

**Supporting Statement  
For  
Information Collection Request (ICR)  
801.16**

**Requirements for Generators, Transporters,  
& Waste Management Facilities  
Under the  
RCRA Hazardous Waste Manifest System**

**5 May 2008**

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1A. Title and Number of The Information Collection**

"Requirements for Generators, Transporters, and Hazardous Waste Management Facilities Under the RCRA Hazardous Waste Manifest System," OMB Control No. 2050-0039, EPA ICR number 801.16

### **1B. Short Characterization**

EPA adopted the hazardous waste manifest system pursuant to its directive under the Resource Conservation and Recovery Act (RCRA), as amended, to protect human health and the environment. RCRA establishes a national program to improve hazardous waste management by regulating hazardous wastes from "cradle to grave." An essential part of this management program is the manifest system. According to section 3002(a)(5) of RCRA, EPA must "...establish requirements respecting...use of a manifest system and any other reasonable means necessary to assure that all such hazardous waste generated is designated for treatment, storage, or disposal, and arrives at treatment, storage, or disposal facilities...for which a permit has been issued..."

The manifest is a control and transport document that accompanies the waste from its generation site to its treatment, storage, or disposal site. Among other things, the manifest lists the wastes that are being shipped and the treatment, storage, or disposal facility (TSDF) to which the wastes are bound. The term "manifest system" refers to the overall set of requirements for the use of the manifest.

These requirements are intended to ensure that hazardous waste designated for delivery to an off-site TSDF actually reaches its destination. Thus, the manifest system serves as a self-enforcing mechanism that requires generators, transporters, and owner/operators of TSDFs to participate in an active hazardous waste tracking system. This system does not ordinarily involve intervention on the part of EPA unless hazardous wastes do not reach their designated point of disposal within a specified timeframe. In most cases, RCRA-authorized States operate the manifest system, and requirements may vary among authorized States, including submission of manifests to States for routine shipments.

The critical components of the manifest system include the information required on the manifest itself, the transmittal of manifest copies to specified parties, the submission of exception, discrepancy, and unmanifested waste reports to EPA, and recordkeeping requirements. Each of these components assists in tracking the waste and helps the Agency in reviewing whether hazardous waste shipments have been handled properly. The manifest, by incorporating Department of Transportation requirements applicable to shipping papers, also serves as an important safety tool. In the event of an accident during transport or delivery, information on the manifest, such as the identification of the waste's hazard class, can be used to help response teams determine appropriate response actions.

## **2. NEED, AUTHORITY & USE FOR THE INFORMATION**

### **2A. Need & Authority to Collect Information**

This ICR 801.16 renews the existing information collection (ICR nr. 801.15) for a three-year extension, thereby superseding and replacing the existing ICR.

EPA's authority to require use of a hazardous waste manifest system stems primarily from Section 3002(a)(5) of the 1976 Resource Conservation and Recovery Act (RCRA) (See also RCRA Sections 3003(a)(3) and 3004.) Regulations are found in 40 CFR 262 (registrant organizations and generators), 40 CFR 263 (transporters), and 40 CFR 264 & 265 (TSDFs). Section 3002(a)(5) of RCRA, as amended, directs the US Environmental Protection Agency (EPA) to:

*"...establish requirements respecting...use of a manifest system and any other reasonable means necessary to assure that all such hazardous waste generated is designated for treatment, storage,*

*or disposal, and arrives at treatment, storage, or disposal facilities...for which a permit has been issued..."*

Under this authority, USEPA published regulations for a manifest system on February 26, 1980 (45 Federal Register 12724).<sup>1</sup> USEPA established requirements for manifest completion, transmittal, and recordkeeping for hazardous waste generators at 40 CFR 262 subpart B, for transporters at 40 CFR 263 subpart B, and for treatment, storage, and disposal facilities (TSDFs) at 40 CFR 264 & 265 subpart E. In 1984, USEPA published the Uniform Hazardous Waste Manifest, which consisted of a Federally-required portion (i.e., Federally required data elements in Blocks 1-20) and a State-optional portion (i.e., Blocks A-K on the manifest reserved for optional State use).<sup>2</sup>

In 2005, USEPA finalized modifications to the RCRA manifest system to minimize unnecessary paperwork burden on hazardous waste handlers resulting from variable State manifest data requirements, and to address other stakeholder-requested improvements to the manifest system. USEPA proposed these modifications on 22 May 2001 (<http://www.epa.gov/epaoswer/hazwaste/gener/manifest/mods.htm>). Specifically, USEPA has eliminated the State-optional blocks from EPA's RCRA manifest form (EPA Form 8700-22 & 8700-22A continuation sheet), and made the manifest form completely uniform. USEPA has also established special tracking procedures for international hazardous waste shipments (i.e. exports/ imports), rejected waste loads, and waste container residues.

In addition, USEPA has established a RCRA manifest printing registry process at 40 CFR 262.21. Under these regulations, any organization (e.g., waste handler, commercial printer, State agency) can register with USEPA to print RCRA manifests. Members of the public can only obtain blank manifest forms from these registered sources

## **2B. Practical Utility & Users of the Information**

### (a) USEPA Registry of Approved Manifest Printers

In regard to the USEPA registry, USEPA will review the initial application from each registrant to:

- (1) ascertain basic organizational information (e.g., name and address of organization);
- (2) determine if the registrant's proposed suffix is unique;
- (3) evaluate the qualifications of the printing company;
- (4) understand how the registrant intends to print, use, and distribute the forms; and
- (5) review the registrant's proposed controls, and establish additional controls as needed, to ensure that the registrant tightly controls its tracking numbers and prints a quality manifest.

EPA will review the registrant's form samples to:

- (1) evaluate the competence of the registrant to print the manifest;
- (2) evaluate if the registrant's form satisfies the print requirements of 40 CFR 262.21(f) (e.g., by visually examining the samples and writing on them to see if they convey handwritten imprints legibly from copy to copy, as required under 40 CFR 262.21(f)(5)); and
- (3) ascertain the paper type, paper weight, ink color of the instructions, and binding method of the registrant's form.

If the registrant is approved to print the form, the registrant must print the form according to the paper type, paper weight, ink color, and binding method of its approved samples.

### Manifest Procedures

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<sup>1</sup> USEPA intended the manifest to serve three primary purposes: (1) to serve as a tracking device which creates clear lines of accountability among the participants in the hazardous waste systems; (2) to serve, together with other USEPA and USDOT requirements, to protect human health and the environment during the transportation of hazardous waste by providing information on the waste to persons handling the waste and to emergency response personnel; and (3) to provide the principal basis for USEPA's recordkeeping and reporting requirements.

<sup>2</sup> Pursuant to the 1995 Paperwork Reduction Act, this ICR examines only Federal information collection requirements. It does not address State requirements (e.g., State-optional elements of the manifest, or manifest burden associated with state-only regulated hazardous wastes).

In regard to the manifest procedures, generators, transporters, and designated TSDFs handling hazardous waste are required to complete the data requirements for manifests and other reports primarily to:

- (1) track each shipment of hazardous waste from the generator to a designated facility;
- (2) provide information requirements sufficient to allow the use of a manifest in lieu of a USDOT shipping paper or bill of lading, thereby reducing the duplication of paperwork to the regulated community;
- (3) provide information to transporters and waste management facility workers on the hazardous nature of the waste;
- (4) inform emergency response teams of the waste's hazard in the event of an accident, spill, or leak; and
- (5) ensure that shipments of hazardous waste are managed properly and delivered to their designated facilities.

Although the generators, transporters, TSDFs, and emergency response teams (in the case of accidents) are the primary users of these records, USEPA may review these documents during a facility inspection to make sure proper records are being kept and regulations are complied with. USEPA also reviews and responds to exception reports, discrepancy reports, and unmanifested waste reports.

### **3. NONDUPLICATION, CONSULTATIONS & OTHER COLLECTION CRITERIA**

#### **3A. Nonduplication**

No document identical or similar in purpose to the manifest is required by the Federal government for the shipment of RCRA hazardous waste. Although a USDOT hazardous materials shipping paper<sup>3</sup> contains most of the information contained on the manifest, it does not appear to be legally sufficient to track hazardous waste shipments from the generator to the designated facility (i.e. from "cradle-to-grave"). For example, USDOT's shipping paper does not require USEPA ID numbers and signatures of the transporters and all other chain-of-custody entities involved in shipping or handling the hazardous waste. USEPA requires such signatures and identification numbers on the manifest to ensure accountability of each waste handler during shipment of the hazardous waste. Also, since USEPA coordinated the development of the manifest with USDOT, the manifest form can be used as a USDOT shipping paper, thus eliminating the need for the transporter to carry both documents. Furthermore, the manifest form was developed as a means of standardizing the information requirements, both Federal and State, thereby eliminating the need for a generator to complete and a transporter to carry multiple manifests for interstate shipments.

#### **3B. Public Notice**

In compliance with the Paperwork Reduction Act of 1995, USEPA issued a public notice in the Federal Register on February 5, 2008 (73 FR 6721), soliciting public comments for a 60-day period ending April 7, 2008. No comments were received.

#### **3C. Consultations**

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<sup>3</sup> Any person who offers a hazardous material for transportation in commerce must describe the hazardous material on a USDOT shipping paper in the manner required in 49 CFR 172 subpart C. A shipping paper includes "a shipping order, bill of lading, manifest or other shipping document serving a similar purpose and containing the information required by 49 CFR 172.202, 172.203 & 172.204." 49 CFR 171.8 provides a definition of "shipping paper". 49 CFR 172.205(h) states that an USEPA RCRA hazardous waste manifest (EPA Form 8700-22) "may be used as the shipping paper" if it contains all the information required by 49 CFR 172 subpart C.

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### **3D. Effects of Less Frequent Collection**

USEPA requires registrants to submit an initial application to USEPA under 40 CFR 262.21(b) and form samples and descriptions under 40 CFR 262.21(d). These are one-time submittals. Registrants need not submit any other application information under 40 CFR 262.21(b) or (d), except if USEPA requests changes or has questions. If USEPA did not receive these submittals, USEPA would not be able to determine if the registrant:

- will tightly control its manifest tracking numbers to ensure that each number pre-printed on the manifest is unique;
- will use appropriate quality control measures to print a quality manifest consistently; and
- is competent to print the manifest.

USEPA also would not have any way to determine if the registrant's manifest satisfies the print requirements at 40 CFR 262.21(f). USEPA needs to visually examine the samples (e.g., to determine if it has acceptable copy-to-copy registration; if the instructions on the back of the copies do not bleed through; if the binding method is adequate; if the paper weight and paper type are adequate to convey handwritten imprints copy to copy).

An approved registrant need not re-submit information to the Agency, unless it:

- updates its initial application approved under 40 CFR 262.21(c)
- wants a new suffix
- seeks to change the paper type, paper weight, ink color of the instructions, or binding method of its approved forms
- seeks to change the printing company.

In regard to updates to the application, USEPA needs to learn about any updates. For example, if the name or address of the registrant changes, USEPA must be informed of this. If the registrant updates its quality control methods, USEPA must be apprised so it can evaluate the updated methods and require modifications if needed. Less frequent information submittal would not allow USEPA to learn about these important updates and ensure they are appropriate.

In regard to requests for a new suffix, USEPA needs to evaluate the registrant's proposed new suffix to ensure it is unique. Each registrant must generate its unique manifest tracking numbers using its unique suffix. If registrants do not submit a request to USEPA for a new suffix, USEPA will not have a way to ensure that a registrant's new suffix is unique.

In regard to changes to the paper type, paper weight, ink color, or binding method or changes to the approved printer, USEPA must evaluate the form to determine if it satisfies the print requirements of 40 CFR 262.21(f). After they are approved to print the form, for example, some registrants might seek to change their paper type to a lesser grade, which may not effectively convey impressions copy to copy. Less frequent information submittal would not allow USEPA to evaluate changes to these key aspects of the registrant's form.

In regard to the manifest requirements, USEPA does not collect manifests under normal situations, but requires instead preparation of the manifest, use of the manifest during transportation, and recordkeeping of the manifests for a 3-year period. Manifests are only collected by USEPA either to accompany an exception or discrepancy report or in the case of an export. In addition, since the manifest is required to accompany all shipments of hazardous waste when shipped off site by the generator, less frequent preparation is not possible. The frequency of off-site shipment is determined by the generator and depends on:

- the quantities of waste to be shipped as they impact the economies of shipment
- transporter scheduling
- the applicable regulatory requirements.

The present system gives the generator the opportunity to maximize the economies of off-site shipments by selecting a shipping frequency that is appropriate for the rate of waste generation. Further, by requiring a

manifest to accompany each shipment, USEPA ensures the manifest is available in the case of a discharge of hazardous waste during transportation. Information on the manifest could be useful to emergency response personnel responding to the scene. In this regard, less frequent manifesting could result in a less expedient or protective response to the release.

Note, however, that USEPA provides a manifest exemption at 40 CFR 262.20(e) and (f) for specified types of shipments, as appropriate. Under 40 CFR 262.20(e), small quantity generators (SQGs), or those generators who generate between 100 and 1,000 kilograms/month of hazardous waste, can be exempt from manifest requirements if the waste is reclaimed under a contractual agreement that specifies the type of waste and frequency of shipments; the transporting vehicle is owned and operated by the reclaimer; and the generator retains a copy of the reclamation agreement for three years after termination or expiration of the agreement. Under 40 CFR 262.20(f), generators who transport hazardous wastes on a public or private right-of-way within or along the border of contiguous property under the control of the same person, even if such contiguous property is divided by a public or private right-of-way, are exempt from manifesting requirements.

### **3E. Confidentiality**

Section 3007(b) of RCRA and 40 CFR 2 subpart B, which define USEPA's general policy on the public disclosure of information, contain provisions for confidentiality. However, the Agency does not anticipate that businesses will assert a claim of confidentiality covering all or part of the information collection requirements covered in this ICR. If such a claim was asserted, USEPA must and will manage that information in accordance with the regulations cited above.

### **3F. Sensitive Questions**

No questions of a sensitive nature are included in any of the information collection requirements.

## **4. UNIVERSE OF AFFECTED RESPONDENTS**

### **4A. Economic Sectors & Industries Affected**

Following are the Standard Industrial Classification (SIC) codes and the North American Industry Classification System (NAICS) codes of facilities most likely subject to the requirements in this ICR.

Industrial Sector	SIC Code(s)	NAICS Code(s)
Agriculture, Forestry, Fishing, and Hunting	01-09	11
Mining	10-14	21
Utilities	49	22
Construction	15-17	23
Manufacturing	20-39	31-33
Wholesale Trade	50-51	42
Retail Trade	52-59	44-45
Transportation and Warehousing	40-47	48-49
Information	27, 48, 73 (partial), 78	51
Waste Management & Remediation Services	1799, 4953, 4959	562
Public Administration	91-97	92

#### 4B. Types & Count of Entities Affected

There are basically five categories of entities affected by the respondent activities required for each information collection element discussed in this ICR:

- Registrant organizations (manifest printer registry)
- Hazardous waste generators which ship hazardous waste offsite
- Hazardous waste transporters
- Hazardous waste TSDFs (treatment, storage, disposal facilities) which receive offsite shipments
- Agency (i.e. Federal RCRA-authorized state government programs, and USEPA regional offices, and USEPA headquarters)

##### (4B.1) Registrant Organizations

In the previously approved information collection, USEPA estimated 40 entities would apply to USEPA's manifest printing registry during the first two years of operation. That estimated included roughly 20 States that previously printed manifests and 20 TSDFs or large generators. In addition, USEPA used its best judgment to estimate that the Agency will receive two new applications in the third year covered by this ICR. As displayed in Table 1, USEPA estimates that 7 entities will apply to USEPA's manifest printing registry during the first two years covered by this ICR.<sup>4</sup> In addition, USEPA used its best judgement to estimate tht the Agency will receive three new applications in the third year covered by this ICR. Thus, USEPA estimates that, on average, 3 registrant organizations will be subject to the requirements in 40 CFR 262.21 over the 3-year period covered by this ICR.

Table 1 Estimated Number of Registrant Organizations Subject to 40 CFR 262.2 EPA Manifest Printing Registry				
	Year 1	Year 2	Year 3	Average
Number of registry applicants	4	3	3	3

##### (4B.2) Waste Handlers

For purposes of estimating respondent burden, this ICR uses USEPA-OSW's 2005 RCRA Hazardous Waste Biennial Report (BR) data to determine the universe of SQGs, LQGs, and TSDFs. The respondent burden estimates detailed in the previous ICR were based on 2001 BR data. Although the respondent burden estimates were updated using 2005 BR data, certain assumptions used to determine the respondent burden estimates in the previous ICR were also used in this ICR. For instance, it remains appropriate to distinguish between LQGs that generate but do not manage hazardous waste onsite, versus LQGs that both generate *and* manage (i.e., treat, store, or dispose of) hazardous waste on site. USEPA has found differences between these two groups in their manifesting practices and number of outbound shipments.

Based on 2005 BR data, USEPA estimates that 14,591 LQGs in the US generate but do not manage hazardous waste (these sites are referred to simply as "LQGs" in this ICR.) In addition, 2005 BR data indicate that 1,169 sites in the US both generate and manage hazardous waste onsite and hence qualify as TSDFs.<sup>5</sup> (This ICR refers to these 1,169 sites as "TSDFs acting as generators.")

<sup>4</sup> Estimates of new registrants are estimates by Wanda Lebleu, the Office of Solid Waste's (OSW) primary contact for the OSW's paper manifest printing registry.

<sup>5</sup> To determine the number of LQGs and TSDFs shipping hazardous waste off site, USEPA used information from the Waste Generation and Management (GM) Form and the RCRA Subtitle C Site Identification (Site ID) Form of the 2005 BRS. USEPA then eliminated facilities operated by the Federal government (i.e., government-owned, government-operated facilities (GOGOs) and privately-owned, government-operated facilities (POGOs)).

EPA estimates that, of the 1,169 TSDFs acting as generators, approximately 25% are commercial TSDFs (292) and 75% are captive TSDFs (877).<sup>6</sup> USEPA defines a commercial TSDF as a facility whose waste management capacity is available to any generators or facilities for commercial hazardous waste management, or to a limited group of generators or facilities for commercial hazardous waste management. A captive TSDF is a facility that receives hazardous waste from on-site sources only, or from on-site sources and off-site sources that are part of its same company only. USEPA estimates there are significant differences between commercial and captive TSDFs regarding waste volumes managed and number of manifests completed, and thus, the Agency has chosen to examine their manifest preparation burdens separately in this ICR.

To determine the number of SQGs that ship hazardous waste off site each year, USEPA performed an in-depth analysis of data from the 2005 BR data and from other USEPA information collection instruments (e.g., 3010 Notification).<sup>7</sup> Based on that analysis, USEPA estimates that 174,867 SQGs ship hazardous waste off site each year and are subject to the manifest system.<sup>8</sup>

In addition, there are 351 hazardous waste transporter companies subject to the manifest system.<sup>9</sup> Finally, USEPA referred to 2001 BR data to estimate that, each year, 546 TSDFs receive hazardous waste from off site.<sup>10</sup> Table 2 summarizes the number of waste handlers subject to manifesting requirements each year.

Type of Waste Handler		Number of Waste Handlers
1	Generators	
	LQGs	14,591 <sup>a</sup>
	Commercial TSDFs	292 <sup>b</sup>
	Captive TSDFs	877 <sup>b</sup>
	SQGs	174,867 <sup>a</sup>
	<i>Subtotal</i>	190,628
2	Transporters	351
3	Designated TSDFs (“receiving facilities”)	546 <sup>b</sup>
<p>a Includes sites that generate hazardous waste but do not manage it onsite under a permit.  b Many TSDFs acting as generators may also qualify as designated TSDFs. Hence, the number of designated TSDFs and TSDFs acting as generators are not additive.</p>		

#### 4C. Number of Annual RCRA Manifests

##### (4C.1) Number of Manifests that Accompany Shipments Initiated by the Generator

This ICR addresses the RCRA manifesting requirements for three types of hazardous waste shipments estimated in Table 3:

<sup>6</sup> These percentages are based on an analysis of prior year data on TSDFs contained in USEPA’s Office of Solid Waste RCRA Hazardous Waste Biennial Report database.

<sup>7</sup> ICF Consulting Inc collected data used in this analysis from USEPA’s Office of Solid Waste RCRAInfo database during 07-14 Nov 2003 (<http://www.epa.gov/epaoswer/hazwaste/data/index.htm#rcra-info>).

<sup>8</sup> The estimate does not include facilities operated by the Federal government (i.e., GOGOs or POGOs).

<sup>9</sup> Based on data in USEPA-OSW’s “Economics Background Document” developed for the March 2004 Manifest Form Revisions Final Rule.

<sup>10</sup> The estimate does not include facilities operated by the Federal government (i.e., GOGOs or POGOs).

- Domestic shipments of hazardous waste (i.e. shipments originating and terminating within the US)
- Import shipments (i.e. shipments received from a foreign country and shipped within the US)
- Export shipments subject to 40 CFR 262 subpart E (i.e. exports from the US to non-designated members of the Organization for Economic Cooperation and Development (OECD), as identified at 40 CFR 262.58(a)(1)). [Note: this ICR does not include manifest burden for waste exports to designated OECD countries.]

Type of Generator	Number of Generators that Manifest	Average Annual Number of Manifests Completed per Generator*	Annual Number of Manifests Completed
LQGs	14,591	46	664,484
Commercial TSDFs	292	347	101,551
Captive TSDFs	877	36	31,251
SQGs**	143,391**	9	1,277,615
Total	159,152	16	2,074,900

\* These numbers are rounded.  
 \*\* Of the 174,867 SQGs shipping hazardous waste off site each year, USEPA estimates that 143,391 must prepare and transmit a manifest with their off-site shipments and the remaining 31,476 operate under a reclamation agreement (based on consultations with industry in Sept 2003). As provided under 40 CFR 262.20(e), these 31,476 SQGs need not undertake any manifesting activities for their hazardous waste shipments to the recycling facility.

Table 4 breaks down the annual number of manifests that accompany domestic shipments, import shipments, and export shipments to non-designated OECD countries. Based on USEPA consultations, as well as data compiled by USEPA's Office of Enforcement and Compliance Assurance (OECA), USEPA estimates that 2,034,641 manifests accompany domestic shipments of hazardous waste and 19,509 manifests accompany export shipments to non-designated OECD countries each year, including Mexico and Canada. In addition, USEPA has used its best judgment to estimate that 20,750 manifests are prepared each year by transporters for imported hazardous wastes at point-of-entry into the US and all are received by commercial TSDFs (i.e. "receiving facilities"), which represents 1% of total annual manifests.

Type of Generator	Total Number of Manifests Completed/Year			
	Domestic Shipments	Import Shipments	Export Shipments to Non-Designated OECD Countries <sup>a</sup>	All Shipments
LQGs	648,670	6,645	9,169	664,484
Commercial TSDFs	98,974	1,016	1,561	101,551
Captive TSDFs	30,353	313	585	31,251
SQGs	1,256,644	12,777	8,194	1,277,615
Total	2,034,641	20,750	19,509	2,074,900

a Includes Mexico and Canada.

(4C.2) Number of Manifests that Accompany Shipments Rejected by the Designated TSDF

EPA estimates that each manifest completed and sent off site by a generator (2,074,900) will be delivered to the designated TSDF, minus those manifests accompanying export shipments (19,509 manifests) or lost during transport (173 manifests), plus import manifests (20,750). Hence, USEPA estimates that 2,075,968 manifests will be delivered to the designated TSDF. USEPA estimates that 3% (69,200) will be rejected.

Table 5 presents the number of manifests accompanying shipments that are rejected or for which a container residue is identified by the TSDF. USEPA estimates that 50% of these problem shipments (34,600) involve partially rejected loads or container residues identified after the transporter has left the TSDF's premises. USEPA estimates that 99% of these shipments will be sent to the alternate TSDF and 1% will be sent back to the generator. A new manifest must be prepared to send these shipments to the alternate TSDF or generator. EPA estimates that the remaining 50% of these problem shipments (34,600) involve fully rejected loads or container residues identified while the transporter is still on the TSDFs' premises. USEPA estimates that 99% of these shipments will be sent to the alternate TSDF and 1% will be sent back to the generator. The original manifest may be used to send these shipments to the alternate TSDF or generator.

Table 5 Total Annual Number of Manifests that Accompany Rejected Loads and Container Residues <sup>a</sup>	
Type of Shipment	Estimated Annual Number of Manifests
New Manifests that Accompany Rejected Shipments or Container Residues	
Shipments sent back to generator (1%)	346
Shipments sent to alternate TSDF (99%)	34,254
<i>Subtotal</i>	34,600
Original Manifests that Accompany Rejected Shipments or Container Residues	
Shipments sent back to generator (1%)	346
Shipments sent to alternate TSDF (99%)	34,254
<i>Subtotal</i>	34,600
<b>Total</b>	<b>69,200</b>

a Table contains rounding error.

## 5. ELEMENTS OF INFORMATION COLLECTED

### 5A. Manifest Printer Registrant Requirements

#### (a) Applying to the Registry

40 CFR 262.21(a) provides that a person may not print the manifest for use or distribution unless his/her organization (e.g., company, State agency) has received approval from USEPA to do so under 40 CFR 262.21(c) and (e). In order to receive USEPA approval, a registrant must submit to USEPA an application that contains the information specified in 40 CFR 262.21(b). Upon USEPA approval of the application, the registrant must submit three fully assembled manifests and, if needed, continuation sheets that meet the specifications of 40 CFR 262.21(f) and a description of the form samples, as specified in 40 CFR 262.21(d). In reviewing these submittals, USEPA may request modification to them before approval.

In developing the registry process, USEPA performed thorough consultation with waste handlers, commercial printers, and States and concluded that it is imperative for USEPA to evaluate the printing capabilities and form samples of registrants. Although many commercial printers have developed an expertise in multi-forms printing (the final rule requires RCRA manifests to be printed on a six-copy form), USEPA expects that certain prospective registrants will not have such expertise. Printing the manifest requires some degree of sophistication and expertise in order to consistently satisfy the performance requirements at 40 CFR 262.21(f). For example, registrants must design their manifest so that handwritten and typed imprints are legible on all six copies, the manifest instructions do not bleed through the front of the copies, and the binding of copies is reasonably secure.

The USEPA has posted print guidance on its Manifest Registry Web site (<http://www.epa.gov/osw/hazard/transportation/manifest/registry/index.htm>) to assist organizations – including states, waste management companies, industrial facilities and printing companies – in applying to USEPA to print the manifest. The web site also provides a list of registered printers approved by USEPA to print the form. Although USEPA has posted print guidance on the web, significant discretion will be left to the registrant to determine the appropriate paper type, paper weight, ink color of the instructions, and binding methods that will satisfy the print specifications. Because of this, it is essential that the registry review samples of their forms to determine if they comply with the print specifications, e.g., to evaluate the samples to see if they comply with the performance requirements.

In addition, USEPA and the States are keenly interested in making sure that manifest tracking numbers pre-printed on forms are tightly controlled and remain unique. One of the highest priorities of the registry is ensuring that each manifest used or distributed to the public has a unique tracking number. Because USEPA will allow registrants to pre-print numbers onto their manifests without any ongoing Agency oversight, it is essential that the registry evaluate and approve the registrant's procedures and systems for controlling their tracking numbers, as described in their applications.

#### Data Items

- An application that contains the following information:
  - Name and mailing address of registrant.
  - Name, telephone number, and email address of contact person.
  - Brief description of registrant's government or business activity.
  - EPA ID number of the registrant, if applicable.
  - Description of the scope of the operations that the registrant plans to undertake in printing, distributing, and using its manifests, including:
    - A description of the printing operation. The description should include an explanation of whether the registrant intends to print its manifests in-house or through a separate printing company. If the registrant intends to use a separate printing company to print the manifest on its behalf, the application must identify this printing company and discuss how the registrant will oversee the company. If this includes the use of intermediaries, the role of each must be discussed. The application must provide the name and mailing address of each company. It also must provide the name and telephone number of the contact person at each company.
    - A description of how the registrant will ensure that its organization and unaffiliated companies, if any, comply with the requirements of 40 CFR 262.21. The application must discuss how the registrant will ensure that a unique manifest tracking number will be pre-printed on each manifest. The application must describe the internal control procedures to be followed by the registrant and unaffiliated companies to ensure that numbers are tightly controlled and remain unique. If computer systems or other infrastructure will be used to maintain, track, or assign numbers, these should be indicated. The application must indicate how the printer will pre-print a unique number on each form. The application must explain the quality procedures to be followed by each establishment and printing company to ensure that all required print specifications are consistently achieved and that printing violations are identified and corrected at the earliest practicable time.
    - An indication of whether the registrant intends to use the manifests for its own business operations or to distribute the manifests to a separate company or to the general public (e.g., for purchase).
  - A brief description of the qualifications of the company that will print the manifest. The registrant may use readily available information to do so (e.g., corporate brochures, product samples, customer references, documentation of ISO certification), so long as such information pertains to the establishments or company being proposed to print the manifest.

- Proposed unique three-letter manifest tracking number suffix. If the registrant is approved to print the manifest, the registrant must use this suffix to pre-print a unique manifest tracking number on each manifest.
- A signed certification by a duly authorized employee of the registrant that the organizations and companies in its application will comply with the procedures of its approved application and the requirements of 40 CFR 262.21 and that it will notify USEPA of any duplicated manifest tracking numbers on manifests that have been used or distributed to other parties as soon as this becomes known.
- Three fully assembled manifests and, if needed, continuation sheets that meet all of the specifications in 40 CFR 262.21(f). The form samples must be printed by the company that will print the manifest as identified in the application approved under 40 CFR 262.21(c). The registrant need not submit samples of the continuation sheet if the continuation sheet will be printed using the same paper type, paper weight, ink color of the instructions, and binding method as the manifest.
- A description of the manifest samples as follows:
  - Paper type (i.e., manufacturer and grade of the manifest paper).
  - Paper weight of each copy.
  - Ink color of the manifest's instructions. If screening of the ink was used, the registrant must indicate the extent of the screening.
  - Method of binding the copies.

#### Respondent Activities

- Prepare and submit initial application.
- Submit revised initial application to USEPA, if requested.
- Submit three fully assembled manifests and, if needed, continuation sheets and a description of the form samples.
- Submit revised form samples based on USEPA comment on the initial samples, if requested.

#### (b) Updating General Information in the Approved Application

40 CFR 262.21(h)(1) provides that, if an approved registrant would like to update any of the information provided in its application (e.g., to update a company phone number or name of contact person), the registrant must revise the application and submit it to USEPA, along with an indication or explanation of the update, as soon as practicable after the change occurs. USEPA will review and either approve or deny the revision. If the revision is denied, the registrant must respond to the Agency's concerns.

#### Data Item

- Revised application, along with an indication or explanation of the update.

#### Respondent Activities

- Revise and submit the application to USEPA, along with an indication or explanation of the update.
- Respond to the Agency's concerns, if applicable.

#### (c) Requesting Approval for a New Tracking Number Suffix

40 CFR 262.21(h)(2) provides that, if an approved registrant would like a new tracking number suffix, the registrant must submit a proposed suffix to USEPA, along with the reason for requesting it.

#### Data Item

- Proposed tracking number suffix, along with the reason for requesting it.

#### Respondent Activity

- Submit a proposed tracking number suffix, along with the reason for requesting it.

#### (d) Requesting Approval for Changes to Printing Specifications or Use of a New Printer

40 CFR 262.21(h)(3) provides that, if a registrant would like to change the paper type, paper weight, ink color of the manifest instructions, or binding method of its manifest or continuation sheet subsequent to approval under 40 CFR 262.21(e), then the registrant must submit three samples of the revised form for USEPA review and approval. If the approved registrant would like to use a new printer, the registrant must submit three manifest samples printed by the new printer, along with a brief description of the printer's qualifications to print the manifest. In reviewing these submittals, USEPA may request modification to them before approval.

#### Data Items

- Three samples of the manifest form and/or continuation sheet.
- A brief description of the qualifications of the new printer, if applicable.

#### Respondent Activity

- Submit three samples of the manifest form and/or continuation sheet and, if applicable, a brief description of the qualifications of the new printer.
- Submit revised manifest form and/or continuation sheet samples to USEPA, if requested.

#### (e) Typesetting the Manifest Form Subsequent to its Approval

40 CFR 262.21(i) provides that, if subsequent to its approval under 40 CFR 262.21(e), a registrant typesets its manifest or continuation sheet instead of using the electronic file of the forms provided by USEPA, it must submit three samples of the manifest or continuation sheet to the registry for approval. The registrant cannot use or distribute its typeset forms until USEPA approves them.

#### Data Items

- Three samples of the manifest or continuation sheet.

#### Respondent Activity

- Submit three samples of the manifest or continuation sheet to the registry for approval.

#### (f) Requesting an Exemption

40 CFR 262.21(j) provides that USEPA may exempt a registrant from the requirement to submit form samples under 40 CFR 262.21(d) or 262.21(h)(3) if the Agency is persuaded that a separate review of the registrant's forms would serve little purpose in informing an approval decision (e.g., a registrant certifies that it will print the manifest using the same paper type, paper weight, ink color of the instructions, and binding method of the form samples approved for some other registrant). A registrant may request an exemption from USEPA by indicating why an exemption is warranted.

#### Data Item

- Documentation indicating why an exemption is warranted.

#### Respondent Activity

- Submit documentation to USEPA indicating why an exemption is warranted.

#### (g) Notifying USEPA of a Printing Specification Violation

40 CFR 262.21(k) requires an approved registrant to notify USEPA by phone or email as soon as it becomes aware that it has used or distributed manifests that contain duplicated manifest tracking numbers.

#### Data Item

- Notification of duplicated manifest tracking numbers.

#### Respondent Activity

- Notify USEPA of duplicated manifest tracking numbers.
- (h) Revising the Approved Manifest if Requested by USEPA

40 CFR 262.21(l) provides that, if, subsequent to approval of a registrant under 40 CFR 262.21(e), USEPA becomes aware that the registrant's approved form does not satisfactorily meet the print specifications in 40 CFR 262.21(f), USEPA will contact the registrant and require modifications to the form.

Data Item

- Revised manifest form samples.

Respondent Activity

- Submit revised manifest form samples to USEPA, if requested.

(i) Responding to Suspension and Revocation Procedures

40 CFR 262.21(m) provides that USEPA may suspend and, if necessary, revoke printing privileges if it finds that the registrant: (i) has deviated from its application approved under 40 CFR 262.21(c) in printing the form; (ii) has knowingly used or distributed forms that deviate from its approved form samples in regard to paper weight, paper type, ink color of the instructions, or binding method; or (iii) exhibits a continuing pattern of behavior in using or distributing manifests that contain duplicate manifest tracking numbers. USEPA will send a warning letter to the registrant that specifies the date by which it must come into compliance with the requirements. If the registrant does not come in compliance by the specified date, USEPA will send a second letter notifying the registrant that USEPA has suspended or revoked its printing privileges. An approved registrant must provide information on its printing activities to USEPA if requested.

Data Item

- Information requested by USEPA.

Respondent Activity

- Submit information if requested by USEPA.

## 5B. Generator Requirements

The 1976 RCRA statute, as well as regulations promulgated by USEPA, established the following requirements for hazardous waste generators, and related waste handlers:

- Large Quantity Generators (LQGs): RCRA, as amended, requires USEPA to establish the "use of a manifest system and any other reasonable means necessary to assure that all such hazardous waste...arrives at" the designated facility (Section 3002(5)). On May 19, 1980, USEPA promulgated regulations calling for the use of manifests by generators of greater than 1,000 kilograms/month of hazardous waste, thereby establishing the manifest system.
- Small Quantity Generators (SQGs: generators of between 100 and 1,000 kilograms/month): The Hazardous and Solid Waste Amendments of 1984 (HSWA) directed USEPA to promulgate standards for the generation, treatment, and disposal of hazardous waste produced by SQGs. In compliance with HSWA, USEPA promulgated regulations on March 24, 1986, that require SQGs to comply with the manifest requirements of 40 CFR 262 subpart B. A SQG can be exempt from the requirements listed in this section when its waste is reclaimed under a contractual agreement and certain other conditions are met. However, the SQG must maintain records of the agreement for at least three years after termination or expiration of the agreement, as required by 40 CFR 262.20(e)(2).
- Hazardous Waste Exporters: On August 8, 1986, USEPA promulgated regulations relating to the export of hazardous waste out of the US to supplement the 1980 regulations. 40 CFR 262 subpart E sets forth special manifesting requirements that primary exporters must meet in exporting their waste.

(a) Manifest Completion

40 CFR 262.20 requires generators transporting, or offering for transportation, hazardous waste for off-site treatment, storage, or disposal to prepare a manifest (EPA Form 8700-22) and, if necessary, continuation sheets (EPA Form 8700-22A). Generators must prepare these forms in accordance with 40 CFR 262.20, 262.23, 262.54, and 262.60, as appropriate, as well as the instructions in the appendix to 40 CFR 262.

#### Data Items

- The generator's USEPA ID or State ID number.
- The total number of pages used to complete the manifest.
- The emergency response phone number.
- The manifest tracking number.
  - The generator's name and mailing address.
  - The generator's phone number.
- The generator's site address (if different than mailing address).
  - The name and USEPA ID number for transporters.
  - The designated facility's name and site address.
- The designated facility's phone number.
  - The USEPA ID number of the designated facility.
- The USDOT description of the waste.
  - The container description (number and type).
  - The total quantity of each waste described.
  - The unit of measure.
- The waste codes representing the waste.
  - Special handling instructions and additional information.
  - The generator's/offeror's certification.<sup>11</sup>
- For primary exporters only: The primary exporter must prepare the manifest in accordance with 40 CFR 262.20 and 262.23, except as provided under 40 CFR 262.54(a) through (d):
  - In lieu of the site name, site address and USEPA ID number of the designated permitted facility, enter the name and site address of the consignee.
  - In lieu of the name, site address, and USEPA ID number of a permitted alternate facility, enter the name and site address of any alternate consignee.
  - In the International Shipments Block, check the export box and enter the point of exit (city and State) from the US.
- For primary importers only: The primary importer must prepare the manifest in accordance with 40 CFR 262.20 & 262.23, except as provided in 40 CFR 262.60(b) and (d):
  - In place of the generator's name, address, and USEPA ID number, use the name and address of the foreign generator and the importer's name, address, and USEPA ID number.
  - In place of the generator's signature on the certification statement, the US importer or his agent must sign and date the certification and obtain the signature of the initial transporter.
  - In the International Shipment Block, check the import box and enter the point of entry (city and State) into the US.

#### Respondent Activities

- Complete the manifest for domestic, export, and import shipments.
- Complete continuation sheet, if required.

#### (b) Compliance with State Program Requirements

Under 40 CFR 262.21(g)(2), generators must determine whether the consignment State regulates any additional wastes (beyond those regulated Federally) as hazardous wastes under its State hazardous waste program.

<sup>11</sup> The generator's/offeror's certification in Item 15 of the manifest form references the waste minimization certification codified at 40 CFR 262.27.

Generators must also determine whether the consignment State or generator State requires the generator to submit any copies of the manifest to these States.

#### Data Item

- Information provided by the State on its manifest program.

#### Respondent Activities

- Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable.

#### (c) Manifest Transmittal and Recordkeeping

Generators must transmit and keep records of the manifest in accordance with 40 CFR 262.23, 262.40, 262.44, 262.54 and 262.60, as appropriate.

#### Data Items

- A generator must sign and give copies of the manifest to the transporter along with the hazardous waste in accordance with 40 CFR 262.23(a) & (b), and retain copies of the manifest in accordance with 40 CFR 262.23(a) & 262.40(a).
- For shipments of hazardous waste within the US solely by water (bulk shipments only), the generator, as required by 40 CFR 262.23(c), must send three copies of the manifest to the owner/operator of the designated facility or the last water transporter to handle the waste in the US if exported by water.
- For rail shipments of hazardous waste within the US which originate at the site of generation, the generator, as required under 40 CFR 262.23(d), must send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the US if exported by rail.
- Exports: Acknowledgment of Consent: For exports, the primary exporter must provide the transporter with a USEPA Acknowledgment of Consent, and an additional copy of the manifest or shipping papers for delivery to the US Customs official at the point the hazardous waste exits the US, as required by 40 CFR 262.54(h) and (i).
- Reclamation Agreements: In the event an SQG's waste is reclaimed under a contractual agreement pursuant to 40 CFR 262.20(e)(1), the SQG must retain the reclamation agreement for at least three years from the date of termination or expiration of the agreement, as required by 40 CFR 262.20(e)(2).

#### Respondent Activities

- Sign the manifest certification and obtain the signature of the initial transporter and date of acceptance on the manifest in accordance with 40 CFR 262.23(a).
- Keep a copy of the manifest and give the remaining copies to the initial transporter, in accordance with 40 CFR 262.23(a) & (b).
- Keep a copy of the manifest returned from the designated facility for at least three years from the date the waste was accepted by the initial waste transporter, in accordance with 40 CFR 262.40(a) or 262.44(a).
- For shipments solely by water, send three copies of the manifest, dated and signed in accordance with 40 CFR 262.23(a), to the designated facility or the last water transporter to handle the waste in the US, as required by 40 CFR 262.23(c). [Note: Copies of the manifest are not required for each transporter.]
- For shipments by rail originating at the site of generation, send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the US, as required by 40 CFR 262.23(d).
- Exports: Acknowledgment of Consent: Primary exporters must provide the transporter with an USEPA Acknowledgment of Consent and an additional copy of the manifest or shipping papers for delivery to the

US Customs official at the point the hazardous waste exits the US, as required by 40 CFR 262.54(h) and (i).

- Reclamation Agreements: An SQG operating under a tolling agreement must retain a copy of each reclamation agreement, if applicable, for at least three years after the termination or expiration of the agreement, as required by 40 CFR 262.20(e)(2).

(d) Undeliverable Shipments

Generators must provide instructions to the transporter on how to deal with shipments that cannot be delivered to the designated or the alternate TSDF. For shipments that a transporter is unable to deliver to the designated facility or the alternate facility, generators must designate another facility or instruct the transporter to return the waste, as required by 40 CFR 262.20(d) and 262.54(g)(3).

Data Item

- Instructions to the transporter on how to deal with shipments that cannot be delivered to the designated or the alternate TSDF.

Respondent Activity

- For shipments that a transporter is unable to deliver to the designated facility or the alternate facility, designate another facility or instruct the transporter to return the waste.

Rejected Waste and Container Residues

USEPA has promulgated regulations at 40 CFR 262.34(j) to improve the tracking of rejected waste and container residues. USEPA has also expanded the definition of "*designated facility*" to include generators that receive rejected loads or container residues from the TSDF designated on their manifest to receive the waste. It is important to clarify the procedures that generators will need to follow for receiving and managing rejected load or container residue shipments sent back by the designated TSDF. These regulations will improve hazardous waste tracking, while placing minimal paperwork burden on generators (i.e. generators need only sign the form accompanying the problem shipment delivered to them).

Under 40 CFR 262.34(j), a generator who sends a shipment of hazardous waste to a designated facility with the understanding that the designated facility can accept and manage the waste and later receives that shipment back as a rejected load or residue in accordance with the manifest discrepancy provisions of 40 CFR 264.72 or 265.72 may accumulate the returned waste on-site, as specified. Upon receipt of the returned shipment, the generator must sign the manifest that accompanies the rejected load or residue.

Data Item

- Complete a manifest.

Respondent Activities

- Sign Item 18c of the manifest, if the transporter returned the shipment using the original manifest.
- Sign Item 20 of the manifest, if the transporter returned the shipment using a new manifest.

(f) Exception Reports: Completion, Submission, and Recordkeeping

(f1) Large Quantity Generators

USEPA's May 19, 1988 RCRA manifest regulations included requirements for generators to prepare, submit, and keep records of exception reports (40 CFR 262.42). In the event an LQG does not receive a copy of the signed manifest from the designated facility owner/operator within 35 days of the date the waste was accepted by the initial transporter, the LQG must contact the transporter and/or the owner/operator of the designated facility to determine the status of the hazardous waste. The LQG must submit an exception report to USEPA if he/she has not received a copy of the signed manifest from the designated facility owner/operator within 45 days of the date

the waste was accepted by the initial transporter and must retain a copy of the exception report for at least three years from the due date of the report, in accordance with 40 CFR 262.42(a) and 262.40(b).

#### Data Item

- An exception report containing the following data:
  - A legible copy of the manifest for which the generator does not have confirmation of delivery, as required by 40 CFR 262.42(a)(2)(i).
  - A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts, as required by 40 CFR 262.42(a)(2)(ii).

#### Respondent Activities

- Prepare and submit a signed cover letter to USEPA explaining the generator's efforts to locate the hazardous waste and the results of those efforts, along with a legible copy of the manifest, in accordance with 40 CFR 262.42(a)(2)(i) and (ii).
- Keep a copy of each exception report, as required by 40 CFR 262.40(b).

#### (f2) *Small Quantity Generators*

EPA's March 24, 1986 final regulations mandated use of the manifest system by SQGs, but exempted them from the exception report requirements applicable to LQGs. On June 6, 1986, the Environmental Defense Fund (EDF) sued in the US Court of Appeals for the reinstatement of the exception report requirement. Under the terms of the settlement agreement negotiated with EDF, the Agency agreed to propose a modified exception report requirement for SQGs and to take comment on other options for accomplishing the exception reporting purpose.

On September 23, 1987, USEPA promulgated regulations calling for exception reporting by SQGs. These regulations are similar to the existing requirements for LQGs, except that the SQG is not required to contact the transporter or facility owner/operator to determine the waste's disposition, the length of time before an exception report is required is 60 days, and the generator need only note on the manifest that he has not received confirmation of delivery (§262.42).

In the event an SQG does not receive a copy of the signed manifest from the owner/operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter, he/she must submit to the USEPA Regional Administrator a legible copy of the manifest with some indication that he has not received confirmation of delivery, in accordance with 40 CFR 262.42(b).

#### Data Item

- A legible copy of the manifest with some indication that the SQG has not received confirmation of delivery.

#### Respondent Activity

- Submit a legible copy of the manifest with some indication that the waste has not been delivered.

### 5C. **Transporter Requirements**

#### (a) **Manifest Completion, Transmittal, and Recordkeeping**

A critical part of the manifest system is the use of multiple copies of the manifest to track the shipment of hazardous waste as it moves from the generator to the designated TSDF by way of the transporter. Regulations found in 40 CFR 263 subpart B require transporters to ensure that the manifest accompanies the hazardous waste during transportation, to deliver the hazardous waste and the manifest as indicated on the manifest, and to keep records of the manifests.

Under 40 CFR 263.20 & 263.22, a SQG's waste, transported following a reclamation agreement, can be exempt from the manifest requirements of the section. However, the transporter is required to record waste generator data information on a log or shipping paper and retain a copy of these records, as required by 40 CFR 263.20(h).

40 CFR 263.20, 263.21 & 263.22 detail the completion, transmittal, and recordkeeping requirements of manifests or shipping papers for hazardous waste transporters, including those exporting hazardous waste outside the US. In accordance with these requirements, transporters must complete specified parts of the manifest (or shipping paper, as provided in 40 CFR 263.20(e)(2)), retain a copy of the manifest (or shipping paper), transmit copies to specified parties, and ensure that the original manifest or shipping papers accompany the waste to its destination.

*(a1) Hazardous Waste Transporters (except as exempted by 40 CFR 263.20(e) and (f))*

Except for certain water and rail transporters exempted under 40 CFR 263.20(e)&(f), transporters transporting hazardous waste outside the US (40 CFR 263.20(g)) and transporters transporting hazardous waste pursuant to a reclamation agreement (40 CFR 263.20(h)) & 263.20(b), (c),(d) require transporters to sign and date the manifest acknowledging acceptance of the waste from the generator before transporting the hazardous waste. Before leaving the property, the transporter must return or transmit a signed copy of the manifest to the generator. In addition, the transporter must ensure that a copy of the manifest or other shipping paper accompanies the shipment and is readily available and recognizable.

A transporter who delivers a hazardous waste to another transporter or to the designated facility must obtain the date of delivery and the signature of the transporter or designated facility; retain a copy in accordance with 40 CFR 263.22; and give the remaining copies of the manifest to the accepting transporter or designated facility, as required at 40 CFR 263.20(d).

Data Item

- Complete a manifest and/or shipping paper.

Respondent Activities

- Sign and date the manifest, as required by 40 CFR 263.20(b).
- Return a signed copy of the manifest to the generator, as required under 40 CFR 263.20(b).
- Ensure that the manifest (or other shipping paper) accompanies the waste to its destination, as required by 40 CFR 263.20(c).
- In delivering the hazardous waste and manifest to another transporter or to the designated facility, perform the following activities, as required by 40 CFR 263.20(d):
  - Obtain the date of delivery and signature of that transporter or the owner/operator of the facility or alternate facility designated on the manifest, pursuant to 40 CFR 263.20(d)(1).
  - Retain a copy of the manifest pursuant to 40 CFR 263.22(a).
  - Give remaining copies of the manifest to the accepting transporter or facility, in accordance with 40 CFR 263.20(d)(3).

*(a2) Water (Bulk Shipment) Transporters Regulated under 40 CFR 263.20(e)*

Water (bulk shipment) transporters who are regulated under 40 CFR 263.20(e) must sign and date the manifest upon receipt of the hazardous waste; must ensure that a shipping paper containing the generator, waste, and facility information, and a USEPA Acknowledgment of Consent for exports, accompany the waste during transportation; must obtain the signature of the facility owner/operator on the manifest or shipping paper; and must retain a copy of the manifest or shipping paper for three years.

#### Data Items

- Copies of the manifest.
- Copies of the shipping paper containing all the information on the manifest except the USEPA ID numbers, the generator certification, and required signatures, as required under 40 CFR 263.20(e).
- A USEPA Acknowledgment of Consent (for exporters only), as required by 40 CFR 263.20(e)(2).

#### Respondent Activities

- Obtain the date of delivery and signature of the initial water transporter on the manifest, in accordance with 40 CFR 263.20(e)(4).
- Forward the manifest to the designated facility, in accordance with 40 CFR 263.20(e)(4).
- Bulk water transporters identified under 40 CFR 263.20(e) must perform the following activities:
  - Ensure that the shipping paper (and Acknowledgment of Consent, for exports) accompanies the waste to its destination, as required by 40 CFR 263.20(e)(2).
  - If the delivering (water) transporter, obtain the date of delivery and signature of the owner/operator of the designated facility on either the manifest or shipping paper, as required by 40 CFR 263.20(e)(3).
  - If the initial water transporter, sign and date the manifest and return it to the delivering transporter so that the manifest can be forwarded to the designated facility owner/operator, as required by 40 CFR 263.20(e)(4).
  - Retain a copy of the manifest or shipping paper, as required by 40 CFR 263.22(b).

#### *(a3) Rail Transporters Regulated under 40 CFR 263.20(f)*

Under 40 CFR 263.20(f)(1), initial rail transporters must sign and date the manifest acknowledging acceptance of the hazardous waste; return or transmit a signed copy of the manifest to the non-rail transporter; and forward at least three copies of the manifest to the next non-rail transporter, the designated facility, if the shipment is delivered to that facility by rail, or the last rail transporter designated to handle the waste in the US; and retain a copy of the manifest and rail shipping paper in accordance with 40 CFR 263.22.

Rail transporters must ensure that a shipping paper containing all the information required on the manifest (excluding the USEPA ID numbers, generator certification, and signatures) and, for exports, a USEPA Acknowledgment of Consent accompanies the hazardous waste at all times, as required by 40 CFR 263.20(f)(2). When delivering hazardous waste to the designated facility, a rail transporter must obtain the date of delivery and signature of the owner or operator of the designated facility on the manifest, or a signature on the shipping paper (if the manifest has not been received by the facility) and retain a copy of the manifest or signed shipping paper, as required under 40 CFR 263.20(f)(3). When delivering hazardous waste to a non-rail transporter, a rail transporter must obtain the date of delivery and the signature of the next non-rail transporter on the manifest and retain a copy of the manifest, as required under 40 CFR 263.20(f)(4). Before accepting hazardous waste from a rail transporter, a non-rail transporter must sign and date the manifest and provide a copy to the rail transporter, as required by 40 CFR 263.20(f)(5).

#### Data Items

- Complete a manifest.
- A shipping paper containing all the information on the manifest, except the USEPA ID numbers, the generator certification, and required signatures.
- A USEPA Acknowledgment of Consent (for exports only).

#### Respondent Activities

- When accepting waste from a non-rail transporter, sign and date the manifest, as required by 40 CFR 263.20(f)(1)(i) and return or transmit a signed copy of the manifest to the non-rail transporter, as required by 40 CFR 263.20(f)(1)(ii).
- Forward at least three copies of the manifest to either the next non-rail transporter, the designated facility, or the last rail transporter designated to handle the waste in the US, as required by 40 CFR 263.20(f)(1)(iii).

- Ensure a shipping paper containing all the information required on the manifest excluding the USEPA ID number, generator certification, and signatures (and for exports an Acknowledgment of Consent) accompanies the waste, as required under 40 CFR 263.20(f)(2).
- When delivering hazardous waste to the designated facility or to the next non-rail transporter, obtain the signature and date of delivery of the facility or non-rail transporter on the manifest, as required under 40 CFR 263.20(f)(3)(i) or (f)(4)(i).
- Retain a copy of the manifest and/or rail shipping paper, as required under 40 CFR 263.20(f)(1)(iv), 263.20(f)(3)(ii), 263.20(f)(4)(ii) and 263.22, as applicable.
- Before accepting hazardous waste from a rail transporter, sign and date the manifest and provide a copy to the rail transporter, as required under 40 CFR 263.20(f)(5).

*(a4) Transporters Who Import or Export Hazardous Wastes (40 CFR 263.20(g) & (i))*

Under 40 CFR 263.20(g), transporters who either transport hazardous waste into (import) or out of (export) the US, must sign and date the manifest to indicate the date that the shipment arrived (import) or left (export) the US, respectively; retain one copy in accordance with 40 CFR 263.22; for exports return a signed copy to the generator and provide a copy of the exported waste manifest to a US Customs official at the point of departure from the US. In addition for exports, the transporter also must ensure that a copy of the USEPA Acknowledgment of Consent accompanies the waste, as required by 40 CFR 263.20(a).

Data Items

- Complete a manifest or shipping paper.
- EPA Acknowledgment of Consent.

Respondent Activities

- For imports and exports, sign and date the manifest in the International Shipments block to indicate the date that the shipment entered or left the US, respectively, as required by 40 CFR 263.20(g)(1).
- For imports and exports, retain a copy of the manifest, as required by 40 CFR 263.20(g)(2).
- For exports, return a signed copy of the manifest to the generator, as required by 40 CFR 263.20(g)(3).
- For exports, give a copy of the manifest to a US Customs official at the point of departure from the US, as required by 40 CFR 263.20(g)(4).
- For exports, ensure that copies of the manifest and USEPA Acknowledgment of Consent accompanies the waste, as required by 40 CFR 263.20(a).

*(a5) Transporters Who Transport Hazardous Waste Pursuant to a Reclamation Agreement (263.20(h))*

40 CFR 263.20(h) provides that transporters can be exempt from the requirements of 40 CFR 263.20 & 263.22 when transporting a SQG's waste pursuant to a reclamation agreement in accordance with 40 CFR 262.20(e). These transporters are required to record data items on a log or shipping papers, carry the record to the reclamation facility, and retain these records, as required by 40 CFR 263.20(h).

Data Items

- The name, address, and USEPA ID number of the hazardous waste generator.
- The quantity of waste accepted.
- All USDOT-required shipping information.
- The date the waste is accepted.

Respondent Activities

- Record the waste information on a log or shipping paper, as required by 40 CFR 263.20(h)(2).
- Carry the record when transporting waste to the reclamation facility, as required by 40 CFR 263.20(h)(3).
- Retain the records for at least three years after termination or expiration of the agreement, as required by 40 CFR 263.20(h)(4).

(b) Undeliverable Shipments

Under 40 CFR 263.21(a), the transporter must deliver the entire quantity of hazardous waste which he has accepted from a generator or a transporter to the designated facility listed on the manifest; the alternate designated facility, the next designated transporter; or the place outside the US designated by the transporter. 40 CFR 263.21(b)(1) requires that, if the hazardous waste cannot be delivered in accordance with 40 CFR 263.21(a) because of an emergency condition other than rejection of the waste by the designated facility, then the transporter must contact the generator for further directions and must revise the manifest according to the generator's instructions.

Data Items

- A manifest that has been revised according to the generator's instructions.

Respondent Activities

- Contact the generator for further directions and revise the manifest according to the generator's instructions.

(c) Rejected Waste and Container Residues

USEPA has promulgated regulations at 40 CFR 263.21 to improve the tracking of rejected waste and container residues. These regulations further clarify procedures that transporters will need to follow when dealing with rejected waste or container residue shipments sent back to the original generator or to an alternate TSDF. Under 40 CFR 263.21(b)(2), if a hazardous waste is rejected or a container residue is identified by the designated facility listed on the manifest while the transporter is on the facility's premises, then the transporter must comply with the appropriate procedures:

- Partial load rejections: The transporter must obtain the facility's signature and date, the manifest tracking number of the new form, and a description/indication of the rejected waste in the discrepancy block on the original manifest. The transporter must retain this copy of the manifest in accordance with 40 CFR 263.22 and give the remaining copies to the designated facility. If the transporter is forwarding the shipment to the alternate facility or returning it to the generator, the transporter must obtain the new manifest for the shipment.
- Full load rejections or container residues: The transporter must obtain the original manifest that includes the facility's signature and date, name and address of the alternate facility or generator, and a description of the rejected load or container residue in the discrepancy block as appropriate. The transporter must retain this copy of the manifest in accordance with 40 CFR 263.22 and give a copy to the facility. If the original manifest is not used, then the transporter must obtain a new manifest for the shipment.

Data Item

- Complete a manifest.

Respondent Activities

- For partially rejected loads made while the transporter is on site, obtain the amended manifest from the facility, keep a copy, and, if receiving the rejected waste, obtain the new manifest.
- For fully rejected loads made or container residues identified while the transporter is on site, obtain the original manifest, as amended, from the facility.

(d) Notification of Discharge of Hazardous Waste

The 49 CFR 263 subpart C regulations reference USDOT notification requirements for hazardous waste transporters responding to a discharge of hazardous waste and establish requirements for water (bulk shipment) transporters who discharge hazardous waste, similar to notification requirements for oil and hazardous substances releases.

In the event of a discharge of hazardous waste during transportation, 40 CFR 263.30(a) requires the transporter to take appropriate immediate action to protect human health and the environment, for example, notifying local authorities. 40 CFR 263.30(c) requires an air, rail, highway, or water transporter who has

discharged hazardous waste to give notice, if required by 49 CFR 171.15, to NRC and to report in writing to USDOT as required by 49 CFR 171.16. 40 CFR 263.30(d) requires a water (bulk shipment) transporter who has discharged hazardous waste to give the same notice as required by 33 CFR 153.203 for oil and hazardous substances, if not already required under 33 CFR 153.203. Water (bulk shipment) transporters, as soon as they have knowledge of any discharge of hazardous waste, must immediately notify NRC, US Coast Guard, as required by 33 CFR 153.203. If the direct reporting to the NRC is not practicable, reports may be made to the US Coast Guard or USEPA predesignated OSC for the geographic area where the discharge occurs. If it is not possible to notify the NRC or the predesignated OSC immediately, reports may be made immediately to the nearest US Coast Guard unit, provided the transporter notifies the NRC as soon as possible.

#### Data Item

- Notification of a discharge of hazardous waste

#### Respondent Activities

- In the event of a discharge of hazardous waste during transportation, the transporter must take appropriate action to protect human health and the environment, including notification of the discharge to local authorities, as required by 40 CFR 263.30(a).
- Water (bulk shipment) transporters must immediately notify NRC of the discharge or, if it is not practicable to notify the NRC, a predesignated OSC can be notified. If the OSC is notified, the transporter must notify the NRC of the discharge as soon as possible, as required by 40 CFR 263.30(d) and 33 CFR 153.203.

[Note: This ICR does not include hour and cost burden estimates for activities associated with the 49 CFR 171 notification requirements referenced in 40 CFR 263 since Part 263 does not add any notification requirements to those already in 49 CFR 171.]

### **5D. Designated Treatment, Storage, and Disposal Facility Requirements**

#### (a) Manifest Completion, Transmittal, and Recordkeeping

40 CFR 264.71(a),(b) and 40 CFR 265.71(a),(b) set forth completion, transmittal, and recordkeeping requirements for TSDFs that receive hazardous waste accompanied by a manifest or shipping paper. 40 CFR 264.71(a),(b) and 40 CFR 265.71(a),(b) provide that, if a facility receives hazardous waste accompanied by a manifest (or shipping paper, for certain rail or water shipments), the TSDF or his/her agent must sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received; note any significant discrepancies in the manifest on each copy; immediately return to the transporter a signed copy; within 30 days of delivery send a copy of the manifest to the generator; and retain a copy for at least three years from the date of delivery.

#### Data Items

- Copies of the manifest or shipping paper.

#### Respondent Activities

- Complete, transmit, and retain copies of the manifest, as required by 40 CFR 264.71(a),(b) or 40 CFR 265.71(a),(b) and the manifest instructions:
  - Enter the name of the person accepting the waste and sign and date each copy of the manifest (or shipping paper, if applicable).
  - Complete the management method codes.
  - Note any discrepancies (as defined in 40 CFR 264.72(a)) on each copy of the manifest (or shipping paper, if applicable).
  - Immediately give the transporter at least one copy of the manifest (or shipping paper).
  - Within 30 days of delivery, send a copy of the manifest (or shipping paper) to the generator.
  - Imported wastes: Within 30 days of delivery, the receiving TSDF must mail a final signed copy of the imported waste manifest to EPA's International Compliance Assurance Division.

- Retain a copy of the manifest (or shipping paper) for at least three years from the date of delivery. [Note: Although the noting of manifest or shipping paper discrepancies is mentioned above, it is burdened in the subsection entitled “Discrepancy Reports.”]

(b) Compliance with State Program Requirements

Under 40 CFR 264.71(e) and 40 CFR 265.71(e), TSDFs must determine whether the consignment State for a shipment regulates any additional hazardous wastes (beyond those regulated Federally). TSDFs must also determine whether the consignment State or generator State requires the facility to submit any copies of the manifest to these States.

Data Item

- Information provided by the State on its manifest program.

Respondent Activities

- Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable.

(c) Discrepancy Reports

The 40 CFR 264 & 265 subpart E regulations also require TSDFs to note and potentially report discrepancies (40 CFR 264.71& 264.72; 265.71 & 265.72), and make records and reports available to USEPA (40 CFR 264.74 & 264.77; 265.74 & 265.77). 40 CFR 264.72 and 265.72 provide that, upon discovering a significant discrepancy, TSDFs must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the owner/operator must immediately submit to USEPA a copy of the manifest or shipping paper in question, as well as a letter describing the discrepancy and attempts to reconcile it.

Data Items

- A copy of the manifest or shipping paper in question.
- A letter describing the manifest discrepancy and the facility’s efforts to reconcile it.

Respondent Activities

- Attempt to reconcile any discrepancies, as required by 40 CFR 264.72(c) or 265.72(c).
- Prepare and submit a letter to USEPA describing the discrepancy and attempts to reconcile it, along with a copy of the manifest or shipping paper at issue, as required by 40 CFR 264.72(c) or 265.72(c).

(d) Rejected Waste and Container Residues

40 CFR 264.72 and 40 CFR 265.72 provide that the TSDF must forward rejected waste or container residues to an alternate facility that can accept the waste. If the TSDF is unable to locate an alternate facility to take the waste, then the TSDF may return the shipment to the original generator. 40 CFR 264.72(d) through (g) and 40 CFR 265.72(d) through (g) describe manifest procedures for TSDFs that originate a rejected waste or container residue.

*(d1) Rejection of Waste after the Transporter Leaves the Facility*

For full or partial load rejections and residues that are to be sent off site to an alternate facility or back to the generator after the transporter has left the facility, the facility is required to prepare a new manifest, as required by 40 CFR 264.72(d), (e)(1)-(6), or (f)(1)-(6) or 40 CFR 265.72(d), (e)(1)-(6), or (f)(1)-(6).

In addition, if a facility rejects a waste or identifies a container residue that exceeds the quantity limits for “empty” containers set forth in 40 CFR 261.7(b) after it has signed, dated, and returned a copy of the manifest to the transporter, the facility must comply with 40 CFR 264.72(g) or 265.72(g). The facility must amend its copy of the manifest to indicate the rejected wastes or residues in the discrepancy space of the amended manifest. The facility must also copy the manifest tracking number from Item 4 of the new manifest to the Discrepancy space of the amended manifest, and must re-sign and date the manifest to certify to the information as amended. The

facility must retain the amended manifest for at least three years from the date of amendment, and must within 30 days, send a copy of the amended manifest to the delivering transporter and to the generator.

#### Data Items

- Instructions provided by the generator.
  - Copy of the original manifest and/or shipping paper.
  - Copy of a new manifest and/or shipping paper.

#### Respondent Activities

- Contact the generator to obtain the generator's instructions for forwarding the waste to another facility that can manage the waste, as required by 40 CFR 264.72(d) or 265.72(d).
- Prepare a new manifest for rejected loads or container residues sent to the alternate designated facility or back to the generator:
  - Write the facility's USEPA ID, name, and address in the appropriate blocks of the new manifest (i.e. Items 1 and 5), as required by 40 CFR 264.72(e)(1) or (f)(1) or 265.72(e)(1) or (f)(1).
  - Write the name of the alternate designated facility/initial generator and the facility's/generator's USEPA ID number in the designated facility block (Item 8) of the new manifest, as required by 40 CFR 264.72(e)(2) or (f)(2) or 265.72(e)(2) or (f)(2).
  - Copy the manifest tracking number found in Item 4 of the old manifest to the Special Handling and Additional Information Block of the new manifest, and indicate that the shipment is a residue or rejected waste from the previous shipment, as required by 40 CFR 264.72(e)(3) or (f)(3) or 265.72(e)(3) or (f)(3).
  - Copy the manifest tracking number found in Item 4 of the new manifest to the manifest reference number line in the Discrepancy Block of the old manifest (Item 18a), as required by 40 CFR 264.72(e)(4) or (f)(4) or 265.72(e)(4) or (f)(4).
  - Write the USDOT description for the rejected load or the residue in the Item 9 (USDOT Description) of the new manifest and write the container types, quantity, and volume(s) of waste, as required by 40 CFR 264.72(e)(5) or (f)(5) or 265.72(e)(5) or (f)(5).
  - Sign the Generator's/Offeror's Certification to certify, as the offeror of the shipment, that the waste has been properly packaged, marked and labeled and is in proper condition, as required by 40 CFR 264.72(e)(6) or (f)(6) or 265.72(e)(6) or (f)(6).
- Amend the facility's copy of the manifest to indicate the rejected wastes or residues in the discrepancy space of the amended manifest, as required by 40 CFR 264.72(g) or 265.72(g).
- Copy the manifest tracking number from Item 4 of the new manifest to the Discrepancy space of the amended manifest, as required by 40 CFR 264.72(g) or 265.72(g).
- Re-sign and date the manifest, as required by 40 CFR 264.72(g) or 265.72(g).
- Retain the amended manifest for at least three years from the date of the amendment, as required by 40 CFR 264.72(g) or 265.72(g).
- Within 30 days, send a copy of the amended manifest to the delivering transporter and to the generator, as required by 40 CFR 264.72(g) or 265.72(g).

#### *(d2) Rejection of Waste while the Transporter Remains Present at the Facility*

For container residues and full load rejections that are made while the transporter remains present at the facility, the facility may forward the shipment to the alternate facility or return the shipment to the generator using the original manifest, as specified in 40 CFR 264.72(e)(7) or (f)(7) or 40 CFR 265.72(e)(7) or (f)(7).

#### Data Item

- Copy of the original manifest and/or shipping paper.

#### Respondent Activities

- Contact the generator to obtain the generator's instructions for forwarding the waste to another facility that can manage the waste, as required by 40 CFR 264.72(d) or 265.72(d).

- Complete Item 18a and 18b of the original manifest, as applicable, by supplying the information on the next destination facility or the generator in the Alternate Facility space.
- Retain a copy of the manifest.
- Give the remaining copies back to the transporter.

(e) Unmanifested Waste Report: Completion and Submission

Pursuant to 40 CFR 264.76 and 265.76, if the TSDF accepts a hazardous waste for treatment, storage, or disposal from any off-site source without an accompanying manifest or a shipping paper as described in 40 CFR 263.20(e) (2), and the waste is not excluded from the manifest requirement, the facility owner/operator must prepare and submit a letter to USEPA.

Data Items

- The USEPA ID number, name, and address of facility.
- The date the facility received the waste.
- The USEPA ID number, name, and address of generator and transporter, if available.
- A description and quantity of each unmanifested hazardous waste the facility received.
- The method of treatment, storage, or disposal for each hazardous waste.
- The certification signed by the owner/operator of the facility or his authorized representative.
- A brief explanation of why the waste was unmanifested, if known.

Respondent Activities:

- Prepare and submit to USEPA a letter of the unmanifested waste within 15 days after receiving the waste.

## **6. AGENCY ACTIVITIES, COLLECTION METHODOLOGY & INFORMATION MANAGEMENT**

The following subsections discuss how USEPA will collect the information, what activities USEPA will perform once the information has been received, and how USEPA will manage the information it collects under the manifest system. The subsections also include a discussion of how the information collection requirements will affect small entities.

### **6A. Agency Activities**

The Agency activities associated with the manifest requirements include the review of exception reports, discrepancy reports, and unmanifested waste reports. The Agency reviews these reports to identify potentially non-compliant or otherwise unresolved activities that warrant Agency attention. For example, upon receipt of an exception report, the Agency may conduct a follow-up investigation to assist the generator in locating the shipment. The Agency keeps these reports on file. In addition, USEPA requires manifest form printers to register with USEPA, as provided under 40 CFR 262.21. The Agency will need to review, process, and keep records of the data submitted. Note that, as provided under the regulations, manifests, shipping papers, contractual agreements, and reclamation agreements are not formally submitted to USEPA, but must be kept on file at the generator's, transporter's or TSDF's location and made available to USEPA upon request. Accordingly, this analysis does not include Agency activities associated with review of these documents.

### **6B. Collection Methodology & Management**

Under the registry, USEPA will collect registrants' initial applications under 40 CFR 262.21(b) through the regular mail, although some registrants may voluntarily choose to send them by certified mail. USEPA will examine each application to ensure that the registrant takes appropriate steps to control its tracking numbers and print a quality manifest. USEPA will then request form samples from the registrant through the mail. USEPA will evaluate each registrant's form samples to ensure they satisfy the print specifications at 40 CFR 262.21(f). USEPA will then keep the forms on file for future reference. USEPA will post the name, manifest tracking

number suffix, and contact information of each approved registrant on its web site, so that the general public is aware of who the approved registrants are, what suffixes have been approved, and how to contact registrants for forms.

USEPA collects reports submitted by waste handlers under the manifest system (e.g., exception reports and discrepancy reports) through the regular mail, although some waste handlers may voluntarily choose to send them by certified mail. USEPA reviews the reports to understand the situation at issue and take follow up action as needed. USEPA keeps the files on record for future reference.

### **6C. Small Entity Flexibility**

The current regulations require both large and small quantity generators of hazardous waste to use the manifest to track shipments of hazardous waste. However, the Agency has found that most small businesses do not generate hazardous waste either at all or in large enough quantities to make them subject to regulation and, therefore, are not affected by the manifest requirements. Generators of less than 100 kg/month (conditionally exempt small quantity generators) are exempted from manifest requirements. Also, USEPA has exempted from the manifest requirements universal wastes (i.e., batteries, mercury thermostats, lamps, and pesticides, as specified), spent lead-acid batteries going for recycling, and used oil being recycled or burned for energy recovery.

(1) **Contractual Reclamation Agreements**

A small quantity generator (SQG) is exempt from the manifest requirements when his hazardous waste is reclaimed under a contractual agreement, and he complies with limited requirements, including recordkeeping of the contractual agreement, as required by 40 CFR 262.20(e)(2).

(2) **Exception Reports**

The exception report requirements, under 40 CFR 262.42, for SQGs are less stringent than those for large quantity generators (LQGs). A SQG is only required to submit to USEPA a legible copy of the manifest with some indication he/she has not received confirmation of delivery and has 60 days to fulfill this requirement. LQGs, on the other hand, are required to contact the transporter or facility owner/operator if he/she has not received a copy of the manifest within 35 days. In addition, if 45 days have passed and the LQG still has not received a signed copy of the manifest, he/she must submit a copy of the manifest as well as a cover letter explaining the generator's efforts to locate the hazardous waste. Hence, the exception report requirements for SQGs are not as burdensome.

### **6D. Collection Schedule**

(1) **Registry Document Collection: Registrant Organizations**

Before printing the manifest for use or distribution, registrants must submit an initial application, three fully assembled manifests, and a description of the form samples to USEPA. USEPA will either approve the registrant to print the forms, or request modification to the application and/or samples before approval. In addition, registrants that would like to use a new tracking number suffix, change the printing specifications of their manifest, use a new printer, or typeset their manifest subsequent to USEPA approval to print the manifest must submit additional documentation (e.g., proposed suffix, manifest samples, brief description of the new printer's qualifications to print the manifest), as specified.

Before an approved registrant can change its form in regard to paper type, paper weight, ink color of the instructions, or binding method, or before using a new printer, it must seek USEPA approval by submitting new form samples and, if applicable, a description of the new printer. Note, however, that a registrant may request an exemption from the requirement to submit form samples if the Agency is persuaded that a separate review of the registrant's forms would serve little purpose in informing an approval decision. Any approved registrant wanting to update any information provided in its application must revise the application and submit it to USEPA, along with an indication or explanation of the update, as soon as practicable after the change occurs.

Finally, an approved registrant must notify USEPA by phone or email as soon as it becomes aware that it has duplicated manifest tracking numbers on forms that have been used or distributed. The registrant must also provide information on its printing activities, if requested by USEPA.

- (2) **Manifest and Other Document Collection: Generators, Transporters, and TSDFs**  
Since copies of manifests, shipping papers, contractual agreements, and reclamation agreements are kept at the generator's, transporter's or TSDF's location and not normally submitted to USEPA, discussion of a collection schedule is not applicable.
- (3) **Exception Reports Collection: Generators**  
LQGs must submit exception reports to USEPA within 45 days of the date the waste was accepted by the initial transporter, if he or she has not received a copy of the manifest signed by the TSDF. SQGs must submit an abbreviated version of an exception report to USEPA within 60 days.
- (4) **Manifests Returned to Generators: Designated TSDFs**  
Designated TSDFs must return a signed and dated copy of the manifest to the generator within 30 days after delivery of the waste.
- (5) **Discrepancy and Unmanifested Waste Report Collection: Designated TSDFs**  
Designated TSDFs must submit discrepancy reports and unmanifested waste reports to USEPA within 15 days of delivery of the waste to the TSDF.

**7. ESTIMATE OF BURDEN HOURS & COST**

The attached spreadsheet Exhibits 1 to 19 present USEPA's estimates of burden hours and associated costs for all the information collection requirements covered in this ICR. The burden estimates for each activity presented in spreadsheet Exhibits 1 through 18 include the burden hours (total and by labor type) per respondent, as well as the overall burden hours for all respondents. Associated annual costs for all paperwork burden activities covered in this ICR include annual labor, capital, and operation and maintenance (O&M) costs. According to the 1995 Paperwork Reduction Act, "burden" is defined as follows:

*"The term 'burden' means time, effort, or financial resources expended by persons to generate, maintain, or provide information to or for a Federal agency, including the resources expended for: (a) reviewing instructions; (b) acquiring, installing, and utilizing technology and systems (c) adjusting the existing ways to comply with any previously applicable instructions and requirements; (d) searching data sources; (e) completing and reviewing the collection of information; and (f) transmitting or otherwise disclosing the information." (PRA Section 3502(2)).*

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.

**7A. Labor Wage Rates**

(7A.1) Respondent Labor:

Table 6 estimates an average hourly respondent labor cost (overhead and fringe benefits loaded wage rates:

Table 6				
Labor Category	Labor Category	Labor Category	Labor Category	Labor Category
Legal	Lawyers	\$54.65	1,4845	\$81.13
	SOC 11-0000			

Managerial	Management Occupations	\$44.20	1.4845	\$65.61
Technical	Industrial Engineering Technicians	\$24.48	1.4845	\$36.34
Clerical	SOC 43-9061 Office Clerks, General	\$12.12	1.4845	\$17.99
<p>* Data Source: US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 National Occupational Employment and Wage Estimates (averages across all NAICS codes): <a href="http://www.bls.gov/oes/current/oes_nat.htm">http://www.bls.gov/oes/current/oes_nat.htm</a></p> <p>** Loaded wage rates estimated by multiplying the unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., Federal government civilian wage full fringe benefit cost factor of 36.45%, plus 12% overhead cost factors) from Figure C1 of the 29 May 2003 OMB Circular A-76: Performance of Commercial Activities: <a href="http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html">http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html</a></p>				

(7A.2) Agency Labor:

Table 7 estimates the Agency hour and cost burden associated with the new information collection requirements covered in this ICR in Exhibit 19. Based on the *General Schedule (GS) Salary Table 2004*, USEPA estimates the following average hourly labor costs (overhead and fringe benefit loaded wage rates):

Labor Category	BLS Standard Occupational Category (SOC) code	May 2006 Unloaded Wage Rate (\$/hour)*	Fringe/Overhead Multiplier	May 2006 Loaded Wage Rate
Legal	SOC 23-1011 Lawyers	\$37.49	1.4845	\$55.65
Managerial	SOC 11-0000 Management Occupations	\$35.19	1.4845	\$52.24
Technical	Environmental Science & Protection	\$21.06	1.4845	\$31.26
Clerical	SOC 43-9061 Office Clerks, General	\$13.43	1.4845	\$19.94
<p>· US Bureau of Labor Statistics (BLS) Occupational Employment Statistics (OES) for May 2006 National Industry-Specific Occupational Employment &amp; Wage Estimates for NAICS 999200 State Government: <a href="http://www.bls.gov/oes/current/naics4_999200.htm">http://www.bls.gov/oes/current/naics4_999200.htm</a></p> <p>** Loaded wage rates estimated by multiplying the unloaded wage rates by 1.4845, which represents addition of two cost factors (i.e., Federal government civilian wage full fringe benefit cost factor of 36.45%, plus 12% overhead cost factors) from Figure C1 of the 29 May 2003 OMB Circular A-76: Performance of Commercial Activities: <a href="http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html">http://www.whitehouse.gov/omb/circulars/a076/a76_incl_tech_correction.html</a></p>				

**7B. Respondent Capital Costs**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. For this ICR, USEPA estimates that respondents will incur capital costs associated with the purchase of banker boxes for manifest storage, estimated by the following steps:

- Annual manifest copies for file storage: Under the manifest system, generators, transporters, and designated TSDFs must keep copies of manifests and other manifest-related documents for a period of three years (the RCRA manifest is printed as a six-copy form). In addition, as of 2001, 34 state governments collect at least one completed manifest copy representing 76% of annual manifests, and some states collect two copies, both initial and final (source: USEPA-OSW “Economics Background Document” for the final rule). Thus, at any given time during the effective period of this ICR, the

hazardous waste industry and state governments are keeping about four copies of three years' worth of RCRA manifests:

$[(2,074,900 \text{ manifests/year}) \times (3 \text{ years retention}) \times (4 \text{ copies/manifest})] = 24,898,802 \text{ copies/year}$

- Number of banker boxes needed: USEPA estimates that a 15 inch long storage banker box holds 2,700 pages and costs \$6.00 each.<sup>12</sup> Thus, for storing copies of RCRA manifests, waste handlers would need to purchase the following number of banker boxes each year:  
 $[(24,898,802 \text{ manifest copies/year}) / (2,700 \text{ copies/banker box})] = 9,222 \text{ banker boxes/year}$   
 $[(9,222 \text{ banker boxes/year}) \times (\$6.00/\text{banker box})] = \$55,332/\text{year}$
- Warehouse needed: USEPA estimates that the 9,222 banker boxes will be stored in a warehouse, and the warehouse lease space per box is 7.5 square feet.<sup>13</sup> The square foot lease cost for storage box warehousing is \$5.68.
- Annual leasing Cost of warehouse:  $[(9,222 \text{ banker boxes/year}) \times (\$5.68 \text{ leasing cost/sq.ft.}) \times 7.5 \text{ sq.ft. lease space/ box}] = \$392,857/\text{year}^{14}$
- Annualized cost of storage boxes and warehousing =  $\$55,332/\text{year} + \$392,857/\text{year} = \$448,189/\text{year}$

## 7C. Respondent O&M Costs

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as "the recurring dollar amount of costs associated with O&M or purchasing services." For this ICR, O&M costs include:

- Mailing costs: USEPA estimates that respondents will incur a cost of \$0.42 to mail an one-ounce package (\$0.041 for postage and \$0.01 for standard-size envelope). USEPA also estimates that respondents will incur a cost of \$4.18 for mailing a larger package (i.e., a five-ounce package) by certified mail (\$1.48 for postage, \$2.65 for the certified-mail fee, and \$0.05 for a manila envelope).
- Photocopying costs: USEPA estimates that respondents will incur a cost of \$0.10 for each photocopy they make.
- Long distance telephone call costs: USEPA estimates that respondents will incur a cost of \$2.00 for each long distance telephone call they make.
- Printing cost for sample manifests: USEPA estimates that respondents will incur a cost of \$500 for each set of manifest form samples. These respondents are expected to contract with a printing company. Hence, the fee of \$500 is considered a lump-sum cost.

These O&M costs are shown in Exhibits 1 through 19 for all applicable respondent activities.

## 7D. Itemized Estimates of Burden Hours and Costs

Based on the labor wage rates and capital and O&M cost assumptions presented above, the attached spreadsheet Exhibits 1 to 18 present USEPA's estimates of respondents' burden hour and costs associated with all the requirements covered in this ICR. Exhibit 19 presents USEPA's estimate of Agency burden.

(a) Registrant Organization Requirements

(a1) *Reading the Regulations*

Exhibit 1 presents the total annual hour and cost burden to registrant organizations in reading the manifest regulations at 40 CFR 262.21. USEPA expects that on average, 14 registrant organizations will read 40 CFR 262.21 regulations each year.

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<sup>12</sup> Banker storage box cost based on price for (180 paper sheets per inch) x (15 inched deep box) advertised price from <http://www.specialmoving.com/Boxes.html>

<sup>13</sup> Lease space per square foot is base on Source: (1.5ft box width x 2ft depth)+(1.5ftx3ft frontage walkspace)

<sup>14</sup> Square foot per year lease cost for storage box warehousing of \$5.68 from May 2007 US average from: <http://www.bizlex.com/story.php?id=443>

*(a2) Applying to the Registry*

USEPA estimates that each year, 3 entities will register with USEPA to print their own forms. As shown in Exhibit 1, USEPA estimates that all 3 entities registering with USEPA will submit an application, three fully assembled manifests, and a description of the manifest form samples, as required by 40 CFR 262.21(b) and (d). USEPA further estimates that, each year, all registrants (i.e., three registrants) will need to prepare and submit a revised application under 40 CFR 262.21(c). USEPA expects that 67% of the registrants (i.e., 2 registrants) will need to submit revised manifest form samples under 40 CFR 262.21(e).

*(a3) Updating General Information in the Approved Application*

USEPA estimates that, each year, one registrant organization will revise and submit its application to USEPA, along with an indication or explanation of the update, under 40 CFR 262.21(h)(1). USEPA further estimates that no registrant organization will need to respond to USEPA's concerns regarding its revised application during the 3-year period covered by this ICR. USEPA will provide print guidance to each prospective registrant on the USEPA website to assist them in designing an approvable form, minimizing the likelihood that they will be asked to resubmit samples to the registry.

*(a4) Requesting Approval for a New Tracking Number Suffix*

EPA estimates that no approved registrant organization will request a new tracking number suffix during the 3-year period covered by this ICR. Because each manifest tracking number consists of the three-letter suffix and nine digits, each registrant will be able to generate more than 999 million forms using its original suffix. USEPA does not expect a registrant to request a new suffix for many years.

*(a5) Requesting Approval for Changes to Printing Specifications or Use of a New Printer*

USEPA estimates that no registrant organization will request approval for changes to its form or for the use of a new printer during the 3-year period covered by this ICR, assuming that each registrant will be forward looking when originally applying to the registry. Applicants will determine the appropriate paper type, paper weight, and other form aspects, so that they will not need to seek changes to their forms subsequent to their approval under 40 CFR 262.21(e).

*(a6) Typesetting the Manifest Form Subsequent to its Approval*

USEPA estimates that no registrant organization will typeset its manifest form, instead of using the electronic file of the forms provided by USEPA, during the 3-year period covered by this ICR. Upon approval of a registrant's application under 40 CFR 262.21(c), USEPA will provide it with an electronic file of the manifest, continuation sheet, and instructions and ask it to use these files to develop the forms. In its consultations, USEPA found that printers intend to share these files among their printing establishments so that none will need to typeset the form. Typesetting the form would be unappealing to registrants because of the level of effort required in comparison with using the electronic files.

*(a7) Requesting an Exemption*

USEPA estimates that, each year, one registrant organization will submit a request for an exemption under 40 CFR 262.21(j). As mentioned, USEPA expects each registrant to be forward looking when originally registering under 40 CFR 262.21(b) through (e), and carefully select the appropriate paper type, paper weight, and other aspects of the form. Therefore, few, if any, are expected to request changes to the approved form subsequent to approval.

*(a8) Notifying USEPA of a Printing Specification Violation*

EPA estimates that no registrant organization will notify USEPA that it has duplicated tracking numbers on forms used or distributed to other parties. Registrants must print their forms according to their approved applications, which will lay out procedures for tightly controlling their tracking numbers and ensuring that each manifest has a

unique number. Because of these assurances, USEPA expects that no registrant will duplicate its numbers and notify USEPA.

*(a9) Revising the Approved Manifest if Requested by USEPA*

USEPA estimates that no registrant organization will need to submit revised manifest form samples, per USEPA's request, during the 3-year period covered by this ICR. USEPA will carefully review each registrant's forms under 40 CFR 262.21(e) to determine if they satisfy the requirements of 40 CFR 262.21(f). USEPA does not expect to identify problems in forms that have been approved.

*(a10) Responding to Suspension and Revocation Procedures*

USEPA does not expect to conduct suspension or revocation procedures during the 3-year period covered by this ICR. The registration process under 40 CFR 262.21(b) through (e) will ensure that each approved registrant is capable of tightly controlling its tracking numbers and printing forms consistent with the approved samples and the print specifications. Therefore, USEPA anticipates it will rarely invoke its suspension and revocation procedures.

*(b) Generator Requirements*

*(b1) Reading the Regulations*

Exhibit 2 presents the total annual hour and cost burden to hazardous waste generators in reading the manifest regulations at 40 CFR 262. In total, USEPA expects that 131,803 generators will read the 40 CFR 262 regulations each year.

*(b2) Manifest Completion*

Exhibits 3 and 4 present the total annual hour and cost burden for generators to complete their manifests. Note that the exhibits reflect the fact that destination sites (referred to as designated TSDFs) often provide assistance to their generator customers in preparing manifests for shipments to their facility. For purposes of analysis, this ICR assumes that a percentage of LQGs and SQGs rely on the designated TSDFs' assistance in manifest preparation, while the remaining LQGs and SQGs, as well as all TSDFs acting as generators, prepare their manifests themselves, as follows:

- **Completing the Manifest Without the Assistance of Designated TSDF:** Based on consultations with hazardous waste generators and the States, USEPA estimates that about 58% of LQG manifests and 20% of SQG manifests accompanying hazardous waste shipments are prepared without the assistance of the designated TSDF. This is reflected in Exhibit 3. In addition, USEPA estimates that about 5% of manifests include continuation sheets.
- **Completing the Manifest With the Assistance of Designated TSDF:** As discussed, USEPA recognizes that many LQGs and SQGs rely on the assistance of the designated TSDF to complete the manifest form. Because the designated TSDF normally fills out most of the manifest form for the generator, the collaborative effort significantly reduces the burden on generators. Based on its consultations, USEPA estimates that about 42% of manifests from LQGs and 80% of manifests from SQGs are jointly completed with the designated TSDF. This is reflected in Exhibit 4. [Note: Refer to Exhibit 14 for the hour and cost burden for designated TSDFs to assist LQGs and SQGs in completing their manifests.]

*(b3) Compliance with State Program Requirements*

40 CFR 262.21(g)(2) provides that generators must determine whether they are required to comply with requirements specific to State hazardous waste manifest programs. As shown in Exhibit 5, USEPA assumes that each generator must contact, on average, three State manifest programs each year. Because these activities are already required under State hazardous waste programs, they are not burdened in this ICR.

*(b4) Manifest Transmittal and Recordkeeping*

As shown in Exhibit 6, USEPA estimates that LQGs, TSDFs acting as generators, and SQGs will send 3% of their manifests with water shipments and 6% with rail shipments. Generators must comply with the requirements of 40 CFR 262.23, 262.24, and 262.40 when transmitting and keeping records of the manifest, as appropriate. In addition, USEPA estimates that, each year, LQGs, TSDFs acting as generators, and SQGs will send 19,509 manifests with exports of hazardous waste and 20,750 manifests with imports of hazardous waste. Finally, USEPA estimates that approximately 31,476 SQGs ship their hazardous waste off site under a reclamation agreement, pursuant to 40 CFR 262.20. These SQGs are required to keep a copy of the contractual agreement under which their hazardous waste is shipped to the recycling facility.

*(b5) Undeliverable Shipments*

Based on consultations as shown in Exhibit 7, USEPA estimates that roughly 0.10% of shipments cannot be delivered to the designated TSDF each year. Generators must provide instructions to the transporter on how to deal with these shipments, as required by 40 CFR 262.20(d) and 262.54(g)(3).

*(b6) Rejected Waste and Container Residues*

As shown in Exhibit 8, USEPA estimates that, each year, a total of 586 shipments initiated by generators will be rejected by designated TSDFs and sent back to the generator (see Table 8). Upon receipt of the rejected shipments, generators must sign the manifest that accompanies the rejected load or residue.

*(b7) Exception Reports: Completion, Submission, and Recordkeeping*

EPA estimates that, on average, LQGs, TSDFs acting as generators, and SQGs will need to develop an exception report under 40 CFR 262.42 for approximately 0.5% of the manifests sent off site. This assumption is reflected in Exhibit 9.

*(c) Transporter Requirements*

*(c1) Reading the Regulations*

As shown in Exhibit 10, there are reportedly 351 hazardous waste transporter companies subject to the RCRA manifest system. USEPA expects that each company will read the manifest regulations once a year.

*(c2) Manifest Completion, Transmittal, and Recordkeeping*

Exhibit 11 examines the manifesting hour and cost burden for transporters transporting domestic and international shipments of hazardous waste. USEPA estimates that, of the manifests completed and transmitted each year for domestic and import shipments, approximately 91% will accompany highway shipments, 3% will accompany water shipments, and 6% will accompany rail shipments. USEPA further estimates that 20,750 manifest forms will accompany imports and 19,509 manifest forms will accompany exports to non-designated OECD countries. Finally, USEPA estimates that transporters transporting hazardous waste shipments under a reclamation agreement will need to comply with 40 CFR 263.20(h).

*(c3) Undeliverable Shipments*

In Exhibit 11 EPA estimates that each year transporters will be unable to deliver approximately 2,075 shipments of hazardous waste they have accepted from a generator or a transporter to the designated facility listed on the manifest, the alternate designated facility, the next designated transporter, or the place outside the US designated by the generator. These transporters will have to contact the generator for further directions and revise the manifest according to the generator's instructions, as required by 40 CFR 263.21.

*(d3) Rejected Waste and Container Residues*

Exhibit 11 also provides an estimate that each year 3,460 shipments are partially rejected while the transporter is still on the premises. The transporter must follow applicable procedures for obtaining the manifest from the facility and, if it accepts the forwarded shipment, it must obtain the new manifest. USEPA estimates that 34,600 shipments initiated by generators will be fully rejected by the designated TSDF while the transporter is on the facility's premises. For these shipments, the transporter must follow applicable procedures for obtaining the original manifest from the facility in order to forward the waste to the alternate facility or generator.

*(d4) Notification of Discharge of Hazardous Waste*

The *Statistical Abstract of the United States*, released in 2001 by the US Census Bureau indicates that there were 16,977 accidents involving transporters of hazardous substances in 1999. Of these, USEPA estimates that approximately 5% (849) involved hazardous waste transporters who had a discharge of hazardous waste. In Exhibit 12, USEPA used its best professional judgment to estimate that approximately 849 hazardous waste transporters will be required to notify local authorities of a hazardous waste discharge annually, as required under 40 CFR 263.30.

In addition, the NRC indicates that it received approximately 4,378 notifications of marine source incidents in 2001 for discharges of oil or hazardous substances. NRC estimates that about 66% of these incidents involved oil discharges (2,919) and that 33% involved hazardous substances discharges (1,459). Of the 1,459 discharges of hazardous substances, NRC estimates that 5% (73) involved a hazardous waste. As shown in Exhibit 12, USEPA expects that, on average, 73 water transporters transporting hazardous waste will notify NRC or USEPA under 33 CFR 153. The purpose of 33 CFR 153 is to prescribe regulations concerning notification to the US Coast Guard of the discharge of oil or hazardous substances as required by the Federal Water Pollution Control Act, as amended; the procedures for the removal of a discharge of oil; and the costs that may be imposed or reimbursed for the removal of a discharge of oil or hazardous substances.

*(d) Designated Treatment, Storage, and Disposal Facility Requirements*

*(d1) Reading the Regulations*

Based on USEPA's 2005 RCRA Hazardous Waste Biennial Report (BR) data, USEPA estimates that 546 TSDFs receive off-site shipments of hazardous waste each year. As shown in Exhibit 13, USEPA expects that each facility will read the manifest regulations once a year.

*(d2) Manifest Completion, Transmittal, and Recordkeeping*

Exhibit 14 presents USEPA's estimates that approximately 42% and 80% of manifests from LQGs and SQGs, respectively, are completed jointly with the designated TSDF. In addition, USEPA estimates that 5% of these manifests include continuation sheets.

Exhibit 15 presents the burden to designated TSDFs for receiving and completing manifests that are not rejected and that do not result in a container residue.

*(d3) Compliance with State Program Requirements*

40 CFR 264.71(e) and 265.71(e) provides that TSDFs must determine whether they are required to comply with requirements specific to State hazardous waste manifest programs. USEPA assumes that each TSDFs must contact, on average, three State manifest programs each year. Because these activities are already required under State hazardous waste programs, they are not burdened in this ICR. This is reflected in Exhibit 15.

*(d4) Discrepancy Reports*

As shown in Exhibit 15, USEPA estimates that approximately 25% of manifests accepted by the designated TSDF require reconciling discrepancies between the manifest data and the shipment (e.g. by phoning the generator). USEPA further estimates that about 0.4% of manifests accepted by the designated TSDF will require a discrepancy report under 40 CFR 264.72 or 265.72.

*(d5) Rejected Waste and Container Residues*

- Rejection of Waste after the Transporter Leaves the Facility: As shown in Exhibit 16, USEPA estimates that each year designated TSDFs will reject a shipment or identify a container residue after the transporter has left the TSDFs' premises for 34,600 hazardous waste shipments received.
- Rejection of Waste while the Transporter Remains Present at the Facility: As shown in Exhibit 16, USEPA estimates that each year designated TSDFs will fully reject or identify a container residue while the transporter is on the TSDFs' premises for 34,600 hazardous waste shipments received.
- Manifest Completion by the Alternate TSDF: Also shown in Exhibit 16, USEPA estimates that each year designated TSDFs will reject a total of 69,200 shipments and forward 68,507 shipments to an alternate TSDF (see Table 8).

*(d6) Unmanifested Waste Reports: Completion and Submission*

As shown in Exhibit 17, USEPA estimates that designated TSDFs will need to complete approximately 173 letters notifying the Agency of unmanifested waste shipments each year, as required under 40 CFR 264.76 or 265.76.

**7E. Bottom Line Burden Hours & Cost**

National aggregate respondent and Agency burden hour and associated costs are summarized below, as estimated in spreadsheet Exhibits 1 to 20 provided as an appendix to this document. Cumulative burden hours and costs are based on a 3-year time-span over which the ICR is effective, and over which USEPA averaged burden and cost estimates. Therefore, cumulative burden is equal to annual burden estimates multiplied by three.

Respondent Burden (Exhibits 1 to 18): 3.74 million hours at an average annual cost of \$109.9 million, including \$968,989 per year capital cost and \$2.10 million per year O&M cost. Cumulative burden to respondents over three years is 11.23 million hours at a cost of \$329.8 million.

Agency Burden (Exhibit 19): About 9,388 hours at an average annual cost of \$0.33 million. Cumulative burden to the Agency over three years is 28,164 hours at a cost of about \$1.0 million.

Total Burden (Respondents + Agency): 3.75 million hours at an average annual cost of \$110.3 million. Cumulative total burden over three years is 11.26 million hours at a cost of \$330.8 million.

**7F. Reasons for Change in Burden**

This current ICR (#801.16) renews and updates the previously approved ICR (#801.15). ICR #801.15 estimated a total annual respondent burden of 3,264,991 hours. ICR #801.16 estimates a total annual respondent burden of 3,743,122 hours, which is an increase of 478,131. The reason for the change in burden is primarily due to the increase in the SQG universe for this ICR renewal cycle. As mentioned previously, USPA used 2005 BR data to update its estimates of waste handlers (e.g., SQGs, LQGs, and TSDFs) subject to the Federal manifest requirements. The estimates of annual respondents given in the previous ICR were based on 2001 BR data. Although the LQG and TSDF estimates for this ICR renewal decreased, the SQG estimate increased from 113,132 previously to 174,867. The effect of this net increase of waste handlers subject to the manifest regulations is that the projected number of manifests completed annually increased by 18% from 1,762,276 previously to 2,074,900.

**7G. Burden Statement**

Table 8 summarizes the estimated average burden hours for reporting and recordkeeping per affected entities (i.e. registrants, generators, transporters, and TSDFs) under USEPA's final rule revising the RCRA hazardous waste manifest system.

Reporting burden: For generators includes time for reviewing and signing the manifest (i.e. for generators whose manifests are prepared by TSDFs). May also include time for preparing the entire manifest and submitting an exception report to USEPA. For transporters includes time to carry copies during shipment. For TSDFs includes time for reviewing the manifest at shipment delivery and transmitting a

copy to the generator. May also include time for preparing a generator’s manifest and submitting a discrepancy report to USEPA.

Recordkeeping burden: For generators includes time reading the regulations once per year and keeping copies of the initial manifest and final manifest received from the TSDF. For LQGs and TSDFs, it may also include time for keeping a copy of an exception report. For transporters and TSDFs, the recordkeeping burden includes time for reading the regulations once per year and keeping a copy of the manifest accompanying the shipment.

Respondent Type		Reporting Burden (Hours)	Recordkeeping Burden (Hours)	Total Burden (Hours)
1	Manifest printer registrants	1.72 - 2.42	1.25	2.97 - 3.67
2	Hazardous Waste Generators			
	Large Quantity Generators (LQGs)	0.04 - 1.84	1.45 - 1.55	1.49 - 3.39
	TSDFs acting as generators	0.54 - 1.87	1.45 - 1.55	1.99 - 3.42
	Small Quantity Generators (SQGs)	0.04 - 1.20	1.45	1.49 - 2.65
3	Transporters	0.17 - 2.80	1.42	1.59 - 4.22
4	Designated TSDFs	0.44 - 1.42	1.42 - 1.59	1.86 - 3.01

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, 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.

To comment 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 use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-RCRA-2007-1127, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the RCRA Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202)566-1744, and the telephone number for RCRA Docket is (202)566-0270.

Use [www.regulations.gov](http://www.regulations.gov) to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. Once in the system, select “search,” then key in the docket ID number identified in this document.

EXHIBIT 1  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR REGISTRANT ORGANIZATIONS \*

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Registrants	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Read the regulations</b>										
Read the regulations	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	3	4	\$176
<b>Applying to the Registry (262.21(b) and 262.21(d))</b>										
Prepare and submit initial application	0.00	0.25	1.00	0.10	1.35	\$54.54	\$4.18	3	5	\$196
Submit revised initial application to EPA, if requested	0.00	0.10	0.50	0.10	0.70	\$26.53	\$4.18	3	2	\$102
Submit three fully assembled manifests and, if needed, continuation sheets and a description of the form samples	0.00	0.10	0.17	0.10	0.37	\$14.54	\$504.18	3	1	\$1,729
Submit revised form samples based on EPA comment on the initial samples, if requested	0.00	0.10	0.17	0.10	0.37	\$14.54	\$504.18	2	1	\$1,210
<b>Updating General Information in the Approved Application (262.21(h)(1))</b>										
Revise and submit the application to EPA, along with an indication or explanation of the update	0.00	0.10	0.17	0.10	0.37	\$14.54	\$0.42	3	1	\$45
Respond to the Agency's concerns, if applicable	0.00	0.10	0.17	0.00	0.27	\$12.74	\$0.00	1	0	\$13
<b>Requesting Approval for a New Tracking Number Suffix (262.21(h)(2))</b>										
Submit a proposed tracking number suffix, along with the reason for requesting it	0.00	0.10	0.17	0.10	0.37	\$14.54	\$0.42	0	0	\$0
<b>Requesting Approval for Changes to Printing Specifications or Use of a New Printer (262.21(h)(3))</b>										
Submit three samples of the manifest form and/or continuation sheet and, if applicable, a brief description of the qualifications of the new printer	0.00	0.10	0.17	0.10	0.37	\$14.54	\$504.18	1	0	\$519
Submit revised manifest form and/or continuation sheet samples to EPA, if requested	0.00	0.10	0.17	0.10	0.37	\$14.54	\$504.18	1	0	\$519
<b>Typesetting the Manifest Form Subsequent to its Approval (262.21(i))</b>										
Submit three samples of the manifest or continuation sheet to the registry for approval	0.00	0.00	0.17	0.10	0.27	\$7.98	\$504.18	0	0	\$0
<b>Requesting an Exemption (262.21(j))</b>										
Submit documentation to EPA indicating why an exemption is warranted	0.00	0.10	0.17	0.10	0.37	\$14.54	\$0.42	2	1	\$35
<b>Notifying EPA of a Printing Specification Violation (262.21(k))</b>										
Notify EPA of duplicated manifest tracking numbers	0.00	0.00	0.25	0.00	0.25	\$9.09	\$2.00	1	0	\$15
<b>Revising the Approved Manifest if Requested by EPA (262.21(l))</b>										
Submit revised manifest form samples to EPA, if requested	0.00	0.10	0.17	0.10	0.37	\$14.54	\$504.18	0	0	\$0
<b>Responding to Suspension and Revocation Procedures (262.21(m))</b>										
Submit information if requested by EPA	0.00	0.25	0.50	0.00	0.75	\$34.57	\$0.42	0	0	\$0
<b>TOTAL</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>15</b>	<b>\$4,559</b>

\* Exhibit contains rounding error.

EXHIBIT 2  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
READING THE REGULATIONS

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Generators	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Read the regulations</b>										
LQGs	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	14,591	18,239	\$769,540
TSDFs	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	1,169	1,461	\$61,658
SQGs	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	174,867	218,584	\$9,222,501
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>0.25</b>	<b>1.00</b>	<b>0.00</b>	<b>1.25</b>	<b>\$52.74</b>	<b>\$0.00</b>	<b>190,628</b>	<b>238,284</b>	<b>\$10,053,699</b>

\* Exhibit contains rounding error.

EXHIBIT 3  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
COMPLETING THE MANIFEST (WITHOUT ASSISTANCE OF DESIGNATED TSDFs)

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion: LQGs (262.20)</b>										
Complete the manifest	0.00	0.00	0.40	0.10	0.50	\$16.34	\$0.00	385,401	192,701	\$6,297,452
Complete the continuation sheet	0.00	0.00	0.19	0.04	0.23	\$7.62	\$0.00	19,270	4,432	\$146,837
<b>Subtotal (for LQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>385,401</b>	<b>197,133</b>	<b>\$6,444,289</b>
<b>Manifest completion: TSDFs who are also generators (262.20)</b>										
<b>Commercial TSDFs</b>										
Complete the manifest	0.00	0.00	0.43	0.10	0.53	\$17.43	\$0.00	101,551	53,822	\$1,770,028
Complete the continuation sheet	0.00	0.00	0.18	0.04	0.22	\$7.26	\$0.00	5,078	1,117	\$36,866
<b>Captive TSDFs</b>										
Complete the manifest	0.00	0.00	0.43	0.10	0.53	\$17.43	\$0.00	31,251	16,563	\$544,699
Complete the continuation sheet	0.00	0.00	0.18	0.05	0.23	\$7.44	\$0.00	1,563	359	\$11,629
<b>Subtotal (for TSDFs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>132,801</b>	<b>71,861</b>	<b>\$2,363,222</b>
<b>Manifest completion: SQGs (262.20)</b>										
Complete the manifest	0.00	0.00	0.40	0.08	0.48	\$15.98	\$0.00	255,523	122,651	\$4,083,258
Complete the continuation sheet	0.00	0.00	0.18	0.03	0.21	\$7.08	\$0.00	12,776	2,683	\$90,454
<b>Subtotal (for SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>255,523</b>	<b>125,334</b>	<b>\$4,173,712</b>
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>773,725</b>	<b>394,328</b>	<b>\$12,981,223</b>

\* Exhibit contains rounding error.

EXHIBIT 4  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
COMPLETING THE MANIFEST (WITH ASSISTANCE OF DESIGNATED TSDFs)

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion: LQGs (262.20)</b>										
Complete the manifest	0.00	0.00	0.02	0.01	0.03	\$0.91	\$0.00	279,083	8,372	\$253,966
<b>Manifest completion: SQGs (262.20)</b>										
Complete the manifest	0.00	0.00	0.02	0.01	0.03	\$0.91	\$0.00	1,022,092	30,663	\$930,104
<b>TOTAL (LQGs and SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>	<b>0.01</b>	<b>0.03</b>	<b>\$0.91</b>	<b>\$0.00</b>	<b>1,301,175</b>	<b>39,035</b>	<b>\$1,184,070</b>

\* Exhibit contains rounding error.

EXHIBIT 5  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
COMPLIANCE WITH STATE PROGRAM REQUIREMENTS

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Phone Calls	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Compliance with State program requirements: LQGs (262.21(g))</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	43,774	0	\$0
<b>Compliance with State program requirements: TSDFs who are also generators (262.21(g))</b>										
<b>Commercial TSDFs</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	877	0	\$0
<b>Captive TSDFs</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	2,631	0	\$0
<b>Subtotal (for TSDFs)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>3,507</b>	<b>0</b>	<b>\$0</b>
<b>Compliance with State program requirements: SQGs (262.21(g))</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	430,174	0	\$0
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>477,455</b>	<b>0</b>	<b>\$0</b>

\* Exhibit contains rounding error.

EXHIBIT 6  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
TRANSMITTING THE MANIFEST

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest transmittal and recordkeeping: LQGs</b>										
<b>Manifest (262.23(a), 262.23(b), and 262.40(a))</b>										
Sign the manifest certification and obtain the signature of the initial transporter and date of acceptance on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	664,484	6,645	\$239,214
Keep a copy of the manifest and give the remaining copies to the initial transporter	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	664,484	66,448	\$1,196,071
Keep a copy of the manifest returned from the designated facility	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	664,484	66,448	\$1,196,071
For shipments solely by water, send three copies of the manifest, dated and signed, to the designated facility or the last water transporter to handle the waste in the U.S.	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	19,935	3,190	\$65,786
For shipments by rail originating at the site of generation, send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the U.S.	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	39,869	6,379	\$131,568
<b>Exports (262.54(h) and (i))</b>										
Provide the transporter with an EPA Acknowledgment of Consent and an additional copy of the manifest or shipping papers for delivery to the U.S. Customs official at the point the hazardous waste exits the U.S.	0.00	0.00	0.00	0.25	0.25	\$4.50	\$0.10	9,169	2,292	\$42,178
<b>Subtotal (for LQGs)</b>	0.00	0.00	varies	varies	varies	varies	varies	varies	151,402	\$2,870,888

EXHIBIT 6 (CONTINUED)  
 ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
 TRANSMITTING THE MANIFEST

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest transmittal and recordkeeping: Commercial TSDFs</b>										
<b>Manifest (262.23(a), 262.23(b), and 262.40(a))</b>										
Sign the manifest certification and obtain the signature of the initial transporter and date of acceptance on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	101,551	1,016	\$36,558
Keep a copy of the manifest and give the remaining copies to the initial transporter	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	101,551	10,155	\$182,791
Keep a copy of the manifest returned from the designated facility	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	101,551	10,155	\$182,791
For shipments solely by water, send three copies of the manifest, dated and signed, to the designated facility or the last water transporter to handle the waste in the U.S.(Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	3,047	488	\$10,055
For shipments by rail originating at the site of generation, send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the U.S. (Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	6,093	975	\$20,107
<b>Exports (262.54(h) and (i))</b>										
Provide the transporter with an EPA Acknowledgment of Consent and an additional copy of the manifest or shipping papers for delivery to the U.S. Customs official at the point the hazardous waste exits the U.S.	0.00	0.00	0.00	0.25	0.25	\$4.50	\$0.10	1,561	390	\$7,181
<b>Subtotal (for Commercial TSDFs)</b>	0.00	0.00	varies	varies	varies	varies	varies	varies	23,179	\$439,483

EXHIBIT 6 (CONTINUED)  
 ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
 TRANSMITTING THE MANIFEST

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest transmittal and recordkeeping: Captive TSDFs</b>										
<b>Manifest (262.23(a), 262.23(b), and 262.40(a))</b>										
Sign the manifest certification and obtain the signature of the initial transporter and date of acceptance on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	31,251	313	\$11,250
Keep a copy of the manifest and give the remaining copies to the initial transporter	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	31,251	3,125	\$56,251
Keep a copy of the manifest returned from the designated facility	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	31,251	3,125	\$56,251
For shipments solely by water, send three copies of the manifest, dated and signed, to the designated facility or the last water transporter to handle the waste in the U.S.(Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	938	150	\$3,095
For shipments by rail originating at the site of generation, send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the U.S. (Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	1,875	300	\$6,188
<b>Exports (262.54(h) and (i))</b>										
Provide the transporter with an EPA Acknowledgment of Consent and an additional copy of the manifest or shipping papers for delivery to the U.S. Customs official at the point the hazardous waste exits the U.S.	0.00	0.00	0.00	0.25	0.25	\$4.50	\$0.10	585	146	\$2,692
<b>Subtotal (for Captive TSDFs)</b>	0.00	0.00	varies	varies	varies	varies	varies	varies	7,159	\$135,727

EXHIBIT 6 (CONTINUED)  
 ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
 TRANSMITTING THE MANIFEST

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest transmittal and recordkeeping: SQGs</b>										
<b>Manifest (262.23(a), 262.23(b), and 262.40(a))</b>										
Sign the manifest certification and obtain the signature of the initial transporter and date of acceptance on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,277,615	12,776	\$459,941
Keep a copy of the manifest and give the remaining copies to the initial transporter	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	1,277,615	127,762	\$2,299,707
Keep a copy of the manifest returned from the designated facility	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	1,277,615	127,762	\$2,299,707
For shipments solely by water, send three copies of the manifest, dated and signed, to the designated facility or the last water transporter to handle the waste in the U.S.(Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	38,328	6,132	\$126,483
For shipments by rail originating at the site of generation, send at least three copies of the manifest to the next non-rail transporter, the designated facility, or the last rail transporter to handle the waste in the U.S. (Domestic and Exports)	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	76,657	12,265	\$252,968
<b>Exports (262.54(h) and (i))</b>										
Provide the transporter with an EPA Acknowledgment of Consent and an additional copy of the manifest or shipping papers for delivery to the U.S. Customs official at the point the hazardous waste exits the U.S.	0.00	0.00	0.00	0.25	0.25	\$4.50	\$0.10	8,194	2,049	\$37,692
<b>Reclamation agreements (262.20(e)(2))</b>										
Retain a copy of each reclamation agreement	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.00	31,476	3,148	\$56,657
<b>Subtotal (for SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>291,894</b>	<b>\$5,533,155</b>
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>473,634</b>	<b>\$8,979,253</b>

\* Exhibit contains rounding error.

EXHIBIT 7  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
UNDELIVERABLE SHIPMENTS

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Undeliverable shipments: LQGs (262.20(d) and 262.54(g)(3))</b>										
Designate another facility or instruct the transporter to return the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	664	53	\$1,932
<b>Undeliverable shipments: Commercial TSDFs (262.20(d) and 262.54(g)(3))</b>										
Designate another facility or instruct the transporter to return the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	102	8	\$297
<b>Undeliverable shipments: Captive TSDFs (262.20(d) and 262.54(g)(3))</b>										
Designate another facility or instruct the transporter to return the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	31	2	\$90
<b>Undeliverable shipments: SQGs (262.20(d) and 262.54(g)(3))</b>										
Designate another facility or instruct the transporter to return the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	1,278	102	\$3,719
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.08</b>	<b>0.00</b>	<b>0.08</b>	<b>\$2.91</b>	<b>\$0.00</b>	<b>2,075</b>	<b>165</b>	<b>\$6,038</b>

\* Exhibit contains rounding error.

EXHIBIT 8  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
REJECTED WASTE AND CONTAINER RESIDUES

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Rejected waste and container residues (262.34(j))</b>										
Sign Item 18c of the manifest, if the transporter returned the shipment using the original manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	346	3	\$125
Sign Item 20 of the manifest, if the transporter returned the shipment using a new manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	346	3	\$125
<b>TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>0.01</b>	<b>\$0.36</b>	<b>\$0.00</b>	<b>691.9897819</b>	<b>6</b>	<b>\$250</b>

\* Exhibit contains rounding error.

EXHIBIT 9  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR GENERATORS \*  
DEVELOPING EXCEPTION REPORTS

	Hours per Generator				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Reports	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Exception report completion, submission, and recordkeeping: LQGs (262.42(a)(1)-(II) and 262.40(b))</b>										
Prepare and submit a signed cover letter to EPA explaining the generator's efforts to locate the hazardous waste and the results of those efforts, along with a legible copy of the manifest	0.00	0.50	0.50	0.10	1.10	\$52.77	\$0.52	3,322	3,654	\$177,029
Keep a copy of each exception report	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.10	3,322	332	\$6,312
<b>Subtotal (for LQGs)</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>0.10</b>	<b>varies</b>	<b>varies</b>	<b>\$0.62</b>	<b>3,322</b>	<b>3,986</b>	<b>\$183,341</b>
<b>Exception report completion, submission, and recordkeeping: Commercial TSDFs (262.42(a)(1)-(II) and 262.40(b))</b>										
Prepare and submit a signed cover letter to EPA explaining the generator's efforts to locate the hazardous waste and the results of those efforts, along with a legible copy of the manifest	0.00	0.50	0.50	0.10	1.10	\$52.77	\$0.52	508	559	\$27,071
Keep a copy of each exception report	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.10	508	51	\$965
<b>Subtotal (for Commercial TSDFs)</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>0.10</b>	<b>varies</b>	<b>varies</b>	<b>\$0.62</b>	<b>508</b>	<b>610</b>	<b>\$28,036</b>
<b>Exception report completion, submission, and recordkeeping: Captive TSDFs (262.42(a)(1)-(II) and 262.40(b))</b>										
Prepare and submit a signed cover letter to EPA explaining the generator's efforts to locate the hazardous waste and the results of those efforts, along with a legible copy of the manifest	0.00	0.50	0.50	0.10	1.10	\$52.77	\$0.52	156	172	\$8,313
Keep a copy of each exception report	0.00	0.00	0.00	0.10	0.10	\$1.80	\$0.10	156	16	\$297
<b>Subtotal (for Captive TSDFs)</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>0.10</b>	<b>varies</b>	<b>varies</b>	<b>\$0.62</b>	<b>156</b>	<b>188</b>	<b>\$8,610</b>
<b>Exception report completion, submission, and recordkeeping: SQGs (262.42(b))</b>										
Submit a legible copy of the manifest with some indication that the waste has not been delivered	0.00	0.25	0.25	0.00	0.50	\$25.49	\$0.52	6,388	3,194	\$166,152
<b>Subtotal (for SQGs)</b>	<b>0.00</b>	<b>0.25</b>	<b>0.25</b>	<b>0.00</b>	<b>0.50</b>	<b>\$25.49</b>	<b>\$0.52</b>	<b>6,388</b>	<b>3,194</b>	<b>\$166,152</b>
<b>TOTAL (LQGs, TSDFs, and SQGs)</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>7,978</b>	<b>\$386,139</b>

\* Exhibit contains rounding error.

EXHIBIT 10  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR TRANSPORTERS \*  
READING THE REGULATIONS

	Hours per Transporter				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Transporters	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Read the regulations</b>										
Transporters	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	351	439	\$18,503
<b>TOTAL</b>	<b>0.00</b>	<b>0.25</b>	<b>1.00</b>	<b>0.00</b>	<b>1.25</b>	<b>\$52.74</b>	<b>\$0.00</b>	<b>351</b>	<b>439</b>	<b>\$18,503</b>

\* Exhibit contains rounding error.

EXHIBIT 11  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR TRANSPORTERS \*  
COMPLETING AND TRANSMITTING THE MANIFEST

	Hours per Transporter				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion, transmittal and recordkeeping: Transporters</b>										
<b>Manifest requirements for highway transporters (263.20(b), 263.20(c), 263.20(d), and 263.22(a))</b>										
Sign and date the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,901,892	19,019	\$684,681
Return a signed copy of the manifest to the generator	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,901,892	19,019	\$684,681
Ensure that the manifest (or other shipping paper) accompanies the waste to its destination	0.00	0.00	0.13	0.00	0.13	\$4.72	\$0.00	1,901,892	247,246	\$8,976,930
Obtain the date of delivery and signature of that transporter or the owner/operator of the facility or alternate facility designated on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,901,892	19,019	\$684,681
Retain a copy of the manifest	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	1,901,892	323,322	\$5,819,790
Give remaining copies of the manifest to the accepting transporter or facility	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,901,892	19,019	\$684,681
<b>Manifest requirements for person delivering to initial water transporters (263.20(e))</b>										
Obtain the date of delivery and signature of the initial water transporter on the manifest	0.00	0.00	0.00	0.01	0.01	\$0.18	\$0.00	62,700	627	\$11,286
Forward the manifest to the designated facility	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	62,700	10,032	\$206,910
<b>Manifest requirements for water (bulk shipment) transporters (263.20(e))</b>										
Ensure that the shipping paper (and Acknowledgment of Consent, for exports) accompanies the waste to its destination	0.00	0.00	0.13	0.00	0.13	\$4.72	\$0.00	62,700	8,151	\$295,944
If the delivering (water) transporter, obtain the date of delivery and signature of the owner/operator of the designated facility on either the manifest or shipping paper	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	62,700	627	\$22,572
If the initial water transporter, sign and date the manifest and return it to the delivering transporter so that the manifest can be forwarded to the designated facility owner/operator	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	62,700	627	\$22,572
Retain a copy of the manifest or shipping paper	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	62,700	10,659	\$191,862
<b>Manifest requirements for rail transporters (263.20(f) and 263.22(c))</b>										
When accepting waste from a non-rail transporter, sign and date the manifest and return or transmit a signed copy of the manifest to the non-rail transporter	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	125,399	1,254	\$45,144
Forward at least three copies of the manifest to either the next non-rail transporter, the designated facility, or the last rail transporter designated to handle the waste in the U.S.	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	125,399	20,064	\$413,817
Ensure a shipping paper containing all the information required on the manifest excluding the U.S. EPA ID number, generator certification, and signatures (and for exports an Acknowledgment of Consent) accompanies the waste	0.00	0.00	0.13	0.00	0.13	\$4.72	\$0.00	125,399	16,302	\$591,883
When delivering hazardous waste to the designated facility or to the next non-rail transporter, obtain the signature and date of delivery of the facility or non-rail transporter on the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	125,399	1,254	\$45,144
Retain a copy of the manifest and/or rail shipping paper	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	125,399	21,318	\$383,721
Before accepting hazardous waste from a rail transporter, sign and date the manifest and provide a copy to the rail transporter	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	125,399	1,254	\$45,144

EXHIBIT 11 (CONTINUED)  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR TRANSPORTERS \*  
COMPLETING AND TRANSMITTING THE MANIFEST

	Hours per Transporter				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion, transmittal and recordkeeping: Transporters</b>										
<b>Manifest requirements for transporters who transport waste into and/or out of the U.S. (263.20(g) and (i))</b>										
For imports and exports, sign and date the manifest in the International Shipments block to indicate the date that the shipment left the U.S., as required by section 263.20(g)(1)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	40,259	403	\$14,493
For imports and exports, retain a copy of the manifest, as required by section 263.20(g)(2)	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	40,259	6,844	\$123,193
For imports give copy of import manifest to TSDRF receiving facility	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	17,624	176	\$6,345
For exports, return a signed copy of the manifest to the generator, as required by section 263.20(g)(3)	0.00	0.00	0.00	0.01	0.01	\$0.18	\$0.00	19,509	195	\$3,512
For exports, give a copy of the manifest to a U.S. Customs official at the point of departure from the U.S., as required by section 263.20(g)(4)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.10	19,509	195	\$8,974
For exports, ensure that copies of the manifest and EPA Acknowledgment of Consent accompanies the waste, as required by section 263.20(a)	0.00	0.00	0.13	0.00	0.13	\$4.72	\$0.00	19,509	2,536	\$92,082
<b>Manifest requirements for transporters who transport waste pursuant to a reclamation agreement (263.20(h))</b>										
Record the waste information on a log or shipping paper	0.00	0.25	0.75	0.00	1.00	\$43.66	\$0.00	31,476	31,476	\$1,374,247
Carry the record when transporting waste to the reclamation facility	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	31,476	315	\$11,331
Retain the records	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	31,476	5,351	\$96,317
<b>Undeliverable shipments (263.21(b)(1))</b>										
Contact the generator for further directions and revise the manifest according to the generator's instructions	0.00	0.00	0.08	0.00	0.08	\$2.91	\$2.00	2,075	166	\$10,188
<b>Rejected waste and container residues (263.21(b)(2))</b>										
For partially rejected loads made while the transporter is on site, obtain the amended manifest from the facility, keep a copy, and, if receiving the rejected waste, obtain the new manifest	0.00	0.00	0.10	0.00	0.10	\$3.63	\$0.00	3,460	346	\$12,560
For fully rejected loads made or container residues identified while the transporter is on site, obtain the original manifest, as amended, from the facility	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
<b>TOTAL</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>787,162</b>	<b>\$21,577,141</b>

\* Exhibit contains rounding error.

EXHIBIT 12  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR TRANSPORTERS \*  
NOTIFYING OF DISCHARGE OF HAZARDOUS WASTE

	Hours per Transporter				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Notifications	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Notification of discharge of hazardous waste: Transporters (263.30(a))</b>										
Notify local authorities	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	849	1,061	\$44,776
<b>Notification of discharge of hazardous waste: Water (bulk shipment) Transporters (33 CFR 153.203)</b>										
Notify NRC, or a pre-designated OSC, of the discharge	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	73	91	\$3,850
<b>TOTAL</b>	<b>0.00</b>	<b>varies</b>	<b>1.00</b>	<b>0.00</b>	<b>1.25</b>	<b>\$52.74</b>	<b>\$0.00</b>	<b>varies</b>	<b>1,152</b>	<b>\$48,626</b>

\* Exhibit contains rounding error.

EXHIBIT 13  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR DESIGNATED TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs) \*  
READING THE REGULATIONS

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of TSDFs	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Read the regulations</b>										
TSDFs	0.00	0.25	1.00	0.00	1.25	\$52.74	\$0.00	546	682	\$28,789
<b>TOTAL</b>	<b>0.00</b>	<b>0.25</b>	<b>1.00</b>	<b>0.00</b>	<b>1.25</b>	<b>\$52.74</b>	<b>\$0.00</b>	<b>546</b>	<b>682</b>	<b>\$28,789</b>

\* Exhibit contains rounding error.

EXHIBIT 14  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR DESIGNATED TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs) \*  
COMPLETING THE MANIFEST (ASSISTING THE GENERATORS)

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion: Designated TSDFs (264.71(a) and (b), or 265.71(a) and (b))</b>										
Complete the manifest	0.00	0.00	0.43	0.10	0.53	\$17.43	\$0.00	1,301,175	689,623	\$22,679,480
Complete continuation sheets	0.00	0.00	0.18	0.05	0.23	\$7.44	\$0.00	65,059	14,964	\$484,039
<b>TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>\$0.00</b>	<b>1,301,175</b>	<b>704,587</b>	<b>\$23,163,519</b>

\* Exhibit contains rounding error.

EXHIBIT 15  
 ESTIMATED ANNUAL HOUR AND COST BURDEN FOR DESIGNATED TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs) \*  
 TRANSMITTING THE MANIFEST AND REPORTING TO EPA

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Manifest completion, transmittal and recordkeeping: Designated TSDFs (264.71(a) and (b), or 265.71(a) and (b))</b>										
Enter the name of the person accepting the waste and sign and date each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	1,742,594	17,426	\$627,334
Complete the management method code	0.00	0.00	0.02	0.00	0.02	\$0.73	\$0.00	1,742,594	34,852	\$1,272,094
Note any discrepancies on each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	501,425	40,114	\$1,459,147
Immediately give the transporter at least one copy of the manifest (or shipping paper)	0.00	0.00	0.17	0.00	0.17	\$6.18	\$0.00	1,742,594	296,241	\$10,769,231
Within 30 days of delivery, send a copy of the manifest (or shipping paper) to the generator (or to EPA-OECA for import manifests)	0.00	0.00	0.00	0.15	0.15	\$2.70	\$0.42	1,760,218	264,033	\$5,491,881
Retain a copy of the manifest (or shipping paper) for at least three years from the delivery date (includes import manifests)	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	1,760,218	299,237	\$5,386,267
<b>Subtotal (manifest completion, transmittal, and recordkeeping)</b>	0.00	0.00	varies	varies	varies	varies	varies	varies	951,903	\$25,005,954
<b>Compliance with State program requirements: TSDFs who are also generators (264.71(e) and 265.71(e))</b>										
<b>Commercial TSDFs</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	877	0	\$0
<b>Captive TSDFs</b>										
Contact the consignment/generator State if needed and submit any copies of the manifest to these States, as applicable	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	2,631	0	\$0
<b>Subtotal (for TSDFs)</b>	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	3,507	0	\$0
<b>Discrepancy report completion and submission: Designated TSDFs (264.72(c) or 265.72(c))</b>										
Attempt to reconcile any discrepancies	0.00	0.00	0.08	0.00	0.08	\$2.91	\$2.00	501,425	40,114	\$2,461,997
Prepare and submit a letter to EPA describing the discrepancy and attempts to reconcile it, along with a copy of the manifest or shipping paper at issue	0.00	0.10	0.17	0.10	0.37	\$14.54	\$0.52	8,023	2,969	\$120,826
<b>Subtotal (discrepancy report)</b>	0.00	varies	varies	varies	varies	varies	varies	varies	43,083	\$2,582,823
<b>TOTAL</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>994,986</b>	<b>\$27,588,777</b>

\* Exhibit contains rounding error.

EXHIBIT 16  
ESTIMATED ANNUAL HOUR AND COST BURDEN FOR DESIGNATED TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs) \*  
REJECTED WASTE AND CONTAINER RESIDUES

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Manifests	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Rejected waste and container residues (264.72(d) through (g) and 265.72(d) through (g))</b>										
<b>Rejection of Waste after the Transporter Leaves the Facility</b>										
Enter the name of the person accepting the waste and sign and date each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
Complete the management method code	0.00	0.00	0.02	0.00	0.02	\$0.73	\$0.00	34,600	692	\$25,258
Immediately give the transporter at least one copy of the manifest (or shipping paper)	0.00	0.00	0.17	0.00	0.17	\$6.18	\$0.00	34,600	5,882	\$213,825
Within 30 days of delivery, send a copy of the manifest (or shipping paper) to the generator	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.00	34,600	5,536	\$99,647
Contact the generator to obtain the generator's instructions for forwarding the waste to another facility that can manage the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$2.00	34,600	2,768	\$169,884
Prepare a new manifest for rejected loads or container residues sent to the alternate designated facility or back to the generator	0.00	0.00	0.43	0.10	0.53	\$17.43	\$0.00	34,600	18,338	\$603,069
Amend the facility's copy of the manifest to indicate the rejected wastes or residues in the discrepancy space of the amended manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
Copy the manifest tracking number from Item 4 of the new manifest to the Discrepancy space of the amended manifest	0.00	0.00	0.02	0.00	0.02	\$0.73	\$0.00	34,600	692	\$25,258
Re-sign and date the manifest	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
Retain the amended manifest for at least three years from the date of the amendment	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	34,600	5,882	\$105,874
Within 30 days, send a copy of the amended manifest to the delivering transporter and to the generator	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	34,600	5,536	\$114,179
<b>Subtotal</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>46,364</b>	<b>\$1,394,362</b>
<b>Rejection of Waste while the Transporter Remains Present at the Facility</b>										
Enter the name of the person accepting the waste and sign and date each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
Contact the generator to obtain the generator's instructions for forwarding the waste to another facility that can manage the waste	0.00	0.00	0.08	0.00	0.08	\$2.91	\$2.00	34,600	2,768	\$169,884
Complete Item 18a and 18b of the original manifest, as applicable	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	34,600	2,768	\$100,685
Retain a copy of the manifest (or shipping paper) for at least three years from the date of delivery	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	34,600	5,882	\$105,874
Give the remaining copies back to the transporter	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	34,600	346	\$12,456
<b>Subtotal</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>12,110</b>	<b>\$401,355</b>
<b>Manifest completion, transmittal and recordkeeping by Alternate TSDFs (264.71(a) and (b), or 265.71(a) and (b))</b>										
Enter the name of the person accepting the waste and sign and date each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.01	0.00	0.01	\$0.36	\$0.00	68,507	685	\$24,663
Complete the management method code	0.00	0.00	0.02	0.00	0.02	\$0.73	\$0.00	68,507	1,370	\$50,010
Note any discrepancies on each copy of the manifest (or shipping paper, if applicable)	0.00	0.00	0.08	0.00	0.08	\$2.91	\$0.00	68,507	5,481	\$199,355
Immediately give the transporter at least one copy of the manifest (or shipping paper)	0.00	0.00	0.17	0.00	0.17	\$6.18	\$0.00	68,507	11,646	\$423,373
Within 30 days of delivery, send a copy of the manifest (or shipping paper) to the generator	0.00	0.00	0.00	0.16	0.16	\$2.88	\$0.42	68,507	10,961	\$226,073
Retain a copy of the manifest (or shipping paper) for at least three years from the date of delivery	0.00	0.00	0.00	0.17	0.17	\$3.06	\$0.00	68,507	11,646	\$209,631
<b>Subtotal</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>41,789</b>	<b>\$1,133,105</b>
<b>TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>100,263</b>	<b>\$2,928,822</b>

\* Exhibit contains rounding error.

EXHIBIT 17  
 ESTIMATED ANNUAL HOUR AND COST BURDEN FOR DESIGNATED TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs) \*  
 UNMANIFESTED WASTE REPORTS

	Hours per TSDF				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Annual Number of Shipments	Total Hours	Total Cost
	Legal @ \$114.04/hr	Managerial @ \$89.44/hr	Technical @ \$58.54/hr	Clerical @ \$30.62/hr						
<b>Unmanifested waste report: completion and submission (264.7(a) and 265.7(a))</b>										
Prepare and submit to EPA a letter of the unmanifested waste within 15 days after receiving waste	0.00	0.50	1.00	0.50	2.00	\$78.14	\$0.52	203	406	\$15,968
<b>TOTAL</b>	<b>0.00</b>	<b>0.50</b>	<b>1.00</b>	<b>0.50</b>	<b>2.00</b>	<b>\$78.14</b>	<b>\$0.52</b>	<b>203</b>	<b>406</b>	<b>\$15,968</b>

\* Exhibit contains rounding error.

## EXHIBIT 18

## TOTAL ANNUAL RESPONDENT HOUR AND COST BURDEN BY TYPE OF RESPONDENT AND MANIFESTING ACTIVITY \*

	Total Hourly Burden	Total Annual Capital Costs	Total Annual O&M Costs	Total Annual Labor Costs	Total Annual Costs
<b>Registrant Organizations</b>					
Heading the regulations	4	\$0	\$0	\$176	\$176
Applying to the registry	9	\$0	\$2,885	\$352	\$3,237
Updating general information in the approved application	1	\$0	\$1	\$57	\$58
Requesting approval for a new tracking number suffix	0	\$0	\$0	\$0	\$0
Requesting approval for changes to printing specifications or use of a new printer	0	\$0	\$1,008	\$30	\$1,038
Typesetting the manifest form subsequent to its approval	0	\$0	\$0	\$0	\$0
Requesting an exemption	1	\$0	\$1	\$34	\$35
Notifying EPA of a printing specification violation	0	\$0	\$3	\$12	\$15
Revising the approved manifest if requested by EPA	0	\$0	\$0	\$0	\$0
Responding to suspension and revocation procedures	0	\$0	\$0	\$0	\$0
<b>Subtotal (Registrant Organizations)</b>	<b>15</b>	<b>\$0</b>	<b>\$3,898</b>	<b>\$661</b>	<b>\$4,559</b>
<b>Generators (LQGs, SQGs, TSDFs acting as generators)</b>					
Heading the regulations	238,284	\$0	\$0	\$10,053,699	\$10,053,699
Manifest completion (without assistance of designated TSDF)	394,328	\$0	\$0	\$12,981,223	\$12,981,223
Manifest completion (with assistance of designated TSDF)	39,035	\$0	\$0	\$1,184,070	\$1,184,070
Compliance with State program requirements	0	\$0	\$0	\$0	\$0
Manifest transmittal and recordkeeping	473,634	\$0	\$80,384	\$8,898,869	\$8,979,253
Undeliverable shipments	165	\$0	\$0	\$6,038	6,038
Rejected waste and container residues	6	\$0	\$0	\$250	\$250
Exception report completion, submission, and recordkeeping	7,978	\$0	\$5,793	\$380,346	\$386,139
<b>Subtotal (Generators)</b>	<b>1,153,430</b>	<b>\$0</b>	<b>\$86,177</b>	<b>\$33,504,495</b>	<b>\$33,590,672</b>
<b>Transporters</b>					
Heading the regulations	439	\$0	\$0	\$18,503	\$18,503
Manifest completion, transmittal, and recordkeeping (domestic + imports + exports)	786,304	\$0	\$80,953	\$21,460,984	\$21,541,937
Undeliverable shipments	166	\$0	\$4,150	\$6,038	\$10,188
Rejected waste and container residues	692	\$0	\$0	\$25,016	\$25,016
Notification of discharge of hazardous waste	1,152	\$0	\$0	\$48,626	\$48,626
<b>Subtotal (Transporters)</b>	<b>788,753</b>	<b>\$0</b>	<b>\$85,103</b>	<b>\$21,559,167</b>	<b>\$21,644,270</b>
<b>Designated TSDFs</b>					
Heading the regulations	682	\$0	\$0	\$28,789	\$28,789
Manifest completion (assisting the generators)	704,587	\$0	\$0	\$23,163,519	\$23,163,519
Manifest transmittal and recordkeeping (domestic + imports)	951,903	\$0	\$739,292	\$24,266,662	\$25,005,954
Compliance with State program requirements	0	\$0	\$0	\$0	\$0
Discrepancy report completion and submission	43,083	\$0	\$1,007,022	\$1,575,801	\$2,582,823
Rejected waste and container residues	100,263	\$0	\$181,703	\$2,747,119	\$2,928,822
Unmanifested waste report completion and submission	406	\$0	\$106	\$15,862	\$15,968
<b>Subtotal (Designated TSDFs)</b>	<b>1,800,924</b>	<b>\$0</b>	<b>\$1,928,123</b>	<b>\$51,797,752</b>	<b>\$53,725,875</b>
<b>Annualized capital costs</b>					
Purchase blank manifests from EPA-registered printer	--	\$520,800	--	--	\$520,800
Paper storage (boxes & warehousing)	--	\$448,189	--	--	\$448,189
<b>TOTAL: ALL RESPONDENTS</b>	<b>3,743,122</b>	<b>\$968,989</b>	<b>\$2,103,301</b>	<b>\$106,862,075</b>	<b>\$109,934,365</b>

\* Exhibit contains rounding error.

EXHIBIT 19  
TOTAL ANNUAL AGENCY HOUR AND COST BURDEN \*

	Hours per Agency Respondent				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Reports Received	Total Hours	Total Cost
	Legal @ \$66.26/hr	Managerial @ \$47.66/hr	Technical @ \$33.44/hr	Clerical @ \$20.34/hr						
<b>Registrant Organizations</b>										
<b>Applying to the registry (262.21(c) and 262.21(e))</b>										
Review initial application	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	3	2	\$59
Notify registrant of EPA's decision regarding its application	0.00	0.00	0.00	0.10	0.10	\$1.99	\$0.42	3	0	\$8
Review revised application	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	3	2	\$59
If application is approved, provide electronic file of the manifest, continuation sheet, and manifest instructions to approved registrant and request manifest form samples	0.00	0.00	0.00	0.10	0.10	\$1.99	\$4.18	3	0	\$21
Evaluate manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	3	2	\$59
Notify registrant of EPA's decision regarding its manifest form samples	0.00	0.00	0.00	0.10	0.10	\$1.99	\$0.42	3	0	\$8
Evaluate revised manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	2	1	\$41
<b>Updating General Information in the Approved Application (262.21(h)(1))</b>										
Review revised application	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	3	2	\$53
Review documentation submitted by registrant	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	1	1	\$18
<b>Requesting Approval for a New Tracking Number Suffix (262.21(h)(2))</b>										
Provide new tracking number suffix to registrant	0.00	0.10	0.25	0.10	0.45	\$15.03	\$0.42	0	0	\$0
<b>Requesting Approval for Changes to Printing Specifications or Use of a New Printer (262.21(h)(3))</b>										
Evaluate manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	1	1	\$18
Evaluate revised manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	1	1	\$18
<b>Typesetting the Manifest Form Subsequent to its Approval (262.21(i))</b>										
Evaluate manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	0	0	\$0
<b>Requesting an Exemption (262.21(j))</b>										
Review documentation submitted by registrant	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	2	1	\$41
<b>Notifying EPA of a Printing Specification Violation (262.21(k))</b>										
Receive notification that a serious violation of a printing specification	0.00	0.20	0.80	0.00	1.00	\$35.46	\$0.00	1	1	\$47
<b>Revising the Approved Manifest if Requested by EPA (262.21(l))</b>										
Evaluate revised manifest form samples	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	0	0	\$0
<b>Responding to Suspension and Revocation Procedures (262.21(m))</b>										
Review documentation submitted by registrant	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	0	0	\$0
<b>Subtotal (Registrant Organizations)</b>	0.00	varies	varies	varies	varies	varies	varies	varies	14	\$450

EXHIBIT 19 (CONTINUED)  
TOTAL ANNUAL AGENCY HOUR AND COST BURDEN \*

	Hours per Agency Respondent				Hours/ Respondent	Labor Cost/ Respondent	O&M Costs/ Respondent	Number of Reports Received	Total Hours	Total Cost
	Legal @ \$66.26/hr	Managerial @ \$47.66/hr	Technical @ \$33.44/hr	Clerical @ \$20.34/hr						
<b>Generators</b>										
<b>Exception report (262.42)</b>										
Review exception reports: LQGs	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	3,322	1,661	\$58,899
Review exception reports: Commercial TSDFs	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	508	254	\$9,007
Review exception reports: Captive TSDFs	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	156	78	\$2,766
Review exception reports: SQGs	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	6,388	3,194	\$113,259
<b>Subtotal (Generators)</b>	<b>0.00</b>	<b>0.10</b>	<b>0.40</b>	<b>0.00</b>	<b>0.50</b>	<b>\$17.73</b>	<b>\$0.00</b>	<b>varies</b>	<b>5,187</b>	<b>\$183,931</b>
<b>Transporters</b>										
<b>Notification of discharge (263.30(a) and (d))</b>										
Receive notifications of discharge	0.00	0.20	0.80	0.00	1.00	\$35.46	\$0.00	73	73	\$2,589
<b>Subtotal (Transporters)</b>	<b>0.00</b>	<b>0.20</b>	<b>0.80</b>	<b>0.00</b>	<b>1.00</b>	<b>\$35.46</b>	<b>\$0.00</b>	<b>73</b>	<b>73</b>	<b>\$2,589</b>
<b>Designated TSDFs</b>										
Receive import manifests (264.71(a)(3) & 265.71(a)(3))	0.00	0.00	0.10	0.00	0.10	\$3.13	\$0.00	17,624	1,762	\$55,163
<b>Discrepancy report (264.72(a) and (b) and 265.72(a) and (b))</b>										
Review designated TSDF discrepancy reports	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	8,023	4,012	\$142,248
<b>Unmanifested waste report (264.76 and 265.76)</b>										
Review designated TSDF unmanifested waste reports	0.00	0.10	0.40	0.00	0.50	\$17.73	\$0.00	203	102	\$3,599
<b>Subtotal (TSDFs)</b>	<b>0.00</b>	<b>0.10</b>	<b>0.40</b>	<b>0.00</b>	<b>0.50</b>	<b>\$17.73</b>	<b>\$0.00</b>	<b>varies</b>	<b>4,114</b>	<b>\$145,847</b>
<b>TOTAL: AGENCY</b>	<b>0.00</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>9,388</b>	<b>\$332,817</b>

\* Exhibit contains rounding error.

*Three Year Burden* 28,164 \$998,451

Annual respondent + agency burden = 3,752,510 \$110,267,632

This Exhibit presents a summary of the reasons for change in burden hour estimates between the prior approved RCRA manifest ICR 801.15 (30 December 2004), compared to the revised RCRA manifest ICR 801.15. The primary drivers behind the changes listed in the Exhibit below are changes (i.e. decrease or increase) in estimated: (a) numbers of affected entities, (b) annual numbers of affected manifests, (c) per-manifest burden hours associated with an activity

Exhibit 20 Summary of Changes in Burden Hour Estimates Between ICR 801.15 Compared to ICR 801.16 (Decreases in burden hour estimates are shown in parentheses)				
Changes in ICR 801.16		Burden Hours in ICR 801.15	Burden Hours in ICR 801.16	Change in Annual Burden Hours in ICR 801.16
A. Respondent Burden:				
1	Decrease in the number of entities applying to the manifest registry	47	15	(32)
2	Increase in generators reading the regulations at 40 CFR 262	164,754	238,284	73,480
3	Decrease in LQGs completing manifests and continuation sheets without assistance of designated TSDFs	235,918	197,133	(38,785)
4	Decrease in TSDFs completing manifests and continuation sheets without assistance of designated TSDFs	74,269	71,861	(2,408)
5	Increase in SQGs completing manifests and continuation sheets without assistance of designated TSDFs	81,404	125,334	43,930
6	Decrease in manifests completed by LQGs with assistance of designated TSDFs	10,020	8,372	(1,648)
7	Increase in manifests completed by SQGs with assistance of designated TSDFs	19,915	30,663	10,748
8	Decrease in manifests transmitted and recordkept by LQGs	180,739	151,402	(29,337)
9	Decrease in manifests transmitted and recordkept by TSDFs	31,336	30,338	(998)
10	Increase in manifests transmitted and recordkept by SQGs	190,258	291,894	101,636
11	Increase in manifests that accompany undeliverable shipments	141	165	24
12	Increase in exception reports	7,672	7,978	306
13	Decrease in transporters reading the regulations at 40 CFR 263	518	439	(79)
14	Increase in manifests associated with hazardous waste transporters	659,824	786,304	126,480
15	Increase in manifests that accompany undeliverable shipments	141	166	25
16	Increase in manifests associated with with rejected loads and container residues at 40 CFR 263.21(b)(2)	586	692	106

Exhibit 20				
Summary of Changes in Burden Hour Estimates Between ICR 801.15 Compared to ICR 801.16 (Decreases in burden hour estimates are shown in parentheses)				
Changes in ICR 801.16		Burden Hours in ICR 801.15	Burden Hours in ICR 801.16	Change in Annual Burden Hours in ICR 801.16
17	Decrease in TSDFs reading the regulations at 40 CFR 264 & 265	726	682	(44)
18	Increase in TSDFs assisting generators to complete their manifests & continuation sheets	540,329	704,587	164,258
19	Increase in manifests received by designated TSDFs	945,820	951,903	6,083
20	Decrease in discrepancy reports	36,549	43,083	6,534
21	Increase in the number of manifests associated with rejected loads and container residues at 40 CFR 264.72 & 265.72	85,012	100,263	15,251
22	Increase in unmanifested shipments	346	406	60
Sub-Total Respondent Burden =		3,264,991	3,743,122	478,131
B. Agency Burden		7,993	9,388	1,395
Resultant Overall Annual Burden Hours (Respondents + Agency) =		3,275,475	3,752,510	477,035
Resultant Overall 3-Year Burden Hours (Respondents + Agency) =		9,826,425	11,257,530	1,431,105