

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

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection**

**TITLE: Lead; Clearance and Clearance Testing Requirements for the Renovation, Repair, and Painting Program**

**EPA ICR No. 2381.03      OMB Control No. 2070-0181**

**1(b) Short Characterization/Abstract**

This information collection request (ICR) is a renewal of a currently approved ICR under the Paperwork Reduction Act (PRA)<sup>1</sup> that is scheduled to expire on April 30, 2015. Before submitting the ICR to the Office of Management Budget (OMB) for review and approval under the PRA, EPA must solicit public comments on the ICR and estimated burden pursuant to PRA section 3506(c)(2)(A) and 5 CFR 1320.8(d)(1).

Please note that this ICR is EXACTLY the same as the ICR that is currently approved, except for information at 3(b) and 3(c) below. The Agency has not made any changes to the ICR because there is a separate parallel effort to consolidate the information collection activities and burden covered by this ICR with other related information collection activities and burden covered by two other ICRs. EPA is also working with OMB to review the format and presentations in the ICR. Given those efforts, this ICR renewal document will only be used to extend the existing approval to allow for the consolidated ICR to complete the PRA public review process prior to submission to OMB for review and approval under the PRA.

This information collection request (ICR) covers revisions to the 2008 Renovation, Repair, and Painting (RRP) rule that established reporting and recordkeeping requirements for individuals and firms conducting renovations in target housing, which is most housing constructed before 1978, and child-occupied facilities, which are pre-1978 residential, public, or commercial buildings where children under six are regularly present. EPA revised the RRP rule under the authority of sections 402, 404 and 407 of the Toxic Substances Control Act (TSCA). This rule-related Information Collection Request (ICR) addresses the incremental paperwork activities related to amendments to the 2008 RRP rule and describes and analyzes the changes that will ultimately be incorporated into the ICR that is currently approved under OMB Control No. 2070-0155 (EPA ICR No. 1715, *TSCA Section 402 and Section 404 Training and Certification, Accreditation and Standards for Lead-Based Paint Activities*).

Section 402(a) of TSCA requires EPA to develop and administer a training and certification program as well as work practice standards for persons who perform lead-based paint activities. The current regulations in 40 CFR part 745, subpart L, cover inspections, lead

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<sup>1</sup> [44 USC 3501 et seq.](#)

hazard screens, risk assessments, and abatement activities in target housing, which is most pre-1978 housing, and child-occupied facilities.

Like the regulations under section 402(a) of TSCA, the regulations pertaining to renovation projects under section 402(c)(3) of TSCA require reporting and/or recordkeeping from three entities: firms engaged in renovations in target housing and child-occupied facilities; training providers; and states/Territories/Tribes/Alaskan Native Villages (hereafter, the term “states” includes Territories, Tribes and Villages). The following sections provide a general overview of the reporting and recordkeeping requirements for firms, states, and training providers.

**Firms.** Firms that wish to engage in renovations in target housing or child-occupied facilities must obtain certification from EPA/states. This includes firms consisting only of one self-employed individual. To receive certification, a firm must submit a letter to EPA/states certifying that it will employ certified renovators and conduct renovations in target housing in accordance with the work practice standards. Firms must re-certify every five years. The rule also requires firms to develop and retain records of the renovation activities they undertake to demonstrate compliance with standards and provide a written record for future reference. In addition, for renovations in child-occupied facilities located in public or commercial buildings, the rule requires firms to provide the building owner and adult representative of the child-occupied facility with a lead hazard information pamphlet. After providing the pamphlet to the owner and occupant and obtaining written acknowledgment, the firm must keep acknowledgment records on file for three years after completion of work. Renovation firms must also either (i) provide the lead hazard information pamphlet and general information on the renovation to parents or guardians of children under age six using the facility, or (ii) erect signs that provide general information on the renovation accompanied by the pamphlet or information on how to obtain a copy of it. (Existing regulations require the distribution of a lead hazard information pamphlet, and the associated recordkeeping, before renovations in all target housing. This burden is reflected in EPA ICR No. 1669, *Lead-Based Paint Pre-Renovation Information Dissemination – TSCA Sec. 406(b)*, and is approved under OMB Control No. 2070-0158.) The final rule modifies some of the mandatory work practices for firms, but does not impose any additional reporting or recordkeeping requirements on firms.

**States.** Under TSCA section 404, EPA must review and assess state submissions to determine whether to grant authorization to administer a program addressing training, certification, accreditation and standards for LBP activities. A state seeking authorization will need to provide information to EPA so the Agency may determine whether its program is at least as protective of human health and the environment as the federal program and whether it provides adequate enforcement. Authorized states need to provide a report to EPA on their activities. The final rule modifies the minimum elements required for state programs in order to demonstrate that they are at least as protective as the federal program. The final rule does not impose additional reporting or recordkeeping requirements on states.

**Training providers.** Training programs seeking to offer training for renovators or dust sampling technicians must obtain EPA/state accreditation. In order for EPA/states to have the information necessary to evaluate and accredit the training programs, training providers must prepare and submit application packages. Once accredited, if there are any changes in the information submitted on the application, the training provider must submit an amendment to the EPA or the state, as applicable. Training programs also must maintain certain records related to their students and the qualifications of their training personnel. Training programs are required to notify the Agency 1) prior to providing training courses, and 2) following completion of training courses. Training programs must apply for re-accreditation every four years. These notification requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections. The final rule makes several minor modifications to the accreditation application package requirements and the notification requirements.

This rulemaking related ICR Addendum will eventually merge with the existing ICR that covers the information collection activities associated with the reporting and recordkeeping requirements for individuals or firms conducting lead-based paint activities or renovation in or on houses, apartments, or child-occupied facilities built before 1978, under the authority of sections 402 and 404 of the Toxic Substances Control Act (TSCA) (15 U.S.C. 2682, 2684). That existing ICR is entitled: “TSCA Section 402 and Section 404 Training and Certification, Accreditation and Standards for Lead-Based Paint Activities” and identified by EPA ICR No. 1715, and OMB Control No. 2070-0155.

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need/Authority for the Collection**

Under section 402(a)(1) of TSCA, the Agency must “...promulgate final regulations governing lead-based paint activities to ensure that individuals engaged in such activities are properly trained; that training programs are accredited; and that contractors engaged in such activities are certified. Such regulations shall contain standards for performing lead-based paint activities, taking into account reliability, effectiveness and safety.”

Section 402(a)(2) states that “Final regulations promulgated under [section 402(a)] paragraph (1) shall contain specific requirements for the accreditation of ... training programs ... including, but not limited to:

- Minimum requirements for the accreditation of training providers;
- Minimum training curricula requirements;
- Minimum training hour requirements;
- Minimum hands-on training requirements;
- Minimum training competency and proficiency requirements;
- Minimum requirements for training program quality.”

Section 402(c)(3) directs EPA to revise its regulations under TSCA section 402(a) to apply to renovation and remodeling activities that create lead-based paint hazards.

Section 404(a) of TSCA states that “[a]ny State which seeks to administer and enforce the standards, regulations, or other requirements established under section 402 may...develop and submit to the Administrator an application, in such form as the Administrator shall require, for authorization of such a State program.” The Agency shall approve such an application, if it finds that “...the State program is at least as protective of human health and the environment as the Federal program under section 402...and such State program provides adequate enforcement.”

Section 407 of TSCA states that regulations issued under Title IV of TSCA shall include such recordkeeping and reporting requirements as may be necessary to ensure effective implementation.

The Agency’s amendments to the regulations issued under sections 402(a), 402(c)(3), 404(a), and 407 fulfill these statutory mandates.

## **2(b) Practical Utility/Users of the Data**

### Owners and Occupants of Target Housing and Child-occupied Facilities

The RRP rule already requires firms to provide a renovation-specific lead hazard information pamphlet to owners and occupants of target housing and child-occupied facilities before renovations commence. The RRP rule also requires owners and occupants to be provided with a copy of the recordkeeping checklist that firms complete to demonstrate compliance with the RRP rule. This final rule does not make any changes to the information required to be provided to the owners and occupants.

### EPA

This information collection will provide EPA with the materials necessary to authorize state renovation, repair, and painting programs, as TSCA Title IV directs, and to serve as the accrediting and certifying body in states without authorized programs.

### EPA/States

The underlying collection enables EPA/states to determine compliance with and enforce the requirements for renovation-specific training, certification, accreditation, and work practice standards. Without this collection, there would be no meaningful way of ensuring the implementation of the statutory objective: to ensure that trained individuals conduct renovations in such a way as to minimize potential harm to occupants.

It is the nature of certification and accreditation that an entity seeking such must provide materials to the certifying or accrediting body. The materials the Agency/state requires for these activities are central to the activity. In addition, EPA relies on training provider notifications to keep track of which individuals have received accredited renovator training. This information is a critical part of EPA’s compliance monitoring and enforcement activities. The final rule makes

several minor modifications to the training provider accreditation application package requirements and the training provider notification requirements. These modifications will improve the ability of EPA and the states to administer training accreditation programs.

The records renovation firms have to compile and retain are necessary as a reference for building owners/occupants and EPA/states. They demonstrate that individuals conducting the activities do so in a safe and effective manner, according to the minimum work practice standards established by the rule. These recordkeeping requirements are also necessary to permit the EPA/states to target enforcement activities and to ensure compliance within the contracting and training community.

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

#### **3(a) Non-Duplication**

The Agency's collection pursuant to the TSCA 402/404/406/407 regulations does not duplicate any other collection. There is no other model program for lead-based paint activities and renovations, or associated state program approval process, and there are currently no other federal requirements for the training and certification of individuals engaged in these activities, for the accreditation of training programs, required standards for the conduct of these activities, or lead hazard information distribution requirements for renovations in child-occupied facilities.

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

In proposing to renew this ICR, EPA provided a 60-day public notice and comment period that ended on February 27, 2015 (79 FR 78084, December 29, 2014). EPA received no comments during the comment period.

#### **3(c) Consultations**

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 original or renewal ICR to OMB for review and approval. In accordance with this regulation, EPA pursued additional consultations with interested parties during the development of the renewal of this collection. Specifically, EPA contacted the following nine individuals:

Kary S. Amin  
NOVA Environmental, Inc.  
734-930-0995  
[kamin@nova-env.com](mailto:kamin@nova-env.com)

Thomas Nunziata  
Laborers' International Union of North America  
860-974-0800  
[TNunziata@laborers-AGC.org](mailto:TNunziata@laborers-AGC.org)

Mike Nagel  
Men at Work Chicago  
312-751-1500  
[mike@mawchicago.com](mailto:mike@mawchicago.com)

Steve Heiteen  
Portland Remodel  
503-244-3525  
[steve@portlandremodel.com](mailto:steve@portlandremodel.com)

Kevin Gaul  
Pella Corporation  
641-621-6615  
[gaulkj@pella.com](mailto:gaulkj@pella.com)

Vince Butler  
BBC Builders  
703-878-3300  
[vbutler@bbcbuilders.com](mailto:vbutler@bbcbuilders.com)

Bob Hanbury  
House of Hanbury Builders, Inc.  
860-666-1537  
[bobh@houseofhanbury.com](mailto:bobh@houseofhanbury.com)

Mark Mikkelson  
Andersen Windows  
651-264-5150  
[Mark.Mikkelson@AndersenCorp.com](mailto:Mark.Mikkelson@AndersenCorp.com)

Andrew J. McLellan  
Environmental Education Associated  
888-436-8338  
[ajm@environmentaleducation.com](mailto:ajm@environmentaleducation.com)

EPA received no responses to its solicitation for consultations. A copy of EPA's consultation e-mail to the above potential respondents is included in Attachment 3.

### **3(d) Effects of Less Frequent Collection**

Due to the nature of this regulation and its collection, less frequent collection is not feasible. In particular, each firm must obtain certification and re-certification, each training program must obtain accreditation and re-accreditation, and provide specific notification and documentation prior to commencement and upon completion of each course, and each renovation activity is a separate and unique event requiring specific documentation. Program approval for states is a one-time activity, although there is ongoing reporting.

### **3(e) General Guidelines**

This ICR is consistent with OMB's general guidelines. Firms are required to maintain records for three years and training providers to maintain records for three and one-half years. authorized states must report once a year for the first three years, and biannually thereafter. The final rule requires training providers to maintain records of renovation and dust sampling technician training courses for five years, because five years is the length of the refresher training cycle for certified renovators and dust sampling technicians.

### **3(f) Confidentiality**

Neither the existing regulations nor the final rule amendments address questions of a confidential nature.

### **3(g) Sensitive Questions**

Neither the existing regulations nor the final rule amendments address questions of a sensitive nature.

#### **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

##### **4(a) Respondents/NAICS Codes**

Respondents for the reporting, third-party notification and recordkeeping requirements of the RRP rule include: 1) firms and individuals engaged in residential renovations, 2) firms and individuals engaged in renovations in child-occupied facilities, and 3) training programs providing training services in lead-based paint activities and renovations. This final rule affects only the reporting and recordkeeping obligations of training programs.

The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the paperwork requirements covered in the existing ICR and this proposed addendum are described below:

236118	Residential Remodelers
238210	Electrical Contractors
238220	Plumbing, Heating, and Air-Conditioning Contractors
238320	Painting and Wall Covering Contractors
238350	Finish Carpentry Contractors
238310	Drywall and Insulation Contractors
238170	Siding Contractors
238340	Tile and Terrazzo Contractors
238150	Glass and Glazing Contractors
238390	Other Building Finishing Contractors
238290	Other Building Equipment Contractors
531110	Lessors of Residential Buildings and Dwellings
531311	Residential Property Managers
541330	Engineering Services
541350	Building Inspection Services
611110	Elementary and Secondary Schools
611519	Other Technical and Trade Schools
624410	Child Day Care Services

##### **4(b) Information Requested**

The existing renovation regulations specify reporting and record keeping for training providers and individuals/firms undertaking renovation activities. The final rule makes minor changes in the reporting and recordkeeping obligations of training providers.

###### **(i) Data Items**

###### Training Providers

To gain accreditation, training providers must submit the following documents to EPA/State, using either the sample EPA Form 8500-25, entitled “Accreditation Application for Training Programs” or a similar form containing the required information:

- An accreditation statement that clearly indicates how the training program meets the minimum requirements for accreditation, and
- A quality control plan, which outlines procedures for periodic revision of training materials and exams, annual review of instructors, and adequacy of the training facilities.

This final rule would require training providers to include documentation of training manager and principal instructor qualifications with their accreditation applications. In addition, if training providers wish to use course materials approved by authorized state programs, the providers must submit copies of the course materials along with their applications.

On occasion, training providers may later amend their accreditation application to add or modify information. The final rule requires training providers to amend their accreditation applications within 90 days of the date that information submitted in the most recent application changes. If the change involves a new training manager or principal instructor, the training provider must wait 30 days before presenting courses, unless the new training manager or principal instructor was previously identified in an application for accreditation that EPA subsequently approved. Training providers may provide training at new permanent training locations on an interim basis as soon as they submit an amendment. They may continue to provide training at the new permanent training location if EPA approves the amendment or if EPA does not disapprove the amendment within 30 days. Accredited training providers must apply for re-accreditation every four years.

For renovator and dust sampling technician courses, the training course provider must take a digital photograph of each trainee and submit it to EPA along with its training course follow-up information. The final rule requires the photograph to be an accurate and recognizable image of the trainee and at least one square inch in size as it is reproduced on the student's course completion certificate.

In addition, the final rule requires providers of e-learning courses to maintain records on each student's course log-ins, launches, progress, and completion.

#### Firms

The final rule does not modify firm reporting or recordkeeping requirements.

#### States

While the final rule modifies the elements that state programs must have to obtain authorization, it does not modify authorized state reporting or recordkeeping requirements.



## **(ii) Respondent Activities**

The final rule makes minor changes to the accreditation application and amendment requirements, and extends the recordkeeping requirements for records associated with renovator or dust sampling technician courses from 3 years and 6 months to 5 years. Training providers will continue to perform the following activities:

- read the regulation;
- prepare and submit an accreditation application to accrediting entity;
- amend accreditation application as needed;
- submit an initial and, if needed, amended notification of courses to be given;
- provide notice of completion of all courses offered;
- retain records; and
- provide accrediting entity access to records as requested.

## **5. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

EPA will perform the following activities in response to the submittals required by this final rule:

- Receive, review, and act on applications for accreditation and amended applications from training providers.

### **5(b) Collection Methodology and Management**

For purposes of this existing collection and this final rule, the Agency will make use of existing technology to simplify the application and notification process where possible. In addition to the more traditional methods (mail, commercial delivery service, or hand delivery), the Agency accepts fax and e-mail course notifications from training providers as well as notifications through the Central Data Exchange (CDX). E-mail notification must be followed by a written notification for the record, but the original e-mail notice would satisfy the applicable notification time requirements.

### **5(c) Small Entity Flexibility**

While the majority of the entities affected by this final rule are small, the recordkeeping and reporting requirements of this final rule impose minimal additional burden on the estimated 159 small business training providers affected. In addition, as part of the development process for the 2008 RRP rule, the Agency convened a Small Business Advocacy Review Panel under the Regulatory Flexibility Act. More information on the Panel, and the Agency's assessment of the impacts on small businesses, can be found in the preamble to the 2008 RRP rule.

#### **5(d) Collection Schedule**

For certification, accreditation, and authorization, collection activities will occur according to the following schedule:

- Training programs may apply for accreditation at any time;
- Training programs must amend their applications when information changes, and this final rule establishes requirements for amending applications;
- Training programs must seek re-accreditation at four-year intervals following initial accreditation;
- Training programs submit notification of training to EPA before each course;
- Training programs submit post-training notification to EPA after each course;
- Firms may apply for certification at any time;
- Firms must amend their applications when information changes;
- Firms must seek re-certification at five-year intervals following initial certification;
- Renovators and dust sampling technicians may take training at any time;
- Renovators and dust sampling technicians must take refresher training at five-year intervals following initial training;
- States may apply for authorization at any time;
- Authorized states must report once a year for the first three years, and biannually thereafter.

#### **6. ESTIMATING THE BURDEN AND COST**

This section estimates the incremental burden of reporting and recordkeeping for the revisions to the 2008 Lead Renovation, Repair, and Painting Program final rule, also known as the RRP or LRRP rule. This burden is incremental to the burden already accounted for in the existing, approved ICR (EPA ICR No. 1715.12). The estimates of the number of entities subject to the rule's requirements and the unit burden and cost of the requirements were taken from the ICR supporting statement *Final Rule Addendum to an Existing EPA ICR Entitled: TSCA Sections 402/404 Training and Certification, Accreditation, and Standards for Lead-Based Paint Activities* (EPA ICR No. 1715.10, OMB 2070-0155), the *Economic Analysis for the TSCA Lead Renovation, Repair and Painting Program, Final Rule for Target Housing and Child-Occupied Facilities*, also referred to as the Economic Analysis for the Final Rule, and from the *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Opt-out and Recordkeeping Final Rule for Target Housing and Child-Occupied Facilities*, also referred to as the Economic Analysis for the Opt-Out rule. This supporting statement provides burden and cost estimates for the first three years of the program. All costs are presented in year 2008 dollars.

This final rule includes the following changes to the LRRP program: (1) a requirement for training providers to submit documentation of training manager and principal instructor qualifications to EPA along with their applications for accreditation; (2) a requirement for training providers to maintain records of renovator and dust sampling technician courses for 5 years.

Sections 6(a) and 6(b) estimate the respondents' paperwork burdens and costs, respectively. Section 6(c) estimates EPA costs, section 6(d) summarizes the bottom line burden and costs, section 6(e) describes the reasons for changes in burden from the ICR approved under OMB Control No. 2070-0155, and section 6(f) presents the burden statement.

### **6(a) Estimating Respondent Burden**

One type of respondent will be affected by this information collection request: training providers. The notification reporting estimates include the time associated with photocopying training manager and principal instructor qualifications. The recordkeeping burden estimates include the time required for the respondent to file a record of the information.

The economic analysis for the Opt-Out and Recordkeeping Final Rule, a 2010 amendment to the 2008 RRP rule, estimates that 170 training providers will be accredited to provide renovator training (EPA 2010). As described in section 2.9.1 of the economic analysis for the final 2008 RRP rule, 94 percent of firms in the Other Technical and Trade Schools industry category are small businesses (EPA 2008). Therefore, it is assumed that 94 percent of the 170 training providers, or 159, are small.

Training providers are already required to obtain and retain documentation of the qualifications of their training managers and principal instructors. This final rule merely requires copies to be sent to EPA along with applications for accreditation or re-accreditation. EPA estimates that these materials will consist of a one-page resume and, possibly, a copy of a diploma, course completion certificate, or transcript. For a training provider with one training manager and one principal instructor, this will mean an additional 2-4 photocopies per application. In the draft Information Collection Request Supporting Statement accompanying the proposed rule, EPA estimated that each photocopy costs \$0.09 (EPA 2010). Four photocopies would thereby result in a total cost of \$0.36 per accreditation re-accreditation application. An application for re-accreditation must be submitted every 4 years in order to maintain accreditation.

With respect to recordkeeping, training providers are required to keep records associated with training courses for 3 years and 6 months. The final rule extends this period to 5 years for renovator and dust sampling technician courses. The economic analysis for the final rule estimated that a total of 170 training providers would become accredited for renovator training, and 56 renovator courses per training provider would be needed to train the renovators required for the first year that the RRP rule was effective. EPA's economic analysis for the Opt-Out and Recordkeeping Final Rule estimated that no new training providers would become accredited, and a total of 30 additional renovator courses per existing training provider would be needed to train the additional renovators required during the first year after the Opt-Out and Recordkeeping Final Rule took effect. According to these analyses, a total of 20 renovator courses would be needed per training provider during subsequent years. These analyses also estimated that 1 page of records would be kept for each notification provided, including pre-course notifications, re-notifications, and post-course notifications. Each course would require a pre-notification before the course began, giving general information on the training provider and the time and place for the course, and a post-notification after the course, which would include general information on the provider and information on successful trainees and their photographs. EPA estimated that 12

percent of courses would also require a re-notification due to changes in date, time, or location. Thus, during the first year, 86 courses would have been provided by each training provider, resulting in 182 notifications that would have to be kept for an additional 2 years, approximately, depending upon when the course was actually given. Additional years would add 20 courses per year per training provider, resulting in 42 notifications that would have to be kept for an additional 18 months. In its economic analysis for the Opt-Out and Recordkeeping Final Rule, EPA estimated the recordkeeping costs per notification would total \$0.24. Pro-rating this amount for 5 years, by subtracting out the \$0.09 cost of the photocopy, dividing the remainder by 3 and multiplying by 5, results in an estimated recordkeeping cost of \$0.34 per notification. Thus, recordkeeping costs for the 86 courses given per training provider in the first year would total \$61.88 instead of \$43.68. The recordkeeping costs for the 20 courses given per training provider in subsequent years would total \$6.80 instead of \$4.80. These estimates cover the entire 5 year period during which the records would have to be kept.

### **6(b) Estimating Respondent Costs**

The cost estimates addressed in this section are based on the burden estimates discussed in section 6(a). Wage rates for each category of personnel are based on wage rate information from the Bureau of Labor Statistics (BLS)<sup>2</sup>. Following are the wage rates used in this analysis, which are fully loaded (i.e., include fringe benefits and overhead), and are in 2008 US dollars:

Training Provider Clerical Time      \$25.56/hour

The loaded wage rate for training provider clerical staff is \$25.56 per hour. It is assumed that clerical staff will obtain photocopies of training manager and principal instructor qualifications and perform recordkeeping activities. The Economic Analysis for the Proposed Rule estimates that the recordkeeping hours per event is 0.01.

### **6(c) Estimating Agency Cost**

This final rule does not affect government costs to administer the program.

### **6(d) Bottom Line Burden Hours and Cost**

There are an estimated 170 training provider respondents for this final rule. There are an estimated 182 recordkeeping responses and 1 estimated accreditation response per training provider during the first year for a total of 31,110 responses. In each of the next four years, there will be an estimated 42 recordkeeping responses and no estimated accreditation responses per training provider, for a total of 7,140 responses per year. The total burden per respondent is presented in Exhibit 6.1. The total annual burden hour increase is estimated to be 309.4 hours in the first year and 71.4 hours in each of the next four years. This final rule is not expected to have any impact on Agency costs to administer the program. Therefore, the average annual number of responses per training provider is estimated to be about 89, the average annual number of responses is estimated to be about 15,130, and the average annual recordkeeping burden is estimated to be about 151 hours.

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<sup>2</sup>U.S. Bureau of Labor Statistics. 2008. Occupational Employment Statistics Series.

### Exhibit 6.1 Total Training Provider Costs - 2008 Dollars

	Year 1	Year 2	Year 3	Year 4	Year 5	Average
Accreditation Cost	\$61	0	0	0	0	\$20
Recordkeeping Cost (0.01 hours)	\$18	\$2	\$2	\$2	\$2	\$7
Total Cost	\$79	\$2	\$2	\$2	\$2	\$27

**Note(s):** Numbers may not calculate due to rounding.

**Sources:** Economic Analysis for the Opt-Out and Recordkeeping Final Rule; Economic Analysis for the Final RRP Rule; EPA ICR No. 1715.07; and U.S. Bureau of Labor Statistics Occupational Employment Statistics Series (2008).

#### 6(e) Reasons For Changes in Burden

The burden analyzed in this ICR addendum relates directly to the amended paperwork requirements contained in the final rule and results in a program change increase.

##### *Program Changes*

The burden increase analyzed in this ICR is attributable to program changes related to the revisions to the 2008 final RRP rule. These changes would increase the burden associated with, but not the number of events for, certain approved information collection activities, namely training provider applications for accreditation and training provider recordkeeping.

#### 6(f) Burden Statement

The incremental public burden for this amendment to an existing collection of information that is approved under OMB Control No. 2070-0155 is estimated to average approximately 0.9 hours per year for training providers. According to the Paperwork Reduction Act, “burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. 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 in title 40 of the CFR, after appearing in the Federal Register, 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-2014-0486, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center 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 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-2014-0486 and OMB Control No. 2070-0155, to (1) EPA online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), or by mail to: EPA Docket Center, Environmental Protection Agency, Mail Code: 28221T, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460, and (2) OMB by email to: [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov).

## ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement for this rule-related ICR addendum are available in the public docket established for the rulemaking under docket identification number EPA-HQ-OPPT-2005-0049. These attachments are available for online viewing at [www.regulations.gov](http://www.regulations.gov) or otherwise accessed as described in section 6(f) of the supporting statement.

Attachment 1	Toxic Substances Control Act (TSCA), Sections 402 and 404 (15 USC 2682, 2684)
Attachment 2	Final Rule: Lead; Clearance and Clearance Testing Requirements for the Renovation, Repair, and Painting Program (RIN 2070-AJ57)
Attachment 3	Record of Consultations with Potential ICR Respondents