are directly reusable (i.e., do not require treatment prior to reuse, and due to stringent product specifications, do not contain constituents that are not used in the product) they would not be considered a waste, and therefore, would not trigger the 90 day RCRA accumulation limitation on listed or characteristic hazardous wastewaters. Therefore, EPA has revised the cost model so that it no longer costs stored interior equipment cleaning rinsates that have been stored for greater than 90 days for treatment through the UTS. Instead, these reusable rinsewaters are costed for storage only (not RCRA storage costs).

Note: To avoid speculative accumulation, 75% of these directly reusable rinsewaters must be reused within a calendar year.

Estimated annualized compliance costs to achieve zero discharge tend to decrease due to changes in scope, but increase in the aggregate due to the three revisions described in the above discussion as compared to the proposed rule.

Finally, EPA also developed estimated annualized compliance costs and pollutant removals for the pollution prevention alternative. This cost estimate is based on the version of the P2 alternative which would specify the pollution prevention, recycle and reuse practices in the regulatory text of the final rule (see Section III.C). However, it can also be viewed as a conservative estimate for the P2 alternative where water conservation practices are not specified in the regulatory text, but are instead provided as guidance.

The computer model used for estimating costs was altered slightly to estimate costs for the pollution prevention alternative. Capital costs were added to account for equipment (e.g., cost of floor scrubbing machine or other flow reduction devices) needed to perform the specific practices. In reference to this equipment, EPA applied an 80% reduction to floor wash and exterior equipment cleaning volumes. Also, revisions were made to include removing the cost of pretreatment for the wastewater sources that would not require treatment prior to discharge to a POTW (e.g., DOT aerosol test bath water or safety equipment cleaning). [Note: EPA has not estimated costs for direct discharging stand alone PFPR facilities because these facilities are currently considered to be at zero discharge]. Wastewaters that would require treatment prior to discharge under a pollution prevention discharge allowance were costed for treatment through the UTS (including a 0.2% blowdown costed for contract

hauling sludges for incineration). As mentioned above, EPA did not include costs for treating interior equipment cleaning rinsates that are stored for greater than 90 days. In addition, interior equipment cleaning rinsates from lines where detergents were used were costed for treatment and discharge under the P2 discharge allowance. In the cases of indirect dischargers, many facilities benefited from the decrease in the size of the UTS necessary to treat their wastewater remaining after utilizing the specified practices. For the purpose of conducting the economic analysis, including determining the incremental cost-effectiveness (see Section V), EPA revised the costs and loadings of Option 2 (from proposal) to reflect the costs and loadings associated with the pollution prevention alternative. Both the pollution prevention alternative and Option 2 from the proposal are based on pollution prevention with treat and discharge; however, the pollution prevention alternative would only allow reduced discharge and is designed so that it would not have to require numerical limitations for compliance, as did Option 2 in the proposal.

EPA requests comment on the revisions to the costing methodology.

V. Estimated Costs, Economic Impacts, and Cost-Effectiveness

A. Options at Proposal

EPA considered 5 PSES options at proposal. Options 1 and 2 were not zero discharge options but involved treatment of wastewater and discharge to POTWs. Options 3, 4, and 5 were zero discharge options but involved different compliance methods with differing costs and impacts.

Option 1 consisted of end-of-pipe treatment for all wastewaters through the Universal Treatment System (UTS) and discharge to POTWs. Option 1 was rejected because it did not include pollution prevention, did not incorporate the best available technology available and because the Agency would be unable to control the discharge of all pollutants due to a lack of analytical methods for some active ingredients. Option 1 would require significant additional data on a large number of pollutants for which the Agency would have to establish standards and for which facilities would need to monitor. See 59 FR 17875.

Option 2 added pollution prevention by recycling wastewaters from cleaning the interiors of formulating and packaging equipment, and raw material and shipping containers into the product to recover product value in the wastewaters. Other wastewaters were still expected to be treated through the UTS and discharged to POTWs. Option 2 contained pollution prevention provisions but was rejected for the analytical and monitoring reasons stated above, as it still required numerical limitations.

Option 3 employed the same technology and pollution prevention practices as Option 2 but achieved zero discharge of all process wastewater by recycling the wastewater back to the facility after treatment through the UTS. Option 3/S', the proposed option, is a variant on Option 3 which expanded the coverage of the regulation to PAIs not covered by the Section 308 survey and exempted certain waste streams associated with specific sanitizer PAIs from the zero discharge requirement.

Option 4 incorporated the pollution prevention aspects of Options 2 and 3, but instead of treatment, added off-site disposal to an incinerator for the rest of the wastewater. Option 4 was rejected because it relied on transferring wastewater pollutants to another media and resulted in higher costs with no increased benefits.

Option 5 assumed that all wastewater would be disposed of through off-site incineration. Option 5 was rejected because it did not contain any pollution prevention provisions and for the same reasons as Option 4.

A complete discussion of the estimated compliance costs, impacts, and cost-effectiveness at proposal can be found in the *Economic Impact Analysis* of Proposed Effluent Limitations Guidelines and Standards for the Pesticide Formulation, Packaging, and Repackaging Industry (EIA) and the Cost-Effectiveness Analysis Of Proposed Effluent Limitations Guidelines And Standards For The Pesticide Formulating, Packaging, And Repackaging Industry. Both of these documents are available for review in the public docket of this rulemaking.

B. Compliance Costs

For the purposes of economic analysis, EPA re-estimated the annualized compliance costs and economic impacts for two of the regulatory options presented at proposal (Options 1 and 4) to incorporate the changes in scope discussed in this notice. EPA also estimated compliance costs and economic impacts for a new regulatory option referred to as the Zero/P2 Option. The Zero/P2 Option consists of two alternatives. When implemented, facilities would either meet zero discharge limitations, as the proposed rule required, or would be allowed a reduced discharge (P2 allowable discharge) if they met certain pollution prevention and treatment practices. The Zero/P2 Option revises both Options 2 and 3/S' presented at proposal, and incorporates them into one option, allowing industry to choose between these alternatives. The new pollution prevention alternative is different from the old Option 2 in that

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