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.					
SCHEDULE OF COMPLIANCE (270.33)									
Review the submitted data	0.00	0.25	1.00	0.00	1.25	$36.50	2	2.50	$73.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	2	0.20	$3.27
Total	0.00	0.25	1.00	0.10	1.35	$38.13	2	2.70	$76.27

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
PERMIT MODIFICATIONS (270.40 - .42)									
Transfer of Permits (270.40(b))									
Review written agreements	1.00	0.50	1.00	0.00	2.50	$106.51	10	25.00	$1,065.05
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	10	1.00	$16.36
Permit Modifications at the Request of the Agency (270.41)									
Review the modification	20.00	1.00	40.00	0.00	61.00	$2,323.15	173	10,546.22	$401,646.82
Review the proof of public notice	0.00	0.25	1.00	0.00	1.25	$36.50	173	216.11	$6,310.01
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	173	17.29	$282.85
Permit Modifications at the Request of the Permittee (270.42(a)-(d))									
Review the Class 1 modification	0.00	0.25	1.00	0.00	1.25	$36.50	173	216.11	$6,310.01
Review the Class 2 or Class 3 modification	20.00	1.00	40.00	0.00	61.00	$2,323.15	49	3,009.33	$114,608.73
Review the proof of public notice	0.00	0.25	1.00	0.00	1.25	$36.50	173	216.11	$6,310.01
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	173	17.29	$282.85
Review information submitted in support of a request for a modification classification, and make a determination (270.42(d))	0.00	0.25	1.00	0.00	1.25	$36.50	173	216.11	$6,310.01
Temporary Authorizations (270.42(e))									
Review temporary authorization requests	0.00	1.00	6.00	0.00	7.00	$199.81	12	84.00	$2,397.72
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	12	1.20	$19.63
CAMU Requirements									
Review information for designation of a CAMU	0.00	0.25	1.00	0.10	1.35	$38.13	0	0.00	$0.00
Total	varies	varies	varies	varies	varies	varies	varies	14,565.78	$545,560.06
EXPIRATION AND CONTINUATION OF PERMITS (270.50 - 270.51)									
Review the permit application	0.00	1.00	20.00	0.00	21.00	$576.55	40	840.00	$23,062.00
Enter information into a data base	0.00	0.00	0.00	0.10	0.10	$1.64	40	4.00	$65.44
Total	0.00	1.00	20.00	0.10	21.10	$578.19	40	844.00	$23,127.44

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.					
SPECIAL FORMS OF PERMITS (270.61 - .65)									
Emergency Permits (270.61)									
Issue an emergency permit	0.00	2.00	24.00	2.00	28.00	$755.26	0	0.00	$0.00
Hazardous Waste Incinerator Permits (270.62)									
Review request to extend the operational period	0.00	0.50	1.00	0.25	1.75	$50.18	11	19.25	$551.93
Review required statements and certifications	0.00	0.00	9.00	0.00	9.00	$242.19	11	99.00	$2,664.09
Enter information into a data base	0.00	0.00	0.00	0.01	0.01	$0.16	11	0.11	$1.80
Permits for Land Treatment Demonstrations Using Field Test or Laboratory Analyses (270.63)									
Review certifications	0.00	0.00	9.00	0.00	9.00	$242.19	0	0.00	$0.00
Review data collected	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
Research, Development, and Demonstration (RD&D) Permits									
Review application for a RD&D permit	0.00	1.00	50.00	0.00	51.00	$1,383.85	3	153.00	$4,151.55
Issue or deny a permit	0.00	0.50	1.00	0.50	2.00	$54.27	3	6.00	$162.80
Total	varies	varies	varies	varies	varies	varies	varies	277.36	$7,532.16

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.					
INTERIM STATUS (270.70 - .73)									
Termination of Interim Status (270.73)									
Review certification that an interim status facility is in compliance with ground-water monitoring and financial responsibility requirements	0.00	0.50	10.00	0.00	10.50	$288.28	0	0.00	$0.00
Total	0.00	0.50	10.00	0.00	10.50	$288.28	0	0.00	$0.00

EXHIBIT 6
TOTAL ANNUAL AGENCY BURDEN AND COSTS
FY 1993 - 1995

EXHIBITS	Total Hours per Year	Total Cost per Year
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS		
Releases from Regulated Units	0	$0
Demonstrations and Exemptions from Requirements	62	$1,658
CONTENTS OF THE PART B APPLICATION		
General Information	0	$0
Permit Application	18	$445
General Requirements	0	$13
General Facility Standards	6,192	$162,069
Financial Assurance	3,060	$102,914
Other Part B Requirements	92	$2,440
Ground-Water Protection	4,240	$114,098
Solid Waste Management Units	957	$25,405
Specific Part B Information Requirements	9,331	$250,663
Schedules of Compliance	3	$76
PERMIT MODIFICATIONS AND SPECIAL PERMITS		
Permit Modifications	14,566	$545,560
Expiration and Continuation of Permits	844	$23,127
Special Forms of Permits	277	$7,532
Interim Status	0	$0
Total	39,642	$1,236,000

6(d) REASONS FOR CHANGE IN BURDEN

This ICR is a description of the total respondent burden for all information collection requirements covered in this ICR. The total respondent burden has changed from the previous ICR for a number of reasons. In developing burden estimates for this ICR, EPA conducted consultations with members of the regulated community who provided revised burden estimates for each information collection requirement in this ICR. EPA also revised its respondent universe based on updated RCRIS data. In addition, EPA revised the labor rates for the regulated community. Capital and O&M costs were also included.

While the RCRA program and regulations pertaining to the Part B requirements and the information collection activities undertaken by the respondents have not changed, EPA's estimates of the associated reporting and recordkeeping burden (in hours) per respondent has decreased and the estimates associated with total cost (including capital and O&M) have decreased. EPA believes that the burden reflects a more comprehensive and, therefore, a more accurate portrait of the existing burden on the regulated community.

6(e) BURDEN STATEMENT

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA’s regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Exhibit 7 displays the average respondent burden for the information collection requirements discussed in this ICR.

For demonstrations under §264.90 (i.e., releases from regulated units), the public reporting burden is estimated to be zero hours per year, with a recordkeeping burden of zero hours per year. For demonstrations and exemptions from requirements, the public reporting burden for the information collection requirements is estimated to average 2.4 hours per year, and the recordkeeping burden is estimated to be one hours per respondent per year.

For legal review, no burden is estimated for reporting, while the average recordkeeping burden is estimated to be 100 hours per year. No recordkeeping or reporting burden is estimated for general information requirements at §270.1.

For permit application information required under §270.10(j), the average public reporting burden is estimated to be 10 hours per year, with an average recordkeeping burden of 2.1 hours per year.

For demonstrations submitted under §270.14(a), the average public reporting burden is estimated to be six minutes per year (no recordkeeping burden is anticipated).

For general facility standards, the public reporting burden for the information collection requirements is estimated to average 486 hours per respondent per year. The recordkeeping burden is estimated to be nine hours per respondent per year.

For financial assurance, the public reporting burden for the information collection requirements is estimated to average 19 hours per respondent per year. The recordkeeping burden is estimated to average three hours.

For other Part B requirements, the public reporting burden for the information collection requirements is estimated to average 11.5 hours per respondent per year. The recordkeeping burden is estimated to average .5 hours.

For ground-water protection, the public reporting burden for the information collection requirements is estimated to average 237 hours per respondent per year. The recordkeeping burden is estimated to average 5.4 hours per respondent per year.

For solid waste management units, the public reporting burden for the information collection requirements is estimated to average 10.5 hours per respondent per year. The recordkeeping burden is estimated to average 10.5 hours.

For specific unit requirements in sections 270.15 through 270.26, the public reporting and recordkeeping burdens for the information collection requirements vary according to the type of unit. The total average reporting burden for specific unit requirements is estimated to be 1,737 hours per respondent per year. The recordkeeping burden is estimated to average 7.1 hours per respondent per year.

For schedules of compliance, the average public reporting burden is estimated to be 12 minutes per respondent per year. The recordkeeping burden is estimated to average 30 minutes per respondent per year.

For permit modifications, the average public reporting burden is estimated to be 2.4 hours per respondent per year. The recordkeeping burden is estimated to average 12 minutes per respondent per year.

For renewal of permits, the average public reporting burden is estimated to be close to one hour per respondent per year. The recordkeeping burden is estimated to average zero hours per respondent per year.

For special forms of permits, the average public reporting burden is estimated to be 99 hours per respondent per year. The recordkeeping burden is estimated to average one hour per respondent per year.

For interim status, the public reporting burden for the information collection requirements is estimated to average zero hours per respondent per year. The recordkeeping burden is estimated to average zero hours.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the sue of automated collection techniques, to the Director, OPPE Regulatory information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and the OMB control number in any correspondence.

EXHIBIT 7
TOTAL AVERAGE RESPONDENT BURDEN

EXHIBIT	Average Hourly Reporting Burden	Average Hourly Recordkeeping Burden
DEMONSTRATIONS AND EXEMPTIONS FROM REQUIREMENTS		
Releases from Regulated Units	0.0	0.0
Demonstrations and Exemptions from Requirements	2.4	1.0
CONTENTS OF THE PART B APPLICATION		
Legal Review	0.0	100
General Information	0.0	0.0
Permit Application	10.0	2.1
General Requirements	0.1	0.0
General Facility Standards	486.2	9.0
Financial Assurance	19.0	3.0
Other Part B Requirements	11.5	0.5
Ground-Water Protection	236.9	5.4
Solid Waste Management Units	10.5	10.5
Specific Part B Information Requirements	1736.8	7.1
Schedules of Compliance	0.2	0.5
PERMIT MODIFICATIONS AND SPECIAL PERMITS		
Permit Modifications	2.4	0.2
Expiration and Continuation of Permits	0.9	0.0
Special Forms of Permits	99.3	1.0
Interim-Status	0.0	0.0