U.S. Environmental Protection Agency

Information Collection Request

**Title:** RCRA Subtitle C Reporting Instructions and Forms (Renewal)

**OMB Control Number:** 2050-0024

**EPA ICR Number:** 0976.20

**Abstract:** 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, whichrequire 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.

**Supporting Statement A**

1. **NEED AND AUTHORITY FOR THE COLLECTION**

*Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

The Office of Resource Conservation and Recovery (ORCR) has the responsibility for national implementation and oversight of the hazardous waste program authorized by Subtitle C of the Resource Conservation and Recovery Act (RCRA). In most cases, States serve as primary implementers of the program in lieu of the Federal government. However, in some States, and for certain aspects of the program, the Environmental Protection Agency (EPA) retains all, or some, program implementation responsibility. This collection covers collection activities for Hazardous Waste Reports authorized under RCRA Sections 3002 and 3004, Notification Requirements for Regulated Waste authorized under Section 3010 of Subtitle C of RCRA, and the Hazardous Waste Permit Application authorized under Section 3005 of Subtitle C of RCRA.

**(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. 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. The implementing regulations are found at 40 CFR 262.40(b) and (d); and 262.41(a)(1)-(5), (a)(8).

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. The implementing regulations are found at 264.75(a)-(e) and (j); 265.75(a)-(e) and (j); and 270.30(l)(9).

**(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.

1. **Part A Hazardous Waste Permit Application and Modification**

Section 3005 of Subtitle C of RCRA, as amended, requires any person owning a facility, or any person planning to construct a new facility for the treatment, storage, or disposal of hazardous waste to obtain a permit. 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.

1. **PRACTICAL UTILITY/USERS OF THE DATA**

*Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

**(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. Some of the information provided on this form is available to the public on the RCRAInfo Web. This public-facing website provides the public with non-proprietary information found in the RCRAInfo database. This searchable website can be found at https://rcrapublic.epa.gov/rcrainfoweb/action/main-menu/view. 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.

1. **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.

1. **USE OF TECHNOLOGY**

*Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

All of the forms covered by this ICR are fillable and submittable electronically. For repeat filers, forms are pre-populated, making it easy to update. Furthermore, the Agency has developed software to facilitate the uploading of the information from the forms into the RCRAInfo database, which is the responsibility of the States. States who choose to use the BR Industry App in RCRAInfo have the ability to upload data directly into the database via flat files, which decreases burden.

1. **EFFORTS TO IDENTIFY DUPLICATION**

*Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

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.

1. **MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

*If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

**(1) Hazardous Waste Report**

Small quantity generators (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. However, SQGs 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.

1. **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.

1. **CONSEQUENCES OF LESS FREQUENT COLLECTION**

*Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

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.

1. **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.

1. **GENERAL GUIDELINES**

*Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.*

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

1. **PUBLIC COMMENT AND CONSULTATIONS**

**8a. Public Comment**

*If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.*

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on September 6, 2023 (88 *FR* 60939). The notice indicated that EPA was planning to submit an ICR, “RCRA Subtitle C Reporting Instructions and Forms” (EPA ICR No. 0976.20, 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 November 6, 2023. EPA received no comments on this ICR in response to the *Federal Register* notice.

**8b. Consultations**

*Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

EPA consulted with three organizations (Boeing, Safety Kleen, Steel Dust Recycling, and Polaris Industries) and three states (Massachusetts Department of Environmental Protection, Alabama Department of Environmental Managment and Missouri Department of Natural Resources) 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. The industry consultants indicated that the burden estimates were consistent with what they found, and the state consultants indicated the burden estimates for uploading the information were consistent with past experiences.

1. **PAYMENTS OR GIFTS TO RESPONDENTS**

*Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.*

There are no payments or gifts associated with this collection of information.

1. **ASSURANCE OF CONFIDENTIALITY**

*Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.*

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.

1. **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.

1. **JUSTIFICATION FOR SENSITIVE QUESTIONS**

*Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

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

1. **RESPONDENT BURDEN HOURS & LABOR COSTS**

*Provide estimates of the hour burden of the collection of information. The statement should:*

* *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
* *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
* *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

**12a. Respondents/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 |

**12b. Information Requested****/Activities/Burden Estimates**

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 by States). Only large quantity generators (LQGs) and treatment, storage and disposal facilities (TSDFs) are required to complete the Hazardous Waste Report. Based on 2021 Hazardous Waste Report data, EPA estimates that the total number of respondents to the 2023 Hazardous Waste Report will be 23,955 (22,533 private and 1,422 State and local government). EPA estimates that the annual estimated burden will be 228,858 hours.

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. EPA estimates 54 states and territories participate and the annual estimated burden will be 319,854 hours.

***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. EPA estimates that all respondents will complete and submit a Site ID Form with the Hazardous Waste Report. Annualized over the two-year report cycle, this results in 11,978 respondents preparing and submitting a Site ID Form each year. EPA estimates the burden per form is 0.84 hours, with an annual total burden of 10,062 hours.

***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). EPA estimates that respondents will

submit a total of 302,819 Forms GM with the Hazardous Waste Report. Annualized over the

two-year report cycle, this results in 151,410 Forms GM each year (i.e., 145,677 forms from

private sector facilities and 5,733 forms from State and local government facilities). EPA

estimates the burden per form is 0.39 hours, with an annual total burden of 59,050 hours.

***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. 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). EPA estimates that respondents will submit a total of 1,462,896 Forms WR with the

Hazardous Waste Report. Annualized over the two-year report cycle, this results in 731,448

Forms WR each year (i.e., 731,251 forms from private sector facilities and 197 forms from

State and local government facilities). EPA estimates the burden per form is 0.12 hours, with an

annual total burden of 87,774 hours

***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. EPA estimates that

500 facilities complete this form and the estimated burden per form is 0.05 hours, with an annual total burden of 25 hours.

***Submit the Biennial Report to State/Region***

EPA expects each respondent, 11,978 facilities per year (i.e., 11,267 private facilities and 711 state or local government facilities), to submit the report to the appropriate State or Region.

***Maintain a Copy of Each Form***

EPA expects facilities to retain an estimated 1,789,670 (i.e., 23,955 Site ID Forms + 302,819 Forms GM + 1,462,896 Forms WR) forms each year (of those 1,776,389 forms are from private sector facilities and 13,281 forms are from State and local government facilities).

***Key Entry of Report Submissions***

EPA estimates that State agencies will only need to key enter data 8% of the Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) that are completed manually by facilities.

***Perform Quality Assurance***

EPA expects State agencies to perform data quality assurance on all Hazardous Waste Report forms (i.e., Site ID Form, Form GM, and Form WR) submitted by facilities.

**II. 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.

EPA estimates that 70 facilities (62 private and 8 State and local government facilities) complete EPA Form 8700-12 and the estimated burden per form is 1.5 hours, with an annual total burden of 105 hours.

State agencies review the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) and enter the information into RCRAInfo. EPA estimates 39 states participate and the annual estimated burden is 142 hours.

**(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).

EPA estimates that, each year, 7,706 facilities (i.e., 6,527 private sector facilities and 1,179 State and local government facilities) will submit an initial notification of hazardous waste activity under RCRA Section 3010. EPA also estimates that, each year, 37,472 facilities (i.e., 35,044 private sector facilities and 2,428 State and local government facilities) will submit a subsequent notification associated with these requirements. The estimated burden per form is 1.5 hours, with an total annual burden of 67,767 hours.

State agencies review completed EPA Form 8700-12 and enter the information into RCRAInfo. In addition, if applicable, the state will generate EPA Identification Number and send EPA Identification Number to facility. EPA estimates 52 states and territories participate and the annual estimated burden is 133,382 hours.

**(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.

EPA estimates that 58 facilities (17 private and 41 State and local government facilities) complete EPA Form 8700-12 and the estimated burden per form is 1.5 hours, with an annual total burden of 87 hours.

State agencies review the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) and enter the information into RCRAInfo. EPA estimates 19 states participate and the annual estimated burden is 176 hours.

*(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.

EPA estimates that 63 facilities (44 private and 19 State and local government facilities) complete EPA Form 8700-12 and the estimated burden per form is 1.5 hours, with an annual total burden of 95 hours.

State agencies review the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) and enter the information into RCRAInfo. EPA estimates 19 states participate and the annual estimated burden is 616 hours.

**(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.

EPA estimates that, each year, 112 facilities (i.e., 91 private sector facilities and 21 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, 990 facilities (i.e., 864 private sector facilities and 126 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. The estimated burden per form is 1.5 hours, with a total annual burden of 1,653 hours.

State agencies review the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) or letter and enter the information into RCRAInfo. In addition, if applicable, the state will generate EPA Identification Number and send EPA Identification Number to the facility. EPA estimates 45 states participate and the annual estimated burden is 3,817 hours.

**(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.

EPA estimates that, each year, 77 facilities (i.e., 75 private sector facilities and 2 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, 646 facilities (i.e., 601 private sector facilities and 45 State and local government facilities) will submit a subsequent notification of universal waste activity under 40 CFR Part 273, Subpart C. The estimated burden per response is 1.5 hours, with an annual total burden of 1,085 hours.

State agencies review the RCRA Subtitle C Site Identification Form (EPA Form 8700-12) or letter and enter the information into RCRAInfo. Ff applicable, the state will generate EPA Identification Number and send EPA Identification Number to facility. EPA estimates 21 states participate and the annual estimated burden is 1,891 hours.

1. **Part A Hazardous Waste Permit Application and Modification**
2. **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.

*(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).

*(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.

*(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.

State agencies 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, and notify applicant of deficiency in the Part A Permit Application. State agency activities associated with Part A Permit Applications include 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, and entering information into the RCRAInfo database. State agencies may also identify deficiencies in the Part A Permit Application.

1. **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.

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.

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.

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.

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.

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).

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.

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.

EPA estimates that, each year, State agencies will receive 4 initial 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. The respondent burden is estimated to be 438 hours annually and the burden on State agencies 191 hours annually. In addition, EPA estimates that, each year, State agencies will receive 23 revised Part A Permit Applications. State agencies will need to review the applications and enter the Part A Permit Application information into RCRAInfo. The respondent burden is estimated to be 438 hours annually and the burden on State agencies 191 hours annually.

**Labor Costs**

**Private Sector Facilities**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of $164.90 for legal staff, $97.45 for managerial staff, $72.61 for technical staff, and $43.67 for clerical staff. These respondent labor costs were obtained from the previously approved ICR and updated to 2023 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.[[1]](#footnote-3)

**State and Local Government Facilities and Agencies**

EPA estimates an average hourly respondent labor cost (including fringe and overhead) of $75.28 for legal staff, $70.66 for managerial staff, $42.28 for technical staff, and $26.96 for clerical staff. These respondent labor costs were obtained from the previously approved ICR and updated to 2023 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.[[2]](#footnote-4)

1. **Respondent CAPITAL AND O&m CostS**

*Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

*The cost estimate should be split into two components: (a) a total capital and start-up cost*

*component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.*

*If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.*

*Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

**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.

**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; however, due to electronic submission, only 8% of submissions to the BR are hard copy mailings.

1. **AGENCY** **COSTS**

*Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

EPA estimates an average hourly labor cost of $102.11 for legal staff (GS15, Step 5), $90.10 for managerial staff (GS-15, Step 1), $64.82 for technical staff (GS-13, Step 1), and $27.65 for clerical staff (GS-06, Step 1). To derive these hourly estimates, EPA referred to the General Schedule (GS) Salary Table 2023.[[3]](#footnote-5) 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.

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

EPA estimates that the Agency will incur a cost of $349,713 in developing computer capabilities required to compile national data, $27,977 in preparing the National Report, and $48,961 in storing the national data. These costs were obtained from the previously approved ICR and updated to 2023 levels using Consumer Price Indexes developed by the Bureau of Labor Statistics.[[4]](#footnote-6) EPA estimates the annual EPA burden to be 6,694 hours and $426,651.

1. **REASONS FOR CHANGE IN BURDEN**

*Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.*

The total burden for the current ICR (EPA ICR Number 0976.19) is 809,382 hours. The total burden for this renewal (EPA ICR Number 0976.20) is 729,728 hours. This represents a decrease of 79,654 hours. The breakdown of this burden is explained below. Despite estimated increases for the Notification and Part A, there were decreases for the Hazardous Waste Report. See breakdown below.

**(1) Hazardous Waste Report**

**(a) Facility Burden**

For facilities, the annual burden estimate for the 2021 Hazardous Waste Report (EPA ICR Number 0976.19) was 251,173 hours. The annual burden estimate for the 2023 Hazardous Waste Report is 228,857 hours. This represents a decrease of 22,316 hours. This decrease is due to an adjustment in the burden associated with submitting BR data. All but 9 States have opted into using the BR Industry App, which reduces the burden associated with uploading data for the BR report.

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the 2021 Hazardous Waste Report (EPA ICR Number 0976.19) was 378,517 hours. The annual burden estimate for the 2023 Hazardous Waste Report (EPA ICR Number 0976.20) is 319,854 hours. This represents a decrease of 58,663 hours. This decrease is due to an adjustment to State burden for uploading data. All but 9 States have opted into using the BR Industry App, which reduces the burden associated with entering data for the BR report.

**Notification of Regulated Waste Activity**

**(a) Facility Burden**

For facilities, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.19) was 39,338 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.20) is 40,959 hours. This represents an increase of 1,621 hours. This increase is due to an increase in the expected number of notifications for using alternative standards for episodic generation.

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.19) was 139,820 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.20) is 140,024 hours. This represents an increase of 204 hours. This increase is explained above.

1. **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 0976.19) was 369 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.20) is 438 hours. This represents an increase of 69 hours. This increase is due to an increase in the number of permit modifications.

**(b) State Agency Burden**

For State agencies, the annual burden estimate for the previously approved ICR (EPA ICR Number 0976.19) was 164 hours. The annual burden estimate for this current ICR (EPA ICR Number 0976.20) is 191 hours. This represents an increase of 27 hours. This increase is explained above.

1. **PUBLICATION OF** **DATA**

*For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

Every even numbered year, facilities submit their completed Hazardous Waste Report forms to the States (except for in Alaska and Iowa, who submit to Region 10 and 7 respectively) by March 1st (40 CFR 262.41(b)). States begin loading the data into the RCRAInfo system database as soon as they receive the data and have until July of that year to complete these data loads. This data is not available to the public at this point. States can request a State Summary Report of their data from EPA headquarters, which allows for data quality review. Any data quality issues must be corrected in the RCRAInfo system by November of the same year. By December, EPA makes available the final data on the RCRAInfo Web, which is publicly available. EPA’s Hazardous Waste Report national implementation schedule is outlined below.

**Hazardous Waste Report National Implementation Schedule**

| **Activity** | **Tentative Completion Date** |
| --- | --- |
| Facilities submit completed forms to Regions/States | March 2024 |
| Regions/States begin loading the data into RCRAInfo | April 2024 |
| Regions/States complete data loads | July 2024 |
| Last day to request a State Summary Report from EPA Headquarters | October 2024 |
| Regions/States complete loading corrected (if necessary) data into RCRAInfo | November 2024 |
| EPA Headquarters makes Final National Biennial data available on RCRAInfo Web (public Web site) | December 2024 |

1. **DISPLAY OF EXPIRATION DATE**

*If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

EPA is not seeing approval to not display the expiration date for OMB approval of the information collection.

1. **CERTIFICATION STATEMENT**

*Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”*

There are no exceptions to the topics of the certification statement.

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>. [↑](#footnote-ref-3)
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>. [↑](#footnote-ref-4)
3. U.S. Office of Personnel Management, “2023 General Schedule (Base),” Hourly Rate. [↑](#footnote-ref-5)
4. Bureau of Labor Statistics, “Table 24. Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all.” [↑](#footnote-ref-6)