SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal), EPA ICR Number 1557.09, OMB Control Number 2060-0220.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Municipal Solid Waste (MSW) Landfills were proposed on May 30, 1991, promulgated on May 12, 1996, and amended on June 16, 1998 (63 FR 32753), February 24, 1999 (64 FR 9262), and April 10, 2000 (65 FR 18909). These regulations apply to MSW landfills for which construction, modification, or reconstruction commences on or after May 30, 1991. A MSW landfill is an entire disposal facility in a contiguous geographical space where household waste is placed in or on. An MSW landfill may also receive other types of RCRA Subtitle D wastes (§257.2 of this title) such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads. An MSW landfill may be publicly or privately owned, and may be a new landfill, an existing landfill, or a lateral expansion. This information is being collected to assure compliance with 40 CFR Part 60, Subpart WWW.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of 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. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

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

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

Over the next three years, an average of 195 respondents per year will be subject to the standard, and four additional respondents per year will become subject to the standard.

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

In the United States, there are approximately 195 MSW facilities, which are owned and operated by the municipal solid waste industry (the "Affected Public"). While a majority of the facilities are privately owned, for-profit businesses, some landfills could be owned by municipal, state, or tribal government. At this time, the number of publicly-owned landfills cannot be determined. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent may be found in Table 2: Average Annual EPA Burden – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

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 standards of performance for new stationary sources that reflect:

> **. . .** application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

reasonably require.

In the Administrator's judgment, methane, carbon dioxide, and non-methane organic gas compound emissions from MSW landfills cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart WWW.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

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

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

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

3. Nonduplication, Consultations, and Other Collection Criteria

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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the *Federal Register*.

3(c) Consultations

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

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Solid Waste Association of North America (SWANA) at (800) 467-9262, and the National Waste & Recycling Association (NW&RA) at (202) 244-4700.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. SWANA and NW&RA submitted concurrent comments regarding the current estimates for number of respondents, capital/startup and operation and maintenance costs, types of reporting and recordkeeping activities and the burden associated with the activities. The comment letter states the following:

1. The current estimate for total number of respondents is inaccurate because the EPA Fact Sheet for the recently proposed Updates to the NSPS for NSW Landfills (79 FR 41796) states that "about 1,000 MSW landfills are subject to either the 1996 emission guidelines for MSW landfills 40 CFR Part 60, Subpart Cc, or the 1996 NSPS for new or modified landfills (Subpart WWW)". We did not increase the estimated number of respondents from 195 to 1,000 because it is unclear how many of the 1,000 facilities the commenters believe are subject to Subpart WWW provisions alone. The two subparts apply to different sets of facilities: Subpart Cc applies to all landfills constructed, reconstructed, or modified prior to May 30, 1991 and Subpart WWW apples to all landfills constructed, reconstructed, or modified on or after May 30, 1991.

2. The current estimates for the capital/startup and operating and maintenance (O&M) costs in Section 6(b)(iii) are too low because EPA has not included the purchase price and O&M costs for (1) flow meters, (2) thermocouples, and (3) data recorders. In this ICR, we have incorporated the suggested purchase price and O&M costs for all three devices.

3. The assumption that only new respondents will need to conduct quarterly surface methane monitoring is incorrect because the activity is required for all respondents that operate a gas collection and control system (GCCS). We have made the appropriate change to our burden calculations to address this comment.

4. The current burden estimate only includes the initial performance test report and quarterly surface methane monitoring under required activities. The comment states that we neglected to include the required monthly wellhead monitoring and the burden of conducting Tier 2 and 3 testing. The commenter also provides a table with examples of the annual costs that a landfill subject to the regulation would expect (see table below).

Requirement	Price Per	Annual Total
Annual report (now semi-annual)	$5,000/each	$10,000
Semi-annual SSM reports	$2,000/each	$4,000
Quarterly SEM	$2,500/quarter	$10,000
Remonitoring for SEM	$2,500/year	$2,500
Monthly wellhead monitoring	$2,000/month	$24,000
Remonitoring for wells	$5,000/year	$5,000
O&M of monitoring equipment	$5,000/year	$5,000
Recordkeeping and data storage	$1,000/month	$12,000
Data compilation and review	$500/month	$6,000

In response to this comment, EPA incorporated the suggested costs into our burden estimate, with the following exceptions: (1) We did not change the annual report to a semi-annual report because the regulations do not require semi-annual reporting; (2) we did not incorporate the suggested costs for the semi-annual shutdown, startup and malfunction (SSM) report because that is only a requirement of the NESHAP for landfills (40 CFR Part 63 Subpart AAAA); (3) we did not include the cost of remonitoring for wells because Subpart WWW does not require remonitoring for wells; (4) we did not add this suggested cost of O&M of monitoring equipment because the O&M costs of monitoring equipment were addressed in an earlier comment; and (5) we did not include the cost of conducting Tier 2 and Tier 3 testing because the comment letter does not specify the burden of this activity.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and

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

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are MSW landfills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 9511, which corresponds to the North American Industry Classification System (NAICS) 924110 for Air and Water Resources and Solid Waste Management.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

A source must make the following reports:

Notifications	
Notification of actual startup	60.7(a)(3)

Reports	
Initial design capacity report	60.7(a)(1), 60.757(a)
Initial and annual non-methane organic compounds (NMOC) emission rate reports	60.757(b)
Collection and control system design plan	60.757(c)
Landfill closure report	60.757(d)
Equipment removal report	60.757(e)
Initial and annual operations reports	60.8, 60.757(f)

A source must keep the following records:

Recordkeeping	
Maintain records of maximum design capacity, refuse-in-place, year-by-year waste acceptance rate (maintain for 5 years)	60.758(a)
Maintain records of system design and initial performance test/compliance determination (must be kept for life of the control equipment; records of subsequent tests must be maintained for 5 years)	60.758(b)
Maintain records of monitoring for five years	60.758(c)
Maintain records of plot map and well locations for the life of the landfill (for life of the collection system)	60.758(d)
Maintain records of collection and control system exceedances for 5 years	60.758(e)

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Perform initial performance test, Reference Method 25, 25C, 18 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

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

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

Agency Activities
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual and quarterly reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS 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.

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

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The

individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 111,471 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$128.02 ($60.98 + 110%)
Technical	$101.05 ($48.12 + 110%)
Clerical	$51.37 ($24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

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

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M [1]	(G) Total O&M, (E X F)
Portable	$8,100	4	$32,400	$1,000	175	$175,000

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Methane Monitor						
Flow Meter	$3,000	4	$12,000	$1,000	175	$175,000
Thermocouple	$500	4	$2,000	$1,000	175	$175,000
Data Recorder	$4,500	4	$18,000	$1,000	175	$175,000
TOTAL			**$64,400**			**$700,000**

[1] Only respondents that have active gas collection and control systems (GCCS) need to have these equipment installed. There are a total of 195 MSW landfills subject to this standard. We assume 90% of these landfills have GCCS installed (175 sources).

The total capital/startup costs for this ICR are $64,400. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $700,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $764,400. These are recordkeeping costs.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be $30,932.

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

Managerial	$62.90 (GS-13, Step 5, $39.31 + 60%)
Technical	$46.67 (GS-12, Step 1, $29.17 + 60%)
Clerical	$25.25 (GS-6, Step 3, $15.78 + 60%)

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. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 195 existing respondents will be subject to the standard. It is estimated that an additional 4 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 195 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	4	187	0	0	191
2	4	191	0	0	195
3	4	195	0	0	199
Average	4	191	0	0	195

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 195.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial performance report	4	1	N/A	4
Initial design capacity report	4	1	N/A	4
Report of non-methane organic compounds flow rate	20	1	N/A	20
Report of tier 2 and 3 NMOC sampling	20	1	N/A	20
Annual reports	195	1	N/A	195
Total Number of Annual Responses				243

The number of Total Annual Responses is 243.

The total annual labor costs are $10,913,267. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 111,471. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 459 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $764,400. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 525 labor hours at a cost of $30,932. See Table 2: Average Annual EPA Burden and Cost – NSPS

for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved ICR Burdens. This increase is not due to any program changes. The change in burden and cost estimates occurred as a result of incorporating comments received from industry consultations. In general, the comments addressed respondent activities that were not included in the previous ICR and increased the burden estimate for activities that were already included. The details of the comments received from industry and how they were incorporated can be found in Section 3(c) – Consultations. Incorporating the comments resulted in a substantial increase in the labor and cost burden estimates. In addition, a small amount of the increase in burden cost is due to the use of the most updated labor rates.

There is also an increase in the total estimated Capital/Startup and O&M costs. This increase occurred as a result of incorporating comments received from industry consultations. In general, the comments stated that the previous ICR did not include the purchase price and O&M costs of three additional devices that respondents are required to use. The cost of the devices can be found in section 6(a)(iii) – Capital/Startup vs. Operation and Maintenance Costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 459 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 valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0047. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified

in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2014-0047 and OMB Control Number 2060-0220 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost –NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)

Burden item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions [c]	1	1	1	195	195	9.75	19.5	$21,954.66
B. Required Activities [d]								
Initial performance test report	2	1	2	4	8	0.4	0.8	$900.70
Surface methane monitoring quarterly[e]	22	4	88	175.5	15444	772.2	1544.4	$1,738,809.07
Remonitoring for surface methane monitoring[f]	22	1	22	175.5	3861	193.05	386.1	$434,702.27
Wellhead monitoring monthly[g]	18	12	216	175.5	37908	1895.4	3790.8	$4,267,985.90
C. Create Information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial design capacity report [h]	2	1	2	4	8	0.4	0.8	$900.70
Report of non-methane organic compounds (NMOC) flow rate [i]	2	1	2	20	39	1.95	3.9	$4,390.93
Report of tier 2 and 3 NMOC sampling Change [j]	12	1	12	20	234	11.7	23.4	$26,345.59
Initial performance test	See 3B							
Compliance report	See 3B							
Annual report [k]	44	1	44	195	8580	429	858	$966,005.04
Reporting Subtotal						***76,219***		***$7,461,995***
4. Recordkeeping requirements								
A. Read Instructions	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Recordkeeping and data storage [l]	9	12	108	195	21060	1053	2106	$2,371,103.28
Data compilation and review [m]	4	12	48	195	9360	468	936	$1,053,823.68
Record of accumulated refuse [j]	8	1	8	29	234	11.7	23.4	$26,345.59

Burden item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year [b]
F. Train to train personnel	N/A							
G. Audits	N/A							
Recordkeeping Subtotal					***35,252***			***$3,451,273***
TOTAL LABOR BURDEN AND COST					***111,471***			***$10,913,267***

Assumptions:

[a] We have assumed that the average number of existing respondents is 195 plus 4 additional new sources who will become subject to the rule over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $128.02 per hour for Executive, Administrative, and Managerial labor; $101.05 per hour for Technical labor, and $51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that it will take one hour for each respondent to read instructions as part of their reporting requirements.

[d] We have assumed that 90 percent of new respondents will also have an active gas collection system.

[e] Based on industry comments, we assume that quarterly surface methane monitoring will cost $2,500 per quarter per respondent, which is approximately 22 technical person hours per occurrence.

[f] Based on industry comments, we assume that re-monitoring for surface methane monitoring will occur approximately once per year per respondent and cost $2,500 per occurrence, which is approximately 22 technical person hours per occurrence.

[g] Based on industry comments, we assume that monthly wellhead monitoring will cost $2,000 per month per respondent, which is approximately 18 technical person hours per occurrence.

[h] We have assumed that it will take two hours for each respondent to complete the initial design capacity report.

[i] We have assumed that 10 percent of respondents will have to complete the non-methane organic compounds flow rate report.

[j] We have assumed that all sources completing reports of non-methane organic compounds flow will have to complete the non-methane organic compound sampling report.

[k] Based on industry comments, we assume that the annual report will cost $5,000 to write, which is approximately 44 technical person hours per occurrence.

[l] Based on industry comments, we assume that recordkeeping and data storage will cost $1,000 per month per respondent, which is approximately 9 technical person hours per occurrence.

[m] Based on industry comments, we assume that data compilation and review will cost $500 per month per respondent, which is approximately 4 technical person hours per occurrence.

[n] We have assumed that 15 percent of respondents will take 8 hours to enter the record of accumulated refuse information

Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)

Burden item	(A) Technical person hours per occurrence	(B) Number of occurrences per year	(C) Technical person hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=0.05xE)	(G) Clerical hours per year (G=0.1xE)	(H) Total Cost, per year[b]
Review reports								
Initial design capacity	2	1	2	4	8	0.4	0.8	$542.07
Review NMOC emission rate reports [c]	1	1	1	20	19.5	0.975	1.95	$1,321.29
Review tier 2 calculations [d]	1	1	1	20	19.5	0.975	1.95	$1,321.29
Review tier 3 calculations [d]	1	1	1	20	19.5	0.975	1.95	$1,321.29
Annual report [e]	2	1	2	195	390	19.5	39	$26,425.82
TOTAL LABOR BURDEN AND COST					***525***			***$30,932***

Assumptions:

[a] We have assumed that the average number of existing respondents is 195 plus 4 additional new sources who will become subject to the rule over the three-year period of this ICR.

[b] This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: $62.90 for Managerial (GS-13, Step 5, $39.31+60%), $46.67 for Technical (GS-12, Step 1, $29.17 + 60%) and $25.25 Clerical (GS-6, Step 3, $15.78 + 60%). These rates are from the Office of Personnel Management (OPM) "2014 General Schedule" which excludes locality rates of pay.

[c] We have assumed that the agency will take one hour once per year to review each of the non-methane organic compounds emission rate reports for 10 percent of respondents.

[d] We have assumed that the agency will take one hour once per year to review each of the tier 1 and 3 calculations for 10 percent of respondents.

[e] We have assumed that the agency will take two hours once per year to review each of the annual reports submitted by each of 195 respondents.