

Filename: 59954302

**Supporting Statement for an Information Collection Request (ICR)
Under the Paperwork Reduction Act (PRA)**

Table of Contents

| | |
|--|----|
| 1. EXECUTIVE SUMMARY..... | 3 |
| 1(a). Identification of the Information Collection – Title and Numbers..... | 3 |
| 1(b). Docket Information..... | 3 |
| 1(c). ICR Status..... | 3 |
| 1(d). Abstract..... | 4 |
| 2. NECESSITY OF THE INFORMATION COLLECTION..... | 5 |
| 2(a). Related Legal and/or Administrative Requirements..... | 5 |
| 2(b). Necessity of the Information Collection..... | 8 |
| 2(c). Uses, Users, and Purpose of the Information Collection..... | 8 |
| 3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA.... | 9 |
| 3(a). Non-Duplication..... | 9 |
| 3(b). Consultations and Public Comments..... | 10 |
| 3(c). Effects of Less Frequent Collection..... | 10 |
| 3(d). Small Entity Flexibility..... | 11 |
| 3(e). General PRA Related Guidelines..... | 11 |
| 3(f). Confidentiality..... | 11 |
| 3(g). Sensitive Questions..... | 12 |
| 4. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT..... | 12 |
| 4(a). Agency Activities..... | 12 |
| 4(b). Estimated Agency Costs..... | 12 |
| EPA estimates that it costs the EPA approximately \$3,590,392 to carry out the activities associated with the information collection activities covered by this ICR. This ICR renewal includes a cost estimate for the administration of the LBP and RRP programs by the EPA. The per-activity burdens are taken from those derived in EPA’s (2009) Economic Analysis for the TSCA Section 402 Lead-Based Paint Program Accreditation and Certification Fee Rule. The numbers of events are estimated for each respondent type, and following the methodology of previously approved ICRs (EPA ICR No. 1715.10)..... | 12 |
| 4(b)(i). Collection Schedule..... | 13 |
| 4(b)(ii). Use of Technology to Facilitate Collection Activities..... | 14 |
| 5. The RESPONDENTS AND INFORMATION COLLECTION (IC) ACTIVITIES..... | 14 |

5(a). Methodology for Estimating Respondent Burden and Costs.....14

5(b).....15

IC #1: LBP training provider accreditation applications, training notifications, and recordkeeping.....15

IC #2: LBP activity firm certification activities.....17

IC #3: Individuals performing LBP abatement activities; certification and accreditation / reporting and recordkeeping Respondents.....18

IC# 4: LBP activity firm pre-abatement reports and occupant protection plans, abatement activity notifications, post-abatement reports and recordkeeping.....19

IC# 5: RRP training provider accreditation applications, training notifications, and recordkeeping.....20

IC# 6: Private RRP firm certification activities.....21

IC# 7: Distribution of pre-renovation lead hazard information pamphlet and post-renovation checklists documenting lead-safe work practices.....23

IC# 8: Government-employed RRP professional certification activities, distribution of lead hazard information pamphlet prior to renovation activities, post-renovation checklists documenting lead-safe work practices, and recordkeeping.....25

IC# 9: RRP and LBP professionals classroom training time related to recordkeeping compliance.....27

5(c). Total Estimated Respondent Burden and Costs.....29

6. PRA Burden Statement.....29

7. ATTACHMENTS TO THE SUPPORTING STATEMENT.....30

1. EXECUTIVE SUMMARY

1(a). Identification of the Information Collection – Title and Numbers

Title: Lead Training, Certification, Accreditation and Authorization Activities

ICR Numbers: EPA ICR No.: 2507.01; OMB Control No.: 2070-[new].

EPA Form Numbers: EPA Form 8500-25: Application and Instructions for Training Providers Applying for Accreditation of Lead-Based Paint Activity and Renovation Training Programs, EPA Form 8500-27: Application for Firms to Conduct Lead-based Paint Activities or Renovations, EPA Form 747-B-99-002: Application and Instructions for Individuals Applying for Certification to Conduct Lead-Based Paint Activities.

Docket ID Number: EPA-HQ-OPPT-2014-0486.

1(b). Docket Information

The information collection request (ICR) that explains the information collection activities and related burden and cost estimates, as well as other supporting documents related to the ICR, are available in the docket established for this ICR. The docket can be viewed online at <http://www.regulations.gov> or in person at the EPA Docket Center, West William Jefferson Clinton Bldg., Rm. 3334, 1301 Constitution Ave., NW., Washington, DC. The telephone number for the Docket Center is (202) 566-1744. For additional information about EPA's public docket, visit <http://www.epa.gov/dockets>.

1(c). ICR Status

Under the Paperwork Reduction Act (PRA), 44 U.S.C. 3501 et seq., 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 control number issued by the Office of Management and Budget (OMB). The OMB control numbers are displayed either by publication in the Federal Register or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers for certain EPA regulations is consolidated in 40 CFR part 9.

Before submitting an ICR to OMB for review and approval under the PRA, an agency must solicit comments pursuant to PRA §3506(c)(2)(A) and [5 CFR 1320.8\(d\)\(1\)](#). After considering comments received on the draft ICR, the agency must submit the ICR to OMB for review and approval according to the procedures prescribed in [5 CFR 1320.12](#). In announcing the submission of the final ICR to OMB for review and approval, the agency must provide another opportunity for public review and comments on the revised ICR pursuant to 5 CFR 1320.12(c).

This is a new ICR that seeks to consolidate the information collection activities that are currently covered by the following three ICRs that are currently approved by OMB under the separate OMB control numbers identified:

- 1) OMB Control No. 2070-0155; EPA ICR No. 1715.14; entitled “TSCA Sections 402 and Section 404 Training, Certification, Accreditation and Standards for Lead-Based Paint Activities and Renovation, Repair, and Painting”; approved through August 31, 2018.
- 2) OMB Control No. 2070-0158; EPA ICR No. 1669.07; entitled “Lead-Based Paint Pre-Renovation Information Dissemination – TSCA Sec. 406(b)”; approved through August 31, 2018.
- 3) OMB Control No. 2070-0181; EPA ICR No. 2381.03; entitled “ICR for the Final Rule entitled “Lead; Clearance and Clearance Testing Requirements for the Renovation, Repair, and Painting Program”; approved through August 31, 2018.

1(d). Abstract

This consolidated ICR will cover the information collection activities associated with the reporting and recordkeeping requirements for individuals, firms and state and local government entities conducting lead-based paint activities or renovations of target housing and child-occupied facilities; training providers; and states/territories/tribes/Alaskan native villages.

Legal authority: The Toxic Substances Control Act (TSCA), 15 U. S. C. 2601 et seq. In particular, sections 401, 402, 404, and 406; and related implementing regulations in 40 CFR part 745. More details are provided in Unit 2(a) of this Supporting Statement.

Respondents/affected entities: Entities potentially affected by this ICR include persons who are engaged in lead-based paint activities and/or perform renovations of target housing or child-occupied facilities for compensation, dust sampling, or dust testing; or who perform lead-based paint inspections, lead hazard screens, risk assessments or abatements in target housing or child-occupied facilities; or who provide training or operate a training program for individuals who perform any of these activities; or state, territorial or Native American agencies that administer lead-based paint activities and/or renovation programs.

Respondent's obligation to respond: Responses are mandatory under TSCA (see also 40 CFR part 745).

Confidentiality of responses: Respondents may claim all or part of a document submitted to be as confidential. EPA will disclose information that is covered by a claim of confidentiality only to the extent permitted by, and in accordance with, the procedures in TSCA section 14 and 40 CFR part 2.11

Estimated total number of potential respondents: 791,805.

Frequency of response: On occasion.

Estimated total annual burden: 6,463,297 hours. Burden is defined at 5 CFR 1320.3(b).

Estimated total annual costs: \$ 315,179,997, includes no annualized capital investment or maintenance and operational costs.

Changes in the estimates: There is an overall increase of 433,995 hours in the total estimated combined respondent burden that is currently approved by OMB in the three ICRs consolidated in this ICR. The difference between the current burden request and the previously approved requests are due to adjustments in EPA's estimates of the burden. Several adjustments to the estimates were made, including:

- Revisions to the estimated number of respondents based on the number of respondents reporting to EPA for the prior information collection. The 2008 RRP Rule and the 2010 Opt-Rule have been in place for a few years and the ICR estimates use actual certification data instead of having to make broader assumptions about industry behavior and compliance rates; and
- Revisions based on market factors. The housing market and related industries including the housing rental, property management and the building renovation industry have yet to recover fully from the drop in the housing market.
- Adding an additional IC to account for training class time for RRP and LBP Abatement initial and refresher training classes. Travel time to and from the training class is included in these burden estimates.

2. NECESSITY OF THE INFORMATION COLLECTION

2(a). Related Legal and/or Administrative Requirements

The related legal authority is the Toxic Substances Control Act (TSCA), 15 U. S. C. 2601 et seq., with related requirements provided in 40 CFR part 745. The various applicable sections are provided in Attachment 1 and are briefly summarized here along with their implementing regulations, which are provided in Attachment 2.

TSCA section 401 defines target housing as any housing constructed before 1978 except housing for the elderly or disabled or 0-bedroom dwellings.

TSCA section 402(a) and 402(c)(3) require EPA to develop and administer a training and certification program as well as work practice standards for persons who perform lead-based paint activities and/or renovations. The current regulations in 40 CFR part 745, subpart E, cover work practice standards, recordkeeping and reporting requirements, individual and firm certification, and enforcement for renovations done in target housing or child-occupied facilities. The current regulations in 40 CFR part 745, subpart L, cover inspections, lead hazard screens, risk assessments, and abatement activities (referred to as "lead-based paint activities") performed in target housing and child-occupied facilities. The current regulations in 40 CFR part 745, subpart Q, establish the requirements that state or tribal programs must meet for authorization to administer the standards, regulations, or other requirements established under TSCA section 402. (See Attachment 2 for 40 CFR 745, Subparts E, L and Q.)

TSCA section 406(b) requires the EPA to promulgate regulations applicable to all renovations of target housing or child-occupied facilities (COFs) performed for compensation, except as otherwise specified, at 40 CFR part 745, subpart E to provide a lead hazard information

pamphlet (attachment 10) to the owner and occupant of such housing no more than 60-days prior to commencing the renovation.

In addition, the EPA has developed extensive guidance and other materials that are available at <http://www.epa.gov/lead>.

The following provides a general overview for requirements covered in this ICR for each entity:

Firms: Firms that wish to engage in renovations in target housing or child-occupied facilities must obtain certification from the EPA/states. This includes firms consisting only of one self-employed individual. To receive certification, a firm must prepare and submit an application to the EPA/states (see attachment 4). 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, 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/or 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 6 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. The final Clearance rule modified some of the mandatory work practices for firms, but did not impose any additional reporting or recordkeeping requirements on firms.

In addition, under TSCA section 406(b), firms that perform renovations of target housing or child-occupied facilities (COFs) for compensation, except as otherwise specified, at 40 CFR part 745, subpart E, must provide a lead hazard information pamphlet (developed under section 406(a) of TSCA) to the owner and occupant of such housing no more than 60-days prior to commencing the renovation. The firm performing renovations also must prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and to provide the pamphlet (section 745.84(b)(3)). If the scope, locations, or expected starting and ending dates of the planned renovation activities change after the initial notification, the firm performing the renovation must provide further written notification to the owners and occupants providing revised information on the ongoing or planned activities. This subsequent notification must be provided before the firm performing the renovation initiates work beyond that which was described in the original notice (section 745.84(b)(4)). Firms must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with the requirements of 40 CFR part 745, subpart E, for a period of three years following completion of the renovation activities in target housing or COFs.

Individuals: Individuals who wish to perform lead-based paint activities or renovations in target housing or child-occupied facilities must also receive certification from the EPA or state. To obtain certification, an individual must complete an accredited training course and receive a

course completion certificate, pass a third-party certification exam, and meet specific education/experience requirements.

Individuals certified to perform lead-based paint activities must take a refresher course and apply for re-certification every three years (five for individuals who have passed a proficiency test as part of their training) (see attachment 5). Individuals certified to perform renovations must take a refresher course every five years. The rule also requires individuals to develop records of the lead-based paint activities and renovations they undertake to demonstrate compliance with standards and provide a written record for future reference. These notification and recordkeeping requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections.

Training providers: Training programs seeking to offer training for inspectors, risk assessors, project designers, abatement supervisors, abatement workers, renovators or dust sampling technicians must obtain EPA/state accreditation. In order for the EPA or states to have the information necessary to evaluate and accredit the training programs, training providers must prepare and submit application packages (see Attachment 3). Once accredited, if there are any changes in the information submitted on the application, the training provider must submit an amendment to the EPA/states, as applicable. Training programs also must maintain certain records related to their students and the qualifications of their training personnel. Training programs also must maintain certain records related to their students and training personnel qualifications. Training programs are required to notify the EPA (i) prior to providing training courses, and (ii) 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.

States: Under TSCA section 404, EPA must review and assess state submissions to determine whether to grant authorization to administer the lead-based paint activities or renovation, repair, and painting program. A state seeking authorization will need to provide information to EPA so the EPA 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.

Sections 402(a) and 402(c)(3) of TSCA require reporting and/or recordkeeping from states/territories/tribes/Alaskan native villages (in this supporting statement, the term “states” includes territories/tribes/villages).

2(b). Necessity of the Information Collection

The information collection activities covered by this ICR are necessary components of the Lead Program established under the TSCA mandates discussed in section 2(a) of this supporting statement.

The re-certification and re-accreditation requirements for training programs are meant to ensure that training programs incorporate new developments and technologies in their courses

and provide training to individuals. The EPA believes this will ensure that individuals and firms conduct renovations and lead-based paint activities in the safest and most effective manner possible.

The application from states seeking to administer and enforce the standards, regulations, or other requirements established under Section 402 is necessary for the EPA to determine whether "...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." Regulations promulgated under the authority of section 406(b) of TSCA ensure that owners and occupants of target housing are provided information concerning potential hazards of lead-based paint exposure before certain renovations are begun on that housing. The EPA believes that the distribution of the pamphlet will help to reduce the exposures that cause serious lead poisonings, especially in children under age six, who are particularly susceptible to the hazards of lead.

Recordkeeping and reporting requirements are necessary to ensure effective implementation.

2(c). Uses, Users, and Purpose of the Information Collection

Owners/Occupants of target housing and child-occupied facilities, child-occupied facility operators, and parents/guardians. The owner/occupant of target housing or a child-occupied facility must be provided with a lead hazard information pamphlet before any renovation commences. If the child-occupied facility is not operated by the owner of the building, an adult representative of the child-occupied facility must also be provided with a lead hazard information pamphlet. Parents and guardians of children using child-occupied facilities must be provided with general information on the renovation as well as the pamphlet, or information on how to obtain a copy of the pamphlet.

Information contained in this pamphlet may be used by homeowners/occupants, public or commercial building owners, child-occupied facility operators, and parents or guardians to take appropriate precautions to minimize the exposure of children to lead-based paint hazards created by renovations. Parents and guardians may also use general information about the renovation for the purpose of minimizing the exposure of their children to lead-based paint hazards created by renovations.

The record of compliance could also serve as a crucial piece of information in civil actions to establish liability.

EPA. This information collection will provide the EPA with materials necessary to authorize state renovation and lead-based paint activities programs and to serve as the accrediting and certifying body in states without authorized programs (discussed further below).

EPA/States. This collection will enable the EPA/states to determine compliance with and enforce the requirements for training, certification, accreditation, and work practice standards for renovations and lead-based paint activities. Without this collection, there would be no meaningful way of ensuring the implementation of the statutory objective: to ensure that

trained individuals conduct renovations and lead-based paint activities 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 EPA/states require for these activities are central to the activity. In addition, the EPA will be relying on training provider notifications to keep track of which individuals have received accredited renovator training. This information will be a critical part of the EPA's compliance monitoring and enforcement activities.

The re-certification and re-accreditation requirements for individuals and training programs are meant to ensure that training programs incorporate new developments and technologies in their courses in order to provide adequate training to individuals. The EPA believes this will ensure that individuals and firms conduct renovations and lead-based paint activities in the safest and most effective manner possible.

The records individuals and firms have to compile and retain are necessary as a reference for building owners/occupants, EPA or authorized entities. These records demonstrate that the activities are done in a safe and effective manner, according to the minimum work practice standards established by the rules. These recordkeeping requirements are also necessary to permit the EPA to target its 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 EPA's collection pursuant to the TSCA 402/404/406/407 regulations do not duplicate any other collection. There is no other Federal 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 target housing or child-occupied facilities.

3(b). Consultations and Public Comments

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, 2015). No comments were received during this period.

In addition to the public notice and comment period, OMB regulations, at 5 CFR 1320.8(d)(1), require agencies to consult with potential ICR respondents and data users about specific aspects of an ICR before the EPA submits the 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 nine

individuals listed in this section. EPA did not receive comments from the nine individuals contacted.

| | |
|--|--|
| Kary Amin NOVA Environmental, Inc. 734-930-0995 | Andrew McLellan Environmental Education Associates 888-436-8338 |
| Vince Butler BBC Builders 703-878-3300 | Mike Nagel Men at Work Chicago 847-359-3591 |
| Kevin Gaul Pella Corporation 641-621-1000 | Thomas Nunziata Laborers' International Union of North America 860-974-0800 |
| Bob Hanbury House of Hanbury Builders Inc 860-666-1537 | Mark Mikkelson Andersen Windows 651-264-5150 |
| Steve Heiteen Portland Remodel 503-244-3525 | |

3(c). Effects of Less Frequent Collection

Due to the nature of the renovation and lead-based paint activities regulations and their related information collection activities, less frequent collection is not feasible. In particular, each individual and firm must obtain certification and re-certification, each training program must obtain accreditation and re-accreditation as well as specific notification and documentation prior to commencement and upon completion of each lead-based paint activity and renovation course, and each lead-based paint activity is a separate and unique event requiring specific notification and documentation. Program approval for states is a one-time activity, although there is ongoing reporting.

The 406(b) information distribution requirements at 40 CFR part 745, subpart E, do not include any reporting requirements, only recordkeeping requirements. Therefore, a collection schedule is not applicable.

3(d). Small Entity Flexibility

The EPA believes that the regulatory requirements do not unduly burden small businesses. The certification process for firms and individuals is very simple. The EPA allows flexibility in the way that information is prepared and presented, in that there are no mandatory forms to complete, the EPA's Central Data Exchange (CDX) can be used in many instances, and faxed notifications are also permitted. In addition, as part of the development process for the 2008 RRP rule, the EPA convened a Small Business Advocacy Review Panel under the Regulatory Flexibility Act. More information on the Panel, and the EPA's assessment of the impacts on small businesses, can be found in the preamble to the 2008 RRP rule. The Clearance final rule imposed minimal additional burden on the estimated 159 small business training providers affected.

In promulgating the regulations at 40 CFR part 745, subpart E, the EPA attempted to minimize the 406b reporting and recordkeeping burden for both large and small regulated entities. While small businesses constitute the majority of affected entities, hour and cost burden imposed by the regulations is not considered to be of sufficient magnitude to have significant economic impacts on such establishments.

3(e). General PRA Related 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 or five years. Authorized States must report once a year for the first three years, and biannually thereafter. The final Clearance 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

The 406(b) information distribution requirements at 40 CFR part 745, subpart E do not exceed any of the Paperwork Reduction Act guidelines at 5 CFR 1320.5.

3(f). Confidentiality

The regulations for the TSCA Section 402 and Section 404 Training, Certification, Accreditation and Standards for Lead-Based Paint Activities and Renovation, Repair, and Painting do not address questions of a confidential nature.

Since the 406(b) information distribution requirements at 40 CFR part 745, subpart E involve only recordkeeping and 3rd-party notifications, EPA does not believe that respondents submit any information to the EPA or that, in doing so, would assert a confidentiality claim for information collected under this ICR. However, to the extent information submitted by respondents is business confidential, procedures are in place to protect the information from improper disclosure consistent with section 14 of TSCA; 40 CFR part 2, subpart B; and 40 CFR 745.84.

3(g). Sensitive Questions

This information collection does not include questions of a sensitive nature.

4. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

4(a). Agency Activities

EPA will perform the following activities in response to the submittals related to renovation and lead-based paint activity submissions:

- Receive, review, and act on applications from states
- Receive, review, and file reports from authorized states
- Receive, review, and act on applications and amended applications for accreditation from training providers
- Receive, review, and file notices of trainings from training providers
- Receive, review, and file materials sent from accredited training providers
- Receive, review, and act on certification applications from firms/individuals
- Receive, review, and file notices of abatement activities from certified abatement firms.

There are no EPA activities associated with the distribution of the 406(b) lead hazard information pamphlets to owners and occupants of target housing and COFs prior to commencing renovations for compensation.

4(b). Estimated Agency Costs

EPA estimates that it costs the EPA approximately \$3,590,392 to carry out the activities associated with the information collection activities covered by this ICR. This ICR renewal includes a cost estimate for the administration of the LBP and RRP programs by the EPA. The per-activity burdens are taken from those derived in EPA's (2009) Economic Analysis for the TSCA Section 402 Lead-Based Paint Program Accreditation and Certification Fee Rule.¹ The numbers of events are estimated for each respondent type, and following the methodology of previously approved ICRs (EPA ICR No. 1715.10).

The EPA will make use of existing technology to simplify the application and notification processes where available. In addition to the more traditional methods (mail, commercial delivery service, or hand delivery), the EPA will accept faxed course notifications from training providers as well as notifications through EPA's 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. In addition, lead abatement firms, evaluation firms, individuals, and renovation, repair, and painting firms may use CDX to apply for certification and re-certification.

There are no EPA activities associated with the distribution of the 406(b) lead hazard information pamphlet to owners and occupants of target housing and COFs prior to commencing renovations for compensation. However, under the provisions of 40 CFR 745.87, EPA may conduct inspections and issue subpoenas pursuant to the provisions of TSCA section 11 (15 U.S.C. 2610) to ensure compliance with 40 CFR part 745, subpart E.

¹ Burdens were rounded to the nearest significant two digits and burdens less than 0.01 were rounded up to 0.01.

4(b)(i). 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 the Clearance 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;
- Renovation 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;
- Lead-based paint firms/individuals must apply for re-certification every three years (five for individuals who have passed a proficiency test as part of their training) after initial certification for lead-based paint activities.

The EPA believes that receipt of notification of five and seven business days respectively prior to conducting lead-based paint abatement activities or training courses is necessary to facilitate the inspection of abatement and training locations. The regulation also includes provisions for updating the original notification. The EPA determined that the time periods for initial notification will also apply to a change in course location, or if the course is to be presented earlier than described in the original notification. Other changes, including cancellation of courses or abatement projects, need only be received by the EPA at least two business days before a training course is scheduled to begin, or by the start date of an abatement activity. Such notification periods are appropriate to allow proper allocation of EPA compliance monitoring and enforcement resources, and to prevent the arrival of EPA personnel at the wrong location or time.

The 406(b) information distribution requirements at 40 CFR part 745, subpart E, do not include any reporting requirements, only recordkeeping requirements. Therefore, a collection schedule is not applicable.

4(b)(ii). Use of Technology to Facilitate Collection Activities

The EPA will make use of existing technology to simplify the application and notification processes where available. In addition to the more traditional methods (mail, commercial delivery service, or hand delivery), the EPA will accept faxed course notifications from training

providers as well as notifications through EPA's 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. In addition, lead abatement and evaluation firms, individuals and renovation, repair, and painting firms may use CDX to apply for certification and re-certification.

5. The RESPONDENTS AND INFORMATION COLLECTION (IC) ACTIVITIES

For each respondent category, this section of the ICR describes the respondents, the information collection activities and related estimates for burden and costs associated with those activities.

5(a). Methodology for Estimating Respondent Burden and Costs

The lead-based paint activities and renovation, repair, and painting regulations specify reporting and recordkeeping for training providers and individuals/firms undertaking lead-based paint activities and/or renovations in target housing and child-occupied facilities.

The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the paperwork requirements are described below:

| | |
|--------|---|
| 236115 | Single Family Housing Construction |
| 236116 | Multifamily Housing Construction |
| 236210 | Manufacturing and Industrial Building Construction |
| 236220 | Commercial and Institutional Building Construction |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238320 | Painting and Wallpapering |
| 238210 | Electrical Contractors |
| 238140 | Masonry and Stone Contractors |
| 238310 | Drywall, Plastering, Acoustical, and Insulation Contractors |
| 238340 | Tile (except resilient) Contractors |
| 238350 | Carpentry Contractors |
| 238330 | Floor Laying and Other Floor Contractors |
| 238160 | Roofing, Siding, and Sheet Metal Contractors |
| 238110 | Concrete Contractors |
| 213111 | Water Well Drilling Contractors |
| 238120 | Structural Steel Erection Contractors |
| 238210 | Electrical Contractors and Other Wiring Installation Contractors |
| 238910 | Excavation Contractors |
| 238910 | Wrecking and Demolition Contractors |
| 238290 | Other Building Equipment Contractors |
| 238390 | Building Fixture and Fitting (except mechanical equipment) installation |
| 236118 | Residential Remodelers |
| 238150 | Glass and Glazing Contractors |
| 238170 | Siding Contractors |
| 238210 | Electrical Contractors |

| | |
|--------|--|
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238290 | Other Building Equipment Contractors |
| 238310 | Drywall and Insulation Contractors |
| 238340 | Tile and Terrazzo Contractors |
| 238350 | Finish Carpentry Contractors |
| 238390 | Other Building Finishing Contractors |
| 531110 | Lessors of Residential Buildings and Dwellings |
| 531190 | Lessors of Other Real Estate Property |
| 531210 | Offices of Real Estate Agents and Brokers |
| 531311 | Residential Property Managers |
| 531320 | Offices of Real Estate Appraisers |
| 531390 | Other Activities Related to Real Estate |
| 541330 | Engineering Services |
| 541350 | Building Inspection Services |
| 562910 | Remediation Services |
| 611110 | Elementary and Secondary Schools |
| 611513 | Apprenticeship Training |
| 611519 | Other Technical and Trade Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |
| 624410 | Child Day Care Services |
| 923120 | Administration of Public Health Programs |
| 924110 | Administration of Air and Water Resource and Solid Waste Management Programs |
| 925110 | Administration of Housing Programs |

5(b).

IC #1: LBP training provider accreditation applications, training notifications, and recordkeeping

Respondent NAICS Codes

| | |
|--------|---|
| 611513 | Apprenticeship Training |
| 611519 | Other Technical and Trade Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |

Information Collection Activities

To receive accreditation to provide lead-based paint activities or renovation training, training providers must submit the following documents to the EPA/states, using the form entitled either the sample EPA Form 8500-25, entitled “Accreditation Application for Training Programs” (see attachment 3) or a similar form.

Training providers are required 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. Accredited training providers must apply for re-accreditation every four years.

Before giving a lead-based paint activity training, training providers must provide notification to the EPA, using either the sample form entitled “Lead-Based Paint Activities and Renovation Training Notification” (see Attachment 6) or a similar form containing the required information. Training providers may provide electronic submissions using the EPA’s secure, Internet-based Central Data Exchange (CDX). (The paperwork activities, related burden and costs with CDX user registration are described in an ICR approved under OMB Control No. 2025-0003.)

Training providers must update the EPA regarding any changes to training dates, course locations, course cancellations, or other changes to the original notice.

Following completion of lead-based paint activities training providers must provide notice using either the sample form entitled “Lead-Based Paint Activities and Renovation Post-Training Notification” (see Attachment 7) or a similar form containing the required information. Training providers may submit electronic submissions using the EPA’s CDX.

Training course providers must maintain records of the qualifications of key staff, current course materials, a quality control plan, results of hands-on assessments and course tests and a record of each student’s course completion certificate.

Providers of e-learning courses are required to maintain records on each student’s course log-ins, launches, progress, and completion.

| IC# 1. LBP training provider accreditation applications, training notifications, and recordkeeping | | | | |
|---|-----------------------|------------------|-----------------------|-------------|
| Citation: 40 CFR 745, subpart L | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| LBP activity training providers / initial accreditation / reporting | 8500-25 | 53 | 1,447 | 71,761 |
| LBP activity training providers / renewal accreditation / reporting | N/A | 212 | 1,129 | 55,332 |
| LBP activity training providers / pre-training notification / reporting | Training Notification | 1,855 | 371 | 17,561 |

| | | | | |
|---|----------------------------|--------------|--------------|-------------------|
| LBP activity training providers / re-training re-notification / reporting | N/A | 795 | 159 | 7,526 |
| LBP activity training providers / post-training notification / reporting | Post-Training Notification | 1,060 | 636 | 34,243 |
| LBP training providers / recordkeeping | 8500-25 | 265 | 79 | 2,575 |
| LBP Training Provider CDX registration and usage | | 199 | 498 | 26,656 |
| | Total | 4,439 | 4,319 | \$ 215,654 |

IC #2: LBP activity firm certification activities

Respondent NAICS Codes

562910 Remediation Services

Information Collection Activities

To obtain firm certification to perform lead-based paint activities or renovations in target housing or child-occupied facilities, firms must submit specific materials to the EPA/states, using the EPA's CDX, or the EPA form "Application for Firms to Conduct Lead-based Paint Activities or Renovations" (EPA Form 8500-27; see Attachment 4).

Firms may later amend their applications to add or modify information. Lead-based paint activities firms must be recertified every three years.

Firms seeking certification for lead-based paint activities must perform the following activities:

- Read the regulation
- Submit an application
- Retain Records of individuals that conduct lead-based paint activities, and that the firm and its employees shall follow the work practice standards in 40 CFR 745.227.

| IC# 2. LBP activity firm certification activities | | | | |
|--|------------------|------------------|-----------------------|-------------|
| Citation: 40 CFR 745, subpart L | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| LBP activity firms / initial certification / reporting | EPA Form 8500-27 | 4,235 | 31,763 | 1,685,665 |
| LBP activity firms / renewal certification / reporting | EPA Form 8500-27 | 4,882 | 7,323 | 373,727 |

| | | | | |
|---|------------------|---------------|---------------|---------------------|
| LBP firms / certification / recordkeeping | EPA Form 8500-27 | 9,117 | 91 | 2,402 |
| LBP firms CDX registration and usage | | 6,537 | 16,343 | 875,631 |
| | Total | 24,771 | 55,519 | \$ 2,937,425 |

IC #3: Individuals performing LBP abatement activities; certification and accreditation / reporting and recordkeeping Respondents

Respondent NAICS Codes

562910 Remediation Services

Information Collection Activities

Individuals who wish to perform lead-based paint activities in target housing or child-occupied facilities must also receive certification from the EPA/states. To obtain certification, an individual must complete an accredited training course and receive a course completion certificate, pass a third-party certification exam, meet specific education/experience requirements, and demonstrate this to the EPA/states.

Individuals certified to perform lead-based paint activities must take a refresher course and apply for re-certification every three years (five for individuals who have passed a proficiency test as part of their training). The rule also requires individuals to develop records of the lead-based paint activities and renovations they undertake to demonstrate compliance with standards and provide a written record for future reference. These notification and recordkeeping requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections.

IC# 3. Individuals performing LBP abatement activities; certification and accreditation reporting and recordkeeping

Citation: 40 CFR 745, subpart L

| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
|---|------------------|-----------|----------------|--------------|
| Individuals performing LBP abatement activities; certification and accreditation / reporting and recordkeeping & CDX registration | EPA 747-B-99-002 | 11,781 | 31,691 | \$ 1,366,916 |

IC# 4: LBP activity firm pre-abatement reports and occupant protection plans, abatement activity notifications, post-abatement reports and recordkeeping

Respondent NAICS Codes

562910 Remediation Services

Information Collection Activities

In the performance of lead-based paint activities, firms/individuals must complete and retain a number of reports (contingent on the activity conducted), including an inspection report, a lead hazard screen report, a risk assessment report, an occupant protection plan, and an abatement report.

Certified firms must notify the EPA prior to beginning lead-based paint abatement activities (except in emergency situations) and provide an updated notice if needed, using either the sample form entitled "Notification of Lead-Based Paint Abatement Activities" (see Attachment 8) or a similar form containing the required information. Certified firms may also provide electronic submissions using the EPA's CDX.

| IC# 4. LBP activity firm pre-abatement reports and occupant protection plans, abatement activity notifications, post-abatement reports and recordkeeping | | | | |
|---|--|------------------|-----------------------|-------------|
| Citation: 40 CFR 745, subpart L | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| LBP activity firms / evaluation reports / reporting | EPA Form 8500-27 | 145,872 | 264,757 | 14,229,465 |
| LBP activity firms / post-abatement report / reporting | None | 9,117 | 17,550 | 943,075 |
| LBP activity firms / occupant protection plan / reporting | None | 9,117 | 8,433 | 454,586 |
| LBP activity firms / pre-abatement notifications / reporting | Notification of Lead-Based Paint Abatement Activities | 9,117 | 3,875 | 209,954 |
| LBP firms / reports / recordkeeping | Notification of Lead-Based Paint Abatement Activities, Sample Renovation Recordkeeping Checklist | 173,223 | 1,732 | 1,732 |

| | | | | |
|--|---|----------------|----------------|---------------------|
| LBP activity firms / re-abatement re-notifications / reporting | Notification of Lead-Based Paint Abatement Activities | 524 | 112 | 6,248 |
| LBP Firms / pre-notifications / recordkeeping | Notification of Lead-Based Paint Abatement Activities | 524 | 5 | 5 |
| Total | | 347,494 | 296,465 | \$15,845,065 |

IC# 5: RRP training provider accreditation applications, training notifications, and recordkeeping

Respondent NAICS Codes

| | |
|--------|---|
| 611513 | Apprenticeship Training |
| 611519 | Other Technical and Trade Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |

Information Collection Activities

Training programs seeking to offer training for inspectors, risk assessors, project designers, abatement supervisors, abatement workers, renovators or dust sampling technicians must obtain EPA/state accreditation. In order for the EPA/states to have the information necessary to evaluate and accredit the training programs, training providers must prepare and submit application packages (see Attachment 3). 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 EPA (i) prior to providing training courses, and (ii) following completion of training courses. Training programs must apply for re-accreditation every four years.

| IC# 5. RRP training provider accreditation applications, training notifications, and recordkeeping | | | | |
|---|------------------|------------------|-----------------------|-------------|
| Citation: 40 CFR 745, subpart E | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| RRP training providers / initial accreditation / reporting | EPA Form 8500-25 | 222 | 6,127 | 303,227 |
| <i>RRP training providers / reaccreditation / reporting</i> | None | 56 | 517 | 25,527 |
| <i>Accredited Cohort Rule Familiarization Maintenance</i> | None | 329 | 554 | 29,683 |

| | | | | |
|--|----------------------------|-------|---------------|------------------|
| RRP training providers / pre-training notification / reporting | Training Notification | 7,784 | 1,557 | 77,163 |
| RRP training providers / pre-training pre-notification / reporting | Training Notification | 1,112 | 222 | 11,023 |
| RRP training providers / post-training notification / reporting | Post-Training Notification | 7,784 | 4,670 | 251,025 |
| RRP training providers / recordkeeping | EPA Form 8500-25 | 556 | 127 | 4,538 |
| CDX Registration & Usage | | 467 | 1,168 | 62,555 |
| | Total | | 18,310 | 14,942 |
| | | | | \$764,742 |

IC# 6: Private RRP firm certification activities

Respondent NAICS Codes

236115 Single Family Housing Construction
 236116 Multifamily Housing Construction
 236210 Manufacturing and Industrial Building Construction
 236220 Commercial and Institutional Building Construction
 238220 Plumbing, Heating, and Air-Conditioning Contractors
 238320 Painting and Wallpapering
 238210 Electrical Contractors
 238140 Masonry and Stone Contractors
 238310 Drywall, Plastering, Acoustical, and Insulation Contractors
 238340 Tile (except resilient) Contractors
 238350 Carpentry Contractors
 238330 Floor Laying and Other Floor Contractors
 238160 Roofing, Siding, and Sheet Metal Contractors
 238110 Concrete Contractors
 213111 Water Well Drilling Contractors
 238120 Structural Steel Erection Contractors
 238210 Electrical Contractors and Other Wiring Installation Contractors
 238910 Excavation Contractors
 238910 Wrecking and Demolition Contractors
 238290 Other Building Equipment Contractors
 238390 Building Fixture and Fitting (except mechanical equipment) installation
 236118 Residential Remodelers
 238150 Glass and Glazing Contractors
 238170 Siding Contractors
 238210 Electrical Contractors
 238220 Plumbing, Heating, and Air-Conditioning Contractors
 238290 Other Building Equipment Contractors
 238310 Drywall and Insulation Contractors

| | |
|--------|---|
| 238340 | Tile and Terrazzo Contractors |
| 238350 | Finish Carpentry Contractors |
| 238390 | Other Building Finishing Contractors |
| 531110 | Lessors of Residential Buildings and Dwellings |
| 531190 | Lessors of Other Real Estate Property |
| 531311 | Residential Property Managers |
| 531390 | Other Activities Related to Real Estate |
| 541330 | Engineering Services |
| 541350 | Building Inspection Services |
| 562910 | Remediation Services |
| 611110 | Elementary and Secondary Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |
| 624410 | Child Day Care Services |

Information Collection Activities

Firms that wish to engage in lead-based paint activities or renovations in target housing or child-occupied facilities must obtain certification from the EPA/states. This includes firms consisting only of one self-employed individual, and property management companies, building owners, private schools and daycare centers performing work with their own employees. To obtain firm certification firms must submit specific materials to the EPA/states, using the EPA's CDX, the EPA form "Application for Firms to Conduct Lead-based Paint Activities or Renovations" (EPA Form 8500-27; see Attachment 4) or a similar form requiring the same information.

| IC# 6. Private RRP firm certification activities | | | | |
|---|--------------|------------------|-----------------------|---------------------|
| Citation: 40 CFR 745, subpart E | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| Private RRP firms / initial certification / reporting | None | 30,000 | 105,000 | 4,759,650 |
| <i>Private RRP firms /recertification / reporting</i> | None | 70,000 | 140,000 | 6,365,100 |
| <i>Certified Cohort Rule Familiarization Maintenance</i> | None | 200,000 | 200,000 | 9,030,000 |
| <i>RRP firms / certification / recordkeeping</i> | None | 100,000 | 1,000 | 26,350 |
| CDX Registration & Usage | None | 84,000 | 210,000 | 11,986,800 |
| | Total | 484,000 | 656,000 | \$32,167,900 |

IC# 7: Distribution of pre-renovation lead hazard information pamphlet and post-renovation checklists documenting lead-safe work practices

Respondents NAICS Codes

| | |
|--------|---|
| 236115 | Single Family Housing Construction |
| 236116 | Multifamily Housing Construction |
| 236210 | Manufacturing and Industrial Building Construction |
| 236220 | Commercial and Institutional Building Construction |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238320 | Painting and Wallpapering |
| 238210 | Electrical Contractors |
| 238140 | Masonry and Stone Contractors |
| 238310 | Drywall, Plastering, Acoustical, and Insulation Contractors |
| 238340 | Tile (except resilient) Contractors |
| 238350 | Carpentry Contractors |
| 238330 | Floor Laying and Other Floor Contractors |
| 238160 | Roofing, Siding, and Sheet Metal Contractors |
| 238110 | Concrete Contractors |
| 213111 | Water Well Drilling Contractors |
| 238120 | Structural Steel Erection Contractors |
| 238210 | Electrical Contractors and Other Wiring Installation Contractors |
| 238910 | Excavation Contractors |
| 238910 | Wrecking and Demolition Contractors |
| 238290 | Other Building Equipment Contractors |
| 238390 | Building Fixture and Fitting (except mechanical equipment) installation |
| 236118 | Residential Remodelers |
| 238150 | Glass and Glazing Contractors |
| 238170 | Siding Contractors |
| 238210 | Electrical Contractors |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238290 | Other Building Equipment Contractors |
| 238310 | Drywall and Insulation Contractors |
| 238340 | Tile and Terrazzo Contractors |
| 238350 | Finish Carpentry Contractors |
| 238390 | Other Building Finishing Contractors |
| 531110 | Lessors of Residential Buildings and Dwellings |
| 531190 | Lessors of Other Real Estate Property |
| 531311 | Residential Property Managers |
| 531390 | Other Activities Related to Real Estate |
| 541330 | Engineering Services |
| 541350 | Building Inspection Services |
| 562910 | Remediation Services |
| 611110 | Elementary and Secondary Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |
| 624410 | Child Day Care Services |

Information Collection Activities

No more than 60 days before beginning renovation activities in any residential dwelling unit of target housing or COF, the firm performing renovations must provide the owner and or occupant(s) of the building with the pre-renovation lead hazard information pamphlet and

comply with recordkeeping procedures. If the owner does not occupy the dwelling unit, the firm performing renovations must provide an adult occupant of the unit with the pamphlet. The firm must keep documentation providing proof that the pamphlet was provided to the owner and occupant or that an attempt was made to provide the pamphlet to the owner and occupant of the target housing (e.g., collect signed acknowledgment form, provide self-certification for failed deliveries, and document mailing the information). No more than 60 days before beginning renovation activities in common areas, the firm must provide the owner of the multi-unit housing or COF with a lead hazard information pamphlet, and comply with recordkeeping procedures. In addition, the firm performing renovations must notify in writing, or ensure written notification of, occupant of each affected unit and make the pamphlet available upon request prior to the start of the renovation. Finally, the firm performing renovations must prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and to provide the pamphlet.

Firms performing renovations must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with the requirements of 40 CFR part 745, subpart E, for a period of three years following completion of the renovation activities in target housing. These requirements include the retention of the acknowledgement of receipt of the lead hazard information pamphlet, certifications of attempted delivery, and certifications of mailing.

In the performance of renovation activities, firms are required to maintain records demonstrating compliance with the final rule requirements for using certified renovators and properly trained workers, posting signs, containing and cleaning the renovation work area, and performing a post-renovation cleaning verification or dust clearance testing after renovation activity is finished.

| IC# 7. Distribution of pre-renovation lead hazard information pamphlet and post-renovation checklists documenting lead-safe work practices | | | | |
|--|-------------|------------------|-----------------------|-------------|
| Citation: 40 CFR 745 Subpart E | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| Pre-Renovation Information Dissemination by Contractors Working in Occupied Target Housing Rental Units | None | 1,621,277 | 455,579 | 22,677,042 |
| Pre-Renovation Information Dissemination by Contractors Working in Owner-Occupied Target Housing | None | 4,937,525 | 898,630 | 46,991,905 |
| Pre-Renovation Information Dissemination by Contractors Working in Vacant Target Housing Rental Units and Common Areas | None | 4,912,960 | 1,301,934 | 65,169,186 |
| Pre-Renovation Information Dissemination by Contractors Working in Owner-Occupied Child-Occupied Facilities and by Landlords Working in Rental Child-Occupied Facilities | None | 114,569 | 30,361 | 1,519,729 |

| | | | | |
|--|---|-------------------|------------------|-----------------------|
| Pre-Renovation Information Dissemination by Contractors Working in Rental Child-Occupied Facilities | None | 6,138 | 2,271 | 118,497 |
| Pre-Renovation Information Dissemination by Private Schools and Daycare Centers for In-House Renovation Activities | None | 25,530 | 5,106 | \$263,729 |
| RRP firm checklist / owner-occupied target housing / third party disclosure | Sample Renovation Recordkeeping Checklist | 6,869,604 | 343,480 | 16,195,091 |
| RRP firm checklist / renter-occupied target housing / third party disclosure | Sample Renovation Recordkeeping Checklist | 7,360,290 | 368,015 | 18,087,913 |
| RRP firm checklist / in-house or landlord / third party disclosure | Sample Renovation Recordkeeping Checklist | 29,441 | 1,472 | 69,407 |
| RRP firm checklist / owner-occupied child-occupied facility (COF), contractor / third party disclosure | Sample Renovation Recordkeeping Checklist | 208,542 | 10,427 | 491,638 |
| RRP firm checklist / renter-occupied child-occupied facility (COF), contractor / third party disclosure | None | 9,814 | 491 | 25,099 |
| RRP Firms / recordkeeping / recordkeeping | Sample Renovation Recordkeeping Checklist | 245,343 | 1,177,646 | 53,173,188 |
| | Total | 26,341,033 | 4,595,411 | \$ 224,782,425 |

IC# 8: Government-employed RRP professional certification activities, distribution of lead hazard information pamphlet prior to renovation activities, post-renovation checklists documenting lead-safe work practices, and recordkeeping

Respondents NAICS Codes

| | |
|--------|--|
| 611110 | Elementary and Secondary Schools |
| 611699 | All Other Miscellaneous Schools and Instruction |
| 923120 | Administration of Public Health Programs |
| 924110 | Administration of Air and Water Resource and Solid Waste Management Programs |
| 925110 | Administration of Housing Programs |

Information Collection Activities

No more than 60 days before beginning renovation activities in any residential dwelling unit of target housing or COF, the government entity performing renovations must provide the owner and or occupant(s) of the building with the pre-renovation lead hazard information pamphlet and comply with recordkeeping procedures. If the owner does not occupy the dwelling unit, the government entity performing renovations must provide an adult occupant of the unit with the pamphlet. The government entity must keep documentation providing proof that the pamphlet was provided to the owner and occupant or that an attempt was made to provide the pamphlet

to the owner and occupant of the target housing (e.g., collect signed acknowledgment form, provide self-certification for failed deliveries, and document mailing the information). No more than 60 days before beginning renovation activities in common areas, the government entity must provide the owner of the multi-unit housing or COF with a lead hazard information pamphlet, and comply with recordkeeping procedures. In addition, the government entity performing renovations must notify in writing, or ensure written notification of, each affected unit and make the pamphlet available upon request prior to the start of the renovation. Finally, the government entity performing renovations must prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and to provide the pamphlet.

Government entities performing renovations must retain and, if requested, make available to EPA all records necessary to demonstrate compliance with the requirements of 40 CFR part 745, subpart E, for a period of three years following completion of the renovation activities in target housing. These requirements include the retention of the acknowledgement of receipt of the lead hazard information pamphlet, certifications of attempted delivery, and certifications of mailing.

Government entities that wish to engage in renovations in target housing or child-occupied facilities must obtain certification from the EPA/states. This includes government entities consisting only of one self-employed individual. To receive certification, a government entity must submit an application to the EPA/states and re-certify every five years. The rule also requires government entities to develop and retain records of the renovation activities they undertake to demonstrate compliance with standards and provide a written record for future reference.

| IC# 8. Government-employed RRP professional certification activities, distribution of lead hazard information pamphlet prior to renovation activities, post-renovation checklists documenting lead-safe work practices, and recordkeeping | | | | |
|--|--------------|------------------|-----------------------|--------------------|
| Citation: 40 CFR 745 subpart E | | | | |
| Data Element (w/ hyperlinks) | Form | Responses | Burden (hours) | Cost |
| <i>Initial Certification</i> | | 1,389 | 4,862 | 261,354 |
| <i>Renewal Certification</i> | | 1,597 | 8,624 | 463,069 |
| Government entities / recordkeeping | None | 6,670 | 32,016 | 2,106,012 |
| Government entities / in-house or landlord / third party disclosure | None | 53,360 | 2,668 | 212,319 |
| Pre-Renovation Information Dissemination by Schools for In-House Renovation Activities | None | 36,275 | 7,255 | 435,876 |
| | Total | 99,291 | 55,424 | \$3,478,631 |

IC# 9: RRP and LBP professionals classroom training time related to recordkeeping compliance

Respondents NAICS Codes

| | |
|--------|---|
| 236115 | Single Family Housing Construction |
| 236116 | Multifamily Housing Construction |
| 236210 | Manufacturing and Industrial Building Construction |
| 236220 | Commercial and Institutional Building Construction |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238320 | Painting and Wallpapering |
| 238210 | Electrical Contractors |
| 238140 | Masonry and Stone Contractors |
| 238310 | Drywall, Plastering, Acoustical, and Insulation Contractors |
| 238340 | Tile (except resilient) Contractors |
| 238350 | Carpentry Contractors |
| 238330 | Floor Laying and Other Floor Contractors |
| 238160 | Roofing, Siding, and Sheet Metal Contractors |
| 238110 | Concrete Contractors |
| 213111 | Water Well Drilling Contractors |
| 238120 | Structural Steel Erection Contractors |
| 238210 | Electrical Contractors and Other Wiring Installation Contractors |
| 238910 | Excavation Contractors |
| 238910 | Wrecking and Demolition Contractors |
| 238290 | Other Building Equipment Contractors |
| 238390 | Building Fixture and Fitting (except mechanical equipment) installation |
| 236118 | Residential Remodelers |
| 238150 | Glass and Glazing Contractors |
| 238170 | Siding Contractors |
| 238210 | Electrical Contractors |
| 238220 | Plumbing, Heating, and Air-Conditioning Contractors |
| 238290 | Other Building Equipment Contractors |
| 238310 | Drywall and Insulation Contractors |
| 238340 | Tile and Terrazzo Contractors |
| 238350 | Finish Carpentry Contractors |
| 238390 | Other Building Finishing Contractors |
| 531110 | Lessors of Residential Buildings and Dwellings |
| 531190 | Lessors of Other Real Estate Property |
| 531210 | Offices of Real Estate Agents and Brokers |
| 531311 | Residential Property Managers |
| 531320 | Offices of Real Estate Appraisers |
| 531390 | Other Activities Related to Real Estate |
| 541330 | Engineering Services |
| 541350 | Building Inspection Services |
| 562910 | Remediation Services |

Information Collection Activities

RRP and LBP professionals are required to take initial or renewal training courses as part of obtaining or maintaining their certifications. The entire class time for each initial and renewal training class is included in the table for IC #9. Average round trip travel time to the training class of 1.8 hours is included in the burden hours.

EPA maintains a database containing the number of students per class and the number of times each class is taught per year.

| IC# 9. RRP & LBP training course time dedicated to recordkeeping | | | | |
|---|-------------|------------------|-----------------------|---------------------|
| Citation: 40 CFR 745, subpart L and subpart E | | | | |
| Data Element | Form | Responses | Burden (hours) | Cost |
| RRP Training | None | 30,002 | 294,020 | 13,274,985 |
| LBP Abatement Worker | None | 824 | 21,259 | 692,412 |
| LBP Abatement Supervisor | None | 288 | 9,734 | 439,508 |
| LBP Project Designer | None | 16 | 157 | 8,950 |
| LBP Risk Assessor | None | 240 | 4,272 | 192,881 |
| LBP Inspector | None | 304 | 7,843 | 268,316 |
| RRP Training Refresher | None | 70,000 | 406,000 | 18,330,900 |
| LBP Abatement Worker Refresher | None | 265 | 2,597 | 84,584 |
| LBP Abatement Supervisor Refresher | None | 305 | 2,989 | 134,953 |
| LBP Project Designer Refresher | None | 20 | 196 | 11,188 |
| LBP Risk Assessor Refresher | None | 280 | 2,744 | 123,892 |
| LBP Inspector Refresher | None | 175 | 1,715 | 58,670 |
| Total | | 102,719 | 753,526 | \$33,621,239 |

5(c). Total Estimated Respondent Burden and Costs

| IC Summary Table | | | |
|------------------------------|------------------|-----------------------|-------------|
| IC Category | Responses | Burden (hours) | Cost |
| IC 1: LBP Training Providers | 4,439 | 4,319 | 215,654 |
| IC 2: LBP firm activities | 24,771 | 55,519 | 2,937,425 |

| | | | |
|---|-------------------|------------------|-----------------------|
| IC 3: LBP individual activities | 11,781 | 31,691 | 1,366,916 |
| IC 4: LBP Reports, Plans, Notifications and Recordkeeping | 347,494 | 296,465 | 15,845,065 |
| IC 5: RRP Training Providers | 18,310 | 14,942 | 764,742 |
| IC 6: RRP Firm Activities | 484,000 | 656,000 | 32,167,900 |
| IC 7: RRP Pamphlet and Checklists | 26,341,033 | 4,595,411 | 224,782,425 |
| IC 8: RRP Government Firms | 99,291 | 55,424 | 3,478,631 |
| IC 9: RRP & LBP Training Class time | 102,719 | 753,526 | 3,621,239 |
| Total | 27,433,838 | 6,463,297 | \$ 315,179,997 |

6. PRA Burden Statement

Under the PRA, burden is defined at [5 CFR 1320.3\(b\)](#).

This information collection combines the burdens from three previously approved ICRs, EPA ICR No. 2381.03 (OMB Control No. 2070-0181), EPA ICR No. 1669.07 (OMB Control No. 2070-0158), and EPA ICR No. 1715.14 (OMB Control No. 2070-0155). The total combined burden from these three previously approved ICRs was 6,029,302 hours. The total burden requested for this ICR is 6,463,297 hours, or an increase of 433,995 hours from the previous total burden. The difference between the current burden request and the previously approved requests are due to adjustments in EPA's estimates of the burden. Several adjustments to the estimates were made, including:

- Revisions to the estimated number of respondents based on the number of respondents reporting to EPA for the prior information collection. The 2008 RRP Rule and the 2010 Opt-Rule have been in place for a few years and the ICR estimates use actual certification data instead of having to make broader assumptions about industry behavior and compliance rates; and
- Revisions based on market factors. The housing market and related industries including the housing rental, property management and the building renovation industry have yet to recover fully from the drop in the housing market.
- Adding an additional IC to account for training class time for RRP and LBP Abatement initial and refresher training classes. Travel time to and from the training class is included in these burden estimates.

The total combined cost burden from these three previously approved ICRs was \$291,575,709. The total cost burden requested for this ICR is \$315,179,997. The difference between the current cost burden request and the previously approved requests are due only to adjustments in EPA's estimates of the burden. In addition to the adjustments listed above, the wage rates and material costs were revised to reflect 2013 dollars for this information collection request. In certain disciplines, wage rates have actually decreased, likely due to the depressed housing market and overall economy. However, it was the addition of a new IC

category to account for training class time and travel which resulted in an estimated cost burden increase of \$23,604,288.

7. ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number **EPA-HQ-OPPT-2014-0486**. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described in the following listing.

- Attachment 1:** Toxic Substances Control Act (TSCA), 15 U.S.C. 2601 et seq.
- Attachment 2:** 40 CFR 745, Subparts E, L and Q
- Attachment 3:** EPA Form 8500-25: Application and Instructions for Training Providers Applying for Accreditation of Lead-Based Paint Activity and Renovation Training Programs
- Attachment 4:** EPA Form 8500-27: Application and Instructions for Firms Applying for Certification to Conduct Lead-Based Paint Activities and/or Renovations
- Attachment 5:** EPA Form 747-B-99-002: Application and Instructions for Individuals Applying for Certification to Conduct Lead-Based Paint Activities
- Attachment 6:** Lead-Based Paint Activities and Renovation Pre-Training Notification
- Attachment 7:** Lead-Based Paint Activities and Renovation Post-Training Notification
- Attachment 8:** Notification of Lead-Based Paint Abatement Activities
- Attachment 9:** Sample Renovation Recordkeeping Checklist
- Attachment 10:** The Lead-Safe Certified Guide to Renovate Right