

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 0976.14
“NOTIFICATION OF REGULATED WASTE ACTIVITY
AND 2009 HAZARDOUS WASTE REPORT”**

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Office of Resource Conservation and Recovery
United States Environmental Protection Agency
Washington, D.C. 20460

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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 “Notification of Regulated Waste Activity and 2009 Hazardous Waste Report,” EPA ICR Number 0976.14.

1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

This is a request to renew two currently approved ICRs of the U.S. Environmental Protection Agency (EPA):

- **“Notification of Regulated Waste Activity,” EPA ICR Number 0261.15 (OMB Control Number 2050-0028).** The Notification ICR addresses the notification requirements under Section 3010 of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. RCRA Section 3010 requires any person who generates, transports, or recycles regulated wastes or who owns or operates a facility for the treatment, storage, or disposal of regulated wastes to notify EPA of their activities, including the location and general description of the activities and the regulated wastes handled. As required by statute, EPA promulgated regulations to implement these notification requirements at 40 CFR Parts 262, 263, 264, 265, 266, 270, 273, and 279.
- **“2007 Hazardous Waste Report,” EPA ICR Number 0976.13 (OMB Control Number 2060-0024).** The Hazardous Waste Report ICR addresses the requirements of Sections 3002 and 3004 of RCRA, as amended, which require reporting to EPA or to authorized States at least every two years. The Hazardous Waste Report [EPA Form 8700-13 Form A/B], or comparable State report, is used by generators and treatment, storage, and disposal facilities (TSDFs) to satisfy this requirement.

EPA integrated the above two ICRs into this current ICR, EPA ICR Number 0976.14, to ensure consistency and minimize duplication in its burden assumptions and estimates, since both ICRs address some of the same reporting elements under their respective requirements. In particular, both ICRs address the use of the RCRA Subtitle C Site Identification Form (i.e., the Site ID Form). Specifically, the Notification ICR addresses the requirements for all regulated entities to submit the Site ID Form (or alternative document, if specified) to notify EPA or the authorized State. The Hazardous Waste Report ICR addresses the requirements for large quantity generators (LQGs)¹ and TSDFs to prepare and submit the Site ID Form as part of their Hazardous Waste Report. Incorporating these two ICRs into this current ICR has allowed EPA to more comprehensively estimate the burden of the Site ID Form and other collections, ensure consistency and nonduplication in its analysis, and address recent changes to the Site ID Form.

¹ An LQG is a facility that generates 1,000 kilograms (2,200 pounds) or more of hazardous waste in any single calendar month, or more than 1 kilogram (2.2 pounds) of acute hazardous waste in any single calendar month, or more than 100 kilograms (220 pounds) of acute hazardous waste spill clean-up material in any single calendar month.

In addition, EPA integrated into this current ICR two additional reporting requirements related to the Site ID Form:

- The requirement at 40 CFR 260.42 that provides that hazardous secondary material generators, tolling contractors, toll manufacturers, reclaimers, and intermediate facilities managing hazardous secondary materials that are excluded from regulation under section 261.2(a)(2)(ii) or section 261.4(a)(23), (24), or (25) must comply with specified notification requirements. This requirement is currently addressed in “Revisions to the RCRA Definition of Solid Waste,” EPA ICR Number 2310.01 (OMB Control Number 2050-0202).
- The requirements at 40 CFR 262.203 and 262.204 that provide the option to comply with an alternative set of generator requirements applicable to laboratories to eligible academic entities, teaching hospitals that are not owned by a college or university, and non-profit research institutes that are not owned or operated by a college or university. In order to comply with these alternative standards, facilities must comply with specified notification requirements. These requirements are currently addressed in “Generator Standards Applicable to Laboratories Owned by Eligible Academic Entities,” EPA ICR Number 2317.01 (2050-0204).

Sections 1 through 5 of this document describe the information collection requirements covered in this ICR (e.g., in regard to need and use of the information collected). Section 6 estimates the annual hour and cost burden to respondents and the Agency under these requirements.

The following paragraphs briefly summarize the information collection requirements covered in this ICR.

(1) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

40 CFR 260.42(a) provides that hazardous secondary material generators, tolling contractors, toll manufacturers, reclaimers, and intermediate facilities managing hazardous secondary materials which are excluded from regulation under section 261.2(a)(2)(ii) or section 261.4(a)(23), (24), or (25) must send a notification prior to operating under the exclusion(s) and by March 1 of each even numbered year thereafter to the Regional Administrator using EPA Form 8700-12 (i.e., the Site ID Form) that includes the specified information at section 260.42(a)(1)-(10).

Section 260.42(b) provides that, if a hazardous secondary material generator, tolling contractor, toll manufacturer, reclaimer or intermediate facility has submitted a notification, but then subsequently stops managing hazardous secondary materials in accordance with the exclusion(s), the facility must notify the Regional Administrator within thirty (30) days using EPA Form 8700-12. For purposes of this section, a facility has stopped managing hazardous

secondary materials if the facility no longer generates, manages and/or reclaims hazardous secondary materials under the exclusion(s) and does not expect to manage any amount of hazardous secondary materials for at least one year.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

Facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste as defined by 40 CFR Part 261 must notify EPA of their hazardous waste activities and obtain an EPA Identification Number. All of these facilities are required to use EPA Form 8700-12 (i.e., the Site ID Form) to notify EPA of their hazardous waste activities. These notification requirements are codified at 40 CFR Parts 262, 263, 264, 265, 266, 270, and 273. The specific notification requirements for each of these parts are described below and listed in Table 1.

40 CFR Parts 262, 263, 264, and 265 include the notification requirements for generators, transporters, and owners or operators of permitted and interim status TSDFs, respectively. Sections 262.12, 263.11, 264.11, and 265.11 list the specific notification requirements. Persons regulated under these sections must obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste.

40 CFR Part 266, Subpart D includes notification requirements for generators and transporters; storers; and users of recyclable materials that are used in a manner that constitutes disposal. Specifically, sections 266.21, 266.22, and 266.23 subject generators and transporters of these materials; storers who are not the ultimate users; and users, respectively, to the notification requirement under RCRA Section 3010. In addition, these sections also subject these same generators and transporters; storers; and users to all of the applicable requirements of 40 CFR Parts 262 and 263; Parts 264 and 265, Subparts A through L; and Parts 264 and 265, respectively, that include the specific mechanics for implementing the notification requirements as described in sections 262.12, 263.11, 264.11, and 265.11.

40 CFR Part 266, Subpart F includes notification requirements for generators, transporters, and storers of recyclable materials that are utilized for precious metal recovery. Specifically, section 266.70(b)(1) subjects these facilities to the RCRA Section 3010 notification requirements.

40 CFR Part 266, Subpart G includes notification requirements for owners or operators of interim status and permitted TSDFs that store spent lead-acid batteries (other than spent lead-acid batteries that are regenerated) before reclaiming them. Specifically, section 266.80(b)(1)(i) requires interim status TSDFs that store these batteries before reclaiming them meet the notification requirements of RCRA Section 3010. In addition, section 266.80(b)(2)(i) requires permitted TSDFs that store these batteries before reclaiming them meet the notification requirements of RCRA Section 3010.

40 CFR Part 266, Subpart H includes notification requirements for facilities that burn or process hazardous waste in a boiler or industrial furnace (BIF). Subpart H also subjects generators, transporters, and storers (including processors, blenders, and distributors of hazardous waste fuel) of hazardous waste that is burned or processed in a BIF to the notification

requirements of 40 CFR Parts 262, 263, and 264 and 265, respectively. Specifically, sections 266.100(c)(1)(i) and 266.100(f)(1) require that owners or operators of smelting, melting, and refining furnaces that processes hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals, respectively, to provide a written, one-time notification of their hazardous waste activities. In addition, sections 266.101(a), 266.101(b), and 266.101(c) require that generators, transporters, and storers of hazardous waste that is burned or processed in a BIF follow specific notification requirements and procedures of sections 262.12, 263.11, and 264.11 and 265.11, respectively. Further, sections 266.102(a)(2)(ii) and 266.103(a)(4)(ii) subject owners or operators of permitted and interim status BIFs that burn or process hazardous waste, respectively, to 40 CFR Parts 264 and 265, Subpart B, which includes the section 264.11 and 265.11 notification requirements. Finally, section 266.108(d) requires that facilities that qualify for the small quantity on-site burner exemption to provide a written, one-time notification of their hazardous waste activities.

40 CFR Part 270 prescribes the timing for notification of hazardous waste activities due to the listing of a hazardous waste in 40 CFR Part 261. Specifically, section 270.1(b) requires that “not later than 90 days after the promulgation or revision of regulations in Part 261 (identifying and listing hazardous wastes), generators and transporters of hazardous waste, and owners or operators of hazardous waste treatment, storage, or disposal facilities may be required to file a notification of that activity under Section 3010.”

40 CFR Part 273, Subpart D describes certain conditions under which a transporter of universal waste may be subject to the Section 3010 notification requirements of RCRA. Specifically, section 273.54 makes transporters who determine that any material resulting from a release of universal waste is a hazardous waste subject to 40 CFR Part 262. As a result, section 273.54 may also make them, in certain circumstances, subject to the section 262.12 notification requirements and procedures.

40 CFR Part 273, Subpart E includes notification requirements for destination facilities of universal waste. Specifically, section 273.60(a) subjects owners or operators of destination facilities to the notification requirement under RCRA Section 3010. Section 273.60(a) also subjects destination facilities to all applicable requirements of 40 CFR Parts 264, 265, 266, 268, and 270, which include the section 264.11 and 265.11 notification requirements and procedures.

Table 1
Hazardous Waste Notification Requirements

40 CFR Regulatory Citation	Regulated Entity
§262.12	Hazardous Waste Generators
§263.11	Hazardous Waste Transporters
§264.11	Permitted Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDFs)
§265.11	Interim Status Hazardous Waste Treatment, Storage, and Disposal Facilities
§266.21	Generators and Transporters of Recyclable Materials Used in a Manner Constituting Disposal
§266.22	Storers of Recyclable Materials Used in a Manner Constituting Disposal
§266.23	Users of Recyclable Materials in a Manner Constituting Disposal
§266.70(b)(1)	Generators, Transporters, and Storers of Recyclable Materials Utilized for Precious Metal Recovery
§266.80(b)(1)(i)	Interim Status TSDFs Storing Spent Lead-Acid Batteries (other than Spent Batteries that are to be Regenerated) before Reclamation
§266.80(b)(2)(i)	Permitted TSDFs Storing Spent Lead-Acid Batteries (other than Spent Batteries that are to be Regenerated) before Reclamation
§266.100(c)(1)(i)	Smelting, Melting, and Refining Furnaces Processing Hazardous Waste Solely for Metal Recovery
§266.100(f)(1)	Smelting, Melting, and Refining Furnaces Processing Hazardous Waste for Recovery of Significant Amounts of Certain Precious Metals
§266.101(a)	Generators of Hazardous Waste Burned in Boilers or Industrial Furnaces
§266.101(b)	Transporters of Hazardous Waste Burned in Boilers or Industrial Furnaces
§266.101(c)	Storers of Hazardous Waste Burned in Boilers or Industrial Furnaces
§266.102(a)(2)(ii)	Permitted Boilers and Industrial Furnaces
§266.103(a)(4)(ii)	Interim Status Boilers and Industrial Furnaces
§266.108(d)	Burners of Small Quantities of Hazardous Waste in On-Site Boilers or Industrial Furnaces
§270.1(b)	Generators and Transporters of, and TSDFs Managing Newly Listed Hazardous Wastes
§273.54	Transporters of Universal Waste That is Released and Determined to be Hazardous Waste
§273.60(a)	Universal Waste Destination Facilities

(c) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

(c1) Intent to Comply with Subpart K and Recordkeeping of Agreements

40 CFR 262.203(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a conditionally exempt small quantity generator (CESQG) and does not have an EPA Identification Number must notify that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.203(b)(1)-(11).

Section 262.203(c) provides that an eligible academic entity must keep a copy of the notification on file at the eligible academic entity for as long as its laboratories are subject to Subpart K.

Section 262.203(d) provides that a teaching hospital that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the teaching hospital for as long as its laboratories are subject to Subpart K.

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the non-profit research institute for as long as its laboratories are subject to Subpart K.

(c2) Withdrawal from 40 CFR Part 262, Subpart K

40 CFR 262.204(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is withdrawing from the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.204(b)(1)-(11).

Section 262.204(c) provides that an eligible academic entity must keep a copy of the withdrawal notice on file at the eligible academic entity for three years from the date of the notification.

(d) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

Large quantity handlers of universal waste must notify EPA of their universal waste activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 273, Subpart C. Specifically, section 273.32(a) requires large quantity handlers of universal waste to have notified EPA of their universal waste handling activities and received an EPA Identification Number prior to meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3). Section 273.32(b) prescribes the contents of the notification. Large quantity handlers of universal waste have the option of using a letter in lieu of submitting EPA Form 8700-12 (i.e., the Site ID Form).

(e) Notification of Used Oil Activity under 40 CFR Part 279

Used oil handlers must notify EPA of their used oil management activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 279. (Refer to Table 2.) Specifically, sections 279.42, 279.51, 279.62, and 279.73 require used oil transporters and transfer facilities, used oil processors and re-refiners, burners of off-specification used oil, and used oil fuel marketers, respectively, who have not previously complied with RCRA Section 3010 requirements (under 40 CFR Part 266, Subpart E) to comply with these requirements and obtain an EPA Identification Number. These used oil handlers have the option of using a letter in lieu of submitting EPA Form 8700-12 (i.e., the Site ID Form).

**Table 2
Used Oil Notification Requirements**

40 CFR Regulatory Citation	Regulated Entity
§279.42	Used Oil Transporters and Transfer Facilities
§279.51	Used Oil Processors and Re-Refiners
§279.62	Burners of Off-Specification Used Oil
§279.73	Used Oil Fuel Marketers

(2) Hazardous Waste Report

RCRA Sections 3002 and 3004, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), require reporting to EPA or to authorized States at least every two years. The 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 Resource Conservation and Recovery (ORCR) 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.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED AND AUTHORITY FOR THE COLLECTION

(1) Notification of Regulated Waste Activity

Section 3010 of Subtitle C of RCRA, as amended, requires any person who generates, transports, or recycles regulated wastes or who owns or operates a facility for the treatment, storage, or disposal of regulated wastes to notify EPA of their activities, including the location and general description of the activities and the regulated wastes handled. As required by statute, EPA promulgated regulations to implement these notification requirements at 40 CFR Parts 262, 263, 264, 265, 266, 270, 273, and 279. (See Section 1(b) above for a detailed listing of notification requirements by type of regulated waste and regulated entity). EPA needs this information to determine the universe of persons who generate, handle, and manage these regulated wastes; assign EPA Identification Numbers; and ensure that these regulated wastes are managed in a way that protects human health and the environment, as required by RCRA, as amended.

(2) Hazardous Waste Report

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 TSDFs. 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: (1) quantities and nature of hazardous wastes that have been generated during the year and (2) 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.

There are a number of uses of the Hazardous Waste Report data. EPA uses these data for planning and developing regulations. In addition, Hazardous Waste 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, Hazardous Waste Report data provides information on whether wastes have shifted from one method of disposal to another. Some State uses of Hazardous Waste Report data include: support of planning, fee assessment, compliance monitoring, and enforcement.

2(b) PRACTICAL UTILITY AND USERS OF THE DATA

(1) Notification of Regulated Waste Activity

EPA enters notification information submitted by respondents into an EPA national data system and assigns EPA Identification Numbers. EPA uses the information primarily for tracking purposes, and secondarily for a variety of enforcement and inspection purposes. In addition, EPA uses this information to identify the universe of regulated waste generators, handlers, and managers and their specific regulated waste activities. Finally, EPA uses this information to ensure that regulated waste is managed properly, that statutory provisions are upheld, and that regulations are adhered to by facility owners or operators.

(2) Hazardous Waste Report

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 Hazardous Waste 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 Hazardous Waste 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 1991 to 2007 are available on the Internet at <http://www.epa.gov/waste/inforesources/data/biennialreport/index.htm>.

EPA and the 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.

- Estimating available capacity for treating, recycling, and disposing hazardous wastes.

Additionally, EPA utilizes the Hazardous Waste 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

The information collected under this ICR is not available from any source other than respondents. EPA's ORCR is the only office within the Agency requiring the recordkeeping or reporting of this information. No other Federal agency or department collects this information.

The RCRA site identification information is collected on one common form—the RCRA Subtitle C Site Identification Form—for the Notification of Regulated Waste Activity, the RCRA Hazardous Waste Part A Permit Application, and the Hazardous Waste Report. A respondent may submit a copy of a previously reported Site ID Form and note any changes; this verifies and updates the site identification information.

3(b) PUBLIC NOTICE

As indicated in Section 1(b), this is a request to renew two currently approved ICRs. EPA integrated these two ICRs into this current ICR, “Notification of Regulated Waste Activity and 2009 Hazardous Waste Report,” EPA ICR Number 0976.14, to ensure consistency and minimize duplication in its burden assumptions and estimates. Information on public notices associated with each of the currently approved ICRs is presented below.

- **“Notification of Regulated Waste Activity,” EPA ICR Number 0261.15.** In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on March 13, 2009 (74 FR 10909). The public comment period extended through May 12, 2009. EPA received no comments on this ICR in response to the *Federal Register* notice. A second *Federal Register* notice was issued on June 29, 2009 (74 FR 31028) announcing that the ICR had been forwarded to the Office of Management and Budget (OMB) for review and approval.
- **“2007 Hazardous Waste Report,” EPA ICR Number 0976.13.** In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on May 15, 2009 (74 FR 22922). The public comment period extended through July 14, 2009. EPA received no comments on this ICR in response to the *Federal Register* notice.

3(c) CONSULTATIONS

Most of the data and assumptions in this ICR are based on EPA consultations with industry or data from the Resource Conservation and Recovery Act Information (RCRAInfo) system². In developing this current ICR, EPA carefully reviewed all of the ICR's data and assumptions and determined that a few should be strengthened based on additional consultations. Specifically, EPA conducted consultations on the ICR's assumptions regarding respondents' hourly and cost burden for completing and submitting the Site ID Form.

Table 3 identifies the seven organizations contacted. All seven organizations indicated that they used a blank Site ID Form to make their initial and subsequent notifications. They also indicated that, individually, they spent between 5 minutes and 3 hours reading the form instructions, completing the form, and submitting it to EPA or the authorized State. Based on the information provided by these organizations, the average hourly burden for completing a blank Site ID Form for initial and subsequent notifications was estimated to be 1 hour. Of the seven organizations, four submitted their notification via certified mail, two submitted the completed form electronically, and one hand delivered the notification.

The feedback provided by the organizations identified in Table 3 is reflected in the burden assumptions of this ICR, as appropriate. Detailed information on EPA's assumptions regarding these and other activities are fully discussed in Section 6 of this document.

Table 3
Organizations EPA Contacted during the Development of this ICR (August 2009)

Organization	Contact Name	Phone Number
Avista Utilities Kettle Falls	Pamela Kish Environmental Coordinator	(509) 495-4948
Weill Cornell Medical College	Evan Alberts Environmental Specialist	(646) 962-5098
Johnson Oil USA, LLC	Jimmy Johnson President	(229) 378-5100
Recycle San Diego Inc.	Jeff Harding President	(858) 569-1807
Rexnord Industries, LLC	Thomas Frost Environmental Engineer	(414) 937-4332
Siemens Energy, Inc.	Amy Gray Senior HSE Engineer	(407) 736-5183
Southwest Petroleum Waste Management LLC	Lore Parker Office Manager	(623) 772-5992

² RCRAInfo is a national database used by EPA to track entities regulated under Subtitle C of RCRA (i.e., hazardous waste handlers). RCRAInfo includes data on general handler information, waste generation and management, permit or closure status, compliance with Federal and State regulations, and cleanup activities.

3(d) EFFECTS OF LESS FREQUENT COLLECTION

EPA has carefully considered the information collection burden imposed by the information collection requirements covered in this ICR. EPA is confident that those activities required of respondents are necessary, and to the extent possible, the Agency has attempted to minimize the burden imposed. A number of the required activities, for example, will be performed once (e.g., one-time notifications). EPA believes strongly that, if the minimum information collection requirements are not met, EPA will not be able to ensure that hazardous waste and hazardous secondary material is being properly managed and do not pose a threat to human health and the environment.

(1) Notification of Regulated Waste Activity

New hazardous waste generators, transporters, or TSDFs must submit EPA Form 8700-12 (i.e., the Site ID Form) and obtain an EPA Identification Number prior to treating (including recycling), storing, transporting, offering for transport, or disposing of hazardous waste. Existing hazardous waste generators, transporters, or TSDFs are required to notify the Agency of their hazardous waste activity(ies) not later than 90 days after the promulgation or revision of regulations in 40 CFR Part 261 (identification and listing of hazardous wastes). Owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities. Under Section 273.32(a), large quantity handlers of universal waste must submit a written, one-time notification of universal waste management to the Regional Administrator and obtain an EPA Identification Number before meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3). Under sections 279.42, 279.51, 279.62 and 279.73, used oil handlers who have not previously complied with the notification requirement (under 40 CFR Part 266, Subpart E) must submit a written, one-time notification of used oil management activities and obtain an EPA Identification Number. Any reduction in the frequency of this information collection would prevent the Agency from meeting the statutory requirements of RCRA Section 3010.

(2) Hazardous Waste Report

For the Hazardous Waste Report, the two-year cycle is statutorily required. Although 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, applicable OMB guidance, and EPA's ICR Handbook. In addition, this information collection complies with EPA's Data Standards and Information Quality Guidelines.

3(f) CONFIDENTIALITY

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which defines EPA's general policy on public disclosure of information, contain provisions for confidentiality. The Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the information submitted as part of their notifications. However, the Hazardous Waste 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 Hazardous Waste Report information from public disclosure by asserting a claim of confidentiality covering all or part of its information. If a confidentiality claim were asserted for any of the information collections covered in this ICR, EPA will treat the information in accordance with the regulations cited above. EPA also will ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

3(g) SENSITIVE QUESTIONS

No questions of a sensitive nature are included in any of the information collection requirements covered in this ICR.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) RESPONDENTS AND NAICS CODES

The following is a list of North American Industry Classification System (NAICS) codes associated with industries most likely affected by the information collection requirements covered in this ICR.

NAICS Code Description	NAICS Code
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
Finance and Insurance	52
Real Estate, Rental, Leasing	53
Professional, Scientific, and Technical Services	54
Management of Companies and Enterprises	55
Administrative Support, Waste Management, and Remediation	56
Educational Services	61
Health Care and Social Assistance	62
Arts, Entertainment, Recreation	71
Accommodation and Food Services	72
Other Services	81
Public Administration	92

4(b) INFORMATION REQUESTED

(1) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

40 CFR 260.42(a) provides that hazardous secondary material generators, tolling contractors, toll manufacturers, reclaimers, and intermediate facilities managing hazardous secondary materials which are excluded from regulation under section 261.2(a)(2)(ii) or section 261.4(a)(23), (24), or (25) must send a notification prior to operating under the exclusion(s) and by March 1 of each even numbered year thereafter to the Regional Administrator using EPA Form 8700-12 that includes the specified information at section 260.42(a)(1)-(10).

Section 260.42(b) provides that, if a hazardous secondary material generator, tolling contractor, toll manufacturer, reclaimer or intermediate facility has submitted a notification, but then subsequently stops managing hazardous secondary materials in accordance with the exclusion(s), the facility must notify the Regional Administrator within thirty (30) days using EPA Form 8700-12. For purposes of this section, a facility has stopped managing hazardous secondary materials if the facility no longer generates, manages and/or reclaims hazardous secondary materials under the exclusion(s) and does not expect to manage any amount of hazardous secondary materials for at least one year

(i) Data Items:

- Notification using EPA Form 8700-12, which includes the following information:
 - The name, address, and EPA ID number (if applicable) of the facility;
 - The name and telephone number of a contact person;
 - The NAICS code of the facility;
 - The exclusion under which the hazardous secondary materials will be managed (e.g., section 261.2(a)(2)(ii), section 261.4(a)(23), (24), and/or (25));
 - For reclaimers and intermediate facilities managing hazardous secondary materials in accordance with section 261.4(a)(24) or (25), whether the reclaimer or intermediate facility has financial assurance (not applicable for persons managing hazardous secondary materials generated and reclaimed under the control of the generator);
 - When the facility expects to begin managing the hazardous secondary materials in accordance with the exclusion;
 - A list of hazardous secondary materials that will be managed according to the exclusion (reported as the EPA hazardous waste numbers that would apply if the hazardous secondary materials were managed as hazardous wastes);
 - For each hazardous secondary material, whether the hazardous secondary material, or any portion thereof, will be managed in a land-based unit;
 - The quantity of each hazardous secondary material to be managed annually; and
 - The certification (included in EPA Form 8700-12) signed and dated by an authorized representative of the facility.

(ii) Respondent Activities:

- Complete and submit EPA Form 8700-12 prior to operating under exclusion(s).
- Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter.
- Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion, if applicable.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

Facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste as defined by 40 CFR Part 261 must notify EPA of their hazardous waste activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Parts 262, 263, 264, 265, 266, 270, and 273. In order to comply with these requirements, facilities must complete and submit EPA Form 8700-12.

(i) Data Item:

- Notification using EPA Form 8700-12, which includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;
 - Information on whether this is the initial notification or a subsequent notification;
 - A description of the hazardous wastes handled at the facility; and
 - A certification signed by the facility owner, operator, or authorized representative.

(ii) Respondent Activities:

- Complete and submit EPA Form 8700-12.

(c) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

(c1) Intent to Comply with Subpart K and Recordkeeping of Agreements

40 CFR 262.203(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.203(b)(1)-(11).

Section 262.203(c) provides that an eligible academic entity must keep a copy of the notification on file at the eligible academic entity while its laboratories are subject to Subpart K.

Section 262.203(d) provides that a teaching hospital that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the teaching hospital while its laboratories are subject to Subpart K.

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

(i) Data Items:

- Notification, using EPA Form 8700-12, with the following fields filled out, at a minimum:
 - Reason for submittal;
 - Site EPA Identification Number (except for CESQGs);
 - Site name;
 - Site location information;
 - Site land type;
 - North American Industry Classification System (NAICS) code(s) for the site;
 - Site mailing address;
 - Site contact person;
 - Operator and legal owner of the site;
 - Type of regulated waste activity; and
 - Certification.
- A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(d).
- A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(e).

(ii) Respondent Activities:

- Eligible academic entities electing to be subject to the requirements of Subpart K must perform the following:
 - Complete and submit EPA Form 8700-12; and
 - Keep a copy of the notification on file.
- Teaching hospitals that are not owned by a college or university must:
 - Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K.
- Non-profit research institutes that are not owned by a college or university must:

- Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

(c2) *Withdrawal from 40 CFR Part 262, Subpart K*

40 CFR 262.204(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is withdrawing from the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.204(b)(1)-(11).

Section 262.204(c) provides that an eligible academic entity must keep a copy of the withdrawal notice on file at the eligible academic entity for three years from the date of the notification.

(i) Data Items:

- A Site ID Form with the following fields filled out, at a minimum:
 - Reason for submittal;
 - Site EPA Identification Number (except for CESQGs);
 - Site name;
 - Site location information;
 - Site land type;
 - North American Industry Classification System (NAICS) code(s) for the site;
 - Site mailing address;
 - Site contact person;
 - Operator and legal owner of the site;
 - Type of regulated waste activity; and
 - Certification.

(ii) Respondent Activities:

- Complete and submit EPA Form 8700-12.
- Keep a copy of the withdrawal notice on file.

(d) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

Large quantity handlers of universal waste must notify EPA of their universal waste activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 273, Subpart C. In order to comply with these requirements, large quantity handlers of universal waste must complete and submit a notification (EPA Form 8700-12), or complete and submit a letter to EPA requesting an EPA Identification Number.

(i) Data Items:

- Notification (EPA Form 8700-12) that includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;
 - Information on whether this is the initial notification or a subsequent notification;
 - A description of the hazardous wastes handled at the facility; and
 - A certification signed by the facility owner, operator, or authorized representative.

Or

- A letter that includes:
 - The universal waste handler's name and mailing address;
 - Name and business telephone number of the person who should be contacted regarding the universal waste management activities;
 - Address or physical location of the universal waste management activities;
 - A list of all of the types of universal waste managed by the handler; and
 - A statement indicating that the handler is accumulating more than 5,000 kilograms of universal waste at one time and the types of universal waste (e.g., batteries, pesticides, thermostats) the handler is accumulating above this quantity.

(ii) Respondent Activities:

- Complete and submit EPA Form 8700-12 or a letter requesting an EPA Identification Number.

(e) Notification of Used Oil Activity under 40 CFR Part 279

Used oil handlers must notify EPA of their used oil activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 279. In order to comply with these requirements, used oil handlers must complete and submit EPA Form 8700-12, or complete and submit a letter to EPA requesting an EPA Identification Number.

(i) Data Items:

- Notification using EPA Form 8700-12, which includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;
 - Information on whether this is the initial notification or a subsequent notification;
 - A description of the hazardous wastes handled at the facility; and
 - A certification signed by the facility owner, operator, or authorized representative.

Or

- A letter that includes:
 - Company name;
 - Owner of company;
 - Mailing address of company;
 - Name and telephone number of company contact;
 - Type of used oil management activity(ies);
 - Location of facility(ies) (except for used oil fuel marketers); and
 - Name and telephone number of each contact at each transfer facility, if applicable (for used oil transporters and transfer facilities only).

(ii) Respondent Activities:

- Complete and submit EPA Form 8700-12 or a letter requesting an EPA Identification Number.

(2) Hazardous Waste Report

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 ID Form must be submitted by all sites required to file the 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. 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 the reporting year. 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 the reporting year. 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 GM and WR Forms where only the EPA Identification Number is listed.

(ii) Respondent Activities:

- Read the Hazardous Waste Report instructions.
- Gather information and complete Site ID 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).
- Maintain a copy of each form for three years.

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

5(a) AGENCY ACTIVITIES

(1) Notification of Regulated Waste Activity

Agency activities are the same for all of the notification requirements covered in this ICR. These activities include:

- For initial notifications:
 - Reviewing the completed EPA Form 8700-12 or letter requesting an EPA Identification Number, as specified.
 - Entering information into the EPA national data system.
 - Generating an EPA Identification Number and sending the EPA Identification Number to the facility.
- For subsequent notifications:
 - Reviewing the completed EPA Form 8700-12 or letter requesting an EPA Identification Number, as specified.
 - Entering information into the EPA national data system.

(2) Hazardous Waste Report

As with most of the RCRA program, the Hazardous Waste 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 Hazardous Waste 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.

Agency activities for the Hazardous Waste Report include the following:

- ***Develop Hazardous Waste Report forms and instructions.*** Print paper and CD copies.
- ***Distribute Hazardous Waste 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 ID 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.
- ***Key entry of 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* that will be made available to the Congress and the public.
- **Store the data.** The Hazardous Waste 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

In collecting and analyzing the information associated with this ICR, EPA and authorized States may use a telephone system, personal computers, and applicable database software. They will ensure the accuracy and completeness of collected information by reviewing the submittals. They will keep records of this information in file cabinets and/or computer systems.

5(c) SMALL ENTITY FLEXIBILITY

(1) Notification of Regulated Waste Activity

Some respondents will be individuals or small organizations. However, EPA believes that the information to be collected is the minimum amount necessary to fulfill the statutory requirements of RCRA.

(2) Hazardous Waste Report

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 Hazardous Waste Report. A SQG who is sent the Hazardous Waste Report booklet 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

(1) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

A claimant must prepare and submit a notification to EPA prior to operating under the exclusion(s). In addition, the claimant must update and submit notification to EPA by March 1 of each even numbered year thereafter. A claimant that submitted a notification but then subsequently stops managing hazardous secondary materials in accordance with the exclusion(s) must submit notification to EPA within 30 days.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

Under sections 262.12, 263.11, 264.11 and 265.11, all new hazardous waste generators, transporters, and TSDFs must notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Under section 270.1(b), these hazardous waste generators, transporters, and TSDFs, are also subject to newly promulgated or revised regulations at 40 CFR Part 261 (identification and listing of hazardous wastes) and must notify EPA of new or revised hazardous waste activities no later than 90 days after promulgation or revision. In addition, other generators; transporters; recyclers; and treatment, storage and disposal facilities that are subject to notification requirements under sections 266.21, 266.22, 266.23, 266.70(b)(1), 266.80(b)(1)(i), 266.80(b)(2)(i), 266.101(a), 266.101(b), 266.101(c), 266.102(a)(2)(ii), 266.103(a)(4)(ii), and 273.60(a) must notify EPA of their hazardous waste activities within the same time frame. Under section 273.54, universal waste transporters who determine that any material resulting

from a release of universal waste is a hazardous waste are subject to 40 CFR Part 262. As a result, these transporters may also be subject to, under these circumstances, the section 262.12 notification requirements and procedures. As such, these transporters must, at that time, notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Finally, owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities.

(c) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

(c1) Intent to Comply with Subpart K and Recordkeeping of Agreements

Under 40 CFR 262.203(a), an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K. This is a one-time notification.

Section 262.203(c) provides that an eligible academic entity must keep a copy of the notification on file at the eligible academic entity while its laboratories are subject to Subpart K.

Section 262.203(d) provides that a teaching hospital that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the teaching hospital while its laboratories are subject to Subpart K.

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

(c2) Withdrawal from 40 CFR Part 262, Subpart K

Under 40 CFR 262.204(a), an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each

EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K. This is a one-time notification.

Section 262.204(c) provides that an eligible academic entity must keep a copy of the withdrawal notice on file at the eligible academic entity for three years from the date of the notification.

(d) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

Under Section 273.32(a)(1), large quantity handlers of universal waste must submit a written, one-time notification of universal waste activity to the Regional Administrator and obtain an EPA Identification Number before meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3).

(e) Notification of Used Oil Activity under 40 CFR Part 279

Under sections 279.42, 279.51, 279.62 and 279.73, used oil handlers who were not previously required to comply with the notification requirements (under 40 CFR Part 266, Subpart E) must submit a written, one-time notification of their used oil management activities and obtain an EPA Identification Number.

(2) Hazardous Waste Report

EPA's 2009 Hazardous Waste Report national implementation schedule is outlined in Table 4.

Table 4
2009 Hazardous Waste Report National Implementation Schedule

Activity	Completion Date
Implementers begin loading 2009 Hazardous Waste Report data into RCRAInfo Biennial Report National Data Quality Reports & National Exhibit Reports available for use in performing additional DQ checks	April 5, 2010
DEADLINE for Implementers to load Complete Data into RCRAInfo for HQ's national DQ Review work and publication of the Preliminary 2009 National Biennial Report	June 7, 2010
HQ Publishes Preliminary 2009 National Biennial Report (Post in RCRAInfo)	July 6, 2010
HQ performs a national DQ review of 2009 Hazardous Waste Report data as each State's data is loaded into RCRAInfo and provides results to States and Regions for use in completing FINAL DQ corrections	September, 6, 2010
DEADLINE for Implementers to load FINAL Data into RCRAInfo for development of Final 2009 National Biennial Report	October 4, 2010
HQ Publishes Final 2009 National Biennial Report (Post on Internet ONLY)	December 13, 2010

Source: EPA, 2009 Biennial Report National Implementation Schedule. Available online at:
<http://www.epa.gov/waste/inforesources/data/biennialreport/index.htm>, last accessed on August 14, 2009.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) ESTIMATING RESPONDENT BURDEN HOURS

Exhibits 1 and 2 provide estimates of the respondent hourly burden associated with the information collection requirements covered in this ICR. The exhibits include burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. The majority of the hour estimates in Exhibits 1 and 2 are based on industry consultations that EPA performed in renewing this ICR.

In the following paragraphs, EPA describes the methodologies used to estimate the hourly burden associated with the information collections covered in this ICR.

(1) Notification of Regulated Waste Activity

EPA contacted seven industry representatives to ascertain their burden for completing the Site ID Form for initial and subsequent notifications. All of them indicated that they complete a blank Site ID Form for each notification and their burdens ranged from 5 minutes to 3 hours per submittal. Refer to Section 3(c) of this document for additional information on the data collected.

None of the industry representatives used the Site ID Form's optional procedures to use a previously submitted Site ID Form to make a subsequent notification. Specifically, the Site ID Form's instructions indicate that, after a facility has submitted the form once, the State may allow the facility to attach a copy of the facility's most recently submitted form. If so, the facility must circle item numbers for which any information has changed. Then, circle the item numbers in the new form, enter the new information, and provide the required signatures in Item 14-Certification.

Although none of the industry representatives used a previously submitted form to notify, the Agency believes that a number of respondents do so. This is based on the Agency's knowledge of common industry practices. For purposes of this ICR, EPA has estimated the percentage of respondents that use a previously submitted form to make a subsequent notification and their burden for doing so. These estimates, along with the consultation data collected, are discussed in the paragraphs below.

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

For purposes of this ICR, EPA anticipates that all of the facilities electing to operate under the hazardous secondary material exclusion under 40 CFR 260.42 during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form to notify EPA or the State prior to operating under the exclusion and by March 1 of each even numbered year. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form under section 260.42 to be 1.5 hours per respondent and the burden for using a previously submitted form to be 50 minutes (0.83 hour) per respondent. EPA notes that section 260.42 imposes several new, substantive requirements specific to the exclusions that must be completed (e.g., quantity of secondary material to be managed annually) in addition to the rest of the Site ID Form.

For the notification submitted indicating that the hazardous secondary materials are no longer managed in accordance to the exclusion, EPA estimates the average hourly burden for completing the Site ID Form in its entirety (i.e., a blank form) to be 1 hour per respondent. EPA also estimates the average hourly burden for updating the most recently submitted Site ID Form to be 20 minutes (0.33 hour) per respondent.

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 5 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 5
Assumptions and Weighted-Average Equation
Used in Estimating Burden to Complete the Notification of
Hazardous Secondary Material Activity under 40 CFR 260.42

Assumptions	Weighted-Average Equation
Notification Prior to Operating under Exclusion AND Notification Submitted by March 1 of Each Even Numbered Year Thereafter	
1.5 hours to complete blank form; 50 percent of the facilities	$(1.5 \text{ hrs} \times 0.50) + (0.83 \text{ hr} \times 0.50)$ $= 1.17 \text{ hours}$
0.83 hour to update most recently submitted form; 50 percent of the facilities	
Notification Indicating that Hazardous Secondary Materials are no Longer Managed in Accordance to the Exclusion	
1 hour to complete blank form; 50 percent of the facilities	$(1 \text{ hr} \times 0.50) + (0.33 \text{ hr} \times 0.50)$ $= 0.67 \text{ hour}$
0.33 hour to update most recently submitted form; 50 percent of the facilities	

(b) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

For purposes of this ICR, EPA anticipates that all of the facilities opting into Subpart K during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form in opting into Subpart K and in withdrawing from Subpart K. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form under Subpart K to be 1 hour per respondent and the burden for using a previously submitted form to be 20 minutes (0.33 hour) per respondent.

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 6 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 6
Assumptions and Weighted-Average Equation
Used in Estimating Burden to Complete the Notification of
Hazardous Waste Activity under 40 CFR Part 262, Subpart K**

Assumptions	Weighted-Average Equation
1 hour to complete blank form; 50 percent of the facilities	$(1 \text{ hr} \times 0.50) + (0.33 \text{ hr} \times 0.50)$ $= 0.67 \text{ hour}$
0.33 hour to update most recently submitted form; 50 percent of the facilities	

(c) Other Notifications Covered in this ICR

For purposes of this ICR, EPA anticipates that 50 percent of the facilities submitting initial notifications under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279 will complete a blank Site ID Form. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form to be 1 hour per respondent and the burden for using a previously submitted form to be 20 minutes (0.33 hour) per respondent.

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 7 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 7
Assumptions and Weighted-Average Equation Used in
Estimating Burden to Complete Other Notifications Covered in this ICR**

Assumptions	Weighted-Average Equation
1 hour to complete blank form; 50 percent of the facilities	$(1 \text{ hr} \times 0.50) + (0.33 \text{ hr} \times 0.50)$ $= 0.67 \text{ hour}$
0.33 hour to update most recently submitted form; 50 percent of the facilities	

(2) Hazardous Waste Report

(a) Methodology for Accounting for Site Identification Forms Pre-Populated by States

In estimating the hourly burden for preparing the Site ID Form of the Hazardous Waste Report, EPA assumes that 65 percent of all the Site ID Forms will be pre-populated by States prior to distribution to respondents or by vendor software used by the respondents. EPA also assumes that the remaining 35 percent of all the Site ID Forms will be completed manually.

EPA estimates the burden for updating a pre-populated Site ID Form to be 20 minutes (0.33 hour) per respondent and the burden for completing a Site ID Form in its entirety (i.e., completing a blank form manually) to be 1 hour per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 8 below. EPA multiplied the percentage of pre-populated Site ID Forms by the average burden for updating the information contained in the form. EPA also multiplied the percentage of blank Site ID 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 8
Assumptions and Weighted-Average Equation Used in Estimating Burden to Complete the Site Identification Form of the Hazardous Waste Report

Assumptions	Weighted-Average Equation
0.33 hours to complete pre-populated form; 65 percent of the forms are pre-populated	$(0.33 \text{ hrs} \times 0.65) + (1 \text{ hr} \times 0.35)$ $= 0.56 \text{ hours}$
1 hour to complete blank form; 35 percent of the forms are blank	

(b) Methodology for Accounting for Form GM and Form WR Electronic Reporting

During consultations conducted during the development of previous versions of the Hazardous Waste Report ICR, State and facility 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 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 consultations and 2007 Hazardous Waste Report data. For GM Form submissions, EPA estimated that, based on consultations and best professional judgment, facilities submitting five (5) or more GM Forms for the Hazardous Waste Report are likely to do so electronically. Using 2007 Hazardous Waste Report data³, 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 48 percent of GM Forms are submitted electronically, while the remaining 52 percent are sent manually.

³ 2007 Hazardous Waste Report (i.e., 2007 Biennial Report) data used in this analysis are current as of September 6, 2009.

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 submit Hazardous Waste Report data electronically. Using 2007 Hazardous Waste Report data⁴, EPA reviewed the list of WR Forms reported to the Hazardous Waste Report by facility and, based on its own professional judgment and consultations, estimates that 100 percent of WR Forms are submitted electronically.

To estimate the average burden per respondent in preparing a GM or WR Form, EPA used the weighted-average calculations in Table 9. 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. These weighted-average burden estimates are used in Exhibit 2 to estimate total respondent burden for the GM and WR Forms.

Table 9
Assumptions and Weighted-Average Equations Used in Estimating Burden to Complete Form GM and Form WR of the Hazardous Waste Report

Activity	Assumptions	Weighted-Average Equation
Complete Form GM	0.16 hour to complete electronically; 48% of the forms are completed electronically 1.04 hours to complete manually; 52% of the forms are completed manually	$(0.16 \text{ hr} \times 0.48) + (1.04 \text{ hrs} \times 0.52)$ $= 0.61 \text{ hour}$
Complete Form WR	0.16 hour to complete electronically; 100% of the forms are completed electronically	$0.16 \text{ hr} \times 1 = 0.16 \text{ hour}$

⁴ 2007 Hazardous Waste Report (i.e., 2007 Biennial Report) data used in this analysis are current as of September 6, 2009.

6(b) ESTIMATING RESPONDENT COSTS

Exhibits 1 and 2 provide estimates of the annual respondent costs associated with the information collection requirements covered in this ICR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M).

(1) Labor Costs

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$118.68 for legal staff, \$70.15 for managerial staff, \$52.26 for technical staff, and \$31.44 for clerical staff. These respondent labor costs were obtained from a previously approved ICR (i.e., “Revisions to the RCRA Definition of Solid Waste,” EPA ICR Number 2310.01, dated October 28, 2008), and updated to 2009 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.⁵

Using the total burden hours discussed in Section 6(a) and the hourly labor costs outlined in this section, Exhibits 1 and 2 illustrate the labor costs associated with the information collection requirements covered in this ICR.

(2) Capital Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

(3) Operation and Maintenance Costs

O&M costs are those costs associated with an information collection requirement incurred continually over the life of the ICR. For this ICR, O&M costs include mailing costs. In particular, EPA estimates that respondents will incur a cost of \$3.25 to mail a one-ounce package by certified mail (\$0.44 for postage, \$2.80 for the certified-mail fee, and \$0.01 for standard-size envelope). These O&M costs are shown in Exhibits 1 and 2 for all applicable respondent activities.

⁵ Bureau of Labor Statistics, “Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational group and industry,” *Employment Cost Index-June 2009*, June 31, 2009. Available online at: <http://www.bls.gov/news.release/pdf/eci.pdf>, last accessed on August 14, 2009. Civilian Workers, All Workers, June 2008=108.3 and June 2009=110.3.

6(c) ESTIMATING AGENCY HOUR AND COST BURDEN

(1) Federal Agency

EPA estimates the Federal agency hour and cost burden associated with the notification and Hazardous Waste Report information collection requirements in Exhibits 3 and 4, respectively. As shown in the exhibits, EPA estimates an average hourly labor cost of \$85.28 for legal staff (GS15, Step 5), \$75.25 for managerial staff (GS-15, Step 1), \$54.14 for technical staff (GS-13, Step 1), and \$23.09 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2009. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

(2) State Agency

EPA estimates the State agency hour and cost burden associated with the Hazardous Waste Report information collection requirements in Exhibit 5. As shown in the exhibit, EPA estimates an average hourly State agency labor cost (including fringe and overhead) of \$57.43 for legal staff, \$53.91 for managerial staff, \$32.26 for technical staff, and \$20.58 for clerical staff. These State agency labor costs were obtained from a previously approved ICR (i.e., “2007 Hazardous Waste Report,” EPA ICR Number 0976.13, dated September 18, 2007), and updated to 2009 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.⁶

6(d) ESTIMATING RESPONDENT UNIVERSE AND TOTAL HOUR AND COST BURDEN

In this section, EPA first describes the estimated respondent universe. EPA then estimates the annual burden to respondents under the information collection requirements covered in this ICR.

(1) Respondent Universe

(a) Notification of Regulated Waste Activity

(a1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

In estimating the number of respondents subject to the notification of hazardous secondary material activity under 40 CFR 260.42, EPA referred to the ICR developed for the recently promulgated rule: “Revisions to the RCRA Definition of Solid Waste,” EPA ICR Number 2310.01. These estimates are presented in Table 10 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 1 of this ICR.

⁶ Bureau of Labor Statistics, “Table 7. Employment Cost Index for total compensation¹, for State and local government workers, by occupational group and industry,” *Employment Cost Index-June 2009*, June 31, 2009. Available online at: <http://www.bls.gov/news.release/pdf/eci.pdf>, last accessed on August 14, 2009. State and Local Government Workers, All Workers, June 2008=109.4 and June 2009=112.9.

Table 10
Annual Number of Respondents Subject to the
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42 ^a

Respondent Universe	Number of Respondents		
	State and Local Government	Private Sector	Total
Total number of facilities submitting notification prior to operating under exclusion	111	1,601	1,712
Number of small quantity generators (SQGs) submitting notification by March 1 of each even numbered year thereafter	15	216	231

^a Based on information contained in currently approved EPA ICR Number 2310.01, "Revisions to the RCRA Definition of Solid Waste," dated October 28, 2008.

(a2) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

In estimating the number of respondents subject to the notification of hazardous waste activity under 40 CFR Part 262, Subpart K, EPA referred to the ICR developed for the recently promulgated rule: "Generator Standards Applicable to Laboratories Owned by Eligible Academic Entities," EPA ICR Number 2317.01. These estimates are presented in Table 11 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 1 of this ICR.

Table 11
Annual Number of Respondents Subject to the
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K ^a

Respondent Universe	Number of Respondents		
	State and Local Government	Private Sector	Total
Number of eligible academic entities submitting notification of intent to comply with Subpart K and recordkeeping of agreements	11	26	37
Number of teaching hospitals not owned by a college or university opting into Subpart K	1	1	2
Number of non-profit research institutes not owned by a college or university opting into Subpart K	0	1	1
Number of eligible academic entities submitting notification of withdrawal from 40 CFR Part 262, Subpart K	0	0	0

^a Based on information contained in currently approved EPA ICR Number 2317.01, "Generator Standards Applicable to Laboratories Owned by Eligible Academic Entities," dated July 14, 2008.

(a3) Other Notifications Covered in this ICR

In estimating the number of respondents subject to the notification requirements covered under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279, EPA referred to the Resource Conservation and Recovery Act Information (RCRAInfo) system⁷. EPA estimated the annual number of initial and subsequent notifications tracked by RCRAInfo. EPA then averaged the number of notifications submitted in 2007 and 2008. These estimates are presented in Table 12 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 1 of this ICR.

⁷ RCRAInfo is a national database used by EPA to track entities regulated under Subtitle C of RCRA (i.e., hazardous waste handlers). RCRAInfo includes data on general handler information, waste generation and management, permit or closure status, compliance with Federal and State regulations, and cleanup activities.

Table 12
Annual Number of Respondents Subject to the Notification Requirements
under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279 ^a

Respondent Universe	Year 2007			Year 2008			Average of Years 2007 and 2008		
	State and Local Government ^b	Private Sector ^c	Total	State and Local Government ^b	Private Sector ^c	Total	State and Local Government ^b	Private Sector ^c	Total
Notification of Hazardous Waste Activity under RCRA Section 3010									
Number of facilities submitting initial notification	1,619	8,806	10,425	2,156	7,930	10,086	1,888	8,368	10,256
Number of facilities submitting subsequent notification	1,535	32,585	34,120	1,739	35,426	37,165	1,637	34,006	35,643
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C									
Number of facilities submitting initial notification	2	21	23	9	37	46	6	29	35
Number of facilities submitting subsequent notification	1	10	11	0	6	6	1	8	9
Notification of Used Oil Activity under 40 CFR Part 279									
Number of facilities submitting initial notification	5	102	107	12	115	127	8	109	117
Number of facilities submitting subsequent notification	4	109	113	4	134	138	4	122	126

^a Based on data from two RCRAInfo tables: (1) "Hhandler" and (2) "Howner_operator2." Both tables contain data current as of July 10, 2009.

^b Includes facilities owned and/or operated by a "County," "District," "Indian," "Municipal," or "State." Note that, in order to qualify as "State and local government," the facility cannot be owned or operated by the Federal government. For example, a facility owned by the Federal government and operated by a Municipal government would qualify as a "Federal government" facility, not a "State and local government" facility.

^c Includes facilities owned and/or operated by "private" or "other." Note that, in order to qualify as "private," the facility cannot be owned or operated by a Federal, State, or local government. For example, a facility owned by a State government and operated by a private entity would qualify as a "State and local government" facility, not as a "private" facility.

(b) Hazardous Waste Report

Based on 2007 Hazardous Waste Report data⁸, EPA estimates that the total number of respondents to the 2009 Hazardous Waste Report will be 16,483, which annualized over the two-year report cycle equals 8,242 per year (i.e., 16,483/2). Table 13 presents information on the total number of forms associated with the 2009 Hazardous Waste Report. In estimating annual respondent burden and cost, EPA annualized these numbers over the two-year report cycle.

Table 13
Total Number of 2009 Hazardous Waste Report Forms

Hazardous Waste Report Form	Number of Forms ^a		
	State and Local Government	Private Sector	Total
Site Identification (Site ID) Form	1,347	15,136	16,483
Form GM - Generation and Management	16,873	189,121	205,994
Form WR - Waste Received from Offsite	13,668	847,972	861,640
Total	31,888	1,052,229	1,084,117

^a Based on 2007 Hazardous Waste Report (i.e., 2007 Biennial Report) data current as of September 6, 2009.

The number of respondents and forms for each respondent activity is presented in Exhibit 2. These estimates assume that all forms are submitted in accordance with the Hazardous Waste Report instructions. Exhibit 2 also estimates the annual respondent burden and cost for the activities examined.

(2) Annual Respondent Burden

(a) Notification of Regulated Waste Activity (Exhibit 1)

(a1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

EPA estimates that, each year, 1,712 entities will notify EPA under section 260.42 prior to operating under the exclusion and be required to complete the information laid out at section 260.42(a). This includes 1,579 hazardous secondary materials generators, tolling contractors and toll manufacturers; 80 intermediate facilities; and 53 reclaimers.

In addition, entities must re-notify EPA using the Site ID Form by March 1 of each even numbered year thereafter. Note that the Hazardous Waste Report regulations already require the submittal of the Site ID Form by March 1 of each even numbered year by large quantity generators (40 CFR Part 262) and treatment, storage and disposal facilities (40 CFR Part 264 and 265). Hence, this section of the ICR estimates burden for SQG re-notifications only. For purposes of this ICR, EPA estimates that a total of 462 SQGs will re-notify over the two-year

⁸ 2007 Hazardous Waste Report (i.e., 2007 Biennial Report) data used in this analysis are current as of September 6, 2009.

period covered by this ICR. Because each of these entities will perform this re-notification activity once during the two-period covered by this ICR, EPA has annualized the number of entities by dividing them by two (i.e., $462/2 = 231$ SQGs annually).⁹

EPA estimates that, each year, five percent of entities (i.e., $1,712 \times 0.05 = 86$) will re-notify because they stopped operating under the exclusion.

(a2) Notification of Hazardous Waste Activity under RCRA Section 3010

EPA estimates that, each year, 10,256 facilities will submit an initial notification of hazardous waste activity under RCRA Section 3010. EPA also estimates that, each year, 35,643 facilities will submit a subsequent notification associated with these requirements.

(a3) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

Intent to Comply with Subpart K and Recordkeeping of Agreements

An eligible academic entity must submit the Site ID Form to notify EPA or the authorized State that it is electing to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all laboratories that are owned or operated by the eligible academic entity that are on-site. EPA estimates that, each year, 37 forms will be completed, submitted, and retained.

Teaching hospitals opting into Subpart K must keep a copy of their formal written affiliation agreement with a college or university on file if they are not owned by a college or university. EPA estimates that, each year, two (2) sites will retain the agreements on file.

Non-profit research institutes not owned by a college or university opting into Subpart K must keep a copy of the formal written affiliation agreement with a college or university on file. EPA estimates that, each year, one (1) site will retain the agreement on file.

Withdrawal from 40 CFR Part 262, Subpart K

EPA does not expect any eligible academic entity to submit a withdrawal notification during the two-year period covered by this ICR.

(a4) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

EPA estimates that, each year, 35 facilities will submit an initial notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e., $35 \times 0.75 = 26$) will use the Site ID Form and 25 percent (i.e., $35 \times 0.25 = 9$) will prepare and submit a letter requesting an EPA Identification Number.

⁹ Even though these 462 SQGs are expected to re-notify once during the period covered by this ICR, EPA has annualized them over two years to estimate the *average annual burden* of the requirements. Note that this approach is taken with other one-time activities in this ICR, as applicable.

EPA also estimates that, each year, 9 facilities will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e., $9 \times 0.75 = 7$) will use the Site ID Form and 25 percent (i.e., $9 \times 0.25 = 2$) will prepare and submit a letter requesting an EPA Identification Number.

(a5) Notification of Used Oil Activity under 40 CFR Part 279

EPA estimates that, each year, 117 facilities will submit an initial notification of used oil activity under 40 CFR Part 279. Of these facilities, 75 percent (i.e., $117 \times 0.75 = 88$) will use the Site ID Form and 25 percent (i.e., $117 \times 0.25 = 29$) will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, 126 facilities will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e., $126 \times 0.75 = 95$) will use the Site ID Form and 25 percent (i.e., $126 \times 0.25 = 31$) will prepare and submit a letter requesting an EPA Identification Number.

(b) Hazardous Waste Report (Exhibit 2)

(b1) Gather Information and Complete Site Identification Form

EPA estimates that all 16,483 respondents will complete and submit a Site ID Form with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 8,242 respondents preparing and submitting a Site ID Form each year.

(b2) Gather Information and Complete Form GM

EPA estimates that respondents will submit a total of 205,994 GM Forms with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 102,997 GM Forms each year.

(b3) Gather Information and Complete Form WR

EPA estimates that respondents will submit a total of 861,640 WR Forms with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 430,820 WR Forms each year.

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).

(b4) 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.

(b5) Submit the Biennial Report to State/Region

EPA expects each respondent, 8,242 facilities per year, to submit the report to the appropriate State or Region.

(b6) Maintain a Copy of Each Form

EPA expects facilities to retain an estimated 542,059 (i.e., 8,242 Site ID Forms + 102,997 GM Forms + 430,820 WR Forms) forms each year.

6(e) BOTTOM LINE HOUR AND COST BURDEN

(1) Respondent Tally

Exhibit 6 summarizes the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual respondent burden to be 206,305 hours and \$10,598,875. The bottom line burden to respondents over two years is estimated to be 412,610 hours and \$21,197,750.

(2) Agency Tally

(a) Federal Agency

Exhibit 7 summarizes the total annual Federal agency hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual Federal agency burden to be 126,245 hours and \$6,477,984. The bottom line burden to the Federal agency over two years is estimated to be 252,490 hours and \$12,955,968.

(a) State Agency

Exhibit 8 summarizes the total annual State agency hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual State agency burden to be 215,828 hours and \$5,911,150. The bottom line burden to State agencies over two years is estimated to be 431,656 hours and \$11,822,300.

6(f) REASONS FOR CHANGE IN BURDEN

(1) Notification of Regulated Waste Activity

The currently approved Notification ICR (EPA ICR Number 0261.15) covers the notification requirements under RCRA Section 3010 (i.e., for hazardous waste activities); 40 CFR Part 273, Subpart C (i.e., for universal waste activities); and 40 CFR Part 279 (i.e., for used oil activities). The annual respondent burden estimate in the currently approved Notification ICR was 139,656 hours, with a total cost of \$255,830 for capital/start-up and O&M. The annual respondent burden estimate for the same notification requirements covered in this

current ICR is 36,525 hours, with a total cost of \$156,819 capital/start-up and O&M. This represents a decrease of 103,131 hours and \$99,011 in total cost for capital/start-up and O&M.

This decrease in burden for respondents has occurred for two primary reasons. First, there was a decrease in the total number of notifications under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279. The total number of initial notifications decreased from 13,487 in the currently approved ICR to 10,408 in this current ICR. The total number of subsequent notifications decreased from 42,428 in the currently approved ICR to 35,778 in this current ICR. Note that, in estimating the number of initial and subsequent notifications in this current ICR, EPA used the average of the number of notifications submitted in 2007 and 2008 (see Table 12). In each of these years, there was a decrease in the total annual number of notifications submitted to EPA, when compared to the annual number of notifications in the currently approved ICR. Thus, EPA believes that the number of notifications included in this current ICR is consistent with the respondent universe subject to these notification requirements.

Second, the burden associated with the notification activities decreased because of adjustments made to the hourly burden estimates for the Site ID Form. These adjustments were based, in part, on consultations with industry representatives. Refer to Section 3(c) for additional information on consultations. In addition, adjustments were made to the hourly burden estimates for the Site ID Form based on EPA's best judgment to take into account the option given to respondents in the Site ID Form's instructions to use their most recently submitted form in making a subsequent notification. These optional procedures relieve them of the need to complete the form from in its entirety (i.e., complete a blank form), saving time. These adjustments do not reflect any change in requirements; they represent instead a more accurate representation of the burden that respondents will incur as a result of this information collection.

(2) Hazardous Waste Report

(a) Respondent Burden

The annual respondent burden estimate for the 2007 Hazardous Waste Report (EPA ICR Number 0976.13) was 267,974 hours, with a total cost of \$47,713 for capital/start-up and O&M. The annual respondent burden estimate for the 2009 Hazardous Waste Report is 169,780 hours, with a total cost of \$26,787 for capital/start-up and O&M. This represents a decrease of 98,194 hours and \$20,926 in total cost for capital/start-up and O&M.

This decrease in burden for respondents has occurred for two primary reasons. First, there was a decrease in the annualized number of respondents, from 12,619 projected for 2007 to 8,242 projected for 2009. Second, there was a decrease in the number of Hazardous Waste Report forms projected for 2007 versus the number of forms projected for 2009. Table 14 compares the projected number of forms for the 2007 and the 2009 Hazardous Waste Reports.

Table 14
Comparison of Projected Number of Forms
for the 2007 and 2009 Hazardous Waste Report

Hazardous Waste Report Form	Projected Number of Forms		Difference ^a
	2007 Hazardous Waste Report	2009 Hazardous Waste Report	
Site Identification (Site ID) Form	25,238	16,483	-8,755
Form GM - Generation and Management	254,660	205,994	-48,666
Form WR - Waste Received from Offsite	851,540	861,640	10,100
Total	1,131,438	1,084,117	-47,321

^a Negative value indicates a decrease in the number of forms.

(b) State Agency Burden

The annual State agency burden estimate for the 2007 Hazardous Waste Report (EPA ICR Number 0976.13) was 417,222 hours, with a total cost of \$18,929 for capital/start-up and O&M. The annual State agency burden estimate for the 2009 Hazardous Waste Report is 215,828 hours, with a total cost of \$17,061 for capital/start-up and O&M. This represents a decrease of 201,394 hours and \$1,868 in total cost for capital/start-up and O&M.

This decrease in burden for State agencies has occurred because there was a decrease in the number of respondents and Hazardous Waste Report forms projected for 2007 versus the number of forms projected for 2009. Refer to Table 14 for a comparison of the projected number of forms for the 2007 and the 2009 Hazardous Waste Reports.

6(g) PUBLIC BURDEN STATEMENT

(1) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

The average annual public reporting burden associated with hazardous secondary material notification requirements is estimated to be approximately 1.36 hours. This includes time to notify EPA under section 260.42. There are no recordkeeping requirements associated with hazardous secondary material notification requirements, and as such, there is no recordkeeping burden.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

The average annual public reporting burden associated with RCRA Section 3010 notification requirements (initial and subsequent) is estimated to be approximately 0.74 hour. This includes time for reading the Site ID Form instructions, completing the form, and

submitting the form. There are no recordkeeping requirements associated with the RCRA Section 3010 notification requirements, and as such, there is no recordkeeping burden.

(c) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

The average annual public reporting burden associated with notification requirements under 40 CFR Part 262, Subpart K is estimated to be 0.67 hour per respondent. This includes time for preparing and submitting a Site ID Form to opt into or withdraw from Subpart K.

The average annual public recordkeeping burden associated with notification requirements under 40 CFR Part 262, Subpart K is estimated to be 0.08 hour per respondent. This includes time for keeping copies of notification and affiliation agreements on-site.

(d) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

The average annual public reporting burden associated with 40 CFR Part 273, Subpart C notification requirements (initial and subsequent) is estimated to be approximately 0.82 hour. This includes time for reading the Site ID Form instructions or applicable regulations, completing the Site ID Form or preparing a letter requesting an EPA Identification Number, and submitting the completed Site ID Form or letter. There are no recordkeeping requirements associated with the 40 CFR Part 273, Subpart C notification requirements, and as such, there is no recordkeeping burden.

(e) Notification of Used Oil Activity under 40 CFR Part 279

The average annual public reporting burden associated with 40 CFR Part 279 notification requirements (initial and subsequent) is estimated to be approximately 0.75 hour. This includes time for reading the Site ID Form instructions or applicable regulations, completing the Site ID Form or preparing a letter requesting an EPA Identification Number, and submitting the completed Site ID Form or letter. There are no recordkeeping requirements associated with the 40 CFR Part 279 notification requirements, and as such, there is no recordkeeping burden.

(2) Hazardous Waste Report

The reporting burden is estimated to average 16.63 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 3.97 hours per response and includes the time for filing and storing the Hazardous Waste Report submission for three years.

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 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.

To comment on EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2008-0912, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2008-0912 and OMB Control Number 2050-0024 in any correspondence.

EXHIBIT 1-a
NOTIFICATION OF REGULATED WASTE ACTIVITY
ESTIMATED ANNUAL PRIVATE-SECTOR RESPONDENT HOUR AND COST BURDEN

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$118.68/ Year	Mgr. \$70.15/ Year	Tech. \$52.26/ Year	Cler. \$31.44/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.08	1.01	0.08	1.17	\$60.65	\$0.00	\$3.25	1,601	1,865.17	\$102,303.90
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.08	1.01	0.08	1.17	\$60.65	\$0.00	\$3.25	216	251.64	\$13,802.40
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	80	53.20	\$3,021.60
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,170.01	\$119,127.90
Notification of Hazardous Waste Activity under RCRA Section 3010											
Initial Notification											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	8,368	8,368.00	\$462,583.04
Subsequent Notification											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	34,006	22,613.99	\$1,284,406.62
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	30,981.99	\$1,746,989.66
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
Eligible Academic Entities											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	26	17.29	\$982.02
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	26	2.08	\$65.52
Teaching Hospitals											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	1	0.08	\$2.52
Non-Profit Research Institutes											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	1	0.08	\$2.52
Withdrawal from 40 CFR Part 262, Subpart K											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	0	0.00	\$0.00
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.53	\$1,052.58
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
EPA Form 8700-12											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	22	22.00	\$1,216.16
Letter											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	7	3.50	\$204.05
Subsequent Notification											
EPA Form 8700-12											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	6	3.99	\$226.62
Letter											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	2	1.00	\$58.30
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	30.49	\$1,705.13
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
EPA Form 8700-12											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	82	82.00	\$4,532.96
Letter											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	27	13.50	\$787.05
Subsequent Notification											
EPA Form 8700-12											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	92	61.18	\$3,474.84
Letter											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	30	15.00	\$874.50
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	171.68	\$9,669.35
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	33,374	\$1,878,545

**EXHIBIT 1-b
NOTIFICATION OF REGULATED WASTE ACTIVITY
ESTIMATED ANNUAL STATE AND LOCAL GOVERNMENT RESPONDENT HOUR AND COST BURDEN**

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$118.68/ Year	Mgr. \$70.15/ Year	Tech. \$52.26/ Year	Cler. \$31.44/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.08	1.01	0.08	1.17	\$60.65	\$0.00	\$3.25	111	129.32	\$7,092.90
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.08	1.01	0.08	1.17	\$60.65	\$0.00	\$3.25	15	17.48	\$958.50
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	6	3.99	\$226.62
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	150.79	\$8,278.02
Notification of Hazardous Waste Activity under RCRA Section 3010											
Initial Notification											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	1,888	1,888.00	\$104,368.64
Subsequent Notification											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	1,637	1,088.61	\$61,829.49
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,976.61	\$166,198.13
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	11	7.32	\$415.47
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	11	0.88	\$27.72
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	1	0.08	\$2.52
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 262, Subpart K											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	0	0.00	\$0.00
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	8.28	\$445.71
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	4	4.00	\$221.12
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	2	1.00	\$58.30
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	1	0.67	\$37.77
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	5.67	\$317.19
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$52.03	\$0.00	\$3.25	6	6.00	\$331.68
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	2	1.00	\$58.30
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$34.52	\$0.00	\$3.25	3	2.00	\$113.31
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$25.90	\$0.00	\$3.25	1	0.50	\$29.15
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	9.50	\$532.44
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	3,151	\$175,771

EXHIBIT 2-A
 2009 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL PRIVATE-SECTOR RESPONDENT HOUR AND COST BURDEN

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$118.68/ Year	Mgr. \$70.15/ Year	Tech. \$52.26/ Year	Cler. \$31.44/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
Hazardous Waste Report											
Read the Hazardous Waste Report instructions	0.00	1.00	1.00	0.00	2.00	\$122.41	\$0.00	\$0.00	7,568	15,136.00	\$926,399
Gather information and prepare Site Identification Form	0.00	0.08	0.40	0.08	0.56	\$29.03	\$0.00	\$0.00	7,568	4,238.08	\$219,699
Gather information and prepare Form GM	0.00	0.10	0.47	0.04	0.61	\$32.83	\$0.00	\$0.00	94,561	57,681.91	\$3,104,421
Gather information and prepare Form WR	0.00	0.00	0.12	0.04	0.16	\$7.53	\$0.00	\$0.00	423,986	67,837.76	\$3,192,615
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0
Submit report to the State or Regional EPA Office	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$3.25	7,568	605.44	\$43,667
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$1.15	\$0.00	\$0.00	526,115	15,783.44	\$605,032
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	161,282.63	\$8,091,833

EXHIBIT 2-b
 2009 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL STATE AND LOCAL GOVERNMENT RESPONDENT HOUR AND COST BURDEN

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$118.68/ Year	Mgr. \$70.15/ Year	Tech. \$52.26/ Year	Cler. \$31.44/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
Hazardous Waste Report											
Read the Hazardous Waste Report instructions	0.00	1.00	1.00	0.00	2.00	\$122.41	\$0.00	\$0.00	674	1,347.00	\$82,443
Gather information and prepare Site Identification Form	0.00	0.08	0.40	0.08	0.56	\$29.03	\$0.00	\$0.00	674	377.16	\$19,552
Gather information and prepare Form GM	0.00	0.10	0.47	0.04	0.61	\$32.83	\$0.00	\$0.00	8,437	5,146.27	\$276,970
Gather information and prepare Form WR	0.00	0.00	0.12	0.04	0.16	\$7.53	\$0.00	\$0.00	6,834	1,093.44	\$51,460
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0
Submit report to the State or Regional EPA Office	0.00	0.00	0.00	0.08	0.08	\$2.52	\$0.00	\$3.25	674	53.88	\$3,886
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$1.15	\$0.00	\$0.00	15,944	478.32	\$18,336
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	8,496.07	\$452,647

EXHIBIT 3
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$85.28/ Year	Mgr. \$75.25/ Year	Tech. \$54.14/ Year	Cler. \$23.09/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Notification prior to operating under exclusion(s)											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	1,712	428.00	\$23,180.48
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	1,712	3,852.00	\$195,253.60
Notification by March 1 of each even numbered year thereafter											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	231	57.75	\$3,127.74
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	231	519.75	\$26,345.55
Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	86	21.50	\$1,164.44
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	86	193.50	\$9,808.30
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	5,072.50	\$258,880.11
Notification of Hazardous Waste Activity under RCRA Section 3010											
Initial Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	10,256	2,564.00	\$138,866.24
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	10,256	23,076.00	\$1,169,696.80
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.55	\$0.00	\$0.45	10,256	5,128.00	\$123,072.00
Subsequent Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	35,643	8,910.75	\$482,606.22
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	35,643	80,196.75	\$4,065,084.15
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	119,875.50	\$5,979,325.41
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	37	9.25	\$500.98
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	37	83.25	\$4,219.85
Withdrawal from 40 CFR Part 262, Subpart K											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	92.50	\$4,720.83

^a Exhibit includes rounding.

EXHIBIT 3 (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$0.00/ Year	Mgr. \$0.00/ Year	Tech. \$0.00/ Year	Cler. \$0.00/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	26	6.50	\$352.04
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	26	58.50	\$2,965.30
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.55	\$0.00	\$0.45	26	13.00	\$312.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	9	2.25	\$121.86
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	9	20.25	\$1,026.45
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.55	\$0.00	\$0.45	9	4.50	\$108.00
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	7	1.75	\$94.78
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	7	15.75	\$798.35
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	2	0.50	\$27.08
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	2	4.50	\$228.10
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	127.50	\$6,033.96
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	88	22.00	\$1,191.52
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	88	198.00	\$10,036.40
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.55	\$0.00	\$0.45	88	44.00	\$1,056.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	29	7.25	\$392.66
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	29	65.25	\$3,307.45
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.55	\$0.00	\$0.45	29	14.50	\$348.00
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	95	23.75	\$1,286.30
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	95	213.75	\$10,834.75
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.54	\$0.00	\$0.00	31	7.75	\$419.74
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$114.05	\$0.00	\$0.00	31	69.75	\$3,535.55
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	666.00	\$32,408.37
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	125,834	\$6,281,369

^a Exhibit includes rounding.

EXHIBIT 4
2009 HAZARDOUS WASTE REPORT
ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$85.28/ Year	Mgr. \$75.25/ Year	Tech. \$54.14/ Year	Cler. \$23.09/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Hazardous Waste Report											
Develop Hazardous Waste Report forms and instructions	0.00	8.00	80.00	20.00	108.00	\$5,395.00	\$0.00	\$20,000.00	0.50	54.00	\$12,697.50
Distribute Hazardous Waste Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$25.83	\$0.00	\$0.00	50	38.00	\$1,291.50
Develop computer capabilities required to compile national data	0.00	8.00	80.00	0.00	88.00	\$4,933.20	\$0.00	\$250,000.00	0.50	44.00	\$127,466.60
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$39.37	\$0.00	\$0.00	50	50.50	\$1,968.50
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$10.86	\$0.00	\$0.00	29	9.86	\$314.94
Perform quality assurance	0.00	0.02	0.16	0.16	0.34	\$13.56	\$0.00	\$0.00	150	50.40	\$2,034.00
Prepare the National Report	0.00	8.00	200.00	40.00	248.00	\$12,353.60	\$0.00	\$50,000.00	0.50	124.00	\$31,176.80
Store the data	0.00	0.00	80.00	0.00	80.00	\$4,331.20	\$0.00	\$35,000.00	0.50	40.00	\$19,665.60
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	411	\$196,615

^a Exhibit includes rounding.

EXHIBIT 5
2009 HAZARDOUS WASTE REPORT
ESTIMATED ANNUAL STATE AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$57.43/ Year	Mgr. \$53.91/ Year	Tech. \$32.26/ Year	Cler. \$20.58/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Hazardous Waste Report											
Distribute and collect Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$18.89	\$0.00	\$2.07	8,242	6,263.92	\$172,752.32
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$26.96	\$0.00	\$0.00	8,242	8,324.42	\$222,204.32
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$8.26	\$0.00	\$0.00	56,199	19,107.66	\$464,203.74
Perform quality assurance	0.00	0.02	0.16	0.16	0.34	\$9.32	\$0.00	\$0.00	542,059	182,131.82	\$5,051,989.88
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	215,828	\$5,911,150

^a Exhibit includes rounding.

EXHIBIT 6**NOTIFICATION OF REGULATED WASTE ACTIVITY AND 2009 HAZARDOUS WASTE REPORT
TOTAL ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN SUMMARY ^a**

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
Notification of Regulated Waste Activity (Exhibits 1-a and 1-b)	36,525	\$1,897,497	\$0	\$156,819	\$2,054,316
Hazardous Waste Report - Respondents (Exhibits 2-a and 2-b)	169,780	\$8,517,772	\$0	\$26,787	\$8,544,559
TOTAL	206,305	\$10,415,269	\$0	\$183,606	\$10,598,875

^a Exhibit includes rounding.**EXHIBIT 7****NOTIFICATION OF REGULATED WASTE ACTIVITY AND 2009 HAZARDOUS WASTE REPORT
TOTAL ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN SUMMARY ^a**

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
Notification of Regulated Waste Activity (Exhibit 3)	125,834	\$6,276,685	\$0	\$4,684	\$6,281,369
Hazardous Waste Report (Exhibit 4)	411	\$19,115	\$0	\$177,500	\$196,615
TOTAL	126,245	\$6,295,801	\$0	\$182,184	\$6,477,984

EXHIBIT 8**NOTIFICATION OF REGULATED WASTE ACTIVITY AND 2009 HAZARDOUS WASTE REPORT
TOTAL ESTIMATED ANNUAL STATE AGENCY HOUR AND COST BURDEN SUMMARY ^a**

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
Hazardous Waste Report (Exhibit 5)	215,828	\$5,894,089	\$0	\$17,061	\$5,911,150
TOTAL	215,828	\$5,894,089	\$0	\$17,061	\$5,911,150

^a Exhibit includes rounding.