

**Report on Section 1018 – Disclosure Rule Inspection to Determine Compliance
with the Toxic Substances Control Act and 40 C.F.R. 745 Subpart F**

Property Management/Owner Company Information

Company Name: Browning – Gordon & Co., Inc.
Street Address: 3015 Poston Avenue, Suite 101
City, State, Zip: Nashville, Tennessee 37203
Phone Number: (615) 383-3999
Email Address: bbrowning@browning-gordon.com

Inspection Date: June 28, 2021

Performed by: Oyepero Olowu
U.S. Environmental Protection Agency Region 4
Chemical Safety and Land Enforcement Branch
TSCA Enforcement Section
61 Forsyth Street, SW
Atlanta, Georgia 30303
TSCA Inspection Report
Inspection No.: 062821-OFO-01

The purpose of this report is to summarize information observed by the inspector during the field inspection. The information obtained will be used to support the compliance review conducted by the EPA Region 4. Additional information may be requested to support the review. The inspected facility will be notified of the final compliance determination by the EPA in a follow-up letter.

I. Reason for Inspection:

- ☒ TSCA Neutral Scheme
- ☐ Tip/Complaint
- ☐ Other:

II. Property Management (PM) Company Information

- A. PM Company Name: Browning – Gordon & Co., Inc.
- B. PM Company Owner: Beverly Browning
- C. Month and Year PM Company began managing the property: Various for multiple properties
- D. Is a PM Agreement in place: Yes
 - Is a copy of the PM Agreement available: Yes
- E. Email Address: bbrowning@browning-gordon.com

III. Inspection Participants

- ☒ Representative(s) and name of Company they represent: Beverly Browning
- ☒ U.S. EPA Inspector: Oyepero Olowu
- ☐ Other:

IV. Objectives

To monitor compliance with the EPA Lead Residential Lead-Based Paint Disclosure Rule under the TSCA Section 1018 of Title X and the EPA Region 4 Standard Operating Procedure for Conducting Compliance Monitoring Inspections for Toxic Substances Control Act Lead Based Paint effective October 23, 2015.

V. Inspection Summary

- A. Opening Conference
 - ☒ Inspector presented EPA credentials to the company representative and explained the purpose and scope of the inspection.
 - The following person(s) were/was present during the opening conference:
 - Company Representative: Beverly Browning
 - Title: Owner / President
 - Email address: bbrowning@browning-gordon.com
 - The following documents were presented to the company representative:
 - ☒ Notice of Inspection
 - Was the document signed? Yes ☒ No ☐
 - ☒ TSCA Inspection Confidentiality Notice
 - Was the document signed? Yes ☒ No ☐
 - ☐ Inspector was denied entry/inspection
 - By Name and Title:
 - Reason:

B. Inspection Observations and Documents/Sample Collection

☒ Leases/Contracts Received:

#	Address of Property being Leased	Date of Contract	Year Built Source of Information	Initial Lease or Lease Renewal
1	1804 A 15 th Avenue South, Nashville TN 37212	09/21/2020	Tax Records	Initial
2	5510 Country Drive, Nashville TN 37211	08/13/2020	Tax Records	Initial
3	6468 Thunderbird Drive, Nashville TN 37209	11/18/2019	Tax Records	Initial
4	1400 Acklen Avenue, Nashville TN 37212	11/19/2020	Tax Records	Initial
5	201 Waufrd Drive, Nashville TN 37211	06/22/2021	Tax Records	Initial
6	714 Brownlee Drive, Nashville TN 37205	05/15/2020	Tax Records	Initial
7	424 American Road, Nashville TN	02/16/2021	Tax Records	Initial
8	589 Highcrest Drive, Nashville TN	04/28/2021	Tax Records	Initial
9	2117 A 12 th Avenue South, Nashville TN 37204	09/22/2020	Tax Records	Initial
10	3816 Crouch Drive, Nashville TN	01/15/2021	Tax Records	Initial
11	2530 Hibbits Road, Nashville TN	10/09/2020	Tax Records	Initial
12	4000 Hutson Avenue, Nashville TN	05/11/2020	Tax Records	Initial
13	1721 A 14 th Avenue South, Nashville TN 37212	03/06/2019	Tax Records	Initial
14	1403 Tremont Avenue, Nashville TN	02/26/2021	Tax Records	Initial
15	3525 West End Avenue, Nashville TN	04/30/2020	Tax Records	Initial
16	6807 Holt Road, Nashville TN 37211	08/05/2020	Tax Records	Initial
17	2916 Glenmeade Drive, Nashville TN	04/25/2020	Tax Records	Initial
18	1504 Riverside Drive, Nashville TN 37206	07/01/2020	Tax Records	Initial
19	3016 Lebanon Pike, Nashville TN 37214	06/15/2020	Tax Records	Initial
20	2510 Sharondale Drive, Nashville TN 37215	07/23/2020	Tax Records	Initial

☐ Other documents collected

Type

☐ No files available for review

Reason:

C. Additional Comments

N/A

D. Closing Conference

The following person(s) were/was present during the closing conference:

Company Representative:

Title:

- ☒ Receipt for Documents signed by company representative
- ☒ Provided company representative with copy of the Notice of Inspection
- ☒ Provided company representative with a copy of the TSCA Inspection Confidentiality Notice
- ☒ Provided company representative with the Small Business Resources Information Sheet

- E. Post-Inspection Activities
- ☐ Addressed the company's questions
 - ☐ Provided the company with a list of requests to be submitted

VI. Attachments (Check all that apply)

- ☒ TSCA Inspection Confidentiality Notice
- ☐ Declaration of Confidential Business Information
- ☐ Notice of Inspection and Consent for Access
- ☒ Lead Paint Notice of Inspection
- ☒ Receipt for Documents
- ☐ EPA Chain of Custody
- ☐ Statements
- ☐ Photographs and Photo Log
- ☐ Diagrams

Report Prepared by:

Oyepero Olowu, Inspector
TSCA Enforcement Section
U.S. EPA, Region 4

Report Approved by:

F. Bryce Covington
Chief
TSCA Enforcement Section
U.S. EPA, Region 4