

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 0976.13  
“2007 Hazardous Waste Report”**

September 18, 2007

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title and Number of the Information Collection**

This Information Collection Request (ICR) is entitled the “2007 Hazardous Waste Report”, also known as the Biennial Report. EPA ICR No. 0976.13.

### **1(b) Characterization of the Information Collection**

This ICR is a renewal of an ongoing information collection request for reporting by hazardous waste generators and treatment, storage, or disposal facilities (TSDFs) required by the Resource Conservation and Recovery Act of 1976 (RCRA). RCRA Sections 3002 and 3004, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), require reporting to the Environmental Protection Agency or to authorized States at least every two years. The 2007 Hazardous Waste Report [EPA Form 8700-13 Form A/B], or comparable State report, is used by generators and TSDFs to satisfy this requirement.

Hazardous waste generators and TSDFs report information on the quantities, type, and management method of generated hazardous wastes and hazardous wastes received from off-site. The data collected are used by EPA’s Office of Solid Waste (OSW) to prepare a national report that is made available to Congress and the public, summarizing hazardous waste generation and management activities. The data also are used by EPA and the States for programmatic and regulatory needs.

Data are collected from respondents on Biennial Report forms, or comparable State forms, either on paper or in electronic media, and entered into an electronic database by State and Regional environmental authorities. States coordinate with EPA Regions and Headquarters to supply EPA with the data for inclusion in a national database, RCRAInfo. EPA maintains the Biennial Report data in RCRAInfo.

Once an initial version of the national database is compiled, EPA coordinates a national data quality review process with States and EPA Regions to identify cases where the State or EPA Region may wish to confirm that data were correctly entered; or to contact a regulated entity to confirm what they reported and to provide them with the opportunity to submit an updated report if the original contained errors. Following submittal of final data from States and EPA Regions, EPA prepares a National Biennial Hazardous Waste Report based on data for the specific year. EPA’s Information Quality Guidelines specify procedures for correcting data; EPA updates data in RCRAInfo when errors are found and posts notes in the published information and data files available through the EPA Internet page. (See information about the Hazardous Waste Report at - <http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/index.htm>)

For the 2007 cycle, we will use the same booklet as for the 2005 Biennial Report with some minor editorial changes to the instructions, and one change to the form itself as discussed

below.

On August 5, 2005 EPA published a final rule which, among other things, amended the list of federal Universal Wastes to include all mercury-containing equipment, and not just thermostats (see 70 FR 45508). The August 5<sup>th</sup> rule also amended the notification regulations found at §273.32 by removing the requirement for large quantity handlers of Universal Waste to list the types of Universal Waste they are accumulating. EPA felt it was unnecessarily burdensome for large quantity handlers of Universal Waste to list separately the types of Universal Waste they are generating and the types of Universal Waste they are accumulating. Now large quantity handlers of Universal Waste need only list the types of Universal Waste they are managing, regardless if it was generated by them or is being sent to and accumulated by them.

To accommodate these changes to the Universal Wastes rule, EPA has changed block 10.B. of the Site ID form for the 2007 Hazardous Waste Report. The old block 10.B. and the revised block 10.B. are shown in the table below, with the affected language in italics:

OLD	REVISED (2007)																																						
<p><b>B. Universal Waste Activities</b></p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> 1. <b>Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more)</b> [refer to your State regulations to determine what is regulated]. <i>Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:</i></p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;"></th> <th style="text-align: center; border-bottom: 1px solid black;">Generate</th> <th style="text-align: center; border-bottom: 1px solid black;">Accumulate</th> </tr> </thead> <tbody> <tr><td>a. Batteries</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>b. Pesticides</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>c. Thermostats</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>d. Lamps</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>e. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>f. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>g. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td><td style="text-align: center;"><input type="checkbox"/></td></tr> </tbody> </table> <p>Y <input type="checkbox"/> N <input type="checkbox"/> 2. <b>Destination Facility for Universal Waste</b>  <b>Note:</b> A hazardous waste permit may be required for this activity.</p>		Generate	Accumulate	a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>	e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>	f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>	g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>B. Universal Waste Activities</b></p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> 1. <b>Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more)</b> [refer to your State regulations to determine what is regulated]. <i>Indicate the types of universal waste managed at your site. Mark all boxes that apply:</i></p> <p style="text-align: center;"><b>Managed</b></p> <table style="width: 100%; border-collapse: collapse;"> <tbody> <tr><td>a. Batteries</td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>b. Pesticides</td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>c. <i>Mercury-containing equipment</i></td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>d. Lamps</td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>e. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>f. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr> <tr><td>g. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr> </tbody> </table> <p>Y <input type="checkbox"/> N <input type="checkbox"/> 2. <b>Destination Facility for Universal Waste</b>  <b>Note:</b> A hazardous waste permit may be required for this activity.</p>	a. Batteries	<input type="checkbox"/>	b. Pesticides	<input type="checkbox"/>	c. <i>Mercury-containing equipment</i>	<input type="checkbox"/>	d. Lamps	<input type="checkbox"/>	e. Other (specify) _____	<input type="checkbox"/>	f. Other (specify) _____	<input type="checkbox"/>	g. Other (specify) _____	<input type="checkbox"/>
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## 2. NEED FOR AND USE OF THE COLLECTION

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

This subsection establishes the need and legal authority for the information collection.

#### Need for the Information Collection

RCRA requires EPA to establish standards for generators and TSDFs to protect human health and the environment. Specifically included are provisions requiring the submission of

data on waste generation and management.

There are a number of uses of Biennial Report data. EPA uses Biennial Report data for planning and developing regulations. Also, Biennial Report data allows the Agency to determine whether its regulations are having the desired effect on the generation and management of hazardous waste. For example, Biennial Report data provides information on whether wastes have shifted from one method of disposal to another. Some State uses of Report data include support of planning, fee assessment, compliance monitoring, and enforcement. See more details in Section 2(b).

### **Legal Authority for the Information Collection**

RCRA Sections 3002 and 3004 authorize the Hazardous Waste Report. Both sections require EPA to establish standards for recordkeeping and reporting of hazardous waste. Section 3002 applies to hazardous waste generators and Section 3004 applies to hazardous waste treatment, storage, and disposal facilities. The implementing regulations are found at 40 CFR parts 262.40(b) and (d); 262.41(a)(1)-(5), (a)(8), and (b); 264.75(a)-(e) and (j); 265.75(a)-(e) and (j); and 270.30(l)(9). This is mandatory reporting by the respondents.

Section 3002(a)(6) requires submission of reports to EPA or the States at least every two years on the:

- Quantities and nature of hazardous wastes that have been generated during the year, and
- Disposition of these hazardous wastes.

Section 3004(a) requires EPA to issue regulations establishing performance standards applicable to owners and operators of facilities for the treatment, storage, or disposal of hazardous waste that include:

- Reporting and maintaining records of all hazardous wastes treated, stored, or disposed and the manner in which such wastes were treated, stored, or disposed.

## 2(b) Use and Users of the Data

Implementation of the RCRA program requires the collection of information on the characteristics of the regulated community generally (e.g., number of generators and TSDFs), as well as the specific characteristics of individual sites (e.g., waste handling activities undertaken). This information is used for waste activity monitoring, compliance monitoring, technical assistance, program planning, waste minimization, and other program activities taken by EPA and the States. The information is also used by public interest groups (such as the Right-to-Know Network) and industry.

The Biennial Report also provides information to States for tracking shipments of waste. Many States do not collect or track manifests, which provide, information on off-site shipments of hazardous waste; therefore, the Biennial Report serves as the only source of this information.

EPA compiles and publishes the *National Biennial RCRA Hazardous Waste Report* based on the data for each odd number reporting year. (The reports for 1989 to 2005 are available on the Internet.) EPA and states have many uses for Hazardous Waste Report information, including:

- describing the various source activities that generate hazardous waste and the generated waste types and quantities;
- describing the management methods by which the waste is treated, disposed, or recycled and the quantities managed by each method;
- providing information for analysis of trends in waste generation, waste treatment and disposal, recycling, and source reduction;
- understanding how much waste a state receives from out of state or sends out of state; and
- estimating available capacity for treating, recycling, and disposing hazardous wastes.

Additionally, EPA utilizes the Biennial Report information for planning and developing regulations; regulation development depends on descriptions and quantities of generated hazardous waste and management methods used for treatment, recycling, and disposal. The information allows the Agency to determine whether regulations are having the desired effect on the generation and management of hazardous waste; for example, the report provides information on whether the treatment of wastes has shifted from one method to another. EPA also uses the information for conducting technical assistance, planning facility inspections, and carrying out regulatory enforcement. States use the information for many of the same purposes as EPA; other state uses include planning, setting waste minimization goals, assessing fees, monitoring compliance, and carrying out enforcement.

EPA and states receive requests for the information from many public and private organizations including government agencies, businesses, public interest groups, and interested citizens. Many requests come from businesses that supply chemicals, equipment, and services to

hazardous waste generators and TSDFs.

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Nonduplication**

No other federal agency collection satisfies the statutory requirements of RCRA Sections 3002 and 3004 for reporting of hazardous waste generation and management. None of this information duplicates information collected by other EPA program offices or other federal agencies. The RCRA site identification information is collected on one common form - the RCRA Subtitle C Site Identification Form - for the Hazardous Waste Report, Notification of Regulated Waste Activity, and the RCRA Hazardous Waste Part A Permit Application; a respondent may submit a copy of a previously reported Site Identification Form and note any changes; this verifies and updates the site identification information.

The hazardous waste generation information is collected on Form GM; the hazardous waste management information for on-site is collected on Form GM and for waste from off site is collected on Form WR. The respondent submits the information for the specific reporting year.

#### **3(b) Public Notice**

EPA published a notice in the *Federal Register* for this data collection on April 17, 2007 (72 FR 19194). The public comment period extended through June 18, 2007. EPA received one comment on this ICR in response to the *Federal Register* notice.

The Occidental Chemical Corporation (OCC) submitted comments on June 22, 2007. The commenter had identified two specific concerns for this ICR. The first concern was that the GM form (Form 8700-13A) does not have a section that requires the name of each transporter used during the reporting year for shipments, even though the regulations at 40 CFR 262.41(a) (4) say that this information is required. Initially, Form 8700-13A did have space for the name of each transporter; however, EPA subsequently determined that the EPA identification number of each transporter would suffice.

OCC's second concern was that Form 8700-13A does not have space for the DOT hazard class of each waste, even though the regulations at 40 CFR 262.41(a)(5) say that this information is required. Again, Form 8700-13A used to ask for this information; however, EPA determined that since the DOT hazard class is required on the Manifest form, it was unnecessary to ask for it in the Biennial Report. With this and any ICR, EPA has to balance the need to collect the information with the requirements of the Paperwork Reduction Act, which mandates the Federal Government to reduce burden wherever possible.

#### **3(c) Consultations**

EPA consulted with generators, TSDF, and two States to obtain input on the assumptions used in this ICR. We consulted with the same two states and one respondent that supplied information for 2007 Hazardous Waste Report ICR; we contacted four additional respondents. We asked for information about how much effort it took to complete their 2007 Hazardous Waste Report (Biennial Report). The contacts and their responses are listed in Table 1 below.

EPA asked states:

1. How long did it take for you to complete your state's 2007 Biennial Report from the respondent reports and send the data files to EPA?
2. How many respondents submitted reports for your state?
3. How many GM forms were submitted? How many were submitted electronically?
4. How many WR forms were submitted? How many were submitted electronically?

EPA asked respondents:

1. How long did it take for you to fill out the 2007 Biennial Report?
2. How many GM forms did you fill out?
3. How many WR forms did you fill out?
4. Did you file your report electronically or on paper?

**Table 1**  
**Consultations with States and Respondents**

<b>State and Contact</b>	<b>Phone Number</b>	<b>Date of Contact</b>
Florida DEP - Jack Griffith	850-245-8748	4/12/07
Ohio EPA - Paula Canter	614-644-2923	4/12/07
<b>Respondent and Contact</b>	<b>Phone Number</b>	<b>Date of Contact</b>
CRS Corp. (generator) - Edward Underfinger	850-302-3599	4/5/07
Solutia Inc. (generator) - Amy Dyer	850-968-8257	4/5/07
PPG Chemicals (treater) - Maura LaGreca	740-420-6612	4/5/07
Innovene Corp. (generator) - Joe Bianco	419-226-1351	4/5/07



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

The two-year cycle is statutorily required. Though some States collect information on an annual or quarterly basis, EPA does not require more frequent data collection.

### **3(e) General Guidelines**

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, and OMB's Information Collection Review Handbook. This information collection complies with EPA's Data Standards and Information Quality Guidelines.

### **3(f) Confidentiality**

The 2007 Biennial Report requires businesses to provide information on various aspects of hazardous waste generation and management. Some businesses consider some of their hazardous waste information to be Confidential Business Information (CBI). A business may, if it desires, protect its Biennial Report information from public disclosure by asserting a claim of confidentiality covering all or part of its information. When a claim is made EPA will treat the information in accordance with the confidentiality regulations in 40 CFR part 2, subpart B. EPA also ensures that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

### **3(g) Sensitive Questions**

There are no sensitive questions asked in the 2007 Hazardous Waste Report.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents and NAICS Codes**

Beginning with the 2001 Hazardous Waste Report, respondents are required to report their business activities using the North American Industry Classification System (NAICS) codes. Based on prior reported data, the respondents are represented by the NAICS codes listed below.

<u>NAICS Code Description</u>	<u>NAICS Code</u>
Agriculture, Forestry, Fishing and Hunting	11
Mining	21
Utilities	22
Construction	23
Manufacturing	31-33
Wholesale Trade	42
Retail Trade	44-45
Transportation and Warehousing	48-49
Information	51
Waste Mgt and Remediation Services	562
Public Administration	92

#### **4(b) Information Requested**

The Hazardous Waste Report consists of four forms: RCRA Subtitle Site Identification Form, Waste Generation and Management (Form GM), Waste Received from Off-Site (Form WR), and Off-Site Identification (Form OI; used only by states). Only Large Quantity Generators and Treatment, Storage, and Disposal Facilities are required to complete the Hazardous Waste Report.

(i) Data Items:

- ***RCRA Subtitle C Site Identification Form.*** The Site Identification Form must be submitted by all sites required to file the 2007 Hazardous Waste Report. This form collects information such as site name, EPA Identification Number, address, contact, and type of hazardous waste generation and management activities taking place at the site; it verifies their information, especially the site's generator status as the date of submission of the report in 2008. It requires a certification signature for the submission of the report.
- ***Form GM - Waste Generation and Management.*** Form GM must be submitted by all respondents that generated or shipped large quantity generator amounts of RCRA hazardous waste during 2007. This form collects information on each generated waste, including a narrative waste description, a waste characterization

(waste codes, source, and form), quantity generated, and the method of waste management (whether managed on site or shipped off site).

- **Form WR - Waste Received From Off-Site.** Form WR must be submitted by all sites that received RCRA hazardous waste from off-site during 2007. This form collects information on each waste received from off-site, including a narrative description of the waste, a brief waste characterization (e.g., waste codes), the EPA Identification Number of the off-site generator, the quantity of waste received, and the method of waste management.
- **Form OI - Off-Site Identification.** Form OI is not required by EPA; rather, it is provided as an option for States to collect the names and addresses of transporters, generators that ship waste, and receivers of waste reported on Forms GM and WR where only the EPA Identification Number is listed.

(ii) Respondent Activities:

Respondents must perform the following activities:

- Read the 2007 Biennial Report instructions;
- Gather information and complete Site Identification Form;
- Gather information and complete Form GM;
- Gather information and complete Form WR;
- Gather information and complete Form OI if required by the State (State-optional form, not a Federal form);
- Submit the report to the State (or EPA Regional Office for some states and territories); and
- Maintain a copy of each form for three years.

## 5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

### 5(a) Agency Activities

As with most of the RCRA program, the Biennial Report data collection process is delegated to the States. Briefly, the process is as follows.

States (or EPA Regions where the Region implements the RCRA hazardous waste program for a State) provide respondents with either the Federal form or a State equivalent, collect the responses, contact non-respondents, enter the data (or load files if the State employs electronic methods for preparation and submittal of reports by regulated entities) into a database using off-the-shelf software packages which have been developed to support the collection of Biennial Report data, assure data quality, and forward the data to EPA.

States have discretion on the methods used to identify entities to whom they distribute

forms and the subsequent tracking of reports received. Most States generate mailing lists based on previous report submittals, augmented by recent notifications of regulated activity. Many States levy fees based on the nature and extent of regulated activity identified in the report. EPA makes all reported data (except any that may be claimed as CBI) available to the public on the Internet. This provides further incentive for sites (and also for States and EPA) to ensure the information is complete and accurate because the public regularly accesses this information.

The Regions support States in data gathering and data quality assessment. Regions may also provide technical support to States for the transfer of their files to EPA for incorporation into the national database. All files are submitted to the Agency through EPA's Central Data Exchange.

EPA Headquarters produces and distributes the Federal forms and related guidance, defines the data and file format for data, establishes the schedule for submitting data, manages the incorporation of State data into the national database, coordinates national data quality review, maintains the national database, and prepares a national report listing major facts about the national picture of hazardous waste generation and management for the reporting year.

In practice, this distribution of activities does not always follow this path. In some cases, the Region performs all of the State roles. In others, the Region provides direct processing support for some, but not all, of the collection activities. In still other cases, the Regions provide additional resources to the States.

EPA activities for the 2007 Biennial Report include the following:

- Develop 2007 Biennial Report forms and instructions. Print paper and CD copies.
- Distribute Biennial Report forms and instructions. EPA Headquarters distributes the form and instruction booklets to the States and Regions. States (or Regions) prepare mailing lists, mail forms and instructions, record receipt of completed forms, and contact sites that fail to respond within the specified time period. Some States may pre-populate Site Identification Forms prior to distribution to reduce the effort needed by respondents as well as to ensure accuracy.
- Develop computer capabilities required to compile national data. EPA Headquarters develops the computer capabilities required to load data into the national database, the reports which support data quality assessment and other programmatic use of the data, and preparation of the national report.
- Assist respondents. States, Regions, and Headquarters provide assistance to respondents. States are, however, the first point of contact for answering respondent questions and assistance.
- Enter report submissions. States or EPA Regions, and the regulated entities, key

enter or electronically load the data into a database they select and maintain. The data entry function was privatized for the 1999 Hazardous Waste Report process. Many States, Regions, and the regulated community use one of the private vendor's software packages for data entry and recordkeeping. Some reports are entered directly on state or vendor hosted Internet sites and some are submitted on diskettes.

- Perform quality assurance. States, Regions, and Headquarters all perform data quality assurance. This includes: follow-up to non-respondents, detection and correction of unacceptable responses (e.g., in cases where the respondent misunderstood the instructions); verification of exceptional responses (e.g., data reported by a respondent that differ significantly from data reported by the rest of the respondent universe) and identification of significant response changes between reporting years. The national software supports these activities with a variety of data editing functions.

Once reports are received, the QA/QC procedures include a hierarchy of assessments. First, system procedures ensure the data has fundamental internal consistency (e.g., required data fields are populated and the values are of the correct data type and within allowed ranges).

Second, the information content of the data for individual sites is evaluated to identify any potential over or under reporting (exception reports support identification of extremes and significant variance from one cycle to another).

Third, assessment reports support evaluation of intra-State and inter-State shipments of wastes to identify potential discrepancies between reports submitted by generators and the TSDF's who were identified by the generator as receivers of the waste.

Based on the assessments, States identify cases where accuracy may be questionable. For those cases, they generally contact the site to review the information received; and site respondent confirms that the data are correct or that the site intends to submit an amended report to correct discrepancies.

- Prepare the national report. EPA will prepare *The National Biennial RCRA Hazardous Waste Report (Based on 2007 Data)* that will be made available to the Congress and the public.
- Store the data. The 2007 Biennial Reports will be stored by the States or Regions for three years and an electronic database may be maintained by each State or Region. The national database is maintained by EPA Headquarters in RCRAInfo.

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

To ensure that the Biennial Report data collected are accurate, complete, and retrievable, EPA has employed a variety of user support, automatic data processing, and process management techniques.

**User Support.** EPA publishes the list of State and EPA Regional contacts on the Agency's publicly available Internet. This list refers respondents to a State or EPA Regional contact for assistance with their report.

**Automatic Data Processing.** The Biennial Report data collection effort is delegated to the States and is therefore decentralized. EPA has developed procedures to support:

- acceptance of the data in a standard electronic format;
- quality assurance of the data;
- storage of national data; and
- use of the data.

EPA developed documentation necessary to produce submissions according to EPA's electronic reporting standards for the Central Data Exchange. The standards used for respondents to submit electronically will depend on which software package the State or Region uses.

EPA provides reports to support the national data quality assessment process. The reports highlight outlying data values (e.g., data reported by one or more respondents that differ significantly from data reported by the rest of the respondent universe), significant changes from one report cycle to another for a facility, and significant differences between waste reported as shipped by one facility and the corresponding waste reported as received by the receiving facility. EPA also provides reports to support the loading of files into RCRAInfo. These reports facilitate the identification and resolution of incorrect or incomplete data or file formats.

To protect the data from unauthorized alteration, EPA implements security controls on the national database which limit file loading and update privileges to authorized database administrators, and prevents anything other than read access on the part of State and EPA users. Because of information security procedures, EPA does not allow direct public access to the RCRAInfo. On-line public access is supported by an extract of the data which is then made available through EPA's Internet-accessible Envirofacts database.

Any information claimed as CBI is submitted on diskettes by the State and kept separate from other data. For compilation of the national report, data is submitted to the OSW CBI office where it is logged by the same process used for other CBI documents. The information on quantities of waste claimed as CBI are tabulated to include in the quantity data for the national report without references that would allow derivation of the specific components of the original report or who sent it.

**Process Management.** To implement Biennial Report, EPA has established a data collection process, assigned responsibilities in the process, and established a schedule for the

implementation of the process.

States and U.S. territories (and EPA as the implementer of the program for Alaska, Iowa and the Virgin Islands) track and monitor initial responses from the regulated community. As implementation proceeds, headquarters staff communicate with Regions and their States to confirm progress and identify emerging problems (e.g. significant delays on the part of a given State). Periodic status reports are sent by EPA Headquarters staff to EPA Regional and State management and staff outlining progress towards meeting milestones.

In addition to routine status updates for management, Headquarters staff use the information obtained from their regular discussions with States and Regions to identify cases which may require senior management action. Where necessary, senior Headquarters managers consult with their counterparts in the Regions to review problem areas and determine approaches to overcoming them.

### **(5c) Small Entity Flexibility**

EPA uses the quantity of waste generated per month to determine the extent to which a firm should be regulated. EPA categorizes generators of less than 1,000 kilograms of non-acute hazardous waste per month as small quantity generators (SQGs) and relieves them of specific requirements.

SQGs are not required to file the 2007 Biennial Report. A SQG who is sent the 2007 Biennial Report due to a change in generator status or error need not respond. They must return a completed RCRA Subtitle C Site Identification Form to update their generator status to ensure they are not subject to follow-up contact for biennial reporting.

## 5(d) Collection Schedule

EPA's 2007 Biennial Report implementation schedule is outlined Table 2 below.

**Table 2**  
**Reporting and Implementation Schedule**

<b>Activity</b>	<b>Lead</b>	<b>Start Date</b>	<b>End Date</b>
Print 2007 Booklets	EPA HQ		November 2007
Distribute 2007 Booklets to States	EPA HQ	November 2007	December 2007
Upload data from the 2007 Hazardous Waste Report	States and EPA Regions	April 2008	June 2008
Preliminary 2007 National Biennial Report posted on internet	EPA HQ	June 2008	July 2008
Data quality review of uploaded data	EPA HQ	July 2008	September 2008
Deadline for upload of final, corrected data	States and EPA Regions		September 15, 2008
Publish 2007 National Biennial RCRA Hazardous Waste Report and Data Files on Internet	EPA HQ		December 2008

## 6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

### 6(a) Estimating Respondent Burden

EPA presents estimates for the respondent burden hours associated with the information collection requirements covered in this ICR in Exhibits 1a and 1b. These exhibits list all of the respondent activities associated with the 2007 Hazardous Waste Report and present burden and cost estimates for each. The burden estimates are broken down by labor category (legal, managerial, technical, and clerical) and totaled on a per activity basis. These burden estimates are then multiplied by the estimated number of respondents and the estimated number of activities per respondent to obtain an estimate of the overall burden to the regulated universe for each activity.

### Source of Burden Estimates



The burden estimates for each activity are based on the estimates contained in the previous version of this ICR and have been validated through consultation with States and members of the regulated community (see Section 3(c)).

### **Methodology for Accounting for Site Identification Forms Pre-Populated by States**

In estimating the hourly burden for preparing the Site Identification Form, EPA assumed that 65 percent of all the Site Identification Forms would be pre-populated by States prior to distribution to respondents or by vendor software used by the respondents. EPA estimates the average hourly burden for updating the pre-populated Site Identification Form to be 0.4 hours per respondent, and for completing the Site Identification Form in its entirety, 0.7 hours per respondent.

To estimate the average burden per respondent in preparing a Site Identification Form, EPA used the weighted-average calculation shown in Table 3 below. EPA multiplied the percentage of pre-populated Site Identification Forms by the average burden for updating the information contained in the form and blank forms by the average burden for completing the blank form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 3**  
**Assumptions and Weighted-Average Equation**  
**Used in Estimating Burden to Complete the Site Identification Form**

Assumptions	Weighted-Average Equation
0.4 hours to complete pre-populated form; 65 percent of the forms are pre-populated	$(0.4 \text{ hrs} \times 0.65) + (0.7 \text{ hrs} \times 0.35)$ $= 0.5 \text{ hours}$
0.7 hours to complete blank form; 35 percent of the forms are blank	

### **Methodology for Accounting for Electronic Reporting**

For the 2007 Biennial Report, EPA held consultations with a few State and facility representatives to get feedback on the ICR's data and assumptions. In these conversations, the representatives indicated that GM and WR Forms often can be completed from databases that track manifests or other information for billing purposes. Based on these and previous years' consultations, EPA estimated the hourly burden for the GM and WR Forms submitted electronically to be significantly less than for forms submitted on paper.

To estimate the percentage of facilities that submit GM and WR Forms electronically, EPA used information gained from the consultations and 2005 Biennial Report (BR) data. For GM submissions, EPA estimated that, based on consultations and best professional judgment,

facilities submitting five (5) or more GM Forms for the Biennial Report are likely to do so electronically. Using 2005 BR data, EPA identified sites submitting GM Forms, counted their GM Forms submitted, and calculated the percentage that their GM Forms represented of the total number of GM Forms. Based on this methodology, EPA estimates that 85 percent of GM Forms are submitted electronically, while the remaining 15 percent are sent manually. EPA found that over 75 percent of respondents submit 10 or fewer GM Forms.

For WR Forms, EPA believes that TSDFs receiving large numbers of off-site shipments are more likely to have systems in place to track waste stream data, and as a consequence, to report Biennial Report data electronically. Using the 2005 BR data, EPA reviewed the list of WR Forms reported to the Biennial Report by facility and, based on its own professional judgment and consultations, estimates that 100 percent of WR Forms are submitted electronically. EPA found that over 45 percent of respondents submit 100 or fewer WR Forms.

To estimate the average burden per respondent in preparing a Form GM or WR, EPA used the weighted-average calculations shown in Table 4. EPA multiplied the percentage of both forms submitted electronically by their respective burden for electronic reporting and the percentage of both forms submitted manually by their respective burden for manual reporting. Then, EPA added the two products for each form respectively to calculate an overall weighted-average burden for both forms.

**Table 4**  
**Assumptions and Weighted-Average Equations**  
**Used in Estimating Burden to Complete the GM and WR Forms**

Activity	Assumptions	Weighted-Average Equation
Complete GM Form	1.26 hours to complete manually; 15% of the forms are completed manually  0.08 hours to complete electronically; 85% of the forms are completed electronically	$(1.26 \text{ hrs} \times 0.15) + (0.08 \text{ hrs} \times 0.85)$ $= 0.28 \text{ hours}$
Complete WR Form	0.13 hours to complete electronically; 100% of the forms are completed electronically	$0.13 \text{ hrs} \times 1 = 0.13 \text{ hours}$

## **6(b) Estimating Respondent Costs**

### **Estimating Labor Costs**

EPA estimates respondent costs for all activities covered in this ICR in Exhibits 1a and 1b. Exhibit 1a represents the privately-owned facilities, Exhibit 1b represents State-owned facilities.

For purposes of this analysis, EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$81.13 for legal staff, \$65.61 for managerial staff, \$36.34 for technical staff, and \$17.99 for clerical staff. These respondent labor costs were generated from data obtained from the US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 National Occupational Employment and Wage Estimates (averages across all NAICS codes): [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm).

Loaded wage rates estimated by multiplying the BLS unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., Federal government civilian wage full fringe benefit cost factor of 36.45%, plus 12% overhead cost factors) from Figure C1 of the 29 May 2003 OMB Circular A-76: Performance of Commercial Activities: [http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html).

For the State respondent labor rates, EPA estimates an average hourly labor cost (including fringe and overhead) of \$55.65 for legal staff, \$52.24 for managerial staff, \$31.26 for technical staff, and \$19.94 for clerical staff. These State respondent labor costs were generated from data obtained from the US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 at: [http://www.bls.gov/oes/current/naics4\\_999200.htm](http://www.bls.gov/oes/current/naics4_999200.htm) OMB does not publish a state government wage rate loading cost factor; thus the same OMB cost factor for Federal government labor is applied in this table above. The loaded wage rates above were calculated by multiplying the BLS unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., civilian position full fringe benefit cost factor of 36.45%, plus 12% overhead cost factor) from Figure C1 of OMB Circular A-76 to be used to reflect the full cost of government employees: [http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html).

### **Estimating Capital and O&M Costs**

To submit the Biennial Report, EPA estimates that facilities will incur a one-time postage cost of \$2.00 each year for the two-year period of the ICR. This estimate is based on the mailing cost of \$4.00 for a certified mail package.

EPA estimates that facilities will incur annual operation and maintenance (O&M) costs associated with maintaining a copy of each form for three years. For respondents that submit paper versions of the forms, EPA estimates that to maintain files, facilities will purchase file cabinets and make photocopies. For respondents that submit the information electronically, EPA estimates that to maintain files, facilities will purchase disk storage space (e.g., floppy disks).

EPA estimates that file storage, whether paper or electronic, will cost \$0.01 per form and that photocopying charges will cost \$0.11 per form submitted for the two-year period of the ICR. As with burden hours, the costs for electronic reporting are incorporated into the cost estimates for the GM and WR Forms by multiplying the proportion electronically reporting by the O&M cost for electronic reporting (\$0.01) plus the proportion using manual reporting multiplied by the O&M costs for respondents that submit the paper forms (\$0.01+\$0.11).

### **6(c) Estimating Federal Agency Burden and Cost**

EPA estimates the Federal Agency hour and cost burden associated with all information collection requirements covered in this ICR in Exhibit 2. EPA is responsible for developing the forms, developing computer capabilities required to compile national data, storing the data, and preparing the National Report and other analyses. EPA is also responsible for distributing the forms to the States, as well as collecting and entering the data in Alaska, Iowa, and the Virgin Islands.

As shown in the exhibit, EPA estimates an average hourly labor cost of \$83.28 for legal staff, \$70.01 for managerial staff, \$29.42 for technical staff, and \$23.50 for clerical staff.

To derive these hourly estimates, EPA referred to the US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 at:  
[http://www.bls.gov/oes/current/naics4\\_999100.htm](http://www.bls.gov/oes/current/naics4_999100.htm)

The loaded wage rates above were calculated by multiplying the BLS unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., civilian position full fringe benefit cost factor of 36.45%, plus 12% overhead cost factor) from Figure C1 of OMB Circular A-76 to be used to reflect the full cost of government employees:  
[http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html).

As shown in Exhibit 2, depending on the type of Agency activity, some of the total burden per Agency activity is based on the number of respondents or the number of forms. Burden hours for entering report submissions for each labor category account for electronic reporting; burden for key entry is multiplied by the proportion of total forms submitted on paper and added to the burden for electronically loading the data (estimated to be one-tenth the burden for key entry) multiplied by the proportion of forms expected to be submitted electronically (see Section 6(a)).

### **6(d) Estimating State Agency Burden and Cost**

EPA estimates the State Agency hour and cost burden associated with all information collection requirements covered in this ICR in Exhibit 3. All U.S. States and Territories, with the exception of Alaska, Iowa, and the Virgin Islands, are responsible for distributing the forms to respondents, assisting respondents with any questions, collecting completed forms and entering the data, as well as quality assurance of the data.

As shown in the exhibit, EPA estimates an average hourly labor cost of \$55.65 for legal staff, \$52.24 for managerial staff, \$31.26 for technical staff, and \$19.94 for clerical staff.

These State government employee unloaded average (mean) wage rates were generated from the US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 at: [http://www.bls.gov/oes/current/naics4\\_999200.htm](http://www.bls.gov/oes/current/naics4_999200.htm).

OMB does not publish a state government wage rate loading cost factor; thus the same OMB cost factor for Federal government labor is applied in this table above. The loaded wage rates above were calculated by multiplying the BLS unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., civilian position full fringe benefit cost factor of 36.45%, plus 12% overhead cost factor) from Figure C1 of OMB Circular A-76 to be used to reflect the full cost of government employees:  
[http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html).

### 6(e) Estimating the Respondent Universe and Total Burden and Cost

EPA estimates that the total number of respondents to the 2007 Biennial Report will be approximately 25,238, which annualized over the two-year report cycle equals 12,619 per year (25,238/2). See Table 5 for the Respondent Universe breakdown.

**Table 5  
Respondent Universe**

<b>Respondent Type</b>	<b>Number of Respondents</b>	<b>Number of Site ID Forms</b>	<b>Number of GM Forms</b>	<b>Number of WR Forms</b>
Privately-owned facilities	23,686	23,686	250,560	851,380
State-owned facilities	1,370	1,370	4,100	160
<b>Total</b>	<b>25,238</b>	<b>25,238</b>	<b>254,660</b>	<b>851,540</b>

The number of respondents and forms for each respondent activity is presented below. These estimates assume that all questions and forms are submitted in accordance with the Biennial Report instructions. Exhibits 1a and 1b calculate the annual respondent burden and cost for the activities examined.

### Read the Instructions

EPA estimates that all 25,238 respondents will read the instructions to the 2007 Biennial Report. Annualized over the two-year report cycle, this results in 12,619 facilities reading the instructions each year.

### **Gather Information and Complete Site Identification Form**

EPA estimates that all 25,238 respondents will complete and submit a Site Identification Form with the 2007 Biennial Report. Annualized over the two-year report cycle, this results in 12,619 respondents preparing and submitting a Site Identification Form each year. EPA further assumes that 65 percent of forms will be pre-populated by States, in which case respondents need only review and update the data. Respondents receiving blank forms will need to complete the form. EPA estimates that, on average, a pre-populated Site Identification Form will take about 0.4 hours to update and a blank Site Identification Form will take about 0.7 hours to complete. Thus, on average, EPA assumes each respondent will take about 0.5 hours (weighted-average) to update/complete a Site Identification Form. See Table 3 above.

### **Gather Information and Complete Form GM**

EPA anticipates that each year 12,619 respondents will submit 127,330 GM Forms to EPA (254,660/2). EPA estimates that, on average, a Form GM will take about 1.26 hours to complete manually and 0.08 hours to complete electronically. EPA further assumes that 15 percent of forms will be completed manually and 85 percent will be completed electronically. Thus, on average, EPA assumes each respondent will take about 0.28 hours (weighted-average) to complete each Form GM. See Table 4 above.

### **Gather Information and Complete Form WR**

EPA expects that each year 12,619 respondents will each submit a total of 425,770 WR Forms to EPA (851,540/2). Note that the number of WR Forms represents the number of blocks on Form WR that have been completed; the paper form actually contains three blocks of the same WR information (i.e., the same questions, repeated three times on the same page). EPA estimates that a Form WR will take, on average, about 0.13 hours to complete electronically. EPA further assumes that 100 percent of forms will be completed electronically. Thus, on average, EPA assumes each respondent will take about 0.13 hours (weighted-average) to complete each Form WR. See Table 4 above.

### **Gather Information and Complete Form OI**

Because this form is a State-optional form, EPA does not expect any facilities to submit Form OI and therefore does not calculate the burden for this form.

### **Submit the Biennial Report to State/Region**

EPA expects each respondent, 12,619 facilities per year, to submit the report to the appropriate State or Region.

### **Maintain a Copy of Each Form**

EPA expects facilities to retain an estimated 565,719 (12,619 + 127,330 + 425,770)

forms each year.

### **Bottom Line Burden and Cost for Respondents**

Table 6 presents the bottom line respondent burden and costs associated with the 2007 Hazardous Waste Report. EPA estimates that respondents will incur an annual burden of 267,974 hours and a cost of \$9,113,628. These tallies come from Exhibits 1a and 1b.

**Table 6  
Total Respondent Hour and Cost Burden**

	<b>Annual Hour Burden</b>	<b>Annual Labor Cost</b>	<b>Annual Capital/Start-up Cost</b>	<b>Annual O&amp;M Cost</b>	<b>Total Annual Cost</b>
<b>Privately-Owned</b>	265,032	\$8,960,807	\$0	\$46,145	\$9,006,952
<b>State-Owned</b>	2,942	\$105,108	\$0	\$1,568	\$106,676
<b>Total</b>	<b>267,974</b>	<b>\$9,065,915</b>	<b>\$0</b>	<b>\$47,713</b>	<b>\$9,113,628</b>

### **Bottom Line Burden and Cost for Federal and State Agencies**

EPA estimates the annual Federal Agency burden for the 2007 Hazardous Waste Report will be 823 hours and a total cost of \$379,277 (\$24,127 for labor + \$355,150 for capital/start-up and O&M costs). These totals come from Exhibit 2.

EPA estimates the annual State Agency burden for the 2007 Hazardous Waste Report will be 417,222 hours and a total cost of \$11,023,863 (\$11,004,934 for labor + \$18,929 for capital/start-up and O&M costs). These totals come from Exhibit 3.

### **6(f) Reasons For Change In Burden**

The annual hour burden estimate for the 2005 Hazardous Waste Report was 165,252 hours, with a total cost of \$29,597 for capital/start-up and O&M. The annual hour burden estimate for the 2007 Hazardous Waste Report is 685,196 hours (267,974 for respondents + 417,222 for State Agencies) with a total cost of \$66,642 (\$47,713 + \$18,929) for capital/start-up and O&M. This represents an increase of 519,944 hours and \$37,045 total cost for capital/start-up and O&M.

This increase in burden for private facilities has occurred for two reasons. First, there is an increase in the number of respondents, from 9,106 in 2005 to 12,619 projected for 2007. Second, there is a projected increase in burden due to the change in block 10.B. of the Site ID form (see section 1(b) above).

The increase in state burden is due to the fact that EPA is counting the State Agency burden in the overall burden for this ICR for the first time with this renewal. Historically, EPA

calculated State Agency burden with the Federal Agency burden, so the State Agency burden was not reflected in the bottom line burden for the ICR.

### **6(g) Burden Statement**

The reporting burden is estimated to average 16.4 hours per respondent, and includes time for reviewing instructions, gathering data, completing and reviewing the forms, and submitting the report. The record keeping requirement is estimated to average 2.3 hours per response and includes the time for filing and storing the Biennial Report submission for three years.

Burden means the total time, effort, and 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 EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.



**EXHIBIT 1a**  
**THE 2007 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg. \$81.13/ Hour	Mgr. \$65.61/ Hour	Tech. \$36.34/ Hour	Cler. \$17.99/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Read the 2005 Hazardous Waste Report instructions	0.00	1.00	1.00	0.00	2.00	\$101.95	\$0.00	\$0.00	11,934	23,868	\$1,216,671
Gather information and prepare Site Identification Form	0.00	0.04	0.14	0.05	0.23	\$8.39	\$0.00	\$0.00	11,934	2,739	\$100,126
Gather information and prepare Form GM	0.00	0.03	0.22	0.04	0.29	\$10.76	\$0.00	\$0.00	250,560	73,164	\$2,696,026
Gather information and prepare Form WR	0.00	0.00	0.12	0.04	0.16	\$5.08	\$0.00	\$0.00	851,380	136,221	\$4,325,010
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	-	\$0
Submit report to the State or Regional EPA Office	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	\$2.00	11,934	1,193	\$45,349
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$0.54	\$0.00	\$0.02	1,113,874	27,847	\$623,769
<b>TOTAL</b>	Varies	Varies	Varies	Varies	Varies	\$8,960,807	\$0.00	\$46,145	Varies	265,032	\$9,006,952

**EXHIBIT 1b**  
**THE 2007 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL STATE RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg. \$55.65/ Hour	Mgr. \$52.24/ Hour	Tech. \$31.26/ Hour	Cler. \$19.94/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Read the 2005 Hazardous Waste Report instructions	0.00	1.00	1.00	0.00	2.00	\$83.50	\$0.00	\$0.00	685	1,370	\$57,198
Gather information and prepare Site Identification Form	0.00	0.04	0.14	0.05	0.23	\$7.31	\$0.00	\$0.00	685	157	\$5,007
Gather information and prepare Form GM	0.00	0.03	0.22	0.04	0.29	\$9.30	\$0.00	\$0.00	4,099	1,197	\$38,121
Gather information and prepare Form WR	0.00	0.00	0.12	0.04	0.16	\$4.55	\$0.00	\$0.00	159	25	\$723
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	-	\$0
Submit report to the State or Regional EPA Office	0.00	0.00	0.00	0.10	0.10	\$1.99	\$0.00	\$2.00	685	69	\$2,733
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$0.56	\$0.00	\$0.04	4,943	124	\$2,966
<b>TOTAL</b>	Varies	Varies	Varies	Varies	Varies	\$105,108	\$0.00	\$1,568	Varies	2,942	\$106,676

**EXHIBIT 2**  
**THE 2007 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL FEDERAL AGENCY BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg. \$83.28/ Hour	Mgr. \$70.01/ Hour	Tech. \$29.42/ Hour	Cler. \$23.50/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Develop 2007 Report forms and instructions	0.00	8.00	80.00	20.00	108.00	\$3,383.68	\$0.00	\$20,000.00	1	108	\$23,384
Distribute and collect Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$19.81	\$0.00	\$1.50	100	76	\$2,131
Develop computer capabilities required to compile national data	0.00	8.00	80.00	0.00	88.00	\$2,913.68	\$0.00	\$250,000.00	1	88	\$252,914
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$27.16	\$0.00	\$0.00	100	101	\$2,716
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$8.93	\$0.00	\$0.00	58	20	\$518
Quality assurance	0.00	0.02	0.16	0.16	0.34	\$9.59	\$0.00	\$0.00	300	102	\$2,877
Prepare the National Report and other Analyses	0.00	8.00	200.00	40.00	248.00	\$7,384.08	\$0.00	\$50,000.00	1	248	\$57,384
Store the data	0.00	0.00	80.00	0.00	80.00	\$2,353.60	\$0.00	\$35,000.00	1	80	\$37,354
<b>TOTAL</b>	Varies	Varies	Varies	Varies	Varies	\$24,127	\$0.00	\$355,150	Varies	823	\$379,277

**EXHIBIT 3**  
**THE 2007 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL STATE AGENCY BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg. \$55.65/ Hour	Mgr. \$52.24/ Hour	Tech. \$31.26/ Hour	Cler. \$19.94/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Distribute and collect Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$18.31	\$0.00	\$1.50	12,619	9,590	\$249,982
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$26.12	\$0.00	\$0.00	12,619	12,745	\$329,608
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$8.01	\$0.00	\$0.00	42,616	14,489	\$341,354
Quality assurance	0.00	0.02	0.16	0.16	0.34	\$9.03	\$0.00	\$0.00	1,118,817	380,398	\$10,102,918
<b>TOTAL</b>	Varies	Varies	Varies	Varies	Varies	\$11,004,934	\$0.00	\$18,929	Varies	417,222	\$11,023,863