

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2513.03
REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE FINAL
HAZARDOUS WASTE GENERATOR IMPROVEMENTS RULE**

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This information Collection Request (ICR) is entitled “Reporting And Recordkeeping Requirements for the Final Hazardous Waste Generator Improvements Rule,” EPA ICR Number 2513.03, OMB Number 2050-0213.

1(b) Short Characterization

In the Resource Conservation and Recovery Act of 1976 (RCRA), as amended, Congress authorized the U.S. Environmental Protection Agency (EPA) to develop and administer a national hazardous waste program. The core of the program is the regulation of hazardous waste from generation to eventual disposal, i.e., from “cradle to grave.” Sections 3001(d) and 3002 of RCRA authorize EPA to develop and promulgate regulations for generators of hazardous waste. Among other things, EPA is authorized to establish generator standards for recordkeeping, labeling, storage of wastes in tanks, containers, drip pads and containment buildings, use of a hazardous waste manifest system, and biennial reporting to EPA. In addition, RCRA section 3010 sets forth requirements for generators and other hazardous waste handlers to notify EPA of their hazardous waste activities. Finally, RCRA section 3017 sets forth requirements for exporters exporting hazardous waste from the United States (e.g., notification and annual reporting requirements). In 1980, EPA promulgated the principal elements of the generator requirements in 40 CFR part 262. These regulations have been amended on several occasions, including most recently with the 2016 Hazardous Waste Generator Improvements Rule.

Under current RCRA regulations, aerosol cans are categorized as hazardous waste and must be managed by a permitted RCRA hazardous waste treatment, storage, and disposal facility (TSDF). Because the contents and/or propellant within aerosol cans may be flammable, these cans may adversely impact human health and the environment if not properly disposed. In the absence of government intervention, facilities that generate waste aerosol cans (“generators”) would likely send them to municipal solid waste landfills (MSWLFs), which generally are less protective of human health and the environment than disposal at TSDFs.

While the RCRA Subtitle C requirements, when followed, reduce the risks associated with aerosol cans, facilities that generate hazardous aerosol can waste do not always manage these wastes in compliance with RCRA regulations. Many generators may not realize that aerosol cans are hazardous or may be unaware of the proper method of disposing of these wastes. In response to this and other concerns, EPA has proposed a rule to designate aerosol cans as Universal Waste (UW). The UW designation will reduce the regulatory burden and cost of properly disposing of aerosol cans, creating an incentive for generators to dispose of them appropriately. EPA expects the designation of aerosol cans as UW to reduce the burden of information collection requirements associated with the Hazardous Waste Generator Improvements Rule.

The key provisions of the proposed rule to designate aerosol cans as Universal Waste include the following:

- Aerosol cans managed under the proposed rule are not counted toward a facility’s RCRA generator status.

- The existing universal waste requirements currently applicable to small quantity handlers of universal waste (SQHUWs) and large quantity handlers of universal waste (LQHUWs) will also be applicable to handlers of aerosol can waste. For both SQHUWs and LQHUWs, these requirements include waste management standards, labeling and marking, accumulation time limits, employee training, response to releases, requirements related to off-site shipments, and export requirements. LQHUWs are also subject to additional notification and tracking requirements.
- All handlers must manage their universal waste aerosol cans in a manner designed to prevent fire, explosion, and unauthorized releases to the environment.
- The containers in which aerosol cans are stored should be labeled to easily identify what is in them. EPA is proposing that one of the following phrases be used for labeling the containers; “Universal Waste-Aerosol Cans”, “Waste Aerosol Cans” or “Used Aerosol Cans”.
- Generators of waste aerosol cans will be allowed to ship waste aerosol cans to other handlers without using a hazardous waste manifest or a hazardous waste transporter.
- Generators of waste aerosol cans will be allowed to puncture and drain the cans prior to shipping, storing, or recycling them.

This ICR is a description of the reduction in burden associated with the information collection requirements for the Hazardous Waste Generator Improvements Rule as a result of the designation of aerosol cans as universal waste. This ICR does not describe the new information collection requirements associated with handling aerosol cans as universal waste. The increase in burden associated with universal waste information collection requirements is described in ICR 1597.12.

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 will use the collected information to ensure that hazardous waste generators manage their waste in a cost-effective manner that minimizes risks to human health and the environment.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

None of the information required by the proposed rule to designate aerosol cans as Universal Waste (UW) will duplicate information required of hazardous waste generators by existing RCRA regulations.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA will open a 60-day public comment period at the time that the proposed rule to designate aerosol cans as Universal Waste (UW) is published in the *Federal Register*. To assist the public in commenting on the proposal, EPA raised a number of issues in the preamble to the proposed rule and asked for the public to comment on them. At the end of the comment period, EPA will review public comments received in response to the notice and will address comments received, as appropriate.

3(c) Consultations

EPA published a Notice of Data Availability (NODA) in 2014, entitled “Hazardous Waste Management and the Retail Sector: Providing and Seeking Information on Practices to Enhance Effectiveness to the Resource Conservation and Recovery Act Program.”¹ The NODA focused on the retail sector and solicited information regarding the hazardous waste management practices of establishments. EPA received 44 comments from stakeholders, and more than one-third of the respondents focused on the regulatory framework for managing retail products, including aerosol cans, as universal waste. Many of the comments focused on the very large number of generators of aerosol can waste in the retail sector.

3(d) Effects of Less Frequent Collection

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

¹ EPA. (2014). Hazardous Waste Management and the Retail Sector: Providing and Seeking Information on Practices to Enhance Effectiveness to the RCRA Program. Docket ID: EPA-HQ-RCRA-2012-0426. <https://www.regulations.gov/document?D=EPA-HQ-RCRA-2012-0426-0001>

Section 3007(b) of RCRA and 40 *CFR* Part 2, Subpart B, which defines EPA’s general policy on public disclosure of information, contain provisions for confidentiality. However, the Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the proposed rule. If such a claim is asserted, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

3(g) Sensitive Questions

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

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

The following is a list of North American Industrial Classification System (NAICS) codes associated with the facilities most likely to be affected by the information collection requirements covered in this ICR. This list includes all of the NAICS codes EPA identified for generators of aerosol can hazardous waste in the 2015 BR database. 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
44-45	Retail Trade
31-33	Manufacturing
48-49	Transportation and Warehousing
62	Health Care and Social Assistance
92	Public Administration
61	Educational Services
54	Professional, Scientific, and Technical Services
56	Administrative and Support and Waste Management and Remediation Services
42	Wholesale Trade
22	Utilities
81	Other Services (except Public Administration)
21	Mining, Quarrying, and Oil and Gas Extraction
23	Construction
71	Arts, Entertainment, and Recreation
55	Management of Companies and Enterprises
53	Real Estate and Rental and Leasing
51	Information

NAICS	NAICS CATEGORY
11	Agriculture, Forestry, Fishing and Hunting

The information collection requirements of the proposed rule vary based on facility generator and handler status. The proposed rule is expected to affect facilities within all three hazardous waste generators categories:

- Large Quantity Generators (LQGs): Monthly generation \geq 1.1 tons HW or $>$ 0.001 tons acute HW
- Small Quantity Generators (SQGs): Monthly generation $>$ 0.11 tons HW and $<$ 1.1 tons HW and \leq .001 acute HW
- Very Small Quantity Generators (VSQGs): Monthly generation \leq .11 tons HW and \leq 0.001 acute HW per month

Additionally, the proposed rule is expected to affect both categories of universal waste handlers:

- Large Quantity Handlers (LQHs): Annual generation \geq 5.5 tons UW per year
- Small Quantity Handlers (SQHs): Annual generation $<$ 5.5 tons UW per year

If facilities generate hazardous and universal wastes, they may be classified as both generators and handlers. Overall, the information collection requirements for hazardous waste generators are more stringent than the requirements for universal waste handlers.

4(b) Information Requested

This section describes information collection requirements applicable to entities that will be affected by the proposed rule. All of the provisions in the proposed rule are intended to provide greater flexibility to certain classes of hazardous waste generators.

Notification

Under existing RCRA requirements, LQGs and SQGs must notify EPA of aerosol can hazardous waste management activities. As part of the notification process, generators are 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.

Rule Familiarization

This ICR assumes that new facilities that decide to manage their aerosol cans as hazardous waste will spend a limited amount of legal, managerial, and technical time reviewing existing hazardous waste regulations.

Closure

Under current regulations, new LQGs incur costs for the development of a closure plan. These costs reflect the development of descriptions of necessary closure activities, estimation of closure costs, and writing of the closure schedule.

Contingency Planning

Under current regulations, new LQGs are assumed to incur costs for the development of a contingency plan. Development of a contingency plan involves the collection of data, documentation of input from authorities, drafting of the contingency plan, and submission of the contingency plan to relevant emergency centers.

Annual Review of Regulations

This ICR assumes that LQGs and SQGs conduct an annual review of hazardous waste regulations to keep up to date on regulatory developments. This review involves a limited amount of legal, managerial, and technician time.

Subtitle C Recordkeeping

Under the RCRA Subtitle C regulations, LQGs and SQGs are required to maintain records of waste characterizations for three years from the date the last waste was sent off site. In addition, LQGs and SQGs must gather and provide information as requested by EPA or state regulators.

Biennial Reporting

Under current regulations, LQGs must submit biennial reports of their hazardous waste generation activity to EPA or state authorities. The fixed costs of preparing a biennial report include the time to read the instructions, complete the site ID form, gather information and prepare a GM form, submit the report to state authorities or EPA, and maintain a copy of the report for three years.

Personnel Safety Training

Under current regulations, large quantity handlers of universal waste must ensure that all employees are thoroughly familiar with proper aerosol can waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

Manifest Training

This ICR assumes that under existing regulations, facilities train employees to complete manifests. As part of this training, this ICR assumes facilities will use EPA's free online hazardous waste manifest video.

Labeling

Under existing RCRA requirements, 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, 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.

Manifesting and Land Disposal Restriction Notification

LQGs and SQGs are required to prepare a manifest for each hazardous waste shipment and maintain a copy of the manifest for three years. All facilities are also required to submit a landban notification for each shipment. Additionally, hazardous waste generators are required to file exception reports if a copy of a completed manifest signed by the designated facility is not received within a specified timeframe (45 days for LQGs, 60 days for SQGs).

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

5(a) Agency Activities

Most of the information that is required of hazardous waste generators would be kept on site and not submitted to EPA formally. The Agency will conduct the following activities in response to notification of universal waste management activity by generators:

- Review and file notification of hazardous waste management provided by generators;
- Send an EPA identification number to generators; and
- Enter notification information into a database.

5(b) Collection Methodology and Management

In collecting and analyzing the information required by the Hazardous Waste Generator Improvements Rule, the Agency will rely upon hard copy forms, electronic submissions, and applicable database software, where appropriate.

5(c) Small Entity Flexibility

Some respondents will be small organizations. However, all of the provisions in the aerosol can universal waste proposed rule are intended to provide greater flexibility to facilities involved in aerosol can management. Some facilities that are currently SQGs may become LQHUWs or SQHUWs. Regulatory requirements for handlers of universal waste are considerably simpler than those applicable to small quantity generators of hazardous waste.

Additionally, EPA exempted SQHUWs from several administrative requirements applicable to LQHUWs. For example, EPA does not require SQHUWs of universal wastes to submit notifications of universal waste management or to obtain an EPA identification number. EPA also does not require SQHUWs of aerosol can wastes to keep records of their universal waste shipments. EPA believes these exemptions will encourage small businesses to safely manage aerosol can waste in compliance with the regulation.

Finally, the aerosol can universal waste rule is a regulatory relief initiative that should reduce regulatory burden and costs for universal waste handlers, but should particularly benefit small entities.

5(d) Collection Schedule

LQGs will have to report biennially for all the waste streams generated under the 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

The RIA for the proposed designation of aerosol cans as a Universal Waste estimates cost impacts to hazardous waste generators as a range to address uncertainties regarding several unit cost inputs for the analysis. This ICR uses the high-end estimates for these inputs.²

6(a) Estimating Respondent Burden

Exhibit 1 summarizes the change to respondent burden associated with the new paperwork requirements for hazardous waste generators included in the proposed rule to designate aerosol cans as Universal Waste. EPA expects that the proposed rule will result in a reduction in burden associated with information collection requirements for generators of aerosol can hazardous waste. This decrease in burden reflects reduced paperwork requirements at facilities that change generator status as a result of the proposed rule. As shown in the exhibit, the expected decrease in burden for generators of hazardous waste is a total of 45,086 hours annually under the provisions of the proposed rule. Thus, the total number of hours saved during the first three years is estimated to be approximately 135,258 hours. The cumulative impact of

² Overall, the low-end costs estimated in the RIA are less than two percent lower than the high-end costs. The low-end and high-end estimates are discussed in greater detail in U.S. EPA, Regulatory Impact Analysis of Proposed Rule To Add Aerosol Cans to the Universal Waste Rule, September 2017.

the proposed rule (when viewed in conjunction with ICR 1597.12) is a net decrease of 39,113 annual burden hours.

The expected annual reductions in respondent burden reflect savings within three broad categories of costs: (a) one-time costs associated with new facilities that enter the universe of affected facilities each year, (b) fixed annual costs that remain relatively constant from year to year, and (c) variable costs that occur throughout the year and vary by the number of hazardous waste shipments made by each facility. Facilities that change generator status as a result of the proposed rule are expected to experience cost savings across each of these three categories. Additionally, facilities that do not change generator status but begin shipping aerosol cans as universal waste are expected to experience reductions in variable costs.

6(b) Estimating Respondent Costs

Exhibit 1 also summarizes the total cost savings for avoided information collection activities associated with the proposed rule by respondent generator and handler status before and after the proposed rule. Additional detailed information on the costs and cost savings of each rule provision by generator and handler status is provided in Exhibits 3A-E. These cost and cost saving estimates reflect the cost of labor as well as operations and maintenance (O&M) costs where applicable. As shown in Exhibit 1, the average annual reduction in cost burden during the first three years of the proposed rule is \$2.43 million. Of this \$2.43 million, \$2.37 million is the total reduction in burden for labor costs and \$0.06 million is the total reduction in burden for O&M costs, as summarized in Exhibits 3A-E.

Labor Costs

For purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$160.74 for legal staff, \$113.78 for managerial staff, \$49.22 for technical staff, and \$37.11 for clerical staff. These hourly labor costs were obtained from the following sources:

- Hourly Wage: Bureau of Labor Statistics, occupational earnings data for May 2016.³
- Fringe Benefit Cost Factor: Bureau of Labor Statistics, Employer Costs for Worker Compensation, released June 9, 2017. Table 10: Employer Costs per Hour Worked for Employee Compensation and Costs as a Percent of Total Compensation: Private Workers, by Industry Group, March 2017.
- Overhead Loading Factor: Remedial Action Cost Engineering and Requirements (RACER) cost estimating software 2005 defaults.

³ Bureau of Labor Statistics, May 2016 National Occupational Employment and Wage Estimates. Accessed August 2017 at http://www.bls.gov/oes/current/oes_nat.htm.

The overhead cost adjustment factor is approximately 1.336.⁴ Because industry-specific data is not readily available, this RIA uses the overhead cost adjustment factor from the Remedial Action Cost Engineering Requirements (RACER) System software (a cost estimating software) 2005 defaults. This RIA assumes that costs included in the overhead cost adjustment factor generally do not overlap with the overhead costs estimated directly in the RIA. The overhead cost adjustment factor does not explicitly include the direct administrative or fixed costs associated with implementing the regulatory requirements of RCRA, which are estimated directly in the RIA.⁵ Importantly, there are drawbacks to accounting for overhead costs by adjusting hourly labor rates. Overhead costs might not vary with the magnitude of changes in labor caused by the rule. Some of the overhead costs that facilities experience are unlikely to vary continuously with quantities of labor. However, due to the lack of facility-specific data and due to the inherent uncertainty in the changes in overhead costs associated with changes in labor hours devoted to regulatory compliance, this RIA concludes that the average relationship is the best that can be approximated. In order to ensure that this RIA fully captures the opportunity cost of a unit of time associated with RCRA regulatory compliance, this RIA relies on the RACER overhead cost adjustment factor.

Operation & Maintenance Costs

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: costs of postage/shipping (approximately \$2.00 to \$4.00/doc) and photocopies (approximately \$0.10 to \$0.15/page). This ICR also includes a class fee for personnel safety training (\$128) and O&M costs associated with creating a closure plan (\$7,000).

6(c) Estimating Agency Burden and Costs

The Agency burden hours and costs associated with all the requirements covered in this ICR are reported in Exhibit 4. This ICR uses the 2017 Federal Pay Schedule salary figures to estimate hourly compensation of EPA legal, managerial, technical, and clerical staff.⁶ For purposes of this ICR, the following government services levels were assigned:

- Legal Staff: GS-15, Step 5 (\$115.31/hr)
- Managerial Staff: GS-13, Step 5 (\$82.95/hr)

⁴ Loaded labor rates are adjusted to include 2 percent general and administrative overhead, 16.6 percent fixed overhead, 5 percent insurance, and 10 percent profit ($1 + 0.02 + 0.166 + 0.05 + 0.10 = 1.336$) estimated using RACER cost estimating software 2005 defaults. General and administrative cost overhead can include expenses such as human resources, payroll, accounting, sales personnel, executive salaries, legal fees, office supplies, equipment, communications, administrative buildings, office space, travel, subscriptions, and other overhead items related to administrative activities that support operating labor. Fixed overhead can include a proportion of the cost of building services (e.g., medical, safety, recreation, general engineering, general plant maintenance, janitorial, and cafeteria), electricity, heating, interplant transportation, warehouses, shipping and receiving facilities, insurance, and other resources shared throughout the organization in support of operating labor.

⁵ Additionally, this overhead cost adjustment factor, when applied to the loaded labor rates, is in line with the "Guidelines for Regulatory Impact Analysis." (U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis," 2016. Available at: https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)

⁶ U.S. Office of Personnel Management, Salary Table 2017-GS, Incorporating the 1% General Schedule Increase, Effective January 2017, Hourly Basic Rates by Grade and Step, accessed at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/> September 26, 2017.

- Technical Staff: GS-11, Step 5 (\$58.21/hr)
- Clerical Staff: GS-06, Step 5 (\$35.39/hr)

The hourly rates above reflect base salary plus the fringe benefit and overhead factors cited above.

Estimating State and Local Authority Burden and Cost Savings

Changes in facility generator status as a result of the proposed rule may lead to reductions in burden hours for state agencies, as they will receive fewer Biennial Report submissions to review and process. Exhibit 5 presents the estimated changes in burden hours and associated cost savings for state agencies. For the purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$65.22 for legal staff, \$61.22 for managerial staff, \$36.63 for technical staff, and \$23.36 for clerical staff. These hourly labor costs were obtained from the ICR for EPA’s 2017 Hazardous Waste Report.⁷

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

Respondent Universe

Exhibit 2 reports the estimated annual universe of facilities that choose to opt in to each of the provisions of the proposed rule to designate aerosol cans as Universal Waste. The total estimated annual number of respondents is 639. EPA identified 18,900 additional facilities that generate aerosol can wastes that may choose to opt in to the rule provisions. However, EPA’s economic analysis in the RIA determined that these facilities are likely to find it less costly to continue managing aerosol cans as hazardous waste.

Respondent Burden and Cost

Based on the universe data presented in Exhibit 2, this section estimates the change in respondent burden associated with all of the information collection requirements covered in this ICR. The total changes in respondent burden and cost are reported in Exhibits 3A-E. The additional flexibility under the proposed rule to designate aerosol cans as Universal Waste will result in a net reduction in burden to generators of aerosol can hazardous waste that opt in to the rule provisions. This section describes the assumptions used in developing the burden estimates.

One Time Costs

EPA estimates one-time cost savings for facilities that enter the universe of facilities affected by the rule in a given year. Facilities are assumed to realize these cost savings only in the year in which they enter the affected universe. EPA assumes that new facilities will open at a rate equal to 5.9 percent of the size of the universe each year.⁸

⁷ U.S. EPA, Supporting Statement for EPA Information Collection Request Number 0976.18 “2017 Hazardous Waste Report, Notification of Regulated Waste Activity, and Part A Hazardous Waste Permit Application and Modification,” December 2016.

⁸ EPA estimated this percentage based on the average establishment entry rate from the 2014 Business Dynamic Statistics for the two most common NAICS codes among generators of waste aerosol cans (Retail Trade and Manufacturing).

Notification

Under current regulations, new LQGs and SQGs that enter the universe incur costs to notify EPA of hazardous waste activity. This ICR estimates notification costs of approximately \$62 per facility. This cost reflects 0.08 hours of managerial time, 0.93 hours of technician time, and 0.08 hours of administrative time, as well as an O&M cost of approximately \$3.85. The proposed rule to designate aerosol cans as universal waste removes the hazardous waste notification requirements for new LQHs and SQHs that enter the post-rule universe. This ICR estimates that 28 new LQHs and SQHs will enter the post-rule universe each year and realize the cost savings associated with the avoided requirements.

Rule Familiarization

Under current regulations, new facilities that enter the regulatory universe in a given year are assumed to incur costs to familiarize themselves with existing hazardous waste regulations. This ICR assumes that rule familiarization requires 9.5 hours of legal time, 1 hour of managerial time, and 2 hours of technician time at a cost of \$1,739. Under the proposed rule to designate aerosol cans as universal waste, new LQHs and SQHs that enter the regulatory universe are not expected to spend labor time on familiarization with hazardous waste generator rules. As a result, new LQHs and SQHs are expected to save \$1,739 on rule familiarization as a result of the proposed rule.

Development of Closure Plan

Under current regulations, new LQGs incur costs for the development of a closure plan. These costs reflect the development of descriptions of necessary closure activities, estimation of closure costs, and writing of the closure schedule. In total, this ICR estimates that these costs are approximately \$8,509 per new LQG. New facilities that enter the universe as SQGs, LQHs, or SQHs instead of LQGs as a result of the proposed rule to designate aerosol cans as universal waste will not need to develop closure plans and will experience cost savings relative to current regulations. This ICR estimates that three facilities that enter the universe each year will experience these cost savings.

Contingency Planning

Under current regulations, new LQGs are assumed to incur costs for the development of a contingency plan. Development of a contingency plan involves the collection of data, documentation of input from authorities, drafting of the contingency plan, and submission of the contingency plan to relevant emergency centers. This ICR estimates that the total cost of these

https://www.census.gov/ces/dataproducts/bds/data_firm.html

activities, per plan, is \$731. New facilities that enter the universe as SQGs, LQHs, or SQHs instead of LQGs as a result of the proposed rule to designate aerosol cans as universal waste will not need to develop contingency plans and will experience cost savings relative to current regulations. This ICR estimates that three facilities that enter the universe each year will experience these cost savings.

Fixed Annual Costs

Fixed annual costs include costs that typically remain unchanged from year to year for facilities potentially affected by the proposed rule.

Annual Review of Regulations

To keep up to date on regulatory developments, LQGs and SQGs are assumed to conduct an annual review of hazardous waste regulations in the baseline. This review involves a limited amount of legal, managerial, and technician time, estimated to cost LQGs \$93 and SQGs \$61. Under the proposed rule to designate aerosol cans as universal waste, universal waste handlers are not expected to incur costs associated with an annual review of hazardous waste regulations. As a result, facilities that change generator status from LQG are expected to experience cost savings as a result of the proposed rule. This ICR estimates that 44 facilities will change generator status from LQG to SQG and realize cost savings of \$32 each year, 6 facilities will change generator status from LQG to LQH and realize cost savings of \$93 each year, and 477 facilities will change generator status from SQG to LQH or SQH and realize cost savings of \$61.

Recordkeeping

Under the RCRA Subtitle C regulations, LQGs and SQGs are required to maintain records of waste characterizations for three years from the date the last waste was sent off site. In addition, LQGs and SQGs must gather and provide information as requested by EPA or state regulators. Combined, these activities involve 0.25 hours of managerial time and 0.2 hours of a technician's time per year. Combined with O&M costs of \$2.50 to \$3.00, these costs amount to approximately \$41 per facility. Under the proposed rule to designate aerosol cans as universal waste, facilities that change generator status from LQG or SQG to VSQG will not be required to maintain records and will no longer incur these costs. As a result, the \$41 reflects an annual cost-saving for these facilities. This ICR estimates that 483 facilities will become VSQGs and realize these cost-savings as a result of the proposed rule.

Biennial Reporting

Under current regulations, LQGs must submit biennial reports of their hazardous waste generation activity to EPA or state authorities. The fixed costs of preparing a biennial report

include the time to read the instructions, complete the site ID form, gather information and prepare a GM form, submit the report to state authorities or EPA, and maintain a copy of the report for three years. The total cost per cycle per LQG is approximately \$837. On an annualized basis, this translates to a cost of \$463. Facilities that change generator status from LQG to SQG or LQG to VSQG as a result of the proposed rule to designate aerosol cans as universal waste will not have to submit biennial reports. As a result, these facilities will realize cost-savings of \$463 per year under the proposed rule. This ICR estimates that 50 LQGs will change generator status as a result of the proposed rule and realize these cost savings.

Annual Employee Training

Under current regulations, the unit cost associated with training relevant employees at generator facilities was estimated separately for SQGs and LQGs. To estimate training costs for SQGs, EPA assumes that such facilities will conduct informal training for two technicians and one manager. EPA assumes that each of these employees receives four hours of training and that four hours of a manager's time are necessary to compile EPA guidance documents, fact sheets, and information on relevant company standard operating procedures.⁹ Based on this information, EPA estimates that hazardous waste handler training for an SQG costs \$1,341 per year per facility.

Relative to SQGs, EPA assumes that LQGs will conduct more formalized training using an online training course supplemented with facility-specific information.¹⁰ More specifically, EPA assumes that four technicians and two managers receive eight hours of training per year. In addition, the estimate of annual LQG training costs include 0.6 hours of clerical time for administrative requirements associated with the training (e.g. updating records, refresher/new class scheduling, etc.). The class fee is estimated as \$127 per trainee based on pricing from on-line providers, and facilities are assumed to incur an additional record-keeping cost of approximately \$3 per year. Based on the above, we estimate that hazardous waste handler training at LQGs costs \$4,192 per facility per year.

In addition to the general hazardous materials handling training, it is assumed that each SQG and LQG will train one technician and one manager to complete hazardous waste manifests once every three years.¹¹ This ICR assumes each facility trains one manager and one technician to complete manifests. Employees are expected to receive a four-hour manifest training session once every three years. As part of this training, this ICR assumes facilities will use EPA's free online hazardous waste manifest video.¹² The cost of manifest training also includes one hour of a manager's time to compile EPA's hazardous waste manifest instructions and other training materials. Approximately 0.3 hours of administrative time will likely be incurred to schedule the training every three years. Based on these estimates, the cost of manifest training is

⁹ Assumptions based on training cost assumptions in U.S. EPA, Regulatory Impact Analysis for the 2008 Final Rule Amendments to the Industrial Recycling Exclusions of the RCRA Definition of Solid Waste, September 25, 2008.

¹⁰ Ibid.

¹¹ U.S. EPA, ICR 801.18 "Requirements for Generators, Transporters, and Waste Management Facilities Under the RCRA Hazardous Waste Manifest System." 2012..

¹² U.S. Environmental Protection Agency, Hazardous Waste Manifest System, accessed at <http://www.epa.gov/osw/hazard/transportation/manifest/index.htm> on December 24, 2012.

approximately \$777 per facility once every three years (an annualized cost of \$296, using a 7 percent discount rate).

Under the proposed rule to designate aerosol cans as universal waste, this ICR estimates that 44 facilities will change generator status from LQG to SQG. EPA expects these facilities to realize annual cost savings of \$2,851 due to less formal training requirements. Additionally, this ICR estimates that 6 facilities will change generator status from LQG to VSQG. These facilities are expected to realize savings equivalent to the full cost of LQG training, or approximately \$4,192 each year. This ICR also estimates that 477 SQGs will change generator status from SQG to VSQG. EPA expects these facilities to realize savings equivalent to the full cost of SQG training, or \$1,341 each year.

Labeling (baseline)

Under the baseline, all containers at LQGs and SQGs must be marked with the words “Hazardous Waste,” an indication of the hazards of the contents of the container, and the accumulation start date once the accumulate start date begins. This ICR assumes that a trained technician would label the containers. Under the proposed rule to designate aerosol cans as universal waste, this ICR estimates that 483 LQGs and SQGs will become VSQGs and no longer need to label aerosol can waste. These facilities will realize cost-savings of approximately \$25 (SQGs) to \$74 (LQGs) each year.

Inspections (baseline)

LQGs and SQGs are required to conduct weekly inspections of hazardous waste storage areas. This ICR assumes that a technician takes one hour to inspect all storage areas for an LQG or SQG, which implies a weekly inspection cost of \$49.22 per LQG or SQG. On an annual basis, this translates to a cost of \$2,560 per LQG or SQG. This ICR estimates that 483 LQGs and SQGs will become VSQGs as a result of the proposed rule to designate aerosol cans as universal waste and will no longer be required to conduct weekly inspections. These facilities will save \$2,560 each year.

Variable Costs

Variable costs include those costs that are experienced throughout the year and vary by the number of hazardous waste shipments made by each facility. As a result, these costs are dependent on the quantity of hazardous waste shipped by each facility and a facility’s RCRA storage limit, which is dependent on its generator status.

Manifesting and Land Disposal Restriction Notification

SQGs and LQGs are required to prepare a manifest for each hazardous waste shipment and maintain a copy of the manifest for three years. All facilities are also required to submit a landban notification for each shipment. The cost to complete the manifest and landban

notification is estimated at \$58 per shipment for LQGs and \$56 per shipment for SQGs.¹³ Hazardous waste generators are also required to file exception reports if a copy of a completed manifest signed by the designated facility is not received within a specified timeframe (45 days for LQGs, 60 days for SQGs). This is an infrequent and unpredictable event; therefore costs associated with this activity were not estimated for this analysis.

Under the universal waste rule requirements, LQHs and SQHs are not required to complete manifests and landban notification. As a result, facilities that choose to ship aerosol cans as universal waste following the proposed rule are expected to save \$56 to \$58 per shipment. This ICR estimates that 639 facilities will ship aerosol cans as universal waste post-rule and will experience these cost savings.

6(e) Bottom Line Burden Hours and Cost Tables

Exhibit 1 summarizes the average annual cost savings of the proposed rule for the first three years by respondent type. Exhibit 2 presents the total number of respondents that are expected to experience cost savings associated with avoided hazardous waste generator information collection. Exhibits 3A-E provide additional detail on the burden and cost saving estimates. Exhibit 4 presents the change in Agency burden.

6(f) Reasons for Change in Burden

As described in this ICR, EPA expects that the proposed rule to designate aerosol cans as Universal Waste will result in a reduction in burden to generators of aerosol can hazardous waste. The expected annual decrease in burden for generators of hazardous waste is a total of 45,086 hours under the provisions of the proposed rule. This corresponds to a cumulative decrease in burden of 135,258 hours for the first three years following the rule. This decrease in burden reflects reduced paperwork requirements at facilities that ship aerosol cans as universal waste as a result of the proposed rule. The majority of the decrease in burden is associated with facilities that change generator status as a result of the designation of aerosol cans as universal waste. This ICR does not take into account the increase in burden for compliance with information collection requirements specific to management of aerosol cans as universal waste, which is described in ICR 1597.12. The cumulative impact of the proposed rule (when viewed in conjunction with ICR 1597.12) is a net decrease of 39,113 annual burden hours.

¹³ Manifests costs from U.S. EPA, Supporting Statement for Information Collection Request Number 801.20 "Requirements for Generators, Transporters, and Waste Management Facilities Under the RCRA Hazardous Waste Manifest System." April 2015. Landban notification costs from U.S. EPA, Economic Analysis of Including Mercury Containing Equipment in the Universal Waste System: Final Rule. February 15, 2002 (revised May 9, 2005).

Exhibit 1: Average Annual Reduction in Respondent Burden and Cost Savings Estimates for the First Three Years

Respondent Type	Total Respondents	Total Hours	Total Labor Costs	O&M Costs	Total Cost
Remain LQG	112	2,455	\$32,175	\$495	\$32,670
LQG to SQG	44	2,352	\$128,800	\$52,004	\$180,803
LQG to LQH	6	995	\$46,590	\$7,146	\$53,736
SQG to LQH	92	8,190	\$415,938	\$406	\$416,345
SQG to SQH	385	31,094	\$1,746,940	\$1,707	\$1,748,647
AVERAGE ANNUAL COST SAVINGS FOR THE FIRST THREE YEARS		45,086	\$2,370,443	\$61,758	\$2,432,201
TOTAL COST SAVINGS FOR THE FIRST THREE YEARS		135,258	\$7,111,329	\$185,273	\$7,296,602
<p><u>Notes:</u> Numbers may not sum due to rounding.</p>					

Exhibit 2: Estimated Universe of Facilities Expected to Realize Cost Savings as a Result of the Aerosol Can Universal Waste Proposed Rule

Information Collection Activity	Number of Respondents					
	Remain LQG	LQG to SQG	LQG to LQH	SQG to LQH	SQG to SQH	Total
One Time Costs						
Notification of Hazardous Waste Activity	-	-		5	23	28
Rule Familiarization	-	-	0.4	5	23	28
Closure (create closure plan)	-	2.6	0.4	-	-	3
Contingency Planning	-	2.6	0.4	-	-	3
Annual Costs						
Annual Review of Regulations	-	44	6	92	385	527
Subtitle C Recordkeeping	-	44	6	92	385	527
Biennial Reporting (annualized cost)	-	44	6	-	-	50
Personnel Safety Training (annualized cost)	-	44	6	92	385	527
Manifest Training	-	44	6	92	385	527
Labeling	-	44	6	92	385	527
Inspections	-	44	6	92	385	527
Variable Costs						
Manifesting and Land Disposal Restriction Notification (per shipment)	112	44	6	92	385	639
Total	112	44	6	92	385	639

Notes:

Totals do not sum due to the fact that some the same facilities are subject to the same requirements.

Blank cells indicate that no facilities within the respondent category are expected to experience changes in respondent burden as a result of the proposed rule.

Exhibit 3A: Respondent Cost Savings Estimates for LQGs that remain LQGs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
VARIABLE COSTS											
Manifesting and Land Disposal Restriction Notification (per shipment)											
Complete the manifest	0.00	0.00	0.40	0.10	0.00	\$0.44	112	284	\$13,267.71	\$247.32	\$13,515.03
Complete the continuation sheet	0.00	0.00	0.19	0.04	0.00	\$0.44	112	130	\$6,144.36	\$247.32	\$6,391.68
Landban Notification Cost per shipment	0.00	0.50	2.10	1.00	0.00	\$0.00	112	2,041	\$12,763.17	\$0.00	\$12,763.17
TOTAL COST SAVINGS							N/A	2,455	32,175	495	32,670
Notes: Numbers may not sum due to rounding.											

Exhibit 3B: Respondent Cost Savings Estimates for LQGs that become SQGs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
ONE-TIME COSTS											
Notification of Hazardous Waste Activity											
Notification of Hazardous Waste Activity under RCRA Section 3010 - Initial Notification - Complete and submit EPA Form 8700-12	0.00	0.00	0.00	0.00	0.00	\$0.00	2.6	-	\$0	\$0	\$0
Rule Familiarization											
Rule familiarization with legal counsel	0.00	0.00	0.00	0.00	0.00	\$0.00	2.6	-	\$0	\$0	\$0
Closure (create closure plan)											
Write descriptions for the necessary closure activities	0.00	2.00	16.00	2.00	0.00	\$5,072.30	2.6	51.9	\$2,828	\$13,168	\$15,996
Estimate final closure cost	0.00	1.00	8.00	1.00	0.00	\$1,724.58	2.6	26.0	\$1,414	\$4,477	\$5,891
Write the closure schedule	0.00	0.25	1.00	0.00	0.00	\$0.00	2.6	3.2	\$202	\$0	\$202
Contingency Planning											
Collect data required in contingency plan	0.00	0.00	3.35	1.65	0.00	\$0.00	2.6	13.0	\$587	\$0	\$587
Document whether authorities decline arrangement	0.00	0.00	0.00	0.50	0.00	\$0.00	2.6	1.3	\$48	\$0	\$48
Write contingency plan	0.00	0.00	7.50	2.50	0.00	\$0.00	2.6	26.0	\$1,199	\$0	\$1,199
Submit contingency plan to relevant emergency centers	0.00	0.00	0.00	0.50	0.00	\$5.73	2.6	1.3	\$48	\$15	\$63
ANNUAL COSTS											
Annual Review of Regulations											
Read the Regulations	0.10	0.10	0.10	0.00	0.00	\$0.00	44	13.2	\$1,424	\$0	\$1,424
Subtitle C Recordkeeping											
Store, file, and maintain records of any test results, waste analyses, or other determinations	0.00	0.00	0.00	0.00	0.00	\$0.00	44	-	\$0	\$0	\$0
Gather, provide additional information requested by EPA	0.00	0.00	0.00	0.00	0.00	\$0.57	44	-	\$0	\$25	\$25
Biennial Reporting											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	0.00	\$0.00	44	121.4	\$5,003	\$0	\$5,003
Gather info. and prepare Form GM (per form)	0.00	0.13	0.15	0.04	0.00	\$0.00	44	14.1	\$11,264	\$0	\$11,264
Gather information and prepare Site ID Form (per form and per facility since 1 SI form per facility)	0.00	0.08	0.60	0.16	0.00	\$0.00	44	37.0	\$1,085	\$0	\$1,085
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	0.00	\$3.64	44	59.0	\$2,834	\$160	\$2,994
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.00	\$0.00	44	1.3	\$30	\$0	\$30

Exhibit 3B: Respondent Cost Savings Estimates for LQGs that become SQGs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
Personnel Safety Training											
Training	0.00	8.00	24.00	-0.40	0.00	\$773.84	44	1,390.4	\$91,376	\$34,049	\$125,425
Manifest Training											
Manifest Training (once every 3 years)	0.00	0.00	0.00	0.00	0.00	\$0.00	44	-	\$0	\$0	\$0
Labeling											
Label containers in 90-day accumulation (262.34(a)(2) and (3))	0.00	0.00	0.75	0.00	0.00	\$0.00	44	33.0	\$1,624	\$0	\$1,624
Label the containers in satellite accumulation (262.34(c))	0.00	0.00	0.25	0.00	0.00	\$0.00	44	11.0	\$541	\$0	\$541
Inspections											
Weekly inspections	0.00	0.00	0.00	0.00	0.00	\$0.00	44	-	\$0	\$0	\$0
VARIABLE COSTS											
Manifesting and Land Disposal Restriction Notification (per shipment HW)											
Complete the manifest	0.00	0.00	0.00	0.02	0.00	\$0.00	44	1.8	\$65	\$0	\$65
Complete the continuation sheet	0.00	0.00	0.01	0.01	0.00	\$0.00	44	1.8	\$76	\$0	\$76
Landban Notification Cost per shipment	0.00	0.00	0.00	0.00	0.00	\$0.00	44	-	\$0	\$0	\$0
Manifesting and Land Disposal Restriction Notification (per shipment UW)											
Complete the manifest	0.00	0.00	0.40	0.10	0.00	\$0.44	44	63.0	\$2,948	\$55	\$3,003
Complete the continuation sheet	0.00	0.00	0.19	0.04	0.00	\$0.44	44	29.0	\$1,365	\$55	\$1,420
Landban Notification Cost per shipment	0.00	0.50	2.10	1.00	0.00	\$0.00	44	453.6	\$2,836	\$0	\$2,836
TOTAL COST SAVINGS							N/A	2,352.1	\$128,800	\$52,004	\$180,803
<u>Notes:</u> Numbers may not sum due to rounding.											

Exhibit 3C: Respondent Cost Savings Estimates for LQGs that become LQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Manageria l \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
ONE-TIME COSTS											
Notification of Hazardous Waste Activity											
Notification of Hazardous Waste Activity under RCRA Section 3010 - Initial Notification - Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	0.00	\$3.85	0.4	0.4	\$20	\$1	\$22
Rule Familiarization											
Rule familiarization with legal counsel	9.50	1.00	2.00	0.00	0.00	\$0.00	0.4	4.4	\$616	\$0	\$616
Closure (create closure plan)											
Write descriptions for the necessary closure activities	0.00	2.00	16.00	2.00	0.00	\$5,072.30	0.4	7.1	\$386	\$1,796	\$2,181
Estimate final closure cost	0.00	1.00	8.00	1.00	0.00	\$1,724.58	0.4	3.5	\$193	\$611	\$803
Write the closure schedule	0.00	0.25	1.00	0.00	0.00	\$0.00	0.4	0.4	\$27	\$0	\$27
Contingency Planning											
Collect data required in contingency plan	0.00	0.00	3.35	1.65	0.00	\$0.00	0.4	1.8	\$80	\$0	\$80
Document whether authorities decline arrangement	0.00	0.00	0.00	0.50	0.00	\$0.00	0.4	0.2	\$7	\$0	\$7
Write contingency plan	0.00	0.00	7.50	2.50	0.00	\$0.00	0.4	3.5	\$164	\$0	\$164
Submit contingency plan to relevant emergency centers	0.00	0.00	0.00	0.50	0.00	\$5.73	0.4	0.2	\$7	\$2	\$9
ANNUAL COSTS											
Annual Review of Regulations											
Read the Regulations	0.25	0.25	0.50	0.00	0.00	\$0.00	6	6.0	\$559	\$0	\$559
Subtitle C Recordkeeping											
Store, file, and maintain records of any test results, waste analyses, or other determinations	0.00	0.00	0.10	0.00	0.00	\$0.00	6	0.6	\$30	\$0	\$30
Gather, provide additional information requested by EPA	0.00	0.25	0.10	0.00	0.00	\$3.03	6	2.1	\$200	\$18	\$218
Biennial Reporting											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	0.00	\$0.00	6	16.6	\$682	\$0	\$682
Gather information and prepare Form GM (per form)	0.00	0.13	0.15	0.04	0.00	\$0.00	6	1.9	\$1,536	\$0	\$1,536
Gather information and prepare Site ID Form (per form and per facility since 1 SI form per facility)	0.00	0.08	0.60	0.16	0.00	\$0.00	6	5.0	\$148	\$0	\$148

Exhibit 3C: Respondent Cost Savings Estimates for LQGs that become LQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Manageria I \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	0.00	\$3.64	6	8.0	\$387	\$22	\$408
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.00	\$0.00	6	0.2	\$4	\$0	\$4
Personnel Safety Training											
Training	0.00	16.00	32.00	0.60	0.00	\$773.84	6	291.6	\$20,507	\$4,643	\$25,150
Manifest Training											
Manifest Training (once every 3 years)	0.00	5.00	4.00	0.30	0.00	\$0.00	6	55.8	\$1,776	\$0	\$1,776
Labeling											
Label containers in 90-day accumulation (262.34(a)(2) and (3))	0.00	0.00	1.00	0.00	0.00	\$0.00	6	6.0	\$295	\$0	\$295
Label the containers in satellite accumulation (262.34(c))	0.00	0.00	0.50	0.00	0.00	\$0.00	6	3.0	\$148	\$0	\$148
Inspections											
Weekly inspections	0.00	0.00	52.00	0.00	0.00	\$0.00	6	312.0	\$15,357	\$0	\$15,357
VARIABLE COSTS											
Manifesting and Land Disposal Restriction Notification (per shipment)											
Complete the manifest	0.00	0.00	0.40	0.10	0.00	\$0.44	6	30.5	\$1,427	\$27	\$1,454
Complete the continuation sheet	0.00	0.00	0.19	0.04	0.00	\$0.44	6	14.0	\$661	\$27	\$688
Landban Notification Cost per shipment	0.00	0.50	2.10	1.00	0.00	\$0.00	6	219.6	\$1,373	\$0	\$1,373
TOTAL COST SAVINGS								994.5	\$46,590	\$7,146	\$53,736
Notes: Numbers may not sum due to rounding.											

Exhibit 3D: Respondent Cost Savings Estimates for SQGs that become LQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
ONE-TIME COSTS											
Notification of Hazardous Waste Activity											
Notification of Hazardous Waste Activity under RCRA Section 3010 - Initial Notification - Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	0.00	\$3.85	5	6	\$313	\$21	\$334
Rule Familiarization											
Rule familiarization with legal counsel	9.50	1.00	2.00	0.00	0.00	\$0.00	5	68	\$9,408	\$0	\$9,408
ANNUAL COSTS											
Annual Review of Regulations											
Read the Regulations	0.15	0.15	0.40	0.00	0.00	\$0.00	92	64	\$5,580	\$0	\$5,580
Subtitle C Recordkeeping											
Store, file, and maintain records of any test results, waste analyses, or other determinations	0.00	0.00	0.10	0.00	0.00	\$0.00	92	9	\$451	\$0	\$451
Gather, provide additional information requested by EPA	0.00	0.25	0.10	0.00	0.00	\$2.46	92	32	\$3,059	\$226	\$3,285
Personnel Safety Training											
Training	0.00	8.00	8.00	1.00	0.00	\$0.00	92	1,559	\$122,955	\$0	\$122,955
Manifest Training											
Manifest Training (once every 3 years)	0.00	5.00	4.00	0.30	0.00	\$0.00	92	853	\$27,142	\$0	\$27,142
Labeling											
Label containers in 90-day accumulation (262.34(a)(2) and (3))	0.00	0.00	0.25	0.00	0.00	\$0.00	92	23	\$1,128	\$0	\$1,128
Label the containers in satellite accumulation (262.34(c))	0.00	0.00	0.25	0.00	0.00	\$0.00	92	23	\$1,128	\$0	\$1,128
Inspections											
Weekly inspections	0.00	0.00	52.00	0.00	0.00	\$0.00	92	4,767	\$234,663	\$0	\$234,663
VARIABLE COSTS											
Manifesting and Land Disposal Restriction Notification (per shipment)											
Complete the manifest	0.00	0.00	0.40	0.08	0.00	\$0.44	92	88	\$4,155	\$80	\$4,235

Exhibit 3D: Respondent Cost Savings Estimates for SQGs that become LQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technical \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
Complete the continuation sheet	0.00	0.00	0.18	0.03	0.00	\$0.44	92	39	\$1,829	\$80	\$1,909
Landban Notification Cost per shipment	0.00	0.50	2.10	1.00	0.00	\$0.00	92	660	\$4,127	\$0	\$4,127
TOTAL COST SAVINGS								8,190	\$415,938	\$406	\$416,345
<u>Notes:</u> Numbers may not sum due to rounding.											

Exhibit 3E: Respondent Cost Savings Estimates for SQGs that become SQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technica I \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
ONE-TIME COSTS											
Notification of Hazardous Waste Activity											
Notification of Hazardous Waste Activity under RCRA Section 3010 - Initial Notification - Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	0.00	\$3.85	23	25	\$1,314	\$88	\$1,402
Rule Familiarization											
Rule familiarization with legal counsel	9.50	1.00	2.00	0.00	0.00	\$0.00	23	284	\$39,512	\$0	\$39,512
ANNUAL COSTS											
Annual Review of Regulations											
Read the Regulations	0.15	0.15	0.40	0.00	0.00	\$0.00	385	270	\$23,437	\$0	\$23,437
Subtitle C Recordkeeping											
Store, file, and maintain records of any test results, waste analyses, or other determinations	0.00	0.00	0.10	0.00	0.00	\$0.00	385	39	\$1,895	\$0	\$1,895
Gather, provide additional information requested by EPA	0.00	0.25	0.10	0.00	0.00	\$2.46	385	135	\$12,848	\$948	\$13,796
Personnel Safety Training											
Training	0.00	8.00	8.00	1.00	0.00	\$0.00	385	6,546	\$516,410	\$0	\$516,410
Manifest Training											
Manifest Training (once every 3 years)	0.00	5.00	4.00	0.30	0.00	\$0.00	385	3,581	\$113,995	\$0	\$113,995
Labeling											
Label containers in 90-day accumulation (262.34(a)(2) and (3))	0.00	0.00	0.25	0.00	0.00	\$0.00	385	96	\$4,738	\$0	\$4,738
Label the containers in satellite accumulation (262.34(c))	0.00	0.00	0.25	0.00	0.00	\$0.00	385	96	\$4,738	\$0	\$4,738
Inspections											
Weekly inspections	0.00	0.00	52.00	0.00	0.00	\$0.00	385	20,023	\$985,585	\$0	\$985,585
VARIABLE COSTS											
Manifesting and Land Disposal Restriction Notification (per shipment)											
Complete the manifest	0.00	0.00	0.40	0.08	0.00	\$0.44	385	370	\$17,449	\$336	\$17,785

Exhibit 3E: Respondent Cost Savings Estimates for SQGs that become SQHs Post-Rule

Information Collection Activity	Hours and Costs Savings Per Respondent Per Activity						Total Hours and Cost Savings				
	Legal \$160.74	Managerial \$113.78	Technica l \$49.22	Admin. \$37.11	Programmer \$95.72	O&M Cost (2017\$)	Number of Resp.	Total Hours	Total Labor Costs	Total O&M Costs	Total Cost
Complete the continuation sheet	0.00	0.00	0.18	0.03	0.00	\$0.44	385	162	\$7,681	\$336	\$8,017
Landban Notification Cost per shipment	0.00	0.50	2.10	1.00	0.00	\$0.00	385	2,772	\$17,335	\$0	\$17,335
TOTAL COST SAVINGS								31,094	\$1,746,940	\$1,707	\$1,748,647
<u>Notes:</u> Numbers may not sum due to rounding.											

Exhibit 4: Federal Agency Annual Reduction in Burden and Cost Savings Estimates for LQGs and SQGs that become LQHs and SQHs

Information Collection Activity	Hours and Costs Per Respondent Per Activity				Total Hours and Costs			
	Legal \$115.31/hr	Manager \$82.95/hr	Technical \$58.21/hr	Clerical \$35.39/hr	O&M Cost	Number of Resp.	Total Hours	Total Cost
NOTIFICATION								
Review notification for completeness and accuracy	0.00	0.00	0.25	0.00	0.00	28	7	\$414
Review letter requesting EPA ID number and enter this information into a database	0.00	0.00	1.58	0.17	0.00	28	50	\$2,791
Generate EPA ID number and send EPA ID number to facility	0.00	0.00	0.02	0.40	0.49	28	12	\$436
TOTAL						28	69	\$3,642
<u>Notes:</u> Numbers may not sum due to rounding.								

Exhibit 5: State Agency Annual Reduction in Burden and Cost Savings Estimates for LQGs that Change Generator Status

Information Collection Activity	Hours and Costs Per Respondent Per Activity					Total Hours and Costs		
	Legal \$65.22/hr	Manager \$61.22/hr	Technical \$36.63/hr	Clerical \$23.36/hr	O&M Cost	Number of Resp.	Total Hours	Total Cost
HAZARDOUS WASTE REPORT								
Key entry of report submissions	0.00	0.02	0.07	0.22	0.00	50	16	\$446
TOTAL						50	16	\$446

6(g) Burden Statement

The average per-facility reduction in public reporting and recordkeeping burden for this collection of information during the first year of the rule is estimated to be 22 hours for LQGs that remain LQGs post-rule, 53 hours for LQGs that become SQGs, 166 hours for LQGs that become LQHs, 89 hours for SQGs that become LQHs, and 81 hours for SQGs that become SQHs. Under the proposed rule, the total annual cost savings related to information collection requirements are estimated to be 2,445 hours for LQGs that remain LQGs, 2,352 hours for LQGs that become SQGs, 995 hours for LQGs that become LQHs, 8,190 hours for SQGs that become LQHs, and 31,094 hours for SQGs that become SQHs.

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-OLEM-2017-0463, 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-OLEM-2017-0463 and OMB Control Number 2050-0213 in any correspondence.