

**Supporting Statement for a Request for OMB Review under
the Paperwork Reduction Act**

PART A

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Survey of the Public and Commercial Building Industry

EPA ICR No.: 2494.01

OMB Control No.: 2070-NEW

1(b) Short Characterization

EPA's Office of Pollution Prevention and Toxics (OPPT) is investigating whether renovation, repair and painting (RRP) activities in public and commercial buildings (P&CBs) create lead-based paint hazards. If EPA finds that these activities create lead-based paint hazards, the Agency will consider the types of regulatory action that might be appropriate to control the resulting exposures to lead. EPA seeks to survey construction contractors, property managers and lessors, and building occupants about RRP activities in P&CBs.

The information collected through the survey will allow OPPT to predict a baseline for the incidence of different types of RRP activities that disturb lead-based paint in P&CBs, the methods that are used to conduct these activities, the work practices that are used to contain and clean the resulting dust, and the characteristics of the buildings. OPPT will use this information to estimate the resulting exposures to lead dust, which will inform Agency decision making about the need for and scope of potential regulatory or other actions to reduce exposures to lead dust from RRP activities in P&CBs. If EPA determines that a regulation is needed, the Agency will use this data to assess the incremental benefits and costs of potential options to reduce such exposures. If this survey is not conducted EPA would have to rely on assumptions, anecdotal information, or information collected from convenience samples, rather than calculating nationally representative parameter estimates from a probability sample.

The primary objectives of the Public and Commercial Building Industry survey include: (1) gathering information on building and activity patterns that may affect exposures to lead dust from RRP activities in P&CBs; (2) determining the number of firms that perform RRP activities in P&CBs, (3) determining the types and numbers of RRP activities that are performed, (4) determining the extent to which various work practices that disturb painted surfaces are currently being used in RRP jobs in P&CBs, and (5) determining the extent to which various work practices for the containment and cleanup of lead dust are currently being used in RRP jobs performed in P&CBs.

The survey will collect information from three different groups: (A) establishments that perform RRP activities in P&CBs for compensation on a contract basis, hereafter referred to as contractors; (B) lessors and managers of P&CBs; and (C) building occupants of P&CBs (both owners and tenants) who may use their own staff to perform RRP activities. There will be separate questionnaires for each group. Information will be collected using telephone and online survey instruments.

The information collection will be a one-time data collection. Participation will be voluntary. Establishments will be selected using a stratified random sampling method. EPA

plans to have 402 respondents complete a questionnaire. Because of the difficulty of finding the population of the establishments engaged in RRP activities in P&CBs, EPA anticipates having to contact approximately 8,485 entities and ask them a few, brief screening questions. All of these entities are counted as respondents for the purpose of calculating the burden of the survey.

Information on whether an establishment performs RRP activities in P&CBs is not available from any readily accessible source. Therefore, it is not feasible to design a random sampling method for the survey without contacting a large number of establishments and asking them a few brief questions in the screening portion of the questionnaire. It is worth noting that the information collected from the estimated 8,485 establishments that will not complete the full questionnaire is still very important to EPA. Specifically, together with the information collected from the 402 respondents expected to complete the full survey it will provide a basis for estimating the population of establishments engaged in RRP activities in P&CBs. The questionnaire has been designed to quickly screen out respondents who do not perform RRP activities in P&CBs, in order to reduce the burden of locating eligible respondents.

EPA estimates that the screening portion of the survey will take about 3 minutes to complete on average. For respondents completing the contractor questionnaire, it is estimated that the remaining portion of the survey will require about 30 minutes on average. For respondents completing the property lessor/manager or building occupant questionnaires, the remaining portion of the survey is estimated to require about 5 minutes on average. EPA estimates that the roughly 8,485 survey respondents will incur a total burden of 564 hours for both the screening questions and the full survey. The total cost to respondents of this one-time collection is estimated to be \$34,103. The cost to the agency is estimated to be approximately \$710,000.

2. NEED AND USE FOR THE COLLECTION

2(a) Need and Authority for the Collection

Title IV of TSCA, 15 U.S.C. 2681 et seq. (see Attachment 1), was enacted to assist the Federal Government in reducing lead exposures, particularly those resulting from lead-based paint (LBP). Section 402(c)(3) of TSCA specifically requires EPA to revise its Lead-Based Paint Activities regulations,¹ promulgated under TSCA section 402(a), to apply to those renovation and remodeling activities in target housing, public buildings constructed before 1978, and commercial buildings that create lead-based paint hazards. In April 2008, EPA promulgated the RRP rule (40 CFR part 745) under TSCA section 402(c)(3).² The RRP rule covers renovation, repair, and painting activities in target housing (which is most pre-1978 housing) and child-occupied facilities (which includes a subset of P&CBs in which young children spend a significant amount of time).

Several lawsuits were filed against EPA asserting, among other things, that the Agency violated TSCA section 402(c)(3) by failing to address renovation activities in P&CBs. These lawsuits (brought by environmental and children's health advocacy groups as well as a homebuilders association) were consolidated in the Circuit Court of Appeals for the District of Columbia Circuit. EPA engaged in collective settlement negotiations with all the parties and on August 24, 2009, EPA entered into an agreement with environmental and children's health advocacy groups in settlement of their lawsuits.³ Shortly thereafter the homebuilders association

¹ Lead; Requirements for Lead-Based Paint Activities in Target Housing and Child-Occupied Facilities; Final Rule. Federal Register (61 FR 45778, August 29, 1996).

² Lead; Renovation, Repair, and Painting Program; Final Rule. Federal Register (73 FR 21692, April 22, 2008).

³ EPA. Sierra Club, etc. Settlement, as amended and modified (2009, 2011, and 2012).

voluntarily dismissed its challenge to the rule. As part of this settlement agreement, EPA agreed to commence rulemaking to address renovations in P&CBs (other than child-occupied facilities) to the extent such renovations create LBP hazards. As an initial step, EPA issued an ANPRM in the Federal Register on renovations in public and commercial buildings on May 6, 2010.⁴

The settlement agreement has been amended and modified several times (primarily to extend deadlines), with the most recent amendment having been entered into by the parties on September 7, 2012. Under the terms of the amended settlement agreement, the date by which EPA has agreed to either sign a proposed rule covering RRP activities in P&CBs, or determine that these activities do not create LBP hazards, is July 1, 2015. If EPA publishes a proposed rule in the Federal Register, EPA agreed to take final action on or before the date 18 months after the proposed rule has published.

In addition, as part of the agreement EPA held a public meeting on June 23, 2013, and offered an opportunity for stakeholders and other interested members of the public to provide data and other information that EPA may use in making its regulatory determinations.

The purpose of this ICR is to fill some of the key data gaps for EPA's exposure assessment and for its economic analysis of potential options to reduce exposure to lead dust from RRP activities in P&CBs. Without the survey, the exposure assessment and the economic analysis would need to rely on assumptions, anecdotal information, or information collected from convenience samples, rather than calculating nationally representative parameter estimates from a probability sample. The survey results are expected to be more representative than these alternatives.

2(b) Practical Utility and Users of the Data

This survey will allow EPA to produce statistically valid estimates for the population of RRP firms and jobs that disturb paint in P&CBs, and the work practices that are used. EPA will use the data collected through this one-time survey as part of its investigation. Without the proposed information collection, these estimates would have to be derived from assumptions, anecdotal information, or information collected from convenience samples, rather than calculating nationally representative parameter estimates from a probability sample.

The primary purposes of this survey include gathering information on building and activity patterns that may affect exposures to lead dust from RRP activities in P&CBs; estimating the baseline usage of particular work practices, and how this usage varies with the type of RRP job; determining the number of firms that perform RRP activities in P&CBs; and determining the types and numbers of RRP activities that are performed.

Secondly, the survey will attempt to collect information on how the proportion of jobs that use particular practices differs between different types of firms. In addition to baseline work practice data, the survey will collect information on the number of contractors that are already trained and certified under the existing RRP Program.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

⁴ Lead; Renovation, Repair, and Painting Program for Public and Commercial Buildings; Advanced Notice of Proposed Rulemaking. Federal Register (75 FR 24848, May 6, 2010).

To the best of EPA's knowledge, the data to be collected through this survey is not available elsewhere. EPA has investigated various sources of data on RRP firms and practices, including other surveys, trade association literature, academic studies, government reports, and information provided to EPA through public comments. In general, other sources of information on RRP either do not address the issues where EPA needs data; are based on judgments rather than a comprehensive and rigorous collection of information; lack the specificity and level of detail that EPA is requesting in this survey in order to estimate the potential risks, the industry baseline, and the costs and benefits of potential regulatory requirements; or are not representative of the universe of entities and activities associated with RRP in P&CBs.

Although EPA has already collected information about RRP practices from various Federal entities, this information may not be representative of RRP activities in P&CBs. Renovations of Federal buildings can cost tens or hundreds of millions of dollars and take multiple years to conduct. This is very different from the RRP activities that many entities (including small businesses) undertake in P&CBs such as preparing surfaces for repainting in a motel, creating an opening in a wall to perform electrical work in a doctor's office, or removing a section of a wall in order to repair a broken water pipe in a shopping mall. Federal entities may have more time and money to address LBP in the absence of any requirement to do so. Thus, the prevalence of work practices to control lead exposures from RRP activities may differ between the Federal government and other entities. EPA's proposed probabilistic method for survey sampling allows a sampling error to be calculated, so it is a better approach from a statistical standpoint than limiting the data collection to Federal entities. Administering the survey to a random sample of entities will better describe the characteristics of P&CBs, P&CB contractors, RRP activities in P&CBs, and baseline work practices in P&CBs. Therefore, EPA's survey does not duplicate existing data sources.

3(b) Public Notice Required Prior to ICR Submission to OMB

In proposing this ICR, EPA provided a 60-day public notice and comment period that ended on December 6, 2013. EPA received two comments, from the Commercial Properties Coalition and from the Independent Electrical Contractors, during the comment period. Copies of the comments and EPA's response to the comments are included in Attachment 3.

3(c) Consultations

Additionally, under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an ICR to OMB for review and approval. In accordance with this regulation, EPA submitted questions to nine parties via email. The individuals contacted were:

Associated General Contractors

Leah Pilconis
pilconisl@agc.org

Building Owners Managers Association

Karen Penafiel
kpenafiel@boma.org

Finishing Contractors Association

Bob Weaver
bweaver@finishingcontractors.org

National Association of Home Builders

Tabby Waqar
twaqar@nahb.org

National Association of Plumbing–Heating–Cooling Contractors

Mark Riso
riso@naphcc.org

National Association of the Remodeling Industry

Patrick Kennedy
pkennedy@superiorwoodcraft.com

National Roofing Contractors Association

Harry Dietz
hdietz@nrca.net

National Systems Contractors Association

Kathy Mrosko
cmrosko@nsca.org

Painting and Decorating Contractors of America

Mark Casale
markcasale@paintspecialists1.com

EPA received no responses to its solicitation for consultations. A copy of EPA’s consultation e-mail to the above nine potential respondents is included in Attachment 2.

EPA also conducted a pretest of the contractor survey instrument with 6 respondents. The respondents were asked to comment on the ease of answering the questions and about how they interpreted the questions. Several changes to the draft instrument were made based on insights gained by conducting the pretest (see Subpart B of this ICR supporting statement for a description of the changes).

3(d) Effects of Less Frequent Collection

This survey is a *one time only* data collection activity for the respondents.

3(e) General Guidelines

This information collection complies with the guidelines in 5 CFR 1320.5(d)(2).

3(f) Confidentiality

EPA is not collecting information of a sensitive or private nature. Only the contractor conducting the survey for EPA will have access to personal identifiers in the raw survey data. (These personal identifiers include the respondent’s name, the respondent’s phone number, and the name of the organization the respondent works for.) All personal identifiers will be stripped from the data before it is conveyed to EPA, so the respondents will be anonymous. The original survey database will remain under the control of the contractor hired to perform the survey.

3(g) Sensitive Questions

Not applicable. The information requested is not sensitive in nature.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

Table 4.1 shows the North American Industrial Classification System (NAICS) codes of the establishments affected by this ICR.

Table 4.1: Respondents Primary Industries: NAICS and Definitions	
NAICS Code	NAICS Definition
A. Contractors	
2361	Residential Building Construction
2362	Nonresidential Building Construction
2381	Foundation, Structure, and Building Exterior Contractors
2382	Building Equipment Contractors
2383	Building Finishing Contractors
2389	Other Specialty Trade Contractors
B. Lessors, Property Managers, and Facility Support Services	
5612	Facilities Support Services
53112	Lessors of Nonresidential Buildings (except Miniwarehouses)
53131	Real Estate Property Managers
C. Building Occupants	
All	Building occupants include entities from all NAICS except those listed above

4(b) Information Requested

(i) Data Elements

This survey will be administered to (A) contractors, (B) lessors and property managers, and (C) building occupants (both owners and tenants). The survey will employ mixed-mode online and phone data collection. An initial notification letter to respondents will explain the survey and provide instructions for completing the survey online. Those respondents who do not complete the online survey will be contacted by telephone using trained interviewers calling from a survey telephone center. Respondents that confirmed that they do nonresidential work, but did not complete the survey after 8 call attempts will be sent an additional mail or courier mail contact with an invitation to complete the survey on the web. Non-responders who have provided an email address will receive up to two follow-up email reminders, as needed. Table 4.2 summarizes the information the survey will request from respondents. The survey instruments are included as attachments to this ICR supporting statement. In order to reduce respondent burden, lessor and property managers and building occupants are not asked all the questions that are being put to contractors. Instead, these groups are only asked questions that they are in a unique position to answer.

(ii) Respondent Activities

Individuals who are contacted to participate in this survey could potentially perform each of the following tasks:

- Read notification letter;
- Listen to or read to introductory information;
- Respond to screening questions; and
- Complete survey

These activities represent a voluntary information collection for each respondent and are not customary practices of the respondents.

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION

5(a) Agency Activities

The Agency will conduct the following activities to complete the survey:

- Send letters to respondents, notifying them of the upcoming survey and instructions on how to complete the online version of the final approved questionnaire;
- Place up to 8 telephone calls (as needed) to each respondent who did not complete the survey online to identify a knowledgeable person to complete the survey and complete the survey over the phone using the Computer Assisted Telephone Interview (CATI) instrument based on final approved questionnaire;
- Eligible respondents who are particularly hard to reach will be sent an additional mail contact with invitation to complete the survey on the web. Non-responders who have provided an email address will receive up to two follow-up email reminders, as needed;
- Preliminary data review;
- Calculation of sampling weights;
- Non-response bias study;
- Performance of weighted statistical summaries, variance estimation, and technical analyses; and
- Report findings.

Question Category	Purpose of Questions	Question Number in Questionnaire		
		Contractor Instrument	Property Manager/ Lessor Instrument	Building Occupant Instrument
Respondent Identification	These questions will be used to identify the individual at the firm with the knowledge required to complete the survey.	S1-S5	S1-S5	S1-S5
Screening and Scope	These questions will be used to determine whether a respondent performs RRP activities in P&CBs. Only those who perform RRP activities in P&CBs will be asked to complete the full survey. Responses from the screening and scope questions will be used to estimate the universe of relevant firms.	Q1-Q2B	Q1-Q3	Q1-Q3
Firm Type and Size	Responses from these questions will be used to assign the appropriate sampling weights.	Q3-Q3B	Q4-Q6	Q4-Q6
Total Number of Activities	<p>The survey includes 11 categories of RRP activities that disturb painted surfaces. For each of these 11 activity categories, the survey asks two questions: (1) the total number of jobs and (2) the total number where more than a minor amount of paint is disturbed by the respondent establishment's employees. The response to the second question is of most interest for the analysis. The primary purpose of the first question will be to aid in the respondents' recall of an accurate answer to the second question.</p> <p>Contractors who report painting activities will be asked about the numbers of activities where they use the following paint removal techniques: (1) open flame or torch, (2) high temperature heat gun, (3) abrasive blasting, and (4) needle gun/scaler. In general, the survey collects information about paint removal techniques only for the most recent job a respondent performed. However, these four techniques are the exception because they potentially generate high levels of lead dust and are believed to be uncommon enough that information about them may not be captured if respondents are only asked about their most recent job.</p>	Q4-Q5.4	Q7-Q7k2	Q7-Q7k3
Recent Job: Job Size, Job Duration, LBP Testing, Access to Work Area	A single activity type that was reportedly performed by each respondent will be randomly selected for a more detailed series of questions. Once the activity type is selected, the respondent will be prompted to recall the most recent job where LBP might have been disturbed (either because a test indicated the presence of LBP or because surfaces coated with older paint that might have been applied before 1978 were disturbed). If there were no recent jobs where LBP may have been disturbed they will be asked about the most recent job.	Q5.5-Q5.10	Q8.1-Q8.5	Q8.1-Q9.5

	<p>Respondents will be asked to characterize the type of building, the number of stories the building has (when asked about an exterior job) and the number of rooms and walls/ceilings where painted surfaces were disturbed (when asked about an interior job). This will provide information on how much paint might be disturbed and the number of people potentially exposed to dust generated.</p> <p>For respondents being asked about a recent painting job, they will be asked the percent of the painted surface disturbed and the average number of layers of paint that were removed during the paint preparation. This will be used to estimate how much paint was removed.</p> <p>For respondents being asked about a recent window or exterior door job, they will be asked how many windows or doors were replaced. This will be used to estimate how much paint was disturbed.</p> <p>All respondents will be asked about: (1) the total duration of the job, (2) the times of day the work was done, and (3) access to the work area by building occupants. Responses to these questions will be used to inform the level of exposure building occupants might experience.</p>			
Job Combinations	For the most recent activity a respondent is asked about, s/he will be asked to report what other activities were performed at the same time. The responses to these questions will be used to ensure that the estimates of the number of activities are not based on double counting.	Q6-Q6k	N/A	N/A
Containment	There are seven questions related to dust containment practices. Responses to these questions will be used to estimate the extent to which firms are already using containment practices. One question is asked to all respondents (Q8a), three are only asked to those being asked about a recent exterior job (Q8b, Q8c, Q8d), and three are only asked to those being asked about a recent interior job (Q8e, Q8f, Q8g).	Q7-Q7g	N/A	N/A
Cleanup	Responses to these questions will be used to estimate the extent to which firms are already using cleaning practices. There are eight questions related to cleanup practices that will be asked to all respondents being asked about a recent interior job. Those that report vacuuming will be asked if they used a HEPA vacuum. Those that reported that there were uncarpeted floors will be asked if they mopped.	Q8-Q8k	N/A	N/A

Paint Preparation and Removal Techniques	<p>Respondents being asked about a recent job involving paint preparation will be asked about the paint preparation and removal techniques they used. There are a total of 16 questions about paint preparation and removal techniques:</p> <ul style="list-style-type: none"> • 9 are asked to all respondents • 7 are asked conditional on an affirmative response to another question 	Q9a-Q10	N/A	N/A
Routine Cleaning	Respondents will be asked how often most areas of the building receive routine janitorial cleaning.	N/A	Q9	Q10
Motivation for lead-safe work practices	Respondents will be asked what one or two factors usually influence the level of dust containment and cleaning for a given job in P&CBs. This is asked to help EPA understand what motivates the use of lead safe work practices.	Q11	N/A	N/A
Baseline RRP Certification	Respondents will be asked whether they are already certified under the residential rule. This is asked because being certified for residential work may affect firms' baseline work practices in P&CBs. It will also be used to estimate the potential costs if additional firms are required to become certified in order to work in P&CBs.	Q12	N/A	N/A
Open Ended	Respondents will be given the option to provide additional comments or information.	Q13	Q11	Q12

5(b) Collection Methodology and Management

Information will be collected using telephone and online survey instruments. Samples of RRP contractors, property managers/lessors, and building occupants will be drawn from the Dun & Bradstreet “Dun’s Market Identifiers” (DMI) file provided by Survey Sampling, Inc. A telephone and online mixed-mode survey appears to be the most appropriate approach for minimizing the two main anticipated challenges: (1) problems of recall (working from memory) and understanding (are the terms used familiar to the respondent), and (2) problems in contacting people who may spend little time in an office. Telephone surveys maximize cooperation through direct contact with the respondents and provide an opportunity to clarify terms and aid recollection through probes. Telephone surveys also provide a rapid turnaround time. Many respondents who may spend little time in the office and have busy schedules may be more likely to respond to an online survey. The online questionnaire can also include more instructions and definitions of terms for respondents that need clarification. In addition, the online survey is expected to make it easier to elicit responses from larger firms, who are less likely to have a single individual who can provide the answers to all questions, because multiple individuals can collaborate on the response.

The survey field period will be relatively short and the target population is not likely to be motivated to participate in the survey. Contractor respondents are expected to be an especially difficult population to reach and motivate to participate in the study. They are much less likely than building occupants or management/lessor companies to be in the office during business hours. Based on experience with the pretest and prior informal EPA surveys (i.e., surveys administered to fewer than 10 respondents), this population is not likely to be motivated to participate in the survey. (Although not strictly comparable, a prior informal EPA survey of renovation contractors required contacting nearly 1,000 respondents to find 9 that were in the office at the time of the call and would agree to complete the survey.) Because EPA expects that it will be extremely difficult to get contractors to agree to participate in the survey, the EPA contractor who is administering the survey will offer an incentive of \$50 for eligible respondents who complete the full survey. For budget estimation purposes, EPA’s contractor estimated that with the \$50 incentive 1,645 of the 2,632 potential respondents that are successfully contacted will complete the screener portion of the survey. Getting 1,645 respondents to agree to complete the screener portion of the survey by successfully contacting 3,500 respondents is the break-even point for the incentive cost. Thus, a reduction of 25% or more in the number of respondents EPA’s contractor needs to successfully contact would mean that the cost of the incentive would be recouped through lower survey administration costs. Thus, the Agency believes that the costs of administering the survey would be considerably higher without offering the incentive for contractors.

Because building occupants and management/lessor companies are more likely to be in the office during business hours and the survey for these respondents is much shorter in duration (5 minutes compared to 30 minutes for the contractor survey) an incentive is not necessary for these groups of respondents.

A mail survey would be very ineffective in this situation, although respondents will receive an initial notification letter describing the survey and encouraging them to follow the instructions provided for completing the survey using the online instrument.

Those respondents who do not complete the survey online will be contacted by telephone by trained interviewers calling from a survey telephone center (Abt SRBI). The telephone survey instrument will use a CATI screener questionnaire and detailed interview questionnaire. The main advantage of a telephone survey is the ability to make multiple call attempts over a

relatively short field period. The call attempts and scheduled call backs can be customized to the hours that contractors are available to respond to the survey – this may involve early morning calls and late afternoon/evening calls. The screener questionnaire includes several questions involving skip patterns and terminations that depend on whether the respondent is eligible to complete the detailed interview. The detailed interview also contains some key skip patterns and a series of questions related to work practices. This type of questionnaire design is well suited for both the online and CATI administration. The telephone survey will be conducted from an Abt SRBI telephone center where trained supervisors and interviewers will be assigned to the study.

5(c) Small Entity Flexibility

Small entities make up the majority of the establishments that perform the RRP projects that are of interest in this survey. Therefore, since this is the primary target population for the survey, the majority of respondents will be small entities. The instrument has been developed to minimize the burden on all respondents while obtaining sufficient and accurate information.

5(d) Collection Schedule

Exhibit 5.1 provides the schedule of the various tasks involved in conducting the proposed survey. As shown in the schedule, data collection would start within one week of OMB approval of the ICR and would end nine weeks later. Telephone data collection will start one week after the pre-notification letter. An email alert will be sent to the screened and eligible non-responding businesses after seven weeks to encourage them to complete the survey on the online. EPA would then process the data and analyze it for potential non-response bias.

Exhibit 5.1: Survey Collection Schedule														
Task	Week (from receipt of OMB approval)													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Send pre-notification letter to respondents in selected sample	■													
Conduct telephone calls to conduct screener and main questionnaire to complete 120 responses		■	■											
Analyze data collection of the first two weeks to decide if sample allocation needs to be modified				■	■									
Resume telephone interviews						■	■	■						
Send out email alert to eligible non-responding sample								■	■					
Process data										■	■			
Analyze data, including potential non-response bias												■	■	■

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

This section details the estimated burden to respondents participating in this ICR. For the contractor questionnaire, the accuracy of EPA's burden estimates was confirmed during the survey pretest. The estimates of the time burden involved in responding to the other two questionnaires are based on the length of the survey instruments. It is worth noting that the burden on respondents will be less than the length of the questionnaires might seem to imply because no respondents will need to answer all of the questions listed. For example, after a respondent completes Question 4 in the contractor questionnaire a single activity type will be selected and the respondent will only need to respond to additional questions relevant to that job type. For example, respondents who are being asked about replacing windows will not be asked questions about paint removal techniques, and respondents being asked about exterior painting will not be asked questions about interior containment and clean-up practices.

The respondent burden is presented by respondent type. Two types of respondents were identified:

- Ineligible respondents do not perform or make decisions related to RRP activities in P&CBs. They complete a portion of the survey screening to determine their ineligibility. Hereafter, respondents of this type are referred to as initial completes.
- Eligible respondents perform or make decisions related to RRP activities in P&CBs. Hereafter, respondents of this type are referred to as full completes.

It is estimated that the screening portion of the survey will take about 3 minutes on average. For respondents completing the contractor questionnaire, it is estimated that the remaining portion of the survey will require about 30 minutes on average. For respondents completing the property lessor/manager or building occupant questionnaires, the remaining portion of the survey is estimated to require about 5 minutes on average. Table 6.1 summarizes the burden per respondent.

Respondent Type	Average Per-Respondent Burden*
Initial Completes	0.05 hours
Full Completes (Contractors)	0.55 hours
Full Completes (Lessors, Property Managers, and Facility Support Services; Building Occupants)	0.13 hours
*Note that the respondent burden for a full complete includes the time to answer the screening questions.	

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

EPA estimated respondent costs using the burden estimates presented above and the average wage figures provided by the Bureau of Labor Statistics (BLS) occupational employment statistics series. Wage rates for each category of personnel are derived with methods and from sources either identical to or similar to those used in prior ICR renewals and economic analyses for EPA's RRP program. According to the December 2012 BLS data for Employer Costs for

Employee Compensation, wages and salaries accounted for 69.2% of employee compensation, implying a wage multiplier of 1.445.⁵ Based on Appendix I of the National Association of Home Builders' 2010 Cost of Doing Business Study, an additional 8.3% was added to the fringe multiplier for overhead costs to estimate a multiplier of 1.53 for fully loading wages. A uniform loading factor of 53% for fringe benefits and overhead was applied to all categories of labor for this ICR.

Contractors' fully loaded wages (\$47/hour) are estimated from the wages earned by First-Line Supervisors/Managers of Construction Trades and Extraction Workers (Occupation 47-1011). Lessors and property managers' fully loaded wages (\$47/hour) are estimated from the wages earned by Property, Real Estate and Community Association Managers (Occupation 11-9140). The wage rates (\$78/hour) for building occupant respondents are estimated as the fully loaded wages earned by Miscellaneous Managers (Occupation 11-9190). Table 6.2 presents the wages for the occupations that best match the ICR labor categories. Table 6.3 presents the individual respondent costs by respondent type associated with this ICR.

<i>ICR Labor Category</i>	<i>BLS Occupation Category</i>	<i>May 2012 Hourly Wage Rate</i>	<i>Hourly Wage with Fringe and Overhead</i>
Contractors	First-Line Supervisors of Construction Trades and Extraction Workers	\$30.40	\$47
Lessors and Property Managers	Property, Real Estate, and Community Association Managers	\$30.56	\$47
Building Occupants	Miscellaneous Managers	\$50.79	\$78

Respondent Type	Average Per-Respondent Burden*	Respondent Loaded Hourly Wage (2012\$)	Average Labor Cost per-Respondent
Contractors			
Initial Completes	0.05 hours	\$47	\$2.35
Full Completes	0.55 hours	\$47	\$25.85
Lessors and Property Managers			
Initial Completes	0.05 hours	\$47	\$2.35
Full Completes	0.13 hours	\$47	\$6.11
Building Occupants			
Initial Completes	0.05 hours	\$78	\$3.90
Full Completes	0.13 hours	\$78	\$10.14

*Note that the respondent burden for a full complete includes the time to answer the screening question.

(ii) Estimating Capital and Operations and Maintenance Costs

⁵ The percent of employee compensation that accounts for salaries and wages is based on civilian works, which includes private industry workers, as well as state and local government workers. This information is available at: <http://www.bls.gov/news.release/pdf/ecec.pdf> (released March 12, 2013).

EPA does not expect respondents to incur any capital or operations and maintenance (O&M) costs. This information collection is voluntary and does not require special equipment.

(iii) Capital/Start-up Operating and Maintenance (O&M) Costs

Not applicable.

(iv) Annualizing Capital Costs

Not applicable.

6(c) Estimating Agency Burden and Costs

EPA will use in-house staff and contractors to conduct the survey. EPA staff will oversee the contractor staff working on the survey, and send out the pre-notification letters to potential respondents. It is estimated that administering the survey will require 1/7th of a full-time employee (FTE) at EPA headquarters. The cost for EPA staff is estimated to be \$77.62 per hour, based on the 2012 wage rate for a GS-13, Step 5 employee in the Washington-Baltimore locality, with a government overhead factor of 1.6 to account for fringe benefits and overhead. This is equivalent to an EPA staff cost of approximately \$23,064. EPA’s cost for sending the pre-notification letters will be \$112,000, the cost of sending 66,000 pre-notification letters costing \$1.69 each (\$0.49 in postage and \$1.20 in materials and processing cost).

EPA will incur costs for contractor staff to administer the telephone survey, process and analyze the data, and prepare survey documentation.

Table 6.4 presents the Agency costs for each activity associated with conducting the survey. Total Agency costs are estimated at \$710,000.

Activity	Agency Cost
EPA Staff Time	\$23,000
Pre-Notification Letters	\$112,000
CATI and Web Programming	\$20,000
Sampling	\$22,000
Interviewing and Web Data Collection	\$466,000
Data Cleaning and Processing	\$31,000
Weighting	\$23,000
Incentives	\$13,000
Total Cost	\$710,000

6(d) Estimating the Respondent Universe and Total Burden Costs

See section 2(b) of Part B of this supporting statement for a description of how the necessary sample sizes (i.e., respondent universe) were estimated. The per-respondent burden and cost are described above. Table 6.5 presents the respondent universe and the total hour and cost burden by respondent type.

Respondent Type*	Estimated Respondent Universe*	Estimated Universe of Small	Per-Respondent Burden*	Total Respondent Burden	Per-Respondent Cost (2012\$)	Total Respondent Cost (2012\$)
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		Respondents**	(hours)	(hours)		
A. Contractors						
Initial Completes	1,391	1,349	0.05	70	\$2.35	\$3,269
Full Completes	254	246	0.55	140	\$25.85	\$6,566
B. Lessors and Property Managers						
Initial Completes	1,972	1,913	0.05	99	\$2.35	\$4,634
Full Completes	68	66	0.13	9	\$6.11	\$415
C. Building Occupants						
Initial Completes	4,720	4,578	0.05	236	\$3.90	\$18,408
Full Completes	80	78	0.13	10	\$10.14	\$811
Summary for All Respondents						
Initial Completes	8,083	7,840	0.0501	405	\$3.26	\$26,311
Full Completes	402	390	0.3955	159	\$19.38	\$7,792
All Completes	8,485	8,231	0.0665	564	\$4.02	\$34,103

*Note that the respondent burden for a full complete includes the time to answer the screening questions.

**Note that larger firms (who are expected perform disproportionately more RRP activities) will be oversampled. While over 99% of the entities in these industries are small, roughly 97% of survey respondents are expected to be small entities.

6(e) Bottom Line Burden Hours and Cost Tables

Table 6.6 details the total bottom-line burden (respondent and EPA) associated with this ICR. Tables 6.1 through 6.5 detail how these total figures were derived.

Cost Category	Labor Hours	Cost
Respondent Labor	564	\$34,103
EPA Labor	N.A.	\$23,000
Other Direct EPA Costs	N.A.	\$687,000
Total	564	\$744,103

6(f) Reasons for Change in Burden

Not applicable because this request does not renew or modify an existing ICR.

6(g) Burden Statement

The annual public burden for this collection of information is estimated to average 0.07 hours per response. This includes an average respondent burden of 0.05 hours for respondents that are not eligible to complete the full study (initial completes) and 0.40 hours for respondents who complete the full study (full completes). Burden is defined in 5 CFR 1320.3(b). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2013-0715, which is available for online viewing at www.regulations.gov, or in-person viewing at the Pollution Prevention and Toxics Docket in the EPA Docket Center (EPA/DC). The EPA/DC Public Reading Room is located in the William Jefferson Clinton (WJC) West Building, Room 3334, 1301 Constitution Ave., N.W., Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the EPA/DC Public Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280.

You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques. Submit your comments, referencing Docket ID No. EPA-HQ-OPPT-2013-0715 and OMB Control No. 2070-NEW, to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Pollution Prevention and Toxics Docket, Environmental Protection Agency Docket Center (EPA/DC), Mailcode: 28221T, 1200 Pennsylvania Ave., N.W., Washington, DC 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, DC 20503.

ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachment 1 - Toxic Substances Control Act Section 402; 15 U.S.C. 2681 et. seq.

Attachment 2 - Public Consultations

Attachment 3 - Public Comments on Proposed ICR and EPA Responses to Public Comments

Attachment 4 - EPA Public and Commercial Building Contractor Survey Questionnaire

Attachment 5 - EPA Public and Commercial Building Manager/Lessor Survey Questionnaire

Attachment 6 - EPA Public and Commercial Building Occupant Survey Questionnaire