

Form 2.1 Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5

Pursuant to 24 CFR 58.35(a)

Responsible Entity: New Jersey Department of Community Affairs, Charles Richman, Commissioner

Applicant Name ABDUR (First) RAFIQ (Last)

-or- (Business/Project Name)

Project Location 34 N MARYLAND AVE, (Street Address)

Atlantic City (Municipality) Atlantic (County) NJ (State)

301 (Block) 22 (Lot)

CONDITIONS FOR APPROVAL

Conditions for Approval [40 CFR 1505.2(c)]: (List all mitigation and project modification measures required by the Responsible Entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as required. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.)

The following mitigation measures are required as conditions for approval of the project:

General

- 1. Acquire all required federal, state and local permits prior to commencement of construction and comply with all permit conditions.*
- 2. If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for reevaluation under the National Environmental Policy Act.*

Air Quality

- 3. Use water or chemical dust suppressant in exposed areas to control dust.*
- 4. Cover the load compartments of trucks hauling dust-generating materials.*
- 5. Reduce vehicle speed on non-paved areas and keep paved areas clean.*
- 6. Retrofit older equipment with pollution controls.*
- 7. Establish and follow specified procedures for managing contaminated materials discovered or generated during construction.*
- 8. Employ spill mitigation measures immediately upon a spill of fuel or other hazardous material.*
- 9. Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c). Such equipment includes, but is not limited to, the following:*
 - a. Any commercial fuel combustion equipment rated with a maximum heat input of 1,000,000 British Thermal Units*

per hour or greater to the burning chamber (N.J.A.C. 7:27-8.2(c)1);

b. Any stationary storage tank for volatile organic compounds with a capacity of 2,000 gallons and a vapor pressure of 0.02 pounds per square inch or greater (N.J.A.C. 7:27-8.2(c)9);

c. Any tank, reservoir, container, or bin with capacity in excess of 2,000 cubic feet used for storage of solid particles (N.J.A.C. 7:27-8.2(c)10); and

d. Any stationary reciprocating engine with a maximum rated power output of 37 kW or greater, used for generating electricity, not including emergency generators (N.J.A.C. 7:27-8.2(c) 21).

10. Minimize idling and ensure that all on-road vehicles and non-road construction equipment operated at or visiting the project site comply with the applicable smoke and "3-minute idling" limits (N.J.A.C. 7:27-14.3, 14.4, 15.3 and 15.8).

11. Ensure that all diesel on-road vehicles and non-road construction equipment used on or visiting the project site use ultra-low sulfur fuel (less than 15 ppm sulfur) in accordance with the federal Non-road Diesel Rule (40 CFR Parts 9, 69, 80, 86, 89, 94, 1039, 1051, 1065, 1068).

12. Operate, if possible, newer on-road diesel vehicles and non-road construction equipment equipped with tier 4 engines, or equipment equipped with an exhaust retrofit device.

Floodplain Management and Flood Insurance

13. Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required.

14. No funding will be provided to any person who previously received federal flood disaster assistance conditioned on obtaining and maintaining flood insurance, but failed to obtain and maintain the insurance [24 CFR 58.6(b)].

Hazardous Materials

15. All activities must comply with applicable federal, state, and local laws and regulations regarding asbestos, including but not limited to the following:

- National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145*
- National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150*
- NJAC 7:26-2.12—Generator requirements for disposal of asbestos containing waste materials*
- New Jersey Asbestos Control and Licensing Act, N.J.S.A. 34:5A-32 et seq.*

16. Applicant must comply with all laws and regulations concerning the proper handling, removal and disposal of hazardous materials (e.g. asbestos and lead-based paint) or household waste (e.g. construction and demolition debris, pesticides/herbicides, white goods).

17. All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to HUD's lead-based paint regulations in 24 CFR Part 35 Subparts B, H, and J.

18. All residential structures must be free of mold attributable to Superstorm Sandy.

FINDING

☐ This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR

☒ This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR

☐ This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

FUNDING INFORMATION

Note: Certification signatures can be found at the end of the document.

Grant Number	HUD Program	Funding Amount
B-13-DS-34-0001	Landlord Rental Repair Program (LRRP)	\$250,000.00
		\$0.00
		\$0.00

Estimated Total HUD Funded Amount:

\$250,000.00

Estimated Total HUD Funded Amount Description

The LRRP Program provides up to \$50,000 per unit in grant funding assistance to eligible owners of rental property from 1 to 25 units. For this application, the HUD funding amount is \$250,000.00 for the rehabilitation of five residential units (Units 1, 2, 3, 4 and 5) within a multifamily structure (5 or more units) and the abandonment of the structure's basement.

Estimated Total Project Cost [24 CFR 58.32(d)]: (HUD and non-HUD funds)

\$376,343.43

Estimated Total Project Cost Description

The total project cost is \$376,343.43 based on the Estimated Cost of Repair documents.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of this proposed project is the rehabilitation of five residential units (Units 1, 2, 3, 4 and 5) within a

multifamily structure (5 or more units) and abandonment of the structure's basement, which is below Base Flood Elevation, located at 34 North Maryland Avenue, in Atlantic City, Atlantic County, New Jersey (Block 301, Lot 22). The proposed abandonment of the basement would be accomplished by filling the basement with approximately 222 cubic yards of engineered fill (see SRP0043415_GilbaneABFE). Elevation of the multifamily structure is not proposed. Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required. The Landlord Rental Repair Program (LRRP) provides up to \$50,000 per unit in grant funding assistance to eligible owners of rental property from 1 to 25 units. The proposed project is needed to repair damage to the residential units that occurred as a result of Superstorm Sandy.

Description of the Proposed Project [24 CFR 50.12 & 58.32, 40 CFR 1508.25]: (Include all contemplated actions that are logically either geographically or functionally a composite part of the project, regardless of the source of funding. As appropriate, attach maps, site plans, renderings, photographs, budgets, and other descriptive information.)

The LRRP Program provides up to \$50,000 per unit in grant funding assistance to eligible owners of rental property from 1 to 25 units. The LRRP Program will provide funding to help rental property owners repair their rental properties damaged by Superstorm Sandy.

The proposed action involves the rehabilitation of five residential units (Units 1, 2, 3, 4 and 5) within a multifamily structure (5 or more units) and abandonment of the structure's basement, which is below Base Flood Elevation, located at 34 North Maryland Avenue, in Atlantic City, Atlantic County, New Jersey (Block 301, Lot 22). The multifamily structure, built between 1921 and 1933 according to a review of historical aerial photographs and Sanborn Fire Insurance maps, contains a total of five units (see SRP0043415_BuildDate). Elevation of the multifamily structure is not proposed (see SRP0043415_ProjectActivityUpdate). Elevation of the building is not included in the project activity as the applicant proposes to abandon the existing basement, which is below Base Flood Elevation, by filling it with approximately 222 cubic yards of engineered fill (see SRP0043415_GilbaneABFE). Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required. The parcel on which the multifamily structure is located occupies approximately 0.0429 acres of land based on property tax records (see SRP0043415_TaxCard). The scope of work includes rehabilitation of the common area including replacement of natural gas boiler, water heater, batt insulation, polyethylene vapor barrier, hazardous material remediation (lead-based paint abatement per lead-based paint survey report), replacement of drywall, baseboard, underlayment, vinyl floor covering, exterior door, lockset and deadbolt, sealing/priming/painting of walls, ceilings, baseboards, door/window trim, jamb, door slab, replacement of bitumen roof, rigid foam insulation board, aluminum gutter/downspout and flashing. Rehabilitation activities for Units 1, 2, 3, 4, and 5 include replacement of I-joists, sheathing, batt insulation, baseboard heat, foam pipe insulation, backflow preventers, water supply line, carbon monoxide detectors, outlets, switches, smoke detectors, breaker panels and circuit breakers, rewiring with copper wire, coaxial television cables, grounding rods, meter masts for overhead power, telephone backerboards, hazardous waste/mold cleaning, hazardous material remediation (asbestos-containing materials abatement and lead-based paint abatement per survey reports), removal and replacement of drywall, baseboard and casing, replacement of vinyl floor covering and underlayment, replacement of exterior doors and knobs, interior doors and knobs, replacement of vinyl windows, sealing/priming/painting of walls, ceilings, baseboards, door slab, and door/window trim, jambs, and openings, replacement of kitchen sinks, sink faucets, range hoods, ductwork, countertops, cabinetry, backsplashes, kitchen appliances, light fixtures, ceiling fans, toilets and

seats, bathroom fixtures, tubs/showers and faucets, bathroom ventilation fan/light/heater, carpets and carpet pads and roughing in plumbing,. The total estimated cost of repair is \$376,343.43 and is considered major rehabilitation as the cost of repair is greater than 50 percent of the pre-disaster market value of the entire structure, \$100,000.00, as reported on the tax record (see property tax card file SRP0043415_TaxCard). See attached Project Location Map file SRP0043415_ProjectLocationMap and photo log file SRP0043415_Photolog.

STATUTORY CHECKLIST [24 CFR 50.4, 24 CFR 58.5]

DIRECTIONS - For each authority, check either Box "A" or "B" under "Status."

"A box" The project is in compliance, either because: (1) the nature of the project does not implicate the authority under consideration, or (2) supporting information documents that project compliance has been achieved. In either case, information must be provided as to WHY the authority is not implicated, or HOW compliance is met; OR

"B box" The project requires an additional compliance step or action, including, but not limited to, consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit.

IMPORTANT: Compliance documentation consists of verifiable source documents and/or relevant base data.

Appropriate documentation must be provided for each law or authority. Documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties. Proprietary material and studies that are not otherwise generally available for public review shall be included in the ERR. Refer to HUD guidance for more information.

Statute, Authority, Executive Order, Regulation, or Policy cited at 24 CFR §50.4 & 58.5	STATUS	Compliance Documentation
1. Air Quality [Clean Air Act, as amended, particularly sections 176(c) & (d), and 40 CFR 6, 51, 93]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation, but not does not include acquisition of undeveloped land, change of land use, demolition, or new construction.</p> <p>According to the U.S. Environmental Protection Agency (USEPA), Atlantic County has been designated a nonattainment or maintenance area for three National Ambient Air Quality Standards (NAAQS) (see SRP0043415_USEPANonAttainmentMaintenanceforNAAQS):</p> <ul style="list-style-type: none"> • a moderate nonattainment area for 8-hour ozone (1997 Standard) • a marginal nonattainment area for 8-hour ozone (2008 Standard) • a non-classified maintenance area for carbon monoxide <p>Emissions associated with the proposed project are estimated to be well below the threshold when compared to the federal General Conformity Rule de minimis thresholds.</p> <p>There will be temporary, unavoidable increases in particulate matter levels during the proposed repairs and rehabilitation of the building. While air quality may be temporarily affected during improvement activities, the proposed project will adhere to state air quality standards (N.J.A.C. 7:27-1 et seq.). Air quality effects will be mitigated to the extent feasible.</p> <p>The Division of Air Quality (DAQ) has revised the General Conformity Applicability Analysis for the DCA, HUD Community Development Block Grant for Disaster Recovery (CDBG-DR) for the Hurricane Sandy recovery efforts according to a memorandum from the DAQ dated January 23, 2014 (see SRP0043415_RevisedGeneralConformityApplicability). The general conformity analysis is required by the Clean Air Act and Federal Regulation (40 CFR Part 93, (Subpart B)). This revision is due to updated information received from the Sandy Recovery Environmental and Historic Preservation Review Program regarding commercial construction activities associated with the CDBG-DR, which were not assessed in the original environmental assessment. The revised estimated air emissions, including the air emissions related to commercial construction activities, continue to remain well below the Federal General Conformity regulation's de minimis thresholds and are presented to conform to the State Implementation Plan (SIP).</p> <p>To avoid adverse air quality impacts, compliance with the regulatory requirements of New Jersey's Air Rules continues to remain in effect. Activities must still meet the State's Air Pollution Control requirements, e.g., obtaining permits when necessary, adherence to idling limitations, and implementation of all reasonable measures to mitigate dust and fugitive emissions from demolition and construction.</p>
2. Airport Hazards [Clear Zones and Accident Potential Zones] [24 CFR 51D]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation, but does not include acquisition for construction, change in land use, increase in density, or new construction.</p> <p>The restrictions on construction and major rehabilitation of structures in runway protection zones (formerly called runway clear zones) apply to civil airports (24 CFR 51.303). Civil airports are defined as commercial service airports designated in the Federal Aviation Administration's National Plan of Integrated Airport Systems (NPIAS) (24 CFR 51.301(c)). Within the 9 counties most impacted by Superstorm Sandy, the only New Jersey airports listed as commercial service airports in the current NPIAS are Newark Liberty International Airport in Essex and Union Counties and Atlantic City International Airport in Atlantic County. Runway protection zones extend up to half a mile from the ends of runways along flight paths, and become wider as distance from the runway increases. Newark Liberty International Airport is located approximately 91 miles to the north of the project location, and Atlantic City International Airport is located approximately 9 miles to the northwest of the project location (see SRP0043415_AirportHazardsMap).</p> <p>HUD regulations also include restrictions on construction and major rehabilitation in clear zones and accident potential zones associated with runways at military airfields (24 CFR 51.303). The only military airfield in New Jersey with clear zones and accident potential zones subject to these restrictions is the Lakehurst Naval Air Station. The clear zones and accident potential zones associated with the Lakehurst Naval Air Station are located in Burlington County and Ocean County. The proposed project is not located within an airport clear zone or the Lakehurst Accident Potential Zone, which is located approximately 44 miles north of the proposed project location (see SRP0043415_AirportHazardsMap).</p>

3. Coastal Zone Management [Coastal Zone Management Act sections 307(c) & (d)]	<input checked="" type="radio"/> A <input type="radio"/> B	<p><i>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation, but does not include acquisition of undeveloped land, change of land use, or new construction.</i></p> <p><i>Per the New Jersey Department of Environmental Protection's (NJDEP) HUD Environmental Review Tool, the proposed project is located within the Coastal Area Facility Review Act (CAFRA) Zone (see SRP0043415_CoastalZoneManagementMap). However, the NJDEP Division of Land Use Regulation (DLUR) has determined that the action (rehabilitation without elevation) does not require permits under the Coastal Permit Program and that no additional consultation or approval is required. DLUR has previously stated that rehabilitation projects without elevation do not require Coastal permits from the State as internal construction and minor external construction (roofing/siding) are not regulated (see SRP0043415_DLURNoConsultation).</i></p> <p><i>The proposed project is not located within the Hackensack Meadowlands or Upland Waterfront Development Zone and permits pursuant to these applicable statutes are not required.</i></p>
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4. Contamination and Toxic Substances [24 CFR 50.3(i) & 58.5(i)(2)]	<input type="radio"/> A <input checked="" type="radio"/> B	<p><i>Of the applicable activities, it involves rehabilitation but not acquisition, change of use to residential, demolition, leasing, new construction, or construction or improvements to infrastructure.</i></p> <p><i>HUD policy requires that the proposed site and adjacent areas be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants of the property or conflict with the intended use of the property.</i></p> <p><i>To identify sites near the proposed project location that have hazardous materials, contamination, toxic chemicals, gases and radioactive substances as specified in 24 CFR 58.5(i), a review of the NJDEP's HUD Environmental Review Tool was conducted. This review identified that the project location is located within the 3,000-foot radius of one (1) "threatening" site (see SRP0043415_ContaminationandToxicSubstancesMap). The site is identified as 508 Sewell Avenue with a Site ID number reported as 65274. The site was reviewed by NJDEP, which has found this site to be in substantial compliance with NJDEP regulations and is therefore considered under control. No other investigations are required, and the analysis is concluded (see SRP0043415_NJDEPResponse).</i></p> <p><i>The parcel may be within the 3,000 foot radius of a Hazardous Waste cleanup site, Landfill, solid waste cleanup site or Hazardous Waste facility that handles hazardous materials or toxic substances; however, all sites that were determined by NJDEP to be "non-threatening" to the potential HUD project are not depicted on the map. Only sites determined to be "threatening" by the NJDEP are depicted on the map.</i></p> <p><i>The site reconnaissance performed on August 3, 2015, revealed no visible recognized environmental conditions (RECs) in the vicinity of the proposed project (see SRP0043415_FieldInspectionReport). There were no obstacles to identification of RECs. In addition, the proposed project site is not listed on a State or Federal Hazardous Waste sites database (see SRP0043415_ContaminationandToxicSubstancesMap).</i></p> <p><i>All solid waste materials must be managed and transported in accordance with the state's solid and hazardous waste rules.</i></p> <p>Asbestos</p> <p><i>The multifamily structure containing the LRRP-assisted units was constructed between 1921 and 1933 (based on historical aerial photographs and Sanborn Fire Insurance maps; see SRP0043415_BuildDate); because the structure was constructed prior to 1980, asbestos is a potential concern.</i></p> <p><i>Asbestos surveys of the common area, Unit 1, Unit 2, Unit 3, Unit 4 and Unit 5 were conducted by the PARS Environmental Inc. (PARS) in June 2015. PARS collected samples for asbestos analysis from the common area, Unit 1, Unit 2, Unit 3, Unit 4 and Unit 5. None of the samples collected from the common area, Unit 2, Unit 3, Unit 4 or Unit 5 tested positive for asbestos. Two (2) of ten (10) samples collected from Unit 1 tested positive for asbestos. PARS stated that results presented in the survey reports are limited and asbestos may be present in any untested materials (see SRP0043415_AsbestosSurvey_CommonArea; SRP0043415_AsbestosSurvey_Unit1; SRP0043415_AsbestosSurvey_Unit2; SRP0043415_AsbestosSurvey_Unit3; SRP0043415_AsbestosSurvey_Unit4; and SRP0043415_AsbestosSurvey_Unit5).</i></p> <p><i>Based on the results of the sampling, asbestos-containing materials were identified within Unit 1, but not the common area, Unit 2, Unit 3, Unit 4 or Unit 5. Potential asbestos hazards should be managed in accordance with applicable regulations. All proposed project activities must comply with applicable federal, state, and local laws and regulations regarding asbestos.</i></p> <p>Lead-based Paint</p> <p><i>The multifamily structure containing the LRRP-assisted units was constructed between 1921 and 1933 (based on historical aerial photographs and Sanborn Fire Insurance maps; see SRP0043415_BuildDate); because the structure was constructed prior to 1978, lead-based paint (LBP) is a potential concern.</i></p> <p><i>Lead-Based Paint Risk Assessments were completed for the common area, Unit 1, Unit 2, Unit 3, Unit 4 and Unit 5 by PARS in June 2015.</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of the common area: third floor hall walls, third floor balusters, stair stringers (all), second floor hall walls, exterior entrance arching awning, and all exterior window frames. In addition, PARS identified lead dust hazards throughout the interior floors of the common area. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in the common area to remove lead dust hazards from the property (see SRP0043415_LeadBasedPaintRiskAssessment_CommonArea).</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of Unit 1: utility room archway to kitchen. In addition, PARS identified lead dust hazards throughout the interior floors of Unit 1. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in Unit 1 to remove lead dust hazards from the property (see SRP0043415_LeadBasedPaintRiskAssessment_Unit1).</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of Unit 2: living room closet jamb, baseboards throughout the unit, bedroom closet jamb, bedroom door jamb, and bedroom door frame. LBP observed as being in poor condition and presenting a current LBP hazard included paint on window frames and sills throughout Unit 2. In addition, PARS identified lead dust hazards throughout the interior floors of Unit 2. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in Unit 2 to remove lead dust hazards and deteriorated LBP noted on the window frames and sills (see SRP0043415_LeadBasedPaintRiskAssessment_Unit2).</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of Unit 3: kitchen baseboards, kitchen door jamb, and bedroom door frame. LBP observed as being in poor condition and presenting current LBP hazards included the kitchen window sill and frame, bedroom window frames, and bathroom window sill and frame. In addition, PARS identified the unit's kitchen floor as a lead dust hazard. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in Unit 3 to remove the identified lead dust hazard and deteriorated LBP noted at several locations within Unit 3 (see SRP0043415_LeadBasedPaintRiskAssessment_Unit3).</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of Unit 4: bedroom closet and door jams, bathroom door frame and jamb, living room baseboards, closet frame and closet jamb, kitchen archway, baseboards and door frame, and hall baseboards. LBP observed as being in poor condition and presenting current LBP hazards included the bedroom window sills and frames and living room window sills and frames. In addition, PARS identified the unit's hall floor, bedroom floor, bathroom floor, kitchen window sill and bedroom window sills as lead dust hazards. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in Unit 4 to remove the identified lead dust hazards and deteriorated LBP noted at several locations within Unit 4 (see SRP0043415_LeadBasedPaintRiskAssessment_Unit4).</i></p> <p><i>Intact LBP surfaces were discovered in the following areas of Unit 5: living room closet jamb, living room archway, baseboards throughout the unit, bedroom closet frame and door jamb, and bathroom door frame. LBP observed as being in poor condition and presenting current LBP hazards included windows and window components throughout the unit. In addition, PARS identified the unit's living room floor, bathroom floor, kitchen window sills and bedroom window sills as lead dust hazards. PARS stated that no bare or exposed soil was observed at the time of the assessment, therefore, no soil sampling for lead contamination was required. PARS recommended interim controls for identified intact LBP surfaces, including paint film stabilization and enclosure or encapsulation, to temporarily reduce human exposure or possible exposure to LBP hazards. PARS also recommended LBP abatement be performed in Unit 5 to remove the identified lead dust hazards and deteriorated LBP noted at several locations within Unit 5 (see SRP0043415_LeadBasedPaintRiskAssessment_Unit5).</i></p> <p><i>All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to HUD's lead-based paint regulations in 24 CFR Part 35 Subparts B, H, and J. Future remodeling precautions with respect to LBP at the project site are summarized in Section 9.0 of each of the Lead-Based Paint Risk Assessment reports.</i></p> <p>Radon</p> <p><i>No testing or mitigation is required for structures that are in areas with ranks of Tier 3 or Tier 2. The project is located in a Tier 3 area; therefore, no radon testing or mitigation is required (see SRP0043415_RadonPotentialMap).</i></p>
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5. Endangered Species [Endangered Species Act of 1973, particularly section 7; 50 CFR 402]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation but does not involve demolition, new construction, acquisition of undeveloped land, or change of land use.</p> <p>The environmental review considered potential impacts of the HUD-assisted project to threatened and endangered (T and E) species and, for animals, critical habitats. The review evaluated potential impacts not only to any listed, but also to any proposed or candidate endangered or threatened species and critical habitats. Projects that affect T and E species or critical habitats require consultation with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS), in compliance with the procedure of Section 7 of the Endangered Species Act.</p> <p>The NJDEP ArcGIS Screening Tool Centroid layer indicates that federally and state-listed T and E species are not documented on the project site. Review of the individual NJDEP HUD Environmental Review Tool layers for piping plover, red knot and bats (northern long-eared bat and Indiana bat) indicate that piping plover, red knots and bats are not present on the project site or immediately surrounding properties (see SRP0043415_EndangeredSpeciesMap). As a result, coordination with the NJDEP Division of Fish and Wildlife, Endangered Species Program (ENSP) was not required.</p> <p>As the proposed project involves major rehabilitation of five units within an existing multifamily structure, consultation with the NJDEP State Forestry Services – Natural Heritage Program (NHP) regarding plant species and use of the USFWS IPaC landscape explorer tool was required.</p> <p>Consultation with NHP determined, in the Table 1: On Site Data Request Search Results under the Rare Plants/Ecological Communities Possibly On Site category, that no rare plant species, ecological communities, rare wildlife species or wildlife habitat, vernal pool habitats or other animal species tracked by the Endangered and Nongame Species Program are documented on the proposed project site. Consultation with NHP determined, in Table 2: Vicinity Data Request Search Results, that no rare plant species, ecological communities, natural heritage priority sites, rare wildlife species or wildlife habitat, vernal pool habitat or other animal species tracked by the Endangered and Nongame Species Program are located within the immediate vicinity (one quarter mile) of the proposed project (see SRP0043415_NJDEPNaturalHeritageProgramResponse).</p> <p>The USFWS IPaC landscape explorer tool was used to generate a list of any federally listed endangered species on the project site or in the project vicinity (see SRP0043415_IPaCResults). Results of this screening indicate that no critical habitats are located on the project site or in the project vicinity. The screening also identified three species to be considered as part of the project's effect analysis including piping plover, red knot, and seabeach amaranth. Based on review of the NJDEP ArcGIS Screening Tool and results of NHP consultation, piping plover, red knot, and seabeach amaranth are not present on or in the immediate vicinity of the proposed project; therefore, these species will not be impacted by the proposed project. In addition, the IPaC tool identified 24 migratory birds on or within the vicinity of the proposed project site. Because tree cutting and vegetation removal are not part of the proposed project activity, the project will not affect migratory birds.</p>
6. Environmental Justice [Executive Order 12898]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation but does not involve acquisition, change of land use, demolition, new construction, or an adverse impact or condition with respect to an environmental issue.</p> <p>The thresholds for minority and low-income populations in New Jersey are 48.52 percent (urban areas) and 18.58 percent, respectively. The project area covers Census blocks that include environmental justice communities. The project area contains Census tracts and blocks with moderate environmental justice communities, i.e., minority populations ranging from approximately 30 percent to 40 percent and populations below poverty level ranging from approximately 10 percent to 20 percent (see SRP0043415_EnvironmentalJusticeMapPercentMinority and SRP0043415_EnvironmentalJusticeMapPercentBelowPoverty).</p> <p>The project would not generate adverse resource or health effects or adversely impact residential, commercial, or community facilities or services that may be of importance to environmental justice communities. The project would not generate disproportionately high and adverse environmental impacts on environmental justice communities (see SRP0043415_EnvironmentalJusticeChecklist).</p>
7. Explosive and Flammable Operations [24 CFR 51C]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. It does not involve any of the applicable activities: a residential project involving new construction, rehabilitation where unit density is increased, change of land use to residential, vacant buildings made habitable or any project for industrial, commercial, institutional or recreational use, when the activity is new construction or change of land use.</p> <p>The definition of "HUD-assisted project" at 24 CFR 51.201 is predicated on whether the proposed project increases the number of people exposed to hazardous operations. Therefore, the environmental review for grants to rehabilitate or mitigate housing that existed prior to the disaster is not required to apply the acceptable separation distance (ASD) standards in 24 CFR Part 51C where the number of dwelling units is not increased and the activities are limited to the existing footprint. As a result of the project's proposed action (rehabilitation of five units within a multifamily structure where elevation is not proposed), the number of dwelling units would not increase, and the activities would be limited to the existing footprint of the multifamily structure.</p>
8. Farmland Protection [Farmland Protection Policy Act of 1981, particularly sections 1504(b) & 1541; 7 CFR 658]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. It does not involve any of the applicable activities: acquisition of undeveloped land, conversion of undeveloped land, new construction or site clearance.</p> <p>Review of the NJDEP's HUD Environmental Review Tool indicated that the property involved in the proposed project does not include prime farmland or farmland of unique importance as identified by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS, formerly the Soil Conservation Service) or farmland of statewide importance (see SRP0043415_FarmlandProtectionMap).</p>

9. Floodplain Management [24 CFR 55; Executive Order 11988, particularly section 2(a)]	<input type="radio"/> A <input checked="" type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves rehabilitation or repair, but does not include acquisition, disposition, financing or leasing existing building, building construction or construction of or improvements to infrastructure.</p> <p>Elevation of the building is not included in the project activity as the applicant proposes to abandon the existing basement, which is below Base Flood Elevation, by filling it with approximately 222 cubic yards of engineered fill (see SRP0043415_GilbaneABFE). Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required.</p> <p>The presence of a Special Flood Hazard Area (100-year floodplain, zones A or V) was determined by using the NJDEP's HUD Environmental Review Tool. Per the screening tool, it has been determined that the entire proposed action is located in a 100-year floodplain, i.e., Zone AE, with the Federal Emergency Management Agency (FEMA) Preliminary Flood Insurance Rate Map (FIRM) layer applied. The FEMA Preliminary FIRMs layer is the first "best available information" in the screening tool (see SRP0043415_FloodplainManagementMap).</p> <p>Per the FEMA National Flood Insurance Program FIRM Map for the City of Atlantic City, New Jersey, Atlantic County, Panel 5 of 5, Community-Panel Number 3452780005D, dated August 15, 1983, the entire proposed project is located within Zone A8. Zone A8 is identified as areas of 100-year flood where base flood elevation and flood hazard factors have been determined (see SRP0043415_FIRM3452780005D).</p> <p>The total estimated cost of repair is \$376,343.43 and is considered major rehabilitation (substantially damaged) as the cost of repair is greater than 50 percent of the pre-disaster market value of the entire structure, \$100,000.00, as reported on the tax record (see property tax card file SRP0043415_TaxCard).</p> <p>Based on the information above, an 8-step floodplain analysis is being conducted to determine whether the proposed project would have adverse effects on the floodplain. The results of the 8-step floodplain analysis indicate that there are no practicable alternatives to the proposed project (see SRP0043415_8-StepProcessFloodplainAnalysis). An early public notification was posted on August 14, 2015, with a comment period of 15 days (see SRP0043415_EarlyFloodplainNotice). No comments were received (see SRP0043415_FloodplainEarlyNoticeComments). Steps 7 and 8 of the 8-Step process are not yet completed, but will be as follows:</p> <p>Step 7: Determination of No Practicable Alternative</p> <p>A final public notice will be published in accordance with 24 CFR Part 55 for a minimum of 7-day comment period. The notice shall state the reasons why the project must be located in the floodplain, provide a list of alternatives considered, and all mitigation measures to be taken to minimize adverse impacts and preserve natural and beneficial floodplain values. All comments received during the comment period will be responded to and fully addressed prior to funds being committed to the proposed project, in compliance with Executive Order 11988 or 24 CFR Part 55.</p> <p>Step 8: Implement the Proposed Action</p> <p>Implementation of the proposed action may require additional local and state permits, which could place additional design modifications or mitigation requirements on the project.</p> <p>NFIP flood insurance is required as the project activity involves rehabilitation of five units within a multifamily structure within a FEMA-identified Special Flood Hazard Area.</p> <p>Rehabilitation projects located in floodplains do not require a Flood Hazard Area permit from DLUR. Pursuant to N.J.A.C. 7:13-7.2(b)4, repair of a lawfully existing structure qualifies for a Permit-by-Rule. Projects involving rehabilitation of individual units within a multi-family building where elevation is not proposed are also included in this provision.</p>
10. Historic Preservation [National Historic Preservation Act of 1966, particularly sections 106 & 110; 36 CFR 800]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves rehabilitation and repair but not acquisition, demolition, disposition, ground disturbance or new construction.</p> <p>The applicant proposes to rehabilitate the five apartments of a three-story building and to abandon the basement, which is below Base Flood Elevation, by filling it with approximately 222 cubic yards of engineered fill. Based on historical Sanborn fire insurance maps and historic aerial imagery, the building appears to have been constructed between 1921 and 1933 (see SRP0043415_BuildDate). The proposed undertaking has been reviewed by a Secretary of Interior-qualified historic preservation professional, archeologist Christopher L. Borstel, Ph.D., RPA. The building is situated in a Historic Properties Exemption Zone (Green Zone) [see SRP0043415_HistoricPreservationMap] identified by a joint FEMA-Historic Preservation Office (HPO) windshield survey, with formal HPO concurrence on 2/7/2013 (HPO Project No. 13-0424-1, Atlantic City, NJ). No further review for potential architectural resource issues is required pursuant to Programmatic Agreement (PA) Tier II Allowance VII.A.2. The property, is situated on Absecon Island, a barrier island, at 0.0429 acre has an area of less than 5 acres, and is not situated within any documented or potential area of archeological sensitivity or known archeological site. No further review for potential archeological resource issues is required pursuant to PA Tier II Allowance I. The application is therefore in compliance with Section 106 of the National Historic Preservation Act (NHPA) and related laws and regulations.</p>
11. Noise Abatement and Control [Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR 51B]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. It does not involve any of the applicable activities: acquisition, conversion, or new construction for residential or other noise-sensitive developments such as hospitals, nursing homes, day care, community centers, etc. and does not involve reconstruction or rehabilitation projects where residential density is being increased.</p> <p>Per HUD directive, 24 CFR Part 51B is not applicable to a disaster recovery program, including rehabilitation and mitigation that meets the requirements for exclusion in 24 CFR 51.101(a) (3). The regulation states that HUD noise policy does not apply to "assistance that has the effect of restoring facilities substantially as they existed prior to the disaster." The proposed rehabilitation of the residential structure without increasing the existing footprint would restore housing substantially as it existed prior to Superstorm Sandy.</p>
12. Sole Source Aquifers [Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR 149]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. It does not involve any of the applicable activities: acquisition of undeveloped land, change of land use, or new construction.</p> <p>Review of the NJDEP's HUD Environmental Review Tool indicated that the proposed project is located in an area of a sole source aquifer. The New Jersey Coastal Plain aquifer system underlies the proposed project site (see SRP0043415_SoleSourceAquifersMap).</p> <p>A 1996 letter from USEPA to HUD regarding project requiring sole source aquifer review by USEPA (see SRP0043415_USEPASoleSourceAquiferReviewofHUDProjects) states that the following activities would not create a significant hazard to public health and are therefore generally excluded from sole source aquifer review:</p> <ul style="list-style-type: none"> • in urbanized areas, single or multi-unit housing developments, community centers and schools that will use existing public water and sewer; and • rehabilitations or improvements to infrastructure already in place, such as water and sewer line replacement, fire hydrant installations, curb cuts, building renovations that do not involve significant expansion, street light and sign installment, road repavement, etc. <p>The proposed action involves the rehabilitation of five residential units (Units 1, 2, 3, 4 and 5) within a multifamily structure (5 or more units). The building contains a total of 5 units. The proposed project would fall under the exclusion of "single or multi-unit housing developments, community centers and schools that will use existing public water and sewer" and "building renovations that do not involve significant expansion." The proposed project will be serviced by existing water and sewer systems operated by the Atlantic City Municipal Utilities Authority and the City of Atlantic City, respectively.</p>
13. Wetlands Protection [24 CFR 55, Executive Order 11990, particularly sections 2 & 5]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. It does not involve any of the applicable activities: acquisition of undeveloped land, change of land use, new construction, or reconstruction on an expanded building footprint.</p> <p>A review of the NJDEP HUD Environmental Review Tool indicated that no coastal or freshwater wetlands are present on or adjacent to the proposed project site (see SRP0043415_WetlandsProtection Map).</p> <p>As the proposed project involves rehabilitation of five residential units within a multifamily structure (5 or more units) without elevation, no land disturbance will occur; therefore, a permit determination consultation with DLUR was not required.</p>
14. Wild and Scenic Rivers [Wild and Scenic Rivers Act of 1968, particularly section 7(b) & (c); 36 CFR 297]	<input checked="" type="radio"/> A <input type="radio"/> B	<p>The proposed project is in compliance. Of the applicable activities, it involves major rehabilitation but does not involve acquisition of undeveloped land, change in land use, or new construction.</p> <p>New Jersey has 262.7 river miles designated as segments of the National Wild and Scenic Rivers System, including portions of the Delaware River, Great Egg Harbor River, Maurice River, and Musconetcong River. Designated rivers also include specific segments of tributaries to these rivers as referenced in the Act. The nearest Wild and Scenic River, the Great Egg Harbor River, is located approximately 7 miles to the west of the proposed project site (see SRP0043415_WildandScenicRiversMap). The project is not located within ¼ mile of a Wild and Scenic River stream bank or a one-mile radius of a designated Wild and Scenic River; therefore, the proposed project would not affect Wild and Scenic Rivers.</p>

24 CFR 58.6 CHECKLIST [24 CFR 50.4, 24 CFR 58.6]

1. AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES NOTIFICATION [24 CFR Part 51.303(a)(3), D]

Does the project involve the sale or acquisition of property located within a Civil Airport Runway Clear Zone or a Military Airfield Clear Zone?

☒ **No.** Cite or attach Source Documentation: [Project complies with 24 CFR 51.303(a)(3)]

The project site is not within any runway protection zones (formerly called runway clear zones) at airports subject to 24 CFR 58.6 or clear zones at military airfields subject to 24 CFR 58.6. Documentation supporting this finding is presented as SRP0043415_AirportHazardsMap.

☐ **Yes.** Notice must be provided to the buyer. The notice must advise the buyer that the property is in a Runway Clear Zone or Clear Zone, what the implications of such a location are, and that there is a possibility that the property may, at a later date, be acquired by the airport operator. The buyer must sign a statement acknowledging receipt of this information, and a copy of the signed notice must be maintained in the ERR.

2. COASTAL BARRIERS RESOURCES ACT [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)]

Is the project located in a coastal barrier resource area?

☒ **No.** Cite or attach Source Documentation: [Proceed with Project]

The nine designated units of the Coastal Barrier Resources System in New Jersey are uninhabited. The 12 "otherwise protected areas" associated with the Coastal Barrier Resources System in New Jersey are also uninhabited. The proposed project activities will not occur on designated coastal barriers or in "otherwise protected areas," and the proposed project would have no impact on coastal barrier resources. Documentation supporting this finding is presented as SRP0043415_USFWSCoastalBarriersResourcesMap.

☐ **Yes.** Federal assistance may not be used in such an area.

3. FLOOD DISASTER PROTECTION ACT [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (42 USC 4001-4128 and 42 USC 5154a)]

Does the project involve acquisition, construction, or rehabilitation of structures located in a FEMA-identified Special Flood Hazard Area (SFHA)?

☐ **No.** Cite or attach Source Documentation: [Proceed with Project]

☒ **Yes.** Cite or attach Source Documentation:

The presence of a Special Flood Hazard Area (100-year floodplain, zones A or V) was determined by using NJDEP's HUD Environmental Review Tool. It has been determined that the entire proposed action is located in a 100-year floodplain, i.e., zone AE, with the FEMA Preliminary FIRMs layer applied. The FEMA Preliminary FIRMs layer is the first "best available information" in the screening tool. Documentation supporting this finding is presented as SRP0043415_FloodplainManagementMap. Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required.

Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒ **Yes. Flood Insurance under the National Flood Insurance Program must be obtained.** If HUD assistance is provided as a grant, insurance must be maintained for the economic life of the project and in the amount of the total project cost (or up to the maximum allowable coverage, whichever is less). If HUD assistance is provided as a loan, insurance must be maintained for the term of the loan and in the amount of the loan (or up to the maximum allowable coverage, whichever is less). A copy of the flood insurance policy declaration must be kept on file in the ERR.

☐ **No. Federal assistance may not be used in the Special Flood Hazard Area.**

☐ **N/A**

Summary of Findings and Conclusions

Field Inspection (Date and completed by):

Field inspection conducted on August 3, 2015, by Beth Williams, Tetra Tech (see SRP0043415_FieldInspectionReport and SRP0043415_Photolog).

Summary Statement of Findings and Conclusions:

Based upon completion of this environmental review of the proposed project, there will be no significant changes to existing environmental conditions across the impact categories implemented by HUD in response to the National Environmental Policy Act of 1969.

Required Mitigation and Project Modification Measures: [24 CFR 58.40(d), 40 CFR 1505.2(c), 40 CFR 1508.20]

(Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.)

The following mitigation measures are required as conditions for approval of the project:

General

- 1. Acquire all required federal, state and local permits prior to commencement of construction and comply with all permit conditions.*
- 2. If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for reevaluation under the National Environmental Policy Act.*

Air Quality

- 3. Use water or chemical dust suppressant in exposed areas to control dust.*
- 4. Cover the load compartments of trucks hauling dust-generating materials.*
- 5. Reduce vehicle speed on non-paved areas and keep paved areas clean.*
- 6. Retrofit older equipment with pollution controls.*
- 7. Establish and follow specified procedures for managing contaminated materials discovered or generated during construction.*
- 8. Employ spill mitigation measures immediately upon a spill of fuel or other hazardous material.*
- 9. Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c). Such equipment includes, but is not limited to, the following:*
 - a. Any commercial fuel combustion equipment rated with a maximum heat input of 1,000,000 British Thermal Units per hour or greater to the burning chamber (N.J.A.C. 7:27-8.2(c)1);*
 - b. Any stationary storage tank for volatile organic compounds with a capacity of 2,000 gallons and a vapor pressure of 0.02 pounds per square inch or greater (N.J.A.C. 7:27-8.2(c)9);*
 - c. Any tank, reservoir, container, or bin with capacity in excess of 2,000 cubic feet used for storage of solid particles (N.J.A.C. 7:27-8.2(c)10); and*
 - d. Any stationary reciprocating engine with a maximum rated power output of 37 kW or greater, used for generating electricity, not including emergency generators (N.J.A.C. 7:27-8.2(c) 21).*
- 10. Minimize idling and ensure that all on-road vehicles and non-road construction equipment operated at or visiting the project site comply with the applicable smoke and "3-minute idling" limits (N.J.A.C. 7:27-14.3, 14.4, 15.3 and 15.8).*
- 11. Ensure that all diesel on-road vehicles and non-road construction equipment used on or visiting the project site use ultra-low sulfur fuel (less than 15 ppm sulfur) in accordance with the federal Non-road Diesel Rule (40 CFR Parts 9, 69, 80, 86, 89, 94, 1039, 1051, 1065, 1068).*
- 12. Operate, if possible, newer on-road diesel vehicles and non-road construction equipment equipped with tier 4 engines, or equipment equipped with an exhaust retrofit device.*

Floodplain Management and Flood Insurance

- 13. Before any work commences, the height of the first floor must be measured. If the measurement determines that the first floor is not 1 foot above the Base Flood Elevation, then actual elevation is needed (rather than just filling the basement), and additional environmental review would be required.*
- 14. No funding will be provided to any person who previously received federal flood disaster assistance conditioned on obtaining and maintaining flood insurance, but failed to obtain and maintain the insurance [24 CFR 58.6(b)].*

Hazardous Materials

- 15. All activities must comply with applicable federal, state, and local laws and regulations regarding asbestos, including but not limited to the following:*
 - National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145*

- *National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150*
- *NJAC 7:26-2.12—Generator requirements for disposal of asbestos containing waste materials*
- *New Jersey Asbestos Control and Licensing Act, N.J.S.A. 34:5A-32 et seq.*

16. *Applicant must comply with all laws and regulations concerning the proper handling, removal and disposal of hazardous materials (e.g. asbestos and lead-based paint) or household waste (e.g. construction and demolition debris, pesticides/herbicides, white goods).*

17. *All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to HUD's lead-based paint regulations in 24 CFR Part 35 Subparts B, H, and J.*

18. *All residential structures must be free of mold attributable to Superstorm Sandy.*

CERTIFICATIONS

Matt Adelson, TetraTech

2015-09-21 19:04:59

Preparer Agency and Name

Completion Date

RE Certifying Officer Name

RE Certifying Officer Signature

RE CO Signature Date