

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	10/22/2024	
Media Program:	Toxics Substances Control Act (TSCA)	
Regulatory Program(s)	Renovation, Repair and Painting (RRP) and 1018 Disclosure	
Company Name:	Hunt Military Community (HMC)	
Facility Name:	Randolph Family Housing	
Facility Physical Location:	205 New B Street East	
(city, state, zip code)	Universal City, Texas, 78148	
Mailing address:	205 New B Street East	
(city, state, zip code)	Universal City, Texas, 78148	
County/Parish:	Bexar	
Facility Phone Number	803-483-9900	
Facility Contact:	Sam Ezernach	
FRS Number:	NA	
Identification/Permit Number:	NA	
Media Identifier Number:	NA	
NAICS:	53131	
SIC:	6531	
Personnel participating in inspection:		
Stan Lancaster	EPA Region 6	Inspection Officer
Angela Hays	EPA Region 6	Inspection Officer
Kiera Hancock	EPA Region 6	Inspection Officer
Andrea Price	EPA OECA HQ	Inspection Officer
Sam Ezernach	Randolph Family Housing	Manager
Patricia Zauala Beltran	Randolph Family Housing	Assistant Manager
Justin Tran	Hunt Military Communities	Community Director
Brandon Taylor	Hunt Military Communities	Maintenance Director
EPA Lead Inspector Signature/Date	ANGELA HAYS  Digitally signed by ANGELA HAYS Date: 2024.12.11 13:47:45 -06'00'	
	Angela Hays	Date
Supervisor Signature/Date	Stuckey, Troy  Digitally signed by Stuckey, Troy Date: 2024.12.11 14:53:29 -06'00'	
	Troy Stuckey, Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

To investigate facility for compliance with the Lead Based Paint Renovation, Repair or Painting (RRP) Rule and 1018 Disclosure Rule of Toxic Substances Control Act (TSCA). The inspection was initiated as part of a national initiative to inspect military bases identified to have reported elevated blood lead levels.

FACILITY DESCRIPTION

Randolph Family Housing, located within Joint Base San Antonio, is managed by Hunt Military Communities (Hunt) with 317 historic residences, consisting of 173 single-family homes and 144 duplexes. Hunt offers housing to Active Duty, Retirees, Veterans, Department of Defense Employees, National Guard, Reservists, and other service members. Most leases are a 12-month term. Hunt has been managing the properties at Randolph since 2007.

Section II – OBSERVATIONS

On October 22, 2024, at 10:30 AM, EPA inspectors Angela Hays, Stan Lancaster, Kiera Hancock, and Andrea Price arrived at Hunt Military Communities located at Randolph Air Force Base inside of Joint Base San Antonio. Upon entry, inspectors Hays, Lancaster, Hancock, and Price presented their credentials to Randolph Family Housing Manager, Sam Ezernach, and Assistant Manager, Patricia Zauala Beltran as well as Hunt Military Communities Community Director, Justin Chan and Maintenance Director Brandon Taylor. The inspection team explained the purpose of the inspection. The Notice of Inspection (Form 7740-3) was filled out and a copy provided to Mr. Tran (Appendix 1).

The interview began with discussions of the property types and build dates. The properties are all single-family homes and duplexes with a potential for children under six and pregnant women to occupy. Build dates are all pre-1978. The inspection team requested to review of compliance with the TSCA 1018 disclosure. A total of 30 leases were reviewed to verify lead addendum and receipt of EPA LBP Pamphlet. Randolph Family Housing also gives a copy of the EPA Lead Pamphlet to each tenant in the “Welcome to JBSA Randolph” packet. Leases are typically a 12-month term.

The inspection team then went on to discuss compliance with the TSCA Renovation, Repair and Painting Rule (RRP). The RRP checklist was completed (Appendix 2). Hunt’s management was unaware of Hunt’s Lead Safe Firm Certification Number. Follow up of the number was requested. During the discussion Hunt management stated that typical painting work does not remove existing paint layers. Painting is performed by painting over the existing layer. If work is needed that will disturb lead-based paint, Hunt hires RRP vendors. Most work performed by Hunt consists of plumbing and HVAC. The Hunt workers at Randolph consist of seven technicians, one community director, one maintenance manager and one

maintenance director. EPA inspectors requested a copy of the standard operating procedures of how LBP is managed and the Contractor names, contact information, certifications, and assigned renovators used for LBP RRP work for the past five years.

The inspection team then drove the residential areas within Randolph to look for active RRP work. EPA was provided maps of Randolph Family Housing (Appendix 3). No active work was being performed at the time of site visit.

The inspectors conducted a closing conference and discussed the areas of concern found. The inspection team went over a list of requested documents and supplied lead-based paint education materials to the facility. The inspection concluded at approximately 12:00 PM.

Section III – AREAS OF CONCERN

Hunt Military Communities at Randolph does not appear to have a Lead Safe Firm Certification.

Section IV – FOLLOW UP

Documentation of the following information was requested by 10/29/2024. Currently some of the documentation has been submitted to EPA and is under review. The remainder of the requested information submission has been extended to 12/13/2024.

- 1) Hunt Military Communities Randolph Lead Safe Firm Certification number.
- 2) List of lead contractors used for RRP in the past 5 years (Or since Hunt has managed property) including;
 - a. Firm Certification Numbers
 - b. Training Certifications
 - c. Contact information.
- 3) Ownership of Housing between Hunt and Randolph
- 2) 2008 Lead based paint inspection
- 3) 2011 (or most recent) maintenance SOP
- 4) 2025 Environmental Baseline Survey
- 5) Past 90 Days of RRP Work Orders

Section V – APPENDIX

Appendix 1 – Notice of Inspection (Form 7740-3)

Appendix 2 – Lead RRP Compliance Checklist

Appendix 3 - Maps of Randolph Community

Appendix 4 - Receipt for Samples and Documents (Form 7740-1)

Appendix 1

Notice of Inspection (Form 7740-3)

United States ENVIRONMENTAL PROTECTION AGENCY Washington, DC 20460			
Notice of Inspection Office of Enforcement and Compliance Assurance			
1. Investigation Identification			3. Facility Name
Date 10/22/2024	Inspection Number 1-1	Daily Seq. Number 1	Hunt Military Communities - Randolph Family Housing
2. Inspector's Address 1201 Elm Street, Dallas, Texas 75270			4. Facility Address 205 New B St E, Universal City, Texas, 78150
For Internal EPA Use. Copies may be provided to the recipient as acknowledgment of this notice.			
Reason for Inspection Under the authority of Section 11 of the Toxic Substances Control Act			
For the purpose of inspecting (including taking samples, photographs, statements and other inspection activities) an establishment, facility or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, control and facilities) and any conveyances being used to transport chemical substance, mixtures or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures or articles, within, or associated with, such premise or conveyance have been complied with.			
☒ In addition, this inspection extends to (check appropriate blocks):			
☐ A. Financial Data		☐ D. Personnel Data	
☐ B. Sales Data		☐ E. Research Data	
☐ C. Pricing Data			
The nature and extent of inspection of such data specified in A through E above is as follows:			
Inspector's Signature Angele Hays		Recipient's Signature Justin Tran	
Name Angele Hays		Name Justin Tran	
Title Inspector		Title Community Director	
Date 10/22/24		Date 10/22/24	

EPA Form 7740-3 (Rev. 2/16)

Save Form Print Form

1-Inspector Copy 2-Facility Copy

Appendix 2

Lead RRP Compliance Checklist

9:31 = on Visitor center
9:40 = meet
10:27 = entry on base
10:40 = opening begins
11:10 = end opening conference
11:53 = end tour

 U.S. EPA	Lead Renovation/Repair/Painting Compliance
	Checklist - Renovators
	US ENVIRONMENTAL PROTECTION AGENCY
	REGION 6, DALLAS, TX 75202
	TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION

Renovation Firms & Renovators Inspection Checklist		
EPA Inspector Name	Angela Hays, Stan Lancaster, Kiera Hancock, Andrea Price	
EPA Inspector Telephone		
EPA Inspector Email		
Inspection Date	10/22/2024	
Inspection Type:	Lead-Based Paint - RRP & 1018	
Inspection Location	Randolph AFB	
Firm Information		
Name	Hunt Military Communities - Randolph Family Housing	
Address	205 New B St E, Universal City, TX 78150	
Contact Name		
Contact Telephone		
Contact Email		
Manager Name		
Manager Telephone		
Manager Email		
EPA Firm Certification Number		
Nature/Description of Work:		
Sam Ezernach = ^{Randolph} Housing Manager = samuel.ezernach.1@us.af.mil Justin Tran - Community Director = Justin.tran@huntcommunities.com (since May) Brenden Taylor - ^{director} Maintenance = Brenden.Taylor@huntcommunities.com (since June) - Patricia Zavala Beltran Patricia.Zavala-Beltran@us.af.mil		
OPENING CONFERENCE		
	Y-N-N/A	Comments
Introduction & Purpose	Y	
Permission to enter granted	Y	
Permission to enter document signed	Y	
Facility/operator provided copy of entry document	Y	
Copy of Lead Based Paint Pamphlet provided	Y	

Housing
manag.
ass.

COMPANY NAME: Hunt Randolph



U.S. EPA

Lead Renovation/Repair/Painting Compliance

Checklist - Renovators

US ENVIRONMENTAL PROTECTION AGENCY

REGION 6, DALLAS, TX 75202

TOXIC SUBSTANCES CONTROL ACT

TITLE IV-LEAD HAZARD REDUCTION

Comments/Information gathered:

Did the company cooperate and provide requested documents?

Is the company a licensed real estate brokerage firm? If Yes, what is their license number?

Does the company manage/sale/renovate target housing? If yes, how many?

Are there children under the age of 6 living in these properties? Under the age of 18? Pregnant women?

Yes

If managing properties, has any renovations been performed on these properties in the past 5 years? Was list provided? 123 144

Circle homes and duplex homes (317 total units). All homes pr-78. Hunt Manager since approximately 2002. Occupied homes: receive call from tenant. Observe. Contact RRP vendor. ~~RRP~~ Contractor does all work. No lead ^{residence} certification at ~~first~~ ^{hand}. Almost all or all ^{with some} certified for RRP work. Unknown on lead from certification. General maintenance conducted by Hunt (electrical, HVAC, plumbing). 2 technicians, 1 coord. coordinate, 2 maintenance manager & minorer director. 271-275 houses occupies a lot of time for turning houses, most major work is contracted out, lease typically 12 months. Government side gives over lead information with tenants as well. ~~Randolph~~ can house? 30 leave reviewed for lead addendum and pamphlet. Discussion in 2023. Now use standardized electronic form across all military homes. This include addendum and pamphlet and communications. Another pamphlet is provided in welcome to ²⁰²⁴ Randolph folder. Leaves reviewed Aug 2019 to 2022 ~~th~~ 2023. For RRP work, contractor keeps record of pamphlet provided. Randolph utilized approx. 3-4 contractors. Follow-up info requested by 29th.

Inspector:

6ECDST

US Environmental Protection Agency Region 6

1201 Elm Street

Dallas, TX 75207

- Requested 30 leaves
- LPP pamphlet w/ leaves
- List of contacts
 - ↳ certification
 - ↳ phone
 - ↳ contact info

Copy of inspection checklist and on-site report sent to:

Print Name: _____

Email: _____

Date _____

Page 2 of 21

COMPANY NAME:

Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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INFORMATION DISTRIBUTION REQUIREMENTS			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.84(a)(1)	Renovation in Dwelling Unit: Did the renovator/property owner/property manager provide the owner of the unit with the EPA-approved lead hazard information pamphlet?	follow up
	Comments		
2	40 C.F.R. § 745.84(a)(2)	Renovation in Dwelling Unit: Did the renovator/property owner/property manager provide the adult occupant of the unit (if occupant is not the owner) with the EPA-approved lead hazard information pamphlet?	follow up
	Comments		
3	40 C.F.R. § 745.84(b)(1)	Renovation in Common Area: Did the renovator provide the property manager/owner of the multi-family housing with the EPA-approved lead hazard information/pamphlet and/or to post informational signs?	multifamily N/A
	Comments		
4	40 C.F.R. § 745.84(b)(2)	Renovation in Common Area: Did the renovator/property manager/property owner notify in writing, or ensure written notification of, each unit of the multi-family housing and make the pamphlet available upon request prior to the start of the renovation, and/or post informational signs?	multifamily N/A
	Comments		
5	40 C.F.R. § 745.84(c)(1)(i)	Renovation in Child-Occupied Facility: Did the renovator/property manager provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet?	Child facility N/A
	Comments		
6	40 C.F.R. § 745.84(c)(1)(ii)	Renovation in Child-Occupied Facility: Did the renovator/property manager/property owner provide an adult representative of the child occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility?	Child facility N/A
	Comments		
7	40 C.F.R. § 745.84(c)(2)	Renovation in Child-Occupied Facility: Did the renovator/property manager/property owner provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation	Child facility N/A

Page 3 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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		and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians?	
	Comments		
8	40 C.F.R. § 745.85 (1)	All Renovations: Did the renovator post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until the renovation and the post-renovation cleaning verification have been completed?	Follow up
	Comments		
TEST KITS			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.88	All Renovations: Did the renovator/firm use an EPA approved dust test kit when determining the presence of lead, where the test kit provided an accurate result for the presence of lead?	Follow up
	Comments		
FAILURE TO ALLOW ACCESS TO RECORDS OR REFUSAL OF AN INSPECTION			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.87(c)	All Renovations: Did the renovator/property owner/property manager refuse to permit entry or inspection? Failure or refusal to permit entry or inspection is also a violation of TSCA §15 and TSCA §409.	N/A
	Comments		
FAILURE TO ESTABLISH AND MAINTAIN RECORDS, FAILURE OR REFUSAL TO MAKE RECORDS AVAILABLE			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.237	All Renovations: Did the renovator/firm/property owner/property manager fail or refusal to establish and maintain records, or to make available such records? Such failure or refusal is a violation of TSCA § 409.	Follow up
	Comments		

Page 4 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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ACKNOWLEDGEMENT AND CERTIFICATION STATEMENT REQUIREMENTS (RENOVATION PAMPHLET)			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.84(a)(1)(i) 40 C.F.R. § 745.84(a)(1)	Renovation in Dwelling Unit: Did the renovator/firm/property manager obtain, from the owner , a written acknowledgment that the owner had received the pamphlet, or obtain a certificate of mailing at least 7 days prior to the renovation?	Owner occupied N/A
Comments			
2	40 C.F.R. § 745.84(a)(2) 40 C.F.R. § 745.84(a)(2)(i)	Renovation in Dwelling Unit: Did the renovator/firm/property manager obtain, from the adult occupant , a written acknowledgment that the adult occupant has received the pamphlet, or obtain a certificate of mailing at least 7 days prior to the renovation?	rental Follow up
Comments			
3	40 C.F.R. § 745.84(b)(1) 40 C.F.R. § 745.84(b)(1)(i)	Renovation in Common Area: Did the renovator/firm/property manager obtain, from the owner, a written acknowledgment that the owner has received the pamphlet, or that information signs have been posted, or obtain a certificate of mailing at least 7 days prior to the renovation?	Multi-family Follow up
Comments			
4	40 C.F.R. § 745.84(b)(3)	Renovation in Common Area: Did the renovator/firm/property manager prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and to provide the pamphlet?	Multi-family Follow up
Comments			
5	40 C.F.R. § 745.84(b)(4)	Renovation in Common Area: Did the renovator/firm/property manager notify, in writing, the owners and occupants of the scope, locations or expected starting and ending dates of the planned renovation activities change after the initial notification, before the renovator initiated work beyond that which was described in the original notice?	Multi-family Follow up
Comments			
6	40 C.F.R. § 745.84(c)(1)(i)	Renovation in Child-Occupied Facility: Did the renovator/firm/property manager obtain, from the owner of the building, a written acknowledgment that the owner had received the pamphlet, or obtained a certificate of mailing at least 7 days prior to the renovation?	Child Facility N/A
Comments			

Page 5 of 21

COMPANY NAME:

Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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7	40 C.F.R. § 745.84(c)(1)(ii)	Renovation in Child-Occupied Facility: Did the renovator/firm/property owner/property manager obtain from an adult representative of the child occupied facility, if the operator of the child-occupied facility is not the owner of the building, a written acknowledgment that the operator has received the pamphlet, or obtained a certificate of mailing at least 7 days prior to the renovation?	Child Facility N/A
Comments			
8	40 C.F.R. § 745.84(c)(3)	Renovation in Child-Occupied Facility: Did the renovator/firm/property owner/property manager prepare, sign and date a statement describing the steps performed to notify all parents and guardians of the intended renovation activities and to provide the pamphlet?	Child Facility N/A
Comments			
9	40 C.F.R. § 745.84(d)(1)	All Renovations: Did the renovator/firm/property owner/property manager include a statement recording the owner/occupant's name and acknowledgment of the pamphlet receipt prior to the start of the renovation, the address of the unit undergoing renovation, the signature of the owner or occupant as applicable, and the date of signature?	 Follow up
Comments			
RECORD RETENTION REQUIREMENTS			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.86	All Renovations: Did the renovator/firm/property manager/property owner retain all records necessary to demonstrate compliance with the residential property renovation for a period of 3 years following completion of the renovation activities?	 Follow up
Comments			
2	40 C.F.R. § 745.225 (i)	All Renovations: Did the training program maintain and make available to EPA upon request, records for a period of 3 years and 6 months?	 Follow up
Comments			
3	40 C.F.R. § 745.225, 745.226, or 745.227 & 40 C.F.R. § 745.235 (b)	Target Housing and Child-occupied Facilities: did the renovator/firm/property manager/property owner/training activity fail or refuse to establish, maintain, provide, copy, or permit access to records or reports?	 Follow up

Page 6 of 21

COMPANY NAME: _____

Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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Comments			
CERTIFICATION AND RELATED REQUIREMENTS			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.89(a) pursuant to 40 CFR § 745.81(a)(2)(ii)	All Renovations: Did the renovator/firm that performs, offers or claims to perform renovations or dust sampling for compensation obtain initial certification from EPA? If the firm did not obtain initial certification, then proceed next section.	Follow up
Comments			
2	40 CFR § 745.89(a) & 40 C.F.R. § 745.89(b)(1)(iii)	All Renovations: If initial certification has expired, did the EPA-certified cease renovations or dust sampling upon expiration of certification?	Follow up
Comments			
3	40 C.F.R. § 745.89(b) & 40 C.F.R. § 745.89(c)	All Renovations: Did firm amend certification within 90 days of pertinent information change? Did the firm halt renovations or dust sampling until its certification was amended?	Follow up
Comments			
4	40 C.F.R. § 745.89(d)(1) & 40 C.F.R. § 745.81(a)(2)	All Renovations: Are all individuals performing renovations certified renovators or trained by certified renovators?	Follow up
Comments			
5	40 C.F.R. § 745.89(d)(2) & 40 C.F.R. § 745.81(a)(2)	All Renovations: Is a certified renovator assigned to and available at each renovation?	Follow up
Comments			
6	40 C.F.R. § 745.90(b) or (c) 40 CFR § 745.90(a) 40 C.F.R. § 745.81(a)(3)	All Renovations: Did the certified renovator or dust sampling technician ensure compliance with 745.85 at all renovations to which they were assigned?	Follow up
Comments			

Page 7 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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7	40 CFR § 745.90(b)(7)	All Renovations: Did the renovator or dust sampling technician, performing renovator or dust sampling responsibilities under 40 C.F.R. § 745.90(b) or (c) to maintain and make available copies of their course completion certificate(s) (proof of certification) at the work site?	follow up
Comments			
8	40 C.F.R. § 745.90(c)	All Renovations: Did the dust sampling technician to perform optional dust clearance sampling under § 745.85(c)?	follow up
Comments			
9	40 C.F.R. § 745.81(a)(3)	Target Housing and Child-occupied Facilities: Did the previously EPA-certified individual stop directing renovations if he/she did not obtain recertification under 40 CFR § 745.90(a)(4)?	follow up
Comments			
WORK PRACTICE STANDARDS FOR CONDUCTING RENOVATIONS IF RENOVATIONS DID NOT OCCUR THIS SECTION IS N/A			
	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.85(a)(2)(i)(A)	Interior Renovations: Did the renovation firm remove all objects from the work area, including furniture, rugs, and window coverings, or cover them with plastic sheeting or other impermeable material with all seams and edges taped or otherwise sealed?	N/A
Comments			
2	40 C.F.R. § 745.85(a)(2)(i)(B)	Interior Renovations: Did the renovation firm, before beginning the renovation, close and cover all ducts opening in the work area with taped-down plastic sheeting or other impermeable material?	N/A
Comments			
3	40 C.F.R. § 745.85(a)(2)(i)(C)	Interior Renovations: Did the renovation firm close windows and doors in the work area, cover doors with plastic sheeting or other impermeable material, and/or cover doors used as an entrance to the work area with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area?	N/A
Comments			
4	40 C.F.R. § 745.85(a)(2)(i)(D)	Interior Renovations: Did the renovation firm, before beginning the renovation, cover the floor surface, including installed carpet, with taped-down plastic sheeting or other	N/A

Page 8 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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		impermeable material in the work area 6 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater?	
	Comments		
5	40 C.F.R. § 745.85(a)(2)(i)(E)	Interior Renovations: Did the renovation firm use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris before leaving the work area?	Follow up
	Comments		
6	40 C.F.R. § 745.85(a)(2)(ii)(A)	Exterior Renovations: Did the renovation firm, before beginning the renovation, close all doors and windows within 20 feet of the renovation, close all doors and windows within 20 feet of the renovation on the same floor as the renovation on multi-story buildings, and/or close all doors and windows on all floors below that are the same horizontal distance from the renovation?	Follow up
	Comments		
7	40 C.F.R. § 745.85(a)(2)(ii)(B)	Exterior Renovations: Did the renovation firm, before beginning the renovation, ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting or other impermeable material in a manner that allows workers to pass through while confining dust and debris to the work area?	Follow up
	Comments		
8	40 C.F.R. § 745.85(a)(2)(ii)(C)	Exterior Renovations: Did the renovation firm, before beginning the renovation, cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to collect falling paint debris, whichever is greater, unless the property line prevents 10 feet of such ground covering?	Follow up
	Comments		
9	40 C.F.R. § 745.85(a)(2)(ii)(D)	Exterior Renovations: Did the renovation firm, before beginning the renovations in certain situations, take extra precautions in containing the work area to ensure that dust and debris from the renovation does not contaminate other buildings or other areas of the property or migrate to adjacent properties?	Follow up
	Comments		

Page 9 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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10	40 C.F.R. § 745.85(a)(3)(i)	Prohibited and restricted practices: Did the renovator/firm prohibit the use of open-flame burning or torching of lead-based paint during renovations?	N/A
Comments			
11	40 C.F.R. § 745.85(a)(3)(ii)	Prohibited and restricted practices: Did the renovator/firm prohibit the use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planning, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control?	N/A
Comments			
12	40 C.F.R. § 745.85(a)(3)(iii)	Prohibited and restricted practices: Did the renovator/firm restrict the operating/use of a heat gun on lead-based paint to temperatures below 1100 degrees Fahrenheit?	N/A
Comments			
13	to 40 C.F.R. § 745.85(a)(4)(i)	Waste from renovations: Did the renovator/firm contain waste from renovation activities to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal and/or failure to cover a chute if it is used to remove waste from the work area?	N/A
Comments			
14	40 C.F.R. § 745.85(a)(4)(ii)	Waste from renovations: Did the renovator/firm, at the conclusion of each work day and/or at the conclusion of the renovation, ensure that waste that had been collected from renovation activities was stored under containment, in an enclosure, or behind a barrier that prevents release of dust and debris out of the work area and prevents access to dust and debris?	N/A
Comments			
15	to 40 C.F.R. § 745.85(a)(4)(iii)	Waste from renovations: Did the renovation firm contain the waste to prevent release of dust and debris during the transport of waste from renovation activities?	N/A
Comments			
16	40 C.F.R. § 745.85(a)(5)	Cleaning the work area: Did the renovation firm clean the work area until no dust, debris or residue remained after the renovation had been completed?	N/A
Comments			
17	40 C.F.R. § 745.85(a)(5)(i)(A)	Cleaning the work area: did the renovation firm collect all paint chips and debris and seal the material in a heavy-duty bag without dispersing any of it?	N/A
Comments			

Page 10 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA		Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION	
18	40 C.F.R. § 745.85(a)(5)(i)(B)	Cleaning the work area: Did the renovation firm remove the protective sheeting by misting the sheeting before folding it, folding the dirty side inward, and/or either taping shut to seal or sealing it in heavy-duty bags?	<i>Follow up</i>
	Comments		
19	40 C.F.R. § 745.85(a)(5)(i)(B)	Cleaning the work area: Did the renovation firm keep in place the plastic sheeting used to isolate contaminated rooms from non-contaminated rooms until after the cleaning and removal of other sheeting?	<i>Follow up</i>
	Comments		
20	40 C.F.R. § 745.85(a)(5)(i)(B)	Cleaning the work area: Did the renovation firm dispose of the plastic sheeting, used as occupant protection at the renovation site, as waste?	<i>Follow up</i>
	Comments		
21	40 C.F.R. § 745.85(a)(5)(ii)	Cleaning the work area: Did the renovation firm clean all objects and surfaces in the work area and within 2 feet of the work area, cleaning from higher to lower?	<i>Follow up</i>
	Comments		
22	40 C.F.R. § 745.85(a)(5)(ii)(A)	Cleaning the work area: Did the renovation firm clean walls in the work area, starting at the ceiling and working down to the floor, by either vacuuming with a HEPA vacuum or wiping with a damp cloth?	<i>Follow up</i>
	Comments		
23	40 C.F.R. § 745.85(a)(5)(ii)(B)	Cleaning the work area: Did the renovation firm thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum and/or failure to use a HEPA vacuum equipped with a beater bar when vacuuming carpets and rugs?	<i>Follow up</i>
	Comments		
24	40 C.F.R. § 745.85(a)(5)(ii)(C)	Cleaning the work area: Did the renovation firm to wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth and/or failure to mop uncarpeted floors thoroughly, using a mopping method that keeps the wash water separate from the rinse water, such as the 2-bucket mopping method, or using a wet mopping system?	<i>Follow up</i>
	Comments		
25	40 C.F.R. § 745.85(b)(1)(i)	Standards for post-renovation cleaning verification: Did the renovator perform a visual inspection of the interior work area to determine whether dust, debris or residue is still present, to	<i>Follow up</i>

Page 11 of 21

COMPANY NAME:

Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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		remove dust, debris or residue by re-cleaning if necessary, and/or perform another visual inspection?	
	Comments		
26	40 C.F.R. § 745.85(b)(1)(ii)(A)	Standards for post-renovation cleaning verification: Did the renovator verify that each interior windowsill in the work area has been adequately cleaned using a disposable cleaning cloth(s) compared to the cleaning verification card following the prescribed procedures, pursuant to 40 C.F.R. §745.85 (b)(1)(ii) (A) or failure by a certified renovator to arrange for the collection dust clearance samples as part of optional dust clearance testing?	follow up
	Comments		
27	40 C.F.R. § 745.85(b)(1)(ii)(B)	Standards for post-renovation cleaning verification: Did the renovator fail to verify that each interior floor in the work area has been adequately cleaned using a disposable cleaning cloth(s) compared to the cleaning verification card following the prescribed procedures pursuant to 40 C.F.R. §745.85 (b)(1)(ii) (B) or failure by a certified renovator to arrange for the collection dust clearance samples as part of optional dust clearance testing?	follow up
	Comments		
28	40 C.F.R. § 745.85(b)(1)(iii)	Standards for post-renovation cleaning verification: Did the renovator wait until interior work area passes post-renovation cleaning verification before removing signs?	follow up
	Comments		
29	40 C.F.R. § 745.85(b)(2)	Standards for post-renovation cleaning verification: Did the renovator perform a visual inspection of the exterior work area to determine whether dust, debris or residue is still present, to remove dust, debris or residue by re-cleaning if necessary, and/or perform another visual inspection?	follow up
	Comments		
30	40 C.F.R. § 745.85(b)(2)	Standards for post-renovation cleaning verification: Did the renovator wait until exterior work area passes visual inspection before removing signs?	follow up
	Comments		
31	40 C.F.R. § 745.85(c)	Standards for post-renovation cleaning verification: Did the renovation firm arrange for performance of optional dust clearance testing at the conclusion of the renovation if required to do so by the person contracting for the renovation, a Federal, State, Territorial, Tribal, or local law or regulation?	follow up

Page 12 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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Comments			
32	40 C.F.R. § 745.85(c)(2)	Standards for post-renovation cleaning verification: Did the renovator have the optional dust clearance testing performed by a certified inspector, risk assessor or dust sampling technician at the conclusion of the renovation?	Follow up
Comments			
33	40 C.F.R. § 745.85(c)(3)	Standards for post-renovation cleaning verification: Did the renovation firm re-clean the work area until dust clearance results are below clearance standards?	N/A
Comments			
INSPECTION/RISK ASSESMENT/ABATEMENT WORK PRACTICE STANDARDS APPLICABLE ONLY IF CERTIFIED INSPECTIONS AND ASSESSMENTS OCCURED			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.227(a)(1)	Target Housing and Child-occupied Facilities: Did the renovator/firm perform all lead-based paint activities pursuant to the work practice standards, appropriate requirements, methodologies and clearance levels specified and referenced?	N/A
Comments			
2	40 C.F.R. § 745.227(a)(2)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure lead-based paint activity described by the certified individual as an inspection, lead-hazard screen, risk assessment or abatement, was performed by a certified individual?	N/A
Comments			
3	40 C.F.R. § 745.227(b)(1)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure an inspection was conducted only by a person certified by EPA as an inspector or risk assessor and, if conducted, must be conducted according to the prescribed procedures?	N/A
Comments			
4	40 C.F.R. § 745.227(b)(2)	Target Housing and Child-occupied Facilities: Did the renovator/firm conduct an inspection at select locations according to documented methodologies to be tested for the presence of lead-based paint?	N/A
Comments			
5	40 C.F.R. § 745.227(b)(2)(i)	Target Housing and Child-occupied Facilities: Did the renovator/firm test for lead-based paint each interior and/or	N/A

Page 13 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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		exterior component with a distinct painting history in a residential dwelling and/or child occupied facility?	
	Comments		
6	40 C.F.R. § 745.227(b)(2)(ii)	Target Housing and Child-occupied Facilities: Did the renovator/firm test for lead-based paint each interior and/or exterior component with a distinct painting history in a multi-family dwelling?	Follow up
	Comments		
7	40 C.F.R. § 745.227(b)(3)(i)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that paint sampled for analysis to determine the presence of lead was conducted using documented methodologies which incorporate adequate quality control procedures?	Follow up
	Comments		
8	40 C.F.R. § 745.227(b)(3)(ii)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that all collected paint chip samples were analyzed according to 40 C.F.R. § 745.227(f) to determine if they contain detectable levels of lead that can be quantified numerically?	Follow up
	Comments		
9	40 C.F.R. § 745.227(b)(4)	Target Housing and Child-occupied Facilities: Did the inspector or risk assessor prepare an inspection report that includes the required information?	Follow up
	Comments		
10	40 C.F.R. § 745.227(c)(1)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that a lead hazard screen was conducted only by a person certified by EPA as a risk assessor?	Follow up
	Comments		
11	40 C.F.R. § 745.227(c)(2)(i)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that a lead hazard screen included the collection of background information regarding the physical characteristics of the residential dwelling or child-occupied facility and occupant use patterns that may cause lead-based paint exposure to one or more children age 6 years and under?	Follow up
	Comments		
12	40 C.F.R. § 745.227(c)(2)(ii) (A)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a lead hazard screen includes a visual inspection to determine the presence of deteriorated paint?	Follow up
	Comments		

Page 14 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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13	40 C.F.R. § 745.227(c)(2)(ii) (B)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a lead hazard screen includes a visual inspection to locate at least two dust samples performed according to the prescribed methodologies?	Follow up
	Comments		
14	40 C.F.R. § 745.227(c)(3)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a lead hazard screen includes the collection and analysis of dust samples according to the prescribed methodologies?	Follow up
	Comments		
15	40 C.F.R. § 745.227(c)(4)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a lead hazard screen includes the collection and analysis of paint samples according to the prescribed methodologies?	Follow up
	Comments		
16	40 C.F.R. § 745.227(c)(5)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a risk assessor prepared a lead hazard screen report that includes the required information found in the regulation?	Follow up
	Comments		
17	40 C.F.R. § 745.227(d)(1)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure a risk assessment was conducted only by a person certified by EPA as a risk assessor?	Follow up
	Comments		
18	40 C.F.R. § 745.227(d)(2)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that a risk assessment includes a visual inspection of the residential dwelling or child-occupied facility to locate the existence of deteriorated paint, assess the extent and causes of the deterioration, and other potential lead-based paint hazards?	Follow up
	Comments		
19	40 C.F.R. § 745.227(d)(3)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that a lead hazard screen includes the collection of background information regarding the physical characteristics of the residential dwelling or child-occupied facility and occupant use patterns that may cause lead-based paint exposure to one or more children age 6 years and under?	Follow up
	Comments		

Page 15 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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20	40 C.F.R. § 745.227(d)(4)	Target Housing and Child-occupied Facilities: Did the renovator/firm test for the presence of lead on each surface determined to have a distinct painting history?	follow up
Comments			
21	40 C.F.R. § 745.227(d)(5)	Residential Dwellings: Did the renovator/firm collect and analyze for lead concentration dust samples (either composite or single-surface samples) from the interior window sill(s) and floor(s) in all living areas where one or more children, age 6 and under, are most likely to come into contact with dust?	follow up
Comments			
22	40 C.F.R. § 745.227(d)(6)	Multi-family Dwellings and Child-occupied Facilities: Did the renovator/firm collect and analyze interior window sill and floor dust samples (either composite or single-surface samples) for lead concentration from the prescribed locations?	follow up
Comments			
23	40 C.F.R. § 745.227(d)(7)	Child-occupied Facilities: Did the renovator/firm collect and analyze interior window sill and floor dust samples (either composite or single-surface samples) for lead concentration in each room, hallway or stairwell utilized by one or more children, age 6 and under, and in other common areas in the child occupied facility?	follow up
Comments			
24	40 C.F.R. § 745.227(d)(8)	Target Housing and Child-occupied Facilities: Did the renovator/firm collect and analyze soil samples for lead concentrations in the prescribed locations?	follow up
Comments			
25	40 C.F.R. § 745.227(d)(9)	Target Housing and Child-occupied Facilities: Did the renovator/firm conduct all paint, dust, or soil sampling or testing using documented methodologies that incorporate adequate quality control procedures?	follow up
Comments			
26	40 C.F.R. § 745.227(d)(10)	Target Housing and Child-occupied Facilities: Did the renovator/firm analyze any collected paint chip, dust, or soil samples according to 40 C.F.R. § 745.227(f) to determine if they contain detectable levels of lead that can be quantified numerically?	follow up
Comments			
27	40 C.F.R. § 745.227(d)(11)	Target Housing and Child-occupied Facilities: Did the renovator/firm/risk assessor prepare a risk assessment report that includes the required information?	follow up

Page 16 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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	Comments	
28	40 C.F.R. § 745.227(e)(1)	Target Housing and Child-occupied Facilities: Did the renovator/firm ensure that an abatement is conducted only by a person certified by EPA, and, if conducted, is conducted according to the prescribed procedures? <i>N/A</i>
29	40 C.F.R. § 745.227(e)(2)	Target Housing and Child-occupied Facilities: Did the firm ensure a certified renovator was available to be onsite for each abatement project during all work site preparation, during the post-abatement cleanup of work areas, and to be onsite at other times during the abatement or available by telephone, pager or answering service and able to be present at the work site in no more than 2 hours? <i>N/A</i>
30	40 C.F.R. § 745.227(e)(3)	Target Housing and Child-occupied Facilities: Did the firm ensure a certified renovator was available to direct activities and ensure that all abatement activities are conducted according to the requirements of 40 C.F.R. § 745.227(e) and all other Federal, State and local requirements? <i>N/A</i>
31	40 C.F.R. § 745.227(e)(4)(i-v)	Target Housing and Child-occupied Facilities: Did the renovation firm notify EPA of lead-based paint abatement activities or to update notification as prescribed and by the designated deadline? <i>N/A</i>
32	40 C.F.R. § 745.227(e)(4)(vi)	Target Housing and Child-occupied Facilities: Did the renovation firm include the designated information in each notification? <i>Follow up</i>
33	40 C.F.R. § 745.227(e)(4)(vii)	Target Housing and Child-occupied Facilities: Did the certified firm accomplish written or electronic notification via one of the prescribed methods? <i>Follow up</i>
34	40 C.F.R. § 745.227(e)(4)(viii)	Target Housing and Child-occupied Facilities: Did the renovation firm begin lead-based paint abatement activities on the date and at the location specified in either the original or updated Notification? <i>N/A</i>
35	40 C.F.R. § 745.227(e)(4)(ix)	Target Housing and Child-occupied Facilities: Did the certified renovation firm or individual notify EPA before <i>Follow up</i>

Page 17 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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		engaging in lead-based paint abatement activities defined in 40 C.F.R. § 745.223?	
	Comments		
36	40 C.F.R. § 745.227(e)(5)	Target Housing and Child-occupied Facilities: Did the certified renovation firm or individual develop a written occupant protection plan for all abatement projects and in accordance with the prescribed procedures?	Follow up
	Comments		
37	40 C.F.R. § 745.227(e)(6)(i)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator prohibit the use of open-flame burning or torching of lead-based paint during abatement activities?	N/A
	Comments		
38	40 C.F.R. § 745.227(e)(6)(ii)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator prohibit the use of machines that remove lead-based paint through sanding, grinding, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control which removes particles of 0.3 microns or larger from the air at 99.97 percent or greater efficiency?	N/A
	Comments		
39	40 C.F.R. § 745.227(e)(6)(iii)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator prohibit the dry scraping of lead-based paint unless it is used in conjunction with heat guns or around electrical outlets or when treating defective paint spots totaling no more than 6 square feet in any one room, hallway, or stairwell or totaling no more than 20 square feet on exterior surfaces?	N/A
	Comments		
40	40 C.F.R. § 745.227(e)(6)(iv)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator restrict the operating of a heat gun on lead-based paint at temperatures below 1100 degrees Fahrenheit?	N/A
	Comments		
41	40 C.F.R. § 745.227(e)(7)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator conduct soil abatement, when necessary, according to the prescribed methods?	Follow up
	Comments		
42	to 40 C.F.R. § 745.227(e)(8)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator have a certified inspector or risk assessor perform the post-abatement clearance procedures?	N/A
	Comments		

Page 18 of 21

COMPANY NAME: Hunt - Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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43	40 C.F.R. § 745.227(e)(8)(i)	Target Housing and Child-occupied Facilities: Did the certified firm have an inspector or risk assessor to perform a visual inspection after abatement to determine if deteriorated painted surfaces and/or visible amounts of dust, debris or residue are still present and to remove any hazards that still remain?	<i>follow up</i>
	Comments		
44	40 C.F.R. § 745.227(e)(8)(ii)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator wait until the required visual inspection and any necessary post-abatement cleanups were completed before performing clearance sampling for lead in dust?	<i>follow up</i>
	Comments		
45	40 C.F.R. § 745.227(e)(8)(iii)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator take dust samples for clearance purposes using documented methodologies that incorporate adequate quality control procedures?	<i>follow up</i>
	Comments		
46	40 C.F.R. § 745.227(e)(8)(iv)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator wait a minimum of 1-hour after completion of final post-abatement cleanup activities to collect dust samples for clearance purposes?	<i>follow up</i>
	Comments		
47	40 C.F.R. § 745.227(e)(8)(v) (A)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator collect the required dust samples from the prescribed surfaces in the designated rooms after conducting an abatement with containment between abated and unabated areas?	<i>follow up</i>
	Comments		
48	40 C.F.R. § 745.227(e)(8)(v) (B)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator collect the required dust samples from the prescribed surfaces in the designated rooms after conducting an abatement with no containment?	<i>follow up</i>
	Comments		
49	40 C.F.R. § 745.227(e)(8)(v) (C)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator conduct a visual inspection and clean horizontal, outdoor surfaces of visible dust and debris, perform visual inspection for paint chips on the dripline and remove and properly dispose of any paint chips found following an exterior paint abatement?	<i>follow up</i>
	Comments		

Page 19 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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50	40 C.F.R. § 745.227(e)(8)(vi)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator select the rooms, hallways or stairwells for sampling according to documented methodologies?	Follow up
	Comments		
51	40 C.F.R. § 745.227(e)(8)(vii)	Target Housing and Child-occupied Facilities: Did the certified inspector or risk assessor compare the residual lead level from dust samples with clearance levels to determine if level exceeds the applicable clearance level?	Follow up
	Comments		
52	40 C.F.R. § 745.227(e)(8)(vii)	Target Housing and Child-occupied Facilities: Did a certified inspector or risk assessor re-clean and retest the surface of components that were determined to have failed clearance testing after abatement?	Follow up
	Comments		
53	40 C.F.R. § 745.227(e)(8)(vii i)	Target Housing and Child-occupied Facilities: Did the certified firm/renovator use the standard clearance levels for lead in dust of 40 µg/ft ² for floors, 250 µg/ft ² for interior window sills, and 400 µg/ft ² for window troughs to determine if a level in a sample exceeds the applicable clearance level?	Follow up
	Comments		
54	40 C.F.R. § 745.227(e)(9)	Target Housing and Child-occupied Facilities: Did a certified firm/renovator perform random sampling in a multifamily dwelling with similarly constructed and maintained residential dwellings according to the prescribed methods?	Follow up
	Comments		
55	40 C.F.R. § 745.227(e)(10)	Target Housing and Child-occupied Facilities: Did a certified renovator/supervisor or project designer prepare an abatement report that includes the required information?	Follow up
	Comments		
56	40 C.F.R. § 745.227(f)	Target Housing and Child-occupied Facilities: Did a certified renovator ensure that all paint chip, dust, or soil samples obtained are collected by a certified risk assessor or paint inspector and analyzed by an EPA recognized laboratory?	Follow up
	Comments		
57	40 C.F.R. § 745.227(g)	Target Housing and Child-occupied Facilities: Did the certified renovator limit composite dust sampling to only those situations specified?	Follow up
	Comments		

Page 20 of 21

COMPANY NAME: Hunt Randolph

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist - Renovators US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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58	40 C.F.R. § 745.227(h)	Target Housing and Child-occupied Facilities: Did the certified renovator make a determination on the presence of lead-based paint?	<i>Follow up</i>
Comments			
59	40 CFR § 745.233	Target Housing and Child-occupied Facilities: Is the firm certified performs, offers or claims to perform renovations or dust sampling for compensation to obtain initial certification from EPA, under 40 C.F.R. § 745.226?	<i>Follow up</i>
Comments			
LEAD-BASED PAINT RISK ASSESSMENTS			
#	Reg Ref	Question	Y-N-N/A
1	40 C.F.R. § 745.227(d)(1)	Is the person performing a risk assessment certified by EPA as a risk assessor?	<i>N/A</i>
Comments			
2	40 C.F.R. § 745.227(d)(2)	Did a certified renovator conduct a visual inspection for risk assessment of a child-occupied facility to locate the existence of deteriorated paint, assess extent and causes of deterioration, and other potential lead based paint hazards?	<i>N/A</i>
Comments			

Target Housing

Major = one or more occupants under age 6 and/or pregnant woman

Significant = no information about age of the youngest occupant, or one or more occupants between ages of 6 and 17

Minor = no occupants under age 18

Child Occupied Facility

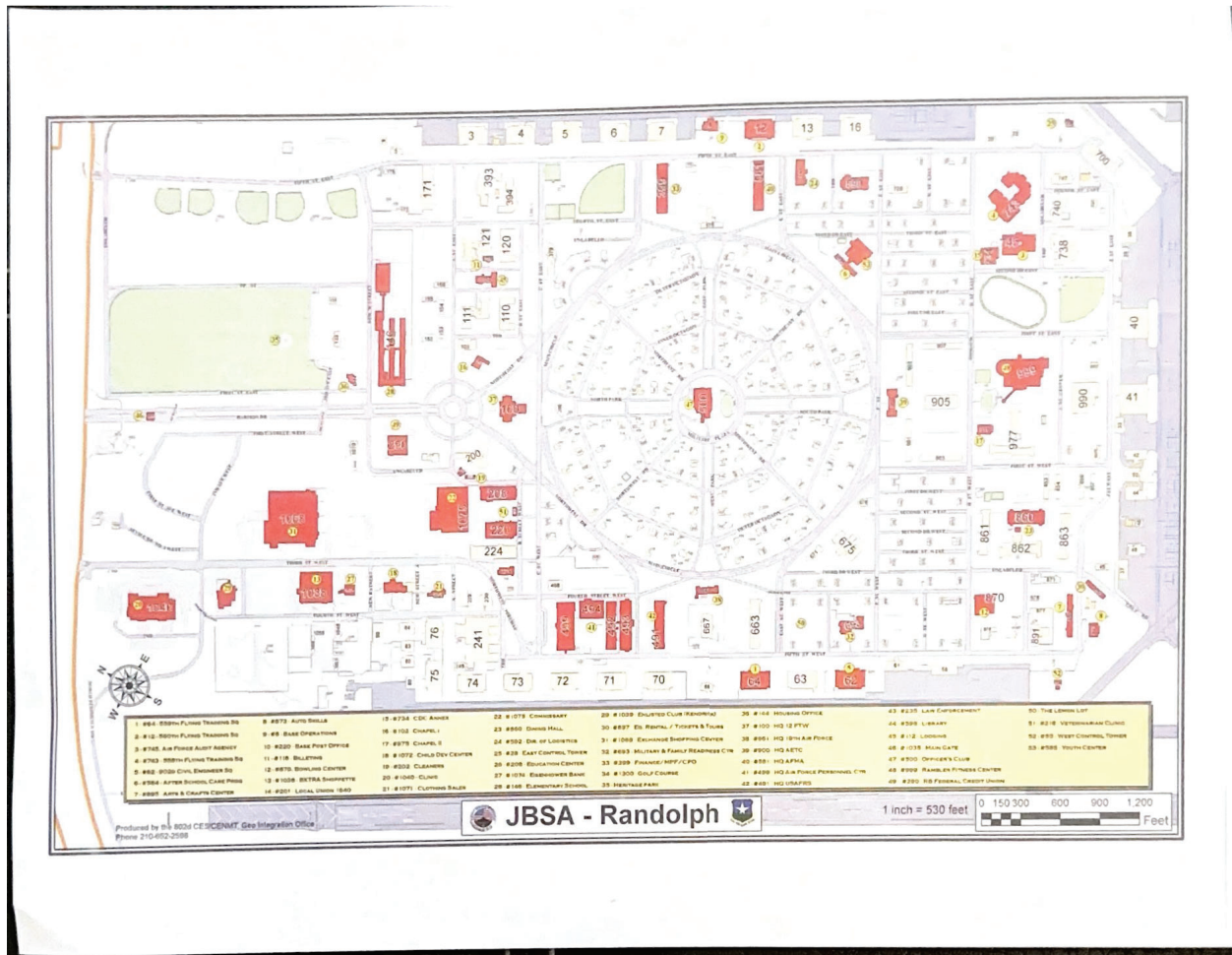
Major = one or more occupants under age 6 (by definition, a child-occupied facility is regularly visited by one or more children under 6)

Minor = renovation activities were completed during a period when children did not access the facility (e.g., as summer vacation) and there is no continuity of enrollment (i.e., the same children are not returning after the break).

COMPANY NAME: Hunt Randolph

Appendix 3

Maps of Community



Appendix 4

Receipt for Samples and Documents (Form 7740-1)

United States ENVIRONMENTAL PROTECTION AGENCY Washington, DC 20460	
Receipt for Samples and Documents Office of Enforcement and Compliance Assurance	
1. Investigation Identification	
Date 10/22/2024	Inspection No. 1-1
Daily Seq. No. 1	2. Company Name Hunt Military Communities - Randolph Family Housing
3. Inspector Address 1201 Elm Street, Dallas, Texas 75270	4. Company Address 205 New B St E, Universal City, Texas 78150
For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.	
Receipt of Document(s) and/or Sample(s) Described is Hereby Acknowledged:	
No.	Description
1	Map of JBSA - Randolph (2 copies)
Optional: Duplicate or Split Samples: Requested and Provided ☐ Not Requested ☐	
Inspector's Signature Angela Hays	Claimant's Signature Justin Tran
Name Angela Hays	Name Justin Tran
Title Inspector	Title Community Director
Date 10/22/24	Date 10/22/24

EPA Form 7740-1 (Rev. 2/16) 1-Inspector Copy 2-Facility Copy