

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	3/19/2024	
Media Program:	Toxic Substance Control Act	
Regulatory Program(s)	Renovation Repair and Paint (RRP) and 1018 notification	
Company Name:	Fowler Property Management	
Facility Name:		
Facility Physical Location:	1537 Singelton Blvd	
(city, state, zip code)	Dallas TX 75212	
Mailing address:		
(city, state, zip code)		
County/Parish:	Dallas	
Facility Phone Number	(972) 460-6654	
Facility Contact:	Meagen Johnson	DFWmanager@Fowlerpropertymgmt.com
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	N/A	
NAICS:	531311	
SIC:	6531	
Personnel participating in inspection:		
Angela Hays	EPA Region 6	Inspector
Stan Lancaster	EPA Region 6	Inspector
Meagen Johnson	Fowler Property Management	Manager
EPA Lead Inspector Signature/Date	ANGELA HAYS Digitally signed by ANGELA HAYS Date: 2024.05.09 09:01:50 -05'00'	
	Angela Hays / Date	
Supervisor Signature/Date	H STUCKEY Digitally signed by H STUCKEY Date: 2024.05.09 10:26:32 -05'00'	
	Troy Stuckey / Date	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The focus of the inspection was to evaluate compliance with Toxic Substances Control Act (TSCA) Lead Based Paint (LBP) Renovation Repair and Paint (RRP) Rule and the 1018 Notification Rule. The company was identified during a larger effort to inspect companies that perform RRP or 1018 work in West Dallas in the general vicinity of RSR Corporation's smelter facility. The RSR Corporation operated a lead smelter that after shut-down became an EPA Superfund Site. Lead contaminants were removed between 1991 and 1994 and is currently undergoing redevelopment. EPA Region 6 prioritized this area to conduct TSCA RRP inspections to reduce potential of harm from lead-based paint in pre-1978 residences and verify compliance with TSCA regulations.

Fowler Property Management was identified as a company that manages pre-1978 target housing in the RSR area. The inspectors are not aware of any citizen complaints at this facility.

FACILITY DESCRIPTION

Fowler Property Management offers property owners rental management, home owner association and management, and property lease and sales services. The company operates in Dallas, Houston, and Kansas City. According to Fowler Property Managements website the company has 1,486 units under management.

Section II – OBSERVATIONS

On 03/19/2024 at approximately 1:00 PM, EPA inspectors Angela Hays and Stan Lancaster arrived at Fowler Property Management. The inspection was conducted to determine compliance with the RRP and 1018 Rule of TSCA. The inspection took place at the Fowler Property Management office in Dallas TX.

Upon arrival, the inspectors presented their credentials to Ms. Meagan Johnson. The inspectors informed Ms. Johnson of the purpose of the TSCA inspection, presented their credentials, and obtained signature on the Notice of Inspection Document (Appendix 1).

Fowler Property Management was able to provide documentation of the lease lead addendum and the EPA lead pamphlet provided to leasers.

The inspection checklist (Appendix 2) was completed during the inspection. How RRP work is performed was unknown by management. Follow up information was requested.

The inspection concluded with a brief explanation of the areas of as compliance requirements and a recap of information requested following the inspection.

Section III – AREAS OF CONCERN

No areas of concern were identified at the time of inspection. Additional information requested to demonstrate RRP compliance.

Section IV – FOLLOW UP

- 1) Number of pre-1978 properties managed by Fowler Property Management
- 2) Description of how RRP work is managed
- 3) Firm Certification number
- 4) Name, contact information, and training of contractors

Section V – LIST OF APPENDICES

Appendix 1 – NOI

Appendix 2 – Inspection Checklist

Appendix 1

Notice of Inspection



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection
Office of Enforcement and Compliance Assurance

1. Investigation Identification			3. Facility Name
Date 3-19-24	Inspection Number 2	Daily Seq. Number 2	Fowler Property Management
2. Inspector's Address 1201 Elm St Dallas TX 75201			4. Facility Address 1537 Singleton Blvd Dallas TX

For Internal EPA Use. Copies may be provided to the recipient as acknowledgment of this notice.

Reason for Inspection

Under the authority of Section 11 of the Toxic Substances Control Act

For the purpose of inspecting (including taking samples, photographs, statements and other inspection activities) an establishment, facility or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, control and facilities) and any conveyances being used to transport chemical substance, mixtures or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures or articles, within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial Data

☐ D. Personnel Data

☐ B. Sales Data

☐ E. Research Data

☐ C. Pricing Data

The nature and extent of inspection of such data specified in A through E above is as follows:

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Inspector's Signature <i>Angela Hays</i>		Recipient's Signature <i>Margan Johnson</i>	
Name Angela Hays		Name Margan Johnson	
Title Life Scientist	Date 3-19-24	Title Property Manager	Date 3/19/24

Appendix 2

Inspection Checklist



U.S. EPA

**Lead Renovation/Repair/Painting Compliance
Checklist – Property Management**
US ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TX 75202
**TOXIC SUBSTANCES CONTROL ACT
TITLE IV-LEAD HAZARD REDUCTION**

Inspection Checklist		
EPA Inspector Name	Angela Hays	
EPA Inspector Telephone	214 665 2285	
EPA Inspector Email	hays.angela@epa.gov	
Inspection Date	3-19-24	
Inspection Type:	LRP	
Inspection Location	1537 Singleton BLVD Dallas TX 75212	
Firm Information		
Company Name	Fowler Property Management	
Address	1537 Singleton Blvd Dallas TX 75212	
Contact Name	Maeagan Johnson	
Contact Telephone	972-460-6654	
Contact Email	DFWmanager@Fowler Property Management	
Manager Name	Maeagan Johnson	
Manager Telephone	972-460-6654	
Manager Email	DFWmanager@Fowler Property Management	
EPA Firm Certification Number	(Requested)	
	Y - N - N/A	Comments
Introduction & Purpose	Y	Agency Commitment
Permission to enter granted	Y	
Permission to enter document signed	Y	
Facility/operator provided copy of entry document	Y	
Copy of Lead Base Paint Pamphlet provided	N	Facility had copy

The items identified in this inspection have the potential to incur civil penalties in the amount identified. Your firm has 90 days in which to submit proof that the items identified have been corrected. These deficiencies are of a serious nature and if left uncorrected could result in formal enforcement action. Your response should be submitted to:

• (R) How many Properties are pre 1978 - Data missing after New System implemented
Reviewed Pamphlet and Addendum (CIR Requirements)

Copy of inspection checklist and on-site report sent to:

• (R) Firm Certification number - 3yrs of RRP.
• (R) Training for Contractors - Name's contact information

Print Name: Angela

Email: _____

Facility/Company Name: Fowler Property Management



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#	Reg Ref	Question	Y-N-N/A
1	40 CFR § 745.87(c)	Did the company permit entry for inspection?	Y
	Comments		
2	40 CFR § 745.87(c)	Did the company provide requested information and/or records during or after the inspection?	Y
	Comments	Facility will Follow up w/ RRP Documents	
3	40 CFR § 745.87(c)	Is this company a licensed real estate brokerage firm? If so, provide state licensing number in comments.	N
	Comments		
4	40 CFR § 745.87(c)	Does this company manage target housing?	Y
	Comments		
5	40 CFR § 745.87(c)	How many target housing properties does this company manage?	
	Comments	Facility will Follow up w/ info	
6	40 CFR § 745.87(c)	Are children under the age of 6 years living in any of these properties?	Y
	Comments		
7	40 CFR § 745.87(c)	Are pregnant women living in these properties?	
	Comments	Unknown	
8	40 CFR § 745.87(c)	Has renovation/repair/painting work been performed on these properties?	
	Comments	Facility will Follow up w/ info	
9	40 CFR § 745.87(c)	Which properties had RRP work performed and when? See List	
	Comments	Follow up	
10	40 C.F.R. § 745.84(a)(1)	Did the renovator or property manager provide the owner of the unit with the EPA-approved lead hazard information pamphlet?	
	Comments	Follow up	
11	40 C.F.R. § 745.84(a)(2)	Did the renovator or property manager provide the adult occupant of the unit (if not the owner) with the EPA-approved lead hazard information pamphlet?	
	Comments	Follow up	
12	40 C.F.R. § 745.84(b)(1)	In Common Areas, did the renovator or property manager provide the owner of the multi-family housing with the EPA-approved lead hazard information/pamphlet or to post informational signs?	
	Comments	Follow up	
13	40 C.F.R. § 745.84(b)(2)	In Common Areas, did the renovator or property manager notify in writing, or ensure written notification of, each unit of the multi-family housing and make the pamphlet available upon request prior to the start of the renovation, or to post informational signs?	
	Comments	Follow up	
14	40 C.F.R. § 745.84(c)(1)(i)	In renovation in Child-Occupied Facilities, did the renovator or property manager provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet?	
	Comments	Follow up	

Facility/Company Name: _____



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15	40 C.F.R. § 745.84(c)(1)(ii)	In renovation in Child-Occupied Facility, did the renovator or property manager provide an adult representative of the child-occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility?	
	Comments	<i>Follow up</i>	
16	40 C.F.R. § 745.84(c)(2)	In renovation in a Child-Occupied Facility did the renovator or property manager provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians?	
	Comments	<i>Follow up</i>	
17	40 C.F.R. § 745.85 (1).	For all renovations, did the renovator or property management firm post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until the renovation and the post-renovation cleaning verification have been completed?	
	Comments	<i>Follow up</i>	
18	40 CFR § 745.84(a)(1)(i)	Did the firm establish and maintain records and make those records available during the inspection?	
	Comments	<i>Follow up</i>	
19	40 CFR § 745.84(a)(1)(i)	Did the firm receive written acknowledgement from the owner for receipt of a lead education pamphlet?	
	Comments	<i>Follow up</i>	
20	40 CFR § 745.84(a)(2)(i)	Did the firm receive written acknowledgement from an adult occupant, of/for a lead education pamphlet?	
	Comments	<i>//</i>	
21	40 C.F.R. § 745.84(a)(2)	Did the firm provide the adult occupant of the unit (if not the owner) with the EPA-approved lead hazard information pamphlet?	
	Comments	<i>//</i>	
22	40 C.F.R. § 745.84(b)(1)	Did the renovator provide the owner of the multi-family housing with the EPA-approved lead hazard information/pamphlet or to post informational signs?	
	Comments	<i>//</i>	

Facility/Company Name: _____



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23	40 C.F.R. § 745.84(b)(2)	Did the renovator notify in writing, or ensure written notification of, each unit of the multi-family housing and make the pamphlet available upon request prior to the start of the renovation, or to post informational signs?	
	Comments	/ /	
24	40 C.F.R. § 745.84(c)(1)(i)	Did the renovator provide the owner of the building in which the child-occupied facility is located with the EPA-approved lead hazard information pamphlet?	
	Comments	/ /	
25	40 C.F.R. § 745.84(c)(1)(ii)	Did the renovator or owner provide an adult representative of the child-occupied facility with the pamphlet, if the owner is not the operator of the child-occupied facility?	
	Comments	/ /	
26	40 C.F.R. § 745.84(c)(2)	Did the renovator or owner provide the parents and/or guardians of children using the child-occupied facility with the pamphlet and information describing the general nature and locations of the renovation and the anticipated completion date, by mailing or hand-delivering the pamphlet and renovation information, or by posting informational signs describing the general nature and locations of the renovation and the anticipated completion date, posted in areas where they can be seen by parents or guardians of the children frequenting the child-occupied facility, and accompanied by a posted copy of the pamphlet or information on how interested parents or guardians can review a copy of the pamphlet or obtain a copy from the renovation firm at no cost to the parents or guardians?	
	Comments	/ /	
27	40 C.F.R. § 745.85 (1)	Did the renovator or property management firms post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area; to prepare, to the extent practicable, signs in the primary language of the occupants; and/or to post signs before beginning the renovation and make sure they remain in place and readable until the renovation and the post-renovation cleaning verification have been completed?	
	Comments	/ /	
28	40 C.F.R. § 745.84(a)(1)	During the renovation did the renovator obtain, from the owner, a written acknowledgment that the owner has received the pamphlet, pursuant to 40 C.F.R. § 745.84(a)(1)(i) or failure to obtain a certificate of mailing at least 7 days prior to the renovation?	
	Comments	/ /	
29	40 C.F.R. § 745.84(a)(2)	During the renovation did the renovator obtain, from the adult occupant, a written acknowledgment that the adult occupant has received the pamphlet, pursuant to 40 C.F.R. § 745.84(a)(2)(i) or failure to obtain a certificate of mailing at least 7 days prior to the renovation?	
	Comments	/ /	

Facility/Company Name: _____



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30	40 C.F.R. § 745.84(b)(1)(i) 40 C.F.R. § 745.84(b)(1)	During the renovation in Common Areas, did the renovator obtain, from the owner, a written acknowledgment that the owner had received the pamphlet, or that information signs had been posted, or they had obtained a certificate of mailing at least 7 days prior to the renovation?	
	Comments	//	
31	40 C.F.R. § 745.84(b)(3)	During the renovation in Common Areas, did the renovator prepare, sign, and date a statement describing the steps performed to notify all occupants of the intended renovation activities and offer to provide the pamphlet?	
	Comments	//	
32	40 C.F.R. § 745.84(b)(4)	During the renovation in Common Areas, did the renovator notify, in writing, the owners and occupants of the scope, locations or expected starting and ending dates of the planned renovation activities, before the renovator initiated work beyond that which was described in the original notice?	
	Comments	//	
33	40 C.F.R. § 745.84(c)(1)(i)	During renovation in a Child-Occupied Facility, did the renovator obtain, from the owner of the building, a written acknowledgment that the owner had received the pamphlet, or obtained a certificate of mailing at least 7 days prior to beginning the renovation?	
	Comments	//	
34	40 C.F.R. § 745.84(c)(1)(ii)	During renovation in Child-Occupied Facility, did the renovator obtain from an adult representative of the child-occupied facility, if the operator of the child-occupied facility is not the owner of the building, a written acknowledgment that the operator had received the pamphlet, or obtained a certificate of mailing at least 7 days prior to beginning the renovation?	
	Comments	//	
35	40 C.F.R. § 745.84(c)(3)	During renovation in Child-Occupied Facility, did the renovator prepare, sign and date a statement describing the steps performed to notify all parents and guardians of the intended renovation activities and to provide the pamphlet?	
	Comments	//	
36	40 C.F.R. § 745.84(d)(1)	During all renovations, did the renovator include a statement recording the owner or occupant's name and acknowledgement of receipt of the pamphlet prior to the start of the renovation, the address of the unit undergoing renovation, the signature of the owner or occupant as applicable, and the date of signature?	
	Comments	//	
37	40 C.F.R. § 745.84(d)(2) and (3)	During all renovations, did the renovator provide written acknowledgment of receipt of the pamphlet on either a separate sheet or as part of any written contract or service agreement for the renovation, and written in the same language as the text of the contract or agreement or lease or pamphlet?	

Facility/Company Name: _____

 U.S. EPA	Lead Renovation/Repair/Painting Compliance Checklist – Property Management US ENVIRONMENTAL PROTECTION AGENCY REGION 6, DALLAS, TX 75202 TOXIC SUBSTANCES CONTROL ACT TITLE IV-LEAD HAZARD REDUCTION
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	Comments	
38	40 C.F.R. § 745.86	During all Renovations, did the renovator or property manager retain all records necessary to demonstrate compliance with the residential property renovation for a period of 3 years following completion of the renovation activities?
	Comments	//
39	40 C.F.R. § 745.225 (i)	During all Renovations, did the renovator, or property manager implement a program to maintain and make available to EPA upon request, records for a period of 3 years and 6 months?
	Comments	//
40	40 C.F.R. § 745.225, 745.226, 745.227, 40 C.F.R. § 745.235 (b)	In Target Housing and Child-occupied Facilities, did the owner, renovator, or property manager establish, maintain, provide, copy, or permit access to records or reports?
	Comments	//

Target Housing

Major = one or more occupants under age 6 and/or pregnant woman

Significant = no information about age of the youngest occupant, or one or more occupants between ages of 6 and 17

Minor = no occupants under age 18

Child Occupied Facility

Major = one or more occupants under age 6 (by definition, a child-occupied facility is regularly visited by one or more children under 6)

Minor = renovation activities were completed during a period when children did not access the facility (e.g., as summer vacation) and there is no continuity of enrollment (i.e., the same children are not returning after the break).

Facility/Company Name: _____