



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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DEC 20 2013

Ref: 8RA

MEMORANDUM

SUBJECT: Region 8's response to the September 24, 2013 OIG report titled "Implementation Plan with Cost Sharing Methodology Needed for Region 8 Senior Environmental Employee Work on Lead Risk Reduction, Report No. 13-P-0430"

FROM: Shaun L. McGrath, Regional Administrator
EPA Region 8

TO: Richard Eyermann, Acting Assistant Inspector General
Office of Audit

In response to the above referenced OIG report, Region 8 is transmitting our Toxic Substances Control Act Lead Risk Reduction Implementation Strategy which includes a Lead Program Framework of our Lead Program's Vision, Goals, and Activities and our FY14 Region 8 Joint Lead Program Work Plan. The Implementation Strategy explains how funding provided by the Office of Chemical Safety and Pollution Prevention and the Office of Enforcement and Compliance Assurance will be allocated within Region 8 in FY14 and subsequent years. Since we do not yet have a final budget for FY14, the resource funding allocations are based on budget projections. Our two offices agreed to revisit the funding allocation should funding levels change significantly.

The Office of Enforcement, Compliance and Environmental Justice (ECEJ) and the Office of Partnerships and Regulatory Assistance (OPRA) will monitor Lead Program implementation efforts semi-annually through FY14 and report status to the Director of the Region 8 Grants, Audit and Procurement Program. If the joint office work plan development and implementation are successful through FY14, further monitoring and reporting will no longer be required.

If you have any questions or comments, please contact Callie Videtich, Deputy Assistant Regional Administrator, OPRA at 303-312-6434.

Attachment:

EPA Region 8 TSCA Lead Risk Reduction Program Implementation Strategy

EPA REGION 8 TSCA Lead Risk Reduction Program IMPLEMENTATION STRATEGY

I. INTRODUCTION

Region 8 developed a regional joint lead work plan that encompasses the activities of the Office of Enforcement, Compliance and Environmental Justice (ECEJ) and the Office of Partnerships and Regulatory Assistance (OPRA) Lead Programs. The work plan is the primary mechanism to allocate funding between the two offices to ensure the most efficient use of resources regardless of the levels of funding.

The Region 8 ECEJ/OPRA Lead Program work plan and funding distribution will be developed and updated annually to ensure that regional activities are in alignment with national grant and program office guidance; that funds to support regional activities are spent in accordance with above mentioned guidance; and that the activities/funding yields the greatest possible result.

II. PROGRAM GOALS

ECEJ and OPRA have jointly developed the following goals for the Region 8 Lead Program:

- Provide education to a variety of audiences to further implementation of the Toxic Substances Control Act (TSCA) Lead rules;
- Build and maintain sustainable and effective partnerships with states, tribes and locals;
- Ensure that training and service providers have the proper capacity and credentials;
- Implement a robust compliance assurance program (Lead Disclosure Rule, Renovation, Repair and Painting (RRP), Lead-based Paint (LBP) Activities); and
- Meet program, administrative, and other fiduciary responsibilities.

III. ORGANIZATIONAL RESPONSIBILITIES

On September 18, 2013, ECEJ and OPRA developed a program framework with a shared vision statement, key goals for the program, and specific activities to be conducted to accomplish these goals (Attachment 1). Activities were discussed and this information was color coded to clarify the roles and responsibilities of each office.

ECEJ and OPRA also developed a joint FY14 work plan (Attachment 2) that aligns with the activities in the framework and the FY14 National Program Manager (NPM) Guidance from the Office of Chemical Safety and Pollution Prevention (OCSPP) and the Office of Enforcement and Compliance Assurance (OECA).

IV. PROGRAM COORDINATION

ECEJ and OPRA will meet quarterly. These meetings will provide the opportunity for offices to share information of mutual interest, review any information forwarded between the offices, and share program results.

This meeting will be a standing meeting on the second Thursday of the second month in the quarter commencing in February 2014. OPRA will be responsible for coordinating the meetings from January-June and ECEJ will be responsible for coordinating the meetings from July-December. OPRA will reserve rooms for the entire year. The meeting agenda items will be put in the lead folder on the shared drive. If someone cannot attend the meeting, then the person shall notify the meeting coordinator at least two weeks prior to the meeting unless the cancellation is due to illness or other unforeseen circumstance.

V. RESOURCES

The EPA FY14 NPM Guidance from the OCSPP and OECA outline lead risk reduction strategies for regional offices such as Region 8's OPRA and ECEJ, respectively. Funding for the Region 8 Lead Program also comes from these offices. Region 8 currently has five states that are not fully authorized in both LBP Activities and RRP Rules; funding is provided for EPA to run the lead program in non-authorized states, tribes and territories. OCSPP provides funding for the region's program implementation activities (i.e., credentialing service providers, providing compliance assistance and education to the regulated and non-regulated communities). OECA provides funding for the region's compliance assurance activities (i.e., compliance monitoring, inspections, investigation of tips and complaints). Currently, both ECEJ and OPRA fund Senior Environmental Employees (SEEs) to assist EPA employees in the implementation of the lead-risk reduction programs.

The FY14 final work plan includes an analysis of resources needed to conduct each of the program activities. This resource needs analysis will be used to allocate ECEJ and OPRA SEE funding in FY14. The portion of SEE time projected to be spent on an activity will be multiplied by the salary rate of the SEE to arrive at an annual cost. These costs shall then be added to develop an allocation for each office. These resource projections outlined in the joint work plan are based on the projected funding and will not be finalized until EPA has its actual budget for FY14.

This methodology and workplan format will be used to distribute funds in subsequent years. Once the annual work plan is finalized, funding to support SEE enrollee activities will be calculated based on the annual salary for a full-time SEE and the availability of funds for the given year. When funding availability does not match work plan needs, the activities will be adjusted to focus on completing critical activities first.

VI. OVERSIGHT

ECEJ and OPRA will monitor the progress towards the implementation of the regional lead work plan quarterly through FY14.

ATTACHMENTS

- 1 – Region 8 Lead Program Framework: Vision, Goals and Activities
- 2 – FY14 Region 8 Joint Lead Program Work Plan

ATTACHMENT 1

Region 8 Lead Program Framework: Vision, Goals and Activities

LEAD PROGRAM FRAMEWORK

Vision Statement

To protect human health and the environment by implementing a holistic program that will prevent lead exposures and poisoning using our regional resources in the most efficient and effective way.

Goals

We will accomplish our vision by setting five overarching regional goals. As a One-EPA Region 8, we will plan and conduct activities to accomplish these five goals.

| 1. Education | 2. Build and maintain sustainable and effective partnerships with state, tribes and locals | 3. Ensure that training and service providers have the proper capacity and credentials | 4. Implement a robust compliance assurance program (1018, RRP, LBP) | 5. Meet program, administrative, and other fiduciary responsibilities |
|--|---|--|--|--|
| <p>A) Provide compliance and technical assistance as appropriate</p> <ul style="list-style-type: none"> i) Respond to and track inquiries via Q&A site, virtual help desk, email, phone, in person (create SOP) ii) Respond to inquiries related to individual, firm and training provider credentials (LBP activities & RRP) iii) Respond to needs of states and tribes – collaborate on education & compliance assistance | <p>A) Encourage and support state authorization requests</p> <ul style="list-style-type: none"> i) Address state agency authorization delegation ii) OPRA and ECEJ work together on review iii) Ensure program and enforcement goals adequately addressed iv) Finalize authorization packages in Federal Register | <p>A) Implement an effective credentialing program for LBP and RRP service providers</p> <ul style="list-style-type: none"> i) Certify LBP individuals ii) Review and approve RRP & LBP training provider accreditation and re-accreditation applications iii) Conduct site visits to training provider facilities and training locations prior to accreditation iv) Maintain database to track and manage certifications and accreditations | <p>A) Conduct an effective compliance monitoring program to assure regulated entities are meeting requirements</p> <ul style="list-style-type: none"> i) Target inspection candidates ii) Conduct inspections iii) Address tips and complaints | <ul style="list-style-type: none"> A) Budget B) SEE Management C) Annual work plan planning (ECEJ/OPRA) D) Legal (ORC, OGC) consultation E) Coordinate joint NPM guidance review F) Quarterly joint meetings for information sharing G) FOIAs, Congressional “data calls” |
| <p>B) Address education and outreach to the non-regulated community</p> | <p>B) Work with Tribes on Lead TSCA Program</p> | <p>B) Implement an effective auditing program for LBP and RRP training providers</p> <ul style="list-style-type: none"> i) Audit training providers; create audit reports ii) Share audit findings with training providers and EPA offices | <p>B) Where non-compliance exists develop appropriate responses in accordance with the ERP</p> <ul style="list-style-type: none"> i) Coordinate with CDPHE ii) Develop enforcement responses iii) Close out compliance reviews iv) Publicize enforcement actions | <ul style="list-style-type: none"> H) Meet Agency and Regional commitments and report (ACS RAC) measures I) Track inspections, investigations enforcement responses in ICIS |

LEAD PROGRAM FRAMEWORK

| | | | | |
|--|--------------------------------|--|--|--|
| C) Address education and outreach to the regulated community | C) Administer grants to states | | | |
|--|--------------------------------|--|--|--|

OPRA = BLUE ECEJ = RED Both = PURPLE

ATTACHMENT 2

FY14 Region 8 Joint Lead Program Work Plan

Page 9 – FY 2014 ECEJ Lead Activities

Page 12 – FY 2014 OPRA Lead Activities

Page 16 – OCSPF FY 14 NPM Lead Program Activities

Page 19 – OECA FY 14 NPM Lead Program Activities

FY 2014 ECEJ LEAD ACTIVITIES

| | A | B | C | D | E | F | G | H |
|---|---|-------|------------------|----------|---------------------|----------|---|---|
| 1 | ES&J YEAR 2014 ACTIVITIES | FTE | OECA (R/N/D) FTE | OCSE FTE | DE-STAT FUNDING FTE | OCSE FTE | OUTPUTS | TRACKED OUTPUTS |
| 2 | TARGET, PLAN, CONDUCT INSPECTIONS OF REGULATED UNIVERSE (ACS Targeted commitment) - GOAL 4A; OECA NPM 1, 2, 3, 4, 12 | | 1400 | 0.67 | | | 150 inspections to be targeted and inspected in FY14. The majority of inspection sites are targeted in advance using information from permit offices, past history with company (screening letters, tip/complaint, past investigation). | TRACKED IN ICIS |
| 3 | GENERAL/COMPLIANCE ASSISTANCE/MONITORING PARTNERSHIP BUILDING DURING FIELD ACTIVITIES - GOAL 4B; OECA NPM 1, 2, 3, 4, 8, 12 | 0.2 | | | | | Noncompliance during inspection must be closed out with certified correspondence. Informal enforcement includes Advisory or Warning letters. Formal enforcement includes penalty orders. | ENFORCEMENT RESPONSE FILES (RECORDS CENTER); TRACKED IN ICIS |
| 4 | PREPARE INSPECTION REPORTS, CONDUCT FOLLOWUP, CLOSEOUT (INFORMAL) - GOAL 4A; OECA NPM 1, 2, 3, 4, 12 | 0.25 | 400 | 0.19 | | | Each inspection must be closed out with an inspection report and closeout in ICIS and the regional contractor database. Active worksite inspections must be followed to completion with verification that site is clean. Coordination with CDPHE/Denver must occur when site is contaminated with both Lead and Asbestos. | DISTRIBUTED/ARCHIVED FILES (ALL FILES ARE FREDDED AND TRACKED BY RECORDS CENTER); TRACKED IN ICIS |
| 5 | FOLLOW UP ON ALL GENERAL CALLS/ TIPS/COMPLAINTS (SOME ARE INVESTIGATIONS, OTHERS ENTAIL PROVIDING GENERAL ASSISTANCE TO HOMEOWNERS, NEIGHBORS, LANDLORDS, SUBCONTRACTORS). GOALS 4A,1A; OECA NPM 4, 8; OCSPP NPM 1, 2, 3, 4, 6, 7, 12, 13 | | 250 | 0.12 | 300 | 0.14 | Tips/complaints come to ECEJ from the National Tip Hotline and also directly to RB. The callers are a variety of regulated and non-regulated types, with many seeking compliance/technical assistance. (Over 150 tips received in FY13) | TRACKED IN TIPS/COMPLAINTS DATABASE AND IN CONTRACTOR DATABASE |
| 6 | INVESTIGATIONS ARE INITIATED FOR ANY ACTIVITY INDICATING POTENTIAL NONCOMPLIANCE. THESE ACTIVITIES INCLUDE RESPONDING TO SCREENINGS, MULTIMEDIA INSPECTION, TIPS AND COMPLAINTS. EACH FIRM CONTACTED RECEIVES CORRESPONDENCE TO CLOSEOUT/TRACK OUR FINDINGS. GOALS 4A, 1A; OECA NPM1, 2, 3, 4, 8; OCSPP NPM 2, 3, 5, 6, 7, 12 | 0.1 | 300 | 0.14 | 500 | 0.24 | Investigations result in significant conversation with non-regulated and regulated individuals, increasing education of Lead rules across Region 8. | TRACKED IN ICIS AND REGIONAL DATABASES |
| 7 | COORDINATE WITH OPRA ON THE DEVELOPMENT OF A STANDARD OPERATING PROCEDURE ON HOW THE REGION WILL ADDRESS INQUIRIES REGARDING THE LEAD PROGRAM. GOAL 1A; OECA NPM 4; OCSPP NPM 3, 4, 6 | 0.014 | | | 50 | 0.02 | This effort ensures that callers are consistently directed to the appropriate office. | EACH OFFICE SHOULD HAVE A SYSTEM TO MAINTAIN INFORMATION REGARDING CALLS COMING INTO THE OFFICE AND HOW THE OFFICE RESPONDED. |
| 8 | DEVELOP AND MAINTAIN THE INFRASTRUCTURE WITH OUTSIDE PARTIES TO ENHANCE OUR ABILITY TO BETTER UNDERSTAND THE REGULATED COMMUNITY AND TARGET OUR EFFORTS EFFECTIVELY. GOALS 1A, 2A, 4A; OECA NPM 6; OECA NPM 6,7; OCSPP NPM 3, 4 | | | | 300 | 0.14 | SEEs meet with select permitting offices in an effort to establish partnerships. These visits also benefit EPA in that some offices maintain electronic records that will be shared once trust has been established. | ALL ELECTRONIC PERMITTING DATA/LINKS ACQUIRED DURING OUR CONTACTS WITH PERMITTING OFFICES ARE PLACED ON SHARED DRIVES FOR ACCESS BY SEES AND FTE. |
| 9 | ONGOING COLLABORATION WITH CDPHE, NOEH, DEH, OTHER STATES AS REQUIRED - BUILDING AND MAINTAINING SUSTAINABLE PARTNERSHIPS. GOALS 2A, 4A; OECA NPM 7; OCSPP NPM 5, 6, 13 | 0.1 | | | 160 | 0.08 | ECEJ works closely with the CDPHE and DEH Asbestos groups because we often share responsibility for program implementation and contractor interface. In FY14, we will expand this effort to the DEH Lead office (DEH has backfilled their Supervisor position and expressed interest to EPA to partner with them as they expand their program.) | |

FY 2014 ECEJ LEAD ACTIVITIES

| | A | B | C | D | E | F | G | H |
|----|---|-----|-------------|-------------|-------------|-------------|--|---|
| 1 | REGULATED UNIVERSE/REGULATED ACTIVITIES | FE | OECA NPM | OCSE NPM | OCSE NPM | OCSE NPM | OBJECTIVES | TRACKED OBJECTIVES |
| 10 | COLLABORATION WITH TRIBAL ENVIRONMENTAL OFFICES REGARDING A VARIETY OF ISSUES (TSCA LEAD, ASBESTOS, SCHOOLS, BROWNFIELDS) - BUILDING AND MAINTAINING SUSTAINABLE PARTNERSHIPS. GOALS 1A, 2B, 4A; OECA NPM 7; OCSP NPM 5, 6 | | 450 | 0.22 | 80 | 0.04 | The Toxics Enforcement Unit has worked closely with Tribal Environmental offices for years and our SEEs and have established strong partnerships with our Tribes . We are contacted on a variety of environmental questions which we are often able to direct elsewhere. These relationships are vital in our DI program across the board. | |
| 11 | UPDATE AND MAINTAIN THE REGIONAL CONTRACTOR DATABASE TO ALLOW FOR ONGOING COMMUNICATIONS WITH THE REGULATED COMMUNITY IN FIVE DI STATES. THIS ENABLES EPA TO CONTINUALLY EDUCATE THESE COMPANIES AND DIRECTLY IMPLEMENT THE PROGRAM WHERE THERE IS NO OTHER PRESENCE. GOAL 1A; OECA NPM 1, 2, 3; OCSP NPM 2, 4, 6, 7 | | | | 500 | 0.24 | Identifying and understanding the regulated universe provides the foundation for effectively using our limited resources in this new program. Currently, the database lists over 45,000 companies in our five DI States that have the potential to conduct RRP projects. Interacting with these companies in a variety of ways furthers our DI presence to the maximum extent. | EACH CONTRACTOR RECORD INCLUDES EACH INTERACTION/ COMMUNICATION (i.e., receipt of trifold, screening letter, phone interview) |
| 12 | SCREENING INITIATIVE -CONTACTING COMPANIES LISTED IN THE ECEJ CONTRACTOR DATABASE TO DETERMINE APPLICABILITY OF THE LEAD PROGRAM. GOALS 1A, 4A; OECA NPM 1, 2, 3; OCSP NPM 2, 4, 6, 7 | | 500 | 0.24 | 500 | 0.24 | Contractors are selected from the RB database and individually contacted. Over 600 companies were contacted in FY13 and a comparable number anticipated for FY14. This effort contributes significantly to our DI role in our five States especially in Colorado with EPA's close proximity to major metropolitan areas. These efforts address the goal of collaborating on education and compliance assistance regarding RRP. | EVERY SCREENING CONTACT HAS A RECORD IN THE REGIONAL DATABASE THAT PROVIDES A FULL PICTURE OF WHAT WE KNOW ABOUT THE FIRM. |
| 13 | COMPLETE SCREENING RECORDS (INITIAL CORRESPONDENCE, NOTES FROM THE TELEPHONE INTERVIEW, FOLLOWUP LETTER TO THE CONTRACTOR) ARE <u>SCANNED AND MAINTAINED</u> SO THAT THE TEAM CAN CROSS REFERENCE THE INFORMATION WHEN RESEARCHING EPA HISTORY WITH OUR REGULATED UNIVERSE. GOALS 1A, 2A; OECA NPM 1, 2, 3; OCSP NPM 2, 4, 6, 7 | | | | 100 | 0.07 | All conversations, interactions with the regulated community are memorialized to provide continuity as the program evolves. There are opportunities to have repeat encounters with contractors so we need to maintain the history. This is an essential part of our DI efforts in that EPA will provide this data to the State at time of assumption. | SCANNED HISTORICAL INFORMATION IS MAINTAINED IN SHARED DRIVE; INSPECTORS ALSO HAVE CDs OF RECORDS TO ACCESS IN FIELD IN ABSENCE OF INTERNET ACCESS. |
| 14 | AUDIT TRAINING PROVIDERS/COMPLETING AUDIT REPORTS/CLOSEOUT FINDINGS. GOAL 3B; OECA NPM 1, 2, 4; OCSP NPM 6 | | | | 300 | 0.14 | Concurrent with inspection trips, select training courses will be audited to ensure providers are conducting training in accordance with all applicable regulations. ECEJ will attempt to audit up to five training providers annually. | EACH AUDIT RESULTS IN DETAILED CHECKLISTS, AUDIT REPORT, AND FORMAL CLOSEOUT CORRESPONDENCE WITH TRAINING PROVIDER. |
| 15 | PARTICIPATE IN NATIONAL CONFERENCE CALLS/LOCAL AND STATE MEETINGS. ALL GOALS; ALL OCSP and OECA NPM ACTIVITIES | | 40 | 0.02 | 60 | 0.03 | OECA and OCSP conduct monthly conference calls. CDPHE holds monthly strategic planning meeting. | |
| 16 | TRACKING ALL INVESTIGATIONS/COMPLIANCE & TECHNICAL ASSISTANCE/INSPECTIONS/TIPS & COMPLAINTS IN ICIS AND REGIONAL DATABASES. GOAL 1A, 2B, 3B, 4A; OECA NPM 12; OCSP NPM 3, 4, 6 | | 135 | 0.06 | 160 | 0.08 | ECEJ tracks all activities in the appropriate database so that we may memorialize information about our regulated universe. Past history including prior communications is essential when we find noncompliance and we need to build a strong case. | REGION 8 DATABASES ENCOMPASS CONTRACTORS, PROPERTY MANAGERS, LANDLORDS, SCHOOLS. THE NATIONAL TRACKING SYSTEM IS ICIS. |
| 17 | MEET PROGRAM, ADMINISTRATIVE, AND OTHER FIDUCIARY RESPONSIBILITIES (INHERENTLY GOVERNMENTAL ACTIVITIES). GOAL 5; OECA NPM 11 | 0.1 | | | | | | |

FY 2014 ECEJ LEAD ACTIVITIES

| | A | B | C | D | E | F | G | H |
|----|--|------|-----------------|-------|-------------------|---------|--|--|
| 1 | BISCAL YEAR/04/14 ACTIVITIES | FTE | OECA FUNDED HRS | % SER | DESYAG FUNDED HRS | % SER | OUTPUTS | TRACKING/04/14 HRS |
| 18 | REVIEW GRANT APPLICATIONS, ENSURE CONSISTENCY WITH GRANT GUIDANCE/OVERSIGHT STATE GRANT ACTIVITIES (INHERENTLY GOVERNMENTAL ACTIVITIES). GOAL 5; OECA NPM 10 | 0.1 | | | | | EPA has the responsibility to ensure states are implementing their program consistent with EPA grant guidance and oversight policies. This includes communicating with each State when grant applications are received to provide formal approval; evaluating quarterly/EOY reports and conducting midyear/EOY oversight meetings. | MEETING REPORTS TO BE PREPARED; CONCERNS RAISED DURING THESE MEETINGS NEED TO BE RECORDED WITH RESOLUTIONS IDENTIFIED. |
| 19 | COORDINATE WITH OPRA ON SELECT ACTIVITIES (QUARTERLY MEETINGS, NPM/GRANT GUIDANCE REVIEWS, LEGAL REVIEWS (STATE ASSUMPTIONS). GOALS 1A, 2A, 3A, 5; OECA NPM 9, 10; OCSPP 6 | 0.04 | | | 20 | 0.01 | | |
| 20 | SUBTOTALS | 0.90 | 3475 | 1.67 | 3030 | 1.48 | | |
| 21 | HOURLY TOTALS | | | | | 6505.00 | | |
| 22 | SEE RESOURCE TOTAL | | 53% | | 47% | 3.1 | | |

OPRA FY14 LEAD WORK PLAN

| | A | B | C | D | E |
|---|---|------|-------------|--|--|
| | FY14 ACTIVITIES | FTE | DI STAG SEE | DETAILS | TRACKED OUTPUTS |
| 1 | CERTIFY INDIVIDUALS (LBP ACTIVITIES). GOALS 1A, 3A; OCSPP NPM 4 | 0.02 | 0.05 | This responsibility will be transferred to R9. Anticipate this change in Q2 FY14. | 85 applications were approved in FY13. Anticipate 20 certifications approved in Q1 FY14. Tracked in FLPP database. |
| 2 | ACCREDIT TRAINING PROGRAMS (RRP & LBP ACTIVITIES). GOAL 3A; OCSPP NPM 3, 4 | 0.07 | 0.60 | Approve initial accreditation, amendment and re-accreditation applications; conduct pre-accreditation site visits; maintain communications with training programs to increase number of certification trainings; assure training programs are up-to-date; and promote high quality delivery of course materials. | For FY14, we anticipate 2 new accreditations, 4 amendments, and 12 reaccreditations. Tracked in FLPP database |
| 3 | RESPOND TO INQUIRIES RELATED TO CERTIFICATION AND ACCREDITATION OF INDIVIDUALS, FIRMS & TRAINING PROVIDERS (RRP & LBP ACTIVITIES). GOALS 1Aii, 3A; OCSPP NPM 3, 4 | 0.02 | 0.13 | Calls and emails come to OPRA from regulated audiences inquiring about the status of their applications or how to become credentialed. | Anticipate receiving 100 credentialing inquires in FY14. Tracked in Inquiry Database |
| 4 | RESPOND TO GENERAL INQUIRIES PROVIDING LEAD POISONING PREVENTION EDUCATION AND TECHNICAL AND COMPLIANCE ASSISTANCE. GOAL 1A; OCSPP NPM 1, 2, 5, 7, 8, 9, 10, 11, 12, 13 | 0.02 | 0.13 | Calls and emails come to OPRA from regulated and non-regulated audiences. Callers include parents, homeowners, renters, landlords, neighbors, real estate agents, lenders, LBP and RRP service providers, product suppliers, pediatricians, county, Tribal, state and federal regulators and health officials, NGOs, schools and child-care facilities. | Anticipate receiving 300 general inquires in FY14. Tracked in Inquiry Database |
| 5 | DEMOGRAPHICS. GOALS 1B, 1C; OCSPP NPM 2, 6, 7, 8, 9, 10, 11, 12, 13 | 0.04 | 0.13 | Develop and implement a targeting strategy to direct DI efforts to areas that would be most impacted by lead hazards. | Number of activities guided by demographic data. |
| 6 | DEVELOP AND IMPLEMENT R8'S RRP OUTREACH STRATEGY AND CONTRIBUTE TO NATIONAL WORKGROUP. GOAL 1; OCSPP NPM 2, 7, 8, 9, 10, 11, 12, 13 | 0.01 | | Since the RRP Rule is relatively new, EPA needs to educate the regulated audience about the rule and promote an appreciation for lead-safe renovation practices with the protected community to help drive demand for RRP certified renovators. Every year, the EPA RRP Outreach Workgroup develops a national strategy and from it each region develops their region-specific strategy. HQs and Regional Lead Programs share information and project resources via monthly meetings and by utilizing Max.gov shared site. | Tracked in the RRP Outreach Shared Site. |

OPRA FY14 LEAD WORK PLAN

| | A | B | C | D | E |
|----|--|------|-------------------|---|--|
| | FY14 ACTIVITIES | FTE | DI STAG SEE | DETAILS | TRACKED OUTPUTS |
| 7 | PARTNER WITH COLORADO SCHOOLS TO PROMOTE COMPLIANCE WITH AND DEMAND FOR LBP SERVICES AND RRP SERVICES. GOALS 1B, 1C, 2; OCSPP NPM 10 | 0.01 | 0.15 | Utilizing OPRA's existing SIPM partnership with CO schools, collaborate with schools to promote compliance with and demand for LBP and RRP services. Promote development of lead poisoning prevention programs in schools. | Number of school-related entities contacted, provided education materials, trained, and/or implementing lead poisoning prevention activities. |
| 8 | PARTNER WITH CHILD-CARE REGULATORS TO IMPLEMENT A RRP RULE AWARENESS CAMPAIGN FOR CHILDCARES. GOALS 1B, 1C; OCSPP NPM 10 | 0.09 | 0.55 | Collaborate with individual child-care providers, their professional associations and child-care regulators to implement a lead poisoning prevention awareness campaign directed towards child-care providers and their clients - families with young children. Education and compliance assistance will be provided to child-care providers since they are regulated under the RRP Rule. The campaign will also drive demand for lead-safe certified services under the Lead Activities and RRP Rules. | Expect to develop and maintain 5 partnerships with state and county child-care regulators primarily in the states of CO and ND. Anticipate contacting 50% of the child-care facilities in CO and ND twice in FY14. Other outputs could include number of families contacted, number of childcare Webpages including links to EPA Lead Webpage, number of outreach materials distributed via emails, flyers, articles, presentations, posters and mailings and number of trainings presented. |
| 9 | WHOLESALE COMPLIANCE ASSISTANCE AND OUTREACH PROJECTS. GOALS 1A, 1B; OCSPP NPM 2, 7, 8, 9, 10, 11, 12, 13 | 0.09 | 1.10 | Collaborate with organizations that have connections with the EPA's regulated community to coordinate compliance assistance and outreach efforts covering the importance of becoming certified or using certified renovators with an emphasis on credentialing service providers. Efforts include a mixture of communication methods. Collaborate with organizations to disseminate lead outreach materials which will drive demand by the public for lead-safe work and promote certification of service providers. Maintain outreach material database and promote electronic dissemination of messaging. | Number of collaborations developed. Number of various entities contacted by various methods such as emails, flyers, articles, presentations, posters and mailings. |
| 10 | COLLABORATE WITH TRIBAL ENVIRONMENTAL OFFICES. GOALS 1A, 2B; OCSPP NPM 9 | 0.06 | | Contact tribes and provide lead outreach and educational materials. | Number of tribal partnerships or other projects addressing lead based paint hazards and exposure reduction = ACS measurement (TR-1) definition. In FY13 there were 28 partnerships or projects. In FY14, we plan to reduce Tribal emphasis and expect TR-1 = 3 partnerships or projects. |

OPRA FY14 LEAD WORK PLAN

| | A | B | C | D | E |
|----|---|------|-------------|---|---|
| | FY14 ACTIVITIES | FTE | DI STAG SEE | DETAILS | TRACKED OUTPUTS |
| 11 | REVIEW LEAD-SPECIFIC GRANT APPLICATIONS AND PPA GRANT APPLICATIONS, ENSURE CONSISTENCY WITH GRANT GUIDANCE/OVERSIGHT STATE GRANT ACTIVITIES. GOAL 2C; OCSPP NPM 1 | 0.18 | | Ensure States are implementing their program consistent with EPA grant guidance and oversight policies. This includes communicating with each State when grant applications are received to provide formal approval; evaluating quarterly and EOY reports and conducting midyear/EOY oversight meetings. | Program concurrence on PPG Max.gov platform provided, meeting reports prepared; concerns raised during these meetings recorded with resolutions identified. |
| 12 | ALLOCATE AND DISSEMINATE GRANT FUNDING TO STATES CONSISTENT WITH NATIONAL GRANT GUIDANCE AND PPA/PPG REQUIREMENTS. GOALS 2C, 5C; OCSPP NPM 1 | 0.09 | | Review State workplans to determine appropriate level of funding to support state efforts. | States issued funds within 30 days of receipt from HQ. |
| 13 | PROMOTE DELEGATION OF LBP ACTIVITIES AND RRP PROGRAMS TO NON-AUTHORIZED STATES. GOAL 2A; OCSPP NPM 5 | 0.02 | | Of all of R8's states, CO and ND are the most interested in taking on RRP Program delegation. OPRA can support CO and ND's pursuit of formal state legislation and program implementation by providing technical and regulatory assistance and making available grant amendments to fund their RRP Program development. MT, SD and WY have no Lead Program delegations from EPA. OPRA can identify opportunities to partner and build capacity with environmental and health departments to promote the benefits of program delegation in these states. | States request delegation of authority. Number of authorizations delegated. |
| 14 | FINALIZE UTAH'S RRP PROGRAM AUTHORIZATION. GOAL 2A; OCSPP NPM 5 | 0.21 | | Complete crosswalk review, reconcile related questions and concerns with UT, formalize UT's RRP Program in the Federal Register (first an announcement and then approval of their authorization package). | Formal authorization approval in the Federal Register. |
| 15 | FINALIZE COLORADO'S PRE-RENOVATION PROGRAM AUTHORIZATION. GOAL 2A; OCSPP NPM 5 | 0.03 | | Complete crosswalk review, reconcile related questions and concerns with CO, formalize CO's Pre-Renovation Program in the Federal Register (first an announcement and then approval of their authorization package). | Formal authorization approval in the Federal Register. |
| 16 | COORDINATE WITH ECEJ ON THE DEVELOPMENT OF A STANDARD OPERATING PROCEDURE ON HOW THE REGION WILL RESPOND TO INQUIRIES. GOAL 1A; OCSPP NPM 6 | 0.01 | | This effort ensures that inquiries are addressed in a consistent and efficient manner between OPRA and ECEJ Lead Programs. | SOP developed and implemented. |

OPRA FY14 LEAD WORK PLAN

| | A | B | C | D | E |
|----|---|-------------|-------------------|---|--|
| | FY14 ACTIVITIES | FTE | DI STAG SEE | DETAILS | TRACKED OUTPUTS |
| 17 | COORDINATE WITH ECEJ ON SELECT ACTIVITIES (DEVELOPING SHARED ANNUAL WORKPLAN; OVERSEEING STATE GRANTS; AUTHORIZING STATE PROGRAMS; AND INCREASING NUMBERS OF CREDENTIALLED LBP AND RRP SERVICE PROVIDERS). GOALS 1A, 2, 3, 5; OCSPP NPM 1, 5, 6 | 0.12 | | Meet on a regular basis to coordinate efforts. | Finalize and implement joint workplan. |
| 18 | PARTICIPATE IN NATIONAL, REGIONAL, STATE, TRIBAL AND LOCAL CONFERENCE CALLS, MEETINGS AND INITIATIVES. ALL GOALS; ALL OCSPP NPM ACTIVITIES | 0.03 | 0.08 | National lead-related conference calls are held on a quarterly, monthly, and bi-weekly basis (DD, RLC, RRP TP, RRP Outreach). Regional, Tribal and State initiatives and meetings include Lead, Tribal, EJ, Healthy Homes, Healthy Schools and Children's Environmental Health. | |
| 19 | MEET PROGRAM, ADMINISTRATIVE AND OTHER FIDUCIARY RESPONSIBILITIES. GOAL 5 | 0.38 | | | |
| | TOTAL | 1.50 | 2.92 | | |

NOTES

- DD - Division Director
- DI - Direct implementation
- EJ - Environmental justice
- EOY - End of year
- FLPP - Federal Lead-based Paint Program
- GPO - Government Printing Office
- LBP - Lead-based paint
- PPA - Performance Partnership Agreement
- PPG - Performance Partnership Grant
- RLC - Regional Lead Coordinator
- RRP - Renovation, Repair and Painting
- SIPM - School integrated pest management
- TP - Training provider

| Activity Codes | OCSPP FY14 NPM Lead Program Activities |
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| OCSPP NPM 1 | <i>Section 404(g) Grant Program Management:</i> Regional offices should manage the 404(g) grant program in accordance with the annual Section 404(g) grant guidance document. |
| OCSPP NPM 2 | <i>Outreach for Lead Rules:</i> Regional offices should provide outreach for Pre-Renovation Education Rule (406), the Lead Abatement Rule (402(a)), the Renovation, Repair and Painting Rule (402(c)) and, to a limited extent, the Disclosure Rule (1018). |
| OCSPP NPM 3 | <i>Renovation, Repair and Painting Rule (RRP) (402(c)) Implementation:</i> Regional offices should assist in the implementation of the RRP Rule by accrediting qualified training providers and providing information and compliance assistance to the regulated community. |
| OCSPP NPM 4 | <i>Lead-based Paint Activities Rule (402(a)) (Abatement, Risk Assessment and Inspection) Implementation:</i> Regional offices should assist in the implementation of the Lead-based Paint Activities (Abatement, Risk Assessment and Inspection) Rule by accrediting qualified training providers, certifying individuals and by providing information and compliance assistance to the regulated community. |
| OCSPP NPM 5 | <i>Encourage State and Tribal RRP Program Authorization:</i> Regional offices should collaborate with their states and/or tribes to encourage them to become authorized to run the RRP Program. Regional offices should provide information regarding the benefits of the Program, identify roadblocks to RRP authorization, gain knowledge about the states or tribes' needs to run the program and identify potential solutions. |
| OCSPP NPM 6 | <i>Lead Program Coordination with OECA:</i> Regional offices should coordinate implementation of the full suite of Lead Program regulations and activities as expressed in OECA's TSCA Compliance Monitoring Strategy including compliance assistance, monitoring and enforcement strategies that can be found at http://www.epa.gov/oecaerth/monitoring/programs/tsca/index.html . |

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| <p>OCSPP NPM 7</p> | <p><i>Outreach to Renovators and Homeowners:</i> Regional offices should provide information on the hazards of renovation activities in homes with lead-based paint. This outreach should stress the importance of using a EPA Lead-Safe Certified firm and the benefits of following lead safe work practices. Outreach should target homeowners and renters in areas with older housing, vulnerable populations and renovation firms.</p> |
| <p>OCSPP NPM 8</p> | <p><i>Engagement with State/City Permitting and Licensing Officials:</i> Regional offices could work with permitting and licensing offices to require that firms have shown proof of RRP certification prior to permits being issued. Because of the strong and direct connection between licensing and permitting offices and the construction industry, this is especially valuable in supporting implementation of the RRP Rule.</p> |
| <p>OCSPP NPM 9</p> | <p><i>Partner with Tribes:</i> Regional offices could create opportunities for partnerships with their Tribes to address lead-based paint hazards and exposure reduction including Direct Implementation Tribal Cooperative Agreements (DITCAs) and Memoranda of Understandings. Regional offices could partner with Tribes to identify projects, DITCA-related activities or ongoing projects to reach the national goal of eliminating childhood lead poisonings.</p> |
| <p>OCSPP NPM 10</p> | <p><i>Partner with Child-focused Stakeholders to Educate about RRP:</i> Regional offices could partner with federal, state and local organizations, child care providers and child-focused entities to develop outreach strategies that stress the importance of using an EPA Lead-Safe Certified firm and the benefits of following lead safe work practices. Outreach should target homeowners and renters in areas with older housing, vulnerable populations and renovation firms. These partnerships can also focus on increasing public awareness about preventing childhood lead poisoning, particularly among low-income and other vulnerable populations.</p> |
| <p>OCSPP NPM 11</p> | <p><i>Partner with Public Health Community to Educate about RRP:</i> Regional offices could perform outreach to the public health community, including pediatric organizations, doctor offices, hospitals and other medical facilities to increase public awareness about the hazards and prevention of childhood lead poisoning. Regional offices could provide information on the importance of using an EPA Lead-Safe Certified firm.</p> |
| <p>OCSPP NPM 12</p> | <p><i>Partner with States for Lead Education and Outreach:</i> Regional offices could partner with their states to conduct lead-based paint risk reduction education and outreach in areas with high concentrations of children with elevated blood levels.</p> |

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| OCSPP NPM 13 | <i>Collaborate with other Federal Agencies:</i> Regional offices could create opportunities for partnerships with other Federal agencies and work with them to gain access or knowledge about activities other Federal agencies are conducting in tribal or EJ communities and reach the national goal of eliminating childhood lead poisonings |
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OCSPP NPM = Final FY 2014 Office of Chemical Safety and Pollution Prevention, National Program Manager Guidance, Section V.1.B Lead Risk Reduction Program, Regional Activities, (#s 1 through 13), Pages 13 – 14.

| Activity Codes | OECA FY14 NPM Lead Program Activities |
|----------------|--|
| OECA NPM 1 | Focus primarily on compliance with the LBP Renovation, Repair and Painting (RRP) Rule /Pre-Renovation Education (PRE) Rule. With regard to the regions' LBP compliance efforts, regions should direct 95 percent of their efforts in the lead program towards RRP/PRE, and no more than 5 percent to new § 1018-only compliance. Regions should prioritize their activities to assure compliance with RRP work practices requirements. Regions may employ targeting that, while focusing on RRP/PRE, allows for concomitant compliance monitoring with other LBP rules (the § 1018 and § 402 Abatement rules), as appropriate. |
| OECA NPM 2 | Implement the program priorities and activities, including those set out in detail in the CMS, to balance the various types of inspections and other compliance assurance activities. The effective and efficient targeting of inspections, particularly work practice inspections, requires that the regions know the regulated universe, and prioritize the problems to be addressed. Regions should attempt to maximize their enforcement presence by focusing on larger violators, as appropriate. |
| OECA NPM 3 | Use the inspection targeting principles set forth in the CMS with a focus on monitoring contractors' actual compliance with required work practices. Focus efforts in high-priority lead "hot spots" as described in the CMS [e.g., geographical areas with evidence or indicators of significant or wide-spread Elevated Blood Lead Levels (EBLLs)]. |
| OECA NPM 4 | Respond appropriately to tips and complaints and actively follow-up on the highest priorities. |
| OECA NPM 5 | Coordinate with OECA to bundle press activities related to cases from multiple regions, as appropriate. |
| OECA NPM 6 | Partner with state and local government code enforcement and building permit programs and state/local health departments to conduct joint inspections. |

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| OECA NPM 7 | Partner with health departments and health care providers to identify lead hot spots and individual properties associated with EBLL children. |
| OECA NPM 8 | Initiate civil enforcement actions, consistent with national policy, to eliminate any regional inspection backlog and expeditiously bring facilities into compliance. |
| OECA NPM 9 | Work with their LBP program to encourage states to seek authorization for the RRP program |
| OECA NPM 10 | Conduct appropriate oversight of authorized state § 402 and § 406 programs. |
| OECA NPM 11 | Consistent with the EPA Order 3510, conduct an annual inventory of federal credentials which includes a physical possession check of 10 percent of the federal credentials issued to state inspectors and a count of unused credentials stock. |
| OECA NPM 12 | Enter all federal inspection and enforcement cases into the national database in a timely and accurate manner. |
| OECA NPM 13 | As necessary, work with OECA to identify and evaluate program areas that could become national priorities/enforcement initiatives in the future. |

OECA NPM = FY 2014 Office of Enforcement and Compliance Assurance, National Program Manager Guidance, June 12, 2013, Section IV.11 TSCA Lead Risk Reduction Program Activities, (#s 1 through 13), Pages 30 – 31.