

U.S. Environmental Protection Agency

Information Collection Request

Title: Standardized Permit for RCRA Hazardous Waste Management Facilities

OMB Control Number: 2050-0182

EPA ICR Number: 1935.08

Abstract: Under the authority of sections 3004, 3005, 3008 and 3010 of the Resource Conservation and Recovery Act (RCRA), as amended, the U.S. Environmental Protection Agency (EPA) revised the RCRA hazardous waste permitting program to allow a “standardized permit”. The standardized permit is available to facilities that generate hazardous waste and routinely manage the waste on-site in non-thermal units such as tanks, containers, and containment buildings. In addition, the standardized permit is available to facilities that receive hazardous waste generated off-site by a generator under the same ownership as the receiving facility and then store or non-thermally treat the hazardous waste in containers, tanks, or containment buildings. The RCRA standardized permit consists of two components: a uniform portion that is included in all cases, and a supplemental portion that the director of a regulatory agency would include at his or her discretion. The uniform portion would consist of terms and conditions, relevant to the unit(s) at the permitted facility, and would be established on a national basis.

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.

CFR citation (40 CFR Part)	Brief Description of Requirements
124.202	Specifies procedures that must be followed to apply for a standardized permit.
124.203	Specifies procedures to switch from RCRA permit to a standardized permit.
124.204	Specifies what a regulatory agency must do to prepare a draft standardized permit.
124.212	Specifies what procedures to follow to make routine changes to a standardized permit.
124.213	Specifies what procedures to follow to make routine changes without prior approval.
270.10	Requires owners and operators wishing to reapply for a standardized permit to submit a notice of intent under at least 180 days before the expiration date of the effective permit.
270.275	Requires that applicants for a standardized permit submit to the permitting agency information that will be used as the basis of the standardized permit application.

270.280	Requires owners and operators wishing to obtain a standardized permit to provide a signed certification of the facility's compliance with part 267.
270.290	Requires facilities that store or treat hazardous waste under a standardized permit to keep at their facilities general types of information.
270.300	Requires facilities that store or treat hazardous waste under a standardized permit to keep at their facilities information specific to containers.
270.305	Requires facilities that store or treat hazardous waste under a standardized permit to keep at their facilities information specific to tanks.
270.310	Requires facilities that store or treat hazardous waste under a standardized permit to keep at their facilities information specific to equipment subject to part 264, subpart BB.
270.315	Requires facilities that store or treat hazardous waste under a standardized permit to keep at their facilities information specific to equipment subject to part 264, subpart CC.

2. 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.

APPLYING FOR A STANDARDIZED PERMIT

EPA uses information submitted by facilities to evaluate exposure potential and minimize any risks to human health from hazardous waste management facilities. If EPA determines that a facility poses a substantial risk to human health, EPA may request that the Agency for Toxic Substances and Disease Registry conduct a health assessment.

EPA uses information regarding specific units at facilities to evaluate the adequacy of each unit to manage hazardous wastes. Additional information is required because each of the different types of hazardous waste management units present different risks to the environment and consequently requires different standards. EPA reviews the submittals of each type of hazardous waste management unit to evaluate whether it is designed, constructed, and operated in a manner protective of human health and the environment. EPA uses the information required by part 264, subparts BB and CC to ensure compliance with air emission standards.

MAINTAINING A STANDARDIZED PERMIT

EPA uses permit information to evaluate the initial permit application and any subsequent request for modification. The public may also use draft EPA permit and permit modification determinations, which incorporate data submitted by facilities, to assess hazardous waste management facilities being developed in their communities.

3. 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.

The information collected, as described above, can be kept in a electronic format files and emailed as necessary.

4. 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.

In finalizing the standardized permit rule, EPA streamlined the permit process by allowing certain types of facilities to obtain and modify permits more easily while maintaining the protectiveness currently existing in the individual RCRA permit process. Thus, facility owners and operators are relieved of certain RCRA record keeping and reporting requirements that currently exist under the RCRA permitting process.

5. 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.

The standardized permit provides regulatory relief from parts of RCRA hazardous waste permitting program for facilities with tanks, containers, and containment buildings that apply and obtain a standardized permit. Thus, small facilities, among others, would see relief. In addition, the final regulations would allow these facilities to maintain most information in facility records rather than in submittals to EPA, thus reducing time and costs for providing information. Since small facilities conduct operations that are equally as hazardous to the environment as those conducted by larger facilities, EPA determined that small businesses should be required to comply with the same regulations as large businesses. As a result of this interpretation, no specific requirements are outlined for smaller facilities.

6. 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.

The standardized permit application procedures are less cumbersome than the procedures for an individual permit. Owners and operators do not have to submit the amount of information needed to support an individual permit application, although they need to keep the information at their facility. In addition, the procedures for modifying standardized permits would allow owners and operators to make certain types of routine changes without prior approval, provided that they inform both the regulatory agency and the public of the changes. EPA believes the collection frequencies specified in this ICR are necessary to ensure protection of human health and the environment.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines at 5 CFR 1320.5(d)(2).

The proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

8. 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 January 9, 2026 (91 FR 997) and provided a 60-day comment period for this ICR. One comment was received. The comment, which is attached to this supporting statement, felt that the burden of 218 hours for one facility was extreme. The commenter requested the ICR be discontinued. This renewal revises the burden estimate from 218 to 21.8, or 22 hours, in acknowledgement that the standardized permit needs to be renewed only once every 10 years, and the previous burden estimate reflected that one-time event. The facility that has a standardized permit renewed it in 2021, so it is good until 2031. Although as the commenter pointed out the standardized permit is voluntary, the need for a RCRA permit is mandatory. If the facility did not have a standardized permit, they would need to apply for a RCRA Part A permit, which would be more burdensome. The commenter further suggested the standardized permit program be discontinued.

The commenter is encouraged to petition the Agency for a regulatory change. Section 7004 of RCRA states that any person may petition EPA for the promulgation, amendment, or repeal of any regulation under RCRA. EPA promulgated regulations pursuant to §7004 that outline the procedures for filing this type of petition. According to §260.20, each petition must include:

- The petitioner's name and address
- A statement of the petitioner's interest in the proposed action
- A description of the proposed action, and
- A statement of the need and justification for the proposed action (including any supporting tests, studies, or other information).

Upon submission, EPA reviews the petition and publishes a tentative decision in the *Federal Register* to grant or deny it. After a public comment period, EPA evaluates all timely comments and publishes the final decision in the *Federal Register*.

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 the one facility that has a standardized permit and they found the burden estimates to be accurate.

9. 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.

10. 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.

Section 3007(b) of RCRA and 40 CFR part 2, subpart B, which define EPA's general policy on public disclosure of information, contain provisions for confidentiality. EPA does not anticipate requesting any confidential information.

11. 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 the information collection requirements.

12. 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.*
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12a. Respondents/NAICS Codes

The original ICR for the standardized permit rule included estimate for the number of eligible facilities, and for facilities expected to apply for the standardized permit. Since the rule was promulgated in 2005, 22 states have received authorization for the rule but only one facility has been issued a standardized permit.

The applicable NAICS codes are:

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

APPLYING FOR A STANDARDIZED PERMIT

Sections 124.202, 270.275, 270.280, and 270.285 require owners and operators wishing to obtain a standardized permit to provide the following data items:

- A written notice to the Director that the owner or operator intends to operate under a standardized permit;

- A meeting summary and other materials required by section 124.31;
- Documentation of compliance with the location standards of sections 267.18 and 270.14(b)(11), including:
 - An identification of the political jurisdiction in which the facility is proposed to be located;
 - If the facility is proposed to be located in an area listed in Appendix VI of part 264, a demonstration of compliance with the seismic standard as defined under section 264.18(a). This demonstration may be made using either published geologic data or data obtained from field investigations carried out by the applicant;
 - An identification of whether the facility is located within a 100-year floodplain
- Information that allows the Director to carry out his obligations under other Federal laws required in section 270.3;
- Solid waste management unit information required by section 270.14(d), including:
 - The location of each unit on the topographic map required under section 270.14(b)(19);
 - Designation of the type of each unit;
 - General dimensions and structural description of each unit;
 - Dates when each unit was operated;
 - Specification of all wastes that have been managed at each unit, to the extent available;
 - All available information pertaining to any release of hazardous wastes or hazardous constituents from each unit (section 270.14(d)(2));
 - Results of sampling and analysis, where the Director ascertains that a RCRA Facility Assessment is necessary.
- A signed certification of the facility's compliance with part 267, as specified at section 270.280; and
- Results of a compliance audit, as required by section 270.280.
- A waste analysis plan, if you manage waste generated off-site.
- Documentation showing that the same person owns both the waste generator and the receiving facility, if you manage waste generated off-site.

MAINTAINING A STANDARDIZED PERMIT

Sections 124.212 and 270.320 require owners and operators seeking to make routine changes (Class 1 modifications under 40 CFR 270.42 Appendix I that do not require prior approval from the Director) to their standardized permits to provide the following data items:

- The revised information pursuant to section 270.267(b)(1); and
- A notice of changes to the facility mailing list and to state and local governments in accordance with the procedures in sections 124.10(c)(1)(ix) and (x).

Section 124.213 and 270.320 require owners and operators seeking to make routine changes to their standardized permits to provide the following data items:

- The revised information pursuant to section 270.267(b)(1) requesting approval; and
- A notice of changes to the facility mailing list and to state and local governments in accordance with the procedures in sections 124.10(c)(1)(ix) and (x).

Sections 124.214 and 270.320 require owners and operators seeking to make significant changes (based on the criteria specified in section 270.320(b)(1)-(3)) to their standardized permits to provide the following data items:

- A public meeting (with prior notice);
- A modification request to the Director that:
 - Describes the exact change(s) desired, and whether they are changes to information provided under section 270.275 or to terms and conditions in the supplemental portion of the standardized permit;
 - Explains why the modification is needed; and
 - Includes a summary of the public meeting described above, along with the list of attendees and their addresses and copies of any written comments or materials submitted at the meeting.

12c. Respondent Activities

APPLYING FOR A STANDARDIZED PERMIT

In order to obtain a standardized permit, owners and operators will have to perform the following activities:

- Read the regulations;
- Prepare a written notice of intent to operate under a standardized permit;
- Obtain the meeting summary and other materials required by section 124.31;
- Develop documentation of compliance with location standards;
- Prepare information that allows the Director to carry out his obligations under other Federal laws;
- Prepare the solid waste management unit information;
- Prepare a closure plan;
- Prepare a closure cost estimate.
- If you manage waste generated off-site, prepare a waste analysis plan.
- If you manage waste generated off-site, prepare documentation showing that the same person owns both the waste generator and the receiving facility.
- Submit the above information to the Director.

MAINTAINING A STANDARDIZED PERMIT

- Read the regulations;
- Prepare and submit the revised information to the Director; and
- Submit the revised information to the facility mailing list and local governments.

12d. Respondent Burden Hours and Labor Costs

EPA estimated respondent burden associated with all of the requirements covered in this ICR in Exhibits 1 and 2 attached to this supporting statement. The exhibits estimate the number of hours required to conduct each individual information collection activity and the cost associated with that activity and are summarized in Table 1 below.

TABLE 1 – TOTAL ESTIMATED RESPONDENT BURDEN AND COST

Exhibit	Title	Hour Burden	Labor Cost	O&M Cost	Total Cost
Exhibit 1	Applying for a Standardized Permit	82	\$6,739	\$529	\$7,398
Exhibit 2	Maintaining a Standardized Permit	136	\$11,761	\$0	\$11,761
Total		218	\$18,500	\$529	\$19,159

The labor wage rates used to estimate costs to respondents were calculated as shown in the following table. The 2026 average wage rates from are the average wage rates are reported in the Bureau of Labor Statistics, 2024 National Occupational Employment and Wage Estimate, released May 2024, and updated to 2026 levels.

Labor Category	Non-loaded 2022 hourly rate	Fringe benefits loading multiplier	Overhead loading multiplier	Loaded Hourly rate
1. Legal	\$69.05	1.43	1.336	\$131.92
2. Managerial	\$58.30	1.43	1.336	\$111.39
3. Technical	\$44.93	1.43	1.336	\$85.83
4. Clerical	\$17.52	1.43	1.336	\$33.47

As shown in Table 1, EPA estimates that the respondent burden to be approximately 218 hours; which when annualized over 10 years, as a standardized permit is good for 10 years, the average annual burden is 22 hours. Average annual respondent labor costs are approximately \$185.

13. 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.

EPA estimates that respondents may incur operations and maintenance costs associated with the information collection requirements. EPA estimates that sending a notification to EPA under sections 124.202, 270.275, 270.280, and 270.285 would cost about \$8.90 for the mailing expense (e.g., for certified mail with return receipt). Respondents would also be expected to obtain a topographical map (\$20) and incur roughly \$500 in expenses to prepare and maintain a detailed description of how new tank systems will be installed in compliance with Section 267.194

Capital/operation & maintenance costs are estimated at \$529 which when annualized over 10 years is \$53 per year.

14. 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.

14a. Agency Activities

EPA estimates Agency burden hours and costs associated with all the requirements covered in this ICR in Exhibit 3 and 4 attached to this supporting statement and summarized in Table 2 below.

TABLE 2 - TOTAL ESTIMATED AGENCY BURDEN AND COST

Exhibit	Title	Burden	Labor Cost	Capital/Startup Cost	O&M Cost	Total Cost
Exhibit 3	Applying for a Standardized Permit	0	\$0	\$0	\$0	\$0
Exhibit 4	Maintaining a Standardized Permit	0	\$15,882	\$0	\$0	\$15,882
Total		427	\$15,882	\$0	\$0	\$15,882

EPA estimates an average hourly Agency labor cost of \$96.90 for Regional legal staff, \$69.71 for Regional managerial staff, \$48.91 for Regional technical staff, and \$29.74 for Regional clerical staff. EPA used the 2026 Federal Pay Schedule salary figures and multiplied the rates by the standard government overhead factor of 1.6 to derive hourly rates.

14b. Agency Labor Cost

EPA estimates that the agency burden is approximately 427 hours; which when annualized over 10 years, as a standardized permit is good for ten years, the bottom-line burden is 43 hours.

14c. Agency Non-Labor Costs

There are no Agency non-labor costs associated with this ICR.

14d. Total Agency Costs

Distributed across the 10-year lifetime of a permit the annualized average Agency costs is approximately \$1,588.

15) REASONS FOR CHANGE IN BURDEN

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

There is a decrease of 196 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This decrease is due to adjustments to the estimates.

16) 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.

Results from this ICR are not published formally.

17) 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.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

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

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.