Supporting Statement

for

Collection of Information on Anaerobic Digestion Facilities Processing Wasted Food to Support EPA's Sustainable Food Management Program

EPA Information Collection Request Number 2533.01

June 14, 2016

Contents

1. IDEN	TIFICAT	TION OF THE INFORMATION COLLECTION	1
	1(a)	Title of the Information Collection	1
	1(b)	Short Characterization/Abstract	1
2. NEED	FOR A	ND USE OF THIS COLLECTION	3
	2(a)	Need/Authority for the Collection	3
	2(b)	Practical Utility/Users of the Data	3
3. NONI	DUPLIC	ATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA	4
	3(a) Nor	nduplication	4
	3(b)	Public Notice Required Prior to ICR Submission to OMB	5
4. THE 1	RESPON	DENTS AND THE INFORMATION REQUESTED	6
	4(a)	Respondent NAICS Codes	
	4(b)	Information Requested	9
5. THE 1		IATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND	
	INFORM	MATION MANAGEMENT	11
	5(a)	Agency Activities	11
	5(b)	Collection Methodology and Management	11
	5(c)	Small Entity Flexibility	11
	5(d)	Collection Schedule	
6. ESTIN	MATING	THE BURDEN AND COST OF THE COLLECTION	
	6(a)	Estimating Respondent Burden.	12
	6(b)	Estimating Respondent Costs	13
	6(c)	Estimating Agency Burden and Costs	16
	6(d)	Estimating the Respondent Universe	
	6(e)	Bottom Line Burden Hours and Costs	19
	6(f)	Reasons for Change in Burden	19
	6(g)	Burden Statement	19

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

This new information collection is entitled "Collection of Information on Anaerobic Digestion Facilities Processing Wasted Food to support EPA's Sustainable Food Management Program (New)," ICR number 2533.01, OMB control number 2050-NEW.

1(b) Short Characterization/Abstract

EPA's Office of Land and Emergency Management Sustainable Food Management (SFM) program is designed to advance sustainable food management practices throughout the United States by preventing and diverting wasted food from landfills. The focal point of the SFM program is the Food Recovery Challenge in which organizations pledge to improve their sustainable food management practices. The success of the SFM program efforts to divert wasted food from landfills requires sufficient capacity to process the diverted materials which includes composting and anaerobic digestion operations. In addition to increasing opportunity to process wasted food diverted from the municipal solid waste stream, anaerobic digesters achieve social, environmental and economic benefits, such as generation of renewable energy, reduction of methane emissions, and opportunities to improve soil health through the production of soil amendments. The SFM program supports these efforts by educating state and local governments and communities about the benefits of wasted food diversion. The SFM program also builds partnerships with state agencies and other strategic partners interested in developing organics recycling capacity and provides tools to assist organizations in developing anaerobic digestion (AD) projects.

The SFM Program informally tracks data on anaerobic digesters to quantify and monitor

the capacity for processing diverted wasted food in the United States at AD facilities. This AD data consists of information compiled from publicly available sources only. The information requested by this ICR is being formally collected for the first time and would exceed 10 non-Federal respondents. This information collection would allow the SFM program to document the capacity for processing wasted food at AD facilities, track the growth of this capacity and provide a better understanding of the factors affecting this growth. This knowledge will also help develop future activities designed to further increase capacity. Increasing capacity for digestion of wasted food will spur growth in the biogas sector as a whole, advance federal goals to reduce methane emissions, increase production of renewable energy and assist state and local governments with their solid waste diversion goals.

This information collection consists of a data collection request to gather details regarding AD facilities for enhancement of the existing data into an AD facility inventory for the SFM program (SFM AD Facility Inventory). This information collection will include annual updates to the data set. Respondents will be requested to complete an electronic survey for this effort.

A key objective of the SFM program is to support beneficial use of wasted food by decreasing barriers to diversion. Providing information on the location and capacity of AD facilities in the United States to receive wasted food and other organic materials can assist with this issue. In order to ensure that the existing AD data is complete and accurate, the SFM program needs to gather information from all stakeholders involved in the development and management of AD facilities accepting organic wastes. This includes state and local regulatory officials as well as industry representatives. Annual updates to the SFM AD Facility Inventory will be necessary to maintain accuracy over time. This information will allow EPA to estimate and communicate the total capacity and environmental benefits of these projects and enable the

SFM program to strategically plan future activities to support sustainable food management practices. Additionally, stakeholders can use this information to encourage the diversion of wasted food and justify funding resources for AD projects. Respondents for this ICR are: 1) State Liaisons, 2) Industry Representatives, 3) Project Owners/Operators, and 4) Other Stakeholders (e.g. non-profits).

This ICR provides a comprehensive description of information collection efforts to support EPA's SFM program. Sections 1 through 5 describe the information collection with respect to need, use and respondent activities. Section 6 estimates the annual hour and cost burden to respondents and the Agency under this collection.

2. NEED FOR AND USE OF THIS COLLECTION

2(a) Need/Authority for the Collection

Information collected from respondents will allow EPA to track, facilitate and measure the increase in capacity to process wasted food (organics) via anaerobic digestion throughout the United States. The success of the Sustainable Food Management Program's Food Recovery Challenge is dependent on a steady increase of processing capacity over time. At this time, EPA does not have the necessary data to demonstrate this growth or to document the current baseline processing capacity. As the practice of organics diversion gains momentum, the rate at which wasted food is diverted from landfills will rapidly increase. This data is essential for EPA to evaluate agency activities designed to build such capacity and to make adjustments to the overall Sustainable Materials Management (SMM) program, as needed. The importance of this type of data was recently emphasized in EPA's SMM Strategic Plan (Fiscal Year 2017-2022).

2(b) Practical Utility/Users of the Data

3

EPA will use information submitted by respondents to update and expand its inventory of AD facilities. Data on processing capacity and end uses of AD products will be collected as part of the inventory expansion. Data on AD projects will serve as a source of information to inform the public and lawmakers about the environmental benefits, such as renewable energy, derived from anaerobic digesters. The quantitative and qualitative data captured will assist the SFM program with future resource planning. EPA will use information provided by state contacts involved in the review and approval of new or ongoing projects to update the inventory and to identify barriers and opportunities within the AD sector. Information from industry representatives, project owner/operators, and other stakeholders will increase EPA's ability to provide technical assistance to states and municipalities related to project design, implementation, cost effectiveness, return on investment and successful business models.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

For non-federal respondents, the information to be collected has not been collected previously by EPA or any other federal agency from more than 9 respondents. Comprehensive information about existing and new AD projects is not available through any other mechanism. To avoid requesting information that has already been compiled, respondents will receive a spreadsheet, pre-populated with existing AD data. Respondents will be asked to review the information and to provide updates as well as missing or additional information.

The AD community often announces the planning or installation of digester operations, so some of the necessary data are available in publications. The information collection process will allow EPA to collect information from respondents related to the unpublished details of AD projects and projects not covered by existing publications.

3(b) Public Notice Required Prior to ICR Submission to OMB

The 1st Federal Register Notice was posted at 81 FR 10856 on March 2, 2016. Three comments were received during the first 60-day public comment period. Two of the three comments were completely unrelated to the collection of data regarding anaerobic digestion facilities processing food waste. The third comment was supportive of the data collection effort, as long as the response remains voluntary.

3(c) Consultations

SFM staff contacted three respondents to request information on the estimated amount of time required to respond to the SFM AD Facility Inventory electronic survey.

Table 1: List of Respondent Consultations for the SFM AD Facility Inventory Update

Contact Person, Organization	Role	Email Address
Brian Langolf, Director of Biogas	AD Operator	
Systems and Research Development,		langolfb@uwosh.edu
University of Wisconsin – Oshkosh		
Dana Kirk, Assistant professor in	AD Operator	
Biosystems and Agricultural		Kirkdana@anr.msu.edu
Engineering, Michigan State		
University		
Dave Baran, Quasar Energy Group,	AD Vendor/Consultant	dharan@guasarag.com
Project Development		dbaran@quasareg.com

3(d) Effects of Less Frequent Collection

The SFM AD Facility Inventory electronic survey will be distributed to potential respondents <u>annually</u>. Any reduction in the frequency of this information collection would impede efforts to facilitate anaerobic digestion implementation and track the increased diversion of wasted

food and expanded infrastructure capacity in the organics recycling sector.

3(e) General Guidelines

Information collections performed under this clearance will follow all of OMB's General Guidelines regarding federal data collection.

3(f) Confidentiality

Participation in this data collection effort is voluntary. All information received from individual respondents (facilities) will be protected from disclosure in accordance with Freedom of Information Act confidential business exemptions and the Privacy Act of 1974. The collected data will be aggregated prior to release so that data from any one individual facility cannot be ascertained.

3(g) Sensitive Questions

No questions of a sensitive nature are asked as part of this collection effort or included within the pre-populated project data spreadsheet.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondent NAICS Codes

This information collection will encompass a wide variety of respondents. State liaisons include staff from state agencies involved in energy, environment and solid waste management. Industry representatives include engineering firms, construction companies, environmental consultants, and other companies involved in the logistics of developing anaerobic digesters. Other stakeholders include non-profit groups or non-governmental organizations (NGOs), as well as universities that provide information or other support to the project owners or industry

6

representatives. Table 4 provides a summary of the applicable North American Industry

Classification System (NAICS) codes and relevant descriptions for each type of respondent. The

NAICS description is followed by the relevant sector and Standard Occupational Classification

(SOC) code. The SOC code will be used to determine the applicable labor rate for each type of
respondent.

Table 4: Respondents to Information Collection

Respondent Type	NAICS Code	NAICS Description (Sector and SOC code)		
State Liaison	999200	Public Administration; State Managers (Sector 99: Federal, State and Local government; SOC code 11-9041 – Architectural and Engineering Managers)		
	221100	Electric Power Generation, Transmission and Distribution (Sector 22: Utilities; SOC code 17-2081 – Environmental Engineers)		
Industry Representatives	333100	Agriculture, Construction, and Mining Machinery Manufacturing (Sector 33: Manufacturing; SOC code 11-9041 – Architectural and Engineering Managers)		
	541300	Engineering Services (Sector 54: Professional, Scientific, and Technical Services; SOC code 17-2081 – Environmental Engineers)		
	541300	Engineering Services (Sector 54: Professional, Scientific, and Technical Services; SOC code 17-2081 – Environmental Engineers)		
Project Owners or Operators	221300	SOC Code 51-8031: Water and Wastewater Treatment Plant and System Operators		
	611300	Colleges, Universities, and Professional Schools (Sector 61: Educational Services; SOC code 17-2081 – Environmental Engineers)		
()thor		Business, Professional, Labor, Political, and Similar Organizations (Sector 81: Other Services; SOC codes 19-4091 – Environmental Science and Protection Technicians (for Conservation non-profit staff; university researchers)		

Table 5 below provides example respondents under each respondent type, the applicable NAICS codes, and the number of potential respondents for the program covered by this ICR. This table shows the number of potential respondents for each NAICS.

Table 5: Number of Potential Respondents

Respondent Type	NAICS Code	Example Respondent(s)	SFM AD Inventory
State Liaison	999200	State energy or natural resources official	60
Industry Representatives	221100	Electric cooperative engineer; Energy service providers	10
	333100	Manufacturers or distributors of AD systems	20
	541300	Consultants and system developers	25
	541300	AD facility operator	75
Project Owners or	221300	Water and Wastewater Treatment Plant and System Operator	200
Operators	611300	University digester operator	15
Other Stakeholders	813900	Conservation non-profits; University researchers	10
TOTAL (Year 1) ¹	415		
TOTAL (Year 2)	458		
TOTAL (Year 3)	508		
Average Annual Respon	460		

¹ Assuming 10% increase in Respondents per year. To calculate this increase, the number of estimated respondents in each category is multiplied by 1.1 then rounded to the nearest whole number. These estimates are then summed to get 458 and 508 respectively.

4(b) Information Requested

(i) Data Items, Including Recordkeeping Requirements

Information will be collected annually for the SFM AD Facility Inventory. Electronic surveys specific to respondent type will be used to collect information and track updates. As stated above in Section 1(b), collection of information on anaerobic digesters for the SFM AD Facility Inventory is intended to provide information on the capacity for recycling of food-based materials and the growth of this capacity over time. During the first year of data collection, respondents will be requested to respond to an electronic survey designed to obtain the following information on the facilities that are within their purview:

- Project name, type, location, and operational status;
- Feedstock type and volume processed;
- Digester characteristics and capacity, including design specifications; and
- Information on the end-use of by-products produced.

This information is needed to effectively track existing AD projects and their capacity for processing food and other organic wastes and to gain a better understanding of the market for AD by-products. Respondents will also be requested to review a list of existing facilities and identify any additional facilities that they might be aware of or have information about. This information will assist EPA in identifying facilities that are not currently part of the data set. To date, the SFM program has compiled preliminary AD facility data based on publicly available information.

During subsequent year requests, respondents associated with the facilities that are already part of the SFM AD Facility Inventory, will receive a pre-populated electronic spreadsheet with the previous years' data set. These respondents will be requested to review this

data and provide new or revised information where appropriate. The number of respondents is expected to increase by 10% each year. For data collection during years 2 and 3 of this ICR, completion of the electronic survey will only be necessary for respondents associated with newly identified facilities not previously represented in the data set.

Project owners and operators may choose to provide information to EPA more frequently than annually if there are changes to project status, capacity, processing rates etc. However, the SFM program will update information made available to the public on all projects on an annual basis. Participation does not require that any records be kept, although respondents will likely maintain file copies of information submitted to EPA.

(ii) Respondent Activities

Respondents will provide detailed information only on the projects in which they are involved.

For the initial data request respondents will:

- complete the electronic survey (provided by EPA);
- review the list of existing facilities (provided by EPA);
- identify additional facilities, if known; and
- maintain a filed copy of the information submitted electronically (optional).

To provide annual updates to the SFM AD Facility Inventory respondents will:

- review the spreadsheet with the pre-populated data set;
- provide updated information on the projects under the respondents' purview by completing an electronic survey (provided by EPA);
- identify additional facilities, if known; and
- maintain a file copy of the information submitted electronically (optional)

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

5(a) Agency Activities

In requesting and receiving information under this ICR for development and maintenance of the SFM AD Facility Inventory, EPA will complete the following tasks:

- Maintain copy of all submitted data;
- Review information provided and follow up with respondent, if necessary;
- Use information collected to enhance the existing data into the SFM AD Facility
 Inventory (Year 1);
- Enter information into the SFM AD Facility Inventory file (Years 2 and 3); and
- Post facility information on the EPA website (annually)

5(b) Collection Methodology and Management

EPA selected the methods for collecting this information to optimize efficiency and minimize the burden for respondents and EPA. The SFM program will notify respondents by email with a request to complete the electronic survey. Respondents are not required to email completed surveys to EPA. Data will be automatically submitted to EPA upon completion of the electronic survey. All information received from individual respondents (facilities) will be protected from disclosure in accordance with the Freedom of Information Act (5 U.S.C. §552(b)(4)) and the Privacy Act of 1974 (5 U.S.C. §552(a)).

5(c) Small Entity Flexibility

The respondent type identified as "Other Stakeholders" are not classified as small entities due to the non-profit nature of these respondents. Many of the project owner/operators are municipalities or cities. Both municipalities and cities as well as state liaisons are considered

government entities. According to the United States Small Business Administration (SBA), government entities are not permitted to be classified as small businesses for the purposes of this analysis.

Based on the applicable thresholds for the remaining NAICS codes as established by the SBA (see: https://www.sba.gov/content/small-business-size-standards) some industry representatives may be considered small entities. In particular, manufacturers or distributors of AD systems and consultants and system developers could be classified as small entities.

However, the average annual burden and cost per respondent requested under this ICR is estimated to be 30 minutes and \$74, respectively. The response burden does not require any capital investments, only a small amount of labor and EPA ensures that the process for responding to the AD inventory electronic survey and updates is as efficient as possible through automatic data submission at the completion of the survey. This annual burden and cost is not expected to pose a significant burden on small entities. In addition, a response is requested by EPA, but not required and respondents may choose not to respond.

5(d) Collection Schedule

EPA will collect information annually for the SFM AD Facility Inventory through the use of electronic surveys and pre-populated spreadsheets which respondents can review, complete and update.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

In order to obtain accurate hourly burden and cost estimates, EPA consulted with three stakeholders regarding burden and cost assumptions for this ICR. The total hourly burden estimates for the program (for the entire 3-year ICR time period) are summarized in Table 7

below.

Table 7: Total Burden Hours for SFM AD Inventory Updates (3 Year Period)

Respondent Type	NAICS Code	Total Burden (hours) October 2016 – September 2019
State Liaisons	999200	100
	221100	17
Industry Representatives	333100	34
	541300	42
	541300	125
Project Owners or Operators	221300	331
	611300	26
Other Stakeholders	813900	17
TOTAL	692	
Average Annual Burden Hours	231	

The burden hours listed in the table above are based on the following assumption: each annual inventory update for the SFM AD Facility Inventory requires 30 minutes. The burden hour estimates displayed in Table 7 are rounded to the nearest hour. The respondent costs, including wage rate assumptions, are described below. Table 9 presents the estimated total respondent costs during the 3-year ICR period for each type of respondent, using the wage rates outlined in Table 8.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

For each respondent type and NAICS code, EPA used the mean hourly wage for the applicable SOC codes, which are listed in Table 8 below. Labor rates were not divided into clerical, legal, or other labor sub-categories for a specific NAICS code since respondents subject to the information collection effort will be primarily engineers/scientists. Rates were obtained from the Bureau of Labor Statistics' May 2014 National Industry-Specific Occupational

Employment and Wage Estimates (see: http://www.bls.gov/oes/current/oessrci.htm#11). The total labor rate used to calculate cost was obtained by applying an overhead rate of 110 percent.

Table 8: Mean Hourly Wages by Respondent Type and SOC Code

Respondent Type	NAICS Code	SOC code	May 2014 Mean Hourly Wage (\$)	May 2014 Mean Hourly Wage (\$) (+110% overhead)	May 2016 Mean Hourly Wage (\$) (+ 2% annual growth)
State Liaisons	999200	SOC code 11-9041: Architectural and Engineering Managers	45.20	94.92	98.75
	221100	SOC code 17-2081: Environmental Engineers	40.43	84.90	88.33
Industry Representatives	333100	SOC code 11-9041: Architectural and Engineering Managers	64.51	135.47	140.94
	541300	SOC code 17-2081: Environmental Engineers	42.35	88.94	92.53
	541300	SOC code 17-2081: Environmental Engineers	42.35	88.94	92.53
Project Owners or Operators	221300	SOC Code 51-8031: Water and Wastewater Treatment Plant and System Operators	21.25	44.63	46.43
	611300	SOC code 17-2081: Environmental Engineers	37.76	79.30	82.50
Other Stakeholders	813900	SOC code 19-4091: Environmental Science and Protection Technicians (For Conservation Non-profit staff, university researchers	25.26	53.05	55.19

To ensure that the rates accurately reflect the expected rates at the start of this ICR, May 2016 labor rates were estimated by applying an annualized 2% growth factor from the Employment Cost Index to account for increases in wages from May 2014 to May 2016. This is based on the fact that for both private industry and civilian workers, the Employment Cost Index increased by 2.0 percent in 2015 (see: http://www.bls.gov/news.release/eci.t04.htm). Labor costs across the 3-year time period for this ICR are calculated using labor rates that assume an average 2% increase each year using the May 2016 rates as a starting point.

(ii) Estimating Capital and Operations and Maintenance Costs

Because this information collection requires respondents only to report information that is already available to them, there are no capital costs. EPA does not expect that the operations and maintenance (O&M) costs of this program will be significant. The total costs for this information collection are summarized in Table 9 below and are rounded to the nearest dollar. The total cost values are based on the fully loaded rates that include overhead and growth as shown in Table 8 (and then increased by 2% each year during the 3-year time period for this ICR) and the total burden hours in Table 7.

Table 9: Summary of Respondent Burden – Total Cost for SFM AD Inventory (3 Year Period)

Respondent Type	NAICS Code	Total Burden Cost (\$): May 2016 – April 2019
State Liaison	999200	10,024
	221100	1,532
Industry Representatives	333100	4,817
	541300	3,964
	541300	11,799
Project Owners or Operators	221300	15,676
	611300	2,146
Other Stakeholders	813900	957
TOTAL		\$50,915
Average Annual Burden Cost	1	\$16,972

The total cost for the entire 3-year ICR time period is \$50,915. This represents the total overall cost for the respondent portion of this ICR since there are no capital expenditures or O&M costs.

6(c) Estimating Agency Burden and Costs

Following is a summary of the Agency burden associated with each activity, as described in Section 5(a).

- Maintain all submitted data received automatically through electronic surveys
 Clerical: 1 hour per update (updates are annual; 1 hour per year)
- Review the information provided and follow up with respondent if necessary
 Technical: 40 hours per update (updates are annual; 40 hours per year)
- Develop an updated inventory (Year 1)

Technical: 80 hours (Year 1 only)

- Enter data into the SFM AD Facility Inventory file (Years 2 and 3 only)
 Clerical: 8 hours per update (8 hour per year; Years 2 and 3 only)
- Post SFM AD Facility Inventory data on the EPA website
 Technical: 0.25 hours per update (updates are annual; 0.25 hour per year)

Tables 9a and 9b present the estimated total agency burden hours and costs, respectively, for the information collection activities associated with this ICR. The burden hours in Table 9a reflect the entire 3-year time period covered by this ICR. The totals are rounded to the nearest hour. To obtain an hourly burden estimate for the entire ICR time period, annual time estimates for each relevant labor category as described above were multiplied by the appropriate factor depending on whether the activity will be conducted for one, two or all three years. The totals in Table 9b reflect the associated cost by labor category based on the total burden hours presented in Table 9a.

EPA estimates an average hourly cost using set EPA salary rates for labor plus an additional 60% for overhead. To derive these estimates, EPA used the "Salary Table 2016 - GS" from the Department of Personnel Management (see: http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS_h.pdf). For purposes of this ICR, EPA assigned staff the following government service levels: 1) Technical Staff - GS-12, Step 5; and 2) Clerical Staff - GS-5, Step 1. The corresponding salary rates are \$33.72 for technical staff and \$13.54 for clerical staff. When the 60% overhead is included the corresponding rates are \$53.95 for technical staff and \$21.66 for clerical staff. No managerial hours will be spent on implementation of this ICR.

Table 9a: Total Agency Burden Hours

Labor Category	Total Agency Burden (hours): May 2016 – April 2019
Technical (GS-12, step 5)	216
Clerical (GS-5, step 1)	4
TOTAL	220
Average Annual Burden Hours	73

Table 9b: Total Agency Cost

Labor Category	Total Agency Cost (\$): May 2016 – April 2019	Total Agency Cost +60% Overhead (\$): May 2016 – April 2019
Technical (GS-12, step 5)	7,284	11,654
Clerical (GS-5, step 1)	54	87
TOTAL (\$)	7,338	11,741
Average Annual Costs	2,446	3,914

Table 9b presents the total cost to the Agency as described in Section 5(a). The total agency burden for the relevant ICR time period is 220 hours and the total cost is \$11,741.

6(d) Estimating the Respondent Universe

The number of respondents for each year of this ICR is expected to gradually increase over time. It is anticipated that the entire number of facilities will increase by approximately 10% per year over the three years of the ICR. Tables 10a and 10b present a summary of the

respondent universe by category for the next 3-year ICR period for total hours and total costs, respectively. The burden estimates are based on the total respondent universe.

Table 10a: Total Hours (3 Year Period)

	Total Hours: May 2016 – April 2019
AGENCY BURDEN	220
RESPONDENT BURDEN	691
TOTAL BURDEN	911
ANNUAL BURDEN	304

Table 10b: Total Costs (3 Year Period)

	Total Cost (\$): May 2016 – April 2019
AGENCY COST	11,740
RESPONDENT COST	52,038
O&M/Capital Costs	0
TOTAL COST (\$)	63,778
ANNUAL COST (\$)	21,259

6(e) Bottom Line Burden Hours and Costs

Over the 3-year period covered by this ICR, EPA estimates the total respondent burden to be 691 hours and \$50,915. There are no O&M or capital costs. EPA estimates the total Agency burden to be 220 hours and \$11,741. The annual respondent burden and cost, averaged over the three-year period, is 231 hours and \$16,972, respectively. There are no O&M or capital costs. The annual Agency burden and cost, averaged over the three-year period, is 73 hours and \$3,914. The total estimated burden and cost is 304 hours and \$20,886 per year.

6(f) Reasons for Change in Burden

The change in burden is not applicable in this case since this is a new ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 30 minutes per response.

Burden means the total time, effort or financial resources expended by persons to generate, maintain, retain and 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 EPA-HQ RCRA-2015-0836, which is available for online viewing at www.regulations.gov, or in person viewing at the Resource Conservation and Recovery Act Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave. NW, Washington, DC. The EPA/DC 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 Resource Conservation and Recovery Act Docket is 202-566-0270.

An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2015-0836 and OMB Control Number 2050-NEW in any correspondence.