SUPPORTING STATEMENT FOR

EPA INFORMATION COLLECTION REQUEST NUMBER 0820.06

HAZARDOUS WASTE GENERATOR STANDARDS

JULY 15, 1997

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE AND NUMBER OF THE INFORMATION COLLECTION

This information collection request (ICR) is entitled "Hazardous Waste Generator Standards," ICR number 0820.06.

1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

In the Resource Conservation and Recovery Act (RCRA), as amended, Congress directed the U.S. Environmental Protection Agency (EPA) to implement a comprehensive program for the safe management of hazardous waste. The core of the national waste management program is the regulation of hazardous waste from generation to transport to treatment and eventual disposal, or from "cradle to grave." Section 3001(d) requires EPA to develop standards for small quantity generators. Section 3002 of RCRA states that EPA shall establish requirements for hazardous waste generators regarding recordkeeping practices, the use of a manifest system, and the submittal of a biennial report. (This ICR does not cover any requirements for manifesting of either domestic or international shipments of hazardous waste. Manifesting requirements are addressed in ICR Number 801. Biennial reporting requirements are addressed in ICR Number 976.) Section 3002 also requires EPA to establish standards on appropriate use of containers by generators. Section 3010 sets forth requirements for hazardous waste generators for notification of hazardous waste activity. (Notification requirements are addressed in ICR Number 261.)

Finally, Section 3017 of RCRA specifies requirements for individuals exporting hazardous waste from the United States, including a notification of the intent to export, and an annual report summarizing the types, quantities, frequency, and ultimate destination of all exported hazardous waste.

In 1980, EPA promulgated the principal elements of the generator requirements in 40 CFR Part 262. These regulations have been amended on several occasions. This ICR will discuss four categories of informational requirements in Part 262: pre-transport requirements for both large (LQG) and small (SQG) quantity generators (including the generator pre-transport requirements referenced in 40 CFR Part 265), air emission standards requirements for LQGs (referenced in 40 CFR Part 265, Subparts I and J), recordkeeping and reporting requirements for LQGs and SQGs, and export requirements for LQGs (i.e., notification of intent to export and annual reporting). A brief summary of the information collection requirements associated with relevant generator regulations is provided below.

LARGE QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

Large quantity generators (LQGs) generate 1000 kg or more of hazardous waste per month. LQGs may accumulate hazardous waste on-site for 90 days or less in tanks, containers, drip pads, or containment buildings without a permit if they comply with requirements specified in §262.34, which cross-reference certain Part 265 requirements. Those Part 265 requirements (as applicable only to generators) are included here. There are six categories of pre-transport informational requirements specific to LQGs: personnel training, contingency planning and emergency procedures, tank systems, drip pads, containment buildings, and requests for extensions of the accumulation period (there are no informational requirements associated with container storage).

(1) Personnel Training

Under §262.34(a)(4), the personnel training information requirements in §265.16(d) and (e) are applicable to LQGs. This regulation requires LQGs to document certain information for facility personnel dealing with hazardous wastes. Required information includes a written job description and necessary qualifications for each position, and the training given to the individual filling that position.

(2) Contingency Planning and Emergency Procedures

Under §262.34(a)(4), the preparedness and prevention and contingency plan and emergency procedure regulations promulgated in Subparts C and D of Part 265, specifically §§265.37(b), 265.51 through 265.54, and 265.56, are applicable to LQGs. These require LQGs to record whether State or local authorities declined to enter into an arrangement to become more familiar with the generator's facility and its wastes, prepare and maintain contingency plans, and to comply with emergency reporting requirements. The contingency plan describes the actions facility personnel will take should a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water occur. Local emergency response teams use the information required in the contingency plan to minimize unanticipated damage from the unintended release of hazardous waste.

Other emergency reporting requirements under Part 265 Subpart D include notifying the Regional Administrator that a facility is in compliance with specific regulations before operations resume in any area affected by an emergency situation (§265.56(i)), and submitting a report to the Regional Administrator containing details of any emergency situation that requires implementation of the contingency plan (§265.56(j)).

(3) Tank Systems

Section 262.34(a)(1) requires LQGs that use tank systems for accumulating hazardous waste for 90 days or less to comply with Part 265 Subpart J. Depending on how the tank owner desires to comply with the regulations, he or she may need to perform one or more of the following:

- A no-free-liquids demonstration (§265.190(a));
- Existing tank system assessments (§265.191);
- An equivalent containment exemption (§265.193(d));
- A variance from secondary containment requirements (§265.193(g) and (h);
- Annual leak tests and inspection documentation (§265.193(i):§265.195(c)); or
- An exemption from the 24-hour leak detection requirement (§265.193(e)(3)(iii)).

In addition, if any LQG has a new tank or new components he or she must perform new tank system assessments and certifications (§265.192(g)). If an LQG storing hazardous waste in tanks has a release and seeks an exemption from the 24-hour waste removal requirement (§265.196)(b) he or she may submit a demonstration that such removal is not possible. Any LQG that releases hazardous waste being stored in a tank to the environment must report the release and file a report with the Regional Administrator. Where any LQG repairs a tank, he or she must obtain a major repair certification and submit that certification to the Regional Administrator (§265.196(f)).

(4) Drip Pads

Hazardous waste generators that accumulate hazardous waste on a drip pad may have to prepare, collect and/or submit the following information. If they only have infrequent and incidental drippage they may be exempt from the drip pad requirements provided they submit a contingency plan that describes their clean-up response to such drippage (§265.440(c)(1)). Generators that have an existing drip pad must maintain on file an assessment of pad integrity (§265.441(a)) as well as submit a plan for upgrading the pad to regulatory standards to the Regional Administrator (§265.441(b)). These generators also must prepare and submit drawings and a certification of repairs or modifications to Regional Administrator (§265.441(c)).

All generators using drip pads must maintain on file an assessment of the drip pad (§265.443(a)(4)(ii)), maintain records of releases from the pad in the operating log (§265.443(m)(1)(i)),

and notify the Regional Administrator and provide written notice of any release of hazardous waste from the pad (§265.443(m)(1)(iv)). Should repairs be necessary, such hazardous waste generators must notify the Regional Administrator of the completion of repairs and provide certification of the repairs (§265.443(m)(3)). Generators using drip pads must document operating and waste handling practices in an operating log (§265.443(n)) and place a certification of the adequacy of the liner in that log (§265.444(a)). Finally, these generators must maintain a description of 90-day waste removal practices (§262.34(a)(1)(iii)(A)) and document each waste removal (§262.34(a)(1)(iii)(B)).

(5) Containment Buildings

Hazardous waste generators that accumulate hazardous waste in a containment building may have to prepare, collect and/or submit specific information. Such LQG generators must place a certification that the containment building meets design requirements in the operating record (§265.1101(c) and §262.34(a)(1)(iv))), enter a record of any release of hazardous waste (§265.1101(c)(3)(i)(A)), and notify the Regional Administrator of the release within 7 days and provide written notice within 14 days (§265.1101(c)(3)(i)(D)). Generators repairing containment buildings must notify the Regional Administrator of completion of the repairs (§265.1101(c)(3)(iii)). Those accumulating hazardous waste in containment buildings must also place monitoring data in the operating records at least every 7 days (§265.1101(c)(4)), place a description of procedures to maintain the integrity of areas lacking secondary containment in the record (§265.1101(d)), and document that the unit is emptied at least once every 90 days (§262.34(a)(1)(iv)(B)). Finally, such facilities must prepare written procedures for waste stored less than 90 days; document waste generation and management practices; and document that required procedures are satisfied (§262.34(a)(1)(iv)(A)).

(6) Requests for Extensions of the Accumulation Period

Section 262.34(b) allows LQGs to request from the Regional Administrator an extension (up to 30 days) of the accumulation period limit.

LARGE QUANTITY GENERATOR AIR EMISSION STANDARDS REQUIREMENTS

Those LQGs that accumulate hazardous wastes on-site for 90 days or less in tanks or containers without a permit must comply with requirements specified in §262.34, which cross-reference 40 CFR Part 265, Subparts I and J. These Part 265 requirements establish two new categories of informational requirements for such generators: air emission standards for process vents and air emission standards for equipment leaks. (See 61 FR 59950, November 25, 1996.)

(1) Process Vents

Sections 265.178 and 265.202 require generators accumulating hazardous wastes on-site for 90 days or less in containers or tanks, respectively, without permits to comply with the requirements at 40 CFR Part 265, Subpart AA. In Subpart AA, EPA promulgated regulations governing emissions to air from process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10-ppmw if the unit: is subject to the permitting requirements of 40 CFR Part 270; is not exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a hazardous waste recycling unit that is not a 90-day tank or container) and is located at a hazardous waste management facility otherwise subject to the permitting requirements of 40 CFR part 270; or is exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a 90-day tank or container). To comply with these regulations respondents must submit several information collections, including some or all of the following:

- Documentation describing the operation of and identifying process parameters that indicate proper operation and maintenance of control devices other than those specified under this Part;

- Documentation of waste determination, if the waste determination was based on knowledge of the waste rather than testing (§265.1034(d)(2)); and

- An operating record containing documentation specified in §265.1035(b)-(f) (§265.1035(b)).

(2) Equipment Leaks

Sections 265.178 and 265.202 require generators accumulating hazardous wastes on-site for 90 days or less in containers or tanks, respectively, without permits must comply with the requirements at 40 CFR Part 265, Subpart BB. In Subpart BB, EPA promulgated regulations governing emissions to air from equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight if the unit: is subject to the permitting requirements of 40 CFR Part 270; is not exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a hazardous waste recycling unit that is not a 90-day tank or container) and is located at a hazardous waste management facility otherwise subject to the permitting requirements of 40 CFR part 270; or is exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a 90-day tank or container). To comply with these regulations respondents must submit several information collections, including some or all of the following:

- Notification that an owner/operator has decided to implement the alternative valves in gas/vapor service or in light liquid service standard specified in § 265.1061(a) (§265.1061(b)(1));

- Notification that an owner/operator no longer implementing the alternative standard specified in § 265.1061(a) will follow the work practice standards in 265.1057(a) through (e) (§265.1061(d));

- Notification that an owner/operator has decided to implement the alternative standard for valves specified in either § 265.1062(b)(2) or (b)(3) (§265.1062(a)(2));

- Documentation of the determination that each piece of equipment does or does not contain or contact hazardous waste with organic concentration that equals or exceeds 10 percent by weight, if this determination was based on knowledge rather than testing 265.1062(d)(3));

- Unit operating record containing documentation specified in §265.1064(b) - (m) 265.1064(b)).

SMALL QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

Generators who generate more than 100 and less than 1000 kg of non-acute hazardous waste per calendar month and less than 1 kg of acute hazardous waste per month are small quantity generators (SQGs). SQGs may accumulate up to 6000 kg of their waste for 180 days (or 270 days if the generator must transport the waste more than 200 miles to a hazardous waste management facility) without a permit if they comply with the requirements in Part 262. Applicable information requirements include compliance with §262.34(d)(4), which references §265.37(b) if State or local authorities decline to enter into arrangements to become familiar with the site, and §262.34(d)(5)(ii), which requires posting of emergency information near the phone. Section 262.34(d)(5) requires SQGs to notify and provide information to the National Response Center immediately in the event of a fire, explosion, or other release which could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water. Finally, §262.34(f) allows SQGs to request from the Regional Administrator an extension (up to 30 days) of the accumulation period limit.

RECORDKEEPING AND REPORTING REQUIREMENTS

All generators (both LQGs and SQGs) must comply with the recordkeeping and reporting requirements detailed in §§262.40 and .43. Section 262.40(c) requires generators to keep records of any test results, waste analyses, or other determinations for at least three years. The period of recordkeeping is automatically extended during enforcement actions, and by the request of the Administrator. Section 262.43 requires generators to furnish additional reports regarding the volume and nature of their hazardous wastes, as deemed necessary by the Administrator.

EXPORT REQUIREMENTS

All generators (both LQGs and SQGs) must also comply with the export requirements detailed in §§262.52 - .57. These are requirements for "primary exporters," individuals originating a manifest for the export of a shipment of hazardous waste, and intermediaries arranging the shipment (e.g., brokers). Persons meeting the definition of "primary exporter" are required to notify EPA of their intention to export hazardous waste, renotify EPA if the conditions of the original notification are altered, file an Annual report with the Administrator summarizing the types, quantities, frequencies, and ultimate destination of all hazardous wastes exported during the previous year, and keep copies of relevant documents for a period of three years. EPA may also request that primary exporters provide additional information, as requested by the receiving country.

This ICR is a comprehensive presentation of the generator information requirements and covers Fiscal Years 1998 through 2000.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED AND AUTHORITY FOR THE COLLECTION

Under §3002 of RCRA, EPA is required to promulgate regulations applicable to generators of hazardous waste as necessary to protect human health and the environment. Such standards must include, but are not limited to, requirements addressing recordkeeping, labeling, use of appropriate containers, and furnishing information on the chemical composition of the waste to persons transporting, treating, storing, or disposing of the waste.

LARGE QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Personnel Training

Section 262.34(a)(4) requires LQGs to maintain copies of personnel training documents and records (under §265.16(d) and (e)) at their facilities. Both EPA and LQGs need information in personnel training records to determine whether employees have acquired the necessary expertise to perform their jobs. EPA also needs this information to review personnel records to determine whether employees are receiving a level of training that is commensurate with their duties and responsibilities as well as their ability to respond to any emergency situations at the facility. Requiring generators to maintain personnel training documents decreases the likelihood that employees are unqualified to handle hazardous waste or respond to emergencies. The personnel recordkeeping requirement contributes to EPA's goal of minimizing the potential for employee-related mistakes that may threaten human health and the environment.

(2) Contingency Planning and Emergency Procedures

Under §262.34(a)(4), LQGs must comply with Subparts C and D of Part 265, which detail requirements for contingency plans for effective action to minimize unanticipated damage from the accumulation of any hazardous waste. These regulations require LQGs to record whether State or local authorities declined to enter into arrangement to become more familiar with the generator's facility and its wastes, prepare and maintain contingency plans, and prepare emergency reports whenever imminent or actual emergency situations occur. EPA reviews the contingency plans and emergency reports to determine whether LQGs have developed adequate procedures to respond to unplanned sudden or non-sudden releases of hazardous waste or hazardous constituents to air, soil, or surface water. Requiring LQGs to develop and maintain contingency plans and prepare emergency response reports contributes to EPA's goal of minimizing unanticipated damage from the storage of hazardous waste at generator sites.

(3) Tank Systems

Under §262.34(a)(1), EPA requires LQGs that accumulate hazardous waste in tank systems to comply with Subpart J of Part 265. Requirements include §§265.190(a); 265.191; 265.192(g); 265.193(d), (g), (h), and (i); 265.195(c); and 265.196(b), (d) and (f). These requirements ensure that LQGs only operate tank systems that are fully protective of human health and the environment and that if releases to the environment occur action is taken immediately. This requirement also contributes to EPA's goal of preventing contamination of the environment from hazardous waste accumulation practices.

(4) Drip Pads

Under §262.34(a)(1)(iii), EPA requires LQGs that accumulate hazardous waste on drip pads to comply with Subpart W of Part 265 as well as to document waste removal. These requirements ensure that drip pads are designed and used in a manner that is protective of human health and the environment. The information collection requirements document the proper design and use of this type of unit.

(5) Containment Buildings

Under §262.34(a)(1)(iv), EPA requires LQGs that accumulate hazardous waste in containment buildings to comply with Subpart DD of Part 265 as well as to document the existence of storage procedures that ensure the waste remains in the unit for no more than 90 days, that waste generation and management practices are consistent with 90-day storage, that these procedures are complied with, or that the unit is emptied at least every 90 days. These requirements ensure that containment buildings are designed and used in a manner that is protective of human health and the environment. The information collection requirements document the proper design and use of this type of unit.

(6) Requests for Extensions of the Accumulation Period

EPA promulgated regulations in §262.34(b) allowing LQGs to request from the Regional Administrator extensions (up to 30 days) of the accumulation period limit due to unforeseen, temporary, and uncontrollable circumstances. EPA needs information about the extension to evaluate the cause of the generators' requests for extensions. These requirements ensure that only generators genuinely in need of an extension are allowed to accumulate wastes longer than 90 days, and contribute to EPA's goal of preventing contamination of the environment.

LARGE QUANTITY GENERATOR AIR EMISSION STANDARDS REQUIREMENTS

(1) Process Vents

In 40 CFR Part 265, Subpart AA, EPA promulgated regulations governing emissions to air from process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10-ppmw if the unit: is subject to the permitting requirements of 40 CFR Part 270; is not exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a hazardous waste recycling unit that is not a 90-day tank or container) and is located at a hazardous waste management facility otherwise subject to the permitting requirements of 40 CFR part 270; or is exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a 90-day tank or container). EPA needs information from generator facilities concerning hazardous waste releases to air from process vents to ensure that activities and control devices used by such facilities are consistent with EPA's goal of preventing contamination of the environment.

(2) Equipment Leaks

In 40 CFR Part 265, Subpart BB, EPA promulgated regulations governing emissions to air from equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight if the unit: is subject to the permitting requirements of 40 CFR Part 270; is not exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a hazardous waste recycling unit that is not a 90-day tank or container) and is located at a hazardous waste management facility otherwise subject to the permitting requirements of 40 CFR part 270; or is exempt from permitting under the provisions of 40 CFR 262.34(a) (i.e., a 90-day tank or container). EPA needs information from generator facilities concerning hazardous waste releases to air from equipment leaks to ensure that activities and equipment used by such facilities are consistent with EPA's goal of preventing contamination of the environment.

SMALL QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Emergency Procedures

EPA promulgated regulations in §262.34 requiring SQGs to immediately notify the National Response Center in the event of a fire, explosion, or other release which could threaten human health outside the facility, or when SQGs have knowledge that a spill has reached surface water. Applicable provisions also require SQGs to document if State or local authorities decline to enter into arrangements to become familiar with the site, and require SQGs to post emergency information near the phone. EPA needs this information in order to evaluate and, if necessary, respond to releases of hazardous waste into the environment. It also increases the likelihood that appropriate procedures are in place in case of an emergency. This information also contributes to EPA's goal of quickly responding to, and minimizing the deleterious effects of, hazardous waste releases into the environment.

(2) Requests for Extensions of the Accumulation Period

EPA promulgated regulations in §262.34(f) allowing SQGs to request from the Regional Administrator extensions (up to 30 days) of the accumulation period limit for unforeseen, temporary, and uncontrollable circumstances. EPA needs information about the extension to evaluate the cause of the generators' requests for extensions. These requirements ensure that only generators genuinely in need of an extension are allowed to accumulate wastes longer than 180/270 days (depending on the distance to an off-site destination), and contribute to EPA's goal of preventing contamination of the environment.

RECORDKEEPING AND REPORTING REQUIREMENTS

Authority for the requirements in this part are derived from RCRA §§2002 and 3002. In §3002(a)(5), Congress directed EPA to establish requirements regarding "recordkeeping practices that accurately identify the quantities of such hazardous waste generated, the constituents thereof which are significant in quantity or in potential harm to human health or the environment, and the disposition of such wastes." In §2002(a)(1), furthermore, Congress authorized the Administrator to "prescribe, in consultation with Federal, State, and Regional authorities, such regulations as are necessary to carry out his functions." By requiring generators to keep copies of test results, waste analyses, or other records documenting that a waste is hazardous to submit additional reports requested by EPA, both EPA and the generators will have a better understanding of which waste streams at a facility are hazardous wastes. In addition, generators will have more immediate access to the information describing their hazardous wastes' composition; this information may be extremely important to prevent accidental releases (along with the resulting environmental and human health problems). Finally, this information may be useful to the generators in complying with reporting requirements of other environmental laws.

EXPORT REQUIREMENTS

Authority for the export informational requirements in this part is derived from RCRA §3017. In RCRA §3017, Congress directed EPA to implement requirements for individuals exporting hazardous waste from the United States, including a notification of the intent to export, and an annual report summarizing the types, quantities, frequency, and ultimate destination of all exported hazardous waste. EPA also added additional requirements for generators to renotify the EPA if the conditions of the original notification are altered and keep copies of relevant documents for a period of three years. EPA needs this additional information to ensure that foreign governments consent to U.S.-exported waste, to document that exported waste is actually managed at facilities listed in the original notifications, and to guarantee that these documents are available for compliance audits and any enforcement actions. These requirements contribute to EPA's goal of ensuring that all hazardous waste generated in the United States is managed in a manner protective of human health and the environment. EPA may also request that primary exporters provide additional information, as requested by the receiving country.

2(b) <u>USE AND USERS OF THE DATA</u>

LARGE QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Personnel Training

Both EPA and LQGs use information in the personnel training records to ensure that personnel acquire the necessary expertise to perform their jobs. During inspections, EPA reviews job descriptions and training documents to determine whether each person is receiving a level of training that is commensurate with the person's duties and responsibilities as well as the ability to respond to any emergency situations at the facility.

(2) Contingency Plan and Emergency Procedures

Local emergency response teams, LQGs, and EPA use information included in the contingency plan to assure an appropriate response to any unplanned release of hazardous waste or hazardous waste constituents. EPA reviews information in the contingency plan and emergency report to determine whether additional site-specific emergency provisions are necessary.

EPA, as well as local and State government agencies responding to any releases, use the information submitted by LQGs under §262.34 to document and respond to any spills or other unplanned releases of hazardous wastes into the environment.

(3) Tank Systems

In §262.34(a)(1), EPA required LQGs that accumulate hazardous waste in tank systems to comply with standards detailed in Part 265 Subpart J. The following lists each information collection requirement that applies to tank systems and describes how EPA uses the information.

- A no-free-liquids demonstration (§265.190(a)). EPA uses this demonstration to decide whether it may exempt LQGs that meet this and other conditions (using tanks that contain no free liquids and are situated in a building with an impermeable floor) from the requirements of §265.193.

- Existing tank system assessments (§265.191). EPA uses this information to assure that LQGs operating tank systems without secondary containment carefully evaluate the tank systems' primary containment capability to ensure that the tank systems are not leaking.

- New tank system assessments and certifications (§265.192). EPA uses new tank system assessments and certifications to assure that any new system components installed at LQG facilities are appropriate for and will adequately contain hazardous waste.

- An equivalent containment exemption (§265.193(d)(4)). EPA may grant this exemption to LQGs that can demonstrate that their release containment system is equivalent to a liner, vault, or double-walled tank. This exemption lessens the burden on LQGs without compromising public health or the environment.

- An exemption from the 24-hour leak detection requirement (§265.193(e)(3)(iii)). EPA may grant this exemption to LQGs that can demonstrate that existing technologies or site conditions will not allow detection of a leak within 24 hours. The exemption allows these LQGs to use a system that will detect failure or contamination at the earliest practicable time.

- A variance from secondary containment requirements (§265.193(g)). EPA may grant LQGs a variance from all secondary containment requirements if they can demonstrate that alternative design and operating practices, together with location characteristics, will be as protective of the environment as secondary containment. This variance lessens the burden on LQGs without compromising public health or the environment.

- A notification of intent to conduct and submit a demonstration for a variance from secondary containment (§265.193(h)). The Regional Administrator must be notified of the intent of an owner or operator to conduct and submit a demonstration for a variance from secondary containment so that EPA can evaluate and the public can participate in the process and to reduce the burden and costs without compromising protection of human health and the environment.

- Annual leak tests and inspections for LQGs using tanks that do not meet the secondary containment requirements (§265.193(i)). EPA uses this information to ensure that hazardous wastes are not leaking into the environment.

- An exemption from the 24-hour waste removal requirement (§265.196(b)). EPA uses information submitted by LQGs under these sections to decide whether to grant the

exemptions. EPA regulations require facilities at which there has been a spill to remove, within 24 hours, enough waste from the system to prevent further release and allow for inspection and repair of the tank. If the LQG can demonstrate that it is not possible to do so within 24 hours, EPA will allow the LQG to remove the waste at the earliest practicable time.

- Release notifications and reports, and major repair certifications (§265.196(d) and (f)). EPA uses release notifications and reports to document hazardous waste releases and track the progress of their cleanup. In cases in which a release has been caused by major system damage, the Agency uses the certifications to document that the system has been adequately repaired.

(4) Drip Pads

EPA requires LQGs that accumulate hazardous waste on drip pads to comply with contingency plan, assessment, upgrading, repair, and release-related information collection requirements, as well as to document the proper use of drip pads and compliance with 90 day waste removal requirements (§262.34(a)(1)(iii)). EPA uses these data to ensure that drip pads that are exempt are protective of health and the environment, as well as to ensure that pads are designed, improved, repaired and used in a manner that is environmentally sound. Moreover, EPA uses this information to document compliance with the limitations placed on generators using drip pads for 90-day storage.

(5) Containment Buildings

EPA requires LQGs that accumulate hazardous waste in containment buildings to comply with certification, release notification, repair, and design-related requirements as well as to document the existence of storage procedures that ensure the waste remains in the unit for no more than 90 days, that waste generation and management practices are consistent with 90-day storage, that these procedures are complied with, or that the unit is emptied at least every 90 days (§262.34(a)(1)(iv)). EPA uses this data to ensure that the containment building is designed according to applicable standards, that releases are reported and documented, and that necessary repairs are documented. The Agency also uses this information to document compliance with the 90-day limit on waste storage. Overall, these requirements ensure that containment buildings are used in a manner that is protective of human health and the environment.

(6) Requests for Extensions of the Accumulation Period

EPA uses the information submitted in the accumulation extension period request to determine whether a generator should be granted additional time to accumulate waste on-site in unforeseen, temporary, and uncontrollable circumstances.

LARGE QUANTITY GENERATOR AIR EMISSION STANDARDS REQUIREMENTS

(1) Process Vents

Records and reports required in 40 CFR Part 265, Subpart AA are used to enable EPA to: (1) identify generators that are not in compliance with the standard and (2) to ensure that the standards required by Section 3004(n) are being implemented effectively. Based on reported information, EPA can decide how many generator inspections will be needed, which generators should be inspected, and what records or processes should be reviewed at the generator unit. The records that generators will maintain will play a significant role for the unit owner or operator in assessing unit personnel efforts and in determining whether the unit is in compliance with the standard. The records will reveal misunderstandings about how the standard is to be implemented.

(2) Equipment Leaks

Records and reports required in 40 CFR Part 265, Subpart BB are used to enable EPA to: (1) identify generators that are not in compliance with the standard and (2) to ensure that the standards required by Section 3004(n) are being implemented effectively. Based on reported information, EPA can decide how many generator inspections will be needed, which generators should be inspected, and what records or processes should be reviewed at the generator. The records that generators will maintain play a significant role for the unit owner or operator in assessing unit personnel efforts and in determining whether the unit is in compliance with the standard. The records will reveal misunderstandings about how the standard is to be implemented.

SMALL QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Emergency Procedures

EPA, as well as local and State government agencies responding to any releases, uses the information submitted by SQGs under §262.34(d)(5) to document and respond to any spills or other unplanned releases of hazardous wastes into the environment. EPA also uses this information to assess the needs and state of readiness of generators and to facilitate appropriate responses in cases of an emergency.

(2) Requests for Extensions of the Accumulation Period

EPA uses the information submitted in the accumulation period extension to determine whether an SQG should be granted additional time to accumulate waste on site in unforeseen, temporary, or uncontrollable circumstances.

RECORDKEEPING AND REPORTING REQUIREMENTS

In monitoring compliance and enforcing regulations, EPA relies on the recordkeeping requirements in §§262.40 and .43 to provide a record of generators' hazardous waste generation and its eventual disposition.

EXPORT REQUIREMENTS

EPA uses the information submitted by primary exporters to notify and seek consent of, in conjunction with the Department of State, the receiving country and any transit country of the export of hazardous waste. EPA also uses the export information to document that hazardous wastes being shipped to foreign treatment, storage, and disposal facilities are not diverted to other destinations.

3. THE RESPONDENTS AND THE INFORMATION COLLECTED

3(a) RESPONDENTS/SIC CODES

The following is a list of Standard Industry Classification (SIC) codes associated with generators most likely to be affected by the generator information requirements covered under this ICR:

22 - Textile Mills
27 - Printing and Publishing
29 - Petroleum Refining and Related Industries
30 - Rubber and Miscellaneous Plastic

33 -	Primary Metals Industries
34 -	Fabricated Metal Products, Except Machinery and Transportation Equipment
35 -	Industrial and Commercial Machinery and Computer Equipment
36 -	Electronic and Other Electrical Equipment and Components, Except Computer Equipment
37 -	Transportation Equipment
38 -	Measuring, Analyzing, and Controlling Instruments; Photographic, Medical, and Optical Goods; Watches and Clocks
39 -	Miscellaneous Manufacturing Industries
42 -	Motor Freight Transportation and Warehousing
49 -	Electric, Gas, and Sanitary Services
80 -	Health Services
99 -	Nonclassifiable Establishments
261 - 267	Pulp and Paper
281 -	Industrial Inorganic Chemicals
282 -	Plastic Materials, Synthetic Resins, etc.
283 -	Drugs
284 -	Soap, Detergents, etc.
285 -	Paints, Varnishes, etc.
286 -	Industrial Organic Chemicals
308 -	Miscellaneous Plastic Products
461 -	Pipelines, except Natural Gas
517 -	Wholesale Petroleum Marketing
551 -	Motor Vehicle Dealers (New and Used)
721 -	Laundry Cleaning and Garment Services
726 -	Funeral Services and Crematories
738 -	Miscellaneous Business Service
753 -	Automotive Repair Shops
822 -	Colleges, Universities, Professional Schools and Junior Colleges
873 -	Research, Development and Testing Services
0723 -	Crop Preparation Services for Market, except Cotton Ginning
2821 -	Plastic Materials
2822 -	Synthetic Rubber
2823 -	Synthetic Fibers
2824 -	Synthetic Fibers
2421 -	Lumber and Wood Products
2491 -	Wood Preserving
2499 -	Lumber and Wood Products
2865 -	Organic Chemicals Petroleum Refining and Related Products
2869 -	Organic Chemicals Petroleum Refining and Related Products
3011 -	Tires and Inner Tubes
3111 -	Leather Tanning and Finishing
3253 -	Ceramic Wall and Floor Tile
3292 -	Asbestos Products
3851 -	Ophthalmic Goods
5093 -	Scrap and Waste Materials
8999 -	Services, not elsewhere classified
9511 -	Air and Water Resource and Solid Waste Management
9711 -	National Security

3(b) INFORMATION REQUESTED

EPA requires generators to provide data in the following four areas: pre-transport requirements (with separate requirements for large and small quantity generators), air emission standards requirements, recordkeeping and reporting, and exports of hazardous waste. Under §266.70, EPA also requires facilities that generate hazardous materials which are later reclaimed to recover precious metals to comply with generator requirements described in this ICR. This section will address (i) the data items required and (ii) the respondent activities necessary in meeting these requirements for each of these three areas.

LARGE QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

Large quantity generator pre-transport requirements comprise six distinct categories of informational requirements: personnel training, contingency planning and emergency procedures, tank systems, drip pads, containment buildings, and requests for extensions of the accumulation period.

(1) Personnel Training

In §262.34(a)(4), LQGs must comply with requirements in §265.16(d) and (e). Section 265.16(d) requires LQGs to maintain copies of personnel training documents and records at the facility.

(i) Data items

These documents should include the following data items:

- Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- Written job description for each position, which includes the necessary skill, education, or other qualifications and duties of employees assigned to each position;
- Written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and
- Records that document that the training or job experience required have been given to, and completed by, facility personnel.

(ii) Respondent activities

Respondents must perform the following activities to comply with the requirements in Section 265.16(d) and (e):

- Collect the data items listed above; and
- Maintain (e.g., photocopying and filing) the information at the facility.

(2) Contingency Plan and Emergency Procedures

In §262.34(a)(4), LQGs are required to comply with the preparedness and prevention and contingency plan and emergency procedure requirements in Subparts C and D of Part 265. Section 265.37(b) requires generators to note whether local authorities decline to enter into agreements to become more familiar with the generator's facility and its wastes. Section 265.51 requires LQGs to have

a contingency plan for their facilities. Section 265.53(a) requires the generators to maintain a copy of an updated contingency plan at the facility. Data elements required by this plan are outlined in §265.52.

(i) Data items

These contingency plans should include the following data items:

- A description of the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at this facility;
- A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services;
- An updated list of the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators plus designated as primary emergency coordinators and alternates listed in order;
- An updated list of all emergency equipment at the facility and the location, physical description, and capabilities of the emergency equipment. The contingency plan should also indicate where the emergency equipment will be required; and
- An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary including a description of signals used to begin evacuation, evacuation routes, and alternate routes.

In addition, LQGs must document whether State or local authorities decline to enter into agreement to become more familiar with the LQG's facility and its waste.

(ii) Respondent activities

In order to comply with these requirements, generators are required to perform the following activities:

- Collect the data required in the contingency plan;
- Note, where appropriate, whether State or local authorities decline to enter into agreement to become familiar with the LQG's facility and its wastes;
- Write the contingency plan;
- Keep a copy of the contingency plan on-site;
- Submit copies of plan to local police departments, hospitals, and state local emergency response teams; and
- Amend the contingency plan when appropriate.

Section 265.56(d) requires LQGs to immediately report their findings ("emergency coordinators emergency report") if they determine that their facilities have had releases, fires, or explosions that could threaten human health or the environment outside the facilities.

(i) Data items

The emergency notification report must include the following data items:

- Name and telephone number of reporter;
- Name and address of facility;
- Time and type of incident;
- Name and quantity of material(s) involved;
- The extent of injuries; and
- Possible hazards to human health or the environment outside the facility.

(ii) Respondent activities

In order to prepare an emergency report, generators and emergency coordinators must conduct the following activities:

- Collect the information required in the emergency report;
- Write the report; and
- Call On-Scene Coordinator (OSC) for that geographical area or the National Response Center and notify local authorities if local evacuation advisable.

Section 265.56(i) states that LQGs should notify the Regional Administrator and appropriate State and local authorities that their facilities are in compliance with 265.56(h) and note same in operating record before resuming operations in the affected area(s) of the facilities. Within 15 days of the incident, LQGs are required, under Section 265.56(j) to submit a written report on the incident to the Regional Administrator.

(i) Data items

The report must include the following data items:

- Name, address, and telephone number of the generator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident;
- Name and quantity of material(s) involved;
- The extent of injuries;
- An assessment of actual or potential hazards to human health or the environment; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

(ii) Respondent activities

In order to prepare an emergency report, generators and emergency coordinators must conduct the following activities:

- Collect the information required in the emergency report;
- Write the emergency notification report; and
- Submit the report.

In addition to preparing an emergency report, LQGs must notify the Regional Administrator that their facilities are in compliance with §265.56(h) before resuming operations in affected areas of the facilities. Respondents must perform the following activities to comply with this requirement:

- Compile information that demonstrates that all affected areas are in compliance;
- Prepare a letter notifying the Regional Administrator of this compliance; and
- Submit the report.

(3) Tank Systems

In §262.34(a)(1), LQGs that use tanks to accumulate hazardous waste for 90 days or less are required to comply with the requirements in 40 CFR Part 265 Subpart J. These regulations require LQGs that use tank systems for accumulating hazardous waste to conduct several reporting and recordkeeping activities. These include: demonstrating the absence of free liquids in accumulated wastes, assessing the integrity of existing tank systems, assessing and keeping records on new tank systems or components, submitting information for containment and detection variances and exemptions, conducting required inspections, and reporting releases and information pertinent to releases.

(a) No Free Liquids Demonstration

Section 265.190(a) exempts LQGs from the requirements of §265.193 (containment and detection of releases) provided that the tanks are located in buildings with impermeable floors and are used to accumulate wastes that contain no free liquids.

(i) Data items

LQGs must demonstrate the absence of free liquids by using EPA Method 9095 (Paint Filter Liquids Test) as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication No. SW-846) in order to be exempt from these requirements. The data items for demonstrating the absence of free liquids include the results of the Paint Filter Liquids Test, performed as specified in SW-846.

(ii) Respondent activities

Respondents must perform the following activities in performing this demonstration:

- Perform the test; and
- Place copy of results in record.

(b) Assessments of Existing Tank Systems' Integrity

Section 265.191 requires LQGs with tank systems that 1) accumulate waste that became hazardous after July 14, 1986 and 2) do not meet the secondary containment requirements of §265.193 to determine if their tank systems are sufficient for accumulating hazardous waste.

(i) Data items

For each existing tank system, the data items required for this determination include a written assessment that has been reviewed and certified by an independent, qualified registered professional engineer in accordance with §270.11(d). At a minimum, the assessment must consider the following:

- The design standards to which the tank and ancillary equipment were constructed;
- Hazardous characteristics of the waste(s) that has been and will be handled;
- Existing corrosion protection measures;
- The tank's documented or estimated age; and
- Results of a leak test performed as specified in §265.191(b)(5)(i) and (ii).

(ii) Respondent activities

Respondents must perform the following activities in assessing their tank systems:

- Perform the leak test as specified in §265.191(b)(5)(i) and (ii);
- Obtain the written assessment certified by an independent, qualified and registered professional engineer that attests to the tank system's integrity; and
- File the assessment at the facility.

(c) Design and Installation of New Tank Systems or Components

Section 265.192 requires LQGs that install new tank systems or components to obtain written assessments attesting that their tank systems are acceptable for storing hazardous wastes. In addition, LQGs must obtain and keep on file at the facility statements written by those who designed the tank systems and supervised their construction. These statements will verify that the systems were designed and constructed properly.

(i) Data items

The data items for these requirements include:

- For each new tank system, a written assessment that has been reviewed and certified by an independent, qualified, registered professional engineer in accordance with §270.11(d). At a minimum, the assessment must report on the following:
  - -- The design standards to which the tank and ancillary equipment were constructed;
  - -- Hazardous characteristics of the waste(s) to be handled;

- -- For new systems or components in which any external metal component of the tank system will be in contact with soil or water, a determination by a corrosion expert of the factors affecting the potential for and protection from corrosion as specified in §265.192(a)(3)(i) and (ii);
- -- For underground tank systems likely to be adversely affected by vehicular traffic, the design or operational measures that will protect the tank system from damage; and
- -- Design considerations to ensure that: 1) tank foundations will maintain the load of a full tank, 2) the systems are anchored so that they will not float or dislodge when placed in a saturated or seismic fault zone, and 3) the systems will withstand the effects of frost heave.

- Maintain records of statements written by those who certify the tank system's design and supervise its installation (§265.192(g)). These records must verify that the system was designed and installed according to the regulatory requirements, and that any needed repairs were performed. They must also include the certification statement as required in §270.11(d).

(ii) Respondent activities

Respondents must perform the following activities in complying with these requirements:

- Obtain the written assessment and have it reviewed and certified;
- Obtain written statements from those who certified the design of the tank system and supervised its installation; and
- File the written statements at the facility.

(d) Containment and Detection of Releases

Section 265.193 requires LQGs operating tank systems to have secondary containment that will prevent the release of hazardous constituents into the environment. New tank systems must have the containment installed prior to their being put into service. The dates by which containment must be installed on existing tank systems depend upon the waste types handled, the system's age, and other factors. The information collection requirements in this section include reports to the Regional Administrator that, upon approval, will exempt, when appropriate, tank system generators from specific secondary containment standards. In addition, §265.193(g) allows LQGs to obtain variances from all secondary containment requirements if they can demonstrate to the Regional Administrator that alternative design and operating practices, together with location characteristics, will be as protective of the environment as secondary containment.

Section 265.193(d) requires all secondary containment for tank systems to include one or more of the following devices: a liner; a vault; a double-walled tank; or an equivalent device, as approved by the Regional Administrator. Though some respondents may choose to use a previously-approved containment device, this ICR assumes that generators will submit to the Regional Administrator written information regarding the design and type of device, as well as additional information that may be necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank.

(i) Data items

The data items required to obtain approval for an equivalent containment device include written information regarding the design and type of containment device as well as additional information that may be necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank.

(ii) Respondent activities

Respondents must perform the following activities in obtaining approval for their equivalent containment device:

- Gather information regarding the design and type of containment device as well as additional information necessary to substantiate a claim that the device is equivalent to a liner, vault, or double-walled tank; and

- Submit the information to the Regional Administrator.

Section 265.193(e)(3)(iii) requires secondary containment systems to have a leak detection system that will detect a release within 24 hours. If LQGs can demonstrate to EPA that existing technologies or site conditions will not allow detection within 24 hours, they may use a leak detection system that will detect failure or contamination "at the earliest practicable time."

(i) Data items

The data items required for this demonstration include any such evidence regarding existing technologies or site conditions sufficient to show that the leak detection system cannot detect failure or contamination within 24 hours.

(ii) Respondent activities

Respondents must perform the following activities in obtaining an exemption from the 24-hour detection requirement:

- Compile evidence showing that the leak detection system cannot detect failure or contamination within 24 hours; and

- Submit the evidence to the Regional Administrator.

Section 265.193(g) allows LQGs to obtain a variance from all secondary containment requirements if they can demonstrate to the Regional Administrator that alternative design and operating practices, together with location characteristics, will prevent the migration of hazardous constituents into the ground water or surface water as effectively as secondary containment. In the event of a release that does migrate to ground or surface water, facilities must demonstrate the release will pose no substantial hazard.

(i) Data items

The data items required to obtain a variance from secondary containment include a written notification to the Regional Administrator indicating intent to conduct and submit a demonstration for a variance from secondary containment. This notification must contain:

- Description of the steps necessary to conduct the demonstration (which must address each factor listed in §265.193(g)(1) and (2)); and

- Timetable for completing each step.

(ii) Respondent activities

Respondents must perform the following activities in obtaining a variance from secondary containment:

- Prepare the notification of intent to conduct a demonstration;

- Submit the notification to the Regional Administrator (for existing tank systems, notification must be submitted 24 months prior to the date at which secondary
- containment must be provided; for new systems, notification must be submitted at least 30 days before entering into a contract to install the system);

- Complete the demonstration in accordance with §265.193(g)(1) and (2); and

- Submit the completed demonstration to the Regional Administrator within 180 days of submitting the notification.

Section 265.193(i) requires LQGs, until they meet the secondary containment requirements, to conduct annual leak tests and/or inspections of their tanks and ancillary equipment. Records of these assessments must be kept on file at the facility.

(i) Data items

The data items required for this recordkeeping requirement is the record of the results of the leak tests and/or inspections (§265.193(i)).

(ii) Respondent activities

Respondents must perform the following activities in filing a record of the assessment results:

- For non-enterable underground tanks, conduct a leak test that meets the requirements of §265.191(b)(5);

- For all other tanks and for ancillary equipment, conduct an annual leak test that meets the requirements in §265.191(b)(5) or have the tanks and equipment inspected as described in §265.193(I)(1);

- Record the inspection and/or test results; and

- Maintain on file at the facility a record of the results.

(e) Responses to Leaks or Spills; Disposition of Leaking or Unfit-for-Use Tank Systems

Section 265.196 requires LQGs with a tank system or secondary containment system from which there has been a spill to remove it from service immediately. Section 265.196(b) requires LQGs, within 24 hours, to remove enough waste from the system to prevent further release and allow for inspection

and repair of the tank. If the LQG can demonstrate that it is not possible to do so within 24 hours, the waste may be removed at the earliest practicable time.

(i) Data items

The data items required for this demonstration include any such evidence sufficient to show that, within 24 hours, the generator cannot remove enough waste from the system to prevent further release and allow for system inspection and repair.

(ii) Respondent activities

Respondents must perform the following activities in making this demonstration:

- Compile evidence showing that, within 24 hours, enough waste cannot be removed from the system to prevent further release and allow for system inspection and repair; and

- Submit the evidence to the Regional Administrator.

Section 265.196(d) requires LQGs to comply with certain reporting requirements in the case of a leak or spill. LQGs must notify the Regional Administrator of any release to the environment (except as defined in §265.196(d)(2)) within 24 hours of detection (if the release has been reported pursuant to 40 CFR Part 302 (CERCLA §103), that report will satisfy this requirement), and submit a detailed report within 30 days. In addition, if the generator has made major repairs to the system, §265.196(f) requires that generators submit to the Regional Administrator a certification of major repairs. This certification, obtained by an independent qualified registered professional engineer in accordance with §270.1(d), documents that the system has been repaired and is capable of handling hazardous waste without release, and must be submitted to the Regional Administrator within seven days of returning the system to use.

(i) Data items

The data items required for release notifications and reports include:

- A notification to the Regional Administrator that there has been a release;

- A report to the Regional Administrator containing the following information:

  -- The release's likely migration route;
  -- The surrounding soil characteristics;
  -- The results of any monitoring or sampling conducted in connection with the release (if not available within 30 days, results must be submitted as soon as practicable);
  -- The release's proximity to downgradient drinking water, surface water, and population areas; and
  -- A description of the response actions taken or planned.

- The data items required for a certification of major repairs include a certification by an independent, qualified, registered professional engineer in accordance with §270.11(d) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system.

(ii) Respondent activities

Respondents must perform the following activities in preparing and submitting release notifications and reports:

- Within 24 hours of detection, notify the Regional Administrator that there has been a release;
- Within 30 days of detection, prepare a detailed report for submission to the Regional Administrator. In order to do so, generators must:
  - -- Determine the release's likely migration route;
  - -- Provide information on the surrounding soil characteristics;
  - -- Conduct appropriate monitoring or sampling;
  - -- Determine the release's proximity to downgradient drinking water, surface water, and population areas;
  - -- Describe the response actions taken or planned; and
  - -- Compile and submit the report to the Regional Administrator.
- Submit the report.

Respondents must perform the following activities in preparing and submitting a certification of major repairs:

- Obtain a certification from an independent, qualified, registered professional engineer, in accordance with §270.11(d); and
- Within seven days of returning the system to use, submit the certification to the Regional Administrator.

(4) Drip Pads

Under §262.34(a)(1)(iii), EPA requires LQGs that accumulate hazardous waste on drip pads to comply with contingency plan, assessment, upgrading, repair, and release-related information collection requirements, as well as to document the proper use of drip pads and compliance with 90 day waste removal requirements.

(a) Contingency Plan

Section 265.440(c)(1) provides that facilities with infrequent and incidental drippage in storage yards may be exempt from drip pad requirements if they prepare a contingency plan that responds to such drippage.

(i) Data items

The data items for this requirement include:

- Maintenance of contingency plan that addresses clean-up of incidental drippage; and
- Records of clean-up.

(ii) Respondent activities

Respondents must perform the following activities:

- Prepare contingency plan;
- Document clean-up of incidental drippage; and
- Retain documentation for 3 years.

(b) Adequacy of Existing Drip Pads

Sections 265.441(a), (b) and (c) require generators using drip pads to maintain on file an assessment of pad integrity, prepare and submit a plan for upgrading the pad (as necessary to meet applicable regulation) to the Regional Administrator, and submit drawings and a certification of the pad to Regional Administration.

(i) Data items

The data items for this requirement include:

- An assessment of pad integrity;
- A plan for upgrading the pad to meet the applicable regulatory standards; and
- Drawings of the pad and a certification by an independent, qualified, registered professional engineer that upon completion of repairs and modifications the pad conforms to the drawings.

(ii) Respondent activities

Respondents must perform the following activities:

- Prepare and maintain an assessment of pad integrity;
- Prepare a plan for upgrading the pad to meet the applicable regulatory standards; and
- Prepare drawings of the pad and obtain the certification of an independent, qualified, registered professional engineer that the pad conforms to the drawings.

(c) Design and Operating Requirements

Section 265.443 requires that generators using drip pads must maintain an assessment of the drip pad and records of any release of hazardous waste. These generators must also notify the Regional Administrator and provide written notice of any release of hazardous waste as well as of the completion of modifications or repairs. Certification of such modifications or repairs is also required. Finally, generators using drip pads must document operating and waste handling practices in their operating log.

(i) Data items

The data items for this requirement include:

- An assessment of the drip pad reviewed and certified by an independent, qualified, registered professional engineer;
- A record of any condition contributing to or actual release of hazardous waste from the drip pad;
- Notice to the Regional Administrator of any release of hazardous waste;
- Notice to the Regional Administrator of completion of any repairs required to meet applicable standards and certification of an independent, qualified, registered professional engineer that the repairs satisfy applicable standards; and
- Documentation of operating and waste handling practices.

(ii) Respondent activities

Respondents must perform the following activities:

- Prepare an assessment of the drip pad and have the assessment certified by an independent, qualified, registered professional engineer;
- Place a record of any condition contributing to or actual releases of hazardous waste from the drip pad in the operating log;
- Notify the Regional Administrator of releases of hazardous waste and provide written notice of same;
- Provide notice to the Regional Administrator of the completion of any repairs required to meet applicable standards;
- Provide a copy of the certification of an independent, qualified, registered professional engineer that the repairs satisfy applicable standards to the Regional Administrator; and
- Prepare documentation of operating and waste handling practices.

(d) Certification of Liner

Section 265.444(a) requires generators using drip pads to place a certification of the adequacy of the liner in their operating log.

(i) Data items

The data items for this requirement include:

- Certification by an independent, qualified, registered professional engineer that following construction or installation the liner meets the specified regulatory standard.

(ii) Respondent activities

Respondents must perform the following activities:

- Obtain the certification of an independent, qualified, registered professional engineer that following construction or installation the liner meets the specified regulatory standard; and

- Place the certification in the operating log.

(e) Documentation of Waste Removal

Section 262.34(a)(1)(iii) requires generators using drip pads to maintain a description of their 90-day waste removal practices and to document each waste removal.

(i) Data items

The data items for this requirement include:

- A description of 90-day waste removal practices; and

- Documentation of each waste removal.

(ii) Respondent activities

Respondents must perform the following activities:

- Prepare a description of 90-day waste removal practices; and

- Document each waste removal.

(5) Containment Buildings

Under §262.34(a)(1)(iv), EPA requires LQGs that accumulate hazardous waste in containment buildings to comply with certification, release notification, repair, and design-related requirements as well as to document storage procedures, waste generation and management practices, compliance with procedures, and that the unit is emptied at least every 90 days.

(a) Design and Performance Documentation

Section 265.1101(c) and (d) require that generators using containment buildings must place a certification of compliance with applicable standards in the record, record releases of hazardous waste, and notify the Regional Administrator of dangerous conditions or releases of waste within 7 days and provide written notice within 14 days. These generators must notify Regional Administrator upon completion of repairs. They must also record and place in the operating plan every 7 days information about operating procedures used to verify the integrity of areas lacking secondary containment (only in buildings that contain areas both with and without secondary containment).

(i) Data items

The data items for this requirement include:

- A certification of an independent, qualified, registered professional engineer that the design of the containment building meets applicable regulatory standards;

- Records of any release of hazardous waste from a containment building;

- Notification of the Regional Administrator of any release of hazardous waste within 7 days followed by written notice within 14 days;
- Notification of the Regional Administrator of the completion of required repairs or clean-up; and
- Monitoring data and leak detection data.

(ii) Respondent activities

Respondents must perform the following activities:

- Obtain the certification of an independent, qualified, registered professional engineer that the design of the containment building meets applicable regulatory standards;
- Place the certification in the operating record;
- Maintain records of any release of hazardous waste from a containment building;
- Notify the Regional Administrator of any condition contributing to or actual releases of hazardous waste within 7 days, and provide follow-up written notice within 14 days of a release;
- Notify the Regional Administrator of the completion of required repairs or clean-up; and
- Record monitoring data and leak detection data and place that data in the operating record at least every 7 days.

(b) Documentation of Areas Lacking Secondary Containment

Section 265.1101(d) requires generators using containment buildings to place a description of the facility's procedures to maintain the integrity of areas lacking secondary containment in their operating log. This requirement only applies to containment buildings that contain areas both with and without secondary containment.

(i) Data items

The data items for this requirement include:

- Description of procedures to maintain integrity of areas lacking secondary containment.

(ii) Respondent activities

Respondents must perform the following activity:

- Place description of the facility's procedures to maintain the integrity of areas lacking secondary containment in the operating log.

(c) Documentation of Procedures and Compliance

Section 262.34(a)(1)(iv) provides that generators using containment buildings must develop written procedures to ensure that waste stored for 90 days or less. These generators must also describe

their waste generation and management practices and document that procedures ensuring limited storage are satisfied. Finally, these generators must document that their containment building is emptied at least once every 90 days.

(i) Data items

The data items for this requirement include:

- A written description of the procedures to ensure that waste is stored no more than 90 days;
- A written description of the waste generation and management practices showing they are consistent with such 90 day storage;
- Documentation that procedures restricting the time of storage are satisfied; and
- Documentation that the unit is emptied at least once every 90 days.

(ii) Respondent activities

Respondents must perform the following activities:

- Prepare a written description of the procedures to ensure that waste is stored no more than 90 days;
- Prepare a written description of the waste generation and management practices showing they are consistent with such 90 day storage;
- Prepare documentation that 90-day storage procedures are satisfied; and
- Prepare documentation that the unit is emptied at least once every 90 days.

(6) Requests for Extensions of the Accumulation Period

In the case of an unforeseen, temporary, or an uncontrollable circumstance, §262. 34(b) allows large quantity generators to apply for up to a 30-day extension of the 90-day accumulation period limit. At the discretion of the Regional Administrator, these extensions will be granted on a case-by-case basis.

(i) Data items

The data items required in making this request are:

- The unforeseen, temporary, or uncontrollable circumstances causing the need for an extension, and
- The length of desired extension (up to a limit of 30 days).

(ii) Respondent activities

In order to submit this request, the respondent must undertake the following tasks:

- Prepare and submit the request to the Regional Administrator.

LARGE QUANTITY GENERATOR AIR EMISSION STANDARDS REQUIREMENTS

Large quantity generator air emission standards comprise two new categories of informational requirements: air emission standards for process vents and air emission standards for equipment leaks.

(1) Process Vents

(a) Control Device Operation Documentation

40 CFR 265.1033(i) requires owner/operators to prepare documentation describing the operation of control devices different from those specified in §265.1033(f), (g), and (h) and identifying process parameters that indicate proper operation and maintenance of those control devices.

(i) Data items

The data items for this determination include:

- Description of the control device operation; and
- Information on the process parameter or parameters that will be used to indicate proper operation and maintenance of the control device.

(ii) Respondent activities

To comply with §265.1033(i), respondents must perform the following activities:

- Gather information on control device operation and process parameters;
- Document control device operation and process parameter information;
- Maintain documentation at the unit (required under §265.1035(e));
- Reassess control device documentation; and
- Modify control device documentation, if necessary.

(b) Waste Determination

40 CFR 265.1034(d)(2) requires owner/operators to document waste determinations that are based on knowledge of the waste rather than testing.

(i) Data item

Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;
- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by

direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and

- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities

To comply with §265.1034(d)(2), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;
- Document information on production processes, waste generation, and specification analysis; and
- Maintain documentation at the unit.

(c) Unit Operating Record

(i) Data item

Under 40 CFR 265.1035(b) owner/operators are required to record the following information in the unit operating record:

- For facilities that comply with the provisions of §265.1033(a)(2), an implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date;
- Up-to-date documentation of compliance with the process vent standards in §265.1032, including:
  - -- Information and data identifying all affected process vents, annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and for the overall unit, and the approximate location within the unit of each affected unit; and
  - -- Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests;
- Where an owner or operator chooses to use test data to determine the organic removal efficiency or total organic compound concentration achieved by the control device, a performance test plan that includes the following information:
  - -- A description of how it is determined that the planned test is going to be conducted when the hazardous waste management unit is operating at the highest load or capacity level reasonably expected to occur. This shall include the estimated or design flow rate and organic content of each vent stream and define the acceptable operating ranges of key process and control device parameters during the test program; and

-- A detailed engineering description of the closed-vent system and control device, including:

- Manufacturer's name and model number of control device;
- Type of control device;
- Dimensions of the control device;
- Capacity;
- Construction materials; and

-- A detailed description of sampling and monitoring procedures, including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis;

- Documentation of compliance with §265.1033 including the following information:

-- A list of all information references and sources used in preparing the documentation;

-- If engineering calculations are used, a design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on the appropriate sections of "APTI Course 415: Control of Gaseous Emissions" or other engineering texts acceptable to the Regional Administrator that present basic control device design information. Documentation provided by the control device manufacturer or vendor that describes the control device design in accordance with paragraphs (b)(4)(iii)(A) through (b)(4)(iii)(G) of this section may be used;

-- A statement signed and dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur; and

-- A statement signed and dated by the owner/operator certifying that the control device is designed to operate at an efficiency of 95 percent or greater unless the total organic concentration limit of §265.1032(a) is achieved at an efficiency less than 95 percent or the total organic emission limits of §265.1032(a) for affected process vents at the unit can be attained by a control device involving vapor recovery at an efficiency less than 95 weight percent. A statement provided by the control device manufacturer or vendor certifying that the control equipment meets the design specifications may be used to comply with this requirement;

- Design documentation and monitoring, operating, and inspection information for each closed-vent system and control device required to comply with the provisions including:

-- Description and date of each modification that is made to the closed-vent system or control device design;

-- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§265.1033(f)(1) and (f)(2);

-- Monitoring, operating and inspection information required by paragraphs (f) through (k) of §265.1033;

-- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;

-- Explanation for each period recorded under paragraph (4) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;

-- For a carbon adsorption system operated subject to requirements specified in §§265.1033(g) or 265.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;

-- For a carbon adsorption system operated subject to requirements specified in §265.1033(h)(1), a log recording the following information:

- Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and

- Date existing carbon in control device is replaced with fresh carbon;

-- Date of each control device start-up and shutdown; and

- Up-to-date information and data used to determine whether or not a process vent is subject to the requirements in §265.1032 including supporting documentation as required by §265.1034(d)(2) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produces is used.

(ii) Respondent activities

For each data item required in the unit operating record, respondents must perform the following activities:

- Prepare the data item;
- File and maintain the data item in the unit operating record;
- Reassess the data item; and
- Modify the data item, if necessary.

(2) Equipment Leaks

(a) Notification to implement the alternate valve standard specified in §265.1061(a)

(i) Data items

40 CFR 265.1061(b)(1) requires owners or operators that have decided to implement the alternative standard for valves specified in §265.1061(a) to notify the Regional Administrator. No specific data items are to be included in this notification.

(ii) Respondent activities

To comply with §265.1061(b)(1), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

(b) Notification to discontinue implementing the alternative valve standard specified in §265.1061(a)

(i) Data items

40 CFR 265.1061(d) requires owners or operators that no longer wish to implement the alternative standard for valves specified in §265.1061(a) to notify the Regional Administrator. No specific data items are to be included in this notification.

(ii) Respondent activities

To comply with §265.1061(d), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

(c) Notification to implement the alternative valve standard specified in §§265.1062(b)(2), or 265.1062(b)(3).

(i) Data items

40 CFR 265.1062(a)(2) requires owners or operators that have decided to implement the alternative standard for valves specified in §§265.1062(b)(2), or 265.1062(b)(3) to notify the Regional Administrator. No specific data items are to be included in this notification.

(ii) Respondent activities

To comply with §265.1062(a)(2), respondents must perform the following activities:

- Prepare notification; and
- Submit notification to the Regional Administrator.

(d) Non-Hazardous waste documentation

(i) Data items

40 CFR 265.1063(d)(3), requires owners or operators that determining that each piece of equipment does or does not contain hazardous waste with organic concentration that equals or exceeds 10 percent waste to document the determination if it was based on knowledge rather than testing. Data items required for documenting waste determinations are not specified, but may include the following:

- Production process information documenting that no organic compounds are used;

- Waste generation information documenting that the waste is generated by a process identical to a process at the same or another unit that has previously been demonstrated by direct measurement to generate a waste stream having a total organic content less than 10 ppmw; and

- Prior specification analysis results on the same waste stream where it can be documented that no process changes have occurred since the specification analysis was conducted that could affect the waste total organic concentration.

(ii) Respondent activities

To comply with §265.1063(d)(3), respondents must perform the following activities:

- Gather information on production processes, waste generation, and specification analysis;

- Document information on production processes, waste generation, and specification analysis;

- Maintain documentation at the unit.

(e) Unit operating record

(i) Data item

Under 40 CFR 265.1064(b) owner/operators are required to record the following information in the unit operating record:

- For each piece of equipment to which Subpart BB applies:

  -- Equipment identification number and hazardous waste management unit identification;

  -- Approximate locations within the unit;

  -- Type of equipment;

  -- Percent-by-weight total organics in the hazardous waste stream at the equipment;

  -- Hazardous waste state at the equipment; and

  -- Method of compliance with the standard.

- For facilities that comply with the provisions of §265.1033(a)(2), an implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date;

- Where an owner/operator chooses to use test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device, a performance test plan as specified in §265.1035(b)(3);

- Documentation of compliance with §265.1060, including detailed design documentation or performance test results specified in §265.1035(b)(4);

- When each leak is detected as specified in §§265.1052, 265.1053, 265.1057, and 265.1058, an inspection log that includes the following information:

    -- Instrument and operator identification numbers and the equipment identification number;

    -- The date evidence of a potential leak was found in accordance with §265.1058(a);

    -- The date the leak was detected and the dates of each attempt to repair the leak;

    -- Repair methods applied in each attempt to repair the leak;

    -- "Above 10,000" if the maximum instrument reading measured by the methods specified in §265.1063(b) after each repair attempt is equal to or greater than 10,000 ppm;

    -- "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak;

    -- Documentation supporting the delay of repair of a valve in compliance with §265.1059(c);

    -- The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a hazardous waste management unit shutdown;

    -- The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days; and

    -- The date of successful repair of the leak;

- Design documentation and monitoring, operating, and inspection information for each closed-vent system and control device required to comply with §265.1060 including:

    -- Description and date of each modification that is made to the closed-vent system or control device design;

    -- Identification of operating parameter, description of monitoring device, and diagram of monitoring sensor location or locations used to comply with §§265.1033(f)(1) and (f)(2);

    -- Monitoring, operating and inspection information required by paragraphs (f) through (j) of §265.1033;

    -- Date, time, and duration of each period that occurs while the control device is operating when any monitored parameter exceeds the value established in the control device design analysis;

-- Explanation for each period recorded under paragraph (3) of the cause for control device operating parameter exceeding the design value and the measures implemented to correct the control device operation;

-- For a carbon adsorption system operated subject to requirements specified in §§265.1033(g) or 265.1033(h)(2), date when existing carbon in the control device is replaced with fresh carbon;

-- For a carbon adsorption system operated subject to requirements specified in §265.1033(h)(1), a log recording the following information:

- Date and time when control device is monitored for carbon breakthrough and the monitoring device reading; and

- Date when existing carbon in the control device is replaced with fresh carbon;

-- Date of each control device startup and shutdown; and

- A log recording the following information for all equipment subject to §§265.1052 through §265.1060:

-- A list of identification numbers (except welded fittings) for equipment subject to the standards of Subpart BB;

-- A list of identification numbers for equipment that the owner or operator elects to designate for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, under §§265.1052(e), 265.1053(i), and 265.1057(f)

-- Signed designation of this equipment as subject to the requirements of §§265.1052(e), 265.1053(i), and 265.1057(f) by the owner or operator;

-- A list of equipment identification numbers for pressure relief devices required to comply with §265.1054(a);

-- The dates of each compliance test required in §§265.1052(e), 265.1053(i), 265.1054, and 265.1057(f);

-- The background level measured during each compliance test;

-- The maximum instrument reading measured at the equipment during each compliance test; and

-- A list of identification numbers for equipment in vacuum service;

- A log for all valves subject to §265.1057(g) and (h) that includes the following information:

-- A list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve; and

- -- A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the planned schedule for monitoring each valve

- For valves complying with §265.1062, a log containing the following information:

  - -- A schedule for monitoring; and

  - -- The percent of valves found leaking during each monitoring period;

- A criteria log containing the following information:

  - -- Criteria required in §265.1052(d)(5)(ii) and §265.1053(e)(2) and an explanation of the design criteria; and

  - -- Any changes to these criteria and the reasons for these changes.

- An exemption log containing the following information:

  - -- An analysis determining the design capacity of the hazardous waste management unit;

  - -- A statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to the requirements in §§265.1052 through 265.1060 and an analysis determining whether these hazardous wastes are heavy liquids; and

  - -- An up-to-date analysis and the supporting information and data used to determine whether or not equipment is subject to the requirements in §§265.1052 through 265.1060. The record shall include supporting documentation as required by §265.1063(d)(3) when application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced is used.

(ii) Respondent activities

For each data item required in the unit operating record, respondents must perform the following activities:

- Prepare the data item;

- File and maintain the data item in the unit operating record;

- Reassess the data item: and

- Modify the data item, if necessary.

SMALL QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Emergency Procedures

Section 262.34(d)(5)(iv)(C) requires SQGs to immediately notify the National Response Center "[i]n the event of a fire, explosion, or other release which could threaten human health outside the facility

or when the generator has knowledge that a spill has reached surface water." Applicable provisions also require SQGs to document if State or local authorities decline to enter into arrangements to become familiar with the site, and require SQGs to post emergency information near the phone.

(i) Data items

The data items required in making this report are:

- The name, address, and US EPA identification number of the generator;
- Date, time, and type of incident;
- Quantity and type of hazardous waste involved in the incident;
- Extent of injuries, if any; and
- Estimated quantity and disposition of recovered materials, if any.

In addition, SQGs must include:

- Documentation that local officials decline to enter into arrangements for coordinating response; and
- Emergency information by the phone.

(ii) Respondent activities

In order to submit data items, the respondent must undertake the following tasks:

- Observe the scene of hazardous waste discharge and gather information regarding the incident;
- Report by phone (toll free) the requested data items to the National Response Center;
- Document that local officials decline to enter into arrangements for coordinating response; and
- Post emergency information by the phone.

(2) Requests for Extensions of the Accumulation Period

Section 262.34(f) allows SQGs to apply for up to a 30-day extension of the 180- or 270-day accumulation period limit. At the discretion of the Regional Administrator, these extensions will be granted in a case-by-case basis.

(1) Data items

The data items required in making this request are:

- The unforeseen, temporary, or uncontrollable circumstances causing the need for an extension, and

- The length of desired extension (up to a limit of 30 days).

(ii) Respondent activities

In order to submit this request, the respondent must undertake the following task:

Prepare and submit the request to the Regional Administrator.

RECORDKEEPING AND REPORTING REQUIREMENTS

Sections 262.40 and 43 require all generators to keep records that may be reviewed by EPA during inspections, and to report additional information as required by the Administrator. Section 262.40 requires generators to keep a copy of items, such as the records of test results, for at least three years. Section 262.43 requires generators to furnish additional reports regarding the volume and nature of their hazardous wastes as deemed necessary.

(i) Data items

Respondents must retain at the facility copies of any records of test results, waste analyses, or other determinations. The Administrator may require, as deemed necessary, additional information regarding the quantity and disposition of hazardous wastes.

(ii) Respondent activities

In order to submit the recordkeeping and reporting data items, generators must undertake the following tasks:

- Maintain the test results, waste analyses, or other determinations; and
- Gather and provide any additional information requested by the Administrator.

EXPORTS OF HAZARDOUS WASTES

Sections 262.53 - .57 are requirements for "primary exporters," or the persons shipping or arranging to ship hazardous waste to a TSDF outside the boundaries of the United States. All generators meeting the definition of "primary exporters" are required to notify EPA of their intention to export hazardous waste, renotify the EPA if the conditions of the original notification are altered (including, under certain circumstances, if a shipment cannot be delivered to the designated or alternate consignee for any reason), file an Annual report with the Administrator summarizing the types, quantities, frequencies, and ultimate destination of all hazardous wastes exported during the previous years, and keep copies of relevant documents for a period of three years. EPA may also request that primary exporters provide additional information, as requested by the receiving country.

Section 262.53(a) requires the primary exporters of hazardous wastes to submit a signed notification of intent to export.

(i) Data items

The data items required by this notification include:

- The name, mailing address, telephone number, and EPA ID number of the primary exporter; and

- For each consignee, the following information for hazardous waste type:

  -- A description of the hazardous wastes and EPA waste number and DOT description;
  -- An estimate of the frequency and time period of the shipment to the consignee;
  -- Total quantity of hazardous wastes;
  -- Points of entry of (or departure from) each foreign country;
  -- A description of the means of transportation and the types of containers containing the hazardous wastes;
  -- A description of the waste management techniques to be utilized in managing the wastes in the host countries;
  -- The name and site address, of the consignee and any alternate consignee; and
  -- The name of any countries through which the hazardous wastes will transit, as well as the period of time the wastes will remain in the transit countries and the nature of its handling while there;
  -- After consent is granted, exporter will receive EPA acknowledgment of consent from EPA and must attach acknowledgment of consent to manifest.

(ii) Respondent activities

In order to comply with the notification of intent to export requirements, the primary exporter must undertake the following tasks:

- Collect information; and

- Prepare and submit a notification describing the types, volumes and frequency of shipment of hazardous wastes exported, the point of departure from the United States, any countries through which the wastes will transit, the length of time the wastes remain in transit countries, the means of transportation, the form of packaging used for the hazardous wastes, the name and address of the consignee and the alternate consignee (if any), and any other information requested by the receiving country.

Generators are also required to notify EPA should certain information on the notification be modified, such as an increase of the volume of hazardous wastes shipped, before the hazardous wastes are exported (§262.53(c)). Under §262.54(g), if a shipment cannot be delivered to the designated or alternate consignee for any reason, the primary exporter must either renotify EPA before the delivery of the shipment to a new consignee (in accordance with §262.53(c)), or instruct the transporter to return the waste to the exporter or a management facility in the United States.

(i) Data items

The data items required by this demonstration are a written description of any of the modified notification information. For certain categories of information (e.g., telephone numbers, ports of entry and exit, or decreases in quantity), EPA has waived this renotification requirement. EPA will inform the recipient and transit countries of the changes and, upon their consent, forward to the primary exporter an EPA Acknowledgment of Consent.

(ii) Respondent activities

In order to comply with the renotification of the intent to export requirements, the primary exporter must undertake the following tasks:

- Collect change to export information; and

- Prepare and submit a renotification documenting changes.

- Under §262.53(d), EPA may request that primary exporters submit additional information, as requested by the receiving country.

(i) Data items

The data items required by this demonstration are specified by the receiving country.

(ii) Respondent activities

In order to submit these reporting data items, primary exporters must gather and provide any additional information requested by EPA on behalf of the receiving country.

Section 262.56(a) requires exporters of hazardous wastes to file an annual report with the Administrator summarizing hazardous waste export activities.

(i) Data items

The following data items must be reported annually:

- The EPA identification number, name, and mailing address and site of the exporter;

- The calendar year covered by the report;

- The name and site address of each consignee;

- For each consignee, the following data:

  -- A description of the hazardous waste,
  -- The EPA hazardous waste number,
  -- The DOT hazard class,
  -- The name and US EPA ID number for each transporter used,
  -- The total amount of waste shipped, and
  -- The number of shipments pursuant to each notification;

- A description of efforts undertaken to reduce the volume and toxicity of wastes generated, as well as a description of any variation in the volume and toxicity of wastes relative to previous years (not applicable to SQGs, or to LQGs that submitted this information in a Biennial report); and

- A signed certification.

(ii) Respondent activities

In order to comply with the annual report requirements, the primary exporter must undertake the following tasks:

- Research the information needed; and

- Prepare and submit a report describing the EPA identification number, name, and mailing and site address of the exporter; the calendar year covered by the report; the name and site

address of each consignee; a description of the hazardous waste, the EPA hazardous waste number, the DOT hazardous class, the name and US EPA ID number for each transporter used, the total amount of waste shipped, and the number of shipments pursuant to each notification; and a description of efforts undertaken to reduce the volume and toxicity of wastes generated, a description of any variation in the volume and toxicity of wastes relative to previous years, if applicable. It must also include a signed certification.

Section 262.57(a) requires all primary exporters to keep a copy of certain documents for a period of at least three years after the wastes were accepted by the initial transporter (or longer if requested by the Administrator or if related to an activity subject to an enforcement action):

(i) Data items

The following records must be kept:

- Notification of intent to export;
- EPA acknowledgment of consent;
- Confirmation of delivery from the consignee; and
- Annual report.

(ii) Respondent activities

In order to comply with the recordkeeping requirements, the generator must undertake the following task:

- File and maintain the notification of intent, acknowledgment of consent, confirmation of delivery, Annual, and Exception reports for a period of at least three years.

4. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

The following subsections discuss how EPA will collect the information, what activities EPA will perform once the information has been received, and how EPA will manage the information it collects. The subsections also include a discussion of how the information collection requirements affect small entities.

4(a) AGENCY ACTIVITIES

PRE-TRANSPORT REQUIREMENTS (LQGs)

Although personnel training information is not formally submitted to EPA, EPA may review information collected from the requirements during facility inspections. Therefore, this analysis assumes that the Agency will spend a minimal amount of review time at certain facilities.

Two Agency activities are associated with the development and amendment of the contingency plan: reviewing the contingency plan during on-site inspections and reviewing revisions to the contingency plan. Agency activities associated with emergency reporting requirements include reviewing documents in the emergency coordinators' emergency reports.

Agency activities associated with the receipt of reports of releases are review of the information submitted, entry of this information into a database tracking all releases, and, if necessary, transmittal of the information to the respective emergency response authorities.

Agency activities associated with requirements for generators' tank systems include the following:

- Review and evaluate information on equivalent containment devices;
- Evaluate information submitted for exemption from the 24-hour leak detection requirement; and
- Evaluate information submitted for variances from secondary containment requirements, including no-free liquids demonstrations.

In addition, the Agency must perform the following activities for generators' tank systems:

- Evaluate information submitted for exemption from 24-hour waste removal requirement;
- Review existing tank integrity assessments;
- Review new tank design and installation assessments;
- Review release notification reports;
- Review major repair certifications; and
- Review requests for accumulation period extensions.

Agency activities associated with requirements for generators' drip pads include the following:

- Review plans for upgrading drip pads;
- Review and evaluate drawings and certifications of drip pads;
- Evaluate notices of releases from drip pads; and
- Review repairs conducted to drip pads.

Agency activities associated with requirements for generators' containment buildings include the following:

- Review and evaluate notifications of releases of hazardous waste; and
- Review notices of repairs to containment buildings.

Some of the records and certifications required under this section are not formally submitted to EPA, but must be kept on file at the facility and made available to EPA upon request. On others, the regulations are not explicit about whether a demonstration must be submitted to EPA; this ICR generally assumes that LQGs submit the demonstrations anyway.

AIR EMISSION STANDARDS REQUIREMENTS (LQGs)

(1) Process Vents

There are no Agency activities associated with the requirements for generators with process vents. Although EPA will examine monitoring documentation, control device documentation, waste determination documentation, and information required in the operating record during periodic inspections, these activities are a part of EPA's overall compliance and enforcement program. Therefore, the cost associated with these activities is not attributable to Subpart AA.

(2) Equipment Leaks

Agency activities associated with the requirements for generators with equipment subject to Subpart BB include:

- Reviewing notifications to implement the alternate valve standard specified in §265.1061(a));
- Reviewing notifications to discontinue implementing the alternate valve specified in §265.1061(a)); and
- Reviewing notifications to implement the alternate valve standard specified in §§265.1062(b)(2) or (b)(3)).

PRE-TRANSPORT REQUIREMENTS (SQGs)

The Agency activities associated with SQG pre-transport requirements include reviewing requests for extensions of the accumulation period under §262.34(e). No other information is required to be submitted to EPA (SQG notification requirements include contacting the National Response Center, operated by the Coast Guard).

RECORDKEEPING AND REPORTING

Agency activities associated with the recordkeeping and reporting requirements are the on-site review of the documents maintained at the facility, and the review of submitted information and the entry of this information into a database.

EXPORT REQUIREMENTS

Agency activities associated with the receipt of notifications and renotifications of intent to export hazardous waste are to review to this information, and to submit, in conjunction with the Department of State, a notification to the receiving country and any transit countries. Upon the consent (or refusal) of the receiving countries to the receipt of the hazardous waste, the Agency will forward to the primary exporter an acknowledgment of consent (or a written notification of the objection). Other Agency activities associated with the export of hazardous waste are the receipt of annual reports. The Agency will review these documents and enter them into a database. During compliance inspections, the Agency will also review records kept on-site.

4(b) COLLECTION METHODOLOGY AND MANAGEMENT

In collecting and analyzing the information required under the generator requirements, EPA uses state-of-the-art electronic equipment such as personal computers and applicable database software, when appropriate.

4(c) SMALL ENTITY FLEXIBILITY

When promulgating the regulations covered under this ICR, EPA considered the effect of these regulations on small businesses. EPA found, however, that most small businesses do not generate hazardous waste and, therefore, are not significantly affected by the generator standards. EPA has been directed by Congress to promulgate standards to protect public health and the environment. In certain cases, such as the annual report requirements for primary exporters of hazardous waste, EPA has limited the informational requirements for small generators. These facilities do not have to include a description of efforts taken to reduce waste volume or toxicity, or descriptions of any variation in the volume and toxicity of wastes relative to previous years. Certain categories of small entities are exempt from the information collection requirements described herein. Others are subject to reduced requirements. The training requirements do not apply to small quantity generators. Nor are they subject to the contingency plan and emergency procedure requirements. Finally, such generators are subject to reduced tank standards under §265.201.

4(d) COLLECTION SCHEDULE

PRE-TRANSPORT REQUIREMENTS (FOR BOTH LQGs AND SQGs)

The reporting requirements outlined in the regulations will vary according to individual facility circumstances. Because personnel records are maintained on-site by LQGs, a discussion of a collection schedule is not relevant.

There is no collection schedule for generators reporting releases of hazardous waste into the environment, as facilities only report on these occasions. The emergency coordinator must immediately notify the appropriate authorities of an imminent or actual emergency situation. An LQG must submit a written report of any incident that requires the implementation of the contingency plan within 15 days of its occurrence. Since generators are not required to submit their contingency plans to EPA, discussion of a collection schedule for these facilities is not applicable.

Records of tank system assessments, statements on design and installation, and records of annual leak tests and inspections are kept by the LQGs. Therefore, a discussion of a collection schedule is not applicable. The time frame for submitting demonstrations provided under this section is dependent upon the desire of LQGs to submit such demonstrations. However, the regulations do specify time frames for submissions related to certain situations. LQGs must submit release notification reports within 30 days of detecting a release. In addition, the certification of major repairs (required under §265.196(f)) must be submitted within seven days of returning the repaired tank system to use. With regard to drip pads, plans for upgrading drip pads must be prepared 2 years before completion of such repairs, pad assessments must be recertified annually, records of releases must be documented upon detection and notice provided to EPA within 24 hours (written notice in within 10 days), and notice of repairs provided upon completion of such repairs. As for containment buildings, certification that the building meets design requirements is required within 60 days of initiating operation, records of releases must be filed upon detection and notice to EPA provided within 7 days (written notice within 14 days). In addition, monitoring data must be placed in the record every 7 days.

There is no collection schedule for generators requesting extensions from the Regional Administrator of the accumulation period, as these requests presume unforeseen circumstances.

AIR EMISSION STANDARDS REQUIREMENTS (LQGs)

The regulations at 40 CFR Part 265, Subparts AA and BB for generators do not specify time frames for submittals, and a discussion of a schedule regarding these requirements is not applicable.

RECORDKEEPING AND REPORTING

As the recordkeeping regulations in §262.40 do not require the transmittal of any information, a discussion of a schedule regarding this requirement is not applicable. Additionally, as §262.43 allows the Administrator to require additional information of generators on an irregular basis, a discussion of a collection schedule is not applicable.

EXPORT REQUIREMENTS

Generators meeting the definition of primary exporters should notify the EPA 60 days before the initial shipment of waste is scheduled to leave the United States (§262.53). The notifications of intent to export are collected as necessitated by generator activities. EPA has limited the burden of collection by allowing one notification to cover activities extending over a twelve-month period, unless certain conditions are altered.

The collection schedule for export activity annual reports requires their submittal no later than March 1 of the following year (§262.56). The report must include information regarding the primary exporter, transporter, and consignee, as well as the volume and characteristics of the waste. The report must also include a description of any variation in the volume and toxicity of wastes relative to previous years (not applicable to generators of more than 100 kg but less than 1000 kg of hazardous waste in a calendar month or to those already submitting information in the biennial report), and a signed certification. The recordkeeping regulations in §262.57 do not require the transmittal of any information; a discussion of a schedule regarding this requirement is not applicable.

5. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) NONDUPLICATION

Most of the information required by the regulations covered by this ICR are not available from any source but the respondents. In certain occasions, such as the notification of intent to export hazardous waste, EPA allows the primary exporter to submit one notice that covers activities over a period of twelve months.

5(b) CONSULTATIONS

The regulations covered by this ICR were promulgated using proper rulemaking procedures. EPA made every effort to consult with the general public, State and industry officials, and appropriate Federal agencies. EPA held public hearings and received substantial comments. As a result, EPA has made a number of modifications to its original regulations. The Agency has also contacted selected hazardous waste generators and relevant trade associations regarding the data and assumptions used in renewing this ICR.

5(c) EFFECTS OF LESS FREQUENT COLLECTION

EPA has carefully considered the burden imposed upon the regulated community by the generator standards. EPA is confident that those activities required of respondents are necessary, and

to the extent possible, have attempted to minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the regulations are not met, neither the generators nor EPA can ensure that hazardous wastes are being properly managed, and do not pose a serious threat to human health and the environment.

5(d) GENERAL GUIDELINES

Requirements and justification for reporting information to EPA more often than quarterly have already been discussed under Section 4(d). Collection activities that must be prepared in less than 30 days are also discussed in Section 4(d). The following section identifies requirements for retaining records for more than three years and provides a justification for these requirements.

PRE-TRANSPORT REQUIREMENTS (FOR BOTH LQGs AND SQGs)

Training records on current employees must be kept at the generator site until closure of the site. Records of former employees must be held for at least three years after the date the employee left the facility. Keeping these records will provide documentation of preparations made for handling hazardous waste, and allow the LQG to keep up to date on employee training.

There are situations in which certain collections covered in this ICR may have to be submitted more often than quarterly. For example, §265.196(b) requires LQGs at which there has been a spill to, within 24 hours, remove enough waste from the system to prevent further release and allow for inspection and repair of the tank. LQGs that can demonstrate that they cannot remove the waste within 24 hours may request an exemption from EPA. If there were to be more than one of these occurrences in one quarter, the respondent would still be under the obligation to request an exemption. EPA believes that situations such as these will be so rare as to make the issue almost moot. If these situations occur more frequently, they may signal a generator site that is unsafe.

AIR EMISSION STANDARDS REQUIREMENTS (LQGs)

There are no regulations at 40 CFR Part 265, Subparts AA and BB requiring generators to retain records for more than three years.

RECORDKEEPING, REPORTING, AND EXPORT REQUIREMENTS

Recordkeeping requirements for all generators and primary exporters require these facilities to retain records of any test results, waste analyses, or other determinations, notifications of intent to export, acknowledgments of consent, confirmations of delivery, and export activity annual reports for at least three years. EPA believes that hazardous waste shipments cannot be properly managed unless EPA can track the treatment and disposal of those shipments. In tracking shipments, EPA believes it may be necessary at times to refer to shipments made at least three years previously for certain circumstances, such as unresolved enforcement actions.

5(e) CONFIDENTIALITY

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which define EPA's general policy on the public disclosure of information, contain provisions for confidentiality.

5(f) SENSITIVE QUESTIONS

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

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) ESTIMATING RESPONDENT BURDEN

This ICR is a comprehensive presentation of all of the information collection activities required for generator standards and covers Fiscal Years 1998 - 2000.

Exhibit 1 summarizes the universe of generators. EPA estimated respondent burden hours associated with all of the requirements covered in this ICR in Exhibits 2, 3, 4, 5, 6, and 7: Exhibit 2 addresses both LQG and SQG respondent burden for reading the regulations; Exhibit 3 addresses LQG pre-transport requirements; Exhibit 4 addresses LQG air emission standards requirements; Exhibit 5 addresses SQG pre-transport requirements; Exhibit 6 addresses certain recordkeeping and reporting requirements for all generators; and Exhibit 7 addresses specific export requirements for all generators. All exhibits include the number of hours required to conduct the information collection activity and the cost associated with each requirement. The following subsections present burden information related to activities required by these generator standards.

LARGE QUANTITY GENERATOR AND SMALL QUANTITY GENERATOR REQUIREMENTS

(1) Reading the Regulations

Based on the 1993 Biennial Report System (BRS), EPA estimates that there are approximately 24,362 LQGs. A number of these LQGs (2,584), however, are also hazardous waste treatment, storage, and disposal facilities. These facilities are covered by other ICRs and were deleted from facilities covered in this document, yielding an estimated 21,778 LQGs (24,362 - 2,584 = 21,778). Using data from the RCRIS database for May 1997, EPA estimates that there are approximately 225,882 SQGs. A number of the LQGs (about 846) and SQGs (about 1,882) also are government-owned and government-operated facilities and, therefore, not addressed in this ICR. Subsequently, these government-owned and government-operated generators were deleted from the universe covered in this ICR, yielding an estimated 20,932 LQGs (21,778 - 846 = 20,932) and 224,000 SQGs (225,882 - 1,882 = 224,000). As shown in Exhibit 1, 20,932 LQGs and 224,000 SQGs comprise the respondent universe. EPA expects that each LQG will average 0.45 hours to read the generator standards regulations once a year, while each SQG will average 0.30 hours per year.

EXHIBIT 1
UNIVERSE OF GENERATORS

WASTE HANDLER TYPE	NUMBER OF WASTE HANDLERS
Large Quantity Generator	20,932
Small Quantity Generator	224,000
Total	244,932

LARGE QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Personnel Training

In §262.34(a)(4), EPA requires all LQGs to comply with the personnel training requirements in §265.16(d). Section 265.16(d) and (e) require that LQGs maintain copies of personnel training

documents and records at their facilities. Because the majority of LQGs are currently in operation, EPA estimates that only a small percentage of LQGs, about three percent or 628 LQGs each year, are new and will be required to collect information regarding their employees' training experiences.

(2) Contingency Planning and Emergency Procedures

This ICR assumes that LQGs have already prepared contingency plans. Therefore, only new LQGs will be required to document whether State or local authorities decline to enter into an agreement to become familiar with the LQG's facility and its wastes, and to prepare and maintain a contingency plan. EPA estimates LQGs will need to make copies of and send the plans to three local authorities, on average. Amendments to contingency plans of LQGs must also be made when appropriate. EPA estimates that 628 new LQGs will prepare original contingency plans annually, and that an equal number will amend their contingency plan annually, during the period covered by this ICR.

Based on program experience, the Agency estimates that only one tenth of one percent of all LQGs will have emergency incidents requiring implementation of the contingency plan. Therefore, approximately 21 LQGs will be required to prepare emergency reports each year. LQGs are also required to notify the Regional Administrator that the facility is in compliance with §265.56(h) before resuming operation in the affected areas.

(3) Tank Systems

In §262.34(a)(1), EPA requires all LQGs that accumulate hazardous waste in tanks for 90 days or less to comply with Subpart J of Part 265. Of all 20,932 LQGs, EPA estimates that 75 percent use containers to accumulate hazardous waste, and the remaining 25 percent use tank systems. The respondent universe for LQGs operating tank systems is 5,233 LQGs.

Depending on how the tank owner desires to comply with the regulations, he or she may need to submit to one or more of the following: a no-free-liquids demonstration (§265.190(a)), existing tank system assessments (§265.191), an equivalent containment exemption (§265.193(d)), a variance from secondary containment requirements (§265.193(g)), or annual leak tests and inspections (§265.193(i)). Most LQGs seeking to operate under these conditions have already made the required demonstrations. In general, only LQGs recently subjected to hazardous waste regulations will need to submit these demonstrations. EPA estimates that approximately three percent or 157 respondents are subject to most of the requirements and that one percent or 52 LQGs are subject to some of the requirements.

In addition, in certain circumstances (e.g., a new tank, a hazardous waste release, or a repair to a tank), LQGs must submit one or more of the following: new tank system assessments and certifications (§265.192); an exemption from the 24-hour leak detection requirement (§265.193(e)(3)(iii)); an exemption from the 24-hour waste removal requirement (§265.196)(b)); or release notifications and reports, and major repair certifications (§265.196(d) and (f)). As these are ongoing informational requirements, EPA estimates that:

- Three percent or 157 LQGs will need to make new tank system assessments and certifications. Of that number, approximately five facilities will petition for an exemption from the 24-hour leak detection requirement; and

- One percent or 52 LQGs will report a release or a major repair certification. In addition, approximately five facilities will need to petition for an exemption of the 24-hour waste removal requirement.

O&M costs for generators using tank systems include contractor costs for:

- Performing a free liquids absence demonstration (265.190(a));
- Performing leak test and obtaining a certification from an independent, qualified, registered, professional engineer;
- One-time fees associated with an independent, qualified, registered, professional engineer attesting that the system has sufficient structural integrity and is acceptable for storing and treating of hazardous waste;
- Conducting a demonstration to gather information for the variance; and
- One-time fees associated with the services of a registered, professional engineer to prepare the certification for major repairs.

(4) Drip Pads

Under §262.34(a)(iii), EPA authorizes LQGs to store hazardous waste on drip pads for 90 days or less pursuant to Part 265, Subpart W. Part 265, Subpart W is primarily applicable to those facilities conducting wood preserving operations. Recent data indicates that there are approximately 605 wood preserving operations in the U.S. (Standard Industrial Classification Statistics, Dun's Marketing Services, 4/97). Based on the ratio of LQGs to SQGs, EPA estimates that approximately 8.5 percent (52) of these operators are LQGs that may use the drip pad provisions to accumulate hazardous waste on-site for a limited period. EPA estimates that three percent of these facilities (2) will prepare a contingency plan for incidental drippage, and that 15 percent (8) will have a condition contributing to or actual release of hazardous waste and be subject to the recordkeeping, notification, repair and certification requirements.

O&M costs for generators using drip pads include contractor costs for:

- O&M costs for this activity include one-time contractor fees associated with certifying liners.
- Contractor fees for preparing a written assessment of drip pad integrity by a registered engineer, including fees for drawings and obtaining certification by an independent certified engineer;
- Contractor fees associated with obtaining a written assessment and certification of drip pad design by a registered engineer;
- Contractor fees associated with obtaining a written assessment by a registered engineer, as well as an annual evaluation and certification, that repairs to drip pads satisfy applicable standards; and
- Obtaining liner certification by independent, registered engineer.

(5) Containment Buildings

Under §262.34(a)(iv), EPA authorizes LQGs to store hazardous waste in containment buildings for 90 days or less pursuant to Part 265, Subpart DD. Part 265, Subpart DD is potentially applicable to all large quantity hazardous waste generators. EPA estimates that approximately 10 percent of the LQGs addressed by this ICR (2,093) use containment buildings. EPA estimates that three percent of these facilities (63) will be subject to the recordkeeping and notice requirements associated with hazardous waste releases, and that 25 percent of these facilities (523) will require documentation for areas lacking secondary containment.

O&M costs for generators using containment buildings cover contractor costs associated with obtaining certification of the design of the containment building by an independent, registered engineer.

(6) Requests for Extensions of the Accumulation Period

EPA promulgated regulations in §262.34(b) allowing LQGs to request from the Regional Administrator extensions (up to 30 days) of the accumulation period limit. EPA estimates that only one tenth of one percent of all LQGs, approximately 21 LQGs, will request this extension each year.

LARGE QUANTITY GENERATOR AIR EMISSION STANDARDS REQUIREMENTS

(1) Process Vents

EPA estimates that 849 generators are subject to Subpart AA, based on the number of LQGs in the BRS reporting use of fractionation/distillation, thin-film evaporation, solvent extraction, or air or steam stripping.

(a) Control Device Operation Documentation

This ICR assumes that generators with process vents have already prepared documentation describing the operation of control devices and identifying process parameters that indicate proper operation and maintenance of those control devices. EPA estimates that all generators will reassess, file, and maintain control device operation documentation, and that 10 percent (approximately 85 units) will modify it annually.

(b) Waste Determination

Based on previous experience, EPA estimates that 10 percent of generators with process vents will use knowledge of the waste to determine that its total organic concentration is less than 10 ppmw. EPA further estimates that knowledge-based waste determinations will be made initially and annually thereafter for four waste streams with process vents. Therefore, 85 generators will be required to prepare documentation of waste determinations four times per year.

O&M costs for this activity include one-time contractor fees associated with lab fees and preparing documentation for the determination.

(c) Unit Operating Record

All generators subject to Subpart AA are required to maintain a unit operating record. However, the contents of the record will vary according to site-specific circumstances. A discussion of the respondent burden for each data item is presented below:

(i) Implementation schedule

This ICR assumes that generators with process vents have already prepared an implementation schedule. EPA estimates that all generators (849 units) will reassess, file, and maintain their implementation schedule, and 10 percent (approximately 85 units) will modify it annually.

(ii) Up-to-date documentation of compliance with §264.1032

This ICR assumes that generators with process vents have already prepared documentation of compliance with §265.1032. EPA estimates that all generators (849 units) will reassess, file, and

maintain §265.1032 compliance documentation, and 10 percent (approximately 85 units) will modify it annually.

(iii) Performance Test Plan

This ICR assumes that generators with process vents that are using test data to determine the organic removal efficiency or total organic compound concentration achieved by the control device have already prepared a performance test plan. EPA estimates that all generators (849 units) will reassess, file, and maintain their performance test plan, and 10 percent (approximately 85 units) will modify it annually.

(iv) Documentation of compliance with §264.1033

This ICR assumes that generators with process vents have already prepared documentation of compliance with §265.1033. EPA estimates that all generators (849 units) will reassess, file, and maintain §265.1033 compliance documentation, and 10 percent (approximately 85 units) will modify it annually.

(v) Design, monitoring, operation, and inspection information

This ICR assumes that generators with process vents have already prepared design, monitoring, and inspection information for each closed-vent system and control device. EPA estimates that all generators (849 units) will reassess, file, and maintain control device operation documentation, and that 10 percent (approximately 85 units) will modify it annually.

(vi) Determination of Applicability to Subpart AA

This ICR assumes that generators have already documented information determining applicability of Subpart AA to their unit process vents. EPA estimates that all generators (849 units) will reassess, file, and maintain this documentation, and that 10 percent (approximately 85 units) will modify it annually.

(2) Equipment Leaks

EPA estimates that 3,339 generators are subject to Subpart BB, based on the number of LQGs in BRS with on-site processes. EPA believes that generators that operate on-site processes would be those most likely to have pumps, valves, and other types of equipment that may be subject to Subpart BB standards.

(a) Notification to implement the alternate valve standard specified in §265.1061(a)

Based on previous experience, EPA estimates that 20 percent of generators subject to Subpart BB will decide to implement the alternative standard specified in §265.1061(a) each year. Therefore, 668 units will be required to prepare notification to implement the alternate valve standard specified in §265.1061(a).

(b) Notification to discontinue implementing the alternative valve standard specified in §265.1061(a)

Based on previous experience, EPA estimates that 668 generators subject to Subpart BB have implemented the alternative standard for valves specified in §265.1061(a) and one percent of these generators will discontinue using the alternative standard each year. Therefore, seven generators will be

required to prepare notification to discontinue implementing the alternate valve standard specified in §265.1061(a).

(c) Notification to implement the alternative valve standard specified in §265.1062(b)(2), or (b)(3).

Based on previous experience, EPA estimates that five percent of generators subject to Subpart BB will decide to implement the alternative standard specified in §265.1062(b)(2) or (b)(3) each year. Therefore, 167 generators will be required to prepare notification to implement the alternate valve standard specified in §265.1062(b)(2) or (b)(3).

(d) Non-Hazardous Waste Documentation

Based on previous experience, EPA estimates that 10 percent of generators with equipment subject to Subpart BB will use knowledge to determine that each piece of equipment does or does not contain hazardous waste with organic concentration that equals or exceeds 10 percent waste. EPA estimates that generators will make these determinations four times per year. Therefore, approximately 334 units will be required to prepare non-hazardous waste documentation four times per year.

O&M costs for this activity include one-time contractor fees associated with analyzing waste.

(5) Unit Operating Record

All generators subject to Subpart BB are required to maintain a unit operating record. The contents of the operating record will vary according to site-specific circumstances. A discussion of the respondent burden for each data item is presented below:

(i) Equipment Record

This ICR assumes that generators with equipment subject to Subpart BB have already prepared an equipment record. EPA estimates that all generators (3,339 units) will reassess, file, and maintain their equipment record, and 10 percent (approximately 334 units) will modify it annually.

(ii) Implementation Schedule

This ICR assumes that generators with equipment subject to Subpart BB have already prepared an implementation schedule. EPA estimates that all generators (3,339 units) will reassess, file, and maintain their implementation schedule, and 10 percent (approximately 334 units) will modify it annually.

(iii) Performance Test Plan

This ICR assumes that generators using test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device have already prepared a performance test plan. EPA estimates that all generators using test data to demonstrate the organic removal efficiency or total organic compound concentration achieved by the control device (approximately 3,339 units) will reassess, file, and maintain their performance test plan, and 10 percent (approximately 334 units) will modify it annually.

(iv) Documentation of Compliance with §264.1060

This ICR assumes that generators subject to Subpart BB have already prepared a documentation of compliance. EPA estimates that all generators (3,339 units) will reassess, file, and

maintain their §265.1060 compliance documentation, and 10 percent (approximately 334 units) will modify it annually.

(v) Leak Inspection Log

EPA estimates that all generators subject to Subpart BB (3,339 units) will have equipment leaks during the period covered by this ICR. Therefore, 3,339 will be required to prepare and maintain a leak inspection log. All generators will be required to reassess and modify their inspection log.

(vi) Design, monitoring, operation, and inspection information

This ICR assumes that generators with equipment subject to Subpart BB have already prepared design, monitoring, and inspection information for each closed-vent system and control device. EPA estimates that all generators with closed-vent systems and control devices (approximately 3,339 units) will reassess, file, and maintain control device operation documentation, and 10 percent (approximately 334 units) will modify it annually.

(vii) Equipment Log

This ICR assumes that generators with equipment subject to Subpart BB have already prepared an equipment log. EPA estimates that all generators (3,339 units) will reassess, file, and maintain their equipment log, and 10 percent (approximately 334 units) will modify it annually.

(viii) Valve Log for Valves Subject to §265.1057(g) and (h)

This ICR assumes that generators with valves subject to §265.1057(g) and (h) have already prepared a valve log. EPA estimates that all generators with valves subject to §265.1057(g) and (h) (approximately 835 units) will reassess, file, and maintain their valve log, and 10 percent (approximately 84 units) will modify it annually.

(ix) Valve Log for Valves Subject to §265.1062

This ICR assumes that generators with valves subject to §265.1062 have already prepared a valve log. EPA estimates that all generators with valves subject to §265.1062 (approximately 167 units) will reassess, file, and maintain their valve log, and 10 percent (approximately 17 units) will modify it annually.

(x) Criteria Log

This ICR assumes that generators subject to Subpart BB have already prepared a criteria log documenting information required in §§265.1052(d)(5)(ii) and 265.1053(e)(2) for pumps in light liquid service and compressors. EPA further estimates that units entering, from interim status, the permitted equipment leak universe. EPA estimates that all generators with equipment subject to §§265.1052(d)(5)(ii) and 265.1053(e)(2) (3,339 units) will reassess, file, and maintain their criteria log, and 10 percent (approximately 334 units) will modify it annually.

(xi) Exemption Log

This ICR assumes that generators potentially subject to Subpart BB have already documented information determining applicability of Subpart BB to their unit's equipment. EPA estimates that all generators (3,339 units) will reassess, file, and maintain this documentation, and 10 percent (approximately 334 units) will modify it annually.

SMALL QUANTITY GENERATOR PRE-TRANSPORT REQUIREMENTS

(1) Emergency Procedures

EPA promulgated regulations in §262.34 requiring SQGs to immediately notify the National Response Center in the event of a fire, explosion, or other release which could threaten human health outside the facility, or when SQGs have knowledge that a spill has reached surface water. EPA estimates that one tenth of one percent of all respondents, or 224 SQGs, will report such an event each year.

(2) Requests for Extensions of the Accumulation Period

EPA promulgated regulations in §262.34(f) allowing SQGs to request from the Regional Administrator extensions (up to 30 days) of the accumulation period limit. EPA estimates that one tenth of one percent of all respondents, approximately 224 SQGs, will request an extension each year.

RECORDKEEPING AND REPORTING REQUIREMENTS

All generators (both LQGs and SQGs) must comply with the recordkeeping and reporting requirements detailed in §§262.40 and .43. EPA estimates that 20 percent of the 20,932 LQGs and 224,000 SQGs will execute the recordkeeping requirements (keep records of any test results, waste analyses, or other determinations for at least three years). EPA estimates that one tenth of one percent of all generators, approximately 245, will also be required to submit certain additional information (§262.43). Based on the ratio of LQGs to SQGs, EPA estimates that approximately 21 are LQGs and 224 are SQGs.

EXPORT REQUIREMENTS

All generators (both LQGs and SQGs) must also comply with the export requirements detailed in §§262.53, and .55 - .57. From past experience, EPA estimates that 885 generators will export hazardous waste each year during the period covered by this ICR, and will be required to notify EPA of their intention to export hazardous waste, file an annual report with the Administrator summarizing the types, quantities, frequencies, and ultimate destination of all hazardous wastes exported during the previous years, and keep copies of relevant documents for a period of three years. Because SQGs are not required to submit waste volume and toxicity reduction information in their annual reports, EPA accordingly differentiated LQG and SQG annual report burden hour estimates in Exhibit 4. EPA estimates that 95 percent, or 841, of the 885 exporters will be comprised of LQGs and five percent or 44, of the 885 exporters will be comprised of SQGs.

6(b) ESTIMATING ANNUAL RESPONDENT COSTS

Exhibits 2 through 7 estimate the costs to generators based on the cost of labor and operation and maintenance (O&M). For purposes of this analysis, EPA estimates an average hourly respondent cost of $93.48 for legal staff, $73.32 for managerial staff, $47.99 for technical staff, and $25.10 for clerical staff. To derive these estimates, EPA consulted industry officials regarding their salary structure and overhead rates. These figures are representative of the typical costs including both direct and indirect costs.

In the following paragraphs, EPA estimates capital costs associated with the information requirements covered by this ICR. Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. For this ICR, the only required capital is file cabinets for maintaining reports. As shown in Exhibit 8, EPA estimates the

EXHIBIT 2:
ANNUAL RESPONDENT BURDEN/COST ESTIMATES
READING THE REGULATIONS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Read the regulations											
LQGs	20,932	0.05	0.10	0.30	0.00	$0.00	$0.00	$0.00	9,419	$26.40	$552,687
SQGs	224,000	0.05	0.05	0.20	0.00	$0.00	$0.00	$0.00	67,200	$17.94	$4,018,267
TOTAL	varies	0.05	varies	varies	0.00	$0.00	$0.00	$0.00	76,619	varies	$4,570,954

EXHIBIT 3:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Large Quantity Generator Pre-Transport Requirements											
Personnel Training (265.16(d))											
Collect job-related data	628	0.00	0.00	0.00	0.50	$0.00	$0.00	$0.00	314	$12.55	$7,881
Maintain information at facility	628	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	63	$2.51	$1,576
Subtotal	628	0.00	0.00	0.00	varies	$0.00	$0.00	$0.00	377	varies	$9,457
Contingency Plan and Emergency Procedures											
Contingency Plan (265.37(b), 265.51, 265.52, and											
Collect data required in contingency plan	628	0.00	0.00	1.00	1.00	$0.00	$0.00	$0.00	1,256	$73.09	$45,902
Document whether authorities decline arrangement	628	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	63	$2.51	$1,576
Write contingency plan	628	0.00	0.00	6.00	2.00	$0.00	$0.00	$0.00	5,024	$338.15	$212,360
Maintain contingency plan	628	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	63	$2.51	$1,576
Submit contingency plan to relevant emergency	628	0.00	0.00	0.00	0.16	$1.05	$3.00	$0.00	100	$8.07	$5,065
Amend contingency plan when appropriate	628	0.00	0.00	1.00	1.00	$0.00	$0.10	$0.00	1,256	$73.19	$45,964
Emergency Procedures (265.56(d))											
Collect information required in emergency report	21	0.00	0.00	1.00	1.00	$0.00	$0.00	$0.00	42	$73.09	$1,535
Write emergency report	21	0.17	0.00	0.50	0.00	$0.00	$0.00	$0.00	14	$39.89	$838
Call OSC or notify NRC; notify local authorities if	21	0.00	0.10	0.90	0.00	$0.00	$0.00	$0.00	21	$50.53	$1,061
Notification of Compliance (265.56(i))											
Collect information required in emergency notification	21	0.00	0.00	0.50	0.50	$0.00	$0.00	$0.00	21	$36.55	$767
Write emergency notification report	21	0.17	0.00	0.25	0.00	$0.00	$0.00	$0.00	9	$27.89	$586
Submit report to Regional Administrator	21	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	3	$4.37	$92
Compile information demonstrating compliance	21	0.00	0.00	0.50	0.00	$0.00	$0.00	$0.00	11	$24.00	$504
Prepare letter notifying Regional Administrator of	21	0.16	0.00	0.25	0.00	$0.00	$0.00	$0.00	9	$26.96	$566
Submit notification	21	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	3	$4.37	$92
Subtotal	varies	0.00	varies	varies	varies	$674.10	$1,946.80	$0.00	7,895	varies	$318,484
Tank System Requirements											
Free Liquids Absence Demonstration (265.190(a))											
Perform test as required	52	0.00	0.00	0.00	0.00	$0.00	$0.00	$55.00	0	$55.00	$2,860
Place test results in record	52	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	5	$2.51	$131
Sufficiency Demonstration (265.191)											
Perform leak test	52	0.00	0.00	0.00	0.00	$0.00	$0.00	$1,100.00	0	$1,100.00	$57,200
Obtain independent engineer's assessment of tank	52	0.00	0.00	1.00	0.00	$0.00	$0.00	$660.00	52	$707.99	$36,816
File assessment at facility	52	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	5	$2.51	$131
Tank System Assessments (265.192)											
Obtain written assessment and have it reviewed &	157	0.00	0.00	1.00	0.00	$0.00	$0.00	$1,430.00	157	$1,477.99	$232,045
Obtain written statements from those who certified design of tank system and supervised installation	157	0.00	0.00	1.00	0.00	$0.00	$0.00	$770.00	157	$817.99	$128,425
File written statements at facility	157	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	16	$2.51	$394

EXHIBIT 3:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Secondary Containment (265.193)											
Equivalent Containment Devices (265.193(d))											
Gather design and other information	52	0.00	0.00	2.00	2.00	$0.00	$0.00	$0.00	208	$146.18	$7,602
Submit information to Regional Administrator	52	0.00	0.10	0.00	0.16	$0.35	$0.00	$0.00	14	$11.70	$608
Exemption from 24-Hour Leak Detection Requirement (265.193(e)(3)(iii))											
Compile evidence that leak detection system cannot detect failure or contamination within 24 hours	5	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	20	$191.97	$960
Submit evidence to Regional Administrator	5	0.00	0.10	0.00	0.16	$0.35	$0.00	$0.00	1	$11.70	$58
Variance from Secondary Containment Requirements (265.193(g))											
Prepare notification of intent to conduct demonstration	5	0.00	0.00	1.00	0.00	$0.00	$0.00	$0.00	5	$47.99	$240
Submit notification to Regional Administrator	5	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	1	$4.37	$22
Complete demonstration	5	0.00	0.00	1.25	0.00	$0.00	$0.00	$990.00	6	$1,049.99	$5,250
Submit completed demonstration to Regional	5	0.00	0.10	0.00	0.16	$0.35	$0.00	$0.00	1	$11.70	$58
Annual Leak Tests and Inspections (265.193(i))											
Conduct leak test (non-enterable underground tanks	157	0.00	0.00	12.00	0.00	$0.00	$0.00	$0.00	1,884	$575.91	$90,418
Conduct annual leak test (all other tanks)	157	0.00	0.00	16.00	0.00	$0.00	$0.00	$0.00	2,512	$767.88	$120,557
Record inspection and/or test results	157	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	314	$95.98	$15,070
Maintain record of results on file at facility	157	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	16	$2.51	$394
Exemptions from 24-Hour Waste Removal Requirement (265.196(b))											
Compile evidence of inability to remove waste timely	5	0.00	0.00	2.00	1.00	$0.00	$0.00	$0.00	15	$121.08	$605
Submit evidence to Regional Administrator	5	0.00	0.10	0.00	0.16	$0.35	$0.00	$0.00	1	$11.70	$58
Release Notifications and Reports (265.196(d))											
Notify Regional Administrator of release	52	0.00	0.10	0.40	0.00	$0.00	$0.00	$0.00	26	$26.53	$1,380
Prepare detailed report for Regional Administrator	52	0.17	0.10	3.00	1.90	$0.00	$0.00	$0.00	269	$214.89	$11,174
Submit report to Regional Administrator	52	0.00	0.10	0.00	0.16	$0.35	$0.00	$0.00	14	$11.70	$608
Major Repair Certifications (265.196(f))											
Obtain certification	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$660.00	13	$672.00	$34,944
Submit certification to Regional Administrator	52	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	8	$4.37	$227
Subtotal	varies	0.00	varies	varies	varies	$61.60	$0.00	$479,050.00	5,720	varies	$748,233
Drip Pad Requirements (262.34(a)(1)(iii))											
Contingency Plan (265.440(c)(1))											
Write contingency plan	2	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	4	$95.98	$192
Document clean-up of incidental drippage	2	0.00	0.00	0.25	0.25	$0.00	$0.00	$0.00	1	$18.27	$37
Retain documentation for 3 years	2	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	0	$2.51	$5
Assess adequacy of drip pads (265.441(a)(b)(c))											
Prepare and maintain assessment of pad integrity	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$220.00	13	$232.00	$12,064
Prepare plan for upgrading pad	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$550.00	13	$562.00	$29,224
Prepare drawings of pad and obtain independent	52	0.00	0.00	0.25	0.00	$0.00	$0.20	$770.00	13	$782.20	$40,674

EXHIBIT 3:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/page	@ $110.00/hr			
Design and Operating Requirements (265.443)											
Prepare an assessment of drip pad and obtain	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$440.00	13	$452.00	$23,504
Place a record of any condition contributing to or release of hazardous waste from drip pad in	8	0.00	0.00	0.25	0.00	$0.00	$0.00	$0.00	2	$12.00	$96
Notify Regional Administrator of release/provide	8	0.17	0.10	0.40	0.00	$0.00	$0.00	$0.00	5	$42.42	$339
Notify Regional Adminstrator of completion of repairs	8	0.00	0.10	0.40	0.00	$0.00	$0.00	$0.00	4	$26.53	$212
Provide Regional Administrator independent that repairs satisfy applicable standards	8	0.00	0.00	0.25	0.00	$0.35	$0.10	$110.00	2	$122.45	$980
Prepare documentation of operating/waste handling	52	0.00	0.00	2.00	0.00	$0.00	$0.20	$0.00	104	$96.18	$5,002
Certification of liner (265.444(a))											
Obtain independent certification of liner	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$220.00	13	$232.00	$12,064
Place certification in operating log	52	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	5	$2.51	$131
Documentation of waste removal (262.34(a)(1)(iii))											
Prepare description of 90-day waste removal	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$0.00	13	$12.00	$624
Document each waste removal	52	0.00	0.00	0.25	0.00	$0.00	$0.00	$0.00	13	$12.00	$624
Subtotal	varies	0.00	varies	varies	varies	$2.80	$21.60	$115,280.00	219	varies	$125,771
Containment Building Requirements (262.34(a)(1)(iv))											
Design and Performance Documentation											
Obtain independent certification of building design	2,093	0.00	0.00	0.25	0.00	$0.00	$0.00	$220.00	523	$232.00	$485,572
Place certification in operating record	2,093	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	209	$2.51	$5,253
Maintain records of any release from containment	63	0.00	0.00	0.25	0.10	$0.00	$0.00	$0.00	22	$14.51	$914
Notify Regional administrator of any condition or actual release of hazardous waste and follow-up	63	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	126	$95.98	$6,047
Notify Regional Administrator of clean-up or repairs	63	0.17	0.10	0.40	0.10	$0.00	$0.00	$0.00	49	$44.93	$2,831
Record monitoring and leak detection data and place operating record at least every 7 days	2,093	0.00	0.00	0.00	10.00	$0.00	$0.00	$0.00	20,930	$250.99	$525,332
Documentation of Areas Lacking Secondary Containment (265.1101(d)											
Place in operating log description of procedures to integrity of areas lacking secondary containment	523	0.00	0.00	2.00	0.10	$0.00	$0.00	$0.00	1,098	$98.49	$51,513
Documentation of Procedures and Compliance (262.34(a)(1)(iv))											
Prepare procedures ensuring waste is stored no more than 90 days	2,093	0.00	0.00	1.00	0.10	$0.00	$0.00	$0.00	2,302	$50.50	$105,701
Prepare description of waste generation and waste management practices	2,093	0.00	0.00	1.50	0.10	$0.00	$0.00	$0.00	3,349	$74.50	$155,925
Document that 90-day storage procedures are	2,093	0.00	0.00	0.25	0.00	$0.00	$0.00	$0.00	523	$12.00	$25,112
Document that unit is emptied at least once every 90	2,093	0.00	0.00	1.00	0.40	$0.00	$0.00	$0.00	2,930	$58.03	$121,461
Subtotal	varies	0.00	varies	varies	varies	$0.00	$0.00	$460,460.00	32,062	varies	$1,485,662
Requests for Extensions of Accumulation Period											
Prepare and submit request to Regional Administrator	21	0.10	0.10	0.00	0.40	$0.35	$0.00	$0.00	13	$27.07	$568
Subtotal	21	0.00	0.10	0.00	0.40	$7.35	$0.00	$0.00	13	$27.07	$568
Subtotal for LQG Pre-Transport Requirements	varies	0.00	varies	varies	varies	$745.85	$1,968.40	$1,054,790.00	46,285	varies	$2,688,176

EXHIBIT 4:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/page	@ $110.00/hr			
Large Quantity Generator Air Emission Standards Requirements											
Process Vents											
Control Device Operation Documentation											
Reassess and file documentation	849	0.00	0.00	1.50	0.50	$0.00	$0.00	$0.00	1,698	$84.54	$71,773
Modify documentation	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Maintain documentation at the facility (265.1035)(e)(2)	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Waste Determination											
Gather information (initially and annually thereafter)	85	0.00	8.00	16.00	8.00	$0.00	$0.00	$4,840.00	2,720	$6,395.23	$543,595
Document information (initially and annually thereafter)	85	0.00	0.00	0.00	2.00	$0.00	$0.00	$0.00	170	$50.20	$4,267
Maintain documentation at the facility (initially and annually thereafter)	85	0.00	0.00	0.00	0.40	$0.00	$0.00	$0.00	34	$10.04	$853
Facility operating record: Implementation schedule											
Reassess implementation schedule	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain implementation schedule	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify implementation schedule	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Facility operating record: Up-to-date documentation of compliance (265.1032)											
Reassess up-to-date documentation of compliance	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain up-to-date documentation of	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify up-to-date documentation of compliance	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Facility operating record: Performance Test Plan											
Reassess performance test plan	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain performance test plan	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify performance test plan	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Facility operating record: Documentation of compliance (265.1033)											
Reasses up-to-date documentation	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain up-to-date documentation	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify up-to-date documentation	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Facility operating record: Design/monitoring/operation/inspection information											
Reassess information	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain information	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify information	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Facility operating record: Determination of applicability to Subpart AA											
Reassess determination	849	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,698	$95.98	$81,491
File and maintain determination	849	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	85	$2.51	$2,131
Modify determination	85	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	340	$191.97	$16,317
Subtotal	varies	0.00	varies	varies	varies	$0.00	$0.00	$411,400.00	17,784	varies	$1,238,572

EXHIBIT 4:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Equipment Leaks											
Notification to implement the alternative valve standard in (265.1061)(a)											
Prepare notification	668	0.00	0.25	1.00	0.25	$0.00	$0.00	$0.00	1,002	$72.60	$48,495
Submit notification to the Region	668	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	107	$4.37	$2,916
Notification to discontinue alternative valve standard in (265.1061)(a)											
Prepare notification	7	0.00	0.25	1.00	0.25	$0.00	$0.00	$0.00	11	$72.60	$508
Submit notification to the Region	7	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	1	$4.37	$31
Notification to implement alternative valve standard (265.1061)(b)(2) and (265.1062)(b)(3)											
Prepare notification	167	0.00	0.25	1.00	0.25	$0.00	$0.00	$0.00	251	$72.60	$12,124
Submit notification to the Region	167	0.00	0.00	0.00	0.16	$0.35	$0.00	$0.00	27	$4.37	$729
Non-hazardous waste documentation											
Gather production process, waste generation, and specification analysis (4 times annually)	334	0.00	0.00	0.00	0.00	$0.00	$0.00	$1,100.00	0	$1,100.00	$367,400
Document production process, waste generation and specification analysis (4 times annually)	334	0.00	0.00	16.00	0.00	$0.00	$0.00	$0.00	5,344	$767.88	$256,471
Maintain documentation at the facility (4 times	334	0.00	0.00	0.00	2.00	$0.00	$0.00	$0.00	668	$50.20	$16,766
Facility Operating Record (265.1064)(b): Equipment											
Reassess equipment record	3,339	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	6,678	$95.98	$320,493
File and maintain equipment record	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify equipment record	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Implementation schedule											
Reassess implementation schedule	3,339	0.00	0.00	1.00	0.00	$0.00	$0.00	$0.00	3,339	$47.99	$160,246
File and maintain schedule	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify implementation schedule	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Performance Test Plan											
Reassess performance test plan	3,339	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	13,356	$191.97	$640,985
File and maintain plan	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify performance test plan	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Documentation of compliance with (265.1060)											
Reassess up-to-date documentation	3,339	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	13,356	$191.97	$640,985
File and maintain up-to-date documentation	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify up-to-date documentation	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Leak inspection log											
Prepare a leak inspection log	3,339	0.00	0.00	4.00	2.00	$0.00	$0.00	$0.00	20,034	$242.17	$808,600
Reassess leak inspection log	3,339	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	6,678	$95.98	$320,493
File and maintain inspection log	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify leak inspection log	3,339	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	13,356	$191.97	$640,985
Facility Operating Record: Design/monitoring/operation/inspection information											
Reassess information	3,339	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	13,356	$191.97	$640,985
File and maintain information	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify information	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118

EXHIBIT 4:
ANNUAL RESPONDENT BURDEN/COST
FOR LARGE QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/page	@ $110.00/hr			
Facility Operating Record: Equipment Log											
Reassess equipment log	3,339	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	6,678	$95.98	$320,493
File and maintain an equipment log	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify equipment log	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Valve Log (265.1057)(g) and (h) (Not in compliance)											
Reassess valve log	835	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	1,670	$95.98	$80,147
File and maintain valve log	835	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	84	$2.51	$2,096
Modify valve log	84	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	336	$191.97	$16,125
Facility Operating Record: Valve Log (265.1062) (In compliance)											
Reassess valve log	167	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	334	$95.98	$16,029
File and maintain valve log	167	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	17	$2.51	$419
Modify valve log	17	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	68	$191.97	$3,263
Facility Operating Record: Criteria Log											
Reassess criteria log	3,339	0.00	0.00	2.00	0.00	$0.00	$0.00	$0.00	6,678	$95.98	$320,493
File and maintain criteria log	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify criteria log	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Facility Operating Record: Exemption Log											
Reassess exemption log	3,339	0.00	0.00	1.00	0.00	$0.00	$0.00	$0.00	3,339	$47.99	$160,246
File and maintain exemption log	3,339	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	334	$2.51	$8,381
Modify exemption log	334	0.00	0.00	4.00	0.00	$0.00	$0.00	$0.00	1,336	$191.97	$64,118
Subtotal	varies	0.00	varies	varies	varies	$294.70	$0.00	$367,400.00	130,459	varies	$6,386,894
Subtotal for LQG Pre-Transport Requirements	varies	0.00	varies	varies	varies	$294.70	$0.00	$778,800.00	148,243	varies	$7,625,466

EXHIBIT 5:
ANNUAL RESPONDENT BURDEN/COST ESTIMATES
FOR SMALL QUANTITY GENERATORS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Small Quantity Generator Pre-Transport Requirements											
Emergency Procedures (262.34(d))											
Observe scene of hazardous waste discharge	224	0.00	0.00	0.50	0.00	$0.00	$0.00	$0.00	112	$24.00	$5,375
Report by phone requested data items to NRC	224	0.00	0.00	0.25	0.00	$0.00	$0.00	$0.00	56	$12.00	$2,688
Document that local officials decline to enter into arrangements for coordinating response	224	0.00	0.00	0.10	0.00	$0.00	$0.00	$0.00	22	$4.80	$1,075
Post emergency information by phone	224	0.00	0.00	0.00	0.10	$0.00	$0.00	$0.00	22	$2.51	$562
Subtotal	224	0.00	0.00	varies	varies	$0.00	$0.00	$0.00	213	varies	$9,700
Requests for Extensions of the Accumulation Period (262.34(f))											
Prepare and submit request to Regional	224	0.00	0.10	0.00	0.40	$0.35	$0.00	$0.00	112	$17.72	$3,970
Subtotal	224	0.00	0.10	0.00	0.40	$78.40	$0.00	$0.00	112	$17.72	$3,970
Subtotal for SQG Pre-Transport Requirements	224	0.00	varies	varies	varies	$78.40	$0.00	$0.00	325	varies	$13,670

EXHIBIT 6:
ANNUAL RESPONDENT BURDEN/COST ESTIMATES
RECORDKEEPING AND REPORTING REQUIREMENTS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Recordkeeping and Reporting Requirements											
Recordkeeping and Reporting Requirements (262.40, 262.43)											
Store, file, and maintain records of any test results, was analyses, or other determinations	48,986	0.00	0.00	0.10	0.00	$0.00	$0.00	$0.00	4,899	$4.80	$235,097
Gather, provide additional information requested by EP	21	0.00	0.25	0.10	0.00	$0.35	$0.40	$0.00	7	$23.88	$497
Gather, provide additional information requested by EP	224	0.00	0.25	0.10	0.00	$0.35	$0.20	$0.00	78	$23.68	$5,307
TOTAL	varies	0.00	varies	0.10	0.00	$85.73	$53.15	$0.00	4,984	varies	$240,901

EXHIBIT 7:
ANNUAL RESPONDENT BURDEN/COST ESTIMATES
EXPORT REQUIREMENTS

	Number of Respondents	Hours per Respondent				O&M Costs/Respondent			Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
		Legal	Managerial	Technical	Clerical	Postage/ Shipping	Photocopies	Contractor			
		@ $93.48/hr	@ $73.32/hr	@ $47.99/hr	@ $25.10/hr	@ $0.35/doc	@ $0.10/pag	@ $110.00/hr			
Export Requirements											
Notification of Intent to Export Requirements (262.53(a))											
Collect specific export information	885	0.00	0.00	1.50	0.00	$0.00	$0.50	$0.00	1,328	$72.49	$64,152
Prepare and submit notification to EPA	885	0.00	0.10	0.30	1.50	$0.35	$0.00	$0.00	1,682	$59.73	$52,860
Subtotal	885	0.00	varies	varies	varies	$309.75	$442.50	$0.00	3,009	varies	$117,012
Renotification of Intent to Export Requirements (262.54(g))											
Collect specific changes to export information	50	0.00	0.00	0.50	0.00	$0.00	$0.10	$0.00	25	$24.10	$1,205
Prepare and submit notification to EPA	50	0.00	0.10	0.00	0.50	$0.35	$0.00	$0.00	30	$20.23	$1,012
Subtotal	50	0.00	varies	varies	varies	$17.50	$5.00	$0.00	55	varies	$2,216
Additional Reporting (262.53(d))											
Gather and provide additional information	3	0.00	0.00	0.50	0.50	$0.35	$0.10	$0.00	3	$37.00	$111
Subtotal	3	0.00	0.00	0.50	0.50	$1.05	$0.30	$0.00	3	$37.00	$111
Annual Report Requirements (262.56(a))											
Research specific export information (LQGs)	841	0.00	0.00	1.00	1.00	$0.00	$0.10	$0.00	1,682	$73.19	$61,554
Prepare and submit report (LQGs)	841	0.00	0.10	1.00	0.30	$0.35	$0.00	$0.00	1,177	$63.20	$53,155
Research specific export information (SQGs)	44	0.00	0.00	0.50	0.50	$0.00	$0.10	$0.00	44	$36.65	$1,612
Prepare and submit report (SQGs)	44	0.00	0.10	0.50	0.50	$0.35	$0.00	$0.00	48	$44.23	$1,946
Subtotal	varies	0.00	varies	varies	varies	$15.40	$4.40	$0.00	2,952	varies	$118,267
Recordkeeping Requirements (262.57(a))											
File and maintain notification and reports listed above	885	0.00	0.00	0.00	0.25	$0.00	$0.00	$0.00	221	$6.27	$5,553
Subtotal	885	0.00	0.00	0.00	0.25	$0.00	$0.00	$0.00	221	$6.27	$5,553
Subtotal for Export Requirements	varies	0.00	varies	varies	varies	$343.70	$452.20	$0.00	6,240	varies	$243,161

EXHIBIT 8
SUMMARY OF ANNUAL RESPONDENT RECORDKEEPING AND REPORTING BURDEN

GENERATOR ACTIVITY	TOTAL HOURLY BURDEN	TOTAL ANNUAL LABOR COST	CAPITAL COSTS	O&M COSTS
READ REGULATIONS	76,619	$4,570,954	-----	$0.00
LQGs PRE-TRANSPORT	46,285	$1,630,672	-----	$1,057,504.25
LQGs AIR EMISSION STANDARDS	148,243	$6,846,371	-----	$779,094.70
LQGs RECORDKEEPING AND REPORTING	426	$20,588	-----	$15.61
SQGs PRE-TRANSPORT	325	$13,591	-----	$78.40
SQGs RECORDKEEPING AND REPORTING	4,558	$220,313	-----	$123.26
EXPORTER REQUIREMENTS	6,240	$242,365	-----	$795.90
CAPITAL COSTS	-----	-----	$29,691.50	-----
TOTAL	282,696	$13,544,854	$29,691.50	$1,837,612.13

total average annual capital cost to all generators, collectively, to be approximately $29,691. EPA took the following steps to derive these costs:

- Estimate the total annual volume of reports required to be retained by all generators. In total, EPA estimates that LQGs must maintain approximately 112 pages of reports annually, while SQGs maintain approximately 2 pages.

- Ascertain the number of standard-size file cabinets that would provide the needed capacity and estimate the aggregate purchasing price. Given that a standard-size, five-drawer, lateral file cabinet holds approximately 16,000 pages, EPA estimates that the hazardous waste industry would need to purchase approximately 147 file cabinets each year (i.e., 2,344,384/16,000). These 147 file cabinets represent the total capacity needed by the industry, collectively, to store all of its reports. Based on its consultations, EPA estimates that the purchasing price for one file cabinet is $530, and for all 147 file cabinets, $77,910.

- Annualize the aggregate purchasing price using a net present value formula EPA used the following annualized net present value formula to calculate the annual cost to the hazardous waste industry to acquire these file cabinets:

  Annual Cost = $77,910(A/P, k, t)

  where A/P = capital recovery factor;
  k = discount rate of 7 percent;
  t = life of equipment (3 years).

  In total, EPA estimates that generators will need to pay an annual cost of $29,691.50 for the 147 file cabinets.

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the PRA as "the recurring dollar amount of cost associated with O&M or purchasing services." For this ICR, O&M costs cover postage and an envelope for reports sent to other parties (32 cents postage, 3 cents per envelope) and photocopying of reports submitted to the Agency (10 cents per page). LQGs that accumulate hazardous waste for 90 days or less using tank systems, drip pads, and containment buildings also will incur O&M costs for contractor services ($110/hr). In this ICR, O&M costs for contractor services are estimated for the following activities for which generators are most likely to use contractor services: demonstrations, leak tests, and independent certifications. O&M costs for postage and shipping, photocopying, and contractor services are shown in Exhibits 2 though 7 for all applicable acitivities.

6(c) ESTIMATING AGENCY BURDEN AND COST

EPA estimates in Exhibit 9 Agency burden hours and costs associated with all the requirements covered in this ICR. Since Regional Offices generally process all of the information collected under the requirements covered by this ICR, Regional labor costs are used in the calculation of Federal agency costs. EPA estimates an average Agency labor cost of $54.53 for Regional legal staff, $39.23 for Regional managerial staff, $27.53 for Regional technical staff, and $16.74 for Regional clerical staff. EPA used Federal Pay Schedule salary figures to estimate annual compensation of Regional managerial, technical, and clerical staff. For purposes of this ICR, EPA assigned Regional staff the following government service levels:

Legal staff	GS-15, Step 1
Managerial staff	GS-13, Step 1
Technical staff	GS-11, Step 1
Clerical staff	GS-06, Step 1

EPA divided annual compensation estimates by 2,080, the number of hours in a Federal work year, and multiplied the rates by the standard government overhead factor of 1.6 to derive hourly rates.

6(d) BOTTOM LINE BURDEN HOURS AND COSTS

Exhibits 8 and 10 show the aggregate burden and cost to respondents and the government, respectively. The bottom line burden to respondents over three years is 848,089 hours with a cost of approximately $46,236,471. The bottom line burden to the Agency over three years is 19,815 hours, at a cost of $519,018.

EXHIBIT 9:
ESTIMATED ANNUAL AGENCY BURDEN AND COSTS

		Hours per Respondent				O&M Costs/Respondent				
	Number of Respondents	Legal @ $54.53/hr	Managerial @ $39.23/hr	Technical @ $27.53/hr	Clerical @ $16.74/hr	Postage/ Shipping @ $0.35/doc	Photocopies @ $0.10/page	Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
Estimated Annual Agency Burden and Costs										
Pre-Transport Requirements (for both Large and Small Quantity Generators)										
Review revisions to contingency plan	628	0.00	0.00	0.50	0.00	$0.00	$0.00	314	$14	$8,644
Review documents in generator/emergency coordinator re	21	0.00	0.00	0.50	0.00	$0.00	$0.00	11	$14	$289
Review submitted release report information	21	0.00	0.00	0.50	0.00	$0.00	$0.00	11	$14	$289
Enter information into database tracking all releases	21	0.00	0.00	0.50	0.50	$0.00	$0.00	21	$22	$465
Transmit information to respective response authorities	21	0.00	0.00	0.25	0.25	$0.00	$0.00	11	$11	$232
Review information on equivalent containment devices	52	0.00	0.00	10.00	0.00	$0.00	$0.00	520	$275	$14,314
Review tank system assessment	157	0.00	0.00	10.00	0.00	$0.00	$0.00	1,570	$275	$43,218
Evaluate information for 24-hour leak detection exemption	5	0.00	0.00	10.00	0.00	$0.00	$0.00	50	$275	$1,376
Evaluate information for secondary containment variance	5	0.00	0.00	6.00	0.00	$0.00	$0.00	30	$165	$826
Review no-free-liquids demonstration	52	0.00	0.00	1.00	0.00	$0.00	$0.00	52	$28	$1,431
Review annual leak tests and inspections	209	0.00	0.00	1.00	0.00	$0.00	$0.00	209	$28	$5,753
Evaluate information for 24-hour waste removal exemptio	5	0.00	0.00	6.00	0.00	$0.00	$0.00	30	$165	$826
Review release notification reports	52	0.00	0.00	4.00	0.00	$0.00	$0.00	208	$110	$5,726
Review major repair certifications	52	0.00	0.00	8.00	0.00	$0.00	$0.00	416	$220	$11,452
Review requests for accumulation period extensions	21	0.00	0.00	3.00	0.00	$0.00	$0.00	63	$83	$1,734
Review plans for upgrading drip pads	21	0.00	0.00	1.00	0.00	$0.00	$0.00	21	$28	$578
Review and evaluate drawings and certifications of drip pa	21	0.00	0.00	2.00	0.00	$0.00	$0.00	42	$55	$1,156
Evaluate notices of releases from drip pads	21	0.00	0.00	2.00	0.00	$0.00	$0.00	42	$55	$1,156
Review repairs conducted to drip pads	21	0.00	0.00	1.00	0.00	$0.00	$0.00	21	$28	$578
Review and evaluate notificiations of releases of hazardou waste from containment buildings	21	0.00	0.00	3.00	0.00	$0.00	$0.00	63	$83	$1,734
Review notices of repairs to containment buildings	21	0.00	0.00	2.00	0.00	$0.00	$0.00	42	$55	$1,156
Subtotal	varies	0.00	0.00	varies	varies	$0.00	$0.00	3,746	varies	$102,935
Air Emission Standards Requirements (40 CFR Subparts AA and BB)										
Review notice to implement alternative valve standard in (265.1061)(a)	668	0.00	0.00	1.00	0.00	$0.00	$0.00	668	$28	$18,388
Review notice to discontinue alternative valve standard in (265.1061)(a)	7	0.00	0.00	1.00	0.00	$0.00	$0.00	7	$28	$193
Review notice to implement alternative valve standard (265.1061)(b)(2) and (265.1062)(b)(3)	167	0.00	0.00	1.00	0.00	$0.00	$0.00	167	$28	$4,597
Subtotal	varies	0.00	0.00	1.00	varies	$0.00	$0.00	842	varies	$23,178
Recordkeeping and Reporting Requirements (262.40, 262.43)										
Review submitted information	245	0.00	0.00	0.50	0.00	$0.00	$0.00	122	$14	$3,371
Enter information into database	245	0.00	0.00	0.50	0.50	$0.00	$0.00	245	$22	$5,421
Subtotal	245	0.00	0.00	0.50	varies	$0.00	$0.00	367	varies	$8,792

EXHIBIT 9:
ESTIMATED ANNUAL AGENCY BURDEN AND COSTS

		Hours per Respondent				O&M Costs/Respondent				
	Number of Respondents	Legal @ $54.53/hr	Managerial @ $39.23/hr	Technical @ $27.53/hr	Clerical @ $16.74/hr	Postage/ Shipping @ $0.35/doc	Photocopies @ $0.10/page	Total Hours per Year	Cost per Respondent/ Shipment	Total Cost per Year
Export Requirements (262.53, 262.55, 262.56, and 262.57)										
Review submitted information	885	0.00	0.00	1.00	0.00	$0.00	$0.00	885	$28	$24,362
Submit, in conjunction with Department of State, notification to receiving country and any transit countries	885	0.00	0.00	0.00	0.16	$0.35	$0.10	142	$3	$2,768
Forward to primary exporter acknowledgement of consent written notification of objection	885	0.00	0.00	0.00	0.16	$0.35	$0.10	142	$3	$2,768
Review renotification of intent to export forms and annual reports	50	0.00	0.00	0.25	0.00	$0.00	$0.00	13	$7	$344
Forward to receiving government additional information	3	0.00	0.00	0.00	0.16	$0.35	$0.00	0	$3	$9
Enter reviewed information into database	938	0.00	0.00	0.00	0.50	$0.00	$0.00	469	$8	$7,850
Subtotal	varies	0.00	0.00	varies	varies	$620.55	$177.00	1,650	varies	$38,101
Total	varies	0.00	0.00	varies	varies	$620.55	$177.00	6,605	varies	$173,006

EXHIBIT 10
SUMMARY OF ANNUAL AGENCY BURDEN & COSTS

GENERATOR ACTIVITY	TOTAL HOURLY BURDEN	TOTAL ANNUAL LABOR COST	O&M COSTS
GENERATOR PRE-TRANSPORT	3,746	$102,935	$0.00
GENERATOR AIR EMISSION STANDARDS	842	$23,178	$0.00
GENERATOR RECORDKEEPING AND REPORTING	367	$8,792	$0.00
EXPORTER	1,650	$37,303	$797.55
TOTAL	6,605	$172,208	$797.55

6(e) REASONS FOR CHANGE IN BURDEN

This ICR is an exhaustive description of the total respondent burden for all activities related to pre-transport, air emission, recordkeeping and reporting, and export generator requirements. Although we have decreased our estimate of the number of generators currently subject to the generator standards, the bottom-line burden has increased over the previous ICR's estimate because we have incorporated the information collection requirements of 40 CFR Part 265, Subparts AA and BB standards. In addition, EPA increased its estimate of the number of respondents that read the regulations. In the past ICR, EPA assumed that only a fraction of respondents would read the regulations annually, while, in this ICR, EPA assumes that all respondents will read the generator standards each year.

6(f) BURDEN STATEMENT

Exhibit 11 presents the estimated average burden hours per respondent per year for the public reporting and recordkeeping requirements covered by this ICR. The average public reporting burden for LQGs under this collection of information is estimated to range from 0.35 hours to 32.58 hours per year, and the public reporting burden for SQGs is estimated to range from 0.35 hours to 7.2 hours per year. This includes time for collecting and preparing (and submitting, if required) personnel training records, contingency plans, assessments/certifications of hazardous waste management units, and notifications and annual reports for exports. The recordkeeping burden for LQGs under this collection of information is estimated to range from 0.45 hours to 1.1 hours per year. The recordkeeping burden for SQGs is estimated to range from 0.30 hours to 0.75 hours per year. The recordkeeping burden includes time for reading the regulations and maintaining records.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

EXHIBIT 11
ANNUAL AVERAGE RESPONDENT BURDEN

Respondent Type	Reporting Burden	Recordkeeping Burden
LQGs	0.35 to 32.58 hours	0.45 to 1.1 hours
SQGs	0.35 to 7.2 hours	0.30 to 0.75 hours

Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through the use of automated collection techniques, to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M Street, S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.