

Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart C) (Renewal)

Burden Item	(A) Person Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Technical Person Hours per Respondent Per Year (A x B)	(D) Average Number of Respondents Per Year*	(E) Civil Engineer Hours per Year (C x D)	(F) Civil Engineer Hours per Year (F x .05)	(G) Management Person- Hours per Year (F x 0.1)	(H) Clerical Person- Hours per Year (F x 0.1)	(I) Total Labor Costs Per Year*	Footnote
1. Applications	NA									
2. Surveys and Studies	NA									
3. Reporting Requirements	NA									
A. Familiarize with Rule Requirements	15	1	15	1,185	0	17,380	869	1,738	\$1,823,495	c
B. Required Activities										
1. Initial performance test report	12	1	12	18	0	216	11	22	\$27,662	d
Quarterly	44	4	176	365	64,240	0	0	0	\$1,927,898	e
Wellhead monitoring monthly	40	12	480	365	175,200	0	0	0	\$9,812,426	e
C. Create Information	Included in 3B									
D. Gather Information	Included in 3B									
E. Report Preparation										
1. Initial design capacity report	2	1	2	15	0	30	2	3	\$3,148	f
2. Amended design capacity report	2	1	2	13	0	26	1	3	\$2,728	g
3. Report of NMOC rate (Tier 1)	8	1	8	8	0	64	3	6	\$6,713	h
4. Report of NMOC rate (Tier 2)	12	1	12	8	0	96	5	10	\$10,073	h
5. Landfill Closure Report	1	1	1	10	0	10	1	1	\$1,048	i
6. Equipment Removal Report	36	1	36	0	0	0	0	0	\$0	j
7. Collection and Control System Design Plan	80	1	80	18	0	1,440	72	144	\$151,084	k
8. Revised C&C System design plan	20	1	20	18	0	36	2	4	\$3,760	l
9. Initial Performance Test	Included in 3B									
10. Compliance Report	Included in 3B									
11. Annual Report	27	1	27	365	0	9,855	493	986	\$1,033,978	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2	\$1,574	n
13. Implementation Timeline	15	1	15	1	0	15	1	2	\$1,574	n
14. Non-Cause Analysis	15	1	15	1	0	15	1	2	\$1,574	n
15. Wet Landfill Monitoring Report	15	1	15	175	0	2,625	131	263	\$275,413	o
Subtotal for Reporting Requirements						276,036			\$16,749,141	
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)	5	12	60	365	0	21,900	1,095	2,190	\$2,297,729	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	365	0	48,180	2,409	4,818	\$5,055,005	p
3. Recordkeeping and Data Storage (techs)	4	1	4	92	0	368	18	37	\$38,610	q
E. Personnel Training	NA									
F. Time for Audit	NA									
Subtotal for Recordkeeping Requirements						81,015			\$7,391,344	
Total Labor Burden and Costs (rounded)						357,000			\$24,100,000	r
Total Capital and O&M Cost (rounded)									\$1,520,000	r
Grand Total (rounded)									\$25,600,000	r

Category	Labor Rates	Occupation Code
Management	\$119.85	11-9130
Technical - Civil Engineer	\$95.20	17-2051
Technical - Civil Engineering	\$56.01	17-3022
Clerical	\$38.71	43-9061

https://www.bls.gov/oes/current/oes_nat.html#1-0000

Assumptions:

- We estimate that, during the three-year period of this ICR, there will be an average of 1,912 landfills per year (1,185 privately-owned and 727 publicly-owned) subject to the requirements of Emission Guidelines Subpart Cf. Of these, an average of 652 landfills per year (365 privately-owned and 287 publicly-owned) are controlling emissions.
- This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2019, "National Occupational Employment and Wage Estimates United States" for employees at privately-owned landfills: Managers, All Other for Managerial Labor, Civil Engineers, Civil Engineers Technicians, and Office Clerks, General for Clerical Labor. The rates have been increased by 110 percent to account for the benefits packages available to those employed by private industry.
- We estimate that, over the three-year period of this ICR, all respondents will need to familiarize with the requirements of the rule. We have assumed that each respondent will take 40 hours in the first year to familiarize with the rule as the Federal Plan and State Plans are implemented, and 2 hours per year in the following two years to refamiliarize with the requirements. Therefore we have assumed an average of 15 hrs per occurrence per year over the three year period of this ICR (40 + 2 x 2 yrs = 144 hrs).
- We estimate that, over the three-year period of this ICR, an average of 32 respondents per year (18 privately-owned and 14 publicly-owned) will need to install controls, perform the initial performance test, and submit an initial performance test report. We assume that each respondent will take 12 hours to attend the test, review the report (written by the testing company), and submit the report.
- We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to conduct quarterly surface emissions monitoring and monthly wet emissions monitoring. For surface monitoring, the average acreage of controlled sites is estimated to be 174 acres and we estimate monitoring labor at 0.25 hours per acre for a total of 44 labor hours (174 acres x 0.25 hr/acre = 43.5 hours, rounded to 44) per monitoring event. For wetland monitoring, the estimated burden was based on industry consultation of \$3000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. Cost of re-monitoring for exceedances of surface monitoring or wetland 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.
- Based on the regulatory database, there are 164 landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This averages to 55 landfills annually over the three-year period of this ICR. This is a one-time requirement. Based on the regulatory database, 73% (40) of these respondents are public and 27% (15) are private.
- We assume that 25 landfills per year (13 privately-owned and 12 publicly-owned) will have modifications requiring the submittal of an amended design capacity report during the three-year period of this ICR. Upon modification, these landfills become subject to NSPS Subpart XXX. Burden for the amended design capacity report is calculated under Subpart Cf.
- Landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg mass Tier 1 or Tier 2 reports. We estimate that, over the three-year period of this ICR, an average of 29 respondents per year (8 privately-owned and 21 publicly-owned) will submit Tier 1 reports and another 29 respondents will submit Tier 2 reports. We assume that 50 percent of uncontrolled landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports.
- We assume that 29 controlled landfills (10 privately-owned and 19 publicly-owned) will close during the three-year period of this ICR.
- We assume no landfills will remove control equipment during the three-year period of this ICR. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- Prior to installing a collection and control system, a landfill is required to submit a Collection and Control System Design Plan for approval. We estimate that an average of 32 landfills per year (18 privately-owned and 14 publicly-owned) will submit a Collection and Control System Design Plan for approval during the three-year period of this ICR. This requirement applies only to landfills required to control under the revised 34 Mg/yr requirement.
- We have assumed that 10% of landfills installing a collection and control system will revise their collection and control system design plan. We estimate that, over the three-year period of this ICR, an average of 32 respondents per year (18 privately-owned and 14 publicly-owned) will submit a Collection and Control System Design Plan. This results in submittal of 3.2 C&C System Design Plan revisions per year (18 x 0.1 + 14 x 0.1 = 3.2 revisions/year).
- All controlled landfills are required to submit an annual report. We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to submit this report. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1527.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- We assume that, during the three-year period of this ICR, an average of one privately-owned landfill per year and one publicly-owned landfill per year will be required to conduct a non-cause analysis, corrective action analysis, and implementation timeline. These items are not required by the rule for controlling landfills. A non-cause analysis is only required if the landfill has an exceedance of a wetland parameter that is identified and cannot be corrected within 60 days. If the exceedance cannot be corrected within 60 days the owner or operator must also conduct a corrective action analysis and develop and implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct.
- Landfills with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters that have employed leachate recirculation or added liquids based on a Research, Development, and Demonstration permit must file this report. We assume that, during the three-year period of this ICR, 175 privately-owned landfills and 82 publicly-owned landfills will be required to file this report each year.
- We estimate that, over the three-year period of this ICR, an average of 652 respondents per year operating controlled landfills will need to compile, review and store these data records. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- The average number of respondents per year subject to this recordkeeping requirement is based on the total number of landfills that are subject to the standard but not controlling. These records are simpler for these sources than for landfills controlling emissions.
- Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

Person Hours	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	Total Labor Costs Per Year	Burden
Number of Occurrences Per Respondent Per Year	Technical Per Respondent Per Year (A x B)	Average Number of Responses Per Year *	Civil Engineer Hours per Year (C x D)	Civil Engineer Hours per Year (C x D)	Management Hours per Year (F x .05)	Clerical Hours per Year (F x 0.1)	Total Labor Costs Per Year				
1. Applications	NA										
2. Surveys and Studies	NA										
3. Reporting Requirements											
A. Familiarize with Rule Requirements	15	1	15	727	0	10,663	533	1,066		\$1,118,764	c
B. Required Activities											
1. Initial performance test report	12	1	12	14	0	168	8	17		\$17,627	d
2. Surface methane monitoring quarterly	44	4	176	287	50,512	0	0	0		\$2,829,026	e
3. Wellhead monitoring monthly	40	12	480	287	137,760	0	0	0		\$7,175,528	e
C. Create Information	Included in 3B										
D. Gather Information	Included in 3B										
E. Report Preparation											
1. Initial design capacity report	2	1	2	40	0	80	4	8		\$8,394	f
2. Amended design capacity report	2	1	2	12	0	24	1	2		\$2,518	g
3. Report of NMOC rate (Tier 1)	8	1	8	21	0	168	8	17		\$17,627	h
4. Report of NMOC rate (Tier 2)	12	1	12	21	0	252	13	25		\$26,441	i
5. Landfill Closure Report	1	1	1	15	0	18	1	2		\$1,992	j
6. Equipment Removal Report	36	1	36	0	0	0	0	0		\$0	k
7. Collection and Control System Design Plan	80	1	80	14	0	1,120	56	112		\$117,514	d,k
8. Revised C&C System design plan	20	1	20	1.4	0.0	28	1	3		\$2,955	l
9. Initial Performance Test	Included in 3B										
10. Compliance Report	Included in 3B										
11. Annual Report	27	1	27	287	0	7,749	387	775		\$813,052	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2		\$1,574	n
13. Implementation Timeline	15	1	15	1	0	15	1	2		\$1,574	n
14. Root Cause Analysis	15	1	15	1	0	15	1	2		\$1,574	n
15. Well Landfill Monitoring Brown	15	1	15	82	0	1,230	62	123		\$129,694	o
Subtotal for Reporting Requirements						213,050				\$12,865,213	
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)	5	12	60	287	0	17,220	861	1,722		\$1,806,783	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	287	0	37,884	1,894	3,788		\$3,974,922	p
3. Recordkeeping and Data Storage (others)	4	1	4	72	0	288	14	29		\$30,218	q
F. Personnel Training	NA										
G. Time for Audits	NA										
Subtotal for Recordkeeping Requirements						61,791				\$5,811,923	
Total Labor Burden and Costs (rounded)						276,800				\$18,629,000	
Total Capital and O&M Cost (rounded)										\$3,249,000	
Grand Total (rounded)										\$19,900,000	

Category	Rate	Occupation Code
Management	\$119.85	11-9198
Technical - Civil Engineer	\$95.26	17-2051
Technical - Civil Engineering Technician	\$56.01	17-9022
Clerical	\$36.71	43-9061

https://www.bls.gov/oes/current/oes_nat.htm#1-4000

Totals for 1A + 1B	
	Hours
634,000	
\$42,869,000	\$ Labor
\$3,249,000	\$ Capital/O&M
\$46,600,000	\$ Grand

Assumptions:
 * We estimate that, during the three-year period of this ICR, there will be an average of 1,912 landfills per year (1,185 privately-owned and 727 publicly-owned) subject to the requirements of Emission Guidelines Subpart C. Of these, an average of 652 landfills per year (365 privately-owned and 287 publicly-owned) are controlling emissions.

1. This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2019, "National Occupational Employment and Wage Estimates: United States" for employees at privately-owned landfills: Managers, All Other for Managerial Labor, Civil Engineers, Civil Engineer Technicians, and Office Clerks, General for Clerical Labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

2. We estimate that, over the three-year period of this ICR, all respondents will need to familiarize with the requirements of the rule. We have assumed that each respondent will take 40 hours in the first year to familiarize with the rule as the Federal Plan and State Plans are implemented, and 2 hours per year in the following two years to refamiliarize with the requirements. Therefore we have assumed an average of 15 hrs per occurrence per year over the three-year period of this ICR (40 + 2 + 2 hrs / 3 years = 14.6 hrs).

3. We estimate that, over the three-year period of this ICR, an average of 32 respondents per year (18 privately-owned and 14 publicly-owned) will need to install controls, perform the initial performance test, and submit an initial performance test report. We assume that each respondent will take 12 hours to attend the test, review the report (written by the testing company), and submit the report.

4. We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to conduct quarterly surface emissions monitoring and monthly well emissions monitoring. For surface monitoring, the average average of controlled sites is estimated to be 174 acres and we estimate monitoring labor at 0.25 hours per acre for a total of 44 labor hours (174 acres x 0.25 hr/acre = 43.5 hours, rounded to 44) per monitoring event. For wellhead monitoring, the estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWWW (ICRF 1557.09), or approximately 40 hours of technician labor time. 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.

5. Based on the regulatory database, there are 164 landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This averages to 55 landfills annually over the three-year period of this ICR. This is a one-time requirement. Based on the regulatory database, 73% (60) of these respondents are public and 27% (15) are private.

6. We assume that 25 landfills per year (13 privately-owned and 12 publicly-owned) will have modifications requiring the submission of an amended design capacity report during the three-year period of this ICR. Upon modification, these landfills become subject to NSPS Subpart XXX. Burden for the amended design capacity report is calculated under Subpart C.

7. Landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg must file Tier 1 or Tier 2 reports. We estimate that, over the three-year period of this ICR, an average of 29 respondents per year (9 privately-owned and 21 publicly-owned) will submit Tier 1 reports and another 29 respondents will submit Tier 2 reports. We assume that 50 percent of uncontrolled landfills will use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports.

8. We assume that 29 controlled landfills (10 privately-owned and 19 publicly-owned) will close during the three-year period of this ICR.

9. We assume no landfills will remove control equipment during the three-year period of this ICR. Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
 Prior to installing a collection and control system, a landfill is required to submit a Collection and Control System Design Plan for approval. We estimate that an average of 32 landfills per year (18 privately-owned and 14 publicly-owned) will submit a Collection and Control System Design Plan for approval during the three-year period of this ICR. This requirement applies only to landfills required to control under the revised 34 Mg/yr requirement.

10. We have assumed that 10% of landfills installing a collection and control system will revise their collection and control system design plan. We estimate that, over the three-year period of this ICR, an average of 32 respondents per year (18 privately-owned and 14 publicly-owned) will submit a Collection and Control System Design Plan. This results in submittal of 3.2 C&C System Design Plan revisions per year (18 x 0.1 + 14 x 0.1 = 3.2 revisions/year).

11. All controlled landfills are required to submit an annual report. We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to submit this report. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWWW, ICRF 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.

12. We assume that, during the three-year period of this ICR, an average of one privately-owned landfill per year and one publicly-owned landfill per year will be required to conduct a root cause analysis, corrective action analysis, and implementation timeline. These items are not required by the rule for controlling landfills. A root cause analysis is only required if the landfill has an exceedance of a wellhead parameter that is identified and cannot be corrected within 15 days. If the exceedance cannot be corrected within 60 days the owner or operator must also conduct a corrective action analysis and develop and implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct.

13. Landfills with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters that have employed leachate recirculation or added liquids based on a Research, Development, and Demonstration permit must file this report. We assume that, during the three-year period of this ICR, 175 privately-owned landfills and 82 publicly-owned landfills will be required to file this report each year.

14. We estimate that, over the three-year period of this ICR, an average of 652 respondents per year operating controlled landfills will need to compile, review and store these data records. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWWW, ICRF 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.

15. The average number of respondents per year subject to this recordkeeping requirement is based on the total number of landfills that are subject to the standard but not controlling. These records are simpler for these sources than for landfills controlling emissions.

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

Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Com CFR Part 60, Subpart Cf and Federal Plan) (Renewal)

Burden Item	(A) State/Local Agency hours per occurrence	(B) Number of occurrences per landfill per year	(C) Agency person- hours per occurrence per year (C=AxB)
1. Familiarization with Regulatory Requirements	4	NA	4
2. Enter and update information into agency recordkeeping system	2	1	2
3. Required activities			
A. Observe initial performance test	12	0.2	2
B. Observe surface methane monitoring quarterly	20	0.2	4
C. Review operating parameters	1	1	1
D. Review continuous parameter monitoring	1	1	1
E. Review notification of performance test	2	1	2
4. Excess Emissions Enforcement Activities	24	1	24
5. Reporting requirements			
A. Review initial design capacity report	1	1	1
B. Review amended design capacity report	1	1	1
C. Review annual NMOC emission rate report	2	1	2
D. Review landfill closure report	1	1	1
E. Review equipment removal report	1	1	1
F. Review Collection and Control System Design Plan	15	1	15
G. Review Revised Collection and Control System Design Plan	5	0.1	1
H. Review Initial Performance Test	12	1	12
I. Review Annual Report	2	1	2
J. Review Corrective Action Analysis	1.25	1	1
K. Review Implementation Timeline	1.25	1	1
L. Review Root Cause Analysis	1.25	1	1
M. Review Wet Landfills Monitoring Report	1	1	1
6. Travel Expenses for Tests Attended	3 days * (\$134 hotel + \$63 meals/incidentals) + (\$600 round trip) = \$1191 per trip		
TOTAL (rounded)			

Assumptions:

^a EPA estimates that an average of 1,912 MSW landfills per year are subject to the requirements of Subparts Cf which are in pending but expected to be finalized at part 62 subpart OOO. As of August, 18, 2020 EPA data indicates that 8 State and local agencies will be enforcing State plans effective by 2022. Therefore, 10 State and local agencies will be enforcing State plans. EPA assumes that approximately 37 landfills (370 / 10 = 37). The remainder of these landfills (1,554) are not subject to the requirements of Subpart Cf.

^b This cost is based on the following hourly labor rates: \$68.37 for Managerial (GS-13, Step 5, \$42.73 + 60%), \$50.72 for Technical (GS-11, Step 5, \$31.07 + 60%). These rates are from the Office of Personnel Management (OPM) “2020 General Schedule” which excludes locality packages available to government employees.

^c This ICR estimates that staff from each State or Local Agency will familiarize themselves with the requirements of Subpart Cf.

^d Every year, Agencies enter and update information for each of the 360 landfills that are subject to the standard and under

^e Initial performance tests under Subpart Cf/Subpart OOO are only needed if the landfill is not a legacy controller that had equipment that has not been tested. We assume 96 landfills will perform an initial performance test during the three-year period in states that enforce state plans ($32 * 0.19 = 6$ landfills per year). The remaining 81% are in states subject to a federal plan performance tests and 20% of the surface methane monitoring tests.

^f The number of landfills is based on the average number of landfills per year expected to install controls, perform the initial performance test report during the three-year period of this ICR.

^g The number of occurrences for enforcement is based on the assumption that of the landfills that test (6), 10% of them will

^h The initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previous average of 55 landfills per year to file this report. Of this 55, approximately 19% or 10 landfills are in states that enforce state

ⁱ Amended design capacity reports are submitted as landfills are modified to add additional capacity. At this point, the landfills modifications per year during the three-year period of this ICR. Of these 25 landfills approximately 19% or 5 landfills are in calculated under Subpart Cf.

^j Annual NMOC emission rate reports are filed by uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC. 58 respondents per year will submit Tier 1 or Tier 2 reports. Of these, 11 are in states that enforce state plans. ($58 * 0.19 = 11$)

^k The EPA estimates that an average 29 landfills will submit a landfill closure report per year over the three-year period of this ICR. ($0.19 = 5.51$, rounded to 6)

^l The EPA estimates that no equipment removal reports were submitted during the three-year period of this ICR.

^m Landfills required to control emissions must submit a landfill gas Collection and Control System Design Plan. EPA assumes this ICR for an average of 32 landfills per year. 19% of these landfills are in states that enforce state plans ($32 * 0.19 = 6$ landfills = 26).

ⁿ EPA assumes that 10% of respondents submitting a collection and control system design plan will submit a revised design plan.

^o EPA reviews all initial performance test reports. EPA assumes 96 landfills will perform an initial performance test during the three-year period these landfills are in states that enforce state plans ($32 * 0.19 = 6$ landfills per year).

^p All controlled landfills are required to submit an annual report. EPA estimates that, over the three-year period of this ICR, 32 landfills are in states that enforce state plans and will need to submit this report.

^q EPA assumes that an average of one landfill per year subject to controls will have at least one wellhead exceedance that requires

^r EPA assumes that, during the three-year period of this ICR, an average of 266 landfills will be required to file this report and the remaining 215 are in states subject to a federal plan (an average of 26 landfills per year).

^s We assume State/Local agencies will attend 20% of performance tests (6 per year) and surface monitoring (124 per year). We assume 20% of performance tests and surface monitoring, multiplied by \$1,128 per trip. The source for hotel and meals/incidental expenses. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100121>

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

pliance Times for Existing Municipal Solid Waste Landfills (40

(D) Landfills per Year Administered By State/Local Agencies ^a	(E) Technical hours per year (CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Costs, \$ ^b	Footnotes
10	40	2	4	\$2,275	c
360	720	36	72	\$40,957	d
6	14	1	1	\$819	e
124	496	25	50	\$28,215	e
6	6	0.3	1	\$341	f
6	6	0.3	1	\$341	f
6	12	1	1	\$683	f
1	24	1	2	\$1,365	g
10	10	1	1	\$569	h
5	5	0.3	1	\$284	i
11	22	1	2	\$1,251	j
6	6	0.3	1	\$341	k
0	0	0	0	\$0	l
6	90	5	9	\$5,120	m
0.6	0.3	0.02	0.03	\$17	n
6	72	4	7	\$4,096	o
124	248	12	25	\$14,107	p
1	1	0.1	0.1	\$71	q
1	1	0.1	0.1	\$71	q
1	1	0.1	0.1	\$71	q
51	51	3	5	\$2,901	r
26	NA	NA	NA	\$30,966	s
		2,100		\$135,000	t

Labo
Management
Technical
Clerical

plemented under state plans and a federal plan. The federal plan is currently
 al agencies enforce the State plans and two other state agencies are expected to have
 imately 19 percent of sources (370) are covered by the State Plans. Thus, each
 will be covered by a federal plan once it becomes effective.

Technical (GS-12, Step 1, \$31.70 + 60%) and \$27.46 Clerical (GS-6, Step 3, \$17.16 +
 rates of pay. These rates have been increased by 60 percent to account for the benefit

rts Cf and OOO each year, to account for staff transitions.

State/Local agency jurisdiction.

previously submitted a performance test unless the landfill installs new destruction period of this ICR for an average of 32 landfills per year. 19 percent of these landfills are in states that enforce state plans ($32 * 0.81 = 26$). We expect each Agency to observe/review 20% of the initial

performance test, begin monitoring operating parameters, and submit an initial

report. EPA estimates that, over the three-year period of this ICR, an average of 6

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($6 * 0.1 = 0.6$, rounded to 1).

previously submitted a report. Over the three-year period of this ICR, we expect an average of 25

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($25 * 0.19 = 4.75$, rounded to 5)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($29 * 0.19 = 5.51$, rounded to 6)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($32 * 0.81 = 26$)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($32 * 0.81 = 26$)

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landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($653 * 0.19 = 124$)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($653 * 0.19 = 124$)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($266 * 0.19 = 51$)

landfills will be required to install controls during the three-year period of this ICR. Of these, approximately 19% are in states that enforce state plans. ($266 * 0.19 = 51$)

0

ir Rates
\$68.37
\$50.72
\$27.46

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

Burden Item	(A) EPA hours per occurrence	(B) Number of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Landfills per year ^a	(E) Technical hours per year (CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Costs, \$ ^b	Footnotes
1. Familiarization with regulatory requirements (10 EPA Regions)	4	1	4	10	40	2	4	\$2,275	c
2. Enter and update information into agency recordkeeping system	2	1	2	1,552	3,104	155	310	\$176,569	d
3. Required activities									
A. Observe initial performance test	12	0.2	2	26	62	3	6	\$3,550	e
B. Observe surface methane monitoring quarterly	20	0.2	4	528	2,112	106	211	\$120,140	e
C. Review operating parameters	1	1	1	26	26	1	3	\$1,479	f
D. Review continuous parameter monitoring	1	1	1	26	26	1	3	\$1,479	f
E. Review notification of performance test	2	1	2	26	52	3	5	\$2,958	f
4 Excess Emissions Enforcement Activities	24	1	24	3	72	4	7	\$4,096	g
5. Reporting requirements									
A. Review initial design capacity report	1	1	1	45	45	2	5	\$2,560	h
B. Review amended design capacity report	1	1	1	20	20	1	2	\$1,138	i
C. Review annual NMOC emission rate report	2	1	2	47	94	5	9	\$5,347	j
D. Review landfill closure report	1	1	1	23	23	1	2	\$1,308	k
E. Review equipment removal report	1	1	1	0	0	0	0	\$0	k
F. Review Collection and Control System Design Plan	15	1	15	26	390	20	39	\$22,185	e, l
G. Review Revised Collection and Control System Design Plan	5	0.1	1	2.6	1	0	0	\$74	m
H. Review Initial Performance Test Report	12	1	12	26	312	16	31	\$17,748	e
I. Review Annual Report	2	1	2	528	1,056	53	106	\$60,070	n
J. Review Corrective Action Analysis	1.25	1	1.25	1	1	0	0	\$71	o
K. Review Implementation Timeline	1.25	1	1.25	1	1	0	0	\$71	o
L. Review Root Cause Analysis	1.25	1	1.25	1	1	0	0	\$71	o
M. Wet Landfills Monitoring Report	1	1	1	215	215	11	22	\$12,230	p
6. Travel Expenses for Tests Attended (EPA attends 20% of tests and surface monitoring)	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1,128 per trip			111				\$122,877	q
TOTAL (Rounded)						8,800		\$558,000	r

Assumptions:

- ^a EPA estimates that 1,912 MSW landfills are subject to the requirements of Subparts Cf which are implemented under state plans and a federal plan. The federal plan is currently pending but expected to be finalized at part 62 subpart OOO. EPA assumes that 81 percent of sources (1,552) will be subject to the federal plan by 2022 for which EPA is the enforcing agency and that 19 percent of sources (360) are covered by the State Plans. As of August, 18, 2020 EPA data indicates that 8 State and local agencies enforce the State plans and two other state agencies are expected to have their plans effective by 2022.
- ^b This ICR uses the following labor rates: \$68.37 for managerial, \$50.72 for technical, and \$27.46 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- ^c The number of plants per year is the number of EPA Regions (10 regions). We assume one EPA employee at each Region offices will familiarize themselves with the requirements of Subparts Cf and OOO each year, to account for staff transitions.
- ^d The number of plants per year is based on the total number of landfills that are subject to the Federal Plan.
- ^e Initial performance tests under Subpart Cf/Subpart OOO are only needed if the landfill is not a legacy controller that had previously submitted a performance test unless the landfill installs new destruction equipment that has not been tested. Over the three-year period of this ICR, a total of 96 landfills, or 32 landfills per year, are expected to perform initial testing. Approximately 81% of these landfills (32 * 0.81 = 26) are in states subject to a federal plan. Surface methane monitoring is performed at landfills that control emissions. Of the 653 landfills that control emissions, approximately 81% of these (653 * 0.81 = 528) are in states subject to a federal plan. The number of observations of initial performance tests and surface methane monitoring per year is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring occurs. ((26 + 528) * 0.2 = 111)
- ^f The number of landfills is based on the average number of landfills per year expected to install controls, perform the initial performance test, begin monitoring operating parameters, and submit an initial performance test report during the three-year period of this ICR.
- ^g The number of landfills per year is based on the assumption that of the landfills that test and are located in states subject to a federal plan (26), 10% of them will have exceedances and need enforcement once per year. (26 * 0.1 = 2.6, rounded to 3).
- ^h Initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously submitted a report. EPA estimates that, during the three-year period of this ICR, a total of 164 landfills, or an average of 55 landfills per year, meet this category. Of these 55 landfills, approximately 81% (55 * 0.81 = 45 landfills per year) are in states subject to the federal plan.
- ⁱ EPA assumes that 25 landfills per year currently subject to Subpart Cf will have modifications requiring the submittal of an amended design capacity report during the three-year period of this ICR. Of these 25 landfills, approximately 81% (25 * 0.81 = 20 landfills per year) are in states subject to the federal plan. Upon modification, these landfills become subject to NSPS Subpart XXX. The burden to EPA for the amended design capacity report is calculated under Subpart Cf.
- ^j The number of plants is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports. We estimate that, over the three-year period of this ICR, an average of 58 respondents per year will submit Tier 1 or Tier 2 reports. Of these 58 landfills, 47 are located in states that subject to a federal plan. (58 * 0.81 = 47)
- ^k This ICR assumes that on average 29 landfills will submit a landfill closure report per year. Of these 29 landfills, 81% are in states that are subject to a federal plan (29 * 0.81 = 23.49, rounded to 23). EPA estimates that no equipment removal reports will be submitted during the three-year period of this ICR.
- ^l Initial performance tests under Subpart Cf/Subpart OOO are only needed if the landfill is not a legacy controller that had previously submitted a performance test unless the landfill installs new destruction equipment that has not been tested. Over the three-year period of this ICR, a total of 96 landfills, or 32 landfills per year, are expected to submit a collection and control system design plan. Approximately 81% of these landfills (32 * 0.81 = 26) are in states subject to a federal plan.
- ^m We assume that 10 percent of respondents submitting a collection and control system design plan will submit a revised design plan to account for changes to the landfill or the GCCS as allowed for in 60.767(h).
- ⁿ All controlled landfills are required to submit an annual report. We estimate that, over the three-year period of this ICR, an average of 528 respondents per year (653 * 0.81 = 528) operating controlled landfills will need to submit this report under the Federal Plan.
- ^o Number of plants is based on the assumption that one landfill subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- ^p We assume that, during the three-year period of this ICR, an average of 266 landfills per year will be required to file this report each year. Of these 266 landfills, 81 percent are in states subject to a federal plan. (266 * 0.81 = 215)

Table 3: Universe of Existing Landfills Subject to Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

Burden Item	Emission Guidelines Only (Sources constructed or modified prior to July 2014)							Footnotes
	Number of Respondents			Sector				
	Year 2022	Year 2023	Year 2024	Private		Public		
				% Respondents	3-Year Average Number Respondents	% Respondents	3-Year Average Number Respondents	
1. Applications								
2. Surveys and Studies								
3. Reporting Requirements								
A. Read and Understand Rule Requirements	1937	1912	1887	62%	1185	38%	727	a
B. Required Activities								
1. Initial performance test report	92	0	4	56%	18	44%	14	b
2. Surface methane monitoring quarterly	656	648	654	56%	365	44%	287	c
3. Wellhead monitoring monthly	656	648	654	56%	365	44%	287	d
C. Create Information								
D. Gather Information								
E. Report Preparation								
1. Initial design capacity report	164	0	0	27%	15	73%	40	e
2. Amended design capacity report	25	25	25	53%	13	47%	12	f
3. Report of NMOC rate (Tier 1)	29	30	28	27%	8	73%	21	g
4. Report of NMOC rate (Tier 2)	29	30	28	27%	8	73%	21	
5. Landfill Closure Report	33	22	33	35%	10	65%	19	h
6. Equipment Removal Report	0	0	0	35%	0	65%	0	i
Plan	92	0	4	56%	18	44%	14	j
8. Revised C&C System design plan	9	0.0	0.4	56%	1.8	44%	1.4	k
9. Initial Performance Test	Included in 3B							
10. Compliance Report	Included in 3B							
11. Annual Report	656	648	654	56%	365	44%	287	l
12. Corrective Action Analysis	2	2	2	50%	1	50%	1	m
13. Implementation Timeline	2	2	2	50%	1	50%	1	m
14. Root Cause Analysis	2	2	2	50%	1	50%	1	m
15. Wet Landfill Monitoring Report	266	266	266		175		82	n
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)	656	648	654	56%	365	44%	287	o
2. Recordkeeping and Data Storage (controllers)	656	648	654	56%	365	44%	287	o
3. Recordkeeping and Data Storage (others)	164	164	164	56%	92	44%	72	p
E. Personnel Training	NA							
F. Time for Audits	NA							

Assumptions:

- ^a EPA estimates that an average of 1,924 respondents per year are subject based on waste acceptance data found in the regulatory database developed for the 2016 rule.
- ^b This is a one time requirement. Only additional controllers from previous years are subject. Initial year burden is high since most state plans or federal plans have not yet taken effect.
- ^c Total number of controllers each year must conduct SEM. This is a recurring requirement. New greenfield sources coming online are not expected to trigger requirements.
- ^d Total number of controllers each year must conduct wellhead monitoring. This is a recurring requirement.
- ^e These are landfills that are smaller than 2.5 million Mg. This is a one-time requirement so 0 in later years. Legacy controllers are exempt from this requirement.
- ^f Landfills filing an amended design capacity report (modified landfill) under the EG will become subject to subpart XXX.
- ^g This is the sum of reporters at open landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg. Of these, 50% are assumed to do Tier 1 and 50% assumed to do Tier 2. Closed landfills do not have to keep doing the annual NMOC report.
- ^h We assume that only landfills subject to the EG would close during the three-year period of this ICR.
- ⁱ EPA assumes that no sources remove equipment during the three-year period of this ICR.
- ^j The initial year burden is higher since most state plans or federal plans have not yet taken effect.
- ^k EPA assumes that 10% of controllers will prepare revised GCCS
- ^l All landfills that control emissions must file an annual report.
- ^m It is unknown how many landfills will be required to conduct a root cause analysis, corrective action analysis, or implementation timeline. These items are not required by the rule for controlling landfills. A root cause analysis is only required if the landfill has an exceedance of the wellhead parameter is identified and cannot be corrected within 15 days. If the exceedance cannot be corrected within 60 days the owner or operator must also conduct a corrective action analysis and develop and implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated. For the purposes of estimating ICR burden, EPA estimates that one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- ⁿ Only landfills with leachate recirculation or RDD that have capacity >2.5 million Mg must file this report. This number is based on data from the 2016 Landfills NSPS/EG database.

Table 4: Universe of Existing Landfills Subject to Emission Guidelines and Compliance Standards, Landfills and Subject to State Plan or Federal Plan (40 CFR Part 60, Subpart Cf) (Renewable Energy)

Burden Item		3-Year Average Number of Respondents	State/Local Agency
			% Respondents ^a
1.	Familiarization with regulatory requirements (State/Local Agencies and EPA Regions) ^b		
2.	Enter and update information into agency recordkeeping system ^c	1912	19%
3.	Required activities		
	A. Observe initial performance test	32	19%
	B. Observe surface methane monitoring quarterly	652	19%
	C. Review operating parameters	32	19%
	D. Review continuous parameter monitoring	32	19%
	E. Review notification of performance test	32	19%
4.	Excess Emissions Enforcement Activities ^d	3	19%
5.	Reporting requirements		
	A. Review initial design capacity report	55	19%
	B. Review amended design capacity report	25	19%
	C. Review annual NMOC emission rate report	58	19%
	D. Review landfill closure report	29	19%
	E. Review equipment removal report	0	19%
	F. Review Collection and Control System Design Plan	32	19%
	G. Review Revised Collection and Control System Design Plan	3.2	19%
	H. Review Initial Performance Test Report	32	19%
	I. Review Annual Report	652	19%
	J. Review Corrective Action Analysis	2	19%
	K. Review Implementation Timeline	2	19%
	L. Review Root Cause Analysis	2	19%
	M. Wet Landfills Monitoring Report	266	19%
6.	Travel Expenses for Tests Attended (EPA attends 20% of tests and surface monitoring)	137	19%

Assumptions:

^a 19% of landfills subject to Subpart Cf are in a jurisdiction covered by a State or Local Agency. The remaining 81% are administered by one of ten U.S. EPA Regions

^b As of August, 18, 2020 EPA data indicates that 8 State and local agencies enforce the State plans and two other effective by 2022. Therefore, 10 State and local agencies will be enforcing State plans. The number of respondent regions). We assume one EPA employee at each Region offices will familiarize themselves with the requirements staff transitions.

^c Every year, State and local agencies enter and update information for each of the 360 landfills that are subject to jurisdiction. The remainder of the landfills (1,552) are under the jurisdiction of the 10 U.S. EPA Regions, who will

^d We assume that 10% of landfills controlling emissions will have exceedances and require enforcement action.

**Times for Municipal Solid Waste
(val)**

Agency (State Plan)	EPA (Federal Plan)	
3-Year Average Number Respondents	% Respondents ^a	3-Year Average Number Respondents
10		10
360	81%	1,552
6	81%	26
124	81%	528
6	81%	26
6	81%	26
6	81%	26
1	81%	3
10	81%	45
5	81%	20
11	81%	47
6	81%	23
0	81%	0
6	81%	26
0.6	81%	2.6
6	81%	26
124	81%	528
1	81%	1
1	81%	1
1	81%	1
51	81%	215
26	81%	111

81% of landfills subject to Subpart Cf are

state agencies are expected to have their plans
 10 times per year is the number of EPA Regions (10
 times; of Subparts Cf and OOO each year, to account for

the standard and under State/Local agency
 will enter and update information.

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Annualized Capital/Startup Cost for One Respondent	Average Number of Respondents per Year	Total Annualized Capital / Startup Cost, (C x D) per Year	Annual O&M Costs for One Respondent
Method 25 or 25C testing costs for initial performance test ^a	\$10,067	\$1,105	32	\$35,370	\$0
Sampling probe and Method 25 or 25C testing costs for Tier 2 test ^b	\$11,104	\$2,708	29	\$78,540	\$0
Method 21 Surface Emission Monitor ^c	0	0	0	\$0	\$2,814
Portable Wellhead Monitor ^d	0	0	0	\$0	\$204
Flow Meter ^{e, f}	\$3,000	\$329	32	\$10,540	\$1,000
Thermocouple ^{e, f}	\$500	\$55	32	\$1,757	
Data Recorder ^{e, f}	\$4,500	\$494	32	\$15,811	
Totals (Rounded)				\$142,000	
Total (Rounded)					

^a This requirement applies to existing landfills requiring controls. Annualized cost is figured for method 25 or 25C test at 7% over expected lifetime of the flare or other destruction device.

^b Tier 2 testing is done by operating landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg assumed to do Tier 1 testing and 50% assumed to do Tier 2 testing. Since a Tier 2 test must be repeated every 5 years, annualized cost for conducting a method 25, method 25A or 25C test, figured at 7% over 5 years.

^c All controlled landfills must conduct quarterly surface emissions testing at all penetrations of the cover. We assume weekly \$600/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel (a) to operate the surface monitoring equipment.

^d All controlled landfills must conduct monthly wellhead monitoring.

^e Sources required to install a control system purchase and install this equipment prior to their initial performance test. All sources purchase this equipment annually. Annualized cost is figured at 7% over 15 years.

^f All sources operating controls maintain the flow meter, thermocouple, and data recorder annually at a cost of \$1,000.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents ^a	Number of Existing Respondents ^b	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	0	1,937	0	0	1,937
2	0	1,912	0	0	1,912

3	0	1,887	0	0	1,887
Average	0	1,912	0	0	1,912

^a There are no new respondents. Once a source constructs or modifies, they become subject to NSPS Subpart XXX.

^b We assume that 25 sources per year will modify and become subject to Subpart XXX. The previous ICR (2522.02) estimated respondents based on data collected during the 2016 final rule. Due to the gap year between the expiration of the previous ICR and Year 1 of this ICR, the 'Number of Existing Respondents' from the previous ICR has been adjusted to reflect the expected number of landfills controlling between years 2022 through 2024 based on projected emissions, as waste disposal quantities increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements.

Total Annual Number of Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses per Respondent	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Responses E=BxC+D
Privately-Owned Landfills				
Initial performance test report	18	1	NA	18
Initial design capacity report	15	1	NA	15
Amended design capacity report	13	1	NA	13
Report of NMOC rate (Tier 1)	8	1	NA	8
Report of NMOC rate (Tier 2)	8	1	NA	8
Landfill Closure Report	10	1	NA	10
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	18	1	NA	18
Revised C&C System design plan	1.8	1	NA	1.8
Annual Report	365	1	NA	365
Corrective Action Analysis	1	1	NA	1
Implementation Timeline	1	1	NA	1
Root Cause Analysis	1	1	NA	1
Wet Landfill Monitoring Report	175	1	NA	175
Total Responses for Privately-Owned Landfills (rounded)				635
Publicly-Owned Landfills				
Initial performance test report	14	1	NA	14
Initial design capacity report	40	1	NA	40
Amended design capacity report	12	1	NA	12
Report of NMOC rate (Tier 1)	21	1	NA	21
Report of NMOC rate (Tier 2)	21	1	NA	21
Landfill Closure Report	19	1	NA	19
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	14	1	NA	14

Revised C&C System design plan	1.4	1	NA	1.4
Annual Report	287	1	NA	287
Corrective Action Analysis	1	1	NA	1
Implementation Timeline	1	1	NA	1
Root Cause Analysis	1	1	NA	1
Wet Landfill Monitoring Report	82	1	NA	82
Total Responses for Publicly-Owned Landfills (rounded)				514
State/Local Agencies				
Review initial design capacity report	10	1	NA	10
Review amended design capacity report	5	1	NA	5
Review annual NMOC emission report	11	1	NA	11
Review landfill closure report	6	1	NA	6
Review equipment removal report	0	1	NA	0
Review Collection and Control System Design Plan	6	1	NA	6
Review Revised Collection and Control System Design Plan	1	1	NA	0.6
Review Initial Performance Test report	6	1	NA	6
Review Annual Report	124	1	NA	124
Review Corrective Action Analysis	1	1	NA	1
Review Implementation Timeline	1	1	NA	1
Review Root Cause Analysis	1	1	NA	1
Review Wet Landfills Monitoring Report	51	1	NA	51
Total Responses for State/Local Agencies (rounded)				223
Total Responses (rounded)				1,372

Respondents, Responses, and Hours					
Respondent	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
Private	1,185	635	81,015	276,036	357,051
Public	727	514	63,701	213,050	276,751
State & Local Agency	10	223	584	1,516	2,100
Total	-	1,372	145,300	490,602	635,902

(G)	(H)
Number of Respondents with O&M	Total O&M (F x G)
0	\$0
0	\$0
652	\$1,834,728
652	\$133,008
652	\$652,000
	\$2,620,000
	\$2,760,000

Respondent Counts		Respondent Costs	
Private	Public	Private	Public
18	14	\$19,895	\$15,474
8	21	\$21,666	\$56,874
365	287	\$1,027,110	\$807,618
365	287	\$74,460	\$58,548
365	287	\$365,000	\$287,000
18	14	\$15,810	\$12,297
Capital/Startup		\$57,372	\$84,645
O&M		\$1,466,570	\$1,153,166
Total		\$1,520,000	\$1,240,000

over 15 years, which is the

3. Of these 58 landfills, 50%
zed capital cost is based on the

equipment rental costs at
t a cost of \$103.50 per event) to

rces operating controls maintain

Hours/response 464

Hours per Response	Hours Per Respondent
562	301
538	381
9	210
463.5	-

QA check

\$35,370

\$78,540

\$1,834,728

\$133,008

\$652,000

\$28,108

\$142,017

\$2,619,736

\$2,760,000