

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 0976.15  
“2011 HAZARDOUS WASTE REPORT, NOTIFICATION OF  
REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS  
WASTE PERMIT APPLICATION AND MODIFICATION”**

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United States Environmental Protection Agency  
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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 “2011 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” EPA ICR Number 0976.15, OMB Number 2050-0024.

### 1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

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

- **“Notification of Regulated Waste Activity and 2009 Hazardous Waste Report,” EPA ICR Number 0976.14 (OMB Control Number 2050-0024).** EPA ICR Number 0976.14 addresses the following information collection requirements:
  - Notification requirements under the Resource Conservation and Recovery Act (RCRA) Section 3010; 40 CFR 260.42 (hazardous secondary material activity); 40 CFR Part 262, Subpart K (alternative generator standards for academic laboratories); 40 CFR Part 273, Subpart C (universal waste activity); and 40 CFR Part 279 (used oil activity). EPA Form 8700-12 is used by facilities to satisfy this requirement.
  - Hazardous Waste Report requirements of Sections 3002 and 3004 of RCRA, as amended, which require reporting to EPA or to authorized States at least every two years. The Hazardous Waste Report [EPA Form 8700-13 Form A/B], or comparable State report, is used by generators and Treatment, Storage, and Disposal facilities (TSDFs) to satisfy this requirement.
- **“RCRA Hazardous Waste Permit Application and Modification, Part A,” EPA ICR Number 0262.12 (OMB Control Number 2050-0034).** Sections 3004 and 3005 of RCRA, as amended, require anyone who owns or operates a facility where hazardous waste is treated, stored, or disposed to have a RCRA hazardous waste permit issued by EPA. There are two parts to a RCRA hazardous waste permit application: Part A and Part B. Part A consists of EPA Form 8700-23, or comparable State form, along with maps, drawings, and photographs, as required by 40 CFR 270.13. Part B contains detailed, site-specific information. There is no form for the Part B Permit Application; rather, the Part B Permit Application must be submitted in narrative form and contain the information described in applicable sections of 40 CFR 270.14 through 270.27. EPA ICR Number 0262.12 addresses the requirements of completing and submitting a Part A Permit Application or modifying a hazardous waste permit by submitting a revised application. The information collection requirements associated with the Part B Application are covered under a separate ICR.

EPA integrated the above two ICRs into this current ICR, EPA ICR Number 0976.15, to ensure consistency and minimize duplication in its burden assumptions and estimates, since both ICRs address some of the same reporting elements under their respective requirements. In particular, both ICRs address the use of the RCRA Subtitle C Site Identification Form (i.e., the Site ID Form). Specifically, the Notification and Hazardous Waste Report ICR addresses: (1) the requirements for all regulated entities to submit the Site ID Form (or alternative document, if specified) to notify EPA or the authorized State; and (2) the requirements for large quantity generators (LQGs)<sup>1</sup> and TSDFs to prepare and submit the Site ID Form as part of their Hazardous Waste Report. The Part A ICR addresses the requirements for all owner/operators of TSDFs to submit the Site ID Form as part of their Part A Permit Applications or Part A Permit Modifications. Incorporating these two ICRs into this current ICR has allowed EPA to more comprehensively estimate the burden of the Site ID Form and other collections, ensure consistency and nonduplication in its analysis, and address recent changes to the Site ID Form.

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

The following paragraphs briefly summarize the information collection requirements covered in this ICR. **NOTE:** As used in this document, the term “respondent” includes:

- Hazardous waste facilities complying with the Hazardous Waste Report, notification, and Part A Permit Application requirements covered in this ICR. This includes:
  - Private sector entities; and
  - State and local government agencies that are regulated entities<sup>2</sup>.
- State agencies administering the RCRA hazardous waste program<sup>3</sup>.

### **(1) Hazardous Waste Report**

RCRA Sections 3002 and 3004, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), require reporting to EPA or to authorized States at least every two years. The Hazardous Waste Report [EPA Form 8700-13 Form A/B], or comparable State report, is used by generators and TSDFs to satisfy this requirement.

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

<sup>2</sup> Addressing State and local government agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the Paperwork Reduction Act (PRA).

<sup>3</sup> Ibid.

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

**(2) Notification of Regulated Waste Activity**

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

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

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

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

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

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

**Table 1**  
**Hazardous Waste Notification Requirements**

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

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

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

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

40 CFR Part 266, Subpart H includes notification requirements for facilities that burn or process hazardous waste in a boiler or industrial furnace (BIF). Subpart H also subjects generators, transporters, and storers (including processors, blenders, and distributors of hazardous waste fuel) of hazardous waste that is burned or processed in a BIF to the notification requirements of 40 CFR Parts 262, 263, and 264 and 265, respectively. Specifically, sections 266.100(c)(1)(i) and 266.100(f)(1) require that owners or operators of smelting, melting, and refining furnaces that processes hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals, respectively, to provide a written, one-time notification of their hazardous waste activities. In addition, sections 266.101(a), 266.101(b), and 266.101(c) require that generators, transporters, and storers of hazardous waste that is burned or processed in a BIF follow specific notification requirements and procedures of sections 262.12, 263.11, and 264.11 and 265.11, respectively. Further, sections 266.102(a)(2)(ii) and 266.103(a)(4)(ii) subject owners or operators of permitted and interim status BIFs that burn or process hazardous waste, respectively, to 40 CFR Parts 264 and 265, Subpart B, which includes the section 264.11 and 265.11 notification requirements. Finally, section 266.108(d) requires that facilities that qualify for the small quantity on-site burner exemption to provide a written, one-time notification of their hazardous waste activities.

40 CFR Part 270 prescribes the timing for notification of hazardous waste activities due to the listing of a hazardous waste in 40 CFR Part 261. Specifically, section 270.1(b) requires that “not later than 90 days after the promulgation or revision of regulations in Part 261 (identifying and listing hazardous wastes), generators and transporters of hazardous waste, and

owners or operators of hazardous waste treatment, storage, or disposal facilities may be required to file a notification of that activity under Section 3010.”

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

**Table 2**  
**Used Oil Notification Requirements**

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

**(3) Part A Hazardous Waste Permit Application and Modification**

**(a) Part A Permit Application**

40 CFR Part 270 contains requirements for submitting and modifying a Part A Permit Application. The Part A Permit Application contains the general information required in §270.13. That information includes names and addresses of the owner and operator of the facility and the activities conducted at the facility that requires a RCRA permit. The applicant must also provide information on the location of the facility, including a map, and what hazardous wastes are being managed and the processes involved in the waste management. Section 270.11 specifies the signature requirements for Part A Permit Applications and reports.

**(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations**

Section 270.72 identifies the types of changes requiring interim status facilities or owners/operators of permitted facilities with newly regulated units to submit a revised Part A Permit Application, associated justifications, and compliance demonstrations. The changes that require a revised Part A include managing wastes not listed on the original Part A, increasing the design capacity of the facility, and changing the processes or adding new units for treating, storing, or disposing of the waste. In all cases, the owner must include justification for the change, and the Director must approve the changes. If the owner or operator changes, which also requires a revised Part A, both the old and new owner or operator must demonstrate that the financial responsibility requirements of 40 CFR part 265, subpart H will continue uninterrupted during the change.

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

### **2(a) NEED AND AUTHORITY FOR THE COLLECTION**

#### **(1) Hazardous Waste Report**

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

Section 3002(a)(6) requires submission of reports to EPA or the States at least every two years on the: (1) quantities and nature of hazardous wastes that have been generated during the year and (2) disposition of these hazardous wastes.

Section 3004(a) requires EPA to issue regulations establishing performance standards applicable to owners and operators of facilities for the treatment, storage, or disposal of hazardous waste that include reporting and maintaining records of all hazardous wastes treated, stored, or disposed and the manner in which such wastes were treated, stored, or disposed.

There are a number of uses of the Hazardous Waste Report data. EPA uses these data for planning and developing regulations. In addition, Hazardous Waste Report data allows the Agency to determine whether its regulations are having the desired effect on the generation and management of hazardous waste. For example, Hazardous Waste Report data provides information on whether wastes have shifted from one method of disposal to another. Some State uses of Hazardous Waste Report data include: support of planning, fee assessment, compliance monitoring, and enforcement.

#### **(2) Notification of Regulated Waste Activity**

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

### **(3) Part A Hazardous Waste Permit Application and Modification**

EPA promulgated regulations at 40 CFR 270.1 requiring owners or operators of TSDFs to submit a Part A Permit Application. EPA needs information contained in the Part A Permit Application to identify the person(s) legally responsible for hazardous waste activity, to determine which facilities require permits under more than one program, to assess potential for the facility to pollute nearby ground and surface waters, to identify the time frame available for EPA to process permit applications, and to define the specific wastes a facility is legally allowed to handle for different purposes.

EPA promulgated regulations at 40 CFR 270.72 outlining changes that require owners or operators to submit revised Part A Permit Applications. Section 270.72(a)(1)-(3) requires owner/operators to submit both a revised Part A Permit Application and a written justification for changes in the design capacity of processes used at the facility, and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. Under Section 270.72(a)(4), if an owner or operator changes ownership, or operational control of a facility, the new owner or operator is required to submit a revised Part A Permit Application, and a Subpart H compliance demonstration. EPA needs revised permit applications, justifications, and compliance demonstrations to determine whether desired changes are acceptable or should be more closely reviewed as part of a full permit issuance process.

## **2(b) PRACTICAL UTILITY AND USERS OF THE DATA**

### **(1) Hazardous Waste Report**

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

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

EPA compiles and publishes the *National Biennial RCRA Hazardous Waste Report* based on the data for each odd number reporting year. The reports for 1991 to 2009 are available on the Internet at <http://www.epa.gov/waste/inforesources/data/biennialreport/index.htm>.

EPA and the States have many uses for Hazardous Waste Report information, including:

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

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

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

## **(2) Notification of Regulated Waste Activity**

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

### **(3) Part A Hazardous Waste Permit Application and Modification**

EPA uses information in the Part A Permit Application to define which processes can be used and which wastes can be handled at newly regulated facilities subject to permitting requirements for the first time and permitted facilities with newly regulated units. This includes defining allowable changes in facility operations and applies to new facilities not yet constructed; newly regulated facilities subject to RCRA permitting requirements for the first time; permitted facilities with newly regulated units; and interim status facilities. EPA uses information in the Part A Permit Application to:

- Set priorities for processing permit applications;
- Respond to requests from hazardous waste generators for the names and locations of facilities where they can send their waste for storage, treatment, or disposal;
- Respond to public and Congressional inquiries regarding particular hazardous waste management facilities; and
- Ensure that facilities are not operating in a manner unprotective of human health and the environment.

EPA uses information from revised Part A Permit Applications and associated justifications and Subpart H compliance demonstrations to determine whether desired changes are acceptable under interim status or whether the change should be more closely reviewed as part of a full permit issuance process. In addition, modifying the Part A Permit Application allows inspectors to have up-to-date information on major aspects of the facility, including the size of the operation, the hazardous wastes handled, and the types of processes used. Without this documentation, EPA would be unable to determine the owner or operator's compliance with the management standards of 40 CFR Parts 264 or 265 or the rules governing changes during interim status. This documentation is also useful for both EPA and the owner or operator in an enforcement action.

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

#### **3(a) NONDUPLICATION**

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

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

#### **3(b) PUBLIC NOTICE**

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register on March 29, 2011 (76 FR 17414). The notice indicated that this ICR would combine the “Notification of Regulated Waste Activity and 2011 Hazardous Waste Report” ICR and the “RCRA Hazardous Waste Permit Application and Modification, Part A” ICR. The notice also requested comments on some proposed changes to the Hazardous Waste Report form and instructions designed to clarify long-standing points of confusion. The public comment period extended through May 31, 2011.

EPA received four written comments in response to the Federal Register notice. These comments were submitted by the following organizations:

1. Idaho Department of Environmental Quality;
2. Illinois Environmental Protection Agency;
3. Ohio Environmental Protection Agency; and
4. Texas Commission on Environmental Quality.

The following paragraphs summarize the comments submitted by the above organizations, along with EPA's responses.

#### **(1) Scope of Hazardous Waste Reporting for Episodic Generators**

In the Federal Register notice, EPA explained that episodic generators are those generators that fluctuate between one generator status and another (e.g., move from a SQG to a LQG) one or more times within a calendar year. However, it is unclear whether an episodic generator is required to report only the hazardous waste they generated during the months they were an LQG or whether they are required to report all hazardous waste they generated during the reporting year. EPA requested public comment on modifying the Hazardous Waste instructions to better clarify that LQGs submitting a Hazardous Waste Report must report hazardous wastes they generated for all months of the reporting year.

**Summary of Comments:** Two commenters indicated that interpretation of the current LQG regulations is that facilities are subject to the LQG requirements for the months of the year in which they are a LQG. They stated that a site should not be required to report waste generation activities for the months in which the site is a SQG, CESQG, or Inactive. One of these commenters also indicated that, in order to implement the proposed change, EPA would have to change the regulations for biennial reporting rather than change requirements in the Hazardous Waste Report instructions. The commenter further stated that Hazardous Waste Report instructions are supplemental and should complement, not contradict, the regulations.

**EPA's Response:** EPA agrees with the concerns raised by commenters and therefore, has eliminated the proposed change from the 2011 Hazardous Waste Report instructions and forms.

## (2) Enhancement of Waste Minimization Code List

In the Federal Register notice, EPA explained that, in response to both existing and expanding objectives along with the regulatory reporting requirement, the Agency initiated an effort in the 2009 Hazardous Waste Report cycle to collect waste minimization data. After the 2009 data reporting cycle was complete, some States felt that there were too few waste minimization codes to conduct meaningful analyses. Adding more detailed codes will help provide a better understanding of the dynamics, and trends associated with waste minimization and sustainable materials management nationally, regionally and by State, by industrial sector and by waste stream.

**Summary of Comments:** Three commenters raised questions and concerns on various issues associated with the enhancement of the waste minimization code list. A summary of their comments, by issue, is presented below:

### Use of the waste minimization data

Two commenters indicated that EPA does not give a clear description of the proposed use of the waste minimization data and that, without a planned use, the additional reporting burden is not justifiable. One of these commenters also indicated that it appears that the current waste minimization code list satisfies the regulatory requirement and that an expanded code list would not improve compliance.

One commenter indicated that they have completed analyses using Toxic Release Inventory (TRI) source reduction activity codes data that are similar to the waste minimization codes being proposed. Based on these analyses, the commenter feels that the limited scope of the 2009 waste minimization codes provides an inaccurate description of the overall waste reduction effort completed by a generator since most waste reduction efforts include a combination of activities that often change within the course of the reporting period. The commenter further states that the proposed reporting system fails to account for the complexity and process-specific nature of most hazardous waste generation processes.



### Data on new and on-going waste minimization efforts

One commenter indicated that the emphasis should be on recognizing newly implemented or expanded projects, as opposed to reporting continuing projects that have permanently changed a production process or operating practice and result in no further waste minimization beyond the initial implementation. This commenter recommended changing the language in the Hazardous Waste Report instructions to make it clear that data on new efforts is being sought. The commenter also suggested that, if information will be collected on both new and on-going waste minimization efforts, the reporting system needs to be revised in order to distinguish between new and on-going efforts for a given reporting year or over numerous reporting years. This would require a new data field, which means that companies that translate their data into the reporting software are going to have to alter their software. The commenter believes it is necessary to weigh the burden versus benefit.

Another commenter recommended that, in order to make the data useful, EPA should define a new baseline and require all ongoing and new projects to be reported for that year. In subsequent years, EPA should only collect new waste minimization projects. The commenter also recommended that all ongoing and new waste minimization activities be reported and that a waste minimization code be added which is descriptive of successful ongoing activity and the addition of new activities.

The third commenter indicated that, since all hazardous waste generators are required to have a waste minimization “program in place,” requiring the reporting of ongoing waste minimization efforts is somewhat redundant. Requiring the reporting of new waste minimization efforts might be useful in demonstrating an increase or decrease in the amount of waste minimization occurring. However, these data would provide little information beyond what could be obtained from measuring the total amount of hazardous waste generated and dividing this by the number of generators. Therefore, the need for reporting of whether the waste minimization activity is new or ongoing is of limited use and should be discontinued.

### Definition of “source reduction” and “waste minimization”

One commenter indicated that EPA should clarify the terms “source reduction” and “waste minimization.” The proposed definitions may lead to confusion as they do not define the difference between source reduction (pollution prevention) and waste minimization. The commenter also recommended excluding waste minimization codes A, B, C, D, F, G, and H to minimize the confusion of “source reduction” and “waste minimization” and to ensure that the codes used are reflective of data being collected on Form GM (i.e., waste generated).

### Use of waste minimization data in trends analyses

One commenter indicated that, if the waste minimization codes are going to be used for trend analysis as suggested in the background paper, EPA should provide at least one example of trend analysis that has been done already for other information on the reports (e.g., source codes, form codes).

**EPA's Response:** EPA thanks the commenters for their suggestions and feedback. EPA has deferred revisions, if any, to the waste minimization code list until the 2013 Hazardous Waste Report cycle in order to have adequate time to consider comments and conduct detailed analyses of the waste minimization data currently being collected.

### 3(c) CONSULTATIONS

Most of the data and assumptions in this ICR are based on EPA consultations with industry and States, or data from the Resource Conservation and Recovery Act Information (RCRAInfo) system<sup>4</sup>. In developing this current ICR, EPA carefully reviewed all of the ICR's data and assumptions and determined that a few should be strengthened based on additional consultations. Specifically, EPA conducted consultations on the ICR's assumptions regarding the Hazardous Waste Report.

In conducting the consultations, EPA contacted the three State organizations identified in Table 3.

**Table 3**  
**Organizations EPA Contacted during the Development of this ICR (June 2011)**

Organization	Contact Name	Phone Number
Florida Department of Environmental Protection	Jack Griffith	(850) 245-8748
Illinois Environmental Protection Agency	Hope Wright	(217) 785-2361
Ohio Environmental Protection Agency	Paula Canter	(614) 644-2917

The following paragraphs summarize the feedback obtained on the burden associated with various Hazardous Waste Report activities.

- **Reading the instructions.** EPA was informed that, generally, the ICR's original burden for reading the Hazardous Waste Report instructions (i.e., 2 hours per facility) was a realistic industry average. However, some revisions to this burden estimate were provided. Suggested burdens ranged from 1.25 hours to 5 hours. Based on the consultation information, the average burden for reading the Hazardous Waste Report instructions was estimated to be 2.76 hours per facility.

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<sup>4</sup> RCRAInfo is a national database used by EPA to track entities regulated under Subtitle C of RCRA (i.e., hazardous waste handlers). RCRAInfo includes data on general handler information, waste generation and management, permit or closure status, compliance with Federal and State regulations, and cleanup activities.

- ***Gathering information and preparing Form GM manually.*** EPA was informed that, generally, the ICR's original burden for gathering information and preparing a Form GM manually (i.e., 62 minutes per form) was not a realistic industry average. Suggested burdens ranged from 75 minutes to 90 minutes. Based on the consultation information, the average burden for gathering data (e.g., review manifests and/or other compiled data) and completing Form GM by hand, by typewriter, or by key entering the data using a computer was estimated to be 72 minutes per form.
- ***Gathering information and preparing Form GM by automated method.*** EPA was informed that, generally, the ICR's original burden for gathering information and preparing a Form GM by automated method (i.e., 10 minutes per form) was a realistic industry average. However, some revisions to this burden estimate were provided. Suggested burdens ranged from less than 1 minute to 15 minutes. Based on the consultation information, the average burden for completing Form GM using an in-house, commercial, or State-provided data system (e.g., computer software) was estimated to be 17 minutes per form.
- ***Gathering information and preparing Form WR manually.*** EPA was informed that the ICR's original burden for gathering information and preparing a Form WR manually (i.e., 48 minutes per form) was not a realistic industry average. Suggested burdens ranged from 15 minutes to 75 minutes. Based on the consultation information, the average burden for gathering data (e.g., review manifests and/or other compiled data) and completing Form WR by hand, by typewriter, or by key entering the data using a computer was estimated to be 54 minutes per form.
- ***Gathering information and preparing Form WR by automated method.*** EPA was informed that, generally, the ICR's original burden for gathering information and preparing a Form WR by automated method (i.e., 10 minutes per form) was a realistic industry average. However, some revisions to this burden estimate were provided. Suggested burdens ranged from less than 1 minute to 20 minutes. Based on the consultation information, the average burden for completing Form WR using an in-house, commercial, or State-provided data system (e.g., computer software) was estimated to be 19 minutes per form.
- ***Revisions to in-house or commercial data system.*** EPA was informed that the ICR's original burden for revising in-house or commercial data systems to include new Hazardous Waste Report data items that are not part of a facility's general business operations (i.e., 1 hour per facility) was a realistic industry average. Based on the consultation information, the average burden for revising in-house or commercial data systems for purposes of the Hazardous Waste Report was estimated to be 1 hour per facility.
- ***Submitting report to EPA or State.*** EPA was informed that, generally, the ICR's

original burden for submitting the Hazardous Waste Report to EPA or the State (i.e., 5 minutes per facility) was not a realistic industry average. Suggested hourly burdens ranged from 10 minutes to 2 hours. Based on the consultation information, the average hourly burden for submitting the Hazardous Waste Report was estimated to be 1.34 hours per facility.

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

### **3(d) EFFECTS OF LESS FREQUENT COLLECTION**

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

#### **(1) Hazardous Waste Report**

For the Hazardous Waste Report, the two-year cycle is statutorily required. Although some States collect information on an annual or quarterly basis, EPA does not require more frequent data collection.

#### **(2) Notification of Regulated Waste Activity**

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

notification of used oil management activities and obtain an EPA Identification Number. Any reduction in the frequency of this information collection would prevent the Agency from meeting the statutory requirements of RCRA Section 3010.

### **(3) Part A Hazardous Waste Permit Application and Modification**

A respondent's provision of information on a Part A Permit Application is essentially a one-time exercise that must occur when a facility is new or if an existing facility becomes subject to new permitting requirements. Subsequent revisions to the Part A Permit Application are necessary only if an interim status facility changes its ownership and/or process or management of wastes. EPA strongly believes that if the minimum requirements specified under the regulations are not met, neither the facilities nor EPA can ensure that hazardous wastes are being 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, applicable OMB guidance, and EPA's ICR Handbook. In addition, this information collection complies with EPA's Data Standards and Information Quality Guidelines.

#### **3(f) CONFIDENTIALITY**

##### **(1) Hazardous Waste Report**

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

##### **(2) Notification of Regulated Waste Activity**

The Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the information submitted as part of their notifications. However, if a confidentiality claim were asserted, EPA will treat the information in accordance with the confidentiality regulations at 40 CFR Part 2, Subpart B. EPA also will ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

##### **(3) Part A Hazardous Waste Permit Application and Modification**

All information submitted in a Part A Permit Application or revision will be subject to public disclosure, without notice to the facility, in accordance with the Freedom of Information Act, 5 U.S.C. Section 552, and EPA Freedom of Information Regulations, 40 CFR Part 2. Because of the general nature of the information requested, only a few Part A Permit Applications to date have qualified for exemption to disclosure under the business confidentiality exception. Claims of confidentiality must be clearly indicated on the forms and attachments, and must be accompanied, at the time of filing, by a written substantiation of the claim in accordance with 40 CFR Part 2, Subpart B (particularly the information described at 40 CFR 2.204(e)). Information that is determined to be confidential is placed in a secured "confidential file" for future use. Only persons with special clearance for confidential information have access to these files.

### **3(g) SENSITIVE QUESTIONS**

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

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

##### **4(a) RESPONDENTS AND NAICS CODES**

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

<b>NAICS Code Description</b>	<b>NAICS Code</b>
Agriculture, Forestry, Fishing, and Hunting	11
Mining	21
Utilities	22
Construction	23
Manufacturing	31-33
Wholesale Trade	42
Retail Trade	44-45
Transportation and Warehousing	48-49
Information	51
Finance and Insurance	52
Real Estate, Rental, Leasing	53
Professional, Scientific, and Technical Services	54
Management of Companies and Enterprises	55
Administrative Support, Waste Management, and Remediation	56
Educational Services	61
Health Care and Social Assistance	62
Arts, Entertainment, Recreation	71
Accommodation and Food Services	72
Other Services	81
Public Administration	92

##### **4(b) INFORMATION REQUESTED**

###### **(1) Hazardous Waste Report**

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

As with most of the RCRA program, the Hazardous Waste Report data collection process is delegated to the States. States provide respondents with either the Federal form or a State

equivalent, collect the responses, contact non-respondents, enter the data (or load files if the State employs electronic methods for preparation and submittal of reports by regulated entities) into a database using off-the-shelf software packages which have been developed to support the collection of Hazardous Waste Report data, assure data quality, and forward the data to EPA.

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

(i) Data Items:

- ***RCRA Subtitle C Site Identification Form.*** The Site ID Form must be submitted by all sites required to file the Hazardous Waste Report. This form collects information such as site name, EPA Identification Number, address, contact, and type of hazardous waste generation and management activities taking place at the site; it verifies their information, especially the site's generator status as the date of submission of the report. It requires a certification signature for the submission of the report.
- ***Form GM - Waste Generation and Management.*** Form GM must be submitted by all respondents that generated or shipped large quantity generator amounts of RCRA hazardous waste during the reporting year. This form collects information on each generated waste, including a narrative waste description, a waste characterization (waste codes, source, and form), quantity generated, and the method of waste management (whether managed on-site or shipped off-site).
- ***Form WR - Waste Received From Off-Site.*** Form WR must be submitted by all sites that received RCRA hazardous waste from off-site during the reporting year. This form collects information on each waste received from off-site, including a narrative description of the waste, a brief waste characterization (e.g., waste codes), the EPA Identification Number of the off-site generator, the quantity of waste received, and the method of waste management.
- ***Form OI - Off-Site Identification.*** Form OI is not required by EPA; rather, it is provided as an option for States to collect the names and addresses of transporters, generators that ship waste, and receivers of waste reported on Forms GM and WR where only the EPA Identification Number is listed.



(ii) Respondent Activities:

**Facilities** (i.e., LQGs and TSDFs) must perform the following activities, as applicable:

- Read the Hazardous Waste Report instructions.
- Gather information and complete Site ID Form.
- Gather information and complete Form GM.
- Gather information and complete Form WR.
- Gather information and complete Form OI if required by the State (State-optional form, not a Federal form).
- Submit the report to the State (or EPA Regional Office for some States and Territories).
- Maintain a copy of each form for three years.

**State agencies** must perform the following activities:

- Distribute Hazardous Waste Report forms and instructions.
- Assist respondents.
- Key entry of report submissions.
- Perform quality assurance.

**(2) Notification of Regulated Waste Activity**

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

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

Section 260.42(b) provides that, if a hazardous secondary material generator, tolling contractor, toll manufacturer, reclaimer or intermediate facility has submitted a notification, but then subsequently stops managing hazardous secondary materials in accordance with the

exclusion(s), the facility must notify the Regional Administrator within thirty (30) days using EPA Form 8700-12. For purposes of this section, a facility has stopped managing hazardous secondary materials if the facility no longer generates, manages and/or reclaims hazardous secondary materials under the exclusion(s) and does not expect to manage any amount of hazardous secondary materials for at least one year

(i) Data Items:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities, as applicable:

- Complete and submit EPA Form 8700-12 prior to operating under exclusion(s).
- Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter.

- Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion, if applicable.

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

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

(i) Data Item:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Complete and submit EPA Form 8700-12.

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

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

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

must notify that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K.

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

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

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

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

(i) Data Items:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities, as applicable:

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

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

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

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

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

(i) Data Items:

- A Site ID Form with the following fields filled out, at a minimum:
  - Reason for submittal;
  - Site EPA Identification Number (except for CESQGs);
  - Site name;
  - Site location information;
  - Site land type;

- North American Industry Classification System (NAICS) code(s) for the site;
- Site mailing address;
- Site contact person;
- Operator and legal owner of the site;
- Type of regulated waste activity; and
- Certification.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

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

(i) Data Items:

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

Or

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

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

(i) Data Items:

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

- A certification signed by the facility owner, operator, or authorized representative.

Or

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

**(3) Part A Hazardous Waste Permit Application and Modification**

**(a) Part A Permit Application**

*(a1) Contents of the Part A Permit Application*

40 CFR 270.1 requires owners or operators of newly regulated facilities subject to permitting requirements for the first time and permitted facilities with newly regulated units to prepare and submit a Part A Permit Application (EPA Form 8700-23).

(i) Data Items:

- A list of the activities conducted by the applicant that require the owner or operator to obtain a RCRA permit.
- Name, mailing address, and location, including latitude and longitude of the facility for which the application is submitted.
- Up to four NAICS codes that best reflect the principal products or services provided by the facility.
- Operator's name, address, telephone number, ownership status, and status as Federal, State, private, public or other entity.



- Name, address, and phone number of the owner of the facility.
- Whether the facility is located on Indian lands.
- An indication of whether the facility is new or existing and whether it is a first or revised application.
- For existing facilities, the following information:
  - A scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas and
  - Photographs of the facility clearly delineating all existing structures; existing treatment, storage and disposal areas; and sites of future treatment, storage, and disposal areas;
- A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items.
- A specification of the hazardous wastes listed or designated under 40 CFR Part 261 to be treated, stored, or disposed of at the facility; an estimate of the quantity of such wastes to be treated, stored, or disposed annually; and a general description of the processes to be used for such wastes.
- A listing of all permits or construction approvals received or applied for under any of the following programs:
  - Hazardous Waste Management program under RCRA
  - Underground Injection Control (UIC) Program under the Safe Drinking Water Act (SDWA)
  - National Pollutant Discharge Elimination System (NPDES) program under the Clean Water Act (CWA)
  - Prevention of Significant Deterioration (PSD) program under the Clean Air Act (CAA)
  - Nonattainment program under the CAA
  - National Emission Standards for Hazardous Air Pollutants (NESHAPS) preconstruction approval under the CAA
  - Ocean dumping permits under the Marine Protection Research and Sanctuaries Act
  - Dredge or fill permits under section 404 of the CWA
  - Other relevant environmental permits, including State permits.
- A topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the source, depicting the following aspects of the facility:
  - Each of its intake and discharge structures;
  - Each of its hazardous waste treatment, storage, or disposal facilities;
  - Each well where fluids from the facility are injected underground; and

- Wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.
- A brief description of the nature of the business.
- For hazardous debris, a description of the debris category(ies) and containment category(ies) to be treated, stored, or disposed of at the facility.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Read the regulations and instructions.
- Prepare the Site ID Form.
- Prepare the Hazardous Waste Permit Information Form and reports.

(a2) *Signatories to Permit Applications and Permit Application Reports*

40 CFR 270.11(a) requires operators of facilities to obtain the necessary signatures and certifications for the Part A Permit Application, reports, and other information requested by EPA. Additionally, operators must obtain new authorization for authorizations deemed invalid.

(i) Data Items:

- Signatures required on Part A Permit Applications:
  - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
  - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
  - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).
- Signatures for reports required by permits and other information requested by the Director:
  - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
  - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
  - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).

- Signature of a duly authorized representative of one of the persons listed above as defined at 40 CFR 270.11(b).
- New authorization satisfying the requirements of 40 CFR 270.11(b) if an authorization under 40 CFR 270.11(b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Data items for this requirement are the same as those under 40 CFR 270.11(b).
- Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Obtain signatures and certifications for the Part A Permit Application, reports, and other information requested by EPA.
- Obtain a new authorization for invalid authorizations.

(a3) *Submittal of Part A Permit Application*

40 CFR 270.70(b) requires owners and operators who submit a Part A Permit Application to EPA, to explain or cure an alleged deficiency in the Part A Permit Application, if EPA notifies the applicant that the application fails to meet the requirements of 40 CFR 270.13.

(i) Data Items:

- Part A Permit Application and reports.
- Explanation of alleged deficiency in the Part A Permit Application.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Submit the Part A Permit Application and reports.
- Explain or cure an alleged deficiency in the Part A Permit Application, if required.

**State agencies** must perform the following activities:

- Review information contained in the application.
- Ensure that the Part A Permit Application and associated reports are signed by the appropriate person.
- Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility.
- Review signature certifications.
- Enter information into the RCRAInfo database.
- Notify applicant of deficiency in the Part A Permit Application.

**(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations**

Under 40 CFR 270.72, interim status facilities must prepare and submit a revised Part A Permit Application if the Agency promulgates a rulemaking that affects the facility, or if the owner/operator otherwise modifies the facility. Interim status facilities who modify their Part A Permit Application are required to submit a revised Part A Permit Application.

(i) Data Items:

- Part A application using EPA Form 8700-23.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Read the regulations and instructions in preparation for revising a Part A Permit Application in response to an Agency rulemaking or a facility modification.

- Prepare and submit a revised Part A Permit Application in response to an Agency rulemaking or facility modification.
- Prepare and submit justifications for changes, if needed.
- Submit Subpart H compliance demonstrations, if needed.

***State agencies*** must perform the following activities:

- Review information revised Part A Permit Application.
- Enter revised Part A Permit Application information into the RCRAInfo database.
- Review justifications for changes.
- Review Subpart H compliance demonstrations.

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

### 5(a) AGENCY ACTIVITIES

#### (1) Hazardous Waste Report

As discussed in Section 4(b) of this document, the Hazardous Waste Report data collection process is delegated to the States. However, EPA is involved throughout this process. The extent of EPA's involvement depends on the activities performed by the States in the data collection process. The following paragraphs briefly describe EPA's participation in the data collection process.

In some cases, the EPA Region performs all of the State roles. That is, EPA Regions, where the Region implements the RCRA hazardous waste program for a State, provide respondents with the Federal form, collect the responses, contact non-respondents, enter the data into a database using off-the-shelf software packages which have been developed to support the collection of Hazardous Waste Report data, assure data quality, and forward the data to EPA Headquarters.

In other cases, the EPA Region provides direct processing support for some, but not all, of the collection activities. For example, the EPA Region may support the State in data gathering and data quality assessment.

In still other cases, the EPA Regions provide additional resources to the States. For example, the EPA Region may provide technical support to States for the transfer of their files to EPA for incorporation into the national database.

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

EPA activities for the Hazardous Waste Report include the following:

- ***Develop Hazardous Waste Report forms and instructions.*** Print paper and CD copies.
- ***Distribute Hazardous Waste Report forms and instructions.*** EPA Headquarters distributes the form and instruction booklets to the States and Regions. Regions prepare mailing lists, mail forms and instructions, record receipt of completed forms, and contact sites that fail to respond within the specified time period.

- ***Develop computer capabilities required to compile national data.*** EPA Headquarters develops the computer capabilities required to load data into the national database, the reports which support data quality assessment and other programmatic use of the data, and preparation of the national report.
- ***Assist respondents.*** EPA Regions and Headquarters provide assistance to respondents. States are, however, the first point of contact for answering respondent questions and assistance, where applicable.
- ***Key entry of report submissions.*** EPA Regions and the regulated entities, key enter or electronically load the data into a database they select and maintain. The data entry function was privatized for the 1999 Hazardous Waste Report process. Many States, Regions, and the regulated community use one of the private vendor's software packages for data entry and recordkeeping. Some reports are entered directly on State or vendor hosted Internet sites and some are submitted on diskettes.
- ***Perform quality assurance.*** EPA Regions and Headquarters perform data quality assurance. This includes: follow-up to non-respondents, detection and correction of unacceptable responses (e.g., in cases where the respondent misunderstood the instructions); verification of exceptional responses (e.g., data reported by a respondent that differ significantly from data reported by the rest of the respondent universe) and identification of significant response changes between reporting years. The national software supports these activities with a variety of data editing functions.

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

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

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

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

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

## (2) Notification of Regulated Waste Activity

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

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

## (3) Part A Hazardous Waste Permit Application and Modification

EPA activities associated with Part A Permit Applications include the following:

- For Part A Permit Applications:
  - Reviewing information contained in the application.
  - Ensuring that the Part A Permit Application and associated reports are signed by the appropriate person.
  - Reviewing newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility.
  - Reviewing signature certifications.
  - Entering information into the RCRAInfo database.
  - Notifying applicant of deficiency in the Part A Permit Application.
- For revised Part A Permit Applications, justifications, and compliance demonstrations:
  - Review information revised Part A Permit Application.
  - Enter revised Part A Permit Application information into the RCRAInfo database.
  - Review justifications for changes.
  - Review Subpart H compliance demonstrations.



## **5(b) COLLECTION METHODOLOGY AND MANAGEMENT**

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

## **5(c) SMALL ENTITY FLEXIBILITY**

### **(1) Hazardous Waste Report**

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

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

### **(2) Notification of Regulated Waste Activity**

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

### **(3) Part A Hazardous Waste Permit Application and Modification**

Interim status is statutorily conferred without regard to facility size. Therefore, EPA believes that requirements regarding Part A submissions and revisions must apply equally to large and small businesses. Although the legal requirements for Part A Permit Application information are the same for large and small businesses, the Agency believes that in practice the small entities will find it easier to provide the required information. In many instances, a small organization will be able to complete or revise the Part A Permit Application in less time than larger organizations because they use fewer processes for the management of hazardous wastes and they manage fewer types of wastes. As a rule of thumb, the complexity of preparing a Part A Permit Application depends upon the complexity of the processes of a hazardous waste facility and the wastes managed at the facility. Therefore, if a small organization operates a complex facility (e.g., a chemical landfill that manages a very large number of waste streams), then the time to complete the Part A Permit Application will necessarily be greater. Again, EPA has taken steps to minimize the burden on all respondents by providing detailed instructions for completion of the Part A Permit Application form and by requiring short answer responses to most of the items of the application.

It also should be noted that the reporting requirements for changes are brief. Therefore, owners or operators can easily comply with these requirements. In addition, most of the revisions to Part A Permit Applications will entail merely checking boxes or filling in numbers to indicate the type of new activity or new waste to be handled at the facility. Any written justification entails a short letter from the owner or operator. EPA, therefore, estimates that the potential burden on small businesses caused by this information collection is minimal.

**5(d) COLLECTION SCHEDULE**

**(1) Hazardous Waste Report**

EPA’s 2011 Hazardous Waste Report national implementation schedule is outlined in Table 4.

**Table 4  
2011 Hazardous Waste Report National Implementation Schedule**

<b>Activity</b>	<b>Completion Date</b>
Implementers begin loading 2011 Hazardous Waste Report data into RCRAInfo Biennial Report National Data Quality Reports & National Exhibit Reports available for use in performing additional data quality checks	April 2, 2012
DEADLINE for implementers to load complete data into RCRAInfo for EPA Headquarter’s national data quality check  Review work and publication of the Preliminary 2011 National Biennial Report	July 2, 2012
EPA Headquarters publishes Preliminary 2011 National Biennial Report (only posted in RCRAInfo)	August 6, 2012
Last day to request a State Summary Report from EPA Headquarters	October 1, 2012
DEADLINE for implementers to load FINAL data into RCRAInfo for EPA Headquarters to perform final quality assurance/quality control of final data	November 5, 2012
EPA Headquarters makes Final 2011 National Biennial Report data available on RCRAInfo Web (public Web site)	December 10, 2012

**(2) Notification of Regulated Waste Activity**

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

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

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

Under sections 262.12, 263.11, 264.11 and 265.11, all new hazardous waste generators, transporters, and TSDFs must notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Under section 270.1(b), these hazardous waste generators, transporters, and TSDFs, are also subject to newly promulgated or revised regulations at 40 CFR Part 261 (identification and listing of hazardous wastes) and must notify EPA of new or revised hazardous waste activities no later than 90 days after promulgation or revision. In addition, other generators; transporters; recyclers; and treatment, storage and disposal facilities that are subject to notification requirements under sections 266.21, 266.22, 266.23, 266.70(b)(1), 266.80(b)(1)(i), 266.80(b)(2)(i), 266.101(a), 266.101(b), 266.101(c), 266.102(a)(2)(ii), 266.103(a)(4)(ii), and 273.60(a) must notify EPA of their hazardous waste activities within the same time frame. Under section 273.54, universal waste transporters who determine that any material resulting from a release of universal waste is a hazardous waste are subject to 40 CFR Part 262. As a result, these transporters may also be subject to, under these circumstances, the section 262.12 notification requirements and procedures. As such, these transporters must, at that time, notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Finally, owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities.

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

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

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

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

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

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

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

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

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

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

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

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

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

**(3) Part A Hazardous Waste Permit Application and Modification**

**(a) Part A Permit Application**

Owners or operators of new hazardous waste management facilities that are not yet constructed are required to submit their Part A Permit Application, including signatures and certifications at least 180 days before physical construction is expected to commence. For existing facilities newly subject to RCRA permitting requirements due to promulgation of a new regulation or listing of hazardous waste, the new regulation typically specifies the date by which Part A Permit Applications, including signatures and certifications, must be submitted.

**(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations**

The time frame in which owners or operators must submit a revised Part A Permit Application varies according to the nature of changes at the facility. For the following types of changes, the owner or operator must submit revised Part A Permit Applications and justifications prior to making the changes:

- Treating, storing, or disposing of hazardous wastes not previously identified in the Part A Permit Application.
- Increasing the design capacity of processes used at the facility.
- Changing or adding processes for treating, storing, or disposing of hazardous wastes.

For changes in ownership or operational control of a facility, the new owner or operator must submit a revised Part A Permit Application no later than 90 days prior to the scheduled change. Subpart H compliance demonstrations must be submitted within six months of the date of the change in ownership or operational control of the facility.

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

### 6(a) ESTIMATING RESPONDENT BURDEN HOURS

Exhibits 1 through 3 provide estimates of the respondent hourly burden associated with the information collection requirements covered in this ICR. The exhibits include burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. The majority of the hour estimates in Exhibits 1 through 3 are based on consultations with industry and States.

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

#### (1) Hazardous Waste Report

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

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

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

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 5 below. EPA multiplied the percentage of pre-populated Site ID Forms by the average burden for updating the information contained in the form. EPA also multiplied the percentage of blank Site ID Forms by the average burden for completing the blank form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 5**  
**Assumptions and Weighted-Average Equation Used in Estimating Burden to Complete the Site Identification Form of the Hazardous Waste Report**

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

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

During consultations conducted during the development of this ICR, State and facility representatives indicated that Forms GM and WR often can be completed from databases that track manifests or other information for billing purposes. Based on these consultations, EPA estimated the hourly burden for the Forms GM and WR submitted electronically to be significantly less than for forms submitted on paper.

To estimate the percentage of facilities that submit Forms GM and WR electronically, EPA used information gained from consultations and 2009 Hazardous Waste Report data. For Form GM submissions, EPA estimated that, based on consultations and best professional judgment, facilities submitting five (5) or more Forms GM for the Hazardous Waste Report are likely to do so electronically. Using 2009 Hazardous Waste Report data<sup>5</sup>, EPA identified sites submitting Forms GM, counted their Forms GM submitted, and calculated the percentage that their Forms GM represented of the total number of Forms GM. Based on this methodology, EPA estimates that 92 percent of Forms GM are submitted electronically, while the remaining 8 percent are sent manually.

For Forms WR, EPA believes that TSDFs receiving large numbers of off-site shipments are more likely to have systems in place to track waste stream data, and as a consequence, to submit Hazardous Waste Report data electronically. Using 2009 Hazardous Waste Report data<sup>6</sup>, EPA reviewed the list of Forms WR reported to the Hazardous Waste Report by facility and, based on its own professional judgment and consultations, estimates that 100 percent of Forms WR are submitted electronically.

To estimate the average burden per respondent in preparing a Form GM or WR, EPA used the weighted-average calculations in Table 6. EPA multiplied the percentage of both forms submitted electronically by their respective burden for electronic reporting and the percentage of both forms submitted manually by their respective burden for manual reporting. Then, EPA added the two products for each form, respectively, to calculate an overall weighted-average burden for both forms.

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<sup>5</sup> 2009 Hazardous Waste Report (i.e., 2009 Biennial Report) data used in this analysis are current as of April 12-29, 2011.

<sup>6</sup> 2009 Hazardous Waste Report (i.e., 2009 Biennial Report) data used in this analysis are current as of April 12-29, 2011.

**Table 6**  
**Assumptions and Weighted-Average Equations Used in Estimating Burden to Complete Form GM and Form WR of the Hazardous Waste Report**

Activity	Assumptions	Weighted-Average Equation
Complete Form GM	0.28 hour to complete electronically; 92 percent of the forms are completed electronically  1.20 hours to complete manually; 8 percent of the forms are completed manually	$(0.28 \text{ hr} \times 0.92) + (1.20 \text{ hrs} \times 0.08)$ = 0.36 hour
Complete Form WR	0.12 hour to complete electronically; 100% of the forms are completed electronically	$0.12 \text{ hr} \times 1$ = 0.12 hour

**(2) Notification of Regulated Waste Activity**

During consultations conducted during the development of previous versions of this ICR, EPA contacted industry representatives to ascertain their burden for completing the Site ID Form for initial and subsequent notifications. All of them indicated that they complete a blank Site ID Form for each notification and their burdens ranged from 5 minutes to 3 hours per submittal.

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

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

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

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



complying with these notification requirements.

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

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

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 7 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 7**  
**Assumptions and Weighted-Average Equation**  
**Used in Estimating Burden to Complete the Notification of**  
**Hazardous Secondary Material Activity under 40 CFR 260.42**

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

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

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

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

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 8 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 8  
Assumptions and Weighted-Average Equation  
Used in Estimating Burden to Complete the Notification of  
Hazardous Waste Activity under 40 CFR Part 262, Subpart K**

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

**(c) Other Notifications Covered in this ICR**

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

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

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 9 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 9**  
**Assumptions and Weighted-Average Equation Used in**  
**Estimating Burden to Complete Other Notifications Covered in this ICR**

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

**(3) Part A Hazardous Waste Permit Application and Modification**

In estimating the hourly burden for preparing the Site ID Form of the Part A Permit Application, EPA assumes that all of the facilities submitting a Part A Permit Application or Modification during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form and the remaining 50 percent will use their most recently submitted Site ID Form.

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

The above burden estimates are reflected in Exhibit 3 as weighted-averages. EPA derived the weighted averages using the calculations in Table 10 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 10**  
**Assumptions and Weighted-Average Equation Used in Estimating**  
**Burden to Complete the Site Identification Form of the Part A Permit Application**

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

**6(b) ESTIMATING RESPONDENT COSTS**

Exhibits 1 through 3 provide estimates of the annual respondent costs associated with the information collection requirements covered in this ICR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M).

**(1) Labor Costs**

Using the total burden hours discussed in Section 6(a) and the hourly labor costs outlined in this section, Exhibits 1 through 3 illustrate the labor costs associated with the information collection requirements covered in this ICR.

**(a) Private Sector Facilities**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$122.72 for legal staff, \$72.54 for managerial staff, \$54.04 for technical staff, and \$32.51 for clerical staff. These respondent labor costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.14, dated September 10, 2009), and updated to 2011 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.<sup>7</sup>

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<sup>7</sup> Bureau of Labor Statistics, "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry," *Employment Cost Index - Historical Listing*, March 2011. Available online at: <http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on May 16, 2011. Civilian Workers, All Workers, June 2009=110.2 and March 2011=114.0.

## **(b) State and Local Government Facilities and Agencies**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$57.54 for legal staff, \$54.02 for managerial staff, \$32.32 for technical staff, and \$20.62 for clerical staff. These respondent labor costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.14, dated September 10, 2009), and updated to 2011 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.<sup>8</sup>

### **(2) Capital Costs**

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

### **(3) Operation and Maintenance Costs**

O&M costs are those costs associated with an information collection requirement incurred continually over the life of the ICR. For this ICR, O&M costs include mailing costs:

- EPA estimates that facilities submitting a Hazardous Waste Report or a Part A Permit Application to EPA or States will incur a cost of \$5.82 to mail an 11-ounce large envelope by certified mail (\$2.88 for postage, \$2.85 for the certified-mail fee, and \$0.09 for a catalog envelope).<sup>9, 10, 11</sup>
- EPA estimates that facilities submitting a notification to EPA will incur a cost of \$3.31 to mail a one-ounce letter by certified mail (i.e., \$0.44 for first-class letter postage, \$2.85 for the certified-mail fee, and \$0.02 for standard business envelope).<sup>12, 13, 14</sup>

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<sup>8</sup> Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," *Employment Cost Index - Historical Listing*, March 2011. Available online at: <http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on May 16, 2011. State and Local Government Workers, All Workers, June 2009=112.8 and March 2011=116.6.

<sup>9</sup> U.S. Postal Service; "First-Class Mail Prices." Available online at: <http://www.usps.com/prices/first-class-mail-prices.htm>, last accessed on July 7, 2011.

<sup>10</sup> U.S. Postal Service; "Extra Services Prices." Available online at: <http://www.usps.com/prices/extra-services-prices.htm>, last accessed on July 7, 2011.

<sup>11</sup> Catalog envelope cost based on current market price, as of July 7, 2011 (i.e., box of 100 catalog envelopes with gummed closure at \$8.79).

<sup>12</sup> U.S. Postal Service; "First-Class Mail Prices." Available online at: <http://www.usps.com/prices/first-class-mail-prices.htm>, last accessed on July 7, 2011.

<sup>13</sup> U.S. Postal Service; "Extra Services Prices." Available online at: <http://www.usps.com/prices/extra-services-prices.htm>, last accessed on July 7, 2011.

<sup>14</sup> Standard business envelope cost based on current market price, as of July 7, 2011 (i.e., box of 500 standard business envelopes with gummed closure at \$8.99).

- EPA estimates that State agencies distributing the Hazardous Waste Report to facilities will incur a cost of \$2.97 to mail an 11-ounce large envelope (\$2.88 for postage and \$0.09 for a catalog envelope).<sup>15, 16</sup>

The above O&M costs are shown in Exhibits 1 through 3 for all applicable respondent activities.

### **6(c) ESTIMATING AGENCY HOUR AND COST BURDEN**

EPA estimates the Agency hour and cost burden associated with the information collection requirements covered in this ICR in Exhibits 4 through 6. As shown in the exhibits, EPA estimates an average hourly labor cost of \$86.56 for legal staff (GS15, Step 5), \$76.38 for managerial staff (GS-15, Step 1), \$54.94 for technical staff (GS-13, Step 1), and \$23.44 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2011. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

EPA does not anticipate that the Agency will incur capital costs in carrying out the information collection requirements covered in this ICR.

O&M costs are associated with Hazardous Waste Report activities. In particular, EPA estimates that the Agency will incur a cost of \$20,920 in printing paper and CD copies of the Hazardous Waste Report forms and instructions, \$261,500 in developing computer capabilities required to compile national data, \$52,300 in preparing the National Report, and \$36,610 in storing the national data. These O&M costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.14, dated September 10, 2009), and updated to 2011 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.<sup>17</sup> EPA O&M costs are shown in Exhibit 4 for all applicable activities.

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

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

EPA notes that, as used in this document, the term “respondent” includes:

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<sup>15</sup> U.S. Postal Service; “First-Class Mail Prices.” Available online at: <http://www.usps.com/prices/first-class-mail-prices.htm>, last accessed on July 7, 2011.

<sup>16</sup> Catalog envelope cost based on current market price, as of July 7, 2011 (i.e., box of 100 catalog envelopes with gummed closure at \$8.79).

<sup>17</sup> Bureau of Labor Statistics, Table Containing History of CPI-U U.S. All Items Indexes and Annual Percent Changes From 1913 to Present, June 15, 2011. Available online at: <ftp://ftp.bls.gov/pub/special.requests/cpi/cpi.txt>, last accessed on July 7, 2011. All items, September 2009=215.969 and May 2011=225.964.

- Hazardous waste facilities complying with the Hazardous Waste Report, notification, and Part A Permit Application requirements covered in this ICR. This includes:
  - Private sector entities; and
  - State and local government agencies that are regulated entities<sup>18</sup>.
- State agencies administering the RCRA hazardous waste program<sup>19</sup>.

**(1) Respondent Universe**

**(a) Hazardous Waste Report**

Based on 2009 Hazardous Waste Report data<sup>20</sup>, EPA estimates that the total number of respondents to the 2011 Hazardous Waste Report will be 21,066, which annualized over the two-year report cycle equals 10,533 per year (i.e., 21,066/2). Table 11 presents information on the total number of forms associated with the 2011 Hazardous Waste Report. In estimating annual respondent burden and cost, EPA annualized these numbers over the two-year report cycle.

**Table 11  
Total Number of 2011 Hazardous Waste Report Forms**

Hazardous Waste Report Form	Number of Forms <sup>a</sup>		
	Private Sector	State and Local Government	Total
Site Identification (Site ID) Form	18,976	2,090	21,066
Form GM - Generation and Management	189,528	16,504	206,032
Form WR - Waste Received from Offsite	1,018,988	18,011	1,036,999
<b>Total</b>	<b>1,227,492</b>	<b>36,605</b>	<b>1,264,097</b>

<sup>a</sup> Based on 2009 Hazardous Waste Report (i.e., 2009 Biennial Report) data current as of April 12-29, 2011.

The number of respondents and forms for each respondent activity is presented in Exhibit 1. These estimates assume that all forms are submitted in accordance with the Hazardous Waste Report instructions. Exhibit 1 also estimates the annual respondent burden and cost for the activities examined.

**(b) Notification of Regulated Waste Activity**

<sup>18</sup> Addressing State and local government agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the Paperwork Reduction Act (PRA).

<sup>19</sup> Ibid.

<sup>20</sup> 2009 Hazardous Waste Report (i.e., 2009 Biennial Report) data used in this analysis are current as of April 12-29, 2011.

In estimating the number of respondents subject to the notification requirements covered in this ICR, EPA referred to RCRAInfo. EPA estimated the annual number of notifications tracked by RCRAInfo. EPA then averaged the number of notifications submitted in 2009 and 2010. These estimates are presented in Table 12 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 2 of this ICR.

**(c) Part A Hazardous Waste Permit Application and Modification**

In estimating the number of respondents subject to the Part A Permit Application requirements covered in this ICR, EPA referred to the RCRAInfo system. EPA estimated the annual number of Part A Permit Applications tracked by RCRAInfo. EPA then averaged the number of applications submitted in 2009 and 2010. These estimates are presented in Table 13 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 3 of this ICR.



**Table 12**  
**Annual Number of Respondents Subject to the Notification Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2009			Year 2010			Average of Years 2009 and 2010		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>									
Number of facilities submitting notification prior to operating under exclusion	23	0	23	23	2	25	23	1	24
Number of small quantity generators (SQGs) and conditionally-exempt small quantity generators (CESQGs) submitting notification by March 1 of each even numbered year thereafter	0	0	0	7	0	7	4	0	4
Number of facilities submitting notification indicating that they will no longer manage hazardous secondary materials in accordance with the exclusion	0	0	0	3	0	3	2	0	2
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>									
Number of facilities submitting initial notification	7,760	1,695	9,455	8,158	1,313	9,471	7,959	1,504	9,463
Number of facilities submitting subsequent notification	34,641	2,288	36,929	33,295	1,889	35,184	33,968	2,089	36,057
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>									
Number of eligible academic entities submitting notification of intent to comply with Subpart K and recordkeeping of agreements	Not Available	Not Available	Not Available	6	2	8	6	2	8
Number of teaching hospitals not owned by a college or university opting into Subpart K	Not Available	Not Available	Not Available	0	0	0	0	0	0
Number of non-profit research institutes not owned by a college or university opting into Subpart K	Not Available	Not Available	Not Available	1	0	1	1	0	1
Number of eligible academic entities submitting notification of withdrawal from 40 CFR Part 262, Subpart K	Not Available	Not Available	Not Available	0	0	0	0	0	0

**Table 12 (continued)**  
**Annual Number of Respondents Subject to the Notification Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2009			Year 2010			Average of Years 2009 and 2010		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>									
Number of facilities submitting initial notification	54	20	74	68	17	85	61	19	80
Number of facilities submitting subsequent notification	80	3	83	60	5	65	70	4	74
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>									
Number of facilities submitting initial notification	99	1	100	122	4	126	111	3	114
Number of facilities submitting subsequent notification	180	5	185	217	12	229	199	9	208

<sup>a</sup> Based on data from two RCRAInfo tables: (1) "Hhandler," (2) "Howner\_operator," (3) "Huniversal\_waste," and (4) "Hhsm\_basic." All tables contain data current as of April 27, 2011.

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

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

**Table 13**  
**Annual Number of Respondents Subject to the Part A Permit Application Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2009			Year 2010			Average of Years 2009 and 2010		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
Number of facilities submitting initial Part A Permit Application	4	0	4	2	1	3	3	1	4
Number of facilities submitting Part A Permit Modification	21	1	22	19	2	21	20	2	22

<sup>a</sup> Based on data from two RCRAInfo tables: (1) "Hhandler" and (2) "Howner\_operator." Both tables contain data current as of April 27, 2011.

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

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

**(2) Annual Respondent Burden****(a) Hazardous Waste Report - Facilities (Exhibits 1A and 1B)***(a1) Read the Hazardous Waste Report Instructions*

EPA estimates that all 21,066 respondents will read the Hazardous Waste Report instructions. Annualized over the two-year report cycle, this results in 10,533 respondents reading the instructions each year (i.e., 9,488 private sector facilities and 1,045 State and local government facilities).

*(a2) Revise In-House or Commercial Data System*

EPA estimates that all 7,858 electronic reporters will revise their in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations. Annualized over the two-year report cycle, this results in 3,929 respondents revising their in-house or commercial data systems each year (i.e., 3,707 private sector facilities and 222 State and local government facilities).

*(a3) Gather Information and Complete Site Identification Form*

EPA estimates that all 21,066 respondents will complete and submit a Site ID Form with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 10,533 respondents preparing and submitting a Site ID Form each year (i.e., 9,488 private sector facilities and 1,045 State and local government facilities).

*(a4) Gather Information and Complete Form GM*

EPA estimates that respondents will submit a total of 206,032 Forms GM with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 103,016 Forms GM each year (i.e., 94,764 forms from private sector facilities and 8,252 forms from State and local government facilities).

*(a5) Gather Information and Complete Form WR*

EPA estimates that respondents will submit a total of 1,036,999 Forms WR with the 2009 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 518,500 Forms WR each year (i.e., 509,494 forms from private sector facilities and 9,006 forms from State and local government facilities).

Note that the number of Forms WR represents the number of blocks on Form WR that have been completed; the paper form actually contains three blocks of the same WR information (i.e., the same questions, repeated three times on the same page).

*(a6) Gather Information and Complete Form OI*

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

*(a7) Submit the Biennial Report to State/Region*

EPA expects each respondent, 10,533 facilities per year (i.e., 9,488 private sector facilities and 1,045 State and local government facilities), to submit the report to the appropriate State or Region.

*(a8) Maintain a Copy of Each Form*

EPA expects facilities to retain an estimated 632,049 (i.e., 10,533 Site ID Forms + 103,016 Forms GM + 518,500 Forms WR) forms each year (i.e., 613,746 forms from private sector facilities and 18,303 forms from State and local government facilities).

**(b) Hazardous Waste Report – State Agencies (Exhibit 1C)**

*(b1) Distribute Hazardous Waste Report Forms and Instructions*

EPA estimates that State agencies will distribute Hazardous Waste Report forms and instructions to 20,887 respondents. Annualized over the two-year report cycle, this results in 10,444 respondents each year.

*(b2) Assist Respondents*

EPA expects State agencies to provide assistance to all 20,887 respondents. Annualized over the two-year report cycle, this results in 10,444 respondents each year.

*(b3) Key Entry of Report Submissions*

EPA estimates that State agencies will need to key enter data for 24,480 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) completed manually by the facilities. Annualized over the two-year report cycle, this results in 12,240 respondents each year.

*(b4) Perform Quality Assurance*

EPA expects State agencies to perform data quality assurance on all 1,261,900 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) submitted by facilities. Annualized over the two-year report cycle, this results in 630,950 respondents each year.

**(c) Notification of Regulated Waste Activity (Exhibits 2A and 2B)**

*(c1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42*

EPA estimates that, each year, 24 entities (i.e., 23 private sector facilities and 1 State and local government facility) will notify EPA under section 260.42 prior to operating under the exclusion and be required to complete the information laid out at section 260.42(a).

In addition, entities must re-notify EPA using the Site ID Form by March 1 of each even numbered year thereafter. Note that the Hazardous Waste Report regulations already require the submittal of the Site ID Form by March 1 of each even numbered year by LQGs (40 CFR Part 262) and TSDFs (40 CFR Part 264 and 265). Hence, this section of the ICR estimates burden for SQG and CESQG re-notifications only. For purposes of this ICR, EPA estimates that, each year, a total of four SQGs and CESQGs will re-notify EPA (i.e., 4 private sector facilities and 0 State and local government facilities).

EPA estimates that, each year, two entities will re-notify because they stopped operating under the exclusion (i.e., 2 private sector facilities and 0 State and local government facilities).

*(c2) Notification of Hazardous Waste Activity under RCRA Section 3010*

EPA estimates that, each year, 9,463 facilities (i.e., 7,959 private sector facilities and 1,504 State and local government facilities) will submit an initial notification of hazardous waste activity under RCRA Section 3010. EPA also estimates that, each year, 36,057 facilities (i.e., 33,968 private sector facilities and 2,089 State and local government facilities) will submit a subsequent notification associated with these requirements.

*(c3) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K*

Intent to Comply with Subpart K and Recordkeeping of Agreements

An eligible academic entity must submit the Site ID Form to notify EPA or the authorized State that it is electing to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all laboratories that are owned or operated by the eligible academic entity that are on-site. EPA estimates that, each year, eight forms will be completed, submitted, and retained (i.e., 6 forms from private sector entities and 2 forms from State and local government entities).

Teaching hospitals opting into Subpart K must keep a copy of their formal written affiliation agreement with a college or university on file if they are not owned by a college or university. EPA does not expect any eligible teaching hospital to opt into Subpart K during the two-year period covered by this ICR.

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

#### Withdrawal from 40 CFR Part 262, Subpart K

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

#### *(c4) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C*

EPA estimates that, each year, 80 facilities (i.e., 61 private sector facilities and 19 State and local government facilities) will submit an initial notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $80 \times 0.75 = 60$ ) will use the Site ID Form and 25 percent (i.e.,  $80 \times 0.25 = 20$ ) will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, 74 facilities (i.e., 70 private sector facilities and 4 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $74 \times 0.75 = 56$ ) will use the Site ID Form and 25 percent (i.e.,  $74 \times 0.25 = 18$ ) will prepare and submit a letter requesting an EPA Identification Number.

#### *(c5) Notification of Used Oil Activity under 40 CFR Part 279*

EPA estimates that, each year, 114 facilities (i.e., 111 private sector facilities and 3 State and local government facilities) will submit an initial notification of used oil activity under 40 CFR Part 279. Of these facilities, 75 percent (i.e.,  $114 \times 0.75 = 85$ ) will use the Site ID Form and 25 percent (i.e.,  $114 \times 0.25 = 29$ ) will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, 208 facilities (i.e., 199 private sector facilities and 9 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $208 \times 0.75 = 156$ ) will use the Site ID Form and 25 percent (i.e.,  $208 \times 0.25 = 52$ ) will prepare and submit a letter requesting an EPA Identification Number.

#### **(d) Part A Hazardous Waste Permit Application and Modification - Facilities (Exhibits 3A and 3B)**

##### *(d1) Part A Permit Application*

EPA estimates that, each year, four facilities (i.e., 3 private sector facilities and 1 State and local government facility) will submit a new Part A Permit Application. All facilities will need to obtain signatures for the Part A Permit Application, Part A Permit Application reports,

and other information requested by the Director. In addition, all facilities will need to obtain certifications from persons signing permit documentation.

EPA also estimates that, each year, 10 percent of the facilities submitting Part A Permit Applications will have authorizations that are no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Therefore, each year, one (1) facility will need to obtain a new authorization.

*(d2) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations*

EPA estimates that, each year, 22 facilities (i.e., 20 private sector facilities and 2 State and local government facilities) will need to revise their Part A Permit Application. Of these, EPA expects that approximately one-third (7 facilities) will submit a revised Part A Permit Application in response to an EPA rulemaking, and two-thirds (15 facilities) will submit a revised Part A Permit Application for a facility modification.

EPA further estimates that, each year, one-third of facilities submitting revised Part A Permit Applications (7 facilities) will need to submit justifications due to either changes in the design capacity of processes used at the facility and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. In addition, EPA estimates that, each year, one-third of facilities submitting revised Part A Permit Applications (7 facilities) will need to submit a Subpart H compliance demonstration due to changes in ownership or operational control of a facility.

**(e) Part A Hazardous Waste Permit Application and Modification – State Agencies (Exhibit 3C)**

*(e1) Part A Permit Application*

EPA estimates that, each year, State agencies will receive four Part A Permit Applications. State agencies will need to review the applications, review the signatories to the permit applications and reports, and enter the Part A Permit Application information into the RCRAInfo database.

EPA also estimates that, each year, 10 percent of the Part A Permit Applications will have authorizations that are no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Therefore, each year, State agencies will need to notify one (1) applicant of a deficiency in the Part A Application and review the newly authorized signature.



*(e2) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations*

EPA estimates that, each year, State agencies will receive 22 revised Part A Permit Applications. State agencies will need to review the applications and enter the Part A Permit Application information into the RCRAInfo database.

EPA further estimates that, each year, one-third of the revised Part A Permit Applications (7 applications) will be accompanied by justifications due to either changes in the design capacity of processes used at the facility and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. In addition, EPA estimates that, each year, one-third of the revised Part A Permit Applications (7 applications) will be accompanied by a Subpart H compliance demonstration due to changes in ownership or operational control of a facility. State agencies will need to review all justifications and Subpart H compliance demonstrations.

**6(e) BOTTOM LINE HOUR AND COST BURDEN**

**(1) Respondent Tally**

Exhibit 7 summarizes the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual respondent burden to be 440,243 hours and \$18,267,341. The bottom line burden to respondents over two years is estimated to be 880,486 hours and \$36,534,682.

**(2) Agency Tally**

Exhibit 8 summarizes the total annual EPA hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual EPA burden to be 120,882 hours and \$6,306,439. The bottom line burden to EPA over two years is estimated to be 241,764 hours and \$12,612,878.

**6(f) REASONS FOR CHANGE IN BURDEN**

Following is a discussion of reasons for change in burden. Note that this ICR burden changed solely because of adjustments. There were no program changes.

**(1) Hazardous Waste Report**

**(a) Facility Burden**

For facilities, the annual burden estimate for the 2009 Hazardous Waste Report (EPA ICR Number 0976.14) was 169,780 hours. The annual burden estimate for the 2011 Hazardous Waste Report is 171,280 hours. This represents an increase of 1,500 hours.

This increase in burden has occurred for three primary reasons. First, there was an increase in the annualized number of respondents, from 8,242 projected for 2009 to 10,533 projected for 2011. Second, there was an increase in the number of Hazardous Waste Report forms projected for 2009 versus the number of forms projected for 2011. Table 14 compares the projected number of forms for the 2009 and the 2011 Hazardous Waste Reports.

Third, in developing this ICR, EPA carefully reviewed the respondent activities associated with the Hazardous Waste Report requirements. Based on consultations with industry and States, EPA increased some of the hourly and cost burden estimates associated with the Hazardous Waste Report. EPA believes that the revised burden estimates included in this ICR reflect a realistic industry average.

**Table 14**  
**Comparison of Projected Number of Forms**  
**for the 2009 and 2011 Hazardous Waste Report**

Hazardous Waste Report Form	Projected Number of Forms		Difference
	2009 Hazardous Waste Report	2011 Hazardous Waste Report	
Site Identification (Site ID) Form	16,483	21,066	4,583
Form GM - Generation and Management	205,994	206,032	38
Form WR - Waste Received from Offsite	861,640	1,036,999	175,359
<b>Total</b>	<b>1,084,117</b>	<b>1,264,097</b>	<b>179,980</b>

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the 2009 Hazardous Waste Report (EPA ICR Number 0976.14) was 215,828 hours. The annual burden estimate for the 2011 Hazardous Waste Report is 234,647 hours. This represents an increase of 18,819 hours.

This increase in burden has occurred because EPA projects an increase in the number of respondents and Hazardous Waste Report forms from 2009 to 2011. Refer to Table 14 for a comparison of the projected number of forms for the 2009 and the 2011 Hazardous Waste Reports.

**(2) Notification of Regulated Waste Activity**

For facilities, the annual burden estimate in the previously approved ICR (EPA ICR Number 0976.14) was 36,525 hours. The annual burden estimate for the same notification requirements covered in this current ICR is 33,826 hours. This represents a decrease of 2,699 hours.

This decrease in burden has occurred primarily because there was a decrease in the total number of notifications covered in the ICR. As shown in Table 15, the total number of notifications decreased from 48,255 in the previously approved ICR (EPA ICR Number 0976.14) to 46,035 in this ICR (EPA ICR Number 0976.15). Note that, in estimating the number of notifications in this ICR, EPA used the average of the number of notifications submitted in 2009 and 2010 (see Table 12). In each of these years, there was a decrease in the total annual number of notifications submitted to EPA, when compared to the annual number of notifications in the previously approved ICR. Thus, EPA believes that the number of notifications included in this current ICR is consistent with the respondent universe subject to these notification requirements.

**Table 15**  
**Comparison of Projected Number of Notifications in the**  
**Previously Approved ICR (EPA ICR Number 0976.14) and**  
**this ICR (EPA ICR Number 0976.15).**

Type of Notification	Projected Number of Notifications		Difference <sup>a</sup>
	EPA ICR Number 0976.14	EPA ICR Number 0976.15	
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42	2,029	30	-1,999
Notification of Hazardous Waste Activity under RCRA Section 3010	45,899	45,520	-379
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K	40	9	-31
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C	44	154	110
Notification of Used Oil Activity under 40 CFR Part 279	243	322	79
<b>Total</b>	<b>48,255</b>	<b>46,035</b>	<b>-2,220</b>

<sup>a</sup> Negative value indicates a decrease in the number of forms.

### **(3) Part A Hazardous Waste Permit Application and Modification**

#### **(a) Facility Burden**

For facilities, the annual burden estimate in the previously approved Part A Permit Application ICR (EPA ICR Number 0262.12) was 402 hours. The annual respondent burden estimate for the same permit application requirements covered in this ICR is 389 hours. This represents a decrease of 13 hours.

The decrease in hourly burden occurred primarily because there was a decrease in the number of new Part A Permit Applications. The number of new Part A Permit Applications decreased from eight in the previously approved ICR to four in this ICR. Note that, in estimating the number of new Part A Permit Applications in this ICR, EPA used the average of the number of new Part A Permit Applications submitted in 2009 and 2010 (see Table 13). In each of these

years, there was a decrease in the annual number of new Part A Permit Applications submitted to EPA, when compared to the annual number of new Part A Permit Applications in the previously approved ICR. Thus, EPA believes that the number of new Part A Permit Applications included in this ICR is consistent with the respondent universe subject to these permitting requirements.

**(b) State Agency Burden**

For State agencies, the annual burden estimate in the previously approved Part A Permit Application ICR (EPA ICR Number 0262.12) was 95 hours. The annual respondent burden estimate for the same permit application requirements covered in this ICR is 101 hours. This represents an increase of 6 hours.

The increase in hourly burden occurred primarily because there was an increase in the number of revised Part A Permit Applications and associated justifications and Subpart H compliance demonstrations. The number of revised Part A Permit Applications increased from 15 in the previously approved ICR to 22 in this ICR. Note that, in estimating the number of revised Part A Permit Applications in this ICR, EPA used the average of the number of Part A Permit Applications submitted in 2009 and 2010 (see Table 13). In each of these years, there was an increase in the annual number of revised Part A Permit Applications submitted to EPA, when compared to the annual number of revised Part A Permit Applications in the previously approved ICR. Thus, EPA believes that the number of revised Part A Permit Applications included in this ICR is consistent with the respondent universe subject to these permitting requirements.

**6(g) PUBLIC BURDEN STATEMENT**

**(1) Hazardous Waste Report**

The reporting burden is estimated to be 12 hours for a facility to gather data, complete and review the forms, and submit the Hazardous Waste Report. The recordkeeping burden is estimated to be 5 hours to read the instructions, and file and store the Hazardous Waste Report submission for three years.

The reporting burden is estimated to be 22 hours per facility for a State agency to distribute Hazardous Waste Report forms and instructions, assist respondents, key entry report submissions, and perform quality assurance. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

**(2) Notification of Regulated Waste Activity****(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42**

The reporting burden associated with hazardous secondary material notification requirements is estimated to be 1 hour for a facility to notify EPA under section 260.42. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

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

The reporting burden associated with RCRA Section 3010 notification requirements (initial and subsequent) is estimated to be 45 minutes for a facility to complete and submit the form. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

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

The reporting burden associated with notification requirements under 40 CFR Part 262, Subpart K is estimated to be 40 minutes for a facility to prepare and submit a Site ID Form to opt into or withdraw from Subpart K. The recordkeeping burden is estimated to be 5 minutes to keep copies of notification and affiliation agreements on-site.

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

The reporting burden associated with 40 CFR Part 273, Subpart C notification requirements (initial and subsequent) is estimated to be 45 minutes for a facility to complete the Site ID Form or prepare a letter requesting an EPA Identification Number, and submit the completed Site ID Form or letter. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

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

The reporting burden associated with 40 CFR Part 279 notification requirements (initial and subsequent) is estimated to be 45 minutes for a facility to complete the Site ID Form or prepare a letter requesting an EPA Identification Number, and submit the completed Site ID Form or letter. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

### **(3) Part A Hazardous Waste Permit Application and Modification**

#### **(a) Part A Permit Application**

The reporting burden associated with the Part A Permit Application requirements is estimated to be 20 hours for a facility to prepare and submit a Part A Permit Application. The recordkeeping burden is estimated to be 6 hours to read the regulations.

The reporting burden associated with the Part A Permit Application requirements is estimated to be 10 minutes for a State agency to notify an applicant of a deficiency in the Part A Permit Application. The recordkeeping burden is estimated to be 5 hours to review an application and signatories to the permit applications and reports, and enter the Part A Permit Application information into the RCRAInfo database.

#### **(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations**

The reporting burden associated with revising a Part A Permit Applications is estimated to be 10 hours for facilities to prepare and submit a revised Part A Permit Application, prepare and submit justifications for changes, and prepare and submit Subpart H compliance demonstrations. The recordkeeping burden is estimated to be 3 hours to read the regulations.

The recordkeeping burden associated with revising a Part A Permit Applications is estimated to be 4 hours for State agencies to review a Part A Permit Application, justification, and Subpart H compliance demonstration, and enter the Part A Permit Application information into the RCRAInfo database. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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-2011-0280, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center

(EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at [www.regulations.gov](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-2011-0280 and OMB Control Number 2050-0024 in any correspondence.

**EXHIBIT 1A**  
**2011 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$122.72/ Year	Mgr. \$72.54/ Year	Tech. \$54.04/ Year	Cler. \$32.51/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>Hazardous Waste Report</b>											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$169.13	\$0.00	\$0.00	9,488	26,186.88	\$1,604,705.44
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$60.15	\$0.00	\$0.00	3,707	3,707.00	\$222,976.05
Gather information and prepare Site Identification Form	0.00	0.08	0.40	0.08	0.56	\$30.02	\$0.00	\$0.00	9,488	5,313.28	\$284,829.76
Gather information and prepare Form GM	0.00	0.14	0.18	0.04	0.36	\$21.18	\$0.00	\$0.00	94,764	34,115.04	\$2,007,101.52
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$7.35	\$0.00	\$0.00	509,494	61,139.28	\$3,744,780.90
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$83.28	\$0.00	\$5.82	9,488	12,713.92	\$845,380.80
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$1.19	\$0.00	\$0.00	613,746	18,412.38	\$730,357.74
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>161,587.78</b>	<b>\$9,440,132.21</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 1B**  
**2011 HAZARDOUS WASTE REPORT**  
**ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES <sup>a</sup>**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$57.54/ Year	Mgr. \$54.02/ Year	Tech. \$32.32/ Year	Cler. \$20.62/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>Hazardous Waste Report</b>											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$112.64	\$0.00	\$0.00	1,045	2,884.20	\$117,708.80
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$39.48	\$0.00	\$0.00	222	222.00	\$8,764.56
Gather information and prepare Site Identification Form	0.00	0.08	0.40	0.08	0.56	\$18.90	\$0.00	\$0.00	1,045	585.20	\$19,750.50
Gather information and prepare Form GM	0.00	0.14	0.18	0.04	0.36	\$14.21	\$0.00	\$0.00	8,252	2,970.72	\$117,260.92
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$5.16	\$0.00	\$0.00	9,006	1,080.72	\$46,470.96
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$58.76	\$0.00	\$5.82	1,045	1,400.30	\$67,486.10
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$0.74	\$0.00	\$0.00	18,303	549.09	\$13,544.22
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>9,692.23</b>	<b>\$390,986.06</b>

<sup>a</sup> Exhibit includes rounding.



EXHIBIT 1C  
 2011 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$57.54/ Year	Mgr. \$54.02/ Year	Tech. \$32.32/ Year	Cler. \$20.62/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Hazardous Waste Report</b>											
Distribute Hazardous Waste Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$18.93	\$0.00	\$2.97	10,444	7,937.44	\$228,723.60
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$27.01	\$0.00	\$0.00	10,444	10,548.44	\$282,092.44
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$8.28	\$0.00	\$0.00	12,240	4,161.60	\$101,347.20
Perform quality assurance	0.00	0.02	0.16	0.16	0.34	\$9.33	\$0.00	\$0.00	630,950	211,999.20	\$5,886,763.50
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>234,646.68</b>	<b>\$6,498,926.74</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 2A  
NOTIFICATION OF REGULATED WASTE ACTIVITY  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES \***

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$122.72/ Year	Mgr. \$72.54/ Year	Tech. \$54.04/ Year	Cler. \$32.51/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.08	1.01	0.08	1.17	\$62.71	\$0.00	\$3.31	23	26.80	\$1,518.46
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.08	1.01	0.08	1.17	\$62.71	\$0.00	\$3.31	4	4.66	\$264.08
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	2	1.33	\$78.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	32.79	\$1,860.54
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$53.80	\$0.00	\$3.31	7,959	7,959.00	\$454,538.49
<b>Subsequent Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	33,968	22,588.72	\$1,324,752.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	30,547.72	\$1,779,290.49
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	6	3.99	\$234.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$2.60	\$0.00	\$0.00	6	0.48	\$15.60
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.60	\$0.00	\$0.00	0	0.00	\$0.00
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.60	\$0.00	\$0.00	1	0.08	\$2.60
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	0	0.00	\$0.00
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$2.60	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	4.55	\$252.20
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$53.80	\$0.00	\$3.31	46	46.00	\$2,627.06
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$26.78	\$0.00	\$3.31	15	7.50	\$451.35
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	53	35.25	\$2,067.00
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$26.78	\$0.00	\$3.31	17	8.50	\$511.53
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	97.25	\$5,656.94
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$53.80	\$0.00	\$3.31	83	83.00	\$4,740.13
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$26.78	\$0.00	\$3.31	28	14.00	\$842.52
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$3.31	149	99.09	\$5,811.00
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$26.78	\$0.00	\$3.31	50	25.00	\$1,504.50
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	221.09	\$12,898.15
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>30,903.40</b>	<b>\$1,799,958.32</b>

\* Exhibit includes rounding.

**EXHIBIT 2B  
NOTIFICATION OF REGULATED WASTE ACTIVITY  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES <sup>a</sup>**

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$57.54/ Year	Mgr. \$54.02/ Year	Tech. \$32.32/ Year	Cler. \$20.62/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.08	1.01	0.08	1.17	\$38.45	\$0.00	\$3.31	1	1.17	\$41.76
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.08	1.01	0.08	1.17	\$38.45	\$0.00	\$3.31	0	0.00	\$0.00
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1.17	\$41.76
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$33.12	\$0.00	\$3.31	1,504	1,504.00	\$54,790.72
<b>Subsequent Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	2,089	1,389.19	\$53,478.40
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,893.19	\$108,269.12
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	2	1.33	\$51.20
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$1.65	\$0.00	\$0.00	2	0.16	\$3.30
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$1.65	\$0.00	\$0.00	0	0.00	\$0.00
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to	0.00	0.00	0.00	0.08	0.08	\$1.65	\$0.00	\$0.00	0	0.00	\$0.00
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Prepare and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	0	0.00	\$0.00
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$1.65	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1.49	\$54.50
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$33.12	\$0.00	\$3.31	14	14.00	\$510.02
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$16.96	\$0.00	\$3.31	5	2.50	\$101.35
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	3	2.00	\$76.80
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$16.96	\$0.00	\$3.31	1	0.50	\$20.27
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.00	\$708.44
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.84	0.08	1.00	\$33.12	\$0.00	\$3.31	2	2.00	\$72.86
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$16.96	\$0.00	\$3.31	1	0.50	\$20.27
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$3.31	7	4.66	\$179.20
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$16.96	\$0.00	\$3.31	2	1.00	\$40.54
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	8.16	\$312.87
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>2,923.01</b>	<b>\$109,386.69</b>

<sup>a</sup> Exhibit includes rounding.

EXHIBIT 3A  
PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$122.72/ Year	Mgr. \$72.54/ Year	Tech. \$54.04/ Year	Cler. \$32.51/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
<b>Contents of the Part A Permit Application</b>											
Read the regulations and instructions	2.00	1.00	3.00	0.00	6.00	\$480.10	\$0.00	\$0.00	3	18.00	\$1,440.30
Prepare the Site Identification Form	0.00	0.08	0.51	0.08	0.67	\$35.69	\$0.00	\$0.00	3	2.00	\$107.07
Prepare the Hazardous Waste Permit Information Form and reports	1.33	2.67	7.16	1.32	12.48	\$786.74	\$0.00	\$0.00	3	37.44	\$2,360.22
<b>Signatories to Permit Applications and Permit Application Reports</b>											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$122.82	\$0.00	\$0.00	3	7.50	\$368.46
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$106.57	\$0.00	\$0.00	1	2.00	\$106.57
<b>Submittal of Part A Permit Application</b>											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$139.08	\$0.00	\$5.82	3	9.00	\$434.70
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.50	2.00	1.00	3.50	\$176.86	\$0.00	\$0.00	1	3.50	\$176.86
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	79.44	\$4,994.18
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$180.62	\$0.00	\$0.00	7	21.00	\$1,264.34
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$180.62	\$0.00	\$0.00	13	39.00	\$2,348.06
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$471.68	\$0.00	\$5.82	7	47.25	\$3,342.50
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$471.68	\$0.00	\$5.82	13	87.75	\$6,207.50
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$335.85	\$0.00	\$5.82	7	35.00	\$2,391.69
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$335.85	\$0.00	\$5.82	7	35.00	\$2,391.69
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	265.00	\$17,945.78
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>344.44</b>	<b>\$22,939.96</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 3B**  
**PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION**  
**ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES <sup>a</sup>**

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$57.54/ Year	Mgr. \$54.02/ Year	Tech. \$32.32/ Year	Cler. \$20.62/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
<b>Contents of the Part A Permit Application</b>											
Read the regulations and instructions	2.00	1.00	3.00	0.00	6.00	\$266.06	\$0.00	\$0.00	1	6.00	\$266.06
Prepare the Site Identification Form	0.00	0.08	0.51	0.08	0.67	\$22.29	\$0.00	\$0.00	1	0.67	\$22.29
Prepare the Hazardous Waste Permit Information Form and reports	1.33	2.67	7.16	1.32	12.48	\$479.39	\$0.00	\$0.00	1	12.48	\$479.39
<b>Signatories to Permit Applications and Permit Application Reports</b>											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$79.95	\$0.00	\$0.00	1	2.50	\$79.95
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$69.64	\$0.00	\$0.00	0	0.00	\$0.00
<b>Submittal of Part A Permit Application</b>											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$90.26	\$0.00	\$5.82	1	3.00	\$96.08
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.50	2.00	1.00	3.50	\$112.27	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	24.65	\$943.77
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$118.66	\$0.00	\$0.00	0	0.00	\$0.00
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$118.66	\$0.00	\$0.00	2	6.00	\$237.32
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$271.38	\$0.00	\$5.82	0	0.00	\$0.00
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$271.38	\$0.00	\$5.82	2	13.50	\$554.40
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$196.82	\$0.00	\$5.82	0	0.00	\$0.00
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$196.82	\$0.00	\$5.82	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.50	\$791.72
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>44.15</b>	<b>\$1,735.49</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 3C**  
**PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION**  
**ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>**

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$57.54/ Year	Mgr. \$54.02/ Year	Tech. \$32.32/ Year	Cler. \$20.62/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
Review Part A Permit Applications	0.00	0.00	3.00	0.25	3.25	\$102.12	\$0.00	\$0.00	4	13.00	\$408.48
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.25	0.00	0.25	\$8.08	\$0.00	\$0.00	4	1.00	\$32.32
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.25	0.00	0.25	\$8.08	\$0.00	\$0.00	1	0.25	\$8.08
Review signature certifications	0.00	0.00	0.25	0.00	0.25	\$8.08	\$0.00	\$0.00	4	1.00	\$32.32
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$20.62	\$0.00	\$0.00	4	4.00	\$82.48
Notify applicant of deficiency in the Part A Permit Application	0.00	0.00	0.50	0.10	0.60	\$18.22	\$0.00	\$0.00	1	0.60	\$18.22
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.85	\$581.90
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Review revised Part A Permit Application	0	0	2	0.25	2.25	\$69.80	\$0.00	\$0.00	22	49.50	\$1,535.60
Enter revised Part A Permit Application information into RCRAInfo Database	0	0	0	0.5	0.50	\$10.31	\$0.00	\$0.00	22	11.00	\$226.82
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$66.52	\$0.00	\$0.00	7	10.50	\$465.64
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$66.52	\$0.00	\$0.00	7	10.50	\$465.64
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	81.50	\$2,693.70
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>101.35</b>	<b>\$3,275.60</b>

<sup>a</sup> Exhibit includes rounding.

EXHIBIT 4  
 2011 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$86.56/ Year	Mgr. \$76.38/ Year	Tech. \$54.94/ Year	Cler. \$23.44/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Hazardous Waste Report</b>											
Develop Hazardous Waste Report forms and instructions	0.00	8.00	80.00	20.00	108.00	\$5,475.04	\$0.00	\$20,920.00	0.50	54.00	\$13,197.52
Distribute Hazardous Waste Report forms and instructions	0.00	0.01	0.25	0.50	0.76	\$26.22	\$0.00	\$0.00	116	88.16	\$3,041.52
Develop computer capabilities required to compile national data	0.00	8.00	80.00	0.00	88.00	\$5,006.24	\$0.00	\$261,500.00	0.50	44.00	\$133,253.12
Assist respondents	0.00	0.01	0.50	0.50	1.01	\$39.95	\$0.00	\$0.00	116	117.16	\$4,634.20
Key entry of report submissions	0.00	0.01	0.08	0.25	0.34	\$11.02	\$0.00	\$0.00	89	30.26	\$980.78
Perform quality assurance	0.00	0.02	0.16	0.16	0.34	\$13.76	\$0.00	\$0.00	1,099	369.26	\$15,122.24
Prepare the National Report	0.00	8.00	200.00	40.00	248.00	\$12,536.64	\$0.00	\$52,300.00	0.50	124.00	\$32,418.32
Store the data	0.00	0.00	80.00	0.00	80.00	\$4,395.20	\$0.00	\$36,610.00	0.50	40.00	\$20,502.60
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>866.84</b>	<b>\$223,150.30</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 5**  
**NOTIFICATION OF REGULATED WASTE ACTIVITY**  
**ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>**

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$86.56/ Year	Mgr. \$76.38/ Year	Tech. \$54.94/ Year	Cler. \$23.44/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
<b>Notification prior to operating under exclusion(s)</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	24	6.00	\$329.76
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	24	54.00	\$2,777.76
<b>Notification by March 1 of each even numbered year thereafter</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	4	1.00	\$54.96
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	4	9.00	\$462.96
<b>Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	2	0.50	\$27.48
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	2	4.50	\$231.48
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	75.00	\$3,884.40
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	9,463	2,365.75	\$130,021.62
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	9,463	21,291.75	\$1,095,247.62
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.72	\$0.00	\$0.46	9,463	4,731.50	\$115,259.34
<b>Subsequent Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	36,057	9,014.25	\$495,423.18
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	36,057	81,128.25	\$4,173,237.18
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	118,531.50	\$6,009,188.94
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	8	2.00	\$109.92
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	8	18.00	\$925.92
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	20.00	\$1,035.84

<sup>a</sup> Exhibit includes rounding.



**EXHIBIT 5 (continued)**  
**NOTIFICATION OF REGULATED WASTE ACTIVITY**  
**ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN <sup>a</sup>**

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$86.56/ Year	Mgr. \$76.38/ Year	Tech. \$54.94/ Year	Cler. \$23.44/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	60	15.00	\$824.40
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	60	135.00	\$6,944.40
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.72	\$0.00	\$0.46	60	30.00	\$730.80
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	20	5.00	\$274.80
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	20	45.00	\$2,314.80
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.72	\$0.00	\$0.46	20	10.00	\$243.60
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	56	14.00	\$769.44
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	56	126.00	\$6,481.44
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	18	4.50	\$247.32
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	18	40.50	\$2,083.32
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	425.00	\$20,914.32
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	85	21.25	\$1,167.90
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	85	191.25	\$9,837.90
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.72	\$0.00	\$0.46	85	42.50	\$1,035.30
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	29	7.25	\$398.46
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	29	65.25	\$3,356.46
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$11.72	\$0.00	\$0.46	29	14.50	\$353.22
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	156	39.00	\$2,143.44
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	156	351.00	\$18,055.44
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	52	13.00	\$714.48
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$115.74	\$0.00	\$0.00	52	117.00	\$6,018.48
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	862.00	\$43,081.08
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>119,913.50</b>	<b>\$6,078,104.58</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 6**  
**PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION**  
**ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>**

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$86.56/ Year	Mgr. \$76.38/ Year	Tech. \$54.94/ Year	Cler. \$23.44/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
Review Part A Permit Applications	0.00	0.00	3.00	0.25	3.25	\$170.68	\$0.00	\$0.00	4	13.00	\$682.72
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	4	1.00	\$54.96
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	1	0.25	\$13.74
Review signature certifications	0.00	0.00	0.25	0.00	0.25	\$13.74	\$0.00	\$0.00	4	1.00	\$54.96
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$23.44	\$0.00	\$0.00	4	4.00	\$93.76
Notify applicant of deficiency in the Part A Application	0.00	0.00	0.50	0.10	0.60	\$29.81	\$0.00	\$0.00	1	0.60	\$29.81
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.85	\$929.95
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Review revised Part A Permit Application	0	0	2	0.25	2.25	\$115.74	\$0.00	\$0.00	22	49.50	\$2,546.28
Enter revised Part A Permit Application information into RCRAInfo Database	0	0	0	0.5	0.50	\$11.72	\$0.00	\$0.00	22	11.00	\$257.84
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$103.58	\$0.00	\$0.00	7	10.50	\$725.06
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$103.58	\$0.00	\$0.00	7	10.50	\$725.06
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	81.50	\$4,254.24
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>101.35</b>	<b>\$5,184.19</b>

<sup>a</sup> Exhibit includes rounding.

## EXHIBIT 7

2011 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION  
TOTAL ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN SUMMARY <sup>a</sup>

	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
<b>Information Collection Requirement</b>					
<b>Private Facilities</b>					
Hazardous Waste Report (Exhibit 1A)	161,587.78	\$9,384,912.05	\$0.00	\$55,220.16	\$9,440,132.21
Notification of Regulated Waste Activity (Exhibit 2A)	30,903.40	\$1,659,604.39	\$0.00	\$140,353.93	\$1,799,958.32
Part A Hazardous Waste Permit Application and Modification (Exhibit 3A)	344.44	\$22,724.62	\$0.00	\$215.34	\$22,939.96
<i>Subtotal</i>	<i>192,835.62</i>	<i>\$11,067,241.06</i>	<i>\$0.00</i>	<i>\$195,789.43</i>	<i>\$11,263,030.49</i>
<b>State and Local Government Facilities</b>					
Hazardous Waste Report (Exhibit 1B)	9,692.23	\$384,904.16	\$0.00	\$6,081.90	\$390,986.06
Notification of Regulated Waste Activity (Exhibit 2B)	2,923.01	\$97,368.08	\$0.00	\$12,018.61	\$109,386.69
Part A Hazardous Waste Permit Application and Modification (Exhibit 3B)	44.15	\$1,718.03	\$0.00	\$17.46	\$1,735.49
<i>Subtotal</i>	<i>12,659.39</i>	<i>\$483,990.27</i>	<i>\$0.00</i>	<i>\$18,117.97</i>	<i>\$502,108.24</i>
<b>State Agencies</b>					
Hazardous Waste Report (Exhibit 1C)	234,646.68	\$6,467,908.06	\$0.00	\$31,018.68	\$6,498,926.74
Part A Hazardous Waste Permit Application and Modification (Exhibit 3C)	101.35	\$3,275.60	\$0.00	\$0.00	\$3,275.60
<i>Subtotal</i>	<i>234,748.03</i>	<i>\$6,471,183.66</i>	<i>\$0.00</i>	<i>\$31,018.68</i>	<i>\$6,502,202.34</i>
<b>All Respondents</b>					
Hazardous Waste Report	405,926.69	\$16,237,724.27	\$0.00	\$92,320.74	\$16,330,045.01
Notification of Regulated Waste Activity	33,826.41	\$1,756,972.47	\$0.00	\$152,372.54	\$1,909,345.01
Part A Hazardous Waste Permit Application and Modification	489.94	\$27,718.25	\$0.00	\$232.80	\$27,951.05
<b>Total</b>	<b>440,243.04</b>	<b>\$18,022,414.99</b>	<b>\$0.00</b>	<b>\$244,926.08</b>	<b>\$18,267,341.07</b>
<b>2-Year Total</b>	<b>880,486</b>	<b>\$36,044,830</b>	<b>\$0</b>	<b>\$489,852</b>	<b>\$36,534,682</b>

<sup>a</sup> Exhibit includes rounding.

**EXHIBIT 8****2011 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION  
TOTAL ESTIMATED ANNUAL EPA HOUR AND COST BURDEN SUMMARY <sup>a</sup>**

<b>Information Collection Requirement</b>	<b>Total Hours per Year</b>	<b>Total Labor Cost per Year</b>	<b>Annual Capital/Startup Costs</b>	<b>Annual O &amp; M Costs</b>	<b>Total Cost per Year</b>
Hazardous Waste Report (Exhibit 4)	866.84	\$37,485.30	\$0.00	\$185,665.00	\$223,150.30
Notification of Regulated Waste Activity (Exhibit 5)	119,913.50	\$6,073,662.36	\$0.00	\$4,442.22	\$6,078,104.58
Part A Hazardous Waste Permit Application and Modification (Exhibit 6)	101.35	\$5,184.19	\$0.00	\$0.00	\$5,184.19
<b>Total</b>	<b>120,881.69</b>	<b>\$6,116,331.85</b>	<b>\$0.00</b>	<b>\$190,107.22</b>	<b>\$6,306,439.07</b>
<b>2-Year Total</b>	<b>241,764</b>	<b>\$12,232,664</b>	<b>\$0</b>	<b>\$380,214</b>	<b>\$12,612,878</b>

<sup>a</sup> Exhibit includes rounding.

