

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST NUMBER 1935.04
"STANDARDIZED PERMIT FOR RCRA HAZARDOUS WASTE
MANAGEMENT FACILITIES"**

January 2012

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

“Standardized Permit for RCRA Hazardous Waste Management Facilities”, ICR Number 1935.04.

1(b) Short Characterization

Under the authority of sections 3004, 3005, 3008 and 3010 of the Resource Conservation and Recovery Act (RCRA), as amended, the U.S. Environmental Protection Agency (EPA) is finalizing revisions to the RCRA hazardous waste permitting program to allow a “standardized permit”. The standardized permit would be available to facilities that generate hazardous waste and routinely manage the waste on-site in non-thermal units such as tanks, containers, and containment buildings. In addition, the standardized permit is available to facilities that receive hazardous waste generated off-site by a generator under the same ownership as the receiving facility, and then store or non-thermally treat the hazardous waste in containers, tanks, or containment buildings. The RCRA standardized permit would consist of two components: a uniform portion that is included in all cases, and a supplemental portion that the Director of a regulatory agency would include at his or her discretion. The uniform portion would consist of terms and conditions, relevant to the unit(s) at the permitted facility, and would be established on a national basis. The Director, at his or her discretion, may also issue a supplemental portion on a case-by-case basis. The supplemental portion would impose site-specific permit terms and conditions that the Director determines necessary to institute corrective action under section 264.101 (or State equivalent), or otherwise necessary to protect human health and the environment. Owners and operators would have to comply with the terms and conditions in the supplemental portion, in addition to those in the uniform portion.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

This section describes the need and authority for each type of information collection analyzed in this ICR. Information collection requirements for the standardized permit are authorized by sections 2002 and 3007 of RCRA, as amended. In particular, section 2002 gives the Administrator the authority to promulgate such regulations as are necessary to carry out the functions of this subchapter. Section 3007 gives EPA the authority to compel anyone who generates, stores, treats, transports, disposes of or otherwise handles or has handled hazardous wastes to furnish information related to such wastes and make such information available to the government for the purposes of enforcing the provisions of this chapter. EPA believes the information collection requirements are necessary to balance the reduction in regulatory burden with the Agency’s responsibility to protect human health and the environment.

APPLYING FOR A STANDARDIZED PERMIT

Section 270.275 requires that applicants for a standardized permit submit to the permitting agency information that will be used as the basis of the standardized permit application. This information includes:

- Part A permit information required by section 270.13;
- A summary of the pre-application public meeting and other materials required by section 124.31;
- Documentation of compliance with the location standards of sections 267.18 and 270.14(b)(11);
- Information that allows the Director to carry out his obligations under other Federal laws required in section 270.3;
- Solid waste management unit information required by section 270.14(d); and
- A signed certification of the facility's compliance with part 267, as specified at section 270.280.
- A report documenting the results of the compliance audit as required by section 270.280.
- A closure plan prepared in accordance with part 267 subpart G.
- The most recent closure cost estimate for your facility prepared under §267.142 and a copy of the documentation required to demonstrate financial assurance under §267.143. For a new facility, you may gather the required documentation 60 days before the initial receipt of hazardous wastes.
- A waste analysis plan, if you manage wastes generated off-site
- Documentation showing that the same person owns both the waste generator and receiving facility, if you manage waste generated off-site

EPA needs this information to comprehensively evaluate the potential risk posed by facilities seeking permits. This information aids EPA in meeting its goal of ascertaining and minimizing risks to human health and the environment from hazardous waste management facilities.

In addition, facilities that store or treat hazardous waste under a standardized permit must keep at their facilities general types of information (section 270.290), as well as unit-specific information for containers (section 270.300), tanks (section 270.305), equipment subject to part 264, subpart BB (section 270.310), and tanks and containers subject to part 264, subpart CC (section 270.315). EPA anticipates that the owner or operator will use this information to ensure that tanks, containers, and other equipment are in good condition and that operating requirements are being satisfied, and to prevent placing in proximity wastes that are incompatible with other

wastes that are likely to ignite or explode. EPA needs this information to evaluate compliance of facilities with the permitting standards. These requirements contribute to EPA's goal of insuring that hazardous waste management facilities are operated in a manner fully protective of human health and the environment.

MAINTAINING A STANDARDIZED PERMIT

Sections 124.211, 124.212, 124.213, and 124.214 specify procedures for making routine and significant changes to the standardized permit. Section 124.212 requires owners and operators seeking to make routine changes (Class 1 permit modification not requiring prior approval under 40 CFR 270.42, Appendix I) to their standardized permits to submit to the Director the revised information; and, in cases where the routine change amends information submitted under section 270.275, to provide notice of the changes to the facility mailing list and to state and local governments, in accordance with the procedures in sections 124.10(c)(1)(ix) and (x). Section 124.213 requires owners and operators seeking to make routine changes with prior approval to submit their requests for changes to the Director for approval and follow the procedures in section 124.212(b)(1) - (2). Section 124.214 requires owners and operators seeking to make significant changes to their standardized permits to provide notice and conduct a public meeting. After holding the public meeting, the owner or operator of the facility must submit a modification request to the Director.

EPA needs this information to comprehensively evaluate whether requests for routine or significant changes should be granted. The permit modification procedures contribute to EPA's goal of providing a role for the public in the permitting process. In general, these informational requirements aid in meeting EPA's goal of ascertaining and minimizing risks to human health and the environment from hazardous waste management facilities.

GENERAL FACILITY STANDARDS

40 CFR part 267, subpart B (sections 267.10 through 267.18) specifies general facility standards that apply to owners and operators of facilities who treat or store hazardous waste under a standardized permit. To comply with this subpart, owners and operators must follow record keeping and reporting requirements for waste analyses (section 267.13); security (section 267.14); inspections (section 267.15); employee training (section 267.16); management of ignitable, reactive, or incompatible wastes (section 267.17); and facility location (section 267.18).

(1) Waste Analyses

EPA and owners and operators use information obtained in waste analysis results to determine: (1) whether the facility can adequately handle the waste, and (2) whether the waste is really what the generator claims it to be. The owner or operator also uses information obtained from the waste analysis to determine whether there are any potential dangers from handling the waste.

(2) Security

EPA uses information on security to ensure that the owner and operator of the facility has taken the necessary measures to ensure that there is no physical contact with the waste, structures, or equipment within the active portion of the facility that would injure people or livestock.

(3) Inspections

EPA and owners and operators use information in the inspection log to determine whether facility equipment is safe for handling hazardous waste. The inspection requirement contributes to EPA's goal of preventing hazardous waste constituents from being released into the environment due to faulty or deteriorated equipment.

(4) Employee Training

Both EPA and owners and operators use information in employee training records to determine whether employees have acquired the necessary expertise to perform their jobs. EPA also reviews personnel records to determine whether employees are receiving a level of training that is commensurate with their duties and responsibilities as well as their ability to respond to any emergency situations at the facility. Requiring owners and operators to maintain personnel training documents decreases the likelihood that employees are unqualified to handle hazardous waste or respond to emergencies. The personnel record keeping requirement contributes to EPA's goal of minimizing the potential for employee-related mistakes that may threaten human health and the environment.

(5) Demonstration of Compliance for Ignitable, Reactive, or Incompatible Wastes

EPA uses information in the documentation of compliance for ignitable, reactive, or incompatible wastes to determine whether facilities are operating in a manner that is protective of human health and the environment. The documentation requirement contributes to EPA's goal of minimizing unanticipated damage from the treatment, storage, or disposal of hazardous waste.

(6) Facility Location

EPA and owners and operators use site-specific information to determine whether a location is suitable for conducting hazardous waste management activities in a manner that does not pose a threat to human health or the environment.

EPA needs all the information described above to evaluate the compliance of facilities with the permitting standards. These requirements contribute to EPA's goal of insuring that hazardous waste management facilities are operated in a manner fully protective of human health and the environment.

PREPAREDNESS AND PREVENTION

Sections 267.30 through 267.36 require owners and operators to design, construct, maintain, and operate their facilities in a manner that minimizes threats to human health and the environment caused by the release of waste from a fire, explosion, or any unplanned event. Section 267.36(b) specifically requires owners and operators to document any refusal on the part of any local authorities to enter into an arrangement to handle emergencies. EPA and the owner and operator of a facility use this information to ensure that adequate emergency response personnel are available, if needed, and to document that all necessary arrangements with State or local authorities have been made.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Section 3004(a)(5) of RCRA, as amended, requires EPA to develop standards for contingency plans for effective action to minimize unanticipated damage from any treatment, storage, or disposal of any such hazardous waste. Sections 267.50 through 267.58 require all owners and operators of hazardous waste facilities to prepare and maintain contingency plans, and to notify State and local authorities and prepare and emergency reports whenever an imminent or actual emergency situation occurs. EPA reviews the contingency plan and emergency reports to determine whether a facility has developed adequate procedures to respond to unplanned sudden or non-sudden releases of hazardous waste or hazardous constituents to air, soil, or surface water. Notifications to State and local authorities facilitate remedial actions and evacuations, if necessary. Requiring facilities to develop and maintain contingency plans and prepare emergency response reports and notifications contributes to EPA's goal of minimizing unanticipated damage from the treatment, storage, or disposal of hazardous waste.

RECORD KEEPING, REPORTING, AND NOTIFYING

Section 267.70 through 267.74 direct owners or operators of facilities that treat or store hazardous waste under a standardized permit to keep an operating record at the facility. The operating record must include, among other things, a description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility; records and results of waste analyses performed; summary reports and details of all incidents that require implementing the contingency plan; and records and results of inspection reports. EPA uses information collected pursuant to these regulations to select appropriate corrective action and cleanup measures should an unanticipated release of hazardous waste occur. EPA compliance officials refer to the operating record to determine the following: (1) what cleanup measures are appropriate and (2) whether operating requirements can be better tailored to the needs of a particular site. EPA anticipates that the owner or operator will use information included in the operating record to prevent receiving, or placing in proximity, wastes that are incompatible with other wastes that are likely to ignite or explode. Requiring facilities to develop and maintain an operating record and conduct the record keeping activities contributes to EPA's goal of minimizing damage to the environment due to the treatment, storage, or disposal of hazardous waste.

CLOSURE

40 CFR part 267, subpart G (sections 267.110 through 267.117) requires owners and operators to develop closure plans, amend these plans when appropriate, and submit to EPA closure certifications. EPA reviews information in the closure plans to determine whether closure activities will comply with the regulatory requirements. EPA uses information in the closure certifications to determine that closure took place in accordance with the approved closure plan.

FINANCIAL REQUIREMENTS

Section 3004(a)(6) of the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, requires EPA to promulgate regulations that include requirements respecting "the maintenance of operations of such facilities and requiring such additional qualifications as to ... financial responsibility (including financial responsibility for corrective action) as may be necessary or desirable."

The need for financial assurance of closure care is indicated by the numerous instances of environmental damage resulting from abandonment of hazardous waste management facilities and other failures by owners and operators to provide adequately for closure care. The likelihood of such failure is increased by the fact that the costs for closure care are expected to commence when the economic value of the facility is either at a minimum or nonexistent.

EPA believes that significant numbers of owners and operators would lack the ability to provide for closure care without effective requirements for financial assurance. Consequently, the Agency developed 40 CFR part 267, subpart H financial responsibility requirements for closure care.

The liability requirements are designed to assure that funds will be available during the operating life of a facility from which third parties can seek compensation for bodily injury and property damage arising from the operation of the facility. The liability requirements are necessary for several reasons. First, the requirements provide protection to human health and the environment by assuring that funds are available to owners and operators to compensate for damage caused by accidents at hazardous waste facilities, including payments for bodily injury and property damage. In addition, the Agency believes that without liability coverage requirements, there would be less public confidence in and greater opposition to proposed and existing hazardous waste facilities. The liability requirements also result in other potential benefits for human health and the environment: the incentive, in the form of lower insurance premiums, to improve design and operation of the facility, and the oversight that insurers provide over facility operations.

USE AND MANAGEMENT OF CONTAINERS

Sections 267.172 and 267.15(d) require owners and operators that store or treat hazardous waste in containers to inspect areas where they store containers, at least weekly, and record the inspection results. EPA needs this information to evaluate the compliance of facilities with the permitting standards and ensure that containers used for the storage and treatment of hazardous

waste, under the standardized permit, do not pose a threat to human health and the environment. These requirements contribute to EPA's goal of safe management of hazardous waste.

TANK SYSTEMS

40 CFR part 267, subpart J specifies record keeping and reporting requirements associated with demonstrations for secondary containment waivers (section 267.190), design and construction standards (section 267.191), installation requirements (section 267.194), inspection requirements (section 267.199), and leaks and spills (section 267.200). EPA needs this information to evaluate the compliance of facilities with the permitting standards and ensure that tank systems used for the storage and treatment of hazardous waste, under the standardized permit, do not pose a threat to human health and the environment. These requirements contribute to EPA's goal of safe management of hazardous waste.

CONTAINMENT BUILDINGS

40 CFR part 267, subpart DD specifies record keeping and reporting requirements associated with inspections (section 267.1103); demonstrations for secondary containment requirement waivers (section 267.1104); containment buildings containing areas both with and without secondary containment (section 267.1105); and detection of releases (section 267.1106). EPA needs this information to evaluate the compliance of facilities with the permitting standards and ensure that containment buildings used for the storage and treatment of hazardous waste, under the standardized permit, do not pose a threat to human health and the environment. These requirements contribute to EPA's goal of safe management of hazardous waste.

2(b) Practical Utility and Users of the Data

APPLYING FOR A STANDARDIZED PERMIT

EPA uses information submitted by facilities to evaluate exposure potential and minimize any risks to human health from hazardous waste management facilities. If EPA determines that a facility poses a substantial risk to human health, EPA may request that the Agency for Toxic Substances and Disease Registry conduct a health assessment.

EPA uses information regarding specific units at facilities to evaluate the adequacy of each unit to manage hazardous wastes. Additional information is required because each of the different types of hazardous waste management units present different risks to the environment and consequently requires different standards. EPA reviews the submittals of each type of hazardous waste management unit to evaluate whether it is designed, constructed, and operated in a manner protective of human health and the environment. EPA uses the information required by part 264, subparts BB and CC to ensure compliance with air emission standards.

MAINTAINING A STANDARDIZED PERMIT

EPA uses permit information to evaluate the initial permit application and any subsequent request for modification. The public may also use draft EPA permit and permit modification

determinations, which incorporate data submitted by facilities, to assess hazardous waste management facilities being developed in their communities.

GENERAL FACILITY STANDARDS

EPA uses the information requirements in 40 CFR parts 267 and 270 for owners and operators submitting standardized permit applications to evaluate compliance with various elements of the regulations. The waste analysis and waste analysis plan, as well as the inspection schedule and documentation of compliance for ignitable or incompatible wastes, are primarily internal record keeping requirements used by owners and operators of facilities to assure that they can adequately handle the waste, to assure that the incoming waste is really what the generator claims it to be, and to prevent undetected releases or reactions of hazardous waste on-site. Much of the information in the waste analysis plan will also be used to provide a quality assurance check on both the generator and the owners' and operators' facilities. Both EPA and owners and operators use information in the employee training records to ensure that employees acquire the necessary expertise to perform their jobs. During inspections, EPA reviews job descriptions and training documents to determine whether each person is receiving a level of training that is commensurate with the person's duties and responsibilities as well as the ability to respond to any emergency situations at the facility.

PREPAREDNESS AND PREVENTION

The facility owner or operator uses the documented refusal on the part of the State or local authorities to enter in emergency response arrangements to demonstrate that he or she has undertaken all the necessary activities to minimize threats to human health and the environment caused by the release of waste from a fire, explosion, or any unplanned event.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Local emergency response teams, facility owners or operators, and EPA use information included in the contingency plan to assure an appropriate response to any unplanned release of hazardous waste or hazardous waste constituents. EPA reviews information in the contingency plan and emergency report to determine whether additional site-specific emergency provisions are necessary.

RECORD KEEPING, REPORTING, AND NOTIFYING

The facility owner or operator uses information included in the operating record and waste disposal location and quantity records to prevent the facility from placing in proximity wastes that are incompatible or that are likely to ignite or explode. If an unanticipated release of hazardous waste occurs, the owner or operator may review information in the operating record to determine the composition of the waste. Reviewing information in the operating record facilitates the owner's or operator's selection of an appropriate corrective action and cleanup measure. By providing facility-specific data, the operating record also enables EPA compliance officials to determine whether operating requirements can be better tailored to the needs of a particular site.

CLOSURE

EPA uses information contained in closure plans to determine whether an owner or operator's planned closure activities will comply with environmental regulations. EPA officials use information contained in closure certifications to ensure that the owner or operator closed his/her facility according to the specifications outlined in the approved closure plan. EPA uses information contained in demonstrations to ensure that any activities taking place during the closure period are protective of human health and the environment.

FINANCIAL REQUIREMENTS

EPA uses the financial insurance information requirements to evaluate the facility owner's financial ability to close the facility and to respond to any contingencies. The closure and liability coverage financial instruments submitted by the owner or operator are reviewed by EPA to determine compliance with the applicable subpart H regulations. This review involves determinations of the validity of the instrument, acceptability of the financial assurance provider, adequacy of the instrument amount, and fulfillment of the other regulatory requirements. The information is also used to direct funds for closure and liability coverage in the event of default or bankruptcy of a facility owner or operator.

USE AND MANAGEMENT OF CONTAINERS

EPA uses information on containers obtained during facility inspections to evaluate the adequacy of each container to manage hazardous wastes, and ensure that containers are being used in a manner protective of human health and the environment.

TANK SYSTEMS

EPA uses information on tank systems obtained during facility inspections to evaluate the adequacy of each tank to manage hazardous wastes, and ensure that tank systems are being used in a manner protective of human health and the environment.

CONTAINMENT BUILDINGS

EPA uses information on containment buildings obtained during facility inspections to evaluate the adequacy of each containment building to manage hazardous wastes, and ensure that containment buildings are being used in a manner protective of human health and the environment.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

In finalizing the standardized permit rule, EPA streamlined the permit process by allowing certain types of facilities to obtain and modify permits more easily while maintaining the protectiveness currently existing in the individual RCRA permit process. Thus, facility owners and operators are relieved of certain RCRA record keeping and reporting requirements that currently exist under the RCRA permitting process.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on August 9, 2011 (76 FR 48857) and provided a 60 day comment period for this ICR. No comments were received.

3(c) Consultations

With only 5 states authorized for the standardized permit rule, we found only one facility that had been issued a standardized permit. A consultation was conducted with that one facility, BP Exploration in Alaska which received a standardized permit from EPA Region 10. A call was conducted on December 1, 2011 with Ms. Colleen Burg of BP. When asked about the reporting and recordkeeping burden estimates as presented in the supporting statement, she commented that the “annual reporting burden” estimates of 53 to 57 hours were low. Her experience with BP’s permit indicated burden hours of at least twice those estimates. Ms. Burg said the burden was more on the order of 80 to 100 hours. The increased burden was in three areas: the community meetings, the 3rd party facility audit, and preparing the closure plan. However, as explained in section 6(d) below, the burden for community meetings, audits, and closure plans are covered by two other ICRs, the *General Hazardous Waste Facility Standards ICR* and the *Part B Permit Application, Permit Modifications, and Special Permits ICR*. She commented that the “record keeping burden” range of 31 to 178 hours was within reason.

3(d) Effects of Less Frequent Collection

The standardized permit application procedures are less cumbersome than the procedures for an individual permit. Owners and operators do not have to submit the amount of information needed to support an individual permit application, although they need to keep the information at their facility. In addition, the procedures for modifying standardized permits would allow owners and operators to make certain types of routine changes without prior approval, provided that they inform both the regulatory agency and the public of the changes. EPA believes the collection frequencies specified in this ICR are necessary to ensure protection of 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, EPA's Information Collection Review Handbook, and other applicable OMB guidance.

3(f) Confidentiality

Section 3007(b) of RCRA and 40 CFR part 2, subpart B, which define EPA's general policy on public disclosure of information, contain provisions for confidentiality. EPA does not anticipate requesting any confidential information.

3(g) Sensitive Questions

No questions of a sensitive nature are included in the information collection requirements.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

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

323110	Commercial Lithographic Printing
323114	Quick Printing
325131	Inorganic Dye and Pigment Manufacturing
325188	All Other Basic Inorganic Chemical Manufacturing
325998	All Other Miscellaneous Chemical Product Manufacturing
331311	Alumina refining
325211	Plastics Material and Resins Manufacturing
32551	Paint and Coating Manufacturing
32511	Petrochemical Manufacturing
32512	Industrial Gas Manufacturing
325188	All Other Inorganic Chemical Manufacturing
325193	Ethyl Alcohol Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325998	All Other Miscellaneous Chemical Product Manufacturing
311942	Spice and Extract Manufacturing
32411	Petroleum Refineries
332813	Electroplating, Plating, Polishing, Anodizing and Coloring
33271	Machine Shops
332991	All Other Miscellaneous Fabricated Metal Product Manufacturing
333319	Other Commercial or Service Industry Machinery Manufacturing Accessories
333999	All Other General Purpose Machinery Manufacturing
336399	All Other Motor Vehicle Part Manufacturing
334	Computer and Electronic Product Manufacturing
336	Transportation Equipment Manufacturing
48422	Specialized Freight (except Used Goods) Trucking, Local
56211	Waste Collection
22111	Electric Power Generation

22112	Fossil Fuel Electric Power Generation
22132	Sewage Treatment Facilities
56292	Materials Recovery Facilities
56221	Waste Treatment and Disposal
42271	Petroleum Bulk Stations and Terminals
45431	Fuel Dealers
4411	Automobile Dealers
4471	Gasoline Stations
811111	General Automotive Repair

4(b) Information Requested

This section describes information collection requirements applicable to facilities that are affected by this ICR.

APPLYING FOR A STANDARDIZED PERMIT

(1) General Information Requirements

(i) Data items

Sections 124.202, 270.275, 270.280, and 270.285 require owners and operators wishing to obtain a standardized permit to provide the following data items:

- A written notice to the Director that the owner or operator intends to operate under a standardized permit;
- The Part A information required by section 270.13 (this information is described and burdened under the Part A Permit Application ICR);
- A meeting summary and other materials required by section 124.31;
- Documentation of compliance with the location standards of sections 267.18 and 270.14(b)(11), including:
 - An identification of the political jurisdiction in which the facility is proposed to be located;
 - If the facility is proposed to be located in an area listed in Appendix VI of part 264, a demonstration of compliance with the seismic standard as defined under section 264.18(a). This demonstration may be made using either published geologic data or data obtained from field investigations carried out by the applicant;
 - An identification of whether the facility is located within a 100-year floodplain

- Information that allows the Director to carry out his obligations under other Federal laws required in section 270.3;
- Solid waste management unit information required by section 270.14(d), including:
 - The location of each unit on the topographic map required under section 270.14(b)(19);
 - Designation of the type of each unit;
 - General dimensions and structural description of each unit;
 - Dates when each unit was operated;
 - Specification of all wastes that have been managed at each unit, to the extent available;
 - All available information pertaining to any release of hazardous wastes or hazardous constituents from each unit (section 270.14(d)(2));
 - Results of sampling and analysis, where the Director ascertains that a RCRA Facility Assessment is necessary.
- A signed certification of the facility's compliance with part 267, as specified at section 270.280; and
- A closure plan prepared in accordance with part 267 subpart G.
- The most recent closure cost estimate for your facility prepared under §267.142 and a copy of the documentation required to demonstrate financial assurance under §267.143. For a new facility, you may gather the required documentation 60 days before the initial receipt of hazardous wastes.
- Results of a compliance audit, as required by section 270.280.
- A waste analysis plan, if you manage waste generated off-site.
- Documentation showing that the same person owns both the waste generator and the receiving facility, if you manage waste generated off-site.

(ii) Respondent activities

In order to obtain a standardized permit, owners and operators will have to perform the following activities:

- Read the regulations;
- Prepare a written notice of intent to operate under a standardized permit;
- Obtain the Part A information;
- Obtain the meeting summary and other materials required by section 124.31;
- Develop documentation of compliance with location standards;
- Prepare information that allows the Director to carry out his obligations under other Federal laws;
- Prepare the solid waste management unit information;
- Prepare and sign the certification of compliance with part 267;
- If necessary, prepare a schedule of compliance with part 267;
- Prepare a closure plan;
- Prepare a closure cost estimate.
- Prepare documentation to demonstrate financial assurance under §267.143; and,
- Conduct a compliance audit and prepare a report of the results of the audit.
- If you manage waste generated off-site, prepare a waste analysis plan.
- If you manage waste generated off-site, prepare documentation showing that the same person owns both the waste generator and the receiving facility.
- Submit the above information to the Director.

(2) Record Keeping Requirements

(i) Data items

Section 270.290 requires owners and operators applying for a standardized permit to keep the following information at their facilities:

- A general description of the facility;
- Chemical and physical analyses of the hazardous waste and hazardous debris handled at the facility. At a minimum, these analyses must contain all the information required to treat or store the wastes properly under the requirements of part 267;

- A copy of the waste analysis plan required by section 267.13(b);
- A description of the security procedures and equipment required by section 267.14, or a justification demonstrating the reasons for a waiver from these requirements;
- A copy of the general inspection schedule required by section 267.15(b), as well as the applicable inspection schedule requirements of sections 267.174, 267.193, 267.195, 267.1033, 267.1052, 267.1053, 267.1058, and 267.1088;
- A justification for any modification of the preparedness and prevention requirements of part 267, subpart C;
- A copy of the contingency plan required by part 267, subpart D;
- A description of the procedures, structures, or equipment used at the facility to:
 - Prevent hazards in unloading operations;
 - Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding;
 - Prevent contamination of water supplies;
 - Mitigate effects of equipment failure and power outages;
 - Prevent undue exposure of personnel to hazardous waste; and
 - Prevent releases to the atmosphere;
- A description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes as required by section 267.17;
- A description of traffic patterns, estimated volumes, and controls near the facility;
- An outline of both the introductory and continuing programs you will use to prepare employees to operate or maintain the facility safely, as required by section 267.16;
- A brief description of how training will be designed to meet actual job tasks under section 267.16(a)(3) requirements;
- A copy of the closure plan required by section 267.112. Specific requirements in sections 267.178, 267.197, and 267.1102 should be included, where applicable, as part of the plans;

- The most recent closure cost estimate for the facility prepared under section 267.142, and a copy of the documentation required to demonstrate financial assurance under section 267.143. For new facilities, this documentation must be gathered at least 60 days prior to the initial receipt of hazardous wastes;
- Where applicable, a copy of the insurance policy or other documentation that complies with the liability requirements of section 267.147. For a new facility, documentation showing the amount of insurance meeting the specification of section 267.147(a) that the owner or operator plans to have in effect before initial receipt of hazardous waste for treatment or storage;
- Where appropriate, proof of coverage by a State financial mechanism, as required by section 267.149 or section 267.150; and
- A topographic map that meets the requirements specified at section 270.290(s).

(ii) *Respondent activities*

In order to provide the data items listed above, owners and operators will have to perform the following activities:

- Read the regulations;
- Prepare and maintain a general description of the facility;
- Maintain documentation of chemical and physical analyses of the hazardous waste and hazardous debris handled at the facility (this activity is covered under section 267.13(a));
- Maintain a copy of the waste analysis plan required by section 267.13(b);
- Prepare and maintain a description of the security procedures and equipment required by section 267.14, or a justification demonstrating the reasons for a waiver from these requirements;
- Maintain a copy of the applicable inspection schedules;
- Prepare and maintain a justification for any modification of the preparedness and prevention requirements of part 267, subpart C;
- Maintain a copy of the contingency plan;
- Prepare and maintain a description of the procedures, structures, or equipment used at the facility to:
 - Prevent hazards in unloading operations;

- Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding;
- Prevent contamination of water supplies;
- Mitigate effects of equipment failure and power outages;
- Prevent undue exposure of personnel to hazardous waste; and
- Prevent releases to the atmosphere;
- Maintain a description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes;
- Prepare and maintain a description of traffic patterns, estimated volumes, and controls near the facility;
- Maintain an outline of both the introductory and continuing programs you will use to prepare employees to operate or maintain the facility safely, as required by section 267.16;
- Maintain a brief description of how training will be designed to meet actual job tasks;
- Maintain a copy of the closure plan;
- Maintain records of most recent closure cost estimate and a copy of the documentation required to demonstrate financial assurance;
- Where applicable, maintain a copy of the insurance policy or other documentation that complies with the liability requirements of section 267.147;
- Where appropriate, maintain proof of coverage by a State financial mechanism; and
- Obtain and maintain a topographic map.

(3) Container Information Requirements

(i) Data items

In addition to the general information requirements listed at section 270.290, section 270.300 requires owners and operators of facilities with containers to keep the following information at their facilities:

- A description of the containment system to demonstrate compliance with section 267.173;

- For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with section 267.173. This description must show the following:
 - Basic design parameters, dimensions, and materials of construction;
 - How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system;
 - The capacity of the containment system relative to the number and volume of containers to be stored;
 - Provisions for preventing or managing run-on; and
 - How accumulated liquids can be analyzed and removed to prevent overflow;
- For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with section 267.173(c), including:
 - Test procedures and results of other documentation or information to show that the wastes do not contain free liquids; and
 - A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids;
- Sketches, drawings, or data demonstrating compliance with section 267.174 (location of buffer zone and containers holding ignitable or reactive wastes) and section 267.175(c) (location of incompatible wastes), where applicable;
- Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with sections 267.175(a) and (b); and
- Information on air emission control equipment, as required by section 270.315.

(ii) *Respondent activities*

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Prepare and maintain a description of the containment system;
- For storage areas that store containers holding wastes that do not contain free liquids, prepare and maintain a demonstration of compliance with section 267.173(c);

- Where applicable, obtain and maintain sketches, drawings, or data demonstrating compliance with sections 267.174 and 267.175(c);
- Where incompatible wastes are stored or otherwise managed in containers, prepare and maintain a description of the procedures used to ensure compliance with sections 267.175(a) and(b); and
- Maintain information on air emission control equipment;

(4) Tank Information Requirements

(i) Data items

In addition to the general information requirements listed at section 270.290, section 270.305 requires owners and operators of facilities with tanks to keep the following information at their facilities:

- A written assessment that is reviewed and certified by an independent, qualified, registered professional engineer on the structural integrity and suitability for handling hazardous waste of each tank system, as required under sections 267.191 and 267.192;
- The dimensions and capacity of each tank;
- A description of feed systems, safety cutoff, bypass systems, and pressure controls;
- A diagram of piping, instrumentation, and a process flow for each tank system;
- A description of materials and equipment used to provide external corrosion protection, as required under section 267.192;
- For new tank systems, a detailed description of how the tank system(s) will be installed in compliance with section 267.194;
- Detailed plans and a description of how the secondary containment system for each tank system is or will be designed, constructed, and operated to meet the requirements of sections 267.195 and 267.196;
- A description of controls and practices to prevent spills and overflows, as required under section 267.198;
- For tank systems in which ignitable, reactive, or incompatible wastes are to be stored or treated, a description of how operating procedures and tank system and facility design will achieve compliance with the requirements of sections 267.202 and 267.203; and
- Information on air emission control equipment as required by section 270.315.

(ii) *Respondent activities*

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Maintain an engineer's written assessment on the structural integrity and suitability for handling hazardous waste of each tank system;
- Document and maintain the dimensions and capacity of each tank;
- Prepare and maintain a description of feed systems, safety cutoff, bypass systems, and pressure controls;
- Prepare and maintain a diagram of piping, instrumentation, and a process flow for each tank system;
- Maintain a description of materials and equipment used to provide external corrosion protection;
- For new tank systems, prepare and maintain a detailed description of how the tank system(s) will be installed in compliance with section 267.194;
- Prepare and maintain detailed plans and a description of how the secondary containment system for each tank system is or will be designed, constructed, and operated to meet the requirements of sections 267.195 and 267.196;
- Prepare and maintain a description of controls and practices to prevent spills and overflows;
- For tank systems in which ignitable, reactive, or incompatible wastes are to be stored or treated, prepare and maintain a description of how operating procedures and tank system and facility design will achieve compliance with the requirements of sections 267.202 and 267.203; and
- Maintain information on air emission control equipment.

(5) Equipment Information Requirements

(i) *Data items*

In addition to the general information requirements listed at section 270.290, section 270.310 requires owners and operators of facilities with equipment to which subpart BB of part 264 applies to keep the following information at their facilities:

- For each piece of equipment to which subpart BB of part 264 applies:
 - Equipment identification number and hazardous waste management unit identification;
 - Approximate locations within the facility;
 - Type of equipment;
 - Percent by weight of total organics in the hazardous waste stream at the equipment;
 - Hazardous waste state at the equipment (e.g., gas/vapor or liquid); and
 - Method of compliance with the standard;
- For facilities that cannot install a closed-vent system and control device to comply with 40 CFR part 264 subpart BB on the effective date that the facility becomes subject to the subpart BB provisions, an implementation schedule as specified in section 264.1033(a)(2);
- For owners and operators who apply for permission to use a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system and choose to use test data to determine the organic removal efficiency or the total organic compound concentration achieved by the control device, a performance test plan as specified in section 264.1035(b)(3);
- Documentation that demonstrates compliance with the equipment standards in sections 264.1052 and 254.1059; and
- Documentation to demonstrate compliance with section 264.1060. This documentation must include the following information:
 - A list of all information references and sources used in preparing the documentation;
 - Records, including the dates, of each compliance test required by section 264.1033(j);
 - A design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams. The design analysis must address the vent stream characteristics and control device operation parameters as specified in section 260.1035(b)(4)(iii);
 - A statement, signed and dated by the owner or operator, certifying that the operating parameters used in the design analysis reasonably represent the

conditions that exist when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur; and

- A statement, signed and dated by the owner or operator, certifying that the control device is designed to operate at an efficiency of 95 weight percent or higher.

(ii) *Respondent activities*

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- For each piece of equipment to which subpart BB of section 264 applies:
 - Maintain the equipment identification number and hazardous waste management unit identification;
 - Prepare and maintain approximate locations within the facility;
 - Prepare and maintain a description of the type of equipment;
 - Prepare and maintain a description of the percent by weight of total organics in the hazardous waste stream at the equipment;
 - Prepare and maintain a description of the hazardous waste state at the equipment (e.g., gas/vapor or liquid); and
 - Prepare and maintain a description of the method of compliance with the standard;
- For facilities that cannot install a closed-vent system and control device to comply with 40 CFR part 264 subpart BB on the effective date that the facility becomes subject to the subpart BB provisions, prepare and maintain an implementation schedule;
- For owners and operators who apply for permission to use a control device other than a thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system and choose to use test data to determine the organic removal efficiency or the total organic compound concentration achieved by the control device, develop and maintain a performance test plan as specified;
- Develop and maintain documentation that demonstrates compliance with the equipment standards in sections 264.1052 and 254.1059; and
- Develop and maintain documentation to demonstrate compliance with section 264.1060.

(6) Air Emissions Control Requirements

(i) Data items

In addition to the general information requirements listed at section 270.290, section 270.315 requires owners and operators of facilities with equipment subject to subpart CC of part 264 to keep the following information at their facilities:

- Documentation for each floating roof cover installed on a tank subject to sections 264.1084(d)(1) or (d)(2) that includes information prepared by the owner or operator or provided by the manufacturer describing the cover design;
- A certification that the cover meets applicable design specifications listed in sections 264.1084(e)(1) or (f)(1);
- Identification of each container area subject to the requirements of part 264, subpart CC, and a certification that the requirements of this subpart are met;
- Documentation for each enclosure used to control air pollutant emissions from tanks or containers under requirements of sections 264.1084(d)(5) or 264.1086(e)(1)(ii). This documentation must include records for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent enclosure as specified in section 52.741, appendix B;
- Documentation for each closed-vent system and control device installed under requirements of section 264.1087 that includes design and performance information as specified in section 270.24(c) and (d); and
- An emission monitoring plan for both Method 21 in 40 CFR part 60, appendix A, and control device monitoring methods. This plan must include monitoring points, monitoring methods for control devices, monitoring frequency, procedures for documenting exceedences, and procedures for mitigating noncompliances.

(ii) Respondent activities

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Prepare and maintain documentation for each floating roof cover installed on a tank subject to sections 264.1084(d)(1) or (d)(2);
- Prepare and maintain a certification that the cover meets applicable design specifications listed in sections 264.1084(e)(1) or (f)(1);

- Prepare and maintain an identification of each container area subject to the requirements of part 264, subpart CC, and a certification that the requirements of this subpart are met;
- Prepare and maintain documentation for each enclosure used to control air pollutant emissions from tanks or containers under requirements of sections 264.1084(d)(5) or 264.1086(e)(1)(ii);
- Prepare and maintain documentation for each closed-vent system and control device installed under requirements of section 264.1087; and
- Develop and maintain an emission monitoring plan for both Method 21 in 40 CFR part 60, appendix A, and control device monitoring methods.

(7) Switching from an Individual RCRA Permit to a Standardized Permit

(i) Data items

Section 124.203 allows owners and operators to switch their individual RCRA permits to standardized permits by submitting a request to the Director requesting that their individual permits be revoked and reissued as a standardized permit, in accordance with section 124.5.

(ii) Respondent activities

In order to provide the data item listed above, owners and operators seeking to switch from a RCRA individual permit to a standardized permit will need to perform the following activities:

- Read the regulations; and
- Prepare and submit the request to the Director.

(8) Reapplying for a Standardized Permit

(i) Data items

Section 270.10(h) requires owners and operators wishing to reapply for a standardized permit to submit a notice of intent under 270.10(b)(1) at least 180 days before the expiration date of the effective permit.

(ii) Respondent activities

Owners and operators reapplying for a standardized permit will need to perform the following activities:

- Read the regulations;

- Prepare and submit the notice of intent.

MAINTAINING A STANDARDIZED PERMIT

(1) Making Routine Changes

(i) Data items

Sections 124.212 and 270.320 require owners and operators seeking to make routine changes (class 1 modifications under 40 CFR 270.42 Appendix I that do not require prior approval from the Director) to their standardized permits to provide the following data items:

- The revised information pursuant to section 270.267(b)(1); and
- A notice of changes to the facility mailing list and to state and local governments in accordance with the procedures in sections 124.10(c)(1)(ix) and (x).

(ii) Respondent activities

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Prepare and submit the revised information to the Director; and
- Submit the revised information to the facility mailing list and local governments.

(2) Making Routine Changes Requiring Prior Approval from the Director (124.212, 270.320(b))

(i) Data items

Section 124.213 and 270.320 require owners and operators seeking to make routine changes to their standardized permits to provide the following data items:

- The revised information pursuant to section 270.267(b)(1) requesting approval; and
- A notice of changes to the facility mailing list and to state and local governments in accordance with the procedures in sections 124.10(c)(1)(ix) and (x).

(ii) Respondent activities

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Prepare and submit the revised information to the Director requesting approval
- After approval, submit the revised information to the facility mailing list and local governments.

(3) Making Significant Changes (124.214, 270.320)

(i) Data items

Sections 124.214 and 270.320 require owners and operators seeking to make significant changes (based on the criteria specified in section 270.320(b)(1)-(3)) to their standardized permits to provide the following data items:

- A public meeting (with prior notice);
- A modification request to the Director that:
 - Describes the exact change(s) desired, and whether they are changes to information provided under section 270.275 or to terms and conditions in the supplemental portion of the standardized permit;
 - Explains why the modification is needed; and
 - Includes a summary of the public meeting described above, along with the list of attendees and their addresses and copies of any written comments or materials submitted at the meeting.

(ii) Respondent activities

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Read the regulations;
- Provide notice of and hold a public meeting; and
- Prepare and submit the modification request to the Director (after holding the public meeting).

GENERAL FACILITY STANDARDS

(1) Obtaining an Identification Number

(i) *Data items*

Section 267.12 requires owners and operators of facilities to obtain an EPA identification number.

(ii) *Respondent activities*

In order to obtain an EPA identification number, owners and operators will need to perform the following activities:

- Read the regulations; and
- Obtain, fill out, and submit an application for an EPA identification number.

(2) Waste Analysis

(i) *Data items*

Section 267.13(a) requires an owner or operator to obtain a detailed chemical and physical analysis of any hazardous waste he or she intends to treat or store. The analysis may include data, either existing or published, developed under 40 CFR part 261, as well as existing data on the hazardous waste or hazardous waste generated from similar processes.

(ii) *Respondent activities*

In order to comply with section 267.13, respondents must perform the following activities:

- Read the regulations;
- Collect data; and
- Perform waste analysis (sampling, testing).

(3) Waste Analysis Plan

(i) *Data items*

Section 267.13(b) states that an owner or operator of a hazardous waste facility must develop and follow a written waste analysis plan that describes the procedures to be used in obtaining a detailed chemical and physical analysis of the waste. The owner or operator is required to keep the waste analysis plan at the facility. If you receive wastes generated from off-site, and are eligible for a standardized permit, you also must have submitted the waste analysis plan with the Notice of Intent. At a minimum, the plan must include the following information:

- Parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;
- Test methods used to test for the parameters;
- Sampling method used to obtain a representative sample of the waste to be analyzed;
- Frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date;
- Where applicable, the methods which will be used to meet additional waste analysis requirements for specific waste management methods as specified in sections 264.17, 264.1034(d), 264.1063(d), and 264.1083

(ii) Respondent activities

To meet the requirements outlined in section 267.13(b), owners or operators must perform the following activities:

- Read the regulations;
- Collect the data required in the waste analysis plan;
- Write the waste analysis plan; and
- Maintain the plan (e.g., photocopying and filing).

If you receive wastes generated from off-site, and are eligible for a standardized permit, you submit the waste analysis plan with the Notice of Intent.

(4) Inspections

(i) Data items

Section 267.15 requires owners and operators to develop and follow a written schedule for monitoring equipment that is important in preventing, detecting, or responding to environmental or human health hazards. This schedule must be kept at the facility; and must identify the equipment and devices to be inspected, as well as the problems to be looked for. The frequency of inspections must be based on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. At a minimum, the inspection schedule must include the items and frequencies required in sections 267.174, 267.193, 267.195, 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089, where applicable.

Section 267.15(d) states that an owner or operator must record inspections conducted according to the written schedule developed pursuant to section 267.15(b) in an inspection log or summary that is to be maintained at the facility. The inspection log or summary must contain, at a minimum, the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

(ii) Respondent activities

To meet the requirements outlined in sections 267.15(b) and 267.15(d), the owner or operator must conduct the following activities:

- Read the regulations;
- Prepare the inspection schedule; and
- Record the results of inspections in the inspection log.

(5) Employee Training

(i) Data items

Section 267.16(d) requires an owner or operator to maintain copies of personnel training documents and records at the facility. These documents should include the following data items:

- Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- Written job description for each position, which includes the necessary skill, education, or other qualifications and duties of employees assigned to each position;
- Written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and
- Records that document that the training or job experience required have been given to, and completed by, facility personnel.

(ii) Respondent activities

Respondent activities associated with section 267.16 (d) include reading the regulations, collecting the data items listed above, and maintaining (e.g., photocopying and filing) the information at the facility.

(6) Ignitable, Reactive, or Incompatible Wastes

(i) Data items

Section 267.17(c) states that the owner or operator of a hazardous waste facility must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. The owner or operator of a permitted facility must document compliance with the requirements outlined in sections 267.17(a) and (b). The documentation may be based on references to published scientific or engineering literature, data from trial tests (e.g., bench scale or pilot scale tests), waste analyses (as specified in section 267.13), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.

(ii) *Respondent activities*

Respondent activities associated with section 267.17(c) include reading the regulations, collecting and documenting the data items mentioned above, and maintaining (e.g., photocopying and filing) documentation at the facility.

PREPAREDNESS AND PREVENTION

(1) Arrangements with Local Authorities

(i) *Data items*

Section 267.36(b) requires owners and operators to document any refusal on the part of local authorities to enter into an arrangement to handle emergencies.

(ii) *Respondent activities*

Respondent activities associated with section 267.36(b) include reading the regulations, documenting any refusals, and placing this documentation into the facility operating record.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(1) Contingency Plan

(i) *Data items*

Section 267.51 requires owners or operators to have a contingency plan for their facilities and section 267.53 requires the owner or operator to maintain a copy of an updated contingency plan at the facility. Section 267.52 outlines the data elements that should be included in this plan:

- A description of the actions facility personnel will take to comply with sections 267.51 and 267.56 in response to fires, explosions, or any unplanned releases of hazardous waste from the facility;
- A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services;

- An updated list of the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators;
- An updated list of all emergency equipment at the facility and the location, physical description, and capabilities of the emergency equipment. The contingency plan should also indicate where the emergency equipment will be required; and
- An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary.

Section 267.53(b) requires owner and operators to submit a copy of the contingency plan and all revisions to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Section 267.54 requires owners and operators to review and, if necessary, immediately amend the contingency plan whenever:

- The facility permit is revised;
- The plan fails in an emergency;
- The facility is changed in a way that increases the potential for an emergency or changes the response necessary in an emergency;
- The list of emergency coordinators is changed; or
- The list of emergency equipment is changed.

(ii) Respondent activities

In order to comply with contingency plan requirements, owners or operators are required to perform the following activities:

- Read the regulations;
- Collect the data required in the contingency plan;
- Write the contingency plan;
- Submit the contingency plan to State and local authorities;
- Maintain (e.g., photocopy and file) the contingency plan; and
- Amend the contingency plan when appropriate.

(2) Emergency Reporting

(i) Data items

Section 267.56(c)(1) requires owners and operators to immediately notify State and local authorities with designated response roles of an imminent or actual emergency situation.

Section 267.56(c)(2) the facility emergency coordinator to notify the on-scene coordinator or the National Response Center of any release, fire, or explosion that could threaten human health or the environment outside the facility. The emergency notification report must include the following information:

- Name and telephone number of reporter;
- Name and address of facility;
- Time and type of incident;
- Name and quantity of material(s) involved;
- The extent of injuries; and
- Possible hazards to human health or the environment outside the facility.

Section 267.58(a) states that the owner or operator should notify the Regional Administrator and appropriate State and local authorities that their facility is in compliance with section 267.57(b) before resuming operations in the affected area(s) of the facility.

Within 15 days of the incident, owners and operators are required, under section 267.58(b) to submit a written report on the incident to the Regional Administrator. The report must include the following data items:

- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident;
- Name and quantity of material(s) involved;
- The extent of any injuries;
- An assessment of actual or potential hazards to human health or the environment; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

Section 267.58(b) also requires owners and operators to note the time, date, and details of any incident that requires implementing the contingency plan in the operating record.

(ii) Respondent activities

In order to comply with the reporting requirements of section 267.58(c)(1), owners and operators must submit the required notification of an imminent or actual emergency situation to State and/or local authorities.

In order to comply with the reporting requirements of section 267.56(c)(2), owners and operators must perform the following activities:

- Notify the on-scene coordinator or the National Response Center of any release.
- Collect the information required in the emergency report; and
- Write the emergency notification report.

In order to prepare an owner/operator's emergency report under section 267.58(a), owners and operators must conduct the following activities:

- Read the regulations;
- Collect the information required in the emergency report; and
- Write the emergency report.

In addition to preparing an emergency report, the owner or operator must notify the Regional Administrator that the facility is in compliance with section 267.57(b) before resuming operations in affected areas of the facility. Respondent activities associated with this requirement include the following:

- Compiling information that demonstrates that all affected areas are in compliance; and
- Preparing a letter notifying the Regional Administrator of this compliance.

To comply with the requirements of section 267.58, owners and operators must record the details of any incident that requires implementing the contingency plan in the operating record.

RECORD KEEPING, REPORTING, AND NOTIFYING

(1) Record Keeping

(i) Data items

Section 267.71 requires owners and operators to record and maintain the following information, as it becomes available, in the facility operating record until the facility is closed:

- A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by Appendix I of part 264;
- The location of each hazardous waste within the facility and the quantity at each location;
- Records and results of waste analyses performed;
- Summary reports and details of all incidents that require implementing the contingency plan;
- Records and results of inspection reports (which must be kept for three years);
- Monitoring, testing, or analytical data and corrective action where required;
- All closure cost estimates;
- A certification by the permittee, no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable; and the proposed method of treatment, storage, or disposal that is the practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment;
- For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration required under section 268.7 or section 268.8;
- For an on-site storage facility, the information in the notice (except the manifest number), and the certification and demonstration if applicable, required under section 268.7 or section 268.8.

(ii) Respondent activities

In order to comply with section 267.71, owners or operators are required to maintain a written operating record at the facility. Respondent activities associated with maintaining an operating record include maintaining (e.g., photocopying and filing) the data items listed above.

(2) Reports

(i) Data items

Section 267.73(a) requires owners and operators to submit a single copy of a biennial report to the Regional Administrator by March 1 of each even numbered year. This requirement is covered in the The Hazardous Waste Report ICR.

Section 267.73(b) requires owners and operators to report to the Regional Administrator:

- Releases, fires, and explosions as specified in section 267.58(b);
- Facility closures specified in section 267.117; and
- As otherwise required by subparts I, J, and DD of part 267 and subparts BB and CC of part 264.

(ii) *Respondent activities*

As discussed above, the requirements at section 267.73(a) are covered under another ICR, and therefore are not burdened here. Additionally, the reports described in section 267.73(b) are burdened under the applicable sections for each individual report.

(3) Notifications

(i) *Data items*

Section 267.74 requires that, before transferring ownership or operation of a facility during its operating life, an owner or operator must notify the new owner or operator in writing of the requirements of parts 267 and 270.

(ii) *Respondent activities*

In order to meet the requirement described above, owners and operators must prepare a written notification informing the new owner or operator of the requirements of parts 267 and 270.

CLOSURE

(1) Closure Plan

(i) *Data items*

Owners and operators are required by section 267.112 to submit a written closure plan with the Notice of Intent. The plan must identify steps necessary to perform partial and/or final closure of the facility, and must include at least the following items:

- A description of how each hazardous waste management unit at the facility will be closed in accordance with section 267.111;

- A description of how final closure of the facility will be conducted in accordance with section 267.111. The description must identify the maximum extent of operations which will be unclosed during the active life of the facility;
- An estimate of the maximum inventory of hazardous wastes ever on-site over the active life of the facility. This should include a detailed description of the methods to be used during partial closures and final closure such as methods for removing, transporting, treating, storing, or disposing of all hazardous wastes, and identification of the type(s) of off-site hazardous waste management units to be used, if applicable;
- A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure;
- A detailed description of other activities necessary during the closure period to ensure that all partial closures and final closure satisfy the closure performance standards; and
- A schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include, at a minimum:
 - The total time required to close each hazardous waste management unit; and
 - The time required for intervening closure activities which will allow tracking of the progress of partial and final closure.

(ii) Respondent activities

The respondent activities associated with the closure plan described above include:

- Reading the regulations;
- Conducting an inventory of the hazardous waste present;
- Recording results of inventory; Writing descriptions for the necessary activities;
- Estimating final closure; and
- Writing the closure schedule.

(2) Notification Before Partial Closure and Final Closure

(i) Data items

Section 267.112(c) requires owners and operators to notify the Director in writing at least 45 days before beginning final closure of a treatment or storage tank, container storage, or containment building.

(ii) Respondent activities

To meet the above requirement, respondents must read the regulations, and prepare a written notification.

(3) Certification of Closure

(i) Data items

Section 267.117 requires owners and operators to submit to the Director a certification of closure within 60 days of the completion of final closure of each unit under a part 270 subpart J standardized permit. This certification must be sent by registered mail; must certify that each hazardous waste management unit or facility has been closed following the specifications in the closure plan; and must be signed by the owner or operator and an independent registered engineer.

(ii) Respondent activities

The respondent activities associated with the certification of closure include:

- Reading the regulations;
- Preparing the certification; and
- Submitting the certification.

FINANCIAL REQUIREMENTS

(1) Cost Estimate for Closure

(i) Data items

Section 267.142(a) requires owners and operators to develop a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in sections 267.111 through 267.115 and applicable closure requirements in sections 267.178, 267.197, 267.1102. Section 267.142(b) specifies that this estimate must be updated annually for inflation. Section 267.142(c) specifies that owners and operators must keep the latest closure cost estimate (adjusted to the current year) at the facility.

(ii) Respondent activities

The requirements described above will entail the following activities:

- Reading the regulations;
- Preparing a detailed estimate of closure costs;
- Updating the estimate for inflation annually; and
- Maintaining the estimate at the facility.

(2) Closure Trust Fund

(i) Data items

Section 267.143(a) explains that owners and operators may use a closure trust fund to meet the financial assurance requirements of section 267.143. Data items for this mechanism include:

- A trust agreement in compliance with sections 264.143(a)(1) and (2), and 264.143(a)(6)-(11). The wording of this agreement must follow the wording specified in section 264.151(a)(1);
- For new facilities, a receipt from the trustee must be submitted to the Regional Administrator prior to the initial storage of waste;

(ii) Respondent activities

Owners and operators establishing a trust fund to meet the financial assurance requirements for closure will perform the following activities:

- Reading the regulations;
- Establishing a closure trust fund;
- Submitting an originally signed duplicate of the trust agreement to the EPA Regional Administrator;
- For owners and operators of new facilities, submitting a receipt for the first payment under the trust agreement before the initial receipt of hazardous wastes.

(3) Surety Bond Guaranteeing Payment into a Closure Trust Fund

(i) Data items

Section 267.143(b) allows owners and operators to meet the financial assurance requirements for closure by obtaining a surety bond guaranteeing payment into a closure trust fund. The data items associated with this mechanism are:

- A surety bond instrument, as specified at section 264.151(b); and
- A standby trust agreement, as specified at section 264.143(b)(3).

(ii) Respondent activities

In collecting these data items, owners and operators will need to engage in the following respondent activities:

- Reading the regulations;
- Establishing a surety bond and trust agreement that comply with the financial assurance requirements of section 267.143(b); and
- Submitting originally signed duplicates of the surety bond and trust agreement to the Regional Administrator.

(4) Surety Bond Guaranteeing Performance of Closure

(i) Data items

Section 267.143(c) allows owners and operators to meet the financial assurance requirements for closure by obtaining a surety bond guaranteeing the performance of closure. The data items for this instrument include:

- A surety bond instrument specified at section 264.151(c); and
- A standby trust agreement, as specified at section 264.143(c)(3).

(ii) Respondent activities

The respondent activities associated with this financial assurance instrument include:

- Reading the regulations;
- Obtaining a surety bond and trust agreement that comply with the financial assurance requirements of section 267.143(c); and
- Submitting originally signed duplicates of the surety bond and trust agreement to the Regional Administrator.

(5) Closure Letter of Credit

(i) Data items

Section 267.143(d) specifies that owners or operators may obtain an irrevocable standby letter of credit in order to satisfy financial assurance requirements for closure. Data items for this information collection include:

- A letter of credit from an issuing institution authorized to issue letters of credit and whose letter-of-credit operations are regulated and examined by a Federal or State agency; and
- A trust agreement indicating the conditions of payment into the standby trust fund specified in section 264.143(d)(3).

(ii) Respondent activities

Owners or operators will need to engage in the following activities in order to satisfy the financial assurance requirements with a closure letter of credit:

- Reading the regulations;
- Obtaining a letter of credit from an issuing institution and establishing the stand-by trust fund; and
- The letter of credit and an originally signed duplicate of the trust agreement to the Regional Administrator.

(6) Closure Insurance

(i) Data items

Owners or operators may satisfy the financial assurance requirements for closure by establishing closure insurance according to section 267.143(e). The data item for this information collection is a closure insurance policy (identified by a certificate of insurance) that meets the requirements specified in section 264.143(e).

(ii) Respondent activities

The following activities are necessary to meet the above requirement:

- Reading the regulations;
- Obtaining a closure or post-closure insurance policy that satisfies the requirements of section 264.143(e); and
- Submitting a certificate of this insurance policy to the Regional Administrator.
- **Corporate Financial Test and Corporate Guarantee**

(i) Data items

Section 267.143(f) allows owners and operators to satisfy closure financial assurance requirements by demonstrating financial strength using the financial test specified in this section. Data items for this demonstration include:

- A letter signed by the owner's or operator's chief financial officer as specified in section 267.143(f)(2)(i)(A);
- A copy of an independent certified public accountant's report on examination of the owner's or operator's financial statements for the latest completed fiscal year;
- A special report from the owner's or operator's independent certified public accountant to the owner or operator covering the specifications outlined in sections 267.143(f)(2)(i)(c) and (d);
- Annual updates of the above data items;
- A notice of intent to establish alternative financial assurance, if the owner or operator fails the financial test and no longer meets the requirements of section 267.143(f)(1);
- Reports of financial conditions as required by the Regional Administrator under section 267.143(f)(2)(v)(A); and
- If applicable, a written guarantee from the parent corporation of the owner or operator that satisfies the requirements at section 267.143(g)(1).

(ii) Respondent activities

Owners and operators will need to perform the following activities to provide the data items listed above:

- Reading the regulations;
- Writing the letter signed by the chief financial officer;
- Submitting the following documents to the Regional Administrator (for new facilities, these documents must be submitted at least sixty days prior to placing waste in the facility):
 - The letter signed by the chief financial officer;
 - A copy of the independent certified public accountant's report; and
 - The special report from the independent certified public accountant;
- Submitting updated information annually;

- If applicable, writing and submitting a notice, by certified mail, to the Regional Administrator of intent to establish other financial assurance; and
- Writing and submitting additional reports of financial condition at any time, as directed by the Regional Administrator; and
- If applicable, submitting the corporate guarantee from the parent corporation of the owner or operator.

(8) Use of a Financial Assurance Instrument for Multiple Facilities

(i) Data items

Section 267.143(i) allows owners and operators to use a single financial mechanism for multiple facilities, as specified in section 264.143(h). In such cases, the owner and operator must provide the following data items for each facility:

- EPA identification number, name, and address; and
- The amount of funds for closure or post-closure care assured by the mechanism.

(ii) Respondent activities

In order to provide the data items listed above, owners and operators will need to perform the following activities:

- Reading the regulations;
- Submitting the data items listed above to the Regional Administrator; and
- If the facilities covered by the mechanism are located in more than one Region, submitting identical evidence of financial assurance to all the applicable Regional Administrators.

(9) Trust Fund for Liability Coverage

(i) Data items

Section 267.147(a)(3) allows owners or operators to satisfy financial requirements for liability by establishing a trust agreement that conforms to the requirements specified in section 264.147(j).

(ii) Respondent activities

Owners or operators using this option to satisfy financial assurance for liability will need to engage in the following activities:

- Reading the regulations;
- Establishing the trust fund described above; and
- Submitting an originally signed duplicate of the trust agreement to the Regional Administrator.

(10) Surety Bond for Liability Coverage

(i) Data items

Section 267.147(a)(2) allows owners or operators to satisfy financial requirements for liability. The owner/operator must obtain a surety bond (and other information, where applicable) that conforms to the requirements specified in section 264.147(i).

(ii) Respondent activities

Owners or operators using this option to satisfy financial assurance for liability will need to engage in the following activities:

- Reading the regulations;
- Obtaining the surety bond described above; and
- Submitting a copy of this surety bond to the Regional Administrator.

(11) Letter of Credit for Liability Coverage

(i) Data items

Section 267.147(a)(3) allows owners or operators to satisfy financial requirements for liability by obtaining an irrevocable standby letter of credit that conforms to the requirements of section 264.147(h).

(ii) Respondent activities

Owners or operators using this option to satisfy financial assurance for liability will need to engage in the following activities:

- Reading the regulations;
- Obtaining the standby letter of credit described above; and

- Submitting a copy of this letter of credit to the Regional Administrator.

(12) Liability Insurance

(i) Data items

Section 267.147 allows owners or operators to satisfy financial requirements for liability by obtaining liability insurance that conforms to the requirements of section 264.147(h). The following data items are required:

- A duplicate of the endorsement or certificate of insurance; and
- A duplicate of the insurance policy, if requested by the Regional Administrator.

(ii) Respondent activities

Owners or operators will need to engage in the following activities to complete the requirements for this option:

- Reading the regulations;
- Obtaining an insurance policy amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance and meeting other specifications outlined in sections 264.147(a)(1) and 264.147(b)(1);
- Submitting a signed duplicate original of the endorsement or the certificate of insurance to the Regional Administrator, or Regional Administrators if the facilities are located in more than one Region; and
- If requested by the Regional Administrator, submitting a signed duplicate original of the insurance policy (for new facilities this must be submitted at least sixty days before receiving hazardous waste for treatment or storage).

(13) Financial Test for Liability Coverage

(i) Data items

Section 267.147(a)(5) allows owners or operators to satisfy liability requirements by passing a financial test, as specified at section 267.147(f). Data items for this option include:

- A letter signed by the owner's or operator's chief financial officer and worded as specified in section 264.151(g); if the financial test is also being used to demonstrate closure financial assurance, the letter specified in section 264.151(g) must be submitted to cover both forms of financial responsibility;

- A copy of an independent certified public accountant's report on examination of the owner's or operator's financial statements for the latest completed fiscal year;
- A special report from the owner's or operator's independent certified public accountant to the owner or operator covering the specifications of section 267.147(f)(2)(i)(C);
- Annual updates of the above data items; and
- Should the owner or operator fail the test and no longer meet the requirements of section 267.147(f)(1), evidence of alternate financial assurance obtained for the entire amount of required liability coverage specified in section 267.147.

(ii) Respondent activities

Owners or operators will need to engage in the following respondent activities in order to collect the data required by these sections:

- Reading the regulations;
- Writing the letter signed by the chief financial officer;
- Submitting the following documents to the Regional Administrator (for new facilities, these documents must be submitted at least sixty days prior to receiving hazardous waste for treatment or storage):
 - The letter signed by the chief financial officer;
 - A copy of an independent certified public accountant's report; and
 - The special report from an independent certified public accountant;
- Submitting updated information annually; and
- Should the owner or operator fail the test and no longer meet section 267.147 requirements, submitting evidence to the Regional Administrator of alternate financial assurance for the entire amount of required liability coverage specified in this section.

(14) Corporate Guarantee for Liability Coverage

(i) Data items

Section 267.147(g) allows owners or operators to meet liability requirements by obtaining a written guarantee, under the conditions specified in section 267.147(g)(2). Data items for this option include:

- A certified copy of a written guarantee from the direct or higher-tier parent corporation of the owner or operator, a firm whose parent corporation is the parent corporation of the owner or operator, or a firm with a "substantial business relationship" with the owner or operator;
- In the case of corporations incorporated in the United States, a written statement from applicable Attorney(s) General or Insurance Commissioners to EPA indicating that a guarantee executed as described in the regulations is a legally valid and enforceable obligation in that State;
- In the case of corporations incorporated outside the United States, identification by the non-U.S. corporation of a registered agent for service of process in each State in which the facility covered by the guarantee is located and in the State in which it has its principal place of business, and a written statement from applicable Attorney(s) General or Insurance Commissioner of each applicable State indicating that a guarantee executed as described in the regulations is a legally valid and enforceable obligation in that State; and
- A letter from the guarantor's chief financial officer as specified in section 267.147(f)(2)(A) that demonstrates that the guarantor has passed the financial test.

(ii) Respondent activities

Owners or operators will need to engage in the following respondent activities in order to collect the data required by these sections:

- Reading the regulations;
- Obtaining a written guarantee from the direct or higher-tier parent corporation of the owner or operator, a firm whose parent corporation is the parent corporation of the owner or operator, or a firm with a "substantial business relationship" with the owner or operator;
- Submitting a certified copy of this written guarantee to the Regional Administrator along with the items specified in section 267.147(f)(2); and
- Submitting a letter from the guarantor's chief financial officer as specified in section 264.147(f)(2)(i)(A) that demonstrates that the guarantor has passed the financial test.

(15) Incapacity of Owners or Operators, Guarantors, or Financial Institutions

(i) Data items

Section 267.148 requires owners or operators to submit a notification of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S.

Code, naming the owner or operator as debtor (if the guarantor is named as the debtor, the collection of this data is the guarantor's responsibility).

(ii) Respondent activities

Activities for this data collection will include:

- Reading the regulations; and
- Submitting, by certified mail, a notice to the Regional Administrator indicating the commencement of bankruptcy proceedings in which the owner or operator or guarantor is named as debtor.

(16) State Assumption of Responsibility

(i) Data items

Section 267.150 requires owners or operators to notify EPA when a State assumes legal responsibility or assures availability of funds for an owner's or operator's compliance with the closure, post-closure care, or liability requirements of this part. Data items to be collected in this case include:

- A letter from the owner or operator requesting that the State's assumption of responsibility be considered acceptable for meeting the requirements of this subpart;
- A letter from the State describing the nature of the State's assumption of responsibility, including the following information:
 - The facility's EPA identification number, name, and address; and
 - The amount of funds for closure or post-closure care or liability coverage that are guaranteed by the State; and
- Any additional information which the Regional Administrator deems necessary to make the determination whether the State's assumption of responsibility is acceptable.

(ii) Respondent activities

Activities for this data collection will include:

- Reading the regulations; and
- Submitting to the Regional Administrator:
 - The letter from the owner or operator; and

- The letter from the State describing the State's assumption of responsibility and including the information specified above; and
- Submitting any additional information requested by the Regional Administrator.

USE AND MANAGEMENT OF CONTAINERS

(i) Data items

Section 267.172 requires owners and operators of facilities that store or treat hazardous waste in containers to inspect areas where they store containers, at least weekly.

(ii) Respondent activities

In order to provide the above data item, owners and operators will need to perform the following activities:

- Read the regulations;
- Inspect the areas where they store containers, at least weekly (section 267.172); and
- Record the results of the inspection (section 267.15(d)).

In addition, section 267.177 requires owners and operators to manage all hazardous waste placed in containers according to the air emission requirements established in subparts BB and CC of part 264. These requirements, however, are not addressed in this ICR since they are already covered in the *Hazardous Waste Specific Unit Requirements, and Special Waste Processes and Types ICR* and in the *Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC ICR*.

TANK SYSTEMS

(1) Applicability

(i) Data items

Section 267.190 allows owners and operators to exempt their facilities from the secondary containment requirements in section 267.195 if they can demonstrate that their tank systems do not contain free liquids and are situated inside a building with an impermeable floor. To obtain this exemption, owners and operators must demonstrate the absence or presence of free liquids in the stored/treated waste, using Method 9095 (Paint Filter Liquids Test) as described in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA Publication SW-846.

(ii) Respondent activities

Respondent activities associated with the above data item include:

- Reading the regulations; and
- Preparing the no free liquids demonstration.

(2) Design and Construction Standards

(i) Data items

Section 267.191 requires owners and operators to obtain a written assessment, reviewed and certified by an independent, qualified registered professional engineer, following section 270.11(d), attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste. This assessment must include at least the following information:

- Design standard(s) for the construction of tank(s) and/or the ancillary equipment;
- Hazardous characteristics of the waste(s) to be handled;
- Factors affecting the potential for corrosion and the type and degree of external corrosion protection needed to ensure the integrity of the tank system; and
- Design considerations to ensure that the tank foundations will maintain the load of a full tank, will be anchored to prevent flotation or dislodgement, and will withstand the effects of frost heave.

(ii) Respondent activities

In order to provide the data items described above, owners and operators will need to perform the following activities:

- Read the regulations; and
- Obtain a written assessment from an independent, qualified registered professional engineer.

(3) Installation Requirements

(i) Data items

Section 267.194 requires owners and operators to obtain, and keep at the facility, written statements by those persons required to certify the design of the tank system and to supervise the installation of the tank system as required in sections 267.192, 267.193, and 267.194(a) and (b).

(ii) Respondent activities

In order to provide the data items described above, owners and operators will need to perform the following activities:

- Reading the regulations;
- Obtaining the written statements; and
- Maintaining the statements at the facility.

(4) Inspection Requirements

(i) Data items

Section 267.199 requires owners and operators to provide the following data items:

- A schedule and procedure for inspecting overfill controls; and
- The results of inspections carried out pursuant to 267.199(a)-(c).

(ii) Respondent activities

In order to comply with section 267.199 requirements, owners and operators must perform the following activities:

- Reading the regulations;
- Developing and follow a schedule and procedure for inspecting overfill controls;
- Inspecting the following at least once each operating day:
 - Aboveground portions of the tank system to detect corrosion or releases of waste;
 - Data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design; and
 - The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system to detect erosion or signs of releases of hazardous waste;
- Inspecting cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:
 - Confirm that the cathodic protection system is operating properly within six months after initial installation and annually thereafter;

- Inspect and/or test all sources of impressed current, as appropriate, at least every other month; and
- Documenting in the facility operating record the results of the above required inspections.

(5) Leaks and Spills

(i) Data items

Section 267.200 requires owners and operators to provide the following data items if there has been a leak or spill from a tank system or secondary containment system, or if either system is unfit for use:

- A report informing the Regional Administrator of the release within 24 hours of its detection; and
- A report to the Regional Administrator, within 30 days of detection, containing the following information:
 - The likely route of migration of the release;
 - The characteristics of the surrounding soil;
 - The results of any monitoring or sampling conducted in connection with the release;
 - The proximity to downgradient drinking water, surface water, and populated areas; and
 - A description of response actions taken or planned.

Section 267.200(f) requires owners and operators who have made extensive repairs to a tank system in accordance with section 267.200(e) to obtain and submit a certification from an independent, qualified, registered, professional engineer that the repaired system is capable of handling hazardous waste without release for the intended life of the system.

(ii) Respondent activities

The data items above will require the following respondent activities:

- Reading the regulations;
- Preparing and submitting a report to the Regional Administrator within 24 hours of leak detection;

- Preparing and submitting a report to the Regional Administrator within 30 days of leak detection; and
- Obtaining and submitting an engineer's certification.

In addition, section 267.204 requires owners and operators to manage all hazardous waste placed in a tank according to the air emission requirements established in subparts BB and CC of part 264. These requirements, however, are not addressed in this ICR since they are already covered in the *Hazardous Waste Specific Unit Requirements, and Special Waste Processes and Types ICR* and in the *Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC ICR*.

CONTAINMENT BUILDINGS

(1) Additional Standards for Liquid Storage

(i) Data items

Section 267.1103(d) requires owners and operators to inspect and record in the facility's operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment as well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste.

(ii) Respondent activities

In order to provide the above data items, owners and operators will have to perform the following activities:

- Read the regulations;
- Inspect data at least once every seven days; and
- Record the results in the facility's operating record.

(2) Waiver from Secondary Containment Requirements

(i) Data items

Section 267.1104 allows owners and operators to obtain a waiver from secondary containment requirements by demonstrating that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements.

(ii) Respondent activities

Owners and operators wishing to waive the secondary containment requirements must perform the following activities:

- Reading the regulations; and
- Preparing the demonstration.

(3) Containment Buildings with Areas Both with and Without Secondary Containment

(i) Data items

Section 267.1105 requires owners and operators of containment buildings that have areas both with and without secondary containment to maintain in the facility's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment.

(ii) Respondent activities

Respondent activities associated with the above data items include:

- Reading the regulations; and
- Preparing and maintaining a written description of the operating procedures.

(4) Releases of Hazardous Waste

(i) Data items

Section 267.1106 requires owners and operators that detect a condition that could lead to or has caused a release of hazardous waste to provide the following:

- A record of the discovery in the facility operating record;
- A notification to the Director of the condition;
- A written notice to the Director with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work; and
- Upon completion of all repairs and cleanup, a written notification to the Director providing verification, signed by a qualified, registered, professional engineer, that the repairs and cleanup have been completed according to the written plan described above.

(ii) Respondent activities

In order to provide the above data items, owners and operators will need to perform the following activities:

- Reading the regulations;
- Entering a record of the discovery in the operating record;
- Preparing and submitting a notification to the Director within 7 days of the discovery;
- Preparing and submitting the written notice to the Director within 14 working days of the discovery; and
- Preparing and submitting the written verification to the Director.

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

The following section discusses how EPA and implementing agencies would collect and manage the information received from respondents. This section also includes a discussion of how EPA would take steps to ensure that the information collections are not overly burdensome on small entities.

5(a) Agency Activities

APPLYING FOR A STANDARDIZED PERMIT

Agency activities associated with a standardized permit application and renewal include reviewing the incoming notice of intent and supporting information, determining whether the facility is eligible for the standardized permit, and entering the information into a database.

MAINTAINING A STANDARDIZED PERMIT

(1) Routine Changes

Agency activities associated with routine changes to a standardized permit include reviewing the information submitted by the permit holder.

(2) Routine Changes with Prior Approval of the Director

Agency activities associated with routine changes to a standardized permit include reviewing the information submitted by the permit holder, and approving/disapproving the request.

(3) Significant Changes

Agency activities associated with significant changes to a standardized permit include reviewing the incoming modification request and supporting information, reviewing the proof of public notice, and entering the information into a database.

GENERAL FACILITY STANDARDS

Agency activities associated with general facility standards requirements include:

- Issuing an identification number to new facilities, and entering the facility in the hazardous waste facility data system.
- During inspection of the facility, reviewing the security procedures and determining if the components of the security system are in place and in working order.
- Reviewing information submitted by permit holders seeking for a waiver from security requirements, and deciding whether to grant the request.
- Reviewing demonstration of compliance with location factors submitted by permit holders.
- Reviewing information submitted by permit holders seeking for a waiver from location standards.

PREPAREDNESS AND PREVENTION

Although the information is not formally submitted to the permitting agency, the permitting agency may review documentation on any refusal on the part of local authorities to enter into an arrangement to handle emergencies.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Agency activities associated with the development and amendment of the contingency plan include: reviewing the contingency plan during on-site inspections and reviewing revisions to the contingency plan.

Agency activities associated with emergency reporting requirements include reviewing documents in the owners' or operators' and emergency coordinators' emergency reports.

RECORD KEEPING, REPORTING, AND NOTIFYING

Only one Agency activity is associated with the operating record requirements: on-site review of the record.

CLOSURE

Agency activities associated with closure include reviewing closure plans, closure plan amendment notifications, partial/final closure notifications, and closure certifications. In addition, the permitting agency must issue a public notice for comments on the closure plan and make a determination whether to approve, modify, or disapprove the closure plan.

FINANCIAL REQUIREMENTS

Agency activities pertaining to financial requirements include:

- Reviewing closure cost estimates, demonstrations of financial assurance for closure, and demonstrations of financial assurance for liability.
- Entering the information into the RCRAInfo database.

USE AND MANAGEMENT OF CONTAINERS

Although the information is not formally submitted to the permitting agency, the permitting agency may review inspection records during site inspections.

TANK SYSTEMS

Agency activities pertaining to tank systems requirements include reviewing notifications and detailed reports on any releases to the environment. In addition, the permitting agency may review inspection records during site inspections.

CONTAINMENT BUILDINGS

Agency activities pertaining to tank systems requirements include reviewing notifications on any releases to the environment and documentation submitted to support requests for secondary containment requirements waivers. In addition, the permitting agency may review inspection records during site inspections.

5(b) Collection Methodology and Management

The permitting agency will receive and keep records of the notifications and supporting documentation submitted by facility owners and operators applying for, renewing, or modifying a standardized permit. The permitting agency will also collect and keep records of closure plans and closure certifications submitted by facilities operating under a standardized permit. In collecting and reviewing this information, the permitting agency would use state-of-the-art electronic equipment such as personal computers and applicable data software, when appropriate.

5(c) Small Entity Flexibility

The standardized permit provides regulatory relief from parts of RCRA hazardous waste permitting program for facilities with tanks, containers, and containment buildings that apply and obtain a standardized permit. Thus, small facilities, among others, would see relief. In addition, the final regulations would allow these facilities to maintain most information in facility records rather than in submittals to EPA, thus reducing time and costs for providing information. Since small facilities conduct operations that are equally as hazardous to the environment as those conducted by larger facilities, EPA determined that small businesses should be required to comply with the same regulations as large businesses. As a result of this interpretation, no specific requirements are outlined for smaller facilities.

5(d) Collection Schedule

Under section 124.204, the permitting agency is required to collect, review, and keep records of notices of intent and supporting information submitted by facility owners and operators applying for standardized permits. This information is used to determine whether a facility is or is not eligible to operate under a standardized permit. Once the permitting agency makes the preliminary decision to either grant or deny coverage under the standardized permit, section 124.207 requires the permitting agency to provide public notice of the draft permit decision, including any proposed site-specific conditions in a supplemental portion, and to provide an opportunity for the public to submit comments and request a hearing on that decision. The public notice issued by the permitting agency must allow at least 45 days for people to submit written comments on the draft permit decision (section 124.208(a)). Information collected during the public comment period is considered when making a final determination on whether to grant or deny coverage to a facility to operate under the standardized permit. If coverage is granted, the permitting agency considers the public comments when specifying terms and conditions in the supplemental portion of the standardized permit, if any.

Under section 267.112, facility owners and operators must submit a written closure plan with the Notice of Intent. Once the permitting agency receives this information, it must review and approve the closure plan. In addition, the permitting agency must provide the public an opportunity to comment on the plan. The comment period will be open for 30 days. The permitting agency will also, in response to a request or at its own discretion, hold a public hearing whenever such a hearing might clarify one or more issues concerning the closure plan. After review of the public comments, the permitting agency will approve, modify, or disapprove the plan. If the permitting agency does not approve the closure plan, it must provide the facility owner or operator with a detailed written statement of reasons for the refusal. The permitting agency then will approve or modify the new closure plan. Once closure is completed, the permitting agency must collect and review a certification submitted by the facility owner or operator stating that each hazardous waste management unit or facility, as applicable, has been closed following the specifications in the closure plan.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA estimated respondent burden associated with all of the requirements covered in this ICR in Exhibits 1 through 9. The exhibits estimate the number of hours required to conduct each individual information collection activity and the cost associated with that activity.

6(b) Estimating Respondent Costs

Labor Costs

EPA estimates an average hourly respondent labor cost (including overhead) of \$104.18 for legal staff, \$84.86 for managerial staff, \$40.68 for technical staff, and \$22.73 for clerical staff. These wage rates are based on actual Bureau of Labor Statistics (BLS) mean rates, plus overhead and fringe benefits. These rates are lower than those previously used. Previous estimates reflected updates with a straight inflation factor applied to previous respondent hourly estimates.

Capital Costs

EPA estimates that only new facilities will incur capital costs associated with purchasing file storage systems for maintaining records. EPA realizes that facilities will likely use different and various file storage systems (e.g., file cabinets, CD-ROM, off-site storage, etc) and store their files on different media (paper, microfiche, electronic files, etc). For purposes of estimating these capital costs across all facilities, EPA has made the conservative assumption that every new facility will store their files in paper form in file cabinets.

EPA estimates that each new facility will need to purchase one 5-drawer lateral file cabinet to maintain their application materials over the ten-year life of their permit.¹ The current market price for such a file cabinet is \$549. EPA has annualized this cost at a discount rate of 7 percent over ten years (based on the average life of the permit). Thus, EPA estimates the annualized net present value of this capital cost to be \$78 per facility. In Exhibit 19, EPA has included the annualized capital cost for the two new facilities expected to apply for and obtain a standardized permit each year (\$156 per year).

Operation and Maintenance Costs

EPA estimates that respondents may incur annual operations and maintenance costs associated with the information collection requirements. EPA estimates that sending a notification to EPA under sections 124.202, 270.275, 270.280, and 270.285 would cost about \$4.00 for the mailing expense (e.g., for certified mail with return receipt).

In this ICR, EPA also estimates costs to respondents for obtaining contractor-related services, such as preparing compliance demonstrations for containers and tank systems.

6(c) Estimating Agency Burden and Costs

¹ EPA assumes existing permitted and interim-status facilities have already compiled much of the materials required in the standardized permit application; and thus, they have already purchased the file cabinets needed.

EPA estimates Agency burden hours and costs associated with all the requirements covered in this ICR in Exhibit 20. EPA estimates an average hourly Agency labor cost of \$76.38 for Regional legal staff, \$54.94 for Regional managerial staff, \$38.56 for Regional technical staff, and \$23.44 for Regional clerical staff. EPA used the 2012 Federal Pay Schedule salary figures to estimate annual compensation of Regional legal, managerial, technical, and clerical staff. For purposes of this ICR, EPA assigned Regional staff the following government service levels:

Legal staff	GS-15, Step 1
Managerial staff	GS-13, Step 1
Technical staff	GS-11, Step 1
Clerical staff	GS-06, Step 1

EPA divided annual compensation estimates by 2,080, the number of hours in a Federal work year, and multiplied the rates by the standard government overhead factor of 1.6 to derive hourly rates.

6(d) Estimating the Respondent Universe and Total Burden and Cost

Estimated Universe

The original ICR for the standardized permit rule included estimate for the number of eligible facilities, and for facilities expected to apply for the standardized permit. Since the rule was promulgated in 2005, six states have received authorization for the rule (ID, MT, NV, OK, TX, and VA) and only one facility has been issued a standardized permit.

For this renewal we are revising our estimate of the number of facilities eligible for the standardized permit rule. The estimate is derived from the RCRAInfo data system, and considers only facilities located in states currently authorized for the standardized permit rule, and those states where EPA is the implementing agency. The criteria for the estimate include: permitted hazardous waste facilities currently operating container storage areas, tanks, or containment buildings, and that either manage the wastes they generate or manage wastes received from off-site from facilities under the same ownership. Based on these criteria, we estimate that 86 facilities are eligible for the standardized permit rule.

Respondent Burden and Costs

Based on this universe, EPA estimated respondent burden and costs associated with all of the requirements covered in this ICR in Exhibits 1 through 9. A discussion of the burden estimates presented in these exhibits follows.

APPLYING FOR A STANDARDIZED PERMIT

(1) General Information Requirements

EPA estimates that a total of 86 (permitted, interim status, and new) TSDFs per year will apply for a standardized permit. All of these facilities are expected to read the regulations and submit a written notice of intent to operate under a standardized permit, a public meeting summary, and a certification of compliance with part 267.

EPA assumes that all of these facilities already have collected most of the required information as part of their previous permitting process (e.g., Part A information, documentation of compliance with location standards, waste management unit information). Permitted facilities will only need to collect those data items not already required at part 264 or 270, e.g., notice of intent to operate under a standardized permit.

EPA assumes that interim status and new facilities (i.e., a total of 86 facilities per year) will have to prepare and maintain all general information, with two exceptions. One exception pertains to submitting the Part A application. EPA assumes that only new facilities will incur burden for this activity, since interim status facilities should already have submitted this information to EPA.

The other exception pertains to compliance schedules. EPA assumes that 5 percent of the facilities will not be in compliance with general information requirements of part 264 or 265. The 5-percent estimate is based on EPA's experience under the RCRA program. These facilities would have to prepare and submit a schedule of compliance with part 267 as part of their standardized permit application.

(2) Record Keeping Requirements

With few exceptions, EPA assumes that only interim-status and new facilities will have to incur burden for record keeping information. The exceptions pertain to the record keeping of particular data items. Specifically, EPA assumes that only new facilities will incur burden for preparing a general description of the facility and obtaining a topographic map. EPA also assumes that 5 percent will have to prepare a justification for modifications of the preparedness and prevention requirement. Again, these estimates are based on EPA's experience under the RCRA program.

(3) Container Information Requirements

EPA assumes permitted facilities will not incur burden in compiling information on their containers, but that interim status and new facilities will need to collect information on containers, under section 270.300.

(4) Tank Information Requirements

EPA assumes permitted facilities will not incur burden in compiling information on their tanks, but that interim status and new facilities will need to collect information on tanks, under section 270.305.

(5) Equipment Information Requirements

EPA assumes permitted and interim status facilities will not incur burden in compiling information on their equipment. All permitted and interim status facilities are already required to have this information under 40 CFR part 270. However, EPA assumes that the one new facility owning tank systems will be subject to the equipment standards.

(6) Air Emissions Control Requirements

EPA assumes permitted and interim status facilities will not incur burden in compiling information on their air emission controls. All permitted and interim status facilities are already required to have this information under 40 CFR part 270. However, EPA assumes that the two new facilities will be subject to the air emission control standards.

(7) Switching from an Individual RCRA Permit to a Standardized Permit

For permitted facilities switching to a standardized permit prior to permit renewal, EPA has added the burden of reading the regulations and preparing and submitting a request to the permitting agency.

(8) Reapplying for a Standardized Permit

For the purposes of this ICR, EPA assumes that no facilities will be reapplying for a standardized permit during the three-year period of this ICR.

MAINTAINING A STANDARDIZED PERMIT

EPA estimates that approximately 10 percent of the TSDFs operating under a standardized permit will have to make routine changes to their permits each year.

GENERAL FACILITY STANDARDS

Information collection requirements pertaining to general facility standards are already covered in the *General Hazardous Waste Facility Standards ICR* and the *Part B Permit Application, Permit Modifications, and Special Permits ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

PREPAREDNESS AND PREVENTION

Information collection requirements pertaining to preparedness and prevention are already covered in the *General Hazardous Waste Facility Standards ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new

facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICR.)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Information collection requirements pertaining to the contingency plan and emergency procedures are already covered in the *General Hazardous Waste Facility Standards ICR* and the *Part B Permit Application, Permit Modifications, and Special Permits ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

RECORD KEEPING, REPORTING, AND NOTIFYING

Information collection requirements pertaining to record keeping and reporting are already covered in the *General Hazardous Waste Facility Standards ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICR.)

CLOSURE

Information collection requirements pertaining to closure are already covered in the *General Hazardous Waste Facility Standards ICR* and the *Part B Permit Application, Permit Modifications, and Special Permits ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

FINANCIAL REQUIREMENTS

Information collection requirements pertaining to financial assurance are already covered in the *General Hazardous Waste Facility Standards ICR* and the *Part B Permit Application, Permit Modifications, and Special Permits ICR*. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

USE AND MANAGEMENT OF CONTAINERS

Information collection requirements pertaining to the use and management of containers are already covered in the *Part B Permit Application, Permit Modifications, and Special Permits ICR*, the *Hazardous Waste Specific Unit Requirements*, and *Special Waste Processes and Types ICR*, and the *Standards of Performance for Air Emission Standards for Tanks, Surface*

Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC ICR. Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

TANK SYSTEMS

Information collection requirements pertaining to tank systems are already covered in the *Part B Permit Application, Permit Modifications, and Special Permits ICR*, the *Hazardous Waste Specific Unit Requirements, and Special Waste Processes and Types ICR*, and the *Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers, 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC ICR.* Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICRs.)

CONTAINMENT BUILDINGS

Information collection requirements pertaining to containment buildings are already covered in the *Hazardous Waste Specific Unit Requirements, and Special Waste Processes and Types ICR.* Thus, EPA has chosen not to burden TSDFs applying for and obtaining a standardized permit with these requirements in this ICR, i.e., the number of respondents or activities is equal to zero. (Note that the two new facilities expected to apply for and obtain a standardized permit are covered in the above mentioned ICR.)

6(e) Bottom Line Burden Hours and Costs

Respondent Tally

Exhibit 19 summarizes the total annual respondent burden and cost associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates that the annual respondent burden to be approximately 13,948 hours, at an annual cost of \$1,220,213.

Agency Tally

Exhibit 20 summarizes the estimated Agency burden associated with all activities covered in this ICR. As shown in the exhibit, EPA estimates that the annual agency burden is approximately 5,489 hours, at an annual cost of \$295,680.

6(f) Reasons for Change in Burden

There is an decrease of 1,097 hours in the annual burden of this ICR. The reason is due to a decrease in the respondent universe from 184 to 86.

6(g) Burden Statement

The annual reporting burden for the new information collection requirements in this ICR is estimated to range from 53 to 57 hours per respondent. This burden includes time for facility owners and operators to submit to the permitting agency a notice of intent and supporting materials for a standardized permit application, if required, and permit modification requests for significant changes.

The annual record keeping burden for the new information collection requirements in this ICR is estimated to range from 31 to 178 hours per respondent. This includes time for reading the regulations and keeping records under section 270.290 and, if required, under sections 270.300 to 270.315 for containers, tanks, equipment, and air emission controls.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR Chapter 15.

To comment on EPA 's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2011-0624, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2011-0624 and OMB Control Number 2050-0182 in any correspondence.

EXHIBIT 1 Con't.										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
APPLYING FOR A STANDARDIZED PERMIT										
INFORMATION COLLECTION ACTIVITY	Hours and Costs per Respondent							Total Hours and Costs		
	Leg. \$ 104.18/Hr	Mgr. \$ 84.86/Hr	Tech. \$ 40.68/Hr	Cler. \$ 22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Equipment Information Requirements (270.310)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$ 31.39	\$ 0.00	1	1	\$ 31
Maintain the equipment identification number and hazardous waste management unit identification	0.00	0.25	0.25	0.10	0.60	\$ 33.66	\$ 0.00	1	1	\$ 34
Prepare and maintain approximate locations within the facility	0.00	0.25	0.25	0.10	0.60	\$ 33.66	\$ 0.00	1	1	\$ 34
Prepare and maintain descriptions of the type of equipment	0.00	0.50	3.00	0.50	4.00	\$ 175.84	\$ 0.00	1	4	\$ 176
Prepare and maintain descriptions of the percent by weight of total organics in the hazardous waste stream at the equipment	0.00	0.25	1.00	0.25	1.50	\$ 67.58	\$ 0.00	1	2	\$ 68
Prepare and maintain descriptions of the hazardous waste state at the equipment	0.00	0.25	1.00	0.25	1.50	\$ 67.58	\$ 0.00	1	2	\$ 68
Prepare and maintain descriptions of the methods of compliance	0.00	0.25	1.00	0.25	1.50	\$ 67.58	\$ 0.00	1	2	\$ 68
Prepare and maintain an implementation schedule for compliance with Part 264 subpart BB requirements	0.00	0.25	1.00	0.25	1.50	\$ 67.58	\$ 0.00	1	2	\$ 68
Develop and maintain a performance test plan	0.00	1.00	7.00	2.00	10.00	\$ 415.08	\$ 0.00	1	10	\$ 415
Develop and maintain documentation that demonstrates compliance with equipment standards	0.00	1.00	16.00	2.00	19.00	\$ 781.20	\$ 0.00	1	19	\$ 781
Develop and maintain documentation to demonstrate compliance with Section 264.1060	0.00	0.50	2.00	0.50	3.00	\$ 135.16	\$ 0.00	1	3	\$ 135
Air Emissions Control Requirements (270.315)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$ 31.39	\$ 0.00	2	1	\$ 63
Prepare and maintain documentation for floating roof covers	0.00	0.25	0.25	0.00	0.50	\$ 31.39	\$ 0.00	2	1	\$ 63
Prepare and maintain a certification that covers meet applicable design specifications	0.00	0.25	0.50	0.00	0.75	\$ 41.56	\$ 0.00	2	2	\$ 83
Prepare and maintain identification and certifications for container areas	0.00	0.25	0.50	0.00	0.75	\$ 41.56	\$ 0.00	2	2	\$ 83
Prepare and maintain documentation for enclosures used to control air pollutant emissions from tanks or containers	0.00	0.10	0.15	0.00	0.25	\$ 14.59	\$ 0.00	2	1	\$ 29
Prepare and maintain documentation for closed-vent systems and control devices	0.00	0.10	0.15	0.00	0.25	\$ 14.59	\$ 0.00	2	1	\$ 29
Develop and maintain emission monitoring plans and control device monitoring methods	0.00	3.00	6.00	2.00	11.00	\$ 544.12	\$ 0.00	2	22	\$ 1,088
Switching from an Individual RCRA Permit to a Standardized Permit (124.203)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$ 31.39	\$ 0.00	83	42	\$ 2,605
Prepare and submit the request to the Director	0.50	1.00	2.00	0.50	4.00	\$ 229.68	\$ 4.00	83	332	\$ 19,395
Reapplying for a Standardized Permit (270.10(h))										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$ 31.39	\$ 0.00	0	0	\$ 0
Prepare and submit the notice of intent	0.50	1.00	2.00	0.50	4.00	\$ 229.68	\$ 4.00	0	0	\$ 0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	2,122	13,437	\$ 1,170,865

EXHIBIT 2										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
MAINTAINING A STANDARDIZED PERMIT										
	Hours and Costs per Respondent							Total Hours and Costs		
INFORMATION COLLECTION ACTIVITY	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Making Routine Changes (124.212 & 270.320(a))										
Read the regulations	2.00	100	100	0.00	4.00	\$333.90	\$0.00	9	36	\$3,005
Prepare and submit revised information to the Director	100	100	8.00	2.00	12.00	\$559.94	\$4.00	9	108	\$5,075
Submit revised information to facility mailing list and local governments	0.00	0.25	100	0.25	150	\$67.58	\$4.00	9	14	\$644
Making Routine Changes Requiring Prior Approval (124.213 & 270.320)										
Read the regulations	2.00	100	100	0.00	4.00	\$333.90	\$0.00	9	36	\$3,005
Prepare and submit modification request to the Director	100	100	8.00	2.00	12.00	\$559.94	\$4.00	9	108	\$5,075
Submit revised information to facility mailing list and local governments	0.00	0.25	100	0.25	150	\$67.58	\$4.00	9	14	\$644
Making Significant Changes (124.213 & 270.320(b))										
Read the regulations	2.00	100	100	0.00	4.00	\$333.90	\$0.00	3	12	\$1,002
Prepare and submit proof of public notice	0.00	0.25	100	0.25	150	\$67.58	\$4.00	3	5	\$25
Prepare and submit the modification request to the Director	5.00	15.00	80.00	12.00	112.00	\$5,320.96	\$8,000.00	3	336	\$39,963
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	36	511	\$58,628

EXHIBIT 3										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
GENERAL FACILITY STANDARDS										
	Hours and Costs per Respondent							Total Hours and Costs		
INFORMATION COLLECTION ACTIVITY	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Obtaining an Identification Number (267.12)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Obtain, fill out, and submit an application for an EPA identification number	0.00	0.25	0.50	0.25	100	\$47.24	\$4.00	0	0	\$0
Waste Analysis (267.13(a))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Collect data	0.00	0.00	3.00	0.50	3.50	\$133.41	\$0.00	0	0	\$0
Perform waste analysis	0.00	0.00	10.00	0.00	10.00	\$406.80	\$1500.00	0	0	\$0
Waste Analysis Plan (267.13(b))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Collect the data required for the waste analysis plan	0.00	10.00	90.00	9.00	109.00	\$4,714.37	\$0.00	0	0	\$0
Write the waste analysis plan	0.00	10.00	60.00	9.00	79.00	\$3,493.97	\$0.00	0	0	\$0
Maintain the waste analysis plan	0.00	0.00	0.00	100	100	\$22.73	\$0.00	0	0	\$0
Security (267.14(b))										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Collect the required documents	0.00	0.00	100	0.50	150	\$52.05	\$0.00	0	0	\$0
Maintain the required documents	0.00	0.00	0.00	100	100	\$22.73	\$0.00	0	0	\$0
Inspections (267.15)										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Prepare the inspection schedule	0.00	8.00	80.00	100	89.00	\$3,956.01	\$0.00	0	0	\$0
Record the results of inspections in the inspection log	0.00	0.00	100.00	0.00	100.00	\$4,068.00	\$0.00	0	0	\$0
Maintain the inspection schedule	0.00	0.00	0.00	100	100	\$22.73	\$100.00	0	0	\$0
Employee Training (267.16(d))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Prepare outline of employee training program	0.00	3.00	18.00	3.00	24.00	\$1,055.01				
Collect employee training documentation	0.00	0.50	2.00	0.50	3.00	\$135.16	\$0.00	0	0	\$0
Maintain the employee training documentation	0.00	0.00	0.00	80.00	80.00	\$1,818.40	\$100.00	0	0	\$0
Ignitable, Reactive, or Incompatible Wastes (267.17(c))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Collect and document compliance	0.00	100	40.00	100	42.00	\$1,734.79	\$0.00	0	0	\$0
Maintain the compliance documentation	0.00	0.00	0.00	100	100	\$22.73	\$0.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 4										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
PREPAREDNESS AND PREVENTION										
	Hours and Costs per Respondent							Total Hours and Costs		
INFORMATION COLLECTION ACTIVITY	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/Year	Total Costs/ Year
Arrangements with Local Authorities (267.36(b))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$5173	\$0.00	0	0	\$0
Document any refusals of local authorities and place in operating record	0.00	0.25	1.00	0.50	175	\$73.26	\$0.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 5										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
CONTINGENCY PLAN AND EMERGENCY PROCEDURES										
	Hours and Costs per Respondent							Total Hours and Costs		
INFORMATION COLLECTION ACTIVITY	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/Year	Total Costs/ Year
Contingency Plan (267.51-54)										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Collect the data required in the contingency plan	0.00	0.00	12.00	3.00	15.00	\$566.35	\$0.00	0	0	\$0
Write the contingency plan	0.00	1.00	60.00	4.00	65.00	\$2,616.58	\$0.00	0	0	\$0
Submit the contingency plan to State and local authorities	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Maintain the contingency plan	0.00	0.00	0.00	1.00	1.00	\$22.73	\$0.00	0	0	\$0
Emergency Reporting (267.56(c), 267.58(a) & (b))										
Read the regulations	0.00	0.25	0.75	0.00	100	\$51.73	\$0.00	0	0	\$0
Submit the notification of an imminent or actual emergency situation to State and/or local authorities	0.00	0.50	0.00	0.00	0.50	\$42.43	\$0.00	0	0	\$0
Notify the on-scene coordinator or the National Response Center of any release	0.00	0.50	0.00	0.00	0.50	\$42.43	\$0.00	0	0	\$0
Collect the information required in the emergency report	0.00	0.00	2.50	0.50	3.00	\$113.07	\$0.00	0	0	\$0
Write the emergency notification report	0.00	1.00	0.00	0.00	1.00	\$84.86	\$0.00	0	0	\$0
Collect the information required in the emergency report	0.00	0.00	8.00	0.50	8.50	\$336.81	\$0.00	0	0	\$0
Write the emergency report	0.00	0.25	4.00	0.50	4.75	\$195.30	\$0.00	0	0	\$0
Compile information that demonstrates that all affected areas are in compliance	0.00	0.00	2.50	0.50	3.00	\$113.07	\$0.00	0	0	\$0
Prepare a letter notifying the Regional Administrator of compliance	0.00	0.25	1.50	0.25	2.00	\$87.92	\$0.00	0	0	\$0
Record the details of any incident that requires implementing the contingency plan in the operating record	0.00	0.00	0.50	0.25	0.75	\$26.02	\$0.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 6										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
RECORD KEEPING, REPORTING, AND NOTIFYING										
	Hours and Costs per Respondent							Total Hours and Costs		
INFORMATION COLLECTION ACTIVITY	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Record Keeping (267.71)										
Maintain documents in the facility operating record	0.00	0.00	50.00	100.00	150.00	\$4,307.00	\$0.00	0	0	\$0
Notifications (267.74)										
Read the regulations	0.00	0.10	0.25	0.00	0.35	\$18.66	\$0.00	0	0	\$0
Prepare and submit written notification to new owner or operator	0.00	0.00	0.50	0.13	0.63	\$23.29	\$0.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 7										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
CLOSURE										
INFORMATION COLLECTION ACTIVITY	Hours and Costs per Respondent							Total Hours and Costs		
	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Closure Plan (267.112)										
Read the regulations	0.00	1.00	6.00	0.00	7.00	\$328.94	\$0.00	0	0	\$0
Conduct a hazardous waste inventory	0.00	0.00	16.00	0.00	16.00	\$650.88	\$0.00	0	0	\$0
Record the results of the hazardous waste inventory	0.00	0.00	4.00	1.00	5.00	\$185.45	\$0.00	0	0	\$0
Write a description for the necessary closure activities	0.00	2.00	40.00	6.00	48.00	\$1,933.30	\$0.00	0	0	\$0
Estimate final closure	0.00	2.00	16.00	2.00	20.00	\$866.06	\$0.00	0	0	\$0
Write the closure schedule	0.00	1.00	2.00	1.00	4.00	\$188.95	\$0.00	0	0	\$0
Notification Before Partial Closure and Final Closure (267.112(c))										
Read the regulations	0.00	0.20	0.50	0.00	0.70	\$37.31	\$0.00	0	0	\$0
Prepare the written notification of closure	0.00	0.50	1.00	0.50	2.00	\$94.48	\$4.00	0	0	\$0
Submit the closure plan	0.00	0.00	0.00	1.00	1.00	\$22.73	\$4.00	0	0	\$0
Certification of Closure										
Read the regulations	0.00	0.20	0.50	0.00	0.70	\$37.31	\$0.00	0	0	\$0
Prepare the certification	0.00	0.00	22.00	4.00	26.00	\$985.88	\$500.00	0	0	\$0
Submit the certification	0.00	0.00	0.00	2.00	2.00	\$45.46	\$4.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 8										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
FINANCIAL REQUIREMENTS										
INFORMATION COLLECTION ACTIVITY	Hours and Costs per Respondent							Total Hours and Costs		
	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
Reading the Regulations										
Read the regulations covering financial requirements	8.00	2.00	8.00	0.00	10.00	\$1,328.60	\$0.00	0	0	\$0
Cost Estimate for Closure (267.142(a)-(c))										
Prepare a detailed estimate of closure costs	0.00	0.00	1.00	3.00	13.00	\$474.99	\$0.00	0	0	\$0
Update the estimate for inflation annually	0.00	0.00	0.50	0.00	0.50	\$20.34	\$0.00	0	0	\$0
Maintain the estimate at the facility (under record keeping)	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0
Closure Trust Fund (267.143(a))										
Establish a closure trust fund	4.00	150	2.00	0.50	8.00	\$636.74	\$0.00	0	0	\$0
Submit a signed duplicate of the trust agreement to the Regional Administrator	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Submit a receipt for the first payment to the Regional Administrator	0.00	0.00	0.00	1.00	1.00	\$22.73	\$4.00	0	0	\$0
Surety Bond Guaranteeing Payment into a Closure Trust Fund (267.143(b))										
Establish a surety bond and trust agreement	4.00	150	2.00	0.50	8.00	\$636.74	\$0.00	0	0	\$0
Submit originally signed duplicates of the surety bond and trust agreement to the Regional Administrator	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Surety Bond Guaranteeing Performance of Closure (267.143(c))										
Obtain a surety bond and trust agreement	4.00	150	2.00	0.50	8.00	\$636.74	\$0.00	0	0	\$0
Submit signed duplicates of the surety bond and trust agreement to the Regional Administrator	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Closure Letter of Credit (267.143(d))										
Obtain a letter of credit and establish a stand-by trust fund	4.00	150	2.00	0.50	8.00	\$636.74	\$0.00	0	0	\$0
Submit the letter of credit and a duplicate of the trust agreement to the Regional Administrator	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Closure Insurance (267.143(e))										
Obtain a closure insurance policy	4.00	150	2.00	0.50	8.00	\$636.74	\$0.00	0	0	\$0
Submit a certificate of the insurance policy to the Regional Administrator	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Corporate Financial Test and Corporate Guarantee (267.143(f) & (g))										
Prepare and submit the letter signed by the chief financial officer	1.00	0.25	2.00	0.75	4.00	\$223.80	\$4.00	0	0	\$0
Submit a copy of the independent certified public accountant's report and special report	0.00	0.00	0.00	1.00	1.00	\$22.73	\$4.00	0	0	\$0
Submit updated information annually	0.00	0.00	0.00	4.00	4.00	\$90.92	\$4.00	0	0	\$0
Prepare and submit a notice of intent to establish alternate financial assurance to the Regional Administrator	3.25	0.25	0.00	0.50	4.00	\$371.17	\$4.00	0	0	\$0
Write and submit additional reports of the facility's financial condition, as directed by the Regional Administrator	2.25	0.25	1.00	0.50	4.00	\$307.67	\$4.00	0	0	\$0
Submit the corporate guarantee from the parent corporation	0.00	0.00	0.00	1.00	1.00	\$22.73	\$4.00	0	0	\$0

EXHIBIT 8 Con't.										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
FINANCIAL REQUIREMENTS										
	Hours and Costs per Respondent							Total Hours and Costs		
	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/ Year	Total Costs/ Year
INFORMATION COLLECTION ACTIVITY										
Use of a Financial Assurance Instrument for Multiple Facilities (267.143(i))										
Submit required information to the Regional Administrator	0.50	100	0.50	2.00	4.00	\$202.75	\$4.00	0	0	\$0
Submit evidence of financial assurance to all other applicable Regional Administrators	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
Trust Fund for Liability Coverage (267.147(a)(3))										
Establish a trust fund	4.50	150	100	100	8.00	\$659.51	\$0.00	0	0	\$0
Submit a duplicate of the trust agreement to the Regional Administrator	0.00	0.00	0.00	100	100	\$22.73	\$4.00	0	0	\$0
Surety Bond for Liability Coverage (267.147(a)(2))										
Obtain a surety bond and submit a copy to the Regional Administrator	4.00	100	2.00	100	8.00	\$605.67	\$4.00	0	0	\$0
Letter of Credit for Liability Coverage (267.147(a)(3))										
Obtain a standby letter of credit and submit a copy to the Regional Administrator	4.00	100	2.00	100	8.00	\$605.67	\$4.00	0	0	\$0
Liability Insurance (267.147(a)(4))										
Obtain an insurance policy and submit documentation to the Regional Administrator	4.00	100	2.00	100	8.00	\$605.67	\$4.00	0	0	\$0
Financial Test for Liability Coverage (267.147(a)(5) & 267.147(f))										
Prepare, write, and submit the letter signed by the chief financial officer	100	0.25	2.00	0.75	4.00	\$223.80	\$4.00	0	0	\$0
Obtain and submit the report and special report from the independent certified public accountant	0.00	0.00	0.00	100	100	\$22.73	\$4.00	0	0	\$0
Submit updated information annually	0.00	0.00	0.00	4.00	4.00	\$90.92	\$4.00	0	0	\$0
Prepare and submit a notice of intent to establish alternate financial assurance to the Regional Administrator	3.25	0.25	0.00	0.50	4.00	\$371.17	\$4.00	0	0	\$0
Corporate Guarantee for Liability Coverage (267.147(g))										
Obtain and submit a written guarantee to the Regional Administrator	0.50	0.50	0.50	0.50	2.00	\$126.23	\$4.00	0	0	\$0
Submit a letter from the guarantor's chief financial officer	0.00	0.00	0.00	100	100	\$22.73	\$4.00	0	0	\$0
Submit updated information annually	0.00	0.00	0.00	4.00	4.00	\$90.92	\$4.00	0	0	\$0
Incapacity of Owners or Operator, Guarantors, or Financial Institutions (267.148)										
Submit by certified mail a notice of bankruptcy to the Regional Administrator	0.00	0.00	0.00	100	100	\$22.73	\$4.00	0	0	\$0
State Assumption of Responsibility (267.150)										
Prepare and submit a letter from the owner or operator to the Regional Administrator	100	5.00	2.00	0.50	8.50	\$621.21	\$4.00	0	0	\$0
Obtain and submit the letter from the State	0.00	0.00	0.00	100	100	\$22.73	\$4.00	0	0	\$0
Prepare and submit any additional information requested by the Regional Administrator	0.75	0.25	0.75	0.25	2.00	\$135.54	\$4.00	0	0	\$0
Total	Varies	Varies	Varies	Varies	Varies	Varies	Varies	0	0	\$0

EXHIBIT 9										
STANDARDIZED PERMITS										
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST										
SPECIFIC UNIT REQUIREMENTS										
INFORMATION COLLECTION ACTIVITY	Hours and Costs per Respondent							Total Hours and Costs		
	Leg. \$104.18/Hr	Mgr. \$84.86/Hr	Tech. \$40.68/Hr	Cler. \$22.73/Hr	Respondent Hours/Year	Labor Cost/Year	O&M Cost/Year	Number of Respondents	Total Hours/Year	Total Costs/ Year
CONTAINERS										
Inspection Requirements (267.172 & 267.15(d))										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Prepare the no free liquids demonstration	0.00	0.00	1.50	0.00	1.50	\$61.02	\$475.00	0	0	\$0
Perform weekly inspections and record results	0.00	0.00	100.00	0.00	100.00	\$4,068.00	\$0.00	0	0	\$0
TANK SYSTEMS										
Applicability (267.190)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Design and Construction Standards (267.191)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Obtain an engineer's written assessment	0.00	3.00	12.00	1.00	16.00	\$765.47	\$2,000.00	0	0	\$0
Installation Requirements (267.194)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Obtain the written statements	0.00	0.00	7.00	1.50	8.50	\$318.86	\$1,000.00	0	0	\$0
Maintain the written statements at the facility	0.00	0.00	0.00	0.10	0.10	\$2.27	\$4.00	0	0	\$0
Inspection Requirements (267.199)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Develop an inspection schedule	0.00	8.00	80.00	1.00	89.00	\$3,956.01	\$0.00	0	0	\$0
Perform daily inspections and record the results	0.00	0.00	100.00	0.00	100.00	\$4,068.00	\$0.00	0	0	\$0
Perform annual inspections of cathodic protection system and record the results	0.00	0.00	20.00	0.00	20.00	\$813.60	\$0.00	0	0	\$0
Perform bimonthly inspections of sources of impressed current and record the results	0.00	0.00	40.00	0.00	40.00	\$1,627.20	\$0.00	0	0	\$0
Leaks and Spills (267.200)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Prepare and submit a report to the Regional Administrator (within 24 hours of leak detection)	0.00	0.00	0.25	0.00	0.25	\$10.17	\$4.00	0	0	\$0
Prepare and submit a report to the Regional Administrator (within 30 days of leak detection)	0.00	1.00	7.50	1.00	9.50	\$412.69	\$4.00	0	0	\$0
Obtain and submit an engineer's certification	0.00	0.00	0.00	0.50	0.50	\$11.37	\$4.00	0	0	\$0
CONTAINMENT BUILDINGS										
Additional Standards for Liquid Storage (267.1103(d))										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Inspect data weekly and record the results	0.00	0.00	26.00	0.00	26.00	\$1,057.68	\$0.00	0	0	\$0
Waiver from Secondary Containment Requirements (267.1104)										
Read the regulations	0.00	0.25	0.25	0.50	1.00	\$42.75	\$0.00	0	0	\$0
Prepare the free liquids demonstration	1.00	1.00	2.00	0.50	4.50	\$281.77	\$1,500.00	0	0	\$0
Containment Buildings with Areas Both with and without Secondary Containment (267.1105)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Prepare and maintain a written description of operating procedures	0.00	0.00	1.00	0.25	1.25	\$46.36	\$0.00	0	0	\$0
Releases of Hazardous Waste (267.1106)										
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$31.39	\$0.00	0	0	\$0
Enter a record of the discovery in the operating record	0.00	0.00	0.50	0.00	0.50	\$20.34	\$0.00	0	0	\$0
Prepare and submit a notification to the Director within 7 days	0.00	0.00	0.50	0.00	0.50	\$20.34	\$4.00	0	0	\$0
Prepare and submit a written notification within 14 days	0.00	0.00	0.50	0.25	0.75	\$26.02	\$4.00	0	0	\$0