

ICR Summary Information

Hours per Response	651
Number of Respondents	298
Total Estimated Burden Hours	250,000
Total Estimated Costs	\$19,800,000
Annualized Capital O&M	\$1,180,000
Form Number	Not Applicable

Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart XXX) (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 *	Response
1. Applications	NA									
2. Surveys and Studies	NA									
3. Reporting Requirements										
A. Read and Understand Rule Requirements										
1. Existing Sources	4	1	4	144	0	576	29	58	\$65,023	c
2. New sources	40	1	40	1	0	40	2	4	\$4,557	c
B. Required Activities										
1. Initial performance test report	12	1	12	5	0	60	3	6	\$6,836	d
quarterly	44	4	176	173	30,448	0	0	0	\$1,960,425	e
3. Wellhead monitoring monthly	40	12	480	173	83,040	0	0	0	\$5,346,613	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	0	0	0	0	0	\$0	g
3. Report of NMOG rate (Tier 1)	8	1	8	10	0	80	4	8	\$9,114	h
4. Report of NMOG rate (Tier 2)	12	1	12	10	0	120	6	12	\$13,671	h
5. Landfill Closure Report	1	1	1	0	0	0	0	0	\$0	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	5	0	400	20	40	\$45,571	d,k
8. Revised C&C System design plan	20	1	20	0.5	0	10	1	1	\$1,167	l
9. Initial Performance Test	Included in 3B									
10. Compliance Report	Included in 3B									
11. Annual Report	27	1	27	173	0	4,671	234	467	\$532,158	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2	\$1,709	n
13. Implementation Timeline	15	1	15	1	0	15	1	2	\$1,709	n
14. Root Cause Analysis	15	1	15	1	0	15	1	2	\$1,709	n
15. Wet Landfill Monitoring Report	15	1	15	15	0	225	11	23	\$25,634	o
Subtotal for Reporting Requirements						120,649			\$8,016,496	
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 (controllers)	5	12	60	173	0	10,380	519	1,038	\$1,182,574	p
2. Recordkeeping and Data Storage (controllers)	11	12	132	173	0	22,836	1,142	2,284	\$2,601,663	p
3. Recordkeeping and Data Storage (others)	4	1	4	0	0	0	0	0	\$0	q
E. Personnel Training	NA									
F. Time for Audit	NA									
Subtotal for Recordkeeping Requirements						38,198			\$3,784,237	
Total Labor Burden and Costs (rounded)						159,000			\$11,800,000	r
Total Capital and O&M Costs (rounded)									\$732,000	r
Grand Total (rounded)									\$12,530,000	r

Labor		
Category	Rates	Occupation Code
Management	\$147,741.93/99	
Technical - Civil Engineer	\$102,144.97/2051	
Technical - Civil Engineering	\$64,397.93/2022	
Clerical	\$43.97/43-9061	
https://www.bls.gov/oes/current/oes_nat.htm		

Assumptions:

- We assume that an average of 271 respondents will be subject to this rule, and that 2 new sources and 25 modified sources will become subject to the rule each year over the three-year period of the ICR.
- This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2023, "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 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.
- We have assumed that each existing respondent will take 4 hours to read instructions as part of their reporting requirements. We estimate that, over the three-year period of this ICR, an average of 2 new respondents per year (1 privately-owned and 1 publicly-owned) will need to familiarize with the requirements of the rule. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- We estimate that, over the three-year period of this ICR, an average of 8 respondents per year (5 privately-owned and 3 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. Based on the regulatory database, 64% of these respondents are private and 36% are public.
- 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 hrs/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 GCSS is well-operated and the surface is well sealed.
- The initial design capacity report applies to new landfills with a design capacity smaller than 2.5 million Mg. We assume that all new landfills will have a design capacity exceeding 2.5 million Mg. Therefore, this one-time requirement will not apply to new landfills. We assume that the existing NSPS landfills with design capacity less than 2.7 million Mg have submitted this report, and are therefore exempt from this requirement.
- We assume that no landfills currently subject to Subpart XXX will submit an amended design capacity report during the three-year period of this ICR.
- We estimate that, over the three-year period of this ICR, an average of 29 respondents per year (10 privately-owned and 19 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 NMOG reports. Of the landfills estimated to remain uncontrolled in the regulatory database 64% are public and 36% are private.
- We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- Equipment Removal Report requires inclusion of 3 successive NMOG rates using Tier 2 calculations to demonstrate landfill is below the NMOG threshold.
- Prior to installing a collection and control system, a landfill is required to submit a Collection and Control System Design Plan for approval. This requirement applies only to landfills controlling under the revised 34 Mg/yr requirement. This requirement does not apply to landfills that use "legacy" controllers (i.e. those landfills already subject to controls under the original 50 Mg/yr requirement).
- We have assumed that 10% of landfills installing a collection and control system will revise their design plan. We estimate that, over the three-year period of this ICR, an average of 8 respondents per year (5 privately-owned and 3 publicly-owned) will submit a Collection and Control System Design Plan. This results in submittal of 0.8 C&C System Design Plan revisions per year (8 x 0.1 = 0.8 revisions/year).
- All controlled landfills are required to submit an annual report. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- 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.
- The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- The respondents subject to this recordkeeping requirement (0) have a reporting requirement but are not required to control.

Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart XXX) (Renewal)

Burden Item	(A) Person Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Technical Hours per Respondent 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) Management 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. Read and Understand Rule Requirements										
1. Existing Sources	4	1	4	127	0	508	25	51	\$57,876	c
2. New sources	40	1	40	1	0	40	2	4	\$4,557	c
B. Required Activities										
1. Initial performance test report	12	1	12	3		36	2	4	\$4,101	d
2. Surface methane monitoring quarterly	44	4	176	98	17,248	0	0	0	\$1,110,530	e
3. Wellhead monitoring monthly	40	12	480	98	47,040	0	0	0	\$3,028,717	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	0	0	0	0	0	\$0	g
3. Report of NMOC rate (Tier 1)	8	1	8	19	0	152	8	15	\$17,317	h
4. Report of NMOC rate (Tier 2)	12	1	12	19	0	228	11	23	\$25,976	h
5. Landfill Closure Report	1	1	1	0	0	0	0	0	\$0	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	3	0	240	12	24	\$27,343	d, k
8. Revised C&C System design plan	20	1	20	0.3	0	6	0	1	\$656	l
9. Initial Performance Test	Included in 3B									
10. Compliance Report	Included in 3B									
11. Annual Report	27	1	27	98	0	2,646	132	265	\$301,454	m
12. Corrective Action Analysis	15	1	15	1	0	15	1	2	\$1,709	n
13. Implementation Timeline	15	1	15	1	0	15	1	2	\$1,709	n
14. Root Cause Analysis	15	1	15	1	0	15	1	2	\$1,709	n
15. Wet Landfill Monitoring Report	15	1	15	17	0	255	13	26	\$29,052	o
Subtotal for Reporting Requirements						69,067			\$4,612,705	
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										
(controllers)	5	12	60	98	0	5,880	294	588	\$669,898	p
(controllers)	11	12	132	98	0	12,936	647	1,294	\$1,473,775	p
3. Recordkeeping and Data Storage (others)	4	1	4	0	0	0	0	0	\$0	q
F. Personnel Training	NA									
G. Time for Audits	NA									
Subtotal for Recordkeeping Requirements						21,638			\$2,143,672	
Total Labor Burden and Costs (rounded)						90,705			\$6,760,000	r
Total Capital and O&M Cost (rounded)									\$451,000	r
Grand Total (rounded)									\$7,210,000	r

Labor		
Category	Rates	Occupation Code
Management	\$147.74	11-9199
Technical - Civil Engineer	\$102.14	17-2051
Technical - Civil Engineering Technician	\$64.39	17-3022
Clerical	\$43.97	43-9061
https://www.bls.gov/oes/current/oes_nat.htm		

Totals for 1A + 1B	
250,000	Hours
\$18,600,000	\$ Labor
\$1,180,000	\$ Capital/O&M
\$19,800,000	\$ Grand

Assumptions:

Table 1C: Universe of Existing, Modified and Greenfield Landfills Subject to NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart XXX) (Renewal)

Burden Item	NSPS only (new/modified after July 2014)							Footnotes
	Number of Respondents			Sector				
	Year 2025	Year 2026	Year 2027	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								
1. Existing Sources	244	271	298	53%	144	47%	127	a
2. New sources	2	2	2	53%	1	47%	1	a
B. Required Activities								
1. Initial performance test report	20	0	4	64%	5	36%	3	b
2. Surface methane monitoring quarterly	244	271	298	64%	173	36%	98	c
3. Wellhead monitoring monthly	244	271	298	64%	173	36%	98	d
C. Create Information								
D. Gather Information								
E. Report Preparation								
1. Initial design capacity report	0	0	0	36%	0	64%	0	e
2. Amended design capacity report	0	0	0		0		0	f
3. Report of NMOC rate (Tier 1)	29	30	28	36%	10	64%	19	g
4. Report of NMOC rate (Tier 2)	29	30	28	36%	10	64%	19	
5. Landfill Closure Report	0	0	0					h
6. Equipment Removal Report	0	0	0					i
7. Collection and Control System Design Plan	20	0	4	64%	5	36%	3	j
8. Revised C&C System design plan	2.0	0.0	0.4	64%	0.5	36%	0.3	k
9. Initial Performance Test	Included in 3B							
10. Compliance Report	Included in 3B							
11. Annual Report	244	271	298	64%	173	36%	98	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	32	32	32	47%	15	53%	17	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								
(controllers)	244	271	298	64%	173	36%	98	o
2. Recordkeeping and Data Storage (controllers)	244	271	298	64%	173	36%	98	o
3. Recordkeeping and Data Storage (others)	0	0	0	36%	0	64%	0	p
E. Personnel Training	NA							
F. Time for Audits	NA							

Assumptions:

- ^a This ICR assumes all existing sources need to re-familiarize with the rule each year, at 4 hours per source, and new sources need to read and understand the rule, at 40 hours for each new greenfield source.
- ^b One time requirement. The initial year burden reflects that most state plans or federal plans have not yet taken effect. Requirement applies only to landfills that are not "legacy" controllers, i.e. those controlling under the revised more stringent 34 Mg/yr requirement not those already subject to controls under the original 50 Mg/yr requirement.
- ^c Total number of controllers each year must conduct SEM, recurring requirement. New greenfield sources would not be expected to trigger these requirements.
- ^d Total number of controllers each year must conduct wellhead, recurring requirement.
- ^e These are landfills that are smaller than 2.5 million Mg. This ICR assumes new landfills will be large in size so 0 respondents; also a one-time requirement. This ICR assume most of the NSPS sites would be legacy controllers during this reporting period. Legacy controllers are exempt from this requirement.
- ^f Landfills filing an amended design capacity report under the EG will become subject to XXX.
- ^g Includes reporters at open landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg. Of these, 50% assumed to do Tier 1 and 50% assumed to do Tier 2 calculations. Closed landfills do not have to continue submitting the annual NMOC report.
- ^h Only applies to EG sources. No NSPS sources would close in this period.
- ⁱ Assume 0 equipment removed during the ICR period.
- ^j The initial year burden reflects that most state plans or federal plans have not yet taken effect. Requirement applies only to landfills that are not "legacy" controllers, i.e. those controlling under the revised more stringent 34 Mg/yr requirement not those already subject to controls under the original 50 Mg/yr requirement.
- ^k 10% of controllers will prepare revised GCCS.
- ^l Includes all controlling landfills.
- ^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, 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 recirc or RDD that have capacity >2.5 million Mg must file this report.

Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart XXX) (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) Plants per year ^a	(E) Technical hours per year (Cx D)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Costs, \$ ^b	Footnotes
1. Read and understand rule requirements (10 EPA Regions)	4	1	4	10	40	2	4	\$2,560	c
2. Enter and update information into agency recordkeeping system	2	1	2	271	542	27	54	\$34,691	d
3. Required activities								\$0	
A. Observe initial performance test	12	0.2	2	8	19	1	2	\$1,229	e
B. Observe surface methane monitoring quarterly	20	0.2	4	271	1,084	54	108	\$69,382	e
C. Review operating parameters	1	1	1	8	8	0	1	\$512	f
D. Review continuous parameter monitoring	1	1	1	8	8	0	1	\$512	f
E. Review notification of performance test	2	1	2	8	16	1	2	\$1,024	f
4 Excess Emissions Enforcement Activities	24	0.1	2	8	19	1	2	\$1,229	g
5. Reporting requirements								\$0	
A. Review initial design capacity report	1	1	1	0	0	0	0	\$0	h
B. Review amended design capacity report	2	0	0	0	0	0	0	\$0	i
C. Review annual NMOC emission rate report	2	1	2	58	116	6	12	\$7,425	j
D. Review landfill closure report	1	1	1	0	0	0	0	\$0	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	8	120	6	12	\$7,681	e, l
G. Review Revised Collection and Control System Design Plan	5	0.1	1	1	0	0	0	\$26	m
H. Review Initial Performance Test Report	12	1	12	8	96	5	10	\$6,145	e
I. Review Annual Report	2	1	2	271	542	27	54	\$34,691	n
J. Review Corrective Action Analysis	3.75	1	4	2	8	0	1	\$480	o
K. Review Implementation Timeline	3.75	1	4	2	8	0	1	\$480	o
L. Review Root Cause Analysis	3.75	1	4	2	8	0	1	\$480	o
M. Wet Landfills Monitoring Report	2	1	2	32	64	3	6	\$4,096	p
7. Travel Expenses for Tests Attended	3 days * (\$164 hotel + \$81 meals/incidentals) + (\$600 round trip) = \$1335 per trip			56				\$74,493	q
TOTAL (Rounded)						3,100		\$247,000	r

Assumptions:

- ^a We assume that an average of 271 respondents will be subject to this rule, and that 2 new sources and 25 modified sources will become subject to the rule each year over the three-year period of the ICR.
- ^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 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), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- ^c The number of plants per year is the number of EPA Regions (10 regions). We assume one EPA employee at each Region offices familiarizes with the rule each year.
- ^d The number of plants per year is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.
- ^e 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 (8 per year) and surface methane monitoring (271 per year) occur.
- ^f The number of plants 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 plants per year is based on the assumption that of the landfills that do the initial performance test, 10% of them will have exceedances and need enforcement.
- ^h The initial design capacity report applies to new landfills with a design capacity smaller than 2.5 million Mg. We assume that all new landfills will have a design capacity exceeding 2.5 million Mg. Therefore, this one-time requirement will not apply to new landfills. We assume that the existing NSPS landfills with design capacity less than 2.5 million Mg have submitted this report, and are therefore exempt from this requirement.
- ⁱ We assume that no landfills currently subject to Subpart XXX will have modifications requiring the submittal of an amended design capacity report during the three-year period of this ICR.
- ^j The number of plants is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports. We estimate that, over the three-year period of this ICR, an average of 58 respondents per year will submit Tier 1 or Tier 2 reports.
- ^k We assume that no controlled landfill will close or remove equipment during the three-year period of this ICR.
- ^l We estimate that an average of 8 landfills per year 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 controlling under the revised 34 Mg/yr requirement. This requirement does not apply to landfills that are "legacy" controllers (i.e. those landfills already subject to controls under the original 50 Mg/yr requirement).
- ^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 271 respondents per year operating controlled landfills will need to submit this report.
- ^o Number of plants is based on the assumption that one public and one private 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, 15 privately-owned landfills and 17 publicly-owned landfills will be required to file this report each year.

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	8	\$8,842	\$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	8	\$2,635	\$1,000
Thermocouple ^{e, f}	\$500	\$55	8	\$439	
Data Recorder ^{e, f}	\$4,500	\$494	8	\$3,953	
Totals (Rounded)				\$94,400	
Grand Total (Rounded)					

^a This requirement applies only to new landfills requiring controls and existing landfills that are not "legacy" controls under the revised more stringent 34 Mg/yr requirement and not those already subject to controls under the original. Annualized cost is figured for method 25 or 25C test at 7% over 15 years, which is the expected lifetime of the flare.

^b Tier 2 testing is done by operating landfills that do not meet control thresholds but meet the size thresholds of 2.5 landfills, 50% assumed to do Tier 1 testing and 50% assumed to do Tier 2 testing. Since a Tier 2 test must be repeated, 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 costs at \$600/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases at \$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 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.

(G)	(H)
Number of Respondents with O&M	Total O&M (F x G)
0	\$0
0	\$0
271	\$762,594
271	\$55,284
271	\$271,000
	\$1,090,000
	\$1,180,000

ollers, i.e. those controlling
50 Mg/yr requirement.
e or other destruction device.

million Mg. Of these 58
itted every 5 years, annualized

ne weekly equipment rental
nd hydrogen fuel (at a cost of

est. All sources operating

000.

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	27	244	0	0
2	27	271	0	0
3	27	298	0	0
Average	27	271	0	0

^a Based on the data sources used to support the 2016 NSPS rulemaking, there were 14 new landfill over an 8-year per year) and 123 modified landfills over a 5-year period (25 modified landfills per year).

^b The 'Number of Existing Respondents' in year 3 (217) of the previous ICR (2498.04) has been incremented by 2 sources (217 + 27 = 244) to reflect the number of existing respondents in Year 1 of this ICR.

(E)
Number of Respondents (E=A+B+C-D)
271
298
325
298

period (2 new landfills

7 modified and new

Total Annual Number of		
(A) Information Collection Activity	(B1) Number of Privately-owned Respondents	(B2) Number of Publicly-owned Respondents
Initial performance test report	5	3
Initial design capacity report	0	0
Amended design capacity report	0	0
Report of NMOC rate (Tier 1)	10	19
Report of NMOC rate (Tier 2)	10	19
Landfill Closure Report	0	0
Equipment Removal Report	0	0
Collection and Control System Design Plan	5	3
Revised C&C System design plan	0.5	0.3
Annual Report	173	98
Corrective Action Analysis	1	1
Implementation Timeline	1	1
Root Cause Analysis	1	1
Wet Landfill Monitoring Report	15	17
Total Annual Number of Responses		

Responses

(C) Number of Responses per Respondent	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Responses $E=(B1+B2)xC+D$
1	NA	8
1	NA	0
1	NA	0
1	NA	29
1	NA	29
1	NA	0
1	NA	0
1	NA	8
1	NA	0.8
1	NA	271
1	NA	2
1	NA	2
1	NA	2
1	NA	32
		384

Hours/response

651

Table 1.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance

for Publicly-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 1

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^d	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) x Cx F)	(M) Total Number of Responses per Year (C X F) ^e	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	59	0	2,360	236	118	\$224,098	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	30	0	360	36	18	\$34,184	\$89,509.78	30	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	30	5,280	0	0	0	\$263,229	\$84,420	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	30	14,400	0	0	0	\$717,898	\$6,120	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	8	0	16	2	1	\$1,519	\$0	8		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOG rate (Tier 1)	8	\$0		1	0	8	11	0	84	8	4	\$7,976	\$0	11		j
4. Report of NMOG rate (Tier 2)	12	\$2,708		1	0	12	11	0	126	13	6	\$11,965	\$28,437	11	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l,m
7. Collection and Control System Design Plan	80	\$0		1	0	80	30	0	2,400	240	120	\$227,896	\$0	30		f
8. Revised design plan	20	\$0		1	0	20	3	0	60	6	3	\$5,697	\$0	3		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	30	0	810	81	41	\$76,915	\$0	30		o
12. Corrective Action Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	15	\$0		1	0	15	17	1	255	26	13	\$24,264	\$0	17		s
Reporting Subtotal								19,681	6,516	652	326	\$1,599,915	\$208,487	142	\$28,134	
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	\$0		12	0	60	30	0	1,800	180	90	\$170,922	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	30	0	3,960	396	198	\$376,029	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	29	0	116	12	6	\$11,015	\$0	0		q
E. Personnel Training	na															
F. Time for Audits	na															
Recordkeeping Subtotal								0	5,876	588	294	\$557,966	\$0	0	\$0	
Totals								19,681	12,392	1,239	620	\$2,157,881	\$208,487	142	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements. Based on the regulatory database, 53% of these respondents are private and 47% are public.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment for the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 84 controlled landfill during the first year of this ICR period. 36% of which are public and 64% of which are private. This is a one-time requirement.
- g Assumes 84 controlled landfill during the first year of this ICR period. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed 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 to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month for the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h Based on the regulatory database, there are 9 greenfields and modified landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement. Based on the regulatory database, 11% of these respondents are private and 89% are public.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOG reports. Of the landfills estimated to remain uncontrolled in the regulatory database 64% are public and 36% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOG rates using Tier 2 calculations to demonstrate landfill is below the NMOG threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 84 controlled landfill during the first year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p Assumes 84 controlled landfill during the first year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 31% of these respondents are private and 69% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- r 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, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- s The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 years.

Table 2.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Publically-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 2

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^a	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) x C x F)	(M) Total Number of Responses per Year (C X F)	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	3	0	120	12	6	\$11,395	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	3	0	36	4	2	\$3,418	\$98,460.76	3	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	33	5,808	0	0	0	\$289,552	\$92,862	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	33	15,840	0	0	0	\$789,687	\$6,732	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	11	0	84	8	4	\$7,976	\$0	11		j
4. Report of NMOC rate (Tier 2)	12	\$2,708		1	0	12	0	0	0	0	0	\$0	\$28,437	0	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l, m
7. Collection and Control System Design Plan	80	\$0		1	0	80	3	0	240	24	12	\$22,790	\$0	3		f
8. Revised design plan	20	\$0		1	0	20	0	0	6	1	0	\$570	\$0	0		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	33	0	891	89	45	\$94,606	\$0	33		o
12. Corrective Action Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	5	\$0		1	0	5	17	0	85	9	4	\$8,071	\$0	17		s
Reporting Subtotal								21,648	1,507	151	75	\$1,222,339	\$226,492	70	\$28,134	
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	\$0		12	0	60	33	0	1,980	198	99	\$188,014	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	33	0	4,356	436	218	\$413,632	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	29	0	116	12	6	\$11,015	\$0	0		q
F. Personnel Training	na															
G. Time for Audits	na							0	6,452	645	323	\$612,661	\$0	0	\$0	
Recordkeeping Subtotal								21,648	7,959	796	398	\$1,835,000	\$226,492	70	\$28,134	
Totals								21,648	7,959	796	398	\$1,835,000	\$226,492	70	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements. Based on the regulatory database, 70% of these respondents are private and 30% are public.
- e
- f Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 157.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 7 additional controlled landfills during the second year of this ICR period. 36% of which are public and 64% of which are private. This is a one-time requirement.
- g
- h A total of 91 controlled sites in year 2. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCOS is well-operated and the surface is well sealed.
- h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 58% are public and 42% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 91 controlled landfill during the second year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p
- q Assumes 91 controlled landfill during the second year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- r Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 36% of these respondents are private and 64% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- s 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 GCOS is well-operated. For the purposes of estimating ICR burden, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- t The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 year

Table 3.A. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Publicly-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 3

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^e	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) x C x F)	(M) Total Number of Responses per Year (C X F) ^f	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	7	0	84	8	4	\$7,976	\$119,346.38	7	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	40	7,040	0	0	0	\$350,972	\$112,560	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	40	19,200	0	0	0	\$957,197	\$8,160	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOOC rate (Tier 1)	8	\$0		1	0	8	7	0	56	6	3	\$5,318	\$0	7		j
4. Report of NMOOC rate (Tier 2)	12	\$2,708		1	0	12	0	0	0	0	0	\$0	\$28,437	0	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l,m
7. Collection and Control System Design Plan	80	\$0		1	0	80	7	0	560	56	28	\$53,176	\$0	7		f
8. Revised design plan	20	\$0		1	0	20	1	0	14	1	1	\$1,329	\$0	1		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	40	0	1,080	108	54	\$102,553	\$0	40		o
12. Corrective Action Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	5			1	0	5	17	0	85	9	4	\$8,071	\$0	17		s
Reporting Subtotal								26,240	1,924	192	96	\$1,490,866	\$268,503	82	\$28,134	
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	\$0		12	0	60	40	0	2,400	240	120	\$227,896	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	40	0	5,280	528	264	\$501,372	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	22	0	88	9	4	\$8,356	\$0	0		q
E. Personnel Training	na															
F. Time for Audits	na															
Recordkeeping Subtotal								0	7,768	777	388	\$737,624	\$0	0	\$0	
Totals								26,240	9,692	969	485	\$2,228,490	\$268,503	82	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 13 additional controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. This is a one-time requirement.
- g A total of 104 controlled sites in year 3. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 38% of which are public and 62% of which are private. 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. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require remonitoring 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.
- h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 61% are public and 39% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOOC rates using Tier 2 calculations to demonstrate landfill is below the NMOOC threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 104 controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p Assumes 104 controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 31% of these respondents are private and 69% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- r 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, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- s The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 year

Table 1.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Privately-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 1

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non- Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^a	(L) Total Annualized Non- Labor Capital and O&M Costs Per Year ((B1+B2) x Cx F)	(M) Total Number of Responses per Year (C X F)	(N) Capital/Start- up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	67	0	2,680	268	134	\$254,484	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	54	0	648	65	32	\$61,532	\$161,117.61	54	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	54	9,504	0	0	0	\$473,812	\$151,956	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	54	25,920	0	0	0	\$1,292,216	\$11,016	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	1	0	2	0	0	\$190	\$0	1		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	6	0	48	5	2	\$4,558	\$0	6		j
4. Report of NMOC rate (Tier 2)	12	\$2,708		1	0	12	6	0	72	7	4	\$6,837	\$16,250	6	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l, m
7. Collection and Control System Design Plan	80	\$0		1	0	80	54	0	4,320	432	216	\$410,213	\$0	54		f
8. Revised design plan	20	\$0		1	0	20	5	0	108	11	5	\$10,255	\$0	5		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	54	0	1,458	146	73	\$138,447	\$0	54		o
12. Corrective Action Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15	\$0		1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	15	\$0		1	0	15	15	0	225	23	11	\$21,365	\$0	15		s
Reporting Subtotal								35,424	9,606	961	480	\$2,678,183	\$340,339	198	\$28,134	
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	\$0		12	0	60	54	0	3,240	324	162	\$307,660	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	54	0	7,128	713	356	\$676,852	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	13	0	52	5	3	\$4,938	\$0	0		q
F. Personnel Training	na															
G. Time for Audits	na															
Recordkeeping Subtotal								0	10,420	1,042	521	\$989,449	\$0	0	\$0	
Totals								35,424	20,026	2,003	1,001	\$3,667,632	\$340,339	198	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements. Based on the regulatory database, 53% of these respondents are private and 47% are public.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 84 controlled landfill during the first year of this ICR period. 36% of which are public and 64% of which are private. This is a one-time requirement.
- g Assumes 84 controlled landfill during the first year of this ICR period. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed 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 to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h Based on the regulatory database, there are 9 greenfields and modified landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement. Based on the regulatory database, 11% of these respondents are private and 89% are public.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 64% are public and 36% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 84 controlled landfill during the first year of this ICR period, 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p Assumes 84 controlled landfill during the first year of this ICR period, 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 31% of these respondents are private and 69% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- r 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, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- s The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 years.

Table 2.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Privately-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 2

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) x Cx F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	7	0	280	28	14	\$26,588	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	4	0	48	5	2	\$4,558	\$173,052.25	4	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	58	10,208	0	0	0	\$508,910	\$163,212	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	58	27,840	0	0	0	\$1,387,935	\$11,832	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	8	0	60	6	3	\$5,697	\$0	8		j
4. Report of NMOC rate (Tier 2)	12	\$2,708		1	0	12	2	0	18	2	1	\$1,709	\$20,312	2	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l,m
7. Collection and Control System Design Plan	80	\$0		1	0	80	4	0	320	32	16	\$30,386	\$0	4		f
8. Revised design plan	20	\$0		1	0	20	0	0	8	1	0	\$760	\$0	0		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	58	0	1,566	157	78	\$148,702	\$0	58		o
12. Corrective Action Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	5			1	0	5	15		75	8	4	\$7,122	\$0	15		s
Reporting Subtotal								38,048	2,420	242	121	\$2,126,640	\$368,408	93	\$28,134	
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	\$0		12	0	60	58	0	3,480	348	174	\$330,449	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	58	0	7,656	766	383	\$726,989	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	16	0	64	6	3	\$6,077	\$0	0		q
E. Personnel Training	na															
F. Time for Audits	na															
Recordkeeping Subtotal								0	11,200	1,120	560	\$1,063,516	\$0	0	\$0	
Totals								38,048	13,620	1,362	681	\$3,190,156	\$368,408	93	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements. Based on the regulatory database, 70% of these respondents are private and 30% are public.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 7 additional controlled landfills during the second year of this ICR period. 36% of which are public and 64% of which are private. This is a one-time requirement.
- g A total of 91 controlled sites in year 2. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 36% of which are public and 64% of which are private. For wellhead monitoring: The estimated burden was based on industry consultation of \$2000 per month during the most recent ICR renewal for subpart WWW (ICR# 1557.09), or approximately 40 hours of technician labor time. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 58% are public and 42% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 91 controlled landfill during the second year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p Assumes 91 controlled landfill during the second year of this ICR period. 36% of which are public and 64% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 36% of these respondents are private and 64% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- r 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, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- s The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 years.

Table 3.B. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Standards of Performance for Privately-Owned Municipal Solid Waste Landfills - Subpart XXX - Year 3

Burden Item	(A) Respondent Hours per Occurrence ^a	(B1) Annualized Non-Labor Capital Costs Per Occurrence	(B2) Annual Non-Labor O&M Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Civil Engineer Technician Hours per Respondent Per Year (A X C)	(E) Technical Hours per Respondent Per Year (A X C)	(F) Number of Respondents Per Year	(G) Civil Engineer Technician per Year @ \$49.85	(H) Technical Hours per Year @ \$86.46 (E X F)	(I) Clerical Hours per Year @ \$30.28 (H X 0.1)	(J) Management Hours per Year @ \$109.43 (H X .05)	(K) Total Labor Costs Per Year ^b	(L) Total Annualized Non-Labor Capital and O&M Costs Per Year ((B1+B2) X C X F)	(M) Total Number of Responses per Year (C X F) ^c	(N) Capital/Start-up Costs per occurrence	Footnotes
1. Applications	na															
2. Surveys and Studies	na															
3. Reporting Requirements																
A. Read and Understand Rule Requirements	40	\$0		1	0	40	0	0	0	0	0	\$0	\$0	0		d
B. Required Activities																
1. Initial performance test report	12	\$1,984	\$1,000	1	0	12	6	0	72	7	4	\$6,837	\$190,954	6	18,067	e, f
2. Surface methane monitoring quarterly	44	\$704		4	176	0	64	11,264	0	0	0	\$561,555	\$180,096	0		a, g
3. Wellhead monitoring monthly	40	\$17		12	480	0	64	30,720	0	0	0	\$1,531,515	\$13,056	1		a, g
C. Create Information	Included in 3B															
D. Gather Information	Included in 3B															
E. Report Preparation																
1. Initial design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		h
2. Amended design capacity report	2	\$0		1	0	2	0	0	0	0	0	\$0	\$0	0		i
3. Report of NMOC rate (Tier 1)	8	\$0		1	0	8	5	0	36	4	2	\$3,418	\$0	5		j
4. Report of NMOC rate (Tier 2)	12	\$2,708		1	0	12	0	0	0	0	0	\$0	\$20,312	0	10,067	j, k
5. Landfill Closure Report	1	\$0		1	0	1	0	0	0	0	0	\$0	\$0	0		l
6. Equipment Removal Report	36	\$0		1	0	36	0	0	0	0	0	\$0	\$0	0		l, m
7. Collection and Control System Design Plan	80	\$0		1	0	80	6	0	480	48	24	\$45,579	\$0	6		f
8. Revised design plan	20	\$0		1	0	20	1	0	12	1	1	\$1,139	\$0	1		n
9. Initial Performance Test	Included in 3B															
10. Compliance Report	Included in 3B															
11. Annual Report	27	\$0		1	0	27	64	0	1,728	173	86	\$164,085	\$0	64		o
12. Corrective Action Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
13. Implementation Timeline	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
14. Root Cause Analysis	15			1	0	15	1	0	15	2	1	\$1,424	\$0	1		r
15. Wet Landfill Monitoring Report	5			1	0	5	15	0	75	8	4	\$7,122	\$0	15		s
Reporting Subtotal								41,984	2,448	245	122	\$2,325,524	\$404,418	99	\$28,134	
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	\$0		12	0	60	64	0	3,840	384	192	\$364,634	\$0	0		p
2. Recordkeeping and Data Storage (controllers)	11	\$0		12	0	132	64	0	8,448	845	422	\$802,195	\$0	0		p
3. Recordkeeping and Data Storage (others)	4	\$0		1	0	4	10	0	40	4	2	\$3,798	\$0	0		q
E. Personnel Training	na															
F. Time for Audits	na															
Recordkeeping Subtotal								0	12,328	1,233	616	\$1,170,627	\$0	0	\$0	
Totals								41,984	14,776	1,478	739	\$3,496,151	\$404,418	99	\$28,134	

FOOTNOTES

- a We have assumed all respondent hours equals the number of Technical Hours except for surface methane monitoring and wellhead monitoring which fall under Civil Engineer Technician Hours.
- b This ICR uses mean hourly wage for the following labor categories from the United States Department of Labor, Bureau of Labor Statistics, May 2013, "National Occupational Employment and Wage Estimates United States": Managers, All Other for Managerial labor, Civil Engineer for Technical labor, 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 Includes only responses that are submitted as reports.
- d This is a one time requirement for new respondents. We have assumed that each new respondent will take 40 hours to read instructions as part of their reporting requirements.
- e Based on the annualized capital costs for method 25 or 25C over 15 years, which is the expected lifetime of the flare or other destruction device. Other capital costs related to flare station monitoring include a thermocouple, flowmeter and data recorder. The costs for these equipment purchases were provided based on industry comment on the ICR renewal 1557.09 burden. These capital/start-up costs were also annualized over 15 years, since this is a one-time requirement. In addition, the industry comments also reported an annual O&M cost for these equipment in the most recent ICR renewal, and these costs were incorporated here.
- f Assumes 13 additional controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. This is a one-time requirement.
- g A total of 104 controlled sites in year 3. For surface monitoring: The average acreage of controlled sites is estimated to be 174 acres (44 labor hours @ 0.25 hours per acre) under the final 2.5/34 option. We assumed weekly equipment rental costs at \$350/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel to operate the surface monitoring equipment. 38% of which are public and 62% of which are private. 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. The burden provided did not breakdown labor vs. non-labor costs, therefore we have not incorporated equipment rental costs in this estimate. We did however include costs for calibration gases for the wellhead equipment. Cost of re-monitoring for exceedances of surface monitoring or wellhead monitoring are not included because the rule does not require re-monitoring unless an exceedance is found. Landfills can minimize the number of exceedances found by ensuring the GCCS is well-operated and the surface is well sealed.
- h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume.
- i Assumes no landfills will submit an amended design capacity report.
- j We have assumed that 50 percent of uncontrolled landfills with use Tier 1 calculations annually and 50 percent will use Tier 2 calculations once every 5 years for their NMOC reports. Of the landfills estimated to remain uncontrolled in the regulatory database 61% are public and 39% are private.
- k Based on the annualized capital costs for conducting a method 25, method 25A or 25C over 5 years, since a Tier 2 test must be repeated every 5 years. Labor burden is assigned once every 5 years.
- l We have assumed that no controlled landfill will close or remove equipment during this ICR period. None of the greenfields or modified sources are predicted to close during this ICR period.
- m Equipment Removal Report requires inclusion of 3 successive NMOC rates using Tier 2 calculations to demonstrate landfill is below the NMOC threshold.
- n We have assumed that 10% of controlled landfill will revise their design plan.
- o Assumes 104 controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. The estimated burden was based on industry consultation of \$5000 per year for compliance reporting (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). Since this estimate included an assumption of a semi-annual report to satisfy the requirements of the landfills NESHAP, we adjusted this estimate by half to account for the single report required by this NSPS, or \$2500, which is approximately 27 technical hours per occurrence.
- p Assumes 104 controlled landfill during the third year of this ICR period. 38% of which are public and 62% of which are private. The estimated burden was based on industry consultation of \$1000 per month for recordkeeping and data storage per month and \$500 for data compilation and review per month (see comment on recent ICR renewal for subpart WWW, ICR# 1557.09). This is approximately 5 technical hours per occurrence for data compilation and review and 11 hours for recordkeeping and data storage.
- q Number of occurrences is based on the total number of landfills that are subject to the standard but not controlling. Based on the regulatory database, 31% of these respondents are private and 69% are public. These records are much more simplistic for these sources than landfills controlling emissions.
- r 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, one of the landfills subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.
- s The initial wet landfill report will take some additional time to prepare as it will contain historical records, when available. Subsequent year reports will only require reporting of the data for the reporting year. The report is required for all landfills affected by this rule based on size if they have added liquids or recirculated leachate in the last 10 years.

**Table 1.C. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 1**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes
1. Read and understand rule requirements	40	10	400	400	20	40	\$21,360	a
2. Enter and update information into agency recordkeeping system	2	84	168	168	8	17	\$8,971	b
3. Required activities								
A. Observe initial performance test	12	17	202	202	10	20	\$10,765	c, d
B. Observe surface methane monitoring quarterly	20	17	336	336	17	34	\$34,978	c
C. Review operating parameters	1	84	84	84	4	8	\$4,486	d
D. Review continuous parameter monitoring	1	84	84	84	4	8	\$4,486	e
E. Review notification of performance test	2	84	168	168	8	17	\$8,971	d
4 Excess Emissions Enforcement Activities	24	8	202	202	10	20	\$10,765	f
5 Notification requirements								
A. Review amended design capacity report	2	0	0	0	0	0	\$0	g
6. Reporting requirements								
A. Review initial design capacity report	1	9	9	9	0	1	\$481	h
B. Review annual NMOC emission rate report	2	33	66	66	3	7	\$3,524	i
C. Review landfill closure report	1	0	0	0	0	0	\$0	j
D. Review equipment removal report	1	0	0	0	0	0	\$0	j
E. Review Collection and Control System Design Plan	15	84	1,260	1,260	63	126	\$67,284	d
F. Review Revised Collection and Control System Design Plan	5	8	42	42	2	4	\$2,243	k
G. Review Initial Performance Test	12	84	1,008	1,008	50	101	\$53,827	d
H. Review Annual Report	2	84	168	168	8	17	\$8,971	
I. Review Corrective Action Analysis	3.75	2	8	8	0	1	\$401	n
J. Review Implementation Timeline	3.75	2	8	8	0	1	\$401	n
K. Review Root Cause Analysis	3.75	2	8	8	0	1	\$401	n
L. Wet Landfills Monitoring Report	2	32	64	64	3	6	\$3,418	o
7. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip						\$37,901	m
TOTAL BURDEN AND COST (SALARY)				4,283	214	428	\$283,632	
TOTAL ANNUAL HOURS						4,925		

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$1,014 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2017. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2017.

f Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

g Assumes no landfills during this ICR period will have modifications.

h Based on the regulatory database, there are 9 greenfields and modified landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This is a one-time requirement. Assumes no landfills will submit an amended design capacity report.

i Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

j We have assumed that no controlled landfill will close or remove equipment during this ICR period.

k Assumes 10 percent of respondents submitting a 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).

l Assumes the following labor rates: \$64.16 per hour for Management labor; \$47.62 per hour for Technical labor, and \$25.76 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2016 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule/>

m Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

n Number of occurrences is based on the assumption that one public and one private landfill subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.

o While this data is being collected to inform future standards, it is assumed the agency will briefly review each report submitted by the landfills during the reporting year. Since the initial year reports include historical data, when available, the review of the report in the initial year will take additional time than subsequent year reports.

**Table 2.C. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 2**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ ^k	Footnotes	
1. Read and understand rule requirements	40	0	0	0	0	0	\$0	a	
2. Enter and update information into agency recordkeeping system	2	91	182	182	9	18	\$9,719	b	
3. Required activities									
A. Observe initial performance test	12	1	17	17	1	2	\$897	c, d	
B. Observe surface methane monitoring quarterly	20	18	364	364	18	36	\$37,892	c	
C. Review operating parameters	1	7	7	7	0	1	\$374	d	
D. Review continuous parameter monitoring	1	91	91	91	5	9	\$4,859	e	
E. Review notification of performance test	2	7	14	14	1	1	\$748	d	
4 Excess Emissions Enforcement Activities	24	1	17	17	1	2	\$897	f	
5 Notification requirements									
A. Review amended design capacity report	2	0	0	0	0	0	\$0	g	
6. Reporting requirements									
A. Review initial design capacity report	1	0	0	0	0	0	\$0	h	
B. Review annual NMOC emission rate report	2	20	39	39	2	4	\$2,083	i	
C. Review landfill closure report	1	0	0	0	0	0	\$0	j	
D. Review equipment removal report	1	0	0	0	0	0	\$0	j	
E. Review Collection and Control System Design Plan	15	7	105	105	5	11	\$5,607	d	
F. Review Revised Collection and Control System Design Plan	5	1	4	4	0	0	\$187	k	
G. Review Initial Performance Test	12	7	84	84	4	8	\$4,486	d	
H. Review Annual Report	2	91	182	182	9	18	\$9,719		
I. Review Corrective Action Analysis	1.25	2	3	3	0	0	\$134	n	
J. Review Implementation Timeline	1.25	2	3	3	0	0	\$134	n	
K. Review Root Cause Analysis	1.25	2	3	3	0	0	\$134	n	
L. Wet Landfills Monitoring Report	1	32	32	32	2	3	\$1,709	o	
7. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip							\$22,109	m
TOTAL BURDEN AND COST (SALARY)				1,145	57	114	\$101,685		
TOTAL ANNUAL HOURS						1,316			

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$1,014 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2018. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2018.

f Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

g Assumes no landfills during this ICR period will have modifications.

h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. Assumes no landfills will submit an amended design capacity report.

i Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

j We have assumed that no controlled landfill will close or remove equipment during this ICR period.

k Assumes 10 percent of respondents submitting a 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).

l Assumes the following labor rates: \$64.16 per hour for Management labor; \$47.62 per hour for Technical labor, and \$25.76 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2016 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule/>

m Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

n Number of occurrences is based on the assumption that one public and one private landfill subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.

o While this data is being collected to inform future standards, it is assumed the agency will briefly review each report submitted by the landfills during the reporting year. Since the initial year reports include historical data, when available, the review of the report in the initial year will take additional time than subsequent year reports.

**Table 3.C. Annual Federal Government Burden and Cost of Recordkeeping and Reporting
for Municipal Solid Waste Landfills - Subpart XXX - Year 3**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ *	Footnotes
1. Read and understand rule requirements	40	0	0	0	0	0	\$0	a
2. Enter and update information into agency recordkeeping system	2	104	208	208	10	21	\$11,107	b
3. Required activities								
A. Observe initial performance test	12	3	31	31	2	3	\$1,666	c, d
B. Observe surface methane monitoring quarterly	20	21	416	416	21	42	\$43,306	c
C. Review operating parameters	1	13	13	13	1	1	\$694	d
D. Review continuous parameter monitoring	1	104	104	104	5	10	\$5,554	e
E. Review notification of performance test	2	13	26	26	1	3	\$1,388	d
4 Excess Emissions Enforcement Activities	24	1	31	31	2	3	\$1,666	f
5 Notification requirements								
A. Review amended design capacity report	2	0	0	0	0	0	\$0	g
6. Reporting requirements								
A. Review initial design capacity report	1	0	0	0	0	0	\$0	h
B. Review annual NMOC emission rate report	2	5	10	10	1	1	\$534	i
C. Review landfill closure report	1	0	0	0	0	0	\$0	j
D. Review equipment removal report	1	0	0	0	0	0	\$0	j
E. Review Collection and Control System Design Plan	15	13	195	195	10	20	\$10,413	d
F. Review Revised Collection and Control System Design Plan	5	1	7	7	0	1	\$347	k
G. Review Initial Performance Test	12	13	156	156	8	16	\$8,330	d
H. Review Annual Report	2	104	208	208	10	21	\$11,107	
I. Review Corrective Action Analysis	1.25	2	3	3	0	0	\$134	n
J. Review Implementation Timeline	1.25	2	3	3	0	0	\$134	n
K. Review Root Cause Analysis	1.25	2	3	3	0	0	\$134	n
L. Wet Landfills Monitoring Report	1	32	32	32	2	3	\$1,709	o
7. Travel Expenses for Tests Attended	3 days * (\$118 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$1128 per trip						\$26,395	m
TOTAL BURDEN AND COST (SALARY)				1,444	72	144	\$124,617	
TOTAL ANNUAL HOURS						1,661		

a Number of occurrences is the number of EPA Regions (10 regions). This is a one-time occurrence that is only incurred during the first year of compliance.

b Number of occurrences is based on the total number of landfills that are subject to the standard as well as the number of sources that fall below the thresholds of the standard.

c Number of occurrences is based on the assumption that EPA personnel will observe 20% of the landfills where initial performance tests and surface methane monitoring that occur. Cost to conduct surface methane monitoring includes time for monitor rental for agency as well as agency labor, which is \$1,014 per occurrence based on the size of the landfills expected to install controls beginning in year 2020.

d Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2019. This is a one-time occurrence that is only incurred during the first year of compliance.

e Number of occurrences is based on the estimated number of controlled landfills expected to come online or modify by 2019.

f Number of occurrences is based on the assumption that of the landfills that test, 10% of them will have exceedances and need enforcement.

g Assumes no landfills during this ICR period will have modifications.

h No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume. Assumes no landfills will submit an amended design capacity report.

i No additional landfills subject to this subpart are estimated to have a design capacity of less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume.

j Number of occurrences is the number of uncontrolled landfills that use Tier 1 or Tier 2 calculations for their NMOC reports.

k We have assumed that no controlled landfill will close or remove equipment during this ICR period.

l Assumes 10 percent of respondents submitting a 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).

m Assumes the following labor rates: \$64.16 per hour for Management labor; \$47.62 per hour for Technical labor, and \$25.76 per hour for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2016 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. These rates can be obtained from the OPM web site, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule/>

n Total cost is based on the number of trips taken by EPA to observe performance tests in year 1 (3.A. & 3.B.) multiplied by \$1128 per trip. The source for hotel and meals/incidental costs is based on FY' 15 per diem rates, averaged across all locations in the United States. Airfares are estimated based on experience from other rulemakings. See: <http://www.gsa.gov/portal/category/100120>

o Number of occurrences is based on the assumption that one public and one private landfill subject to controls will have at least one wellhead exceedance that takes longer than 60 days to correct.

p While this data is being collected to inform future standards, it is assumed the agency will briefly review each report submitted by the landfills during the reporting year. Since the initial year reports include historical data, when available, the review of the report in the initial year will take additional time than subsequent year reports.