



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

March 28, 2018

**MEMORANDUM**

**SUBJECT:** Project Notification:  
EPA's Implementation and Enforcement of the Lead-Based Paint Renovation,  
Repair and Painting Rule  
Project No. OA&E-FY18-0162

**FROM:** Jeffrey Harris, Director  
Toxics, Chemical Management and Pollution Prevention Directorate  
Office of Audit and Evaluation

**TO:** Charlotte Bertrand, Acting Principal Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention

Susan Bodine, Assistant Administrator  
Office of Enforcement and Compliance Assurance

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin preliminary research to evaluate the EPA's implementation and enforcement of the Lead-Based Paint Renovation, Repair and Painting Rule (RRP).

Our objective for this project is to determine whether the EPA has an effective strategy to implement and enforce the lead-based paint RRP.

The OIG plans to conduct work at EPA headquarters and at any other appropriate sites. Applicable generally accepted government auditing standards will be used in conducting our project. The anticipated benefits of this project are reduced risks to human health and the environment from lead-based paint during lead-based paint renovation and repair.

We will contact you to arrange a mutually agreeable time to discuss our objectives and the purpose of the preliminary research phase of our project. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the project process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the course of the project. Throughout the project, we will provide updates on a regular basis as agreed upon at this meeting.

To ensure timely completion of this project, please provide the following information to Chad Kincheloe, Project Manager, at [kincheloe.chad@epa.gov](mailto:kincheloe.chad@epa.gov), prior to the kickoff meeting:

- Agency policies, procedures, matrix or data on how the EPA measures RRP contributions to reducing lead blood levels in children and overburdened or disproportionately affected communities.
- List of EPA's headquarters and regional full-time equivalents and funding for the RRP program for fiscal years 2014 to 2018, and a point of contact.
- List of RRP contracts, grants and interagency agreements for fiscal years 2014 to 2018 along with a point of contact.
- Identification of RRP annual commitments made through the National Program Managers Guidance for fiscal years 2014 to 2018, and a point of contact.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978 to have timely access to personnel and all materials necessary to complete its objectives. We will request your resolution if an agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the Semiannual Report to Congress.

I will supervise the project and, as mentioned earlier in this memorandum, the Project Manager will be Chad Kincheloe. Any information related to the project should be addressed to me at (202) 566-0831 or [harris.jeffrey@epa.gov](mailto:harris.jeffrey@epa.gov), or to Chad Kincheloe at (312) 886-6530 or [kincheloe.chad@epa.gov](mailto:kincheloe.chad@epa.gov).

cc: Ryan Jackson, Chief of Staff  
Henry Darwin, Chief of Operations  
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