

DRAFT CALCS

Source Labor Rate				
	2018 Hourly	Wage Rate	Benfits & Overhead	Total
	\$70.00	\$38.94	1.8	\$70.09
State/Local Agency Labor Rate - Applies only to Part 70.				
	2018 Hourly	Wage Rate	Benfits & Overhead	Total
	\$62.00	\$34.31	1.8	\$61.75
EPA Rates [1]				
	2018 Hourly	Wage Rate	Benefits	Total
	\$58.00	\$36.29	1.6	\$58.06

[1] This is "base rate." Per David Painter, use this rather than "locality payment" rates.

Federal Labor Cost obtained from U.S. Office of Personnel Management 2021 General Schedule Table 2021-GS.

Hourly labor rate assumed is GS-12, Step 5 (Technical Labor). 60% benefits assumed.

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf

STATE/LOCAL LABOR RATE	
\$33.78 = 25th percentile hourly wage for Environmental Engineers	
<u>Date of & Link to Wage Data</u>	
May 2020 http://www.bls.gov/oes/current/oes172081.htm	
<u>ECI Value</u>	<u>Date of & Link to ECI Data</u>
134.9	Mar 2020 http://www.bls.gov/web/eci/echistrynaics.pdf
137.0	Mar 2021 http://www.bls.gov/web/eci/echistrynaics.pdf
0.98 = Adjustment Factor	
\$34.31 = Escalated State Wages in \$/hr	

SOURCE LABOR RATE	
Environmental Engineers	
\$46.58 = Mean hourly wage for Environmental Engineers	
<u>Date of & Link to Wage Data</u>	
May 2020 http://www.bls.gov/oes/current/oes172081.htm	
<u>ECI Value</u>	<u>Date of & Link to ECI Data</u>
139.2	Mar 2020 http://www.bls.gov/web/eci/echistrynaics.pdf
143.2	Mar 2021 http://www.bls.gov/web/eci/echistrynaics.pdf
0.97 = Adjustment Factor	
\$45.28 = Escalated State Wages in \$/hr	
Environmental Engineer Technicians	
\$27.20 = Mean hourly wage for Environmental Engineering Technicians	
<u>Date of & Link to Wage Data</u>	
May 2020 http://www.bls.gov/oes/current/oes173025.htm	
<u>ECI Value</u>	<u>Dates of & Links to ECI Data</u>
139.2	Mar 2020 http://www.bls.gov/web/eci/echistrynaics.pdf
143.2	Mar 2021 http://www.bls.gov/web/eci/echistrynaics.pdf
0.97 = Adjustment Factor	
\$26.44 = Escalated State Wages in \$/hr	

Weighted Average Wage for Combination of Environmental Engineers and Technicians	
Technicians perform 50% of labor hrs for Operating gap-filling monitoring & Preparing monitoring/compliance reports.	
\$	3,822,980.00 = Technician labor hours for ICR period
Engineers perform all source labor hours - the hours performed by technicians.	
\$	7,538,270.00 = Engineer labor hours for ICR period
\$38.94 = Weighted Avg Wage for Combination of Env. Engineers and Techs	

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Starting Permits		Notes
# of issued permits (all types) =	13,988	TOPS Data that has been adjusted

Permit Backlog			
		# of Permits	Notes
Start of yr 1	December 31, 2017	213	TOPS Data = 213 (Outstanding Initial Part 70 Applications)
End of Yr 1	December 31, 2018	71	Divide the number @ start of ICR by 3 & spread it across the 3 yr life of ICR.
End of Yr 2	December 31, 2019	71	
End of Yr 3	December 31, 2020	71	

SOURCE POPULATION

Existing and Projected Part 70 Sources (Permitted + Backlog + New Sources)			
		# of Sources	Notes
Start of ICR	December 31, 2017	14,201	Automatic Calc Cell = Issued permits + BACKLOG
End of Yr 1	December 31, 2018	100	Assume 100 added each year. (new)
End of Yr 2	December 31, 2019	100	Assume 100 added each year. (new)
End of Yr 3	December 31, 2020	100	Assume 100 added each year. (new)

Renewal Backlog			
		# of Permits	Notes
		2,200	Tops Data (oustanding renewal permits + expired permits)

Permitting Authorities			
		# of PAs	Notes
		117	

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Table 1. Average Source Burden by Activity

ACTIVITY	Hours per permit/program	Previous ICR	Summary of changes during 2021 ICR Renewal
		2018 Hrs per permit	
Initial Permit Application	330	330	No change
Draft Permit Interaction	50	50	No change
Gap Filling Monitoring Development	44	44	No change
Public Hearing Participation	11	11	No change
Operate Gap Filling Monitoring	200	200	No change
Prep Monitoring/Compliance Reports & Compliance Certifications	80	80	No change
Significant Permit Revisions (11% of permits)	84	84	No change
Minor Permit Revisions (35% of permits)	44	44	No change
Administrative Amendments (50% of permits)	8	8	No change
General Permit	2	2	No change
Permit Renewal Application	216	216	No change
Other Permit Renewal Activities	22	22	No change

Table 2. Average Permitting Authority Burden by Activity

ACTIVITY	Hours per permit/program	Previous ICR	Summary of changes during 2021 ICR Renewal
		2018 Hrs per permit	
Program Administration	3,500	3,500	No change
Permit Application Review	110	110	No change
Draft Permit Preparation	170	170	No change
Comment Period Notification	11	11	No change
Public Hearing (2% of permits)	110	110	No change
Interaction with EPA	20	20	No change
Analyze Public Comments (2% of permits)	44	44	No change
Permit Issuance	9	9	No change
General Permit Administration	80	80	No change
Significant Permit Revisions (11% of permits)	94	94	No change
Minor Permit Revisions (35% of permits)	34	34	No change
Administrative Amendments (50% of permits)	5	5	No change
Renewals Single Source Permits	97	97	No change
Renewals General Permits	10	10	No change
Review Monitoring/Compliance Reports	15	15	No change
Annual Enforcement Activity	40	40	No change

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Types of Existing and Projected Permitted Sources*		
		Total Polulation
Start of Yr 1:	December 31, 2017	14,201
End of Yr 1:	December 31, 2018	100
End of Yr 2:	December 31, 2019	100
End of Yr 3:	December 31, 2020	100
Total Permitted Sources =		14,501

* Does not include permits in backlog because we do not have information on the type of sources at this time.

RENEWALS						
Renewal backlog =	2,200	Newly Expired	Backlog Reduced	Renewal Issd	Single Permit	General Permit
	Renewals YR 1	2,798	733	3,531	2,966	565
	Renewals YR 2	2,798	733	3,531	2,966	565
	Renewals YR 3	2,799	733	3,532	2,967	565
Total Renewals (End of ICR) =		8,395	2,200	10,595	8,899	1,696

MODIFICATIONS				
	Issued single	SIGNIFICANT MODIFICATIONS	MINOR MODIFICATIONS	ADMIN. AMENDMENTS
		Baseline % 10%	Baseline % 50%	Baseline % 50%
revisions Yr-1	13,988	1,399	6,994	6,994
revisions Yr-2	14,159	1,416	7,080	7,080
revisions yr-3	14,330	1,433	7,165	7,165
Totals =	42,477	4,248	21,239	21,239

* Significant mods and minor mods have been adjusted for FAP and the Tailoring Rule as explained in attachment.

Table 5. Identification of Affected Entities and Permit Issuance Schedule

Interval	Source Population	New Sources	Permitting Backlog	Additional Permits Issued	Total Permits Issued
Start of Yr 1:	14,201	0	213	0	13,988
End of Yr 1:	14,301	100	71	171	14,159
End of Yr 2:	14,401	100	71	171	14,330
End of Yr 3:	14,501	100	71	171	14,501
3 YR totals =		300		513	

Population = total # subject to permitting. Backlog = unissued permits. Additional issued = New sources + some of backlog.

Table 6. Burden and Cost of Source Activities

Sources Hourly Labor Rate = \$70.00				
Activity	Burden per Permit (Hours)	Number of Affected Permits over 3 Year ICR	Total 3-Year Burden (Hours)	Total 3-Year Cost (2018 \$)
Initial Permit Application	330	300	99,000	\$6,930,000
Draft Permit Interaction	50	513	25,650	\$1,795,500
Gap Filling Monitoring Development	44	257	11,308	\$791,560
Public Hearing Participation	11	10	110	\$7,700
Operate Gap Filling Monitoring	200	Yr 1: 6,994	1,398,800	\$97,916,000
		Yr 2: 7,080	1,416,000	\$99,120,000
		Yr 3: 7,165	1,433,000	\$100,310,000
Prep Monitoring/Compliance Reports & Compliance Certifications	80	Yr 1: 13,988	1,119,040	\$78,332,800
		Yr 2: 14,159	1,132,720	\$79,290,400
		Yr 3: 14,330	1,146,400	\$80,248,000
Revisions/Modifications:				
Significant Permit Revisions (11% of permits)	84	Yr 1: 1,399	117,516	\$8,226,120
		Yr 2: 1,416	118,944	\$8,326,080
		Yr 3: 1,433	120,372	\$8,426,040
Minor Permit Revisions (35% of permits)	44	Yr 1: 6,994	307,736	\$21,541,520
		Yr 2: 7,080	311,520	\$21,806,400
		Yr 3: 7,165	315,260	\$22,068,200
Administrative Amendments (50% of permits)	8	Yr 1: 6,994	55,952	\$3,916,640
		Yr 2: 7,080	56,640	\$3,964,800
		Yr 3: 7,165	57,320	\$4,012,400
Revision Subtotals =			1,461,260	\$102,288,200
General Permit	2	1,696	3,392	\$237,440
Permit Renewal Application	216	8,899	1,922,184	\$134,552,880
Other Permit Renewal Activities	22	8,899	195,778	\$13,704,460
Total Burden and Cost for All Sources Over 3 Yrs =			11,361,250	\$795,287,500
Average Annual Burden and Cost =			3,787,083	\$265,095,833

Table 7. Burden and Cost of Permitting Authority Activities

PA Hourly Labor Rate = \$62.00				
Activity	Burden per Permit (Hours)	Number of Affected Permits/PAs over 3 Year ICR	Total 3-Year Burden (Hours)	Total 3-Year Cost (2018 \$)
Program Administration	3,500	1	10,500	\$651,000
Permit Application Review	110	300	33,000	\$2,046,000
Draft Permit Preparation	170	513	87,210	\$5,407,020
Comment Period Notification	11	513	5,643	\$349,866
Public Hearing (2% of permits)	110	10	1,100	\$68,200
Interaction with EPA	20	513	10,260	\$636,120
Analyze Public Comments (2% of permits)	44	10	440	\$27,280
Permit Issuance	9	513	4,617	\$286,254
General Permit Administration	80	117	9,360	\$580,320
Significant Permit Revisions (11% of permits)	94	4,248	399,312	\$24,757,344
Minor Permit Revisions (35% of permits)	34	21,239	722,126	\$44,771,812
Administrative Amendments (50% of permits)	5	21,239	106,195	\$6,584,090
Revision Subtotals =			1,227,633	\$76,113,246
Renewals Single Source Permits	97	8,899	863,203	\$53,518,586
Renewals General Permits	10	1,696	16,960	\$1,051,520
Review Monitoring/Compliance Reports	15	Yr 1: 13,988	209,820	\$13,008,840
		Yr 2: 14,159	212,385	\$13,167,870
		Yr 3: 14,330	214,950	\$13,326,900
Annual Enforcement Activity	40	117	4,680	\$290,160
Total Burden and Cost for All Permit Authorities Over 3 Yrs =			2,907,081	\$180,239,022

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Table 8. Bottom Line Average Annual Respondent Burden (Hours)

Respondent	Number of Affected Entities	Average Annual Burden (hours)	Average Annual Burden per Respondent (hours)	Average Annual Burden per Source (hours)
Sources	14,501	3,787,083	261	261
Permitting Authorities	117	969,027	8,282	67
Totals =	14,618	4,756,110	NA	NA

Table 9. Bottom Line Average Annual Respondent Cost (2018\$)

Respondent	Number of Affected Entities	Average Annual Cost (2021\$)	Average Annual Cost per Respondent (2021\$)	Average Annual Cost per Source (2021\$)
Sources	14,501	\$265,095,833	\$18,281	\$18,281
Permitting Authorities	117	\$60,079,674	\$513,501	\$4,143
Totals =	14,618	\$325,175,507	NA	NA

Table 10. Bottom Line Average Annual EPA Burden and Cost

Number of Sources	EPA Burden		EPA Cost	
	Annual EPA Burden (hours)	Average Annual Burden per Source (hours)	Average Annual EPA Cost (2021\$)	Average Annual Cost per Source (2021\$)
14,501	44,668	3	\$2,590,721	\$179

Table 11. Burden Change from 2018 ICR to Current ICR (hours)

Type of Respondent	Average Annual Burden in 2018 ICR (hours)	Average Annual Burden in ICR Renewal (hours)	Difference (hours)	% Change (hours)
Sources	3,786,856	3,787,083	227	0%
Permitting Authorities	952,068	969,027	16,959	2%
Total =	4,738,924	4,756,110	17,186	NA

Table 12. Burden Statement (hours)

Type of Respondent	Number of Respondents	Total Annual Burden (Hours)	Annual Burden per Respondent (Hours)	Annual Burden per Source* (Hours)
Sources	14,501	3,787,083	261	261
Permitting Authorities	117	969,027	8,282	67