6(b) ESTIMATING AGENCY BURDEN AND COST

EPA estimates annual Agency burden hours and costs associated with all of the requirements covered in this ICR in Exhibit 2. EPA believes that the Headquarters, Regional, and State offices will be involved in these activities. Based on a GS pay schedule, EPA estimates an average hourly labor cost of $60.42 for legal staff (GS-15, Step 5), $38.35 for managerial staff (GS-13, Step 1), $26.91 for technical staff (GS-11, Step 1), and $16.36 for clerical staff (GS-6, Step 1). To derive these hourly estimates, EPA divided the annual compensation estimates by 2,080, which is the number of hours in the Federal work-year, and then multiplied the hourly rates by the standard government overhead factor of 1.6. As shown in Exhibit 6, EPA estimates that the annual Agency burden for all activities covered in this ICR is approximately 39,642 hours, at an annual cost of $1,236,000.

6(c) BOTTOM LINE BURDEN, HOURS AND COSTS

Exhibits 4 and 6 show the aggregate annual burden and cost to respondents and the government, respectively, for all information collection requirements covered in this ICR. The bottom line burden to respondents over three years is 375,081 hours, with a cost of $44,958,453. The bottom line burden to the Agency over three years is 118,926 hours, at a cost of $3,708,000.

EXHIBIT 4
TOTAL ANNUAL RESPONDENT BURDEN AND COST

	Total Hours per Year	Total Capital per Year	Total O&M per Year	Total Labor Cost per Year	Total Cost per Year
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS					
Releases from Regulated Units	6	$0	$0	$281	$281
Specific Unit Requirements	504	$10	$116	$22,943	$23,069
CONTENTS OF THE PART B APPLICATION					
Legal Review	14,400	$0	$0	$1,353,168	$1,353,168
General Information	0	$0	$0	$0	
Permit Application	61	$5	$15	$3,239	$3,259
General Requirements	4	$0	$1	$218	$219
General Facility Standards	23,800	$22,144	$651,832	$1,100,434	$1,774,410
Financial Assurance	2,822	$0	$888	$111,702	$112,590
Other Part B Requirements	528	$0	$880	$24,214	$25,094
Ground-Water Protection	19,801	$212	$2,245,369	$928,787	$3,174,368
Solid Waste Management Units	1,541	$165,033	$110,099	$70,654	$345,786
Specific Part B Information Requirements	43,433	$0	$4,813,662	$2,034,499	$6,848,161
Schedules of Compliance	29	$0	$7	$1,621	$1,628
PERMIT MODIFICATIONS AND SPECIAL PERMITS					
Permit Modifications	13,260	$0	$399,105	$671,379	$1,070,484
Expiration and Continuation of Permits	4,510	$0	$120	$225,613	$225,733
Special Forms of Permits	528	$0	$3,925	$23,978	$27,903
Interim Status	0	$0	$0	$0	$0
Total	125,027	$187,404	$8,226,019	$6,572,728	$14,986,151

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity: Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.	Agency Hours/ Year	Labor Cost/ Year	Number of Respondents/ Activity	Total Hours per Year	Total Cost per Year
RELEASES FROM REGULATED UNITS (264.90)									
Review and evaluate demonstrations	0.00	0.00	5.00	0.00	5.00	$134.55	0	0.00	$0.00
Review certification	0.00	0.00	0.20	0.00	0.20	$5.38	0	0.00	$0.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	0	0.00	$0.00
Total	0.00	0.00	varies	varies	varies	varies	varies	0.00	$0.00
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS (264.193 - 264.344)									
Tank Systems (264.193)									
Review the information submitted	0.00	0.00	5.00	0.00	5.00	$134.55	5	25.00	$672.75
	0.00	0.00	0.00	0.10	0.10	$1.64	5	0.50	$8.18
Subtotal	0.00	0.00	5.00	0.10	5.10	$136.19	varies	25.50	$680.93
Surface Impoundments (264.221)									
Review demonstrations for exemption	0.00	0.00	5.00	0.00	5.00	$134.55	0	0.00	$0.00
Review demonstration for adequacy of leak detection	0.00	0.00	5.00	0.00	5.00	$134.55	1	5.00	$134.55
Review demonstrations for waiver	0.00	0.00	3.00	0.00	3.00	$80.73	1	3.00	$80.73
Review demonstration for replacement unit exemption	0.00	0.00	3.00	0.00	3.00	$80.73	1	3.00	$80.73
Enter information into data base	0.00	0.00	0.00	0.10	0.10	$1.64	2	0.20	$3.27
Subtotal	0.00	0.00	varies	varies	varies	varies	varies	11.20	$299.28
Waste Piles (264.251)									
Review and evaluate demonstrations	0.00	0.00	5.00	0.00	5.00	$134.55	2	10.00	$269.10
Enter information into a database	0.00	0.00	0.00	0.10	0.10	$1.64	1	0.10	$1.64
Subtotal	0.00	0.00	5.00	0.10	5.10	$136.19	varies	10.10	$270.74
Land Treatment (264.272)									
Review demonstrations	0.00	0.00	5.00	0.00	5.00	$134.55	0	0.00	$0.00
Enter information into a database	0.00	0.00	0.00	0.10	0.10	$1.64	0	0.00	$0.00
Subtotal	0.00	0.00	5.00	0.10	5.10	varies	varies	0.00	$0.00
Landfills (264.301)									
Review demonstration for adequacy of leak detection	0.00	0.00	5.00	0.00	5.00	$134.55	2	10.00	$269.10
Review and evaluate demonstrations for exemption	0.00	0.00	5.00	0.00	5.00	$134.55	1	5.00	$134.55
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	2	0.20	$3.27
Subtotal	0.00	0.00	varies	varies	varies	varies	varies	15.20	406.922

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Agency Hours/ Year	Labor Cost/ Year	Number of Res- pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.					
Incinerators (264.344)									
Review demonstrations	0.00	0.00	5.00	0.00	5.00	$134.55	0	0.00	$0.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	0	0.00	$0.00
Subtotal	0.00	0.00	5.00	0.10	5.10	$136.19	varies	0.00	$0.00
Total	0.00	0.00	varies	varies	varies	varies	varies	62.00	$1,657.87

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Agency Hours/ Year	Labor Cost/ Year	Number of Respondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.					
GENERAL INFORMATION (270.1)									
Review and approve petitions	0.00	0.50	3.00	0.00	3.50	$99.91	0	0.00	$0.00
Enter information into a data base	0.00	0.00	0.00	0.50	0.50	$8.18	0	0.00	$0.00
Total	0.00	0.50	3.00	0.50	4.00	$108.09	0	0.00	$0.00
PERMIT APPLICATION (270.10(j))									
Review required data	0.00	0.00	3.00	0.00	3.00	$80.73	5	15.00	$403.65
Enter information into a data base	0.00	0.00	0.00	0.50	0.50	$8.18	5	2.50	$40.90
Total	0.00	0.00	3.00	0.50	3.50	$88.91	5	17.50	$444.55
GENERAL REQUIREMENTS (270.14(a))									
Review and approve demonstrations	0.00	0.25	0.75	0.00	1.00	$29.77	0	0.40	$11.91
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	0	0.04	$0.65
Total	0.00	0.25	0.75	0.10	1.10	$31.41	0	0.44	$12.56
GENERAL FACILITY STANDARDS (270.14(b) (1)-(14))									
Review required information	0.00	0.00	40.00	0.00	40.00	$1,076.40	144	5,760.00	$155,001.60
Enter information into a data base	0.00	0.00	0.00	3.00	3.00	$49.08	144	432.00	$7,067.52
Total	0.00	0.00	40.00	3.00	43.00	$1,125.48	144	6,192.00	$162,069.12
FINANCIAL ASSURANCE (270.14(b) (15)-(16))									
Review financial estimates and instruments	4.00	1.00	16.00	0.00	21.00	$710.59	144	3,024.00	$102,324.96
Enter information into a data base	0.00	0.00	0.00	0.25	0.25	$4.09	144	36.00	$588.96
Total	4.00	1.00	16.00	0.25	21.25	$714.68	144	3,060.00	$102,913.92

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Agency Hours/ Year	Labor Cost/ Year	Number of Res-pondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.					
OTHER PART B REQUIREMENTS (270.14(b) (19),(21))									
Review topographical map	0.00	0.00	2.00	0.00	2.00	$53.82	44	88.00	$2,368.08
Review approved land disposal extensions/petitions	0.00	0.00	1.00	0.00	1.00	$26.91	0	0.00	$0.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	44	4.40	$71.98
Total	0.00	0.00	varies	varies	varies	varies	varies	92.40	$2,440.06
GROUND-WATER PROTECTION (270.14(c) (1)-(8))									
Review ground-water monitoring program information	0.00	0.00	40.00	0.00	40.00	$1,076.40	106	4,240.00	$114,098.40
Total	0.00	0.00	40.00	0.00	40.00	$1,076.40	106	4,240.00	$114,098.40

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity				Agency Hours/ Year	Labor Cost/ Year	Number of Respondents/ Activity	Total Hours per Year	Total Cost per Year
	Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.					
SOLID WASTE MANAGEMENT UNITS (270.14(d))									
Review all required information	0.00	0.00	24.00	0.00	24.00	$645.84	33	792.00	$21,312.72
Enter information into a data base	0.00	0.00	0.00	0.50	0.50	$8.18	33	16.50	$269.94
Review information submitted for a RCRA Facility Assessment	0.00	0.00	4.00	0.50	4.50	$115.82	33	148.50	$3,822.06
Total	0.00	0.00	28.00	1.00	29.00	$769.84	33	957.00	$25,404.72

EXHIBIT 5
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours per Respondent/Activity: Legal $60.42/hr.	Manager $38.35/hr.	Technical $26.91/hr.	Clerical $16.36/hr.	Agency Hours/ Year	Labor Cost/ Year	Number of Res-pondents/ Activity	Total Hours per Year	Total Cost per Year
SPECIFIC PART B INFORMATION REQUIREMENTS (270.15 - .21, 270.23 - .25)									
Containers (270.15)									
Review the submitted data	0.00	0.00	6.00	0.00	6.00	$161.46	91	546.00	$14,692.86
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	91	9.10	$148.88
Tank Systems (270.16)									
Review the submitted data	0.00	0.00	16.00	0.00	16.00	$430.56	104	1,664.00	$44,778.24
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	104	10.40	$170.14
Surface Impoundments (270.17)									
Review the submitted data	0.00	0.00	40.00	0.00	40.00	$1,076.40	2	80.00	$2,152.80
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	2	0.20	$3.27
Waste Piles (270.18)									
Review the submitted data	0.00	0.00	40.00	0.00	40.00	$1,076.40	1	40.00	$1,076.40
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	1	0.10	$1.64
Incinerators (270.19)									
Review the submitted data	0.00	0.00	80.00	0.00	80.00	$2,152.80	11	880.00	$23,680.80
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	11	1.10	$18.00
Land Treatment (270.20)									
Review the submitted data	0.00	0.00	40.00	0.00	40.00	$1,076.40	37	1,480.00	$39,826.80
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	37	3.70	$60.53
Landfills (270.21)									
Review the submitted data	0.00	0.00	40.00	0.00	40.00	$1,076.40	97	3,880.00	$104,410.80
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	97	9.70	$158.69
Miscellaneous Units (270.23)									
Review the submitted data	0.00	0.00	60.00	0.00	60.00	$1,614.60	6	360.00	$9,687.60
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	6	0.60	$9.82
Process Vents and Equipment Leaks (270.24 & .25)									
Review the submitted data	0.00	0.00	6.00	0.00	6.00	$161.46	60	360.00	$9,687.60
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	60	6.00	$98.16
Drip pads (270.26)									
Review the submitted data	0.00	0.00	6.00	0.00	6.00	$161.46	0	0.00	$0.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	0	0.00	$0.00
Total	0.00	0.00	varies	varies	varies	varies	varies	9,330.90	$250,663.02