

"Internal and Deliberative, do not distribute outside of EPA"

Possible Renovation Regulatory Approaches

Regulatory Options (Cost estimates subject to change - preliminary assessment)	Base Option (considered during SBREFA) - Similar to Abatement (All pre-78 housing)	Option #1A Train, Contain, Clean & Verify (All pre-78 housing)	Option #1B Train, Contain, Clean & Verify (All pre-60 housing)	Option #2A Child occupied & all rental housing (All pre-1978 housing)	Option #2B Child occupied & all rental housing (All pre-60 housing)	Option #3 Indiana law (prohibited practices only - no abatement requirements) (All pre-60 housing)	
# of homes performing R&R in a typical year (areas >2ft ² interior, or <20ft ² exterior)	15.9 million	15.9 million	8.1 million	5.8 million	3.1 million	8.1 million	
# of homes having R&R with LBP	6.1 million	6.1 million	5.0 million	2.2 million	1.9 million	5.0 million	
# of children living in homes being renovated w/ LBP	1.3 million	1.3 million	1.2 million	1.3 million	1.2 million	1.2 million	
Firm Certification	Yes					None	
Worker Training	Trained by accredited training provider	On the job training by supervisor who has been trained by an accredited training provider					None
Worker Certification	Yes	No				None	
Supervisor Training	Trained by accredited training provider					None	
Supervisor Certification	Yes					None	
Basic Work Practices	★ Occupants restricted from the work area ★ Belongings removed or covered ★ Warning signs posted					None	
Prohibited Practices	★ High heat removal ★ Dry sanding & scraping ★ Abrasive blasting, and machine sanding w/o HEPA exhaust.	None				Same as base option plus prohibition on the use of hazardous volatile paint strippers.	
Interior Clearance	3 rd Party Clearance Test after <u>major</u> events	Supervisor Visual/Electrostatic Cleaning Cloth ("Swiffer")				None	
Exterior Clearance	3 rd Party Clearance Test after <u>major</u> events	Supervisor Visual				None	
Total Training Cost	\$89 million	\$50 million	\$26 million	\$18 million	\$10 million	None	
Work Practice Compliance Cost	\$1.9 billion	\$1.3 billion	\$679 million	\$489 million	\$259 million	Unknown	
Clearance Testing	\$919 million	\$135 million	\$69 million	\$50 million	\$26 million	None	
Fees (required by Statute)	\$180 million	\$156 million	\$80 million	\$57 million	\$30 million	Unknown	
Total with chemical test swabs w/o chemical test swabs	n/a \$3.1 billion	\$845 million \$1.7 billion	\$615 million \$854 million	\$309 million \$614 million	\$234 million \$325 million	Unknown	

*Major event refers to an job involving large scale surface preparation or demolition (approximately 38% of events).