

# Appendix J: Burden and Cost for Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, SS)

Appendix J-1: Detailed Burden and Cost  
Appendix J-2: Summary of Burden and Cost by Activity and Year  
Appendix J-3: Change in Burden and Cost

**J-1a: SUBPART I: ELECTRONICS MANUFACTURING (1) (2)**

Source Category	Annual Burden & Cost, All Respondents											
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
Non-Semiconductors	3	1	3	720.0	83.5	80.5	0.8	884.8	\$51,624	\$0	\$0	\$51,624
Large Semiconductors*	29	1	29	9,617.4	1,011.1	763.3	7.5	11,399.4	\$671,428	\$3,511,900	\$0	\$4,185,328
Non-Large Semiconductors	62	1	62	19,858.8	1,417.0	1,361.0	16.1	22,652.9	\$1,327,930	\$0	\$0	\$1,327,930
<b>Total</b>	<b>94</b>	<b>1.0</b>	<b>94.0</b>	<b>30,196.3</b>	<b>2,511.6</b>	<b>2,204.8</b>	<b>24.4</b>	<b>34,937.1</b>	<b>\$2,050,981</b>	<b>\$3,511,900</b>	<b>\$0</b>	<b>\$5,562,881</b>

(1) Does not include the burden or cost for provision of information on parent companies' NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).  
 (2) EPA is currently updating certain provisions of subpart I. Those updates are reflected in the ICR for that rulemaking effort.

**NON-SEMICONDUCTORS**

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	\$59.12	\$77.23	\$31.35	\$109.94	\$0
QA/OC	-	-	-	-	\$0
Recordkeeping	24.70	2.39	5.70	-	\$1,824
Sampling and Analysis (Calculations)	-	-	-	-	-
Reporting	186.49	11.17	11.00	-	\$12,233
	28.82	14.26	10.14	0.26	\$3,152
<b>Total</b>	<b>240.01</b>	<b>27.82</b>	<b>26.84</b>	<b>0.26</b>	<b>\$17,208</b>

**LARGE SEMICONDUCTORS\***

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	\$59.12	\$77.23	\$31.35	\$109.94	\$0
QA/OC	-	-	-	-	\$0
Recordkeeping	24.70	2.39	5.70	-	\$1,824
Sampling and Analysis (Calculations)	-	-	-	-	-
Reporting	246.14	18.18	10.32	-	\$16,279
	60.80	14.30	10.30	0.26	\$5,050
<b>Total</b>	<b>331.64</b>	<b>34.87</b>	<b>26.32</b>	<b>0.26</b>	<b>\$23,153</b>

\*In addition, large semiconductors incur capital costs per facility of: \$121,100

**NON-LARGE SEMICONDUCTORS**

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	\$59.12	\$77.23	\$31.35	\$109.94	\$0
QA/OC	-	-	-	-	\$0
Recordkeeping	24.70	2.39	5.70	-	\$1,824
Sampling and Analysis (Calculations)	-	-	-	-	-
Reporting	266.78	6.21	6.11	-	\$16,443
	28.82	14.26	10.14	0.26	\$3,152
<b>Total</b>	<b>320.30</b>	<b>22.86</b>	<b>21.95</b>	<b>0.26</b>	<b>\$21,418</b>

**J-1b: SUBPART L: FLUORINATED GHG PRODUCTION (1)**

Source Category	Annual Burden & Cost, All Respondents											
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
Process Vent	11	1	11	1,902.8	51.6	408.7	-	2,363.1	\$129,291	\$28,217	\$14,080	\$171,588
Mass Balance	3	1	3	165.6	12.7	50.1	-	228.4	\$12,344	\$5,152	\$0	\$17,496
<b>Total</b>	<b>14</b>	<b>1.0</b>	<b>14.0</b>	<b>2,068.4</b>	<b>64.4</b>	<b>458.8</b>	<b>-</b>	<b>2,591.5</b>	<b>\$141,635</b>	<b>\$33,369</b>	<b>\$14,080</b>	<b>\$189,084</b>

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).

**PROCESS VENT**

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	\$59.12	\$77.23	\$31.35	\$109.94	\$0
QA/QC	17.00	0.85	8.50	-	\$1,337
Recordkeeping	32.83	2.39	16.33	-	\$2,637
Sampling and Analysis	107.73	0.75	-	-	\$6,427
Reporting	15.43	0.70	12.33	-	\$1,353
<b>Total</b>	<b>172.98</b>	<b>4.69</b>	<b>37.15</b>	<b>-</b>	<b>\$11,754</b>

**MASS BALANCE**

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	\$59.12	\$77.23	\$31.35	\$109.94	\$0
QA/QC	23.20	1.15	9.30	-	\$1,752
Recordkeeping	24.70	2.39	5.70	-	\$1,824
Sampling and Analysis	-	-	-	-	\$0
Reporting	7.30	0.70	1.70	-	\$539
<b>Total</b>	<b>55.20</b>	<b>4.24</b>	<b>16.70</b>	<b>-</b>	<b>\$4,115</b>

J-1c: SUBPART DD: Sulfur Hexafluoride (SF6) from Electric Power Systems (1)

Source Category	Annual Burden & Cost, All Respondents											
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
Sulfur Hexafluoride (SF6) From Electric Power Systems	141	1	141	6,638.2	1,640.5	2,260.9	-	10,539.6	\$590,027	\$0	\$0	\$590,027
Total	141	1.0	141.0	6,638.2	1,640.5	2,260.9	-	10,539.6	\$590,027	\$0	\$0	\$590,027

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).

Sulfur Hexafluoride (SF6) from Electric Power Systems

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	4.63	2.11	3.67	-	\$551
Recordkeeping	8.93	5.92	7.05	-	\$1,207
Sampling and Analysis	29.32	1.86	-	-	\$1,877
Reporting	4.20	1.74	5.32	-	\$550
Total	47.08	11.63	16.03	-	\$4,185

J-1d: Subpart QQ: Imports and Exports of Fluorinated GHGs in Products (1)

Source Category	No. Respondents	Responses/Respondent	Total Responses	Annual Burden & Cost, All Respondents		Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
				Burden - Technical (hrs)	Burden - Managerial (hrs)									
HFC Equipment Importers	50	1	50	2,954.0	366.5	156.5	-	-	3,467.0	\$207,079	\$0	\$0	\$0	\$207,079
Sf6 Equipment Importers	8	1	8	472.6	57.0	25.0	-	-	554.7	\$33,133	\$0	\$0	\$0	\$33,133
Close-Cell Foam Importers	50	1	50	2,954.0	366.5	156.5	-	-	3,467.0	\$207,079	\$0	\$0	\$0	\$207,079
HFC Equipment Exporters	25	1.0	25	1,477.0	178.3	78.3	-	-	1,733.5	\$103,540	\$0	\$0	\$0	\$103,540
Sf6 Equipment Importers	0	1.0	0	-	-	-	-	-	\$0	\$0	\$0	\$0	\$0	\$0
Close-Cell Foam Exporters	25	1.0	25	1,477.0	178.3	78.3	-	-	1,733.5	\$103,540	\$0	\$0	\$0	\$103,540
Total	158	-	158.0	9,334.6	1,126.5	494.5	-	-	10,955.7	\$654,370	\$0	\$0	\$0	\$654,370

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).

HFC EQUIPMENT IMPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling and Analysis	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

Sf6 EQUIPMENT IMPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling and Analy	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

CLOSE-CELL FOAM IMPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling and Analysis	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

HFC EQUIPMENT EXPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

Sf6 EQUIPMENT IMPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

CLOSE-CELL FOAM EXPORTERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	-	-	-	-	\$0
QA/QC	-	-	-	-	\$0
Recordkeeping	25.08	3.13	3.13	-	\$1,823
Sampling	31.00	3.00	-	-	\$2,064
Reporting	3.00	1.00	-	-	\$255
Total	59.08	7.13	3.13	-	\$4,142

J-1e: Subpart SS: SF6 Equipment Producers (1)

Source Category	Annual Burden & Cost, All Respondents											
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
Sf6 Equipment Producers	10	1	10	220.0	85.0	129.0	-	434.0	\$23,615	\$0	\$120	\$23,736
Total	10	10	10.0	220.0	85.0	129.0	-	434.0	\$23,615	\$0	\$120	\$23,736

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).

SF6 EQUIPMENT PRODUCERS

Activity	Labor Hours / Rate				Labor\$/Yr per Unit or Facility (2011\$)
	Technical	Management	Clerical	Legal	
Planning	1.50	1.00	-	-	\$166
QA/OC	-	-	-	-	\$0
Recordkeeping	-	-	0.20	-	\$6
Sampling and Analysis (Calculations)	17.00	4.00	11.00	-	\$1,659
Reporting	3.50	3.50	1.70	-	\$531
Total	22.00	8.50	12.90	-	\$2,362

Capital costs per facility:

\$0

O&M costs per facility:

\$12

**APPENDIX J-2: Summary of Burden and Cost for Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, and SS)**

Source Category	Annual Average - 3 year ICR Period											
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
I - Electronics Manufacturing	94	1	94	30,196	2,511.6	2,204.8	24.4	34,937.1	\$2,050,981	\$3,511,900	\$0	\$5,562,881
L - Fluorinated Gas Production	14	1	14	2,068	64.4	458.8	-	2,591.5	\$141,635	\$33,369	\$14,080	\$189,084
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	6,638	1,640.5	2,260.9	-	10,539.6	\$590,027	\$0	\$0	\$590,027
QQ - Imports and Exports of Fluorinated GHGs in Products	158	1	158	9,335	1,126.5	494.5	-	10,955.7	\$654,370	\$0	\$0	\$654,370
SS - SF6 Equipment Producers	10	1	10	220	85.0	129.0	-	434.0	\$23,615	\$0	\$120	\$23,736
<b>TOTAL</b>	417	1	417	48,457	5,428.0	5,548.0	24.4	59,458.0	\$3,460,628	\$3,545,269	\$14,200	\$7,020,098

### J3. Change in Burden and Cost for Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, and SS)

#### Current Cost & Burden (OMB No. 2060-0650, ICR No. 2373.02-2373.04)

##### First-Year Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$1,913,073	\$990,379	\$0	\$2,903,452
L - Fluorinated Gas Production	14	1	14	52,740	\$2,816,745	\$33,369	\$0	\$2,850,114
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$549,988	\$0	\$0	\$549,988
QQ - Imports and Exports of Fluorinated GHGs in Products	158	1	158	12,536	\$699,671	\$0	\$0	\$699,671
SS - SF6 Equipment Producers	10	1	10	434	\$22,006	\$0	\$120	\$22,127
<b>TOTAL</b>	<b>417</b>	<b>1</b>	<b>417</b>	<b>111,186</b>	<b>\$6,001,483</b>	<b>\$1,023,748</b>	<b>\$120</b>	<b>\$7,025,351</b>

##### Subsequent-Year Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$1,913,073	\$3,511,900	\$0	\$5,424,973
L - Fluorinated Gas Production	14	1	14	2,591	\$132,348	\$33,369	\$14,080	\$179,797
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$549,988	\$0	\$0	\$549,988
QQ - Imports and Exports of Fluorinated GHGs in Products	158	1	158	10,956	\$609,953	\$0	\$0	\$609,953
SS - SF6 Equipment Producers	10	1	10	434	\$22,006	\$0	\$120	\$22,127
<b>TOTAL</b>	<b>417</b>	<b>1</b>	<b>417</b>	<b>59,458</b>	<b>\$3,227,369</b>	<b>\$3,545,269</b>	<b>\$14,200</b>	<b>\$6,786,838</b>

##### Annual Average Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$1,913,073	\$2,671,393	\$0	\$4,584,466
L - Fluorinated Gas Production	14	1	14	19,307	\$1,027,147	\$33,369	\$9,387	\$1,069,903
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$549,988	\$0	\$0	\$549,988
QQ - Imports and Exports of Fluorinated GHGs in Products	158	1	158	11,482	\$639,859	\$0	\$0	\$639,859
SS - SF6 Equipment Producers	10	1	10	434	\$22,006	\$0	\$120	\$22,127
<b>TOTAL</b>	<b>417</b>	<b>Varies</b>	<b>417</b>	<b>76,702</b>	<b>\$4,152,073</b>	<b>\$2,704,762</b>	<b>\$9,507</b>	<b>\$6,866,343</b>

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).



### J3. Change in Burden and Cost for Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, and SS)

#### Revised Burden & Cost

##### First-Year Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$2,050,981	\$3,511,900	\$0	\$5,562,881
L - Fluorinated Gas Production	14	1	14	2,591	\$141,635	\$33,369	\$14,080	\$189,084
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$590,027	\$0	\$0	\$590,027
QQ - Imports and Exports of Fluorinated GHGs in Products	158	0	158	10,956	\$654,370	\$0	\$0	\$654,370
SS - SF6 Equipment Producers	10	0	10	434	\$23,615	\$0	\$120	\$23,736
<b>TOTAL</b>	<b>417</b>	<b>Varies</b>	<b>417</b>	<b>59,459</b>	<b>\$3,460,628</b>	<b>\$3,545,269</b>	<b>\$14,200</b>	<b>\$7,020,098</b>

##### Subsequent-Year Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$2,050,981	\$3,511,900	\$0	\$5,562,881
L - Fluorinated Gas Production	14	1	14	2,591	\$141,635	\$33,369	\$14,080	\$189,084
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$590,027	\$0	\$0	\$590,027
QQ - Imports and Exports of Fluorinated GHGs in Products	158	0	158	10,956	\$654,370	\$0	\$0	\$654,370
SS - SF6 Equipment Producers	10	0	10	434	\$23,615	\$0	\$120	\$23,736
<b>TOTAL</b>	<b>417</b>	<b>Varies</b>	<b>417</b>	<b>59,459</b>	<b>\$3,460,628</b>	<b>\$3,545,269</b>	<b>\$14,200</b>	<b>\$7,020,098</b>

##### Annual Average Burden & Cost (1)

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	94	1	94	34,937	\$2,050,981	\$3,511,900	\$0	\$5,562,881
L - Fluorinated Gas Production	14	1	14	2,591	\$141,635	\$33,369	\$14,080	\$189,084
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	141	1	141	10,540	\$590,027	\$0	\$0	\$590,027
QQ - Imports and Exports of Fluorinated GHGs in Products	158	0	158	10,956	\$654,370	\$0	\$0	\$654,370
SS - SF6 Equipment Producers	10	0	10	434	\$23,615	\$0	\$120	\$23,736
<b>TOTAL</b>	<b>417</b>	<b>Varies</b>	<b>417</b>	<b>59,459</b>	<b>\$3,460,628</b>	<b>\$3,545,269</b>	<b>\$14,200</b>	<b>\$7,020,098</b>

(1) Does not include the burden or cost for provision of information on parent companies, NAICS codes, and whether emissions are from cogeneration. This adds another 0.68 hours and \$44 per respondent (see Appendix L).

### J3. Change in Burden and Cost for Additional Sources of Fluorinated GHG (Subparts I, L, DD, QQ, and SS)

#### Change in Burden and Cost

Source Category	No. Respondents	Responses/ Respondent	Total Responses	Total Burden (hrs)	Total Labor Cost (\$K)	Capital Cost (\$K)	O&M Cost (\$K)	Total Cost (\$K)
I - Electronics Manufacturing	0	0	0	0	\$137,908	\$840,507	\$0	\$978,415
L - Fluorinated Gas Production	0	0	0	-16,716	-\$885,512	\$0	\$4,693	-\$880,819
DD - Sulfur Hexafluoride (SF6) from Electric Power Systems	0	0	0	0	\$40,039	\$0	\$0	\$40,039
QQ - Imports and Exports of Fluorinated GHGs in Products	0	-1	0	-527	\$14,511	\$0	\$0	\$14,511
SS - SF6 Equipment Producers	0	-1	0	0	\$1,609	\$0	\$0	\$1,609
<b>TOTAL</b>	<b>0</b>		<b>0</b>	<b>-17,242</b>	<b>-\$691,445</b>	<b>\$840,507</b>	<b>\$4,693</b>	<b>\$153,755</b>

#### Reason for Changes in Burden and Cost

- Adjusted the labor hours and labor cost per facility for subparts L and QQ to recognize the completion of the one-time activities that occurred in the first year of data collection.
- Updated the labor rates used to calculate labor costs, adopting an approach consistent with the approach used in the other subparts (see Appendix F).