Association of State and Territorial
ASTSWMO
Solid Waste Management Officials

Hazardous Waste
Corrective Action and Permitting Task Force

White Paper:

Development and Use of Pricing Factors in Hazardous Waste Program Operations

June 2, 2011
www.astswmo.org

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Introduction

In January 2007, the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Board of Directors released the State RCRA Subtitle C Core Hazardous Waste Management Program Implementation Costs Final Report (2007 Core Report), which examined the "nature and costs of implementing a complete and adequate [RCRA Subtitle C] Program." The Core Report is currently posted on-line at: http://astswmo.org/Files/Policies_and_Publications/Hazardous_Waste/Final%20Report%20-%20RCRA%20Subtitle%20C%20Core%20Project.pdf. The 2007 Core Report concluded that there is a significant gap between current federal funding levels and the actual costs associated with administering adequate state hazardous waste (RCRA-equivalent) programs.

The Report indicated that, while current funding levels from both State and federal resources have either stagnated or declined; expectations for program performance established by EPA and the federal Office Management and Budget (OMB) have increased. Since the time of release of the 2007 Core Report, State hazardous waste program funding situations have continued to worsen while federal expectations, initiatives and unfunded mandates have continued to increase.

A stated purpose of the 2007 Core Report was: ***"…to document the actual costs of implementing a RCRA C Core Program by the States to enable better understanding and communication of resource and funding requirements necessary to maintain an effective RCRA C Core Program."*** The initial efforts to document these costs relied upon ten volunteer States. Volunteer States took varying approaches to data collection and costing of their State-equivalent RCRA Subtitle C programs. Ultimately, sufficient data was collected to facilitate detailed estimates of the costs to administer State hazardous waste programs, much of which is presented and discussed within the 2007 Core Report.

The various authors of the 2007 Core Report intended that the report itself be used as a tool. This tool would provide a basis for, and common understanding of, the resources necessary to

achieve objectives defined by state programs. Recognizing that State program objectives vary, the appendices to the 2007 Core Report included examples, methodology descriptions, and blank worksheets for the express purpose of allowing state programs to tailor estimates of the costs to administer their hazardous waste programs to meet their respective needs.

Utilizing the 2007 Core Report methodologies and compiled information, individual States should be able to prepare defensible, fact-based cost estimates that address the uniqueness of each state's hazardous waste program.

What is a Pricing Factor?

A pricing factor is a numerical expression of the level of human and/or fiscal resources necessary to complete a specific hazardous waste activity. Pricing factors can be expressed in a number of formats, include dollar amounts or, more commonly, full-time equivalents (FTEs). According to the Government Accountability Office (GAO), an FTE refers to the total number of hours worked by employees divided by the number of compensable hours applicable to each fiscal year[1]. For example, a specific project determined to require one full-time employee 40 work hours to complete, can be expressed as 0.02 FTE (40 hours divided by 2080 hours, assuming 2,080 compensated hours per year).

The term "pricing factor" was not explicitly used in the 2007 Core Report. However, the logical outcome of the cost analysis/completion of worksheets in the 2007 Core Report would be "pricing factors" expressed as "low," "average" or "high" estimates for the activities associated with administration of a comprehensive state hazardous waste program. Through use of the State cost analysis methodology presented in the appendices of the 2007 Core Report, States that participated in data collection supporting the 2007 Core Report were able to compare their estimates to summary information and evaluate whether their cost estimates were low, average or high when compared to other state participants. The ability to conduct this type of evaluation is at the heart of the term "Pricing Factor."

By way of example, Table 1, presented in Appendix 1, illustrates a general methodology as to how pricing factors can be used to estimate program administration costs. Activities are broken down qualitatively in line item fashion. This example uses fixed pricing factors in a spreadsheet format, allowing quarterly numeric estimates of program work products to be individually multiplied by the pricing factor, thereby, arriving at an annual cost projection expressed in "workdays." The summation of all program work product projections provides a total cost. Although, Table 1 expresses the pricing factor in "workdays", it could also be expressed as a dollar amount or FTE figure.

Tables 2a through 2f (see Appendix 2) represent a semi-quantitative, flexible methodology used in the development of the pricing factors presented in the 2007 Core Report. Many of the

[1] U.S. Government Accountability Office. A Glossary of Terms Used in the Federal Budget Process (GAO-05-734SP) September, 2005.

program-specific activities are broken down more discretely than in Table 1. Though not broken down further into individual elements in the spreadsheet, a more detailed description of the program activities comprising each category in the cost estimation spreadsheets is provided in the 2007 Core Report. Facility-specific project complexity from simple (low) to moderate (average) to complex (high) can be factored into development of program cost estimates. This methodology also allows for additional State-specific "adjustments" based on other factors/circumstances.

The spreadsheets associated with this methodology can produce a "range" of potential program costs as desired, both for individual items and as a whole. The "average" cost of each item produced using this methodology appears more or less analogous to the estimates produced by the general methodology presented in Table 1. The methodology in Tables 2a through 2f uses flexible pricing factors in a spreadsheet format, allowing annual estimates of program work product costs that, when summed, produces a total annual cost projection range (low, average and high) expressed in "dollars" (See Table 2f). Although Tables 2a through 2f express pricing factors in "dollars", these factors could also be converted and expressed as workdays or FTEs.

Table 3 depicts the results of a costing exercise that breaks program work activities into detailed sub-units to help facilitate an understanding of the elements that underlie development of broader pricing factors. This methodology differs from that represented in Tables 2a through 2f in that it assigns a work time estimate to sub-units rather than narratively describing those sub-units as was done in the 2007 Core Report. The results, in this case, are pricing factors that identify varying degrees of difficulty/work effort associated with program work products. The pricing factors in Table 3 are identified as being either "simple," "complex," or "average." In this case, the outputs are pricing factors expressed as "hours" that could also be converted and expressed as dollars or FTEs.

Development of State-Specific Pricing Factors

Pricing factors are likely to vary from State to State given the wide range of program requirements and varying complexity of hazardous facilities throughout the country. For example, estimated pricing factors may be higher in States with a number of large military bases, large and complex remediation sites or complex/resource-intensive permitted facilities (e.g. chemical weapons incineration, combustion facilities, etc.) since these types of facilities often require greater resources to address when compared to States that have fewer, less complex facilities.

The first step in the development of pricing factors in any situation is to identify the activities conducted by a State's (RCRA-equivalent) hazardous waste program. In developing the 2007 Core Report, ASTSWMO's Corrective Action & Permitting, Enforcement & Compliance Assurance, and Program Operations Task Forces developed Cost Analysis Methodologies (CAM) for five primary elements of state hazardous programs: 1) Permitting, 2) Remediation, 3) Inspection, 4) Enforcement, and 5) Program Administration. The 2007 Core Report describes

the CAM for each of these program elements and includes spreadsheets (see Tables 2a through 2f, presented in Appendix 2) that categorically break down regulatory activities to facilitate cost estimation and development of pricing factors. This is an excellent resource for States considering conducting their own cost-analysis. "Active" versions of the spreadsheets depicted in Tables 2a through 2f are available on ASTSWMO's website for download and use, as described in Appendix 2.

A further benefit to using the pricing factors methodology represented in the 2007 Core Report is that the vast majority of the line items are already tied to EPA-recognized accomplishments and a significant percentage of the items are tracked directly in RCRAInfo. This correlation provides State program implementers with an operational electronic method for preparation of cost estimates while facilitating cross referencing, tracking and integration of program elements and accomplishments with such estimates.

Use of Pricing Factors

A number of States have found pricing factors to be a valuable tool in negotiations with EPA over annual grant commitments and enforcement priorities. Consider, for example, a State with an annual RCRA program budget of $2.5M, 30 FTEs, and a typical RCRA State and Tribal Assistance Grant (STAG) appropriation of $1,875,000. In this case, STAG funds cover 75% of the State costs or, theoretically, provide resources equivalent to 22.5 FTEs available for program activities. Using pricing factors, the recipient State can develop a fair and reasonably accurate work plan comprised of program activities comparable to the federal resources being provided.

Another example of how pricing factors can be applied to program operations is in the context of the federal Government Performance and Results Act (GPRA) requirements. GPRA requires EPA to establish a strategic plan of its activities on a three-year cycle. Since most States are authorized to implement their state-equivalent hazardous waste programs in lieu of EPA, RCRA performance measures established under GPRA requirements essentially operate under the "trickle down" theory (i.e., the obligation to meet the GPRA performance measures strictly-speaking belong to EPA but the States are really doing a majority of the work to facilitate meeting these measures).

There are currently four primary GPRA performance measures for the RCRA program, one in permitting (i.e., updated controls in place) and three in corrective action (i.e., human exposures to contamination controlled, contaminated groundwater migration controlled and final remedy construction (complete)). EPA's FY 2011-2015 Strategic Plan[2] discusses these performance measures and related goals. These goals affect authorized States, typically through annual grant negotiations, annual performance reviews and development of agency priorities. By analyzing the specific activities associated with the GPRA goals (e.g., permit reissuance, Environmental Indicator (EI) evaluations, facility investigations remedy selections, etc.) necessary to move towards achievement of EPA's annual GPRA goals and applying pricing

[2] Document currently available at http://www.epa.gov/cfo/plan/plan.htm .

factors, States can approximate the level of resources necessary to complete the required activities and compare those to available and projected staffing levels to establish whether or not the goals can reasonably be met.

There are many other potential uses of pricing factors by States beyond those associated with EPA grant negotiations and GPRA performance measures targeting. These include, but are by no means limited to: 1) internal planning, budgeting and project prioritization decisions; 2) estimation of cost recovery amounts for various regulated activities in States that have authority to cost recover for those activities; 3) educating program and/or upper level managers, who may not be familiar with day-to-day program operations, regarding the nature, scope and costs of running core State hazardous waste programs; and 4) developing information for State legislatures and other interested parties for use in discussions of whether additional State funding is needed to supplement federal funding.

Conclusions

In a time when State hazardous waste programs are increasingly being asked to do more with less and take on additional unfunded federal mandates, it is important for all stakeholders (i.e., States, EPA, regulated facilities and the public) to have an understanding of the substantial costs associated with operation of adequate Sate hazardous waste programs. Development of pricing factors is a tool that can be used to facilitate this understanding and provide a firm basis of support for all of the uses discussed above.

APPENDIX 1
Table 1 – Pricing Factor Example

	A	B	C	D	E	F	G	H
1	ACTIVITY	1ST QTR	2ND QTR	3RD QTR	4TH QTR	Commitment Total	Commitment Item Pricing Factor (Workdays/Item)	Commitment Item Workdays Total
2	PERMITTING, MODIFICATION, AND CLOSURE ACTIONS							
3	(Quarterly commitments will be the sum total of the following actions taken or activities completed during each quarter).							
4	Part B application review and NOD or compliance action to notify applicant of deficiencies:							
5	*Post-Closure (new/existing/renewals)		1			1	208	208
6	*Land Disposal (new/existing/renewals)					0	203	0
7	*Storage and Treatment (new/existing/renewals)					0	53	0
8	*Incineration and BIF (new/existing/renewals)					0	200	0
9	*Subpart X (OB/OD) (new/existing/renewals)					0	200	0
10	*HSWA Only (renewals)					0	25	0
11	*Emergency Permits					0	2	0
12	Completeness Determinations (permit applications determined complete and technically adequate and ready to proceed with draft permit):							
13	*Post-Closure (new/existing/renewals)	3		1	1	5	21	105
14	*Land Disposal (new/ existing/renewals)					0	21	0
15	*Storage and Treatment (new/existing/renewals)	1				1	21	21
16	*Incineration and BIF (new/existing/renewals)					0	21	0
17	*Subpart X (OB/OD) (new/existing/existing)			1		1	21	21
18	*HSWA Only (renewals)	1				1	21	21
19	*Emergency Permits					0	4	0
20	Public Notices - Draft Permits:							
21	*Post-Closure (new/existing/renewals)	2	1		1	4	28	112
22	*Land Disposal (new/existing/renewals)					0	28	0
23	*Storage and Treatment (new/existing/renewals)	1				1	28	28
24	*Incineration and BIF (new/existing/renewals)					0	28	0
25	*Subpart X (OB/OD) (new/existing/renewals)				1	1	28	28
26	*HSWA Only (renewals)	2	1			3	28	84
27	*Emergency Permits					0	14	0
28	Public Notices - Permit Denials:							
29	*Post-Closure (new/existing/renewals)					0	28	0
30	*Land Disposal (new/existing/renewals)					0	28	0
31	*Storage and Treatment (new/existing/renewals)					0	28	0
32	*Incineration and BIF (new/existing/renewals)					0	28	0
33	*Subpart X (OB/OD) (new/existing/renewals)					0	28	0
34	*HSWA Only (renewals)					0	28	0
35	*Emergency Permits					0	14	0
36	Final Determinations – Permits Issued:							
37	*Post-Closure (new/existing/renewals)		2	1		3	21	63
38	*Land Disposal (new/existing/renewals)					0	21	0
39	*Storage and Treatment (new/existing/renewals)		1			1	21	21
40	*Incineration and BIF (new/existing/renewals)					0	21	0
41	*Subpart X (OB/OD) (new/existing/renewals)					0	21	0
42	*HSWA Only (renewals)		2	1		3	21	63
43	*Emergency Permits					0	5	0
44	Final Determinations - Permits Denied:							
45	*Post-Closure (new/existing/renewals)					0	21	0
46	*Land Disposal (new/existing/renewals)					0	21	0
47	*Storage and Treatment (new/existing/renewals)					0	21	0

Table 1 – Pricing Factor Example (page 2 of 3)

	A	B	C	D	E	F	G	H
48	*Incineration and BIF (new/existing/renewals)					0	21	0
49	*Subpart X (OB/OD) (new/existing/renewals)					0	21	0
50	*HSWA Only (renewals)					0	21	0
51	*Emergency Permits					0	5	0
52	-265 Closure Plan review and NOD or compliance action to notify applicant of deficiencies:							
53	*Land Disposal					0	45	0
54	*Incinerators/BIFs					0	22	0
55	*Storage/Treatment					0	12	0
56	*Equivalency Petitions					0	45	0
57	*Public Notices - Closure Plans:							
58	*Land Disposal	1				1	24	24
59	*Incinerators/BIFs					0	24	0
60	*Storage/Treatment					0	24	0
61	*Equivalency Petitions					0	24	0
62	-Closure Plans Approved:							
63	*Land Disposal		1			1	7	7
64	*Incinerators/BIFs					0	7	0
65	*Storage/Treatment			1		1	7	7
66	*Equivalency Petitions					0	7	0
67	-Closure Certifications:							
68	*Land Disposal	1	2			3	14	42
69	*Incinerators/BIFs					0	14	0
70	*Storage/Treatment				2	2	14	28
71	-Modifications - Public Notices:							
72	*Land Disposal					0	21	0
73	*Post-Closure					0	21	0
74	*Storage/Treatment		3	1		4	21	84
75	*Incinerators/BIFs					0	21	0
76	*HSWA Only					0	21	0
77	-Modifications - Approval:							
78	*Land Disposal					0	14	0
79	*Post-Closure					0	14	0
80	*Storage/Treatment			3		3	14	42
81	*Incinerators/BIFs	1		1		2	14	28
82	*HSWA Only					0	14	0
83	-Modifications - Denial:							
84	*Land Disposal					0	14	0
85	*Post-Closure					0	14	0
86	*Storage/Treatment					0	14	0
87	*Incinerators					0	14	0
88	*HSWA Only					0	14	0
89	Routine Permit Maintenance	Enter total number of Permits at bottom of Table.				46	14	644
90	CORRECTIVE ACTIONS FOR SOLID WASTE MANAGEMENT UNITS							
91	(Quarterly commitments will be the sum total of the following actions taken or activities completed during each quarter).							
92	RCRA Facility Assessment (RFA) completed:							
93	*RFA VSI Conducted (CA011 + **454)	2				2	195	390
94	*RFA VSI Conducted (CA011 + **454) (EPA Contractor)					0	10	0
95	*RFA Report(s) reviewed (CA013)	1		2		3	15	45
96	*RFA Report(s) reviewed (CA013) (EPA Contractor)					0	10	0
97	*RFA Completed for Entire Facility (CA050)	2	2			4	15	60
98	*RFA Completed for Entire Facility (CA050) (EPA Contractor)	1				1	10	10
99	*NCAPS ranking for Facility Completed (CA075)	1	3			4	10	40
100	*NCAPS ranking for Facility Completed (CA075) (EPA Contractor)	2				2	5	10
101	Confirmatory Sampling (CS) Imposed:							
102	*CS Imposed (CA102)					0		0
103	*CS Workplan(s) reviewed (NOD) (CA105)	1				1	29	29
104	*CS Workplan Approved (CA106)	2				2	14	28
105	*CS Report Reviewed (NOD) (CA108)			2		2	46	92
106	*CS Report Approved (CA109)			1	1	2	14	28

Table 1 – Pricing Factor Example (page 3 of 3)

	A	B	C	D	E	F	G	H
107	**RCRA Facility Investigation (RFI) Imposed:**							
108	°RFI Imposed (CA100)					0		0
109	°RFI Workplan(s) reviewed (NOD) (CA140)	1	1			2	58	116
110	°RFI Workplan Approved (CA150)	2			1	3	14	42
111	°RFI Oversight Inspection Conducted (CA152)	3		1		4	2	8
112	°RFI Report(s) reviewed (NOD) (CA186)	3	4	2	1	10	93	930
113	°RFI (Report) Approved (CA200)	2	2	1	4	9	14	126
114	**Environmental Indicators (EI)**							
115	°Environmental Indicator Memo Prepared (CA201+CA725+CA750)				4	4	14	56
116	°Human Exposures Controlled Determination (CA725 YE)				4	4		0
117	°Release to GW Controlled Determination (CA750 YE)				4	4		0
118	**Stabilization / Interim Measures (I M)**							
119	°Stabilization Evaluation (CA225)					0		0
120	°Stabilization Measures Implemented (CA600)					0		0
121	°IM Workplan(s) reviewed (NOD) (CA620)					0	44	0
122	°IM Workplan(s) Approved (CA630)					0	14	0
123	°IM Report(s) reviewed (NOD) (CA645)					0	70	0
124	°IM Report Approved (CA646)					0	14	0
125	°Stabilization / Interim Measures Completed (CA650)					0		0
126	**Corrective Measures Study (CMS) Imposed:**							
127	°CMS Imposed (CA250)	1				1		0
128	°CMS Workplan(s) Reviewed (NOD) (CA270)		1			1	58	58
129	°CMS Workplan(s) Approved (CA300)		1	1		2	14	28
130	°CMS Report(s) Reviewed (NOD) (CA336)				1	1	93	93
131	°CMS (Report) Approved (CA350)					0	14	0
132	**Corrective Measures Implementation (CMI)**							
133	°Permit Mod for CA (Final) Remedy (CA Imposed) (CA400)					0	160	0
134	°CMI Workplan Reviewed (NOD) (CA423)					0	58	0
135	°Corrective Measures Design Approved (CA450)					0	21	0
136	°CMI Workplan Approved (CA500)					0	14	0
137	°Corrective Action Completed (and Certified) (CA550)				1	1	28	28
138								
139	**Total number of permits, etc. issued and in force.**							
140	AHWMMA Operating Permits	10						
141	AHWMMA Post-Closure Permits	25						
142	AHWMMA SWMU Corrective Action Permits	5						
143	AHWMMA Post-Closure/SWMU Corrective Action Orders	6						
144	TOTAL	46						
145								
146		Workdays	Workyears					
147	Permitting Commitment	1681	6.47					
148	Corrective Action Commitment	2217	8.53					
149	Total Commitment	3898	14.99					
150								
151	**Instructions for use: Enter quarterly commitments for permitting, closure and corrective action activites on the appropriate line and in the appropriate column (in unshaded areas) of spreadsheet. Enter total numbers of permits, corrective action orders, etc. in appropriate spaces. Worksheet calculations are automated.**							

APPENDIX 2

Tables 2a – 2f

Cost Analysis Methodology

Data sheets displaying a cost analysis methodology for agency programmatic activities in the areas of remediation, permitting, inspections, enforcement and program administration are presented in the spreadsheet posted on the ASTSWMO web site at http://astswmo.org/Files/Policies_and_Publications/Hazardous_Waste/ASTSWMO_CAP_Task_Force-Tables2a-2f-Pricing_Factors_Example-protected.xls. Note that formula cells in the posted spreadsheet are "protected" to prevent the inadvertent modification of a formula. After downloading the spreadsheet, users may modify the formulas if they wish by selecting "Unprotect sheet" on the "Protection" submenu on the "Tools" menu.

APPENDIX 3

Table 3 – Costing Exercise: Permit Maintenance/Long Term Environmental Stewardship

Table 2

DRAFT Expanded Description of Permit Maintenance/Long Term Environmental Stewardship Activities (Rev 3/3/08)

	Description	Task Explanation DESCRIBE STEPS/TASKS IN ALL CATEGORIES	WLS Hours Simple	WLS Hours Complex	WLS Hours Average	Support Staff Hours (average) GSU	HERD	PP	Compliance	REAS	CLC
2	**Emergency Permits (cont'd)**	Compile administrative record, post on EnviroStor	2.0	4.0	3.0						
		Process confidentiality request, if necessary	1.0	1.0	1.0						2.0
		Process appeal, if necessary		20.0	20.0						
		Receive final report with certification that site has been cleared of HW	0.5	20.0	10.3						
		Total hours	18.5	180.0	109.5		30.0	11.0	14.0	10.0	16.0
3	**Review/Approval of Special Condition Permit Submittals**										
	Performing technical reviews/approvals of technical submittals pursuant to conditions set in permits.	Coordination with facility on technical requirements pertaining to permit conditions. Technical discussions prior to submittal of documents/workplans.	80.0	120.0	100.0						
		Coordination with support staff on implementation/review of draft and final submittals.	20.0	60.0	40.0	15.0	10.0	8.0	15.0	6.0	4.0
		Review/approve draft submittals.	20.0	60.0	40.0						
		Follow-up work to ensure adherence to compliance schedule and implementation schedule in approved technical documents.	20.0	60.0	40.0	10.0	3.0	4.0	6.0	2.0	2.0
		Total hours	140.0	300.0	220.0	25.0	13.0	12.0	21.0	8.0	6.0

DRAFT **Expanded Description of Permit Maintenance/Long Term Environmental Stewardship Activities** (Rev 3/3/08)

	Description	Task Explanation DESCRIBE STEPS/TASKS IN ALL CATEGORIES	WLS Hours Simple	WLS Hours Complex	WLS Hours Average	Support Staff Hours (average) GSU	HERD	PP	Compliance	PEAS	CLC
2	**Emergency Permits**										
	Processing emergency permits and CEQA; follow-up work to ensure actions were implemented per conditions of permit.	Emergency permit request call in/ pre-application assistance - consult with permittee, provide draft emergency permit procedures	1.0	3.0	2.0						6.0
	Note: an example of a simple permit is a tanker truck transfer. An example of a complex permit is the treatment of perchlorate canisters at Aerojet or storage at missile at China Lake.	Advise PP and PEAS of pending submittal so support staff can be assigned	0.5	1.0	0.8			1.0		1.0	
		Emergency permit request received/technical review - review application, determine whether complete, technically accurate	3.0	20.0	11.5		15.0		6.0		
		Request additional information if necessary (NOD)	1.0	20.0	10.5						
		Revisions received/technical review - review	2.0	20.0	11.0		15.0		8.0		
		Determine whether complete/ technically accurate - provide confirmation to permittee	0.5	8.0	4.3						
		Issue verbal (email) permit to facility if warranted	0.5		0.5						
		Contact and coordinate with local and state agencies if necessary	0.5	8.0	4.3						
		Prepare Emergency Permit (letter to facility) and special conditions	1.0	20.0	10.5						8.0
		Prepare CEQA docs	1.0	20.0	10.5					9.0	
		Prepare public notice/supply example to PP	1.0	12.0	6.5			10.0			
		Final Permit Determination - assemble package for Branch Chief's signature	3.0	3.0	3.0						

Table 2

DRAFT Expanded Description of Permit Maintenance/Long Term Environmental Stewardship Activities (Rev 3/3/08)

	Description	Task Explanation DESCRIBE STEPS/TASKS IN ALL CATEGORIES	WLS Hours Simple	WLS Hours Complex	WLS Hours Average	Support Staff Hours (average) GSU	HERD	PP	Compliance	PEAS	OLC
2	**Emergency Permits (cont'd)**	Compile administrative record, post on EnviroStor	2.0	4.0	3.0						
		Process confidentiality request, if necessary	1.0	1.0	1.0						2.0
		Process appeal, if necessary		20.0	20.0						
		Receive final report with certification that site has been cleared of HW	0.5	20.0	10.3						
		Total hours	18.5	180.0	109.5		30.0	11.0	14.0	10.0	16.0
3	**Review/Approval of Special Condition Permit Submittals**										
	Performing technical reviews/approvals of technical submittals pursuant to conditions set in permits.	Coordination with facility on technical requirements pertaining to permit conditions. Technical discussions prior to submittal of documents/workplans.	80.0	120.0	100.0						
		Coordination with support staff on implementation/review of draft and final submittals.	20.0	60.0	40.0	15.0	10.0	8.0	15.0	6.0	4.0
		Review/approve draft submittals.	20.0	60.0	40.0						
		Follow-up work to ensure adherence to compliance schedule and implementation schedule in approved technical documents.	20.0	60.0	40.0	10.0	3.0	4.0	6.0	2.0	2.0
		Total hours	140.0	300.0	220.0	25.0	13.0	12.0	21.0	8.0	6.0