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**From:** Spielvogel, Tamra [TSpielvogel@nahb.org]  
**Sent:** 4/5/2018 7:59:14 PM  
**To:** Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]  
**CC:** Chai, Amy [achai@nahb.org]  
**Subject:** Additional Follow up Information re RRP

Nancy,

First, thank you again for the work you did in helping to finalize the additions to the Q&A. We were able to get the updates out to our members and the clarification it provides is a valuable step forward for them.

NAHB wanted to provide some additional information to you in follow-up to our previous discussion as the ongoing program reviews continue regarding the RRP program. Through several efforts over the years we have collected various cost data related to program implementation. A summary of that data follows below and has been shared previously in greater detail with the agency during relevant regulatory comment periods. Please let us know if you have any questions or if we can provide additional material of interest.

Best,  
Tamra

Program-wide RRP Costs

When EPA first promulgated the Lead; Renovation, Repair, and Painting (RRP) rule in 2008, it estimated the cost of the rule both with and without the availability of a low-cost, reliable test kit. In 2008, EPA estimated that the RRP Rule would cost approximately \$758 million without the availability of a test kit, while costs would decrease by nearly 50% to \$407 million should a test kit become available. While EPA believed that such a test kit would be on the market by 2011, one year after the rule's implementation date, no such test kit has surfaced. The significant cost decrease associated with the availability of a test kit results in part because only 24% of all homes built between 1960-1977 contain regulated amounts of lead-based paint. However, because a compliant test kit does not exist, remodelers have no other cost-effective way to test for lead, so instead they assume the presence of lead and use lead-safe work practices on the job, hence charging their customers for work practices that are unnecessary to protect the home owner – but essential to protect the remodeler from enforcement actions.

Remodeler-Specific RRP Costs

Complying with the RRP Rule carries significant costs that vary considerably based on the type of renovation being performed, which makes tracking costs difficult. Back in 2010, approximately 35 NAHB members commented on an EPA proposal and submitted their cost data based on their experiences with the RRP program at that time – while the program was still very much in its early stages. NAHB compiled these anecdotal responses into three categories: initial costs, labor costs, and material costs. Initial costs include training, certification, and equipment purchases – for this group, the average initial cost was \$8,261, with a range of \$261-\$40,000. The average labor cost was \$2,006, with a range of \$175-6,050; and the average material cost was \$497, with a range of \$85-\$4,000.

Recent RRP Program Training Cost Data

In 2015, EPA began the process of organizing an SBAR panel for an EPA lead-based paint rule that would apply to commercial and public buildings. Two NAHB members, along with an NAHB staff member, were selected as Small Entity Representatives. As part of that process, NAHB, as well as other SBAR participants filed comments concerning EPA's training program costs. In these comments, the SERs estimated that the 8-hour RRP certified renovator training program cost approximately \$200-300, while the 4-hour refresher course cost anywhere from \$115 to \$220. EPA's estimates were significantly lower.



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