SF-83 SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS

1. Identification of the Information Collection

1(a) Title of the Information Collection

RCRA Subpart CC - Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers

1(b) Short Characterization/Abstract

This information collection request is to allow the Agency to continue requiring regulated companies to collect and report necessary information in order to determine that such affected companies are complying with RCRA Subpart CC.

The air emission standards for tanks, surface impoundments and containers at 40 CFR Part 264, Subpart CC and 40 CFR Part 265, Subpart CC were proposed on July 22, 1991(56 FR 33491), and promulgated on December 1994 (59 FR 62896). Amendments to this Subpart were added on November 25 1996 (61 FR 59931). The requirements of this Subpart apply to owners and operators of all facilities that treat, store or dispose (TSD) of hazardous wastes in tanks, surface impoundments and containers that are subject to Subparts I, J or K of these Parts except for §§264.1, 265.1 and those management units identified at §§264.1080(b) and 265.1080(b). Also, the requirements of this Subpart apply to large quantity generators that manage hazardous wastes in either tanks or containers; (262.34(a)(1)(i and ii).

The potential number of respondents subject to these regulations is 6,497 respondents over the next three years. On an annualized basis, the number of respondents subject to this requirement is 6,318. This number was derived from 20,316 large quantity generators (LQGs) and 2,025 treatment, storage and disposal facilities (TSDFs), obtained from the latest RCRA Hazardous Waste Biennial Report (1997). However, not all of these respondents will be subject to the Subpart CC regulations. It is estimated 70% of the 2,025 TSDFs and 25% of the 20,316 large quantity generators or 6,497 facilities will be subject to Subpart CC requirements. This is a increase of 269 respondents from the last information collection request. The total number of respondents is based on information obtained from

the Agency's 1997 Biennial Report, the most recent data available.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

Organic air emissions from hazardous waste TSDFs can contain toxic chemical compounds. Cancer and other adverse noncancerous human health effects can result from exposure to these emissions. Also, organic emissions from TSDFs react photochemically with other compounds in the atmosphere to form ozone. Excessive ambient ozone concentrations are a major air quality problem in many cities throughout the United States. Nationwide organic emissions from TSDFs are estimated to be approximately 1 million megagrams per year. These organic emissions are estimated to result in 48 excess incidences of cancer per year nationwide and a 3 x 10-2 maximum individual risk (MAR).

In 1984, Congress passed the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) of 1976. Section 3004(n) of HSWA directs the EPA to promulgate regulations for the monitoring and control of air emissions from TSDFs as may be necessary to protect human health and the environment. Recommended standards have been developed by the EPA under the authority of Sections 3002 and 3004 of RCRA to reduce organic air emissions from certain TSDF tanks, surface impoundments, and containers; and certain hazardous waste generator accumulation tanks.

The experience of the EPA in implementing and enforcing New Source Performance Standards (NSPS) and National Emission Standards tor Hazardous Air Pollutants (NESHAP) promulgated under authority of the Clean Air Act has demonstrated that certain information must be collected to ensure compliance with air emission standards. Information collection is needed by the EPA tor this rulemaking to determine: (a) whether a hazardous waste contains sufficiently low concentrations of volatile organics to allow the waste to be managed in a tank, surface impoundment, or container without the use of emission controls, and (b) for units requiring emission controls, whether the controls are being properly operated and maintained.

2(b) Practical Utility/Users of the Data

The collected information will be used by the EPA enforcement personnel to ensure that the

requirements of the recommended rules are being properly applied and that emission control devices are being properly operated and maintained on a continuous basis.

In addition, records and reports are necessary to enable the EPA to identify TSDF owners or operators that may not be operating in compliance with the standards. The reported information is used by the EPA to target TSDFs for inspection and identify what records or waste management units should be inspected at the TSDF. The information that TSDF owners or operators are required to maintain is recorded in sufficient detail to enable owners or operators to demonstrate their means of complying with the applicable standards. The data collected by the affected facility is retained at the facility for a minimum of three years.

In addition, the information collected from the recordkeeping and reporting requirements is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR Part 264.1089, 264.1090 and 265.1090.

3(a) Nonduplication

Since Subpart CC is a recent rule, most States have not been authorized to implement this program until such time their state hazardous waste program is consistent with the federal program regarding this particular activity. Until that time, States cannot implement this particular activity under their RCRA program. Therefore, there is no duplication of effort by State agencies. If States become authorized during this next ICR cycle, the reports or notifications would be submitted to the State program office and not to the EPA.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on August 17, 2000. (65 FR 50196)

3(c) Consultations

No comments were received on the burden published in the Federal Register.

3(d) Effects of Less Frequent Collection

If the information required by the standard was not collected, the Agency would have no means for ensuring that compliance with RCRA Subpart CC is achieved and maintained by large quantity generators and treatment, storage or disposal facilities. Under these circumstances, an owner or operator could elect to reduce operating expenses by not installing, maintaining, or otherwise operating, the cover, roof or control technology required by the standards. In the absence of the information collection requirements, compliance with the standards could be ensured only through continuous on-site inspections by regulatory agency personnel. Consequently, not collecting the information would result in either greatly increased expenditures of resources, or the inability to ensure compliance with the standards.

Respondents are required to submit reports only when circumstances occur at the facility that result in improper management of hazardous waste in units not using the required air emission controls and when a control device malfunction cannot be corrected within 24 hours of being detected. There are no reporting requirements for owners and operators of interim-status TSDFs (subject to the requirements of 40 CFR part 264). Owners and operators of permitted TSDFs (subject to the requirements of 40 CPR part 265) must report within 15 calendar days circumstances resulting in the management of hazardous waste subject to the rules in a tank, surface impoundment, or container not using the required air emission controls. In addition, an owner or operator of a permitted TSDF that uses a control device to comply with the requirements of the rules must submit a semiannual written report of any exceedances, as defined in the rules, that may occur. If no exceedances have occurred during the reporting period, no report is required.

The recommended rules require the TSDF owner or operator to record certain information to the on-site facility operating logs or files. Consistent with 40 CFR 264.73 and 40 CFR 265.73, the rules require that air emission control equipment design records and certain other records be maintained in the facility operating record until facility closure. Records and results of waste determinations, inspections, monitoring, control device exceedances and actions taken to remedy them, leak repairs, and management of carbon removed from carbon adsorption systems are required to be kept for at least 3 years from the date of entry.

All reports are to be submitted to the EPA Regional office having jurisdiction for a particular

TSDF location. The reports must be signed and dated by an authorized representative of the facility owner or operator. The information is needed by the EPA to identify facilities where the owners or operators are having difficulty complying with the requirements of the rules.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB in 5 CFR §1320.6.

3(f) Confidentiality

The required information consists of emissions data and other information that have been determined not to be private. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are:

Regulation	SIC Codes	NAICS Codes
RCRA Subpart CC - Standards of Performance for Air Emission Standards for Tanks, Surface Impoundments and Containers	20 thru 39 and 33-37	281,282, 283, 284, 285, 286, 287

4(b) INFORMATION REQUESTED

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR Part 264 and Part 265, RCRA Subpart CC - Air Emission Standards for Tanks, surface Impoundments and Containers.

A source must make the following reports:

Reports for RCRA Subpart CC		
Affected Waste Management Unit	Substantive Requirement	Reporting Requirements
Unit managing hazardous waste containing less than 500ppmw, mass-weighted average, volatile organics at point of waste generation.	Waste volatile organic concentration determination at point of generation. 264.1083(c)(1) 265.1084(c)(1)	Report waste determination results exceeding 500ppmw volatile organics on a mass-weighted average basis. 264.1090(a)
Affected Waste Management Unit	Substantive Requirement	Reporting Requirement
Unit managing hazardous waste treated in accordance with one of the organic destruction or removal processes.	Waste volatile organic concentration determination at point of generation of waste origination. 264.1083(a)(2) 265.1084(a) Treatment process exit concentration limit determination. 264.1083(b) Treatment process required mass removal of organics determination. 264.1083 (b) Treatment process or organic mass removal and actual mass removal of organics determination. 264.1083(b)	Report waste determination results indicating that the process used to treat the waste fails to meet the applicable conditions specified in the rule. 264.1090(a)
Tank using cover only.	Maximum organic vapor pressure of hazardous waste in a tank determination. 264.1083(c) 265.1084(c)	Report waste
Tank using alternative controls: internal or external floating roofs.	Annual visual inspection of floating roof. 264.1091(b0 265.109(b)	Report date of inspection 30 days in advance. 264.1091(b) 265.1091(b)

	Monitoring of external floating roof seals at least every five years. 264.1091(b) 265.1091(b)	Report date of monitoring results 30 days in advance. 264.1091(b) 265.1091(b)
Surface impoundment using cover closed vent system and control device.	Continuous monitoring of control device operating parameter. 264.1088(d) 265.1089(d)	Report monitoring results exceeding the values specified in standards if control device malfunction is not corrected within 24 hours. 264.1090(c)
Container used for waste-fixating, heat generating or heat using treatment process.	Continuous monitoring of control device operating parameter. 264.1088(d) 265.1089(d)	Report monitoring results exceeding the values specified in standards if control device malfunction is not corrected within 24 hours. 264.1090(c)

A source must keep the following records.

Recordkeeping for RCRA Subpart CC		
Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirements
Unit managing hazardous waste containing less than 500ppmw, mass-weighted average, volatile organics at point of waste generation.	Waste volatile organic concentration determination at point of generation. 264.1083(c)(1) 265.1084(c)(1)	Record waste determination results. 264.1089(c) 265.1090(c)

Unit managing hazardous waste treated in accordance with one of the organic destruction or removal processes.	Waste volatile organic concentration determination at point of generation of waste origination. 264.1083(a)(2) 265.1084(a) Treatment process exit concentration limit determination. 264.1083(b) Treatment process required mass removal of organics determination. 264.1083 (b) Treatment process or organic mass removal and actual mass removal of organics determination. 264.1083(b)	Record waste determination results 264.1089(c) 265.1090(c)
	Treatment by incinerator in compliance with 40 CFR 264 Subpart O or in compliance with 40 CFR Part 265 Subpart H and Part 270. 264.1082(c)(2)(vi)	Record identification number of incinerator or BIF. 264.1089(e)

Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirements

Tank using cover with closed vent system with control device.	Design control system to meet specified performance level and equipment specifications. 264.1084(b) and 264.1088(c) 265.1085(b) and 265.1088 (b) and (c)	Record closed vent system and control device design specifications and, if used, performance test results. 264.1089(a)(4) 265.1090(a)(4) Maintain records in operating record for a minimum of three years, and all records pertaining to the operations of the air emission control equipment for as long as it is in service. 264.1089(g)
	Continuous monitoring or control device operating parameter. 264.1088(d) 265.1089(d)	Record monitoring results 264.1089(a)(9) 265.1090(a)(9)
	Semiannual visual inspection of cover. 264.1088(b) 265.1089(f)(2)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Semiannual Method 21 monitoring of cover fittings. 264.1088(b0 265.1089.(f)(2)	Record closed vent system and control device design specifications and, if used, performance test results. 264.1089(a)(4) 265.1090(a)(4)
	Annual visual inspection of closed vent system and control device. 264.1088(c) and (d) 265.1089(c) and (d)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Annual Method 21 monitoring of closed vent system. 264.1088(c) 265.1089(f)(7)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7)
	Repair leaks detected by inspection or monitoring 264.1088(c) 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)

Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirements

	Manage carbon removed from carbon adsorption system. 264.1087(c)(3)(i) 264.1088(c)(3)(i)	Record carbon management methods. 264.1089(a)(10) 265.1090(a)(10)
	Inspection and monitoring of unsafe to inspect and monitor covers. 264.1088(b) 265.1089(f)(2)(ii)	Record inspection and monitoring plan and explanation of why cover unsafe to inspect and monitor. 264.1089(f)(1) 265.1090(f)(1)
	Inspection and monitoring of difficult to inspection and monitor covers. 264.1088(b) 265.1089(f)(2)(iii)	Record inspection and monitoring schedule and explanation of why cover difficult to inspect and monitor. 264.1089(f)(2) 265.1090(f)(2)
Tank using cover only.	Maximum organic vapor pressure of hazardous waste in a tank determination. 264.1083(c) 265.1084(c)	Record waste determination results. 264.1089(b)(2) 265.1090(b)(2) Alternative compliance for tanks with covers. 264.1089(b) 265.1090(b)
	Semiannual visual inspection of cover. 264.1088(b) 265.1089(f)(2)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Annual Method 21 monitoring of cover fittings. 264.1088(b) 265.1089(f)	Record monitoring results 264.1089(a)(7) 265.1090(a)(7)
	Repair leaks detected by inspection or monitoring. 264.1088(c) 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)
	Inspection and monitoring of unsafe to inspect and monitor covers. 264.1088(b) 265.1089(f)(5)	Record inspection and monitoring plan and explanation of why cover unsafe to inspect and monitor. 264.1089(f)(1) 265.1090(f)(1)

Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirement

	Inspection and monitoring of difficult to inspect and monitor covers. 264.1088(b) 265.1089.(f)(6)	Record inspection and monitoring schedule and explanation of why cover difficult to inspect and monitor. 264.1089(f)(2) 265.1090(f)(2)
Tank using alternative controls: internal or external floating roofs.	Design floating roof to meet equipment specifications. 264.1091(a) 265.1091(a)	Record floating roof design specifications. 264.1089(a)(1) 265.1090(a)(1)
	Annual visual inspection of floating roof. 264.1091(b0 265.109(b)	Record inspection results. 264.1091(c) 265.1091(c)
	Monitoring of external floating roof seals at least every five years. 264.1091(b) 265.1091(b)	Record monitoring results. 264.1091(c)
Surface impoundment using cover closed vent system and control device.	Design control system to meet specified performance level and equipment specifications. 264.1085(b) and 264.1087(c) 265.1086(b) and 265.1088(c)	Record closed vent system and control device design specifications and, if used, performance test results. 264.1089(a)(4) 265.1090(a)(4)
	Continuous monitoring of control device operating parameter. 264.1088(d) 265.1089(d)	Record monitoring results. 264.1089(a)(9) 265.1090(a)(9)
	Semiannual visual inspection of cover. 264.1088(b0 265.1089(f)(2)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Semiannual Method 21 monitoring of cover fittings. 264.1088(b) 265.1089(f)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7(
	Annual visual inspection of closed vent system and control device. 264.1088(c) and (d) 265.1089(c) and (d)	Record inspection results. 264.1089(a)(7) 265.1090(a)(7)

Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirement

	Annual Method 21 monitoring of closed vent system 264.1088(c) 265.1089(c)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7)
	Repair leaks detected by inspection or monitoring. 264.1088(f)(7) 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)
	Manage carbon removed from carbon adsorption system. 264.1087(c)(3)(i) 265.1088(c)(3)(i)	Record carbon management methods. 264.1089(a)(10) 265.1099(a)(10)
Surface Impoundment using cover only.	Design cover to meet equipment specifications. 264.1085(e) 265.1086(e)	Record cover design specifications. 264.1089.(a)(2) 265.1090(a)(2)
	Semiannual visual inspection of cover. 264.1088(h) 265.1089(f)(4)	Record inspection results. 264.1089.(a)(6) 265.1090(a)(6)
	Semiannual Method 21 monitoring of cover fittings. 264.1088(b) 265.1089(f)(4)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7)
	Repair leaks detected by inspection or monitoring. 264.1088(c0 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)
	Manage carbon removed from carbon adsorption system. 264.1087(c)(3)(i) 265.1088(c)(3)(i)	Record carbon management methods. 264.1089(a)(10) 265.1090(a)(10)
Container with design capacity greater than or equal to 0.1 m^3 (26.4 gallons) used for waste handling, preparation or storage.	Semiannual visual inspection of cover. 264.1088(b)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Semiannual Method 21monitoring of cover fittings on containers having a design capacity greater than or equal to 0.42 m^3 (110 gallons). 264.1088(f)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7)
	Repair leaks detected by inspection or monitoring. 264.1088(c)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)

Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirement

Container used for waste-fixating, heat generating or heat using treatment process.	Design control system to meet specified performance level and equipment specifications. 264.1086(b)(20 and 264.1087(c) 265.1087(b)(2) and 265.1088.(c)	Record control system design specifications and, if used, performance test results. 264.1089(a)(3)and (4) 265.1090(a)(3) and (4)
	Continuous monitoring of control device operating parameter. 264.1088(d) 265.1089(d)	Record monitoring results. 264.1089(a)(9) 265.1090(a)(9)
	Semiannual visual inspection of cover. 264.1088(h) 265.1089(f)	Record inspection results. 264.1089(a)(6) 265.1090(a)(6)
	Semiannual Method 21monitoring of cover fittings. 264.1088(b) 265.1089(f)	Record monitoring results. 264.1089(a)(7) 265.1090(a)(7)
	Annual visual inspection of closed vent system and control device. 264.1088(c) and (d) 265.1089(c) and (d)	Record repair results. 264.1089(a)(6) 265.1090(a)(6)
	Annual Method 21 monitoring of closed vent system. 264.1088(c) 265.1089(f)(3)(i)	Record monitoring results. 264.1089(a)(7) 265.1090(7)
	Repair leaks detected by inspection or monitoring 264.1088(c) 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)
	Annual visual inspection of closed vent system and control device. 264.1088(c) and (d) 265.1089(c) and (d)	Record repair results. 264.1089(a)(6) 265.1090(a)(6)
	Annual Method 21 monitoring of closed vent system. 264.1088(c) 265.1089(f)(3)(i)	Record monitoring results. 264.1089(a)(7) 265.1090(7)
	Repair leaks detected by inspection or monitoring 264.1088(c) 265.1089(f)(7)	Record repair results. 264.1089(a)(8) 265.1090(a)(8)
	Manage carbon removed from carbon adsorption system. 264.1087(c)(3)(i) 265.1088(c)(3)(i)	Record carbon management methods. 264.1089(a0(10) 265.1090(a)(10)
Affected Waste Management Unit	Substantive Requirement	Recordkeeping Requirement

Container with a design capacity less than or equal to .46m^3 equipped with a cover and complies with all applicable DOT regulations.	Annual testing method of transportation containers by Method 27. 264.1086(b)(1)(iii) 265.1087(b)(1)(iii)	Record Method 27 test. 264.1089(a)(5) 265.1090(a)(5)

ii. Respondent Activities

Respondent Activities
Read instructions.
Sample waste streams and make waste determinations at the point of generation.
Install, calibrate, maintain, and operate floating roof or vapor recovery system.
Take gap measurements, inspect primary and secondary roofs.
Write the notifications and reports listed above - 4(b)(i) Reports
Enter information required to be recorded above - 4(b)(i) Recordkeeping
Inspect and monitor difficult and/or unsafe tank roofs.
Monitor and inspect cover fittings, roofing systems, closed vent systems.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information
Develop, acquire, install, and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Review notifications and reports required to be submitted by industry.
Inspect the facility for compliance including records and reports.
Input, analyze, and maintain data in the Resource Conservation and Recovery database known as RCRIS.

5(b) Collection Methodology and Management

The recommended standards are applicable to TSDF subject to the existing RCRA Subtitle C permitting requirements. The standards require organic emission control equipment to be used on permitted and interim-status TSDF tanks, surface impoundments and containers that manage hazardous waste with an average volatile organic concentration at the point of waste generation greater than or equal to 500 parts per million by weight (ppmw) on a mass-weighted average basis. In addition, the recommended standards are applicable to hazardous waste generators accumulating hazardous wastes in tanks and containers pursuant to conditions specified in 40 CFR Part 262.34 (a). These units are exempt from RCRA Subtitle C permitting requirements provided the waste generator accumulates waste In the unit for no more than 90 days and complies with the control requirements specified in 40 CFR Part 265, Subparts I and J.

The standards are not applicable to certain waste management units. For example, the requirements of the Subpart CC standards do not apply to; a tank or surface impoundment in which an owner or operator stops adding hazardous waste and begins undergoing closure or which is closed in accordance with existing RCRA regulations; a container that has a design capacity less than 0.1 m3 (26.4 gallons); or a tank, surface impoundment or container that contains hazardous waste prior to the rule's effective date if no new hazardous waste is added to the unit on or after the effective date.

Each owner or operator of an affected tank, surface impoundment or container is required by the recommended standards to comply with the requirements summarized below.

i. Standards for Tanks. The owner or operator of a tank used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw at the point of waste generation is required to install and use emission control equipment. The control equipment requirements are to install, operate, and maintain either a cover connected through a closed-vent system to a control device, an external floating roof, a fixed roof with an internal floating cover, or a pressure tank that operates with no detectable organic emissions. An owner or operator is allowed to use a cover without a closed-vent system and control device on a tank that satisfies all of the following conditions: (1) the hazardous waste managed in the tank is not mixed, stirred, agitated, or circulated within the tank by the owner or operator using a process that results in splashing, frothing, or visible turbulent flow on the waste surface during normal process operations; (2) no waste fixating, heat-using (except the minimum heating required to prevent waste freezing or to maintain adequate waste flow conditions for continuing normal process operations during cold weather), or heat generating process is conducted In the tank; and (3) either the tank capacity is less than 75 m3 (20,000 gallons) and the maximum organic vapor pressure

is less than 76.6 kPa (11.1 psi), the tank capacity is less than 151 m3 (40,000 gallons) and the maximum organic vapor pressure is less than 27.6 kPa (4.0 psi), or the capacity of the tank is equal to or greater than 151 m3 and the maximum organic vapor pressure is lese then 5.2 kPa (0.75 psi).

ii. Standards for Surface Impoundments. The owner or operator of a surface impoundment used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw at the point of waste generation is required to install and use emission control equipment. The control equipment requirement is to install, operate and maintain either a cover or enclosure connected through a closed-vent system to a control device. An owner or operator is allowed to use a contact cover (e.g., floating membrane cover) without a closed-vent system and control device on a surface impoundment that satisfies all of the following conditions: (1) the hazardous waste managed in the surface impoundment is not mixed, stirred, agitated, or circulated within the surface impoundment by the owner or operator using a process that results in splashing, frothing, or visible turbulent flow on the waste surface during normal process operations; and (2) no waste fixating, heat-treating or heat-generating process is conducted in the surface impoundment.

iii. Standards for Containers. The owner or operator of a container used to manage hazardous waste with a mass-weighted average volatile organic content greater than or equal to 500 ppmw is required to use the following procedures. The owner or operator. must place the hazardous waste either into a container equipped with a cover that operates with no detectable organic emissions when all openings are secured in a closed, sealed position; or a container having a design capacity less than or equal to 0.42 m3 (110 gallons) that complies with all applicable Department of Transportation regulations for packaging hazardous waste for transport under 49 CFR Part 178; or a container that is attached to or forms a part of any truck, trailer, or railcar and has been tested for organic vapor tightness within tho preceding 12 months in accordance with EPA Method 27. A container is required to be covered except when waste is being added, removed, inspected, or sampled or the container is vented in accordance with good engineering and safety practices for handling flammable, combustible, explosive, or other hazardous materials. A loading operation conducted by pumping into a container having a design capacity greater than or equal to 0.42 m3 (approximately 110 gallons) must be performed using a conveyance system that uses a tube (e.g., pipe or hose) to add waste into the container below the waste surface or within 15.2 cm (6 inches) of the bottom of the container. A container used tor waste fixation is required (during the fixation process) to be located in an enclosure with a closed-vent system that is operating with sufficient airflow to capture and route all organic vapors vented from the container to a

control device. The enclosure may have permanent or temporary openings but must be maintained at a pressure below atmospheric pressure such that whenever an open container is placed inside the enclosure no organic vapors released from the container exit through the openings.

iv. Standards for Closed-Vent Systems and Control Devices. The requirements under the recommended Subpart CC standards for an individual closed-vent system with control device are identical to those already applicable to TSDF owners and operators under Subpart AA in 40 CFR Parts 264 and 265. The Subpart AA standards were promulgated in June of 1990 and require TSDF owners and operators to use closed-vent systems and control devices to control organic air emissions from process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, and air or steam stripping operations at a TSDF.

v. Waste Determinations. If an owner or operator chooses to determine if a particular tank, surface impoundment, or container is not subject to specific control requirements on the basis of the volatile organic concentration at the point of waste generation or organic vapor pressure of the hazardous waste being managed in the unit, the owner or operator is required to perform periodic waste determinations. Either direct measurement or knowledge of the waste is used to determine that a waste contains a mass-weighted average concentration at the point of waste generation of less than 500 ppmw volatile organics or is below the organic vapor pressure limit.

Direct measurement of the waste volatile organic concentration or organic liquid vapor pressure is performed using EPA reference test methods. Knowledge constitutes documentation that conclusively shows that the waste volatile organic concentration or organic vapor pressure is below the specified limit under all conditions. For example, a company that generates a hazardous waste as a result of manufacturing a product could provide the EPA with evidence that no volatile organic chemicals are used in the manufacturing process.

The waste determination for a waste generated as a continuous flow needs to be performed initially before the first time any portion of the hazardous waste is placed in a unit subject to the final standards and repeated at least annually. In addition, the owner or operator is required to perform a new waste determination whenever changes to the process generating or treating the hazardous waste could potentially cause the average volatile organic concentration to increase to or above 500 ppmw or cause the treatment process performance to decline below the minimum efficiency requirements specified in the rule. For a hazardous waste that is generated as a discrete quantity of material from a batch process, sequenced or intermittent operation, or non-continuous source, the waste determination must be

performed for each discrete quantity of hazardous waste generated before the waste is placed in a waste management unit not controlled for organic emissions.

vi. Monitoring and Inspection Requirements. To ensure that emission control equipment is properly operated and maintained, the recommended standards require the owner or operator to include certain emission control equipment items as part of the inspections the owner or operator is already conducting to comply with existing RCRA standards (e.g., 40 CFR 264.195 for tanks, 40 CFR 264.254 for surface impoundments, 40 CFR 264.174 for containers). During the visual inspections, emission control equipment covers on tanks are to be checked semiannually by the facility workers to ensure that equipment is being used properly (i.e., covers are closed and latched except when an opening must be used in accordance with conditions specified in the rules) and the equipment is being maintained in good condition (e.g., no visible holes, gaps, tears, or splits have developed in covers).

Continuous monitoring of control device operation is required under the rules. This involves the use of automated instrumentation to measure critical operating parameters that indicate whether the control device is operating correctly or is malfunctioning. Semiannual leak detection monitoring using EPA Reference Method 21 also is required for certain cover components to ensure gaskets and seals are in good condition, and for closed-vent systems to ensure all fittings remain leak-tight. In addition, each closed-vent system must be monitored for leaks using Reference Method 21 at least once per year.

vii. Rcordkeeping Requirements. To provide the EPA enforcement personnel with a means of verifying compliance with the recommended standards, the owner or operator is required to record certain information documenting emission control equipment performance and maintenance in the on-site facility operating logs or files. This information will be available for review by the EPA enforcement personnel during on-site compliance inspection. The information to be collected and recorded includes: the results of all waste determinations such as of volatile organic concentration at the point of generation and organic vapor pressure; waste determination documentation for units not using air emission controls in accordance with the rule control requirements; design specifications for closed vent systems and control equipment inspection and control equipment; emission control equipment inspection and monitoring results; Reference Method 27 test results; control device exceedances and actions taken to remedy them; leak repairs; management or carbon removed from carbon adsorption systems, and identification of equipment fittings designated as difficult or unsafe to monitor or inspect.

At a facility where air emission control equipment required by the recommended rules cannot be in operation by the effective date, the owner or operator is required to prepare and record an

implementation schedule for the air emission control equipment. The implementation schedule must specify dates by which progress will be completed by the facility owner or operator that demonstrates and ensures the required air emission controls are in operation no later than three years after promulgation of the rules.

Consistent with §§264.73 and 265.73, the recommended standards require that all records be maintained in the facility operating record until facility closure except records and results of inspections and monitoring, which need to be kept for at least three years from the date of entry.

viii. Reporting Requirements. The recommended reporting requirements for the owner or operator of a TSDF are simple and straightforward. There are no reporting requirements for the owner or operator of an interim status TSDF. The owner or operator of a permitted TSDF is not required to submit any reports unless: (1) a control device malfunction is not corrected within 24 hours of detection; or (2) a hazardous waste with organic content at the point of waste generation that equals or exceeds the 500 ppmw mass-weighted average volatile organic concentration or that has been treated by a process that fails to meet applicable general requirements in the recommended rule is managed in a unit without proper emission controls. If any of these events (referred to as "exceedances) occur, the owner or operator is required to maintain a record of the exceedance. For control device exceedance, the owner or operator is required to submit a written report to the EPA on a semiannual basis describing any exceedances that occurred during the past 6-month period and explain why each exceedance occurred and what action was taken to remedy the situation. For waste exceedances, the owner or operator is required to submit a written report to the EPA within 15 calendar days of the time that the owner or operator becomes aware of the circumstances explaining why the hazardous waste was not managed in accordance with the requirements of the standards.

For some TSDF tanks, an owner or operator is allowed to use either a fixed roof with an internal floating cover or an external floating roof as an alternative to a cover vented to a control device. Reporting requirements for internal and external floating roofs require the owner or operator to notify the EPA at least 30 days prior to the filling of the empty tank to provide the EPA the opportunity to inspect the roof and seals for compliance with the standards prior to refilling. This requirement is necessary because the internal or external roof seals can only be inspected when the tank is empty. Inspection is required initially and no more than once every five years.

5(c) Small Entity Flexibility

The EPA recognizes that owners or operator of small businesses often do not have the

personnel and financial resources available to large companies for performing information collection. However, only information is required for the recommended standards that the EPA's experience has demonstrated to be necessary to determine compliance with air emission standards. Separate and simplified requirements for small businesses such as less frequent monitoring and inspection of emission control equipment operation cannot be used without compromising the protection of human health and the environment that would be provided by the recommended standards. The minimum information that the EPA's experience has demonstrated to be necessary to determine compliance with air emission standards is required. The specific information selected serves both the public interest, by ensuring all TSDFs comply with the air emission standards, and the best interest of the individual owner or operator to clearly demonstrate to the EPA enforcement inspector that a unit is in compliance.

The reporting, notification and recordkeeping burden to respondents has been minimized by requiring the collection or reporting of only that information which the Agency considers essential to ensure that affected storage tanks, surface impoundments and containers of hazardous waste exceeding 500 ppmw are properly maintained and operated on a continuous basis.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Section 6(d), Table 2: Industry Burden.

6. Estimating the Burden and Cost of the Collection

Section 6(d), Table 2 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for RCRA Subpart CC. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in this ICR. Responses to this information collection are mandatory. (See Section 4(b)(i). The 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 burden to the Agency can be found at Section 6(c), Table 1.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated at 617,040 person-hours. These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the RCRA program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses $49.62 per hour for Technical labor cost. This rate is from the United States Department of Labor, Bureau of Labor Statistics, Table 1-1. Summary, United States: Mean hourly earnings and weekly hours by selected characteristics, private industry and State and local government, National Compensation Survey, 1998 The wage rate includes a 110% overhead cost.

(ii) Estimating Capital and Operations and Maintenance Costs

The only cost associated with the information collection activity in the standards is labor cost. There are capital and operations and maintenance costs. The capital startup costs are a one time cost when a facility becomes subject to the standard. The annual operations and maintenance costs are the ongoing costs to maintain the emission control equipment.

(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs

The total Capital/Start-up costs for this ICR are $ $1,460,333. This cost is shown on the OMB 83-I form in block 14 letter a: Total annualized capital/startup costs. The numbers in block 14 of the OMB 83-I form are truncated to show the cost in thousands of dollars. This is the estimated cost for the 269 new facilities. There are no Operating and Maintenance (O&M) Costs for this ICR, therefore, the total Capital and O&M cost is $1,460,333.

Section 6 (c), Table 1 identifies the costs to the Agency associated with the analysis of submitted information relating to new, modification, or reconstruction notices sent to the Agency. Publication and distribution of the information are part of the Resource Conservation and Recovery Information System (RCRIS) which is jointly operated and maintained by the EPA's Office of Solid Waste (OSWER) and Office of Compliance (OECA) Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual burden to the Agency over the next three years from the recordkeeping and reporting requirements is estimated to be 52,380 hours. The costs to conduct this effort have been calculated on the basis of $17.09 per hour plus110 percent overhead. The average annual cost to the Agency over the next three years of the ICR is estimated to be $2,545,725. This cost is based on the possibility of a facility reporting a waste exceedance report, inspecting facilities for compliance with Subpart CC regulations and possible enforcement follow-up for violations.

6(c) Table 1 - Estimating Agency Burden and Cost as a Result of RCRA Subpart CC, Air Emission Standards for Tanks, Surface Impoundments and Containers

Hours per Occurrence	Annual Number of Responses	Total Annual Person Hours per year	Total Annual Labor Costs per year [a]
(A)	(B)	C = (AxB)	(D)

1. REVIEW REPORTS				
A. Waste Exceedance Reports	4	63 [b]	252	9,044
B. Control Device Exceedance Reports	4	32 [c]	128	**4,594**
2. COMPLIANCE INSPECTIONS				
A. Select site and review permit	8	520 [e]	4,160	149,302
B. Travel to/from site, labor	8	520 [e]	4,160	149,302
Travel to/from site, transp [d]		520		156,000
C. On-site Inspection	8	520 [e]	4,160	149,302
D. Prepare Inspection Report	16	520 [e]	8,320	298,605
3. ENFORCEMENT ACTIONS				
A. Notice of Non-Compliance	160	52 [f]	8,320	298,605
B. Follow-up Enforcement [9]	40	52 [f]	2,080	74,651
Travel to/from site, transp[d]		52		15,600
C. Litigation	2,080	10 [h]	20,800	1,381,120 [a.1]
TOTAL ESTIMATED HOURS AND COST:			**52,380**	**$2,545,725**

Assumptions

a Personnel costs based on $17.09 (GS-10, Step 1) plus 110 percent overhead ($35.89) for staff.
a.1 Personnel costs based on $31.62 (GS-14, Step 1) plus 110 percent overhead ($66.40) for attorney.
b Annual number of responses assumes 1% of waste determination results in an exceedance (1 % of 8,997 potential respondents)
c Annual number of responses assumes .5% of control devices malfunction resulting in an exceedance (.5% of 8,997 potential respondents)
d Average cost per trip for transportation and per diem is assumed to be $300.
e Annual number of inspections assumes each EPA Regional office schedules one compliance inspection of a TSDF per week.
f Annual number of notice of non-compliance assumes 10% of inspected facilities require enforcement actions to correct a problem.
9 Labor hours and travel costs per follow-up enforcement inspection assumed to be equal to values assumed for one compliance inspection as shown in Item 2B, above.
h Annual number of litigations assumes each EPA Regional Office initiates one legal case against a TSDF owner/operator per year.

6(d) Table 2 - Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC

	Hours per Occurrence (A)	Occurrences per respondent (B)	Hours per respondent per year C = (AxB)	Respondents per year (D)	Hours per year E = (CxD)	Cost per year[a] (F)
1. APPLICATIONS . . . . . .Not Applicable						
2. SURVEY AND STUDIES . . . . . .Not Applicable						

. . . . .						
3. REPORTING REQUIREMENTS						
A. Read Instructions	4	1	4	6,318	25,272	1,253,997
B. Required Activities	0					
C. Create Information	0					
D. Gather Existing Information	1	1	1	6,318	6,318	313,499
E. Write Report	Not Applicable					
4. RECORDKEEPING REQUIREMENTS						
A. Read Instructions	4	1	4	6,318	25,272	1,253,997
B. Plan Activities	16	1	16	6,318	101,088	5,015,987
C. Implement Activities						
I. Waste determination for VOC concentration at the point of origination a. Waste determination . once every 12 months	2	1	2	6,318	12,632	626,800
II. Waste determination for treated hazardous waste a. waste determination for batch process once every 12 months	2	1	2	6,318	12,632	626,800
III. Inspect and monitor each closed vent system	.08	365	29	4,413	127,977	6,350,219
IV. Write and implement an inspection plan and place in the facility inspection plan	4	1	4	90	360	17,863
V. Inspect all coverings and monitor for initial detectable emissions, initial operation, using Method 21						
a. Tanks	4	1	4	90	360	17,863
b. Surface Impoundments	5	1	5	90	450	22,329
c. Containers	2	1	2	90	180	8,932

Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC, cont.

	Hours per Occurrence (A)	Occurrences per respondent (B)	Hours per respondent per year C = (AxB)	Respondents per year (D)	Hours per year E = (CxD)	Cost per year[a] (F)
VI. Inspect all coverings and monitor for detectable emissions at least once every 6 months, using Method 21						

a. Tanks (includes Method transportation vehicles)	27 - 4	2	8	6,31 8	50,544	2,507,993
b. Surface Impoundments	5	2	10	110	1,110	55,078
c. Containers	2	2	4	6,318	25,272	1,253,997
Vll. O/O writes and implements plan with schedule to inspect unsafe covers	1	1	1	90	90	4,466
VIII. O/O writes and implements plan with schedule to inspect difficult to inspect covers	1	1	1	90	90	4,466
lX. Notify RA 30 days in advance of any gap measurements to be taken	1	1	1	6,318	6,318	313,499
X. Notify RA 30 days in advance of filling or refilling of tank	1	1	1	632 [b]	632	31,360
XI. Secondary seal inspection once a year	4	1	4	6,318	25,272	1,253,977
XII. Primary seal inspection once every 5 years	4	1	4	1264 [c]	5,056	250,879
XIII. General standards, Record ID number of BIF or incinerator used to treat waste	.25	1	.25	90	23	1,141
XIV. Tanks with unsafe covers, record list of identification numbers for tanks with unsafe covers, explain why its unsafe and a plan to inspect and monitor each cover	.30	1	.30	90	27	1,340
XV. Tanks with difficult to inspect covers, record list of identification numbers, explain why difficult and plan to inspect and monitor each cover	.30	1	.30	90	27	1,340

Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC, cont.

	Hours per Occurrence (A)	Occurrences per respondent (B)	Hours per respondent per year C = (AxB)	Respondents per year (D)	Hours per year E = (CxD)	Cost per year[a] (F)
D. Develop Record System	16	1	16	90	1,440	71,453

E. Time to Enter Information						
I. Record each cover installed on a tank and certifies to its specifications.	.25	1	.25	90	23	1,141
II. Record each floating membrane installed on a surface impoundment and certifies to its specifications.	.25	1	.25	90	23	1,141
III. Record each enclosure used to control air emissions and certifies to its specifications.	.25	1	.25	90	23	1,141
IV. Record for each closed vent and control device it is designed to operate at the performance level for tank, surface impoundment or container.	.25	1	.25	90	23	1,141
V. Records all Method 27 tests performed by O/O for each container.	.5	1	.5	6,318	3,159	156,748
Vl. Records all visual inspections of each tank, surface impoundment and container, including covers.	1	1	1	6,318	6,318	313,499
Vll. Records date of each attempt to repair leak, repair methods applied and date of successful repair	.5	2	1	6,318	6,318	313,499
VlII. Records all continuous monitoring	.25	365	91	632	57,512	2,853,745
IX. Records management of carbon removed from a carbon adsorption system	.5	2	1	4,413	4,413	218,973

Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC, cont..

	Hours per Occurrence	Occurrences per respondent	Hours per respondent per year	Respondents per year	Hours per year	Cost per year[a]
	(A)	(B)	C = (AxB)	(D)	E = (CxD)	(F)
E. Time to Enter Information, cont.						
Tanks with air emission controls						
X. Records date and time of						

each sample	.25	2	.5	6,318	3,159	156,750
XI. Records results of each sample	.25	2	.5	6,318	3,159	156,750
XII. Records tank dimensions and design capacity	.30	1	1	90	90	4,466
Tanks with alternative emissions controls (floating roofs)						
XIII. Records in the facility operating plan the internal floating roof	.25	1	.25	54	14	695
XIV. Records the equipment design and certifies that it meets applicable requirements	.25	1	.25	54	14	695
XV. Records each inspection, the tank, date, what components inspected.	.25	2	.5	6,318	3,159	156,750
a. If defects found, identify the tank and describe the repairs made.	.25	2	.5	6,318	3,159	156,750

Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC, cont..

	Hours per Occurrence (A)	Occurrences per respondent (B)	Hours per respondent per year C = (AxB)	Respondents per year (D)	Hours per year E = (CxD)	Cost per year[a] (F)
E. Time to Enter Information, cont.						
XVI. Records in the facility operation plan the external floating roof.	.25	1	.25	202	51	2,531
XVII. Records the equipment design and certifies that it meets						

applicable requirements	.25	1	.25	202	51	2,531
XVIII. Records gap measurements of the tank, date of inspection, raw data and calculations. .	.25	1	.25	6,318	1,580	78,400
a. If defects found, records the tank, date tank was emptied or repairs made and the nature of the repair.	.25	1	.25	6,318	1,580	78,400
F. Train Personnel						
i. Waste determination methods	8	1	8	6,318	50,544	2,507,933
ii. Control equip. inspection & monitor	8	1	8	6,318	50,544	2,507,933
G. Audits	Not Applicable					
TOTAL ESTIMATED ANNUAL HOURS					**617,040**	
TOTAL ESTIMATED ANNUAL COST						**$30,930,887**

Estimating the Respondent Universe and Total Burden and Costs as a Result of RCRA SUBPART CC, cont..

Assumptions for Table 2

a - Assume an hourly wage of $49.62 which includes the110% overhead cost.
b - Assume 10% of respondents will empty and re-fill a tank
c - Assume that 20% of the tank roofs will be inspected each year

Total number of respondents subject to TSDF requirements	2,025		
70% subject to these rules			1418
Total number of respondents subject to LQG requirements	20,316		
25% subject to these rules			5079
Total number of respondents over a three year period		**6497**	
Number of respondents - Annualized			**6318**

1418 TSDFs averaging 4 Tanks and 15 containers subject to regs
4 Tanks x 1418 = 5672
15 containers x 1418 = 21,270

5079 LQGs averaging 1 Tank (25%) or 6 containers (75%) subject to regs
1 Tank x 5079 x .25 = 1270
6 containers x 5079 x .75 = 22,856

Total Tanks subject = 6942
Total Containers subject = 44,126
10% of Containers using enclosed close-vent system = 4,413
Total Surface Impoundments = 110

Respondents using Method 25D for waste determinations	10%
Respondents reporting waste exceedances	1%
Respondents reporting control device operating parameter exceedances	.5%
Average number of waste streams on-site	10

Table 3. CAPITAL EXPENDITURE OF MONITORING EQUIPMENT REGULATING AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS, RCRA SUBPART CC

	Number (A)	Installation (B)	Cost C=(AxB)	# of New Install-ons (D)	Cost this ICR Period E=(BxD)
A. Roofs and Closed Vent Systems					
Item					
External Floating Roof	4671	$18,500 [a]	$79,662,000	202	3,737,000
Internal Floating Roof	1246	$10.000 [a]	$11,250,000	54	540,000
Closed Vent System	311	$ 8,000 [a]	$ 2,028,000	13	104,000
CAPITAL EXPENDITURE FROM 2000 -2003				**269**	**$4,381,000**
CAPITAL EXPENDITURE ANNUALIZED				**90**	**$1,460,333**
B. Continuous Monitoring Inspections					

	Hours per Occurrence (A)	Occurrences per respondent (B)	Hours per respondent per year C = (AxB)	Respondents per year (D)	Hours per year E = (CxD)	Cost per year[a] (F)
For Closed Vent Systems:	4	1	4	6,318	25,272	1,253,997
For Roof Inspections/ Gap Measurements:						
Secondary seal inspection once a year	4	1	4	6,318	25,272	1,253,997
Primary seal inspection once every 5 years	4	1	4	1,264 [b]	5,056	250,879
					55,600	**$2,758,873**

a Cost estimates provided by ASTT Corp., New Providence, PA. An installer of floating roof systems and VOC monitors.
b Assume that 20% of the floating roofs with primary seals will be inspected each year.

Respondent Universe					
Regulation Title	(A) # new sources per year	(B) # of initial reports for new sources	(C) # existing sources	(D) # of reports for existing sources	(E) total annual responses (AXB)+(CXD)
RCRA Subpart CC	90	*	6228	*	*

* - See explanation in annual responses paragraph

The total number of affected sources is 6,318. This number is the sum of column A and column C of the *Respondent Universe* table. It is shown on the OMB 83-I form in block 13 a. This is the number of existing sources plus the number of new sources anticipated in one year.

The total number of annual responses is 95. This assumes 1% of waste determination results in exceedance (1% of 6,318 potential respondents) plus the assumption that .5% of control devices malfunction resulting in an exceedance (.5% of 6,318). This number is in column E of the *Respondent Universe* table. It is shown on the OMB 83-I form in block 13 b.

The total annual capital, O&M and compliance costs to the regulated entity are $35,150,193, while Capital and O&M costs are $1,460,333 and are shown on the OMB 83-I form in block 14 c. These costs are detailed in section *6 b (iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs.*

6(e) Bottom Line Burden Hours And Cost Tables

See Section 6(c), Table 1, EPA's Burden for complete details. In summary, the burden to the Agency is 52,380 hours at a cost of $2,545,725 a year. Section 6(d), Table 2, Respondents' Burden has the complete details for industry. In summary, the burden to comply with RCRA Subpart CC is 672,640 hours at a cost of $33,689,760 per year. Total Capital and O&M costs are $1,460,333.

6(f) Reasons for Change in Burden

The change in burden is due to the increase in the number of facilities subject to RCRA Subpart CC, from 6,228 to 6,497 or a difference of 269 facilities. The information that determined this change (increase) was data obtained from comparing 1995 and 1997 (most recent and available) RCRA Biennial Reports.

6(g) Burden Statement

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop,

acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing a respondent's burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, Office of Environmental Information (OEI), U.S. Environmental Protection Agency, Mail Code 2822, 1200 Pennsylvania Avenue, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Include the EPA ICR number 1593.05 and OMB control number 2060-0318 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.