

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal),
EPA ICR Number 1938.04, OMB Control Number 2060-0505

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste (MSW) Landfills were proposed on November 7, 2000 (65 FR 66672) and promulgated on January 16, 2003 (68 FR 2238). These regulations apply to all landfills at major sources and some landfills at area sources. The only MSW landfill that will be required to apply controls and submit reports by these standards are landfills that: 1) have a design capacity of 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³), and 2) emit equal to or greater than 50 tons per year of nonmethane organic compounds (NMOC) or operate as bioreactors. Landfills of this size and NMOC emission level are currently subject to NMOC control under the Emission Guidelines and New Source Performance Standards (40 CFR part 60, subpart Cc or WWW) for MSW Landfills. Because these standards specifically regulate hazardous air pollutants (HAP), no MSW landfill will be subject to NESHAP unless it meets these emission requirements.

The monitoring, recordkeeping, and reporting requirements outlined in these rules are similar to those required for other NESHAP regulations. Consistent with the NESHAP General Provisions (40 CFR part 63, subpart A), respondents are required to submit initial notifications; conduct performance tests, and submit semiannual reports. They are also required to maintain records of applicability determinations; performance test results; exceedances; periods of startup, shutdown, or malfunction; monitoring records; and all other information needed to determine compliance, and are required of all sources subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

We have determined that there are an estimated 1,119 existing sources currently subject

to this rule and that an estimated one new source each year will become subject to this rule over the next three years of this Information Collection Request (ICR) for an average of 1,121 sources per year.

All of the MSW facilities in the United States are owned and operated by the MSW industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the “Affected Public” is listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of HAP. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from MSW landfills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart AAAA.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the

applicable regulations which were promulgated in accordance with the Clean Air Act. In addition, the collected information is used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart AAAA.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency industry experts have been consulted, and the Agency internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the

collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. We contacted the Waste Business Journal, Mr. James Thompson at (619) 793-5190.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as to those submitted in response to the first Federal Register notice.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of MSW landfills. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for source category description.

Standard (40 CFR, Part 63 Subpart AAAAA)	SIC Codes	NAICS Codes
Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110
Refuse Systems (Solid Waste Landfill)	4953	562212

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by the National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills 40 CFR part 63, subpart AAAAA).

A source must make the following reports:

Notifications	
Notification of startup, shutdown, and malfunction plan	63.5(b), 63.1980(b)
Notification of startup, shutdown, and malfunction plan reports	63.6(e), 63.1980(b)
Semiannual report of deviation	63.105(d)(5) and 63.1965
Semiannual report of compliance	63.1980(f)

A source must keep the following records:

Recordkeeping	
Record of startup, shutdown, and malfunction	63.10(d)(1)
Records are required to be retained for five years	63.10(b)(2)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.

Agency Activities
Audit facility records.
Input, analyze, and maintain data in the OTIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Industry Burden for NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and

major assumptions have been identified. Responses to this information collection are mandatory.

The 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.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 18,234 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are labor costs which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs, such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
N/A	N/A	N/A	N/A	\$15	1,121	\$16,815
					Total	\$16,815

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs including photocopying, and postage are \$16,815. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$17,000 (rounded).

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such as: the examination of records maintained by the respondents; periodic inspection of sources of emissions; and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$777,452 (rounded).

This cost is based on the average hourly labor rate as follows:

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden for NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, approximately 1,119 respondents will be subject to the standard the next three years. It is estimated that one additional source over the three-year period will become subject to the standard. The average number of respondents, as shown in the table below, is 1,121 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	1,119	0	0	1,120
2	1	1,120	0	0	1,121
3	1	1,121	0	0	1,122
Average	1	1,120	0	0	1,121

¹ New respondents include sources with constructed, reconstructed and modified facilities. In this ICR, it also includes a source that would be submitting an application for construction of asbestos waste conversion operations that is denied by the Agency.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 1,121.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses ¹	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Semiannual compliance report	1,121	1	0	1,121
Semiannual SSM report	1,121	2	0	2,242
			Total	3,363

¹ Under the NESHAP rule, semiannual reports are required, since one annual compliance report is already under 40 CFR, subpart Cc or WWW, this rule required that we increase the annual burden by one report instead of two for this subpart.

The number of Total Annual Responses is 3,363.

The total annual labor costs are \$1,472,039. Details regarding these estimates may be found below in Table 1: Annual Industry Burden and Cost - NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63 Subpart AAAA) (Renewal).

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$1,472,039. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Municipal Solid

Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average five hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$17,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 19,177 labor hours at a cost of \$777,452. See below Table 2: Annual Agency Burden and Cost: NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR as compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or nonexistent, so there is no significant change in the overall burden.

It should be noted that there is a change in the labor cost compared to the previous ICR. The change is due to minor calculation error. This ICR reflects the corrections and updates the labor cost figure.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average five hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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 valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

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 public docket for this ICR under Docket ID Number EPA-HQ-OECA-2008-0284. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the

content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0284 and OMB Control Number 2060-0505 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	10	1	10	1	10	0.5	1	\$928.38
B. Required activities								
Prepare SSM plan ^d	40	1	40	1	40	2	4	\$3,713.52
C. Notification requirements								
Deviation of SSM plan ^e	1	2	2	56	112	5.6	11.2	\$10,397.86
D. Write Report								
Semiannual compliance reports ^{f,g}	2	1	2	1,121	2,242	112.1	224.2	\$208,142.80
Semiannual SSM reports ^h	6	2	12	1,121	13,452	672.6	1,345.2	\$1,248,856.78
Subtotal for Reporting Requirements					18,234.4			
Subtotal for Recordkeeping Requirements					0			0
					15,856	792.8	1,585.6	\$1,472,039.34
TOTAL LABOR BURDEN AND COST (rounded)					18,234.4 18,234 (rounded)			\$1,472,039 (rounded)

Assumptions:

^a We have assumed that there are approximately 1,121 existing sources currently subject to this rule. There will be one additional new source that will become subject to the rule each year over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005 “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that it will take 10 hours for a new respondent to read instructions.

^d It will take the respondent 40 hours to prepare the SSM plan.

^e We have assumed that 5 percent of respondents will deviate from the SSM plan.

^f We have assumed that it will take 2 hours for each respondent to complete the semiannual report.

^g Under the NESHAP rule, semiannual compliance reports are required, however, since one annual compliance report is already required under 40 CFR part 60, subpart Cc or WWW, this rule requires that we increase the annual burden by one report instead of two for this subpart.

^h We have assumed that it will take 6 hours for respondents to complete the SSM reports.

Table 2: Average Annual EPA Burden - NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Read instructions	8	1	8	60	480	24	48	\$22,378.08
2. Enter and update information ^c	4	1	4	1	4	0.2	0.4	\$186.48
3. Required activities for sources with add-on control devices								
a. Review operating parameters	See 6							
b. Review continuous parameter monitoring	See 6							
4. Excess emissions report reviews ^{d,e}	8	1.12	8.96	50	448	22.4	44.8	\$20,886.21
5. Review of SSM notification of deviation ^{e,f}	1	1.12	1.12	50	56	2.8	5.6	\$2,610.78
6. Reporting requirements								
a. Review compliance reports ^g	6	22.4	134.4	50	6,720	336	672	\$313,293.12
b. Review SSM plan ^h	8	1	8	1	8	0.4	0.8	\$372.97
c. Review semiannual SSM reports ⁱ	4	44.8	179.2	50	8,960	448	896	\$417,724.16
Subtotals Labor Burden and cost					16,676	833.8	1,667.6	\$777,451.80
TOTAL ANNUAL BURDEN AND COST (rounded)						19,177.4 19,177 (rounded)		\$777,452 (rounded)

Assumptions:

^a We have assumed that there are approximately 1,121 existing sources currently subject to this rule. There will be one additional new source that will become subject to the rule each year over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$56.02 for Managerial (GS-13, Step 5, \$35.01 x 1.6), \$41.57 for Technical (GS-12, Step 1, \$25.98 x 1.6), and \$22.50 Clerical (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

^c We have assumed that one respondent will take 4 hours to enter and update information into agency system.

^d We have assumed that it will take each of the 50 states 8 hours to conduct an excess emission enforcement activity.

^e We have assumed that the average occurrences per agency or state (1.12) is derived from the number of landfills (1,121) subject to the requirements, divided by the

number of states (50) and multiplied by the percentage of sources that are assumed to have excess emissions (0.05). There are no enforcement related activities in ICRs.

^f We have assumed that each of the 50 states will take 1 hour to review the SSM notification.

^g We have assumed that the average occurrences per agency or state (22.4) is derived from the number of landfills (1,121) subject to the requirements, divided by the number of states (50) that must conduct this activity.

^h We have assumed that the one new source will take 8 hours to review the SSM plan.

ⁱ We have assumed that each of the 50 states will take 4 hours twice per year to review the SSM reports.