

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills
(40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal), EPA ICR Number 1893.07, OMB Control Number 2060-0430.

1(b) Short Characterization/Abstract

The Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills were proposed on May 30, 1991, and promulgated on March 12, 1996. The emission guidelines are implemented through either State or Federal plans (40 CFR Part 62, Subpart GGG), which EPA developed for landfills located in States and Indian countries that did not develop State or Tribal plans. States directly implement and enforce their own State plans, whereas EPA both implements and enforces the Federal plan. State plans were due to EPA by December 12, 1996, and the Federal plan was promulgated on November 8, 1999. These regulations apply to existing municipal solid waste (MSW) landfills that commenced modification or construction before May 30, 1991, accepted waste at any time since November 8, 1987, or have a capacity available for future waste deposition. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG.

In general, all emission guidelines require initial notification reports, 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 the emission guidelines.

Any owner/operator subject to the provisions of this part shall maintain a file of these documents, and retain the file for at least five years following the date of such maintenance reports and records. For landfills subject to a State plan, reports are sent to the State or local authority that developed the State plan. For landfills subject to the Federal plan, reports are sent to the respective U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 431 MSW landfills (the "Affected Public"). Of these, approximately 142 (33%) facilities are owned and operated by privately-owned, for-profit businesses; 289 (67%) facilities in the United States are publicly-owned, i.e. owned by either state, local, tribal or the Federal government. We assume that they will all respond to EPA

inquiries. The “burden” to the “Affected Public” may be found below in Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

For landfills covered by a State plan, both State and local agencies are the “implementing agency,” and will incur a burden through the review of reports submitted to them in accordance with the State plan. We assume 67 percent of sources are subject to State plans, and that 34 State and local agencies enforce the State plans. The “burden” to State and local agencies is attributed entirely to work performed by either State and/or local employees, and is provided below in Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

For landfills covered by the Federal plan, EPA is the implementing agency. We assume 33 percent of landfills are subject to the Federal plan. The “burden” to the Federal government is attributed entirely to work performed by either Federal employees or government contractors and is provided below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG).

Over the next three years, approximately 431 MSW landfill owners/operators and 34 State/local agencies, for a total of 465 respondents per year will be subject to these standards. We estimate a three percent landfill closure rate, or a decrease of 14 landfills per year. This figure is based on the landfill closure rate from the previous ICR, and has been verified with our internal experts. No additional sources will become subject to this regulation during the next three years. It is not possible for additional facilities to qualify as an existing source, since they would have to be operational already and exceed the design capacity requirements before May 30, 1991.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to

which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control

equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis 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, non-methane organic (NMOC) emissions from MSW landfills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the emission guidelines were promulgated for this source category at 40 CFR Part 60, Subpart Cc, and Part 62 Subpart GGG.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with these standards at all times.

The notifications required in these standards 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 and that these standards are being met. The performance test may also be observed.

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

determinations.

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

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted 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, duplication does not exist.

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 (80 FR 32116) on June 5, 2015. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Solid Waste Association of North America, at (800) 467-9262; and 2) the United States Conference of Mayors, Municipal Waste Management Association, at (202) 861-6798.

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. In this case, no comments were received.

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 (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

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 owners and operators of MSW landfills. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are provided in the following table:

Standard (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG)	SIC Codes	NAICS Codes
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Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110
Solid Waste Landfill	4953	562212

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG).

A source must make the following reports:

Notifications / Reports	
Initial design capacity report. ¹	60.33c(d), 60.757(a) 62.14355(a)(1)
Initial and annual NMOC emission rate reports. ¹	60.33c(e)(1)(i), 60.757(b) 62.14355(a)(2)
Collection and control system design plan. ¹	60.757(c), 62.14355
Increments of progress report. ¹	62.14355(b-c)
Annual compliance report	60.757(f)
Landfill closure report	60.757(d)
Equipment removal report	60.757(e)

¹ Because landfills have been subject to the emission guidelines for several years, they have already completed initial notifications and submitted design plans. Since subpart Cc only applies to existing sources, and no additional sources are expected, only routine reporting, and recordkeeping requirements currently apply.

A source must keep the following records:

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

Recordkeeping	
monitoring exceedances (maintain for five years)	

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Write the 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.

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 performance tests if necessary (requirement no longer applies).
Review reports required to be submitted by industry. Annual compliance, amended design, and closure reports are the only types of reports expected to be submitted by respondents and reviewed by EPA or State and local agencies during the time period covered by this ICR.
Review surface monitoring methane concentrations.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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

The majority of respondents are large entities (i.e., large businesses). There are no small entities (i.e., small businesses) affected by this regulation. Therefore, EPA does not expect that small MSW landfills will be impacted adversely by the emissions guidelines. Small landfills were required to submit a one-time design capacity report only. In choosing a design capacity of 2.5 million megagrams (Mg) and 2.5 million cubic meters as the regulatory cutoff for annual reporting, EPA exempted landfills that are very unlikely to emit 50 Mg or more of NMOC per year (see 61 FR 9918, March 12, 1996). EPA also developed a computer model version of the tiered approach to estimate emissions on the landfills website (<http://www3.epa.gov/ttn/atw/landfill/landflpg.html>) that is available to any owner or operator subject to the emission guidelines. Such tools significantly reduced the burden of the NMOC emission rate calculation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal), and in Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1a documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the subparts included in this ICR. The individual burdens are expressed under standardized headings for landfills, both privately and publicly-owned, that are believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

Table 1b documents the computation of annual burden for State and local agencies that implement and enforce the State plan. State and local agency burden is expressed under standardized headings, which are believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. On average, 34 State/local agencies will be enforcing State plans that cover 289 landfills affected by State plans. State and local agencies conduct the same activities as EPA.

In total, the emission guidelines for MSW landfills are estimated to affect an average of 431 landfills. Of these, 142 are affected by the Federal plan and 289 are affected by State plans. This ICR assumes all 431 landfills have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports. The landfills must submit annual compliance reports and conduct quarterly monitoring for methane emissions from the surface of the landfill.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 38,200 hours (Total Labor Hours from Table 1a below). The average annual burden to State and local agencies that implement and enforce State plans is 692 hours (Total Labor Hours from Table 1b below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the emission guideline 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	\$129.93 (\$61.87+ 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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.

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

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

The type of industry costs associated with the information collection activities in the subject standards 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. No capital/startup costs are included in this ICR since these costs would have been incurred in the first year by existing sources, and since no new sources are expected. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
NA	\$0	0	\$0	\$1,400	431	\$603,000

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$603,000. This is the total of column G.

The average annual cost for capital/startup and/or operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$603,000. 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 \$15,500.

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 – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 431 landfill owners/operators and 34 State/local agencies, for a total of 465 existing respondents will be subject to the standard. It is estimated that 14 respondents per year will undergo landfill closures and will no longer be subject to the emission guidelines. The overall average number of respondents, as shown in the tables below, is 465 per year (431 + 34 = 465).

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

Number of Respondents					
Year	(A) Number of Existing Respondents	(B) Number of Existing Respondents that keep records but do not submit reports	(C) Number of Existing Respondents That Are No Longer Subject ¹	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B-C-D)
Private Landfills					
1	152	0	5	0	147
2	147	0	5	0	142
3	142	0	5	0	137
				Average	142
Public Landfills					
1	307	0	9	0	298
2	298	0	9	0	289
3	289	0	9	0	280
				Average	289
Total for Private and Public Landfills					431

¹ This ICR assumes a landfill closure rate of three percent. Upon closure, these landfills will no longer be subject to the emission guidelines.

Number of State and Local Agencies					
Year	(A) Number of Existing Respondents	(B) Number of Existing Respondents that keep records but do not submit reports	(C) Number of Existing Respondents That Are No Longer Subject ¹	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B-C-D)
State/Local Agencies					
1	36	0	1	0	35
2	35	0	1	0	34
3	34	0	1	0	33
				Average	34

¹ This ICR assumes a landfill closure rate of three percent. Upon closure, these landfills will no longer be subject to the emission guidelines. This ICR also assumes there will be a proportional decrease in the number of State/local agency respondents.

Column C and D are subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 431 landfill owners/operators and 34 State/local agencies, for a total respondent count of 465.

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 $E=(B \times C)+(C \times D)$
Private Landfills				
Amended design capacity report	7.1	1	0	7.1
Annual compliance report	142	1	0	142
Landfill closure report	5	1	0	5
Surface methane monitoring	0	4	142	568
Total Responses for Private Landfills (rounded)				722
Public Landfills				
Amended design capacity report	14.45	1	0	14.45
Annual compliance report	289	1	0	289
Landfill closure report	9	1	0	9
Surface methane monitoring	0	4	289	1,156
Total Responses for Public Landfills (rounded)				1,468
State/Local Agencies				
Amended design capacity report	14.45	1	0	14.45
Annual compliance report	289	1	0	289
Landfill closure report	9	1	0	9
Surface methane monitoring	0	4	0	0
Total Responses for State/Local Agencies (rounded)				312
Total Responses (rounded)				2,502

The number of Total Annual Responses is 2,502.

The total annual labor costs to landfill owners/operators is \$2,450,000. Details regarding these estimates may be found below in Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

The total annual labor costs to State and local agencies is \$31,500. Details regarding these estimates may be found below in Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 for landfill owners/operators are 38,200 hours. Details regarding these estimates may be found below in Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

The total annual labor hours for State/local agencies is 692. Details regarding these estimates may be found below in Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this overall collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$603,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The following table summarizes the respondent tally from Tables 1a and Table 1b.

Respondent Tally					
Entity	Number of respondents	Number of responses per year	Total hours per year	Total annual labor cost	Total annual O&M costs
Private landfills	142	722	12,602	\$1,267,267	\$198,800
Public landfills	289	1,468	25,645	\$1,185,472	\$404,600
State/local agencies	34	312	692	\$31,500	\$0
Total (rounded)	465	2,502	38,900	\$2,480,000	\$603,000

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 341 labor hours at a cost of \$15,500. See below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40

CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is a net decrease in the total burden associated with privately- and publicly-owned landfills and State and local agencies. This decrease in burden from the most recently-approved ICR is due to an adjustment to the estimated average number of respondents. To account for landfill closures that have occurred since the previous ICR was approved, this ICR applies a three percent per year landfill closure rate to the previous ICR's estimated number of respondents. This results in a decrease in the respondent labor hours, labor costs, O&M costs, and number of responses. There is also a corresponding decrease in the Agency burden and cost.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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-2012-0680. 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), WJC 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) 566-1752. 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-2012-0680 and OMB Control Number 2060-0430 in any correspondence.

Part B of the Supporting Statement

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

Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^{b,c}
1. Reporting Requirements (Privately Owned Landfills)								
A. Familiarize with regulatory requirements ^d	1	1	1	142	142	7.1	14.2	\$16,421.66
B. Initial design capacity report	N/A	1	0	0	0	0	0	\$0
C. Initial and annual NMOC emission rate reports ^e	N/A	1	0	0	0	0	0	\$0
D. Collection and control system design plan	N/A	1	0	0	0	0	0	\$0
E. Increments of progress	N/A	5	0	0	0	0	0	\$0
F. Amended design capacity report ^f	2	1	2	7.1	14.2	0.71	1.42	\$1,642.17
G. Annual compliance report ^g	2	1	2	142	284	14.2	28.4	\$32,843.32
H. Landfill closure report ^h	2	1	2	5	10	0.50	1	\$1,156.46
I. Equipment removal report ⁱ	2	1	2	0	0	0	0	\$0
J. Surface methane monitoring	14	4	56	142	7,952	397.6	795.2	\$919,613.02
Subtotal for Reporting Requirements for Privately Owned						9,663		\$971,677
2. Reporting Requirements (Publicly Owned Landfills)								
A. Familiarize with regulatory requirements ^d	1	1	1	289	289	14.45	28.9	\$33,421.55
B. Initial design capacity report	N/A	1	0	0	0	0	0	\$0

C. Initial and annual NMOC emission rate reports ^e	N/A	1	0	0	0	0	0	\$0
D. Collection and control system design plan	N/A	1	0	0	0	0	0	\$0
E. Increments of progress	N/A	5	0	0	0	0	0	\$0
F. Amended design capacity report ^f	2	1	2	14.45	28.9	1.45	2.89	\$1,512.63
G. Annual compliance report ^g	2	1	2	289	578	28.9	57.8	\$30,252.52
H. Landfill closure report ^h	2	1	2	9	18	0.90	1.8	\$942.12
I. Equipment removal report ⁱ	2	1	2	0	0	0	0	\$0
J. Surface methane monitoring	14	4	56	289	16,184	809.2	1618.4	\$847,070.56
Subtotal for Reporting Requirements for Publicly Owned						19,663		\$913,199
3. Recordkeeping Requirements (Privately Owned Landfills)								
A. Records of control system monitoring	0.5	12	6	142	852	42.6	85.2	\$98,529.97
B. Records of accumulated refuse	8	1	8	142	1,136	56.8	113.6	\$131,373.29
C. Records of surface methane monitoring	0.5	4	2	142	284	14.2	28.4	\$32,843.32
D. Records of collection and control system exceedances	0.5	4	2	142	284	14.2	28.4	\$32,843.32
E. Records of system design and initial performance test	N/A	4	0	142	0	0	0	\$0
Subtotal for Recordkeeping Requirements for Privately Owned						2,939		\$295,590
4. Recordkeeping Requirements (Publicly Owned Landfills)								
A. Records of control system monitoring	0.5	12	6	289	1,734	86.7	173.4	\$90,757.56
B. Records of accumulated refuse	8	1	8	289	2,312	115.6	231.2	\$121,010.08
C. Records of surface methane monitoring	0.5	4	2	289	578	28.9	57.8	\$30,252.52

D. Records of collection and control system exceedances	0.5	4	2	289	578	28.9	57.8	\$30,252.52
E. Records of system design and initial performance test	N/A	4	0	289	0	0	0	\$0
Subtotal for Recordkeeping Requirements for Publicly Owned Landfills						5,982		\$272,273
Reporting and Recordkeeping Subtotals for Privately and Publicly Owned Landfills:								
Reporting Labor Burden (Privately Owned Landfills)						9,663		\$971,676.62
Recordkeeping Labor Burden (Privately Owned Landfills)						2,939		\$295,589.90
Subtotal Labor Burden and Cost (Privately Owned Landfills)						12,602		\$1,267,267
Reporting Labor Burden (Publicly Owned Landfills)						19,663		\$913,199.38
Recordkeeping Labor Burden (Publicly Owned Landfills)						5,982		\$272,272.68
Subtotal Labor Burden and Cost (Publicly Owned Landfills)						25,645		\$1,185,472
TOTAL LABOR BURDEN AND COST (rounded) ^j						38,200		\$2,450,000
TOTAL CAPITAL AND O&M COST (rounded) ^j								\$603,000
GRAND TOTAL (rounded) ^j								\$3,050,000

Assumptions:

^a We estimate there are 431 existing landfills subject to the emission guidelines. Of these, we estimate 142 (33%) landfills are private and 289 (67%) are public.

^b This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%); and Clerical \$51.79 (\$24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^c Labor rates for Federal agency personnel were applied to publicly owned landfills, and are based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2014 General Schedule,

which excludes locality rates of pay. The rates have been applied to local agencies and have been increased by 60 percent to account for the benefit packages available to government employees.

^d This ICR assumes all owners/operators of MSW landfills will have to re-familiarize with regulatory requirements each year

^e This ICR assumes that all landfills affected by a State plan or the Federal plan have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports.

^f This ICR assumes 5 percent of landfills will submit an amended design capacity report per year.

^g We estimate that 33% of landfills are subject to the Federal plan and 67% of landfills are subject to a State plan. Our estimate of 142 private landfills includes 47 private landfills subject to the Federal plan and 95 private landfills subject to a State plan. Our estimate of 289 public landfills includes 95 public landfills subject to the Federal plan and 194 public landfills subject to a State plan.

^h This ICR assumes 3 percent of landfills will submit a landfill closure report per year.

ⁱ This ICR assumes no landfills will submit an equipment removal report over the 3-year period of this ICR.

^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per landfill per year	(C) Landfills per agency (Average no. in States enforcing State plans) ^a	(D) Technical person-hours per agency per year (D=AxBxC)	(E) No. of agencies enforcing State plans ^a	(F) Technical hours per year (F=DxE)	(G) Management hours per year (G=Fx0.05)	(H) Clerical hours per year (H=Fx0.10)	(I) Total cost per year (\$) ^b
1. Reporting Requirements									
A. Review initial design capacity report	N/A	1	0	0	0	0	0	0	\$0
B. Review initial and annual NMOC emission rate reports ^c	N/A	1	0	0	0	0	0	0	\$0
C. Review collection and control system design plan	N/A	1	0	0	0	0	0	0	\$0
D. Review increments of progress	N/A	5	0	0	0	0	0	0	\$0
E. Review amended design capacity report ^d	1	1	0.43	0.43	34	14.62	0.73	1.46	\$765.21
F. Review annual compliance report ^e	2	1	8.5	17	34	578	29	58	\$30,252.52
G. Review landfill closure report ^f	1	1	0.26	0.26	34	8.84	0.44	0.88	\$462.69
H. Review equipment removal report ^g	1	1	0	0	0	0	0	0	\$0
Total Labor Burden and Cost (rounded)^h						692			\$31,500

Assumptions:

^a This ICR assumes that 289 landfills are subject to State plans, and that 34 State and local agencies will be enforcing State plans. Thus, each agency is expected to review reports for an average of 8.5 landfills.

^b Labor rates for Federal agency personnel were applied to State/Local agencies, and are based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2014 General Schedule, which excludes locality rates of pay. The rates have been applied to local agencies and have been increased by 60 percent to account for the benefit packages available to government employees.

^c This ICR assumes that all landfills affected by a State plan have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports.

^d This ICR assumes 5 percent of landfills will submit an amended design capacity report per year.

^e We estimate that 33% of landfills are subject to the Federal plan and 67% of landfills are subject to a State plan. Our estimate of 289 landfills subject to a State plan includes 95 private landfills and 194 public landfills.

^f This ICR assumes 3 percent of landfills will submit a landfill closure report per year.

^g This ICR assumes no landfills will submit an equipment removal report over the 3-year period of this ICR.

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^b
1. Reporting Requirements								
A. Review initial design capacity report	N/A	1	0	0	0	0	0	\$0
B. Review initial and annual NMOC rate reports ^c	N/A	1	0	0	0	0	0	\$0
C. Review collection and control system design plan	N/A	1	0	0	0	0	0	\$0
D. Review increments of progress	N/A	5	0	0	0	0	0	\$0
E. Review amended design capacity report	1	1	1	7.1	7.1	0.36	0.71	\$371.61
F. Review annual compliance report	2	1	2	142	284	14.2	28.4	\$14,864.56
G. Review landfill closure report ^e	1	1	1	5	5	0.25	0.5	\$261.70
H. Review equipment removal report ^f	1	1	1	0	0	0	0	\$0
Total Labor Burden and Cost (rounded)^h						341		\$15,500

Assumptions:

^a We estimate there are 431 existing landfills that are subject to the emission guidelines. Of these, we estimate 142 (33%) of landfills are private and 289 (67%) are public.

^b This cost is based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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.

^c This ICR assumes that all landfills affected by a State plan or the Federal plan have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports.

^d This ICR assumes 5 percent of landfills will submit an amended design capacity report per year.

^e We estimate that 33% of landfills are subject to the Federal plan and 67% of landfills are subject to a State plan. Our estimate of 142 landfills subject to the Federal plan includes 47 private landfills and 95 public landfills.

^f This ICR assumes 3 percent of landfills will submit a landfill closure report per year.

^g This ICR assumes no landfills will submit an equipment removal report over the 3-year period of this ICR.

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.