

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

**Renewal ICR**

**December 10, 2018**

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title of the Information Collection**

Collection of Information on Anaerobic Digestion Facilities Processing Wasted Food to support EPA's Sustainable Food Management (SFM)<sup>1</sup> Program.

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

EPA's SFM Program promotes the sustainable management of food which is a systematic approach that seeks to reduce wasted food and its associated impacts over its' entire lifecycle. The lifecycle of food includes use of natural resources, manufacturing, sales, and consumption and ends with decisions on recovery or final disposal. Diversion of food waste from landfills is a critical component of this effort. In order to effectively divert food waste from landfills, sufficient capacity to process the diverted materials is required. Knowledge of organics recycling capacity is needed to facilitate food waste diversion and anaerobic digestion facilities provide a significant amount of the needed capacity.

EPA's [food recovery hierarchy](#) prioritizes potential actions to prevent and divert wasted food. According to the hierarchy, processing wasted food via anaerobic digestion is a more desirable option than landfilling or incineration because it creates more benefits for the environment, society and the economy. Anaerobic digestion of food waste and other organic materials generates renewable energy, reduces methane emissions to the atmosphere, and provides opportunities to improve soil health through the production of soil amendments. EPA's SFM Program supports these efforts by educating state and local governments and communities about the benefits of wasted food diversion. EPA also builds partnerships with strategic partners interested in developing organics recycling capacity and provides tools and technical support to assist organizations in developing anaerobic digestion (AD) projects.

The nationwide collection of data about AD facilities processing food waste began in 2017 with a survey of all known AD facilities under the initial Information Collection Request (ICR No. 2533.01). EPA developed surveys for three different types of digesters: (1) stand-alone food waste digesters; (2) on-farm digesters that co-digest food waste; and (3) digesters at water resource recovery facilities (WRRFs) that co-digest food waste. The surveys are electronic and the data is automatically transmitted to EPA in spreadsheet form. Links to the surveys are distributed by email and made accessible on [EPA's AD website](#). The first report of findings based on this data was released in July 2018. This data allows EPA to:

- Verify the number and location of known AD facilities;

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<sup>1</sup> Identified as one of the three strategic priority areas in [EPA's Sustainable Materials Management Program's Strategic Plan \(2017-2022\)](#).

- Document the total processing capacity at these AD facilities;
- Document the types of food wastes, and the sources of these wastes, that are accepted at AD facilities;
- Document how much food waste was processed;
- Document how much biogas was produced;
- Analyze the end-uses of AD products (biogas and digestate); and,
- Understand additional information about AD facilities such as pre-processing/de-packaging activity, operational specifications, and gas cleaning systems.

To maintain accuracy over time, this information collection will be conducted annually followed by annual publication of the aggregated results. Respondents for this ICR are: (1) Project Developers; (2) Project Owners/Operators; and (3) Livestock Farmers. EPA, state and local governments and other stakeholders can use the results to:

- Track changes in the AD facility universe, processing capacity, amount food waste processed, and biogas production over time;
- Document trends in feedstock sources and types of feedstock processed;
- Focus efforts to decrease landfilling of wasted food; and
- Promote a better understanding of tipping fees, pre-processing/de-packaging activities, operational specifications, and gas cleaning systems.

This ICR provides a comprehensive description of information collection efforts, including the proposed minor revisions, 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. EPA estimates that approximately 250 surveys will be sent to AD facilities on an annual basis to request facility design and operational data. The actual cost for a respondent to complete the survey is anticipated to decrease slightly due to revised burden estimates and the elimination of several questions included in previous surveys. When the survey is implemented, the total annual respondent burden under this ICR is estimated to be 127 hours and \$7,594.

## **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. As the practice of organics diversion gains momentum in this country, the rate at which wasted food is diverted from landfills will continue to increase. The success of EPA's food waste diversion program is dependent on a steady increase of processing capacity over time. Prior to implementation of this ICR, EPA did not have the necessary data to demonstrate

this growth or to document a baseline processing capacity. This data is essential for EPA to evaluate agency activities designed to build such capacity. The importance of this type of data was also emphasized in [EPA's SMM Strategic Plan \(Fiscal Year 2017-2022\)](#).

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

EPA will use information submitted by respondents to update and expand its dataset of AD facilities. Development and maintenance of this dataset enables EPA to support its stakeholders through identification of viable outlets for diverted food waste. Analysis of facility locations by state also supports evaluation of various state waste and energy policies for effect on existing capacity as well as increases in capacity over time.

The data collected regarding design specifications, tipping fees, pre-processing of feedstocks, gas cleaning systems and end uses of AD products will increase EPA's ability to provide technical assistance to states and municipalities related to project design, implementation, cost effectiveness and successful business models. Collectively, these efforts are anticipated to have a positive impact on infrastructure development and industry growth overall.

EPA, state and local governments and other stakeholders can use the results to: track changes in facility universe, processing capacity, amount of food waste processed, and biogas production over time; document trends in feedstock sources and types processed; and focus efforts to decrease landfilling of wasted food.

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

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

For new respondents, the information to be collected has not been collected previously by EPA or any other federal agency. Comprehensive information about existing and new AD projects is not available through any other mechanism. To avoid requesting information that has already been collected, this data is collected annually for specific operational timeframes. Previously collected data covers operating years 2015 and 2016. Respondents are also given the opportunity to update other data parameters during each collection.

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

This Supporting Statement is associated with the second Federal Register notice for this ICR renewal. No comments were received during the first 60-day public comment period.

### **3(c) Consultations**

EPA staff contacted three respondents to request information on the estimated amount of time required to respond to the electronic survey. All respondents consulted reported that the survey took between 10 and 30 minutes to complete. When we discussed the proposed minor revisions to the survey for the 2019 collection, all respondents consulted indicated that these changes would result in shorter response times. Specifically, respondents reported that providing data for two operating years instead of one (which effects five survey questions) would not increase time estimate because the data is all stored in the same place. When gathering data for one operational year, the amount of time needed to obtain a second year of data is negligible.

**Table 1: List of Respondent Consultations for the AD Facility Data Collection**

<b>Contact Person, Organization</b>	<b>Role</b>	<b>Email Address</b>
Chanel Kirkpatrick, Chief Operator, Santa Rita Wastewater Reclamation Plant	WRRF AD Operator	Chanel.Kirkpatrick@durangogov.org
Josh Rapport, VP of Research and Development, CleanWorld	AD Vendor/Consultant	josh.rapport@cleanworld.com
John Van Nelson, Technical Services Manager, MillerCoors	Stand-alone AD Operator	John.VanNelson@millercoors.com

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

The electronic surveys used to collect the AD facility data will be distributed to potential respondents annually. EPA believes that any reduction in the frequency of this information collection would impede efforts to track changes in the AD facility universe, processing capacity, amount food waste processed, and biogas production over time. This information is needed to focus the efforts of EPA’s SFM Program to decrease landfilling of wasted food.

**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. Respondents are not required to reveal confidential business information.

**3(g) Sensitive Questions**

No questions of a sensitive nature are asked as part of this collection.

#### 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

##### 4(a) Respondent NAICS Codes

This ICR will include three different types of respondents involved in developing and operating anaerobic digesters: project developers (including engineering firms and environmental consultants), project owners and plant operators; and livestock farmers.

Table 4 identifies the applicable North American Industry Classification System (NAICS) codes for project developers and project owners/plant operators. The NAICS codes are further described using the Standard Occupational Classification (SOC) code and a description for each code. The SOC code will be used to determine the applicable labor rate for each type of respondent in these categories.

Although there are specific NAICS codes for the cattle, dairy and swine farming industry, the Bureau of Labor Statistics (BLS) does not publish labor rates by SOC code within these specific NAICS codes. BLS adheres to a threshold of reliability before publishing more detailed data within the NAICS structure. For the farming sector there is not enough available data to meet this threshold. As a result, appropriate SOC codes from within the overall farming sector (Sector 11 – Agriculture, Forestry, Fishing and Hunting) have been selected for applicable labor rates.

**Table 4: Respondents to Information Collection**

Respondent Type	NAICS Code	Standard Occupational Classification (SOC) code and description
Project Developers	541330	SOC code 17-2081: Environmental Engineers - Research, design, plan, or perform engineering duties in the prevention, control, and remediation of environmental hazards using various engineering disciplines. Work may include waste treatment, site remediation, or pollution control technology.
Project Owners or Plant Operators	221300	SOC Code 51-8031: Water and Wastewater Treatment Plant and System Operators - Operate or control an entire process or system of machines, often through the use of control boards, to transfer or treat water or wastewater.
	541330	SOC code 17-2081: Environmental Engineers - Research, design, plan, or perform engineering duties in the prevention, control, and remediation of environmental hazards using various engineering disciplines. Work may include waste treatment, site remediation, or pollution control technology.
Livestock Farmers	N/A	Sector 11 - Agriculture, Forestry, Fishing and Hunting. SOC code 45-2091: Agricultural Equipment Operators

Table 5 below provides example respondents under each respondent type, the applicable

NAICS codes where appropriate, and the number of potential respondents for the program covered by this ICR. This table shows the number of potential respondents for each NAICS or sector.

**Table 5: Number of Potential Respondents**

<b>Respondent Type</b>	<b>NAICS Code</b>	<b>Example Respondent(s)</b>	<b>Number of potential respondents</b>
Project Developers	541330	Engineering firms, biogas vendors, construction companies, environmental consultants and system developers	20
Project Owners or Plant Operators	221300	Water and Wastewater Treatment Plant and System Operator	100
	541330	AD facility operator, consulting firms/vendors (owner)	60
Livestock Farmers	N/A	On-farm AD operators	50
<b>TOTAL (Year 1)<sup>2</sup></b>			<b>230</b>
<b>TOTAL (Year 2)</b>			<b>253</b>
<b>TOTAL (Year 3)</b>			<b>278</b>
<b>Average Annual Respondents</b>			<b>254</b>

<sup>2</sup> 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.



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

##### **(i) Data Items, Including Recordkeeping Requirements**

Information will be collected annually for EPA's AD facility data collection. Electronic surveys specific to digester type will be used to collect information and track updates. As stated above in Section 1(b), data collected on anaerobic digesters for EPA's AD facility data collection is intended to provide information on the capacity for recycling of food-based materials and the growth of this capacity over time. Respondents will be requested to provide data via 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, source and volume processed;
- Digester characteristics and capacity; and
- Information on tipping fees, pre-processing/de-packaging activities, operational specifications, gas cleaning systems, and the end-use of AD products.

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 products. Initially, the SFM program compiled preliminary AD facility data based on publicly available information. This original dataset has been supplemented with information collected during the first year of annual data collection (2017) under this ICR.

This data on AD facilities will be collected annually for specific operational timeframes. Data collected in 2017 covers the operating year 2015. Data currently being collected (2018) covers operating year 2016.

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 the following information:

For first time data submittals Respondents will:

- complete the electronic survey for their specific digester type (provided by EPA); and
- maintain a filed copy of the information submitted electronically (optional).

To provide annual updates to the AD facility dataset Respondents will:

- provide updated information, if applicable, on the projects under the respondents'

- purview by completing an electronic survey (provided by EPA); 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 AD facility dataset, 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 AD facility dataset (annually);
- Prepare a Report of Findings using the data collected; and
- Post a Report of Findings on EPA's 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. Respondent is 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 aggregated prior to release of the data so that data from any one individual facility cannot be ascertained. Information on capacity, quantities processed and tipping fees for individual facilities will be managed as confidential business information.

In addition, to protect personally identifiable information, EPA will not disclose the exact address of any facility or information that could be used to identify any individual responding to this survey. To allow interested parties to identify the general location of AD facilities in the United States, the name of the facility, state, city, facility type and operational status will be shared on EPA's website in the Report of Findings.

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

Many of the project owners are municipalities or cities and the project operators are employees of municipalities or cities. Both municipalities and cities 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 project developers and livestock farms may be considered small entities.

In particular, engineering firms, biogas vendors, construction companies, environmental consultants and system developers could all 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 \$60, 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 electronic surveys 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 AD facility data collection via electronic surveys. Data input by the respondents will be automatically transmitted to EPA in spreadsheet form.

## **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. These stakeholders provided feedback on the survey revisions incorporated in to this ICR renewal. Cost and burden estimates have been re-evaluated to account for minor revisions to the questions included in the three surveys. Some questions have been revised for clarity and some questions have been eliminated. Respondents that have provided data for previous survey years will be able to indicate that certain data points have not changed (e.g., types of feedstocks processed, sources of feedstocks) and skip these questions decreasing the overall time it takes to complete the survey. Additionally, the questions regarding tipping fees have been streamlined, further decreasing survey time burden.

For the collection year 2019, two years of data (2017 and 2018) will be collected for five key data points:

- Number of months the AD facility operated;
- Amount of solid and liquid food waste processed;
- Amount of solid and liquid non-food waste processed;

- How much revenue was generated from tipping fees (response optional); and
- Amount of biogas produced.

The respondents that were consulted indicated that the survey takes between 10 and 30 minutes. It was the opinion of all those consulted that it would not take additional time to obtain two years' worth of data for the five key data points because all facility data is kept in databases and or files in a central location. If data is being pulled for one year, it would take a negligible amount of time to report two years' worth of data.

A more accurate count of the number of respondents based on the first year of data collection (2017) was also considered for this ICR renewal. The total hourly burden estimates for the program (for the entire 3-year ICR period) are summarized in Table 7 below.

**Table 7: Total Burden Hours for SFM AD Data Collection (3 Year Period)**

<b>Respondent Type</b>	<b>NAICS Code</b>	<b>Total Burden (hours) for 3-year ICR period (June 2019 – July 2022)</b>
Project Developers	541330	34
Project Owners or Plant Operators	221300	166
	541330	100
Livestock Farmers	N/A <sup>3</sup>	83
<b>TOTAL</b>		<b>382</b>
<b>Average Annual Burden Hours</b>		<b>127</b>

The burden hours listed in the table above are based on the following assumption: each annual AD facility data collection requires 30 minutes (or less). 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**

<sup>3</sup> Sector 11 - Agriculture, Forestry, Fishing and Hunting. SOC code 45-2091: Agricultural Equipment Operators

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. Since there are no SOC codes associated with the Livestock Farming NAICS codes, we are using the SOC codes for the appropriate agricultural sector (Sector 11 - Agriculture, Forestry, Fishing and Hunting - SOC code 45-2091: Agricultural Equipment Operators). 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 2017 National Industry-Specific Occupational Employment and Wage Estimates (see: <http://www.bls.gov/oes/current/oesrsci.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**

<b>Respondent Type</b>	<b>NAICS Code</b>	<b>SOC code</b>	<b>May 2017 Mean Hourly Wage (\$)</b>	<b>May 2017 Mean Hourly Wage (\$) (+110% overhead)</b>
Project Developers	541330	SOC code 17-2081: Environmental Engineers	45.68	95.93
Project Owners and Plant Operators	221300	SOC Code 51-8031: Water and Wastewater Treatment Plant and System Operators	21.26	44.65
	541330	SOC code 17-2081: Environmental Engineers	45.68	95.93
Livestock Farmers	N/A (Using Sector 11 – Agriculture, Forestry, Fishing and Hunting)	SOC code 45-2091: Agricultural Equipment Operators	15.12	31.75

**(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 labor rates that include overhead as shown in Table 8 and the total burden hours in Table 7.

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

<b>Respondent Type</b>	<b>NAICS Code</b>	<b>Total Burden Cost (\$) for 3-year ICR period (June 2019 – July 2022)</b>
Project Developers	541330	3,214
Project Owners or Plant Operators	221300	7,389
	541330	9,545
Livestock Farmers	N/A <sup>4</sup>	2,635
<b>TOTAL</b>		<b>22,783</b>
<b>Average Annual Burden Cost</b>		<b>7,594</b>

The total cost for the entire 3-year ICR period is \$22,783. 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**

The 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: 2 hours per update (updates are annual; 2 hours 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)
- Use information collected to enhance the existing AD facility dataset (annually)  
Technical: 40 hours (updates are annual; 40 hours per year)
- Prepare a Report of Findings using the data collected  
Technical: 120 hours (Technical Report will be produced annually; 8 hours per year)
- Review Report of Findings  
Managerial: 8 hours
- Post AD facility data collection data on the EPA website  
Technical: 8 hours per update (updates are annual; 8 hours per year)

<sup>4</sup> Sector 11 - Agriculture, Forestry, Fishing and Hunting. SOC code 45-2091: Agricultural Equipment Operators

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 period covered by this ICR. The totals are rounded to the nearest hour. To obtain an hourly burden estimate for the entire ICR period, annual time estimates for each relevant labor category as described above were multiplied by three because all activities will be conducted annually. 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 2018 - GS” from the Department of Personnel Management (see: [http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf)). For purposes of this ICR, EPA assigned staff the following government service levels: (1) Managerial Staff GS-15, Step 1; (2) Technical Staff - GS-12, Step 5; and (3) Clerical Staff - GS-5, Step 1. The corresponding salary rates are \$50.37 for managerial staff, \$34.54 for technical staff and \$13.87 for clerical staff. When the 60% overhead is included the corresponding rates are \$80.59 for managerial staff, \$55.26 for technical staff and \$22.19 for clerical staff.

**Table 9a: Total Agency Burden Hours**

Labor Category	Total Agency Burden (hours): June 2019 – July 2022
Managerial (GS 15, step 1)	24
Technical (GS-12, step 5)	624
Clerical (GS-5, step 1)	6
<b>TOTAL</b>	<b>654</b>
<b>Average Annual Burden Hours</b>	<b>218</b>

**Table 9b: Total Agency Cost**

<b>Labor Category</b>	<b>Total Agency Cost (\$): June 2019 – July 2022</b>	<b>Total Agency Cost + 60% Overhead (\$): June 2019 – July 2022</b>
Managerial (GS-15, step 1)	1,209	1,934
Technical (GS-12, step 5)	21,553	34,485
Clerical (GS-5, step 1)	83	133
<b>TOTAL (\$)</b>	<b>22,845</b>	<b>36,552</b>
<b>Average Annual Costs</b>	<b>7,615</b>	<b>12,184</b>

Table 9b presents the total cost to the Agency as described in Section 5(a). The total agency burden for the relevant ICR period is 654 hours and the total cost is \$36,552.

#### **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 (See Table 5). Tables 10a and 10b present a summary of the respondent and Agency burden 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)**

	<b>Total Hours: June 2019 – July 2022</b>
AGENCY BURDEN	654
RESPONDENT BURDEN	382
<b>TOTAL BURDEN</b>	<b>1,036</b>
<b>ANNUAL BURDEN</b>	<b>345</b>

**Table 10b: Total Costs (3 Year Period)**



	<b>Total Cost (\$): June 2019 – July 2022</b>
AGENCY COST	36,552
RESPONDENT COST	22,783
O&M/Capital Costs	0
<b>TOTAL COST (\$)</b>	59,335
<b>ANNUAL COST (\$)</b>	19,778

**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 382 hours and \$22,783. There are no O&M or capital costs. EPA estimates the total Agency burden to be 654 hours and \$36,552. The annual respondent burden and cost, averaged over the three-year period, is 127 hours and \$7,594, respectively. There are no O&M or capital costs. The annual Agency burden and cost, averaged over the three-year period, is 218 hours and \$12,184. The total estimated burden and cost is 345 hours and \$19,778 per year.

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

The overall burden has not changed significantly from the original ICR. For this renewal, some survey questions have been revised for clarity and approximately ten questions have been eliminated. Respondents that have provided data for previous survey years will be able to indicate that certain data points have not changed (e.g., types of feedstocks processed, sources of feedstocks) and skip these questions decreasing the overall time it takes to complete the survey. Additionally, the questions regarding tipping fees have been streamlined, which decreases the survey time burden. For the first year of this survey, two years data will be collected for five key data points (see Section 6(a) for details). The respondents that were consulted indicated that it would not take additional time to obtain two years' worth of data for the five key data points because all facility data is kept in databases and or files in a central location. If data is being pulled for one year, it would take a negligible amount of time to report two years' worth of data.

**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](http://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](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-RCRA-2015-0836 and OMB Control Number 2050-0217 in any correspondence.

