

CONNOR

COMPLIANCE CORNER

August 2018



“HOW TO GUIDE” TO COMPLIANCE - PART 1



Work Area Setup Interior

To setup:

- Have persons not performing work out of the work area (i.e., the room)
- Post in visible location at each entrance “Caution Lead Hazard Keep Out” in bold lettering at least 2 inches high



- Move all movable objects out side of the room or to distance of at least 3 feet from the surface on which the work is to be performed, and cover with plastic sheeting at least 4 mils thick
- Place 4 mil plastic sheeting on the floor (approximately 4' out and 4' to either side of the work area)
- Create a containment to keep dust and debris within the work area (i.e., cover windows, doors)
- Turn off all forced air ventilation in the work area and cover exhaust and intake points with 4 mil plastic
- Seal storage areas of food, dishes and utensils

Exterior

To setup:

- Place plastic sheeting at least 6 mils thick on extending out 3 feet per story being worked on with a minimum of 5 feet and a maximum of 20 feet. Plastic may not extend beyond the nearest sidewalk.
- Close, cover, and seal any window or door within 20'
- Weigh the sheeting down along edges and seams
- If the constant wind speed is over 15 mph, erect vertical shrouds

Coming next: “How to Guide” to Compliance - Part 2

Work Methods

Methods when disturbing a lead-based paint surface:

- Wet scraping (for example, to remove loose, chipping or peeling paint)
- Wet sanding (for example, when smoothing a surface for repainting)
- Wet misting before removal and replacement of a component
- Using a power sander or other power tools equipped with HEPA vacuum exhaust systems



Other methods that can be used to treat a lead-based paint surface are:

- Paint removal by heat gun
- Paint removal by non-flammable chemical stripper which does not contain methylene chloride
- Paint removal by off-site chemical stripping
- Enclosure with a rigid covering such as aluminum, vinyl, dry wall, plywood, etc.

Methods you CANNOT use:

- Open flame burning
- Dry scraping
- Dry sanding, unless power sander is equipped with HEPA exhaust system
- Open abrasive blasting
- Uncontained hydro-blasting
- Paint stripper with methylene chloride

Work Area Cleanup

Mist and carefully roll up plastic sheeting.

- Large debris generated should be wrapped in plastic sheeting for disposal
- HEPA vacuum and wash the work area before repainting
- HEPA vacuum all surfaces (including areas that were covered with plastic) except ceilings
- Wash all surfaces (including areas that were covered with plastic) except ceilings, walls and carpeted surfaces, with a high quality detergent, changing the wash water at frequent intervals. Use of a double-sided bucket and disposable rags is recommended.

Dust

- Floors, window sills, and window wells 24 hrs before clearance inspection
- HEPA vacuum all of the areas throughout
- Wash all surfaces in the areas throughout with a high quality detergent and changing the wash water at frequent enough intervals to assure adequate cleaning (every room)
- Dispose in toilet - NOT sinks
- Use of a double-sided bucket and disposable rags is recommended
- HEPA vacuum all of the areas throughout - repeat



Soil

Dripline

- Cover area with landscaping barrier
- Apply several inches of mulch

Midyard or areas of no mulch

- Apply sod

How to complete 1018 disclosure review for LBP

Lease info

- ☐ Unit Identifier
- ☐ Resident 1
- ☐ Resident 2
- ☐ Resident 3
- ☐ Resident 4
- ☐ Is this a renewal?
- ☐ Audit Date mm/dd/yyyy
- ☐ Lease Date mm/dd/yyyy
- ☐ Disclosure Date mm/dd/yyyy

Header info

- ☐ Is there a 1018 form present?
- ☐ Is the lease present?
- ☐ Does the disclosure form correctly identify the community name?
- ☐ Does the disclosure form correctly identify the community address?
- ☐ Does the disclosure form correctly identify the stage of construction?

40 CFR 745.113(b)(1)

- ☐ Is the Lead Warning Statement pursuant to 40 CFR Part 745.113(b)(1)?

40 CFR 745.113 (b)(2) Lessors Disclosure Section

- ☐ Is the Lessor (and/or Owner) identified?
- ☐ Is the printed Lessor name accurate?
- ☐ Has the lessor disclosed the presence of LBP or indicated no knowledge of LBP?
- ☐ Has the lessor disclosed the presence of LBP Hazards or indicated no knowledge of LBP Hazards?
- ☐ Has the lessor disclosed all information concerning LBP and/or LBP Hazards (i.e. a list of any record or report available)?

- ☐ Does the community have the reports and/or records listed in the disclosure section?
- ☐ Are ALL reports and/or records available to the Lessor listed in this disclosure section?

40 CFR 745.113(b)(4)

Lessee's Acknowledgment

- ☐ Is the Lessee the same person as persons identified on the lease?
- ☐ Did all lessee's initial to acknowledge receipt of the form?
- ☐ Did all lessees initial to acknowledge they were informed that the records and reports are available for review in the rental office?
- ☐ Did all lessees initial to acknowledge they were informed that the records and reports will be provided at no cost upon written request?
- ☐ Did the lessees initial to acknowledge they were provided the opportunity to review records and reports at this time?
- ☐ Did the lessees initial to acknowledge receipt of the MDE pamphlet "Notice of Tenant's Rights" 6-820? Maryland Requirement
- ☐ Did the lessees initial to acknowledge receipt of the Environmental Protection Agency Lead Hazard Information Pamphlet "Protect Your Family from Lead in Your Home"?

- ☐ Did the lessees initial to acknowledge they were informed that they can in the future review a copy of the records and reports?
- ☐ Did the lessees initial to acknowledge receipt of a MD inspection certificate, risk reduction 6-815 and the supporting documentation? Maryland requirement

40 CFR 745.113(b)(6)

Certification of Accuracy

- ☐ Is the Lessor name accurate?
- ☐ Is the Lessor (and/or Owner) identified?
- ☐ Does the Lessor have a signature?
- ☐ Is the Lessor line dated?
- ☐ Is/are the Lessee signature(s) on the form?
- ☐ Is/are the Lessee(s) signature(s) dated?
- ☐ Is the Agent identified?
- ☐ Does the Agent have a signature?
- ☐ Is the unit address listed on the provided line (not regulated)?
- ☐ Is the printed Agent name accurate?
- ☐ Is the Agent line dated?

40 CFR 745.113(b)(5)

- ☐ Is the printed Agent name accurate?
- ☐ Is the Agent identified?
- ☐ Is the required Agent's acknowledgment initialed?

***** Please review the entire law or contact your Environmental Professional to ensure compliance *****

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CONNOR INSTITUTE CALENDAR

BALTIMORE, MD

Course	August	September	October	November
Are You In Compliance? [\$90.00]		13 (morning)	11 (morning)	15 (morning)
Lead Risk Assessor - Refresher [\$180.00]	27	11	29	21
Renovator Refresher (Half Day) [\$90.00]	27 (morning)	25(morning)	26 (morning)	23(morning)
Supervisor - Maintenance and Repainting Refresher (Maryland) [\$180.00]	28	27	30	27

OWINGS MILLS, MD

Course	August	September	October	November
Asbestos Awareness [\$90.00]	21 (afternoon)	17 (afternoon)	23 (afternoon)	20 (afternoon)
Mold Awareness [\$90.00]	21 (morning)	17 (morning)	23 (morning)	20 (morning)
Mold Prevention and Remediation [\$180.00]	23	24	25	30
Renovator Initial (Full Day) [\$180.00]	30	6, 28	4, 31	8, 29
Supervisor - Maintenance and Repainting - Initial (Maryland) [\$360.00]	15-16	20-21	18-19	13-14

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INSTITUTE

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