

Table 1a: Annual Respondent Burden and Cost – Emission Guidelines and Compliance 1

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)
1. Reporting Requirements (Privately Owned Landfills)			
A. Familiarize with regulatory requirements ^d	1	1	1
B. Initial design capacity report	N/A	1	0
C. Initial and annual NMOC emission rate reports ^e	N/A	1	0
D. Collection and control system design plan	N/A	1	0
E. Increments of progress	N/A	5	0
F. Amended design capacity report ^f	2	1	2
G. Annual compliance report ^g	2	1	2
H. Landfill closure report ^h	2	1	2
I. Equipment removal report ⁱ	2	1	2
J. Surface methane monitoring	14	4	56
Subtotal for Reporting Requirements for Privately Owned			
2. Reporting Requirements (Publicly Owned Landfills)			
A. Familiarize with regulatory requirements ^d	1	1	1
B. Initial design capacity report	N/A	1	0
C. Initial and annual NMOC emission rate reports ^e	N/A	1	0
D. Collection and control system design plan	N/A	1	0
E. Increments of progress	N/A	5	0
F. Amended design capacity report ^f	2	1	2
G. Annual compliance report ^g	2	1	2
H. Landfill closure report ^h	2	1	2
I. Equipment removal report ⁱ	2	1	2
J. Surface methane monitoring	14	4	56
Subtotal for Reporting Requirements for Publicly Owned			
3. Recordkeeping Requirements (Privately Owned Landfills)			
A. Records of control system monitoring	0.5	12	6
B. Records of accumulated refuse	8	1	8
C. Records of surface methane monitoring	0.5	4	2
D. Records of collection and control system exceedances	0.5	4	2
E. Records of system design and initial performance test	N/A	4	0
Subtotal for Recordkeeping Requirements for Privately Owned			
4. Recordkeeping Requirements (Publicly Owned Landfills)			
A. Records of control system monitoring	0.5	12	6
B. Records of accumulated refuse	8	1	8
C. Records of surface methane monitoring	0.5	4	2

D. Records of collection and control system exceedances	0.5	4	2
E. Records of system design and initial performance test	N/A	4	0
Subtotal for Recordkeeping Requirements for Publicly Owned Landfills			
Reporting and Recordkeeping Subtotals for Privately and Publicly Owned Landfills			
Reporting Labor Burden (Privately Owned Landfills)			
Recordkeeping Labor Burden (Privately Owned Landfills)			
Subtotal Labor Burden and Cost (Privately Owned Landfills)			
Reporting Labor Burden (Publicly Owned Landfills)			
Recordkeeping Labor Burden (Publicly Owned Landfills)			
Subtotal Labor Burden and Cost (Publicly Owned Landfills)			
TOTAL LABOR BURDEN AND COST (rounded) ^j			
TOTAL CAPITAL AND O&M COST (rounded) ^j			
GRAND TOTAL (rounded) ^j			

Assumptions:

- ^a We estimate there are 431 existing landfills subject to the emission guidelines. Of these, we estimate 142 (33%)
- ^b This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%)
- ^c Labor rates for Federal agency personnel were applied to publicly owned landfills, and are based on the average
- ^d This ICR assumes all owners/operators of MSW landfills will have to re-familiarize with regulatory requirements
- ^e This ICR assumes that all landfills affected by a State plan or the Federal plan have already exceeded the 50 Mg
- ^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.
- ^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

Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 61)

Private	103.97	129.93	51.79
Public	46.67	62.9	25.25

(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}
142	142	7.1	14.2	\$16,421.66
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7.1	14.2	0.71	1.42	\$1,642.17
142	284	14.2	28.4	\$32,843.32
5	10	0.50	1.00	\$1,156.46
0	0	0	0	\$0
142	7,952	397.6	795.2	\$919,613.02
		9,663		\$971,677
289	289	14.45	28.9	\$33,421.55
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
14.45	28.9	1.45	2.89	\$1,512.63
289	578	28.9	57.8	\$30,252.52
9	18	0.90	1.8	\$942.12
0	0	0	0	\$0
289	16,184	809.2	1618.4	\$847,070.56
		19,663		\$913,199
142	852	42.6	85.2	\$98,529.97
142	1,136	56.8	113.6	\$131,373.29
142	284	14.2	28.4	\$32,843.32
142	284	14.2	28.4	\$32,843.32
142	0	0	0	\$0
		2,939		\$295,590
289	1,734	86.7	173.4	\$90,757.56
289	2,312	115.6	231.2	\$121,010.08
289	578	28.9	57.8	\$30,252.52

289	578	28.9	57.8	\$30,252.52
289	0	0	0	\$0
	5,982			\$272,273
	9,663			\$971,676.62
	2,939			\$295,589.90
	12,602			\$1,267,267
	19,663			\$913,199.38
	5,982			\$272,272.68
	25,645			\$1,185,472
	38,200			\$2,450,000
				\$603,000
				\$3,050,000

) landfills are private and 289 (67%) are public.

0%); and Clerical \$51.79 (\$24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor : hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.3: ts each year

/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports.

. Our estimate of 142 private landfills includes 47 private landfills subject to the Federal plan and 95 private landfills subj

art 62, Subpart GGG) (Renewal)

Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "1 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of 1

ect to a State plan. Our estimate of 289 public landfills includes 95 public landfills subject to the Federal plan and 194 p

Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those
Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2014 General Sche

ublic landfills subject to a State plan.

are 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. The rates have been applied to local agencies and have been increased by 60 percent to reflect the cost of living in the local area, which excludes locality rates of pay.

hours are 10 percent of Technical hours.

percent to account for the benefit packages available to government employees.

Table 1b: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Co

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
1. Reporting Requirements			
A. Review initial design capacity report	N/A	1	0
B. Review initial and annual NMOC emission rate reports ^c	N/A	1	0
C. Review collection and control system design plan	N/A	1	0
D. Review increments of progress	N/A	5	0
E. Review amended design capacity report ^d	1	1	0.43
F. Review annual compliance report ^e	2	1	8.5
G. Review landfill closure report ^f	1	1	0.26
H. Review equipment removal report ^g	1	1	0
Total Labor Burden and Cost (rounded) ^h			

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.
- ^b Labor rates for Federal agency personnel were applied to State/Local agencies, and are based on the average hourly labor rates for Federal agency personnel.
- ^c This ICR assumes that all landfills affected by a State plan have already exceeded the 50 Mg/yr NMOC emission threshold.
- ^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 estimates are based on the number of landfills subject to each plan.
- ^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.

Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and

46.67 62.9 25.25

(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
0	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
0.43	34	14.62	0.73	1.46	\$765.21
17	34	578	29	58	\$30,252.52
0.26	34	8.84	0.44	0.88	\$462.69
0	0	0	0	0	\$0
			692		\$31,500

State plans. Thus, each agency is expected to review reports for an average of 8.5 landfills.

hourly rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%);

landfills closed and are no longer submitting annual NMOC emission rate reports.

The estimate of 289 landfills subject to a State plan includes 95 private landfills and 194 public landfills:

d 40 CFR Part 62, Subpart GGG) (Renewal)

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, whi

ch excludes locality rates of pay. The rates have been applied to local agencies and have been increased by 60 percent to

o account for the benefit packages available to government employees.

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Time

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
1. Reporting Requirements				
A. Review initial design capacity report	N/A	1	0	0
B. Review initial and annual NMOC rate reports ^c	N/A	1	0	0
C. Review collection and control system design plan	N/A	1	0	0
D. Review increments of progress	N/A	5	0	0
^d	1	1	1	7.1
F. Review annual compliance report	2	1	2	142
G. Review landfill closure report ^e	1	1	1	5
H. Review equipment removal report ^f	1	1	1	0
Total Labor Burden and Cost (rounded) ^h				

Assumptions:

- ^a We estimate there are 431 existing landfills that are subject to the emission guidelines. Of these, we estimate 142 (33%) are subject to the Federal plan and 289 (67%) are subject to a State plan.
- ^b This cost is based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Management \$23.33 (GS-12, Step 1, \$14.00 + 60%).
- ^c This ICR assumes that all landfills affected by a State plan or the Federal plan have already exceeded the 50 Mg/yr NMOC limit.
- ^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 is based on the number of landfills that are subject to the Federal plan and the number of landfills that are subject to a State plan.
- ^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.

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46.67 62.9 25.25

(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=E\times0.05)	(G) Clerical hours per year (G=E\times0.10)	(H) Total cost per year (\$)^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
7.1	0.36	0.71	\$371.61
284	14.2	28.4	\$14,864.56
5	0.25	0.50	\$261.70
0	0	0	\$0
341			\$15,500

3%) of landfills are private and 289 (67%) are public.

anagerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes th
MOC emission threshold and are no longer submitting annual NMOC emission rate reports.

estimate of 142 landfills subject to the Federal plan includes 47 private landfills and 95 public landfills.

62, Subpart GGG) (Renewal)

at Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates a

are from the OPM, 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 pe

percent to account for the benefit packages available to government employees.