

To: Spielvogel, Tamra[TSpielvogel@nahb.org]
Cc: Chai, Amy[achai@nahb.org]; Inge, Carolyn[Inge.Carolyn@epa.gov]
From: Dravis, Samantha
Sent: Wed 4/26/2017 6:12:07 PM
Subject: RE: NAHB Follow-up Information on RRP Program

Tamra, we definitely ought to meet soon. Carolyn: Please reach out to Tamra and get something on my schedule. Thank you!

From: Spielvogel, Tamra [mailto:TSpielvogel@nahb.org]
Sent: Wednesday, April 26, 2017 1:15 PM
To: Dravis, Samantha <dravis.samantha@epa.gov>
Cc: Chai, Amy <achai@nahb.org>
Subject: RE: NAHB Follow-up Information on RRP Program

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 w: 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.

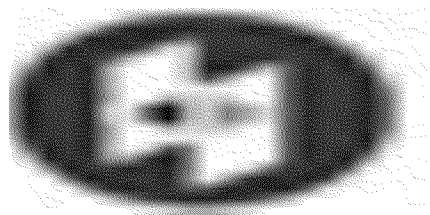
• <https://www.epa.gov/office-inspector-general/report-review-hotline-complaint-concerning-cost-and-benefit-estimates-epas>

I would note that one of the commitments made by the EPA to the OIG was to collect better data but they made the commitment to do so in the context of a separate rulemaking (the development of an RRP rule for Public & Commercial Buildings) and that survey is currently underway. NAHB individually and as part of an industry coalition has called into question the efficacy of this effort. While the data may be useful to the residential program collecting it in the context of the Public & Commercial Buildings rule has never seemed appropriate or truly illustrative given a range of other differences between the two rules. Furthermore, the data is being collected prior to establishing a hazard for Public & Commercial Buildings.

NAHB looks forward to continuing the dialogue with EPA on this program and we would appreciate the opportunity to set up a meeting with you and your team to discuss these issues further. Please feel free to contact me at 202-266-8327 or tspielvogel@nahb.org.

Regards,

Tamra Spielvogel



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