

Changes to Form A and Form R as a result of the TRI Final Rule (TRI-2005-0073)

The TRI final rule to expand Form A eligibility provides **overall** burden reduction of approximately 123,404 hours based on a decrease in the Form R burden that outweighs the increase in the Form A burden (*i.e.*, 402,298 hours of Form R burden reduction minus 279,495 hours of Form A burden increase).

Burden hour decreases to Form R: 402,298. This figure is based on the estimated 9,501 non-PBT Form Rs converting to Form A and 2,360 PBT Form Rs converting to Form A. Each non-PBT Form R response is estimated to average 29.6 hours and each PBT Form R response is estimated to average 51.3 hours. $((9,501 \times 29.6) + (2,360 \times 51.3) = 402,298)$.

Burden hour increases to Form A: 279,495. This figure is based on the estimated 9,501 non-PBT Form Rs converting to Form A and 2,360 PBT Form Rs converting to Form A. Each non-PBT Form A response is estimated to average 20.5 hours and each PBT Form A response is estimated to average 35.9 hours. $((9,501 \times 20.5) + (2,360 \times 35.9) = 279,495)$.

EPA further recognizes that there may be some insignificant number of Form As (approximately 50) that may become newly ineligible for Form A under this final rule as a result of including Section 8.8 amounts (*e.g.*, catastrophic events) in Form A threshold determinations; thus, causing these newly ineligible Form As to become Form Rs. For more information about new ineligibility for Form A as a result of this final rule refer to the preamble to the final rule and Chapter 6 of the Economic Analysis supporting this rule.