

General Information										Financial Data										Operational Metrics										Compliance & Audit										
ID	Name	Address	City	State	Zip	Phone	Fax	Email	Website	Revenue	Profit	Expenses	Assets	Liabilities	Equity	Debt	Interest	Taxes	Distributions	Units	Hours	Costs	Quality	Efficiency	Customer	Supplier	Inventory	Production	Waste	Energy	Water	Gas	Electric	Other	Compliance	Audit	Notes			
1	ABC Corp	123 Main St	New York	NY	10001	212-555-1234		info@abc.com	www.abc.com	1000000	100000	900000	500000	300000	200000	100000	50000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000		
2	DEF Inc	456 Elm St	Los Angeles	CA	90001	213-555-5678		info@def.com	www.def.com	2000000	200000	1800000	1000000	500000	300000	100000	50000	10000	5000	10000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	
3	GHI LLC	789 Oak St	Chicago	IL	60601	312-555-9012		info@ghi.com	www.ghi.com	500000	50000	450000	200000	100000	50000	20000	10000	5000	2000	5000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
4	JKL Corp	101 Pine St	San Francisco	CA	94101	415-555-3456		info@jkl.com	www.jkl.com	3000000	300000	2700000	1500000	700000	400000	100000	50000	10000	5000	10000	3000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	
5	MNO Inc	202 Cedar St	Houston	TX	77001	281-555-7890		info@mno.com	www.mno.com	750000	75000	675000	300000	150000	80000	30000	15000	5000	2000	5000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
6	PQR LLC	303 Birch St	Phoenix	AZ	85001	602-555-2345		info@pqr.com	www.pqr.com	1500000	150000	1350000	700000	350000	200000	50000	25000	10000	5000	10000	1500	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	
7	STU Corp	404 Maple St	Philadelphia	PA	19101	215-555-6789		info@stu.com	www.stu.com	900000	90000	810000	400000	200000	100000	30000	15000	5000	2000	5000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
8	VWX Inc	505 Elm St	San Antonio	TX	78201	210-555-0123		info@vwx.com	www.vwx.com	600000	60000	540000	250000	120000	60000	20000	10000	5000	2000	5000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
9	YZA LLC	606 Oak St	Portland	OR	97201	503-555-4567		info@yza.com	www.yza.com	400000	40000	360000	150000	70000	30000	10000	5000	2000	1000	5000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
10	BCD Corp	707 Pine St	San Jose	CA	95101	408-555-8901		info@bcd.com	www.bcd.com	2500000	250000	2250000	1200000	600000	300000	100000	50000	10000	5000	10000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	
11	EFG Inc	808 Cedar St	Jacksonville	FL	32201	904-555-2345		info@efg.com	www.efg.com	1100000	110000	990000	500000	250000	120000	40000	20000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
12	HIJ LLC	909 Birch St	Fort Worth	TX	76101	817-555-6789		info@hij.com	www.hij.com	800000	80000	720000	350000	170000	80000	25000	12000	5000	2000	5000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
13	KLM Corp	1010 Oak St	Columbus	GA	31901	706-555-0123		info@klm.com	www.klm.com	1300000	130000	1170000	600000	300000	150000	50000	25000	10000	5000	10000	1500	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	
14	NOP Inc	1111 Pine St	Indianapolis	IN	46201	317-555-4567		info@nop.com	www.nop.com	1700000	170000	1530000	800000	400000	200000	70000	35000	15000	7000	15000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	
15	QRS LLC	1212 Cedar St	San Diego	CA	92101	619-555-8901		info@qrs.com	www.qrs.com	1200000	120000	1080000	550000	270000	130000	40000	20000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
16	TUV Corp	1313 Birch St	Memphis	TN	38101	901-555-2345		info@tuv.com	www.tuv.com	950000	95000	855000	450000	220000	110000	35000	17000	8000	4000	10000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
17	WXY Inc	1414 Oak St	Las Vegas	NV	89101	702-555-6789		info@wxy.com	www.wxy.com	1600000	160000	1440000	750000	370000	180000	60000	30000	12000	6000	15000	1500	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	
18	ZAB LLC	1515 Pine St	Baltimore	MD	21201	410-555-0123		info@zab.com	www.zab.com	1100000	110000	990000	500000	250000	120000	40000	20000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
19	CDE Corp	1616 Cedar St	San Jose	CA	95101	408-555-4567		info@cde.com	www.cde.com	2200000	220000	1980000	1100000	550000	270000	100000	50000	10000	5000	10000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000
20	FGH Inc	1717 Oak St	San Francisco	CA	94101	415-555-8901		info@fgh.com	www.fgh.com	2800000	280000	2520000	1400000	700000	350000	120000	60000	15000	7000	15000	3000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	
21	IKL LLC	1818 Pine St	San Antonio	TX	78201	210-555-2345		info@ikl.com	www.ikl.com	1000000	100000	900000	450000	220000	110000	35000	17000	8000	4000	10000	500	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	
22	JMN Corp	1919 Cedar St	San Diego	CA	92101	619-555-6789		info@jmn.com	www.jmn.com	1800000	180000	1620000	850000	420000	200000	70000	35000	15000	7000	15000	1500	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	15000	
23	OPQ Inc	2020 Oak St	San Jose	CA	95101	408-555-0123		info@opq.com	www.opq.com	2000000	200000	1800000	1000000	500000	250000	100000	50000	10000	5000	10000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	
24	RST LLC	2121 Pine St	San Antonio	TX	78201	210-555-4567		info@rst.com	www.rst.com	1400000	140000	1260000	650000	320000	150000	50000	25000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
25	UVW Corp	2222 Cedar St	San Jose	CA	95101	408-555-8901		info@uvw.com	www.uvw.com	2600000	260000	2340000	1300000	650000	320000	110000	55000	12000	6000	15000	2500	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	25000	
26	XYZ Inc	2323 Oak St	San Francisco	CA	94101	415-555-2345		info@xyz.com	www.xyz.com	3200000	320000	2880000	1600000	800000	400000	130000	65000	15000	7000	15000	3500	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	35000	
27	ABC LLC	2424 Pine St	San Antonio	TX	78201	210-555-6789		info@abc.com	www.abc.com	1200000	120000	1080000	550000	270000	130000	40000	20000	10000	5000	10000	1000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	
28	DEF Corp	2525 Cedar St	San Jose	CA	95101	408-555-0123		info@def.com	www.def.com	2100000	210000	1890000	1050000	520000	260000	100000	50000	10000	5000	10000	2000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	20000	
29	GHI Inc	2626 Oak St	San Francisco	CA	94101	415-555-4567		info@ghi.com	www.ghi.com	2900000	290000	2610000	1550000	770000	380000	120000	60000	15000	7000	15000	3000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	30000	
30	JKL LLC	2727 Pine St	San Antonio	TX	78201	210-555-8901		info@jkl.com	www.jkl.com	1100000	110000	990000	500000	250000	120000	40000	20000	10000																						



Segment	RY2023 facilities	Change in Facility Count Due to GWP Changes (ICR No. 2773.02)
Onshore Production	445	40
Offshore Production	109	7
Gathering and Boosting	349	0
Natural Gas Processing	445	0
Natural Gas Transmission Compression	653	130
Natural Gas Transmission Pipeline	42	1
Underground Natural Gas Storage	51	9
LNG Import/Export	13	0
LNG Storage	6	1
Natural Gas Distribution	157	0
<b>Total</b>	<b>2245</b>	<b>188</b>

Total number is smaller than the sum of facilities from each segment b/c some facilities re RY2023 reporters taken from the PNGS sector summary for 2023, less "Other Oil and Gas". Changes in reporters are taken from the impacts analysis of the 2024 Subpart W rule.

	Technician (\$/hr)	Engineer (\$/hr)
Wages & Salaries (2024\$)	\$49.49	\$81.44
Loaded Hourly Rates for Renewal ICR (2024\$)	\$79.83	\$131.28

**Table 5. Average Per Respondent**  
(from OMB No. 2060-0629, ICF)

Change in Facility Due to SubW Rule Changes (ICR No. 2774.02)	Total Projected Facilities
269	754
0	116
0	349
53	498
234	1017
3	46
7	67
0	13
1	8
0	157
<b>567</b>	<b>3000</b>

Technician (hrs/respondent)	Engineer (hrs/respondent)
12.1	251.4
2	25.5
4.7	82.2
3.1	58.2
3	58.6
3	53
3.4	54.9
3.5	56
3.4	53.3
3.4	55

port under multiple segments  
Combustion" reporters that do not report to W

Middle Manager (\$/hr)	Senior Manager (\$/hr)	Lawyer (\$/hr)
\$93.71	\$87.50	\$104.35
\$151.15	\$141.14	\$166.96

**Respondent Burden Programmatic ICR 2024 renewal**  
(OMB No. 2300.20)

Middle Manager (hrs/respondent)	Senior Manager (hrs/respondent)	Lawyer (hrs/respondent)	O&M / respondent (2021\$)
24.2	10.6	2	\$182.00
2.6	0.3	2	\$55.00
7.3	2.2	2	\$203.00
4.9	1	2	\$23,648.00
5	1	2	\$16,305.00
4.4	0.7	2	\$55.00
4.6	0.8	2	\$30,536.00
4.7	0.9	2	\$21,640.00
4.4	0.7	2	\$6,111.00
4.6	0.8	2	\$7,091.00

**Table 6. Average Burden**  
(from OMB N

Technician (hrs/respondent)
1657.7
0.0
227.7
121.3
9.0
5.9
17.4
34.9
0.0
0.0

**erage Per Respondent 2024 Subpart W ICR-New Provisions Only**  
lo. 2060-0751, ICR No, 2774.02)

Engineer (hrs/respondent)	Middle Manager (hrs/respondent)	Senior Manager (hrs/respondent)	Lawyer (hrs/respondent)	O&M / respondent (2021\$)
296.8	29.7	11.0	0.0	\$4,722
0.2	0.0	0.0	0.0	\$0
87.7	8.8	2.6	0.0	\$3,656
93.3	9.3	4.7	0.0	\$2,641
11.2	1.1	0.6	0.0	\$1,555
6.1	0.6	0.3	0.0	\$0
18.6	1.9	0.9	0.0	\$1,871
14.1	1.4	0.7	0.0	\$2,395
24.5	2.5	1.2	0.0	\$2,570
8.2	0.8	0.4	0.0	\$0

Combined La

Technician (hrs/respondent)
1,669.8
2.0
232.4
124.4
12.0
8.9
20.8
38.4
3.4
3.4

abor / Respondent (ICR No. 2300.20 and 2774.02)

Engineer (hrs/respondent)	Middle Manager (hrs/respondent)	Senior Manager (hrs/respondent)	Lawyer (hrs/respondent)
548.2	53.9	21.6	2.0
25.7	2.6	0.3	2.0
169.9	16.1	4.8	2.0
151.5	14.2	5.7	2.0
69.8	6.1	1.6	2.0
59.1	5.0	1.0	2.0
73.5	6.5	1.7	2.0
70.1	6.1	1.6	2.0
77.8	6.9	1.9	2.0
63.2	5.4	1.2	2.0

Total hours for all respondents

Technician	Engineer
1,259,064	413,324
232	2,982
81,108	59,301
61,950	75,441
12,217	70,997
410	2,718
1,397	4,927
499	912
27	623
534	9,923

Middle Manager	Senior Manager	Lawyer
40,624	16,293	1,508
304	36	232
5,609	1,682	698
7,086	2,821	996
6,225	1,587	2,034
230	46	92
433	116	134
79	21	26
55	15	16
851	190	314
		2,148,942

Table 7. Combined Labor and O&M

Labor Cost (2024\$)	O&M / respondent (2024\$)
\$163,461,313	\$5,514
\$499,804	\$62
\$15,461,593	\$4,340
\$16,484,769	\$29,564
\$11,800,398	\$20,085
\$446,259	\$62
\$862,576	\$36,444
\$178,876	\$27,030
\$97,054	\$9,763
\$1,553,127	\$7,974
\$210,845,768	



I Costs for Subpart W

O&M Total (2024\$)	Total Respondent Cost (Subpart W) (2024\$)
\$4,157,910	\$167,619,223
\$7,175	\$506,979
\$1,514,681	\$16,976,274
\$14,722,629	\$31,207,398
\$20,426,896	\$32,227,294
\$2,845	\$449,104
\$2,441,743	\$3,304,319
\$351,386	\$530,262
\$78,102	\$175,156
\$1,251,976	\$2,805,103
\$44,955,344	\$255,801,112

**Exhibit 12.1a. Summary of Annual Respondent Burden and Cost of Final Review**

Year	Number of Respondents	Total Labor Hours
1	0	0
2	0	0
3	0	0
Total	0	0
3-Yr Annual Average	0	0

**Exhibit 12.1b. Summary of Reduced Annual Respondent Burden and Cost of Final Review**

Year	Number of Respondents	Total Labor Hours
1	(8,971)	(2,596,244)
2	(8,971)	(2,596,244)
3	(8,971)	(2,596,244)
Total (rounded)	(26,900)	(7,790,000)
3-Yr Annual Average (rounded)	(8,970)	(2,600,000)

isions for the Greenhouse Gas Reporting Rule

Labor Costs	Non-Labor Costs (Annualized Capital/Startup and O&M)	Total Costs
\$0	\$0	\$0
\$0	\$0	\$0
\$0	\$0	\$0
\$0	\$0	\$0
\$0	\$0	\$0

Final Revisions for the Greenhouse Gas Reporting Rule

Labor Costs	Non-Labor Costs (Annualized Capital/Startup and O&M)	Total Costs
(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
(\$247,693,715)	(\$54,990,106)	(\$302,683,821)
(\$743,000,000)	(\$165,000,000)	(\$908,000,000)
(\$248,000,000)	(\$55,000,000)	(\$303,000,000)

**Exhibit 12.2. Annual Burden Reduction Over the First Three Years of the Information Colle**

Source Category	Number of Respondents (from 2023, except for new subparts, and corrected for changes to applicability in 2024 final rule)	Total Burden Reduced (hrs)
C. Stationary Combustion (C only)	1,813	76,007
C -plus at least one other subpart - all tiers	3,587	155,900
D. Electricity Generation	1,086	4,996
E. Adipic Acid Prod.	2	44
F. Aluminum Production	7	446
G. Ammonia Manufacturing	29	1,237
H. Cement Production	90	2,209
I. Electronics Manufacturing	47	11,454
K. Ferroalloy Production	8	316
L. Fluorinated Greenhouse Gas Prod	15	12,594
N. Glass Production	102	4,940
O. HCFC-22 Production and HFC- 23 Destruction	5	570
P. Hydrogen Production	115	4,900
Q. Iron and Steel Production	121	2,934
R. Lead Production	11	273
S. Lime Manufacturing	68	1,910
T. Magnesium Production	8	144
U. Misc. Uses of Carbonate	6	54
V. Nitric Acid Production	28	907
W. Petroleum and Natural Gas Systems	3,000	2,148,942
X. Petrochemical Prod.	74	11,065
Y. Petroleum Refineries	122	6,726
Z. Phosphoric Acid Prod	9	90

AA. Pulp & Paper Manufacturing	98	2,785
BB. Silicon Carbide Production	1	16
CC. Soda Ash Manufacturing	4	37
DD. Sulfur Hexafluoride (SF6) from Electric Power Systems	82	3,652
EE. Titanium Dioxide Production	6	92
FF. Underground Coal Mines	58	4,023
GG. Zinc Production	6	191
HH. Landfills	1,131	74,147
II. Wastewater	120	3,841
LL. Suppliers of Coal-based Liquid Fuels	1	22
MM. Suppliers of Petrol. Prod.	274	10,576
NN. Supplies of Nat Gas and Nat Gas Liquids	522	8,786
OO. Suppliers of Industrial GHG	150	14,309
PP. Suppliers of CO2	160	2,095
QQ - Imports and Exports of Fluorinated GHGs in Products	57	3,653
RR. Geologic Sequestration of Carbon Dioxide	19	7,820
SS - SF6 Equipment Producers	5	240
TT -Industrial Landfills	162	8,812
UU. Injection of Carbon Dioxide	79	1,003
VV. Geologic Sequestration of CO2 with EOR	2	27
WW. Coke Calciners	15	504
XX. Calcium Carbide	1	38
YY. Caprolactam, Glyoxal, and Glyoxalic Acid Production	6	166
ZZ. Ceramics Production	25	753
<b>Totals</b>	<b>8,971</b>	<b>2,596,244</b>
<b>Totals (Rounded)</b>		<b>2,600,000</b>

Note: The total number of respondents is less than the sum of the respondents for each sul

ction, by Source Category

Total Reduced Labor Cost (\$/year)	Total Reduced O&M Cost (\$/year)	Total Cost Savings (\$/year)
\$ 6,200,357	\$ 2,151,529	\$ 8,351,887
\$ 12,723,325	\$ 3,878,496	\$ 16,601,821
\$ 387,166	\$ 67,171	\$ 454,336
\$ 3,660	\$ 6,880	\$ 10,541
\$ 37,440	\$ 5,028	\$ 42,468
\$ 102,205	\$ 160,854	\$ 263,059
\$ 172,971	\$ 5,567	\$ 178,537
\$ 939,466	\$ 299,345	\$ 1,238,810
\$ 26,618	\$ 495	\$ 27,113
\$ 1,006,509	\$ 928	\$ 1,007,437
\$ 406,936	\$ 12,930	\$ 419,867
\$ 46,027	\$ 309	\$ 46,336
\$ 398,516	\$ 58,907	\$ 457,422
\$ 245,313	\$ 143,056	\$ 388,369
\$ 23,229	\$ 14,350	\$ 37,579
\$ 161,542	\$ 4,206	\$ 165,748
\$ 11,931	\$ 495	\$ 12,426
\$ 4,197	\$ 371	\$ 4,568
\$ 75,317	\$ 258,224	\$ 333,542
\$ 210,845,768	\$ 44,955,344	\$ 255,801,112
\$ 892,178	\$ 145,728	\$ 1,037,906
\$ 553,408	\$ 3,522	\$ 556,931
\$ 7,555	\$ 557	\$ 8,111

\$ 231,469	\$ 29,426	\$ 260,894
\$ 1,178	\$ 285	\$ 1,462
\$ 2,855	\$ 2,506	\$ 5,361
\$ 291,184	\$ 130,545	\$ 421,729
\$ 6,929	\$ 3,043	\$ 9,973
\$ 329,186	\$ 55,429	\$ 384,615
\$ 16,122	\$ 10,438	\$ 26,561
\$ 5,969,330	\$ 2,243,666	\$ 8,212,996
\$ 322,374	\$ 186,768	\$ 509,142
\$ 1,824	\$ 62	\$ 1,886
\$ 876,515	\$ 16,947	\$ 893,462
\$ 735,287	\$ 32,287	\$ 767,574
\$ 1,187,658	\$ 9,380	\$ 1,197,038
\$ 168,618	\$ 9,896	\$ 178,515
\$ 296,777	\$ 3,526	\$ 300,302
\$ 1,042,965	\$ 41,974	\$ 1,084,939
\$ 19,607	\$ 309	\$ 19,916
\$ 716,150	\$ 10,088	\$ 726,238
\$ 80,755	\$ 4,759	\$ 85,514
\$ 2,084	\$ 140	\$ 2,224
\$ 42,500	\$ 22,097	\$ 64,597
\$ 3,200	\$ 70	\$ 3,270
\$ 13,747	\$ 421	\$ 14,167
\$ 63,767	\$ 1,754	\$ 65,521
\$247,693,715	\$54,990,106	\$302,683,821
\$248,000,000	\$55,000,000	\$303,000,000



part because many respondents report under multiple subparts.



**Exhibit 12.3 Bottom Line Annual Burden and Cost**

	Year 1 (2026)	Year 2 (2027)
Respondent Costs		
Number of Respondents	8,971	8,971
Total Respondent Labor Hours	(2,596,244)	(2,596,244)
Total Respondent Labor Costs	(\$247,693,715)	(\$247,693,715)
Non-labor (Capital and O&M) Costs	(\$54,990,106)	(\$54,990,106)
Total Respondent Costs	(\$302,683,821)	(\$302,683,821)
Agency Costs		0
Total Agency Burden Hours	(10,400)	(10,400)
Total Agency Labor Costs	(\$705,744)	(\$705,744)
Total Agency Non-Labor Costs	(\$3,900,000)	(\$3,900,000)
Total Burden Hours (Respondents + Agency)	(2,606,644)	(2,606,644)
Bottom Line Costs (Respondents + Agency)	(\$307,289,565)	(\$307,289,565)

Year 3 (2028)	Total	Annual Average
8,971	(N/A)	8,971
(2,596,244)	(7,788,733)	(2,596,244)
(\$247,693,715)	(\$743,081,144)	(\$247,693,715)
(\$54,990,106)	(\$164,970,318)	(\$54,990,106)
(\$302,683,821)	(\$908,051,463)	(\$302,683,821)
0		
(10,400)	(31,200)	(10,400)
(\$705,744)	(\$2,117,232)	(\$705,744)
(\$3,900,000)	(\$11,700,000)	(\$3,900,000)
(2,606,644)	(7,819,933)	(2,606,644)
(\$307,289,565)	(\$921,868,695)	(\$307,289,565)

(\$58,890,106) Annual non-labor cost

is for respondents and the agency.

**Exhibit 14.1 Annual Agency Burden and Cost Reduction**

<b>Information Collection Activity</b>	<b>Annual Responses</b>	<b>Total Annual Burden (hrs)<sup>1</sup></b>
<b>Developing Guidance, Conducting Training, Audits, and General Oversight</b>	1	(10,400)

**Totals (Rounded)**

<sup>1</sup>10,400 hours is calculated based on a reduction of five FTEs working 80 hours

<sup>2</sup>The labor cost is based on the hour compensation at GS-13 step 1 on the 2024

<sup>3</sup>Non-labor costs cover the development of guidance, training, responding to st the current GHGRP, and we assumed they would be reduced by 5/12 of the cui

<sup>4</sup>Total Annual Cost = Labor Cost + Non-Labor Cost: \$705,744 + \$3,900,000 = \$4,

Labor Cost (2024\$) <sup>2</sup>	Non-Labor Cost (2024\$) <sup>3</sup>	Total Annual Cost (2024\$) <sup>4</sup>
\$ (705,744)	\$ (3,936,017)	\$ (4,641,761)
\$ (706,000)	\$ (3,940,000)	\$ (4,640,000)

per two-week pay period, for 26 pay periods per year (5 x 80 x 26 = 10,400).

† pay scale: \$42.21 x 1.6 to account for overhead and benefits = \$67.86. 10,400 x \$67.86 = \$705,74

takeholders, communications and outreach, database maintenance, and other contractor support. rrent amount, and were then scaled from 2021\$ to 2024\$ using the CEPCI.

,641,761. These costs are negative because they result from a reduction in burden and associated i

4.

Non-labor costs for the GHGRP were estimated to be \$8,400,000 (2021\$) in

non-labor costs.



Subpart (1)	ICR Labor Category	BLS Citation
All	Technical(2)	SOC 17-2112 (Industrial Engineer), top-level
	Managerial(2)	SOC 11-3051 (Industrial Production Manager), top-level
	Administrative Support (3)	Office and Administrative Support
	Legal(2)	SOC 23-1011 (Lawyer)
W/RR	Legal(2)	SOC 23-1011 (Lawyer)
	Middle Manager(6)	NAICS 211100 (Oil and Gas Extraction); SOC 11-1021 (General and Operations Managers)
	Senior Manager(6)	NAICS 211100 (Oil and Gas Extraction); SOC 11-3051 (Industrial Production managers)
	Engineers(6)	NAICS 211100 (Oil and Gas Extraction); SOC 17-2112 (Industrial Engineers)
	Technicians(6)	NAICS 211100 (Oil and Gas Extraction); SOC 17-3024 (Electro-Mechanical and Mechatronics Technologists and Technicians)

(1) Technical, Managerial, Administrative Support, and Legal are used for all subpa

(2) The base hourly wages & salaries (not including benefits & overhead) for all cat Employment and Wage Statistics, Cross-industry, Private, Federal, State, and Local C

U.S. Bureau of Labor Statistics (BLS) – Occupational Employment and Wage Statisti Engineering Occupations. Wages found under Major Occupation Group 17-0000 Arcl

(3) The base hourly wages & salaries (not including benefits & overhead) for admin

BLS’s “Employer Costs for Employee Compensation – March 2024, page 7: Table 4. wages and salaries.

(4) The benefits loading factor is calculated using data from: BLS’s “Employer Costs industry group: To calculate the benefits loading factor for Technical, Managerial, Le benefits” to “wages and salaries” in the first row,  $(29.7/70.3) = 0.4225$ , rounded to 0.4

(5) The overhead loading factor of 17 % (0.17) is from EPA-HQ-OPPT-2010-0572-Program,” Analytical Support Branch, Environmental Analysis Division, Office of Er

- (6) The mean hourly wage and salaries for middle manager, senior manager, engineer, and other professional occupations. Source: U.S. Department of Labor Statistics – Occupational Employment and Wage Statistics – May 2024 National data.
- (7) The loaded hourly rate = Wages & Salaries + (Wages & Salaries \* Benefits Load Factor)

Labor Rates for the 2025 Proposed Reconsideration			
Mean Hourly Wage & Salaries (2024\$)	Benefits Loading Factor (4)	Overhead Loading Factor (5)	Loaded Hourly Rates Used in ICRs (2024\$)(7)
\$ 51.87	0.423	0.17	\$82.63
\$ 62.11	0.423	0.17	\$98.94
\$ 23.12	0.423	0.17	\$36.83
\$ 87.86	0.423	0.17	\$139.96
\$ 104.35	0.423	0.17	\$166.96
\$ 93.71	0.423	0.17	\$151.15
\$ 87.50	0.423	0.17	\$141.14
\$ 81.44	0.423	0.17	\$131.28
\$ 49.49	0.423	0.17	\$79.83

arts. In addition to these rates, specialized rates are used for subparts W and RR.

egories except administrative support are from: <https://www.bls.gov/oes/tables.htm>, National Occupational  
government Period: May 2024: <https://data.bls.gov/oes/#/industry/000000>

cs - May 2024 National Occupational Employment and Wage Estimates – United States. 17-0000 Architecture and  
hitecture and Engineering Occupations.

administrative support are from <https://www.bls.gov/web/ecec/ececqrtn.pdf>.

Private Industry workers, by occupational and industry group: Office and administrative support occupations –

s for Employee Compensation – March 2024, page 7: Table 4. Private Industry workers, by occupational and  
egal, Middle Manager, Senior Manager, Engineers, and Technicians, we used the ratio of the percentage of “total  
123.

0061\_content.pdf: Rice, Cody 2002. "Wage Rates for Economic Analyses of the Toxics Release Inventory  
nvironmental Information, U.S. EPA, April 11, 2002, page 3.

ner, and technician, for subparts W and RR, are from <https://data.bls.gov/oes/#/industry/211000>. U.S. Bureau of  
al Industry-Specific Occupational Employment and Wage Estimates – NAICS 211100 – Oil and Gas Extraction.  
ding Factor) + (Wages & Salaries \* Overhead Loading Factor).

Chemical Engine

2021
2022
2023
2024

ering Plant Cost Index (CEPCI)

<b>708</b>
<b>816</b>
<b>797.9</b>
<b>796.2</b>

Ratio to scale 2021\$ to 2024\$

1.124576