

Appendix D: Updated Fees

This attachment describes the updates to the fee amounts in the proposed amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate (TRU ATCM; title 13, California Code of Regulations, section 2477) as a result of the 15-day changes described in the Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information.

1. Labor Costs

a. Direct Labor

Staff did not make any updates to the direct labor cost.

b. Indirect Labor

In the Initial Statement of Reasons (ISOR), the indirect labor cost was included as an additional 26 percent of the direct labor cost. Staff removed the additional 26 percent indirect labor cost because the salary amounts used for the direct labor cost already included operating expenses and equipment for each labor classification.

c. Total Labor Cost

Table 1 shows the updated total annual labor cost for the TRU program.

Table 1. Total Annual TRU Program Labor Cost

Annual Direct Labor Cost	Annual Indirect Labor Cost	Total Annual Labor Cost
\$3,153,750	\$0	\$3,153,750

2. Operational Costs

Operational costs are the direct costs to conduct program activity. As shown in Table 2, this includes compliance label, envelope, and postage costs. Staff updated the estimated operational costs to account for the updated new sales populations and current postage costs. In the ISOR, staff used a postage rate of \$0.62 per envelope. Staff updated the amount to \$1.20 per envelope based on current postage rates.

Table 2. TRU Program Operational Costs

Item	Quantity Purchased Per Year	Estimated Cost Per Item	Operational Cost
Compliance Label (two per TRU)	159,614	\$2.50	\$399,034
Envelope	79,807	\$0.07	\$5,586
Postage	79,807	\$1.20	\$95,768
Total	n/a	n/a	\$500,388

3. Fee Calculation

The methodology used to calculate the fee amounts is the same as described in the ISOR. Table 3 shows the average annual number of TRUs and applicable facilities subject to fees as a result of the updated new sales populations (described in Attachment B), as well as the cost per TRU or applicable facility and zero-emission TRU, respectively. For reference, Table 4 shows the cost per TRU or applicable facility and zero-emission TRU as originally proposed in the ISOR.

Table 3. Updated Cost per TRU or Applicable Facility (to be Collected Every 3 Years)

Total Annual Average TRU Program Cost	Average Annual Number of TRUs/ Applicable Facilities Subject to Fees	Average Annual Number of Zero-Emission TRUs Subject to Fees	Cost per TRU/ Applicable Facility (every 3 years)	Cost per Zero-Emission TRU (every 3 years)
\$3,654,138	80,231	1,997	\$45	\$23

Table 4. Cost per TRU or Applicable Facility (to be Collected Every 3 Years) as Proposed in the ISOR

Total Annual Average TRU Program Cost	Average Annual Number of TRUs/ Applicable Facilities Subject to Fees	Average Annual Number of Zero-Emission TRUs Subject to Fees	Cost per TRU/ Applicable Facility (every 3 years)	Cost per Zero-Emission TRU (every 3 years)
\$4,433,160	81,201	1,965	\$54	\$27