

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal), EPA ICR Number 2522.04, OMB Control Number 2060-0720.

1(b) Short Characterization/Abstract

Previously, the EPA-issued New Source Performance Standards (NSPS) and Emission Guidelines (EG) and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW and 40 CFR Part 60, Subpart Cc), as promulgated on March 12, 1996; and revised on both June 16, 1998; and February 24, 1999. The Federal plan requirements implementing the regulations were published at 40 CFR Part 62, Subpart GGG and promulgated on November 8, 1999. On August 29, 2016 (81 FR 59332), EPA finalized a new NSPS subpart (40 CFR Part 60, Subpart XXX) based on its review of 40 CFR Part 60, Subpart WWW. Subpart XXX applies to MSW landfills that are new, reconstructed, or modified after July 17, 2014; and is effective as of October 28, 2016. Concurrently, EPA finalized revised Emissions Guidelines under a new subpart (40 CFR Part 60, Subpart Cf). The new Emission Guidelines apply to existing landfills accepting waste after November 8, 1987, for which construction was commenced either on or before July 17, 2014. The revised guidelines are implemented under state or federal plans. The EPA subsequently finalized a federal plan implementing 40 CFR Part 60, Subpart Cf under a new subpart (40 CFR Part 62, Subpart OOO) on May 21, 2021. This ICR includes burden for MSW landfills that are subject to the requirements of Subpart Cf, which are implemented under State plans and a Federal plan (40 CFR part 62, subpart OOO). All MSW landfills that are subject to the original NSPS (40 CFR part 60, subpart WWW), the federal plan (40 CFR part 62, subpart GGG), or a state plan implementing the original emission guidelines (40 CFR part 60, subpart Cc) were required to comply with their current requirements unless and until they are covered by a more stringent State or Federal plan implementing the emission guidelines in subpart Cf. Since EPA has finalized the federal plan at 40 CFR Part 62, Subpart OOO, all respondents previously subject to Subpart WWW, a state plan implementing Cc, or GGG are now subject to either a State plan implementing 40 CFR Part 60, Subpart Cf or must now comply with the Federal plan under 40 CFR Part 62, Subpart OOO, or if they have modified since July 17, 2014, they must now comply with the NSPS at 40 CFR Part 60, Subpart XXX.

Subpart Cf reduces the NMOC emission rate threshold from the previous level of 50

megagrams per year (Mg/yr) to 34 Mg/yr for landfills that are not closed as of August 29, 2016. The final rule retained the design capacity cutoff of 2.5 million Mg and 2.5 million cubic meters in the current emission guidelines. Closed landfills retain the same NMOC threshold of 50 Mg/yr as was the case under Subpart WWW. Closed landfills are also exempted from the one-time reporting requirements, provided the landfill fulfilled these requirements under the NSPS (40 CFR Part 60, Subpart WWW), the federal plan (40 CFR Part 62, Subpart GGG), or a state plan implementing 40 CFR Part 60 Subpart Cc. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO.

In general, all Emission Guidelines require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to Emission Guidelines.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

EPA estimates that an average of 1,887 respondents per year will be subject to these regulations in the next three years. These 1,887 municipal solid waste landfills, which are owned and operated by either public and private landfill owners (the "Affected Public"), consist of 1,170 privately-owned facilities which are for-profit businesses and 717 publicly-owned facilities. We assume that they will all respond to EPA inquiries. The 'burden' to the Affected Public may be found in: 1) 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal); and 2) 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

This ICR adjusts the number of respondents subject to the requirements of Subpart Cf which are implemented under State plans and a Federal plan (40 CFR Part 62, Subpart OOO). For landfills covered by a State plan, both State and local agencies are the "implementing

agency,” and will incur a burden through the review of reports submitted to them in accordance with the State plan. We assume approximately 23 percent of landfills (440 MSW landfills) are subject to State plans, and that 11 State and local agencies will enforce the State plans. The “burden” to State and local agencies is attributed entirely to work performed by either State and/or local employees and is provided in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan and 40 CFR Part 62, Subpart OOO) (Renewal).

For landfills covered by the Federal plan, EPA is the implementing agency. The Federal plan is finalized at 40 CFR Part 62, Subpart OOO. We assume 77 percent of landfills (approximately 1,447 MSW landfills) are subject to the Federal Plan. The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors or to state or local agencies that have been delegated authority and may be found in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

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

Over the next three years, an average of 1,887 respondents per year will be subject to these standards and no additional respondents per year will become subject to these same standards. This total (1,887 respondents) includes an average of 25 respondents per year who will modify their facilities and cease being subject to these same standards over the three-year period of this ICR. This reflects updates to the respondent inventory to reflect the expected number of landfills controlling between years 2023 through 2025 based on projected emissions, as well as the number of landfills subject between years 2023 and 2025, based on waste disposal quantities which increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements.

The active (previous) ICR had the following Terms of Clearance (TOC):

“Due to lack of response to OMB during the review, this OMB control number is approved for a one-year. Upon resubmission, the program must use the standard 18 question Supporting Statement format. Per 5 CFR 1320(a)(1)(iii)(G) the agency is reminded to provide OMB with a copy of the statutory or regulatory authority to collect information. In addition, the agency must provide OMB with all of the ICs including instructions.”

The EPA believes this supporting statement contains all the information mentioned in the standard 18 question Supporting Statement format, even though that format is not yet available.

That format is to be ready by January 2024; renewals for this rule – and others – are to use that format then and subsequently. The statutory authority for EPA to collect this information is provided under 42 U.S.C. §§ 7411 and 7413 of the Clean Air Act (CAA), as provided in the regulations published at 86 FR 27756 and 81 FR 59276. CAA requirements are made available at <https://www.epa.gov/clean-air-act-overview/clean-air-act-title-i-air-pollution-prevention-and-control-parts-through-d>. The regulations at 40 CFR part 60, subpart Cf and 40 CFR part 62, subpart OOO are available in the electronic CFR (<https://www.ecfr.gov/>). This ICR describes all relevant requirements of the information collection. There are currently no electronic reporting forms required for 40 CFR 60, subpart Cf or 40 CFR 62, subpart OOO. Additional information regarding the information collections (ICs) are include in sections 2(b) and 4(b) of this document.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

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

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

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

Section 129(a)(2) states:

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

Section 129(b)(1) states:

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

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

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator

shall prescribe);
(E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
(F) submit compliance certifications in accordance with section 114(a)(3); and
(G) provide such other information, as the Administrator may reasonably require;

In the Administrator's judgment, NMOC emissions from municipal solid waste landfills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the Emission Guidelines and Compliance Times were promulgated for this source category at 40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

The required annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of NMOC emission rate reports required in 40 CFR 62.16724(c), annual reports required in 40 CFR 62.16724(h), initial performance test reports required in 40 CFR 62.16724(i), and performance test reports required in 40 CFR 62.16724(j)(1) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For

annual reports, EPA is developing a template for the reporting form in CEDRI specifically for 40 CFR Part 62, Subpart OOO. For the NMOC emission rate reports required in 40 CFR 62.16724(c), owners and operators would be required to upload the report in any electronic file format consistent with the CEDRI website.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO performance test reports in 40 CFR 62.16724(i) and 62.16724(j)(1) be submitted through the EPA's ERT.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO.

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to either the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (87 FR 43843) on July 22, 2022. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information is based on the database "*Summary of Updated Landfill Dataset Used in the Cost and Emission Reduction Analysis of Landfills Regulations, 2016*" developed for the 2016 rule. The 2016 database included data from 40 CFR part 98, Subpart HH of the EPA Greenhouse Gas

Reporting Program (GHGRP), which was supplemented with a database maintained by EPA's Landfill Methane Outreach Program (LMOP), as well as for information received from EPA's Regional Offices and state authorities. The number of respondents has been adjusted in this ICR to reflect the expected number of landfills controlling between years 2023 through 2025, as well as for the number of landfills becoming subject to Subpart Cf between years 2023 and 2025, based on waste disposal quantities which increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements. There are no new affected facilities since modified sources are not subject to Subpart Cf or Subpart OOO. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 1,887 respondents will be subject to these standards over the three-year period covered by this ICR. This ICR also adjusts the number of respondents subject to the requirements of Subparts Cf which are implemented under both State plans and a Federal plan. The Federal plan is finalized at 40 CFR Part 62, Subpart OOO. The EPA assumes that 23 percent of sources (440) are covered by the State plans. As of August 18, 2022, EPA data indicates that 11 State and local agencies enforce the State plans. The remainder of these landfills (1,447) will be covered by a Federal plan once it becomes effective.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Solid Waste Association of North America (SWANA), at 800-467-9262, and the National Waste and Recycling Association (NWRA), at 202-244-4700.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and

notifications for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are municipal solid waste landfills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes for municipal solid waste landfills are shown in the table below:

Standard (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO)	SIC Codes	NAICS Codes
Solid Waste Landfill	4953	562212
Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO).

A source must make the following reports:

Notifications and Reports	
Initial and amended design capacity report	§60.33f(d), §60.38f(a), §60.38f(b), §62.16724(a) and (b)
Initial and annual NMOC emission rate reports (electronic submittal)	§60.33f(e), §60.38f(c), §62.16724(c)
Initial collection and control system design plans	§60.38f(d), §62.16724(d)
Landfill closure report	§60.38f(f), §62.16724(f)
Equipment removal report	§60.38f(g), §62.16724(g)
Annual operations report (electronic submittal)	§60.8, §60.38f(h), §62.16724(h)
Initial performance test report (electronic submittal)	§60.8, §60.38f(h), §60.38f(i), §62.16724(i)
Electronic reporting	§60.38f(j), §62.16724(j)
Corrective action analysis	§60.38f(k), §62.16724(k)
Implementation timeline	§60.38f(k), §62.16724(k)
Root cause analysis	§60.38f(k), §62.16724(k)
Liquids addition (Wet landfill annual report)	§60.38f(l), §62.16724(l)
Notifications of SEM prior to Tier 4	§60.38f(m), §62.16724(m)

Notifications and Reports	
Notification of meeting Tier 4	§62.16724(n)
Notification of failing to meet an increment of progress	§62.16724(o)
Alternate dates for increments 2 and 3	§62.16724(p)
High temperature report for sources complying with NESHAP provisions	§60.38f(n), §62.16724(q)

A source must keep the following records:

Recordkeeping	
Maintain records of maximum design capacity, refuse-in-place, year-by-year waste acceptance rate (maintain for 5 years)	§60.39f(a), §62.16726(a)
Maintain records of control system design and initial performance test/compliance determination (must be kept for life of the control equipment; records of subsequent tests must be maintained for 5 years)	§60.39f(b), §62.16726(b)
Maintain records of equipment operating parameters specified to be monitored in §60.37f or §62.16722 for five years	§60.39f(c), §62.16726(c)
Maintain records of collection system plot map and well locations for the life of the landfill (for life of the collection system)	§60.39f(d), §62.16726(d)
Maintain records of collection and control system exceedances and monitoring data for 5 years	§60.39f(e), §60.39f(h), §62.16726(e), §62.16726(h)
Maintain records of root cause analysis conducted, corrective action, and implementation timeline	§60.39f(e), §62.16726(e)
Maintain records of annual recalculation of site-specific density and design capacity	§60.39f(f), §62.16726(f)
Maintain records of all surface emissions monitoring for 5 years (for landfills opting to use the Tier 4 approach)	§60.39f(g), §62.16726(g)
Maintain records of any engineering calculations or company records used to estimate quantities of leachate of liquids added	§60.39f(j), §62.16726(j)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal

automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Electronic reporting provisions were included in: 40 CFR Part 60, Subpart Cf, promulgated on August 29, 2016; and in 40 CFR Part 62, Subpart OOO, promulgated on May 21, 2021. Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of certain reports through EPA’s CEDRI. The notification is an upload of their currently required notification. The EPA is developing an electronic template for the reporting form for the annual reports required in 40 CFR 62.16724(h) in CEDRI, which will be made available on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The date the report template becomes available will be listed on the CEDRI website. Facilities must use the electronic reporting template for this subpart once the reporting template has been available on the CEDRI website for 90 days. The template is an Excel spreadsheet which can be partially completed and saved for subsequent annual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Calibrate and operate surface emission monitoring equipment for quarterly monitoring and portable LFG emission analyzer equipment for monthly wellhead monitoring.
Estimate NMOC emissions using Tier 1, Tier 2, Tier 3 or Tier 4 procedures in the regulation.

Respondent Activities
Perform initial performance test, Reference Method 2, 2E, 3, 3A, 3C, 18, 21, 25, 25A, 25C, or ASTM D6522-11 test, and repeat performance test if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Observe initial performance tests, repeat performance tests and quarterly surface emissions monitoring (or Tier 4) if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, root cause and corrective action analysis, implementation timeline, and wet landfill monitoring report required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to

determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve, and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

The EPA has determined that approximately 7%, or 82 of the 1,170 privately-owned existing landfills and approximately 4%, or 29 of the 717 publicly-owned existing landfills subject to similar regulations (40 CFR Part 60 Subparts WWWW and Cc or the corresponding state or federal plan) are small entities based on the ownership profiles of landfills in its regulatory database developed for the 2016 rule. The percentage of small private and public entities was determined based on the percentages of small entities determined in final rule.

Subpart Cf does not contain any provisions reserved exclusively for the benefit of small entities. However, there are several compliance flexibilities that benefit all landfills, including small entities. First, the finalized subpart included a separate subcategory for closed landfills. This subcategory retains an emission threshold of 50 Mg/yr, which is currently promulgated in similar regulations. Landfills in this category are also exempt from many of the one-time reporting requirements, provided those reports were submitted under 40 CFR part 60, Subparts WWWW and Cc or the corresponding state or federal plan. Landfills in the closed landfill subcategory are also exempt from the annual wet landfill report. Second, while these standards continue to require monthly monitoring of wellhead parameters, the EPA removed the wellhead operating standards for oxygen/nitrogen, which reduces the corrective actions, re-monitoring, and requests for alternative timelines. Third, the final rule provided a non-numeric definition of treatment, which is expected to provide some flexibility for landfills with LFG energy recovery. Since treatment is one of the three compliance pathways for controlling LFG, this ICR does not estimate the number of landfills that may opt to use the treatment pathway for compliance. Finally, the final rule included alternative site-specific emission thresholds for determining when a landfill must install (Tier 4) controls, which is expected to provide flexibility for landfill owners/operators required to control under Subpart Cf. The ICR burden was estimated assuming 50% of landfills use Tier 1 and 50% use Tier 2 as it is unknown how many landfills would opt to

use Tier 4.

Subpart Cf does not contain any provisions reserved exclusively for the benefit of small entities. However, the design capacity threshold of 2.5 million megagrams and 2.5 million cubic meters limits the effect of this regulation on smaller landfills, which tend to be disproportionately owned by smaller entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal) and 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1A and 1B document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the subparts included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of 'Burden' under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

Table 1C documents the computation of annual burden for State and local agencies that implement and enforce the State plan. State and local agency 'burden' is expressed under standardized headings, which are believed to be consistent with the concept of 'Burden' under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. On average, 11 State/local agencies will be enforcing State plans that cover 440 landfills affected by State plans. State and local agencies conduct the same activities as EPA.

In total, the emission guidelines for MSW landfills are estimated to affect an average of 1,887 landfills. Of these, 1,447 are affected by the Federal plan and 440 are affected by State plans.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 603,000 hours (Total Labor Hours from Tables 1A and 1B). The average annual burden to State and local agencies that implement and enforce State plans is 2,260 hours (Total Labor Hours from Table 1C below). State and local agencies conduct the same activities as the EPA. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the Emission Guidelines program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates for employees at publicly and privately-owned landfills:

Managerial	\$130.96 (\$62.36 + 110%)
Technical – Civil Engineer	\$96.41 (\$45.91 + 110%)
Technical – Civil Engineer Technician	\$58.57 (\$27.89 + 110%)
Clerical	\$39.38 (\$18.75 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2021, “National Occupational Employment and Wage Estimates United States”. The rates are for: 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees. For public-sector respondents (i.e., publicly-owned or -operated landfills), it was assumed that the work performed will be completed by private contractors.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring at the flare station, quarterly surface monitoring, monthly wellhead monitoring, and conducting a Tier II NMOC emission rate test. The capital/startup costs are one-time costs when a facility becomes subject to these regulations or when the facility first installs controls. The capital costs from the final rule were annualized over the five-year period allowed before another Tier II test must be conducted. While the final rule allowed landfills to conduct Tier 3 or Tier 4, industry experience suggests that no landfills are using the Tier 3 approach and it is unknown how many landfills would use the Tier 4 alternative. The capital costs for the initial performance testing and continuous monitoring equipment were

annualized over a 15-year period, consistent with the expected lifetime of the flare, and an estimated annual O&M for these pieces of equipment were also estimated based on consultation with industry on the Subpart WWW ICR renewal.

For landfills that must install gas collection and control systems, there are additional non-labor costs associated with conducting an initial (and repeat, if necessary) performance test on the flare or other destruction device, conducting quarterly surface emission monitoring (SEM), and conducting monthly wellhead monitoring. However, the final rule cost analysis assumed that the portable equipment used to complete the SEM and wellhead is rented and not purchased. Based on industry experience, many landfills contract out monitoring services. Therefore, no capital/startup costs are estimated. The table below includes rental cost and calibration and hydrogen fuel costs for the annual O&M of SEM equipment. For wellhead monitoring, the most-recent ICR applied the full monitoring cost in terms of burden hours. Therefore, the table below only shows the O&M costs associated with the calibration gases for the wellhead monitoring device. The costs to monitor surface emissions and wellheads are also included in the annualized cost impacts analysis for the final rule.

The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs, such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs							
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
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	Number of Respondents with O&M	Total O&M (F x G)
Method 25 or 25C testing costs for initial performance test ^a	\$10,067	\$1,105	4	\$4,421	\$0	0	\$0
Sampling probe and Method 25 or 25C testing costs for Tier 2 test ^b	\$11,104	\$2,708	29	\$78,540	\$0	0	\$0
Method 21 Surface Emission Monitor ^c	0	0	0	\$0	\$2,814	652	\$1,834,728
Portable Wellhead Monitor ^d	0	0	0	\$0	\$204	652	\$133,008
Flow Meter ^{e, f}	\$3,000	\$329	4	\$1,318	\$1,000	652	\$652,000

Thermocouple ^{e, f}	\$500	\$55	4	\$220			
Data Recorder ^{e, f}	\$4,500	\$494	4	\$1,976			
Totals (Rounded)				\$86,000			\$2,620,000
Total (Rounded)							\$2,710,000

^a This requirement applies to existing landfills requiring controls. Annualized cost is figured for method 25 or 25C test at 7% over 15 years, which is the 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. Of these 58 landfills, 50% 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 capital cost is based on the 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 equipment rental costs at \$600/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel (at a cost of \$103.50 per event) 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 operating controls maintain 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.

The total capital/startup costs for this ICR are \$86,000. This is the total of column E in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$2,620,000. This is the total of column H.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$2,710,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$503,000.

This cost is based on the average hourly labor rate as follows:

Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%)

Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34 (GS-6, Step 3, \$17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 1,887 existing respondents will be subject to these standards. This total (1,887 respondents) includes an average of 25 landfills per year that will modify and cease being subject to these same standards over the three-year period of this ICR. The overall average number of respondents, as shown in the table below, is 1,887 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

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	1,912	0	0	1,912
2	0	1,887	0	0	1,887
3	0	1,862	0	0	1,862
Average	0	1,887	0	0	1,887

^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 (2522.03) 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 2023 through 2025 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.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 1,887.

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

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	2	1	NA	2
Initial design capacity report	0	1	NA	0
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	9	1	NA	9
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	2	1	NA	2
Revised C&C System design plan	0.4	1	NA	0.4
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)				585
Publicly-Owned Landfills				
Initial performance test report	2	1	NA	2

Initial design capacity report	0	1	NA	0
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	17	1	NA	17
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	2	1	NA	2
Revised C&C System design plan	0.3	1	NA	0.3
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)				447
State/Local Agencies				
Review initial design capacity report	0	1	NA	0
Review amended design capacity report	6	1	NA	6
Review annual NMOC emission rate reports (Tier 1 and Tier 2)	13	1	NA	13
Review landfill closure report	6	1	NA	6
Review equipment removal report	0	1	NA	0
Review Collection and Control System Design Plan	1	1	NA	1
Review Revised Collection and Control System Design Plan	0	1	NA	0.2
Review Initial Performance Test report	1	1	NA	1
Review Annual Report	151	1	NA	151
Review Corrective Action	1	1	NA	1

Analysis				
Review Implementation Timeline	1	1	NA	1
Review Root Cause Analysis	1	1	NA	1
Review Wet Landfills Monitoring Report	62	1	NA	62
Total Responses for State/Local Agencies (rounded)				243
Total Responses (rounded)				1,275

The number of Total Annual Responses is 1,275.

The total annual labor costs are \$41,300,000. Details regarding these estimates may be found at the end of this document in 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal) and 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

The total annual labor costs to State and local agencies is \$154,000. Details regarding these estimates may be found in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan and 40 CFR Part 62, Subpart OOO) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1A, 1B, 1C and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 603,000 hours (rounded). Details regarding these estimates may be found below in 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal) and below in 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 Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

The total annual labor hours for State/local agencies is 2,260 hours. Details regarding these estimates may be found below in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual private and public reporting and recordkeeping burden for this collection of information is estimated to average 585 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,710,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 7,330 labor hours at a cost of \$503,000; see below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

The decrease in burden from the most-recently approved ICR is due to an adjustment. The adjustment decrease in burden from the most-recently approved ICR is due to a decrease in the number of respondents. The number of respondents has been adjusted in this ICR based on the regulatory database used for the 2016 rule. The number of respondents reflects the lower expected number of landfills controlling between years 2023 through 2025 based on projected emissions, as well as for the number of landfills subject between years 2023 and 2025, based on waste disposal quantities which increase over time at active landfills. The number of respondents also assumes that, in these years, landfills will be controlling under the more stringent 34 Mg/yr requirements. The estimates also subtract out landfills expected to modify during this time period and become subject to the MSW landfill 2016 NSPS Subpart XXX instead (ICR No. 2498, OMB Control Number 2060-0697). This ICR therefore reflects a decrease in the total number of respondents subject to the rule, but a similar number of controlling landfills subject to

monitoring and testing requirements. There is a slight increase in burden for states/local agencies implementing state/local agency plans due to an adjustment increase in the number of states/local agencies that are enforcing State Plans. The decrease in burden is offset somewhat by the use of updated labor rates. This ICR uses the most up to date labor rates from the Bureau of Labor Statistics Occupational Employment and Wage Statistics (May 2021).

There is a decrease in the capital costs from the most-recently approved ICR due to a decrease in the number of respondents expected to install controls and therefore conduct initial performance tests and install monitoring equipment during the three-year period of this ICR. There is no change in the O&M costs because the number of respondents expected to maintain controls and monitoring equipment is unchanged.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 585 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2022-0435. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone

number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2022-0435 and OMB Control Number 2060-0720 in any correspondence.

Part B of the Supporting Statement

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

Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal)

Burden Item	(A) Person Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Technical Person- Hours per Responden t Per Year (A x B)	(D) Average Number of Respondents Per Year ^a	(E) Civil Engineer Technician Hours per Year (C x D)	(F) Civil Engineer Hours per Year (C x D)	(G) Managemen t Person- Hours per Year (F x .05)	(H) Clerical Person- Hours per Year (F x 0.1)	(I) Total Labor Costs Per Year ^b	Footnotes
1. Applications	NA									
2. Surveys and Studies	NA									
3. Reporting Requirements										
A. Familiarize with Rule Requirements	2	1	2	1,170	0	2,340	117	234	\$250,137	c
B. Required Activities										
1. Initial performance test report	12	1	12	2	0	24	1	2	\$2,566	d
2. Surface methane monitoring quarterly	44	4	176	365	64,240	0	0	0	\$3,762,473	e
3. Wellhead monitoring monthly	40	12	480	365	175,200	0	0	0	\$10,261,289	e
C. Create Information	Included in 3B									

D. Gather Information	Included in 3B									
E. Report Preparation										
1. Initial design capacity report	2	1	2	0	0	0	0	0	\$0	f
2. Amended design capacity report	2	1	2	13	0	26	1	3	\$2,779	g
3. Report of NMOC rate (Tier 1)	8	1	8	8	0	64	3	6	\$6,841	h
4. Report of NMOC rate (Tier 2)	12	1	12	8	0	96	5	10	\$10,262	h
5. Landfill Closure Report	1	1	1	9	0	9	0	1	\$962	i
6. Equipment Removal Report	36	1	36	0	0	0	0	0	\$0	i, j
7. Collection and Control System Design Plan	80	1	80	2	0	160	8	16	\$17,103	d, k
8. Revised C&C System design plan	20	1	20	0.2	0	5	0	0	\$519	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	\$1,053,463	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2	\$1,603	n
13. Implementation Timeline	15	1	15	1	0	15	1	2	\$1,603	n
14. Root Cause Analysis	15	1	15	1	0	15	1	2	\$1,603	n
15. Wet Landfill	15	1	15	175	0	2,625	131	263	\$280,603	o

Monitoring Report										
Subtotal for Reporting Requirements						256,976			\$15,653,807	
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	\$2,341,029	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	365	0	48,180	2,409	4,818	\$5,150,264	p
3. Recordkeeping and Data Storage (others)	4	1	4	32	0	128	6	13	\$13,683	q
E. Personnel Training	NA									
F. Time for Audits	NA									
Subtotal for Recordkeeping Requirements						80,739			\$7,504,975	
Total Labor Burden and Costs (rounded)						338,000			\$23,200,000	r
Total Capital and O&M Cost (rounded)									\$1,490,000	r
Grand Total (rounded)									\$24,700,000	r

Assumptions:

- ^a We estimate that, during the three-year period of this ICR, there will be an average of 1,887 landfills per year (1,170 privately-owned and 717 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.
- ^b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2021, “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.
- ^c We estimate that, over the three-year period of this ICR, all respondents will need to refamiliarize with the requirements of the rule. We have assumed that each respondent will take 2 hours per year to refamiliarize with the requirements.
- ^d We estimate that, over the three-year period of this ICR, an average of 4 respondents per year (2 privately-owned and 2 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.
- ^e 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 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 wellhead monitoring, the estimated burden was based on industry consultation of \$2000 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 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.
- ^f Based on the regulatory database, there are no landfills that will complete the initial design capacity report during the three-year period of this ICR. This is a one-time requirement.
- ^g 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.
- ^h 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 (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.
- ⁱ We assume that 26 controlled landfills (9 privately-owned and 17 publicly-owned) will close during the three-year period of this ICR.
- ^j 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.
- ^k 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 4 landfills per year (2 privately-owned and 2 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.

- ¹ We estimate that, over the three-year period of this ICR, an average of 4 respondents per year (2 privately-owned and 2 publicly-owned) will submit a Collection and Control System Design Plan. We have assumed that 10% of landfills installing a collection and control system will revise their collection and control system design plan. This results in submittal of 0.4 C&C System Design Plan revisions per year ($2 \times 0.1 + 2 \times 0.1 = 0.4$ revisions/year).
- ^m 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 \$5,000 per year for compliance reporting. 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 \$2,500, which is approximately 27 technical hours per occurrence.
- ⁿ 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.
- ^o 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.
- ^p 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 \$1,000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month. This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- ^q 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.
- ^r 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 Cf and 40 CFR Part 62, Subpart OOO) (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 ^a	(E) Civil Engineer Technicia n Hours per Year (C x D)	(F) Civil Engineer Hours per Year (C x D)	(G) Manageme nt Person- Hours per Year (F x .05)	(H) Clerical Person- Hours per Year (F x 0.1)	(I) Total Labor Costs Per Year ^b	Footnote ^c
1.Applications	NA									
2.Surveys and Studies	NA									
3.Reporting Requirements										
A. Familiarize with Rule Requirements	2	1	2	717	0	1,434	72	143	\$153,289	c
B. Required Activities										
1. Initial performance test report	12	1	12	2	0	24	1	2	\$2,566	d
2. Surface methane monitoring quarterly	44	4	176	287	50,512	0	0	0	\$2,958,437	e
3. Wellhead monitoring monthly	40	12	480	287	137,760	0	0	0	\$8,068,465	e
C. Create Information	Included in 3B									
D. Gather Information	Included in 3B									
E. Report Preparation										
1. Initial design capacity report	2	1	2	0	0	0	0	0	\$0	f
2. Amended design capacity report	2	1	2	12	0	24	1	2	\$2,566	g
3. Report of NMOC	8	1	8	21	0	168	8	17	\$17,959	h

rate (Tier 1)										
4. Report of NMOC rate (Tier 2)	12	1	12	21	0	252	13	25	\$26,938	h
5. Landfill Closure Report	1	1	1	17	0	17	1	2	\$1,817	i
6. Equipment Removal Report	36	1	36	0	0	0	0	0	\$0	i, j
7. Collection and Control System Design Plan	80	1	80	2	0	160	8	16	\$17,103	d, k
8. Revised C&C System design plan	20	1	20	0.2	0	4	0	0	\$408	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	\$828,339	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2	\$1,603	n
13. Implementation Timeline	15	1	15	1	0	15	1	2	\$1,603	n
14. Root Cause Analysis	15	1	15	1	0	15	1	2	\$1,603	n
15. Wet Landfill Monitoring Report	15	1	15	82	0	1,230	62	123	\$131,482	o
Subtotal for Reporting Requirements						201,045			\$12,214,180	
4. Recordkeeping Requirements										
A. Read Instructions	Included in 3a									
B. Plan Activities	NA									
C. Implement	NA									

Activities										
D. Develop Record System	NA									
E. Record Information										
1. Data Compilation and Review (controllers)	5	12	60	287	0	17,220	861	1,722	\$1,840,754	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	287	0	37,884	1,894	3,788	\$4,049,659	p
3. Recordkeeping and Data Storage (others)	4	1	4	25	0	100	5	10	\$10,690	q
E. Personnel Training	NA									
F. Time for Audits	NA									
Subtotal for Recordkeeping Requirements						63,485			\$5,901,103	
Total Labor Burden and Costs (rounded)						265,000			\$18,100,000	r
Total Capital and O&M Cost (rounded)									\$1,210,000	r
Grand Total (rounded)									\$19,300,000	r

^a We estimate that, during the three-year period of this ICR, there will be an average of 1,887 landfills per year (1,170 privately-owned and 717 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.

^b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2021, “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.

^c We estimate that, over the three-year period of this ICR, all respondents will need to refamiliarize with the requirements of the rule. We have assumed that each respondent will take 2 hours per year to refamiliarize with the requirements.

^d We estimate that, over the three-year period of this ICR, an average of 4 respondents per year (2 privately-owned and 2 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.

- ^e 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 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 wellhead monitoring, the estimated burden was based on industry consultation of \$2000 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 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.
- ^f Based on the regulatory database, there are no landfills that will complete the initial design capacity report during the three-year period of this ICR. This is a one-time requirement.
- ^g 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.
- ^h 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 (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.
- ⁱ We assume that 26 controlled landfills (9 privately-owned and 17 publicly-owned) will close during the three-year period of this ICR.
- ^j 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.
- ^k 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 4 landfills per year (2 privately-owned and 2 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.
- ^l We estimate that, over the three-year period of this ICR, an average of 4 respondents per year (2 privately-owned and 2 publicly-owned) will submit a Collection and Control System Design Plan. We have assumed that 10% of landfills installing a collection and control system will revise their collection and control system design plan. This results in submittal of 0.4 C&C System Design Plan revisions per year ($2 \times 0.1 + 2 \times 0.1 = 0.4$ revisions/year).
- ^m 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 \$5,000 per year for compliance reporting. 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.
- ⁿ 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.

- ° 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 \$1,000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month. 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 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal)

Burden Item	(A) State/Local Agency hours per occurrence	(B) Number of occurrence s per landfill per year	(C) Agency person- hours per occurrence per year (C=AxB)	(D) Landfills per Year Administere d By State/Local Agencies ^a	(E) Technic al hours per year (CxD)	(F) Manageme nt hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0. 1)	(H) Costs, \$ ^b	Footnotes
1. Familiarization with Regulatory Requirements	4	NA	4	11	44	2	4	\$2,584	c
2. Enter and update information into agency recordkeeping system	2	1	2	440	880	44	88	\$51,684	d
3. Required activities									
A. Observe initial performance test	12	0.2	2	1	2	0	0	\$141	e
B. Observe surface methane monitoring quarterly	20	0.2	4	151	604	30	60	\$35,474	e

C. Review operating parameters	1	1	1	1	1	0.1	0	\$59	f
D. Review continuous parameter monitoring	1	1	1	1	1	0.1	0	\$59	f
E. Review notification of performance test	2	1	2	1	2	0	0	\$117	f
4. Excess Emissions Enforcement Activities	24	1	24	0	0	0	0	\$0	g
5. Reporting requirements									
A. Review initial design capacity report	1	1	1	0	0	0	0	\$0	h
B. Review amended design capacity report	1	1	1	6	6	0.3	1	\$352	i
C. Review annual NMOC emission rate report	2	1	2	13	26	1	3	\$1,527	j
D. Review landfill closure report	1	1	1	6	6	0.3	1	\$352	k
E. Review equipment removal report	1	1	1	0	0	0	0	\$0	l
F. Review Collection and Control System Design Plan	15	1	15	1	15	1	2	\$881	m
G. Review Revised Collection and Control System Design Plan	5	0.1	1	0.1	0.1	0.00	0.01	\$3	n
H. Review Initial Performance Test	12	1	12	1	12	1	1	\$705	o
I. Review Annual Report	2	1	2	151	302	15	30	\$17,737	p
J. Review Corrective Action Analysis	1.25	1	1	1	1	0.1	0.1	\$73	q
K. Review Implementation Timeline	1.25	1	1	1	1	0.1	0.1	\$73	q
L. Review Root Cause Analysis	1.25	1	1	1	1	0.1	0.1	\$73	q
M. Review Wet Landfills Monitoring Report	1	1	1	62	62	3	6	\$3,641	r
6. Travel Expenses for Tests Attended	3 days * (\$154 hotel + \$69 meals/incidentals) + (\$600 round trip) = \$1269 per trip			30	NA	NA	NA	\$38,070	s
TOTAL (rounded)						2,260		\$154,000	t

Assumptions:

^a EPA estimates that an average of 1,887 MSW landfills per year are subject to the requirements of Subparts Cf which are implemented under state plans and a federal plan (40 CFR Part 62, Subpart OOO). As of August 2022, EPA data indicates that 11 States and local agencies enforce the State plans. EPA assumes that approximately 23 percent of sources (440) are covered by the State Plans. Thus, each agency is expected to review reports for an average of 40 landfills (440 / 11 = 40). The remainder of these landfills (1,447) are covered by the federal plan.

^b This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technical \$52.37 (GS-12, Step 1, \$32.73 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.71 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical

hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2022 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 This ICR estimates that staff from each State or Local Agency will familiarize themselves with the requirements of Subparts Cf and OOO each year, to account for staff transitions.

^d Every year, Agencies enter and update information for each of the 440 landfills that are subject to the standard and under State/Local agency jurisdiction.

^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. We assume 13 landfills will perform an initial performance test during the three-year period of this ICR for an average of 4.3 landfills per year. 23 percent of these landfills are in states that enforce state plans ($4.3 * 0.23 = 1$ landfill per year). The remaining 77% are in states subject to a federal plan ($4.3 * 0.77 = 3$). We expect each Agency to observe/review 20% of the initial 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, begin monitoring operating parameters, and submit an 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 (4.3), 10% of them will have exceedances and need enforcement once per year ($4.3 * 0.1 = 0.43$, rounded to 0).

^h The initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously submitted a report. Over the three-year period of this ICR, we do not expect any landfills to file this report.

ⁱ Amended design capacity reports are submitted as landfills are modified to add additional capacity. At this point, the landfill becomes subject to Subpart XXX. EPA estimates there will be an average of 25 modifications per year during the three-year period of this ICR. Of these 25 landfills approximately 23% or 6 landfills are in states that enforce state plans. Burden for the amended design capacity report is 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 reports. EPA estimates that, over the three-year period of this ICR, an average of 57 respondents per year will submit Tier 1 or Tier 2 reports. Of these, 13 are in states that enforce state plans. ($57 * 0.23 = 13$)

^k The EPA estimates that an average 26 landfills will submit a landfill closure report per year over the three-year period of this ICR. Of these, approximately 23% are in states that enforce state plans. ($26 * 0.23 = 5.98$, rounded to 6)

^l The EPA estimates that no equipment removal reports will be 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 that 13 landfills will be required to install controls during the three-year period of this ICR for an average of 4 landfills per year. 23% of these landfills are in states that enforce state plans ($4 * 0.23 = 1$ landfills per year). The remaining 77% are in states subject to a federal plan ($4 * 0.77 = 3$).

ⁿ EPA assumes that 10% 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).

^o EPA reviews all initial performance test reports. EPA assumes 13 landfills will perform an initial performance test during the three-year period of this ICR for an average of 4.3 landfills per year. 23 percent of these landfills are in states that enforce state plans ($4.3 * 0.23 = 1$ landfill per year).

^p All controlled landfills are required to submit an annual report. EPA estimates that, over the three-year period of this ICR, an average of 151 respondents per year ($652 * 0.23 = 151$) operating controlled 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 takes longer than 60 days to correct.

^r EPA assumes that, during the three-year period of this ICR, an average of 266 landfills will be required to file this report each year. Of these, 23% are in that states enforce state plans (266 * 0.23 = 62) and the remaining 204 are in states subject to a federal plan.

^s We assume State/Local agencies will attend 20% of performance tests (1 per year) and surface monitoring (151 per year). ((1 + 151) x 0.2 = 30) Total cost is based on the number of trips taken by EPA to observe performance tests and surface monitoring, multiplied by \$1,269 per trip. The source for hotel and meals/incidental costs is based on FY' 23 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-files>

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

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (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) Managemen t 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	\$2,349	c
2. Enter and update information into agency recordkeeping system	2	1	2	1,447	2,894	145	289	\$169,970	d
3. Required activities									
A. Observe initial performance test	12	0.2	2	3	7	0	1	\$423	e
B. Observe surface methane monitoring quarterly	20	0.2	4	501	2,004	100	200	\$117,699	e
C. Review operating parameters	1	1	1	3	3	0	0	\$176	f
D. Review continuous parameter monitoring	1	1	1	3	3	0	0	\$176	f
E. Review notification of performance test	2	1	2	3	6	0	1	\$352	f

4	Excess Emissions Enforcement Activities	24	1	24	0	0	0	0	\$0	g
5.	Reporting requirements									
A.	Review initial design capacity report	1	1	1	0	0	0	0	\$0	h
B.	Review amended design capacity report	1	1	1	19	19	1	2	\$1,116	i
C.	Review annual NMOC emission rate report	2	1	2	44	88	4	9	\$5,168	j
D.	Review landfill closure report	1	1	1	20	20	1	2	\$1,175	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	3	45	2	5	\$2,643	e, l
G.	Review Revised Collection and Control System Design Plan	5	0.1	1	0.3	0	0	0	\$9	m
H.	Review Initial Performance Test Report	12	1	12	3	36	2	4	\$2,114	e
I.	Review Annual Report	2	1	2	501	1,002	50	100	\$58,849	n
J.	Review Corrective Action Analysis	1.25	1	1.25	1	1	0	0	\$73	o
K.	Review Implementation Timeline	1.25	1	1.25	1	1	0	0	\$73	o
L.	Review Root Cause Analysis	1.25	1	1.25	1	1	0	0	\$73	o
M.	Wet Landfills Monitoring Report	1	1	1	204	204	10	20	\$11,981	p
6.	Travel Expenses for Tests Attended (EPA attends 20% of tests and surface monitoring)	3 days * (\$154 hotel + \$69 meals/incidentals) + (\$600 round trip) = \$1269 per trip			101				\$128,169	q
TOTAL (Rounded)							7,330		\$503,000	r

^a EPA estimates that an average of 1,887 MSW landfills per year are subject to the requirements of Subparts Cf which are implemented under state plans and a federal plan (40 CFR Part 62, Subpart OOO). As of August 2022, EPA data indicates that 11 States and local agencies enforce the State plans. EPA assumes that approximately 23 percent of sources (440) are covered by the State Plans. The remainder of these landfills (1,447) are covered by the federal plan.

^b This ICR uses the following labor rates: \$70.56 for managerial, \$52.37 for technical, and \$28.34 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2022 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 landfills per year is the number of EPA Regions (10 regions). We assume one EPA employee at each Region office will familiarize themselves with the requirements of Subpart Cf and OOO each year, to account for staff transitions.
- ^d The number of landfills 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 13 landfills, or 4.3 landfills per year, are expected to perform initial testing. Approximately 77% of these landfills ($4.3 * 0.77 = 3$) are in states subject to a federal plan. Surface methane monitoring is performed at landfills that control emissions. Of the 652 landfills that control emissions, approximately 77% of these ($652 * 0.77 = 501$) 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. $((3 + 501) * 0.2 = 101)$
- ^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 (3), 10% of them will have exceedances and need enforcement once per year. $(3 * 0.1 = 0.3, \text{ rounded down to } 0)$.
- ^h The initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously submitted a report. Over the three-year period of this ICR, we do not expect any landfills to file this report.
- 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 77% ($25 * 0.77 = 19$ 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 Annual NMOC emission rate reports are filed by uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports. EPA estimates that, over the three-year period of this ICR, an average of 57 respondents per year will submit Tier 1 or Tier 2 reports. Of these 57 landfills, 44 are located in states that subject to a federal plan. $(57 * 0.77 = 44)$
- ^k This ICR assumes that on average 26 landfills will submit a landfill closure report per year. Of these 26 landfills, 77% are in states that are subject to a federal plan ($26 * 0.77 = 20$). 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 13 landfills, or 4 landfills per year, are expected to submit a collection and control system design plan. Approximately 77% of these landfills ($4 * 0.77 = 3$) 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 501 respondents per year ($652 * 0.77 = 501$) operating controlled landfills will need to submit this report under the Federal Plan.
- ^o Number of landfills 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, 77 percent are in states subject to a federal plan. ($266 * 0.77 = 204$)
- ^q We assume EPA will attend 20% of performance tests (3 per year) and surface monitoring (501 per year). ($(3+501) * 0.2 = 101$) Total cost is based on the number of trips taken by EPA to observe performance tests and surface monitoring, multiplied by \$1,269 per trip. The source for hotel and meals/incidental costs is based on FY' 23 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-files>
- ^r Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.