

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

Attachment F

Copies of Consultation Letters Sent and Received

From: William Dallas <William.Dallas@pgcps.org>
To: Robert Courtnage/DC/USEPA/US@EPA
Subject: EPA Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR)
Date: 01/23/2007 02:58 PM

Mr. Courtnage:

My answers are in the body of your original email.

William E. Dallas
Environmental Officer
Maintenance Department
Prince George's County Public Schools
13300 Old Marlboro Pike
Upper Marlboro, MD 20772
Office Number: 301-952-6559
Fax Number: 301-952-0346

-----Original Message-----

From: Courtnage.Robert@epamail.epa.gov
[mailto:Courtnage.Robert@epamail.epa.gov]
Sent: Thursday, January 11, 2007 2:02 PM
Subject: Fw: EPA Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR)

-- Forwarded by Robert Courtnage/DC/USEPA/US on 01/11/2007 02:00 PM --

Robert Courtnage/DC/USEPA/US
01/11/2007 01:58 PM
Subject: Fw: EPA Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR)

Happy New Year!

Please provide me any feedback you can as soon as possible so we may include your comments.

Cheers,

Robert

Robert T. Courtnage
Fibers and Organics Branch
National Program Chemicals Division, OPPT
Office of Prevention, Pesticides and Toxic Substances
U.S. EPA
Room 4353MM (EPA East Entrance)
1200 Pennsylvania Ave., NW (Mail Code - 7404T)
Washington, DC 20460
Phone - 202-566-1081 Fax - 202-566-0473

-- Forwarded by Robert Courtnage/DC/USEPA/US on 01/11/2007 01:56 PM --

Robert Courtnage/DC/USEPA/US
12/20/2006 02:08
Subject: Fw: EPA Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR)

Thanks in advance for working with us on our consultations for our renewal of the Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR). We have received an extension, so instead of the end of this week if you could provide us with feedback by January 10th of next year, it would be most appreciated. Happy Holidays!

-- Forwarded by Robert Courtnage/DC/USEPA/US on 12/20/2006 02:05 PM --

Robert Courtnage/DC/USEPA/US
12/12/2006 12:21 PM
Subject: EPA Asbestos-Containing Materials in Schools Rule Information Collection Request (ICR)

Greetings,

You have been recommended as a consultant for our renewal of the Asbestos-Containing Materials in Schools Information Collection Request (ICR). The Office of Management and Budget requires EPA to renew our ICRs every three years.

In 1986, Congress passed the Asbestos Hazard Emergency Response Act (AHERA), charging EPA with a significant expansion of the existing regulations on asbestos in schools. AHERA directed EPA to promulgate comprehensive standards for inspecting school buildings and implementing appropriate actions to respond to asbestos hazards in schools.

AHERA also required States to adopt and administer asbestos accreditation programs for asbestos professionals who perform work in schools. To assist the States in this effort, EPA was

instructed to establish a uniform model program of training and accreditation. In 1987, EPA promulgated its Model Accreditation Plan (MAP) for asbestos professionals.

Also in 1987, EPA published the final AHERA implementing regulations. The rule prescribed procedures for conducting building inspections, requirements for the development of management plans for ACM present in a school's buildings, requirements for the training of custodial and maintenance personnel and other school employees, standards for school building operations and maintenance activities, and air clearance standards for the reoccupancy of areas where asbestos abatement projects have been completed. As directed by the statute, EPA established a process for States to obtain waivers from the regulations. As of December 2006, ten States have received waivers because they are administering an asbestos-in-schools program that is at least as stringent as the AHERA regulations.

Based on the passage of the Asbestos School Hazard Abatement Reauthorization Act (ASHARA), in February 1994, EPA published interim final amendments to the MAP which increased the training hours required for worker and supervisor accreditation, added several definitions, and established procedures for withdrawing training course approvals and accreditation certificates.

Attached you will find our draft ICR. If you could, please provide answers via e-mail reply to the following 5 straight-forward questions after taking a look at the draft ICR renewal package. Due to an expedited schedule, it would be much appreciated if you could provide your responses to me by December 22nd, 2006.

I plan to follow up this e-mail with a call to each of you to answer any questions you may have. Thanks in advance for your participation in our consultation process.

(See attached file: MAP and AHERA ICR 2006.doc)

Here are the consultation questions:

1. Are the data collection and record keeping requirements for the EPA Asbestos-Containing Materials in Schools ICR clear and concise?

Yes

2. Are you aware of other sources the Agency could use for the requested data?

No

3. Would you make electronic submissions, if applicable?

Yes

4. Are the estimated burdens and costs associated with the Asbestos-Containing Materials in Schools Rule and Model Accreditation Plan accurate to the best of your knowledge?

Yes (to the best of my knowledge).

5. If we spoke to you before about this ICR, were your positions accurately reflected?

N/A

Sincerely,

Robert T. Courtnage
Fibers and Organics Branch
National Program Chemicals Division, OPPT
Office of Prevention, Pesticides and Toxic Substances
U.S. EPA
Room 4353MM (EPA East Entrance)
1200 Pennsylvania Ave., NW (Mail Code - 7404T)
Washington, DC 20460
Phone - 202-566-1081 Fax - 202-566-0473

SUSAN SCHWEBEL <seec@verizon.net
01/12/2007 03:34 PM
To: Robert Courtnage/DC/USEPA/US@EPA
Subject: Re: Fw: EPA Asbestos-Containing Materials in Schools Rule Information Collection

Courtnage.Robert@epamail.epa.gov wrote:

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01/11/2007 01:58 PM
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2. Are you aware of other sources the Agency could use for the requested data?

IN PENNSYLVANIA, SCHOOL INTERMEDIATE UNITS REPRESENT SCHOOLS ON A SINGLE OR MULTIPLE COUNTY BASIS. THEY MAY BE ABLE TO FUNCTION AS AN AGENCY FOR THE LEA UNITS REQUESTORS DATA. THEY TYPICALLY PROVIDE TRAINING FOR SCHOOL PERSONNEL BUT NOT ON EPA MATTERS LIKE AHERA AND ASHARA.

3. Would you make electronic submissions, if applicable?

YES

4. Are the estimated burdens and costs associated with the Asbestos-Containing Materials in Schools Rule and Model Accreditation Plan accurate to the best of your knowledge?

YES, I FUNCTION AS THE ASBESTOS DESIGNATED PERSON FOR SOME LEAS. SO I HAVE FIRST HAND KNOWLEDGE OF THE TIME BURDENS AND COSTS AND FIND THEM ACCURATE.

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N/A

Sincerely,

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