

US EPA ARCHIVE DOCUMENT

Schedules of Compliance

EPA estimates that owners and operators of five percent of all units submitting a Part B permit application (2 units) will submit a schedule of compliance with their Part B permit application. Of these units, owners and operators of approximately one percent (approximately zero units) will submit an alternative schedule of compliance, and one percent (approximately zero units) will submit an application for two compliance schedules. EPA does not anticipate that any facilities will submit evidence of firm public commitment to cease conducting regulated activities.

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 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 | | | | | | | |
| SCHEDULES OF COMPLIANCE (270.33) | | | | | | | | | | | |
| Read the regulations | 0.00 | 0.25 | 0.25 | 0.00 | 0.50 | \$29.57 | \$0.00 | \$0.00 | 44 | 22.00 | \$1,301.08 |
| Develop and submit a schedule of compliance | 0.00 | 0.50 | 2.00 | 0.50 | 3.00 | \$141.57 | \$0.00 | \$3.00 | 2 | 6.00 | \$289.13 |
| Develop and submit alternative schedule of con | 0.00 | 0.50 | 2.00 | 0.50 | 3.00 | \$141.57 | \$0.00 | \$3.00 | 0.1 | 0.39 | \$18.79 |
| Develop and submit application for two compliance schedules | 0.00 | 0.50 | 2.00 | 0.50 | 3.00 | \$141.57 | \$0.00 | \$3.00 | 0 | 0.39 | \$18.79 |
| Document and submit evidence of firm public commitment to cease conducting regulated activities | 0.00 | 0.50 | 1.00 | 0.50 | 2.00 | \$94.78 | \$0.00 | \$3.00 | 0 | 0.00 | \$0.00 |
| Total | 0.00 | varies | varies | varies | varies | varies | \$0.00 | varies | varies | 26.78 | \$1,627.80 |

Permit Modifications and Special Permits

Permit Modifications

(1) Transfer of Permits

In addition to the permit modifications discussed below, EPA estimates that ten owners and operators will submit the written agreement required to transfer ownership or operational control of a facility.

(2) Permit Modification at the Request of the Agency

Based on 1994-1996 RCRIS data, an average of 173 facilities will seek Class 1, 2, or 3 permit modifications during the period covered by this ICR.

(3) Permit Modification at the Request of the Permittee

As stated above, EPA expects 124 facilities will submit Class 1 permit modifications during the period covered by this ICR. Approximately 124 facilities will submit information required under 270.13 through 270.21 and 270.63 for Class 1 modifications. An additional 49 facilities will submit the Class 2 or 3 modifications.

(4) Temporary Authorizations

EPA estimates that 25 percent of the facilities seeking a Class 2 or Class 3 permit modification at their own request (12 facilities) will submit a request for temporary authorization under §270.42(e).

(5) Newly Regulated Wastes and Units

EPA does not estimate that any rules will regulate new wastes or units in the period covered by this ICR.

(6) Corrective Action Management Units

EPA estimates that no facilities will designate a corrective action management unit (CAMU). Therefore, no facilities will initiate modifications to their permits to incorporate the CAMU (264.552(g)).

Expiration and Continuation of Permits

EPA estimates that 20 facilities will submit applications annually for permit renewal during the period covered by this ICR. This number is based on information from RCRIS regarding the number of permits issued between October 1, 1994 and October 1, 1996 (i.e., an estimation of those expected to expire during the timeframe covered by the ICR), discounted by the percent EPA expects will pursue closure rather than renew permits. EPA estimates that the burden for preparing and submitting the Part B renewal application is comparable to the burden for Class 2 or 3 modification requests.

Special Forms of Permits

(1) Hazardous Waste Incinerator Permits

All owners and operators of incinerator facilities applying for a Part B permit (11 facilities) must submit the information required under this section.

(2) Permits for Land Treatment Demonstrations Using Field Test or Laboratory Analyses

All owners and operators of land treatment unit facilities applying for a Part B permit (zero facilities) must submit the information required under this section.

(3) Research, Development, and Demonstration (RD&D) Permits

All owners and operators of facilities applying for a RD&D permit (three facilities) must submit the information required under this section.

PERMIT MODIFICATIONS AND SPECIAL PERMITS
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 \$93.97/hr | Manager \$71.49/hr | Technica \$46.79/hr | Clerical \$24.48/hr. | | | | | | | |
| PERMIT MODIFICATIONS (270.40 - .42) | | | | | | | | | | | |
| Transfer of Permits (270.40(b)) | | | | | | | | | | | |
| Read the regulations | 0.50 | 0.10 | 0.15 | 0.00 | 0.75 | \$61.15 | \$0.00 | \$0.00 | 10 | 7.50 | \$611.53 |
| Prepare and submit the written agreement | 1.00 | 1.00 | 0.50 | 0.50 | 3.00 | \$201.10 | \$0.00 | \$3.00 | 10 | 30.00 | \$2,040.95 |
| Permit Modifications at the Request of the Agency (270.41) | | | | | | | | | | | |
| Read the regulations | 0.50 | 0.50 | 0.50 | 0.00 | 1.50 | \$106.13 | \$0.00 | \$0.00 | 173 | 259.33 | \$18,347.83 |
| Prepare and submit the modification request | 1.00 | 1.00 | 16.00 | 2.00 | 20.00 | \$963.06 | \$0.00 | \$3.00 | 173 | 3,457.78 | \$167,021.04 |
| Prepare and submit proof of public notice | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$3.00 | 173 | 259.33 | \$12,756.17 |
| File a record of the modification request | 0.00 | 0.00 | 0.00 | 0.10 | 0.10 | \$2.45 | \$0.00 | \$3.00 | 173 | 17.29 | \$941.90 |
| Permit Modifications at the Request of the Permittees (270.42(a)-(d)) | | | | | | | | | | | |
| Read the regulations for Class 1, 2, or 3 permit modifications (270.42(a)) | 2.00 | 1.00 | 1.00 | 0.00 | 4.00 | \$306.22 | \$0.00 | \$0.00 | 173 | 691.56 | \$52,942.04 |
| Prepare and submit the notification under 270.42(a) | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$3.00 | 173 | 259.33 | \$12,756.17 |
| Prepare and submit information required under 270.13 through 270.21, 270.62 and 270.63 for Class 1 modifications | 1.00 | 1.00 | 8.00 | 2.00 | 12.00 | \$588.74 | \$0.00 | \$3.00 | 124 | 1,482.67 | \$73,112.76 |
| Prepare and submit written notification to the public and appropriate governments | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$3.00 | 124 | 185.33 | \$9,116.24 |
| Prepare and submit the Class 2 or 3 modification request | 5.00 | 15.00 | 80.00 | 12.00 | 112.00 | \$5,579.16 | \$0.00 | \$8,000.00 | 49 | 5,525.33 | \$669,905.23 |
| Prepare and distribute written notification of the Class 2 or 3 modification request | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$0.00 | 49 | 74.00 | \$3,491.94 |
| Provide for newspaper publication of the notice | 0.00 | 0.00 | 1.00 | 0.50 | 1.50 | \$59.03 | \$0.00 | \$0.00 | 173 | 259.33 | \$10,205.63 |
| Prepare and submit proof of public notice | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$3.00 | 173 | 259.33 | \$12,756.17 |
| File a record of the Class 1-3 modification request | 0.00 | 0.00 | 0.00 | 0.10 | 0.10 | \$2.45 | \$0.00 | \$3.00 | 173 | 17.29 | \$941.90 |
| Prepare and submit information in support of a request for a classification of a permit modification (270.42(d)) | 0.00 | 0.00 | 2.00 | 0.00 | 2.00 | \$93.58 | \$0.00 | \$3.00 | 173 | 345.78 | \$16,697.61 |
| Temporary authorizations (270.42(e)) | | | | | | | | | | | |
| Read the regulations | 0.50 | 0.10 | 0.15 | 0.00 | 0.75 | \$61.15 | \$0.00 | \$0.00 | 12 | 9.00 | \$733.83 |
| Prepare and submit temporary authorization request | 1.00 | 0.50 | 6.00 | 1.00 | 8.50 | \$434.94 | \$0.00 | \$3.00 | 12 | 102.00 | \$5,255.22 |
| Prepare and distribute notification of request | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$0.00 | 12 | 18.00 | \$849.39 |
| Newly Regulated Wastes and Units (270.42(g)) | | | | | | | | | | | |
| Read the regulations | 0.00 | 0.10 | 0.15 | 0.00 | 0.25 | \$14.17 | \$0.00 | \$0.00 | 0 | 0.00 | \$0.00 |
| Submit the Class 1, 2 or 3 permit modification | 1.00 | 1.00 | 16.00 | 2.00 | 20.00 | \$963.06 | \$0.00 | \$1,000.00 | 0 | 0.00 | \$0.00 |
| Prepare and submit certification of compliance | 0.00 | 0.00 | 0.50 | 0.25 | 0.75 | \$29.52 | \$0.00 | \$3.00 | 0 | 0.00 | \$0.00 |
| Permit Modifications for CAMU designation (264.552(d) and (g)) | | | | | | | | | | | |
| Prepare and submit information for designation of a CAMU and related permit modification | 5.00 | 15.50 | 83.00 | 13.10 | 116.60 | \$5,782.20 | \$0.00 | \$25,000.00 | 0 | 0.00 | \$0.00 |
| Total | varies | varies | varies | varies | varies | varies | 0 | varies | varies | 13,260.19 | \$1,070,483.55 |

PERMIT MODIFICATIONS AND SPECIAL PERMITS
 ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

| INFORMATION COLLECTION ACTIVITY | Hours per Respondent/Activity | | | | Respos 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. | | | | | | | |
| EXPIRATION AND CONTINUATION OF PERMITS (270.50 - 51) | | | | | | | | | | | |
| Read the regulations | 0.50 | 0.10 | 0.15 | 0.00 | 0.75 | \$61.15 | \$0.00 | \$0.00 | 40 | 30.00 | \$2,446.10 |
| Complete and submit the Part B renewal applic | 5.00 | 15.00 | 80.00 | 12.00 | 112.00 | \$5,579.16 | \$0.00 | \$3.00 | 40 | 4,480.00 | \$223,286.40 |
| Total | 5.50 | 15.10 | 80.15 | 12.00 | 112.75 | \$5,640.31 | 0 | varies | 40 | 4,510.00 | \$225,732.50 |

| INFORMATION COLLECTION ACTIVITY | Hours per Respondent/Activity | | | | Respos Hours/ Year | Labor Cost/ Year | Capital/ Startup Cost | O & M Cost | Total Hours per Year | Total Cost per Year |
|---|-------------------------------|------------|------------|------------|--------------------------|------------------------|-----------------------------|---------------|----------------------------|------------------------|
| | Legal | Manager | Technica | Clerical | | | | | | |
| | \$93.97/hr | \$71.49/hr | \$46.79/hr | \$24.48/hr | | | | | | |
| SPECIAL FORMS OF PERMITS (270.60, .62 - .65) | | | | | | | | | | |
| Hazardous waste incinerator permits (270.62) | | | | | | | | | | |
| Read the regulations | 0.00 | 0.10 | 0.50 | 0.00 | 0.60 | \$30.54 | \$0.00 | \$0.00 | 11 | \$335.98 |
| Prepare and submit request for extension of operational period | 0.00 | 0.25 | 1.00 | 0.25 | 1.50 | \$70.78 | \$0.00 | \$3.00 | 11 | \$811.61 |
| Prepare certification of all submissions | 0.00 | 0.00 | 0.50 | 0.10 | 0.60 | \$25.84 | \$0.00 | \$350.00 | 11 | \$4,134.27 |
| Prepare and submit the required statements | 0.00 | 0.50 | 1.00 | 0.25 | 0.75 | \$88.66 | \$0.00 | \$3.00 | 11 | \$1,008.21 |
| Permits for land treatment demonstrations using field test or laboratory analyses (270.63) | | | | | | | | | | |
| Read the regulations | 0.00 | 0.10 | 0.15 | 0.00 | 0.25 | \$14.17 | \$0.00 | \$0.00 | 0 | \$0.00 |
| Prepare and submit the certification | 0.00 | 0.50 | 0.00 | 0.50 | 1.00 | \$47.99 | \$0.00 | \$350.00 | 0 | \$0.00 |
| Compile and submit the data collected | 0.00 | 0.25 | 0.50 | 0.25 | 1.00 | \$47.39 | \$0.00 | \$3.00 | 0 | \$0.00 |
| Research, development, and demonstration permits (270.65) | | | | | | | | | | |
| Read the regulations | 0.00 | 0.10 | 0.50 | 0.00 | 0.60 | \$30.54 | \$0.00 | \$0.00 | 3 | \$91.63 |
| Prepare and submit the permit application | 0.00 | 13.50 | 118.50 | 27.00 | 159.00 | \$7,170.69 | \$0.00 | \$3.00 | 3 | \$21,521.07 |
| Total | 0.00 | varies | varies | varies | varies | varies | \$0.00 | varies | varies | \$27,902.77 |

Interim Status

Termination of Interim Status

EPA does not expect there to be any regulatory or statutory amendments that would cause land disposal facilities to come under new permit requirements during the period covered by this ICR. Therefore, EPA does not expect any land disposal facilities to submit a certification.

PERMIT MODIFICATIONS AND SPECIAL PERMITS
 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 | | | | | | | |
| INTERIM STATUS (270.70 - .73) | | | | | | | | | | | |
| Termination of interim status (270.73) | | | | | | | | | | | |
| Read the regulations | 0.00 | 0.10 | 0.15 | 0.00 | 0.25 | \$14.17 | \$0.00 | \$0.00 | 0 | 0.00 | \$0.00 |
| Prepare and submit certification that an interim status facility is in compliance with ground-water monitoring and financial responsibility requirements | 0.00 | 2.50 | 13.00 | 4.00 | 19.50 | \$884.92 | \$0.00 | \$350.00 | 0.00 | 0.00 | \$0.00 |
| Total | 0.00 | varies | varies | varies | varies | \$899.08 | \$0.00 | varies | 0.00 | 0.00 | \$0.00 |