

Respondent Universe Estimates

Respondent Universe	Facility Code(s)	Respondent Universe Estimate for ICR
Generators that will participate in the transfer-based exclusion in 40 CFR 261.4(a)(24)	06	160
Generators that accumulate more than 6,000 kg of hazardous secondary material		134
Generators that accumulate less than 6,000 kg of hazardous secondary material		26
Reclaimers and Intermediate Facilities expected to report as reclaimers receiving hazardous secondary material from off-site	07, 08	33
Reclaimers and intermediate facilities WITH permitted and interim status units		21
Reclaimers and intermediate facilities WITHOUT permitted and interim status units		12
Generators expected to reclaim hazardous secondary material on-site or transfer hazardous secondary material to a reclaimer within the same company	01, 02	192
Generators that accumulate more than 6,000 kg of hazardous secondary material		176
Generators that accumulate less than 6,000 kg of hazardous secondary material		16
Generators expected to manage hazardous secondary material under a tolling arrangement	05	1
Generators that accumulate more than 6,000 kg of hazardous secondary material		1
Generators that accumulate less than 6,000 kg of hazardous secondary material		0
Facilities that will re-submit a non-waste determination petition as a result of the provision at 40 CFR 260.33(d) that non-waste determination should be effective for a fixed term not to exceed ten years	20, 21	0
Facilities that will re-submit a variance petition as a result of the provision at 40 CFR 260.33(d) that variances should be effective for a fixed term not to exceed ten years	04, 15, 16, 17, 18, 19	1
Generators expected to generate and reclaim their hazardous secondary materials under the remanufacturing exclusion	13	0
Facilities expected to conduct recycling/reuse activities under the six pre-2008 DSW exclusions	Not Applicable	4,300
Exporters will complete a notification to EPA prior to shipment, keep copies of notifications and Acknowledgements of Consent to Export, and submit an annual report	09	9

Assumptions

Assumption	Value
Percent of generators that will have an emergency incident	1.7%
Percent of generators that will amend their contingency plans	10%
Generators that will repeat reasonable efforts at least every three years using and outside vendor	0
Generators that will repeat preparation of legitimacy documentation at least every three years - using in-house employee audit	0
Generators that will repeat preparation of legitimacy documentation at least every three years - using outside vendor	0
Generators that will repeat preparation of legitimacy documentation at least every three years - using readily available information	0
Generators that will make documentation available upon request by a regulatory authority within 72 hours, or within a longer period of time as specified by the regulatory authority	5
Variance applications under 40 CFR 260.31(c)	4
Re-Application for a Variance in the Event of a Change	1
Applications for Non-Waste Determination	7
Re-Application for Non-Waste Determination	0
Remanufacturing exclusion petition process	0.04
Maintain records of shipments	3.5
Generators that will label or record in a log materials being stored in tanks and containers prior to re-manufacturing	1
Generators no speculative accumulation	0
Reclaimers that will label or record in a log materials being stored in tanks and containers prior to re-manufacturing	1

Labor Rates

Private Sector

Labor Category	U.S. Bureau of Labor Statistics Standard Occupational Code	Hourly Mean Wage ^a	Adjustment Factor ^b	Fringe Benefits Cost Factor ^c
A	B	C	D	E
1. Legal	23-1011 Lawyers	\$93.72	1.045	1.294
2. Managerial	11-1021 General & Operations Managers	\$63.90	1.045	1.294
3. Technical	17-2081 Environmental Engineers	\$54.44	1.045	1.294
4. Clerical	43-9061 Office Clerks, General	\$21.83	1.045	1.294

^a U.S. Bureau of Labor Statistics, “May 2024 National Occupational Employment and Wage Estimates,”.

^b U.S. Bureau of Labor Statistics, “Table 5. Employment Cost Index for total compensation, for private industry workers, by occupation and industry series (not seasonally adjusted)”.

^c U.S. Bureau of Labor Statistics, “Table 9. Private industry workers, by major occupational group: employer costs per hour worked for en percentage of total compensation”.

^d The overhead cost factor was obtained from the previously approved ICR.

Operation and Maintenance Costs

Item	Cost	Data Source
Postage		
Regular mail	\$0.74	https://pe.usps.com/text/dmm300/Notice123.htm
Certified mail	\$5.30	https://pe.usps.com/text/dmm300/Notice123.htm
Registered mail	\$19.70	https://pe.usps.com/text/dmm300/Notice123.htm
Sampling and analytical costs for a hazardous secondary material characterization	\$407	Cost in previously approved ICR (\$369) adjusted to Price Indices.
Making copies of plans	\$0.14	Cost in previously approved ICR (\$0.13) adjusted to Price Indices.

Long distance phone call	\$7.31	Cost in previously approved ICR (\$6.26) adjusted 1 Price Indices.		
Prepare and submit a re-application and to provide additional information on whether partial reclamation is substantial	\$34.44	Cost in previously approved ICR (\$31.20) adjusted Price Indices.		
Preparation of an initial variance application	\$34.35	Cost in previously approved ICR (\$31.11) adjusted Price Indices.		
Re-application or renewal of the variance	\$17.18	Cost in previously approved ICR (\$15.56) adjusted Price Indices.		
Hiring an outside auditor to conduct a reasonable efforts audit (for generators using the transfer-based exclusion)	\$4,656	Cost in previously approved ICR (\$4,217) adjusted Price Indices.		
In-house employee audit (for generator-controlled exclusion)	\$861	Cost in previously approved ICR (\$780) adjusted to Price Indices.		
Hiring an outside vendor for preparation of legitimacy documentation	\$4,306	Cost in previously approved ICR (\$3,900) adjusted Price Indices.		

Federal, State, and Local Government

Overhead Cost Factor ^d	Loaded Average (Mean) Hourly Wage Rate
F	G = [C x D x E x F]
1.336	\$169.31
1.336	\$115.44
1.336	\$98.35
1.336	\$39.44

Labor Category	U.S. Bureau of Labor Statistics Standard Occupational Code
A	B
1. Legal	23-1011 Lawyers
2. Managerial	11-1021 General & Operations Managers
3. Technical	17-2081 Environmental Engineers
4. Clerical	43-9061 Office Clerks, General

id industry, continuous occupational and

mployee compensation and costs as a

^a U.S. Bureau of Labor Statistics, “May 2024 National Industry-Specific Occupation

^b U.S. Bureau of Labor Statistics, “Table 7. Employment Cost Index for total comp occupational and industry series (not seasonally adjusted)”.

^c U.S. Bureau of Labor Statistics, “Table 5. State and local government workers, by costs as a percentage of total compensation”.

^d The overhead cost factor was obtained from the previously approved ICR.

e
m? gl=1*1h1rbud* ga*MTgzODQzMDI
m? gl=1*1h1rbud* ga*MTgzODQzMDI
m? gl=1*1h1rbud* ga*MTgzODQzMDI
o 2025 dollars using BLS Consumer
to 2025 dollars using BLS Consumer

to 2025 dollars using BLS Consumer	
I to 2021 dollars using BLS Consumer	
I to 2021 dollars using BLS Consumer	
I to 2021 dollars using BLS Consumer	
I to 2021 dollars using BLS Consumer	
o 2021 dollars using BLS Consumer	
I to 2021 dollars using BLS Consumer	

Hourly Mean Wage ^a	Adjustment Factor ^b	Fringe Benefits Cost Factor ^c	Overhead Cost Factor ^d	Loaded Average (Mean) Hourly Wage Rate G = [C x D x E x F]
C	D	E	F	
\$66.00	1.033	1.383	1.336	\$125.97
\$65.44	1.033	1.383	1.336	\$124.90
\$50.59	1.033	1.383	1.336	\$96.56
\$23.17	1.033	1.383	1.336	\$44.22

al Employment and Wage Estimates; NAICS 999000 - Federal, State, and Local Government.

ensation, for State and local government workers, by occupation and industry, continuous

/ major occupational group: employer costs per hour worked for employee compensation and

EXHIBIT 1
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
OFF-SITE TRANSFER BASED EXCLUSION FOR HAZARDOUS SECONDARY MATERIAL			
Emergency Preparedness and Response			
Generators that accumulate less than 6,000 kg of hazardous secondary material			
Personnel Training			
Collect job-related data	0	0	0.5
Maintain information at facility	0	0	0
Emergency Procedures			
Observe scene of hazardous waste discharge	0	0	0.5
Report by phone requested data items to NRC	0	0	0.5
Document that local officials decline to enter into arrangements for coordinating response	0	0	0.1
Post emergency information by phone	0	0	0
Generators that accumulate more than 6,000 kg of hazardous secondary material			
Contingency Planning			
Collect data required in contingency plan	0	0	3.35
Document whether authorities decline arrangement	0	0	0
Write contingency plan	0	0	7.5
Maintain contingency plan	0	0	0
Submit contingency plan to relevant emergency centers	0	0	0
Amend contingency plan when appropriate	0	0	5
Emergency Procedures			
Collect information	0	0	0.22
Emergency reporting	1.28	0	0.9
Notifying/coordination with authorities	0	0.1	0.9
Reasonable Efforts Environmental Audit For Generators Under 40 CFR 261.4(a)(24)			
Generators			
Conduct reasonable efforts for intermediate facilities and reclaimers and prepare certification statement using outside vendor	0	2	4
Repeat reasonable efforts at least every three years using and outside vendor	0	2	4
Maintain documentation and certification available upon request by a regulatory authority	0	0	0

EXHIBIT 1 (CONTINUED)
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
Financial Assurance (40 CFR Part 261, Subpart H) under the Transfer-Based Exclusion			
Reclaimers			
Collect data for cost estimate	0	0	5
Prepare cost estimate	0	0	5
Obtain and submit documentation of financial assurance	0	0	2
Receipt Confirmations			

Generators			
Maintain at the generating facility for no less than three (3) years records of all off-site shipments of hazardous secondary materials	0	0	0
Maintain at the generating facility for no less than three (3) years confirmations of receipt	0	0	0
Reclaimers			
Send to the hazardous secondary material generator confirmations of receipt for all off-site shipments of hazardous secondary materials	0	0	0
HAZARDOUS SECONDARY MATERIAL GENERATED AND RECLAIMED UNDER THE CONTROL OF THE C			
Recordkeeping for the Tolling Provision			
Tolling contractor must maintain at its facility for no less than three years records of all hazardous secondary materials received pursuant to the written contract with the tolling manufacturer.	0	0	0
Tolling manufacturer must maintain at its facility for no less than three years records of hazardous secondary materials shipped pursuant to its written contract with the tolling contractor.	0	0	0
Legitimacy documentation			
Prepare documentation statement - using in-house employee audit	0	2	14
Prepare documentation statement - using outside vendor	0	2	4
Prepare documentation statement - using readily available information	0	2	4
Repeat at least every three years - using in-house employee audit	0	2	14
Repeat at least every three years - using outside vendor	0	2	4
Repeat at least every three years - using readily available information	0	2	4
Maintain for a minimum of three years documentation	0	0	0
Make documentation available upon request by a regulatory authority within 72 hours, or within a longer period of time as specified by the regulatory authority	0	0	0

EXHIBIT 1 (CONTINUED)
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
Emergency Preparedness and Response			
Generators that accumulate less than 6,000 kg of hazardous secondary material			
Personnel Training			
Collect job-related data	0	0	0.5
Maintain information at facility	0	0	0
Emergency Procedures			
Observe scene of hazardous waste discharge	0	0	0.5
Report by phone requested data items to NRC	0	0	0.5
Document that local officials decline to enter into arrangements for coordinating response	0	0	0.1
Post emergency information by phone	0	0	0
Generators that accumulate more than 6,000 kg of hazardous secondary material			
Contingency Planning			
Collect data required in contingency plan	0	0	3.35
Document whether authorities decline arrangement	0	0	0
Write contingency plan	0	0	7.5
Maintain contingency plan	0	0	0

Submit contingency plan to relevant emergency centers	0	0	0
Amend contingency plan when appropriate	0	0	5
Emergency Procedures			
Collect information	0	0	0.22
Emergency reporting	1.28	0	0.9
Notifying/coordination with authorities	0	0.1	0.9
Certifications for Hazardous Secondary Material Generated and Reclaimed Under the Control of the Generator			
Prepare the certification	0	0.02	0

EXHIBIT 1 (CONTINUED)
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
SOLID WASTE VARIANCES AND NON-WASTE DETERMINATIONS			
VariANCES			
Variance from Classification as a Solid Waste (260.31(c) and 260.33(a))			
Provide information on whether the degree of partial reclamation the material has undergone is substantial.	0	0	40
Provide information on whether the partially-reclaimed material has sufficient economic value that it will be purchased for final reclamation	0	0	16
Describe whether the partially-reclaimed material is a viable substitute for a product or intermediate, produced from virgin or raw materials, which feeds subsequent production steps.	0	0	40
Examine whether there is a guaranteed end market for the partially-reclaimed material	0	0	20
Describe whether the partially-reclaimed material is handled to minimize loss	0	0	6
Notice and Potential Re-Application for a Variance in the Event of a Change			
Prepare and submit a re-application	0	0	75
Submit a Re-Application at Least Every 10 Years			
Re-apply for a variance every 10 years	0	0	75
Non-Waste Determinations			
Application for Non-Waste Determination			
Prepare and submit an application	4	4	130
Change to Non-Waste Determination Process			
Demonstrate respondent cannot or should not meet the existing DSW exclusions	0	0	20
Re-Application for Non-Waste Determination			
Prepare and submit a re-application	2	2	65

EXHIBIT 1 (CONTINUED)
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
REMANUFACTURING EXCLUSION			
Petition Process			

Prepare and submit petition to add certain chemicals, industries, and/or chemical function uses to the re-manufacturing criteria	4	4	130
Sampling and analytical costs for hazardous secondary material characterization	0	0	2
Exclusion Conditions			
Generator			
<i>Re-manufacturing Plan</i>			
Make advance arrangements with re-manufacturer	0	0	1.5
Prepare re-manufacturing plan jointly with re-manufacturer	0	0.1	0.3
Maintain re-manufacturing plan	0	0	0
Submit re-manufacturing plan upon request	0	0	0
<i>Record of Shipments and Confirmations of Receipts</i>			
Maintain records of shipments for a period of three years from the dates of shipments.	0	0	0
Maintain records of confirmations of receipts for a period of three years from the dates of shipments.	0	0	0
<i>Management in Tanks and Containers</i>			
Label or record in a log materials being stored in tanks and containers prior to re-manufacturing	0	0	0.25
<i>No Speculative Accumulation</i>			
Label containers in satellite accumulation area with start date	0	0	0.25
Label containers in accumulation area with start date	0	0	0.25
Inventory logs must demonstrate that at least 75% by weight or volume of material being recycled is transferred to a different site for recycling in a calendar year.	0	0	0.25
Re-Manufacturer			
<i>Re-manufacturing Plan</i>			
Make advance arrangements with hazardous secondary material generator	0	0	1.5
Prepare re-manufacturing plan jointly with generator	0	0.1	0.3
Maintain re-manufacturing plan	0	0	0
Submit re-manufacturing plan upon request	0	0	0
<i>Record of Shipments and Confirmations of Receipts</i>			
Maintain records of shipments for a period of three years from the dates of shipments.	0	0	0
<i>Management in Tanks and Containers</i>			
Label or record in a log materials being stored in tanks and containers prior to re-manufacturing	0	0	0.25

EXHIBIT 1 (CONTINUED)

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN ^a

	Hours per Respondent Activity		
	Legal @ \$169.31/hr	Managerial @ \$115.44/hr	Technical @ \$98.35/hr
RECORDKEEPING FOR SPECULATIVE ACCUMULATION			
Prepare procedures ensuring waste is stored no more than one year	0	0	1
Document that storage procedures are satisfied	0	0	0.25
Prepare a description of waste generation and waste management practices	0	0	1.5
Document that the unit is emptied at least once a year	0	0	1

Label containers in accumulation area with start date	0	0	1
Label containers in satellite accumulation area with start date	0	0	0.5
EXPORT REQUIREMENTS			
Submit notification electronically	0	1	2
Maintain copy of consent document	0	0	0
Develop and submit annual report	0	1	2
Total	Varies	Varies	Varies

^a Exhibit contains rounding error.

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent

0	0.5	\$49.18	\$0.00	\$0.00
0.1	0.1	\$3.94	\$0.00	\$0.00

0	0.5	\$49.18	\$0.00	\$0.00
0	0.5	\$49.18	\$0.00	\$7.31
0	0.1	\$9.84	\$0.00	\$0.00
0.1	0.1	\$3.94	\$0.00	\$0.00

1.65	5	\$394.55	\$0.00	\$0.00
0.5	0.5	\$19.72	\$0.00	\$0.00
2.5	10	\$836.23	\$0.00	\$0.00
1	1	\$39.44	\$0.00	\$0.00
0.5	0.5	\$19.72	\$0.00	\$6.04
0	5	\$491.75	\$0.00	\$0.14

1.5	1.72	\$80.80	\$0.00	\$0.00
0	2.18	\$305.23	\$0.00	\$0.00
0	1	\$100.06	\$0.00	\$20.44

0	6	\$624.28	\$0.00	\$4,656.00
0	6	\$624.28	\$0.00	\$4,656.00
0.5	0.5	\$19.72	\$0.00	\$0.00

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent

1	6	\$531.19	\$0.00	\$0.00
2	7	\$570.63	\$0.00	\$0.00
1	3	\$236.14	\$0.00	\$0.00

0.05	0.05	\$1.97	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00

0.05	0.05	\$1.97	\$0.00	\$0.00
------	------	--------	--------	--------

GENERATOR

0.05	0.05	\$1.97	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00

4	20	\$1,765.54	\$0.00	\$861.00
0	6	\$624.28	\$0.00	\$4,306.00
0	6	\$624.28	\$0.00	\$0.00
4	20	\$1,765.54	\$0.00	\$861.00
0	6	\$624.28	\$0.00	\$4,306.00
0	6	\$624.28	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00
0.1	0.1	\$3.94	\$0.00	\$0.74

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent
--------------------------	----------------------	---------------------------	------------------------------	--------------------------

0	0.5	\$49.18	\$0.00	\$0.00
0.1	0.1	\$3.94	\$0.00	\$0.00

0	0.5	\$49.18	\$0.00	\$0.00
0	0.5	\$49.18	\$0.00	\$7.31
0	0.1	\$9.84	\$0.00	\$0.00
0.1	0.1	\$3.94	\$0.00	\$0.00

1.65	5	\$394.55	\$0.00	\$0.00
0.5	0.5	\$19.72	\$0.00	\$0.00
2.5	10	\$836.23	\$0.00	\$0.00
1	1	\$39.44	\$0.00	\$0.00

0.5	0.5	\$19.72	\$0.00	\$6.04
0	5	\$491.75	\$0.00	\$0.00
1.5	1.72	\$80.80	\$0.00	\$0.00
0	2.18	\$305.23	\$0.00	\$0.00
0	1	\$100.06	\$0.00	\$20.44
0.08	0.1	\$5.46	\$0.00	\$0.00

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent

0	40	\$3,934.00	\$0.00	\$34.44
0	16	\$1,573.60	\$0.00	\$0.00
0	40	\$3,934.00	\$0.00	\$0.00
0	20	\$1,967.00	\$0.00	\$0.00
0	6	\$590.10	\$0.00	\$0.00

0	75	\$7,376.25	\$0.00	\$34.44
---	----	------------	--------	---------

0	75	\$7,376.25	\$0.00	\$34.44
---	----	------------	--------	---------

8	146	\$14,240.02	\$0.00	\$34.44
---	-----	-------------	--------	---------

0	20	\$1,967.00	\$0.00	\$0.00
---	----	------------	--------	--------

4	73	\$7,120.01	\$0.00	\$34.44
---	----	------------	--------	---------

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent

8	146	\$14,240.02	\$0.00	\$34.44
0	2	\$196.70	\$0.00	\$407.00

0	1.5	\$147.53	\$0.00	\$0.60
1.34	1.74	\$93.90	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00
0.16	0.16	\$6.31	\$0.00	\$0.48

0.05	0.05	\$1.97	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00

0	0.25	\$24.59	\$0.00	\$0.00
---	------	---------	--------	--------

0	0.25	\$24.59	\$0.00	\$0.00
0	0.25	\$24.59	\$0.00	\$0.00
0	0.25	\$24.59	\$0.00	\$0.00

0	1.5	\$147.53	\$0.00	\$0.60
1.34	1.74	\$93.90	\$0.00	\$0.00
0.05	0.05	\$1.97	\$0.00	\$0.00
0.16	0.16	\$6.31	\$0.00	\$0.48

0.05	0.05	\$1.97	\$0.00	\$0.48
------	------	--------	--------	--------

0	0.25	\$24.59	\$0.00	\$0.00
---	------	---------	--------	--------

Clerical @ \$39.44/hr	Hours/ Respondent	Labor Cost/ Respondent	Capital Costs/ Respondent	O&M Costs/ Respondent
0.1	1.1	\$102.29	\$0.00	\$0.00
0	0.25	\$24.59	\$0.00	\$0.00
0.1	1.6	\$151.47	\$0.00	\$0.00
0.4	1.4	\$114.13	\$0.00	\$0.00

0	1	\$98.35	\$0.00	\$0.00
0	0.5	\$49.18	\$0.00	\$0.00
0	3	\$312.14	\$0.00	\$0.00
0.5	0.5	\$19.72	\$0.00	\$0.00
0.5	3.5	\$331.86	\$0.00	\$0.00
Varies	Varies	\$79,908.10	\$0.00	\$20,330.74

Number of Respondents	Total Hours/ Year	Total Cost/ Year
26	13.00	\$1,278.55
26	2.60	\$102.54
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
134	670.00	\$52,869.50
134	67.00	\$2,642.48
134	1,340.00	\$112,054.15
134	134.00	\$5,284.96
134	67.00	\$3,451.84
13	65.00	\$6,394.57
2	3.44	\$161.59
2	4.36	\$610.46
2	2.00	\$241.00
33	198.00	\$174,249.24
0	0.00	\$0.00
33	16.50	\$650.76

Number of Respondents	Total Hours/ Year	Total Cost/ Year
12	72.00	\$6,374.28
12	84.00	\$6,847.56
12	36.00	\$2,833.68

160	8.00	\$315.52
160	8.00	\$315.52
160	8.00	\$315.52
1	0.15	\$4.67
1	0.15	\$4.67
21	140.00	\$15,611.16
21	42.00	\$28,660.24
22	42.00	\$3,932.04
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
64	1.05	\$32.70
5	0.50	\$17.97

Number of Respondents	Total Hours/ Year	Total Cost/ Year
16	0.50	\$41.87
16	0.10	\$3.11
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
177	305.00	\$20,245.84
177	30.50	\$949.80
177	610.00	\$43,058.35
177	61.00	\$1,899.59

177	30.50	\$1,246.87
18	30.00	\$2,512.09
3	1.72	\$65.13
3	2.18	\$242.19
3	1.00	\$98.05
193	6.20	\$295.06

Number of Respondents	Total Hours/ Year	Total Cost/ Year
4	160.00	\$13,510.85
4	64.00	\$5,359.13
4	160.00	\$13,397.81
4	80.00	\$6,698.91
4	24.00	\$2,009.67
1	75.00	\$6,308.49
1	150.00	\$12,616.97
7	1,022.00	\$84,942.69
7	140.00	\$11,723.09
0	0.00	\$0.00

Number of Respondents	Total Hours/ Year	Total Cost/ Year

0.04	5.84	\$485.39
0.04	0.08	\$20.08
0	0.45	\$37.86
0	0.52	\$23.46
0	0.02	\$0.47
0	0.08	\$2.73
3.5	0.18	\$5.45
3.5	0.18	\$5.45
1	0.25	\$20.93
0	0.00	\$0.00
0	0.00	\$0.00
0	0.00	\$0.00
0	0.45	\$37.86
0	0.52	\$23.46
0	0.02	\$0.47
0	0.08	\$2.73
3.5	0.18	\$7.13
1	0.25	\$20.93

Number of Respondents	Total Hours/ Year	Total Cost/ Year
1,433	2,750.00	\$217,126.05
4,300	1,875.00	\$157,005.63
1,433	4,000.00	\$321,796.48
4,300	10,500.00	\$721,445.01

4,300	7,500.00	\$628,022.54
4,300	3,750.00	\$314,011.27
9	108.00	\$10,110.95
9	18.00	\$560.53
9	0.00	\$0.00
Varies	36,488.53	\$3,023,255.59

EXHIBIT 2
ESTIMATED ANNUAL STATE AGENCY HOUR AND COST BURDEN

	Hours per Agency Activity		
	Legal @ \$125.97/hr	Managerial @ \$124.90/hr	Technical @ \$96.56/hr
OFF-SITE TRANSFER BASED EXCLUSION FOR HAZARDOUS SECONDARY MATERIAL			
Emergency Preparedness and Response			
Emergency Procedures			
Review submitted release report information	0	0	0.5
Enter information into database tracking all releases	0	0	0.5
Transmit information to respective response authorities	0	0	0.25
Financial Assurance (40 CFR part 261 subpart H) under the Transfer Based Exclusion			
Review financial estimates and instruments	4	1	16
HAZARDOUS SECONDARY MATERIAL GENERATED AND RECLAIMED UNDER THE CONTROL OF THE C			
Emergency Procedures			
Review submitted release report information	0	0	0.5
Enter information into database tracking all releases	0	0	0.5
Transmit information to respective response authorities	0	0	0.25
SOLID WASTE VARIANCES AND NON-WASTE DETERMINATIONS			
Variance from Classification as a Solid Waste (260.31(c) and 260.33(a))			
Review the variance demonstration	0	2.2	18.16
Request additional information if necessary	0	0	0.55
Deliberate and issue draft determination	3.85	1.65	25.31
Publicize draft determination	0	0	1.65
Hold hearing, if required	0	0.55	22.01
Re-Application for a Variance			
Receive, Review and File Re-Application in the Event of a Change	8	8	125
Receive, Review and File Re-Application for a Variance Every 10 Years	0	0	0.08
Application for Non-Waste Determination			
Evaluate and approve/deny application	8	8	125
Re-Application for Non-Waste Determination			
Receive, Review and File Re-Application for Non-Waste Determination Every 10 Years	0	0	0.08
REMANUFACTURING EXCLUSION			
Rulemaking Petition Process			
Review the petition	8	8	125
Request additional information if necessary	0	0	0.55
Deliberate and issue draft determination	3.85	1.65	25.31
Publicize draft determination	0	0	1.65
Hold hearing, if required	0	0.55	22.01
Review comments and make final determination	2.2	1.65	23.11
EXPORT REQUIREMENTS			
Review export notification	0	1	1
Review annual report	0	1	1
Total	Varies	Varies	Varies

Clerical @ \$44.22/hr	Hours/ Activity	Labor Cost/ Activity	Capital Costs/ Activity	O&M Costs/ Activity	Number of Agency Activities
0	0.5	\$48.28	\$0.00	\$0.00	2
0.5	1	\$70.39	\$0.00	\$0.00	2
0.25	0.5	\$35.20	\$0.00	\$0.00	2
0	21	\$2,173.74	\$0.00	\$0.00	12
GENERATOR					
0	0.5	\$48.28	\$0.00	\$0.00	3
0.5	1	\$70.39	\$0.00	\$0.00	3
0.25	0.5	\$35.20	\$0.00	\$0.00	3
0	20.36	\$2,028.31	\$0.00	\$0.00	4
1.65	2.2	\$126.07	\$0.00	\$0.00	4
2.2	33.01	\$3,232.29	\$0.00	\$0.00	4
4.4	6.05	\$353.89	\$0.00	\$0.00	4
1.65	24.21	\$2,266.94	\$0.00	\$0.00	4
16	157	\$14,784.48	\$0.00	\$0.00	1
0.05	0.13	\$9.94	\$0.00	\$0.00	1
16	157	\$14,784.48	\$0.00	\$0.00	7
0.05	0.13	\$9.94	\$0.00	\$0.00	0
16	157	\$14,784.48	\$0.00	\$0.00	0.04
1.65	2.2	\$126.07	\$0.00	\$0.00	0.04
2.2	33.01	\$3,232.29	\$0.00	\$0.00	0.04
4.4	6.05	\$353.89	\$0.00	\$0.00	0.04
1.65	24.21	\$2,266.94	\$0.00	\$0.00	0.04
2.2	29.16	\$2,812.00	\$0.00	\$0.00	0.04
0	2	\$221.46	\$0.00	\$0.00	9
0	2	\$221.46	\$0.00	\$0.00	9
Varies	Varies	\$64,096.41	\$0.00	\$0.00	74.24

Total Hours/ Year	Total Cost/ Year
1.00	\$96.56
2.00	\$140.78
1.00	\$70.40
252.00	\$26,084.88
1.50	\$144.84
3.00	\$211.17
1.50	\$105.60
81.44	\$8,113.24
8.80	\$504.28
132.04	\$12,929.16
24.20	\$1,415.56
96.84	\$9,067.76
157.00	\$14,784.48
0.13	\$9.94
1,099.00	\$103,491.36
0.00	\$0.00
6.28	\$591.38
0.09	\$5.04
1.32	\$129.29
0.24	\$14.16
0.97	\$90.68
1.17	\$112.48
18.00	\$1,993.14
18.00	\$1,993.14
1,907.52	\$182,099.32