

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 2455.01  
“REVISION TO THE EXPORT PROVISIONS OF THE CATHODE  
RAY TUBE (CRT) RULE - PROPOSED RULE”**

**FEBRUARY 2012**

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title and Number of the Information Collection**

This Information Collection Request (ICR) is entitled “Revision to the Export Provisions of the Cathode Ray Tube (CRT) Rule – Proposed Rule,” EPA ICR Number 2455.01.

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

The U.S. Environmental Protection Agency (EPA) promulgated the CRT rule on July 28, 2006 (71 FR 42928). In that rule, EPA amended its regulations under the Resource Conservation and Recovery Act (RCRA) to streamline the management requirements for used CRTs in an effort to encourage recycling and reuse of these materials rather than landfilling or possible incineration. The CRT rule also contained requirements for used CRTs exported for reuse or recycling. Exporters of used CRTs for recycling must notify EPA of an intended shipment before the shipment occurs. Notifications may cover exports extending over a 12-month or shorter period. The notification must include several items of information. When EPA receives this information, it notifies the receiving country. When the receiving country consents in writing to receive the CRTs, EPA forwards an Acknowledgement of Consent (AOC) to the exporter. The exporter may not ship the CRTs until he receives the AOC. With respect to CRTs that are exported for reuse, the CRT rule requires exporters to submit a one-time notification to EPA with contact information and a statement that they are exporting the CRTs for reuse. They must keep copies of normal business records demonstrating that each shipment will be reused. (See 40 CFR 261.39 and 261.41 for existing notification and recordkeeping requirements about used CRTs exported for reuse or recycling. The burden associated with these requirements is approved under EPA ICR Number 1189.24, and the OMB control number for this ICR is 2050-0053.)

EPA is proposing to revise the export provisions of the CRT rule. The purpose of these proposed revisions is to address certain implementation concerns with the current export provisions of the CRT rule. EPA is proposing a definition of “CRT exporter” that includes any intermediaries arranging for the export. Because CRTs are sometimes exported to more than one recycler in the receiving country, EPA is also proposing to require that the exporter state the name and address of the recycler or recyclers and the estimated quantity of CRTs to be sent to each facility, as well as the names of any alternate recyclers.

In addition, EPA is proposing to expand the current reuse notice and model the notice on that required for CRTs exported for recycling. Instead of a one-time notice, EPA is proposing to require that reuse notices be submitted to cover a twelve month or

shorter period. EPA is also proposing to add additional items of information to the notice, including contact information about the exporter and the destination facility, the frequency or rate at which the CRTs would be exported, the quantity of CRTs, transport information, and a description of the manner in which the CRTs will be reused in the receiving country. Furthermore, EPA is proposing to require that the exporter sign a certification that the CRTs are fully functioning or capable of being functional after refurbishment. EPA believes that the proposed expanded notice will help the Agency determine whether the exported CRTs have been handled as products that are actually reused in the receiving country.

Finally, EPA is proposing to add a requirement that exporters of CRTs for recycling submit an annual report documenting the actual numbers of CRTs exported during the previous calendar year. This number may differ from the estimate submitted in the original notice. This information will help ensure that the shipments occurred under the terms approved by the receiving country, and would enable EPA to provide receiving countries with information that may help them to determine the quantity of CRTs that were received in a particular country for recycling.

In Sections 1 through 5 of this ICR, EPA presents a comprehensive description of the new information collection requirements in the proposed rule to revise the export provisions of the CRT rule. In Section 6, EPA estimates the total annual hour and cost burden to respondents and the Agency associated with these new information collection requirements.

In the following paragraphs, EPA briefly describes the new information collection requirements covered in this ICR.

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

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

EPA is proposing the information collection under the authority of Sections 2002(a), 3001, 3002, 3004, and 3006 of RCRA, as amended. The proposed rule revises the notification that must be submitted to EPA when CRTs are exported for reuse or recycling and adds a requirement that exporters of CRTs for recycling submit an annual report documenting the actual numbers of CRTs exported during the previous calendar year. EPA believes the information collection requirements covered in this ICR are needed to ensure that CRTs exported for reuse or recycling are managed in compliance with the regulations.

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

Since promulgation of the CRT rule in 2006, it has become apparent that some CRTs ostensibly exported for reuse are actually disassembled and recycled when they reach the receiving country, sometimes under unsafe conditions. EPA will use the

collected information to ensure exported CRTs have been handled as products that are actually reused in the receiving country. In addition, the collected information would enable EPA to provide receiving countries with information that may help them to determine the quantity of CRTs that were received in a particular country for recycling.

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

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

None of the information required by the proposed rule would duplicate information required by existing RCRA regulations.

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

In compliance with the Paperwork Reduction Act of 1995, EPA has issued a public notice in the *Federal Register*. The public comment period for this ICR is combined with the proposed rule, and it will run for 60 days. To assist the public in commenting on the proposal, EPA raised a few issues in the preamble to the proposed rule and asked for the public to comment on them. At the end of the comment period, EPA will review public comments received in response to the notice and will address comments received, as appropriate.

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

The proposed revisions to the export provisions of the CRT rule were recommended by the Interagency Task Force on Electronics Stewardship (the “Task Force”) in its report titled *National Strategy for Electronics Stewardship* (July 20, 2011). Several federal agencies participated in drafting the recommendations of the *National Strategy for Electronics Stewardship*, including the General Services Administration, Office of the US Trade Representative, and the Departments of Commerce, Defense, and Energy. On behalf of the Task Force, EPA solicited public comment from stakeholders through a Federal Register notice. Also on behalf of the Task Force, the Council on Environmental Quality held three stakeholder listening sessions in March 2011 with state and local government agencies, non-governmental organizations, and industry, respectively. Comments provided through both of these methods were evaluated by the Task Force and considered in developing the National Strategy on Electronics Stewardship.

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

EPA has carefully considered the information collection burden imposed upon the regulated community by the proposed rule. EPA is confident that those activities required of respondents are necessary, and to the extent possible, the Agency has attempted to minimize the burden imposed. EPA believes strongly that, if the minimum information collection requirements of the proposed rule are not met, neither the respondents (e.g., exporters) nor EPA can ensure that CRTs exported for reuse or recycling are managed in compliance with the

regulations. In addition, EPA would be unable to provide receiving countries the information that they would need to help ensure that CRTs are properly managed.

### **3(e) General Guidelines**

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

### **3(f) Confidentiality**

Section 3007(b) of RCRA; 40 *CFR* part 2, subpart B; and 40 *CFR* 260.2 contain provisions for confidentiality. If a business asserts a claim of confidentiality covering any of the information collection requirements covered in this ICR, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

### **3(g) Sensitive Questions**

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

## **THE RESPONDENTS AND THE INFORMATION REQUESTED**

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

The following is a list of Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes associated with industries most likely affected by the information collection requirements included in the existing CRT rule. The respondents for the proposed information collection requirements covered in this ICR are exporters of CRTs from these industries. The Agency estimates that a total of approximately 12 entities exported CRTs for recycling during 2011 (i.e., per EPA data on the number of approved exporters and the number of export notices that were submitted during 2011). However, far more entities are on record as being exporters of CRTs for purposes of reuse. Based on the number of CRT Reuse Notifications submitted during 2011, there exists approximately 126 such entities in the U.S. (i.e., according to data from Sept. 14<sup>th</sup>, 2011 published on EPA's CRT informational website at [ <http://www.epa.gov/epawaste/hazard/international/crts/recycling.htm> ]).

Industry	SIC Code	NAICS Code
<b>AGRICULTURE</b>		
Agricultural crop production	01	111



<b>Industry</b>	<b>SIC Code</b>	<b>NAICS Code</b>
Agricultural livestock production	02	112
Agricultural services	07	115, 311, 541, 561, 812
Forestry	08	111, 113, 115
Fishing, hunting, trapping	09	111, 112, 114
<b>MINING</b>		
Metal mining	10	212, 213
Coal mining	12	212, 213
Oil & gas extraction	13	211, 213
Non-metallic minerals, except fuels	14	212, 213
<b>CONSTRUCTION</b>		
General contractors	15	233-235
Heavy construction	16	233-235
Special trade contractors	17	233-235
<b>MANUFACTURING</b>		
Food & kindred products	20	111, 311, 312
Tobacco products	21	312
Textile mill products	22	313-315
Apparel & other textile products	23	313-315, 336, 339
Lumber & wood products	24	113, 321, 333
Furniture & fixtures	25	336, 337, 339
Paper & allied products	26	322, 326
Printing & publishing	27	323, 511, 512
Chemicals & allied products	28	211, 311, 325, 331
Petroleum and coal products	29	324
Rubber & miscellaneous plastics products	30	316, 325, 326, 337, 339
Leather & leather products	31	315, 316, 321
Stone, clay, and glass products	32	212, 327
Primary metal industries	33	331
Fabricated metal products	34	332, 337, 339
Industrial machinery & equipment	35	331-335, 339
Electronic & other electronic equipment	36	332-336, 512
Transportation equipment	37	332, 333, 336, 488, 541, 811
Instrument & related products	38	322, 325, 333, 334, 339
Miscellaneous manufacturing	39	325, 336, 339, 488
<b>TRANSPORTATION</b>		

<b>Industry</b>	<b>SIC Code</b>	<b>NAICS Code</b>
Local & inter-urban passenger transit	41	485, 487
Trucking & warehousing	42	493, 484, 488, 492, 531
U.S. postal service	43	491
Water transportation	44	483, 487, 488, 532
Transportation by air	45	481, 488, 492, 561, 621
Pipelines, except natural gases	46	486
Transportation services	47	488, 532, 561, 722
Communication	48	513
Electronic, gas, & sanitary services	49	221, 488, 562
<b>WHOLESALE TRADE</b>		
Wholesale trade-durable goods	50	421, 441-444, 446, 453
Wholesale trade-nondurable goods	51	312, 313, 422, 444, 451, 454
Bldg. materials & garden supplies	52	444, 453
<b>RETAIL TRADE</b>		
General merchandise store	53	452
Food stores	54	311, 445, 447, 722
Auto dealers & service station	55	441, 447, 452
Apparel & accessory stores	56	315, 448
Furniture & home furnishing stores	57	337, 442, 451
Eating & drinking places	58	722
Miscellaneous retail	59	339, 443, 445, 446, 448, 451, 453, 454, 522, 722
<b>FINANCE, INSURANCE, AND REAL ESTATE</b>		
Depository institution	60	521, 522
Nondepository institution	61	522, 523
Security & commodity brokers	62	523, 525, 533, 551, 813
Insurance carriers	63	523-525
Insurance agents, brokers, & services	64	523-525
Real estate	65	233, 531, 711, 812
Holding & other investment offices	67	523, 525, 533, 551, 813
<b>SERVICES</b>		
Hotels & other lodging places	70	721
Personal services	72	512, 532, 561, 611, 811, 812
Business services	73	234, 313, 314, 323, 325, 334, 421, 443, 491, 511, 512, 514, 522, 532, 541, 561, 562, 711, 811, 812
Auto repair, services, & parking	75	326, 488, 532, 811, 812
Misc. repair services	76	115, 235, 335, 442, 443, 451, 488, 561, 562, 711, 811

Industry	SIC Code	NAICS Code
Motion picture	78	334, 421, 512, 514, 532, 541, 561, 711
Amusement & recreation services	79	487, 532, 561, 611, 711, 712, 713
Health services	80	339, 541, 621
Legal services	81	541
Educational services	82	514, 611
Social services	83	623, 624, 813, 922
Museums, botanical, zoological gardens	84	712
Membership organization	86	561, 813, 912
Engineering & management service	87	233, 234, 541, 561, 611
Private household services	88	81
Services	89	512, 541, 711

#### **4(b) Information Requested**

##### **(1) Revised Export Notification for Used CRTs Destined for Recycling**

Under existing 40 *CFR* 261.39(a)(5), exporters of used, broken CRTs must provide written notification to EPA of an intended export before the CRTs are scheduled to leave the U.S. The existing notice (40 *CFR* 261.39(a)(5)(F)) requires the exporter to state the name and address of the recycler and any alternate recycler. Because CRTs are sometimes exported to more than one recycler in the receiving country, EPA is proposing to replace this language with a requirement that the exporter state the name and address of the recycler or recyclers and the estimated quantity of CRTs to be sent to each facility, as well as the names of any alternate recyclers.

##### **(2) Annual Report for CRTs Exported for Recycling**

Under new 40 *CFR* 261.39(a)(5)(x), exporters must file with EPA no later than March 1 of each year, a report summarizing the quantities (in kilograms), frequency of shipment, and ultimate destination(s) of all CRTs exported during the previous calendar year. Such reports must also include the following:

- The name, EPA ID number (if applicable), and mailing and site address of the exporter;
- The calendar year covered by the report;
- A certification signed by the exporter which states:

“I certify under penalty of law that I have personally examined and am familiar with the

information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.”

### (3) Revised Export Notification for Used CRTs Destined for Reuse

Under existing 40 *CFR* 261.41, exporters of used, intact CRTs for reuse must submit a one-time notification with minimal information to EPA. To require exporters to submit more complete information about the purported reuse of the exported CRTs over a specific period of time, EPA is proposing to add items to the reuse notification that are modeled on those required in the notification for CRTs exported for recycling. This notification may cover export activities extending over a twelve (12) month or lesser period. The notification must be in writing, signed by the exporter, and include the following information:

- Name, mailing address, telephone number and EPA ID number (if applicable) of the exporter of the CRTs.
- The estimated frequency or rate at which the CRTs are to be exported and the period of time over which they are to be exported.
- The estimated total quantity of CRTs specified in kilograms.
- All points of entry to and departure from each transit country through which the CRTs will pass, a description of the approximate length of time the CRTs will remain in such country and the nature of their handling while there.
- A description of the means by which each shipment of the CRTs will be transported (e.g., mode of transportation vehicle (air, highway, rail, water, etc.), type(s) of container (drums, boxes, tanks, etc.)).
- The name and address of the ultimate destination facility or facilities and the estimated quantity of CRTs to be sent to each facility, as well as the name of any alternate destination facility or facilities.
- A description of the manner in which the CRTs will be reused (including reuse after refurbishment) in the foreign country that will be receiving the CRTs.
- A certification signed by the exporter which states:

“I certify under penalty of law that the CRTs described in this notice are fully functioning or capable of being functional after refurbishment. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.”

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

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

### **5(a) Agency Activities**

#### **(1) Export Notification for Used CRTs Destined for Recycling**

Per the existing CRT rule, Agency activities associated with the conditional exclusion for used CRTs exported for recycling will continue as described below. There will be only minor additional information received under the proposed revised export notification for the Agency to review and process.

- Receive and review notification submitted by an exporter of used CRTs to determine whether or not the notification is complete. A notification is complete when EPA determines that it satisfies the requirements of 40 *CFR* 261.39(a)(5)(i).
- Solicit, from exporter, additional information requested by the receiving country.
- Provide, in conjunction with the Department of State, the complete notification to the receiving country.
- Forward the receiving/transit country's written consent to the receipt of the used CRTs to the exporter.
- Prepare and send written notification to the exporter if the receiving/transit country objects to the receipt of the used CRTs or withdraws a prior consent.
- Keep copies of notifications, consents, and other related documents.

#### **(2) Annual Report for CRTs Exported for Recycling**

Agency activities associated with the new requirement for submission of an annual report for exporters of CRTs sent for recycling include the following:

- Receive and record the report.

### **(3) Export Notification for Used CRTs Destined for Reuse**

Per the existing CRT rule, Agency activities associated with the conditional exclusion for used CRTs exported for reuse will continue as described below. There will be additional information received under the proposed revised export notification, similar to the information contained in the notice for CRTs exported for recycling, for the Agency to review and process (see Exhibit 3).

- Receive and process notification submitted by exporter of used CRTs.
- Keep copy of notification.

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

In collecting and analyzing the information submitted under 40 *CFR* 261.39(a)(5) and 261.41, EPA will use equipment such as personal computers and applicable database software, where appropriate. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal.

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

In establishing the existing conditional exclusion for used CRTs, EPA considered the reporting and recordkeeping burden for small businesses. The conditional exclusion was a regulatory relief initiative that reduced hour and cost burden for generators and subsequent handlers of excluded CRTs, particularly small entities. These reductions in hour and cost burden under the existing exclusion will not be significantly impacted as result of the newly proposed information requirements.

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

#### **(1) Export Notification for Used CRTs Destined for Recycling**

Exporters of used CRTs destined for recycling must provide written notification to EPA of an intended export before the CRTs are scheduled to leave the U.S. A complete notification must be submitted 60 days before the initial shipment is intended to be shipped off site. This notification may cover export activities extending over a 12-month or lesser period. In addition, upon request by EPA, exporters must furnish to EPA any additional information that a receiving country requests in order to respond to a notification.

#### **(2) Annual Report for CRTs Exported for Recycling**

Exporters must file with EPA no later than March 1 of each year, a report summarizing the quantities (in kilograms), frequency of shipment, and ultimate destination(s) of all CRTs exported during the previous calendar year.

### **(3) Export Notification for Used CRTs Destined for Reuse**

Exporters of used CRTs destined for reuse must send a notification to EPA. This notification may cover export activities extending over a 12-month or lesser period. In addition, they must keep, at the facility, copies of normal business records (e.g., contracts) demonstrating that each shipment of exported CRTs will be reused.

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

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

In Exhibits 1, 2 and 3, EPA estimates the respondent burden hours associated with the new information collection requirements in the proposed rule. Exhibit 1 includes estimates of burden hours (total and by labor type) per entity (exporter or respondent) for reading the rule. EPA estimates 3.5 hours per respondent for reading the rule and a universe of 138 respondents. This would result in a total of 483 hours for all of the respondents reading the rule. For a one-time activity like reading the rule, EPA annualizes the burden hours over a three year effective life of the ICR. This is done by dividing the number of respondents by three ( $138/3 = 46$ ) and then calculating the total hours ( $46 \times 3.5 = 161$  hours). Exhibit 2 includes estimates of burden hours (total and by labor type) per respondent for the new annual reporting by exporters of CRTs for recycling. EPA estimates 3.4 hours per large exporter and 2.1 hours per small exporter. EPA also estimates 12 exporters of CRTs for recycling, and assumes that one-half (6) of the exporters are large exporters and one-half (6) are small exporters. This would result in a total of 33 hours for the new annual reporting by all 12 exporters. Exhibit 3 includes estimates of burden hours (total and by labor type) per notice prepared and submitted by a respondent under the modified reuse and recycling notification requirements. EPA estimates 0.15 hour per modified notice and a total of 233 to 435 reuse and recycling notices submitted by respondents each year. This would result in a total of 35 hours to 65 hours for preparation and submission of the modified reuse and recycling notices by respondents. Therefore, based on the above burden hour calculations, EPA estimates that the total annual respondent burden for the new information collection requirements in the proposed rule ranges from 229 to 259 hours.

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

EPA estimates that the total annual respondent cost for the new information collection requirements in the proposed rule to be \$17,591 to \$19,714. The total annual cost includes the cost for reading the rule, cost for new annual reporting by exporters of CRTs for recycling, and the cost for preparation and submission of the revised reuse and recycling notices by respondents. EPA's estimates for costs to be incurred by respondents for the new information collection requirements in the proposed rule are included in Exhibits 1, 2 and 3.

#### **Labor Costs**

For purposes of this analysis, EPA estimates an average hourly respondent labor cost of



\$107.06 for managerial staff, \$70.08 for technical staff, and \$36.60 for clerical staff. These labor rates were originally obtained by relying on prior EPA Cost Assessments and then updated to 2011 using Employment Cost Indices developed by the U.S. Bureau of Labor Statistics. (See “Economic Impacts Assessment for Proposed Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule,” which is available in the public docket identified under Section 6(g)).

### **Annual Capital and Operation & Maintenance Costs**

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

O&M costs are those costs associated with paperwork requirements incurred continually over the life of the ICR. They are defined by the EPA as “the recurring dollar amount of costs associated with O&M or purchasing services.” Minimal O&M costs were assumed to be associated with the preparation and submission of new Annual Reports and Notification requirements in the proposed rule. These costs are for mailing, copying, faxing, and for making telephone calls.

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

In Exhibits 2 and 3, EPA provides estimates of the Agency hour and cost burden associated with the new information collection requirements covered in this ICR. EPA estimates an average hourly labor cost of \$74.67 for managerial staff (GS-14, Step 1), \$63.20 for technical staff (GS-13, Step 1), and \$36.64 for clerical staff (GS-9, Step 1). To derive these hourly estimates, EPA referred to the *General Schedule (GS) Salary Table 2011*. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive these loaded hourly rates. (See “Economic Impacts Assessment for Proposed Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule,” which is available in the public docket identified under Section 6(g)).

### **Receive and Record Annual Reports Submitted by Exporters of CRTs for Recycling**

EPA estimates that it will receive 12 annual reports per year. EPA estimates that it will incur \$24.64 to receive and record each annual report (see Exhibit 2). Thus, EPA estimates that the Agency will experience an annual cost of \$295.68 (i.e., 12 annual reports/year x \$24.64/report) to meet this requirement of the proposed rule.

### **Receive and Process Revised Reuse and Recycling Notifications**

EPA estimates that it will incur an additional cost of \$10.51 per notice to receive and process these notices (see Exhibit 3). Thus, EPA estimates that the Agency will experience a total

incremental

annual cost in the range of \$2,386 to \$4,453 under the proposed rule.

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

The Agency estimates that a total of approximately 12 entities exported CRTs for recycling during 2011 (i.e., per EPA data on the number of approved exporters and the number of export notices that were submitted during 2011). However, far more entities are on record as being exporters of CRTs for purposes of reuse. Based on the number of CRT Reuse Notifications submitted during 2011, there exists approximately 126 such entities in the U.S. (i.e., according to data from Sept. 14<sup>th</sup>, 2011 published on EPA's CRT informational website at [<http://www.epa.gov/epawaste/hazard/international/crts/recycling.htm>]). Therefore, as shown below in Table 1, EPA estimates that 138 entities will be subject to the new information collection requirements covered in this ICR.

**TABLE 1**

#### **NUMBER OF EXPORTER ENTITIES (RESPONDENTS) POTENTIALLY AFFECTED BY THE PROPOSED RULE**

<b>Type of Entity</b>	<b>Number of Entities</b>
Exporter of CRTs for Recycling	12
Exporter of CRTs for Reuse	126
<b>Total</b>	<b>138</b>

#### **Respondent Burden and Cost**

In the following paragraphs, EPA discusses the assumptions used in developing the respondent burden estimates associated with the new information collection requirements covered in Exhibits 1, 2, and 3 of this ICR.

#### **Reading the Regulations**

EPA estimates that 138 U.S. exporters will need to read the rule in order to understand and comply with the new requirements. For purposes of this analysis, we assumed that the hours required for reading/reviewing this new rule would be similar to the hours used in EPA's assessment of the impacts associated with reading/reviewing the 2009 Final Rule governing the Exporting of Spent Lead-Acid Batteries (SLAB). In Exhibit 1, EPA estimates 3.5 hours per respondent for reading the rule for the 138 respondents. This would result in a total of 483 hours

for all of the respondents reading the rule. As noted in Section 6(a), for a one-time activity like reading the rule, EPA annualizes the burden hours over a three year effective life of the ICR. This is done by dividing the number of respondents by three ( $138/3 = 46$ ) and then calculating the total hours ( $46 \times 3.5 = 161$  hours).

### **New Annual Reporting by Exporters of CRTs for Recycling**

As noted above in Section 6(d), EPA estimated that approximately 12 U.S. exporters of CRTs sent for recycling will be required to prepare and submit an annual report in accordance with this provision of the proposed rule. Furthermore, this new annual report for these exporters has been fashioned after other existing annual reporting requirements recently codified in the 2009 Final Rule governing the Exporting of Spent Lead-Acid Batteries (SLAB) from the U.S. Therefore, EPA used the cost estimates for annual reporting already available in the May 2009 Cost Assessment prepared for the “SLAB Rule”, as the best and most recent relevant reference (see Footnote 1 in “Economic Impacts Assessment for Proposed Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule,” which is available in the public docket identified under Section 6(g)). Based on these figures, EPA estimates that the cost for a CRT exporter to prepare and submit an annual report ranges from \$156.07 to \$203.36, depending upon whether the size of the exporter is large vs. small. For purposes of analysis, EPA assumed a 50/50 distribution of these exporters (e.g. with half considered large and half considered small). Thus, EPA estimated that the total cost of the annual reporting requirement for exporting CRTs for recycling is \$2,158.32 (i.e., \$203.36/annual report  $\times$  6 Large Recycling Exporters, plus \$156.07/annual report  $\times$  6 Small Recycling Exporters). (See Exhibit 2).

### **Revisions to Reuse and Recycling Notifications (Asking for additional Information)**

Under the current CRT Rule, exporters already must submit notifications to EPA indicating their intent to export CRTs. The proposed CRT Rule revisions call for very minor additional reporting elements to the current CRT rule requirements. To calculate the notification-related cost impacts, EPA started by relying on the original burden hour estimates associated with the current notification requirements. EPA then adjusted these burden hour estimates to reflect our best estimate of the potential burden associated with the proposed changes in the notification requirements. Our best estimate is that these burden estimates would not exceed 10% of the burden attributable to the current notification requirements. Then EPA utilized the adjusted burden estimates and labor rates in combination with the projected quantity of CRT Notices to derive costs associated with the relevant proposed changes to the CRT notification process. Based on the calculations above, EPA estimated that CRT exporters will submit between 233 and 435 notices each year. We estimated that each notice will cost an additional \$10.26 (see Exhibit 3). In total, EPA estimates that the additional costs to exporters will be in the range of \$2,386 to \$4,453 (i.e., 233 to 435 notices per year  $\times$  \$10.26 per notice) under the proposed rule.

## **Total Respondent Burden and Cost**

In Exhibits 1, 2, and 3, EPA presents a summary of the total annual respondent burden and costs associated with the new information collection requirements in the proposed rule. The specific information collection activities of the new paperwork requirements are described throughout this ICR.

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

#### **Respondent Tally**

In Exhibits 1, 2 and 3, EPA presents the total annual respondent burdens and costs associated with the new information collection requirements in the proposed rule. As described specifically in Section 6(d) above, there are 138 respondents (12 U.S. exporters of CRTs sent for recycling and 126 U.S. exporters of CRTs sent for reuse) that will be subject to the new information collection requirements covered in this ICR. Based on the information in Exhibits 1, 2, and 3, the total annual respondent burden for the new paperwork requirements will range from 229 to 259 hours, and the total annual respondent cost for the new paperwork requirements will be approximately \$17,600 to \$19,700

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

EPA is proposing to revise certain export provisions of the CRT final rule published on July 28, 2006 (71 FR 42928) to ensure that CRTs are managed in compliance with the regulations.

These revisions will require exporters of CRTs to provide some additional information to EPA (see Section 6(d)).

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

The estimated annual burden for this collection of information ranges from 0.15 to 3.5 hours per response for the 138 respondents. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the

use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2011-1014, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2011-1014 and OMB Control Number 2050-NEW in any correspondence.

**Exhibit 1**  
**Estimated Respondent Burden and Cost for Reading the Rule**

Activity	Cost per Entity						Cost of All Entities		
	Managerial Staff Hours <sup>a</sup>	Technical Staff Hours <sup>a</sup>	Clerical Staff Hours <sup>a</sup>	Hours	Labor Cost <sup>b</sup>	Materials Cost <sup>c</sup>	Total Cost per Entity	Number of Entities <sup>d</sup>	Total Cost
<b>Reading the Regulations</b>									
U.S. Exporters	1.00	2.50	0.00	3.50	\$282.26	\$0.00	\$282.26	138	\$38,952

**NOTES:**

<sup>a</sup> Based on hourly burden estimates discussed in Section 3.3 of EIA (\*).

<sup>b</sup> Based on hourly labor rates discussed in Section 3.2 of EIA.

<sup>c</sup> Based on materials costs discussed in Section 3.4 of EIA.

<sup>d</sup> Based on universe assumptions discussed in Section 3.1 of EIA.

(\*) "Economic Impacts Assessment for Proposed Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule."

**Exhibit 2**  
**Costs for New Annual Reporting by Exporters of CRTs for Recycling**

Activity	Cost per Entity							Cost for all Entities	
	Managerial Staff Hours <sup>a</sup>	Technical Staff Hours <sup>a</sup>	Clerical Staff Hours <sup>a</sup>	Total Hours	Total Labor Cost <sup>b</sup>	Material Cost <sup>c</sup>	Total Cost	Number of Entities <sup>d</sup>	Total Cost
<b>Annual Report</b>									
<b>Large U.S. Exporters</b>									
Research specific export information	0.00	1.00	1.00	2.00	\$106.68	\$0.00	\$106.68	6	\$640.08
Prepare and submit report	0.10	1.00	0.30	1.40	\$91.77	\$5.20	\$96.97	6	\$581.82
<b>Subtotal:</b>					\$198.45	\$5.20	\$203.65	6	\$1,221.90
<b>Small U.S. Exporters</b>									
Research specific export information	0.00	0.50	0.50	1.00	\$70.08	\$0.00	\$70.08	6	\$420.48
Prepare and submit report	0.10	0.50	0.50	1.10	\$80.79	\$5.20	\$85.99	6	\$515.94
<b>Subtotal:</b>					\$150.87	\$5.20	\$156.07	6	\$936.42
<b>Total for Exporters:</b>									\$2,158.32
<b>EPA</b>									
Receive and record report	0.00	0.10	0.50	0.60	\$24.64	\$0.00	\$24.64	12	\$295.68
<b>Total for EPA:</b>	0.00	0.10	0.50	0.60	\$24.64	\$0.00	\$24.64	12	\$295.68
<b>TOTAL: (for both Exporters &amp; EPA)</b>									\$2,454
<b>NOTES:</b>									
<sup>a</sup> Based on hourly burden estimates discussed in Section 3.3 of EIA (*).									
<sup>b</sup> Based on hourly labor rates discussed in Section 3.2 of EIA.									
<sup>c</sup> Based on material costs discussed in Section 3.4 of EIA.									
<sup>d</sup> Based on universe assumptions discussed in Section 3.1 of EIA, which reveal a total of approximately 12 CRT Recycling Exporters in the U.S. And, we assume there is a 50/50 Percent Ratio regarding the total number of Large vs. Small U.S. CRT Exporters, such that there are 6 of each type in the above calculations.									
(*) See Exhibit 1.									



## Exhibit 3

**Costs for Meeting Proposed Reuse & Recycling Notification Changes  
(Asking for minor additional information)**

Activity	Cost per Notice							Number of Entities <sup>e</sup>	Cost of All Notices	
	Manager Staff Hours <sup>a</sup>	Technical Staff Hours <sup>a</sup>	Clerical Staff Hours <sup>a</sup>	Total Hours <sup>b</sup> (10% of Orig. Hours)	Total Labor Cost <sup>c</sup>	Total Material Costs <sup>d</sup>	Total Cost per Notice		Estimated Number of Notices <sup>f</sup>	Total Cost
<b>U.S. Exporters</b>										
Prepare& submit notification <b>Subtotal for Exporters:</b>	0.00	1.50	0.00	0.15	\$10.51	\$0.00	\$10.51	138	233 to 435	<b>\$2,449 to \$4,572</b>
<b>EPA</b>										
Receive and process notification	0.00	1.00	0.00	0.10	\$6.32	\$0.00	\$6.32	138	233 to 435	\$1,473 to \$2,749
Prepare and transmit confirmation of receipt to U.S.	0.00	0.00	0.25	0.025	\$0.92	\$0.00	\$0.92	138	233 to 435	\$213 to \$398
Forward notification to the competent authorities of the countries of import and transit	0.00	0.00	0.16	0.016	\$0.59	\$0.00	\$0.59	138	233 to 435	\$137 to \$255
Receive and process Acknowledgement of Receipt from the competent authority of the country of import	0.00	0.00	0.25	0.025	\$0.92	\$0.00	\$0.92	138	233 to 435	\$213 to \$398
Receive and process consent/objection from the competent authorities of the countries of import and	0.00	0.00	0.16	0.016	\$0.59	\$0.00	\$0.59	138	233 to 435	\$137 to \$255
Forward written Acknowledgement of Consent or objection to U.S. exporter	0.00	0.00	0.25	0.025	\$0.92	\$0.00	\$0.92	138	233 to 435	\$213 to \$398
<b>Subtotal for EPA:</b>	0.00	1.00	1.07	0.207	\$10.26	\$0.00	\$10.26	138	233 to 435	<b>\$2,386 to \$4,453</b>
<b>Total for both Exporters &amp; EPA</b>	0.00	2.50	1.07	0.357	\$20.77	\$0.00	\$20.77	138	233 to 435	<b>\$4,835 to \$9,025</b>

Notes:

<sup>a</sup> Staff level hourly burden estimates are discussed in Section 3.3 of EIA (\*).

<sup>b</sup> Total final hourly burden estimates are conservatively assumed to only involve an additional burden equal to 10% of the overall burden from the notification requirements under the current CRT Rule.

<sup>c</sup> Based on hourly labor rates discussed in Section 3.2 of EIA.

<sup>d</sup> Since entities are already required to submit Recycling and Reuse Notices, the effected entities face no additional costs associated with mailings, copies, facsimiles, etc. due to the newly proposed modifications to the existing notices.

<sup>e</sup> The projections for the total number of entities potentially impacted by the rule are discussed in Section 3.1 of EIA.

<sup>f</sup> The projections for the total number of notifications that may be submitted annually is discussed in Section 3.5 of EIA.

(\*) See Exhibit 1.

