

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2513.02
REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE FINAL
HAZARDOUS WASTE GENERATOR IMPROVEMENTS RULE**

September 2016

TABLE OF CONTENTS

| | |
|---|-----------|
| 1. IDENTIFICATION OF THE INFORMATION COLLECTION..... | 1 |
| 1(a) Title and Number of the Information Collection..... | 1 |
| 1(b) Short Characterization..... | 1 |
| 2. NEED FOR AND USE OF THE COLLECTION..... | 2 |
| 2(a) Need and Authority for the Collection..... | 2 |
| 2(b) Practical Utility and Users of the Data..... | 2 |
| 3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION | |
| CRITERIA..... | 2 |
| 3(a) Nonduplication..... | 2 |
| 3(b) Public Notice..... | 2 |
| 3(c) Consultations..... | 3 |
| 3(d) Effects of Less Frequent Collection..... | 3 |
| 3(e) General Guidelines..... | 3 |
| 3(f) Confidentiality..... | 3 |
| 3(g) Sensitive Questions..... | 4 |
| 4. THE RESPONDENTS AND THE INFORMATION REQUESTED..... | 4 |
| 4(a) Respondents and NAICS Codes..... | 4 |
| 4(b) Information Requested..... | 5 |
| 5. THE INFORMATION COLLECTED-AGENCY ACTIVITIES, COLLECTION | |
| METHODOLOGY, AND INFORMATION MANAGEMENT..... | 12 |
| 5(a) Agency Activities..... | 12 |
| 5(b) Collection Methodology and Management..... | 13 |
| 5(c) Small Entity Flexibility..... | 13 |
| 5(d) Collection Schedule..... | 13 |
| 6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION..... | 14 |
| 6(a) Estimating Respondent Burden..... | 14 |
| 6(b) Estimating Respondent Costs..... | 14 |
| 6(c) Estimating Agency Burden and Costs..... | 15 |
| 6(d) Estimating the Respondent Universe and Total Burden and Costs..... | 18 |
| 6(e) Bottom Line Burden Hours and Cost Tables..... | 21 |
| 6(f) Reasons for Change in Burden..... | 21 |
| 6(g) Burden Statement..... | 36 |

EXHIBITS

| | | |
|-------------|---|----|
| Exhibit 1: | Total Average Respondent Burden and Cost Estimates for the First Three Years (High-end)..... | 22 |
| Exhibit 2A: | Estimated Universe of Facilities Affected by the Hazardous Waste Generator Improvements Rule (High-end)..... | 23 |
| Exhibit 2B: | Estimated Number of Responses from Facilities Affected by the Hazardous Waste Generator Improvements Rule (High-end)..... | 23 |
| Exhibit 3A: | Respondent Burden and Cost Estimates for Private Entities by Generator Status (High-end)..... | 24 |
| Exhibit 3B: | Respondent Burden and Cost Savings Estimates for Private Entities by Generator Status (High-end)..... | 25 |
| Exhibit 4A: | Respondent Burden and Cost Estimates for Large Quantity Generators (High-end)..... | 26 |
| Exhibit 4B: | Respondent Burden and Cost Estimates for Small Quantity Generators (High-end)..... | 28 |
| Exhibit 4C: | Respondent Burden and Cost Estimates for Very Small Quantity Generators (High-end)..... | 30 |
| Exhibit 4D: | Respondent Burden and Cost Estimates for Recycling Facilities (High-end)..... | 32 |
| Exhibit 5A: | Respondent Burden and Cost Savings Estimates for Small Quantity Generators (High-end)..... | 33 |
| Exhibit 5B: | Respondent Burden and Cost Savings Estimates for Very Small Quantity Generators (High-end)..... | 33 |
| Exhibit 6: | Agency Burden and Cost Estimates (High-end)..... | 34 |
| Exhibit 7: | Burden and Cost Estimates for State and Local Authorities (High-end)..... | 35 |

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 Final Hazardous Waste Generator Improvements Rule,” EPA ICR Number 2513.02, OMB Number 2050-0213.

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 (very small quantity generators, or VSQGs). Prior to the 1986 rule, VSQGs 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 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 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 VSQG or SQG that experiences an episodic 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 (LQGs). Requiring VSQGs 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 implementing 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 is (1) revising different components of the hazardous waste regulatory program; (2) addressing

gaps in the current regulations; (3) providing greater flexibility for hazardous waste generators to manage their hazardous waste in a cost-effective manner; (4) reorganizing the hazardous waste generator regulations to improve their usability among regulated facilities; and (5) making technical corrections and conforming changes to address inadvertent errors, remove obsolete programs, and improve the readability of the regulations. In aggregate, the 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 requiring 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 final rule will duplicate information required by existing RCRA regulations.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA published the Proposed Hazardous Waste Generator Improvements Rule in the *Federal Register* on September 25, 2015 for a 60-day public comment period. EPA received a number of requests to extend the comment period and in response provided a 30-day extension. A notice announcing this extension was published in the *Federal Register* on November 5, 2015. EPA has reviewed public comments received in response to the notice of proposed rulemaking and addressed these comments in publishing the final rule.

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 of waste streams managed by facilities in the potentially affected universe.

The following is a list of organizations contacted for information supporting the development of this ICR.

| Organization | Contact |
|---|-----------------|
| Connecticut Department of Energy and Environmental Protection | Ross Bunnell |
| Idaho Department of Environmental Quality | Rene Anderson |
| Maine Department of Environmental Protection | Cherie Plummer |
| Maryland Department of the Environment | Jennifer Hopper |
| Minnesota Pollution Control Agency | Regina Small |
| New Jersey Department of Environmental Protection | Mike Hastry |
| New York Department of Environmental Conservation | Michael Hill |
| Oregon Department of Environmental Quality | Mary Fritzman |
| 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 final 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 final 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 final 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 final 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.

| NAICS | NAICS CATEGORY |
|--------------|---|
| 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 will be affected by the final 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.

Re-notification

(i) Data items:

Under the final rule, SQGs will be required to re-notify EPA of their hazardous waste generation activities every four years. 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. Additional facilities will 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 will 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 will be required to complete and re-submit EPA Form 8700-12 by March 1 every four years after the promulgation of the final rule.

Labeling/Marking

(i) Data items:

Under the final rule, LQGs and SQGs must label containers and tanks with the following information:

- The words “Hazardous Waste”;
- An indication of the hazards of a container’s contents (e.g., the applicable hazardous waste characteristics).

In addition, under the final rule, LQGs and SQGs must mark areas near containment buildings with the following information:

- The words “Hazardous Waste”;
- An indication of the hazards of the waste.

(ii) Respondent activities:

LQGs and SQGs will be required to label containers and tanks with the following information: (1) the words “Hazardous Waste” and (2) an indication of the hazards of a container’s contents. LQGs and SQGs that accumulate hazardous waste in containment buildings must also mark these areas with (1) the words “Hazardous Waste” and (2) an indication of the associated hazards.

Closure

(i) Data items:

Under the final rule, LQGs will 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. LQGs must also document in their operating record if they close any waste accumulation units prior to the facility closure.

Emergency Response Preparedness

(i) Data items:

Under the existing RCRA requirements for prevention, preparedness, and emergency response, LQGs must prepare a contingency plan, attempt to coordinate with local response agencies, and update the plan as needed. In addition, under the existing requirements SQGs must coordinate with local emergency response authorities. Under the final rule, LQGs and SQGs must maintain records documenting these arrangements with local emergency responders, or if no arrangement exists, that attempts were made to set up this arrangement. 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 responders. In addition, the final rule will require all new LQGs to submit a quick reference guide to their contingency plan to emergency management authorities to improve the ability of emergency response teams to respond to an

emergency. Furthermore, EPA is requiring any LQG that makes a change to its existing contingency plan to prepare and submit a quick reference guide to their contingency plan to emergency responders.

(ii) Respondent activities:

Existing LQGs and SQGs will have to document active arrangements local emergency management authorities, or if no arrangement exists, that attempts were made to set up this arrangement. All new LQGs will have to submit a quick reference guide to their contingency plan to emergency management authorities. Additionally, any LQG that makes a change to its existing contingency plan will also have to submit a quick reference guide to their contingency plan to emergency responders.

Transfer Facility Requirements

(i) Data items:

Transporters that store manifested shipments of hazardous waste in containers at a transfer facility for a period of ten days or less are not subject to the regulation under parts 264, 265, 267, 268, and 270. However, under the final rule EPA is changing the marking and labeling requirements for transporters using a transfer facility when consolidating the contents of two or more containers with the same hazardous waste into a new container, or when combining and consolidating two different hazardous wastes that are compatible with each other. In this case, the transporter must label all containers with (1) the words “Hazardous Waste” and (2) the applicable EPA hazardous waste codes.

While this provision will require transporters to label bulk/mixed wastes, the final rule’s labeling/marketing requirements, as outlined above, will assure that all hazardous wastes that transporters receive from SQGs and LQGs meet these labeling requirements. Thus, transporters will only incur additional costs under this provision for consolidating waste received from VSQGs, which are not otherwise required to comply with the labeling/marketing provision of the final rule. Furthermore, EPA estimates that the vast majority of hazardous waste containers held at transfer facilities for ten days or less are simply held temporarily and then shipped out.

(ii) Respondent activities:

Transporters will be required to label bulk/mixed wastes received from VSQGs that are consolidated at transfer facilities with the following information: (1) the words “Hazardous Waste” and (2) the applicable EPA hazardous waste codes.

BR Requirements

(i) Data items:

The final rule makes a clarifying change to the biennial reporting requirements for LQGs. Specifically, it requires 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. SQGs and VSQGs that become LQGs temporarily will also have 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.

(ii) Respondent activities:

LQGs affected by the final rule will be required to submit additional Waste Generation Management (GM) forms along with their BR submission for each waste stream generated during the month(s) the facility was not an LQG if they are not already required to do so. SQGs and VSQGs that become LQGs temporarily will also have to submit additional GM forms for hazardous waste that they generated during the months they were not LQGs.

BR Requirements for Recycling Facilities

(i) Data items:

Under the existing regulations in CFR 261.6, which identifies the requirements for recyclable materials, certain classes of recycling facilities are exempt from the BR reporting requirements so long as they are not required to be permitted as a TSDF. The final rulemaking adds the BR reporting requirements to CFR 261.6 (c)(2).

(ii) Respondent activities:

Certain classes of non-TSDF recycling facilities that do not store hazardous waste before recycling must submit BR reports to EPA. These facilities will have to read the BR instructions, complete the site ID form, submit the report to EPA or State authorities, and maintain a copy of the report for three years. These facilities will also have to submit a GM form for each waste stream managed.

Prohibitions on Storage of Restricted Waste for TSDFs

(i) Data items:

Consistent with the marking and labeling requirements for SQGs and LQGs, EPA is requiring that TSDFs mark containers holding hazardous waste with (1) the words “Hazardous Waste” and (2) an indication of the hazards of a container’s contents. Under existing regulations, TSDFs must already mark containers holding hazardous waste with a description of the contents of the container.

(ii) Respondent activities:

The respondent activities associated with the prohibitions on storage of restricted waste for TSDFs are already covered under the labeling/marketing provision of the final 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 final rule, EPA believes a more effective and efficient approach is to require SQGs that accumulate hazardous waste in containment buildings to comply with the LQG 90-day accumulation limit (as opposed to the SQG 180-day accumulation limit) and SQGs that accumulate hazardous waste on drip pads to comply with the 180-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 final rule, SQGs will 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 VSQGs, EPA is allowing VSQGs to send their hazardous waste to an LQG under the ownership of the same organization, provided that both the VSQG(s) and LQG comply with certain conditions. The VSQG conditions are as follows:

- A participating VSQG must label containers with the words “VSQG Hazardous Waste” and an indication of the hazards of a container’s contents.
- VSQGs must comply with all Department of Transportation regulations when sending their hazardous waste to an LQG.

The conditions for LQGs receiving hazardous waste from one or more VSQGs 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 VSQGs that will be transferring hazardous waste to the LQG;
- LQGs must maintain records of all hazardous waste received from VSQGs that include the name, address, and contact information for each VSQG, as well as information on the quantity of each waste shipment received;

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

(ii) Respondent activities:

VSQGs 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 VSQG that will be transferring waste;
- Maintain records of all hazardous waste received from VSQGs;
- Mark the date the hazardous waste was received from the VSQG;
- Complete and submit GM forms for each VSQG waste stream managed along with the BR submission.

Episodic Generation

(i) Data items:

To provide greater flexibility to VSQGs and SQGs that generate much of their hazardous waste on an episodic basis, EPA is allowing a VSQG 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 will otherwise elevate the facility to a more stringent regulatory status. To take advantage of this provision an SQG or VSQG and is subject to the following conditions:

- Limit of no more than one planned and one unplanned episodic event per calendar year each lasting no more than 60 days (generators must petition for a second episodic event);
- Notification to EPA or the authorized state at least 30 calendar days prior to initiating a planned episodic event or within 72 hours of an unplanned episodic event;
- VSQGs must obtain a RCRA ID number;
- Facilities must meet the following accumulation standards:
 - o VSQGs 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" 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:

VSQGs must perform the following activities:

- Notify EPA or their 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 will 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 will 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

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.¹

BR Requirements for Recycling Facilities

The Agency activities associated with BR requirements for recycling facilities include reviewing submitted BR reports and entering this information into a database.

Prohibitions on Storage of Restricted Waste for TSDFs

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

Drip Pad and Containment Building Requirements for SQGs

¹ 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).

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 VSQGs, the Agency will 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 final 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 final rule.

5(d) Collection Schedule

The submission of information under this collection is initiated by the respondents. SQG facilities will report information every four years under the re-notification provision. LQGs will have to report biennially for all the waste streams generated under the updated BR Requirements provision. Facilities will report and record information as needed for all additional provisions.

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 regulatory impact analysis for the final rule estimates costs as a range. This ICR presents the upper end of this range based on the high-end estimates for these factors.²

6(a) Estimating Respondent Burden

Exhibit 3A summarizes the respondent burden associated with the new paperwork requirements in the final rule. As shown in the exhibit, the total one-time respondent burden is approximately 56,800 hours and the total annual respondent burden is approximately 233,300 hours. Thus, the average annual number of burden hours during the first three years is estimated to be approximately 252,200 hours. The expected annual respondent burden consists of four 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, (c) recurring biennial reporting costs, and (d) recurring re-notification costs every 4 years. For reporting purposes, this ICR reports the average annual cost over the first three years after the implementation of the final rule. This implies that biennial reporting costs, re-notification costs, and other costs that are not incurred on a regular annual basis are annualized over different time horizons (e.g., two years, four years, or twenty years) using a seven percent discount rate. Exhibit 3B summarizes the respondent cost savings associated with the additional regulatory flexibility provided by the final rule.

6(b) Estimating Respondent Costs

Exhibit 3A also summarizes the total cost of the information collection activities associated with the final rule by respondent generator status. Additional detailed information on the costs of each rule provision by generator status is provided in Exhibits 4A-D. Where applicable, these cost estimates reflect the cost of labor and capital as well as operations and maintenance (O&M) costs. As shown in Exhibit 3A, the average annual total cost burden during the first three years of the final rule is \$13.7 million. Of this \$13.7 million, \$11.2 million is the total burden for labor costs and \$2.5 million is the total burden for capital and O&M costs, as summarized in Exhibits 4A-D.

Exhibit 3B reports the total cost savings for avoided information collection activities related to the final rule. In the first three years of the final rule's implementation, the average annual cost savings is approximately \$643,000. Of this \$643,000, \$638,000 represents labor cost savings and \$6,000 represents capital and O&M cost savings, as shown in Exhibit 5A and 5B.

Labor Costs

For purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$98.11 for legal staff, \$86.15 for managerial

² The low-end and high-end estimates are discussed in greater detail in U.S. EPA, Regulatory Impact Assessment of the Potential Costs, Benefits, and Other Impacts of the Final Hazardous Waste Generator Improvements Rule, April 2016.

staff, \$42.21 for technical staff, and \$22.66 for clerical staff. These hourly labor costs were obtained from the following sources:

- Hourly Wage: Bureau of Labor Statistics, occupational earnings data for May 2014.³
- Fringe Benefit and Overhead Cost Factors: Office of Management and Budget, Circular A-76.⁴

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 final 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 (\$70.04/hr) or approximately \$700.39.⁵

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 primarily include the following: postage to mail a one-ounce letter by certified mail (\$0.49 for first-class postage + \$3.30 certified-mail fee + \$0.03 for a catalog envelope = \$3.82).⁶

The total O&M costs associated with this collection is \$2,526,000.

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 2015 Federal Pay Schedule salary figures to estimate hourly compensation of EPA legal, managerial, technical, and clerical staff.⁷ For purposes of this ICR, the following government services levels were assigned:

³ Bureau of Labor Statistics, May 2014 National Occupational Employment and Wage Estimates, accessed at http://www.bls.gov/oes/current/oes_nat.htm#00-0000 on February 18, 2016, adjusted to \$2015 using the Bureau of Labor Statistics Employment Cost Index for December 2015.

⁴ 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 on September 3, 2013.

⁵ Wage information obtained from Bureau of Labor Statistics, May 2014 National Occupational Employment and Wage Estimates, accessed at http://www.bls.gov/oes/current/oes_nat.htm#00-0000 on February 18, 2016 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.

⁶ These O&M costs were obtained from Supporting Statement for EPA Information Collection Request Number 0976.17, "2015 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification, January 2015.

⁷ U.S. Office of Personnel Management, Salary Table 2015-GS, Incorporating the 1% General Schedule Increase, Effective January 2015, Hourly Basic Rates by Grade and Step, accessed at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/> April 11, 2015.

- Legal Staff: GS-15, Step 5 (\$81.82/hr)
- Managerial Staff: GS-13, Step 5 (\$58.86/hr)
- Technical Staff: GS-11, Step 5 (\$41.30/hr)
- Clerical Staff: GS-06, Step 5 (\$25.11/hr)

The hourly rates above reflect base salary plus standard fringe benefit and overhead factors.⁸

Re-notification

The average annual burden realized by the Agency for SQG re-notification under the final rule is approximately 3,524 hours. This ICR estimates that the expected annual cost incurred by the Agency for re-notification is approximately \$161,000 (or \$582,000 every four years).

Closure

The average annual Agency burden to review closure notifications submitted by LQGs is 116 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 7,900 hours and a total cost of \$328,000.

Episodic Generation

The average annual Agency burden to review submitted notifications for planned and unplanned episodic events is approximately 950 hours. In addition, the annual burden realized by the Agency to issue EPA ID numbers to VSQGs during an initial episodic event is approximately 3,700 hours. This ICR estimates the total annual cost incurred by the Agency for episodic generation is approximately \$177,000.

BR Requirements for Recycling Facilities

The average annual Agency burden to review BR reports submitted by recycling facilities is approximately 2.5 hours and a total cost of \$110.

Estimating State and Local Authority Burden and Costs

Exhibit 6 presents the burden and costs of the final rule's paperwork requirements for non-EPA authorities. Local authorities will have to respond to requests for documentation that active emergency response arrangements exist for all LQGs and SQGs. Furthermore, local

⁸ 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 on September 3, 2013.

authorities will have to review the quick reference guide to contingency plans submitted by new LQGs under the emergency response preparedness requirements of the final rule. Finally, local authorities will 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.⁹ The number of fire stations that will be affected by the final rule is uncertain. Furthermore, the burden associated with the waiver requirement for ignitable and reactive wastes will only impact emergency responders in metropolitan areas. Therefore, the number of fire stations directly affected by the final rule is likely small relative to the nationwide figure and heavily concentrated in the metropolitan areas of states with a large number of LQGs. EPA estimates that a high-end of 14,125 LQGs apply for a waivers pertaining to special requirements for ignitable and reactive waste and a high-end of 1,601 LQGs apply for a waiver each year after the first year of the rule's implementation.¹⁰ Therefore this ICR estimates that of the 48,800 fire stations in the U.S. and its territories, a high-end of 14,125 fire stations will complete a one-time review of waivers pertaining to special requirements for ignitable and reactive waste and 1,601 fire stations will review waivers on an annual basis. This ICR estimates it will 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 will 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 (\$56.84/hr)

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

As indicated in Exhibit 7, the waiver requirements for ignitable and reactive waste will result in a one-time burden of up to 7,060 hours and a total one-time cost of \$401,000. The waiver requirement for new LQGs will result in an expected annual burden of approximately 800 hours and a total cost of \$41,000 (for the low-end scenario the expected annual burden is less than 1 hour). Local authorities will also have to respond to requests for documentation of active emergency response arrangements with existing LQGs and SQGs, a one-time burden of approximately 6,400 hours and a total one-time cost of \$363,000. Finally, local authorities will have to review the quick reference guide submitted by new LQGs and LQGs that update their contingency plan, resulting in a recurring annual burden of 2,890 hours and a total annual cost of \$164,000.

⁹ 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.

¹⁰ See "Regulatory Impact Assessment of the Potential Costs, Benefits, and Other Impacts of the Final Hazardous Waste Generator Improvements Rule." A copy of the analysis is available in the docket for the Final Hazardous Waste Generator Improvements Rule.

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

Respondent Universe

Exhibit 2 reports the estimated annual universe of facilities subject to each of the provisions of the final rule covered in this ICR. The total estimated annual number of respondents is 167,346 (118,546 generators + 48,800 states).

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 final rule afforded SQGs that accumulate hazardous waste on drip pads or in containment buildings and SQGs and VSQGs that experience episodic events will 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.

Re-notification

This ICR estimates that 56,390 SQGs will have to re-notify to EPA every four years and the expected annual facility burden for re-notification is 0.2 hours. The expected annual cost per facility is \$12.

Labeling/Marking

To comply with the enhanced labeling requirements of the Propose Rule, LQGs will need to update their computerized labeling systems or replace their existing labels with DOT labels, while SQGs will 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 \$700 per facility.¹¹ For SQGs, the annual burden is 1.8 hours and a total cost of \$77 per facility.

Closure

This ICR estimates that 464 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 \$96 per facility.

Emergency Response Preparedness

Under the final rule, an existing 2,077 LQGs and 6,431 SQGs that do not have arrangements with local emergency responders will have to document their previous attempt to make arrangements. EPA estimates it takes about 0.5 hours of administrative time for an LQG to

¹¹ 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).

re-submit a contingency plan or an SQG to provide information about their facility to local emergency management authorities or document if they attempted to make arrangements when they have previously been unable to do so. This will result in a one-time burden of 30 minutes and a one-time cost of \$11 per facility. In addition, 20,771 existing LQGs and 64,310 existing SQGs will 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 will be required to submit a quick reference guide to their contingency plan to emergency management authorities, resulting in a burden of 3.6 hours and a total cost of \$111 per facility. In addition, an estimated 3,427 existing LQGs each year that have to update their contingency plan will have to re-submit a quick reference guide to emergency management authorities, resulting in a burden of 3.6 hours and total cost of \$111 per facility. Finally, an estimated 2,610 new SQGs will 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

Transporters using a transfer facility will have to comply with new labeling requirements for waste received from VSQGs when consolidating the contents of two or more containers with the same hazardous waste into a new container or when combining and consolidating two different hazardous wastes that are compatible with each other. The transporter must label all containers of bulk/mixed wastes with (1) the words “Hazardous Waste” and (2) the applicable EPA hazardous waste codes. Each transfer facility is estimate to receive waste from approximately 149 VSQGs per facility (each generating approximately 6 containers of hazardous waste per year). EPA estimates that only 1 percent of these containers will be consolidated. Therefore, the transfer facility requirements represent approximately a 0.75 hour burden and a total cost of \$31 per facility.

BR Requirements

The BR requirements will affect 553 LQGs, 19 SQGs, and 22 VSQGs in states that currently only require short-term LQGs to submit information on the hazardous waste they generate for the month(s) during which they are LQGs.^{12,13} The expected annual burden for LQGs, SQGs, and VSQGs is approximately 4 hours and a total cost of \$120 per facility (or \$230 in even-numbered years).

BR Requirements for Recycling Facilities

The BR requirements for recycling facilities will affect approximately 20 non-TSDF recyclers of hazardous waste that do not store waste prior to recycling. The expected annual burden is 96 hours and a total cost of \$289 per facility (or \$559 in even-numbered years).

¹² 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.

¹³ SQGs and VSQGs are included due to episodic generation. Under existing regulations, if a facility exceeds the SQG threshold for a single calendar month, it will become an LQG.

Prohibitions on Storage of Restricted Waste for TSDFs

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

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 307 SQGs will 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 average annual cost savings for these generators is approximately 6.9 hours and \$320 per facility.¹⁴

Intra-organizational Transfers

This ICR estimates that 31,738 VSQGs will voluntarily consolidate their waste through intra-organizational transfers and 3,537 LQGs will receive this waste (i.e., approximately 9.0 VSQGs per LQG).¹⁵ For VSQGs, the annual burden for labeling containers is 0.5 hours and a total cost of \$21 per facility. For LQGs, the one-time burden to notify EPA is 9.0 hours and a total cost of \$431 per facility. The annual recordkeeping burden is 0.9 hours and a total cost of approximately \$38 per facility. The BR expected annual reporting burden is 10.2 hours and a total annual cost of \$585 per facility (or \$1,130 in even-numbered years).

Episodic Generation

This ICR estimates that approximately 837 SQGs and 1,707 VSQGs will voluntarily take advantage of the episodic generation flexibility provided by the final rule each year. The estimated burden for SQGs is 8.9 hours and a total cost of \$480 per facility. The estimated burden for VSQGs is 9.2 hours and a total cost of \$447 per facility. This ICR also estimates that 837 SQGs and 527 VSQGs that will avoid becoming an LQG due to an episodic event will 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 hours and \$385 per facility (or about 13 hours and \$640 per facility in even-numbered years).¹⁶

Special Requirements for Ignitable and Reactive Wastes

¹⁴ The estimated annual cost savings reflects two components: (1) avoided contingency planning requirements (3.6 hours and \$110 per facility per year) and (2) avoided biennial reporting requirements (6.7 hours and \$400 per facility in even-numbered years).

¹⁵ The number of affected facilities is based on the number of facilities in states with landfill bans, plus the 10 percent of VSQGs 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.

¹⁶ The estimated annual cost savings reflects two components: (1) avoided contingency planning requirements (4 hours and \$111 per facility per year) and (2) avoided biennial reporting requirements (9 hours and \$530 per facility in even-numbered years).

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 as a range.¹⁷ As a high-end estimate, up to 14,125 LQGs in metropolitan and micropolitan areas will incur a one-time burden of 0.9 hours and a total cost of \$44 per facility. After the first year, up to 1,600 new LQGs will need to apply for permits (an expected annual cost of \$40 per facility). As a low-end estimate, only six LQGs will 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 1 summarizes the total average annual costs of the final rule for the first three years by respondent type. Exhibit 2A-B presents the total number of respondents and responses 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 final rule, which are reported separately for LQGs, SQGs, and VSQGs. 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. 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 final rule will result in an increase in burden to generators and recyclers of hazardous waste. The expected increase in burden for generators and recyclers of hazardous waste is a total of 252,194 hours, and the states will total 8,172 annual burden hours under the provisions of the final rule. This increase in burden reflects specific paperwork requirements established by the final 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.

¹⁷ 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 1: Total Average Respondent Burden and Cost Estimates for the First Three Years (High-end)

| Respondent Type | Total Respondents | Total Hours | Total Labor Costs | Total Capital/Startup and O&M Costs | Total Cost |
|--|--------------------------|--------------------|--------------------------|--|---------------------|
| Hazardous Waste Generators and Recycling Facilities (High-end) | 118,546 | 252,194 | \$11,197,000 | \$2,526,000 | \$13,723,000 |
| State and Local Authorities | 48,800 | 8,172 | \$460,000 | \$0 | \$460,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | 167,346 | 260,366 | \$11,657,000 | \$2,526,000 | \$14,184,000 |
| <u>Notes:</u> Numbers may not sum due to rounding. | | | | | |

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

| Information Collection Activity | Number of Respondents | | | | |
|--|-----------------------|---------------|---------------|--------------------|----------------|
| | LQGs | SQGs | VSQGs | Other ² | TOTAL |
| Re-notification | 0 | 56,390 | 0 | 0 | 56,390 |
| Labeling/Marking | 10,288 | 64,310 | 0 | 0 | 74,598 |
| Closure | 464 | 0 | 0 | 0 | 464 |
| Emergency Response Preparedness | 20,771 | 64,310 | 0 | 0 | 85,081 |
| Transfer Facility Requirements | 264 | 0 | 0 | 0 | 264 |
| BR Requirements | 553 | 19 | 22 | 0 | 594 |
| BR Requirements for Recycling Facilities | 0 | 0 | 0 | 20 | 20 |
| Prohibitions on Storage of Restricted Waste | 0 | 0 | 0 | 0 | 0 |
| Drip Pad and Containment Building Requirements | 0 | 307 | 0 | 0 | 307 |
| Intra-organizational Transfers | 3,537 | 0 | 31,738 | 0 | 35,275 |
| Episodic Generation | 0 | 837 | 1,707 | 0 | 2,544 |
| Special Requirements for Ignitable and Reactive Wastes | 14,125 | 0 | 0 | 0 | 14,125 |
| Total¹ | 20,771 | 64,310 | 33,445 | 20 | 118,546 |

Notes:

1. Totals do not sum due to the fact that some the same facilities are subject to the same requirements.
2. Includes non-TSDF recycling facilities that do not store hazardous waste prior to recycling.

Exhibit 2B: Estimated Number of Annual Responses from Facilities Affected by the Hazardous Waste Generator Improvements Rule Excluding One-Time Costs (High-end)

| Information Collection Activity | Number of Responses | | | | |
|--|---------------------|----------------|---------------|--------------------|----------------|
| | LQGs | SQGs | VSQGs | Other ¹ | TOTAL |
| Re-notification | 0 | 56,390 | 0 | 0 | 56,390 |
| Labeling/Marking | 0 | 64,310 | 0 | 0 | 64,310 |
| Closure | 928 | 0 | 0 | 0 | 928 |
| Emergency Response Preparedness | 31,292 | 2,610 | 0 | 0 | 33,902 |
| Transfer Facility Requirements | 264 | 0 | 0 | 0 | 264 |
| BR Requirements | 553 | 19 | 22 | 0 | 594 |
| BR Requirements for Recycling Facilities | 0 | 0 | 0 | 20 | 20 |
| Prohibitions on Storage of Restricted Waste | 0 | 0 | 0 | 0 | 0 |
| Drip Pad and Containment Building Requirements | 0 | 12 | 0 | 0 | 12 |
| Intra-organizational Transfers | 7,074 | 0 | 31,738 | 0 | 38,812 |
| Episodic Generation | 0 | 1,674 | 8,535 | 0 | 10,209 |
| Special Requirements for Ignitable and Reactive Wastes | 1,601 | 0 | 0 | 0 | 1,601 |
| Total | 41,712 | 125,015 | 40,295 | 20 | 207,042 |

Notes:

1. Includes non-TSDF recycling facilities that do not store hazardous waste prior to recycling.

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

| Information Collection Activity | LQGs | | SQGs | | VSQGs | | Recycling Facilities | | Total | |
|--|---------------|--------------------|----------------|--------------------|---------------|--------------------|----------------------|----------------|----------------|---------------------|
| | Total Hours | Total Cost | Total Hours | Total Cost | Total Hours | Total Cost | Total Hours | Total Cost | Total Hours | Total Cost |
| Re-notification | | | | | | | | | | |
| Annual cost ¹ | 0 | \$0 | 12,144 | \$656,000 | 0 | \$0 | 0 | \$0 | 12,144 | \$656,000 |
| Labeling/Marking | | | | | | | | | | |
| One-time cost | 0 | \$7,206,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$7,206,000 |
| Annual cost | 0 | \$0 | 117,902 | \$4,977,000 | 0 | \$0 | 0 | \$0 | 117,902 | \$4,977,000 |
| Closure | | | | | | | | | | |
| Annual cost (one-time cost for LQGs) | 928 | \$45,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 928 | \$45,000 |
| Emergency Response Preparedness | | | | | | | | | | |
| One-time cost | 3,116 | \$71,000 | 9,647 | \$219,000 | 0 | \$0 | 0 | \$0 | 12,762 | \$289,000 |
| Annual cost (one-time cost for LQGs and SQGs) | 20,808 | \$641,000 | 261 | \$6,000 | 0 | \$0 | 0 | \$0 | 21,069 | \$647,000 |
| Transfer Facility Requirements | | | | | | | | | | |
| Annual cost | 196 | \$8,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 196 | \$8,000 |
| BR Requirements | | | | | | | | | | |
| Annual cost ¹ | 1,180 | \$66,000 | 40 | \$2,000 | 46 | \$3,000 | 0 | \$0 | 1,265 | \$71,000 |
| BR Requirements for Recycling Facilities | | | | | | | | | | |
| Annual cost ¹ | 0 | \$0 | 0 | \$0 | 0 | \$0 | 96 | \$5,780 | 96 | \$5,780 |
| Intra-organizational Transfers | | | | | | | | | | |
| One-time cost | 31,738 | \$1,523,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 31,738 | \$1,523,000 |
| Annual cost ¹ | 39,355 | \$2,203,000 | 0 | \$0 | 15,869 | \$670,000 | 0 | \$0 | 55,224 | \$2,873,000 |
| Episodic Generation | | | | | | | | | | |
| Annual cost (one-time cost per facility per episodic event) | 0 | \$0 | 7,458 | \$403,000 | 15,659 | \$763,000 | 0 | \$0 | 23,116 | \$1,166,000 |
| Special Requirements for Ignitable and Reactive Waste | | | | | | | | | | |
| One-time cost for existing LQGs | 12,289 | \$615,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 12,289 | \$615,000 |
| Annual cost (one-time cost for <i>new</i> LQGs) ¹ | 1,323 | \$64,000 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 1,323 | \$64,000 |
| TOTAL ONE-TIME COSTS | 47,142 | \$9,414,000 | 9,647 | \$219,000 | 0 | \$0 | 0 | \$0 | 56,789 | \$9,633,000 |
| TOTAL ANNUAL COSTS | 63,790 | \$3,027,000 | 137,804 | \$6,044,000 | 31,574 | \$1,436,000 | 96 | \$5,780 | 233,264 | \$10,512,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | 79,504 | \$6,165,000 | 141,020 | \$6,117,000 | 31,574 | \$1,436,000 | 96 | \$5,780 | 252,194 | \$13,723,000 |

Notes:

Numbers may not sum due to rounding.

1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden 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 | | VSQGs | | Recycling Facilities | | Total | |
|--|-------------|--------------------|--------------|--------------------|--------------|--------------------|----------------------|--------------------|---------------|--------------------|
| | Total Hours | Total Cost Savings | Total Hours | Total Cost Savings | Total Hours | Total Cost Savings | Total Hours | Total Cost Savings | Total Hours | Total Cost Savings |
| Drip Pad and Containment Building Requirements | | | | | | | | | | |
| One-time cost savings | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| Annual cost savings ¹ | 0 | \$0 | 2,129 | \$98,000 | 0 | \$0 | 0 | \$0 | 2,129 | \$98,000 |
| Episodic Generation | | | | | | | | | | |
| One-time cost savings | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| Annual cost savings ¹ | 0 | \$0 | 7,043 | \$335,000 | 4,435 | \$211,000 | 0 | \$0 | 11,478 | \$545,000 |
| TOTAL ONE-TIME COST SAVINGS | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| TOTAL ANNUAL COST SAVINGS | 0 | \$0 | 9,172 | \$433,000 | 4,435 | \$211,000 | 0 | \$0 | 13,607 | \$643,000 |
| TOTAL AVERAGE ANNUAL COST SAVINGS FOR THE FIRST THREE YEARS | 0 | \$0 | 9,172 | \$433,000 | 4,435 | \$211,000 | 0 | \$0 | 13,607 | \$643,000 |

Notes:

Numbers may not sum due to rounding.

1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting).

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 \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Re-notification | | | | | | | | | | | |
| Notify EPA or Regional Administrator ¹ (cost incurred in even-numbered years) | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Labeling/Marking | | | | | | | | | | | |
| Software development for enhanced labeling system (one-time cost) | 0.00 | 0.00 | 0.00 | 0.00 | \$700.39 | \$0.00 | 10,288 | 0 | \$0 | \$7,206,000 | \$7,206,000 |
| 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 |
| Closure | | | | | | | | | | | |
| Notify EPA or Regional Administrator | 0.00 | 0.16 | 1.68 | 0.16 | \$0.00 | \$7.64 | 464 | 928 | \$41,000 | \$4,000 | \$45,000 |
| Emergency Response Preparedness | | | | | | | | | | | |
| Make arrangement or document attempt to make arrangement with local emergency management authorities (one-time cost) | 0.00 | 0.00 | 0.00 | 0.50 | \$0.00 | \$0.00 | 2,077 | 1,039 | \$24,000 | \$0 | \$24,000 |
| Maintain records of arrangement or attempt to make arrangement with local emergency management authorities (one-time cost) | 0.00 | 0.00 | 0.00 | 0.10 | \$0.00 | \$0.00 | 20,771 | 2,077 | \$47,000 | \$0 | \$47,000 |
| Develop and submit quick reference guide to contingency plan to local emergency management authorities | 0.00 | 0.00 | 1.50 | 2.00 | \$0.00 | \$0.00 | 5,780 | 20,230 | \$628,000 | \$0 | \$628,000 |
| Maintain records of arrangement or attempt to make arrangement with local emergency management authorities | 0.00 | 0.00 | 0.00 | 0.10 | \$0.00 | \$0.00 | 5,780 | 578 | \$13,000 | \$0 | \$13,000 |
| Transfer Facility Requirements | | | | | | | | | | | |
| Label bulk/mixed containers for hazardous waste received from VSQGs | 0.00 | 0.00 | 0.74 | 0.00 | \$0.00 | \$0.00 | 264 | 196 | \$8,000 | \$0 | \$8,000 |
| BR Requirements | | | | | | | | | | | |
| Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) ¹ | 0.00 | 1.47 | 2.13 | 0.67 | \$0.00 | \$0.00 | 553 | 1,180 | \$66,000 | \$0 | \$66,000 |
| Intra-organizational Transfers | | | | | | | | | | | |
| Notify EPA or Regional Administrator (one-time cost) | 0.00 | 0.72 | 7.54 | 0.72 | \$0.00 | \$34.28 | 3,537 | 31,738 | \$1,402,000 | \$121,000 | \$1,523,000 |

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 \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Gather information and prepare GM form ¹ (cost incurred in even-numbered years) | 0.00 | 7.54 | 9.69 | 3.23 | \$0.00 | \$0.00 | 3,537 | 36,181 | \$2,069,000 | \$0 | \$2,069,000 |
| Recordkeeping | 0.00 | 0.00 | 0.90 | 0.00 | \$0.00 | \$0.00 | 3,537 | 3,174 | \$134,000 | \$0 | \$134,000 |
| 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 |
| Episodic Generation | | | | | | | | | | | |
| 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 |
| Special Requirements for Ignitable and Reactive Waste | | | | | | | | | | | |
| Submit waiver application to local emergency management authority (one- time cost) | 0.00 | 0.20 | 0.57 | 0.10 | \$0.00 | \$0.00 | 14,125 | 12,289 | \$615,000 | \$0 | \$615,000 |
| Submit waiver application to local emergency management authority as a new LQG ¹ | 0.00 | 0.20 | 0.57 | 0.10 | \$0.00 | \$0.00 | 1,601 | 1,323 | \$64,000 | \$0 | \$64,000 |
| TOTAL ONE-TIME COSTS | | | | | | | N/A | 47,142 | \$2,088,000 | \$7,327,000 | \$9,414,000 |
| TOTAL ANNUAL COSTS | | | | | | | N/A | 63,790 | \$3,023,000 | \$4,000 | \$3,027,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | | | | N/A | 79,504 | \$3,719,000 | \$2,446,000 | \$6,165,000 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden 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 \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Re-notification | | | | | | | | | | | |
| Notify EPA or Regional Administrator ¹ (cost incurred in even-numbered years) | 0.00 | 0.08 | 0.70 | 0.08 | \$0.00 | \$3.82 | 56,390 | 12,144 | \$596,000 | \$59,000 | \$656,000 |
| Labeling/Marking | | | | | | | | | | | |
| 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 | 1.83 | 0.00 | \$0.00 | \$0.00 | 64,310 | 117,902 | \$4,977,000 | \$0 | \$4,977,000 |
| Closure | | | | | | | | | | | |
| Notify EPA or Regional Administrator | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Emergency Response Preparedness | | | | | | | | | | | |
| Make arrangement or document attempt to make arrangement with local emergency management authorities (one-time cost) | 0.00 | 0.00 | 0.00 | 0.50 | \$0.00 | \$0.00 | 6,431 | 3,216 | \$73,000 | \$0 | \$73,000 |
| Maintain records of arrangement or attempt to make arrangement with local emergency management authorities (one-time cost) | 0.00 | 0.00 | 0.00 | 0.10 | \$0.00 | \$0.00 | 64,310 | 6,431 | \$146,000 | \$0 | \$146,000 |
| Develop and submit quick reference guide to contingency plan to local emergency management authorities | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Maintain records of arrangement or attempt to make arrangement with local emergency management authorities | 0.00 | 0.00 | 0.00 | 0.10 | \$0.00 | \$0.00 | 2,610 | 261 | \$6,000 | \$0 | \$6,000 |
| Transfer Facility Requirements | | | | | | | | | | | |
| Label bulk/mixed containers for hazardous waste received from VSQGs | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| BR Requirements | | | | | | | | | | | |
| Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) ¹ | 0.00 | 1.54 | 1.98 | 0.66 | \$0.00 | \$0.00 | 19 | 40 | \$2,000 | \$0 | \$2,000 |
| Intra-organizational Transfers | | | | | | | | | | | |
| 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 |

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 \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Gather information and prepare GM form ¹ (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 |
| Episodic Generation | | | | | | | | | | | |
| Notify EPA or Regional Administrator | 0.00 | 0.12 | 1.26 | 0.12 | \$0.00 | \$5.73 | 837 | 1,256 | \$55,000 | \$5,000 | \$60,000 |
| 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 | 2.73 | 3.51 | 1.17 | \$0.00 | \$0.00 | 837 | 6,202 | \$343,000 | \$0 | \$343,000 |
| 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 |
| Special Requirements for Ignitable and Reactive Waste | | | | | | | | | | | |
| 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 |
| Submit waiver application to local emergency management authority as a new LQG ¹ | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| TOTAL ONE-TIME COSTS | | | | | | | N/A | 9,647 | \$219,000 | \$0 | \$219,000 |
| TOTAL ANNUAL COSTS | | | | | | | N/A | 137,804 | \$5,980,000 | \$64,000 | \$6,044,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | | | | N/A | 141,020 | \$6,053,000 | \$64,000 | \$6,117,000 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting). | | | | | | | | | | | |

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

| Information Collection Activity | Hours and Costs Per Respondent Per Activity | | | | | | Total Hours and Costs | | | | |
|---|---|--------------------------|-------------------------|------------------------|-----------------------------|-------------|-----------------------|----------------|----------------|---|------------|
| | Legal \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Re-notification | | | | | | | | | | | |
| Notify EPA or Regional Administrator ¹ (cost incurred in even-numbered years) | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Labeling/Marking | | | | | | | | | | | |
| 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 |
| Closure | | | | | | | | | | | |
| Notify EPA or Regional Administrator | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Emergency Response Preparedness | | | | | | | | | | | |
| Make arrangement or document attempt to make arrangement 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 of arrangement or attempt to make arrangement 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 quick reference guide to contingency plan to local emergency management authorities | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Maintain records of arrangement or attempt to make arrangement with local emergency management authorities | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| Transfer Facility Requirements | | | | | | | | | | | |
| Label bulk/mixed containers for hazardous waste received from VSQGs | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| BR Requirements | | | | | | | | | | | |
| Gather information and prepare GM forms for waste generated in months when a facility was not an LQG (cost incurred in even-numbered years) ¹ | 0.00 | 1.54 | 1.98 | 0.66 | \$0.00 | \$0.00 | 22 | 46 | \$3,000 | \$0 | \$3,000 |
| Intra-organizational Transfers | | | | | | | | | | | |
| 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 |

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

| Information Collection Activity | Hours and Costs Per Respondent Per Activity | | | | | | Total Hours and Costs | | | | |
|---|---|--------------------------|-------------------------|------------------------|-----------------------------|-------------|-----------------------|----------------|--------------------|---|--------------------|
| | Legal \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| Gather information and prepare GM form ¹ (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 | 0.50 | 0.00 | \$0.00 | \$0.00 | 31,738 | 15,869 | \$670,000 | \$0 | \$670,000 |
| Episodic Generation | | | | | | | | | | | |
| Notify EPA or Regional Administrator | 0.00 | 0.12 | 1.26 | 0.12 | \$0.00 | \$5.73 | 1,707 | 2,561 | \$113,000 | \$10,000 | \$123,000 |
| Obtain an EPA ID Number | 0.00 | 0.08 | 0.84 | 0.08 | \$0.00 | \$3.82 | 1,707 | 1,707 | \$75,000 | \$7,000 | \$82,000 |
| Complete and maintain records of episodic hazardous waste generated | 0.00 | 1.86 | 2.39 | 0.80 | \$0.00 | \$0.00 | 1,707 | 8,613 | \$476,000 | \$0 | \$476,000 |
| Complete manifests | 0.00 | 0.002 | 0.16 | 0.36 | \$0.00 | \$0.00 | 1,707 | 900 | \$26,000 | \$0 | \$26,000 |
| Identify emergency coordinator(s) | 0.00 | 0.00 | 0.40 | 0.70 | \$0.00 | \$0.00 | 1,707 | 1,878 | \$56,000 | \$0 | \$56,000 |
| Special Requirements for Ignitable and Reactive Waste | | | | | | | | | | | |
| 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 |
| Submit waiver application to local emergency management authority as a new LQG ¹ | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 | 0 | 0 | \$0 | \$0 | \$0 |
| TOTAL ONE-TIME COSTS | | | | | | | N/A | 0 | \$0 | \$0 | \$0 |
| TOTAL ANNUAL COSTS | | | | | | | N/A | 31,574 | \$1,419,000 | \$16,000 | \$1,436,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | | | | N/A | 31,574 | \$1,419,000 | \$16,000 | \$1,436,000 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting). | | | | | | | | | | | |

Exhibit 4D: Respondent Burden and Cost Estimates for Recycling Facilities (High-end)

| Information Collection Activity | Hours and Costs Per Respondent Per Activity | | | | | | Total Hours and Costs | | | | |
|---|---|--------------------------|-------------------------|------------------------|-----------------------------|-------------|-----------------------|----------------|----------------|---|----------------|
| | Legal \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Labor Costs | Capital/ Startup and O&M Costs | Total Cost |
| BR Requirements for Recycling Facilities¹ | | | | | | | | | | | |
| Read the hazardous waste report instructions | 0.00 | 1.08 | 1.68 | 0.00 | \$0.00 | \$0.00 | 20 | 28 | \$1,700 | \$0 | \$1,700 |
| Gather information and prepare Site ID Form | 0.00 | 0.08 | 0.40 | 0.08 | \$0.00 | \$0.00 | 20 | 6 | \$260 | \$0 | \$260 |
| Submit report to the State or Regional EPA Office | 0.00 | 0.82 | 0.32 | 0.20 | \$0.00 | \$6.51 | 20 | 13 | \$920 | \$70 | \$990 |
| Maintain a copy of the Site Identification Form for three years | 0.00 | 0.00 | 0.01 | 0.02 | \$0.00 | \$0.00 | 20 | 0.3 | \$10 | \$0 | \$10 |
| Gather information and prepare GM Forms (cost incurred in even-numbered years) | 0.00 | 1.82 | 2.21 | 0.52 | \$0.00 | \$0.00 | 20 | 46 | \$2,700 | \$0 | \$2,700 |
| Maintain a Copy of Each GM Form for Three Years | 0.00 | 0.00 | 0.13 | 0.26 | \$0.00 | \$0.00 | 20 | 4 | \$120 | \$0 | \$120 |
| TOTAL ONE-TIME COSTS | | | | | | | N/A | 0 | \$0 | \$0 | \$0 |
| TOTAL ANNUAL COSTS | | | | | | | N/A | 96 | \$5,710 | \$70 | \$5,780 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | | | | N/A | 96 | \$5,710 | \$70 | \$5,780 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden 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 \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/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 |
| Drip Pad and Containment Building Requirements | | | | | | | | | | | |
| Review, update, and distribute contingency plan | 0.00 | 0.00 | 1.50 | 2.10 | \$0.00 | \$0.00 | 307 | 1,105 | \$34,000 | \$0 | \$34,000 |
| Prepare and submit Biennial Reports (cost avoided in even-numbered years) ¹ | 0.00 | 2.96 | 2.99 | 0.72 | \$0.00 | \$6.51 | 307 | 1,024 | \$63,000 | \$1,000 | \$64,000 |
| Episodic Generation | | | | | | | | | | | |
| Review, update, and distribute contingency plan | 0.00 | 0.00 | 1.50 | 2.10 | \$0.00 | \$0.00 | 837 | 3,013 | \$93,000 | \$0 | \$93,000 |
| Prepare and submit Biennial Reports (cost avoided in even-numbered years) ¹ | 0.00 | 3.80 | 4.75 | 1.08 | \$0.00 | \$6.51 | 837 | 4,030 | \$239,000 | \$3,000 | \$242,000 |
| TOTAL ANNUAL COST SAVINGS | | | | | | | N/A | 9,172 | \$429,000 | \$4,000 | \$433,000 |
| TOTAL AVERAGE ANNUAL COST SAVINGS FOR THE FIRST THREE YEARS | | | | | | | N/A | 9,172 | \$429,000 | \$4,000 | \$433,000 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting). | | | | | | | | | | | |

Exhibit 5B: Respondent Burden and Cost Savings Estimates for VSQGs (High-end)¹

| Information Collection Activity | Hours and Costs Savings Per Respondent Per Activity | | | | | | Total Hours and Cost Savings | | | | |
|--|---|--------------------------|-------------------------|------------------------|---------------------------------------|-------------|------------------------------|----------------|--------------------------|--|-----------------------|
| | Legal \$98.11/hr | Managerial \$86.15/hr | Technical \$42.21/hr | Clerical \$22.66/hr | Capital/ Startup Cost Saving | O&M Cost | Number of Resp. | Total Hours | Labor Cost Savings | Capital/ Startup and O&M Cost Savings | Total Cost Savings |
| Episodic Generation | | | | | | | | | | | |
| Review, update, and distribute contingency plan | 0.00 | 0.00 | 1.50 | 2.10 | \$0.00 | \$0.00 | 527 | 1,897 | \$58,000 | \$0 | \$58,000 |
| Prepare and submit Biennial Reports (cost avoided in even-numbered years) ² | 0.00 | 3.80 | 4.75 | 1.08 | \$0.00 | \$6.51 | 527 | 2,538 | \$150,000 | \$2,000 | \$152,000 |
| TOTAL ANNUAL COST SAVINGS | | | | | | | N/A | 4,256 | \$209,000 | \$2,000 | \$211,000 |
| TOTAL AVERAGE ANNUAL COST SAVINGS FOR THE FIRST THREE YEARS | | | | | | | N/A | 4,256 | \$209,000 | \$2,000 | \$211,000 |
| Notes: | | | | | | | | | | | |
| Numbers may not sum due to rounding. | | | | | | | | | | | |
| 1. Figures in this exhibit reflect cost savings for VSQGs that avoid becoming LQGs during episodic events. There are no avoided reporting requirements for VSQGs that become SQGs. | | | | | | | | | | | |
| 2. Annual cost savings reflect annualized 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 \$81.82/hr | Managerial \$58.86/hr | Technical \$41.30/hr | Clerical \$25.11/hr | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Total Cost |
| Re-notification | | | | | | | | | |
| Review submitted re-notification (cost incurred in even-numbered years) ^{1, 2} | 0.00 | 0.00 | 0.25 | 0.00 | \$0.00 | \$0.00 | 56,390 | 3,524 | \$161,000 |
| Closure | | | | | | | | | |
| Review and maintain records of closure notification | 0.00 | 0.00 | 0.25 | 0.00 | \$0.00 | \$0.00 | 464 | 116 | \$5,000 |
| Intra-organizational Transfers | | | | | | | | | |
| Review submitted notification (one-time cost) | 0.00 | 0.00 | 0.25 | 0.00 | \$0.00 | \$0.00 | 31,738 | 7,935 | \$328,000 |
| Episodic Generation | | | | | | | | | |
| Review submitted notification of episodic event | 0.00 | 0.00 | 0.38 | 0.00 | \$0.00 | \$0.00 | 2,544 | 954 | \$39,000 |
| Review letter requesting EPA ID number and enter this information into a database ³ | 0.00 | 0.00 | 1.58 | 0.17 | \$0.00 | \$0.00 | 1,707 | 2,987 | \$119,000 |
| Generate EPA ID number and send EPA ID number to facility ³ | 0.00 | 0.00 | 0.02 | 0.40 | \$0.00 | \$0.49 | 1,707 | 717 | \$19,000 |
| BR Requirements for Recycling Facilities | | | | | | | | | |
| Review submitted BR information (cost incurred in even-numbered years) | 0.00 | 0.00 | 0.25 | 0.00 | \$0.00 | \$0.00 | 20 | 2.5 | \$110 |
| TOTAL ONE-TIME COSTS | | | | | | | N/A | 7,935 | \$328,000 |
| TOTAL ANNUAL COSTS | | | | | | | N/A | 8,301 | \$343,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | | | | N/A | 10,946 | \$452,000 |
| <p><u>Notes:</u> Numbers may not sum due to rounding.</p> <ol style="list-style-type: none"> 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 cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting). 3. Supporting Statement for EPA Information Collection Request Number 0976.17, “2015 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” January 22, 2015. | | | | | | | | | |

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 (\$56.84/hr) | Capital/ Startup Cost | O&M Cost | Number of Resp. | Total Hours | Total Cost |
| Emergency Response Preparedness | | | | | | |
| Respond to requests for documentation of active arrangements with existing LQGs and SQGs (one-time cost) | 0.083 | \$0.00 | \$0.00 | 48,800 | 6,381 | \$363,000 |
| Review quick reference guide to contingency plan submitted by new LQGs and LQGs that update their contingency plan | 0.50 | \$0.00 | \$0.00 | 48,800 | 2,890 | \$164,000 |
| Special Requirements for Ignitable and Reactive Waste | | | | | | |
| Review waiver application for current LQGs (one-time cost) | 0.50 | \$0.00 | \$0.00 | 14,125 | 7,063 | \$401,000 |
| Review waiver application for new LQGs ¹ | 0.50 | \$0.00 | \$0.00 | 1,601 | 801 | \$41,000 |
| TOTAL ONE-TIME COSTS | | | | N/A | 13,444 | \$764,000 |
| TOTAL ANNUAL COSTS | | | | N/A | 3,691 | \$206,000 |
| TOTAL AVERAGE ANNUAL COSTS FOR THE FIRST THREE YEARS | | | | N/A | 8,172 | \$460,000 |
| <p>Notes:</p> <p>Numbers may not sum due to rounding.</p> <p>1. Annual cost estimates reflect annualized costs for requirements that do not result in a cost burden every year (e.g., biennial reporting).</p> | | | | | | |

6(g) Burden Statement

The average public reporting and recordkeeping burden for this collection of information is estimated to be about one hour per response annually. The average public reporting and recordkeeping burden for this collection of information during the first year of the rule is estimated to be 3.8 hours for LQGs (2.3 hours on a one-time basis and 3.1 hours annually), 2.2 hours for SQGs (0.2 hours on a one-time basis and 2.1 hours annually), less than 0.1 hours for VSQGs (with no one-time costs), and 4.8 hours for non-TSDF recycling facilities (with no one-time costs).¹⁸ Under the final rule, the annual cost savings related to information collection requirements are estimated to be 0.1 hours for SQGs and less than 0.1 hours for VSQGs. 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, 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. 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.

¹⁸ 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).