

Table 1.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Municipal Solid Waste Landfills - Subpart XXX - Year 1, Proposed Option 2.5/40

Burden Item	(A) Respondent Hours per Occurrence ^a	(B) Annual Non-Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$48.69	(H) Technical Hours per Year @ \$84.95 (E X F)	(I) Clerical Hours per Year @ \$29.55 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Non-Labor Capital Costs Per Year (Bx Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na														
2. Surveys and Studies	na														
3. Reporting Requirements															
A. Read and Understand Rule Requirements	40	\$0	1	0	40	7	0	280	28	14	\$26,144	\$0	0		d
B. Required Activities															
1. Initial performance test report	12	\$1,105	1	0	12	0	0	0	0	0	\$0	\$0	0	10,067	e, f
2. Surface methane monitoring quarterly	17	\$375	4	68	0	0	0	0	0	0	\$0	\$0	0		a, f, g
C. Create Information	Included in 3B														
D. Gather Information	Included in 3B														
E. Report Preparation															
1. Initial design capacity report	2	\$0	1	0	2	2	0	4	0	0	\$373	\$0	2		h
2. Report of NMOC rate (Tier 1)	8	\$0	1	0	8	4	0	28	3	1	\$2,614	\$0	4		i
3. Report of NMOC rate (Tier 2)	12	\$2,455	1	0	12	4	0	42	4	2	\$3,922	\$8,593	4	10,067	i, j
4. Landfill Closure Report	1	\$0	1	0	1	0	0	0	0	0	\$0	\$0	0		k
5. Equipment Removal Report	36	\$0	1	0	36	0	0	0	0	0	\$0	\$0	0		k, l
6. Collection and Control System Design Plan	80	\$0	1	0	80	0	0	0	0	0	\$0	\$0	0		f
7. Initial Performance Test	Included in 3B														
8. Compliance Report	Included in 3B														
9. Annual Report	8	\$0	1	0	8	0	0	0	0	0	\$0	\$0	0		f, m
<i>Reporting Subtotal</i>							0	354	35	18	\$33,053	\$8,593	9	\$20,134	
4. Recordkeeping Requirements															
A. Read Instructions	Included in 3a														
B. Plan Activities	na														
C. Implement Activities	na														
D. Develop Record System	na														
E. Record Information															
1. Records of control system monitoring	0.5	\$0	12	0	6	0	0	0	0	0	\$0	\$0	0		f
2. Records of site-specific documentation	8	\$0	1	0	8	7	0	56	6	3	\$5,229	\$0	0		f, n
E. Personnel Training	na														
F. Time for Audits	na														
<i>Recordkeeping Subtotal</i>							0	56	6	3	\$5,229	\$0	0	\$0	
Totals							0	410	41	21	\$38,282	\$8,593	9	\$20,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2012, "National Occupational Employment and Wage Estimates United States": Civil Engineer for Managerial labor; Civil Engineering Technician for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device.
- f Assumes no controlled landfill during this ICR period.
- g The average acreage of controlled sites is estimated to be 67 acres under the proposed 2.5/40 option. We assumed daily equipment rental costs at \$125/day and 3 days per occurrence.
- h We have assumed that 2 landfills will have a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report. In the first year of this ICR.
- i We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports.
- j Based on the annualized labor and capital costs for method 25 or 25C over 5 years, since a Tier 2 test must be repeated every 5 years.
- k We have assumed that no controlled landfill will close or remove equipment during this ICR period.
- l Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- m We have assumed that each controlled landfill will take eight hours once per year to write the annual report.
- n Number of occurrences is based on the total number of landfills that are subject to the standard based on design capacity.

Table 1.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Municipal Solid Waste Landfills - Subpart XXX - Year 2, Proposed Option 2.5/40

Burden Item	(A) Respondent Hours per Occurrence ^a	(B) Annual Non- Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$48.69	(H) Technical Hours per Year @ \$84.95 (E X F)	(I) Clerical Hours per Year @ \$29.55 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Non- Labor Capital Costs Per Year (Bx Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
1. Applications	na														
2. Surveys and Studies	na														
3. Reporting Requirements															
A. Read and Understand Rule Requirements	40	\$0	1	0	40	2	0	80	8	4	\$7,470	\$0	0		d
B. Required Activities															
1. Initial performance test report	12	\$1,105	1	0	12	0	0	0	0	0	\$0	\$0	0	10,067	e, f
2. Surface methane monitoring quarterly	17	\$375	4	68	0	0	0	0	0	0	\$0	\$0	0		a, f, g
C. Create Information	Included in 3B														
D. Gather Information	Included in 3B														
E. Report Preparation															
1. Initial design capacity report	2	\$0	1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Report of NMOC rate (Tier 1)	8	\$0	1	0	8	5	0	36	4	2	\$3,361	\$0	5		i
3. Report of NMOC rate (Tier 2)	12	\$2,455	1	0	12	1	0	12	1	1	\$1,120	\$2,455	1	10,067	i, j
4. Landfill Closure Report	1	\$0	1	0	1	0	0	0	0	0	\$0	\$0	0		k
5. Equipment Removal Report	36	\$0	1	0	36	0	0	0	0	0	\$0	\$0	0		k, l
6. Collection and Control System Design Plan	80	\$0	1	0	80	0	0	0	0	0	\$0	\$0	0		f
7. Initial Performance Test	Included in 3B														
8. Compliance Report	Included in 3B														
9. Annual Report	8	\$0	1	0	8	0	0	0	0	0	\$0	\$0	0		f, m
<i>Reporting Subtotal</i>							0	128	13	6	\$11,952	\$2,455	6	\$20,134	
4. Recordkeeping Requirements															
A. Read Instructions	Included in 3a														
B. Plan Activities	na														
C. Implement Activities	na														
D. Develop Record System	na														
E. Record Information															
1. Records of control system monitoring	0.5	\$0	12	0	6	0	0	0	0	0	\$0	\$0	0		f
2. Records of site-specific documentation	8	\$0	1	0	8	9	0	72	7	4	\$6,723	\$0	0		f, n
E. Personnel Training	na														
F. Time for Audits	na														
<i>Recordkeeping Subtotal</i>							0	72	7	4	\$6,723	\$0	0	\$0	
Totals							0	200	20	10	\$18,674	\$2,455	6	\$20,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2012, "National Occupational Employment and Wage Estimates United States": Civil Engineer for Managerial labor; Civil Engineering Technician for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device.
- f Assumes no controlled landfill during this ICR period.
- g The average acreage of controlled sites is estimated to be 67 acres under the proposed 2.5/40 option. We assumed daily equipment rental costs at \$125/day and 3 days per occurrence.
- h We have assumed that 2 landfills will have a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report. In the first year of this ICR.
- i We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports.
- j Based on the annualized labor and capital costs for method 25 or 25C over 5 years, since a Tier 2 test must be repeated every 5 years.
- k We have assumed that no controlled landfill will close or remove equipment during this ICR period.
- l Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- m We have assumed that each controlled landfill will take eight hours once per year to write the annual report.
- n Number of occurrences is based on the total number of landfills that are subject to the standard based on design capacity.

Table 1.C. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Municipal Solid Waste Landfills - Subpart XXX - Year 3, Proposed Option 2.5/40

Burden Item	(A) Respondent Hours per Occurrence ^a	(B) Annual Non-Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$48.69	(H) Technical Hours per Year @ \$84.95 (E X F)	(I) Clerical Hours per Year @ \$29.55 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Non-Labor Capital Costs Per Year (Bx Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na														
2. Surveys and Studies	na														
3. Reporting Requirements															
A. Read and Understand Rule Requirements	40	\$0	1	0	40	6	0	240	24	12	\$22,409	\$0	0		d
B. Required Activities															
1. Initial performance test report	12	\$1,105	1	0	12	0	0	0	0	0	\$0	\$0	0	10,067	e, f
2. Surface methane monitoring quarterly	17	\$375	4	68	0	0	0	0	0	0	\$0	\$0	0		a, f, g
C. Create Information	Included in 3B														
D. Gather Information	Included in 3B														
E. Report Preparation															
1. Initial design capacity report	2	\$0	1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Report of NMOC rate (Tier 1)	8	\$0	1	0	8	8	0	60	6	3	\$5,602	\$0	8		i
3. Report of NMOC rate (Tier 2)	12	\$2,455	1	0	12	3	0	36	4	2	\$3,361	\$7,366	3	10,067	i, j
4. Landfill Closure Report	1	\$0	1	0	1	0	0	0	0	0	\$0	\$0	0		k
5. Equipment Removal Report	36	\$0	1	0	36	0	0	0	0	0	\$0	\$0	0		k, l
6. Collection and Control System Design Plan	80	\$0	1	0	80	0	0	0	0	0	\$0	\$0	0		f
7. Initial Performance Test	Included in 3B														
8. Compliance Report	Included in 3B														
9. Annual Report	8	\$0	1	0	8	0	0	0	0	0	\$0	\$0	0		f, m
<i>Reporting Subtotal</i>							0	336	34	17	\$31,373	\$7,366	11	\$20,134	
4. Recordkeeping Requirements															
A. Read Instructions	Included in 3a														
B. Plan Activities	na														
C. Implement Activities	na														
D. Develop Record System	na														
E. Record Information															
1. Records of control system monitoring	0.5	\$0	12	0	6	0	0	0	0	0	\$0	\$0	0		f
2. Records of site-specific documentation	8	\$0	1	0	8	15	0	120	12	6	\$11,205	\$0	0		f, o
E. Personnel Training	na														
F. Time for Audits	na														
<i>Recordkeeping Subtotal</i>							0	120	12	6	\$11,205	\$0	0	\$0	
Totals							0	456	46	23	\$42,577	\$7,366	11	\$20,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2012, "National Occupational Employment and Wage Estimates United States": Civil Engineer for Managerial labor; Civil Engineering Technician for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device.
- f Assumes no controlled landfill during this ICR period.
- g The average acreage of controlled sites is estimated to be 67 acres under the proposed 2.5/40 option. We assumed daily equipment rental costs at \$125/day and 3 days per occurrence.
- h We have assumed that 2 landfills will have a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report. In the first year of this ICR.
- i We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports.
- j Based on the annualized labor and capital costs for method 25 or 25C over 5 years, since a Tier 2 test must be repeated every 5 years.
- k We have assumed that no controlled landfill will close or remove equipment during this ICR period.
- l Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- m We have assumed that each controlled landfill will take eight hours once per year to write the annual report.
- n Number of occurrences is based on the total number of landfills that are subject to the standard based on design capacity.

**Table 3.A. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 1**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes
1. Read and understand rule requirements	40	60	2,400	2,400	120	240	\$125,620	a
2. Enter and update information into agency recordkeeping system	2	9	18	18	1	2	\$942	b
3. Required activities								
A. Observe initial performance test	12	0	0	0	0	0	\$0	c
B. Observe surface methane monitoring quarterly	20	0	0	0	0	0	\$0	c
C. Review operating parameters	1	0	0	0	0	0	\$0	d
D. Review continuous parameter monitoring	1	0	0	0	0	0	\$0	d
E. Review notification of performance test	2	0	0	0	0	0	\$0	d
4. Excess Emissions Enforcement Activities	24	0	0	0	0	0	\$0	e
5. Notification requirements								
A. Review Notification of Modification	2	0	0	0	0	0	\$0	f
6. Reporting requirements								
A. Review initial design capacity report	1	2	2	2	0	0	\$105	g
B. Review annual NMOC emission rate report	2	7	14	14	1	1	\$733	h
C. Review landfill closure report	1	0	0	0	0	0	\$0	i
D. Review equipment removal report	1	0	0	0	0	0	\$0	i
E. Review Collection and Control System Design Plan	15	0	0	0	0	0	\$0	d
F. Review Revised Collection and Control System Design Plan	5	0	0	0	0	0	\$0	j
G. Review Initial Performance Test	12	0	0	0	0	0	\$0	d
H. Review Compliance Report	2	0	0	0	0	0	\$0	d
I. Review Annual Report	2	0	0	0	0	0	\$0	d
J. Review request for alternative timeline corrections	5	0	0	0	0	0	\$0	d
7. Travel Expenses for Tests Attended	3 days * (\$113 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1113 per trip						\$0	i
TOTAL BURDEN AND COST (SALARY)				2,434	122	243	\$127,399	
TOTAL ANNUAL HOURS						2,799		

a Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$375 per occurrence based on the size of the landfills expected to install controls beginning in year 2020. However, none of the landfills will conduct surface emission monitoring during this first 3-year period.

d Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period.

e Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

f Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period thus no landfills will have modifications.

g Number of occurrences are based on 2 estimated landfills expected to come online by 2015 and having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. No amended design capacity reports are expected in the first three years of this ICR since landfills will be recently opened and not yet applying for any expansions.

h Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

i We have assumed that no controlled landfill will close or remove equipment during this ICR period.

j Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.767(h).

k These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

l Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1113 per trip. The source for hotel and meals/incidental costs is based on FY' 14 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

**Table 3.B. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 2**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes
1. Read and understand rule requirements	40	60	2,400	2,400	120	240	\$125,620	a
2. Enter and update information into agency recordkeeping system	2	9	18	18	1	2	\$942	b
3. Required activities								
A. Observe initial performance test	12	0	0	0	0	0	\$0	c
B. Observe surface methane monitoring quarterly	20	0	0	0	0	0	\$0	c
C. Review operating parameters	1	0	0	0	0	0	\$0	d
D. Review continuous parameter monitoring	1	0	0	0	0	0	\$0	d
E. Review notification of performance test	2	0	0	0	0	0	\$0	d
4. Excess Emissions Enforcement Activities	24	0	0	0	0	0	\$0	e
5. Notification requirements								
A. Review Notification of Modification	2	0	0	0	0	0	\$0	f
6. Reporting requirements								
A. Review initial design capacity report	1	0	0	0	0	0	\$0	g
B. Review annual NMOC emission rate report	2	9	18	18	1	2	\$942	h
C. Review landfill closure report	1	0	0	0	0	0	\$0	i
D. Review equipment removal report	1	0	0	0	0	0	\$0	i
E. Review Collection and Control System Design Plan	15	0	0	0	0	0	\$0	d
F. Review Revised Collection and Control System Design Plan	5	0	0	0	0	0	\$0	j
G. Review Initial Performance Test	12	0	0	0	0	0	\$0	d
H. Review Compliance Report	2	0	0	0	0	0	\$0	d
I. Review Annual Report	2	0	0	0	0	0	\$0	d
J. Review request for alternative timeline corrections	5	0	0	0	0	0	\$0	d
7. Travel Expenses for Tests Attended	3 days * (\$113 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1113 per trip						\$0	l
TOTAL BURDEN AND COST (SALARY)				2,436	122	244	\$127,504	
TOTAL ANNUAL HOURS						2,801		

a Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$375 per occurrence based on the size of the landfills expected to install controls beginning in year 2020. However, none of the landfills will conduct surface emission monitoring during this first 3-year period.

d Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period.

e Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

f Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period thus no landfills will have modifications.

g Number of occurrences are based on 2 estimated landfills expected to come online by 2015 and having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. No amended design capacity reports are expected in the first three years of this ICR since landfills will be recently opened and not yet applying for any expansions.

h Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

i We have assumed that no controlled landfill will close or remove equipment during this ICR period.

j Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.767(h).

k These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

l Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1113 per trip. The source for hotel and meals/incidental costs is based on FY' 14 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

**Table 3.C. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 3**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes
1. Read and understand rule requirements	40	60	2,400	2,400	120	240	\$125,620	a
2. Enter and update information into agency recordkeeping system	2	15	30	30	2	3	\$1,570	b
3. Required activities								
A. Observe initial performance test	12	0	0	0	0	0	\$0	c
B. Observe surface methane monitoring quarterly	20	0	0	0	0	0	\$0	c
C. Review operating parameters	1	0	0	0	0	0	\$0	d
D. Review continuous parameter monitoring	1	0	0	0	0	0	\$0	d
E. Review notification of performance test	2	0	0	0	0	0	\$0	d
4. Excess Emissions Enforcement Activities	24	0	0	0	0	0	\$0	e
5. Notification requirements								
A. Review Notification of Modification	2	0	0	0	0	0	\$0	f
6. Reporting requirements								
A. Review initial design capacity report	1	0	0	0	0	0	\$0	g
B. Review annual NMOC emission rate report	2	15	30	30	2	3	\$1,570	h
C. Review landfill closure report	1	0	0	0	0	0	\$0	i
D. Review equipment removal report	1	0	0	0	0	0	\$0	i
E. Review Collection and Control System Design Plan	15	0	0	0	0	0	\$0	d
F. Review Revised Collection and Control System Design Plan	5	0	0	0	0	0	\$0	j
G. Review Initial Performance Test	12	0	0	0	0	0	\$0	d
H. Review Compliance Report	2	0	0	0	0	0	\$0	d
I. Review Annual Report	2	0	0	0	0	0	\$0	d
J. Review request for alternative timeline corrections	5	0	0	0	0	0	\$0	d
7. Travel Expenses for Tests Attended	3 days * (\$113 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1113 per trip						\$0	l
TOTAL BURDEN AND COST (SALARY)				2,460	123	246	\$128,760	
TOTAL ANNUAL HOURS						2,829		

a Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$375 per occurrence based on the size of the landfills expected to install controls beginning in year 2020. However, none of the landfills will conduct surface emission monitoring during this first 3-year period.

d Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period.

e Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

f Number of occurrences is based on the number of controlled landfills. Assumes no controlled landfills during this ICR period thus no landfills will have modifications.

g Number of occurrences are based on 2 estimated landfills expected to come online by 2015 and having a design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. No amended design capacity reports are expected in the first three years of this ICR since landfills will be recently opened and not yet applying for any expansions.

h Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

i We have assumed that no controlled landfill will close or remove equipment during this ICR period.

j Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.767(h).

k These rates are from the Office of Personnel Management (OPM), 2014 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

l Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1113 per trip. The source for hotel and meals/incidental costs is based on FY' 14 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>