

To: Dravis, Samantha[dravis.samantha@epa.gov]
Cc: Chai, Amy[achai@nahb.org]
From: Spielvogel, Tamra
Sent: Mon 4/3/2017 5:29:01 PM
Subject: NAHB Follow-up Information on RRP Program
[9-7-2016 NAHB RRP Section 610 Comments.pdf](#)
[NAHB Comment Letter 7-6-15 Test Kits Public Meeting Docket .pdf](#)
[NAHB Comments LeadTestKit 2-19-2016.pdf](#)
[NAHB Petition for Reconsideration 7-5-2016.pdf](#)
[RRP Test Kit Petition 09.29.10.pdf](#)
[Petition Response NAHB signed 12-8-16.pdf](#)

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



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
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