

<b>Summary</b>			
<i>Type of Respondent</i>	<i>Total Responses per Year</i>	<i>Total Hours per Year</i>	<i>Total Cost per Year (Labor and Non-Labor)</i>
Obligated Parties	78	19	\$1,710

<b>TOTAL NUMBER of Respondents:</b>	<b>39</b>
<b>Non-Labor Costs* Only:</b>	<b>\$0</b>

**\*Non-Labor Costs include capital, O&M, and purchased services.**

**These costs are reflected in the "OMB Inventory."**

(The spreadsheet provides the total of non-labor and labor costs for transparency and better understanding of the program.)

Annual Respondent Burden and Cost by Type of Party												
Obligated Parties*												
Information Collection Activity		Hours and Cost				Total Hours and Cost					Forms & Notes	Non-Labor Only Portion of Column K (All Purchased Services )
Citation	Activity	Standard Industry Mix Hours/ Response	Clerical Only Hours/ Response	Purchased Services Hours/ Response	Total Cost/ Response (dollars)	Number of Respondents	Number of Responses per party/year	Total Number of Responses per Year	Total Hours/ Year	Total Cost/Year		
80.XXXX	Reporting: Preparation/submission of notification letter to EPA	0.33	0.00	0.00	30	13	1	13	4	395	CBP (Respondents represent a subset of small refineries. )	0
80.XXXX	Recordkeeping: retain notification letter sent to EPA	0.10	0.00	0.00	9	13	1	13	1	120	CBP (Respondents are a subset of small refineries.)	0
80.XXXX	Recordkeeping: retain methods and variables to calculate RIN retirements	0.25	0.00	0.00	23	13	4	52	13	1,196	CBP (Burden estimated as one hour per per year.)	
GRAND TOTAL						39		78	19	1,710		-

Notes to the Table:

\* We assume 13 total respondents, one response per respondent, all of which will come in the first year. (We annualized the burden by dividing the hours by 3.)

ALL DECIMALS ARE ROUNDED TO THE NEAREST WHOLE NUMBER.

<b>Labor Costs</b>				
<i>Labor Type</i>	<i>Labor Cost/hour</i>	<i>Labor + Overhead/hour<sup>a</sup></i>	<i>Portion attributed/hour</i>	<i>Employer Cost/hour</i>
Managerial (CEO - 11-1011)	126.33	253	0.05	12.65
Professional/Technical (Refinery Operators - 51-8093)	41.32	83	0.7	58.1
Clerical (Secretaries and Administrative Assistants 43-6010)	26.88	54	0.2	10.8
Legal (Lawyer 23-1011)	98.36	197	0.05	9.85
Total Employer Cost/hour				92
Purchased Services <sup>b</sup>				230

<sup>a</sup> Overhead is calculated to be equal to the cost of labor; i.e. 2x labor cost, rounded up.

<sup>b</sup> The cost of purchased services (for example, cost of attest auditors) is calculated at 2.5 times Employer Cost. Increased from 2 times (as a result of industry consultation/comment).

"May 2021 National Industry-Specific Occupational Employment and Wage Estimates for NAIC: US Bureau of Labor Statistics

See: [https://www.bls.gov/oes/current/naics3\\_324000.htm](https://www.bls.gov/oes/current/naics3_324000.htm) (accessed May 2, 2022).

For each labor category, mean hourly wage was selected.

the Total

S 324000 - Petroleum and Coal Products Manufacturing”