

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 2557.01
“Internet Posting and Confidentiality Determinations for Hazardous Waste Export
and Import Documents Proposed Rule”**

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Office of Resource Conservation and Recovery
United States Environmental Protection Agency
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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This information collection request (ICR) is entitled “Internet Posting and Confidentiality Determinations for Hazardous Waste Export and Import Documents Proposed Rule” EPA ICR Number 2557.01, OMB Number 2050-NEW.

1(b) Short Characterization

The companion Hazardous Waste Export-Import Revisions Final Rule¹ (“Revisions” rule) is the culmination of work between the United States, the Organization for Economic Cooperation and Development (OECD), and several non-governmental organizations (NGOs) to strengthen and harmonize the various controls on transboundary movements of hazardous wastes, as well as the controls on some non-hazardous wastes such as spent lead-acid batteries (SLABs).

One of the primary aims of the Revisions rule is to improve the reporting of transboundary shipments of hazardous waste. Improved reporting will lead to better data availability and quality, which will help enhance existing environmental and occupational health controls associated with the transboundary movement, disposal, and recovery of hazardous and non-hazardous wastes. The rule improves existing reporting requirements by mandating that all reporting be completed and sent to EPA electronically. EPA will build an IT system to facilitate this electronic reporting.

Since this electronic reporting system will be implemented in stages over the next several years, EPA is proposing under this rule (“Website” rule) to require that hazardous exporters and receiving facilities of hazardous waste from foreign sources post confirmations of receipt and confirmations of recovery or disposal to a publicly available website until electronic submittal to EPA of confirmations of receipt and confirmations of recovery or disposal for hazardous waste shipments will be required in the electronic reporting system.. During the period between the implementation of the Revisions rule and the complete implementation of the electronic system, these proposed changes will improve information on the movement and disposition of hazardous wastes, and will enable interested members of the community and the government to benefit from the provision of publicly accessible data to better monitor proper compliance with EPA’s hazardous waste regulations and help ensure that hazardous waste import and export shipments are properly received and managed. .

The pertinent details of the rule are outlined below. For further information regarding the historical context and details of this rulemaking, please refer to the Preamble to the rule.

REGULATORY CHANGES/AMENDMENTS

A. Changes to 40 CFR Part 262, Subpart H

(1) Exporters of hazardous waste and receiving facilities of hazardous waste from foreign sources must post confirmations of receipt and confirmations of recovery

¹U.S. EPA. 2016. Regulatory Impact Analysis: Hazardous Waste Export-Import Revisions Final Rule.

or disposal to a publicly available website during the period between the implementation of the Hazardous Waste Export-Import Revisions Rule and the complete implementation of the electronic reporting system.

The proposed rule will require exporters and receiving facilities of hazardous waste from foreign sources to post confirmations of receipt and confirmations of recovery or disposal to a publicly available website during the period between the implementation of the Hazardous Waste Export-Import Revisions Rule and the implementation of the electronic reporting system. Transporters and recognized traders will not be impacted by this change.

(2) Exporters of hazardous waste and receiving facilities of hazardous waste from foreign sources must develop a publicly available website if a website is not available.

The rule will require all exporters and importers that do not have a publically available website to develop a website to post confirmations of receipts and recovery during the period between the implementation of the Revisions rule and the complete implementation of the electronic reporting system.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The requirements covered in this ICR are necessary for EPA to oversee the international trade of hazardous wastes. EPA is promulgating the above regulatory changes/amendments under the authority of Sections 1006, 1007, 2002(a), 3001-3010, 3013-3015, and 3017 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), and as amended by the Hazardous and Solid Waste Amendments, 42 U.S.C. 6905, 6906, 6912, 6921-6930, 6934, and 6938.

2(b) Practical Utility and Users of the Data

The Office of Enforcement and Compliance Assurance, U.S. EPA, uses the information provided by each U.S. exporter, receiving facility, transporter, and recognized trader to determine compliance with the applicable RCRA regulatory provisions. In addition, the information is used to determine the number, origin, destination, and type of exports from and imports to the U.S. for tracking purposes and for reporting to the OECD. This information also is used to assess the efficiency of the program.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

None of the information required by the final rule will duplicate information required by existing RCRA regulations.

3(b) Public Notice

In compliance with the Paperwork Reduction Act of 1995, EPA plans to publish the proposed rule in October 2016 for a 60-day public comment period. To assist the public in commenting on the proposal, EPA raised a number of issues in the Preamble to the Rule and asked for the public to comment on these issues. At the end of the comment period, EPA will review and address the public comments received in the final Regulatory Impact Analysis and ICR supporting statement.

3(c) Consultations

EPA did not consult with any organizations in the development of this ICR.

3(d) Effects of Less Frequent Collection

EPA has carefully considered the burden imposed upon the regulated community by the proposed Website rule. EPA is confident that the activities required of respondents are necessary, and to the extent possible, has attempted to minimize the burden imposed. EPA believes that if the minimum requirements specified under the regulations are not met, EPA and the public will be less able to monitor the compliance of exporter and receiving facilities' compliance with EPA's hazardous waste regulations and less able to ensure that hazardous waste shipments are properly received and disposed of in an environmentally sound manner..

3(e) General Guidelines

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, EPA's Information Collection Request Handbook, and other applicable OMB guidance.

3(f) Confidentiality

Section 3007(b) of RCRA and 40 CFR Part 2, subpart B, which defines EPA's general policy on public disclosure of information, contain provisions for confidentiality. EPA is also proposing confidentiality determinations and will no longer accept future CBI claims for certain documents related to the export, import, and transit of hazardous waste and export of excluded CRTs. Our rationale is explained in the proposed rule. However, if such a claim were asserted, EPA must and will treat the information in accordance with the regulations cited above. EPA also will assure that this information collection complies with the Privacy Act of 1974 and OMB Circular 108.

3(g) Sensitive Questions

No questions of a sensitive nature are included in the information collection requirements associated with the rule.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

The revisions to the hazardous waste export and import requirements under the rule affect all recycling and disposal facilities who receive imports of hazardous waste and all persons who export or import (or arrange for the export or import) hazardous waste being shipped for either recycling or disposal, SLABs being shipped for reclamation, industrial ethyl alcohol being shipped for reclamation, and hazardous recyclable materials being shipped for precious metal recovery, and hazardous waste samples of more than 25 kilograms being shipped for waste characterization or treatability studies. Potentially affected industries may include, but are not limited to the following:

NAICS CODE	NAICS DESCRIPTION
211	Oil and Gas Extraction
324	Petroleum and Coal Products Manufacturing
325	Chemical Manufacturing
326	Plastics and Rubber Products Manufacturing
327	Nonmetallic Mineral Product Manufacturing
331	Primary Metal Manufacturing
332	Fabricated Metal Product Manufacturing
333	Machinery Manufacturing
334	Computer and Electronic Product Manufacturing
335	Electrical Equipment, Appliance, and Component Manufacturing
336	Transportation Equipment Manufacturing
339	Miscellaneous Manufacturing
423	Merchant Wholesalers, Durable Goods
424	Merchant Wholesalers, Nondurable Goods
522	Credit Intermediation and Related Activities
525	Funds, Trusts, and Other Financial Vehicles
531	Real Estate
541	Professional, Scientific, and Technical Services
561	Administrative and Support Services
562	Waste Management and Remediation Services
721	Accommodation
813	Religious, Grantmaking, Civic, Professional, and Similar Organizations
211	Oil and Gas Extraction
324	Petroleum and Coal Products Manufacturing

This list of potentially affected entities may not be exhaustive. The Agency's aim is to provide a guide for readers regarding those entities that potentially could be affected by this action. However, this action may affect other entities not listed in these tables.

4(b) Information Requested

This section describes the information collection requirements applicable to entities that will be affected by the Internet Posting and Confidentiality Determinations for Hazardous Waste Export and Import Documents Proposed Rule.

Confirmations of Receipt and Confirmations of Recovery or Disposal

(i) Data Items:

Confirmations of Receipt

Under the revised RCRA export and import regulations promulgated under the Revisions rule in 40 CFR Part 262, Subpart H, exporters and importers must ensure that the confirmation of receipt, an international movement document, accompanies all transnational shipments of hazardous waste. For shipments to and from Canada, exporters and importers may use the existing Canadian movement document they are already required to use under Canadian regulations to fulfill this requirement. Similarly, exporters to OECD countries and importers receiving waste from OECD countries for recycling (with the exception of Canada and Mexico) are already required to complete this document. It is required for U.S. receiving facilities to send confirmations of receipt to exporters and others countries by December 31, 2016.

Confirmation of Recovery or Disposal

Under the revised RCRA export and import regulations promulgated under the Revisions rule in 40 CFR Part 262, Subpart H, receiving facilities must provide a confirmation of recovery or disposal to the exporter and send copies to the competent authorities of the countries of export and import. The confirmation of recovery must be provided as soon as possible, but no later than 30 days after the completion of recovery and no later than one calendar year following receipt of waste. Importers receiving shipments from OECD countries are already subject to this requirement under existing U.S. regulations, and will therefore not experience a change in burden as a result of the rule. U.S. importers receiving shipments from Canada are already required to prepare and send a confirmation of recovery or disposal to the foreign exporter under Canadian regulations, and therefore will only incur costs to send copies of this document to EPA and Environment Canada.

In terms of recordkeeping requirements, exporters and importers must also maintain a copy of the confirmation of receipt and confirmation of recovery or disposal for three years. While exporters and importers handling waste with OECD countries other than Canada and Mexico are already subject to this requirement under existing regulations, exporters and

importers involved in the foreign trade of hazardous waste with Mexico, Canada, and non-OECD countries will experience an increase in cost burden as a result of the additional recordkeeping requirements.

Under the proposed Website rule, confirmations of receipt and confirmations of recovery or disposal must be posted to a publically available website until EPA's IT system is fully implemented at which point submissions must be sent electronically by the implementation of the complete IT system between 2018 and 2022.

(ii) Respondent Activities:

U.S. exporters and importers must post confirmations of receipt and confirmations of recovery or disposal to a publicly available website during the period between the implementation of the Revisions rule and the complete implementation of the electronic reporting system. The documents posted to the Export/Import Web site must be publicly accessible on the Web site by the first of March of each year and include all of the confirmations of receipt and confirmations of recovery or disposal received by the exporter or sent out by the receiving facility related to exports or imports of hazardous waste made during the previous calendar year. Each document must be available for a period of at least three years following the date on which each document was first posted to the Web site. The complete implementation of the electronic reporting system is anticipated between 2018 and 2022. U.S. exporters and importers must develop a publicly available website to post confirmations of receipt and confirmations of recovery or disposal if such a website is not available.

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

5(a) Agency Activities

Confirmations of Receipt and Confirmations of Recovery or Disposal

EPA may, if need arises, review a confirmation of recovery or disposal for hazardous waste shipments between the United States and Canada, Mexico, and non-OECD countries.

5(b) Collection Methodology and Management

The documents posted regarding the confirmation of receipt and confirmation of completed recovery or disposal of individual hazardous waste import and export shipments will be maintained and posted on publicly accessible websites by exporters of hazardous waste and receiving facilities of hazardous waste from foreign sources. The documents posted to the Export/Import Web site must be publicly accessible on the Web site by the first of March of each year and include all of the confirmations of receipt and confirmations of recovery or disposal received by the exporter or sent out by the receiving facility related to exports or imports of hazardous waste made during the previous calendar year. Each document must be available for a

period of at least three years following the date on which each document was first posted to the Web site. Furthermore, in accordance with current recordkeeping requirements, paper copies of export and import confirmations of receipt and confirmations of recovery or disposal must be retained by exporters and receiving facilities for a period of at least three (3) years.

5(c) Small Entity Flexibility

Some respondents will be small organizations. Small entities may also incur fewer costs because they can complete the recordkeeping and reporting requirements in less time than large organizations because they export or import smaller quantities of hazardous waste. However, the size of the organization does not always reflect the amount of time needed to complete documents, submit reports, or maintain records. EPA believes that the information to be collected is the minimum amount necessary to fulfill the purpose of the rule. Furthermore, the decision to export or import hazardous waste is voluntary. Thus, no business, small or otherwise, is required to export or import its hazardous waste. Therefore, there is no mandatory burden on the regulated community, including small businesses.

5(d) Collection Schedule

Under the proposed rule, the documents posted to the Export/Import Web site must be publicly accessible on the Web site by the first of March of each year and include all of the confirmations of receipt and confirmations of recovery or disposal received by the exporter or sent out by the receiving facility related to exports or imports of hazardous waste made during the previous calendar year.

6. ESTIMATING THE HOUR AND COST BURDEN OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA assessed the potential cost impacts of the rule, including:

- Reading and understanding the rule
- Posting the confirmations of receipt and confirmations of recovery or disposal to a publicly accessible website
- Developing a publicly accessible website to post the confirmations of receipt and confirmations of recovery or disposal if a publicly accessible website is not available

6(b) Estimating Respondent Costs

Labor Costs

For purposes of this analysis, this ICR estimates an average hourly respondent labor cost (including fringe benefits and overhead costs) of \$145.28 for managerial staff and \$71.19 for technical staff. These hourly labor costs were obtained from the following source:

- Hourly wage: Bureau of Labor Statistics, Occupational Earnings Data for May 2014.^{2,3}
- Wage inflation factor: Bureau of Labor Statistics, Employment Cost Index for 2014 and 2015.

Annual Capital and Operation & Maintenance (O&M) Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. O&M costs are those costs associated with paperwork requirements incurred continually over the life of the ICR. They are defined by the EPA as “the recurring dollar amount of costs associated with O&M or purchasing services.” The only costs associated with the proposed rule are labor costs; no capital or O&M costs will be incurred as a result of the rule.

6(c) Estimating Agency Burden and Costs

The burden and costs of this rule will be incurred by industry entities only. No Agency burden or costs are anticipated.

6(d) Estimating the Respondent Universe and Total Burden and Costs

In this section, EPA first describes the respondent universe affected by the new information collection requirements resulting from the final action. EPA then estimates the *annual aggregate burden* to respondents under the rule and existing RCRA information collection requirements. The universe estimates and assumptions used in the development of this ICR are based on the Regulatory Impact Analysis developed for this rulemaking: “Assessment of the Potential Costs, Benefits, and Other Impacts of the Internet Posting and Confidentiality Determinations for Hazardous Waste Export and Import Documents Proposed Rule” (hereinafter referred to as the Cost Assessment document for the rule), which is available in the docket for the rule.

(1) Respondent Universe

In Exhibits 1 and 2 below, EPA provides estimates of the annual number of importers and exporters (and export and import shipments) that will be subject to the information collection requirements in the rule.

² Mean hourly wages from May 2014 National Occupational Employment and Wage Estimates, Bureau of Labor Statistics accessed at http://www.bls.gov/oes/current/oes_nat.htm on March 10, 2014. Inflated to 2015 dollars using the US Bureau of Labor Statistics Employment cost index between 2014 and 2015

³ To estimate average annual labor costs, EPA relies on national average wage data reported by the U.S. Bureau of Labor Statistics for a full time employee working 40 hours a week multiplied by a loaded wage rate of 150 percent, which represents average private industry fringe benefits (e.g. paid time off, health benefits, retirement benefits, other legally required benefits, and payroll taxes) and overhead rates (e.g. general and administrative, fixed overhead, insurance, and profit).

Exhibit 1
Number of Importers and Shipments Potentially Affected by the Rule

Country of Origin ¹	Number of Affected Entities		Average Number of Shipments per Year ⁷
	U.S. Importers	U.S. Transporters ⁶	
Canada ^{2,3,4,5}	40	40	79
Mexico ^{2,3,5}	16	16	17
Non-OECD Countries	3	3	28
OECD Countries	2	2	37
Total	61	61	57

Notes:

1. Three importers received waste from two or more countries as described below. Therefore, there are 57 unique importers, rather than 61 listed above. However, this exhibit parses out the importers that receive from more than one country into each of their respective origins to accurately reflect the average number of shipments sent to each importer. Depending on the context, the remainder of this document may similarly parse out importers that receive from more than one country separately to accurately estimate costs associated with receiving from alternative destinations. That is, the analysis often uses the 61 count of importers and not the 57 unique importers.
2. While Canada and Mexico are OECD countries, under existing regulations there are different requirements for the foreign trade of hazardous waste with these countries compared with other OECD countries. Therefore, this EA estimates impacts to importers (and exporters) separately for trade with Canada and Mexico versus other OECD countries.
3. A single importer received shipments from Canada, Mexico, and Germany
4. A single importer received shipments from Canada and Syria (non-OECD)
5. A single importer received shipments from Mexico, Japan (OECD), Malaysia (non-OECD), and the Philippines (non-OECD)
6. This analysis assumes one transporter per shipment.
7. Source: U.S. EPA RCRA manifests for import shipments, 2014.

Exhibit 2
Number of Exporters and Shipments Potentially Affected by the Rule

Destination Country ¹	Number of Affected Entities		Average Number of Shipments per Year ⁶
	U.S. Exporters	U.S. Transporters	
Canada ^{2,3,4,5}	348	348	68
Mexico ^{2,3}	21	21	1,146
Non-OECD Countries	0	0	0
OECD Countries ^{3,5}	34	34	58
Total	403	403	126

Notes:

1. Eight exporters shipped waste to two countries. Therefore, there are 395 unique exporters, rather than 403 listed above. However, this exhibit parses out the exporters that ship to more than one country group (Mexico, Canada, OECD, Non-OECD) into each of their respective destinations to accurately reflect the average number of shipments sent to each destination. Depending on the context, the remainder of this document may similarly parse out exporters that ship to more than one country separately to accurately estimate costs associated with shipping to alternative destinations. In other words, this analysis sometimes uses the 403 count of exporters and not the 395 unique exporters where appropriate.
2. While Canada and Mexico are OECD countries, under existing regulations there are different requirements for the foreign trade of hazardous waste with these countries compared with other OECD countries. Therefore, this EA estimates impacts to exporters (and importers) separately for trade with Canada and Mexico versus other OECD countries.
3. Four exporters sent shipments to both Canada and Korea
4. Two exporters sent shipments to Canada and Mexico
5. Two exporters sent shipments to Canada and Germany
6. This analysis assumes one transporter per shipment.
7. Source: U.S. EPA Export Annual Reports, 2014.

(2) Annual Respondent Hour and Cost Burden under the Rule

Annual respondent hour and cost burden estimates are summarized below and itemized in the exhibits at the end of this document.

(a) Reading the Regulations

EPA expects that all 395 exporters and 57 importers will need to familiarize themselves with the requirements of the rule.⁴ EPA assumes that reading and understanding the rule will require 0.5 hours of a manager's time and 0.5 hours of a technician's time.⁵ This is equivalent to an upfront cost of \$108.24 per facility.

4 For reporting purposes, EPA estimates that if an exporter ships waste to both Canada and Mexico, half of the costs are incurred for shipments to Canada and half are incurred for shipments to Mexico. Therefore, costs are proportionally distributed (by country) for entities that trade with more than one country.

5 Page B-1 of the Cost Assessment for the Proposed Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

(b) Confirmations of Receipt and Confirmations of Recovery or Disposal

Under the Revisions rule, U.S. receiving facilities must prepare and maintain confirmations of receipt and confirmations of recovery or disposal, and send such documents to the exporter, and the relevant authority in the country of origin for each shipment received. Under this proposed rule, EPA estimates that all exporters and importers of hazardous waste will incur costs to post confirmations of receipts and recovery to publicly available websites, until the complete implementation of the electronic system between 2018 and 2022. EPA estimates that uploading a confirmation of receipt and recovery to a publicly available website and then reviewing to confirm the documents have been placed correctly on the website will require five minutes (0.08 hours) of a technician's time per shipment, yielding an estimated cost burden of \$5.69 per shipment.

(c) Website Development

Exporters and importers must develop a publicly accessible website to post the confirmations of receipt and confirmations of recovery or disposal if a publicly available website is not available. EPA reviewed the 2014 hazardous waste treatment, disposal and storage (TSDF) corporate owners to evaluate which corporate owners have websites available. This review determined that 16.2 percent of exporters do not have a publicly accessible website and 28.9 percent of importers do not have a publicly accessible website. EPA therefore assigns the costs of building a website to these 16.2 percent of exporters and 28.9 percent of importers.

EPA incorporates the estimated costs of creating a website specifically for the purposes of compliance reporting from EPA's 2016 Disposal of Coal Combustion Residuals from Electric Utilities (CCR) final rule. The Agency assumes 2 hours of managerial time and 10 hours of technician time to develop a website, and assumes costs will only be incurred during the first year of the proposed rule.⁶ This is equivalent to an upfront cost of \$1,002.43 per facility (or \$228 on an annualized basis over a 5 year time horizon, using a seven percent discount rate).

6(e) Bottom Line Burden Hours and Costs

(1) Respondent Tally

Exhibit 6 reports the number of respondents that must comply with information collection activities under the rule. Exhibit 7 reports the total annual respondent burden and costs associated with the aforementioned new information collection activities. The exhibit shows that the total annual respondent burden under the rule during the first year of its implementation, including the cost of reading the rule, is estimated to be 4,815 hours and \$435,692. In each subsequent year, the respondent burden is estimated to be 4,270 hours and \$303,968. For the affected hazardous waste exporting and importing entities, the average number of responses per affected entity is estimated to be 7.4 on average in the first two years of the rule. Finally, Exhibit 8 reports the average annual private industry cost estimates for the first three years of the rule.

(2) Agency Tally

⁶ Supporting Statement for EPA Information Collection Request Number 1189.25 "Disposal of Coal Combustion Residuals From Electric Utilities (Final Rule)."

The burden and costs of this rule will be incurred by industry entities only. No Agency burden or costs are anticipated.

6(f) Reasons for Change in Burden

As aforementioned, the new information collection requirements under the rule are necessary to enable electronic submittal of export and import-related documents.

6(g) Burden Statement

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

Exhibit 3
Reading the Rule
(In the first year of Rule Implementation Only)

Information Collection Activity	Hours and Costs Per Entity							Total Hours and Costs ³		
	Managerial (\$145.28/hr)	Technical (\$71.19/hr)	Clerical (\$38.21/hr)	Total Hours	Labor Cost	O&M Cost	Total Cost ¹	Number of Respondents ²	Total Hours	Total Cost
U.S. Exporters										
Reading the rule	0.5	0.5	0	1	\$108.24	\$0.00	\$108.24	394	394	\$42,590.51
U.S. Importers										
Reading the rule	0.5	0.5	0	1	\$108.24	\$0.00	\$108.24	56	56	\$6,007.05
TOTAL - YEAR 1								449	449	\$48,597.56

Sources:

(1) Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

(2) Unique entity counts are based on U.S. EPA Export and Import Annual Reports, 2014.

(3) Totals may not sum due to rounding.

Exhibit 4
Posting Confirmation of Receipts and Recovery

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs ²			
	Managerial (\$145.28/hr)	Technical (\$71.19/hr)	Clerical (\$38.21/hr)	Total Hours	Labor Cost ¹	O&M Cost	Total Cost	Number of Resp.	Number of Shipments	Total Hours	Total Cost
U.S. Exporters - Canada											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	348	23,722	1,898	\$135,093.16
U.S. Exporters - Mexico											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	21	24,069	1,926	\$137,069.27
U.S. Exporters - non-OECD											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	0	0	0	\$0.00
U.S. Exporters - OECD											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	34	1,986	159	\$11,309.97
U.S. Importers - Canada											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	40	3,176	254	\$18,086.83
U.S. Importers - Mexico											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	16	265	21	\$1,509.13
U.S. Importers - non-OECD											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	3	84	7	\$478.37

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs ²			
	Managerial (\$145.28/hr)	Technical (\$71.19/hr)	Clerical (\$38.21/hr)	Total Hours	Labor Cost ¹	O&M Cost	Total Cost	Number of Resp.	Number of Shipments	Total Hours	Total Cost
publicly accessible website.											
U.S. Importers - OECD											
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	0	0.08	0	0.08	\$5.69	\$0.00	\$5.69	2	74	6	\$421.42
TOTAL								430	51,390	4,270	\$303,968.14

Source:

(1) Burden estimates based on Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009.

(2) Totals may not sum due to rounding.

**Exhibit 5
Website Development**

Information Collection Activity	Hours and Costs Per Shipment							Total Hours and Costs ³		
	Managerial (\$145.28/hr)	Technical (\$71.19/hr)	Clerical (\$38.21/hr)	Total Hours	Labor Cost ¹	O&M Cost ²	Total Cost	Number of Entities	Total Hours	Total Cost
U.S. Exporters - Canada										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	56	12	\$56,547.60
U.S. Exporters - Mexico										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	3	12	\$3,412.36
U.S. Exporters - non-OECD										
Upload and then review confirmation of receipts/recovery to confirm documents has been placed on importer/exporter publicly accessible website.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	0	12	\$0.00
U.S. Exporters - OECD										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	6	12	\$5,524.77
U.S. Importers - Canada										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	12	12	\$11,567.98
U.S. Importers - Mexico										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	5	12	\$4,627.19
U.S. Importers - non-OECD										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	1	12	\$867.60
U.S. Importers - OECD										
Develop publicly accessible internet site for posting confirmation of receipts/recovery.	2	10	0	12	\$1,002.43	\$0.00	\$1,002.43	1	12	\$578.40
TOTAL								83	96	\$83,125.90

Source:

(1) Burden estimates based on Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation: Office of Resource Conservation and Recovery, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, May 2009, updated for wages and materials costs.

(2) 2014 TSDf Company website review

(3) Totals may not sum due to rounding.

Exhibit 6
Estimated Number of Respondents Affected by the Hazardous Waste Export-Import Rule

Information Collection Activity	Number of Respondents									
	U.S. Exporters (Canada)	U.S. Exporters (Mexico)	U.S. Exporters (non-OECD)	U.S. Exporters (OECD)	U.S. Exporters (Other)	U.S. Importers (Canada)	U.S. Importers (Mexico)	U.S. Importers (non-OECD)	U.S. Importers (OECD)	TOTAL
Reading the Rule	348	21	0	34	0	40	16	3	2	464
Posting Confirmation of Recovery or Disposal	348	21	0	34	0	40	16	3	2	464
Website Development	56	3	0	6	12	12	5	1	1	85
TOTAL	348	21	0	34	12	40	16	3	2	476

Exhibit 7
Total Annual Estimated Respondent Burden by Rule Provision

Provision	Total Hours	Total Costs^{1,2}	Total Cost Savings^{1,2}	Net Costs^{1,2}
Reading the Rule - Year 1	449	\$48,597.56	\$0	\$48,597.56
Posting Confirmation of Recovery or Disposal - Year 1	4,270	\$303,968.14	\$0	\$303,968.14
Posting Confirmation of Recovery or Disposal - After Year 1	4,270	\$303,968.14	\$0	\$303,968.14
Website Development - Year 1	96	\$83,125.90	\$0	\$83,125.90
Total - Year 1	4,815	\$435,691.59	\$0	\$435,691.59
Total – Year 2 and beyond	4,270	\$303,968.14	\$0	\$303,968.14

Notes:

- (1) Assumes electronic system implementation in 2018.
- (2) Totals may not sum due to rounding.

Exhibit 8
Average Respondent Burden and Cost Estimates for the First Three Years

Respondent Type	Total Respondents	Total Responses	Number of Responses per Respondent	Total Hours	Total Labor Costs	Total Capital/Startup and O&M Costs	Total Cost
Private Industry	476	3,525	7.4	4,452	\$347,876	\$0	\$347,876
Agency ¹	N/A	N/A	N/A	0	0	0	0
State and Local Authorities ¹	N/A	N/A	N/A	0	0	0	0

Notes:

1. Agency and State and Local Authorities will not incur costs as a result of the rule.