

## **6. ESTIMATING THE BURDEN AND COST OF COLLECTION**

### **6(a) ESTIMATING RESPONDENT BURDEN AND COSTS**

#### **LABOR COSTS**

EPA estimates an average hourly respondent labor cost (including overhead) of \$93.47 for legal staff, \$71.49 for managerial staff, \$46.79 for technical staff, and \$24.48 for clerical staff. To arrive at these estimates, EPA consulted with members of the regulated community.

#### **CAPITAL AND OPERATIONS AND MAINTENANCE COSTS**

EPA estimates that facilities complying with Part 270 will incur annual capital costs and operations and maintenance (O&M) costs associated with specific activities. EPA estimates that to maintain files, facilities will purchase file cabinets and make photocopies. EPA estimates that file storage and photocopying equipment will cost \$1.00 per respondent activity each year for the three-year period of the ICR. This estimate is used in calculating capital costs for relevant respondent activities. For submittals of information or notices, EPA estimates that facilities will incur \$3.00 in postage costs each year for the three-year period of the ICR. This estimate is based on the mailing cost of \$2.99 for a two-pound package, and is used in calculating O&M costs for relevant activities.

Using the total burden hours estimated in each exhibit below, Exhibit 4 illustrates the respondent costs associated with all of the information collection activities covered in this ICR. As shown in Exhibit 4, EPA estimates that the total annual respondent burden for all activities covered in this ICR is approximately 124,097 hours, at an annual cost of \$15,023,170.

EPA estimates respondent burden hours associated with all of the information collection requirements covered in this ICR in Exhibits 1 through 4. Exhibits 1 through 3 include the number of hours required to conduct the information collection activity and the cost associated with each requirement. Exhibit 4 provides annual bottom-line respondent burden and costs associated with all information collection requirements included in this ICR.

The Part B permit application includes facility-wide requirements, and also unit-specific requirements. EPA has used facility information contained in the Agency's RCRIS data base, when available, to estimate the total number of respondents currently subject to the facility-wide information collection requirements covered in this ICR. EPA also used recent RCRIS data to estimate the number of facilities expected to enter the permitted universe during the period covered by this ICR. EPA does not expect any facilities to enter the interim status universe during the period covered by this ICR. EPA used recent RCRIS data to estimate the number of units subject to the unit-specific information collection requirements covered in this ICR. The table below presents the universe estimates for owners/operators of TSDFs submitting the Part B permit application for specific types of units.

## Exhibit A Universe Estimates

Owners/Operators of TSDF	Number of Units
Tanks Systems	104
Surface Impoundments	2
Waste Piles	1
Land Treatment	0
Landfills	3
Incinerators	11
Containers	91
Miscellaneous Units	6

### Demonstrations and Exemptions from Requirements

#### Releases from Regulated Units

Based on previous experience, EPA estimates that two percent of the 6 land disposal facilities submitting a Part B permit application (approximately zero facilities) will submit a demonstration for exemption from the ground-water monitoring requirements under this section. EPA does not anticipate that any facilities will submit a no-migration demonstration under §264.90(b)(4).

The O&M costs associated with the leak detection system consist of contractor services for helping prepare the demonstration and also fees for obtaining certification for a no-migration demonstration.

#### Specific Unit Requirements

##### (1) Tank Systems

EPA estimates that five percent of the 104 tank system facilities submitting a Part B permit application (five facilities) will submit a demonstration under §264.193(g)(1). In addition, EPA estimates that five percent of these tank system facilities (five facilities) will submit demonstrations for exemption from the 24-hour leak detection requirement, and that five facilities will also submit a demonstration for exemption from the 24-hour waste removal requirement. EPA also estimates that five facilities will submit a written description of an equivalent containment device.

## **(2) Surface Impoundments**

EPA estimates that, each year, one percent of the 2 surface impoundment facilities submitting a Part B permit application (approximately zero) will submit the demonstrations for an exemption from the liner requirements of §264.221(a) and the double liner and leachate collection and removal system requirements of §264.221(c). In addition, EPA estimates that zero facilities will submit a demonstration for a waiver of the double liner requirements for monofills. EPA also estimates that 54 percent (approximately one facility) will submit a demonstration showing that the leak detection system will not be adversely affected by the presence of ground water, and that one facility will submit a demonstration for an exemption for a replacement surface impoundment unit.

## **(3) Waste Piles**

EPA anticipates the single waste pile facility submitting a Part B permit application will not submit a demonstration for an exemption from the liner and leachate collection system requirements of §§264.251(b) and (d). EPA estimates that the facility will submit a demonstration showing that the leak detection system will not be adversely affected by the presence of ground water. EPA also estimates that less than one facility (.29 facility) will not submit a demonstration for an exemption for a replacement waste pile unit.

## **(4) Land Treatment**

EPA does not anticipate that any new land treatment facilities will submit a demonstration under §264.272 during the period covered by this ICR.

## **(5) Landfills**

EPA estimates that none of the three landfill facilities submitting a Part B permit application will submit demonstrations for an exemption from the liner requirements of §264.301(a) and the double liner and leachate collection and removal system requirements of §264.301(c). EPA does not anticipate that any landfill facilities will submit a demonstration for a waiver of the double liner requirements for monofills. EPA estimates that two landfill facilities will submit a demonstration showing that the leak detection system will not be adversely affected by the presence of ground water. EPA also estimates that one facility will submit a demonstration for an exemption for a replacement landfill unit.

## **(6) Incinerators**

EPA estimates that one percent of the 11 incinerator facilities submitting a Part B permit application (approximately zero facilities) will submit a demonstration under this section.

INFORMATION COLLECTION ACTIVITY	Legal \$93.97/hr.	Manager \$71.49/hr.	Technical \$46.79/hr.	Clerical \$24.48/hr.	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
<b>RELEASES FROM REGULATED UNITS (264.90)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	6	6.00	\$280.74
Prepare and submit the appropriate demonstration 264.9	0.00	1.00	16.00	2.00	19.00	\$869.09	\$0	\$8,000.00	0	0.00	\$0.00
Obtain certification for no-migration demonstration	0.00	0.50	1.00	0.50	2.00	\$94.78	\$0	\$340.00	0	0.00	\$0.00
File a copy of the demonstration at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	0	0.00	\$0.00
Total	varies	varies	varies	varies	varies	varies	varies	varies	varies	6.00	\$280.74
<b>DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS (264.193 - 264.344)</b>											
<b>Tank Systems (264.193)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	104	104.00	\$4,866.16
Prepare and submit the demonstration notification	0.00	0.10	0.90	0.50	1.50	\$61.50	\$0	\$3.00	5	7.50	\$322.50
Prepare and submit the demonstration under 264.193(g)(1)	0.00	1.00	16.00	2.00	19.00	\$869.09	\$0	\$3.00	5	95.00	\$4,360.45
Prepare and submit the demonstration from the 24-hour leak detection requirement	0.00	0.50	8.00	1.50	10.00	\$446.79	\$0	\$3.00	5	50.00	\$2,248.93
Prepare and submit the demonstration from the 24-hour waste removal requirement	0.00	0.50	8.00	1.50	10.00	\$446.79	\$0	\$3.00	5	50.00	\$2,248.93
Prepare and submit a written description of the equivalent secondary containment device	0.00	0.50	8.00	1.50	10.00	\$446.79	\$0	\$3.00	5	50.00	\$2,248.93
File a copy of the demonstrations at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$3.00	5	0.50	\$16.24
Subtotal <sup>1</sup>	varies	varies	varies	varies	varies	varies	varies	varies	varies	357.00	\$16,312.13
<b>Surface Impoundments (264.221)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	2	2.00	\$93.58
Prepare and submit the demonstration for an exemption from the liner requirements of 264.221(a)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration for an exemption from the double liner and leachate collection system requirements of 264.221(c)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration that the leak detection system will not be adversely affected by the presence of ground water	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	1	20.00	\$896.57
Prepare and submit the monofill waiver demonstration	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	1	20.00	\$896.57
Prepare and submit the demonstration for exemption for replacement units	0.00	0.25	4.00	0.25	4.50	\$211.15	\$0	\$3.00	1	4.50	\$214.15
File a copy of the demonstrations at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$3.00	2	0.20	\$12.90
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	46.70	\$2,113.77

This subtotal varies because the respondents under section 264.193 are not necessarily the same five facilities for each requirement.

EXHIBIT 1  
 DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS  
 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.	Technical \$46.79/hr.	Clerical \$24.48/hr.							
<b>DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS (CONTINUED)</b>											
<b>Waste Piles (264.251)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	1	1.00	\$46.79
Prepare and submit the demonstration for an exemption from the liner and leachate collection system requirements of 264.251(a)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration that the leak detection system will not be adversely affected by the presence of ground water	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	1	20.00	\$896.57
Prepare and submit the demonstration for an exemption from the double liner and leachate collection system requirements of 264.251(c)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0.29	5.71	\$256.16
Prepare and submit the demonstration for exemption for replacement units	0.00	0.25	4.00	0.25	4.50	\$211.15	\$0	\$3.00	0.29	1.29	\$61.19
File a copy of the demonstrations at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	1	0.10	\$3.45
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	28.10	\$1,264.16
<b>Land Treatment (264.272)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	0	0.00	\$0.00
Prepare and submit the demonstration	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
File a copy of the demonstration at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	0	0.00	\$1.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	0.00	\$1.00
<b>Landfills (264.301)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	3	3.00	\$140.37
Prepare and submit the demonstration for an exemption from the liner requirements of 264.301(a)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration that the leak detection system will not be adversely affected by the presence of ground water	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	2	40.00	\$1,793.14
Prepare and submit the demonstration for an exemption from the double liner and leachate collection and removal system requirements of 264.301(c)	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration for a waiver of the double liner requirements for monofills	0.00	1.00	16.00	3.00	20.00	\$893.57	\$0	\$3.00	0	0.00	\$0.00
Prepare and submit the demonstration for exemption for replacement units	0.00	0.25	4.00	0.25	4.50	\$211.15	\$0	\$0.00	1	4.50	\$211.15
File a copy of the demonstrations at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	2	0.20	\$6.90
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	47.70	\$2,151.56

EXHIBIT 1  
 DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS  
 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.	Technical \$46.79/hr.	Clerical \$24.48/hr.							
<b>Incinerators (264.344)</b>											
Read the regulations	0.00	0.25	2.00	0.00	2.25	\$111.45	\$0	\$0.00	11	24.75	\$1,225.98
Prepare and submit the demonstration for an extension of the pre-trial burn period	0.00	0.50	8.00	2.00	10.50	\$459.03	\$0	\$3.00	0	0.00	\$0.00
File a copy of the demonstration at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	varies	varies	varies	24.75	\$1,225.98
Total	varies	varies	varies	varies	varies	varies	varies	varies	varies	504.25	\$23,068.59

## **Contents of the Part B Application**

### **Legal Review**

EPA estimates that for all facilities submitting a Part B permit application (44 facilities) and all facilities that have lost interim status and are submitting an application for post-closure care (100 facilities), owners/operators will have legal counsel review the completed application prior to submittal to EPA, even though there is no regulatory requirement to do so.

### **General Information**

Section 270.1(c)(5) applies only to owners/operators of surface impoundments, land treatment units, and waste piles closing by removal or decontamination prior to November, 1984. Therefore, EPA estimates that no facilities will submit a petition under this section during the period covered by this ICR.

### **Permit Application**

Section 270.10(j) applies only to Part B permit applications submitted by owners and operators of facilities that store, treat, or dispose of hazardous waste in a surface impoundment or landfill. Therefore, five facilities (two surface impoundments and three landfills) will submit the information required under this section.

### **General Requirements**

EPA estimates that one percent of the 44 facilities submitting a Part B permit application (0.4 facilities) will submit a demonstration for relief from specific Part B information requirements under §270.14(a).

EXHIBIT 2  
 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.	Technical \$46.79/hr.	Clerical \$24.48/hr.							
<b>Legal Review</b>											
Review completed permit application	100.0	0.00	0.00	0.00	100.00	\$9,397.00	\$0	\$0.00	144	14,400.00	\$1,353,168.00
<b>Total</b>	<b>100.0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>100.00</b>	<b>\$9,397.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>144</b>	<b>14,400.00</b>	<b>\$1,353,168.00</b>
<b>General Information (270.1)</b>											
Read the regulations	0.00	0.00	1.00	0.00	1.00	\$46.79	\$0	\$0.00	0	0.00	\$0.00
Develop and submit the petition for exemption from the post-closure permitting requirements	0.00	0.25	4.00	0.50	4.75	\$217.27	\$0	\$3.00	0	0.00	\$0.00
File a copy of the petition at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	0	0.00	\$0.00
<b>Total</b>	<b>0.00</b>	<b>0.25</b>	<b>5.00</b>	<b>0.60</b>	<b>5.85</b>	<b>\$266.51</b>	<b>\$1.00</b>	<b>\$3.00</b>	<b>0</b>	<b>0.00</b>	<b>\$0.00</b>
<b>Permit Application (270.10(j))</b>											
Read the regulations	1.00	0.00	1.00	0.00	2.00	\$140.76	\$0	\$0.00	5	10.00	\$703.80
Collect and submit the required data	1.00	0.25	8.00	0.75	10.00	\$504.52	\$0	\$3.00	5	50.00	\$2,537.61
File the data at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	5	0.50	\$17.24
<b>Total</b>	<b>2.00</b>	<b>0.25</b>	<b>9.00</b>	<b>0.85</b>	<b>12.10</b>	<b>\$647.73</b>	<b>\$1.00</b>	<b>\$3.00</b>	<b>5</b>	<b>60.50</b>	<b>\$3,258.65</b>
<b>General Requirements (270.14(a))</b>											
Read the regulations	1.00	1.00	0.25	0.00	2.25	\$177.16	\$0	\$0.00	0.4	0.90	\$70.86
Prepare and submit the demonstration	1.00	1.00	4.00	0.50	6.50	\$364.86	\$0	\$3.00	0.4	2.60	\$147.14
File a copy of the demonstration at the facility	0.00	0.00	0.00	0.10	0.10	\$2.45	\$1	\$0.00	0.4	0.04	\$1.38
<b>Total</b>	<b>2.00</b>	<b>2.00</b>	<b>4.25</b>	<b>0.60</b>	<b>8.85</b>	<b>\$544.47</b>	<b>\$1.00</b>	<b>\$3.00</b>	<b>0.4</b>	<b>3.54</b>	<b>\$219.39</b>