



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Sent via Email: "crahn@bradysullivan.com"

JUN 09 2017

Christina Rahn
Property Manager
Brady Sullivan Harris Mill Lofts
618 Main Street
Coventry, RI

Re: Notice of Compliance Inspection

Dear Ms. Rahn:

The United States Environmental Protection Agency ("EPA") is requesting that you meet with our inspectors who will be conducting an inspection of lease, lead disclosure, and lead-related records for all pre-1978 residential units leased at the Harris Mill Lofts managed by you or an affiliate on one of the following dates: Friday, June 16; Friday, June 23; or Wednesday, June 28 at ~ 11:00 a.m. at the above address, unless instructed by you otherwise.

The inspection will also include a review of renovation activities performed by you, your employees, or subcontractors on any pre-1978 housing and/or child-occupied facilities. The purpose of the inspection is both to evaluate compliance and to provide compliance assistance.

We will evaluate compliance with the *Residential Lead-Based Paint Hazard Reduction Act*, (also known as the "Disclosure Rule") codified at 42 U.S.C. §4852d, and its implementing regulations at 40 C.F.R. §745, Subpart F, which requires persons leasing or selling residential housing built prior to 1978 ("target housing") to disclose known lead-based paint or lead-based paint hazards and to provide a federally approved lead hazard information pamphlet to lessees and purchasers. Because Rhode Island has adopted their own

We will also evaluate compliance with the regulation entitled *Residential Property Renovation*, codified at 40 C.F.R. §745, Subpart E, as it has been codified by Rhode Island. This Subpart encompasses the Renovation, Repair, and Painting ("RRP") Rule. We will review documentation of the record keeping practices and ask detailed questions concerning compliance with work practices required under this Rule. The documents to be reviewed are records from all activities conducted after the purchase and conversion of the Harris Mill Lofts into residential units, in which you, your employees, or subcontractors disturbed more than six square feet of interior or 20 square feet of exterior painted surface in target housing.

In addition to documentation of required record keeping practices of the RRP Rule, EPA will also need documentation of firm and/or renovator RRP certification(s). Because Rhode Island is authorized by the EPA to enforce their own RRP Rule regulations and they have adopted their own regulations regarding the RRP Rule, we will be accompanied by an inspector from the Rhode Island Department of Health.

Here is a link about the RI RRP Regulations:

<http://www.health.ri.gov/healthrisks/poisoning/lead/about/renovationrepairandpainting/>

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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In order to make the inspection easier for everyone, prior to the inspection, please send the following information to me via my FAX number at (617) 918-0848:

1) **A list of addresses of target housing leased and managed by you at the Harris Mill Lofts within the last two years.** Please include the details regarding the property and/or unit, as follows:

- Indicate the year of construction;
- Indicate the number of units for this property;
- Indicate if any of the units have had lead abatement orders from the state or local health agency, and the status of each abatement order;
- Indicate which units have had lead risk assessments, inspection reports, and/or have Letters of Compliance or Conformance;
- Indicate the units with HUD Section 8 lessees;
- Indicate the units with children and if known, include their ages (between 0-18 years); and
- **Indicate the units in which you or your employees performed activities that disturbed more than six square feet of interior or 20 square feet of exterior painted surface, including common areas within the last two years.**

2) **For rental transactions from the above list, please provide:**

- A list of all the units with “move-ins” within the last 2 years (May 1, 2015 to present). Include the names, addresses and unit numbers, and the date of each move-in.

3) **For each renovation activity which disturbed more than six square feet of interior or 20 square feet of exterior painted surface, including common areas, during the conversion of the property to residential units and up to present, performed by you, your employees, or subcontractors on target housing or child-occupied facilities other than those identified in 1) above, please provide:**

- The address of the unit;
- The date of activities;
- The scope of activities; and
- The name and contact information of the subcontractor, if applicable.

From the lists, you provide, we will randomly select 15% of the lease transactions and 15% of the renovation activities that disturbed more than six square feet of interior or 20 square feet of exterior painted surface that will be the focus of the paperwork review during the inspection.

I will inform you of the selected transactions so that prior to the inspection, copies of the lease documents from the selected transactions, including the corresponding disclosure forms and all lead documents (including Letters of Conformance, Lead-Based Paint Risk Assessment Reports, etc.) are made and ready for review.

Also, make copies of your or any of your subcontractors’ RRP firm and/or RRP individual renovator certifications, the selected renovation activities, and the corresponding occupant/owner notification whenever non-emergency repairs or renovations were conducted in target housing or child-occupied facilities.

The inspection will include a review of the above documents and any lead-based paint information, regardless of date. Lead-based paint information includes: notices and orders from state and/or city agencies, communications regarding elevated blood lead levels ("EBLLs") in children residing in any of your units, and lead-based paint risk assessments or abatements for the above-mentioned target housing. For your information, zero-bedroom dwellings as defined in §745.106 and housing set aside for the disabled or elderly as described in §745.223 are exempt from these requirements.

Please call me at **(617) 918-1848** with any questions you may have.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Molly Magoon".

Molly Magoon
US EPA Region 1 (New England)
Office of Environmental Stewardship
Toxics and Pesticides Unit (OES 05-4)
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