

**SUPPORTING STATEMENT FOR  
EPA INFORMATION COLLECTION REQUEST NUMBER 2513.01  
REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE PROPOSED  
HAZARDOUS WASTE GENERATOR IMPROVEMENTS RULE**

June 2015

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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 “Reporting and Recordkeeping Requirements for the Proposed Hazardous Waste Generator Improvements Rule,” EPA ICR Number 2513.01, OMB Number 2050-NEW.

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

Under the statutory authority of the Resource Conservation and Recovery Act (RCRA), EPA originally promulgated the hazardous waste generator regulatory program in 1980. Since that time, the basic regulatory framework of the program has remained intact except for three major changes. First, pursuant to the Hazardous and Solid Waste Amendments (HSWA) of 1984, the Agency established regulations in 1986 that distinguished between generators generating more than 100 kilograms and less than 1,000 kilograms of hazardous waste in a calendar month (small quantity generators, or SQGs) and generators generating 100 kilograms or less in a calendar month (conditionally exempt small quantity generators, or CESQGs).<sup>1</sup> Prior to the 1986 rule, CESQGs did not exist as a separate generator class, and all facilities generating less than 1,000 kilograms of hazardous waste in a calendar month were subject to the same requirements. Second, and also as a result of HSWA, EPA established Land Disposal Restriction (LDR) regulations. The Agency’s LDR program established treatment standards for hazardous wastes, and specified requirements that generators, transporters, and owners or operators of treatment, storage, and disposal facilities (TSDFs) that manage restricted wastes destined for land disposal must meet. Third, EPA modified the Uniform Hazardous Waste Manifest regulations in 2005 to standardize the content and appearance of the manifest form, make the forms available from a greater number of sources, and adopt new procedures for tracking certain types of hazardous waste shipments.

Over the course of the last 30 years, the Agency has become aware of ambiguities and gaps in the regulations, which, if corrected, could make the program more effective in protecting human health and the environment. For example, the current regulations do not require small and large quantity generators to document situations where they generated a solid waste, as defined at 40 CFR 262.11, that is not a hazardous waste. However, generators often fail to accurately make a hazardous waste determination which can lead to the mismanagement of hazardous waste. In addition, current regulations do not require that hazardous waste container labels include information on the specific hazards of container contents or what risk these wastes could pose to human health and the environment when such waste is being accumulated on-site.

EPA has also become increasingly aware of certain inflexibilities in the generator regulations over the last 30 years. For example, some generators, particularly those located in urban environments, may find it infeasible to meet the requirement that containers holding ignitable or reactive waste be placed at least 15 meters (~50 feet) back from the facility’s property line. In addition, current regulations require that a CESQG or SQG that experiences a one-time generation event resulting in the generation of more than 1,000 kilograms of hazardous waste in a calendar month comply with the regulatory requirements for large quantity generators

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<sup>1</sup> At the time, facilities in this category were referred to as, “Very Small Quantity Generators”.

(LQGs). Requiring CESQGs or SQGs that rarely exceed their normal regulatory status to meet the full LQG requirements as a result of such episodic events may be burdensome.

To address these shortcomings in the current generator regulations, EPA is proposing several specific changes to the hazardous waste generator program. These improvements are relatively minor on an individual basis yet address a wide range of issues. Specifically, EPA proposes to (1) revise different components of the hazardous waste regulatory program; (2) address gaps in the current regulations; (3) provide greater flexibility for hazardous waste generators to manage their hazardous waste in a cost-effective manner; (4) reorganize the hazardous waste generator regulations to improve their usability among regulated facilities; and (5) make technical corrections and conforming changes to address inadvertent errors, remove obsolete programs, and improve the readability of the regulations. In aggregate, the proposed changes to the program are expected to significantly improve regulatory efficiency and provide further protection of human health and the environment.

This ICR is a description of the information collection requirements for all facilities that generate hazardous waste.

## **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 generation and management of hazardous waste. EPA is proposing the establishment of these information collection requirements under the authority of RCRA Subtitle C.

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

EPA and State Agencies will use the collected information to ensure that hazardous wastes are managed in a cost-effective manner that minimizes risks to human health and the environment. Local emergency response organizations will also use the collected information to prepare contingency plans to reduce risks to emergency responders and bystanders.

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

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

None of the information required by the Proposed Rule would duplicate information required by existing RCRA regulations.

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

In compliance with the Paperwork Reduction Act of 1995, EPA 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**

Many of the data and assumptions in this ICR are based on consultations with industry and States. Specifically, EPA consulted state agencies on the ICR's assumptions regarding hazardous waste generation quantities and the number waste streams managed by facilities in the potentially affected universe. The state agencies with whom EPA consulted are identified in Exhibit 1.

#### **Exhibit 1: Organizations Contacted for Information Supporting the Development of this ICR (October-November 2012)**

<b>Organization</b>	<b>Contact</b>
Connecticut Department of Energy and Environmental Protection	Ross Bunnell
Idaho Department of Environmental Quality	Rene Anderson
Maine Department of Environmental Protection	Cherie Plummer
New Jersey Department of Environmental Protection	Mike Hastry
Washington Department of Ecology	Jean Newman

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

EPA has carefully considered the burden imposed upon the regulated community by the Proposed Rule. EPA is confident that those activities required of respondents are necessary, and to the extent possible, the Agency has attempted to minimize the burden imposed. EPA strongly believes that, if the minimum information collection requirements of the Proposed Rule are not met, neither industry nor EPA will be able to ensure that hazardous waste is managed in a manner that is protective of human health and the environment.

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

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, EPA's ICR 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 is 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 following is a list of North American Industrial Classification System (NAICS) codes associated with the facilities most likely to be affected by the information collection requirements covered in this ICR. This table is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely to be impacted by this action.

<b>NAICS</b>	<b>NAICS CATEGORY</b>
115	Support Activities for Agriculture and Forestry
211	Oil and Gas Extraction
236	Construction of Buildings
237	Heavy and Civil Engineering Construction
313	Textile Mills
314	Textile Product Mills
321	Wood Product Manufacturing
322	Paper Manufacturing
323	Printing and Related Support Activities
324	Petroleum and Coal Products Manufacturing
325	Chemical Manufacturing
326	Plastics and Rubber Products Manufacturing
327	Nonmetallic Mineral Product Manufacturing
331	Primary Metal Manufacturing
424	Merchant Wholesalers, Nondurable Goods
483	Water Transportation
484	Truck Transportation
532	Rental and Leasing Services
541	Professional, Scientific, and Technical Services
561	Administrative and Support Services
562	Waste Management and Remediation Services
622	Hospitals
712	Museums, Historical Sites, and Similar Institutions
713	Amusement, Gambling, and Recreation Industries
811	Repair and Maintenance
812	Personal and Laundry Services

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

This section describes information collection requirements applicable to entities that would be affected by the Proposed Rule. While the majority of the requirements are mandatory, three provisions of the rule (intra-organizational transfers, episodic generation, and special requirements for ignitable and reactive waste) are intended to provide greater flexibility to certain classes of hazardous waste generators and are thus voluntary.

### **Negative Hazardous Waste Determinations**

#### (i) Data items:

The Proposed Rule would require that LQGs and SQGs document and maintain records of negative or non-hazardous waste determinations. Under existing regulations, facilities must already determine whether they generate RCRA hazardous waste. Facilities must also document and maintain records when they determine that they have generated a hazardous waste, while no such documentation is required for negative determinations. However, several states already require facilities to document negative determinations.

#### (ii) Respondent activities:

LQGs and SQGs in states that do not already require documentation of negative hazardous waste determinations would have to (1) document non-hazardous waste determinations, and (2) maintain this information in their records for a minimum of three years from the date that the waste was last sent for on-site or off-site treatment, storage, or disposal.

### **Re-notification**

#### (i) Data items:

Under the Proposed Rule, SQGs and LQGs would be required to re-notify EPA of their hazardous waste generation activities every other year. LQGs are already required to re-notify EPA of their hazardous waste generator status through the BR. Twelve states and the District of Columbia also already require SQGs to re-notify. Facilities would be required to review their previous notification and either make changes, if necessary, or confirm that the information remains accurate.

As part of their re-notification, facilities would be required to provide the following information to EPA:

- The name, address, and EPA ID number (if applicable) of the facility;
- The name and telephone number of a contact person;
- The NAICS code of the facility;
- The owner and operator of the facility;
- The generator status of the facility;
- Information on the type of hazardous waste activity; and
- A description of the hazardous wastes handled at the facility.

#### (ii) Respondent activities:

Facilities would be required to complete and re-submit EPA Form 8700-12 by March 1 of each even-numbered year.

### **Labeling/Marking**

#### **(i) Data items:**

Under the Proposed Rule, LQGs and SQGs must label containers with the following information:

- The words “Hazardous Waste”;
- Other words that identify the contents of the containers (e.g., paint solvent waste);
- An indication of the hazards of a container’s contents (e.g., the applicable hazardous waste characteristic).

In addition, under the proposed rule, LQGs and SQGs must mark areas near drip pads and containment buildings with the words “Hazardous Waste” and use their inventory logs to document:

- The date the waste was first placed on the drip pad or in the containment building;
- Other words that identify the contents of the waste (e.g., paint solvent waste);
- An indication of the hazards of the waste (e.g., the applicable hazardous waste characteristic).

#### **(ii) Respondent activities:**

LQGs and SQGs would be required to label containers with the following information: (1) the words “Hazardous Waste”; (2) other words that identify the contents of the containers; and (3) an indication of the hazards of a container’s contents. LQGs and SQGs that accumulate hazardous waste on drip pads or in containment buildings must also mark these areas with the words “Hazardous Waste” and use their inventory logs to document: (1) the date the waste was first placed on the drip pad or in the containment building; (2) other words that identify the contents of the waste; and (3) an indication of the hazards of the waste.

### **Closure**

#### **(i) Data items:**

Under the Proposed Rule, LQGs would be required to notify EPA or an authorized state agency at least 30 days prior to closure and subsequently within 90 days after closure that they have either clean closed, or if they cannot clean close, that they have closed as a landfill. Under existing regulations, LQGs must already comply with general closure provisions (§265.111 and §265.114), which require removing and decontaminating all contaminated equipment, structures, and soil to minimize the need for further maintenance and prevent post-closure release of hazardous waste or constituents into the environment. LQGs storing or treating waste in tanks, drip pads, and containment buildings are also subject to closure requirements specific to these types of units.

(ii) Respondent activities:

Facilities must submit to EPA or an authorized state agency notification at least 30 days prior to closure and subsequent documentation within 90 days after closure that they have either clean closed, or if they cannot clean close, that they have closed as a landfill.

### **Emergency Response Preparedness**

(i) Data items:

Under the existing RCRA requirements for prevention, preparedness, and emergency response, LQGs must prepare a contingency plan and coordinate with their local emergency planning committee or other emergency responders. SQGs must also make arrangements with emergency responders to familiarize themselves with the site. Under the proposed rule, LQGs and SQGs will also be required to maintain records documenting these arrangements with local emergency responders. This documentation must include a certified letter or any other documentation that confirms such arrangements actively exist. Most LQGs and SQGs are likely to have active arrangements with local authorities and will only incur costs to document these arrangements. Currently, EPA estimates that 10 percent of facilities have failed to make arrangements with local emergency authorities. In addition, the proposed rule would require all *new* LQGs to submit an executive summary of their contingency plan to emergency management authorities to improve the ability of emergency response teams to respond to an emergency.

(ii) Respondent activities:

Existing LQGs and SQGs that have active arrangements with their local emergency management authorities would have to document these arrangements. Existing LQGs and SQGs that do not have active arrangements would have to ensure such arrangements exist. If there is no local emergency planning committee in the area or it does not respond or is unwilling to enter an agreement, the generator must enter into an agreement with the local fire department and other emergency responders. All *new* LQGs would have to submit an executive summary of their contingency plan to local emergency management authorities. All *new* SQGs would have to obtain documentation of their active arrangements with emergency responders, but would not be required to develop a separate executive summary of their contingency plan.

### **Transfer Facility Requirements**

(i) Data items:

The proposed rule would change the labeling/marketing requirements for transporters storing hazardous waste at a transfer facility to be consistent with the proposed requirements for generators. While this provision would require transfer facilities to label all hazardous wastes that they receive, the proposed rule's labeling/marketing requirements, as outlined above, would assure that all hazardous wastes that transfer facilities receive from SQGs and LQGs meet these labeling requirements. Thus, transfer facilities would incur additional costs under this provision only for waste received from CESQGs, which are not otherwise required to comply with the

labeling/marking provision of the proposed rule.

(ii) Respondent activities:

Transfer facilities that receive hazardous waste from CESQGs would be required to label containers with the following information: (1) the words “Hazardous Waste”; (2) other words that identify the contents of the containers; and (3) an indication of the hazards of a container’s contents.

**BR Requirements**

(i) Data items:

The proposed rule would make two substantive changes to the BR requirements for LQGs. First, it would require LQGs to report all of the hazardous waste that they generate for the entire reporting year, not just quantities for the month(s) during which they were LQGs. Existing regulation is unclear on this issue and a limited number of states currently require LQGs to report the amount of hazardous waste generated for only those months that they were LQGs. Second, the rule would require LQGs to report all hazardous waste generated during the reporting year, regardless of whether the waste was transported off-site during the reporting year or the following year. Although the current BR instructions state that generators should report the total quantity of hazardous waste generated during the reporting year, Federal regulations do not specifically address cases where a facility generates hazardous waste during the reporting year but ships it off-site during the next calendar year.

(ii) Respondent activities:

LQGs potentially affected by the Propose Rule would be required to submit additional Waste Generation Management (GM) forms along with their BR submission for each waste stream generated, but not currently reported under the existing requirements, including: (1) wastes generated during the month(s) the facility was not an LQG, and (2) wastes generated but not transported off-site during the reporting year.

**Prohibitions on Storage of Restricted Waste**

(i) Data items:

Consistent with the proposed labeling/marking requirements for LQGs and SQGs, the proposed rule would require that containers holding hazardous waste restricted from land disposal be marked with (1) the words “Hazardous Waste”; (2) other words that identify the contents of the containers (e.g., paint solvent waste); and (3) an indication of the hazards of a container’s contents (e.g., the applicable hazardous waste characteristic).

(ii) Respondent activities:

The respondent activities associated with prohibition on storage of restricted waste are

already covered under the Labeling/Marking provision of the proposed rule. Therefore, there are no additional respondent activities.

### **Drip Pad and Containment Building Requirements for SQGs**

#### (i) Data items:

Under the existing regulations, EPA has consistently interpreted the requirements for LQGs that accumulate hazardous waste on drip pads or in containment buildings for 90 days or less without a permit or interim status to also apply to SQGs. Therefore, SQGs that use drip pads or containment buildings must comply with the LQG 90-day accumulation limit (as opposed to the SQG 180-day accumulation limit) as well as the requirements that apply to LQGs for personnel training, development of a full contingency plan, and biennial reporting. Under the proposed rule, EPA believes a more effective and efficient approach is to require SQGs that accumulate hazardous waste on drip pads or in containment buildings to comply with the 90-day accumulation limit, but to otherwise comply with the less stringent requirements for SQGs.

#### (ii) Respondent activities:

There are no additional respondent activities associated with the new requirements. SQGs that accumulate hazardous waste on drip pads or in containment buildings must already comply with the 90-day accumulation limit under the current regulations. Under the proposed rule, SQGs would experience a cost savings associated with no longer being subject to the requirements that apply to LQGs for personnel training, development of a full contingency plan, and biennial reporting.

### **Intra-organizational Transfers**

#### (i) Data items:

To afford greater flexibility to CESQGs, the proposed rule would allow CESQGs to send their hazardous waste to an LQG under the ownership of the same organization, provided that both the CESQG(s) and LQG comply with certain conditions. The CESQG conditions are as follows:

- A participating CESQG must label containers with the words “CESQG Hazardous Waste,” other words that identify the contents of the containers, and an indication of the hazards of a container’s contents (e.g., the applicable hazardous waste characteristic).

The proposed conditions for LQGs receiving hazardous waste from one or more CESQGs under the same organizational structure include the following:

- LQGs must submit a notification to EPA or their authorized state identifying the names, addresses, and contact information for the CESQGs that will be transferring hazardous waste to the LQG;
- LQGs must maintain records of all hazardous waste received from CESQGs that include the name, address, and contact information for each CESQG, as well as a

description (i.e., quantity and hazardous waste codes) of each waste shipment received;

- LQGs mark shipments from CESQGs with the date the hazardous waste was received from the CESQG;
- LQGs would be required to manage all incoming CESQG hazardous waste in compliance with the regulations applicable to their LQG status;
- Hazardous waste received from CESQGs would need to be included in the receiving LQG's BR submissions (which may result in the inclusion of additional GM forms).

(ii) Respondent activities:

CESQGs must perform the following activities:

- Label containers with the relevant required information.

LQGs must perform the following activities:

- Notify EPA or their authorized state of any CESQG that will be transferring waste;
- Maintain records of all hazardous waste received from CESQGs;
- Mark the date the hazardous waste was received from the CESQG;
- Complete and submit GM forms for each CESQG waste stream managed along with the BR submission.

## **Episodic Generation**

(i) Data items:

To provide greater flexibility to CESQGs and SQGs that generate much of their hazardous waste on an episodic basis, the proposed rule would allow a CESQG or an SQG to maintain its existing regulatory status in the event of a planned or unplanned episodic event in which the facility generates a quantity of hazardous waste in a calendar month that would otherwise elevate the facility to a more stringent regulatory status. To take advantage of this provision, an SQG or CESQG may have no more than one episodic event (planned or unplanned) per calendar year and would be subject to the following conditions:

- Notification to EPA or the authorized state at least 30 calendar days prior to initiating a planned episodic event or within 24 hours of an unplanned episodic event;
- CESQGs must obtain a RCRA ID number;
- Facilities must meet the following accumulation standards:
  - o CESQGs must mark containers with the date the episodic event began; label containers "Episodic Hazardous Waste;" manage hazardous waste in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste; ensure that tanks are in good condition and compatible with the hazardous waste stored within; and identify an emergency coordinator for the duration of the event;
  - o SQGs must mark the container or tank log book with the date the episodic event began; label the container or write in the tank log book "Episodic Hazardous Waste"; mark the container or write in the tank log book words that identify the contents and indicate the hazards of the contents; and comply with the applicable accumulation conditions for SQGs;

- Hazardous waste generated from the episodic event must be managed on-site or manifested and shipped off-site to a permitted TSDF;
- Facilities must complete and maintain records that include (1) the beginning and end dates of the event, (2) a description of the event, (3) the types and quantities of hazardous wastes generated at the event, (4) a description of how the hazardous waste was managed, and (5) name(s) of hazardous waste transporters that transported the waste to a permitted TSDF.

(ii) Respondent activities:

CESQGs must perform the following activities:

- Notify EPA or authorized state of an episodic event;
- Complete and submit a 8700-12 form to obtain a RCRA ID number;
- Identify emergency coordinator(s) to EPA or the authorized state;
- Label containers with the relevant required information;
- Complete manifests for hazardous wastes managed off-site;
- Complete and maintain records of all hazardous wastes managed during the episodic event.

SQGs must perform the following activities:

- Notify EPA or their authorized state of an episodic event; and
- Complete and maintain records of all hazardous wastes managed during the episodic event.

### **Special Requirements for Ignitable and Reactive Wastes**

(i) Data items:

Current RCRA regulations require that LQGs must locate containers holding ignitable or reactive waste at least 15 meters from the facility's property line. In urban environments, LQGs may experience difficulty meeting this requirement due to the relatively small footprint of many properties in these areas. To provide flexibility to LQGs, EPA is proposing to allow LQGs to apply for a facility-specific waiver from their local fire department if they are unable to meet the hazardous waste accumulation property line requirement.

(ii) Respondent activities:

Facilities seeking an exemption would be required to submit a waiver to their local fire department.

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

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

#### *Negative Hazardous Waste Determinations*

There are no Agency activities associated with generator waste determinations. EPA may review results of such determinations during site inspections.

### ***Re-notification***

The Agency activities associated with re-notification include reviewing submitted re-notifications and entering this information into a database.

### ***Labeling/Marking***

There are no Agency activities associated with labeling. EPA may review container labeling during site inspections.

### ***Closure***

The Agency activities associated with closure include reviewing and maintaining records of closure notifications. EPA may also conduct site inspections before or after closure.

### ***Emergency Response Preparedness***

There are no Agency activities associated with emergency response preparedness.

### ***Transfer Facility Requirements***

There are no Agency activities associated with transfer facility requirements. EPA may review container labeling during site inspections.

### ***BR Requirements***

There are no Agency activities associated with the clarification of BR requirements.<sup>2</sup>

### ***Prohibitions on Storage of Restricted Waste***

There are no Agency activities associated with prohibitions on storage of restricted waste.

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<sup>2</sup> This ICR assumes the Agency burden to review and maintain electronic records is not dependent on the size of BR submissions (e.g., the number of GM forms).

### ***Drip Pad and Containment Building Requirements for SQGs***

There are no Agency activities associated with requirements for SQGs that accumulate hazardous waste on drip pads or in containment buildings for 90 days or less.

### ***Intra-organizational Transfers***

The Agency activities associated with intra-organizational transfers include reviewing submitted notifications that facilities are voluntarily consolidating waste. LQGs may also have to report additional waste streams in their BR submissions (e.g., fill out additional GM forms); however, this ICR does not estimate the Agency burden for reviewing this information will increase relative to the baseline. EPA may also review container labeling during site inspections.

### ***Episodic Generation***

The Agency activities associated with episodic generation include reviewing facility notifications during episodic events. In addition, for initial episodic events at CESQGs, the Agency would need to review letters requesting an EPA ID number, enter this information into a database, and generate an EPA ID number and send this EPA ID number to the facility.

### ***Special Requirements for Ignitable and Reactive Wastes***

There are no Agency activities associated with special requirements for ignitable and reactive wastes.

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

In collecting and analyzing the information required by the proposed hazardous waste generator improvements rule, the Agency will rely upon hard copy forms, electronic submissions, and applicable database software, where appropriate. The Agency will also be required to maintain a copy of closure notifications.

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

Some respondents will be small organizations. In certain cases, they will be able to complete application, labeling, manifest, recordkeeping, and reporting requirements in less time than large organizations because they carry out fewer of these activities. However, the size of the organization does not always reflect the amount of time needed to submit reports, label containers, or maintain records. EPA believes that the information to be collected is the minimum amount necessary to fulfill the purpose of the proposed rule.

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

The submission of information under this collection is initiated by the respondents.

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

To address uncertainties regarding the number of facilities in the potentially affected universe, the amount of hazardous waste that they generate, and several additional cost-related inputs for this analysis the economic assessment for the Proposed Rule estimates costs as a range. This ICR presents the upper end of this range based on the high-end estimates for these variables.<sup>3</sup>

### 6(a) Estimating Respondent Burden

Exhibit 3 summarizes the respondent burden associated with the new paperwork requirements in the Proposed Rule. As shown in the exhibit, the total one-time respondent burden is approximately 127,800 hours and the total expected annual respondent burden is approximately 261,700 hours. Thus, the average annual number of burden hours during the first three years is estimated to be about 304,300 hours. The expected annual respondent burden consists of three cost components over different time periods: (a) recurring annual costs, (b) recurring annual costs that are incurred only after the first year of the rule, and (c) biennial costs. For reporting purposes, this ICR sums these costs over a 20-year horizon and divides the total by 20 to estimate an average annual cost. This implies that biennial costs are divided by two (since they are incurred every other year) and costs incurred only after the first year of the rule are multiplied by a factor of 0.95 ( $19/20 = 0.95$ ).

### 6(b) Estimating Respondent Costs

Exhibits 4A-C estimate the total costs of the information collection activities associated with the Proposed Rule by requirement and respondent generator status. Where applicable, these cost estimates reflect the cost of labor and capital as well as operations and maintenance (O&M) costs. In sum, the average annual total burden costs during the first three years of the Proposed Rule's implementation is \$16.8 million. Of this \$16.8 million, \$12.8 million is the total burden for labor costs and \$3.9 million is for capital and O&M costs. Exhibits 5A-B estimate the total cost savings for avoided information collection activities related to the Proposed Rule. In the first three years of the Proposed Rule's implementation, the average annual cost savings is approximately \$884,000. Of this \$884,000, \$880,000 represents labor cost savings and \$4,100 is capital and O&M cost savings.

#### Labor Costs

For purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$94.09 for legal staff, \$82.56 for managerial staff, \$39.82 for technical staff, and \$21.04 for clerical staff. These hourly labor costs were obtained from the following sources:

- Hourly Wage: Bureau of Labor Statistics, occupational earnings data for May 2012.<sup>4</sup>

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<sup>3</sup> The low-end and high-end estimates are discussed in greater detail in U.S. EPA, *Assessment of the Potential Costs, Benefits, and Other Impacts of the Improvements to the Hazardous Waste Generator Regulatory Program, as Proposed*, May 2015.

- Fringe Benefit and Overhead Cost Factors: Office of Management and Budget, Circular A-76.<sup>5</sup>

## Capital and Operation & Maintenance Costs

Capital costs generally include any produced physical good necessary to provide the required information, such as machinery, computers, and other equipment. For this ICR, capital costs may include the purchase of software for enhanced labeling systems to carry out the information requirements of the Proposed Rule. LQGs typically purchase this software from third-party vendors or rely on systems developed by waste management firms that handle some of the facility's operations. The cost of developing an enhanced labeling system for a single facility is about 10 hours of a software developer's time (\$65.04/hr) or approximately \$650.41.<sup>6</sup>

O&M costs are those costs associated with materials and services procured for the information collection requirements included in the ICR. For this ICR, O&M costs include the following: (1) hazardous waste labels (\$0.46 per complex label);<sup>7</sup> (2) postage to mail a one-ounce letter by certified mail (\$0.45 for first-class postage + \$2.95 certified-mail fee + \$0.09 for a catalog envelope = \$3.42);<sup>8</sup> (3) photocopying (\$0.11 per page);<sup>9</sup> and (4) mail submission for RCRA Part B permit renewal (\$4.00).<sup>10</sup>

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

The Agency burden hours and costs associate with all the requirements covered in this ICR are reported in Exhibit 5. This ICR uses the 2014 Federal Pay Schedule salary figures to

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<sup>4</sup> Bureau of Labor Statistics, May 2012 National Occupational Employment and Wage Estimates, accessed at [http://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](http://www.bls.gov/oes/current/oes_nat.htm#00-0000) on September 3, 2013.

<sup>5</sup> Loaded wage rate estimated using methodology from Figure C1 of the 29 May 2003 OMB Circular A-76: Performance of Commercial Activities, accessed at [http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html) on September 3, 2013.

<sup>6</sup> Wage information obtained from Bureau of Labor Statistics, May 2012 National Occupational Employment and Wage Estimates, accessed at [http://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](http://www.bls.gov/oes/current/oes_nat.htm#00-0000) on September 3, 2013 adjusted for fringe benefit and overhead cost factors. Burden estimate based on e-mail communication with Tom Baker of Veolia ES Technical Solutions on June 27, 2013.

<sup>7</sup> Average cost of complex labels from JJ Keller and Label Master accessed at <http://www.jjkeller.com/> and <http://www.labelmaster.com/Shop/labels/> on June 26, 2013. The incremental cost for a complex label where a standard label was previously adequate to meet current RCRA requirements is estimated to be \$0.40 (or \$0.46 less \$0.06 for a standard label).

<sup>8</sup> These O&M costs were obtained 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.

<sup>9</sup> Average cost of photocopying based on advertised price by FedEx Office, accessed at <http://www.fedex.com/us/office/> as of June 26, 2013.

<sup>10</sup> Based on Supporting Statement for EPA Information Collection Request 1573.13 "Part B Permit Application, Permit Modifications, and Special Permits," February 2013.

estimate hourly compensation of EPA legal, managerial, technical, and clerical staff.<sup>11</sup> For purposes of this ICR, the following government services levels were assigned:

- Legal Staff: GS-15, Step 5 (\$81.00/hr)
- Managerial Staff: GS-13, Step 5 (\$58.28/hr)
- Technical Staff: GS-11, Step 5 (\$40.89/hr)
- Clerical Staff: GS-06, Step 5 (\$24.86/hr)

The hourly rates above reflect base salary plus standard fringe benefit and overhead factors.<sup>12</sup>

### ***Re-notification***

The burden realized by the Agency for biennial SQG re-notification under the Proposed Rule is approximately 9,040 hours. This ICR estimates that the expected annual cost incurred by the Agency for re-notification is approximately \$370,000 (or \$739,000 in even-numbered years).

### ***Closure***

The Agency burden to review closure notifications submitted by LQGs is 112 hours and a total annual cost of approximately \$5,000.

### ***Intra-organizational Transfers***

The one-time Agency burden to review submitted notifications for intra-organizational transfers is approximately 4,660 hours and a total cost of \$191,000.

### ***Episodic Generation***

The annual Agency burden to review submitted notifications for planned and unplanned episodic events is approximately 890 hours. In addition, the annual burden realized by the Agency to issue EPA ID numbers to CESQGs during an initial episodic event is approximately 1,450 hours. This ICR estimates the total annual cost incurred by the Agency for episodic generation is approximately \$82,000.

## **Estimating State and Local Authority Burden and Costs**

Exhibit 6 presents the burden and costs of the Proposed Rule's paperwork requirements for non-EPA authorities. Local authorities would have to make emergency response arrangements with existing LQGs and SQGs that do not have existing arrangements. Local

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<sup>11</sup> 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 <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/> February 21, 2014.

<sup>12</sup> Loaded wage rate estimated using methodology from Figure C1 of the 29 May 2003 OMB Circular A-76: Performance of Commercial Activities, accessed at [http://www.whitehouse.gov/omb/circulars/a076/a76\\_incl\\_tech\\_correction.html](http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html) on September 3, 2013.

authorities would also have to respond to requests for documentation that active emergency response arrangements exist for all LQGs and SQGs. Furthermore, local authorities would have to review an executive summary of the contingency plans for *new* LQGs developed for emergency response preparedness under the Proposed Rule. Finally, local authorities would have to review waivers pertaining to special requirements for ignitable and reactive waste. According to the National Fire Department Census there are more than 48,800 fire stations in the U.S. and its territories.<sup>13</sup> The number of fire stations that would be affected by the Proposed Rule is uncertain. . Furthermore, the burden associated with the waiver requirement for ignitable and reactive wastes would only impact emergency responders in metropolitan areas. Therefore, the number of fire stations directly affected by the Proposed Rule is likely small relative to the nationwide figure and heavily concentrated in the metropolitan areas of states with a large number of LQGs. This ICR estimates it would require approximately 30 minutes of a supervisor’s time to review emergency response preparedness and waivers pertaining to special requirements for ignitable and reactive waste submitted by hazardous waste generators. It also estimates that it would take about 5 minutes of a supervisor’s time to write an e-mail or letter documenting that active emergency response arrangements exist for LQGs and SQGs.

Wage information for non-EPA authorities was obtained from the Bureau of Labor Statistics as described below:

- First-line Supervisors of Fire Fighting and Prevention Workers (\$50.75/hr)

This hourly rate reflects base salary plus standard fringe benefit and overhead factors as reported by OMB.

As indicated in Exhibit 6, the waiver requirements for ignitable and reactive waste would result in a one-time burden of up to 4,850 hours and a total one-time cost of \$246,000. The waiver requirement for *new* LQGs would result in an expected annual burden of approximately 760 hours and a total cost of \$39,000 (for the low-end scenario the expected annual burden is less than 1 hour). Under the proposed rule, local emergency management authorities would have to make arrangements for emergency response preparedness with existing LQGs and SQGs that do not have active arrangements. This would result in a one-time burden of approximately 3,700 hours and a total one-time cost of \$188,000. Local authorities would also have to respond to requests for documentation of active arrangements with existing LQGs and SQGs, a one-time burden of approximately 5,500 hours and a total one-time cost of \$282,000. Finally, local authorities would have to review the executive summaries of contingency plans submitted by *new* LQGs, resulting in a recurring annual burden of 1,177 hours and a total annual cost of \$60,000.

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

### **Respondent Universe**

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<sup>13</sup> U.S. Department of Homeland Security, Federal Emergency Management Agency, U.S. Fire Administration, National Fire Department Census Database, accessed at <http://apps.usfa.fema.gov/census/> on February 24, 2014.

Exhibit 2 reports the estimated annual universe of facilities subject to each of the provisions of the Proposed Rule covered in this ICR. Thus, the total estimated annual number of respondents is about 96,375.

## **Respondent Burden and Cost**

Based on the universe data presented in Exhibit 2, this section estimates the respondent burden associated with all of the new information collection requirements covered in this ICR. The total respondent burden and cost are reported in Exhibits 4A-C. The additional flexibility under the proposed rule afforded SQGs that accumulate hazardous waste on drip pads or in containment buildings and SQGs and CESQGs that experience episodic events would result in a cost savings for these generators. The total respondent cost savings are reported in Exhibits 5A-B. This section describes the assumptions used in developing the burden estimates.

### ***Negative Hazardous Waste Determinations***

Under the Proposed Rule, 7,010 LQGs and 26,920 SQGs would be required to document non-hazardous waste streams (in addition to those facilities located in states that already require negative determinations). During the first year of the rule, the per facility burden is 4.6 hours for LQGs and 2.1 hours for SQGs, and the total one-time cost per facility is \$158 for LQGs and \$73 for SQGs.<sup>14</sup> After the first year, the per facility burden is 1.4 hours for LQGs and 0.7 hours for SQGs, and the total per facility cost is \$49 for LQGs and \$24 for SQGs. Thus, the expected annual burden is \$46 for LQGs and \$23 for SQGs.

### ***Re-notification***

This ICR estimates that 51,656 SQGs would have to re-notify EPA every even-numbered year and the average facility burden for re-notification is 0.8 hours. Therefore, the expected annual cost per facility is \$18.

### ***Labeling/Marking***

To comply with the enhanced labeling requirements of the Propose Rule, LQGs would need to update their computerized labeling systems, while SQGs would likely use a manual process to label containers with the additional information. For LQGs, the one-time capital cost of software development (for purchase from a third-party vendor or lease from a waste management company) is \$650 per facility.<sup>15</sup> For SQGs, the annual burden is 2.1 hours and a total cost of \$95 per facility.

### ***Closure***

This ICR estimates that 319 LQGs close annually. These facilities are required to submit two closure notifications to EPA (one 30 days prior to closure and one within 90 days following closure), resulting in a burden of 2.0 hours and a total cost of \$90 per facility.

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<sup>14</sup> This ICR estimates that LQG generate an average of 13 non-hazardous waste streams each year, of which, about 4 are new waste streams. In addition, SQGs generate an average of 6 non-hazardous wastes streams per year, of which, about 2 are new waste streams. New waste streams must be documented each year after the first year of the rule.

<sup>15</sup> The cost of developing an enhanced labeling system for a single facility is about 10 hours of a software developer's time (\$65.04/hr).

### ***Emergency Response Preparedness***

Under the Proposed Rule, an existing 1,426 LQGs and 5,970 SQGs that do not have active arrangements with local emergency response authorities would have to make such arrangements, resulting in a one-time burden of approximately 10 minutes and total one-time cost of \$3 per facility. In addition, 14,262 existing LQGs and 59,702 existing SQGs would have to document their active arrangements with emergency responders, resulting in a one-time burden of approximately 6 minutes and a total one-time cost of \$2 per facility. Furthermore, an estimated 2,353 *new* LQGs each year would be required to prepare an executive summary of their contingency plan, resulting in a burden of 4.2 hours and a total cost of \$334 per facility.<sup>16</sup> Finally, an estimated 2,610 *new* SQGs would have to document their arrangements with emergency responders, resulting in a burden of 6 minutes and a total cost of \$2 per facility.

### ***Transfer Facility Requirements***

Transfer facilities would also be required to comply with the labeling/marketing requirements described above. CESQGs are not required to comply with the labeling/marketing provision of the Proposed Rule. Therefore, transfer facilities would have to label containers received from CESQGs to comply with the requirements of the proposed rule. The transfer facility requirements represent a 37.9 hour burden (for labeling waste received from an average of approximately 114 CESQGs per facility) and a total cost of \$1,690 per facility.<sup>17</sup>

### ***BR Requirements***

The BR requirements would affect all 14,262 LQGs in the potentially affected universe as well as less than two dozen SQGs and a similar number of CESQGs located in states that require short-term LQGs to submit information to EPA in even-numbered years.<sup>18,19</sup> The expected annual burden for LQGs is 2.3 hours and a total annual cost of \$60 per facility (or \$120 in even-numbered years).<sup>20</sup> The expected annual burden for SQGs and CESQGs is 5.7 hours and a total annual cost of \$150 per facility (or \$300 in even-numbered years).

### ***Prohibitions on Storage of Restricted Waste***

There is no burden estimated for prohibitions on storage of restricted waste.

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<sup>16</sup> For the low-end estimate, the burden is 2.2 hours and a total cost of \$169 per facility.

<sup>17</sup> For the low-end estimate, the burden is 13.2 hours and a total cost of \$589 per facility.

<sup>18</sup> Currently, Idaho, West Virginia, and South Carolina require short-term LQGs to report the amount of hazardous waste they generate only for the months they are LQGs. U.S. EPA, ASTSWMO Survey Responses, March 2012, provided by Jim O'Leary of EPA's Office of Resource Conservation and Recovery on August 26, 2013.

<sup>19</sup> This ICR estimates that the number of short-term LQGs in the three affected states includes 374 LQGs, 22 SQGs, and 20 CESQGs (the lower generator status categories are included due to episodic generation). If a short-term LQG exceeds the SQG threshold for more than a single calendar month, it would become an LQG.

<sup>20</sup> The estimated burden for short-term LQGs that become LQGs is similar to the reported burden for short-term LQGs that remain SQGs or CESQGs. This ICR conservatively estimates that short-term episodic events last either one or two months in duration, facilities in the latter category become LQGs.

### ***Drip Pad and Containment Building Requirements for SQGs***

There is no burden estimated for SQGs that accumulate hazardous waste on drip pads or in containment buildings for 90 days or less. This ICR estimates that 12 SQGs would realize a cost savings associated with avoiding the LQG requirements for reviewing, updating, and distributing their contingency plan and preparing and submitting biennial reports. The expected annual cost savings for these generators is approximately 8.5 hours and \$550 per facility (or about 12 hours and \$760 per facility in even-numbered years).<sup>21</sup>

### ***Intra-organizational Transfers***

This ICR estimates that 22,411 CESQGs would voluntarily consolidate their waste through intra-organizational transfers and 2,410 LQGs would receive this waste (i.e., approximately 9.3 CESQGs per LQG).<sup>22</sup> For CESQGs, the annual burden for labeling containers is 0.33 hours and a total cost of \$15 per facility. For LQGs, the one-time burden to notify EPA is 9.3 hours and a total cost of approximately \$420 per facility. The annual recordkeeping burden is 0.9 hours and a total cost of approximately \$37 per facility. The BR expected annual reporting burden is 14.1 hours and a total annual cost of \$372 per facility (or \$744 in even-numbered years).

### ***Episodic Generation***

This ICR estimates that approximately 837 SQGs and 1,707 CESQGs would voluntarily take advantage of the episodic generation flexibility provided by the Proposed Rule each year. The estimated burden for SQGs is 7.5 hours and a total cost of \$385 per facility. The estimated burden for CESQGs is 7.2 hours and a total cost of \$339 per facility. This ICR also estimates that 837 SQGs and 527 CESQGs that would avoid becoming an LQG due to an episodic event would realize a cost savings associated with avoiding the LQG requirements for reviewing, updating, and distributing their contingency plan and preparing and submitting biennial reports. The expected annual cost savings for these generators is approximately 10 hours and \$640 per facility (or about 16 hours and \$900 per facility in even-numbered years).<sup>23</sup>

### ***Special Requirements for Ignitable and Reactive Wastes***

LQGs that cannot comply with the property line requirement for the storage of ignitable and reactive wastes may voluntarily apply for a waiver from their local emergency management authority. The number of affected facilities is highly uncertain; therefore, estimates are presented

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<sup>21</sup> The estimated annual cost savings reflects two components: (1) avoided contingency planning requirements (5 hours and \$350 per facility per year) and (2) avoided biennial reporting requirements (7 hours and \$400 per facility in even-numbered years).

<sup>22</sup> The number of affected facilities is based on the number of facilities in states with landfill bans, plus the 10 percent of CESQGs in other states that manage hazardous waste at a TSDF. This 10 percent estimate is based on the professional judgment of Jim O'Leary of EPA's Office of Resource Conservation and Recovery, December 5, 2013, from input provided to EPA by regulated facilities. The percentage of facilities that are part of larger organizations that could take advantage of this provision is based on analysis of facility-level data provided by Florida, Maine, Massachusetts, New Hampshire, Oregon, and Wisconsin.

<sup>23</sup> The estimated annual cost savings reflects two components: (1) avoided contingency planning requirements (5 hours and \$350 per facility per year) and (2) avoided biennial reporting requirements (10.5 hours and \$600 per facility in even-numbered years).

as a range.<sup>24</sup> As a high-end estimate, up to 9,700 LQGs in metropolitan areas would incur a one-time burden of 0.9 hours and a total cost of \$41 per facility. After the first year, up to 1,600 new LQGs would need to apply for permits (an expected annual cost of \$39 per facility). As a low-end estimate, only four LQGs would be affected by this requirement in the first year and about one facility per year after that.

#### **6(e) Bottom Line Burden Hours and Cost Tables**

Exhibit 2 presents the total number of respondents for this collection of information and Exhibit 3A presents the estimated average burden hours and costs per respondent per year for each of the public reporting and recordkeeping requirements associated with the Proposed Rule, which are reported separately for LQGs, SQGs, and CESQGs. Exhibit 3B similarly presents the estimated cost savings per respondent per year. Exhibits 4A-C then provide additional detail on the burden and cost estimates and Exhibits 5A-B provide additional detail on the cost savings estimates. Exhibit 6 presents the Agency burden and Exhibit 7 reports the burden for state and local authorities. Finally, Exhibit 8 summarizes the total average annual costs of the Proposed Rule for the first three years by respondent type. The public reporting and recordkeeping requirements in the exhibits include both one-time and recurring activities (including annual information collection activities and biennial reporting requirements).

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

As described in this ICR, EPA expects that the Proposed Rule will result in an increase in burden to generators of hazardous waste. This increase in burden reflects specific paperwork requirements established by the Proposed Rule (e.g., closure notification) and existing paperwork requirements that will be clarified/modified by the rule for select facilities (e.g., BR reporting, enhanced labeling requirements). EPA has determined that these paperwork requirements are necessary to improve regulatory efficiency and provide further protection of human health and the environment.

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<sup>24</sup> The high-end estimate is based on an analysis of waste codes in EPA's BR database to identify the number of LQGs that manage ignitable or reactive waste and data from the Missouri Census Data Center to match these facility zip codes to U.S. Census metropolitan statistical areas. The low-end estimate is based on the average number of facilities that report a change in their physical address to EPA between BR reporting periods (every two years). This assumes facilities relocate because they cannot comply with the property line requirement.

**Exhibit 2: Estimated Universe of Facilities Affected by the Hazardous Waste Generator Improvements Rule (High-end)**

Information Collection Activity	Number of Respondents			
	LQGs	SQGs	CESQGs	TOTAL
Negative Hazardous Waste Determinations	7,010	26,920	0	33,930
Re-notification	0	51,656	0	51,656
Labeling/Marking	14,262	59,702	0	73,964
Closure	319	0	0	319
Emergency Response Preparedness	14,262	59,702	0	73,964
Transfer Facility Requirements	317	4	4	325
BR Requirements	14,262	22	20	14,304
Prohibitions on Storage of Restricted Waste	0	0	0	0
Drip Pad and Containment Building Requirements	0	12	0	12
Intra-organizational Transfers	2,410	0	22,411	24,821
Episodic Generation	0	837	1,707	2,544
Special Requirements for Ignitable and Reactive Wastes	9,699	0	0	9,699

**Exhibit 3A: Respondent Burden and Cost Estimates for Private Entities by Generator Status (High-end)**

Information Collection Activity	LQGs		SQGs		CESQGs		Total	
	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost	Total Hours	Total Cost
<b>Negative Hazardous Waste Determinations</b>								
One-time cost	31,896	\$1,109,000	56,532	\$1,965,000	0	\$0	88,428	\$3,074,000
Annual cost <sup>1</sup>	9,323	\$324,000	17,902	\$622,000	0	\$0	27,225	\$947,000
<b>Re-notification</b>								
Annual cost <sup>1</sup>	0	\$0	20,306	\$946,000	0	\$0	20,306	\$946,000
<b>Labeling/Marking</b>								
One-time cost	0	\$9,276,000	0	\$0	0	\$0	0	\$9,276,000
Annual cost	0	\$0	126,867	\$5,660,000	0	\$0	126,867	\$5,660,000
<b>Closure</b>								
Annual cost (one-time cost for LQGs)	638	\$29,000	0	\$0	0	\$0	638	\$29,000
<b>Emergency Response Preparedness</b>								
One-time cost	1,654	\$35,000	6,925	\$146,000	0	\$0	8,580	\$180,000
Annual cost (one-time cost for <i>new</i> LQGs and SQGs)	10,024	\$790,000	261	\$5,500	0	\$0	10,285	\$795,000
<b>Transfer Facility Requirements</b>								
Annual cost	12,008	\$536,000	152	\$7,000	152	\$7,000	12,311	\$549,000
<b>Special Requirements for Ignitable and Reactive Waste</b>								
One-time cost for existing LQGs	8,438	\$401,000	0	\$0	0	\$0	8,438	\$401,000
Annual cost (one-time cost for <i>new</i> LQGs) <sup>1</sup>	1,323	\$63,000	0	\$0	0	\$0	1,323	\$63,000
<b>BR Requirements</b>								
Annual cost <sup>1</sup>	17,342	\$911,000	63	\$3,000	57	\$3,000	17,462	\$918,000
<b>Intra-organizational Transfers</b>								
One-time cost	22,389	\$1,011,000	0	\$0	0	\$0	22,389	\$1,011,000
Annual cost <sup>1</sup>	19,280	\$986,000	0	\$0	7,463	\$333,000	26,743	\$1,319,000
<b>Episodic Generation</b>								
Annual cost (one-time cost per facility per episodic event)	0	\$0	6,244	\$322,000	12,303	\$578,000	18,547	\$900,000
<b>TOTAL ONE-TIME COSTS</b>	<b>64,377</b>	<b>\$11,832,000</b>	<b>63,457</b>	<b>\$2,111,000</b>	<b>0</b>	<b>\$0</b>	<b>127,834</b>	<b>\$13,942,000</b>
<b>TOTAL ANNUAL COSTS</b>	<b>69,938</b>	<b>\$3,639,000</b>	<b>171,794</b>	<b>\$7,567,000</b>	<b>19,975</b>	<b>\$921,000</b>	<b>261,707</b>	<b>\$12,126,000</b>
<b>TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS</b>	<b>91,397</b>	<b>\$7,582,000</b>	<b>192,946</b>	<b>\$8,271,000</b>	<b>19,975</b>	<b>\$921,000</b>	<b>304,318</b>	<b>\$16,774,000</b>

Notes:

Numbers may not sum due to rounding.

1. Annual costs include expected values for costs not incurred every year (e.g., biennial reporting).

**Exhibit 3B: Respondent Burden and Cost Savings Estimates for Private Entities by Generator Status (High-end)**

Information Collection Activity	LQGs		SQGs		CESQGs		Total	
	Total Hours	Total Cost Savings	Total Hours	Total Cost Savings	Total Hours	Total Cost Savings	Total Hours	Total Cost Savings
<b>Drip Pad and Containment Building Requirements</b>								
One-time cost savings	0	\$0	0	\$0	0	\$0	0	\$0
Annual cost savings <sup>1</sup>	0	\$0	102	\$6,600	0	\$0	102	\$6,600
<b>Episodic Generation</b>								
One-time cost savings	0	\$0	0	\$0	0	\$0	0	\$0
Annual cost savings <sup>1</sup>	0	\$0	8,567	\$539,000	5,394	\$339,000	13,961	\$878,000
<b>TOTAL ONE-TIME COST SAVINGS</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>
<b>TOTAL ANNUAL COST SAVINGS</b>	<b>0</b>	<b>\$0</b>	<b>8,669</b>	<b>\$545,000</b>	<b>5,394</b>	<b>\$339,000</b>	<b>14,063</b>	<b>\$884,000</b>
<b>TOTAL AVERAGE ANNUAL COST SAVINGS FOR THE FIRST THREE YEARS</b>	<b>0</b>	<b>\$0</b>	<b>8,669</b>	<b>\$545,000</b>	<b>5,394</b>	<b>\$339,000</b>	<b>14,063</b>	<b>\$884,000</b>
<p><u>Notes:</u>                      Numbers may not sum due to rounding.                      1. Annual cost savings include expected values for costs not incurred every year (e.g., biennial reporting).</p>								

**Exhibit 4A: Respondent Burden and Cost Estimates for Large Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
<b>Negative Hazardous Waste Determinations</b>											
Document all nonhazardous waste streams (one-time cost)	0.00	0.00	3.25	1.30	\$0.00	\$1.43	7,010	31,896	\$1,099,000	\$10,000	\$1,109,000
Document new nonhazardous waste streams <sup>1</sup> (annual cost, after first year)	0.00	0.00	1.00	0.40	\$0.00	\$0.44	7,010	9,323	\$321,000	\$3,000	\$324,000
<b>Re-notification</b>											
Notify EPA or Regional Administrator <sup>1</sup> (cost incurred in even-numbered years)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Labeling/Marking</b>											
Software development for enhanced labeling system (one-time cost)	0.00	0.00	0.00	0.00	\$650.41	\$0.00	14,262	0	\$0	\$9,276,000	\$9,276,000
Label all containers in central and satellite accumulation areas	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Closure</b>											
Notify EPA or Regional Administrator	0.00	0.16	1.68	0.16	\$0.00	\$6.84	319	638	\$27,000	\$2,000	\$29,000
<b>Emergency Response Preparedness</b>											
Make arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.16	\$0.00	\$0.00	1,426	228	\$4,800	\$0	\$4,800
Maintain records documenting active arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.10	\$0.00	\$0.00	14,262	1,426	\$30,000	\$0	\$30,000
Develop and submit executive summary of contingency plan to local emergency management authority	0.00	4.00	0.00	0.16	\$0.00	\$0.00	2,353	9,788	\$785,000	\$0	\$785,000
Maintain records documenting active arrangements with local emergency management authorities	0.00	0.00	0.00	0.10	\$0.00	\$0.00	2,353	235	\$5,000	\$0	\$5,000
<b>Transfer Facility Requirements</b>											
Label containers for all waste received from CESQGs	0.00	0.00	37.88	0.00	\$0.00	\$181.83	317	12,008	\$478,000	\$58,000	\$536,000
<b>Special Requirements for Ignitable and Reactive Waste</b>											
Submit waiver application to local emergency management authority (one-time cost)	0.00	0.20	0.57	0.10	\$0.00	\$0.00	9,699	8,438	\$401,000	\$0	\$401,000

**Exhibit 4A: Respondent Burden and Cost Estimates for Large Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
Submit waiver application to local emergency management authority as a new LQG <sup>1</sup>	0.00	0.20	0.57	0.10	\$0.00	\$0.00	1,601	1,323	\$63,000	\$0	\$63,000
<b>BR Requirements</b>											
Gather information and prepare GM forms for waste generated but not transported off-site during reporting year (cost incurred in even-numbered years) <sup>1</sup>	0.00	0.84	1.08	0.36	\$0.00	\$0.00	14,262	16,259	\$855,000	\$0	\$855,000
Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) <sup>1</sup>	0.00	2.03	2.85	0.91	\$0.00	\$0.00	374	1,083	\$56,000	\$0	\$56,000
<b>Intra-organizational Transfers</b>											
Notify EPA or Regional Administrator (one-time cost)	0.00	0.74	7.81	0.74	\$0.00	\$31.80	2,410	22,389	\$934,000	\$77,000	\$1,011,000
Gather information and prepare GM form <sup>1</sup> (cost incurred in even-numbered years)	0.00	5.21	6.70	2.23	\$0.00	\$0.00	2,410	17,039	\$896,000	\$0	\$896,000
Recordkeeping	0.00	0.00	0.93	0.00	\$0.00	\$0.00	2,410	2,241	\$89,000	\$0	\$89,000
Label all containers in central and satellite accumulation areas	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Episodic Generation</b>											
Notify EPA or Regional Administrator	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Obtain an EPA ID Number	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Complete and maintain records of episodic hazardous waste generated	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Complete manifests	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Identify emergency coordinator(s)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>TOTAL ONE-TIME COSTS</b>							<b>N/A</b>	<b>64,377</b>	<b>\$2,469,000</b>	<b>\$9,363,000</b>	<b>\$11,832,000</b>
<b>TOTAL ANNUAL COSTS</b>							<b>N/A</b>	<b>69,938</b>	<b>\$3,576,000</b>	<b>\$63,000</b>	<b>\$3,639,000</b>
<b>Notes:</b>											
Numbers may not sum due to rounding.											
1. Annual costs include expected values for costs not incurred every year (e.g., biennial reporting).											

**Exhibit 4B: Respondent Burden and Cost Estimates for Small Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
<b>Negative Hazardous Waste Determinations</b>											
Document all nonhazardous waste streams (one-time cost)	0.00	0.00	1.50	0.60	\$0.00	\$0.66	26,920	56,532	\$1,948,000	\$18,000	\$1,965,000
Document new nonhazardous waste streams <sup>1</sup> (annual cost, after first year)	0.00	0.00	0.50	0.20	\$0.00	\$0.22	26,920	17,902	\$617,000	\$6,000	\$622,000
<b>Re-notification</b>											
Notify EPA or Regional Administrator <sup>1</sup> (cost incurred in even-numbered years)	0.00	0.08	0.63	0.08	\$0.00	\$3.42	51,656	20,306	\$858,000	\$88,000	\$946,000
<b>Labeling/Marking</b>											
Software development for enhanced labeling system (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Label all containers in central and satellite accumulation areas	0.00	0.00	2.13	0.00	\$0.00	\$10.20	59,702	126,867	\$5,051,000	\$609,000	\$5,660,000
<b>Closure</b>											
Notify EPA or Regional Administrator	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Emergency Response Preparedness</b>											
Make arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.16	\$0.00	\$0.00	5,970	955	\$20,000	\$0	\$20,000
Maintain records documenting active arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.10	\$0.00	\$0.00	59,702	5,970	\$126,000	\$0	\$126,000
Develop and submit executive summary of contingency plan to local emergency management authority	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Maintain records documenting active arrangements with local emergency management authorities	0.00	0.00	0.00	0.10	\$0.00	\$0.00	2,610	261	\$5,500	\$0	\$5,500
<b>Transfer Facility Requirements</b>											
Label containers for all waste received from CESQGs	0.00	0.00	37.88	0.00	\$0.00	\$181.83	4	152	\$6,000	\$1,000	\$7,000
<b>Special Requirements for Ignitable and Reactive Waste</b>											
Submit waiver application to local emergency management authority (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0

**Exhibit 4B: Respondent Burden and Cost Estimates for Small Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
Submit waiver application to local emergency management authority as a new LQG <sup>1</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>BR Requirements</b>											
Gather information and prepare GM forms for waste generated but not transported off-site during reporting year (cost incurred in even-numbered years) <sup>1</sup>	0.00	2.10	2.70	0.90	\$0.00	\$0.00	22	63	\$3,000	\$0	\$3,000
Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) <sup>1</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Intra-organizational Transfers</b>											
Notify EPA or Regional Administrator (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Gather information and prepare GM form <sup>1</sup> (cost incurred in even-numbered years)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Recordkeeping	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Label all containers in central and satellite accumulation areas	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Episodic Generation</b>											
Notify EPA or Regional Administrator	0.00	0.08	0.84	0.08	\$0.00	\$3.42	837	837	\$35,000	\$3,000	\$38,000
Obtain an EPA ID Number	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Complete and maintain records of episodic hazardous waste generated	0.00	2.38	3.06	1.02	\$0.00	\$0.00	837	5,407	\$284,000	\$0	\$284,000
Complete manifests	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Identify emergency coordinator(s)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>TOTAL ONE-TIME COSTS</b>							<b>N/A</b>	<b>63,457</b>	<b>\$2,093,000</b>	<b>\$18,000</b>	<b>\$2,111,000</b>
<b>TOTAL ANNUAL COSTS</b>							<b>N/A</b>	<b>171,794</b>	<b>\$6,860,000</b>	<b>\$707,000</b>	<b>\$7,567,000</b>
<b>Notes:</b>											
Numbers may not sum due to rounding.											
1. Annual costs include expected values for costs not incurred every year (e.g., biennial reporting).											

**Exhibit 4C: Respondent Burden and Cost Estimates for Conditionally Exempt Small Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
<b>Negative Hazardous Waste Determinations</b>											
Document all nonhazardous waste streams (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Document new nonhazardous waste streams <sup>1</sup> (annual cost, after first year)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Re-notification</b>											
Notify EPA or Regional Administrator <sup>1</sup> (cost incurred in even-numbered years)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Labeling/Marking</b>											
Software development for enhanced labeling system (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Label all containers in central and satellite accumulation areas	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Closure</b>											
Notify EPA or Regional Administrator	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Emergency Response Preparedness</b>											
Make arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Maintain records documenting active arrangements with local emergency management authorities (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Develop and submit executive summary of contingency plan to local emergency management authority	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Maintain records documenting active arrangements with local emergency management authorities	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>Transfer Facility Requirements</b>											
Label containers for all waste received from CESQGs	0.00	0.00	37.88	0.00	\$0.00	\$181.83	4	152	\$6,000	\$1,000	\$7,000
<b>Special Requirements for Ignitable and Reactive Waste</b>											
Submit waiver application to local emergency management authority (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0

**Exhibit 4C: Respondent Burden and Cost Estimates for Conditionally Exempt Small Quantity Generators (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Labor Costs	Capital/ Startup and O&M Costs	Total Cost
Submit waiver application to local emergency management authority as a new LQG <sup>1</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
<b>BR Requirements</b>											
Gather information and prepare GM forms for waste generated but not transported off-site during reporting year (cost incurred in even-numbered years) <sup>1</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) <sup>1</sup>	0.00	2.10	2.70	0.90	\$0.00	\$0.00	20	57	\$3,000	\$0	\$3,000
<b>Intra-organizational Transfers</b>											
Notify EPA or Regional Administrator (one-time cost)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Gather information and prepare GM form <sup>1</sup> (cost incurred in even-numbered years)	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Recordkeeping	0.00	0.00	0.00	0.00	\$0.00	\$0.00	0	0	\$0	\$0	\$0
Label all containers in central and satellite accumulation areas	0.00	0.00	0.33	0.00	\$0.00	\$1.60	22,411	7,463	\$297,000	\$36,000	\$333,000
<b>Episodic Generation</b>											
Notify EPA or Regional Administrator	0.00	0.08	0.84	0.08	\$0.00	\$3.42	1,707	1,707	\$71,000	\$6,000	\$77,000
Obtain an EPA ID Number	0.00	0.08	0.84	0.08	\$0.00	\$3.42	1,707	1,707	\$71,000	\$6,000	\$77,000
Complete and maintain records of episodic hazardous waste generated	0.00	1.51	1.94	0.65	\$0.00	\$0.00	1,707	6,992	\$368,000	\$0	\$368,000
Complete manifests	0.00	0.00	0.11	0.24	\$0.00	\$0.00	1,707	600	\$16,000	\$0	\$16,000
Identify emergency coordinator(s)	0.00	0.00	0.40	0.36	\$0.00	\$0.00	1,707	1,297	\$40,000	\$0	\$40,000
<b>TOTAL ONE-TIME COSTS</b>							<b>N/A</b>	<b>0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>TOTAL ANNUAL COSTS</b>							<b>N/A</b>	<b>19,975</b>	<b>\$873,000</b>	<b>\$48,000</b>	<b>\$921,000</b>
<b>Notes:</b>											
Numbers may not sum due to rounding.											
1. Annual costs include expected values for costs not incurred every year (e.g., biennial reporting).											

**Exhibit 5A: Respondent Burden and Cost Savings Estimates for SQGs (High-end)**

Information Collection Activity	Hours and Cost Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost Savings	O&M Cost	Number of Resp.	Total Hours	Labor Cost Savings	Capital/ Startup and O&M Cost Savings	Total Cost Savings
<b>Drip Pad and Containment Building Requirements</b>											
Review, update, and distribute contingency plan	0.00	4.00	0.00	1.00	\$0.00	\$0.00	12	60	\$4,200	\$0	\$4,200
Prepare and submit Biennial Reports (cost avoided in even-numbered years) <sup>1</sup>	0.00	3.10	3.17	0.78	\$0.00	\$5.94	12	42	\$2,400	\$40	\$2,400
<b>Episodic Generation</b>											
Review, update, and distribute contingency plan	0.00	4.00	0.00	1.00	\$0.00	\$0.00	837	4,185	\$294,000	\$0	\$294,000
Prepare and submit Biennial Reports (cost avoided in even-numbered years) <sup>1</sup>	0.00	4.36	4.79	1.32	\$0.00	\$5.94	837	4,382	\$242,000	\$2,500	\$245,000
<b>TOTAL ONE-TIME COST SAVINGS</b>							<b>N/A</b>	<b>0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>TOTAL ANNUAL COST SAVINGS</b>							<b>N/A</b>	<b>8,669</b>	<b>\$543,000</b>	<b>\$2,500</b>	<b>\$545,000</b>
<b>Notes:</b>											
Numbers may not sum due to rounding.											
1. Annual cost savings include expected values for costs not incurred every year (e.g., biennial reporting).											

**Exhibit 5B: Respondent Burden and Cost Savings Estimates for CESQGs (High-end)<sup>1</sup>**

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$94.09/hr	Managerial \$82.56/hr	Technical \$39.82/hr	Clerical \$21.04/hr	Capital/ Startup Cost Savings	O&M Cost	Number of Resp.	Total Hours	Labor Cost Savings	Capital/ Startup and O&M Cost Savings	Total Cost Savings
<b>Episodic Generation</b>											
Review, update, and distribute contingency plan	0.00	4.00	0.00	1.00	\$0.00	\$0.00	527	2,635	\$185,000	\$0	\$185,000
Prepare and submit Biennial Reports (cost avoided in even-numbered years) <sup>1</sup>	0.00	4.36	4.79	1.32	\$0.00	\$5.94	527	2,759	\$152,000	\$1,600	\$154,000
<b>TOTAL ONE-TIME COST SAVINGS</b>							<b>N/A</b>	<b>0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>TOTAL ANNUAL COST SAVINGS</b>							<b>N/A</b>	<b>5,394</b>	<b>\$338,000</b>	<b>\$1,600</b>	<b>\$339,000</b>
<b>Notes:</b>											
Numbers may not sum due to rounding.											
1. Figures in this exhibit reflect cost savings for CESQGs that avoid becoming LQGs during episodic events. There are no avoided reporting requirements for CESQGs that become SQGs.											
2. Annual cost savings include expected values for costs not incurred every year (e.g., biennial reporting).											



**Exhibit 6: Agency Burden and Cost Estimates (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity						Total Hours and Costs		
	Legal \$81.00/hr	Managerial \$58.28/hr	Technical \$40.89/hr	Clerical \$24.86/hr	Capital/ Startup Cost	O&M Cost	Number of Resp.	Total Hours	Total Cost
<b>Re-notification</b>									
Review submitted re-notification and enter this information into a database (cost incurred in even-numbered years) <sup>1, 2</sup>	0.00	0.00	0.35	0.00	\$0.00	\$0.00	51,656	9,040	\$370,000
<b>Closure</b>									
Review and maintain records of closure notification	0.00	0.00	0.35	0.00	\$0.00	\$0.00	319	112	\$5,000
<b>Intra-organizational Transfers</b>									
Review submitted notification (one-time cost)	0.00	0.00	0.35	0.00	\$0.00	\$0.00	13,323	4,663	\$191,000
<b>Episodic Generation</b>									
Review submitted notification of episodic event	0.00	0.00	0.35	0.00	\$0.00	\$0.00	2,544	890	\$36,000
Review letter requesting EPA ID number and enter this information into a database	0.00	0.00	0.35	0.00	\$0.00	\$0.00	1,707	597	\$24,000
Generate EPA ID number and send EPA ID number to facility <sup>3</sup>	0.00	0.00	0.00	0.50	\$0.00	\$0.45	1,707	854	\$22,000
<b>TOTAL ONE-TIME COSTS</b>							<b>N/A</b>	<b>4,663</b>	<b>\$191,000</b>
<b>TOTAL ANNUAL COSTS</b>							<b>N/A</b>	<b>11,493</b>	<b>\$457,000</b>
<b>TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS</b>							<b>N/A</b>	<b>13,047</b>	<b>\$521,000</b>
<b>Notes:</b> Numbers may not sum due to rounding. 1. Estimated Agency burden based on information provided by the following states: Connecticut, Idaho, Illinois, Iowa, Massachusetts, New Hampshire, Ohio, Rhode Island, Vermont. Information provided by Jim O'Leary of EPA's Office of Resource Conservation and Recovery on March 10, 2014. 2. Annual costs include expected values for costs not incurred every year (e.g., biennial reporting). 3. 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.									

**Exhibit 7: Burden and Cost Estimates for State and Local Authorities (High-end)**

Information Collection Activity	Hours and Costs Per Respondent Per Activity			Total Hours and Costs		
	Managerial (\$50.75/hr)	Capital/Startup Cost	O&M Cost	Number of Resp.	Total Hours	Total Cost
<b>Emergency Response Preparedness</b>						
Make arrangements with existing LQGs and SQGs (one-time cost)	0.50	\$0.00	\$0.00	Unknown	3,698	\$188,000
Respond to requests for documentation of active arrangements with existing LQGs and SQGs (one-time cost)	0.083	\$0.00	\$0.00	Unknown	5,547	\$282,000
Review executive summary of contingency plan submitted by <i>new</i> LQGs	0.50	\$0.00	\$0.00	Unknown	1,177	\$60,000
<b>Special Requirements for Ignitable and Reactive Waste</b>						
Review waiver application for current LQGs (one-time cost)	0.50	\$0.00	\$0.00	Unknown	4,850	\$246,000
Review waiver application for new LQGs <sup>1</sup>	0.50	\$0.00	\$0.00	Unknown	760	\$39,000
<b>TOTAL ONE-TIME COSTS</b>				N/A	<b>14,095</b>	<b>\$715,000</b>
<b>TOTAL ANNUAL COSTS</b>				N/A	<b>1,937</b>	<b>\$98,000</b>
<b>TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS</b>				N/A	<b>6,635</b>	<b>\$337,000</b>
<p><u>Notes:</u>                      Numbers may not sum due to rounding.                      1. Annual costs include expected values for costs not incurred every year.</p>						

**Exhibit 8: Total Average Respondent Burden and Cost Estimates for the First Three Years (High-end)**

<b>Respondent Type</b>	<b>Total Respondents</b>	<b>Total Responses</b>	<b>Total Hours</b>	<b>Total Labor Costs</b>	<b>Total Capital/Startup and O&amp;M Costs</b>	<b>Total Cost</b>
Generators (High-end)	96,375	213,915	304,318	\$12,830,000	\$3,944,000	\$16,773,000
State and Local Authorities	48,800	31,762	6,635	\$337,000	\$0	\$337,000
<b>TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS</b>	<b>145,175</b>	<b>245,677</b>	<b>310,953</b>	<b>\$13,166,000</b>	<b>\$3,944,000</b>	<b>\$17,111,000</b>
<p>Notes: Numbers may not sum due to rounding.</p>						

## 6(g) Burden Statement

The average public reporting and recordkeeping burden for this collection of information is about 1 hour. During the first year of the rule, it is estimated to be 11.9 hours for LQGs (4.5 hours on a one-time basis and 7.4 hours annually), 4.3 hours for SQGs (1.1 hours on a one-time basis and 3.2 hours annually), and less than 0.1 hours for CESQGs (no one-time costs).<sup>25</sup> Under the proposed rule, the annual cost savings related to information collection requirements are estimated to be 0.2 hours for SQGs and less than 0.1 hours for CESQGs. 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-2008-0678, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the RCRA Docket is (202) 566-0270. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2008-0678 and OMB Control Number 2050-NEW in any correspondence.

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<sup>25</sup> This burden represents costs incurred by all entities. However, not all entities will be affected by the information collection requirements in this ICR (e.g., not all LQGs will experience a closure event). The average public reporting and recordkeeping burden during the first year of the rule (for only affected facilities, assuming a facility has to comply with each requirement of the Proposed Rule) is 84.5 hours for LQGs (15.0 hours on a one-time basis and 69.6 hours annually), 57.1 hours for SQGs (2.4 hours on a one-time basis and 54.8 hours annually), and 51.1 hours for CESQGs (no one-time costs). Note, this burden reflects costs to 4 SQG and 4 CESQG transfer facilities. Excluding transfer facilities, the average estimated burden is 19.2 hours for SQGs and 13.2 hours for CESQGs.