

EPA ICR No. 1139.11; OMB Control No. 2070-0033

ATTACHMENT 3

Economic Analysis Tables

Table A: Burden and Cost, per Activity

Collection Activity	Per Activity Labor				Per-Activity Supply Costs (y)	Total per-Activity Costs (x+y)
	Type ^a	Hours	Rate	Cost (x)		
CDX REGISTRATION						
CDX Registration	T	0.180	\$72.22	\$13.00	\$0.00	\$13.00
CDX Electronic Signature	T	0.350	\$72.22	\$25.28	\$0.00	\$25.28
CDX Registration and e-Signature Total		0.530	\$144.44	\$38.28	\$0.00	\$38.28
TEST RULES AND TESTING AGREEMENT:						
Interim Reports						
Letter of Intent with Study Plans	T	40	\$72.22	\$2,888.80	\$0.00	\$2,888.80
Prepare Progress Report	T	8	\$72.22	\$577.76	\$0.00	\$577.76
Final Reports						
Short-term Studies						
Record and Prepare Test for Submission	T	40	\$72.22	\$2,888.80	\$0.00	\$2,888.80
Laboratory Review	T	6	\$72.22	\$433.32	\$0.00	\$433.32
Corporate Review	M	6	\$80.22	\$481.32	\$0.00	\$481.32
Recordkeeping	C	0.5	\$31.26	\$15.63	\$0.00	\$15.63
Short-term Studies' Final Reports Total		52.5		\$3,819.07	\$0.00	\$3,819.07
Long-term Studies						
Record and Prepare Test for Submission	T	80	\$72.22	\$5,777.60	\$0.00	\$5,777.60
Corporate Review	M	9	\$80.22	\$721.98	\$0.00	\$721.98
Recordkeeping	C	0.5	\$31.26	\$15.63	\$0.00	\$15.63
Long-term Studies' Final Reports Total		89.5		\$6,515.21	\$0.00	\$6,515.21
Robust Summaries	T	12	\$72.22	\$866.64	\$0.00	\$866.64
VOLUNTARY SUBMISSIONS:^b						
Robust Summaries	T	12	\$72.22	\$866.64	\$0.00	\$866.64
Submission of Final Reports	C	10	\$31.26	\$312.60	\$8.41	\$321.01
Recordkeeping	C	1	\$31.26	\$31.26	\$0.00	\$31.26
EXEMPTION APPLICATIONS:						
Prepare Exemption Applications	T	2	\$72.22	\$144.44	0.00	\$144.44
Corporate Review	M	6	\$80.22	\$481.32	0.00	\$481.32
Recordkeeping	C	0.5	\$31.26	\$15.63	\$0.00	\$15.63
Exemption Applications, Total		8.5		\$641.39	\$0.00	\$641.39

^a Labor Type Codes are as follows: T = Technical; M = Managerial; C = Clerical

^b Voluntary Submissions are the only type of TSCA Section 4 submission that not required to be submitted electronically. Paper and postage costs are estimated under "Per-Activity Supply Cost." These costs assumed that a voluntary submission contains: ten final reports averaging 35 pages, plus a cover letter and robust summary, totaling 362 pages. Paper costs at \$.0092 per page total \$3.30 (Staples 2015). Postage via 2 day FedEx Ground for the .4 lb package totals \$8.41 (FedEx 2015). Unit supply costs for "Robust Summaries" and "Recordkeeping" were removed from voluntary submissions (compared to the estimates in the last IC period) because the costs are accounted for under "Submission of Final Reports."

Table B: Industry Wage Rates (Dec 2014)

Labor Category	Wage (\$/hour) ¹	Fringe Benefits (\$/hour) ¹	Fringes as % Wage	Overhead % Wage ²	Fringe + Overhead Factor	Loaded Wages (\$/hour)
	(a)	(b)	(c) = (b)/(a)	(d)	(e)=(1)+(c)+(d)	(f) = (a) x (e)
Managerial	\$47.90	\$24.18	50%	17%	1.67	\$80.22
Technical	\$42.19	\$22.86	54%	17%	1.71	\$72.22
Clerical	\$18.68	\$9.40	50%	17%	1.67	\$31.26

Notes:
¹Source: Employer Costs for Employee Compensation Supplementary Tables: December 2006 – December 2014 (U.S. Bureau of Labor Statistics, 2015).
²An overhead rate of 17% is used based on assumptions in Wage Rates for Economic Analysis of the Toxics Release Inventory Program (Rice, 2002), and the Revised Economic Analysis for the Amended Inventory Update Rule: Final Report (US EPA, 2002).

Table C: Agency Wage Rate (Jan 2015)

Labor Category	Data Source for Wage Information	Wage (\$/hour)	Fringe Benefit	Fringes as % wage	Overhead as % wage	Fringe + Overhead Factor	Loaded Wage (\$)
		(a)	(b)	(c) = (b) / (a)	(d)	(e) = (c) + (d) + 1	(f) = (a) * (e)
EPA staff	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-13 Step 1 pay rates ^a	\$43.52	Included in 60% overhead	N/A	60% ^b	1.6	\$69.63

^a Source: U.S. Office of Personnel Management. (2014). Salary Table 2014-DCB. Retrieved March 19, 2015 from Pay & Leave: Salaries & Wages: www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/14Tables/html/DCB_h.aspx.
^bThe 60 percent fringes-and-overhead rate is from an EPA guide, *Instructions for Preparing ICRs* (US EPA, 2009).

Table D: Comparison of Burden: Previous ICR Versus Current e-Reporting, Per Activity

Collection Activity	Previous ICR			Post e-Reporting Rule		
	Per Activity Labor		Per-Activity Supply Costs (y)	Per Activity Labor		Per-Activity Supply Costs (y)
	Type ^a	Hours		Type ^a	Hours	
CDX REGISTRATION						
CDX Registration	N/A	N/A	N/A	T	0.18	\$0.00
CDX Electronic Signature	N/A	N/A	N/A	T	0.35	\$0.00
CDX Registration and e-Signature Total					0.53	\$0.00
TEST RULES AND TESTING AGREEMENTS:						
Interim Reports						
Letter of Intent with Study Plans	T	40	\$21.91	T	40	\$0.00
Prepare Progress Report	T	8	\$5.48	T	8	\$0.00
Final Reports						
Short-term Studies						
Record and Prepare Test for Submission	T	40	\$0.00	T	40	\$0.00
Laboratory Review	T	6	\$0.00	T	6	\$0.00
Corporate Review	M	6	\$0.00	M	6	\$0.00
Type and Print Results	C	20	\$0.00	N/A	0	\$0.00
Recordkeeping	C	1	\$5.48	C	0.5	\$0.00
Short-term Studies Total		73	\$5.48		52.5	\$0.00
Long-term Studies						
Record and Prepare Test for Submission	T	80	\$0.00	T	80	\$0.00
Corporate Review	M	9	\$0.00	M	9	\$0.00
Type and Print Results	C	40	\$0.00	N/A	0	\$0.00
Recordkeeping	C	1	\$5.48	C	0.5	\$0.00
Long-term Studies Total		130	\$5.48		89.5	\$0.00
Robust Summaries	T	12	\$0.00	T	12	\$0.00
VOLUNTARY SUBMISSIONS:						
Robust Summaries	T	12	\$0.00	T	12	\$0.00
Submission of Final Reports	C	10	\$0.00	C	10	\$8.41
Recordkeeping	C	1	\$5.48	C	1	\$0.00
EXEMPTION APPLICATIONS:						
Prepare Exemption Applications	T	2	0.00	T	2	0.00
Corporate Review	M	6	0.00	M	6	0.00
Recordkeeping	C	1	\$5.48	C	0.5	\$0.00
Exemption Application Total		9	\$5.48		8.5	\$0.00
^a Labor Type Codes are as follows: T = Technical; M = Managerial; C = Clerical						