

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)  
EPA ICR Number 1557.08, OMB Control Number 2060-0220

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Municipal Solid Waste Landfills were proposed on May 30, 1991, promulgated on May 12, 1996, and amended on June 16, 1998 (63 FR 32753), February 24, 1999 (64 FR 9262), and April 10, 2000 (65 FR 18909). These standards apply to municipal solid waste landfills for which construction, modification, or reconstruction commences on or after May 30, 1991. This information is being collected to assure compliance with 40 CFR part 60 subpart WWW.

In general, all NSPS standards require initial notifications, performance tests, periodic reports, design plans, equipment removal, and closure. In addition, owners and operators are required to maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative, as well as maintain records of the reports, system design, performance tests, monitoring, exceedances, plot map, and well locations. The recordkeeping and reporting requirements specific to municipal solid waste landfills are detailed in Section 4(b) of this supporting statement. These notifications, reports, and records are essential in determining compliance and are required of all affected facilities subject to NSPS.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

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

Approximately 183 respondents are currently subject to the regulation, and it is estimated that four additional respondents per year will become subject to the regulation in the next three years.

In the United States, there are approximately 183 municipal solid waste facilities, which

are owned and operated by the municipal solid waste industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal, or the Federal government; all are privately owned for-profit businesses. The burden to the “Affected Public” is listed in Table 1: Annual Industry Burden and Cost – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown in Table 2: Average Annual EPA Burden – NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

In the development of the Information Collection Request (ICR), we addressed the Office of Management and Budget (OMB) “Terms of Clearance (TOC)” on the active ICR. The TOC are as follows:

This collection of information is approved for 3 years. Before resubmission of this ICR, the Agency should update wage estimates, continuing to refer most recently available date from Bureau of Labor Statistics. In addition, the agency should verify the number of respondent entities.

EPA has addressed each item of concern in the TOC. The respondent burden, universe, labor rates, and capital cost have been thoroughly checked, and all estimates updated.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports;  
(C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at

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

In the Administrator's judgment, methane, carbon dioxide, and non-methane organic gas compound emissions from municipal solid waste landfills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart WWW.

### **2(b) Practical Utility/Users of the Data**

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

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

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

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart WWW.

### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

The Agency's industry experts have been consulted and the Agency's internal data sources and projections of industry and growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. Otis is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we reviewed information available from the United States Census Bureau and websites covering municipal solid waste landfills. We also consulted with the EPA Office of Air Quality Planning and Standards, Information Transfer, and Program Integration Division; the Solid Waste Association of North America (SWANA) at (240) 494-2241, and the National Solid Waste Management Association at (202) 364-3773.

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

### **3(d) Effects of Less Frequent Collection**

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

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program

is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

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

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are municipal solid waste landfills. The Standard Industrial Classification (SIC) codes for the respondents affected by the standards is 9511, which corresponds to the North American Industry Classification System (NAICS) 924110 for Air and Water Resources and Solid Waste Management, and SIC 4953, which corresponds to NAICS 562212 for Solid Waste Landfill.

### **4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

#### **(i) Data Items**

In this ICR, all data recorded and/or reported are required by NSPS for Municipal Solid Waste Landfill (40 CFR Part 60, Subpart WWW) (Renewal).

A source must make the following reports:

<b>Notifications</b>	<b>Standard Citation by Section</b>
Initial design capacity report	60.7(a)(1), 60.757(a)
Notification of actual startup	60.7(a)(3)

<b>Notifications</b>	<b>Standard Citation by Section</b>
Initial and annual non-methane organic compounds (NMOC) emission rate reports	60.757(b)
Collection and control system design plan	60.757(c)
Landfill closure report	60.757(d)
Equipment removal report	60.757(e)
Initial and annual operations reports	60.8, 60.757(f)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of maximum design capacity, refuse-in-place, year-by-year waste acceptance rate (maintain for 5 years)	60.758(a)
Maintain records of system design and initial performance test/compliance determination (must be kept for life of the control equipment; records of subsequent tests must be maintained for 5 years)	60.758(b)
Maintain records of monitoring for five years	60.758(c)
Maintain records of plot map and well locations for the life of the landfill (for life of the collection system)	60.758(d)
Maintain records of collection and control system exceedances for 5 years	60.758(e)

### Electronic Reporting

Currently, respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Perform initial performance test, Reference Method 25, 25C, 18 test, and repeat performance test if necessary.
Write the notifications and reports listed above.

<b>Respondent Activities</b>
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

### **5(a) Agency Activities**

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

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance tests reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The Agency's experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standards, is the Online Tracking Information System (Otis) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

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

### **5(c) Small Entity Flexibility**

All of the current respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,971 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

## 6(b) Estimating Respondent Costs

### (i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$119.36	(\$56.84 + 110%)
Technical	\$ 99.18	(\$47.23 + 110%)
Clerical	\$ 49.35	(\$23.50 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2011, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The types of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital / Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Portable Methane Monitor	\$8,100	4	\$32,400	\$118	183	\$21,594

The total capital/startup costs for this ICR are \$32,400. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$21,594. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$53,994.

## 6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$4,146.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 +60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality rate of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 183 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is 183 per year.

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

<b>Number of Respondents</b>					
<b>Year</b>	<b>(A) Number of New Respondents</b>	<b>(B) Number of Existing Respondents</b>	<b>(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>	<b>(D) Number of Existing Respondents That Are Also New Respondents</b>	<b>(E) Number of Respondents (E=A+B+C-D)</b>
1	4	175	0	0	179
2	4	179	0	0	183
3	4	183	0	0	187
Average	4	179	0	0	183

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 183.

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

<b>Total Annual Responses</b>				
<b>(A) Information Collection Activity</b>	<b>(B) Number of Respondents</b>	<b>(C) Number of Responses</b>	<b>(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>	<b>(E) Total Annual Responses E=(BxC)+D</b>
Initial performance report	4	1	N/A	4
Initial design capacity report	4	1	N/A	4
Report of non-methane organic compounds flow rate	18	1	N/A	18
Report of tier 2 and 3 NMOC sampling	18	1	N/A	18
Annual reports	183	1	N/A	183
Total Number of Annual Responses				227

The number of Total Annual Responses is 227

The total annual labor costs are \$380,261. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor costs are \$380,261. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$53,994. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 92 labor hours at a cost of \$4,146. See Table 2: Annual Agency Burden and Cost - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal).

### **6(f) Reasons for Change in Burden**

The adjustment increase in burden from the most recently approved ICR is due to an increase in the number of new sources. Consultations with the Office of Air Quality Planning and Standards (OAQPS) and trade association revealed that there are approximately 183 sources subject to the rule, as compared to the previous ICR with 175 sources. We have also used the most updated labor rates.

Because there are new sources with reporting requirements, both the capital/startup costs and the operation and maintenance (O&M) costs of monitoring the equipment are incurred.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for the EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2011-0225, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Enforcement and Compliance Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket is (202) 566-1752. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0225 and OMB Control Number 2060-0220 in any correspondence.

**Part B of the Supporting Statement**

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

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

Burden item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions <sup>c</sup>	1	1	1	183	183	9.15	18.3	\$20,145.18
B. Required Activities <sup>d</sup>								
Initial performance test report	2	1	2	4	8	0.4	0.8	\$952.68
Surface methane monitoring quarterly	14	4	56	4	224	11.2	22.4	\$24,658.59
C. Create Information	Included in 3B							
D. Gather existing information	Included in 3B							
E. Write report								
Initial design capacity report <sup>e</sup>	2	1	2	4	8	0.4	0.8	\$952.68
Report of non-methane organic compounds (NMOC) flow rate <sup>f</sup>	2	1	2	18	36	1.8	3.6	\$3,962.99
Report of tier 2 and 3 NMOC sampling Change <sup>g</sup>	12	1	12	18	216	10.8	21.6	\$23,778.15
Initial performance test	Included in 3B							
Compliance report	Included in 3B							
Annual report <sup>h</sup>	8	1	8	183	1,464	73.2	146.4	\$161,161.51
Subtotal reporting						2,459.85		
4. Recordkeeping requirements								
A. Read Instructions	Included in 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Records of control system monitoring <sup>i</sup>	0.5	12	6	183	1,098	54.9	109.8	\$120,871.13
Record of accumulated refuse <sup>j</sup>	8	1	8	27	216	10.8	21.6	\$23,778.15
F. Train to train personnel	N/A							
G. Audits	N/A							
Subtotal Recordkeeping						1,511.1		
Subtotal Labor Burden					3,453	172.65	345.3	\$380,261.06
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						3,970.95 3,971(rounded)		\$380,261

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of existing respondents is 183 plus 4 additional new sources who will become subject to the rule over the three-year period of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$119.36 per hour for Executive, Administrative, and Managerial labor; \$99.18 per hour for Technical labor, and \$49.35 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2011, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We have assumed that it will take one hour for each respondent to read instructions as part of their reporting requirements.
- <sup>d</sup> We have assumed that 90 percent of new respondents will also have an active gas collection system.
- <sup>e</sup> We have assumed that it will take two hours for each respondent to complete the initial design capacity report.
- <sup>f</sup> We have assumed that 10 percent of respondents will have to complete the non-methane organic compounds flow rate report.
- <sup>g</sup> We have assumed that all sources completing reports of non-methane organic compounds flow will have to complete the non-methane organic compound sampling report.
- <sup>h</sup> We have assumed that each of the respondents will take eight hours once per year to write the annual report.
- <sup>i</sup> We have assumed that each respondent will take 0.5 hours once per month to enter the control system monitoring system.
- <sup>j</sup> We have assumed that 15 percent of respondents will take 8 hours to enter the record of accumulated refuse information.

**Table 2: Average Annual EPA Burden - NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) (Renewal)**

Burden item	(A) Technical person hours per occurrence	(B) Number of occurrences per year	(C) Technical person hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=0.05xE)	(G) Clerical hours per year (G=0.1xE)	(H) Total Cost, per year <sup>b</sup>
Review reports								
Initial design capacity	2	1	2	4	8	0.4	0.8	\$414.60
Review NMOC emission rate reports <sup>c</sup>	1	1	1	18	18	0.9	1.8	\$932.91
Review tier 2 calculations <sup>d</sup>	1	1	1	18	18	0.9	1.8	\$932.91
Review tier 3 calculations <sup>d</sup>	1	1	1	0	0	0	0	\$0
Annual report <sup>e</sup>	2	1	2	18	36	1.8	3.6	\$1,865.72
Subtotals Labor Burden and Cost					80	4	8	\$4,146.14
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						92		\$4,146

**Assumptions:**

<sup>a</sup> We have assumed that the average number of existing respondents is 183 plus 4 additional new sources who will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92x1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88x1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63x1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

<sup>c</sup> We have assumed that 10 percent of respondents will each take one hour once per year to review the non-methane organic compounds emission rate reports.

<sup>d</sup> We have assumed that 10 percent of respondents will each take one hour once per year to review tier 1 and 3 calculations.

<sup>e</sup> We have assumed that 10 percent of respondents will each take two hours once per year to review the annual report.