

**Report on Renovation, Repair and Painting Rule Inspection to Determine Compliance  
with the Toxic Substances Control Act and 40 C.F.R. 745**

Company/Renovator Information

Company/Renovator Name: Elmington Property Management, LLC  
Street Address: 118 16<sup>th</sup> Avenue, Suite 200  
City, State Zip Code: Clarksville, Tennessee 37203  
Phone Number: 615-490-6731  
Email Address: Bklahn@elmingtonpm.com

Inspection Date: 11/15/2021

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.: 111521-OFO-02b

*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 EPA Region 4. Additional information may be requested to support the review. The inspected facility will be notified of the final compliance determination by EPA Region 4 in a follow-up letter.*

**I. Reason for Inspection:**

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

**II. Company Information**

- A. Company Name: Elmington Property Management, LLC
- B. Company Owner: Jillian Anderson
- C. Email Address:
- D. Firm Certification Number: No  
Certified Renovator on Staff: Yes ☐ No ☒

**III. Inspection Participants**

- ☒ Company Representative(s): Brienn Klahn
- ☒ U.S. EPA Inspector(s): Oyepero Olowu
- ☐ Other:

**IV. Objectives**

The objective of this inspection is to monitor compliance with the EPA Lead Renovation, Repair and Painting Rule promulgated under the TSCA Section 402(c) and the Pre-Renovation Education Rule under TSCA Section 406(b) pursuant to the Inspection Manual for the Lead Renovation, Repair and Painting Rule (September 2016) 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. Company Background**

Type of Company: Property Management Company  
Number of Employees: 39

**VI. Property Being Renovated Background**

- ☐ Single Family Detached
- ☐ Condominium
- ☐ Townhouse
- ☐ Co-op
- ☒ Multi-Family Home
- ☐ Commercial to Residential
- ☐ Not Applicable

**VII. 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: Brienn Klahn

Title: Executive Vice President, Corporate Operations

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**

- ☐ RRP Firm Certification(s):
- ☐ RRP Renovators Certification(s):
- ☐ Job Log
- ☐ RRP Renovation Record(s) and Contract(s) Available for Review
- ☒ No files available for review

Reason: The PMC had no knowledge of the RRP rule and as such had no RRP related documents for inspector to review.

**C. Additional Comments**

Work order reports were collected for review to determine applicability to the RRP rule.

**D. Closing Conference**

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

Company Representative: Brienn Klahn

Title: Executive Vice President, Corporate Operations

- ☒ 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

**VIII. 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