

Message

From: Spielvogel, Tamra [TSpielvogel@nahb.org]
Sent: 2/23/2018 8:07:08 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Chai, Amy [achai@nahb.org]
Subject: Thank You & Follow-up
Attachments: NAHB's_comments_on_HUD's_New_Federal_Strategy_Reduce_Childhood_Lead_Expo....pdf; NAHB Comment Letter 7-6-15 Test Kits Public Meeting Docket .pdf; EPA-Response-re-Test-Kits-June-6-Hearing.pdf

Dr. Beck,

Thank you for taking the time to meet with us and our colleagues yesterday. We appreciate your time and your attention to our issues raised concerning the RRP program. In follow-up to the discussion we wished to provide you with the information discussed regarding a number of individual items.

- Attached you will find a copy of NAHB's comments submitted in July of 2015 at the start of the public stakeholder engagement on the status of lead-paint test kits. In it, NAHB references the language from the 2008 Preamble regarding the Agency's intended course of action should no test kit meeting the regulatory requirements be brought to market in the expected timeframe - "if the improved test kits are not commercially available by September 2010, EPA will initiate rulemaking to extend the effective date of this final rule for 1 year with respect to owner-occupied target housing built after 1960." (*See the top of page 5 of NAHB's Comments.*) As the Agency never acted on this commitment an economic analysis to reflect the proposed action was never completed and no economic analysis of the regulation reflects the lack of a test kit coming to market in year two of the program as anticipated.
- Also attached, is a copy of NAHB's comments to HUD in response to the request for comments relating to updating the Federal Strategy to Reduce Childhood Lead Exposure submitted in November 2017.
- Finally, attached for your information is a letter received by NAHB from EPA confirming the status of the Agency's commitment of resources to the development of a lead-test kit that meets both performance requirements.

Please let me know if you have any questions about this material. We look forward to continued opportunities to work with you and the staff at OCSPP on the RRP program moving forward. Again, thank you for your time.

Best,
Tamra Spielvogel



TAMRA SPIELVOGEL Senior Program Manager, Environmental Policy

National Association of Home Builders
1201 15th Street, NW | Washington, DC 20005
d: Ex. 6 e: tspielvogel@nahb.org w: nahb.org

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