



U.S. DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT  
OFFICE OF INSPECTOR GENERAL

February 11, 2016

**MEMORANDUM NO:**  
[2016-NY-1801]

*Memorandum*

TO: Annmarie Uebbing  
Director, Office of Community Planning and Development, 2FD

FROM: //SIGNED//  
Kimberly Greene  
Regional Inspector General for Audit, 2AGA

SUBJECT: The City of Jersey City's Administration of Its Lead Paint Activities Did Not Comply With Federal and New Jersey State Requirements

**INTRODUCTION**

We are conducting an audit of the City of Jersey City's Community Development Block Grant (CDBG) program based upon an Office of Inspector General (OIG) hotline complaint containing several allegations, one of which was that the City's Division of Community Development's lead risk assessor was not qualified or producing monitoring reports for rehabilitation work funded under the City's Homeowner Rehabilitation Program. The objective of our review is to determine whether the complaint allegations had merit. During our review of 10 homeowner rehabilitation activities funded under the City's program, incidents of noncompliance with CDBG program lead paint requirements raised an issue of concern that we wish to bring to your attention for immediate corrective action.

U.S. Department of Housing and Urban Development (HUD) Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, Title 5 United States Code, section 8M, requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://www.hudoig.gov>.

Should you or your staff have any questions, please contact Karen A. Campbell-Lawrence, Assistant Regional Inspector General for Audit, at (212)-542-7977.

## **METHODOLOGY AND SCOPE**

To obtain an understanding of the City's administration of lead paint activities, we reviewed applicable Federal and State laws and regulations, reviewed the City's homeowner rebate program policy and procedure manual, interviewed officials from HUD's Newark, NJ, Office of Community Planning and Development and the City's Community Development Division, and administered an internal control questionnaire to City officials. Since the complaint alleged the City's misappropriation of CDBG funds for at least two years prior to the December 2014 date of the complaint, we selected and reviewed a sample of 10 of 27 case files of homeowner rehabilitation funded under the City's Homeowner Rehabilitation Program in 2012 and 2013, April 1, 2012, through March 31, 2014. The results of the sample testing were limited to the case files reviewed and cannot be projected to the universe. The ten case files were selected based on one of the following risk factors: materiality of assistance provided to each property, lack of an imposed lien on an assisted property, and assistance provided in excess of the maximum assistance limit.

We performed our onsite work from May through October 2015 at the City's Community Development Division located at 30 Montgomery Street, Jersey City, NJ. Our review of the City's lead paint activities was conducted in accordance with generally accepted government auditing standards.

## **BACKGROUND**

All housing units assisted with CDBG funds must comply with regulations at 24 CFR (Code of Federal Regulations) Part 35, regarding lead-based paint poisoning prevention in certain residential structures. All lead-based paint activities must be performed under the work practice standards at 40 CFR 745.227.

The City was awarded more than \$5.2 and \$5.8 million in CDBG funds in program years 2014 and 2015, respectively. The City's Homeowner Rehabilitation Program was designed to assist income-eligible homeowners in abating code violations and eliminating safety and health hazards in the Jersey City housing stock. The City's program assisted 27 Jersey City homeowners with \$680,787 in CDBG funds to rehabilitate their homes.

## **RESULTS OF REVIEW**

City officials did not ensure that the risk assessment of lead hazards in homeowners' houses was conducted in compliance with Federal and New Jersey State laws and regulations. Specifically,

- Lab certificates of lead dust analysis show that lead dust of 328 and 488 micrograms per feet squared ( $\mu\text{g}/\text{ft}^2$ ) was found in window sills after rehabilitation work was completed at two homeowner units (detailed in appendix B). Regulations at 24 CFR § 35.1320 provide that the dust lead standard for interior window sills is 250  $\mu\text{g}/\text{ft}^2$ . However, two rehabilitated homeowner units had lead paint dust in excess of the dust lead standard.
- Signed statements on the existence of lead paint hazards at three rehabilitated homeowner units were not adequately completed by the City's lead risk assessor. Specifically, one

final inspection certification form was signed and dated before the rehabilitation work completion date; one final inspection certification form was signed, and both boxes pertaining to whether lead paint existed were checked; and one final inspection certification form was signed, and neither box pertaining to whether lead paint existed was checked (detailed in appendix C). Section 4.4 of the City's homeowner rebate program policy and procedures manual provides that clearance must be performed by a certified professional to check whether rehabilitated units are safe for occupancy and that the clearance will also include a detailed report to be maintained in the case file. However, the only document certified by the City's lead risk assessor, after the completion of rehabilitation work at the homeowners' units, was not adequately completed.

- An initial lead risk assessment report was not prepared for one homeowner unit, and the report for another homeowner unit did not include all of the required information, such as the lead risk assessor name, result of visual inspection, and serial number of the X-Ray Fluorescence (XRF) device used (detailed in appendix D). Regulations at 40 CFR § 745.227(d)(11) provide that the certified risk assessor must prepare a risk assessment report, which must include the date of assessment, address of the building, risk assessor name and certification number, result of the visual inspection, specific locations of each painted component tested for the presence of lead, and serial number of any XRF device and other information.
- Lab certificates of lead dust analysis show that surface samples collected by the City's lead risk assessor for the ten homeowner units reviewed were collected only from window sills instead of window sills and floors. Regulations at 40 CFR § 745.227(d)(5) provide that dust samples from the interior window sill(s) and floor must be collected and analyzed for lead concentration in all living areas where one or more children, age 6 and under, are most likely to come into contact with dust. Further, the City's lead risk assessment reports for eight homeowner units stated that dust samples used to determine the level of lead dust in the homes were collected from horizontal surfaces where lead dust could accumulate, such as the floor, stair tread, window sill, window well, etc. However, the dust samples were collected from window sills only (detailed in appendix E).
- The City's XRF lead analyzer was not registered with the State of New Jersey. Compliance with the HUD regulations at 24 CFR Part 35 does not relieve participant of responsibility for compliance with State or local laws. Further, New Jersey Administrative Code 7:28-3.1(a) provides that any State, county, or local government must register with the Department of Environmental Protection every ionizing radiation-producing machine in the State of New Jersey. According to City officials, the City is exempt under NJAC7:28-3.2(c) which provides that ionizing radiation-producing machines possessed, stored or used by agencies of the United States Government are exempt from registration. However, the City is not exempt since it is not considered to be an agency of the U.S. government. As a result of our inquiry, City officials recently submitted an application to the State of NJ for registering the XRF device; however, there is no evidence to date that the registration was approved.

In addition to the above, our ongoing audit has identified other CDBG program deficiencies that will be addressed in our final audit report planned for issuance after this audit memorandum. These deficiencies provide additional concerns with the City's financial and administrative controls to ensure that the City's CDBG program was administered in compliance with program requirements and Federal regulations.

### **CONCLUSION**

There was no assurance that the household members of the homes rehabilitated with CDBG funds were not at risk of lead paint hazards, that lead paint dust did not exist after rehabilitation work was completed at the 27 homes rehabilitated with CDBG funds in program years 2012 and 2013, and that the City's XRF lead analyzer complied with New Jersey administrative codes. We attributed these deficiencies to the City staff's unfamiliarity with CDBG program requirements and improper supervision of the City's lead risk assessment process.

### **RECOMMENDATIONS**

We recommend that the Director of HUD's Newark, NJ, Office of Community Planning and Development instruct City officials to

- 1A. Notify the two homeowners that lead dust existed in their homes after the rehabilitation work was completed and that it exceeded HUD's allowable lead limits.
- 1B. Collect and test lead dust samples from the floors and window sills of the 27 homeowner units that received CDBG funds in program years 2012 and 2013 to ensure that the lead dust does not exceed the allowable lead dust standards. If the tests reveal the existence of excessive lead dust, City officials need to reduce the lead dust to the allowable limit, or reimburse the City's CDBG line of credit from non-Federal funds for disbursements previously made to repair those 27 units.
- 1C. Strengthen the City's administrative controls to ensure that the lead risk assessment conducted after the completion of rehabilitation work is adequately documented.
- 1D. Strengthen the City's administrative controls to ensure that adequate documentation is maintained to support compliance with the Federal and State lead requirements.
- 1E. Provide documentation to support that the City's XRF lead analyzer is registered with the State of New Jersey as required.
- 1F. Provide lead hazard training to the City's lead risk assessor to ensure compliance with Federal and State requirements.

# Appendixes

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## Appendix A

### AUDITEE COMMENTS AND OIG'S EVALUATION

Ref to OIG  
Evaluation

Auditee Comments



STEVEN M. FULOP  
MAYOR OF JERSEY CITY

**CITY OF JERSEY CITY**  
DEPARTMENT OF LAW

CITY HALL | 280 GROVE STREET | JERSEY CITY, NJ 07302  
P: 201 547 5229 | F: 201 547 5230



JEREMY FARRELL  
CORPORATION COUNSEL

February 3, 2016

**VIA ELECTRONIC AND REGULAR MAIL**  
Kimberly Greene  
Regional Inspector General for Audit, 2AGA  
Office of Audit, Region 2  
26 Federal Plaza, Room 3430  
New York, NY 10278

**Re: City of Jersey City Response to OIG Draft Audit Memorandum  
re: Lead Paint Activities**

Dear Ms. Greene:

Please accept this correspondence on behalf of the City of Jersey City in connection with the above matter. Specifically, this letter is in response to a recent request from your office for the City to combine its two written submissions regarding the above matter into one single document. As a result, below please find the City's two written submissions to date.

**City of Jersey City's Initial Response Dated January 8, 2016**

**Recommendation 1A:** Notify the two homeowners that lead dust existed in their homes after the rehabilitation work was completed and that it exceeded HUD's allowable lead limits.

**RESPONSE:** The City has notified the two affected property owners as well as the tenants and have provided them with updated information regarding the lead paint testing process. In addition, the City has also retained an environmental firm to specifically test each affected property and produce a written report. In this regard, the City has advised the affected property owners that upon completion of the testing each owner will receive a copy of the written report. Further, the City has informed the property owners that in the event the testing reveals unhealthy levels of lead dust, the City will have all occupants tested.

**Recommendation 1B:** Strengthen the City's administrative controls to ensure that the lead risk assessment conducted after the completion of the rehabilitation work is adequately documented.

Comment 1

# AUDITEE COMMENTS AND OIG'S EVALUATION

## Ref to OIG Evaluation

## Auditee Comments

Comment 2

**RESPONSE:** In an effort to strengthen the City's administrative controls, the Division of Community Development (DCD) has implemented a revised organizational chart. This internal reorganization will allow DCD to more efficiently allocate duties and responsibilities to those employees who are most qualified to address the deficient areas that have been identified in the audit. A copy of DCD's organizational chart is attached hereto.

**Recommendation 1C:** Strengthen the City's administrative controls to ensure that adequate documentation is maintained to support compliance with the Federal and State lead requirements.

**RESPONSE:** See response to 1B. In addition, the City will be reviewing its current training protocols to ensure compliance with Federal and State regulations.

Comment 2

**Recommendation 1D:** Collect and test lead dust samples from the floors and window sills of all of the homeowner units that received CDBG funds in program years 2012 and 2013 to ensure that the lead dust does not exceed the allowable lead dust standards.

Comment 3

**RESPONSE:** The City has identified all CDBG assisted properties in 2012 and 2013 and will assign the testing of these properties to an environmental consulting firm. At this time, the City estimates that there are approximately 15-20 CDBG assisted properties for the years 2012 and 2013.

**Recommendation 1E:** Provide documentation to support that the City's XRF lead analyzer is registered with the State of New Jersey as required.

Comment 4

**RESPONSE:** The City has obtained the required registration forms and submitted them to the State for processing. In this regard, it should be noted that initially New Jersey was not an "agreement" state, which would have required the registration of the lead analyzer. We further point out that in 2008 New Jersey formally became an "agreement" jurisdiction, which triggered the administrative compliance with the State regarding registration of lead paint analyzers.

**Recommendation 1F:** Provide lead hazard training to the City's lead risk assessor to ensure compliance with Federal and State requirements.

Comment 2

**RESPONSE:** See response to 1B. In addition, please be advised that an integral part of the City's reorganization will be to implement more effective oversight of all job-related training that is necessary for City employees to competently carry out their job duties.

We look forward to discussing the City's responses contained herein in greater detail during the final exit meeting on Monday, January 11<sup>th</sup>.

# AUDITEE COMMENTS AND OIG'S EVALUATION

Ref to OIG  
Evaluation

## Auditee Comments

Comment 5

**City of Jersey City Response to the Revised Draft Audit Memorandum issued on January 11, 2016.**

**Revision 1:** Since the complaint alleged the City's misappropriation of CDBG funds for at least two years prior to the December 2014 date of the complaint.

**RESPONSE:** It must first be noted that the Law Department has not reviewed a copy of the OIG Hotline Complaint. As such, any allegations relating to City "misappropriation of funds" have been communicated to us via the OIG during our in person status meetings. Based upon those meetings, it is our understanding that the scope of this particular phase of the OIG's audit is limited to the lead paint compliance measures pursuant to 24 CFR Part 35. To this end, the only documentation the undersigned has reviewed in support of the OIG's Memorandum is lead paint inspection reports, which were appended as exhibits to the OIG Memorandum.

Comment 1

Notwithstanding the above and without waiving the City's right to rely upon its position as stated in its initial January 8<sup>th</sup> response letter, to the extent that "misappropriation of funds" refers to the City's quality control of its lead paint inspectors, the City points out that it has diligently notified the two affected property owners as well as the tenants and have provided them with updated information regarding the lead paint testing process. In addition, the City has also retained an environmental firm to specifically test each affected property and produce a written report. In this regard, the City has advised the affected property owners that upon completion of the testing each owner will receive a copy of the written report. Further, the City has informed the property owners that in the event the testing reveals unhealthy levels of lead dust, the City will have all occupants tested. In addition, in an effort to strengthen the City's administrative controls, the Division of Community Development (DCD) has implemented a revised organizational chart. This internal reorganization will allow DCD to more efficiently allocate duties and responsibilities to those employees who are most qualified to address the deficient areas that have been identified in the audit. A copy of DCD's organizational chart was provided as part of the City's initial response.

Comment 2

**Revision 2:** If the tests reveal the existence of excessive lead dust, City officials need to reduce the lead dust to the allowable limit, or reimburse the City's CDBG line of credit from non-Federal funds for disbursements previously made to repair those 27 units.

Comment 6

**RESPONSE:** The City has informed the property owners that in the event the testing reveals unhealthy levels of lead dust, the City will have all occupants tested. As indicated during the exit meeting, the City is not using program funds to pay for the inspection compliance, which involves hiring of an environmental firm to conduct the testing and issue appropriate reports. As further discussed during the meeting the City will consider application of the bidding process in order to retain a vendor to complete the additional testing of the 27 properties identified in the OIG Memorandum.

# AUDITEE COMMENTS AND OIG'S EVALUATION

**Ref to OIG  
Evaluation**

**Auditee Comments**

Thank you for your courtesies.

Very truly yours,  
JEREMY FARRELL  
CORPORATION COUNSEL  
*/s/ James M. LaBianca*  
Asst. Corporation Counsel

JML

Cc: Karen A. Campbell Lawrence  
Mostafa Elhalo  
Carmen Gandulla  
Jeremy Farrell  
Joanne Monahan

## **AUDITEE COMMENTS AND OIG'S EVALUATION**

- Comment 1 City officials' actions are responsive to the recommendation. However, City officials need to provide HUD Newark CPD office with documentation to support that notifications were sent to the two affected property owners.
- Comment 2 City officials' actions are responsive to the recommendation. However, City officials need to provide HUD Newark CPD office with documents to support amending its policies and training requirements to ensure compliance with Federal and State requirements.
- Comment 3 City officials stated that the City estimates that there are approximately 15-20 CDBG assisted properties for the years 2012 and 2013. However, our review of documents provided by City officials during the audit reveals that the City's program assisted 27 Jersey City homeowners in program year 2012 and 2013.
- Comment 4 City officials' action is responsive to the recommendation. However, City officials need to provide a copy of the City's XRF lead analyzer registration with the State of New Jersey to HUD Newark CPD office.
- Comment 5 City officials reiterate that they have not reviewed the hotline complaint and that the draft audit memorandum pertains only to the lead paint compliance measures pursuant to 24 CFR Part 35.
- Comment 6 City officials' planned actions are responsive to the recommendation. However, City officials need to provide HUD Newark CPD office with documents to disclose the result of testing the 27 units for lead paint dust and the corrective actions if lead dust exceeds the allowable limit.

# Appendix B

## LAB CERTIFICATES OF LEAD DUST ANALYSIS



**Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082**

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<p><b>Client:</b> Jersey City Division of Community Development 30 Montgomery St., Room 404 Jersey City NJ 07302-</p> <p><b>Attn:</b> [Redacted] <b>Ph.:</b> [Redacted] <b>Fax:</b> [Redacted] <b>Email:</b> [Redacted]</p> <p><b>Project Location:</b> [Redacted]</p> <p><b>Comments:</b> [Redacted]</p>	<p><b>AAT Project #:</b> 135989 <b>Client Project:</b> <b>Sampling Date:</b> 9/28/2012 <b>Date Received:</b> 10/2/2012 <b>Date Analyzed:</b> 10/5/2012 <b>Date Reported:</b> 10/5/2012</p>
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Lab ID#	Client Code	Sample Description	Length (inches)	Width (inches)	Area (Sq Ft)	Results Lead µg/ft <sup>2</sup> *	Analyst
1370880	JCZ-1	JCZ-1 WS	18	2	0.25	180.00	ND
1370881	JCZ-2	JCZ-2 WS	18	2	0.25	328.00	ND
1370882	JCZ-3	JCZ-3 WS	18	2	0.25	< 40	ND
1370883	JCZ-4	JCZ-4 WS	18	2	0.25	< 40	ND
1370884	JCZ-5	JCZ-5 WS	18	2	0.25	< 40	ND
1370885	JCZ-6	JCZ-6 WS	18	2	0.25	< 40	ND

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft<sup>2</sup> (Floors Carpeted/uncarpeted), 250ug/ft<sup>2</sup> (Window Sill/Stools), 400 ug/ft<sup>2</sup> (Window Trough /Well/Exit Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP - Lab ID #109990  
NY State DOH ELAP - Lab ID #11864  
State of Ohio - Lab ID # 10042

Analyst Signature: [Redacted]



Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

Client: Jersey City Division of Community Development  
30 Montgomery St., Room 404  
Jersey City NJ 07302-

AAT Project #: 137868  
Client Project: [Redacted]  
Sampling Date: 10/17/2012  
Date Received: 10/23/2012  
Date Analyzed: 10/26/2012  
Date Reported: 10/26/2012

Attn: [Redacted]  
Ph: [Redacted]  
Email: [Redacted]

Project Location: [Redacted]

Comments:

Lab ID#	Client Code	Sample Description	Length (inches)	Width (inches)	Area (Sq Ft)	Results Lead ug/ft2 *	Analyst
1388364	JCG-1	1ST FLR KITCHEN WS	18	2	0.25	60.60	TG
1388365	JCG-2	1ST FLR BATHRM WS	18	2	0.25	< 40	TG
1388366	JCG-3	2ND FLR REAR BEDRM WS	18	2	0.25	488.00	TG
1388367	JCG-4	2ND FLR BEDRM WS	18	2	0.25	< 40	TG
1388368	JCG-5	2ND FLR MIDDLE BEDRM WS	18	2	0.25	< 40	TG
1388369	JCG-6	1ST FLR DFRM WS	18	2	0.25	< 40	TG

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft2 (Floors Carpeted/uncarpeted), 250ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough/WWell/Ext Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP - Lab ID #108996  
NY State DOH ELAP - Lab ID #11564  
State of Ohio - Lab ID # 10942

Analyst Signature



# Appendix C

## STATEMENTS ON THE EXISTENCE OF LEAD HAZARDS

 Jerramiah T. Healy CITY OF JERSEY CITY	<p>DEPARTMENT OF HOUSING, ECONOMIC DEVELOPMENT AND COMMERCE Division of Community Development 30 Montgomery Street, Jersey City, NJ 07302-3821 Phone: (201) 547-4747 Fax: (201) 547-5104</p>
<b>HOMEOWNER REBATE PROGRAM</b>	
CASE NO.:	<u>HRP-2011-</u> [REDACTED]
HOMEOWNER:	[REDACTED]
ADDRESS:	[REDACTED]
TELEPHONE:	[REDACTED]
DATE:	<u>10/17/12</u>
SUBJECT:	<u>Lead Based Paint Hazards</u>
 <b>I. PRIOR TO REHAB:</b>	
B. <u>Lead Based Paint Hazards</u> Do ( ) Do Not ( ) exist based on the initial Risk Assessment inspection	
<u>[REDACTED]</u> Inspector	<u>10/14/12</u> Inspection Date
 <b>II</b>	
<b>UPON COMPLETION OF REHAB:</b>	
B. <u>Lead Based Paint Hazards</u> Do ( ) Do Not ( ) exist based on final inspection and clearance	
<u>[REDACTED]</u> Inspector	<u>10/14/12</u> Inspection Date
HRP-P3 REV. 10/12/12	



Jerramiah T. Healy  
CITY OF JERSEY CITY

DEPARTMENT OF  
HOUSING, ECONOMIC DEVELOPMENT AND COMMERCE  
Division of Community Development

30 Montgomery Street, Jersey City, NJ 07302-3821  
Phone: (201) 547-4747  
Fax: (201) 547-5104

HOMEOWNER REBATE PROGRAM

CASE NO.: HOORP-2011- [REDACTED]  
HOMEOWNER: [REDACTED]  
ADDRESS: [REDACTED]  
TELEPHONE: [REDACTED]  
DATE: 12/15/11  
SUBJECT: HUD HOUSING QUALITY STANDARDS

I. PRIOR TO REHAB:

A. This Property Does ( ) Does Not (x) meet the Section 8 Housing Quality Standards.

[REDACTED] 1/7-21-2012  
Inspector Inspection Date

B. Lead Based Paint Hazards Do ( ) Do Not (x) exist based on the initial Risk Assessment inspection

[REDACTED] 2/22/12  
Inspector Inspection Date

II. UPON COMPLETION OF REHAB:

A. The items of work completed with the funds available for the Property Do ( ) Do Not ( ) meet with Section 8 Housing Quality Standards.

[REDACTED] 4/30/2012  
Inspector Inspection Date

B. Lead Based Paint Hazards Do (x) Do Not ( ) exist based on final inspection and clearance.

[REDACTED] 4/30/12  
Inspector Inspection Date

HRP-P3-revised 1/10



Jerramiah T. Healy  
CITY OF JERSEY CITY

DEPARTMENT OF  
HOUSING, ECONOMIC DEVELOPMENT AND COMMERCE  
Division of Community Development

30 Montgomery Street, Jersey City, NJ 07302-3821  
Phone: (201) 547-4747  
Fax: (201) 547-5104

HOMEOWNER REBATE PROGRAM

CASE NO.:

*HORP-2011-*

HOMEOWNER:

ADDRESS:

TELEPHONE:

DATE:

*December 2011*

SUBJECT:

Lead Based Paint Hazards

I. PRIOR TO REHAB:

B. Lead Based Paint Hazards Do ( ) Do Not ( ) exist based on the initial Risk Assessment inspection.

Inspector

1/24/12  
Inspection Date

II

UPON COMPLETION OF REHAB:

B. Lead Based Paint Hazards Do ( ) Do Not ( ) exist based on final inspection and clearance.

Inspector

10/9/12  
Inspection Date

HRP-P3

## Appendix D

### INCOMPLETE INITIAL LEAD RISK ASSESSMENT REPORT

Address: [REDACTED] Date: 2-22-12

1<sup>ST</sup> Floor and 2<sup>ND</sup> Floor is wood paneling because no lead was found.

- Note : No lead found on 1<sup>st</sup> and 2<sup>nd</sup> floor
- 2<sup>nd</sup> floor bedroom 1 replace door 6.1 UG
- 2<sup>nd</sup> floor bedroom 2 replace door 5.8 UG
- 2<sup>nd</sup> floor bedroom 3 replace door 6.8 UG
- The door to the attic needs to be replaced 7.25 UG
- Basement stairs need to be replaced and need paint and scrap 14.9 UG

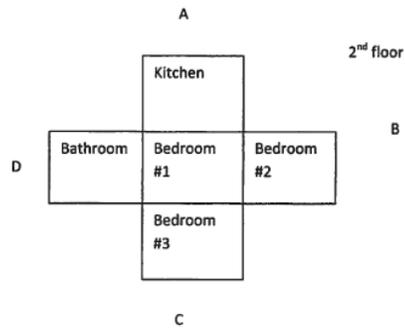
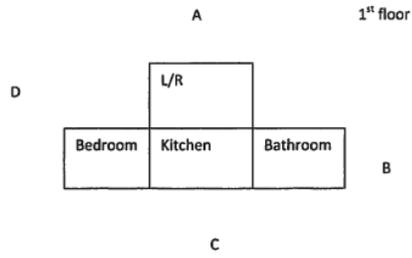
Address: [REDACTED]

Date: 2-22-12

Test#	Location(room)	Wall (A-D)	Structure wall,door,window,or ceiling	Component Casing,jamb,sash,sill apron etc	Paint Condition Intact fair or poor	Substrate	XRF RESULT mg/cm2	Method of L.H.R
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								

- Note : No lead found on 1<sup>st</sup> and 2<sup>nd</sup> floor
- 2<sup>nd</sup> floor bedroom 1 replace door 6.1 UG
- 2<sup>nd</sup> floor bedroom 2 replace door 5.8 UG
- 2<sup>nd</sup> floor bedroom 3 replace door 6.8 UG
- The door to the attic needs to be replaced 7.25 UG
- Basement stairs need to be replaced and need paint and scrap 14.9 UG

Address: [REDACTED] Date: 2-22-12



# Appendix E

## LAB CERTIFICATES OF LEAD DUST ANALYSIS



**Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082**

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Client: Jersey City Division of Community Development  
 30 Montgomery St., Room 404  
 Jersey City NJ 07302-  
 AAT Project #: 135445

Attn: [Redacted]  
 Ph: [Redacted]  
 Email: [Redacted]

Sampling Date: 9/21/2012  
 Date Received: 9/25/2012  
 Date Analyzed: 9/28/2012  
 Date Reported: 9/28/2012

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**Project Location:** [Redacted]  
**Comments:** also email to: [Redacted]

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Lab ID#	Client Code	Sample Description	Length (inches)	Width (inches)	Area (Sq Ft)	Results Lead ug/ft2 *	Analyst
1365106	JMS-1	1ST FL LIVE RM WS	18	2	0.25	< 40	ND
1365107	JMS-2	1ST FL KIT WS	18	2	0.25	146.00	ND
1365108	JMS-3	1ST FL BATH WS	18	2	0.25	446.00	ND
1365109	JMS-4	2ND FL BED1 WS	18	2	0.25	346.00	ND
1365110	JMS-5	2ND FL BED2 WS	18	2	0.25	94.60	ND
1365111	JMS-6	2ND FL BED WS	18	2	0.25	< 40	ND

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(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft2 (Floors Carpeted/uncarpeted), 250ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough /Well/Ext Concrete Surfaces) The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP, LLC  
 ACCREDITED LABORATORY  
 ENHANCED ISO 17025  
 www.ohioelap.com  
 AIHA ELAP Lab ID #10956  
 NY State DOH ELAP Lab ID #11864  
 State of Ohio Lab ID #10942

Analyst Signature [Redacted]

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Date Printed: 09/28/2012 15:54      AAT Project #: 135445      Page 1 of 1



Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

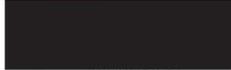
Client: Jersey City Division of Community Development  
30 Montgomery St., Room 404  
Jersey City, NJ 07302

AAT Project: 166254  
Sampling Date: 10/03/2013  
Date Received: 10/07/2013  
Date Analyzed: 10/09/2013  
Date Reported: 10/09/2013  
Analyst: [Redacted]

Attn: [Redacted] Email: [Redacted]  
Phone: [Redacted] Fax: [Redacted]

Client Project: [Redacted]  
Project Location: [Redacted]

Lab Sample ID	Client Code	Sample Description	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead $\mu\text{g}/\text{ft}^2$ *
1653283	JER-1	1st FL L-Room WS	2	18	0.25	<40.00
1653284	JER-2	1st FL Bed-Room WS	2	18	0.25	<40.00
1653285	JER-3	1st FL Kitchen WS	2	18	0.25	<40.00
1653286	JER-4	2nd FL Bath Room WS	2	18	0.25	<40.00
1653287	JER-5	2nd FL Bed-Room WS	2	18	0.25	<40.00
1653288	JER-6	2nd FL L-Room WS	2	18	0.25	<40.00



Analyst Signature

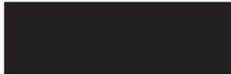
IPD-Not Detected, Not Not Available, RL Reporting Limit, Analytical Reporting Limit is 10  $\mu\text{g}/\text{sample}$  \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40  $\mu\text{g}/\text{ft}^2$  (Floors, Carpets/Carpeting), 250  $\mu\text{g}/\text{ft}^2$  (Window Sills/Boards), 400  $\mu\text{g}/\text{ft}^2$  (Window Sill/Exposed Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT, LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as



AIHA ELAP: Lab ID #100586, NY State DOH ELAP: Lab ID #11864, State of Ohio: Lab ID # 10942

Date Printed: 10/09/2013 1:13PM

AAT Project: 166254



**Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082**

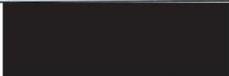
**Client :** Jersey City Division of Community Development  
 30 Montgomery St., Room 404  
 Jersey City, NJ 7302

**AAT Project :** 154669  
**Sampling Date :** 05/04/2013  
**Date Received :** 05/04/2013  
**Date Analyzed :** 05/10/2013  
**Date Reported :** 05/10/2013

**Attn :** [Redacted] **Email :** [Redacted]  
**Phone :** [Redacted] **Fax :** [Redacted]

**Project Location :** [Redacted]  
**Client Project :** [Redacted]

Lab Sample ID	Client Code	Sample Description	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead µg/ft <sup>2</sup> *
1547101	JCM-1	1ST FL L-ROOM	2	18	0.25	<40.00
1547102	JCM-2	1ST FL KITCHEN	2	18	0.25	<40.00
1547103	JCM-3	1ST FL REAR BDRM	2	18	0.25	<40.00
1547104	JCM-4	2ND FL L-ROOM	2	18	0.25	<40.00
1547105	JCM-5	2ND FL KITCHEN	2	18	0.25	<40.00
1547106	JCM-6	2ND FL REAR BDRM	2	18	0.25	<40.00



Analyst Signature

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 µg/m<sup>2</sup>) \* For low values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA, HUD Regulatory Limits: 40 µg/ft<sup>2</sup> (Floor, Carpet, Driveways), 250 µg/ft<sup>2</sup> (Window Sill/Slots), 400 µg/ft<sup>2</sup> (Window Trough, Wall/Ext. Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT, LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as



AHA ELAP: Lab ID #100066, NY State DOH ELAP: Lab ID #11504, State of Ohio: Lab ID #11042

Date Printed: 05/10/2013 3:27PM

AAT Project: 154669



Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

Client: Jersey City Division of Community Development  
30 Montgomery St., Room 404  
Jersey City NJ 07302-

AAT Project #: 129075  
Client Project: [Redacted]  
Sampling Date: 7/11/2012  
Date Received: 7/12/2012  
Date Analyzed: 7/17/2012  
Date Reported: 7/17/2012

Attn: [Redacted]  
Ph: [Redacted] Fax: [Redacted]  
Email: [Redacted]

Project Location: [Redacted]  
Comments:

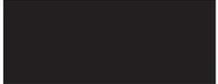
Lab ID#	Client Code	Sample Description	Length (Inches)	Width (Inches)	Area (Sq Ft)	Results Lead ug/ft2 *	Analyst
1303099	JEF 1	LV RM WS	18	2	0.25	< 40	ND
1303100	JEF 2	KITCHEN WS	18	2	0.25	< 40	ND
1303101	JEF 3	DN RM WS	18	2	0.25	< 40	ND
1303102	JEF 4	BD RM 1 WS	18	2	0.25	< 40	ND
1303103	JEF 5	BD RM 2 WS	18	2	0.25	< 40	ND
1303104	JEF 6	TV RM WS	18	2	0.25	< 40	ND

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft2 (Floors Carpeted/uncarpeted), 250ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough /Well/Ext Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP: Lab ID #100986  
NY State DOH ELAP: Lab ID #13864  
State of Ohio: Lab ID # 10042

Analyst Signature





Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

Client: Jersey City Division of Community Development  
30 Montgomery St., Room 404  
Jersey City NJ 07302

AAT Project #: 123488  
Client Project: [Redacted]  
Sampling Date: 4/30/2012  
Date Received: 5/1/2012  
Date Analyzed: 5/4/2012  
Date Reported: 5/4/2012

Attn: [Redacted]  
Ph: [Redacted] Fax: [Redacted]  
Email: [Redacted]

Project Location: [Redacted]

Comments:

Lab ID#	Client Code	Sample Description	Length (inches)	Width (inches)	Area (Sq Ft)	Results Lead µg/ft2 *	Analyst
1248753	JCW-1	1ST LIVING RM WS	18	2	0.25	< 40	TG
1248754	JCW-2	1ST LIVING RM W2 WS	18	2	0.25	< 40	TG
1248755	JCW-3	1ST KITCHEN W1 WS	18	2	0.25	< 40	TG
1248756	JCW-4	1ST KITCHEN W2 WS	18	2	0.25	< 40	TG
1248757	JCW-5	2ND FLR W LIVING FL WS	18	2	0.25	< 40	TG
1248758	JCW-6	2ND FLR BEDRM WS	18	2	0.25	< 40	TG

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft2 (Floors Carpeted/uncarpeted), 250ug/ft2 (Window Sill/Stools), 400 ug/ft2 (Window Trough /Well/Ext Concrete Surfaces) The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP Lab ID #100966  
NY State DOH ELAP Lab ID #11864  
State of Ohio Lab ID # 19642

Analyst Signature



Date 1st Printed: 05/04/12

AAT Project #: 123488

Page 1 of 1

Revised Printing: 05/04/2012 14:54



Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

Client: Jersey City Division of Community Development
30 Montgomery St., Room 404
Jersey City, NJ 7302

AAT Project: 172683
Sampling Date: 12/06/2013
Date Received: 12/13/2013
Date Analyzed: 12/17/2013
Date Reported: 12/17/2013 7:08:37AM
Analyst: [Redacted]

Attn: [Redacted] Email: [Redacted]
Phone: [Redacted] Fax: [Redacted]
Client Project: [Redacted]
Project Location: [Redacted]

Table with 7 columns: Lab Sample ID, Client Code, Sample Description, Length (inch), Width (inch), Area (Sq ft), Results Lead (ug/ft2). Rows include 1711528, 1711529, 1711530, 1711531, 1711532, 1711533.



Analyst Signature

ND=Not Detected, N/A=Not Available, RL=Reporting Limit, Analytical Reporting Limit is 10-ug/sample. \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40ug/ft2 (Floors, Carpeted/carpets), 750ug/ft2 (Window Sills/Boards), 450ug/ft2 (Window, Tough, Metallic Concrete Surfaces). The laboratory operates in accord with ISO 17025 guidelines and holds limited scope of accreditation under AHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as

AHA (ELAP) Lab ID #100686, NY State DOH (ELAP) Lab ID #11964, State of Ohio Lab ID # 13042

Date Printed: 12/17/2013 7:07AM

AAT Project: 172683





12950 Haggerty Road  
 Belleville, MI 48111  
 Ph: (734) 699-1883; Fax: (734) 699-8407

**Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082**

Client : Jersey City Division of Community Development  
 30 Montgomery St., Room 404  
 Jersey City, NJ 07302

Attn : [Redacted] Email : [Redacted]  
 Phone : [Redacted] Fax : [Redacted]

Project Location : [Redacted]  
 Client Project : [Redacted]

AAT Project : 166831  
 Sampling Date : 10/08/2013  
 Date Received : 10/11/2013  
 Date Analyzed : 10/15/2013  
 Date Reported : 10/15/2013  
 Analyst : [Redacted]

Lab Sample ID	Client Code	Sample Description	Length (inch)	Width (inch)	Area (Sq ft)	Results Lead $\mu\text{g}/\text{ft}^2$ *
1658779	JEK-1	1ST FL L ROOM WS	18	2	0.25	<40.00
1658780	JEK-2	1ST FL KITCHEN WS	18	2	0.25	<40.00
1658781	JEK-3	1ST FL D ROOM WS	18	2	0.25	<40.00
1658782	JEK-4	2ND FL BED RM 1 WS	18	2	0.25	110.90
1658783	JEK-5	2ND FL BED RM 2 WS	18	2	0.25	60.44
1658784	JEK-6	WS	18	2	0.25	<40.00

[Redacted Signature]

Analyst Signature

(ND)=Not Detected, N/A=Not Available, RL=Reporting Limit, Analytical Reporting Limit is 10  $\mu\text{g}/\text{sample}$  \* For low values assume (2) significant figures. The method and 80% GC is acceptable unless otherwise stated. EPA HLD Regulatory Limits: 40  $\mu\text{g}/\text{ft}^2$  (floors, Carpeted/uncarpeted), 250  $\mu\text{g}/\text{ft}^2$  (Window Sill/Siding), 400  $\mu\text{g}/\text{ft}^2$  (Window Trough, Mill/Ed Concrete Surfaces). The laboratory operates in accord with ISO 15025 guidelines and holds limited scope of accreditation under AHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as



AHA-ELAP: Lab ID #102096, NY State DOH ELAP: Lab ID #11964, State of Ohio: Lab ID # 10042

Date Printed: 10/15/2013 6:32PM

AAT Project: 166831



Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

Client: Jersey City Division of Community Development  
30 Montgomery St., Room 404  
Jersey City NJ 07302-

AAT Project # : 118903  
Client Project: [Redacted]  
Sampling Date: 2/24/2012  
Date Received: 2/27/2012  
Date Analyzed: 2/29/2012  
Date Reported 3/1/2012

Attn: [Redacted]  
Ph: [Redacted] Fax: [Redacted]  
Email: [Redacted]

Project Location: [Redacted]

Comments:

Lab ID#	Client Code	Sample Description	Length (Inches)	Width (Inches)	Area (Sq Ft)	Results	
						Lead $\mu\text{g}/\text{ft}^2$	Analyst
1203109	JEN 1	FRONT PORCH WS	18	2	0.25	135.00	BN
1203110	JEN 2	1ST FL LV RM WS	18	2	0.25	83.20	BN
1203111	JEN 3	1ST FL KITCHEN WS	18	2	0.25	< 40	BN
1203112	JEN 4	2ND FL BD RM 1 WS	18	2	0.25	< 40	BN
1203113	JEN 5	2ND FL BD RM 2 WS	18	2	0.25	< 40	BN
1203114	JEN 6	BASEMENT REAR DOOR WS	18	2	0.25	< 40	BN

(ND=Not Detected, N/A Not Available, RL Reporting Limit, Analytical Reporting Limit is 10 ug/sample) \* For true values assume (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limits: 40 ug/ft<sup>2</sup> (Floors Carpeted/uncarpeted), 250ug/ft<sup>2</sup> (Window Sill/Stools), 400 ug/ft<sup>2</sup> (Window Trough /Wall/Ext Concrete Surfaces) The laboratory operates in accord with ISO 17025 guidelines and holds limited scopes of accreditation under AIHA and NY State DOH ELAP programs. These results are submitted pursuant to AAT LLC current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. Analytical results relate to the samples as received by the lab. AAT will not assume any liability or responsibility for the manner in which the results are used or interpreted.



AIHA ELAP Lab ID #103903  
NY State DOH ELAP Lab ID #11804  
State of Ohio Lab ID # 16942

Analyst Signature

