

ATTACHMENT C

Work Sheets used to Calculate Respondent & Agency Labor Costs

This attachment is available as part of the electronic docket **EPA-HQ-OPP-2024-0139** and is part of the ICR's Supporting Statement.

Respondent Labor Costs

Pesticide Registrants ¹ (NAICS: 3250A1)				
Item	Formula	Labor Category ²		
		Managerial	Technical	Clerical
Unloaded Hourly Rate ¹	= W	\$76.32	\$41.48	\$28.16
Benefits Percentage ³	Lb = B/W	45.2%	45.2%	45.2%
Benefits per hour	B = W*Lb	\$34.46	\$18.73	\$12.72
Loaded Hourly Rate	Wb = W + B = W(1+Lb)	\$110.78	\$60.21	\$40.88
Overhead Percentage ⁴	Lo = OH/Wb	50%	50%	50%
Overhead per hour	OH = Wb*Lo	\$55.39	\$30.11	\$20.44
Fully Loaded Hourly Rate	Wf = Wb + OH = W + B + OH	\$166.18	\$90.32	\$61.31

1. Source: Bureau of Labor Statistics, NAICS 3250A1 - Pesticide, Fertilizer, and Other Agricultural Chemical Manufacturing, 2023 data, Accessed April 2024, <https://www.bls.gov/oes/home.htm>
2. Standard Occupational Codes:
 Management: 11-0000, Management Occupations
 Technical: 19-0000, Life Physical, and Social Science Occupations
 Clerical: 43-0000, Office and Administrative Support Occupations
3. Fringe benefits/wage per hour. The average for non-farm, non-federal civilian workers. <https://www.bls.gov/oes/home.htm>
4. U.S. Environmental Protection Agency, EPA Air Pollution Control Cost Manual, Sixth Edition, EPA-452-02-001, January 2002, pp. 2-34. The loading for indirect costs is within the range of 20-70% of the loaded labor rate (wage + benefits) suggested in EPA guidance.

Agency Labor Costs

EPA or Federal Government ¹ (NAICS: 999100)				
Item	Formula	Labor Category ²		
		Managerial	Technical ⁵	Clerical
Unloaded Hourly Rate ¹	= W	\$69.38	\$46.73	\$25.27
Unloaded Yearly Wage (\$/year)	= W * 2080 (52wks * 40hrs)	n/a	\$97,198	n/a
Benefits Percentage ³	Lb = B/W		45.2%	
Benefits per year	B = W*Lb		\$43,893.05	
Loaded Yearly Wage (\$/year)	Wb = W + B = W(1+Lb)		\$141,091.45	
Overhead Percentage ⁴	Lo = OH/Wb		50%	
Overhead per Wage (\$/year)	OH = Wb*Lo		\$70,545.72	
Fully Loaded Yearly Wage (\$/year)	Wf = Wb + OH = W + B + OH		\$211,637.17	

1. Source: Bureau of Labor Statistics, NAICS 999100 - Federal Executive Branch, 2023 data, Accessed April 2024, <https://www.bls.gov/oes/home.htm>
2. Standard Occupational Codes:
 Management: 11-0000, Management Occupations
 Technical: 19-0000, Life Physical, and Social Science Occupations
 Clerical: 43-0000, Office and Administrative Support Occupations
3. Fringe benefits/wage per hour. The average for non-farm, non-federal civilian workers. <https://www.bls.gov/oes/home.htm>
4. U.S. Environmental Protection Agency, EPA Air Pollution Control Cost Manual, Sixth Edition, EPA-452-02-001, January 2002, pp. 2-34. The loading for indirect costs is within the range of 20-70% of the loaded labor rate (wage + benefits) suggested in EPA guidance.
5. Only technical is used because the other labor types are not very involved in the reviewing of NOA submissions. The Fully Loaded Yearly Wage will be multiplied by the number of FTEs (full time equivalents) to get the labor cost component of the annual Agency burden.