

**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: Zeitlin Sotheby's International Realty

Street Address: 4301 Hillsboro Road, #100

City, State, Zip: Nashville, Tennessee 37215

Phone Number: (615) 383-0183

Email Address: sam@zeitlin.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-02

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: Zeitlin Sotheby's International Realty
- B. PM Company Owner: NA
- C. Month and Year PM Company began managing the property: NA
- 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:
- B. Company Owner:
- C. Email Address:

IV. Property Information

- A. Property Name: NA (several)
 - Year Company acquired the property:
 - Was a Phase 1 Environmental Site Assessment Conducted:
 - Is a copy available:
 - Has the property been tested for lead:
 - Is the test available:
 - Has abatement work been conducted at the property:
 - Is a report available:
 - Year built:
 - Source of construction information:

V. Inspection Participants

- ☒ Representative(s) and name of Company they represent: Sam Averbuch and Eliza Ann Price; Zeitlin Sotheby's International Realty
- ☒ 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: Sam Averbuch

Title: Chief Operations Officer (COO)

Email address: sam@zeitlin.com

Company Representative: Eliza Ann Price

Title: Director of Operations

Email address: eliza.ann@zeitlin.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:

#	Addresses of Property Sold: #1-10 Addresses of Properties being Leased: #11-20	Date of Contract	Year Built Source of Information	Initial Lease or Lease Renewal
1	818 Cammack Court, Nashville TN 37205	6/18/2021	Tax Records	Initial
2	202 Carden Avenue, Nashville TN 37205	12/31/2020	Tax Records	Initial
3	3849 Saunders Avenue, Nashville TN 37216	8/6/2020	Tax Records	Initial
4	108 Stirton Road, Nashville TN 37210	3/10/2021	Tax Records	Initial
5	510 Gay Street, #901, Nashville TN 37219	1/14/2020	Tax Records	Initial
6	102 Lasalle Court, Nashville TN 37205	8/28/2020	Tax Records	Initial
7	106 Fairview Drive, Mount Pleasant TN38474	6/26/2020	Tax Records	Initial
8	907 Douglas Avenue, Nashville TN 37206	6/4/2021	Tax Records	Initial
9	3738 Whitland Avenue, Nashville TN 37205	6/9/2021	Tax Records	Initial
10	5128 Pritchett Drive, Nashville TN 37220	6/9/2021	Tax Records	Initial
11	2911 Windermere Circle, Nashville TN 37214	12/23/2020	Tax Records	Initial
12	2819 Belcourt Avenue Nashville TN 37214	11/3/2020	Tax Records	Initial
13	1704 Sherwood Lane, Nashville TN 37216	6/24/2020	Tax Records	Initial
14	1006 Indian Springs Road, Pegram TN 37143	9/24/2020	Tax Records	Initial
15	921 Chickasaw Avenue, Nashville TN 37207	5/4/2021	Tax Records	Initial
16	608 Plantation Court, Nashville TN 37221	3/31/2021	Tax Records	Initial
17	304 Edith Avenue, Nashville TN 37207	12/4/2020	Tax Records	Initial

18	212 Chestnut Lane, Franklin TN 37064	9/29/2020	Tax Records	Initial
19	2816 Hody Drive, Nashville TN 37206	6/17/2020	Tax Records	Initial
20	4487 Post Place Unit 151, Nashville TN 37205	8/21/2019	Tax Records	Initial

- ☒ Other documents collected
Type: Filing for registration of assumed name for business transactions
- ☐ No files available for review
Reason:

C. Additional Comments

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

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