

US EPA ARCHIVE DOCUMENT

Specific Part B Information Requirements

(1) Containers

All owner/operators of facilities submitting a Part B permit application and storing containers of hazardous waste (91 facilities) must provide a description of the containment system to demonstrate compliance with §264.175. EPA estimates that five percent of these new units (five facilities) store containers holding wastes that do not contain free liquids. Owner/operators of these facilities will submit the information required under §270.15(b). EPA estimates that one facility stores a container unit holding ignitable or reactive waste, and that one facility stores a container unit holding incompatible wastes. Owner/operators of these units will submit the appropriate information under §270.15(c) and (d).

(2) Tank Systems

All owner/operators of tank system units submitting a Part B permit application (104 facilities) must include an assessment of the new tank system's integrity with the Part B application. In addition, these owner/operators must submit the information required under §§270.16(b)-(g) and (i). This includes a description of the secondary containment system, since EPA estimates that no facilities will be granted an exemption from the secondary containment requirements under §264.193(g). EPA estimates that five percent of these tank system facilities (five facilities) will be required to submit information regarding ignitable, reactive, or incompatible wastes.

(3) Surface Impoundments

All owner/operators of surface impoundment facilities submitting a Part B permit application (2 facilities) and surface impoundment facilities that have lost interim status and are submitting an application for post-closure (87 facilities) are subject to the requirements of §270.17(b)-(g). However, because post-closure facilities will have submitted the plans, engineering report and description of inspection procedures under interim status, the burden associated with these activities for post-closure facilities is covered in the General Facility Standards ICR. The burden associated with the two surface impoundment facilities is covered in this ICR. In addition, although owners/operators of all surface impoundment facilities (two facilities) submitting a Part B permit application will submit a description of procedures for removal from service and the description of hazardous waste residues and contaminated materials to be removed at closure, only 10% of the post-closure facilities (nine facilities) will submit this information because 90% will have already submitted closure plans containing this information. EPA does not estimate that any facilities will be required to submit information regarding ignitable and reactive wastes, incompatible wastes or incompatible wastes and materials. Furthermore, EPA also does not anticipate that any facilities will submit management plans for F-wastes as required under §270.17(i).

(4) Waste Piles

EPA estimates that the owner/operator of the single new waste pile facility will submit a list of hazardous wastes, submit a description of hazardous waste residues and contaminated materials that will be removed at closure, and provide plans and an engineering report describing compliance with §264.310(a) and (b). The Agency does

not anticipate that the facility will submit any of the other reports, plans, or descriptions listed in Exhibit 2. Additionally, owners/operators submitting an application for post-closure for all waste pile units that have lost interim status are subject of these requirements. However, because this data will have been submitted under interim status for these units, the requirements are burdened in the General Facilities ICR.

(5) Incinerators

EPA estimates that for owners/operators of the 11 new incinerator units, 60 percent (seven units) will submit a trial burn plan or results of a trial burn under §270.19(b), and 40 percent (four units) will submit information in lieu of a trial burn under §270.19(c). EPA does not expect that any of these will be required to submit the information required under §270.19(a) for ignitable, corrosive, or reactive wastes.

(6) Land Treatment

EPA anticipates that no new owners/operators of land treatment units will submit a Part B permit application annually during the period covered by this ICR. All owners/operators of land treatment units (37 units) applying for post-closure permits must read the regulations, prepare a description and maintenance plan for the vegetative cover, and submit and file the required information.

(7) Landfills

All owner/operators of landfill units submitting a Part B permit application (for three units) must submit the information required under §§270.21(a), (b), (d) and (e). Owners and operators of landfill units applying for a post-closure permit (for 94 units) must read the regulations, prepare plans and engineering reports describing the final cover, prepare descriptions of post-closure maintenance and monitoring, and submit and file the required information. EPA estimates that one percent of Part B permit applications for landfill units (approximately zero units) will contain a demonstration for exemption from Subpart F requirements under §264.302(a), and therefore will be required to contain the plans and engineering report described in §270.21(c). EPA does not expect that any facilities will submit a waste management plan for F-wastes in their Part B applications.

(8) Miscellaneous Units

All owner/operators of miscellaneous units must submit the information required under §270.23(a)-(c). EPA estimates that owners and operators of all six miscellaneous units will be required to provide a report on the effectiveness of their treatment methods under §270.23(d) and 50 percent (three units) will be required to demonstrate treatment effectiveness.

(9) Process Vents and Equipment Leaks

EPA estimates that no facilities submitting Part B permit applications during the period covered by this ICR will have process vents and equipment leaks subject to the requirements of Subpart AA or Subpart BB.

(10) Drip Pads

EPA estimates that no facilities submitting Part B permit applications during the period covered by this ICR will want to use drip pads to collect, treat, and store hazardous waste during the period covered by this ICR.

EXHIBIT 2 (CONTINUED)
CONTENTS OF THE PART B APPLICATION
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Respon Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal \$93.97/hr	Manager \$71.49/hr	Technica \$46.79/hr	Clerical \$24.48/hr							
SPECIFIC PART B INFORMATION REQUIREMENTS (270.15-21, 270.23-25)											
Containers (270.15)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	91	45.50	\$2,690.87
Prepare a written description of the containmen	0.00	1.00	4.80	0.40	6.20	\$305.87	\$0.00	\$1,233.33	91	564.20	\$140,067.56
Prepare the no free liquids demonstration	0.00	0.00	1.50	0.00	1.50	\$70.19	\$0.00	\$475.00	5	7.50	\$2,725.93
Document compliance with §§264.176 and 264	0.00	0.30	2.40	0.20	2.90	\$138.64	\$0.00	\$500.00	5	14.50	\$3,193.20
Provide a written description of procedures used to ensure compliance with §§264.177(a) and (b), and 264.17(b) and (c)	0.00	1.30	16.80	1.30	19.40	\$910.83	\$0.00	\$700.00	5	97.00	\$8,054.17
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	91	45.50	\$1,386.84
File copies of the submitted information at the t	0.00	0.00	0.00	1.00	1.00	\$24.48	\$0.00	\$3.00	91	91.00	\$2,500.68
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	865.20	\$160,619.24
Tank Systems (270.16)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	104	52.00	\$3,075.28
Conduct assessment of new or existing tank sy	0.00	2.00	8.00	1.00	11.00	\$541.78	\$0.00	\$1,500.00	104	1,144.00	\$212,345.12
Prepare and certify the assessment	0.00	1.00	4.00	0.00	5.00	\$258.65	\$0.00	\$500.00	104	520.00	\$78,899.60
Compile information required under §270.16(c)	0.00	0.00	3.00	1.00	4.00	\$164.85	\$0.00	\$500.00	104	416.00	\$69,144.40
Provide a description of tank system installation	0.00	0.00	4.00	0.50	4.50	\$199.40	\$0.00	\$500.00	104	468.00	\$72,737.60
Prepare a description of the secondary containment system	0.00	1.00	5.00	0.40	6.40	\$315.23	\$0.00	\$1,200.00	104	665.60	\$157,584.13
Prepare description of controls and practices to prevent spills and overflows	0.00	0.00	3.00	0.50	3.50	\$152.61	\$0.00	\$0.00	104	364.00	\$15,871.44
Prepare description of how operating procedures and tank system and facility design will achieve compliance with the requirements of §§264.198 and 264.19	0.00	2.00	15.00	2.00	19.00	\$893.79	\$0.00	\$700.00	5	95.00	\$7,968.95
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	104	52.00	\$1,584.96
File copies of the submitted information at the f	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	104	10.40	\$566.59
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	3,787.00	\$619,778.07

EXHIBIT 2 (CONTINUED)
 CONTENTS OF THE PART B APPLICATION
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Respos Hours/ Year	Labor Cos/ Year	Capital/ Startup Cost	O & M Cost	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal	Manager	Technica	Clerical							
Surface Impoundments (270.17)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	89	44.50	\$2,631.73
Develop plans and engineering report	0.00	0.50	20.00	3.00	23.50	\$1,044.99	\$0.00	\$50,000.00	2	47.00	\$102,089.97
Prepare description of inspection procedures	0.00	0.00	6.00	1.50	7.50	\$317.46	\$0.00	\$0.00	2	15.00	\$634.92
Obtain a certification or statement from a qualified engineer	0.00	0.00	1.00	0.50	1.50	\$59.03	\$0.00	\$340.00	2	3.00	\$798.06
Develop a pump operating level	0.00	0.00	4.00	0.00	4.00	\$187.16	\$0.00	\$0.00	2	8.00	\$374.32
Prepare a description of procedures for removing the surface impoundment from service	0.00	0.50	6.00	0.50	7.00	\$328.73	\$0.00	\$0.00	11	77.00	\$3,615.98
Prepare a description of hazardous waste residues and contaminated materials to be removed from the unit at closure	0.00	0.50	6.00	0.50	7.00	\$328.73	\$0.00	\$0.00	11	77.00	\$3,615.98
Provide plans and engineering report	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0.00	\$15,000.00	2	40.00	\$31,787.14
Prepare explanation for ignitable and reactive w	0.00	1.30	16.80	1.30	19.40	\$910.83	\$0.00	\$700.00	0	0.00	\$0.00
Prepare explanation for incompatible wastes	0.00	0.50	8.00	0.50	9.00	\$422.31	\$0.00	\$350.00	0	0.00	\$0.00
Prepare a waste management plan for F-waste	0.00	0.50	6.00	0.50	7.00	\$328.73	\$0.00	\$0.00	0	0.00	\$0.00
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	2	1.00	\$30.48
File copies of the submitted information at the f	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	2	0.20	\$10.90
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	312.70	\$145,589.47

EXHIBIT 2 (CONTINUED)
 CONTENTS OF THE PART B APPLICATION
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity					Capital/ Startup Cost	Number of Res- pondents/ Activity	Total Cost per Year			
	0.00	0.25	0.50	1.00	1.50						
[SPECIFIC PART B INFORMATION REQUIREMENTS (CONTINUED)]											
Waste Piles (270.18)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	1	0.50	\$29.57
Prepare a list of hazardous wastes placed or to be placed in each waste pile	0.00	0.00	1.00	0.25	1.25	\$52.91	\$0.00	\$0.00	1	1.25	\$52.91
Prepare explanation of compliance with 264.254	0.00	0.00	3.00	0.50	3.50	\$152.61	\$0.00	\$0.00	0	0.00	\$0.00
Prepare engineering report describing compliance with 264.90(b)(2)	0.00	0.50	20.00	3.00	23.50	\$1,044.99	\$0.00	\$8,000.00	0	0.00	\$0.00
Develop plans and engineering report describing pile design, construction, operation and maintenance	0.00	1.00	9.00	0.00	10.00	\$492.60	\$0.00	\$16,600.00	0	0.00	\$0.00
Prepare description of inspection procedures and incorporate description into the inspection plan	0.00	0.00	6.00	1.50	7.50	\$317.46	\$0.00	\$0.00	0	0.00	\$0.00
Describe treatment processes and equipment, and identify the nature and quantity of residuals	0.00	0.00	1.00	0.50	1.50	\$59.03	\$0.00	\$0.00	0	0.00	\$0.00
Prepare explanation of compliance with requirements for ignitable or reactive wastes	0.00	0.25	3.00	0.25	3.50	\$164.36	\$0.00	\$0.00	0	0.00	\$0.00
Prepare explanation of compliance with 264.254 for incompatible wastes	0.00	0.25	3.00	0.25	3.50	\$164.36	\$0.00	\$0.00	0	0.00	\$0.00
Prepare a description of hazardous waste residual contaminated materials that will be removed from pile at closure, and incorporate the description into the closure and post-closure plans	0.00	0.25	1.00	0.75	2.00	\$83.02	\$0.00	\$0.00	0	0.00	\$0.00
Provide plans and an engineering report describing compliance with 264.310(a) and (b), and incorporate the description into the closure and post-closure plans	0.00	0.00	3.00	0.50	3.50	\$152.61	\$0.00	\$16,000.00	0	0.00	\$0.00
Prepare waste management plan for F-wastes	0.00	0.50	6.00	0.50	7.00	\$328.73	\$0.00	\$8,000.00	0	0.00	\$0.00
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	1	0.50	\$15.24
File a copy of the required information at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	1	0.10	\$5.45
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	2.35	\$103.17
Incinerators (270.18 and 270.62(b))											
Read the regulations	0.00	0.50	0.50	0.00	1.00	\$59.14	\$0.00	\$0.00	11	11.00	\$650.54
Prepare documentation for ignitable, corrosive, or reactive wastes	0.00	5.00	20.00	5.00	30.00	\$1,415.65	\$0.00	\$20,000.00	0	0.00	\$0.00
Prepare a trial burn plan	0.00	96.00	768.00	96.00	960.00	\$45,147.84	\$0.00	\$38,750.00	7	6,720.00	\$587,284.88
Perform the trial burn	0.00	260.00	2,080.00	260.00	2,597.00	\$122,135.03	\$0.00	\$318,750.00	7	18,179.00	\$3,086,195.21
Document results of a trial burn in accordance with 270.62(b)(6) and (8)	0.00	119.00	945.00	119.00	1,183.00	\$55,636.98	\$0.00	\$112,500.00	7	8,281.00	\$1,176,958.86
Prepare analysis of each waste or mixture of wastes to be burned	0.00	15.00	150.00	15.00	180.00	\$8,458.05	\$0.00	\$30,000.00	4	720.00	\$153,832.20
Prepare detailed engineering description of the incinerator	0.00	8.00	65.00	8.00	81.00	\$3,809.11	\$0.00	\$17,500.00	4	324.00	\$85,236.44

EXHIBIT 2 (CONTINUED)
 CONTENTS OF THE PART B APPLICATION
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Respons Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal \$93.97/hr	Manager \$71.49/hr	Technica \$46.79/hr	Clerical \$24.48/hr							
SPECIFIC PART B INFORMATION REQUIREMENTS (CONTINUED)											
Incinerators (270.19) (continued)											
Prepare a description and analysis of the waste to be burned and make comparisons to support claim that trial burn is not needed	0.00	5.00	40.00	5.00	50.00	\$2,351.45	\$0.00	\$20,000.00	4	200.00	\$89,405.80
Document and compare the design and operating conditions of the incinerator		6.30	50.00	6.30	62.60	\$2,944.11	\$0.00	\$25,000.00	4	250.40	\$111,776.44
Prepare and submit results from previous trial burn	0.00	0.50	0.50	1.00	2.00	\$83.62	\$0.00	\$3.00	4	8.00	\$346.48
Compile information on compliance with 264.343 and 264.345	0.00	5.00	40.00	5.00	50.00	\$2,351.45	\$0.00	\$20,000.00	4	200.00	\$89,405.80
Provide waste analysis data to identify POHCs	0.00	2.50	20.00	2.50	25.00	\$1,175.73	\$0.00	\$10,000.00	4	100.00	\$44,702.90
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	11	5.50	\$167.64
File a copy of the required information at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	11	1.10	\$59.93
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	35,000.00	\$5,426,023.12
Land Treatment (270.20)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	37	18.50	\$1,094.09
Prepare treatment demonstration plans	0.00	1.00	10.00	2.00	13.00	\$588.35	\$0.00	\$0.00	0	0.00	\$0.00
Prepare description of a land treatment program	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0.00	\$0.00	0	0.00	\$0.00
Prepare description of unit design, construction, operation and maintenance	0.00	1.00	5.00	1.00	7.00	\$329.92	\$0.00	\$0.00	0	0.00	\$0.00
Prepare a description of how demonstration will be conducted	0.00	0.00	6.00	1.00	7.00	\$305.22	\$0.00	\$0.00	0	0.00	\$0.00
Prepare description of compliance with 264.276	0.00	0.00	1.00	0.25	1.25	\$52.91	\$0.00	\$0.00	0	0.00	\$0.00
Prepare description of vegetative cover and incorporate the description in to the post-closure plan	0.00	0.00	1.00	0.50	1.50	\$59.03	\$0.00	\$0.00	37	55.50	\$2,184.11
Develop maintenance plan for the vegetative cover and incorporate the plan into the post-closure plan	0.00	0.00	0.50	0.25	0.75	\$29.52	\$0.00	\$1,000.00	37	27.75	\$38,092.06
Prepare explanation of compliance with requirements for ignitable and reactive wastes	-	-	-	-	0.00	\$0.00	\$0.00	\$700.00	0	0.00	\$0.00
Prepare explanation of compliance with requirements for incompatible wastes	-	-	-	-	0.00	\$0.00	\$0.00	\$350.00	0	0.00	\$0.00
Prepare a waste management plan for F-waste	-	-	-	-	0.00	\$0.00	\$0.00	\$8,000.00	0	0.00	\$0.00
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	37	18.50	\$563.88
File a copy of the required information at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	37	3.70	\$201.58
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	123.95	\$42,135.71

EXHIBIT 2 (CONTINUED)
 CONTENTS OF THE PART B APPLICATION
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Respon Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal	Manager	Technica	Clerical							
	\$93.97/hr	\$71.49/hr	\$46.79/hr	\$24.48/hr.							
SPECIFIC PART B INFORMATION REQUIREMENTS (CONTINUED)											
Landfills (270.21)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	97	48.50	\$2,869.29
Prepare list of wastes placed or to be placed in each landfill or landfill cell	0.00	0.25	1.00	0.75	2.00	\$83.02	\$0.00	\$0.00	3	6.00	\$249.07
Prepare plans and an engineering report describing landfill design, construction, operation and main	0.00	1.00	20.00	3.00	24.00	\$1,080.73	\$0.00	\$25,000.00	3	72.00	\$78,242.19
Prepare plans and an engineering report under	0.00	1.00	6.00	1.00	8.00	\$376.71	\$0.00	\$8,000.00	3	24.00	\$25,130.13
Prepare description of how the landfill inspection procedures and incorporate this description into the inspection plan	0.00	0.25	1.00	0.75	2.00	\$83.02	\$0.00	\$0.00	3	6.00	\$249.07
Develop a pump operating level	0.00	0.00	4.00	0.00	4.00	\$187.16	\$0.00	\$1,000.00	3	12.00	\$3,561.48
Prepare plans and engineering report describing the final cover, and incorporate this description into the closure and post-closure plans	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0.00	\$350.00	97	1,940.00	\$120,626.29
Prepare a description of how each landfill will be maintained and monitored after closure, and incorporate this description into the closure and post-closure	0.00	0.25	1.00	0.75	2.00	\$83.02	\$0.00	\$350.00	97	194.00	\$42,003.18
Prepare explanation of compliance for ignitable and reactive wastes	0.00	0.25	2.00	0.75	3.00	\$129.81	\$0.00	\$700.00	0	0.00	\$0.00
Prepare an explanation of compliance for incompatible wastes	0.00	0.25	2.00	0.75	3.00	\$129.81	\$0.00	\$350.00	0	0.00	\$0.00
Prepare explanation of compliance with landfilled containers of hazardous waste	0.00	0.25	1.00	0.75	2.00	\$83.02	\$0.00	\$350.00	0	0.00	\$0.00
Prepare a waste management plan for F-waste	0.00	0.50	6.00	0.50	7.00	\$328.73	\$0.00	\$8,000.00	0	0.00	\$0.00
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	97	48.50	\$1,478.28
File a copy of the required information at the fac	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	97	9.70	\$528.46
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	2,360.70	\$274,936.43
Miscellaneous Units (270.23)											
Read the regulations	0.00	0.50	0.50	0.00	1.00	\$59.14	\$0.00	\$0.00	6	6.00	\$354.84
Prepare detailed description of unit or proposed	0.00	1.00	5.00	0.50	6.50	\$317.68	\$0.00	\$1,200.00	6	39.00	\$9,106.08
Prepare hydrologic, geologic, and meteorologic assessments and land-use maps	0.00	1.50	13.30	1.90	16.70	\$776.05	\$0.00	\$6,000.00	6	100.20	\$40,656.32
Compile and prepare information on potential e	0.00	3.80	30.00	3.80	37.60	\$1,768.39	\$0.00	\$15,000.00	6	225.60	\$100,610.32
Prepare report on demonstration of treatment effectiveness	0.00	1.00	16.00	2.00	19.00	\$869.09	\$0.00	\$0.00	3	57.00	\$2,607.27
Submit the required information	0.00	0.00	0.00	0.50	0.50	\$12.24	\$0.00	\$3.00	6	3.00	\$91.44
File a copy of the required information at the fac	0.00	0.00	0.00	0.10	0.10	\$2.45	\$0.00	\$3.00	6	0.60	\$32.69
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	431.40	\$153,458.96

**EXHIBIT 2 (CONTINUED)
 CONTENTS OF THE PART B APPLICATION
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST**

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Respon- Hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal	Manager	Technica	Clerical							
	\$93.97/hr	\$71.49/hr	\$46.79/hr	\$24.48/hr							
SPECIFIC PART B INFORMATION REQUIREMENTS (CONTINUED)											
Process Vents and Equipment Leaks (270.24 and 270.25)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	20	10.00	\$591.40
Write and submit an implementation schedule	0.00	0.25	1.00	0.25	1.50	\$70.78	\$0.00	\$3.00	5	7.50	\$368.91
Prepare and submit documentation of compliance with process vent standards in 264.1032 and 264.1033	0.00	0.50	16.00	2.00	18.50	\$833.35	\$0.00	\$3.00	5	92.50	\$4,181.73
Write and submit a performance test plan	0.00	1.00	7.00	2.00	10.00	\$447.98	\$0.00	\$3.00	5	50.00	\$2,254.90
Compile and submit equipment information	0.00	0.50	3.00	0.50	4.00	\$188.36	\$0.00	\$3.00	15	60.00	\$2,870.33
Prepare and submit documentation of compliance with 264.1052 through 264.1059	0.00	1.00	16.00	2.00	19.00	\$869.09	\$0.00	\$3.00	15	285.00	\$13,081.35
Prepare and submit documentation of compliance with 264.1060	0.00	0.50	2.00	0.50	3.00	\$141.57	\$0.00	\$3.00	15	45.00	\$2,168.48
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	550.00	\$25,517.09
Drip Pads (270.26)											
Read the regulations	0.00	0.25	0.25	0.00	0.50	\$29.57	\$0.00	\$0.00	0	0.00	\$0.00
Prepare and submit a list of hazardous waste placed or to be placed on each drip pad	0.00	1.00	6.00	1.00	8.00	\$376.71	\$0.00	\$3.00	0	0.00	\$0.00
Develop and submit plans and an engineering report describing the design, construction, operation, and maintenance of each drip pad	0.00	1.00	6.00	1.00	8.00	\$376.71	\$0.00	\$16,600.00	0	0.00	\$0.00
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	0	0.00	\$0.00
Total	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	43,433.30	\$6,848,161.26