

**INFORMATION COLLECTION REQUEST SUPPORTING STATEMENT**

**PART A**

**United States Environmental Protection Agency**

**Drum Reconditioning Resource Conservation and Recovery Act (RCRA)  
3007 Mandatory Information Collection Request**

**OMB Control Number: 2050-xxxx  
EPA ICR Number: xxxx.xx**

February 27, 2024

## Table of Contents

	Page
1. Importance of the Information.....	1
2. Purposes and Uses of the Data.....	2
3. Improved Information Technology.....	3
4. Efforts to Identify Duplication .....	4
5. Methods Used to Minimize Burden on Small Entities.....	5
6. Consequences of Not Collecting the Information .....	6
7. Adherence to the Guidelines in 5 CFR 1320.5 .....	7
8. Publication in Federal Register and Consultations with Stakeholders.....	7
9. Payments to Respondents .....	8
10. Assurance of Confidentiality.....	8
11. Sensitive Questions.....	8
12. Estimates of Response Burden .....	8
13. Estimates of Cost Burden for Collection of Information .....	10
14. Estimates of Cost to the Federal Government .....	10
15. Changes in Burden .....	12
16. Publication Plans/Time Schedule.....	12
16(a) Collection Schedule .....	12
16(b) Publication of Results.....	12
17. Approval to Not Display Expiration Date .....	12
18. Exceptions to the Certification Statement .....	12

## List of Tables

Table 4-1. Existing Data Sources.....	4
Table 12-1. Summary of Respondent Hour Burdens.....	9
Table 12-2. Burden per Questionnaire Estimate .....	10
Table 14-1. EPA Wages .....	11
Table 14-2. Burden per Questionnaire Estimate .....	11
Table 16-1. Collection Schedule.....	12

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## 1. Importance of the Information

The U.S. Environmental Protection Agency (the EPA or the Agency) is soliciting information to assist in the potential development of non-regulatory and regulatory options that would ensure the proper management of used industrial containers that held hazardous chemicals or hazardous waste, up to and including the drum reconditioning process. Options could include revising the Resource Conservation and Recovery Act (RCRA) regulations or other, non-regulatory options.

Drum reconditioning facilities recondition metal and plastic drums and intermediate bulk containers (IBCs) for resale and reuse by cleaning, restoring, testing, and certifying these industrial containers. These containers previously held a variety of materials including hazardous waste, chemicals, paints, resins, tars, adhesives, foods, oils, soaps, solvents, or related materials. The two main processes used for reconditioning are burning off residue from metal drums in a drum furnace and washing metal or plastic drums or containers with water and/or a caustic solution to clean out residues.

On September 8, 2022, the EPA published a Drum Reconditioner Damage Case Report (DCR) that described the EPA's understanding of how the drum reconditioning industry operates and documents damage case incidents at facilities that have caused significant harm to human health and the environment. The report also served to inform domestic policymakers, enforcement officials, and the public about the regulatory and waste issues surrounding drum reconditioning facilities and served as the EPA's first step to gather information and engage stakeholders on approaches to address and mitigate these issues.

The DCR's findings indicate an estimated national drum reconditioning universe of 181 facilities with approximately 40 million total metal and plastic containers being processed each year. The data also indicates that approximately 35% of drums are reconditioned using drum furnaces, and the remaining 65% of containers are reconditioned through washing methods. Of the total 181 drum reconditioning facilities identified by the EPA, 86 had one or more reported damage cases, representing 47.5% of the total industry.

The EPA's data also indicates that 25% of drum reconditioning facilities that are currently operating have had damage cases, 23 facilities experienced damage cases between 2011 and the present, and 58 of the 86 facilities that experienced damage cases had at least one incident occur after the empty container provision, found in 40 CFR 261.7, was promulgated in 1980. Damages include fires; drum explosions; hazardous waste spills; leaking caused by improper storage of drums/containers; employee injuries; air, water, or soil contamination; and various combinations of these incidents.

An Advance Notice of Proposed Rulemaking (ANPRM) was published in the Federal Register (88 FR 54537) on August 11, 2023 that gives additional details on the need for data and provides an opportunity to comment on the potential development of non-regulatory and regulatory options that would ensure the proper management of used industrial containers that held hazardous chemicals or hazardous waste, up to and including the drum reconditioning process.

EPA, through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) review and approve the ICR for the Drum Reconditioning Facilities Data Collection. Through this collection, EPA will obtain data essential to determine the current practices in acceptance, storage, handling, and management of non-RCRA empty containers; emissions from drum furnaces; management of wastewaters and other wastes generated from drum reconditioning; and emergency response, training and permitting practices at drum reconditioning facilities. This collection effort is necessary because there are limited national data on these topics from drum reconditioning facilities and no previous federal rulemaking (air or water) efforts have focused on this industrial sector. A limited amount of information from varied sources was compiled on drum reconditioning facilities by EPA's Office of Water between 1989 and 2000, but this information does not address important aspects of hazardous waste management and may be out of date.<sup>1</sup>

A questionnaire for the Drum Reconditioning industry is an essential portion of the rulemaking process, necessary for EPA to determine if the current regulations or voluntary actions remain appropriate and, if warranted, develop new regulations or voluntary actions. The data collection activities described in this ICR will provide a robust data set that characterizes drum reconditioning acceptance, storage, and handling practices; air emission and control techniques; and wastewater generation, treatment, and discharge from drum reconditioning facilities in the United States.

## **2. Purposes and Uses of the Data**

EPA's Office of Resource Conservation and Recovery plans to administer the data collection, in the form of a one-time questionnaire under the authority of RCRA 3007. EPA plans to administer a questionnaire to all active facilities that currently conduct drum reconditioning operations in the United States. Based on the data sources discussed in Section 4, EPA has identified and compiled mailing addresses for approximately 216 drum reconditioning facilities in the United States. All active drum reconditioning facilities will be required to complete the questionnaire regardless of size or geography. Because no single existing data source includes information for all facilities engaging in one or more of the specified drum reconditioning operations, the exact number of facilities is unclear. EPA estimates the population of drum reconditioning facilities that will receive and be required to complete the questionnaire as 216 facilities.

The objectives of the questionnaire will be to confirm the population of facilities that engage or have engaged in drum reconditioning operations, as well as gather facility-specific information and data relevant to the facility operations, security, employee safety, management, and discharge of air emissions, solid waste, and wastewater by the industry, including:

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<sup>1</sup> Preliminary Data Summary for Industrial Container and Drum Cleaning Industry, United States Environmental Protection Agency, June 2002, [https://www.epa.gov/sites/default/files/2015-11/documents/industrial-container-drum-cleaning\\_preliminary-data-summary\\_2002.pdf](https://www.epa.gov/sites/default/files/2015-11/documents/industrial-container-drum-cleaning_preliminary-data-summary_2002.pdf).

- Facility name, location, contact information, EPA identification numbers, industrial classification, and operating status.
- Information on applicable air, solid waste, and wastewater permits.
- Details on drum reconditioning operations, including the type(s) of processes performed.
- Quantities and characteristics of air emissions, solid waste, and wastewater generated on site.
- Financial, ownership, and employment data for individual facilities and their respective ultimate parent companies.

The questionnaire consists of 59 questions. A copy of the draft questionnaire is included in Appendix A. EPA believes that all the information and data requested in the questionnaire is readily available to facilities; EPA does not anticipate facilities will need to generate new information or data to complete the questionnaire. The data items requested by the questionnaire and the purpose for requesting the information will be presented in a separate table once the survey questions have been finalized following respondent consultation. [This table is under development and will be completed once the questions are finalized to avoid repeating effort.]

EPA prepared the questionnaire to be applicable to a variety of facilities; therefore, not all questions will apply to every company or facility. Facilities that receive the questionnaire but have not conducted drum reconditioning operations after January 1, 2023, or have permanently closed as of January 1, 2023, are instructed not to complete the questionnaire. Most facilities will not be required to complete every question in the questionnaire. For example, facilities that did not generate wastewater, operate wastewater treatment, or discharge wastewater in 2023 will be instructed to skip entire sections or sets of questions in the questionnaire.

EPA plans to conduct the questionnaire via a web-based platform, Qualtrics Survey Software (Qualtrics). The questionnaire will primarily collect data for calendar year 2023, which represents the most recent year for which complete technical and economic data will be available, as EPA expects the survey will be administered in 2024. The questionnaire will also collect limited data for time periods prior to 2023.

### **3. Improved Information Technology**

EPA plans to develop the questionnaire in Qualtrics, which allows respondents to fill out and submit the questionnaire online. The Qualtrics questionnaire will be developed to meet the 1998 Government Paperwork Elimination Act (GPEA). EPA anticipates that most respondents will be familiar and comfortable with online submission. Additionally, the Qualtrics questionnaire will include automatic validation checks to minimize data entry errors and allow for automatic export of a response data set, reducing the potential for errors introduced by key-entry of data. EPA's email and phone helpline will also be available during the response period to assist facilities as needed with submitting responses.

EPA designed the questionnaire to include burden-reducing features. For example, the questionnaire also contains “screening” questions that direct respondents that do not qualify as the population of interest for a particular subset of questions to indicate their status and then bypass this subset of questions to continue their response. The questionnaire is also designed with drop down menus to simplify and standardize responses, minimizing the number of narrative text responses.

EPA will provide a mechanism for facilities to respond with a hardcopy mailed response if the facility cannot access the internet. EPA anticipates this situation to affect less than 2 percent of the total population that receives the questionnaire.

#### 4. Efforts to Identify Duplication

The list of drum reconditioning facilities was originally developed for the DCR. Facilities were identified by searching available online databases, news articles, waste facility websites, and other EPA records and databases (i.e., the Definition of Solid Waste (DSW) Damage Case Report, RCRA Info Web, EPA’s 2002 “Preliminary Data Summary for Industrial Container and Drum Cleaning Industry” and 2014 “An Assessment of Environmental Problems Associated with Recycling of Hazardous Secondary Materials: Appendix 1- Damage Cases from Recycling of Hazardous Secondary Materials” reports, and EPA Superfund Site Database). Additional facilities were identified through the Pipeline and Hazardous Materials Safety Administration (PHMSA). See Table 4-1 below for a list of data sources. Currently operating facilities were further verified through a publicly available list published by the Reusable Industrial Packaging Association (RIPA), which claims to represent over 90% of the industrial packaging reconditioning industry in North America.

**Table 4-1. Existing Data Sources**

Data Source	Date of Data Collection	Population Included	Available Data	Considerations
An Assessment of Environmental Problems Associated with Recycling of Hazardous Secondary Materials: Appendix 1- Damage Cases from Recycling of Hazardous Secondary Materials	2014	Facilities identified in damage cases	<ul style="list-style-type: none"> <li>Name, location, and EPA ID</li> <li>Site description</li> <li>Site history</li> <li>Damage that occurred</li> <li>Activities associated with the damage</li> </ul>	This source includes only those facilities with damage case reports and is not a comprehensive list
Pipeline and Hazardous Materials Safety Administration (PHMSA) Active M number list	2023	Facilities issued M-number approval by PHMSA	<ul style="list-style-type: none"> <li>Name, location and EPA/RCRA/State ID</li> <li>Open or closed</li> <li>If there is a damage case</li> <li>If site is a Superfund</li> <li>NPL Site Status</li> <li>RIPA member</li> </ul>	This source includes all facilities issued a PHMSA M-number approval, not only drum reconditioning facilities.

Data Source	Date of Data Collection	Population Included	Available Data	Considerations
PHMSA "R" List	November 17, 2018	Facilities issued a Registration number by PHMSA	<ul style="list-style-type: none"> <li>Name, location and R-number ID</li> <li>Open or closed</li> </ul>	This source includes all facilities issued a PHMSA R-number approval, not only drum reconditioning facilities.
Reusable Industrial packaging Association (RIPA) membership list	2023	Facilities with membership in RIPA	<ul style="list-style-type: none"> <li>Name, location and phone number</li> <li>Container types</li> </ul>	This source includes only those facilities that choose to be members of RIPA.

As described in the limitations discussion in the DCR, EPA noted that "All of the information in the report was gathered from publicly available sources and in many cases, the company's website was the only source of information on a specific facility. A number of drum reconditioning facilities don't have webpages at all making it at times difficult to find information on this industry." EPA noted in the DCR that "besides RIPA, NAICS codes, and internet database searches, no other comprehensive database for drum reconditioners exists, making it difficult to know if all facilities were captured in this report."

As for the information on drum acceptance, storage, handling practices, air emissions data, and waste and wastewater generation and discharge data, since no previous regulatory efforts have been undertaken on drum reconditioning facilities, there is no pre-existing database available to obtain the air emission and wastewater discharge information for these facilities in the level of detail that would enable assessment of the need for regulatory or nonregulatory efforts to minimize environmental releases.

## 5. Methods Used to Minimize Burden on Small Entities

In accordance with requirements of the Regulatory Flexibility Act (RFA), EPA must assess whether actions would have "a significant impact on a substantial number of small entities" (SISNOSE). Small entities include small businesses, small organizations, and small governmental jurisdictions.

EPA has taken steps to ensure that the respondent burden is minimized for small entities, while collecting sufficient data to evaluate regulatory flexibility for small entities. EPA will identify the size of the business entity according to Small Business Administration definitions from questionnaire information through sales revenues and company employment. For entities reporting under NAICS code 811310, the Small Business Administration defines small entities as those with annual average receipts of \$12.5M or less. Based on available information, EPA believes most drum reconditioning facilities and parent companies would meet this Small Business Administration definition. The financial and economic information collected in the questionnaire is necessary to perform the economic analysis of any proposed rulemaking in order to meet the requirements of the Small Business Regulatory Enforcement Fairness Act (SBREFA).

To minimize the burden of responding to the questionnaire, EPA has written a series of questions that will preclude facilities from completing the entire questionnaire if they are identified as not conducting drum reconditioning operations. Additionally, the questions are phrased with commonly used terminology and the tables are organized in formats familiar to the respondent industry.

## **6. Consequences of Not Collecting the Information**

This ICR is to be conducted once with drum reconditioning facilities, but depending on some of the responses, may result in the need to reach out to other facilities that ship used drum containers to drum reconditioning facilities. Without this data collection, the EPA cannot fulfill its Clean Air Act (CAA) statutory requirement to regulate toxic air pollutants, in addition to the general duty to protect human health and the environment from potential hazardous waste releases from drum reconditioning facilities. Drum reconditioning is currently not directly covered by the Clean Air Act. In terms of air quality, the DCR identified sources of unidentified, unquantified, and unmonitored air emissions that may contain hazardous materials and abandoned sources of hazardous air pollutants. In addition to air quality impacts, this report identified damage to human health, soil and water, and unsafe conditions for workers and the communities surrounding these facilities.

The DCR revealed that used drums may not be empty upon receipt at drum reconditioning facilities and may contain unknown potentially hazardous materials. The used drum generator is responsible for the hazardous waste that they generate, but if the content of the used drums is not identifiable at the time that they are shipped, then the drum reconditioner cannot know with any confidence what they are treating or the risks associated with treatment, and the used drum generator may not be able to provide this information after it has been shipped. This ICR requests that drum reconditioning facilities identify whether they receive containers with hazardous materials and how much. Without this information the EPA cannot accurately quantify the amount of hazardous material received by drum reconditioning facilities or the potential for hazardous air pollutant emissions from these facilities. This ICR may also reveal the need for additional monitoring of hazardous materials at used drum generators before sending them to drum reconditioning facilities in order to protect the facility, collocated companies, and the public.

The DCR identified multiple instances of sites containing tens of thousands to hundreds of thousands of gallons of hazardous waste onsite at drum reconditioning facilities as well as some facilities with unknown amounts of hazardous waste but with the potential to have received millions of gallons of hazardous waste. Some of these facilities were abandoned and at risk of being accessed by the public. Additionally, there were multiple cases that resulted in millions of dollars of cleanup costs. This ICR requests information about the storage of the hazardous waste containers, the security of the facility and the foreseeable future of the facility to ensure that the public and nearby companies cannot be exposed to the hazardous waste during operations and in the event of closure. Without this information, future hazardous waste cleanups may arise without the knowledge of regulatory authorities, either the EPA or state and



local regulators. Additionally, future incidents of public exposure to hazardous waste could occur without knowing that the risk exists until after the fact.

Two primary methods are used to recondition drums: 1.) burning off residuals, 2.) and caustic wash. Depending on how a facility operates it could produce air emissions due to either method and be subject to air quality regulations, or it could potentially discharge water to the environment containing hazardous materials and be subject to regulations under the Clean Water Act. Some of these facilities may also be governed by solid waste regulations. One example of this is that some of these facilities may be subject to 40 CFR 63 Subpart EEE: National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors and the associated monitoring and performance testing requirements or they may also have a National Pollutant Discharge Elimination System (NPDES) permit. This ICR requests information on the environmental permits drum reconditioning facilities already have and how they operate under those permits. Without this information the EPA will not be able to differentiate between which environmental impacts are the result of non-compliance of existing permits, which impacts are due to unpermitted facilities needing permits under existing regulations and which companies do not currently need any permits but are still potential sources of hazardous air pollutants, discharge water containing hazardous materials and hazardous solid waste. This information will help prevent duplicating regulations and allow the proposed rulemaking to work in concert with existing rules.

This drum reconditioning facility ICR will provide necessary information to understand the current operating and regulatory landscape, improve existing regulatory requirements to protect the environment and the public, and support the development of new regulations in concert with existing regulations. The DCR demonstrates the need to collect this information and develop new regulations through numerous cases of environmental impacts, costly cleanup, legal action, and harm to both employees at these facilities and the public.

## **7. Adherence to the Guidelines in 5 CFR 1320.5**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR §1320.5(d)(2).

## **8. Publication in Federal Register and Consultations with Stakeholders**

### **Federal Register**

\*THIS CONTENT WILL BE UPDATED AFTER THE PUBLICATION OF THE 1ST FEDERAL REGISTER NOTICE.\*

### **Consultations**

Under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an original or renewal ICR to OMB for review and approval. Consultations are currently ongoing and the final results will be reported during the next public comment period.

## **9. Payments to Respondents**

No payments or gifts are provided to respondents.

## **10. Assurance of Confidentiality**

All information submitted to the Agency in response to the ICR that is claimed as confidential will be managed in accordance with applicable laws and EPA's regulations governing treatment of confidential business information at 40 CFR Part 2, Subpart B. Any information determined to constitute a trade secret will be protected under 18 U.S.C. § 1905.

## **11. Sensitive Questions**

This collection does not include any data or information of a sensitive nature.

## **12. Estimates of Response Burden**

Total Responses Burden Estimate: \$363,000 (\$1,680 per respondent)

Total Hour Burden Estimate: 3,560 hours (average of 16 hours per respondent)

### **Methodology**

The Drum ICR effort will require recipient facilities to devote time and resources to produce acceptable responses to a questionnaire. This is expected to be a one-time effort. No environmental sampling or experimental data will be required. Some data analysis or managerial review may be required if recipients believe that some of the requested data contains sensitive data. The EPA expects that operators, engineers, operations managers, finance specialists and technical staff at the facilities will devote time toward gathering requested information and data, preparing and submitting the final responses to the questionnaire. Legal staff is most likely not necessary for the information collection, but some facilities may decide to enlist aid from legal staff for some of the general information that refers to other companies or legal documents (permits). The costs to the respondents' facilities associated with these time commitments can be estimated by multiplying the time spent in each labor category by an appropriately loaded hourly labor rate.

To develop the burden estimates, the EPA estimated the number of hours required to complete all parts of the questionnaire, including reviewing instructions, gathering data, entering the information requested, reviewing responses, and submitting the questionnaire. The EPA has differentiated the hours that will be spent by distinct types of facilities by assuming 50% of facilities include a drum furnace and 50% have on-site water treatment. These assumptions adjust the burden for 108 respondents by removing 6 questions referencing drum furnaces and 1 question referencing on-site water treatment. The burden estimate otherwise assumes that all facilities will fill out the remaining questions. This burden estimate represents a conservative estimate since the EPA does not expect a full 50% of facilities to have to fill out the entire

questionnaire. However, how many facilities will not have to fill out the entire questionnaire is unknown.

The EPA expects that questionnaire response will be led by the technical staff or operations managers as most questions are specific to recordkeeping of technical data and environmental permitting. EPA has included hours for engineering staff to support collecting data and entering details related to production as well as finance specialists to support details related to financial information requested in the questionnaire.

The EPA obtained mean labor rates from the May 2022, US Department of Labor, Bureau of Labor Statistics website for National Industry-Specific Occupational Employment and Wage Estimates for NAICS code 562220 -Waste Treatment and Disposal. To account for additional costs to the employer for benefits and overhead the EPA applied a 50% increase for Fringe Benefit loading and a 40% increase for Overhead and Profit rate. The direct labor cost to respondents to complete the questionnaire equals the time required to read and understand all instructions, gather relevant information and data, transfer it to the questionnaire response, review responses, and certify and submit the completed questionnaire. To estimate the time required for each question the following hierarchy was used:

- Every simple yes/no question and short questions with readily available answers take a minimum of 5 minutes.
- A question requires 10 minutes if it involves readily available information but requires an description or similar textual response.
- A question requires 20 or 30 minutes if the respondent may need to search for information depending on the complexity and magnitude of the required information.
- A question requires 30 minutes to 1 hour if the respondent needs to search for and analyze information depending on the complexity and magnitude of the required information.

The total burden for the questionnaire equals the estimated burden per facility for all facilities EPA expects will respond. The EPA expects that there are approximately 216 drum reconditioning facilities and for a conservative assessment assumes 100% response because the collection will be mandatory and response can be enforced.

The following tables show the summary of respondent hour burdens and the burden per questionnaire estimate.

**Table 12-1. Summary of Respondent Hour Burdens**

<b>Summary of Respondent Burden and Cost</b>	<b>Total Labor Hours</b>	<b>Labor Costs</b>	<b>Non-Labor (Capital/Startup and O&amp;M) Costs</b>	<b>Total Costs</b>
Total (rounded)	3,560	\$363,000	\$0	\$363,000
Average per respondent (rounded)	16	\$1,680	\$0	\$1,680

**Table 12-2. Burden per Questionnaire Estimate**

Burden item	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per respondent	Respondents	Technical hours (E=CxD)	Management hours (F=Ex0.05)	Clerical hours (G=Ex0.1)	Total cost (\$)
General Information	0.86	216	186	9.29	18.6	\$21,800
Technical Information	5.72	216	1240	61.8	124	\$145,000
Security	0.41	216	88.6	4.43	8.86	\$10,400
Safety	2.53	216	547	27.3	54.7	\$64,100
Drum Washing and Wastewater	3.52	216/108*	652	32.6	65.2	\$76,500
Solid waste	1.33	216	233	11.7	23.3	\$27,300
Drum furnace and other air emission points	1.44	108	156	7.78	15.6	\$18,200
<b>Total (Rounded)</b>				<b>3,560 hours</b>		<b>\$363,000</b>

\*One question in the Drum Washing and Wastewater section is assumed to apply to 50% of facilities. The remaining questions in this section apply to all facilities.

### 13. Estimates of Cost Burden for Collection of Information

Total Annual (non-Labor) Cost Burden Estimate: 0

#### Methodology

The EPA does not expect there to be significant cost burden beyond the hour burden to respondents or recordkeepers resulting from the collection of information. The information collection request does not require generating additional data or adding monitoring, recordkeeping or reporting equipment or systems not already in place.

### 14. Estimates of Cost to the Federal Government

Total Federal Government Cost Burden Estimate: \$67,200 (\$310 per respondent)

Total Federal Government Hour Burden Estimate: 1,260 hours (6 hours per respondent)

#### Methodology

The EPA estimated wages based on U.S. Office of Personnel Management Pay & Leave Salaries and Wages 2023 with a 60% increase for Fringe Benefits and overhead. The following table shows the EPA wages:

**Table 14-1. EPA Wages**

Category	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	\$34.07	\$54.51
(GS- 13, step 5) - Mgmt.	\$45.91	\$73.46
(GS-6, step 3) - Cler.	\$18.44	\$29.50

The hour burden on the EPA was calculated in a similar fashion to the respondent burden with the following hierarchy:

- Assume every question takes 1 to 5 minutes minimum (includes help-line support to respondents, development of a frequently-asked question support document, review of respondent responses, and follow-up with respondents as needed).
- 10 to 20 minutes to review information provided for items the respondent had to search for but not analyze.
- Up to 30 minutes to review for anything the respondent must analyze. This will vary substantially depending on the complexity and magnitude of the response and how much verification and analysis is required on the EPA's part.

The following table shows the EPA's burden per questionnaire estimate.

**Table 14-2. Burden per Questionnaire Estimate**

Burden item	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per respondent	Respondents	Technical hours (E=CxD)	Management hours (F=Ex0.05)	Clerical hours (G=Ex0.1)	Total cost (\$)
General Information	0.52	216	112	5.62	11.2	\$5,810
Technical Information	1.37	216	296	14.8	29.6	\$16,500
Security	0.14	216	30.2	1.51	3.02	\$1,060
Safety	0.69	216	149	7.45	14.9	\$5,150
Drum Washing and Wastewater	1.04	216/108*	192	9.61	19.2	\$13,300
Solid waste	0.94	216	171	8.53	17.1	\$8,450
Drum furnace and other air emission points	1.38	108	149	7.45	14.9	\$15,600
<b>Total (Rounded)</b>	<b>1,260 hours</b>					<b>\$67,200</b>

\*One question in the Drum Washing and Wastewater section is assumed to apply to 50% of facilities. The remaining questions in this section apply to all facilities.

## 15. Changes in Burden

This is a new information collection request, therefore there is no change in burden.

## 16. Publication Plans/Time Schedule

EPA does not plan to publish the information gathered under the auspices of this collection, but may do so in the future if appropriate.

### 16(a) Collection Schedule

The specific dates for distribution, response receipt, and data collection activities for the questionnaire have not yet been established but will include the activities in Table 16-1. EPA's intention is to ensure that facilities have at least 60 days to prepare and submit their response to the questionnaire.

**Table 16-1. Collection Schedule**

Activity	Estimate of Schedule
EPA notification to questionnaire recipients	Within 30 days after OMB Approval
Facilities submit responses	At least 60 days following notification
EPA reviews responses and evaluates need for follow-up	3 months following questionnaire completion
EPA conducts follow-up to collect all missing or incomplete information	2 months
EPA completes questionnaire database	4 weeks

### 16(b) Publication of Results

Information that has not been claimed as Confidential Business Information (CBI) may be shared with any interested parties. Nonexempt information is not protected from disclosure under the Freedom of Information Act (FOIA). Results of EPA's analyses become publicly available most often in three ways: (1) within materials placed in the public docket supporting the rulemaking, (2) within development and supporting documents otherwise published in support of the rulemaking, and (3) within any proposed and final rules published in the *Federal Register* if the data is to be used in any rulemaking effort. These documents are available through EPA's website and on regulations.gov.

## 17. Approval to Not Display Expiration Date

No exemptions are being sought. The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

## 18. Exceptions to the Certification Statement

No exceptions to the certification statement are being sought. EPA can comply with all provisions of the Certification for Paperwork Reduction Act Submissions.