General Facility Standards

Based on previous experience, EPA makes the following estimates regarding the Part B requirements for general facility standards:

- 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 (100 facilities) will read the regulations, prepare a written description of the facility, and submit and file the general facility standards information;

- All facilities submitting a Part B permit application (44 facilities) will collect the information required under Section 270.14(b)(2). In addition, there have been O&M costs for contractor services to help prepare chemical and physical analyses of the hazardous waste and hazardous debris to be handled at the facility.

- The burden associated with preparing the waste analysis plan, inspection schedule, contingency plan and personnel training programs for interim status facilities are covered in the General Facility Standards ICR. Therefore, this ICR covers only the burden for facilities submitting a Part B permit application (44 facilities). In addition, facilities will incur operations and maintenance costs, to collect the data for the waste analysis plan, to write the plan, and to collect data for the contingency plan.

- One percent of the facilities submitting a Part B permit application (less than one facility) will submit a demonstration for a waiver of the security procedures and equipment requirements (§270.14(b)(4)). EPA estimates that of these facilities, zero will receive a waiver; therefore, 44 facilities will prepare a description of security procedures and equipment requirements;

- One percent of the facilities submitting a Part B permit application (less than one facility) will submit a demonstration for an exemption from special equipment requirements;

- One percent of facilities submitting a Part B permit application (less than one facility) will submit a demonstration for an exemption from aisle space requirements under §270.14(b)(6);

- Forty percent of the facilities submitting a Part B permit application (18 facilities) will have to submit information regarding ignitable, reactive, or incompatible wastes under §270.14(b)(9);

- All facilities submitting a Part B permit application (44 facilities) will submit a description of traffic patterns, volume, and control, and compile and document facility location information;

- No facilities will prepare a demonstration of compliance with the seismic standard (§270.14(b)(11));

- EPA does not anticipate that any facilities that have lost interim status and are submitting an application for post-closure are located in a 100-year floodplain. Therefore, EPA does not anticipate that these facilities will submit an exemption demonstration. Therefore, all 100 facilities will prepare an engineering analysis and engineering studies. In addition, there have been O&M costs for contracting services to conduct the engineering analyses and engineering studies;

- Five percent of the facilities submitting a Part B permit application (two facilities) will submit a compliance plan and schedule;

- All facilities submitting a Part B permit application will submit a description of the necessary closure activities, a cost estimate for final closure, and a closure schedule;

- All land-based facilities submitting a Part B permit application (6 facilities) and all land-based facilities that have lost interim status and are submitting an application for post-closure (100 facilities) will develop post-closure plans; and

- No facilities will submit documentation that post-closure notices have been filed under §264.119.

EXHIBIT 2
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.	Technical $46.79/hr.	Clerical $24.48/hr.							
General Facility Standards (270.14(b)(1)-(14))											
Read the regulations	0.00	0.50	8.00	0.00	8.50	$410.07	$0	$0.00	144	1,224.00	$59,049.36
Prepare a written description of the facility	0.00	1.00	8.00	2.00	11.00	$494.77	$0	$0.00	144	1,584.00	$71,246.88
Collect the analytical information required under 270.14(b)(2) and prepare a written report of the analyses conducted	0.00	0.00	40.00	2.00	42.00	$1,920.56	$0	$4,000.00	44	1,848.00	$260,504.64
Collect the data required in the waste analysis plan	0.00	0.00	10.00	0.00	10.00	$467.90	$0	$0.00	44	440.00	$20,587.60
Write the waste analysis plan	0.00	10.00	60.00	0.50	70.50	$3,534.54	$0	$350.00	44	3,102.00	$170,919.76
Prepare a description of security procedures and equipment requirements	0.00	0.00	1.50	0.25	1.75	$76.31	$0	$0.00	44	77.00	$3,357.42
Prepare a demonstration from exemption from the security procedures and equipment requirements	0.00	0.00	0.50	0.50	1.00	$35.64	$0	$0.00	0.44	0.44	$15.68
Develop an inspection schedule	0.00	8.00	80.00	1.00	89.00	$4,339.60	$0	$0.00	44	3,916.00	$190,942.40
Prepare demonstration for exemption from special equipment requirements	0.00	0.25	0.50	0.25	1.00	$47.39	$0	$0.00	0.44	0.44	$20.85
Prepare demonstration for exemption from aisle space requirements	0.00	0.25	0.50	0.25	1.00	$47.39	$0	$0.00	0.44	0.44	$20.85
Collect the data required in the contingency plan	0.00	0.00	12.00	3.00	15.00	$634.92	$500	$0.00	44	660.00	$49,936.48
Write the contingency plan	0.00	1.00	60.00	4.00	65.00	$2,976.81	$0	$0.00	44	2,860.00	$130,979.64
Prepare the description of procedures, structures, or equipment	0.00	0.25	4.00	0.50	4.75	$217.27	$0	$0.00	44	209.00	$9,559.99
Prepare a description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes	0.00	0.25	1.50	0.25	2.00	$94.18	$0	$0.00	18	36.00	$1,695.20
Prepare description of traffic patterns, volume, and control	0.00	0.10	1.00	0.15	1.25	$57.61	$0	$0.00	44	55.00	$2,534.88
Compile and document the facility location information	0.00	0.00	2.00	0.50	2.50	$105.82	$0	$0.00	44	110.00	$4,656.08
For facilities located in a Part 264, Appendix VI area, prepare demonstration of compliance with the seismic standard	0.00	0.25	1.00	0.75	2.00	$83.02	$0	$0.00	0	0.00	$0.00
For facilities located in a 100-year floodplain, prepare demonstration for exemption from design and operating standards under 264.18(b)	0.00	0.25	4.00	0.75	5.00	$223.39	$0	$0.00	0	0.00	$0.00
For facilities located in a 100-year floodplain, prepare engineering analysis and studies	0.00	1.00	16.00	4.00	21.00	$918.05	$0	$4,600.00	100	2,100.00	$551,805.00
Prepare compliance plan and schedule of compliance	0.00	1.00	4.00	1.00	6.00	$283.13	$0	$0.00	2	12.00	$566.26
Prepare outline of personnel training programs and description of training design	0.00	0.50	20.00	0.50	21.00	$983.79	$0	$0.00	44	924.00	$43,286.54
Write descriptions for the necessary closure activities	0.00	2.00	16.00	2.00	20.00	$940.58	$0	$0.00	44	880.00	$41,385.52

EXHIBIT 2
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.	Technical $46.79/hr.	Clerical $24.48/hr.							
Estimate final closure cost	0.00	1.00	8.00	1.00	10.00	$470.29	$0	$0.00	44	440.00	$20,692.76
Write the closure schedule	0.00	0.25	1.00	0.00	1.25	$64.66	$0	$0.00	44	55.00	$2,845.15
Collect the necessary information for post-closure requirements	0.00	1.00	12.00	7.00	20.00	$804.33	$0	$0.00	106	2,120.00	$85,258.98
Write the post-closure plan	0.00	1.00	8.00	1.00	10.00	$470.29	$0	$0.00	106	1,060.00	$49,850.74
Prepare documentation that the post-closure notices required under §264.119 have been filed	0.00	0.25	4.00	0.75	5.00	$223.39	$0	$0.00	0	0.00	$0.00
Submit the general facility standards information	0.00	0.00	0.00	0.10	0.10	$2.45	$0	$3.00	144	14.40	$784.51
File copies of all required documentation at the facility	0.00	0.00	0.00	0.50	0.50	$12.24	$1	$0.00	144	72.00	$1,906.56
Total	0.00	varies	varies	varies	varies	varies	varies	varies	varies	23,799.72	$1,774,409.73

Financial Assurance

All facilities submitting a Part B permit application (44 facilities) and facilities that have lost interim status and are submitting an application for post-closure (100 facilities) must submit cost estimates for closure and post-closure care in their Part B permit applications. All respondents must also submit financial assurance information, with the exception of those using State financial mechanisms in lieu of the Federal mechanisms (one percent, or one facility). EPA does not anticipate that any of this facility will be required to submit additional information. EPA estimates no facilities will be required by EPA to furnish additional information under the State assumption of responsibility requirements. All land disposal facilities submitting a Part B permit application (6 facilities) must also submit documentation of liability coverage.

EPA estimates that one percent of the respondent universe (one facility) will submit an application for variance from the financial responsibility requirements, but that none will obtain a variance. In addition, EPA estimates that one facility will be required to submit additional information under §264.147(d).

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

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity Legal $93.97/hr.	Manager $71.49/hr.	Technical $46.79/hr.	Clerical $24.48/hr.	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
FINANCIAL ASSURANCE (270.14(b) (15)-(16))											
Cost Estimates for Closure and Post-Closure Care (264.142 and 264.144)											
Read the regulations	0.00	0.00	1.00	0.00	1.00	$46.79	$0	$0.00	144	144.00	$6,737.76
Collect data	0.00	0.00	5.00	1.00	6.00	$258.43	$0	$0.00	144	864.00	$37,213.92
Prepare and submit the written cost estimates	0.00	0.00	5.00	2.00	7.00	$282.91	$0	$3.00	144	1,008.00	$41,171.04
Financial Assurance for Closure/Post Closure Care (264.143 and 264.145)											
Read the regulations	0.00	0.50	0.50	0.00	1.00	$59.14	$0	$0.00	143	143.00	$8,457.02
Obtain and submit documentation of financial assurance	0.00	0.00	2.00	1.00	3.00	$118.06	$0	$3.00	143	429.00	$17,311.58
Coverage for Sudden or Nonsudden Accidental Occurences (264.147(a) and (b))											
Read the regulations	0.00	0.50	0.50	0.00	1.00	$59.14	$0	$0.00	6	6.00	$354.84
Obtain and submit documentation of liability coverage	0.00	0.00	2.00	1.00	3.00	$118.06	$0	$3.00	6	18.00	$726.36
Request for Variance (264.147(c))											
Read the regulations	0.00	0.10	0.15	0.00	0.25	$14.17	$0	$0.00	1	0.25	$14.17
Prepare and submit request for variance	2.00	0.50	2.00	1.00	5.50	$341.75	$0	$3.00	1	5.50	$344.75
Adjustments by the Regional Administrator (264.147(d)											
Read the regulations	0.00	0.1	0.15	0	0.25	$14.17	$0	$0.00	1	0.25	$14.17
Prepare and submit to EPA any requested information	0.00	0.50	1.00	0.50	2.00	$94.78	$0	$3.00	0	0.00	$0.00
Coverage by a State Financial Mechanism (264.147(b)(18)											
Read the regulations	0.00	0.10	0.15	0.00	0.25	$14.17	$0	$0.00	1	0.25	$14.17
Submit letter from owner or operator	1.00	0.50	1.00	0.50	3.00	$188.75	$0	$3.00	1	3.00	$191.75
Submit written evidence of establishment of State-required financial assurance mechanism or letter from the State describing assumption of responsibility	0.00	0.00	0.50	0.50	1.00	$35.64	$0	$3.00	1	1.00	$38.64
Submit additional information requested by EPA	0.00	0.50	1.00	0.50	2.00	$94.78	$0	$3.00	0	0.00	$0.00
Total	varies	varies	varies	varies	varies	varies	varies	varies	varies	2,622.25	$112,590.15

Other Requirements

(1) Topographical Map

All facilities submitting a Part B permit application (44 facilities) must submit a topographical map as required under §270.14(b)(19) in their Part B permit applications. These facilities are expected to incur an operations and maintenance cost in developing and submitting the map.

(2) Case-By-Case Extensions and Petitions to Allow Land Disposal of a Waste Prohibited Under Subpart C of Part 268

EPA estimates that none of the new land disposal facilities submitting a Part B permit application during the period of this ICR will submit an extension request or petition under this section.

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

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity Legal $93.97/hr	Manager $71.49/hr	Technica $46.79/hr	Clerical $24.48/hr.	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
OTHER PART B REQUIREMENTS (270.14(b)(19), (21))											
Topographical Map (270.14(b)(19))											
Read the regulations	0.00	0.00	0.50	0.00	0.50	$23.40	$0.00	$0.00	44	22.00	$1,029.38
Collect the necessary information	0.00	0.00	10.00	0.25	10.25	$474.02	$0.00	$0.00	44	451.00	$20,856.88
Develop and submit the map	0.00	0.00	1.00	0.25	1.25	$52.91	$0.00	$20.00	44	55.00	$3,208.04
Case-by-Case Extensions and Petitions to Allow Land Disposal of a Waste Prohibited Under Subpart C of Part 268 (270.14(b)(21))											
Read the regulations	0.00	0.00	0.15	0.00	0.15	$7.02	$0.00	$0.00	0	0.00	$0.00
Prepare and submit copy of the notice of appro	0.00	0.10	0.40	0.10	0.60	$28.31	$0.00	$3.00	0	0.00	$0.00
Total	0.00	varies	varies	varies	varies	varies	varies	varies	varies	528.00	$25,094.30