

**ATTACHMENT 2**  
Public Consultations



## Consultation Request for December 2013 Federal Register Notice

Date: December 12, 2013  
From: US EPA  
To: [Addressees as selected]  
Subject: Consultation for Public and Commercial Building Survey ICR

EPA's Office of Pollution Prevention and Toxics has initiated a proceeding to investigate whether and what type of regulatory action might be appropriate to control exposures to lead resulting from renovation, repair and painting activities in public and commercial buildings. On December 6, the U.S. Environmental Protection Agency (EPA) published a Notice in the Federal Register (78 FR 73520) titled "Agency Information Collection Activities; Proposed Collection; Comment Request." The Notice refers to EPA's intention to request Office of Management and Budget (OMB) clearance for an Information Collection Request (ICR) related to reporting and recordkeeping requirements for a survey of construction contractors, property managers and lessors, and building occupants about renovation, repair, and painting activities in public and commercial buildings.

The Notice and the draft ICR are attached. You can also access the Federal Register Notice, the ICR supporting document, and any public comments received to date by searching on docket ID number EPA-HQ-OPPT-2013-0715 at [www.regulations.gov](http://www.regulations.gov), or using the link <http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPPT-2013-0715>

In addition to public notice and comment requirement initiated by the Notice, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with members of the public about specific aspects of an ICR before submitting it to OMB for review and approval.

As part of this required consultation, EPA is contacting you to solicit your input. Note that if you take this opportunity to provide input, your name, affiliation, e-mail address, phone number and any information you provide (e.g., copies of e-mails) will be incorporated and attached to the ICR supporting statement, which will be a public document. In addition, the OMB Desk Examiner for the ICR in question may contact you to verify the accuracy of any comments EPA identifies in the ICR. EPA solicits your input on the following questions:

- Are there other questions that EPA should ask in order to understand the baseline incidence of different types of renovation, repair, and painting activities that disturb lead-based paint in public and commercial buildings, 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?
- Is it clear what information the questions are asking respondents for? Are there any suggestions for rewording the questions or providing clarifying instructions?
- How accurate are EPA's assumptions in the ICR, such as the percentage of respondents that will

perform renovation, repair, and painting activities in public and commercial buildings; the average number of jobs per year they perform; and the average number of employees engaged in these activities?

- Do you agree with EPA's estimates of the burden and cost of responding to the survey? Are the Bureau of Labor Statistics (BLS) labor rates accurate? If you have any reason to consider the BLS labor rates as used by EPA inaccurate or inappropriate, explain your rationale.

Your timely response will be greatly appreciated. If you have any comments in response to the above questions, or with respect to any other part of the information collection, please respond by return e-mail to [silagi.william@epa.gov](mailto:silagi.william@epa.gov) or via <http://www.regulations.gov> by February 4, 2014. EPA will consider your comments, as well as any other public comment received in response to the Federal Register Notice identified above, in preparing a final document for OMB review.

Sincerely,  
William Silagi  
Economic and Policy Analysis Branch  
U.S. EPA Office of Pollution Prevention and Toxics