

Appendix D:
Summary of Labor Rates Derivation

June 2019

Appendix D-1. Respondent Labor Rates

Subpart (1)	ICR Labor Category	Labor Rates for the 2019 Renewal ICR				
		BLS Citation	Wages & Salaries (2017\$) (3)	Benefits Loading Factor (4)	Overhead Loading Factor (5)	Loaded Hourly Rates Used in ICRs (2017\$)(6)
All (2)	Technical	SOC 17-2112 (Industrial Engineer), top-level	\$43.43	0.475	0.17	\$71.45
	Managerial	SOC 11-3051 (Industrial Production Manager), top-level	\$53.16	0.475	0.17	\$87.45
	Administrative Support (3)	N/A	\$22.07	0.474	0.17	\$36.28
	Legal	SOC 23-1011 (Lawyer)	\$68.22	0.475	0.17	\$112.23
W and RR	Legal	SOC 23-1011 (Lawyer)	\$68.22	0.475	0.17	\$112.23
	Middle Manager	NAICS 211 (Oil and Gas Extraction); SOC 11-3051 (Industrial Production Managers)	\$64.24	0.475	0.17	\$105.68
	Senior Manager	NAICS 210001 (Oil and Gas Extraction); SOC 11-1021 (Gen & Op Mngr)	\$86.04	0.475	0.17	\$141.54
	Engineers	NAICS 211000 (Oil and Gas Extraction); SOC 17-2112 (Ind. Engineers)	\$55.35	0.475	0.17	\$91.06
	Technicians	NAICS 211000 (Oil and Gas Extraction); SOC 17-3024 (Electro-Mechanical Technicians)	\$36.91	0.475	0.17	\$60.72

- (1) Technical, Managerial, Administrative Support, and Legal are used for all subparts. In addition to these rates, specialized rates are used for subparts W and RR.
- (2) The base hourly wages & salaries (not including benefits & overhead) for all categories except administrative support are from Bureau of Labor and Statistics (BLS) May 2017 National Industry-Specific Occupational Employment and Wage Estimates (<http://www.bls.gov/oes/current/oesosci.htm>) and BLS May 2017 Occupation Profiles [mean hourly wage] (https://www.bls.gov/oes/2017/may/oes_stru.htm). Last modified March 30, 2018.
- (3) The base hourly wages & salaries (not including benefits & overhead) for administrative support is from BLS's Employer Costs for Employee Compensation (ECEC) (<http://www.bls.gov/news.release/ecec.t09.htm>) for December 2017 (All workers, goods-producing industries," "Sales and office"). Last modified March 20, 2018.
- (4) From BLS's ECEC (<https://www.bls.gov/web/ecec/eceqrtn.pdf>) for June of 2017, using the ratio of wages and benefits to calculate the loading factor. For Technical, Engineers, Technicians and Managerial roles, used "Management, professional, and related occupations" (Table 19). For Administrative Support, used "Office and administrative support occupations" (Table 19).
- (5) The overhead loading factor is from Rice, Cody 2002. "Wage Rates for Economic Analyses of the Toxics Release Inventory Program," Analytical Support Branch, Environmental Analysis Division, Office of Environmental Information, U.S. EPA, June 10, 2002.
- (6) The loaded hourly rate = Wages & Salaries + (Wages & Salaries * Benefits Loading Factor) + (Wages & Salaries * Overhead Loading Factor).

Appendix D-2. EPA Labor Rates

ICR Labor Category	Labor Rates for the 2019 Renewal ICR			
	OPM Designation	Wages & Salaries (2017\$) (1)	Benefits Loading Factor (2)	Loaded Hourly Rates Used in ICRs (2017\$)
Technical	GS-12, Step 5	\$34.54	0.600	\$55.26
Managerial	GS-13, Step 1	\$36.24	0.600	\$57.98
Clerical	GS-6, Step 3	\$16.49	0.600	\$26.38

(1) These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf.

(2) The rates have been increased by 60% to account for the benefit packages available to government employees.