

**To:** Dravis, Samantha[dravis.samantha@epa.gov]  
**Cc:** Chai, Amy[achai@nahb.org]  
**From:** Spielvogel, Tamra  
**Sent:** Wed 4/26/2017 5:15:28 PM  
**Subject:** RE: NAHB Follow-up Information on RRP Program  
[removed.txt](#)

Samantha,

I wanted to follow up on our emails from earlier this month. While I know it has been a busy few weeks for all with both Easter/Passover holidays and a full agenda on the policy front we would still be interested in setting up a follow-up conversation to discuss this issue with you further. In fact, we will actually have a remodeler member coming to town this Monday to participate in the afternoon meeting the Office of Pollution Prevention and Toxics (OPPT) is having on “Regulatory Reform Agenda for Lead Exposure Reduction.” If you had time available to meet after that event ends at 2:30p it would be beneficial to be able to provide you a practitioner’s point of view on the program.

Thank You,

Tamra

TAMRA SPIELVOGEL Program Manager, Environmental Policy

**National Association of Home Builders**  
1201 15th Street, NW | Washington, DC 20005  
d: 202.266.8327 e: [tspielvogel@nahb.org](mailto:tspielvogel@nahb.org) w: [nahb.org](http://nahb.org)

**From:** Dravis, Samantha [mailto:dravis.samantha@epa.gov]  
**Sent:** Monday, April 03, 2017 1:55 PM  
**To:** Spielvogel, Tamra <TSpielvogel@nahb.org>  
**Cc:** Chai, Amy <achai@nahb.org>  
**Subject:** RE: NAHB Follow-up Information on RRP Program

Thanks for all this, Tamra. Give me a chance to digest and then let’s set a follow up call.

Best,

Samantha

**From:** Spielvogel, Tamra [mailto:TSpielvogel@nahb.org]  
**Sent:** Monday, April 3, 2017 1:29 PM  
**To:** Dravis, Samantha <dravis.samantha@epa.gov>  
**Cc:** Chai, Amy <achai@nahb.org>  
**Subject:** NAHB Follow-up Information on RRP Program

Dear Ms. Dravis,

I'm emailing in follow-up to your conversation with Michael Mittelholzer at the NAHB meeting with Administrator Pruitt last week. I know several issues were discussed for additional follow-up during the meeting with the Administrator including the Renovation, Repair and Painting (RRP) Program and stormwater issues which my colleague Eva will be following up with you on in a subsequent message.

Attached is the material you and Michael discussed to provide additional detail regarding NAHB's concerns regarding implementation and evaluation of the RRP program. Specifically I have provided copies of NAHB's comments related to the Section 610 review as well as those NAHB submitted during both public comment periods EPA opened during the review of issues related to the lack of an approved lead test kit. Also, for your information I am including copies of two petitions NAHB has filed with EPA on the RRP program. The most recent was in regards to the changes made to the refresher training course requirements which was denied by the agency in December 2016. The EPA response is also enclosed. I have enclosed the 2010 petition because while the other documents discuss the issues we have with the economic analysis of the rule, it was most comprehensively addressed in this petition on the test kit.

Finally, I was also told you are interested in the report where EPA's cost benefit estimates were called into question. The report was issued by the EPA Office of the Inspector General. The following link will take you to the OIG page for the report where you can access their findings, the report, as well as the responses exchanged between OIG and EPA on the report.