



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

**June 01, 2025 – November 30, 2025**

## **EH&S Lead Oversight Activity Summary**

### **June 01, 2025 – November 30, 2025**

#### **Introduction**

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, Dust Wipe Clearance activities, Visual Assessments and Risk Assessments 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. LOT also assesses property management's compliance with lead disclosure rule requirements and inspects storerooms to monitor the management and inventory of RRP supplies.

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 and/or the Lead Hazard Control Department for further action.

#### **Executive Summary**

For the period of June 1, 2025, through November 30, 2025, LOT assessed field operations across lead-based paint assessment, control, and hazard reduction activities occurring throughout NYCHA's portfolio (lead abatement, RRP, clearance examinations, and visual assessments conducted in both apartment units and common areas). In total, the team visited 150 unique developments to perform oversight of these activities.

Additionally, LOT assessed NYCHA's compliance with lead disclosure documentation ("LDD") requirements by reviewing development LDD binders and tenant folders in management offices at 131 unique developments. RRP kit supplies were also assessed in 104 unique storerooms.

During this reporting period, 25.94% of the 212 RRP jobs observed by LOT occurred in units with a child under 6 ("CU6"). Additionally, 26.67% of 390 clearance jobs observed were in a unit flagged as CU6, while 13.50% of the 200 observed lead abatement jobs were also flagged as CU6 units. There were no deficiencies identified during any RRP, lead abatement, or clearance jobs that required escalation to the Compliance Department or executive leadership. Observed deficiencies were corrected on site and/or addressed with job supervisors.

Thirteen (13) developments failed both their initial lead disclosure document inspections and subsequent reinspection and were escalated to the Compliance Department. Despite these escalations, there was an increase in the overall LDD compliance rate for this period compared to the previous reporting period, from 50.5 to 56.93%.

EHS observed an increase in the compliance rate for storeroom RRP supplies, from 83.57%

in the last 6-month certification report to 89.05% during this period. Only one (1) storeroom failed both the initial inspection and reinspection and was escalated to the Compliance Department for further action. The supplies that were most frequently missing from storerooms that failed initial inspections were the “Renovate Right” Guide pamphlets and RRP signage.

The current version of NYCHA’s Lead Safe Housing SP indicates that the NYCHA Form 060.632, “The Lead-Safe Certified Guide to Renovate Right” is to be included in the RRP kits, which are maintained in NYCHA’s storerooms. LOT identified that the guide was frequently missing from RRP storeroom supplies. However, certified renovators are obtaining the guide from other sources (Supervisors or Management Offices) and providing it to residents as indicated by the 97.17% compliance rate for distribution of the guide when LOT assesses in-progress RRP jobs. EHS believes inclusion of this guide in the renovators’ kits is an important redundancy and has provided an opportunity for the Purchasing, Logistics, and Inventory Department to correct this deficiency in all storerooms with a targeted date of December 1, 2025. In the interim, EHS will treat this item as a neutral checkpoint, meaning it is excluded from the overall storeroom compliance rate, while continuing to assess issuance of the guide during active RRP jobs.

During the reporting period, LOT observed a total of 322 visual assessments of which 215 were in-unit. All visual assessments were performed by a NYCHA vendor. LOT identified discrepancies on three of the in-unit work orders which were sent to LHC for further review. LHC’s final determination is still pending. LOT observed 105 Common Area Visual Assessments and identified seven (7) work orders for further review and evaluation by LHC. LHC determined that six (6) of the seven (7) visual assessments needed to be redone as there were missing paint deficiencies in the original work order. As a result, LHC issued a letter of direction to the vendor. Additional QA performed by LHC identified a more extensive pattern of issues with this vendor’s work orders, and the personnel responsible for the work orders was barred from performing visual assessments under the vendor’s contract. LHC was not in agreement with the deficiencies identified by LOT in the 7th work order and determined that a re-assessment was not required. In August 2025, LOT also initiated oversight of visual assessments of daycare centers as part of the LHC 2025 Community/Daycare Center project. LOT’s oversight of these jobs started at South Jamaica II. Visual assessments occurred in two (2) locations. At both locations visual assessments were conducted by LHC’s vendor and LOT did not observe any issues or deficiencies during oversight inspections.

Finally, the RFP process for lead compliance assurance was completed, and vendor UNYSE was selected to support lead oversight activities across NYCHA’s portfolio. LOT began the onboarding and training of the vendor’s personnel during this reporting period.

## Summary of Oversight Activities and Compliance Rates

June 01, 2025 – November 30, 2025

Field Oversight Activity	Agreement Section	# Observations	Total Compliance Rate	# of Jobs Escalated to Compliance
Storeroom Inspection	15(d)	137	89.05%	1
Lead Disclosure Documentation	14(g)	202	56.93% <sup>1</sup>	13
RRP	Paragraph 15	212	90.57%	0
Lead Abatement	Paragraph 14	200	99.50%	0
Post-RRP Clearance	15(j)	215	100%	0
Post-Lead Abatement Clearance	14(e)	175	100%	0
Visual Assessment QA In-Unit		215	N/A	0
Visual Assessment QA Common Area		105	N/A	0

<sup>1</sup> Lead Disclosure Documentation inspections include 2 tasks per work order – property management lead disclosure file and tenant folder review. During each tenant folder review inspection, multiple folders are typically reviewed. Additionally, not all work orders have both tasks performed. The compliance rate shown represents the overall rate for both tasks combined. See Table B for the breakdown per task.

## A. Storeroom Compliance

Task/Area Assessed	Agreement Section	June 01, 2025 – November 30, 2025		
		# Inspections Completed	#Failed Inspections	Compliance Rate (%)
Storeroom Inspections	15(d)	137	15	89.05%

## B. Lead Disclosure Documentation Compliance

Task/Area Assessed	Agreement Section	June 01, 2025 – November 30, 2025		
		# Inspections Completed	#Failed Inspections	Compliance Rate (%)
Lead Disclosure Documentation	14(g)	202	87	56.93% <sup>1</sup>
Property Management Lead Disclosure Files (Development Binder)	14(g)	181	51	71.82%
Tenant Folder Review	14(g)	186	58	68.82%

### Notes:

- A data quality review identified seven (7) Lead Disclosure Documentation inspections with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled in this report and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

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

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<sup>1</sup> Lead Disclosure Documentation inspections include 2 tasks per work order – property management lead disclosure file and tenant folder review. During each tenant folder review inspection, multiple folders are typically reviewed. Additionally, not all work orders have both tasks performed. The compliance rate shown represents the overall rate for both tasks combined. See Table B for the breakdown per task.

Task/Area Assessed	Agreement Section	June 01, 2025 – November 30, 2025		
		# Observations	Deficiencies	Compliance Rate (%)
RRP Work Verification by Personnel ( <i>Staff Response to “Are you Performing RRP?”</i> )	15(a)	212	12	94.34%
NYCHA Form 060.632, The Lead-safe Certified Guide to Renovate Right	15(f)	212	6	97.17%
NYCHA Personnel Certifications	15(b)	263	0	100%
Vendor Personnel Certifications	15(b)	0	0	N/A
Signage		212	10	95.28%
Worksite Preparation	15(e) & 15(h)	83	0	100%
Work Activities	15(e)	131	0	100%
Cleanup Activities	15(e) & 15(i)	33	0	100%
Cleanup Verification	15(e)	42	0	100%

Notes:

- A data quality review identified three (3) RRP oversight inspection with a data entry error, resulting in discrepancies between this report and the Maximo/Data Warehouse. All data discrepancies were reconciled in this report and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

#### D. Lead Abatement Compliance

Task/Area Assessed	Agreement Section	June 01, 2025 – November 30, 2025		
		# Observations	Deficiencies	Compliance Rate (%)
Occupant Protection Plan	14(c)	200	1	99.50%
Signage		200	0	100%
EPA Notice of Commencement	14(b)	200	0	100%
Lead Abatement Workers (NYCHA)	14(a)	58	0	100%
Lead Abatement Workers (Vendor)	14(a)	264	0	100%
Lead Abatement Supervisor	14(a)	200	0	100%

Work Area Preparation & Containment		64	0	100%
Work Activities		92	0	100%
Cleanup Activity		57	0	100%

Notes:

- A data quality review revealed zero (0) Lead Abatement oversight inspections with data entry errors.

### E. Clearance Examinations Compliance

Tasks/Areas Assessed	Agreement Section	June 01, 2025 – November 30, 2025		
		# Observations	Deficiencies	Compliance Rate (%)
Timing between cleanup completion and clearance examination	14(e) & 15(j)	390	0	100%
NYCHA Personnel Certifications	14(d) & 15(j)	175	0	100%
Vendor Personnel Certifications	14(d) & 15(j)	215	0	100%
Visual Inspection	14(e) & 15(j)	390	0	100%
Sample Collections	14(e) & 15(j)	339	0	100%
Post RRP		215	0	100%
Post Abatement		175	0	100%

#### NYCHA Certified Personnel

Type of Certified Personnel	Agreement Section	Post RRP	Post Abatement
Dust Wipe Technician	15(c) & 15(j)	160	0
Certified Risk Assessor		4	0
Lead-Based Paint Inspector		8	3

#### Vendor Certified Personnel

Type of Certified Personnel	Agreement Section	Post RRP	Post Abatement
Dust Wipe Technician		3	0
Certified Risk Assessor		16	81

Lead-Based Paint Inspector	15(j)	24	91
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Notes:

- A data quality review identified three (3) dust wipe clearance oversight inspection with data entry errors, resulting in discrepancies between this report and Maximo/Data Warehouse. All data discrepancies were reconciled in this report and documented in a discrepancy log with detailed explanations. The discrepancy detail is available upon request.

## F. Visual Assessment Quality Assurance (QA)

Inspection	June 01, 2025 – November 30, 2025	
	# Observations	# VA Work Orders Requiring LHC Review/Re-assessment
Visual Assessment QA In-Unit	215	3
Visual Assessment QA Common Area	105	7
Visual Assessment QA Daycare Centers	2	0

## Exhibit A: Lead Disclosure Documents Escalation Reports



### Environmental Health & Safety Department

**To:** Cassiah Ward, Chief Compliance Officer  
**From:** Patrick O'Hagan, VP Environmental Health and Safety Officer  
**Date:** July 3<sup>rd</sup>, 2025  
**Re:** June Lead Disclosure Document Re-Inspection Failures

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in June 2025. If a development was missing some or all of the required documents, it was re-inspected after approximately 10 business days.

During the review, LOT would confirm that hard copies of the following documents are 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 in a Blue 3-Ring Binder

The table below summarizes the development that failed the first inspection and the follow-up re-inspection during the month of June 2025. When developments fail the first inspection, LOT emails Property Management the Compliance Department's "Guidance for Lead Disclosure Rule Documentation," which provides instructions for retrieving lead disclosure documents to assist them with gathering the required documents.

Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
Van Dyke I	5/21/2025	6/17/2025	<ul style="list-style-type: none"><li>• 345 Livonia Ave 3D resident folder was missing form 060-275 Unit Disclosure of Information on LBP and Lead Disclosure Form 060.275 A or B or C, LBP Unit Disclosure.</li></ul>



## Environmental Health & Safety Department

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			<ul style="list-style-type: none"><li>• 395 Livonia Ave 5D, &amp; 11D resident folders were missing form 060-275 Unit Disclosure of Information on LBP and Lead Disclosure Form 060.275 A or B or C, LBP Unit Disclosure.</li></ul>
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In response to these findings of non-compliance, I request that your department initiate appropriate corrective actions against the leadership team at this location.

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



## Environmental Health & Safety Department

**To:** Manuel Quintela, Director Compliance  
**From:** Tyrone Gordils, Deputy Director Environmental Hazards  
**Date:** September 30<sup>th</sup>, 2025  
**Re:** July Lead Disclosure Document Re-Inspection Failures

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in July 2025. If a development was missing some or all of the required documents, it was re-inspected after approximately 10 business days.

During the review, LOT would confirm that hard copies of the following documents are 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 in a Blue 3-Ring Binder

The table below summarizes the development that failed the first inspection and the follow-up re-inspection during July 2025. Note that after an initial inspection failure, LOT typically emails Property Management staff the Compliance Department's written instructions for retrieving lead-disclosure documents; this did not occur at the locations below.

Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
Hylan	6/24/2025	7/9/2025	<ul style="list-style-type: none"> <li>• Missing entries in the binder tracking log.</li> </ul>
Morris	6/24/2025	7/16/2025	<ul style="list-style-type: none"> <li>• 3603 Third Ave, 15C. Missing Form 060.275, Unit Disclosure of information on LBP in the resident's folder</li> </ul>
Morris II	6/24/2025	7/16/2025	<ul style="list-style-type: none"> <li>• 1480 Washington Avenue, 9D. The form 060-275 Unit Disclosure of information on</li> </ul>



## Environmental Health & Safety Department

			LBP in the resident folder was incorrectly completed, as the manager did not sign the forms.
Forest	7/2/2025	7/16/2025	<ul style="list-style-type: none"><li>770 East 165th Street, 7G, 975 Tinton Avenue, 9F, 765 East 163rd Street, 12C, 965 Tinton Avenue, 6D, and 730 East 165th Street, 4A. The form 060-275 Unit Disclosure of information on LBP in the resident folder and Lead Disclosure Form 060.275 A, B, or C, LBP was incorrectly completed as the manager did not sign the forms.</li></ul>
Mckinley	7/2/2025	7/16/2025	<ul style="list-style-type: none"><li>751 East 161st Street 7A, 750 East 1636d Street 6F, and 905 Tinton Ave 8A form 060-275 Unit Disclosure of information on LBP in resident folder and Lead Disclosure Form 060.275 A or B or C, LBP Unit Disclosure was incorrectly completed as the manager did not sign the form.</li></ul>

In response to these findings of non-compliance, I request that your department initiate appropriate corrective actions against the leadership team at this location.

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



## Environmental Health & Safety Department

**To:** Manuel Quintela, Director Compliance  
**From:** Tyrone Gordils, Deputy Director Environmental Hazards  
**Date:** September 30<sup>th</sup>, 2025  
**Re:** August Lead Disclosure Document Re-Inspection Failures

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in August 2025. If a development was missing some or all of the required documents, it was re-inspected after approximately 10 business days.

During the review, LOT would confirm that hard copies of the following documents are 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 in a Blue 3-Ring Binder

The table below summarizes the developments that failed the first inspection and the follow-up re-inspection during August 2025. When a development fail the first inspection, LOT emails property management the Compliance Department's "Guidance for Lead Disclosure Rule Documentation," which provides instructions for retrieving lead disclosure documents to assist them with gathering the required documents.

Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
Morris	6/24/2025	8/29/2025	<ul style="list-style-type: none"> <li>• 3603 Third Ave, 15C. Missing Form 060.275, Unit Disclosure of information on LBP in the resident's folder, and Lead Disclosure Form 060.275 A, B, or C, LBP Unit Disclosure.</li> </ul>
Morris II	6/24/2025	8/29/2025	<ul style="list-style-type: none"> <li>• 1465 Washington Avenue #8F, 1480 Washington Avenue, 9D. Missing form 060-275 Unit Disclosure of</li> </ul>



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			<p>information on LBP in the resident folder and the Lead Disclosure Form 060.275 A, B, or C, LBP Unit Disclosure was incorrectly completed, as the manager did not sign the forms.</p>
Forest	7/2/2025	8/29/2025	<ul style="list-style-type: none"> <li>770 East 165th Street, 7G, 975 Tinton Avenue, 9F, 765 East 163rd Street, 12C, 965 Tinton Avenue, 6D, and 730 East 165th Street, 4A. The form 060-275 Unit Disclosure of information on LBP in the resident folder and the Lead Disclosure Form 060.275 A, B, or C, LBP Unit Disclosure was incorrectly completed as the manager did not sign the forms. <i>(It should be noted that the re-inspection WO#138966553 did not show up in Maximo after the submission on the handheld device).</i></li> </ul>
Mckinley	7/2/2025	8/29/2025	<ul style="list-style-type: none"> <li>750 East 1636d Street 6F, 751 East 161st Street 7A, and 905 Tinton Ave 8A form 060-275 Unit Disclosure of information on LBP in resident folder and the Lead Disclosure Form 060.275 A or B or C, LBP Unit Disclosure was incorrectly completed as the manager did not sign the form.</li> </ul>



## Environmental Health & Safety Department

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In response to these findings of non-compliance, I request that your department initiate appropriate corrective actions against the leadership team at this location.

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



## Environmental Health & Safety Department

**To:** Manuel Quintela, Director Compliance |  
**From:** Tyrone Gordils, Deputy Director, Environmental Hazards  
**Date:** October 15<sup>th</sup>, 2025  
**Re:** September [Lead](#) Disclosure Document Re-Inspection Failures

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in September 2025. If a development was missing some or all of the required documents, it was re-inspected after approximately 10 business days.

During the review, LOT would confirm that hard copies of the following documents are 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 in a Blue 3-Ring Binder

The table below summarizes the development that failed the first inspection and the follow-up re-inspection during September 2025. When developments fail the first inspection, LOT emails property management the Compliance Department's "Guidance for Lead Disclosure Rule Documentation," which provides instructions for retrieving lead disclosure documents to assist them with gathering the required documents.

Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
Mariner Harbor	9/09/2025	9/29/2025	<ul style="list-style-type: none"><li>• The tracking log was missing the date and the signature of the Neighborhood Administrator.</li></ul>
Ravenswood	09/11/2025	9/29/2025	<ul style="list-style-type: none"><li>• 35-21 21<sup>st</sup> Street, 3A, 21-30<sup>th</sup> 35<sup>th</sup> Avenue, 4H, 21-40 35<sup>th</sup> Avenue, 4D, 35-20 24<sup>th</sup> Street, 5A, and 35-52 24<sup>th</sup> Street, 2E, The form 060-275 Unit Disclosure of information on</li></ul>



## Environmental Health & Safety Department

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			LBP in the resident folder and the Lead Disclosure Form 060.275 A, B, or C, LBP Unit Disclosure was incorrectly completed, as the manager did not sign the form.
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In response to these findings of non-compliance, I request that your department initiate appropriate corrective actions against the leadership team at this location.

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



## Environmental Health & Safety Department

**To:** Manuel Quintela, Director Compliance  
**From:** Tyrone Gordils, Deputy Director, Environmental Hazards  
**Date:** November 26<sup>th</sup>, 2025  
**Re:** October Lead Disclosure Document Re-Inspection Failures

The EH&S Lead Oversight Team (LOT) reviewed the Lead Disclosure Documents at various developments in October 2025. If a development was missing some or all of the required documents, it was re-inspected after approximately 10 business days.

During the review, LOT would confirm that hard copies of the following documents are 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 in a Blue 3-Ring Binder

The table below summarizes the development that failed the first inspection and the follow-up re-inspection during October 2025. When developments fail the first inspection, LOT emails property management the Compliance Department's "Guidance for Lead Disclosure Rule Documentation," which provides instructions for retrieving lead disclosure documents to assist them with gathering the required documents.

Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
TODT HILL	9/17/2025 W/O 139348043	10/2/2025 W/O 139679102	The tracking log was missing, the date and the signature of the Neighborhood Administrator.

In response to these findings of non-compliance, I request that your department initiate appropriate corrective actions against the leadership team at this location.

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

## Exhibit B: Storeroom RRP Supplies Escalation Report



### Environmental Health & Safety Department

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**To:** Manuel Quintela, Director Compliance  
**From:** Tyrone Gordils, Deputy Director, Environmental Hazards  
**Date:** December 9<sup>th</sup>, 2025  
**Re:** November RRP Storeroom Re-Inspection Failures

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The EH&S Lead Oversight Team (LOT) inspected Storerooms to ensure that RRP-related supplies are available to staff at various developments in November 2025. If a development was missing some or all of the required RRP materials, it was re-inspected after approximately 10 business days.

During the inspection, LOT would confirm that all RRP materials listed within the Lead SP are present in a development's storeroom.

Purchasing, Logistics and Inventory ensures an adequate amount of supplies from the list below are maintained. It is required that the materials, with the exception of the HEPA vacuum, be prepackaged as a kit by including all the items listed below and assigned to certified renovators as needed.

- HEPA vacuum and filters
- Six mil polyethylene sheeting (for floors)
- Two mil polyethylene sheeting (for furniture and fixtures)
- Six mil polyethylene bags
- Flip mops
- Wet disposable soft wipes
- Three string mops
- Three buckets and wringer(s)
- Lead-specific cleaning detergent or equivalent
- Water mister or spray bottle
- Duct tape
- Painter's tape
- Utility knife
- Paper towels/rags
- NYCHA Form 060.632, The Lead-Safe Certified Guide to Renovate Right
- NYCHA Form 088.182, Renovation, Repair, and Painting Safety Sign

The table below summarizes the development that failed the first inspection and the follow-up re-inspection during the month of November. When a development fails the first inspection, LOT emails the storeroom supervisor, who provides instructions for the storekeeper to correct the failed items.



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Development	First Inspection Date	Re-Inspection Date	Failed Re-Inspection
Red Hook East	11/6/2025 W/O 140710321	11/25/2025 W/O 141061591	The storeroom was missing the prepackaged RRP supply kit.

In response to this finding of non-compliance, EHS requests that your department initiate appropriate corrective actions against the leadership team at this location.

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