

EXHIBIT 1
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
GENERAL FACILITY OPERATING STANDARDS

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent or Activity							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
Foreign Shipment Import Report (264.12(a) and 265.12(a))											
Read the regulations	34	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	33.96	\$2,130.31
Collect Data	34	0	0.00	0.00	0.75	0.25	\$52.03	\$0.00	\$0.00	33.96	\$1,767.02
Prepare and submit notification	34	0	0.00	0.25	0.50	0.25	\$56.97	\$0.00	\$0.33	33.96	\$1,945.99
Subtotal	34	0	0.00	0.50	2.00	0.50	\$171.74	\$0.00	\$0.33	101.88	\$5,843.33
Notice of appropriate permit(s) (264.12(b))											
Read the regulations	68	N/A	0.00	0.10	0.25	0.00	\$22.20	\$0.00	\$0.00	23.65	\$1,500.00
Prepare, keep records of, and submit notice (55 annually)	68	N/A	0.00	0.13	0.25	0.13	\$28.49	\$0.00	\$0.33	1,857.90	\$107,075.42
Subtotal	68	N/A	0.00	0.23	0.50	0.13	\$50.69	\$0.00	\$0.33	1,881.55	\$108,575.42
Notice of Part 264 or 265 and Part 270 requirements (264.12(c) and 265.12(b))											
Read the regulations	11	0	0.00	0.10	0.25	0.00	\$22.20	\$0.00	\$0.00	3.99	\$253.33
Prepare and submit notice	11	0	0.00	0.00	0.50	0.13	\$33.41	\$0.00	\$0.33	7.19	\$385.02
Subtotal	11	0	0.00	0.10	0.75	0.13	\$55.62	\$0.00	\$0.33	11.18	\$638.35
Waste Analysis (264.13(a)(1) and 265.13(a)(1))											
<i>Non-commercial facilities</i>											
Read the regulations	245	2	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	247.00	\$15,494.31
Collect data (twice annually)	245	2	0.00	0.00	3.00	0.50	\$190.75	\$0.00	\$0.00	1,729.00	\$94,230.50
Perform waste analysis (twice annually)	245	2	0.00	0.00	10.00	0.00	\$577.90	\$0.00	\$750.00	4,940.00	\$655,982.60
<i>Commercial facilities</i>											
Read the regulations	318	1	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	319.00	\$20,010.87
Collect data (50 times annually)	318	1	0.00	0.00	1.50	0.25	\$95.38	\$0.00	\$0.00	27,912.50	\$1,521,231.25
Perform waste analysis (50 times annually)	318	1	0.00	0.00	20.00	0.00	\$1,155.80	\$0.00	\$400.00	319,000.00	\$24,815,010.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	354,147.50	\$27,121,959.53
Waste Analysis Plan (264.13(b) and 265.13(b))											
Read the regulations	N/A	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	0.00	\$0.00
Collect data	N/A	0	0.00	0.00	10.00	0.00	\$577.90	\$0.00	\$0.00	0.00	\$0.00
Write the waste analysis plan	N/A	0	0.00	10.00	60.00	0.50	\$4,260.28	\$0.00	\$0.00	0.00	\$0.00
Maintain the waste analysis plan	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	0.00	\$0.00
Modify the waste analysis plan	113	1	0.00	10.00	80.00	0.50	\$5,416.08	\$0.00	\$0.00	10,244.60	\$613,100.26
Maintain the modified waste analysis plan	113	1	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	113.20	\$3,934.83
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	10,357.80	\$617,035.09
Inspection Schedule (264.15(b)(1) and 265.15(b)(1))											
Read the regulations	N/A	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	0.00	\$0.00
Develop an inspection schedule	N/A	0	0.00	8.00	80.00	1.00	\$5,278.36	\$0.00	\$0.00	0.00	\$0.00
Maintain the inspection schedule	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	0.00	\$0.00
Modify the inspection schedule	563	4	0.00	0.00	8.00	0.00	\$462.32	\$0.00	\$0.00	4,536.00	\$262,135.44
Maintain the modified inspection schedule	563	4	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	567.00	\$19,708.92
Record problems in the inspection log	563	3	0.00	0.00	100.00	0.00	\$5,779.00	\$0.00	\$0.00	56,600.00	\$3,270,914.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	61,703.00	\$3,552,758.36

Personnel Training (264.16(d) and 265.16(d))											
Read the regulations	8	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	8.00	\$501.84
Collect data	8	0	0.00	0.50	2.00	0.50	\$171.74	\$0.00	\$0.00	24.00	\$1,373.88
Maintain training records (new facilities)	8	0	0.00	0.00	0.00	80.00	\$2,780.80	\$0.00	\$0.00	640.00	\$22,246.40
Maintain training records (existing facilities)	563	3	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$0.00	2,264.00	\$78,696.64
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,936.00	\$102,818.76
Documentation of Compliance for Ignitable, Reactive, or Incompatible Wastes (264.17)											
Read the regulations	225	N/A	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	225.20	\$14,126.80
Collect and document data	225	N/A	0.00	1.00	40.00	1.00	\$2,423.91	\$0.00	\$0.00	9,458.40	\$545,864.53
Maintain documentation at the facility	225	N/A	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	225.20	\$7,827.95
Subtotal	225	N/A	0.00	1.25	40.75	2.00	\$2,521.40	\$0.00	\$0.00	9,908.80	\$567,819.28
Construction Quality Assurance Plan (265.19)											
Read the regulations	N/A	0	0.00	0.00	1.00	0.00	\$57.79	\$0.00	\$0.00	0.00	\$0.00
Complete the data items of 265.19(b), and, if applicable, an alternative demonstration	N/A	0	0.00	0.00	15.00	5.00	1040.65	\$0.00	\$0.00	0.00	\$0.00
Obtain a certification from CQA officer	N/A	0	0.00	0.00	1.00	0.00	\$57.79	\$0.00	\$0.00	0.00	\$0.00
Submit materials to EPA	N/A	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$3.20	0.00	\$0.00
Maintain records of materials	N/A	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	0.00	\$0.00
Subtotal	N/A	0	0.00	0.00	17.00	6.50	\$1,208.37	\$0.00	\$3.20	0.00	\$0.00
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	441,047.71	\$32,077,448.12

EXHIBIT 2
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
OPERATING RECORD

	Number of Respondents		Hours and Costs per Respondent or Activity							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/ Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
INFORMATION COLLECTION ACTIVITY											
Arrangements with Local Authorities (264.37(b) and 265.37(b))											
Document refusal of State or local authorities to enter into arrangements	6	0	0.00	0.25	1.00	0.50	\$94.56	\$0.00	\$0.00	9.91	\$535.20
Determine Quantity of Waste (264.73 and 265.73(b)(1) & (b)(2))											
Maintain updated information in operating record	563	3	0.00	0.00	40.00	40.00	\$3,702.00	\$0.00	\$0.00	45,280	\$2,095,332.00
Records and Results of Waste Analysis (264.73 and 265.73(b)(3))											
Maintain updated information in operating record	563	3	0.00	0.00	0.00	20.00	\$695.20	\$0.00	\$0.00	11,320	\$393,483.20
Emergency Reports (264.73 and 265.73(b)(4))											
Maintain updated information in operating record	6	0	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$0.00	22.64	\$786.97
Inspections (264.73 and 265.73(b)(5))											
Maintain updated information in operating record	1,126	8	0.00	0.00	4.00	20.00	\$926.36	\$0.00	\$0.00	27,216	\$1,050,492.24
Monitoring, Testing, or Analytical Data and Corrective Action (264.73 and 265.73(b)(6))											
Maintain updated information in operating record	451	5	0.00	0.00	2.00	10.00	\$463.18	\$0.00	\$0.00	5,472	\$211,210.08
Notices to Generators (264.73 and 265.73(b)(7))											
Maintain updated information in operating record	68	0	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$0.00	135.84	\$4,721.80
Closure Cost Estimates (264.73 and 265.73(b)(8))											
Maintain updated information in operating record	1,133	8	0.00	0.00	0.00	0.25	\$8.69	\$0.00	\$0.00	285.25	\$9,915.29
Post-Closure Cost Estimates (264.73 and 265.73(b)(8))											
Maintain updated information in operating record	47	1	0.00	0.00	0.00	0.25	\$8.69	\$0.00	\$0.00	12	\$417.12

Certification (264.73 and 265.73(b)(9))											
Maintain updated information in operating record	563	3	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$0.00	1,132	\$39,348.32
Records of waste disposed under an extension to effective date of the LDRs and notice required by generator under 268.7(a) (264.73 and 265.73(b)(10))											
Maintain updated information in operating record	47	1	0.00	0.00	1.00	2.00	\$127.31	\$0.00	\$0.00	144	\$6,110.88

Copy of notice, certification, and demonstration required by generator: Off-site treatment, storage, and disposal facilities (264.73 and 265.73(b)(11), (b)(13), and (b)(15))											
Maintain updated information in operating record	28	0	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$0.00	56.6	\$1,967.42
Information in the notice, certification and demonstration required by generator or owner or operator: On-site treatment, storage, and disposal facilities (264.73 and 265.73(b)(12), (b)(14), and (b)(16))											
Maintain updated information in operating record	535	3	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$0.00	1,075.4	\$37,380.90
File Storage Systems for Recordkeeping											
Purchase file cabinets	1,133	8	0.00	0.00	0.00	0.00	\$0.00	\$180.83	\$0.00	0.00	\$206,329.34
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	92,161.64	\$4,058,030.75

EXHIBIT 3
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
CONTINGENCY PLAN AND EMERGENCY PROCEDURES

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent or Activity							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/ Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
Prepare and Submit Contingency Plan (265.50 - .54)											
Read the regulations	7	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	0.00	\$0.00
Collect information required to develop or modify the contingency plan	7	0	0.00	0.00	12.00	3.00	\$797.76	\$0.00	\$0.00	0.00	\$0.00
Develop the contingency plan	7	0	0.00	1.00	60.00	4.00	\$3,683.99	\$0.00	\$0.00	0.00	\$0.00
Submit contingency plan to local authorities	7	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$3.20	3.50	\$144.06
Maintain the contingency plan	7	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	7.00	\$243.32
Subtotal	0	0	0.00	1.25	72.75	8.50	\$4,596.62	\$0.00	\$3.20	10.50	\$387.38
Emergency Coordinator Reports (264.56(a)(2), (d)(1), and (d)(2)), and 265.56(a)(2), (d)(1), and (d)(2))											
Notify State and local authorities of an imminent or actual emergency situation	11	0	0.00	0.50	0.00	0.00	\$38.78	\$0.00	\$0.00	5.71	\$442.42
Collect information required for an emergency report	11	0	0.00	0.00	2.50	0.50	\$161.86	\$0.00	\$0.00	34.23	\$1,846.77
Notify local authorities of the need to evacuate local areas	0	0	0.00	1.00	0.00	0.00	\$77.55	\$0.00	\$0.00	0.11	\$8.85
Submit an emergency report to the on-scene coordinator or the National Response Center	11	0	0.00	1.00	0.00	0.00	\$77.55	\$0.00	\$3.20	11.41	\$921.36
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	51.46	\$3,219.39
Notify Regional Administrator that facility is in compliance with 264.56(h) or 265.56(h) before resuming operations in the affected area (264.56(i) and 265.56(i))											
Compile information that demonstrates that all affected areas are in compliance with 264.56(h) or 265.56(h)	11	0	0.00	0.00	2.50	0.50	\$161.86	\$0.00	\$0.00	34.23	\$1,846.77
Prepare and submit notification letter	11	0	0.00	0.25	1.50	0.25	\$114.76	\$0.00	\$0.33	22.82	\$1,313.21
Subtotal	11	0	0.00	0.25	4.00	0.75	\$276.62	\$0.00	\$0.33	57.05	\$3,159.97
Prepare an Owner/Operator's Emergency Report (264.56(j) and 265.56(j))											
Read the regulations	11	0	0.00	0.25	0.75	0.00	\$62.73	\$0.00	\$0.00	11.41	\$715.75
Collect information required in the emergency report	11	0	0.00	0.00	8.00	0.50	\$479.70	\$0.00	\$0.00	96.99	\$5,473.38
Prepare and submit the emergency report	11	0	0.00	0.25	4.00	0.50	\$267.93	\$0.00	\$3.20	54.20	\$3,093.56
Subtotal	11	0	0.00	0.50	12.75	1.00	\$810.36	\$0.00	\$3.20	162.59	\$9,282.69
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	281.60	\$16,049.44

EXHIBIT 4
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
CLOSURE AND POST-CLOSURE REQUIREMENTS

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent or Activity							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
Closure Plan (265.112(a))											
Read the regulations	N/A	0	0.00	0.50	3.00	0.00	\$212.15	\$0.00	\$0.00	0.00	\$0.00
Conduct an inventory of hazardous waste	N/A	0	0.00	0.00	8.00	0.00	\$462.32	\$0.00	\$0.00	0.00	\$0.00
Record results of inventory	N/A	0	0.00	0.00	2.00	0.50	\$132.96	\$0.00	\$0.00	0.00	\$0.00
Write descriptions for activities	N/A	0	0.00	1.00	20.00	3.00	\$1,337.63	\$0.00	\$0.00	0.00	\$0.00
Estimate final closure	N/A	0	0.00	0.25	0.25	0.00	\$33.84	\$0.00	\$0.00	0.00	\$0.00
Write the closure schedule	N/A	0	0.00	0.50	1.00	0.50	\$113.95	\$0.00	\$0.00	0.00	\$0.00
Subtotal	N/A	0	0.00	2.25	34.25	4.00	\$2,292.84	\$0.00	\$0.00	0.00	\$0.00
Notification and Amendment of Closure Plan (265.112(c))											
Prepare and submit notification of amendment	N/A	0	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$0.33	0.23	\$12.93
Amend and submit closure plan	N/A	0	0.00	0.00	8.00	1.00	\$497.08	\$0.00	\$3.20	1.35	\$75.04
Subtotal	N/A	0	0.00	0.25	9.00	1.25	\$582.95	\$0.00	\$3.53	1.58	\$87.97
Notification of Partial or Final Closure (264.112(d) and 265.112(d))											
Prepare and submit notification of closure	7	0	0.00	0.25	0.50	0.25	\$56.97	\$0.00	\$0.33	7.00	\$401.12
Submit closure plan	7	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	7.00	\$265.72
Subtotal	7	0	0.00	0.25	0.50	1.25	\$91.73	\$0.00	\$3.53	14.00	\$666.84
Extension and Allowances During the Closure Period (264.113(a), 265.113(a), 264.113(b), 265.113(b), 264.113(d), and 265.113(d))											
Prepare and submit demonstration for extension for treatment, storage, or removal of hazardous waste (264/265.113(a))	1	0	0.00	4.00	80.00	1.00	\$4,968.16	\$0.00	\$3.20	119.00	\$6,959.90
Prepare and submit demonstration for extension of the closure period (264/265.113(b))	1	0	0.00	4.00	80.00	1.00	\$4,968.16	\$0.00	\$3.20	119.00	\$6,959.90
Prepare and submit demonstration for receiving non-hazardous waste (264/265.113(d))	0	0	0.00	4.00	100.00	1.00	\$6,123.96	\$0.00	\$3.20	36.75	\$2,144.51
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	274.75	\$16,064.31
Certification of Closure (264.115 and 265.115)											
Have an independent registered professional engineer inspect the facility	7	0	0.00	0.00	1.00	0.00	\$57.79	\$0.00	\$1,000.00	7.00	\$7,404.53
Collect documentation to support certification and submit certification	7	0	0.00	0.00	3.00	2.00	\$242.89	\$0.00	\$9.20	35.00	\$1,764.63
Subtotal	7	0	0.00	0.00	4.00	2.00	\$300.68	\$0.00	\$1,009.20	42.00	\$9,169.16

Survey Plat (264.116 and 265.116)											
Have a professional land surveyor prepare and certify plat, and submit plat	1	0	0.00	0.00	1.00	2.00	\$127.31	\$0.00	\$750.00	1.50	\$438.66
Subtotal	1	0	0.00	0.00	1.00	2.00	\$127.31	\$0.00	\$750.00	1.50	\$438.66
Post-Closure Plan (265.118)											
Read the regulations	N/A	0	0.00	0.50	3.00	0.00	\$212.15	\$0.00	\$0.00	0.00	\$0.00
Collect data	N/A	0	0.00	1.00	12.00	7.00	\$1,014.35	\$0.00	\$0.00	0.00	\$0.00
Write and submit post-closure plan	N/A	0	0.00	1.00	20.00	2.00	\$1,302.87	\$0.00	\$3.20	0.00	\$0.00
Maintain post-closure plan	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00

Notification and Amendment of Post-Closure Plan Under 265.118(a)(1)-(3)											
Prepare and submit notification of amendment	N/A	0	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$0.33	0.00	\$0.00
Prepare and submit amended post-closure plan	N/A	0	0.00	0.00	8.00	1.00	\$497.08	\$0.00	\$3.20	0.00	\$0.00
Subtotal	N/A	0	0.00	0.25	9.00	1.25	\$582.95	\$0.00	\$3.53	0.00	\$0.00
Amendment of Post-Closure Plan Under 265.118(d)(4), (f), and (g)(1)											
Amend and submit post-closure plan as requested by EPA (265.118(d)(4))	N/A	0	0.00	0.50	6.00	1.50	\$437.66	\$0.00	\$3.20	0.00	\$0.00
Modify and resubmit plan, if not approved by EPA (265.118(f))	N/A	0	0.00	0.50	6.00	2.00	\$455.04	\$0.00	\$3.20	0.00	\$0.00
Petition to extend or reduce the post-closure care period (265.118(g)(1))	N/A	0	0.00	0.50	1.00	0.50	\$113.95	\$0.00	\$3.20	0.00	\$0.00
Subtotal	N/A	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$0.00
Hazardous Waste Disposal Records (264.119 and 265.119(a))											
Determine specifications of hazardous waste activity	1	0	0.00	0.00	2.00	0.00	\$115.58	\$0.00	\$0.00	2.00	\$115.58
Establish and submit a record of activity	1	0	0.00	0.00	1.00	0.00	\$57.79	\$0.00	\$3.20	1.00	\$60.99
Maintain the record of activity	1	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	1.00	\$34.76
Subtotal	1	0	0.00	0.00	3.00	1.00	\$208.13	\$0.00	\$3.20	4.00	\$211.33
Hazardous Waste Notation Certification											
Record notation on deed, and develop and submit certification	1	0	1.00	0.00	1.00	2.00	\$258.51	\$0.00	\$0.33	4.00	\$258.84
Subtotal	1	0	0.00	0.00	1.00	2.00	\$258.51	\$0.00	\$0.33	4.00	\$258.84
Post-Closure Plan Modifications (265.119(c))											
Prepare request for modification	N/A	0	0.00	0.50	1.25	0.25	\$119.70	\$0.00	\$0.00	0.00	\$0.00
Demonstrate compliance	N/A	0	0.00	0.25	1.75	1.00	\$155.28	\$0.00	\$0.00	0.00	\$0.00
Subtotal	N/A	0	0.00	0.75	3.00	1.25	\$274.98	\$0.00	\$0.00	0.00	\$0.00
Certification of Completion of Post-Closure Care (264.120 and 265.120)											
Obtain certification of compliance from an independent registered professional engineer	0	0	0.00	1.00	4.00	0.00	\$308.71	\$0.00	\$1,000.00	0.00	\$0.00
Maintain a copy of the certification	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.00	0.00	\$0.00
Submit documentation to EPA	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	0.00	\$0.00
Subtotal	0	0	0.00	1.00	4.00	2.00	\$378.23	\$0.00	\$1,003.20	0.00	\$0.00
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	341.83	\$26,897.11

EXHIBIT 5
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
FINANCIAL REQUIREMENTS

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
Reading the Regulations											
Read the regulations covering financial responsibility requirements (new facilities)	8	0	8.00	2.00	8.00	0.00	\$1,667.02	\$0.00	\$0.00	144	\$13,336.16
Read the regulations covering financial responsibility requirements (existing facilities)	563	3	4.00	1.00	4.00	0.00	\$833.51	\$0.00	\$0.00	5,094	\$471,766.66
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	5,094	\$485,102.82
Financial Responsibility for Corrective Action (264.101)											
Prepare and submit documented assurances of financial responsibility for corrective action	184	N/A	2.00	0.50	5.50	1.00	\$653.78	\$0.00	\$3.20	1,652	\$120,586.05
Demonstrate, if applicable, that permission denied to implement correction action beyond facility boundary	18	N/A	1.00	0.50	1.25	0.25	\$250.90	\$0.00	\$3.20	55	\$4,663.95
Subtotal	varies	N/A	varies	varies	varies	varies	varies	varies	varies	1,707	\$125,250.00
Cost Estimates for Closure and Post-Closure Care (264.142, 264.144, 265.142, and 265.144)											
Adjust estimate annually to reflect inflation	563	3	0.00	0.00	0.50	0.00	\$28.90	\$0.00	\$0.00	283	\$16,354.57
Amend cost estimate due to closure/post-closure plan changes	0	0	0.00	0.50	6.50	0.50	\$431.79	\$0.00	\$0.00	0	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	283	\$16,354.57
Closure or Post-Closure Trust Fund (264.143, 265.143, 264.145, and 265.145)											
Establish a closure or post-closure trust fund	0	0	4.00	1.50	2.00	0.50	\$774.09	\$0.00	\$0.00	0	\$0.00
Submit originally signed duplicate of trust agreement	0	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$3.20	0	\$0.00
Submit formal certification of acknowledgement (post-closure trust funds only)	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$0.00
Submit receipt for first payment under trust agreement (new facilities)	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$0.00
Amend trust fund due to changes in closure/post-closure plan	3	0	2.00	1.00	0.75	0.25	\$391.98	\$0.00	\$0.00	11	\$1,118.13
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	11	\$1,118.13
Surety bond guaranteeing payment into a closure or post-closure trust fund (264.143(b), 265.143(b), 264.145(b) and 265.145(b)), or guaranteeing performance of closure or post-closure care (264.143(c) and 264.145(c))											
Establish surety bond and trust agreement	0	0	4.00	1.50	2.00	0.50	\$774.09	\$0.00	\$0.00	0	\$0.00
Submit originally signed duplicates of bond/trust agreement	0	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$3.20	0	\$0.00
Submit evidence of alternate financial mechanisms, if bond cancelled	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	0	\$0.00
Increase penal sum amount, if cost estimate modified	3	0	2.25	0.75	1.00	0.00	\$411.15	\$0.00	\$0.00	11	\$1,172.81
Submit evidence of increase in cost estimate	3	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	3	\$108.28
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	14	\$1,281.09
Closure or Post-Closure Letter of Credit (264.143(d), 265.143(c), 264.145(d), and 265.145(c))											
Obtain and submit letter of credit from issuing institution	0	0	4.00	1.50	2.00	0.50	\$774.09	\$0.00	\$0.33	0	\$0.00
Write and submit letter to accompany letter of credit	0	0	1.25	0.25	0.00	0.50	\$200.77	\$0.00	\$0.33	0	\$0.00
Submit originally signed duplicate of the trust agreement	0	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$3.20	0	\$0.00
Increase credit amount, if cost estimate modified	3	0	0.75	0.50	0.75	0.00	\$180.52	\$0.00	\$0.00	6	\$514.93
Submit evidence of increase in cost estimate	3	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	3	\$108.28
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	9	\$623.21
Closure or Post-Closure Insurance (264.143(e), 265.143(d), 264.145(e), and 265.145(d))											
Establish closure or post-closure insurance policy	0	0	4.00	1.50	2.00	0.50	\$774.09	\$0.00	\$0.00	0	\$0.00
Submit insurance policy certificate to EPA	0	0	0.00	0.00	0.00	0.50	\$17.38	\$0.00	\$0.33	0	\$0.00
Submit letter from insurer (for some interim status facilities only)	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$0.00
Increase insured amount, if cost estimate modified	3	0	2.50	0.50	0.00	0.00	\$366.78	\$0.00	\$0.00	9	\$1,046.23
Submit evidence of increase in cost estimate	3	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	3	\$108.28
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	11	\$1,154.51
Financial Test and Corporate Guarantee (264.143(f), 265.143(e), 264.145(f), and 265.145(e))											
Write and submit letter signed by chief financial officer	0	0	1.00	0.25	2.00	0.75	\$292.24	\$0.00	\$0.33	0	\$0.00
Submit copy of public accountant's report and special report	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	0	\$0.00
Submit updated information annually	567	4	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$3.20	2,282	\$81,147.92
Write and submit notice of intent to establish other financial assurance, if applicable	11	0	3.25	0.25	0.00	0.50	\$463.17	\$0.00	\$0.33	46	\$5,288.51
Write and submit any additional reports of financial condition	11	0	2.25	0.25	1.00	0.50	\$389.76	\$0.00	\$3.20	46	\$4,483.65
Submit corporate guarantee from parent corporation	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,373	\$90,920.07
Coverage for Sudden or Nonsudden Accidental Occurrences (264.147(a), 265.147(a), 264.147(b), and 265.147(b))											
Prepare, write, and submit a claim notification, if applicable	6	0	2.50	1.00	0.00	0.50	\$422.93	\$0.00	\$0.33	23	\$2,414.70
Prepare, write, and submit notification of reduction of liability coverage amount if applicable	23	0	2.00	1.00	0.50	0.50	\$386.23	\$0.00	\$0.33	91	\$8,821.19

Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	varies	114	\$11,235.88
Variance of financial responsibility regulations (265.147(c))												
Prepare and submit petition for variance	0	0	0.50	0.50	0.50	0.00	\$133.27	\$0.00	\$3.20	0	\$0.00	
Subtotal	0	0	0.50	0.50	0.50	0.00	\$266.54	\$0.00	\$3.20	0	\$0.00	
Financial Test for Liability Coverage (264.147(f) and 265.147(f))												
Prepare, write, and submit letter signed by chief financial officer	0	0	1.00	0.25	2.00	0.75	\$292.24	\$0.00	\$0.33	0	\$0.00	
Submit copy of public accountant's report and special report	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	0	\$0.00	
Submit updated information annually	283	2	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$3.20	1,141	\$40,573.96	
Submit evidence of insurance obtained for entire liability coverage, if applicable	11	0	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$3.20	23	\$829.74	
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,164	\$41,403.70	
Guarantee for Liability Coverage (264.147(g) and 265.147(g))												
Obtain and submit written guarantee from parent corporation	0	0	0.50	0.50	0.50	0.50	\$150.65	\$0.00	\$0.33	0	\$0.00	
Submit letter from guarantor's chief financial officer	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$0.00	
Submit updated information annually	283	2	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$3.20	1,141	\$40,573.96	
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1,141	\$40,573.96	
Letter of Credit for Liability Coverage (264.147(h) and 265.147(h))												
Obtain and submit stand-by letter of credit	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$0.33	0	\$0.00	
Subtotal	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$0.33	0	\$0.00	
Liability Insurance (264.147(a) and (b), and 265.147(a) and (b))												
Obtain and submit insurance policy documentation	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$3.20	0	\$0.00	
Subtotal	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$3.20	0	\$0.00	
Surety Bond for Liability Coverage (264.147(i) and 265.147(i))												
Obtain surety bond and submit copy to EPA	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$0.33	0	\$0.00	
Subtotal	0	0	4.00	1.00	2.00	1.00	\$752.69	\$0.00	\$0.33	0	\$0.00	
Trust Fund for Liability Coverage (264.147(j) and 265.147(j))												
Establish trust fund	0	0	4.50	1.50	1.00	1.00	\$799.28	\$0.00	\$0.00	0	\$0.00	
Submit originally signed duplicate of trust agreement to EPA	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$3.20	0	\$0.00	
Subtotal	0	0	4.50	1.50	1.00	2.00	\$834.04	\$0.00	\$3.20	0	\$0.00	
Incapacity of Owners or Operators, Guarantors, or Financial Institutions (264.148 and 265.148)												
Submit notice indicating commencement of bankruptcy proceedings	11	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	11	\$400.38	
Subtotal	11	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	11	\$400.38	
Use of State-Required Mechanisms (264.149) and 265.149)												
Submit letter from owner or operator	0	0	0.00	0.00	0.00	4.00	\$139.04	\$0.00	\$0.33	0	\$11.15	
Submit written evidence of establishment of State-required financial assurance mechanism	0	0	0.00	0.00	0.00	2.00	\$69.52	\$0.00	\$3.20	0	\$5.82	
Subtotal	0	0	0.00	0.00	0.00	6.00	\$208.56	\$0.00	\$3.53	0	\$16.97	
State Assumption of Responsibility (264.150 and 265.150)												
Prepare and submit letter from owner or operator	0	0	1.00	5.00	2.00	0.50	\$651.91	\$0.00	\$0.33	1	\$52.18	
Obtain and submit letter from State describing assumption of responsibility	0	0	0.00	0.00	0.00	1.00	\$34.76	\$0.00	\$0.33	0	\$2.81	
Prepare and submit any additional information requested by EPA	0	0.0	0.75	0.25	0.75	0.25	\$169.82	\$0.00	\$3.20	0	\$0.14	
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	1	\$55.12	
Estimated decrease in Federally-required cost due to facilities using State-required mechanisms	0	0	5.00	3.00	11.00	3.00	\$1,628.62	\$0.00	\$0.00	2	\$130.29	
Subtotal	0	0	5.00	3.00	11.00	3.00	\$1,628.62	\$0.00	\$0.00	2	\$130.29	
TOTAL	varies	varies	0.00	varies	varies	varies	varies	varies	varies	varies	11,936	\$815,620.70

EXHIBIT 6
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST
PERMIT CONDITIONS

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent							Total Hours and Costs	
	Permitted	Interim Status	Legal \$131.20 /hour	Manager \$77.55 /hour	Technical \$57.79 /hour	Clerical \$34.76 /hour	Labor Cost \$/Year	Capital/Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
Conditions applicable to all permits (270.30(h) and (j))											
Prepare and submit information requested by EPA	173	N/A	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$3.20	259.50	\$15,408.68
Prepare and submit notice of planned physical alterations or additions	155	N/A	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$0.33	232.50	\$13,360.61
Prepare and submit notice of planned changes or activities which may result in noncompliance	78	N/A	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$0.33	117.00	\$6,723.41
Prepare and submit letter certifying compliance	39	N/A	0.00	0.25	1.00	0.25	\$85.87	\$0.00	\$0.33	58.50	\$3,361.70
Prepare and submit monitoring reports	247	N/A	0.00	0.25	8.00	0.25	\$490.40	\$0.00	\$3.20	2099.50	\$121,918.58
Prepare and submit reports of compliance or noncompliance with compliance schedule	11	N/A	0.00	0.25	2.00	1.00	\$169.73	\$0.00	\$3.20	36.82	\$1,959.27
Compile and submit information for 24-hour reporting of a release of hazardous waste, a fire, or an explosion	11	N/A	0.00	0.50	8.00	0.50	\$518.48	\$0.00	\$3.20	101.97	\$5,910.58
Prepare and submit notice of noncompliance due to a release, fire, or explosion	11	N/A	0.00	0.50	4.00	0.50	\$287.32	\$0.00	\$0.33	56.65	\$3,259.02
Prepare and submit a report of other noncompliance	23	N/A	0.00	0.50	2.00	0.50	\$171.74	\$0.00	\$3.20	67.98	\$3,964.03
Prepare and submit omitted or corrected information	11	N/A	0.00	0.25	0.50	0.25	\$56.97	\$0.00	\$3.20	11.33	\$681.75
TOTAL	varies	N/A	varies	varies	varies	varies	varies	varies	varies	3,041.75	\$176,547.63

TABLE 2
TOTAL ESTIMATED RESPONDENT BURDEN AND COST SUMMARY

EXHIBIT	Total Hours per Year	Total Capital per Year	Total O&M per Year	Total Labor Cost per Year	Total Cost per Year
Exhibit 1					
General Facility Standards	441,048	\$0	\$312,887	\$31,764,561	\$32,077,448
Exhibit 2					
Recordkeeping Requirements	92,162	\$12,658	\$0	\$4,045,373	\$4,058,031
Exhibit 3					
Contingency Plan and Emergency Procedures	282	\$0	\$99	\$15,950	\$16,049
Exhibit 4					
Closure and Post-Closure Requirements	342	\$0	\$7,478	\$19,419	\$26,897
Exhibit 5					
Financial Requirements	11,936	\$0	\$2,481	\$813,140	\$815,621
Exhibit 6					
Permit Conditions	3,042	\$0	\$1,619	\$174,929	\$176,548
TOTAL	548,811	12,658	324,565	36,833,371	\$37,170,594

1,646,432.25
111,511,781.20

Check: **37,170,594**

EXHIBIT 7
ESTIMATED ANNUAL STATE AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent or Activity							Total Hours and Costs	
	Permitted	Interim	Legal 63.48 /hour	Manager \$59.59 /hour	Technical \$35.65 /hour	Clerical \$22.74 /hour	Labor Cost \$/Year	Capital/ Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
GENERAL FACILITY OPERATING REQUIREMENTS											
Foreign Shipment Import Report											
Review foreign shipment import report	34	0	0.00	0.00	1.00	0.00	35.65	0.00	0.00	33.96	\$1,210.67
Review of records during inspections	0	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	0.00	\$0.00
Subtotal	varies	varies	0.00	0.00	varies	varies	varies	\$0.00	\$0.00	33.96	\$1,210.67
RECORDKEEPING REQUIREMENTS											
Operating Record											
On-site review of the operating record	563	3	0.00	0.00	2.00	0.00	71.30	0.00	0.00	1,132.00	\$40,355.80
Subtotal	563	3	0.00	0.00	2.00	0.00	71.30	0.00	0.00	1,132.00	\$40,355.80
CONTINGENCY PLAN AND EMERGENCY PROCEDURES											
Contingency Plan											
On-site review of the contingency plan	1,133	8	0.00	0.00	0.50	0.00	17.83	0.00	0.00	570.50	\$20,338.33
Emergency Reporting Requirements											
Review owner/operator's emergency report	11	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	11.41	\$406.77
Subtotal	varies	varies	0.00	0.00	varies	varies	varies	\$0.00	\$0.00	581.91	\$20,745.09
CLOSURE AND POST-CLOSURE											
Review closure plans	N/A	0	0.00	0.00	15.00	0.00	\$534.75	\$0.00	\$0.00	0.00	\$0.00
Review closure plan amendment notifications	N/A	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	0.30	\$10.70
Review partial or final closure notifications and closure plans (interim status facilities)	7	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	14.00	\$499.10
Review demonstration for extension for treatment, storage, or removal of hazardous waste	1	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	2.80	\$99.82
Review demonstration for extension of closure period	1	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	1.40	\$49.91
Review demonstration for receiving non-hazardous waste	0	0	0.00	0.00	0.50	0.00	\$17.83	\$0.00	\$0.00	0.18	\$6.24
Review closure certifications	7	0	0.00	0.00	4.00	0.00	\$142.60	\$0.00	\$0.00	28.00	\$998.20
Review survey plat	1	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	0.50	\$17.83

Review post-closure plan	N/A	0	0.00	0.00	15.00	0.00	\$534.75	\$0.00	\$0.00	0.00	\$0.00
Review post-closure plan amendment notifications and amended plans	N/A	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	0.00	\$0.00
Review post-closure plan modifications	N/A	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	0.00	\$0.00
Review resubmitted plans	N/A	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	0.00	\$0.00
Review petition to extend or reduce the post-closure care period	N/A	0	0.00	0.50	1.00	0.00	\$65.45	\$0.00	\$0.00	0.00	\$0.00
Review hazardous waste disposal records	1	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	1.00	\$35.65
Review hazardous waste notation certification	1	0	0.00	0.00	1.00	0.00	\$35.65	\$0.00	\$0.00	1.00	\$35.65
Review post-closure care certification	0	0	0.00	0.00	4.00	0.00	\$142.60	\$0.00	\$0.00	0.00	\$0.00
Subtotal	varies	varies	0.00	varies	varies	varies	varies	\$0.00	\$0.00	49.18	\$1,753.09
FINANCIAL REQUIREMENTS											
Review increases in sum amounts, if cost estimate modified, and additional reports of financial conditions	0	0	0.00	0.00	8.00	0.00	\$285.20	\$0.00	\$0.00	0.00	\$0.00
Review new estimates and instruments	0	0	0.00	0.00	7.50	0.00	\$267.38	\$0.00	\$0.00	0.00	\$0.00
Review annual closure cost updates to reflect inflation	0	0	0.00	0.00	0.50	0.00	\$17.83	\$0.00	\$0.00	0.00	\$0.00
Review liability claim notifications	0	0	1.00	0.00	2.00	0.00	\$134.78	\$0.00	\$0.00	0.00	\$0.00
Review and approve or deny petition for variance	0	59	0.00	0.50	1.00	0.00	\$65.45	\$0.00	\$0.00	88.50	\$3,861.26
Review revisions due to plan changes	56	274	0.00	0.00	8.00	0.00	\$285.20	\$0.00	\$0.00	2,640.00	\$94,116.00
Review updated financial test and corporate guarantee information	314	23	0.00	0.00	8.00	0.00	\$285.20	\$0.00	\$0.00	2,696.00	\$96,112.40
Review bankruptcy notifications	28	72	1.00	0.00	2.00	0.00	\$134.78	\$0.00	\$0.00	300.00	\$13,478.00
Review State assumptions of responsibility/required mechanism documentation	0	0	0.00	0.00	2.00	0.00	\$71.30	\$0.00	\$0.00	0.00	\$0.00
Review corrective action financial assurance	0	0	1.00	0.00	8.00	0.00	\$348.68	\$0.00	\$0.00	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	0.00	varies	\$0.00	\$0.00	5,724.50	\$207,567.66
PERMIT CONDITIONS											
Review submitted information	173	0	0.00	0.25	1.00	0.10	\$52.82	\$0.00	\$0.00	233.55	\$9,138.12
Review notice of planned physical alterations or additions	155	0	0.00	0.00	0.50	0.10	\$20.10	\$0.00	\$0.00	93.00	\$3,115.35
Review notice of planned changes or activities	78	0	0.00	0.25	0.50	0.10	\$35.00	\$0.00	\$0.00	66.30	\$2,729.73
Review letter certifying compliance	39	0	0.00	0.25	0.50	0.10	\$35.00	\$0.00	\$0.00	33.15	\$1,364.86
Review monitoring reports	247	0	0.00	0.00	5.00	0.00	\$178.25	\$0.00	\$0.00	1,235.00	\$44,027.75
Review reports of compliance or noncompliance	11.33	0	0.00	0.00	1.00	0.10	\$37.92	\$0.00	\$0.00	12.46	\$429.68
Review information concerning a release, fire, or explosion	11	0	0.00	0.00	0.50	0.10	\$20.10	\$0.00	\$0.00	6.80	\$227.72
Review notices and reports of noncompliance	11	0	0.00	0.00	0.50	0.10	\$20.10	\$0.00	\$0.00	6.80	\$227.72
Review reports of other noncompliance	23	0	0.00	0.00	0.50	0.10	\$20.10	\$0.00	\$0.00	13.60	\$455.44
Review corrected information	11	0	0.00	0.00	0.50	0.25	\$23.51	\$0.00	\$0.00	8.50	\$266.37
Subtotal	varies	0	0.00	varies	varies	varies	varies	\$0.00	\$0.00	1,709.15	\$61,982.74
TOTAL	varies	varies	varies	varies	varies	varies	varies	varies	varies	71,213.44	\$333,615.05

TABLE 3
 TOTAL ESTIMATED STATE AGENCY BURDEN AND COST SUMMARY

EXHIBIT	Total Hours per Year	Total Labor Cost per Year	Total O&M Cost per Year
General Facility Standards	34	1,211	0
Recordkeeping Requirements	1,132	40,356	0
Contingency Plan and Emergency Procedures	582	20,745	0
Closure and Post-Closure Requirements	49	1,753	0
Financial Requirements	5,725	207,568	0
Permit Conditions	1,709	61,983	0
TOTAL	9,231	\$333,615	\$0

Respondents	Legal	Manager	Technical	Clerical
Hourly Wage				
Overhead Multiplier				
Total Hourly Rate	\$95.02	\$83.84	\$60.32	\$25.73
Agency		Manager	Technical	Clerical
Hourly Wage				
Overhead Multiplier				
Total Hourly Rate				

EXHIBIT 11
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Number of Respondents		Hours and Costs per Respondent or Activity		
	Permitted	Interim	Legal 95.02 /hour	Manager \$83.84 /hour	Technical \$60.32 /hour
GENERAL FACILITY OPERATING REQUIREMENTS					
Foreign Shipment Import Report					
Review foreign shipment import report	6	0	0.00	0.00	1.00
Review of records during inspections	0	0	0.00	0.00	1.00
Subtotal	varies	varies	0.00	0.00	varies
RECORDKEEPING REQUIREMENTS					
Operating Record					
On-site review of the operating record	96	3	0.00	0.00	2.00
Subtotal	96	3	0.00	0.00	2.00
CONTINGENCY PLAN AND EMERGENCY PROCEDURES					
Contingency Plan					
On-site review of the contingency plan	193	8	0.00	0.00	0.50
Emergency Reporting Requirements					
Review owner/operator's emergency report	11	0	0.00	0.00	1.00
Subtotal	varies	varies	0.00	0.00	varies
CLOSURE AND POST-CLOSURE					
Review closure plans	N/A	0	0.00	0.00	15.00
Review closure plan amendment notifications	N/A	0	0.00	0.00	2.00
Review partial or final closure notifications and closure plans (interim status facilities)	7	0	0.00	0.00	2.00
Review demonstration for extension for treatment, storage, or removal of hazardous waste	1	0	0.00	0.00	2.00
Review demonstration for extension of closure period	1	0	0.00	0.00	1.00
Review demonstration for receiving non-hazardous waste	0	0	0.00	0.00	0.50
Review closure certifications	7	0	0.00	0.00	4.00
Review survey plat	1	0	0.00	0.00	1.00
Review post-closure plan	N/A	0	0.00	0.00	15.00
Review post-closure plan amendment notifications and amended plans	N/A	0	0.00	0.00	2.00
Review post-closure plan modifications	N/A	0	0.00	0.00	2.00
Review resubmitted plans	N/A	0	0.00	0.00	2.00
Review petition to extend or reduce the post-closure care period	N/A	0	0.00	0.50	1.00
Review hazardous waste disposal records	1	0	0.00	0.00	1.00
Review hazardous waste notation certification	1	0	0.00	0.00	1.00
Review post-closure care certification	0	0	0.00	0.00	4.00
Subtotal	varies	varies	0.00	varies	varies
FINANCIAL REQUIREMENTS					
Review increases in sum amounts, if cost estimate modified, and additional reports of financial conditions	0	0	0.00	0.00	8.00
Review new estimates and instruments	0	0	0.00	0.00	7.50
Review annual closure cost updates					

to reflect inflation	0	0	0.00	0.00	0.50
Review liability claim notifications	0	0	1.00	0.00	2.00
Review and approve or deny petition for variance	0	0	0.00	0.50	1.00
Review revisions due to plan changes	5	0	0.00	0.00	8.00
Review updated financial test and corporate guarantee information	54	0	0.00	0.00	8.00
Review bankruptcy notifications	5	0	1.00	0.00	2.00
Review State assumptions of responsibility/ required mechanism documentation	0	0	0.00	0.00	2.00
Review corrective action financial assurance	0	0	1.00	0.00	8.00
Subtotal	varies	varies	varies	varies	varies
PERMIT CONDITIONS					
Review submitted information	193.97	0	0.00	0.25	1.00
Review notice of planned physical alterations or additions	193.97	0	0.00	0.00	0.50
Review notice of planned changes or activities	13	0	0.00	0.25	0.50
Review letter certifying compliance	7	0	0.00	0.25	0.50
Review monitoring reports	41.99	0	0.00	0.00	5.00
Review reports of compliance or noncompliance	11.33	0	0.00	0.00	1.00
Review information concerning a release, fire, or explosion	2	0	0.00	0.00	0.50
Review notices and reports of noncompliance	2	0	0.00	0.00	0.50
Review reports of other noncompliance	4	0	0.00	0.00	0.50
Review corrected information	2	0	0.00	0.00	0.50
Subtotal	varies	0	0.00	varies	varies
TOTAL	varies	varies	varies	varies	varies

Total Hours and Costs

Clerical \$25.73 /hour	Labor Cost \$/Year	Capital/ Startup Cost	O&M Cost	Total Hours per Year	Total Cost per Year
0.00	60.32	0.00	0.00	5.92	\$357.25
0.00	\$60.32	\$0.00	\$0.00	0.00	\$0.00
varies	varies	\$0.00	\$0.00	5.92	\$357.25
0.00	120.64	0.00	0.00	197.42	\$11,908.37
0.00	120.64	0.00	0.00	197.42	\$11,908.37
0.00	30.16	0.00	0.00	100.31	\$6,050.40
0.00	\$60.32	\$0.00	\$0.00	11.41	\$688.25
varies	varies	\$0.00	\$0.00	111.72	\$6,738.65
0.00	\$904.80	\$0.00	\$0.00	0.00	\$0.00
0.00	\$120.64	\$0.00	\$0.00	0.30	\$18.10
0.00	\$120.64	\$0.00	\$0.00	14.00	\$844.48
0.00	\$120.64	\$0.00	\$0.00	2.80	\$168.90
0.00	\$60.32	\$0.00	\$0.00	1.40	\$84.45
0.00	\$30.16	\$0.00	\$0.00	0.18	\$10.56
0.00	\$241.28	\$0.00	\$0.00	28.00	\$1,688.96
0.00	\$60.32	\$0.00	\$0.00	0.50	\$30.16
0.00	\$904.80	\$0.00	\$0.00	0.00	\$0.00
0.00	\$120.64	\$0.00	\$0.00	0.00	\$0.00
0.00	\$120.64	\$0.00	\$0.00	0.00	\$0.00
0.00	\$120.64	\$0.00	\$0.00	0.00	\$0.00
0.00	\$102.24	\$0.00	\$0.00	0.00	\$0.00
0.00	\$60.32	\$0.00	\$0.00	1.00	\$60.32
0.00	\$60.32	\$0.00	\$0.00	1.00	\$60.32
0.00	\$241.28	\$0.00	\$0.00	0.00	\$0.00
varies	varies	\$0.00	\$0.00	49.18	\$2,966.24
0.00	\$482.56	\$0.00	\$0.00	0.00	\$0.00
0.00	\$452.40	\$0.00	\$0.00	0.00	\$0.00

0.00	\$30.16	\$0.00	\$0.00	0.00	\$0.00
0.00	\$215.66	\$0.00	\$0.00	0.00	\$0.00
0.00	\$102.24	\$0.00	\$0.00	0.00	\$0.00
0.00	\$482.56	\$0.00	\$0.00	40.00	\$2,412.80
0.00	\$482.56	\$0.00	\$0.00	432.00	\$26,058.24
0.00	\$215.66	\$0.00	\$0.00	15.00	\$1,078.30
0.00	\$120.64	\$0.00	\$0.00	0.00	\$0.00
0.00	\$577.58	\$0.00	\$0.00	0.00	\$0.00
0.00	varies	\$0.00	\$0.00	487.00	\$29,549.34

0.10	\$83.85	\$0.00	\$0.00	261.86	\$16,264.97
0.10	\$32.73	\$0.00	\$0.00	116.38	\$6,349.22
0.10	\$53.69	\$0.00	\$0.00	11.27	\$711.97
0.10	\$53.69	\$0.00	\$0.00	5.64	\$355.98
0.00	\$301.60	\$0.00	\$0.00	209.95	\$12,664.18
0.10	\$62.89	\$0.00	\$0.00	12.46	\$712.58
0.10	\$32.73	\$0.00	\$0.00	1.16	\$63.05
0.10	\$32.73	\$0.00	\$0.00	1.16	\$63.05
0.10	\$32.73	\$0.00	\$0.00	2.31	\$126.09
0.25	\$36.59	\$0.00	\$0.00	1.44	\$70.48
varies	varies	\$0.00	\$0.00	623.63	\$37,381.57
varies	varies	varies	varies	1,474.86	\$88,901.42

4,424.58 266,704.26

TABLE 4
TOTAL ESTIMATED EPA BURDEN AND COST SUMMARY

EXHIBIT	Total Hours per Year	Total Labor Cost per Year
General Facility Standards	6	357
Recordkeeping Requirements	197	11,908
Contingency Plan and Emergency Procedures	112	6,739
Closure and Post-Closure Requirements	49	2,966
Financial Requirements	487	29,549
Permit Conditions	624	37,382
TOTAL	1,475	\$88,901