



Maryland
Department of
the Environment

Innovative Enforcement Partnerships at the Maryland Department of the Environment

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Collaboration with Johns Hopkins University (JHU)

MDE senior management and Dr. Paul Ferarro met at a conference and discussed the possibility of collaborating on research in approaches to environmental compliance and enforcement activities.

MDE's main office is located in Baltimore as is JHU. This makes it easy to have face to face meetings and for the researchers to spend time at the Department.

MDE and JHU entered in to a Memorandum of Understanding addressing the collaboration.



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Project Selection Goals for MDE

- Minimal extra work for staff
- No effect on MDE's ability to meet any grant commitments
- Possible continued applicability after the study is over



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Initial Project Selection

The initial proposed project was to focus on the effect of announced vs. unannounced inspections on long term compliance. MDE and JHU worked together for about three months on the scope for this project.

- Types of inspections that would be eligible
- Number of inspections
- Compliance rates

Unfortunately, after the initial analysis, JHU determined the population was not large enough for the study to be able to produce statistically meaningful results.



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Selection of the Current Project

Based on what they learned about MDE during the research for the initial project, JHU came back with new projects they thought would be good.

From the list of proposed projects MDE's Lead Poisoning Prevention Program was interested in the project related to the third-party inspectors.



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The Basics of Maryland's Lead Poisoning Prevention Program

MDE regulates rental housing built prior to 1978 through a registration and certification program.

In addition, MDE has an accreditation program for third-party lead paint inspectors and contractors.

This has been very effective at reducing the extent and severity of lead exposure among children. The 2017 report shows less than 0.3 percent of children tested across the state showed blood lead levels at or above the state law-defined elevated level of 10 micrograms per deciliter. This is the lowest since data collection started in 1993. There was also a decrease in the number of children with blood lead levels in the 5 to 9 micrograms per deciliter range.



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How the Process Works – Simplified Version

Owners of pre-1978 rental properties –

- Required to meet the Full Risk Reduction Standard at every change in occupancy
- This means no chipping, peeling, or flaking paint, and passing the test for lead-contaminated dust; and
- Submitting a report from an independent accredited inspector with the passing inspection certificate

Accredited inspectors –

- Notify MDE at least 24 hours in advance of any lead paint inspection
- Advise if the inspection is rescheduled
- Submit inspection certificates to MDE



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MDE Oversight Inspections

MDE performs oversight inspections of the accredited inspectors. These oversight inspections ensure inspections are performed according to regulatory standards.

Oversight inspections may be announced or unannounced.

Being able to perform oversight inspections is part of why receiving advance notice from the third-party inspectors is important.



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Size of the Universe

Number of registered rental units – 133,809 at the end of FY 2018

Number of accredited Lead Inspection Contractors – 453

Number of inspections performed by accredited inspectors – 53,330 in FY 2018



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Additional Information Resources

MDE Web Site –

<https://mde.maryland.gov/Pages/index.aspx>

Lead Poisoning Prevention Program –

<https://mde.maryland.gov/programs/LAND/LeadPoisoningPrevention/Pages/index.aspx>

Annual Childhood Lead Registry Reports –

<https://mde.maryland.gov/programs/LAND/LeadPoisoningPrevention/Pages/healthcare.aspx>



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Additional Innovative Collaborative Project

MDE is also participating in the NPDES effluent exceedances notification pilot study with EPA and the University of Chicago. This study uses the data submitted to NetDMR/ICIS to send notification emails to facilities with reported effluent exceedances. This project has required minimal input from MDE because it is run directly off EPA's data systems.