**EPA ICR No. 1365.10; 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 Type[[1]](#footnote-1) | | | | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 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 | 7,385 | 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 | 1,387 | 126,635 | 65,786 | 15 | 28,819 | 28 | 32,030 | 15 | 2,274,172 | 2,504,278 |
| 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 | 128,023 | 66,449 | 15 | 29,210 | 28 | 32,364 | 15 | 2,300,075 | 2,472,608 |
| 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 | 129,409 | 67,111 | 15 | 29,600 | 28 | 32,698 | 15 | 2,325,935 | 2,440,988 |
| 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 Hoursfor Years 26 - 28 | | | |  | |  | |  | | 7,417,874 |  |
| Average Hours Per Year for Years 26-28 | | | |  | |  | |  | | 2,472,625 | |
| 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]](#footnote-2) | | | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 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 |  |
| 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 | $1,242 | 1,188 | $1,916 | 1,016 | $1,242 | 6,041,952 |  |
| TSI | 1,327 | 634 | $1,242 | 374 | $1,916 | 320 | $1,242 | 1,901,452 |
| NFACM | 126,635 | 65,786 | $576 | 28,819 | $949 | 32,030 | $576 | 83,691,247 | 91,634,651 |
| 27 | SM & TSI | 3,165 | 1,512 | $1,242 | 891 | $1,916 | 762 | $1,242 | 4,531,464 |  |
| TSI | 995 | 475 | $1,242 | 280 | $1,916 | 240 | $1,242 | 1,424,510 |
| NFACM | 128,023 | 66,449 | $576 | 29,210 | $949 | 32,364 | $576 | 84,636,578 | 90,592,552 |
| 28 | SM & TSI | 2,110 | 1,008 | $1,242 | 594 | $1,916 | 508 | $1,242 | 3,020,976 |  |
| TSI | 664 | 317 | $1,242 | 187 | $1,916 | 160 | $1,242 | 950,725 |
| NFACM | 129,409 | 67,111 | $576 | 29,600 | $949 | 32,698 | $576 | 85,580,384 | 89,552,086 |
| 29 | SM & TSI | 1,055 | 504 |  | 297 |  | 254 |  |  |  |
| TSI | 332 | 158 |  | 93 |  | 80 |  |  |
| NFACM |  |  |  |  |  |  |  |  |  |
| 30 | SM & TSI | 0 | 0 |  | 0 |  | 0 |  | 0 |  |
| TSI | 0 | 0 |  | 0 |  | 0 |  | 0 |
| NFACM |  |  |  |  |  |  |  |  |  |
| Total Cost for Years 26-28 | | |  | |  | |  | | $271,779,289 | |
| Average Cost per Year for Years 26-28 | | |  | |  | |  | | $90,593,096 | |
| 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 rates have been updated as described in the text. | | | | | | | | | | |

1. This worksheet has been revised from the previous ICR renewal supporting materials (2011) 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 26 through 28). NCES data for 2009-2010 (the latest available data) were used for the current ICR renewal. The school figures for beyond year 28 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. [↑](#footnote-ref-1)
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. [↑](#footnote-ref-2)