

| Cross-Walk to WA 06-17 EIA Supporting Information WordDoc | EPA Checklist # and Rule Title   | Final Rule language/summary  | effective date                  | is the Rule Optional?  | HSWA              | Supporting Information from Federal Register   | NAICS Codes                  | State information on impacted entities  | Calcs  | Cost Estimates: Impact to Wisconsin Industry                              |
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| A   | 217<br>NESHAP Final Standards for HW Combustors  | The amendments to the October 2005 final rule clarify several compliance and monitoring provisions, and also correct several omissions and typographical errors. EPA is finalizing the amendments to facilitate compliance and improve understanding of the final rule requirements.   | 4/8/2008                        | YES  | HSWA and Non-HSWA | Only affects hazardous waste combustion facilities (licensed TSDFs). At present there are no affected entities operating in Wisconsin  | NA                           | No identified WI entities.  | NA   | No cost increase with implementation                                      |
| B   | 218<br>F019 Exemption for Waste Water Treatment Sludges from Auto Manufacturing Zinc Phosphating Process | EPA is de-listing F019 wastewater treatment sludges specifically generated from zinc phosphating, when such phosphating is used in the motor vehicle manufacturing process, provided that the wastes are not placed outside on the land prior to shipment to a landfill for disposal, and the wastes are placed in landfill units that are subject to or meet the specified landfill design criteria.      | 6/4/2008                        | YES  | Non-HSWA          | EPA estimates that there will be an added recordkeeping requirement for generators. However, the rule will result in a <b>net reduction annual paperwork burdens</b> when taken in conjunction with the reduced hazardous waste management requirements due to the exemption (manifest and reporting reductions). EPA expects this net cost savings to be further supplemented by annual cost savings to these same facilities from <b>reduced waste management costs</b> , by the expected shift of sludge management from RCRA Subtitle C hazardous waste management, to RCRA Subtitle D nonhazardous waste management   | NAICS 336111<br>NAICS 336112 | Automobile manufacturing NAICS 336111 = 22 WI facilities; 1129 US facilities total and Light truck/utility vehicle manufacturing NAICS 336112 = 4 WI facilities ; 321 US facilities total. Totalling all facilities in WI, WI represents 1.8% of national effected entities.<br>WI Disposal cost for F019 = \$120-\$670/ton (higher cost range is price per barrel) | WI industries with high vol. generation of F019 shipped approximately 26 tons/year. Assuming average disposal cost of \$395/ton, cost of disposal for F019 = approximately \$10,000/year, per facility | Cost Savings estimate for high volume generators of F019: \$10,000 / year |
| C   | 222<br>OECD Requirements; Export Shipments of spent Lead – Acid Batteries                                | The rule impacts transboundary movement of hazardous waste among countries for spent lead-acid batteries intended for reclamation in a foreign country, exception reports concerning hazardous waste exports, and import consent documentation to incoming hazardous waste import shipments along with submitting import consent documentation and RCRA hazardous waste manifest for each import shipment. | 7/7/2010                        | NO   | Non-HSWA          | Per the Federal government's special role in matters of foreign policy, <b>EPA does not authorize States to administer Federal import/export functions</b> in any section of the RCRA hazardous waste regulations. However, State programs are still <b>required to adopt</b> those provisions in today's rule that are more stringent than existing federal requirements to maintain their equivalency with the federal program.<br><br>EPA estimated that the annual public reporting burden for the new paperwork requirements in the final rule is 4.63 hours/year per respondent under the final OECD revisions; 20.74 hours/year per respondent under the final SLAB revisions; and 8.44 hours/year per respondent under the final import consent documentation. The annual public recordkeeping burden is estimated to average 10.20 hours/year per respondent under the final OECD revisions, and 0.25 hours/year per respondent under the final SLAB revisions. | NA                           | EPA's export data showed that since 2016 there are 3 facilities in Wisconsin that export spent lead acid batteries.   | Paperwork requirements:= 4.63+20.74+8.44 = 33.81 hours/year @~\$25.00/hour x 3 WI facilities.  | Cost Increase estimate for impacted facilities: \$2500/year or less total |
|   |  |  |                                 | Paperwork requirements:= 10.20 + 0.25 hours/year @~\$25.00/hour x 3 WI facilities. |                   |  |                              |   | Cost Increase estimate to impacted facilities: \$785/year or less  |   |
| D   | 223<br>HW Technical Corrections and Clarifications   | The rule makes a number of technical changes that correct existing errors and clarifies or updates existing parts of the hazardous waste regulatory program. States are required to adopt the revisions to the manifest regulations.   | 6/16/2010<br>Yes, except 262.23 |  | HSWA/ Non-HSWA    | All authorized states will be required to adopt the revisions to the manifest regulations in 40 CFR 262.23 in accordance with the consistency requirements in 40 CFR 271.4(c). See 70 FR 10811, March 4, 2005 for a further discussion of this provision<br><br>The manifest amendments in this action impose recordkeeping and reporting burden to generators and designated facilities subject to these manifest change, specifically for rejected load shipments and container residue shipments that require the completion of a new hazardous waste manifest. EPA projected a negligible burden associated with hazardous waste shipments returned to the generator as <b>proposed changes will only affect 308</b> shipments annually (nationally), and only an extremely small fraction of those returned shipments will require the completion, submission, and recordkeeping of an exception reports.   | NA                           | WI TSD information requests indicated an average of 25 manifest rejections per year, in total (all TSDs combined).  | Recordkeeping and reporting burden: 25 exemption forms/year @ ~3 hrs/form, and @ \$25/hr rate, the estimated reporting costs < \$2000  | Cost Increase estimate for impacted facilities: \$2000/year or less       |
| E   | 225<br>Removal of Saccharin and its Salts from the list of HW  | The rule removes saccharin and its salts from the lists of hazardous constituents and commercial chemical products which are hazardous wastes when discarded or intended to be discarded. There is no checklist for this rule because it simply removes provisions from the regulations.   | 1/18/2011                       | YES  | Non-HSWA          | Federally projected net reduction in national annual paperwork burden to the affected facilities because of elimination of hazardous waste, and hazardous substance reporting requirements, and reduced waste management costs.  | NA                           | State records indicated that since 2013 only one manifest record for saccharin and its salts (U202) was generated, and in 2016 one out-of-state generator shipped 91 pounds to a WI TSDf.   | No identified WI entities impacted   | No cost increase with implementation                                      |

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| F   | 227                            | Revisions of the treatment Standards for Carbamate Wastes       | 8/12/2011      | YES                            | HSWA     | EPA determined that this action does not impose any new information collection burdens and will not have a significant economic impact on a substantial number of small entities because its merely establishes alternative treatment standards expressed as technologies that may be used to treat the carbamate hazardous waste under the LDR program.<br><b>State information:</b> Since 2013, there is no manifest data showing generator shipments of K156 to K158 hazardous waste for carbamate waste.  | NA                | No identified WI entities managing this waste stream. Already in effect at the federal level.  | Already implemented  | <b>No cost increase with Implementation</b>                      |
| G   | 228                            | HW Technical Corrections and Clarifications                     | 4/13/2012      | YES                            | Non-HSWA | EPA determined that this action does not impose any new information collection burdens and will not have a significant economic impact on a substantial number of small entities  | NA                | Correction of typographical error and rule clarification.  | NA   | <b>No cost increase with Implementation</b>                      |
| H   | 231                            | HW Manifest Rule  | 8/6/14*        | NO                             | Non-HSWA | This action does not impose any new information collection burdens as it only changes the manner in which manifest information will be collected and transmitted. EPA determined that this action will not have a significant economic impact on a substantial number of small entities. Authorized states (such as WI) that currently use information systems to track manifest data will <b>need to modify their information systems</b> in order to receive specific electronic manifest data from the national e-Manifest system. Costs to the department are absorbed into current data management modifications/upgrades.   | All HW Generators | Already implemented in WI and managed at a federal level. WI hazardous waste program already modifying information system.   | NA   | <b>No cost increase with Implementation</b>                      |
| I   | 232                            | Revisions to the Export Provisions of the CRT Rule              | 12/26/2014     | NO                             | HSWA     | EPA prepared an analysis of the potential costs and benefits associated with this action. Annual costs to CRT exporters and EPA for the reporting and recordkeeping requirements are estimated to range from \$9,777 to \$17,362 per year. Additionally, CRT exporters may incur a one-time cost of approximately \$42,904 in the first year following promulgation of the rule to familiarize themselves with the new CRT rule requirements. The small entities directly regulated by this final rule are individual CRT exporters. EPA determined that approximately 152 CRT exporters will experience an impact of less than 0.1 percent of annual sales as a result of annual compliance costs of the rule. | NA                | Review of EPA's export data since 2016 did not show any facilities in Wisconsin that export CRTs. Already implemented at a federal level.  | Already implemented  | <b>No cost increase with Implementation</b>                      |
| J   | 233                            | Revisions to the Definition of Solid Waste                      | 7/13/2015      | NO. Some sections are optional | Non-HSWA | EPA estimates that the rule will result in a future annual costs savings of \$1.0 to \$2.0 million per year. However, because this 2014 DSW rule addresses many of the concerns states raised about the 2008 DSW rule, there is a potential that more states would adopt it, thus increasing the upper bound of annual cost savings to \$17.5 million to \$59 million per year.   | NAICS 32, 33      | NAICS 32, 33 = 14,846 WI facilities/605,257 US facilities = 2.45% of US facilities. WI had not adopted the 2008 rule, so larger possible cost savings estimate is applicable.<br><b>The recycling of hazardous secondary materials is a voluntary program.</b> | EPA estimated savings of \$17.5-59 million/year x 2.45% WI representation yields annual cost savings estimate of \$420,000 to \$1.44 million per year. | <b>Cost Savings potential: \$420,000 - \$1.44 million / year</b> |
| K   | 234                            | Vacatur of the Comparable Fuels Rules and the Gasification Rule | 4/8/2015       | NO                             | Non-HSWA | For this vacated rule, EPA determined that this action is not a "significant regulatory action," does not contain any information collection requirements, and does not significantly or uniquely affect small governments.   | NA                | No WI entities impacted  | No identified WI entities impacted   | <b>No cost increase with Implementation</b>                      |

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| L   | 235<br>Disposal of Coal Combustion Residuals from Electronic Utilities                                   | The EPA is codifying a list of wastes generated primarily from processes that support the combustion of coal or other fossil fuels that when co-disposed with coal combustion residuals are not subject to hazardous waste regulations. This action codifies long-standing Agency guidance and reflects Congressional intent.   | 10/19/2015     | YES                   | Non-HSWA | Federal Register Economic Impact Summary: The exclusion revisions associated with this action remove "uniquely associated wastes" from the definition of hazardous waste if co-disposed with CCRs and managed under the Bevill Exemption. For waste co-disposed with CCR, it is a relaxation and should be considered economic relief from the requirements of hazardous waste management, transport, and disposal.   | NA                       | These uniquely associated wastes are already managed under the Dietrich Letter of 1980 which placed these wastes under the Bevill Exemption. EPA finally codifying the exemption in 2019.  | NA   | No cost increase with Implementation  |
| M   | 236<br>Imports and Exports of Hazardous Waste  | This rule amends existing regulations regarding the export and import of hazardous wastes from and into the United States. EPA is making these changes to provide greater protection to human health and the environment by making existing export and import related requirements more consistent with the current import-export requirements for shipments between members of the Organization for Economic Cooperation and Development (OECD)            | 12/31/2016     | NO                    | HSWA     | EPA estimates that the rule will lead to quantifiable annualized cost savings of \$0.7 million, associated with the relaxation of certain requirements and benefits associated with the electronic submission of notices, annual reports, and other documents. Cost savings to industry represent approximately 66 percent of this total. In addition, the rule would lead to certain benefits that cannot be quantified, related to increased efficiency and convenience of electronic submission, enhanced tracking of hazardous waste transportation recognized trader activities, increased regulatory efficiency, consistency with trade requirements for OECD countries, reduction of risks associated with the treatment and disposal of hazardous wastes, and improved ability to acquire information regarding exports and imports of hazardous waste.   | NA                       | Review of EPA's export and import data since 2016 showed there are 6 facilities that export hazardous waste and 5 facilities that import hazardous waste. Import and Export regulations are federally enforced and in effect in Wisconsin. | 66% of \$0.7 million = \$462,000 minimum savings, nationally. No data available on % WI vs. national import/exporters. However, implementation is federal managed and already implemented. | No cost increase with Implementation  |
| N   | 237<br>Hazardous Waste Generator Rule Improvements   | This rule amends the existing hazardous waste generator regulatory program to improve their usability, address gaps in the existing regulations to strengthen environmental protection, provide greater flexibility for hazardous waste generators to manage their hazardous waste in a cost-effective and protective manner, and make technical corrections to address inadvertent errors and remove obsolete references to programs that no longer exist. | 5/30/2017      | NO*                   | Non-HSWA | EPA estimates a cost savings or benefits for facilities opting to take advantage of two voluntary programs in the rule in combination with the less stringent requirements for SQGs accumulating waste on drip pads or in containment buildings as between \$291,000 and \$504,000 million nationally. Similarly, EPA estimates the future annualized national cost to industry to comply with the requirements of this action at between \$5.9 and \$13.3 million.   | All HW Generators        | WI is 3.5% of the national generator universe.   | Voluntary options provide cost savings of \$291,000-504,000 nationally x 3.5% (WI universe)<br><br>National cost increase estimate of \$5.9 to \$13.3 million x 3.5% (WI universe) =       | Potential Cost Savings estimate for HW generators: \$10,200-\$17,640<br><br>Cost Increase estimate: \$206,500-\$465,500 |
| O   | 238<br>Confidentiality Determinations for Hazardous Waste Export and Import Documents, December 26, 2018 | This rule amends existing regulations regarding the export and import of hazardous wastes from and into the United States.  | 6/26/2018      | NO                    | HSWA     | EPA estimates that the rule will result in cost-savings and greater efficiency for EPA and the regulated community as well as facilitate transparency with respect to the documents that are within the scope of this rulemaking.   | All import/exports of HW | Already in effect in Wisconsin.  | NA   | No cost increase with Implementation  |
| P   | 239<br>Hazardous Waste Electronic Manifest System User Fee Rule, January 3, 2018                         | This rule establishes the methodology used to determine and revise the user fees applicable to the electronic and paper manifests to be submitted to the national electronic manifest system (e-Manifest system)  | 6/30/2018      | NO                    | Non-HSWA | EPA projected an impacted regulated universe that includes approximately 80,000 regulated entities (nationwide), and an equal or greater number of entities handling state-only regulated wastes in at least 45 industries, and is expected to result in a net cost savings for them amounting to \$66 million per year. EPA estimates that these entities currently use between three and five million hazardous waste manifests (EPA Form 8700-22) and continuation sheets (EPA Form 8700-22A) to track RCRA hazardous and state-only regulated wastes from generation sites to off-site receiving facilities. However, the user fee obligations that are the primary focus of this final rule will mostly affect a subset of these regulated entities, particularly, the several hundred commercial RCRA TSDFs nationally, and the corresponding receiving facilities for state-only regulated wastes, under RCRA manifests. They are estimated to accrue to both industrial and state government users of electronic manifests. Over the six-year period of analysis modeled in the RIA, the annualized post-rule costs of manifesting were estimated to be \$172 million. Since the pre-rule cost of manifesting is estimated to be \$238 million, annualized cost | All HW Generators        | Federally managed program so minimal/no increased department cost for implementation; no industry increase with package as it is already in effect in WI. Ave. # manifests generated in WI is 54,000/yr.                                   | Already implemented  | No cost increase with Implementation  |

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| Q   | 240<br>Safe Management of Recalled Airbags, November 30, 2018   | This rule provides a conditional exemption from hazardous waste requirements for entities that remove airbag modules and inflators (i.e. airbag waste) from automobiles. Under this new rule, the entities that generate the airbag waste are "airbag waste handlers" and include automobile dealerships, automotive salvage and scrap yards, independent repair facilities and collision centers. | 11/30/2018     | YES                   | Non-HSWA      | The federal economic impact analysis estimated a total cost savings between \$7.6 million and \$56.9 million (nationwide) for the duration of the Takata recalls, resulting in an estimated annual cost savings of \$1.7 million to \$13.0 million per year. Potentially affected entities may include, but are not limited to: entities that manage airbag waste (i.e., discarded airbag modules and airbag inflators) that are subject to hazardous waste regulations. The dealerships performing the Takata recall work constitute the majority of the facilities that will be impacted by this rule. These dealerships fall under NAICS code 441: Motor Vehicle and Parts Dealers. EPA estimates that about 15,256 dealerships (nationwide) may be affected by this rule. Other potentially affected entities include those in NAICS code 336: Transportation Equipment Manufacturing, and in NAICS code 562: Waste Management and Remediation Services. | NAICS 441, 336, 562   | NAICS 441, 336, 562 = 8614 WI facilities; 428,711 U.S. facilities. Impacted WI facilities = 2% of US facilities                | National cost savings estimate of \$7.6 to \$56.9 million x 2% (WI universe). Estimated a total cost savings to WI industry between \$152,000 to \$1,138,000, resulting in an estimated annual cost savings of \$34,000 to \$260,000 per year. | Cost Savings estimate to impacted industries: \$34,000-\$260,000 / year   |
| R   | 241<br>Management Standards for Hazardous Waste Pharmaceuticals and Amendment to the P075 Listing for Nicotine, December 11, 2018 | This rule establishes cost-saving, streamlined standards for handling hazardous waste pharmaceuticals .  | 8/21/2019      | YES and No            | HSWA/Non-HSWA | EPA estimates the annualized national cost to industry to comply with the requirements is between \$6.59 and \$7.99 million. The streamlined management standards for healthcare facilities and the regulatory relief in regard to FDA approved OTC NRT products (i.e., patches, gums and lozenges) is estimated to result in an annualized cost-savings of between \$19.59 million and \$22.95 million.   | NAICS 4242, 4451, 44611, 452311, 54194, 6211, 6212, 6213, 6214, 6219, 622, 6231, 623311 | NAICS total pharmaceutical/ health care codes represent: 65,622 WI Facilities/3,502,920 US Facilities = 1.87% of US facilities | EPA estimated costs to comply with the requirements: \$6.59 to \$7.99 million x 1.87% (WI percentage of industry)<br><br>EPA estimated savings: \$19.59 million and \$22.95 million x 1.87% (WI percentage of industry)                        | Cost Increase estimate to impacted industries: \$123,000-\$149,000 /year<br><br>Cost Savings estimate to impacted industries: \$366,333 - \$429,165 /year |