

**SUPPORTING STATEMENT FOR  
LANDFILL METHANE OUTREACH PROGRAM,  
EPA INFORMATION COLLECTION REQUEST NUMBER 1849.06**

**April 12, 2012**

## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title of the Information Collection**

This renewal information collection is entitled “Landfill Methane Outreach Program”, ICR number 1849.06, 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 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 LFG Energy Project database, LMOP must gather basic physical and operational data from municipal solid waste (MSW) landfills without LFG energy projects. Improving the data quality in this tool will enable LMOP to identify landfills that are good candidates for LFG energy projects, improve estimates of methane emissions from landfills, and help LMOP and its Partners prioritize LFG energy 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.

The LMOP information collection is expected to involve an average of 1,220 existing Partners and an additional 113 new Partners per year. The average annual burden (rounded to one decimal place) and cost per respondent are estimated to be 3.2 hours and \$251. The total annual reporting and recordkeeping burden averaged over three years is 4,215 hours and \$334,298.

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 LFG energy 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 and Energy Partners agree to provide information on LFG energy projects with which they have been involved. Community Partners agree to provide information on the progress of implementing LFG energy projects at their landfill(s).

### **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, Energy, and Community Partners to monitor the progress of LFG energy projects and identify opportunities for new projects. EPA also uses the data to prepare reports on LFG energy projects and the

progress of LMOP. EPA uses case studies of successful LFG energy 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 LFG energy projects, and landfills that may have potential for developing LFG energy projects is also provided on the LMOP website, making it available to other LMOP Partners as well as the public. During EPA fiscal year 2011, LMOP processed approximately 90 data requests from the public that required accessing data in the LMOP Landfill and LFG 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 LFG energy projects, 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 will be pre-populated with information from the LMOP 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.

EPA began annually collecting certain technical and informational data from MSW landfills under the Greenhouse Gas Reporting Program (GHGRP) 40 CFR part 98, subpart HH in 2011. However, the data collected under GHGRP subpart HH are currently very limited in scope and therefore do not overlap to much extent with the data that LMOP collects from its Partners about landfills and LFG energy projects.

#### **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 January 27, 2012 (77 FR 4297). The Agency did not receive any comments on this ICR renewal.

#### **3(c) Consultations**

In 2007, LMOP contacted fewer than nine Partners on the preferred format for making updates to their LFG energy projects and landfills. LMOP provided a choice of using the online data update forms used in ICR 1849.02, or an email 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 1: List of Partner Consultations Made in 2007**

<b>Partner Type</b>	<b>Contact Person, Organization</b>	<b>Phone Number</b>
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 LFG energy project data with pre-populated spreadsheets sent via email. 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 2: List of Partner Consultations Made in 2008**

<b>Partner Type</b>	<b>Contact Person, Organization</b>	<b>Phone Number</b>
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

In 2012, LMOP contacted fewer than nine Partners regarding the burden of this information collection, in regards to the current methodology of collecting landfill and LFG energy project data with pre-populated spreadsheets sent via email. 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 2012**

<b>Partner Type</b>	<b>Contact Person, Organization</b>	<b>Phone Number</b>
Industry Partner, developer	Alan Petersen, INGENCO	804-521-3515
Energy Partner	Nathan Schock, POET	605-965-6428
Community Partner	Billy Malone, DeKalb County Sanitation, GA	404-294-2927

**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 LFG energy projects, Industry Developer, Energy, and Community Partners directly involved in projects will be asked to update the landfill and LFG energy project data spreadsheets annually. All Partners may also update company and contact information periodically. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program, facilitate LFG energy 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 ICR preparation.

**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 LFG energy 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 LFG energy 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 LFG energy 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 direct 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 LFG 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**

<b>Partner Type</b>	<b>NAICS Code</b>	<b>NAICS Description</b>
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	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<sup>a</sup></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

Partner Type	NAICS Code	NAICS Description
	325411	Medicinal and Botanical Manufacturing
	331511	Iron Foundries
	311111	Dog and Cat Food Manufacturing
	311421	Fruit and Vegetable Canning
	311911	Other Food Manufacturing
<i>Power marketers and utilities</i>	221121	Electric Bulk Power Transmission and Control
	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 LFG 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 email address;
- Brief description of the organization;
- Organization's website address; and
- A camera-ready copy of the organization's logo or seal.

Pre-populated electronic spreadsheets request Industry Developer, Energy, and Community Partners to update existing critical LFG energy project data necessary for tracking greenhouse gas reductions from LFG energy 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 description of the organization which LMOP will post on the LMOP website 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.

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 on line 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;
- email 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 website, email, 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 and send the spreadsheet via email;
- 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 email 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 website and returned to EPA either by fax or mail, or submitted electronically. General Partner information will be posted on the LMOP website where it can be reviewed for accuracy by the Partner and revised if necessary. Spreadsheets will be emailed to all Industry Developer, Energy, and Community Partners. All information received through the spreadsheets will be reviewed by EPA before being entered into the Landfill and LFG Energy Project database.

#### **5(c) Small Entity Flexibility**

EPA expects that some LMOP Partners are small entities. LMOP reviewed company websites 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. LMOP conducted a similar review of its Partners' small entity status in 2007 for the previous ICR renewal. The 2007 analysis for small entity status covered all Partners since the program inception through those that joined in September 2007, including many of the industry leaders. The 2012 small entity analysis focused on Partners joining

after September 2007, and included a larger number of start-up companies and small consulting firms that had not previously joined LMOP.

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. To estimate the number of small entities for existing sources, LMOP summed the number of small entities identified in 2007 with the number of small entities identified in 2012 for each Partner category.

For Industry Partners, LMOP’s partnership currently encompasses most of the larger players in the LFG industry, and new private-sector Partners joining LMOP in the future are more likely to be smaller companies. To estimate the number of small entities expected for new Industry Partners, the numbers in Table 5 reflect LMOP’s assumption that the distribution of small entities within each new Industry Partner category (developer and non-developer) will be similar to the distribution analyzed for Partners that joined LMOP between 2007 and 2011. For new Community and Energy Partners, the average percentage of small entities from both the 2007 and 2012 small entity searches are applied, since communities or energy consumers of any size are eligible to sign up as LMOP Community or Energy Partners and LMOP cannot predict what size entities will sign up for the program in the future.

**Table 5: Estimate of Small Entities for Each Respondent Category**

<b>Respondent Category</b>	<b>New</b>	<b>Existing</b>
State Partners	0	0
Community Partners	3	19
Endorsers	9	33
Energy	7	31
Industry Partner, developers	24	87
Industry Partner, non-developers	132	232
Total	175	402

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 2010 city or county populations<sup>1</sup> for Partners joining since September 2007 in order to determine the small entity status. (During the previous ICR renewal, LMOP compared existing Partners to a table corresponding to 2006 city or county populations.) Approximately 16 percent of existing Community Partners are in cities or counties with populations less than 50,000, which is the threshold for small entities within the public administration sector. For solid waste authorities that encompassed more than one jurisdiction, the populations for all member jurisdictions were summed to determine if the entity was small.

<sup>1</sup> <http://quickfacts.census.gov/qfd/index.html>

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 Coca-Cola Refreshments, which have a larger energy demand. Approximately 31 small businesses, such as POET (ethanol plant), State Fair Community College, and Lorton Arts Foundation, have a single facility that uses LFG to meet its energy needs.

Given the large number of existing Industry Partners, LMOP reviewed websites and organization descriptions for 60 percent of the project developer Partners and 51 percent of the non-developer Partners. The companies who provided websites when joining LMOP but whose websites were not reviewed as part of this 2012 analysis were assumed to contain a similar percentage of small businesses as those reviewed. A small portion of Industry Partners did not have websites and most of these were assumed to be small businesses with the exception of a few companies that were known to be large after reviewing the company name.

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. However, the majority of Industry Partners that have joined since 2007 are start-up companies or small consulting firms. Sixty-five percent of the developers who joined since 2007 that had websites reviewed were classified as a small business and most of these small businesses serve a small niche market, have an obviously small number of employees, or work within a small service region. LMOP expects future new project developer Partners are likely to be smaller companies.

The non-developer Industry Partner category includes manufacturers or suppliers of equipment or expertise needed to collect and utilize LFG. 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 an LFG energy project or LFG collection system. Based on a review of websites, 54 percent of non-developers who joined since 2007 were classified as small businesses; these businesses may include smaller local engineering companies or suppliers of niche products that are not needed in all LFG energy applications.

After considering those Partners without websites, 49 percent of the existing project developer Partners and 45 percent of the existing non-developer Partners were considered to be

small businesses.

EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. 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, Energy, and Community Partners. Information may also be updated periodically at the request of EPA or the Partner.

**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 2007, 2008, and 2012. For this renewal ICR, cost estimates were increased to account for an increase in wages and the number of Partners. The hourly burden estimates for Industry Developer and Community Partners remained the same as in the 2008 renewal because the data collection methodology and number of data fields is the same as in the 2008 renewal. The hourly burden estimates for Energy Partners were increased as Energy Partners will be requested to provide updates for LFG energy projects with which they are involved in the ICR going forward. Attachment A presents the estimated average annual Partner respondent burden and costs during the next 3-year ICR period for each type of Partner. 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), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$126.66 for legal staff, \$119.13 for managerial staff, \$87.59 for technical staff, and \$49.80 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 2010. A June 2011 labor rate for all rates was estimated by applying a 1.9% growth factor from the Employment Cost Index to account for increases in wages from June 2010 to June 2011. 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), 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 \$97.99 for managerial staff, \$79.15 for technical staff, and \$47.16 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). 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 2010. A June 2011 labor rate for all rates was estimated by applying a 1.9% growth factor from the Employment Cost Index to account for increases in wages from June 2010 to June 2011. 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 the majority of LMOP Partners (approximately 90 percent) submit MOU electronically. 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 LFG energy project data updates from Industry Developer, Energy, and Community Partners will be submitted electronically, so their only trackable mail costs are associated with submitting their MOU. The average annual O&M cost over three years is \$34.

**Table 6: Summary of Respondent Burden**

		New	Existing	
Partner		Average Annual Burden		Total for 3-year ICR Period
Hours	Community	56	714	2,309
	Endorser	6	15	63
	Industry Non-Developer	267	930	3,590
	Energy and Industry-Project Developer	195	2,015	6,630
	State	2	16	54
	<b>Total Hours</b>	<b>526</b>	<b>3,690</b>	<b>12,645</b>
	<b>Average Burden per Partner</b>	<b>4.6</b>	<b>3.0</b>	<b>--</b>
Cost	Community	\$2,766	\$34,761	\$112,582
	Endorser	\$464	\$1,187	\$4,955
	Industry Non-Developer	\$24,934	\$81,455	\$319,166
	Energy and Industry Project Developer	\$17,027	\$170,761	\$563,364
	State	\$117	\$825	\$2,826
	<b>Total Cost</b>	<b>\$45,309</b>	<b>\$288,989</b>	<b>\$1,002,893</b>
	<b>Average Cost per Partner</b>	<b>\$401</b>	<b>\$237</b>	<b>--</b>

### 6(c) Estimating Agency Burden and Costs

Attachment B 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 \$76.38 for managerial staff, \$52.37 for technical staff, and \$21.02 for clerical staff. To derive these estimates, EPA used the “Salary Table 2011 - GS” from the Department of Personnel Management, available at [http://www.opm.gov/oca/11tables/pdf/gs\\_h.pdf](http://www.opm.gov/oca/11tables/pdf/gs_h.pdf). 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**

	2012	2013	2014	Average	Total
Hours	1,715	1,832	1,949	1,832	<b>5,495</b>
Cost	\$88,706	\$94,846	\$100,947	\$94,833	<b>\$284,498</b>

### 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 25%.

**Table 8: Summary of LMOP Partners and Other Respondents**

Partner <sup>1</sup>	2012		2013		2014		Average	
	Existing	New	Existing	New	Existing	New	Existing	New
Community	129	7	136	7	143	7	136	7
Endorser	36	3	39	3	42	3	39	3
Energy	120	8	128	8	136	8	128	8
Industry								
Non-Developer	662	82	744	82	826	82	744	82
Project Developer	120	12	132	12	144	12	132	12
State	40	1	41	1	42	1	41	1
<b>TOTAL</b>	<b>1,107</b>	<b>113</b>	<b>1,220</b>	<b>113</b>	<b>1,333</b>	<b>113</b>	<b>1,220</b>	<b>113</b>

<sup>1</sup> Staff with experience in managing the LMOP Partner database provided insight on future program growth by Partner category. The number of new Partners each year for each Partner type is expected to equal the average of the number of Partners for each type that joined the program during the 5-year period from 2007 through 2011.

#### **6(e) Bottom Line Burden Hours and Costs**

Over the 3-year period covered by this ICR, EPA estimates the total respondent burden of the program to be 12,645 hours and \$1,002,893, plus \$102 in O&M. EPA estimates the total Agency burden to be 5,495 hours and \$284,498. The annual respondent burden, averaged over the three-year period, is 4,216 hours and \$334,298, plus \$34 in O&M, and the annual Agency burden, averaged over the three-year period, is 1,832 hours and \$94,833.

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.



#### **6(f) Reasons for Change in Burden**

Under this renewal ICR, the total respondent burden over the 3-year period is 12,645 hours, or an average of 4,216 hours per year. The 2008 ICR total respondent burden was 17,656 hours, or an average of 5,887 hours per year.

A significant reason for the decrease in total hourly burden is that under the last ICR renewal, LMOP made provisions for a one-time effort to collect critical landfill data from other landfill owners/operators, and this initiative is not included in this current ICR renewal.

To a lesser magnitude than the decrease discussed above, there is an increase in total hourly burden for Partners as LMOP will now collect landfill/project data from Energy Partners, and also due to an increase in the number of Partners in all Partner categories. For perspective on the magnitude of Partner growth, the number of Partners at the end of 2007 was 719, whereas there were 994 Partners as of September 2011.

#### **6(g) Burden Statement**

The overall annual public reporting and recordkeeping burden for this collection of information is estimated to average 3 hours. 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.

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 EPA-HQ-OAR-2003-0078, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket in the EPA Docket Center (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 is 202-566-1742.

An electronic version of the public docket is available at [www.regulations.gov](http://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 Industry Non-Developer Partners

A-6 New Industry Non-Developer Partners

A-7 Existing Community Partners

A-8 New Community Partners

A-9 Existing Energy and Industry-Project Developer Partners

A-10 New Energy and Industry-Project Developer Partners

**ATTACHMENT B - ESTIMATED AGENCY BURDEN AND COST**

B-1 Agency Burden 2012

B-2 Agency Burden 2013

B-3 Agency Burden 2014