



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

December 16, 2021 – June 15, 2022

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, Visual Assessments, 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 26 observations requiring escalation to the Compliance Department. 16 of these escalations were 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 current reporting period LOT increased observations of vendors (10 this reporting period versus 1 during the prior reporting period) performing RRP. Of these, two resulted in escalations. LOT continues to focus their efforts on increasing the number of vendor related work and actively reviews Maximo for Vendor-RRP scheduling information and through the review of the contractor log at the developments while conducting oversight of NYCHA personnel. LOT will continue to focus on identifying these jobs for oversight.

Storeroom/Lead Disclosure Document Inspections

Effective January 2022, LOT increased the number of scheduled inspections of the storerooms and management offices. Previously storerooms and management offices were inspected if a Specialist or Compliance Assurance Vendor happened to be at a location to perform RRP oversight. The result was that some locations were inspected at a higher rate than others. During the first quarter of 2022 (January-March) LOT inspected 121 out of 135 locations. During the second quarter (April-June) LOT inspected 116 out of 135 locations.

IT – Maximo Enhancements/New Oversight Processes

During this reporting period LOT and IT finalized enhancements in Maximo to its inspection work orders for RRP, Storeroom/Lead-Disclosure Documents, and Dust-Wipes to better align with NYCHA process changes. Implementation of these enhancements began in May 2022.

LOT has developed new processes for the 2022 Visual Assessments and 2022 Risk Assessments.

IT completed the Visual Assessment process and LOT commenced oversight in March 2022. The Risk Assessment process is slated to be completed by IT in July 2022. Once this is done LOT will begin oversight of Risk Assessments.

EH&S Lead Oversight Activity Summary
December 16, 2021 – June 15, 2022

| Field Oversight Activity | # Observations | Total Compliance Rate | # of Jobs Escalated |
|--|-----------------------|------------------------------|----------------------------|
| Storeroom Inspection | 563 | 96.45% | 0 |
| Management Office Lead Disclosure Review | 554 | 80.14% | 16 |
| Tenant Folder Review | 12 | 100% | 0 |
| RRP | 725 | 98.34% | 7 |
| Lead Abatement | 303 | 98.68% | 2 |
| Post-RRP Clearance | 161 | 99.38% | 1 |
| Post-Lead Abatement Clearance | 102 | 100% | 0 |

| Inspection | # Observations | # Requiring LHC Review/Re-assessment |
|----------------------|-----------------------|---|
| Visual Assessment QA | 161 | 9 |

A. Storeroom & Lead Disclosure Compliance

| Task/Area Assessed | December 16, 2021 – June 15, 2022 | | |
|---|--|----------------------------|----------------------------|
| | # Inspections Completed | #Failed Inspections | Compliance Rate (%) |
| Storeroom Inspections | 563 | 20 | 96.45% |
| Property Management Lead Disclosure Files | 554 | 110 | 80.14% |
| Tenant Folder Review | 12 | 0 | 100% |

Missing Supplies

| <u>Missing Supply</u> | <u># Occurrences</u> |
|---------------------------------|----------------------|
| 6 mil polyethylene sheeting | 12 |
| 6 mil polyethylene bags | 3 |
| Duct Tape | 7 |
| Utility Knife | 3 |
| Paper Towel Rags | 2 |
| Tyvek Suits with Feet and Hoods | 1 |
| Warning Signs | 1 |

Notes:

- LOT inspected 563 Storerooms, (142 were unique storeroom locations) reporting a 96.45% compliance rate. Of the 142 unique storeroom inspections, 17 storerooms failed due to the missing supplies. Of the 17 failed inspections, 13 were re-inspected during the reporting period and passed the subsequent re-inspection. The remaining storerooms will be re-inspected during the next reporting period and the results will be reported in the next report.
- Of the 554 inspections conducted for the required Lead Disclosure Files, 110 failed, reporting an 80.14% compliance rate. The Neighborhood Administrators and Property Management staff were notified and provided with guidance regarding NYCHA's Lead Disclosure recordkeeping requirements. Of the 110 failed inspections, 16 were identified for escalation to the Compliance Department due to a failed reinspection.
- A data quality review revealed seven (7) Storeroom/Lead Disclosure Oversight Inspections with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

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

| Task/Area Assessed | December 16, 2021 – June 15, 2022 | | |
|---|-----------------------------------|--------------|---------------------|
| | # Observations | Deficiencies | Compliance Rate (%) |
| NYCHA Form 060.632, The Lead-safe Certified Guide to Renovate Right | 716 | 1 | 99.86% |
| NYCHA Personnel Certifications | 1,063 | 1 | 99.91% |
| Signage | 696 | 9 | 98.71% |
| Worksite Preparation | 488 | 5 | 98.98% |
| Work Activities | 521 | 4 | 99.23% |
| Cleanup Activities | 92 | 0 | 100% |
| Cleanup Verification | 84 | 0 | 100% |

Note:

- Of the 716 observed “NYCHA Form, 060.632” one (1) observation failed, reporting a 99.86% compliance rate.
- Of the 1,063 NYCHA personnel certifications one (1) failed, reporting a 99.91% compliance.
- Of the observed 696 signage, nine (9) failed, reporting 98.71% compliance rate.
- Of the 488 observed Worksite Preparation phase, five (5) failed, reporting a 98.98% compliance rate.
- Of the 521 observed Work Activities, four (4) failed, reporting a 99.23% compliance rate.
- A data quality review revealed 44 RRP Oversight Inspections with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

C. Lead Abatement Compliance

| Task/Area Assessed | December 16, 2021 – June 15, 2022 | | |
|----------------------------|-----------------------------------|--------------|-----------------|
| | # Observations | Deficiencies | Compliance Rate |
| Occupant Protection Plan | 303 | 1 | 99.67% |
| Signage | 303 | 0 | 100% |
| EPA Notice of Commencement | 303 | 3 | 99.01% |
| Lead Abatement Supervisor | 303 | 1 | 99.67% |

| Task/Area Assessed | December 16, 2021 – June 15, 2022 | | |
|-------------------------------------|-----------------------------------|--------------|-----------------|
| | # Observations | Deficiencies | Compliance Rate |
| Work Area Preparation & Containment | 186 | 0 | 100% |
| Work Activities | 166 | 0 | 100% |
| Cleanup Activity | 70 | 0 | 100% |

Note:

- Of the 303 observed Occupant Protection Plans, one (1) failed, reporting 99.67% compliance rate.
- Of the 303 observed EPA Notice of Commencement, three (3) failed, reporting 99.01% compliance rate. It was decided not to escalate these three (3) failures as there is no current wording in the Lead SP requiring the NOC be posted for the duration of the work, only 24-96 hours prior to the start of the work. LOT subsequently recommended to Compliance that language be added to the Lead SP stating that the NOC must remain posted for the duration of the work. Compliance agreed with this recommendation and language was added to require that “It must be posted at the entrance to the building and at the entrance of the specific apartment where work will take place for the duration of the work.”
- Out of the 303 observed Lead Abatement Supervisor, one (1) failed, reporting a 99.67% compliance rate.
- A data quality review revealed 13 Lead Abatement Oversight Inspections with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

D. Clearance Examinations Compliance

| Tasks/Areas Assessed | December 16, 2021 – June 15, 2022 | | |
|---|-----------------------------------|--------------|-----------------|
| | # Observations | Deficiencies | Compliance Rate |
| Timing between cleanup completion and clearance examination | 263 | 0 | 100% |
| NYCHA Personnel Certifications | 146 | 0 | 100% |
| Vendor Personnel Certifications | 117 | 1 | 99.15% |

| | | | |
|--------------------|-----|---|--------|
| Visual Inspection | 263 | 1 | 99.62% |
| Sample Collections | 262 | 0 | 100% |

NYCHA Personnel Observed

| Type of Personnel | Post RRP | Post Abatement |
|----------------------------|----------|----------------|
| Dust Wipe Technician | 89 | 0 |
| Certified Risk Assessor | 1 | 12 |
| Lead based Paint Inspector | 2 | 42 |

Vendor Personnel Observed

| Type of Personnel | Post RRP | Post Abatement |
|----------------------------|----------|----------------|
| Dust Wipe Technician | 48 | 0 |
| Certified Risk Assessor | 3 | 48 |
| Lead based Paint Inspector | 18 | 0 |

Notes:

- Of the 263 Dust Wipe Sample Collection jobs observed, 161 were for RRP clearance and 102 were for lead abatement clearance.
- Of the 161 RRP clearance observed, one (1) job had two deficiencies observed, one (1) for procedural violation and one (1) for Visual Inspection, reporting a total compliance rate of 99.38%.
- A data quality review revealed four (4) Clearance Examination Oversight Inspections with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

E. Visual Assessment Quality Assurance (QA)

| Inspection | # Observations | # Requiring LHC Review/Re-assessment |
|----------------------|----------------|--------------------------------------|
| Visual Assessment QA | 161 | 9 |

Note:

- The 9 jobs were submitted to LHC for further review to determine if a re-assessment is required.

Exhibit A: Escalation Memo – Lead Disclosure Documents (December 16, 2021-June 15, 2022)



Environmental Health & Safety Department

To: Brad Greenburg, Chief Compliance Officer
From: Patrick O'Hagan, VP Environmental Health and Safety Officer
Date: March 16, 2022
Re: Lead Disclosure Document Re-Inspection Failures (December 15, 2021 to February 2022)

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments from December 15, 2021 to February 28, 2022. If a development was missing some or all of the required documents, the development's documents were re-inspected after approximately 10 business days.

During the review period that covered December 15, 2021 – January 12, 2022, LOT confirmed that hardcopies of the following documents were 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

When developments fail the first inspection, LOTS provided copies of the LDD Quick Reference Guide and instructions on how to obtain assistance to retrieve the documents in Siebel.

On January 12, 2022 the Compliance Department issued updated instructions ("Guidance for Lead Disclosure Rule Documentation") for the lead disclosure documents that must be maintained at the developments. Following issuance of these updated instructions LOT confirmed that hardcopies of the following documents were present in a development's Lead Disclosure binder and placed in the following order:

- Development Disclosure Form
- Executive Summary Report
- Risk assessment Re-Evaluation Report
- List of Units with Individual Unit Disclosure Forms
- These documents must be placed within a Blue 3-Ring Binder

Additionally, EHS no longer provides failed developments with copies of the LDD QRG. Instead, they are provided with the "Guidance for Lead Disclosure Rule Documentation" issued by the Compliance Department.

The table below summarizes those developments that failed the first inspection during December 15, 2021 through February 28, 2022 and also failed the follow-up re-inspection.

| Development | First Inspection Date | Re-Inspection Date | Passed Re-Inspection |
|---------------|-----------------------|--------------------|----------------------|
| Drew Hamilton | 2/15/2022 | 3/8/2022 | No |



Environmental Health & Safety Department

| Development | First Inspection Date | Re-Inspection Date | Passed Re-Inspection |
|--|-----------------------|--------------------|----------------------|
| Bayview | 2/14/2022 | 3/8/2022 | No |
| Marble Hill | 1/12/2022 | 2/11/2022 | No |
| Beach 41 st Street/Ocean Bay Apartments | 1/28/2022 | 2/16/2022 | No |
| Pink | 1/31/2022 | 3/1/2022 | No |
| Manhattanville | 1/26/2022 | 3/1/2022 | No |
| Lower East Side | 2/2/2022 | 2/25/2022 | No |

In response to these findings of non-compliance, I am requesting that your department initiate appropriate corrective actions against the leadership teams of these locations.

Thank you in advance and please let me know if you have any questions.



Environmental Health & Safety Department

To: Brad Greenburg, Chief Compliance Officer
From: Patrick O'Hagan, Environmental Health & Safety Officer
Date: May 12, 2022
Re: Lead Disclosure Document Re-Inspection Failures (March 1, 2022, through April 15, 2022)

The EH&S Lead Oversight Team reviewed the Lead Disclosure Documents at various developments during March 1, 2022 through April 15, 2022. If a development was missing some or all of the required documents, the development's documents were 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 Binders:

- Development Disclosure Form
- Executive Summary Report
- Risk assessment Re-Evaluation Report
- List of Units with Individual Unit Disclosure Forms
- These documents must be placed within a Blue 3-Ring Binder

The table below summarizes those developments that failed the first inspection during March 1, 2022 through April 15, 2022 and also failed the follow-up re-inspection.

| Development | First Inspection Date | Re-Inspection Date | Passed Re-Inspection |
|----------------|-----------------------|----------------------|----------------------|
| Rangel | 3/28/2022 | 4/11/2022 | No |
| Morris | 3/3/2022 | 4/6/2022 | No |
| Manhattanville | 3/3/2022 | 3/22/2022 & 4/5/2022 | No |

The next table below summarizes those developments that failed the first inspection March 1, 2022-April 15, 2022 and also failed the follow up re-inspection. However, these locations subsequently passed on a third or fourth visit outside the reporting period.

| Development | First Inspection Date | Re-Inspection Date | Passed Re-Inspection |
|---------------|-----------------------|-----------------------|---|
| Howard | 3/1/2022 | 3/15/2022 & 3/29/2022 | Passed on a 4 th inspection on 4/13/2022 |
| Drew Hamilton | 3/8/2022 | 3/24/2022 | Passed on a 3 rd inspection on 4/7/2022 |



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|----------|----------|-----------|--|
| Edenwald | 3/7/2022 | 3/24/2022 | Passed on a 3 rd inspection on 4/7/2022 |
| Astoria | 3/9/2022 | 3/22/2022 | Passed on a 3 rd inspection on 4/6/2022 |

In response to these findings of non-compliance, I am requesting that your department initiate appropriate corrective actions against the leadership teams of these locations. Thank you in advance and please let me know if you have any questions.



Environmental Health & Safety Department

To: Brad Greenburg, Chief Compliance Officer
From: Patrick O'Hagan, VP Environmental Health and Safety Officer
Date: July 14, 2022
Re: Lead Disclosure Document Re-Inspection Failures (May 2022)

As part of the EH&S Lead Oversight Team (LOT) activities, the team is tasked with verifying the Lead Disclosure Documents at various developments during the month of May 2022. If a development was found to be non-compliant, the LOT provides the property management with the Compliance Department's "Guidance for Lead Disclosure Rule Documentation" to assist the location with correcting the noted deficiencies.

To ensure that the corrections were made to the Lead Disclosure Documents, the EHS LOT re-inspects the location after approximately 10 business days. The table below summarizes those developments that failed the first inspection and also the follow-up re-inspection during the month of May:

| Development | First Inspection Date | Re-Inspection Date | Passed Re-Inspection |
|-------------|-----------------------|--------------------|----------------------|
| Highbridge | 5/5/2022 | 5/20/2022 | No |
| King Towers | 4/5/2022 | 5/10/2022 | No |

In response to these findings of non-compliance, I am requesting that your department initiate appropriate corrective actions against the leadership teams of these locations.

Thank you in advance and please let me know if you have any questions.

Exhibit B: Renovation, Repair and Painting (RRP) Escalation Reports (December 16th, 2021 – June 15th, 2022)



Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
|--|---|---|--|
| 1. VENDOR or NYCHA PERSONNEL? NYCHA | 2. VENDOR NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) Pawel Grajewski 384335 George Cordero 78406 | 3. TYPE OF JOB Renovation, Repair and Painting (RRP) | 4. EHS INSPECTION WORK ORDER # 88158369 5. CM WORK ORDER # 83701238 |
| 6. ADMINISTERING DEPARTMENT Rapid Response (TEMPO) | 7. DEVELOPMENT: Wald | 8. OBSERVATION ADDRESS 40 Avenue D, Apt 8E | |
| 9. INCIDENT DESCRIPTION: EH&S Lead Oversight Team Specialist (LOTS) John Ospina observed the following on January 26th 2022 @ about 10:56 am: The Renovation, Repair and Painting Safety Sign (NYCHA 088.182) was not posted at the work area during an ongoing RRP job as per the Lead SP, page 53 (5)(a)(i). | | | |
| 10. 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 instructed the NYCHA staff that before any RRP job starts, the RRP safety sign must be posted at the work area. The RRP safety sign was posted by the NYCHA staff in a timely manner. LOTS contacted the Plasterers supervisor, Jerry Favorito (929-3849835) who was informed about the deficiency found during the inspection. | | | |



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| 11. PHOTOS: | |
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| 12. EHS PERSONNEL/EHS VENDOR | |
| NAME: John Ospina <small>Digitally signed by John Ospina Date: 2022.02.03 11:04:11 -05'00'</small> | DATE & TIME OF OBSERVATION: 01/26/2022 |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | |
| <p>LOTS strongly recommended to the NYCHA staff that during a RRP job category, adequate PPE must be worn at all the times. NYCHA staff was cooperative during the time of the inspection.</p> | |






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| EHU OVERSIGHT ESCALATION REPORT | | | |
|--|---|--|--|
| 1. VENDOR or NYCHA PERSONNEL? <p style="text-align: center;">NYCHA</p> | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL (If Vendor also indicate company name) RESAUL RADHAKRISHNA AND MOHAMED BOUZERIA | 3. TYPE OF JOB RRP | 4. EHS INSPECTION WORK# 87335506 5. CM WORK# 69723286 |
| 6. ADMINISTERING DEPARTMENT Department of Management & Planning | 7. DEVELOPMENT: LINCOLN HOUSES | 8. OBSERVATION ADDRESS 60 EAST 135TH STREET | |
| 9. DEFICIENCY: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR | | | |
| <p>10. INCIDENT DESCRIPTION:</p> <p>During an observation of RRP work at 60 East 135 street, apartment 6F, painters on this job failed to meet the following section of the HUD guideline; 40 CRF 745:</p> <p>Work Practice Standards (containing the work area) "Containment measures should be designed to prevent the release of lead-containing dust, which can be spread by workers' shoes or by airborne dust, taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed.</p> <p>On 12/23/2021 at 10:34am EH&S, Lead Oversight Team Specialist (LOTS) Akinola Idowu, LOTS observed the following:</p> <p>There was inadequate containment in the kitchen during work activities. Painters failed to seal off the kitchen entrance and window. In addition, some cabinets in the kitchen were not covered with plastic sheeting and fridge was not fully covered. The painters should have sealed off kitchen entrance and window with 6mil plastic sheeting and covered every item in the kitchen before they started scraping.</p> <p>Paint chips were seen on the kitchen cabinets, kitchen floor, and in apartment hallway that leads to kitchen.</p> | | | |
| <p>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?)</p> <p>Painters were instructed to stop the job and clean up the paint chips in the kitchen area; they complied with the directive. Painter Supervisor Jorge Mendez was informed about the violation of HUD's work practice standards by his painters and promised to address this gross violation accordingly.</p> | | | |



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| 12. PHOTOS: | | |
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| 13. EHS PERSONNEL/EHS VENDOR | | |
| NAME: AKINOLA IDOWU | DATE & TIME OF OBSERVATION: 12/23/2021 AT 10:34AM | |
| 14. ADDITIONAL INFORMATION (provide any other information that may be of importance) | | |
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| EHU OVERSIGHT ESCALATION REPORT | | | |
|--|---|---|--|
| 1. VENDOR or NYCHA PERSONNEL? NYCHA | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) Jomo Longdon - #78177 - Plasterer Paul Johnson - #79329 - Helper | 3. TYPE OF JOB RRP Plaster | 4. EHS INSPECTION WO# 88680420 5. CM WO# 88578021 |
| 6. ADMINISTERING DEPARTMENT Rapid Response (TEMPO) | 7. DEVELOPMENT: Webster Houses | 8. OBSERVATION ADDRESS 1260 Webster Avenue, #13C | |
| <p>9. INCIDENT DESCRIPTION:</p> <p>On 02/08/2022 at about 2:00 pm LOTS Chibuzor Nwobodo observed Plasterer Jomo Longdon performing RRP Plaster work with inadequate containment of the work area. He did not cover the entrance to the bathroom where he was working with plastic sheeting as required. He had completed demolition of bathroom wall #4 and was mixing plaster to start applying white coating at the time of inspection but some debris remained on the floor. He stated that he with his Helper had cleaned up their demolition debris and that whatever debris that was left was created by a maintenance worker that just came to disconnect the toilet.</p> <p>Plasterer Supervisor Jerry Favorito was contacted and he mentioned that plaster work will take too long to dry if the work area is completely covered. I informed him that there is debris on the floor and the prepared surface is bare which means that the work area still has a potential to create lead dust hazard to his staff and the residents. He advised the Plasterer and the Helper to comply with the directive.</p> <p>The failure to cover the entry to the bathroom with plastic sheeting is a violation of the Lead SP 050.201 page 84 (g) which states "Cover the work area entrance or vertical containment doorway with one layer of sheeting. Tape the sheeting to the top of the door frame or vertical containment high point and weigh down the bottom to create a seal. Create a door flap on the sheeting that allows access into the work area".</p> | | | |
| <p>10. 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?)</p> <p>LOTS Chibuzor Nwobodo instructed Plasterer Jomo Longdon and his Helper Paul Johnson to adequately contain their work area by covering the bathroom entrance with plastic sheeting. Plasterer Supervisor Jerry Favorito was also contacted and he asked them to comply with the directive. They complied with the directive while I was on site and before continuation of work.</p> | | | |



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| 11. PHOTOS | |
|  | |
| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | |
| NAME:  | DATE & TIME OF OBSERVATION: 02/08/2022 @ 2:00 pm |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | |
| | |



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| EHU OVERSIGHT ESCALATION REPORT | | | |
|--|--|--|--|
| 1. VENDOR or NYCHA PERSONNEL? Vendor | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) AWL Industries Byron Moreira Julio Cedeno | 3. TYPE OF JOB RRP Paint | 4. EHS INSPECTION WO# 90146446 5. CM WO# 85278687 |
| 6. ADMINISTERING DEPARTMENT TEMPO | 7. DEVELOPMENT: Bronx River Houses | 8. OBSERVATION ADDRESS 1595 East 174th Street, #09A Bronx, NY 10460 | |
| 9. INCIDENT DESCRIPTION: EHSS Lead Oversight Team Specialist Chibuzor Nwobodo observed the following on 03/18/2022 at about 2:20 pm: AWL Industries Painters Byron Moreira and Julio Cedeno were performing RRP Paint work with inadequate containment of the work area as per NYCHA Standard Procedure and EPA regulations. They did not close the windows or cover the entrance to the bedrooms where they were working with plastic sheeting or any impermeable material as required. They were performing the finishing part of the paint work when I arrived but some visible paint chips and dust were on the floor. When I inquired whether they had the windows closed and doors covered earlier, Byron Moreira told me that he didn't know that he had to close the windows and cover the door with plastic sheeting. He said that all that needs to be covered is the entrance to the apartment. At the end of the work day Byron Moreira and Julio Cedeno also refused to clean up their work area. First they argued that it was too late for them to clean up and later they claimed that work will continue on Monday 03/21/2022 and that is when they will conduct clean up activities. I informed them that NYCHA Standard Procedure requires them to clean up at the end of each day to contain the work area. As they refused to comply with my request I informed Painters Supervisor Miloslaw Gnidziejko and contacted LOTA Vincent Eweka. It was after LOTA contacted their office that they mobilized to conduct clean up. The following observations are in violation of NYCHA and EPA regulations: 1) Inadequate containment: SPO60201 Lead Safe Standard Procedure Section V11.1.10 - Site Preparation "Cover the work area entrance or vertical containment doorway with one layer of sheeting. Tape the sheeting to the top of the door frame or vertical containment high point and weigh down the bottom to create a seal. Create a door flap on the sheeting that allows access into the work area". 40 CFR 745.85.2 - Containing Work Area: Before beginning the renovation, the work area must be isolated so that no dust or debris leaves the work area while the renovation is being performed. In addition, the containment integrity must be maintained by ensuring that any plastic or other impermeable materials are not torn or displaced, and taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed. (1) Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area. 2) Refusal to clean up their work area: SPO60201 - Section V11.1.12, Cleaning Up a. Work That Exceeds Eight Hours: If work is not completed at the end of an eight-hour shift, at the end of work on each day: (1) The work area must be contained to prevent the release of leaded dust and debris into other areas and other safety, health, or environmental hazards; and (2) The work area must be cleaned within at least 10 feet of the containment area to remove any visible dust or debris, and so other areas of the apartment or common area are accessible. 3) Wrong warning sign was posted: SPO60201 Lead Safe Standard Procedure Section V11.1.10.a(1) - Signage Outside the Work Area: a) "Certified renovators post NYCHA Form 088.182, Renovation, Repair, and Painting Safety Sign, before work begins. NYCHA Form 088.182, Lead Safety Sign was not posted at the entrance to the work area. However, a sign was posted at the entrance but not the right sign. 4) Failure to have cleaning verification card on them: Section V11.12. b. Cleaning Verification 2) The certified renovator confirms they have the proper equipment to perform the cleaning verification. The required equipment is: a) The EPA Post-Renovation Cleaning Verification Card; | | | |
| 10. 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?) Painters were informed that failing or neglecting to contain the work area especially in a child occupied unit when performing RRP work is a serious violation of EPA regulations and NYCHA Lead Safe Standard Procedure. It was not necessary to ask them to cover the door at that point because work was at its completion and almost at the point to start taking down other containments. Regarding clean up LOTA Vincent Eweka contacted AWL's office and instructed them to go back and clean up their work area. He also requested that I stay around to observe them conduct proper clean up. Painters Supervisor, Miloslaw Gnidziejko made them comply while I was still on site. | | | |



Environmental Health & Safety Department

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| 11. PHOTOS: | | |
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| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | | |
| NAME:  | DATE & TIME OF OBSERVATION: 03/18/2022 @ 2:20 pm. | |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | | |
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Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? NYCHA | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) Terrell Skinner - Plasterer NYCHA ID #78422 | 3. TYPE OF JOB RRP Plaster | 4. EHS INSPECTION WO# 91849970 5. CM WO# 87996343 |
| 6. ADMINISTERING DEPARTMENT Brooklyn Property Management | 7. DEVELOPMENT: Red Hook East Houses | 8. OBSERVATION ADDRESS 129 Lorraine Avenue Street, #1A Brooklyn, NY 11231 | |
| 9. INCIDENT DESCRIPTION: During an observation of RRP Plaster Red Hook Houses, there was a violation of NYCHA Lead Safe Standard Procedure and EPA's Lead Safe Work Practices Requirement: SP050201-Lead Safe Standard Procedure Section 7.1.10 - Site Preparation "Cover the work area entrance or vertical containment doorway with one layer of sheeting. Tape the sheeting to the top of the door frame or vertical containment high point and weigh down the bottom to create a seal. Create a door flap on the sheeting that allows access into the work area". 40 CFR 745.85.2 - Containing Work Area Before beginning the renovation, the work area must be isolated so that no dust or debris leaves the work area while the renovation is being performed. In addition, the containment integrity must be maintained by ensuring that any plastic or other impermeable materials are not torn or displaced, and taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed. c) Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area. EHS Lead Oversight Team Specialists (LOTS) Chibuzor Nwobodo and Samuel Awelewa observed the following on 05/17/2022 at about 11:15 am: Observed and flagged Plasterer Terrell Skinner for not posting warning sign-age outside the work area when performing RRP plaster work; also put in place inadequate containment of his work area as per the NYCHA Standard Procedure and EPA regulation cited above. He did not close or cover the window and the entrance to the bathroom where he was working with plastic sheeting or any impermeable material as required. He had completed demolition of bathroom ceiling and wall #4 including bathroom chair-rail and was plastering the prepared surface at the time of inspection. There were some paint chips, debris and dust accumulated on the floor of the work area. He said that the work was not RRP because the demolished surface was less than two square feet. He did not comply or show any sign that he intends to comply with our directive for him to contain the work area while we were on site. (3) SP050201-Lead Safe Standard Procedure Section V11.1.10.a(1) - Sign-age - Outside the Work Area: a) "Certified renovators post NYCHA Form 088.182, Renovation, Repair, and Painting Safety Sign, before work begins. NYCHA Form 088.182, Lead Safety Sign was not posted at the entrance to the work area. The deficiency was corrected as a sign was posted while we were on site. | | | |
| 10. 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, Chibuzor Nwobodo asked the Plasterer, Terrell Skinner to post Paint Safety Sign and to adequately contain the work area by closing the window and covering the bathroom door with 6mil plastic sheeting. He complied with posting the sign but he was not showing any inclination that he wanted to cover the door and the window. Instead he asked us to instruct his Helper to do it when she comes back from the shop. She didn't come back yet by the the time we left; suddenly because of unsafe condition as gun shots were reported within the vicinity. LOT Field Supervisor Samuel Awelewa contacted Plasterer Supervisor Frank and notified him about our observations. | | | |



Environmental Health & Safety Department

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| 11. PHOTOS: | | |
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| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | | |
| NAME:  | DATE & TIME OF OBSERVATION: 05/17/2022 @ 11:15 AM. | |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | | |
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Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? NYCHA | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL (if Vendor also indicate company name) Charles Dennis NYCHA ID# 384803 | 3. TYPE OF JOB RRP Plaster | 4. EHS INSPECTION WO# 91875813 5. CM WO# 89839740 |
| 6. ADMINISTERING DEPARTMENT Bronx Property Management | 7. DEVELOPMENT: Mill Brook Houses | 8. OBSERVATION ADDRESS 180 Brook Avenue, #01C Bronx, NY 10454 | |
| <p>9. INCIDENT DESCRIPTION:</p> <p>During an observation of RRP Plaster job at Mill Brook there was a violation of NYCHA Lead Safe Standard Procedure and EPA's Lead Safe Work Practices Requirement:</p> <p>SP050201-Lead Safe Standard Procedure Section 7.1.10 - Site Preparation "Cover the work area entrance or vertical containment doorway with one layer of sheeting. Tape the sheeting to the top of the door frame or vertical containment high point and weigh down the bottom to create a seal. Create a door flap on the sheeting that allows access into the work area".</p> <p>40 CFR 745.85.2 - Containing Work Area Before beginning the renovation, the work area must be isolated so that no dust or debris leaves the work area while the renovation is being performed. In addition, the containment integrity must be maintained by ensuring that any plastic or other impermeable materials are not torn or displaced, and taking any other steps necessary to ensure that no dust or debris leaves the work area while the renovation is being performed.</p> <p>c) Close windows and doors in the work area. Doors must be covered with plastic sheeting or other impermeable material. Doors used as an entrance to the work area must be covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area.</p> <p>EH&S Lead Oversight Team Specialist (LOTS) Chibuzor Nwobodo observed the following on 05/18/2022 at about 11:20 am:</p> <p>Observed and flagged Plasterer Charles Dennis for performing RRP Plaster work with inadequate containment of his work area as per the NYCHA Standard Procedure and EPA regulation cited above. He did not close the door or cover the entrance to the hallway closets where he was working with plastic sheeting or any impermeable material as required. He had completed demolition of surfaces, did partial clean up and was plastering walls at the time of inspection but some debris were on the floor. He told me that the job started the day before, clean up of big demolition debris was done and he thought that containment was no longer necessary. It was pointed out to him that visible dust, paint chips and debris were still on the floor and they still pose potential for Lead dust hazard to him and or the resident.</p> <p>Plasterer complied with my directive to adequately contain the work area, he created barriers between the work area and the resident by covering the hallway closet and part of the hallway while I was on site.</p> | | | |
| <p>10. 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?)</p> <p>LOTS, Chibuzor Nwobodo asked the Plasterer, Charles Dennis to adequately contain his work area. Plasterer Supervisor Mitra Gopeesingh was also contacted and he asked the Plasterer to comply with the directive. He complied by properly covering the entrance while I was on site and before continuation of work.</p> | | | |



Environmental Health & Safety Department

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| 11. PHOTOS: | | |
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| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | | |
| NAME:  | DATE & TIME OF OBSERVATION: 05/18/2022 @ 11:20 am. | |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | | |
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Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? NYCHA | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL <small>(if Vendor also indicate company name)</small> Atilio Cruz ID # 78248 Christopher Rodriguez ID # 55690 | 3. TYPE OF JOB RRP | 4. EHS INSPECTION WO# 92490852 5. CM WO# 91687291 |
| 6. ADMINISTERING DEPARTMENT Manhattan Property Management | 7. DEVELOPMENT: GRANT | 8. OBSERVATION ADDRESS 430 West 125th Street, Apt 19D Manhattan, NY 10027 | |
| <p>9. INCIDENT DESCRIPTION: Lead Oversight Team Specialist (LOTS) John Ospina observed the following deficiencies on June 7th 2022 @ about 10:56 AM:</p> <ol style="list-style-type: none"> 1. Renovation, Repair and Painting Safety Sign (NYCHA 088.182) was not posted at the work area as per NYCHA SP 050.201 page 53 (5)(a)(i) which states "at each entrance to a work area before work begins" 2. EPA cleaning verification card was not available onsite as per NYCHA SP 050.201 page 90 (2)(a) which states "The Certified renovator confirms they have the proper equipment to perform the cleaning verification. The required equipment is: The EPA Post-Renovation Cleaning Verification Card" 3. No barrier between the working area (Bathroom) and the rest of the apartment as per NYCHA SP 050.201 page 84 (g) which states "Cover the work area entrance or vertical containment doorway with one layer of sheeting. Tape the sheeting to the top of the door frame or vertical containment high point and weigh down the bottom to create a seal. Create a door flap on the sheeting that allows access into the work area." 4. The plastic covering the apartment hallway floor was not taped. The plastic was loose and become a potential tripping hazard. As per NYCHA SP 050.201 page 84 (b)(1)(e) which states "Cover the floor of the work area with one layer of six-mil disposable polyethylene sheeting and tape the sheeting down to prevent movement" 5. The RRP certificate for NYCHA plasterer Atilio Cruz was not available on-site. As per NYCHA SP 050.201 I.2(a) which states "Certified Renovator to perform RRP work that might disturb lead-based paint, a NYCHA employee or vendor employee must have current RRP certification." | | | |
| <p>10. CORRECTIVE ACTION TAKEN: <small>(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?)</small></p> <p>LOTS instructed the NYCHA staff that before any RRP job starts, the RRP safety sign must be posted at the work area; the EPA cleaning verification card must be available on-site; The RRP certificate must be carried and available for review at all the times.</p> <p>During the inspection; The RRP safety sign was posted; The EPA cleaning verification card was obtained; The work area was cleaned and verification of cleaning was completed. LOTS contacted the Plasterers' supervisor, Keith Stewart (929-2373291); Who was informed about the deficiencies found during the time of inspection.</p> | | | |



Environmental Health & Safety Department




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| 11. PHOTOS: | |
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| <i>Missing Signage</i> | <i>Improper Containment</i> |
| 12. EHS PERSONNEL/EHS VENDOR | |
| John Ospina | |
| NAME: | DATE & TIME OF OBSERVATION: |
| John Ospina | 06/07/2022 10:56 AM |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | |
| <p>The NYCHA staff was cooperative at the time of the inspection. The plasterer's supervisor was notified that Atilio Cruz will be not allow to conduct RRP jobs category until the RRP certificate becomes available.</p> <p>It should be noted that LOT was able to verify on 6/15/2022 that Atilio Cruz completed RRP training on 12/4/2020 (expiration 12/4/2025) via NYCHA University.</p> | |

Exhibit C: Lead Abatement Escalation Reports (December 16th, 2021 – June 15th, 2022)

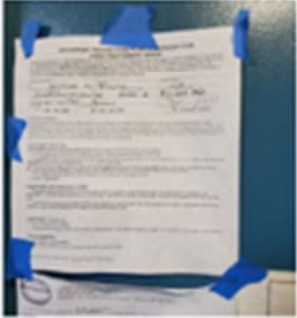


Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? Vendor | 2. VENDOR NAME(S) OF NYCHA PERSONNEL (If Vendor also indicate company name) Gregory Schadt Abatement Supervisor Joseph Environmental | 3. TYPE OF JOB Abatement | 4. EHS INSPECTION WO# 88116827 |
| | | | 5. CM WO# 87806156 |
| 6. ADMINISTERING DEPARTMENT Lead Hazard Control | 7. DEVELOPMENT: South Jamaica I | 8. OBSERVATION ADDRESS 107-40 159th Street, #01B Jamaica, NY 11433 | |
| <p>9. INCIDENT DESCRIPTION:</p> <p>Lead Oversight Team Specialist (LOTS), Chibuzor Nwobodo observed the following deficiencies on 01/24/2022 at approximately 11:25 am:</p> <p>1) Occupant Protection Plan (OPP) was not properly completed as the occupant location that was checked did not match unit status as vacant.</p> <p>The observed deficiencies were brought to the attention of Abatement Supervisor, Gregory Schadt and he made corrections while I was still on site.</p> <p>SP 050.201-Lead Safe Standard Procedure Section V11.G (d) & (e)</p> <p>e). "Occupant Protection Plan A certified abatement supervisor develops a written occupant protection plan to prevent exposure to any lead-based paint hazards. If a vendor performs the abatement, the vendor develops the plan. See Appendix F, Occupant Protection Plan Template.</p> <p>An occupant protection plan must: 1) Be unique to each apartment".</p> | | | |
| <p>10. 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?)</p> <p>NYCHA Lead Abatement Project Inspector Francois Vitalis was present and the Abatement Supervisor was asked to fix the deficiency. Corrections were made while I was still on site.</p> | | | |



Environmental Health & Safety Department

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| 11. PHOTOS: | |
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| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | |
| NAME: Chibuzor Nwobodo | DATE & TIME OF OBSERVATION: 01/24/2022 @ 11:25 AM |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | |
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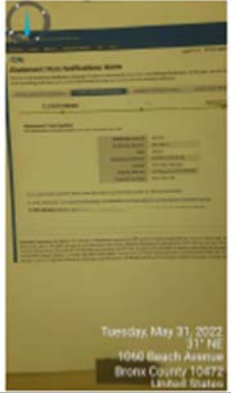
Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? Vendor | 2. VENDOR/NAME(S) OF NYCHA PERSONNEL <small>(if Vendor also indicate company name)</small> Orlando Torres (Empire Control Abatement) | 3. TYPE OF JOB ABATEMENT | 4. EHS INSPECTION WO# 92156952 5. CM WO# 91898469 |
| 6. ADMINSTERING DEPARTMENT LHC | 7. DEVELOPMENT: Justice Sonia Sotomayor Houses | 8. OBSERVATION ADDRESS 1060 Beach Ave Apt 3H | |
| 9. INCIDENT DESCRIPTION: <p>On 5/31/22 Compliance Assurance Vendor Jennifer Mith Jean observed a violation of work practice standard for conducting lead-based paint activities. The EPA Notification was not posted as required in by NYCHA's Lead SP 050.021which states:</p> <p>"A copy of the notice of commencement of work must be posted between 24 and 96 hours before work begins. It must be posted at the entrance to the building and at the entrance of the specific apartment where work will take place for the duration of the work."</p> <p>The vendor posted a screen shot of the application, which does not contain the required information such as the name and certification number for the abatement supervisor.</p> | | | |
| 10. CORRECTIVE ACTION TAKEN: <small>(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?)</small> <p>After reporting the deficiency to the supervisor, we went to the company vehicle to see if any of the documentation was left behind so that it could be added to the rest of the EPA notification that was posted. There were no additional pages or copies of the EPA notice as what he had was all that was given to him. This violation was not corrected while on-site.</p> <p>LOT was able to verify that a NOC was created and filed with LHC prior to the work.</p> | | | |



Environmental Health & Safety Department

11. PHOTOS:



SEPA

REGISTRATION INFORMATION

Agency representative of the facility has been authorized to complete a permit for water quality. The permit is intended to regulate the discharge of pollutants from the facility into the receiving waters.

A. Facility Information

Facility Name: (Facility Name) (City) (State) (Zip)

B. Discharge Information

Discharge Point: (City) (State) (Zip)

C. Discharge Description

Discharge Description:

D. Permit Information

Permit Number:

E. Agency Information

Agency Name: (City) (State) (Zip)

F. Facility Contact Information

Facility Contact Name: (City) (State) (Zip)

G. Agency Contact Information

Agency Contact Name: (City) (State) (Zip)

This collection of information is prepared by the Permittee and is subject to the provisions of the Freedom of Information Act (5 U.S.C. 552) and any other laws that may apply. It is not to be disseminated outside the agency. The collection of information is not to be used for any other purpose. The collection of information is not to be used for any other purpose. The collection of information is not to be used for any other purpose.

Privacy Act Statement: This document is prepared pursuant to the Privacy Act of 1974 (5 U.S.C. 552a). The information collected on this form will be used to determine the applicant's eligibility for a permit. It is not to be disseminated outside the agency. The collection of information is not to be used for any other purpose. The collection of information is not to be used for any other purpose.

NOC Page 1 NOC Page 2

12. EHS PERSONNEL/EHS VENDOR UNYSE (Jennifer Mith Jean)

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| NAME: | DATE & TIME OF OBSERVATION: |
| | <h1>05/31/22</h1> |

13. ADDITIONAL INFORMATION (provide any other information that may be of importance)

Exhibit D: Dust Wipe Clearance Escalation Reports (December 16th, 2021 – June 15th, 2022)




Environmental Health & Safety Department

| EHU OVERSIGHT ESCALATION REPORT | | | |
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| 1. VENDOR or NYCHA PERSONNEL? VENDOR | 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# 87953847 |
| | | | 5. CM WO# 77403784 |
| 6. ADMINISTERING DEPARTMENT Lead Hazard Control | 7. DEVELOPMENT: Mitchel Houses | 8. OBSERVATION ADDRESS 175 Alexander Avenue, 18C Bronx, NY 10454 | |
| <p>9. INCIDENT DESCRIPTION:</p> <p>On 1/14/2022 LOTS Chibuzor Nwobodo observed Yoel Henriquez, dust-wipe technician for Genesis, arrive to perform a dust-wipe clearance sample at Mitchel Houses with an expired Lead Inspector (LII-21-4499) certification, expired on 12/16/2021.</p> <p>Upon inquiry about the status of his Lead Based Paint Inspector certificate, Mr. Yoel Henriquez stated that he knew that his certificate had expired. LOTS informed him that HUD guidelines requires him to have a current certificate to enable him conduct the dust-wipe sampling. He stopped all further setup of sampling templates and left.</p> <p>Painter Supervisor Robert Wacniks arrived to the site and was made aware of the situation.</p> | | | |
| <p>10. 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?)</p> <p>Painter Supervisor Robert Wacniks arrived to the site and was informed that the dust-wipe technician had an expired certification and therefore could not proceed with the clearance. He told the resident that he will reschedule the dust-wipe clearance for another day.</p> <p>On 1/18/2022 LOTA contacted Genesis Environmental and obtained Yoel Henriquez's Dust Sampling Technician certification which expires on 01/07/2024. This certificate can only be used for RRP clearance work and not abatement clearance work. Please note that Yoel did not have this certificate with him at the time of the LOT inspection.</p> <p>LOTA informed LHC that they must ensure that Genesis does not assign Yoel to perform sampling for abatement jobs which can only be done by a certified lead inspector or risk assessor, until he renews and provides a valid lead inspector or risk assessor license.</p> <p>LOTA also informed LHC to direct Genesis that all lead personnel must have valid certifications on their person when performing jobs on NYCHA properties.</p> | | | |



Environmental Health & Safety Department

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| 11. PHOTOS: | |
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| 12. EHS PERSONNEL/EHS VENDOR Chibuzor Nwobodo | |
| NAME: Chibuzor Nwobodo | DATE & TIME OF OBSERVATION: January 14, 2022 @ 01:30 PM |
| 13. ADDITIONAL INFORMATION (provide any other information that may be of importance) | |
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