

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

1. EXECUTIVE SUMMARY

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

Title: Residential Lead-Based Paint Hazards Disclosure Requirements

ICR Numbers: EPA ICR No.: 1710.08; OMB Control No.: 2070-0151

EPA Form Numbers: Seller's Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards, Lessor's Disclosure of Information on Lead-Based Paint and/or Leas-Based Paint Hazards, EPA747-K-99-001: Lead Hazard Information Pamphlet – "Protect Your Family from Lead in Your Home"

Docket ID Number: EPA-HQ-OPPT-2017-0631.

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 renewal of existing an existing ICR for EPA ICR No. 1710.07; OMB Control No. 2070-0151; entitled "Residential Lead-Based Paint Hazards Disclosure Requirements; approved through October 31, 2018.

1In proposing to renew this ICR, EPA will provide a 60-day public notice and comment period.

1(d). Abstract

This ICR will cover the information collection activities associated with the reporting and recordkeeping requirements for sellers, lessors, and their agents' disclosure activities in target housing including the allowance of up to ten days for an optional risk assessment or inspection before being obligated under purchase or lease contract.

Legal authority: Section 1018 of the Residential Lead Based Paint Hazard Reduction Act of 1992 (the Act) (42 U.S.C. 4852d) directs the Environmental Protection Agency (EPA) and the Department of Housing and Urban Development (HUD) to jointly issue regulations requiring disclosure of known lead based paint and/or lead based paint hazards by persons selling or leasing housing constructed before the phase out of residential lead based paint use in 1978. Under that authority, EPA and HUD established requirements at 40 CFR 745, Subpart F and 24 CFR 35, Subpart H. More details are provided in Unit 2(a) of this Supporting Statement.

Respondents/affected entities: Entities potentially affected by this ICR include property owners and lessors, offerors/buyers and lessees/tenants, and agents acting on behalf of offerors/buyers or owner/lessors. Following prior analyses, it is assumed there are not agents acting on behalf of the lessees or tenants.

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

Confidentiality of responses: This collection does not require the disclosure or retention of confidential information. The third party disclosure requirements also comply with the provisions of the Privacy Act of 1974 and OMB Circular A-108.

Estimated total number of potential respondents: EPA estimates that there are 604,926 Real Estate Agents, 2,700,000 private sellers, and 6,400,00 owners/lessors, for a total of 9,704,926 respondents among sellers and lessors of property. Additionally, EPA estimates that there are 5,400,000 buyers and 6,400,000 tenants, or 11,800,000 respondents among purchasers and leasers of property. There are, therefore, 21,504,926 total respondents to this information collection.

Frequency of response: On occasion.

Estimated total annual burden: 5,952,344 hours. Burden is defined at 5 CFR 1320.3(b).

Estimated total annual costs: \$ 130,067,754, includes no annualized capital investment or maintenance and operational costs.

Changes in the estimates: There is an overall decrease of 514,832 hours in the total respondent burden that is currently approved by OMB in this ICR. This decrease reflects changes in EPA's estimates of the burden including: revisions to the estimated number of respondents based on recent data sources such as the American Housing Survey, Bureau of Labor Statistics, and the National Association of Realtors; changes in the housing market and related industries, primarily housing rentals with new occupants, and changes to the cost of

materials. Further details about these changes are included in this ICR Supporting Statement. This change is an adjustment.

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.

The current regulations in 40 CFR part 745, subpart F cover the types of regulated sale and lease transactions in target housing, the disclosure requirements, and the recordkeeping requirements.

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:

Sellers of Pre-1978 Residential Housing: The rule requires that sellers of pre-1978 housing (1) provide a lead hazard information pamphlet to contract offerors, and (2) complete and attach a disclosure form to their sales contracts. A sample form is provided in the preamble to the regulations, but only the information elements are required, each respondent can develop its own form. The form must be signed by the seller, purchaser, and any agent(s) acting on behalf of the seller.

Lessors of Pre-1978 Residential Housing: The rule requires lessors of pre-1978 housing to (1) provide a lead hazard information pamphlet to lessees, and (2) complete and attach a disclosure form to their leasing contracts. Again, while a sample form is provided, each respondent is permitted to develop its own form. The form must be signed by the lessor and any agent(s) acting on behalf of the lessor. The form must then be retained by the lessor, and any agents acting on their behalf.

Agents Acting On Behalf of Sellers or Lessors: Section 1018 of the Act specifically directs EPA to require agents acting on behalf of sellers or lessors to ensure compliance with the disclosure regulations.

EPA and HUD jointly administer and enforce the rule, and have agreed to maintain a single ICR for these information collection activities. EPA will take the lead in preparing the necessary documentation for renewals.

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 third party disclosure requirements that are contained in the regulations are specifically mandated by section 1018 of the Act. The recordkeeping requirements contained in the regulations are necessary for ensuring compliance with the provisions of the regulations.

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

Owners/Occupants of target housing. The third party disclosure requirements attempt to ensure that families receive both specific information on the housing's lead history and general information on lead exposure prevention. With this information, consumers may be able to make more informed decisions concerning home purchase, lease, and maintenance to protect families from lead hazard exposure.

EPA, HUD, Local Governments. The recordkeeping requirements enable EPA and HUD, as well as tribal governments, state and local regulators and the courts, to both determine compliance and effectively enforce section 1018 and the provisions of the rule. In addition, the Act provides a private cause of action for persons harmed by violations of section 1018, and records kept pursuant to this rule may be important evidence for these parties.

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

3(a). Non-Duplication

The third party disclosure and recordkeeping requirements covered by this ICR are unique and are not in any way duplicated by another information collection activity.

3(b). Public Comments

In proposing to renew this ICR, EPA provided a 60-day public notice and comment period that ended on February 20, 2018 (82 FR 60396, December 20, 2017). EPA received one comment from the National Association of Realtors during the comment period. Copies of the public comment and of EPA's response to the public comment appear in Attachment 7.

3(c). Consultations

Additionally, under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with

potential ICR respondents and data users about specific aspects of ICRs before submitting an ICR to OMB for review and approval. In accordance with this regulation, EPA submitted questions to several interested parties via e-mail. The individuals contacted were:

Russell Riggs
National Association of Realtors
rriggs@realtors.org
(202) 383-1259

Eileen Lee
National Multi Housing Council
elee@nmhc.org
(202) 974-2326

Judy Sullivan
Government Relations Representative
National Association of Housing Cooperative
jsullivan@nahc.coop
(202) 737-0797

Gail Phillips
National Association of Residential Property Managers
gphillips@narpm.org
(800) 782-3452 x116

David E. Jacobs
National Center for Healthy Housing
djacobs@nchh.org
(410) 992-0712

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 8.

3(d). Small Entity Flexibility

The affected population for this rule is largely comprised of small entities, and all of the requirements have been crafted to maximize flexibility. EPA and HUD have also developed guidance and a sample form to further facilitate and assist small entities with compliance.

3(e). General PRA Related Guidelines

This ICR is consistent with OMB's General Guidelines for information collections under the PRA. Although no form is imposed by the regulations, to facilitate and simplify compliance EPA and HUD provide a sample form for respondents to adopt or modify for their use. Since this form is simply a sample, it does not contain a PRA Notice, OMB number or expiration date. Agents are assumed to retain one sheet of paper containing a signed disclosure and acknowledgement statement per each sale or rental transaction.

3(f). Confidentiality

This collection does not require the disclosure or retention of confidential information. The third party disclosure requirements also comply with the provisions of the Privacy Act of 1974 and OMB Circular A-108.

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

The primary purpose of this information collection activity is the provision of certain information between two parties in a transaction, i.e., third party disclosure. The agencies are therefore primarily engaged in the following basic activities:

- Public outreach to assist in the understanding of, and compliance with, the rule requirements
- The development and maintenance of an infrastructure for receiving tips and complaints regarding alleged violations of the regulations
- Compliance monitoring and enforcement of the provisions in the regulation

4(b). Estimated Agency Costs

The primary purpose of this information collection activity is the provision of certain information between two parties in a transaction, and constitutes a third-party disclosure under the PRA. The Agency burden and costs associated with this activity are, therefore, limited to the provision of guidance and program oversight or enforcement. As such, there is no need to estimate the related Agency burden and costs under the PRA.

4(b)(i). Collection Schedule

The third party disclosure is transaction specific and only occurs when the regulated entities are engaged in a specific transaction, i.e., the sale or lease of target housing.

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. However, due to the requirements outlined in this ICR, electronic submissions are not generally applicable as submissions are not required to the Agency. Responses to consultations can be sent via electronic mail or other means by preference of the respondent.

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 third party disclosure requirements specify the communication and recordkeeping for agents and individuals undertaking the purchase, sale, or rental of a target housing unit.

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

5312	Real Estate Agents
5311	Lessors of Real Estate

5(b).

IC #1: Agent Start-up, Disclosure and Record Preparation, Recordkeeping and Materials Burden

Respondent NAICS Codes

5312	Real Estate Agents
5311	Lessors of Real Estate

Information Collection Activities

The start-up burden involves the time and cost required for agents to learn the disclosure rule's requirements and set up procedures for meeting those requirements. EPA estimates that the paperwork burden related to learning the rule and setting up compliance procedures is one hour. This estimate assumes real estate sales agents, sellers of rental property, and property managers only incur this start-up burden once, when they initially enter the profession. Since the rule's initial year has passed, the calculation assumes each year has an average number of new entrants incurring the start-up costs in their first year.

The disclosure record preparation burden involves the time and cost for performing the disclosure activities in conjunction with the sale or rental of target housing as specified by the rule. Each instance is estimated to take five minutes for each of the parties. For each sale handled by an agent on the seller's side, the agent is expected to explain the rule to the seller. For each offer in each sale handled by an agent on the offeror's side, the agent is expected to explain the rule to the offeror. Thus for each sale without an agent the analysis assumes a total burden of twenty minutes (five minutes on each of two sides, for two offers), and a total burden of thirty-five minutes when the sale has an agent for each offeror and for the seller (twenty minutes plus five minutes for each of three agents).

The record-keeping provisions of this rule require the seller and the selling agent (or in the case of rentals, both the owners/lessors and their agents) maintain records of the signed

disclosure. The record-keeping requirement causes them to spend time in filing the specified documents. In all likelihood, some type of filing system already exists for each party. The incremental filing time that may reasonably be attributed to the disclosure rule itself should be very small, or approximately 0.5 minutes (0.0083 hours) per record.

The materials burden involves the cost of materials required for rule compliance. Materials costs include the lead hazard information pamphlets, filing materials, and copies to be made. The sellers and lessors may choose to provide these materials themselves or to have their agents manage these materials. But for simplicity, this analysis assumes that these costs are borne by the principals, the sellers and the lessors.

It is assumed that there is one copy of a signed acknowledgment and disclosure statement for every offer or rental contract. It is assumed that each statement will require no more than one side of a single sheet of paper. For sales and rentals involving an agent, three sets of the contract must be generated by the agent (one for the buyer/lessee, one for the seller/lessor and one for the agent) for a total of three copies. Sales transactions will also require a one-page lead-based paint inspection contingency clause for each party. Those are not required for rentals. This analysis assumes two offers per sale. Copy costs are assumed to be an average of \$0.08 per page, the standard price per page at copy centers for black and white copies (September 2017). Not all sales transactions will involve two agents since 11 percent of sellers and 12 percent of offerors each are assumed to not use an agent. Of the percentage of sales not involving two agents, half the sales are assumed to occur with no agents and half are assumed to occur with one agent. A similar assumption was not made for rental transactions because only owner/lessors are assumed to use agents and all tenants are acting on their own behalf.

Filing-related material costs include the cost of storing the signed disclosure and acknowledgment statements that result from a completed transaction. Filing costs for individual buyers and sellers and owners and renters are considered a negligible incidental expense. The filing costs are assumed to apply only for agents. For filing materials, it is assumed a four-drawer, 26.5-inch deep filing cabinet can hold 26,500 sheets of paper and costs approximately \$250 (average price at large office supply stores, September 2017). This translates into a \$0.009 cost per sheet of paper which was rounded to an even \$0.01. For each sale or rental transaction, agents are assumed to retain one sheet of paper containing a signed disclosure and acknowledgment statement.

IC# 1. Agent Start-up, Disclosure and Record Preparation, Recordkeeping, and Material Burden					
Citation: 40 CFR 745, subpart F					
Data Element	Form	Responses	Burden (hours)	Materials	Cost (\$)
Start-up Burden Real Estate Agents	N/A	22,111	22,111	N/A	829,605
Start-up Burden Lessor Agents	N/A	55,762	55,762	N/A	1,723,046
Disclosure and Record Preparation for Seller Agents (89%)	Disclosure Form	2,403,000	200,250	N/A	7,513,380
Disclosure and Record Preparation for Offeror Agents (88% x 2)	Disclosure Form	4,752,000	396,000	N/A	14,857,920

Disclosure and Record Preparation for Owner/Lessor Agents (88%)	Disclosure Form	5,632,000	469,333	N/A	14,502,400
Recordkeeping for Seller Agents (89%)	N/A	2,403,000	19,945	N/A	748,333
Recordkeeping for Owner/Lessor Agents (88%)	N/A	5,632,000	46,746	N/A	1,444,439
<i>Subtotal</i>		<i>20,899,873</i>	<i>1,210,147</i>		<i>\$41,619,122</i>
Material Burden					
Pamphlets for Sales (89% x 2)	EPA747-K-99-001	N/A	N/A	4,806,000	3,460,320
Pamphlets for Rentals (88%)	EPA747-K-99-001	N/A	N/A	5,632,000	4,055,040
Copied Pages for Sales with 1 Agent (5.5%)	N/A	N/A	N/A	1,485,000	118,800
Copied Pages for Sales with 2 Agents (89%)	N/A	N/A	N/A	28,836,000	2,306,880
Copied Pages for Rentals with Agents (88%)	N/A	N/A	N/A	22,528,000	1,802,240
Filed Pages for Sales with 1 Agent (5.5%)	N/A	N/A	N/A	148,500	1,485
Filed Pages for Sales with 2 Agents (89%)	N/A	N/A	N/A	4,806,000	48,060
Filed Pages for Rentals with Agents (88%)	N/A	N/A	N/A	5,632,000	56,320
<i>Subtotal</i>					<i>\$11,849,145</i>
Grand Total		20,899,873	1,210,147		\$53,468,267

IC #2: Individual Start-up, Disclosure and Record Preparation, Recordkeeping and Materials Burden

Respondent NAICS Codes

None, this IC captures burden and cost estimates for sellers, offerors, and tenants therefore no NAICS code applies.

Information Collection Activities

The start-up burden involves the time and cost required for individuals to learn the disclosure rule's requirements and set up procedures for meeting those requirements. EPA estimates that the paperwork burden related to learning the rule and setting up compliance procedures is one hour. Each seller is assumed to incur the start-up burden.

The disclosure record preparation burden involves the time and cost for performing the disclosure activities in conjunction with the sale or rental of target housing as specified by the rule. Each instance is estimated to take five minutes for each of the parties. For each sale handled by an agent on the seller's side, the agent is expected to explain the rule to the seller. For each offer in each sale handled by an agent on the offeror's side, the agent is expected to explain the rule to the offeror. Thus for each sale without an agent the analysis assumes a total burden of twenty minutes (five minutes on each of two sides, for two offers), and a total burden of thirty-five minutes when the sale has an agent for each offeror and for the seller (twenty minutes plus five minutes for each of three agents).

The record-keeping provisions of this rule require the seller and the selling agent (or in the case of rentals, both the owners/lessors and their agents) maintain records of the signed disclosure. The record-keeping requirement causes them to spend time in filing the specified documents. In all likelihood, some type of filing system already exists for each party. The incremental filing time that may reasonably be attributed to the disclosure rule itself should be very small, or approximately 0.5 minutes (0.0083 hours) per record.

The materials burden involves the cost of materials required for rule compliance. Materials costs include pamphlets and copies provided by sellers or lessors who do not use agents. It is assumed that there is one copy of a signed acknowledgment and disclosure statement for every offer or rental contract. It is assumed that each statement will require no more than one side of a single sheet of paper. For sales and rentals involving an agent, three sets of the contract must be generated by the agent (one for the buyer/lessee, one for the seller/lessor and one for the agent) for a total of three copies. Sales transactions will also require a one-page lead-based paint inspection contingency clause for each party. Those are not required for rentals. This analysis assumes two offers per sale. Copy costs are assumed to be an average of \$0.08 per page, the standard price per page at copy centers for black and white copies (September 2017). Not all sales transactions will involve two agents since 11 percent of sellers and 12 percent of offerors each are assumed to not use an agent. Of the percentage of sales not involving two agents, half the sales are assumed to occur with no agents and half are assumed to occur with one agent. A similar assumption was not made for rental transactions because only owner/lessors are assumed to use agents and all tenants are acting on their own behalf.

IC# 2. Seller, Offeror, and Tenant Disclosure and Record Preparation, Recordkeeping, and Material Burden					
Citation: 40 CFR 745, subpart F					
Data Element	Form	Responses	Burden (hours)	Materials	Cost (\$)
Start-up Burden Sellers	N/A	2,700,000	2,700,000	N/A	42,930,000
Disclosure and Record Preparation for Sellers (x 2)	Disclosure Form	5,400,000	450,000	N/A	7,155,000
Disclosure and Record Preparation for Offerors (x 2)	Disclosure Form	5,400,000	450,000	N/A	7,155,000
Disclosure and Record Preparation for Owners/Lessors	Disclosure Form	6,400,000	533,333	N/A	8,480,000
Disclosure and Record Preparation for Tenants	Disclosure Form	6,400,000	533,333	N/A	8,480,000
Recordkeeping for Sellers	N/A	2,700,000	22,410	N/A	356,319
Recordkeeping for Owner/Lessors	N/A	6,400,000	53,120	N/A	844,608
<i>Subtotal</i>		35,400,000	4,742,197		\$75,400,927
Material Burden					
Pamphlets for Sales, No Agent (11% x 2)	EPA747-K-99-001	N/A	N/A	594,000	427,680
Pamphlets for Rentals, No Agent (12%)	EPA747-K-99-001	N/A	N/A	768,000	552,960
Copied Pages for Sales without Agents (5.5%)	N/A	N/A	N/A	1,188,000	95,040
Copied Pages for Rentals without Agents (12%)	N/A	N/A	N/A	1,536,000	122,880
<i>Subtotal</i>					\$1,198,560
Grand Total		35,400,000	4,742,197		\$76,599,487

5(c). Total Estimated Respondent Burden and Costs

IC Summary Table			
IC Category	Responses	Burden (hours)	Cost (\$)
IC 1: Real Estate and Lessor Agents	20,899,873	1,210,147	53,468,267
IC 2: Individuals	35,400,000	4,742,197	76,599,487
Total	56,299,873	5,952,344	\$130,067,754

6. PRA BURDEN STATEMENT

Under the PRA, burden is defined at 5 CFR 1320.3(b).

The annual public burden for this collection of information, which is approved under OMB Control No. 2070-0151, is estimated to average about 0.11 hours per response. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a current and 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 burden from the previously approved ICR was 6,467,176 hours. The total burden requested for this ICR is 5,952,344 hours, or a decrease of 514,832 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 updates to data sources such as the American Housing Survey, Bureau of Labor Statistics, and the National Association of Realtors; and
- Revisions based on market factors. There was a decrease in new rentals of nearly two million compared with the previous ICR. And a decrease in the amount of owner-occupied target housing in the market, so while sales have begun to rebound since the slump in the housing market, sales of target housing actually had a slight decrease. The percent of owner-occupied target housing stock during the previous ICR was 54.1 percent, for this ICR it is 50.2 percent. This change in stock percentage is expected as older houses are torn down and as new houses are built and enter the market.

The total combined cost burden of the previously approved ICR was \$125,683,576. The total cost burden requested for this ICR is \$130,067,754. The difference of \$4,384,178 between the current cost burden request and the previously approved requests is 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 2016 dollars for this information collection request. In all, wage rates have increased. And while increases to material costs are minimal on a per-unit basis, once aggregated over millions of responses, it causes a noticeable increase in the overall cost of the ICR.

Due to the volatility in the housing sales and rental markets, EPA considered the potential impact on estimated paperwork burden and cost if the sales or rentals were five percent greater than or five percent less than projected in the Supporting Statement. The total burden and cost could not simply be increased or decreased by five percent because not all burden and cost estimates are impacted by either sales or rentals. For example, the number of new entrants for Real Estate Agents is based on growth in the NACIS code, not on the number of sales or leases. Also while sales and rental trends of housing are related, there is not always a one-to-one relationship; therefore, the increases and decreases were calculated separately instead of together.

A five percent change in housing sales results in the target housing changing by 130,000 units, creating a range from 2.6 million housing units to 2.87 million housing units. The Supporting Statement assumed target housing sales were 2.74 million units. Total burden in the Supporting Statement was an estimated 5,952,344 hours at a cost of \$130,067,754. The five percent change would result in a change of 230,000 hours and \$4.8 million dollars. The total burden would range from 5,722,344 to 6,182,344 hours and the cost from \$125,267,754 to \$134,867,754. These ranges were calculated assuming no change in the rental estimate presented in the Supporting Statement.

A five percent change in target housing rentals results in a change of 400,000 units, creating a range from 6.1 million units to 8.7 million units. The Supporting Statement assumed new housing rentals were 6.4 million units. Total burden in the Supporting Statement was an estimated 5,952,344 hours at a cost of \$130,067,754. The five percent change would result in a change of 130,000 hours and \$2.95 million dollars. The total burden would range from 5,822,344 to 6,082,344 hours and the cost from \$127,117,754 to \$133,017,754. These ranges were calculated assuming no change in the sales estimate presented in the Supporting Statement.

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-2017-0631**. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described in the following listing.

- Attachment 1:** **42 USC 4852d - Residential Lead-Based Paint Hazard Reduction Act of 1992, Section 1018.** Also available online at the U.S. House of Representatives' [US Code website](#).
- Attachment 2:** **40 CFR part 745, Subpart F - Disclosure of Known Lead Based Paint and/or Lead Based Paint Hazards Upon Sale or Lease of Residential Property.** Also available online at the National Archives and Records Administration's [Electronic CFR Website](#).
- Attachment 3:** **24 CFR part 35, Subpart H - Project-Based Assistance.** Also available online at the National Archives and Records Administration's [Electronic CFR Website](#).
- Attachment 4:** **Seller's Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards (Sample Form).** Also available online at <http://www2.epa.gov/lead/sellers-disclosure-information-lead-based-paint-andor-lead-based-paint-hazards>.
- Attachment 5:** **Lessor's Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards (Sample Form).** Also available at online at <http://www2.epa.gov/lead/lessors-disclosure-information-lead-based-paint-andor-lead-based-paint-hazards>.
- Attachment 6:** **Lead Hazard Information Pamphlet - "Protect Your Family from Lead In Your Home" (EPA747-K-99-001).** Also available at online at <http://www2.epa.gov/lead/protect-your-family-lead-your-home>.