

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 0976.19
OMB Control No. 2050-0024
“RCRA SUBTITLE C REPORTING INSTRUCTIONS AND FORMS”**

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Office of Resource Conservation and Recovery
United States Environmental Protection Agency
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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 “RCRA Subtitle C Reporting Instructions and Forms,” EPA ICR Number 0976.19, 2050-0024.

1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

This is a request to renew a currently approved ICR of the U.S. Environmental Protection Agency (EPA): “RCRA Subtitle C Reporting Instructions and Forms,” EPA ICR Number 0976.19 (OMB Control Number 2050-0024). The ICR addresses the following requirements:

- **Hazardous Waste Report requirements** of Sections 3002 and 3004 of the Resource Conservation and Recovery Act (RCRA), as amended, which require reporting to EPA or to authorized States at least every two years. The Hazardous Waste Report [EPA Form 8700-13 Form A/B], or comparable State report, is used by generators and treatment, storage, and disposal facilities (TSDFs) to satisfy this requirement.
- **Notification requirements** of Section 3010 of RCRA, as amended; 40 CFR 260.42 (hazardous secondary material activity); 40 CFR Part 262, Subpart K (alternative generator standards for academic laboratories); 40 CFR Part 273, Subpart C (universal waste activity); and 40 CFR Part 279 (used oil activity). EPA Form 8700-12 is used by facilities to satisfy this requirement.
- **Permit application requirements** of Sections 3004 and 3005 of RCRA, as amended, which require anyone who owns or operates a facility where hazardous waste is treated, stored, or disposed to have a RCRA hazardous waste permit issued by EPA. There are two parts to a RCRA hazardous waste permit application: Part A and Part B. Part A consists of EPA Form 8700-23, or comparable State form, along with maps, drawings, and photographs, as required by 40 CFR 270.13. Part B contains detailed, site-specific information. There is no form for the Part B Permit Application; rather, the Part B Permit Application must be submitted in narrative form and contain the information described in applicable sections of 40 CFR 270.14 through 270.27. This ICR addresses the information collection requirements associated with completing and submitting a Part A Permit Application, or modifying a hazardous waste permit by submitting a revised application. The information collection requirements associated with the Part B Permit Application are covered under a separate ICR.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED AND AUTHORITY FOR THE COLLECTION

(1) Hazardous Waste Report

RCRA Sections 3002 and 3004 authorize the Hazardous Waste Report. Both sections require EPA to establish standards for recordkeeping and reporting of hazardous waste. Section 3002 applies to hazardous waste generators and Section 3004 applies to hazardous waste TSDFs. The implementing regulations are found at 40 CFR 262.40(b) and (d); 262.41(a)(1)-(5), (a)(8), and (b); 264.75(a)-(e) and (j); 265.75(a)-(e) and (j); and 270.30(l)(9). This is mandatory reporting by the respondents.

Section 3002(a)(6) requires submission of reports to EPA or the States at least every two years on the: (1) quantities and nature of hazardous wastes that have been generated during the year and (2) disposition of these hazardous wastes.

Section 3004(a) requires EPA to issue regulations establishing performance standards applicable to owners and operators of facilities for the treatment, storage, or disposal of hazardous waste that include reporting and maintaining records of all hazardous wastes treated, stored, or disposed and the manner in which such wastes were treated, stored, or disposed.

There are a number of uses of the Hazardous Waste Report data. EPA uses these data for planning and developing regulations. In addition, Hazardous Waste Report data allow the Agency to determine whether its regulations are having the desired effect on the generation and management of hazardous waste. For example, Hazardous Waste Report data provide information on whether wastes have shifted from one method of disposal to another. Some State uses of Hazardous Waste Report data include: support of planning, fee assessment, compliance monitoring, and enforcement.

(2) Notification of Regulated Waste Activity

Section 3010 of Subtitle C of RCRA, as amended, requires any person who generates, transports, or recycles regulated wastes or who owns or operates a facility for the treatment, storage, or disposal of regulated wastes to notify EPA of their activities, including the location and general description of the activities and the regulated wastes handled. As required by statute, EPA promulgated regulations to implement these notification requirements at 40 CFR Parts 262, 263, 264, 265, 266, 270, 273, and 279. EPA needs this information to determine the universe of persons who generate, handle, and manage these regulated wastes; assign EPA Identification Numbers; and ensure that these regulated wastes are managed in a way that protects human health and the environment, as required by RCRA, as amended.

(3) Part A Hazardous Waste Permit Application and Modification

EPA promulgated regulations at 40 CFR 270.1 requiring owners or operators of TSDFs to submit a Part A Permit Application. EPA needs information contained in the Part A Permit Application to identify the person(s) legally responsible for hazardous waste activity, to determine which facilities require permits under more than one program, to assess potential for the facility to pollute nearby ground and surface waters, to identify the time frame available for EPA to process permit applications, and to define the specific wastes a facility is legally allowed to handle for different purposes.

EPA promulgated regulations at 40 CFR 270.72 outlining changes that require owners or operators to submit revised Part A Permit Applications. Section 270.72(a)(1)-(3) requires owner/operators to submit both a revised Part A Permit Application and a written justification for changes in the design capacity of processes used at the facility, and/or changes or additions in a facility's hazardous waste treatment, storage, or disposal processes. Under Section 270.72(a)(4), if an owner or operator changes ownership, or operational control of a facility, the new owner or operator is required to submit a revised Part A Permit Application, and a Subpart H compliance demonstration. EPA needs revised permit applications, justifications, and compliance demonstrations to determine whether desired changes are acceptable or should be more closely reviewed as part of a full permit issuance process.

2(b) PRACTICAL UTILITY AND USERS OF THE DATA

(1) Hazardous Waste Report

Implementation of the RCRA program requires the collection of information on the characteristics of the regulated community generally (e.g., number of generators and TSDFs), as well as the specific characteristics of individual sites (e.g., waste handling activities undertaken). This information is used for waste activity monitoring, compliance monitoring, technical assistance, program planning, waste minimization, and other program activities taken by EPA and the States. The information also is used by public interest groups (such as the Right-to-Know Network) and industry.

The Hazardous Waste Report also provides information to States for tracking shipments of waste. Many States do not collect or track manifests, which provide information on off-site shipments of hazardous waste; therefore, the Hazardous Waste Report serves as the only source of this information.

Since 1991, EPA compiles and publishes the *National Biennial RCRA Hazardous Waste Report* based on the data for each odd number reporting year. EPA and the States have many uses for Hazardous Waste Report information, including:

- Describing the various source activities that generate hazardous waste and the generated waste types and quantities.
- Describing the management methods by which the waste is treated, disposed, or recycled and the quantities managed by each method.
- Providing information for analysis of trends in waste generation, waste treatment and disposal, recycling, and source reduction.
- Understanding how much waste a State receives from out of State or sends out of State.
- Estimating available capacity for treating, recycling, and disposing hazardous wastes.

Additionally, EPA utilizes the Hazardous Waste Report information for planning and developing regulations; regulation development depends on descriptions and quantities of generated hazardous waste and management methods used for treatment, recycling, and disposal. The information allows the Agency to determine whether regulations are having the desired effect on the generation and management of hazardous waste; for example, the report provides information on whether the treatment of wastes has shifted from one method to another. EPA also uses the information for conducting technical assistance, planning facility inspections, and carrying out regulatory enforcement. States use the information for many of the same purposes as EPA; other State uses include planning, setting waste minimization goals, assessing fees, monitoring compliance, and carrying out enforcement.

EPA and States receive requests for the information from many public and private organizations, including government agencies, businesses, public interest groups, and interested citizens. Many requests come from businesses that supply chemicals, equipment, and services to hazardous waste generators and TSDFs.

(2) Notification of Regulated Waste Activity

EPA enters notification information submitted by respondents into an EPA national data system and assigns EPA Identification Numbers. EPA uses the information primarily for tracking purposes, and secondarily for a variety of enforcement and inspection purposes. In addition, EPA uses this information to identify the universe of regulated waste generators, handlers, and managers and their specific regulated waste activities. Finally, EPA uses this information to ensure that regulated waste is managed properly, that statutory provisions are upheld, and that regulations are adhered to by facility owners or operators.

(3) Part A Hazardous Waste Permit Application and Modification

EPA uses information in the Part A Permit Application to define which processes can be used and which wastes can be handled at newly regulated facilities subject to permitting requirements for the first time and permitted facilities with newly regulated units. This includes defining allowable changes in facility operations and applies to new facilities not yet constructed; newly regulated facilities subject to RCRA permitting requirements for the first time; permitted facilities with newly regulated units; and interim status facilities. EPA uses information in the Part A Permit Application to:

- Set priorities for processing permit applications;
- Respond to requests from hazardous waste generators for the names and locations of facilities where they can send their waste for storage, treatment, or disposal;
- Respond to public and Congressional inquiries regarding particular hazardous waste management facilities; and
- Ensure that facilities are operating in a manner protective of human health and the

environment.

EPA uses information from revised Part A Permit Applications and associated justifications and Subpart H compliance demonstrations to determine whether desired changes are acceptable under interim status or whether the change should be more closely reviewed as part of a full permit issuance process. In addition, modifying the Part A Permit Application allows inspectors to have up-to-date information on major aspects of the facility, including the size of the operation, the hazardous wastes handled, and the types of processes used. Without this documentation, EPA would be unable to determine the owner or operator's compliance with the management standards of 40 CFR Parts 264 or 265 or the rules governing changes during interim status. This documentation also is useful for both EPA and the owner or operator in an enforcement action.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) NONDUPLICATION

The information collected under this ICR is not available from any source other than respondents. EPA's Office of Resource Conservation and Recovery (ORCR) is the only office within the Agency requiring the recordkeeping or reporting of this information. No other Federal agency or department collects this information.

The RCRA site identification information is collected on one common form—the Site ID Form—for the Hazardous Waste Report, the Notification of Regulated Waste Activity, and the RCRA Hazardous Waste Part A Permit Application. A respondent may submit a copy of a previously reported Site ID Form and note any changes; this verifies and updates the site identification information.

3(b) PUBLIC NOTICE

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on October 7, 2019 (84 *FR* 53437). The notice indicated that EPA was planning to submit an ICR, "RCRA Subtitle C Reporting Instructions and Forms" (EPA ICR No. 0976.19, OMB Control No. 2050-0024), to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act. The notice also requested comments on the information collection and burden estimates covered in the ICR. The public comment period extended through December 6, 2019. EPA received no comments on this ICR in response to the *Federal Register* notice.

3(c) CONSULTATIONS

Table 1
Organizations EPA Contacted during the Development of this ICR

Organization	Contact Name	Phone Number
Industry		
Hanna Steel Corp.	Thomas Lenoir	205-820-5253
Safety Kleen	Jeff Curtis	561-523-4719
Costco Wholesale	Rose Thompson	425-313-6674
Rockline Industries	Cynthia Totton	479-675-1302
Great Lakes Chemical Plant	Adriane Rogers	870-310-7741
Millcreek Metal Finishers	Adam Fiscus	814-833-9045
State		
Massachusetts	Michael Hurley	617-292-5633
Alabama	Adrian Corbitt	334-271-4163
Missouri	David Green	573-3204

The Industry consultants were asked to review the burden estimates on gathering information, completing and submitting the three forms covered by this ICR. The State consultants were asked to review the burden estimates on collecting, reviewing, and uploading the information on the three forms. Based on the consultation information, the burden estimates for this renewal have remained the same.

3(d) EFFECTS OF LESS FREQUENT COLLECTION

EPA has carefully considered the information collection burden imposed by the information collection requirements covered in this ICR. 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. A number of the required activities, for example, will be performed once (e.g., one-time notifications). EPA believes strongly that, if the minimum information collection requirements are not met, EPA will not be able to ensure that hazardous waste and hazardous secondary material is being properly managed and do not pose a threat to human health and the environment.

(1) Hazardous Waste Report

For the Hazardous Waste Report, the two-year cycle is statutorily required. Although some States collect information on an annual or quarterly basis, EPA does not require more frequent data collection.

(2) Notification of Regulated Waste Activity

New hazardous waste generators, transporters, or TSDFs must submit EPA Form 8700-12 (i.e., the Site ID Form) and obtain an EPA Identification Number prior to treating (including recycling), storing, transporting, offering for transport, or disposing of hazardous waste. Existing hazardous waste generators, transporters, or TSDFs are required to notify the Agency of their hazardous waste activity(ies) not later than 90 days after the promulgation or revision of regulations in 40 CFR Part 261 (identification and listing of hazardous wastes). Owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities. Under Section 273.32(a), large quantity handlers of universal waste must submit a written, one-time notification of universal waste management to the Regional Administrator and obtain an EPA Identification Number before meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3). Under sections 279.42, 279.51, 279.62 and 279.73, used oil handlers who have not previously complied with the notification requirement (under 40 CFR Part 266, Subpart E) must submit a written, one-time notification of used oil management activities and obtain an EPA Identification Number. Any reduction in the frequency of this information collection would prevent the Agency from meeting the statutory requirements of RCRA Section 3010.

(3) Part A Hazardous Waste Permit Application and Modification

A respondent's provision of information on a Part A Permit Application is essentially a one-time exercise that must occur when a facility is new or if an existing facility becomes subject to new permitting requirements. Subsequent revisions to the Part A Permit Application are necessary only if an interim status facility changes its ownership and/or process or management of wastes. EPA strongly believes that if the minimum requirements specified under the regulations are not met, neither the facilities nor EPA can ensure that hazardous wastes are being properly managed, and do not pose a serious threat to 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, applicable OMB guidance, and EPA's ICR Handbook. In addition, this information collection complies with EPA's Data Standards and Information Quality Guidelines.

3(f) CONFIDENTIALITY

(1) Hazardous Waste Report

The Hazardous Waste Report requires businesses to provide information on various aspects of hazardous waste generation and management. Some businesses consider some of their hazardous waste information to be Confidential Business Information (CBI). A business may, if it desires, protect its Hazardous Waste Report information from public disclosure by asserting a claim of confidentiality covering all or part of its information. If a confidentiality claim were asserted, EPA will treat the information in accordance with the confidentiality regulations at 40 CFR Part 2, Subpart B. EPA also will ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

(2) Notification of Regulated Waste Activity

The Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the information submitted as part of their notifications. However, if a confidentiality claim were asserted, EPA will treat the information in accordance with the confidentiality regulations at 40 CFR Part 2, Subpart B. EPA also will ensure that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

(3) Part A Hazardous Waste Permit Application and Modification

All information submitted in a Part A Permit Application or revision will be subject to public disclosure, without notice to the facility, in accordance with the Freedom of Information Act (5 U.S.C. Section 552) and EPA Freedom of Information Regulations at 40 CFR Part 2. Because of the general nature of the information requested, only a few Part A Permit Applications to date have qualified for exemption to disclosure under the business confidentiality exception. Claims of confidentiality must be clearly indicated on the forms and attachments, and must be accompanied, at the time of filing, by a written substantiation of the claim in accordance with 40 CFR Part 2, Subpart B (particularly the information described at 40 CFR 2.204(e)). Information that is determined to be confidential is placed in a secured "confidential file" for future use. Only persons with special clearance for confidential information have access to these files.

3(g) SENSITIVE QUESTIONS

No questions of a sensitive nature are included in any of the information collection requirements covered in this ICR.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) RESPONDENTS AND NAICS CODES

The following is a list of North American Industry Classification System (NAICS) codes associated with industries most likely affected by the information collection requirements covered in this ICR.

NAICS Code Description	NAICS Code
Agriculture, Forestry, Fishing, and Hunting	11
Mining	21
Utilities	22
Construction	23
Manufacturing	31-33
Wholesale Trade	42
Retail Trade	44-45
Transportation and Warehousing	48-49
Information	51
Finance and Insurance	52
Real Estate, Rental, Leasing	53
Professional, Scientific, and Technical Services	54
Management of Companies and Enterprises	55
Administrative Support, Waste Management, and Remediation	56
Educational Services	61
Health Care and Social Assistance	62
Arts, Entertainment, Recreation	71
Accommodation and Food Services	72
Other Services	81
Public Administration	92

4(b) INFORMATION REQUESTED

(1) Hazardous Waste Report

The Hazardous Waste Report consists of four forms: RCRA Subtitle Site Identification Form (Site ID Form), Waste Generation and Management (Form GM), Waste Received from Off-Site (Form WR), and Off-Site Identification (Form OI; used only by States). Only LQGs and TSDFs are required to complete the Hazardous Waste Report.

As with most of the RCRA program, the Hazardous Waste Report data collection process is delegated to the States. States provide respondents with either the Federal form or a State equivalent, collect the responses, contact non-respondents, enter the data (or load files if the State employs electronic methods for preparation and submittal of reports by regulated entities) into RCRAInfo using off-the-shelf software packages which have been developed to support the collection of Hazardous Waste Report data, assure data quality, and forward the data to EPA.

States have discretion on the methods used to identify entities to whom they distribute forms and the subsequent tracking of reports received. Most States generate mailing lists based on previous report submittals, augmented by recent notifications of regulated activity. Many States levy fees based on the nature and extent of regulated activity identified in the report. EPA makes all reported data (except any that may be claimed as CBI) available to the public on the Internet. This provides further incentive for sites (and also for States and EPA) to ensure the information is complete and accurate because the public regularly accesses this information.

(i) Data Items:

- **Site ID Form - RCRA Subtitle C Site Identification Form.** The Site ID Form must be submitted by all sites required to file the Hazardous Waste Report. This form collects information such as site name, EPA Identification Number, address, contact, and type of hazardous waste generation and management activities taking place at the site; it verifies their information, especially the site's generator status as the date of submission of the report. It requires a certification signature for the submission of the report.
- **Form GM - Waste Generation and Management.** Form GM must be submitted by all respondents that generated or shipped large quantity generator amounts of RCRA hazardous waste during the reporting year. This form collects information on each generated waste, including a narrative waste description, a waste characterization (waste codes, source, and form), quantity generated, and the method of waste management (whether managed on-site or shipped off-site).

- **Form WR - Waste Received From Off-Site.** Form WR must be submitted by all sites that received RCRA hazardous waste from off-site during the reporting year. This form collects information on each waste received from off-site, including a narrative description of the waste, a brief waste characterization (e.g., waste codes), the EPA Identification Number of the off-site generator, the quantity of waste received, and the method of waste management.
- **Form OI - Off-Site Identification.** Form OI is not required by EPA; rather, it is provided as an option for States to collect the names and addresses of transporters, generators that ship waste, and receivers of waste reported on Forms GM and WR where only the EPA Identification Number is listed.

(ii) Respondent Activities:

Facilities (i.e., LQGs and TSDFs) must perform the following activities, as applicable:

- Read the Hazardous Waste Report instructions.
- Gather information and complete Site ID Form.
- Gather information and complete Form GM.
- Gather information and complete Form WR.
- Gather information and complete Form OI if required by the State (State-optional form, not a Federal form).
- Submit the report to the State (or EPA Regional Office for some States and Territories).
- Maintain a copy of each form for three years.

State agencies must perform the following activities:

- Distribute Hazardous Waste Report forms and instructions.
- Assist respondents.
- Key entry of report submissions.
- Perform quality assurance.

(2) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

40 CFR 260.42(a) provides that hazardous secondary material generators, tolling contractors, toll manufacturers, reclaimers, and intermediate facilities managing hazardous secondary materials which are excluded from regulation under section 261.2(a)(2)(ii) or section 261.4(a)(23), (24), or (25) must send a notification prior to operating under the exclusion(s) and by March 1 of each even numbered year thereafter to the Regional Administrator using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) that includes the specified information at section 260.42(a)(1)-(10).

Section 260.42(b) provides that, if a hazardous secondary material generator, tolling contractor, toll manufacturer, reclaimer or intermediate facility has submitted a notification, but then subsequently stops managing hazardous secondary materials in accordance with the exclusion(s), the facility must notify the Regional Administrator within thirty (30) days using EPA Form 8700-12. For purposes of this section, a facility has stopped managing hazardous secondary materials if the facility no longer generates, manages and/or reclaims hazardous secondary materials under the exclusion(s) and does not expect to manage any amount of hazardous secondary materials for at least one year

(i) Data Items:

- Notification using EPA Form 8700-12, which includes the following information:
 - 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 exclusion under which the hazardous secondary materials will be managed (e.g., section 261.2(a)(2)(ii), section 261.4(a)(23), (24), and/or (25));
 - For reclaimers and intermediate facilities managing hazardous secondary materials in accordance with section 261.4(a)(24) or (25), whether the reclaimer or intermediate facility has financial assurance (not applicable for persons managing hazardous secondary materials generated and reclaimed under the control of the generator);
 - When the facility expects to begin managing the hazardous secondary materials in accordance with the exclusion;
 - A list of hazardous secondary materials that will be managed according to the exclusion (reported as the EPA hazardous waste numbers that would apply if the hazardous secondary materials were managed as hazardous wastes);
 - For each hazardous secondary material, whether the hazardous secondary material, or any portion thereof, will be managed in a land-based unit;
 - The quantity of each hazardous secondary material to be managed

- annually; and
- The certification (included in EPA Form 8700-12) signed and dated by an authorized representative of the facility.

(ii) Respondent Activities:

Facilities must perform the following activities, as applicable:

- Complete and submit EPA Form 8700-12 prior to operating under exclusion(s).
- Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter.
- Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion, if applicable.

State agencies must perform the following activities:

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

Facilities that generate, transport, recycle, treat, store, or dispose of hazardous waste as defined by 40 CFR Part 261 must notify EPA of their hazardous waste activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Parts 262, 263, 264, 265, 266, 270, and 273. In order to comply with these requirements, facilities must complete and submit the RCRA Subtitle C Site Identification Form (EPA Form 8700-12).

(i) Data Item:

- Notification using EPA Form 8700-12, which includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;

- Information on whether this is the initial notification or a subsequent notification;
- A description of the hazardous wastes handled at the facility; and
- A certification signed by the facility owner, operator, or authorized representative.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Complete and submit EPA Form 8700-12.

State agencies must perform the following activities:

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.
- Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

(c) **Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K**

(c1) *Intent to Comply with Subpart K and Recordkeeping of Agreements*

40 CFR 262.203(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.203(b)(1)-(11).

Section 262.203(c) provides that an eligible academic entity must keep a copy of the notification on file at the eligible academic entity while its laboratories are subject to Subpart K.

Section 262.203(d) provides that a teaching hospital that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the teaching hospital while its laboratories are subject to Subpart K.

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

(i) Data Items:

- Notification, using EPA Form 8700-12, with the following fields filled out, at a minimum:
 - Reason for submittal;
 - Site EPA Identification Number (except for CESQGs);
 - Site name;
 - Site location information;
 - Site land type;
 - North American Industry Classification System (NAICS) code(s) for the site;
 - Site mailing address;
 - Site contact person;
 - Operator and legal owner of the site;
 - Type of regulated waste activity; and
 - Certification.
- A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(d).
- A copy of the formal written affiliation agreement with a college or university, as specified under section 262.203(e).

(ii) Respondent Activities:

Facilities must perform the following activities, as applicable:

- Eligible academic entities electing to be subject to the requirements of Subpart K must perform the following:
 - Complete and submit EPA Form 8700-12; and
 - Keep a copy of the notification on file.
- Teaching hospitals that are not owned by a college or university must:
 - Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K.
- Non-profit research institutes that are not owned by a college or university must:
 - Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

State agencies must perform the following activities:

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

(c2) *Withdrawal from 40 CFR Part 262, Subpart K*

40 CFR 262.204(a) provides that an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify that it is withdrawing from the requirements of Subpart K for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K.

When submitting the Site ID Form, the eligible academic entity must, at a minimum, fill out the fields on the form that are specified at section 262.204(b)(1)-(11).

Section 262.204(c) provides that an eligible academic entity must keep a copy of the withdrawal notice on file at the eligible academic entity for three years from the date of the notification.

(i) Data Items:

- A Site ID Form with the following fields filled out, at a minimum:
 - Reason for submittal;
 - Site EPA Identification Number (except for CESQGs);
 - Site name;
 - Site location information;
 - Site land type;
 - North American Industry Classification System (NAICS) code(s) for the site;
 - Site mailing address;
 - Site contact person;
 - Operator and legal owner of the site;
 - Type of regulated waste activity; and
 - Certification.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Complete and submit EPA Form 8700-12.
- Keep a copy of the withdrawal notice on file.

State agencies must perform the following activities:

- Review completed EPA Form 8700-12.
- Enter EPA Form 8700-12 information into RCRAInfo.

(d) **Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C**

Large quantity handlers of universal waste must notify EPA of their universal waste activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 273, Subpart C. In order to comply with these requirements, large quantity handlers of universal waste must complete and submit the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), or complete and submit a letter to EPA requesting an EPA Identification Number.

(i) Data Items:

- Notification (EPA Form 8700-12) that includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;
 - Information on whether this is the initial notification or a subsequent notification;
 - A description of the hazardous wastes handled at the facility; and
 - A certification signed by the facility owner, operator, or authorized representative.

Or

- A letter that includes:
 - The universal waste handler's name and mailing address;
 - Name and business telephone number of the person who should be contacted regarding the universal waste management activities;
 - Address or physical location of the universal waste management activities;
 - A list of all of the types of universal waste managed by the handler; and
 - A statement indicating that the handler is accumulating more than 5,000 kilograms of universal waste at one time and the types of universal waste (e.g., batteries, pesticides, thermostats) the handler is accumulating above this quantity.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Complete and submit EPA Form 8700-12 or a letter requesting an EPA Identification Number.

State agencies must perform the following activities:

- EPA Form 8700-12
 - Review completed EPA Form 8700-12.
 - Enter EPA Form 8700-12 information into RCRAInfo.
 - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

Or

- Letter
 - Review letter requesting EPA Identification Number.
 - Enter letter information into RCRAInfo.
 - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

(e) **Notification of Used Oil Activity under 40 CFR Part 279**

Used oil handlers must notify EPA of their used oil activities and obtain an EPA Identification Number. These notification requirements are codified at 40 CFR Part 279. In order to comply with these requirements, used oil handlers must complete and submit the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), or complete and submit a letter to EPA requesting an EPA Identification Number.

(i) Data Items:

- Notification using EPA Form 8700-12, which includes the following information:
 - Name of the facility;
 - Facility mailing address;
 - Facility location;
 - Name, title, and business telephone number of the person who should be contacted regarding information on the form;
 - Ownership information, including the legal status of the current owner of the facility;
 - Information on the type of hazardous waste activity;
 - Information on whether this is the initial notification or a subsequent notification;
 - A description of the hazardous wastes handled at the facility; and
 - A certification signed by the facility owner, operator, or authorized representative.

Or

- A letter that includes:
 - Company name;
 - Owner of company;
 - Mailing address of company;
 - Name and telephone number of company contact;
 - Type of used oil management activity(ies);
 - Location of facility(ies) (except for used oil fuel marketers); and
 - Name and telephone number of each contact at each transfer facility, if applicable (for used oil transporters and transfer facilities only).

(ii) Respondent Activities:

Facilities must perform the following activities:

- Complete and submit EPA Form 8700-12 or a letter requesting an EPA Identification Number.

State agencies must perform the following activities:

- EPA Form 8700-12
 - Review completed EPA Form 8700-12.
 - Enter EPA Form 8700-12 information into RCRAInfo.
 - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

Or

- Letter
 - Review letter requesting EPA Identification Number.
 - Enter letter information into RCRAInfo.
 - Generate EPA Identification Number and send EPA Identification Number to facility (if applicable).

(3) Part A Hazardous Waste Permit Application and Modification

(a) Part A Permit Application

(a1) Contents of the Part A Permit Application

40 CFR 270.1 requires owners or operators of newly regulated facilities subject to permitting requirements for the first time and permitted facilities with newly regulated units to prepare and submit a Part A Permit Application (EPA Form 8700-23).

(i) Data Items:

- A list of the activities conducted by the applicant that require the owner or operator to obtain a RCRA permit.
- Name, mailing address, and location, including latitude and longitude of the facility for which the application is submitted.
- Up to four NAICS codes that best reflect the principal products or services provided by the facility.
- Operator's name, address, telephone number, ownership status, and status as Federal, State, private, public or other entity.
- Name, address, and phone number of the owner of the facility.
- Whether the facility is located on Indian lands.
- An indication of whether the facility is new or existing and whether it is a first or revised application.
- For existing facilities, the following information:
 - A scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas and
 - Photographs of the facility clearly delineating all existing structures; existing treatment, storage and disposal areas; and sites of future treatment, storage, and disposal areas;
- A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items.

- A specification of the hazardous wastes listed or designated under 40 CFR Part 261 to be treated, stored, or disposed of at the facility; an estimate of the quantity of such wastes to be treated, stored, or disposed annually; and a general description of the processes to be used for such wastes.
- A listing of all permits or construction approvals received or applied for under any of the following programs:
 - Hazardous Waste Management program under RCRA
 - Underground Injection Control (UIC) Program under the Safe Drinking Water Act (SDWA)
 - National Pollutant Discharge Elimination System (NPDES) program under the Clean Water Act (CWA)
 - Prevention of Significant Deterioration (PSD) program under the Clean Air Act (CAA)
 - Nonattainment program under the CAA
 - National Emission Standards for Hazardous Air Pollutants (NESHAPS) preconstruction approval under the CAA
 - Ocean dumping permits under the Marine Protection Research and Sanctuaries Act
 - Dredge or fill permits under section 404 of the CWA
 - Other relevant environmental permits, including State permits.
- A topographic map (or other map if a topographic map is unavailable) extending one mile beyond the property boundaries of the source, depicting the following aspects of the facility:
 - Each of its intake and discharge structures;
 - Each of its hazardous waste treatment, storage, or disposal facilities;
 - Each well where fluids from the facility are injected underground; and
 - Wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary.
- A brief description of the nature of the business.
- For hazardous debris, a description of the debris category(ies) and containment category(ies) to be treated, stored, or disposed of at the facility.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Read the regulations and instructions.
- Prepare the Site ID Form.

- Prepare the Hazardous Waste Permit Information Form and reports.

(a2) *Signatories to Permit Applications and Permit Application Reports*

40 CFR 270.11(a) requires operators of facilities to obtain the necessary signatures and certifications for the Part A Permit Application, reports, and other information requested by EPA. Additionally, operators must obtain new authorization for authorizations deemed invalid.

(i) Data Items:

- Signatures required on Part A Permit Applications:
 - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
 - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
 - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).
- Signatures for reports required by permits and other information requested by the Director:
 - For a corporation, the signature of a responsible corporate officer as defined at 40 CFR 270.11(a)(1).
 - For a partnership or sole proprietorship, the signature of a general partner or proprietor as defined at 40 CFR 270.11(a)(2).
 - For a municipality, State, Federal, or other public agency, the signature of either a principal executive officer or ranking elected official as defined at 40 CFR 270.11(a)(3).
 - Signature of a duly authorized representative of one of the persons listed above as defined at 40 CFR 270.11(b).
- New authorization satisfying the requirements of 40 CFR 270.11(b) if an authorization under 40 CFR 270.11(b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility. Data items for this requirement are the same as those under 40 CFR 270.11(b).
- Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to be the best of

my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Obtain signatures and certifications for the Part A Permit Application, reports, and other information requested by EPA.
- Obtain a new authorization for invalid authorizations.

(a3) *Submittal of Part A Permit Application*

40 CFR 270.70(b) requires owners and operators who submit a Part A Permit Application to EPA, to explain or cure an alleged deficiency in the Part A Permit Application, if EPA notifies the applicant that the application fails to meet the requirements of 40 CFR 270.13.

(i) Data Items:

- Part A Permit Application and reports.
- Explanation of alleged deficiency in the Part A Permit Application.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Submit the Part A Permit Application and reports.
- Explain or cure an alleged deficiency in the Part A Permit Application, if required.

State agencies must perform the following activities:

- Review information contained in the application.
- Ensure that the Part A Permit Application and associated reports are signed by the appropriate person.
- Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility.
- Review signature certifications.

- Enter information into RCRAInfo.
- Notify applicant of deficiency in the Part A Permit Application.

(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations

Under 40 CFR 270.72, interim status facilities must prepare and submit a revised Part A Permit Application if the Agency promulgates a rulemaking that affects the facility, or if the owner/operator otherwise modifies the facility. Interim status facilities who modify their Part A Permit Application are required to submit a revised Part A Permit Application.

(i) Data Items:

- Part A application using EPA Form 8700-23.

(ii) Respondent Activities:

Facilities must perform the following activities:

- Read the regulations and instructions in preparation for revising a Part A Permit Application in response to an Agency rulemaking or a facility modification.
- Prepare and submit a revised Part A Permit Application in response to an Agency rulemaking or facility modification.
- Prepare and submit justifications for changes, if needed.
- Submit Subpart H compliance demonstrations, if needed.

State agencies must perform the following activities:

- Review information revised Part A Permit Application.
- Enter revised Part A Permit Application information into RCRAInfo.
- Review justifications for changes.
- Review Subpart H compliance demonstrations.

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

5(a) AGENCY ACTIVITIES

(1) Hazardous Waste Report

As discussed in Section 4(b) of this document, the Hazardous Waste Report data collection process is delegated to the States. However, EPA is involved throughout this process. The extent of EPA's involvement depends on the activities performed by the States in the data collection process. The following paragraphs briefly describe EPA's participation in the data collection process.

In some cases, the EPA Region performs all of the State roles. That is, EPA Regions VII and IX, where the Region implements the RCRA hazardous waste program for Iowa and Alaska respectively, provide respondents with the Federal form, collect the responses, contact non-respondents, enter the data into RCRAInfo using off-the-shelf software packages which have been developed to support the collection of Hazardous Waste Report data, assure data quality, and forward the data to EPA Headquarters.

In other cases, the EPA Region provides direct processing support for some, but not all, of the collection activities. For example, the EPA Region may support the State in data gathering and data quality assessment.

In still other cases, the EPA Regions provide additional resources to the States. For example, the EPA Region may provide technical support to States for the transfer of their files to EPA for incorporation into RCRAInfo.

EPA Headquarters produces and distributes the Federal forms and related guidance, defines the data and file format for data, establishes the schedule for submitting data, manages the incorporation of State data into RCRAInfo, coordinates national data quality review, maintains RCRAInfo, and prepares a national report listing major facts about the national picture of hazardous waste generation and management for the reporting year.

EPA activities for the Hazardous Waste Report include the following:

- ***Develop Hazardous Waste Report forms and instructions.***
- ***Distribute Hazardous Waste Report forms and instructions.*** EPA Headquarters distributes the form and instruction booklets to the States and Regions. Regions prepare mailing lists, mail forms and instructions, record receipt of completed forms, and contact sites that fail to respond within the specified time period.
- ***Develop computer capabilities required to compile national data.*** EPA Headquarters develops the computer capabilities required to load data into RCRAInfo, the reports which support data quality assessment and other programmatic use of the data, and preparation of the national report.
- ***Assist respondents.*** EPA Regions and Headquarters provide assistance to respondents. States are, however, the first point of contact for answering respondent questions and assistance, where applicable.

- **Key entry of report submissions.** EPA Regions and the regulated entities, key enter or electronically load the data into RCRAInfo they select and maintain. The data entry function was privatized for the 1999 Hazardous Waste Report process. Many States, Regions, and the regulated community use one of the private vendor's software packages for data entry and recordkeeping. Some reports are entered directly on State or vendor hosted Internet sites and some are submitted on diskettes.
- **Perform quality assurance.** EPA Regions and Headquarters perform data quality assurance. This includes: follow-up to non-respondents, detection and correction of unacceptable responses (e.g., in cases where the respondent misunderstood the instructions); verification of exceptional responses (e.g., data reported by a respondent that differ significantly from data reported by the rest of the respondent universe) and identification of significant response changes between reporting years. The national software supports these activities with a variety of data editing functions.

Once reports are received, the QA/QC procedures include a hierarchy of assessments. First, system procedures ensure the data has fundamental internal consistency (e.g., required data fields are populated and the values are of the correct data type and within allowed ranges).

Second, the information content of the data for individual sites is evaluated to identify any potential over or under reporting (exception reports support identification of extremes and significant variance from one cycle to another).

Third, assessment reports support evaluation of intra-State and inter-State shipments of wastes to identify potential discrepancies between reports submitted by generators and the TSDF's who were identified by the generator as receivers of the waste.

Based on the assessments, EPA Regions identify cases where accuracy may be questionable. For those cases, they generally contact the site to review the information received; and site respondent confirms that the data are correct or that the site intends to submit an amended report to correct discrepancies.

- **Prepare the national report.** EPA Headquarters will prepare *The National Biennial RCRA Hazardous Waste Report* that will be made available to the Congress and the public by December 2020.
- **Store the data.** The Hazardous Waste Reports will be stored by the EPA Regions for three years and may be maintained by each Region. RCRAInfo is maintained by EPA Headquarters.

(2) Notification of Regulated Waste Activity

EPA activities are the same for all of the notification requirements covered in this ICR. These activities include:

- For initial notifications:
 - Reviewing the completed EPA Form 8700-12 or letter requesting an EPA Identification Number, as specified.
 - Entering information into the EPA national data system.
 - Generating an EPA Identification Number and sending the EPA Identification Number to the facility.
- For subsequent notifications:
 - Reviewing the completed EPA Form 8700-12 or letter requesting an EPA Identification Number, as specified.
 - Entering information into the EPA national data system.

(3) Part A Hazardous Waste Permit Application and Modification

EPA activities associated with Part A Permit Applications include the following:

- For Part A Permit Applications:
 - Reviewing information contained in the application.
 - Ensuring that the Part A Permit Application and associated reports are signed by the appropriate person.
 - Reviewing newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility.
 - Reviewing signature certifications.
 - Entering information into RCRAInfo.
 - Notifying applicant of deficiency in the Part A Permit Application.
- For revised Part A Permit Applications, justifications, and compliance demonstrations:
 - Review information revised Part A Permit Application.
 - Enter revised Part A Permit Application information into RCRAInfo.
 - Review justifications for changes.
 - Review Subpart H compliance demonstrations.

5(b) COLLECTION METHODOLOGY AND MANAGEMENT

In collecting and analyzing the information associated with this ICR, EPA and authorized States may use a telephone system, personal computers, and applicable RCRAInfo software. They will ensure the accuracy and completeness of collected information by reviewing the submittals. They will keep records of this information in file cabinets and/or computer systems.

5(c) SMALL ENTITY FLEXIBILITY

(1) Hazardous Waste Report

EPA uses the quantity of waste generated per month to determine the extent to which a firm should be regulated. EPA categorizes generators of less than 1,000 kilograms of non-acute hazardous waste per month as small quantity generators (SQGs) and relieves them of specific requirements.

SQGs are not required to file the Hazardous Waste Report. A SQG who is sent the Hazardous Waste Report booklet due to a change in generator status or error need not respond. They must return a completed RCRA Subtitle C Site Identification Form to update their generator status to ensure they are not subject to follow-up contact for biennial reporting.

(2) Notification of Regulated Waste Activity

Some respondents will be individuals or small organizations. However, EPA believes that the information to be collected is the minimum amount necessary to fulfill the statutory requirements of RCRA.

(3) Part A Hazardous Waste Permit Application and Modification

Interim status is statutorily conferred without regard to facility size. Therefore, EPA believes that requirements regarding Part A submissions and revisions must apply equally to large and small businesses. Although the legal requirements for Part A Permit Application information are the same for large and small businesses, the Agency believes that in practice the small entities will find it easier to provide the required information. In many instances, a small organization will be able to complete or revise the Part A Permit Application in less time than larger organizations because they use fewer processes for the management of hazardous wastes and they manage fewer types of wastes. As a rule of thumb, the complexity of preparing a Part A Permit Application depends upon the complexity of the processes of a hazardous waste facility and the wastes managed at the facility. Therefore, if a small organization operates a complex facility (e.g., a chemical landfill that manages a very large number of waste streams), then the time to complete the Part A Permit Application will necessarily be greater. Again, EPA has taken steps to minimize the burden on all respondents by providing detailed instructions for completion of the Part A Permit Application form and by requiring short answer responses to most of the items of the application.

It also should be noted that the reporting requirements for changes are brief. Therefore, owners or operators can easily comply with these requirements. In addition, most of the revisions to Part A Permit Applications will entail merely checking boxes or filling in numbers to indicate the type of new activity or new waste to be handled at the facility. Any written justification entails a short letter from the owner or operator. EPA, therefore, estimates that the potential burden on small businesses caused by this information collection is minimal.

5(d) COLLECTION SCHEDULE

(1) Hazardous Waste Report

EPA’s 2019 Hazardous Waste Report national implementation schedule is outlined in Table 2.

**Table 2
2019 Hazardous Waste Report National Implementation Schedule**

Activity	Tentative Completion Date
Facilities submit completed forms to Regions/States	March 2020
Regions/States begin loading the data into RCRAInfo	April 2020
Regions/States complete data loads	July 2020
EPA Headquarters publishes Preliminary 2019 National Biennial data summaries	August 2020
Last day to request a State Summary Report from EPA Headquarters	October 2020
Regions/States complete loading corrected (if necessary) data into RCRAInfo	November 2020
EPA Headquarters makes Final 2019 National Biennial data available on RCRAInfo Web (public Web site)	December 2020

(2) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

A claimant must prepare and submit a notification to EPA prior to operating under the exclusion(s). In addition, the claimant must update and submit notification to EPA by March 1 of each even numbered year thereafter. A claimant that submitted a notification but then subsequently stops managing hazardous secondary materials in accordance with the exclusion(s) must submit notification to EPA within 30 days.

(b) Notification of Hazardous Waste Activity under RCRA Section 3010

Under sections 262.12, 263.11, 264.11 and 265.11, all new hazardous waste generators, transporters, and TSDFs must notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Under section 270.1(b), these hazardous waste generators, transporters, and TSDFs, are also subject to newly promulgated or revised regulations at 40 CFR Part 261 (identification and listing of hazardous wastes) and must notify EPA of new or revised hazardous waste activities no later than 90 days after promulgation or revision. In addition, other generators; transporters; recyclers; and treatment, storage and disposal facilities that are subject to notification requirements under sections 266.21, 266.22, 266.23, 266.70(b)(1), 266.80(b)(1)(i),

266.80(b)(2)(i), 266.101(a), 266.101(b), 266.101(c), 266.102(a)(2)(ii), 266.103(a)(4)(ii), and 273.60(a) must notify EPA of their hazardous waste activities within the same time frame. Under section 273.54, universal waste transporters who determine that any material resulting from a release of universal waste is a hazardous waste are subject to 40 CFR Part 262. As a result, these transporters may also be subject to, under these circumstances, the section 262.12 notification requirements and procedures. As such, these transporters must, at that time, notify EPA of their hazardous waste activities and obtain an EPA Identification Number before treating, storing, transporting, offering for transport, or disposing of hazardous waste. Finally, owners or operators of smelting, melting, and refining furnaces that process hazardous waste either solely for metals recovery or for recovery of economically significant amounts of certain precious metals under sections 266.100(c)(1)(i) and 266.100(f)(1), respectively, and facilities that qualify for the small quantity on-site burner exemption under section 266.108(d) must provide a written, one-time notification of their hazardous waste activities.

(c) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

(c1) Intent to Comply with Subpart K and Recordkeeping of Agreements

Under 40 *CFR* 262.203(a), an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is electing to be subject to the requirements of Subpart K. This is a one-time notification.

Section 262.203(c) provides that an eligible academic entity must keep a copy of the notification on file at the eligible academic entity while its laboratories are subject to Subpart K.

Section 262.203(d) provides that a teaching hospital that is not owned by a college or university must keep a copy of its formal written affiliation agreement with a college or university on file at the teaching hospital while its laboratories are subject to Subpart K.

Section 262.203(e) provides that a non-profit research institute that is not owned by a college or university must keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K.

(c2) Withdrawal from 40 CFR Part 262, Subpart K

Under 40 *CFR* 262.204(a), an eligible academic entity must notify the appropriate EPA Regional Administrator in writing, using the RCRA Subtitle C Site Identification Form (EPA Form 8700-12), that it is electing to no longer be subject to the requirements of Subpart K for all the laboratories owned by the eligible academic entity under the same EPA Identification

Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all the laboratories owned by the eligible academic entity that are on-site. An eligible academic entity must submit a separate notification (Site ID Form) for each EPA Identification Number (or site, for CESQGs) that is withdrawing from the requirements of Subpart K. This is a one-time notification.

Section 262.204(c) provides that an eligible academic entity must keep a copy of the withdrawal notice on file at the eligible academic entity for three years from the date of the notification.

(d) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

Under Section 273.32(a)(1), large quantity handlers of universal waste must submit a written, one-time notification of universal waste activity to the Regional Administrator and obtain an EPA Identification Number before meeting or exceeding the 5,000 kilogram storage limit, unless they already have notified EPA, as provided by section 273.32(a)(2) or 273.32(a)(3).

(e) Notification of Used Oil Activity under 40 CFR Part 279

Under sections 279.42, 279.51, 279.62 and 279.73, used oil handlers who were not previously required to comply with the notification requirements (under 40 CFR Part 266, Subpart E) must submit a written, one-time notification of their used oil management activities and obtain an EPA Identification Number.

(3) Part A Hazardous Waste Permit Application and Modification

(a) Part A Permit Application

Owners or operators of new hazardous waste management facilities that are not yet constructed are required to submit their Part A Permit Application, including signatures and certifications at least 180 days before physical construction is expected to commence. For existing facilities newly subject to RCRA permitting requirements due to promulgation of a new regulation or listing of hazardous waste, the new regulation typically specifies the date by which Part A Permit Applications, including signatures and certifications, must be submitted.

(b) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations

The time frame in which owners or operators must submit a revised Part A Permit Application varies according to the nature of changes at the facility. For the following types of changes, the owner or operator must submit revised Part A Permit Applications and justifications prior to making the changes:

- Treating, storing, or disposing of hazardous wastes not previously identified in the Part A Permit Application.

- Increasing the design capacity of processes used at the facility.
- Changing or adding processes for treating, storing, or disposing of hazardous wastes.

For changes in ownership or operational control of a facility, the new owner or operator must submit a revised Part A Permit Application no later than 90 days prior to the scheduled change. Subpart H compliance demonstrations must be submitted within six months of the date of the change in ownership or operational control of the facility.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) ESTIMATING RESPONDENT BURDEN HOURS

Exhibits 1 through 3 provide estimates of the respondent hourly burden associated with the information collection requirements covered in this ICR. The exhibits include burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. The majority of the hour estimates in Exhibits 1 through 3 are based on consultations with industry and States.

In the following paragraphs, EPA describes the methodologies used to estimate the hourly burden associated with the information collections covered in this ICR.

(1) Hazardous Waste Report

(a) Methodology for Accounting for Site Identification Forms Pre-Populated by States

In estimating the hourly burden for preparing the Site ID Form of the Hazardous Waste Report, EPA assumes that 65 percent of all the Site ID Forms will be pre-populated by States prior to distribution to respondents or by vendor software used by the respondents. EPA also assumes that the remaining 35 percent of all the Site ID Forms will be completed manually.

EPA estimates the burden for updating a pre-populated Site ID Form to be about 37 minutes (0.61 hour) per respondent and the burden for completing a Site ID Form in its entirety (i.e., completing a blank form manually) to be 1.26 hour per respondent.

The above burden estimates are reflected in Exhibit 1 as weighted-averages. EPA derived the weighted averages using the calculations in Table 3 below. EPA multiplied the percentage of pre-populated Site ID Forms by the average burden for updating the information contained in the form. EPA also multiplied the percentage of blank Site ID Forms by the average burden for completing the blank form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 3

Assumptions and Weighted-Average Equation Used in Estimating Burden to Complete the Site Identification Form of the Hazardous Waste Report

Assumptions	Weighted-Average Equation
0.61 hours to complete pre-populated form; 65 percent of the forms are pre-populated	$(0.61 \text{ hr} \times 0.65) + (1.26 \text{ hrs} \times 0.35)$ $= 0.84 \text{ hours}$
1.26 hour to complete blank form; 35 percent of the forms are blank	

(b) Methodology for Accounting for Form GM and Form WR Electronic Reporting

During consultations conducted during the development of previous versions of this ICR, State and facility representatives indicated that Forms GM and WR often can be completed from RCRAInfo that track manifests or other information for billing purposes. Based on these consultations, EPA estimated the hourly burden for the Forms GM and WR submitted electronically to be significantly less than for forms submitted on paper.

To estimate the percentage of facilities that submit Forms GM and WR electronically, EPA used information gained from consultations and 2017 Hazardous Waste Report data. For Form GM submissions, EPA estimated that, based on consultations and best professional judgment, facilities submitting five (5) or more Forms GM for the Hazardous Waste Report are likely to do so electronically. Using 2017 Hazardous Waste Report data, EPA identified sites submitting Forms GM, counted their Forms GM submitted, and calculated the percentage that their Forms GM represented of the total number of Forms GM. Based on this methodology, EPA estimates that 94 percent of Forms GM are submitted electronically, while the remaining 6 percent are sent manually.

For Forms WR, EPA believes that TSDFs receiving large numbers of off-site shipments are more likely to have systems in place to track waste stream data, and as a consequence, to submit Hazardous Waste Report data electronically. Using 2017 Hazardous Waste Report data, EPA reviewed the list of Forms WR reported to the Hazardous Waste Report by facility and, based on its own professional judgment and consultations, estimates that 100 percent of Forms WR are submitted electronically.

To estimate the average burden per respondent in preparing a Form GM or WR, EPA used the weighted-average calculations in Table 4. EPA multiplied the percentage of both forms submitted electronically by their respective burden for electronic reporting and the percentage of both forms submitted manually by their respective burden for manual reporting. Then, EPA added the two products for each form, respectively, to calculate an overall weighted-average burden for both forms.

Table 4
Assumptions and Weighted-Average Equations Used in Estimating Burden to Complete Form GM and Form WR of the Hazardous Waste Report

Activity	Assumptions	Weighted-Average Equation
Complete Form GM	0.27 hour to complete electronically; 94 percent of the forms are completed electronically 1.19 hours to complete manually; 6 percent of the forms are completed manually	$(0.27 \text{ hr} \times 0.94) + (1.19 \text{ hrs} \times 0.06)$ = 0.32 hour
Complete Form WR	0.12 hour to complete electronically; 100% of the forms are completed electronically	$0.12 \text{ hr} \times 1$ = 0.12 hour

(2) Notification of Regulated Waste Activity

(a) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

For purposes of this ICR, EPA anticipates that all of the facilities electing to operate under the hazardous secondary material exclusion under 40 CFR 260.42 during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form to notify EPA or the State prior to operating under the exclusion and by March 1 of each even numbered year. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form under section 260.42 to be 1.33 hours per respondent and the burden for using a previously submitted form to be 0.95 hours per respondent. EPA notes that section 260.42 imposes several substantive requirements specific to the exclusions that must be completed (e.g., quantity of secondary material to be managed annually) in addition to the rest of the Site ID Form.

For the notification submitted indicating that the hazardous secondary materials are no longer managed in accordance to the exclusion, EPA estimates the average hourly burden for completing the Site ID Form in its entirety (i.e., a blank form) to be about 50 minutes (0.83 hour) per respondent. EPA also estimates the average hourly burden for updating the most recently submitted Site ID Form to be 27 minutes (0.45 hour) per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 5 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 5
Assumptions and Weighted-Average Equation
Used in Estimating Burden to Complete the Notification of
Hazardous Secondary Material Activity under 40 CFR 260.42

Assumptions	Weighted-Average Equation
Notification Prior to Operating under Exclusion AND Notification Submitted by March 1 of Each Even Numbered Year Thereafter	
1.33 hours to complete blank form; 50 percent of the facilities	$(1.33 \text{ hrs} \times 0.50) + (0.95 \text{ hr} \times 0.50)$ $= 1.14 \text{ hours}$
0.95 hour to update most recently submitted form; 50 percent of the facilities	
Notification Indicating that Hazardous Secondary Materials are no Longer Managed in Accordance to the Exclusion	
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ $= 0.64 \text{ hour}$
0.45 hour to update most recently submitted form; 50 percent of the facilities	

(b) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

For purposes of this ICR, EPA anticipates that all of the facilities opting into Subpart K during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form in opting into Subpart K and in withdrawing from Subpart K. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form under Subpart K to be 50 minutes (0.83 hour) per respondent and the burden for using a previously submitted form to be 27 minutes (0.45 hour) per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 6 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 6
Assumptions and Weighted-Average Equation
Used in Estimating Burden to Complete the Notification of
Hazardous Waste Activity under 40 CFR Part 262, Subpart K

Assumptions	Weighted-Average Equation
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ $= 0.64 \text{ hour}$
0.45 hour to update most recently submitted form; 50 percent of the facilities	

(c) Other Notifications Covered in this ICR

For purposes of this ICR, EPA anticipates that 50 percent of the facilities submitting subsequent notifications under RCRA Section 3010; 40 CFR Part 273, Subpart C; and 40 CFR Part 279 will complete a blank Site ID Form. EPA estimates that the other 50 percent will use their most recently submitted Site ID Form in complying with these notification requirements.

EPA estimates the burden for completing a blank Site ID Form to be 50 minutes (0.83 hour) per respondent and the burden for using a previously submitted form to be 27 minutes (0.45 hour) per respondent.

The above burden estimates are reflected in Exhibit 2 as weighted-averages. EPA derived the weighted averages using the calculations in Table 7 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 7
Assumptions and Weighted-Average Equation Used in
Estimating Burden to Complete Other Notifications Covered in this ICR

Assumptions	Weighted-Average Equation
0.83 hour to complete blank form; 50 percent of the facilities	$(0.83 \text{ hr} \times 0.50) + (0.45 \text{ hr} \times 0.50)$ $= 0.64 \text{ hour}$
0.45 hour to update most recently submitted form; 50 percent of the facilities	

(3) Part A Hazardous Waste Permit Application and Modification

In estimating the hourly burden for preparing the Site ID Form of the Part A Permit Application, EPA assumes that all of the facilities submitting a Part A Permit Application or Modification during the two-year period covered by this ICR have already submitted the Site ID Form at least once. Of these facilities, EPA estimates that 50 percent will complete a blank Site ID Form and the remaining 50 percent will use their most recently submitted Site ID Form.

EPA estimates the burden for completing a blank Site ID Form to be 1.26 hour per respondent and the burden for using a previously submitted form to be 37 minutes (0.61 hour) per respondent.

The above burden estimates are reflected in Exhibit 3 as weighted-averages. EPA derived the weighted averages using the calculations in Table 8 below. EPA multiplied the percentage of facilities completing the Site ID Form on its entirety by the average burden for completing the blank form. EPA also multiplied the percentage of facilities that will use the most recently submitted Site ID Form by the average burden for updating the information contained in the form. Then, EPA added up these two products to derive an overall weighted-average burden.

Table 8
Assumptions and Weighted-Average Equation Used in Estimating
Burden to Complete the Site Identification Form of the Part A Permit Application

Assumptions	Weighted-Average Equation
1.26 hour to complete blank form; 50 percent of the facilities	$(1.26 \text{ hrs} \times 0.50) + (0.61 \text{ hr} \times 0.50)$ $= 0.94 \text{ hour}$
0.61 hour to update most recently submitted form; 50 percent of the facilities	

6(b) ESTIMATING RESPONDENT COSTS

Exhibits 1 through 3 provide estimates of the annual respondent costs associated with the information collection requirements covered in this ICR. These costs are based on the cost of labor, capital, and operation and maintenance (O&M).

(1) Labor Costs

Using the total burden hours discussed in Section 6(a) and the hourly labor costs outlined in this section, Exhibits 1 through 3 illustrate the labor costs associated with the information collection requirements covered in this ICR.

(a) Private Sector Facilities

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$147.36 for legal staff, \$87.09 for managerial staff, \$64.89 for technical staff, and \$39.03 for clerical staff. These respondent labor costs were obtained from the previously approved ICR and updated to 2020 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.¹

(b) State and Local Government Facilities and Agencies

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$68.37 for legal staff, \$64.18 for managerial staff, \$38.40 for technical staff, and \$24.49 for clerical staff. These respondent labor costs were obtained from the previously approved ICR and updated to 2020 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.²

(2) Capital Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

¹ Bureau of Labor Statistics, "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry," *Employment Cost Index Historical Listing – Volume V*. <http://www.bls.gov/web/eci/ecicois.pdf>.

² Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," *Employment Cost Index Historical Listing – Volume V*. <http://www.bls.gov/web/eci/ecicois.pdf>.

(3) Operation and Maintenance Costs

O&M costs are those costs associated with an information collection requirement incurred continually over the life of the ICR. For this ICR, O&M costs include mailing costs:

- EPA estimates that facilities submitting a Hazardous Waste Report or a Part A Permit Application to EPA or States will incur a cost of \$6.21 to mail an 11-ounce large envelope by certified mail (\$2.50 for postage, \$3.50 for the certified-mail fee, and \$0.21 for a catalog envelope).^{3, 4, 5}
- EPA estimates that facilities submitting a notification to EPA will incur a cost of \$4.09 to mail a one-ounce letter by certified mail (i.e., \$0.55 for first-class letter postage, \$3.50 for the certified-mail fee, and \$0.04 for standard business envelope).^{6, 7, 8}
- EPA estimates that State agencies distributing the Hazardous Waste Report to facilities will incur a cost of \$2.71 to mail an 11-ounce large envelope (\$2.50 for postage and \$0.21 for a catalog envelope).^{9, 10}

The above O&M costs are shown in Exhibits 1 through 3 for all applicable respondent activities.

6(c) ESTIMATING AGENCY HOUR AND COST BURDEN

EPA estimates the Agency hour and cost burden associated with the information collection requirements covered in this ICR in Exhibits 4 through 6. As shown in the exhibits, EPA estimates an average hourly labor cost of \$95.02 for legal staff (GS15, Step 5), \$83.84 for managerial staff (GS-15, Step 1), \$60.32 for technical staff (GS-13, Step 1), and \$25.73 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2019.¹¹ This publication summarizes the unloaded (base) hourly rate for various labor categories in the Federal Government. EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates.

³ U.S. Postal Service, "First-Class Mail." <https://www.usps.com/business/prices.htm?>

⁴ U.S. Postal Service, "Add Extra Services for Business." <https://www.usps.com/business/add-extra-services.htm?>

⁵ Catalog envelope cost based on current market price.

⁶ U.S. Postal Service, "First-Class Mail." <https://www.usps.com/business/prices.htm?>

⁷ U.S. Postal Service, "Add Extra Services for Business." <https://www.usps.com/business/add-extra-services.htm?>

⁸ Standard business envelope cost based on current market price.

⁹ U.S. Postal Service, "First-Class Mail." <https://www.usps.com/business/prices.htm?>

¹⁰ Catalog envelope cost based on current market price.

¹¹ U.S. Office of Personnel Management, "2019 General Schedule (Base)," Hourly Rate.

EPA does not anticipate that the Agency will incur capital costs in carrying out the information collection requirements covered in this ICR.

O&M costs are associated with Hazardous Waste Report activities. In particular, EPA estimates that the Agency will incur a cost of \$23,709 in printing paper and CD copies of the Hazardous Waste Report forms and instructions, \$296,367 in developing computer capabilities required to compile national data, \$59,273 in preparing the National Report, and \$41,492 in storing the national data. These O&M costs were obtained from the previously approved ICR and updated to 2020 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.¹² EPA O&M costs are shown in Exhibit 4 for all applicable activities.

6(d) ESTIMATING RESPONDENT UNIVERSE AND TOTAL HOUR AND COST BURDEN

In this section, EPA first describes the estimated respondent universe. EPA then estimates the annual burden to respondents under the information collection requirements covered in this ICR.

EPA notes that, as used in this document, the term “respondent” includes:

- Hazardous waste facilities complying with the Hazardous Waste Report, notification, and Part A Permit Application requirements covered in this ICR. This includes:
 - Private sector entities; and
 - State and local government agencies that are regulated entities¹³.
- State agencies administering the RCRA hazardous waste program¹⁴.

(1) Respondent Universe

(a) Hazardous Waste Report

Based on 2017 Hazardous Waste Report data, EPA estimates that the total number of respondents to the 2019 Hazardous Waste Report will be 26,312, which annualized over the two-year report cycle equals 13,156 per year (i.e., 26,312/2). Table 9 presents information on the total number of forms associated with the 2019 Hazardous Waste Report. In estimating annual respondent burden and cost, EPA annualized these numbers over the two-year report cycle.

¹² Bureau of Labor Statistics, “Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all.”

¹³ Addressing State and local government agencies as “respondents” is consistent with EPA’s interpretation of the definition of respondent in the Paperwork Reduction Act of 1995.

¹⁴ Ibid.

**Table 9
Total Number of 2019 Hazardous Waste Report Forms**

Hazardous Waste Report Form	Number of Forms ^a		
	Private Sector	State and Local Government	Total
Site Identification (Site ID) Form	25,000	1,312	26,312
Form GM - Generation and Management	308,252	12,200	320,452
Form WR - Waste Received from Offsite	1,607,704	12,589	1,620,293
Total	1,940,956	26,101	1,967,057

The number of respondents and forms for each respondent activity is presented in Exhibit 1. These estimates assume that all forms are submitted in accordance with the Hazardous Waste Report instructions. Exhibit 1 also estimates the annual respondent burden and cost for the activities examined.

(b) Notification of Regulated Waste Activity

In estimating the number of respondents subject to the notification requirements covered in this ICR, EPA referred to RCRAInfo. EPA estimated the annual number of notifications tracked by RCRAInfo. These estimates are presented in Table 10 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 2 of this ICR.

(c) Part A Hazardous Waste Permit Application and Modification

In estimating the number of respondents subject to the Part A Permit Application requirements covered in this ICR, EPA referred to the RCRAInfo system. EPA estimated the annual number of Part A Permit Applications tracked by RCRAInfo. These estimates are presented in Table 11 and used to estimate the total respondent burden and costs per information collection activity shown in Exhibit 3 of this ICR.

Table 10
Annual Number of Respondents Subject to the Notification Requirements Covered in this ICR

	Private Sector	State and Local Government	Total
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42			
Number of facilities submitting notification prior to operating under exclusion	43	2	45
Number of facilities submitting notification indicating that they will no longer manage hazardous secondary materials in accordance with the exclusion	3	0	3
Notification of Hazardous Waste Activity under RCRA Section 3010			
Number of facilities submitting initial notification	9,021	1,400	10,421
Number of facilities submitting subsequent notification	38,708	1,522	40,260
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K			
Number of eligible academic entities submitting notification of intent to comply with Subpart K and recordkeeping of agreements	13	51	64
Number of teaching hospitals not owned by a college or university opting into Subpart K	3	1	4
Number of non-profit research institutes not owned by a college or university opting into Subpart K	2	0	2
Number of eligible academic entities submitting notification of withdrawal from 40 CFR Part 262, Subpart K	191	33	224
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C			
Number of facilities submitting initial notification	110	8	118
Number of facilities submitting subsequent notification	1,256	113	1,369
Notification of Used Oil Activity under 40 CFR Part 279			
Number of facilities submitting initial notification	97	3	100
Number of facilities submitting subsequent notification	596	30	626
Hazardous Waste Pharmaceuticals Rule			
Notification Healthcare Facilities	0	0	0
Notification Reverse Distributors	0	0	0
Withdrawal from 40 CFR Part 266, Subpart P	0	0	0
Hazardous Waste Generator Improvements Rule			
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)	33	2	35
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)	6	2	8
Re-Notification by SQGs under 40 CFR 262.18	0	0	0
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L	372	45	417

Table 11
Annual Number of Respondents Subject to the Part A Permit Application Requirements
Covered in this ICR

	Private Sector	State and Local Government	Total
Number of facilities submitting initial Part A Permit Application	3	0	3
Number of facilities submitting Part A Permit Modification	21	1	21

(2) Annual Respondent Burden

(a) Hazardous Waste Report - Facilities (Exhibits 1A and 1B)

(a1) Read the Hazardous Waste Report Instructions

EPA estimates that all 26,312 respondents will read the Hazardous Waste Report instructions. Annualized over the two-year report cycle, this results in 13,156 respondents reading the instructions each year (i.e., 12,500 private sector facilities and 656 State and local government facilities).

(a2) Revise In-House or Commercial Data System

EPA estimates that all 15,652 electronic reporters will revise their in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations. Annualized over the two-year report cycle, this results in 7,826 respondents revising their in-house or commercial data systems each year (i.e., 7,604 private sector facilities and 222 State and local government facilities).

(a3) Gather Information and Complete Site Identification Form

EPA estimates that all 26,312 respondents will complete and submit a Site ID Form with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 13,156 respondents preparing and submitting a Site ID Form each year (i.e., 12,500 private sector facilities and 656 State and local government facilities).

(a4) Gather Information and Complete Form GM

EPA estimates that respondents will submit a total of 308,252 Forms GM with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 154,126 Forms GM each year (i.e., 148,530 forms from private sector facilities and 5,596 forms from State and local government facilities).

(a5) Gather Information and Complete Form WR

EPA estimates that respondents will submit a total of 1,607,704 Forms WR with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 803,852 Forms WR each year (i.e., 797,557 forms from private sector facilities and 6,295 forms from State and local government facilities).

Note that the number of Forms WR represents the number of blocks on Form WR that have been completed; the paper form actually contains three blocks of the same WR information (i.e., the same questions, repeated three times on the same page).

(a6) Gather Information and Complete Form OI

Because this form is a State-optional form, EPA does not expect any facilities to submit Form OI and therefore does not calculate the burden for this form.

(a7) Submit the Biennial Report to State/Region

EPA expects each respondent, 13,156 facilities per year (i.e., 12,500 private sector facilities and 656 State and local government facilities), to submit the report to the appropriate State or Region.

(a8) Maintain a Copy of Each Form

EPA expects facilities to retain an estimated 971,134 (i.e., 13,156 Site ID Forms + 154,126 Forms GM + 803,852 Forms WR) forms each year (i.e., 958,587 forms from private sector facilities and 12,547 forms from State and local government facilities).

(b) Hazardous Waste Report – State Agencies (Exhibit 1C)

(b1) Distribute Hazardous Waste Report Forms and Instructions

EPA estimates that State agencies will distribute Hazardous Waste Report forms and instructions to 26,101 respondents. Annualized over the two-year report cycle, this results in 13,050 respondents each year.

(b2) Assist Respondents

EPA expects State agencies to provide assistance to all 26,101 respondents. Annualized over the two-year report cycle, this results in 13,050 respondents each year.

(b3) Key Entry of Report Submissions

EPA estimates that State agencies will need to key enter data for 26,101 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) completed manually by the facilities. Annualized over the two-year report cycle, this results in 13,050 respondents each

year.

(b4) Perform Quality Assurance

EPA expects State agencies to perform data quality assurance on all 1,967,057 Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) submitted by facilities. Annualized over the two-year report cycle, this results in 983,529 respondents each year.

(c) Notification of Regulated Waste Activity - Facilities (Exhibits 2A and 2B)

(c1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

EPA estimates that, each year, 45 entities (i.e., 43 private sector facilities and 2 State and local government facility) will notify under 40 CFR 260.42 prior to operating under the exclusion and be required to complete the information laid out at section 260.42(a).

EPA estimates that, each year, 3 entities will re-notify because they stopped operating under the exclusion (i.e., 3 private sector facilities and 0 State and local government facilities).

(c2) Notification of Hazardous Waste Activity under RCRA Section 3010

EPA estimates that, each year, 10,421 facilities (i.e., 9,021 private sector facilities and 1,400 State and local government facilities) will submit an initial notification of hazardous waste activity under RCRA Section 3010. EPA also estimates that, each year, 40,260 facilities (i.e., 38,708 private sector facilities and 1,552 State and local government facilities) will submit a subsequent notification associated with these requirements.

(c3) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

Intent to Comply with Subpart K and Recordkeeping of Agreements

An eligible academic entity must submit the Site ID Form to notify EPA or the authorized State that it is electing to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number. An eligible academic entity that is a CESQG and does not have an EPA Identification Number must notify for all laboratories that are owned or operated by the eligible academic entity that are on-site. EPA estimates that, each year, 64 forms will be completed, submitted, and retained (i.e., 13 forms from private sector entities and 51 forms from State and local government entities).

Teaching hospitals opting into Subpart K must keep a copy of their formal written affiliation agreement with a college or university on file if they are not owned by a college or university. EPA estimates that, each year, 3 site will retain the agreement on file (i.e., 1 agreements from private sector entities and 4 agreement from State and local government entities).

Non-profit research institutes not owned by a college or university opting into Subpart K must keep a copy of the formal written affiliation agreement with a college or university on file. EPA estimates that, each year, 2 sites will retain the agreement on file (i.e., 2 agreements from private sector entities and 0 agreements from State and local government entities).

Withdrawal from 40 CFR Part 262, Subpart K

EPA estimates that, each year, 224 eligible academic entities will submit a notification of withdrawal from 40 CFR Part 262, Subpart K. (i.e., 191 notifications from private sector entities and 33 notification from State and local government entities).

(c4) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

EPA estimates that, each year, 118 facilities (i.e., 110 private sector facilities and 8 State and local government facilities) will submit an initial notification of universal waste activity under 40 CFR Part 273, Subpart C.

EPA also estimates that, each year, 1,369 facilities (i.e., 1,256 private sector facilities and 113 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C.

(c5) Notification of Used Oil Activity under 40 CFR Part 279

EPA estimates that, each year, 100 facilities (i.e., 97 private sector facilities and 3 State and local government facilities) will submit an initial notification of used oil activity under 40 CFR Part 279.

EPA also estimates that, each year, 626 facilities (i.e., 596 private sector facilities and 30 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C.

(c6) Notification Under the Generator Improvements Rule

EPA estimates that, each year, 35 facilities (i.e., 33 private sector facilities and 2 State and local government facilities) will submit a notification of closure by an LQG under 40 CFR 262.17(a)(8).

EPA estimates that, each year, 8 facilities (i.e., 6 private sector facilities and 2 State and local government facilities) will submit a notification of consolidation of VSQG hazardous waste by an LQG under 40 CFR 262.17(f).

EPA also estimates that, each year, 417 facilities (i.e., 372 private sector facilities and 45 State and local government facilities) will submit a notification of the use of alternatives standards for episodic generation under 40 CFR Part 262, Subpart L.

(d) Notification of Regulated Waste Activity – State Agencies (Exhibit 2C)

State agencies will conduct the information collection activities associated with the Notification of Regulated Waste Activity in Authorized States.

(d1) Notification of Hazardous Secondary Material Activity under 40 CFR 260.42

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 39 facilities that plan to operate under the exclusion at 40 CFR 260.42, 10 facilities that must re-notify by March 1 of each even numbered year, and 3 facilities that will re-notify because they stopped operating under the exclusion.

(d2) Notification of Hazardous Waste Activity under RCRA Section 3010

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 10,213 facilities that will submit an initial notification of hazardous waste activity under RCRA Section 3010 and for 39,455 facilities that will submit a subsequent notification associated with these requirements.

(d3) Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K

Intent to Comply with Subpart K and Recordkeeping of Agreements

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 64 eligible academic entities that elect to be subject to Subpart K for all laboratories owned by the eligible academic entity under the same EPA Identification Number.

Withdrawal from 40 CFR Part 262, Subpart K

EPA estimates that, each year, State agencies will review and enter notification information into RCRAInfo for 224 eligible academic entities that withdraw from the 40 CFR Part 262, Subpart K requirements.

(d4) Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C

EPA estimates that, each year, State agencies will review and enter initial notification information into RCRAInfo for 116 facilities. Of these facilities, 87 will use the Site ID Form and 29 will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, State agencies will review and enter subsequent notification information into RCRAInfo for 1,341 facilities. Of these facilities, 1,006 will use the Site ID Form and 335 will prepare and submit a letter requesting an EPA Identification Number.

(d5) Notification of Used Oil Activity under 40 CFR Part 279

EPA estimates that, each year, State agencies will review and enter initial notification information into RCRAInfo for 99 facilities. Of these facilities, 74 will use the Site ID Form and 25 will prepare and submit a letter requesting an EPA Identification Number.

EPA also estimates that, each year, State agencies will review and enter subsequent notification information for 614 facilities. Of these facilities, 460 will use the Site ID Form and 154 will prepare and submit a letter requesting an EPA Identification Number.

(d6) Notification Under the Generator Improvements Rule

EPA estimates that, each year, State agencies will review and enter initial notification of closure information into RCRAInfo for 70 facilities, consolidation of VSQG by an LQG for 4 facilities, and use of alternative standards for episodic generation for 417 facilities.

(e) Part A Hazardous Waste Permit Application and Modification - Facilities (Exhibits 3A and 3B)

(e1) Part A Permit Application

EPA estimates that, each year, 3 facilities (i.e., 3 private sector facilities and 0 State and local government facility) will submit a new Part A Permit Application. All facilities will need to obtain signatures for the Part A Permit Application, Part A Permit Application reports, and other information requested by the Director. In addition, all facilities will need to obtain certifications from persons signing permit documentation.

(e2) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations

EPA estimates that, each year, 7 facilities (i.e., 7 private sector facilities and 0 State and local government facilities) will need to revise their Part A Permit Application.

(f) Part A Hazardous Waste Permit Application and Modification – State Agencies (Exhibit 3C)

(f1) Part A Permit Application

EPA estimates that, each year, State agencies will receive 3 Part A Permit Applications. State agencies will need to review the applications, review the signatories to the permit applications and reports, and enter the Part A Permit Application information into RCRAInfo.

(f2) Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations

EPA estimates that, each year, State agencies will receive 21 revised Part A Permit Applications. State agencies will need to review the applications and enter the Part A Permit Application information into RCRAInfo.

1 6(e) BOTTOM LINE HOUR AND COST BURDEN

(1) Respondent Tally

Exhibit 7 summarizes the total annual respondent hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual respondent burden to be 809,381 hours and \$37,658,164.

(2) Agency Tally

Exhibit 8 summarizes the total annual EPA hour and cost burden associated with all the requirements covered in this ICR. As shown in the exhibit, EPA estimates the annual EPA burden to be 3,761 hours and \$402,545.

6(f) REASONS FOR CHANGE IN BURDEN

The total burden for the current ICR (EPA ICR Number 0976.18) is 647,425 hours. The total burden for this renewal (EPA ICR Number 0976.19) is 809,381 hours. This represents an increase of 161,956. The breakdown of this burden increase is explained below.

(1) Hazardous Waste Report

(a) Facility Burden

For facilities, the annual burden estimate for the 2017 Hazardous Waste Report (EPA ICR Number 0976.18) was 215,045 hours. The annual burden estimate for the 2019 Hazardous Waste Report is 251,173 hours. This represents an increase of 36,128 hours. According to Table 12 below, there was an increase of 428,651 forms from the 2015 Biennial Report and the 2017 Biennial Report. This increase in forms was due to the addition of retailers selling nicotine replacements therapy to the universe of facilities required to submit a biennial report.

Table 12
Comparison of Projected Number of Hazardous Waste Report Forms in the
Previously Approved ICR (EPA ICR Number 0976.18) and
this ICR (EPA ICR Number 0976.19)

Hazardous Waste Report Form	Projected Number of Forms		Difference
	EPA ICR Number 0976.18¹⁵	EPA ICR Number 0976.19¹⁶	
Site ID Form - RCRA Subtitle C Site Identification Form	26,083	26,312	229
Form GM - Generation and Management	289,758	320,452	30,694
Form WR - Waste Received from Offsite	1,222,565	1,620,293	397,728
Total	1,538,406	1,967,057	428,651

(b) State Agency Burden

For State agencies, the annual burden estimate for the 2017 Hazardous Waste Report (EPA ICR Number 0976.18) was 304,996 hours. The annual burden estimate for the 2019 Hazardous Waste Report (EPA ICR Number 0976.19) is 378,517 hours. This represents an increase of 73,521 hours. This increase is explained above.

Notification of Regulated Waste Activity

(a) Facility Burden

For facilities, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.18) was 37,074 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.19) is 39,338 hours. This represents an increase of 2,264 hours. According to Table 13 below, this increase is due to the increase of facilities notifying in several areas, but notably the addition of facilities wishing to utilize alternative standards for episodic generation under the 2016 Hazardous Waste Generator Improvements Rule.

¹⁵ Based on the actual number from the 2015 reporting cycle

¹⁶ Based on the actual number from the 2017 reporting cycle

Table 13
Comparison of Projected Number of Notifications in the
Previously Approved ICR (EPA ICR Number 0976.18) and
this ICR (EPA ICR Number 0976.19)

Type of Notification	Projected Number of Notifications		Difference
	EPA ICR Number 0976.18	EPA ICR Number 0976.19	
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42	30	60	30
Notification of Hazardous Waste Activity under RCRA Section 3010	50,225	50,681	456
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K	54	294	240
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C	163	1,488	1,325
Notification of Used Oil Activity under 40 CFR Part 279	355	726	371
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)	0	70	70
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)	0	4	4
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L	0	417	417
Total	50,827	53,740	2,913

(b) State Agency Burden

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.18) was 90,000 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.19) is 139,820 hours. This represents an increase of 49,820 hours. This increase is explained above.

(2) Part A Hazardous Waste Permit Application and Modification

(a) Facility Burden

For facilities, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.18) was 323 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.19) is 369 hours. This represents an increase of 46 hours.

(b) State Agency Burden

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.18) was 78 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.19) is 164 hours. This represents a decrease of 86 hours.

6(g) PUBLIC BURDEN STATEMENT

(1) Hazardous Waste Report

The reporting burden is estimated to be about 14 hours for a facility to gather data, complete and review the forms, and submit the Hazardous Waste Report. The recordkeeping burden is estimated to be about 5 hours to read the instructions, and file and store the Hazardous Waste Report submission for three years.

The reporting burden is estimated to be about 30 hours per facility for a State agency to distribute the Hazardous Waste Report Instructions and Forms, assist respondents, key entry report submissions, and perform quality assurance. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

(2) Notification of Regulated Waste Activity

The reporting burden associated with notification requirements is estimated to be about 1 hour for a facility. There are no recordkeeping requirements associated with this requirement, and as such, there is no recordkeeping burden.

The recordkeeping burden associated with notification requirements (initial and subsequent) is estimated to be 2 hours for State agencies to review and enter notification information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

(3) Part A Hazardous Waste Permit Application and Modification

The reporting burden associated with the Part A Permit Application requirements is estimated to be about 24 hours for a facility to prepare and submit a Part A Permit Application. The recordkeeping burden is estimated to be about 7 hours to read the regulations.

The reporting burden associated with the Part A Permit Application requirements is estimated to be about 12 minutes for a State agency to notify an applicant of a deficiency in the Part A Permit Application. The recordkeeping burden is estimated to be about 5 hours to review an application and signatories to the permit applications and reports, and enter the Part A Permit Application information into RCRAInfo.

The recordkeeping burden associated with revising a Part A Permit Applications is estimated to be 5 hours for State agencies to review a Part A Permit Application, justification, and Subpart H compliance demonstration, and enter the Part A Permit Application information into RCRAInfo. There are no reporting requirements associated with this requirement, and as such, there is no reporting burden.

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 EPA'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-2019-0558, 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 Building, Room 3334, 1301 Constitution Avenue, 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 RCRA Docket is (202) 566-0270, and the fax number is (202) 566-9744. 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-2019-0558 and OMB Control Number 2050-0024 in any correspondence.

EXHIBIT 1A
 2017 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES ^a

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$147.36/ Year	Mgr. \$87.09/ Year	Tech. \$64.89/ Year	Cler. \$39.03/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
Hazardous Waste Report											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$203.07	\$0.00	\$0.00	12,500	34,500.00	\$2,538,375.00
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$72.22	\$0.00	\$0.00	7,964	7,964.00	\$575,160.08
Gather information and prepare Site ID Form	0.00	0.08	0.60	0.16	0.84	\$52.15	\$0.00	\$0.00	12,500	10,500.00	\$651,875.00
Gather information and prepare Form GM	0.00	0.13	0.15	0.04	0.32	\$22.62	\$0.00	\$0.00	154,126	49,320.32	\$3,486,330.12
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$8.82	\$0.00	\$0.00	803,852	96,462.24	\$7,089,974.64
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$99.98	\$0.00	\$6.21	12,500	16,750.00	\$1,327,375.00
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$1.43	\$0.00	\$0.00	970,478	29,114.34	\$1,387,783.54
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	244,610.90	\$17,056,873.38

EXHIBIT 1B
 2017 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Hazardous Waste Report											
Read the Hazardous Waste Report instructions	0.00	1.08	1.68	0.00	2.76	\$133.83	\$0.00	\$0.00	656	1,810.56	\$87,792.48
Revise in-house or commercial data system to include new Hazardous Waste Report data items that are not part of the facility's general business operations	0.00	0.33	0.67	0.00	1.00	\$46.91	\$0.00	\$0.00	222	222.00	\$10,414.02
Gather information and prepare Site ID Form	0.00	0.08	0.60	0.16	0.84	\$32.09	\$0.00	\$0.00	656	551.04	\$21,051.04
Gather information and prepare Form GM	0.00	0.13	0.15	0.04	0.32	\$15.08	\$0.00	\$0.00	6,100	1,952.00	\$91,988.00
Gather information and prepare Form WR	0.00	0.07	0.03	0.02	0.12	\$6.13	\$0.00	\$0.00	6,295	755.40	\$38,588.35
Gather information and prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Submit report to the State or EPA Regional Office	0.00	0.82	0.32	0.20	1.34	\$69.81	\$0.00	\$6.21	656	879.04	\$49,869.12
Maintain a copy of each form for three years	0.00	0.00	0.01	0.02	0.03	\$0.87	\$0.00	\$0.00	13,051	391.53	\$11,354.37
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	6,561.57	\$311,057.38

EXHIBIT 1C
 2017 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Hazardous Waste Report											
Distribute Hazardous Waste Report forms and instructions	0.00	0.02	0.25	0.50	0.77	\$23.13	\$0.00	\$2.71	12,973	9,989.21	\$335,222.32
Assist respondents	0.00	0.02	0.50	0.50	1.02	\$32.73	\$0.00	\$0.00	12,973	13,232.46	\$424,606.29
Key entry of report submissions	0.00	0.02	0.17	0.25	0.44	\$13.93	\$0.00	\$0.00	14,040	6,177.60	\$195,577.20
Perform quality assurance	0.00	0.02	0.17	0.17	0.36	\$11.72	\$0.00	\$0.00	980,668	349,117.81	\$11,493,428.96
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	378,517.08	\$12,448,834.77

EXHIBIT 2A
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES *

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$147.36/ Year	Mgr. \$87.09/ Year	Tech. \$64.89/ Year	Cler. \$39.03/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	43	49.02	\$3,341.10
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	12	13.68	\$932.40
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	3	1.92	\$135.75
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	64.62	\$4,409.25
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	66	42.24	\$2,986.50
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	3	3.42	\$233.10
Re-Notification by SQGs under 40 CFR 262.18											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.08	0.70	0.08	0.86	\$55.51	\$0.00	\$4.09	0	0.00	\$0.00
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	13	8.32	\$588.25
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	13	1.04	\$40.56
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	3	0.24	\$9.36
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	2	0.16	\$6.24
Withdrawal from 40 CFR Part 262, Subpart K											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	191	122.24	\$8,642.75
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	191	15.28	\$595.92
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	147.28	\$9,883.08
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	372	424.08	\$28,904.40

EXHIBIT 2A (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$147.36/ Year	Mgr. \$87.09/ Year	Tech. \$64.89/ Year	Cler. \$39.03/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION 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	1.09	\$70.44	\$0.00	\$4.09	9,021	9,832.89	\$672,335.13
Subsequent Notification											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	38,708	24,773.12	\$1,751,537.00
Notification of Management of Hazardous Waste Pharmaceuticals under 40 CFR Part 266, Subpart P											
Healthcare Facilities											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	0	0.00	\$0.00
Reverse Distributors											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 266, Subpart P											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$3.12	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$70.44	\$0.00	\$4.09	83	90.47	\$6,185.99
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$32.15	\$0.00	\$4.09	28	14.00	\$1,014.72
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	942	602.88	\$42,625.50
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$32.15	\$0.00	\$4.09	314	157.00	\$11,379.36
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	864.35	\$61,205.57
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$70.44	\$0.00	\$4.09	73	79.57	\$5,440.69
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$32.15	\$0.00	\$4.09	24	12.00	\$869.76
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	447	286.08	\$20,226.75
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$32.15	\$0.00	\$4.09	149	74.50	\$5,399.76
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	452.15	\$31,936.96
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	36,604	\$2,563,431

EXHIBIT 2B
NOTIFICATION OF REGULATED WASTE ACTIVITY
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Complete and submit EPA Form 8700-12 prior to operating under exclusion(s)	0.00	0.10	0.94	0.10	1.14	\$44.96	\$0.00	\$4.09	2	2.28	\$98.10
Complete and submit EPA Form 8700-12 by March 1 of each even numbered year thereafter	0.00	0.10	0.94	0.10	1.14	\$44.96	\$0.00	\$4.09	0	0.00	\$0.00
Complete and submit EPA Form 8700-12 indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2.28	\$98.10
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.44	0.10	0.64	\$41.16	\$0.00	\$4.09	4	2.56	\$181.00
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	1	1.14	\$77.70
Re-notification by SQGs under 40 CFR 262.18											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.08	0.70	0.08	0.86	\$55.51	\$0.00	\$4.09	0	0.00	\$0.00
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	51	32.64	\$1,522.35
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$1.96	\$0.00	\$0.00	51	4.08	\$99.96
<i>Teaching Hospitals</i>											
Keep a copy of their formal written affiliation agreement with college or university on file while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$1.96	\$0.00	\$0.00	1	0.08	\$1.96
<i>Non-Profit Research Institutes</i>											
Keep a copy of the formal written affiliation agreement with a college or university on file at the non-profit research institute while its laboratories are subject to Subpart K	0.00	0.00	0.00	0.08	0.08	\$1.96	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 262, Subpart K											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	33	21.12	\$985.05
Keep a copy of the withdrawal notice on file	0.00	0.00	0.00	0.08	0.08	\$1.96	\$0.00	\$0.00	33	2.64	\$64.68
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	60.56	\$2,674.00
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L											
Complete and submit EPA Form 8700-12, as applicable	0.00	0.10	0.94	0.10	1.14	\$73.61	\$0.00	\$4.09	45	51.30	\$3,496.50

EXHIBIT 2B (continued)

NOTIFICATION OF REGULATED WASTE ACTIVITY

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION 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	1.09	\$42.81	\$0.00	\$4.09	1,400	1,526.00	\$65,660.00
Subsequent Notification											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	1,552	993.28	\$46,327.20
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,519.28	\$111,987.20
Notification of Management of Hazardous Waste Pharmaceuticals under 40 CFR Part 266, Subpart P											
Healthcare Facilities											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$3.12	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Reverse Distributors											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$3.12	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 266, Subpart P											
Prepare and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$3.12	\$0.00	\$4.09	0	0.00	\$0.00
Keep a copy of the notification on file	0.00	0.00	0.00	0.08	0.08	\$0.00	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$42.81	\$0.00	\$4.09	6	6.54	\$281.40
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$20.15	\$0.00	\$4.09	2	1.00	\$48.48
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	85	54.40	\$2,537.25
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$20.15	\$0.00	\$4.09	28	14.00	\$678.72
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	75.94	\$3,545.85

EXHIBIT 2B (continued)

NOTIFICATION OF REGULATED WASTE ACTIVITY

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg.	Mgr.	Tech.	Cler.	Respon.	Labor	Capital/		Number	Total	Total
	\$68.37/	\$64.18/	\$38.40/	\$24.49/	Hours/	Cost/	Startup	O & M	Respon./	Hours/	Cost/
INFORMATION COLLECTION ACTIVITY	Year	Year	Year	Year	Year	Year	Cost	Cost	Activ.	Year	Year

Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.08	0.93	0.08	1.09	\$42.81	\$0.00	\$4.09	2	2.18	\$93.80
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$20.15	\$0.00	\$4.09	1	0.50	\$24.24
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Complete and submit EPA Form 8700-12	0.00	0.10	0.44	0.10	0.64	\$25.76	\$0.00	\$4.09	22	14.08	\$656.70
<i>Letter</i>											
Prepare and submit letter requesting an EPA Identification Number	0.00	0.08	0.34	0.08	0.50	\$20.15	\$0.00	\$4.09	8	4.00	\$193.92
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	20.76	\$968.66
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,733.82	\$123,029.01

EXHIBIT 2C

NOTIFICATION OF REGULATED WASTE ACTIVITY

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Notification prior to operating under exclusion(s)											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	39	19.35	\$743.04
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	39	87.08	\$3,209.00
Notification by March 1 of each even numbered year thereafter											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	10	5.16	\$198.14
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	10	23.22	\$855.73
Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	3	1.29	\$49.54
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	3	5.81	\$213.93
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	141.91	\$5,269.38
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	70	35.00	\$1,344.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	70	157.50	\$5,804.40
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	4	2.00	\$76.80
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	4	9.00	\$331.68
Re-Notification by SQGs under 40 CFR 262.18											
Review completed EPA Form 8700-12	0.00	0.00	0.17	0.00	0.17	\$6.53	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	0.08	0.00	0.08	\$3.07	\$0.00	\$0.00	0	0.00	\$0.00
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	64	32.00	\$1,228.80
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	64	144.00	\$5,306.88
Withdrawal from 40 CFR Part 262, Subpart K											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	224	112.00	\$4,300.80
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	224	504.00	\$18,574.08
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	792.00	\$29,410.56
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	417	208.50	\$8,006.40
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	417	938.25	\$34,577.64

EXHIBIT 2C (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Waste Activity under RCRA Section 3010											
Initial Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	10,213	5,106.29	\$196,081.54
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	10,213	22,978.31	\$846,827.13
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$12.25	\$0.00	\$0.59	10,213	5,106.29	\$131,129.53
Subsequent Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$9.60	\$0.00	\$0.00	39,455	9,863.70	\$378,766.08
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	39,455	88,773.30	\$3,271,592.02
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	131,827.89	\$4,824,396.30
Notification of Management of Hazardous Waste Pharmaceuticals under 40 CFR Part 266, Subpart P											
Healthcare Facilities											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	0	0.00	\$0.00
Reverse Distributors											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 266, Subpart P											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	87	43.61	\$1,674.62
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	87	196.25	\$7,232.28
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$12.25	\$0.00	\$0.59	87	43.61	\$1,119.90
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	29	14.70	\$564.48
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	29	66.15	\$2,437.85
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$12.25	\$0.00	\$0.59	29	14.70	\$377.50
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$9.60	\$0.00	\$0.00	1,006	251.62	\$9,662.02
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	1,006	2,264.54	\$83,455.66
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	335	167.58	\$6,435.07
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	335	754.11	\$27,791.47
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	3,816.87	\$140,750.85

EXHIBIT 2C (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	74	36.75	\$1,411.20
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	74	165.38	\$6,094.62
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$12.25	\$0.00	\$0.59	74	36.75	\$943.74
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	25	12.25	\$470.40
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	25	55.13	\$2,031.54
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.00	0.50	0.50	\$12.25	\$0.00	\$0.59	25	12.25	\$314.58
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$9.60	\$0.00	\$0.00	460	114.91	\$4,412.35
Enter EPA Form 8700-12 information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	460	1,034.15	\$38,111.69
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.50	0.00	0.50	\$19.20	\$0.00	\$0.00	154	76.93	\$2,954.11
Enter letter information into database	0.00	0.00	2.00	0.25	2.25	\$82.92	\$0.00	\$0.00	154	346.19	\$12,758.07
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,890.69	\$69,502.30
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	139,819.61	\$5,119,470.31

EXHIBIT 3A

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION
 ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - PRIVATE FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$147.36/ Year	Mgr. \$87.09/ Year	Tech. \$64.89/ Year	Cler. \$39.03/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Part A Permit Application											
Contents of the Part A Permit Application											
Read the regulations and instructions	2.38	1.18	3.57	0.00	7.13	\$685.14	\$0.00	\$0.00	3	21.39	\$2,055.42
Prepare the Site Identification Form	0.00	0.08	0.69	0.17	0.94	\$58.38	\$0.00	\$0.00	3	2.82	\$175.14
Prepare the Hazardous Waste Permit Information Form and reports	1.67	3.28	8.83	1.67	15.45	\$1,169.91	\$0.00	\$0.00	3	46.35	\$3,509.73
Signatories to Permit Applications and Permit Application Reports											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$147.47	\$0.00	\$0.00	3	7.50	\$442.41
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$127.95	\$0.00	\$0.00	1	2.00	\$127.95
Submittal of Part A Permit Application											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$166.98	\$0.00	\$6.21	3	9.00	\$519.57
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.77	3.07	1.53	5.37	\$325.99	\$0.00	\$0.00	1	5.37	\$325.99
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	94.43	\$7,156.21
Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$216.87	\$0.00	\$0.00	7	21.00	\$1,518.09
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$216.87	\$0.00	\$0.00	14	42.00	\$3,036.18
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$566.34	\$0.00	\$6.21	7	47.25	\$4,007.85
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$566.34	\$0.00	\$6.21	14	94.50	\$8,015.70
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$403.26	\$0.00	\$6.21	7	35.00	\$2,866.29
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$403.26	\$0.00	\$6.21	7	35.00	\$2,866.29
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	274.75	\$22,310.40
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	369.18	\$29,466.61

EXHIBIT 3B

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE AND LOCAL GOVERNMENT FACILITIES ^a

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Part A Permit Application											
Contents of the Part A Permit Application											
Read the regulations and instructions	2.38	1.18	3.57	0.00	7.13	\$375.54	\$0.00	\$0.00	0	0.00	\$0.00
Prepare the Site Identification Form	0.00	0.08	0.69	0.17	0.94	\$35.79	\$0.00	\$0.00	0	0.00	\$0.00
Prepare the Hazardous Waste Permit Information Form and reports	1.67	3.28	8.83	1.67	15.45	\$704.66	\$0.00	\$0.00	0	0.00	\$0.00
Signatories to Permit Applications and Permit Application Reports											
Obtain signatures and certifications for Part A permit applications, reports, and other information requested by EPA	0.00	0.50	1.00	1.00	2.50	\$94.98	\$0.00	\$0.00	0	0.00	\$0.00
Obtain a new authorization for invalid authorizations	0.00	0.50	1.00	0.50	2.00	\$82.74	\$0.00	\$0.00	0	0.00	\$0.00
Submittal of Part A Permit Application											
Submit Part A Permit Application and reports	0.00	0.50	1.00	1.50	3.00	\$107.23	\$0.00	\$6.21	0	0.00	\$0.00
Explain or cure an alleged deficiency in Part A application, if required	0.00	0.77	3.07	1.53	5.37	\$204.78	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations											
Read the regulations and instructions (for Agency rulemaking)	0.00	1.00	2.00	0.00	3.00	\$140.98	\$0.00	\$0.00	0	0.00	\$0.00
Read the regulations and instructions (for facility modification)	0.00	1.00	2.00	0.00	3.00	\$140.98	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit revised Part A (for rulemaking)	1.75	1.40	1.78	1.82	6.75	\$322.42	\$0.00	\$6.21	0	0.00	\$0.00
Prepare and submit revised Part A (for facility modification)	1.75	1.40	1.78	1.82	6.75	\$322.42	\$0.00	\$6.21	0	0.00	\$0.00
Prepare and submit justifications for changes, if needed	1.00	1.00	2.00	1.00	5.00	\$233.84	\$0.00	\$6.21	0	0.00	\$0.00
Submit Subpart H compliance demonstrations, if needed	1.00	1.00	2.00	1.00	5.00	\$233.84	\$0.00	\$6.21	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

EXHIBIT 3C

PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - STATE GOVERNMENT AGENCIES ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$68.37/ Year	Mgr. \$64.18/ Year	Tech. \$38.40/ Year	Cler. \$24.49/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Part A Permit Application											
Review Part A Permit Applications	0.00	0.00	4.00	0.33	4.33	\$161.68	\$0.00	\$0.00	3	12.99	\$485.04
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.33	0.00	0.33	\$12.67	\$0.00	\$0.00	3	0.99	\$38.01
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.33	0.00	0.33	\$12.67	\$0.00	\$0.00	1	0.33	\$12.67
Review signature certifications	0.00	0.00	0.33	0.00	0.33	\$12.67	\$0.00	\$0.00	3	0.99	\$38.01
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.50	1.50	\$36.74	\$0.00	\$0.00	3	4.50	\$110.22
Notify applicant of deficiency in the Part A Permit Application	0.00	0.00	1.00	0.23	1.23	\$44.03	\$0.00	\$0.00	1	1.23	\$44.03
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	21.03	\$727.98
Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations											
Review revised Part A Permit Application	0.00	0.00	4.00	0.33	4.33	\$161.68	\$0.00	\$0.00	21	90.93	\$3,395.28
Enter revised Part A Permit Application information into RCRAInfo Database	0.00	0.00	0.00	1.50	1.50	\$36.74	\$0.00	\$0.00	21	31.50	\$771.54
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$79.03	\$0.00	\$0.00	7	10.50	\$553.21
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$79.03	\$0.00	\$0.00	7	10.50	\$553.21
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	143.43	\$5,273.24
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	164.46	\$6,001.22

EXHIBIT 4
 2019 HAZARDOUS WASTE REPORT
 ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$95.02/ Year	Mgr. \$83.84/ Year	Tech. \$60.32/ Year	Cler. \$25.73/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Hazardous Waste Report											
Develop Hazardous Waste Report forms and instructions	0.00	8.00	80.00	20.00	108.00	\$6,010.92	\$0.00	\$23,709.00	0.50	54.00	\$14,859.96
Distribute Hazardous Waste Report forms and instructions	0.00	0.02	0.25	0.50	0.77	\$29.62	\$0.00	\$0.00	209	160.93	\$6,190.58
Develop computer capabilities required to compile national data	0.00	8.00	80.00	0.00	88.00	\$5,496.32	\$0.00	\$296,367.00	0.50	44.00	\$150,931.66
Assist respondents	0.00	0.02	0.38	0.38	0.78	\$34.38	\$0.00	\$0.00	209	163.02	\$7,185.42
Key entry of report submissions	0.00	0.02	0.07	0.22	0.31	\$11.56	\$0.00	\$0.00	178	55.18	\$2,057.68
Perform quality assurance	0.00	0.02	0.17	0.18	0.37	\$16.23	\$0.00	\$0.00	2,861	1,047.13	\$46,434.03
Prepare the National Report	0.00	8.00	200.00	40.00	248.00	\$13,763.92	\$0.00	\$59,273.00	0.50	124.00	\$36,518.46
Store the data	0.00	0.00	80.00	0.00	80.00	\$4,825.60	\$0.00	\$41,492.00	0.50	40.00	\$23,158.80
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,688.26	\$287,336.59

EXHIBIT 5
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$95.02/ Year	Mgr. \$83.84/ Year	Tech. \$60.32/ Year	Cler. \$25.73/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Secondary Material Activity under 40 CFR 260.42											
Notification prior to operating under exclusion(s)											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	6	1.58	\$95.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	6	9.39	\$529.20
Notification by March 1 of each even numbered year thereafter											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	2	0.42	\$25.33
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	2	2.50	\$141.12
Notification indicating that the hazardous secondary materials are no longer managed in accordance with the exclusion											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.11	\$6.33
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.63	\$35.28
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	14.63	\$832.26
Notification of Closure by an LQG under 40 CFR 262.17(a)(8)											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Notification of Consolidation of VSQG Hazardous Waste by an LQG under 40 CFR 262.17(f)											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Notification of Hazardous Waste Activity under 40 CFR Part 262, Subpart K											
Intent to Comply with Subpart K and Recordkeeping of Agreements											
<i>Eligible Academic Entities</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 262, Subpart K											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Notification of the Use of Alternatives Standards for Episodic Generation under 40 CFR Part 262, Subpart L											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00

EXHIBIT 5 (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$95.02/ Year	Mgr. \$83.84/ Year	Tech. \$60.32/ Year	Cler. \$25.73/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Hazardous Waste Activity under RCRA Section 3010											
Initial Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	208	52.11	\$3,142.97
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$84.60	\$0.00	\$0.00	208	312.63	\$17,632.33
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$11.50	\$0.00	\$0.59	208	87.54	\$2,519.80
Subsequent Notification											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	805	201.30	\$12,142.42
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	805	1,199.75	\$67,636.80
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,853.33	\$103,074.32
Notification of Management of Hazardous Waste Pharmaceuticals under 40 CFR Part 266, Subpart P											
Healthcare Facilities											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Reverse Distributors											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Withdrawal from 40 CFR Part 266, Subpart P											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	0	0.00	\$0.00
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Notification of Universal Waste Activity under 40 CFR Part 273, Subpart C											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	2	0.45	\$26.84
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$84.60	\$0.00	\$0.00	2	2.67	\$150.59
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$11.50	\$0.00	\$0.59	2	0.75	\$21.52
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	1	0.15	\$9.05
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$84.60	\$0.00	\$0.00	1	0.90	\$50.76
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$11.50	\$0.00	\$0.59	1	0.25	\$7.25
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	21	5.14	\$309.74
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	21	30.60	\$1,725.36
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	7	1.71	\$103.15
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	7	10.19	\$574.56
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	52.81	\$2,978.82

EXHIBIT 5 (continued)
 NOTIFICATION OF REGULATED WASTE ACTIVITY
 ESTIMATED ANNUAL FEDERAL AGENCY HOUR AND COST BURDEN ^a

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$95.02/ Year	Mgr. \$83.84/ Year	Tech. \$60.32/ Year	Cler. \$25.73/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Notification of Used Oil Activity under 40 CFR Part 279											
Initial Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	2	0.38	\$22.62
Enter EPA Form 8700-12 information into database	0.00	0.00	1.33	0.17	1.50	\$84.60	\$0.00	\$0.00	2	2.25	\$126.90
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$11.50	\$0.00	\$0.59	2	0.63	\$18.14
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	1	0.13	\$7.54
Enter letter information into database	0.00	0.00	1.33	0.17	1.50	\$84.60	\$0.00	\$0.00	1	0.75	\$42.30
Generate EPA Identification Number and send EPA Identification Number to facility	0.00	0.00	0.02	0.40	0.42	\$11.50	\$0.00	\$0.59	1	0.21	\$6.05
Subsequent Notification											
<i>EPA Form 8700-12</i>											
Review completed EPA Form 8700-12	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	9	2.35	\$141.45
Enter EPA Form 8700-12 information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	9	13.98	\$787.92
<i>Letter</i>											
Review letter requesting EPA Identification Number	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	3	0.79	\$47.35
Enter letter information into database	0.00	0.00	1.32	0.17	1.49	\$84.00	\$0.00	\$0.00	3	4.68	\$263.76
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	26.15	\$1,464.03
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,946.92	\$108,349.43

**EXHIBIT 6
PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION
ESTIMATED ANNUAL EPA HOUR AND COST BURDEN ^a**

	Hours and Costs Per Agency Activity								Total Hours and Costs		
	Leg. \$95.02/ Year	Mgr. \$83.84/ Year	Tech. \$60.32/ Year	Cler. \$25.73/ Year	Agency Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number Respon./ Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Part A Permit Application											
Review Part A Permit Applications	0.00	0.00	3.00	0.25	3.25	\$187.39	\$0.00	\$0.00	3	9.75	\$562.17
Ensure that Part A Permit Application and Reports have been signed by appropriate person	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	3	0.75	\$45.24
Review newly authorized signatures when a different individual or position gains responsibility for the overall operation of a facility	0.00	0.00	0.32	0.00	0.32	\$19.30	\$0.00	\$0.00	1	0.32	\$19.30
Review signature certifications	0.00	0.00	0.25	0.00	0.25	\$15.08	\$0.00	\$0.00	3	0.75	\$45.24
Enter Part A Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$25.73	\$0.00	\$0.00	3	3.00	\$77.19
Notify applicant of deficiency in the Part A Application	0.00	0.00	0.63	0.18	0.81	\$42.63	\$0.00	\$0.00	1	0.81	\$42.63
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	15.38	\$791.77
Revised Part A Permit Applications and Associated Justifications and Subpart H Compliance Demonstrations											
Review revised Part A Permit Application	0.00	0.00	3.00	0.25	3.25	\$187.39	\$0.00	\$0.00	21	68.25	\$3,935.19
Enter revised Part A Permit Application information into RCRAInfo Database	0.00	0.00	0.00	1.00	1.00	\$25.73	\$0.00	\$0.00	21	21.00	\$540.33
Review justifications for changes	0.5	0.25	0.75	0	1.50	\$113.71	\$0.00	\$0.00	7	10.50	\$795.97
Review Subpart H compliance demonstrations	0.5	0.25	0.75	0	1.50	\$113.71	\$0.00	\$0.00	7	10.50	\$795.97
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	110.25	\$6,067.46
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	125.63	\$6,859.23

EXHIBIT 7

2019 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION
 TOTAL ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN SUMMARY ^a

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
Private Facilities					
Hazardous Waste Report (Exhibit 1A)	244,611	\$16,979,248.38	\$0.00	\$77,625.00	\$17,056,873.38
Notification of Regulated Waste Activity (Exhibit 2A)	36,604	\$2,356,918.71	\$0.00	\$206,512.28	\$2,563,430.99
Part A Hazardous Waste Permit Application and Modification (Exhibit 3A)	369	\$29,230.63	\$0.00	\$235.98	\$29,466.61
<i>Subtotal</i>	<i>281,584.23</i>	<i>\$19,365,397.72</i>	<i>\$0.00</i>	<i>\$284,373.26</i>	<i>\$19,649,770.98</i>
State and Local Government Facilities					
Hazardous Waste Report (Exhibit 1B)	6,562	\$306,983.62	\$0.00	\$4,073.76	\$311,057.38
Notification of Regulated Waste Activity (Exhibit 2B)	2,734	\$109,769.23	\$0.00	\$13,259.78	\$123,029.01
Part A Hazardous Waste Permit Application and Modification (Exhibit 3B)	0	\$0.00	\$0.00	\$0.00	\$0.00
<i>Subtotal</i>	<i>9,295.39</i>	<i>\$416,752.85</i>	<i>\$0.00</i>	<i>\$17,333.54</i>	<i>\$434,086.39</i>
State Agencies					
Hazardous Waste Report (Exhibit 1C)	378,517	\$12,413,677.94	\$0.00	\$35,156.83	\$12,448,834.77
Notification of Regulated Waste Activity (Exhibit 2C)	139,820	\$5,113,318.28	\$0.00	\$6,152.06	\$5,119,470.34
Part A Hazardous Waste Permit Application and Modification (Exhibit 3C)	164	\$6,001.22	\$0.00	\$0.00	\$6,001.22
<i>Subtotal</i>	<i>518,501.15</i>	<i>\$17,532,997.44</i>	<i>\$0.00</i>	<i>\$41,308.89</i>	<i>\$17,574,306.33</i>
All Respondents					
Hazardous Waste Report	629,690	\$29,699,909.94	\$0.00	\$116,855.59	\$29,816,765.53
Notification of Regulated Waste Activity	179,158	\$7,580,006.22	\$0.00	\$225,924.12	\$7,805,930.34
Part A Hazardous Waste Permit Application and Modification	533.64	\$35,231.85	\$0.00	\$235.98	\$35,467.83
Total	809,381	\$37,315,148	\$0	\$343,016	\$37,658,164

EXHIBIT 8

**2019 HAZARDOUS WASTE REPORT, NOTIFICATION OF REGULATED WASTE ACTIVITY, AND PART A HAZARDOUS WASTE PERMIT APPLICATION AND MODIFICATION
TOTAL ESTIMATED ANNUAL EPA HOUR AND COST BURDEN SUMMARY ^a**

Information Collection Requirement	Total Hours per Year	Total Labor Cost per Year	Annual Capital/Startup Costs	Annual O & M Costs	Total Cost per Year
Hazardous Waste Report (Exhibit 4)	1,688.26	\$76,916.09	\$0.00	\$210,420.50	\$287,336.59
Notification of Regulated Waste Activity (Exhibit 5)	1,947	\$108,223.87	\$0.00	\$125.56	\$108,349.43
Part A Hazardous Waste Permit Application and Modification (Exhibit 6)	125.63	\$6,859.23	\$0.00	\$0.00	\$6,859.23
Total	3,761	\$191,999	\$0	\$210,546	\$402,545