

ICR Summary Information

Hours per Response	585
Number of Respondents	1887
Total Estimated Burden Hours	605,260
Total Estimated Costs	\$44,154,000
Annualized Capital O&M	\$2,710,000
Total Annual Responses	1,275
Form Number	None

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 Respondent Per Year (A x B)	(D) Average Number of Respondents Per Year*	(E) Civil Engineer Technician Hours per Year (C x D)	(F) Civil Engineer Hours per Year (C x D)	(G) Management Person-Hours per Year (F x .05)	(H) Clerical Person-Hours per Year (F x 0.1)	(I) Total Labor Costs Per Year ¹	Business
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 quarterly	12	1	12	2	0	24	1	2	\$2,566	d
2. Wellhead 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	j, k
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 Monitoring Report	15	1	15	175	0	2,625	131	263	\$280,603	o
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
F. Personnel Training	NA									
G. Time for Audits	NA									
Subtotal for Recordkeeping Requirements						80,729			\$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

Labor		
Category	Rate	Occupation Code
Management	\$130.96	11-9199
Technical - Civil Engineer	\$86.41	17-2051
Technical - Civil Engineering	\$58.27	17-2022
Clerical	\$39.38	43-9061

https://www.bls.gov/oes/current/oes_nat.html#11-0000

Assumptions:

¹ 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.

² 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.

³ We estimate that, over the three-year period of this ICR, all respondents will need to familiarize with the requirements of the rule. We have assumed that each respondent will take 2 hours per year to familiarize with the requirements.

⁴ 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.

⁵ We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to conduct quarterly surface emissions monitoring and monthly wet emissions monitoring. For surface monitoring, the average acreage of controlled sites is estimated to be 174 acres and we estimate monitoring labor at 0.25 hours per acre for a total of 44 labor hours (174 acres x 0.25 hr/acre = 43.5 hours, rounded to 44) per monitoring event. For wellhead monitoring, the estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWWW (ICR 1537-05), 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 GPCS is well-operated and the surface is well sealed.

⁶ 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.

⁷ We assume that 25 landfills per year (13 privately-owned and 12 publicly-owned) will have modifications requiring the submission of an amended design capacity report during the three-year period of this ICR. Upon modification, these landfills become subject to NSPS Subpart XXX. Burden for the amended design capacity report is calculated under Subpart Cf.

⁸ 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.

⁹ We assume that 26 controlled landfills (9 privately-owned and 17 publicly-owned) will close during the three-year period of this ICR.

¹⁰ 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.

¹¹ 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.

¹² 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 a subtotal of 0.4 C&C System Design Plan revisions per year (2 x 0.1 + 2 x 0.1 = 0.4 revisions/year).

¹³ 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 technician hours per occurrence.

¹⁴ 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 an implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct.

¹⁵ 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 62 publicly-owned landfills will be required to file this report each year.

¹⁶ 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 \$200 for data compilation and review per month. This is approximately 2 technical hours per occurrence for data compilation and review and 1.1 hours for recordkeeping and data storage.

¹⁷ 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.

¹⁸ 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)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	Total Labor Costs Per Year	Burden
	Person Hours Occurrence	Number of Occurrences Per Respondent Per Year	Technical Person-Hours per Respondent Per Year (A x B)	Average Number of Responses Per Year *	Civil Engineer Hours per Year (C x D)	Civil Engineer Hours per Year (C x D)	Management Hours per Year (F x .05)	Clerical Person-Hours per Year (F x 0.1)	Person-Hours per Year (F x 0.1)		
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		\$15,288	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		\$2,938,437	e
3. Wellhead monitoring monthly	40	12	480	287	137,760	0	0	0		\$0,060,465	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 NMOOC rate (Tier 1)	8	1	8	21	0	168	8	17		\$17,958	h
4. Report of NMOOC 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	l,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		\$826,338	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. New Landfill Monitoring Brown	15	1	15	82	0	1,230	62	123		\$11,462	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 Activities	NA										
D. Develop Record System	NA										
E. Record Information											
1. Data Compilation and Review (controllers)	5	12	60	287	0	17,220	861	1,722		\$1,840,756	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	287	0	37,884	1,894	3,788		\$4,049,658	p
3. Recordkeeping and Data Storage (others)	4	1	4	25	0	100	5	10		\$10,690	q
F. Personnel Training	NA										
G. Time for Audits	NA										
Subtotal for Recordkeeping Requirements						61,485				\$5,901,108	
Total Labor Burden and Costs (rounded)						265,000				\$18,100,000	r
Total Capital and O&M Cost (rounded)										\$121,000	s
Grand Total (rounded)										\$19,300,000	t

Labor		
Category	Rates	Occupation Code
Management	\$130.96	11-9199
Technical - Civil Engineer	\$96.41	17-2021
Technical - Civil Engineering Technician	\$58.57	17-9022
Clerical	\$19.38	43-9061

https://www.bls.gov/oes/current/oes_nat.htm#11-4000

Totals for 1A + 1B	
	Hours
602,000	
\$41,300,000	\$ Labor
\$2,710,000	\$ Capital/O&M
\$44,000,000	\$ Grand

Assumptions:
 * 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.

¹ 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 Classification and Wage Estimates: United States" for employees at privately-owned landfills: Managers, All Other for Managerial Labor, Civil Engineers, Civil Engineer Technicians, and Office Clerks, General for Clerical Labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

³ 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.

⁴ We estimate that, over the three-year period of this ICR, an average of 652 respondents per year (365 privately-owned and 287 publicly-owned) operating controlled landfills will need to conduct quarterly surface emissions monitoring and monthly well emissions monitoring. For surface monitoring, the average 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 \$200 per month during the most recent ICR renewal for subpart WVV (CR# 1557/09), or approximately 40 hours of technician labor time. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well-sealed.

⁵ Based on the regulatory database, there are no landfills that will complete the initial design capacity report during the three-year period of this ICR. This is a one-time requirement.

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

⁷ Landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg must file Tier 1 or Tier 2 reports. We estimate that, over the three-year period of this ICR, an average of 29 respondents per year (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 every 5 years for their NMOOC reports.

⁸ We assume that 26 controlled landfills (9 privately-owned and 17 publicly-owned) will close during the three-year period of this ICR.

⁹ We assume no landfills will remove control equipment during the three-year period of this ICR. Equipment Removal Report requires inclusion of 3 successive NMOOC rates using Tier 2 calculations to demonstrate a landfill is below the NMOOC threshold.

¹⁰ 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.

¹¹ We estimate that, over the three-year period of this ICR, an average of 4 respondents per year (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 a subtotal of 0.4 C&C System Design Plan revisions per year (2 x 0.1 + 2 x 0.1 = 0.4 revisions/year).

¹² 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.

¹³ 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 an implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct.

¹⁴ 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.

¹⁵ 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.

¹⁶ 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.

¹⁷ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Com CFR Part 60, Subpart Cf and 40 CFR Part 62, Subpart OOO) (Renewal)

Burden Item	(A) State/Local Agency hours per occurrence	(B) Number of occurrences per landfill per year	(C) Agency person- hours per occurrence per year (C=AxB)
1. Familiarization with Regulatory Requirements	4	NA	4
2. Enter and update information into agency recordkeeping system	2	1	2
3. Required activities			
A. Observe initial performance test	12	0.2	2
B. Observe surface methane monitoring quarterly	20	0.2	4
C. Review operating parameters	1	1	1
D. Review continuous parameter monitoring	1	1	1
E. Review notification of performance test	2	1	2
4. Excess Emissions Enforcement Activities	24	1	24
5. Reporting requirements			
A. Review initial design capacity report	1	1	1
B. Review amended design capacity report	1	1	1
C. Review annual NMOC emission rate report	2	1	2
D. Review landfill closure report	1	1	1
E. Review equipment removal report	1	1	1
F. Review Collection and Control System Design Plan	15	1	15
G. Review Revised Collection and Control System Design Plan	5	0.1	1
H. Review Initial Performance Test	12	1	12
I. Review Annual Report	2	1	2
J. Review Corrective Action Analysis	1.25	1	1
K. Review Implementation Timeline	1.25	1	1
L. Review Root Cause Analysis	1.25	1	1
M. Review Wet Landfills Monitoring Report	1	1	1
6. Travel Expenses for Tests Attended	3 days * (\$154 hotel + \$69 meals/incidentals) + (\$600 round trip) = \$1269 per trip		
TOTAL (rounded)			

Assumptions:

^a EPA estimates that an average of 1,887 MSW landfills per year are subject to the requirements of Subparts Cf which are in of August 2022, EPA data indicates that 11 States and local agencies enforce the State plans. EPA assumes that approximate expected to review reports for an average of 40 landfills (440 / 11 = 40). The remainder of these landfills (1,447) are covered

^b This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technician + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit

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

^d Every year, Agencies enter and update information for each of the 440 landfills that are subject to the standard and under

^e Initial performance tests under Subpart Cf/Subpart OOO are only needed if the landfill is not a legacy controller that had equipment that has not been tested. We assume 13 landfills will perform an initial performance test during the three-year period 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 performance tests and 20% of the surface methane monitoring tests.

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

^g The number of occurrences for enforcement is based on the assumption that of the landfills that test (4.3), 10% of them will be subject to enforcement (0.43).

^h The initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously filed a design capacity report.

ⁱ Amended design capacity reports are submitted as landfills are modified to add additional capacity. At this point, the number of amended design capacity reports 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 and are 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 emissions. 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 ($26 * 0.23 = 5.98$, 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 an average of 4 landfills per year, 23% of these landfills are in states that enforce state plans ($4 * 0.23 = 1$ landfill per year).

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

^o EPA reviews all initial performance test reports. EPA assumes 13 landfills will perform an initial performance test during the three-year period of this ICR. 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 13 landfills are in states that enforce state plans and will need to submit this report.

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

^r EPA assumes that, during the three-year period of this ICR, an average of 266 landfills will be required to file this report and the remaining 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). We assume that the cost of attending performance tests and surface monitoring, multiplied by \$1,269 per trip. The source for hotel and meals/incidental expenses is from the General Services Administration (GSA) Travel Plan Book for the United States. Airfares are estimated based on experience from other rulemakings. See: [https://www.gsa.gov/travel/plan-book/per-](https://www.gsa.gov/travel/plan-book/performance)

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

pliance Times for Existing Municipal Solid Waste Landfills (40

(D) Landfills per Year Administered By State/Local Agencies ^a	(E) Technical hours per year (CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Costs, \$ ^b	Footnotes
11	44	2	4	\$2,584	c
440	880	44	88	\$51,684	d
1	2	0	0	\$141	e
151	604	30	60	\$35,474	e
1	1	0.1	0	\$59	f
1	1	0.1	0	\$59	f
1	2	0	0	\$117	f
0	0	0	0	\$0	g
0	0	0	0	\$0	h
6	6	0.3	1	\$352	i
13	26	1	3	\$1,527	j
6	6	0.3	1	\$352	k
0	0	0	0	\$0	l
1	15	1	2	\$881	m
0.1	0.1	0.00	0.01	\$3	n
1	12	1	1	\$705	o
151	302	15	30	\$17,737	p
1	1	0.1	0.1	\$73	q
1	1	0.1	0.1	\$73	q
1	1	0.1	0.1	\$73	q
62	62	3	6	\$3,641	r
30	NA	NA	NA	\$38,070	s
		2,260		\$154,000	t

Labo
Management
Technical
Clerical

plemented under state plans and a federal plan (40 CFR Part 62, Subpart OOO). As
 23 percent of sources (440) are covered by the State Plans. Thus, each agency is
 covered by the federal plan.

Management \$52.37 (GS-12, Step 1, \$32.73 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.71
 plus technical hours. These rates are from the Office of Personnel Management (OPM), 2022
 pay fit packages available to government employees.

plus 30 days Cf and OOO each year, to account for staff transitions.

State/Local agency jurisdiction.

ir Rates
\$70.56
\$52.37
\$28.34

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) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Costs, \$ ^b	Footnotes
1. Familiarization with regulatory requirements (10 EPA Regions)	4	1	4	10	40	2	4	\$2,349	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

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. 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 Subparts 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, 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)

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Annualized Capital/Startup Cost for One Respondent	Average Number of Respondents per Year	Total Annualized Capital / Startup Cost, (C x D) per Year	Annual O&M Costs for One Respondent
Method 25 or 25C testing costs for initial performance test ^a	\$10,067	\$1,105	4	\$4,421	\$0
Sampling probe and Method 25 or 25C testing costs for Tier 2 test ^b	\$11,104	\$2,708	29	\$78,540	\$0
Method 21 Surface Emission Monitor ^c	0	0	0	\$0	\$2,814
Portable Wellhead Monitor ^d	0	0	0	\$0	\$204
Flow Meter ^{e, f}	\$3,000	\$329	4	\$1,318	\$1,000
Thermocouple ^{e, f}	\$500	\$55	4	\$220	
Data Recorder ^{e, f}	\$4,500	\$494	4	\$1,976	
Totals (Rounded)				\$86,000	
Total (Rounded)					

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

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

^c All controlled landfills must conduct quarterly surface emissions testing at all penetrations of the cover. We assume weekly cost of \$600/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel (a cost of \$1,000) 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 must replace 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.

(G)	(H)
Number of Respondents with O&M	Total O&M (F x G)
0	\$0
0	\$0
652	\$1,834,728
652	\$133,008
652	\$652,000
	\$2,620,000
	\$2,710,000

Respondent Counts		Respondent Costs	
Private	Public	Private	Public
2	2	\$2,211	\$2,211
8	21	\$21,666	\$56,874
365	287	\$1,027,110	\$807,618
365	287	\$74,460	\$58,548
365	287	\$365,000	\$287,000
2	2	\$1,757	\$1,757
Capital/Startup		\$25,634	\$60,841
O&M		\$1,466,570	\$1,153,166
Total		\$1,490,000	\$1,210,000

over 15 years, which is the

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

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

rces operating controls maintain

QA check

\$4,421

\$78,540

\$1,834,728

\$133,008

\$652,000

\$3,513

\$86,475

\$2,619,736

\$2,700,000

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
Privately-Owned Landfills			
Initial performance test report	2	1	NA
Initial design capacity report	0	1	NA
Amended design capacity report	13	1	NA
Report of NMOC rate (Tier 1)	8	1	NA
Report of NMOC rate (Tier 2)	8	1	NA
Landfill Closure Report	9	1	NA
Equipment Removal Report	0	1	NA
Collection and Control System Design Plan	2	1	NA
Revised C&C System design plan	0.2	1	NA
Annual Report	365	1	NA
Corrective Action Analysis	1	1	NA
Implementation Timeline	1	1	NA
Root Cause Analysis	1	1	NA
Wet Landfill Monitoring Report	175	1	NA
Total Responses for Privately-Owned Landfills (rounded)			
Publicly-Owned Landfills			
Initial performance test report	2	1	NA
Initial design capacity report	0	1	NA
Amended design capacity report	12	1	NA
Report of NMOC rate (Tier 1)	21	1	NA
Report of NMOC rate (Tier 2)	21	1	NA
Landfill Closure Report	17	1	NA
Equipment Removal Report	0	1	NA
Collection and Control System Design Plan	2	1	NA
Revised C&C System design plan	0.2	1	NA
Annual Report	287	1	NA
Corrective Action Analysis	1	1	NA
Implementation Timeline	1	1	NA
Root Cause Analysis	1	1	NA
Wet Landfill Monitoring Report	82	1	NA
Total Responses for Publicly-Owned Landfills (rounded)			
State/Local Agencies			
Review initial design capacity report	0	1	NA
Review amended design capacity report	6	1	NA
Review annual NMOC emission rate	13	1	NA
Review landfill closure report	6	1	NA
Review equipment removal report	0	1	NA
Review Collection and Control System	1	1	NA

Review Revised Collection and Control System Design Plan	0	1	NA
Review Initial Performance Test report	1	1	NA
Review Annual Report	151	1	NA
Review Corrective Action Analysis	1	1	NA
Review Implementation Timeline	1	1	NA
Review Root Cause Analysis	1	1	NA
Review Wet Landfills Monitoring Report	62	1	NA
Total Responses for State/Local Agencies (rounded)			
Total Responses (rounded)			

Respondents, Responses, and Hours			
Respondent	Number of Respondents	Number of Responses	Reporting Hours
Private	1,170	585	80,739
Public	717	447	63,485
State & Local Agency	10	243	498
Total	-	1,275	144,722

(E)
Total Responses
 $E=B \times C + D$

2

0

13

8

8

9

0

2

0.2

365

1

1

1

175

585

2

0

12

21

21

17

0

2

0.2

287

1

1

1

82

447

0

6

13

6

0

1

0.1
1
151
1
1
1
62
243
1,275

Hours/respc 475

Recordkeeping Hours	Total Hours	Hours per Response	Hours Per Respondent
256,976	337,715	577	289
201,045	264,529	592	369
1,765	2,262	9	226
459,786	604,507	474.1	-

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
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
1	0	1,912	0	0
2	0	1,887	0	0
3	0	1,862	0	0
Average	0	1,887	0	0

^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 respondents based on data collected during the 2016 final rule. Due to the gap year between the expiration of the previous ICR, the 'Number of Existing Respondents' from the previous ICR has been adjusted to reflect the expected increase in responding sources controlling between years 2023 through 2025 based on projected emissions, as waste disposal quantities increase on landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requireme

(E)
Number of Respondents (E=A+B+C-D)
1,912
1,887
1,862
1,887

OLD COUNTS	
2022	1937
2023	1912
2024	1887

) estimated
previous ICR and Year 1
number of landfills
per time at active
nts.

Table 3: Universe of Existing Landfills Subject to 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	Emission Guidelines Only (Sources constructed or modified prior to July 2014)							Footnotes
	Number of Respondents			Sector				
	Year 2023	Year 2024	Year 2025	Private		Public		
				% Respondents	3-Year Average Number Respondents	% Respondents	3-Year Average Number Respondents	
1. Applications								
2. Surveys and Studies								
3. Reporting Requirements								
A. Read and Understand Rule Requirements	1912	1887	1862	62%	1,170	38%	717	a
B. Required Activities								
1. Initial performance test report	0	8	5	56%	2	44%	2	b
2. Surface methane monitoring quarterly	648	654	655	56%	365	44%	287	c
3. Wellhead monitoring monthly	648	654	655	56%	365	44%	287	d
C. Create Information								
D. Gather Information								
E. Report Preparation								
1. Initial design capacity report	0	0	0	27%	0	73%	0	e
2. Amended design capacity report	25	25	25	53%	13	47%	12	f
3. Report of NMOC rate (Tier 1)	30	28	27	27%	8	73%	21	g
4. Report of NMOC rate (Tier 2)	30	28	27	27%	8	73%	21	
5. Landfill Closure Report	22	33	23	35%	9	65%	17	h
6. Equipment Removal Report	0	0	0	35%	0	65%	0	i
7. Collection and Control System Design Plan	0	8	5	56%	2	44%	2	j
8. Revised C&C System design plan	0	0.8	0.5	56%	0.2	44%	0.2	k
9. Initial Performance Test	Included in 3B							
10. Compliance Report	Included in 3B							
11. Annual Report	648	654	655	56%	365	44%	287	l
12. Corrective Action Analysis	2	2	2	50%	1	50%	1	m
13. Implementation Timeline	2	2	2	50%	1	50%	1	m
14. Root Cause Analysis	2	2	2	50%	1	50%	1	m
15. Wet Landfill Monitoring Report	266	266	266		175		82	n
4. Recordkeeping Requirements								
A. Read Instructions	Included in 3A							
B. Plan Activities	NA							
C. Implement Activities	NA							
D. Develop Record System	NA							
E. Record Information								
1. Data Compilation and Review (controllers)	648	654	655	56%	365	44%	287	o
2. Recordkeeping and Data Storage (controllers)	648	654	655	56%	365	44%	287	o
3. Recordkeeping and Data Storage (others)	60	56	54	56%	32	44%	25	p
E. Personnel Training	NA							
F. Time for Audits	NA							

Assumptions:

- ^a EPA estimates that an average of 1,887 respondents per year are subject based on waste acceptance data found in the regulatory database developed for the 2016 rule.
- ^b This is a one time requirement. Only additional controllers from previous years are subject. Initial year burden was in 2022 which is outside of this ICR period since that is when the federal plan took effect.
- ^c Total number of controllers each year must conduct SEM. This is a recurring requirement. New greenfield sources coming online are not expected to trigger reporting.
- ^d Total number of controllers each year must conduct wellhead monitoring. This is a recurring requirement.
- ^e These are landfills that are smaller than 2.5 million Mg. This is a one-time requirement so 0 in all years of this ICR since the initial deadline passed in 2022 for the federal plan. Legacy controllers are exempt from this requirement.
- ^f Landfills filing an amended design capacity report (modified landfill) under the EG will become subject to subpart XXX.
- ^g This is the sum of reporters at open landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg. Of these, 50% are assumed to do Tier 1 and 50% assumed to do Tier 2. Closed landfills do not have to keep doing the annual NMOC report.
- ^h We assume that only landfills subject to the EG would close during the three-year period of this ICR.
- ⁱ EPA assumes that no sources remove equipment during the three-year period of this ICR.
- ^j This is an initial requirement once a landfill becomes subject to controls. The initial requirement was assumed to take place in 2022 prior to this ICR period.
- ^k EPA assumes that 10% of controllers will prepare revised GCCS
- ^l All landfills that control emissions must file an annual report.
- ^m It is unknown how many landfills will be required to conduct a root cause analysis, corrective action analysis, or implementation timeline. These items are not required by the rule for controlling landfills. A root cause analysis is only required if the landfill has an exceedance of the wellhead parameter is identified and cannot be corrected within 15 days. If the exceedance cannot be corrected within 60 days the owner or operator must also conduct a corrective action analysis and develop and implementation schedule. These items must only be submitted for approval if the corrective action will take longer than 120 days to correct. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated. For the purposes of estimating ICR burden, EPA estimates that one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- ⁿ Only landfills with leachate recirculation or RDD that have capacity >2.5 million Mg must file this report. This number is based on data from the 2016 Landfills NSPS/EG database.

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

Burden Item		3-Year Average Number of Respondents	State/Local Agency
			% Respondents ^a
1.	Familiarization with regulatory requirements (State/Local Agencies and EPA Regions) ^b		
2.	Enter and update information into agency recordkeeping system ^c	1887	23%
3.	Required activities		
	A. Observe initial performance test	4.3	23%
	B. Observe surface methane monitoring quarterly	652	23%
	C. Review operating parameters	4	23%
	D. Review continuous parameter monitoring	4.3	23%
	E. Review notification of performance test	4.3	23%
4.	Excess Emissions Enforcement Activities ^d	0	23%
5.	Reporting requirements		
	A. Review initial design capacity report	0	23%
	B. Review amended design capacity report	25	23%
	C. Review annual NMOC emission rate report	57	23%
	D. Review landfill closure report	26	23%
	E. Review equipment removal report	0	23%
	F. Review Collection and Control System Design Plan	4	23%
	G. Review Revised Collection and Control System Design Plan	0.4	23%
	H. Review Initial Performance Test Report	4.3	23%
	I. Review Annual Report	652	23%
	J. Review Corrective Action Analysis	2	23%
	K. Review Implementation Timeline	2	23%
	L. Review Root Cause Analysis	2	23%
	M. Wet Landfills Monitoring Report	266	23%
6.	Travel Expenses for Tests Attended (EPA attends 20% of tests and surface monitoring)	131	23%

Assumptions:

^a Approximately 23% of landfills subject to Subpart Cf are in a jurisdiction covered by a State or Local Agency. They are administered by one of ten U.S. EPA Regions implementing a state plan.

^b As of August 2022, EPA data indicates that 11 States and a small number of local agencies enforce the State plan or their plans effective by 2022. The number of EPA respondents per year is the number of EPA Regions (10 regional offices will familiarize themselves with the requirements of Subparts Cf and OOO each year, to account for staff turnover).

^c Every year, State and local agencies enter and update information for each of the 440 landfills that are subject to their jurisdiction. The remainder of the landfills (1,447) are under the jurisdiction of the 10 U.S. EPA Regions, who will enter and update information for each of the 440 landfills.

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

**Times for Municipal Solid Waste
CFR Part 62, Subpart OOO) (Renewal)**

Agency (State Plan)	EPA (Federal Plan)	
3-Year Average Number Respondents	% Respondents ^a	3-Year Average Number Respondents
11		10
440	77%	1,447
1	77%	3
151	77%	501
1	77%	3
1	77%	3
1	77%	3
0	77%	0
0	77%	0
6	77%	19
13	77%	44
6	77%	20
0	77%	0
1	77%	3
0.1	77%	0.3
1	77%	3
151	77%	501
1	77%	1
1	77%	1
1	77%	1
62	77%	204
30	77%	101

The remaining 77% of landfills subject to Subpart Cf

ans and two other state agencies are expected to have s). We assume one EPA employee at each Region transitions.

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