

<b>Assumptions</b>	<b>Value</b>	<b>Source</b>
# Beneficial Users subject to criterion 4	472	Average from high and low estimate in EA
% Beneficial Users triggering location-based standards	5.85%	Average from high and low estimate in EA
# investigations required for each beneficial use demonstration for location-based standards	5	EA
# Beneficial Users required to read the regulations	1036	Average from high and low estimate in EA
# CCR Units required to revise corrective action and groundwater reports	764	EA
# owner/operators required to update publically accessible website	5	EA
# owner/operators required to revise corrective action and groundwater reports	300	EA
# CCR units per owner/operator	2.5	EA (# units / # facilities)

EXHIBIT CCR-1

DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES

ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - OWNERS AND OPERATORS OF CCR UNITS \*

	Hours and Costs Per Respondent Per Activity								Total Hours and Costs			Total Capital Cost/ Year
	Leg. \$125.14/ Hour	Mgr. \$105.75/ Hour	Tech. \$50.98/ Hour	Cler. \$29.90/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year	
<b>INFORMATION COLLECTION ACTIVITY</b>												
<b>Beneficial use of CCR</b>												
Location-Based Standard Investigation Costs (annual)	0.00	0.25	1.00	0.75	2.00	\$99.84	0.00	0.00	2,360	4,720.00	\$235,622.40	\$0.00
Criterion 4 Demonstration (annual)	2.00	2.00	35.00	1.00	40.00	\$2,275.98	0.00	0.00	28	1,104.48	\$62,844.36	\$0.00
Read the regulations (one-time)	0.00	0.50	0.50	0.00	1.00	\$78.37	0.00	0.00	345	345.34	\$27,063.77	\$0.00
<b>TOTAL</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>\$0.00</b>	<b>Varies</b>	<b>Varies</b>	<b>6,169.82</b>	<b>\$325,530.53</b>	<b>\$0.00</b>

\* Exhibit includes rounding error.

Total O&M Cost/ Year	Total Labor Costs/Year
\$0.00	\$235,622.40
\$0.00	\$62,844.36
\$0.00	\$27,063.77
<b>\$0.00</b>	<b>\$325,530.53</b>

Type of Activity
Reporting
Reporting
Reporting

Reporting			
Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year
0.00	0.00	\$0.00	\$0.00
27.61	1,104.48	\$0.00	\$0.00
345.33	345.34	\$0.00	\$0.00
<b>372.95</b>	<b>1,449.82</b>	<b>\$0.00</b>	<b>\$0.00</b>

Recordkeeping			
Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year
0.00	0.00	\$0.00	\$0.00
0.00	0.00	\$0.00	\$0.00
0.00	0.00	\$0.00	\$0.00
<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

Third Party Disclosure		
Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year
0.00	0.00	\$0.00
0.00	0.00	\$0.00
0.00	0.00	\$0.00
<b>0.00</b>	<b>0.00</b>	<b>\$0.00</b>

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**Total  
O&M Cost/  
Year**

\$0.00
\$0.00
\$0.00
\$0.00

EXHIBIT CCR-4  
DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - OWNERS AND OPERATORS OF CCR UNITS <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$125.14/ Hour	Mgr. \$105.75/ Hour	Tech. \$50.98/ Hour	Cler. \$29.90/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>										
<b>Groundwater Monitoring and Corrective Action</b>										
<b>Applicability (40 CFR 257.90)</b>										
Revisions to the Annual Groundwater Monitoring and Corrective Action Report Requirements ( <b>One-time</b> )	0.00	1.00	1.00	0.00	2.00	\$156.73	\$0.00	\$0.00	255	509.34
Revisions to the Annual Groundwater Monitoring and Corrective Action Report Requirements ( <b>Annual</b> )	0.00	0.50	1.00	0.00	1.50	\$103.86	\$0.00	\$0.00	764	1,146.00
<sup>a</sup> Exhibit includes rounding error.										
<b>TOTAL</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>\$0.00</b>	<b>Varies</b>	<b>Varies</b>	<b>1,655.34</b>

1 Costs

Total Cost/ Year
\$39,913.91
\$79,349.04
<b>\$119,262.95</b>

Total Capital Cost/ Year	Total O&M Cost/ Year	Total Labor Costs/Year
\$0.00	\$0.00	\$39,913.91
\$0.00	\$0.00	\$79,349.04
<b>\$0.00</b>	<b>\$0.00</b>	<b>\$119,262.95</b>

Type of Activity
Reporting
Reporting

Reporting				Record	
Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year	Number Responses/ Year	Total Hours/ Year
254.67	509.34	\$0.00	\$0.00	0.00	0.00
764.00	1,146.00	\$0.00	\$0.00	0.00	0.00
<b>1,018.67</b>	<b>1,655.34</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>



EXHIBIT CCR-6 (continued)  
DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES  
ESTIMATED ANNUAL RESPONDENT HOUR AND COST BURDEN - OWNERS AND OPERATORS OF CCR UNITS <sup>a</sup>

	Hours and Costs Per Respondent Per Activity								Total Hours and	
	Leg. \$125.14/ Hour	Mgr. \$105.75/ Hour	Tech. \$50.98/ Hour	Cler. \$29.90/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year
<b>INFORMATION COLLECTION ACTIVITY</b>										
<b>Recordkeeping, Notification, and Posting of Information to the Internet</b>										
<b>Publicly Accessible Internet Site Requirements (40 CFR 257.107)</b>										
<b>Develop Internet Site</b>										
Update Website ( <b>One-time</b> )	0.00	1.00	1.00	0.00	2.00	\$156.73	\$0.00	\$0.00	2	3.34

<sup>a</sup> Exhibit includes rounding error.



Costs

Total Cost/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year	Total Labor Costs/Year
\$261.22	\$0.00	\$0.00	\$261.22

Type of Activity
Reporting

Reporting

Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year
1.67	3.34	\$0.00	\$0.00

Recordl

Number Responses/ Year	Total Hours/ Year
0.00	0.00

keeping

Total Capital Cost/ Year	Total O&M Cost/ Year
\$0.00	\$0.00

Third Party Disclosure

Number Responses/ Year	Total Hours/ Year	Total Capital Cost/ Year	Total O&M Cost/ Year
0.00	0.00	\$0.00	\$0.00

**EXHIBIT X**  
**DISPOSAL OF COAL COMBUSTION RESIDUALS FROM ELECTRIC UTILITIES**  
**TOTAL ESTIMATED RESPONDENT HOUR AND COST BURDEN SUMMARY <sup>a</sup>**

	<b>Annual Burden Hours</b>
Beneficial Use (Exhibit 1)	6,170
Groundwater Monitoring and Corrective Action (Exhibit 4)	1,655
Recordkeeping, Notification, and Posting of Information to the Internet - Owners and Operators of CCR Units (Exhibit 6)	3
<b>Total</b>	<b>7,829</b>
<b>3-year Total</b>	<b>23,486</b>

<sup>a</sup> Exhibit includes rounding error.

Number of Annual Responses

3753

<b>Annual Labor Cost</b>	<b>Annual Capital/ Startup Cost</b>	<b>Annual O&amp;M Cost</b>	<b>Total Annual Cost</b>
\$325,531	\$0	\$0	\$325,531
\$119,263	\$0	\$0	\$119,263
\$261	\$0	\$0	\$261
<b>\$445,055</b>	<b>\$0</b>	<b>\$0</b>	<b>\$445,055</b>
<b>\$1,335,163</b>	<b>\$0</b>	<b>\$0</b>	<b>\$1,335,163</b>

### Owners and Operators of CCR Units

**(Note: changes here WILL be reflected in the column headings of the tables.)**

Labor Category	Occupation code	May 2017 Mean Hourly Rate <sup>a</sup>	Fringe Benefits Rate <sup>b</sup>	Overhead Rate <sup>c</sup>	Fringe/Overhead Multiplier	Employment Cost Index Adjustment to 2018 Levels <sup>d</sup>	2018 Loaded Rate
Legal	23-1011	\$68.22	33.3%	12%	1.78	1.028	\$125.14
Managerial	11-0000	\$57.65	33.3%	12%	1.78	1.028	\$105.75
Technical	17-3026	\$27.79	33.3%	12%	1.78	1.028	\$50.98
Clerical	43-9061	\$16.30	33.3%	12%	1.78	1.028	\$29.90

<sup>a</sup> Mean hourly rates from U.S. Bureau of Labor Statistics (BLS)'s May 2017 National Industry-Specific Occupational Employment and Wage Estimates cross all industry sectors, at: [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm).

<sup>b</sup> Applied "All goods-producing" industry group fringe benefits percentage of 33.3% from "Table 6. Private industry, by major industry group" of the US Bureau of Labor Statistics (BLS) "Employer Costs for Employee Compensation" (ECEC), June 2018 at <https://www.bls.gov/news.release/ecec.t06.htm>.

<sup>c</sup> In absence of data specific to industry, applied 12% Federal civilian overhead cost factor from Figure C1 of the REVISED February 2008 OMB Circular A-76 at [http://www.whitehouse.gov/omb/circulars\\_a076\\_a76\\_incl\\_tech\\_correction/](http://www.whitehouse.gov/omb/circulars_a076_a76_incl_tech_correction/).

<sup>d</sup> Bureau of Labor Statistics, "Table 4. Employment Cost Index for total compensation, for civilian workers, by occupational and industry," Employment Cost Index Historical Listing - Volume V, Continuous Occupational and Industry Series, September 1975 – June 2018; July 2018. Available online at: <https://www.bls.gov/web/eci/ecicois.pdf>, last accessed on October 29, 2018. Civilian Workers, All Workers, June 2017=129.7 and June 2018=133.3.

### State Government Agencies and Tribal Authorities

**(Note: changes here WILL be reflected in the column headings of the tables.)**

Labor Category	Occupation code	May 2017 Mean Hourly Rate <sup>a</sup>	Fringe Benefits Rate <sup>b</sup>	Overhead Rate <sup>c</sup>	Fringe/Overhead Multiplier <sup>d</sup>	Employment Cost Index Adjustment to 2018 Levels <sup>e</sup>	2018 Loaded Rate
Legal	23-1011	\$43.32	37.6%	12%	1.97	1.0230	\$87.25
Managerial	11-0000	\$42.17	37.6%	12%	1.97	1.0230	\$84.94
Technical	19-4091	\$22.45	37.6%	12%	1.97	1.0230	\$45.22
Clerical	43-9061	\$16.02	37.6%	12%	1.97	1.0230	\$32.27

<sup>a</sup> U.S. Bureau of Labor Statistics (BLS)'s May 2017 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 999200 – State Government (OES Designation), at: [http://www.bls.gov/oes/current/naics4\\_999200.htm#b17-0000](http://www.bls.gov/oes/current/naics4_999200.htm#b17-0000)

<sup>b</sup> Applied 37.6% fringe benefits percentage from "Table 3. State and local government, by major occupational and industry group" of the US Bureau of Labor Statistics (BLS) "Employer Costs for Employee Compensation" (ECEC), June 2018 at <https://www.bls.gov/news.release/ecec.t03.htm>.

<sup>c</sup> In absence of data specific to state governments, applied 12% Federal civilian overhead cost factor from Figure C1 of the REVISED February 2008 OMB Circular A-76 [http://www.whitehouse.gov/omb/circulars\\_a076\\_a76\\_incl\\_tech\\_correction/](http://www.whitehouse.gov/omb/circulars_a076_a76_incl_tech_correction/).

<sup>d</sup> Bureau of Labor Statistics, "Table 7. Employment Cost Index for total compensation, for State and local government workers, by occupational and industry," Employment Cost Index Historical Listing - Volume V, Continuous Occupational and Industry Series, September 1975 – June 2018; July 2018. Available online at: <https://www.bls.gov/web/eci/ecicois.pdf>, last accessed on October 29, 2018. State and local government workers, All workers, June 2017=132.0 and June 2018=135.1.

<b>Agency</b>				
<b>Labor Category</b>	<b>GS Code</b>	<b>January 2018 Base Rate <sup>a</sup></b>	<b>Overhead Rate</b>	<b>2018 Loaded Rate</b>
Legal	GS-15, Step 5	57.09	1.6	\$91.34
Managerial	GS-15, Step 1	50.37	1.6	\$80.59
Technical	GS-13, Step 1	36.24	1.6	\$57.98
Clerical	GS-06, Step 1	15.46	1.6	\$24.74

<sup>a</sup> Office of Policy and Management (OPM) 2018 General Schedule (Base) Hourly Rate Pay Table. Accessed October 30, 2018 at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>.

Item	Cost

<b>Data Source</b>



Item	2018 Cost
Generic cost for engineer certification	\$380.00
Development EAP - surface impoundment	\$1,119.00
Development/Amendment of Fugitive Dust Control Plan	\$5,593.00
Documentation on the design, installation, development, and decommissioning of any monitoring wells, piezometers and other measurement, sampling, and analytical devices	\$104,384.00
Development of sampling and analysis program	\$16,779.00

Report describing selected remedy	\$100,295.00
Closure and post-closure plan	\$13,938.00
Standard Envelope (4 1/8" x 9 1/2")	\$0.03
First Class Postage (1 ounce)	\$0.49
Certified Mail Service	\$3.35

### Data Source

Based on cost of \$340 in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$1,000 in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$1,000 in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$93,316 in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$15,000 in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$89,660 (90,000 -340) in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost of \$12,460 (12,800 -340) in RIA, 2011 dollars.

Bureau of Labor Statistics, "Historical Consumer Price Index for All Urban Consumers (CPI-U): U. S. city average, all items, by month." September 2018. Available online at: <https://www.bls.gov/cpi/tables/supplemental-files/historical-cpi-u-201809.pdf>, last accessed on October 26, 2018. All items, December 2011=225.672 and September 2018=252.439.

Based on cost from Staples' Web site: Standard Business Envelopes with Gummed Closure, 500/Box for \$15.99 ([http://www.staples.com/Staples-10-Standard-Business-Gummed-Envelopes-500-Box/product\\_187013](http://www.staples.com/Staples-10-Standard-Business-Gummed-Envelopes-500-Box/product_187013), last accessed on December 8, 2017)

U.S. Postal Service (<https://www.usps.com/business/prices.htm?>, last accessed on December 8, 2017)

U.S. Postal Service (<https://www.usps.com/ship/insurance-extra-services.htm>, last accessed on December 8, 2017)