



Maryland
Department of
the Environment

Welcome to the 2019 Inspectors and Contractors Forum



Maryland Department of the Environment Lead Poisoning Prevention Program History and Highlights





History of Maryland's Lead Law

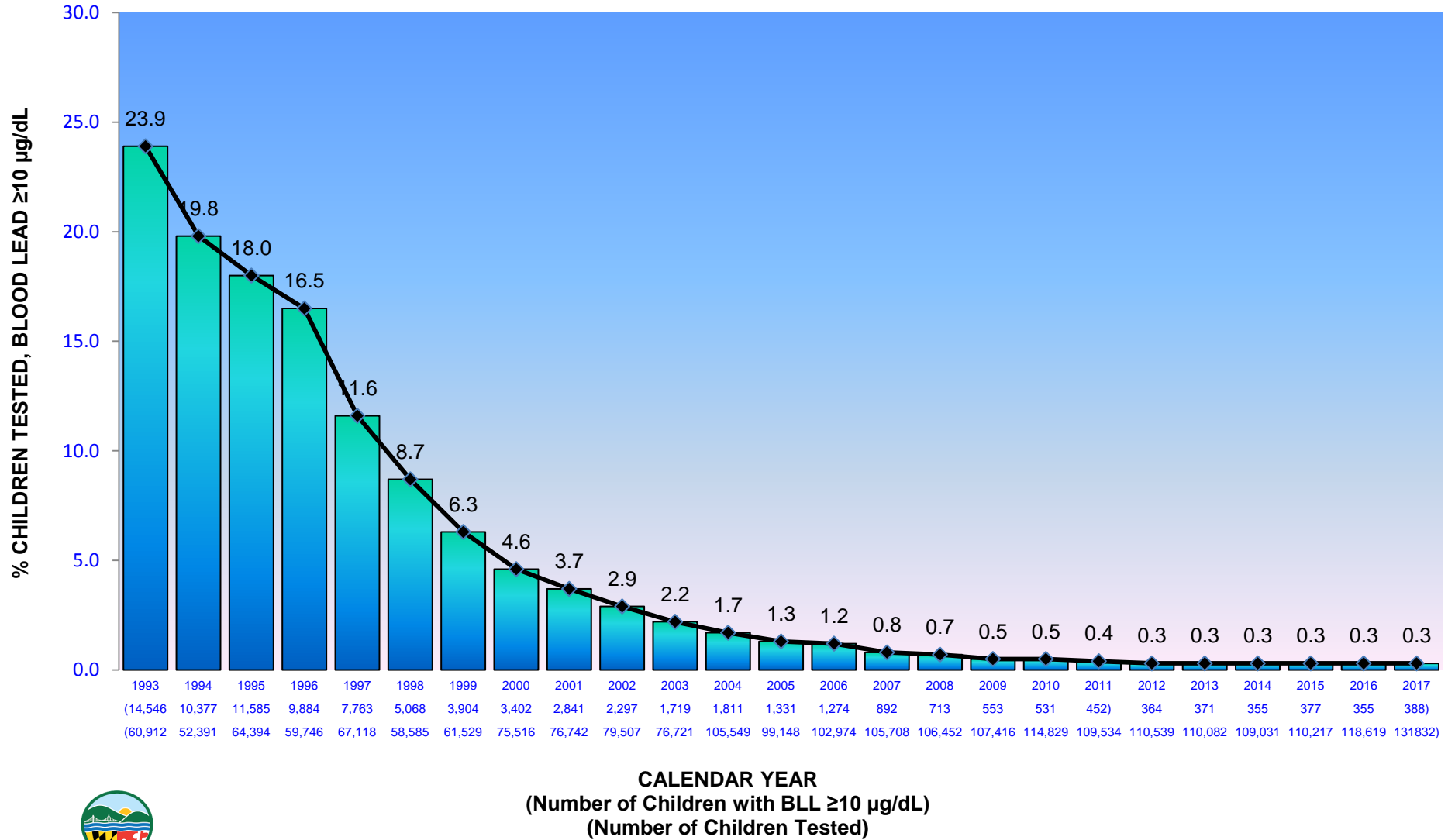
- **1993-** Over 14,000 children with a blood lead level above 10 $\mu\text{g}/\text{dl}$ in Maryland
- **1994:** Reduction of Lead Risk in Housing Law enacted;
- **1996:** Implementing regulations adopted
- **2000:** Governor's Initiative to increase compliance, blood lead testing, and improvements 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 $\mu\text{g}/\text{dl}$ (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 $\mu\text{g}/\text{dl}$ 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





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 $\geq 10\mu\text{g}/\text{dL}$ increased from 355 in CY 2016 to 388 in CY 2017.
- However, the overall number of children identified with blood lead levels of $\geq 5\mu\text{g}/\text{dL}$ decreased from 2,084 in CY 2016 to 2,049 in CY 2017.





Lead Case Management Maryland

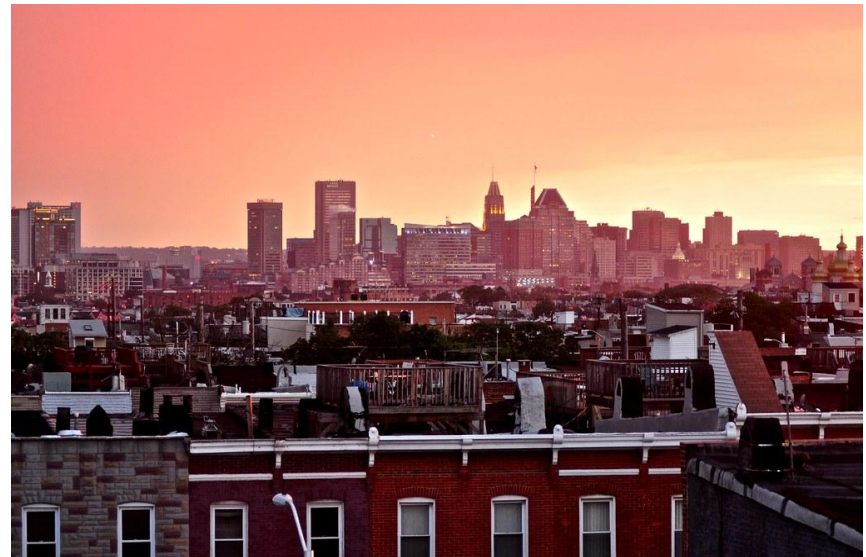
- MDE Case Management Guidelines (“Guidelines”) require medical case management when a child aged 0-72 months is identified with a first time venous or two capillary blood lead tests of ≥ 10 $\mu\text{g}/\text{dL}$ (“Confirmed Case”).
- During CY 2016, the Department began comprehensively tracking sources 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 $\mu\text{g}/\text{dL}$ (“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.





Confirmed Cases CY 2017 Baltimore City

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.

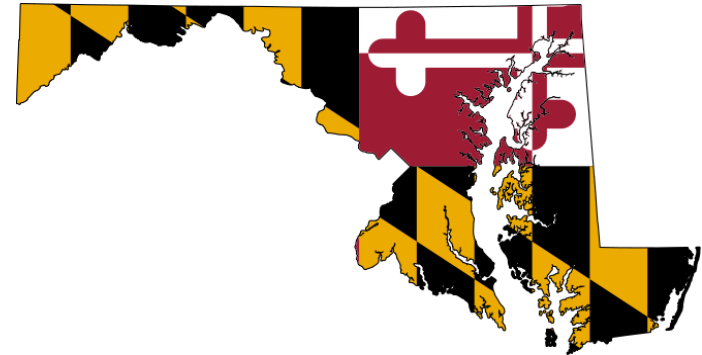




Lead Case Management Outcomes Other Maryland Counties

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 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

Occupancy Type	Pre-1950	1950-1977	Post 1977	Total Cases (179)
Rental Property	15 (8.4%)	81 (45.2%)	18 (10.1%)	114 (63.7%)
Owner Occupied	25 (14%)	14 (7.8%)	26 (14.5%)	65 (36.3%)





Source Overview

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.



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.
- 25 were Unknown or Unable to Determine.





Current Initiatives

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.





Maryland
Department of
the Environment

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.”





Team Work: The Benefits of Compliance Assistance

In order for us to achieve our mission, we need you! And,





Team Work: The Benefits of Compliance Assistance

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

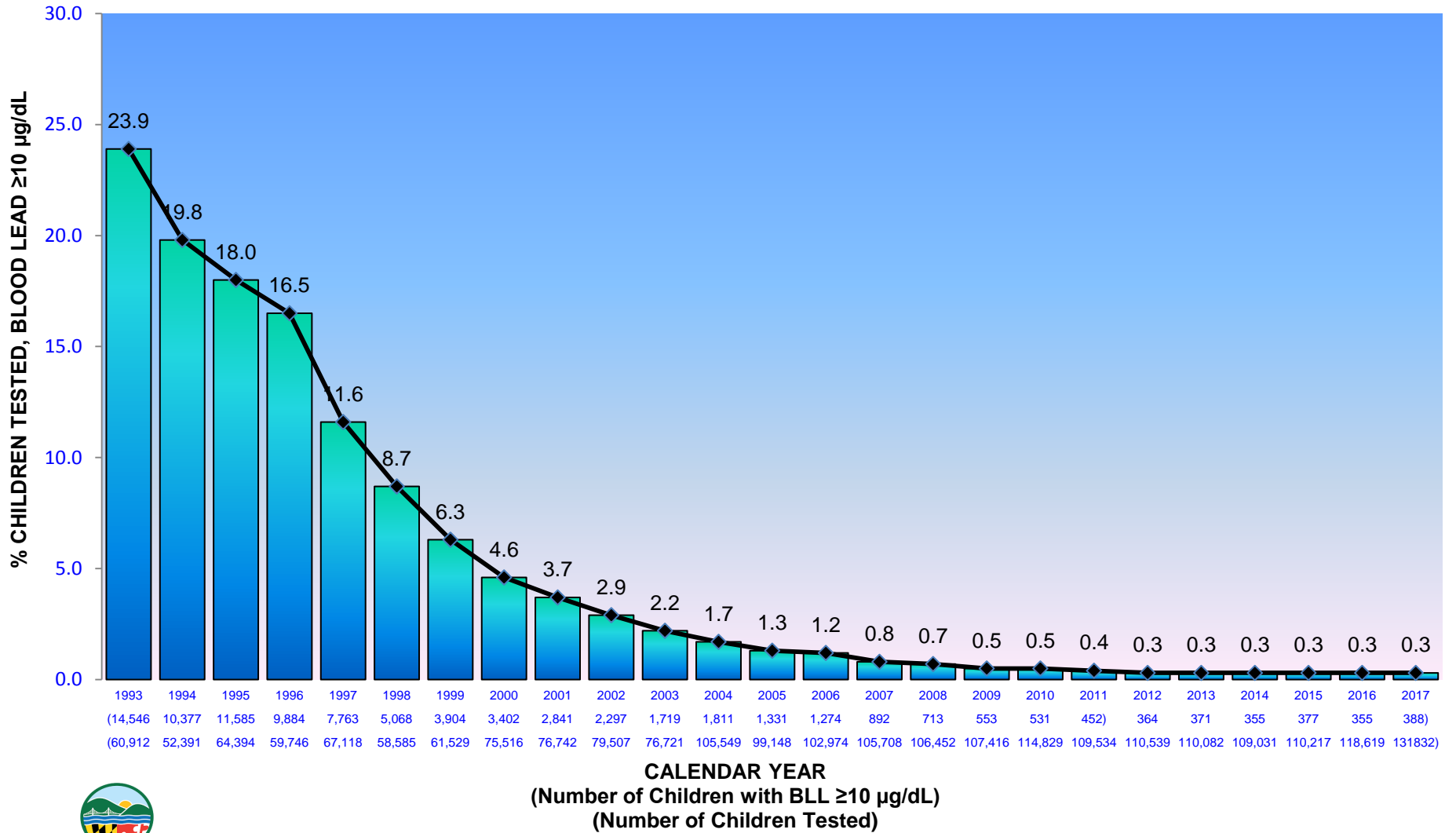




Team Work: The Benefits of Compliance Assistance

And, we worked together to achieve this important result:

MARYLAND DEPARTMENT OF THE ENVIRONMENT
 CHILDHOOD LEAD SURVEILLANCE
 STATEWIDE: 1993-2017





Team Work: The Benefits of Compliance Assistance

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*)



Team Work: The Benefits of Compliance Assistance

**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



Team Work: The Benefits of Compliance Assistance

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



Team Work: The Benefits of Compliance Assistance

A Win-Win Situation

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”)



Team Work: The Benefits of Compliance Assistance

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



Team Work: The Benefits of Compliance Assistance

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



Team Work: The Benefits of Compliance Assistance

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**



Team Work: The Benefits of Compliance Assistance

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





Team Work: The Benefits of Compliance Assistance





Team Work: The Benefits of Compliance Assistance

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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 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



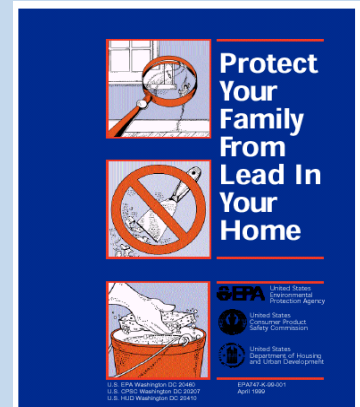
- Register each property listing all units
- Renew registration annually
- Online Registration – www.mde.state.md.us



§§ 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.

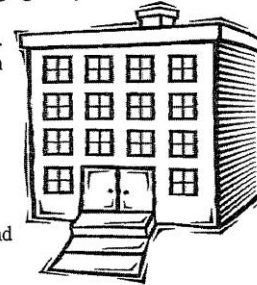
This Notice of Tenant's Rights provides a detailed explanation of what property owners are required to do to comply with the law, how to inform your landlord that repairs need to be performed in your home, and steps you can take to enforce your legal rights if your landlord refuses to respond to your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

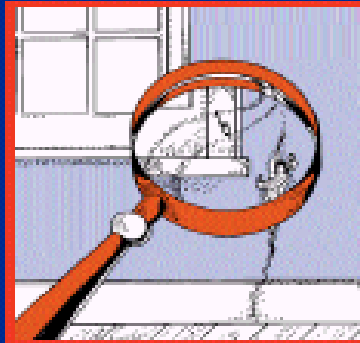
Please read this material carefully and call the Lead Hotline at 410-537-4199 or 800-776-2706 if you have any questions. (TTY Users 800-735-2258)

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 wells, 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



 United States
Environmental
Protection Agency

 United States
Consumer Product
Safety Commission

 United States
Department of Housing
and Urban Development

U.S. EPA Washington DC 20460
U.S. CPSC Washington DC 20207
U.S. HUD Washington DC 20410

EPA747-K-99-001
April 1999

TYPES OF RISK REDUCTION CERTIFICATES

- Lead Free
- Limited Lead Free
- Full Risk Reduction
- Modified Risk Reduction



MARYLAND DEPARTMENT OF THE ENVIRONMENT
LEAD PAINT RISK REDUCTION INSPECTION CERTIFICATE NO. 243501

NOTE: This inspection certificate is not valid unless it contains the Owner's name.

OWNER # _____ SIDE PROPERTY # _____ OWNER NAME _____

Property Street Address _____ Unit # _____ City _____ County _____ Zip _____

The inspector must select inspection category 1, 2, 3, or 4. **ONLY one.** Also select appropriate option or method chosen or used. The following attachments are required: Visual Review/ Dust Sampling, Form C: Visual Inspection, Form B: Lead Free, Form R: Professional certification are mailed pursuant to a waiver for exterior work for a specific time frame and will be invalid after the expiration date. The Inspection Certificate No. must be referenced on all forms submitted.

1. Lead Free		2. Full Risk Reduction		3. Modified Risk Reduction		4. Lead Safe	
<input type="checkbox"/> Option A: One Time Only (09)	<input type="checkbox"/> A. Visual Review (interior & exterior)/ Dust Sampling (09)	<input type="checkbox"/> B. Visual Inspection (interior & exterior) (09)	<input type="checkbox"/> C. Exterior Waiver (09)	<input type="checkbox"/> D. Exterior Waiver (09)	<input type="checkbox"/> E. Visual Inspection (interior & exterior) / Dust Sampling (09)	<input type="checkbox"/> F. Visual Inspection (interior & exterior) / Dust Sampling (09)	<input type="checkbox"/> G. Exterior Waiver (09)
<input type="checkbox"/> Option B: Lead Free Certification Required by _____ Expiration Date: 04/01/____	<input type="checkbox"/> A. Visual Review (interior & exterior) / Dust Sampling (09)	<input type="checkbox"/> B. Visual Inspection (interior & exterior) (09)	<input type="checkbox"/> C. Exterior Waiver (09)	<input type="checkbox"/> D. Exterior Waiver (09)	<input type="checkbox"/> E. Visual Inspection (interior & exterior) / Dust Sampling (09)	<input type="checkbox"/> F. Visual Inspection (interior & exterior) / Dust Sampling (09)	<input type="checkbox"/> G. Exterior Waiver (09)

PASS Based on the findings of the attached inspection report(s), I certify that the property/unit meets the certification criteria at this time.
(tick other property to use in operations)

FAIL Based on the findings of the attached inspection report(s), the property/unit fails to meet certification criteria at this time.
(tick other property to use in operations)

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 Maryland.

Inspector's Name (printed) _____ Inspector's Signature _____ Accreditation No. _____ Inspection Company _____ Accreditation No. _____

MDP-330 (Revised 5/02) (Copy distribution: original to owner; yellow to MDE; pink to owner; green/red to inspection company)

When Does an Owner have to meet the Modified Risk Reduction Standard?

Triggers for Modified Risk Reduction

- Notice of Child with a EBL ≥ 10 $\mu\text{g}/\text{dL}$.
- Notice of Defect from any source.



§ 6-819

Notice Of Defect

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.

From:

Name of Tenant

Street Address and Unit#

 City State Zipcode

 Telephone - Day Telephone-Evening

CHIPPING, PEELING, FLAKING PAINT

This room, _____ has chipping, peeling, or flaking paint on the: <input type="checkbox"/> Walls/ceiling <input type="checkbox"/> Window sills <input type="checkbox"/> Window wells <input type="checkbox"/> Window frames <input type="checkbox"/> Porch <input type="checkbox"/> Door/door frame	This room, _____ has chipping, peeling, or flaking paint on the: <input type="checkbox"/> Walls/ceiling <input type="checkbox"/> Window sills <input type="checkbox"/> Window wells <input type="checkbox"/> Window frames <input type="checkbox"/> Porch <input type="checkbox"/> Door/door frame	This room, _____ has chipping, peeling, or flaking paint on the: <input type="checkbox"/> Walls/ceiling <input type="checkbox"/> Window sills <input type="checkbox"/> Window wells <input type="checkbox"/> Window frames <input type="checkbox"/> Porch <input type="checkbox"/> Door/door frame	This room, _____ has chipping, peeling, or flaking paint on the: <input type="checkbox"/> Walls/ceiling <input type="checkbox"/> Window sills <input type="checkbox"/> Window wells <input type="checkbox"/> Window frames <input type="checkbox"/> Porch <input type="checkbox"/> Door/door frame
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STRUCTURAL DEFECTS

This area, _____ has the following structural defects: <input type="checkbox"/> Leaking ceiling <input type="checkbox"/> Leaking roof <input type="checkbox"/> Leaking plumbing <input type="checkbox"/> Other _____ _____ _____	This area, _____ has the following structural defects: <input type="checkbox"/> Leaking ceiling <input type="checkbox"/> Leaking roof <input type="checkbox"/> Leaking plumbing <input type="checkbox"/> Other _____ _____ _____	This area, _____ has the following structural defects: <input type="checkbox"/> Leaking ceiling <input type="checkbox"/> Leaking roof <input type="checkbox"/> Leaking plumbing <input type="checkbox"/> Other _____ _____ _____	This area, _____ has the following structural defects: <input type="checkbox"/> Leaking ceiling <input type="checkbox"/> Leaking roof <input type="checkbox"/> Leaking plumbing <input type="checkbox"/> Other _____ _____ _____
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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

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.

Property Owner	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 24 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, and 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.

Person at Risk	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 insurer of the owner, (ii) A medical doctor or other health professional with whom the owner consults, or (iii) An attorney 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 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 nondisclosure of the test results. (c) **Penalties.** – A person who violates the provisions of this section is subject to the penalties provided in § 4-309 of the Health – General Article.

Received by: _____ **Date:** _____
Signature of Landlord or Property Owner (Third-Party Delivering)

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

MDE TRACKING NO. _____ MDE PROPERTY NO. (Include county code prefix.) _____ OWNER NAME _____

Street Address _____ Unit No. _____ City _____ Zip Code _____ County _____ Property Construction Date _____

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 "00/00/00" 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

<input type="checkbox"/> 1. Lead Free	<input type="checkbox"/> 2. Full Risk Reduction	<input type="checkbox"/> 3. Modified Risk Reduction	<input type="checkbox"/> 5. Lead Safe
Methods	Methods	Methods	Methods
<input type="checkbox"/> A. One Time Only <i>(Interior & Exterior)</i> OR <input type="checkbox"/> B. Limited <i>(Interior Lead Free Only)</i> Passing Re-inspection required no later than: _____/_____/_____ _____ Number of Pre-1950 Lead Free Units _____ Number of Post-1949 Lead Free Units	<input type="checkbox"/> A. Dust Inspection OR <input type="checkbox"/> D. Dust Inspection with Exterior Waiver Passing Re-inspection (Form C and Supervisor's Statement of Work) required no later than 04/30/____ unless otherwise noted in local code. <input type="checkbox"/> E. Dust Inspection with Lead Free Exterior	<input type="checkbox"/> B. Visual Inspection and Dust Inspection OR <input type="checkbox"/> C. Visual Inspection and Dust Inspection with Exterior Waiver Passing Re-inspection (Form D and Supervisor's Statement of Work) required no later than 04/30/____ unless otherwise noted in local code. OR <input type="checkbox"/> D. Visual Inspection and Dust Inspection with Lead Free Exterior	<input type="checkbox"/> A. Dust Inspection OR <input type="checkbox"/> B. Dust Inspection and Visual Inspection OR <input type="checkbox"/> C. Dust Inspection with Lead Free Exterior OR <input type="checkbox"/> D. Dust Inspection and Visual Inspection with Lead Free Exterior AND Verification that windows are lead free or have been treated so friction surfaces are lead free.

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 _____

Issuance of Abatement Orders

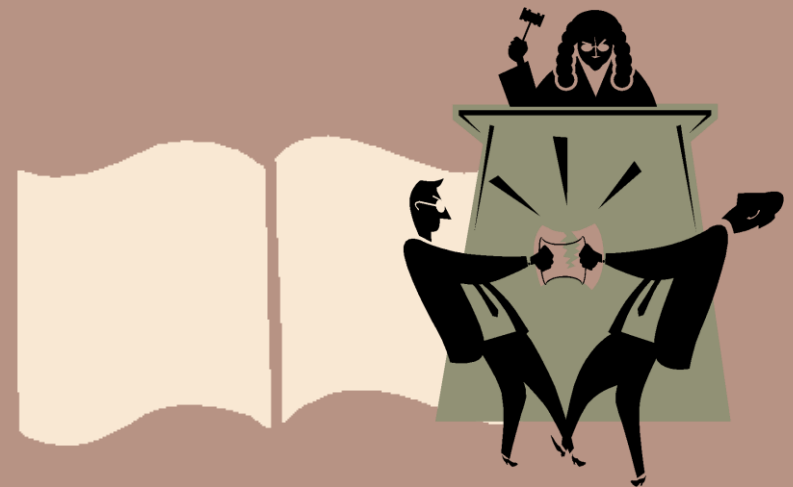
§ 6-822

- 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.



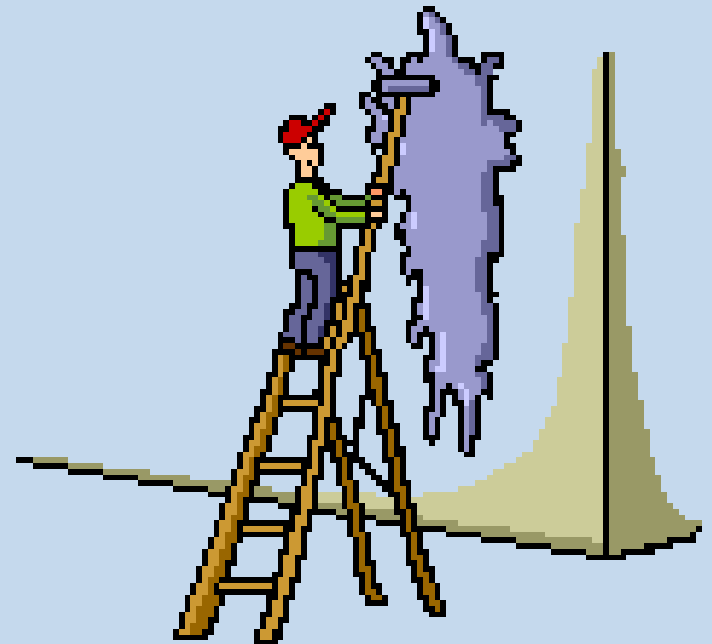
Title 6, Subtitle 10
of the
Environment Article

“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.



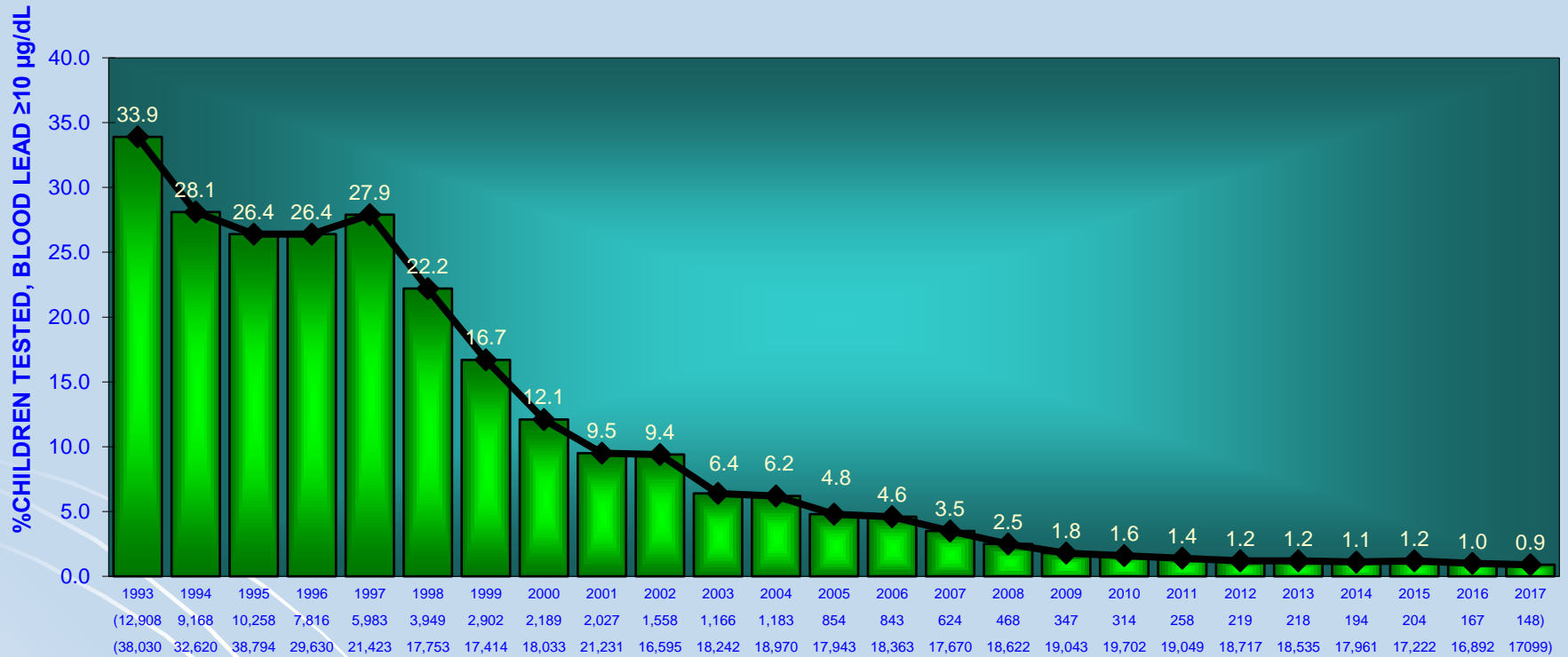
Authority to Order Compliance & Issue Penalties

- 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



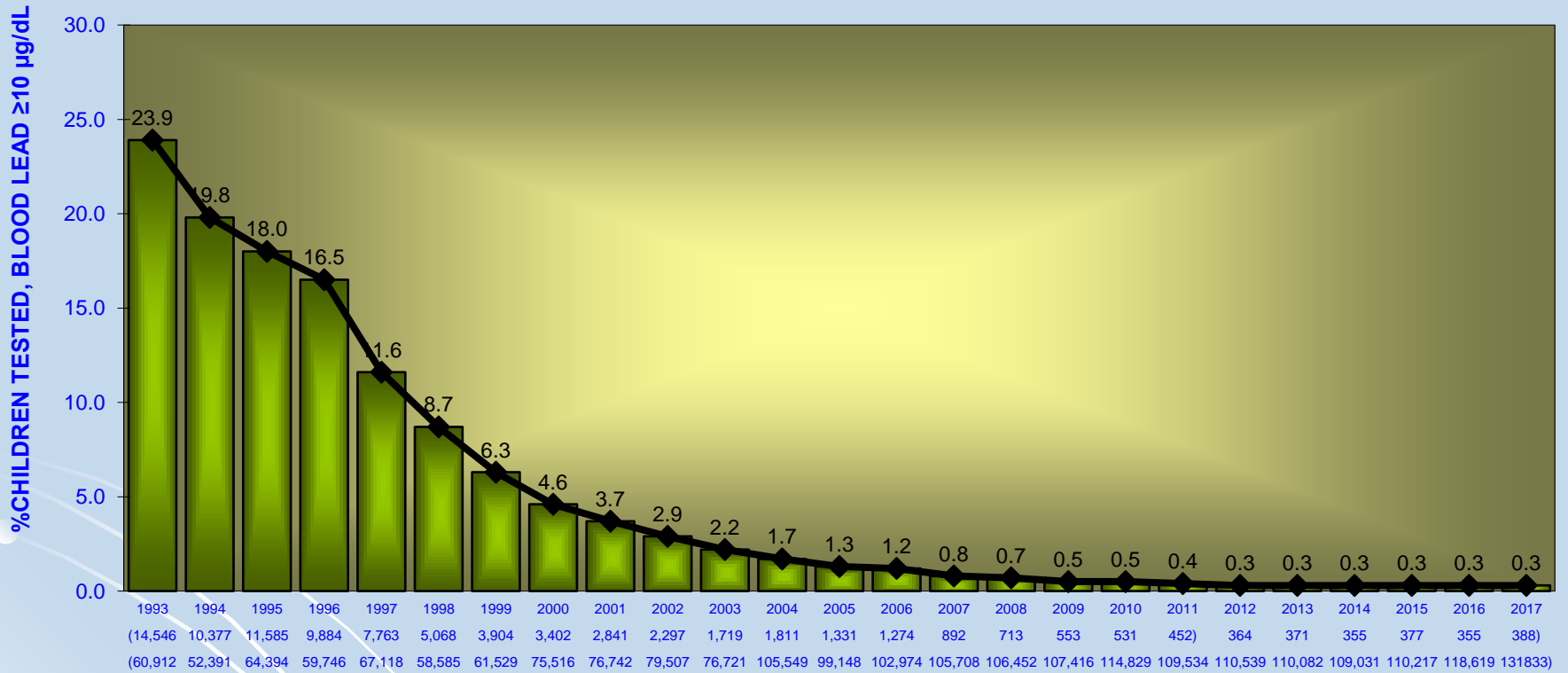
MARYLAND DEPARTMENT OF THE ENVIRONMENT
 CHILDHOOD BLOOD LEAD SURVEILLANCE
 BALTIMORE CITY: 1993-2017



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



MARYLAND DEPARTMENT OF THE ENVIRONMENT CHILDHOOD BLOOD LEAD SURVEILLANCE STATEWIDE 1993-2017



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



Maryland Healthy Children Act House Bill 1233 (2019)

- Adopts CDC Reference Level
 - Currently 5 $\mu\text{g}/\text{dL}$
- 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





Maryland
Department of
the Environment

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**



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

INSPECTION NOTIFICATION

- Inspection Contractor/Inspector is to fax this form to 410-537-3156 or email to 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.

Inspection Contractor Name:		Accreditation No.:	Accreditation Expiration Date:
Inspector Name:	Phone Number:	Accreditation No.:	Accreditation Expiration Date:

INSPECTION CATEGORY (mark one category for each entry)						INSPECTION INFO.				PROPERTY OWNER/CONTACT
	Lead Free	Full Risk	Modified	Clearance	Risk Assessment	Date	Time	Full Address (include unit number, if any)	County	Name & Phone No.
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					



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

MARYLAND DEPARTMENT OF THE ENVIRONMENT **5555XXX**

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

0911111 **03 - 1200000001152** **Main Street Magic, LLC**

MDE TRACKING NO. MDE PROPERTY NO. (Include county code prefix.) OWNER NAME

112 Main Street **112:A** **Baltimore** **21201** **Balt. City** **0000**

Street Address Unit No. City Zip Code County Property Construction Date

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 supporting documents 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 "0000" 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

<input type="checkbox"/> 1. Lead Free Methods <input type="checkbox"/> A. One Time Only (Interior & Exterior) OR <input type="checkbox"/> B. Limited (Interior Lead Free Only) Passing Re-inspection required no later than: ___/___/___ ___ Number of Pre-1950 Lead Free Units ___ Number of Post-1949 Lead Free Units	<input checked="" type="checkbox"/> 2. Full Risk Reduction Methods <input checked="" type="checkbox"/> A. Dust Inspection OR <input type="checkbox"/> D. Dust Inspection with Exterior Waiver Passing Re-inspection (Form D and Supervisor Statement of Work) required no later than 04 / 30 / ___ unless otherwise noted in local code. OR <input type="checkbox"/> E. Dust Inspection with Lead Free Exterior	<input type="checkbox"/> 3. Modified Risk Reduction Methods <input type="checkbox"/> B. Visual Inspection and Dust Inspection OR <input type="checkbox"/> C. Visual Inspection and Dust Inspection with Exterior Waiver Passing Re-inspection (Form D and Supervisor Statement of Work) required no later than 04 / 30 / ___ unless otherwise noted in local code. OR <input type="checkbox"/> D. Visual Inspection and Dust Inspection with Lead Free Exterior	<input type="checkbox"/> 5. Lead Safe Methods <input type="checkbox"/> A. Dust Inspection OR <input type="checkbox"/> B. Dust Inspection and Visual Inspection OR <input type="checkbox"/> C. Dust Inspection with Lead Free Exterior OR <input type="checkbox"/> D. Dust Inspection and Visual Inspection with Lead Free Exterior AND Verification that windows are lead free or have been treated so friction surfaces are lead free.
---	---	---	---

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 **01 01 16** at **01 15** a.m./p.m. under Title 6, Subtitle 8 of the Environment Article, Annotated Code of MD.

Jane Doe **Jane Doe** **9999** **1/1/25** **Does Lead Inspections** **9998** **1/1/25**

Inspector's Name Inspector's Signature Accreditation No. Accreditation Exp. Date Inspection Contractor Name Accreditation No. Accreditation Exp. Date

Common Errors

Sample



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.**



Form A - Disclaimer

Every
Certificate
gets the
Disclaimer!!!

MARYLAND DEPARTMENT OF THE ENVIRONMENT

Land and Materials Administration • Lead Poisoning Prevention Program
1800 Washington Boulevard • Suite 630 • Baltimore Maryland 21230-1719
410-537-3825 • 800-633-6101 x3825 • www.mde.state.md.us/lead

FORM A- INSPECTION CERTIFICATE DISCLAIMERS

This disclaimer is to be distributed to the property owner by the inspection contractor upon issuance of any Lead Paint Certificate. DO NOT SEND THIS FORM TO MDE.]

“RISK REDUCTION DISCLAIMER”

Meeting the Full or Modified Risk Reduction Standard pursuant to §6-815 or §6-819 of Annotate Code, Environment Article does NOT mean that the affected property is lead-free or lead-safe. This inspection standard is to be repeated dependant on certain triggering events.

“EXPIRATION DISCLAIMER”

Any inspection certificate issued as limited or provisional shall expire automatically upon the occurrence of any event which, under Maryland law, requires the re-inspection or re-certification of the subject property unless such re-inspection or re-certification occurs prior to that expiration date.

The “EXPIRATION DISCLAIMER” applies to:

- 1) Any LEAD FREE CERTIFICATE ISSUED UNDER OPTION B (“LIMITED LEAD FREE”).

This means that the exterior was not tested for lead or did not pass the allowable limit for lead based paint in Maryland, but met the Lead Free standard on the interior allowed under the Annotated Code of Maryland, Environmental Article, §6-804 on the interior.

- 2) Any **Full or Modified Risk Reduction Certificate** issued using Method C or D **where the exterior is NOT Lead Free**.

This means that the exterior currently does not meet either risk reduction standard because it has chipping, peeling or flaking paint. A certificate may be issued under the provision for an exterior waiver is allowed under the Annotated Code of Maryland, Environmental Article, §6-815 (d) or §6-819(j). A re-inspection to clear that waiver must be performed on or before April 30th of that expiration year. If the re-inspection does not show satisfactory completion of the work required in order for the exterior to meet Department standards, the certificate will be considered to have expired as of the provisional date stated on the original certificate.

For more information, please visit the Lead Poisoning Prevention Program’s website at www.mde.state.md.us/lead and navigate to the Rental Owners page or call the Program at 410-537-3825.



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.



SUPERVISOR'S STATEMENT OF WORK (SSW)

555XXX

Inspection Certificate No. (to be completed by inspector)

Code of Maryland Regulations (COMAR) 26.16.02.03 states certification of a Visual Inspection shall not be issued without this statement signed by an accredited supervisor stating that all the lead hazard reduction treatments were performed, or still in effect, in accordance with the statute and applicable regulations. The lead supervisor/contractor is to create **two originally signed** Supervisor's Statement of Work forms. Those forms are to be given to the property owner to forward to the lead inspector. The inspector is to keep one and attach one of the statements to Form B or Form D for submittal to Maryland Department of the Environment.

Beginning on 12/01/2025 and ending 12/04/2025, the following lead hazard reduction treatments were performed or still in effect at 112 Main St. A Baltimore, 21202 Balt. City
Date: MM/DD/20YY Date: MM/DD/20YY
Street Address Unit City Zip Code County

in accordance with the law (Environmental Article 6-819) and the regulatory requirements of COMAR 26.16.05.08 and 26.16.01.11:

The supervisor should check all boxes in the columns below that apply as it relates to each treatment.		
Treatment Type	Supervised the performance of this treatment.	Verified that the treatment is still in effect.
Removed and repainted any chipping, peeling or flaking paint on interior and exterior surfaces.	✓	
Repaired any structural defects that could cause paint to chip, peel or flake.		✓
Repainted, replaced or encapsulated all interior window sills where lead based paint or untested paint exists per COMAR 26.16.05.08	✓	
All untested window wells where lead based paint or untested paint exists are capped, with vinyl, aluminum, or other MDE approved material, in order to make them smooth and cleanable.	N/A	
Fixed the top sash of untreated or non-replacement windows to eliminate friction. (Subject to Federal, State and Local Codes.)	✓	
Re-hung all doors to prevent the rubbing together of a lead-painted surface with another surface.	✓	
All kitchen and bathroom floors are overlaid with smooth, water resistant covering.		✓
The unit is free of visible dust, debris or residue; and HEPA-vacuuming and detergent washing have been done in rooms where repairs were made.	✓	

Bob's Abatement, LLC

Accredited Residential, Commercial, and Public Building Contractor's Name (print)

Robert Bob

Accredited Supervisor's Name (print)

Robert Bob

Accredited Supervisor's Signature and Date (original signature on all copies)

68686 01/18/18

Accreditation No. and Accreditation Expiration Date

59555 09/01/18

Accreditation No. and Accreditation Expiration Date

11/01/17



Form B – Visual Inspection

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 x3825 • www.mde.state.md.us

FORM B – VISUAL INSPECTION (For Modified Risk Reduction)

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 26.16.02.03). 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).

MDE Tracking No.: 000158	Date of Inspection: MM/DD/20YY 11 / 09 / 2011	Inspection Certificate No.: 100001
Address of Property Inspected:		
Street Address: 101 Somewhere Street	Unit No.: 101	City: Baltimore
		Zip Code: 21230

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	Accreditation Expiration Date: 11 / 11 / 2012
Supervisor's Name: Stanley Supersander	
Date of Supervisor's Statement of Work: (mm/dd/20yy) 11 / 01 / 2011	

PART II

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

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

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 x3825 • www.mde.state.md.us

FORM B, PART III- Modified Risk Reduction Treatments

Confirm the following treatments have been completed satisfactorily, pursuant to COMAR 26.16.05 and Environmental Article 6-8.

	Satisfactory? (circle one in each row)
All interior and exterior surfaces are free of chipping, peeling or flaking paint.	Yes / No
The Dwelling unit is free of structural defects that could cause paint to chip, peel or flake.	Yes / No
All interior window sills where lead based paint or untested paint exists have been repainted, replaced or encapsulated. (Attach XRF results for tested sills.)	Yes / No
All untested window wells where lead based paint or untested paint exists are capped, with vinyl, aluminum, or other MDE approved material, in order to make them smooth and cleanable.	Yes / No
Top sash of untreated or non-replacement windows have been fixed to eliminate friction. (Subject to Federal, State and Local Codes.)	Yes / No
Doors have been re-hung to prevent the rubbing together of a lead-painted surface with another surface.	Yes / No
All kitchen and bathroom floors are overlaid with smooth, water resistant covering.	Yes / No
The unit is free of visible dust, debris or residue. HEPA-vacuuming and detergent washing have been done in rooms where repairs were made.	Yes / No

Comments:

Local fire codes prohibit fixing top sash in place.

Accredited Inspection Contractor's Name: (print) Plumbee's	Accreditation No.: 53585	Accreditation Expiration Date: 04/11/2012
Accredited Inspector's Name: (print) Bob Plumbee	Accreditation No.: 53586	Accreditation Expiration Date: 04/11/2012
Accredited inspector's Signature: Bob Plumbee	Date: (MM / DD / 20YY) 11 / 09 / 2011	



Form C – Visual Review / Dust Sample Collection & Analysis

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 330), 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 10 CALENDAR DAYS following the inspection. This form must be fully completed and accurate or the Inspection Certificate may be invalidated. (EA 6-8, COMAR 26.16.02 and 26.16.05)

MDE Tracking No.: 0551151	Date of Inspection: 01 / 01 / 2018	Inspection Certificate No.: 999888		
Address of Property Inspected:				
Street Address: 112 Main Street	Unit No.: A	City: Hampstead	Zip Code:	County/City: Carroll
Date of Lab Report: 01 / 03 / 2018	Date Lab Report was Received by Inspector: 01 / 04 / 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? <i>(circle one in each column)</i>	INTERIOR		EXTERIOR	
	Yes <input checked="" type="radio"/> No <input type="radio"/>	Yes <input type="radio"/> No <input checked="" type="radio"/>		
Is an Exterior Waiver being used? <i>(circle one)</i>	Yes <input checked="" type="radio"/> / No <input type="radio"/>			
If Yes, this Certificate expires on: 04/30/2018. The property must pass re-inspection no later than this date or this inspection certificate will no longer be valid. Name of the approving agency or official for the Exterior Waiver: Carroll County. Form D with the Supervisor's Statement of Work form 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. Show each room within the unit and number each. Your numbering system on your diagram is to 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 copies of page 2 of this form if there are more rooms than can be accommodated 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: floors <40; window sills <250; window wells <400 µg/ft². A copy of the Laboratory Analysis Report must be attached to this form. The Result column, below, is for results/concentration of lead in micrograms per square foot (µg/ft²), not Total Lead (µg).

FORM C, PART III Continued

Page No.: 2

Is this a retest of failed room(s)? <i>(circle one)</i>	Yes <input type="radio"/> No <input checked="" type="radio"/>
---	---

* Field Blank	SAMPLE No.	AREA (in inches)	RESULT µg/ft²
	000T12	12 x 12	<10

*Field blank samples are required to be collected per the American Society for Testing and Materials (ASTM) International Standard E 1728 as of May 19, 2008. Field blanks only have to be collected at a minimum frequency of 5% (or 1 for every 20 field wipe samples collected). Therefore, completion or not of the Field Blank box may vary.

ROOM NO.:	Number of NON-Lead Free windows in room:	Number of Lead Free windows in room:	Total number of windows in room:	
1	1	2	3	
SURFACE	SAMPLE No.	AREA (in inches)	RESULT µg/ft²	MEETS STANDARD
Floor	000T01	12 X 12	13	Yes / No
Sill				Yes / No
Well	000T02	2.5 X 30	400	Yes <input checked="" type="radio"/> No <input type="radio"/>
Total Samples Collected in room:				

ROOM NO.:	Number of NON-Lead Free windows in room:	Number of Lead Free windows in room:	Total number of windows in room:	
2	0	1	1	
SURFACE	SAMPLE No.	AREA (in inches)	RESULT µg/ft²	MEETS STANDARD
Floor				Yes / No
Sill	000T03	2-1/3 X 32-1/2	49	Yes / No
Well				Yes / No
Total Samples Collected in room:				

ROOM NO.:	Number of NON-Lead Free windows in room:	Number of Lead Free windows in room:	Total number of windows in room:	
SURFACE	SAMPLE No.	AREA (in inches)	RESULT µg/ft²	MEETS STANDARD
Floor				Yes / No
Sill				Yes / No
Well				Yes / No
Total Samples Collected in room:				

ROOM NO.:	Number of NON-Lead Free windows in room:	Number of Lead Free windows in room:	Total number of windows in room:	
SURFACE	SAMPLE No.	AREA (in inches)	RESULT µg/ft²	MEETS STANDARD
Floor				Yes / No
Sill				Yes / No
Well				Yes / No
Total Samples Collected in room:				

Accredited Inspector's Name: James Doe	Inspector's Accreditation No.: 55555	Date of Inspection: 01/01/2018
---	---	-----------------------------------



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 D – RE-INSPECTION				
THIS FORM AMENDS THE REFERENCED INSPECTION CERTIFICATE (Form 330)				
This form is only to be complete if this Re-Inspection has passed. Do NOT Submit a new Inspection Certificate.				
<u>055990</u>	<u>04 / 15 / 2018</u>	<u>999888</u>		
MDE Tracking No.	Date of Inspection (mm/dd/yyyy) <i>(as noted on Inspection Certificate)</i>	Inspection Certificate No.		
<u>112 Main Street</u>	<u>A</u>	<u>College Park</u>	<u>PG</u>	<u>20740</u>
Street Address of Site	Unit	City	County	Zip Code
Check ONE of the boxes below:				
<input type="checkbox"/> EXTERIOR WAIVER - This re-inspection was performed to clear the waiver for exterior components noted in the original inspection to meet lead hazard reduction requirements.				
In accordance with COMAR 26.16.02.03, the supervisor responsible for lead hazard reduction treatments must provide the Supervisor's Statement of Work form that states that the required treatments were performed in accordance with the law and applicable regulations. Attach the signed Supervisor's Statement of Work regarding treatments that were performed to correct exterior defects.				
Supervisor's Accreditation No. <u>55998</u> Date of Statement <u>05 / 01 / 2018</u>				
<input type="checkbox"/> LIMITED LEAD FREE CERTIFICATION - This re-inspection was performed following a required inspection for Limited Lead Free certification, as indicated on the original certificate. This re-inspection confirms that there currently is no chipping, peeling or flaking exterior paint. Attach the signed Supervisor's Statement of Work if defective paint was corrected.				
Recertification is required by the following date ____/____/____				
Supervisor's Accreditation No. _____ Date of Statement ____/____/____				
<input type="checkbox"/> TEST FOR LEAD DUST - This re-inspection was performed to retest rooms which failed to meet the lead dust standards under COMAR 26.16.02.03B or COMAR 26.16.02.04B. Attach Form C and laboratory results.				
I certify that on <u>04 / 15 / 2018</u> at <u>1 : 15</u> a.m./p.m., I re-inspected the property/unit listed on the inspection certificate referenced above. I further certify that the property/unit has satisfactorily passed my examination under the relevant provisions of Environment Article, Title 6, Subtitle 8, Annotated Code of Maryland.				
<u>Does Inspections, LLC</u>		<u>55999</u>	<u>07/11/2019</u>	
Accredited Inspection Contractor's Name <i>(print)</i>		Accreditation No. and Accreditation Expiration Date		
<u>Jane Doe</u>		<u>55998</u>	<u>09/10/2020</u>	
Accredited Inspector's Name <i>(print)</i>		Accreditation No. and Accreditation Expiration Date		
<u>JaneDoe</u>		<u>04/15/18</u>		
Accredited Inspector's Signature and Date (mm/dd/yyyy)				



Form E - Lead Free

Form E
has 3
Parts!!!

1. The
Summary
Report

FORM E- LEAD-FREE INSPECTION SUMMARY REPORT			
MDE TRACKING #:	CERTIFICATE #:	INSPECTOR ACCRED #:	INSPECTOR NAME (PRINTED):
0555999	999888	55999	Robert Bob
MDE PROPERTY #:	SITE ADDRESS (INCLUDE: STREET NUMBER, NAME, TOWN, AND ZIP CODE):	INSP. CONTRACTOR ACCRED #:	INSP. CONTRACTOR NAME (PRINTED):
03-121214	112 Main St. Hampstead 21522	55988	Bob's Inspections
<p><small>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.</small></p>			
SECTION 1, Interior Surfaces:			
<p>If <u>multiunit building or multibuilding complex</u> is being certified as Lead-Free under this certificate # then, the "Form E- Appendix" must be submitted.</p>			
<p>Total# of Units this Certificate Applies to: <u>50</u> Total# Units Surveyed: <u>200</u> Total Parcels: <u>1 of 3</u></p>			
<p>Total# of XRF Readings: <u>4,908</u> Total# of Inconclusive XRF Readings: <u>25</u> Total# of Paint Chip Samples Collected <u>10</u></p>			
SECTION 2, Exterior Surfaces (Includes Common Areas): <u>CHECK ONE BOX ONLY:</u>			
<input type="checkbox"/> OPTION A (one time only): Exterior is Lead-Free, satisfactory result requires no further action.		<input type="checkbox"/> OPTION B (limited): Exterior is <u>not</u> Lead-Free but free of any chipping, peeling or flaking paint. Must be reinspected within two years on or before <u>05 / 01 / 2020</u> or the certificate is expired.	
<p>Total# of XRF Readings: <u>425</u> Total# of Inconclusive XRF Readings: <u>12</u> Total# Paint Chip Samples Collected: <u>5</u></p>			
SECTION 3, Factory Applied Coatings on Metal Components: <u>CIRCLE ONE:</u> YES NO			
<u>Robert Bob</u> Inspector's Signature		<u>05 / 01 / 2018</u> Date Certified Lead-Free: Month(00)/ Date(00) / Year(0000)	



Form E

2. The Appendix (unit list)

FORM E- APPENDIX Page ____ of ____
INVENTORY OF LEAD-FREE UNITS

If a **multiunit building or multibuilding complex** is being certified as Lead-Free under this certificate # then "Form E- Appendix" must be submitted with "Form E- Lead-Free Inspection Summary Report" AND "Form E- Fee".
List **ALL UNITS** that are being certified as Lead-Free (attach additional sheets if necessary).

MDE Tracking #: _____ Certificate #: _____ Parcel ____ of _____

Date Certified Lead-Free: _____ Number of Units Certified Lead-Free: _____

Property Name: _____

Street Number	Street Name	Unit Number	City, State, Zip Code

3. The Fee Payment

FORM E- FEE
LEAD-FREE INSPECTION FEE PAYMENT FORM

For Bank Use Only:
COMPT.OBJ., \$714672

(One Pgs. Certificate)

MDE TRACKING #:	CERTIFICATE #:	INSP. ACCRED. #:
PROPERTY #:	DATE CERTIFIED LEAD-FREE:	INSP. CONTRACTOR #:

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 inspector must complete the owner information below if there is no tracking number or if it is not known by the owner. Do not delay submission. The owner is responsible for paying a \$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 this Fee Payment Form. **NOTE:** In accordance with the **Annotated Code of Maryland, Environment Article §6 – 843 (a)(3)(iii)** the owner is responsible for sending a \$10.00 per unit processing fee for submission of a Lead-Free inspection report. **Section 6 – 843 (d)** provides that the penalty for failure to pay any fee imposed by the law is a civil penalty of up to triple the amount of the unpaid fee together with all costs of collections, including attorney's fees. **IF A MULTIUNIT BUILDING OR MULTIBUILDING COMPLEX IS BEING CERTIFIED AS LEAD-FREE UNDER THIS CERTIFICATE # THEN, A COPY OF "FORM E- APPENDIX" MUST BE SUBMITTED WITH THIS "FORM E- FEE".** This will indicate what units are being paid for.

FEE PAYMENT (Inspector must complete this section)	
Please list MDE Tracking # on the check, canceled check will serve as the receipt.	TOTAL # of units certified Lead-Free _____ (Processing Fee per unit) X \$10.00 TOTAL PAYMENT DUE to be Submitted _____

Return the completed form and payment to:	MARYLAND DEPARTMENT OF THE ENVIRONMENT P.O. BOX 1417 BALTIMORE, MD 21203
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The following information is required **ONLY** if there is no MDE Tracking # above. Get MDE Tracking # by calling 1-800-776-2706 or 410-537-4192. The inspector must complete this section. If any question does not apply, mark N/A.

Owner Name	Last, First, MI
Owner Address	
City, State, Zip	
Owner Telephone #	
Property Address	
City, State, Zip Code	
Please List County	
Property Mgr. Name	
Property Mgr. Address	
Mgr. Telephone#	



Pitfall # 6

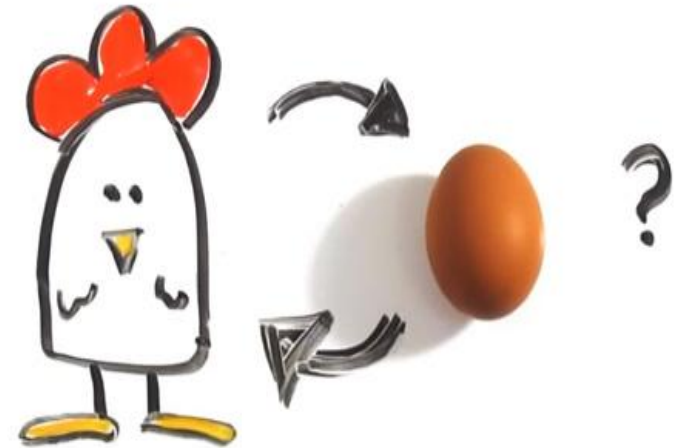
Risk Reduction Gone Wild

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



Full vs. Modified Risk Reduction

Full Risk Reduction

- Required for:
 - Tenant Turnover
 - New Rental

- FRR is the lower standard.

Modified Risk Reduction

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

- MRR is the higher standard.



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.



Lead Free

- 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





Maryland
Department of
the Environment

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))





Common Pitfalls – Removal from Risk

- 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





Common Pitfalls – Containment





Common Pitfalls – Containment





Common Pitfalls – Containment





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))



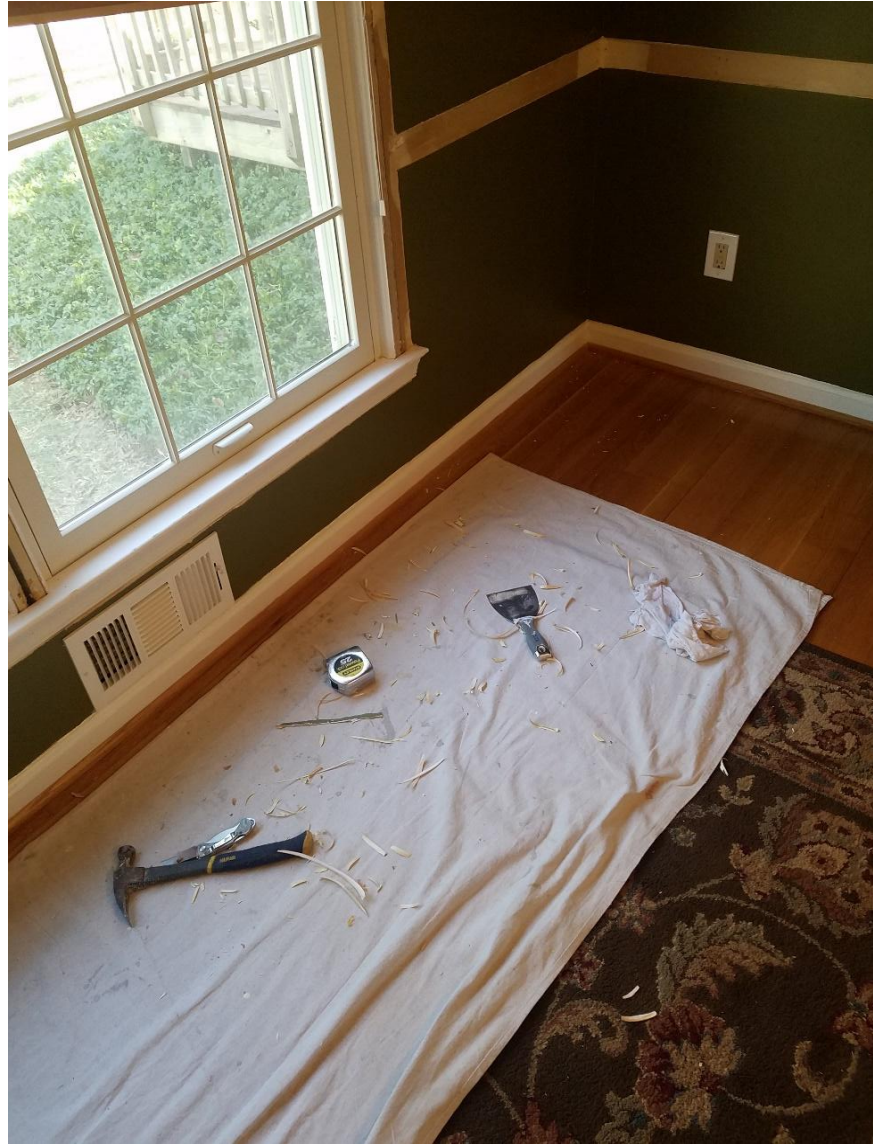


Common Pitfalls – Improper Abatement Method

- 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





Common Pitfalls – Improper Waste Disposal

- 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





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)





Common Pitfalls – Improper Waste Disposal

- Liquid waste containing lead-based paint or presumed lead-based paint must be specially handled. Refer to COMAR 26.13.03 for guidance.





Common Pitfalls – PPE / Worker Safety

- 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





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)

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, • Suite 630 • Baltimore, Maryland 21230-1719
410-537-3825 • 800-633-6101 x3825 • <http://www.mde.state.md.us>

Waste Management Administration • Lead Poisoning Prevention Program

LEAD ABATEMENT PROJECT NOTIFICATION

The Lead Abatement Supervisor/Contractor is to complete this form and mail or fax to the Lead Poisoning Prevention Program of Maryland Department of the Environment, MDE, prior to performing a Lead Abatement Project.

COMAR 26.16.01.11

A. Except for performance of lead hazard reduction treatments described in Environment Article, §§6-815 and 6-819, Annotated Code of Maryland, persons performing lead paint abatement services shall ensure that the provision of lead paint abatement services involving residential buildings and child care centers conforms to COMAR 26.02.07.

A-1. At least 24 hours but not more than 10 days before beginning lead paint abatement projects for residential buildings, the contractor or supervisor shall notify the Department of the location and anticipated start and completion dates for the projects.

Mail To: Maryland Department of the Environment OR Fax To: 410-537-3156
Lead Poisoning Prevention Program
1800 Washington Boulevard, Suite 630
Baltimore, Maryland 21230-1417

Original Notification Date: _____
Revised Notification Date: _____
From: _____
MDE CASE NUMBER (If applicable): _____
Contractor Accreditation Number (If applicable): _____
Project Supervisor: _____
Supervisor's Accreditation Number: _____
Project Start Date: _____
Project Completion Date: _____
Project Address: _____
Scope of Work: _____
Owner's Name: _____
Owner's Phone Number: _____

Form Number: MDE/WAS/COM.058
Revised: 05/28/2008
TTY Users: 800-735-2258

Page 1 of 1
Recycled Paper



The End

Questions?



**Thank you for attending the
2019 Inspection and
Contractor Forum!!**