



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-1000

This Worksheet is designed to be used by those "Partners" (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

## Housing Requirements

Many Housing Division programs have additional requirements beyond those listed at 50.4. Some of these relate to compliance with 50.3(i) and others relate to site nuisances and hazards.

Requirements for evaluating additional housing requirements vary by program. Refer to the appropriate guidance for your program area (i.e. the Multifamily Accelerated Processing (MAP) guide, Chapter 7 of the Healthcare Mortgage Insurance Handbook, etc.) for specific requirements.

### Lead-based paint

Lead-based paint may be present in buildings built prior to 1978. Guidance materials related to lead-based paint, including a helpful online Lead Rule Compliance Advisor, may found by following on HUD's website. Buildings constructed in 1978 or later do not require lead-based paint testing. Refer to specific program guidance for additional exemptions and requirements.

#### **Was a lead-based paint inspection or survey performed by the appropriate certified lead professional?**

- Yes. → *Continue to next question.*
- No, because the project was previously deemed to be lead free. → *Provide all lead free certificates.*
- No, because the project does not involve any buildings constructed prior to 1978. → *Provide documentation of construction date(s).*
- No, because program guidance does not require testing for this type of project. (For example: HUD's lead-based paint requirements at 24 CFR Part 35 do not apply to housing designated exclusively for the elderly or persons with disabilities, unless a child of less than 6 years of age resides or is expected to reside in such housing. In addition, the requirements do not apply to 0-bedroom dwelling units.) → *Explain determination below.*

#### **Was lead-based paint identified on site?**

- Yes. → *Refer to program guidance for remediation requirements. Describe the testing procedure and findings in the textbox below and any necessary mitigation measures in the Mitigation textbox at the bottom of this screen. Upload all documentation below.*
- No. → *Provide all testing documents demonstrating that no lead-based paint was found.*

#### **Describe how exemption or compliance was met and provide any relevant documents such as reports, surveys, and letters.**

The facility was constructed in 1970 (Section 3-13) and 1972 (Section 3-14), prior to the 1978 ban on lead-based paint (LBP). Mr. Donald Suleski, a State of Tennessee licensed Lead-Based Paint Inspector (license #TNLBP2016-2997-5905I) with Get The Lead Out, LLC, conducted a lead-based paint inspection at the subject property from February 19 through March 1, 2018 on behalf of D3G. Select units were tested in

accordance with the United States Housing and Urban Development (HUD) protocols, as outlined in the *Chapter 7, Lead-Based Paint Inspection 2012 Revisions*. In accordance with HUD Underwriting Protocols and Table 7.3, twenty-four (24) units of the seventy-four (74) units in Section 3-13 and twenty-eight (28) units of the 306 units in Section 3-14 required sampling as well as common areas including the office, community building and Boys and Girls Club and exterior areas. The lead paint inspection was completed utilizing an X-ray fluorescence (XRF) lead paint analyzer, which quickly, accurately, and non-destructively measures the concentration of lead-based paint on surfaces. Sampled surfaces consisted of walls, doors and associated framework, windows and associated framework, ceilings, baseboards, stairwell components, cabinets, miscellaneous components and exterior components. The XRF readings were compared to the EPA and United States Department of Housing and Urban Development lead in paint standard of 1.0 mg/cm<sup>2</sup>. The results of this inspection indicate that none of the sampled components contained lead-based paint.

The Lead-Based Paint Inspection Report will be located in Appendix K of the Phase I ESA, which is included under separate cover.

### Radon

Many Housing Programs require radon testing and mitigation. Radon is a colorless, odorless gas that can enter the air inside of buildings. Refer to specific program guidance for testing and mitigation requirements.

#### **Was radon testing performed following the appropriate and latest ANSI-AARST standard?**

- Yes → *Continue to next question.*
- No, because program guidance does not require testing for this type of project. → *Note that radon testing is encouraged for all HUD projects, even where it is not required. Explain why radon testing was not completed below.*

#### **Did testing identify one or more units with radon levels above the EPA action level for mitigation?**

- Yes → *Refer to program guidance for remediation requirements. Describe the testing procedure, findings, and mitigation measures below and provide all documentation.*
- No → *Provide all testing documents demonstrating that radon was not found above EPA action levels for mitigation.*

#### **Describe how exemption or compliance was met and provide any relevant documents such as reports, surveys, and letters.**

The property does not contain subgrade living areas, which reduces the potential for radon gas. Ms. Kathryn Hubicki, an AARST/NRPP certified radon technician (certification #108842RT) with Get the Lead out, LLC, conducted short-term radon gas testing at the subject property on behalf of D3G. Radon gas sampling was conducted in representative apartment units/areas at the subject property from February 27 – March 2, 2018. In accordance with HUD guidelines, testing was conducted in general accordance with AARST MAMF-2017, Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (AARST MAMF-2017) in at least 25% of the ground floor units in each building. In addition, at least 10% of the units on each of the upper level floors in each building were tested as well as ground floor common areas. At least one (1) liquid scintillation testing device was placed in each of the tested units for an undisturbed testing period of 48 to 72 hours. QA/QC samples (field blanks and duplicates) were also submitted in accordance with AARST guidelines. The tenants were requested to maintain closed-building conditions for twelve (12) hours prior to and during the testing. Closed building conditions appeared to have been maintained.