

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

Information Collection Activity	EIS	
	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 incl

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

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

operations and maintenance)

Total Cost/ Year	CAERS Case 3			CAERS Case 4	
	No. of SLTs	Total Hours/ Year	Total Cost/ Year	No. of SLTs	Total Hours/ Year
\$271,682	2	80	\$7,302	10	152
\$397,459	2	103	\$9,733	10	256
\$3,284,946					
\$3,954,088		183	\$17,035		408
\$0	0	0	\$0	5	1,613
\$549,416	2	46	\$4,259	10	102
\$549,416		46	\$4,259		1,715

cluded 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

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

\$15,130,399

Cost 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, 2022, GS13, st

\$300,000 EIS and CAERS captial costs (w

\$1,300,000 EIS Contractor

\$325,000 CAERS Contractor

\$800,000 NEI Contractor costs

\$2,539,800 Total FTE Costs

\$2,425,000 Total D&O&M costs

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

Table 14: Burden Change

SLTs
Annual Responses
Annual Respondent Hour Burden
Annual Respondent Cost Burden
Owners/Operators
Annual Responses
Annual Respondent Hour Burden
Annual Respondent Cost Burden
EPA
All EPA Costs

Step 7, with 26% overhead
(working capital)

Currently Approved ICR	Change	Total Requested
85	-17	68
48,702	+4,780	53,482
\$4,960,908	\$14,893,130	\$19,854,038
0	+5,807	5,807
0	+145,077	145,077
\$0	\$16,578,243	\$16,578,243
\$5,589,000	-\$221,200	\$5,367,800

Estimated number of agencies reporting

Agency Type	Triennial Point reporting agencies	2020 Point	2023 Point	2020 Nonpoint
State	52	52	52	23
Local	9	9	9	5
Tribal (voluntary)	5	5	2	5
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, portable fuel
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	Reference

Coeur d'Alene Tribe	P,NP,OR, NR	P,NP,OR, NR
Kootenai Tribe of Idaho	NP,OR,NR	NP,OR,NR
Nez Perce Tribe	P,NP,OR, NR	P,NP,OR, NR
Northern Cheyenne Tribe	P, NP,OR,NR	P,NP,OR, NR
Salt River Pima Maricopa In		P,NP
Shoshone-Bannock Tribes of	P,NP,OR, NR	P,NP,OR, NR
Southern Ute Indian Tribe	P,NP	P,NP
Ute Mountain Tribe of the Ut		P
Yakama Nation Reservation		P

ID 2

ID 1

ID 4 <http://idsmo>

MT 2 <https://comn>

AZ 1 <https://comn>

ID 4 See link abov

CO 2 <https://en.wi>

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

Table 2: State respondent voluntary bu

2023 Nonpoint (as
of 5/28/25)

17

Activity

4

CAERS Case 3 and 4

2

1. Update and deliver training to owners/operators about new reporting approach

2. Curate list of facilities to remove duplicates

3. Other coordination activities including ensuring any CAERS customizations meet SLT requirements.

CAERS Case 3

4. Modify SLT system to receive data from CAERS user interface.

SubTotal Case 3

SubTotal - Case 4

Table 3: Annualized one-time burden p

Activity

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

I containers, stage II gasoline (via MOVES)

[https://commons.wikimedia.org/wiki/File:2490R_Northern_Cheyenne_Indian_Reservation Locator Ma](https://commons.wikimedia.org/wiki/File:2490R_Northern_Cheyenne_Indian_Reservation Locator Map)
https://commons.wikimedia.org/wiki/File:Maricopa_County_Incorporated_and_Planning_areas_SRPMap
/e for ID

https://en.wikipedia.org/wiki/Southern_Ute_Indian_Reservation#/media/File:3925R_Southern_Ute_Reservation

den for one-time point source activities when using CAERS

Hours Per Respondent			
Engineering Managerial Hours	Scientist Technical Hours	IT Admin Hours	Total
24	240		264
16	160		176
48	480		528
104		1,040	1,144
192	880	1,040	2,112
88	880		968

er State respondent

Manager Hrs/Yr @	Scientist Hrs/Yr @	IT Hrs/Yr @	Hours/Yr	Labor Cost/Year
\$168.10	\$84.60	\$96.68		

64	293	347	704	\$69,089
29	293	0	323	\$29,747

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[C_highlighted.svg

ervation_Locator_Map.svg

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

Table 4: State point source reporting burden hours by activity

Activity	Hours Per Respondent		
	Engineering Managerial Hours	Scientist Technical Hours	Total
Point sources - Annual (required and voluntary)			
1. Quality assurance of submitted data and revision support	2	24	26
2. Extract data from the state data system		4	4
3. Convert data into the XML format – facility attributes information		8	8
4. Convert data into the XML format – annual emissions information		4	4
5. Run EIS quality-assurance checks and resolve critical errors	2	24	26
6. Submit final file to the EPA via CDX		2	2
7. Respond to follow-up inquiries from the EPA	2	4	6
Subtotal Annual Point Source Reporting via EIS	6	70	76
Subtotal Annual Point Source Reporting via CAERS Case 3	4	46	50
Subtotal Annual Point Source Reporting via CAERS, Case 4	3	16	19
Point sources - Triennial CAPs (required and voluntary), additional hours			

1. Quality assurance of submitted data and revision support	12	120	132
2. Extract data from the state data system	0	4	4
3. Convert data into the XML format – facility attributes information	0	16	16
4. Convert data into the XML format – annual emissions information	0	8	8
5. Run EIS quality-assurance checks and resolve critical errors	12	120	132
6. Submit final file to the EPA	1	2	3
7. Respond to follow-up inquiries from the EPA	10	20	30
Subtotal Triennial Point Source Reporting Increment via EIS – all point sources via EIS	35	290	325
Subtotal Triennial Point Sources Reporting Increment via CAERS Case 3	23	170	193
Subtotal Triennial Point Source Reporting Increment via CAERS Case 4	16	80	96

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

CAERS Cases	CY 2026	CY 2027	CY 2028
Cases 1 and 2 (0%)	0	0	0
Case 3 (50%)	2	2	2
Case 4 (50%)	7	10	12

Total	9	12	14
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Not using CAERS 59 56 54

Not using CAERS or CAERS Case 1 or 2 59 56 54

Using CAERS Case 3 or 4 9 12 14

Inventory years: 2025 2026 2027

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

	Hours Per Respondent		Hours Per R
	CAPs		Volunta
Hours Calculations	Engineerin g Managerial Hours/yr	Scientist Technical Hours/Yr	Engineerin g Managerial Hours/Yr
2025 and 2027 emissions reporting without CAERS	4.20	49	1.80
2025 and 2027 emissions reporting with CAERS, Case 3	3.20	36.80	0.80
2025 and 2027 emissions reporting with CAERS, Case 4	2.40	12.80	0.60
2026 emissions reporting, 3-year average triennial increment without CAERS	8.17	67.67	3.50

2026 emissions reporting, 3-year average, triennial increment with CAERS, case 3	6.13	45.33	1.53
2026 emissions reporting, 3-year average, triennial increment with CAERS, case 4	4.27	21.33	1.07

ed Locals, for example)

Applies to CAERS Cases?
3 @ 100%, 4 @ 50%
3
3
3
3, 4
3, 4
Hours Reduction
34%
75%

3 @ 100%, 4 @ 50%
3
3
3
3, 4
3, 4
Hours Reduction
41%
70%

Average
0
2
10

12

56

56

12

hours for different cases

Respondent	% Effort HAP
Primary HAPs	
Scientist	
Technical	
Hours/Yr	
21	30%
9.20	20%
3.20	20%
29	30%

11.33	20%
5.33	20%

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

Activity	State count	Hour: 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 documentation 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 subr

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	Hour
		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 documentation 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

ices burden hours by activity

s Per Respondent	
Scientist Technical Hours	Total
1,679	1,763
240	252
54	57
40	42
16	17
80	84
120	126
180	189
1,915	2,011
280	294

State/Local	
Engineering Managerial Hours	Engineering Technical Hours
79	1,579
11	223
3	54
2	42
1	20
4	80
5	108
Max State count + Local/Tribal	Engineering Managerial Hours
20	12.05

40	42
160	168
10	11
357	375

missions (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
			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

en 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

I 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 emissio 10

No. states/locals submitting O&G inputs 6

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

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
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\$168.10 \$84.60

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

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

EIS 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

Table 10: SLT data system operation and mair

Activity
1. Collection system operation & maintenance (O&M)
2. Update collection system with new codes, emission factors, and other new information for reporting year
3. User support and training for point source emissions data reporting
Subtotal for System O&M EIS and CAERS Case 1 & 2
Subtotal for System O&M with CAERS Case 3
Subtotal for System O&M with CAERS Case 4

Table 11: Agency average burden of data syst

Point source data collection system operations and maintenance for...
EIS reporting

109	\$9,811
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CAERS Case 3
CAERS Case 4
Total and Weighted Average

ission for CAERS Cases 3 and 4 Approach

Cost Change/ Year
-\$1,200
-\$2,231
-\$2,992
-\$6,423
-\$3,365
-\$4,575
-\$4,119
-\$12,059

Maintenance hours for NEI collection from owners/operators

Hours Per Respondent				Applies to CAERS Cases?
Engineering Managerial Hours	Scientist Technical Hours	IT Admin Hours	Total	
112	80	1,040	1,232	Case 3 @ 80%
12	40	80	132	Case 3 @ 80%
110	1,052	40	1,202	Case 3 @ 50%, case 4 @ 50%
234	1,172	1,160	2,566	Hours Reduction
154	622	916	1,692	34%
55	526	20	601	77%

\$ 168.10 \$ 84.60 \$ 96.68

Operation and maintenance costs for NEI collection from owners/operators

State, local, or tribal count	Manager Hrs/yr @ \$168.10/Hr	Scientist Hrs/yr @ \$84.60/Hr	IT Hrs/yr @ \$96.68/Hr	Total Hours/Year	Cost/Year
56	234	1,172	1,160	2,566	\$250,632

2	154	622	916	1,692	\$167,098
10	55	526	20	601	\$55,679
68	205.3	1060.8	985.2	2251.3	\$219,506

ors

Inventory years: 2027 2026

Estimated Reporting Entities CY 2028 CY 2027

Estimated Reporting Entities	CY 2028	CY 2027
No. Requ'd HAP/CAP Major	1,654	7,737
No. Requ'd CAP Major	856	4,643
No. Required HAP Major	0	0
No. Total Required Major	2,510	12,379
No. Voluntary HAP Major	546	1,041
No. Voluntary HAP/CAP Major	3,011	0
No. Voluntary CAP Major	1,557	0
No. Voluntary Non-Major	13,548	64,066
No. Voluntary HAP facilities from SLT	15,213	55,677
No. Voluntary total	18,662	65,107
No. HAP or HAP/CAP Major	2,200	8,777
No. CAP or HAP/CAP Major	7,078	12,379
No. Total Major	7,624	13,420
Total Submitted by SLTs	21,172	77,486
Total w/ HAP submitted By SLTs	15,213	55,677
No. Facilities reporting to EIS and TRI	4,931	7,330

2025

This ICR

Raw Data for Calculating Esti

CY 2026 **Average per**
 Year **Notes**

1,654	3,682		Nc
856	2,118		N
0	0		Nc
2,510	5,800		No.
546	711		
3,011	2,007		
1,557	1,038		
13,548	30,387		
15,213	28,701		
18,662	34,144		
2,200	4,393		
7,078	8,845		
7,624	9,556		
21,172	39,943		
15,213	28,701		
4,931	5,731		

Estimated Number of Major Sources for Burden

	Facilities from 2017 RAS* or 2020 RAS (see comments)	Facilities from 2018 RAS*
o. HAP Major ID'd	840	546
lo. HAP/CAP ID's	6,244	4,665
o. CAP Major ID'd	3,747	2,413
. Total Major ID'd	10,831	7,624
Total Submitted	77,486	21,172

* RAS = Responsible Agency Selection, which represents only what the states have reported directly. Note: the older inventory years used here would tend to overestimate the number of sources, since the number of sources above the thresholds goes down over time.

ectly to the EPA
since the numbers

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 addressed the comm

Employee	Employer
Environmental Engineer	State Government

Architectural and Engineering Managers
Network and Computer Systems Administrator

State Government
State Government

Mean Hourly Wage*	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm)
\$53.16	\$111.64	https://www.bls.gov/oes/special-requests/oesm24nat.zip
\$84.48	\$177.41	https://www.bls.gov/oes/special-requests/oesm24nat.zip

Weighted Hourly Wage	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm) + Calculations included in this spreadsheet based on table at the right
\$51.70	\$108.57	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$40.29	\$84.60	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$80.05	\$168.10	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$46.04	\$96.68	https://www.bls.gov/oes/special-requests/oesm24st.zip

Weighted Hourly Wage	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm) + Calculations included in this spreadsheet based on table at the right
\$50.37	\$105.77	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$39.52	\$82.99	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$78.08	\$163.98	https://www.bls.gov/oes/special-requests/oesm24st.zip
\$45.14	\$94.80	https://www.bls.gov/oes/special-requests/oesm24st.zip

ent about region-specific labor rates.

Mean Hourly Wage*	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm)
\$45.97	\$96.54	https://www.bls.gov/oes/special-requests/oesm24in4.zip

\$70.38	\$147.80	https://www.bls.gov/oes/special-requests/oesm24in4.zip
\$43.38	\$91.10	https://www.bls.gov/oes/special-requests/oesm24in4.zip

Postal State Code	FIPS State Code	No. Counties	No. Triennial Expected Facilities
AL	01	67	227
AK	02	30	100
AZ	04	15	62
AR	05	75	121
CA	06	58	256
CO	08	64	150
CT	09	9	32
DE	10	3	10
DC	11	1	5
FL	12	67	238
GA	13	159	213
HI	15	5	20
ID	16	44	37
IL	17	102	299
IN	18	92	282
IA	19	99	180
KS	20	105	154
KY	21	120	193
LA	22	64	331
ME	23	16	40
MD	24	24	44
MA	25	14	53
MI	26	83	241
MN	27	87	190
MS	28	82	162
MO	29	115	129
MT	30	56	42
NE	31	93	74
NV	32	17	36
NH	33	10	13
NJ	34	21	72

NM	35	33	112
NY	36	62	203
NC	37	100	208
ND	38	53	42
OH	39	88	243
OK	40	77	215
OR	41	36	96
PA	42	67	260
RI	44	5	14
SC	45	46	160
SD	46	66	32
TN	47	95	150
TX	48	254	635
UT	49	29	47
VT	50	14	6
VA	51	133	164
WA	53	39	81
WV	54	55	99
WI	55	72	220
WY	56	23	92
GU	66	1	
PR	72	78	19
VI	78	3	
		3,226	7,104

--> Hourly wage and benefits from State_M2024_dl_Modified 08-08-2024.xlsx

Architectural and Engineering Managers	Environmental Engineers	Environmental Scientists and Specialists, Including Health	Network and Computer Systems Administrators
\$77.37	\$49.89	\$36.64	\$41.72
\$77.70	\$55.52	\$46.30	\$45.34
\$94.92	\$45.45	\$42.90	\$45.57
\$67.69	\$44.08	\$41.90	\$40.23
\$98.85	\$61.41	\$51.64	\$55.05
\$91.47	\$49.47	\$44.81	\$51.11
\$84.32	\$56.10	\$46.06	\$51.60
\$83.85	\$54.58	\$31.62	\$46.74
\$85.77	\$58.72	\$61.23	\$57.17
\$81.64	\$45.60	\$32.70	\$46.19
\$76.62	\$48.84	\$47.61	\$47.03
\$69.88	\$56.03	\$37.59	\$49.00
\$76.91	\$47.21	\$34.95	\$46.83
\$77.66	\$59.45	\$46.96	\$47.68
\$72.84	\$54.34	\$40.06	\$41.73
\$70.01	\$47.90	\$38.00	\$41.91
\$76.89	\$48.63	\$40.23	\$41.78
\$68.78	\$52.76	\$33.15	\$41.41
\$83.14	\$59.54	\$38.01	\$45.50
\$72.10	\$43.99	\$32.35	\$39.28
\$81.66	\$50.79	\$43.44	\$58.66
\$93.29	\$57.15	\$47.76	\$52.89
\$77.34	\$49.64	\$39.26	\$46.05
\$83.52	\$50.95	\$42.73	\$47.40
\$65.01	\$40.63	\$32.16	\$37.08
\$74.83	\$42.01	\$33.89	\$43.25
\$67.07	\$48.75	\$38.77	\$38.06
\$67.89	\$46.06	\$32.36	\$43.41
\$75.95	\$56.84	\$42.25	\$48.93
\$85.43	\$44.07	\$40.93	\$46.76
\$90.36	\$54.12	\$41.08	\$51.42

\$100.83	\$57.94	\$41.80	\$44.58
\$89.19	\$50.73	\$42.83	\$53.58
\$80.27	\$51.87	\$35.89	\$47.91
\$70.90	\$54.04	\$38.11	\$40.38
\$78.02	\$49.09	\$40.32	\$46.54
\$80.12	\$46.61	\$36.72	\$44.97
\$83.58	\$62.92	\$46.15	\$49.11
\$75.36	\$48.20	\$38.35	\$45.40
\$86.40	\$51.95	\$45.90	\$51.28
\$79.16	\$48.67	\$38.67	\$45.06
\$76.87	\$43.89	\$35.30	\$35.81
\$75.06	\$46.88	\$42.08	\$50.36
\$88.67	\$57.05	\$42.42	\$47.20
\$75.46	\$49.37	\$40.93	\$47.83
\$78.24	\$43.85	\$34.77	\$42.28
\$84.59	\$55.08	\$41.78	\$54.80
\$93.82	\$58.05	\$45.65	\$53.26
\$73.48	\$49.31	\$38.59	\$39.07
\$71.33	\$48.05	\$36.60	\$43.35
\$71.83	\$50.24	\$37.25	\$38.27
\$49.65		\$32.98	
\$59.22	\$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	Network and Computer Systems Administrators
\$17,562.99	\$11,325.03	\$8,317.28	\$9,470.44
\$7,770.00	\$5,552.00	\$4,630.00	\$4,534.00
\$5,885.04	\$2,817.90	\$2,659.80	\$2,825.34
\$8,190.49	\$5,333.68	\$5,069.90	\$4,867.83
\$25,305.60	\$15,720.96	\$13,219.84	\$14,092.80
\$13,720.50	\$7,420.50	\$6,721.50	\$7,666.50
\$2,698.24	\$1,795.20	\$1,473.92	\$1,651.20
\$838.50	\$545.80	\$316.20	\$467.40
\$428.85	\$293.60	\$306.15	\$285.85
\$19,430.32	\$10,852.80	\$7,782.60	\$10,993.22
\$16,320.06	\$10,402.92	\$10,140.93	\$10,017.39
\$1,397.60	\$1,120.60	\$751.80	\$980.00
\$2,845.67	\$1,746.77	\$1,293.15	\$1,732.71
\$23,220.34	\$17,775.55	\$14,041.04	\$14,256.32
\$20,540.88	\$15,323.88	\$11,296.92	\$11,767.86
\$12,601.80	\$8,622.00	\$6,840.00	\$7,543.80
\$11,841.06	\$7,489.02	\$6,195.42	\$6,434.12
\$13,274.54	\$10,182.68	\$6,397.95	\$7,992.13
\$27,519.34	\$19,707.74	\$12,581.31	\$15,060.50
\$2,884.00	\$1,759.60	\$1,294.00	\$1,571.20
\$3,593.04	\$2,234.76	\$1,911.36	\$2,581.04
\$4,944.37	\$3,028.95	\$2,531.28	\$2,803.17
\$18,638.94	\$11,963.24	\$9,461.66	\$11,098.05
\$15,868.80	\$9,680.50	\$8,118.70	\$9,006.00
\$10,531.62	\$6,582.06	\$5,209.92	\$6,006.96
\$9,653.07	\$5,419.29	\$4,371.81	\$5,579.25
\$2,816.94	\$2,047.50	\$1,628.34	\$1,598.52
\$5,023.86	\$3,408.44	\$2,394.64	\$3,212.34
\$2,734.20	\$2,046.24	\$1,521.00	\$1,761.48
\$1,110.59	\$572.91	\$532.09	\$607.88
\$6,505.92	\$3,896.64	\$2,957.76	\$3,702.24

\$11,292.96	\$6,489.28	\$4,681.60	\$4,992.96
\$18,105.57	\$10,298.19	\$8,694.49	\$10,876.74
\$16,696.16	\$10,788.96	\$7,465.12	\$9,965.28
\$2,977.80	\$2,269.68	\$1,600.62	\$1,695.96
\$18,958.86	\$11,928.87	\$9,797.76	\$11,309.22
\$17,225.80	\$10,021.15	\$7,894.80	\$9,668.55
\$8,023.68	\$6,040.32	\$4,430.40	\$4,714.56
\$19,593.60	\$12,532.00	\$9,971.00	\$11,804.00
\$1,209.60	\$727.30	\$642.60	\$717.92
\$12,665.60	\$7,787.20	\$6,187.20	\$7,209.60
\$2,459.84	\$1,404.48	\$1,129.60	\$1,145.92
\$11,259.00	\$7,032.00	\$6,312.00	\$7,554.00
\$56,305.45	\$36,226.75	\$26,936.70	\$29,972.00
\$3,546.62	\$2,320.39	\$1,923.71	\$2,248.01
\$469.44	\$263.10	\$208.62	\$253.68
\$13,872.76	\$9,033.12	\$6,851.92	\$8,987.20
\$7,599.42	\$4,702.05	\$3,697.65	\$4,314.06
\$7,274.52	\$4,881.69	\$3,820.41	\$3,867.93
\$15,692.60	\$10,571.00	\$8,052.00	\$9,537.00
\$6,608.36	\$4,622.08	\$3,427.00	\$3,520.84
\$1,125.18	\$680.58	\$499.70	\$518.89
\$80.05	\$51.70	\$40.29	\$46.04

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

Activity	Facility Count for 1 Year	Ave. Facility Count Over 3 Years
Required activities		
1. Report annual CAPs by facility to states for use in triennial (2026) AERR report	12,379	5,800
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	5,800
Voluntary activities for triennial inventory years		
3. Provide rail yard data to the EPA for 2026 (in 2027)	7	

\$177.41

\$111.64

Hours per Facility in 1 year			Total Cost/Year
Manager Hrs/yr @ \$177.41/Hr	Engineer Hrs/yr @ \$111.64/Hr	Total Hrs/Yr	
1	24	25	\$2,857
1	24	25	\$2,857
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.

Total 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