

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 0976.17  
“2015 HAZARDOUS WASTE REPORT, NOTIFICATION OF  
REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS  
WASTE PERMIT APPLICATION AND MODIFICATION”**

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Office of Resource Conservation and Recovery  
United States Environmental Protection Agency  
Washington, D.C. 20460

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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 “2015 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” EPA ICR Number 0976.17.

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

This is a request to renew a currently approved ICR of the U.S. Environmental Protection Agency (EPA): “2013 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” EPA ICR Number 0976.16 (OMB Control Number 2050-0024). The ICR addresses the following requirements:

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

EPA integrated the above requirements into this ICR to ensure consistency and minimize duplication in its burden assumptions and estimates, given that all three requirements address some of the same reporting elements. In particular, all three requirements address the use of the RCRA Subtitle C Site Identification Form (i.e., the Site ID Form). Specifically, the Hazardous

Waste Report addresses the requirement for large quantity generators (LQGs)<sup>1</sup> and TSDFs to prepare and submit the Site ID Form as part of their Hazardous Waste Report. The notification addresses the requirement for all regulated entities to submit the Site ID Form (or alternative document, if specified) to notify EPA or the authorized State of regulated waste activity. The Part A Permit Application addresses the requirement for all owner/operators of TSDFs to submit the Site ID Form as part of their Part A Permit Applications or Part A Permit Modifications. Incorporating these three requirements into this ICR has allowed EPA to more comprehensively estimate the burden of the Site ID Form and other collections, ensure consistency and nonduplication in its analysis, and address changes to the Site ID Form.

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

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

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

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

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

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

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

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

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

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

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

EPA promulgated regulations at 40 CFR 270.1 requiring owners or operators of TSDFs to submit a Part A Permit Application. EPA needs information contained in the Part A Permit

Application to identify the person(s) legally responsible for hazardous waste activity, to determine which facilities require permits under more than one program, to assess potential for the facility to pollute nearby ground and surface waters, to identify the time frame available for EPA to process permit applications, and to define the specific wastes a facility is legally allowed to handle for different purposes.

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

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

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

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

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

EPA compiles and publishes the *National Biennial RCRA Hazardous Waste Report* based on the data for each odd number reporting year. The reports for 1991 to 2013 are available on the Internet at <http://www.epa.gov/waste/inforesources/data/biennialreport/index.htm>.

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

- Describing the various source activities that generate hazardous waste and the generated waste types and quantities.
- Describing the management methods by which the waste is treated, disposed, or recycled and the quantities managed by each method.

- Providing information for analysis of trends in waste generation, waste treatment and disposal, recycling, and source reduction.
- Understanding how much waste a State receives from out of State or sends out of State.
- Estimating available capacity for treating, recycling, and disposing hazardous wastes.

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

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

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

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

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

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

- Set priorities for processing permit applications;

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

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



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

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

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

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

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

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on June 18, 2014 (79 *FR* 34733). The notice indicated that EPA was planning to submit an ICR, “2015 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification” (EPA ICR No. 0976.17, OMB Control No. 2050–0024), to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act. The notice also requested comments on the information collection and burden estimates covered in the ICR. The public comment period extended through August 18, 2014. EPA received no comments on this ICR in response to the *Federal Register* notice.

#### **3(c) CONSULTATIONS**

Most of the data and assumptions in this ICR are based on EPA consultations with industry and States, or data from the Resource Conservation and Recovery Act Information (RCRAInfo) system<sup>2</sup>. In developing this current ICR, EPA carefully reviewed all of the ICR's data and assumptions and determined that a few should be strengthened based on additional consultations. Specifically, EPA conducted consultations on the ICR's assumptions regarding respondents' hourly burden for completing and submitting Hazardous Waste Reports, Notifications of Regulated Waste Activity, and Part A Permit Applications.

Table 1 identifies the organizations contacted.

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<sup>2</sup> RCRAInfo is a national database used by EPA to track entities regulated under Subtitle C of RCRA (i.e., hazardous waste handlers). RCRAInfo includes data on general handler information, waste generation and management, permit or closure status, compliance with Federal and State regulations, and cleanup activities.

**Table 1**  
**Organizations EPA Contacted during the Development of this ICR**  
**(September-October 2014)**

Organization	Contact Name	Phone Number	Email Address
<b>Industry</b>			
Clean Harbors	Stephen Bley	(513) 823-2284	bleys@cleanharbors.com
Ineos USA	Chad Ulm	Not Available	chad.ulm@ineos.com
Milestone AV Technologies	Jason Showell	(513) 489-3222	jason.showell@milestone.com
Retriev Technologies	Annabella Troiano	(740) 653-6290	atroiano@retrievtech.com
Ross Incineration Services	Susan Kaiser	(440) 748-5847	skaiser@rossenvironmental.com
Rush-Presbyterian-St. Luke's Medical Center	Eric Sondergaard	(312) 942-7233	Not Available
Safety Clean	Kelly Dale Taylor	(608) 298-6420	kelly.d.taylor@safety-kleen.com
US Ecology	Noel Bailey	(208) 834.2275 Ext. 2314	noel.bailey@usecology.com
US Ecology (Envirite)	Colletta Campbell	(708) 596-7040	Not Available
<b>State Agencies</b>			
Idaho Department of Environmental Quality	Rene Anderson	(208) 373-0210	Rene.Anderson@deq.idaho.gov
Illinois Environmental Protection Agency	Hope Wright	(217) 785-2361	Hope.Wright@Illinois.gov
Ohio Environmental Protection Agency	Paula Canter	(614) 644-2917	paula.canter@epa.ohio.gov
South Dakota Department of Environment & Natural Resources	Dustin Witt	(605) 773-3153	Dustin.Witt@state.sd.us

The following paragraphs summarize the feedback obtained on the burden associated with various information collection activities.

**(1) Hazardous Waste Report**

**(a) Industry**

- **Prepare Site ID Form of the Hazardous Waste Report using blank form.** EPA was informed by the majority of consultants that the ICR's original burden for preparing the Site ID Form of the Hazardous Waste Report using a blank form (i.e., 1 hour per facility) was a reasonable estimate. However, some consultants provided a longer duration for the burden estimate, which ranged from 2 to 3 hours. Based on the consultation information,

EPA re-estimated the burden for preparing the Site ID Form of the Hazardous Waste Report using a blank form to 1.26 hours per facility.

- ***Prepare Site ID Form of the Hazardous Waste Report using pre-populated form.*** EPA was informed by the majority of consultants that the ICR's original burden for preparing the Site ID Form of the Hazardous Waste Report using a pre-populated form (i.e., 20 minutes per facility) was a reasonable estimate. However, some consultants provided a longer duration for the burden estimate, which ranged from 1 to 2.5 hours. Based on the consultation information, EPA re-estimated the burden for preparing the Site ID Form of the Hazardous Waste Report using a pre-populated form to be 0.61 hours per facility.

**(b) State Agencies**

- **Distribute and collect Hazardous Waste Report forms and instructions.** EPA received mixed feedback about the ICR's original burden for distributing and collecting the Hazardous Waste Report forms and instructions (i.e., 46 minutes per facility) from the four State agencies contacted. Two State agencies indicated that the ICR's original burden estimate was a realistic national average, while the other two State agencies disagreed with the burden estimate. Suggested burden estimates ranged from less than one minute to 1.53 hours. Based on the State information, EPA re-estimated the burden for distributing and collecting the Hazardous Waste Report forms and instructions to be 0.77 hour per facility.
- **Assisting respondents.** EPA received mixed feedback about the ICR's original burden for assisting respondents (i.e., 1 hour and 1 minute per facility) from the four State agencies contacted. Two State agencies indicated that the ICR's original burden estimate was a realistic national average, while the other two State agencies disagreed with the burden estimate. Suggested burden estimates ranged from one minute to 1.08 hours. Based on the State information, EPA re-estimated the burden for assisting respondents to be 0.78 hour per facility.
- **Key entry of report submissions that were not submitted electronically.** EPA was informed by the majority of consultants that the ICR's original burden for key entering report submissions that were not submitted electronically (i.e., 21 minutes per facility) was a reasonable estimate. However, some consultants provided a shorter duration. The suggested burden estimate was 6.9 minutes. Based on the consultation information, EPA re-estimated the burden for key entering report submissions that were not submitted electronically to be 0.31 hour per facility.
- **Perform quality assurance.** EPA was informed by some of the consultants that the ICR's original burden for performing quality assurance (i.e., 20 minutes per facility) was a reasonable estimate. However, one consultant provided a longer duration. The suggested burden estimate was 25 minutes. Based on the consultation information, EPA re-estimated the burden for performing quality assurance to be 0.37 hour per facility.

## (2) Notification of Regulated Waste Activity

### (a) Industry

- **Complete and submit initial notification using a blank Site ID Form.** EPA was informed by some of the consultants that the ICR's original burden for completing and submitting an initial notification using a blank Site ID Form (i.e., 1 hour per facility) was a realistic industry average. However, some consultants provided a longer duration. The suggested burden estimate was 2 hours. Based on the consultation information, EPA re-estimated the burden for completing and submitting an initial notification using a blank Site ID Form to be 1.09 hours per facility.
- **Complete and submit subsequent notification using a blank Site ID Form.** EPA was informed by some consultants that the ICR's original burden for completing and submitting a subsequent notification using a blank Site ID Form (i.e., 40 minutes per facility) was a realistic industry average. However, some consultants provided longer durations. Suggested burden estimates ranged from 1 hour to 2 hours. Based on the consultation information, EPA re-estimated the burden for completing and submitting a subsequent notification using a blank Site ID Form to be 0.83 hour per facility.
- **Complete and submit subsequent notification using a previously submitted Site ID Form.** EPA was informed by some consultants that the ICR's original burden for completing and submitting a subsequent notification using a previously submitted Site ID Form (i.e., 20 minutes per facility) was a realistic industry average. However, some consultants provided longer duration times. Suggested burden estimates ranged from 40 minutes to 1 hour. Based on the consultation information, EPA re-estimated the burden for completing and submitting an initial notification using a blank Site ID Form to be 0.45 hour per facility.

### (b) State Agencies

- **Review initial notification submitted using Site ID Form.** EPA was informed by all State agencies contacted that the ICR's original burden for reviewing an initial notification submitted using a Site ID Form (i.e., 15 minutes per facility) was a realistic national average. Based on the consultation information, the average burden for reviewing an initial notification submitted using a Site ID Form remained at 0.25 hour per facility.
- **Enter initial notification information into RCRAInfo.** EPA received mixed feedback about the ICR's original burden for entering initial notification information into RCRAInfo (i.e., 2 hours and 15 minutes per facility) from the four State agencies contacted. Two State agencies indicated that the ICR's original burden estimate was a realistic national average, while the other two State agencies disagreed with the burden estimate. Suggested burden estimates ranged from 15 minutes to 1.25 hours. Based on the consultation information, EPA re-estimated the burden for entering initial notification information into RCRAInfo to be 1.50 hours per facility.

- **Generate EPA Identification Number and send EPA Identification Number to facility.** EPA was informed by most States that the ICR's original burden for generating an EPA Identification Number and sending the EPA Identification Number to a facility (i.e., 30 minutes per facility) was a realistic national average. However, one State provided a revision to this burden estimate. The suggested burden estimate was 7 minutes. Based on the consultation information, EPA re-estimated the burden for generating an EPA Identification Number and sending the EPA Identification Number to a facility to be 0.42 hour per facility.
- **Review subsequent notification submitted using Site ID Form.** EPA was informed by all State agencies contacted that the ICR's original burden for reviewing a subsequent notification submitted using a Site ID Form (i.e., 15 minutes per facility) was a realistic national average. Based on the consultation information, the average burden for reviewing a subsequent notification submitted using a Site ID Form remained at 0.25 hour per facility.
- **Enter subsequent notification information into RCRAInfo.** EPA received mixed feedback about the ICR's original burden for entering subsequent notification information into RCRAInfo (i.e., 2 hours and 15 minutes per facility) from the four State agencies contacted. Two State agencies indicated that the ICR's original burden estimate was a realistic national average, while the other two State agencies disagreed with the burden estimate. Suggested burden estimates ranged from 10 minutes to 1.25 hours. Based on the consultation information, EPA re-estimated the burden for entering subsequent notification information into RCRAInfo to be 1.49 hours per facility.

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

#### (a) **Industry**

- **Read the regulations and instructions.** EPA was informed by most of the industry consultants that the ICR's original burden for reading the regulations and instructions (i.e., 6 hours per facility) was a realistic industry average. However, some consultants provided revisions to this burden estimate, ranging from 10 hours to 15 hours. Based on the consultation information, EPA re-estimated the burden for reading the regulations and instructions to be 7.13 hours per facility.
- **Prepare Hazardous Waste Permit Information Form.** EPA was informed by most industry consultants that the ICR's original burden for preparing the Hazardous Waste Permit Information Form (i.e., 12 hours and 30 minutes per facility) was a realistic industry average. However, one consultant provided a revision to this burden estimate. The suggested burden estimate was 30 hours. Based on the consultation information, EPA re-estimated the burden for preparing a Hazardous Waste Permit Information Form to be 15.45 hours per facility.

- ***Obtain signatures and certifications for Part A Permit Application, reports, and other information requested by EPA.*** EPA was informed by all organizations contacted that the ICR's original burden for obtaining signatures and certifications for Part A Permit Application, reports, and other information requested by EPA (i.e., 2 hours and 30 minutes per facility) was a realistic industry average. Based on the consultation information, the average burden for obtaining signatures and certifications for Part A Permit Application, reports, and other information requested by EPA remained at 2.5 hours per facility.
- ***Obtain a new authorization for invalid authorizations.*** EPA was informed by all organizations contacted that the ICR's original burden for obtaining a new authorization for invalid authorizations (i.e., 2 hours per facility) was a realistic industry average. Based on the consultation information, the average burden for obtaining a new authorization for invalid authorizations remained at 2 hours per facility.
- ***Submit Part A Permit Application and reports.*** EPA was informed by all organizations contacted that the ICR's original burden for submitting a Part A Permit Application and reports (i.e., 3 hours per facility) was a realistic industry average. Based on the consultation information, the average burden for submitting a Part A Permit Application and reports remained at 3 hours per facility.
- ***Explain or cure an alleged deficiency in Part A Permit Application, if required.*** EPA was informed by most industry consultants that the ICR's original burden for explaining or curing an alleged deficiency in a Part A Permit Application (i.e., 3 hours and 30 minutes per facility) was a realistic industry average. However, some of the consultants provided longer durations, which ranged from 10 hours to 40 hours. Based on the consultation information, EPA re-estimated the burden for explaining or curing an alleged deficiency in a Part A Permit Application to be 5.37 hours per facility.

**(b) State Agencies**

- ***Review Part A Permit Applications.*** EPA was informed by all State agencies contacted that the ICR's original burden for reviewing a Part A Permit Application (i.e., 3 hours and 15 minutes per facility) was a realistic national average. Based on the consultation information, the average burden for reviewing a Part A Permit Application remained at 3.25 hour per facility.
- ***Ensure that Part A Permit Application and reports have been signed by appropriate person.*** EPA was informed by all State agencies contacted that the ICR's original burden for ensuring that a Part A Permit Application and reports have been signed by the appropriate person (i.e., 15 minutes per facility) was a realistic national average. Based on the consultation information, the average burden for ensuring that a Part A Permit Application and reports have been signed by the appropriate person remained at 0.25 hour per facility.

- **Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility.** EPA was informed by some consultants that the ICR's original burden for reviewing newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility (i.e., 15 minutes per facility) was a realistic national average. However, one consultant provided a revision to this burden estimate. The suggested burden estimate was 30 minutes. Based on the consultation information, EPA re-estimated the burden for reviewing newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility to be 0.32 hour per facility.
- **Review signature certifications.** EPA was informed by all State agencies contacted that the ICR's original burden for reviewing signature certifications (i.e., 15 minutes per facility) was a realistic national average. Based on the consultation information, the average burden for reviewing signature certifications remained at 0.25 hour per facility.
- **Enter Part A Permit Application information into RCRAInfo.** EPA was informed that the ICR's original burden for entering Part A Permit Application information into RCRAInfo (i.e., 1 hour per facility) was a realistic national average. Based on the consultation information, the average burden for entering Part A Permit Application information into RCRAInfo remained at 1 hour per facility.
- **Notify applicant of deficiency in the Part A Permit Application.** EPA received mixed feedback about the ICR's original burden for notifying an applicant of a deficiency in the Part A Permit Application (i.e., 36 minutes per facility) from the four State agencies contacted. Two State agencies indicated that the ICR's original burden estimate was a realistic national average, while the other two State agencies disagreed with the burden estimate. The suggested burden estimate was 1 hour. Based on the consultation information, EPA re-estimated the burden for notifying an applicant of a deficiency in the Part A Permit Application to be 0.81 hour per facility.

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

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

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

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

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

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

New hazardous waste generators, transporters, or TSDs must submit EPA Form 8700-12 (i.e., the Site ID Form) and obtain an EPA Identification Number prior to treating (including recycling), storing, transporting, offering for transport, or disposing of hazardous waste. Existing hazardous waste generators, transporters, or TSDs are required to notify the Agency of their hazardous waste activity(ies) not later than 90 days after the promulgation or revision of regulations in 40 CFR Part 261 (identification and listing of hazardous wastes). Owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities. Under Section 273.32(a), large quantity handlers of universal waste must submit a written, one-time notification of universal waste management to the Regional Administrator and obtain an EPA Identification Number before meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3). Under sections 279.42, 279.51, 279.62 and 279.73, used oil handlers who have not previously complied with the notification requirement (under 40 CFR Part 266, Subpart E) must submit a written, one-time notification of used oil management activities and obtain an EPA Identification Number. Any reduction in the frequency of this information collection would prevent the Agency from meeting the statutory requirements of RCRA Section 3010.

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

A respondent's provision of information on a Part A Permit Application is essentially a one-time exercise that must occur when a facility is new or if an existing facility becomes subject to new permitting requirements. Subsequent revisions to the Part A Permit Application are necessary only if an interim status facility changes its ownership and/or process or management of wastes. EPA strongly believes that if the minimum requirements specified under the regulations are not met, neither the facilities nor EPA can ensure that hazardous wastes are being properly managed, and do not pose a serious threat to human health and the environment.

### **3(e) GENERAL GUIDELINES**

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, applicable OMB guidance, and EPA's ICR Handbook. In addition, this information collection complies with EPA's Data Standards and Information Quality Guidelines.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Hazardous Waste Report consists of four forms: RCRA Subtitle Site Identification Form (Site ID Form), Waste Generation and Management (Form GM), Waste Received from Off-Site (Form WR), and Off-Site Identification (Form OI; used only by States). Only LQGs and TSDFs are required to complete the Hazardous Waste Report.

As with most of the RCRA program, the Hazardous Waste Report data collection process is delegated to the States. States provide respondents with either the Federal form or a State equivalent, collect the responses, contact non-respondents, enter the data (or load files if the

State employs electronic methods for preparation and submittal of reports by regulated entities) into RCRAInfo using off-the-shelf software packages which have been developed to support the collection of Hazardous Waste Report data, assure data quality, and forward the data to EPA.

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

(i) Data Items:

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

(ii) Respondent Activities:

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

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

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

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

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

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

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

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

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

(i) Data Items:

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

(ii) Respondent Activities:

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

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

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

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

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

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

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

(i) Data Item:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

- Complete and submit EPA Form 8700-12.

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

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.
- Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

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

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

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

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

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

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

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

**(i) Data Items:**

- Notification, using EPA Form 8700-12, with the following fields filled out, at a minimum:
  - Reason for submittal;
  - Site EPA Identification Number (except for CESQGs);
  - Site name;
  - Site location information;

- Site land type;
  - North American Industry Classification System (NAICS) code(s) for the site;
  - Site mailing address;
  - Site contact person;
  - Operator and legal owner of the site;
  - Type of regulated waste activity; and
  - Certification.
- A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(d).
  - A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(e).

(ii) Respondent Activities:

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

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

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

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

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

40 CFR 262.204(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification



Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is withdrawing from the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K.

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

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

(i) Data Items:

- A Site ID Form with the following fields filled out, at a minimum:
  - Reason for submittal;
  - Site EPA Identification Number (except for CESQGs);
  - Site name;
  - Site location information;
  - Site land type;
  - North American Industry Classification System (NAICS) code(s) for the site;
  - Site mailing address;
  - Site contact person;
  - Operator and legal owner of the site;
  - Type of regulated waste activity; and
  - Certification.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

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

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

**(i) Data Items:**

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

Or

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

- EPA Form 8700-12
  - Review completed EPA Form 8700-12.
  - Enter EPA Form 8700-12 information into RCRAInfo.
  - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

Or

- Letter
  - Review letter requesting EPA Identification Number.
  - Enter letter information into RCRAInfo.
  - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

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

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

(i) Data Items:

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

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

Or

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

- EPA Form 8700-12
  - Review completed EPA Form 8700-12.
  - Enter EPA Form 8700-12 information into RCRAInfo.
  - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

Or

- Letter
  - Review letter requesting EPA Identification Number.
  - Enter letter information into RCRAInfo.
  - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

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

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

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

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

##### **(i) Data Items:**

- A list of the activities conducted by the applicant that require the owner or operator to obtain a RCRA permit.
- Name, mailing address, and location, including latitude and longitude of the facility for which the application is submitted.
- Up to four NAICS codes that best reflect the principal products or services provided by the facility.
- Operator's name, address, telephone number, ownership status, and status as Federal, State, private, public or other entity.
- Name, address, and phone number of the owner of the facility.
- Whether the facility is located on Indian lands.
- An indication of whether the facility is new or existing and whether it is a first or revised application.
- For existing facilities, the following information:
  - A scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas and
  - Photographs of the facility clearly delineating all existing structures; existing treatment, storage and disposal areas; and sites of future treatment, storage, and disposal areas;
- A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items.
- A specification of the hazardous wastes listed or designated under 40 CFR Part 261 to be treated, stored, or disposed of at the facility; an estimate of the quantity of such wastes to be treated, stored, or disposed annually; and a general description of the processes to be used for such wastes.

- A listing of all permits or construction approvals received or applied for under any of the following programs:
  - Hazardous Waste Management program under RCRA
  - Underground Injection Control (UIC) Program under the Safe Drinking Water Act (SDWA)
  - National Pollutant Discharge Elimination System (NPDES) program under the Clean Water Act (CWA)
  - Prevention of Significant Deterioration (PSD) program under the Clean Air Act (CAA)
  - Nonattainment program under the CAA
  - National Emission Standards for Hazardous Air Pollutants (NESHAPS) preconstruction approval under the CAA
  - Ocean dumping permits under the Marine Protection Research and Sanctuaries Act
  - Dredge or fill permits under section 404 of the CWA
  - Other relevant environmental permits, including State permits.
  
- A topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the source, depicting the following aspects of the facility:
  - Each of its intake and discharge structures;
  - Each of its hazardous waste treatment, storage, or disposal facilities;
  - Each well where fluids from the facility are injected underground; and
  - Wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.
  
- A brief description of the nature of the business.
  
- For hazardous debris, a description of the debris category(ies) and containment category(ies) to be treated, stored, or disposed of at the facility.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

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

(i) Data Items:

- Signatures required on Part A Permit Applications:
  - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
  - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
  - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).
  
- Signatures for reports required by permits and other information requested by the Director:
  - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
  - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
  - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).
  - Signature of a duly authorized representative of one of the persons listed above as defined at 40 CFR 270.11(b).
  
- New authorization satisfying the requirements of 40 CFR 270.11(b) if an authorization under 40 CFR 270.11(b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Data items for this requirement are the same as those under 40 CFR 270.11(b).
  
- Certification:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

(a3) *Submittal of Part A Permit Application*

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

(i) Data Items:

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

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

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



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

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

(i) Data Items:

- Part A application using EPA Form 8700-23.

(ii) Respondent Activities:

**Facilities** must perform the following activities:

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

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

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

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

### 5(a) AGENCY ACTIVITIES

#### (1) Hazardous Waste Report

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

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

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

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

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

EPA activities for the Hazardous Waste Report include the following:

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

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

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

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

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

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

- **Prepare the national report.** EPA Headquarters will prepare *The National Biennial RCRA Hazardous Waste Report* that will be made available to the Congress and the public by December 2014.
- **Store the data.** The Hazardous Waste Reports will be stored by the EPA Regions for three years and may be maintained by each Region. RCRAInfo is maintained by EPA Headquarters.

## (2) Notification of Regulated Waste Activity

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**5(d) COLLECTION SCHEDULE**

**(1) Hazardous Waste Report**

EPA’s 2015 Hazardous Waste Report national implementation schedule is outlined in Table 2.

**Table 2  
2015 Hazardous Waste Report National Implementation Schedule**

Activity	Tentative Completion Date
Facilities submit completed forms to Regions/States	March 2016
Regions/States begin loading the data into RCRAInfo	April 2016
Regions/States complete data loads	July 2016
EPA Headquarters publishes Preliminary 2015 National Biennial data summaries	August 2016
Last day to request a State Summary Report from EPA Headquarters	October 2016
Regions/States complete loading corrected (if necessary) data into RCRAInfo	November 2016
EPA Headquarters makes Final 2015 National Biennial data available on RCRAInfo Web (public Web site)	December 2016

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

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

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

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

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

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

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

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

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

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

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of the formal written affiliation agreement with a college

or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

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

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

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

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

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

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

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

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

**(a) Part A Permit Application**

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



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

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

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

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

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

### 6(a) ESTIMATING RESPONDENT BURDEN HOURS

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

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

#### (1) Hazardous Waste Report

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

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

EPA estimates the burden for updating a pre-populated Site ID Form to be about 37 minutes (0.61 hour) per respondent and the burden for completing a Site ID Form in its entirety (i.e., completing a blank form manually) to be 1.26 hour per respondent.

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 3 below. EPA multiplied the percentage of pre-populated Site ID Forms by the average burden for updating the information contained in the form. EPA also multiplied the percentage of blank Site ID Forms by the average burden for completing the blank form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 3**  
**Assumptions and Weighted-Average Equation Used in Estimating Burden to Complete the Site Identification Form of the Hazardous Waste Report**

Assumptions	Weighted-Average Equation
0.61 hours to complete pre-populated form; 65 percent of the forms are pre-populated	$(0.61 \text{ hr} \times 0.65) + (1.26 \text{ hrs} \times 0.35)$ $= 0.84 \text{ hours}$
1.26 hour to complete blank form; 35 percent of the forms are blank	

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

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

To estimate the percentage of facilities that submit Forms GM and WR electronically, EPA used information gained from consultations and 2011 Hazardous Waste Report data. For Form GM submissions, EPA estimated that, based on consultations and best professional judgment, facilities submitting five (5) or more Forms GM for the Hazardous Waste Report are likely to do so electronically. Using 2011 Hazardous Waste Report data<sup>3</sup>, EPA identified sites submitting Forms GM, counted their Forms GM submitted, and calculated the percentage that their Forms GM represented of the total number of Forms GM. Based on this methodology, EPA estimates that 94 percent of Forms GM are submitted electronically, while the remaining 6 percent are sent manually.

For Forms WR, EPA believes that TSDFs receiving large numbers of off-site shipments are more likely to have systems in place to track waste stream data, and as a consequence, to submit Hazardous Waste Report data electronically. Using 2011 Hazardous Waste Report data<sup>4</sup>, EPA reviewed the list of Forms WR reported to the Hazardous Waste Report by facility and, based on its own professional judgment and consultations, estimates that 100 percent of Forms WR are submitted electronically.

To estimate the average burden per respondent in preparing a Form GM or WR, EPA used the weighted-average calculations in Table 4. EPA multiplied the percentage of both forms submitted electronically by their respective burden for electronic reporting and the percentage of both forms submitted manually by their respective burden for manual reporting. Then, EPA added the two products for each form, respectively, to calculate an overall weighted-average burden for both forms.

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<sup>3</sup> 2011 Hazardous Waste Report (i.e., 2011 Biennial Report) data used in this analysis are current as of July 10-14, 2014.

<sup>4</sup> Ibid.

**Table 4**  
**Assumptions and Weighted-Average Equations Used in Estimating Burden to Complete Form GM and Form WR of the Hazardous Waste Report**

Activity	Assumptions	Weighted-Average Equation
Complete Form GM	0.27 hour to complete electronically; 94 percent of the forms are completed electronically  1.19 hours to complete manually; 6 percent of the forms are completed manually	$(0.27 \text{ hr} \times 0.94) + (1.19 \text{ hrs} \times 0.06)$ $= 0.32 \text{ hour}$
Complete Form WR	0.12 hour to complete electronically; 100% of the forms are completed electronically	$0.12 \text{ hr} \times 1$ $= 0.12 \text{ hour}$

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

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

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

EPA estimates the burden for completing a blank Site ID Form under section 260.42 to be 1.33 hours per respondent and the burden for using a previously submitted form to be 0.95 hours per respondent. EPA notes that section 260.42 imposes several substantive requirements specific to the exclusions that must be completed (e.g., quantity of secondary material to be managed annually) in addition to the rest of the Site ID Form.

For the notification submitted indicating that the hazardous secondary materials are no longer managed in accordance to the exclusion, EPA estimates the average hourly burden for completing the Site ID Form in its entirety (i.e., a blank form) to be about 50 minutes (0.83 hour) per respondent. EPA also estimates the average hourly burden for updating the most recently submitted Site ID Form to be 27 minutes (0.45 hour) per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 5 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 5  
Assumptions and Weighted-Average Equation  
Used in Estimating Burden to Complete the Notification of  
Hazardous Secondary Material Activity under 40 CFR 260.42**

Assumptions	Weighted-Average Equation
<b>Notification Prior to Operating under Exclusion AND Notification Submitted by March 1 of Each Even Numbered Year Thereafter</b>	
1.33 hours to complete blank form; 50 percent of the facilities	$(1.33 \text{ hrs} \times 0.50) + (0.95 \text{ hr} \times 0.50)$ = 1.14 hours
0.95 hour to update most recently submitted form; 50 percent of the facilities	
<b>Notification Indicating that Hazardous Secondary Materials are no Longer Managed in Accordance to the Exclusion</b>	
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ = 0.64 hour
0.45 hour to update most recently submitted form; 50 percent of the facilities	

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

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

EPA estimates the burden for completing a blank Site ID Form under Subpart K to be 50 minutes (0.83 hour) per respondent and the burden for using a previously submitted form to be 27 minutes (0.45 hour) per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 6 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 6**  
**Assumptions and Weighted-Average Equation**  
**Used in Estimating Burden to Complete the Notification of**  
**Hazardous Waste Activity under 40 CFR Part 262, Subpart K**

Assumptions	Weighted-Average Equation
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ $= 0.64 \text{ hour}$
0.45 hour to update most recently submitted form; 50 percent of the facilities	

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

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

EPA estimates the burden for completing a blank Site ID Form to be 50 minutes (0.83 hour) per respondent and the burden for using a previously submitted form to be 27 minutes (0.45 hour) per respondent.

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

**Table 7**  
**Assumptions and Weighted-Average Equation Used in**  
**Estimating Burden to Complete Other Notifications Covered in this ICR**

Assumptions	Weighted-Average Equation
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ $= 0.64 \text{ hour}$
0.45 hour to update most recently submitted form; 50 percent of the facilities	

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

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

EPA estimates the burden for completing a blank Site ID Form to be 1.26 hour per respondent and the burden for using a previously submitted form to be 37 minutes (0.61 hour) per respondent.

The above burden estimates are reflected in Exhibit 3 as weighted-averages. EPA derived the weighted averages using the calculations in Table 8 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

**Table 8**  
**Assumptions and Weighted-Average Equation Used in Estimating**  
**Burden to Complete the Site Identification Form of the Part A Permit Application**

Assumptions	Weighted-Average Equation
1.26 hour to complete blank form; 50 percent of the facilities	$(1.26 \text{ hrs} \times 0.50) + (0.61 \text{ hr} \times 0.50)$ $= 0.94 \text{ hour}$
0.61 hour to update most recently submitted form; 50 percent of the facilities	

## **6(b) ESTIMATING RESPONDENT COSTS**

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

### **(1) Labor Costs**

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

#### **(a) Private Sector Facilities**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$129.82 for legal staff, \$76.73 for managerial staff, \$57.16 for technical staff, and \$34.39 for clerical staff. These respondent labor costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.16, dated September 19, 2012), and updated to 2014 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.<sup>5</sup>

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

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$60.57 for legal staff, \$56.86 for managerial staff, \$34.02 for technical staff, and \$21.70 for clerical staff. These respondent labor costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.16, dated September 19, 2012), and updated to 2014 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.<sup>6</sup>

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

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

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<sup>5</sup> Bureau of Labor Statistics, "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry," *Employment Cost Index Historical Listing – Volume V*, April 2014. Available online at: <http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on July 14, 2014. Civilian Workers, All Workers, June 2012=116.8 March 2014=120.5.

<sup>6</sup> Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," *Employment Cost Index Historical Listing – Volume V*, April 2014. Available online at: <http://www.bls.gov/web/eci/ecicois.pdf>, last accessed on July 14, 2014. State and Local Government Workers, All Workers, June 2012=118.6 and March 2014=122.8.



### (3) Operation and Maintenance Costs

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

- EPA estimates that facilities submitting a Hazardous Waste Report or a Part A Permit Application to EPA or States will incur a cost of \$6.51 to mail an 11-ounce large envelope by certified mail (\$3.08 for postage, \$3.30 for the certified-mail fee, and \$0.13 for a catalog envelope).<sup>7, 8, 9</sup>
- EPA estimates that facilities submitting a notification to EPA will incur a cost of \$3.82 to mail a one-ounce letter by certified mail (i.e., \$0.49 for first-class letter postage, \$3.30 for the certified-mail fee, and \$0.03 for standard business envelope).<sup>10, 11, 12</sup>
- EPA estimates that State agencies distributing the Hazardous Waste Report to facilities will incur a cost of \$3.21 to mail an 11-ounce large envelope (\$3.08 for postage and \$0.13 for a catalog envelope).<sup>13, 14</sup>

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

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

EPA estimates the Agency hour and cost burden associated with the information collection requirements covered in this ICR in Exhibits 4 through 6. As shown in the exhibits, EPA estimates an average hourly labor cost of \$87.42 for legal staff (GS15, Step 5), \$77.14 for managerial staff (GS-15, Step 1), \$55.50 for technical staff (GS-13, Step 1), and \$23.68 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General

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<sup>7</sup> U.S. Postal Service, "First-Class Mail." Available online at: <https://www.usps.com/business/prices.htm>, last accessed on July 14, 2014.

<sup>8</sup> U.S. Postal Service, "Add Extra Services for Business." Available online at: <https://www.usps.com/business/add-extra-services.htm>, last accessed on July 14, 2014.

<sup>9</sup> Catalog envelope cost based on current market price, as of July 14, 2014 (i.e., box of 100 catalog envelopes with gummed closure at \$13.29).

<sup>10</sup> U.S. Postal Service, "First-Class Mail." Available online at: <https://www.usps.com/business/prices.htm>, last accessed on July 14, 2014.

<sup>11</sup> U.S. Postal Service, "Add Extra Services for Business." Available online at: <https://www.usps.com/business/add-extra-services.htm>, last accessed on July 14, 2014.

<sup>12</sup> Standard business envelope cost based on current market price, as of July 14, 2014 (i.e., box of 500 standard business envelopes with gummed closure at \$14.89).

<sup>13</sup> U.S. Postal Service, "First-Class Mail." Available online at: <https://www.usps.com/business/prices.htm>, last accessed on July 14, 2014.

<sup>14</sup> Catalog envelope cost based on current market price, as of July 14, 2014 (i.e., box of 100 catalog envelopes with gummed closure at \$13.29).

Schedule (GS) Salary Table 2014.<sup>15</sup> This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

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

O&M costs are associated with Hazardous Waste Report activities. In particular, EPA estimates that the Agency will incur a cost of \$22,019 in printing paper and CD copies of the Hazardous Waste Report forms and instructions, \$275,237 in developing computer capabilities required to compile national data, \$55,047 in preparing the National Report, and \$38,534 in storing the national data. These O&M costs were obtained from the previously approved ICR (i.e., EPA ICR Number 0976.16, dated September 19, 2012), and updated to 2014 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.<sup>16</sup> EPA O&M costs are shown in Exhibit 4 for all applicable activities.

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

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

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

- Hazardous waste facilities complying with the Hazardous Waste Report, notification, and Part A Permit Application requirements covered in this ICR. This includes:
  - Private sector entities; and
  - State and local government agencies that are regulated entities<sup>17</sup>.
- State agencies administering the RCRA hazardous waste program<sup>18</sup>.

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

##### **(a) Hazardous Waste Report**

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<sup>15</sup> U.S. Office of Personnel Management, “2014 General Schedule (Base),” Hourly Rate. Available online at: [http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS_h.pdf), last accessed on July 14, 2014.

<sup>16</sup> Bureau of Labor Statistics, “Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all.” May 2014. Available online at: <http://www.bls.gov/cpi/cpid1405.pdf>, last accessed on July 14, 2014. All items, July 2012=229.104 and May 2014=237.900.

<sup>17</sup> Addressing State and local government agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the Paperwork Reduction Act of 1995.

<sup>18</sup> Ibid.

Based on 2011 Hazardous Waste Report data<sup>19</sup>, EPA estimates that the total number of respondents to the 2015 Hazardous Waste Report will be 20,536, which annualized over the two-year report cycle equals 10,268 per year (i.e., 20,536/2). Table 9 presents information on the total number of forms associated with the 2015 Hazardous Waste Report. In estimating annual respondent burden and cost, EPA annualized these numbers over the two-year report cycle.

**Table 9  
Total Number of 2015 Hazardous Waste Report Forms**

Hazardous Waste Report Form	Number of Forms <sup>a</sup>		
	Private Sector	State and Local Government	Total
Site Identification (Site ID) Form	18,402	2,134	20,536
Form GM - Generation and Management	239,327	17,271	256,598
Form WR - Waste Received from Offsite	1,262,520	7,075	1,269,595
<b>Total</b>	<b>1,520,249</b>	<b>26,480</b>	<b>1,546,729</b>

<sup>a</sup> Based on 2011 Hazardous Waste Report (i.e., 2011 Biennial Report) data current as of July 10-14, 2014. At the time this ICR was developed, 2013 Hazardous Waste Report data were not available

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

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

In estimating the number of respondents subject to the notification requirements covered in this ICR, EPA referred to RCRAInfo. EPA estimated the annual number of notifications tracked by RCRAInfo. EPA then averaged the number of notifications submitted in 2012 and 2013. These estimates are presented in Table 10 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 2 of this ICR.

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

In estimating the number of respondents subject to the Part A Permit Application requirements covered in this ICR, EPA referred to the RCRAInfo system. EPA estimated the annual number of Part A Permit Applications tracked by RCRAInfo. EPA then averaged the number of applications submitted in 2012 and 2013. These estimates are presented in Table 11 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 3 of this ICR.

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<sup>19</sup> 2011 Hazardous Waste Report (i.e., 2011 Biennial Report) data used in this analysis are current as of July 10-14, 2014. At the time this ICR was developed, 2013 Hazardous Waste Report data were not available.

**Table 10**  
**Annual Number of Respondents Subject to the Notification Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2012			Year 2013			Average of Years 2012 and 2013		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>									
Number of facilities submitting notification prior to operating under exclusion	20	0	20	16	0	16	18	0	18
Number of small quantity generators (SQGs) and conditionally-exempt small quantity generators (CESQGs) submitting notification by March 1 of each even numbered year thereafter	14	0	14	4	0	4	9	0	9
Number of facilities submitting notification indicating that they will no longer manage hazardous secondary materials in accordance with the exclusion	21	0	21	9	0	9	15	0	15
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>									
Number of facilities submitting initial notification	10,303	928	11,231	8,010	1,191	9,201	9,157	1,060	10,216
Number of facilities submitting subsequent notification	34,086	2,043	36,129	34,025	1,877	35,902	34,056	1,960	36,016
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>									
Number of eligible academic entities submitting notification of intent to comply with Subpart K and recordkeeping of agreements	2	4	6	5	16	21	4	10	14
Number of teaching hospitals not owned by a college or university opting into Subpart K	0	1	1	0	1	1	0	1	1
Number of non-profit research institutes not owned by a college or university opting into Subpart K	1	0	1	1	0	1	1	0	1
Number of eligible academic entities submitting notification of withdrawal from 40 CFR Part 262, Subpart K	691	14	705	137	0	137	414	7	421

**Table 10 (continued)**  
**Annual Number of Respondents Subject to the Notification Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2012			Year 2013			Average of Years 2012 and 2013		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>									
Number of facilities submitting initial notification	79	13	92	61	13	74	70	13	83
Number of facilities submitting subsequent notification	80	11	91	97	12	109	89	12	100
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>									
Number of facilities submitting initial notification	92	2	94	63	5	68	78	4	81
Number of facilities submitting subsequent notification	227	4	231	157	8	165	192	6	198

<sup>a</sup> Based on data from the following RCRAInfo tables: (1) "Hhandler," (2) "Howner\_operator," (3) "Huniversal\_waste," and (4) "Hhsm\_basic." All tables contain data current as of July 10, 2014.

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

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

**Table 11**  
**Annual Number of Respondents Subject to the Part A Permit Application Requirements Covered in this ICR <sup>a</sup>**

Respondent Universe	Year 2012			Year 2013			Average of Years 2012 and 2013		
	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total	Private Sector <sup>b</sup>	State and Local Government <sup>c</sup>	Total
Number of facilities submitting initial Part A Permit Application	2	0	2	5	0	5	4	0	4
Number of facilities submitting Part A Permit Modification	23	2	25	23	1	24	23	2	25

<sup>a</sup> Based on data from the following RCRAInfo tables: (1) "Hhandler" and (2) "Howner\_operator." Both tables contain data current as of July 10, 2014.

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

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

## **(2) Annual Respondent Burden**

### **(a) Hazardous Waste Report - Facilities (Exhibits 1A and 1B)**

#### *(a1) Read the Hazardous Waste Report Instructions*

EPA estimates that all 20,536 respondents will read the Hazardous Waste Report instructions. Annualized over the two-year report cycle, this results in 10,268 respondents reading the instructions each year (i.e., 9,201 private sector facilities and 1,067 State and local government facilities).

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

EPA estimates that all 9,135 electronic reporters will revise their in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations. Annualized over the two-year report cycle, this results in 4,568 respondents revising their in-house or commercial data systems each year (i.e., 4,349 private sector facilities and 219 State and local government facilities).

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

EPA estimates that all 20,536 respondents will complete and submit a Site ID Form with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 10,268 respondents preparing and submitting a Site ID Form each year (i.e., 9,201 private sector facilities and 1,067 State and local government facilities).

#### *(a4) Gather Information and Complete Form GM*

EPA estimates that respondents will submit a total of 256,598 Forms GM with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 128,300 Forms GM each year (i.e., 119,664 forms from private sector facilities and 8,636 forms from State and local government facilities).

#### *(a5) Gather Information and Complete Form WR*

EPA estimates that respondents will submit a total of 1,269,595 Forms WR with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 634,798 Forms WR each year (i.e., 631,260 forms from private sector facilities and 3,538 forms from State and local government facilities).

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

*(a6) Gather Information and Complete Form OI*

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

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

EPA expects each respondent, 10,268 facilities per year (i.e., 9,201 private sector facilities and 1,067 State and local government facilities), to submit the report to the appropriate State or Region.

*(a8) Maintain a Copy of Each Form*

EPA expects facilities to retain an estimated 773,366 (i.e., 10,268 Site ID Forms + 128,300 Forms GM + 634,798 Forms WR) forms each year (i.e., 760,125 forms from private sector facilities and 13,241 forms from State and local government facilities).

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

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

EPA estimates that State agencies will distribute Hazardous Waste Report forms and instructions to 20,303 respondents. Annualized over the two-year report cycle, this results in 10,152 respondents each year.

*(b2) Assist Respondents*

EPA expects State agencies to provide assistance to all 20,303 respondents. Annualized over the two-year report cycle, this results in 10,152 respondents each year.

*(b3) Key Entry of Report Submissions*

EPA estimates that State agencies will need to key enter data for 22,382 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) completed manually by the facilities. Annualized over the two-year report cycle, this results in 11,191 respondents each year.

*(b4) Perform Quality Assurance*

EPA expects State agencies to perform data quality assurance on all 1,546,729 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) submitted by facilities. Annualized over the two-year report cycle, this results in 771,988 respondents each year.



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

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

EPA estimates that, each year, 18 entities (i.e., 18 private sector facilities and 0 State and local government facility) will notify under 40 CFR 260.42 prior to operating under the exclusion and be required to complete the information laid out at section 260.42(a).

In addition, entities must re-notify using the Site ID Form by March 1 of each even numbered year thereafter. Note that the Hazardous Waste Report regulations already require the submittal of the Site ID Form by March 1 of each even numbered year by LQGs (40 CFR Part 262) and TSDFs (40 CFR Part 264 and 265). Hence, this section of the ICR estimates burden for SQG and CESQG re-notifications only. For purposes of this ICR, EPA estimates that, each year, a total of 9 SQGs and CESQGs will re-notify (i.e., 9 private sector facilities and 0 State and local government facilities).

EPA estimates that, each year, 15 entities will re-notify because they stopped operating under the exclusion (i.e., 15 private sector facilities and 0 State and local government facilities).

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

EPA estimates that, each year, 10,217 facilities (i.e., 9,157 private sector facilities and 1,060 State and local government facilities) will submit an initial notification of hazardous waste activity under RCRA Section 3010. EPA also estimates that, each year, 36,016 facilities (i.e., 34,056 private sector facilities and 1,960 State and local government facilities) will submit a subsequent notification associated with these requirements.

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

Intent to Comply with Subpart K and Recordkeeping of Agreements

An eligible academic entity must submit the Site ID Form to notify EPA or the authorized State that it is electing to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all laboratories that are owned or operated by the eligible academic entity that are on-site. EPA estimates that, each year, 14 forms will be completed, submitted, and retained (i.e., 4 forms from private sector entities and 10 forms from State and local government entities).

Teaching hospitals opting into Subpart K must keep a copy of their formal written affiliation agreement with a college or university on file if they are not owned by a college or university. EPA estimates that, each year, 1 site will retain the agreement on file (i.e., 0 agreements from private sector entities and 1 agreement from State and local government entities).

Non-profit research institutes not owned by a college or university opting into Subpart K must keep a copy of the formal written affiliation agreement with a college or university on file. EPA estimates that, each year, 1 site will retain the agreement on file (i.e., 1 agreement from private sector entities and 0 agreements from State and local government entities).

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

EPA estimates that, each year, 421 eligible academic entities will submit a notification of withdrawal from 40 CFR Part 262, Subpart K. (i.e., 414 notifications from private sector entities and 7 notifications from State and local government entities).

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

EPA estimates that, each year, 83 facilities (i.e., 70 private sector facilities and 13 State and local government facilities) will submit an initial notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $83 \times 0.75 = 62$ ) will use the Site ID Form and 25 percent (i.e.,  $83 \times 0.25 = 21$ ) will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, 101 facilities (i.e., 89 private sector facilities and 12 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $101 \times 0.75 = 76$ ) will use the Site ID Form and 25 percent (i.e.,  $101 \times 0.25 = 25$ ) will prepare and submit a letter requesting an EPA Identification Number.

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

EPA estimates that, each year, 82 facilities (i.e., 78 private sector facilities and 4 State and local government facilities) will submit an initial notification of used oil activity under 40 CFR Part 279. Of these facilities, 75 percent (i.e.,  $82 \times 0.75 = 61$ ) will use the Site ID Form and 25 percent (i.e.,  $82 \times 0.25 = 21$ ) will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, 198 facilities (i.e., 192 private sector facilities and 6 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. Of these facilities, 75 percent (i.e.,  $198 \times 0.75 = 148$ ) will use the Site ID Form and 25 percent (i.e.,  $198 \times 0.25 = 50$ ) will prepare and submit a letter requesting an EPA Identification Number.

#### **(d) Notification of Regulated Waste Activity – State Agencies (Exhibit 2C)**

State agencies will conduct the information collection activities associated with the Notification of Regulated Waste Activity in Authorized States.

*(d1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42*

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 16 facilities that plan to operate under the exclusion at 40 CFR 260.42, 8 facilities that must re-notify by March 1 of each even numbered year, and 13 facilities that will re-notify because they stopped operating under the exclusion.

*(d2) Notification of Hazardous Waste Activity under RCRA Section 3010*

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 10,217 facilities that will submit an initial notification of hazardous waste activity under RCRA Section 3010 and for 36,016 facilities that will submit a subsequent notification associated with these requirements.

*(d3) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K*

Intent to Comply with Subpart K and Recordkeeping of Agreements

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 14 eligible academic entities that elect to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number.

Withdrawal from 40 CFR Part 262, Subpart K

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 421 eligible academic entities that withdraw from the 40 CFR Part 262, Subpart K requirements.

*(d4) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C*

EPA estimates that, each year, State agencies will review and enter initial notification information into RCRAInfo for 83 facilities. Of these facilities, 62 will use the Site ID Form and 21 will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, State agencies will review and enter subsequent notification information into RCRAInfo for 101 facilities. Of these facilities, 76 will use the Site ID Form and 25 will prepare and submit a letter requesting an EPA Identification Number.

*(d5) Notification of Used Oil Activity under 40 CFR Part 279*

EPA estimates that, each year, State agencies will review and enter initial notification information into RCRAInfo for 82 facilities. Of these facilities, 61 will use the Site ID Form and 21 will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, State agencies will review and enter subsequent notification information for 198 facilities. Of these facilities, 148 will use the Site ID Form and 50 will prepare and submit a letter requesting an EPA Identification Number.

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

*(e1) Part A Permit Application*

EPA estimates that, each year, 4 facilities (i.e., 4 private sector facilities and 0 State and local government facility) will submit a new Part A Permit Application. All facilities will need to obtain signatures for the Part A Permit Application, Part A Permit Application reports, and other information requested by the Director. In addition, all facilities will need to obtain certifications from persons signing permit documentation.

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

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

EPA estimates that, each year, 25 facilities (i.e., 23 private sector facilities and 2 State and local government facilities) will need to revise their Part A Permit Application. Of these, EPA expects that approximately one-third (8 facilities) will submit a revised Part A Permit Application in response to an EPA rulemaking, and two-thirds (17 facilities) will submit a revised Part A Permit Application for a facility modification.

EPA further estimates that, each year, one-third of facilities submitting revised Part A Permit Applications (8 facilities) will need to submit justifications due to either changes in the design capacity of processes used at the facility and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. In addition, EPA estimates that, each year, one-third of facilities submitting revised Part A Permit Applications (8 facilities) will need to submit a Subpart H compliance demonstration due to changes in ownership or operational control of a facility.

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

*(f1) Part A Permit Application*

EPA estimates that, each year, State agencies will receive 4 Part A Permit Applications. State agencies will need to review the applications, review the signatories to the permit applications and reports, and enter the Part A Permit Application information into RCRAInfo.

EPA also estimates that, each year, 10 percent of the Part A Permit Applications will

have authorizations that are no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Therefore, each year, State agencies will need to notify<sup>1</sup> applicant of a deficiency in the Part A Application and review the newly authorized signature.

*(f2) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations*

EPA estimates that, each year, State agencies will receive 25 revised Part A Permit Applications. State agencies will need to review the applications and enter the Part A Permit Application information into RCRAInfo.

EPA further estimates that, each year, one-third of the revised Part A Permit Applications (8 applications) will be accompanied by justifications due to either changes in the design capacity of processes used at the facility and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. In addition, EPA estimates that, each year, one-third of the revised Part A Permit Applications (8 applications) will be accompanied by a Subpart H compliance demonstration due to changes in ownership or operational control of a facility. State agencies will need to review all justifications and Subpart H compliance demonstrations.

**1 6(e) BOTTOM LINE HOUR AND COST BURDEN**

**(1) Respondent Tally**

Exhibit 7 summarizes the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual respondent burden to be 619,489 hours and \$25,530,368. The bottom line burden to respondents over two years is estimated to be 1,238,978 hours and \$51,060,736.

**(2) Agency Tally**

Exhibit 8 summarizes the total annual EPA hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual EPA burden to be 1,178 hours and \$247,297. The bottom line burden to EPA over two years is estimated to be 2,356 hours and \$494,594.

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

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

**(1) Hazardous Waste Report**

**(a) Facility Burden**

For facilities, the annual burden estimate for the 2013 Hazardous Waste Report (EPA ICR Number 0976.16) was 170,250 hours. The annual burden estimate for the 2015 Hazardous Waste Report is 195,725 hours. This represents an increase of 25,475 hours.

This increase in burden has occurred for two primary reasons. First, there was an increase in the number of Hazardous Waste Report forms projected for 2013 versus the number of forms projected for 2015. Table 12 compares the projected number of forms for the 2013 and the 2015 Hazardous Waste Reports.

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

**Table 12  
Comparison of Projected Number of Forms  
for the 2013 and 2015 Hazardous Waste Report**

Hazardous Waste Report Form	Projected Number of Forms		Difference <sup>a</sup>
	2013 Hazardous Waste Report	2015 Hazardous Waste Report	
Site ID Form - RCRA Subtitle C Site Identification Form	21,066	20,536	-530
Form GM - Generation and Management	206,032	256,598	50,566
Form WR - Waste Received from Offsite	1,036,999	1,269,595	232,596
<b>Total</b>	<b>1,264,097</b>	<b>1,546,729</b>	<b>282,632</b>

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

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the 2013 Hazardous Waste Report (EPA ICR Number 0976.16) was 228,337 hours. The annual burden estimate for the 2015 Hazardous Waste Report is 301,752 hours. This represents an increase of 73,415 hours.

This increase in burden has occurred for two primary reasons. First, there was an increase in the number of Hazardous Waste Report forms from 2013 to 2015. Refer to Table 12 for a comparison of the projected number of forms for the 2013 and the 2015 Hazardous Waste Reports.

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

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

**(a) Facility Burden**

For facilities, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.16) was 33,826 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.17) is 34,876 hours. This represents an increase of 1,050 hours.

This increase in burden has occurred for two primary reasons. First, there was an increase in the total number of notifications covered in the ICR. As shown in Table 13, the total number of notifications increased from 46,035 in the previously approved ICR (EPA ICR Number 0976.16) to 47,176 in this ICR (EPA ICR Number 0976.17).

Second, in developing this ICR, EPA carefully reviewed the respondent activities associated with the notification requirements. Based on consultations with industry, EPA increased some of the hourly burden estimates associated with notifications. EPA believes that the revised burden estimates included in this ICR reflect a realistic industry average.

**Table 13  
Comparison of Projected Number of Notifications in the  
Previously Approved ICR (EPA ICR Number 0976.16) and  
this ICR (EPA ICR Number 0976.17).**

Type of Notification	Projected Number of Notifications		Difference <sup>a</sup>
	EPA ICR Number 0976.16	EPA ICR Number 0976.17	
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42	30	42	12
Notification of Hazardous Waste Activity under RCRA Section 3010	45,520	46,233	713
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K	9	437	428
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C	154	184	30
Notification of Used Oil Activity under	322	280	-42

40 CFR Part 279			
<b>Total</b>	<b>46,035</b>	<b>47,176</b>	<b>1,141</b>

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

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.16) was 0 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.17) is 86,538 hours. This represents an increase of 86,538 hours.

This increase in burden has occurred because, in the previously approved ICR (EPA ICR Number 0976.16), all implementing agency activities were allocated to EPA. However, Authorized States implement notification requirements. Thus, the burden associated with notification activities at Authorized States was allocated to State agencies. EPA believes that this revision more accurately reflects the burden to State agencies.

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

**(a) Facility Burden**

For facilities, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.16) was 389 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.17) is 447 hours. This represents an increase of 58 hours.

The increase in hourly burden occurred for two primary reasons. First, there was an increase in the number of modifications to Part A Permit Applications. The number of modifications increased from 22 in the previously approved ICR to 25 in this ICR.

Second, in developing this ICR, EPA carefully reviewed the respondent activities associated with the Part A Permit Application requirements. Based on consultations with industry, EPA increased some of the hourly burden estimates associated with Part A Permit Applications. EPA believes that the revised burden estimates included in this ICR reflect a realistic industry average.

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.16) was 101 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.17) is 150 hours. This represents an increase of 49 hours.

The increase in hourly burden occurred for two primary reasons. First, there was an increase in the number of modifications to Part A Permit Applications. The number of modifications increased from 22 in the previously approved ICR to 25 in this ICR.



Second, in developing this ICR, EPA carefully reviewed the respondent activities associated with the Part A Permit Application requirements. Based on consultations with States, EPA increased some of the hourly burden estimates associated with Part A Permit Applications. EPA believes that the revised burden estimates included in this ICR reflect a realistic national average.

## **6(g) PUBLIC BURDEN STATEMENT**

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

The reporting burden is estimated to be about 14 hours for a facility to gather data, complete and review the forms, and submit the Hazardous Waste Report. The recordkeeping burden is estimated to be about 5 hours to read the instructions, and file and store the Hazardous Waste Report submission for three years.

The reporting burden is estimated to be about 30 hours per facility for a State agency to distribute the Hazardous Waste Report Instructions and Forms, assist respondents, key entry report submissions, and perform quality assurance. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

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

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

The reporting burden associated with hazardous secondary material notification requirements is estimated to be about 1 hour for a facility to notify EPA under 40 CFR 260.42. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The recordkeeping burden associated with hazardous secondary material notification requirements (initial and subsequent) is estimated to be 1.7 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

The reporting burden associated with RCRA Section 3010 notification requirements (initial and subsequent) is estimated to be about 44 minutes for a facility to complete and submit the form. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The recordkeeping burden associated with RCRA Section 3010 notification requirements (initial and subsequent) is estimated to be about 1.8 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

The reporting burden associated with notification requirements under 40 CFR Part 262, Subpart K is estimated to be about 38 minutes for a facility to prepare and submit a Site ID Form to opt into or withdraw from Subpart K. The recordkeeping burden is estimated to be about 5 minutes to keep copies of notification and affiliation agreements on-site.

The recordkeeping burden associated with 40 CFR Part 262, Subpart K notification requirements (initial and subsequent) is estimated to be about 1.7 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

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

The recordkeeping burden associated with 40 CFR Part 273, Subpart C notification requirements (initial and subsequent) is estimated to be about 1.9 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

The reporting burden associated with 40 CFR Part 279 notification requirements (initial and subsequent) is estimated to be about 42 minutes for a facility to complete the Site ID Form or prepare a letter requesting an EPA Identification Number, and submit the completed Site ID Form or letter. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The recordkeeping burden associated with 40 CFR Part 279 notification requirements (initial and subsequent) is estimated to be about 1.9 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

**(a) Part A Permit Application**

The reporting burden associated with the Part A Permit Application requirements is estimated to be about 24 hours for a facility to prepare and submit a Part A Permit Application. The recordkeeping burden is estimated to be about 7 hours to read the regulations.

The reporting burden associated with the Part A Permit Application requirements is estimated to be about 12 minutes for a State agency to notify an applicant of a deficiency in the Part A Permit Application. The recordkeeping burden is estimated to be about 5 hours to review an application and signatories to the permit applications and reports, and enter the Part A Permit Application information into RCRAInfo.

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

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

The recordkeeping burden associated with revising a Part A Permit Applications is estimated to be 5 hours for State agencies to review a Part A Permit Application, justification, and Subpart H compliance demonstration, and enter the Part A Permit Application information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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

To comment on 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-2014-0296, 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 Building, 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 RCRA Docket is (202) 566-0270, and the fax number is (202) 566-9744. 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-2014-0296 and OMB Control Number 2050-0024 in any correspondence.

EXHIBIT 1A  
 2015 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$129.82/ Year	Mgr. \$76.73/ Year	Tech. \$57.16/ Year	Cler. \$34.39/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>Hazardous Waste Report</b>											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$178.90	\$0.00	\$0.00	9,201	25,394.76	\$1,646,058.90
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$63.62	\$0.00	\$0.00	4,349	4,349.00	\$276,683.38
Gather information and prepare Site ID Form	0.00	0.08	0.60	0.16	0.84	\$45.94	\$0.00	\$0.00	9,201	7,728.84	\$422,693.94
Gather information and prepare Form GM	0.00	0.13	0.15	0.04	0.32	\$19.92	\$0.00	\$0.00	119,664	38,292.48	\$2,383,706.88
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$7.77	\$0.00	\$0.00	631,260	75,751.20	\$4,904,890.20
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$88.09	\$0.00	\$6.51	9,201	12,329.34	\$870,414.60
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$1.26	\$0.00	\$0.00	760,125	22,803.75	\$957,757.50
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>186,649.37</b>	<b>\$11,462,205.40</b>

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

EXHIBIT 1B  
 2015 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Hazardous Waste Report</b>											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$118.56	\$0.00	\$0.00	1,067	2,944.92	\$126,503.52
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$41.56	\$0.00	\$0.00	219	219.00	\$9,101.64
Gather information and prepare Site ID Form	0.00	0.08	0.60	0.16	0.84	\$28.43	\$0.00	\$0.00	1,067	896.28	\$30,334.81
Gather information and prepare Form GM	0.00	0.13	0.15	0.04	0.32	\$13.36	\$0.00	\$0.00	8,636	2,763.52	\$115,376.96
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$5.43	\$0.00	\$0.00	3,538	424.56	\$19,211.34
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$61.85	\$0.00	\$6.51	1,067	1,429.78	\$72,940.12
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$0.77	\$0.00	\$0.00	13,241	397.23	\$10,195.57
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>9,075.29</b>	<b>\$383,663.96</b>

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

EXHIBIT 1C  
 2015 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Hazardous Waste Report</b>											
Distribute Hazardous Waste Report forms and instructions	0.00	0.02	0.25	0.50	0.77	\$20.49	\$0.00	\$3.21	10,152	7,817.04	\$240,602.40
Assist respondents	0.00	0.02	0.38	0.38	0.78	\$22.31	\$0.00	\$0.00	10,152	7,918.56	\$226,491.12
Key entry of report submissions	0.00	0.02	0.07	0.22	0.31	\$8.29	\$0.00	\$0.00	11,191	3,469.21	\$92,773.39
Perform quality assurance	0.00	0.02	0.17	0.18	0.37	\$10.60	\$0.00	\$0.00	771,988	282,547.61	\$8,183,072.80
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>301,752.42</b>	<b>\$8,742,939.71</b>

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

EXHIBIT 2A

NOTIFICATION OF REGULATED WASTE ACTIVITY

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$129.82/ Year	Mgr. \$76.73/ Year	Tech. \$57.16/ Year	Cler. \$34.39/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.10	0.94	0.10	1.14	\$64.84	\$0.00	\$3.82	18	20.52	\$1,235.88
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.10	0.94	0.10	1.14	\$64.84	\$0.00	\$3.82	9	10.26	\$617.94
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	15	9.60	\$601.20
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	40.38	\$2,455.02
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$62.05	\$0.00	\$3.82	9,157	9,981.13	\$603,171.59
<b>Subsequent Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	34,056	21,795.84	\$1,364,964.48
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	31,776.97	\$1,968,136.07
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	4	2.56	\$160.32
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$2.75	\$0.00	\$0.00	4	0.32	\$11.00
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.75	\$0.00	\$0.00	0	0.00	\$0.00
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$2.75	\$0.00	\$0.00	1	0.08	\$2.75
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	414	264.96	\$16,593.12
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$2.75	\$0.00	\$0.00	414	33.12	\$1,138.50
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	301.04	\$17,905.69

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



EXHIBIT 2A (continued)  
 NOTIFICATION OF REGULATED WASTE ACTIVITY  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$129.82/ Year	Mgr. \$76.73/ Year	Tech. \$57.16/ Year	Cler. \$34.39/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$62.05	\$0.00	\$3.82	53	57.77	\$3,491.11
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$28.32	\$0.00	\$3.82	18	9.00	\$578.52
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	67	42.88	\$2,685.36
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$28.32	\$0.00	\$3.82	22	11.00	\$707.08
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	120.65	\$7,462.07
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$62.05	\$0.00	\$3.82	59	64.31	\$3,886.33
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$28.32	\$0.00	\$3.82	20	10.00	\$642.80
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$36.26	\$0.00	\$3.82	144	92.16	\$5,771.52
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$28.32	\$0.00	\$3.82	48	24.00	\$1,542.72
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	190.47	\$11,843.37
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>32,429.51</b>	<b>\$2,007,802.22</b>

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

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

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.10	0.94	0.10	1.14	\$39.83	\$0.00	\$3.82	0	0.00	\$0.00
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.10	0.94	0.10	1.14	\$39.83	\$0.00	\$3.82	0	0.00	\$0.00
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$37.92	\$0.00	\$3.82	1,060	1,155.40	\$44,244.40
<b>Subsequent Notification</b>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	1,960	1,254.40	\$52,214.40
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,409.80	\$96,458.80
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	10	6.40	\$266.40
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$1.74	\$0.00	\$0.00	10	0.80	\$17.40
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$1.74	\$0.00	\$0.00	1	0.08	\$1.74
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$1.74	\$0.00	\$0.00	0	0.00	\$0.00
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	7	4.48	\$186.48
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$1.74	\$0.00	\$0.00	7	0.56	\$12.18
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	12.32	\$484.20

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

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

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$37.92	\$0.00	\$3.82	9	9.81	\$375.66
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$17.85	\$0.00	\$3.82	3	1.50	\$65.01
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	9	5.76	\$239.76
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$17.85	\$0.00	\$3.82	3	1.50	\$65.01
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	18.57	\$745.44
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$37.92	\$0.00	\$3.82	2	2.18	\$83.48
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$17.85	\$0.00	\$3.82	1	0.50	\$21.67
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$22.82	\$0.00	\$3.82	4	2.56	\$106.56
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$17.85	\$0.00	\$3.82	2	1.00	\$43.34
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	6.24	\$255.05
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>2,446.93</b>	<b>\$97,943.49</b>

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

EXHIBIT 2C

NOTIFICATION OF REGULATED WASTE ACTIVITY

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
<b>Notification prior to operating under exclusion(s)</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	16	3.96	\$134.80
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	16	23.60	\$769.82
<b>Notification by March 1 of each even numbered year thereafter</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	8	1.98	\$67.40
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	8	11.80	\$384.91
<b>Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	13	3.30	\$112.33
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	13	19.67	\$641.52
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	64.31	\$2,110.78
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	10,217	2,554.25	\$86,946.67
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$48.94	\$0.00	\$0.00	10,217	15,325.50	\$500,019.98
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$9.36	\$0.00	\$0.52	10,217	4,291.14	\$100,943.96
<b>Subsequent Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	36,016	9,004.00	\$306,496.16
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	36,016	53,663.84	\$1,750,377.60
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	84,838.73	\$2,744,784.37
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	14	3.50	\$119.14
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	14	20.86	\$680.40
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	421	105.25	\$3,582.71
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	421	627.29	\$20,460.60
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	756.90	\$24,842.85

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

EXHIBIT 2C (continued)  
 NOTIFICATION OF REGULATED WASTE ACTIVITY  
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	62	15.50	\$527.62
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$48.94	\$0.00	\$0.00	62	93.00	\$3,034.28
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$9.36	\$0.00	\$0.52	62	26.04	\$612.56
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	21	5.25	\$178.71
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$48.94	\$0.00	\$0.00	21	31.50	\$1,027.74
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$9.36	\$0.00	\$0.52	21	8.82	\$207.48
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	76	19.00	\$646.76
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	76	113.24	\$3,693.60
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	25	6.25	\$212.75
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	25	37.25	\$1,215.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	355.85	\$11,356.50
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	61	15.25	\$519.11
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$48.94	\$0.00	\$0.00	61	91.50	\$2,985.34
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$9.36	\$0.00	\$0.52	61	25.62	\$602.68
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	21	5.25	\$178.71
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$48.94	\$0.00	\$0.00	21	31.50	\$1,027.74
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$9.36	\$0.00	\$0.52	21	8.82	\$207.48
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	148	37.00	\$1,259.48
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	148	220.52	\$7,192.80
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	50	12.50	\$425.50
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$48.60	\$0.00	\$0.00	50	74.50	\$2,430.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	522.46	\$16,828.84
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>86,538.25</b>	<b>\$2,799,923.34</b>

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

EXHIBIT 3A

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$129.82/ Year	Mgr. \$76.73/ Year	Tech. \$57.16/ Year	Cler. \$34.39/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
<b>Contents of the Part A Permit Application</b>											
Read the regulations and instructions	2.38	1.18	3.57	0.00	7.13	\$603.57	\$0.00	\$0.00	4	28.52	\$2,414.28
Prepare the Site Identification Form	0.00	0.08	0.69	0.17	0.94	\$51.43	\$0.00	\$0.00	4	3.76	\$205.72
Prepare the Hazardous Waste Permit Information Form and reports	1.67	3.28	8.83	1.67	15.45	\$1,030.63	\$0.00	\$0.00	4	61.80	\$4,122.52
<b>Signatories to Permit Applications and Permit Application Reports</b>											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$129.92	\$0.00	\$0.00	4	10.00	\$519.68
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$112.72	\$0.00	\$0.00	1	2.00	\$112.72
<b>Submittal of Part A Permit Application</b>											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$147.11	\$0.00	\$6.51	4	12.00	\$614.48
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.77	3.07	1.53	5.37	\$287.18	\$0.00	\$0.00	1	5.37	\$287.18
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	123.45	\$8,276.58
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$191.05	\$0.00	\$0.00	8	24.00	\$1,528.40
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$191.05	\$0.00	\$0.00	15	45.00	\$2,865.75
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$498.94	\$0.00	\$6.51	8	54.00	\$4,043.60
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$498.94	\$0.00	\$6.51	15	101.25	\$7,581.75
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$355.26	\$0.00	\$6.51	8	40.00	\$2,894.16
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$355.26	\$0.00	\$6.51	8	40.00	\$2,894.16
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	304.25	\$21,807.82
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>427.70</b>	<b>\$30,084.40</b>

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

EXHIBIT 3B

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
<b>Contents of the Part A Permit Application</b>											
Read the regulations and instructions	2.38	1.18	3.57	0.00	7.13	\$332.70	\$0.00	\$0.00	0	0.00	\$0.00
Prepare the Site Identification Form	0.00	0.08	0.69	0.17	0.94	\$31.71	\$0.00	\$0.00	0	0.00	\$0.00
Prepare the Hazardous Waste Permit Information Form and reports	1.67	3.28	8.83	1.67	15.45	\$624.29	\$0.00	\$0.00	0	0.00	\$0.00
<b>Signatories to Permit Applications and Permit Application Reports</b>											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$84.15	\$0.00	\$0.00	0	0.00	\$0.00
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$73.30	\$0.00	\$0.00	0	0.00	\$0.00
<b>Submittal of Part A Permit Application</b>											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$95.00	\$0.00	\$6.51	0	0.00	\$0.00
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.77	3.07	1.53	5.37	\$181.42	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$124.90	\$0.00	\$0.00	0	0.00	\$0.00
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$124.90	\$0.00	\$0.00	2	6.00	\$249.80
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$285.65	\$0.00	\$6.51	0	0.00	\$0.00
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$285.65	\$0.00	\$6.51	2	13.50	\$584.32
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$207.17	\$0.00	\$6.51	0	0.00	\$0.00
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$207.17	\$0.00	\$6.51	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	19.50	\$834.12
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>19.50</b>	<b>\$834.12</b>

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

EXHIBIT 3C

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES <sup>a</sup>

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$60.57/ Year	Mgr. \$56.86/ Year	Tech. \$34.02/ Year	Cler. \$21.70/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>Part A Permit Application</b>											
Review Part A Permit Applications	0.00	0.00	3.00	0.25	3.25	\$107.49	\$0.00	\$0.00	4	13.00	\$429.96
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	4	1.00	\$34.04
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.32	0.00	0.32	\$10.89	\$0.00	\$0.00	1	0.32	\$10.89
Review signature certifications	0.00	0.00	0.25	0.00	0.25	\$8.51	\$0.00	\$0.00	4	1.00	\$34.04
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$21.70	\$0.00	\$0.00	4	4.00	\$86.80
Notify applicant of deficiency in the Part A Permit Application	0.00	0.00	0.63	0.18	0.81	\$25.34	\$0.00	\$0.00	1	0.81	\$25.34
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	20.13	\$621.07
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Review revised Part A Permit Application	0.00	0.00	3.00	0.25	3.25	\$107.49	\$0.00	\$0.00	25	81.25	\$2,687.25
Enter revised Part A Permit Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$21.70	\$0.00	\$0.00	25	25.00	\$542.50
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$70.02	\$0.00	\$0.00	8	12.00	\$560.16
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$70.02	\$0.00	\$0.00	8	12.00	\$560.16
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	130.25	\$4,350.07
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>150.38</b>	<b>\$4,971.14</b>

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



EXHIBIT 4  
 2015 HAZARDOUS WASTE REPORT  
 ESTIMATED ANNUAL EPA HOUR AND COST BURDEN <sup>a</sup>

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$87.42/ Year	Mgr. \$77.14/ Year	Tech. \$55.50/ Year	Cler. \$23.68/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Hazardous Waste Report</b>											
Develop Hazardous Waste Report forms and instructions	0.00	8.00	80.00	20.00	108.00	\$5,530.72	\$0.00	\$22,019.00	0.50	54.00	\$13,774.86
Distribute Hazardous Waste Report forms and instructions	0.00	0.02	0.25	0.50	0.77	\$27.26	\$0.00	\$0.00	143	110.11	\$3,898.18
Develop computer capabilities required to compile national data	0.00	8.00	80.00	0.00	88.00	\$5,057.12	\$0.00	\$275,237.00	0.50	44.00	\$140,147.06
Assist respondents	0.00	0.02	0.38	0.38	0.78	\$31.63	\$0.00	\$0.00	143	111.54	\$4,523.09
Key entry of report submissions	0.00	0.02	0.07	0.22	0.31	\$10.64	\$0.00	\$0.00	100	31.00	\$1,064.00
Perform quality assurance	0.00	0.02	0.17	0.18	0.37	\$14.93	\$0.00	\$0.00	1,377	503.98	\$20,558.61
Prepare the National Report	0.00	8.00	200.00	40.00	248.00	\$12,664.32	\$0.00	\$55,047.00	0.50	124.00	\$33,855.66
Store the data	0.00	0.00	80.00	0.00	80.00	\$4,440.00	\$0.00	\$38,534.00	0.50	40.00	\$21,487.00
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>1,018.63</b>	<b>\$239,308.46</b>

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

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

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$87.42/ Year	Mgr. \$77.14/ Year	Tech. \$55.50/ Year	Cler. \$23.68/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Hazardous Secondary Material Activity under 40 CFR 260.42</b>											
<b>Notification prior to operating under exclusion(s)</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	2	0.54	\$29.98
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	2	3.22	\$166.95
<b>Notification by March 1 of each even numbered year thereafter</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	1	0.27	\$14.99
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	1	1.61	\$83.47
<b>Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	2	0.45	\$24.98
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	2	2.68	\$139.12
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	8.77	\$459.49
<b>Notification of Hazardous Waste Activity under RCRA Section 3010</b>											
<b>Initial Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$77.84	\$0.00	\$0.00	0	0.00	\$0.00
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$10.58	\$0.00	\$0.52	0	0.00	\$0.00
<b>Subsequent Notification</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K</b>											
<b>Intent to Comply with Subpart K and Recordkeeping of Agreements</b>											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
<b>Withdrawal from 40 CFR Part 262, Subpart K</b>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

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

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

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$87.42/ Year	Mgr. \$77.14/ Year	Tech. \$55.50/ Year	Cler. \$23.68/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$77.84	\$0.00	\$0.00	0	0.00	\$0.00
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$10.58	\$0.00	\$0.52	0	0.00	\$0.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$77.84	\$0.00	\$0.00	0	0.00	\$0.00
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$10.58	\$0.00	\$0.52	0	0.00	\$0.00
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>Notification of Used Oil Activity under 40 CFR Part 279</b>											
<b>Initial Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$77.84	\$0.00	\$0.00	0	0.00	\$0.00
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$10.58	\$0.00	\$0.52	0	0.00	\$0.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$77.84	\$0.00	\$0.00	0	0.00	\$0.00
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$10.58	\$0.00	\$0.52	0	0.00	\$0.00
<b>Subsequent Notification</b>											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	0	0.00	\$0.00
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$77.29	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>8.77</b>	<b>\$459.49</b>

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

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

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$87.42/ Year	Mgr. \$77.14/ Year	Tech. \$55.50/ Year	Cler. \$23.68/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>											
<b>Part A Permit Application</b>											
Review Part A Permit Applications	0.00	0.00	3.00	0.25	3.25	\$172.42	\$0.00	\$0.00	4	13.00	\$689.68
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	4	1.00	\$55.52
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.32	0.00	0.32	\$17.76	\$0.00	\$0.00	1	0.32	\$17.76
Review signature certifications	0.00	0.00	0.25	0.00	0.25	\$13.88	\$0.00	\$0.00	4	1.00	\$55.52
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$23.68	\$0.00	\$0.00	4	4.00	\$94.72
Notify applicant of deficiency in the Part A Application	0.00	0.00	0.63	0.18	0.81	\$39.23	\$0.00	\$0.00	1	0.81	\$39.23
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	20.13	\$952.43
<b>Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations</b>											
Review revised Part A Permit Application	0.00	0.00	3.00	0.25	3.25	\$172.42	\$0.00	\$0.00	25	81.25	\$4,310.50
Enter revised Part A Permit Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$23.68	\$0.00	\$0.00	25	25.00	\$592.00
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$104.62	\$0.00	\$0.00	8	12.00	\$836.96
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$104.62	\$0.00	\$0.00	8	12.00	\$836.96
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	130.25	\$6,576.42
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>150.38</b>	<b>\$7,528.85</b>

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

EXHIBIT 7

2015 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION  
 TOTAL ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN SUMMARY <sup>a</sup>

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
<b>Private Facilities</b>					
Hazardous Waste Report (Exhibit 1A)	186,649.37	\$11,402,306.89	\$0.00	\$59,898.51	\$11,462,205.40
Notification of Regulated Waste Activity (Exhibit 2A)	32,429.51	\$1,839,324.94	\$0.00	\$168,477.28	\$2,007,802.22
Part A Hazardous Waste Permit Application and Modification (Exhibit 3A)	427.70	\$29,804.47	\$0.00	\$279.93	\$30,084.40
<i>Subtotal</i>	<i>219,506.58</i>	<i>\$13,271,436.30</i>	<i>\$0.00</i>	<i>\$228,655.72</i>	<i>\$13,500,092.02</i>
<b>State and Local Government Facilities</b>					
Hazardous Waste Report (Exhibit 1B)	9,075.29	\$376,717.79	\$0.00	\$6,946.17	\$383,663.96
Notification of Regulated Waste Activity (Exhibit 2B)	2,446.93	\$86,216.09	\$0.00	\$11,727.40	\$97,943.49
Part A Hazardous Waste Permit Application and Modification (Exhibit 3B)	19.50	\$821.10	\$0.00	\$13.02	\$834.12
<i>Subtotal</i>	<i>11,541.72</i>	<i>\$463,754.98</i>	<i>\$0.00</i>	<i>\$18,686.59</i>	<i>\$482,441.57</i>
<b>State Agencies</b>					
Hazardous Waste Report (Exhibit 1C)	301,752.42	\$8,710,351.79	\$0.00	\$32,587.92	\$8,742,939.71
Notification of Regulated Waste Activity (Exhibit 2C)	86,538.25	\$2,794,524.70	\$0.00	\$5,398.64	\$2,799,923.34
Part A Hazardous Waste Permit Application and Modification (Exhibit 3C)	150.38	\$4,971.14	\$0.00	\$0.00	\$4,971.14
<i>Subtotal</i>	<i>388,441.05</i>	<i>\$11,509,847.63</i>	<i>\$0.00</i>	<i>\$37,986.56</i>	<i>\$11,547,834.19</i>
<b>All Respondents</b>					
Hazardous Waste Report	497,477.08	\$20,489,376.47	\$0.00	\$99,432.60	\$20,588,809.07
Notification of Regulated Waste Activity	121,414.69	\$4,720,065.73	\$0.00	\$185,603.32	\$4,905,669.05
Part A Hazardous Waste Permit Application and Modification	597.58	\$35,596.71	\$0.00	\$292.95	\$35,889.66
<b>Total</b>	<b>619,489</b>	<b>\$25,245,039</b>	<b>\$0</b>	<b>\$285,329</b>	<b>\$25,530,368</b>
<b>2-Year Total</b>	<b>1,238,978</b>	<b>\$50,490,078</b>	<b>\$0</b>	<b>\$570,658</b>	<b>\$51,060,736</b>

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

**EXHIBIT 8**

**2015 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION  
TOTAL ESTIMATED ANNUAL EPA HOUR AND COST BURDEN SUMMARY <sup>a</sup>**

<b>Information Collection Requirement</b>	<b>Total Hours per Year</b>	<b>Total Labor Cost per Year</b>	<b>Annual Capital/Startup Costs</b>	<b>Annual O &amp; M Costs</b>	<b>Total Cost per Year</b>
Hazardous Waste Report (Exhibit 4)	1,018.63	\$43,889.96	\$0.00	\$195,418.50	\$239,308.46
Notification of Regulated Waste Activity (Exhibit 5)	9	\$459.49	\$0.00	\$0.00	\$459.49
Part A Hazardous Waste Permit Application and Modification (Exhibit 6)	150.38	\$7,528.85	\$0.00	\$0.00	\$7,528.85
<b>Total</b>	<b>1,178</b>	<b>\$51,878</b>	<b>\$0</b>	<b>\$195,419</b>	<b>\$247,297</b>
<b>2-Year Total</b>	<b>2,356</b>	<b>\$103,757</b>	<b>\$0</b>	<b>\$390,837</b>	<b>\$494,594</b>

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