

Subpart	Annual Average for use in Exhibit 6.1 of Supporting Statement											Change from previous renewal							
	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 (\$)	2019 Renewal annual average cost	difference	% difference	cost diff per facility	explanation for overall change in costs	need subpart-specific explanation?	subpart-specific explanation for change in costs
C. Stationary Combustion (C only)	1,793	111	199,023	69,798	2,690	2,690	0	75,177	\$ 5,490,481	\$ -	\$ 1,892,086	\$ 7,382,567	\$8,408,203	\$ (1,025,636)	12.20%	\$ 572.02	different labor rates; facility counts based on actual number of facilities that reported to e-GGRT for each compliance option	No	
C-plus at least one other subpart - all tiers	3,519	111	390,609	142,387	5,279	5,279	0	152,944	\$ 11,170,107	\$ -	\$ 3,383,470	\$ 14,553,577	\$16,059,501	\$ (1,505,924)	9.38%	\$ 427.94		No	
D. Electricity Generation	1,096	61	66,856	3,288	877	877	0	5,042	\$ 352,721	\$ -	\$ 60,280	\$ 413,001	\$401,434	\$ 11,567	2.88%	\$ 10.55		No	
E. Adipic Acid Prod.	2	31	62	33	5	4	2	44	\$ 3,270	\$ -	\$ 6,118	\$ 9,388	\$8,712	\$ 676	7.76%	\$ 337.92		No	
F. Aluminum Production	7	23	161	379	47	13	7	446	\$ 33,536	\$ -	\$ 4,471	\$ 38,007	\$36,511	\$ 1,496	4.10%	\$ 213.69		No	
G. Ammonia Manufacturing	29	134	3,886	1,030	103	73	29	1,235	\$ 91,292	\$ -	\$ 143,035	\$ 234,327	\$274,366	\$ (40,039)	14.59%	\$ 1,380.64		No	
H. Cement Production	92	112	10,304	1,656	230	322	23	2,231	\$ 156,886	\$ -	\$ 5,060	\$ 161,946	\$160,718	\$ 1,228	0.76%	\$ 13.35		No	
I. Electronics Manufacturing	51	379	19,329	10,655	890	554	61	12,160	\$ 893,876	\$ -	\$ 288,776	\$ 1,182,652	\$1,160,407	\$ 22,245	1.92%	\$436.18		No	
K. Ferroalloy Production	8	179	1,432	256	26	19	16	316	\$ 23,716	\$ -	\$ 440	\$ 24,156	\$29,260	\$ (5,104)	17.44%	\$ 637.97		No	
L. Fluorinated Greenhouse Gas Prod	14	363	5,082	10,048	670	991	45	11,754	\$ 842,032	\$ -	\$ 770	\$ 842,802	\$818,291	\$ 24,511	3.00%	\$ 1,750.82		No	
N. Glass Production	101	60	6,060	3,949	483	321	99	4,851	\$ 357,928	\$ -	\$ 11,385	\$ 369,313	\$364,927	\$ 4,386	1.20%	\$ 43.42		No	
O. HCFC-22 Production and HFC-23 Destruction	4	32	128	384	26	38	8	456	\$ 32,939	\$ -	\$ 220	\$ 33,159	\$32,187	\$ 972	3.02%	\$ 243.03		No	
P. Hydrogen Production	111	137	15,207	3,761	376	376	92	4,606	\$ 335,441	\$ -	\$ 47,998	\$ 383,439	\$382,171	\$ 1,268	0.33%	\$ 11.43		No	
Q. Iron and Steel Production	122	61	7,442	2,191	329	256	162	2,938	\$ 219,123	\$ -	\$ 128,260	\$ 347,383	\$328,876	\$ 18,507	5.63%	\$ 151.70		No	
R. Lead Production	11	79	869	198	30	23	22	273	\$ 20,644	\$ -	\$ 12,760	\$ 33,404	\$31,601	\$ 1,803	5.71%	\$ 163.90		No	
S. Lime Manufacturing	68	268	18,224	1,468	147	128	128	1,870	\$ 140,834	\$ -	\$ 3,740	\$ 144,574	\$154,074	\$ (9,500)	6.17%	\$ 139.71		No	
T. Magnesium Production	10	83	830	120	28	23	10	181	\$ 13,332	\$ -	\$ 550	\$ 13,882	\$14,937	\$ (1,055)	7.06%	\$ 105.51		No	
J. Misc. Uses of Carbonate	5	7	35	30	8	8	0	45	\$ 3,156	\$ -	\$ 275	\$ 3,431	\$4,650	\$ (1,219)	26.22%	\$ 243.89	The number of reporters dropped from 7 in 2019 to 5 in 2021, a 28 % decrease. Thus the total cost of reporting per facility dropped from \$4,650 to \$3,431, a 26.22% decrease.	Yes	
V. Nitric Acid Production	31	23	713	873	115	80	31	1,099	\$ 81,235	\$ -	\$ 265,306	\$ 346,541	\$340,231	\$ 6,310	1.85%	\$ 203.54		No	
W. Oil and Natural Gas Systems	2,338	3,294	7,701,372	240,991	27,986	0	0	273,653	\$ 30,223,171	\$ -	\$ 24,410,343	\$ 54,633,514	\$45,212,423	\$ 9,421,091	20.84%	\$ 4,029.55	The total cost of labor increased from \$25,051,135 (2019-2021-3 year average) to \$30,223,171 in 2021, a 20.6%. Also, O&M costs increased from \$20,161,288 (2019-2021-3 year average) to \$24,410,343 in 2021. The number of reporters also increased from 2,202 in 2019 to 2,338 in 2021. This increase contributed to a cost difference of 9,421,091 between both years. Thus, 9,421,091/2,338 = 4,029.55.	Yes	
X. Petrochemical Prod.	85	672	57,120	10,892	639	995	170	12,696	\$ 915,952	\$ -	\$ 148,847	\$ 1,064,799	\$1,021,361	\$ 43,438	4.25%	\$ 511.03		No	
Y. Petroleum Refineries	134	173	23,182	5,995	600	600	268	7,463	\$ 548,630	\$ -	\$ 7,370	\$ 556,000	\$583,093	\$ (27,093)	4.65%	\$ 202.19		No	
Z. Phosphoric Acid Prod	9	100	900	54	14	14	9	90	\$ 6,713	\$ -	\$ 495	\$ 7,208	\$8,542	\$ (1,334)	15.61%	\$ 148.20		No	
AA. Pulp & Paper Mnfctng	103	105	10,815	2,338	371	165	52	2,925	\$ 218,017	\$ -	\$ 27,501	\$ 245,518	\$245,340	\$ 178	0.07%	\$ 1.73		No	
BB. Silicon Carbide Production	1	10	10	9	3	4	0	15	\$ 1,041	\$ -	\$ 253	\$ 1,294	\$1,246	\$ 48	3.84%	\$ 47.81		No	
CC. Soda Ash Manufacturing	4	28	112	24	7	6	0	37	\$ 2,577	\$ -	\$ 2,228	\$ 4,805	\$4,526	\$ 279	6.18%	\$ 69.87		No	
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	90	206	18,540	2,790	405	495	90	3,780	\$ 270,181	\$ -	\$ 124,290	\$ 394,471	\$346,130	\$ 48,341	13.97%	\$ 537.12		No	
EE. Titanium Dioxide Production	6	76	456	54	15	21	2	92	\$ 6,245	\$ -	\$ 2,706	\$ 8,951	\$8,550	\$ 401	4.69%	\$ 66.81		No	
FF. Underground Coal Mines	78	1,614	125,892	4,990	240	180	0	5,410	\$ 396,467	\$ -	\$ 66,285	\$ 462,752	\$347,475	\$ 115,277	33.18%	\$ 1,477.91	Facilities that reported Degas Emissions Calculations increased from 6 in 2019 to 19 in 2021, which contributed to an increase in the total cost of reporting, and also because reporting costs for Degas emissions are much more expensive than reporting costs for ventilation emissions. Facilities that reported ventilation emission calculations decreased from 78 in 2019 to 60 in 2021. The cost of O&M costs for reporting Degas emissions, increased from \$3,000 per facility in 2019 (in 2017 dollars), to \$3,315 in 2021 (10.5% increase as per inflation increases between 2017 and 2021). On the other hand, O&M costs for reporting ventilation emissions increased from \$50.00 in 2019 (in 2017 dollars) to \$55.00 in 2021 (10.5% increase, rounded).	Yes	
2GG. Zinc Production	5	44	220	120	17	12	10	159	\$ 11,924	\$ -	\$ 7,735	\$ 19,659	\$18,575	\$ 1,084	5.83%	\$ 216.73		No	
2HH. Landfills	1,127	514	579,278	58,807	5,635	6,762	1,127	72,331	\$ 5,216,262	\$ -	\$ 1,987,691	\$ 7,203,953	\$7,067,858	\$ 136,095	1.93%	\$ 120.76		No	
2II. Wastewater	114	437	49,818	2,850	422	194	114	3,580	\$ 268,632	\$ -	\$ 154,698	\$ 423,330	\$492,667	\$ (69,337)	14.07%	\$ 608.22		No	

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1											
	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 (\$)
Composting Subpart C only	1,793.00	111.00	199,023.00	69,797.70	2,689.50	2,689.50	0.00	75,176.70	\$5,490,481.28	\$ -	\$1,892,086.00	\$7,382,567.28

Table 46a. Labor Costs: Subpart C Only - General Facility Costs

Activity	Labor Rates (per hour)										Labor Cost per Year per Facility
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support				
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
	\$114.80		\$91.33		\$73.83		\$34.09				
Planning	0	0	0	0	7	7	0	0	\$517	\$517	
QA/QC	0	0	1	1	0	0	0	0	\$91	\$91	
Recordkeeping	0	0	0.5	0.5	5	5	0.5	0.5	\$432	\$432	
Sampling and Analysis (Calculations)	0	0	0	0	0	0	0	0	\$0	\$0	
Reporting	0	0	0	0	10	10	1	1	\$772	\$772	
Total	0	0	1.5	1.5	22	22	1.5	1.5	\$1,812	\$1,812	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

Table 46b. Labor Costs: Subpart C Only - Tier 1 Reporters

Labor Rates (per hour)

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Activity	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support		Labor Cost per Year per Facility	
	\$114.80		\$91.33		\$73.83		\$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	-	-	-	-	-	-	-	-	-	-
QA/QC Recordkeeping	-	-	-	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	7.2	7.2	0	0	\$533	\$533
Reporting	-	-	-	-	-	-	-	-	-	-
Total	0	0	0	0	7.2	7.2	0	0	\$533	\$533

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Table 46c. Labor Costs: Subpart C Only - Tier 2 Reporters

Activity	Labor Rates (per hour)		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support		Labor Cost per Year per Facility	
	\$114.80		\$91.33		\$73.83		\$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	-	-	-	-	-	-	-	-	-	-
QA/Q Recordkeeping	-	-	-	-	-	-	-	-	-	-

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Sampling and Analysis (Calculations)	0	0	0	0	25.4	25.4	0	0	\$1,876	\$1,876
Reporting	-	-	-	-	-	-	-	-	-	-
Total	0	0	0	0	25.4	25.4	0	0	\$1,876	\$1,876

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Table 46d. Labor Costs: Subpart C Only - Tier 3 Reporters

Activity	Labor Rates (per hour)								Labor Cost per Year per Facility	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support			
	114.8		91.3		73.8		34.1			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
Planning	-	-	-	-	-	-	-	-	-	-
QA/Q	-	-	-	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	28.9	28.9	0	0	\$2,131	\$2,131
Reporting	-	-	-	-	-	-	-	-	-	-
Total	0	0	0	0	28.9	28.9	0	0	\$2,131	\$2,131

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Table 46e. Labor Costs: Subpart C Only - Tier 4 Reporters

Activity	Labor Rates (per hour)								Labor Cost per Year per Facility	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
		\$114.80		\$91.30		\$73.80		\$34.10		
Planning	-	-	-	-	-	-	-	-	-	-
QA/Q Recordkeeping	-	-	-	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	-	0	0	0	0	80	80	0	0	\$5,906
Reporting	-	-	-	-	-	-	-	-	-	-
Total		0	0	0	0	80	80	0	0	\$5,906

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Table 46f. Labor Costs: Subpart C Only - Alternative Part 75 Reporters

Activity	Labor Rates (per hour)								Labor Cost per Year per Facility	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
		114.8		91.3		73.8		34.1		
Planning	-	-	-	-	-	-	-	-	-	-
QA/Q	-	-	-	-	-	-	-	-	-	-

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Recordkeeping	-	-	-	-	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	1	1	0	0	\$73	\$73	
Reporting	-	-	-	-	-	-	-	-	-	-	
Total	0	0	0	0	1	1	0	0	\$73	\$73	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
1,793.00	111.00	199,023.00	69,797.70	2,689.50	2,689.50	0.00	75,176.70	\$5,490,481.28	\$ -	\$1,892,086.00	\$7,382,567.28

Table 47a. Capital and O&M Costs: Subpart C Only - General Facility Costs

Activity	Cost Categories				Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$622	\$622	\$622
Recordkeeping	\$0	0	\$0	\$55	\$55	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$677	\$677	\$677

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

existing facilities		new facilities
1,793	2021	0
1,793	2022	0
1,793	2023	0

Table 47b. Capital and O&M Costs: Subpart C Only - Tier 1 Reporters

Cost Categories	Cost (2021\$)
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		Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
existing facilities	new facilities	Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
		Performance testing	-	-	-	-	-	-
		Recordkeeping	-	-	-	-	-	-
		Travel	-	-	-	-	-	-
		Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
		Total	\$0		\$0	\$0	\$0	\$0

1425 2021
1425 2022

1425 2023

0
0

0

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Table 47c. Capital and O&M Costs: Subpart C Only - Tier 2 Reporters

		Activity	Cost Categories			Total Reporting per Facility Cost (2021\$)		
			Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
existing facilities	new facilities	Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
		Performance testing	-	-	-	-	-	-
		Recordkeeping	-	-	-	-	-	-
		Travel	-	-	-	-	-	-
		Sampling Costs	\$0	0	\$0	\$1,041	\$1,041	\$1,041

545

2021

0

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545 2022 0
545 2023 0

Total	\$0	\$0	\$1,041	\$1,041	\$1,041
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Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5%. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Table 47d. Capital and O&M Costs: Subpart C Only - Tier 3 Reporters

existing facilities
63 2021 0
63 2022 0
63 2023 0

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$2,010	\$2,010	\$0
Performance testing	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-
Travel	-	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$1,760	\$1,760	\$1,760
Total	\$0		\$0	\$3,770	\$3,770	\$1,760

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Table 47e. Capital and O&M Costs: Subpart C Only - Tier 4 Reporters (New Reporters Only)

Activity	Cost Categories				Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$269,690	10	\$38,398	\$0	\$38,398	\$38,398
Performance testing	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-
Travel	-	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$269,690		\$38,398	\$0	\$38,398	\$38,398

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

existing facilities		new facilities
55	2021	0
55	2022	0
55	2023	0

Table 47f. Capital and O&M Costs: Subpart C Only - Alternative Part 75 Reporters

Activity	Cost Categories				Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-
Travel	-	-	-	-	-	-

existing facilities		new facilities
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28	2021	0	Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
28	2022	0	Total	\$0		\$0	\$0	\$0	\$0
28	2023	0							

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
1,793.00	111.00	199,023.00	69,797.70	2,689.50	2,689.50	0.00	75,176.70	\$5,490,481.28	\$ -	\$1,892,086.00	\$7,382,567.28	1,793.00	111.00	199,023.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average								
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 (\$)
69,797.70	2,689.50	2,689.50	0.00	75,176.70	\$5,490,481.28	\$ -	\$1,892,086.00	\$7,382,567.28

Total for 3 year period

\$ 22,147,702

Source Category	Year 1							
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)
Subpart C plus another subpart	3,519.00	111.00	390,609.00	142,387.30	5,278.50	5,278.50	0.00	152,944.30

Table 46a. Labor Costs: Subpart C Plus - General Factors

Activity	Labor Rates (per hour)							
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	0	0	0	5	5	0	0
QA/Qc	0	0	1	1	0	0	0	0
Recordkeeping	0	0	0.5	0.5	5	5	0.5	0.5
Sampling and Analysis (Calculations)	0	0	0	0	0	0	0	0
Reporting	0	0	0	0	10	10	1	1
Total	0	0	1.5	1.5	20	20	1.5	1.5

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting are as follows:

Table 46b. Labor Costs: Subpart C Plus - Tier 1 Respondents

Activity	Labor Rates (per hour)			
	Lawyer	Industrial Manager	Industrial Engineer/Technician	Administrative
	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	0	0	0
QA/AC	0	0	0	0
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	0	0	0

	114.8		91.3		73.8		
Activity	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
Planning	-	-	-	-	-	-	-
QA/Qc	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	6.8	6.8	0
Reporting	-	-	-	-	-	-	-
Total	0	0	0	0	6.8	6.8	0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), a

Table 46c. Labor Costs: Subpart C Plus - Tier 2 Re

Labor Rates (per hour)							
	114.8		91.3		73.8		
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative
Activity	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
Planning	-	-	-	-	-	-	-
QA/Qc	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	21	21	0
Reporting	-	-	-	-	-	-	-
Total	0	0	0	0	21	21	0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), a

Table 46d. Labor Costs: Subpart C Plus - Tier 3 Re

Activity	Labor Rates (per hour)						
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
	114.8		91.3		73.8		
Planning	-	-	-	-	-	-	-
QA/Qc	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	68.5	68.5	0
Reporting	-	-	-	-	-	-	-
Total	0	0	0	0	68.5	68.5	0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting

Table 46e. Labor Costs: Subpart C Plus - Tier 4 Re

Activity	Labor Rates (per hour)						
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
	114.8		91.3		73.8		
Planning	-	-	-	-	-	-	-
QA/Qc	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)	0	0	0	0	80	80	0
Reporting	-	-	-	-	-	-	-
Total	0	0	0	0	80	80	0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
 Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting

Table 46f. Labor Costs: Subpart C Plus - Alternative Part

Activity	Labor Rates (per hour)						
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
		114.8		91.3		73.8	
Planning	-	-	-	-	-	-	-
QA/Qc	-	-	-	-	-	-	-
Recordkeeping	-	-	-	-	-	-	-
Sampling and Analysis (Calculations)		0		0		0.7	
Reporting	-	-	-	-	-	-	-
Total		0		0		0.7	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
 Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting

34.1 Labor Cost per Year per Facility		
Subseq. Year	Initial Year	Subseq. Year
-	-	-
-	-	-
-	-	-
0	\$500	\$500
-	-	-
0	\$500	\$500

existing facilities	new facilities	
1959	2021	0
1,959	2022	0
1959	2023	0

and reporting, are based on 2019 ICR

Reporters

34.1 Labor Cost per Year per Facility		
Subseq. Year	Initial Year	Subseq. Year
-	-	-
-	-	-
-	-	-
0	\$1,550	\$1,550
-	-	-
0	\$1,550	\$1,550

existing facilities	new facilities	
1902	2021	0
1902	2022	0
1902	2023	0

and reporting, are based on 2019 ICR

Reporters

Per Support		
	Labor Cost per Year per Facility	
	34.1	
Subseq. Year	Initial Year	Subseq. Year
-	-	-
-	-	-
-	-	-
0	\$5,057	\$5,057
-	-	-
0	\$5,057	\$5,057

existing facilities		new facilities	
	208	2021	0
	208	2022	0
	208	2023	0

and reporting, are based on 2019 ICR

Reporters

Per Support		
	Labor Cost per Year per Facility	
	34.1	
Subseq. Year	Initial Year	Subseq. Year
-	-	-
-	-	-
-	-	-
0	\$5,906	\$5,906
-	-	-
0	\$5,906	\$5,906

existing facilities		new facilities	
	56	2021	0
	56	2022	0
	56	2023	0

and reporting, are based on 2019 ICR

t 75 Reporters

re Support		
34.1	Labor Cost per Year per Facility	
Subseq. Year	Initial Year	Subseq. Year
-	-	-
-	-	-
-	-	-
0	\$52	\$52
-	-	-
0	\$52	\$52

existing facilities		new facilities	
	23	2021	0
	23	2022	0
	23	2023	0

and reporting, are based on 2019 ICR

Year 2						
Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)
142,387.30	5,278.50	5,278.50	0.00	152,944.30	\$11,170,106.64	\$ -

Table 47a. Capital and O&M Costs: Subpart C Plus - General Facility Costs

Activity	Cost Categories				Total Repor Facility Cos
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (201\$/year)	Initial Year
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$209	\$209
Recordkeeping	\$0	0	\$0	\$55	\$55
Travel	\$0	0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0
Total	\$0		\$0	\$264	\$264

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please see 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Table 47b. Capital and O&M Costs: Subpart C Plus - Tier 1 Reporters

Activity	Cost Categories				Total Rep Facility Co
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0
Performance testing	-	-	-	-	-
Recordkeeping	-	-	-	-	-
Travel	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$0	\$0
Total	\$0		\$0	\$0	\$0

"Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 201 increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please see 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

"

Table 47c. Capital and O&M Costs: Subpart C Plus - Tier 2 Reporters

Activity	Cost Categories				Total Repor Facility Cos
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0
Performance testing	-	-	-	-	-
Recordkeeping	-	-	-	-	-
Travel	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$1,125	\$1,125
Total	\$0		\$0	\$1,125	\$1,125

"Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 201 increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please see 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

"

Table 47d. Capital and O&M Costs: Subpart C Plus - Tier 3 Reporters

Activity	Cost Categories				Total Repor Facility Cos
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year
Equipment (selection, purchase, installation)	\$0	0	\$0	\$12,957	\$12,957
Performance testing	-	-	-	-	-
Recordkeeping	-	-	-	-	-
Travel	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$1,513	\$1,513
Total	\$0		\$0	\$14,470	\$14,470

"Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR. Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00C 2017 Average CPI = 245.120; 2021 Average CPI = 270.970 270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Table 47e. Capital and O&M Costs: Subpart C Plus - Tier 4 Reporters (New Reporter

Activity	Cost Categories				Total Repor Facility Cos
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year
Equipment (selection, purchase, installation)	\$241,416	10	\$34,372	\$0	\$34,372
Performance testing	-	-	-	-	-
Recordkeeping	-	-	-	-	-
Travel	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$0	\$0
Total	\$241,416		\$34,372	\$0	\$34,372

"Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR. Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00C
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Table 47f. Capital and O&M Costs: Subpart C Plus - Alternative Part 75 Reporte

Activity	Cost Categories				Total Rep Facility Co
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0
Performance testing	-	-	-	-	-
Recordkeeping	-	-	-	-	-
Travel	-	-	-	-	-
Sampling Costs	\$0	0	\$0	\$0	\$0
Total	\$0		\$0	\$0	\$0

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) we
 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00C
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

		Year 3						
O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
\$3,383,470.00	\$14,553,576.64	3,519.00	111.00	390,609.00	142,387.30	5,278.50	5,278.50	0.00

\$21,936,144

<p>ting per t (2021\$)</p>
<p>Subseq. Years</p>
<p>\$0</p>
<p>\$209 \$55</p>
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Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)
152,944.30	\$11,170,106.64	\$ -	\$3,383,470.00	\$14,553,576.64	3,519.00	111.00	390,609.00	142,387.30

\$21,936,144

Annual Average							
Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
5,278.50	5,278.50	0.00	152,944.30	\$11,170,106.64	\$ -	\$3,383,470.00	\$14,553,576.64

\$21,936,144

Total for 3 year period

\$ 43,660,730

\$ 65,808,432

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
D. Electricity Generation	1,096.00	61.00	66,856.00	3,288.00	876.80	876.80	0.00	5,041.60	\$352,721.30	\$ -	\$60,280.00

Table 46. Labor Costs: Subpart D

Activity	Labor Rates (per hour)									
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		Labor Cost per Year per Reporting Unit/Facility	
	Year	Subseq. Year	Initial Year	Subseq. Year	Year	Subseq. Year	Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	0	0	0	0	0	0	0	\$0	\$0
QA/QC	0	0	0	0	0	0	0	0	\$0	\$0
Recordkeeping	0	0	0	0.3	0	1	0	0.3	\$0	\$105
Sampling and Analysis (Calculations)	0	0	0	0	0	0	0	0	\$0	\$0
Reporting	0	0	0	0.5	0	2	0	0.5	\$0	\$210
Total	0	0	0	0.8	0	3	0	0.8	\$0	\$316

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart D

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

existing facilities

1096

2021

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

1096

2022

1096

2023

****Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$413,001.30

existing facilities

\$1,096

\$1,096

1096

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)			
1,096.00	61.00	66,856.00	3,288.00	876.80	876.80	0.00	5,041.60	\$352,721.30	\$ -	\$60,280.00	\$413,001.30	1,096.00	61.00	66,856.00

new faciilites

2021	0
2022	0
2023	0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
3,288.00	876.80	876.80	0.00	5,041.60	\$352,721.30	\$ -	\$60,280.00	\$413,001.30	1,096.00	61.00	66,856.00	3,288.00	876.80	876.80	0.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
5,041.60	\$352,721.30	\$ -	\$60,280.00	\$413,001.30

Total for 3 year period
 \$ 1,239,004

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
E. Adipic Acid Production	2.00	31.00	62.00	33.00	5.10	4.05	2.00	44.15	\$3,269.84	\$ -	\$6,118.00

Table 46a. Labor Costs: Subpart E (alternative monitoring method option)

Activity	Labor Rates (per hour)								Labor Cost per Year per Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	1	0	0.2	0	2	0	0.1	\$0	\$284
QA/QC	0	0	0	0.5	0	5	0	0.25	\$0	\$423
Recordkeeping	0	0	0	0.5	0	2	0	0.5	\$0	\$210
Sampling and Analysis (Calculations)	0	0	0	0.1	0	1	0	0.05	\$0	\$85
Reporting	0	0	0	1	0	4	0	1	\$0	\$421
Total	0	1	0	2.3	0	14	0	1.9	\$0	\$1,423

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

existing facilities

Table 47a. Capital and O&M Costs: Subpart E (alternative monitoring method option)

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

Table 47b. Capital and O&M Co

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation)	\$0	\$0	\$0	\$0	\$0
Performance testing	\$0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR. Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0 2017 Average CPI = 245.120; 2021 Average CPI = 270.970 270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. Source of inflation values: data/bls.gov/cgi-bin/survey U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0 2017 Average CPI = 245.120; 2021 Average CPI = 270.970 270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
\$9,387.84	2.00	31.00	62.00	33.00	5.10

existing facilities

Table 46b. 1

		2021	Activity	Lawyer \$114.80	
				Initial Year	Subseq. Year
1			Planning	0	1
1		2022	QA/QC	0	0
1		2023	Recordkeeping	0	0
			Sampling and Analysis (Calculations)	0	0
			Reporting	0	0
			Total	0	1

Labor rates are obtained from appen

Estimated hours for planning, QA/AC

Costs: Subpart E (annual performance test option) existing facilities

		Total Reporting per Facility Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
			1

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$0	\$0	\$0	\$0
\$0	\$6,008	\$0	\$6,008
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$6,063	\$0	\$6,063

Between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values)
 For explanation of methodologies used to determine costs, please refer to the

cost?bls
 CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 70
 Between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2							Year 3									
Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	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 (\$)
4.05	2.00	44.15	\$3,269.84	\$ -	\$6,118.00	\$9,387.84	2.00	31.00	62.00	33.00	5.10	4.05	2.00	44.15	\$3,269.84	\$ -

Labor Costs: Subpart E (annual performance test option)

existing facilities

Labor Rates (per hour)								Labor Cost per Year per Reporting Facility	1	2021
Industrial Manager		Industrial Engineer/Technician		Administrative Support						
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		1	2022
\$91.33		\$73.83		\$34.09					1	2023
0	1.2	0	12	0	0.6	\$0	\$1,131			
0	0	0	0	0	0	\$0	\$0			
0	0.5	0	2	0	0.5	\$0	\$210			
0	0.1	0	1	0	0.05	\$0	\$85			
0	1	0	4	0	1	\$0	\$421			
0	2.8	0	19	0	2.15	\$0	\$1,847			

Table D-1 - Respondent Labor Rates

Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

		Annual Average											
O&M Cost (\$)	Total Cost (\$)	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 (\$)
\$6,118.00	\$9,387.84	2.00	31.00	62.00	33.00	5.10	4.05	2.00	44.15	\$3,269.84	\$ -	\$6,118.00	\$9,387.84

Total for 3 year

\$ 28,164

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

r period

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
F. Aluminum Production	7.00	23.00	161.00	378.50	47.40	13.45	7.00	446.35	\$33,535.81	\$ -	\$4,471.00

Table 46. Labor Costs: Subpart F (using contractor and rented equipment for slope-coefficients measurement)

Activity	Labor Rates (per hour)								Labor Cost per Year per Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	1.0	0.0	0.2	0.0	2.0	0.0	0.1	\$0	\$284
QA/QC	0.0	0.0	0.0	0.1	0.0	1.0	0.0	0.1	\$0	\$85
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0	\$210
Analysis (Calculations)	0.0	0.0	0.0	1.9	0.0	19.0	0.0	1.0	\$0	\$1,609
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0	\$421
Total	0.0	1.0	0.0	3.7	0.0	28.0	0.0	2.6	\$0	\$2,609

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart F (using contractor and rented equipment for slope-coefficients measurement)

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation) ^{a,b}					\$0	\$0

Table 47. Capital and O&M C

Activity	Capital Cost (2021\$)
Equipment (selection, purchase, installation)	

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Performance testing ^f					\$0	\$0
Recordkeeping ^c	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs ^{d,e}				\$2,043	\$0	\$2,043
Total	\$0		\$0	\$2,098	\$0	\$2,098

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Performance testing	
Recordkeeping	\$0
Travel	
Sampling Costs	
Total	\$0

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$38,006.81

existing facilities

2

2

2

Costs: Subpart F (us

Cost C

Equipment Lifetime

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$0

between 2017 and 2021. (C
used to determine costs, ple
i-bin/surveymost?bls
Price Indexes-CPI for All Urb
e CPI = 270.970
ion rate between 2017 and

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
7.00	23.00	161.00	378.50	47.40	13.45	7.00	446.35	\$33,535.81	\$ -	\$4,471.00	\$38,006.81

Table 46. Labor Costs: Subpart F (using in-house equipment for slope-coefficients measurement)

2021
2022
2023

Activity	Labor Rates (per hour)								Labor Cost Reporting L
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09		
	Initial Year	Year	Year	Year	Year	Year	Initial Year	Year	
Planning	0.0	1.0	0.0	0.2	0.0	2.0	0.0	0.1	\$0
QA/QC	0.0	0.0	0.0	0.1	0.0	1.0	0.0	0.1	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0
Sampling and Analysis (Calculations)	0.0	0.0	0.0	6.2	0.0	55.5	0.0	0.0	\$0
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0
Total	0.0	1.0	0.0	8.0	0.0	64.5	0.0	1.7	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

0

ing in-house equipment for slope-coefficients measurement)

Categories		Total Reporting per Facility Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
		\$0	\$0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

			\$0	\$0
	\$0	\$55	\$0	\$55
			\$0	\$0
		\$0	\$0	\$0
	\$0	\$55	\$0	\$55

O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021. Please refer to the 2019 ICR.

Consumer Prices for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
7.00	23.00	161.00	378.50	47.40	13.45	7.00	446.35	\$33,535.81	\$ -	\$4,471.00	\$38,006.81	7.00	23.00	161.00

	existing facilities	5	2021
per Year per Jnit/Facility		5	2022
Subseq. Year		5	2023
\$284			
\$85			
\$210			
\$4,659			
\$421			
\$5,659			

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average								
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 (\$)
378.50	47.40	13.45	7.00	446.35	\$33,535.81	\$ -	\$4,471.00	\$38,006.81

Total for 3 year period

\$ 114,020

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
G. Ammonia Manufacturing	29.00	134.00	3,886.00	1,030.40	103.00	72.80	29.00	1,235.20	\$91,292.37	\$ -

Table 46. Labor Costs: Subpart G (yearly feedstock sampling to confirm supplier information)

Activity	Labor Rates (per hour)								Labor Cost per Facility
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
									Initial Year
Planning	1.0	1.0	0.5	0.3	5.3	2.6	0.3	0.1	\$562
QA/QC	0.0	0.0	0.3	0.3	2.6	2.6	0.1	0.1	\$224
Recordkeeping	0.0	0.0	0.5	0.5	5.0	5.0	0.5	0.5	\$432
Sampling and Analysis (Calculations)	0.0	0.0	0.9	0.9	8.9	8.9	0.4	0.4	\$756
Reporting	0.0	0.0	1.0	1.0	10.0	10.0	1.0	1.0	\$864
Total	1.0	1.0	3.2	2.9	31.9	29.2	2.3	2.2	\$2,838

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart G (yearly feedstock sampling to confirm supplier information)

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)		Activity
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years	

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55
Travel					\$0	\$0
Sampling Costs				\$1,105	\$1,105	\$1,105
Total	\$0		\$0	\$1,160	\$1,160	\$1,160

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00005A0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Equipment (selection, purchase, installation)	
Performance testing	
Recordkeeping	
Travel	
Sampling Costs	
Total	

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00005A0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
\$143,035.00	\$234,327.37	29.00	134.00	3,886.00	1,030.40	103.00

existing facilities

Year per ty	20	\$2,021
	20	\$2,022
	20	2023
Subseq. Year		
\$339		
\$224		
\$432		
\$756		
\$864		
\$2,614		

Table

Activity	Lawyer \$114.80	
	Initial Year	Subseq. Year
Planning	0.0	1.0
QA/QC	0.0	0.0
Recordkeeping	0.0	0.0
Sampling and Analysis (Calculations)	0.0	0.0
Reporting	0.0	0.0
Total	0.0	1.0

Labor rates are obtained from appendix D-1 - Re:

Estimated hours for planning, QA/AC, Recordkee

0

Table 47. Capital and O&M Costs: Subpart G (monthly feedstock sampling)

Cost Categories				Total Reporting per Facility Cost (2021\$)	
Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

\$0		\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$55	\$0	\$0
			\$13,260	\$0	\$13,260
\$0		\$0	\$13,315	\$0	\$13,315

5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be
 For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

: data/bls.gov/cgi-bin/surveymost?bls

istics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

.20; 2021 Average CPI = 270.970

4, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2							Year 3					
Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
72.80	29.00	1,235.20	\$91,292.37	\$ -	\$143,035.00	\$234,327.37	29.00	134.00	3,886.00	1,030.40	103.00	72.80

46. Labor Costs: Subpart G (monthly feedstock sampling)

Labor Rates (per hour)						Labor Cost per Year per Facility	
Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09			
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
0.0	0.3	0.0	2.6	0.0	0.1	\$0	\$339
0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
0.0	0.5	0.0	5.0	0.0	0.5	\$0	\$432
0.0	3.2	0.0	31.9	0.0	1.6	\$0	\$2,703
0.0	1.0	0.0	10.0	0.0	1.0	\$0	\$864
0.0	5.0	0.0	49.6	0.0	3.2	\$0	\$4,337

existing facilities

9	\$2,021
9	\$2,022
9	2023

dependent Labor Rates

Sampling, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

						Annual Average							
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)
29.00	1,235.20	\$91,292.37	\$ -	\$143,035.00	\$234,327.37	29.00	134.00	3,886.00	1,030.40	103.00	72.80	29.00	1,235.20

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$91,292.37	\$ -	\$143,035.00	\$234,327.37

Total for 3 year period

\$ 702,982

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
H. Cement Production	92	112.00	10,304.00	1,656.00	230.00	322.00	23.00	2,231.00	\$156,885.76	\$ -	\$5,060.00

Table 46. Labor Costs: Subpart H

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planninga	0	0.25	0	0.5	0	1	0	1	\$0	\$182
QA/QC	0	0	0	0.5	0	1	0	1	\$0	\$154
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0		1	0	0	\$0	\$74
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	0.25	0	2.5	0	18	0	3.5	\$0	\$1,705

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart H

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Existing facilities

92 2021

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	NA	\$0	\$0	\$0	\$0
Performance testing	\$0	NA	\$0	\$0	\$0	\$0
Recordkeeping	\$0	NA	\$0	\$55	\$0	\$55
Travel	\$0	NA	\$0	\$0	\$0	\$0
Sampling Costs	\$0	NA	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

92 **2022**

92 **2023**

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

..

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$161,945.76

Existing facilities

\$92

92

92

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
92.00	112.00	10,304.00	1,656.00	230.00	322.00	23.00	2,231.00	\$156,885.76	\$ -	\$5,060.00	\$161,945.76	92.00	112.00	10,304.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
1,656.00	230.00	322.00	23.00	2,231.00	\$156,885.76	\$ -	\$5,060.00	\$161,945.76	92.00	112.00	10,304.00	1,656.00	230.00	322.00	23.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

					Total for 3 year period
Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	
2,231.00	\$156,885.76	\$ -	\$5,060.00	\$161,945.76	\$ 485,837

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
I. Electronics Manufacturing	51.00	379.00	19,329.00	10,655.43	889.95	553.86	61.20	12,160.44	\$893,876.38

Table 46. Labor Costs: Subpart I

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	1.198	1.198	2.6	1.6	4.6	1.6	2.0	0.0
QA/QC	0	0	1	1	5	5	0.5	0.5
Recordkeeping	0	0	1	1	13	13	1	1
Sampling and Analysis (Calculations)	0	0	11.9	11.9	183.3	163.3	7.4	7.4
Reporting	0	0	2	2	26	26	2	2
Total	1.198	1.20	18.45	17.45	231.93	208.93	12.86	10.86

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

New sources 0

Table 47. Capital and O&M Costs: Subpart I

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

Existing facilities

51

51

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)						\$0	\$0	51
Performance testing						\$0	\$0	
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55	\$55	
Travel				\$0	\$0	\$0	\$0	\$0
Sampling Costs			\$0		\$55	\$55	\$55	
Total	\$0		\$0	\$55	\$55	\$55	\$55	\$2,805

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

'''

New sources

0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$288,776.00	\$1,182,652.38

		Existing facilities
		51
Labor Cost per Year per Reporting Unit/Facility		51
		51
Initial Year	Subseq. Year	
\$782	\$401	
\$478	\$478	
\$1,085	\$1,085	
\$14,869	\$13,393	\$0.00
\$2,170	\$2,170	
\$19,384	\$17,527	\$893,877.00

2021

2022

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2									
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 (\$)
51.00	379.00	19,329.00	10,655.43	889.95	553.86	61.20	12,160.44	\$893,876.38	\$ -

2021

2022
2023

Table 47. Capital and O&M Costs: Subpart I - Facilities with Abatement Tools That Measure DRE

existing sources

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)		7	2021
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
							7	2022

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)						\$0	\$0	7	2023
Performance testing						\$0	\$0		
Recordkeepin g	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
Travel					\$0	\$0	\$0		\$0
Sampling Costs					\$40,853		\$40,853		
Total	\$0		\$0	\$40,853		\$0	\$40,853		\$285,971.00

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

'''

new sources

0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

		Year 3												
O&M Cost (\$)	Total Cost (\$)	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 (\$)	No. Respondents
\$288,776.00	\$1,182,652.38	51.00	379.00	19,329.00	10,655.43	889.95	553.86	61.20	12,160.44	\$893,876.38	\$ -	\$288,776.00	\$1,182,652.38	51.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$0.00

\$285,971.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average										
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 (\$)
379.00	19,329.00	10,655.43	889.95	553.86	61.20	12,160.44	\$893,876.38	\$ -	\$288,776.00	\$1,182,652.38

Total for 3 year period

\$ 3,547,957

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
K. Ferroalloy Production	8	179.00	1,432.00	256.00	25.60	18.80	16.00	316.40	\$23,716.22	\$ -

Table 46. Labor Costs: Subpart K

Activity	Labor Rates (per hour)								Labor Cos per Rej Unit/F
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	1	0	0.3	0	3	0	0.15	\$0
QA/QC	0	1	0	0.2	0	2	0	0.1	\$0
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	1.2	0	12	0	0.6	\$0
Reporting	0	0	0	1	0	10	0	1	\$0
Total	0	2	0	3.2	0	32	0	2.35	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart K

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
	Existing facilities					8
					8	2022

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing	\$0		\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$55	\$55

8 **2023**

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$440.00	\$24,156.22

	Existing facilities
	8
Cost per Year reporting facility	8
Subseq. Year	8
\$369	
\$284	
\$432	
\$1,016	
\$864	
\$2,965	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
8.00	179.00	1,432.00	256.00	25.60	18.80	16.00	316.40	\$23,716.22	\$ -	\$440.00	\$24,156.22	8.00	179.00	1,432.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
256.00	25.60	18.80	16.00	316.40	\$23,716.22	\$ -	\$440.00	\$24,156.22	8.00	179.00	1,432.00	256.00	25.60	18.80	16.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
316.40	\$23,716.22	\$ -	\$440.00	\$24,156.22

Total for 3 year period

\$ 72,469

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Labor Rates (per hour)									Labor Cost per Reporting Unit
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		Initial Year	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
		\$114.80		\$91.33		\$73.83		\$34.09		
Planning	0	2	0	1	0	1	0	0	0	\$0
QA/QC	0	0	0	5	0	0	0	0	0	\$0
Recordkeeping	0	0	0	1	0	13	0	0	1	\$0
Sampling and Analysis (Calculations)	0	0	0	197.75	0	3,955	0	0	395.5	\$0
Reporting	0	0	0	2	0	26	0	0	2	\$0
Total	0	2	0	206.75	0	3,995	0	0	398.5	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Subpart L - Table 1c - Conducting Scoping Speciation

Activity	Labor Rates (per hour)									Labor Cost per Reporting Unit
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		Initial Year	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
		\$114.80		\$91.33		\$73.83		\$34.09		
Planning	0	0	0	0	0	0	0	0	0	\$0
QA/QC	0	0	0	5	0	0	0	0	0	\$0
Recordkeeping	0	0	0	0	0	0	0	0	0	\$0
Sampling and Analysis (Calculations)	0	0	0	12.5	0	250	0	0	25	\$0
Reporting	0	0	0	0	0	0	0	0	0	\$0
Total	0	0	0	17.5	0	250	0	0	25	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Subpart L - Table 1d - Estimating Equipment Leak Emissions from Average Size Facility

Activity	Labor Rates (per hour)									Labor Cost per Reporting Unit
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		Initial Year	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
		\$114.80		\$91.33		\$73.83		\$34.09		

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Sampling and Analysis (Calculations)	0	0	0	18.15	0	363	0	36.3	\$0
Reporting	0	0	0	0	0	0	0	0	\$0
Total	0	2	0	23.15	0	363	0	36.3	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Subpart L - Table 1g - Estimating Container Venting Emissions

Activity	Labor Rates (per hour)										
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		Labor Cost per Reporting Unit		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	2	0	1	0	0	0	0	0	0	\$0
QA/QC	0	0	0	1	0	0	0	0	0	0	\$0
Recordkeeping	0	0	0	0	0	0	0	0	0	0	\$0
Sampling and Analysis (Calculations)	0	0	0	0.68	0	13.6	0	1.36	0	1.36	\$0
Reporting	0	0	0	0	0	0	0	0	0	0	\$0
Total	0	2	0	2.68	0	13.6	0	1.36	0	1.36	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$770.00	\$842,802.43

per Year per unit/Facility
Subseq. Year
\$395
\$457
\$1,085
\$14,087
\$2,170
\$18,194

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

per Year per nit/Facility
Subseq. Year
\$395
\$457
\$1,085
\$323,541
\$2,170
\$327,648

per Year per nit/Facility
Subseq. Year
\$0
\$457
\$0
\$20,451
\$0
\$20,908

per Year per nit/Facility

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Subseq. Year
\$0
\$457
\$0
\$6,594
\$0
\$7,050

per Year per unit/Facility
Subseq. Year
\$0
\$457
\$0
\$119,027
\$0
\$119,484

per Year per unit/Facility
Subseq. Year
\$230
\$457
\$0

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$29,695
\$0
\$30,382

per Year per it/Facility
Subseq. Year
\$321
\$91
\$0
\$1,113
\$0
\$1,525

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												
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 (\$)	No. Respondents
14	363.00	5,082.00	10,048.20	670.28	990.56	45.20	11,754.24	\$842,032.43	\$ -	\$770.00	\$842,802.43	14

Subpart L - Table 2 - Subpart L

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)				\$0	\$0	\$0
Performance testing				\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs					\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Yes

Number of
Facilities
13

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Number of
Facilities
1

Number of Facilities
1

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Number of
Facilities
7

Number of
Facilities
1

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Number of
Facilities
2.6

Number of
Facilities
6

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3															
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
363.00	5,082.00	10,048.20	670.28	990.56	45.20	11,754.24	\$842,032.43	\$ -	\$770.00	\$842,802.43	14.00	363.00	5,082.00	10,048.20	670.28

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average						
Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
990.56	45.20	11,754.24	\$842,032.43	\$ -	\$770.00	\$842,802.43

Total for 3 year period

\$ 2,528,407

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
N. Glass Production	101.00	60.00	6,060.00	3,948.90	482.60	320.90	99.00	4,851.40	\$357,927.83	\$ -

Table 46. Labor Costs: Subpart N (non-CEMS Supplier Mass Fraction Option)

Activity	Labor Rates (per hour)								Labor Cost per Facility
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0.0	1.0	0.0	0.4	0.0	3.8	0.0	0.2	\$0
QA/QC	0.0	0.0	0.0	0.5	0.0	4.6	0.0	0.2	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0
Sampling and Analysis (Calculations)	0.0	0.0	0.0	2.8	0.0	28.4	0.0	1.4	\$0
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0
Total	0.0	1.0	0.0	5.2	0.0	42.7	0.0	3.3	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources

0

Table 47. Capital and O&M Costs: Subpart N (non-CEMS supplier)

Cost Categories	Total Reporting per Reporter Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)					\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs				\$530	\$0	\$530
Total	\$0		\$0	\$585	\$0	\$585

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Activity
Equipment (selection, purchase, installation)
Performance testing
Recordkeeping
Travel
Sampling Costs
Total

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
\$11,385.00	\$369,312.83	101.00	60.00	6,060.00	3,948.90	482.60

Existing facilities	11	11	11	Activity	Lawyer \$114.80	
					Initial Year	Subseq. Year
per Year per facility				Planning	1.0	1.0
Subseq. Year				QA/QC	0.0	0.0
\$437				Recordkeeping	0.0	0.0
\$386				Sampling and Analysis (Calculations)	0.0	0.0
\$210				Reporting	0.0	0.0
\$2,401				Total	1.0	1.0
\$421						
\$3,855						

Labor rates are obtained from appendix D-1 -

Estimated hours for planning, QA/AC, Recordk

0

Table 47. Capital and O&M Costs: Subpart N (non-CEMS default)

Cost Categories	Total Reporting per Reporter Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
					\$0
					\$0
\$0	\$0	\$0	\$55		\$55
					\$0
			\$0		\$0
\$0		\$0	\$55	\$55	\$55

n a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please see the ICR.

values: data/bls.gov/cgi-bin/surveymost?bls

or Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) -

: 245.120; 2021 Average CPI = 270.970

: 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2							Year 3					
Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
320.90	99.00	4,851.40	\$357,927.83	\$ -	\$11,385.00	\$369,312.83	101.00	60.00	6,060.00	3,948.90	482.60	320.90

Table 46. Labor Costs: Subpart N (non-CEMS Default Mass Fraction Option)

Labor Rates (per hour)							
Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		Labor Cost per Year per Facility	
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
0.4	0.4	3.8	3.8	0.2	0.2	\$437	\$437
0.2	0.2	2.3	2.3	0.1	0.1	\$193	\$193
0.5	0.5	2.0	2.0	0.5	0.5	\$210	\$210
2.7	2.7	27.4	27.4	1.4	1.4	\$2,317	\$2,317
1.0	1.0	4.0	4.0	1.0	1.0	\$421	\$421
4.8	4.8	39.4	39.4	3.2	3.2	\$3,577	\$3,577

Existing facilities

88

88

88

Activity	Law Initial Year
Planning	0.0
QA/QC	0.0
Recordkeeping	0.0
Sampling and Analysis (Calculations)	0.0
Reporting	0.0
Total	0.0

Respondent Labor Rates

Labor rates are obtain

keeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Estimated hours for pl

Table 47. Capital and O&M Costs: Subpart N (CEMS)

Cost Categories	Total Reporting per Reporter Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)					\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs				\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

						Annual Average									
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	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 (\$)
99.00	4,851.40	\$357,927.83	\$ -	\$11,385.00	\$369,312.83	101.00	60.00	6,060.00	3,948.90	482.60	320.90	99.00	4,851.40	\$357,927.83	\$ -

Table 46. Labor Costs: Subpart N (CEMS)

Existing facilities

Labor Rates (per hour)									Labor Cost per Year per Facility
Year	Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09				
Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	
0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	
0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0	\$210	
0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	
0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0	\$421	
0.0	0.0	1.5	0.0	6.0	0.0	1.5	\$0	\$631	

Adapted from appendix D-1 - Respondent Labor Rates

Planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

O&M Cost (\$)	Total Cost (\$)
\$11,385.00	\$369,312.83

Total for 3 year period

\$ 1,107,938

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
Production and HFC-23 Destruction	4.00	32.00	128.00	384.00	26.00	38.00	8.00	456.00	\$32,939.12	\$ -

Table 46. Labor Costs: Subpart O (mass balance)

Activity	Labor Rates (per hour)								Labor Cos Reporting
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0.0	2.0	0.0	1.0	0.0	1.0	0.0	0.0	\$0
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	5.0	0.0	0.5	\$0
Sampling and Analysis (Calculations)	0.0	0.0	0.0	4.7	0.0	93.0	0.0	9.3	\$0
Reporting	0.0	0.0	0.0	1.0	0.0	10.0	0.0	1.0	\$0
Total	0.0	2.0	0.0	7.2	0.0	109.0	0.0	10.8	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart O

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$220.00	\$33,159.12

	existing facilities
	1
t per Year per Unit/Facility	1
Subseq. Year	1
\$395	
\$0	
\$432	
\$7,608	
\$864	
\$9,298	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												
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 (\$)	No. Respondents
4.00	32.00	128.00	384.00	26.00	38.00	8.00	456.00	\$32,939.12	\$ -	\$220.00	\$33,159.12	4.00

Table 46. Labor Costs: Subpart O (emission point testing)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	2.0	0.0	1.0	0.0	1.0	0.0	0.0	\$0	\$395
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	5.0	0.0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0.0	0.0	0.0	5.7	0.0	113.0	0.0	11.3	\$0	\$9,244
Reporting	0.0	0.0	0.0	1.0	0.0	10.0	0.0	1.0	\$0	\$864
Total	0.0	2.0	0.0	8.2	0.0	129.0	0.0	12.8	\$0	\$10,934

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)
32.00	128.00	384.00	26.00	38.00	8.00	456.00	\$32,939.12	\$ -	\$220.00	\$33,159.12	4.00	32.00	128.00	384.00

Existing facilities

Table 46. Labor Costs: Subpart O (destruction of HFC-23)

Existing facilities

\$1 2021

\$1 2022
\$1 2023

\$2

\$2
\$2

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	2.0	0.0	1.0	0.0	1.0	0.0	0.0	\$0	\$395
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	5.0	0.0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0.0	0.0	0.0	2.9	0.0	57.0	0.0	5.7	\$0	\$4,663
Reporting	0.0	0.0	0.0	1.0	0.0	10.0	0.0	1.0	\$0	\$864
Total	0.0	2.0	0.0	5.4	0.0	73.0	0.0	7.2	\$0	\$6,353

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average							
Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
26.00	38.00	8.00	456.00	\$32,939.12	\$ -	\$220.00	\$33,159.12

Total for 3 year period

\$ 99,477

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation) ^a	\$0	\$0	\$0	\$0	\$0	\$0
Performance testing	\$0	\$0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$55	\$0	\$55

\$165

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Equipment (selection, purchase, installation) ^a	\$0	\$0
Performance testing	\$0	\$0
Recordkeeping	\$0	\$0
Travel	\$0	\$0
Sampling Costs ^b	\$0	\$0
Total	\$0	\$0

Values are based on a 10.5% inflation rate b (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$55	\$55
\$0	\$0	\$0	\$0
\$0	\$232	\$232	\$232
\$0	\$287	\$287	\$287

\$12,341

between 2017 and 2021. O&M values from the 2019 ICR were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

CPI = 270.970
Inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Equipment (selection, purchase, installation) ^a	\$0	\$0	\$0	\$0	\$0	\$0
Performance testing	\$0	\$0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	\$0	\$0	\$232	\$0	\$232
Total	\$0	\$0	\$0	\$287	\$0	\$287

\$6,888

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation) ^a	\$0	\$0	\$0	\$0	\$0	\$0
Performance testing	\$0	\$0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	\$0	\$0	\$464	\$0	\$464
Total	\$0	\$0	\$0	\$519	\$0	\$519

\$18,684

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Equipment (selection, purchase, installation) ^a	\$0	\$0	\$0	\$0	\$0	\$0
Performance testing	\$0	\$0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	\$0	\$0	\$1,929	\$0	\$1,929
Total	\$0	\$0	\$0	\$1,984	\$0	\$1,984

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average					
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
92.00	4,605.68	\$335,441.24	\$ -	\$47,998.00	\$383,439.24

Total for 3 year period

\$ 1,150,318
\$383,439

Table 46. Labor Costs: Subpart P (Mass balance; NG and solid fuels, multiple units)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	0	0	0.4	0	4	0	0.4	\$0	\$345
QA/QC	0	0	0	0.8	0	8	0	0.8	\$0	\$691
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	2.28	0	22.8	0	2.28	\$0	\$1,969
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	0	0	4.98	0	49.8	0	4.98	\$0	\$4,301

Existing facilities

36

36

36

2151.36

\$154,836.00

Activity
Planning
QA/QC
Recordkeeping
Sampling and Analysis (Calculations)
Reporting
Total

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

solid fuel)

Reporting per Unit/Facility
Subseq. Years

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

	\$0
	\$0
	\$55
	\$0
	\$1,929
	\$1,984
	\$9,920

M values from
effective of 2021
refer to the

Consumers (CPI-

21 = 10.54%,

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Table 46. Labor Costs: Subpart P (Mass balance; NG and solid fuels)

Existing facilities

Labor Rates (per hour)									
Lawyer \$112.23		Industrial Manager \$87.45		Engineer/Technician \$71.45		Administrative Support \$36.28		Labor Cost per Year per Facility a	
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
0.0	0.0	0.0	0.4	0.0	4.0	0.0	0.4	\$0	\$335
0.0	0.0	0.0	0.2	0.0	2.0	0.0	0.2	\$0	\$168
0.0	0.0	0.0	0.5	0.0	5.0	0.0	0.5	\$0	\$419
0.0	0.0	0.0	0.1	0.0	1.0	0.0	0.1	\$0	\$84
0.0	0.0	0.0	1.0	0.0	10.0	0.0	1.0	\$0	\$838
0.0	0.0	0.0	2.2	0.0	22.0	0.0	2.2	\$0	\$1,844

5

5

5

132

\$9,220.53

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
Q. Iron and Steel Production	122	61.00	7,442.00	2,191.00	328.90	255.95	162.00	2,937.85	\$219,122.90	\$ -	\$128,260.00

Table 46. Labor Costs: Subpart Q (Mass Balance Sampling)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	1.0	0.0	0.3	0.0	3.0	0.0	0.2	\$0	\$369
QA/QC	0.0	1.0	0.0	0.2	0.0	2.0	0.0	0.1	\$0	\$284
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0	\$210
Sampling and Analysis (Calculations)	0.0	0.0	0.0	1.2	0.0	12.0	0.0	0.6	\$0	\$1,016
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0	\$421
Total	0.0	2.0	0.0	3.2	0.0	23.0	0.0	2.4	\$0	\$2,300

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart Q (Mass balance sampling)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Table 47. Capital and O&M Costs: Subpart Q (Mass balance sampling)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing	\$0		\$0	\$0	\$0	\$0
Recordkeeping	\$0		\$0	\$55	\$0	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$1,105	\$0	\$1,105
Total	\$0		\$0	\$1,160	\$0	\$1,160

\$60,320

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Activity	Capital Cost (2021\$)
Equipment (selection, purchase, installation) ^a	\$0
Performance testing	\$0
Recordkeeping	\$0
Travel	\$0
Sampling Costs ^b	\$0
Total	\$0

Values are based on a 10.5% (2017 values) were increased to be reflective of 2021 costs, please refer to the 2019 ICR for explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$347,382.90

Existing
facilities

52

52

52

Capital and O

Cost t

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												
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 (\$)	No. Respondents
122.00	61.00	7,442.00	2,191.00	328.90	255.95	162.00	2,937.85	\$219,122.90	\$ -	\$128,260.00	\$347,382.90	122.00

Table 46. Labor Costs: Subpart Q (mass balance supplier)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility		
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09				
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0	\$210	
Sampling and Analysis (Calculations)	0.0	0.0	0.0	0.2	0.0	2.0	0.0	0.1	\$0	\$169	
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0	\$421	
Total	0.0	0.0	0.0	1.7	0.0	8.0	0.0	1.6	\$0	\$800	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

new sources 0

&M Costs: Subpart Q (mass balance supplier)

Categories	Total Reporting per Unit/Facility Cost (2021\$)

Table 47. Capital and O&M Costs: Subpart Q (site specific EF)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55

\$1,375

etween 2017 and 2021. O&M values from the 2019 ICR (based on reflective of 2021 costs. For explanation of methodologies used to

in/surveymost?bls

ce Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100

:PI = 270.970

i rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipme nt (selection , purchase, installatio n)	\$0		\$0	\$0	\$0	\$0
Performa nce testing	\$0		\$0	\$0	\$0	\$0
Recordke eping	\$0		\$0	\$55	\$0	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$2,210	\$0	\$2,210
Total	\$0		\$0	\$2,265	\$0	\$2,265

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

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**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3											No. Respondents	Responses/ Respondent	Total Responses
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 (\$)			
61.00	7,442.00	2,191.00	328.90	255.95	162.00	2,937.85	\$219,122.90	\$ -	\$128,260.00	\$347,382.90	122.00	61.00	7,442.00

Existing facilities

Table 46b. Labor Costs: Subpart Q, Site-Specific Emission Factor Method

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	1.0	0.0	0.3	0.0	3.0	0.0	0.2	\$0	\$369
QA/QC	0.0	1.0	0.0	0.2	0.0	2.0	0.0	0.1	\$0	\$284
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	\$0	\$210
Sampling and Analysis (Calculations)	0.0	0.0	0.0	1.2	0.0	12.0	0.0	0.6	\$0	\$1,016
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	\$0	\$421
Total	0.0	2.0	0.0	3.2	0.0	23.0	0.0	2.4	\$0	\$2,300

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

new sources 0

Table 47. Capital and O&M Costs: Subpart Q (CEMS)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing	\$0		\$0	\$0	\$0	\$0
Recordkeeping	\$0		\$0	\$55	\$0	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

\$65,685

\$880

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

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**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average								
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 (\$)
2,191.00	328.90	255.95	162.00	2,937.85	\$219,122.90	\$ -	\$128,260.00	\$347,382.90

Total for 3 year period

\$ 1,042,149

Existing facilities

Table 46c. Labor Costs: Subpart Q, CEMS Method

Existing facilities

29
29
29

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility		
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09				
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5	0.0	\$0	\$210
Sampling and Analysis (Calculations)	0.0	0.0	0.0	0.2	0.0	2.0	0.0	0.1	0.0	\$0	\$169
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0	0.0	\$0	\$421
Total	0.0	0.0	0.0	1.7	0.0	8.0	0.0	1.6	0.0	\$0	\$800

16
16
16

885.95
\$66,700

180.8
\$12,800.00

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1											
	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 (\$)
R. Lead Production	11.00	79.00	869.00	198.00	29.70	23.10	22.00	272.80	\$20,643.92	\$ -	\$12,760.00	\$33,403.92

Table 46. Labor Costs: Subpart R

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Year	Year	Year	Year	Initial Year	Year
Planning	0	1	0	0.4	0	4	0	0.2	\$0	\$453
QA/QC	0	1	0	0.3	0	3	0	0.15	\$0	\$369
Recordkeeping	0	0	0	0.5	0	2	0	0.5	\$0	\$210
Sampling and Analysis (Calculations)	0	0	0	0.5	0	5	0	0.25	\$0	\$423
Reporting	0	0	0	1	0	4	0	1	\$0	\$421
Total	0	2	0	2.7	0	18	0	2.1	\$0	\$1,877

Existing facilities

\$11

\$11

11

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart R

Activity	Cost Categories				Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0

Existing facilities

11 2021

11 2022

11 2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Performance testing	\$0	0			\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$1,105	\$0	\$1,105
Total	\$0		\$0	\$1,160	\$0	\$1,160

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)			
11.00	79.00	869.00	198.00	29.70	23.10	22.00	272.80	\$20,643.92	\$ -	\$12,760.00	\$33,403.92	11.00	79.00	869.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
198.00	29.70	23.10	22.00	272.80	\$20,643.92	\$ -	\$12,760.00	\$33,403.92	11.00	79.00	869.00	198.00	29.70	23.10	22.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
272.80	\$20,643.92	\$ -	\$12,760.00	\$33,403.92

Total for 3 year period

\$ 100,212

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1											
	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-Ferrous Metal Manufacturing	68.00	268.00	18,224.00	1,468.00	146.80	127.60	128.00	1,870.40	\$140,833.97	\$ -	\$3,740.00	\$144,573.97

Table 46. Labor Costs: Subpart S (non CEMS)

Activity	Labor Rates (per hour)										Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Engineer/Technician		Administrative Support		Total			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	1	0	0.4	0	4	0	0.2	\$0	\$453		
QA/QC	0	1	0	0.2	0	2	0	0.1	\$0	\$284		
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432		
Sampling and Analysis (Calculations)	0	0	0	0.1	0	1	0	0.1	\$0	\$85		
Reporting	0	0	0	1	0	10	0	1	\$0	\$864		
Total	0	2	0	2.2	0	22	0	1.9	\$0	\$2,118		

Existing facilities
64
64
64

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart S

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation) ^a	\$0	\$0	\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	\$0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Cost (\$)	No. Respondents	Year 3											No. Respondents	Responses/ Respondent
		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 (\$)		
\$144,573.97	68.00	268.00	18,224.00	1,468.00	146.80	127.60	128.00	1,870.40	\$140,833.97	\$ -	\$3,740.00	\$144,573.97	68.00	268.00

Existing facilities			
Labor Cost per Year per Reporting Unit/Facility		\$4	\$2,021
		\$4	\$2,022
		\$4	\$2,023
Initial Year	Subseq. Year		
	\$0		\$0
	\$0		\$0
	\$0		\$432
	\$0		\$0
	\$0		\$864
	\$0		\$1,296

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average									
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 (\$)
18,224.00	1,468.00	146.80	127.60	128.00	1,870.40	\$140,833.97	\$ -	\$3,740.00	\$144,573.97

Total for 3 year period

\$ 433,722

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
Magnesium Production	10.00	83.00	830.00	120.00	28.00	22.50	10.00	180.50	\$13,331.87	\$ -	\$550.00

Table 46. Labor Costs: Subpart T

Activity	Labor Rates (per hour)										Labor Cost per Year per Reporting Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09		Industrial			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Year	Year	Year	Subseq. Year	Initial Year	Subseq. Year		
Planning	1	1	0.4	0.1	4	1	0.2	0.05	\$453	\$199		
QA/QC	0	0	0.2	0.2	2	2	0.2	0.2	\$173	\$173		
Recordkeeping	0	0	0.5	0.5	2	2	0.5	0.5	\$210	\$210		
Calculations	0	0	1	1	3	3	0.5	0.5	\$330	\$330		
Reporting	0	0	1	1	6	4	1	1	\$568	\$421		
Total	1	1	3.1	2.8	17	12	2.4	2.25	\$1,735	\$1,333		

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart T

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
					10	2021
					10	2022

Existing facilities

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55
Travel					\$0	\$0
Sampling Costs				\$0	\$0	\$0
Total	\$0		\$0	\$55	\$55	\$55

10

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$13,881.87

Existing facilities

\$10

\$10

10

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
10.00	83.00	830.00	120.00	28.00	22.50	10.00	180.50	\$13,331.87	\$ -	\$550.00	\$13,881.87	10.00	83.00	830.00

2021
2022
2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
120.00	28.00	22.50	10.00	180.50	\$13,331.87	\$ -	\$550.00	\$13,881.87	10.00	83.00	830.00	120.00	28.00	22.50	10.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
180.50	\$13,331.87	\$ -	\$550.00	\$13,881.87

Total for 3 year period

\$ 41,646

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1											
	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 (\$)
U. Misc. Uses of Carbonate	5	7.00	35.00	30.00	7.50	7.50	0.00	45.00	\$3,155.55	\$ -	\$275.00	\$3,430.55

Table 46. Labor Costs: Subpart U

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility		Existing facilities	
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Adminstrative Support \$34.09					
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
Planning	0	0	0	0	0	0	0	0	0	\$0	\$0	\$5
QA/QC	0	0	0	0	0	0	0	0	0	\$0	\$0	\$5
Recordkeeping	0	0	0.5	0.5	2	2	0.5	0.5	0.5	\$210	\$210	\$5
Sampling and Analysis (Calculations)	0	0	0	0	0	0	0	0	0	\$0	\$0	
Reporting	0	0	1	1	4	4	1	1	1	\$421	\$421	
Total	0	0	1.5	1.5	6	6	1.5	1.5	1.5	\$631	\$631	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart U

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Existing facilities

5

2021

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0	5	2022
Performance testing					\$0	\$0	5	2023
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55		
Travel	\$0	0	\$0	\$0	\$0	\$0		
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0		
Total	\$0		\$0	\$55	\$55	\$55		

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
5.00	7.00	35.00	30.00	7.50	7.50	0.00	45.00	\$3,155.55	\$ -	\$275.00	\$3,430.55	5.00	7.00	35.00

2021
2022
2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
30.00	7.50	7.50	0.00	45.00	\$3,155.55	\$ -	\$275.00	\$3,430.55	5.00	7.00	35.00	30.00	7.50	7.50	0.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
45.00	\$3,155.55	\$ -	\$275.00	\$3,430.55

Total for 3 year period

\$ 10,292

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
V. Nitric Acid Production	31.00	23.00	713.00	872.80	115.00	80.20	31.00	1,099.00	\$81,234.59

Table 46. Labor Costs: Subpart V (alternative monitoring method option)

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	1	0	0.3	0	3.3	0	0.2
QA/QC	0	0	0	0.8	0	8.1	0	0.4
Recordkeeping	0	0	0	0.5	0	2	0	0.5
Sampling and Analysis (Calculations)	0	0	0	0.2	0	1.6	0	0.1
Reporting	0	0	0	1	0	4	0	1
Total	0	1	0	2.8	0	19	0	2.2

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR N

new sources 0

Table 47. Capital and O&M Costs: Subpart V (alternative monitoring method option)

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation) ^a	\$0	0	\$0	\$0	\$0	\$0

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Performance testing ^b	\$0	0	\$0	\$0	\$0	\$0	
Recordkeeping ^c	\$0	0	\$0	\$55	\$0	\$55	
Travel ^d	\$0	0	\$0	\$0	\$0	\$0	
Sampling Costs ^e	\$0	0	\$0	\$0	\$0	\$0	
Total ^{f,g}	\$0		\$0	\$55	\$0	\$55	\$220

Values are based on a 10.5% inflation rate between 2017 and 2021. Methodologies used to determine costs, please refer to the Source of inflation values: data/bls.gov/cgi-bin/surveymost U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI 2017 Average CPI = 245.120; 2021 Average CPI = 270.970 $270.970/245.120 = 1.1054$, thus the inflation rate between

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
\$ -	\$265,306.00	\$346,540.59	31.00	23.00	713.00	872.80	115.00

Existing facilities

4

Table 46. La

Labor Cost per Year per Facility	
Initial Year	Subseq. Year
\$0	\$390
\$0	\$688
\$0	\$210
\$0	\$138
\$0	\$421
\$0	\$1,847

Activity	Labor Rates (per hour)	
	Initial Year	Subseq. Year
Lawyer	\$114.80	
Planning	0	1
QA/QC	0	0
Recordkeeping	0	0
Sampling and Analysis (Calculations)	0	0
Reporting	0	0
Total	0	1

Labor rates are obtained from appendix D-1 - F

d. 2300.18)

Estimated hours for planning, QA/AC, Recordk

Table 47. Capital and O&M Costs: Subpart V (annual performance test option)

Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Performance testing	\$0	0	\$0	\$9,763	\$0	\$9,763
Recordkeeping	\$0	0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$9,818	\$0	\$9,818

\$327,807

nd 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of
: 2019 ICR.

?bls

for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

						Annual Average									
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	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 (\$)
31.00	1,099.00	81,234.59	-	265,306.00	346,540.59	31.00	23.00	713.00	872.80	115.00	80.20	31.00	1,099.00	\$81,234.59	\$ -

Labor Costs: Subpart V (annual performance test option with abatement) a

Existing facilities

Costs (per hour)										
	Industrial Manager \$114.80		Engineer/Technician \$91.33		Support \$73.83		Support \$34.09		Labor Cost per Year per Reporting Unit/Facility	
Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
1	0	2	0	19.5	0	1	\$0	\$1,766		
0	0	0	0	0	0	0	\$0	\$0		
0	0	0.5	0	2	0	0.5	\$0	\$210		
0	0	0.5	0	4.9	0	0.2	\$0	\$413		
0	0	1	0	4	0	1	\$0	\$421		
1	0	3.9	0	30.4	0	2.7	\$0	\$2,810		

12

Appendix D-1 - Respondent Labor Rates

AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

O&M Cost (\$)	Total Cost (\$)
\$265,306.00	\$346,540.59

Total for 3 year period

\$ 1,039,622

Source Category					
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technician (hrs)	Burden - Engineer (hrs)
W. Oil and Natural Gas Systems	2,338	3,294	7,701,372	11,847	229,145

Labor Rates

ICR Labor Category
Middle Manager
Senior Manager
Engineers
Technicians
Lawyer

Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
		\$114.80		\$132.31
Planning	0	2	0	0.5
QA/QC	0	0	0	0.5
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	1

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Onshore				
Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	0.5
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	1

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Un				
Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	0.3
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0

Total	0	2	0	0.8
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Labor rates are obtained from appendix D-1 - Respondent Labor Rates
 Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

					LN
Labor Rates (per hour)					
Lawyer			Senior Manager		
\$114.80			\$132.31		
Activity	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	
Planning	0	2	0	0.5	
QA/QC	0	0	0	0.4	
Recordkeeping	0	0	0	0	
Sampling and Analysis (Calculations)	0	0	0	0	
Reporting	0	0	0	0	
Total	0	2	0	0.9	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
 Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

					Onshore F
Labor Rates (per hour)					
Lawyer			Senior Manager		
\$114.80			\$132.31		

Activity	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	10.1
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	10.6

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
			\$114.80	\$132.31
Planning	0	2	0	0.5
QA/QC	0	0	0	0.3
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	0.8

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	0.2
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	0.7

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Activity	Onshore Petroleum Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	1.7
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	2.2

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Na				
Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.5
QA/QC	0	0	0	0.2
Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	0.7

Labor rates are obtained from appendix D-1 - Respondent Labor Rates
 Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

Ta

Offshore I				
Activity	Labor Rates (per hour)			
	Lawyer		Senior Manager	
	\$114.80		\$132.31	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
Planning	0	2	0	0.3
QA/QC	0	0	0	0

Recordkeeping	0	0	0	0
Sampling and Analysis (Calculations)	0	0	0	0
Reporting	0	0	0	0
Total	0	2	0	0.3

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calc

0.0	20.0	0.0	19.0
	0.00		0.00
	0.00		0.00

Year 1							
Burden - Middle Manager (hrs)	Burden - Senior Manager (hrs)	Burden - Lawyer (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
20,925	7,061	4,676	273,653	\$30,223,171.41	\$ -	\$ 24,410,343	\$ 54,633,514

Loaded Hourly Rates for Renewal ICR (2014\$ Q2) (15)

- \$123.46
- \$132.31
- \$110.17
- \$77.99
- \$114.80

Table 46. Labor Costs: Subpart W
Onshore Natural Gas Processing reporters

Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	0.9	0	0	0	0	\$0	\$174
0	1	0	13	0	1	\$0	\$1,634
0	0	0	9.2	0	0.1	\$0	\$1,021
0	2	0	26	0	2	\$0	\$3,267
0	4.9	0	58.2	0	3.1	\$0	\$7,617

ulations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

Table 46. Labor Costs: Subpart W

Natural Gas Transmission Compression reporters

Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	1	0	0	0	0	\$0	\$183
0	1	0	13	0	1	\$0	\$1,634
0	0	0	9.6	0	0	\$0	\$1,063
0	2	0	26	0	2	\$0	\$3,267
0	5	0	58.6	0	3	\$0	\$7,668

Calculations), and reporting, are based on 2019 ICR

Table 46. Labor Costs: Subpart W

Underground Natural Gas Storage reporters

Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	0.6	0	0	0	0	\$0	\$112
0	1	0	13	0	1	\$0	\$1,634
0	0	0	5.9	0	0.4	\$0	\$683
0	2	0	26	0	2	\$0	\$3,267

Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	20.2	0	0	0	0	\$0	\$3,838
0	1	0	13	0	1	\$0	\$1,634
0	0	0	202.4	0	9.1	\$0	\$23,004
0	2	0	26	0	2	\$0	\$3,267
0	24.2	0	251.4	0	12.1	\$0	\$33,264

ulations), and reporting, are based on 2019 ICR

able 46. Labor Costs: Subpart W

Natural Gas Distribution reporters							
Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	0.6	0	0	0	0	\$0	\$114
0	1	0	13	0	1	\$0	\$1,634
0	0	0	6	0	0.4	\$0	\$696
0	2	0	26	0	2	\$0	\$3,267
0	4.6	0	55	0	3.4	\$0	\$7,231

ulations), and reporting, are based on 2019 ICR

able 46. Labor Costs: Subpart W

LNG Storage reporters

Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	0.4	0	0	0	0	\$0	\$81
0	1	0	13	0	1	\$0	\$1,634
0	0	0	4.3	0	0.375	\$0	\$500
0	2	0	26	0	2	\$0	\$3,267
0	4.4	0	53.3	0	3.4	\$0	\$7,002

ulations), and reporting, are based on 2019 ICR

Table 46. Labor Costs: Subpart W

Sum and Natural Gas Gathering and Boosting reporters

Middle Manager		Engineer		Technician		Labor Cost per Year per Reporter	
\$123.46		\$110.17		\$77.99			
Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year	Subseq. Year
0	1	0	10	0	0	\$0	\$1,521
0	3.3	0	0	0	0	\$0	\$630
0	1	0	13	0	1	\$0	\$1,634
0	0	0	33.2	0	1.7	\$0	\$3,796
0	2	0	26	0	2	\$0	\$3,267
0	7.3	0	82.2	0	4.7	\$0	\$10,848

ulations), and reporting, are based on 2019 ICR

0	1	0	6.5	0	1	\$0	\$918
0	0	0	0	0	0	\$0	\$0
0	1	0	13	0	1	\$0	\$1,634
0	2.6	0	25.5	0	2	\$0	\$3,556

ulations), and reporting, are based on 2019 ICR

0.0	66.7	0.0	748.1	0.0	41.6	0.0	98703.0
	10.00		123.50		10.00		
	19.00		247.00		19.00		

Year 2						
No. Respondents	Responses/ Respondent	Total Responses	Burden - Technician (hrs)	Burden - Engineer (hrs)	Burden - Middle Manager (hrs)	Burden - Senior Manager (hrs)
2,338	3,294	7,701,372	11,847	229,145	20,925	7,061

Existing (2021) 451
New per year 0

Table 47. C
Onshc

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

\$736,934.00

\$1,473,417.00

24.200000000000000 wo R&R

Values are based on a 10.5% inflation rate between 2017 and 2021. The 2021 values were increased by 10.5% to be reflective of 2021 costs. For explanation of inflation rate, see the following source.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bl](https://data.bls.gov/cgi-bin/surveymost?bl)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 654
 New per year 0

Table 47. C
Onshore Natu

\$1,068,636.00

\$2,136,618.00

24.6000000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, which was increased by 10.5% to be reflective of 2021 costs. For explanation see the ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bl](https://data.bls.gov/cgi-bin/surveymost?bl)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 49
 New per year 0

Table 47. C
Underg

\$80,066.00

\$160,083.00

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	

20.70000000000000 wo R&R

Total	\$0
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Values are based on a 10.5% inflation rate between 2017 and 2021, increased by 10.5% to be reflective of 2021 costs. For explanation see ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 11
 New per year 0

Table 47. C
LNG Im

\$17,974.00

\$35,937.00

22.10000000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, increased by 10.5% to be reflective of 2021 costs. For explanation see ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 462
 New per year 0

Table 47. C
Onshore Petr

Cost Categories	

\$754,908.00

\$1,509,354.00

255.30000000000000 wo R&R

Activity	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, and are increased by 10.5% to be reflective of 2021 costs. For explanation of inflation rate, see the following source.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls=U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 162
 New per year 0

Table 47. C
 Ni

\$264,708.00

\$529,254.00

20.80000000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, and are increased by 10.5% to be reflective of 2021 costs. For explanation of inflation rate, see the following source.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls=U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 5
 New per year 0

Table 47. C

\$8,170.00

 \$16,335.00
 18.7750000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, which was increased by 10.5% to be reflective of 2021 costs. For explanation see the ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

Existing 365
 New per year 0

Table 47. C
 Onshore Petroleum

\$596,410.00

 \$1,192,455.00
 53.4000000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021, which was increased by 10.5% to be reflective of 2021 costs. For explanation see the ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%

Existing 50
 New per year 0

Table 47. C
Natural Gas

\$81,700.00

 \$163,350.00
 18.1000000000000 wo R&R

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	
Recordkeeping	\$0	
Travel	\$0	
Sampling Costs	\$0	
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021. All costs were increased by 10.5% to be reflective of 2021 costs. For explanation see Appendix A.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bl](https://data.bls.gov/cgi-bin/surveymost?bl)
 U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%

Existing 129
 New per year 0

Table 47. C
Offshore Petroleum

\$85,271.58 0

Activity	Cost Categories	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing	\$0	

\$118,422.00

\$210,786.00

8.90000000000000 wo R&R

Recordkeeping	\$0
Travel	\$0
Sampling Costs	\$0
Total	\$0

Values are based on a 10.5% inflation rate between 2017 and 2021, which was increased by 10.5% to be reflective of 2021 costs. For explanation, see the ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bl](https://data.bls.gov/cgi-bin/surveymost?bl)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 is 10.54%.

466.9

\$3,727,928.00

\$7,427,589.00

Burden - Lawyer (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents
4,676	273,653	\$30,223,171.41	\$ -	\$ 24,410,343	\$ 54,633,514	2,338

Capital and O&M Costs: Subpart W
Core Natural Gas Processing reporters

		Total Reporter Cost per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$125	\$0	\$125
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$23,468	\$0	\$23,468
\$0	\$23,648	\$0	\$23,648

2021. O&M values from the 2019 ICR (based on 2017 values) were
 tion of methodologies used to determine costs, please refer to the 2019

^s
 All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W
atural Gas Transmission Compression reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$16,250	\$0	\$16,250
\$0	\$16,305	\$0	\$16,305

2021. O&M values from the 2019 ICR (based on 2017 values) were
tion of methodologies used to determine costs, please refer to the 2019

⁵
All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W
ground Natural Gas Storage reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$30,481	\$0	\$30,481

	\$0	\$30,536	\$0	\$30,536
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2021. O&M values from the 2019 ICR (based on 2017 values) were
 tion of methodologies used to determine costs, please refer to the 2019

^s
 All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W
Import and Export Equipment Reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$21,585	\$0	\$21,585
\$0	\$21,640	\$0	\$21,640

2021. O&M values from the 2019 ICR (based on 2017 values) were
 tion of methodologies used to determine costs, please refer to the 2019

^s
 All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W
Petroleum and Natural Gas Production Reporters

		Total Reporting per Reporter Cost (2021\$)	

Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$127	\$0	\$127
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$182	\$0	\$182

2021. O&M values from the 2019 ICR (based on 2017 values) were
tion of methodologies used to determine costs, please refer to the 2019

⁵
All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W
atural Gas Distribution reporters

			Total Reporting per Reporter Cost (2021\$)
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$7,036	\$0	\$7,036
\$0	\$7,091	\$0	\$7,091

2021. O&M values from the 2019 ICR (based on 2017 values) were
tion of methodologies used to determine costs, please refer to the 2019

⁵
All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W

LNG Storage reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$6,056	\$0	\$6,056
\$0	\$6,111	\$0	\$6,111

2021. O&M values from the 2019 ICR (based on 2017 values) were
 tion of methodologies used to determine costs, please refer to the 2019

⁵
 All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W

and Natural Gas Gathering and Boosting reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$148	\$0	\$148
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$203	\$0	\$203

2021. O&M values from the 2019 ICR (based on 2017 values) were
 tion of methodologies used to determine costs, please refer to the 2019

Capital and O&M Costs: Subpart W

Oil and Natural Gas Transmission Pipeline reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55

2021. O&M values from the 2019 ICR (based on 2017 values) were adjusted for inflation using the Consumer Price Index (CPI-U) for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0. For information on the methodologies used to determine costs, please refer to the 2019

5
All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 and 2021 = 10.54%, rounded to 10.5%

Capital and O&M Costs: Subpart W

Oil and Natural Gas Production reporters

		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0

\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55

2021. O&M values from the 2019 ICR (based on 2017 values) were
tion of methodologies used to determine costs, please refer to the 2019

⁵
All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Year 3							
Responses/ Respondent	Total Responses	Burden - Technician (hrs)	Burden - Engineer (hrs)	Burden - Middle Manager (hrs)	Burden - Senior Manager (hrs)	Burden - Lawyer (hrs)	Total Burden (hrs)
3,294	7,701,372	11,847	229,145	20,925	7,061	4,676	273,653

Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technician (hrs)
\$30,223,171.41	\$ -	\$ 24,410,343	\$ 54,633,514	2,338	3,294	7,701,372	11,847

Annual Average								
Burden - Engineer (hrs)	Burden - Middle Manager (hrs)	Burden - Senior Manager (hrs)	Burden - Lawyer (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
229,145	20,925	7,061	4,676	273,653	\$30,223,171.41	\$ -	\$ 24,410,343	\$ 54,633,514

Total for 3 year period

\$ 163,900,543

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
Petrochemical Prod.	85	672.00	57,120.00	10,892.00	639.00	995.00	170.00	12,696.00	\$915,951.78	\$ -	\$148,847.00

Table 46. Labor Costs: Subpart X (CEMS)

Activity	Labor Rates (per hour)										Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Industrial Engineer/ Technician		Administrative Support					
	\$114.80		\$91.33		\$73.83		\$34.09					
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
Planning	0	2	0	0	0	6	0	1	\$0	\$720		
QA/QC	0	0	0	1	0	13	0	1	\$0	\$1,088		
Recordkeeping	0	0	0	1	0	13	0	1	\$0	\$1,085		
Sampling and Analysis (Calculations)	0	0	0	0	0	3	0	0	\$0	\$270		
Reporting	0	0	0	2	0	26	0	2	\$0	\$2,170		
Total	0	2	0	4	0	62	0	5	\$0	\$5,334		

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart X (CEMS)

Activity	Cost Categories				Total Reporting per Reporter Cost (2021\$)	
	Capital Cost (2006\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

Activity	Capital Cost (2006\$)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

\$220

Equipment (selection, purchase, installation)	\$0
Performance testing	\$0
Recordkeeping	\$0
Travel	\$0
Sampling Costs	\$0
Total	\$0

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Values are based on a 10.5% inflation rate b 10.5% to be reflective of 2021 costs. For ex Source of inflation values: [data/bls.gov/cgi-t](https://data.bls.gov/cgi-t) U.S. Bureau of Labor Statistics-Top Picks-Pri 2017 Average CPI = 245.120; 2021 Average ($270.970/245.120 = 1.1054$, thus the inflator

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$1,064,798.78

Existing facilities

4

4

4

\$21,336.00

le 47. Capital and O

Cos

Equipment Lifetime

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2									
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 (\$)
85.00	672.00	57,120.00	10,892.00	639.00	995.00	170.00	12,696.00	\$915,951.78	\$ -

Table 46. Labor Costs: Subpart X (mass balance)

Activity	Labor Rates (per hour)							
	Lawyer		Industrial Manager		Industrial Engineer/ Technician		Administrative Support	
	\$114.80		\$91.33		\$73.83			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	
Planning	16	2	1	0	18	6	2	
QA/QC	0	0	5	2	105	35	10	
Recordkeeping	0	0	1	1	13	13	1	
Sampling and Analysis (Calculations)	0	0	6	2	120	40	12	
Reporting	0	0	2	2	26	26	2	
Total	16	2	15	7	281	120	27	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

new sources 0

O&M Costs: Subpart X (mass balance)

Cost Categories		Total Reporting per Reporter Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

Table 47. Capital and O&M Costs: Subpart X (opt)

Activity	Cost Categories		
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021/year)

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	\$0	\$0	\$0	\$0
	\$0	\$0	\$0	\$0
	\$0	\$55	\$55	\$55
	\$0	\$0	\$0	\$0
	\$0	\$0	\$0	\$0
	\$0	\$55	\$55	\$55

0
\$2,915

Equipment (selection, purchase, installation)	\$0	0	\$0
Performance testing	\$0	0	\$0
Recordkeeping	\$0	0	\$0
Travel	\$0	0	\$0
Sampling Costs	\$0	0	\$0
Total	\$0		\$0

1. O&M values from the 2019 ICR (based on 2017 values) were increased by methodologies used to determine costs, please refer to the 2019 ICR.

Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

and 2021 = 10.54%, rounded to 10.5%

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine inflation values, please refer to the 2019 ICR.
Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

		Year 3											
O&M Cost (\$)	Total Cost (\$)	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 (\$)
\$148,847.00	\$1,064,798.78	85.00	672.00	57,120.00	10,892.00	639.00	995.00	170.00	12,696.00	\$915,951.78	\$ -	\$148,847.00	\$1,064,798.78

		Existing facilities
Port	Labor Cost per Year per Reporting Unit/Facility	53
\$34.09		53
		53
Subseq. Year	Initial Year	Subseq. Year
1	\$3,309	\$720
3	\$8,565	\$2,855
1	\$1,085	\$1,085
4	\$9,792	\$3,264
2	\$2,170	\$2,170
11	\$24,922	\$10,095

\$535,035.00

Table 46. Labor Costs: Subpart X (optional combustion methodolc

Activity	Labor Rates (per hour)						
	Lawyer		Industrial Manager		Industrial Engineer/ Technician		Administrative Support
	\$114.80	\$91.33	\$73.83				
Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	
Planning	16	2	1	0	18	6	2
QA/QC	0	0	2	1	46	15	5
Recordkeeping	0	0	1	1	13	13	1
Sampling and Analysis (Calculations)	0	0	14	5	278	93	28
Reporting	0	0	2	2	26	26	2
Total	16	2	20	9	381	153	37

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporti

new sources 0

ional combustion)

Total Reporting per Unit/Facility Cost (2021\$)		
O&M Costs (2021\$/year)	Initial Year	Subseq. Years

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

	\$0	\$0	\$0
	\$0	\$0	\$0
	\$55	\$55	\$55
	\$0	\$0	\$0
	\$5,149	\$5,149	\$5,149
	\$5,204	\$5,204	\$5,204
			\$145,712

he 2019 ICR (based on 2017 values) were increased
mine costs, please refer to the 2019 ICR.

I-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

inded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average											
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 (\$)
85.00	672.00	57,120.00	10,892.00	639.00	995.00	170.00	12,696.00	\$915,951.78	\$ -	\$148,847.00	\$1,064,798.78

Total for 3 year period

\$ 3,194,396

ve		Existing facilities	
Subseq. Year	Initial Year	Subseq. Year	
			28
			28
			28
			0
14	\$33,045	\$12,803	\$358,484.00

ng, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1											
	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 (\$)
Y. Petroleum Refineries	134.00	173.00	23,182.00	5,994.98	600.02	600.02	268.00	7,463.02	\$548,629.91	\$ -	\$7,370.00	\$555,999.91

Table 46a. Labor Costs: Subpart Y (small topping refinery)

Activity	Labor Rates (per hour)										Labor Cost per Year per Reporting Unit/Facility
	Lawyer		Industrial Manager		rial Engineer/Tech		Adminstrative Support				
	\$114.80		\$91.33		\$73.83		\$34.09				
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	2	0	0.2	0	2	0	0.2	\$0	\$402	
QA/QC	0	0	0	0.4	0	4	0	0.4	\$0	\$345	
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432	
Sampling and Analysis (Calculations)	0	0	0	0.3	0	3	0	0.3	\$0	\$259	
Reporting	0	0	0	1	0	10	0	1	\$0	\$864	
Total	0	2	0	2.4	0	24	0	2.4	\$0	\$2,303	

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Table 46b. Labor Costs: Subpart Y (asphalt topping refinery)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer				Engineer/Technician					
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.2	0	2	0	0.2	\$0	\$402
QA/QC	0	0	0	0.4	0	4	0	0.4	\$0	\$345
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.55	0	5.5	0	0.55	\$0	\$475
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	2.65	0	26.5	0	2.65	\$0	\$2,518

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Table 46c. Labor Costs: Subpart Y (medium topping refinery)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer				Engineer/Technician					
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.2	0	2	0	0.2	\$0	\$402
QA/QC	0	0	0	0.4	0	4	0	0.4	\$0	\$345
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.7	0	7	0	0.7	\$0	\$605
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	2.8	0	28	0	2.8	\$0	\$2,648

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Table 46d. Labor Costs: Subpart Y (small hydroskimming refinery)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.4	0	4	0	0.4	\$0	\$575
QA/QC	0	0	0	0.4	0	4	0	0.4	\$0	\$345
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.43	0	4.25	0	0.43	\$0	\$367
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	2.73	0	27.25	0	2.73	\$0	\$2,583

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

2

Table 46e. Labor Costs: Subpart Y (medium hydroskimming refinery)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.4	0	4	0	0.4	\$0	\$575
QA/QC	0	0	0	0.4	0	4	0	0.4	\$0	\$345
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.83	0	8.25	0	0.83	\$0	\$713
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	3.13	0	31.25	0	3.13	\$0	\$2,929

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Table 46f. Labor Costs: Subpart Y (very small upgrading refinery)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.4	0	4	0	0.4	\$0	\$575

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QA/QC	0	0	0	0.8	0	8	0	0.8	\$0	\$691
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.53	0	5.25	0	0.53	\$0	\$453
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	3.23	0	32.25	0	3.23	\$0	\$3,015

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

2

Table 46g. Labor Costs: Subpart Y (small upgrading refinery)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Engineer/Technician		Administrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.6	0	6	0	0.6	\$0	\$748
QA/QC	0	0	0	0.6	0	6	0	0.6	\$0	\$518
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.68	0	6.75	0	0.68	\$0	\$583
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	3.38	0	33.75	0	3.38	\$0	\$3,145

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Table 46h. Labor Costs: Subpart Y (medium upgrading refinery)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Engineer/Technician		Administrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.8	0	8	0	0.8	\$0	\$921
QA/QC	0	0	0	1.2	0	12	0	1.2	\$0	\$1,036
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	0.83	0	8.25	0	0.83	\$0	\$713
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	4.33	0	43.25	0	4.33	\$0	\$3,965

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Table 46i. Labor Costs: Subpart Y (medium upgrading refinery with loading)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	0.8	0	8	0	0.8	\$0	\$921
QA/QC	0	0	0	0.92	0	9.2	0	0.92	\$0	\$795
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	1.76	0	17.6	0	1.76	\$0	\$1,520
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	4.98	0	49.8	0	4.98	\$0	\$4,531

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

7

Table 46j. Labor Costs: Subpart Y (large upgrading refinery with CEMS)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	1.2	0	12	0	1.2	\$0	\$1,266
QA/QC	0	0	0	2.48	0	24.8	0	2.48	\$0	\$2,142
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	1.8	0	17.95	0	1.8	\$0	\$1,550
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	6.98	0	69.75	0	6.98	\$0	\$6,254

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

23

Table 46k. Labor Costs: Subpart Y (large upgrading refinery with calciner)

Activity	Labor Rates (per hour)				Engineer/Technician				Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		ian		Adminstrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	1.2	0	12	0	1.2	\$0	\$1,266

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QA/QC	0	0	0	2	0	20	0	2	\$0	\$1,727
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	2.39	0	23.875	0	2.39	\$0	\$2,062
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	7.09	0	70.875	0	7.09	\$0	\$6,351

3

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Table 46I. Labor Costs: Subpart Y (very large upgrading refinery)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer		Industrial Manager		Engineer/Technician		Administrative Support			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
	\$114.80		\$91.33		\$73.83		\$34.09			
Planning	0	2	0	1.6	0	16	0	1.6	\$0	\$1,612
QA/QC	0	0	0	3.36	0	33.6	0	3.36	\$0	\$2,902
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0	\$432
Sampling and Analysis (Calculations)	0	0	0	3.02	0	30.15	0	3.02	\$0	\$2,604
Reporting	0	0	0	1	0	10	0	1	\$0	\$864
Total	0	2	0	9.48	0	94.75	0	9.48	\$0	\$8,413

7

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

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Year 2											
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 (\$)
134.00	173.00	23,182.00	5,994.98	600.02	600.02	268.00	7,463.02	\$548,629.91	\$ -	\$7,370.00	\$555,999.91

Existing facilities

134

Table 47. Capital and O&M Costs: Subpart Y

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2006\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
purchase, installation) ^a	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

30.8

³⁰⁸ Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0
2017 Average CPI = 245.120; 2021 Average CPI = 270.970

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$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

33.8 202.8

35.6 178

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34.71 69.42

39.51 316.08

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40.71 81.42

42.51 1700.4

53.91 1132.11

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61.76 432.32

85.71 1971.33

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87.055 261.165

115.71 809.97

7463.015

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Year 3												No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)
134.00	173.00	23,182.00	5,994.98	600.02	600.02	268.00	7,463.02	\$548,629.91	\$ -	\$7,370.00	\$555,999.91	134.00	173.00	23,182.00	5,994.98

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Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average							
Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
600.02	600.02	268.00	7,463.02	\$548,629.91	\$ -	\$7,370.00	\$555,999.91

Total for 3 year period
\$ 1,668,000

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

9

2021

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$495.00	\$7,208.19

	Existing facilities
	\$9
per Year per Init/Facility	\$9
Subseq. Year	9
\$115	
\$0	
\$210	
\$0	
\$421	
\$746	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
9.00	100.00	900.00	54.00	13.50	13.50	9.00	90.00	\$6,713.19	\$ -	\$495.00	\$7,208.19	9.00	100.00	900.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
54.00	13.50	13.50	9.00	90.00	\$6,713.19	\$ -	\$495.00	\$7,208.19	9.00	100.00	900.00	54.00	13.50	13.50	9.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
90.00	\$6,713.19	\$ -	\$495.00	\$7,208.19

Total for 3 year period

\$ 21,625

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
Pulp & Paper Mnfctrng	103.00	105.00	10,815.00	2,338.10	370.80	164.80	51.50	2,925.20	\$218,017.32	\$ -

Table 46. Labor Costs: Subpart AA

Activity	Labor Rates (per hour)								Labor Cost p Reporting U
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Adminstrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Year	Year	
Planning	0	0.5	0	0.1	0	1	0	0.1	\$0
QA/QC	0	0	0	1	0	2.3	0	0	\$0
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	1	0	4.4	0	0	\$0
Reporting	0	0	0	1	0	10	0	1	\$0
Total	0	0.5	0	3.6	0	22.7	0	1.6	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart AA

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Existing facilities

103

2021

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation) ^a	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	0	\$0	\$55		\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs ^b	\$0	0	\$0	\$212		\$212
Total	\$0		\$0	\$267	\$0	\$267

103 **2022**

103 **2023**

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$27,501.00	\$245,518.32

Year	Existing facilities
\$144	\$103
\$261	\$103
\$432	103
\$416	
\$864	
\$2,117	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
103.00	105.00	10,815.00	2,338.10	370.80	164.80	51.50	2,925.20	\$218,017.32	\$ -	\$27,501.00	\$245,518.32	103.00	105.00	10,815.00

2021
2022
2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
2,338.10	370.80	164.80	51.50	2,925.20	\$218,017.32	\$ -	\$27,501.00	\$245,518.32	103.00	105.00	10,815.00	2,338.10	370.80	164.80	51.50

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
2,925.20	\$218,017.32	\$ -	\$27,501.00	\$245,518.32

Total for 3 year period

\$ 736,555

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
BB: Silicon Carbide Production	1.00	10.00	10.00	9.00	2.50	3.50	0.25	15.25	\$1,040.81	\$ -

Table 46. Labor Costs: Subpart BB

Activity	Labor Rates (per hour)								Labor Cost Reporting
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	0.25	0	0.5	0	1	0	1	\$0
QA/QC	0	0	0	0.5	0	1	0	1	\$0
Recordkeeping	0	0	0	0.5	0	2	0	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	0	0	1	0	0	\$0
Reporting	0	0	0	1	0	4	0	1	\$0
Total	0	0.25	0	2.5	0	9	0	3.5	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart BB

Existing facilities

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	NA	\$0	\$0	\$0	\$0
Performance testing		NA	\$0	\$0	\$0	\$0
Recordkeeping	\$0		\$0	\$55	\$0	\$55
Travel	\$0	NA	\$0	\$0	\$0	\$0
Sampling Costs	\$0	NA	\$0	\$198	\$0	\$198
Total	\$0	\$0	\$0	\$253	\$0	\$253

1 2021
1 2022
1 2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$253.00	\$1,293.81

	Existing facilities
	\$1
Cost per Year per Unit/Facility	\$1
	1
Subseq. Year	
\$182	
\$154	
\$210	
\$74	
\$421	
\$1,041	

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)			
1.00	10.00	10.00	9.00	2.50	3.50	0.25	15.25	\$1,040.81	\$ -	\$253.00	\$1,293.81	1.00	10.00	10.00

2021

2022

2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
9.00	2.50	3.50	0.25	15.25	\$1,040.81	\$ -	\$253.00	\$1,293.81	1.00	10.00	10.00	9.00	2.50	3.50	0.25

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
15.25	\$1,040.81	\$ -	\$253.00	\$1,293.81

Total for 3 year period

\$ 3,881

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
CC- Soda Ash Manufacturing	4.00	28.00	112.00	24.10	6.50	6.00	0.00	36.60	\$2,577.49

Table 46. Labor Costs: Subpart CC--trona input method

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.5
Sampling and Analysis (Calculations)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	1.0
Total	0.0	0.0	0.0	1.5	0.0	6.0	0.0	1.5

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart CC -trona input method

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$2,228.00	\$4,805.49

		Existing facilities
		3
Labor Cost per Year per Reporting Unit/Facility		3
		3
Initial Year	Subseq. Year	
\$0	\$0	
\$0	\$0	
\$0	\$210	
\$0	\$0	
\$0	\$421	
\$0	\$631	

Table 47. Capital and O&M C

	Cost Ca
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Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	0
Performance testing	\$0	0
Recordkeeping	\$0	\$0
Travel	\$0	0
Sampling Costs	\$0	0
Total	\$0	\$0

Values are based on a 10.5% inflation rate between 2017 and by 10.5% to be reflective of 2021 costs. For explanation of the Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bl](https://data.bls.gov/cgi-bin/surveymost?bl)
U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 20

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2									
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 (\$)
4.00	28.00	112.00	24.10	6.50	6.00	0.00	36.60	2,577.49	\$0.00

Table 46. Labor Costs: Subpart CC--soda ash output method

2021 2022 2023	Activity	Labor Rates (per hour)							
		Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative \$34.10	
		Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	
	Planning	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	QA/QC	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Recordkeeping	0.0	0.0	0.0	0.5	0.0	2.0	0.0	0.0
	Sampling and Analysis (Calculations)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Reporting	0.0	0.0	0.0	1.0	0.0	4.0	0.0	0.0
	Total	0.0	0.0	0.0	1.5	0.0	6.0	0.0	0.0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Costs: Subpart CC - soda ash output method

Categories	Total Reporting per Unit/Facility Cost (2021\$)
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Table 47. Capital and O&M Costs: Subpart CC - site spe

Cost Categories

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$55	\$0	\$55

2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

5 All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

17 and 2021 = 10.54%, rounded to 10.5%

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)
Equipment (selection, purchase, installation)	\$0	0	\$0
Performance testing	\$0	0	\$0
Recordkeeping	\$0	\$0	\$0
Travel ^b	\$0	0	\$0
Sampling Costs	\$0	0	\$0
Total	\$0		\$0

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from 2017 are increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR. Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls) U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0 2017 Average CPI = 245.120; 2021 Average CPI = 270.970 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

O&M Costs (2017\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0
\$2,008	\$0	\$2,008
\$0	\$0	\$0
\$0	\$0	\$0
\$0	\$0	\$0
\$2,008	\$0	\$2,008

the 2019 ICR (based on 2017 values) were increased by
 ine costs, please refer to the 2019 ICR.

PI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

unded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

		Annual Average											
O&M Cost (\$)	Total Cost (\$)	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 (\$)
\$ 2,228.00	\$4,805.49	4.00	28.00	112.00	24.10	6.50	6.00	0.00	36.60	\$2,577.49	\$ -	\$2,228.00	\$4,805.49

site specific EF method

Operational Technician 0.83	Administrative Support \$34.09		Labor Cost per Year per Reporting Unit/Facility	
	Subseq. Year	Initial Year	Subseq. Year	Initial Year
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0.1	0	0	\$0
	0	0	0	\$0
	0.1	0	0	\$53

Existing facilities

\$1	\$2,021
\$1	\$2,022
1	2023

reporting, are based on 2019 ICR

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 14,416

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	90.00	206.00	18,540.00	2,790.00	405.00	495.00	90.00	3,780.00	\$270,180.90	\$ -

Table 1. Labor Costs: Subpart DD

Activity	Labor Rates (per hour)								Labor Co Reportin
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	1	0	1	0	2	0	0	\$0
QA/QC	0	0	0	0	0	2	0	0	\$0
Recordkeeping	0	0	0.5	0.5	5	5	0.5	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	2	0	12	0	4	\$0
Reporting	0	0	1	1	10	10	1	1	\$0
Total	0	1	1.5	4.5	15	31	1.5	5.5	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 2. Capital and O&M Costs: Subpart DD

Existing
facilities

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)					\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs				\$1,326	\$0	\$1,326
Total	\$0		\$0	\$1,381	\$0	\$1,381

90 \$2,021

90 2022

90 2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$124,290.00	\$394,470.90

	Existing facilities
Cost per Year per g Unit/Facility	\$90
Subseq. Year	\$90
\$354	
\$148	
\$432	
\$1,205	
\$864	
\$3,002	

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
90.00	206.00	18,540.00	2,790.00	405.00	495.00	90.00	3,780.00	\$270,180.90	\$ -	\$124,290.00	\$394,470.90	90.00	206.00	18,540.00

2021

2022

2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
2,790.00	405.00	495.00	90.00	3,780.00	\$270,180.90	\$ -	\$124,290.00	\$394,470.90	90.00	206.00	18,540.00	2,790.00	405.00	495.00	90.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
3,780.00	\$270,180.90	\$ -	\$124,290.00	\$394,470.90

Total for 3 year period

\$ 1,183,413

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
EE: Titanium Dioxide Production	6.00	76.00	456.00	54.00	15.00	21.00	1.50	91.50	\$6,244.86

from https://usepa.sharepoint.com/:x:/r/sites/oar_Work/GHGRP/Shared%20Documents/ICR%20Renewal/Subpart%20Testing%20Monitoring%20Calcu

Table 46. Labor Costs: Subpart EE

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	0.25	0	0.5	0	1	0	1
QA/QC	0	0	0	0.5	0	1	0	1
Recordkeeping	0	0	0	0.5	0	2	0	0.5
Sampling and Analysis (Calculations)	0	0	0	0	0	1	0	0
Reporting	0	0	0	1	0	4	0	1
Total	0	0.25	0	2.5	0	9	0	3.5

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart EE

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)		Existing facilities	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
							6	2021
							6	2022

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)	\$0	NA	\$0	\$0	\$0	\$0
Performance testing		NA	\$0	\$0	\$0	\$0
Recordkeeping	\$0		\$0	\$55	\$0	\$55
Travel	\$0	NA	\$0	\$0	\$0	\$0
Sampling Costs	\$0	NA	\$0	\$396	\$0	\$396
Total	\$0		\$0	\$451	\$0	\$451

6

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.
 Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$2,706.00	\$8,950.86

[ation%20Costs/EE_batch_3_ICR_costs.xls?d=](#)

Labor Cost per Year per Reporting Unit/Facility		Existing facilities
Initial Year	Subseq. Year	
\$0	\$182	\$6
\$0	\$154	\$6
\$0	\$210	6
\$0	\$74	
\$0	\$421	
\$0	\$1,041	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2														
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
6.00	76.00	456.00	54.00	15.00	21.00	1.50	91.50	\$6,244.86	\$ -	\$2,706.00	\$8,950.86	6.00	76.00	456.00

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2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
54.00	15.00	21.00	1.50	91.50	\$6,244.86	\$ -	\$2,706.00	\$8,950.86	6.00	76.00	456.00	54.00	15.00	21.00	1.50

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
91.50	\$6,244.86	\$ -	\$2,706.00	\$8,950.86

Total for 3 year period

\$ 26,853

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
Underground Coal Mines	78	1,614.00	125,892.00	4,990.00	240.00	180.00	0.00	5,410.00	\$396,467.10	\$ -

Table 46a. Labor Costs: Subpart FF: Ventilation Emission Calculations

Activity	Labor Rates (per hour)								Labor Cos Reporting	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support			
	\$114.80		\$91.33		\$73.83		\$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		Initial Year
Planning	0	0	0	0	0	0	0	0	0	\$0
QA/QC	0	0	0	0	0	0	0	0	0	\$0
Recordkeeping	0	0	0	1	0	13	0	1	0	\$0
Sampling and Analysis (Calculations)	0	0	0	1	0	3	0	0	0	\$0
Reporting	0	0	0	2	0	26	0	2	0	\$0
Total	0	0	0	4	0	42	0	3	0	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Table 46b. Labor Costs: Subpart FF: Degas Emissions Calculations

Activity	Labor Rates (per hour)								Labor Cos Reporting	
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support			
	\$114.80		\$91.33		\$73.83		\$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		Initial Year
Planning	0	0	0	0	0	0	0	0	0	\$0
QA/QC	0	0	0	0	0	0	0	0	0	\$0
Recordkeeping	0	0	0	0	0	0	0	0	0	\$0
Sampling and Analysis (Calculations)	0	0	0	0	0	130	0	0	0	\$0
Reporting	0	0	0	0	0	0	0	0	0	\$0
Total	0	0	0	0	0	130	0	0	0	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$66,285.00	\$462,752.10

Cost per Year per Unit/Facility	Subseq. Year
	\$0
	\$0
	\$1,085
	\$313
	\$2,170
	\$3,568

Existing facilities 60

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

t per Year per Unit/Facility
Subseq. Year
\$0
\$0
\$0
\$9,598
\$0
\$9,598

Existing
facilities 19

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
78	1,614.00	125,892.00	4,990.00	240.00	180.00	0.00	5,410.00	\$396,467.10	\$ -	\$66,285.00	\$462,752.10

Table 47a. Capital and O&M Costs: Subpart FF Ventilation Emission Calculations

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance Testing	-		\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Table 47b. Capital and O&M Costs: Subpart FF Degas Emissions Calculations

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	-	\$0	\$0	\$0	\$0
Performance Testing	-	-	\$0	\$3,315	\$0	\$3,315
Recordkeeping	\$0	-	\$0	\$0	\$0	\$0
Travel	\$0	-	\$0	\$0	\$0	\$0
Sampling Costs	\$0	-	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$3,315	\$0	\$3,315

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR00005A0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3															
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)
78	1,614.00	125,892.00	4,990.00	240.00	180.00	0.00	5,410.00	\$396,467.10	\$ -	\$66,285.00	\$462,752.10	78	1,614.00	125,892.00	4,990.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average							
Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
240.00	180.00	0.00	5,410.00	\$396,467.10	\$ -	\$66,285.00	\$462,752.10

Total for 3 year period

\$ 1,388,256

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
GG. Zinc Production	5.00	44.00	220.00	120.00	16.50	12.00	10.00	158.50	\$11,923.63	\$ -

Table 46. Labor Costs: Subpart GG

Activity	Labor Rates (per hour)								Labor Cost Reporting U
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	
Planning	0	1	0	0.5	0	5	0	0.25	\$0
QA/QC	0	1	0	0.3	0	3	0	0.15	\$0
Recordkeeping	0	0	0	0.5	0	2	0	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	1	0	10	0	0.5	\$0
Reporting	0	0	0	1	0	4	0	1	\$0
Total	0	2	0	3.3	0	24	0	2.4	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart GG

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Existing facilities

5

2021

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$1,492	\$0	\$1,492
Total	\$0		\$0	\$1,547	\$0	\$1,547

5 2022

5 2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$7,735.00	\$19,658.63

	Existing facilities
	\$5
per Year per Init/Facility	\$5
	5
Subseq. Year	
\$538	
\$369	
\$210	
\$847	
\$421	
\$2,385	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
5.00	44.00	220.00	120.00	16.50	12.00	10.00	158.50	\$11,923.63	\$ -	\$7,735.00	\$19,658.63	5.00	44.00	220.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
120.00	16.50	12.00	10.00	158.50	\$11,923.63	\$ -	\$7,735.00	\$19,658.63	5.00	44.00	220.00	120.00	16.50	12.00	10.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
158.50	\$11,923.63	\$ -	\$7,735.00	\$19,658.63

Total for 3 year period

\$ 58,976

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
HH. Landfills	1,127.00	514.00	579,278.00	58,807.00	5,635.00	6,762.00	1,127.00	72,331.00	\$5,216,261.54	\$ -

Table 46. Labor Costs: Subpart HH (GCS)

Activity	Labor Rates (per hour)								Labor Cost per Reporting Unit
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support		
	First Year	Subseq. Year	First Year	Subseq. Year	First Year	Subseq. Year	First Year	Subseq. Year	
	\$114.80		\$91.33		\$73.83		\$34.09		
Planning	2	1	1	1	21	1	2	1	\$1,940
QA/QC	0	0	1	1	13	6	1	1	\$1,085
Recordkeeping	0	0	1	1	13	13	1	1	\$1,085
Sampling and Analysis (Calculations)	0	0	1	0	16	8	2	1	\$1,341
Reporting	0	0	2	2	26	26	2	2	\$2,170
Total	2	1	6	5	89	54	8	6	\$7,621

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR EPA ICR No. 2300.18)

	2021	2022	2023
new sources	0	0.0	0.0

Table 47. Capital and O&M Costs: Subpart HH (with GCS)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	First Year	Subseq. Years	
Equipment (selection, purchase, installation)	\$0	15	\$0	\$0	\$0	\$0	
Performance testing	\$0		\$0	\$0	\$0	\$0	
Recordkeeping	\$0		\$0	\$55	\$55	\$55	\$ -
Travel	\$0		\$0	\$0	\$0	\$0	
Sampling Costs	\$0		\$0	\$2,309	\$2,309	\$2,309	
Total	\$0		\$0	\$2,364	\$2,364	\$2,364	\$ 1,971,576

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$1,987,691.00	\$7,203,952.54

	Existing facilities
	834
per Year per Unit/Facility	834
	834
Subseq. Year	
\$314	
\$568	
\$1,085	
\$625	\$0.00
\$2,170	
\$4,763	\$3,972,342

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2										
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 (\$)
1,127.00	514.00	579,278.00	58,807.00	5,635.00	6,762.00	1,127.00	72,331.00	\$5,216,261.54	\$ -	\$1,987,691.00

Table 46. Labor Costs: Subpart HH (No GCS)

\$2,021	Labor Rates (per hour)									
\$2,022	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support			
\$2,023	\$114.80		\$91.33		\$73.83		\$34.09			
	Activity	First Year	Subseq. Year	First Year	Subseq. Year	First Year	Subseq. Year	First Year	Subseq. Year	
	Planning	2	1	1	1	12	1	2	1	
	QA/QC	0	0	1	1	8	3	1	1	
	Recordkeeping	0	0	1	1	13	13	1	1	
	Sampling and Analysis (Calculations)	0	0	1	0	8	4	2	1	
	Reporting	0	0	2	2	26	26	2	2	
	Total	2	1	6	5	67	47	8	6	
	Labor rates are obtained from appendix D-1 - Respondent Labor Rates									
	Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR									
		2021	2022	2023						
	new sources	0	0.0	0.0						

Table 47. Capital and O&M Costs: Subpart HH (without GCS)

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)
------------------------	--

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	First Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0		\$0	\$0	\$0	\$0
Performance testing	\$0		\$0	\$0	\$0	\$0
Recordkeeping	\$0		\$0	\$55	\$55	\$55
Travel	\$0		\$0	\$0	\$0	\$0
Sampling Costs	\$0		\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$55	\$55

\$ 16,115

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Cost (\$)	Year 3											No. 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 (\$)
\$7,203,952.54	1,127.00	514.00	579,278.00	58,807.00	5,635.00	6,762.00	1,127.00	72,331.00	\$5,216,261.54	\$ -	\$1,987,691.00	\$7,203,952.54	1,127.00

Labor Cost per Year per Reporting Unit/Facility			
First Year	Subseq. Year		
\$1,275	\$314		
\$716	\$347		
\$1,085	\$1,085		
\$750	\$329	\$0.00	
\$2,170	\$2,170		
\$5,997	\$4,246	\$1,244,078.00	

Existing facilities

\$293 \$2,021
\$293 \$2,022
\$293 \$2,023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average										
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 (\$)
514.00	579,278.00	58,807.00	5,635.00	6,762.00	1,127.00	72,331.00	\$5,216,261.54	\$ -	\$1,987,691.00	\$7,203,952.54

Total for 3 year period

\$ 21,611,858

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
II. Wastewater	114.00	437.00	49,818.00	2,850.00	421.80	193.80	114.00	3,579.60	\$268,632.34	\$ -

Table 1. Labor Costs: Subpart II

Activity	Labor Rates (per hour)								Labor Cost Reporting
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Year	Subseq. Year	
Planning	2	1	0.2	0.1	2	1	0.2	0.1	\$402
QA/QC	0	0	0.2	0.1	2	1	0.2	0.1	\$173
Recordkeeping	0	0	0.5	0.5	5	5	0.5	0.5	\$432
Sampling and Analysis (Calculations)	0	0	2	2	8	8	0	0	\$773
Reporting	0	0	1	1	10	10	1	1	\$864
Total	2	1	3.9	3.7	27	25	1.9	1.7	\$2,644

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 2. Capital and O&M Costs: Subpart II

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)		114	2021
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
							114	2022

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$1,307	\$1,307	\$1,307
Total	\$0		\$0	\$1,362	\$1,362	\$1,357

114

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$154,698.00	\$423,330.34

Cost per Year per mg Unit/Facility	Existing facilities
	\$114
	\$114
	114
Subseq. Year	
\$201	
\$86	
\$432	
\$773	
\$864	
\$2,356	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)			
114.00	437.00	49,818.00	2,850.00	421.80	193.80	114.00	3,579.60	\$268,632.34	\$ -	\$154,698.00	\$423,330.34	114.00	437.00	49,818.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual Average						
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)
2,850.00	421.80	193.80	114.00	3,579.60	\$268,632.34	\$ -	\$154,698.00	\$423,330.34	114.00	437.00	49,818.00	2,850.00	421.80	193.80	114.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
3,579.60	\$268,632.34	\$ -	\$154,698.00	\$423,330.34

Total for 3 year period

\$ 1,269,991

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
LL Suppliers of Coal-based Liquid Fuels	1.00	2.00	2.00	15.25	1.97	2.43	2.00	21.65	\$1,618.27

Table 46. Labor Costs: Subpart LL (per average coal liquids supplier)

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	2	0	0.2	0	4	0	0.4
QA/QC	0	0	0	0.2	0	4	0	0.4
Recordkeeping	0	0	0	0.5	0	2	0	0.5
Sampling and Analysis (Calculations)	0	0	0	0.07	0	1.25	0	0.13
Reporting	0	0	0	1	0	4	0	1
Total	0	2	0	1.97	0	15.25	0	2.43

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart LL

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55

Existing facilities

1 2021
1 2022
1 2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$55.00	\$1,673.27

Labor Cost per Year per Reporting Unit/Facility		Existing facilities
Initial Year	Subseq. Year	
\$0	\$557	\$1
\$0	\$327	\$1
\$0	\$210	1
\$0	\$103	
\$0	\$421	
\$0	\$1,618	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
1.00	2.00	2.00	15.25	1.97	2.43	2.00	21.65	\$1,618.27	\$ -	\$55.00	\$1,673.27

2021
2022
2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Year 3											
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 (\$)
1.00	2.00	2.00	15.25	1.97	2.43	2.00	21.65	\$1,618.27	\$ -	\$55.00	\$1,673.27

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average											
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 (\$)
1.00	2.00	2.00	15.25	1.97	2.43	2.00	21.65	\$1,618.27	\$ -	\$55.00	\$1,673.27

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 5,020

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

238 **2022**

238 **2023**

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$13,090.00	\$690,964.98

	Existing facilities
	\$238
1st Year per Facility	\$238
Subseq. Year	238
\$557	
\$327	
\$432	
\$669	
\$864	
\$2,848	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
238.00	149.00	35,462.00	7,418.46	549.78	742.56	476.00	9,186.80	\$677,874.98	\$ -	\$13,090.00	\$690,964.98	238.00	149.00	35,462.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual					
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
7,418.46	549.78	742.56	476.00	9,186.80	\$677,874.98	\$ -	\$13,090.00	\$690,964.98	238.00	149.00	35,462.00	7,418.46	549.78	742.56

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Average					
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
476.00	9,186.80	\$677,874.98	\$ -	\$13,090.00	\$690,964.98

Total for 3 year period

\$ 2,072,895

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Recordkeeping	\$0	\$0	\$0	\$55	\$55	\$55
Travel					\$0	\$0
Sampling Costs				\$0	\$0	\$0
Total	\$0	\$0	\$0	\$55	\$55	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$609,220.75	\$ -	\$26,620.00	\$635,840.75

			Existing facilities
			119
ive Support			119
.09			119
Labor Cost per Year per Reporting Unit/Facility			
Subseq. Year	Initial Year	Subseq. Year	
0.1	\$623	\$199	
0.2	\$173	\$173	
0.5	\$210	\$210	
0.1	\$295	\$295	
1.0	\$421	\$421	
1.9	\$1,722	\$1,299	

Table 47. Capital and O&M Costs: Subj

Activity	Cost Ca	
	Capital Cost (2021\$)	Equipment Lifetime
Equipment (selection, purchase, installation)	\$0	
Performance testing		

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Recordkeeping	\$0	\$0
Travel		
Sampling Costs		
Total	\$0	

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values are reflective of 2021 costs. For explanation of methodologies used to determine inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)
 U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers
 2017 Average CPI = 245.120; 2021 Average CPI = 270.970
 $270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2								
No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
484.00	64.00	30,976.00	5,407.30	1,355.20	899.57	484.00	8,146.07	\$609,220.75

Table 46. Labor Costs: Subpart NN - Local Distribution Companies

\$2,021
\$2,022
\$2,023

Activity	Labor Rates (per hour)					
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	1.0	1.0	0.6	0.1	6.0	1.0
QA/QC	0.0	0.0	0.2	0.2	2.0	2.0
Recordkeeping	0.0	0.0	0.5	0.5	2.0	2.0
Calculations	0.0	0.0	1.0	1.0	2.0	2.0
Reporting	0.0	0.0	1.0	1.0	4.0	4.0
Total	1.0	1.0	3.3	2.8	16.0	11.0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

new source 0

Subpart NN - Local Distribution Companies (LDCs)

Categories		Total Reporting per Facility Cost (2021\$)	
Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
\$0	\$0	\$0	\$0
		\$0	\$0

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$0	\$55	\$55	\$55
		\$0	\$0
	\$0	\$0	\$0
\$0	\$55	\$55	\$55

Values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be
 e costs, please refer to the 2019 ICR.

sumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

			Yes					
Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
\$ -	\$26,620.00	\$635,840.75	484.00	64.00	30,976.00	5,407.30	1,355.20	899.57

ns (LDCs)

Administrative Support \$34.09		Labor Cost per Year per Reporting Facility	
Initial Year	Subseq. Year	Initial Year	Subseq. Year
0.3	0.1	\$623	\$199
0.2	0.2	\$173	\$173
0.5	0.5	\$210	\$210
0.1	0.1	\$242	\$242
1.0	1.0	\$421	\$421
2.1	1.9	\$1,669	\$1,246

Existing facilities

\$365	\$2,021
\$365	\$2,022
\$365	\$2,023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

r 3								
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses
484.00	8,146.07	\$609,220.75	\$ -	\$26,620.00	\$635,840.75	484.00	64.00	30,976.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average								
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 (\$)
5,407.30	1,355.20	899.57	484.00	8,146.07	\$609,220.75	\$ -	\$26,620.00	\$635,840.75

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 1,907,522

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Subpart OO - Table 46b Importers

Activity	Labor Rates (per hour)							
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
		\$114.80		\$91.33		\$73.83		\$34.09
Planning	0	2	0	1	0	1	0	0
QA/QC	0	0	0	5	0	0	0	0
Recordkeeping	0	0	0	1	0	13	0	1
Sampling and Analysis (Calculations)	0	0	0	0.9	0	18	0	1.8
Reporting	0	0	0	2	0	26	0	2
Total	0	2	0	9.9	0	58	0	4.8

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Subpart OO - Table 46c Exporters

Activity	Labor Rates (per hour)							
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
		\$114.80		\$91.33		\$73.83		\$34.09
Planning	0	2	0	1	0	1	0	0
QA/QC	0	0	0	5	0	0	0	0
Recordkeeping	0	0	0	1	0	13	0	1
Sampling and Analysis (Calculations)	0	0	0	0.9	0	18	0	1.8
Reporting	0	0	0	2	0	26	0	2
Total	0	2	0	9.9	0	58	0	4.8

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

Subpart OO - Table 46d Destruction facilities, that do not also produce, import, transform, or export

Activity	Labor Rates (per hour)							
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Administrative Support	
	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours	Initial Year Hours	Subseq. Year Hours
		\$114.80		\$91.33		\$73.83		\$34.09
Planning	0	2	0	1	0	1	0	0

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

QA/QC	0	0	0	5	0	0	0	0
Recordkeeping	0	0	0	1	0	13	0	1
Sampling and Analysis (Calculations)	0	0	0	0.64	0	12.8	0	1.28
Reporting	0	0	0	2	0	26	0	2
Total	0	2	0	9.64	0	52.8	0	4.28

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$5,665.00	\$729,364.11

Labor Cost per Year per Reporting Facility	
Initial Year	Subseq. Year
\$0	\$395
\$0	\$457
\$0	\$1,085
\$0	\$3,927
\$0	\$2,170
\$0	\$8,034

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**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Labor Cost per Year per Reporting Facility	
Initial Year	Subseq. Year
\$0	\$395
\$0	\$457
\$0	\$1,085
\$0	\$1,472
\$0	\$2,170
\$0	\$5,580

58

Labor Cost per Year per Reporting Unit/Facility	
Initial Year	Subseq. Year
\$0	\$395
\$0	\$457
\$0	\$1,085
\$0	\$1,472
\$0	\$2,170
\$0	\$5,580

24

Labor Cost per Year per Reporting Unit/Facility	
Initial Year	Subseq. Year
\$0	\$395

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$0	\$457
\$0	\$1,085
\$0	\$1,047
\$0	\$2,170
\$0	\$5,154

8

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
103.00	3,635.00	374,405.00	7,642.40	1,208.12	646.24	236.00	9,732.76	\$723,699.11	\$ -	\$5,665.00	\$729,364.11

Existing facilities

Subpart OO - Table 47

		Activity	Cost Categories				Total Reporting per Facility Cost (2021\$)	
			Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
2021	103	Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
2022	103	Performance testing	\$0		\$0	\$0	\$0	\$0
2023	103	Recordkeeping	\$0	0	\$0	\$55	\$0	\$55
		Travel	\$0		\$0	\$0	\$0	\$0
		Sampling Costs	\$0		\$0	\$0	\$0	\$0
		Total	\$0		\$0	\$55	\$0	\$55

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: data/bls.gov/cgi-bin/surveymost?bls

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SAO

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
103.00	3,635.00	374,405.00	7,642.40	1,208.12	646.24	236.00	9,732.76	\$723,699.11	\$ -	\$5,665.00	\$729,364.11	103.00	3,635.00	374,405.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average								
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 (\$)
7,642.40	1,208.12	646.24	236.00	9,732.76	\$723,699.11	\$ -	\$5,665.00	\$729,364.11

Total for 3 year period

\$ 2,188,092

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
PP. Suppliers of CO2	128.00	94.00	12,032.00	1,152.00	320.00	192.00	0.00	1,664.00	\$120,823.04	\$ -

Table 46 Labor Costs: Subpart PP

Activity	Labor Rates (per hour)								Labor Cost Reporting Unit	
	Lawyer \$114.80		Industrial Manager \$91.33		Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year		
Planning	0	0	0	0	0	0	0	0	0	\$0
QA/QC	0	0	0	0	0	0	0	0	0	\$0
Recordkeeping	0	0	0.5	0.5	2	2	0.5	0.5	0.5	\$0
Sampling and Analysis (Calculations)	0	0	1	1	3	3	0	0	0	\$0
Reporting	0	0	1	1	4	4	1	1	1	\$0
Total	0	0	2.5	2.5	9	9	1.5	1.5	1.5	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47 Capital and O&M Costs: Subpart PP

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

Existing facilities

128 2021

128 2022

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance Testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$55	\$0	\$55

128

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$7,040.00	\$127,863.04

	Existing facilities
	\$128
per Year per Init/Facility	\$128
Subseq. Year	128
\$0	
\$0	
\$210	
\$313	
\$421	
\$944	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
128.00	94.00	12,032.00	1,152.00	320.00	192.00	0.00	1,664.00	\$120,823.04	\$ -	\$7,040.00	\$127,863.04

2021
2022
2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3											
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 (\$)
128.00	94.00	12,032.00	1,152.00	320.00	192.00	0.00	1,664.00	\$120,823.04	\$ -	\$7,040.00	\$127,863.04

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average											
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 (\$)
128.00	94.00	12,032.00	1,152.00	320.00	192.00	0.00	1,664.00	\$120,823.04	\$ -	\$7,040.00	\$127,863.04

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 383,589

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
Imports and Exports of Fluorinated GHGs in Products	44.00	4,092.00	180,048.00	2,244.00	286.00	242.00	44.00	2,816.00	\$205,095.88

Table 46. Labor Costs: Subpart QQ

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	1	0	1	0	2	0	1
QA/QC	0	0	0	1	0	2	0	0
Recordkeeping	0	0	0	1	0	13	0	1
Sampling and Analysis (Calculations)	0	0	0	1.5	0	8	0	1.5
Reporting	0	0	0	2	0	26	0	2
Total	0	1	0	6.5	0	51	0	5.5

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart QQ

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)		Existing facilities	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
							44	2021
							44	2022

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation)					\$0	\$0
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel					\$0	\$0
Sampling Costs					\$0	\$0
Total	\$0		\$0	\$55	\$0	\$55

44

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$2,420.00	\$207,515.88

Labor Cost per Year per Reporting Unit/Facility		Existing facilities
Initial Year	Subseq. Year	
\$0	\$388	\$44
\$0	\$239	\$44
\$0	\$1,085	44
\$0	\$779	
\$0	\$2,170	
\$0	\$4,661	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2									
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 (\$)
44.00	4,092.00	180,048.00	2,244.00	286.00	242.00	44.00	2,816.00	\$205,095.88	\$ -

2021
2022
2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

		Year 3							
O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)
\$2,420.00	\$207,515.88	44.00	4,092.00	180,048.00	2,244.00	286.00	242.00	44.00	2,816.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

				Annual					
Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
\$205,095.88	\$ -	\$2,420.00	\$207,515.88	44.00	4,092.00	180,048.00	2,244.00	286.00	242.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Average					
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
44.00	2,816.00	\$205,095.88	\$ -	\$2,420.00	\$207,515.88

Total for 3 year period

\$ 622,548

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1										
	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 (\$)
ICR: Geologic Sequestration of Carbon Dioxide	9.00	1,882	16,938.00	2,517.00	738.00	263.00	186.00	3,704.00	\$450,257.77	\$ -	\$17,680.00

Table 46. Labor Costs: Subpart RR (Class VI)

Activity	Labor Rates (per hour)								Labor Cost per Year per Reporting Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$132.31		Industrial Engineer/Technician \$123.46		Administrative Support \$77.99			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	0	25	0	67.3	0	171.3	0	68	\$0	\$38,228
QA/QC	0	25	0	64.3	0	132.3	0	0	\$0	\$27,713
Recordkeeping	0	0		1		13		1	\$0	\$1,815
Sampling and Analysis (Calculations)	0	0	0	67.3	0	342.5	0	0	\$0	\$51,197
Reporting	0	0		2		26		2	\$0	\$3,631
Total	0	50	0	202	0	685	0	71	\$0	\$122,584

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart RR (Class VI)

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2006\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Equipment (selection, purchase, installation) ^a				\$17,680	\$17,680	\$17,680
Performance testing					\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$0	\$0	\$0
Travel					\$0	\$0
Sampling Costs ^b					\$0	\$0
Total	\$0		\$0	\$17,680	\$17,680	\$17,680

\$17,680

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100
(Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

*The 2017 value for O&M costs was \$16,000. A 10.5% inflation rate is estimated between 2017 and 2021, thus adding \$1,600 to \$16,000 = \$17,600.

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total Cost (\$)
\$467,937.77

Existing
facilities

1

1

1

\$122,584.00

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

\$310,748.82

\$97,644.78

\$20,511.37

\$21,352.80

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
9.00	1,882.00	16,938.00	2,517.00	738.00	263.00	186.00	3,704.00	\$450,257.77	\$ -	\$17,680.00	\$467,937.77

Table 46. Labor Costs: Subpart RR (Class II)

	Labor Rates (per hour)								Labor Cost per Reporting Unit
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support		
	\$114.80		\$132.31		\$123.46		\$77.99		
Activity	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
Planning	8.5	8.5	22.3	22.3	57.3	57.3	21	21	\$12,638
QA/QC	8.5	8.5	19.3	19.3	18.3	18.3	0	0	\$5,788
Recordkeeping	0	0	1	1	13	13	1	1	\$1,815
Sampling and Analysis (Calculations)	0	0	22.3	22.3	114.5	114.5	0	0	\$17,092
Reporting	0	0	2	2	26	26	2	2	\$3,631
Total	17	17	67	67	229	229	24	24	\$40,964

Labor rates are obtained from appendix D-1 - Respondent Labor Rates

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR

new sources 0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3											
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 (\$)
9.00	1,882.00	16,938.00	2,517.00	738.00	263.00	186.00	3,704.00	\$450,257.77	\$ -	\$17,680.00	\$467,937.77

Existing facilities	
	\$8
per Year per it/Facility ^a	\$8
Subseq. Year	\$8
\$12,638	
\$5,788	
\$1,815	
\$17,092	
\$3,631	
\$40,964	\$327,712

\$0

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average											
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 (\$)
9.00	1,882.00	16,938.00	2,517.00	738.00	263.00	186.00	3,704.00	\$450,257.77	\$ -	\$17,680.00	\$467,937.77

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 1,403,813

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
Equipment Producers	5.00	465.00	2,325.00	185.00	25.00	20.00	5.00	235.00	\$17,197.60	\$ -

Table 46. Labor Costs: Subpart SS

Activity	Labor Rates (per hour)								Labor Cost Reporting U
	Lawyer		Industrial Manager		Industrial Engineer/Technician		Adminstrative Support		
	\$114.80		\$91.33		\$73.83		\$34.09		
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year
Planning	0	1	0	1	0	2	0	0.5	\$0
QA/QC	0	0	0	1	0	12	0	0.5	\$0
Recordkeeping	0	0	0	0.5	0	5	0	0.5	\$0
Sampling and Analysis (Calculations)	0	0	0	1.5	0	8	0	1.5	\$0
Reporting	0	0	0	1	0	10	0	1	\$0
Total	0	1	0	5	0	37	0	4	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/QC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart SS

Cost Categories	Total Reporting per Unit/Facility Cost (2021\$)

Existing facilities

5

2021

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
Equipment (selection, purchase, installation)					\$0	\$0	5	2022
Performance testing					\$0	\$0	5	2023
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55		
Travel					\$0	\$0		
Sampling Costs					\$0	\$0		
Total	\$0		\$0	\$55	\$0	\$55		

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U..S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$275.00	\$17,472.60

	Existing facilities
	\$5
per Year per Jnit/Facility	\$5
	5
Subseq. Year	
\$371	
\$994	
\$432	
\$779	
\$864	
\$3,440	

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2												No. Respondents	Responses/ Respondent	Total Responses
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses
5.00	465.00	2,325.00	185.00	25.00	20.00	5.00	235.00	\$17,197.60	\$ -	\$275.00	\$17,472.60	5.00	465.00	2,325.00

2021

2022

2023

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3									Annual					
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)
185.00	25.00	20.00	5.00	235.00	\$17,197.60	\$ -	\$275.00	\$17,472.60	5.00	465.00	2,325.00	185.00	25.00	20.00

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Average					
Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
5.00	235.00	\$17,197.60	\$ -	\$275.00	\$17,472.60

Total for 3 year period

\$ 52,418

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1								
	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
TT -Industrial Landfills	167.00	1,661.00	277,387.00	7,014.00	1,002.00	835.00	167.00	9,018.00	\$656,993.03

Table 1. Labor Costs: Subpart TT

Activity	Labor Rates (per hour)							
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Adminstrative Support \$34.09	
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year
Planning	3	1	3	1	3	1	3	1
QA/QC	0	0	2	1	1	1	2	1
Recordkeeping	0	0	1	1	13	13	1	1
Sampling and Analysis (Calculations)	0	0	2	1	2	1	0	0
Reporting	0	0	2	2	26	26	2	2
Total	3	1	10	6	45	42	8	5

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 2. Capital and O&M Costs: Subpart TT

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)		Existing facilities	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years		
							167	2021
							167	2022

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	0	\$0	\$55	\$55	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$105	\$105	\$0
Total	\$0		\$0	\$160	\$160	\$55

167

2023

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

$270.970/245.120 = 1.1054$, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

b Converted \$95 in 2013\$ to 2021\$ using the Chemical Engineering Plant Cost Index to scale the 2013\$ to 2021\$. The 2021 CEPCI value is 708.0, and the CEPCI value for 2013

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$9,185.00	\$666,178.03

Labor Cost per Year per Reporting Unit/Facility		Existing facilities
Initial Year	Subseq. Year	
\$942	\$314	\$167
\$325	\$199	\$167
\$1,085	\$1,085	167
\$330	\$165	
\$2,170	\$2,170	
\$4,853	\$3,934	

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

was 567.3. Cost in 2021 = Cost in 2013x2021 CEPCI

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2											
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 (\$)
167.00	1,661.00	277,387.00	7,014.00	1,002.00	835.00	167.00	9,018.00	\$656,993.03	\$ -	\$9,185.00	\$666,178.03

2021

2022

2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

I/2013 CEPCI = $95 \times 708 / 567.3 = 118.56$

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Year 3											
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 (\$)
167.00	1,661.00	277,387.00	7,014.00	1,002.00	835.00	167.00	9,018.00	\$656,993.03	\$ -	\$9,185.00	\$666,178.03

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Annual Average											
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 (\$)
167.00	1,661.00	277,387.00	7,014.00	1,002.00	835.00	167.00	9,018.00	\$656,993.03	\$ -	\$9,185.00	\$666,178.03

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Total for 3 year period

\$ 1,998,534

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Source Category	Year 1									
	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 (\$)
CC- Injection of Carbon Dioxide	87.00	62.00	5,394.00	783.00	217.50	130.50	0.00	1,131.00	\$82,121.91	\$ -

Table 46. Labor Costs: Subpart UU

Activity	Labor Rates (per hour)								Labor Cost per Unit/Facility	
	Lawyer \$114.80		Industrial Manager \$91.33		Industrial Engineer/Technician \$73.83		Administrative Support \$34.09			
	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	Subseq. Year	Initial Year	
Planning	0	0	0	0	0	0	0	0	0	\$0
QA/QC	0	0	0	0	0	0	0	0	0	\$0
Recordkeeping	0	0	0	0.5	0	2	0	0.5	0	\$0
Sampling and Analysis (Calculations)	0	0	0	1	0	3	0	0	0	\$0
Reporting	0	0	0	1	0	4	0	1	0	\$0
Total	0	0	0	2.5	0	9	0	1.5	0	\$0

Labor rates are obtained from appendix D-1 - Respondent Labor Rates:

Estimated hours for planning, QA/AC, Recordkeeping, sampling and analysis (calculations), and reporting, are based on 2019 ICR (EPA ICR No. 2300.18)

new sources 0

Table 47. Capital and O&M Costs: Subpart UU

Existing facilities

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Activity	Cost Categories				Total Reporting per Unit/Facility Cost (2021\$)	
	Capital Cost (2021\$)	Equipment Lifetime	Annualized Capital Cost (2021\$/year)	O&M Costs (2021\$/year)	Initial Year	Subseq. Years
Equipment (selection, purchase, installation)	\$0	0	\$0	\$0	\$0	\$0
Performance Testing	\$0	0	\$0	\$0	\$0	\$0
Recordkeeping	\$0	\$0	\$0	\$55	\$0	\$55
Travel	\$0	0	\$0	\$0	\$0	\$0
Sampling Costs	\$0	0	\$0	\$0	\$0	\$0
Total	\$0	\$0	\$0	\$55	\$0	\$55

87 **2021**

87 **2022**

87 **2023**

Values are based on a 10.5% inflation rate between 2017 and 2021. O&M values from the 2019 ICR (based on 2017 values) were increased by 10.5% to be reflective of 2021 costs. For explanation of methodologies used to determine costs, please refer to the 2019 ICR.

Source of inflation values: [data/bls.gov/cgi-bin/surveymost?bls](https://data.bls.gov/cgi-bin/surveymost?bls)

U.S. Bureau of Labor Statistics-Top Picks-Price Indexes-CPI for All Urban Consumers (CPI-U) 1982-84=100 (Unadjusted) - CUUR0000SA0

2017 Average CPI = 245.120; 2021 Average CPI = 270.970

270.970/245.120 = 1.1054, thus the inflation rate between 2017 and 2021 = 10.54%, rounded to 10.5%

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

O&M Cost (\$)	Total Cost (\$)
\$4,785.00	\$86,906.91

	Existing facilities
Cost per Reporting Facility	\$87
Subseq. Year	\$87
\$0	
\$0	
\$210	
\$313	
\$421	
\$944	

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 2																
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 (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)
87.00	62.00	5,394.00	783.00	217.50	130.50	0.00	1,131.00	\$82,121.91	\$ -	\$4,785.00	\$86,906.91	87.00	62.00	5,394.00	783.00	217.50

2021

2022

2023

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

**Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent**

Year 3							Annual Average								
Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)	Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)	No. Respondents	Responses/ Respondent	Total Responses	Burden - Technical (hrs)	Burden - Managerial (hrs)	Burden - Clerical (hrs)	Burden - Legal (hrs)	Total Burden (hrs)	Total Labor Cost (\$)
130.50	0.00	1,131.00	\$82,121.91	\$ -	\$4,785.00	\$86,906.91	87.00	62.00	5,394.00	783.00	217.50	130.50	0.00	1,131.00	\$82,121.91

Appendix C-1
Mandatory Reporting of Greenhouse Gases, Final Total Without Corporate Parent

Capital Cost (\$)	O&M Cost (\$)	Total Cost (\$)
\$ -	\$4,785.00	\$86,906.91

Total for 3 year period

\$ 260,721