**Supporting Statement for Air Emission Standards for Tanks, Surface Impoundments and Containers (40 CFR part 264, subpart CC and 40 CFR part 265, subpart CC)**

## 1. Identification of the Information Collection

### 1(a) Title of the Information Collection

Air Emission Standards for Tanks, Surface Impoundments and Containers (40 CFR part 264, subpart CC and 40 CFR part 265, subpart CC)

### 1(b) Short Characterization/Abstract

The air emission standards for tanks, surface impoundments and containers at 40 CFR part 264, subpart CC and 40 CFR part 265, subpart CC were proposed on July 22, 1991 (56 FR 33490), and promulgated on December 6, 1994 (59 FR 62896). Amendments to this subpart were added on November 25, 1996 (61 FR 59931). The requirements of this subpart apply to owners and operators of all facilities that treat, store or dispose of hazardous wastes in tanks, surface impoundments and containers that are subject to subparts I, J or K of these parts except for Sections 264.1 and 265.1 and those management units identified at Sections 264.1080(b) and 265.1080(b). Also, the requirements of this subpart apply to large quantity generators that manage hazardous wastes in either tanks or containers (262.34(a)(1)(i and ii)).

RCRA subpart CC requires controls for minimizing the release of volatile organic air emissions from tanks, surface impoundments and containers holding hazardous waste. Records and reports are necessary to determine that the standards are implemented and maintained to protect human health and the environment. All reports are sent to the delegated State. In the event that there is no delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office. The data collected by the affected facility is retained at the facility for a minimum of three years.

The potential number of respondents subject to these regulations is 6,209 over the next three years. This number was derived by the following methodology. It was estimated during rule development that 70% of treatment, storage and disposal facilities (TSDFs) and 25% of large quantity generators (LQGs) would be subject to RCRA subpart CC requirements. Based on information obtained from the RCRA Info database, there are 2,393 TSDFs and 18,135 LQGs. The regulated universe is the sum of applicable TSDFs and LQGs. Therefore, the following applies:

70% of 2,393 = 1,675 (TSDFs subject to RCRA subpart CC)
25% of 18,135 = 4,534 (LQGs subject to RCRA subpart CC)
1,675 + 4,534 = 6,209 respondents subject to RCRA subpart CC.

The estimated respondent burden for this Information Collection Request (ICR) is 711,409 hours at a cost of $45,214,335. Furthermore, the available data shows that no new facilities will become subject to RCRA subpart CC in the next three years.

OMB approved the currently active ICR without any ATerms of Clearance."

## 2. Need for and Use of the Collection

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

Organic air emissions from hazardous waste TSDFs can contain toxic chemical compounds. Cancer and other adverse noncancerous human health effects can result from exposure to these emissions. Also, organic air emissions from TSDFs react photochemically with other compounds in the atmosphere to form ozone. Excessive ambient ozone concentrations are a major air quality problem in many cities throughout the United States. Nationwide organic air emissions from TSDFs are estimated to be approximately 1 million megagrams per year.

In 1984, Congress passed the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) of 1976. Section 3004(n) of HSWA directs the EPA to promulgate regulations for the monitoring and control of air emissions from TSDFs as may be necessary to protect human health and the environment. Recommended standards have been developed by the EPA under the authority of Sections 3002 and 3004 of RCRA to reduce organic air emissions from certain TSDF tanks, surface impoundments, and containers; and certain hazardous waste generator accumulation tanks.

The experience of the EPA in implementing and enforcing New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) promulgated under authority of the Clean Air Act has demonstrated that certain information must be collected to ensure compliance with air emission standards. Information collection is needed by the EPA for this rulemaking to determine: a) whether a hazardous waste contains sufficiently low concentrations of volatile organics to allow the waste to be managed in a tank, surface impoundment, or container without the use of emission controls, and b) for units requiring emission controls, whether the controls are being properly operated and maintained.

### 2(b) Practical Utility/Users of the Data

The recommended standards are applicable to Treatment, Storage and Disposal facilities (TSDF) subject to the existing RCRA Subtitle C permitting requirements. The standards require organic emission control equipment to be used on permitted and interim-status TSDF tanks, surface impoundments and containers that manage hazardous waste with an average volatile organic concentration at the point of waste generation greater than or equal to

500 parts per million by weight (ppmw) on a mass-weighted average basis. In addition, the recommended standards are applicable to hazardous waste generators accumulating hazardous wastes in tanks and containers pursuant to conditions specified in 40 CFR part 262.34 (a). These units are exempt from RCRA Subtitle C permitting requirements provided the waste generator accumulates waste in the unit for no more than 90 days and complies with the control requirements specified in 40 CFR part 265, subparts I and J.

The standards are not applicable to certain waste management units. For example, the requirements of the subpart CC standards do not apply to: 1) a tank or surface impoundment in which an owner or operator stops adding hazardous waste and begins undergoing closure or which is closed in accordance with existing RCRA regulations; 2) a container that has a design capacity less than 0.1 cubic meters (26.4 gallons); or 3) a tank, surface impoundment or container that contains hazardous waste prior to the rule's effective date if no new hazardous waste is added to the unit on or after the effective date.

Each owner or operator of an affected tank, surface impoundment or container is required by the recommended standards to comply with the requirements summarized below.

i. Standards for Tanks

The owner or operator of a tank used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw at the point of waste generation is required to install and use emission control equipment. The control equipment requirements are to install, operate, and maintain either a cover connected through a closed-vent system to a control device, an external floating roof, a fixed roof with an internal floating cover, or a pressure tank that operates with no detectable organic air emissions. An owner or operator is allowed to use a cover without a closed-vent system and control device on a tank that satisfies all of the following conditions: 1) the hazardous waste managed in the tank is not mixed, stirred, agitated, or circulated within the tank by the owner or operator using a process that results in splashing, frothing, or visible turbulent flow on the waste surface during normal process operations; 2) no waste fixating, heat-using (except the minimum heating required to prevent waste freezing or to maintain adequate waste flow conditions for continuing normal process operations during cold weather), or heat generating process is conducted in the tank; and 3) either the tank capacity is less than 75 $m^3$ (20,000 gallons) and the maximum organic vapor pressure is less than 76.6 kilopascals (kPa) [11.1 pounds per square inch (psi)], the tank capacity is less than 151 $m^3$ (40,000 gallons) and the maximum organic vapor pressure is less than 27.6 kPa (4.0 psi), or the capacity of the tank is equal to or greater than 151 $m^3$ and the maximum organic vapor pressure is less then 5.2 kPa (0.75 psi).

ii. Standards for Surface Impoundments.

The owner or operator of a surface impoundment used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw at the point

of waste generation is required to install and use emission control equipment. The control equipment requirement is to install, operate and maintain either a cover or enclosure connected through a closed-vent system to a control device. An owner or operator is allowed to use a contact cover (e.g., floating membrane cover) without a closed-vent system and control device on a surface impoundment that satisfies all of the following conditions: 1) the hazardous waste managed in the surface impoundment is not mixed, stirred, agitated, or circulated within the surface impoundment by the owner or operator using a process that results in splashing, frothing, or visible turbulent flow on the waste surface during normal process operations; and 2) no waste fixating, heat treating or heat-generating process is conducted in the surface impoundment.

iii. Standards for Containers.

The owner or operator of a container used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw is required to use the following procedures. The owner or operator must place the hazardous waste either into a container equipped with a cover that operates with no detectable organic air emissions when all openings are secured in a closed, sealed position; or a container having a design capacity less than or equal to 0.42 $m^3$ (110 gallons) that complies with all applicable Department of Transportation regulations for packaging hazardous waste for transport under 49 CFR part 178; or a container that is attached to or forms a part of any truck, trailer, or railcar and has been tested for organic vapor tightness within the preceding 12 months in accordance with EPA Method 27. A container is required to be covered except when waste is being added, removed, inspected, or sampled or the container is vented in accordance with good engineering and safety practices for handling flammable, combustible, explosive, or other hazardous materials. A loading operation conducted by pumping into a container having a design capacity greater than or equal to 0.42 $m^3$ (110 gallons) must be performed using a conveyance system that uses a tube (e.g., pipe or hose) to add waste into the container below the waste surface or within 15.2 cm (6 inches) of the bottom of the container. A container used for waste fixation is required (during the fixation process) to be located in an enclosure with a closed-vent system that is operating with sufficient airflow to capture and route all organic vapors vented from the container to a control device. The enclosure may have permanent or temporary openings but must be maintained at a pressure below atmospheric pressure such that whenever an open container is placed inside the enclosure no organic vapors released from the container exit through the openings.

iv. Standards for Closed-Vent Systems and Control Devices.

The requirements under the recommended subpart CC standards for an individual closed-vent system with control device are identical to those already applicable to TSDF owners and operators under subpart AA in 40 CFR parts 264 and 265. The subpart AA standards were promulgated in June of 1990 and require TSDF owners and operators to use closed-vent systems and control devices to control organic air emissions from process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping

operations at a TSDF.

v. Waste Determinations.

If an owner or operator chooses to determine that a particular tank, surface impoundment, or container is not subject to specific control requirements on the basis of the volatile organic concentration at the point of waste generation or organic vapor pressure of the hazardous waste being managed in the unit, the owner or operator is required to perform periodic waste determinations. Either direct measurement or knowledge of the waste is used to determine that a waste contains a mass-weighted average concentration at the point of waste generation of less than 500 ppmw volatile organics or is below the organic vapor pressure limit.

Direct measurement of the waste volatile organic concentration or organic liquid vapor pressure is performed using EPA reference test methods. Knowledge constitutes documentation that conclusively shows that the waste volatile organic concentration or organic vapor pressure is below the specified limit under all conditions. For example, a company that generates a hazardous waste as a result of manufacturing a product could provide the EPA with evidence that no volatile organic chemicals are used in the manufacturing process.

The waste determination for a waste generated as a continuous flow needs to be performed initially before the first time any portion of the hazardous waste is placed in a unit subject to the final standards and repeated at least annually. In addition, the owner or operator is required to perform a new waste determination whenever changes to the process generating or treating the hazardous waste could potentially cause the average volatile organic concentration to increase to or above 500 ppmw or cause the treatment process performance to decline below the minimum efficiency requirements specified in the rule. For a hazardous waste that is generated as a discrete quantity of material from a batch process, sequenced or intermittent operation, or non-continuous source, the waste determination must be performed for each discrete quantity of hazardous waste generated before the waste is placed in a waste management unit not controlled for organic air emissions.

vi. Monitoring and Inspection Requirements.

To ensure that emission control equipment is properly operated and maintained, the recommended standards require the owner or operator to include certain emission control equipment items as part of the inspections the owner or operator is already conducting to comply with existing RCRA standards (e.g., 40 CFR 264.195 for tanks, 40 CFR 264.254 for surface impoundments, 40 CFR 264.174 for containers). During the visual inspections, emission control equipment covers on tanks are to be checked semiannually by the facility workers to ensure that equipment is being used properly (i.e., covers are closed and latched except when an opening must be used in accordance with conditions specified in the rules) and the equipment is being maintained in good condition (e.g., no visible holes, gaps, tears, or splits have developed in

covers).

Continuous monitoring of control device operation is required under the rules. This involves the use of automated instrumentation to measure critical operating parameters that indicate whether the control device is operating correctly or is malfunctioning. Semiannual leak detection monitoring using EPA Reference Method 21 also is required for certain cover components to ensure gaskets and seals are in good condition, and for closed-vent systems to ensure all fittings remain leak-tight. In addition, each closed-vent system must be monitored for leaks using Reference Method 21 at least once per year.

vii. Recordkeeping Requirements.

To provide the EPA enforcement personnel with a means of verifying compliance with the recommended standards, the owner or operator is required to record certain information documenting emission control equipment performance and maintenance in the on-site facility operating logs or files. This information will be available for review by the EPA enforcement personnel during on-site compliance inspection. The information to be collected and recorded includes: the results of all waste determinations such as of volatile organic concentration at the point of generation and organic vapor pressure; waste determination documentation for units not using air emission controls in accordance with the rule control requirements; design specifications for closed-vent systems and control equipment inspection and control equipment; emission control equipment inspection and monitoring results; Reference Method 27 test results; control device exceedances and actions taken to remedy them; leak repairs; management of carbon removed from carbon adsorption systems, and identification of equipment fittings designated as difficult or unsafe to monitor or inspect.

At a facility where air emission control equipment required by the recommended rules cannot be in operation by the effective date, the owner or operator is required to prepare and record an implementation schedule for the air emission control equipment. The implementation schedule must specify dates by which progress will be completed by the facility owner or operator that demonstrates and ensures the required air emission controls are in operation no later than three years after promulgation of the rules.

Consistent with 40 CFR Sections 264.73 and 265.73, the recommended standards require that all records be maintained in the facility operating record until facility closure except records and results of inspections and monitoring, which need to be kept for at least three years from the date of entry.

viii. Reporting Requirements.

The recommended reporting requirements for the owner or operator of a TSDF are simple and straightforward. There are no reporting requirements for the owner or operator of an interim status TSDF. The owner or operator of a permitted TSDF is not required to submit any

reports unless: 1) a control device malfunction is not corrected within 24 hours of detection; or 2) a hazardous waste with organic content at the point of waste generation that equals or exceeds the 500 ppmw mass-weighted average volatile organic concentration or that has been treated by a process that fails to meet applicable general requirements in the recommended rule is managed in a unit without proper emission controls. If any of these events (referred to as "exceedances") occur, the owner or operator is required to maintain a record of the exceedance. For control device exceedance, the owner or operator is required to submit a written report to the EPA on a semiannual basis describing any exceedances that occurred during the past 6-month period and explain why each exceedance occurred and what action was taken to return to compliance. For waste exceedances, the owner or operator is required to submit a written report to the EPA within 15 calendar days of the time that the owner or operator becomes aware of the circumstances explaining why the hazardous waste was not managed in accordance with the requirements of the standards.

For some TSDF tanks, an owner or operator is allowed to use either a fixed roof with an internal floating cover or an external floating roof as an alternative to a cover vented to a control device. Reporting requirements for internal and external floating roofs require the owner or operator to notify the EPA at least 30 days prior to the filling of the empty tank to provide the EPA the opportunity to inspect the roof and seals for compliance with the standards prior to refilling. This requirement is necessary because the internal or external roof seals can only be inspected when the tank is empty. Inspection is required initially and no more than once every five years for external floating roofs and 10 years for internal floating roofs.

The collected information will be used by the EPA enforcement personnel to ensure that the requirements of the recommended rules are being properly applied and that emission control devices are being properly operated and maintained on a continuous basis. In addition, records and reports are necessary to enable the EPA to identify TSDF owners or operators that may not be operating in compliance with the standards. The reported information is used by the EPA to target TSDFs for inspection and identify what records or waste management units should be inspected at the TSDF. The information that TSDF owners or operators are required to maintain is recorded in sufficient detail to enable owners or operators to demonstrate their means of complying with the applicable standards. The data collected by the affected facility is retained at the facility for a minimum of three years. In addition, the information collected from the recordkeeping and reporting requirements is of sufficient quality to be used as evidence in court.

## 3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR parts 264 and 265.

### 3(a) Nonduplication

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 agency.

**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 on October 5, 2006 (71 FR 58853). No comments were received on the burden published in the Federal Register.

**3(c) Consultations**

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility System) which is operated and maintained by EPA's Office of Compliance. AFS is EPAs database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 6,209 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. The American Petroleum Institute (API) was contacted on September 6, 2007 and asked to provide comments on the ICR renewal. The API declined the opportunity to provide comments.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice. In this case, no comments were received.

**3(d) Effects of Less Frequent Collection**

If the information required by the standard was not collected, the Agency would have no means for ensuring that compliance with RCRA subpart CC is achieved and maintained by large quantity generators and treatment, storage or disposal facilities. Under these circumstances, an owner or operator could elect to reduce operating expenses by not installing, maintaining, or otherwise operating, the cover, roof or control technology required by the standards. In the absence of the information collection requirements, compliance with the standards could be ensured only through continuous on-site inspections by regulatory agency personnel. Consequently, not collecting the information would result in either greatly increased expenditures of resources, or the inability to ensure compliance with the standards.

Respondents are required to submit reports only when circumstances occur at the facility that result in improper management of hazardous waste in units not using the required air emission controls, and when a control device malfunction cannot be corrected within 24 hours of being detected. There are no reporting requirements for owners and operators of interim-status TSDFs (subject to the requirements of 40 CFR part 264). Owners and operators of permitted TSDFs (subject to the requirements of 40 CPR part 265) must report within 15 calendar days, circumstances resulting in the management of hazardous waste subject to the rules in a tank, surface impoundment, or container not using the required air emission controls. In addition, an owner or operator of a permitted TSDF that uses a control device to comply with the requirements of the rules must submit a semiannual written report of any exceedances that may occur, as defined in the rules. If no exceedances have occurred during the reporting period, no report is required.

The recommended rules require the TSDF owner or operator to record certain information to the on-site facility operating logs or files. Consistent with 40 CFR 264.73 and 40 CFR 265.73, the rules require that air emission control equipment design records, and certain other records be maintained in the facility operating record until facility closure. Records and results of waste determinations, inspections, monitoring, control device exceedances and actions taken to remedy them, leak repairs, and management of carbon removed from carbon adsorption systems are required to be kept for at least 3 years from the date of entry.

All reports are to be submitted to the EPA Regional Office (or delegated State) having jurisdiction for a particular TSDF location. The reports must be signed and dated by an authorized representative of the facility owner or operator. The information is needed by the EPA to identify facilities where the owners or operators are having difficulty complying with the requirements of the rules.

**3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5 (d)(2).

**3(f) Confidentiality**

The required information consists of emissions data and other information that have been determined not to be private. However, 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 (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**

None of the reporting or recordkeeping requirements contain sensitive questions.

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are facilities that treat, store, or dispose of RCRA Subtitle C hazardous waste. Refer to the following table for the applicable Standard Industrial Classification (SIC)/North American Industry Classification System (NAICS) codes.

| Regulation | SIC Codes | NAICS Codes |
|---|---|---|
| RCRA subpart CC - Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers | 20 thru 39 Series | 31 thru 33 Series |

**4(b) Information Requested**

(i) Data Items

All data in this ICR that are recorded and/or reported is required by 40 CFR part 264 and part 265, RCRA subpart CC - Air Emission Standards for Tanks, Surface Impoundments and Containers.

A source must make the following reports:

| Notification Reports | |
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| The owner or operator notifies the RA in writing that hazardous waste generated by an organic peroxide manufacturing process or processes meeting the conditions of paragraph (d)(1) of this section are managed at the facility in tanks or containers meeting the conditions of paragraph (d)(2) of this section. | 264.1080(d)(3) |
| Notwithstanding the exemption, the Stonewall Plant at Elkton, WV must still comply with 264.1085 and all that is referenced there including complying with 264.1087, 264.1089 and the part of 264.1090 applicable to surface impoundments and/or closed-vent systems and control devices. | 264.1080(e)(2) |
| The Sistersville, WV plant shall provide to the EPA and WVDEP written notification of the actual date of initial startup of the thermal incinerator, and commencement of the methanol recovery operation. | 264.1080(f)(2)(i)(B) |
| Prior to each inspection of the internal floating roof the owner or operator shall notify the RA in advance of each inspection to provide the RA with the opportunity to have an observer present during the | 264.1084(e)(3)(iv)<br>265.1085(e)(3)(iv) |

| Notification Reports | |
|---|---|
| inspection | |
| Prior to each visual inspection of an internal floating roof in a tank that has been emptied and degassed, written notification shall be prepared and sent by the owner or operator so that it is received by the RA at least 30 calendar days before refilling the tank except when an inspection is not planned as provided for in paragraph (e)(3)(iv)(B) of this section | 264.1084(e)(3)(iv)(A)<br>265.1085(e)(3)(iv)(A) |
| When a visual inspection is not planned and the owner or operator could not have known about the inspection 30 calendar days before refilling the tank, the owner or operator shall notify the RA as soon as possible, but no later than 7 calendar days before refilling of the tank | 264.1084(e)(3)(iv)(B)<br>265.1085(e)(3)(iv)(B) |

| Reports | |
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| The reporting requirements of 264.1090 are applicable to the Sistersville, WV plant and are applicable to surface impoundments and closed-vent systems with control devices associated with surface impoundments | 264.1080(f)(1)(iv) |
| The Sistersville, WV plant shall comply with the reporting requirements of paragraphs 264.1080(f)(2)(viii)(A) through (G) of this section. | 264.1080(f)(1)(viii) |
| Each owner or operator managing hazardous waste in a tank, surface impoundment, or container exempted from using air emission controls as specified under 40 CFR 264.1082(c) shall report to the RA each occurrence when hazardous waste is placed in a waste management unit in noncompliance with 40 CFR 264.1082(c)(1) or (c)(2) of this part, as applicable. The owner or operator shall submit a written report within 15 calendar days of the time that they become aware of the occurrence. | 264.1090(a) |
| Each owner or operator using air emission controls on a tank in accordance with 40 CFR 264.1084(c) of this subpart shall report to the RA each occurrence when hazardous waste is managed in a tank | 264.1090(b) |

| Reports | |
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| in noncompliance with 40 CFR 264.1084(b) of this subpart. The owner or operator shall submit a written report within 15 calendar days of the time that they become aware of the occurrence. | |
| Each owner or operator using control device in accordance with 40 CFR 264.1087 of this subpart shall submit a semiannual report to the RA. | 264.1090(c) |
| A report to the RA in accordance with the requirements of paragraph (c) of this section is not required for a 6 month period during which all control devices subject to this subpart are operated by the owner or operator such that:<br>(1) During no period of 24 hours or longer did a control device operate continuously in noncompliance with the applicable operating values defined in 264.1035(c)(4); and<br>(2) No flare was operated with visible emissions for 5 minutes or longer in a 2-hour period, as defined in 264.1033(d). | 264.1090(d) |

A source must keep the following records.

| Recordkeeping | |
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| The owner or operator must keep a written operating record of his facility. | 264.73<br>265.73 |
| The requirements of this subpart, except for the recordkeeping requirements specified in 264.1089(i) of this subpart, are administratively stayed for a tank or container used for the management of hazardous waste generated by organic peroxide manufacturing.<br><br>The requirements of this subpart, except for the recordkeeping requirements specified in 264.1090(i) of this subpart, are administratively stayed for a tank or container used for the management of hazardous waste generated by organic peroxide manufacturing. | 264.1080(d)<br><br>265.1080(d) |
| The owner or operator prepares documentation in accordance with 264.1089(i) of this subpart, explaining why an undue safety hazard would be created if air emission controls | 264.1080(d)(2)<br><br>265.1080(d)(2) |

| Recordkeeping | |
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| specified in 264.1084 through 264.1087 of this subpart are installed and operated on the tanks and containers used at the facility to manage the hazardous waste generated by the organic peroxide manufacturing process or processes meeting the conditions of paragraph (d)(1) of this section.<br><br>The owner or operator prepares documentation in accordance with 264.1090(i) of this subpart, explaining why an undue safety hazard would be created if air emission controls specified in 264.1085 through 264.1088 of this subpart are installed and operated on the tanks and containers used at the facility to manage the hazardous waste generated by the organic peroxide manufacturing process or processes meeting the conditions of paragraph (d)(1) of this section. | |
| The Sistersville, WV plant shall keep on-site, up to date records of the information described in paragraphs (f)(2)(ii)(C)(1) through ((f)(2)(ii)(C)(4) of this section. | 264.1080(f)(2)(ii)(C)<br><br>265.1080(f)(2)(ii)(C) |
| The Sistersville, WV plant shall develop and implement a startup plan as required by the provisions set forth in paragraph (f)(2)(ii)(D) of this section. | 264.1080(f)(2)(ii)(D)(1)<br><br>265.1080(f)(2)(ii)(D)(1) |
| The Sistersville, WV plant shall maintain a record of the defect repair in accordance with the requirements specified in paragraph (f)(2)(iii)(D) of this section. | 264.1080(f)(2)(iii)(C)(3)(ii)<br><br>265.1080(f)(2)(iii)(C)(3)(ii) |
| The Sistersville, WV plant shall keep on site up to date readily accessible records of the inspections and repairs required to be performed by paragraph (f)(2)(iii) of this section. | 264.1080(f)(2)(iii)(D)<br><br>265.1080(f)(2)(iii)(D) |
| The Sistersville, WV plant shall record the dates and times during which the capper unit and the condenser are operating. | 264.1080(f)(2)(iv)(B)(3)<br><br>265.1080(f)(2)(iv)(B)(3) |
| The Sistersville, WV plant shall keep on site up to date records of the parameters specified to be monitored under paragraph (f)(2)(iv)(B) of this section. | 264.1080(f)(2)(iv)(C)<br><br>265.1080(f)(2)(iv)(C) |
| The Sistersville, WV plant shall keep on site up to date readily accessible records of the amounts of collected methanol directed to reuse, recovery, thermal recovery/treatment and | 264.1080(f)(2)(v)(C)<br><br>265.1080(f)(2)(v)(C) |

| Recordkeeping | |
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| biotreatment necessary for the measurements required under paragraph 264.1080(f)(2)(iv)(B) of this section.<br><br>The Sistersville, WV plant shall keep on site up to date readily accessible records of the amounts of collected methanol directed to reuse, recovery, thermal recovery/treatment and biotreatment necessary for the measurements required under paragraph 265.1080(f)(2)(iv)(B) of this section. | |
| The Sistersville, WV plant shall maintain on site each record required by paragraph 264.1080(f)(2) of this section through the MON compliance date.<br><br>The Sistersville, WV plant shall maintain on site each record required by paragraph 265.1080(f)(2) of this section through the MON compliance date. | 264.1080(f)(2)(vii)<br><br>265.1080(f)(2)(vii) |
| Within 30 days of the date the Sistersville Plant receives written notice of the revocation under paragraph (f)(3)(iv) of this section, the Sistersville Plant shall enter and maintain in the facility operating record an implementation schedule. | 264.1080(g)(1)(ii)<br><br>265.1080(g)(1)(ii) |
| Perform initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this section and thereafter at least once per year. | 264.1084(c)(4)(ii)<br>265.1085(c)(4)(ii) |
| Maintain a record of the inspection required by 264.1084(c)(4)(ii) in accordance with the requirements in 264.1089(b) of this subpart.<br><br>Maintain a record of the inspection required by 264.1085(c)(4)(ii) in accordance with the requirements in 265.1090(b) of this subpart. | 264.1084(c)(4)(iv)<br><br>264.1085(c)(4)(iv) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(b) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(b) of this subpart. | 264.1084(e)(3)(vi)<br><br>265.1085(e)(3)(vi) |
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| Recordkeeping | |
|---|---|
| The owner or operator shall perform measurements of the gaps between the tank wall and the primary seal within 60 calendar days after initial operation of the tank following installation of the floating roof and thereafter, at least once every 5 years. | 264.1084(f)(3)(i)(A)<br><br>265.1085(f)(3)(i)(A) |
| The owner or operator shall perform measurements of the gaps between the tank wall and the secondary seal within 60 calendar days after initial operation of the tank following installation of the floating roof and thereafter, at least once every year. | 264.1084(f)(3)(i)(B)<br><br>265.1085(f)(3)(i)(B) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(b) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(b) of this subpart. | 264.1084(f)(3)(i)(F)<br><br>265.1085(f)(3)(i)(F) |
| The owner or operator shall perform an initial inspection of the external floating rook and its closure devices on or before the date that the tank becomes subject to this standard. Thereafter the owner or operator shall perform these inspections at least once every year. | 264.1084(f)(3)(ii)(B)<br><br>265.1085(f)(3)(ii)(B) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(b) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(b) of this subpart. | 264.1084(f)(3)(ii)(D)<br><br>265.1085(f)(3)(ii)(D) |
| Prior to each inspection of the external floating roof the owner or operator shall notify the RA in advance of each inspection to provide the RA with the opportunity to have an observer present during the inspection. | 264.1084(f)(3)(iii)<br><br>265.1085(f)(3)(iii) |
| Prior to each inspection to measure external floating roof seal gaps as required under paragraph (f)(3)(i) of this section, written notification shall be prepared and sent by the owner or operator so that it is received by the RA at least 30 calendar | 264.1084(f)(3)(iii)(A)<br><br>265.1085(f)(3)(iii)(A) |

| Recordkeeping | |
|---|---|
| days before the measurements are scheduled to be performed. | |
| Prior to each visual inspection of the external floating roof in a tank that has been emptied and degassed, written notification shall be prepared and sent by the owner or operator so that it is received by the RA at least 30 calendar days before refilling the tank except when an inspection is not planned as provided for in paragraph (f)(3)(iii)(C) of this section. | 264.1084(f)(3)(iii)(B)<br><br>265.1085(f)(3)(iii)(B) |
| When a visual inspection is not planned and the owner or operator could not have known about the inspection 30 calendar days before refilling the tank, the owner or operator shall notify the RA as soon as possible, but no later than 7 calendar days before refilling of the tank. | 264.1084(f)(3)(iii)(C)<br><br>265.1085(f)(3)(iii)(C) |
| The owner or operator shall perform an initial inspection of the air emission control equipment on or before the date that the tank becomes subject to this section. Thereafter the owner or operator shall perform these inspections at least once every year. | 264.1084(g)(3)(iii)<br><br>265.1085(g)(3)(iii) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(b) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(b) of this subpart. | 264.1084(g)(3)(v)<br><br>265.1085(g)(3)(v) |
| The owner or operator who uses an enclosure vented through a closed-vent system to an enclosed combustion control device to control air pollution emission shall perform the verification procedure for the enclosure as specified in Section 5.0 to AProcedure T-Criteria for and Verification of a Permanent of Temporary Total Enclosure" initially when the enclosure is first installed and, thereafter annually. | 264.1084(i)(1)<br><br>265.1085(i)(1) |
| Prepare a written explanation for the cover stating the reasons why the cover is unsafe to inspect and monitor | 264.1084(l)(1)(i)<br><br>265.1085(l)(1)(i) |

| **Recordkeeping** | |
|---|---|
| Develop and implement a written plan and schedule to inspect and monitor the cover, using the procedures specified in the applicable section of this subpart, as frequently as practicable during those times when a worker can safely access the cover. | 264.1084(l)(1)(ii)<br><br>265.1085(l)(1)(ii) |
| The owner or operator shall perform an initial inspection of the floating membrane cover and its closure devices on or before the date that the surface impoundment becomes subject to this section. Thereafter the owner or operator shall perform these inspections at least once every year. | 264.1085(c)(3)(ii)<br><br>265.1086(c)(3)(ii) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(c) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(c) of this subpart. | 264.1085(c)(3)(iv)<br><br>265.1086(c)(3)(iv) |
| The owner or operator shall perform an initial inspection of the air emission control equipment on or before the date that the surface impoundment becomes subject to this section. Thereafter the owner or operator shall perform these inspections at least once every year. | 264.1085(d)(3)(iii)<br><br>265.1086(d)(3)(iii) |
| The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 264.1089(c) of this subpart.<br><br>The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in 265.1090(c) of this subpart. | 264.1085(d)(3)(v)<br><br>265.1086(d)(3)(v) |
| Prepare a written explanation for the cover stating the reasons why the cover is unsafe to visually inspect or to monitor, if required. | 264.1085(g)(1)<br><br>265.1086(g)(1) |
| Develop and implement a written plan and schedule to inspect and monitor the cover using the procedures specified in the applicable section of this subpart as frequently as practicable during those times when a worker can safely access the cover. | 264.1085(g)(2)<br><br>265.1086(g)(2) |

| Recordkeeping | |
|---|---|
| When a hazardous waste is already in the container at the time the owner or operator first accepts possession of the container and the container is not emptied within 24 hours after the container is accepted the owner or operator shall visually inspect the container and its cover and closure devices. | 264.1086(c)(4)(i)<br>264.1086(d)(4)(i)<br><br>265.1087(c)(4)(i)<br>265.1087(d)(4)(i) |
| When a container used for managing hazardous waste remains at the facility for a period of one year or more the owner or operator shall visually inspect the container and its cover and closure devices initially and thereafter at least once every 12 months. | 264.1086(c)(4)(ii)<br>264.1086(d)(4)(ii)<br><br>265.1087(c)(4)(ii)<br>265.1087(d)(4)(ii) |
| The owner or operator shall maintain at the facility a copy of the procedure used to determine that containers with capacity of 0.46 cubic meters or greater, which do not meet the DOT regulations as specified in paragraph (f) of this section, are not managing hazardous waste in light material service. | 264.1086(c)(5)<br><br>265.1087(c)(5) |
| Owners or operators that use Container Level 3 controls in accordance with the provisions of this subpart shall prepare and maintain the records specified in 264.1089(d) of this subpart.<br><br>Owners or operators that use Container Level 3 controls in accordance with the provisions of this subpart shall prepare and maintain the records specified in 264.1089(d) of this subpart. | 264.1086(e)(5)<br><br>265.1087(e)(5) |
| For closed-vent systems and control devices the closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed shall be visually inspected at least once per year. | 264.1033(l)(1)(ii)(A) |
| Closed vent components or connections other than those specified in paragraph (l)(1)(ii)(A) of this section shall monitor annually and at other times specified by the RA. | 264.1033(l)(1)(ii)(B) |
| For closed-vent systems and control devices that operate at pressure below atmospheric pressure the owner or operator shall perform an initial inspection of the closed vent system on or before the system becomes subject to this section, and at least once per year. | 264.1033(l)(2)(ii) |

| **Recordkeeping** | |
|---|---|
| The owner or operator shall maintain a record of the inspection and monitoring in accordance with the requirements specified in 264.1035 of this subpart. | 264.1033(l)(2)(iv) |
| The owner or operator shall maintain a record of the defect repair in accordance with the requirements specified in 264.1035 of this subpart. | 264.1033(l)(3)(iv) |
| The owner or operator using a carbon adsorption system to control air pollution emissions shall document the proper disposal of spent hazardous carbon. | 264.1034(n) |
| The owner or operator shall demonstrate compliance with the requirement that period of planned routine maintenance of the control device, during which the control device does not properly control emissions as required by 264.1087(c)(1), shall not exceed 240 hours, by recording the information specified in 264.1089(e)(1)(v).<br><br>The owner or operator shall demonstrate compliance with the requirement that period of planned routine maintenance of the control device, during which the control device does not properly control emissions as required by 265.1088(c)(1), shall not exceed 240 hours, by recording the information specified in 265.1090(e)(1)(v). | 264.1087(c)(2)(iv)<br><br>265.1088(c)(2)(iv) |
| The owner or operator shall develop and implement a written plan and schedule to perform the inspections and monitoring required by paragraph (a) of this section. The owner or operator shall incorporate this plan and schedule into the facility inspection plan required under 40 CFR 264.15.<br><br>The owner or operator shall develop and implement a written plan and schedule to perform the inspections and monitoring required by paragraph (a) of this section. The owner or operator shall incorporate this plan and schedule into the facility inspection plan required under 40 CFR 265.15. | 264.1088(b)<br><br>265.1089(b) |
| Each owner or operator of a facility subject to the requirements of this subpart shall record and maintain the information specified in paragraphs (b) through (j) of this section. | 264.1089(a)<br><br>265.1090(a) |

| Recordkeeping | |
|---|---|
| The owner or operator of a tank using air emission controls in accordance with the requirements of 264.1084 of this subpart shall prepare and maintain records.<br><br>The owner or operator of a tank using air emission controls in accordance with the requirements of 265.1085 of this subpart shall prepare and maintain records. | 264.1089(b)<br><br>265.1090(b) |
| The owner or operator of a surface impoundment using air emission controls in accordance with the requirements of 264.1085 of this subpart shall prepare and maintain records for the surface impoundment.<br><br>The owner or operator of a surface impoundment using air emission controls in accordance with the requirements of 265.1086 of this subpart shall prepare and maintain records for the surface impoundment. | 264.1089(c)<br><br>265.1090(c) |
| The owner or operator of containers using Container Level 3 air emission controls in accordance with the requirements of 264.1086 of this subpart shall prepare and maintain records.<br><br>The owner or operator of containers using Container Level 3 air emission controls in accordance with the requirements of 265.1087 of this subpart shall prepare and maintain records. | 264.1089(d)<br><br>265.1090(d) |
| The owner or operator using a closed-vent system and control device in accordance with the requirements of 264.1087 of this subpart shall prepare and maintain records.<br><br>The owner or operator using a closed-vent system and control device in accordance with the requirements of 265.1088 of this subpart shall prepare and maintain records. | 264.1089(e)<br><br>265.1090(e) |

| **Recordkeeping** | |
|---|---|
| The owner or operator of a tank, surface impoundment, or container exempted from standards in accordance with the provisions of 264.1082(c) of this subpart shall prepare and maintain records.<br><br>The owner or operator of a tank, surface impoundment, or container exempted from standards in accordance with the provisions of 265.1083(c) of this subpart shall prepare and maintain records. | 264.1089(f)<br><br>265.1090(f) |
| An owner or operator designating a cover as “unsafe to inspect and monitor” pursuant to 264.1084(l) or 264.1085(g) of this subpart shall record in a log kept in the facility operating record the following information: The identification numbers for waste management units with covers that are designated as Aunsafe to inspect and monitor,” the explanation for each cover stating why the cover is unsafe to inspect and monitor, and the plan and schedule for inspecting and monitoring each cover.<br><br>An owner or operator designating a cover as “unsafe to inspect and monitor” pursuant to 265.1085(l) or 265.1086(g) of this subpart shall record in a log kept in the facility operating record the following information: The identification numbers for waste management units with covers that are designated as “unsafe to inspect and monitor,” the explanation for each cover stating why the cover is unsafe to inspect and monitor, and the plan and schedule for inspecting and monitoring each cover. | 264.1089(g)<br><br>265.1090(g) |
| The owner or operator of a facility that is subject to this subpart and to the control device standards in 40 CFR part 60, subpart VV, or 40 CFR part 61, subpart V, may elect to demonstrate compliance with the applicable sections of this subpart by documenting either pursuant to this subpart, or pursuant to the provisions of 40 CFR part 60, subpart VV or 40 CFR part 61, subpart V, to the extent that the documentation required by 40 CFR parts 60 and 61 duplicates the documentation required by this section. | 264.1089(h)<br><br>265.1090(h) |

| **Recordkeeping** | |
|---|---|
| For each tank or container not using air emission controls specified in 264.1084 through 264.1087 of this subpart in accordance with the conditions specified in 264.1080(d) of this subpart shall record and maintain the following information:<br>(1) A list of the individual organic peroxide compounds manufactured at the facility that meet the conditions specified in 264.1080(d)(1)<br>(2) A description of how the hazardous waste containing the organic peroxide compounds identified in paragraph (i)(1) are managed at the facility in tanks and containers.<br>(3) An explanation of why managing the hazardous waste containing the organic peroxide compounds identified in paragraph (i)(1) of this section in the tanks and containers as described in paragraph (i)(2) of this section would create an undue safety hazard if the air emission controls, as required under 264.1084 through 264.1087 of this subpart, are installed and operated on these waste management units.<br><br>For each tank or container not using air emission controls specified in 265.1085 through 265.1088 of this subpart in accordance with the conditions specified in 265.1080(d) of this subpart shall record and maintain the following information:<br>(1) A list of the individual organic peroxide compounds manufactured at the facility that meet the conditions specified in 265.1080(d)(1)<br>(2) A description of how the hazardous waste containing the organic peroxide compounds identified in paragraph (i)(1) are managed at the facility in tanks and containers.<br>(3) An explanation of why managing the hazardous waste containing the organic peroxide compounds identified in paragraph (i)(1) of this section in the tanks and containers as described in paragraph (i)(2) of this section would create an undue safety hazard if the air emission controls, as required under 265.1085 through 265.1088 of this subpart, are installed and operated on these waste management units. | 264.1089(i)<br><br>265.1090(i) |
| (1) Certification that the waste management unit is equipped with and operating air emission controls in accordance with the requirements of an applicable Clean Air Act regulation codified under 40 CFR part 60, part 61, or part 63.<br>(2) Identification of the specific requirements codified under 40 | 264.1089(j)<br><br>265.1090(j) |

| Recordkeeping | |
|---|---|
| CFR part 60, part 61, or part 63 with which the waste management unit is in compliance. | |

**(ii) Respondent Activities**

| Respondent Activities |
|---|
| Read instructions. |
| Sample waste streams and make waste determinations at the point of generation. |
| Install, calibrate, maintain, and operate floating roof or vapor recovery system. |
| Take gap measurements, inspect primary and secondary roofs. |
| Write the notifications and reports listed above - 4(b)(i) Reports |
| Enter information required to be recorded above - 4(b)(i) Recordkeeping |
| Inspect and monitor difficult and/or unsafe tank roofs. |
| Monitor and inspect cover fittings, roofing systems, closed-vent systems. |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information. |
| 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. |
| Transmit, or otherwise disclose the information. |

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

### 5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

| Agency Activities |
|---|
| Review notifications and reports required to be submitted by industry. |
| Inspect the facility for compliance including records and reports. |
| Input, analyze, and maintain data in the RCRA Info database. |

### 5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect a facility to determine whether pollution control devices are properly installed and operated, and determine compliance with 40 CFR parts 264 and 265. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. Also, reports are used to identify problems and determine compliance at facilities.

Publication and distribution of the information are part of the Resource Conservation and Recovery Information System (RCRA Info) which is jointly operated and maintained by the EPA's Office of Solid Waste (OSW) and Office of Compliance (OC). Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program. The records required by 40 CFR parts 264 and 265 must be retained at the facility by the owner or operator for 3 years.

### 5(c) Small Entity Flexibility

The EPA recognizes that owners or operator of small businesses often do not have the personnel and financial resources available to large companies for performing information collection. However, in EPA's experience the information required by the standard is necessary to determine compliance with air emission standards. Separate and simplified requirements for small businesses such as less frequent monitoring and inspection of emission control equipment operation cannot be used without compromising the protection of human health and the environment that would be provided by the recommended standards. The minimum information that the EPA's experience has demonstrated to be necessary to determine compliance with air emission standards is required. The specific information selected serves both the public interest, by ensuring all TSDFs comply with the air emission standards, and the best interest of the individual owner or operator to clearly demonstrate to the EPA compliance inspector that a unit

is in compliance.

The reporting, notification and recordkeeping burden to respondents has been minimized by requiring the collection or reporting of only that information which the Agency considers essential to ensure that affected storage tanks, surface impoundments and containers of hazardous waste exceeding 500 ppmw are properly maintained and operated on a continuous basis.

For this ICR renewal, the Background Information Document (EPA-450/3-89-023a) for the proposed rulemaking was reviewed to estimate the number of affected small businesses. Section 8.3.6 of this document indicates that 10 percent of the facilities are likely to be small businesses. Thus, 620 respondents are estimated to be small businesses in this ICR renewal.

### 5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Costs as a Result of RCRA subpart CC, Air Emission Standards for Tanks, Surface Impoundments and Containers.

## 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 RCRA subpart CC. 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 in this ICR. Responses to this information collection are mandatory. The 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.

### 6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated at 711,409 person-hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the RCRA program, the previously approved ICR, and any comments received.

### 6(b) Estimating Respondent Costs

### (i) Estimating Labor Costs

This ICR uses a Technical Labor Rate of $64.47 per hour, a Management Labor Rate of $93.09 per hour, and a Clerical Labor Rate of $39.65 per hour. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, “Table 10. Private industry,

by occupational and industry group." The rates are from column 1, "Total compensation." The wage rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

**(ii) Estimating Capital and Operations and Maintenance Costs**

The only costs to the regulated industry resulting from the information collection activities required by the subject standards are labor and operation and maintenance costs. There are no capital/startup costs.

**(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs**

The operations and maintenance cost for the regulated industry is estimated to be $12,418,000 annually. This assumes a cost of $2,000 per facility. There are no capital/startup 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 regulated facilities and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $287,866 (See Table 2 below). For estimating government cost this ICR uses a Technical Labor Rate of $40.08 per hour, a Management Labor Rate of $54.02 per hour, and a Clerical Labor Rate of $21.70 per hour. These rates are from the Office of Personnel Management (OPM) "2003 General Schedule" which excludes locality rates of pay. These rates can be obtained from the OPM web site, http:www.opm.gov/oca/payrates/index/htm. Details upon which this estimate is based appear in Table 2: Average Annual EPA Resource Requirement as a Result of RCRA subpart CC, Air Emission Standards for Tanks, Surface Impoundments and Containers, below.

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

Based on our research for this ICR, approximately 6,209 existing facilities are currently subject to the standard. It is estimated that no additional facilities will become subject to the standard in the next three years. The number of respondents and the total annual responses were derived using the following assumptions and, by using the "Number of Respondents" and "Total Annual Responses" tables that follow.

It was estimated during rule development that 70% of treatment storage and disposal facilities (TSDFs) and 25% of large quantity generators (LQGs) would be subject to RCRA subpart CC requirements. Based on information obtained from RCRA Info data, there are 2,393

TSDFs and 18,135 LQGs. The regulated universe is the sum of applicable TSDFs and LQGs. Therefore, the following applies:

Regulated Universe

70% of 2,393 = 1,675 (TSDFs subject to RCRA subpart CC)
25% of 18,135 = 4,534 (LQGs subject to RCRA subpart CC)

1,675 + 4,534 = 6,209 respondents subject to RCRA subpart CC.

Semiannual Reporting

It is assumed that 0.5% of control devices malfunction resulting in the need for a semiannual report. The Sistersville Plant XL project always reports semiannually.

0.5% of 6209 = 31

31 + Sistersville Plant = 32 (Semiannual Reports)

Other Reports

For exceedances it is assumed that 1% of waste determination results in exceedance annually. This would result in the need for a report to EPA within 15 calendar days. Therefore, 1% of the regulated universe would submit a report to EPA within 15 calendar days, once per year.

1% of 6209 = 62 (report to EPA within 15 calendar days, once per year)

Notification Reports

It is assumed that 10% of internal floating roofs and 20% of external floating roofs will require notifications annually. One facility notifies EPA that they will use the hydrogen peroxide management exemption (40 CFR 264.1080(d) and 40 CFR 265.1080(d).

10% of 6,209 = 621
20% of 6,209 = 1,242

1,242 + 621 + Facility using hydrogen peroxide exemption = 1,864 (Notification Reports)

1,864 + 62 = 1,926 (Annual Reports)

1,926 + 32 = 1,958 (Number of Existing Respondents that Submit Reports)

| Number of Respondents | | | | | |
|---|---|---|---|---|---|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
| Year | (A) Number of New Respondents [1] | (B) Number of Existing Respondents | (C) Number of Existing Respondents that keep records but do not submit reports | (D) Number of Existing Respondents That Are Also New Respondents | (E) Number of Respondents (E=A+B+C-D) |
| 1 | 0 | 1,958 | 4,251 | 0 | 6,209 |
| 2 | 0 | 1,958 | 4,251 | 0 | 6,209 |
| 3 | 0 | 1,958 | 4,251 | 0 | 6,209 |
| Average | 0 | 1,958 | 4,251 | 0 | 6,209 |

As shown above, the average Number of Respondents over the three year period of this ICR is 6,209. The total number of annual responses per year is calculated using the following table.

The total annual capital/start-up costs to the regulated entity are $0 and annual O&M costs to the regulated entity are $12,418,000. These costs are detailed in section 6(b)(iii) Capital/Start-up vs. Operation and Maintenance (O&M) Costs.

### 6(e) Bottom Line Burden Hours And Cost Tables

The bottom line burden hours and cost tables for both the respondents and the Agency appear below. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 114 hours per response.

### 6(f) Reasons for Change in Burden

There is a small decrease in burden (68 hours) from the most recently approved ICR. This change in burden is due to the correction of a mathematical error from the previous ICR renewal.

### 6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 114 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's 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-2006-0705. 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), EPA 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 Enforcement and Compliance Docket and Information Center Docket is (202)

566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0705 and OMB Control Number 2060-0318 in any correspondence.

**Part B of the Supporting Statement**

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

# APPENDIX A
# BURDEN TABLES

**Table 1: Annual Respondent Burden and Costs as a Result of RCRA subpart CC, Air Emission Standards for Tanks, Surface Impoundments and Containers.**

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| 1. Applications | NA | | | | | | | |
| 2. Survey and Studies | NA | | | | | | | |
| 3. Reporting Requirements | | | | | | | | |
| A. Read Instructions | 4 | 1 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| B. Required Activities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| C. Create Information | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| D. Gather Existing Information | 1 | 1 | 1 | 6,209 | 6,209 | 310 | 621 | 453,775 |
| E. Write Report | | | | | | | | |
| F. Annual Project Report[b] | 1 | 1 | 1 | 1 | 1 | 0.05 | 0.1 | 73 |
| G. Final Project Report[b] | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| H. Report required by 264.1080(f)(2) (viii)(F)[b] | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| I. Semiannual Report[c] | 1 | 2 | 2 | 32 | 64 | 3.2 | 6.4 | 4,678 |
| J. Report to EPA within 15 calendar days of waste determination exceedance[d] | 1 | 1 | 1 | 62 | 124 | 6.2 | 12.4 | 9,063 |
| J. Notify EPA/WVDEP 60 days in advance for performance test of | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| incinerator[b] | | | | | | | | |
| K. Performance test results report for Sistersville Plant[b] | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| L. Notification regarding hydrogen peroxide management[h] | 1 | 1 | 1 | 1 | 1 | 0.05 | 0.1 | 73 |
| M. Notify RA 30 days in advance of any gap measurements to be taken | 1 | 1 | 1 | 1,242[e] | 1,242 | 62 | 124 | 90,761 |
| N. Notify RA 30 days in advance of filling or refilling tank | 1 | 1 | 1 | 621[f] | 621 | 31 | 62 | 45,380 |
| 4. Recordkeeping Requirements | | | | | | | | |
| A. Recordkeeping for Sistersville, WV plant[g] | | | | | | | | |
| I. Prepare and record documentation that air emission control present undue hazard | 1 | 1 | 1 | 1 | 1 | 0.05 | 0.1 | 73 |
| II. Information going into annual report | | | | | | | | |
| a. Emissions analysis | 0.33 | 1 | 0.33 | 1 | 0.33 | 0.02 | 0.03 | 24 |
| b. Plant performance | 0.33 | 1 | 0.33 | 1 | 0.33 | 0.02 | 0.03 | 24 |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| evaluation | | | | | | | | |
| c. Description of anticipated problems | 0.33 | 1 | 0.33 | 1 | 0.33 | 0.02 | 0.03 | 24 |
| III. Startup/ shutdown plan | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| IV. Records of defect repair | 0.5 | 2 | 1 | 1 | 1 | 0.05 | 0.1 | 73 |
| V. Records of the inspection and repair of the closed-vent system | 0.5 | 2 | 1 | 1 | 1 | 0.05 | 0.1 | 73 |
| VI. Record dates and time that capper unit and condenser are operating | 0.25 | 365 | 91 | 1 | 91 | 5 | 9 | 6,689 |
| VII. Record amount of methanol generated and recovered; and condenser temperature. | 0.25 | 365 | 91 | 1 | 91 | 5 | 9 | 6,689 |
| VIII. Records of amounts of methanol directed to reuse, recovery, thermal recovery/ treatment and biotreatment | 0.25 | 365 | 91 | 1 | 91 | 5 | 9 | 6,689 |
| B. Read Instructions | 4 | 1 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| C. Plan Activities | 16 | 1 | 16 | 6,209 | 99,344 | 4,967 | 9,934 | 7,260,969 |
| D. Implement Activities | | | | | | | | |
| I. Waste determination for VO | | | | | | | | |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| concentration at the point of origin | | | | | | | | |
| a. Waste determination once every 12 months | 2 | 1 | 2 | 6,209 | 12,418 | 621 | 1,242 | 907,642 |
| II. Waste determination for treated hazardous waste | | | | | | | | |
| a. Waste determination for batch process once every 12 months | 2 | 1 | 2 | 6,209 | 12,418 | 621 | 1,242 | 907,642 |
| III. Inspect and monitor each closed vent system | 0.08 | 365 | 29 | 3,105 | 90,045 | 4,502 | 9,005 | 6,581,340 |
| IV. Write and implement an inspection plan and place in facility inspection plan | 4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 |
| V. Inspect all coverings and monitor for initial detectable emissions, initial operation, using Method 21 | | | | | | | | |
| a. Tanks | 4 | 1 | 4 | 0 | 0 | 0 | 0 | 0 |
| b. Surface Impoundments | 5 | 1 | 5 | 0 | 0 | 0 | 0 | 0 |
| c. Containers | 2 | 1 | 2 | 0 | 0 | 0 | 0 | 0 |
| VI. Inspect all coverings and monitor for detectable emissions at least once every 6 | | | | | | | | |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| months using Method 21 | | | | | | | | |
| a. Tanks (Includes Method 27 - Transportation vehicles) | 4 | 2 | 8 | 6,209 | 49,672 | 2,484 | 4,967 | 3,630,532 |
| b. Surface Impoundments | 5 | 2 | 10 | 119 | 1,190 | 60 | 119 | 87,022 |
| c. Containers | 2 | 2 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| VII. Owner/operator writes and implements plan with schedule to inspect unsafe covers | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 |
| VIII. Owner/operator writes and implements plan with schedule to inspect difficult to inspect covers | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 |
| IX. Secondary seal inspection once a year | 4 | 1 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| X. Primary seal inspection once every 5 years | 4 | 1 | 4 | 1,242[d] | 4,968 | 248 | 497 | 363,079 |
| XI. General standards, Record ID number of BIF or incinerator used to treat waste | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| XII. Tanks with unsafe covers, record list of ID numbers for tanks with unsafe covers, explain why it=s unsafe and plan to inspect and monitor | 0.3 | 1 | 0.3 | 0 | 0 | 0 | 0 | 0 |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| each cover | | | | | | | | |
| XIII. Tanks with difficult to inspect covers, record list of ID numbers, explain why difficult and plan to inspect and monitor each cover | 0.3 | 1 | 0.3 | 0 | 0 | 0 | 0 | 0 |
| E. Develop Record System | 16 | 1 | 16 | 0 | 0 | 0 | 0 | 0 |
| F. Time to Enter Information | | | | | | | | |
| I. Record each cover installed on a tank and certifies to its specifications | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| II. Record each floating membrane installed on a surface impoundment and certifies to its specifications | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| III. Record each enclosure used to control air emissions and certifies to its specifications | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| IV. Record for each closed vent and control device it is designed to operate at the performance level for tank, surface impoundment or container | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| V. Records all Method 27 tests | 0.5 | 1 | 0.5 | 6,209 | 3,105 | 155 | 311 | 226,939 |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| performed by owner/operator for each container | | | | | | | | |
| VI. Records all visual inspections of each tank, surface impoundment and container, including covers | 1 | 1 | 1 | 6,209 | 6,209 | 310 | 621 | 453,775 |
| Tanks with air emission controls: | | | | | | | | |
| VII. Records date of each attempts to repair leak, repair methods applied and date of successful repair | 0.5 | 2 | 1 | 6,209 | 6,209 | 310 | 621 | 453,775 |
| VIII. Records all continuous monitoring | 0.25 | 365 | 91 | 621 | 56,511 | 2,826 | 5,651 | 4,130,399 |
| IX. Records management of carbon removed from a carbon adsorption system | 0.5 | 2 | 1 | 3,105 | 3,105 | 155 | 311 | 226,939 |
| X. Records date and time of each sample | 0.25 | 2 | 0.5 | 6,209 | 3,105 | 155 | 311 | 226,939 |
| XI. Records results of each sample | 0.25 | 2 | 0.5 | 6,209 | 3,105 | 155 | 311 | 226,939 |
| XII. Records tank dimensions and design capacity | 0.3 | 1 | 1 | 0 | 0 | 0 | 0 | 0 |
| Tanks with alternative emission controls (floating | | | | | | | | |

| Requirements | Tech. Hours/ Occur. (A) | Occur./ Plant/ Year (B) | Hours/ Rspndnt. (C) (C=A x B) | Number of Rspndnts. (D) | Technical Hours/ Year (E) (E=C x D) | Management Hours /Year (F) (F=0.05 x E) | Clerical Hours/Year (G) (G=0.1 x E) | Total Cost/ Year ($) (H)[a] |
|---|---|---|---|---|---|---|---|---|
| roofs): | | | | | | | | |
| XIII. Records in the facility operating plan the internal floating roof | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| XIV. Records the equipment design and certifies that it meets applicable requirements | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| XV. Records each inspection, the tank, date, and what components were inspected | 0.25 | 2 | 0.5 | 6,209 | 3,105 | 155 | 311 | 226,939 |
| a. If defects found, identify the tank and describe the repairs made | 0.25 | 2 | 0.5 | 6,209 | 3,105 | 155 | 311 | 226,939 |
| XVI. Records in the facility operating plan the external floating roof | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| XVII. Records the equipment design and certifies that it meets applicable requirements | 0.25 | 1 | 0.25 | 0 | 0 | 0 | 0 | 0 |
| XVIII. Records gap measurements of the tank, date of inspection, raw data and calculations | 0.25 | 1 | 0.25 | 6,209 | 1,552 | 78 | 155 | 113,464 |
| a. If defects found, records the tank, date tank was emptied or repairs made and the nature of | 0.25 | 1 | 0.25 | 6,209 | 1,552 | 78 | 155 | 113,464 |

| **Requirements** | **Tech. Hours/ Occur. (A)** | **Occur./ Plant/ Year (B)** | **Hours/ Rspndnt. (C) (C=A x B)** | **Number of Rspndnts. (D)** | **Technical Hours/ Year (E) (E=C x D)** | **Management Hours /Year (F) (F=0.05 x E)** | **Clerical Hours/Year (G) (G=0.1 x E)** | **Total Cost/ Year ($) (H)[a]** |
|---|---|---|---|---|---|---|---|---|
| the repair | | | | | | | | |
| XIX. Continuous Monitoring Inspections | | | | | | | | |
| a. Closed-Vent Systems | 4 | 1 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| XX. Roof Inspections/ Gap Measurements: | | | | | | | | |
| a. Secondary seal inspection (once a year) | 4 | 1 | 4 | 6,209 | 24,836 | 1,242 | 2,484 | 1,815,286 |
| b. Primary seal inspection (once every 5 years) | 4 | 0.2 | 0.8 | 1,242[d] | 994 | 50 | 99 | 72,663 |
| G. Train Personnel | | | | | | | | |
| I. Waste determination methods | 8 | 1 | 8 | 6,209 | 49,672 | 2,484 | 4,967 | 3,630,532 |
| II. Control equipment inspection and monitor | 8 | 1 | 8 | 6,209 | 49,672 | 2,484 | 4,967 | 3,630,532 |
| H. Audits | | | | | | | | |
| **TOTAL LABOR BURDEN AND COST (rounded)** | | | | | **711,409** | | | **$45,214,335** |

## Assumptions for Table 1:

a - This cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x $64.47) + (Management hours x $93.09) + (Clerical hours x $39.65).
b - Reporting for Sistersville, WV Plant XL Project only.
c -Assume 0.5% of control devices malfunction resulting in exceedance ( 0.5% of 6,209= 31). The Sistersville Plant XL project always reports semiannually, so 31 + 1= 32 semiannual reports.
d - Assume 1% waste determination results in exceedance annually (1% of 6,209 = 62)
e - Assume that 20% of the tank roofs will be inspected each year (external roof).
f - Assume 10% of respondents will empty and refill a tank (internal floating roof).
g - Recordkeeping for Sistersville, WV Plant XL Project only.
h - Currently only one facility uses the exemption regarding hydrogen peroxide management located at 40 CFR 264.1080(d) and 40 CFR 265.1080(d).

Total number of respondents subject to TSDF requirements = 2,393
70% subject to these rules = 1,675
Total number of respondents subject to LQG requirements = 18,135
25% subject to these rules = 4,534
Total number of respondents = 6,209

1,675 TSDFs averaging 4 tanks and 15 containers subject to regulations
4 Tanks x 1,675 = 6,700
15 containers x 1,675 = 25,125

4,534 LQGs averaging 1 tank (25%) or 6 containers (75%) subject to regulations
1 tank x 4,534 x 0.25 = 1,134
6 containers x 4,534 x 0.75 = 20,403

Total tanks subject = 5,742
Total containers subject = 36,499
10% of containers using cover and closed-vent system = 3,650
Total surface impoundments = 91

Respondents using Method 25D for waste determinations = 10%
Respondents reporting waste exceedances = 1%
Respondents reporting control device operating parameter exceedances = 0.5%
Average number of waste streams on-site = 10

**Table 2: Average Annual EPA Resource Requirement as a Result of RCRA subpart CC, Air Emission Standards for Tanks, Surface Impoundments and Containers.**

| Activity | Technical Hrs/ Occurrence (A) | Number of Responses/ Yr. (B) | Technical Hrs/ Yr. (C) (C = A x B) | Management Hours/ Yr. (D) (D=0.05 x C) | Clerical Hours/ Yr. (E) (E=0.1 x C) | Total Labor Costs/ Yr. ($) (D)[a] |
|---|---|---|---|---|---|---|
| 1. Review Reports | | | | | | |
| A. Waste exceedance reports | 4 | 62[b] | 252 | 13 | 25 | 11,345 |
| B. Control device exceedance reports | 4 | 31[c] | 128 | 6 | 13 | 5,736 |
| C. Notification reports | 1 | 1,864[d] | 1,864 | 93.2 | 186.4 | 83,789 |
| 2. Review Records | | | | | | |
| A. Select site and review permit | 8 | 520 | 4,160 | 208 | 416 | 186,996 |
| **TOTAL LABOR BURDEN AND COST (rounded)** | | | **7,365** | | | **$287,866** |

Assumptions for Table 2:

a - This cost is based on the sum of personnel hours multiplied by their hourly labor rates [(Technical hours x $40.08) + (Management hours x $54.02) + (Clerical hours x $21.70).
b - Annual responses assumes 1% of waste determination results in an exceedance (1% of 6,209 potential respondents).
c - Semiannual responses assumes 0.5% of control devices malfunction resulting in an exceedance (0.5% of 6,209 potential respondents), plus the Sistersville, WV Plant.
d - Annual responses assumes 10% of 6,209 (internal floating roof) plus 20% of 6,209 (external roof) will submit notification reports.