



The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

ONE ASHBURTON PLACE, ROOM 1819
BOSTON, MASSACHUSETTS 02108

A. JOSEPH DeNUCCI
AUDITOR

TEL. (617) 727-6200

NO. 2006-0673-3A

**INDEPENDENT STATE AUDITOR'S REPORT
ON THE PHYSICAL CONDITION
OF STATE-AIDED PUBLIC HOUSING UNITS
AND RESOURCES ALLOCATED FOR THE
OPERATION AND UPKEEP OF THE
HAVERHILL HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005**

**OFFICIAL AUDIT
REPORT
JANUARY 2, 2008**

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In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Haverhill Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A. Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

AUDIT RESULTS

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1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

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DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. Between January 30, 2006 and February 15, 2006, we inspected 36 of the 440 state-aided housing units managed by the Authority and noted 61 instances of noncompliance with Chapter II of the State Sanitary Code, including cracked and moldy bathroom walls; sidewalks, floors, and roofs in need of replacement; health-endangering mold growth in kitchens, bathrooms, exterior walls, and basements; water damage to ceilings; failed thermal break materials in window frames; and rust formation on window lintels. In its response, the Authority indicated that certain of these conditions were intentionally created so that the architect could determine the sources of mold and moisture problems.

2. MODERNIZATION INITIATIVES NOT FUNDED

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On January 23, 2007, in response to our follow-up questions, the Authority indicated that modernization needs still exist for its 667 Elderly developments. Except for a fire alarm

replacement project, DHCD has not funded the Authority's modernization needs. Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, if the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised.

3. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES **10**

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average turnaround time for vacant units was 122 days. Moreover, we found that as of June 30, 2005, there were over 600 applicants on the Authority's waiting list. In its response, the Authority indicated that because modernization funding was not available, kitchens and baths needed to be completely renovated when units were vacated instead of just cleaned and painted, resulting in the excessive turnaround time.

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INTRODUCTION

Background

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Haverhill Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A.

Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties are maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to LHAs for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as the capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

Audit Scope, Objectives, and Methodology

The scope of our audit included an evaluation of management controls over dwelling unit inspections, modernization funds, and maintenance plans. Our review of management controls included those of both the LHAs and DHCD. Our audit scope included an evaluation of the physical condition of the properties managed; the effect if any, that a lack of reserves, operating and modernization funds, and maintenance and repair plans has on the physical condition of the LHAs'

state-aided housing units/projects; and the resulting effect on the LHAs' waiting lists, operating subsidies, and vacant units.

Our audit was conducted in accordance with applicable generally accepted government auditing standards for performance audits and, accordingly, included such audit tests and procedures as we considered necessary.

Our primary objective was to determine whether housing units were maintained in proper condition and in accordance with public health and safety standards (e.g., the State Sanitary Code, state and local building codes, fire codes, and Board of Health regulations) and whether adequate controls were in place and in effect over site-inspection procedures and records. Our objective was to determine whether the inspections conducted were complete, accurate, up-to-date, and in compliance with applicable laws, rules, and regulations. Further, we sought to determine whether management and DHCD were conducting follow-up actions based on the results of site inspections.

Second, we sought to determine whether the LHAs were owed prior-year operating subsidies from DHCD, and whether the untimely receipt of operating subsidies from DHCD may have resulted in housing units not being maintained in proper condition.

Third, in instances where the physical interior/exterior of LHA-managed properties were found to be in a state of disrepair or deteriorating condition, we sought to determine whether an insufficient allocation of operating or modernization funds from DHCD contributed to the present conditions noted and the resulting effect, if any, on the LHA's waiting lists and vacant unit reoccupancy.

To conduct our audit, we first reviewed DHCD's policies and procedures to modernize state-aided LHAs, DHCD subsidy formulas, DHCD inspection standards and guidelines, and LHA responsibilities regarding vacant units.

Second, we sent questionnaires to each LHA in the Commonwealth requesting information on the:

- *Physical condition of its managed units/projects*
- *State program units in management*
- *Off-line units*
- *Waiting lists of applicants*

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- *Listing of modernization projects that have been formally requested from DHCD within the last five years, for which funding was denied*
 - *Amount of funds disbursed, if any, to house tenants in hotels/motels*
 - *Availability of land to build affordable units*
 - *Written plans in place to maintain, repair, and upgrade its existing units*
 - *Frequency of conducting inspections of its units/projects*
 - *Balances, if any, of subsidies owed to the LHA by DHCD*
 - *Condition Assessment Reports (CARS) submitted to DHCD*
 - *LHA concerns, if any, pertaining to DHCD's current modernization process*

The information provided by the LHAs was reviewed and evaluated to assist in the selection of housing authorities to be visited as part of our statewide review.

Third, we reviewed the report entitled “Protecting the Commonwealth’s Investment – Securing the Future of State-Aided Public Housing.” The report, funded through the Harvard Housing Innovations Program by the Office of Government, Community and Public Affairs, in partnership with the Citizens Housing and Planning Association, assessed the Commonwealth’s portfolio of public housing, documented the state inventory capital needs, proposed strategies to aid in its preservation, and made recommendations regarding the level of funding and the administrative and statutory changes necessary to preserve state public housing.

Fourth, we attended the Joint Legislative Committee on Housing’s public hearings on March 7, 2005 and February 27, 2006 on the “State of State Public Housing;” interviewed officials from LHAs, the Massachusetts Chapter of the National Association of Housing and Redevelopment Officials and DHCD; and reviewed various local media coverage regarding the condition of certain local public housing stock.

To determine whether state-aided programs were maintained in proper condition and safety standards, we (a) observed the physical condition of units/projects by conducting inspections of selected units/projects to ensure that the units and buildings met the necessary minimum standards set forth in the State Sanitary Code, (b) obtained and reviewed the LHAs’ policies and procedures relative to unit site inspections, and (c) made inquiries with the local boards of health to determine whether any citations had been issued, and if so, the LHA’s plans to address the deficiencies.

To determine whether the modernization funds received by the LHAs were being expended for the intended purposes and in compliance with laws, rules, and regulations, we obtained and reviewed the Quarterly Consolidated Capital Improvement Cost Reports, Contracts for Financial Assistance, and budget and construction contracts. In addition, we conducted inspections of the modernization work performed at each LHA to determine compliance with its work plan.

To determine whether LHAs were receiving operating subsidies in a timely manner, we analyzed each LHA subsidy account for operating subsidies earned and received and the period of time that the payments covered. In addition, we made inquiries with the LHA's Executive Director/fee accountant, as necessary. We compared the subsidy balance due the LHA per DHCD records to the subsidy data recorded by the LHAs.

To assess controls over waiting lists, we determined the number of applicants on the waiting list for each state program and reviewed the waiting list for compliance with DHCD regulations.

To assess whether each LHA was adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the LHAs had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHAs to renovate the units.

AUDIT RESULTS

1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

The Department of Housing and Community Development’s (DHCD) Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to the minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. For the period July 1, 2003 to June 30, 2005, we reviewed inspection reports for 36 of the 440 state-aided dwelling units managed by the Haverhill Housing Authority. In addition, from January 30, 2006 through February 15, 2006, we conducted inspections of units located at the Authority’s Bradford Terrace, Kennedy Circle, Julian Steele, and Washington Square (Elderly Developments 667-1, 667-2, 667-3, and 667-4); Summer Street/Mt. Vernon Street, Hilldale Avenue, and Brookdale Lane (Family Housing Developments 200-1 and 200-2); and South Warren Street, Brook Street, Tremont Street, and Albert Avenue, (Family Housing Developments 705-1 and 705-2). Our inspection noted 61 instances of noncompliance with Chapter II of the State Sanitary Code, including roofs, floors, and sidewalks in need of replacement; health-endangering mold and mildew in bathrooms, kitchens, exterior walls, and basements; water damage to ceilings; rusted window lintels; and failed thermal break materials in window frames. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs documenting the conditions found.)

The photographs presented in Appendix II illustrate the pressing need to address the conditions noted, since postponing the necessary improvements would require greater costs at a future date, and may result in the properties not conforming to minimum standards for safe, decent, and sanitary housing.

DHCD Modernization Project No. 128029 commissioned CBI Consulting Inc. to do a study entitled “Evaluation of Building Envelope for Repair and Mold/Moisture Remediation” for the 200-1 Family Housing Development located on Summer Street and Mt. Vernon Street in Haverhill. CBI’s October 10, 2005 report contained the following observations:

A. Exterior Walls:

- *Masonry – The brick masonry was found to appear relatively sound with several specific areas requiring corrective action. Much of the masonry wall between the top floor windows and the roof flashing has been forced upward and outward by the formation of rust on the window lintels. The movement has compromised the attachment of the masonry to the backup wall and created long horizontal cracks in the brick mortar joints that allow water into the wall system.*
- *There are several corners with displaced brick due to thermal movements that have also caused a loss of attachment of the brick veneer in the form of diagonal cracks.*
- *The walls were designed with a fabric membrane flashing that has deteriorated and is no longer effective. The membrane has shrunk, cracked, and split, making it ineffective in controlling water behind the brick veneer. This membrane was used to protect the lintels, the interior, and the basement from water that penetrates the masonry. With the deterioration of this membrane, the building becomes susceptible to water penetration to the interior and further rusting of the window lintels.*
- *Another source of water penetration into the walls is at the sill of the window frames. Leakage at the joints between the sill and the jambs, where the thermal break in the window frame has shrunk, allows water into the masonry. The sealant joints between brick and the window frames have also failed in many locations and are another source of water penetration.*
- *The lack of insulation in the walls appears to cause condensation to occur on the exterior wall surfaces, which are colder than the interior walls. The combination of this condensation, especially in apartments with high levels of humidity, and leakage in certain areas contributes to the formation of mold on the exterior walls. Mold is also present in and adjacent to some bathrooms. Mold is also present along exterior walls in parts of the basements, and to a greater extent in the Summer Street basement, which has experienced more plumbing problems.*

B. Windows: *The failed thermal break materials in the window frames were found to be sources of water leakage into the masonry and potential sources of moisture contributing to mold conditions, such as mold growth on walls below window sills. The sealant around the perimeters of the windows has also failed at many locations. There are missing and broken screens, and some fogged insulated glass units.*

C. Roofs: *The existing BUR [built-up roof] membranes have outlived their useful lives, are generally wet below, and are leaking into apartments. The penthouse masonry is in poor condition with deteriorated base flashings, leaking roofs, and deteriorated incinerator chimneys. The walkway guide railings do not meet current code requirements for opening size. The roofing membranes need*

replacement with membranes capable of resisting some damage from unauthorized tenants. The penthouses need major masonry repair or cladding, as well as new roofing membranes.

D. *Interiors:* The apartments are small with a cramped floor plan. The bathrooms were not designed with showers in mind, and there is no venting of humid air except for opening windows, which is unrealistic in winter when venting is needed. This lack of venting contributes significantly to the formation of mold on the exterior walls, as well as within and adjacent to the bathrooms. The addition of insulation on either side of the exterior walls along with wall repairs should significantly reduce the formation of mold. The significant removal of moisture from the apartments will also limit mold growth on interior walls and in the bathrooms.

E. *Plumbing:* The cast iron waste pipes for the kitchens appear to be in poor condition with continuing failures and leaks. At a minimum, the 2" diameter cast iron pipe for the kitchen waste appears to be deteriorating and will likely continue to fail and leak into the basement. The 2" bathroom pipe appears to be constructed with the same material as the kitchen pipe but is continuing to perform satisfactorily at this time. The lead toilet sweeps have been failing regularly. The cause of the continuing blockages in the main waste line from the Summer St. building needs to be determined, as does the leakage below the handicap apartment's shower area.

F. *Entrances:* The entrance foyers appear structurally sound, but are unsightly and in need of repair. The paint on the wood fascias is stained and peeling, and joints have opened. There are numerous loose or missing caps on the roofing panel standing seams. The cause of the deterioration of the paint appears to be primarily from internal moisture on the backside of the unprimed plywood. Short of removing and replacing the wood with primed wood, the sources of moisture need to be corrected and the foyers vented to limit moisture drive to the plywood. One foyer and the sidewalk have settled, forming openings at the building wall and a puddle on the walk. This movement does not appear recent or a concern at this time, but has created some tripping hazards.

Recommendation

The Authority should apply for funding from DHCD to address the problems identified through the CBI study, the issues noted during our inspections of the interior (dwelling units) and exterior (buildings) of the Authority, and any other issues that need to be addressed. Moreover, DHCD should obtain and provide sufficient funds to the Authority in a timely manner so that it may provide safe, decent, and sanitary housing for its tenants.

Auditee's Response

In response to this issue, the Authority provided the following comments on its managed properties:

Most of the items of non-compliance were located at our 200-1 family housing development. This 1948 Veteran's development has been experiencing water/mold issues. Because of these issues the Commonwealth of Massachusetts Department of Housing and Community Development funded an evaluation of the buildings in that development. This study, done by CBI Consulting Inc., is intended to identify the problems in order to assist in solving the problems with the building envelope.

Unit #1 The water damage on the ceiling was from the bathroom on the second floor and this was repaired.

Unit #5 The tenant in this unit was evicted. While I am not denying we have a moisture and mold issue I assure you it is not as bad as the photo shows. This is how the tenant was living. There was no housekeeping in that unit. This was not the only reason for the eviction but it did contribute to the eviction. Unit #9 shows a mold condition. We do have a problem especially in the bathrooms that we are hoping will be addressed with the completion of the CBI study.

Unit #8 This photo shows a hole in the wall. In the hole you can see the stack pipe is white PVC. The original cast iron pipes in the walls are deteriorating. According to our plumber this is not surprising as the quality of the post World War II metal was poor. The hole therefore was intentionally cut in order to repair this stack pipe. This section of the pipe was repaired and the wall tiles were also repaired. Unit #29 is a third floor apartment. This three-story building does have roof leaks.

Unit #35 is also a third floor apartment. Most of the third floor apartments are off line due to the roof leaks. The second photo shows an entrance porch at our 667-2. While this is somewhat unsightly, the Kennedy Circle complex overall is a very nice development. This item would not be a priority; our priorities would be outlined in the response to the June 9th questionnaire.

This picture at 25 Washington Square is also a porch and does not affect the inside of the unit. Please again refer to the June 9th questionnaire for concerns at this 667-4 development. The second photo shows rusted window lintels. This rust did not force the copper flashing upward. This was done intentionally for the study in order for the architect to see the condition. What the rusted lintels have done is created a condition called "rust jacking". Rust jacking is when the force of rusting metal lifts the section of the building at its weakest point in this case it would be above the third floor windows in a three-story building.

770 Washington Street. What happened here was a huge icicle fell from the main roof above the lower entrance overhang roof. The icicle penetrated the roof membrane on this entrance overhang. The water from the melting snow, ice and rain caused this damage. This overhang was repaired by HHA maintenance and is in good condition. A change in either the overhang design or the roof material would assist in preventing this from happening in the future.

While the Authority stated that it has been difficult managing its programs without the benefit of a modernization program, it also acknowledged that DHCD has allocated funding for a building evaluation to determine the sources of moisture-related problems at the Authority's 200-1 development.

2. MODERNIZATION INITIATIVES NOT FUNDED

On January 23, 2007, in response to our follow-up questions, the Authority identified the following modernization needs for its Elderly Developments:

<u>Program</u>	<u>Description</u>
667-1,2,3	Fire Alarm Replacement *
667-2,4	Roof Replacement
667-All	Kitchen and Bath Renovation

* As of October 25, 2007, DHCD has funded this project and the work has been completed. The remaining modernization needs have not received funding.

Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. If the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised. Lastly, deferring the present modernization needs into future years will cost the Commonwealth's taxpayers additional money due to inflation, higher wages, and other related costs.

In June 2000, Harvard University awarded a grant to a partnership of the Boston and Cambridge Housing Authorities to undertake a study of state-aided family and elderly/disabled housing. The purpose of the study was to document the state inventory of capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give local Massachusetts housing authorities the tools to preserve and improve this important resource. The report, "Protecting the Commonwealth's Investment – Securing the Future of State-Aided Public Housing," dated April 4, 2001, stated, "Preservation of existing housing is the fiscally prudent course of action at a time when Massachusetts faces an increased demand for affordable housing. While preservation will require additional funding, loss and replacement of the units would be more expensive in both fiscal and human terms."

Recommendation

The Authority should appeal to DHCD to provide the necessary modernization funds to address the Authority's needs in a timely manner.

3. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 122 days. Moreover, we found that as of June 30, 2005, there were over 600 applicants on the Authority's waiting list.

By not ensuring that vacant units are reoccupied within DHCD's guidelines, the Authority may have lost the opportunity to earn potential rental income net of maintenance and repair costs, and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing.

Recommendation

The Authority should ensure that the vacant units are refurbished and reoccupied within DHCD's timeframe. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandates.

Auditee's Response

In response to this issue, the Authority stated:

The HHA agrees that if modernization monies were available much of the work that is now done by our maintenance department would be done as a [modernization] project. The HHA has done complete kitchen and bath renovations in units as vacated. Obviously this takes more time than a more typical clean and paint vacancy turn around. This is the reason for the excessive turn around time however the HHA feels this has been an effective way of modernizing some of the units without modernization funding.

SUPPLEMENTARY INFORMATION***Haverhill Housing Authority–Managed State Properties***

The Authority's state-aided housing developments, the number of units, and the year each development was built is as follows:

<u>Development</u>	<u>Number of Units</u>	<u>Year Built</u>
200-1	36	1948
200-2	68	1950
667-1	52	1961
667-2	80	1963
667-3	92	1970
667-4	78	1980
705-1	10	1971
705-2	<u>24</u>	1988
Total	<u>440</u>	

APPENDIX I

State Sanitary Code Noncompliance Noted

200-1 Family Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
134-146 Summer Street	Roof leaking and deteriorating	105 CMR 410.500
17-25 Mt. Vernon Street	Roof leaking and deteriorating	105 CMR 410.500
17-25 Mt. Vernon Street	Bricks missing from building exterior	105 CMR 410.500
17-25 Mt. Vernon Street	Rust on window lintels forcing copper flashing upward and outward	105 CMR 410.500

200-2 Family Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
22 Brookdale Lane	Water damage to kitchen ceiling from pipe drain	105 CMR 410.500
	Unsanitary foyer entrance in disrepair	105 CMR 410.500
134-146 Summer Street		
<u>Unit No.</u>		
1	Kitchen: water damage on ceiling	105 CMR 410.500
	Living room: water damage on ceiling	105 CMR 410.500
	Kitchen sink: damage to sink	105 CMR 410.100
	Living room: walls are chipping	105 CMR 410.500
2	Living room: walls are chipping	105 CMR 410.500
	Bathroom: mold on tub	105 CMR 410.750
3	Bedroom #1: floor needs to be replaced	105 CMR 410.500
	Bedroom #2 floor needs to be replaced	105 CMR 410.500
	Cracked asbestos pipes in bedroom	105 CMR 410.353
4	Bathroom: mold on ceiling	105 CMR 410.750
5	Bathroom: health-endangering black mold on walls and ceiling; walls are in grave disrepair	105 CMR 410.750
	Living room: mold on walls	105 CMR 410.750
	Bedroom #1: mold on walls	105 CMR 410.750
	Bedroom #2: mold on walls	105 CMR 410.750
	Bedroom #3: mold on walls	105 CMR 410.750
	Kitchen: counter tops are decaying	105 CMR 410.100
	Living room: walls are chipping	105 CMR 410.500
	Living room: floors need replacing	105 CMR 410.500
	Bathroom: floors need replacing	105 CMR 410.500
	Bedroom #1: floors need replacing	105 CMR 410.500
	Bedroom #2: floors need replacing	105 CMR 410.500
6	Bedroom #3: floors need replacing	105 CMR 410.500
7	Bathroom: mold on ceiling	105 CMR 410.750
	Bathroom: rust on tub	105 CMR 410.150
8	Kitchen: health-endangering black mold on walls	105 CMR 410.750
	Kitchen: hole in wall	105 CMR 410.500

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
9 21 Mt. Vernon Street <u>Unit No.</u>	Bathroom: health-endangering black mold on ceiling and walls	105 CMR 410.750
27	Bathroom: health-endangering black mold on ceiling and walls	105 CMR 410.750
29	Bathroom: mold on ceiling/walls, rust around bath tub drain Kitchen: water damaged ceiling-electrocution risk/electrical fire hazard Living room: water damage/mold on ceiling Bedroom #1: ceiling water damage Bedroom #2: cracked and draft-ridden window sill Bathroom: health-endangering black mold on ceiling	105 CMR 410.750 105 CMR 410.750 105 CMR 410.500 105 CMR 410.510 105 CMR 410.750
30	Bedroom #1: hole on wall Living room: water damage/mold on ceiling Bathroom: health-endangering black mold on ceiling Living Room: wall is chipping	105 CMR 410.500 105 CMR 410.750 105 CMR 410.750 105 CMR 410.500
31	Kitchen: tiles are falling out Bathroom: health-endangering black mold on ceiling	105 CMR 410.504 105 CMR 410.750
32	Bathroom: health-endangering black mold on ceiling, wall tile	105 CMR 410.750
33	Living room: crack on wall Bathroom: water damage/health-endangering black mold on ceiling	105 CMR 410.500 105 CMR 410.750
34	Kitchen: water damage/health-endangering black mold Kitchen: Unchecked water damage on floor- a trip hazard	105 CMR 410.750 105 CMR 410.504
35	Kitchen: hole on ceiling Kitchen: water damage on cabinets	105 CMR 410.500 105 CMR 410.100
36	Bathroom: Health-endangering black mold on ceiling Kitchen: health-endangering black mold on ceiling	105 CRM 410.750 105 CMR 410.750

667-2 Elderly Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
Kennedy Circle Unit #8	Crumbling concrete foundation	100 CMR 410.500
Kennedy Circle Unit #21A	Deteriorating brick mortar joints	100 CMR 410.500
Kennedy Circle Unit #38	Deteriorating brick mortar joints	100 CMR 410.500

667-4 Elderly Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
25A Washington Square	Building in need of new roof	100 CMR 410.500
	Exterior walls: cracks in bricks' mortar joints allow water into wall system	100 CMR 410.500

667-3 Elderly Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
770 Washington Street	Entrance door overhang in need of replacement	100 CMR 410.500

APPENDIX II

Photographs of Conditions Found

**200-2 Family Development, 21 Mt. Vernon Street, Unit #29
Cracked and Draft- Ridden Window Sill in the Bedroom**



**200-2 Family Development, 134 Summer Street, Unit #1
Water Damage on Ceiling in the Living Room**



**200-2 Family Development, 134 Summer Street, Unit #3
Cracked Asbestos Pipes in the Bedroom**



**200-2 Family Development, 134 Summer Street, Unit #5
Health-endangering Black Mold on Walls**



**200-2 Family Development, 140 Summer Street, Unit #9
Health-endangering Black Mold on Ceiling in the Bathroom**



**200-2 Family Development, 140 Summer Street, Unit #8
A Gaping Hole on Wall in the Kitchen**



**200-2 Family Development, 21 Mt. Vernon Street, Unit #29
Water Damaged Ceiling – Electrocution Risk/Electrical Fire Hazard**



**200-2 Family Development, 21 Mt. Vernon Street, Unit #35
Unchecked Water Damage on Kitchen Floor – A Trip Hazard**



**667-2 Elderly Development, Kennedy Circle, Unit #8
Crumbling Concrete Foundation**



**667-4 Elderly Development, 25A Washington Square
Cracks in Bricks' Mortar Joints Allow Water into Wall System**



**200-1 Family Development, 17-25 Mt. Vernon Street
Rust on Window Lintels Forces Copper Flashing Upward and Outward**



**667-3 Elderly Development, 770 Washington Street
Entrance Door Overhang in Need of Replacement**

