

SUPPORTING STATEMENT FOR
LANDFILL METHANE OUTREACH PROGRAM
EPA INFORMATION COLLECTION REQUEST NUMBER 1849.05
OMB CONTROL NUMBER 2060-0446

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

This information collection is entitled “Landfill Methane Outreach Program”, ICR number 1849.05, OMB Control Number 2060-0446.

1(b) Short Characterization/Abstract

The Landfill Methane Outreach Program (LMOP), created by EPA as part of the Climate Change Action Plan, is a voluntary program designed to encourage and facilitate the development of environmentally and economically sound landfill gas (LFG) energy projects across the United States in order to reduce methane emissions from landfills. LMOP does this by educating local governments and communities about the benefits of LFG recovery and use; building partnerships between state agencies, industry, energy service providers, local communities, and other stakeholders interested in developing this valuable resource in their community; and providing tools to evaluate LFG energy (LFGE) potential.

To continue to be successful, it is critical that LMOP gather information from its Partners about their activities and how the program can improve its support to them. Additionally, in order for LMOP to improve the data quality in one of its critical program tools, the LMOP Landfill and Landfill Gas Energy Project database, LMOP must gather basic physical and operational data from municipal solid waste (MSW) landfills without LFGE projects. Improving the data quality in this tool will enable LMOP to identify landfills that are good candidates for LFGE projects, improve estimates of methane emissions from landfills, and help LMOP and its Partners prioritize LFGE project development assistance activities.

Partners are entities that have volunteered to participate in LMOP. LMOP classifies these Partners into one of five categories: Community Partners, State Partners, Industry Partners, Energy Partners, and Endorsers. There are three mechanisms for collecting information from the Partners:

- electronic memoranda of understanding (MOU);
- pre-populated Excel spreadsheets; and
- electronic periodic information updates.

In addition to collecting data from its Partners, LMOP has identified approximately 1,000 landfills owned or operated by other organizations that are considered to have LFGE potential. LMOP plans to initiate a one-time effort to update basic landfill physical and operational data for these landfills using a pre-populated Excel spreadsheet.

The LMOP information collection is expected to involve an average of 832 existing Partners and an additional 114 new Partners per year. Additionally there is a planned one-time information collection for 1,000 other landfill owners and operators. The total annual reporting and recordkeeping burden averaged over three years is 5,887 hours and \$344,827.

This ICR provides a comprehensive description of the information collections under LMOP. Sections 1 through 5 of this ICR describe the specific information collections (e.g., from the standpoint of need, use, and respondent activities). In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency under these collections.

2. NEED FOR AND USE OF THIS COLLECTION

2(a) Need/Authority for the Collection

EPA needs to collect the information in the MOU to formally establish participation in LMOP and to obtain general information about new Partners. Additional information collected from certain types of Partners through spreadsheets is needed to allow EPA to track, facilitate, and encourage the implementation of LFGE projects. This information collection will assist LMOP in decreasing methane emissions from landfills, increasing the use of methane as a renewable energy resource, and reducing emissions due to the burning of non-renewable energy resources such as coal and fuel oil.

Participation in LMOP is voluntary. The five categories of participants are:

- Community Partners;
- State Partners;
- Industry Partners (developers and non-developers);
- Energy Partners; and
- Endorsers.

All participants, in completing the MOU, agree to provide EPA with information requested in the MOU and provide contact information for their LMOP coordinator. Industry Developer Partners agree to provide information on LFGE projects with which they have been involved. Community Partners agree to provide information on the progress of implementing LFGE projects at their landfill(s).

Additionally, EPA needs to improve the data quality in one of its critical program tools, the publicly available LMOP Landfill and Landfill Gas Energy Project database. This is the only

known national database of LFGE projects and landfills with potential. Basic physical and operational data for approximately 1,000 (MSW) landfills are either sparsely populated or outdated. Since the inception of LMOP in 1994 there has never been a systematic national outreach to update landfill data. This outreach to landfills within the LMOP Landfill and Landfill Gas Energy Project database tool will serve several functions:

- improve the accuracy of LMOP's responses to inquiries about landfills and LFG energy, in particular to help project developers and the general public identify future opportunities for developing LFGE projects;
- assist LMOP in identifying landfills that are good candidates for LFGE projects, prioritizing resources on the next generation of landfills suitable for LFGE project development, and reaching program goals; and
- provide communities with information they need to assess LFGE potential at their landfills, communicate the benefits of LFG energy, and begin developing LFGE projects.

2(b) Practical Utility/Users of the Data

EPA uses information submitted in the MOU to update its database of LMOP Partners. The database serves as a source of general information and an electronic mailing list. EPA uses information in spreadsheet attachments submitted by Industry Developer Partners and Community Partners to monitor the progress of LFGE projects and identify opportunities for new projects. EPA also uses the data to prepare reports on LFGE projects and the progress of LMOP. EPA uses case studies of successful LFGE projects to demonstrate to existing and potential Partners the cost savings and environmental benefits associated with capturing and using LFG. General information about the Partners, operational and under construction LFGE projects, and landfills that may have potential for developing LFGE projects is also provided on the LMOP Web site, making it available to other LMOP Partners as well as the public. During EPA fiscal year 2007, LMOP processed over 100 data requests from the public that required accessing data in the LMOP Landfill and Landfill Gas Energy Project database.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

For new Partners, the information to be collected has not previously been collected by EPA or any other Federal Agency. For existing Partners with LFGE projects, and outreach to other landfill owner and operator organizations without a LFGE project, some of the information required may be available in the existing LMOP database. To avoid requesting information that has already been collected, spreadsheets sent to existing Partners and other landfill owners and operators will be pre-populated with information from the database. Recipients of the spreadsheets will be asked to review the information provided. Only if the information is incorrect or out of date will the recipients be requested to provide updated or additional information.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on June 3, 2008 (73 FR 31681). The Agency did not receive any comments on this ICR renewal.

3(c) Consultations

In 2000, EPA consulted with fewer than nine Partners regarding the burden of this information collection. The following Partners were contacted to obtain burden estimates of LMOP activities. Since 2000, all of the information collection procedures for LMOP have transitioned to a more efficient, electronic, and when possible, pre-populated format. Thus, the burden and time associated with completing the MOU, updating landfill and LFGE project data, and submitting periodic updates are assumed to be less than were estimated by Partners in 2000.

Table 1: List of Partner Consultations Made in 2000

Partner Type	Contact Person, Company	Phone Number
Community Partner	Jim Mikolaitis, City of Tucson, Arizona, Department of Solid Waste Management	520-791-3175
Industry Partner, developer	Cindy McCoy, President, Natural Power	919-876-6722
Energy Partner, utility	Kevin Watkins, Vice President, Engineering Pacific Northwest Generating Cooperative	503-288-1234
Energy Partner, end user	Gary Faw, Facilities Manager, Ajinimoto USA, Inc.	919-231-0100
State Partner	Alexander DePillis, Renewable Energy Engineer, Wisconsin Energy Bureau	608-266-1067

In 2007, LMOP also contacted fewer than nine Partners on the preferred format for making updates to their LFGE projects and landfills in the future. LMOP provided a choice of using the existing online data update forms used in previous ICRs, or an e-mail with a pre-populated spreadsheet attachment for all of their projects/landfills. All Partners were either indifferent between these two options or preferred the new spreadsheet information collection method to the old online form.

Table 2: List of Partner Consultations Made in 2007

Partner Type	Contact Person, Company	Phone Number
Industry Partner, developer	Jerry Leone, Casella Waste	607-435-9996
Industry Partner, developer	Dawn Semple, Granger Energy	517-371-9722
Industry Partner, developer	David Mauney, CPL Systems	337-269-4699 x1167
Industry Partner, developer	John Bean, G2 Energy	281-222-1037
Community Partner	Megan Miller, Hillsborough County, FL	813-276-2956
Community Partner	Vance Kemler, City of Denton, TX	940-349-8044

In 2008, LMOP also contacted fewer than nine Partners regarding the burden of this information collection, considering the new methodology of collecting landfill and LFGE project data with pre-populated spreadsheets sent via e-mail. The Partners contacted agreed that the estimated burden by Partner type is what they would expect for this effort or the amount they expect is less than the estimate.

Table 3: List of Partner Consultations Made in 2008

Partner Type	Contact Person, Company	Phone Number
Industry Partner, developer	Jerry Leone, Casella Waste	607-435-9996
Industry Partner, developer	David Mauney, CPL Systems	337-278-7899
Community Partner	Megan Miller, Hillsborough County, FL	813-276-2956

3(d) Effects of Less Frequent Collection

The MOU are submitted once by organizations that choose to become Partners of LMOP. To allow EPA to remain current on LFGE projects, Industry Developer and Community Partners directly involved in projects will be asked to update the landfill and LFGE project data spreadsheets annually. All Partners may also update company and contact information periodically. For others that own or operate landfills without a LFGE project, EPA will conduct a one-time information collection effort to update critical landfill data necessary for evaluating future LFGE project potential. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program, facilitate LFGE project implementation, and respond in a timely manner to needs of the Partners.

3(e) General Guidelines

This information collection request was prepared in compliance with OMB's and EPA's guidelines for ICRs.

3(f) Confidentiality

Participation in LMOP is voluntary. Participants are not required to reveal confidential business information. Additionally, participants will be given specific instructions to not provide any information that they consider confidential.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the MOU, pre-populated landfill and LFGE project data spreadsheets, or periodic information updates.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondent NAICS Codes

This information collection will encompass a wide variety of respondents. Community Partners include local agencies and municipalities that own landfills. State agencies involved in energy, air pollution, and solid waste management are represented through State Partners. Industry Partners include engine and turbine manufacturers, engineering firms, construction companies, environmental consultants, and other companies involved in the logistics of developing LFGE projects such as law firms and financing companies. Industry Partners are further divided into two groups: (1) developers are organizations that facilitate, finance, and implement LFGE projects; (2) non-developers are manufacturers or suppliers of equipment or expertise needed to collect and utilize LFG. Energy Partners include utility companies who purchase energy generated from

landfills, power marketers, and direct end users of energy from the landfill. The end user category is potentially the most diverse category. Any facility located near a landfill that utilizes fuel either in manufacturing products or in heating the facility is a potential energy end user. Finally, Endorsers are non-profit organizations coordinating with EPA to publicize and promote the use of LFG among their members or constituents. These include several trade associations representing the solid waste industry, public works, municipalities, and renewable energy. Table 4 provides the North American Industry Classification System (NAICS) code and description for the respondents.

Table 4: Respondents to Information Collection

Partner Type	NAICS Code	NAICS Description
Community Partners and State Partners	924	Public Administration, Administration of Environmental Quality Programs
	924110	Public Administration, Administration of Air and Water Resource and Solid Waste Management Programs
	926130	Public Administration, Regulation and Administration of Communications, Electric, Gas, and Other Utilities
Industry Partners		
Industry Partners	333611	Turbine and Turbine Generator Set Units Manufacturing
	333618	Other Engine Equipment Manufacturing
	541330	Engineering Services
	541620	Environmental Consulting Services
	562212	Administrative and Support and Waste Management and Remediation Services, Solid Waste Landfill
	541110	Offices of Lawyers
	522110	Commercial Banking
	523910	Financial Investments and Related Activities, Miscellaneous Intermediation
Energy Partners		
<i>Direct users^a</i>	611310	Colleges, Universities, and Professional Schools
	325412	Pharmaceutical Preparation Manufacturing
	327121	Brick and Structural Clay Tile Manufacturing
	327310	Cement Manufacturing
	334210	Telephone Apparatus Manufacturing
	334220	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing
	336111	Automobile Manufacturing
	325411	Medicinal and Botanical Manufacturing
	331511	Iron Foundries
	311111	Dog and Cat Food Manufacturing
	311421	Fruit and Vegetable Canning
	311911	Other Food Manufacturing

Partner Type	NAICS Code	NAICS Description
<i>Power marketers and utilities</i>	221122	Electric Power Distribution
	221119	Other Electric Power Generation
Endorsers	813910	Business Associations

^a There is a wide variety of entities that could become direct energy users. Any facility near a landfill that uses fuel is a potential direct user. A subset of the NAICS codes and descriptions from current direct energy users are included in Table 4.

4(b) Information Requested

(i) *Data Items, Including Recordkeeping Requirements*

Information will be collected in MOU, pre-populated electronic spreadsheets, and through periodic updates. The MOU request the following information from all Partners:

- Name of the organization;
- Signature, including electronic signature, of authorized representative with authorized representative’s printed name and the date of the signature;
- Information about the LMOP coordinator including name, title, address, phone number, fax number, and e-mail address;
- Brief description of the organization (except for Endorsers);
- Organization’s Web site address; and
- A camera-ready copy of the organization’s logo or seal.

Pre-populated electronic spreadsheets request Industry Developer Partners and Community Partners to update existing critical LFGE project data necessary for tracking greenhouse gas reductions from LFGE projects, such as project size and start year.

All Partners may provide information through periodic updates. These updates will mainly be changes to contact information for LMOP coordinators and experts, but they can also include providing or updating a brief (optional) description of the organization which LMOP will post on the LMOP Web site to provide publicity and encourage networking among Partners. LMOP may also call a selection of Partners to confirm or update project information that LMOP has received through the media or industry contacts.

The pre-populated electronic spreadsheets sent to other landfill owners/operators without a LFGE project request that landfill owners/operators update information on landfill physical and operational data, waste data, and gas collection system. The data fields requested are limited to fields critical for evaluating a landfill’s LFGE potential and for estimating potential methane

emissions reductions.

Participation in LMOP does not require any records to be kept, although Partners will likely keep file copies of MOU and spreadsheets submitted to EPA.

(ii) Respondent Activities

The respondent activities depend on the aspect of the information collection to which they are responding. In completing the MOU, respondents will:

- review the MOU;
- complete the MOU online or in hardcopy;
- sign and submit the form electronically or in hardcopy to EPA; and
- file a copy of the MOU.

In completing the pre-populated spreadsheets, respondents will:

- review the spreadsheet and instructions;
- gather information;
- complete or update information in the spreadsheet;
- e-mail or mail the spreadsheet to EPA; and
- file a copy of the spreadsheet.

In replying to or initiating an information update, respondents will:

- gather information; and
- provide information via the LMOP Web site, e-mail, or telephone interview.

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Agency activities associated with this information collection depend on the aspect of the information collection that the agency has received. In receiving the MOU, the agency will:

- review the information provided;
- sign the MOU;
- return a copy of the signed MOU to the Partner;
- enter the information into a database; and
- file the MOU.

In requesting and receiving information through a pre-populated spreadsheet, the agency will:

- populate the spreadsheet with landfill and/or project data specific to the Partner or other landfill owners/operators and send the spreadsheet via e-mail when an electronic address is available or via mail when an electronic address is not available;
- review the information provided and follow up if necessary;
- enter information into a database; and
- file the spreadsheet.

In receiving an information update from a Partner, the agency will:

- review the data; and
- revise data in the database based on the update.

In initiating an information update, the agency will:

- call or e-mail the Partner;
- request updated information; and
- revise data in the database based on the updates.

5(b) Collection Methodology and Management

The methods selected for this information collection are chosen based on efficiency and minimization of burden for respondents and EPA. The MOU can be downloaded from the LMOP Web site and returned to EPA either by fax or mail, or submitted electronically. General Partner information will be posted on the LMOP Web site where it can be reviewed for accuracy by the Partner and revised if necessary. Spreadsheets will be e-mailed to all Industry Developer and Community Partners. When an e-mail address is available, spreadsheets will be e-mailed to other landfill owners/operators. To maximize electronic communication, LMOP will spend time reviewing appropriate Web sites for e-mail addresses for other landfill owner/operator contacts. If no e-mail address is available, LMOP will mail a cover letter and pre-populated spreadsheet printout to the other landfill owner/operator and will offer to e-mail an electronic copy of the spreadsheet if the landfill owner/operator sends their e-mail address. The landfill owner/operator can e-mail LMOP with the updates or mail a hardcopy of the completed spreadsheet back to LMOP.

All information received through the spreadsheets (electronically or via hard copy) will be reviewed by EPA before being entered into the Landfill and Landfill Gas Energy Project database.

5(c) Small Entity Flexibility

EPA expects that some LMOP Partners and other landfill owners/operators are small entities. LMOP reviewed company Web sites and organization descriptions when available for all

Energy Partners and a portion of Industry Partners to help determine the companies' small entity status. LMOP determined whether Community Partners are small entities based on the population served by these government agencies as further described below. LMOP assumed for this estimate of small entities that all State Partners, which represent State governments, are not classified as small entities, since each State population is greater than 50,000. LMOP also assumed that all of its Endorsers, which are non-profits, were classified as small entities. For other respondents, LMOP assumed that public sector landfill owners/operators would have the same distribution of small entities as Community Partners, and private sector landfill owners/operators would have the same distribution of small entities as Industry non-developer Partners. As a result of these estimates and assumptions, LMOP estimated the number of small entities affected per year according to the type of respondent, as shown in Table 5. The numbers in Table 5 reflect LMOP's assumption that the distribution of small entities within each new Partner category will be similar to the distribution analyzed for each existing Partner category.

Table 5: Estimate of Small Entities for Each Respondent Category

Respondent Category	New	Existing
State Partners	0	0
Community Partners	1	10
Endorsers	3	26
Energy	2	18
Industry Partner, developers	4	26
Industry Partner, non-developers	11	76
Other (public sector)	0	72
Other (private sector)	0	40
Total	20	258

For Community Partners, which represent local or regional government entities, LMOP reviewed the list of Community Partners and compared it to a table corresponding to 2006 city or county populations¹ in order to determine the small entity status. Approximately nine percent of existing Community Partners were in cities or counties with populations less than 50,000, which is the threshold for small entities within the public administration sector.

The majority of Energy Partners are power providers, marketers, or energy end users. Within the power provider sector, the only small businesses are a number of rural cooperatives that have joined as Partners; the rest of the power providers are utilities or power marketers that are large businesses. Within the energy end-user sector, many of the companies are large corporations such as Wal-Mart, PepsiCo, Ajinomoto, and Nucor Steel, which have a larger energy

¹ <http://www.census.gov/popest/datasets.html>

demand. Approximately seven small businesses, such as Ohio Valley Creative Energy and Novus Energy, have a single facility that uses LFG to meet its energy needs.

Given the large number of Industry Partners, LMOP reviewed Web sites and organization descriptions for 58% of the project developer Partners and 51% of the non-developer Partners. The companies whose Web sites were not reviewed were assumed to contain a similar percentage of small businesses to those reviewed. Within the developer category, a majority of these Partners have a national presence in the LFG industry and are involved in multiple projects, likely meeting the size criteria for large businesses, and thus are not considered small businesses. Seventeen percent of the developers reviewed were classified as a small business. Most of these small businesses serve a small niche market, have an obvious small number of employees, or work within a small service region. The non-developer Industry Partner category includes manufacturers or suppliers of equipment or expertise needed to collect and utilize LFG. Again, a majority of these businesses are large and supply multiple solid waste facilities with the engineering, equipment, or construction services needed to build and maintain a LFGE project or LFG collection system. Based on a review of Web sites, 20% of non-developers were classified as small businesses; these businesses may include smaller local engineering companies, or other niche products that are not needed in all LFGE applications.

EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. Since the previous ICR, LMOP has reduced the number of data fields requested from Industry Developer Partners and Community Partners. Additionally, LMOP no longer requests updates on LFGE project data from Energy Partners. LMOP also polled Partners on the preferred format for making updates to project data, and Partners considered the pre-populated spreadsheet to be more efficient or no less efficient than the old online forms. Participation in LMOP is voluntary. Any small entity that finds the information collection overly burdensome is not required to participate.

5(d) Collection Schedule

EPA will collect general information in the MOU, which are completed and submitted by each Partner upon their agreement to participate in the program. EPA will collect additional information through pre-populated spreadsheets. These spreadsheets will be completed annually by Industry Developer Partners and Community Partners. Information may also be updated periodically at the request of EPA or the Partner. For other landfill owners/operators, EPA will conduct a one-time information collection using pre-populated spreadsheets.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

In order to obtain accurate hourly burden and cost estimates, EPA consulted with fewer than nine Partners regarding burden and cost assumptions in 2000. For this renewal ICR, the hourly burden estimates for Industry Developer Partners, Energy Partners, and Community Partners were decreased because the number of data fields has been reduced and the collection methodology was simplified. Cost estimates were increased to account for an increase in wages and the number of Partners. Attachment A presents the estimated average annual Partner respondent burden and costs during the next 3-year ICR period for each type of Partner. Attachment B presents the estimated first year (and only year) of other owners/operators' respondent burden and costs for information collection activities associated with LMOP. Table 6 presents a summary of the respondent burden.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

For private-sector respondents (Industry and Energy Partners and other privately-owned or operated landfills), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$124.74 for legal staff, \$105.26 for managerial staff, \$78.22 for technical staff, and \$43.51 for clerical staff. Managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Professional, Scientific, and Technical Services (NAICS code 541000). Legal rates were based on lawyers, management wages were based on managers (all other), technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants for May 2006. A June 2007 labor rate for all rates was estimated by applying a 3.5% growth factor from the Employment Cost Index to account for increases in wages from June 2006 to June 2007. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at: <http://www.bls.gov/news.release/eci.t02.htm>.

For public-sector respondents (Community and State Partners, and other publicly-owned or operated landfills), EPA used the same labor rates used for EPA personnel (see Section 6(c)). These rates are comparable to rates provided by a Community Partner in 2000 and using them for all public-sector employees provides consistency.

For non-profit sector respondents (Endorsers), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$113.06 for legal staff, \$85.46 for managerial staff,

\$86.59 for technical staff, and \$42.01 for clerical staff. Managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Business, Professional, Labor, Political, and Similar Organizations (NAICS code 813900). Legal rates were based on lawyers, management wages were based on managers (all other), technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants for May 2006. A June 2007 labor rate for all rates was estimated by applying a 3.5% growth factor from the Employment Cost Index to account for increases in wages from June 2006 to June 2007. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at: <http://www.bls.gov/news.release/eci.t02.htm>.

(ii) Estimating Capital and Operations and Maintenance Costs

Because this information collection requires respondents only to report information that is already available to them, there are no capital costs. EPA does not expect that the operations and maintenance (O&M) costs of this program will be significant. The only O&M costs expected are for postage potentially necessary to mail in the MOU and possibly spreadsheets. A postage cost of \$3.00 is attributed to all activities involving mailing materials to account for the use of trackable mail. It is assumed that all LFGE project data updates from Community and Industry Developer Partners will be submitted electronically, so their only trackable mail costs are associated with submitting their MOU. It is assumed that some of the other landfill owners/operators will submit their one-time only spreadsheet updates by mail.

Table 6: Summary of Respondent Burden

		New	Existing		
Partner		Average Annual Burden		Total for 3-year ICR Period	
Hours	Community	149	668	2,450	
	Endorser	6	10	47	
	Energy and Industry Non-Developer	228	608	2,505	
	Industry Project Developer	456	1,178	4,901	
	State	2	16	54	
	<i>Subtotal Hours</i>	841	2,480	9,957	
	<i>Average Burden per Partner</i>	7.4	3.0	--	
	Other Landfill Owners/Operators¹				
	Public owners and/or operators	1,333	0	4,000	
	Private owners and/or operators	1,233	0	3,700	
	<i>Subtotal Hours</i>	2,566	0	7,700	
	<i>Average Burden per Landfill Owner/Operator</i>	7.7	--	7.7	
	Total Hours	3,407	2,480	17,657	
	Average Burden per Respondent	7.6	3.0	--	
Cost	Partner				
	Community	\$6,913	\$30,381	\$111,881	
	Endorser	\$460	\$844	\$3,913	
	Energy and Industry Non-Developer	\$19,365	\$47,521	\$200,660	
	Industry Project Developer	\$33,856	\$88,927	\$368,348	
	State	\$110	\$770	\$2,640	
	<i>Subtotal Cost</i>	\$60,703	\$168,444	\$687,442	
	<i>Average Cost per Partner</i>	\$532	\$203	--	
	Other Landfill Owners/Operators¹				
	Public owners and/or operators	\$61,203	\$0	\$183,610	
	Private owners and/or operators	\$54,477	\$0	\$163,430	
	<i>Subtotal Cost</i>	\$115,680	\$0	\$347,039	
	<i>Average Cost per Landfill Owner/Operator</i>	\$347	--	\$347	
	Total Cost	\$176,383	\$168,444	\$1,034,482	
Average Labor and O&M Cost per Respondent	\$394	\$203	--		

1 For other landfill owners/operators, burden and costs are only associated with 2008. To get an average annual burden for the 3-year ICR period, the 2008 burden was divided by 3.

6(c) Estimating Agency Burden and Costs

Attachment C presents the estimated Agency burden hours and costs for the information collection activities associated with LMOP. Table 7 presents a summary of the agency burden. EPA estimates an average hourly labor cost (labor plus 60% for overhead) of \$71.34 for managerial staff, \$48.91 for technical staff, and \$19.65 for clerical staff. To derive these estimates, EPA used the “Salary Table 2007 - GS” from the Department of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

- Managerial Staff - GS-15, Step 1
- Technical Staff - GS-12, Step 5
- Clerical Staff - GS-5, Step 1

Table 7: Summary of Agency Burden

	2008	2009	2010	Average	Total
Hours	4,001	1,401	1,551	2,318	6,953
Cost	\$190,352	\$67,485	\$74,822	\$110,886	\$332,658

6(d) Estimating the Respondent Universe

The number of LMOP Partners has grown significantly since the last ICR renewal. Table 8 presents a summary of the respondent universe by LMOP Partner category for the next 3-year ICR period. The burden estimates are based on the total respondent universe. The historical response rates to previous LMOP ICRs are approximately 30%.

Table 8: Summary of LMOP Partners and Other Respondents

Partner	2008		2009		2010		Average	
	Existing	New	Existing	New	Existing	New	Existing	New
Community ¹	108	19	127	19	146	19	127	19
Endorser ²	23	3	26	3	29	3	26	3
Energy ¹	93	14	107	14	121	14	107	14
Industry ¹								
non-developers	323	56	379	56	435	56	379	56
developers	131	21	152	21	173	21	152	21
State ³	40	1	41	1	42	1	41	1
TOTAL	718	114	832	114	946	114	832	114
Other LF Owner/Oper.	0	1,000	0	0	0	0	0	333

1 Staff with experience in managing the LMOP Partner database provided insight on future program growth by Partner category. The number of new Community, Industry, and Energy Partners increased significantly from 2004 to 2005, and again from 2005 to 2006. The number of new Partners anticipated for both 2007 and 2008 is expected to be similar to the number of Partners that joined in 2006. Higher numbers of Partners are expected in the future due to: enhanced media coverage of LFG energy, climate change, and LMOP in recent months, and the benefit of improved LMOP resources for Partners-only such as LFGcost-Web. Additionally, planned outreach to the 1,000 other landfill owners/operators with landfills potentially able to support LFG energy will introduce many communities to LMOP.

2 The number of new Endorsers was assumed to equal an average of the number of Endorsers that joined during the 3-year period from 2004 to 2006.

3 Staff with experience in managing the LMOP Partner database provided insight on future program growth by Partner category. The number of new State Partners is anticipated to be one per year. The majority of states have already joined LMOP and there is not expected to be any significant increase in the growth rate during this 3-year ICR period.

6(e) Bottom Line Burden Hours and Costs

Over the 3-year period covered by this ICR, EPA estimates the respondent burden of the program to be 17,657 hours and \$1,034,482, of which \$4,026 is O&M. EPA estimates the Agency burden to be 6,953 hours and \$332,658. The total annual burden, averaged over the three-year period, is 5,887 hours and \$344,827, of which \$1,342 is O&M for respondents, and 2,318 hours and \$110,886 for EPA.

The total burden for existing Partner respondents will increase gradually over each year of the 3-year ICR period to reflect an increase in the total number of existing Partners, although the burden per respondent will remain constant. The burden and costs shown for each existing Partner category in Attachment A reflect the average number of Partners during the 3-year ICR period. The bottom line burden for new Partners will stay the same for each year of this ICR, since the number of new Partners joining each year is expected to remain relatively constant over the 3-year ICR period. The bottom line burden and costs for other landfill owners/operators will exist only during the first year of this ICR, since this is a one-time information collection effort.

6(f) Reasons for Change in Burden

Under this renewal ICR, the total respondent burden over the 3-year period is 17,657 hours, or an average of 5,887 hours per year. Of this, the total burden on LMOP Partners is 9,957 hours or 3,321 hours per year. The 2004 ICR total burden was 4,598 hours, or an average of 1,533 per year.

Since the last ICR renewal, LMOP no longer collects information annually from Energy, State and non-developer Industry Partners, the information forms have been simplified into pre-populated spreadsheets, and other collection efficiencies have been implemented such as the option to submit MOUs electronically. As a result of these changes, the average number of hours per Partner has decreased, but the total hourly burden for LMOP Partners still increased because of an increase in the number of Partners. For perspective on the magnitude of Partner growth, the number of Partners at the end of 2003 was 365, whereas there were 675 Partners as of July 2007. In addition, 49 new Partners joined LMOP in 2004 while the number of new Partners in 2006 was 117.

The remainder of the increase in total hourly burden is due to the initiative to collect from other landfill owners/operators critical landfill data that are necessary to evaluate the future potential of LFG energy. This type of data collection has not occurred during LMOP's history.

The total cost estimate over the 3-year period for this renewal ICR is \$1,034,482 (\$4,026

is O&M) or an average of \$344,827 per year (\$1342 is O&M). The total cost to LMOP Partners is \$687,442 (\$1,026 is O&M), or \$229,148 (\$342 is O&M) per year. In the previous 2004 ICR renewal, the total cost over the 3-year period was \$268,893. The total cost estimate increase for Partners is due to an increase in the number of Partners and increases in wages. The total cost estimate increase for other landfill owners/operators is due to the planned initiative to collect data from this new group of respondents.

6(g) Burden Statement

The overall annual public reporting and recordkeeping burden for this collection of information is estimated to average 4.6 hours per respondent. The burden per respondent is determined by which types of information collection requests the respondent is affected. The average annual burden for new LMOP Partners is 7.4 hours per respondent, the average annual burden for existing Partners is 3.0 hours per respondent, and the average burden for other landfill owners/operators is a one-time burden of 7.7 hours per respondent..

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, and disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

The average per facility reporting burden for activities associated with completing the MOU is estimated to be 1.8 hours. The burden estimate includes time to review, complete, sign, and submit the MOU.

The average per facility reporting burden for Industry Developer and Community Partner activities associated with completing the pre-populated spreadsheets is estimated to be 8.5 hours. The burden ranges from 4 hours for existing Community Partners to 18.5 hours for new Industry Partners who are developers. The burden estimate includes time to review the spreadsheet and instructions, gather the requested information, complete/update the spreadsheet, and submit the spreadsheet to EPA. The burden for each type of Partner is shown in Attachment A and the total burden is summarized in Table 6.

The average per facility reporting burden for activities associated with periodic information updates is estimated to be 2.5 hours for Energy, Industry, and Community Partners. The average per facility reporting burden for activities associated with periodic information updates is estimated to be 1 hour for State Partners and Endorsers. The burden estimate includes time to gather the requested information and provide the information to EPA.

The average per facility reporting burden for activities associated with completing the other landfill owners/operators' pre-populated spreadsheets is estimated to be 11.75 hours. The burden ranges from 5 hours for public-sector respondents (who likely have only a single landfill) to 18.5 hours for private-sector respondents (who may have to complete information for more than one site).

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a docket for this ICR under Docket ID EPA-HQ-OAR-2003-0078, which is available for online viewing at www.regulations.gov, or in hard copy at EPA Docket, EPA/DC, EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Air and Radiation Docket Center is 202-566-1742.

An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and access those documents in the public docket that are available electronically. In the system, select "search," then key in the Docket ID Number identified above. Alternatively, send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please

include the EPA Docket ID No. EPA-HQ-OAR-2003-0078 and OMB Control Number 2060-0446 in any correspondence.

ATTACHMENT A - ESTIMATED AVERAGE RESPONDENT BURDEN AND COST

A-1 Existing State Partners

A-2 New State Partners

A-3 Existing Endorsers

A-4 New Endorsers

A-5 Existing Energy and Non-Developer Industry Partners

A-6 New Energy and Non-Developer Industry Partners

A-7 Existing Community Partners

A-8 New Community Partners

A-9 Existing Project Developer Industry Partners

A-10 New Project Developer Industry Partners

ATTACHMENT B - ESTIMATED YEAR 1 RESPONDENT BURDEN AND COST:

B-1 Publicly-Owned and/or Operated Landfills with LFGE Potential

B-2 Privately-Owned and/or Operated Landfills with LFGE Potential

ATTACHMENT C - ESTIMATED AGENCY BURDEN AND COST

C-1 Agency Burden 2008

C-2 Agency Burden 2009

C-3 Agency Burden 2010