Table 7: Annual Total SLT Burden and Cost by Activity (excluding oper

	EIS	
Information Collection Activity	**No. of SLTs**	**Total Hours/ Year**
Annual Required, Point Sources	56	2,979
Triennial Required, Point Sources	56	4,247
Triennial Required, Other Sources[a]	63	37,800
Labor Subtotal (Required)		**45,026**
One-Time Voluntary: CAERS	0	0
Annual and Triennial Voluntary	56	6,104
Total Voluntary		**6,104**

[a] Costs associated with this activity are not broken out by CAERS cases. All costs are inclu

Table 9: Annual Total Owner/Operator Respondent Burden and Cost by Activity

Information Collection Activity	**Number of Facilities/year**	**Total Hours/ Year**
Required activities		
1. Report annual CAPs by facility to states for use in triennial (2026) AERR report	5,800	144,993
2. Report annual CAPs by facility to states for use in 2025 and 2027 AERR reports		
Voluntary activities for triennial inventory years		
3. Provide rail yard data to the EPA for 2026 (in 2027)	7	84

Table 12: Annual operations and maintenance (O&M) burden **for SLT data systems**

Information Collection Activity	Ave. No. of SLTs	Total Hours/ Year
Point Data Collection System O&M - EIS	56	143,696
Point Data Collection System O&M - CAERS Case 3	2	3,384
Point Data Collection System O&M - CAERS Case 4	10	6,010
Capital and Maintenance	68	0
Total		**153,090**

Table 13: Total Estimated Annual Respondent and EPA Burden and Co

Burden Element/Cost	SLTs	Owners/ Operators
Number of Respondents	68	5,807
Total Hours Per year (including voluntary)	53,482	145,077
Annual Capital Cost	$102,000	$0
Annual O&M Cost	$15,028,399	$0
Total Annual Capital and O&M Costs	$15,130,399	$0
Labor Cost Per Year (including voluntary)	$4,723,639	$16,578,243
Total Cost Per Year	**$19,854,038**	**$16,578,243**

ations and maintenance)

	CAERS Case 3			
Total Cost/ Year	**No. of SLTs**	**Total Hours/ Year**	**Total Cost/ Year**	**No. of SLTs**
$271,682	2	80	$7,302	10
$397,459	2	103	$9,733	10
$3,284,946				
$3,954,088		**183**	**$17,035**	
$0	0	0	$0	5
$549,416	2	46	$4,259	10
$549,416		**46**	**$4,259**	

ded with the group for EIS.

Total Cost/ Year
$16,567,945
$10,298

$5,522,648 (Weighted ave per year per facility)

Total Cost/ Year
$14,035,411
$334,197
$556,792
$204,000
$15,130,399

Capital cost / SLT =	$1,500
Capital maintenance cost / SLT =	$1,500
	$3,000

ost Summary for 2026 through 2028

EPA	Total
	5,875
31,824	230,383
$403,000	$505,000
$2,425,000	$17,453,399
$2,828,000	$17,958,399
$2,539,800	$23,841,682
$5,367,800	**$41,800,081**

EPA costs worksheet	
15.3	FTEs
31,824	FTE Hours/year
$ 166,000	EPA Labor Rate, 2
$300,000	EIS and CAERS ca
$1,300,000	EIS Contractor
$325,000	CAERS Contracto
$800,000	NEI Contractor co
$2,539,800	**Total FTE Costs**
$2,425,000	**Total D&O&M c**

CAERS Case 4		Total	
Total Hours/ Year	**Total Cost/ Year**	**Hours/ Year**	**Costs/ Year**
152	$14,863	3,211	$293,848
256	$25,221	4,606	$432,412
		37,800	$3,284,946
408	**$40,084**	**45,617**	**$4,011,207**
1,613	$148,736	1,613	$148,736
102	$10,021	6,252	$563,696
1,715	**$158,757**	**7,865**	**$712,432**

2022, GS13, step 7, with 26% overhead
aptial costs (working capital)

r

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Table 14: Burden Change

	Currently Approved ICR
SLTs	
Annual Responses	85
Annual Respondent Hour Burden	48,702
Annual Respondent Cost Burden	$4,960,908
Owners/Operators	
Annual Responses	0
Annual Respondent Hour Burden	0
Annual Respondent Cost Burden	$0
EPA	
All EPA Costs	$5,589,000

Change	Total Requested
-17	68
+4,780	53,482
$14,893,130	$19,854,038
+5,807	5,807
+145,077	145,077
$16,578,243	$16,578,243
-$221,200	$5,367,800

Estimated number of agencies reporting

Agency Type	Triennial Point reporting agencies	2020 Point	2023 Point
State	52	52	52
Local	9	9	9
Tribal (voluntary)	5	5	2
Total	66		
+ Guam and VI	68		

Inventory years:	**2025**	**2026**	**2027**
Calendar Year	**CY 2026**	**CY 2027**	**CY 2028**

Point Assumptions Note: see also worksheet at right in Table 6 column

SLT Using CAERS	9	12	14
SLT Not using CAERS	59	56	54
SLT Report HAP	75	75	70

SLT Adopts facility HAP direct to EPA reporting			
SLT Report HAP w/ CAERS	9	12	14
SLT Report HAP w SLT system or CAERS case 1 or 2 (future)	66	63	56

Nonpoint- and mobile-related counts

Number of input templates for WW	92	
Number of WW sectors	20	
Number of non-WW EPA sectors	5	Notes: oil & gas, ag fertilizer, livestock,
No. states with rail yards	43	
No. locals with rail yards	9	
Number of SLTs with CMV activity	42	
Number of SLTs submitting data for non-EPA sectors		
No. SLTs reporting MOVES	62	

Events-related Assumptions

Number of SLTs with Rx fires occurring	52	
Number of SLTs already reporting Rx fires:	20	
Number of SLTs with wildfires	50	
Number of SLTs voluntarily reporting wildfires data	15	
Number of states voluntarily reporting ag fires under new approach	6	
Number of SLTs reporting ag fires in 2017	10	6 states and 4 tribes. See 2017 NEI TSD

Tribal-nonpoint Assumptions

States overlapping reporting tribes	5	
No. counties overlapping reporting tribes	17	
Number tribes reporting nonpoint	5	
Average number of hours per county adjusted for tribal emissions	16	

Tribal details

	2020 report	2017 report?	State(s) NP overlap	Count of overlap counties

Coeur d’Alene Tribe	P,NP,OR, NR	P,NP,OR, NR	ID	2
Kootenai Tribe of Idaho	NP,OR,NR	NP,OR,NR	ID	1
Nez Perce Tribe	P,NP,OR, NR	P,NP,OR, NR	ID	4
Northern Cheyenne Tribe	P, NP,OR,NR	P,NP,OR, NR	MT	2
Salt River Pima Maricopa India		P,NP	AZ	1
Shoshone-Bannock Tribes of the	P,NP,OR, NR	P,NP,OR, NR	ID	4
Southern Ute Indian Tribe	P,NP	P,NP	CO	2
Ute Mountain Tribe of the Ute M		P		
Yakama Nation Reservation		P		

Ute Indian Tribe of the Uintah & Ouray Reservation, Utah Reported by EPA Region 8	P

2020 Nonpoint	2023 Nonpoint (as of 5/28/25)
23	17
5	4
5	2

portable fuel containers, stage II gasoline (via MOVES

Reference

http://idsmok

https://commons.wikimedia.org/wiki/File:2490R_North
https://commons.wikimedia.org/wiki/File:Maricopa_Co

See link above for ID

https://en.wikipedia.org/wiki/Southern_Ute_Indian_Re

Table 2: State respondent voluntary burden for one-time point

Activity	Hours Per R	
	Engineering Managerial Hours	**Scientist Technical Hours**
CAERS Case 3 and 4		
1. Update and deliver training to owners/operators about new reporting approach	24	240
2. Curate list of facilities to remove duplicates	16	160
3. Other coordination activities including ensuring any CAERS customizations meet SLT requirements.	48	480
CAERS Case 3		
4. Modify SLT system to receive data from CAERS user interface.	104	
SubTotal Case 3	**192**	**880**
SubTotal - Case 4	**88**	**880**

Table 3: Annualized one-time burden per State respondent

Activity	Manager Hrs/Yr @ $168.10	Scientist Hrs/Yr @ $84.60

Point Sources Optional Activities		
Transition Tasks for CAERS Case 3	64	293
Transition Tasks for CAERS case 4	29	293

)

hern_Cheyenne_Indian_Reservation_Locator_Map.svg
ounty_Incorporated_and_Planning_areas_SRPMIC_highlighted.svg

servation#/media/File:3925R_Southern_Ute_Reservation_Locator_Map.svg

source activities when using CAERS

espondent	
IT Admin Hours	**Total**
	264
	176
	528
1,040	1,144
1,040	**2,112**
	968

IT Hrs/Yr @ $96.68	**Hours/Yr**	**Labor Cost/Year**

347	704	$69,089
0	323	$29,747

Note: see definition of "State" used on page 2 of the ICR supporting statement (it includ

Table 4: State point source reporting burden hours by activity

Activity	Hours Per R	
	Engineering Managerial Hours	**Scientist Technical Hours**
Point sources - Annual (required and voluntary)		
1. Quality assurance of submitted data and revision support	2	24
2. Extract data from the state data system		4
3. Convert data into the XML format – facility attributes information		8
4. Convert data into the XML format – annual emissions information		4
5. Run EIS quality-assurance checks and resolve critical errors	2	24
6. Submit final file to the EPA via CDX		2
7. Respond to follow-up inquiries from the EPA	2	4
Subtotal Annual Point Source Reporting via EIS	**6**	**70**
Subtotal Annual Point Source Reporting via CAERS Case 3	**4**	**46**
Subtotal Annual Point Source Reporting via CAERS, Case 4	**3**	**16**
Point sources - Triennial CAPs (required and voluntary), additional hours		

1. Quality assurance of submitted data and revision support	12	120
2. Extract data from the state data system	0	4
3. Convert data into the XML format – facility attributes information	0	16
4. Convert data into the XML format – annual emissions information	0	8
5. Run EIS quality-assurance checks and resolve critical errors	12	120
6. Submit final file to the EPA	1	2
7. Respond to follow-up inquiries from the EPA	10	20
Subtotal Triennial Point Source Reporting Increment via EIS – all point sources via EIS	**35**	**290**
Subtotal Triennial Point Sources Reporting Increment via CAERS Case 3	**23**	**170**
Subtotal Triennial Point Source Reporting Increment via CAERS Case 4	**16**	**80**

Worksheet: Assumptions about SLT use of CAERS by case and year

CAERS Cases	**CY 2026**	**CY 2027**
Cases 1 and 2 (0%)	0	0
Case 3 (50%)	2	2

Case 4 (50%)	7	10
Total	**9**	**12**

Not using CAERS	**59**	**56**
Not using CAERS or CAERS Case 1 or 2	**59**	**56**
Using CAERS Case 3 or 4	**9**	**12**
Inventory years:	**2025**	**2026**

Table XX: Calculations for annual average number of point source re

	Hours Per Respondent	
	CAPs	
Hours Calculations	**Engineering Managerial Hours/yr**	**Scientist Technical Hours/Yr**
2025 and 2027 emissions reporting without CAERS	4.20	49
2025 and 2027 emissions reporting with CAERS, Case 3	3.20	36.80
2025 and 2027 emissions reporting with CAERS, Case 4	2.40	12.80
2026 emissions reporting, 3-year average triennial increment without CAERS	8.17	67.67

2026 emissions reporting, 3-year average, triennial increment with CAERS, case 3	6.13	45.33
2026 emissions reporting, 3-year average, triennial increment with CAERS, case 4	4.27	21.33

es delegated Locals, for example)

Respondent	
Total	**Applies to CAERS Cases?**
26	3 @ 100%, 4 @ 50%
4	3
8	3
4	3
26	
2	3, 4
6	3, 4
76	**Hours Reduction**
50	34%
19	75%

132	3 @ 100%, 4 @ 50%
4	3
16	3
8	3
132	
3	3, 4
30	3, 4
325	**Hours Reduction**
193	**41%**
96	**70%**

CY 2028	**Average**
0	0
2	2

12	10
14	12

54 **56**

54 **56**

14 **12**

2027

eporting hours for different cases

Hours Per Respondent		
Voluntary HAPs		**% Effort HAP**
Engineering Managerial Hours/Yr	**Scientist Technical Hours/Yr**	
1.80	21	30%
0.80	9.20	20%
0.60	3.20	20%
3.50	29	30%

1.53	11.33	20%
1.07	5.33	20%

Table 5a: State (not local or tribal) nonpoint, mobile, and other sourc

Activity	State count	Hours
		Engineering Managerial Hours
Required activities		
1. Report nonpoint emissions, report tool inputs, or review, comment and/or accept EPA data (for sources included in EPA tools)	54	84
2. Report nonpoint emissions for sources not included in EPA tools	18	12
3. Adjust nonpoint submissions for boundaries of Indian country	4	3
4.Report aircraft and ground support emissions or review, comment, and/or accept EPA airport activity data	54	2
5. Report rail yard emissions or review, comment, and/or accept EPA emissions estimates or EPA activity data	43	1
6. Report commercial marine vessel (CMV) and locomotive emissions data or review, comment, and/or accept EPA emissions estimates.	42	4
7. For all states but California, report MOVES inputs	53	6
8. For California, report onroad and nonroad emissions	1	9
Average hours per state, required activities	**54**	**96**
Voluntary Activities		
9. Report documentation for nonpoint	13	14

10. Report documenation for aircraft, ground support equipment, and/or rail yards	5	2
11. Comment on prescribed fire and wildfire activity data, submit activity data, or submit emissions	20	8
12. Format and submit season-day emissions (includes point also)	9	1
Average hours per state, voluntary activities	**20**	**18**

Table 5b: Assumptions and calculations for State nonpoint tool submi

Review/Prepare/Submit inputs or emissions for sectors with EPA tools (Activity 1)	**No. States**	**Basis**
Prepare/Submit Wagon Wheel Input templates	36	Per template
Review/accept Wagon Wheel Input templates	54	Per template
Prepare/report O&G inputs	16	Per sector
Review/Accept O&G inputs	22	Per sector
Review/comment/accept other tool inputs (except CMV)	54	Per sector
Prepare/submit emissions for sectors with EPA tools (except O&G)	13	Per sector
Prepare/submit emissions for O&G	10	Per sector
Complete Nonpoint Survey (approach to accept EPA inputs/estimates)	54	all

SubTotal		
Prepare/Submit emissions for sectors without EPA tools (Activity 2)	**No. States**	**Basis**
Prepare/Submit emissions for sectors without EPA tools	18	Per sector

Table 5c: Local and tribal nonpoint, mobile, and other sources burden

Activity	**Entity count**	**Hours**
		Engineering Managerial Hours
Required activities		
1. Report nonpoint emissions, report tool inputs, or review, comment and/or accept EPA data (for sources included in EPA tools)	5	26
2. Report nonpoint emissions for sources not included in EPA tools	2	4
3. Adjust nonpoint submissions for boundaries of Indian country	0	0
4.Report aircraft and ground support emissions or review, comment, and/or accept EPA airport activity data	9	3

5. Report rail yard emissions or review, comment, and/or accept EPA emissions estimates or EPA activity data	9	2
6. Report commercial marine vessel (CMV) and locomotive emissions data or review, comment, and/or accept EPA emissions estimates.	0	0
7. Report MOVES inputs	9	2
8. For local agencies, coordinate with state agencies to complete stationary nonpoint, nonroad mobile, and onroad mobile sources for all pollutants	9	4
Average hours per entity, required activities	**9**	**24**
Voluntary activities		
9. Report documentation for nonpoint and mobile (locals and Tribes)	7	5
10. Report documenation for aircraft, ground support equipment, and/or rail yards	7	2
11. Tribes report emissions other than point	5	7
Average hours per entity, voluntary activities	**7**	**12**

es burden hours by activity

s Per Respondent		State/Local	
Scientist Technical Hours	Total	Engineering Managerial Hours	Engineering Technical Hours
		79	1,579
1,679	1,763	11	223
240	252	3	54
54	57	2	42
40	42	1	20
16	17	4	80
80	84	5	108
120	126		
180	189		
1,915	**2,011**		

		Max State count + Local/Tribal	Engineering Managerial Hours
280	294	20	12.05

40	42
160	168
10	11
357	**375**

ssions (activities 1 and 2)

Average Submitted Templates or Sectors Per State	Average Hours/ Template or sector	Total for All States Performing Sub-task	Average Hours Across All States
12	20	8,640	1,168
84	12	54,432	
1	40	640	17
1	12	264	
4	12	2,592	48
11	80	11,440	212
1	120	1,200	22
1	2	11,440	212

1231

			1,679
Average Submitted Templates or Sectors Per State	**Average Hours/ Template or sector**	**Total for All States Performing Sub-task**	**Average Hours Across All States**
2	120	4,320	80

hours by activity

s Per Respondent	
Scientist Technical Hours	**Total**
504	530
72	76
0	0
55	58

40	42
0	0
40	42
80	84
511	**535**
84	89
40	42
122	129
211	**223**

l Wghted Hours averages
Total hours incl. S+L and weighted averages (div. by 3 for annual)
32,617
1,563
4
930
448
1,176
2,352
63

Engineering Technical Hours
235.40

Activity	Count
Number of input templates per state/local	92
Number of states/locals submitting templates for 2020 NEI at date of this calculation?	36
How many templates submitted in total across all sectors at date of this calculation?	179
Additional required templates that haven't been received as of the date of this calculation across all S/Ls?	22
Number of states/locals submitting emissions to date as of the date of this calculation?	26
Number of state/local-sector combinations for emissions submissions as of date of this calculation	290

No. sectors not WW, O&G, or CMV	4
No. states/locals submitting O&G emissions	10
No. states/locals submitting O&G inputs	6

Table 6a: Annualized Burden of NEI submission per Respondent for EIS

Information Collection Activity	State, local, or tribal count	Manager Hrs/yr @	Scientist Hrs/yr @
Annual Required Activities		$168.10	$84.60
Submit annually reported point sources CAPs with EIS (see Table 4)	56	4	49
Point Source Triennial Required Activities			
Submit additional triennial point sources CAPs with EIS (see Table 4)	56	8.17	67.67
Average Burden per Entity, Required Point Source Activities	**56**	**246**	**1,289**
Other Triennial Required Activities		$163.98	$82.99
States: submit triennial nonpoint; mobile sources/MOVES inputs (see Table 5a)	54	32	638.33
Local agencies: nonpoint, mobile sources/MOVES inputs (see Table 5c)	9	8	170.33
Average Burden per Entity, Required Other Triennial Activities	**63**	**29**	**571**
Voluntary Activities (Triennial hours from other tables divided by 3 to annualize)			
State annual and triennial voluntary point source HAP reporting with EIS (see Table 4)	56	5	50
State voluntary triennial data reporting activities (see Table 5a)	20	6	119
Local and tribal voluntary triennial data activities (See Table 5c)	7	4	70

Average Burden per Entity, Voluntary Activities	**56**	**8**	**101**

$168.10 $84.60

Table 6b: Annualized Burden **Changes** per Respondent of NEI Submis

Information Collection Activity	Manager Hrs/yr @ $168.10/Hr	Scientist Hrs/yr @ $84.60/Hr	Total Hours Change/ Year
CAERS Case 3 Burden Changes			
Annual point source CAP reporting (see Table 4b)	-1	-12.2	-13.2
Triennial point source CAP reporting (see Table 6b)	-2.0	-22.3	-24.4
State annual and triennial voluntary point source HAP reporting with CAERS Case 3	-3.0	-29.5	-32.4
Subtotal Case 3	**-6**	**-64**	**-70**
CAERS Case 4 Burden Changes			
Annual point source CAP reporting (see Table 6b)	-1.8	-36.2	-38.0
Triennial point source CAP reporting (see Table 6b)	-3.9	-46.3	-50.2
State annual and triennial voluntary point source HAP reporting with CAERS Case 4	-3.6	-41.5	-45.1

Subtotal Case 4	**-9**	**-124**	**-133**

S Approach

Total Hours/ Year	Cost/Year
53	$4,851
76	$7,097
2,695	**$11,949**
670	$58,222
178	$15,448
600	**$52,142**
55	$5,121
125	$10,860
74	$6,493

109	**$9,811**

sion for CAERS Cases 3 and 4 Ap

Cost Change/ Year
-$1,200
-$2,231
-$2,992
-$6,423
-$3,365
-$4,575
-$4,119

-$12,059

Table 10: SLT data system operation and maintenance hours for NE

Activity	Hours Per R	
	Engineering Managerial Hours	**Scientist Technical Hours**
1. Collection system operation & maintenance (O&M)	112	80
2. Update collection system with new codes, emission factors, and other new information for reporting year	12	40
3. User support and training for point source emissions data reporting	110	1,052
Subtotal for System O&M EIS and CAERS Case 1 & 2	**234**	**1,172**
Subtotal for System O&M with CAERS Case 3	**154**	**622**
Subtotal for System O&M with CAERS Case 4	**55**	**526**

$ 168.10

Table 11: Agency average burden of data system operation and ma

Point source data collection system operations and maintenance for…	**State, local, or tribal count**	**Manager Hrs/yr @ $168.10/Hr**
EIS reporting	56	234

CAERS Case 3	2	154
CAERS Case 4	10	55
Total and Weighted Average	68	205.3

proach

I collection from owners/operators

Respondent		
IT Admin Hours	**Total**	**Applies to CAERS Cases?**
1,040	1,232	Case 3 @ 80%
80	132	Case 3 @ 80%
40	1,202	Case 3 @ 50%, case 4 @ 50%
1,160	**2,566**	**Hours Reduction**
916	**1,692**	**34%**
20	**601**	**77%**

$ 84.60 $ 96.68

intenance costs for NEI collection from owners/operators

Scientist Hrs/yr @ $84.60/Hr	IT Hrs/yr @ $96.68/Hr	Total Hours/ Year	Cost/Year
1,172	1,160	2,566	$250,632

622	916	1,692	$167,098
526	20	601	$55,679
1060.8	985.2	2251.3	$219,506

Inventory years: **2027**

Estimated Reporting Entities	**CY 2028**
No. Requ'd HAP/CAP Major	1,654
No. Requ'd CAP Major	856
No. Required HAP Major	0
No. Total Required Major	2,510
No. Voluntary HAP Major	546
No. Voluntary HAP/CAP Major	3,011
No. Voluntary CAP Major	1,557
No. Voluntary Non-Major	13,548
No. Voluntary HAP facilities from SLT	15,213
No. Voluntary total	18,662
No. HAP or HAP/CAP Major	2,200
No. CAP or HAP/CAP Major	7,078
No. Total Major	7,624
Total Submitted by SLTs	21,172
Total w/ HAP submitted By SLTs	15,213
No. Facilities reporting to EIS and TRI	4,931

2026	2025	This ICR	
CY 2027	CY 2026	Average per Year	Notes
7,737	1,654	3,682	
4,643	856	2,118	
0	0	0	
12,379	2,510	5,800	
1,041	546	711	
0	3,011	2,007	
0	1,557	1,038	
64,066	13,548	30,387	
55,677	15,213	28,701	
65,107	18,662	34,144	
8,777	2,200	4,393	
12,379	7,078	8,845	
13,420	7,624	9,556	
77,486	21,172	39,943	
55,677	15,213	28,701	
7,330	4,931	5,731	

Raw Data for Calculating Estimated Number of Major Sources for Burden

	Facilities from 2017 RAS* or 2020 RAS (see comments)	Facilities from 2018 RAS*
No. HAP Major ID'd	840	546
No. HAP/CAP ID's	6,244	4,665
No. CAP Major ID'd	3,747	2,413
No. Total Major ID'd	10,831	7,624
Total Submitted	77,486	21,172

* RAS = Responsible Agency Selection, which represen

Note: the older inventory years used here would tend t
of sources above the thresholds goes down over

ıts only what the states have reported directly to the EPA
:o overestimate the number of sources, since the numbers
time.

Table 1a: Labor rates (unused) for state versus private employers

Employee	Employer
Environmental Engineer	Any
Architectural and Engineering Managers	Any

* BLS as of May 2024, downloaded on 5/28/2025

Table 1b: Weighted Labor rates for point sources

Employee	Employer
Environmental Engineer	Any
Environmental Scientists and Specialists, Including Health	Any
Architectural and Engineering Managers	Any
Network and Computer Systems Administrator	Any

Table 1c: Weighted Labor rates for nonpoint, mobile, and fire sources

Employee	Employer
Environmental Engineer	Any
Environmental Scientists and Specialists, Including Health	Any
Architectural and Engineering Managers	Any
Network and Computer Systems Administrator	Any

These rates not used (they would have been used except that we addresed the commen

Employee	Employer
Environmental Engineer	State Government

Architectural and Engineering Managers	State Government
Network and Computer Systems Administrator	State Government

Mean Hourly Wage*	Loaded Hourly Rate
$53.16	$111.64
$84.48	$177.41

Weighted Hourly Wage	Loaded Hourly Rate
$51.70	$108.57
$40.29	$84.60
$80.05	$168.10
$46.04	$96.68

Weighted Hourly Wage	Loaded Hourly Rate
$50.37	$105.77
$39.52	$82.99
$78.08	$163.98
$45.14	$94.80

t about region-specific labor r

Mean Hourly Wage*	Loaded Hourly Rate
$45.97	$96.54

$70.38	$147.80
$43.38	$91.10

Source (via https://www.bls.gov/oes/tables.htm)

https://www.bls.gov/oes/special-requests/oesm24nat.zip
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Source (via https://www.bls.gov/oes/tables.htm) + Calculations included in this spreadsheet based on table at the right

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Source (via https://www.bls.gov/oes/tables.htm) + Calculations included in this spreadsheet based on table at the right

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Source (via https://www.bls.gov/oes/tables.htm)

https://www.bls.gov/oes/special-requests/oesm24in4.zip

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https://www.bls.gov/oes/special-requests/oesm24in4.zip

--> Hourly wage and

Postal State Code	FIPS State Code	No. Counties	No. Triennial Expected Facilities	Architectural and Engineering Managers
AL	01	67	227	$77.37
AK	02	30	100	$77.70
AZ	04	15	62	$94.92
AR	05	75	121	$67.69
CA	06	58	256	$98.85
CO	08	64	150	$91.47
CT	09	9	32	$84.32
DE	10	3	10	$83.85
DC	11	1	5	$85.77
FL	12	67	238	$81.64
GA	13	159	213	$76.62
HI	15	5	20	$69.88
ID	16	44	37	$76.91
IL	17	102	299	$77.66
IN	18	92	282	$72.84
IA	19	99	180	$70.01
KS	20	105	154	$76.89
KY	21	120	193	$68.78
LA	22	64	331	$83.14
ME	23	16	40	$72.10
MD	24	24	44	$81.66
MA	25	14	53	$93.29
MI	26	83	241	$77.34
MN	27	87	190	$83.52
MS	28	82	162	$65.01
MO	29	115	129	$74.83
MT	30	56	42	$67.07
NE	31	93	74	$67.89
NV	32	17	36	$75.95
NH	33	10	13	$85.43
NJ	34	21	72	$90.36

NM	35	33	112	$100.83
NY	36	62	203	$89.19
NC	37	100	208	$80.27
ND	38	53	42	$70.90
OH	39	88	243	$78.02
OK	40	77	215	$80.12
OR	41	36	96	$83.58
PA	42	67	260	$75.36
RI	44	5	14	$86.40
SC	45	46	160	$79.16
SD	46	66	32	$76.87
TN	47	95	150	$75.06
TX	48	254	635	$88.67
UT	49	29	47	$75.46
VT	50	14	6	$78.24
VA	51	133	164	$84.59
WA	53	39	81	$93.82
WV	54	55	99	$73.48
WI	55	72	220	$71.33
WY	56	23	92	$71.83
GU	66	1		$49.65
PR	72	78	19	$59.22
VI	78	3		
		3,226	7,104	

benefits from State_M2024_dl_Modified 08-08-2024.xlsx

Environmental Engineers	Environmental Scientists and Specialists, Including Health	Network and Computer Systems Administrators
$49.89	$36.64	$41.72
$55.52	$46.30	$45.34
$45.45	$42.90	$45.57
$44.08	$41.90	$40.23
$61.41	$51.64	$55.05
$49.47	$44.81	$51.11
$56.10	$46.06	$51.60
$54.58	$31.62	$46.74
$58.72	$61.23	$57.17
$45.60	$32.70	$46.19
$48.84	$47.61	$47.03
$56.03	$37.59	$49.00
$47.21	$34.95	$46.83
$59.45	$46.96	$47.68
$54.34	$40.06	$41.73
$47.90	$38.00	$41.91
$48.63	$40.23	$41.78
$52.76	$33.15	$41.41
$59.54	$38.01	$45.50
$43.99	$32.35	$39.28
$50.79	$43.44	$58.66
$57.15	$47.76	$52.89
$49.64	$39.26	$46.05
$50.95	$42.73	$47.40
$40.63	$32.16	$37.08
$42.01	$33.89	$43.25
$48.75	$38.77	$38.06
$46.06	$32.36	$43.41
$56.84	$42.25	$48.93
$44.07	$40.93	$46.76
$54.12	$41.08	$51.42

$57.94	$41.80	$44.58
$50.73	$42.83	$53.58
$51.87	$35.89	$47.91
$54.04	$38.11	$40.38
$49.09	$40.32	$46.54
$46.61	$36.72	$44.97
$62.92	$46.15	$49.11
$48.20	$38.35	$45.40
$51.95	$45.90	$51.28
$48.67	$38.67	$45.06
$43.89	$35.30	$35.81
$46.88	$42.08	$50.36
$57.05	$42.42	$47.20
$49.37	$40.93	$47.83
$43.85	$34.77	$42.28
$55.08	$41.78	$54.80
$58.05	$45.65	$53.26
$49.31	$38.59	$39.07
$48.05	$36.60	$43.35
$50.24	$37.25	$38.27
	$32.98	
$35.82	$26.30	$27.31
	$28.02	

--> County weighted (rate * no counties)

Architectural and Engineering Managers	Environmental Engineers	Environmental Scientists and Specialists, Including Health	Network and Computer Systems Administrators
$5,183.79	$3,342.63	$2,454.88	$2,795.24
$2,331.00	$1,665.60	$1,389.00	$1,360.20
$1,423.80	$681.75	$643.50	$683.55
$5,076.75	$3,306.00	$3,142.50	$3,017.25
$5,733.30	$3,561.78	$2,995.12	$3,192.90
$5,854.08	$3,166.08	$2,867.84	$3,271.04
$758.88	$504.90	$414.54	$464.40
$251.55	$163.74	$94.86	$140.22
$85.77	$58.72	$61.23	$57.17
$5,469.88	$3,055.20	$2,190.90	$3,094.73
$12,182.58	$7,765.56	$7,569.99	$7,477.77
$349.40	$280.15	$187.95	$245.00
$3,384.04	$2,077.24	$1,537.80	$2,060.52
$7,921.32	$6,063.90	$4,789.92	$4,863.36
$6,701.28	$4,999.28	$3,685.52	$3,839.16
$6,930.99	$4,742.10	$3,762.00	$4,149.09
$8,073.45	$5,106.15	$4,224.15	$4,386.90
$8,253.60	$6,331.20	$3,978.00	$4,969.20
$5,320.96	$3,810.56	$2,432.64	$2,912.00
$1,153.60	$703.84	$517.60	$628.48
$1,959.84	$1,218.96	$1,042.56	$1,407.84
$1,306.06	$800.10	$668.64	$740.46
$6,419.22	$4,120.12	$3,258.58	$3,822.15
$7,266.24	$4,432.65	$3,717.51	$4,123.80
$5,330.82	$3,331.66	$2,637.12	$3,040.56
$8,605.45	$4,831.15	$3,897.35	$4,973.75
$3,755.92	$2,730.00	$2,171.12	$2,131.36
$6,313.77	$4,283.58	$3,009.48	$4,037.13
$1,291.15	$966.28	$718.25	$831.81
$854.30	$440.70	$409.30	$467.60
$1,897.56	$1,136.52	$862.68	$1,079.82

$3,327.39	$1,912.02	$1,379.40	$1,471.14
$5,529.78	$3,145.26	$2,655.46	$3,321.96
$8,027.00	$5,187.00	$3,589.00	$4,791.00
$3,757.70	$2,864.12	$2,019.83	$2,140.14
$6,865.76	$4,319.92	$3,548.16	$4,095.52
$6,169.24	$3,588.97	$2,827.44	$3,462.69
$3,008.88	$2,265.12	$1,661.40	$1,767.96
$5,049.12	$3,229.40	$2,569.45	$3,041.80
$432.00	$259.75	$229.50	$256.40
$3,641.36	$2,238.82	$1,778.82	$2,072.76
$5,073.42	$2,896.74	$2,329.80	$2,363.46
$7,130.70	$4,453.60	$3,997.60	$4,784.20
$22,522.18	$14,490.70	$10,774.68	$11,988.80
$2,188.34	$1,431.73	$1,186.97	$1,387.07
$1,095.36	$613.90	$486.78	$591.92
$11,250.47	$7,325.64	$5,556.74	$7,288.40
$3,658.98	$2,263.95	$1,780.35	$2,077.14
$4,041.40	$2,712.05	$2,122.45	$2,148.85
$5,135.76	$3,459.60	$2,635.20	$3,121.20
$1,652.09	$1,155.52	$856.75	$880.21
$49.65		$32.98	
$4,619.16	$2,793.96	$2,051.40	$2,130.18
		$84.06	
$78.08	**$50.37**	**$39.52**	**$45.14**

--> Point source weighted (rate * no counties)

Architectural and Engineering Managers	Environmental Engineers	Environmental Scientists and Specialists, Including Health
$17,562.99	$11,325.03	$8,317.28
$7,770.00	$5,552.00	$4,630.00
$5,885.04	$2,817.90	$2,659.80
$8,190.49	$5,333.68	$5,069.90
$25,305.60	$15,720.96	$13,219.84
$13,720.50	$7,420.50	$6,721.50
$2,698.24	$1,795.20	$1,473.92
$838.50	$545.80	$316.20
$428.85	$293.60	$306.15
$19,430.32	$10,852.80	$7,782.60
$16,320.06	$10,402.92	$10,140.93
$1,397.60	$1,120.60	$751.80
$2,845.67	$1,746.77	$1,293.15
$23,220.34	$17,775.55	$14,041.04
$20,540.88	$15,323.88	$11,296.92
$12,601.80	$8,622.00	$6,840.00
$11,841.06	$7,489.02	$6,195.42
$13,274.54	$10,182.68	$6,397.95
$27,519.34	$19,707.74	$12,581.31
$2,884.00	$1,759.60	$1,294.00
$3,593.04	$2,234.76	$1,911.36
$4,944.37	$3,028.95	$2,531.28
$18,638.94	$11,963.24	$9,461.66
$15,868.80	$9,680.50	$8,118.70
$10,531.62	$6,582.06	$5,209.92
$9,653.07	$5,419.29	$4,371.81
$2,816.94	$2,047.50	$1,628.34
$5,023.86	$3,408.44	$2,394.64
$2,734.20	$2,046.24	$1,521.00
$1,110.59	$572.91	$532.09
$6,505.92	$3,896.64	$2,957.76

$11,292.96	$6,489.28	$4,681.60
$18,105.57	$10,298.19	$8,694.49
$16,696.16	$10,788.96	$7,465.12
$2,977.80	$2,269.68	$1,600.62
$18,958.86	$11,928.87	$9,797.76
$17,225.80	$10,021.15	$7,894.80
$8,023.68	$6,040.32	$4,430.40
$19,593.60	$12,532.00	$9,971.00
$1,209.60	$727.30	$642.60
$12,665.60	$7,787.20	$6,187.20
$2,459.84	$1,404.48	$1,129.60
$11,259.00	$7,032.00	$6,312.00
$56,305.45	$36,226.75	$26,936.70
$3,546.62	$2,320.39	$1,923.71
$469.44	$263.10	$208.62
$13,872.76	$9,033.12	$6,851.92
$7,599.42	$4,702.05	$3,697.65
$7,274.52	$4,881.69	$3,820.41
$15,692.60	$10,571.00	$8,052.00
$6,608.36	$4,622.08	$3,427.00
$1,125.18	$680.58	$499.70
$80.05	**$51.70**	**$40.29**

Network and Computer Systems Administrators
$9,470.44
$4,534.00
$2,825.34
$4,867.83
$14,092.80
$7,666.50
$1,651.20
$467.40
$285.85
$10,993.22
$10,017.39
$980.00
$1,732.71
$14,256.32
$11,767.86
$7,543.80
$6,434.12
$7,992.13
$15,060.50
$1,571.20
$2,581.04
$2,803.17
$11,098.05
$9,006.00
$6,006.96
$5,579.25
$1,598.52
$3,212.34
$1,761.48
$607.88
$3,702.24

$4,992.96
$10,876.74
$9,965.28
$1,695.96
$11,309.22
$9,668.55
$4,714.56
$11,804.00
$717.92
$7,209.60
$1,145.92
$7,554.00
$29,972.00
$2,248.01
$253.68
$8,987.20
$4,314.06
$3,867.93
$9,537.00
$3,520.84

$518.89

$46.04

Table 8: Annual burden per facility for owners/operator reporting

Activity	Facility Count for 1 Year
Required activities	
1. Report annual CAPs by facility to states for use in triennial (2026) AERR report	12,379
2. Report annual CAPs by facility to states for use in 2025 and 2027 AERR reports	2,510
Required One-Time Activities	
Sub-total weighted average per year for required activities:	**12,379**
Voluntary activities for triennial inventory years	
3. Provide rail yard data to the EPA for 2026 (in 2027)	7

$177.41 $111.64

Ave. Facility Count Over 3 Years	Hours per Facility in 1 year			Total Cost/ Year
	Manager Hrs/yr @ $177.41/Hr	Engineer Hrs/yr @ $111.64/Hr	Total Hrs/Yr	
5,800	1	24	25	$2,857
	1	24	25	$2,857
5,800	**1.0**	**24.0**	**25.0**	**$2,857**
	2	10	12	$1,471

FR 1st notice text

Estimated number of respondents: 68

12,379 owners/operators reporting to state and local agencies

Total estimated burden: 60,497 hours per year,

including 14,516 for voluntary activities for State, local, Tribal air agencies

and 144,993 hours per year for owners/operators.

T*otal estimated cost*: $21,776,607 per year for State, local, and Tribal air agencies

including $1,449,776 for voluntary activities

and $15,756,457 in annualized capital, operation, and maintenance costs.

$16,567,945 per year for owners/operators.

Beyond those changes, the total hours per year for State, local, and Tribal air agencies for required activities has increased by 627 hours per year across all agencies, which reflects improved calculation approaches.

Workbook reference	Checks
SLT NEI burden details; Cell B9 (named cell: "NoSLTsReporting")	68
Facility counts worksheet; Cell B11	12,379
ICR Final Summary Tables/Table 10; cell B37	53,482
ICR Final Summary Tables/Table 8; cell K17	7,865
ICR Final Summary Tables/Table 10; cell C37	145,077
ICR Final Summary Tables/Table 8; cell L14 + L17	$712,432
ICR Final Summary Tables/Table 8; cell L17	$712,432
ICR Final Summary Tables/Table 10; cell B41	$15,130,399
ICR Final Summary Tables/Table 10; cell C44	$16,578,243
ICR Final Summary Tables: Table 10; cell K11 minus Table 11;cell O9	-3,085