

COMPLIANCE ASSISTANCE VISIT (CAV)

WHAT IS A COMPLIANCE ASSISTANCE VISIT?

- An independent, non-punitive review of:

Environmental Protection Agency (EPA) – Code of Federal Regulation – Title 40

- Subpart E – Residential Property Renovation
 - 40 CFR Part 745.84 – Information Distribution Requirements
 - 40 CFR Part 745.86 – Recordkeeping and Reporting Requirements
- Subpart F – Disclosure of Known Lead-based Paint and/or Lead-based Paint Hazards Upon Sale or Lease of Residential Property
 - 40 CFR Part 745.113 – Certification and acknowledgement of disclosure
 - 40 CFR Part 745.115 – Agent Responsibilities

Occupational Health and Safety Administration (OSHA) – Code of Federal Regulations - Title 29 *

- Subpart D – Occupational Health and Environmental Code
 - 29 CFR Part 1962.62 (d)(3) – Basis of Initial Determination
- *Included as an element of Subpart E - 40 CFR Part 745.86 review

Department of Housing and Urban Development (HUD) – Code of Federal Regulations – Title 24

- Subpart B – General Lead-Based Paint Requirements and Definitions for All Programs
 - 24 CFR Part 35.125 – Notice of Evaluation and Hazard Reduction Activities
- Subpart H – Project-based Assistance
 - 24 CFR Part 35.715 – Multifamily Properties Receiving More Than \$ 5,000 per Unit
- Subpart R – Methods and Standards for Lead-Paint Hazard Evaluation and Hazard Reduction Activities
 - 24 CFR Part 35.1320 – Lead-based Paint Inspections, paint testing, risk assessments, lead-hazard screens and reevaluations



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- 24 CFR Part 35.1330 – Interim Controls
- 24 CFR Part 35.1335 – Standard Treatments
- 24 CFR Part 35.1340 – Clearance
- 24 CFR Part 35.1345 – Occupant Protection and Worksite Preparation
- 24 CFR Part 35.1350 – Safe Work Practices
- 24 CFR Part 35.1355 – Ongoing Lead-based Paint Maintenance and Reevaluation Activities

OPTIONAL STATE LEVEL REVIEW SUCH AS:

Code of Maryland Regulations – Title 26 – Department of the Environment

- Subtitle 16 – Lead
 - Chapter 01 – Accreditation and Training for Lead Paint Abatement Services
 - .07 – Lead Paint Abatement Worker Training Requirements for Residential, Commercial and Public Buildings.
 - .09 – Lead Paint Abatement Services Contractor Accreditation Requirements
 - .10 – Supervisor Accreditation Requirements for Residential, Commercial and Public Buildings
 - Chapter 02 – Reduction of Lead Risk in Housing
 - .03 – Certificate to Verify Satisfaction of Risk Reduction Standard
 - Chapter 04 – Verifiable Methods Approved by the Department

Annotated Code of Maryland – Title 6 – Environment

- Subtitle 8 – Reduction of Lead Risk in Housing
 - Section 804 – Exemptions from Part IV
 - Section 811 – Registration
 - Section 812 – Renewal, acquisitions



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- Section 820 – Notice of Tenant’s Rights
- Section 823 – Lead Poisoning Information Packet
- Section 843 – Collection and Payment of Annual fee, exemptions
- CAVs are utilized as a routine business practice by contractors, retailers, multi-family property owners, day-care operators and third party management companies.
- CAVs in conjunction with your legal counsel may be used in coordination with EPA’s Incentives for *Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations*. The purpose of this EPA Policy is to enhance protection of human health and the environment by encouraging regulated entities to voluntarily discover, promptly disclose and expeditiously correct violations of Federal environmental requirements.

HOW ARE CAVS COMPLETED?

- CONNOR Institute will come to your place of business.
- We will process specified number of leases, work orders or contracts, depending on the type (Multifamily or Contractor) of CAV requested and scope desired.
- We will review your documents and rate them for adherence to the stated regulatory requirements.
- We will scan and store all documents reviewed, developing an accurate record of what was reviewed.

WHO PERFORMS THE CAV?

- On-site reviews are completed by an experienced Principal Instructor, Risk Assessor and/or Certified Renovator.
- Our Auditors are professional and have practical field experience in applying the relevant regulations. They not only know the rules, they have studied the rule, becoming experts at the intricacies within the rule.



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HOW LONG DOES IT TAKE TO PERFORM A CAV?

- Each CAV takes a minimum of two on-site days. Single item CFR reviews may be done complete in one day.
- Summaries are issued within two weeks of the completion of the on-site phase.

WHAT DO I RECEIVE IN WAY OF A REPORT OR DELIVERABLE?

- Each Client receives a computer generated summary that lists:
 - The documents reviewed;
 - The regulations applied;
 - The outcome (Pass – Fail) per requirement, per regulations; and
 - The overall score as compared to CONNOR Institute Benchmark Standards.
- The summary provides:
 - Framework for Corrective Action;
 - Specific recommendations based on the recorded error rate; and
 - A plan that can be implemented by your Team or with the assistance of a CONNOR Institute Team member.

WHAT IS THE COST OF A CAV?

- Typically, a two day visit is \$1,500 per property per Subpart plus travel expenses.

HOW CAN I LEARN MORE ABOUT THE PROCESS AND THE NECESSARY INVESTMENT TO HAVE CAVS PERFORMED AT MY BUSINESS?

- Contact J. Robert “Bob” Bixler II – National CAV & Training Sales
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