

Request for a Non-Substantive Change to an Existing Approved Information Collection
(EPA ICR No. 2494.02, OMB Control No. 2070-0193)

I. Introduction

Why is EPA Requesting a Non-Substantive Change?

This non-substantive change request revises the estimated number of responses and burden based on actual experience with respondents participating in this ongoing information collection. Specifically, this change request recalculates both the unit burden estimates and the estimated number of screening responses needed to reach the target number of in-scope respondents in the approved Information Collection Request (ICR). This change request also revises one of the questionnaires in the survey to include an additional screening question. This is a non-substantive change because the information is already being collected in an existing question in the currently approved questionnaire. But including the question in the screening section of the questionnaire will better target respondents for the survey.

II. Background

Overview of the ICR

Section 402(c)(3) of the Toxic Substances Control Act directs EPA to revise the lead paint abatement regulations to address renovation or remodeling activities that create lead-based paint (LBP) hazards in target housing and public and commercial buildings (P&CBs). EPA's Office of Pollution Prevention and Toxics is investigating whether renovation, repair and painting (RRP) activities in P&CBs create LBP hazards. EPA submitted an ICR to OMB for a survey to collect information from construction contractors, property managers and lessors, and building occupants about RRP activities in P&CBs. The survey uses separate questionnaires for each group.

The survey is a one-time collection that gathers information about RRP activities in P&CBs and the steps taken to control the dust created when paint is disturbed. The survey results will be used in EPA's exposure assessment to determine if these RRP activities create LBP hazards. If there are LBP hazards, the survey results will also be used to support EPA's economic analysis and the development of a proposed rule.

The questionnaire starts with screening questions that ask respondents if they disturb paint in P&CBs, and if they ever disturb more than a specific amount of painted surfaces. Respondents that answer affirmatively to both screening questions are eligible to complete the full questionnaire. EPA plans to have a total of 402 respondents complete a full questionnaire. In the full questionnaire, each respondent is asked whether they perform different RRP activities (such as removing or replacing painted building components, cutting or making holes in painted surfaces, or preparing surfaces for painting). In the contractor questionnaire, an activity type is randomly selected and the respondent is prompted to recall the most recent job of that type that may have disturbed LBP, either because a test indicated the presence of LBP or because surfaces were disturbed that might contain paint applied before 1978. (If there were no recent jobs meeting these criteria the respondent is asked about the most recent job of this activity type.) The respondent is then asked a detailed series of questions about this job, including the containment and cleaning work practices that were used.

OMB approved this request under [OMB Control No.: 2070-0193](#) in August 2015, and EPA began conducting the survey in December 2016. Based on the experience with the survey since then, EPA is requesting several non-substantive changes to the ICR.

III. Description of Non-Substantive Changes

What Information Collection Request (ICR) is EPA changing?

ICR Title: Survey of the Public and Commercial Building Industry

ICR Number: EPA ICR No.: 2494.01; [OMB Control No.: 2070-0193](#)

What is the current status of this ICR?

This ICR is currently approved for 564 burden hours. The approval runs through August 31, 2018.

What are the changes that EPA is making to this ICR?

EPA is revising both the unit burden estimates and the estimated number of screening responses needed to reach the target number of in-scope respondents, based on the actual experience of respondents participating in the survey.

EPA is also revising the contractor questionnaire to screen out respondents that have not disturbed LBP during the past 12 months. In the survey responses provided so far, two-thirds of the contractors that passed the screen and completed the full questionnaire reported conducting no jobs during the past 12 months that might have disturbed LBP. Such responses do not provide information about baseline work practices in settings where lead dust may be generated. In order to better target the contractor survey to respondents who may disturb LBP, EPA is modifying the contractor questionnaire to include an additional screening question that is a slightly modified version of an existing question about a recent job where the paint might have contained lead. Table 1A lists the existing screening questions, Table 1B shows the existing question about disturbing lead-based paint in the full contractor questionnaire, and Table 1C describes the additional screening question.

Table 1A: Existing Screening Questions for Contractor Questionnaire

1. In the past 12 months did your company do any jobs in nonresidential buildings where you or your firm's employees disturbed painted surfaces?...
2. For those jobs where you or your firm's employees disturbed painted surfaces, did you ever need to disturb more than 6 square feet of interior painted surfaces or 20 square feet of exterior painted surfaces?

Table 1B: Existing Question about Disturbing Lead-Based Paint in Full Contractor Questionnaire

Q5.5.c. Were any of the [{number}](#) projects involving [{selected job type}](#) that you or your employees did in the last 12 months projects where there might have been lead-based paint, either because the paint was tested and lead was found OR the paint was not tested but you or your employees were disturbing painted surfaces where the paint was applied before 1978?

Table 1C: Additional Screening Question (modified version of existing Q5.5.c, changes shown in red)

3. Were any of **these jobs, where** you or your **firm's** employees **disturbed painted surfaces** in the last 12 months, projects where there might have been lead-based paint, either because the paint was tested and lead was found OR the paint was not tested but you or your employees were disturbing painted surfaces where the paint was applied before 1978?

As a result of this change, EPA's summary of the survey results will include separate estimates for responses about projects where (1) LBP was or might have been present, and (2) LBP was not present. Based on an analysis of whether or not the work practices used differ for these two groups of responses, the responses for projects where LBP was not present may be excluded from the primary estimates for the baseline level usage of lead-safe work practices. EPA will also present an analysis of the sensitivity of the estimates for the baseline level usage of lead-safe work practices to the inclusion or exclusion of these responses.

IV. Adjustments to Burden Estimates

Changes in Unit Burden

EPA is revising the unit burden estimates to reflect the experience thus far of respondents answering the questions. As shown in Table 2, the actual time to answer the survey questions is generally less than estimated in the ICR. The difference is largest for the full contractor survey, which was predicted to take 33 minutes per respondent but is averaging 18 minutes to complete.

Questionnaire	Response Type	Estimated Burden Per-Respondent in ICR (minutes)	Actual Burden Per-Respondent for Survey (minutes)	Difference (minutes)
Contractors	Screening only	3	2	-1
	Screening + Full Questionnaire	33	18	-15
Lessors and Property Managers	Screening only	3	2	-1
	Screening + Full Questionnaire	8	10	+2
Building Occupants	Screening only	3	3	0
	Screening + Full Questionnaire	8	10	+2

Changes in Number of Respondents

EPA is revising the estimated number of screening responses to reflect the actual proportion of respondents that are in scope for the survey. (This does not change the number of full questionnaires being completed, which remains a total 402 responses.) The proportion of contractors and lessors/property managers in scope is lower than assumed in the approved ICR, while the proportion of building occupants in scope is higher than predicted. Thus, the number of contractors and lessors/property managers to be screened is being increased from the currently approved ICR, while the number of building occupants to be screened is decreased. Adding an additional screening question to the contractor survey reduces the number of contractors that will be in scope, further increasing the number of respondents to be screened. As shown in Table 3, in order to get 402 responses to the full questionnaire, the number of respondents being screened is estimated to increase from 8,485 to 17,763.

Questionnaire	Response Type	Estimated Number of Responses in Approved ICR	Revised Estimate of Number of Responses	Difference
Contractors	Screening only	1,391	12,655	+11,264
	Screening + Full Questionnaire	254	254	0
Lessors and Property Managers	Screening only	1,972	2,964	+992
	Screening + Full Questionnaire	68	68	0
Building Occupants	Screening only	4,720	1,732	-2,998
	Screening + Full Questionnaire	80	80	0
Summary for All Respondents	Screening only	8,083	17,361	+9,278
	Screening + Full Questionnaire	402	402	0
	Total	8,485	17,763	+9,278

Net Impacts of Adjustments

The ICR is currently approved for 564 burden hours, as summarized in Table 4. As shown in Table 5, accounting for the changes in the unit burden and the number of screening responses needed to receive 402 full questionnaires, EPA estimates a net adjustment increase of 9,278 screening respondents and 144 hours, resulting in a total of 17,763 respondents and 708 burden hours for this ICR.

Questionnaire	Response Type	Estimated Responses	Burden Per-Response (minutes)	Total Burden (hours)
Contractors	Screening only	1,391	3	70
	Screening + Full Questionnaire	254	33	140
Lessors and Property Managers	Screening only	1,972	3	99
	Screening + Full Questionnaire	68	8	9
Building Occupants	Screening only	4,720	3	236
	Screening + Full Questionnaire	80	8	10
Summary for All Respondents	Screening only	8,083	-	-
	Screening + Full Questionnaire	402	-	-
	Total	8,485	-	564

Table 5: Revised Burden Estimates				
Questionnaire	Response Type	Estimated Responses	Burden Per-Response (minutes)	Total Burden (hours)
Contractors	Screening only	12,655	2	422
	Screening + Full Questionnaire	254	18	76
Lessors and Property Managers	Screening only	2,964	2	99
	Screening + Full Questionnaire	68	10	11
Building Occupants	Screening only	1,732	3	87
	Screening + Full Questionnaire	80	10	13
Summary for All Respondents	Screening only	17,361	-	-
	Screening + Full Questionnaire	402	-	-
	Total	17,763	-	708

V. Attachment

Revised contractor questionnaire.