

person who performs a renovation of target housing for compensation to provide a lead hazard information pamphlet to the owner(s) and occupant(s) of such housing prior to commencing the renovation.

Section 1012 of the Residential Lead-Based Paint Hazard Reduction Act requires that HUD provide the pamphlet to purchasers and tenants of housing receiving Federal assistance. Section 1018 of that Act requires that EPA and HUD promulgate regulations requiring sellers or lessors of target housing to provide purchasers and lessees with the lead hazard information pamphlet.

These different regulations are currently under development and will be announced in the **Federal Register** when completed. In addition to its regulatory distribution, this pamphlet will be used by other Federal programs to support their educational and outreach goals and obligations. CPSC, a cosponsor of the pamphlet, will distribute the pamphlet to interested parties through its ongoing outreach efforts. This pamphlet will also become an information resource for families through the National Lead Information Center and other Federal information outlets.

II. EPA's Development Process

A. Interagency Consultation

Throughout development of the draft and final pamphlet, EPA has worked closely with other interested Federal agencies, including HUD, CDC, CPSC, and the 14 other agencies involved in the Federal Interagency Task Force on Lead Poisoning Prevention.

B. Public Review and Comment

EPA developed a draft pamphlet and released it for a 60-day public comment period on March 9, 1994 (59 FR 11119), generating feedback from approximately 70 public commenters. These comments addressed stylistic, editorial, and policy concerns. All comments received have been placed into the public docket and are available for public review in the TSCA Nonconfidential Information Center (NCIC) from noon to 4 p.m., Monday through Friday, excluding legal holidays. TSCA NCIC is located at EPA Headquarters, Rm. NE-B607, 401 M St., SW., Washington, DC.

C. Targeted Focus Tests and Interviews

EPA also conducted focus tests to obtain feedback on the pamphlet's readability within lower reading-level audiences. EPA conducted these tests during the spring and summer of 1994 in five cities: Mobile, AL, Haywood, CA, Washington, DC, Atlanta, GA, and

Chicago, IL. The tests consisted of moderated group discussions and one-on-one interviews which allowed EPA to probe for areas in the pamphlet that needed simplification, clarification, or rewording. EPA targeted lower reading-level audiences in recognition that such audiences typically have the greatest trouble benefiting from written health information, are least able to participate in traditional public review and comment periods, and may also be at special risk of lead hazard exposure. The focus tests proved valuable in providing comments on specific words, phrases, and graphics, and in providing overall impressions of the draft pamphlet's strengths and weaknesses. EPA has placed summaries and background materials from the focus tests into the public docket.

D. Informal Public Meeting

On August 29, 1994, EPA held an informal public meeting in Washington, DC after publishing a notice in the **Federal Register** (59 FR 42043) and notifying all initial commenters. The meeting, which was moderated by an impartial facilitator, probed the attendants for comments on various aspects of a revised draft pamphlet using many of the same questions posed to focus group participants. Attendants at the meeting represented a wide range of views and backgrounds. A written verbatim transcription of the meeting is available for review in the public docket.

III. Summary of Key Comments and Changes

During the public comment period, focus tests, and the public meeting, EPA received hundreds of comments and recommendations for improving the pamphlet, covering editorial, layout, graphics, and policy recommendations. EPA and consulting agencies have considered all comments in developing this revised pamphlet. A Response to Comments Document is available for review in the public docket. Below is a summary of some of the key points raised and changes to the pamphlet.

1. *Pamphlet layout/design/format.* EPA received many comments concerning the draft pamphlet's length, reading level and overall design. To respond to these concerns EPA has shortened the length of the pamphlet by 10 pages and completely redesigned the graphic look and layout of the final pamphlet. This redesign includes making better use of artwork, bold fonts, bullets, and sidebars to emphasize key messages and highlight important information.

EPA has also lowered the reading level of the pamphlet overall and has simplified the wording wherever possible. The new draft provides pages at the beginning and end of the pamphlet summarizing/emphasizing key points and messages and action items for reader consideration. Using these different techniques, EPA and CPSC believe that the revised pamphlet provides varying levels of detail to different audiences, depending on their education and areas of interest. At all levels of the pamphlets detail, however, EPA and CPSC have sought to reinforce the prevention theme of the document.

Recognizing that private reproduction of the pamphlet will be a key mechanism for distribution, EPA has resized the pamphlet to use a 5½ x 8½ format to facilitate photocopy reproduction using regular 8½ x 11 paper. In addition to providing color negatives to private entities that wish to reproduce the pamphlet in color, EPA is also releasing black and white camera-ready copy of the pamphlet available for photocopy and print reproduction. To further encourage such reproduction, EPA has also added space on the back cover for names and contact information of organizations that reprint and distribute the pamphlet.

2. *Role of qualified professionals in reducing lead hazards.* Several commenters suggested that the pamphlet address the role certified professionals should play in identifying and reducing lead hazards under future Federal regulations. Recognizing that the pamphlet will be distributed in advance of the completion of Federal training and certification standards for lead workers, the pamphlet focuses on the use of lead hazard reduction professionals "with special training for correcting lead problems" rather than requiring the use of certified contractors, which may not be available in many States. The pamphlet does, however, acknowledge that a certification program is being put into place and that persons are encouraged to use certified lead abatement contractors where possible.

3. *Detail of discussion of lead hazard evaluation and reduction techniques.* Feedback from public commenters and focus test participants indicated that much of the discussion of lead hazard evaluation and reduction methods was too detailed and technical to serve the pamphlet's general purpose. At the same time, many commenters recommended that the pamphlet include additional discussion of the difference between risk assessments and inspections as well as the differences between abatement and interim