

**SUPPORTING STATEMENT FOR  
LANDFILL METHANE OUTREACH PROGRAM,  
EPA INFORMATION COLLECTION REQUEST NUMBER 1849.09**

**January 2019**

## **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 1849.09, OMB Control Number 2060-0446.

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

The figures within this supporting statement have been updated for this ICR renewal.

The Landfill Methane Outreach Program (LMOP) is a voluntary program started in 1994 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:

- Memoranda of understanding (MOU) (electronic format);
- Annual information on LFG energy projects and MSW landfills with which the organization is involved (LFG energy project and landfill data) (electronic format); and
- Periodic information updates (electronic format).

As described in the 2016 ICR renewal, LMOP developed electronic data collection to

replace the previous data collection method of emailing Excel spreadsheets to respondents. In 2018, LMOP transitioned to collecting information on LFG energy project and landfill data via electronic collection through the Agency's electronic Greenhouse Gas Reporting Tool (e-GGRT) system. The Program received authorization for this non-substantive change from OMB on August 29, 2018. EPA updated its burden estimates for this ICR renewal to reflect this electronic collection method. Utilizing this electronic collection method is estimated to reduce burden by 0.75 hours per respondent involved in this task. In total, the burden is reduced by approximately 252 hours per year for all respondents. Further, electronic data collection is estimated to reduce the Agency's burden by 199 hours per year.

The LMOP information collection is expected to involve an average of 1,137 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 provided on the LMOP website, making it available to other LMOP Partners as well as the public. These data files were downloaded from the LMOP website over 4,700 times during calendar year 2017. During EPA fiscal year 2017, LMOP processed approximately 35 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. Users of the electronic collection system are asked to review the information presented. The recipients are requested to provide updated or additional information only if the information is incorrect or incomplete.

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(b) 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 September 5, 2018 (83 FR 45124). The Agency did not receive any comments on this ICR renewal.

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

In 2018, LMOP attempted to contact fewer than nine Partners regarding the burden of this information collection, specifically in regards to the electronic collection system (e-GGRT) which is now used for collecting information from Partners on landfill and LFG energy project data. All Partners contacted had experience using the new electronic collection system during 2018. The Partners contacted agreed that the estimated burden for their Partner type was what they would expect for this effort.

One Partner commented that the burden estimate for accessing the e-GGRT system was too low. The burden for this specific task is covered under Cross-Media Electronic Reporting Rule ICR (OMB Control No. 2025-0003) and is outside of the scope of the LMOP ICR to change.

**Table 1: List of Partner Consultations Made in 2018**

<b>Partner Type</b>	<b>Contact Person, Organization</b>	<b>Comments on Burden Estimate</b>
Industry Partner	Ken Robbins, Casella Waste Systems, Inc.	Burden estimate is accurate based on his experience.
Industry Partner	Tim Keesling, Enerdyne Power Systems, Inc.	Burden estimate for LMOP data entry is accurate based on his experience; burden estimate for task of accessing e-GGRT system is too low (this feedback is out of scope of LMOP ICR).
Community Partner	Cliff Shierk, Minnesota Pollution Control Agency	Burden estimate is accurate based on his experience.

### **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 information collection request was prepared in compliance with OMB's and EPA's guidelines for ICR preparation.

**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**

<b>Partner Type</b>	<b>NAICS Code</b>	<b>NAICS Description</b>
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
<b>Industry Partners</b>		
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
	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
<b>Endorsers</b>	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, work 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 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 electronically;
- Sign and submit the form electronically to EPA; and
- File a copy of the MOU.

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

- Obtain access to e-GGRT (this step only for new Partners)
  - Respondent burden for this specific task is covered under Cross-Media Electronic Reporting Rule ICR (OMB Control No. 2025-0003)
- Review instructions;
- Gather information;
- Complete or update information; and
- Submit data updates to EPA via the e-GGRT module.

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:

- Assign LFG energy projects and landfills to new Partners;
- Invite any new Partners to access the e-GGRT module;
- Populate e-GGRT with the current data on LFG energy projects and landfills from the LMOP Database;
- Manage data collection timeline, answer questions, and send reminder emails;
- Review and validate information provided and follow up if necessary; and
- Transfer information received in e-GGRT to the LMOP 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 by email. 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%
<b>Total</b>	<b>12</b>		<b>352</b>	

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 request updates to LFG energy project and landfill data via the electronic collection method. These update requests will be completed in the e-GGRT system 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, 2015, and 2018. For this ICR renewal, labor rates were increased to account for an increase in wages, which impacts cost estimates.

The hourly burden estimates for Industry Developer, Energy, and Community Partners decreased from the 2016 renewal because of the transition to electronic data collection. More specifically, the decrease in hours for this task is accounted for in the reduced time estimated to submit data to LMOP using the e-GGRT system (saving 0.25 hours per respondent) and in removing redundancy among respondent's staff members for data review and submission to EPA (saving 0.5 hours per respondent). The introduction of electronic data collection for this task saves an estimated 0.75 hours per respondent per year as compared to the estimated burden hours from the 2016 ICR 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 \$146.84 for legal staff, \$117.12 for

managerial staff, \$94.34 for technical staff, and \$61.48 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 2017. A June 2018 labor rate for all rates was estimated by applying a 2.5% growth factor from the Employment Cost Index to account for increases in wages from June 2017 to June 2018. 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 \$121.10 for managerial staff, \$102.56 for technical staff, and \$61.36 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 2017. A June 2018 labor rate for all rates was estimated by applying a 2.3% growth factor from the Employment Cost Index to account for increases in wages from June 2017 to June 2018. 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 provide 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	19.75	576.75	1790
	Endorser	1.5	7.5	27
	Industry Non-Developer	42	457.5	1499
	Energy and Industry-Project Developer	33.5	1122	3467
	State	1.5	7.5	27
	<b>Total Hours</b>	<b>98.25</b>	<b>2171.25</b>	<b>6809</b>
	<b>Average Burden per Partner</b>	<b>3.93</b>	<b>1.91</b>	--
Cost	<b>Partner</b>			
	Community	\$1,121	\$33,760	\$104,644
	Endorser	\$143	\$769	\$2,735
	Industry Non-Developer	\$4,302	\$43,162	\$142,392
	Energy and Industry Project Developer	\$3,291	\$107,858	\$333,447
	State	\$79	\$414	\$1,481
	<b>Total Cost</b>	<b>\$8,935</b>	<b>\$185,965</b>	<b>\$584,699</b>
<b>Average Cost per Partner</b>	<b>\$357</b>	<b>\$164</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 \$80.59 for managerial staff, \$55.26 for technical staff, and \$22.19 for clerical staff. To derive these estimates, EPA used the “Salary Table 2018 - GS” from the Department of Personnel Management, available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). 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**

	2019	2020	2021	Average	Total
Hours	913	924	935	924	<b>2,772</b>
Cost	\$50,215	\$50,809	\$51,403	\$50,809	<b>\$152,427</b>

### 6(d) Estimating the Respondent Universe

The growth in new LMOP Partners joining the program has slowed since program inception, but has generally remained consistent 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 number of average annual responses is 647, as detailed in Table 7.

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

Partner	2019		2020		2021		Average	
	Existing	New <sup>1</sup>	Existing	New <sup>1</sup>	Existing	New <sup>1</sup>	Existing	New <sup>1</sup>
Community	147	3	149	3	151	3	149	3
Endorser	39	1	39	1	39	1	39	1
Energy	110	2	111	2	112	2	111	2
Industry								
Non-Developer	722	16	732	16	742	16	732	16
Project Developer	64	2	65	2	66	2	65	2
State	40	1	41	1	42	1	41	1
<b>TOTAL</b>	<b>1,122</b>	<b>25</b>	<b>1,137</b>	<b>25</b>	<b>1,152</b>	<b>25</b>	<b>1,137</b>	<b>25</b>

<sup>1</sup> 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. An average of 43 new Partners joined per year for the period from 2012 to 2014, and an average of 16 new Partners joined per year for the period from 2015 to 2017. The majority of existing and new Partners are Industry-Non Developer.

**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	332	1	N/A	332
			<b>Total</b>	<b>647</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 6,809 hours at a labor cost of \$584,699. EPA estimates the total Agency burden to be 2,772 hours at a labor cost of \$152,427. The annual respondent burden, averaged over the 3-year period, is 2,270 hours at a labor cost of \$194,890, and the annual Agency burden, averaged over the 3-year period, is 924 hours at a labor cost of \$50,809.

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 6,809 hours, or an average of 2,270 hours per year. The 2016 ICR total respondent burden was 7,566 hours, or an average of 2,522 hours per year.

The estimated burden decrease for respondents is based on the transition to electronic collection of updates on LFG energy projects and landfill information. The decrease in hours for this task is accounted for in the reduced time estimated to submit data to LMOP using the e-GGRT system and in removing redundancy among respondent’s staff members for data review and submission to EPA. The burden estimates have not changed for the other collection activities under this ICR.

**6(g) Burden Statement**

The overall annual public reporting and recordkeeping burden for this collection of

information is estimated to average 3.5 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 2019

B-2 Agency Burden 2020

B-3 Agency Burden 2021

**Table A-1**  
**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: Existing State Partners**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 per hour	Tech. \$55.26 per hour	Cler. \$22.19 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Information Update<sup>2</sup></b>									
Gather information	0.00	0.50	0.00	0.50	\$27.63	\$0	10	5.00	\$276.32
Provide information via LMOP website or email	0.00	0.25	0.00	0.25	\$13.82	\$0	5	1.25	\$69.08
Provide information via telephone interview	0.00	0.25	0.00	0.25	\$13.82	\$0	5	1.25	\$69.08
<b>TOTAL</b>								7.50	\$414.48

1 Labor rates for EPA personnel were used for all public-sector personnel, including employees of State agencies. Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 The only burden for existing State Partners is to submit voluntary periodic information updates. It is assumed that one-quarter of all existing State Partners will submit an information update each year. It is assumed that half of those that update their information will provide information through the LMOP website or by email and the other half will provide information through a telephone interview. During the 3-year ICR period the expected average number of existing State Partners is 41. It is assumed 10 existing State Partners will provide an information update each year: 5 through the website or by email, and 5 by telephone.

**Table A-2**

**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: New State Partners**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 per hour	Tech. \$55.26 per hour	Cler. \$22.19 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review MOU	0.25	0.25	0.00	0.50	\$33.96	\$0	1	0.50	\$33.96
Complete MOU	0.25	0.25	0.00	0.50	\$33.96	\$0	1	0.50	\$33.96
Submit MOU to EPA and file copy	0.00	0.00	0.50	0.50	\$11.10	\$0	1	0.50	\$11.10
<b>SUBTOTAL</b>								1.50	\$79.02
<b>Information Update<sup>3</sup></b>									
Gather information	0.00	0.50	0.00	0.50	\$27.63	\$0	0	0.00	\$0.00
Provide information via LMOP website or email	0.00	0.25	0.00	0.25	\$13.82	\$0	0	0.00	\$0.00
Provide information via telephone interview	0.00	0.25	0.00	0.25	\$13.82	\$0	0	0.00	\$0.00
<b>SUBTOTAL</b>								0.00	\$0.00
<b>TOTAL</b>								1.50	\$79.02

1 Labor rates for EPA personnel were used for all public-sector personnel, including employees of State agencies. Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. As of May 2018, 26 out of the 52 states/territories have joined LMOP. For the upcoming 3-year ICR period it is expected that 1 new State Partner will join LMOP per year.

3 New State Partners may also submit voluntary periodic information updates. It is assumed that one-quarter of all new State Partners will submit an information update. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period an average of 1 new State Partner is expected. This rounds down to 0 new State Partners submitting an update.

**Table A-3**

**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: Existing Endorsers**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$121.10 per hour	Tech. \$102.56 per hour	Cler. \$61.36 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Information Update<sup>2</sup></b>									
Gather information	0.00	0.50	0.00	0.50	\$51.28	\$0	10	5.00	\$512.80
Provide information via LMOP website or email	0.00	0.25	0.00	0.25	\$25.64	\$0	5	1.25	\$128.20
Provide information via telephone interview	0.00	0.25	0.00	0.25	\$25.64	\$0	5	1.25	\$128.20
<b>TOTAL</b>								<b>7.50</b>	<b>\$769.20</b>

1 Labor rates for Endorsers were estimated using the average May 2017 labor rates for NAICS industry grouping 813900, Business, Professional, Labor, Political, and Similar Organizations from the Bureau of Labor and Statistics Occupational Employment Statistics at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Engineers, All Other", and for managerial labor was "Managers, All Other". Estimated a June 2018 labor rate using a 2.3% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Management, professional, and related" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 The only burden for existing Endorsers is to submit voluntary periodic information updates. It is assumed that one-quarter of all existing Endorsers will submit an information update each year. It is assumed that half of those that update their information will provide information through the LMOP website or by email and the other half will provide information through a telephone interview. During the 3-year ICR period the expected average number of existing Endorsers is 39. It is assumed 10 existing Endorsers will provide an information update each year: 5 through the website or by email, and 5 by telephone.

Table A-4

## ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: New Endorsers

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$121.10 per hour	Tech. \$102.56 per hour	Cler. \$61.36 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review MOU	0.25	0.25	0.00	0.50	\$55.91	\$0	1	0.50	\$55.91
Complete MOU	0.25	0.25	0.00	0.50	\$55.91	\$0	1	0.50	\$55.91
Submit MOU to EPA and file copy	0.00	0.00	0.50	0.50	\$30.68	\$0	1	0.50	\$30.68
<b>SUBTOTAL</b>								1.50	\$142.51
<b>Information Update<sup>3</sup></b>									
Gather information	0.00	0.50	0.00	0.50	\$51.28	\$0	0	0.00	\$0.00
Provide information via LMOP website or email	0.00	0.25	0.00	0.25	\$25.64	\$0	0	0.00	\$0.00
Provide information via telephone interview	0.00	0.25	0.00	0.25	\$25.64	\$0	0	0.00	\$0.00
<b>SUBTOTAL</b>								0.00	\$0.00
<b>TOTAL</b>								1.50	\$142.51

1 Labor rates for Endorsers were estimated using the average May 2017 labor rates for NAICS industry grouping 813900, Business, Professional, Labor, Political, and Similar Organizations from the Bureau of Labor and Statistics Occupational Employment Statistics at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Engineers, All Other", and for managerial labor was "Managers, All Other". Estimated a June 2018 labor rate using a 2.3% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Management, professional, and related" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 All Endorsers must submit Agreements when they join LMOP. For the upcoming 3-year ICR period it is expected that 1 new Endorser will join LMOP per year.

3 New Endorsers may also submit voluntary periodic information updates. It is assumed that one-quarter of all new Endorsers will submit an information update. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period an average of 1 new Endorser is expected. This rounds down to 0 new Endorsers submitting an update.

**Table A-5**

**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: Existing Industry Non-Developer Partners**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>							Total Hours and Costs		
	Legal \$146.84 per hour	Mgr. \$117.12 per hour	Tech. \$94.34 per hour	Cler. \$61.48 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Information Update<sup>2</sup></b>										
Gather information	0.00	0.00	1.50	0.00	1.50	\$141.52	\$0	183	274.50	\$25,897.45
Provide information via LMOP website or email	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	92	92.00	\$8,679.65
Provide information via telephone interview	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	91	91.00	\$8,585.31
<b>TOTAL</b>									457.50	\$43,162.41

1 Labor rates for Industry Non-Developer Partners were estimated using the average May 2017 labor rates for NAICS industry grouping 541000, Professional, Scientific, and Technical Services at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Environmental Engineers", for managerial labor was "Managers, All Other", and for legal labor was "Lawyers". Estimated a June 2018 labor rate using a 2.5% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Professional, scientific, and technical services" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 The only burden for existing Industry-Non Developer Partners is to submit voluntary periodic information updates. It is assumed that one-quarter of all existing Industry Non-Developer Partners will submit an information update each year. It is assumed that half of those that update their information will provide information through the LMOP website or by email and the other half will provide information through a telephone interview. During the 3-year ICR period the expected average number of existing Industry Non-Developer Partners is 732. It is assumed 183 existing Industry Non-Developer Partners will provide an information update each year: 92 through the website or by email, and 91 by telephone.

**Table A-6**

**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: New Industry Non-Developer Partners**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>							Total Hours and Costs		
	Legal \$146.84 per hour	Mgr. \$117.12 per hour	Tech. \$94.34 per hour	Cler. \$61.48 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>										
Review MOU	0.50	0.25	0.25	0.00	1.00	\$126.29	\$0	16	16.00	\$2,020.59
Complete MOU	0.00	0.25	0.25	0.00	0.50	\$52.87	\$0	16	8.00	\$845.85
Submit MOU to EPA and file copy	0.00	0.00	0.00	0.50	0.50	\$30.74	\$0	16	8.00	\$491.80
SUBTOTAL									32.00	\$3,358.24
<b>Information Update<sup>3</sup></b>										
Gather information	0.00	0.00	1.50	0.00	1.50	\$141.52	\$0	4	6.00	\$566.06
Provide information via LMOP website or email	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	2	2.00	\$188.69
Provide information via telephone interview	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	2	2.00	\$188.69
SUBTOTAL									10.00	\$943.44
TOTAL									42.00	\$4,301.69

1 Labor rates for Industry Non-Developer Partners were estimated using the average May 2017 labor rates for NAICS industry grouping 541000, Professional, Scientific, and Technical Services at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Environmental Engineers", for managerial labor was "Managers, All Other", and for legal labor was "Lawyers". Estimated a June 2018 labor rate using a 2.5% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Professional, scientific, and technical services" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. For the upcoming 3-year ICR period it is expected that 16 new Industry Non-Developer Partners will join LMOP per year.

3 New Industry Non-Developer Partners may also submit voluntary periodic information updates. It is assumed that one-quarter of all new Industry Non-Developer Partners will submit an information update. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period an average of 16 new Industry Non-Developer Partners is expected. It is assumed 4 new Industry Non-Developer Partners will provide an information update each year: 2 through the website or by email, and 2 by telephone.

Table A-7

## ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: Existing Community Partners

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 per hour	Tech. \$55.26 per hour	Cler. \$22.19 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>2</sup></b>									
Review instructions	0.00	0.50	0.00	0.50	\$27.63	\$0	149	74.50	\$4,117.17
Gather information	0.00	1.00	0.00	1.00	\$55.26	\$0	149	149.00	\$8,234.34
Complete or update information	0.50	1.00	0.00	1.50	\$95.56	\$0	149	223.50	\$14,238.44
Submit data updates to EPA via e-GGRT module	0.00	0.25	0.00	0.25	\$13.82	\$0	149	37.25	\$2,058.58
<b>SUBTOTAL</b>								484.25	\$28,648.53
<b>Information Update<sup>3</sup></b>									
Gather information	0.00	1.50	0.00	1.50	\$82.90	\$0	37	55.50	\$3,067.15
Provide information via LMOP website or email	0.00	1.00	0.00	1.00	\$55.26	\$0	19	19.00	\$1,050.02
Provide information via telephone interview	0.00	1.00	0.00	1.00	\$55.26	\$0	18	18.00	\$994.75
<b>SUBTOTAL</b>								92.50	\$5,111.92
<b>TOTAL</b>								576.75	\$33,760.45

1 Labor rates for EPA personnel were used for all public-sector personnel, including employees of State agencies. Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All existing Community Partners agreed to submit information on LFG energy projects and landfill data. During the 3-year ICR period there are an estimated 149 existing Community Partners that will update LFG energy information in e-GGRT each year.

3 Existing Community Partners may submit voluntary periodic information updates. It is assumed that one-quarter of all existing Community Partners will submit an information update each year. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period the expected average number of existing Community Partners is 149. It is assumed 37 will provide an information update each year: 19 through the website or email, and 18 by telephone.

**Table A-8**  
**ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: New Community Partners**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 per hour	Tech. \$55.26 per hour	Cler. \$22.19 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review MOU	0.25	0.25	0.00	0.50	\$33.96	\$0	3	1.50	\$101.89
Complete MOU	0.25	0.25	0.00	0.50	\$33.96	\$0	3	1.50	\$101.89
Submit MOU to EPA and file copy	0.00	0.00	0.50	0.50	\$11.10	\$0	3	1.50	\$33.29
<b>SUBTOTAL</b>								4.50	\$237.07
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>3</sup></b>									
Obtain e-GGRT access <sup>4</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0	3	0.00	\$0.00
Review instructions	0.00	0.50	0.00	0.50	\$27.63	\$1	3	1.50	\$85.90
Gather information	0.00	1.50	0.00	1.50	\$82.90	\$0	3	4.50	\$248.69
Complete or update information	0.50	1.50	0.00	2.00	\$123.19	\$0	3	6.00	\$369.58
Submit data updates to EPA via e-GGRT module	0.00	0.25	0.00	0.25	\$13.82	\$0	3	0.75	\$41.45
<b>SUBTOTAL</b>								12.75	\$745.61
<b>Information Update<sup>5</sup></b>									
Gather information	0.00	1.50	0.00	1.50	\$82.90	\$0	1	1.50	\$82.90
Provide information via LMOP website or email	0.00	1.00	0.00	1.00	\$55.26	\$0	1	1.00	\$55.26
Provide information via telephone interview	0.00	1.00	0.00	1.00	\$55.26	\$0	0	0.00	\$0.00
<b>SUBTOTAL</b>								2.50	\$138.16
<b>TOTAL</b>								19.75	\$1,120.84

1 Labor rates for EPA personnel were used for all public-sector personnel, including employees of State agencies. Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. For the upcoming 3-year ICR period it is expected that 3 new Community Partners will join LMOP per year.

3 All existing Community Partners agreed to submit information on LFG energy projects and landfill data. During the 3-year ICR period there are an estimated 3 new Community Partners that will update LFG energy information in e-GGRT each year.

4 The burden for this task is zero hours because new e-GGRT user registration is accounted for in ICR OMB Number 2025-0003.

5 New Community Partners may also submit voluntary periodic information updates. It is assumed that one-quarter of all new Community Partners will submit an information update. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period an average of 3 new Community Partners is expected. It is assumed 1 new Community Partner will provide an information update each year: 1 through the website or by email, and 0 by telephone.

Table A-9

## ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: Existing Energy and Industry-Project Developer Partners

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>							Total Hours and Costs		
	Legal \$146.84 per hour	Mgr. \$117.12 per hour	Tech. \$94.34 per hour	Cler. \$61.48 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>2</sup></b>										
Review instructions	0.00	0.00	0.50	0.00	0.50	\$47.17	\$0	176	88.00	\$8,302.28
Gather information	0.00	0.00	3.00	0.00	3.00	\$283.03	\$0	176	528.00	\$49,813.67
Complete or update information	0.00	0.50	1.50	0.00	2.00	\$200.07	\$0	176	352.00	\$35,213.18
Submit data updates to EPA via e-GGRT module	0.00	0.00	0.25	0.00	0.25	\$23.59	\$0	176	44.00	\$4,151.14
<b>SUBTOTAL</b>									1,012.00	\$97,480.27
<b>Information Update<sup>3</sup></b>										
Gather information	0.00	0.00	1.50	0.00	1.50	\$141.52	\$0	44	66.00	\$6,226.71
Provide information via LMOP website or email	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	22	22.00	\$2,075.57
Provide information via telephone interview	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	22	22.00	\$2,075.57
<b>SUBTOTAL</b>									110.00	\$10,377.85
<b>TOTAL</b>									1,122.00	\$107,858.12

1 Labor rates for Energy and Industry-Project Developer Partners were estimated using the average May 2017 labor rates for NAICS industry grouping 541000, Professional, Scientific, and Technical Services at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Environmental Engineers", for managerial labor was "Managers, All Other", and for legal labor was "Lawyers". Estimated a June 2018 labor rate using a 2.5% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Professional, scientific, and technical services" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 All existing Energy and Industry-Project Developer Partners agreed to submit information on LFG energy projects and landfill data. During the 3-year ICR period there are an estimated 176 existing Energy and Industry-Project Developer Partners that will update LFG energy information in e-GGRT each year.

3 Existing Energy and Industry-Project Developer Partners may submit voluntary periodic information updates. It is assumed that one-quarter of all existing Energy and Industry-Project Developer Partners will submit an information update each year. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period the expected average number of existing Energy and Industry-Project Developer Partners is 176. It is assumed 44 will provide an information update each year: 22 through the website or email, and 22 by telephone.

Table A-10

## ESTIMATED AVERAGE RESPONDENT BURDEN AND COST: New Energy and Industry-Project Developer Partners

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>							Total Hours and Costs		
	Legal \$146.84 per hour	Mgr. \$117.12 per hour	Tech. \$94.34 per hour	Cler. \$61.48 per hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>										
Review MOU	0.50	0.25	0.25	0.00	1.00	\$126.29	\$0	4	4.00	\$505.15
Complete MOU	0.00	0.25	0.25	0.00	0.50	\$52.87	\$0	4	2.00	\$211.46
Submit MOU to EPA and file copy	0.00	0.00	0.00	0.50	0.50	\$30.74	\$0	4	2.00	\$122.95
SUBTOTAL									8.00	\$839.56
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>3</sup></b>										
Obtain e-GGRT access <sup>4</sup>	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0	4	0.00	\$0.00
Review instructions	0.00	0.00	0.50	0.00	0.50	\$47.17	\$0	4	2.00	\$188.69
Gather information	0.00	0.00	3.00	0.00	3.00	\$283.03	\$0	4	12.00	\$1,132.13
Complete or update information	0.00	0.50	1.50	0.00	2.00	\$200.07	\$0	4	8.00	\$800.30
Submit data updates to EPA via e-GGRT module	0.00	0.00	0.25	0.00	0.25	\$23.59	\$0	4	1.00	\$94.34
SUBTOTAL									23.00	\$2,215.46
<b>Information Update<sup>5</sup></b>										
Gather information	0.00	0.00	1.50	0.00	1.50	\$141.52	\$0	1	1.50	\$141.52
Provide information via LMOP website or email	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	1	1.00	\$94.34
Provide information via telephone interview	0.00	0.00	1.00	0.00	1.00	\$94.34	\$0	0	0.00	\$0.00
SUBTOTAL									2.50	\$235.86
TOTAL									33.50	\$3,290.88

1 Labor rates for Energy and Industry-Project Developer Partners were estimated using the average May 2017 labor rates for NAICS industry grouping 541000, Professional, Scientific, and Technical Services at [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm). Occupational Title used for clerical labor was "Executive Secretaries and Executive Administrative Assistants", for technical labor was "Environmental Engineers", for managerial labor was "Managers, All Other", and for legal labor was "Lawyers". Estimated a June 2018 labor rate using a 2.5% growth factor from the employment cost index to account for increases in wages from June 2017 to June 2018. Obtained growth factor for Occupational Group "Professional, scientific, and technical services" from "Table 2. Seasonally Adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry" at <http://www.bls.gov/news.release/eci.t02.htm>. All labor rates incorporate a factor of 110% to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. For the upcoming 3-year ICR period it is expected that 4 new Energy and Industry-Project Developer Partners will join LMOP per year.

3 All new Energy and Industry-Project Developer Partners agreed to submit information on LFG energy projects and landfill data. During the 3-year ICR period there are an estimated 4 new Energy and Industry-Project Developer Partners that will update LFG energy information in e-GGRT each year.

4 The burden for this task is zero hours because new e-GGRT user registration is accounted for in ICR OMB Number 2025-0003.

5 New Energy and Industry-Project Developer Partners may also submit voluntary periodic information updates. It is assumed that one-quarter of all new Energy and Industry-Project Developer Partners will submit an information update. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. During the 3-year ICR period an average of 4 new Energy and Industry-Project Developer Partners is expected. It is assumed 1 new Energy and Industry-Project Developer Partner will provide an information update each year: 1 through the website or by email, and 0 by telephone.

**Table B-1**  
**ESTIMATED AGENCY BURDEN AND COST FOR 2019**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 Hour	Tech. \$55.26 Hour	Cler. \$22.19 Hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review and sign MOU	0.25	0.50	0.00	0.75	\$47.78	\$0	25	18.75	\$1,194.50
File MOU and return signed copy to the Partner	0.00	0.00	0.50	0.50	\$11.10	\$0	25	12.50	\$277.40
Enter MOU information into a database	0.00	0.50	0.00	0.50	\$27.63	\$0	25	12.50	\$690.80
<b>SUBTOTAL</b>								43.75	\$2,162.70
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>3</sup></b>									
Assign projects and landfills to new Partners	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Invite any new Partners to e-GGRT module	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Load most recent LMOP Database into e-GGRT	0.00	0.25	0.00	0.25	\$13.82	\$0	328	82.00	\$4,531.65
Manage data collection timeline, answer questions, and send reminder emails	0.00	0.50	0.00	0.50	\$27.63	\$0	82	41.00	\$2,265.82
Review and validate information provided and follow up if necessary	0.00	1.00	0.00	1.00	\$55.26	\$0	328	328.00	\$18,126.59
Transfer information received in e-GGRT to the LMOP Database	0.00	0.50	0.00	0.50	\$27.63	\$0	328	164.00	\$9,063.30
<b>SUBTOTAL</b>								618.50	\$34,180.78
<b>Receive Information Update<sup>4</sup></b>									
Review information received via LMOP website, email, or telephone	0.00	0.25	0.00	0.25	\$13.82	\$0	143	35.75	\$1,975.69
Revise data in the database	0.00	0.50	0.00	0.50	\$27.63	\$0	143	71.50	\$3,951.38
<b>SUBTOTAL</b>								107.25	\$5,927.06
<b>Initiate Information Update<sup>4</sup></b>									
Call or email Partner and request updated information	0.00	0.50	0.00	0.50	\$27.63	\$0	144	71.88	\$3,972.10
Revise data in database	0.00	0.50	0.00	0.50	\$27.63	\$0	144	71.88	\$3,972.10
<b>SUBTOTAL</b>								143.75	\$7,944.20
<b>TOTAL</b>								<b>913.25</b>	<b>\$50,214.75</b>

1 Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. In 2019, it is expected that 25 new Partners will join LMOP.

3 In 2019, EPA will open the e-GGRT module for electronic reporting of landfill data for each existing Community, Energy, and Industry-Project Developer Partner to review and revise if necessary, and also provide information on new projects. EPA will assign projects and landfills to applicable new Community, Energy, and Industry-Project Developer Partners when they join the program and invite them to access the e-GGRT module. During electronic reporting, LMOP estimates that one-quarter of respondents will have questions or need reminder emails about accessing the module for data reporting. In 2019, it is estimated that EPA will need to load LMOP project and landfill data into e-GGRT for 7 new and 321 existing Community, Energy, and Industry-Project Developer Partners.

4 In 2019, it is assumed that one-quarter of all existing and new Partners will submit voluntary periodic information updates. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. In 2019, it is anticipated that there will be 1,122 existing and 25 new Partners. It is assumed 287 will provide an information update: 144 through the website or email, and 143 by telephone interview.

**Table B-2**  
**ESTIMATED AGENCY BURDEN AND COST FOR 2020**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 Hour	Tech. \$55.26 Hour	Cler. \$22.19 Hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review and sign MOU	0.25	0.50	0.00	0.75	\$47.78	\$0	25	18.75	\$1,194.50
File MOU and return signed copy to the Partner	0.00	0.00	0.50	0.50	\$11.10	\$0	25	12.50	\$277.40
Enter MOU information into a database	0.00	0.50	0.00	0.50	\$27.63	\$0	25	12.50	\$690.80
<b>SUBTOTAL</b>								43.75	\$2,162.70
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>3</sup></b>									
Assign projects and landfills to new Partners	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Invite any new Partners to e-GGRT module	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Load most recent LMOP Database into e-GGRT	0.00	0.25	0.00	0.25	\$13.82	\$0	332	83.00	\$4,586.91
Manage data collection timeline, answer questions, and send reminder emails	0.00	0.50	0.00	0.50	\$27.63	\$0	83	41.50	\$2,293.46
Review and validate information provided and follow up if necessary	0.00	1.00	0.00	1.00	\$55.26	\$0	332	332.00	\$18,347.65
Transfer information received in e-GGRT to the LMOP Database	0.00	0.50	0.00	0.50	\$27.63	\$0	332	166.00	\$9,173.82
<b>SUBTOTAL</b>								626.00	\$34,595.26
<b>Receive Information Update<sup>4</sup></b>									
Review information received via LMOP website, email, or telephone	0.00	0.25	0.00	0.25	\$13.82	\$0	145	36.25	\$2,003.32
Revise data in the database	0.00	0.50	0.00	0.50	\$27.63	\$0	145	72.50	\$4,006.64
<b>SUBTOTAL</b>								108.75	\$6,009.96
<b>Initiate Information Update<sup>4</sup></b>									
Call or email Partner and request updated information	0.00	0.50	0.00	0.50	\$27.63	\$0	146	72.75	\$4,020.46
Revise data in database	0.00	0.50	0.00	0.50	\$27.63	\$0	146	72.75	\$4,020.46
<b>SUBTOTAL</b>								145.50	\$8,040.91
<b>TOTAL</b>								<b>924.00</b>	<b>\$50,808.84</b>

1 Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. In 2020, it is expected that 25 new Partners will join LMOP.

3 In 2020, EPA will open the e-GGRT module for electronic reporting of landfill data for each existing Community, Energy, and Industry-Project Developer Partner to review and revise if necessary, and also provide information on new projects. EPA will assign projects and landfills to applicable new Community, Energy, and Industry-Project Developer Partners when they join the program and invite them to access the e-GGRT module. During electronic reporting, LMOP estimates that one-quarter of respondents will have questions or need reminder emails about accessing the module for data reporting. In 2020, it is estimated that EPA will need to load LMOP project and landfill data into e-GGRT for 7 new and 325 existing Community, Energy, and Industry-Project Developer Partners.

4 In 2020, it is assumed that one-quarter of all existing and new Partners will submit voluntary periodic information updates. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. In 2020, it is anticipated that there will be 1,137 existing and 25 new Partners. It is assumed 291 will provide an information update: 146 through the website or email, and 145 by telephone interview.

**Table B-3**  
**ESTIMATED AGENCY BURDEN AND COST FOR 2021**

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs		
	Mgr. \$80.59 Hour	Tech. \$55.26 Hour	Cler. \$22.19 Hour	Respon. Hours/ Activity	Labor Cost/ Activity	O & M Cost	Number of Respondents	Total Hours/ Year	Total Cost/ Year
<b>Memoranda of Understanding<sup>2</sup></b>									
Review and sign MOU	0.25	0.50	0.00	0.75	\$47.78	\$0	25	18.75	\$1,194.50
File MOU and return signed copy to the Partner	0.00	0.00	0.50	0.50	\$11.10	\$0	25	12.50	\$277.40
Enter MOU information into a database	0.00	0.50	0.00	0.50	\$27.63	\$0	25	12.50	\$690.80
<b>SUBTOTAL</b>								43.75	\$2,162.70
<b>LFG Energy and Landfill Data update via e-GGRT module<sup>3</sup></b>									
Assign projects and landfills to new Partners	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Invite any new Partners to e-GGRT module	0.00	0.25	0.00	0.25	\$13.82	\$0	7	1.75	\$96.71
Load most recent LMOP Database into e-GGRT	0.00	0.25	0.00	0.25	\$13.82	\$0	336	84.00	\$4,642.18
Manage data collection timeline, answer questions, and send reminder emails	0.00	0.50	0.00	0.50	\$27.63	\$0	84	42.00	\$2,321.09
Review and validate information provided and follow up if necessary	0.00	1.00	0.00	1.00	\$55.26	\$0	336	336.00	\$18,568.70
Transfer information received in e-GGRT to the LMOP Database	0.00	0.50	0.00	0.50	\$27.63	\$0	336	168.00	\$9,284.35
<b>SUBTOTAL</b>								633.50	\$35,009.74
<b>Receive Information Update<sup>4</sup></b>									
Review information received via LMOP website, email, or telephone	0.00	0.25	0.00	0.25	\$13.82	\$0	147	36.75	\$2,030.95
Revise data in the database	0.00	0.50	0.00	0.50	\$27.63	\$0	147	73.50	\$4,061.90
<b>SUBTOTAL</b>								110.25	\$6,092.86
<b>Initiate Information Update<sup>4</sup></b>									
Call or email Partner and request updated information	0.00	0.50	0.00	0.50	\$27.63	\$0	147	73.63	\$4,068.81
Revise data in database	0.00	0.50	0.00	0.50	\$27.63	\$0	147	73.63	\$4,068.81
<b>SUBTOTAL</b>								147.25	\$8,137.62
<b>TOTAL</b>								<b>934.75</b>	<b>\$51,402.92</b>

1 Source for EPA labor rates: Department of Personnel Management, "Salary Table 2018 - GS" at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/GS_h.aspx). For the managerial labor rate, used level GS-15, step 1; for the technical labor rate, used level GS-12, step 5; for the clerical labor rate, used level GS-5, step 1. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2 All Partners must submit MOU when they join LMOP. In 2021, it is expected that 25 new Partners will join LMOP.

3 In 2021, EPA will open the e-GGRT module for electronic reporting of landfill data for each existing Community, Energy, and Industry-Project Developer Partner to review and revise if necessary, and also provide information on new projects. EPA will assign projects and landfills to applicable new Community, Energy, and Industry-Project Developer Partners when they join the program and invite them to access the e-GGRT module. During electronic reporting, LMOP estimates that one-quarter of respondents will have questions or need reminder emails about accessing the module for data reporting. In 2021, it is estimated that EPA will need to load LMOP project and landfill data into e-GGRT for 7 new and 329 existing Community, Energy, and Industry-Project Developer Partners.

4 In 2021, it is assumed that one-quarter of all existing and new Partners will submit voluntary periodic information updates. It is assumed that half of those that update their information will provide information through the LMOP website or email and the other half will provide information through a telephone interview. In 2021, it is anticipated that there will be 1,152 existing and 25 new Partners. It is assumed 294 will provide an information update: 147 through the website or email, and 147 by telephone interview.