

**1 Statement Supporting the Renewal of the Information
Collection Procedure for Local Planning Requirements
and Facility Emergency Release Notification**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

Emergency Planning and Release Notification Requirements under Emergency Planning and Community Right-to-Know Act Sections 302, 303, and 304 (Renewal)
EPA No. 1395.08, OMB No. 2050-0092

1(b) Short Characterization

This information collection request (ICR) was previously approved as OMB No. 2050-0092 through July 31, 2012. The Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) establishes authorities for emergency planning and preparedness, emergency release notification reporting, community right-to-know reporting, and toxic chemical release reporting.

Under the emergency planning provisions of EPCRA, codified in 40 CFR part 355 requires any facility where an extremely hazardous substance (EHS) is present in an amount at or in excess of the threshold planning quantity (TPQ) to notify the state emergency response commission (SERC) and local emergency planning committee (LEPC) by May 17, 1987. This activity has been completed; the section 302 costs and burden hours for this ICR, therefore, reflect only the estimate of the cost and burden incurred by new facilities that have an EHS in excess of the TPQ during the period covered by this ICR.

EPCRA section 303 requires LEPCs to prepare emergency plans for facilities that have EHSs in excess of the TPQs in their local planning district. Facilities are required to provide local planners with information necessary for the preparation of emergency plans. In addition, the facilities are required to inform LEPCs of any relevant changes in chemical use or production that may affect the emergency plans. Section 303 requires LEPCs to complete their emergency plans by October 17, 1988. This ICR therefore reflects the costs attributable to the requirement of annually updating the local emergency response plans required under section 303(a).

Emergency release notification provisions under EPCRA section 304, codified in 40 CFR part 355 requires facilities to report to SERCs and LEPCs releases in excess of quantities established by EPA. Facilities are required to report releases above the reportable quantity (RQ) of any EHS or hazardous substance defined under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) section 101. Notice of release must be given to both the LEPC and SERC. In addition, facilities must provide a written follow-up report providing additional information on the release, its impacts, and any actions taken in response.

EPA estimates that 95,000 facilities (23,750 manufacturers and 71,250 non-manufacturers) are subject to reporting under EPCRA section 302 and 3,456 SERCs and LEPCs are subject to section 303. EPA estimates that approximately 12,000 release notifications are made annually under section 304 to SERC and LEPC. The total burden to facilities over the three year information collection period is estimated to be 481,050 hours (160,350 hours annually), at a cost of \$27.3 million (\$9.1 million

annually), with an associated state and local burden of 320,568 hours (106,856 hours annually), at a cost of \$13.2 million (4.4 million annually).

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

The authority for these requirements is EPCRA sections 302, 303, and 304 (42 U.S.C. '11002, 11003, and 11004).

Section 302 of EPCRA required the EHS list to be "the same list as the list published in November 1985 by the Administrator in Appendix A of the 'Chemical Emergency Preparedness Program Interim Guidance'." The section further required EPA to "publish an interim final regulation establishing a threshold planning quantity for each substance on the list..." If EPA failed to publish the interim final rule, "the threshold planning quantity for the substance shall be 2 pounds until such time as the Administrator publishes regulations establishing a threshold for the substance."

The interim final rule was published in the Federal Register on November 17, 1986 (51 FR 41570), followed by a final rule published on April 22, 1987 (52 FR 13378). The EHS list consisted at that time of 406 chemicals, and the TPQs ranged from one pound to ten thousand pounds. There are currently 355 chemicals on the EHS list.

The EHS list along with the TPQs is used to designate facilities for initial screening for the local emergency planning process. Section 303 of EPCRA requires facilities that have to provide the notification under section 302 to designate a facility coordinator to the LEPC and to "promptly provide information to [the LEPC] necessary for developing and implementing the emergency plan." In this manner, the LEPC determines the potential scope of a response and, therefore, the amount of effort necessary for emergency planning. The LEPC will review its plan annually and incorporate any changes or additions. These emergency plans increase the local response and preparedness capability by allowing local planners to work with industry in their community, to determine the level of preparedness necessary for a response if a release should occur.

Under section 304, respondents are required to notify the LEPC and SERC of releases of EHSs or hazardous substances (as identified under CERCLA) above the reportable quantity. The purpose of the reporting is to allow response agencies to determine whether their assistance is needed in handling the response action. The facility must provide a written follow-up report.

2(b) Practical Utility/Users of the Data

The information provided by facilities under sections 302, 303, and 304 is provided to the SERCs and LEPCs. Individuals can obtain the information by contacting the SERCs and LEPCs. The information provided under sections 302 and 303 is used to increase the community's level of preparedness to respond to releases of chemicals in their community. The information is also made available to the public to allow individuals to practice their "right-to-know" about the hazards posed by chemicals in their community.

The information provided under section 304 is the trigger to activate the community's chemical emergency response system. The written follow-up report is to update and clarify the information provided in the initial call. It is also made available to the public so that the community can understand what happened during the release.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

Currently, there are no federal reporting requirements comparable to sections 302, 303, and 304 of EPCRA. Release reporting under CERCLA section 103 is an emergency notification to the National Response Center (NRC), while release reporting under section 304 is directly to local and state entities. The follow-up report required under section 304 is also unique.

3(b) Consultations

EPA contacted the following industry representatives to develop an estimate for the burden for section 304 reporting. The representatives were asked to estimate the time it took make their notifications to the NRC, SERC, and LEPC. In addition, if their release(s) required an EPCRA section 304 follow-up report, an estimate of the effort required to produce that report.

Eastman Kodak Co.
Rochester, NY 14652
Stephen Zapf
(585) 722-2663

Honeywell International, Inc.
Hopewell, VA 23860
Kenneth Tomko
(804) 541-5735

Dow Chemical
Midland, MI 48674
Chris Arnold
(989) 636-4400

Citgo Refinery
Lemont, IL 60439
Leo Cleveland
(630) 257-4381

Koch Nitrogen
Enid, OK 73701
Michael Hammons
(580) 478-3473

Missouri American Water Company
Chesterfield, MO 63017
Tim Ganz,

(314) 606-2333

Chevron Products Company
Richmond, CA 94801
Juan Li
(510) 242-2112

Weyerhaeuser Co.
Longview, WA 98632
Brian Wood
(360) 636-7080

3(c) Public Notice

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), the Agency notified the public through a Federal Register notice on the re-submission of this ICR on February 16, 2012 (77 FR 9235). EPA did not receive any comments.

3(d) Effects of Less Frequent Collection

The reporting deadlines for sections 302, 303, and 304 are set by statute. EPA has no authority to allow less frequent collection.

3(e) General Guidelines

The collection activities specified in this renewal ICR adhere to the guidelines specified by OMB.

3(f) Confidentiality

The respondent may claim specific chemical identities as trade secret in the notification to LEPC on information for developing and implementing the emergency response plan, under Section 303(d)(2) and (d)(3). Such information must be submitted according to EPCRA sections 322 and 323 (40 CFR Part 350).

All trade secrecy claims submitted to EPA under EPCRA are handled and stored according to procedures set out in the *Manual for Physical Handling, Security, And Protection of Files Containing Trade Secret Claims Submitted under Sections 303, 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA, March 2010)*. These procedures were developed expressly for EPCRA trade secrecy claims with the knowledge that these documents are sensitive. Handling and review of documents containing EPCRA trade secret information is permitted only by persons who have obtained formal clearance to access the information based on a work-related need to engage in these activities. When not being processed or reviewed by authorized individuals, the claim submissions containing trade secret information are stored in restricted access areas. To ensure that appropriate handling procedures are activated and the confidentiality of EPCRA trade secret submissions is maintained, the Agency attaches a cover sheet to the top of each trade secret document and otherwise marks the document to clearly identify the document as EPCRA confidential.

3(g) Sensitive Questions

The information gathering activities under this renewal ICR do not involve any sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

Sections 302, 303, and 304 are applicable to all facilities that either have present or release the regulated substances. These sections apply to facilities in both the manufacturing and non-manufacturing sectors. EPCRA, as written, does not apply to federal facilities. However, Executive Order 12856 requires all federal agencies to comply with the law.

Facilities in the following major group of NAICS codes may be subject to either or both implementing regulations under EPCRA section 302 and 304. There may be other facilities covered by these regulations, but not listed. Major groups that may be subject are: 11 (Agriculture, Forestry, Fishing and Hunting), 22 (Utilities), 31-33 (Manufacturing), 43 (Wholesale Trade), 44- 45 (Retail Trade), 48-49 (Transportation and Warehousing).

4(b) Information Requested

4(b)(i) Data Items

Facilities newly subject to section 302 must notify their SERC and LEPC of their reporting obligation. Under section 303, the facility must designate a coordinator and provide "information to (the LEPC) necessary for developing and implementing the (LEPC's) emergency plan." The amount of information necessary to fulfill this requirement is determined by the facility and the LEPC. If a facility has very low likelihood of having a release that would impact the community, the LEPC would probably require very little information for emergency planning. However, if the facility is a large chemical plant or is in close proximity to a populated area, the LEPC most likely will develop extensive planning (especially if the facility is anticipating an offsite response). Information requested for the plan would likely include:

- Names, hazards, quantities, and storage information for hazardous chemicals on-site;
- Methods and procedures to be followed by facility owners and operators to respond to a release;
- Description of emergency equipment;
- Methods for determining the occurrence of a release, and the area or population likely to be affected by the release; and
- Procedures to provide reliable, effective, and timely notification.

LEPCs were required to have their plans completed by October 17, 1988. Therefore, only facilities newly subject to these requirements would have to provide this information. Facilities already subject would only have to update the LEPC if the information that they have already provided changes.

Under section 304, respondents are required to notify the LEPC and SERC of releases of EHSs or hazardous substances (as identified in CERCLA section 101) above the reportable quantity. The notice must include the following information, to the extent that it is known:

- The chemical name or identity of any substance involved in the release;
- An indication of whether the substance is on the list of EHSs;
- An estimate of the quantity of any such substance that was released into the environment;
- The time and duration of the release;
- The medium or media into which the release occurred;
- Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordinator pursuant to the emergency plan); and
- The name and telephone number of the person or persons to be contacted for further information.

The facility must provide a written follow-up report that includes the information above and any updates. Also, additional information must be given:

- Actions taken to respond to and contain the release;
- Any known or anticipated acute or chronic health risks associated with the release; and
- Where appropriate, advice regarding medical attention necessary for exposed individuals.

4(b)(ii) Respondent Activities

To determine if a facility is subject to section 302, the facility would need to review the EHS list to determine if it has any of the 355 chemicals on-site. The facility would then need to look at the inventory of any EHSs it may have on-site and compare it to the TPQ. If the facility has an EHS above the TPQ, the facility would need to contact (preferably in writing) their SERC and LEPC to notify them of their reporting obligation.

To comply with section 303, the designated facility coordinator would have to work with the LEPC to ensure that the community has an adequate plan to respond to emergencies that would involve their facility. Facility coordinators may be asked to serve as an industry representative to the LEPC.

To comply with section 304, the facility would need to determine, when an EHS or a CERCLA hazardous substance is being released, if the quantity of the chemical released is greater than the reportable quantity; this information needs to be provided in the initial telephone notification to the SERC and LEPC. The material safety data sheet (MSDS) or other information that the facility has would provide the health risks and medical information, as well as response information.

The written follow-up notice needs to be filed "as soon as practical after a release." This notice documents and updates the information provided in the initial notification. Because the initial notification should be provided immediately after the discovery of the release, the written follow-up notice allows the facility more time to determine with greater precision the information provided in the initial notification. The facility may include a copy of its own internal report of the circumstances of the accident.

5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

No information provided under sections 302, 303, and 304 is sent to EPA. All of the information is kept at the state or local level.

5(b) Collection Methodology and Management

EPA does not receive the data; therefore, EPA does not have any special data collection methodology and management. However, to assist SERCs and LEPCs in their information management practices and emergency planning, EPA and the National Oceanic and Atmospheric Administration have created the Computer Aided Management of Emergency Operations (CAMEO) database.

5(c) Small Entity Flexibility

There are no special allowances made for small businesses in the regulations for sections 302, 303, and 304. The burden hours for small businesses are considered to be smaller than those for large facilities because of the reduced number of chemicals and processes present at smaller facilities.

5(d) Collection Schedule

The frequency of collection for these sections of EPCRA is required by statute. Facilities are required to report any relevant changes when they occur. Under section 304, releases of EHSs and CERCLA hazardous substances in excess of the reportable quantity must be reported "immediately" after the owner/operator has knowledge that they occurred. The written follow-up notice is required "as soon as practicable after the release."

6. ESTIMATING THE BURDEN AND COST OF COLLECTION

6(a) Estimating Respondent Burden

EPA estimated the respondent burden hours and costs associated with all recordkeeping and reporting requirements covered in EPCRA sections 302, 303, and 304. Unit burden and costs were

estimated by labor category required for each of the tasks performed by facilities under 40 CFR Part 355, and tasks performed by LEPCs under EPCRA section 303.

EPA estimates that approximately, 95,000 facilities are subject to sections 302 and 303. EPA estimates that approximately 25 percent of these facilities are manufacturers (23,750) and 71,250 facilities are non-manufacturers. We do not expect any new facilities to be in compliance during this ICR period based on the data obtained from few SERCs we contacted. Number of facilities subject to section 302 fluctuates from year-to-year. We assume that this is due to facilities using chemicals that are less hazardous or keeping inventory down.

The number of notifications under section 304 was based on the number of reports of CERCLA hazardous substance and EHS releases reported to the National Response Center in 2011, approximately 12,000.

Exhibit 1 presents the estimated unit burden by labor category required for each of the tasks performed by facilities under 40 CFR Part 355, and tasks performed by LEPCs under EPCRA section 303.

Read and Understand Regulations

EPA assumes that only newly regulated facilities incur the cost of reading and understanding regulations at 40 CFR Part 355. As explained above, we do not expect any new facilities to come into compliance in the period covered by this ICR based on information we received from few SERCs. Therefore, EPA did not estimate any burden for this activity for new facilities. All currently regulated facilities are already familiar with the regulations and the burden for this activity was estimated in previous ICRs.

Emergency Planning by Facilities (40 CFR 355.30)

All newly regulated facilities must first determine whether they have at least a threshold planning quantity of an EHS. All newly regulated facilities are required to notify the SERC and designate a facility representative. As mentioned above, we do not expect any new facilities to be in compliance in this ICR period. Currently covered facilities already completed this activity.

Because few facilities have significant changes that would affect emergency planning, EPA estimates that only ten percent of all subject facilities will be required to inform LEPCs of any changes at the facility. EPA assumes that only manufacturers may have changes occurring at the facilities which require notification to the LEPCs.

In addition, because little information is required from facilities after the initial submittal, EPA also estimates that only five percent of all subject facilities will provide additional information to LEPCs either to develop or implement emergency plans. The burden associated with providing local governments with updated information for planning purposes is assumed to be a small percentage of the initial burden for contributing to planning efforts. EPA estimates that it may take 13.0 hours for currently covered facilities to inform LEPC of any changes relevant to emergency planning and to provide information to the LEPC requests to develop emergency response plans. (See Exhibit 1).

Emergency Release Notification by Facilities (40 CFR 355.40)

The number of annual reportable quantity (RQ) releases based on the number of CERCLA hazardous substance and EHS releases reported in the National Response Center for 2011, is approximately 12,000. EPA estimates 90 percent of RQ releases require notifying LEPCs and SERCs, and 10 percent require notifying the 911 operator. All reportable releases require a written follow-up report.

For this ICR, EPA contacted few industries that reported releases to the National Response Center (see Section 3(b) of this document), to determine the actual burden incurred to comply with initial notification and written follow-up requirements in Section 304 of EPCRA. EPA's estimates in previous ICRs were slightly lower than the burden reported by these industries. EPA has calculated an average of the numbers reported by industries to use in this ICR. The burden per respondent for initial notification is approximately 0.50 hours, for written follow-up, it is approximately 8.0 hours. EPA estimates that it takes approximately 0.25 hours to report a transportation-related release to the 911 operator.

Emergency Response Plan Development by SERCs and LEPCs (40 CFR 300.215)

Emergency Response Plans must be reviewed and updated annually. EPA estimates that SERCs review all LEPC plans over a three-year period. EPA contacted few LEPCs to determine the burden associated with reviewing or updating their emergency response plan. Based on information from LEPCs, the time required to update plans varies from 18 to 40 hours. To develop an estimate, EPA assumed that the largest 120 LEPCs would spend 40 hours a year and the smaller LEPCs would spend 20 hours a year; a weighted average of 21 hours was obtained for the recordkeeping burden to keep records of all Emergency Response Plans.

Similarly, a weighted average was developed for recordkeeping associated with release reports. The LEPC with a large concentration of chemical plants indicated that it spent a month on release notification; the other LEPCs indicated that this activity took five hours a year at most. A weighted average of 10 hours was developed for the annual burden for each of the LEPCs (3,400) and SERCs (56). This burden is same as what was estimated in the previous ICR.

6(b) Estimating Respondent Costs

Estimating costs to respondents on an annual basis is accomplished by multiplying the respondent burden estimates for each labor category by the corresponding labor rate for that category. Unit costs for each respondent or activity are then multiplied by the number of respondents or activities performed on an annual basis to yield a total cost for each information collection activity in Section 6(d). These costs are shown in Exhibit 1.

EPA estimates an hourly respondent labor cost for manufacturing facility respondents of \$62.94 for managerial staff, \$59.64 for technical staff, and \$25.52 for clerical staff, including wages and benefits. Hourly respondent labor costs for non-manufacturing facility respondents are estimated at \$57.10 for managerial staff, \$45.34 for technical staff, and \$22.92 for clerical staff.

EPA estimates an hourly respondent labor cost (including overhead) for LEPCs and SERCs of \$49.59 for managerial staff, \$48.67 for technical staff, and \$28.46 for clerical staff. EPA consulted Bureau of Labor and Statistics, December 2011 for wage and labor rates.

Total burden hours and costs for the ICR are shown in Exhibit 2.

Capital and O&M Costs

Capital costs incurred by state and local agencies were estimated in the previous ICR. Capital costs include the cost of space required to store information in filing cabinets. Life expectancy for file cabinets is assumed to be 15 years. Therefore, the Agency did not develop any cost for this since it was developed in the previous ICR.

Operating and maintenance costs are limited to mailing costs. Facilities are assumed to incur postage costs for the following activities:

- Providing information to the LEPC as required under EPCRA section 303(d)(3).
- Submitting written follow-up notice (assume about 4 pages per report)

Facilities are expected to incur long distance charges when notifying SERCs. This estimate affects notification of the SERC of any RQ release. Long distance charges are estimated to be \$3.50 per fifteen-minute call.

LEPCs are assumed to incur postage costs for the following activities:

- Submitting Emergency Response Plans to the SERCs for review.
- Submitting Emergency Response Plans as requested by SERCs to federal regional response teams for review

Postage is estimated to cost \$0.45 for a first class letter and \$5.15¹ to submit a LEPC plan (plan is up to 500 pages and weighs up to 5 pounds).

Operation and maintenance costs are shown in Exhibit 3.

6(c) Estimating Agency Burden and Cost

EPA estimates no annual Agency burden associated with this ICR. Only state and local government entities implement the program in sections 302, 303, and 304 of EPCRA.

6(d) Estimating Total Annual Respondent Burden and Costs

Exhibit 2 presents the respondent burden for each information collection activity and for the sum of all information collection activities performed by each respondent type. The total average annual burden to facility respondents is 160,350 hours at a cost of \$9.1 million (or 481,050 hours at a cost of \$27.3 million for three years). The total average annual respondent burden for state and local governments is 106,856 hours at a cost of \$4.4 million (or 320,568 hours at a cost of \$13.2 million for three years). These burden estimates are summarized in Exhibit 2.

¹ **Priority Mail® Window Flat Rate Envelope**
USPS-Produced Envelope: 10" x 5"

6(e) Bottom Line Burden Hours and Cost

See Exhibit 4, below.

6(f) Reasons for Change in Burden

The number of respondents increased by 12,000 from the previous ICR. This is due to an increase in the number of reports of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) hazardous substance and Extremely Hazardous Substance (EHS) releases reported to the National Response Center in 2011. There is a decrease of 28,550 hours from the previous ICR due to adjustments for current burden estimates. There is a decrease of \$8,392 O&M costs which is also due to making estimates at current levels.

Burden incurred by LEPCs remain the same as in the previous ICR. Labor and wage rates are adjusted to the current data available on BLS, December 2011.

6(g) Burden Statement

As explained in the previous sections of this document, EPA does not expect any new facilities to come into compliance during this ICR period. This ICR only covers periodic reporting or updates of information submitted previously by existing facilities. The average reporting burden for a limited number of existing facilities, to inform the LEPC of any changes at the facility that may affect emergency planning is 2.0 hours. The average reporting burden for facilities to provide information to LEPC is 11.0 hours. The average reporting burden for facilities reporting releases under 40 CFR 355.30 is estimated to average approximately 9 hours per release, including the time for determining if the release is a reportable quantity, notifying the LEPC and SERC, or the 911 operator, and developing and submitting a written follow-up notice. There are no record-keeping requirements for facilities under EPCRA Sections 302-304. The total burden to facilities over three years is 481,050 hours at a cost of \$27.3 million.

The average burden for emergency planning activities is 21 hours per plan for LEPCs, and 16 hours per plan for SERCs. Each SERC and LEPC is also estimated to incur an annual record keeping burden of 10 hours. The total burden to LEPC and SERC over three years is 320,568 hours at a cost of \$13.2 million.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2.4 hours per response.

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

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 Number EPA-HQ-SFUND-2005-0008, which is available for online viewing at www.regulations.gov, or in person viewing at the Superfund Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center 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 the Superfund Docket is (202) 566-0276. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-SFUND-2005-0008 and OMB Control Number 2050-0092 in any correspondence.

APPENDIX A
Exhibit 1
Section 302, 303, and 304 Reporting and Recordkeeping Requirements
Estimated Unit Burden and Cost

| Information Collection Activity | Annual Hours Burden | | | Total Hours Burden | Annual Cost |
|---|---------------------|-----------|----------|--------------------|-------------|
| | Management | Technical | Clerical | | |
| EMERGENCY PLANNING (40 CFR 355.10) (Facilities) | | | | | |
| Inform LEPC of changes to facility that may affect emergency planning | 0.50 | 1.00 | 0.50 | 2.00 | \$103.87 |
| Provide information to LEPC, as required | 2.00 | 8.00 | 1.00 | 11.00 | \$628.52 |
| EMERGENCY RELEASE NOTIFICATION (40 CFR 355.30) (Facilities) | | | | | |
| Determine if a release is an RQ | 0.10 | 0.10 | 0.00 | 0.25 | \$12.25 |
| Notify LEPC and SERC of any RQ release | 0.50 | 0.00 | 0.00 | 0.50 | \$31.47 |
| Develop and submit written follow-up notice | 1.50 | 5.00 | 1.50 | 8.00 | \$430.89 |
| Notify 911 operator of transportation-related releases | 0.25 | 0.00 | 0.00 | 0.25 | \$15.74 |
| EMERGENCY RESPONSE PLANS (EPCRA section 303) | | | | | |
| Update Emergency Response Plans (LEPCs) | 5.00 | 15.00 | 1.00 | 21.00 | \$1,006.46 |
| Review Emergency Response Plans (SERCs) | 4.00 | 12.00 | 0.00 | 16.00 | \$782.40 |
| Keep records and make them available to the public | 0.00 | 0.00 | 10.00 | 10.00 | \$284.60 |

Exhibit 2
Section 302, 303, and 304 Reporting and Recordkeeping Requirements
Estimated Annual Burden and Cost

| Information Collection Activity | Number of Respondents | Annual Hours Burden | | | Total Hours Burden | Annual Cost |
|--|-----------------------|---------------------|-----------|----------|--------------------|--------------------|
| | | Management | Technical | Clerical | | |
| RULE FAMILIARIZATION (Facilities) | | | | | | |
| Read and understand regulations at 40 CFR Part 355 | 0 | 0 | 0 | - | 0 | 0 |
| Subtotal | - | - | - | - | 0 | 0 |
| EMERGENCY PLANNING (355.30) (Facilities) | | | | | | |
| Calculate if chemicals meet/exceed TPQ | 0 | 0 | 0 | 0 | 0 | 0 |
| Notify SERC that facility is subject to emergency planning | 0 | 0 | 0 | 0 | 0 | 0 |
| Designate facility representative and notify LEPC | 0 | 0 | 0 | 0 | 0 | 0 |
| Inform LEPC of facility changes that may affect emer. Planning | 9,500 | 4,750 | 9,500 | 4,750 | 19,000 | \$986,765 |
| Provide information to LEPC, as required | 4,750 | 9,500 | 38,000 | 4,750 | 52,250 | \$2,985,470 |
| Subtotal | | | | | 71,250 | \$3,972,235 |
| EMERGENCY RELEASE NOTIFICATION (355.40) (Facilities) | | | | | | |
| Determine if release is an RQ | 12,000 | 1,200 | 1,200 | 0 | 2,400 | \$147,000 |
| Notify LEPC and SERC of any RQ release | 10,800 | 5,400 | 0 | 0 | 5,400 | \$339,876 |
| Develop and submit written follow-up notice | 10,800 | 16,200 | 54,000 | 10,800 | 81,000 | \$4,653,612 |
| Notify 911 operator of transportation-related releases | 1,200 | 300 | 0 | 0 | 300 | \$4,722 |
| Subtotal | | | | | 89,100 | \$5,145,210 |
| EMERGENCY RESPONSE PLANS (300.215) (SERCs, LEPCs, and RRTs) | | | | | | |
| Update Emergency Response Plans (LEPCs) | 3,400 | 17,000 | 51,000 | 3,400 | 71,400 | \$3,421,964 |
| Review Emergency Response Plans (SERCs) | 56 | 224 | 672 | 0 | 896 | \$43,814 |
| Keep records and make them available to the public | 3,456 | 0 | 0 | 34,560 | 34,560 | \$983,577 |
| Subtotal (SERCs and LEPCs) | | | | | 106,856 | \$4,449,355 |

APPENDIX A

Exhibit 3

Capital/Start-up and O& M Costs (*Annual*) Facilities, SERCs and LEPCs

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| | | |
| | | |

Exhibit 4

Summary of Total *Annual* Burden and Cost Estimates

| | Burden Hours | Labor | O & M |
|-----------------|----------------|---------------------|-----------------|
| Facilities | 160,350 | \$9,117,445 | \$43,327 |
| SERCs and LEPCs | 106,856 | \$4,448,335 | \$17,000 |
| Total | 267,206 | \$13,565,780 | \$60,327 |