

Respondent (Industry)  
Rates

	Mgmt.	Tech.	Cler.
Raw May 2006 Labor Rate from OES tables	\$52.71	\$35.61	\$14.00
Loaded Rate Rate+110%rate	\$110.69	\$74.78	\$29.40
Loaded with ECI factor for June 2006 to September 2007	\$115.12	\$77.77	\$30.58

Sources: May 2006 OES query tables.

Industry: Sectors 31, 32, and 33 - Manufacturing (NAICS code 31--34)	Hourly mean wage
<b>Engineering Managers(119041)</b>	52.71
<b>Environmental Engineers(172081)</b>	35.61
<b>Secretaries, Except Legal, Medical, and Executive(436014)</b>	14
<a href="http://www.bls.gov/soc/home.htm">http://www.bls.gov/soc/home.htm</a> <a href="http://www.bls.gov/bls/naics.htm">http://www.bls.gov/bls/naics.htm</a>	
Data extracted on November 7, 2007	

Table 2. Employment Cost Index for wages and salaries, by ownership, occupational group, and industry

<http://www.bls.gov/news.release/eci.t02.htm>

Industry

Goods-producing industries(3).....	104.7	105.3	.7	.7	.9	.5	.8	1.0	.7	.6
Construction.....	106.0	106.7	.9	.7	1.2	.7	1.1	1.3	.8	.7
Manufacturing.....	103.8	104.4	.6	.5	.9	.2	.7	.8	.5	.6

Agency Rates

(GS- 15, step 5)	Mgmt.	50.54	80.864	<a href="http://www.opm.gov/oca/07tables/pdf/gs_h.pdf">http://www.opm.gov/oca/07tables/pdf/gs_h.pdf</a> .
(GS- 12, step 5)	Tech.	30.57	48.912	
(GS-7, step 5)	Cler.	17.24	27.584	

**Attachment A: Industry Burden and Cost for Responding to the Stack Test Component**

	Hours and Costs Per Respondent/Activity <sup>1</sup>							Total Hours and Costs			
	Emission Contractor	Tech.	Mgr. <sup>2</sup>	Cler. <sup>2</sup>	Total Respon.	Total Labor	Occurrences/		Number <sup>3</sup>	Total	Total
	\$105.00	\$77.77	\$115.12	\$30.58	Hours/	Cost/	Respondent/	O & M	of	Hours/	Cost/
	per hour	per hour	per hour	per hour	Activity	Activity	Year	Cost	Respond.	Year	Year
<b>Collection activities</b>											
1. Secure emission test contractor/review proposal <sup>4</sup>		40.0	2.0	4.0	46	\$3,463	1	\$0	277	12,742	\$959,370
2. Fuel sampling with stack testing <sup>4</sup>	SEE APPENDIX 1							61	0	\$50,000	
3. Fuel analyses with stack testing <sup>4</sup>	SEE APPENDIX 1							61	0	\$18,000	
4. Conduct stack testing and prepare report <sup>4</sup>	SEE APPENDICES 1 and 2							239	0	\$8,378,000	
5. Set-up, gather data using CEM equipment and prepare report <sup>4</sup>	SEE APPENDIX 1							42	0	\$5,740,000	
6. Supervise stack testing, monitoring and/or fuel analysis <sup>5</sup>		24	1.2	2.4	28	\$2,078	1	\$0	277	7,645	\$575,622
7. Review emission stack data, monitoring data, and/or fuel analysis data for accuracy and completeness <sup>5</sup>		8	0.4	0.8	9	\$693	1	\$0	277	2,548	\$191,874
8. Submit testing, monitoring and/or fuel analysis data <sup>5</sup>		1	0.1	0.1	1	\$87	1	\$0	277	319	\$23,984
TOTAL										23,254	\$15,936,851

1. Labor rates and associated overhead costs were based on May 2006 raw labor rates for the Manufacturing Sector (NAICS 31 thru 34), loaded using a factor of 110%, and indexed to June 2007 using the Employment Cost Index. The resulting loaded of \$115.12 for management personnel, \$77.77 for technical personnel, and \$30.58 for clerical personnel. These values were taken from the Bureau of Labor Statistics Occupational Employment Statistics Survey Web site and reflect the latest values available (May 2006), and the Employment Cost Index is located at: <http://www.bls.gov/news.release/eci.t02.htm>

2. Management hours are assumed to be 5 percent of technical hours, and clerical hours are assumed to be 10 percent of technical hours.

3. The number of respondents as well as the type of testing, fuel analysis, and monitoring required is based on the facilities listed in Appendices 1 and 2. Only a subset of boilers and process heaters were selected for fuel analysis and continuous emissions monitoring. CISWI units were only selected for stack testing, and a subset of boilers and process heaters were also selected for stack testing.

4. The agency assumes that the respondent will contract out fuel analyses, emissions testing, and monitoring services requested at their unit. Refer to Appendices 1 and 2 for facility specific costs for contractors to conduct these activities.

5. Hourly burden was estimated using the same corresponding line item burden from Table 1 of the "Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort." September 3, 1998. ICR number: 1858.01. This document is in Docket A-92-55.

## Attachment B: Agency Burden and Cost

	Hours and Costs Per Respondent/Activity <sup>1</sup>						Total Hours and Costs			
	Tech.	Mgr. <sup>2</sup>	Cler. <sup>2</sup>	Total Respon.	Total Labor	Occurrences/	O & M	Number	Total	Total
	\$48.91	\$80.86	\$27.58	Hours/	Cost/	Respondent/		of	Hours/	Cost/
	per hour	per hour	per hour	Activity	Activity	Year	Cost	Respond.	Year	Year
<b>Collection activities</b>										
<b>A. Stack Test Component</b>										
<b>1. Send Test Request Letter</b>	0	0.0	0.3	0	\$7	1	\$5	277	69	\$3,295
1. Determine sites to be selected for emissions testing	200	10.0	20.0	230	\$11,143	1	\$0	1	230	\$11,143
2. Audit Stack Tests <sup>3</sup>	40	2.0	4.0	46	\$2,229	1	\$0	12	552	\$26,743
3. Review stack sampling data for accuracy and completeness <sup>3</sup>	16	0.8	1.6	18	\$891	1	\$0	277	5,097	\$246,923
4. Analyze fuel sampling <sup>3</sup>	12	0.6	1.2	14	\$669	1	\$0	61	842	\$40,782
5. Analyze CEM Data	16	0.8	1.6	18	\$891	1	\$0	42	773	\$37,440
6. Answer respondent questions <sup>4</sup>	0.25	0.0	0.0	0	\$14	1	\$0	38	11	\$529
7. Analyze requests for confidentiality <sup>4</sup>	1	0.1	0.1	1	\$56	1	\$0	38	44	\$2,117
<b>TOTAL</b>									7,617	\$368,971

1. Labor rates for EPA personnel were used for all public-sector personnel, including employees of State agencies. Source for EPA labor rates: Department of Personnel Management, "Salary Table 2003 - GS," [http://www.opm.gov/oca/07tables/pdf/gs\\_h.pdf](http://www.opm.gov/oca/07tables/pdf/gs_h.pdf). For the managerial labor rate, level GS-15, step 5 was used; for the technical labor rate, level GS-12, step 5 was used; for the clerical labor rate, level GS-7, step 5 was used. These levels and steps were used in Table 4 of the "Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort." September 3, 1998. ICR number: 1858.01. This document is in Docket A-92-55. All agency labor rates include a multiplier of 1.6 to account for overhead and fringe benefit costs.

2. Management hours are assumed to be 5 percent of technical hours, and clerical hours are assumed to be 10 percent of technical hours.

3. The Agency assumes that it will audit 5 percent of the stack tests conducted. The hours associated with each audit was estimated using the same corresponding line item burden from Table 3 of the "Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort." September 3, 1998. ICR number: 1858.01. This document is in Docket A-92-55.

7. The Agency assumes that 10 percent of respondents will have one question. The hours associated with each question was estimated using the same corresponding line item burden from Table 3 of the “Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort.” September 3, 1998. ICR number: 1858.01. This document is in Docket A-92-55.

8. The Agency assumes that 10 percent of respondents will claim information to be confidential. The hours associated with evaluation of confidentiality was estimated using the same corresponding line item burden from Table 3 of the “Information Collection Request for Electric Utility Steam Generating Unit Mercury Emissions Information Collection Effort.” September 3, 1998. ICR number: 1858.01. This document is in Docket A-92-55.