SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal), EPA ICR Number 1938.07, OMB Control Number 2060-0505.

1(b) Short Characterization/Abstract

The NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) were proposed on November 7, 2000, promulgated on January 16, 2003, and most-recently amended April 20, 2006. These regulations apply to existing and new municipal solid waste (MSW) landfills that have accepted waste since November 8, 1987 or have additional capacity for waste deposition, including those that operate as bioreactors, and the landfill either: 1) is a major source or is collocated with a major source; or 2) is an area source with a design capacity of 2.5 million megagrams (Mg) and 2.5 million cubic meters (m^3), and emits either equal to or greater than 50 tons per year of non-methane organic compounds (NMOC). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart AAAA.

On August 29, 2016 (81 FR 59332), the EPA finalized a new NSPS subpart (40 CFR part 60, subpart XXX) based on its review of subpart WWW. Concurrently, the EPA finalized revised Emissions Guidelines under a new subpart (40 CFR part 60, subpart Cf). The new Emission Guidelines apply to existing landfills accepting waste after 1987 for which construction was commenced either on or before July 17, 2014. Subpart XXX applies to MSW landfills that are new, reconstructed, or modified after July 17, 2014. The EPA is aware of overlapping requirements between these rules and subpart WWW. 'Burden' associated with overlapping requirements will be accounted for in the ICRs associated with Subpart XXX (ICR number 2498.03, OMB Control number 2060-0697) and Subpart Cf (ICR 2522.02, OMB Control number 2060-0720) once they are approved to avoid duplicating the burden estimates since the requirements in Subpart AAAA mimic most of the requirements in these 2016 rules, except for that the control threshold in new rules require controls at additional landfills beyond what Subpart AAAA requires.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to the NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these

measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

In the United States, there are an average of 1,151 MSW facilities, which are owned and operated by the municipal solid waste industry (aka: the "Affected Public"), that would be subject to this regulation over the next three years. While the majority of these facilities are privately-owned, for-profit businesses, some landfills are owned by either municipal, state, or tribal governments. We assume approximately 36 percent (414 facilities) are publicly owned and 64 percent (737 facilities) are privately owned, based on a landfill ownership analysis from the database used to support the 2016 rulemaking for 40 CFR part 60, subpart XXX and 40 CFR part 60, subpart Cf. The 'burden' to the Affected Public in both the private and public sectors may be found below in both Table 1a: Annual Respondent Burden and Cost – NESHAP Privately-Owned for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NESHAP for Publicly-Owned Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal). The Federal government's burden associated with the review of reports submitted by the 50 states and other respondents may be found below in Table 2: Average Annual EPA Burden – NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

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

Over the next three years, approximately 1,151 respondents per year will be subject to these standards. This includes 27 new or modified respondents per year which will become subject to these same standards. Of these 27 new respondents, 25 are expected to be modified, while two are expected to be new. The estimate is based on the industry growth rate obtained from the database used to support the 2016 rulemakings for 40 CFR part 60, subpart XXX and 40 CFR part 60, subpart Cf.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, hazardous air pollutant (HAP) emissions from MSW landfills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart AAAA.

2(b) Practical Utility/Users of the Data

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

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

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

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

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart AAAA.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to either the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (83 FR 24785) on May 30, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The Agency also analyzed regulatory data in the landfill ownership database used to support the 2016 rulemaking for 40 CFR Part 60, Subpart XXX and 40 CFR Part 60, Subpart Cf. Industry trade associations and other interested parties also provided input on the burden estimated during the 2016 rulemakings for 40 CFR 60 Subpart XXX and 40 CFR 60 Subpart Cf. Approximately 1,151 respondents will be subject to these standards over the three-year period covered by this ICR.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations

promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

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

Standard (40 CFR Part 63, Subpart AAAA)	SIC Codes	NAICS Codes
Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110
Refuse Systems (Solid Waste Landfill)	4953	562212

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA). In addition to the reports and records called out in the regulatory text of Subpart AAAA, the regulatory language requires each source to keep records and reports as specified in 40 CFR part 60, subpart WWW, or in the Federal plan, EPA approved State plan or tribal plan that implements 40 CFR part 60, subpart Cc, whichever applies to your landfill.

A source must make the following reports specific to Subpart AAAA:

Notifications	
Notification of startup, shutdown, and malfunction plan	§63.5(b), §63.1980(b)
Notification of startup, shutdown, and malfunction plan reports	§63.6(e), §63.1980(b)
Notification of deviations to the startup, shutdown, and malfunction plan	§63.1965

Reports	
Semiannual SSM report	§63.10(d)(5), §63.1980(b)
Semiannual compliance report	§§63.1980(a)-(f)

A source must keep the following records unique to subpart AAAA:

Recordkeeping	
Record of startup, shutdown, and malfunction	§63.10(d)(1)
Records of SSM plan and SSM reports	§63.1980(b)
Records of % moisture in waste calculation, where applicable	§63.1980(g)-(h)

Electronic Reporting

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

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.

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

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

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the

emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

The majority of respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. For example, the regulation has a design capacity threshold of 2.5 million megagrams and 2.5 million cubic meters, which limits the effect of this regulation on smaller landfills, which tend to be disproportionately owned by smaller entities. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in both Table 1a: Annual Respondent Burden and Cost – NESHAP Privately-Owned for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NESHAP for Publicly-Owned Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b below document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these record-keeping and reporting requirements is estimated to be 35,200 hours (Total Labor Hours from Tables 1a and 1b below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates for the privately-owned MSW landfills (Table 1a):

Managerial	$147.40 ($70.19+ 110%)
Technical	$117.92 ($56.15 + 110%)
Clerical	$57.02 ($27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

This ICR uses the following labor rates for the publicly-owned MSW landfills (Table 1b):

Managerial	$65.71 (GS-13, Step 5, $41.07 + 60%)
Technical	$48.75 (GS-12, Step 1, $30.47 + 60%)
Clerical	$26.38 (GS-6, Step 3, $16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees.

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

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring for all respondents in both the public and private sectors. The capital/startup costs are one-time costs when any facility becomes subject to these

regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
None	N/A	N/A	N/A	$15	719	$10,800
Total			$0			$10,800

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

There are no total capital/startup costs for this ICR as shown in column D in the above table. The total operation and maintenance (O&M) costs for this ICR are $10,800. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $10,800. These are record-keeping costs.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be $191,000.

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

Managerial $65.71 (GS-13, Step 5, $41.07 + 60%)
Technical $48.75 (GS-12, Step 1, $30.47 + 60%)
Clerical $26.38 (GS-6, Step 3, $16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 1,151 existing respondents will be subject to these standards. It is estimated that an additional 27 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 1,151 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(B) Number of Existing Respondents [2,4]	(C) Number of Existing Respondents that keep records but do not submit reports[2]	(D) Number of Existing Respondents That Are Also New Respondents[3]	(E) Number of Respondents (E=A+B+C-D)
1	27	703	444	25	1,149
2	27	719	430	25	1,151
3	27	735	416	25	1,153
Average	27	719	430	25	1,151

[1] New respondents include sources with constructed, reconstructed and modified affected facilities. On average 2 new greenfields per year and 25 modified landfills per year. Of these 27 sources, 16 are expected to install controls. While sources that commenced construction or modification after July 17, 2014 are subject to 40 Part 60 Subpart XXX instead of Subpart WWW, these new sources are also subject to the NESHAP (40 Part 63 Subpart AAAA).

[2] Sources are subject to the NESHAP because they are a major source, or co-located with a major source, or an area source based on size threshold of 2.5 million Megagrams and 50 Mg/yr NMOC, or meets the definition of a bioreactor. Not all sources subject will be subject to control requirements. All of the major sources overlapped with landfills that had exceeded the 50 Mg/yr NMOC threshold. Since the number of co-located major sources is unknown, the estimated number of sources subject was based on all landfills that met the size threshold, to be conservative and avoid underestimating burden.

[3] Modified landfills are both existing and new sources. These sources have been subtracted to avoid double counting of respondents.

[4] Number of controlling landfills was based on the estimates for landfills controlling under a 50 Mg/yr NMOC emission threshold in 2018, 2019 and 2020. The source of these estimates were the databases used for the 2016 Landfill Rulemakings. See 2016 Municipal Solid Waste New Source Performance Standards (NSPS) and Emission Guidelines (EG) Data Files. Available at: https://www.epa.gov/stationary-sources-air-pollution/2016-municipal-solid-waste-new-source-performance-standards-nsps.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 1,151.

Of this number of total respondents, an average of 719 respondents are required to control LFG emissions and are thus subject to additional reporting requirements. The number of respondents utilizing add-on controls is shown in Column B in the above table as ‘Respondents That Submit Reports’.

Respondents that utilize controls are required to submit additional compliance and SSM reports. The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents [1]	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Prepare and Submit SSM Plan	13	1	0	13
Notification - Deviation of SSM Plan	36	1	0	36
Initial Design Capacity Report	0	1	N/A	0
Amended Design Capacity Report	0	1	N/A	0
Report of NMOC Rate (Tier 1)	0	1	N/A	0
Report of NMOC Rate (Tier 2)	0	1	N/A	0
Landfill Closure Report	0	1	N/A	0
Equipment Removal Report	0	1	N/A	0
Collection and Control System Design Plan	0	1	N/A	0
Initial Performance Test Report	0	1	N/A	0
Revised Design Plan	0	1	N/A	0
Semiannual compliance report[2]	719	1	0	719
Semiannual SSM report	719	2	0	1,438
			Total	2,206

[1]The responses for individual notifications and reports were not quantified here since those items are accounted for in the responses table for 2016 ICRs for 40 CFR Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720). This avoids duplication of burden estimates since the same report prepared under this subpart is completed under subparts XXX or Cf.

[2] Semiannual compliance reports are required under this NESHAP. However, an annual compliance report is already required under 40 CFR Part 60, Subpart Cc or WWW. Therefore, semiannual compliance reporting under this NESHAP will pose a burden for only one additional report.

The number of Total Annual Responses is 2,206.

The total annual labor costs are $3,160,000 (rounded). Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost – NESHAP for Privately-Owned Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NESHAP for Publicly-Owned Municipal

Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 35,200 hours. Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost – NESHAP for Privately-Owned Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal) and Table 1b: Annual Respondent Burden and Cost – NESHAP for Publicly-Owned Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

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

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

The total annual capital/startup and O&M costs to the regulated entity are $10,800. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 4,020 labor hours at a cost of $191,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal).

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

6(f) Reasons for Change in Burden

There is a decrease in the number of responses and Capital/O&M costs in this ICR compared to the previous ICR. The change in burden and cost estimates occurred as a result of the 2016 NSPS (40 CFR part 60, subpart XXX) and Emissions Guidelines (40 CFR part 60, subpart Cf). Most of the ‘Burden’ previously attributed to the ICR for subpart AAAA has been

accounted for in the 2016 ICRs for subparts XXX (ICR 2498.03, OMB 2060-0697) and Cf (ICR 2522.02, OMB 2060-0720) to avoid duplication of 'Burden' for identical requirements. Additionally, the number of responses unique to the subpart AAAA ICR has decreased as a result of improved estimates of the number of landfills subject to control requirements based on data used to support the 2016 ICRs.

There is an increase in the total estimated 'burden' as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. There is an increase in the number of labor hours. This is to be consistent with per line item burden assumptions and number of sources subject to certain requirements related ICRs for subparts XXX (ICR 2498.03, OMB 2060-0697) and Cf (ICR 2522.02, OMB 2060-0720), including an increase in the number of new or modified sources. Additionally, labor hours were added to correct for an error which had previously missed the recordkeeping requirements for liquids addition.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0075. An electronic version of the public docket is available at http://www.regulations.gov/, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone

number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2014-0075 and OMB Control Number 2060-0505 in any correspondence.

Part B of the Supporting Statement

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

Table 1a. Average Annual Respondent Burden and Cost – NESHAP for Privately-Owned Municipal Solid Waste Landfills - (40 CFR Part 63, Subpart AAAA) (Renewal)

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 × C)	(E) Technical Hours per Respondent Per Year (A × C)	(F) Number of Respondents Per Year	(G) Technical Hours per Year @ $117.92 (E × F)	(H) Clerical Hours per Year @ $57.02 (H × 0.1)	(I) Management Hours per Year @ $147.40 (H × .05)	(J) Total Labor Costs Per Year [b]
1. Applications	na										
2. Surveys and Studies	na										
3. Reporting Requirements											
A. Familiarization with Regulatory Requirements [c]	5	$0		1	0	1	737	737	73.70	36.85	$96,541.10
B. Required Activities											
1. Initial performance test report [d,e]	12	$1,983.66	$1,000.00	1	0	12	0	0	0	0	$0
2. Surface methane monitoring quarterly [a,e,f]	44	$703.50		4	176	0	0	0	0	0	$0
3. Wellhead monitoring monthly [a,e,f]	40	$17.00		12	480	0	0	0	0	0	$0
4. SSM Plan[h]	40			1		40	8	320	32	16	$41,917.44
C. Create Information	Included in 3B										
D. Gather Information	Included in 3B										
E. Notifications											
1. Deviation of SSM plan[i]	1			2	0	2	23	46	4.6	2.3	$6,025.63
F. Report Preparation											
1. Initial design capacity report [e]	2	$0		1	0	2	0	0	0	0	$0
2. Amended design capacity report [e]	2	$0		1	0	2	0	0	0	0	$0
3. Report of NMOC rate (Tier 1) [e]	8	$0		1	0	8	0	0	0	0	$0
4. Report of NMOC rate (Tier 2) [e,g]	12	$2,708.28		1	0	12	0	0	0	0	$0
5. Landfill Closure Report [e]	1	$0		1	0	1	0	0	0	0	$0
6. Equipment Removal Report [e]	36	$0		1	0	36	0	0	0	0	$0
7. Collection and Control System Design Plan [e]	80	$0		1	0	80	0	0	0	0	$0
8. Revised design plan [e]	20	$0		1	0	20	0	0	0	0	$0

9. Initial Performance Test	Included in 3B										
10. Compliance Report	Included in 3B										
11. Semi-Annual Report [j]	27	$0		1	0	27	460	12,420	1,242	621	$1,626,920.64
12. Semi-annual SSM reports [k]	6			2	0	12	460	5,520	552	276	$723,075.84
Subtotal for Reporting Requirements									***21,899.45***		***$2,494,480.66***
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) [e]	5	$0		12	0	60	0	0	0	0	$0
2. Recordkeeping and Data Storage (controllers) [e]	11	$0		12	0	132	0	0	0	0	$0
3. Recordkeeping and Data Storage (others) [e]	4	$0		1	0	4	0	0	0	0	$0
4. Records of liquids addition[l]	2			12	0	24	22	528	52.8	26.4	$69,163.78
E. Personnel Training	na										
F. Time for Audits	na										
Subtotal for Recordkeeping Requirements									***607.2***		***$69,163.78***
TOTAL LABOR BURDEN AND COSTS (rounded) [m]									**22,500**		**$2,560,000**
TOTAL CAPITAL AND O&M COST (rounded) [m,n]											**$6,900**
GRAND TOTAL (rounded) [m]									**22,500**		**$2,570,000**

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 the following labor rates: $147.40 per hour for Executive, Administrative, and Managerial labor; $117.92 per hour for Technical labor, and $57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that it will take five hours for each respondent to read instructions as part of their reporting requirements. Based on the regulatory database, 64% of these respondents are private and 36% are public. We have assumed that the average number of existing respondents that will be subject to the rule will be 1,151. An average of 27 additional new or modified sources will become subject to the rule over the three-year period of

this ICR. We assume approximately 36 percent (414 facilities) are publicly owned and 64 percent (737 facilities) are privately owned, based on a landfill ownership analysis from the database used to support the 2016 rulemaking for 40 CFR part 60, subpart XXX and 40 CFR part 60, subpart Cf. An average of 719 of these respondents (or 460 private sector respondents) operate controls.

[d] Based on the annualized capital costs for method 25 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.

[e] No respondents are included here because the burden are accounted for in the estimates for the corresponding burden line items under the ICRs for 40 CFR Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).

[f] For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre). 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. 36% of which are public and 64% of which are private. 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.

[g] Based on the annualized capital costs for conducting a method 25, method 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.

[h] It will take the new respondent 40 hours to prepare the SSM plan. This is a one-time requirement and applies to sources that are newly subject to control requirements. It is estimated than an average of 13 landfills per year are newly subject to control requirements and would incur this burden. Of these 13, 64% or 8 landfills are in the private sector.

[i] We have assumed that 5 percent of respondents will deviate from the SSM plan. This requirement only applies to sources that are subject to controls.

[j] Under the NESHAP rule, semiannual compliance reports are required, however, since one annual compliance report is already required under 40 CFR part 60, subpart Cc, subpart WWW, or subpart XXX. This rule requires that we decrease the annual burden by one report instead of two for this subpart to avoid double counting reports submitted for other subparts.

[k] We have assumed that it will take 6 hours for respondents that operate controls to complete the SSM reports. Sources with controls are required to file semiannual SSM reports for compliance with 40 CFR 63, Subpart AAAA.

[l] Landfills that add liquids other than leachate are required to keep records to demonstrate that their landfill has not met the 40% moisture by weight definition for the bioreactor landfill under the NESHAP. Based on RD&D permit data, we estimate 34 landfills (22 of which are privately owned) add liquids other than leachate and would maintain these records. We have assumed that each of these landfills takes 2 hours per month to maintain these records.

[m] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

[n] O&M costs are for postage and assume $15 per respondent that is required to submit reports.

Table 1b. Average Annual Respondent Burden and Cost – NESHAP for Publicly-Owned Municipal Solid Waste Landfills - (40 CFR Part 63, Subpart AAAA) (Renewal)

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 × C)	(E) Technical Hours per Respondent Per Year (A × C)	(F) Number of Respondents Per Year	(G) Technical Hours per Year @ $117.92 (E × F)	(H) Clerical Hours per Year @ $57.02 (H × 0.1)	(I) Management Hours per Year @ $147.40 (H × .05)	(J) Total Labor Costs Per Year [b]
1. Applications	na										
2. Surveys and Studies	na										
3. Reporting Requirements											
A. Familiarization with Regulatory Requirements [c]	5	$0		1	0	1	414	414	41.4	20.7	$22,634.83
B. Required Activities											
1. Initial performance test report [d,e]	12	$1,983.66	$1,000.00	1	0	12	0	0	0	0	$0
2. Surface methane monitoring quarterly [a,e,f]	44	$703.50		4	176	0	0	0	0	0	$0
3. Wellhead monitoring monthly [a,e,f]	40	$17.00		12	480	0	0	0	0	0	$0
4. SSM Plan[h]	40			1		40	5	200	20	10	$10,934.7
C. Create Information	Included in 3B										
D. Gather Information	Included in 3B										
E. Notifications											
1. Deviation of SSM plan[i]	1			2	0	2	13	26	2.6	1.3	$1,421.51
F. Report Preparation											
1. Initial design capacity report [e]	2	$0		1	0	2	0	0	0	0	$0
2. Amended design capacity report [e]	2	$0		1	0	2	0	0	0	0	$0
3. Report of NMOC rate (Tier 1) [e]	8	$0		1	0	8	0	0	0	0	$0
4. Report of NMOC rate (Tier 2) [e,g]	12	$2,708.28		1	0	12	0	0	0	0	$0
5. Landfill Closure	1	$0		1	0	1	0	0	0	0	$0

Report [e]											
6. Equipment Removal Report [e]	36	$0		1	0	36	0	0	0	0	$0
7. Collection and Control System Design Plan [e]	80	$0		1	0	80	0	0	0	0	$0
8. Revised design plan [e]	20	$0		1	0	20	0	0	0	0	$0
9. Initial Performance Test	Included in 3B										
10. Compliance Report	Included in 3B										
11. Semi-Annual Report [j]	27	$0		1	0	27	259	6,993	699	350	$382,331.79
12. Semi-annual SSM reports [k]	6			2	0	12	259	3,108	310.8	155.4	$169,925.24
Subtotal for Reporting Requirements								***12,352.15***			***$587,248.06***
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) [e]	5	$0		12	0	60	0	0	0	0	$0
2. Recordkeeping and Data Storage (controllers) [e]	11	$0		12	0	132	0	0	0	0	$0
3. Recordkeeping and Data Storage (others) [e]	4	$0		1	0	4	0	0	0	0	$0
4. Records of liquids addition[l]	2			12	0	24	12	288	28.8	14.4	$15,745.97
E. Personnel Training	na										
F. Time for Audits	na										
Subtotal for Recordkeeping Requirements								***331.20***			***$15,745.97***
TOTAL LABOR BURDEN AND COSTS (rounded) [m]								**12,700**			**$603,000**
TOTAL CAPITAL AND O&M COST (rounded) [m,n]											**$3,890**
GRAND TOTAL (rounded) [m]									**12,700**		**$610,000**

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 EPA assumes that MSW landfills owned by municipal, state, or tribal governments will pay their workers at government wage rates. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of $65.71 (GS-13, Step 5, $41.07 + 60%), Technical rate of $48.75 (GS-12, Step 1, $30.47 + 60%), and Clerical rate of $26.38 (GS-6, Step 3, $16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes locality rates of pay.

c We have assumed that it will take five hours for each respondent to read instructions as part of their reporting requirements. Based on the regulatory database, 64% of these respondents are private and 36% are public. We have assumed that the average number of existing respondents that will be subject to the rule will be 1,151. An average of 27 additional new or modified sources will become subject to the rule over the three-year period of this ICR. We assume approximately 36 percent (414 facilities) are publicly owned and 64 percent (737 facilities) are privately owned, based on a landfill ownership analysis from the database used to support the 2016 rulemaking for 40 CFR part 60, subpart XXX and 40 CFR part 60, subpart Cf. An average of 719 of these respondents (or 259 public sector respondents) operate controls.

d Based on the annualized capital costs for method 25 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.

e No respondents are included here because the burden are accounted for in the estimates for the corresponding burden line items under the ICRs for 40 CFR Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).

f For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre). 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. 36% of which are public and 64% of which are private. 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.

g Based on the annualized capital costs for conducting a method 25, method 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.

h It will take the new respondent 40 hours to prepare the SSM plan. This is a one-time requirement and applies to sources that are newly subject to control requirements. It is estimated than an average of 13 landfills per year are newly subject to control requirements and would incur this burden. Of these 13, 36% or 5 landfills are in the public sector.

i We have assumed that 5 percent of respondents will deviate from the SSM plan. This requirement only applies to sources that are subject to controls.

j Under the NESHAP rule, semiannual compliance reports are required, however, since one annual compliance report is already required under 40 CFR part 60, subpart Cc, subpart WWW, or subpart XXX. This rule requires that we decrease the annual burden by one report instead of two for this subpart to avoid double counting reports submitted for other subparts.

k We have assumed that it will take 6 hours for respondents that operate controls to complete the SSM reports. Sources with controls are required to file semiannual SSM reports for compliance with 40 CFR 63, Subpart AAAA.

l Landfills that add liquids other than leachate are required to keep records to demonstrate that their landfill has not met the 40% moisture by weight definition for the bioreactor landfill under the NESHAP. Based on RD&D permit data, we estimate 34 landfills (12 of which are publicly owned) add liquids other than leachate and would maintain these records. We have assumed that each of these landfills takes 2 hours per month to maintain these records.

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

n O&M costs are for postage and assume $15 per respondent that is required to submit reports.

Table 1c: Summary of Annual Respondent Burden and Cost Breakdown by Affected Sector - NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

			Labor Hours	Costs

Affected Sector	Number of Respondents per Year (Average)	Number of Responses Per Year (Average)	Reporting	Record keeping	Total	Labor Cost	Capital and O&M Cost	Total Costs
All Respondents - Total	1,151	2,206	34,252	938	35,200	$3,160,000	$10,800	$3,170,000
All Respondents - Private Sector	737	1,412	21,899	601	22,500	$2,560,000	$6,900	$2,570,000
All Respondents - Public Sector	414	794	12,352	338	12,700	$603,000	$3,890	$607,000

Table 2: Average Annual EPA Burden and Cost – NESHAP for Municipal Solid Waste Landfills (40 CFR Part 63, Subpart AAAA) (Renewal)

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=A×B)	Technical hours per year (D=C)	Management hours per year (E=D×0.05)	Clerical hours per year (F=D×0.1)	(G) Costs, $ [f]
1. Familiarization with Regulatory Requirements [a]	5	10	50	50	3	5	$2,733.80
2. Enter and update information into agency recordkeeping system [b]	2	0	0	0	0	0	$0
3. Required activities							
A. Observe initial performance test [c]	12	0	0	0	0	0	$0
B. Observe surface methane monitoring quarterly [c]	20	0	0	0	0	0	$0
C. Review operating parameters [c]	1	0	0	0	0	0	$0
D. Review continuous parameter monitoring [c]	1	0	0	0	0	0	$0
E. Review notification of performance test [c]	2	0	0	0	0	0	$0
4. Excess Emissions Enforcement Activities [d]	24	72	1,728	1,728	86.4	172.8	$94,475.81
5. Notification requirements							
A. Review amended design capacity report [e]	2	0	0	0	0	0	$0
B. Review of SSM notification of deviation [f]	1	57.5	57.50	58	2.88	5.75	$3,143.73
6. Reporting requirements							
A. Review initial design capacity report [e]	1	0	0	0	0	0	$0
B. Review annual NMOC emission rate report [c]	2	0	0	0	0	0	$0
C. Review landfill closure report [c]	1	0	0	0	0	0	$0
D. Review equipment removal report [c]	1	0	0	0	0	0	$0
E. Review Collection and Control System Design Plan [c]	15	0	0	0	0	0	$0
F. Review Revised Collection and Control System Design Plan [c]	5	0	0	0	0	0	$0
G. Review Initial Performance Test [c]	12	0	0	0	0	0	$0
H. Review Semi-annual Report [c,h]	2	719	1,438	1,438	72	144	$78,620.49
I. Review SSM Plan[i]	8	13	104	104	5.2	10.4	$5,686.04
J. Review Semi-annual SSM Reports [j]	4	29	116	116	5.8	11.6	$6,342.13
7. Travel Expenses for Tests Attended [c,k]	3 days * ($134 hotel + $63 meals/incidentals) + ($600 round trip) = $1191 per trip						$0
TOTAL ANNUAL BURDEN AND COST (rounded)[h]				**4,020**			**$191,000**

Assumptions:

[a] This ICR estimates that staff from each EPA region will familiarize themselves with the requirements of this subpart each year, to account for staff transitions.

[b] Number of occurrences is based on the total number of landfills that are subject to the standard. We have assumed that the average number of existing respondents that will be subject to the rule will be 1,151. An average of 27 additional new or modified sources will become subject to the rule over the three-year period of this ICR. An average of 719 of these respondents operate controls. This line item is accounted for under ICRs for 40 Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).

[c] Number of occurrences is estimated to be zero. This line item is accounted for under ICRs for 40 Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720) and is not duplicated here.

[d] Number of occurrences is based on the assumption that of the landfills that control emissions, 10% of them will have exceedances and need enforcement. There are estimated to be 719 MSW landfills subject to control requirements under the NESHAP. Each investigation into excess emissions will be 24 hours.

[e] No respondents are estimated here because the facilities have already submitted initial design capacity reports under WWW. Amended design capacity reports would be submitted as sources were modified with additional capacity and would become subject to subpart XXX.

[f] We have assumed that the average occurrences per agency or state (1.15) is derived from the number of landfills (1,151) subject to the requirements, divided by the number of states (50) and multiplied by the percentage of sources that are assumed to have excess emissions (0.05). There are no enforcement related activities in ICRs. We have assumed that each of the 50 states will take 1 hour to review the SSM notification.

[g] This cost is based on the following hourly labor rates: $65.71 for Managerial (GS-13, Step 5, $41.07 + 60%), $48.75 for Technical (GS-12, Step 1, $30.47 + 60%) and $26.38 Clerical (GS-6, Step 3, $16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay. These rates have been increased by 60 percent to account for the benefit packages available to government employees.

[h] One of the two semi-annual compliance reports is already accounted for under ICRs for 40 Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720) and is not duplicated here. It is assumed that each report takes 2 hours to review and the number of respondents submitting reports are equal to the number of landfills controlling (719) and therefore subject to this reporting requirements.

i It is estimated than an average of 13 landfills per year are newly subject to control requirements and would incur this burden. We have assumed that the 13 new sources will file SSM plans and it will take agencies 8 hours each to review the SSM plan.

[j] We have assumed that each of the 50 states will take 4 hours twice per year to review the SSM reports. We have assumed that the average occurrences per agency or state (29) is derived from the number of landfills (719) divided by the number of states (50), then multiplied by two (2).

[k] There are no trips estimated since this line item is accounted for under ICRs for 40 Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720) and therefore not duplicated here. The source for hotel and meals/incidental costs is based on FY '18 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

[l] Totals have been rounded to 3 significant figures. Figures may ot add exactly due to rounding.