

**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: Las Olas Bay Properties 3200
84th Avenue LP – Firm Capital
Street Address: 163 Cartwright Ave
City, State, Zip: Toronto, ON M6A 1V5
Country: Canada
Phone Number: +1 416-635-0221
Email Address: jboulay@firmcapital.com

Location Information

Location Name: Summerfield Apartments
Location Street Address: 3200 NW 84th Avenue
Location City, State Zip: Sunrise, Florida 33351

Inspection Date: July 27, 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.: 07272021-OFO-05

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 – N/A, property managed by owner

- A. PM Company Name:
- B. PM Company Owner:
- C. Month and Year PM Company began managing the property:
- D. Is a PM Agreement in place:
 - Is a copy of the PM Agreement available:
- E. Email Address:

III. Property Ownership Information

- A. Company Name: Las Olas Bay Properties 3200 84th Avenue LP
- B. Company Owner: Firm Capital Corp.
- C. Email Address: jboulay@firmcapital.com

IV. Property Information

- A. Property Name: Summerfield Apartments
 - Year Company acquired the property: 2016
 - Was a Phase 1 Environmental Site Assessment Conducted: No
 - Is a copy available:
 - Has the property been tested for lead: No
 - Is the test available:
 - Has abatement work been conducted at the property: No
 - Is a report available:
 - Year built: 1974
 - Source of construction information: Tax Records

V. Inspection Participants

- ☒ Representative(s) and name of Company they represent: Jacqueline Boulay – Firm Capital
- ☒ U.S. EPA Inspector: Oyepero Olowu
- ☐ Other:

VI. 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.

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: Jacqueline Boulay

Title: Regional Director

Email address: jboulay@firmcapital.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
3200 NW 84 th Avenue, A-100, Sunrise Florida 33351	12/15/2020	1974	Initial
3212 NW 84 th Avenue, A-106, Sunrise Florida 33351	02/25/2021	1974	Initial
3214 NW 84 th Avenue, A-110, Sunrise Florida 33351	04/26/2021	1974	Initial
3222 NW 84 th Avenue, B-205, Sunrise Florida 33351	05/19/2021	1974	Initial
3222 NW 84 th Avenue, B-227, Sunrise Florida 33351	06/02/2021	1974	Initial
3224 NW 84 th Avenue, B-231, Sunrise Florida 33351	10/19/2020	1974	Initial
3230 NW 84 th Avenue, C-301, Sunrise Florida 33351	01/18/2021	1974	Initial
3232 NW 84 th Avenue, C-325, Sunrise Florida 33351	08/10/2020	1974	Initial
3244 NW 84 th Avenue, D-409, Sunrise Florida 33351	06/02/2021	1974	Initial
3244 NW 84 th Avenue, D-100, Sunrise Florida 33351	11/25/2020	1974	Initial
3252 NW 84 th Avenue, E-506, Sunrise Florida 33351	04/05/2020	1974	Initial
3254 NW 84 th Avenue, E-530, Sunrise Florida 33351	11/21/2019	1974	Initial
3262 NW 84 th Avenue, F-608, Sunrise Florida 33351	07/19/2021	1974	Initial
3264 NW 84 th Avenue, F-609, Sunrise Florida 33351	11/30/2020	1974	Initial
3260 NW 84 th Avenue, F-624, Sunrise Florida 33351	05/05/2021	1974	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: Jacqueline Boulay

Title: Regional Manager

- ☐ 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