

# United States Senate

WASHINGTON, DC 20510

March 25, 2010

The Honorable Cass R. Sunstein  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, D.C. 20503

Dear Administrator Sunstein:

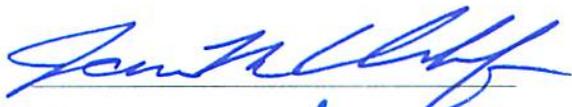
We are writing today to express our concerns about the impending April 22, 2010 deadline for implementing EPA's "Lead: Renovation, Repair and Painting Rule." Starting on April 22, 2010, renovation work that disturbs more than six square feet in target housing must be supervised by a certified renovator and performed by a certified renovation firm, as outlined in 40 CFR § 745.85.

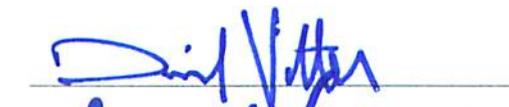
EPA, in its economic analysis of the rule, estimated that it would need to certify 236,000 renovators between April 2009 and April 2010, with another 94,000 renovators between April 2010 and April 2012<sup>1</sup>. According to EPA they have certified only 50,000 renovators, well below EPA's estimated 236,000 needed to meet the requirements of the rule. The National Center for Healthy Housing estimated that it is taking EPA nearly eight weeks to certify trainers, and currently has only 184 certified training providers. In order to meet the compliance goals of the rule, many more training providers and training sessions are needed. Additionally there are several states-- Louisiana, South Dakota, Wyoming, West Virginia-- and the District of Columbia, which currently have no approved trainers.

We believe the new lead rule can only work if there are enough certified renovators to meet the rule's compliance goals. We strongly urge OMB to take whatever actions necessary in the next 26 days to ensure that when this rule goes into effect, there are enough certified renovators available to meet the compliance goals of the rule. These actions could include ensuring EPA has enough resources devoted to compliance assistance, speeding up the turnaround time for approving trainers, expediting public awareness and media campaigns and, if necessary, delaying the rule's implementation or phasing in the rule in areas where there are adequate certified renovators.

Thank you for your attention to this matter.

Sincerely,

  
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Chuck Grassley

  
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George V. Ken尼迪

John Thun

John Barrasso  
Jeff Bond

Ron Wyden

Lamar Alexander  
Mike Crzyso

cc: Administrator Lisa Jackson

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<sup>1</sup> U.S. EPA, *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Final Rule for Target Housing and Child-Occupied Facilities*, (March 2008)