

## **PART B OF THE SUPPORTING STATEMENT**

### **1. QUESTIONNAIRE RATIONALE**

The Container Reconditioning Facilities (CRF) Questionnaire will provide information essential to establishing a need for and developing, as necessary, revised Resource Conservation and Recovery Act (RCRA) regulations or other, non-regulatory options. A questionnaire for the Container/Drum Reconditioning industry is an essential portion of the decision-making process, necessary for EPA to determine if the current regulations or voluntary actions remain appropriate and, if warranted, to inform development of new regulations or voluntary actions. The CRF Questionnaire will generate a data set that characterizes drum reconditioning acceptance, storage and handling practices; air emissions from drum furnaces and control techniques; wastewater generation, treatment, and discharge practices; solid and hazardous waste management practices; and emergency response, training and permitting practices from drum reconditioning facilities in the United States.

#### **1(a) Population of Interest**

No previous regulatory efforts have been undertaken on drum reconditioning facilities, and there is no pre-existing, comprehensive, national database available to identify subsets of the population. To obtain valuable information on the drum reconditioning industry's drum acceptance, storage, handling practices, air emissions data, and waste and wastewater generation and discharge practices, EPA has compiled a list of all known drum reconditioning facilities to receive a blanket census.

EPA estimates the target population to consist of all known (216) drum reconditioning facilities in the United States, as identified through trade organizations and industry research.

#### **1(b) Response rate/Non-response**

Non-response is expected to be low for questionnaires sent under the authority of RCRA 3007 because response is mandatory and enforceable. EPA will employ several measures to reduce non-responses. The cover letter and instructions will explain the legal authority, responsibility to respond, reasons for the questionnaire, and penalty for nonresponse. Delivery or non-delivery of cover letters will be tracked using Federal Express or other traceable delivery option; thus, signatures of the recipients will be required to confirm receipt. E-mail and telephone helplines will be operated while the questionnaire is in the field so that technical, financial, and administrative questions can be addressed. Recipients not responding to the questionnaire by the deadline date may be telephoned or notified again by mail to encourage response, to answer questions, and to determine the reason(s) for the nonresponse.

Most of the underlying assumptions in this ICR (e.g., burden hour estimates) were initially based on internal consultations conducted with EPA offices that have conducted similar collections and with subject matter experts on ICRs. These assumptions and the calculations that depend on them have been updated following consultation with respondents and/or their representatives (e.g., trade groups), which took place after submission of the first Federal Register Notice for this ICR.

The design and implementation of the questionnaire will employ several quality assurance techniques to reduce the frequency of errors and submission of incomplete responses caused by respondent misunderstanding and misinterpretation of hardcopy instructions (the electronic version of the questionnaire will employ programming intended to deter incomplete submissions). These techniques include the following:

- Review of question language for ambiguity and clarity.
- Use of an easily followed sequence of questions and stopping points.
- Avoidance of questions requiring an open-ended response, when possible.
- Provision of a limited number of carefully considered responses to each question.
- Provision of clear definitions of units of measurement and of technical terms.
- Provision of clear instructions with references to the definitions.
- Provision of helplines via email and a toll-free number to assist respondents.
- Review of responses by engineers, scientists, and economists who will telephone respondents to obtain missing information and resolve problems and inconsistencies.
- Use of a web-based questionnaire platform (Qualtrics) to require completion of all required questions.
- Provision of the Qualtrics platform to require specific response formats (e.g., numeric values where a number is requested) and acceptable value ranges.
- Use of double-entry keypunch verification on any hardcopy submittals.

## **2. COLLECTION OF INFORMATION**

### **2(a) Stratification/Sample Selection**

As the questionnaire is to be distributed as a census, intended for response by all drum reconditioning facilities, no stratification or sampling scheme has been designed. The main data sources that contributed to the industry population are described in Part A Section 4 Efforts to Identify Duplication.

## **3. ESTIMATION PROCEDURE**

As the questionnaire is designed as a census, no sample size estimation is needed. However, there will be some nonresponse; thus, EPA will not have perfect information and will analyze data quality after results are received. The typical non-response rate for mandatory EPA questionnaires is 10 percent. A survey of this industry has not been undertaken previously and no comprehensive industry list is available. However, based on preliminary research into the universe of industrial container reconditioners and their operating status, EPA estimates that 40 percent of the facilities are likely closed and will not respond, 30 percent of facilities will be non-applicable for some parts of the questionnaire, and the remaining 30 percent will provide full responses.

#### **4. ACCURACY/PRECISION**

The questionnaire is being distributed as a census; therefore, no estimation of sample size is needed. 216 facilities will be requested to complete the questionnaire.

#### **5. SPECIALIZED SAMPLING PROCEDURES**

No special sampling procedures are planned for this questionnaire.

#### **6. DATA COLLECTION**

This will be a single incident data collection; no periodic data collection is planned at this stage. Under this ICR, EPA intends to conduct a single questionnaire of the drum reconditioning industry. The collection methods for this effort have been described previously in this supporting statement.

#### **7. RESPONSE RATE/NON-RESPONSE/DATA UTILITY**

##### **7(a) Response Rate**

EPA expects that the response rate will be relatively high among open facilities for this mandatory questionnaire effort, which will be conducted under the authority of RCRA 3007, because response is mandatory and enforceable. The sample size for the questionnaire is 216 facilities, with an expectation that approximately 130 of these facilities are currently operating. The typical non-response rate for mandatory EPA questionnaires is 10 percent. EPA would strive to improve the response rate via reminder letters, emails, and/or telephone calls. Furthermore, after receiving the responses, EPA intends to determine whether it is necessary to adjust the questionnaire weights based on the actual non-response rate and to review publicly available information to determine if non-respondents appear to have different characteristics than respondents. EPA would examine these characteristics both for the entire industry and for subgroups in the analyses. For any differences, EPA intends to investigate the major causes, and to factor any relevant differences into interpretation of the survey results.<sup>1</sup> At a minimum, EPA will review information about non-respondent facilities to ensure that non-response is likely due to the facility being closed.

##### **7(b) Non-response**

EPA recognizes that some non-response is unavoidable, and in past questionnaire efforts, EPA has waived the duty to respond in extreme and rare cases (e.g., natural disasters) which also might occur for this survey effort. As noted throughout this supporting statement, EPA will implement efforts to reduce non-response, including use of an easy-to-use format, operating helplines, and following up with potential non-respondents.

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<sup>1</sup> Bias is the difference between the expected value of an estimate and the true value of a parameter or quantity being estimated. If the data collection process generates estimates that are consistently (or on average) above or consistently below the true value, the data collection process is biased

### **7(c) Burden Reduction**

EPA designed the questionnaire to include burden-reducing features. It contains initial screening questions that direct respondents that do not qualify as currently operating drum reconditioning facilities to indicate their status and then submit their initial responses without the need to respond to the remaining questions. The sections within the questionnaire also contain screening questions which direct respondents to skip questions or whole sections that reference activities or operations that are not conducted at the facility. The questionnaire also groups similar topic questions together and will offer drop-down menu and checkbox selections to simplify responses, thus minimizing the number of text responses requiring input.

The questionnaire consists of 64 questions and should not require a burden of more than 18 hours (on average) for each facilities' respondents to complete, verify, and submit. EPA will implement the questionnaires online which will facilitate access and completion.

For those respondents without internet access, the notification letter will inform recipients how to request a hardcopy questionnaire that can then be completed and mailed to EPA's contractor for input into the electronic system. EPA therefore concludes that completing the questionnaires does not represent an overly burdensome task.

### **7(d) Data Utility**

The data collected through this ICR will serve to update current information, fill in missing data, and profile the universe of drum reconditioning facilities with sufficient information to support any potential future development of non-regulatory and regulatory options, including revising the RCRA regulations. Subsequently, if EPA pursues a new or revised rulemaking, data will be used to conduct further analyses of the drum reconditioning industry and support rulemaking analyses.

## **8. TESTS OF PROCEDURES**

EPA does not intend to pre-test the questionnaires. While EPA develops different questionnaires for each industry, there are common elements for all industries. The questionnaires collect the same basic data such as information about facility processes, wastewater generation and discharge practices, and air emissions. Thus, when EPA develops a questionnaire for a particular industry, it generally tailors the questions for specific terms and processes used by that industry.

In past years, EPA has relied predominantly on active participation by trade groups and their members in reviewing the questionnaires. In EPA's experience, such collaboration generally tends to better reflect the industry at large than pre-tests. As discussed in Part A of this supporting statement, EPA engaged trade associations and industry experts regarding this data collection. For this reason, EPA considers additional review through the pre-test process to be unnecessary for this industry.

## **9. CONTACT INFORMATION**

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