

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 2308.02**

Revisions to the Requirements for Transboundary Shipments of Wastes between OECD Countries, the Requirements for Export Shipments of Spent Lead Acid Batteries, the Requirements on Submitting Exception Reports for Export Shipments of Hazardous Wastes, and the Requirements for Imports of Hazardous Wastes

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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 "Revisions to: the Requirements for Transboundary Shipments of Wastes between OECD Countries, the Requirements for Export Shipments of Spent Lead Acid Batteries, the Requirements on Submitting Exception Reports for Export Shipments of Hazardous Wastes, and the Requirements for Imports of Hazardous Wastes (Final Rule)" EPA ICR Number 2308.02.

### **1(b) Short Characterization**

The U. S. Environmental Protection Agency (EPA) is promulgating a final action to amend the existing regulations governing shipments (export/import/transit) of hazardous wastes destined for recovery between the U.S. and the Organization for Economic Cooperation and Development (OECD) countries. The action integrates into the Code of Federal Regulations (CFR) various OECD Council Decisions<sup>1</sup> revising the rules governing transboundary movement of hazardous wastes among OECD countries, which the U.S, as a signing party, is obligated to implement. In order to implement this legally-binding obligation, EPA is taking action to amend the existing regulations at 40 CFR 262, subpart H. EPA is also taking this opportunity to make technical corrections and clarifications to the regulations at 40 CFR part 262; §262.10(d); §262.58(a); §262.58(b); §263.10(d); §264.12(a)(2); and §265.12(a)(2). The Agency's regulatory changes do not increase the scope of hazardous wastes subject to U.S. export and import controls. However, they modify the procedural controls governing U.S. export and import of hazardous waste shipped for recovery operations among OECD Member countries (except for Canada and Mexico). Hazardous waste shipments to Canada and Mexico will continue to move under the current bilateral agreements and regulations.

As part of this final action, EPA is also regulating exports of Spent Lead-Acid Batteries (SLAB) to OECD countries (except for Canada and Mexico) under the same rule above (40 CFR 262, subpart H) while regulating SLAB exports to non-OECD countries (including Canada and Mexico) under 40 CFR 262, subpart E requirements. (Currently, SLABs are exempt from any export requirements when managed under 40 CFR 266 subpart G ("SLAB Regulations"). SLABs may also be managed as Universal Wastes under 40 CFR 273 ("Universal Waste Regulations") under which specific export requirements apply; however, very few exporters have chosen to do so.) Specifically, exporters of SLABs destined for reclamation in one of the OECD Member countries listed in § 262.58(a)(1) would be required to comply with the Amber control procedures in §262.83. Under the Amber control procedures, an exporter must submit a complete notification of its intent to export to EPA at least 45 days before the export is scheduled to leave the United States (or at least ten days if the shipment is going to a pre-approved

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<sup>1</sup> OECD's "Decision of the Council C(2001)107/FINAL, Concerning the Control of Transboundary Movements of Wastes Destined for Recovery Operations, as amended by C(2004)20" (hereinafter referred to as the Amended 2001 OECD Decision), which amended the OECD Decision (1992) on the same subject.

facility in the country of import). Exporters of SLABs destined for reclamation in countries not listed in §262.58(a)(1) would be required to comply with the primary exporter notification requirements in §262.53, and export the SLABs only upon consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in 40 CFR part 262, subpart E.

Also incorporated into this action is a requirement for documentation necessary to confirm EPA's consent to import. Specifically, U.S. receiving facilities must match EPA-provided import consent documentation to incoming hazardous waste import shipments and submit to EPA a copy of the relevant import consent documentation (along with a copy of the RCRA hazardous waste manifest currently required) within thirty days of each import shipment delivery. These changes modify the language in §264.71(a)(3), and §265.71(a)(3).

Finally, this action revises the current language in §262.55 and §262.87(b) to specify that exception reports be submitted directly to the Director, International Compliance and Assurance Division (ICAD), of the Office of Enforcement and Compliance Assurance (OECA), EPA Headquarters, rather than to the EPA "Administrator."

## ***REGULATORY CHANGES/AMENDMENTS***

### **A. Changes to 40 CFR part 262, subpart E**

The final rule amends the exception reporting requirements in §262.55 to specify that all exception reports be submitted to the Office of Enforcement and Compliance Assurance's Office of Federal Activities in Washington, D.C. rather than to the Administrator. In addition, the rule updates §262.10(d) and §262.58(a) to reflect that export shipments of SLABs being managed under 40 CFR part 266, subpart G that are destined for recovery in one of the OECD Member countries listed in §262.58(a)(1) are subject to the requirements of subpart H. Finally, the rule adds language in §262.58(b) of subpart E to clarify that hazardous waste exports subject to subpart E and hazardous waste imports subject to subpart F are not subject to subpart H in order to reduce confusion for U.S. exporters and importers.

### **B. Changes to 40 CFR part 262, subpart H**

All but the last three of the changes listed below are necessary to conform to the revisions in the Amended 2001 OECD Decision. These changes range from substantive revisions and amendments to changes in terminology to simple editorial changes. Collectively, these changes serve to implement the Amended 2001 OECD Decision, as well as clarify certain sections that were previously ambiguous to the regulated community. Changes to 40 CFR part 262, subpart H include the following:

#### **(1) Changes in terminology**

The final rule adopts several terms and definitions updated in the Amended 2001 OECD Decision to limit any unnecessary confusion between the U.S. regulations and those of other OECD Member countries and to promote consistency with the Amended 2001 OECD Decision.

**(2) The number of different levels of control reduced from three (Green, Amber, and Red) to two (Green, Amber) and the waste lists updated**

Both the Green and Amber waste lists are cited in §262.89. The final rule amends §262.89(d) to incorporate by reference the most current OECD waste lists from the Amended 2001 OECD Decision. All wastes formerly appearing on the Red list will be subject to the Amber control procedures.

**(3) References to unlisted wastes eliminated in favor of “wastes not covered in Appendices 3 and 4 of the OECD Decision”**

The rule replaces the term “unlisted wastes” currently used in §262.83(d) with “wastes not covered in Appendices 3 and 4 of the OECD Decision,” so that wastes not on these lists are not subject to the Amber control procedures. The rule also renumbers §262.83(d) to §262.83(c) since the current §262.83(c) addresses “red-list wastes” and is no longer needed.

**(4) Transboundary movements may now qualify for a laboratory analysis exemption**

The final §262.82(g) allows for waste samples that are sent for laboratory analyses to be exempt from the Amber control procedures provided they meet the same conditions as set forth in the Amended 2001 OECD Decision. Such analytical samples must still be appropriately packaged and labeled.

**(5) Recovery facilities must submit a certificate of recovery**

The final rule incorporates the certificate recovery provisions of the Amended 2001 OECD Decision in §262.83(e) (while the current §262.83(e) on notification requirements is renumbered to §262.83(d), as addressed below). The final rule requires that the recovery facility must send copies of the certificate of recovery to the exporter and competent authorities of the countries of export and import by mail, e-mail followed by mail, or fax followed by mail.

**(6) Amendments to notification requirements**

The final rule amends §262.83(e) (and renumbers to §262.83(d)) by incorporating several new OECD notification requirements, including: exporter and importing recovery facility e-mail address; e-mail address for importer (if different from the importing recovery facility); address,

telephone, fax, and e-mail address of intended transporter(s); means of transport envisioned; and specification of the type of recovery operation(s) that will be used, according to §262.81.

**(7) The consideration period for transboundary movements to pre-approved facilities has been reduced and the allowable notice coverage period has been increased**

The final rule amends §262.83(b)(2)(ii) to reflect the Amended 2001 OECD Decision to reduce the consideration period to seven (7) working days, which can be extended to thirty (30) days by the competent authority in exceptional cases. The final rule also amends §262.83(b)(2)(i) to reflect the Amended 2001 OECD Decision to increase the allowable notice coverage period for general notifications to three (3) years.

**(8) New procedures for the pretreatment of hazardous wastes at R12/R13 recovery facilities**

The final rule incorporates the new requirements imposed by the Amended 2001 OECD Decision for transboundary movements of wastes destined for R12 and R13 recovery operations (transfer and accumulation, respectively)<sup>2</sup> in §262.82(f).

**(9) New provisions regarding mixtures of hazardous wastes**

The final rule revises the text in §262.82(a) to clarify that only those wastes and waste mixtures considered hazardous under U.S. national regulations will be subject to the Amber control procedures within the United States.

**(10) New provisions regarding the return and re-export of hazardous wastes subject to the Amber control procedures**

The final rule sets forth the re-export and return provisions of the Amended 2001 OECD Decision in §§262.82(c), 262.82(d), and 262.82(e), on measures to be taken in case a transboundary movement of hazardous waste that is subject to the Amber control procedures cannot be completed as intended.

**(11) SLABs are now covered by EPA's OECD rule**

The final rule updates §262.80(a) to reflect that export shipments of SLABs being managed under 40 CFR part 266, subpart G that are destined for recovery in one of the OECD countries listed in §262.58(a)(1) are subject to 40 CFR part 262, subpart H.

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<sup>2</sup> R12 is defined in §262.81 as exchange of wastes for submission to any of the operations numbered R1-R11. R13 is defined in §262.81 as accumulation of material intended for any operation numbered R1-R12.

**(12) Technical Corrections to EPA’s OECD rule**

The final rule makes several technical corrections to EPA’s current OECD rule, including corrections to capitalization, syntax, and punctuation errors. In these changes, EPA is not making any substantive revisions, but is seeking to eliminate any confusion on the part of the regulated community by striving for consistency both within the regulations and with the terms of the Amended 2001 OECD Decision.

**(13) Change to the submittal address for exception reports**

The final rule amends the exception reporting requirements in §262.87(b) to specify that all exception reports are to be submitted to the Office of Enforcement and Compliance Assurance’s Office of Federal Activities in Washington, D.C. rather than the Administrator.

**C. Changes to 40 CFR 263.10(d)**

The final rule updates §263.10(d) to reflect that export shipments of SLABs being managed under 40 CFR part 266, subpart G that are destined for recovery in one of the OECD countries listed in §262.58(a)(1) are subject to 40 CFR part 262, subpart H.

**D. Changes to 40 CFR 264.12(a)(2) and 40 CFR 265.12(a)(2)**

The final rule amends §§264.12(a)(2) and 265.12(a)(2) by, among other things, requiring owners or operators of recovery facilities to submit a certificate of recovery as soon as possible after the recovery is completed, but no later than thirty (30) days after the completion of recovery and no later than one (1) calendar year following the receipt of the hazardous waste.

**E. Changes to 40 CFR 264.71 and 40 CFR 265.71**

The final rule amends §§264.71(a)(3) and 265.71(a)(3) by requiring owners or operators of facilities receiving imported hazardous wastes to submit to EPA the written documentation of EPA’s consent to the import along with a copy of the RCRA hazardous waste manifest for the shipment that they are currently required to submit to EPA within thirty (30) days of shipment delivery. This will enable EPA to match the individual shipment manifest to the consent for an annual notice from a foreign exporter. In addition, the rule also updates §§264.71(d) and 265.71(d) to reflect the current address for the Office of Enforcement and Compliance Assurance’s Office of Federal Activities in Washington, D.C.

**F. Changes to 40 CFR 266.80(a)**

The existing regulations at 40 CFR part 266, subpart G, “Spent Lead-Acid Batteries Being Reclaimed,” exempt exporters of SLABs destined for reclamation from



the export requirements of 40 CFR part 262. EPA is amending the table located at §266.80 by including two additional rows to the current table. These additional rows will effectively require that exporters and transporters of SLABs being sent to a foreign country for reclamation will need to meet the universal waste requirements concerning the export of SLABs for reclamation. Specifically, exporters will need to either comply with the requirements in 40 CFR part 262, subpart H when the shipments are destined to one of the OECD Member countries listed in §262.58(a)(1), or with relevant requirements in 40 CFR part 262, subpart E when the shipments are destined for any country not listed in §262.58(a)(1).

### **G. Changes to 40 CFR 271.1**

This final rule amends Table 1 and Table 2 of §271.1 by adding references to the revisions which amend 40 CFR part 262, subpart E to reflect that subpart E implements the Hazardous and Solid Waste Amendments of 1984.

## **2. NEED FOR AND USE OF THE COLLECTION**

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

EPA is promulgating the above regulatory changes/amendments under the authority of Sections 1006, 1007, 2002(a), 3001-3010, 3013-3015, and 3017 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), and as amended by the Hazardous and Solid Waste Amendments, 42 U.S.C. 6905, 6906, 6912, 6921-6930, 6934, and 6938.

The final rule is intended to implement the Amended 2001 OECD Decision, which amended the OECD Decision (1992)<sup>3</sup> on the same subject. The purpose of these revisions was to encourage consistency and harmonization between the OECD and the Basel Convention,<sup>4</sup> which in turn, promotes economic efficiency and the recovery of

<sup>3</sup> On March 30, 1992, the OECD Council adopted the “Decision of the Council C(92)39/FINAL Concerning the Control of Transfrontier Movements of Wastes Destined for Recovery” (hereinafter referred to as the 1992 Decision), which applied to the transboundary movements of wastes destined for recovery operations between OECD Member countries. The 1992 Decision provided a framework for OECD Member countries to control the transboundary movement of recoverable wastes in an environmentally sound and economically efficient manner. Due to the legally binding nature of the 1992 Decision, the United States, as an OECD Member country, was required to implement the terms of the decision in accordance with Articles 5(a) and 6(2) of the OECD Convention. In order to implement the specific provisions of the 1992 Decision, EPA published a final rule in the FEDERAL REGISTER entitled “Imports and Exports of Hazardous Waste: Implementation of OECD Council Decision C(92)39 Concerning the Control of Transfrontier Movements of Wastes Destined for Recovery Operations” (61 FR 16289, April 12, 1996)(hereafter referred to as EPA’s OECD rule). These regulations appear primarily in 40 CFR part 262, subpart H.

<sup>4</sup> The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal is a comprehensive global environmental agreement on hazardous and other wastes. The Convention has 172 Member countries, also known as Parties, and aims to protect human health and the environment against the adverse effects resulting from the generation, management, transboundary

waste in an environmentally sound manner.

The Amended 2001 OECD Decision was supported by the United States and imposes legally binding commitments on the United States pursuant to Articles 5(a) and 6 of the OECD Convention. By consenting to the Decision, the United States Government has agreed to promulgate regulations necessary to ensure that the United States can uphold the agreement.

## **2(b) Practical Utility and Users of the Data**

The Office of Enforcement and Compliance Assurance, U.S. EPA, uses the information provided by each U.S. exporter, U.S. importer, and U.S. receiving facility to determine compliance with the applicable RCRA regulatory provisions. In addition, the information is used to determine the number, origin, destination, and type of exports from and imports to the U.S. for tracking purposes and for reporting to the OECD. This information also is used to assess the efficiency of the program.

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

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

Except as described below, the OECD Decision does not result in the collection of duplicate data. Although some of the information required for the hazardous waste manifest and the movement document is substantively the same, up to six pieces of additional information are required for the movement document. In addition, these two documents serve different purposes. A signed copy of the hazardous waste manifest, which is not valid beyond U.S. borders, is dropped off at the U.S. Customs check point when the shipment leaves the U.S. to verify pertinent information, including point of departure, date, destination, and contents of the shipment. The movement document must accompany the shipment until it reaches the foreign recovery facility. The signed movement document is subsequently returned to EPA and the U.S. exporter to acknowledge receipt of the shipment in accordance with the OECD Decision.

In certain cases, some of the information on the tracking document also may be collected by the Department of Commerce in its Census Bureau form titled "Shipper's Export Declaration" (15 CFR Part 30). This form, which is required for all shipments that have a value in excess of \$2,500, must be filed at the U.S. port of exit, similar to the current export requirements. However, the information contained in the Census Bureau's form is not adequate for EPA's purpose of tracking and identifying the export of

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movements and disposal of hazardous and other wastes. More information on the Basel Convention may be found at [www.basel.int](http://www.basel.int).

hazardous waste from the U.S. For example, the wastes are identified by tariff codes that are less precise than the waste codes required by the tracking document.

Because the OECD Decision applies only to hazardous waste destined for recovery, it is likely that some of the wastes may have a value in excess of \$2,500. EPA believes that the economic interest served by allowing recovery operations to continue within the OECD and the interest in protecting human health and the environment served by the tracking document outweigh the potential minor costs to a small number of exporters that may have to complete the Census Bureau form in addition to the tracking document.

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

Under the Paperwork Reduction Act of 1995, EPA requested public comments on the information collection provisions of the proposed rule published in the Federal Register on October 6, 2008 (73 FR 58388). Comments had to be received by OMB on or before November 5, 2008. No comments on the information collection provisions were submitted.

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

As noted previously, OECD Council Decisions are international agreements that create binding commitments on the United States, unless otherwise provided in the Articles to the 1960 Convention. Therefore, by consenting to the Amended 2001 OECD Decision, the United States Government has agreed to establish legal measures necessary to ensure that the United States can uphold the agreement. EPA believes that RCRA contains adequate authority to promulgate the requirements of the Amended 2001 OECD Decision.

EPA consulted with industry concerning OECD imports and exports in July 2004 and consulted with industry concerning SLAB recycling and export shipments in 1998. See Appendix A in “September 1998 Industry Study.pdf,” and “Consultation Telephone Logs\_092704.pdf” available in the public docket for this rulemaking.

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

EPA has carefully considered the burden imposed upon the regulated community by the final regulatory changes/amendments other than those required to implement the legally binding obligation of the Amended 2001 OECD Decision. EPA is confident that the activities required of respondents are necessary, and to the extent possible, has attempted to minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the regulations are not met, EPA can not ensure that hazardous wastes are properly managed and do not pose a serious threat to human health and the environment.

### 3(e) General Guidelines

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, OMB's Information Collection Review Handbook, and other applicable OMB guidance.

### 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. However, the Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the final rule. If such a claim were asserted, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

### 3(g) Sensitive Questions

No questions of a sensitive nature are included in the information collection requirements associated with the final rule.

## 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

### 4(a) Respondents and SIC/NAICS Codes

#### OECD Revisions

The OECD revisions in this final rule affect all persons who export or import hazardous waste, export or import universal waste, or export spent lead-acid batteries (SLABs) destined for recovery operations in countries belonging to the Organization for Economic Cooperation and Development (OECD), except for Mexico and Canada. Any transboundary movement of hazardous wastes between the United States and either Mexico or Canada will continue to be regulated by their respective bilateral agreements and applicable regulations. Potentially affected entities may include, but are not limited to:

Industry Sector	NAICS	SIC
Utilities	221100	4939
Petroleum and Coal Products Manufacturing	324	29
Chemical Manufacturing	325100	28
Primary Metal Manufacturing	331	33
Fabricated Metal Product Manufacturing	332	34
Machinery Manufacturing	333	35
Computer and Electronic Product Manufacturing	334110	357

<b>Industry Sector</b>	<b>NAICS</b>	<b>SIC</b>
Electrical Equipment, Appliance, and Component Manufacturing	335	36
Transportation Equipment Manufacturing	336	37
Miscellaneous Manufacturing	339900	39
Scrap and Waste Materials	423930	5093
Materials Recovery Facilities	562920	4953

### **SLAB Revisions**

The SLAB revisions in this final rule affect all persons who export SLABs for reclamation in any foreign country. Potentially affected entities may include, but are not limited to:

<b>Industry Sector</b>	<b>NAICS</b>	<b>SIC</b>
Hazardous Waste Collectors	562112	4212
Recyclable Material Hauling, Long-Distance	484230	4213
Batteries, automotive, merchant wholesalers	423120	5013
Lead-acid storage batteries, manufacturing	335911	3691
Automotive Parts, Accessories, and Tire Stores	441310	5013
Tire Dealers	441320	5014
All other General Merchandise Stores	452990	5399
New Car Dealers	441110	5511
Recyclable Material Wholesaler	423930	5093
Other Waste Collection	562119	4212
Recyclable Material Collection Services, Solid Waste Collection	562111	4212
Marinas	713930	4493
General Freight Trucking, Long-Distance, TL	484121	4213
General Freight Trucking, Long-Distance, LTL	484122	4213
Specialized Freight Trucking	484200	4213
Freight Carriers (except air couriers), Air Scheduled	481112	4512
Freight Charter Services, Air	481212	4522
Freight Railways, Line-Haul	482111	4011
Freight Transportation, Deep Sea, to and from Domestic Ports	483113	4424
Freight Transportation, Deep Sea, to or from Foreign Ports	483111	4412

**Exception Report Revisions for Exports under subparts E and H of 40 CFR part 262**

The exception report change to 40 CFR part 262, subpart E and subpart H of this final rule affect all persons who export hazardous waste, universal waste, or SLABs to any foreign country. Potentially affected entities may include, but are not limited to:

<b>Industry Sector</b>	<b>NAICS</b>	<b>SIC</b>
Utilities	221100	4939
Petroleum and Coal Products Manufacturing	324	29
Chemical Manufacturing	325100	28
Primary Metal Manufacturing	331	33
Fabricated Metal Product Manufacturing	332	34
Machinery Manufacturing	333	35
Computer and Electronic Product Manufacturing	334110	357
Electrical Equipment, Appliance, and Component Manufacturing	335	36
Transportation Equipment Manufacturing	336	37
Miscellaneous Manufacturing	339	39
Scrap and Waste Materials	423930	5093

**Import Consent Documentation**

The import revisions in this final rule affect all facilities receiving imported hazardous waste from a foreign country that must comply with either §264.71(a)(3) or §265.71(a)(3). This includes those hazardous waste import shipments originating in OECD countries, as well as in non-OECD countries. Potentially affected entities may include, but are not limited to:

<b>Industry Sector</b>	<b>NAICS</b>	<b>SIC</b>
Hazardous Waste Collectors	562112	4212
Recyclable Material Wholesaler	423930	5093
Other Waste Collection	562119	4212
Recyclable Material Collection Services, Solid Waste Collection	562111	4212
Scrap and Waste Materials	423930	5093
Materials Recovery Facilities	562920	4953

The lists of potentially affected entities in the above tables may not be exhaustive. The Agency's aim is to provide a guide for readers regarding those entities that potentially could be affected by this action. However, this action may affect other entities not listed in these tables.

#### 4(b) Information Requested

##### OECD Revisions

Under the final §262.82(g), the transboundary movement of an Amber waste is exempt from the Amber control procedures if it is in certain quantities and destined for laboratory analysis to assess its physical or chemical characteristics, or to determine its suitability for recovery operations. The quantity of such waste shall be determined by the minimum quantity reasonably needed to perform the analysis in each particular case adequately, but in no case exceed twenty-five kilograms (25 kg). As a result, the affected entities will experience cost savings, since they will no longer need to comply with the information collection requirements under the existing regulations.

(i) Data Item:

- None

(ii) Respondent Activities:

- None

Under the final §262.83(e), recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. This certificate of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste.

(i) Data Item:

- A certificate of recovery by mail, e-mail without a digital signature followed by mail, or fax followed by mail.

(ii) Respondent Activities:

- Prepare and maintain a copy of the certificate of recovery for each hazardous waste shipment.

Under the final §262.82(f), the transboundary movement of wastes destined for R12 (exchange) and R13 (accumulation) operations must comply with all Amber control procedures for notification and consent as set forth in §262.83 and for the movement document as set forth in §262.84. Additional responsibilities of R12/R13 facilities include:

If wastes are destined for an R12/R13 recovery facility, exporters also must indicate in the notification the name, address, and telephone and telefax number

of the recovery facility or facilities where the subsequent R1-R11<sup>5</sup> recovery operation takes place or may take place.

Within three days of the receipt of the wastes by the R12/R13 recovery facility, the facility must return a signed copy of the movement/tracking document to the exporter and to the competent authorities of the countries of export and import. The facility must retain the original of the movement/tracking document for three years.

As soon as possible, but no later than 30 days after the completion of the R12/R13 recovery operation and no later than one calendar year following the receipt of the waste, the R12/R13 recovery facility must send a certificate of recovery to the exporter and to the competent authorities of the countries of export and import.

When an R12/R13 recovery facility delivers wastes for recovery to an R1-R11 recovery facility located in the country of import, it must obtain as soon as possible, but no later than one calendar year following delivery of the waste, a certification from the R1-R11 facility that recovery of the wastes at that facility has been completed. The R12/R13 facility must promptly transmit the applicable certification to the competent authorities of the countries of import and export, identifying the transboundary shipments to which the certification pertain.

When an R12/R13 recovery facility delivers wastes for recovery to an R1-R11 recovery facility located in the initial country of export or in a third country other than the initial country of export, a new notification is required.

(i) Data Item:

- Notification from the exporters indicating the foreseen recovery facility or facilities where the subsequent R1-R11 recovery operation takes place or may take place
- A signed copy of the movement/tracking document from the R12/R13 recovery facility to the exporter and to the competent authorities of the countries of export and import
- A certificate of recovery from the R12/R13 recovery facility to the exporter and to the competent authorities of the countries of export and import

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<sup>5</sup> Recovery operations R1 through R11 are defined in §262.81 as the following: R1, use as a fuel (other than in direct incineration) or other means to generate energy; R2, solvent reclamation/regeneration; R3, recycling/reclamation of organic substances which are not used as solvents; R4, recycling/reclamation of metals and metal compounds; R5, recycling/reclamation of other inorganic materials; R6, regeneration of acids or bases; R7, recovery of components used for pollution abatement; R8, recovery of components used from catalysts; R9, used oil re-refining or other reuses of previously used oil; R10, land treatment resulting in benefit to agriculture or ecological improvement; and, R11, uses of residual materials obtained from any of the operations numbered R1-R10.



- A certificate of recovery from the R1-R11 facility located in the country of import to the R12/R13 recovery facility
- A new notification when an R12/R13 recovery facility delivers wastes for recovery to an R1-R11 recovery facility located in the initial country of export or in a third country other than the initial country of export

(ii) Respondent Activities:

- Exporters must indicate in the notification the recovery facility where the subsequent R1-R11 recovery operation takes place or may take place.
- The R12/R13 recovery facility must return a signed copy of the movement/tracking document to the exporter and to the competent authorities of the countries of export and import. The facility must retain the original of the movement/tracking document for three years.
- After the completion of the R12/R13 recovery operation, the R12/R13 recovery facility must send a certificate of recovery to the exporter and to the competent authorities of the countries of export and import.
- When an R12/R13 recovery facility delivers wastes for recovery to an R1-R11 recovery facility located in the country of import, it must obtain a certificate of recovery from the R1-R11 facility. The R12/R13 facility must promptly transmit the certificate to the competent authorities of the countries of import and export.
- When an R12/R13 recovery facility delivers wastes for recovery to an R1-R11 recovery facility located in the initial country of export or in a third country other than the initial country of export, a new notification is required.

Under the final §262.82(c), §262.82(d), and §262.82(e), when a transboundary movement of wastes to which concerned OECD Countries have given consent cannot be completed as intended (e.g., not in accordance with the notification, consents given by the competent authorities, or the terms of the contract) and alternative arrangements cannot be made to recover these wastes in an environmentally sound manner in the U.S., the hazardous waste must be returned to the country of export or re-exported to a third country. The return of the hazardous waste to the country of export is to take place within ninety (90) days from the time when the country of export was informed of the incident, or such other period of time to which all concerned countries agree.

(i) Data Item:

- Notification to inform EPA of need to return shipment.

(iii) Respondent Activities:

- U.S. importer must prepare and submit notification to EPA of the need to return the shipment to the country of export.

**SLAB Revisions**

EPA is amending the RCRA regulations for SLABs specified in 40 CFR part 266 subpart G by requiring notification and consent for the export of SLABs. The final action prescribes specific export requirements for SLAB exports to two groups of countries, i.e., OECD countries (except for Canada and Mexico), and non-OECD countries (including Canada and Mexico). Specifically, the SLAB exports going to OECD countries will fall under the revised 40 CFR part 262 subpart H, while those going to non-OECD countries will be governed under 40 CFR part 262 subpart E, consistent with Universal Waste requirements. While subparts E and H are different regulations, the requirements for SLAB exports are largely similar.

Under §262.53(a) & (b) and §262.83(b) & (e), exporters must notify EPA of their intent to export SLABs and seek an Acknowledgement of Consent. The notification must contain detailed information with regard to the identity of the exporter, waste type, means of transport, ultimate destination facility, methods of treatment, recovery, and disposal, and destination and transit countries.

§262.53(a) & (b) - for SLAB Exports to Non-OECD Countries, Canada and Mexico(i) Data Item:

- Written notification. The notification must contain detailed information regarding the exporter, waste details, transporters, means of transport and containers to be used, all points of entry and departure for each foreign country of transit, receiving facility information, and ultimate management method.

(ii) Respondent Activities:

- Prepare and submit written notification at least 60 days before the initial shipment is intended to be shipped off site. This notice may cover export activities extending over a 12 month period.

§262.83(b) & (e) - for SLAB Exports to OECD Countries Other Than Canada and Mexico(i) Data Item:

- Written notification including a signed certification/declaration by the exporter with required wording. The notification must include detailed information regarding the shipment such as exporter details; recovery facility name and method of recovery; names and details of all transporters; details of all countries of import, transit, and import; and waste information including waste description meeting OECD requirements.
- (ii) Respondent Activities:
- Prepare and submit written notification at least 45 days prior to shipment. This notice may cover export activities over a 12 month period.

Under §262.53(c) and §262.83(b), when the conditions specified on the original notification change, the primary exporter must provide EPA with a renotification of the change. Also, where a shipment cannot be delivered for any reason, the exporter must renotify EPA of a change in the conditions and obtain a new EPA Acknowledgement of Consent.

§262.53(c) - for SLAB Exports to Non-OECD Countries, Canada and Mexico

- (i) Data Item:
- Written renotification if the conditions specified on the original notification change.
- (ii) Respondent Activities:
- Provide a renotification of the export change after the original notification.

§262.83(b) - for SLAB to OECD Countries Other Than Canada and Mexico

- (i) Data Item:
- Renotification required after the previous consent has expired.
- (ii) Respondent Activities:
- Provide a renotification if the notification expires prior to shipment.

Under §262.56 and §262.87(a), exporters must file detailed annual reports on SLAB exports containing information such as waste types, quantities, frequency, and ultimate destination of all exports, among others.

§262.56 - for SLAB Exports to Non-OECD Countries, Canada, and Mexico

(i) Data Item:

- Annual report including a signed certification by the exporter with required wording, summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year.

(ii) Respondent Activities:

- Prepare and submit the required annual report.

§262.87(a) - for SLAB Exports to OECD Countries Other Than Canada and Mexico(i) Data Item:

- Annual report including a signed certification by the exporter with required wording, summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year. During even numbered years, LQGs must include a description of waste reduction efforts and changes in waste generation (except for waste reported in the generators Biennial Report submission) in the annual report.

(ii) Respondent Activities:

- Prepare and submit the required annual report no later than March 1 of each year.

Under §262.53(d), §262.83(d)(14), §262.85(e), and §262.85(g), an exporter shall furnish to EPA any additional information which a receiving country requests in order to respond to a notification upon request by EPA.

§262.53(d) - for SLAB Exports to Non-OECD Countries, Canada and Mexico(i) Data Item:

- Additional information which a receiving country requests in order to respond to a notification.

(ii) Respondent Activities:

- Collect and submit additional information requested by EPA.

§262.83(d)(14), §262.85(e), and §262.85(g) - for SLAB Exports to OECD Countries Other Than Canada and Mexico

(i) Data Item:

- Additional information regarding financial assurances or contractual arrangements which a receiving country requests in order to respond to a notification (as discussed in existing notes to §262.83(d)(14) and §262.85(e), and in the existing §262.85(g)).

(ii) Respondent Activities:

- Collect and submit additional information requested by EPA.

Under §262.52(c) and §266.80(a) Item 6 in the table, an exporter must provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter transporting the shipment for the export of SLABs to a non-OECD country, Canada, or Mexico.

(i) Data Item:

- Acknowledgment of Consent for the shipment to the transporter

(ii) Respondent Activities:

- Provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter.

Under the recordkeeping requirements in §262.57 and §262.87(c), the exporter must keep a copy of each notification, the EPA Acknowledgment of Consent, each confirmation of delivery and each annual report, all for a period of at least 3 years.

§262.57 - for SLAB Exports to Non-OECD Countries, Canada and Mexico(i) Data Item:

- Notifications
- EPA Acknowledgement of Consent
- Confirmation of delivery
- Annual reports

(ii) Respondent Activities:

- Maintain the required records for at least three years.

§262.87(c) - for SLAB Exports to OECD Countries Other Than Canada and Mexico

(i) Data Item:

- Notifications
- Written consents
- Confirmation of delivery
- Exception reports
- Confirmation of recovery
- Annual reports

(ii) Respondent Activities:

- Maintain the required records for at least three years.

Under the shipment tracking requirements in §262.84 for slab exports to OECD countries other than Canada and Mexico, all U.S. parties subject to the contract provisions under §262.85 must accompany a movement document with the waste until it reaches the final recovery facility. This movement document must include all the information required under §262.83 (for notification) and additional information regarding the shipment of the waste such as transport requirements and transporter information.

(i) Data Item:

- A movement document accompanying all shipments for export. The movement document must include all the information required for notification and additional information regarding the shipment requirements. The document must also include a signed certification/declaration by the exporter with required wording.

(ii) Respondent Activities:

- Prepare the movement document and provide it with each shipment.

Under §262.87(b) for SLAB exports to OECD countries other than Canada and Mexico, an exporter must file an exception report if any of the following occurs: (1) it has not received a copy of the movement documentation signed by a transporter stating point of departure from the U.S., within 45 days of acceptance of waste, (2) within 90 days from the acceptance of waste, the exporter has not received written confirmation

from the recovery facility that the waste was received, or (3) the waste is returned to the U.S.

(i) Data Item:

- Exception report if any of the situations specified in §262.87(b) occurs.

(ii) Respondent Activities:

- Prepare and submit the required exception report if any of the conditions listed in §262.87(b) occurs.

Under §262.83(e) for SLAB exports to OECD countries other than Canada and Mexico, recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. This certificate of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste.

(i) Data Item:

- A certificate of recovery

(ii) Respondent Activities:

- Provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import.

**Import Consent Documentation**

Under the amended import requirements in §264.71(a)(3) and §265.71(a)(3), the U.S. receiving facility must match the relevant documentation confirming EPA's consent to import to an incoming import shipment's RCRA hazardous waste manifest, and submit a copy of the matched consent documentation along with the shipment's RCRA hazardous waste manifest (currently required to be submitted) to EPA within 30 days of import shipment delivery.

(i) Data Item:

- Documentation confirming EPA's consent to the import of hazardous waste

(ii) Respondent Activities:

- Submit to EPA the written documentation of EPA's consent to import within thirty (30) days of shipment delivery.

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

### 5(a) Agency Activities

#### OECD Revisions

Under §262.82(g), the transboundary movement of an Amber waste is exempt from the Amber control procedures if it is in certain quantities and destined for laboratory analysis to assess its physical or chemical characteristics, or to determine its suitability for recovery operations. As a result, the affected entities and EPA will incur cost savings.

Under §262.82(c), §262.82(d), and §262.82(e), when a transboundary movement of wastes to which concerned OECD Countries have given consent cannot be completed as intended (e.g., not in accordance with the notification, consents given by the competent authorities, or the terms of the contract) and alternative arrangements cannot be made to recover these wastes in an environmentally sound manner in the U.S., EPA must inform the competent authorities of the countries of export and transit, mentioning in particular the reason for returning the waste.

There are no Agency activities associated with the other new/amended requirements under the final OECD revisions.

#### SLAB Revisions

Under §262.53(a) & (b) and §262.83(b) & (e), exporters must notify EPA of their intent to export SLABs and seek an Acknowledgement of Consent. EPA will process the notifications, forward them to the countries of import, receive and process consent from countries of import, and forward the Acknowledgement of Consent to the exporter.

Under §262.53(c) and §262.83(b), when the conditions specified on the original notification change, the primary exporter must provide EPA with a renotification of the change. EPA will process these changes.

Under §262.56 and §262.87(a), exporters must file detailed annual reports on SLAB exports containing information such as waste types, quantities, frequency, and ultimate destination of all exports, among others. EPA will record the annual report information.

Under §262.53(d), §262.83(d)(14), §262.85(e), and §262.85(g), an exporter shall furnish to EPA any additional information which a receiving country requests in order to respond to a notification upon request by EPA. EPA will request the information and process the information provided by exporters.



Under §262.52(c) and §266.80(a) Item 6 in the table, an exporter of SLABs to non-OECD Countries, Canada and Mexico must provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter transporting the shipment for export to a non-OECD country, Canada, or Mexico. There are no Agency activities associated with this requirement.

Under §262.87(b), an exporter of SLABs to OECD Countries other than Canada and Mexico must file an exception report under certain conditions. There are no Agency activities associated with this requirement.

Under the recordkeeping requirements in §262.57 and §262.87(c), the exporter must keep a copy of each notification, EPA Acknowledgment of Consent, each confirmation of delivery and each annual report, all for a period of at least 3 years. There are no Agency activities associated with this requirement.

Under the shipment tracking requirements in §262.84 for SLAB exports to OECD Countries other than Canada and Mexico, all U.S. parties subject to the contract provisions under §262.85 must accompany a movement document with the waste until it reaches the final recovery facility. There are no Agency activities associated with this requirement.

Under §262.83(e) for SLAB exports to OECD Countries other than Canada and Mexico, recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. EPA will maintain the certificate of recovery from the recovery facility.

#### **Import Consent Documentation**

Under the amended import requirements in §264.71(a)(3) and §265.71(a)(3), the U.S. receiving facility must submit the documentation confirming EPA's consent to import (along with a copy of the RCRA hazardous waste manifest currently required) to EPA within 30 days of import shipment. EPA will maintain the documentation from the U.S. receiving facility.

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

The collection and management of the information submitted to EPA is stored by EPA in file cabinets and/or electronically to be compiled in an annual status report. In addition, the information is collected and stored for possible future use in enforcement actions. EPA uses electronic equipment such as personal computers and applicable database software, when appropriate.

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

In promulgating the rule codifying the OECD Decision, EPA evaluated the impact on regulated small entities. The decision to export or import hazardous waste is voluntary.

Thus, no business, small or otherwise, is required to export or import its hazardous waste. Therefore, there is no mandatory burden on the regulated community, including small businesses. Furthermore, for small businesses that do choose to export or import hazardous waste, EPA exempted conditionally exempt small quantity generators (less than 100 kilograms per month) from the requirements of the rule.

### **5(d) Collection Schedule**

Under the final revisions to the OECD rule and SLAB regulations, export notifications, exception reports, documentation of EPA's consent to import, certificates of recovery, and shipment tracking documents are generated and sent to EPA on an occurrence-specific basis for which there is no formalized schedule.

Documentation of EPA's consent to import must be submitted by the U.S. receiving facility to EPA (along with the RCRA hazardous waste manifest currently required) within 30 days of import shipment delivery.

Recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. This certificate of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste.

For SLAB exports to Non-OECD countries, Canada and Mexico, export notifications must be sent to EPA at least 60 days before the initial shipment is intended to be shipped off site. For SLAB exports to OECD countries Other than Canada and Mexico, export notifications must be sent to EPA within 45 days prior to initiating waste exports (or at least ten days if the shipment is going to a pre-approved facility in the country of import).

Exporters must file with EPA a detailed annual report on SLAB exports, including a signed certification, by March 1<sup>st</sup> of each year.

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

### **6(a) Estimating Respondent Burden**

#### **OECD Revisions**

EPA assessed the potential cost impacts of the final revisions to the OECD rule, including:

- Exemptions for wastes destined for laboratory analyses,
- The requirement to provide a certificate of recovery,
- Information collection requirements associated with exchange (R12) and accumulation (R13) recovery operations, and
- The notification requirements related to the return of wastes.

### **SLAB Revisions**

EPA assessed the potential cost impacts of the final revisions to the SLAB regulations, including:

- Notification requirements for SLAB exporters,
- The renotification requirements associated with any changes to the original SLAB export notification,
- The annual reporting requirements,
- Additional reporting requirements (if requested by EPA), and
- SLAB exporter recordkeeping requirements.

### **Import Consent Documentation**

EPA analyzed the final requirement that the U.S. receiving facility must match the RCRA manifest to the relevant import notice consent documentation, and must send a copy of the matched RCRA manifest (currently required to be submitted) and import consent documentation back to EPA within thirty days of delivery.

### **Exception report revisions for exports under subparts E and H of 40 CFR part 262**

The final revision to the current language in §262.55 and §262.87(b) will require exception reports to be submitted directly to the Director, ICAD, of OECA, EPA Headquarters, rather than to the EPA “Administrator.” There is no discernable cost impact associated with this final requirement.

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

##### **Labor Costs**

For U.S. exporters, U.S. importers, and U.S. transporters, EPA estimates an average hourly labor rate (including fringe and overhead) of \$98.86 for managerial staff, \$64.71 for technical staff, and \$33.85 for clerical staff.<sup>6</sup> These labor rates were obtained from the *Cost Assessment in Support of the Proposed Rule on Exports and Imports of Hazardous Waste Destined for Recovery among OECD Countries*<sup>7</sup> and updated to 2007

<sup>6</sup> See section 3.1 of the “Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation” (hereinafter referred to as the Cost Assessment document for the final rule), which is available in the docket for the rule.

<sup>7</sup> U.S. EPA. September 27, 2004 (revised February 24, 2005). *Cost Assessment in Support of the Proposed*

levels using Employment Cost Indices developed by the U.S. Bureau of Labor Statistics.<sup>8</sup>

### **Annual Capital and Operation & Maintenance (O&M) Costs**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. O&M costs are those costs associated with paperwork requirements incurred continually over the life of the ICR. They are defined by the EPA as “the recurring dollar amount of costs associated with O&M or purchasing services.” Such capital and O&M costs are expected to be negligible.

The materials costs used in this analysis are described in the following<sup>9</sup> and summarized in Table 1:

- Mailing costs<sup>10</sup>: EPA estimates that affected entities will incur a cost of \$4.24 to mail a five-ounce package by certified mail (\$1.48 for postage, \$2.65 for the certified-mail fee, and \$0.11 for a 9 x 12 manila envelope).

Affected entities are estimated to incur a cost of \$0.42 for each standard letter mailed (\$0.41 for first class postage and \$0.01 for a standard envelope).

- Copying Costs: EPA estimates that affected entities will incur a cost of \$0.11 per page for copying.
- Faxing costs: EPA estimates that affected entities will incur a cost of \$0.12 for each international fax they send. This cost was derived from the average revenues per minute for a telephone call from the U.S. to an OECD Country (excluding Canada and Mexico). Revenue figures were obtained from the *2005 International Telecommunications Data Report* issued by the Federal Communications Commission on April 24, 2007. The cost estimate assumes that the fax transmission will take one-minute.
- Domestic telephone call costs: EPA estimates that affected entities will incur a cost of \$0.90 for each domestic telephone call they make. This cost was

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*Rule on Exports and Imports of Hazardous Waste Destined for Recovery among OECD Countries*

<sup>8</sup> To update the hourly rates from 2004 to 2007 levels, EPA referred to Table 9. Employment Cost Index for Wages and Salaries, for Private Industry Workers by Occupation Group and Industry (Not seasonally adjusted) of *Employment Cost Index: Historical Listing (December 2005 = 100)*, U.S. Bureau of Labor Statistics (July 31, 2007). This table presents employment cost indices for private industry workers, by annual quarter (i.e., for March, June, September, and December). EPA used the June 2004 Index (96.5) and the June 2007 Index (105.1) to develop an adjustment factor of 1.089 (i.e.,  $105.1 / 96.5 = 1.089$ ). Available at: <http://www.bls.gov/ncs/ect/home.htm>.

<sup>9</sup> See section 3.2 of the Cost Assessment document for the final rule.

<sup>10</sup> Based on the postal mail rates as of April 2008. U.S. First Class postage has since increased from \$0.41 to \$0.42 per standard letter. This change is expected to have a negligible impact on total costs.

derived by averaging the advertised rates of a 15-minute State-to-State telephone call from four large U.S. long distance carriers.

**Table 1**  
**Materials Costs Used to Assess the Cost Impacts of the Final Rule**

<b>Materials Cost Category</b>	<b>Unit Cost (2007 dollars)</b>
Mailing Costs (9 x 12 package)	\$4.24
Mailing Costs (standard letter)	\$0.42
Copying Costs	\$0.11
Faxing Costs	\$0.12
Domestic Telephone Call Costs	\$0.90

### **6(c) Estimating Agency Burden and Costs**

For Agency burden and costs, EPA estimates an average hourly labor rate of \$60.66 for managerial staff (GS-14, Step 1), \$51.33 for technical staff (GS-13, Step 1), and \$29.76 for clerical staff (GS-9, Step 1).<sup>11</sup> To derive these hourly estimates, EPA referred to the *General Schedule (GS) Salary Table 2007*. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal government. EPA applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly labor rates.

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

In this section, EPA first describes the respondent universe affected by the new information collection requirements resulting from the final action. EPA then estimates the *annual aggregate burden* to respondents under the final rule and existing RCRA information collection requirements. The universe estimates and assumptions used in the development of this ICR are based on the economic assessment developed for this rulemaking: “Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation” (hereinafter referred to as the Cost Assessment document for the final rule), which is available in the docket for the rule.

#### **(1) Respondent Universe**

##### **OECD Revisions**

<sup>11</sup> See section 3.1 of the Cost Assessment document for the final rule.

In Table 2 below, EPA provides estimates of the annual number of importer and import shipments, and annual exporter and export shipments that will be subject to the paperwork requirements in the final rule.<sup>12</sup>

**Table 2**  
**Number of Import and Export Shipments potentially Affected by the Final Revisions to EPA's OECD Rule**

Type of Shipment	Number of Affected Entities*		Number of Shipments per Year		
	U.S. Exporters/ U.S. Importers	U.S. Transporters	Wastes Destined for Laboratory Analysis**	Wastes Destined for Recovery Operations***	Total
Export	6	6	10	479	489**
Import	15	15	4	296	300****

\* EPA has assumed that there is one U.S. transporter for each U.S. exporter and U.S. importer.

\*\* Of the 489 shipments to OECD Countries, 2.1 percent (10) are samples destined for laboratory analysis. The remaining 479 (i.e., 489 - 10) shipments are shipments of hazardous wastes destined for recovery.

\*\*\* Of the 479 export shipments of hazardous wastes destined for recovery, it is estimated that 12 percent (or 57 shipments) are shipped to R12/R13 recovery facilities in OECD Countries. Of the 296 import shipments of hazardous wastes destined for recovery, 36 shipments (or 12 percent) are received at R12/R13 recovery facilities in the U.S.

\*\*\*\* Of the 300 shipments from OECD Countries, 1.4 percent (4) are samples destined for laboratory analysis. The remaining 296 (i.e., 300 - 4) shipments are shipments of hazardous wastes destined for recovery.

### **SLAB Revisions**

In Table 3 below, EPA provides estimates of the annual number of export shipments that will be subject to the paperwork requirements in the final rule.<sup>13</sup>

**Table 3**  
**Number of Export Shipments potentially Affected by the Final SLAB Revisions**

Type of Shipment	Number of Affected Entities*		Number of SLAB Export Shipments Per Year	Number of Notices Per Year
	U.S. SLAB Exporters	U.S. SLAB Transporters		
Export	1,141**	571	16,154	668

\* Assumes 1,141 exporters, zero importers, and 571 transporters. See universe assumptions discussed in Sections 3.4, 4.2 and 4.7 of the Cost Assessment document for the final rule.

\*\* EPA estimates that 640 U.S. exporters of SLABs will be required to prepare and submit an annual report under the final rule. 27 of these exporters are assumed to be small exporters and the

12 These assumptions are discussed in detail in section 3.3.2 of the Cost Assessment document for the final rule.

13 These assumptions are discussed in detail in section 3.4.2 of the Cost Assessment document for the final rule.

remaining 613 are assumed to be large exporters.

### **Import Consent Documentation**

In Table 4 below, EPA provides estimates of the annual number of importer and import shipments, and annual exporter and export shipments that will be subject to the paperwork requirements in the final rule.<sup>14</sup>

**Table 4**  
**Number of Import Shipments potentially Affected by the Final Import Consent Documentation Requirements**

Type of Shipment	Number of Affected U.S. Receivers*	Number of Import Shipments Per Year*
Import	136	2,712

\* The ratio of shipments to receivers is estimated to be 20 to 1.

## **(2) Annual Respondent Hour and Cost Burden under the Final Rule**

### **OECD Revisions**

#### **(a) Reading the Regulations**

Affected entities are expected to incur first year incremental costs associated with reading the rule in order to understand and comply with the new requirements. EPA estimates that a total of 42 entities (i.e., six U.S. exporters, 15 U.S. importers, and 21 U.S. transporters) will read the final rule in order to understand and comply with the new requirements. EPA also estimates that each entity will experience a cost of \$114.14 in reading the rule.<sup>15</sup> Thus, collectively, U.S. exporters, U.S. importers, and U.S. transporters may experience a *one-time* cost of approximately \$4,794 (i.e., 42 entities x \$114.14/entity) for this activity. See Exhibit 1.

#### **(b) Exemption for Wastes Destined for Laboratory Analysis**

Under §262.82(g), shipments of Amber-list wastes are exempt from the Amber control procedure if they are explicitly destined for laboratory analysis to assess their physical/chemical characteristics or to determine their suitability for recovery operations. As a result, the affected entities will experience cost savings, since they will no longer need to comply with the information collection requirements under the existing regulations.

<sup>14</sup> These assumptions are discussed in detail in Section 3.5.2 of the Cost Assessment document for the final rule.

<sup>15</sup> See section 4.1.1 of the Cost Assessment document for the final rule.

EPA provides the estimated cost savings associated with the exemption for wastes destined for laboratory analysis in Exhibit 2 (for exports from the U.S. to OECD Countries) and Exhibit 3 (for imports to the U.S. from OECD Countries). For detailed discussions, see Section 4.1.2 of the Cost Assessment document for the final rule.

**(c) Certificate of Recovery**

Under §262.83(e), recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. This certificate of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste.

EPA presents the costs associated with the certificate of recovery in Exhibit 4. For detailed discussions, see Section 4.1.3 of the Cost Assessment document for the final rule.

**(d) Exchange and Accumulation Recovery Operations**

Under §262.82(f), shipments of hazardous wastes destined for exchange (R12) or accumulation (R13) recovery operations need to comply with additional information collection requirements. These requirements include: (1) indicating the subsequent R1-R11 recovery facility (e.g., facility that conducts solvent reclamation, acid regeneration) in the notification, (2) providing and maintaining a signed copy of the movement/tracking document, (3) preparing and providing a certificate of recovery for R12/R13 recovery operations, and (4) providing and maintaining a copy of the certificate of recovery for R1-R11 recovery operations.

EPA's estimated costs associated with these requirements are presented in Exhibit 5. For detailed discussions, see Section 4.1.4 of the Cost Assessment document for the final rule.

**(e) Return of Wastes**

Under §262.82(c), §262.82(d), and §262.82(e), when a shipment of hazardous wastes to which concerned countries have given consent cannot be completed in accordance with the terms of the contract and alternative arrangements cannot be made to recover these wastes in an environmentally sound manner in the U.S., EPA must inform the competent authorities of the countries of export and transit the reason for returning the waste. The U.S. importer must then complete the return within 90 days from the time EPA informs the country of export of the need to return the waste, unless informed in writing by EPA of another timeframe agreed to by the concerned Member countries.

In Exhibit 6, EPA presents the estimated costs associated with the return of wastes. For detailed discussions, see Section 4.1.5 of the Cost Assessment document for



the final rule.

### **SLAB Revisions**

Since the SLAB Rule applies only to the export of SLABs, U.S. importers will not experience any costs or cost savings from the rule.

#### **(a) Reading the Regulations**

EPA estimates that a total of 1,712 entities (i.e., 1,141 U.S. exporters and 571 U.S. transporters) will read the rule during the first year of implementation in order to understand and comply with the new requirements. We also estimate that each entity will experience a cost of \$260.64 in reading the rule. Thus, collectively, U.S. exporters and U.S. transporters may experience a *one-time* cost of approximately \$446,207 (i.e., 1,712 entities x \$260.64/entity) for this activity. In Exhibit 7, EPA presents the estimated costs associated with reading the regulations. For detailed discussions, see Section 4.2.1 of the Cost Assessment document for the final rule.

#### **For SLAB Exports to Non-OECD Countries, Canada and Mexico**

The following analysis of cost impacts associated with the final 40 CFR part 262, subpart E requirements assumes that all SLABs are exported to Canada and Mexico based on the fact that the vast majority of SLABs are exported to these two countries<sup>16</sup> and are currently not subject to any export requirements. (The cost impacts of the final 40 CFR part 262, subpart H requirements that apply only to the export of SLABs to OECD countries (except Canada and Mexico), discussed separately below under For SLAB Exports to OECD Countries Other Than Canada and Mexico, are not assessed given such export represents a very small percentage of the total SLAB export quantity.)

#### **(b) Notification**

Under §262.53(a) & (b) and §262.83(b) & (e), the exporters must submit a notification to EPA indicating their intent to export SLABs. EPA then must process the notification and seek consent from the countries of imports and transit. EPA will undertake the following tasks to complete the notification process and issue an Acknowledgment of Consent:

- Receive and process the notification from the U.S. exporter
- Prepare and transmit a confirmation of receipt to the U.S. exporter
- Forward the notification to the competent authorities of the countries of import and transit.
- Receive and process consent or objection from the competent authorities of the countries of import and transit.
- Forward written Acknowledgement of Consent or objection to U.S. exporter.

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<sup>16</sup> See discussion in Section 3.4 and Attachment E of the Cost Assessment document for the final rule.

In Exhibit 8, EPA presents the estimated costs associated with the notification requirement. For detailed discussions, see Section 4.2.2 of the Cost Assessment document for the final rule.

**(c) Renotification**

Under §262.53(c) and §262.83(b), when the conditions specified under the original notification change, the U.S. exporter must provide EPA with a renotification of the change. Also, where a shipment cannot be delivered for any reason, the exporter must renotify EPA of a change in the conditions and obtain a new EPA Acknowledgement of Consent. It is estimated that only a fraction of exporters will be subject to this requirement. In Exhibit 9, EPA presents the estimated costs associated with the renotification requirement. For detailed discussions, see Section 4.2.3 of the Cost Assessment document for the final rule.

**(d) Annual Report**

Under §262.56 and §262.87(a), exporters must submit detailed annual reports to EPA on SLAB exports containing information such as waste types, quantities, frequency, and ultimate destination of all exports, among others. In Exhibit 10, EPA presents the estimated costs associated with the annual report requirement. For detailed discussions, see Section 4.2.4 of the Cost Assessment document for the final rule.

**(e) Additional Report**

Under §262.53(d), §262.83(d)(14), §262.85(e), and §262.85(g), upon request by EPA, an exporter must submit to EPA any additional information which a receiving country requests in order to respond to a notification. In Exhibit 11, EPA presents the estimated costs associated with the additional reporting requirement. For detailed discussions, see Section 4.2.5 of the Cost Assessment document for the final rule.

**(f) Acknowledgment of Consent to Transporter**

Under §262.52(c) and §266.80(a) Item 6 in the table, the exporter is required to provide a copy of the EPA Acknowledgment of Consent for each shipment to the transporter transporting the shipment for export. EPA will not experience any costs associated with this requirement. In Exhibit 12, EPA presents the estimated costs associated with the Acknowledgment of Consent requirement. For detailed discussions, see Section 4.2.6 of the Cost Assessment document for the final rule.

**(g) Recordkeeping**

Under §262.57 and §262.87(c), U.S. exporters must keep a copy of each notification, EPA Acknowledgement of Consent, each confirmation of delivery, and each annual report for a period of at least 3 years. In Exhibit 13, EPA presents the estimated costs associated with the recordkeeping requirement. For detailed discussions, see

Section 4.2.7 of the Cost Assessment document for the final rule.

For SLAB Exports to OECD Countries Other Than Canada and Mexico

Below are the requirements of 40 CFR part 262, subpart H associated only with the export of SLABs to OECD countries other than Canada and Mexico. That is, these requirements are not required of SLAB exports to non-OECD countries, Canada and Mexico.<sup>17</sup> The cost impacts associated with the export of SLABs to OECD countries other than Canada and Mexico are not assessed given it is a very small percentage of the total SLAB export quantity.<sup>18</sup> The costs estimated above for the export of SLABs to non-OECD countries, Canada and Mexico remain as the base costs.

**(h) Movement/Tracking Document**

Under §262.84, each time a U.S. exporter ships SLABs to an OECD Member country other than Canada and Mexico, the exporter is required to complete and submit to the carrier a movement/tracking document. No incremental costs are expected for transporters. As noted above, the cost impact of this requirement associated with the export of SLABs to OECD countries other than Canada and Mexico is not assessed given it is a very small percentage of the total SLAB export quantity.

**(i) Exception Report**

Under §262.87(b), an exporter must file an exception report if they do not receive the necessary documentation required by the rule to confirm transfer of the waste and receipt by the recovery facility within the allotted period of time or if the waste is returned to the U.S. As noted above, the cost impact of this requirement associated with the export of SLABs to OECD countries other than Canada and Mexico is not assessed given it is a very small percentage of the total SLAB export quantity.

**(j) Certificate of Recovery**

Under §262.83(e), recovery facilities must provide a certificate of recovery to the exporter and to the competent authorities of the countries of export and import. This certificate of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste. As noted above, the cost impact of this requirement associated with the export of SLABs to OECD countries other than Canada and Mexico is not assessed given it is a very small percentage of the total SLAB export quantity.

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<sup>17</sup> On the other hand, the Acknowledgement of Consent to Transporter requirement is required only of SLAB exports to non-OECD countries, Canada and Mexico under §262.52(c) and §266.80(a) as aforementioned, but is not required of SLAB exports to OECD countries other than Canada and Mexico.

<sup>18</sup> The Agency assumes that all of the SLABs will be exported to Canada and Mexico but not to OECD countries. See discussion in Section 3.4 and Attachment E of the Cost Assessment document for the final rule.

### **Import Consent Documentation**

#### **(a) Receiving Facility Submission to EPA**

Under §264.71(a)(3) and §265.71(a)(3), U.S. receivers will be required to submit the import consent documentation with manifest submission to EPA. In Exhibit 14, EPA presents the estimated costs associated with this provision. For detailed discussions, see Section 4.3.1 of the Cost Assessment document for the final rule.

#### **(3) Annual Respondent Hour and Cost Burden under Existing Information Collection Requirements**

In addition to the new paperwork requirements in the final rule, EPA identified several existing information collection activities in the following ICRs that will be undertaken by the potentially impacted facilities:

- ICR No. 0820.10, OMB Control No. 2050-0035, "Hazardous Waste Generator Standards"
  - Exporter requirements
  - Importer-Exporter Requirements OECD and Bilateral
- ICR No. 1571.08, OMB Control No. 2050-0120, "General Hazardous Waste Facility Standards"
  - Foreign shipment Import Report (264.12(a) and 265.12(a))
- ICR No. 0261.15, OMB Control No. 2050-0028, "Notification of Regulated Waste Activity"

#### **6(e) Bottom Line Burden Hours and Costs**

##### **(1) Respondent Tally**

In Exhibit 15, EPA provides the estimated total annual respondent burden and costs under the aforementioned new information collection activities. It shows that the total annual respondent burden under the final rule, including the cost of reading the rule during the first year of implementation, is estimated to be 14,854 hours and \$832,405. After the first year of implementation, the total annual respondent burden (i.e., excluding reading the rule) is estimated to be 8,799 hours and \$381,404. Therefore, the bottom line three-year respondent burden is estimated to be 32,451 hours and \$1,595,214.

In Exhibit 16, EPA tallies respondents' total hour and cost burden for both new and existing paperwork requirements associated with the final rule in order to derive aggregate burden.

##### **(2) Agency Tally**

Estimated Agency burden and costs for the various information collection activities under the final rule, as delineated in Section 5(a) above, are also presented in Exhibits 1 to 14, where applicable. EPA provides the estimated total annual burden to the Agency under the final rule in Exhibit 17. It shows that the total annual Agency burden under the final rule is estimated to be 2,106 hours and \$78,768. The three-year total Agency burden is thus estimated to be 6,317 hours and \$236,305.

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

As aforementioned, the new paperwork requirements under the final rule are necessary to bring EPA's hazardous waste regulations into compliance with the binding Amended 2001 OECD Decision; to make more uniform notification and consent practice for the export shipment of SLABs in order to ensure that SLABs are sent to reclamation facilities in countries that can manage them in an environmentally sound manner; and to require documentation of EPA's consent to the import shipment of hazardous wastes in order to facilitate oversight of hazardous waste imports to the U.S.

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

The annual public reporting burden for this ICR is estimated to average 3.63 hours/year per respondent under the final OECD revisions, 5.42 hours/year per respondent under the final SLAB revisions, and 8.44 hours/year per respondent under the final import consent documentation. The annual public recordkeeping burden is estimated to average 10.20 hours/year per respondent under the final OECD revisions, and 0.14 hours/year per respondent under the final SLAB revisions.

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 the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2005-0018, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the [insert your Program Office docket name] 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](http://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-2005-0018 and OMB Control Number 2050-0201 in any correspondence.

**Exhibit 1**  
**OECD Revisions - Reading the Rule**  
(In the first year of Rule Implementation Only)

Activity	Cost per Entity							Cost of All Entities		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Entities <sup>c</sup>	Total Hours	Total Cost
<b>Reading the Regulations</b>										
U.S. Exporters	0.5	1	0	1.5	\$114.14	\$0.00	\$114.14	6	9	\$684.84
U.S. Importers	0.5	1	0	1.5	\$114.14	\$0.00	\$114.14	15	22.50	\$1,712.10
U.S. Transporters	0.5	1	0	1.5	\$114.14	\$0.00	\$114.14	21	31.50	\$2,396.94
<b>Total</b>								42	63.00	\$4,793.88

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.3 of the Cost Assessment document for the final rule.

**Exhibit 2**  
**OECD Revisions - Exemption for Wastes Destined for Laboratory Analysis**  
**For Exports from the U.S. to OCED Countries**

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Exports from the U.S. to OCED Countries</b>										
<b>U.S. Exporters</b>										
Prepare and Submit Notification to EPA	0.1	1.8	1.5	3.4	\$177.14	\$4.24	\$181.38	10	34	\$1,813.79
Complete and Sign Movement/Tracking Document	0	0.25	0	0.25	\$16.18	\$0.00	\$16.18	10	2.5	\$161.78
Receive and maintain copy of notification of intent to export, Acknowledgment of Receipt, written consent/objection, and signed movement/tracking document provided by the recovery facility	0	0	0.25	0.25	\$8.46	\$0.00	\$8.46	10	2.5	\$84.63
<b>Subtotal</b>	0.1	2.05	1.75	3.9	\$201.78	\$4.24	\$206.02	10	39	\$2,060.19
<b>U.S. Transporters</b>										
Upon obtaining physical custody of the waste, sign the movement/tracking document	0	0.01	0	0.01	\$0.65	\$0.00	\$0.65	10	0.1	\$6.47
Maintain copy of signed movement/tracking document	0	0	0.1	0.1	\$3.39	\$0.00	\$3.39	10	1	\$33.85
Upon delivery of the waste, obtain signed copy of movement/tracking document from the OECD Country recovery facility	0	0.01	0	0.01	\$0.65	\$0.00	\$0.65	10	0.1	\$6.47
<b>Subtotal</b>	0	0.02	0.1	0.12	\$4.68	\$0.00	\$4.68	10	1.2	\$46.79
<b>EPA</b>										
Receive and process notification from U.S. exporter	0	1	0	1	\$51.33	\$0.00	\$51.33	10	10	\$513.30
Prepare and transmit	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	10	2.5	\$75.60



Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
confirmation of receipt to U.S. exporter										
Forward notification to the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.24	\$5.00	10	1.6	\$50.02
Receive and process Acknowledgement of Receipt from the competent authority of the country of import	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	10	2.5	\$74.40
Receive and process consent/objection from the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.00	\$4.76	10	1.6	\$47.62
Forward Acknowledgement of Receipt and written consent/objection to U.S. exporter	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	10	2.5	\$75.60
Receive and process signed copy of movement/tracking document provided by the OECD Country recovery facility	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	10	2.5	\$74.40
<b>Subtotal</b>	0	1	1.32	2.32	\$90.61	\$0.48	\$91.09	10	23.2	\$910.93
<b>Total</b>	0.1	3.07	3.17	6.34	\$297.07	\$4.72	\$301.79	10	63.4	\$3,017.91

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document.

<sup>c</sup> Based on shipment estimates discussed in Section 4.1.2 of the Cost Assessment document.

**Exhibit 3**  
**OECD Revisions - Exemption for Wastes Destined for Laboratory Analysis**  
**For Imports to the U.S. from OECD Countries**

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Imports to the U.S. from OECD Countries</b>										
<b>U.S. Importers</b>										
Receive and maintain copy of confirmation of receipt	0	0	0.25	0.25	\$8.46	\$0.00	\$8.46	4	1	\$33.85
Sign movement/tracking document and provide copy to OECD Country exporter, EPA and competent authority of the country of export	0.08	0	0.25	0.33	\$16.37	\$0.00	\$16.37	4	1.32	\$65.49
<b>Subtotal</b>	0.08	0	0.5	0.58	\$24.83	\$0.00	\$24.83	4	2.32	\$99.34
<b>U.S. Transporters</b>										
Upon obtaining physical custody of the waste, sign the movement/tracking document	0	0.01	0	0.01	\$0.65	\$0.00	\$0.65	4	0.04	\$2.59
Maintain copy of signed movement/tracking document	0	0	0.1	0.1	\$3.39	\$0.00	\$3.39	4	0.4	\$13.54
Upon delivery of the waste, obtain signed copy of movement/tracking document from the OECD Country recovery facility	0	0.01	0	0.01	\$0.65	\$0.00	\$0.65	4	0.04	\$2.59
<b>Subtotal</b>	0	0.02	0.1	0.12	\$4.68	\$0.00	\$4.68	4	0.48	\$18.72
<b>EPA</b>										
Receive and process notification from the competent authority of the country of export	0	1	0	1	\$51.33	\$0.00	\$51.33	4	4	\$205.32
Prepare and transmit Acknowledgment of Receipt to the competent authorities of the countries of export and transit	0	0	0.25	0.25	\$7.44	\$0.24	\$7.68	4	1	\$30.72

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
Prepare and transmit confirmation of receipt to U.S. importer	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	4	1	\$30.24
Review notification to determine if U.S. recovery facility is authorized to handle the waste	0.5	1.5	0	2	\$107.33	\$0.00	\$107.33	4	8	\$429.30
Prepare and provide written consent/objection to the competent authorities of the countries of export and transit	0	0	0.25	0.25	\$7.44	\$0.24	\$7.68	4	1	\$30.72
Receive and process signed copy of movement/tracking document provided by the U.S. recovery facility	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	4	1	\$29.76
<b>Subtotal</b>	0.5	2.5	1	4	\$188.42	\$0.60	\$189.02	4	16	\$756.06
<b>Total</b>	0.58	2.52	1.6	4.7	\$217.93	\$0.60	\$218.53	4	18.8	\$874.11

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document.

<sup>c</sup> Based on shipment estimates discussed in Section 4.1.2 of the Cost Assessment document.

**Exhibit 4**  
**OECD Revisions - Certificate of Recovery**

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Exports from the U.S. to OECD Countries</b>										
<b>Exporters</b>										
Receive and maintain the certificate of recovery provided by the OECD Country recovery facility	0	0	0.1	0.1	\$3.39	\$0.00	\$3.39	479	47.90	\$1,621.42
<b>EPA</b>										
Receive and maintain the certificate of recovery provided by the OECD Country recovery facility	0	0	0.1	0.1	\$2.98	\$0.00	\$2.98	479	47.90	\$1,425.50
<b>Total</b>	0	0	0.2	0.2	\$6.36	\$0.00	\$6.36	479	95.80	\$3,046.92
<b>Imports to the U.S. from OECD Countries</b>										
<b>Importers</b>										
Prepare and provide certificate of recovery to OECD Country exporter, EPA, and the competent authority of the country of export	0	0.2	0.25	0.45	\$21.40	\$0.36	\$21.76	296	133.20	\$6,442.29
Maintain copy of certificate of recovery	0	0	0.1	0.1	\$3.39	\$0.00	\$3.39	296	29.60	\$1,001.96
<b>Subtotal</b>	0	0.2	0.35	0.55	\$24.79	\$0.36	\$25.15	296	162.80	\$7,444.25
<b>EPA</b>										
Receive and Maintain the certificate of recovery provided by the U.S. recovery facility	0	0	0.1	0.1	\$2.98	\$0.00	\$2.98	296	29.60	\$880.90
<b>Total</b>	0	0.2	0.45	0.65	\$27.77	\$0.36	\$28.13	296	192.40	\$8,325.15

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on shipment estimates discussed in Section 4.1.3 of the Cost Assessment document for the final rule.

**Exhibit 5**  
**OECD Revisions - Exchange and Accumulation Recovery Operations**

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Exports from the U.S. to OECD Countries</b>										
<b>Exporters</b>										
Indicate in the notification the recovery facility where subsequent R1-R11 recovery took place	0	0.02	0	0.02	\$1.29	\$0.00	\$1.29	57	1.14	\$73.77
<b>EPA</b>										
Receive and maintain the certificate of recovery provided by the OECD Country R12/R13 recovery facility	0	0	0.1	0.1	\$2.98	\$0.00	\$2.98	57	5.7	\$169.63
<b>Total</b>	0	0.02	0.1	0.12	\$4.27	\$0.00	\$4.27	57	6.84	\$243.40
<b>Imports to the U.S. from OECD Countries</b>										
<b>Importers</b>										
Sign movement/tracking document and provide copy to OECD Country exporter, EPA, and competent authority of the country of export	0.08	0	0.25	0.33	\$16.37	\$0.00	\$16.37	36	11.88	\$589.37
Maintain copy of signed movement/tracking document	0	0	0.1	0.1	\$3.39	\$0.00	\$3.39	36	3.6	\$121.86
Prepare and provide certificate of recovery to OECD Country exporter, EPA, and competent authority of the country of export	0	0.2	0.25	0.45	\$21.40	\$0.36	\$21.76	36	16.2	\$783.52
Obtain certificate of recovery from the U.S. R1-R11 facility	0	0	0.16	0.16	\$5.42	\$0.90	\$6.32	36	5.76	\$227.38
Provide copy of certificate of recovery to EPA and the competent authority of the country of export	0	0	0.16	0.16	\$5.42	\$0.24	\$5.66	36	5.76	\$203.62

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Total</b>	0.08	0.2	0.92	1.2	\$51.99	\$1.50	\$53.49	36	43.2	\$1,925.74

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule

<sup>c</sup> Based on shipment estimates discussed in Section 3.3 of the Cost Assessment document for the final rule.

**Exhibit 6**  
**OECD Revisions - Return of Wastes**

Activity	Cost per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Exports from the U.S. to OCED Countries</b>										
<b>EPA</b>										
Receive and maintain notification of the return of the waste provided by the competent authority of the country of import	0	0	0.1	0.1	\$2.98	\$0.00	\$2.98	1	0.1	\$2.98
<b>Imports to the U.S. from OCED Countries</b>										
<b>U.S. Importer</b>										
Prepare and Submit Notification to EPA. (U.S. importer must inform EPA [ ....] of the need to return the shipment. Assumes: importer completes return within 90 days, return shipment does not cross any new transit country.)	0	0.2	0.25	0.45	\$21.40	\$0.44 (mailed)	\$21.84	1	0.45	\$21.84
<b>EPA</b>										
Inform the competent authorities of the countries of export and transit about the return of the wastes	0	0.5	0	0.5	\$25.67	\$0.12 (FAX)	\$25.79	1	0.5	\$25.79
<b>Total</b>	0	0.7	0.35	1.05	\$50.05	\$0.56	\$50.61	2	1.05	\$50.61

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule. Plus, assumes April 2009 first-class postage of \$0.42 plus \$0.01 for envelop and \$0.01 for importer to mail one sheet of paper.

<sup>c</sup> Based on shipment estimates discussed in Section 4.1.5 of the Cost Assessment document for the final rule.

**Exhibit 7**  
**SLAB Revisions - Reading the Rule**  
(In the first year of Rule Implementation Only)

Activity	Cost per Entity							Cost of All Entities		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Entities <sup>c</sup>	Total Hours	Total Cost
<b>Reading the Regulations</b>										
U.S. Exporters	1	2.5	0	3.5	\$260.64	\$0.00	\$260.64	1,141	3,993.50	\$297,384.54
U.S. Transporters	1	2.5	0	3.5	\$260.64	\$0.00	\$260.64	571	1,998.50	\$148,822.59
<b>Total</b>								1,712	5,992.00	\$446,207.12

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Sections 3.4 and 4.7 of the Cost Assessment document for the final rule.



**Exhibit 8**  
***SLAB Revisions – Notification***  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Notice							Cost of All Notices		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Notices <sup>c</sup>	Total Hours	Total Cost
<b>Notification</b>										
<b>U.S. Exporters</b>										
Prepare and submit notification	0	1.5	0	1.5	\$97.07	\$0.42	\$97.49	668	1,002.00	\$65,119.98
<b>Total</b>	0	1.5	0	1.5	\$97.07	\$0.42	\$97.49	668	1002.00	\$65,119.98
<b>EPA</b>										
Receive and process notification	0	1	0	1	\$51.33	\$0.00	\$51.33	668	668.00	\$34,288.44
Prepare and transmit confirmation of receipt to U.S. exporter	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	668	167.00	\$5,050.08
Forward notification to the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.24	\$5.00	668	106.88	\$3,341.07
Receive and process Acknowledgement of Receipt from the competent authority of the country of import	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	668	167.00	\$4,969.92
Receive and process consent/objection from the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.00	\$4.76	668	106.88	\$3,180.75
Forward written Acknowledgement of Consent or objection to U.S. exporter	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	668	167.00	\$5,050.08
<b>Total</b>	0	1	1.07	2.07	\$83.17	\$0.48	\$83.65	668	1,382.76	\$55,880.34

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 9**  
***SLAB Revisions – Renotification***  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Notice							Cost of All Notices		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Notices <sup>c</sup>	Total Hours	Total Cost
<b>Renotification</b>										
<b>U.S. Exporters</b>										
Collect specific changes	0	0.5	0	0.5	\$32.36	\$0.00	\$32.36	43	21.5	\$1,391.27
Prepare and submit renotification	0.1	0	0.5	0.6	\$26.81	\$0.42	\$27.23	43	25.8	\$1,170.93
<b>Total</b>	0.1	0.5	0.5	1.1	\$59.17	\$0.42	\$59.59	43	47.3	\$2,562.20
<b>EPA</b>										
Receive and process notification	0	0.5	0	0.5	\$25.67	\$0.00	\$25.67	43	21.5	\$1,103.60
Prepare and transmit confirmation of receipt to U.S. exporter	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	43	10.75	\$325.08
Forward notification to the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.24	\$5.00	43	6.88	\$215.07
Receive and process Acknowledgement of Receipt from the competent authority of the country of import	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	43	10.75	\$319.92
Receive and process consent/objection from the competent authorities of the countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.00	\$4.76	43	6.88	\$204.75

Activity	Cost per Notice							Cost of All Notices		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Notices <sup>c</sup>	Total Hours	Total Cost
Forward written Acknowledgement of Consent or objection to U.S. exporter	0	0	0.25	0.25	\$7.44	\$0.12	\$7.56	43	10.75	\$325.08
<b>Total</b>	0	0.5	1.07	1.57	\$57.51	\$0.48	\$57.99	43	65.71	\$2,493.49

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 10**  
***SLAB Revisions - Annual Report***  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Entity							Cost for all Entities		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Entities <sup>c</sup>	Total Hours	Total Cost
<b>Annual Report</b>										
<b>Large U.S. Exporters</b>										
Research specific export information	0	1	1	2	\$98.56	\$0.00	\$98.56	613	1,226.00	\$60,417.28
Prepare and submit report	0.1	1	0.3	1.4	\$84.75	\$4.24	\$88.99	613	858.20	\$54,551.48
<b>Small U.S. Exporters</b>										
Research specific export information	0	0.5	0.5	1	\$49.28	\$0.00	\$49.28	27	27.00	\$1,330.56
Prepare and submit report	0.1	0.5	0.5	1.1	\$59.17	\$4.24	\$63.41	27	29.70	\$1,711.96
<b>Total</b>	0.2	3	2.3	5.5	\$291.76	\$8.48	\$300.24	640	2,140.90	\$118,011.29
<b>EPA</b>										
Receive and record report	0	0.1	0.5	0.6	\$20.01	\$0.00	\$20.01	640	384.00	\$12,808.32
<b>Total</b>	0	0.1	0.5	0.6	\$20.01	\$0.00	\$20.01	640	384.00	\$12,808.32

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 11**  
***SLAB Revisions - Additional Report***  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Entity							Cost for all Entities		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Reports <sup>c</sup>	Total Hours	Total Cost
<b>Additional Report</b>										
<b>U.S. Exporters</b>										
Collect and provide additional information	0	0.5	0.5	1	\$49.28	\$4.24	\$53.52	2	2	\$107.04
<b>Total</b>	0	0.5	0.5	1	\$49.28	\$4.24	\$53.52	2	2	\$107.04
<b>EPA</b>										
Receive and process Request for Additional Information from the competent authority of the country of import	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	2	0.5	\$14.88
Forward request for additional information to U.S. Exporter	0	0	0.16	0.16	\$4.76	\$0.12	\$4.88	2	0.32	\$9.76
Receive and process additional info from U.S. Exporter	0	0	0.25	0.25	\$7.44	\$0.00	\$7.44	2	0.5	\$14.88
Forward additional info to countries of import and transit	0	0	0.16	0.16	\$4.76	\$0.24	\$5.00	2	0.32	\$10.00
<b>Total</b>	0	0	0.82	0.82	\$24.40	\$0.36	\$24.76	2	1.64	\$49.53

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 12**  
**SLAB Revisions - Acknowledgement of Consent to Transporter**  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Shipment							Cost of All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>U.S. Exporter Provides Copy of the EPA Acknowledgement of Consent to Transporter</b>										
Find consent document	0	0	0.17	0.17	\$5.75	\$0.00	\$5.75	16,154	2,746.18	\$92,958.19
Copy consent document	0	0	0.08	0.08	\$2.81	\$0.22	\$3.03	16,154	1,340.78	\$48,939.35
<b>Total</b>	0	0	0.25	0.25	\$8.56	\$0.22	\$8.78	16,154	4,086.96	\$141,897.54

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 13**  
***SLAB Revisions* - Recordkeeping**  
**For SLAB Exports to non-OECD Countries, Canada and Mexico**

Activity	Cost per Entity							Cost of All Entities		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Entities <sup>c</sup>	Total Hours	Total Cost
<b>U.S. Exporter Recordkeeping</b>										
File and maintain necessary documents	0	0	0.25	0.25	\$8.46	\$0.00	\$8.46	640	160.00	\$5,416.00
<b>Total</b>	0	0	0.25	0.25	\$8.46	\$0.00	\$8.46	640	160.00	\$5,416.00

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of the Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.4 of the Cost Assessment document for the final rule.

**Exhibit 14**  
**Import Consent Documentation - Receiving Facility Submission to EPA**

Activity	Cost Per Shipment							Cost for All Shipments		
	Managerial Staff Hours	Technical Staff Hours	Clerical Staff Hours	Total Hours	Labor Cost <sup>a</sup>	O&M Cost <sup>b</sup>	Total Cost	Number of Shipments <sup>c</sup>	Total Hours	Total Cost
<b>Receiving Facility Submission to EPA</b>										
<b>Importers</b>										
Find Consent Document	0	0	0.17	0.17	\$5.75	\$0.00	\$5.75	2,712	461.04	\$15,606.20
Match Consent Document to Manifest	0	0	0.17	0.17	\$5.75	\$0.00	\$5.75	2,712	461.04	\$15,606.20
Copy Consent Document	0	0	0.083	0.083	\$2.81	\$0.22	\$3.03	2,712	225.10	\$8216.14
Submit Consent to EPA	0	0	0	0	\$0.00	\$0.00	\$0.00	2,712	0	\$0.00
<b>Total</b>	0	0	0.42	0.42	\$14.32	\$0.22	\$14.54	2,712	1,147.18	\$39,428.55
<b>EPA</b>										
Receive and File Consent Document	0	0	0.083	0.083	\$2.47	\$0.00	\$2.47	2,712	225.10	\$6,698.86
<b>Total</b>	0	0	0.083	0.083	\$2.47	\$0.00	\$2.47	2,712	225.10	\$6,698.86

<sup>a</sup> Based on hourly rates discussed in Section 3.1 of Cost Assessment document for the final rule.

<sup>b</sup> Based on materials costs discussed in Section 3.2 of the Cost Assessment document for the final rule.

<sup>c</sup> Based on universe assumptions discussed in Section 3.5 and Section 4.3.1 of the Cost Assessment document for the final rule.



**Exhibit 15**  
**Total Annual Estimated Respondent Burden**

ICR Name	ICR Number	Total Hours/Year	Labor Cost/Year	Capital Cost/Year	O&M Cost/Year	Total Cost/Year
<b>OECD Revisions:</b>						
Reading the Rule (Year 1 only)	2308.01	63.00	\$4,793.88	0	\$0.00	\$4,793.88
Exemption for Wastes Destined for Laboratory Analysis	2308.01	-43.00	-\$2,182.63	0	-\$42.40	-\$2,225.14
Certificate of Recovery	2308.01	210.70	\$8,959.11	0	\$106.56	\$9,065.67
Exchange and Accumulation Recovery Operations	2308.01	44.34	\$1,945.51	0	\$54.00	\$1,999.51
Return of Wastes	2308.01	0.45	\$21.40	0	\$0.44	\$21.84
<b>Subtotal</b>		<b>275.49</b>	<b>\$13,537.26</b>	<b>\$0.00</b>	<b>\$118.60</b>	<b>\$13,655.76</b>
<b>SLAB Revisions -- for SLAB Exports to non-OECD Countries, Canada and Mexico:</b>						
Reading the Rule (Year 1 only)	2308.01	5,990.00	\$446,207.12	0	\$0.00	\$446,207.12
Notification	2308.01	1,002.00	64,839.42	0	\$280.56	\$65,119.98
Renotification	2308.01	47.30	\$2,544.14	0	\$18.06	\$2,562.20
Annual Report	2308.01	2,140.90	\$115,297.69	0	\$2,713.60	\$118,011.29
Additional Report	2308.01	2.00	\$98.56	0	\$8.48	\$107.04
Acknowledgement of Consent to Transporter	2308.01	4,086.96	\$138,343.66	0	\$3,553.88	\$141,897.54
Recordkeeping	2308.01	160.00	\$5,416.00	0	\$0.00	\$5,416.00
<b>Subtotal</b>		<b>13,431.16</b>	<b>\$772,746.59</b>	<b>\$0.00</b>	<b>\$6,574.58</b>	<b>\$779,321.17</b>
<b>Import Consent Documentation:</b>						
Receiving Facility Submission to EPA	2308.01	1,147.18	\$38,831.91	0	\$596.64	\$39,428.55
<b>Subtotal</b>		<b>1,147.18</b>	<b>\$38,831.91</b>	<b>\$0.00</b>	<b>\$596.64</b>	<b>\$39,428.55</b>
<b>TOTAL for Year 1</b>		<b>14,853.83</b>	<b>\$825,115.76</b>	<b>\$0.00</b>	<b>\$7,289.82</b>	<b>\$832,405.47</b>
<b>TOTAL for Year 2 and beyond</b>		<b>8,798.83</b>	<b>\$374,114.76</b>		<b>\$7,289.82</b>	<b>\$381,404.47</b>
<b>THREE-YEAR TOTAL (Year 1+Year 2+Year 3):</b>		<b>32,451.48</b>	<b>\$1,573,345.27</b>		<b>\$21,869.46</b>	<b>\$1,595,214.41</b>
<b>THREE-YEAR AVERAGE (Year 1+Year 2+Year 3):</b>		<b>10,817.16</b>	<b>\$524,448.42</b>		<b>\$7,289.82</b>	<b>\$531,738.14</b>

**Exhibit 16**  
**Summary of New and Existing Annual Respondent Hour and Cost Burden**

ICR Name	ICR Number	Total Hours/Year	Labor Cost/Year	Capital Cost/Year	O&M Cost/Year	Total Cost/Year
<b>New Paperwork Requirements</b>						
Revisions to the Requirements for Transboundary Shipments of Wastes between OECD Countries, to the Requirements for Export Shipments of Spent Lead Acid Batteries, to the Requirements on Submitting Exception Reports for Export Shipments of Hazardous Wastes, and to the Requirements for Import Shipments of Hazardous Wastes	2308.02	10,817	\$524,448	\$0	\$7,290	\$531,738
<b>Existing Paperwork Requirements</b>						
Hazardous Waste Generator Standards*	820.10					
-- Exporter Requirements		4,389	\$129,460	-----	\$1,401	\$130,861
-- Importer-Exporter Requirements OECD and Bilateral		324	\$9,678	-----	\$182	\$9,859
General Hazardous Waste Facility Standards**	1571.08					
-- Foreign Shipment Import Report (264.12(a) and 265.12(a))		166	\$188	0	0.33	\$10,418
Notification of Regulated Waste Activity***	0261.15	100,307	\$9,454,718	0	\$234,843	\$9,689,561
<b>Subtotal</b>		<b>105,186</b>	<b>\$9,594,044</b>	<b>\$0</b>	<b>\$236,426</b>	<b>\$9,840,699</b>
<b>TOTAL</b>		<b>116,003</b>	<b>\$10,118,492</b>	<b>\$0</b>	<b>\$243,716</b>	<b>\$10,372,437</b>

\* See Exhibit 9 of the Supporting Statement for EPA Information Collection Request Number 0820.10 Hazardous Waste Generator Standards, January 2008

\*\* See Exhibit 1 of the Supporting Statement for EPA Information Collection Request 1571.08 "General Hazardous Waste Facility Standards," February 2006

\*\*\* See Exhibit 3 of the Supporting Statement for EPA Information Collection Request Number 261.15 "Notification of Regulated Waste Activity," January 2006

**Exhibit 17**  
**Total Annual Estimated Agency Burden**

ICR Name	ICR Number	Total Hours/Year	Labor Cost/Year	Capital Cost/Year	O&M Cost/Year	Total Cost/Year
<b>OECD Revisions:</b>						
Reading the Rule	2308.01	0.00	0	0	0	0
Exemption for Wastes Destined for Laboratory Analysis	2308.01	-39.20	-\$1,659.79	0	-\$7.20	-\$1,666.96
Certificate of Recovery	2308.01	77.50	\$2,306.40	0	\$0.00	\$2,306.40
Exchange and Accumulation Recovery Operations	2308.01	5.70	\$169.63	0	\$0.00	\$169.63
Return of Wastes	2308.01	0.60	\$28.64	0	\$0.12	\$28.76
<b>Subtotal</b>		<b>44.60</b>	<b>\$844.88</b>	<b>\$0.00</b>	<b>-\$7.08</b>	<b>\$837.83</b>
<b>SLAB Revisions -- for SLAB Exports to non-OECD Countries, Canada and Mexico:</b>						
Reading the Rule	2308.01	0.00	0	0	0	0
Notification	2308.01	1,382.76	\$55,559.70	0	\$320.64	\$55,880.34
Renotification	2308.01	67.51	\$2,472.85	0	\$20.64	\$2,493.49
Annual Report	2308.01	384.00	\$12,808.32	0	\$0.00	\$12,808.32
Additional Report	2308.01	1.64	\$48.81	0	\$0.72	\$49.53
Acknowledgement of Consent to Transporter	2308.01	0.00	0	0	0	0
Recordkeeping	2308.01	0.00	0	0	0	0
<b>Subtotal</b>		<b>1,835.91</b>	<b>\$70,889.68</b>	<b>\$0.00</b>	<b>\$342.00</b>	<b>\$71,231.68</b>
<b>Import Consent Documentation:</b>						
Receiving Facility Submission to EPA	2308.01	225.10	\$6,698.86	0	\$0.00	\$6,698.86
<b>Subtotal</b>		<b>225.10</b>	<b>\$6,698.86</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$6,698.86</b>
<b>TOTAL</b>		<b>2,105.61</b>	<b>\$78,433.41</b>	<b>\$0.00</b>	<b>\$334.92</b>	<b>\$78,768.37</b>