

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	
2	Supporting Statement for EPA ICR 1361.12																						
3	May-08																						
4	EXHIBIT 2: Respondent Net Burden																						
6		Hours and Costs (or Savings) Per Respondent or Activity								Total Hours and Costs (or Savings)			Total Cost (or Savings) Breakdown			Reporting (RP) vs. Recordkeeping (RK)	Reporting vs. Recordkeeping						
7																							
8		Legal	Manager	Technical	Clerical/Maint	Respon.	Labor	Capital/		No. of	Total	Total											
9		\$124.59	\$94.78	\$72.92	\$35.11	Hours per Activity	Cost per Activity	Startup Cost	O & M Cost	Respondents or Activities/yr	Hours per Year	Cost per Year	Labor	Capital	O&M		No. Responses	Total Hours	Capital/O&M	No. Responses	Total Hours	Capital/O&M	
10	INFORMATION COLLECTION ACTIVITY																						
11	Reading the Regulations																						
12	Read the Regulation	0.0	3.0	2.0	0.0	5.0	\$430	\$0	\$0	6	30	\$2,599	\$2,599	\$0	\$0	RK					6	30	\$0
13																							
14	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	6	30	\$2,599	\$2,599	\$0	\$0						6	30	\$0
15																							
16	Notices 261.38(b)(2)																						
17	(i) Generator-One time notice to Regional or State RCRA and CAA Directors	0.0	1.0	0.0	2.0	3.0	\$165	\$0	\$0	3	10	\$530	\$530	\$0	\$0	RP	3	10	\$0				
18	(ii) Burner- Publish public notice in major newspaper	0.0	0.5	0.0	0.0	0.5	\$47	\$0	\$500	5	3	\$2,894	\$251	\$0	\$2,643	RP	5	3	\$2,643				
19																							
20	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	8	12	\$3,423	\$780	\$0	\$2,643		8	12	\$2,643	0	0	\$0	
21																							
22	ECF analysis plans for burners of ECF 261.38(b)(5)																						
23	Burners -Test for heating value and composition of ECF constituents in primary fuel	0.0	0.0	0.0	0.0	0.0	\$0	\$0	\$300	3	0	\$900	\$0	\$0	\$900	RK					3	0	\$900
24	Emission-comparable fuel sampling and analysis 261.38(b)(6)																						
25	Generators-Annual testing for constituents	0.0	0.0	0.0	0.0	0.0	\$0	\$0	\$8,100	153	0	\$1,239,300	\$0	\$0	\$1,239,300	RK					153	0	\$1,239,300
26																							
27	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	156	0.0	\$1,240,200	\$0	\$0	\$1,240,200						156.0	0.0	\$1,240,200
28																							
29																							
30	Operating Record 261.38(b)(8)																						
31	(i)-(viii) Maintain records of information submitted to implementing authority, facility info,process description, waste codes/quantities, waste analysis plan, analytical methods/results/detection limits, process knowledge certification	0.0	1.0	8.0	16.0	25.0	\$1,240	\$0	\$0	29	725	\$35,957	\$35,957	\$0	\$0	RK					29	725	\$0
32	(vii) If the waste is to be shipped off-site, maintain a certification from the burner as required under paragraph 261.38(b)(10)	0.0	0.0	0.0	0.5	0.5	\$18	\$0	\$0	30	15	\$527	\$527	\$0	\$0	RK					30	15	\$0
33	Manifests of HW shipments	0.0	0.3	0.0	0.9	1.1	\$54	\$0	\$1	-5,104	-5,614	-\$278,353	-\$273,249	\$0	-\$5,104	RK					-5,104	-5,614	-\$5,104
34	Burner certification 261.38(b)(10)																						
35	For offsite shipments generators obtain 1-time certification from burner stipulating that ECF will be stored in accordance with 261.38 (c) (1) and burned as stipulated in 261.38 9(c) (2)	0.0	1.0	2.0	0.0	3.0	\$241	\$0	\$0	3	8	\$681	\$681	\$0	\$0	RK					3	8	\$0
36																							
37	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	-5,042	-4,866	-\$241,188	-\$236,084	\$0	-\$5,104						-5,042	-4,866	-\$5,104
38																							
39																							
40	Special conditions for emission-comparable fuel 261.38(c)																						
41	Storage - Above Ground Tank Systems 261.38(c)(ii)																						
42	(A) SPCC Requirements																						
43	Renewal of SPCC Plan per 112.7: Including physical layout of the facility,describing discharge prevention measures and discharge/drainage controls, Countermeasures for discharge discovery, response and cleanup and disposal methods	0.0	1.1	8.7	1.6	11.5	\$798	\$0	\$0	9	104	\$7,272	\$7,272	\$0	\$0	RP	9	104	\$0				
44	Obtain PE Certification for SPCC Plan	0.0	0.0	0.0	0.0	0.0	\$0	\$0	\$290	9	0	\$2,645	\$0	\$0	\$2,645	RK					9	0	\$2,645
45																							
46	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	18	104	\$9,917	\$7,272	\$0	\$2,645		9	104	\$0	9	0	\$2,645	
47																							
48	(B) Containment and detection of releases																						
49	Secondary containment systems																						

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	
		Hours and Costs (or Savings) Per Respondent or Activity								Total Hours and Costs (or Savings)			Total Cost (or Savings) Breakdown			Reporting (RP) vs. Recordkeeping (RK)	Reporting vs. Recordkeeping						
		Legal	Manager	Technical	Clerical/Maint	Respon.	Labor	Capital/		No. of	Total	Total						Reporting			Recordkeeping		
						Hours per Activity	Cost per Activity	Startup Cost	O & M Cost	Respondents or Activities/yr	Hours per Year	Cost per Year	Labor	Capital	O&M		No. Responses	Total Hours	Capital/O&M	No. Responses	Total Hours	Capital/O&M	
6																							
7																							
8																							
9		\$124.59	\$94.78	\$72.92	\$35.11																		
50	Install engineered secondary containment for all ECF storage tanks (E.g A liner (external to the tank) , a vault, a double wall) with built in continuous leak detection per 261.38 (c)(1)(iv) and appropriate containment for portable ECF containers	0.0	0.0	0.0	0.0	0.0	\$0	\$13,359	\$0	6	0	\$76,273	\$0	\$76,273	\$0	RK				6	0	\$76,273	
51	Inspect tanks, piping, and ancillary equipment (pumps/valves) and VOC monitoring	0.0	0.0	0.4	2.1	2.5	\$104	\$0	\$0	2,704	6,753	\$280,046	\$280,046	\$0	\$0	RK				2,704	6,753	\$0	
52	Security-Burners 261.38 (c) (1)(iii)(D)	0.0	0.0	0.0	0.0	0.0	\$0	\$0	\$300	30	0	\$9,000	\$0	\$0	\$9,000	RK				30	0	\$9,000	
53	Testing/Maintenance of equipment 261.38 (c)(1)(v)(A)(2) - Burners	0.0	0.5	0.0	2.0	2.5	\$118	\$0	\$100	30	75	\$6,528	\$3,528	\$0	\$3,000	RK				30	75	\$3,000	
54	Emergency response 261.38 (c)(1)(v)(B)(2) - Burners	0.0	0.5	1.0	2.0	3.5	\$191	\$0	\$0	6	21	\$1,143	\$1,143	\$0	\$0	RP	6	21	\$0				
55	Cessation and containment of leaks	0.0	8.0	4.0	4.0	16.0	\$1,190	\$0	\$471	90	1,440	\$149,544	\$107,132	\$0	\$42,412	RK				90	1,440	\$42,412	
56	Notification and reporting of leaks	0.0	9.0	4.0	5.0	18.0	\$1,320	\$0	\$0	90	1,620	\$118,823	\$118,823	\$0	\$0	RP	90	1,620	\$0				
57																							
58	SUBTOTAL		Varies	Varies	Varies	Varies	Varies	Varies	Varies	2,956	9,909	\$641,357	\$510,673	\$76,273	\$54,412		96	1,641	\$0	2,860	8,288	\$130,685	
59																							
60																							
61	Air emissions Controls 261.38(c) (1)(ii)(C)																						
62	Install level 2 air emissions controls under the Organic Liquids Distribution NESHAP 40 CFR , Part 63, subpart EEEE - Burners	0.0	0.0	0.0	0.0	0.0	\$0	\$4,366	\$4,366	5	0	\$44,579	\$0	\$22,289	\$22,289	RK				5	0	\$44,579	
63	Maintain records of inspections, performance tests, & defective equipment - Burners	0.0	3.0	11.1	10.3	24.4	\$1,455	\$0	\$0	30	732	\$43,662	\$43,662	\$0	\$0	RK				30	732	\$0	
64	Hazardous Waste Management/Disposal Savings	0.5	2.0	5	35	42.5	\$1,845	\$0	\$1,769	-1,508	-64,090	-\$5,451,061	-\$2,782,720	\$0	-\$2,668,341	RP/RK	-754	-32,045	-\$1,334,171	-754	-32,045	-\$1,334,171	
65																							
66	SUBTOTAL		Varies	Varies	Varies	Varies	Varies	Varies	Varies	-1,473	-63,358	-\$5,362,821	-\$2,739,058	\$22,289	-\$2,646,052		-754	-32,045	-\$1,334,171	-719	-31,313	-\$1,289,592	
67																							
68																							
69	Burning 261.38(c) (2)																						
70	Automatic Waste Fuel Cutoff 261.38(c) (2)(F)																						
71	Install AWFCO	0.0	0.0	0.0	0.0	0.0	\$0	\$1,900	\$1,900	7	0	\$28,134	\$0.00	\$14,067	\$14,067	RK				7	0	\$28,134	
72	Investigate instances when AWFCO occurs and take corrective action	0.0	0.0	1.0	2.0	3.0	\$143	\$0	\$0	4	11	\$530	\$530	\$0	\$0	RK				4	11	\$0	
73	Submit a written report within 5 calendar days for each of 10 exceedances of the CO emission limit	0.0	0.5	3.0	0.0	3.5	\$266	\$0	\$0	0	0	\$20	\$20	\$0	\$0	RP	0	0	\$0				
74	Test the automatic emission-comparable fuel feed cutoff system and associated alarms weekly	0.0	0.0	0.0	0.3	0.3	\$9	\$0	\$0	346	87	\$3,041	\$3,041	\$0	\$0	RP	346	87	\$0				
75	CO CEMS 261.38(c) (2)(C)																						
76	Install CO CEMS.	0.0	0.0	0.0	0.0	0.0	\$0	\$2,900	\$2,900	7	0	\$42,941	\$0	\$3,057	\$21,471	RP	7	0	\$24,527				
77	Maintain, calibrate CO CEMS and record data	0.0	82.1	164.3	246.4	492.8	\$28,411	\$0	\$0	52	25,623	\$1,477,379	\$1,477,379	\$0	\$0	RP	52	25,623	\$0				
78	Dioxin/furan control 261.38(c) (2)(D)																						
79	Install temperature monitoring device	0.0	0.0	0.0	1.0	1.0	\$35	\$50	\$50	1	0	\$14	\$4	\$5	\$5	RP	1	0	\$11				
80	Atomization Systems																						
81	Install atomization system	0.0	0.5	0.5	1.0	2.0	\$119	\$263	\$88	4	7	\$1,736	\$440	\$972	\$324	RP	4	7	\$1,296				
82																							
83	SUBTOTAL		Varies	Varies	Varies	Varies	Varies	Varies	Varies	422	25,728	\$1,553,795	\$1,481,414	\$18,101	\$35,867		410	25,717	\$25,834	11	11	\$28,134	
84																							
85	BIF/MACT COMPLIANCE SAVINGS																						
86	Comprehensive Performance Test 63.1207(b)	0.0	702.5	242.0	94.0	1039	\$87,530	\$30,029	\$30,029	-2	-507	-\$71,991	-\$42,695	-\$14,648	-\$14,648	RP	-2	-507	-\$29,295				
87	One Time DF Test 63.1207(b)	0.0	5.0	30.0	5.0	40	\$2,837	\$2,500	\$2,500	-2	-8	-\$1,480	-\$536	-\$472	-\$472	RP	-2	-8	-\$944				
88	Site Specific Risk Assessment	0.0	0.0	0.0	0.0	0	\$0	\$150,000	\$150,000	-2	0	-\$56,636	\$0	-\$28,318	-\$28,318	RP	-2	0	-\$56,636				
89	Startup-Shutdown & Malfunction Plan (63.1206 (c))	0.0	7.0	55.0	11.5	74	\$5,078	\$0	\$0	-2	-14	-\$959	-\$959	\$0	\$0	RK				-2	-14	\$0	
90	Initial Notification & Documentation of Compliance	0.0	15.5	86.0	5.0	107	\$7,916	\$0	\$0	-4	-40	-\$2,989	-\$2,989	\$0	\$0	RP	-4	-40	\$0				
91																							
92	SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	-12	-568	-\$134,053	-\$47,178	-\$43,437	-\$43,437		-10	-554	-\$86,875	-2	-14	\$0	
93																							
94	EPA Identification Number 261.38(c) (4)																						
95	Burners-Obtain an EPA identification number	0.0	1.0	1.0	0.0	2.0	\$168	\$0	\$0	30	60	\$475	\$475	\$0	\$0	RP	30	60	\$0				
96	Notification, reporting, and recordkeeping 261.38(c) (5)																						

	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	
6		Hours and Costs (or Savings) Per Respondent or Activity								Total Hours and Costs (or Savings)			Total Cost (or Savings) Breakdown			Reporting (RP) vs. Recordkeeping (RK)	Reporting vs. Recordkeeping						
7		Legal	Manager	Technical	Clerical/Maint	Respon.	Labor	Capital/		No. of	Total	Total						Reporting		Recordkeeping			
8						Hours per	Cost per	Startup	O & M	Respondents	Hours per	Cost per Year	Labor	Capital	O&M			No.	Total Hours	Capital/O&M	No.	Total Hours	Capital/O&M
9		\$124.59	\$94.78	\$72.92	\$35.11	Activity	Activity	Cost	Cost	or Activities/yr	Year							Responses			Responses		
97	Burner provide Initial notification and certification of storage and operating Conditions to RCRA or CAA authority	0.0	1.0	1.0	0.0	2.0	\$168	\$0	\$0	6	12	\$981	\$93	\$0	\$0	RP	6	12	\$0				
98	ECF Burned in an onsite Unaffiliated Boiler																						
99	Make reasonable efforts to ensure burner complies with storage and burning conditions of the exclusion.	0.0	3.0	4.0	12.0	19.0	\$997	\$0	\$0	6	37	\$1,928	\$546	\$0	\$0	RK					6	37	\$0
100																							
101	SUBTOTAL		Varies	Varies	Varies	Varies	Varies	Varies	Varies	42	108	3385	1114	0	0		36	72	0	6	37	0	
102																							
103	GRAND TOTAL		Varies	Varies	Varies	Varies	Varies	Varies	Varies	(2,919)	(32,899)	(2,283,386)	(1,018,469)	73,226	(1,358,827)		(204)	(5,053)	(1,392,569)	(2,715)	(27,846)	106,968	
104																							

	Hours and Costs Per Respondent or Activity								Total Hours and Costs				Reporting (RP) vs. Recordkeeping (RK)	Reporting vs. Recordkeeping					
	Legal	Manager	Technical	Clerical/Maint	Total	Labor	Capital	Capital/O&M Costs/Yr	No of respondents/ activities	Total Hours per Year	Total Cost Per Year	Total Capital/O&M Costs/Yr		Reporting			Recordkeeping		
	\$73.14	\$68.38	\$50.14	\$23.49	Hours per	Cost per	Startup							No. Responses	Total Hours	Capital/ O&M Costs/Yr	No. Responses	Total Hours	Capital/ O&M Costs/Yr
INFORMATION COLLECTION ACTIVITY																			
Notices 261.38(b)(2)																			
Review notice by generator certifying compliance with the exclusion	0.0	1.0	3.0	5.0	9.0	\$336	\$0	\$3	11	10	\$363	\$34	RP/RK	6	5	\$17	6	5	\$17
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	11	10	\$363	\$34		6	5	\$17	6	5	\$17
Special conditions for emission-comparable fuel 261.38(c)																			
Storage - Above Ground Tank Systems 261.38(c)(ii)																			
Secondary Containment - Cessation and containment of leaks, reporting																			
Review the report of leaks from generators or burners and ensure proper procedures were followed.	0.0	0.0	1.0	0.3	1.3	\$56	\$0	\$2	29	5	\$240	\$58	RK				29	5	\$58
Emergency procedure																			
Review incident reports	0.0	0.5	1.0	0.5	2.0	\$96	\$0	\$2	2	1	\$27	\$4	RK				2	1	\$4
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	31	6	\$267	\$62		0	0	\$0	31	6	\$62
EPA Identification Number 261.38(c)(4)																			
Review information from burner and provide EPA identification number	0.0	0.0	0.5	1.0	1.5	\$49	\$0	\$3	17	26	\$84	\$52	RP/RK	9	13	\$26	9	13	\$26
Notification, reporting, and recordkeeping 261.38(c)(5)																			
Review one-time notice from burners	0.0	0.5	1.0	2.0	3.5	\$131	\$0	\$0	17	6	\$215	\$0	RK				17	6	\$0
Review excessive CO exceedence reports	0.0	0.5	2.0	2.0	4.5	\$181	\$0	\$0	0.3	0	\$6	\$0	RK				0	0	\$0
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	35	32	\$305	\$52		9	13	\$26	26	19	\$26
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	77	47	\$934	\$148		14	18	\$43	63	29	\$105

	Hours and Costs Per Respondent or Activity								Total Hours and Costs				Reporting (RP) vs. Recordkeeping (RK)	Reporting vs. Recordkeeping					
	Legal	Manager	Technical	Clerical/Maint	Total	Labor	Capital	Capital/O&M Costs/Yr	No of	Total	Total	Total		Reporting			Recordkeeping		
	\$73.14	\$68.38	\$50.14	\$23.49	respondents/ activities	Hours per Year	Cost Per Year		of Activities	Hours per Year	Cost Per Yr	Capital/O&M Costs/Yr		No. Responses	Total Hours	Capital/ O&M Costs/Yr	No. Responses	Total Hours	Capital/ O&M Costs/Yr
INFORMATION COLLECTION ACTIVITY																			
Notices 261.38(b)(2)																			
Review notice by generator certifying compliance with the exclusion	0.0	1.0	3.0	5.0	9.0	\$336	\$0	\$3	23	19	\$726	\$68	RP/RK	11	10	\$34	11	10	\$34
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	23	19	\$726	\$68		11	10	\$34	11	10	\$34
Special conditions for emission-comparable fuel 261.38(c)																			
Storage - Above Ground Tank Systems 261.38(c)(ii)																			
Secondary Containment - Cessation and containment of leaks, reporting																			
Review the report of leaks from generators or burners and ensure proper procedures were followed.	0.0	0.0	1.0	0.3	1.3	\$56	\$0	\$2	58	10	\$479	\$116	RK				58	10	\$116
Emergency procedure																			
Review incident reports	0.0	0.5	1.0	0.5	2.0	\$96	\$0	\$2	4	1	\$54	\$8	RK				4	1	\$8
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	62	11	\$533	\$124		0	0	\$0	62	11	\$124
EPA Identification Number 261.38(c)(4)																			
Review information from burner and provide EPA identification number	0.0	0.0	0.5	1.0	1.5	\$49	\$0	\$3	35	52	\$169	\$104	RP/RK	17	26	\$52	17	26	\$52
Notification, reporting, and recordkeeping 261.38(c)(5)																			
Review one-time notice from burners	0.0	0.5	1.0	2.0	3.5	\$131	\$0	\$0	35	11	\$430	\$0	RK				35	11	\$0
Review excessive CO exceedance reports	0.0	0.5	2.0	2.0	4.5	\$181	\$0	\$0	0.7	0	\$11	\$0	RK				1	0	\$0
SUBTOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	70	63	\$610	\$104		17	26	\$52	53	37	\$52
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	155	94	\$1,869	\$296		29	36	\$86	126	59	\$210