

**EXHIBIT 1
 READING THE REGULATIONS
 ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

	Hours and Costs Per Respondent Per Activity							Total Hours and Costs			
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year	Total Cost/ Year
INFORMATION COLLECTION ACTIVITY											
Reading and Understanding the Regulations for ID, Listing, and Rulemaking Petitions											
Read the Regulations	0.25	0.50	1.00	0.00	1.75	\$136.85	\$0.00	\$0.00	2,603	4,555.25	\$356,208
Total: Read the Regulations	0.25	0.50	1.00	0.00	1.75	\$136.85	\$0.00	\$0.00	2,603	4,555.25	\$356,208

**EXHIBIT 2
RULEMAKING PETITIONS
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Rulemaking Petitions										
General Requirements (260.20)										
Describe/prepare a statement on proposed action	1.63	5.45	16.35	7.63	31.06	\$1,878.69	\$0.00	\$ 10,892	5	155.30
State the need and justification for the proposed action	0.00	5.45	54.49	0.00	59.94	\$3,359.37	\$0.00	\$0.00	5	299.70
Subtotal	1.63	10.90	70.84	7.63	91.00	\$5,238.06	\$0.00	\$10,892.00	5	455.00
Equivalent Methods Petitions (260.21)										
Describe the proposed method	0.00	3.00	20.00	1.00	24.00	\$1,371.71	\$0.00	\$0.00	1	24.00
Describe the proposed methods' procedural steps and equipment	0.00	2.00	10.00	1.00	13.00	\$755.21	\$0.00	\$0.00	1	13.00
Describe wastes/waste matrices for proposed method	0.00	3.00	20.00	2.00	25.00	\$1,404.82	\$0.00	\$0.00	1	25.00
Compare results from proposed method with results from prescribed method	0.00	2.00	10.00	0.00	12.00	\$722.10	\$0.00	\$0.00	1	12.00
Assess any limiting factors for the proposed method	0.00	5.00	30.00	2.00	37.00	\$2,126.92	\$0.00	\$0.00	1	37.00
Describe the quality and control procedures	0.00	3.00	20.00	1.00	24.00	\$1,371.71	\$0.00	\$0.00	1	24.00
Provide any additional information	0.00	2.00	10.00	1.00	13.00	\$755.21	\$0.00	\$0.00	1	13.00
Subtotal	0.00	20.00	120.00	8.00	148.00	\$8,507.68	\$0.00	\$0.00	1	148.00
Delisting Petition (260.22)										
Provide general information on the laboratory conducting the tests	0.00	0.00	8.79	0.00	15.38	\$449.20	\$0.00	\$0.00	4	61.52
Provide detailed information on the individuals sampling and testing the waste samples	0.00	4.40	0.88	0.88	10.76	\$538.26	\$0.00	\$1,609.00	4	43.04
Provide the dates of sampling and testing	0.00	0.00	0.88	0.00	1.54	\$44.92	\$0.00	\$0.00	4	6.16
Provide information on the location of the facility	0.00	0.00	0.88	0.88	3.08	\$74.03	\$0.00	\$0.00	4	12.32
Describe the manufacturing processes										

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or other operations and feed materials producing the waste	0.00	4.40	87.92	0.88	163.10	\$4,985.31	\$0.00	\$0.00	4	652.40
Assess variability of generator's waste stream	0.00	0.00	87.92	0.00	153.86	\$4,491.97	\$0.00	\$0.00	4	615.44
Describe the waste	0.00	0.00	17.58	0.88	32.31	\$927.51	\$0.00	\$0.00	4	129.24
Estimate the average maximum monthly and annual quantities of waste covered by the demonstration	0.00	0.00	17.58	0.00	30.77	\$898.39	\$0.00	\$0.00	4	123.08
Provide pertinent data on discussion of factors per 261.11(a)(3)	0.00	0.00	43.96	0.88	78.47	\$2,275.10	\$0.00	\$0.00	4	313.88
Describe the methodologies and equipment used for representative samples	0.00	0.00	35.17	0.88	63.09	\$1,825.90	\$0.00	\$32,180.00	4	252.36
Describe the sample handling and preparation techniques	0.00	0.00	17.58	0.88	32.31	\$927.51	\$0.00	\$0.00	4	129.24
Describe the tests performed and their results	0.00	0.00	0.88	0.88	3.08	\$74.03	\$0.00	\$5,324.00	4	12.32
Provide the name and model numbers of instruments used	0.00	0.00	0.88	0.88	3.08	\$74.03	\$0.00	\$0.00	4	12.32
Certify petition	0.00	0.88	0.00	0.00	1.54	\$92.85	\$0.00	\$0.00	4	6.16
Provide any additional information	0.00	3.52	21.98	0.00	55.63	\$1,494.38	\$0.00	\$0.00	4	222.52
Subtotal	0.00	13.19	342.90	7.91	648.00	\$19,173.38	\$0.00	\$39,113.00	4	2,592.00
Total: Rulemaking Petitions	varies	varies	varies	varies	varies	\$32,919.12	\$0.00	\$50,005.00	varies	3,195.00

Costs

Total Cost/ Year
\$63,853.43
\$16,796.86
\$80,650.29
\$1,371.71
\$755.21
\$1,404.82
\$722.10
\$2,126.92
\$1,371.71
\$755.21
\$8,507.68
\$1,796.79
\$8,589.05
\$179.68
\$296.12

Costs

Total Cost/ Year
\$19,941.26
\$17,967.88
\$3,710.02
\$3,593.58
\$9,100.39
\$136,023.60
\$3,710.02
\$21,592.12
\$296.12
\$371.39
\$5,977.51
\$233,145.53
\$322,303.50

**EXHIBIT 3
SOLID WASTE AND BOILER VARIANCE REQUIREMENTS
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Solid Waste and Boiler Variance Requirements										
Variance from Classification as a Solid Waste (260.31)(a) and 260.33(a))										
Provide information on the manner in which the material is expected to be recycled	0.00	0.00	30.00	0.00	30.00	\$1,532.70	\$0.00	\$25.00	10	300.00
Explain why the petitioner has accumulated for one or more years without recycling 75% of the volume accumulated at the beginning of the year	0.00	0.00	5.00	0.00	5.00	\$255.45	\$0.00	\$0.00	10	50.00
Provide information on the quantity of material already accumulated and the quantity expected to be generated and accumulated before the material is recycled	0.00	0.00	24.00	0.00	24.00	\$1,226.16	\$0.00	\$0.00	10	240.00
Provide information on the extent to which the material is handled to minimize loss	0.00	0.00	6.00	0.00	6.00	\$306.54	\$0.00	\$0.00	10	60.00
Provide any additional relevant information	0.00	0.00	10.00	0.00	10.00	\$510.90	\$0.00	\$0.00	10	100.00
Subtotal	0.00	0.00	75.00	0.00	75.00	\$3,831.75	\$0.00	\$25.00	10	750.00
Variance From Classification as a Solid Waste (260.31(b) and 260.33(a))										
Provide information on the economic viability of the production process using virgin materials solely, rather than reclaimed materials	0.00	0.00	40.00	0.00	40.00	\$2,043.60	\$0.00	\$25.00	10	400.00
Describe the industry-wide prevalence of the practice	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00
Describe the extent to which the material is handled before reclamation to minimize loss	0.00	0.00	24.00	0.00	24.00	\$1,226.16	\$0.00	\$0.00	10	240.00

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	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Describe the time periods between material generation and reclamation, and between reclamation and return to original primary production process	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00
Describe the location of the reclamation operation and production process	0.00	0.00	1.00	0.00	1.00	\$51.09	\$0.00	\$0.00	10	10.00
Describe whether the reclaimed material is used for the purpose for which it was originally produced when returned to the original process	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00
Describe whether the person who generates the material also reclaims it	0.00	0.00	1.00	0.00	1.00	\$51.09	\$0.00	\$0.00	10	10.00
Provide any additional relevant information	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00
Subtotal	0.00	0.00	146.00	0.00	146.00	\$7,459.14	\$0.00	\$25.00	10	1,460.00
Variance From Classification as a Solid Waste (260.31(c) and 260.33(a))										
Provide information on the degree of processing the material has undergone and the degree of further processing that is required	0.00	0.00	40.00	0.00	40.00	\$2,043.60	\$0.00	\$25.00	10	400.00
Provide information on the value of the reclaimed material	0.00	0.00	16.00	0.00	16.00	\$817.44	\$0.00	\$0.00	10	160.00
Describe the degree to which the reclaimed material is like an analogous raw material	0.00	0.00	40.00	0.00	40.00	\$2,043.60	\$0.00	\$0.00	10	400.00
Examine the extent to which an end market for the reclaimed material is guaranteed	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00
Describe the extent to which the reclaimed material is handled to minimize loss	0.00	0.00	6.00	0.00	6.00	\$306.54	\$0.00	\$0.00	10	60.00
Provide any additional relevant information	0.00	0.00	20.00	0.00	20.00	\$1,021.80	\$0.00	\$0.00	10	200.00

**EXHIBIT 3
SOLID WASTE AND BOILER VARIANCE REQUIREMENTS
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
INFORMATION COLLECTION ACTIVITY										
Subtotal	0.00	0.00	142.00	0.00	142.00	\$7,254.78	\$0.00	\$25.00	10	1,420.00

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	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Variance for Classification as a Boiler (260.32 and 260.33(a))										
Describe the extent to which the unit has provisions for recovering and exporting thermal energy from steam, heated fluids, or heated gases	0.00	1.00	10.00	0.00	11.00	\$616.50	\$0.00	\$0.00	1	11.00
Describe the extent to which the combustion chamber and energy recovery equipment are of integral design	0.00	1.00	20.00	0.00	21.00	\$1,127.40	\$0.00	\$0.00	1	21.00
Describe the efficiency of energy recovery, calculated in terms of the recovered energy compared with the thermal value of fuel	0.00	1.00	20.00	4.00	25.00	\$1,259.84	\$0.00	\$0.00	1	25.00
Describe the extent to which exported energy is utilized	0.00	0.00	16.00	3.00	19.00	\$916.77	\$0.00	\$0.00	1	19.00
Describe the extent to which the device is in common and customary use as a 'boiler' functioning primarily to produce steam, heated fluids, or heated gases	0.00	1.00	20.00	1.00	22.00	\$1,160.51	\$0.00	\$0.00	1	22.00
Provide any additional relevant information	0.00	0.00	10.00	8.00	18.00	\$775.78	\$0.00	\$0.00	1	18.00
Subtotal	0.00	4.00	96.00	16.00	116.00	\$5,856.80	\$0.00	\$0.00	1	116.00
Total: Solid Waste and Boiler Variance Requirements	varies	varies	varies	varies	479.00	\$24,402.47	\$0.00	\$75.00	varies	3,746.00

Costs

Total Cost/ Year
\$15,577.00
\$2,554.50
\$12,261.60
\$3,065.40
\$5,109.00
\$38,567.50
\$20,686.00
\$10,218.00
\$12,261.60

Costs

Total Cost/ Year
\$10,218.00
\$510.90
\$10,218.00
\$510.90
\$10,218.00
\$74,841.40
\$20,686.00
\$8,174.40
\$20,436.00
\$10,218.00
\$3,065.40
\$10,218.00

Costs

Total Cost/ Year
\$72,797.80

Costs

Total Cost/ Year
\$616.50
\$1,127.40
\$1,259.84
\$916.77
\$1,160.51
\$775.78
\$5,856.80
\$192,063.50

**EXHIBIT 4
EXCLUSIONS FROM THE DEFINITION OF HAZARDOUS WASTE
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Hazardous Waste Exclusions										
Wastewater Exemption (261.3(a)(2)(iv))										
Demonstrate the wastewater exclusion	0.00	4.00	16.00	8.00	28.00	\$1,504.72	\$0.00	\$6.00	1	28.00
Revisions to the Headworks Exclusion at 261.3(a)(2)(iv)(A), (B), (D), (F) and (G)										
Direct Monitoring: Site-Specific Sampling Plan										
Prepare and submit site-specific sampling plan	0.00	0.50	1.00	0.50	2.00	\$120.45	\$0.00	\$3.00	604	1,207.33
Conduct direct monitoring	0.00	0.00	24.00	0.00	24.00	\$1,226.16	\$0.00	\$4,714.00	1,811	43,464.00
Update and submit the sampling plan if needed	0.00	0.10	0.25	0.15	0.50	\$28.30	\$0.00	\$3.00	27	13.50
Facilities Claiming Expanded de minimis Exemption										
Keep records of documents	0.00	0.00	0.35	0.15	0.50	\$22.85	\$0.00	\$0.00	1,337	668.50
Nonwastewater Exemption (261.3(c)(2)(ii)(C))										
Prepare and submit notification and certification	0.00	1.00	1.00	1.50	3.50	\$206.36	\$0.00	\$13.00	1	3.50
Maintain documents in facility files	0.00	0.00	0.00	0.50	0.50	\$16.56	\$0.00	\$0.00	1	0.50
Exclusion for Spent Wood Preserving Solutions and Wastewaters from Wood Preserving Processes (261.4(a)(9)(iii))										
Prepare and submit notification	0.00	0.50	1.00	6.00	7.50	\$302.55	\$0.00	\$3.00	5	37.50
Update notification, if needed	0.00	1.00	8.00	2.00	11.00	\$580.54	\$0.00	\$3.00	15	165.00
Exclusion for Secondary Materials from the Mineral Processing Industry (261.4(a)(17))										
Prepare and submit application	0.00	1.00	8.00	1.00	10.00	\$547.43	\$0.00	\$3.00	0	0.00
Prepare and submit notification	0.00	0.50	1.00	8.00	9.50	\$368.77	\$0.00	\$3.00	0	0.00
Update notification, if needed	0.00	0.25	0.50	9.00	9.75	\$349.94	\$0.00	\$3.00	0	0.00
Exclusion for Recycled Hazardous Secondary Materials to Make Zinc Fertilizer Products (261.4(a)(20)-(21))										
Requirements for Generators										
Notification (261.4(a)(20)(ii)(B))										
Complete and submit notification	0.00	0.10	0.25	0.00	0.35	\$23.33	\$0.00	\$3.00	8	2.80
Record of Shipments (261.4(a)(ii)(C))										
Keep records of shipping activities	0.00	0.00	0.00	0.10	0.10	\$3.31	\$0.00	\$0.00	24	2.40
Requirements for Manufacturers										
Notification (261.4(a)(20)(iii)(B))										
Complete and submit notification	0.00	0.10	0.25	0.00	0.35	\$23.33	\$0.00	\$3.00	2	0.70
Record of Shipments (261.4(a)(iii)(C))										
Keep records of shipping activities	0.00	0.00	0.00	0.10	0.10	\$3.31	\$0.00	\$0.00	5	0.50

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	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Annual report (261.4(a)(20)(iii)(D))										
Complete and submit the annual report	0.00	0.25	2.00	0.50	2.75	\$145.14	\$0.00	\$3.00	5	13.75
Product sampling and analysis (261.4(a)(21)(ii)(iii))										
Sample and analyze the product	0.00	0.00	1.00	0.00	1.00	\$51.09	\$0.00	\$2,068.00	5	5.00
Keep sampling and analysis records	0.00	0.00	0.00	0.10	0.10	\$3.31	\$0.00	\$0.00	5	0.50
Exemption for Chromium-Containing Waste (261.4(b)(6))										
Demonstrate the waste meets the hazardous waste exclusion	0.00	4.00	16.00	8.00	28.00	\$1,504.72	\$0.00	\$6.00	1	28.00
Exemption for Samples (261.4(d)(2)(ii)(A))										
Collect and maintain information on the sample and the collector	0.00	1.00	16.00	4.00	21.00	\$1,055.48	\$0.00	\$6.00	45	945.00
Exemption for Treatability Study Samples (261.4(e)(2)-(3))										
Collect, copy, file and maintain the required information	0.00	0.00	4.00	0.00	4.00	\$204.36	\$0.00	\$25.00	2	8.00
Prepare and report to EPA required information (in the Biennial Report)*	0.00	0.00	4.00	0.00	4.00	\$204.36	\$0.00	\$0.00	2	8.00
Prepare and submit a request for an increase of the quantity limit	0.00	1.00	4.00	1.00	6.00	\$343.07	\$0.00	\$0.00	1	6.00
Prepare and submit a request for an extension of up to two years for treatability studies involving bioremediation	0.00	1.00	4.00	1.00	6.00	\$343.07	\$0.00	\$0.00	1	6.00

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	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Exemption for Treatability Study Samples Undergoing Testing (261.4)(f)										
Notify the Regional Administrator	0.00	1.00	0.00	1.00	2.00	\$138.71	\$0.00	\$13.00	2	4.00
Maintain records for three years	0.00	0.00	0.00	1.00	1.00	\$33.11	\$0.00	\$6.00	2	2.00
Prepare and submit the annual report	0.00	2.00	10.00	4.00	16.00	\$854.54	\$0.00	\$13.00	2	32.00
Prepare and submit the termination letter	0.00	1.00	0.00	2.00	3.00	\$171.82	\$0.00	\$13.00	2	6.00
Sub-Total: Hazardous Waste Exclusions	varies	varies	varies	varies	202.50	\$10,380.67	\$0.00	\$6,913.00	varies	46,658.48
Solid Waste Exclusions										

Costs

Total Cost/ Year
\$1,510.72
\$74,520
\$10,757,630
\$845
\$30,548
\$219.36
\$16.56
\$1,527.75
\$8,753.10
\$0.00
\$0.00
\$0.00
\$210.66
\$79.46
\$43.98
\$16.56

Costs

Total Cost/ Year
\$740.68
\$10,595.45
\$16.56
\$1,510.72
\$47,766.60
\$458.72
\$408.72
\$343.07
\$343.07

Costs

Total Cost/ Year
\$303.42
\$78.22
\$1,735.08
\$369.64
\$10,940,590

**EXHIBIT 5
HAZARDOUS WASTE LISTING EXEMPTIONS
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$131.82 /Hour	Mgr. \$105.60 /Hour	Tech. \$51.09 /Hour	Cler. \$33.11 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Respon. or Activ.	Total Hours/ Year
Hazardous Waste Listing Exemptions										
Hazardous Wastes from Non-Specific Sources (261.31(b)(2)(ii))										
Develop data and documents to support criteria for exemption	0.00	4.00	40.00	6.00	50.00	\$2,664.66	\$0.00	\$0.00	1	50.00
Maintain records	0.00	0.00	0.00	2.00	2.00	\$66.22	\$0.00	\$13.00	1	2.00
Subtotal	0.00	4.00	40.00	8.00	52.00	\$2,730.88	\$0.00	\$13.00	1	52.00
Deletion of Certain Hazardous Waste Codes Following Equipment Cleaning and Replacement (261.35)										
Prepare equipment cleaning or replacement plan	0.00	0.00	24.00	8.00	32.00	\$1,491.04	\$0.00	\$13.00	1	32.00
Prepare and maintain documentation supporting cleaning/replacement of equipment in accordance with plan	0.00	2.00	16.00	9.00	27.00	\$1,326.63	\$0.00	\$1,250.00	1	27.00
Prepare and maintain certification that equipment was cleaned or replaced in accordance with plan	0.00	2.00	0.00	1.00	3.00	\$244.31	\$0.00	\$0.00	1	3.00
Subtotal	0.00	4.00	40.00	18.00	62.00	\$3,061.98	\$0.00	\$1,263.00	1	62.00

Costs

Total Cost/ Year
###
\$79.22
###
###
###
\$244.31
###

EXHIBIT 6

TOTAL ANNUAL ESTIMATED RESPONDENT BURDEN

INFORMATION COLLECTION ACTIVITY	Number of Respondents	Number of Activities	Total Hours/ Year	Total Labor Cost / Year	Total Capital Cost / Year	Total O&M Cost / Year
Reading the Regulations	2603	1	4,555	\$356,208	\$0	\$0
Rulemaking Petitions	varies	2	3,195	\$111,392	\$0	\$210,912
Solid Waste and Boiler Variances	varies	4	3,746	\$191,314	\$0	\$750
Hazardous Waste Exclusions	varies	9	46,658	\$2,390,765	\$0	\$8,549,825
Solid Waste Exclusions	varies	3	4,161	\$101,219	\$0	\$109
Hazardous Waste Listing Exemptions	varies	3	462	\$23,707	\$0	\$99,188
TOTAL ANNUAL BURDEN	varies	22	62,778	\$3,174,604	\$0	\$8,860,784

Three years

188,334 \$9,523,811 \$0 \$26,582,352

z

AVERAGE RESPONDENT BURDEN

Type of Petition or Demonstration	Average Reporting Burden per Respondent (hours/respondent)	Average Record-Keeping Burden per Respondent (hours)	TOTAL Average Reporting Burden (hours)	TOTAL Average Recordkeeping Burden (hours)
				4,555.25
Equivalent Methods Petitions	239.00	1.75	603.00	
Delisting Petition	648.00	1.75	3,047.00	
Solid Waste Variance	121.00	1.75	3,630.00	
Boiler Variance	116.00	1.75	116.00	
Wastewater Exemption	28.00	1.75	28.00	
Nonwastewater Exemption	3.50	2.25	3.50	0.50
Wood Preserving Processes Exclusion	18.50	1.75	202.50	
Mineral Processing Exclusion	0.00	1.75	0.00	
Zinc Fertilizer Exclusion	3.52	3.05	17.25	8.40
Chromium Exemption	28.00	1.75	28.00	
Exemption for Samples	21.00	1.75	945.00	
Exemption for Treatability Study Samples	16.00	5.75	20.00	8.00
Exemption for Treatability Study Samples Undergoing Testing	21.00	2.75	42.00	2.00
Exemption for Waste from Non-Specific Sources	0.00	53.75	0.00	52.00
Equipment Cleaning and Replacement	0.00	63.75	0.00	62.00
Listing Exemption for Organic Dyes and Pigments Production Nonwastewaters	0.00	28.18	0.00	372.00
Exclusion for recycling of Used CRTs	4.90	1.95	4,134.40	27.00

Revisions to Headworks Exclusion	26.50	2.25
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44,684.83	668.50
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**Total
Cost/Year**

\$356,208
\$322,304
\$192,064
\$10,940,590
\$101,328
\$122,873
\$12,035,365

\$36,106,096

Reading the regulations -- all

|

**EXHIBIT 8
ANNUAL ESTIMATED AGENCY BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity						Total Hours and C	
	Leg. \$84.87 /Hour	Mgr. \$82.55 /Hour	Tech. \$48.42 /Hour	Cler. \$32.29 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Number of Respon. or Activ.	Total Hours/ Year
Review of Equivalent Methods Petitions (260.20 and 260.21)								
Review general petition information	0.00	3.00	20.00	0.00	23.00	\$1,216.04	1	23.00
Request additional information if required	0.00	0.00	2.00	1.00	3.00	\$129.12	1	3.00
Enter information into a database	0.00	0.00	6.00	2.00	8.00	\$355.09	1	8.00
Hold meetings	0.00	1.00	8.00	0.00	9.00	\$469.90	1	9.00
Deliberate	0.00	2.00	18.00	0.00	20.00	\$1,036.65	1	20.00
Make a draft determination, and publish draft Federal Register Notice	10.00	3.00	25.00	4.00	42.00	\$2,435.98	1	42.00
Review comments and deliberate	4.00	2.00	10.00	0.00	16.00	\$988.78	1	16.00
Make determination and publish final Federal Register notice	6.00	2.00	24.00	5.00	37.00	\$1,997.82	1	37.00
Subtotal	20.00	13.00	113.00	12.00	158.00	\$8,629.38	1	158.00
Review of Delisting Petitions (260.20 and 260.22)								
Review general petition information	3.60	0.90	59.82	5.40	69.72	\$3,450.35	4	278.86
Request additional information if required	3.60	0.90	18.44	1.80	24.74	\$1,330.62	4	98.95
Enter information into a database	0.00	0.00	7.65	0.00	7.65	\$370.22	4	30.58
Hold meetings	1.35	3.15	3.15	1.35	9.00	\$570.43	4	35.98
Deliberate*	11.24	3.60	26.09	3.60	44.53	\$2,630.63	2	89.06
Make a draft determination, and publish draft Federal Register Notice	0.00	0.00	0.00	0.00	0.00			
Review comments and deliberate	3.60	11.24	44.53	9.00	68.37	\$3,680.03	2	136.73
Review comments and deliberate	7.20	11.24	37.33	0.00	55.77	\$3,346.54	2	111.54
Make determination and publish final Federal Register notice	0.00	0.00	0.00	0.00	0.00			
Make determination and publish final Federal Register notice	7.20	1.80	9.45	1.80	20.24	\$1,274.70	2	40.48
Subtotal	37.78	32.83	206.45	22.94	300.00	\$16,653.51	varies	822.19

**EXHIBIT 8
ANNUAL ESTIMATED AGENCY BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity						Total Hours and C	
	Leg. \$84.87 /Hour	Mgr. \$82.55 /Hour	Tech. \$48.42 /Hour	Cler. \$32.29 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Number of Respon. or Activ.	Total Hours/ Year
Review of Solid Waste and Boiler Variance Demonstrations (260.31(a),(b),(c), 260.32, and 260.33(a))								
Review the demonstrations	0.00	2.20	18.16	0.00	20.36	\$1,060.88	31	631.12
Request additional information if necessary	0.00	0.00	0.55	1.65	2.20	\$79.94	31	68.23
Deliberate and issue draft determination	3.85	1.65	25.31	2.20	33.01	\$1,759.76	31	1,023.44
Publicize draft determination	0.00	0.00	1.65	4.40	6.05	\$222.04	31	187.63
Hold hearing, if required	0.00	0.55	22.01	1.65	24.21	\$1,164.41	31	750.53
Review comments and make final determination	2.20	1.65	23.11	2.20	29.16	\$1,513.10	31	904.04
Subtotal	6.05	6.05	90.79	12.11	115.00	\$5,800.13	31	3,565.00
Review of Hazardous Waste Exclusion Petitions (261.3 and 261.4)								
File nonwastewater notification	0.00	0.00	1.00	1.00	2.00	\$80.70	1	2.00
Review, approve, or deny, and keep records of the notifications and updates	0.00	0.00	2.00	0.25	2.25	\$104.91	20	45.00
Review and keep records of applications	0.00	0.00	0.25	0.25	0.50	\$20.18	0	0.00
Process haz. materials generator notification	0.00	0.00	0.25	0.10	0.35	\$15.33	8	2.80
Process zinc fertilizer manufacturer notification	0.00	0.00	0.25	0.10	0.35	\$15.33	2	0.70
Process zinc fertilizer manufacturer annual report	0.00	0.00	1.00	0.10	1.10	\$51.65	5	5.50
Review requests for quantity increases for treatability study and issue decision	0.00	0.00	3.00	0.00	3.00	\$145.26	1	3.00
Review requests for two-year extension of treatability study and issue decision	0.00	0.00	3.00	0.00	3.00	\$145.26	1	3.00
File notification of testing of treatability sample	0.00	0.00	1.00	1.00	2.00	\$80.70	2	4.00
File annual report on treatability study testing	0.00	0.00	1.00	1.00	2.00	\$80.70	2	4.00
File termination letter of treatability study testing	0.00	0.00	1.00	1.00	2.00	\$80.70	2	4.00
Revisions to the Headworks Exclusion at 261.3(a)(2)(iv)(A), (B), (D), (F) and (G)								
Review site-specific sampling plans	0.00	0.10	0.50	0.00	0.60	\$32.46	604	362.20
Review updated site-specific sampling plans	0.00	0.00	0.15	0.00	0.15	\$7.26	27	4.05
Export Notification for Used CRTs Destined for Recycling (261.39(a)(5))								
Review notification submitted by an exporter of used CRTs to determine whether or not the notification is complete	0.00	0.00	1.00	0.00	1.00	\$48.42	256	256.00
Solicit form exporter, additional information requested by the receiving country	0.00	0.00	0.50	0.10	0.60	\$27.44	26	15.60
Provide, in conjunction with the Department of State, the complete notification to the receiving country	0.00	0.00	0.00	0.16	0.16	\$5.17	256	40.96

**EXHIBIT 8
ANNUAL ESTIMATED AGENCY BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent Per Activity						Total Hours and C	
	Leg. \$84.87 /Hour	Mgr. \$82.55 /Hour	Tech. \$48.42 /Hour	Cler. \$32.29 /Hour	Respon. Hours/ Year	Labor Cost/ Year	Number of Respon. or Activ.	Total Hours/ Year
Forward the receiving/transit country's written consent to the receipt of used CRTs to the exporter	0.00	0.00	0.00	0.16	0.16	\$5.17	0	0.00
Send written notification to the exporter if the receiving/transit country objects to the receipt of the used CRTs or withdraws a prior consent	0.00	0.00	0.50	0.10	0.60	\$27.44	0	0.00
File copies of notifications, consents, and other related documents	0.00	0.00	0.00	0.10	0.10	\$3.23	538	53.80
Export Notification for Used CRTs Destined for Reuse (261.41)								
Review notification submitted by exporter of used CRTs	0.00	0.00	0.50	0.00	0.50	\$24.21	5	2.50
File copies of notification	0.00	0.00	0.00	0.10	0.10	\$3.23	5	0.50
Subtotal	0.00	0.10	16.90	5.52	22.52	\$1,004.76	varies	809.61
TOTAL: AGENCY ACTIVITIES	varies	varies	varies	varies	varies	varies	varies	5,355

* Assumes that five submissions will be withdrawn at the draft determination stage

osts

Total Cost/ Year
\$1,216.04
\$129.12
\$355.09
\$469.90
\$1,036.65
\$2,435.98
\$988.78
\$1,997.82
\$8,629.38
\$13,801.41
\$5,322.47
\$1,480.90
\$2,281.70
\$5,261.27
\$7,360.05
\$6,693.08
\$2,549.40
\$44,750.27

Costs

Total Cost/ Year
\$32,887.36
\$2,478.03
\$54,552.70
\$6,883.37
\$36,096.65
\$46,906.02
\$179,804.14
\$80.70
\$2,098.21
\$0.00
\$122.67
\$25.61
\$258.24
\$145.26
\$145.26
\$161.41
\$161.41
\$161.41
\$19,598
\$196
\$12,395.40
\$723.28
\$1,419.69

osts

Total Cost/ Year
\$0.00
\$0.00
\$1,736.95
\$121.05
\$16.14
39566.59
\$272,750

National Occupational Employment and Wage Estimates
at http://www.bls.gov/oes/oes_emp.htm

per U.S. Department of Labor
 Bureau of Labor Statistics

RESPONDENTS - INDUSTRY LABOR WAGE RATES:

NAICS	LEGAL		
	SOC 23-1011		
Sectors	Lawyers		
	Wage Estimates		
	Median Hourly	Mean Hourly	Mean Annual

UNLOADED RATES: \$78.74
LOADED RATES: **\$131.82**
 by multiplying the average labor rates by 1.6741
 to account for fringe benefits 33.10% and overhead
 (See Below)

AGENCY - STATE GOVERNMENT LABOR WAGE RATES:

NAICS	LEGAL		
	SOC 23-1011 - Lawyers		
Sectors	Lawyers		
	Wage Estimates		
	Median Hourly	Mean Hourly	Mean Annual

99 \$49.71
LOADED RATES: **\$84.87**
 by multiplying the average labor rates by 1.7073
 to account for fringe benefits 34.40% and overhead
 (See Below)

Multiplier for fringe benefits and Overhead

$$= [1 + (\text{Fringe Benefits \%}) / (100\% - \text{Fringe Benefits \%})] \times (1 + \text{Overhead \%})$$

Industry:

Fringe Benefits "All goods-producing" industry group fringe benefits percentage of 33.1% from "T&E"

Overhead

at http://www.bls.gov/schedule/archives/eci_nr.htm

In absence of data specific to industry, applied 12% Federal civilian overhead costs
at http://www.whitehouse.gov/omb/circulars_a076_a76_incl_tech

Agency:

Fringe Benefits

34.4% fringe benefits percentage from "Table 3. State and local government, by n
at http://www.bls.gov/schedule/archives/eci_nr.htm

Overhead

In absence of data specific to state governments, applied 12% Federal civilian overhead
at http://www.whitehouse.gov/omb/circulars_a076_a76_incl_tech

National Cross-Industry --

http://www.bls.gov/oes/current/oes_nat.htm

MANAGEMENT

SOC 11-0000

Management Occupations

Wage Estimates		
Median Hourly	Mean Hourly	Mean Annual

\$63.08
\$105.60

TECHNICAL

SOC 17-3026

Industrial Eng. Technicians

Wage Estimates		
Median Hourly	Mean Hourly	Mean Annual

\$30.52
\$51.09

CLERICAL

SOC 43-9061

Office Clerks, General

Wage Estimates	
Median Hourly	Mean Hourly

\$19.78
\$33.11

and 12%

http://www.bls.gov/oes/current/naics4_999200.htm#b17-0000

MANAGEMENT

SOC 11-0000

Management Occupations

Wage Estimates		
Median Hourly	Mean Hourly	Mean Annual

\$48.35
\$82.55

TECHNICAL

SOC 19-4091

Environmental Science and Professions

Wage Estimates		
Median Hourly	Mean Hourly	Mean Annual

\$28.36
\$48.42

CLERICAL

SOC 43-9061

Office Clerks, General

Wage Estimates	
Median Hourly	Mean Hourly

\$18.91
\$32.29

and 12%

b)

Table 6. Private industry, by major industry group” of the US Bureau of Labor Statistics (BLS) “Employer Costs for Em

Cost factor from Figure C1 of the REVISED February 2008 OMB Circular A-76
i_correction/

Major occupational and industry group” of the US Bureau of Labor Statistics (BLS) “Employer Costs for Employee Co

Overhead cost factor from Figure C1 of the REVISED February 2008 OMB Circular A-76
i_correction/

WORKMAN
SOC 53-7064
Packers and Packagers, Hand

ral

tes
Mean Annual

Wage Estimates		
Median Hourly	Mean Hourly	Mean Annual

\$11.08

\$18.55

ral

tes
Mean Annual

mpensation" (ECEC), December 2010 at

ICR	ICR No.	Respondent Burden	
		Hours (hours/year)	Costs (dollars/year)

2001 Base ICR Renewal 1189.09		20,802	\$2,046,564
Zinc Fertilizers	1189.11	61	\$12,653
TOTAL:		20,863	\$2,059,217

2004 Base ICR, 1189.14 = 1189.09 + 1189.11

2004 Base ICR Renewal 1189.14		21,511	\$2,206,319
Dyes & Pigments	1189.15	563	\$123,776
CRT Recycling	1189.16	5,419	\$269,099
Headworks Exemption	1189.17	45,353	\$8,557,036
TOTAL:		72,846	\$11,156,230

2007 Base ICR, 1189.20 = 1189.14 + 1189.15 + 1189.16 + 1189.17

2007 Base ICR Renewal 1189.20		73,752	11,917,572	Renewed on 7/3/08; to e:
F019 Listing Amendmer 1189.21		34.7	\$2,605.70	
TOTAL:		73,787	\$11,920,178	

2010 Base ICR, 1189.24 = 1189.20 + 1189.21

2010 Base ICR Renewal 1189.24	62,778	### from Exhibit 6
Changes as compared to the OMB Inv	(11,009)	\$115,188 Changes against the a
Increase	(11,009)	\$2,796,050 Changes against the O
		Increase due to increased labor rates

NOTE: Somehow, the F019 Listing the ICR Nr. 801.15 (Generators &

2007 OMB Inventory (per Peggy V	75,929	\$10,243,000	Why different from t
2010 OMB Inventory (per Peggy V	73,787	\$9,239,315	Why different from t

Agency Burden

Hours Costs
(hours/year)(dollars/year)

18,685	\$675,660
7	\$244
<hr/>	
18,692	\$675,904

17,951	\$701,350	
0	\$0	No Agency hour or cost burden
371	\$11,173	
366	\$13,831	
<hr/>		
18,688	\$726,354	

expire on 1/31/12	15,351	\$530,585
	0	\$0
	<hr/>	
	15,351	\$530,585

5,355 \$272,750

above totals (9,996) (\$257,835) against the above totals
MB inventory of approved ICR burdens (see below)

and O&M costs?

**g Amendment ICR applied the 2004 labor rate data used in
Transporters) Supporting Statement, but not the latest data**

the above totals?
the above totals?