Welcome to the 2019 Inspectors and Contractors Forum
History of Maryland’s Lead Law

- **1993**: Over 14,000 children with a blood lead level above 10 µg/dl in Maryland
- **1994**: Reduction of Lead Risk in Housing Law enacted;
- **1996**: Implementing regulations adopted
- **2000**: Governor’s Initiative to increase compliance, blood lead testing, and improvements to housing
- **2004**: Local rental registration and repossession for failure to pay rent linked to compliance with state lead law
- **2005**: Elevated blood lead level reduced to from 15 to 10 µg/dl (effective 2006)
- **2008**: Lead-containing children’s products prohibited
- **2011**: Summer study to reduce childhood lead poisoning
- **2012**: Law expanded to cover all pre-1978 residential rental properties (effective 2015)
- **2016**: Universal testing (by MDH regulations)
- **2017**: Lead in drinking water at schools law passed
- **2019**: Elevated blood lead level reduced from 10 µg/dl to CDC reference level; lead in drinking water at schools law amended
Significant Progress

• Maryland has made significant progress to reduce the number of young citizens exposed to this preventable disease by over 98% since 1996. This decline is in part because:
  – Lead Safe Work Practices make the work area safer for families and workers;
  and
  – Lead Based Paint Inspections are Maryland’s primary prevention measure to ensure children are safe from lead based paint hazards.
MARYLAND DEPARTMENT OF THE ENVIRONMENT
CHILDHOOD LEAD SURVEILLANCE
STATEWIDE: 1993-2017

% CHILDREN TESTED, BLOOD LEAD ≥10 µg/dL

CALENDAR YEAR
(Number of Children with BLL ≥10 µg/dL)
(Number of Children Tested)
Maryland Lead Highlights

• In 2016 universal blood lead testing of all children ages one and two years was implemented in Maryland statewide.
• In 2017 blood lead testing of children 0-72 months increased by more than 19% when compared to CY 2015 when universal testing was not in place.
• Despite such an increase in blood lead testing, the number of children 0-72 months identified with blood lead levels of ≥10µg/dL increased from 355 in CY 2016 to 388 in CY 2017.
• However, the overall number of children identified with blood lead levels of ≥ 5µg/Dl decreased from 2,084 in CY 2016 to 2,049 in CY 2017.
MDE Case Management Guidelines ("Guidelines") require medical case management when a child aged 0-72 months is identified with a first time venous or two capillary blood lead tests of ≥10 µg/dL ("Confirmed Case").

During CY 2016, the Department began comprehensively tracking sources of childhood lead exposure. While lead-based paint is still the most frequently identified hazard, a significant number of children aged 0-72 months that were identified with an Elevated Blood Lead Level of ≥10 µg/dL ("EBL") may have been exposed to lead from sources other than lead-based paint hazards. Other risk factors included exposure to sources such as cosmetics and spices.
Of the 260 Confirmed Cases during CY 17 in Maryland, there were a total of 81 Confirmed Cases identified in Baltimore City. This was an decrease in of 26 cases compared to the Confirmed Cases in Baltimore City in CY 2016 (107). This was a decrease of 59 cases compared to 140 Confirmed Cases in CY 15.

* Data Based on Baltimore City Health Department
Of the 260 Confirmed Cases during CY 2017 in Maryland, there were a total of 179 Confirmed Cases identified in the Maryland Counties (excluding Baltimore City). This was an increase of 48 cases compared to the Confirmed Cases in Maryland Counties in CY 2016 (131).

The increase in the number of confirmed cases was expected due to increased testing. At the jurisdiction (county) level, blood lead testing of children ages one and two increased in seventeen (17) jurisdictions.
## Confirmed Cases CY 2017
Owner Occupied vs. Rental & Built Date
Maryland Counties

<table>
<thead>
<tr>
<th>Occupancy Type</th>
<th>Pre-1950</th>
<th>1950-1977</th>
<th>Post 1977</th>
<th>Total Cases (179)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Property</td>
<td>15 (8.4%)</td>
<td>81 (45.2%)</td>
<td>18 (10.1%)</td>
<td>114 (63.7%)</td>
</tr>
<tr>
<td>Owner Occupied</td>
<td>25 (14%)</td>
<td>14 (7.8%)</td>
<td>26 (14.5%)</td>
<td>65 (36.3%)</td>
</tr>
</tbody>
</table>
In Maryland Counties Of all 259 sources identified:
  • 66 were lead based paint hazards. (Defective Lead Paint, Lead Dust, soil);
  • 193 were sources other than lead based paint hazards
  • 25 were Unknown or Unable to Determine.

In Baltimore City Of all 64 sources identified:
  • 58 were lead based paint hazards. (Defective Lead Paint, Lead Dust);
  • 6 were sources other than lead based paint hazards
  • 17 were Unknown or Unable to Determine.
County/Municipal Rental Registration - outreach to all agencies in Maryland that have a rental certification/licensure requirement to determine what processes are in place to ensure that Pre-1978 residential rental properties are compliant with lead laws.
Current Initiatives

Housing Authorities statewide- outreach to all housing authorities in Maryland that have a rental to determine what processes are in place to ensure that Pre-1978 residential rental properties are compliant with lead laws.
Team Work: The Benefits of Compliance Assistance
Team Work: The Benefits of Compliance Assistance

LEAD ACCREDITATION & OVERSIGHT DIVISION’s (LAOD) MISSION STATEMENT:

“To assist in preventing childhood lead poisoning, and protecting at-risk individuals, from lead exposure, by providing vigilant oversight of the regulated community, to ensure compliance with Maryland’s Lead Laws, pertaining to lead accreditation, lead inspection and lead abatement requirements.”
In order for us to achieve our mission, we need you! And,
You are a member of the lead service provider industry profession, and you are our partners in compliance.

Together, we protect persons at risk from being exposed to lead paint hazards, thereby reducing elevated blood lead levels caused from lead paint exposure.
And, **we** worked together to achieve this important result:
MARYLAND DEPARTMENT OF THE ENVIRONMENT
CHILDHOOD LEAD SURVEILLANCE
STATEWIDE: 1993-2017

% CHILDREN TESTED, BLOOD LEAD ≥10 µg/dL

CALENDAR YEAR
(Number of Children Tested)
(Number of Children with BLL ≥10 µg/dL)
One of the most important services that LAOD provides to our 3rd party lead service provider partners and persons at risk is:

**COMPLIANCE ASSISTANCE**
Team Work: The Benefits of Compliance Assistance

What is “Compliance Assistance”?

Assistance/Guidance that LAOD provides to lead service providers:

• To ensure compliance with Risk Reduction Laws and regulations

• To be proactive in reducing and avoiding violations, enforcement actions, and harm to persons at risk and purchasers of lead services and stakeholders (as applicable*)
That “as applicable” notation:

We welcome and actively seek and encourage opportunities to provide Compliance Assistance to our lead service provider partners; however, for issues/violations that adversely affect human health, are particularly egregious, and in instances where our lead service partners are unresponsive, or do not make timely corrections, formal enforcement actions may be necessary.
Team Work: The Benefits of Compliance Assistance

Types of Compliance Assistance Services offered by LAOD:

• Perform oversight inspections and audits of your work to ensure compliance and reduce hazards and negative impacts

• Provide guidance and feedback from our oversight inspections and audits, to improve skills, outcomes and/or validate work

• Provide responses to technical questions and assist in providing guidance for typical and atypical situations
Types of Compliance Assistance Services offered by LAOD (cont’d):

• Provide new/revised regulatory information - Lead Bulletins, Surveys and e-mails

• Identify common issues and pitfalls

• Assistance with Accreditation Applications/Requirements

• Outreach events - Inspector/Contractor Forums, Training Provider, and Compliance Assistance Meetings, Other Issue Specific Interactions
Team Work: The Benefits of Compliance Assistance

Compliance Assistance can be randomly, or purposefully initiated by LAOD as a compliance/Quality Assurance check

Or

Compliance Assistance may be requested by an accredited lead service provider

Both are opportunities for improvement/validation and team building
What are the benefits of Compliance Assistance?

- More effective in protecting persons at risk and stakeholders
- Proactive (vs. Reactive) - making corrections to improve, avoid enforcement actions and collateral damage to stakeholders (Remember: “an avalanche begins with a single snow flake”)
What are the benefits of Compliance Assistance? (Cont.’d)

- save money, stay out of trouble and court, mitigate damages

• Create a business advantage – streamline activities and achieve economies of scale (Doing it right the first time)

• Build a Reputation – ethical advocate, successful, pays dividends – repeat customers, strong message to those who want to take short cuts
Team Work: The Benefits of Compliance Assistance

What are the benefits of Compliance Assistance? (Cont.’d)

- Demonstrates and fosters commitment between team members
- Opportunities to communicate and build positive relationships
Team Work: The Benefits of Compliance Assistance

“An ounce of prevention is worth a pound of cure”

• From January 1, 2017 Through May 24, 2019, MDE sent out 117 “Invalid Certificate Letters” (ICLs)

• The 117 ICLs included a combined total of 257 violations, consisting of the following:
Team Work: The Benefits of Compliance Assistance

“An ounce of prevention is worth a pound of cure”

- Missing Certificates – 50
- Defective Paint – 45
- Missing Documents – 46
- Lead Found in Home w Lead Free or Limited Lead Free Cert. – 106
- Inspector Related to Owner - 10
Team Work: The Benefits of Compliance Assistance

An ounce of prevention is worth a pound of cure”

• Many of these violations could have been, and can be, avoided under Compliance Assistance

• We, as partners, need to work together to be proactive to prevent certificates from being invalidated

• The violations are not fair to persons at risk or the property owners paying for lead services
As your partners in compliance, we will be available to:

• Communicate regularly and advise you of important changes

• Provide assistance and guidance

• Be responsive and timely

• Continuously improve our processes – Some things that are coming up:
Team Work: The Benefits of Compliance Assistance

- Lead Rental Certification and Accreditation (LRCA) Database – on-line system that will allow accreditation applications, completion and submittal of lead certificates, inspection and abatement notifications to be submitted on-line. (Procurement in process with development anticipated to begin in the Fall 2019)
Team Work: The Benefits of Compliance Assistance

- Revision of COMAR Regulations are in process
- Host regular Inspector/Contractor Forums & Quarterly Training Provider Meetings
- Regular Lead Bulletins and Input/Feedback Surveys to our partners
As our partners in compliance, we ask that you:

• Continue learning and honing your skills after your training – study COMAR Regulations, EPA CFR, HUD Guidelines, and other references; seek out new information and new ideas. (Our profession is not “one and done” (regarding training), it’s a profession of perpetual learning.

• Ask questions and request a field visit or meeting – your first inspection or abatement project, or review of paper work and form submittal, atypical situations; Don’t undertake unnecessary risk.
Team Work: The Benefits of Compliance Assistance

As our partners in compliance, we ask that you:

• Be responsive to our communications and requests for information – this includes keeping your contact information up to date – If we don’t hear from you we can’t resolve issues and have no choice but to initiate an enforcement action.

• Keep your records organized and available for the required 5 years – This is a business profession.
Team Work: The Benefits of Compliance Assistance

As our partners in compliance, we ask that you:

• Submit your 24 hour inspection notifications and abatement notifications as required

• Submit your completed certificates and supporting documentation within the 10 day requirement
As our partners in compliance, we ask that you:

• Most importantly, please remember that the result of your work, and our work, protects persons at risk, by reducing risk to lead paint exposure, thereby preventing elevated blood lead levels.
Team Work: The Benefits of Compliance Assistance
Team Work: The Benefits of Compliance Assistance

THANK YOU ALL FOR COMING
Team Work: The Benefits of Compliance Assistance

Now all we need is a theme song.
Team Work: The Benefits of Compliance Assistance

Michelle Armiger, Chief LAOD

410-537-3825

michelle.armiger@maryland.gov
MARYLAND'S LEAD PAINT LAWS

Christopher S. Corzine
Assistant Attorney General
Office of the Attorney General
Maryland Department of the Environment
REDUCTION OF LEAD RISK IN HOUSING ACT Title 6, Subtitle 8 of the Environment Article
Goals

- Prevent Childhood Lead Poisoning
- Create and preserve safer, affordable rental housing
PRESUMPTIONS

• All paint in a pre-1978 property is presumed to be lead based paint.
• A noncompliant owner failed to exercise reasonable care.
• A compliant owner exercised reasonable care.
WHO MUST COMPLY

Mandatory for all pre-1978 rental units.
EXEMPTIONS FROM LAW

- A rental dwelling unit that was built in 1978 or after.
- A rental dwelling unit built prior to 1978 that is certified “lead free” by an accredited MDE inspector and has a valid “lead free” certificate on file with MDE.
- A seasonal or transient property such as a hotel or motel.
- A rental dwelling unit that does not have permanent provisions for living, sleeping, eating, cooking and sanitation.
Reduction of Lead Risk in Housing Act

- Registration
- Educational Materials
- Lead Risk Reduction

Title 6, Subtitle 8 of the Environment Article
REGISTRATION

- Register each property listing all units
- Renew registration annually
- Online Registration – www.mde.state.md.us

§§ 6-811, 6-812
DISTRIBUTION OF EDUCATIONAL MATERIALS

- Information Distribution
  - Tenant’s Rights Package
  - EPA – Protect Your Family From Lead in Your Home.
  - Certificate of Compliance
- Requirements for Distribution
  - Inception of Tenancy
  - Every 2 Years of Tenancy

§§ 6-820 & 6-823
Lead Poisoning Prevention

Notice of Tenants’ Rights

INTRODUCTION

This Notice of Tenants’ Rights explains your legal rights pursuant to the Maryland Reduction of Lead Risk in Housing Law, which went into effect on February 24, 1996. Under this law, property owners are required to abate all lead-based paint hazards in rental properties constructed prior to 1950, register their properties with Maryland Department of the Environment’s (MDE) Lead Poisoning Prevention Program, and provide tenants with lead educational materials. In exchange for complying with the law, property owners are entitled to limited liability protection in the event a child or pregnant woman is poisoned in their property.

This Notice of Tenant’s Rights provides a detailed explanation of what property owners are required to do to comply with the law, how to inform your landlord that repairs need to be performed in your home, and steps you can take to enforce your legal rights if your landlord refuses to respond to your request.

Please read this material carefully and call the Lead Hotline at 410-537-4199 or 800-776-2706 if you have any questions. (TTY Users 800-735-2258)

I HAVE JUST MOVED INTO A RENTAL HOME THAT WAS BUILT BEFORE 1950, WHAT DO I NEED TO KNOW?

In order to be fully compliant with the law, your landlord is required to:

1) Give you the Notice of Tenant Rights, the EPA brochure, “Protect Your Family from Lead in Your Home”, and a copy of the lead inspection certificate for the unit on or before the day you move in. The property owner may ask you to sign a statement acknowledging that you received these items.

2) Register the property with the Maryland Department of the Environment (MDE) and pay a $15.00 annual registration fee.

3) Perform lead hazard maintenance called Full Risk Reduction Treatments and provide you a certificate. This means that when you move in, there should be:
   a. No chipping, peeling or flaking paint;
   b. Smooth and cleanable window sills, window sills, and floors;
   c. Doors that open and close smoothly; and
   d. Floors and windows that have been HEPA vacuumed and wet washed, removing lead dust.
Protect Your Family From Lead In Your Home
TYPES OF RISK REDUCTION CERTIFICATES

- Lead Free
- Limited Lead Free
- Full Risk Reduction
- Modified Risk Reduction
When Does an Owner have to meet the Modified Risk Reduction Standard?

Triggers for Modified Risk Reduction Reduction

- Notice of Child with a EBL $\geq 10 \mu g/dL$.
- Notice of Defect from any source.

§ 6-819
NOTICE OF DEFECT/NOTICE OF ELEVATED BLOOD LEVEL ABOVE 15 µg/dl

**TENANT: SEND THIS NOTICE BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED OR HAND DELIVER THIS NOTICE AND GET A SIGNATURE FROM THE PROPERTY OWNER OR THE PROPERTY OWNER'S AGENT OR MANAGER.**

To:

Name of Property Owner/Manager/Agent
This is to notify you to perform Modified Risk Reduction Treatments under §6-819 of the Environment Article of the Annotated Code of Maryland because:

- A child under the age of six years or a pregnant woman at this address has a blood lead level of 15 micrograms or more per deciliter of blood.

AND/OR

- The following defects require your attention.

### CHIPPING, PEELING, FLAKING PAINT

<table>
<thead>
<tr>
<th>This room, has chipping, peeling, or flaking paint on the:</th>
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<tbody>
<tr>
<td>□ Walls/ceiling</td>
</tr>
<tr>
<td>□ Window sills</td>
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<tr>
<td>□ Window wells</td>
</tr>
<tr>
<td>□ Window frames</td>
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### STRUCTURAL DEFECTS

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<th>This area, has the following structural defects:</th>
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<tr>
<td>□ Leaking ceiling</td>
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<tr>
<td>□ Leaking roof</td>
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<tr>
<td>□ Leaking plumbing</td>
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### PROPERTY OWNER / MANAGER / AGENT SIGNATURE

I, ____________________________ owner / agent of the owner, manager of the above-noted property (circle one) hereby acknowledge receiving this Notice of Defect / EBL.

Signature ____________________________  Print Name ____________________________  Date ____________
REPORT OF ELEVATED BLOOD LEAD LEVEL
OFFICIAL NOTICE

If you have any questions please call the Maryland Department of the Environment
Childhood Lead Poisoning Prevention @ 1-800-776-2706 or (410) 537-4199.

To: __________________________________________

From: __________________________________________

Date issued by Local Health Department __/__/____

Regarding: This is to notify you under Environment Article §§ 6-801 - 6-852, “Reduction of Lead Risk in Housing”, that a person at risk with an elevated blood lead level resides at or spends more than 25 hours per week at the address below. If the blood lead level is over 9 micrograms per deciliter and the property is pre-1950 rental, the property owner has 30 days to satisfy the modified risk reduction standard. If the blood lead level is over 14 micrograms per deciliter and the property is pre-1950 rental, the property owner is in compliance with all provisions of the Reduction of Lead Risk in Housing Law, the property owner has 30 days to make a qualified offer.

Address: __________________________________________

Date of Construction: ____________________________ Lead Rental Registry No. __________________________

The Person-At-Risk had an elevated blood level of _______ micrograms per deciliter on __/__/____

Name: ____________________________ Date of Birth (if child): __/__/____

Environment Article §§ 6-847 Disclosure of Blood Lead Results:
(a) Owner authorized disclosures - (1) An owner who receives the blood lead test results of a person at risk under this subtitle may not disclose those results to another person except: (i) The tenant of the owner, (ii) A medical doctor or other health professional with whom the owner consults, or (iii) A family member of the owner or any person specified in subparagraph (i) or (ii) of this paragraph. (2) A person who receives blood lead test results from an owner under paragraph (1) of this subsection may not disclose those results to any person not specified in paragraph (1) of this subsection. (b) Good faith disclosures: liability. A person who is in good faith discloses or does not disclose the results of a blood lead test to an owner under this part is not liable under any cause of action arising from the disclosure or non-disclosure of the test results. [§ 6-847]

Received by: __________________________________________

Signature of Landlord or Property Owner if Hand Delivering Date

MDE RE-1 form #5 Rev. Jan. 2006

Original - Property Owner's Copy Tenants' Copy Local Health Department's Copy
MARYLAND DEPARTMENT OF THE ENVIRONMENT

LEAD PAINT RISK REDUCTION (MDE FORM 330)  INSPECTION CERTIFICATE NO.

<table>
<thead>
<tr>
<th>MDE TRACKING NO.</th>
<th>MDE PROPERTY NO. (Include county code prefix.)</th>
<th>OWNER NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Address</td>
<td>Unit No.</td>
<td>City</td>
</tr>
<tr>
<td></td>
<td>Zip Code</td>
<td>County</td>
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<td></td>
<td>Property Construction Date</td>
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</table>

The Maryland accredited lead inspector must mark an inspection category 1, 2, 3, or 5 and mark the appropriate inspection method. Only ONE category and method are to be marked. The following attachments are required to be submitted with the certificate: Form C, laboratory results, and diagrams for Full Risk Reduction, and Forms B and C, original signed copy of Supervisor’s Statement of Work, laboratory results, and diagrams collected for Modified Risk Reduction. Form E for Lead Free, which shall include a $10 per unit processing fee for each certificate. To be paid to: P.O. Box 1417, Baltimore, MD 21203. The certificate shall be signed by the inspector who performed the inspection. Inspection certificates and all required attachments must be submitted to MDE within 10 days following Lead Free and Lead Safe Inspections and within 10 days following the receipt of dust sample results for Full and Modified Risk Reduction Inspections. Copies of all inspection records shall be maintained for at least 5 years by lead inspection contractors. Maximum penalties will be pursued by MDE for any falsified documentation that is received by MDE. Indicate *00* if Property Construction Date is unknown. Lead paint inspection contractors must mail inspection certificates and the supporting documentation for inspection certificates to: P.O. Box 943, Jessup, MD 20794.

**INSPECTION CATEGORIES**

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<tr>
<td>A. One Time Only</td>
<td>A. Dust Inspection</td>
<td>D. Visual Inspection and Dust Inspection</td>
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<tr>
<td>(Interior &amp; Exterior)</td>
<td>OR</td>
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<td>B. Limited</td>
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<tr>
<td>(Interior Lead Free Only)</td>
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<tr>
<td>Passing Re-inspection required no later than:</td>
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<tr>
<td>Number of Pre-1950</td>
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<tr>
<td>Lead Free Units</td>
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<td>Number of Post-1949</td>
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<tr>
<td>Lead Free Units</td>
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**PASSED** Based on the findings of the attached inspection report(s), I certify that the property/unit meets the certification criteria at this time. (circle property or unit)

**FAILED** Based on the findings of the attached inspection report(s), the property/unit fails to meet certification criteria at this time. (circle property or unit)

I certify that I inspected the above listed property/unit on ___/___/____ at __:__ a.m./p.m. under Title 6, Subtitle 8 of the Environment Article, Annotated Code of MD.

Inspector’s Name: ___________________________  Inspector’s Signature: ___________________________  Accreditation No.: ___________________________  Accreditation Exp. Date: ___________________________  Inspection Contractor Name: ___________________________  Accreditation No.: ___________________________  Accreditation Exp. Date: ___________________________  

Form Number: MDE 330, Revised: 04/2017

(copyright distribution: original to owner; yellow to MDE; pink to tenant; goldenrod to inspection contractor)
Issuance of Abatement Orders

§ 6-822

- Provides the Department, health departments or other local jurisdictions the authority to issued abatement orders in response to a report of a lead poisoned person at risk.

- Abatements may be ordered in any residential building, including owner-occupied, rentals, child care facilities or pre-school facilities.

- The Department may enforce the provisions of the order.
Title 6, Subtitle 10 of the Environment Article
“Accreditation of Lead Paint Abatement Services”
MDE
ACCREDITATION

- Contractors, Supervisors, Inspectors, Risk Assessors and Trainers must be accredited.
- Workers must be trained.
- Must use safe work practices, which are similar to federal standards.

§ 6-1002
Authority to Order Compliance & Issue Penalties

- Up to $20 per day for failure to register.
- Up to $500 per day, per violation for failure to perform risk reduction.
- Up to $25,000 per violation for failure to be accredited or follow safe work practices.
- Maximum Penalty of $100,000 per action.

§ § 6-849, 6-850, & 7-266
MARYLAND DEPARTMENT OF THE ENVIRONMENT
CHILDHOOD BLOOD LEAD SURVEILLANCE
STATEWIDE 1993-2017

% CHILDREN TESTED, BLOOD LEAD ≥10 µg/dL

CALENDAR YEAR
(Number of Children with BLL ≥10 µg/dL)
(Number of Children Tested)
Adopts CDC Reference Level
- Currently 5 µg/dL

Requires Environmental Investigations for all EBLs greater than or equal to the Reference Level

Amends Modified Risk Reduction Trigger
House Bill 1233
Notice of EBL & Modified Risk Reduction

Current Law – Requires Modified Risk Reduction Inspection 30 days after owner receives Notice of EBL or Notice of Defect.

House Bill 1233 – Requires Modified Risk Reduction only after Environmental Investigation reveals a defect at the property in which the Person at Risk resides or the receipt of a Notice of Defect.
CONTACT

Maryland Department of the Environment
Lead Poisoning Prevention Program

www.mde.state.md.us/lead
410-537-3825
Top 10 Inspection – Work Practice Pitfalls

Becky Singleton, Section Head
Lead Accreditation and Inspector Oversight
Pitfall # 10
Not Accounting for Certificates

- Failing to accurately complete and submit the Inventory Sheet (MDE Form H)
- Intermingling Inspection Certificates between Inspection Contractors
- Failing to keep copies of all inspection certificates and supporting documents for 5 years
FORM H: INVENTORY OF LEAD PAINT CERTIFICATES (Form 330s)

This form is to be used by the inspection contractor, upon request by MDE, to provide an inventory of lead paint certificates (Form 330s). This form is also to be used to request additional Form 330s from MDE. Requests for additional Form 330s may be submitted after at least one-half of the previous batch of Form 330s issued to the inspection contractor has been used (e.g. at least 23 certificates of the 50 issued, etc.). Please allow 7 business days for processing. MDE may require you to submit a copy of previously issued certificates and supporting documents, which may delay the processing.

Please fax this form to: 410-537-3156, email to mde.lpppformh@maryland.gov, or mail to: Maryland Department of the Environment, Lead Poisoning Prevention Program, 1800 Washington Blvd., Suite 630, Baltimore, MD 21230.

<table>
<thead>
<tr>
<th>Contractor Name:</th>
<th>Accreditation No.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspector Printed Name:</td>
<td>Accreditation No.:</td>
</tr>
<tr>
<td>Inspector Signature:</td>
<td>Date: / /</td>
</tr>
<tr>
<td>Inspector Phone No.:</td>
<td>Email Address:</td>
</tr>
</tbody>
</table>

I am requesting more Form 330s: □ YES  □ NO  If YES, how many?: □ 50  □ 100*  □ 200*  □ 300*  □

* Larger requests of 100 or more Form 330s may be granted on a case-by-case basis. If your request is due to a large-scale project, please provide a description of the project, including project name, location, no. of units, and duration:

<table>
<thead>
<tr>
<th>Certificate No. (List Numerically)</th>
<th>Issued or Voided?</th>
<th>Date of Inspection</th>
<th>Property Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>I □ V</td>
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<td>I □ V</td>
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</tr>
</tbody>
</table>
Pitfall # 9
No Inspection Notification

• Failing to submit an Inspection Notification to MDE
• At least 24 hours in advance for inspections
• No later than 2 business days after Risk Reduction Treatments were performed
• For all inspections, including re-inspections
### Inspection Notification Form

**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

Land Management Administration • Lead Poisoning Prevention Compliance & Accreditation Division

1800 Washington Blvd. • Suite 630 • Baltimore Maryland 21230

(410) 537-3825 • 1-800-633-6101 • [www.mde.state.md.us/lead](http://www.mde.state.md.us/lead)

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**INSPECTION NOTIFICATION**

- Inspection Contractor/Inspector is to fax this form to 410-537-3156 or email to [mde.lppp@maryland.gov](mailto:mde.lppp@maryland.gov).
- The Dept. requires notification 24 hrs. in advance of the conduction of any Lead Paint Inspection. COMAR 26.16.02.03B(11) & 26.16.05.04
- The Dept. requires notification with in 48 hrs. of the completion of a Visual Inspection and/or Risk Reduction Treatments. COMAR 26.16.05.08C(9)
- The Dept. reserves the right to perform oversight of all lead inspections performed in the state.

<table>
<thead>
<tr>
<th>Inspection Contractor Name:</th>
<th>Accreditation No.:</th>
<th>Accreditation Expiration Date:</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Inspector Name:</th>
<th>Phone Number:</th>
<th>Accreditation No.:</th>
<th>Accreditation Expiration Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

### INSPECTION CATEGORY

(mark one category for each entry)

<table>
<thead>
<tr>
<th>Lead Free</th>
<th>Full Risk</th>
<th>Modified Clear</th>
<th>Risk Assessment</th>
</tr>
</thead>
</table>

### INSPECTION INFO.

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Full Address (include unit number, if any)</th>
<th>County</th>
<th>Name &amp; Phone No.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

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Pitfall # 8
Incomplete/Inaccurate Form 330

• Mailed to the wrong address
• Late mailing them to MDE
• Not issuing Failing Certificates
• Inspectors not signing the Certificates
• Wrong inspection category checked
• Etcetera, etcetera, etcetera
Form 330 - Inspection Certificate

Sample

Common Errors
Pitfall # 7
Incomplete/Inaccurate Documents

• Supporting documents and forms are incomplete, inaccurate or missing.

• Property owners should get a copy of all forms; including, the Disclaimer Form and all XRF results.

• MDE should also get a copy of all forms; except, the Disclaimer Form, XRF results and Laboratory Chain of Custody.
Every Certificate gets the Disclaimer!!!
Form – SSW  
(Supervisor’s Statement of Work)

- Need to sign 2 copies for the inspector and owner.
- Indicate whether or not you supervised the treatment or only verified the treatment.
FORM B – VISUAL INSPECTION

Effective January 1, 2012 Forms B & C must be submitted with the Inspection Certificate (Form 330) for meeting the Modified Risk Reduction Standard. The lead inspector is to submit a copy of the Form 330, a Form B with original signed Supervisor’s Statement of Work, and Form C with diagram and laboratory results, to Maryland Department of the Environment WITHIN 10 CALENDAR DAYS following receipt of the laboratory analysis report. (COMAR 26.16.02.02). This form must be fully completed and accurate or the Inspection Certificate may be invalidated. (EA 6-8, COMAR 26.16.02.03 and COMAR 26.16.05.05).

Date of Inspection: 11/09/2011
Inspection Certificate No.: 100001
MDE Tracking No.: 000158
In accordance with COMAR 26.16.02.03, certification of a Visual Inspection shall not be issued with out a statement, Supervisor’s Statement of Work (SSW), signed by an accredited supervisor stating that all the lead hazard reduction statement were performed, or are still in effect, in accordance with the statute and applicable regulations. The Supervisor’s Statement of Work (SSW), with original signature, is to be attached to this form.

Supervisor’s Accreditation No.: 55555
Supervisor’s Name: Stanley Supersander
Accreditation Expiration Date: 11/11/2012
Date of Supervisor’s Statement of Work: 11/01/2011

PART II
Enter the total number of each component type within the unit/property.

<table>
<thead>
<tr>
<th>WINDOWS</th>
<th>TOTAL NUMBER</th>
<th>WINDOW SILLS</th>
<th>TOTAL NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Free / Replacement</td>
<td>8</td>
<td>Repainted</td>
<td>6</td>
</tr>
<tr>
<td>Non Lead Free</td>
<td>1</td>
<td>Replaced</td>
<td>3</td>
</tr>
<tr>
<td>Upper Sash Fixed</td>
<td>0</td>
<td>Enclosed / Wrapped</td>
<td>0</td>
</tr>
<tr>
<td>Windows with lead free friction surfaces</td>
<td>1</td>
<td>Encapsulated (MDE approved material)</td>
<td>0</td>
</tr>
<tr>
<td>Casement</td>
<td>0</td>
<td>WINDOW WELLS</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>Capped (as applicable)</td>
<td>1</td>
</tr>
</tbody>
</table>

In accordance with COMAR 26.16.02.03, all untested window wells where lead based paint or untested paint exists are capped, repaint, replaced or encapsulated. (Attach XRF results for tested sills.)

Top sash of untested or non-replacement windows have been fixed to eliminate friction. (Subject to Federal, State and Local Codes.)

The unit is free of visible dust, debris or residue. Does not hang to prevent the rubbing together of a lead surface.

 Doors have been re-hung to prevent the rubbing together of a lead painted surface with another surface.

All window sills where lead based paint or untested paint exists have been repainted, replaced or encapsulated. (Attach XRF results for tested sills.)

All kitchen and bathroom floors are overlaid with smooth, water resistant covering.

The unit is free of visible dust, debris or residue. HEPA-vacuuming and detergent washing have been done in rooms where repairs were made.

Comments: Local fire codes prohibit fixing top sash in place.

Accredited Inspection Contractor’s Name: Plumbee’s
Plumbee’s
Accreditation No.: 53585
Accreditation Expiration Date: 04/11/2012
Accredited Inspector’s Name: Bob Plumbee
Bob Plumbee
Accreditation No.: 53586
Accreditation Expiration Date: 04/11/2012
Accredited inspection’s Signature: Bob Plumbee
Date: 11/09/2011
FORM C - DUST INSPECTION

VISUAL REVIEW / DUST SAMPLE COLLECTION & ANALYSIS

The lead paint inspection contractor inspector is to submit a copy of the Lead Paint Risk Reduction Inspection Certificate (Form 350), with this Form C which includes the diagram, a copy of the lab results to Maryland Department of the Environment and the property owner within 19 CALENDAR DAYS following the inspection. This form must be fully completed and accurate or the Inspection Certificate may be invalid. (See 25-10.02 and 25-10.05.)

MDE Tracking No.: 0551151
Date of Inspection: 01 / 01 / 2018
Inspection Certificate No.: 999888

Address of Property Inspected:
112 Main Street
City: Hampstead
Zip Code: 21074
County: Carroll

Date of Lab Report: 01 / 01 / 2018
Date Lab Report was Received by Inspector: 01 / 01 / 2018

PART I - VISUAL REVIEW

Visually review all interior and exterior painted surfaces of unit for chipping, peeling, or flaking paint. If chipping, peeling, or flaking paint is found, corrections must be made before dust samples may be collected. Exterior corrections may be delayed if interior paint condition is satisfactory and an Exterior Waiver is approved.

Is Condition of Paint Satisfactory? (circle one in each column) Interior Yes No Exterior Yes No

Is an Exterior Waiver being used? (circle one) Yes No

If Yes, this certificate expires on 04/30/2018. The property must be re-inspected no later than this date or this inspection certificate will no longer be valid. Name of the supervising agency or official for the exterior Waiver: Carroll County. Form C with the Supervisor’s Statement of Work must be submitted to MDE and the property owner by the lead inspector.

PART II - DIAGRAM

On a separate sheet of paper, provide a diagram of the unit. The diagram is to include: the full site address, street(s) adjacent to the outside entry with the street name(s), location of the unit within a multi-unit property if applicable, window and doorway locations, assigned room numbers, and locations of where dust samples were taken. Each room within the unit and number each. Your numbering system on your diagram must match Part III of this form. Note locations of windows with a “W” and sampling locations with an “X”. Attach the diagram to this form.

PART III - DUST COLLECTION & ANALYSIS

After collection of samples in a room, enter the total number of samples that were taken in that room. Attach additional pages of page 2 of this form if there are more rooms than can accommodate on the back of this form. The “Meets Standard” column requires circling a Yes or No. Under Maryland law, the Lead Risk Reduction Standard for dust is...
Form D – Re-inspection

Type of Re-inspection

- **Exterior Waiver**
  - Must have SSW

- **Limited Lead Free**
  - SSW only when defective paint is corrected

- **Failed Dust Wipes**
  - Attach Form C
  - Laboratory Report
Form E – Lead Free

Form E has 3 Parts!!!

1. The Summary Report

FORM E- LEAD-FREE INSPECTION SUMMARY REPORT

<table>
<thead>
<tr>
<th>MDE TRACKING #</th>
<th>CERTIFICATE #</th>
<th>INSPECTOR ACCRED #</th>
<th>INSPECTOR NAME (PRINTED)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0555999</td>
<td>999888</td>
<td>55999</td>
<td>Robert Bob</td>
</tr>
</tbody>
</table>

MDE PROPERTY #: 03-121214
SITE ADDRESS (INCLUDE STREET NUMBER, NAME, TOWN, AND ZIP CODE): 112 Main St. Hampstead 21522
INSPEC. CONTRACTOR ACCRED #: 55988
INSPEC. CONTRACTOR NAME (PRINTED): Bob’s Inspections

INSTRUCTIONS: It is the inspector’s responsibility to ensure that this form is complete and correct. The inspector must secure Tracking # and Property # from MDE (if not known by the owner) prior to submitting. This form is to be submitted to MDE and property owner with the Inspection Certificate. Other attachment forms may apply. The owner is responsible for $10.00 per unit Lead-Free processing fee. The inspector shall advise the owner of their responsibility in that regard and supply the property owner with the Fee Payment form. Please note, in accordance with COMAR 26.16.02.05M, the inspection contractor must maintain a full report of inspection results for five years after the issuance of the certificate.

SECTION 1. Interior Surfaces:
If multunit building or multbuilding complex is being certified as Lead-Free under this certificate # then, the “Form E - Appendix” must be submitted.

Total # of Units this Certificate Applies to: 50
Total # of Paint Chip Samples Collected: 10

SECTION 2. Exterior Surfaces (Includes Common Areas):

□ OPTION A (one time only): Exterior is Lead-Free, satisfactory result requires no further action.
□ OPTION B (limited): Exterior is not Lead-Free but free of any chipping peeling or flaking paint. Must be reinspected within two years or before 05 / 01 / 2020 or the certificate is expired.

Total # of XRF Readings: 4,908
Total # of Inconclusive XRF Readings: 25
Total # of Paint Chip Samples Collected: 10

SECTION 3. Factory Applied Coatings on Metal Components:
CIRCLE ONE: YES ☐ NO ☐

Robert Bob
Inspector’s Signature

Date Certified Lead-Free: Month (00) / Date (00) / Year (0000)
2. The Appendix (unit list)

<table>
<thead>
<tr>
<th>Street Number</th>
<th>Street Name</th>
<th>Unit Number</th>
<th>City, State, Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

3. The Fee Payment

FORM E - LEAD-FREE INSPECTION FEE PAYMENT FORM

<table>
<thead>
<tr>
<th>MDE Tracking #</th>
<th>Certificate #</th>
<th>End Accepted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

PROPERTY #:  

INSTRUCTIONS: It is the inspector’s responsibility to ensure that this form is complete and correct before giving it to the property owner. Prior to submitting the inspect, the inspector must complete the owner information below if it is the building owner or if it is not known by the owner. Do not submit anything else. The owner is responsible for paying a $10.00 per unit processing fee. The inspect shall provide the owner of their responsibility in the regular supply of the property owner with this Payment Form. NOTE: In accordance with the Maryland Environmental Article 59 - 843 (a)(10), the owner is responsible for sending a $10.00 per unit processing fee for submission of a Lead-Free inspection report. Section 6 - 843 (g) provides that the property for failure to pay the required fee by the law is a civil penalty of up to the amount of the unpaid fee together with all costs of collections, including attorney’s fees. If a MULTIHUNT BUILDING OR MULTIBUILDING COMPLEX IS BEING CERTIFIED AS LEAD-FREE UNDER THIS CERTIFICATE # YIELD, A COPY OF FORM E APPENDIX MUST BE FILLED WITH THIS “FORM E-PayM”. This will reduce the inspection fee per unit.

FEES PAYMENT (Inspector must complete this section)

<table>
<thead>
<tr>
<th>MDE Tracking #</th>
<th>Certificate #</th>
<th>End Accepted</th>
<th>TOTAL # of units certified Lead-Free</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Processing Fee per unit $10.00</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>TOTAL PAYMENT DUE to be Submitted</td>
</tr>
</tbody>
</table>

Return the completed form and payment to:

MARYLAND DEPARTMENT OF THE ENVIRONMENT
P.O. BOX 1417
BALTIMORE, MD 21203

The following information is required ONLY if there is no MDE Tracking # above. Our MDE Tracking by calling 1-800-922-6702 and 1-800-922-3286. The inspector must complete this section. If any question does not apply, mark N/A.

<table>
<thead>
<tr>
<th>Owner Name</th>
<th>Lead Free #</th>
</tr>
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<tbody>
<tr>
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<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>City, State, Zip Code</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
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<table>
<thead>
<tr>
<th>Phone Number</th>
<th>Fax Number</th>
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</tbody>
</table>
Pitfall # 6
Risk Reduction Gone Wild

Modified Risk Reduction which came first:

The incomplete inspection?

or

The incomplete paperwork?
Full vs. Modified Risk Reduction

- Meet FRR Standards with:
  - A visual review of all interior and exterior surfaces (for peeling, chipping and flaking paint).
  - A dust wipe test.

- Forms: A, 330, C, Diagram, Labs

- Meet MRR Standards with:
  - A visual review of all interior and exterior surfaces (for peeling, chipping and flaking paint).
  - A dust wipe test.
  - Lead Risk Reduction Treatments
  - Visual Inspection

- Forms: A, B, SSW, 330, C, Diagram, Labs
<table>
<thead>
<tr>
<th>Full vs. Modified Risk Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Full Risk Reduction</strong></td>
</tr>
<tr>
<td>• Required for:</td>
</tr>
<tr>
<td>– Tenant Turnover</td>
</tr>
<tr>
<td>– New Rental</td>
</tr>
<tr>
<td>• FRR is the lower standard.</td>
</tr>
<tr>
<td><strong>Modified Risk Reduction</strong></td>
</tr>
<tr>
<td>• Required in response to:</td>
</tr>
<tr>
<td>– Notice of Defect</td>
</tr>
<tr>
<td>– Notice of Elevated Blood</td>
</tr>
<tr>
<td>– Lead Level</td>
</tr>
<tr>
<td>– Abatement Order (Balt. City)</td>
</tr>
<tr>
<td>• MRR is the higher standard.</td>
</tr>
</tbody>
</table>
Modified Risk Reduction (MRR)

**Current**

- Required in response to:
  - Notice of Defect
  - Abatement Order (Balt. City)
  - Notice of Elevated Blood Lead Level only

**New Starting July 1, 2020**

- Required in response to:
  - Notice of Defect
  - Abatement Order (Balt. City)
  - Notice of Elevated Blood Lead Level, and a defect found during an environmental investigation.
Pitfall # 5
Problems with Lead Free

• Fail to perform all of the calibrations checks
  – 3 at start, 3 at finish, 3 at least every 4 hours

• Missing testing combinations & components

• All units are not lead free

• Missing component type summary
  – For Multi-family inspections using random sampling
  – Test at least 40 or all of a component type.
• Form 330 incorrectly marked Lead Free (LF) or Limited Lead Free (LLF).

• Cannot upgrade a LLF to Lead Free
  – Must issue a new certificate and pay fees.

• Perform Clearance testing after abatement.

• Complete all pages of the Form E
Pitfall # 4
Errors in Dust Sampling

• Forget to do blank dust samples
  – At least 5% per day (1 out of 20), or at least 1 per day, whichever is greater

• Collects the wrong number and type of sample.
  – No window – floor sample
  – Lead free windows – floor or sill sample
  – Non Lead Free windows – 2 samples
    • Always a well sample
    • Plus another sample from the floor or sill
Pitfall #3
Passing Defective Paint

• Passing an inspection with defective paint present
  – Not identifying peeling, chipping and flaking
  – Low lighting
  – Not checking behind curtains and belongings

• Trusting others
  – Taking the landlord’s word that they will fix the paint
  – Collecting dust samples prior to paint stabilization
Examples Defective Paint
Examples Defective Paint
Examples Defective Paint
Examples Defective Paint
Pitfall # 2
Training and Accreditation Errors

• Letting your accreditation lapse
  – Not taking refresher training in time
  – Not submitting complete applications in time

• Leaving training and not doing homework
  – Never reading your training manual
  – Never reading the regulations
    • Code of Maryland Regulations (COMAR)
    • MD Environment Article, Title 6, Subtitle 8
    • HUD Guidelines – Chapter 7 and others
    • EPA 40 CFR 745
Pitfall #1
Not Asking For Help

Call us if you are unsure about anything.

410-537-3825

Ask for the inspector on Duty
Common Pitfalls of Lead Abatement

Jason Yu, Section Head, Lead Oversight Section
MDE’s Regulatory Authority

- COMAR 26.16.01.04I – The Department has the right to perform oversight inspections and audits of all lead paint abatement services and related training.

- Environment Article § 6-851(a) – Audit of verification. – The Department may audit, through a spot check or other investigation, the verification of work performed pursuant to § 6-819(g) of this subtitle.

- Environmental Article § 6-852(a) – Authority of Department – The Department may, at any time, spot check affected properties that have been reported as satisfying the risk reduction standard or verified as satisfying the modified risk reduction standard.
MDE’s Oversight of Abatement Contractors

• Respond to work practice complaints received from tenants, property owners, neighbors, and other government agencies

• Respond to Lead Abatement Project Notifications received from MDE-accredited lead abatement contractors and conduct an audit
Common Pitfalls – Accreditation/Training

- Unaccredited supervisor (COMAR 26.16.01.04A(1))
- Untrained worker (COMAR 26.16.01.04A(1))
- Does not physically possess at the work site current accreditation certificate or training ID card (COMAR 26.16.01.19A(7))
• If occupied unit:
  – Occupants/tenants not removed from the work area (COMAR 26.16.01.11C(5))
  – Work area not sealed off from rest of the unit (COMAR 26.16.01.11C(6)(f))
  – Persons at risk (children < 6 years and pregnant women) not removed from the property (COMAR 26.16.01.11C(5))
Common Pitfalls – Caution Signs

• Caution signs are not posted in a visible location at each entrance to the work area (COMAR 26.16.01.11C(6)(b) and COMAR 26.02.07.07A)
Common Pitfalls – Containment

• Floors not covered with plastic sheeting (6 mil thick for permanent removal of lead-based paint; 4 mil thick for risk reduction) and secured in place (COMAR 26.16.01.11C(6)(j); COMAR 26.02.07B(1)(b))

• Nonmovable objects e.g. radiators, appliances, heavy furniture not covered with plastic sheeting (COMAR 26.16.01.11C(6)(f); COMAR 26.02.07.07B(1)(d))

• Not sealing off kitchen cabinets, cupboards, etc. to keep the dust out (COMAR 26.16.01.11C(6)(g); COMAR 26.02.07.07B(1)(c))
Common Pitfalls – Containment
Common Pitfalls – Containment
Common Pitfalls – Containment
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Common Pitfalls – Ventilation Not Shut Down

- Ventilation not shut down and vents not covered (COMAR 26.16.01.11C(6)(k) and COMAR 26.02.07.07B(f))
• Using an improper abatement method such as dry scraping and dry sanding (COMAR 26.16.01.11C(3) and COMAR 26.02.07.03A)
Common Pitfalls – Improper Abatement Method
Common Pitfalls – Improper Abatement Method
Common Pitfalls – Improper Abatement Method
Common Pitfalls – Improper Cleanup

• Improper post-abatement e.g. dry sweeping or using shop vacuum without a HEPA filtration system (COMAR 26.16.01.12F)

Remember: For permanent abatement (removal, replacement, or enclosure of lead-based paint) in the interior, “HEPA sandwich” is required (COMAR 26.02.07A)
Common Pitfalls – Improper Cleanup
• Waste not removed from the property in a timely manner i.e. within 72 hours in an occupied unit, within 48 hours if permanent removal of lead-based paint (COMAR 26.16.01.11C(9)(a) and COMAR 26.02.07.09A)

• Non-liquid waste not deposited in plastic bags (6 mil thick for permanent removal; 4 mil thick for risk reduction) and sealed (COMAR 26.16.01.11C(8)(a) and COMAR 26.02.07.08A(1))
Common Pitfalls – Improper Waste Disposal
• Waste not properly transported, creating an airborne hazard (COMAR 26.16.01.11C(9)(b) and COMAR 26.02.07.09B)
• Liquid waste containing lead-based paint or presumed lead-based paint must be specially handled. Refer to COMAR 26.13.03 for guidance.
• All workers/supervisors must be protected from potential lead exposure

• OSHA’s Lead in Construction Standard (40 CFR §1926.62) covers all work where an employee may be exposed to lead

• Persons not covered by Lead in Construction Standard must wear depending on the project: disposable clothing, shoe covers, and a half-mask respirator with a HEPA filter (COMAR 26.16.01.11C(6)(e) and COMAR 26.02.07.04)
Common Pitfalls – PPE / Worker Safety
Common Pitfalls – PPE / Worker Safety
• Food and drink at the work site (40 CFR §1926.62(i)(1))

• Smoking at the work site (40 CFR §1926.62(i)(1))
Common Pitfalls – Failing to Notify MDE

- Failing to notify MDE of an upcoming project by submitting a *Lead Abatement Project Notification Form* at least 24 hours (but not more than 10 days) before beginning the project

(COMAR 26.16.01.11A-1)
Questions?
Thank you for attending the 2019 Inspection and Contractor Forum!!