

EPA ICR No. 1365.08; OMB Control No. 2070-0091

Attachment E

Worksheet A-1: Annual Recordkeeping Burden, by School Type and Asbestos Type

Worksheet A-2: Annual Recordkeeping Cost, by School Type and Asbestos Type

Worksheet A-1. Annual Recordkeeping Burden, by School Type and Asbestos Type¹

Year	ACM Type	Previous Year Removals	School Counts	Public Primary		Public Secondary		Private		Total Hours	Annual Total Hours
				No. of Schools	Hours/School	No. of Schools	Hours/School	No. of Schools	Hours/School		
17	SM & TSI	323	10,786	5,151	35	3,036	58	2,598	35	447,303	
	TSI	101	3,392	1,620	35	955	58	817	35	140,685	
	NFACM	424	106,319	59,412	15	23,099	28	23,808	15	1,895,522	2,483,510
18	SM & TSI	323	10,464	4,997	35	2,946	58	2,520	35	433,963	
	TSI	101	3,290	1,571	35	926	58	792	35	136,413	
	NFACM	424	106,744	59,615	15	23,218	28	23,911	15	1,902,994	2,473,370
19	SM & TSI	323	10,141	4,843	35	2,855	58	2,442	35	420,565	
	TSI	101	3,189	1,523	35	898	58	768	35	132,269	
	NFACM	424	107,167	59,817	15	23,337	28	24,013	15	1,910,886	2,463,720
20	SM & TSI	323	9,819	4,689	35	2,764	58	2,365	35	407,202	
	TSI	101	3,087	1,474	35	869	58	744	35	128,032	
	NFACM	424	112,094	61,344	15	24,586	28	26,164	15	2,001,028	2,536,262
21	SM & TSI	323	9,496	4,535	35	2,673	58	2,287	35	393,804	
	TSI	101	2,986	1,426	35	841	58	719	35	123,853	
	NFACM	424	112,518	61,546	15	24,705	28	26,267	15	2,008,935	2,526,592
22	SM & TSI	1,055	8,441	4,031	35	2,376	58	2,033	35	350,048	
	TSI	332	2,654	1,268	35	747	58	639	35	110,071	
	NFACM	1,387	113,905	62,208	15	25,096	28	26,601	15	2,034,823	2,494,942
23	SM & TSI	1,055	7,386	3,527	35	2,079	58	1,779	35	306,292	
	TSI	332	2,322	1,109	35	654	58	559	35	96,312	
	NFACM	1,387			15		28		15		
24	SM & TSI	1,055	6,331	3,023	35	1,782	58	1,525	35	262,536	
	TSI	332	1,991	951	35	560	58	479	35	82,530	
	NFACM	1,387			15		28		15		
25	SM & TSI	1,055	5,276	2,519	35	1,485	58	1,271	35	218,780	
	TSI	332	1,659	792	35	467	58	400	35	68,806	
	NFACM	1,387			15		28		15		
26	SM & TSI	1,055	4,220	2,016	35	1,188	58	1,016	35	175,024	
	TSI	332	1,327	634	35	374	58	320	35	55,082	
	NFACM				15		28		15		
27	SM & TSI	1,055	3,165	1,512	35	891	58	762	35	131,268	
	TSI	332	995	475	35	280	58	240	35	41,265	
	NFACM	1,387			15		28		15		
28	SM & TSI	1,055	2,110	1,008	35	594	58	508	35	87,512	
	TSI	332	664	317	35	187	58	160	35	27,541	
	NFACM	1,387			15		28		15		
29	SM & TSI	1,055	1,055	504	35	297	58	254	35	43,756	
	TSI	332	332	158	35	93	58	80	35	13,724	
	NFACM	1,387			15		28		15		
30	SM & TSI	1,055	0	0	35	0	58	0	35	0	
	TSI	332	0	0	35	0	58	0	35	0	
	NFACM	1,387			15		28		15		
Total Hours for Years 20 - 22										7,557,796	
Average Hours Per Year for Years 20-22											2,519,262

SM = surfacing material; TSI = thermal systems insulation. Both are friable ACM. NFACM = nonfriable ACM.
 Sources: AHERA RIA (EPA, 1987c), Table 4 and Appendix G; Addendum to ICR #2070-0091 Asbestos in Schools Rule (EPA, 1987a)

¹ This worksheet has been revised to include updated numbers of public primary and secondary schools, and private schools from the Dept. of Education's National Center for Education Statistics (NCES) for both the previous ICR period (years 17 through 19), and the current ICR period (years 20 through 22). NCES data used for years 17 through 19 were from 2000-2001, and were used in Section 6 of the previous ICR renewal, but were not included previously in this worksheet. NCES data for 2003-2004 were used for the current ICR renewal. These school figures will be updated by NCES in future years of the ICR, so new totals for both NFACM schools, and all schools, which are based on the NCES data, are not calculated for the period beyond the current 3-year period of this ICR renewal.

Worksheet A-2: Annual Recordkeeping Cost, by School Type and Asbestos Type²

Year	ACM Type	School Counts	Public Primary		Public Secondary		Private		Total Cost (\$)	Annual Total Cost (\$)
			No. of Schools	\$ per School	No. of Schools	\$ per School	No. of Schools	\$ per School		
17	SM & TSI	10,786	5,151	\$858	3,036	\$1,316	2,598	\$938	10,851,858	65,518,878
	TSI	3,392	1,620	\$858	955	\$1,316	817	\$938	3,413,086	
	NFACM	106,319	59,412	\$416	23,099	\$682	23,808	\$453	51,253,934	
18	SM & TSI	10,464	4,997	\$858	2,946	\$1,316	2,520	\$938	10,528,122	65,303,751
	TSI	3,290	1,571	\$858	926	\$1,316	792	\$938	3,309,430	
	NFACM	106,744	59,615	\$416	23,218	\$682	23,911	\$453	51,466,199	
19	SM & TSI	10,141	4,843	\$858	2,855	\$1,316	2,442	\$938	10,203,070	65,089,551
	TSI	3,189	1,523	\$858	898	\$1,316	768	\$938	3,208,886	
	NFACM	107,167	59,817	\$416	23,337	\$682	24,013	\$453	51,677,595	
20	SM & TSI	9,819	4,689	\$1,021	2,764	\$1,586	2,365	\$1,021	11,585,838	76,144,132
	TSI	3,087	1,474	\$1,021	869	\$1,586	744	\$1,021	3,642,812	
	NFACM	112,094	61,344	\$475	24,586	\$787	26,164	\$475	60,915,482	
21	SM & TSI	9,496	4,535	\$1,021	2,673	\$1,586	2,287	\$1,021	11,204,640	75,882,521
	TSI	2,986	1,426	\$1,021	841	\$1,586	719	\$1,021	3,523,871	
	NFACM	112,518	61,546	\$475	24,705	\$787	26,267	\$475	61,154,010	
22	SM & TSI	8,441	4,031	\$1,021	2,376	\$1,586	2,033	\$1,021	9,959,680	73,731,668
	TSI	2,654	1,268	\$1,021	747	\$1,586	639	\$1,021	1,837,161	
	NFACM	113,905	62,208	\$475	25,096	\$787	26,601	\$475	61,934,827	
23	SM & TSI	7,386	3,527	\$858	2,079	\$1,316	1,779	\$938	7,430,832	
	TSI	2,322	1,109	\$858	654	\$1,316	559	\$938	2,336,528	
	NFACM			\$416		\$682		\$453		
24	SM & TSI	6,331	3,023	\$858	1,782	\$1,316	1,525	\$938	6,369,296	
	TSI	1,991	951	\$858	560	\$1,316	479	\$938	2,002,220	
	NFACM			\$416		\$682		\$453		
25	SM & TSI	5,276	2,519	\$858	1,485	\$1,316	1,271	\$938	5,307,760	
	TSI	1,659	792	\$858	467	\$1,316	400	\$938	1,669,308	
	NFACM			\$416		\$682		\$453		
26	SM & TSI	4,220	2,016	\$858	1,188	\$1,316	1,016	\$938	4,246,144	
	TSI	1,327	634	\$858	374	\$1,316	320	\$938	1,336,316	
	NFACM			\$416		\$682		\$453		
27	SM & TSI	3,165	1,512	\$858	891	\$1,316	762	\$938	3,184,608	
	TSI	995	475	\$858	280	\$1,316	240	\$938	1,001,150	
	NFACM			\$416		\$682		\$453		
28	SM & TSI	2,110	1,008	\$858	594	\$1,316	508	\$938	2,123,072	
	TSI	664	317	\$858	187	\$1,316	160	\$938	668,158	
	NFACM			\$416		\$682		\$453		
29	SM & TSI	1,055	504	\$858	297	\$1,316	254	\$938	1,061,536	
	TSI	332	158	\$858	93	\$1,316	80	\$938	332,992	
	NFACM			\$416		\$682		\$453		
30	SM & TSI	0	0	\$858	0	\$1,316	0	\$938	0	
	TSI	0	0	\$858	0	\$1,316	0	\$938	0	
	NFACM			\$416		\$682		\$453		
Total Cost for Years 20-22									\$225,758,321	
Average Cost per Year for Years 20-22									\$75,252,774	

SM = surfacing material; TSI = thermal systems insulation. Both are friable ACM. NFACM = nonfriable ACM.

Sources: AHERA RIA (EPA, 1987c), Table 4 and Appendix G; Addendum to ICR #2070-0091, Asbestos in Schools Rule (EPA, 1987a)

Wage rates have been updated as described in the text.

² This worksheet has been revised to include updated numbers of public primary and secondary schools, and private schools from the Dept. of Education's National Center for Education Statistics (NCES) for both the previous ICR period (years 17 through 19), and the current ICR period (years 20 through 22). NCES data used for years 17 through 19 were from 2000-2001, and were used in Section 6 of the previous ICR renewal, but were not included previously in this worksheet. NCES data for 2003-2004 were used for the current ICR renewal. These school figures will be updated by NCES in future years of the ICR, so new total costs for both NFACM schools, and all schools, which are based on the NCES data, are not calculated for the period beyond the current 3-year period of this ICR renewal. Totals may not match totals in Section 6 worksheets due to rounding.

References

- U.S. Bureau of Labor Statistics. 2005. Occupational Employment Statistics: May 2005 National Industry-Specific Occupational Employment and Wage Estimates. Web site <http://www.bls.gov/oes/current/oes299011.htm>. See same [Occupational Employment Statistics, Occupational Employment and Wages, website for data for wage rates for occupation groups 299012, 370000, 430000, 110000, and 192041 used in the analysis.](http://www.bls.gov/oes/current/oes299011.htm)
- U.S. Bureau of Labor Statistics. 2006. Employment Cost Index, 2Q 2005 to 3Q 2006, 4Q 2005 = 100. Series ID's CIU3020000000000I, and CIU202S000200000I. Website <http://www.bls.gov/web/echistry.pdf>.
- U.S. Bureau of Labor Statistics. 2006a. Employer Costs for Employee Compensation 2Q 2005 to 3Q 2006. Series ID's CMU3010000000000D, CMU3020000000000D, and CMU2010000000000D, CMU2020000000000D. Website <http://www.bls.gov/news.release/pdf/ecec.pdf>.
- U.S. Department of Commerce. 2006. Bureau of Economic Analysis. Gross Domestic Product: Implicit Price Deflator. Series ID GDPDEF. Index 2000=100. <http://research.stlouisfed.org/fred2/data/GDPDEF.txt>.
- U.S. Department of Education. 2005. National Center for Education Statistics. Digest of Education Statistics: 2005. Table 84. Web site http://nces.ed.gov/programs/digest/d05/tables/dt05_084.asp
- U.S. EPA. 1987a. Office of Toxic Substances, Economics and Technology Division. Asbestos Hazard Emergency Response Act Regulatory Impact Analysis. September, 1987.
- U.S. EPA. 1987b. Office of Pesticides and Toxic Substances. Addendum to ICR #2070-0091 Asbestos-In-Schools Rule. October, 1987.
- U.S. EPA. 1991. ICR Renewal for the Asbestos Hazard Emergency Response Act (AHERA), Title II of the Toxic Substances Control Act (TSCA) - Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.
- U.S. EPA. 1993. Supplemental ICR for the Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.
- U.S. EPA. 1994. Renewal ICR for the Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.
- U.S. EPA. 1997. Renewal ICR for the Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.
- U.S. EPA. 2001. Renewal ICR for the Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.
- U.S. EPA. 2004. Renewal ICR for the Asbestos-Containing Materials in Schools Rule. OMB No. 2070-0091. EPA ICR #1365.

U.S. EPA. 2005. Office of Pollution Prevention and Toxics. . National Directory of AHERA Accredited Courses. November, 2005. Website <http://www.epa.gov/asbestos/ndaac.html>.

U.S. Office of Personnel Management. 2006. Salary Table 2006-DCB. Web Site <http://www.opm.gov/oca/06tables/html/dcb.asp>.