February 11, 2016

MEMORANDUM NO:
[2016-NY-1801]

Memorandum

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

FROM: 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.

Office of Audit, Region 2
26 Federal Plaza, Room 3430, New York, NY 10278
Phone (212) 264-4174, Fax (212) 264-1400
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 (\(\mu g/ft^2\)) 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 \(\mu g/ft^2\). 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

Appendix A

AUDITEE COMMENTS AND OIG’S EVALUATION

Ref to OIG Evaluation

Auditee Comments

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.
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.

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.

**Comment 3**

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

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.

**Comment 4**

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

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 11th.
## AUDITEE COMMENTS AND OIG’S EVALUATION

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<thead>
<tr>
<th>Ref to OIG Evaluation</th>
<th>Auditee Comments</th>
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**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.

Notwithstanding the above and without waiving the City’s right to rely upon its position as stated in its initial January 8th 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.

**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.

**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.

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AUDITEE COMMENTS AND OIG’S EVALUATION

Ref to OIG Evaluation

Auditee Comments

Thank you for your courtesies.

Very truly yours,
JEREMY FARRELL
CORPORATION COUNSEL

/j/ James M. LaBlanca
Asst. Corporation Counsel

Cc: Karen A. Campbell Lawrence
    Mostafa Elhelo
    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

[Image of certificate with redacted portions]

[Table of results]

(ND = Not Detected; N.A. = Not Applicable; RL = Reporting Limit. Analytical Reporting Limit is 10 µg/ft². For blank values assume 0.001 µg/ft². Figures for method and technique are not applicable unless otherwise stated. ETR 14 10 Regulatory Limit: 40 µg/ft² (Surface Coatings: Wood, Woodwork). 0.5 mg/ft² (Window Sill/Frame). 400 µg/ft² (Window Sill/Frame: Concrete Surface). The laboratory operates in accordance with ISO 17025 guidelines and utilizes licensed operators of accreditation under AATCC and NY State DOD-ELAP programs. These results are submitted pursuant to AATCC certification and conditions of sale. Including the company's standard warranty and limitation of liability provisions. Analytical results refer 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.)

[Signature]

Date: [Redacted]
Certificate of Analysis: Lead in Dust Wipe by NIOSH Method 7082

Client: Jones City Division of Community Development
30 Montgomery St., Room 601
Jersey City, NJ 07302

AEC Project #: 130916

Sampling Date: 10/17/2012
Date Analyzed: 10/23/2012
Date Reported: 10/24/2012

Project Location:

Laboratory Information:

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*(N) = Not Detected; NA = Not Available; RL = Reporting Limit, Analytical Reporting Limit is 10 ppm sample. *For two values assume (2) significant figures. This method and laboratory QC is acceptable unless otherwise stated. EPA AHD Regulatory Levels: 40 ppm

This laboratory operates in accordance with ISO 17025 guidelines and holds limited scope of accreditation under the NYS and NY State OCE-ELA programs. These results are submitted pursuant to AEC LLC current terms and conditions of sale, including the company’s standard warranty and limitations of liability provisions. Analytical results relate to the samples examined by the lab. AEC LLC shall assume no liability or responsibility for the manner in which the results are used or interpreted.
Appendix C

STATEMENTS ON THE EXISTENCE OF LEAD HAZARDS

HOMEOWNER REBATE PROGRAM

CASE NO.: Hope-801

HOUSING, ECONOMIC DEVELOPMENT AND COMMERCE
Division of Community Development
Jeremiah T. Hutt
City of Jersey City

ADDRESS:

TELEPHONE: 10/17/12

DATE:

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 06/14/12

Inspection Date

II. UPON COMPLETION OF REHAB:

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

and clearance:

Inspector 06/14/12

Inspection Date

HRP P3
REV. 10/12/12
HOMEOWNER REBATE PROGRAM

CASE NO.: 11-0998-2011
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 ( ) meet the Section 8 Housing Quality Standards.
      
      Inspector: [Redacted]
      Inspection Date: 12/21/2011

   B. Lead Based Paint Hazards Do ( ) Do Not ( ) exist based on the initial Risk Assessment inspection.
      
      Inspector: [Redacted]
      Inspection Date: 2/3/12

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.
      
      Inspector: [Redacted]
      Inspection Date: 4/30/2012

   B. Lead Based Paint Hazards Do ( ) Do Not ( ) exist based on final inspection
      
      Inspector: [Redacted]
      Inspection Date: 4/30/12

HHP-3 revised 1/10
HOMEOWNER REBATE PROGRAM

CASE NO.: HOPP-2011

HOMEOWNER: [Blacked Out]
ADDRESS: [Blacked Out]
TELEPHONE: [Blacked Out]
DATE: [Covered]

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: [Blacked Out]  
1/22/12 Inspection Date

II. UPON COMPLETION OF REHAB:

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

Inspector: [Blacked Out]  
10/9/12 Inspection Date
Appendix D

INCOMPLETE INITIAL LEAD RISK ASSESSMENT REPORT

1ST Floor and 2ND Floor is wood paneling because no lead was found.

- Note: No lead found on 1st and 2nd floor
- 2nd floor bedroom 1 replace door 6.1 UG
- 2nd floor bedroom 2 replace door 5.8 UG
- 2nd 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
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<th>Structure</th>
<th>Component Coating/finish or open etc.</th>
<th>Paint Condition</th>
<th>Impact Fair or Poor</th>
<th>Substrate</th>
<th>XRF RESULT mg/cm²</th>
<th>Method of L.H.R</th>
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Note: No lead found on 1st and 2nd floor.
- 2nd floor bedroom 1 replace door 6.1 UG
- 2nd floor bedroom 2 replace door 5.8 UG
- 2nd floor bedroom 3 replace door 6.6 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
## Appendix E

### LAB CERTIFICATES OF LEAD DUST ANALYSIS

![Certificate of Analysis: Lead in Dust Wipe by NIOSH Method 7082](image)

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*NOT Method Detection: ND. ND Available. RL Reporting Limit: Analytical Reporting Limit is 50 ug/ft². For two or more analyses (2) significant figures. The method and batch QC is acceptable unless otherwise stated. EPA HUD Regulatory Limit: 40 ug/ft² (Fluorescent and summit). 250 ug/ft² (Window Sills/Bays), 400 ug/ft² (Other). Revised December 2012. The laboratory operates in accord with ISO 17025 guidelines and holds periodic audits. Work is certified through the New York State DOL EPD program. 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 LLC assumes no liability or responsibility for the interpretation in which the results are used or interpreted.*
### Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7602

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

**AAT Project:** 1603X4  
**Sampling Date:** 160210  
**Date Received:** 160210  
**Date Analyzed:** 160210  
**Analyst:**  

**Project Location:**

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<th>Hg Value (µg/ft²)</th>
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<td>JER-1</td>
<td>1st F, L, Office WS</td>
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<td>165.2204</td>
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<td>165.2207</td>
<td>JER-5</td>
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<tr>
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</tbody>
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*Analyst Signature*

---

**AAT Project Terms & Conditions:**  
This Certificate of Analysis is valid for 12 months from the issue date. The sample results reported on this Certificate of Analysis are subject to the terms and conditions outlined in the AAT Project Terms & Conditions. Any disputes are subject to the laws of New Jersey. **Privacy Policy:** The information herein is confidential and is intended for the use of the party to whom it is addressed. No part of this Certificate of Analysis may be reproduced or distributed without the prior written consent of AAT LLC. **Disclaimer:** The information contained herein is deemed reliable but is not guaranteed. The use of this Certificate of Analysis is subject to the terms and conditions outlined in the AAT Project Terms & Conditions. **Confidentiality:** The information contained herein is confidential and is intended for the use of the party to whom it is addressed. **Restrictions:** The information contained herein may not be reproduced or distributed without the prior written consent of AAT LLC.
Certificate of Analysis: Lead in Dust Wipes by NIOSH Method 7082

Client:  Jersey City Division of Community Development
Address:  30 Harsimus Cove St, Room 8N
Mail:  Jersey City, NJ 07306

Lab Code:  1547-1901

<table>
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<td>1ST FL. KITCHEN</td>
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<td>&lt;45 ug/sq ft</td>
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<td>&lt;45 ug/sq ft</td>
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Analysis signature:

[Signature]

[Additional remark]  All lead samples were tested at the Laboratory of Analytical Services Inc. (LASI). The results are in ug/sq ft. The analysis was performed in accordance with NIOSH Method 7082. The lead content in the samples was determined using火焰原子吸收光谱法。
# Certificate of Analysis: Lead in Dust Wipe by NIOSH Method 7082

**Client:** Jersey City Division of Community Development  
20 Broad Street, 4th Floor, Room 424  
Jersey City, NJ 07302  
**Project #:** 120075  
**sampling date:** 7/1/2012  
**Date Received:** 7/12/2012  
**Date Analyzed:** 7/1/2012  
**Date Reported:** 7/11/2012

**Project Location:** [Redacted]

**Comments:** [Updated if necessary]

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<th>Area (sq ft)</th>
<th>Results Lead (µg/m²)</th>
<th>Analyst</th>
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<td>DIN RM V5S</td>
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*ND=Not Determined, N/A=Not Available, FL Reporting Limit, Analytical Reporting Limit is 10 µg/m².* For true values assume 0.0 µg/m². For method and blank QC, is acceptable unless otherwise stated. EPA-MEQ Regulatory Limits: 10 µg/m² (Hospitals, Carpets/Interiors), 50 µg/m² (Windows, Stairs, Door/Concrete Surfaces). The laboratory remains in compliance with OSHA 29CFR1926 guidelines and holds current status of accreditation with A2LA and NVLAP, C-010415, COH-ELSP 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 refer to the samples as received by the lab. AAT will assume no liability or responsibility for any manner in which the results are used or interpreted.

**Date Printed:** 7/11/2012 17:54  
**AAT Project #:** 120075  
**Page:** 1 of 1
## Certificate of Analysis: Lead In Dust Wipe by NIOSH Method 7082

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[Note: The table above contains the analysis results for various samples, with the results showing compliance with NIOSH Method 7082.]

---

[<footer>Accurate, LLC, certificate number 000100, 11/19/2012</footer>]

[Signature]

Date 1st Requested: 05/06/12

AAT Project #: 123498

Page 1 of 1

[Revision History: 05/06/2012 14:51]
## Certificate of Analysis: Lead in Dust Wipe by NIOSH Method 7082

### Client:
Jersey City Division of Community Development

### AAT Project:
Jersey City H. 7082

### Date of Analysis:
12/17/16

### Client Project:

### Project Location:

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### Analyst Signature:

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*Note: The results presented are in compliance with the applicable Federal and New Jersey regulations.*
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# Certificate of Analysis: Lead in Dust Wipe by NIOSH Method 7082

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<th>Width (inches)</th>
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(Alt text: Detected, Akin ion available, RI. Limiting Lead: 25, 20 ug/ft². Results reported in accordance with the NIOSH guidelines and by the U.S. Environmental Protection Agency. Lead levels were measured using the EPA's procedure for analysis. The laboratory complies with 10 CFR 261 and maintains quality control for all analytes. This report is intended for use only for the purpose intended and does not imply acceptance or approval of any results. The laboratory will not assume any liability or responsibility for the manner in which the results are used or interpreted.)

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Date Printed: 02/11/2012
AAT Project #: 110863
Page 1 of 1