



**Environmental Health and  
Safety Department**  
Lead Compliance Assurance Report  
Field Oversight

**June 15, 2021 – December 15, 2021**

## Executive Summary

As required by the HUD Agreement, the Environmental Health and Safety Department's ("EHS") Lead Oversight Team ("LOT") performs compliance assurance inspections of NYCHA personnel and vendors conducting Renovation, Repair, and Painting ("RRP") jobs, Lead Abatement, and Dust Wipe Clearance activities to ensure they are in compliance with HUD's Lead Safe Housing Rule, EPA's RRP Rule, and NYCHA's Lead Safe Housing Standard Procedure.

When non-compliance is observed, the LOT follows the EHS *Corrective Action and Escalation Protocols*. Guidance is provided to workers when required, and the LOT ensures immediate corrective actions are implemented, i.e. stopping non-compliant activities, notifying supervisors, and making the necessary adjustments to bring the activity into compliance. Additionally, some deficiencies/violations are escalated to the Compliance Department for further action. During this reporting period EHS identified 15 observations requiring escalation to the Compliance Department. Twelve of these escalations related to missing lead-disclosure documents in the Property Management offices. The escalation reports are attached.

## LOT Key Updates and Highlights

### **Vendor RRP Oversight**

During the reporting period LOT only observed one RRP job that was performed by a vendor. LOT continues to have difficulties with identifying RRP vendor jobs through Maximo as the scheduling information is not accurate or the work orders may not be created in Maximo in advance of the work. LOT also attempts to locate vendor RRP jobs by reviewing the contractor log at the developments. However, it is found most times that vendors fail to sign the Contractor Log Book, making it difficult to find where they are working. LOT will continue to focus on identifying these jobs.

### **Visual Assessments**

During the reporting period, LOT resumed Visual Assessment (VA) QA oversight with the start of the second phase of VA. LOT had previously performed VA QA during the first phase, which was completed on June 30, 2021. To arrive at a qualitative assessment, the results of the Lead Hazard Control ("LHC") VA Inspection and LOT VA QA Inspection (which consist of five areas that are weighted differently) are compared to generate a quantitative score based on how well the results match. The assessments that score below the established threshold are reviewed and if applicable, provided to LHC for appropriate follow-up with the LHC inspector.

### **RRP Clearance Examinations**

LOT significantly increased the number of RRP clearance examinations observed during this reporting period in comparison to the previous 6-month reporting period by 143

inspections. This increase was a direct result of the targeted effort by LOT to ensure NYCHA’s compliance with DOHMH's modification of the application of certain Health Code provisions.

**Compliance Assurance Vendors**

The compliance assurance contracts are in the process of being amended to create separate line items for storeroom and LDD inspections and RRP work observation. This will allow greater flexibility in assigning work and increased coverage of storeroom and LDD inspections.

**EH&S Lead Oversight Activity Summary  
June 15, 2021 – December 15, 2021**

<b>Field Oversight Activity</b>	<b># of Observations Conducted</b>	<b>Avg. Monthly Compliance Rate</b>	<b># of Observations Escalated</b>
Storeroom Inspection	201	96.22%	0
Management Office Lead Disclosure Review	195	77.32%	12
RRP <sup>1</sup>	557	100%	0
Lead Abatement	336	99.93%	2
Post-RRP Clearance	175	99.38%	2
Post-Lead Abatement Clearance	188	100%	0

<b>Inspection</b>	<b># Observations</b>	<b># Requiring LHC Review/Re-assessment</b>
Visual Assessment (VA)	132	8

**A. RRP Storeroom & Lead Disclosure Compliance**

<b>Task/Area Assessed</b>	<b>June – December 2021</b>
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<sup>1</sup> Specialist incorrectly documented “T1-Q2. Did You See RRP Related Work” in two (2) non-RRP jobs. If the data were corrected in Maximo the correct observation would have been 557.

	<b># Inspections Completed</b>	<b>#Failed Inspections</b>	<b>Compliance Rate</b>
Storeroom Inspections	201	11	94.53%
Property Management Lead Disclosure Files	195	43	77.95%

**Missing Supplies**

<b>Missing Supply</b>	<b># Occurrences</b>
Utility Knife	5
6 mil polyethylene sheeting	4
Face masks	3
Supply Kit	3

Note:

- LOT inspected 201 Storerooms, (108 unique storerooms) reporting a 94.53% compliance rate. Of the 108 inspections, 10 storerooms failed due to the missing supplies. Of the 10, 9 were re-inspected during the reporting period and passed the subsequent re-inspection. The remaining storeroom will be re-inspected during the next reporting period and the results will be reported in the next report.
- Of the 195 inspections conducted for the required Lead Disclosure Files, 43 failed, reporting a 77.95% compliance rate. The Neighborhood Administrators and Property Management staff were notified and provided with guidance regarding NYCHA's Lead Disclosure recordkeeping requirements. Of the 43 failed inspections, twelve (12) were identified for escalation to the Compliance Department due to a failed reinspection. See Appendix A - C: Lead Disclosure Escalation reports and Memo.

## B. Renovation, Repair and Painting (“RRP”) Compliance

Task/Area Assessed	June - December 2021		
	# Observations	Deficiencies	Compliance Rate
NYCHA Form 060.632, The Lead-safe Certified Guide to Renovate Right <sup>2</sup>	557	0	100%
NYCHA Personnel <sup>3</sup> Certifications	847	0	100%
Signage <sup>4</sup>	556	0	100%
Worksite Preparation <sup>5</sup>	363	0	100%
Work Activities	418	0	100%
Cleanup Activities	110	0	100%
Cleanup Verification	116	0	100%

## C. Lead Abatement Compliance

Task/Area Assessed	June – December 2021		
	# Observations	Deficiencies	Compliance Rate
Occupant Protection Plan	336	1	99.70%
Signage	336	1	99.70%
EPA Notice of Commencement	336	0	100%
Lead Abatement Supervisor	336	0	100%
Task/Area Assessed	June – December 2021		
	# Observations	Deficiencies	Compliance Rate
Work Area Preparation & Containment	199	0	100%
Work Activities	225	0	100%
Cleanup Activity	152	0	100%

<sup>2</sup> Specialist incorrectly documented “NYCHA Form 060.632, The Lead-safe Certified Guide to Renovate Right” in five (5) non-RRP jobs. If the data were corrected in Maximo, the correct observation would have been 557.

<sup>3</sup> Specialist incorrectly documented NYCHA employees in four (4) jobs, of which two (2) were documented in non RRP jobs. If the data were corrected in Maximo the correct observation would have been 847.

<sup>4</sup> Specialist incorrectly documented signage in two (2) non-RRP jobs. If the data were corrected in Maximo the correct observation would have been 556.

<sup>5</sup> Specialist incorrectly documented “T2-Q1. Did you see Worksite Preparation phase?” as yes in one (1) non-RRP job. If the data were corrected in Maximo the correct observation would have been 363.

## D. Clearance Examinations Compliance Assurance

Tasks/Areas Assessed	June - December 2021		
	# Observations	Deficiencies	Compliance Rate
Timing between cleanup completion and clearance examination <sup>6</sup>	363	0	100%
NYCHA Personnel Certifications <sup>7</sup>	168	0	100%
Vendor Personnel Certifications <sup>8</sup>	195	0	100%
Visual Inspection	363	2	99.45%
Sample Collections	362	0	100%

### NYCHA Certified Personnel

Type of Certified Personnel	Post RRP	Post Abatement
Dust Wipe Technician	146	0
Certified Risk Assessor	1	3
Lead based Paint Inspector	0	18

### Vendor Certified Personnel

Type of Certified Personnel	Post RRP	Post Abatement
Dust Wipe Technician <sup>9</sup>	20	0
Certified Risk Assessor <sup>10</sup>	2	136
Lead based Paint Inspector	6	31

<sup>6</sup> Specialist incorrectly documented the “Timing between cleanup completion and clearance examination” phase in one (1) job. If the data were corrected in Maximo the correct observation would have been 363.

<sup>7</sup> Specialist incorrectly captured the Vendor as NYCHA employee in eight (8) jobs. If the data were corrected in Maximo the correct observation would have been 168.

<sup>8</sup> Specialist incorrectly captured the Vendor in nine (9) jobs. If the data were corrected in Maximo the correct observation would have been 195.

<sup>9</sup> Specialist incorrectly captured the Dust Wipe Technician in two Post Abatement jobs. If the data were corrected in Maximo the correct observation would have been 0.

<sup>10</sup> Specialist incorrectly captured the Certified Risk Assessor as Dust Sampling Technicians in two in Post RRP jobs. If the data were corrected in Maximo the correct observation would have been 2 and Specialist incorrectly documented vendor as NYCHA in 8 Post Abatement jobs. If the data were corrected in Maximo the correct observation would have been 136.

## E. Visual Assessment (VA)

Inspection	# Observations	# Requiring LHC Review/Re-assessment
Visual Assessment (VA)	132	8

Note:

- The eight (8) jobs were submitted to LHC for further review to determine if a re-assessment is required.

Exhibit A: LOT Escalation Report (June 2021 – December 2021)



Environmental Health & Safety Department

EHU OVERSIGHT ESCALATION REPORT			
1. VENDOR or NYCHA PERSONNEL? <b>NYCHA</b>	2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) <b>MONA SUMPTER 18924</b>	3. TYPE OF JOB <b>ASSISTANT PROPERTY MANAGER</b>	4. EHS INSPECTION WO# <b>82380342</b>
		5. CM WO#	
6. ADMINISTERING DEPARTMENT <b>BROOKLYN PROPERTY MANAGEMENT DEPARTMENT</b>	7. DEVELOPMENT: <b>INGERSOLL</b>	8. OBSERVATION ADDRESS <b>102 MONUMENT WALK BROOKLYN, NY 11201</b>	
9. DEFICIENCY: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR			
10. INCIDENT DESCRIPTION: On 07/02/2021 at 9 am, LOTS arrived to the development to conduct a RRP supplies in the storeroom and a re-inspection lead disclosure documentation in the management office inspection at 102 Monument Walk, Brooklyn NY 11201. The Development first failed the Lead Disclosure Document inspection on 5/14/2021. LOTS met with the assistant property manager Mona Sumpter (718-6247316), who stated that she does not have the development lead disclosure documentation at this time. Ms. Sumpter directed LOTS to the maintenance area and suggested to inquire to the assistant superintendent Williams Davis NYCHA ID #9791, who stated that the development superintendent is on vacation at this time and he does not know where the development lead disclosure documentation is being stored.			
11. CORRECTIVE ACTION TAKEN: (Describe what was done after you observed the deficiency, was this reported to the job supervisor, were the corrective actions implemented, did you remain onsite to see completion?) LOTS immediately notified LOTA about not able to review the development lead disclosure documents at this time and waiting for further instructions. The Development first failed the Lead Disclosure Document inspection on 5/14/2021. The LOTA sent an email to the Neighborhood Administrator and Property Manager providing guidance on how to obtain the missing documents.			





## Environmental Health & Safety Department

12. PHOTOS:		
13. EHS PERSONNEL/EHS VENDOR		
NAME:		DATE & TIME OF OBSERVATION:
John Ospina <small>Digitally signed by John Ospina DN: cn=John Ospina, o=Environmental Health and Safety, ou=EH&amp;S/Health/Team, email=John.Ospina@nycha.nyc.gov, serial=2021.07.02.06.14:00-0457</small>		07/02/2021
14. ADDITIONAL INFORMATION (provide any other information that may be of importance)		
No Property Manager at this time.		

## Exhibit B: LOT Escalation Memo (June – December 2021)



### Environmental Health & Safety Department

**To:** Daniel Greene, Chief Compliance Officer  
**From:** Patrick O'Hagan, Environmental Health & Safety Officer  
**Date:** November 19, 2021  
**Re:** Lead Disclosure Document Re-Inspection Failures (Sept & Oct 2021)

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in September and October 2021. If a development was missing some or all of the required documents, the development was re-inspected after approximately 10 business days. During the review, LOT confirms that hardcopies of the following documents are present in a development's Lead Disclosure folders:

- NYCHA Form 060.275D, Lead-Based Paint Development Disclosure Summary
- NYCHA Form 060.275A, Lead-Based Paint Unit Disclosure Summary
- NYCHA Form 060.275, Disclosure of Information on Lead-Based Paint and/or Lead Based Paint Hazards
- EPA "Protect Your Family from Lead" Pamphlet

Table 1 below summarizes those developments that failed the first inspection and the results of re-inspections in September and October 2021. When developments fail the first inspection, LOTS provide copies of the LDD QRG and instructions on how to obtain assistance to retrieve the documents. Recently, LOT began issuing instructions for retrieving lead disclosure documents from Siebel. These instructions were provided to EHS by Healthy Homes. Please also note that Jackson/MAR was previously escalated to the Compliance Department for non-compliance with the LDD requirements in April 2021.

Table 1. Summary of Developments Requiring Re-Inspection

Development	First Inspection Date	Re-Inspection Date	Passed Re-Inspection
Millbrook	8/12/2021	9/14/2021	Yes
Douglass 1	8/13/2021	9/21/2021	No
Tompkins	8/18/2021	9/14/2021	Yes
Bushwick <sup>1</sup>	9/20/2021	10/13/2021	No
Berry	9/21/2021	10/14/2021	No
Fort Independence	9/21/2021	10/18/2021	Yes
West Brighton	9/21/2021	10/14/2021	No
Richmond Terrace	9/21/2021	10/14/2021	Yes
Beach 41 <sup>st</sup> Street/Ocean Bay Apartments	9/23/2021	10/20/2021	No
Jackson/Morrisania Air Rights	10/7/2021	10/28/2021	No

Notes:

<sup>1</sup>Included in Bushwick Onsite Monitoring Report.

## Exhibit C: LOT Escalation Memo (June – December 2021)



### Environmental Health & Safety Department

**To:** Dan Greene, Chief Compliance Officer  
**From:** Patrick O'Hagan, VP, Environmental Health and Safety Officer|  
**Date:** January 10, 2022  
**Re:** Lead Disclosure Document Re-Inspection Failures (Nov & Dec 2021)

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in November and December 2021. If a development was missing some or all of the required documents, the development was re-inspected after approximately 10 business days. During the review, LOT confirms that hardcopies of the following documents are present in a development's Lead Disclosure folders:

- NYCHA Form 060.275D, Lead-Based Paint Development Disclosure Summary
- NYCHA Form 060.275A, Lead-Based Paint Unit Disclosure Summary
- NYCHA Form 060.275, Disclosure of Information on Lead-Based Paint and/or Lead Based Paint Hazards
- EPA "Protect Your Family from Lead" Pamphlet

Table 1 below summarizes those developments that failed the first inspection and the results of re-inspections in November and December 2021. When developments fail the first inspection, LOTS provide copies of the LDD QRG and instructions on how to obtain assistance to retrieve the documents. Recently, LOT began issuing instructions for retrieving lead disclosure documents from Siebel. These instructions were provided to EHS by Healthy Homes.

Table 1. Summary of Developments Requiring Re-Inspection

Development	First Inspection Date	Re-Inspection Date	Passed Re-Inspection
Borinquen Plaza	10/13/2021	11/4/2021	No
Rutgers	11/8/2021	12/8/2021	No
Gompers	11/18/2021	12/8/2021	No
King Towers	11/8/2021	12/8/2021	No
Drew Hamilton	11/8/2021	12/8/2021	No

**Exhibit D: LOT Escalation Report (June – December 2021)**



**Environmental Health & Safety Department**

12. PHOTOS:	
13. EHS PERSONNEL/EHS VENDOR	
Mith Jennifer Jean	
NAME:	DATE & TIME OF OBSERVATION:
<input type="text" value=""/>	9/3/21
14. ADDITIONAL INFORMATION (provide any other information that may be of importance)	

**Exhibit E: LOT Escalation Report (June – December 2021)**



**Environmental Health & Safety Department**

EHU OVERSIGHT ESCALATION REPORT			
1. VENDOR or NYCHA PERSONNEL? NYCHA PERSONNEL	2. VENDOR/NAME(S) OF NYCHA PERSONNEL (If Vendor also indicate company name) JACOB NEAL	3. TYPE OF JOB LEAD ABATEMENT INSPECTION	4. EHS INSPECTION WO# 84339038
			5. CM WO# 84224001
6. ADMINISTERING DEPARTMENT LEAD HAZARD CONTROL	7. DEVELOPMENT: MANHATTANVILLE	8. OBSERVATION ADDRESS 3250 BROADWAY UNIT 13F	
9. DEFICIENCY: <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR			
10. INCIDENT DESCRIPTION: ON 10/13/2021, A LEAD COMPLIANCE INSPECTION WAS COMPLETED AT 3250 BROADWAY UNIT 13F IN THE MANHATTANVILLE DEVELOPMENT. THE OCCUPANT PROTECTION PLAN POSTED IN THE BUILDING LOBBY AND ENTRANCE TO THE APARTMENT DID NOT MATCH THE OCCUPANCY STATUS OF UNIT WHICH WAS VACANT AT TIME OF ABATEMENT. THE INCORRECT LEAD HAZARD WARNING SIGN WAS ALSO POSTED. THE WARNING SIGN DID NOT MENTION THE PRESENCE OF POISON.			
11. CORRECTIVE ACTION TAKEN: (Describe what was done after you observed the deficiency, was this reported to the job supervisor, were the corrective actions implemented, did you remain onsite to see completion?) THE DEFICIENCIES WERE REPORTED TO SUPERVISOR JACOB NEAL. HE WAS ABLE TO OBTAIN THE PROPER WARNING SIGNS FOR BOTH THE LOBBY AND THE WORK AREA UNIT. THE OCCUPANT PROTECTION PLAN WAS NOT AMENDED OR REPLACED DURING THE TIME OF THE INSPECTION PERFORMED BY THE LEAD COMPLIANCE ASSURANCE VENDOR.			



## Environmental Health & Safety Department

12. PHOTOS:	
13. EHS PERSONNEL/EHS VENDOR <b>MITH JENNIFER JEAN</b>	
NAME: <b>MITH</b>	DATE & TIME OF OBSERVATION: <b>10/13/2021 11:30 AM</b>
14. ADDITIONAL INFORMATION (provide any other information that may be of importance)	



**Exhibit F: LOT Escalation Report (June – December 2021)**



**Environmental Health & Safety Department**

EHU OVERSIGHT ESCALATION REPORT			
1. VENDOR or NYCHA PERSONNEL? <b>VENDOR</b>	2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) <b>JERRY JOHNSON</b>	3. TYPE OF JOB <b>RRP DUSTWIPE</b>	4. EHS INSPECTION WO# <b>84417677</b>
			5. CM WO# <b>83877236</b>
6. ADMINISTERING DEPARTMENT <b>LEAD HAZARD CONTROL</b>	7. DEVELOPMENT: <b>LINCOLN</b>	8. OBSERVATION ADDRESS <b>2101 MADISON AVE 8G</b>	
9. DEFICIENCY: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR			
<p>10. INCIDENT DESCRIPTION:</p> <p>During an observation of dust wipe sampling for post RRP clearance at the referenced location, there was a violation of the following section of the NYCHA Lead Safe Housing Standard Procedure:</p> <ul style="list-style-type: none"> <li>Section VII.H.4. - "If the certified inspector or risk assessor determines the apartment did not pass the visual inspection: They inform the certified abatement supervisor."</li> </ul> <p>EH&amp;S' Lead Compliance Assurance Consultant (LCAC), Jennifer Mith (UNYSE), observed the following on 10/18/2021 at 3:00pm:</p> <p>Observed an RRP Dust wipe performed by Jerry Johnson Lead Inspector (LBP-I-222842-1) Mr. Johnson stated and recorded that the Kitchen window to be tested failed the visual inspection. The window had dirt and dust in the well and sill. A total of 4 Samples were taken which consisted of the window well, sill, and floor near the window. There was no adjacent and a blank used. Since he proceeded to take samples, LCAC observed the remainder of the inspection and answered "NO" to the question, Did the clearance area pass the visual inspection? (Area/unit must pass a visual inspection before samples can be collected) The LCAC proceeded to answer follow up questions as "pass". This is incorrect. This violates "If the certified inspector or risk assessor determines the apartment did not pass the visual inspection: They inform the certified abatement supervisor."</p>			
<p>11. CORRECTIVE ACTION TAKEN:</p> <p>(Describe what was done after you observed the deficiency, was this reported to the job supervisor, were the corrective actions implemented, did you remain onsite to see completion?)</p> <p>The LOTA spoke to LCAC who stated this was the first time she encountered such incident and was not certain of correction action that was required. LCAC was instructed going forward the LOTA must be contacted immediately for directives. LCAC supervisor Andrew Mclellan was notified via email. LOTA spoke to the Lead Inspector supervisor, Roger Garcia at Genesis Dust Testing Company and was informed that the certified inspector determined apartment did not pass the visual inspection and failed to inform the certified abatement supervisor as per NYCHA Lead Safe Housing Standard Procedure. Area/unit must pass a visual inspection before samples can be collected. Mr. Garcia stated that LHC personnel are aware of this issue as it occurs frequently.</p>			



## Environmental Health & Safety Department

12. PHOTOS:	
13. EHS PERSONNEL/EHS VENDOR MITH JENNIFER JEAN	
NAME: <input type="text"/>	DATE & TIME OF OBSERVATION: OCTOBER 18 2021 3:00 PM
14. ADDITIONAL INFORMATION (provide any other information that may be of importance)	



# Exhibit G: LOT Escalation Report (June – December 2021)



## Environmental Health & Safety Department

EHU OVERSIGHT ESCALATION REPORT			
1. VENDOR or NYCHA PERSONNEL? <b>VENDOR</b>	2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) Yoel Henriquez Lead Inspector Cert. #LII-21-4499	3. TYPE OF JOB Post RRP Dustwipe	4. EHS INSPECTION WO# 84507561 5. CM WO# 64806468
6. ADMINISTERING DEPARTMENT LEAD Hazard Control	7. DEVELOPMENT: Albany Houses	8. OBSERVATION ADDRESS 193 Albany Avenue, 1H Brooklyn, NY 11213	
9. DEFICIENCY: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR			
<p>10. INCIDENT DESCRIPTION:</p> <p>During an observation of dust wipe sampling for post RRP job at the referenced location, there was a violation of the following section of the HUD guideline:</p> <p>24 CFR 35.1340 - CLEARANCE "If deteriorated paint or visible dust, debris or residue are present in areas subject to dust sampling, they must be eliminated prior to the continuation of clearance examination..."</p> <p>EHS&amp;S, Lead Oversight Team Specialist (LOTS), Chibuzor Nwabodo observed the following on 10/22/2021 at about 01:15pm:</p> <p>Observed post RRP Dust wipe sampling performed by Yoel Henriquez, Lead Inspector (LII-21-4499) a vendor dust wipe personnel from Genesis. Upon inquiry about the result of his visual inspection, Mr. Yoel Henriquez stated that he failed the entire Kitchen work area for visual inspection. He had already sampled window sill, window well and was in the process of collecting samples from the floor. LOTS informed him that he should not have proceeded to conduct clearance sampling if the visual inspection failed. He stated that his office asked them to collect samples regardless. LOTS asked Mr. Henriquez to stop further sampling and also informed him that it's against NYCHA Standard Procedure to conduct clearance when work area failed visual inspection.</p> <p>The following section of NYCHA Standard Procedure contains the directive on what to do if an RRP job fails visual inspection for clearance, SP 050.20.01, Lead Safe Housing Procedure, Section VIII.13.3(a)(ii): "If a dust wipe cannot be performed (e.g. because a surface is not clean, there is wet paint, etc.), then 'Failed Visual Paint' must be selected as the dust wipe result."</p> <p>LOTA was contacted and made aware of the situation and he directed that the vendor should not continue.</p>			
<p>11. CORRECTIVE ACTION TAKEN:</p> <p>(Describe what was done after you observed the deficiency, was this reported to the job supervisor, were the corrective actions implemented, did you remain onsite to see completion?)</p> <p>LOTA was contacted and he asked that the dust wipe personnel should not continue and reiterated that area/unit must pass a visual inspection before clearance samples can be collected.</p>			



## Environmental Health & Safety Department

12. PHOTOS:	
13. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo	
NAME: 	DATE & TIME OF OBSERVATION: OCTOBER 22, 2021@ 01:15 PM
14. ADDITIONAL INFORMATION (provide any other information that may be of importance)	