

TABLE VIII-1.—TOTAL ANNUALIZED FACILITY\* COMPLIANCE COSTS FOR THE OILY WASTES SUBCATEGORY—Continued

[pre-tax, million \$2001]

Subcategory	Final rule
All Categories: Number of Facilities Operating in the Baseline** .....	2,382

\*This table includes facility compliance costs only. Section VIII.I discusses the social costs of the rule. The estimates in this table exclude baseline and regulatory closures.

\*\*This estimate can be found in section VIII.B.

*C. Facility Level Economic Impacts of the Final Rule by Subcategory*

1. Baseline Closure Analysis

Table VIII-2 summarizes the estimated baseline closures for direct dischargers. Based on its evaluation, EPA determined that 3,593 facilities (or 8.2 percent) of the estimated 43,858 discharging facilities are baseline closures. The 3,593 baseline closures include 3,511 indirect dischargers (97.7 percent) and 98 direct dischargers (2.7 percent). The total number of facilities classified as indirect and direct dischargers does not equal the total number of dischargers. Some facilities

operate in more than one subcategory and have an indirect and direct discharging operation within the same facility. The facilities estimated to close in the baseline analysis are at substantial risk of financial failure independent of the regulation. These facilities were excluded from the post-compliance analysis of regulatory impacts. Data on facility start-ups and closures from the Census *Statistics of U.S. Businesses* indicate that between 6 and 12 percent of facilities in the major metal products manufacturing industries close in any given year. Therefore, EPA's analysis of baseline closures is consistent with this data.

TABLE VIII-2.—SUMMARY OF BASELINE CLOSURES

Subcategory	Total number of dischargers	Number of baseline closures	Percent of baseline closures %	Operating in baseline
General Metals .....	11,364	880	7.7	10,484
Metal Finishing Job Shops .....	1,542	50	3.2	1,491
Non-Chromium Anodizer .....	122	29	23.8	93
Oily Wastes .....	29,185	2,409	8.3	26,776
Printed Wiring Boards .....	848	239	28.2	609
Railroad Line Maintenance .....	826	0	0.0	831
Shipbuilding Dry Dock .....	14	0	0.0	14
All Subcategories* .....	43,858	3,593	8.2	40,265

\*Note: The reported total of facilities over all subcategories does not equal the sum of facilities by subcategory because some facilities operate in more than one subcategory and have an indirect and direct discharging operation within the same facility.

2. Facilities Subject to Regulatory Requirements

Of the estimated 40,265 discharging facilities open in the baseline, EPA

estimates that 37,880 facilities (or 94 percent) will not be subject to the rule's requirements due to subcategory exclusions. The subcategory exclusions

exempt 37,652 indirect dischargers in all subcategories and 259 direct dischargers in seven subcategories from the final rule.

TABLE VIII-3.—SUMMARY FACILITIES SUBJECT TO FINAL RULE

Subcategory	Operating in baseline	Number of facilities excluded	Percent of facilities excluded	Number of facilities subject to final rule
General Metals .....	10,484	10,484	100.0	0
Metal Finishing Job Shops .....	1,491	1,491	100.0	0
Non-Chromium Anodizer .....	93	93	100.0	0
Oily Wastes .....	26,776	24,394	91.1	2,382
Printed Wiring Boards .....	609	609	100.0	0
Railroad Line Maintenance .....	829	829	100.0	0
Shipbuilding Dry Dock .....	14	14	100.0	0
All Subcategories* .....	40,265	37,883	94.0	2,382

\*Note: The reported total of facilities over all subcategories does not equal the sum of facilities by subcategory because some facilities operate in more than one subcategory and have an indirect and direct discharging operation within the same facility.

3. Post-Compliance Impact Analysis

EPA estimates that none of the direct discharging facilities operating in the baseline regulation will close as a result of the MP&M rule. With no predicted facility closures, EPA expects no employment losses from the rule. EPA also expects that none of the 2,382 direct discharging facilities operating in the baseline and subject to regulatory

requirements will experience moderate financial impacts due to the rule.

Chapter 5 of the EEBA includes impact analysis results for alternative regulatory options that EPA considered in developing the final rule.

4. Summary of Facility Impacts

Table VIII-4 summarizes the results of the economic impact analysis for the

final rule. EPA estimates that no facilities will close or experience moderate financial impacts. The table presents the annualized compliance cost on both a pre-tax and after-tax basis. The after-tax value represents the cost that privately-owned firms would incur in complying with the regulation because some of the costs are borne by the general tax-paying public through