.88	\$12,071
Certification	0.2	1	0.2	186	37	2	3.72	\$3,018
Lumber mills with dry kilns								
Mill (general information) (Mill)	3	1	3	205	615	31	61.5	\$49,889
Products (Prod)	3	1	3	205	615	31	61.5	\$49,889
Equipment Detail (EquipDetail) - Kilns only	4	1	4	205	820	41	82	\$66,518
Release Point Detail (ReleasePt) - Kilns only	6	1	6	205	1,230	62	123	\$99,777
Permit - Kilns only	2	1	2	205	410	21	41	\$33,259
Lumber Kilns (LKiln)	4	1	4	205	820	41	82	\$66,518
Direct Fired Dryer Fuel (DFDryFuel)	6	1	6	100	600	30	60	\$48,672
Control Devices (APCD) – Kilns only <sup>5</sup>	4	1	4	0	0	0	0	\$0
Emission Tests (EmTest) - Kilns only <sup>3</sup>	2	1	2	10	20	1	2	\$1,622
HAP Emissions - Kilns Only	16	1	16	205	3,280	164	328	\$266,073
Certification	0.2	1	0.2	205	41	2	4.1	\$3,326
ii. Organize and submit other requested materials:								
PCWP facilities								
Process flow diagrams	4	1	4	186	744	37	74.4	\$60,353
Release point map	1	1	1	186	186	9	18.6	\$15,088
Electronic copy permit	0.5	1	0.5	186	93	5	9.3	\$7,544
Emissions averaging plan	1	1	1	9	9	0	0.9	\$730
TANKS emission estimates (optional)	1	1	1	9	9	0	0.9	\$730
Lumber dry kiln schedules	2	1	2	29	58	3	5.8	\$4,705
Copies of semiannual compliance reports	1	1	1	186	186	9	18.6	\$15,088
Wastewater treatment plant flow diagrams	0.5	1	0.5	10	5	0	0.5	\$406
Wastewater treatment plant emission estimates	1	1	1	10	10	1	1	\$811
Wastewater treatment plant effluent limits	0.5	1	0.5	64	32	2	3.2	\$2,596
Plan demonstrating wet control device HAP destruction	0.5	1	0.5	10	5	0	0.5	\$406
Previous emissions test reports <sup>3</sup>	4	1	4	186	744	37	74.4	\$60,353
Lumber mills with dry kilns								
Process flow diagrams - kilns only	4	1	4	205	820	41	82	\$66,518
Release point map - kilns only	1	1	1	205	205	10	20.5	\$16,630
Electronic copy permit	0.5	1	0.5	205	103	5	10.25	\$8,315
Lumber dry kiln schedules	2	1	2	205	410	21	41	\$33,259
Previous emissions test reports <sup>3</sup>	1	1	1	10	10	1	1	\$811
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4B)								

Respondent Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year <sup>1</sup>	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost, \$/Year <sup>2</sup>
E. Write Report (Not Applicable)								
5. RECORDKEEPING REQUIREMENTS (Not applicable)								
<b>TOTAL ANNUAL LABOR BURDEN AND COST</b>					51,535	2,577	5,153	<b>\$4,180,471</b>
					Total Labor: 59,265			
					Avg. hr./facility: 152	Avg. \$/facility: \$10,692		
ANNUAL CAPITAL COSTS (Not Applicable)								
ANNUALIZED CAPITAL COSTS (Not Applicable)								
TOTAL ANNUAL COSTS (O&M) <sup>6</sup>								\$6,549
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$6,549
<b>TOTAL LABOR AND O&amp;M COSTS</b>								<b>\$4,187,020</b>

1. The number of respondents per year is based on the facility counts listed in Section 4(a) of the Supporting Statement. Although it is anticipated that some facilities will be synthetic area sources that would only be required to submit a 1-page response, the burden estimates have not been reduced because the EPA will use the survey results to confirm synthetic area source status. Based on the draft facility list, 35 PCWP and 2 lumber mills are potentially synthetic area sources that would spend 8 hours responding to the 1-page survey for a total cost savings of \$603,000 (based on the average cost per response).
2. Based on mean hourly wages in Bureau of Labor Statistics, *May 2016 National Industry-Specific Occupational Employment and Wage Estimates* for NAICS code 321000—Wood Product Manufacturing, available at [https://www.bls.gov/oes/current/naics3\\_321000.htm](https://www.bls.gov/oes/current/naics3_321000.htm). Final loaded labor rates are: Technical: \$72.20/hour (SOC 17-2000: Engineers), Managerial: \$106.16/hour (SOC 11-1021: General and Operations Managers), Clerical: \$36.14/hour (SOC 43-0000: Office and Administrative Support Occupations); all labor rates include 110 percent increase to account for fringe benefits and overhead expenses).
3. Estimated assuming that PCWP facilities that were required to install controls will submit four test reports each and that an estimated 5 percent of lumber mills will submit one test report for kilns. It is estimated that it will take each facility 2 hours per test report to locate the file, review the data, and enter data into the survey spreadsheet. It is also estimated that it will take each facility 1 hour per test report to scan the report and assemble files to send to the EPA.
4. Assumes 20 percent of PCWP facilities that were required to install controls will submit CEMS reports for 2016.
5. The EPA is not aware of any lumber kilns that currently have a control device, so it is estimated that there will be 0 respondents for the APCD tab.
6. Postage costs for mailing survey responses to the EPA are estimated at \$9.75 for Federal Express letter-size envelope flat rate (1 per respondent). The costs of digital media (CD, DVD, or flash drive) are estimated to be \$7 each. These costs would be reduced for facilities opting to upload their non-confidential responses using CEDRI.

**Attachment 3.**  
**Agency Burden and Costs for the PCWP ICR**

Agency Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Respondent/Year	(C) EPA Hours/ Respondent/Year (A x B)	(D) Respondents/ Year <sup>1</sup>	(E) EPA Technical Hours/Year (C x D)	(F) EPA Managerial Hours/Year (E x 0.05)	(G) EPA Clerical Hours/Year (E x 0.1)	(H) Cost, \$/Year <sup>2</sup>
Develop/revise questionnaire spreadsheets and instructions	400	1	400	1	400	20	40	\$25,548
Develop survey webpage	10	1	10	1	10	1	1	\$639
Mail out questionnaire <sup>3</sup>	0.7	1	0.7	391	274	14	27	\$17,481
Analyze and respond to claims that survey is not required to be completed due to area source status, facility closure, or because facility does not produce PCWP products <sup>4</sup>	1	1	1	59	59	3	6	\$3,746
Answer respondent questions via phone, email, and/or frequently asked questions posted on webpage <sup>5</sup>	1	1	1	98	98	5	10	\$6,243
Analyze requests for confidentiality <sup>6</sup>	1	1	1	98	98	5	10	\$6,243
Review and analyze responses (including follow-up)								
PCWP_survey.xlsx spreadsheet data	20	1	20	391	7820	391	782	\$499,454
PCWP_CEMS.xlsx spreadsheet data	4	1	4	37	149	7	15	\$9,504
Enter/analyze previous emissions test data <sup>7</sup>	2	4	8	196	1568	78	157	\$100,146
Total Annual Hours/Cost					10,475	524	1,047	\$669,003
					Total Labor:		12,046	
Expenses (O&M) <sup>8</sup>								
Printing questionnaire (letter and instructions)								\$391
Postage								\$3,812
Computer storage of data								\$2,040
Total O&M Expenses								\$6,243
<b>TOTAL ANNUAL LABOR BURDEN AND COST</b>								<b>\$675,247</b>

1. The number of respondents per year is based on the facility counts listed in Section 4 of the Supporting Statement.
2. Based on GS Scale 2017: Technical/GS 13-1: \$35.74/hour, Managerial/GS 15-1: \$49.68/hour, Clerical/GS 7-1: \$16.94/hour. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.
3. The mailout package includes section 114 letter with standard enclosures and a hard copy of the survey instruction document. Assumes the EPA will mail one questionnaire per facility.
4. Assumes 15 percent of facilities provide documentation of area source status, facility closure, or that PCWP processes are not performed at the facility. It is not known how many of these claims will be valid so this number of facilities has not been subtracted from the burden estimates associated with completing the survey.
5. Assumes that 25 percent of the facilities will have questions.
6. Assumes that 25 percent of facilities will have confidential data.
7. It is estimated that PCWP facilities that were required to install controls will submit 4 test reports each and that 5 percent of lumber mills will submit test data for kilns. Emissions test results within the range of other test results will require little time for analysis. Other tests, such as best performers, will require additional analysis. Expect to spend an average of 0.5 hr per test result.
8. Cost Estimate Basis: Copy costs for 20 pages at \$0.05/page; Postage Costs at \$9.75 for Federal Express letter-size envelope flat rate. Data storage at \$6/GB/month assuming 10 GB data for 24 months; webpage cost at \$600.