

**SUPPORTING STATEMENT FOR
LANDFILL METHANE OUTREACH PROGRAM,
EPA INFORMATION COLLECTION REQUEST NUMBER 1849.10**

December 2021

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

This renewal information collection is entitled “Landfill Methane Outreach Program,” ICR number 1849.10, OMB Control Number 2060-0446.

1(b) Short Characterization/Abstract

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

The Landfill Methane Outreach Program (LMOP) is a voluntary program started in 1994 designed to encourage and facilitate the development of environmentally and economically sound landfill gas (LFG) energy projects across the United States to reduce methane emissions from landfills. LMOP does this by educating local governments and communities about the benefits of LFG recovery and use; building partnerships between state agencies, industry, energy service providers, local communities, and other stakeholders interested in developing this valuable resource in their community; and providing tools to evaluate LFG energy potential. LMOP’s actions will support the White House *U.S. Methane Emissions Reduction Action Plan*, to achieve further reductions from landfills in the United States.

To continue to be successful it is critical that LMOP gather information from its Partners about their activities and how the program can improve its support to them. Additionally, for LMOP to improve the data quality in one of its critical program resources, the LMOP Landfill and LFG Energy Project Database (LMOP Database), LMOP must gather basic physical and operational data from municipal solid waste (MSW) landfills and Partner organizations. Improving the data quality in this database will enable LMOP to identify landfills that are good candidates for LFG energy projects, improve estimates of methane emissions from landfills, and help LMOP and its Partners prioritize LFG energy project development assistance activities.

Partners are entities that have volunteered to participate in LMOP. LMOP classifies these Partners into one of five categories: Community Partners, State Partners, Industry Partners, Energy Partners, and Endorsers. There are three general categories of information collected from the Partners:

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

As described in the 2019 ICR renewal, LMOP developed electronic data collection to replace the previous data collection method of emailing Excel spreadsheets to respondents. In 2018, LMOP

transitioned to collecting information on LFG energy project and landfill data via electronic collection through the Agency's electronic Greenhouse Gas Reporting Tool (e-GGRT) system. The Program received authorization for this non-substantive change from OMB on August 29, 2018. The burden estimates for this ICR renewal reflect continued use of this electronic collection method. The switch to electronic data collection has shown great efficiency improvements for the agency, and this ICR renewal reflects decrease in Agency burden to complete the task of updating LFG energy and landfill data. Using the electronic data collection system saves the agency 250 hours each year for this subtask.

LMOP expects increased participation in coming years as the program supports the goals of the White House *U.S. Methane Emissions Reduction Action Plan*¹. LMOP will focus on achieving progress towards the goal of 70% of landfill methane generated in the U.S. being captured and destroyed by voluntary means through the partnership program. LMOP expects an increase in new community, industry, and endorser Partners. The LMOP information collection is expected to involve an average of 1,128 existing Partners and an additional 53 new Partners per year. As a result of this increased participation, the overall respondent burden has increased 10% from the 2019 approved ICR renewal, but the burden per individual respondent is unchanged, and participation in any of the collection activities of LMOP remain voluntary.

In addition to the LMOP data collection, as a service to Partners of the non-CO₂ voluntary programs such as LMOP, AgSTAR, Coalbed Methane Outreach Program (CMOP), and SF₆ Emission Reduction Partnership for Electric Power Systems (EPS), EPA will maintain a "service provider directory" to share information on services and technologies available to companies seeking to reduce emissions from their operations. Service provider companies fill out a short form one time to be included on the directory. EPA does not endorse any company or product in the directory.

This ICR provides a comprehensive description of the information collections under LMOP and non-CO₂ voluntary programs. Sections 1 through 5 of this ICR describe the specific information collections (e.g., from the standpoint of need, use, and respondent activities). In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency under these collections.

2. NEED FOR AND USE OF THIS COLLECTION

2(a) Need/Authority for the Collection

EPA needs to collect the information in the MOU to formally establish participation in LMOP and to obtain general information about new Partners. Additional LFG energy project and landfill data collected

¹ <https://www.whitehouse.gov/wp-content/uploads/2021/11/US-Methane-Emissions-Reduction-Action-Plan-1.pdf>

from certain types of Partners is needed to allow EPA to track, facilitate, and encourage the implementation of LFG energy projects. This information collection will assist LMOP in decreasing methane emissions from landfills, increasing the use of landfill gas as a renewable energy resource, and reducing emissions due to the burning of non-renewable energy resources such as coal and fuel oil.

All participants, in completing the MOU, agree to provide EPA with information requested in the MOU and provide contact information for LMOP. Industry and Energy Partners agree to provide information on LFG energy projects with which they have been involved. Community Partners agree to provide information on the progress of implementing LFG energy projects at their landfill(s).

2(b) Practical Utility/Users of the Data

EPA uses information submitted in the MOU to update its database of LMOP Partners. The database serves as a source of general information and an electronic mailing list. EPA uses LFG energy project and landfill data submitted by Industry, Energy, and Community Partners to monitor the progress of LFG energy projects and identify opportunities for new projects. EPA also uses the data to update the LMOP Database, which is used to prepare reports on LFG energy projects and the progress of LMOP. EPA uses case studies of successful LFG energy projects to demonstrate to existing and potential Partners the cost savings and environmental benefits associated with capturing and using LFG. Data files containing general information about the Partners, operational and under construction LFG energy projects, and landfills that may have potential for developing LFG energy projects are provided on the LMOP website, making the information available to other LMOP Partners and the public. These data files were downloaded from the LMOP website over 18,000 times during calendar year 2020.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

For new Partners, the information to be collected has not previously been collected by EPA or any other Federal Agency. For existing Partners with LFG energy projects, some of the information requested may be available in the existing LMOP Database. To avoid requesting information that has already been collected, data available to review annually on projects and landfills in the electronic system are pre-populated with information from the LMOP Database. LMOP partners are requested to review the information in this electronic data collection system (e-GGRT). The recipients are requested to provide updated or additional information only if the information is incorrect or incomplete.

In 2011, EPA began annually collecting certain technical and informational data from MSW landfills

under the Greenhouse Gas Reporting Program (GHGRP) 40 CFR part 98, subpart HH. Where data fields overlap (e.g., landfill open and closure years, landfill design capacity, amount of LFG collected), EPA updates the LMOP Database with data from the GHGRP. LMOP pre-populates the data fields with applicable data from GHGRP, subpart HH. Where LMOP Partners and those entities covered under GHGRP, subpart HH, are the same organizations, LMOP does not request the same data.

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

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR Renewal through an announcement in the Federal Register on July 26, 2021 (86 FR 40044); the Agency received one comment that was non-substantive. Further comments are solicited for this renewal.

3(c) Consultations

In 2021, LMOP attempted to contact fewer than nine Partners regarding the burden of this information collection, specifically in regard to the electronic collection system (e-GGRT) which is used for collecting information from Partners on landfill and LFG energy project data. All Partners contacted had experience using the new electronic collection system during 2021. The majority of Partners contacted agreed that the estimated burden for their Partner type was what they would expect for this effort. One Partner commented that the burden estimate for gathering information was higher than the hours they spend on the task since they utilize a continuous data collecting system. It is unknown how many LMOP Partners use a similar system so no changes were made to the burden estimate for this task.

Table 1: List of Partner Consultations Made in 2021

Partner Type	Partner Organization	Comments on Burden Estimate
Community	Monroe County Solid Waste Management District, IN	Accurate
Industry	Ameren Corp	Too high
Industry	Blue Ridge Landfill Company	Accurate
Industry	Enerdyne Power Systems, Inc.	Accurate

3(d) Effects of Less Frequent Collection

The MOU’s are submitted only once by organizations that choose to become Partners of LMOP. To allow EPA to remain current on LFG energy projects, Industry, Energy, and Community Partners directly involved in projects will be asked annually to update their LFG energy project and landfill data. All

Partners may also update company and contact information periodically as needed. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program, facilitate LFG energy project implementation, and respond in a timely manner to needs of the Partners.

3(e) General Guidelines

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

3(f) Confidentiality

Participants are not required to reveal confidential business information. Additionally, participants are given specific instructions to not provide any information that they consider confidential.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the MOU, requests for LFG energy project and landfill data, or periodic information updates.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondent NAICS Codes

This information collection will encompass a wide variety of respondents. Community Partners include local agencies and municipalities that own landfills. State agencies involved in energy, air pollution, and solid waste management are represented through State Partners. Industry Partners include engine and turbine manufacturers, engineering firms, construction companies, environmental consultants, and other companies involved in the logistics of developing LFG energy projects such as law firms and financing companies. Industry Partners are further divided into two groups: (1) developers are organizations that facilitate, finance, and implement LFG energy projects; (2) non-developers are manufacturers or suppliers of equipment or expertise needed to collect and utilize LFG. Energy Partners include utility companies who purchase energy generated from landfills, power marketers, and direct end users of energy from the landfill. The direct end user category is potentially the most diverse category. Any facility located near a landfill that utilizes fuel either in manufacturing products or in heating the facility is a potential LFG end user. Endorsers are non-profit organizations coordinating with EPA to publicize and promote the use of LFG among their members or constituents. These include several trade associations representing the solid waste industry, public works, municipalities, and renewable energy. Finally, service providers of emission reduction technologies and services are included in this ICR and are

similar to Industry Partners. Table 2 provides the North American Industry Classification System (NAICS) code and description for the respondents.

Table 2: Respondents to Information Collection

Partner Type	NAICS Code	NAICS Description
Community Partners and State Partners	924	Public Administration, Administration of Environmental Quality Programs
	924110	Public Administration, Administration of Air and Water Resource and Solid Waste Management Programs
	926130	Public Administration, Regulation and Administration of Communications, Electric, Gas, and Other Utilities
Industry Partners and Service Providers		
Industry Partners and Service Providers	333611	Turbine and Turbine Generator Set Units Manufacturing
	333618	Other Engine Equipment Manufacturing
	522110	Commercial Banking
	523910	Financial Investments and Related Activities, Miscellaneous Intermediation
	541110	Offices of Lawyers
	541330	Engineering Services
	541620	Environmental Consulting Services
	562212	Administrative and Support and Waste Management and Remediation Services, Solid Waste Landfill
Energy Partners		
<i>Direct users^a</i>	221210	Natural Gas Distribution
	312120	Breweries
	314110	Carpet and Rug Mills
	322291	Sanitary Paper Product Manufacturing
	325193	Ethyl Alcohol Manufacturing
	329199	All Other Basic Organic Chemical Manufacturing
	325212	Synthetic Rubber Manufacturing
	325412	Pharmaceutical Preparation Manufacturing
	325414	Biological Product (except Diagnostic) Manufacturing
	327120	Clay Building Material and Refractories Manufacturing
	327310	Cement Manufacturing
	336111	Automobile Manufacturing
	336120	Heavy Duty Truck Manufacturing
611310	Colleges, Universities, and Professional Schools	
<i>Power marketers and utilities</i>	221121	Electric Bulk Power Transmission and Control
	221122	Electric Power Distribution
	221118	Other Electric Power Generation

Partner Type	NAICS Code	NAICS Description
Endorsers	813910	Business Associations

a. There is a wide variety of entities that could become direct LFG users. Any facility near a landfill that uses fuel is a potential direct user. A subset of the NAICS codes and descriptions from current direct energy users who are LMOP Partners are included in this table.

4(b) Information Requested

Participation in LMOP does not require any records to be kept, although Partners will likely keep copies of the MOU submitted to EPA.

(i) Completing an MOU

a. Data items:

- Name of the organization;
- Signature, including electronic signature, of authorized representative with authorized representative's printed name and the date of the signature;
- Information about the primary contact person including name, title, work address, phone number, fax number, and email address;
- Brief description of the organization;
- Organization's website address; and
- Electronic, high-resolution version of the organization's logo or seal.

b. Respondent activities:

- Review the MOU;
- Complete the MOU electronically;
- Sign and submit the form electronically to EPA; and
- File a copy of the MOU.

(ii) LFG Energy Project and Landfill Data Update

Requests for LFG energy project and landfill data are sent to Industry, Energy, and Community Partners to update existing critical LFG energy project data necessary for tracking GHG reductions from LFG energy projects.

a. Data items (not exhaustive):

- Project type
- End user of LFG energy

- Landfill waste in place
- Landfill open year
- Project start date

b. Respondent activities:

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

(iii) Information Update

All Partners may provide information through periodic updates as needed. These updates will mainly be changes to contact information for primary contacts and experts, but they can also include providing or updating a brief description of the organization which LMOP will post on the LMOP website to provide publicity and encourage networking among Partners. LMOP may also call or email a selection of Partners to confirm or update project information that LMOP has received through the media or industry contacts.

a. Data items (not exhaustive):

- Organization description
- Organization point of contact name, phone, email contact methods

b. Respondent activities:

- Gather information; and
- Provide information via the LMOP website, email, or telephone.

(iv) Service Provider Directory

As a service to partners, EPA maintains a “service provider directory” for the non-CO₂ voluntary programs (LMOP, AgSTAR, EPS, CMOP) to share information on services and technologies available to companies seeking to reduce emissions from their operations. EPA does not endorse any company or product in the directory. Contact information is provided to foster the exchange of information.

a. Data items (not exhaustive):

- Contact information
- Description of services or technology

- Website URL, phone number

b. Respondent activities:

- Gather information; and
- Complete web form

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Agency activities associated with this information collection depend on the aspect of the information collection that the agency has received. In receiving the MOU, the Agency will:

- Review the information provided;
- Sign the MOU;
- Return a copy of the signed MOU to the Partner;
- Enter the information into a database; and
- File the MOU.

In requesting and receiving LFG energy project and landfill data, the Agency will:

- Assign LFG energy projects and landfills to new Partners;
- Invite any new Partners to access the e-GGRT module;
- Manage data collection module, respond to Partner questions, and send reminder emails;
- Review and validate information provided and follow up if necessary; and
- Transfer information received in e-GGRT to the LMOP Database.

In receiving an information update from a Partner, the Agency will:

- Review the data; and
- Revise data in the database based on the update.

In initiating an information update, the Agency will:

- Call or email the Partner;
- Request updated information; and
- Revise data in the database based on the updates.

In receiving a service provider directory submission, the Agency will:

- Review forms and enter data into database.

5(b) Collection Methodology and Management

The methods selected for this information collection are chosen based on efficiency and minimization

of burden for respondents and EPA. The MOU can be accessed on the LMOP website and returned to EPA by email. General Partner information will be posted on the LMOP website where it can be reviewed for accuracy by the Partner and revised if necessary. LFG energy project and landfill data update requests will be sent to Industry (Developer), Energy, and Community Partners. All LFG energy project and landfill data updates received will be reviewed by EPA before being entered into the LMOP Database.

5(c) Small Entity Flexibility

EPA expects that some LMOP Partners are small entities. Consistent with the assumptions made in the previous ICR renewal, LMOP assumed that all State Partners, which represent State governments, are not classified as small entities since each State population is greater than 50,000. LMOP also assumed that any new Endorsers, which are non-profits, that join the program will be classified as small entities. Given the larger number of Partners in other categories, for existing Endorsers and existing and new Community, Energy, and Industry Partners, LMOP estimated small entity counts for this ICR renewal based on the distribution of small entities for each Partner type from the 2012 ICR renewal. It is assumed that the service provider companies are similar to the Industry (Non-Developer) Partner type, and these small entity estimates have been added to this ICR renewal. The results of this estimation are provided in Table 3.

Table 3: Estimate of Average Annual Small Entities for Each Respondent Category

Respondent Category	New	% of Total Category	Existing	% of Total Category
Community	1	10%	21	15%
Endorser	6	100%	39	100%
Energy	4	67%	41	40%
Industry (Developer)	4	80%	28	39%
Industry (Non-Developer)	16	64%	308	46%
Service Provider	6	60%	N/A	N/A
Total	37		437	

EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. Participation in LMOP is voluntary. Any small entity that finds the information collection overly burdensome is not required to participate.

5(d) Collection Schedule

EPA will collect general information in the MOU, which are completed and submitted by each Partner upon their agreement to participate in the program. EPA will request updates to LFG energy project and landfill data via the electronic collection method. These update requests will be completed in the e-GGRT system annually by Industry (Developer), Energy, and Community Partners. Information may also be updated periodically at the request of EPA or the Partner. Service provider directory forms are completed and submitted by new companies one time only.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

In order to obtain accurate hourly burden and cost estimates, EPA consulted with fewer than nine Partners regarding burden and cost assumptions in 2007, 2008, 2012, 2015, 2018, and 2021. For this ICR renewal, labor rates were increased to account for an increase in wages, which impacts cost estimates.

No changes were made to respondent burden estimates for any tasks for this ICR renewal. New to this ICR is the Service Provider Directory submission form, the burden estimates for this task are included in Table A-11 of Attachment A which presents the estimated average annual respondent burden and costs during the next 3-year ICR period. Table 4 presents a summary of the respondent burden.

6(b) Estimating Respondent Costs

(v) Estimating Labor Costs

For private-sector respondents (Industry and Energy Partners; service providers), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$157.84 for legal staff, \$132.10 for managerial staff, \$100.34 for technical staff, and \$68.85 for clerical staff. Legal, managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Professional, Scientific, and Technical Services (NAICS code 541000). Legal rates were based on lawyers, management wages were based on managers (all other), technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants for May 2020. A June 2021 labor rate for all rates was estimated by applying a 1.0% growth factor from the Employment Cost Index to account for increases in wages from September 2020 to June 2021. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at <http://www.bls.gov/news.release/eci.t02.htm>.

For public-sector respondents (Community and State Partners), EPA used the same labor rates used

for EPA personnel (see Section 6(c)). These rates are comparable to rates provided by a Community Partner in 2000 and using them for all public-sector employees provides consistency.

For non-profit sector respondents (Endorsers), EPA used a national average hourly labor rate (hourly rate plus 110% overhead) of \$133.01 for managerial staff, \$105.89 for technical staff, and \$69.32 for clerical staff. Managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for Business, Professional, Labor, Political, and Similar Organizations (NAICS code 813900). Management wages were based on managers (all other), technical wages were based on engineers (all other), and clerical rates were based on executive secretaries and administrative assistants for May 2020. A June 2021 labor rate for all rates was estimated by applying a 1.7% growth factor from the Employment Cost Index to account for increases in wages from September 2020 to June 2021. The Employment Cost Index for wages and salaries, by ownership, occupational group, and industry is located at <http://www.bls.gov/news.release/eci.t02.htm>.

(vi) Estimating Capital and Operations and Maintenance Costs

Because this information collection requires respondents only to provide information that is already available to them, there are no capital costs. Similarly, EPA does not expect any operations and maintenance (O&M) costs for postage under this information collection as all responses are expected to be submitted by email or other electronic submittal.

Table 4: Summary of Respondent Burden

Hours - Average Annual Burden	Existing	New	Total – all years
Community	598.0	65.0	1,989
Endorser	9.8	10.5	61
Industry Non-Developer	435.0	65.0	1,500
Energy and Industry-Project Developer	1198.5	92.8	3,874
State	7.5	1.5	27
Service Provider	N/A	10.0	30
Total Hours	2248.8	244.8	7,481
Average Burden per Respondent	2.0	2.6	--
Cost - Average Annual Burden	Existing	New	Total – all years
Community	\$36,772	\$3,877	\$121,947

Endorser	\$1,032	\$1,084	\$6,348
Industry Non-Developer	\$43,650	\$7,244	\$152,683
Energy and Industry-Project Developer	\$123,248	\$9,799	\$399,140
State	\$435	\$83	\$1,556
Service Provider	N/A	\$1,321	\$3,963
Total Cost	\$205,138	\$23,408	\$685,636
Average Cost per Respondent	\$182	\$252	--
Total O&M Cost			\$0

6(c) Estimating Agency Burden and Costs

Attachment B presents the estimated Agency burden hours and costs for the information collection activities associated with LMOP. Table 5 presents a summary of the agency burden. EPA estimates an average hourly labor cost (labor plus 60% for overhead) of \$84.69 for managerial staff, \$58.06 for technical staff, and \$23.31 for clerical staff. To derive these estimates, EPA used the “Salary Table 2021 - GS” from the Department of Personnel Management, available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/GS_h.aspx. For purposes of this ICR, EPA assigned staff the following government service levels:

- Managerial Staff - GS-15, Step 1
- Technical Staff - GS-12, Step 5
- Clerical Staff - GS-5, Step 1

Table 5: Summary of Agency Burden

	2022	2023	2024	Average	Total
Hours	665	674	682	674	2,021
Cost	\$38,070	\$38,552	\$39,035	\$38,552	\$115,657

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

The growth in new LMOP Partners joining the program has generally remained consistent since the last ICR renewal. As explained in Section 1(b), EPA estimates during the next 3-year ICR period that 53

new Partners will join the program per year and 15 Partners will leave the program per year, for a net increase of 38 Partners per year. It is expected that approximately 100 new service providers will submit the service provider directory form in 2022 for the first year of adding this feature. In subsequent years we estimate about 10 new service providers per year. Table 6 presents a summary of the respondent universe for the next 3-year ICR period. The burden estimates are based on the total respondent universe. The number of average annual responses is 753, as detailed in Table 7.

Table 6: Summary of LMOP Partners and Other Respondents

Respondent Type	2022		2023		2024		Average	
	Existing	New	Existing	New	Existing	New	Existing	New
Community	145	10	154	10	163	10	154	10
Endorser	45	6	51	6	57	6	51	6
Energy	107	6	111	6	115	6	111	6
Industry - Non-Developer	680	25	695	25	710	25	695	25
Industry - Developer	74	5	77	5	80	5	77	5
State	39	3	40	3	41	3	40	3
Service Provider	N/A	100	N/A	10	N/A	10	N/A	40
TOTAL	1,090	153	1,128	63	1,166	63	1,128	93

Table 7: Summary of Average Annual Responses

(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)+D
MOUs	53	1	N/A	53
LFG energy project and landfill data updates	363	1	N/A	363
Information Updates	297	1	N/A	297
Service Provider Directory	40	1	N/A	40
			Total	753

6(e) Bottom Line Burden Hours and Cost Tables

Over the 3-year period covered by this ICR, EPA estimates the total respondent burden of the program to be 7,481 hours at a labor cost of \$685,636. EPA estimates the total Agency burden to be 2,021 hours at

a labor cost of \$115,657. The annual respondent burden, averaged over the 3-year period, is 2,494 hours at a labor cost of \$228,545, and the annual Agency burden, averaged over the 3-year period, is 674 hours at a labor cost of \$38,552.

The total burden for existing Partner respondents will increase gradually over each year of the 3-year ICR period to reflect an increase in the total number of existing Partners, although the burden per respondent will remain constant. The burden and costs shown for each existing Partner category in Attachment A reflect the average number of Partners during the 3-year ICR period. The bottom-line burden for new respondents will stay the same for each year of this ICR, since the number of new Partners and new service providers each year is expected to remain relatively constant over the 3-year ICR period.

6(f) Reasons for Change in Burden

Under this ICR renewal, the total respondent burden over the 3-year period is 7,481 hours, or an average of 2,494 hours per year. The 2019 ICR total respondent burden was 6,809 hours, or an average of 2,273 hours per year.

The estimated burden increase for respondents is due to anticipated increase in new Partners as explained in Section 1(b). The burden estimates per task have not changed for the respondent collection activities under this ICR.

Under this ICR renewal, the total agency burden over the 3-year period is 2,021 hours, or an average of 674 hours per year. The 2019 ICR total agency burden was 2,772 hours, or an average of 924 hours per year.

The decrease in agency burden is due to reduction of hours needed to complete the task of updating LFG energy and landfill data via the e-GGRT module. Since the 2019 ICR renewal, LMOP has completed three years of data collection via this electronic system and seen great improvements in task efficiency, especially in preparing the data to send to Partners for review and integrating the data updates into the LMOP Database upon receipt from Partners. Using e-GGRT has saved numerous hours of spreadsheet drafting and manual review. Changes in the data contributed by the Partners are now flagged automatically so that time is not spent comparing “before” and “after” spreadsheets. The LMOP team focuses on quality review of the data received and can ensure more accurate data inputs for the LMOP Database.

6(g) Burden Statement

The overall annual public reporting and recordkeeping burden for this collection of information is estimated to average 3.3 hours per response.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, and disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID EPA-HQ-OAR-2003-0078. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA WJC West Building, Room 3334, 1301 Constitution Ave., NW, Washington, D.C. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding federal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Air and Radiation Docket is 202-566-1742.

Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2003-0078 and OMB Control Number 2060-0446 in any correspondence.

Part B of the Supporting Statement

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

ATTACHMENT A - ESTIMATED AVERAGE RESPONDENT BURDEN AND COST

A-1 Existing State Partners

A-2 New State Partners

A-3 Existing Endorsers

A-4 New Endorsers

A-5 Existing Industry (Non-Developer) Partners

A-6 New Industry (Non-Developer) Partners

A-7 Existing Community Partners

A-8 New Community Partners

A-9 Existing Energy and Industry (Developer) Partners

A-10 New Energy and Industry (Developer) Partners

A-11 Service Provider

ATTACHMENT B - ESTIMATED AGENCY BURDEN AND COST

B-1 Agency Burden 2022

B-2 Agency Burden 2023

B-3 Agency Burden 2024