

**IMPORTANT NEWS FROM NATIONAL ECON CORPORATION!!**

**The EPA is present & conducting Lead-Based Paint Compliance Inspections!**

February 3, 2011

To all of you who think that the EPA RRP is a bunch of hype, I have news for you!

A member of our industry, owner/management company, received a notice from EPA on January 28, 2011 that they would be arriving to inspect and audit their properties. *This inspection was not complaint driven.* EPA arrived on time and conducted their inspection... tight-lipped.

The owner/manager that went through the inspection was kind enough to share with me their experience. I was told that EPA checked their documents to confirm that the letters regarding receipt of "Protect Your Family from Lead in Your Home" were signed, dated and the boxes were checked. Work Orders were reviewed and copies of staff and vendor RRP certificates were asked to be produced so they could take copies of those as well.

The individuals stated that the most uncomfortable part was the fact that EPA couldn't and wouldn't tell them anything other than this was enforcement in section 1018 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and Regulation 40 CFR Part 745 to determine if there are violations and if penalties could be imposed.

I had the opportunity to speak with one of the inspectors and was told that they only give a weeks notice. The inspections are being conducted based on geographic area. EPA is inspecting, owners and managers, single-family and multi-family properties. EPA will come in and take copies of certain documents to take back to their office to prepare reports. Unfortunately, they will not and cannot tell you anything.

The documents being inspected are up to 3 years of lease files and work orders, on occasion walking the properties and talking to tenants. They are also looking for EPA certificates for your staff members and your vendors.

I asked how does this inspection affect those that have had their pre-1978 properties inspected. The inspector stated that as long as they have the report that shows the





property has completed a Lead-Based Paint Inspection and if no lead-based paint is found, they take copies and move on.

Having pre-1978 properties inspected for lead-based paint would definitely pay for itself within the first year... or less. Not only for this reason but from a cost effective maintenance stand point as well.

The procedure is completely non-invasive, and the results are provided immediately. We have found that in properties built between 1955 -1978, a very small percentage (5% or less) test positive. The positive components are usually (not-always) on the exterior, such as a handrail.

Lead Abased Paint Inspections are conducted using an XRF (X-Ray Fluorescent) instrument. In the State of California, only a Certified Inspector/Assessor certified under CADPH Title 17 may conduct Lead-Based Paint Inspections. Inspections are conducted in accordance with Chapter 7 Title X HUD guidelines. *The Lead-Check test kits are not legal and/or recognized by the State of California.* We do not always have to test every unit. It depends on the number of units you have and the year they were built.

Should you have any questions, please contact National Econ and we will be glad to assist you! 877-NAT ECON (877-628-3266).