Assumptions
(1) schedule of CAM implementation used in 2006 RIA applies (no PSEU currently has Part 6
(2) "large" and "other" PSEUs have same level of effort for R&R activities
(3) existing and new PSEUs have same level of effort for R&R activities

Industry Labor Rates (2005$) (i)   **Permitting Authority Labor Rates (2005$) (ii)**

Clerical	$22.73	Technical	$49.16 (GS-12, Step 5)
Technical	$34.56	Management	$81.28 (GS-15, Step 5)
Management	$77.18		

(i) Labor rates, on a per-hour basis, are taken from the Bureau of Labor Statistics (BLS) Occupatio
Administrative and Support and Waste Management and Remediation Services, Educational Servic
selected with a base rate of $20.69, and for clerical personnel, Secretaries, Except Legal, Medical,

   base labor rate x 1.67 = loaded wage rate

Given the overhead cost adjustments, the final total loaded wage rates are $77.18 for managerial
(ii) Labor rates, on a per-hour basis, are taken from the U.S. Office of Personnel Management (OPN

Numbers of Facilities & PSEUs (ii)
From Tables IV-28 & IV-29 from January 2006 CAM RIA for Proposed Revisions
(DPV_calcs_cutoff.xls)

	Date	Current Permits Expiring and New Permits Issuedb OR Permits Revised	Monitoring Approach Submission	Review Requiremen tsc	Determine Approach	
		# Title V Permits	# PSEUs	# Facilities	# PSEUs w/o ex mone	# PSEUs w/ex mon
			78			
A Lg Rnwl	July 2007	1,627	92	2	52	40
	January 200	1,628	92	2	52	40
	July 2008	1,931	71	2	40	31
	January 200	1,931	71	2	40	31
	July 2009	1,485	65	2	37	28
	January 201	1,485		2	37	28
			2			
A Lg Rev	July 2007	115	2		1	1
	January 200	115	2		1	1
	July 2008	115	2		1	1
	January 200	115	4		2	2

	July 2009	115	2		1	1
	January 201	115			1	1
			472			
A Oth Rnwl	July 2007	1,627	559		174	385
	January 200	1,628	559		174	385
	July 2008	1,931	430		134	296
	January 200	1,931	430		134	296
	July 2009	1,485	396		123	273
	January 201	1,485			123	273
			5			
A Oth Rev	July 2007	115	5		2	3
	January 200	115	5		2	3
	July 2008	115	5		2	3
	January 200	115	10		3	7
	July 2009	115	5		2	3
	January 201	115			2	3
			557			
All	July 2007	3,484	658	2	228	430
	January 200	3,486	658	2	228	430
	July 2008	4,092	508	2	176	332
	January 200	4,092	515	2	179	336
	July 2009	3,200	468	2	162	306
	January 201	3,200		2	162	306
			1,215			
All	2007-08	6,970	1,166	4	456	860
	2008-09	8,184	983	4	355	668
	2009-10	6,400		4	325	611

(ii) All data in this table are for a set of nine sample States (AR, CO, IL, ME, MO, NC, TX, VA, WY) used in the

54 monitoring and this monitoring will be phased into permit renewals starting in 2007)

onal Employment Statistics Web site (http://www.bls.gov/oes/) as posted for May 2005. For eac
ces, Healthcare and Social Assistance, and Public Administration. For managerial labor, an eng
, and Executive were selected with a base rate of $13.37. The labor rates include fringe benefi

personnel, $34.56 for technical personnel, and $22.73 for clerical personnel.
M) Web site (http://www.opm.gov) and "loaded" using the same formula as for industry labor ra

Justification				Specify Monitoring Elements			
# PSEUs w/o ex mon		# PSEUs w/ex mon		# PSEUs w/o ex mon		# PSEUs w/ex mon	
Non-CEM/C(	CEM/COM re	Non-CEM/C(	CEM/COM re	Non-CEM/C(	CEM/COM re	Non-CEM/C(	CEM/COM re
52	0	40	0	52	0	40	0
52	0	40	0	52	0	40	0
40	0	31	0	40	0	31	0
40	0	31	0	40	0	31	0
37	0	28	0	37	0	28	0
37	0	28	0	37	0	28	0
1	0	1	0	1	0	1	0
1	0	1	0	1	0	1	0
1	0	1	0	1	0	1	0
2	0	2	0	2	0	2	0

1	0	1	0	1	0	1	0
1	0	1	0	1	0	1	0
174	0	385	0	174	0	385	0
174	0	385	0	174	0	385	0
134	0	296	0	134	0	296	0
134	0	296	0	134	0	296	0
123	0	273	0	123	0	273	0
123	0	273	0	123	0	273	0
2	0	3	0	2	0	3	0
2	0	3	0	2	0	3	0
2	0	3	0	2	0	3	0
3	0	7	0	3	0	7	0
2	0	3	0	2	0	3	0
2	0	3	0	2	0	3	0

228	0	430	0	228	0	430	0
228	0	430	0	228	0	430	0
176	0	332	0	176	0	332	0
179	0	336	0	179	0	336	0
162	0	306	0	162	0	306	0
162	0	306	0	162	0	306	0

456	0	860	0	456	0	860	0
355	0	668	0	355	0	668	0
325	0	611	0	325	0	611	0

2006 RIA for propsed revisions to CAM. The bottom line burden and cost calculations can be converted to

ch type of personnel, the wage was averaged across the following sectors: Manufacturing, Prof

gineering manager occupation was selected with a base hourly labor rate of $46.22, for technic

ts, including paid leave, insurance, etc. The labor rates are also adjusted by an overhead and

ates.

			Perform Monitoringd				
# PSEUs	Acceptable Systems	Upgrade Instr. Systems	Install Par Mon				
esponse			CO	NOx	PM	SO2	VOC
156	14	54	38	0	24	7	19
340	31	118	83	0	52	15	41
482	43	167	118	0	74	22	58
2	0	1	0	0	0	0	0
6	1	2	1	0	1	0	1

12	1	4	3	0	2	1	1
943							
2,061							
2,921							
5							
15							
30							

0	0	0	0	0	0	0	0
1,106	221	502	334	0	24	7	19
0	0	0	0	0	0	0	0
2,422	484	1,100	730	0	53	16	42
0	0	0	0	0	0	0	0
3,445	688	1,564	1,039	5	76	22	59

1,106	221	502	334	0	24	7	19
2,422	484	1,100	730	0	53	16	42
3,445	688	1,564	1,039	5	76	22	59

nationwide values by diving by 21.4%, which is the portion of nationwide Title V facilities represented by the

essional, Scientific, and Technical services,

cal personnel and environmental engineering technician was

profit rate of 160 percent. Therefore, the total "loaded" wage rates are calculated by the follo

				Renewals
Install CEM/COM	Acceptable Systems	Upgrade WP	Initiate WP	# PSEUs
0				
0				
0				
0				
0				

0				2
	206	445	293	
	449	973	641	
	637	1,379	908	
	1	2	2	
	3	7	5	
	7	14	9	5

0	0	0	0	0
0	207	447	295	0
0	0	0	0	0
0	453	980	646	0
0	0	0	0	0
0	643	1,393	918	7

0	207	447	295	0
0	453	980	646	0
0	643	1,393	918	7

ese States.

wing equation:

TABLE 6.1a Total Source Burden and Labor Costs for All "Large" and "Other" S

	Reporting and Recordkeeping Requirements	A **Clerical hours per occurrence**
1	Review Requirements[a]	5
2	Determine Monitoring Approach[b]	
	Units without existing monitoring	0.75
	Units with existing monitoring	0.25
3	Specify Monitoring Elements[b]	
	Units w/o existing monitoring: non CEM/COM responses	4
	Units w/o existing monitoring: CEM/COM responses	2
	Units with existing monitoring: non CEM/COM responses	2
	Units with existing monitoring: CEM/COM responses	1
4	Design Documentation *(Management)*[b]	
	Units w/o existing monitoring: non CEM/COM responses	0
	Units w/o existing monitoring: CEM/COM responses	0
	Units with existing monitoring: non CEM/COM responses	0
	Units with existing monitoring: CEM/COM responses	0
5	CAM Revisions	
	Units without existing monitoring	0
	Units with existing monitoring	0
6	CAM Renewal	2
7	Recordkeeping Activities	
	Incremental recordkeeping burden - Upgrade instrumental systems	0
	Incremental recordkeeping burden - Upgrade work practices	0
	Incremental recordkeeping burden - install VE monitor	0
	Daily recordkeeping - Install instrumental monitor	0
	Daily recordkeeping - Initiate work practices	0
8	Incremental reporting	0
9	Facility Certification[c]	0.39
	Total - 9 Sample States	

Total - Nationwide

Notes:

[a]Hours are per facility, not per PSEU; number of respondents are facilities, not PS

[b]One-time activity.

[c]3 hours per facility converted to impact per PSEU by dividing by the average num

[d]All hours are per PSEU unless otherwise noted.

Hours[d] and Costs Per Respondent

B	C	D	E	F	G
Technical hours per occurrence	Management hours per occurence ([A+B]x0.05)	Annual occurences	Annual person hours	Labor Cost/Year	Annualized Capital Costs
15	1	1	21	$709	$0
2.25	0.15	1	3.15	$106	$0
0.75	0.05	1	1.05	$35	$0
12	0.8	1	16.8	$567	$0
6	0.4	1	8.4	$284	$0
6	0.4	1	8.4	$284	$0
3	0.2	1	4.2	$142	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
2	0.1	1	2.1	$77	$0
1	0.05	1	1.05	$38	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
6	0.4	1	8.4	$284	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
1.5	0.075	260	409.5	$14,983	$0
1.5	0.075	260	409.5	$14,983	$0
0.5	0.025	2	1.05	$38	$0
0	0.020	1	0.41	$10	$0

SEUs

nber of Category A pollutant points per facility with at least one PSEU [7.6].

			Total Hours and Costs	
H	I	J	K	L
Annualized O&M Costs	Total number of respondents	Total Hours/Year (E x I)	Total Labor Cost	Total Capital & O&M Cost
$0	4	84	$2,837	$0
$0	456	1,437	$48,527	$0
$0	860	903	$30,492	$0
$0	456	7,663	$258,812	$0
$0	0	0	$0	$0
$0	860	7,223	$243,933	$0
$0	0	0	$0	$0
$0	456	1,916	$70,099	$0
$0	0	0	$0	$0
$0	860	1,806	$66,069	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	502	13,712	$501,726	$0
$0	447	12,216	$446,961	$0
$0	0	0	$0	$0
$0	384	157,159	$5,750,363	$0
$0	295	120,732	$4,417,529	$0
$0	1,106	1,161	$42,491	$0
$0	1,106	458	$11,608	$0
		326,470	$11,891,448	$0
		1,525,559	$55,567,515	$0

M
Total annual cost
$2,837
$48,527
$30,492
$258,812
$0
$243,933
$0
$70,099
$0
$66,069
$0
$0
$0
$0
$0
$501,726
$446,961
$0
$5,750,363
$4,417,529
$42,491
$11,608
$11,891,448

$55,567,515

TABLE 6.1b Total Source Burden and Labor Costs for All "Large" and "Other" S

	Reporting and Recordkeeping Requirements	Clerical hours per occurrence (A)
1	Review Requirements[a]	5
2	Determine Monitoring Approach[b]	
	Units without existing monitoring	0.75
	Units with existing monitoring	0.25
3	Specify Monitoring Elements[b]	
	Units w/o existing monitoring: non CEM/COM responses	4
	Units w/o existing monitoring: CEM/COM responses	2
	Units with existing monitoring: non CEM/COM responses	2
	Units with existing monitoring: CEM/COM responses	1
4	Design Documentation *(Management)*[b]	
	Units w/o existing monitoring: non CEM/COM responses	0
	Units w/o existing monitoring: CEM/COM responses	0
	Units with existing monitoring: non CEM/COM responses	0
	Units with existing monitoring: CEM/COM responses	0
5	CAM Revisions	
	Units without existing monitoring	0
	Units with existing monitoring	0
6	CAM Renewal	2
7	Recordkeeping Activities	
	Incremental recordkeeping burden - Upgrade instrumental systems	0
	Incremental recordkeeping burden - Upgrade work practices	0
	Incremental recordkeeping burden - install VE monitor	0
	Daily recordkeeping - Install instrumental monitor	0
	Daily recordkeeping - Initiate work practices	0
8	Incremental reporting	0
9	Facility Certification[c]	0.39
	Total - 9 Sample States	

Total - Nationwide

Notes:

[a]Hours are per facility, not per PSEU; number of respondents are facilities, not PS

[b]One-time activity.

[c]3 hours per facility converted to impact per PSEU by dividing by the average nur

[d]All hours are per PSEU unless otherwise noted.

Hours[d] and Costs Per Respondent

B	C	D	E	F	G
Technical hours per occurrence	Management hours per occurence ([A+B]x0.05)	Annual occurences	Annual person hours	Labor Cost/Year	Annualized Capital Costs
15	1	1	21	$709	$0
2.25	0.15	1	3.15	$106	$0
0.75	0.05	1	1.05	$35	$0
12	0.8	1	16.8	$567	$0
6	0.4	1	8.4	$284	$0
6	0.4	1	8.4	$284	$0
3	0.2	1	4.2	$142	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
2	0.1	1	2.1	$77	$0
1	0.05	1	1.05	$38	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
6	0.4	1	8.4	$284	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
1.5	0.075	260	409.5	$14,983	$0
1.5	0.075	260	409.5	$14,983	$0
0.5	0.025	2	1.05	$38	$0
0	0.020	1	0.41	$10	$0

SEUs

mber of Category A pollutant points per facility with at least one PSEU [7.6].

| | | Total Hours and Costs | | |
H	I	J	K	L
Annualized O&M Costs	Total number of respondents	Total Hours/Year (E x H)	Total Labor Cost	Total Capital & O&M Cost
$0	4	84	$2,837	$0
$0	355	1,118	$37,773	$0
$0	668	701	$23,686	$0
$0	355	5,965	$201,456	$0
$0	0	0	$0	$0
$0	668	5,611	$189,489	$0
$0	0	0	$0	$0
$0	355	1,491	$54,564	$0
$0	0	0	$0	$0
$0	668	1,403	$51,323	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	1,100	30,028	$1,098,717	$0
$0	980	26,751	$978,788	$0
$0	0	0	$0	$0
$0	840	344,158	$12,592,567	$0
$0	646	264,388	$9,673,829	$0
$0	2,422	2,543	$93,051	$0
$0	2,422	1,004	$25,420	$0
		685,245	**$25,023,501**	**$0**
		3,202,078	**$116,932,249**	**$0**

M
Total annual cost
$2,837
$37,773
$23,686
$201,456
$0
$189,489
$0
$54,564
$0
$51,323
$0
$0
$0
$0
$0
$1,098,717
$978,788
$0
$12,592,567
$9,673,829
$93,051
$25,420
$25,023,501

$116,932,249

TABLE 6.1c Total Source Burden and Labor Costs for All "Large" and "Other" S

	Reporting and Recordkeeping Requirements	A **Clerical hours per occurrence**
1	Review Requirements[a]	5
2	Determine Monitoring Approach[b]	
	Units without existing monitoring	0.75
	Units with existing monitoring	0.25
3	Specify Monitoring Elements[b]	
	Units w/o existing monitoring: non CEM/COM responses	4
	Units w/o existing monitoring: CEM/COM responses	2
	Units with existing monitoring: non CEM/COM responses	2
	Units with existing monitoring: CEM/COM responses	1
4	Design Documentation *(Management)*[b]	
	Units w/o existing monitoring: non CEM/COM responses	0
	Units w/o existing monitoring: CEM/COM responses	0
	Units with existing monitoring: non CEM/COM responses	0
	Units with existing monitoring: CEM/COM responses	0
5	CAM Revisions	
	Units without existing monitoring	0
	Units with existing monitoring	0
6	CAM Renewal	2
7	Recordkeeping Activities	
	Incremental recordkeeping burden - Upgrade instrumental systems	0
	Incremental recordkeeping burden - Upgrade work practices	0
	Incremental recordkeeping burden - install VE monitor	0
	Daily recordkeeping - Install instrumental monitor	0
	Daily recordkeeping - Initiate work practices	0
8	Incremental reporting	0
9	Facility Certification[c]	0.39
	Total - 9 Sample States	

Total - Nationwide

Notes:

[a]Hours are per facility, not per PSEU; number of respondents are facilities, not PS

[b]One-time activity.

[c]3 hours per facility converted to impact per PSEU by dividing by the average num

[d]All hours are per PSEU unless otherwise noted.

Hours[d] and Costs Per Respondent

B	C	D	E	F	G
Technical hours per occurrence	**Management hours per occurence ([A+B]x0.05)**	**Annual occurences**	**Annual person hours**	**Labor Cost/Year**	**Annualized Capital Costs**
15	1	1	21	$709	$0
2.25	0.15	1	3.15	$106	$0
0.75	0.05	1	1.05	$35	$0
12	0.8	1	16.8	$567	$0
6	0.4	1	8.4	$284	$0
6	0.4	1	8.4	$284	$0
3	0.2	1	4.2	$142	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
2	0.1	1	2.1	$77	$0
1	0.05	1	1.05	$38	$0
4	0.2	1	4.2	$154	$0
2	0.1	1	2.1	$77	$0
6	0.4	1	8.4	$284	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
0.5	0.025	52	27.3	$999	$0
1.5	0.075	260	409.5	$14,983	$0
1.5	0.075	260	409.5	$14,983	$0
0.5	0.025	2	1.05	$38	$0
0	0.020	1	0.41	$10	$0

SEUs

mber of Category A pollutant points per facility with at least one PSEU [7.6].

		Total Hours and Costs		
H	I	J	K	L
Annualized O&M Costs	Total number of respondents	Total Hours/Year (E x H)	Total Labor Cost	Total Capital & O&M Cost
$0	4	84	$2,837	$0
$0	325	1,022	$34,523	$0
$0	611	642	$21,684	$0
$0	325	5,452	$184,120	$0
$0	0	0	$0	$0
$0	611	5,137	$173,476	$0
$0	0	0	$0	$0
$0	325	1,363	$49,869	$0
$0	0	0	$0	$0
$0	611	1,284	$46,986	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	0	0	$0	$0
$0	7	59	$1,986	$0
$0	1,564	42,705	$1,562,560	$0
$0	1,393	38,025	$1,391,331	$0
$0	0	0	$0	$0
$0	1,201	491,762	$17,993,322	$0
$0	918	375,823	$13,751,189	$0
$0	3,445	3,617	$132,353	$0
$0	3,445	1,428	$36,158	$0
		968,403	$35,382,395	$0
		4,525,246	$165,338,292	$0

M
Total annual cost
$2,837
$34,523
$21,684
$184,120
$0
$173,476
$0
$49,869
$0
$46,986
$0
$0
$0
$0
$1,986
$1,562,560
$1,391,331
$0
$17,993,322
$13,751,189
$132,353
$36,158
$35,382,395

$165,338,292

TABLE 6.2 Average Source Burden and Labor Costs for All "Large" and "Other" Sour

Year	Annual Total Hours	Annual Labor Cost	Annual Capital & O&M Cost	Total annual cost
2007-08	1,525,559	$55,567,515	$0	$55,567,515
2008-09	3,202,078	$116,932,249	$0	$116,932,249
2009-10	4,525,246	$165,338,292	$0	$165,338,292
Total	**9,252,884**	**337,838,055**	**0**	**$337,838,055**
Average	**3,084,295**	**$112,612,685**	**$0**	**$112,612,685**

Burden per Response

Year	# PSEUs submitting reports	Annual Total Hours	Hours per PSEU	Hours per Facility[a]
2007-08	1,106	1,525,559	1,379	181
2008-09	2,422	3,202,078	1,322	174
2009-10	3,445	4,525,246	1,314	173
Total	**6,973**	**9,252,884**	**4,015**	**528**
Average	**2,324**	**3,084,295**	**1,338**	**176**

[a]Assumes 7.6 PSEUs per facility

ces - All Pollutants

TABLE 6.3a Total Permitting Authority Burden and Labor Costs for All "Larç

	Burden Item	Technical hours per occurence[a]	Occurences per year
1	CAM Activities		
	Rule Familiarization	54	0
	Applicability Determination	0.67	1,316
2	Initial CAM Review		
	Units w/o existing monitoring: non CEM/COM	2	456
	Units w/o existing monitoring: CEM/COM	1	0
	Units with existing monitoring: non CEM/COM	1	860
	Units with existing monitoring: CEM/COM	0.5	0
3	CAM Revisions		
	Units w/o existing monitoring	1	0
	Units with existing monitoring	0.5	0
4	CAM Renewals	1	0
5	Review Reports	1	2,212
6	Certifications	0.33	1,106
	Total - 9 Sample States		
	Total - Nationwide		

[a]All hours are per PSEU unless otherwise noted.

ge" and "Other" Sources - All Pollutants, 2007-08

C	D	E
Technical hours per year (AxB)	Management hours per year (C x 0.05)	Total cost per year
0	0	$0
882	44	$46,933
912	46	$48,561
0	0	$0
860	43	$45,769
0	0	$0
0	0	$0
0	0	$0
0	0	$0
2,212	111	$117,742
365	18	$19,427
5,231	**262**	**$278,432**
24,443	**1,222**	**$1,301,082**

TABLE 6.3b Total Permitting Authority Burden and Labor Costs for All "Larg

	Burden Item	A Technical hours per occurence[a]	B Occurences per year
1	CAM Activities		
	Rule Familiarization	54	0
	Applicability Determination	0.67	1,023
2	Initial CAM Review		
	Units w/o existing monitoring: non CEM/COM	2	355
	Units w/o existing monitoring: CEM/COM	1	0
	Units with existing monitoring: non CEM/COM	1	668
	Units with existing monitoring: CEM/COM	0.5	0
3	CAM Revisions		
	Units w/o existing monitoring	1	0
	Units with existing monitoring	0.5	0
4	CAM Renewals	1	0
5	Review Reports	1	4,844
6	Certifications	0.33	2,422
	Total - 9 Sample States		
	Total - Nationwide		

[a]All hours are per PSEU unless otherwise noted.

ge" and "Other" Sources - All Pollutants, 2008-09

C	D	E
Technical hours per year (AxB)	**Management hours per year (C x 0.05)**	**Total cost per year**
0	0	$0
685	34	$36,484
710	36	$37,799
0	0	$0
668	33	$35,554
0	0	$0
0	0	$0
0	0	$0
0	0	$0
4,844	242	$257,840
799	40	$42,544
7,707	**385**	**$410,220**
36,013	**1,801**	**$1,916,914**

TABLE 6.3c Total Permitting Authority Burden and Labor Costs for All "Larg

	Burden Item	A **Technical hours per occurence**[a]	B **Occurences per year**
1	CAM Activities		
	Rule Familiarization	54	0
	Applicability Determination	0.67	992
2	Initial CAM Review		
	Units w/o existing monitoring: non CEM/COM	2	325
	Units w/o existing monitoring: CEM/COM	1	0
	Units with existing monitoring: non CEM/COM	1	611
	Units with existing monitoring: CEM/COM	0.5	0
3	CAM Revisions		
	Units w/o existing monitoring	1	0
	Units with existing monitoring	0.5	0
4	CAM Renewals	1	7
5	Review Reports	1	6,890
6	Certifications	0.33	3,445
	Total - 9 Sample States		
	Total - Nationwide		

[a]All hours are per PSEU unless otherwise noted.

C	D	E
Technical hours per year (AxB)	Management hours per year (C x 0.05)	Total cost per year
0	0	$0
665	33	$35,394
649	32	$34,546
0	0	$0
611	31	$32,549
0	0	$0
0	0	$0
0	0	$0
7	0	$373
6,890	345	$366,746
1,137	57	$60,513
9,959	**498**	**$530,121**
46,539	**2,327**	**$2,477,200**

TABLE 6.4 Average Permitting Authority Burden and Labor Costs for All "Large" and

Year	Annual Total Hours	Total annual cost
2007-08	25,665	$1,301,082
2008-09	37,813	$1,916,914
2009-10	48,866	$2,477,200
Total	**112,344**	**$5,695,196**
Average	**37,448**	**$1,898,399**

"Other" Sources - All Pollutants

TABLE 6.5
Federal Labor Hours and Costs for "Large & Other" Sources - All Pollutants, 2007

CAM Activities	Agency Hours		
	Technical Hours per Year	Management Hours per Year	Total Hours per Year
Rule Familiarization [1]	570	30	600
Review CAM Plans [1]	5,130	270	5,400

[1] Based on input from the Regions -- one region said they spent .1 FTE or less and Region 9 said they spent .
We also assumed the vast majority of the time is spent reviewing CAM plans -- about 1/10 of the time was for F

7/08-2009/10

Agency Responses			Total National			
2007	2008	2009	Technical Hours	Management Hours	Total Hours	Costs
1	1	1	1,710	90	1,800	$91,387
1	1	1	15,390	810	16,200	$822,482
Total Cost and Burden:			17,100	900	18,000	$913,869

5 FTE. We assumed .3 FTEs, or 6,000 hours (600 hours/region * 10 regions).
Rule familiarization.

Average

Cost per Year

$30,462

$274,161

$304,623