

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills
(40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal), EPA ICR Number 1893.08, OMB Control Number 2060-0430.

1(b) Short Characterization/Abstract

The Emission Guidelines (EG) and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60 Subpart Cc) were proposed on May 30, 1991, promulgated on March 12, 1996, and revised on both June 16, 1998, and February 24, 1999. The Federal plan requirements for these regulations (40 CFR Part 62 Subpart GGG) were promulgated on November 8, 1999. Subpart Cc requires either states or tribes develop plans to implement the EG. If approvable state or tribal plans are not developed, EPA is required to develop a Federal Plan (Subpart GGG) to implement the Emission Guidelines for such states and tribes. The Federal Plan is an interim measure to ensure that emissions standards are implemented until states assume their role as the preferred implementers of the EG. States directly implement and enforce their own State plans, whereas EPA both implements and enforces the Federal plan.

A municipal solid waste (MSW) landfill is an entire disposal facility in a contiguous geographical space where household waste is placed either in or on. An MSW landfill may also receive other types of RCRA Subtitle D wastes (§257.2 of this title) such as commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads. An MSW landfill may be either publicly- or privately-owned, and may be a new landfill, an existing landfill, or a lateral expansion. The regulations in 40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG apply to each existing municipal solid waste (MSW) landfills that commenced modification or construction before May 30, 1991, accepted waste at any time since November 8, 1987, or have a capacity available for future waste deposition. This information is being collected to assure compliance with both 40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG.

On August 29, 2016 (81 FR 59332), EPA finalized a new NSPS subpart (40 CFR Part 60, Subpart XXX) based on its review of 40 CFR Part 60 Subpart WWW. The new NSPS is effective as of October 28, 2016. Concurrently, 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. The revised guidelines are implemented under state or federal plans. EPA

is under a court order to finalize a federal plan implementing 40 CFR Part 60, Subpart Cf no later than November 6, 2019 and to approve existing state plans no later than September 6, 2019 for state plans that have been submitted by Delaware; West Virginia; Albuquerque/Bernalillo County, New Mexico; the rest of New Mexico; Maricopa County, Arizona; the rest of Arizona; and California. Subpart XXX applies to MSW landfills that are new, reconstructed, or modified after July 17, 2014. EPA is aware of overlapping requirements between these rules and Subpart Cc, and the state and federal plans implementing Subpart Cc 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 Subparts Cc and WWW mimic most of the requirements in these new rules, except for that the control threshold in new rules require controls at additional landfills beyond what Subparts Cc and WWW require.¹

In general, all Emission Guidelines 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 Emission Guidelines.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such 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.

There are approximately 459 MSW landfills (aka: the “Affected Public”) subject to requirements under Subpart Cc or Subpart GGG. Of these, approximately 174 (38%) facilities are owned and operated by privately-owned, for-profit businesses, while 285 (62%) facilities in the United States are publicly-owned, i.e. owned by either state, local, tribal or the Federal government. We assume that they will all respond to EPA inquiries. The “burden” to the “Affected Public” may be found below in the following tables: 1) Table 1a: Annual Respondent Burden and Cost for Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and

¹ EPA is taking a similar approach in this ICR Renewal for Subpart Cc and Subpart GGG to that done in the ICR Renewal for Subpart WWW (ICR number 1557.10, OMB Control number 2060-0220) in order not to duplicate burden. If a landfill modifies after July 17, 2014, it will be subject to 40 CFR Part 60 Subpart XXX. If a landfill is modified before 2014, but after May 30, 1991, it would have become subject to NSPS WWW. For landfills that modified before May 30, 1991, the landfill was subject to State or Federal plans implementing subpart Cc. Burden that would have previously been attributed to Subpart Cc and Subpart GGG will, in the three-year period of this ICR, be attributed to Subpart Cf because the new state plans and federal plans implementing Subpart Cf will begin to supersede the original state and federal plans implanting Subpart Cc during this 3-year renewal period. However, since state and local agencies directly implement the state plans, the burden estimates on these agencies was retained since such burden is not specifically quantified in the ICR for 40 CFR Part 60 Subpart XXX and 40 CFR Part 60 Subpart Cf.

Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

For landfills covered by a State plan, both State and local agencies are the “implementing agency,” and will incur a burden through the review of reports submitted to them in accordance with the State plan. We assume 67 percent of landfills (308 MSW landfills) are subject to State plans, and that 34 State and local agencies enforce the State plans. The “burden” to State and local agencies is attributed entirely to work performed by either State and/or local employees, and is provided below in Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

For landfills covered by the Federal Plan, EPA is the implementing agency. We assume 33 percent of landfills (151 MSW landfills) are subject to the Federal Plan. The “burden” to the Federal government is attributed entirely to work performed by either Federal employees or government contractors and is provided below in Table 2: Average Annual EPA Burden and Cost - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

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

Over the next three years, approximately 459 MSW landfill owners/operators and 34 State/local agencies, for a total of 493 respondents per year will be subject to these standards. No additional sources will become subject to these same regulations during the next three years. It is not possible for additional facilities to qualify as an existing source, since they would have to be operational already and exceed the design capacity requirements before May 30, 1991.

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 111(d)(1) of the Clean Air Act (CAA), as amended, to:

... prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for

which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates

any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis 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, non-methane organic (NMOC) 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 emission guidelines were promulgated for this source category at 40 CFR Part 60, Subpart Cc, and 40 CFR Part 62, Subpart GGG.

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 these emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times.

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

The required annual 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 60, Subpart Cc and 40 CFR Part 62, Subpart GGG.

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 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.

In addition, the regulatory database used to support the 2016 MSW Landfill rules (Subpart XXX and Subpart Cf) was also queried to identify the number of landfills. There are no new affected facilities since modified sources are not subject to Subpart Cc or Subpart GGG. Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards (Subpart Cc and Subpart GGG) as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In addition, these stakeholders provided input on the burden estimated during the 2016 rulemakings for Subpart XXX and Subpart Cf.

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 the

respondents affected by the standards are provided in the following table:

Standard (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG)	SIC Codes	NAICS Codes
Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110
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 Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG).

A source must make the following reports:

Notifications / Reports	
Initial design capacity report. ¹	§60.33c(d), §60.757(a) §62.14355(a)(1)
Initial and annual NMOC emission rate reports. ¹	§60.33c(e)(1)(i), §60.757(b) §62.14355(a)(2)
Collection and control system design plan. ¹	§60.757(c), §62.14355
Increments of progress report. ¹	§62.14355(b-c)
Annual compliance report	§60.757(f)
Landfill closure report	§60.757(d)
Equipment removal report	§60.757(e)

¹ Because landfills have been subject to the emission guidelines for several years, they have already completed initial notifications and submitted design plans. Since Subpart Cc only applies to existing sources, and no additional sources are expected, only routine reporting, and recordkeeping requirements currently apply.

A source must keep the following records:

Recordkeeping	
Records of control system monitoring (maintain for five years)	§60.758(b)
Records of maximum design capacity, refuse-in-place, year-by-year waste acceptance (maintain for five years)	§60.758(a)
Records of system design and initial performance test/compliance determination (maintain for life of the control equipment)	§60.758(b)

Recordkeeping	
Record of a plot map and well locations for the life of the landfill (maintain for life of collection system)	§60.758(d)
Records of collection & control system exceedances, including surface monitoring exceedances (maintain for five years)	§60.758(c) and (e)

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.
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information
Develop, acquire, install, and utilize technology and systems for 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, excess emissions reports, and surface monitoring methane concentrations 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

Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual 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

A majority of the 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 the regulation. 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 at the end of this document in the following tables: 1) Table 1a: Annual Respondent Burden and Cost for Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); and 3) Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a, 1b, and 1c document the computation of individual ‘burdens’ for the recordkeeping and reporting requirements applicable to the industry for each of the subparts included in this ICR. The individual ‘burdens’ are expressed under standardized headings for landfills, both privately and publicly-owned, that are 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.

Table 1d documents the computation of annual burden for State and local agencies that implement and enforce the State plan. State and local agency ‘burden’ is expressed under standardized headings, which are believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. On average, 34 State/local agencies will be enforcing State plans that cover 308 landfills affected by State plans. State and local agencies conduct the same activities as EPA.

In total, the emission guidelines for MSW landfills are estimated to affect an average of 459 landfills. Of these, 151 are affected by the Federal plan and 308 are affected by State plans.

The 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.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,640 hours (Total Labor Hours from Tables 1a, 1b, and 1c below). The average annual burden to State and local agencies that implement and enforce State plans is 3,880 hours (Total Labor Hours from Table 1d below). These hours are based on Agency studies and background documents from the development of the regulations, Agency knowledge and experience with the emission guideline program, the previously-approved ICR, estimates prepared during the 2016 rulemaking process, and any comments received. These hours are based on Agency studies and background documents from the

development of these regulations, Agency knowledge and experience with the emission guideline 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:

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.

For public-sector respondents (i.e., publicly-owned and/or -operated landfills, and state or local agencies), EPA applied the same Federal government employee labor rates as EPA agency staff, which are presented in Section 6(c).

(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. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. No capital/startup costs are included in this ICR, since these costs would have been incurred in the first year by existing sources, and since no new sources are expected. The annual operation and maintenance costs are the ongoing costs to maintain the monitors 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	(B1) Capital/Startup Cost for One Respondent	(B2) Annualized 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 ¹	(G) Total O&M, (E X F)
Method 25, 25A or 25C testing costs for initial performance	\$10,067	\$1,105	0	\$0	\$0	0	\$0

Capital/Startup vs. Operation and Maintenance (O&M) Costs							
test							
Sampling probe and Method 25, 25A or 25C testing costs for Tier 2 test	\$10,067	\$2,455	0	\$0	\$0	0	\$0
Method 21 Surface Emission Monitor	0	0	0	\$0	\$2,816	0	\$0
Portable Wellhead Monitor	0	0	0	\$0	\$204	0	\$0
Flow Meter	\$3,000	\$330	0	\$0	\$1,000	0	\$0
Thermocouple	\$500	\$55	0	\$0			
Data Recorder	\$4,500	\$494	0	\$0			

¹ The Capital/Startup and O&M costs per line item are shown here as examples, but the number of respondents were not quantified here since the number of respondents incurring these costs are accounted for in the 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).

There are no capital/startup or O&M costs for this ICR, because these costs are accounted for in both the 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).

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 both the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$2,730.

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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 459 landfill owners/operators and 34 State/local agencies, for a combined total of 493 existing respondents, will be subject to these standards. The overall average number of respondents, as shown in the tables below, is 493 per year (459 + 34 = 493).

The number of respondents is calculated using the following two tables that address the three years covered by this ICR:

Number of Respondents – Privately-Owned and Publicly-Owned Landfills					
Year	(A)	(B)	(C)	(D)	(E)
	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports ¹	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
Privately-Owned Landfills					
1	0	0	174	0	174
2	0	0	174	0	174
3	0	0	174	0	174
Average	0	0	174	0	174
Publicly-Owned Landfills					
1	0	0	285	0	285
2	0	0	285	0	285
3	0	0	285	0	285
Average	0	0	285	0	285
Total for Private and Public Landfills					459

¹ There are no new respondents under 40 CFR Part 60 Subpart Cc and 40 CFR Part 62 Subpart GGG. If a landfill subject to Subparts Cc/GGG were to modify, it would become subject to 40 CFR Part 60 Subpart XXX.

Number of Respondents - State and Local Agencies					
Year	(A)	(B)	(C)	(D)	(E)
	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are No Longer Subject ¹	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B-C-D)
1	34	0	0	0	34
2	34	0	0	0	34
3	34	0	0	0	34

Average	34	0	0	0	34
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¹ This ICR assumes that the number of State/local agency respondents will remain constant during the three-year period of this ICR.

Column D is subtracted to avoid double-counting respondents. As shown in the two tables above, the average Number of Respondents over the three-year period of this ICR is 493 per year (459 + 34 = 493).

The total number of annual responses per year is calculated using the following table:

Total Annual Responses ¹				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+(Cx D)
Private Landfills				
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
Annual Report	0	1	174	174
Total Responses for Private Landfills (rounded)				174
Public Landfills				
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

Total Annual Responses ¹				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+(Cx D)
Annual Report	0	1	285	285
Total Responses for Public Landfills (rounded)				285
State/Local Agencies				
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 ²	9	1	N/A	9
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
Annual Report ²	308	1	N/A	308
Total Responses for State/Local Agencies (rounded)				317
Total Responses (rounded)				776

¹ The responses for individual notifications and reports on affected landfills 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). Instead, we captured the number of responses in this ICR as the number of total respondents that keep records but do not submit reports.

² We assume 67 percent of landfills (308 MSW landfills) are subject to State plans and 3 percent of those file closure reports that would be reviewed.

The number of Total Annual Responses is 776, mainly due to respondents (i.e., existing landfills that have not modified) maintaining records, but not reporting under the Emission Guidelines.

The total annual labor costs to landfill owners/operators is \$192,000. Details regarding these estimates may be found below in the following tables: 1) Table 1a: Annual Respondent Burden and Cost for Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); and 3) Table 1c: Annual Respondent Burden and

Cost Breakdown by Affected Sector - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

The total annual labor costs to State and local agencies is \$257,000. Details regarding these estimates may be found below in Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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, 1d, and 2 respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours for landfill owners/operators are 2,640 hours. Details regarding these estimates may be found below in the following tables: 1) Table 1a: Annual Respondent Burden and Cost for Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

The total annual labor hours for State/local agencies is 3,880. Details regarding these estimates may be found below in Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 reporting and recordkeeping burden for this collection of information is estimated to average 8.4 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity under this ICR; such costs incurred are accounted for in the 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).

The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The following table summarizes the respondent tally from Tables 1a, 1b, 1c, and 1d.

Respondent Tally					
Entity	Number of Respondents	Number of Responses per Year	Total Hours per Year	Total Annual Labor Cost	Total Annual O&M Costs
Private landfills	174	174	1,001	\$114,000	\$0
Public landfills	285	285	1,639	\$77,900	\$0
State/local agencies	34	317	3,880	\$257,000	\$0
Total (rounded)	493	776	6,520	\$449,000	\$0

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 58 labor hours at a cost of \$2,730; see below in Table 2: Average Annual EPA Burden and Cost - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

We assume that burdens for managerial tasks take 5 percent 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 percent 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 both the burden hours and the Capital/O&M costs in this ICR as 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 Cc and Subpart WWW has been accounted for in the 2016 ICRs for Subpart XXX (ICR 2498.03, OMB 2060-0697) and Subpart Cf (ICR 2522.02, OMB 2060-0720) to avoid duplication of 'burden' for identical requirements. There is a decrease in number of responses compared to the previous ICR (ICR 1893.07, OMB 2060-0430). While this ICR does not duplicate responses for the 2016 ICRs, each respondent was counted as a respondent that does not report, but maintains records under Subpart Cc.

EPA is taking a similar approach in this ICR Renewal for Subpart Cc and Subpart GGG to that done in the ICR Renewal for Subpart WWW (ICR number 1557.10, OMB Control number 2060-0220) in order not to duplicate burden. 'Burden' that would have previously been

attributed to Subpart Cc and Subpart GGG will, in the three-year period of this ICR, be attributed to 40 CFR Part 60 Subpart Cf (2016 Emission Guidelines) and to either state or federal plans implementing Subpart Cf, once those plans become effective. One comment was submitted on ICR number 1557.10 (Subpart WWW), OMB Control number 2060-0220, that claimed that that EPA had doubled the burden by establishing a new subpart (Subpart XXX). The EPA disagrees that the new Subpart XXX doubles 'burden' and notes that many of the requirements are identical between the two subparts. The comment did not specify any particular burden line items that were significantly different in terms of burden estimates as part of its comments. Additionally, there will be no new sources under Subpart Cc. If a landfill subject to Subpart Cc modifies, it will become subject to Subpart XXX. Further, once either the state or federal plans implementing Subpart Cf become effective, the requirements of 40 CFR Part 60 Subpart Cc and 40 CFR Part 62 Subpart GGG will be superseded.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8.4 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-2012-0680. 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-2012-0680 and OMB Control Number 2060-0430 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: Annual Respondent Burden and Cost for Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (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 Respond- ents Per Year	(G) Technical Hours per Year (E × F)	(H) Clerical Hours per Year (G × 0.1)	(I) Manage- ment Hours per Year (G × .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	5	174	870	87	44	\$113,963.04
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
C. Create Information	Included in 3B										
D. Gather Information	Included in 3B										
E. Report Preparation											
1. Initial design capacity report ^g	2	\$0		1	0	2	0	0	0	0	\$0
2. Amended design capacity report ^g	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,h}	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. Annual Report ^e	27	\$0		1	0	27	0	0	0	0	\$0
Subtotal for Reporting Requirements									1,001		\$113,963
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
E. Personnel Training	NA										
F. Time for Audits	NA										
Subtotal for Recordkeeping Requirements									0		\$0
Total Labor Burden and									1,001		\$114,000

Costs (rounded) ⁱ											
Total Capital and O&M Cost (rounded) ⁱ											\$0
GRAND TOTAL (rounded) ⁱ											\$114,000

Assumptions:

^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. There are a total of 1,147 existing MSW landfills estimated have a design capacity of 2.5 million Mg or more and expected to review the rule requirements. Of these it is estimated that 60 percent (661) of the respondents are subject to Subpart WWW and 40 percent (459) of the respondents are subject to a state or federal plan implementing Subpart Cc. Based on the regulatory database, 38% of the respondents (174) are private and 62% of the respondents (285) are public. There are no new respondents anticipated under this rule.

^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 is 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 \$2,000 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 No respondents are estimated here because the landfills have already submitted initial design capacity reports. Amended design capacity reports would be submitted as landfills were modified with additional capacity and would become subject to Subpart XXX.

^h 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.

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

Table 1b: Annual Respondent Burden and Cost for Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualize d Non- Labor Capital Costs Per Occurrenc e	(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 Responden t Per Year (A × C)	(F) Number of Respond- ents Per Year	(G) Technica l Hours per Year (E × F)	(H) Clerica l Hours per Year (G × 0.1)	(I) Manage- ment Hours per Year (G × .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	5	285	1,425	143	71	\$77,909.7 4
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
C. Create Information	Included in 3B										
D. Gather Information	Included in 3B										
E. Report Preparation											
1. Initial design capacity report ^g	2	\$0		1	0	2	0	0	0	0	\$0
2. Amended design capacity report ^g	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,h}	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

Affected Sector	Number of Respondents per Year (Average)	Number of Responses Per Year (Average)	Reporting	Recordkeeping	Total	Labor Cost	Capital and O&M Cost	Total Costs
Total ^a	459	459	2,640	0	2,640	\$192,000	\$0	\$192,000
Private Sector Only	174	174	1,001	0	1,001	\$114,000	\$0	\$114,000
Public Sector Only	285	285	1,639	0	1,639	\$77,900	\$0	\$77,900

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

Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	State/Local Agency hours per occurrence	Number of occurrences per landfill per year	Landfills per Agency (average # in States enforcing State plans) ^a	Technical person-hours per occurrence per year (D=AxBxC)	Number of agencies enforcing State plans ^b	Technical person-hours per year (F=DxE)	Management person-hours per year (G=Fx0.05)	Clerical person-hours per year (H=Fx0.1)	Costs, \$ ^c
1. Familiarization with Regulatory Requirements ^d	5	NA	NA	5	34	170	8.5	17	\$9,294.50
2. Enter and update information into agency recordkeeping system ^e	2	1	9	18	34	615	31	62	\$33,627.48
3. Required activities					34	0			\$0
A. Observe initial performance test ^h	12	0	9	0	34	0	0	0	\$0
B. Observe surface methane monitoring quarterly ^f	20	1	1.8	36	34	1,230	62	123	\$67,254.97
C. Review operating parameters ^h	1	0	2	0	34	0	0	0	\$0
D. Review continuous parameter monitoring ^h	1	0	9	0	34	0	0	0	\$0
E. Review notification of performance test ^h	2	0	9	0	34	0	0	0	\$0
4. Excess Emissions Enforcement Activities ^f	24	1	0.9	22	34	734	37	73	\$40,152.22
5. Notification requirements									
A. Review amended design capacity report ^g	2	0	9	0	34	0	0	0	\$0
6. Reporting requirements					34	0			\$0
A. Review initial design capacity report ^g	1	0	9	0	34	0	0	0	\$0
B. Review annual NMOC emission rate report ^h	2	0	9	0	34	0	0	0	\$0

C. Review landfill closure report ⁱ	1	0.26	9	0.26	34	9	0.44	0.88	\$483.31
D. Review equipment removal report ^h	1	0	9	0	34	0	0	0	\$0
E. Review Collection and Control System Design Plan ^h	15	0	9	0	34	0	0	0	\$0
F. Review Revised Collection and Control System Design Plan ^h	5	0	9	0	34	0	0	0	\$0
G. Review Initial Performance Test ^h	12	0	9	0	34	0	0	0	\$0
H. Review Annual Report ^j	2	1	9	18	34	615	31	62	\$33,627.48
7. Travel Expenses for Tests Attended ^{f, k} 3 days * (\$134 hotel + \$63 meals/incidentals) + (\$600 round trip) = \$1191 per trip	NA	1	1.8	0	34	NA	NA	NA	\$72,889.20
TOTAL (rounded) ^l							3,880		\$257,000

Assumptions:

^a EPA estimates that 459 MSW landfills are subject to the requirements of Subparts Cc and GGG. EPA assumes that 67 percent of sources (308) are subject to State plans and that 33 percent of sources (151) are covered by the Federal Plan (Subpart GGG), for which EPA is the enforcing agency. EPA data indicates that 34 State and local agencies enforce the State plans.

^b This ICR assumes that 67% of the 459 landfills ($459 \times 0.67 = 307.53$ MSW landfills) are subject to State plans, and that 34 State and local agencies will be enforcing State plans. Thus, each agency is expected to review reports for an average of 9 landfills ($307.53 / 34 = 9.045$, rounded to 9).

^c 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.

^d This ICR estimates that staff from each State or Local Agency will familiarize themselves with the requirements of Subparts Cc and GGG each year, to account for staff transitions.

^e Number of occurrences is based on the total number of landfills that are subject to the standard.

^f Number of occurrences for observing surface emissions and related travel costs is estimated to be 20 percent of the landfills in each state. $9 \text{ landfills} \times 0.2 = 1.8$. Number of occurrences for enforcement is based on the assumption that of the landfills that control emissions, 10% of them will have exceedances and need enforcement, $9 \text{ landfills} \times 0.1 = 0.9$.

^g No respondents are estimated here because the landfills have already submitted initial design capacity reports under Subpart Cc. Amended design capacity reports would be submitted as landfills were modified with additional capacity and would become subject to Subpart XXX.

^h This ICR assumes that all landfills affected by a State plan have already exceeded the 50 Mg/yr NMOC emission threshold and are no longer submitting annual NMOC emission rate reports. It also assumes that all landfills subject to the state plan have already submitted the design plan, and no revisions to design plan occur. Further, all

landfills have conducted their initial performance test and the operating parameters have already been reviewed in prior years. Since no landfills are conducting testing, no excess emissions enforcement activities are estimated to occur. No equipment removal reports were submitted during this period.

ⁱ This ICR assumes 3 percent of landfills will submit a landfill closure report per year.

^j Each state will review the reports of landfills in its state each year.

^k 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 not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost - Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA hours per occurrence	Number of occurrences per year	EPA hours per occurrence per year (C=A×B)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Costs, \$ ^b
1. Familiarization with Regulatory Requirements ^c	5	10	50	NA	50	3	5	\$2,733.68
2. Enter and update information into agency recordkeeping system ^d	2	0	0	0	0	0	0	\$0
3. Required activities				0	0			\$0
A. Observe initial performance test ^e	12	0	0	0	0	0	0	\$0
B. Observe surface methane monitoring quarterly ^e	20	0	0	0	0	0	0	\$0
C. Review operating parameters ^e	1	0	0	0	0	0	0	\$0
D. Review continuous parameter monitoring ^e	1	0	0	0	0	0	0	\$0
E. Review notification of performance test ^e	2	0	0	0	0	0	0	\$0
4. Excess Emissions Enforcement Activities ^e	24	0	0	0	0	0	0	\$0
5. Notification requirements								
A. Review amended design capacity report ^f	2	0	0	0	0	0	0	\$0
6. Reporting requirements				0	0			\$0
A. Review initial design capacity report ^f	1	0	0	0	0	0	0	\$0
B. Review annual NMOC emission rate report ^e	2	0	0	0	0	0	0	\$0
C. Review landfill closure report ^e	1	0	0	0	0	0	0	\$0
D. Review equipment removal report ^e	1	0	0	0	0	0	0	\$0

E. Review Collection and Control System Design Plan ^e	15	0	0	0	0	0	0	\$0
F. Review Revised Collection and Control System Design Plan ^e	5	0	0	0	0	0	0	\$0
G. Review Initial Performance Test ^e	12	0	0	0	0	0	0	\$0
H. Review Annual Report ^e	2	0	0	0	0	0	0	\$0
7. Travel Expenses for Tests Attended ^{e, g}	3 days * (\$134 hotel + \$63 meals/incidentals) + (\$600 round trip) = \$1191 per trip			0	0	0	0	\$0
TOTAL (rounded) ^h						58		\$2,730

Assumptions:

^a EPA estimates that 459 MSW landfills are subject to the requirements of Subparts Cc and GGG. EPA assumes that no sources will close or modify during the three-year period of this ICR. EPA assumes that 67 percent of sources (308) are subject to State plans and that 33 percent of sources (151) are covered by the Federal Plan (Subpart GGG), for which EPA is the enforcing agency. EPA data indicates that 34 State and local agencies enforce the State plans.

^b 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.

^c This ICR estimates that staff from each of EPA's 10 regions will familiarize themselves with the requirements of Subparts Cc and GGG each year, to account for staff transitions.

^d Number of occurrences is based on the total number of landfills that are subject to the standard. 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).

^e 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.

^f No respondents are estimated here because the landfills have already submitted initial design capacity reports under Subpart Cc. Amended design capacity reports would be submitted as landfills were modified with additional capacity and would become subject to Subpart XXX.

^g 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>

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