

ACCOUNTING CHANGES

This document presents specific accounting changes that could be made to OSW Information Collection Requests (ICRs). These accounting changes are not changes to paperwork requirements, but rather changes to the way we estimate burden in our ICRs. The proposed accounting changes are organized first by type of waste handler or type of information collection requirement, and then by ICR. For each accounting change, the following information is presented:

- brief summary of the accounting change;
- regulatory citation(s) affected by the accounting change;
- comments on the accounting change;
- EPA ICR and OMB Control Numbers affected by the accounting change;
- estimated burden reduction for the accounting change; and
- assumptions for the burden reduction estimate.

ACCOUNTING CHANGES

GENERATOR OPERATING STANDARDS					
Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Hazardous Waste Generator Standards ICR					
Read the Regulations					
Eliminate the burden associated with reading the regulations for existing facilities; only burden new facilities for this activity.	N/A		820 / 2050-0035	72,788	
Universal Waste ICR					
Read the Regulations					
Eliminate the burden associated with reading the regulations for existing facilities; only burden new facilities for this activity.	N/A		1597 / 2050-0145	8,517	
Modify Universe Estimates					
Use modified estimate of SQG universe (i.e., DSW estimate) to derive the universe of SQHUWs.	N/A		1597 / 2050-0145	20,730	
Labeling/Marking					
Reduce the estimated recordkeeping time for labeling or marking the universal waste or storage containers to identify the type of universal waste.	273.14 and 273.34		1597 / 2050-0145	12,040	If labeling/marketing provisions are retained under Part 273, this modified assumption would result in a savings of about 0.20 hours per SQHUW and 0.40 hours per LQHUW. (NOTE: The total burden reduction summarized above assumes that the labeling/marketing provisions are eliminated because they would be duplicative of DOT requirements.)

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Storage Time Limits					
Reduce the estimated recordkeeping time for labeling or marking storage containers or area used to store universal waste with the date the waste was received or became a waste.	273.15 and 273.35		1597 / 2050-0145	9,632	If labeling/marking provisions are retained under Part 273, this modified assumption would result in a savings of about 0.20 hours per SQHUW and 0.40 hours per LQHUW. (NOTE: The total burden reduction summarized above assumes that the labeling/marking provisions are eliminated because they would be duplicative of DOT requirements.)
Identification, Listing, and Rulemaking Petitions ICR					
Identification, Listing and Rulemaking Petitions					
Reevaluate the time allotted to read the regulations.	N/A	The time allotted for reading the regulations may be overestimated. Although it is a one-time cost, parties that have read the regulation previously will not require the 2 hours allotted for reading the regulations again. Only new facilities need to be burdened with reading the regulations. The estimated time must address the fact that former petitioners, already familiar with the regulations, will also submit information.	1189 / 2050-0053	471	The burden reduction estimate was calculated by assuming that half of all petitioners are already familiar with and do not need to reread the regulations. This would reduce the burden by almost 798 hours. The 798-hour savings were then reduced to reflect 41% exemption rate proposed by the HWIR.

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
TSDF OPERATING STANDARDS					
General Facility Operating Standards ICR					
Read the Regulations					
Eliminate the burden associated with reading the regulations for existing facilities; only burden new facilities for this activity.	Throughout the ICR		1571 / 2050-0120	122,591	
Maintain Records					
Standardize the recordkeeping time for maintaining records at .1 hour per activity (i.e., for filing and maintaining a single report).	Throughout the ICR		1571 / 2050-0120	16,238	
Specific Unit Requirements ICR					
All Facilities					
Change maintaining of documents and records to .1 hours (per activity).	Throughout the ICR	To avoid double counting, the burden reductions of the maintenance activities associated with altered requirements have been incorporated into the burden reductions for those requirements and are not accounted for here.	1572 / 2050-0050	24,664	
Change the burden of submitting documents to .25 hours (per submittal).	Throughout the ICR		1572 / 2050-0050	261	For facilities that must submit documents multiple times, the burden hours implicitly assume a burden of .25 hours per activity.

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Facility Groundwater Monitoring Requirements ICR					
Permitted Facilities					
Only burden newly permitted facilities for reading the regulations.	Throughout the ICR	The 1996 Beginning of the Year Plan estimates that there will be 8 newly permitted LDFs in FY97.	959 / 2050-0033	615	
PERMITTING PROCEDURES					
Part A ICR					
Part A Permit Application Requirements					
Reduce the amount of time required for reading the regulations for new facilities submitting Part A permit applications.	N/A	Six hours to read the regulations seems excessive.	262 / 2050-0034	168	The burden reduction estimate assumes three hours are required to read the regulations, a savings of 3 hours per respondent.
Revised Part A Permit Application/Justifications/Subpart H Compliance					
Reduce the amount of time required for reading the regulations for new facilities submitting Part A permit applications.	N/A	Six hours to read the regulations seems excessive.	262 / 2050-0034	9	The burden reduction estimate assumes three hours are required to read the regulations, a savings of 3 hours per respondent.
Part B ICR					
Reduction in Submitting Hours					
Reduce the clerical hours in submitting the required information from .50 to .25	Throughout the ICR		1573 / 2050-0009	146	

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Manifest ICR					
Waste Handlers Reading the Regulations					
For generators, transporters, and TSDFs, eliminate burden for reading the regulations. It is assumed that waste handlers incur this burden only once, not annually.	N/A		801 / 2050-0039	242,589	The burden reduction estimate was calculated by eliminating 90% of the burden associated with reading the regulations. We assumed that 10% of the facilities complying with manifest requirements will be new facilities and will thus have to read the regulations.
Notification ICR					
Read the Regulations					
Only burden new facilities for reading the regulations.	262.12, 263.11, 264.11, 265.11, 266.70, 266.80		261 / 2050-0028	24,000	The current burden estimate assumes all notifiers will read the regulations. The burden reduction estimate was calculated by assuming that 25 percent of the notifications will be submitted by new facilities.
MUNICIPAL SOLID WASTE DISPOSAL FACILITY REQUIREMENTS					
WasteWi\$e Program ICR					
Partner Registration Form					
Submit forms electronically.	N/A		1698 / 2050-0139	146	The burden reduction estimate is based on reduction for 50% of the facilities.

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Goals Identification Form (new partners only)					
Consider requiring partners to perform the goal identification activities prior to signing up in the program. Under that scenario, goals would be identified at the time partners join the program and included on the Partner Registration Form.	N/A	Requiring partners to identify goals at the time they register for the program would eliminate the hours associated with filling out the Goals Identification Form.	1698 / 2050-0139	225	The burden associated with activities related to identification goals would remain, but would get transferred under the heading of Partner Registration Form. The burden reduction estimate included here is based on the elimination of hours associated only with completing and transmitting the Goals Identification Form.
If the above suggestion is not implemented, submit forms electronically.	N/A	See comment above regarding electronic submission.	1698 / 2050-0139	219	
Goals Identification Form (recommitting partners only)					
As stated above, consider requiring partners to perform the goal identification activities prior to signing up in the program and include those goals on the Partner Registration Form.	N/A	See comment above regarding submission of the goals identification form.	1698 / 2050-0139	500	
If the above suggestion is not implemented, consider allowing the electronic submission of forms.	N/A	See comment above regarding electronic submission.	1698 / 2050-0139	487.5	
Annual Reporting Form					
Submit forms electronically.	N/A	See comment above regarding electronic submission.	1698 / 2050-0139	804	

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Endorser Registration Form					
Submit forms electronically.	N/A	See comment above regarding electronic submission.	1698 / 2050-0139	1,462	
Used Oil Requirements ICR					
Transporters and Transfer Facilities					
Eliminate the burden of obtaining EPA ID number.	279.42	Preparing and submitting the notification form is already burdened under ICR 261.	1286 / 2050-0124	58	
Eliminate the burden of reading the regulations for existing facilities.	N/A	These are not new regulations. The facilities should already have read them. Only new facilities would be subject to this burden and the ICR does not estimate that any new facilities will enter the universe.	1286 / 2050-0124	115	

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Processors and Re-refiners					
Eliminate burden of reading the regulations for existing facilities.	N/A	These are not new regulations. The facilities should already have read them. Only new facilities would be subject to this burden and the ICR does not estimate that any new facilities will enter the universe.	1286 / 2050-0124	199	
Eliminate the burden of developing contingency plan for existing facilities.	279.52(b)	All facilities should have a contingency plan already, as this is not a new requirement, and the ICR does not estimate any new facilities will enter the universe.	1286 / 2050-0124	1,910	
Eliminate the burden of preparing written analysis plan for existing facilities.	279.55	All facilities should have an analysis plan already, as this is not a new requirement, and the ICR does not estimate any new facilities will enter the universe.	1286 / 2050-0124	1,163	

ACCOUNTING CHANGES (continued)

Suggestions for Revising Burden Estimates	Citation	Comments	EPA ICR and OMB Control Numbers	Burden Reduction Estimate (Hours) ¹	Burden Reduction Assumptions
Burners					
Eliminate the burden of reading the regulations for existing facilities.	N/A	These are not new regulations. The facilities should already have read them. Only new facilities would be subject to this burden and the ICR does not estimate that any new facilities will enter the universe.	1286 / 2050-0124	173	

1. The burden reduction estimates come from current approved OSW ICRs and assumptions described in the "Burden Reduction Assumptions" column.