

**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 <sup>a</sup>	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A × C)	(E) Technical Hours per Respondent Per Year (A × C)	(F) Number of Respondents Per Year	(G) Technical Hours per Year (E × F)	(H) Clerical Hours per Year (G × 0.1)	(I) Management Hours per Year (G × .05)	(J) Total Labor Costs Per Year <sup>b</sup>
1. Applications		NA									
2. Surveys and Studies		NA									
3. Reporting Requirements											
A. Familiarization with Regulatory Requirements <sup>c</sup>	5	\$0		1	0	5	174	870	87	44	\$113,963.04
B. Required Activities											
1. Initial performance test report <sup>d,e</sup>	12	\$1,983.66	\$1,000.00	1	0	12	0	0	0	0	\$0
2. Surface methane monitoring quarterly <sup>d,e,f</sup>	44	\$703.50		4	176	0	0	0	0	0	\$0
3. Wellhead monitoring monthly <sup>d,e,f</sup>	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 <sup>g</sup>	2	\$0		1	0	2	0	0	0	0	\$0
2. Amended design capacity report <sup>g</sup>	2	\$0		1	0	2	0	0	0	0	\$0
3. Report of NMOC rate (Tier 1) <sup>g</sup>	8	\$0		1	0	8	0	0	0	0	\$0
4. Report of NMOC rate (Tier 2) <sup>g,h</sup>	12	\$2,708.28		1	0	12	0	0	0	0	\$0
5. Landfill Closure Report <sup>g</sup>	1	\$0		1	0	1	0	0	0	0	\$0
6. Equipment Removal Report <sup>g</sup>	36	\$0		1	0	36	0	0	0	0	\$0
7. Collection and Control System Design Plan <sup>g</sup>	80	\$0		1	0	80	0	0	0	0	\$0
8. Revised design plan <sup>g</sup>	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 <sup>g</sup>	27	\$0		1	0	27	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>									<b>1,001</b>		<b>\$113,963</b>
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) <sup>i</sup>	5	\$0		12	0	60	0	0	0	0	\$0
2. Recordkeeping and Data Storage (controllers) <sup>i</sup>	11	\$0		12	0	132	0	0	0	0	\$0
3. Recordkeeping and Data Storage (others) <sup>i</sup>	4	\$0		1	0	4	0	0	0	0	\$0
E. Personnel Training		NA									
F. Time for Audits		NA									
<b>Subtotal for Recordkeeping Requirements</b>									<b>0</b>		<b>\$0</b>
<b>Total Labor Burden and Costs (rounded)<sup>1</sup></b>									<b>1,001</b>		<b>\$114,000</b>
<b>Total Capital and O&amp;M Cost (rounded)<sup>1</sup></b>											<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>1</sup></b>											<b>\$114,000</b>

**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 WWV 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 are accounted for in the estimates for the corresponding burden line items under the ICRs for 40 CFR Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).

f For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre). We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$2,000 per month during the most recent ICR renewal for Subpart WWV (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.

**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 <sup>a</sup>	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A × C)	(E) Technical Hours per Respondent Per Year (A × C)	(F) Number of Respondents Per Year	(G) Technical Hours per Year (E × F)	(H) Clerical Hours per Year (G × 0.1)	(I) Management Hours per Year (G × .05)	(J) Total Labor Costs Per Year <sup>b</sup>
1. Applications	NA										
2. Surveys and Studies	NA										
3. Reporting Requirements											
A. Familiarization with Regulatory Requirements <sup>c</sup>	5	\$0		1	0	5	285	1,425	143	71	\$77,909.74
B. Required Activities											
1. Initial performance test report <sup>d,e</sup>	12	\$1,983.66	\$1,000.00	1	0	12	0	0	0	0	\$0
2. Surface methane monitoring quarterly <sup>g,h,i</sup>	44	\$703.50		4	176	0	0	0	0	0	\$0
3. Wellhead monitoring monthly <sup>g,h,i</sup>	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 <sup>g</sup>	2	\$0		1	0	2	0	0	0	0	\$0
2. Amended design capacity report <sup>g</sup>	2	\$0		1	0	2	0	0	0	0	\$0
3. Report of NMOC rate (Tier 1) <sup>g</sup>	8	\$0		1	0	8	0	0	0	0	\$0
4. Report of NMOC rate (Tier 2) <sup>g,h</sup>	12	\$2,708.28		1	0	12	0	0	0	0	\$0
5. Landfill Closure Report <sup>g</sup>	1	\$0		1	0	1	0	0	0	0	\$0
6. Equipment Removal Report <sup>g</sup>	36	\$0		1	0	36	0	0	0	0	\$0
7. Collection and Control System Design Plan <sup>g</sup>	80	\$0		1	0	80	0	0	0	0	\$0
8. Revised design plan <sup>g</sup>	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 <sup>g</sup>	27	\$0		1	0	27	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>									<b>1,639</b>		<b>\$77,910</b>
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) <sup>g</sup>	5	\$0		12	0	60	0	0	0	0	\$0
2. Recordkeeping and Data Storage (controllers) <sup>g</sup>	11	\$0		12	0	132	0	0	0	0	\$0
3. Recordkeeping and Data Storage (others) <sup>g</sup>	4	\$0		1	0	4	0	0	0	0	\$0
E. Personnel Training	NA										
F. Time for Audits	NA										
<b>Subtotal for Recordkeeping Requirements</b>									<b>0</b>		<b>\$0</b>
<b>Total Labor Burden and Costs (rounded)<sup>1</sup></b>									<b>1,639</b>		<b>\$77,900</b>
<b>Total Capital and O&amp;M Cost (rounded)<sup>1</sup></b>											<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>1</sup></b>											<b>\$77,900</b>

**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 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 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 are accounted for in the estimates for the corresponding burden line items under the ICRs for 40 CFR Part 60 Subpart XXX (ICR 2498.03, OMB 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).
- f For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre). We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$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.

**Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - Emission Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc and 40 CFR Part 61)**

Affected Sector	Number of Respondents per Year (Average)	Number of Responses Per Year (Average)	Labor Hours		
			Reporting	Recordkeeping	Total
Total <sup>a</sup>	459	459	2,640	0	2,640
Private Sector Only	174	174	1,001	0	1,001
Public Sector Only	285	285	1,639	0	1,639

<sup>a</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**1 Guidelines and Compliance Times for  
62, Subpart GGG) (Renewal)**

<b>Labor Cost</b>	<b>Capital and O&amp;M Cost</b>	<b>Total Costs</b>
\$192,000	\$0	\$192,000
\$114,000	\$0	\$114,000
\$77,900	\$0	\$77,900

**Table 1d: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Co CFR Part 60, Subpart Cc and 40 CFR Part 62, Subpart GGG) (Renewal)**

Burden Item	(A)	(B)	(C)
	State/Local Agency hours per occurrence	Number of occurrences per landfill per year	Landfills per Agency (average # in States enforcing State plans) <sup>a</sup>
1. Familiarization with Regulatory Requirements <sup>d</sup>	5	NA	NA
2. Enter and update information into agency recordkeeping system <sup>e</sup>	2	1	9
3. Required activities			
A. Observe initial performance test <sup>h</sup>	12	0	9
B. Observe surface methane monitoring quarterly <sup>f</sup>	20	1	1.8
C. Review operating parameters <sup>h</sup>	1	0	2
D. Review continuous parameter monitoring <sup>h</sup>	1	0	9
E. Review notification of performance test <sup>h</sup>	2	0	9
4. Excess Emissions Enforcement Activities <sup>f</sup>	24	1	0.9
5. Notification requirements			
A. Review amended design capacity report <sup>g</sup>	2	0	9
6. Reporting requirements			
A. Review initial design capacity report <sup>g</sup>	1	0	9
B. Review annual NMOC emission rate report <sup>h</sup>	2	0	9
C. Review landfill closure report <sup>i</sup>	1	0.26	9
D. Review equipment removal report <sup>h</sup>	1	0	9
E. Review Collection and Control System Design Plan <sup>h</sup>	15	0	9
F. Review Revised Collection and Control System Design Plan <sup>h</sup>	5	0	9
G. Review Initial Performance Test <sup>h</sup>	12	0	9
H. Review Annual Report <sup>j</sup>	2	1	9
7. Travel Expenses for Tests Attended <sup>f, k</sup> 3 days * (\$134 hotel + \$63 meals/incidentals) + (\$600 round trip) = \$1191 per trip	NA	1	1.8
<b>TOTAL (rounded) <sup>l</sup></b>			

**Assumptions:**

a EPA estimates that 459 MSW landfills are subject to the requirements of Subparts Cc and GGG. EPA assumes that 67 covered by the Federal Plan (Subpart GGG), for which EPA is the enforcing agency. EPA data indicates that 34 State and

b This ICR assumes that 67% of the 459 landfills (459\*0.67 = 307.53 MSW landfills) are subject to State plans, and that 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 (GS-12, Step 5, \$30.47 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes local packages available to government employees.

d This ICR estimates that staff from each State or Local Agency will familiarize themselves with the requirements of Subpart Cc and GGG.

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 based on the assumption that of the landfills that control emissions, 10% of them will have exceedances and need enforce

g No respondents are estimated here because the landfills have already submitted initial design capacity reports under Subpart XXX 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 that all landfills subject to the state plan have already submitted the design plan, and no revisions to design plan occur. Final parameters have already been reviewed in prior years. Since no landfills are conducting testing, no excess emissions enforcement 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. <http://www.gsa.gov/portal/category/100120>

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

**Compliance Times for Existing Municipal Solid Waste Landfills (40**

(D)	(E)	(F)	(G)	(H)	(I)
Technical person-hours per occurrence per year (D=AxBxC)	Number of agencies enforcing State plans <sup>b</sup>	Technical person-hours per year (F=DxE)	Management person-hours per year (G=Fx0.05)	Clerical person-hours per year (H=Fx0.1)	Costs, \$ <sup>c</sup>
5	34	170	8.5	17	\$9,294.50
18	34	615	31	62	\$33,627.48
	34	0			\$0
0	34	0	0	0	\$0
36	34	1,230	62	123	\$67,254.97
0	34	0	0	0	\$0
0	34	0	0	0	\$0
0	34	0	0	0	\$0
22	34	734	37	73	\$40,152.22
0	34	0	0	0	\$0
	34	0			\$0
0	34	0	0	0	\$0
0	34	0	0	0	\$0
0.26	34	9	0.44	0.88	\$483.31
0	34	0	0	0	\$0
0	34	0	0	0	\$0
0	34	0	0	0	\$0
0	34	0	0	0	\$0
18	34	615	31	62	\$33,627.48
0	34	NA	NA	NA	\$72,889.20
			<b>3,880</b>		<b>\$257,000</b>

Labor I
Management
Technical
Clerical

percent of sources (308) are subject to State plans and that 33 percent of sources (151) are local agencies enforce the State plans.

34 State and local agencies will be enforcing State plans. Thus, each agency is expected

or Technical (GS-12, Step 1, \$30.47 + 60%) and \$26.38 Clerical (GS-6, Step 3, \$16.49 + 60%) rates of pay. These rates have been increased by 60 percent to account for the benefit

departments Cc and GGG each year, to account for staff transitions.

landfills in each state. 9 landfills \* 0.2 = 1.8. Number of occurrences for enforcement is 1.8. For clerical, 9 landfills \* 0.1 = 0.9.

part Cc. Amended design capacity reports would be submitted as landfills were

hold and are no longer submitting annual NMOC emission rate reports. It also assumes  
urther, all landfills have conducted their initial performance test and the operating  
rcement activities are estimated to occur. No equipment removal reports were submitted

United States. Airfares are estimated based on experience from other rulemakings. See:

Rates
\$65.71
\$48.75
\$26.38

449,000





**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 <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Costs, \$ <sup>b</sup>
1. Familiarization with Regulatory Requirements <sup>c</sup>	5	10	50	NA	50	3	5	\$2,733.68
2. Enter and update information into agency recordkeeping system <sup>d</sup>	2	0	0	0	0	0	0	\$0
3. Required activities				0	0			\$0
A. Observe initial performance test <sup>e</sup>	12	0	0	0	0	0	0	\$0
B. Observe surface methane monitoring quarterly <sup>e</sup>	20	0	0	0	0	0	0	\$0
C. Review operating parameters <sup>e</sup>	1	0	0	0	0	0	0	\$0
D. Review continuous parameter monitoring <sup>e</sup>	1	0	0	0	0	0	0	\$0
E. Review notification of performance test <sup>e</sup>	2	0	0	0	0	0	0	\$0
4. Excess Emissions Enforcement Activities <sup>e</sup>	24	0	0	0	0	0	0	\$0
5. Notification requirements								
A. Review amended design capacity report <sup>f</sup>	2	0	0	0	0	0	0	\$0
6. Reporting requirements				0	0			\$0
A. Review initial design capacity report <sup>f</sup>	1	0	0	0	0	0	0	\$0
B. Review annual NMOC emission rate report <sup>e</sup>	2	0	0	0	0	0	0	\$0
C. Review landfill closure report <sup>e</sup>	1	0	0	0	0	0	0	\$0
D. Review equipment removal report <sup>e</sup>	1	0	0	0	0	0	0	\$0
E. Review Collection and Control System Design Plan <sup>e</sup>	15	0	0	0	0	0	0	\$0
F. Review Revised Collection and Control System Design Plan <sup>e</sup>	5	0	0	0	0	0	0	\$0
G. Review Initial Performance Test <sup>e</sup>	12	0	0	0	0	0	0	\$0
H. Review Annual Report <sup>e</sup>	2	0	0	0	0	0	0	\$0
7. Travel Expenses for Tests Attended <sup>e,8</sup>	3 days * (\$134 hotel + \$63 meals/incidentals) + (\$600 round trip) = \$1191 per trip			0	0	0	0	\$0
<b>TOTAL (rounded) <sup>h</sup></b>					<b>58</b>			<b>\$2,730</b>

**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 Subpart 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>

## Supporting Statement Tables

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

<sup>1</sup> 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.

<b>Number of Respondents - State and Local Agencies</b>					
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 <sup>1</sup>	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

<sup>1</sup> This ICR assumes that the number of State/local agency respondents will remain constant during the three-year period of this ICR.

<b>Total Annual Responses <sup>1</sup></b>				
(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=(BxC)+(Cx D)
<b>Private Landfills</b>				

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
<b>Total Responses for Private Landfills (rounded)</b>				<b>174</b>
<b>Public Landfills</b>				
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	285	285
<b>Total Responses for Public Landfills (rounded)</b>				<b>285</b>
<b>State/Local Agencies</b>				
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	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	308	1	N/A	308
<b>Total Responses for State/Local Agencies (rounded)</b>				<b>317</b>
<b>Total Responses (rounded)</b>				<b>776</b>

<sup>1</sup> 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.

#### Respondents, Responses, and Hours

Respondent	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
Private	174	174	1,001	0	1,001
Public	285	285	1,639	0	1,639
State & Local Agency	34	317	3,880		3,880
Total	-	776	6,519	0	6,519

QA hr/respo 8.40

Hours per Response	Hours Per Respondent
5.8	6
5.8	6
12	114
8.4	-

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>					
(A)	(B1)	(B2)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/ Startup Cost for One Respondent	Annualized Capital/ Startup Cost for One Respondent	Number of New Respondents	Total Capital/ Startup Cost, (B X C)	Annual O&M Costs for One Respondent
Method 25, 25A or 25C testing costs for initial performance test	\$10,067	\$1,105	0	\$0	\$0
Sampling probe and Method 25, 25A or 25C testing costs for Tier 2 test	\$10,067	\$2,455	0	\$0	\$0
Method 21 Surface Emission Monitor	0	0	0	\$0	\$2,816
Portable Wellhead Monitor	0	0	0	\$0	\$204
Flow Meter	\$3,000	\$330	0	\$0	\$1,000
Thermocouple	\$500	\$55	0	\$0	
Data Recorder	\$4,500	\$494	0	\$0	

<sup>1</sup> The Capital/Startup and O&M costs per line item are shown here as examples but the number of respondents we the number of respondents incurring these costs are accounted for in the 2016 ICRs for 40 CFR Part 60 Subpart X 2060-0697) and 40 CFR Part 60 Subpart Cf (ICR 2522.02, OMB 2060-0720).

(F)	(G)
Number of Respondents with O&M <sup>1</sup>	Total O&M, (E X F)
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0

ere not quantified here since  
 CXX (ICR 2498.03, OMB