

**SUPPORTING STATEMENT FOR  
LANDFILL METHANE OUTREACH PROGRAM,  
EPA INFORMATION COLLECTION REQUEST NUMBER 1849.07**

**January 2016**

## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title of the Information Collection**

This renewal information collection is entitled “Landfill Methane Outreach Program,” ICR number 1849.07, OMB Control Number 2060-0446.

### **1(b) Short Characterization/Abstract**

The Landfill Methane Outreach Program (LMOP), created by EPA as part of the United States’ commitment to reduce greenhouse gas (GHG) emissions under the United Nations Framework Convention on Climate Change, is a voluntary program designed to encourage and facilitate the development of environmentally and economically sound landfill gas (LFG) energy projects across the United States in order to reduce methane emissions from landfills. LMOP does this by educating local governments and communities about the benefits of LFG recovery and use; building partnerships between state agencies, industry, energy service providers, local communities, and other stakeholders interested in developing this valuable resource in their community; and providing tools to evaluate LFG energy potential.

To continue to be successful it is critical that LMOP gather information from its Partners about their activities and how the program can improve its support to them. Additionally, for LMOP to improve the data quality in one of its critical program tools, the LMOP Landfill and LFG Energy Project Database (LMOP Database), LMOP must gather basic physical and operational data from municipal solid waste (MSW) landfills without LFG energy projects. Improving the data quality in this tool will enable LMOP to identify landfills that are good candidates for LFG energy projects, improve estimates of methane emissions from landfills, and help LMOP and its Partners prioritize LFG energy project development assistance activities.

Partners are entities that have volunteered to participate in LMOP. LMOP classifies these Partners into one of five categories: Community Partners, State Partners, Industry Partners, Energy Partners, and Endorsers. There are three general categories of information collected from the Partners:

- Electronic memoranda of understanding (MOU);
- Basic information on LFG energy projects and MSW landfills with which the organization is involved (LFG energy project and landfill data); and
- Electronic periodic information updates.

Currently, EPA is evaluating other electronic methods for collecting this information such

as providing the data through a secure online system. It is anticipated that an electronic system would decrease the burden for submitting data by improving the efficiency of collecting the data.

The LMOP information collection is expected to involve an average of 1,135 existing Partners and an additional 25 new Partners per year.

This ICR provides a comprehensive description of the information collections under LMOP. Sections 1 through 5 of this ICR describe the specific information collections (e.g., from the standpoint of need, use, and respondent activities). In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency under these collections.

## **2. NEED FOR AND USE OF THIS COLLECTION**

### **2(a) Need/Authority for the Collection**

EPA needs to collect the information in the MOU to formally establish participation in LMOP and to obtain general information about new Partners. Additional LFG energy project and landfill data collected from certain types of Partners is needed to allow EPA to track, facilitate, and encourage the implementation of LFG energy projects. This information collection will assist LMOP in decreasing methane emissions from landfills, increasing the use of methane as a renewable energy resource, and reducing emissions due to the burning of non-renewable energy resources such as coal and fuel oil.

All participants, in completing the MOU, agree to provide EPA with information requested in the MOU and provide contact information for LMOP. Industry Developer and Energy Partners agree to provide information on LFG energy projects with which they have been involved. Community Partners agree to provide information on the progress of implementing LFG energy projects at their landfill(s).

### **2(b) Practical Utility/Users of the Data**

EPA uses information submitted in the MOU to update its database of LMOP Partners. The database serves as a source of general information and an electronic mailing list. EPA uses LFG energy project and landfill data submitted by Industry Developer, Energy, and Community Partners to monitor the progress of LFG energy projects and identify opportunities for new projects. EPA also uses the data to update the LMOP Database, which is used to prepare reports on LFG energy projects and the progress of LMOP. EPA uses case studies of successful LFG energy projects to demonstrate to existing and potential Partners the cost savings and

environmental benefits associated with capturing and using LFG. General information about the Partners, operational and under construction LFG energy projects, and landfills that may have potential for developing LFG energy projects is also provided on the LMOP website, making it available to other LMOP Partners as well as the public. During EPA fiscal year 2015, LMOP processed approximately 30 data requests from the public that required accessing data in the LMOP Database.

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Nonduplication**

For new Partners, the information to be collected has not previously been collected by EPA or any other Federal Agency. For existing Partners with LFG energy projects, some of the information requested may be available in the existing LMOP Database. To avoid requesting information that has already been collected, data update requests sent to existing Partners are pre-populated with information from the LMOP Database. If EPA decides to pursue electronic reporting of the data, then EPA plans to follow a similar approach. Recipients of the data update request or users of the electronic reporting system will be asked to review the information provided (if available). Only if the information is incorrect or out of date will the recipients be requested to provide updated or additional information.

EPA began annually collecting certain technical and informational data from MSW landfills under the Greenhouse Gas Reporting Program (GHGRP) 40 CFR part 98, subpart HH in 2011. Where data fields overlap (e.g., landfill open and closure years, landfill design capacity, amount of LFG collected), EPA updates the LMOP Database with data from the GHGRP. Where LMOP Partners and those entities covered under GHGRP, subpart HH, are the same organizations, LMOP does not request the same data. As stated above, LMOP pre-populates the data fields with applicable data from GHGRP, subpart HH.

#### **3(a) Public Notice Required Prior to ICR Submission to OMB**

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on October 9, 2015 (80 FR 61210). The Agency received comment from one entity on this ICR renewal. The comment received was out of scope and not related to the ICR renewal.

### **3(c) Consultations**

In 2015, LMOP attempted to contact fewer than nine Partners regarding the burden of this information collection, in regards to the current methodology of collecting landfill and LFG energy project data. The Partners contacted agreed that the estimated burden by Partner type is what they would expect for this effort or the amount they expect is less than the estimate.

**Table 1: List of Partner Consultations Made in 2015**

<b>Partner Type</b>	<b>Contact Person, Organization</b>	<b>Phone Number</b>
Industry Partner, developer	Luke Morrow, Morrow Renewables, LLC	432-563-0447
Energy Partner	Brian Patillo, Lockhart Power Company	864-545-2211
Community Partner	Pantelis Panteli, Chautauqua County, NY	716-985-4785 ext. 202
Community Partner	Rick Buller, Jefferson Parish Department of Environmental Affairs, LA	504-736-6103

### **3(d) Effects of Less Frequent Collection**

The MOU are submitted once by organizations that choose to become Partners of LMOP. To allow EPA to remain current on LFG energy projects, Industry Developer, Energy, and Community Partners directly involved in projects will be asked annually to update their LFG energy project and landfill data. All Partners may also update company and contact information periodically as needed. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program, facilitate LFG energy project implementation, and respond in a timely manner to needs of the Partners.

### **3(e) General Guidelines**

This collection of information complies with OMB's general guidelines

### **3(f) Confidentiality**

Participants are not required to reveal confidential business information. Additionally, participants are given specific instructions to not provide any information that they consider confidential.

### **3(g) Sensitive Questions**

No questions of a sensitive nature are asked in the MOU, requests for LFG energy project and landfill data, or periodic information updates.

#### 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

##### 4(a) Respondent NAICS Codes

This information collection will encompass a wide variety of respondents. Community Partners include local agencies and municipalities that own landfills. State agencies involved in energy, air pollution, and solid waste management are represented through State Partners. Industry Partners include engine and turbine manufacturers, engineering firms, construction companies, environmental consultants, and other companies involved in the logistics of developing LFG energy projects such as law firms and financing companies. Industry Partners are further divided into two groups: (1) developers are organizations that facilitate, finance, and implement LFG energy projects; (2) non-developers are manufacturers or suppliers of equipment or expertise needed to collect and utilize LFG. Energy Partners include utility companies who purchase energy generated from landfills, power marketers, and direct end users of energy from the landfill. The direct end user category is potentially the most diverse category. Any facility located near a landfill that utilizes fuel either in manufacturing products or in heating the facility is a potential LFG end user. Finally, Endorsers are non-profit organizations coordinating with EPA to publicize and promote the use of LFG among their members or constituents. These include several trade associations representing the solid waste industry, public works, municipalities, and renewable energy. Table 2 provides the North American Industry Classification System (NAICS) code and description for the respondents.

**Table 2: Respondents to Information Collection**

Partner Type	NAICS Code	NAICS Description
Community Partners and State Partners	924	Public Administration, Administration of Environmental Quality Programs
	924110	Public Administration, Administration of Air and Water Resource and Solid Waste Management Programs
	926130	Public Administration, Regulation and Administration of Communications, Electric, Gas, and Other Utilities
Industry Partners	333611	Turbine and Turbine Generator Set Units Manufacturing
	333618	Other Engine Equipment Manufacturing
	522110	Commercial Banking
	523910	Financial Investments and Related Activities, Miscellaneous Intermediation
	541110	Offices of Lawyers
	541330	Engineering Services
	541620	Environmental Consulting Services

Partner Type	NAICS Code	NAICS Description
	562212	Administrative and Support and Waste Management and Remediation Services, Solid Waste Landfill
<b>Energy Partners</b>		
<i>Direct users<sup>a</sup></i>	221210	Natural Gas Distribution
	312120	Breweries
	314110	Carpet and Rug Mills
	322291	Sanitary Paper Product Manufacturing
	325193	Ethyl Alcohol Manufacturing
	329199	All Other Basic Organic Chemical Manufacturing
	325212	Synthetic Rubber Manufacturing
	325412	Pharmaceutical Preparation Manufacturing
	325414	Biological Product (except Diagnostic) Manufacturing
	327120	Clay Building Material and Refractories Manufacturing
	327310	Cement Manufacturing
	336111	Automobile Manufacturing
	336120	Heavy Duty Truck Manufacturing
611310	Colleges, Universities, and Professional Schools	
<i>Power marketers and utilities</i>	221121	Electric Bulk Power Transmission and Control
	221122	Electric Power Distribution
	221118	Other Electric Power Generation
Endorsers	813910	Business Associations

a. There is a wide variety of entities that could become direct LFG users. Any facility near a landfill that uses fuel is a potential direct user. A subset of the NAICS codes and descriptions from current direct energy users who are LMOP Partners are included in Table 2.

#### **4(b) Information Requested**

##### **(i) Data Items, Including Recordkeeping Requirements**

Information will be collected in MOU, requests for LFG energy project and landfill data, and through periodic updates. The MOU request the following information from all Partners:

- Name of the organization;
- Signature, including electronic signature, of authorized representative with authorized representative's printed name and the date of the signature;
- Information about the primary contact person including name, title, address, phone number, fax number, and email address;
- Brief description of the organization;
- Organization's website address; and
- A camera-ready copy of the organization's logo or seal.

Requests for LFG energy project and landfill data are sent to Industry Developer, Energy, and Community Partners to update existing critical LFG energy project data necessary for tracking GHG reductions from LFG energy projects, such as project size and start year.

All Partners may provide information through periodic updates as needed. These updates will mainly be changes to contact information for primary contacts and experts, but they can also include providing or updating a brief description of the organization which LMOP will post on the LMOP website to provide publicity and encourage networking among Partners. LMOP may also call or email a selection of Partners to confirm or update project information that LMOP has received through the media or industry contacts.

Participation in LMOP does not require any records to be kept, although Partners will likely keep copies of MOU and LFG energy project and landfill data updates submitted to EPA.

**(ii) Respondent Activities**

The respondent activities depend on the aspect of the information collection to which they are responding. In completing the MOU, respondents will:

- Review the MOU;
- Complete the MOU online or in hardcopy;
- Sign and submit the form electronically or in hardcopy to EPA; and
- File a copy of the MOU.

In completing the request for LFG energy project and landfill data, respondents will:

- Review request and instructions;
- Gather information;
- Complete or update information;
- Email or mail the information to EPA (if EPA pursues electronic reporting, data will be requested and submitted electronically); and
- File a copy of their submission.

In replying to or initiating an information update, respondents will:

- Gather information; and
- Provide information via the LMOP website, email, or telephone interview.

**5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**



### **5(a) Agency Activities**

Agency activities associated with this information collection depend on the aspect of the information collection that the agency has received. In receiving the MOU, the Agency will:

- Review the information provided;
- Sign the MOU;
- Return a copy of the signed MOU to the Partner;
- Enter the information into a database; and
- File the MOU.

In requesting and receiving LFG energy project and landfill data, the Agency will:

- Include existing landfill and/or project data specific to the Partner in the request, if available, and send the request via email;
- Review the information provided and follow up if necessary;
- Enter information into a database; and
- File the information.

If the Agency pursues electronic reporting for LFG energy project and landfill data updates, it will:

- Include existing landfill and/or project data specific to the Partner in the request, if available, and send the request through the electronic reporting system;
- Review the information provided and follow up if necessary; and
- Enter information into a database.

In receiving an information update from a Partner, the Agency will:

- Review the data; and
- Revise data in the database based on the update.

In initiating an information update, the Agency will:

- Call or email the Partner;
- Request updated information; and
- Revise data in the database based on the updates.

### 5(b) Collection Methodology and Management

The methods selected for this information collection are chosen based on efficiency and minimization of burden for respondents and EPA. The MOU can be accessed on the LMOP website and returned to EPA either by email, or submitted electronically via the website. General Partner information will be posted on the LMOP website where it can be reviewed for accuracy by the Partner and revised if necessary. LFG energy project and landfill data update requests will be sent to all Industry Developer, Energy, and Community Partners. All LFG energy project and landfill data updates received will be reviewed by EPA before being entered into the LMOP Database.

### 5(c) Small Entity Flexibility

EPA expects that some LMOP Partners are small entities. Consistent with the assumptions made in the previous ICR renewal, LMOP assumed that all State Partners, which represent State governments, are not classified as small entities since each State population is greater than 50,000. LMOP also assumed that any new Endorsers, which are non-profits, that join the program will be classified as small entities. Given the larger number of Partners in other categories, for existing Endorsers and existing and new Community, Energy, and Industry Partners, LMOP estimated small entity counts for this ICR renewal based on the distribution of small entities for each Partner type from the 2012 ICR renewal. The results of this estimation are provided in Table 3.

**Table 3: Estimate of Average Annual Small Entities for Each Respondent Category**

<b>Respondent Category</b>	<b>New</b>	<b>% of Total Category</b>	<b>Existing</b>	<b>% of Total Category</b>
State Partners	0	0%	0	0%
Community Partners	0	14%	20	14%
Endorsers	1	100%	33	85%
Energy	1	25%	27	24%
Industry Partner, developers	1	67%	44	66%
Industry Partner, non-developers	9	54%	228	31%
Total	12		352	

EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. Participation in LMOP is voluntary. Any small entity that finds the information collection overly burdensome is not required to participate.

#### **5(d) Collection Schedule**

EPA will collect general information in the MOU, which are completed and submitted by each Partner upon their agreement to participate in the program. EPA will collect additional information through requests for updates to LFG energy project and landfill data. These update requests will be completed annually by Industry Developer, Energy, and Community Partners. Information may also be updated periodically at the request of EPA or the Partner.

### **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

#### **6(a) Estimating Respondent Burden**

In order to obtain accurate hourly burden and cost estimates, EPA consulted with fewer than nine Partners regarding burden and cost assumptions in 2007, 2008, 2012, and 2015. For this renewal ICR, cost estimates were increased to account for an increase in wages and the number of Partners. The hourly burden estimates for Industry Developer, Energy, and Community Partners remained the same as in the 2012 renewal because the data collection methodology and number of data fields is very similar to the 2012 renewal. Attachment A presents the estimated average annual Partner respondent burden and costs during the next 3-year ICR period for each type of Partner. Table 4 presents a summary of the respondent burden.

#### **6(b) Estimating Respondent Costs**

##### **(i) Estimating Labor Costs**

For private-sector respondents (Industry and Energy Partners), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$142.68 for legal staff, \$131.13 for managerial staff, \$89.47 for technical staff, and \$58.42 for clerical staff. Legal, managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Professional, Scientific, and Technical Services (NAICS code 541000). Legal rates were based on lawyers, management wages were based on managers (all other), technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants for May 2014. A June 2015 labor rate for all rates was estimated by applying a 1.3% growth factor from the Employment Cost Index to account for increases in wages from June 2014 to June 2015. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at <http://www.bls.gov/news.release/eci.t02.htm>.

For public-sector respondents (Community and State Partners), EPA used the same labor

rates used for EPA personnel (see Section 6(c)). These rates are comparable to rates provided by a Community Partner in 2000 and using them for all public-sector employees provides consistency.

For non-profit sector respondents (Endorsers), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$110.91 for managerial staff, \$97.29 for technical staff, and \$56.66 for clerical staff. Managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Business, Professional, Labor, Political, and Similar Organizations (NAICS code 813900). Management wages were based on managers (all other), technical wages were based on engineers (all other), and clerical rates were based on executive secretaries and administrative assistants for May 2014. A June 2015 labor rate for all rates was estimated by applying a 2.0% growth factor from the Employment Cost Index to account for increases in wages from June 2014 to June 2015. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at <http://www.bls.gov/news.release/eci.t02.htm>.

**(ii) Estimating Capital and Operations and Maintenance Costs**

Because this information collection requires respondents only to report information that is already available to them, there are no capital costs. Similarly, EPA does not expect any operations and maintenance (O&M) costs for postage under this information collection as all responses are expected to be submitted by email or other electronic submittal.

**Table 4: Summary of Respondent Burden**

		New	Existing	
Partner		Average Annual Burden		Total for 3-year ICR Period
Hours	Community	22.0	670.0	2,076
	Endorser	1.5	7.5	27
	Industry Non-Developer	42.0	457.5	1,499
	Energy and Industry-Project Developer	36.5	1,276.0	3,938
	State	1.5	7.5	27
	<b>Total Hours</b>	<b>103.5</b>	<b>2,418.5</b>	<b>7,566</b>
	<b>Average Burden per Partner</b>	<b>4.14</b>	<b>2.13</b>	--
Cost	Partner			
	Community	\$1,105	\$32,935	\$102,119
	Endorser	\$132	\$730	\$2,586
	Industry Non-Developer	\$4,268	\$40,934	\$135,608
	Energy and Industry Project Developer	\$3,352	\$112,338	\$347,070
	State	\$76	\$401	\$1,431
	12			

	<b>Total Cost</b>	<b>\$8,935</b>	<b>\$187,337</b>	<b>\$588,815</b>
	<b>Average Cost per Partner</b>	<b>\$357</b>	<b>\$165</b>	<b>--</b>

### 6(c) Estimating Agency Burden and Costs

Attachment B presents the estimated Agency burden hours and costs for the information collection activities associated with LMOP. Table 5 presents a summary of the agency burden. EPA estimates an average hourly labor cost (labor plus 60% for overhead) of \$77.92 for managerial staff, \$53.42 for technical staff, and \$21.46 for clerical staff. To derive these estimates, EPA used the “Salary Table 2015 - GS” from the Department of Personnel Management, available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS_h.pdf). For purposes of this ICR, EPA assigned staff the following government service levels:

- Managerial Staff - GS-15, Step 1
- Technical Staff - GS-12, Step 5
- Clerical Staff - GS-5, Step 1

**Table 5: Summary of Agency Burden**

	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Average</b>	<b>Total</b>
Hours	1,110	1,123	1,137	1,123	<b>3,370</b>
Cost	\$59,054	\$59,762	\$60,470	\$59,762	<b>\$179,286</b>

### 6(d) Estimating the Respondent Universe

The growth in new LMOP Partners joining the program has slowed significantly since the last ICR renewal. EPA estimates during the next 3-year ICR period that 25 new Partners will join the program per year and 10 Partners will leave the program per year, for a net increase of 15 Partners per year. Table 6 presents a summary of the respondent universe by LMOP Partner category for the next 3-year ICR period. The burden estimates are based on the total respondent universe. The historical response rates to previous LMOP ICRs are approximately 25%.

**Table 6: Summary of LMOP Partners and Other Respondents**

<b>Partner<sup>1</sup></b>	<b>2016</b>		<b>2017</b>		<b>2018</b>		<b>Average</b>	
	<b>Existing</b>	<b>New</b>	<b>Existing</b>	<b>New</b>	<b>Existing</b>	<b>New</b>	<b>Existing</b>	<b>New</b>
Community	143	3	145	3	147	3	145	3
Endorser	39	1	39	1	39	1	39	1
Energy	112	2	113	2	114	2	113	2
Industry								
Non-Developer	721	16	731	16	741	16	731	16
Project Developer	65	2	66	2	67	2	66	2
State			13					1

	2016		2017		2018		Average	
	40	1	41	1	42	1	41	
<b>TOTAL</b>	<b>1,120</b>	<b>25</b>	<b>1,135</b>	<b>25</b>	<b>1,150</b>	<b>25</b>	<b>1,135</b>	<b>25</b>

1 Staff with experience in managing the LMOP Partner database provided insight on future program growth by Partner category. The number of new Partners joining LMOP per year has declined in recent years and this trend is expected to continue. 54 new Partners joined in 2012, 45 new Partners joined in 2013, and 30 new Partners joined in 2014. The majority of existing and new Partners are Industry-NonDeveloper.

The number of average annual responses is 646, as detailed in Table 7.

**Table 7: Summary of Average Annual Responses**

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
				$E=(B \times C)+D$
MOUs	25	1	N/A	25
Information Updates	290	1	N/A	290
LFG energy project and landfill data updates	331	1	N/A	331
			<b>Total</b>	<b>646</b>

**6(e) Bottom Line Burden Hours and Costs**

Over the 3-year period covered by this ICR, EPA estimates the total respondent burden of the program to be 7,566 hours at a labor cost of \$588,815. EPA estimates the total Agency burden to be 3,370 at a labor cost of \$179,286. The annual respondent burden, averaged over the 3-year period, is 2,522 hours at a labor cost of \$196,272, and the annual Agency burden, averaged over the 3-year period, is 1,123 hours at a labor cost of \$59,762.

The total burden for existing Partner respondents will increase gradually over each year of the 3-year ICR period to reflect an increase in the total number of existing Partners, although the burden per respondent will remain constant. The burden and costs shown for each existing Partner

category in Attachment A reflect the average number of Partners during the 3-year ICR period. The bottom line burden for new Partners will stay the same for each year of this ICR, since the number of new Partners joining each year is expected to remain relatively constant over the 3-year ICR period.

#### **6(f) Reasons for Change in Burden**

Under this renewal ICR, the total respondent burden over the 3-year period is 7,566 hours, or an average of 2,522 hours per year. The 2012 ICR total respondent burden was 12,645 hours, or an average of 4,215 hours per year.

A significant reason for the decrease in total hourly burden is that under the last ICR renewal, LMOP estimated a larger number of new Partners (113) joining the Program each year of the 3-year ICR period than is estimated (25) under this current ICR renewal. For perspective on the slowing of Partner growth, 54 new Partners joined the Program in 2012, 45 new Partners joined the Program in 2013, and 30 new Partners joined the Program in 2014. Given the maturity of the LFG energy industry and recent data trends for new LMOP Partners, the Agency anticipates a lower number of Partners to join in the next three years.

To a lesser magnitude than the decrease discussed above, there is a decrease in total hourly burden for Partners as LMOP estimates that only one-fourth of all Partners will submit a voluntary, periodic information update per year under the current ICR renewal, whereas it was estimated under the last ICR renewal that one-half of all Partners would do so. This change is based on the historical rate of periodic information update submittals by Partners.

Lastly, the O&M costs for this renewal (\$0 per year) are lower than those (\$34 per year) in the previous renewal. Based on recent historical submittals of MOU by new Partners via electronic methods, LMOP estimated that no O&M (postage) costs will be incurred by new Partners of any type.

#### **6(g) Burden Statement**

The overall annual public reporting and recordkeeping burden for this collection of information is estimated to average 4 hours per response.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, and disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15. The burden for each type of Partner is shown in Attachment A and the total burden is summarized in Table 4.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID EPA-HQ-OAR-2003-0078. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA WJC West Building, Room 3334, 1301 Constitution Ave., NW, Washington, D.C. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding federal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Air and Radiation Docket is 202-566-1742.

Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2003-0078 and OMB Control Number 2060-0446 in any correspondence.

## **Part B of the Supporting Statement**

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



**ATTACHMENT A - ESTIMATED AVERAGE RESPONDENT BURDEN AND COST**

A-1 Existing State Partners

A-2 New State Partners

A-3 Existing Endorsers

A-4 New Endorsers

A-5 Existing Industry Non-Developer Partners

A-6 New Industry Non-Developer Partners

A-7 Existing Community Partners

A-8 New Community Partners

A-9 Existing Energy and Industry-Project Developer Partners

A-10 New Energy and Industry-Project Developer Partners

**ATTACHMENT B - ESTIMATED AGENCY BURDEN AND COST**

B-1 Agency Burden 2016

B-2 Agency Burden 2017

B-3 Agency Burden 2018