UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

June 29, 2015

Marc Pinard, Esq.
Brady Sullivan Properties, LLC
670 N. Commercial Street
Manchester, New Hampshire 03101

Re: Order to Brady Sullivan Properties, LLC Requiring Cleanup, Testing, Analysis and Reporting Under Section 7003 of the Resource Conservation and Recovery Act

Dear Mr. Pinard:

Pursuant to the telephone conversation on June 25, 2015, with EPA, NH DHHS, you and Brady Sullivan's consultants, EPA is making the following clarifications and changes to the June 19, 2015 Order issued to Brady Sullivan under Section 7003 of the Resource Conservation and Recovery Act:

1. Section II.A. The date for completion of abatement of common areas is extended from July 15, 2015, until July 31, 2015. However, Brady Sullivan shall complete the cleaning of dust hazards in residential units by July 15, 2015;

2. Section II. A.2. The Order does not require that the Risk Assessment address lead paint hazards in residential units. However, EPA strongly recommends that Brady Sullivan include in the Risk Assessment lead paint hazards in units currently occupied by children 6 years old and under and pregnant women. It is EPA's understanding that the Risk Assessment and Cleanup Plan will be submitted during the week of June 29, 2015, for formal EPA review and approval;

3. Section II.A.3. EPA is clarifying that lead dust hazardous should be "cleaned" to meet the cited standards, rather than "abated." However, the term "abate" still applies to lead paint hazards in common areas.

During the telephone conversation, it also was pointed out by EPA that any work being conducted in an area that is being converted to residential housing must be in performed in compliance with the federal Renovation, Repair and Painting Rule.

If you have any additional questions or concerns, please contact the following EPA staff members:

- Legal issues: Andrea Simpson, at (617) 918-1738
- Technical issues: Molly Magoon, at (617) 918-1848
- Press issues: Emily Bender, at 617-918-1037

Sincerely,

Susan Studlien

Susan Studlien
Director
Office of Environmental Stewardship
EPA, Region 1

cc: Tim Soucy and Alexander Alexakos, City of Manchester Health Department
Beverly Drouin, New Hampshire Department of Health and Human Services
Gabriel Porter, OSHA