

Supporting Statement for a Request for OMB Review under the Paperwork Reduction Act

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.: 2507.03; OMB Control No.: 2070-0195.

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-2017-0692.

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 an existing, approved ICR. This renewal ICR also includes, by consolidation, the information collection activities that are currently approved by OMB in the following ICR: OMB Control No. 2070-0192; EPA ICR 2502.02; entitled "Final Rule: Lead-

based Paint Programs; Amendment to Jurisdiction-Specific Certification and Accreditation Requirements and Renovator Refresher Training Requirements.

1(d). Abstract

This ICR renewal 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 (LBP) activities or renovations of target housing and child-occupied facilities (COFs); training providers; and states/territories/tribes/Alaskan native villages.

Legal authority: The Toxic Substances Control Act (TSCA) Title IV, 15 U.S.C. 2681 et seq. In particular, sections 401 (15 U.S.C. 2681), 402 (15 U.S.C. 2682), 404 (15 U.S.C. 2684), and 406 (15 U.S.C. 2686); 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 LBP activities and/or perform renovations of target housing or COFs for compensation, dust sampling, or dust testing; or who perform LBP inspections, lead hazard screens, risk assessments or abatements in target housing or COFs; 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 LBP 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: 770,564.

Frequency of response: On occasion.

Estimated total annual burden: 5,251,320 hours. Burden is defined at 5 CFR 1320.3(b).

Estimated total annual costs: \$ 303,099,637, includes no annualized capital investment or maintenance and operational costs.

Changes in the estimates: There is an overall decrease of 1,211,977 hours in the total estimated combined respondent burden that is currently approved by OMB in this ICR. The difference between the current burden request and the previously approved request 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; and

- Revisions based on market factors.

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 (unless any child who is less than 6 years of age resides or is expected to reside in such housing).

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 LBP 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 COFs. The current regulations in 40 CFR part 745, subpart L, cover inspections, lead hazard screens, risk assessments, and abatement activities (referred to as “LBP activities”) performed in target housing and COFs. 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 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 COFs 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 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 COFs, the rule requires firms to provide the building owner and adult representative of the COF 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 (see Attachment 11 for an example). 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. EPA's 2011 rule regarding clearance testing for the renovation, repair, and painting program (Clearance Final Rule, 76 FR 47918, Aug. 5, 2011) 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 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 LBP activities in target housing or COFs 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 who wish to perform renovations in target housing or COFs acquire certification once they complete a renovator course and pass a final exam.

Individuals certified to perform LBP 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). Renovators will need to complete a renovator refresher course every 3 or 5 years, depending on whether or not their previous course had a hands-on component. Renovators who take a refresher course online recertify every 3 years, while those who take an in-person course must recertify after 5 years. The rule also requires individuals to develop records of the LBP 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). Training providers who wish to

provide LBP training online must apply for an additional accreditation. This requires the submission of an application, supporting materials (including access to the online curriculum) along with the required fee. An expedited process is available if a trainer is seeking to provide E-learning training for a discipline they are already accredited to teach in person. This expedited process is only available if the trainer is using an E-learning curriculum already approved by EPA. An expedited application requires a cover letter; a training provider application to amend their accreditation; and an online course quality control (QC) plan that addresses the required E-learning course specifications.

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 are required to notify the EPA (i) prior to providing training courses, and (ii) following completion of training courses. These notification requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information to track compliance activity and to prioritize inspections. Training programs must apply for re-accreditation every four years.

States: Under TSCA section 404, EPA must review and assess state submissions to determine whether to grant authorization to administer the LBP 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 LBP 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 LBP 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 COFs, COF operators, and parents/guardians. The owner/occupant of target housing or a COF must be provided with a lead hazard information pamphlet before any renovation commences. If the COF is not operated by the owner of the building, an adult representative of the COF must also be provided with a lead hazard information pamphlet. Parents and guardians of children using COFs 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, COF operators, and parents or guardians to take appropriate precautions to minimize the exposure of children to LBP 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 LBP hazards created by renovations.

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

EPA. This information collection provides the EPA with materials necessary to authorize state renovation and LBP activities programs and to serve as the accrediting and certifying body in states without authorized programs (discussed further below).

EPA/States. This collection enables the EPA/states to determine compliance with and enforce the requirements for training, certification, accreditation, and work practice standards for renovations and LBP 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 LBP 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 LBP 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 LBP 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 COFs.

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 October 1, 2018 (83 FR 36926, July 31, 2018). EPA received 1 comment during the comment period from the National Association of Home Builders (see Attachment 12). EPA's response to the public comment is presented in Attachment 13. In summary, NAHB requested that EPA standardize the sample recordkeeping checklist and establish standardized protocols for checklist completion to help renovators understand how the recordkeeping requirements may be satisfied. EPA received a similar comment in response to a previous rulemaking, in which the recordkeeping checklist was updated (Opt-Out Final Rule, 75 FR 24802, at 24808, May 6, 2010). At that time, EPA disagreed with the comment and reinforced the Agency's interest in giving renovation firms flexibility with regard to how to present the required information to owners and occupants. Renovation firms must list the information specified in the regulations and they can use EPA's sample checklist if they choose. However, EPA regulations permit firms to use their own version of the checklist as long as it includes the required information. EPA continues to disagree that a standardized recordkeeping checklist is needed, and maintains its belief that firms should have the flexibility to use their own version of the checklist provided that it presents the required information.

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:

Kary Amin NOVA Environmental, Inc. 734-930-0995 information@nova-env.com	Andrew McLellan Environmental Education Associates 888-436-8338 ajm@environmentaleducation.com
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Vince Butler BBC Builders 703-878-3300 mail@bbcbuilders.com	Mike Nagel Men at Work Chicago 847-359-3591 mike@MAWchicago.com
Kevin Gaul Pella Corporation 641-621-1000 GaulKJ@Pella.com	Rocky Everly Milwaukee Lead/Asbestos Info Center, division of Midwest Certified Training Inc. 608-318-2266 rocky@mlic.com
Bob Hanbury House of Hanbury Builders Inc 860-666-1537 Bobh@houseofhanbury.com	Mark Mikkelson Andersen Windows 651-264-5150 mark.mikkelson@andersencorp.com
Jeff Smith JT Smith Companies 503-657-3402 jtsmith@jtsmithco.com	

EPA received no responses to its solicitation for consultations. A copy of EPA's consultation e-mails to the above potential respondents is included in Attachment 14.

3(c). Effects of Less Frequent Collection

Due to the nature of the renovation and LBP activities regulations and their related information collection activities, each activity is a separate and unique event requiring specific notification and documentation. Therefore, achieving less frequent collection would require revising the regulations that require those events. Under the renovation and LBP activities regulations, individuals and firms 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 LBP activity and renovation course EPA's final rule in 2016 (Lead-based Paint Programs: Amendment to Jurisdiction-Specific Certification and Accreditation Requirements and Renovator Refresher Training Requirements Final Rule, 81 FR 7987, Feb. 17, 2016) revised the renovator training notification requirements to require notifications less frequently for renovator refresher trainings without a hands-on component, and therefore resulted in less frequent information collection activities. Program approval for states is a one-time activity, although there is ongoing reporting. EPA believes further revisions to regulations that would result in less frequent collection are not appropriate at this 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.

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 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 rule for renovation, repair, and painting (RRP) program (RRP Final Rule, 78 FR 21692, April 22, 2008), 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 RRP final 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 406(b) 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 Clearance final rule requires training providers to maintain records of renovation and dust sampling technician training courses for five years, because five years is the length of the refresher training cycle for certified renovators and dust sampling technicians.

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 is performing the following activities in response to the submittals related to RRP and LBP 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 \$3,950,086 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 activities 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).

EPA makes use of existing technology to simplify the application and notification processes where available. EPA receives the majority of notifications through EPA's Central Data Exchange (CDX), but also allows notification through the more traditional methods (via fax, mail, commercial delivery service, or hand delivery). In addition, lead abatement firms, evaluation firms, individuals, and renovation firms typically apply for certification and re-certification via CDX.

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.

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;

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

- Training programs must amend their applications when information changes;
- Training programs must seek re-accreditation at four-year intervals following initial accreditation;
- Training programs submit notification of training to EPA before each course, except for renovator refresher training courses without a hands-on component;
- Training programs submit post-training notification to EPA after each course, except post-training notifications for renovator refresher training courses without a hands-on component can be submitted once a month;
- Firms may apply for certification at any time;
- Firms must amend their applications when information changes;
- Certified 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 must take refresher training every 3 or 5 years, depending on whether or not their previous course had a hands-on component. Renovators taking the 4-hour refresher training course are not required to perform hands-on activities every time they are trained.
- 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;
- LBP 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 LBP activities.

EPA believes that receipt of notification of five and seven business days respectively prior to conducting LBP 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. 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 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. The EPA receives approximately 90 percent notifications through EPA's Central Data Exchange (CDX), but also allows notification through the more traditional methods (via fax, mail, commercial delivery service, or hand delivery). In addition, training providers, firms, and lead abatement individuals typically 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 LBP activities and RRP regulations specify reporting and recordkeeping for training providers and individuals/firms undertaking LBP activities and/or renovations in target housing and COFs.

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 activities 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 LBP activities, training providers must submit the following documents to the EPA/states electronically using EPA's Central Data Exchange (CDX) or using the form entitled either the sample EPA Form 8500-25, entitled "Accreditation Application for Training Programs" (see Attachment 3).

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 LBP activity training, training providers must provide notification to the EPA, using EPA's CDX or the sample form entitled "Lead-Based Paint Activities and Renovation Training Notification" (see Attachment 6). (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 LBP activities training providers must provide notice using EPA's CDX system to submit the information electronically or the sample form entitled "Lead-Based Paint Activities and Renovation Post-Training Notification" (see Attachment 7).

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							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
LBP activity training providers / initial accreditation / reporting	8500-25	9 4	94	2,566	159,36 3	-	159,36 3
LBP activity training providers / renewal accreditation / reporting	N/A	22 4	2 24	1,193	73,2 05	-	73,2 05
LBP activity training providers / pre-training notification / reporting	Training Notification	56 5	3,9 55	791	46,0 90	602	46,6 92
LBP activity training providers / pre-training re-notification / reporting	N/A	56 5	1,6 95	339	19,7 53	258	20,0 11
LBP activity training providers / post-training notification / reporting	Post-Training Notification	56 5	2,2 60	1,356	90,9 74	344	91,3 18
LBP training providers / recordkeeping	8500-25	56 5	5 65	169	6,8 72	6	6,8 78
LBP Training Provider CDX registration and usage		42 4	4 24	1,060	71,1 15	-	71,1 15
Total		565	9,217	7,474	\$ 467,373	\$ 1,210	\$ 468,583

IC #2: LBP activity firm certification activities

Respondent NAICS Codes

562910 Remediation Services

Information Collection Activities

To obtain firm certification to perform LBP activities in target housing or COFs, 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. LBP activities firms must be recertified every three years.

Firms seeking certification for LBP activities must perform the following activities:

- Read the regulation
- Submit an application
- Retain Records of individuals that conduct LBP 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							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
LBP activity firms / initial certification / reporting	EPA Form 8500-27	2,488	2,488	18,660	1,239,380	498	1,239,878
LBP activity firms / renewal certification / reporting	EPA Form 8500-27	1,571	1,571	2,357	150,194	314	150,509
LBP firms / certification / recordkeeping	EPA Form 8500-27	4,059	4,059	41	1,288	16	1,329
LBP firms CDX registration and usage		3,044	3,044	7,610	510,555	-	510,555
Total		4,059	11,162	28,667	\$ 1,901,418	\$ 828	\$1,902,270

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

Respondent NAICS Codes

562910 Remediation Services

Information Collection Activities

Individuals who wish to perform LBP activities in target housing or COFs 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 LBP 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 LBP activities 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							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
Individuals performing LBP abatement activities; certification and accreditation / reporting and recordkeeping & CDX registration	EPA 747-B-99-002	8,882	8,882	24,046	\$1,086,804	\$ -	\$ 1,086,804

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 LBP 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 LBP 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							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
LBP activity firms / evaluation reports / reporting	EPA Form 8500-27	12,918	206,688	375,138	25,168,025	62,006	25,230,031
LBP activity firms / post-abatement report / reporting	Sample Renovation Recordkeeping Checklist	12,918	12,918	2,4867	1,668,334	3,875	1,672,209
LBP activity firms / occupant protection	None	12,918	12,918	1,949	801,665	3,875	805,541

plan / reporting							
LBP activity firms / pre-abatement notifications / reporting	Notification of Lead-Based Paint Abatement Activities	12,918	12,918	5,490	368,331	3,326	371,657
LBP firms / reports / recordkeeping	Notification of Lead-Based Paint Abatement Activities, Sample Renovation Recordkeeping Checklist	12,918	245,442	2,454	-	2,454	2,454
LBP activity firms / pre-abatement re-notifications / reporting	Notification of Lead-Based Paint Abatement Activities	211	211	43	2,902	54	2,957
LBP Firms / re-notifications / recordkeeping	Notification of Lead-Based Paint Abatement Activities	211	211	2	-	2	2
Total		12,918	491,306	419,944	28,009,257	75,594	28,084,851

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 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							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
RRP training providers / initial accreditation / reporting	EPA Form 8500-25	4 6	46	1,270	78,673	-	78,673

RRP training providers / reaccreditation / reporting	None	11 2	1 12	1,0 53	65, 089	-	65,089
Accredited Cohort Rule Familiarization Maintenance	None	40 0	3 29	8 00	53, 672	-	53,672
RRP training providers / pre-training notification / reporting	Training Notification	55 8	7,8 12	1,5 62	96, 012	785	96,797
RRP training providers / pre-training re-notification / reporting	Training Notification	55 8	1,1 16	2 23	13, 716	112	13,828
RRP training providers / post-training notification / reporting	Post-Training Notification	55 8	7,8 12	4,6 87	314, 464	785	315,249
RRP training providers / recordkeeping	EPA Form 8500-25	46 9	5 58	1 27	5, 689	6	5,694
CDX Registration & Usage		46 9	4 67	1,1 73	78, 663	-	78,663
Total		55 8	18,2 52	10,8 95	705, 979	1,688	707,667

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 LBP renovations in target housing or COFs 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).

IC# 6. Private RRP firm certification activities							
Citation: 40 CFR 745							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
Private RRP firms / initial certification / reporting	None	32,961	32,961	115,364	6,522,652	20,106	6,542,759
Private RRP firms /recertification / reporting	None	16,456	16,456	32,912	1,860,844	10,038	1,870,883
Certified Cohort Rule Familiarization Maintenance	None	88,780	88,780	88,780	5,019,621	-	5,019,621
RRP firms / certification / recordkeeping	None	49,417	49,417	494	15,685	494	16,179
CDX Registration & Usage	None	41,510	41,510	103,776	7,417,887	-	7,417,887
Total		88,780	229,124	341,325	20,836,690	30,639	20,867,329

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 and post-renovation checklists documenting lead-safe work practices - residential facilities							
Citation: 40 CFR 745 Subpart E							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
Pre-Renovation Information Dissemination by Contractors Working in Occupied Target Housing Rental Units	None	208,547	1,376,410	386,771	21,868,047	1,789,333	23,657,381
Pre-Renovation Information Dissemination by Contractors Working in Owner-Occupied Target Housing	None	208,547	4,191,795	762,907	43,134,741	5,449,333	48,584,074
Pre-Renovation Information Dissemination by Contractors Working in Vacant Target Housing Rental Units and Common Areas	None	208,547	4,170,940	1,105,299	62,493,611	5,422,222	67,915,833
Pre-Renovation Information Dissemination by Contractors Working in Owner-Occupied COFs and by Landlords Working in Rental COFs	None	16,367	114,569	30,361	1,716,599	148,940	1,865,538
Pre-Renovation Information Dissemination by Contractors Working in Rental COFs	None	3,069	6,138	2,271	128,406	15,959	144,365

RRP firm checklist / owner-occupied target housing / third party disclosure	Sample Renovation Recordkeeping Checklist	208,547	5,839,316	291,966	16,507,746	686,960	17,194,707
RRP firm checklist / renter-occupied target housing / third party disclosure	Sample Renovation Recordkeeping Checklist	208,547	6,256,410	312,821	17,686,871	1,472,058	19,158,929
RRP firm checklist / in-house or landlord / third party disclosure	Sample Renovation Recordkeeping Checklist	29,441	29,441	1,472	83,230	2,944	86,174
RRP firm checklist / owner-occupied COF, contractor / third party disclosure	Sample Renovation Recordkeeping Checklist	208,542	208,542	10,427	589,548	20,854	610,402
RRP firm checklist / renter-occupied COF, contractor / third party disclosure	None	9,814	9,814	491	27,744	2,944	30,688
RRP Firms / recordkeeping / recordkeeping	Sample Renovation Recordkeeping Checklist	208,547	208,547	1,001,026	40,821,824	2,453	40,824,277
Total		208,547	22,411,922	3,905,811	205,058,368	15,014,001	220,072,369

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 COFs 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# 9. Government-employed RRP professional certification activities, distribution of lead hazard information pamphlet prior to renovation activities in public schools and post-renovation checklists documenting lead-safe work practices, and recordkeeping							
Citation: 40 CFR 745							
Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
Initial Certification		1,389	1,389	4,862	326,158	847	327,005
Renewal Certification		1,597	1,597	8,624	578,571	974	579,545
Government entities / recordkeeping	None	6,670	6,670	32,016	2,637,158	67	2,637,158
Government entities / in-house or landlord / third party disclosure	None	6,670	53,360	2,668	178,996	69,368	248,364
Pre-Renovation Information Dissemination by Schools for In-House Renovation Activities	None	7,718	36,275	7,255	486,733	47,157	533,890
Pre-Renovation Information Dissemination by Private Schools and Daycare Centers for In-House Renovation Activities	None	17,836	24,970	4,994	282,365	32,462	314,827
Total		24,044	99,291	55,424	4,489,981	150,875	4,640,789

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, except for the RRP refresher training without a hands-on component, which would not have applicable travel time.

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

IC# 9. RRP & LBP training class time dedicated to recordkeeping

Data Element	Form	Respondents	Responses	Burden	Labor Cost	M & O Cost	Total Cost
RRP Training	None	30,947	30,947	303,281	17,147,485	-	17,147,485
LBP Abatement Worker	None	912	912	23,530	959,537	-	959,537
LBP Abatement Supervisor	None	536	536	18,117	1,024,324	-	1,024,324
LBP Project Designer	None	8	8	78	5,604	-	5,604
LBP Risk Assessor	None	480	480	8,544	483,078	-	483,078
LBP Inspector	None	560	560	14,448	618,808	-	618,808
RRP Training Refresher	None	12,124	12,124	70,319	3,975,848	-	3,975,848
RRP Training Refresher - No Hands On	None	915	915	1,830	103,468	-	103,468
LBP Abatement Worker Refresher	None	245	245	2,401	97,913	-	97,913
LBP Abatement Supervisor Refresher	None	340	340	3,332	188,391	-	188,391
LBP Project Designer Refresher	None	10	10	98	7,005	-	7,005
LBP Risk Assessor Refresher	None	395	395	3,871	218,866	-	218,866
LBP Inspector Refresher	None	295	295	2,891	123,822	-	123,822
Total		47,767	47,767	452,740	24,954,148	-	24,954,148

5(c). Total Estimated Respondent Burden and Costs

IC Summary Table				
IC Category	Respondents	Responses	Burden	Cost
IC 1: LBP Training Providers	565	9,217	7,474	468,583
IC 2: LBP firm activities	4,059	11,162	28,667	1,902,270
IC 3: LBP individual activities	8,882	8,882	24,046	1,086,804

IC 4: LBP Reports, Plans, Notifications and Recordkeeping	12,918	491,306	419,944	28,084,851
IC 5: RRP Training Providers	558	18,252	10,895	707,667
IC 6: RRP Firm Activities	88,780	229,124	341,325	20,867,329
IC 7: RRP Pamphlet and Checklists	208,547	22,436,892	3,910,805	220,387,196
IC 8: RRP Government Firms	24,044	99,291	55,424	4,640,789
IC 9: RRP & LBP Training Class time	47,767	47,767	452,740	24,954,148
Total	396,120	23,351,893	5,251,320	303,099,637

6. PRA Burden Statement

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

This information collection is a renewal of previously approved EPA ICR No. 2507.01 (OMB Control No. 2070-0195) and incorporates revisions to the previous ICR which occurred due to the finalization of the Minor Amendments Rule. The total from the previously approved ICR was 6,463,297 hours. The total burden requested for this ICR is 5,251,320 hours, or a decrease of 1,211,977 hours from the previous total burden. This represents a decrease of 19 percent in the total burden hours. 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.; and
- Revisions based on market factors.

While some changes in burden may be a result of changes within the housing renovation market, by far the changes in burden are driven by changes in the number of respondents. Specifically, the decrease in burden is a result of decreases in the number of respondents in the RRP program. Primarily decreases are found in the number of certified renovators performing lead renovation activities. In the previous ICR, the number of renovators used came from estimates used in the Lead Minor Amendments Final Rule. Calculations for this ICR renewal used numbers reported in EPA's FLLP database for Private RRP firm certification activities (IC #6) which resulted in a burden decrease of approximately 50 percent (484,000 burden hours to 229,124 burden hours). Also, the number of respondents attending training classes decreased by a marked amount, with RRP & LBP training class time dedicated to recordkeeping (IC #9) decreasing from a burden of 102,719 hours to 47,767 hours (approximately 50 percent decrease). EPA determined that the previous ICR significantly overestimated the number of respondents engaging training activities. Despite this overestimate, EPA is not aware of a shortage of certified renovators or firms; certified

renovators and firms are in a staggered, periodic refresher training/recertification mode following the initial certification effort.

The total combined cost burden from the previously approved ICR was \$315,179,997. The total cost burden requested for this ICR is \$303,099,637, a decrease of \$12,080,360. 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 2016 dollars for this information collection request. In certain disciplines, wage rates actually decreased for calculations in the previous ICR, likely due to the depressed housing market and overall economy. However, wage rates in these industries have begun to recover from the drop in the housing market so while the burden in many ICs decreased, cost did not always decrease by the same proportion due to the increase in industry wages.

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-2017-0692**. 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) Title IV, 15 U.S.C. 2681 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
- Attachment 11:** Sample Pre-Renovation Disclosure Form
- Attachment 12:** National Association of Home Builders. Comment Re: Agency Information Collection Activities; Proposed Renewal of an Existing Collection (EPA ICR No. 2507.02); Comment Request. October 1, 2018.
- Attachment 13:** EPA. Memorandum response to public comment, ICR 2507.02 Lead Training, Certification, Accreditation, and Authorization Activities. October 23, 2018.
- Attachment 14:** EPA. Consultation messages sent in accordance with 5 CFR 1320.8(d)(1). July 31, 2018.