

**Table 1.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 1, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes	
1. Applications	na																
2. Surveys and Studies	na																
3. Reporting Requirements																	
A. Read and Understand Rule Requirements																	
1. Open or controlling landfills	40	\$0		1	0	40	482	0	19,277	1,928	964	\$1,830,491	\$0	0			d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	647	0	6,471	647	324	\$614,439	\$0	0			d
B. Required Activities																	
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	309	0	3,703	370	185	\$351,597	\$920,634	309	18,067		e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	372	63,890	0	0	0	\$3,185,178	\$675,208	0			a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	372	178,666	0	0	0	\$8,907,209	\$75,933	0			a, g
C. Create Information	Included in 3B																
D. Gather Information	Included in 3B																
E. Report Preparation																	
1. Initial design capacity report	2	\$0		1	0	2	177	0	353	35	18	\$33,541	\$0	177			h
2. Amended design capacity report	2	\$0		1	0	2	23	0	46	5	2	\$4,395	\$0	23			i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	81	0	648	65	32	\$61,510	\$0	81			j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	81	0	972	97	49	\$92,265	\$198,805	81	10,067		j, k
5. Landfill Closure Report	1	\$0		1	0	1	14	0	14	1	1	\$1,302	\$0	14			l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0			m
7. Collection and Control System Design Plan	80	\$0		1	0	80	309	0	24,685	2,468	1,234	\$2,343,979	\$0	309			f
8. Revised design plan	20	\$0		1	0	20	31	0	617	62	31	\$58,599	\$0	31			n
9. Initial Performance Test	Included in 3B																
10. Compliance Report	Included in 3B																
11. Annual Report	27	\$0		1	0	27	372	0	10,050	1,005	502	\$954,311	\$0	372			o
Reporting Subtotal								242,556	66,835	6,683	3,342	\$18,438,818	\$1,870,581	1,396	\$28,134		
4. Recordkeeping Requirements																	
A. Read Instructions	Included in 3a																
B. Plan Activities	na																
C. Implement Activities	na																
D. Develop Record System	na																
E. Record Information																	
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	372	0	22,333	2,233	1,117	\$2,120,691	\$0	0			p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	372	0	49,133	4,913	2,457	\$4,665,521	\$0	0			p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	272	0	1,090	109	54	\$103,461	\$0	0			q
E. Personnel Training	na																
F. Time for Audits	na																
Recordkeeping Subtotal								0	72,556	7,256	3,628	\$6,889,673	\$0	0	\$0		
Totals								242,556	139,391	13,939	6,970	\$25,328,491	\$1,870,581	1,396	\$28,134		

FOOTNOTES

a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.

b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

c Includes only responses that are submitted as reports.

d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one time requirement for new respondents. We have assumed that all open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject there requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.

e Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.

f We have assumed that 538 controlled open landfills will be subject to this requirement during the first year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmittal of the GCCS design plan.

g Assumes 649 controlled landfills during the first year of this ICR period, 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.

h Based on the regulatory database, there are 203 landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement. Based on the regulatory database, 87% of these respondents are public and 13% are private.

**Table 1.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 1, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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ⁱ Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.38f(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

^j

We have assumed that 50 percent of uncontrolled open landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.

^k Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.

^l We have assumed that 23 controlled landfills will close during the first year of the ICR period. This is based on the closure dates reported in the regulatory database.

^m We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.

ⁿ We have assumed that 10% of controlled landfill will revise their design plan.

^o

Assumes 649 controlled landfills during the first year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

^p

Assumes 649 controlled landfills during the first year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

^q Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

**Table 1.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 1, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year (B1+B2) x Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes	
1. Applications	na																
2. Surveys and Studies	na																
3. Reporting Requirements																	
A. Read and Understand Rule Requirements																	
1. Open or controlling landfills	40	\$0		1	0	40	303	0	12,123	1,212	606	\$1,151,151	\$0	0			d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	407	0	4,069	407	203	\$386,405	\$0	0			d
B. Required Activities																	
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	229	0	2,753	275	138	\$261,444	\$684,574	229	18,067		e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	277	47,508	0	0	0	\$2,368,466	\$502,078	0			a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	277	132,854	0	0	0	\$6,623,309	\$56,463	0			a, g
C. Create Information	Included in 3B																
D. Gather Information	Included in 3B																
E. Report Preparation																	
1. Initial design capacity report	2	\$0		1	0	2	26	0	53	5	3	\$5,012	\$0	26			h
2. Amended design capacity report	2	\$0		1	0	2	3	0	7	1	0	\$657	\$0	3			i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	28	0	224	22	11	\$21,292	\$0	28			j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	28	0	336	34	17	\$31,938	\$68,817	28	10,067		j, k
5. Landfill Closure Report	1	\$0		1	0	1	9	0	9	1	0	\$882	\$0	9			l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0			m
7. Collection and Control System Design Plan	80	\$0		1	0	80	229	0	18,355	1,836	918	\$1,742,959	\$0	229			f
8. Revised design plan	20	\$0		1	0	20	23	0	459	46	23	\$43,574	\$0	23			n
9. Initial Performance Test	Included in 3B																
10. Compliance Report	Included in 3B																
11. Annual Report	27	\$0		1	0	27	277	0	7,473	747	374	\$709,616	\$0	277			o
Reporting Subtotal								180,362	45,862	4,586	2,293	\$13,346,704	\$1,311,932	854	\$28,134		
4. Recordkeeping Requirements																	
A. Read Instructions	Included in 3a																
B. Plan Activities	na																
C. Implement Activities	na																
D. Develop Record System	na																
E. Record Information																	
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	277	0	16,607	1,661	830	\$1,576,924	\$0	0			p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	277	0	36,535	3,653	1,827	\$3,469,234	\$0	0			p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	67	0	266	27	13	\$25,300	\$0	0			q
E. Personnel Training	na																
F. Time for Audits	na																
Recordkeeping Subtotal								0	53,408	5,341	2,670	\$5,071,459	\$0	0	\$0		
Totals								180,362	99,270	9,927	4,964	\$18,418,163	\$1,311,932	854	\$28,134		

FOOTNOTES

- ^a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- ^b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c Includes only responses that are submitted as reports.
- ^d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one-time requirement for new respondents. We have assumed that all open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject these requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.
- ^e
- Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- ^f
- We have assumed that 538 controlled open landfills will be subject to this requirement during the first year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmittal of the GCCS design plan.
- ^g
- Assumes 649 controlled landfills during the first year of this ICR period. 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require remonitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- ^h Based on the regulatory database, there are 203 landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement. Based on the regulatory database, 87% of these respondents are public and 13% are private.

**Table 1.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 1, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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ⁱ Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.381(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

^j We have assumed that 50 percent of uncontrolled open landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.

^k Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.

^l We have assumed that 23 controlled landfills will close during the first year of the ICR period. This is based on the closure dates reported in the regulatory database.

^m We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.

ⁿ We have assumed that 10% of controlled landfill will revise their design plan.

^o Assumes 649 controlled landfills during the first year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

^p Assumes 649 controlled landfills during the first year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

^q Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

**Table 2.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 2, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year (B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes	
1. Applications	na																
2. Surveys and Studies	na																
3. Reporting Requirements																	
A. Read and Understand Rule Requirements																	
1. Open or controlling landfills	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0			d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	0	0	0	0	0	\$0	\$0	0			d
B. Required Activities																	
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	2	0	28	3	1	\$2,614	\$927,479	2	18,067		e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	343	58,869	0	0	0	\$2,934,879	\$622,149	0			a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	343	164,626	0	0	0	\$8,207,259	\$69,966	0			a, g
C. Create Information	Included in 3B																
D. Gather Information	Included in 3B																
E. Report Preparation																	
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0			h
2. Amended design capacity report	2	\$0		1	0	2	23	0	46	5	2	\$4,395	\$0	23			i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	79	0	636	64	32	\$60,382	\$0	79			j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	0	0	0	0	0	\$0	\$198,805	0	10,067		j, k
5. Landfill Closure Report	1	\$0		1	0	1	16	0	16	2	1	\$1,472	\$0	16			l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0			m
7. Collection and Control System Design Plan	80	\$0		1	0	80	2	0	184	18	9	\$17,427	\$0	2			f
8. Revised design plan	20	\$0		1	0	20	0	0	0	0	0	\$0	\$0	0			n
9. Initial Performance Test	Included in 3B																
10. Compliance Report	Included in 3B																
11. Annual Report	27	\$0		1	0	27	343	0	9,260	926	463	\$879,319	\$0	343			o
Reporting Subtotal								223,495	10,169	1,017	508	\$12,107,747	\$1,818,399	466	\$28,134		
4. Recordkeeping Requirements																	
A. Read Instructions	Included in 3a																
B. Plan Activities	na																
C. Implement Activities	na																
D. Develop Record System	na																
E. Record Information																	
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	343	0	20,578	2,058	1,029	\$1,954,042	\$0	0			p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	343	0	45,272	4,527	2,264	\$4,298,893	\$0	0			p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	302	0	1,207	121	60	\$114,571	\$0	0			q
E. Personnel Training	na																
F. Time for Audits	na																
Recordkeeping Subtotal								0	67,057	6,706	3,353	\$6,367,506	\$0	0	\$0		
Totals								223,495	77,226	7,723	3,861	\$18,475,253	\$1,818,399	466	\$28,134		

FOOTNOTES

^a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.

^b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c Includes only responses that are submitted as reports.

^d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one-time requirement for new respondents. We have assumed that all new open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject there requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.

^e

Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.

^f

We have assumed that 4 controlled open landfills will be subject to this requirement during the second year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmission of the GCCS design plan.

^g

Assumes 598 controlled landfills during the second year of this ICR period, 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.

^h All additional landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume were estimated to complete the one-time initial design capacity report in the first year of this ICR - no respondents in years 2&3.

ⁱ

Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.38f(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

Table 2.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 2, Proposed Option 2.5/34

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) x Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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We have assumed that 50 percent of uncontrolled open landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.

Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.

We have assumed that 26 controlled landfills will close during the second year of the ICR period. This is based on the closure dates reported in the regulatory database.

We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.

We have assumed that 10% of controlled landfill will revise their design plan.

Assumes 598 controlled landfills during the second year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

Assumes 598 controlled landfills during the second year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

**Table 2.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 2, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year (B1+B2) X Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes	
1. Applications	na																
2. Surveys and Studies	na																
3. Reporting Requirements																	
A. Read and Understand Rule Requirements																	
1. Open or controlling landfills	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0			d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	0	0	0	0	0	\$0	\$0	0			d
B. Required Activities																	
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	2	0	20	2	1	\$1,944	\$689,664	2	18,067		e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	255	43,775	0	0	0	\$2,182,346	\$462,623	0			a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	255	122,414	0	0	0	\$6,102,833	\$52,026	0			a, g
C. Create Information	Included in 3B																
D. Gather Information	Included in 3B																
E. Report Preparation																	
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0			h
2. Amended design capacity report	2	\$0		1	0	2	3	0	7	1	0	\$657	\$0	3			i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	28	0	220	22	11	\$20,901	\$0	28			j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	0	0	0	0	0	\$0	\$68,817	0	10,067		j, k
5. Landfill Closure Report	1	\$0		1	0	1	10	0	10	1	1	\$997	\$0	10			l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0			m
7. Collection and Control System Design Plan	80	\$0		1	0	80	2	0	136	14	7	\$12,959	\$0	2			f
8. Revised design plan	20	\$0		1	0	20	0	0	0	0	0	\$0	\$0	0			n
9. Initial Performance Test	Included in 3B																
10. Compliance Report	Included in 3B																
11. Annual Report	27	\$0		1	0	27	255	0	6,886	689	344	\$653,853	\$0	255			o
Reporting Subtotal								166,189	7,280	728	364	\$8,976,490	\$1,273,131	300	\$28,134		
4. Recordkeeping Requirements																	
A. Read Instructions	Included in 3a																
B. Plan Activities	na																
C. Implement Activities	na																
D. Develop Record System	na																
E. Record Information																	
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	255	0	15,302	1,530	765	\$1,453,006	\$0	0			p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	255	0	33,664	3,366	1,683	\$3,196,613	\$0	0			p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	88	0	353	35	18	\$33,562	\$0	0			q
E. Personnel Training	na																
F. Time for Audits	na																
Recordkeeping Subtotal								0	49,319	4,932	2,466	\$4,683,180	\$0	0	\$0		
Totals								166,189	56,599	5,660	2,830	\$13,659,670	\$1,273,131	300	\$28,134		

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one-time requirement for new respondents. We have assumed that all new open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject these requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.
- e
Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f
We have assumed that 4 controlled open landfills will be subject to this requirement during the second year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmission of the GCCS design plan.
- g
Assumes 598 controlled landfills during the second year of this ICR period, 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h All additional landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume were estimated to complete the one-time initial design capacity report in the first year of this ICR - no respondents in years 2&3.
- i Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.38f(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

**Table 2.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 2, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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^j We have assumed that 50 percent of uncontrolled open landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.

^k Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.

^l We have assumed that 26 controlled landfills will close during the second year of the ICR period. This is based on the closure dates reported in the regulatory database.

^m We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.

ⁿ We have assumed that 10% of controlled landfill will revise their design plan.

^o Assumes 598 controlled landfills during the second year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

^p Assumes 598 controlled landfills during the second year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

^q Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

**Table 3.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 3, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year (B1+B2) X Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes	
1. Applications	na																
2. Surveys and Studies	na																
3. Reporting Requirements																	
A. Read and Understand Rule Requirements																	
1. Open or controlling landfills	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0			d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	0	0	0	0	0	\$0	\$0	0			d
B. Required Activities																	
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	53	0	640	64	32	\$60,778	\$1,086,622.46	53	18,067		e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	394	67,631	0	0	0	\$3,371,675	\$714,743	0			a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	394	189,127	0	0	0	\$9,428,740	\$80,379	0			a, g
C. Create Information	Included in 3B																
D. Gather Information	Included in 3B																
E. Report Preparation																	
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0			h
2. Amended design capacity report	2	\$0		1	0	2	23	0	46	5	2	\$4,395	\$0	23			i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	45	0	360	36	18	\$34,141	\$0	45			j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	0	0	0	0	0	\$0	\$198,805	0	10,067		j, k
5. Landfill Closure Report	1	\$0		1	0	1	12	0	12	1	1	\$1,132	\$0	12			l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0			m
7. Collection and Control System Design Plan	80	\$0		1	0	80	53	0	4,267	427	213	\$405,186	\$0	53			f
8. Revised design plan	20	\$0		1	0	20	5	0	107	11	5	\$10,130	\$0	5			n
9. Initial Performance Test	Included in 3B																
10. Compliance Report	Included in 3B																
11. Annual Report	27	\$0		1	0	27	394	0	10,638	1,064	532	\$1,010,188	\$0	394			o
Reporting Subtotal								256,758	16,070	1,607	803	\$14,326,365	\$2,080,549	586	\$28,134		
4. Recordkeeping Requirements																	
A. Read Instructions	Included in 3a																
B. Plan Activities	na																
C. Implement Activities	na																
D. Develop Record System	na																
E. Record Information																	
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	394	0	23,641	2,364	1,182	\$2,244,861	\$0	0			p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	394	0	52,010	5,201	2,600	\$4,938,695	\$0	0			p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	251	0	1,002	100	50	\$95,183	\$0	0			q
E. Personnel Training	na																
F. Time for Audits	na																
Recordkeeping Subtotal								0	76,653	7,665	3,833	\$7,278,739	\$0	0	\$0		
Totals								256,758	92,723	9,272	4,636	\$21,605,104	\$2,080,549	586	\$28,134		

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one time requirement for new respondents. We have assumed that all new open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject there requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.
- e
- f Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- g We have assumed that 93 controlled open landfills will be subject to this requirement during the third year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmittal of the GCCS design plan.
- h Assumes 598 controlled landfills during the second year of this ICR period, 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- i All additional landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume were estimated to complete the one-time initial design capacity report in the first year of this ICR - no respondents in years 2&3.
- j Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.381(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

**Table 3.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for publically-owned Municipal Solid Waste Landfills - Subpart Cf - Year 3, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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^j We have assumed that 50 percent of uncontrolled open landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.

^k Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.

^l We have assumed that 20 controlled landfills will close during the third year of the ICR period. This is based on the closure dates reported in the regulatory database.

^m We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.

ⁿ We have assumed that 10% of controlled landfill will revise their design plan.

^o Assumes 687 controlled landfills during the third year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

^p Assumes 687 controlled landfills during the third year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

^q Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

Table 3.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 3, Proposed Option 2.5/34

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements																
1. Open or controlling landfills	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0		d
2. Closed uncontrolled landfills and other small landfills	10	\$0		1	0	10	0	0	0	0	0	\$0	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	40	0	476	48	24	\$45,194	\$808,001.31	40	18,067	e, f
2. Surface methane monitoring quarterly	43	\$454		4	172	0	293	50,290	0	0	0	\$2,507,143	\$531,475	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	1	293	140,633	0	0	0	\$7,011,115	\$59,769	0		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Amended design capacity report	2	\$0		1	0	2	3	0	7	1	0	\$657	\$0	3		i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	16	0	124	12	6	\$11,818	\$0	16		j
4. Report of NMOC rate (Tier 2)	12	\$2,455		1	0	12	0	0	0	0	0	\$0	\$68,817	0	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	8	0	8	1	0	\$767	\$0	8		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		m
7. Collection and Control System Design Plan	80	\$0		1	0	80	40	0	3,173	317	159	\$301,292	\$0	40		f
8. Revised design plan	20	\$0		1	0	20	4	0	79	8	4	\$7,532	\$0	4		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	293	0	7,911	791	396	\$751,165	\$0	293		o
Reporting Subtotal								190,923	11,778	1,178	589	\$10,636,683	\$1,468,063	403	\$28,134	
4. Recordkeeping Requirements																
A. Read Instructions	Included in 3a															
B. Plan Activities	na															
C. Implement Activities	na															
D. Develop Record System	na															
E. Record Information																
1. Data Compilation and Review (controllers)	5	\$0		12	0	60	293	0	17,579	1,758	879	\$1,669,256	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	293	0	38,674	3,867	1,934	\$3,672,363	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	50	0	202	20	10	\$19,145	\$0	0		q
E. Personnel Training	na															
F. Time for Audits	na															
Recordkeeping Subtotal								0	56,455	5,645	2,823	\$5,360,764	\$0	0	\$0	
Totals								190,923	68,233	6,823	3,412	\$15,997,447	\$1,468,063	403	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, and Office Clerks, General for Clerical labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Includes only responses that are submitted as reports.
- d Number of occurrences is based on the total number of landfills that are subject to the standard. This is a one-time requirement for new respondents. We have assumed that all new open or controlled landfills will take 40 hours to read instructions as part of their reporting requirements. While other closed and smaller landfills are subject there requirements are very minimal and their time to read the rule would be much less. Based on the regulatory database, 61% of these respondents are public and 39% are private.
- e Based on the annualized capital costs for method 25, 25A, or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f We have assumed that 93 controlled open landfills will be subject to this requirement during the third year of this ICR period. 57% of which are public and 43% of which are private. This is a one-time requirement. Closed landfills with controls are exempt from the performance test or resubmittal of the GCCS design plan.
- g Assumes 598 controlled landfills during the second year of this ICR period, 57% of which are public and 43% of which are private. The average acreage of controlled sites is estimated to be 169 acres under the proposed 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h All additional landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume were estimated to complete the one-time initial design capacity report in the first year of this ICR - no respondents in years 2&3.
- i Subpart Cf applies to each existing MSW landfill for which construction, reconstruction, or modification was commenced before July 17, 2014. Modification means an increase in the permitted volume design capacity of the landfill by either lateral or vertical expansion based on its permitted design capacity as of July 17, 2014. Modification does not occur until the owner or operator commences construction on the horizontal or vertical expansion. According to Subpart Cf (60.38f(b)) These landfills would submit an amended report within 90 days of receiving a permitted increase in volume. But, once the landfill commences construction on the permitted increase in volume these landfills would be modified and become subject to Subpart XXX instead of Subpart Cf. Estimate of landfills with a change in design capacity is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified. 60% of these respondents are public and 40% are private.

**Table 3.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Emission Guidelines
for privately-owned Municipal Solid Waste Landfills - Subpart Cf - Year 3, Proposed Option 2.5/34**

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start- up Costs per occurrence	Footnotes
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- j We have assumed that 50 percent of uncontrolled open landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 74% are public and 26% are private.
- k Based on the annualized labor and capital costs for method 25, 25A, or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that 20 controlled landfills will close during the third year of the ICR period. This is based on the closure dates reported in the regulatory database.
- m We have assumed that no landfills will remove equipment during this ICR period. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- n We have assumed that 40% of uncontrolled open landfills will use Tier 1 calculations annually and 60% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- o Assumes 687 controlled landfills during the third year of this ICR period. 57% of which are public and 43% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of all landfills that are subject to the standard that are not controlling. Based on the regulatory database, 65% of these respondents are public and 35% are private.

Table C.1. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for Municipal Solid Waste Landfills - Subpart Cf - Year 1, Proposed Option 2.5/34

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^m	Footnotes
1. Read and understand rule requirements	40	10	400	400	20	40	\$21,145	a
2. Enter and update information into agency recordkeeping system	2	988	1,976	1,976	99	198	\$104,456	b
3. Required activities								
A. Observe initial performance test	12	108	1,291	1,291	65	129	\$68,256	c, d
B. Observe surface methane monitoring quarterly	20	130	2,596	2,596	130	260	\$236,398	c
C. Review operating parameters	1	538	538	538	27	54	\$28,440	d
D. Review continuous parameter monitoring	1	649	649	649	32	65	\$34,308	e
E. Review notification of performance test	2	538	1,076	1,076	54	108	\$56,880	d
4. Excess Emissions Enforcement Activities	24	54	0	0	0	0	\$0	f
5. Reporting requirements								
A. Review initial design capacity report	1	203	203	203	10	20	\$10,731	g
B. Review amended design capacity report	1	27	27	27	1	3	\$1,406	h
C. Review annual NMOC emission rate report	2	218	436	436	22	44	\$23,048	i
D. Review landfill closure report	1	23	23	23	1	2	\$1,216	j
E. Review equipment removal report	1	0	0	0	0	0	\$0	k
F. Review Collection and Control System Design Plan	15	538	8,070	8,070	404	807	\$426,600	d
G. Review Revised Collection and Control System Design Plan	5	54	269	269	13	27	\$14,220	l
H. Review Initial Performance Test	12	538	6,456	6,456	323	646	\$341,280	d
I. Review Annual Report	2	649	1,298	1,298	65	130	\$68,615	e
6. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip						\$267,787	n
TOTAL BURDEN AND COST (SALARY)				25,308	1,265	2,531	\$1,704,785	
TOTAL ANNUAL HOURS						29,104		

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

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

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$764 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of controlled open landfills in the first year of the ICR. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of all controlled landfills in the first year of the ICR.

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

g Based on the regulatory database, there are 203 existing open landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement.

h Number of occurrences is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified.

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

j Based on the estimated number of landfills closing in the first year of this ICR, according to the regulatory database.

k We have assumed that no landfills will remove equipment during this ICR period.

l Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.38f(e).

m Assumes the following labor rates: \$63.52 per hour for Management labor; \$47.14 per hour for Technical labor, and \$25.50 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

n Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

**Table C.2. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart Cf - Year 2, Proposed Option 2.5/34**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes	
1. Read and understand rule requirements	40	0	0	0	0	0	\$0	a	
2. Enter and update information into agency recordkeeping system	2	988	1,976	1,976	99	198	\$104,456	b	
3. Required activities									
A. Observe initial performance test	12	1	10	10	0	1	\$507	c, d	
B. Observe surface methane monitoring quarterly	20	120	2,392	2,392	120	239	\$217,821	c	
C. Review operating parameters	1	4	4	4	0	0	\$211	d	
D. Review continuous parameter monitoring	1	598	598	598	30	60	\$31,612	e	
E. Review notification of performance test	2	4	8	8	0	1	\$423	d	
4 Excess Emissions Enforcement Activities	24	0	0	0	0	0	\$0	f	
5. Reporting requirements									
A. Review initial design capacity report	1	0	0	0	0	0	\$0	g	
B. Review amended design capacity report	1	27	27	27	1	3	\$1,406	h	
C. Review annual NMOC emission rate report	2	107	214	214	11	21	\$11,313	i	
D. Review landfill closure report	1	26	26	26	1	3	\$1,374	j	
E. Review equipment removal report	1	0	0	0	0	0	\$0	k	
F. Review Collection and Control System Design Plan	15	4	60	60	3	6	\$3,172	d	
G. Review Revised Collection and Control System Design Plan	5	0	2	2	0	0	\$106	l	
H. Review Initial Performance Test	12	4	48	48	2	5	\$2,537	d	
I. Review Annual Report	2	598	1,196	1,196	60	120	\$63,223	e	
6. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip							\$135,811	n
TOTAL BURDEN AND COST (SALARY)				6,560	328	656	\$573,974		
TOTAL ANNUAL HOURS						7,544			

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

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

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$764 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of additional controlled open landfills in the second year of the ICR. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of all controlled landfills in the second year of the ICR.

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

g Based on the regulatory database, no additional existing landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report will report in the second year of this ICR. This is a one-time requirement and the small open landfills were assumed to report in the first year of the ICR.

h Number of occurrences is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified.

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

j Based on the estimated number of landfills closing in the second year of this ICR, according to the regulatory database.

k We have assumed that no landfills will remove equipment during this ICR period.

l Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.38f(e).

m Assumes the following labor rates: \$63.52 per hour for Management labor; \$47.14 per hour for Technical labor, and \$25.50 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

n Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

**Table C.3. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart Cf - Year 3, Proposed Option 2.5/34**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes
1. Read and understand rule requirements	40	0	0	0	0	0	\$0	a
2. Enter and update information into agency recordkeeping system	2	988	1,976	1,976	99	198	\$104,456	b
3. Required activities								
A. Observe initial performance test	12	19	223	223	11	22	\$11,799	c, d
B. Observe surface methane monitoring quarterly	20	137	2,748	2,748	137	275	\$250,239	c
C. Review operating parameters	1	93	93	93	5	9	\$4,916	d
D. Review continuous parameter monitoring	1	687	687	687	34	69	\$36,316	e
E. Review notification of performance test	2	93	186	186	9	19	\$9,832	d
4 Excess Emissions Enforcement Activities	24	9	0	0	0	0	\$0	f
5. Reporting requirements								
A. Review initial design capacity report	1	0	0	0	0	0	\$0	g
B. Review amended design capacity report	1	27	27	27	1	3	\$1,406	h
C. Review annual NMOC emission rate report	2	61	121	121	6	12	\$6,396	i
D. Review landfill closure report	1	20	20	20	1	2	\$1,057	j
E. Review equipment removal report	1	0	0	0	0	0	\$0	k
F. Review Collection and Control System Design Plan	15	93	1,395	1,395	70	140	\$73,743	d
G. Review Revised Collection and Control System Design Plan	5	9	47	47	2	5	\$2,458	l
H. Review Initial Performance Test	12	93	1,116	1,116	56	112	\$58,994	d
I. Review Annual Report	2	687	1,374	1,374	69	137	\$72,633	e
6. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip						\$175,968	n
TOTAL BURDEN AND COST (SALARY)				10,012	501	1,001	\$810,216	
TOTAL ANNUAL HOURS						11,514		

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

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

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$764 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of additional controlled open landfills in the third year of the ICR. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of all controlled landfills in the third year of the ICR.

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

g Based on the regulatory database, no additional existing landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report will report in the second year of this ICR. This is a one-time requirement and the small open landfills were assumed to report in the first year of the ICR.

h Number of occurrences is based on the number of landfills that reported recent modifications or were anticipated to modify during the period of 2014-2018. See: Summary of Landfill Dataset Used in the Cost and Emission Impacts Analysis of Landfill Regulations for more discussion of how modified landfills were identified.

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

j Based on the estimated number of landfills closing in the third year of this ICR, according to the regulatory database.

k We have assumed that no landfills will remove equipment during this ICR period.

l Assumes 10 percent of respondents submitting a design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.38f(e).

m Assumes the following labor rates: \$63.52 per hour for Management labor; \$47.14 per hour for Technical labor, and \$25.50 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2014/general-schedule/>.

n Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>