

Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
Reference		
https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities		

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

→ Go directly to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes

→ Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels
OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “no.” For any other type of aboveground storage container within the search area that holds one of the

flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “yes.”

No

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.*

Yes

→ *Continue to Question 4.*

4. Visit HUD’s website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- **Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and**
- **Electronic assessment tool calculation of the required separation distance.**

Based on the analysis, is the proposed HUD-assisted project site located at or beyond the required separation distance from all covered tanks?

Yes

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

No

→ *Go directly to Question 6.*

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*

No

→ *Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.
Continue to Question 6.*

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Since the rehabilitation program for owner occupied residential units does not increase residential densities, perform new construction, convert a building for habitation or make a vacant building habitable, the program is in compliance with this requirement.

See Project Description

Are formal compliance steps or mitigation required?

- Yes
 No

Program Description

Regional Housing Rehabilitation Loan Program of Lane County (RHRP)

<u>Grantee</u>	<u>Sub-Grantee</u>
City of Florence 250 Highway 101 Florence, OR 97439	St. Vincent de Paul Society of Lane County P.O. Box 24608 Eugene, OR 97402

The service area for the RHRP includes the Oregon Cities of Florence, Veneta, Oakridge, Westfir, Lowell, Cottage Grove, Junction City and Creswell as well as unincorporated portions of Lane County.

The RHRP provides deferred-payment loans to low and moderate income homeowners as per current HUD income eligibility guidelines for rehabilitation services to the home where the homeowner occupies no less than 50% of the living space. "Major" rehabilitation (Rehab loan is more than 50% of the value of the Structure) is only allowed under the approved RHRP policy when using Non-CDBG funds such as funds in the Revolving Fund account that have been de-federalized. In this case and for all newly awarded CDBG funds for owner occupied housing rehabilitation, the RHRP will perform only "Minor" (Rehab loan is 50% or less of the value of the Structure) rehabilitation projects. All minor rehabilitation projects will not allow for alteration or expansion of the existing building foot print, does not include acquisition of existing housing, land or **perform new construction**. Furthermore, the RHRP does not engage in re-zoning for minor projects including conversion of farmland to non-agricultural uses **nor does the RHRP increase residential densities, convert a building for habitation or make a vacant building habitable.**

The RHRP does many types of project activities to meet or exceed our objective of alleviating health and safety issues, correcting structural deficiencies in order to help conserve existing housing stock, increase housing opportunities and enable lower income homeowners to remain in their homes. Eligible rehabilitation activities include Septic Systems and private Sewer connections, Well and Water Supply, Foundation and Crawl Space Repairs, Electrical Systems, Heating Systems, Water Heaters, Plumbing, Siding, Paint, Windows, Doors, Roofs and roof Drainage, Dry rot repairs, Flooring repairs, Weatherization measures, Insulation, Hazardous tree removal, Landscaping – trimming shrubs for preservation of the dwelling, Lead work (inspection, assessment, lead safe work practices and clearance inspection), Asbestos testing and removal of Architectural Barriers and installation of Accessibility measures as per reasonable accommodation requests.

Items that are identified in the Statutory Worksheet as status B will require site specific review. St. Vincent de Paul has established procedures for identifying properties that will require further review. For Historic Preservation, all projects with a home, determined from the Regional Land Information Database of Lane County (RLID), to be older than 45 years, documentation such as the project scope of work, elevation photos and any other relevant information, will be submitted for review, comment and concurrence by the State Historic Preservation Office (SHPO). Furthermore, projects involving ground disturbing activities will be submitted for review with SHPO and respective Tribal Historic Preservation Office (THPO) will be notified of such activity and an Inadvertent Discovery Plan will be implemented

when needed. In regards to Endangered Species the provided guidance shall be followed and each project will complete the Procedure for Section 7 Determination Worksheet for each project to confirm the effect. Noise abatement will be considered and mitigation technics such as double pane windows and insulation may become part of the scope of work for all project properties that are determined with high noise levels. For projects, where upon site inspection, detection or suspicion of Toxic chemicals or Radioactive materials may be present, an appropriate specialist will be used to assess the risk and propose corrective measures. All project properties will be screened for the potential of Flood Disaster by obtaining a third party Flood Report. Projects that are determined to be within a 100 year flood plain will require Flood insurance in accordance with Federal rules and RHRP policy.

The historical average RHRP loan is just over \$23,000 and in consideration of anticipated costs dealing with Lead based paint, it is assumed that the average loan will be \$25,000. This new CDBG award provides an approved budget for eligible housing rehabilitation of \$300,000, thus we expect to serve at least 12 household units.