EPA ICR No. 1365.09; 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

					Annual Recordkeepin					e	
Year	ACM Previous		School	Public Primary			Public Secondary		ite	Total	A
I eal	Туре	Removals	School Counts	No. of Schools	Hours/ School	No. of Schools	Hours/ School	No. of Schools	Hours/ School	Total Hours	Annual Total Hours
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	2,483,51
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	2,473,37
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	2,463,72
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	7,385	3,527	35	2,079	58	1,779	35	306,292	
	TSI	332	2,322	1,110	35	653	58	559	35	96,289	
	NFACM	1,387	122,949	63,631	15	27,916	28	31,402	15	2,207,143	2,609,724
24	SM & TSI	1,055	6,330	3,023	35	1,782	58	1,525	35	262,536	
	TSI	332	1,991	952	35	559	58	479	35	82,507	
	NFACM	1,387	124,336	64,293	15	28,307	28	31,736	15	2,233,031	2,578,074
25	SM & TSI	1,055	5,275	2,519	35	1,485	58	1,271	35	218,780	
	TSI	332	1,658	794	35	465	58	399	35	68,725	
	NFACM	1,387	125,723	64,955	15	28,698	28	32,070	15	2,258,919	2,546,424
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	

¹ This worksheet has been revised from the previous ICR renewal supporting materials (2007) to include numbers of public primary and secondary schools, and private schools from the Dept. of Education's National Center for Education Statistics (NCES) for the current ICR period (years 23 through 25). NCES data for 2007-2008 (the latest available data) were used for the current ICR renewal. The school figures for beyond year 25 will be updated 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-1. Annual Recordkeeping Burden, by School Type and Asbestos Type												
		Previous		Public Primary		Public Secondary		Private					
Year	АСМ Туре	Year Removals	School Counts	No. of Schools	Hours/ School	No. of Schools	Hours/ School	No. of Schools	Hours/ School	Total Hours	Annual Total Hours		
	TSI	332	0	0	35	0	58	0	35	0			
	NFACM	1,387			15		28		15				
Total H	lours for Ye	ears 23 - 25								7,734,222			
Averag	e Hours Pe	r Year for Yea	ars 23-25								2,578,074		
61 (c •					C + 1 1 A							

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)

	Worksheet A-2: Annual Recordkeeping Cost, by School Type and Asbestos Type ²									
			Public Pr	Public Se	Public Secondary		ite			
Year	АСМ Туре	School Counts	No. of Schools	\$ per School	No. of Schools	\$ per School	No. of Schools	\$ per School	Total Cost (\$)	Annual Total Cost (\$)
17	SM & TSI	10,786	5,151	\$858	3,036	\$1,316	2,598	\$938	10,851,858	
	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	65,518,878
18	SM & TSI	10,464	4,997	\$858	2,946	\$1,316	2,520	\$938	10,528,122	
	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	65,303,751
19	SM & TSI	10,141	4,843	\$858	2,855	\$1,316	2,442	\$938	10,203,070	
	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	65,089,551
20	SM & TSI	9,819	4,689	\$1,021	2,764	\$1,586	2,365	\$1,021	11,585,838	
	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	76,144,132
21	SM & TSI	9,496	4,535	\$1,021	2,673	\$1,586	2,287	\$1,021	11,204,640	, ,
	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	75,882,521
22	SM & TSI	8,441	4,031	\$1,021	2,376	\$1,586	2,033	\$1,021	9,959,680	, ,
	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	73,731,668
23	SM & TSI	7,385	3,527	\$1,116	2,079	\$1,649	1,779	\$1,116	9,349,767	, ,
	TSI	2,322	1,110	\$1,116	653	\$1,649	559	\$1,116	2,939,401	
	NFACM	122,949	63,631	\$526	27,916	\$877	31,402	\$526	74,374,657	86,663,825
24	SM & TSI	6,330	3,023	\$1,116	1,782	\$1,649	1,525	\$1,116	8,014,086	, ,
	TSI	1,991	952	\$1,116	559	\$1,649	479	\$1,116	2,518,787	
	NFACM	124,336	64,293	\$526	28,307	\$877	31,736	\$526	75,240,464	85,773,337
25	SM & TSI	5,275	2,519	\$1,116	1,485	\$1,649	1,271	\$1,116	6,678,405	
	TSI	1,658	794	\$1,116	465	\$1,649	399	\$1,116	2,098,173	
	NFACM	125,723	64,955	\$526	28,698	\$877	32,070	\$526	76,106,271	84,882,849
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		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		254		1,061,536	

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), as discussed in the footnote to Worksheet A-1. These school figures will be updated further using data from NCES in future years of the ICR, so new total costs for both NFCAM 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.

	Worksheet A-2: Annual Recordkeeping Cost, by School Type and Asbestos Type											
			Public Primary		Public Secondary		Private					
Year	АСМ Туре	School Counts	No. of Schools	\$ per School	No. of Schools	\$ per School	No. of Schools	\$ per School	Total Cost (\$)	Annual Total Cost (\$)		
	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 C	Cost for Years 23	-25								\$257,320,011		
Averag 23-25	0 1									\$85,773,337		
SM = s	SM = surfacing material; TSI = thermal systems insulation. Both are friable ACM. NFACM = non-friable ACM.											
Sources: AHERA RIA (EPA, 1987c), Table 4 and Appendix G; Addendum to ICR #2070-0091, Asbestos in Schools Rule (EPA, 1987a)												
Wage r	Wage rates have been updated as described in the text.											