

**Appendix D:**  
**Greenhouse Gas Reporting Program:**  
**Labor Rates**

**November 2023**

## Appendix D-1. Respondent Labor Rates

Subpart (1)	ICR Labor Category	Labor Rates for the 2024 Renewal ICR				
		BLS Citation	Mean Hourly Wage & Salaries (2021\$)	Benefits Loading Factor (4)	Overhead Loading Factor (5)	Loaded Hourly Rates Used in ICRs (2021\$)(7)
All	Technical(2)	SOC 17-2112 (Industrial Engineer), top-level	45.77	0.443	0.17	\$73.83
	Managerial(2)	SOC 11-3051 (Industrial Production Manager), top-level	\$56.62	0.443	0.17	\$91.33
	Administrative Support (3)	Office and Administrative Support	\$20.85	0.465	0.17	\$34.09
	Legal(2)	SOC 23-1011 (Lawyer)	\$71.17	0.443	0.17	\$114.80
W and RR	Legal(2)	SOC 23-1011 (Lawyer)	\$71.17	0.443	0.17	\$114.80
	Middle Manager(6)	NAICS 211100 (Oil and Gas Extraction); SOC 11-1021 (General and Operations Managers)	\$76.54	0.443	0.17	\$123.46
	Senior Manager(6)	NAICS 211100 (Oil and Gas Extraction); SOC 11-3051 (Industrial Production managers)	\$82.03	0.443	0.17	\$132.31
	Engineers(6)	NAICS 211100 (Oil and Gas Extraction); SOC 17-2112 (Industrial Engineers)	\$68.30	0.443	0.17	\$110.17
	Technicians(6)	NAICS 211100 (Oil and Gas Extraction); SOC 17-3024 (Electro-Mechanical and Mechatronics Technologists and Technicians)	\$48.35	0.443	0.17	\$77.99

- (1) Technical, Managerial, Administrative Support, and Legal are used for all subparts. In addition to these rates, specialized rates are used for subparts W and RR.
- (2) The base hourly wages & salaries (not including benefits & overhead) for all categories except administrative support are from: [Bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm). U.S. Bureau of Labor Statistics (BLS) – Occupational Employment and Wage Statistics - May 2021 National Occupational Employment and Wage Estimates – United States. 17-0000 Architecture and Engineering Occupations. Wages found under Major Occupation Group 17-0000 Architecture and Engineering Occupations.
- (3) The base hourly wages & salaries (not including benefits & overhead) for administrative support are from <https://www.bls.gov/web/ecec/ececqrtn.pdf>. BLS’s “Employer Costs for Employee Compensation – Historical Listing – National Compensation Survey – March 2004 – September 2021, page 668: Table 19. Private Industry workers, full-time by occupational group: employer costs per hour worked for employee compensation and costs as a percentage of total compensation – Continued – Office and administrative support occupations – wages and salaries – 2021, “Cost per hour worked” column – September 2021.
- (4) The benefits loading factor is calculated using data from: <https://www.bls.gov/web/ecec/ececqrtn.pdf>. BLS's Employer Costs for Employee Compensation – Historical Listing – National Compensation Survey – March 2004 – September 2021, page 653: Table 19. Private Industry

workers, full-time by occupational group: employer costs per hour worked for employee compensation and costs as a percentage of total compensation - Continued - Management, professional, and related occupations - "Cost per hour worked" column. To calculate the benefits loading factor for Technical, Managerial, Legal, Middle Manager, Senior Manager, Engineers, and Technicians, we used the ratio of "Total benefits" (20.28) and "wages and salaries" (45.81) for September 2021:  $20.28/45.81 = 0.4426$ , rounded to 0.443. To calculate the benefits loading factor for Administrative Support, we used "Office and administrative support occupations", page 668 - Table 19. Private Industry workers, full-time by occupational group: employer costs per hour worked for employee compensation and costs as a percentage of total compensation - Continued - Office and administrative support occupations. Total benefits, 2021 (9.70), and Wages and salaries (20.85).  $9.70/20.85 = 0.4652$ , rounded to 0.465.

- (5) The overhead loading factor of 17 % (0.17) is from EPA-HQ-OPPT-2010-0572-0061\_content.pdf: Rice, Cody 2002. "Wage Rates for Economic Analyses of the Toxics Release Inventory Program," Analytical Support Branch, Environmental Analysis Division, Office of Environmental Information, U.S. EPA, April 11, 2002, page 3.
- (6) The mean hourly wage and salaries for middle manager, senior manager, engineer, and technician, for subparts W and RR, are from [https://www.bls.gov/oes/current/naics4\\_211100.htm](https://www.bls.gov/oes/current/naics4_211100.htm): U.S. Bureau of Labor Statistics - Occupational Employment and Wage Statistics - May 2021 National Industry-Specific Occupational Employment and Wage Estimates - NAICS 211100 - Oil and Gas Extraction.
- (7) The loaded hourly rate = Wages & Salaries + (Wages & Salaries \* Benefits Loading Factor) + (Wages & Salaries \* Overhead Loading Factor).

## Appendix D-2. EPA Labor Rates

ICR Labor Category	Labor Rates for the 2024 Renewal ICR			
	OPM Designation	Wages & Salaries (2021\$) (1)	Benefits Loading Factor (2)	Loaded Hourly Rates Used in ICRs (2021\$)
Technical	GS-12, Step 5	\$36.29	0.600	\$58.06
Managerial	GS-13, Step 1	\$38.08	0.600	\$60.93
Clerical	GS-6, Step 3	\$17.73	0.600	\$28.37

- (1) These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. See [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf).
- (2) The rates have been increased by 60% (benefits loading factor = 0.6) to account for the benefit packages available to government employees.