

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2519.01
“HAZARDOUS WASTE EXPORT-IMPORT REVISIONS RULE”**

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Office of Resource Conservation and Recovery
United States Environmental Protection Agency
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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This information collection request (ICR) is entitled "Hazardous Waste Export-Import Revisions (Proposed Rule)" EPA ICR Number 2519.01, OMB Number 2050-NEW.

1(b) Short Characterization

Since March 1992, OECD member countries have regulated the international movement of hazardous wastes destined for recovery under Council Decision C(92)39/FINAL. EPA's April 1996 Imports and Exports of Hazardous Waste Final Rule implements OECD's Council Decision C(92)39/FINAL in the United States under RCRA authority, under 40 CFR Part 262, Subpart H.¹ While that rule codifies the OECD requirements for U.S. imports and exports of hazardous waste with OECD countries, shipments to Canada and Mexico are also covered under separate bilateral agreements. RCRA regulatory requirements for exports to Canada, Mexico, and non-OECD countries are under 40 CFR Part 262, Subpart E, and the corresponding import requirements for shipments from these countries are under 40 CFR Part 262, Subpart F. In 2004, in order to improve some of its provisions and enhance harmonization with the Basel Convention, OECD updated its rule under Council Decision C(2001)107/FINAL, as amended by C(2004)20 and further amendments in November 2005 and November 2008. In 2008, EPA developed the Proposed Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation to implement these updates and strengthen controls on SLABs by making their export subject to subpart E export regulations, if being shipped to Canada, Mexico, or non-OECD countries, or subject to subpart H OECD regulations, if being shipped to OECD countries other than Canada or Mexico. The final rule for these changes was issued in 2010. Because domestic shipment of SLABs for recycling is exempted from RCRA manifest requirements, export shipments of SLABs were also exempted from RCRA manifest requirements. But export shipments of SLABs subject to subpart H OECD requirements were subject to OECD movement document requirements under the changes in the 2010 rule.

Since the 2010 rulemaking, however, EPA and several non-governmental organizations have raised concerns over the lack of reporting and insufficient environmental and occupational health controls associated with transboundary movement of hazardous wastes, most notably regarding exports of SLABs to Canada and Mexico.^{2,3,4} To address these concerns, EPA is

1 U.S. EPA Imports and Exports of Hazardous Waste: Implementation of OECD Council Decision C(92)39 Concerning the Control of Transfrontier Movements of Wastes Destined for Recovery Operations, Final Rule, Federal Register, Vol. 61, No. 72, April 12, 1996.

2 OECD (2012), *Illegal Trade in Environmentally Sensitive Goods*, OECD Trade Policy Studies, OECD Publishing, accessed at <http://dx.doi.org/10.1787/9789264174238-en> on November 12, 2014.

3 Occupational Knowledge International and Fronteras Comunes, *Exporting Hazards: U.S. shipments of used lead batteries to Mexico take advantage of lax environmental and worker health regulations*, June 2011, accessed at http://www.okinternational.org/docs/Exporting%20Hazards_Study_100611v5.pdf on November 12, 2014.

4 Secretariat of the Commission for Environmental Cooperation, *Hazardous Trade? An Examination of US-generated Spent Lead-Acid Battery Exports and Secondary Lead Recycling in Canada, Mexico, and the United States*, April 2013, accessed at <http://www3.cec.org/islandora/en/item/11220-hazardous-trade-examination-us-generated-spent-lead-acid-battery-exports-and> on

proposing to make all U.S. imports and exports of hazardous waste, including those with countries outside of OECD, subject to standards equivalent to those promulgated in 40 CFR Part 262, Subpart H in the 2010 rulemaking. In addition, EPA is proposing to mandate the electronic submission of required documents, which is expected to improve data availability and quality. Better data will help the United States and other countries control the environmental and health risks associated with hazardous waste movement, processing, and disposal.

The pertinent details of the proposed rule are outlined below. For further information regarding the historical context and details of this rulemaking, please refer to the Preamble to the proposed rule.

REGULATORY CHANGES/AMENDMENTS

A. Changes to 40 CFR Part 262, Subparts E and F

The proposed rule will regulate hazardous waste shipments with Mexico, Canada and non-OECD countries in a manner more consistent with regulations currently in place for shipments with other OECD member countries under 40 CFR Part 262, Subpart H. Many of the regulatory changes described below therefore do not alter the requirements in Subpart H associated with each provision, but rather adjust the types of entities held to each requirement by making entities currently subject to Subpart E and F requirements subject to Subpart H requirements. Changes to requirements for shipments currently subject to 40 CFR Part 262, Subpart E (i.e., exports to Canada, Mexico, and non-OECD countries) and Subpart F (i.e., imports from Canada, Mexico, and non-OECD countries) include the following:

(1) Exporters of hazardous waste to Canada, Mexico, and non-OECD countries will be required to submit additional information with each export notice.

This additional information includes an e-mail address and fax number for each listed party on the notice, all anticipated transporters for the shipments, all anticipated export ports in the United States, any interim facilities to be used during the transfer of waste, and the OECD waste codes and recycling or disposal operation codes for all waste streams to be shipped. Exporters to other OECD countries are already required to submit this information, and will therefore experience no change in their cost burden as a result of the proposed rule.

(2) Importers of RCRA hazardous wastes not treated as hazardous waste exports by the country of export will need to submit notices to EPA on behalf of foreign exporters.

§262.82(a)(2)(ii) requires that hazardous waste shipments fulfill all regulatory requirements regardless of the designation of the waste in the country of export. §262.82(a)(2)(ii)(B) specifies that export notice requirements usually assigned to foreign exporters will become the duty of U.S. import facilities receiving shipments of waste. This requirement already applies to shipments of waste from other OECD countries and will be required for import shipments from Canada, Mexico, or non-

OECD countries. This new U.S. requirement will not affect shipments from Canada as Canadian regulations already require export notices whenever the country of import controls the proposed shipment as hazardous waste, but will affect import shipments from Mexico and non-OECD countries.

- (3) For export annual reports to EPA, exporters to Canada, Mexico, and non-OECD countries must list OECD waste codes for all shipments in addition to RCRA waste codes, and must list DOT/ID numbers in place of DOT hazard classes.**

Exporters of hazardous waste to OECD countries must already comply with the first requirement in Subpart H. Exporters to Canada, Mexico, and non-OECD countries will be affected by the second requirement, but as it replaces an existing data item being collected, the net impact of the second requirement will be zero.

- (4) Contracts must be signed between exporters and importers of hazardous waste and foreign facilities specifying the parties relevant to each shipment and the various legal responsibilities of each party involved.**

Exporters and importers of hazardous waste with OECD countries are already held to this requirement under subpart H. Exporters and importers of hazardous waste with Canada, Mexico and non-OECD countries will now be subject to this new U.S. requirement, but U.S. exporters and importers of waste with Canada will not be impacted as Canadian regulations already require contracts between the Canadian facility and the foreign facility.

- (5) Exception reports can be based on either RCRA manifests or OECD movement documents.**

Currently, exception reports under Subpart E are only based off of RCRA manifests. This change will potentially impact export shipments of universal waste and SLABs to Canada, Mexico, and non-OECD countries that are partially or wholly rejected by the foreign receiving facility.

- (6) Exporters and importers must ensure that a movement document accompanies all shipments of hazardous waste.**

The movement document must include a signed certification, as well as all information required for notification. For shipments to and from Canada, exporters and importers may use the existing Canadian movement document they are already required to use under Canadian regulations to fulfill this requirement. Similarly, exporters to OECD countries and importers receiving waste from OECD countries for recycling (with the exception of Canada and Mexico) are already required to complete this document. Therefore, this requirement will only impact exporters and importers exchanging waste with Mexico and non-OECD countries.

- (7) U.S. receiving facilities must send a copy of the signed OECD movement**

document to EPA, the foreign exporter of the waste, and the relevant authorities of the exporting country.

This requirement must be completed within three days of receiving a shipment of hazardous waste. Importers must also maintain a signed copy of the movement document for three years. Importers receiving waste from other OECD countries must already comply with this requirement. Similarly, importers receiving waste from Canada can use the Canadian movement document they are already required to send to the Canadian exporter under Canadian regulations to fulfill this requirement, so the expected net burden will be sending copies to EPA and to Environment Canada. Importers receiving shipments from Mexico and non-OECD countries will experience the full impact of this change, as they currently do not send copies of such a movement document to anyone.

(8) U.S. receiving facilities must prepare and send a confirmation of recovery or disposal to EPA, the exporter, and the relevant authority in the country of export for each shipment received.

Importers receiving shipments from OECD countries are already subject to this requirement under existing U.S. regulations, and will therefore not experience a change in burden as a result of the proposed rule. U.S. importers receiving shipments from Canada are already required to prepare and send a confirmation to the foreign exporter, and therefore will only incur costs to send confirmations to EPA and Environment Canada. U.S. importers receiving shipments from Mexico and non-OECD countries will experience the full impact of this change as they are not currently required to send confirmations of recovery or disposal to anyone.

(9) U.S. exporters must maintain a copy of the movement document and the confirmation of recovery or disposal from the foreign importing facility for three years.

Exporters to OECD countries are already subject to this requirement under existing regulations, and will therefore not experience a change in burden as a result of the proposed rule. Exporters to Canada, Mexico, and non-OECD countries will be affected by this change.

(10) Return of wastes.

When a manifested shipment of hazardous waste cannot be completed, the primary exporter must (1) instruct the transporter to either return the shipment to the exporter or to an alternative facility in the United States, and (2) submit an exception report to EPA. The proposed rule does not change any of these requirements with the exception of allowing the alternate facility to be in the country of import if allowed by the country of import, specifying that the instructions to the transporter be made via mail, e-mail, or fax (so that a record of the instructions exist), and requiring that the shipments be returned within 90 days of receiving notification from the country of

import or transit.

(11) Transnational shipments with Canada, Mexico, and non-OCED countries that are exempt from export and import requirements as wastes destined for laboratory analysis are subject to additional weight limits.

Under existing regulations in 40 CFR Part 261, domestic shipments of hazardous waste sent for laboratory analysis are exempt from hazardous waste requirements if they fall within certain weight limits. Existing weight limits for exempted waste shipments range from 1kg for acute hazardous waste to 10,000kg of media contaminated with non-acute hazardous waste. Exporters and importers shipping hazardous waste samples for laboratory analysis to and from OECD countries are already subject to the additional limitation that the samples weigh no more than 25kg to be exempt from Subpart H export and import requirements (e.g., notice, movement document). The proposed rule makes exporters and importers shipping samples for laboratory analysis to and from Canada, Mexico, and non-OECD countries subject to the additional limitation of samples weighing no more than 25kg to be exempt from export and import requirements. As a result, currently-exempt shipments may no longer be exempt. EPA is requesting comment on the number of currently exempt shipments that will be impacted by this change.

(12) Transporter manifesting requirements.

Exporters shipping wastes to any country subject to RCRA manifesting requirements will no longer be required to provide an extra copy of the manifest to the transporter, and the transporter will no longer be required to give that copy to the Customs officer at the port of exit at time of departure. This change will affect all export shipments currently subject to Subpart E or H. This paper submittal requirement is being dropped because it will be duplicative to CBP's Automated Export System (AES) filing and information provided in the eventual submittal of the OECD movement document by the foreign receiving facility to confirm receipt.

B. Changes to 40 CFR Part 262, Subpart H

(1) Exporters will no longer be required to submit a copy of EPA's Acknowledgment of Consent to transporters.

Under existing regulations in Subpart E, exporters shipping to Canada, Mexico, and non-OECD countries must provide a copy of EPA's Acknowledgment of Consent to the transporter for each hazardous waste shipment. The proposed rule eliminates this requirement. Exports to OECD countries other than Canada and Mexico will not be impacted by this change.

(2) Obtain EPA Identification Numbers

The proposed rule will require all recognized traders involved in the arrangement of transportation of hazardous waste to obtain an EPA ID number.⁵ EPA assumes that one percent of all exporters and importers are recognized traders, and request comment on the accuracy of this assumption.

(3) Exporters and importers must comply with electronic reporting requirements using EPA's hazardous waste import/export database.

The proposed rule establishes requirements for electronic reporting for exporters and importers of hazardous waste and exempted waste in part 261 subject to export conditions (i.e., cathode ray tubes (CRTs) being exported for recycling). Many of the activities required for these entities will be determined by instructions associated with EPA's electronic document receiving system. Under the proposed rule, EPA plans to employ the already developed agency-wide receiving system, the Central Data Exchange (CDX), for the electronic submittal of required forms. The electronic system guides users through the registration and reporting procedures. Electronic submittal is required for all exporters and importers; however, a waiver is available for companies that meet certain conditions specified by EPA (i.e., lack of access to broadband internet or other unique circumstances). Each individual entity required to submit documents electronically will need to register to use the system. The proposed rule will require electronic submittal of export notices, import notices (where the shipment is not considered hazardous in the country of export), confirmation of receipt for import manifests, confirmation of recovery/disposal, movement documents, exception reports, annual reports, and notification for return of wastes. Each submittal will require that the exporter or importer sign each document electronically.

(4) Exporters must file additional EPA data elements as part of their AES filing requirements under 15 CFR 30.4 (this requirement is also being added to the CRT export requirements in 40 CFR 261.39(a)(5)).

Under existing U.S. Census Bureau regulations, exporters of waste subject to RCRA consent requirements must enter shipment data into the U.S. Census Bureau's AES for each shipment. Under the proposed rule, exporters will be required in Subpart H to fill in two additional fields for the export license and EPA consent number, and conditionally required to fill in three additional fields related to the RCRA hazardous waste manifest tracking number, exported quantity, and reporting units if the existing AES-required reporting is not in units of weight (kg) or volume (L). It is unknown what percentage of the filings are expected to require the conditional data fields, so EPA is requesting comment from exporters on what export shipments of waste are not required to report in units of weight or volume in AES.

⁵ A recognized trader is a person domiciled in the United States, who acts to arrange and facilitate transboundary movements of wastes destined for recovery or disposal operations, either by purchasing from and subsequently selling to U.S. and foreign facilities, or by acting under arrangements with a U.S. waste facility to arrange for the export or import of the wastes.

This provision would also set new requirements for CRTs exported for recycling under 40 CFR 261.39. EPA estimates that these exporters are already filing in AES for all shipments under current U.S. Census Bureau regulations. This change would require the filing of two to five additional fields in AES, as would filings for hazardous waste export shipments subject to Part 262 export requirements.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The requirements covered in this ICR are necessary for EPA to oversee the international trade of hazardous wastes. EPA is promulgating the above regulatory changes/amendments under the authority of Sections 1006, 1007, 2002(a), 3001-3010, 3013-3015, and 3017 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), and as amended by the Hazardous and Solid Waste Amendments, 42 U.S.C. 6905, 6906, 6912, 6921-6930, 6934, and 6938.

2(b) Practical Utility and Users of the Data

The Office of Enforcement and Compliance Assurance, U.S. EPA, uses the information provided by each U.S. exporter, receiving facility, transporter, and recognized trader to determine compliance with the applicable RCRA regulatory provisions. In addition, the information is used to determine the number, origin, destination, and type of exports from and imports to the U.S. for tracking purposes and for reporting to the OECD. This information also is used to assess the efficiency of the program.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

Most of the information required by the regulations covered by this ICR is not available from any source but the respondents. In certain occasions, such as the notification of intent to export hazardous waste, EPA allows the primary exporter to submit one notice that covers activities over a period of twelve months.

Except as described below, the proposed rule does not result in the collection of duplicate data. Although some of the information required for the hazardous waste manifest and the movement document is substantively the same, up to six pieces of additional information are required for the movement document. In addition, these two documents serve different purposes. A signed copy of the hazardous waste manifest, which is not valid beyond U.S. borders, is dropped off at the U.S. Customs check point when the shipment leaves the U.S. to verify pertinent information, including point of departure, date, destination, and contents of the shipment. The movement document must accompany the shipment until it reaches the foreign

recovery facility. The signed movement document is subsequently returned to EPA and the U.S. exporter to acknowledge receipt of the shipment.

In certain cases, some of the information on the tracking document also may be collected by the Department of Commerce in its Census Bureau form titled "Shipper's Export Declaration" (15 CFR Part 30). This form, which is required for all shipments that have a value in excess of \$2,500, must be filed at the U.S. port of exit, similar to the current export requirements. However, the information contained in the Census Bureau's form is not adequate for EPA's purpose of tracking and identifying the export of hazardous waste from the U.S. For example, the wastes are identified by tariff codes that are less precise than the waste codes required by the tracking document.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA will open a 60-day public comment period at the time that this Proposed Rule is published in the Federal Register. To assist the public in commenting on the proposal, EPA has raised a number of issues in the preamble to the Proposed Rule and asked for the public to comment on them. At the end of the comment period, EPA will review public comments received in response to the notice and will address comments received, as appropriate.

3(c) Consultations

EPA consulted with U.S. Customs and Border Protection and U.S. Census Bureau on the AES filing requirements. EPA did not consult with any other organizations in the development of this ICR.

3(d) Effects of Less Frequent Collection

EPA has carefully considered the burden imposed upon the regulated community by the hazardous waste export-import revisions. EPA is confident that the activities required of respondents are necessary, and to the extent possible, has attempted to minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the regulations are not met, EPA cannot ensure that hazardous wastes are 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, OMB's Information Collection Review Handbook, and other applicable OMB guidance.

3(f) Confidentiality

Section 3007(b) of RCRA and 40 CFR Part 2, subpart B, which defines EPA's general policy on public disclosure of information, contain provisions for confidentiality. However, the Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the proposed rule. If such a claim were asserted, EPA must and will treat the information

in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

3(g) Sensitive Questions

No questions of a sensitive nature are included in the information collection requirements associated with the proposed rule.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

The revisions to the hazardous waste export and import requirements under the proposed rule affect all recycling and disposal facilities who receive imports of hazardous waste and all persons who export or import (or arrange for the export or import) of hazardous waste being shipped for either recycling or disposal, SLABs being shipped for reclamation, industrial ethyl alcohol being shipped for reclamation, and hazardous recyclable materials being shipped for precious metal recovery, and hazardous waste samples of more than 25 kilograms being shipped for waste characterization or treatability studies. Potentially affected industries may include, but are not limited to the following:

NAICS	Industry Sector
211	Oil and Gas Extraction
212	Mining (except Oil and Gas)
213	Support Activities for Mining
311	Food Manufacturing
324	Petroleum and Coal Products Manufacturing
325	Chemical Manufacturing
326	Plastics and Rubber Products Manufacturing
327	Nonmetallic Mineral Product Manufacturing
331	Primary Metal Manufacturing
332	Fabricated Metal Product Manufacturing
333	Machinery Manufacturing
334	Computer and Electronic Product Manufacturing
335	Electrical Equipment, Appliance, and Component Manufacturing
336	Transportation Equipment Manufacturing
339	Miscellaneous Manufacturing
423	Merchant Wholesalers, Durable Goods
424	Merchant Wholesalers, Nondurable Goods
441	Motor Vehicle and Parts Dealers
482	Rail transportation
483	Water transportation
484	Truck transportation

NAICS	Industry Sector
488	Support Activities for Transportation
531	Real Estate
541	Professional, Scientific, and Technical Services
561	Administrative and Support Services
562	Waste Management and Remediation Services
721	Accommodation
924	Administration of Environmental Quality Programs

This list of potentially affected entities may not be exhaustive. The Agency's aim is to provide a guide for readers regarding those entities that potentially could be affected by this action. However, this action may affect other entities not listed in these tables.

4(b) Information Requested

This section describes the information collection requirements applicable to entities that would be affected by the Proposed Hazardous Waste Export-Import Revisions Rule.

CDX Registration

(i) Data Items:

The proposed rule establishes requirements for electronic reporting for exporters and importers of hazardous waste. Many of the activities required for these entities will be determined by instructions associated with EPA's electronic document receiving system. Under the proposed rule, EPA plans to develop enhancements to the Waste Import Export Tracking System (WIETS) to receive these submittals, likely using the Agency-wide CDX system, which will facilitate the electronic submittal of required documents. WIETS guides users through the registration and reporting procedures. Electronic submittal is required for all exporters and importers, with the exception of companies that meet certain conditions specified by EPA. Each entity required to submit documents electronically will need to register to use the system. To the extent that CROMERR applies, each submittal will require that the exporter or importer provide an electronic signature.

Under the proposed rule, EPA estimates that any staff involved in the reporting of export/import notices, annual reports, or other required documents would have to register using the electronic receiving system. If identity proofing fails, registrants are routed to an "electronic signature agreement" form that is completed on the computer, printed out, signed, and then mailed to EPA. In addition, EPA estimates that 10 percent of users will have to update their information each year. EPA also estimates that 10 percent of users will have to register as new users due to employee turnover and 1 percent of users will have to re-register due to compromised signatures each year.

(ii) Respondent Activities:

All users will need to register using EPA's electronic receiving system and update their information when necessary. EPA estimates that importers will have an average of 4.7 users and exporters will have an average of 5 users.⁶ If identity proofing fails, the user will need to print and complete a document, sign it, and mail it to EPA.

Notification

(i) Data Items:

Under the proposed §262.83(b), exporters sending hazardous waste to Canada, Mexico, and non-OECD countries will be required to submit additional information with each notice. This additional information includes an e-mail address and fax number for each listed party on the notice, all anticipated ports of exit, all anticipated transporters for the shipments, any interim facilities to be used during the transfer of waste, and the OECD waste codes and recycling or disposal operation codes for all waste streams to be shipped.

Exporters to Canada will not experience an additional burden from listing transporters and interim facilities, as these data elements are already required by Canadian regulations. Exporters to other OECD countries are already required to submit this information, and will therefore experience no change in their cost burden as a result of the proposed rule.

Once the electronic system becomes fully operational, exporters will have the option to use the duplication feature in WIETS (in which data field information is copied from the previous notice), which will reduce this estimated burden for entities that submit identical notices (with the exception of the first and last shipment date fields) from year to year. EPA estimates that 60 percent of exporters will be able to take advantage of this duplication feature and incur no additional burden for providing supplemental information in WIETS starting in the second year after electronic submittal is formally mandated. The remaining 40 percent of exporters will have to enter this information for each new export notice.

The proposed rule would require receiving facilities in the U.S. importing waste from *maquiladoras* in Mexico to submit import notices on behalf of these foreign exporters for any waste shipments not controlled as hazardous waste exports by Mexican authorities.

The proposed rule also requires electronic submittal of notices using WIETS. To the extent that CROMERR applies, this would require exporters and importers to provide an electronic signature with each notice.

The proposed rule will eliminate the existing §264.12(a)(1) requirement that importers notify a regional administrator four weeks prior to receiving a shipment of hazardous waste for the first time. This will result in a cost savings for U.S. importers.

⁶ EPA estimates that large firms will have 6 employees and small firms will have 3 employees register to use the EPA's electronic receiving system. The estimates of 4.7 and 5 users per entity are based on the distribution of large and small firms among potentially affected importers and exporters based on data collected from Dun & Bradstreet (D&B).

(ii) Respondent Activities:

Exporters must prepare and submit an export notice at least 60 days before the initial shipment is intended to be shipped off site. This notice may cover export activities extending over a 12 month period. If CROMMER applies, they must also electronically sign the notice.

Importers must prepare and submit a notice on behalf on the foreign exporter for shipments from *maquiladoras* in Mexico that are not controlled as hazardous waste exports by the foreign authority. The notice must contain detailed information regarding the exporter, waste details, transporters, means of transport and containers to be used, all points of entry and departure for each foreign country of transit, receiving facility information, and ultimate management method, and may cover shipments over a 12-month period. If CROMERR applies, importers must also electronically sign the notice.

One-time notices identifying the name, address, and contact information for a U.S. receiving facility and every new waste stream they intend to import are no longer required.

Re-notification

(i) Data Items:

Under the proposed §262.83(b), as under the existing §262.53(c), when the conditions specified under the original notification change, the U.S. exporter must provide EPA with a re-notification of the change. The proposed rule requires electronic submittal of all re-notifications sent to EPA. This will require each exporter to provide an electronic signature for certain data elements on each notice submitted.

Also, under the proposed §262.83(e) and (f) where a single shipment cannot be delivered or is rejected for any reason, the transporter or receiving facility must notify the exporter, EPA and the country of import or transit of the situation. Then, alternate management must be found in the country of import that is acceptable to the country of import, or the shipment must be returned to the United States; and finally, the exporter must submit an exception report.

(ii) Respondent Activities:

U.S. exporters must prepare and submit a re-notification to EPA if they wish to change the terms of the original notice. U.S. exports must submit an exception report if the shipment cannot be delivered. To the extent that CROMERR applies, the exporter must sign these documents electronically.

Annual Reports

(i) Data Items:

Under the proposed §262.83(g), as under the existing §262.87(a), LQG exporters must list OECD waste codes for all shipments in addition to RCRA waste codes as part of each annual report. The proposed rule will also require electronic submittal of all annual reports of exports of hazardous waste and CRTs for recycling. This will require each annual report to be signed electronically.

(ii) Respondent Activities:

U.S. exporters must enter OECD waste codes into each annual report. Exporters must also electronically sign each annual report.

Additional Reports

(i) Data Items:

Under the proposed §262.83(b)(8), as under the existing §262.53(d) and §262.83(d)(14), upon request by EPA, an exporter must continue to submit to EPA any additional information which a country of import requests in order to respond to a notification. The proposed rule will not change this requirement or the manner through which such information is submitted to EPA.

(ii) Respondent Activities:

U.S. exporters must prepare and submit additional information to EPA upon request. This is the same as in the baseline.

Contracts

(i) Data Items:

Under the proposed rule, contracts must be signed between exporters of hazardous waste and receiving facilities specifying the parties relevant to each shipment and the various legal responsibilities of each party involved. Currently, there are no requirements for contracts in the U.S. under 40 CFR Part 262 Subpart E. However, Canadian regulations require that such contracts be maintained. EPA therefore assumes that shipments to Canada will not experience any additional burden as a result of this provision. EPA assumes that other entities involved in the foreign trade of hazardous waste currently sign similar contracts that would satisfy the proposed requirements, and therefore estimates no additional incremental burden for these shipments.

(ii) Respondent Activities:

None.

Acknowledgement of Consent

(i) Data Items:

Under the existing §262.52(c) and §266.80(a), exporters are required to provide a copy of the EPA Acknowledgment of Consent for each shipment to the transporter transporting the shipment for export. The proposed rule eliminates this requirement. Thus, this would result in a cost savings for U.S. exporters.

(ii) Respondent Activities:

U.S. exporters no longer need to provide a copy of the EPA Acknowledgment of Consent to the transporter.

Exception Reports

(i) Data Items:

Whereas exception reports for Subpart E are currently based on the RCRA manifest, under the proposed §262.83(h), exception reports will be based on either RCRA manifests or OECD movement documents for shipments to Canada, Mexico and non-OECD countries. The proposed rule also requires exception reports to be submitted electronically to EPA. To the extent that CROMERR applies, this will require that each exception report be signed electronically.

(ii) Respondent Activities:

U.S. exporters must prepare and submit the required exception report if any of the conditions listed in §262.83(h) occurs.

Movement/Tracking Document

(i) Data Items:

Under the proposed §262.83(d), each time a U.S. exporter ships hazardous waste to a foreign country – including Canada, Mexico, and non-OECD countries – the exporter is required to complete and submit to the carrier a movement/tracking document. The movement document must include a signed certification, as well as all information required for notification. For shipments to and from Canada, exporters may use the existing Canadian movement document to fulfill this requirement. U.S. exporters must maintain copies of the movement documents they receive from foreign receiving facilities to confirm receipt for three years.

Under the proposed rule, U.S. receiving facilities must send a copy of the signed OECD movement document to EPA electronically, to the foreign exporter of the waste, and to the relevant authorities of the exporting country and any transit countries within three days of receiving a shipment of hazardous waste. Importers must also maintain a signed copy of the movement document for three years. Importers receiving waste from other OECD countries must already comply with this requirement and will experience no increase in cost as a result of this provision. Similarly, importers receiving waste from Canada can use the Canadian movement document to fulfill this requirement and will experience no additional cost burden to complete the document, but will incur costs to send a copy to EPA and Environment Canada. To the extent CROMERR applies, U.S. importers must submit copies of the movement document to EPA electronically with an electronic signature.

(ii) Respondent Activities:

U.S. exporters shipping hazardous waste to Mexico and non-OECD countries must complete and submit a movement/tracking document to the carrier, and maintain copies of the movement document they receive to confirm receipt from the foreign receiving facility for three years. U.S. importers must send a copy of the signed OECD movement document to EPA electronically, to the foreign exporter of the waste, and to the relevant authorities of the exporting country within three days of receiving a shipment of hazardous waste. To the extent CROMERR applies, electronic submittal of the copies must be done with an electronic signature. U.S. importers from Mexico and non-OECD countries must also maintain a signed copy of the movement document for three years.

Confirmation of Recovery or Disposal

(i) Data Items:

Under the existing §262.83(e), all U.S. recovery facilities must provide a confirmation of recovery or disposal to the exporter and send copies to the competent authorities of the countries of export and import. The confirmation of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste. U.S. importers receiving shipments from Canada are already required to prepare and send a confirmation of recovery or disposal to the foreign exporter under Canadian regulations, and therefore only incur costs to send copies of this document to EPA and Environment Canada. Furthermore, under the proposed §262.83(f)(5) EPA will require export contract terms that specify foreign receiving facilities sending confirmations of recycling/disposal that will allow use of the Canadian confirmation of recycling or disposal, and under the proposed §262.84(g) U.S. importers will be required to provide a confirmation of recovery/disposal and will be able to use the Canadian confirmation of recycling/disposal to use one document to list multiple shipments identified by their movement document number, waste line number, and the date of recycling or disposal. The proposed rule will require that U.S. importers submit copies of the confirmation of recovery or disposal to EPA electronically, and to the extent CROMERR applies, will need to include an electronic signature.

U.S. exporters must also maintain a copy of the confirmation of recovery/disposal from the foreign importing facility for three years. U.S. importers will also need to maintain a copy of the confirmation of recovery/disposal for three years. While exporters and importers exchanging waste with OECD countries other than Canada and Mexico are already subject to this requirement under existing regulations, exporters and importers involved in the foreign trade of hazardous waste with Mexico, Canada, and non-OECD countries will experience an increase in cost burden as a result of these additional recordkeeping requirements.

(ii) Respondent Activities:

U.S. importers must provide a confirmation of recovery to the exporter, EPA, and the competent authority of the country of export. Copies must be submitted to EPA electronically, and to the extent CROMERR applies, will need to include an electronic signature. U.S. exporters must receive and maintain the confirmation of recovery/disposal provided by the recovery facility for three years, and U.S. importers must maintain a copy of the confirmation of recovery/disposal for three years.

Return of Wastes

(i) Data Items:

Under the existing §262.54(g), when a manifested shipment of hazardous waste cannot be completed, the primary exporter must (1) instruct the transporter to either return the shipment to the exporter or to an alternative facility in the United States, and (2) submit an exception report to EPA. The proposed rule does not change any of these requirements with the exception of allowing the alternate facility to be in the country of import if allowed by the country of import, specifying that the instructions to the transporter be made via mail, e-mail, or fax (so that a record of the instructions exists), and requiring that the shipments be returned within 90 days of receiving notification from the country of import or transit.

(ii) Respondent Activities:

U.S. exporters must instruct the transporter to either return the shipment to the exporter or to an alternative facility in the country of import (if allowed by the country of import) or the United States.

Exemption of Wastes Destined for Laboratory Analysis

(i) Data Items:

Under the existing §262.82(g), import and export shipments of RCRA hazardous wastes with OECD countries other than Canada and Mexico are exempt from the Subpart H requirements if they are explicitly destined for laboratory analysis to assess their physical/chemical characteristics or to determine their suitability for recovery operations and no more than 25kg. Under existing regulations in 40 CFR Part 261, domestic shipments of

hazardous waste sent for laboratory analysis are exempt from hazardous waste requirements if they fall within certain weight limits. Existing weight limits for exempted waste shipments range from 1kg for acute hazardous waste to 10,000kg of media contaminated with non-acute hazardous waste. The proposed rule makes exporters and importers shipping samples for laboratory analysis to and from Canada, Mexico, and non-OECD countries subject to the additional limitation of samples weighing no more than 25kg to be exempt from export and import requirements. As a result, currently-exempt shipments may no longer be exempt. EPA estimates that four previously-exempted shipments (two export shipments and two import shipments) will no longer be exempted each year after the implementation of the proposed rule. EPA is requesting comment on the number of currently exempt shipments that will be impacted by this change.

(ii) Respondent Activities:

U.S. exporters shipping samples less than the domestic limits in 40 CFR Part 261 but greater than 25kg for laboratory analysis to Canada, Mexico, or a non-OECD country will now need to comply with the subpart H requirements, including submitting an export notice, obtaining an AOC, filing the additional items in AES to validate consent for the sample shipment, completing and signing a movement/tracking document, and receiving and maintaining a confirmation of recovery. Transporters of these samples will need to comply with hazardous waste manifest and movement document requirements to obtain, sign, and maintain a copy of the RCRA manifest and obtain and sign the movement/tracking document. U.S. importers receiving samples less than the domestic limits in 40 CFR Part 261 but greater than 25kg for laboratory analysis from Canada, Mexico, or a non-OECD country will now need to comply with the subpart H requirements, including signing the RCRA manifest and submitting the RCRA manifest to EPA, signing the movement/tracking document and providing a copy to the exporter, EPA, and competent authority of the country of export to confirm receipt, and sending a confirmation of recovery to the exporter, EPA, and foreign authority.

EPA ID

(i) Data Items:

The proposed rule will require all recognized traders involved in the arrangement of transportation of hazardous waste to obtain an EPA ID number. EPA assumes that one percent of all importers and exporters are recognized traders, or about four entities, and will be impacted by the proposed rule. EPA also assumes the number of recognized traders is split equally among exporters and importers.

(ii) Respondent Activities:

Recognized traders of hazardous waste must obtain an EPA ID number from their authorized state or from EPA.

AES Requirements

(i) Data Items:

Under the proposed rule in subpart H, exporters will be required to fill in between two and five additional fields to validate consent as part of their existing filing in CBP's AES. The proposed rule would also add the same filing requirements for CRTs exported for recycling under 40 CFR 261.39.

(ii) Respondent Activities:

Exporters of CRTs for recycling and hazardous waste for recycling or disposal must file between two and five additional fields to validate consent as part of their existing AES filing.

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

5(a) Agency Activities

WIETS Development

To implement the proposed rule, the most significant cost for EPA will be the development and maintenance of the electronic submittal system. These costs are uncertain; therefore this ICR presents Agency costs as a range. Any costs of the CDX system are not described in this ICR because it exists now, would still exist absent the rule, and was developed to facilitate electronic submittal of data between EPA data systems and other entities such as the regulated community and other governments. However, EPA estimates that the initial development of enhancements to WIETS to facilitate electronic submittal of export and import reports (specifically related to the proposed rule) will cost between \$188,750 and \$311,250.⁷ EPA also estimates that it will require between approximately 700 and 1,170 labor hours for staff technicians to implement the system at a cost ranging from \$39,076 to \$65,127.⁸ This ICR assumes that the development costs are entirely incurred in the first year of the rule's promulgation and the system will have a useful lifespan of 20 years. EPA further estimates that the recurring O&M costs for the enhancements to WIETS will be between \$96,750 and \$161,250 per year after its development. Finally, EPA estimates that it will require between approximately 1,500 and 2,500 hours to manage the enhancements to WIETS after their implementation at a cost ranging from \$83,015 to \$138,359 per year.

Since the electronic submittal system will provide technical guidance and tracking information to users, EPA estimates it will no longer have to respond to exporter inquiries related

⁷ EPA cost estimates for the development and operation & maintenance of the electronic system are derived from the Excel Workbook "EPA FTEs and Costs for import-export rule RANGES Jan 8 2015.docx" provided by Phuc Phan of EPA's Office of Resource Conservation and Recovery on January 15, 2015.

⁸ EPA labor costs are estimated using the loaded hourly labor rates described in Chapter 3 of the Economic Assessment for the proposed rule.

to the submittal of export notices. EPA estimates that such inquiries require 1,000 hours of Agency staff time each year. Furthermore, electronic submittal will reduce the Agency burden associated with manual entry of export notices. EPA receives approximately 1,684 notices per year and requires one hour to manually enter information from each export notice into WIETS. Therefore, Agency staff will experience a cost savings of 1,000 hours per year for avoided inquiries and 1,684 hours per year for avoided data entry. EPA also estimates that electronic submittal will eliminate the need for staff to manually enter information from export annual reports into WIETS. EPA receives approximately 378 export annual reports each year and takes about four hours to receive and process reports into a database. Therefore, EPA estimates that Agency staff will also experience a cost savings of 1,512 hours for avoided data entry associated with export annual reports.

Movement/Tracking Document

Under the proposed §262.83 and §262.84, exporters and importers that trade with Canada, Mexico, and non-OECD countries will have to comply with movement document requirements. As discussed above, exporters and importers that trade with other OECD countries are already required to submit signed movement documents to EPA. EPA will need to receive and record movement documents from importing countries for U.S. exports and receiving facilities for U.S. imports.

Confirmation of Recovery or Disposal

EPA will need to review and maintain a confirmation of recovery or disposal for hazardous waste shipments between the United States and Canada, Mexico, and non-OECD countries.

EPA ID

For recognized traders not located in authorized states that issue EPA ID numbers, EPA will need to review letters from recognized traders of hazardous waste requesting EPA identification numbers, enter this information into a database, generate an EPA ID number, and send it to each requesting recognized trader.

5(b) Collection Methodology and Management

The collection and management of the information submitted to EPA is stored by EPA in file cabinets and/or electronically to be compiled in an annual status report. In addition, the information is collected and stored for possible future use in enforcement actions. EPA uses electronic equipment such as personal computers and applicable database software, when appropriate.

5(c) Small Entity Flexibility

Some respondents will be small organizations. In certain cases, they will be able to obtain waivers to avoid reporting requirements associated with electronic submission of documents to EPA. Small entities may also incur fewer costs because they can complete the recordkeeping and reporting requirements in less time than large organizations because they export or import smaller quantities of hazardous waste. However, the size of the organization does not always reflect the amount of time needed to complete documents, submit reports, or maintain records. EPA believes that the information to be collected is the minimum amount necessary to fulfill the purpose of the proposed rule. Furthermore, the decision to export or import hazardous waste is voluntary. Thus, no business, small or otherwise, is required to export or import its hazardous waste. Therefore, there is no mandatory burden on the regulated community, including small businesses.

5(d) Collection Schedule

Under the proposed rule, export/import notifications, exception reports, documentation of EPA's consent to import, confirmations of recovery/disposal, and shipment tracking documents are generated and sent to EPA on an occurrence-specific basis for which there is no formalized schedule. The submission of information under this collection is initiated by the respondents. U.S. exporters must file with EPA a detailed annual report on hazardous waste exports, including a signed certification, by March 1st of each year.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA assessed the potential cost impacts of the proposed rule, including:

- Submittal of notices to EPA on behalf of foreign exporters by U.S. importers (for RCRA hazardous wastes not controlled as hazardous waste exports by the country of export).
- Submittal of additional information with each export notice.
- Listing of OECD waste codes for all shipments in each export annual report of hazardous wastes.
- Development of contracts between U.S. exporters of hazardous waste and foreign receiving facilities, and between U.S. importers of hazardous waste and foreign exporters.
- Removal of the requirement for exporters to provide a copy of EPA's Acknowledgment of Consent to transporters for each shipment.
- Movement document creation for exporters of hazardous waste.
- Transporters signing movement documents for import and export shipments.
- U.S. receiving facilities' signing and distribution of the OECD movement document to EPA, the generator of the waste, and the relevant authorities of the exporting country.

- U.S. receiving facilities' preparation and shipment of the confirmation of recovery or disposal to EPA, the exporter, and the relevant authority in the country of origin for each shipment received.
- U.S. exporters' maintenance of a copy of the confirmation of recovery or disposal from the foreign importing facility.
- The return of hazardous waste shipments to U.S. exporting facilities or alternate facilities in the country of import (if allowed by the country of import) or the United States.
- The exemption of various wastes destined for laboratory analysis from hazardous waste requirements when shipments contain no more than 25kg.
- The obtaining of EPA identification numbers by recognized traders of hazardous waste.
- Requirements for exporters of hazardous waste for recycling/disposal and CRTs for recycling to enter new data elements into the existing AES.
- CDX registration.

6(b) Estimating Respondent Costs

Labor Costs

For purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$139.53 for managerial staff, \$67.40 for technical staff, and \$36.05 for clerical staff. These hourly labor costs were obtained from the following source:

- Hourly Wage: Bureau of Labor Statistics, occupational earnings data for May 2013.^{9,10}

Annual Capital and Operation & Maintenance (O&M) Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. O&M costs are those costs associated with paperwork requirements incurred continually over the life of the ICR. They are defined by the EPA as "the recurring dollar amount of costs associated with O&M or purchasing services."

O&M costs are those costs associated with materials and services procured for the information collection requirements included in this ICR. For this ICR, O&M costs include the following: (1) postage to mail a five-ounce package by certified mail (\$2.09 for postage, \$3.30 for the certified-mail fee, and \$0.16 for a 9 x 12 manila envelope = \$5.55); (2) postage to mail a standard domestic letter (\$0.49 for first class postage and \$0.03 for a standard envelope = \$0.52); (3) postage for a standard international letter (\$1.15 for first-class postage and \$0.03 for a

⁹ Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May 2013, accessed at http://www.bls.gov/oes/current/oes_nat.htm on April 24, 2014.

¹⁰ To estimate average annual labor costs, EPA relies on national average wage data reported by the U.S. Bureau of Labor Statistics for a full time employee working 40 hours a week multiplied by a loaded wage rate of 150 percent, which represents average private industry fringe benefits (e.g. paid time off, health benefits, retirement benefits, other legally required benefits, and payroll taxes) and overhead rates (e.g. general and administrative, fixed overhead, insurance, and profit).

standard envelope = \$1.18); (4) photocopying (\$0.11 per page); and (5) fax services (\$0.12 per page).

6(c) Estimating Agency Burden and Costs

For Agency burden and costs, EPA estimates an average hourly labor rate of \$65.58 for managerial staff (GS-14, Step 1), \$55.50 for technical staff (GS-13, Step 1), and \$21.25 for clerical staff (GS-5, Step 1).¹¹ To derive these hourly estimates, EPA referred to the *General Schedule (GS) Salary Table 2014*. This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal government. EPA applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly labor rates.

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

In this section, EPA first describes the respondent universe affected by the new information collection requirements resulting from the final action. EPA then estimates the *annual aggregate burden* to respondents under the proposed rule and existing RCRA information collection requirements. The universe estimates and assumptions used in the development of this ICR are based on the economic assessment developed for this rulemaking: “Assessment of the Potential Costs, Benefits, and Other Impacts of the Hazardous Waste Export-Import Revisions Rule” (hereinafter referred to as the Cost Assessment document for the proposed rule), which is available in the docket for the rule.

(1) Respondent Universe

In Exhibits 1 and 2 below, EPA provides estimates of the annual number of importers and exporters (and export and import shipments) that will be subject to the paperwork requirements in the proposed rule.

¹¹ See Chapter 3 of the Economic Assessment for the proposed rule.

Exhibit 1

Number of Importers and Shipments Potentially Affected by the Proposed Rule

Country of Origin ¹	Number of Affected Entities		Average Number of Shipments per Year ^{7,8}
	U.S. Importers	U.S. Transporters ⁶	
Canada ^{2,3,4,5}	35	35	69
Mexico ^{2,3,5}	11	11	31
OECD Countries	2	2	31
Non-OECD Countries	3	3	37
Total	51	51	57

Notes:

1. Four importers received waste from two or more countries. Therefore, there are 45 unique importers, rather than 51 listed above. However, this exhibit parses out the importers that receive from more than one country into each of their respective origins to accurately reflect the average number of shipments sent to each importer. Depending on the context, the remainder of this analysis may similarly parse out importers that receive from more than one country separately to accurately estimate costs associated with receiving from alternative destinations. That is, this assessment often uses the 51 count of importers and not the 45 unique importers.
2. While Canada and Mexico are OECD countries, under existing regulations there are different requirements for the foreign trade of hazardous waste with these countries compared with other OECD countries. Therefore, EPA estimates impacts to importers (and exporters) separately for trade with Canada and Mexico versus other OECD countries.
3. Two importers received shipments from Canada and Mexico.
4. A single importer received shipments from England, Germany, and Canada.
5. A single importer received shipments from Malaysia, the Philippines, Canada, Mexico, and Japan.
6. EPA estimates that there is one U.S. transporter for each U.S. importer.
7. Average number of shipments based on EPA RCRA manifests for import shipments for 2011. This is not an average of the number of affected entities columns.
8. EPA estimates that two imported shipments per year are destined for laboratory analysis.

Exhibit 2

Number of Exporters and Shipments Potentially Affected by the Proposed Rule

Destination Country ¹	Number of Affected Entities		Average Number of Shipments per Year ^{5,6}
	U.S. Exporters	U.S. Transporters ⁴	
Canada ^{2,3}	326	326	79
Mexico ^{2,3}	24	24	964
OECD Countries	31	31	80
Non-OECD Countries	2	2	13
Total	383	383	134
Notes: <ol style="list-style-type: none"> Four exporters shipped waste to two or more countries. Therefore, there are 378 unique exporters, rather than 383 listed above. However, this exhibit parses out the exporters that ship to more than one country into each of their respective destinations to accurately reflect the average number of shipments sent to each destination. Depending on the context, the remainder of this analysis may similarly parse out exporters that ship to more than one country separately to accurately estimate costs associated with shipping to alternative destinations. In other words, this RIA sometimes uses the 383 count of exporters and not the 378 unique exporters where appropriate. While Canada and Mexico are OECD countries, under existing regulations there are different requirements for the foreign trade of hazardous waste with these countries compared with other OECD countries. Therefore, EPA estimates impacts to exporters (and importers) separately for trade with Canada and Mexico versus other OECD countries. One exporter sent shipments to both Canada and Mexico. EPA estimates that there is one U.S. transporter for each U.S. exporter. Average number of shipments based on EPA Export Annual Reports for 2011. This is not an average of the number of affected entities columns. EPA estimates that two exported shipments per year are destined for laboratory analysis. 			

(2) Annual Respondent Hour and Cost Burden under the Proposed rule

Annual respondent hour and cost burden estimates are summarized below and itemized in the exhibits at the end of this document.

(a) Reading the Regulations

EPA expects that all 378 exporters and 45 importers will need to familiarize themselves with the requirements of the proposed rule.¹² EPA assumes that reading and understanding the proposed rule will require one hour of a manager's time and 2.5 hours of a technician's time.¹³ This is equivalent to an upfront cost of \$308.03 per facility.

¹² For reporting purposes, EPA estimates that if an exporter ships waste to both Canada and Mexico, half of the costs are incurred for shipments to Canada and half are incurred for shipments to Mexico. Therefore, costs are proportionally distributed (by country) for entities that trade with more than one country.

¹³ Page B-1 of the Cost Assessment for the Proposed Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

(b) CDX Registration

EPA assumes that exporters and importers will register to use the CDX system starting in the first year of the rule's promulgation. The average initial registration cost per entity is estimated to be \$56.91 per exporter (assuming an average of 5 registrants per exporter) and \$53.50 per importer (assuming an average of 4.7 registrants per importer), including the cost of printing, signing, and mailing an "electronic signature agreement" to EPA if the registrant fails the system's identity-proofing requirements. The estimated recurring costs following the promulgation of the rule are \$6.94 per exporter and \$6.52 per importer, including the cost to register new users due to employee turnover and allow existing users to update their information each year.

(c) Export and Import Notices

Notification cost burdens will vary under the proposed rule for exports to Canada, Mexico, non-OECD countries, and OECD countries. During the first year of the proposed rule, additional data entry costs per U.S. exporter will be as follows: \$56.73 (Canada); \$48.04 (Mexico); and \$33.70 (non-OECD). In each subsequent year, U.S. exporters will experience the following average costs: \$22.69 (Canada), \$19.22 (Mexico), and \$13.48 (non-OECD). U.S. exporters to all countries will incur a cost burden of \$0.56 to electronically sign each notice submitted electronically. U.S. importers receiving shipments from Mexico will face incremental notification costs of \$1,317.98 per notice in the first year, and \$534.54 in each subsequent year.

The removal of the one-time notification requirement in the proposed rule will also result in cost savings of \$37.48 for each affected U.S. importer. In addition, the electronic submittal of import manifests to EPA will result in materials-related cost savings of \$0.74 per shipment for all U.S. importers.

(d) Re-notification

Under the proposed rule, EPA estimates that 32 percent of export notices per year (approximately 290 in total) will require re-notification each year. The average costs per exporter for this activity are as follows: \$0.46 (Canada); \$0.26 (Mexico); \$0.18 (OECD); and \$0.29 (non-OECD). Electronic submittal of re-notifications will result in materials-related cost savings for U.S. importers of \$0.52 for each submission.

(e) Annual Reports

Annual reporting requirements under the proposed rule are estimated to result in annual costs per exporter of \$0.56 per submission (one per year) to provide an electronic signature. In addition, the electronic submittal of annual reports will result in materials-related cost savings of \$5.55 per notice for all U.S. exporters.

(f) Additional Reports

EPA estimates no change in exporter burden related to requirements for additional reports.

(g) Contracts

EPA assumes that other entities involved in the foreign trade of hazardous waste currently sign similar contracts that would satisfy the proposed requirements, and therefore estimates no additional incremental burden for these shipments.

(h) Acknowledgment of Consent to Transporter

The proposed rule eliminates the requirement that exporters provide a copy of the EPA Acknowledgment of Consent to transporters. This generates the following per-entity savings for exporters: \$725.01 (Canada); \$8,896.28 (Mexico); and \$120.02 (non-OECD).

(i) Exception Reports

This component of the proposed rule will burden exporters with the incremental requirement of an electronic signature for each submission, leading to a cost burden of \$0.56 per affected exporter. Electronic submission of exception reports will also save U.S. exporters \$0.52 in materials-related costs for each report submitted to EPA.

(j) International Movement/Tracking Document

U.S. exporters to Mexico and non-OECD countries are estimated to incur incremental reporting costs of \$52.28 per shipment, for a total per-entity cost of: \$50,371.32 (Mexico) and \$679.58 (non-OECD). U.S. imports from Canada, Mexico, and non-OECD countries will also face an incremental reporting burden, estimated on a per-entity basis to be: \$120.17 (Canada), \$2,251.39 (Mexico) and \$2,671.47 (non-OECD). Electronic submission of the movement document by U.S. importers from OECD countries will result in materials-related cost savings of \$0.52 per submission.

(k) Confirmation of Recovery or Disposal

U.S. exporters to Canada, Mexico, and non-OECD countries are estimated to incur incremental costs per shipment under this requirement, yielding a per entity cost of: \$283.09 (Canada); \$3,473.72 (Mexico); and \$46.87 (non-OECD).

U.S. importers from Canada, Mexico, and non-OECD countries will also face an incremental reporting burden to send a confirmation of recovery or disposal to the exporter, EPA, and competent authority of the country of export. The average cost burden per entity is estimated as follows: \$1,752.88 (Canada); \$791.16 (Mexico); and \$938.78 (non-OECD). All importers will experience an additional cost of \$0.56 to electronically sign each confirmation of recovery or disposal.

(l) Return of Wastes

EPA does not estimate any incremental burden resulting from changes to this provision.

(m) Exemption of Wastes Destined for Laboratory Analysis

EPA estimates that each shipment no longer qualifying for this exemption will cost exporters \$55.33, importers \$94.90, and transporters \$4.95. Exporters will also experience \$9.01 in cost savings per shipment that is no longer exempt. A total of two import shipments and two export shipments per year are expected to no longer be exempt across all shipments to and from Canada, Mexico, and non-OECD countries.

(n) Automated Export System Filing Requirements

No change in burden is estimated relating to this provision.

(o) Obtain EPA Identification Numbers

Obtaining an EPA identification number is estimated to cost \$37.48 for each recognized trader of hazardous waste.

6(e) Bottom Line Burden Hours and Costs

(1) Respondent Tally

Exhibit 22 reports the number of respondents that must comply with information collection activities under the proposed rule. Exhibit 23 reports the total annual respondent burden and costs associated with the aforementioned new information collection activities. The exhibit shows that the total annual respondent burden under the proposed rule during the first year of its implementation, including the cost of reading the rule, is estimated to be 44,701 hours and \$1,249,747. In each subsequent year, the respondent burden is estimated to be 42,467 hours and \$1,067,834. In each year, cost savings associated with the proposed rule are estimated to be \$454,752.56 across all respondents. For the affected hazardous waste generator entities, the average number of responses per affected entity is estimated to be 7.8 in the first year after the promulgation of the rule and 5.3 per year in each subsequent year. Thus, the average number of responses per entity in the first three years of the rule is 6.1 per year. Finally, Exhibit 24 reports the average annual private industry and Agency burden and cost estimates for the first three years of the rule.

	Respondents	Hours	O&M Cost	Total Cost
Year 1	1,305	44,701		\$1,249,747
After Year 1		42,467		\$1,067,834
Annual Total	1,305	43,212	\$0	\$1,128,472

(2) Agency Tally

The estimated annual cost to the Agency is \$908,708.

	Total Cost
Year 1 (High End)	\$959,968.66
After Year 1 (High End)	\$883,078.20
Annual Average Total (High End)	\$908,708.35

Estimated Agency costs and cost savings for the various information collection activities under the proposed rule, as delineated in Section 5(a) above, are presented in Exhibits 20 and 21 below. The exhibits show that the total annual Agency burden under the proposed rule is estimated to include between \$188,750 and \$311,250 in development costs for enhancements to WIETS, between \$39,076 and \$65,127 in development-related labor costs, between \$96,750 and \$161,250 in annual operations and maintenance costs, and between \$83,015 and \$138,359 in labor costs required for operation and maintenance activities. EPA will also incur additional costs for processing movement documents, confirmations of recovery, and requests for EPA IDs from recognized traders. These costs are estimated to be \$583,592 in the first year of the rule, and \$583,469 in each subsequent year. EPA is also expected to experience a cost savings of \$232,895 each year since the electronic system will eliminate the need to manually enter export notice and export annual report data and answer exporter inquiries via phone.

6(f) Reasons for Change in Burden

As aforementioned, the new paperwork requirements under the proposed rule are necessary to make existing export and import related requirements more consistent with the current import-export requirements required for shipments between OECD member countries; enable electronic submittal of all export and import-related documents; and enable electronic submittal and validation of consent in the AES for export shipments subject to RCRA export consent requirements prior to exit.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average about 5 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-RCRA-2015-0147, which is available for online viewing at www.regulations.gov, or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2015-0147 and OMB Control Number 2050-NEW in any correspondence.

Exhibit 3
Reading the Rule
(In the first year of Rule Implementation Only)

Information Collection Activity	Hours and Costs Per Entity							Total Hours and Costs		
	Managerial (\$139.53/hr)	Technical (\$67.40/ hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ¹	Number of Respondents ²	Total Hours	Total Cost
U.S. Exporters										
Reading the rule	1	2.5	0	3.5	\$308.03	\$0.00	\$308.03	378	1,323	\$116,430.37
U.S. Importers										
Reading the rule	1	2.5	0	3.5	\$308.03	\$0.00	\$308.03	45	157	\$13,858.04
TOTAL - YEAR 1								423	1,480	\$130,288.41

Sources:

(1) Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

(2) Unique entity counts are based on U.S. EPA Export and Import Annual Reports, 2011.

Exhibit 4
CDX Registration Costs

Information Collection Activity	Hours and Costs Per Registrant							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost	Number of Respondents	Number of Registrants ¹	Total Hours	Total Cost
U.S. Exporters											
Initial registration - Year 1	0	0.15	0	0.15	\$10.11	\$0.00	\$10.11	378	1,894	284	\$19,145.61
New registrations - every year After Year 1	0	0.15	0	0.15	\$10.11	\$0.00	\$10.11	378	208	31	\$2,106.02
Update information - every year After Year 1	0	0.02	0	0.02	\$1.35	\$0.00	\$1.35	378	189	4	\$255.27
Electronic signature if registrant fails identity (proofing requirements) - Year 1	0	0.0833	0	0.0833	\$5.61	\$0.63	\$6.24	378	379	32	\$2,365.05
Electronic signature if registrant fails identity-proofing requirements - After Year 1	0	0.0833	0	0.0833	\$5.61	\$0.63	\$6.24	378	42	3	\$260.16
U.S. Importers											
Initial registration - Year 1	0	0.15	0	0.15	\$10.11	\$0.00	\$10.11	45	212	32	\$2,142.34
New registrations - every year After Year 1	0	0.15	0	0.15	\$10.11	\$0.00	\$10.11	45	23	3	\$235.66
Update information - every year After Year 1	0	0.02	0	0.02	\$1.35	\$0.00	\$1.35	45	21	0	\$28.56
Electronic signature if registrant fails identity (proofing requirements) - Year 1	0	0.0833	0	0.0833	\$5.61	\$0.63	\$6.24	45	42	4	\$264.64
Electronic signature if registrant fails identity-proofing requirements - After Year 1	0	0.0833	0	0.0833	\$5.61	\$0.63	\$6.24	45	5	0	\$29.11
TOTAL - YEAR 1								423		351	\$23,917.64
TOTAL - AFTER YEAR 1								423		43	\$2,914.78

Source:

(1) EPA estimates that there are 4.7 registrants per respondent for importers and 5 registrants for exporters.

Exhibit 5
Notification Costs

Information Collection Activity	Hours and Costs Per Notification							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost ^{1,3}	O& M Cost	Total Cost	Number of Resp. ²	Number of Notices	Total Hours	Total Cost
U.S. Exporters - Canada											
Submit additional data fields as part of notice of intent to export - Year 1	0	0.33	0	0.33	\$22.24	\$0.00	\$22.24	326	2.6	274	\$18,495.20
Submit additional data fields as part of notice of intent to export - After Year 1	0	0.132	0	0.132	\$8.90	0	\$8.90	326	2.6	110	\$7,398.08
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	326	2.6	7	\$465.18
U.S. Exporters – Mexico											
Submit additional data fields as part of notice of intent to export - Year 1	0	0.5	0	0.5	\$33.70	\$0.00	\$33.70	24	1.4	17	\$1,152.97
Submit additional data fields as part of notice of intent to export - After Year 1	0	0.2	0	0.2	\$13.48	0	\$13.48	24	1.4	7	\$461.19
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	24	1.4	0.3	\$19.14
U.S. Exporters - non-OECD											
Submit additional data fields as part of notice of intent to export - Year 1	0	0.5	0	0.5	\$33.70	\$0.00	\$33.70	2	1.0	1	\$67.40
Submit additional data fields as part of notice of intent to export - After Year 1	0	0.2	0	0.2	\$13.48	0	\$13.48	2	1.0	0.4	\$26.96
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	2	1.0	0.0	\$1.12
U.S. Exporters – OECD											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	31	1.6	0	\$27.88
U.S. Exporters - Other⁴											
Submit additional data fields as part of notice of intent to export - Year 1	0	varies	0	0	varies	\$0.00	varies	298	varies	248	\$16,706.71
Submit additional data fields as part of notice of intent to export - After Year 1	0	varies	0	0	varies	\$0.00	varies	298	varies	99	\$6,682.68
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	298	varies	6	\$428.74
U.S. Importers - Mexico											
Submit export notices on behalf of foreign exporters - Year 1	0.1	1.8	0.1	2	\$138.88	\$6.10	\$144.98	11	9.1	200	\$14,497.75
Submit export notices on behalf of foreign exporters - After Year 1	0.04	0.732	0.04	0.812	\$56.36	\$2.44	\$58.80	11	9.1	81	\$5,879.98

Information Collection Activity	Hours and Costs Per Notification							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost ^{1,3}	O& M Cost	Total Cost	Number of Resp. ²	Number of Notices	Total Hours	Total Cost
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	11	9.1	1	\$55.94
TOTAL - YEAR 1								692		755	\$51,918.04
TOTAL - AFTER YEAR 1								692		312	\$21,446.90

Sources:

(1) Cost of import notice from: Supporting Statement for EPA Information Collection Request Number 0820.11 Hazardous Waste Generator Standards (Renewal), March 30, 2011.

(2) Import notice totals from EPA's International Compliance Assurance Division (ICAD), sent via e-mail from Phuc Phan on June 5, 2014.

(3) Electronic signature burden from: Supporting Statement for EPA Information Collection Request Number 2002.05: "Cross-Media Electronic Reporting Rule", June 22, 2011, Office of Environmental Information, U.S. Environmental Protection Agency.

(4) This category includes exporters that submit export notices to EPA but do not subsequently export hazardous wastes during the 12-month notice period. Number of respondents based on 2013 U.S. EPA WIETS data.

Exhibit 6
Notification Cost Savings

Information Collection Activity	Hours and Costs Per Notification							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours ¹	Labor Cost	O&M Cost ³	Total Cost Savings	Number of Respondents	Number of Notices ²	Total Hours	Total Cost Savings
U.S. Importers - Canada											
One-time notice to regional administrator stating intent to import	0.08	0.34	0.08	0.5	\$36.96	\$0.52	\$37.48	35	6	3	\$224.56
Send copy of import manifest to EPA	0.00	0.00	0.00	0	\$0.00	\$0.74	\$0.74	35	2,418	0	\$1,789.32
U.S. Importers - Mexico											
One-time notice to regional administrator stating intent to import	0.08	0.34	0.08	0.5	\$36.96	\$0.52	\$37.48	11	1	1	\$48.45
Send copy of import manifest to EPA	0.00	0.00	0.00	0	\$0.00	\$0.74	\$0.74	11	343	0	\$253.82
U.S. Importers - non-OECD											
One-time notice to regional administrator stating intent to import	0.08	0.34	0.08	0.5	\$36.96	\$0.52	\$37.48	3	0	0	\$9.20
Send copy of import manifest to EPA	0.00	0.00	0.00	0	\$0.00	\$0.74	\$0.74	3	111	0	\$82.14
U.S. Importers - OECD											
One-time notice to regional administrator stating intent to import	0.08	0.34	0.08	0.5	\$36.96	\$0.52	\$37.48	2	0	0	\$5.62
Send copy of import manifest to EPA	0.00	0.00	0.00	0	\$0.00	\$0.74	\$0.74	2	62	0	\$45.88
TOTAL								51		4	\$2,458.99

Source:

- (1) Burden estimate based on burden to obtain a new EPA ID number (similar data submittal process), as taken from: Supporting Statement for EPA Information Collection Request Number 0976.16, "2013 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification, September 2012.
- (2) One-time notices estimated to account for 5 percent of annual import notices. Based on information received from the EPA Regional Offices provided by Alan Barnosky of EPA's Office of Resource Conservation and Recovery.
- (3) Includes cost for mailing one standard envelope.

Exhibit 7
Re-notification Costs

Information Collection Activity	Hours and Costs Per Re-notification							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondents	Number of Renotifications ¹	Total Hours	Total Cost
U.S. Exporters - Canada											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	326	266	2.2	\$148.86
U.S. Exporters - Mexico											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	24	11	0.1	\$6.12
U.S. Exporters - non-OECD											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	2	1	0.0	\$0.36
U.S. Exporters - OECD											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	31	16	0.1	\$8.92
TOTAL								383	294	2	\$164.26

Source:

(1) 32 percent of respondents are estimated to submit re-notifications annually. Based on data from EPA's International Compliance Assurance Division (ICAD) sent via e-mail from Phuc Phan on June 5, 2014.

(2) Supporting Statement for EPA Information Collection Request Number 2002.05: "Cross-Media Electronic Reporting Rule", June 22, 2011, Office of Environmental Information, U.S. Environmental Protection Agency.

Exhibit 8
Re-notification Cost Savings

Information Collection Activity	Hours and Costs Per Re-notification							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondents	Number of Renotifications ¹	Total Hours	Total Cost
U.S. Exporters - Canada											
Submit re-notification to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	326	266	0.0	\$138.37
U.S. Exporters - Mexico											
Submit re-notification to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	24	11	0.0	\$5.69
U.S. Exporters - non-OECD											
Submit re-notification to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	2	1	0.0	\$0.33
U.S. Exporters - OECD											
Submit re-notification to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	31	16	0.0	\$8.29
TOTAL								383	294	0	\$152.69

Source:

(1) 32 percent of respondents are estimated to submit re-notifications annually. Based on data from EPA's International Compliance Assurance Division (ICAD) sent via e-mail from Phun Phan on June 5, 2014

(2) Supporting Statement for EPA Information Collection Request Number 2002.05: "Cross-Media Electronic Reporting Rule", June 22, 2011, Office of Environmental Information, U.S. Environmental Protection Agency

Exhibit 9
Annual Report Costs

Information Collection Activity	Hours and Costs Per Report							Total Hours and Costs		
	Managerial (\$139.53/hr)	Technical (\$67.40/ hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost ¹	O&M Cost	Total Cost	Number of Respondents	Total Hours	Total Cost
U.S. Exporters										
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	378	3	\$211.46
TOTAL								378	3	\$211.46

Source:

(1) Supporting Statement for EPA Information Collection Request Number 2002.05: "Cross-Media Electronic Reporting Rule", June 22, 2011, Office of Environmental Information, U.S. Environmental Protection Agency

Exhibit 10
Acknowledgment of Consent Cost Savings

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost Savings ¹	Number of Respondents	Number of Shipments	Total Hours	Total Cost Savings
U.S. Exporters - Canada											
Find consent document	0	0	0.17	0.17	\$6.13	\$0.00	\$6.13	326	25,600	4,352	\$156,889.60
Copy consent document	0	0	0.08	0.08	\$2.88	\$0.22	\$3.10	326	25,600	2,048	\$79,462.40
U.S. Exporters - Mexico											
Find consent document	0	0	0.17	0.17	\$6.13	\$0.00	\$6.13	24	23,126	3,931	\$141,727.69
Copy consent document	0	0	0.08	0.08	\$2.88	\$0.22	\$3.10	24	23,126	1,850	\$71,783.10
U.S. Exporters - non-OECD											
Find consent document	0	0	0.17	0.17	\$6.13	\$0.00	\$6.13	2	26	4	\$159.34
Copy consent document	0	0	0.08	0.08	\$2.88	\$0.22	\$3.10	2	26	2	\$80.70
TOTAL								352	48,752	12,188	\$450,102.84

Source:

(1) Estimated burden derived from Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

Exhibit 11
Exception Report Costs

Information Collection Activity	Hours and Costs Per Report							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondents	Number of Affected Shipments ¹	Total Hours	Total Cost
U.S. Exporters - Canada											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	326	10	0.08	\$5.59
U.S. Exporters - Mexico											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	24	9	0.07	\$5.05
U.S. Exporters - non-OECD											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	2	0	0.00	\$0.01
U.S. Exporters - OECD											
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	31	1	0.01	\$0.54
TOTAL								383	20	0.17	\$11.17

Source:

(1) Estimated percentage of shipments requiring an exception report based on e-mail from Phuc Phan on June 5, 2014.

(2) Burden estimates from Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

Exhibit 12
Exception Report Cost Savings

Information Collection Activity	Hours and Costs Per Report							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondents	Number of Affected Shipments ¹	Total Hours	Total Cost
U.S. Exporters - Canada											
Mail exception report to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	326	10	0.00	\$5.19
U.S. Exporters - Mexico											
Mail exception report to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	24	9	0.00	\$4.69
U.S. Exporters - non-OECD											
Mail exception report to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	2	0	0.00	\$0.01
U.S. Exporters - OECD											
Mail exception report to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	31	1	0.00	\$0.50
TOTAL								383	20	0.00	\$10.39

Source:

(1) Estimated percentage of shipments requiring an exception report based on e-mail from Phuc Phan on June 5, 2014

Exhibit 13
Movement Document Costs

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost ²	Total Cost ^{1,3}	Number of Respondents	Number of Shipments	Total Hours	Total Cost
U.S. Exporters - Mexico											
Complete movement document	0	0.5	0.5	1	\$51.73	\$0.55	\$52.28	24	23,126	23,126	\$1,208,911.65
U.S. Exporters - non-OECD											
Complete movement document	0	0.5	0.5	1	\$51.73	\$0.55	\$52.28	2	26	26	\$1,359.15
U.S. Importers - Canada											
Send a copy of the movement document to EPA and Environment Canada	0	0	0	0	\$0.00	\$1.18	\$1.18	35	2,418	0	\$2,853.24
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	35	2,418	20.07	\$1,352.68
U.S. Importers - Mexico											
Sign movement document and send a copy to EPA, exporter, foreign authority	0.1	0.5	0.5	1.1	\$65.68	\$2.36	\$68.04	11	343	377	\$23,336.86
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	11	343	2.85	\$191.88
Maintain a signed copy of the movement document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	11	343	34	\$1,236.52
U.S. Importers - non-OECD											
Sign movement document and send a copy to EPA, exporter, foreign authority	0.1	0.5	0.5	1.1	\$65.68	\$2.36	\$68.04	3	111	122	\$7,552.16
Electronic signature	0	0.0083	0	0.0083	\$0.56	\$0.00	\$0.56	3	111	0.92	\$62.10
Maintain a signed copy of the movement document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	3	111	11	\$400.16
TOTAL								75	26,024	23,721	\$1,247,256.39

Source:

- (1) Burden assumptions based on Supporting Statement for EPA Information Collection Request Number 0820.11 Hazardous Waste Generator Standards (Renewal), March 30, 2011.
- (2) For importer movement document requirements assume \$1.15 for international postage and \$0.03 for a standard envelope. Based on USPS price calculator for 1 oz. envelope sent by first-class international letter.
- (3) Burden estimates from Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

Exhibit 14
Movement Document Cost Savings

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost ²	Total Cost ^{1,3}	Number of Respondents	Number of Shipments	Total Hours	Total Cost
U.S. Importers - OECD											
Send a copy of the movement document to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	2	62	0	\$32.24
TOTAL								2	62	0	\$32.24

Source:

(1) Burden assumptions based on Supporting Statement for EPA Information Collection Request Number 0820.11 Hazardous Waste Generator Standards (Renewal), March 30, 2011.

Exhibit 15
Confirmation of Recovery

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost ¹	O&M Cost ²	Total Cost	Number of Resp.	Number of Shipments	Total Hours	Total Cost
U.S. Exporters - Canada											
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	326	25,600	2,560	\$92,288.00
U.S. Exporters - Mexico											
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	24	23,126	2,313	\$83,369.23
U.S. Exporters - non-OECD											
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	2	26	3	\$93.73
U.S. Importers - Canada											
Send a confirmation of recovery to the exporter, EPA and competent authorities of the country of export	0	0.2	0.25	0.45	\$22.49	\$2.88	\$25.37	35	2,418	1,088	\$61,350.71
Electronic signature	0	0.0083	0	0.008 3	\$0.56	\$0.00	\$0.56	35	2,418	20	\$1,352.68
U.S. Importers - Mexico											
Send a confirmation of recovery to the exporter, EPA and competent authorities of the country of export	0	0.2	0.25	0.45	\$22.49	\$2.88	\$25.37	11	343	154	\$8,702.77
Electronic signature	0	0.0083	0	0.008 3	\$0.56	\$0.00	\$0.56	11	343	3	\$191.88
U.S. Importers - non-OECD											
Send a confirmation of recovery to the exporter, EPA and foreign authority	0	0.2	0.25	0.45	\$22.49	\$2.88	\$25.37	3	111	50	\$2,816.35
Electronic signature	0	0.0083	0	0.008 3	\$0.56	\$0.00	\$0.56	3	111	1	\$62.10
U.S. Importers - OECD											
Electronic signature	0	0.0083	0	0.008 3	\$0.56	\$0.00	\$0.56	2	62	1	\$34.68
TOTAL								403	51,686	6,192	\$250,262.12

Source:

(1) Burden estimates based on Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S.

Environmental Protection Agency, May 2009.

(2) Assume \$1.15 for international postage and \$0.03 for a standard envelope. Based on USPS price calculator for 1 oz. envelope sent by first-class international letter.

Exhibit 16
Confirmation of Recovery Cost Savings

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost ²	Total Cost ^{1,3}	Number of Respondents	Number of Shipments	Total Hours	Total Cost
U.S. Importers - OECD											
Send a copy of the movement document to EPA	0	0	0	0	\$0.00	\$0.52	\$0.52	2	62	0	\$32.24
TOTAL								2	62	0	\$32.24

Source:

(1) Burden assumptions based on Supporting Statement for EPA Information Collection Request Number 0820.11 Hazardous Waste Generator Standards (Renewal), March 30, 2011.

Exhibit 17
Laboratory Exemption Costs

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/ hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondents	Number of Affected Shipments ¹	Total Hours	Total Cost
U.S. Exporters - Canada											
Complete and sign movement/tracking document	0	0.5	0.5	1	\$51.73	\$0.00	\$51.73	326	1.1	1.1	\$54.32
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	326	1.1	0.1	\$3.79
U.S. Exporters - Mexico											
Complete and sign movement/tracking document	0	0.5	0.5	1	\$51.73	\$0.00	\$51.73	24	0.9	0.9	\$49.07
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	24	0.9	0.1	\$3.42
U.S. Exporters - non-OECD											
Complete and sign movement/tracking document	0	0.5	0.5	1	\$51.73	\$0.00	\$51.73	2	0.0	0.0	\$0.06
Receive and maintain confirmation of recovery provided by the recovery facility	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	2	0.0	0.0	\$0.00

Exhibit 17 (continued)
Laboratory Exemption Costs

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/ hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O& M Cost	Total Cost ²	Number of Respondent s	Number of Affected Shipments ¹	Total Hours	Total Cost
U.S. Importers - Canada											
Sign movement/tracking document and provide a copy to the exporter, EPA, and competent authorities of the country of export	0.1	0.5	0.5	1.1	\$65.68	\$1.56	\$67.24	35	1.7	1.9	\$113.22
Maintain a copy of the signed movement/tracking document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	35	1.7	0.2	\$6.07
Send a confirmation of recovery to the exporter, EPA, and competent authorities of the country of export	0	0.2	0.25	0.45	\$22.49	\$1.56	\$24.05	35	1.7	0.8	\$40.50
U.S. Importers - Mexico											
Sign movement/tracking document and provide a copy to the exporter, EPA, and competent authorities of the country of export	0.1	0.5	0.5	1.1	\$65.68	\$1.56	\$67.24	11	0.2	0.3	\$16.06
Maintain a copy of the signed movement/tracking document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	11	0.2	0.0	\$0.86
Send a confirmation of recovery to the exporter, EPA, and competent authorities of the country of export	0	0.2	0.25	0.45	\$22.49	\$1.56	\$24.05	11	0.2	0.1	\$5.75
U.S. Importers - non-OECD											
Sign movement/tracking document and provide a copy to the exporter, EPA, and competent authorities of the country of export	0.1	0.5	0.5	1.1	\$65.68	\$1.56	\$67.24	3	0.1	0.1	\$5.20
Maintain a copy of the signed movement/tracking document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	3	0.1	0.0	\$0.28
Send a confirmation of recovery to the exporter, EPA, and competent authorities of the country of export	0	0.2	0.25	0.45	\$22.49	\$1.56	\$24.05	3	0.1	0.0	\$1.86

Exhibit 17 (continued)
Laboratory Exemption Costs

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ²	Number of Respondent s	Number of Affected Shipments ¹	Total Hours	Total Cost
Transporters											
Upon obtaining physical custody of the waste, sign the movement/tracking document	0	0.01	0	0.01	\$0.67	\$0.00	\$0.67	564	4.0	0.0	\$2.70
Maintain a copy of the signed movement/tracking document	0	0	0.1	0.1	\$3.61	\$0.00	\$3.61	564	4.0	0.4	\$14.42
Upon delivery of the waste, obtain signed copy of the movement/tracking document from the OECD country recovery facility	0	0.01	0	0.01	\$0.67	\$0.00	\$0.67	564	4.0	0.0	\$2.70
TOTAL								965		6.0	\$320.26

Source:

(1) Affected shipments based on estimates from Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009. Ratio of OECD imports/exports for lab analysis and total OECD imports/exports.

(2) Burden estimates based on Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

Exhibit 18
Laboratory Exemption Cost Savings

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs			
	Managerial (\$139.53/hr)	Technical (\$67.40/hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost Savings ²	Number of Respondents	Number of Affected Shipments ¹	Total Hours	Total Cost Savings
U.S. Exporters - Canada											
Find and copy acknowledgment of consent document	0	0	0.25	0.25	\$9.01	\$0.00	\$9.01	326	1.1	0.3	\$9.47
U.S. Exporters - Mexico											
Find and copy acknowledgment of consent document	0	0	0.25	0.25	\$9.01	\$0.00	\$9.01	24	0.9	0.2	\$8.55
U.S. Exporters - non-OECD											
Find and copy acknowledgment of consent document	0	0	0.25	0.25	\$9.01	\$0.00	\$9.01	2	0.0	0.0	\$0.01
TOTAL								352	2	1	\$18.03

Source:

(1) Affected shipments based on estimates from Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009. Ratio of OECD imports/exports for lab analysis and total OECD imports/exports.

(2) Burden estimates based on Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

Exhibit 19
EPA Identification Number

Information Collection Activity	Hours and Costs Per Recognized Trader							Total Hours and Costs		
	Managerial (\$139.53/hr)	Technical (\$67.40/ hr)	Clerical (\$36.05/hr)	Total Hours	Labor Cost ¹	O&M Cost	Total Cost	Number of Respondents ²	Total Hours	Total Cost
U.S. Recognized Traders										
Obtain an EPA ID number - Year 1	0.08	0.34	0.08	0.5	\$36.9 6	\$0.52	\$37.48	4	2	\$149.93
TOTAL - YEAR 1								4	2	\$149.93

Source:

(1) Hourly burden estimates from: Supporting Statement for EPA Information Collection Request Number 0976.16, "2013 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification, September 2012.

(2) Estimated number of recognized traders based on EPA guidance on methodology table.

Note: Recognized traders are estimated to account for 1% of all importers and exporters.

Exhibit 20
Agency Costs

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs		
	Managerial (\$65.58/hr)	Technical (\$55.50/hr)	Clerical (\$21.25/hr)	Labor Cost ¹	Capital Cost	O&M Cost	Number of Resp.	Total Hours	Total Cost
Movement Document²									
Receive and record tracking document from importing country (exports)	222.6	0.00	0.00	\$14,600	\$0.00	\$0.00	26	5,788	\$379,600.19
Receive and record tracking document from importing facility (imports)	16.21	0.00	0.00	\$1,922	\$0.00	\$0.00	14	227	\$14,887.57
Confirmation of Recovery/Disposal³									
Receive and maintain confirmation of recovery provided by recovery facility (exports and imports)	0.00	0.00	12.87	\$273.54	\$0.00	\$0.00	401	5,162	\$109,690.68
EPA IDs for Recognized Traders of Hazardous Waste⁴									
Review letter requesting EPA ID number and enter this information into a database - Year 1	0.00	0.35	0.00	\$19.43	\$0.00	\$0.00	4	1.40	\$77.71
Generate EPA ID number and send EPA ID number to recognized trader - Year 1	0.00	0.00	0.50	\$10.62	\$0.00	\$0.49	4	2.00	\$44.46
EPA Electronic Reporting System Development⁵									
EPA reporting system development costs (low-end) - Year 1	0.00	0.00	0.00	\$0.00	\$188,750	\$0.00	1	0	\$188,750.00
EPA reporting system development costs (high-end) - Year 1	0.00	0.00	0.00	\$0.00	\$311,250	\$0.00	1	0	\$311,250.00
Labor costs for development, testing, and implementation (low-end) - Year 1	0.00	704.025	0.00	\$39,076	\$0.00	\$0.00	1	704	\$39,076.20
Labor costs for development, testing, and implementation (high-end) - Year 1	0.00	1,173.375	0.00	\$65,127	\$0.00	\$0.00	1	1,173	\$65,127.01
O&M costs (low-end) - After Year 1	0.00	0.00	0.00	\$0.00	\$0.00	\$170,250	1	0	\$170,250.00
O&M costs (high-end) - After Year 1	0.00	0.00	0.00	\$0.00	\$0.00	\$283,750	1	0	\$283,750.00
Labor costs for maintenance (low-end) - After Year 1	0.00	1,495.66	0.00	\$83,015	\$0.00	\$0.00	1	1,496	\$83,015.22
Labor costs for maintenance (high-end) - After Year 1	0.00	2,492.77	0.00	\$138,359	\$0.00	\$0.00	1	2,493	\$138,358.71
TOTAL (LOW-END) - YEAR 1								13,094	\$811,417.86
TOTAL (HIGH-END) - YEAR 1								13,563	\$959,968.66
TOTAL (LOW-END) - AFTER YEAR 1								13,882	\$763,234.71
TOTAL (HIGH-END) - AFTER YEAR 1								14,879	\$883,078.20

Source:

- (1) U.S. Office of Personnel Management, Salary Table 2014-GS, Incorporating the 1% General Schedule Increase, Effective January 2014, Hourly Basic Rates by Grade and Step, accessed at http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/GS_h.pdf on August 18, 2014.
- (2) Supporting statement for EPA information collection request number 0820.11, hazardous waste generator standards (renewal), March 30, 2011.
- (3) Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation. Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency. May 2009.
- (4) Supporting Statement for EPA Information Collection Request Number 0976.16, “2013 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” September 19, 2012.
- (5) EPA reporting system development and operation & maintenance costs from the Word Document “EPA FTEs and Costs for import-export rule RANGES Jan 8 2015.docx” provided by Phuc Phan of EPA’s Office of Resource Conservation and Recovery on January 15, 2015.

Exhibit 21
Agency Cost Savings

Information Collection Activity	Hours and Costs							Total Hours and Costs			
	Managerial (\$65.58/hr)	Technical (\$55.50/hr)	Clerical (\$21.25/hr)	Total Hours	Labor Cost	O&M Cost	Cost Savings	Number of Respondents	Notices per Respondent	Total Hours	Total Cost Savings
EPA											
Avoided data entry for export notifications	0	1	0	1	\$55.50	\$0.00	\$55.50	701	2.4	1,684	\$93,468.74
Avoided hours answering export notice inquiries via telephone	0	1,000	0	1,000	\$55,504	\$0.00	\$55,504	1	N/A	1,000	\$55,504.00
Avoided data entry for annual reports	0	4	0	4	\$222.02	\$0.00	\$222.02	378	N/A	1,512	\$83,922.05
TOTAL										3,213	\$232,894.78

Exhibit 22
(please note some entities are counted in multiple columns)
Estimated Number of Respondents Affected by the Proposed Hazardous Waste Export-Import Rule

Information Collection Activity	Number of Respondents										
	U.S. Exporters (Canada)	U.S. Exporters (Mexico)	U.S. Exporters (non-OECD)	U.S. Exporters (OECD)	U.S. Exporters (Other)	U.S. Importers (Canada)	U.S. Importers (Mexico)	U.S. Importers (non-OECD)	U.S. Importers (OECD)	Trans-porters	TOTAL
Reading the Rule	326	24	2	31	0	35	11	3	2	0	423
CDX Registration	326	24	2	31	0	35	11	3	2	0	423
Notification	326	24	2	31	318	0	11	0	0	0	707
Re-notification	104	8	1	10	0	0	0	0	0	0	123
Annual Report	326	24	2	31	0	0	0	0	0	0	378
Provide Acknowledgment of Consent to Transporter	0	0	0	0	0	0	0	0	0	0	0
Exception Report	326	24	2	31	0	0	0	0	0	0	378
Movement Document	0	0	0	0	0	35	11	3	2	0	45
Confirmation of Recovery or Disposal	0	0	0	0	0	35	11	3	2	0	45
Exemption for Wastes Destined for Laboratory Analysis	326	24	2	0	0	35	11	3	0	564	960
Obtain EPA ID	1	1	0	0	0	1	1	0	0	0	4
TOTAL	326	24	2	31	318	35	11	3	2	564	1,305

Exhibit 23
Total Annual Estimated Respondent Burden by Rule Provision

Provision	Total Hours	Total Hours (Cost Savings)¹	Total Costs	Total Cost Savings	Total Net Costs²
Reading the Rule - Year 1	1,480	0	\$130,288.41	\$0.00	\$130,288.41
EPA Reporting System Registration - Year 1	351	0	\$23,917.64	\$0.00	\$23,917.64
EPA Reporting System Registration - After Year 1	43	0	\$2,914.78	\$0.00	\$2,914.78
Notification - Year 1	755	0	\$51,918.04	\$2,458.99	\$49,459.06
Notification - After Year 1	754	0	\$21,446.90	\$2,458.99	\$18,987.91
Re-notification	2	0	\$164.26	\$0.00	\$164.26
Annual Report	3	0	\$211.46	\$2,097.84	(\$1,886.39)
Provide Acknowledgment of Consent to Transporter	0	12,188	\$0.00	\$450,102.84	(\$450,102.84)
Exception Report	0.17	0	\$11.17	\$10.39	\$0.79
Movement Document	23,721	0	\$1,247,256.39	\$32.24	\$1,247,224.15
Confirmation of Recovery or Disposal	6,192	0	\$250,262.12	\$32.24	\$250,229.88
Exemption for Wastes Destined for Laboratory Analysis	6	1	\$320.26	\$18.03	\$302.24
Obtain EPA IDs (Recognized Traders) - Year 1	2	0	\$149.93	\$0.00	\$149.93
TOTAL - YEAR 1	32,513	12,188	\$1,704,499.69	\$454,752.56	\$1,249,747.12
TOTAL - AFTER YEAR 1	30,279	12,188	\$1,522,587.34	\$454,752.56	\$1,067,834.78
AVERAGE TOTAL IN THE FIRST THREE YEARS	31,024	12,188	\$1,583,224.79	\$454,752.56	\$1,128,472.23

Note:

(1) For the first three years, there are a total of 43,212 burden hours associated with the proposed rule. Of this, 31,024 hours is the incremental cost burden and 12,188 hours is the incremental cost savings of the proposed rule.

(2) Numbers in parentheses indicate a net cost savings.

Exhibit 24
Total Average Annual Respondent Burden and Cost Estimates for the First Three Years

Respondent Type	Total Respondents	Total Responses	Number of Responses per Respondent	Total Hours	Total Labor Costs	Total Capital/Startup and O&M Costs	Total Cost
Private Industry	1,305	7,984	6.1	43,212	\$1,128,472	\$0	\$1,128,472
Agency (Low-end)	N/A	480	N/A	13,622	\$651,878	\$127,417	\$779,296
Agency (High-end)	N/A	480	N/A	14,443	\$697,458	\$211,251	\$908,708