

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR part 60, subpart Cc and 40 CFR part 62, subpart GGG) (Renewal), EPA ICR Number 1893.05, OMB Control Number 2060-0430.

1(b) Short Characterization/Abstract

The landfills emission guidelines were promulgated on March 12, 1996 and codified at 40 CFR part 60, subpart Cc. The emission guidelines apply to existing municipal solid waste (MSW) landfills that commenced modification or construction before May 30, 1991, have accepted waste at any time since November 8, 1987, and have capacity available for future waste deposition. The emission guidelines apply to existing MSW landfills, including landfills located on Indian land. EPA anticipates that fewer than 12 existing MSW landfills are located in Indian country that are large enough to warrant controls. MSW landfills that were constructed on or after May 30, 1991 or that had changes in design capacities on or after May 30, 1991 are subject to EPA's new source performance standards (NSPS) and not the emission guidelines. This information is being collected to assure compliance with 40 CFR part 60, subpart Cc.

Existing MSW landfills are required to submit reports and maintain records specified in the charts in section 4(b) of this supporting statement. Landfill owners/operators must submit a design capacity report, initial and annual emission rate reports, and collection and control system design plans. Landfill closure and equipment removal reports are required when the landfill closes or the landfill meets the criteria for removing controls. Annual compliance reports must include the following information: descriptions of any period in which the value of any of the monitored operating parameters fell outside the established ranges, and any period when the collection system or air pollution control equipment malfunctioned, or when the collected gas was diverted from the control device.

Landfill owners or operators must keep continuous monitoring records of the parameters reported in the initial performance report; records of monthly monitoring of wellhead temperature, pressure, and nitrogen or oxygen concentration; and records of quarterly monitoring of surface methane concentrations. In addition, owners or operators are required to maintain records of the annual compliance reports, including the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. The notifications, reports, and records are essential in determining compliance, and are required of all MSW landfills subject to the emission guidelines.

The landfills emission guidelines are implemented through either State plans or the Federal plan (40 CFR part 62, subpart GGG) that EPA developed for landfills located in States

and Indian country that did not develop a State or Tribal plan. States directly implement and enforce their State plan. EPA implements and enforces the Federal plan. State plans were due to EPA by December 12, 1996 and the Federal plan was promulgated on November 8, 1999.

Because landfills have been subject to the emission guidelines for several years, either through a State plan or the Federal plan, landfills subject to the emission guidelines have already completed initial notifications and submitted design plans. Since subpart Cc applies to only existing sources and no more sources are expected to trigger the requirements, only the routine reporting and recordkeeping requirements currently apply. Landfills that were required to install collection and control systems must submit annual compliance reports. Any owner or operator subject to the provisions of this part must maintain records for at least 5 years. For landfills subject to a State plan, reports are sent to the State or local authority that developed the State plan. For landfills subject to the Federal plan, reports are sent to the respective EPA regional office. EPA delegated the enforcement authority to the State and local agencies. The information is used to determine that all sources subject to the emission guidelines are achieving the standards.

Approximately 519 MSW landfills are subject to the emission guidelines. No additional sources will become subject to this regulation in the next three years. It is not possible for an additional facility to qualify as an existing source, since it would have to be operational and exceed the design capacity requirements before May 30, 1991.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish procedures by which:

. . . each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant. . . to which a standard of performance would apply, if such existing source were a new source; and (B) provides for the implementation and enforcement of such standards of performance.

In addition, CAA section 114(a)(1) states that:

. . . the Administrator may require any person who owns or operates any emission source or who is 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 or methods; (D) sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Administrator shall prescribe); and (E) provide

other such information as may be reasonably required.

In the Administrator's judgment, emissions from MSW landfills that cause or contribute to air pollution may be reasonably anticipated to endanger public health or welfare. Therefore, emission guidelines were promulgated for the control of existing MSW landfills. Certain reports are necessary to enable the Administrator to identify existing sources subject to the emission guidelines and to determine if the standards are achieved.

2(b) Practical Utility/Users of the Data

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the emission guidelines continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting is necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart Cc, as implemented through State plans and the landfills Federal plan.

3(a) Nonduplication

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 this ICR was published in the Federal Register on September 10, 2008, 73 FR 52652. No comments were received on the burden published in the Federal Register.

3(c) Consultations

It is our policy to review carefully any comment received since the last ICR renewal including those submitted in response to the first federal register notice and respond appropriately. In this case, no comments were received. The Agency's internal industry experts have been consulted. The Agency's internal data sources have also been considered.

The primary source of information was the information provided by the industry.

Information provided in the industry reports is housed in the EPA's AFS (Air Facility Subsystem) database. Approximately 347 respondents are currently subject to the regulation through State plans; 173 respondents are subject to the regulation through the Federal plan. The Agency's information indicates that no new sources will be subject to this standard in the future.

It should be noted that the industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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 were collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease. The emission guideline requirements include a one-time design capacity report and an annual Non-Methane Organic Compound (NMOC) emissions report (for landfills that exceed the design capacity threshold). Landfills that were required to install collection and control systems must perform control device operating parameter monitoring, monthly wellhead monitoring, and quarterly surface monitoring. Quarterly surface monitoring is important in determining that the collection system is working properly.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violates any of the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined to be non-confidential. However, any information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (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 contains sensitive questions. This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Code

The respondents for recordkeeping and reporting requirements are the owners/operators of MSW landfills that are subject to the emission guidelines. The North American Industry Classification System (NAICS) code is 92411 (Air and Water Resource and Solid Waste Management) and 562212 (Refuse Systems, Solid Waste Landfills).

Respondents are also State and local agencies that review reports submitted by landfill owners/operators located in States that have an effective State plan.

4(b) Information Requested

The emission guidelines require affected facilities to maintain all records, including the submitted reports and notifications for at least 5 years. This is consistent with the 40 CFR part 60 General Provisions as applied to the standards. The 5-year records retention requirement is also consistent with the 40 CFR part 70 permit program and the 5-year statute of limitations on which the permit program is based. In addition, the retention of records for 5 years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond 5 years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than 5 years.

(i) Data Items, Including Recordkeeping Requirements

All data in this ICR that are recorded and/or reported are required by the emission guidelines reporting and recordkeeping requirements for existing municipal solid waste landfills, 40 CFR part 60, subpart Cc.

A landfill owner/operator must prepare and submit the following reports:

Notifications and Reports for 40 CFR part 60, subpart Cc	
Initial design capacity report. This requirement no longer applies.	§60.33c(d) §60.757(a) §62.14355(a)(1)
Initial and annual NMOC emission rate reports. These reporting requirements no longer apply.	§60.33c(e)(1)(i) §60.757(b) §62.14355(a)(2)
Collection and control system design plan. This requirement no longer applies.	§60.757(c) §62.14355
Report increments of progress. This requirement no longer applies.	§62.14355(b) and (c)

Notifications and Reports for 40 CFR part 60, subpart Cc	
Annual compliance report	§60.757(f)
Landfill closure report	§60.757(d)
Equipment removal report	§60.757(e)

Landfill owners/operators (respondents) are subject to the emission guidelines as implemented through State plans and the Federal plan. States were required to prepare and submit State plans to EPA by December 12, 1996. States that did not submit an approvable plan are subject to the Federal plan, which was promulgated on November 8, 1999. The deadlines for submitting several reports are tied to EPA's approval date of the State plan or the date of the Federal plan, which have already passed. Therefore, a reporting burden for several reports is not included in this ICR.

Initial design capacity report. The requirement no longer applies. The initial design capacity report was due no later than 90 days after the effective date of EPA approval of the State plan or by 90 days after January 7, 2000 for landfills subject to the Federal plan. All State plans that are expected to be submitted have been submitted. Therefore, a reporting burden is not included in this ICR.

Initial NMOC emission rate report. The requirement to submit an initial NMOC emission rate report no longer applies. The initial NMOC emission rate report was due no later than 90 days after the effective date of EPA approval of the State plan or by 90 days after January 7, 2000 for landfills subject to the Federal plan. Therefore, a reporting burden for the initial NMOC emission rate report is not included in this ICR.

Annual NMOC emission rate report. The majority of State plans became effective in 1998 or 1999 and the Federal plan became effective on January 7, 2000. Some landfills included in the State plans and Federal plan had design capacities ≥ 2.5 million megagrams (Mg) and ≥ 2.5 million cubic meters. This ICR assumes that all existing landfills with design capacities ≥ 2.5 million megagrams (Mg) and ≥ 2.5 million cubic meters have already exceeded the 50 Mg NMOC emission threshold and installed gas collection and control systems so are no longer submitting annual NMOC emission rate reports. Therefore, a reporting burden is not included in this ICR.

Collection and control system design plan. Each owner or operator that must install a gas collection and control system (§60.752(b)(2)(i)) must submit a collection and control system design plan to the Administrator within 1 year of an NMOC emission rate that equals or exceeds 50 Mg per year. This ICR assumes that existing landfills with design capacities ≥ 2.5 million megagrams (Mg) and ≥ 2.5 million cubic meters have already exceeded the 50 Mg NMOC emission threshold and have already submitted the collection and control system design plan. Therefore, this requirement no longer applies.

Increments of progress. Landfill owners/operators were required to submit reports on their progress toward completing the installation of collection and control systems. The deadline

for the requirement has passed. This requirement no longer applies.

Annual compliance report. Landfills that have installed collection and control systems must submit this report, beginning within 180 days of emission collection and control system startup. The report must include the following, among other data items: exceedance of applicable monitoring parameters for the collection system or control device; duration of all periods when the gas stream is diverted from the control device; periods when the control device was not operating for more than 1 hour; periods when the collection system was not operating more than 5 days; and the location of landfill surface emission exceedances.

Landfill closure report. The landfill owner/operator must submit a landfill closure report if the landfill is closed. This ICR assumes that 3 percent of landfills will submit a landfill closure report.

Equipment removal report. The landfill owner/operator is allowed to remove control equipment and must submit an equipment removal report if the landfill is closed, the collection and control system has been in operation a minimum of 15 years, and the calculated NMOC gas produced by the landfill is less than 50 Mg per year on three successive test dates. This ICR assumes that no landfills would submit an equipment removal report. To remove collection and control equipment and submit the removal report, landfills must have had a collection and control system in place for 15 years. No landfills would meet the criteria because 15 years have not passed since the earliest time a landfill would have been required to install gas collection and control equipment by a State plan or the landfills Federal plan.

A landfill owner/operator must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart Cc	
Records of control system monitoring (maintain 5 years)	§60.758(b)
Records of maximum design capacity, refuse-in-place, year-by-year waste acceptance (maintain 5 years)	§60.758(a)
Records of system design and initial performance test/compliance determination (maintain 5 years)	§60.758(b)
Record of a plot map and well locations for the life of the landfill (maintain for life of collection system)	§60.758(d)
Records of collection & control system exceedances, including surface monitoring exceedances (maintain 5 years)	§60.758(c) and (e)

(ii) Respondent Activities – Landfill Owners/operators

Landfill owners/operators will most likely submit hard copy reports, although some may submit electronic versions. The rule allows records to be retained in hard copy or electronic format to allow flexibility and minimize burden.

Currently, respondents use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the landfill site.

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

(iii) Respondent Activities – Implementing Agencies

For landfills covered by a State plan, State and local agencies are the implementing agencies. State and local agencies conduct the same activities as EPA does for landfills subject to the Federal plan, as described in Section 5.

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

5(a) Agency Activities

For landfills covered by the Federal plan, EPA is the implementing agency. EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe performance tests if necessary. This requirement no longer applies.
Review notifications and reports required to be submitted by industry. The annual compliance reports and closure reports are the only types of reports expected to be submitted by respondents and reviewed by EPA during the time period covered by this ICR.
Review surface monitoring methane concentrations.
Audit facility records.
Input, analyze, and maintain data in the Air Facility Subsystem (AFS) database.

5(b) Collection Methodology and Management

As described in Section 4(b), the reporting deadlines for many types of reports required by the emission guidelines have passed and the reports have already been submitted and reviewed. This ICR does not include agency burden for reviewing such reports (initial design capacity report, initial and annual NMOC emission rate reports, collection and control system design plans, increments of progress). This ICR includes the Agency burden for review of those reports (annual compliance report, landfill closure report, equipment removal report) that will be

submitted. EPA and State and local engineers review the submitted information in the reports to determine whether each landfill is in compliance with the rule. Staff review the calculations included in those reports to ensure that landfills used the required methodology and that the NMOC emission rate is correctly calculated. Hard copy reports are kept at EPA regional offices.

Landfill location and design information contained in the reports is entered into AFS, which is operated and maintained by EPA's Office of Air Quality Planning and Standards. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve, and analyze the data.

5(c) Small Entity Flexibility

There are no small businesses affected by this regulation. EPA does not expect that small MSW landfills will be adversely impacted by the emission guidelines. Small landfills were required to submit only a one-time design capacity report. In choosing 2.5 million Mg and 2.5 million cubic meters design capacity as the regulatory cutoff for annual reporting, EPA exempted landfills that are very unlikely to emit 50 Mg or more of NMOC per year (see 61 FR 9918, March 12, 1996). EPA also developed a computer model version of the tiered approach to estimate emissions on the landfills Web site (www.epa.gov/ttn/atw/landfill/landflpg.html) that is available to any owner or operator subject to the emission guidelines. Such tools significantly reduced the burden of the NMOC emission rate calculation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is quarterly. Reporting is done on an annual basis.

6. Estimating the Burden and Cost of the Collection

Tables 1 and 2 document the computation of annual burden for the recordkeeping and reporting requirements applicable to the landfill industry for the emission guidelines. Table 1 documents the burden for private landfills and Table 2 documents the burden for public landfills. The individual burdens are expressed under standardized headings and are believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table, as well as Section 4 of this supporting statement. Responses to this information collection are mandatory.

Table 3 documents the computation of annual burden for State/local agencies that implement and enforce the State plan. The State/local agency burden is expressed under standardized headings, which are believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. Forty (40) State/local agencies will be enforcing State plans that cover 347 landfills affected by State plans. State and local agencies conduct the same activities as EPA

does for landfills subject to the Federal plan, as described in Section 5(a).

The emission guidelines for MSW landfills are estimated to affect 520 landfills. Of those, 172 are affected by the Federal plan and 347 are affected by State plans. This ICR assumes that all 519 landfills have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports. The landfills must submit annual compliance reports and conduct quarterly monitoring for methane emissions from the surface of the landfill.

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 landfill owners/operators for these recordkeeping and reporting requirements is estimated to be 45,397 hours. The average annual burden to State and local agencies that implement and enforce State plans is 749 hours. Therefore, total average annual respondent hours are 46,146. These hours are based on Agency studies and background documents from the development of the regulation, EPA knowledge and experience with the program, and previously approved ICRs for the landfills Federal plan and NESHAP.

6(b) Estimating Respondent Costs

The annual costs to landfill owners/operators is estimated to be \$3,198,318 for labor. The operating and maintenance costs for landfills for the year are estimated to be \$726,600 (519 x \$1,400 per monitor). The annual labor costs to State and local agencies to review reports is \$31,403.

(i) Estimating Labor Costs

For private-sector respondents (privately-owned or operated landfills), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$119.83 for managerial staff, \$86.67 for technical staff, and \$48.47 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). Technical wages were based on environmental engineers and clerical rates were based on executive secretaries and administrative assistants for May 2008 (http://www.bls.gov/oes/2008/may/naics2_54.htm#b17-0000). A March 2009 labor rate for all rates was estimated by applying a 3.2% growth factor from the Employment Cost Index to account for increases in wages from May 2008 to March 2009. 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>. It is estimated that 85 percent of the respondent burden hours is technical; 5 percent management; and 10 percent clerical.

	Managerial	\$119.83 (\$53.58 + 110%)(1.032)
Technical		\$86.67 (\$38.75 + 110%)(1.032)
	Clerical	\$48.47 (\$21.67 + 110%)(1.032)

Using the above labor rates, the average hourly cost is \$80.57 (\$5.99 management; \$73.84 technical; \$4.85 clerical).

For public-sector respondents (publicly-owned or operated landfills), EPA applied the same government employee labor rates as EPA agency staff, which are presented in Section 6(c).

(ii) Estimating Capital and Operation and Maintenance (O&M) Costs

The capital costs are one-times costs when a facility becomes subject to the regulation, such as purchasing a monitor. Since these costs would have been incurred in the first year, there are no capital costs included in this ICR. However, there are operation and maintenance costs associated with the monitor, which are estimated to be \$1,400/monitor/year (\$118/monitor/month). These are recordkeeping costs.

(iii) Capital/Startup Operation and Maintenance Costs

Since all the monitors have been previously purchased, there are no more capital costs associated with this ICR. The operation and maintenance costs for the monitors are estimated to be \$1,400 per monitor/year.

(iv) Annualizing Capital Costs

The only start-up capital costs are the purchase of a portable monitor to monitor methane emissions from the surface of the landfill. This cost has been incurred already and is not included in this ICR. Thus, there are not capital costs to annualize.

6(c) Estimating Agency Burden and Cost

The only costs to EPA are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual EPA cost during the three years of the ICR is estimated to be \$75,193 (see Table 3). This cost is based on the average hourly labor rate for the following GS levels, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of 1,744 hours:

	Managerial	\$59.82 (GS-13, Step 5, \$37.39 x 1.6)
Technical		\$44.38 (GS-12, Step 1, \$27.74 x 1.6)
	Clerical	\$24.02 (GS-6, Step 3, \$15.01 x 1.6)

It is estimated that 85 percent of the agency burden hours is technical; 5 percent management; and 10 percent clerical. Using these rates, it is estimated that the average cost is \$43.12 (\$2.99 management; \$37.73 technical; \$2.40 clerical). These rates are from the Office of Personnel Management (OPM) "Salary Table 2008-GS," which excludes locality rates of pay.

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

The number of respondents is 519 landfill owners/operators and 40 State/local agencies, for a total respondent count of 559. The number of respondents does not vary by year.

The total annual labor hours are 46,146. This is the sum of annual labor hours for private landfill owners/operators (15,045), public landfill owners/operators (30,352), and State/local agencies (749) that implement the emission guidelines. The total annual capital and O&M costs to the 519 landfill owners/operators is \$726,600.

The respondent tables document the following assumptions. This ICR assumes 5 percent of landfills will submit an amended design capacity report per year. This ICR assumes that all landfills affected by a State plan or the Federal plan have already exceeded the 50 Mg/yr NMOC emission threshold and are submitting annual NMOC emission rate reports.

EPA estimates that 67 percent of landfills are public and 33 percent are private. Thus, the count of 172 private landfills includes 57 private landfills subject to the Federal plan and 115 private landfills subject to a State plan. The count of 348 public landfills includes 116 public landfills subject to the Federal plan and 232 public landfills subject to a State plan.

This ICR assumes that 3 percent of landfills will submit a landfill closure report per year and that no landfills would submit an equipment removal report. To remove collection and control equipment and submit the removal report, landfills must have had a collection and control system in place for 15 years. No landfills would meet this criteria because 15 years have not expired since the earliest time a landfill would have been required to install gas collection and control equipment.

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

The bottom line burden hours and cost tables for both the Agency and the respondents appear in the tables attached to this supporting statement.

(i) Respondent Tally

The following table summarizes the respondent tally from Tables 1, 2, and 4.

Entity	Number of respondents	Number of responses per year	Total hours per year	Total annual labor cost	Total annual O&M costs
Private landfills	172	865	15,045	\$1,275,587	\$240,800
Public landfills	347	1745	30,352	\$1,922,731	\$485,800
State/local agencies	40	389	749	\$31,403	0
Total	559	2999	46,146	\$3,229,721	\$726,600

(ii) The Agency Tally

The following table summarizes the Agency tally from Table 4.

Entity	Number of respondents	Number of responses per year	Total hours per year	Total annual labor cost
EPA	1	879	1,744	\$75,193

(iii) Variations in the Annual Bottom Line

The recordkeeping and reporting burden will not vary for the three years.

6(f) Reasons for Change in Burden

This ICR documents the recordkeeping and reporting burden for entities under State plans and the Federal plan. The recordkeeping and reporting burden for entities under the Federal plan was documented in the previous ICR. The burden associated with the Federal plan has not changed, except to update labor rates. This ICR adds the burden imposed by State plans to the burden imposed by the Federal plan. Thus, the number of respondents increases from 173 to 519.

As a result of the increase in respondents to account for State plans, there is also an increase in burden hours from 12,456 to 46,146. There is also an increase in the annual operation and maintenance costs as a result of the increase in respondents to account for State plans. The increase in the annual operation and maintenance cost was from \$242,200 to \$726,600.

6(g) Burden Statement

The annual reporting and recordkeeping burden for this collection of information is estimated to average 15 hours per response. Burden means the total time, effort, or financial

resources expended by persons to generate, maintain, retain, or 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.

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-2009-0536, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket and Information in the EPA Docket Center, EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC. This Docket Facility 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 ECDIC Docket is (202) 566-1514. An electronic version of the public docket is available through 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 to access those documents in the public docket that are available electronically. Once in the system, select "search", then key in the docket ID number identified above. Also, you can 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 Number EPA-HQ-OECA-2009-0536, and OMB control number 2060-0430 in any correspondence.

Part B of the Supporting Statement

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