



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 15 2019

UNITED PARCEL SERVICE

Mr. Tobin Faciane
Safety Specialist
Santa Rosa County District Schools
6032 Highway 90
Milton, Florida 32570

Dear Mr. Faciane:

Enclosed is a copy of the final inspection report generated by the U.S. Environmental Protection Agency's Region 4 Land, Asbestos and Lead Section for the on-site inspection conducted on July 18, 2019, at 6032 Highway 90, Milton, Florida. The inspection was conducted in accordance with Section 11 of the Toxic Substances Control Act (TSCA) to determine compliance with the Asbestos Hazardous Emergency Response Act (AHERA) regulations promulgated at 40 C.F.R. Part 763. During the inspection, your company did not assert any claims of Confidential Business Information that impacts the information contained in this report. In your review of the report, if you have any questions, please contact the inspector listed below:

Yvonne Lawson
Land, Asbestos and Lead Section
U.S. EPA Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303-8960
(404) 562 - 9205

Additionally, if you have any questions regarding the inspection report, please contact either the inspector or me at (404) 562-8610 or by email at annicella.alan@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Alan A. Annicella", is positioned above the typed name.

Alan A. Annicella
Section Chief
Land, Asbestos and Lead Section

Enclosure



U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
61 Forsyth Street, SW
Atlanta, GA 30303-8960

INSPECTION REPORT

Entity Inspected Santa Rosa County District Schools
6032 Highway 90
Milton, Florida 32570

Inspection Type Toxic Substances Control Act (TSCA)
Asbestos Hazard Emergency Response Act (AHERA)

Inspection Date July 18, 2019

Inspection No. 07182019-F19031-01

Inspector Yvonne Lawson

Introduction

A neutral scheme compliance inspection pursuant to Section 11 of TSCA was conducted on July 18, 2019, at the Santa Rosa County District Schools Local Education Agency (LEA) administrative office. The inspection was conducted by Ms. Yvonne Lawson, who is an employee of the U.S. Environmental Protection Agency, Region 4, and is an Inspector for the TSCA AHERA program. The purpose of the inspection was to determine compliance with TSCA AHERA and the regulations promulgated at 40 C.F.R. Part 763, "Asbestos-Containing Materials in School Rule", hereinafter referred to as AHERA.

On July 11, 2019, Ms. Lawson contacted Mr. Tobin Faciane, Safety Specialist at Santa Rosa County District Schools (the District), to schedule the inspection. Ms. Lawson confirmed the inspection date and time with Mr. Faciane and informed him that she would inspect AHERA Management Plans (AMPs) for several schools which are under control of the LEA and perform a visual walk-through inspection at each.

Inspection

Entry and Opening Conference

The records review inspection took place on July 18, 2019, in the Santa Rosa County District Schools administrative office located at 6032 Highway 90, Milton, Florida. Upon entry, Ms. Lawson introduced herself and presented her EPA inspection credentials to Mr. Faciane and Ms. Pamela Smith, Risk Manager at the District, who each participated in the opening conference. Ms. Lawson also presented a TSCA Notice of Inspection form and a TSCA Confidentiality Notice to Ms. Smith, who signed both forms.

During the opening conference, Ms. Lawson explained that the inspection would include a review of the LEA's AMPs for Bagdad Elementary School, M.L. King Middle School, and Milton High School; an AHERA visual walk-through inspection at each school; and a closing conference. Ms. Lawson interviewed the LEA's staff regarding the LEA and required contents of the AMPs.

LEA Information

Santa Rosa County District Schools is a public LEA which encompasses 31 schools with approximately 31,000 students currently enrolled. Ms. Smith stated that Mr. Faciane is the LEA Designated Person for the District.

Management Plans Review

Mr. Faciane provided Ms. Lawson with the AMPs for Bagdad Elementary School, M.L. King Middle School, and Milton High School, as requested. Ms. Lawson verified that an AMP for each school was on file in the District's administrative office. Upon review of the LEA's AMPs, Ms. Lawson observed that they were incomplete and did not include required updated records. Mr. Faciane stated that the office recently underwent a move and records are stored in boxes at another facility. Ms. Lawson observed the following deficiencies:

- 1) Documentation of an initial AHERA inspection conducted at each school by an accredited inspector identifying all locations of friable and nonfriable asbestos-containing building materials (ACBMs) was not included in the LEA's District AMPs onsite.
- 2) Documentation of the original accredited inspector and management planner's information and credentials for each school was not included in the LEA's District AMPs onsite.
- 3) The schools' AMPs do not mirror the LEA's District AMPs. Each AMP at the LEA District office as well as the schools' administrative office was incomplete and did not include all required records. Thus, the LEA did not maintain required records.

Bagdad Elementary School

Bagdad Elementary School is located at 4512 Forsyth Street, Bagdad, Florida. The original structure was constructed in 1925. The LEA is a public school with students enrolled in grades Pre-K - 5.

Management Plan Review

Ms. Lawson requested to review Bagdad Elementary School's AMP, which was available in the school's administrative office. Upon review of the LEA's AMP, Ms. Lawson observed that it was incomplete and did not include required updated records. Ms. Lawson observed the following deficiencies:

- 1) Documentation of an initial AHERA inspection conducted at the school by an accredited inspector identifying all locations of friable and nonfriable ACBMs in the school was not included in the school's AMP onsite.
- 2) Documentation of the original accredited inspector and management planner's information and credentials was not included in the school's AMP onsite.

School Tour

As requested, Mr. Faciane provided Ms. Lawson with a tour of Bagdad Elementary School. Ms. Lawson conducted the AHERA visual walk-through inspection using an AHERA inspection checklist and observed locations of asbestos-containing building materials documented in the LEA's AMP.

M. L. King Middle School

M. L. King Middle School is located at 5928 Stewart Street, Milton, Florida. The original school building was constructed in 1971. The LEA is a public school with students enrolled in grades 6-8.

Management Plan Review

Ms. Lawson requested to review M. L. King Middle School 's AMP, which was available in the school's administrative office. Upon review of the LEA's AMP, Ms. Lawson observed that it was incomplete and did not include required updated records. Ms. Lawson observed the following deficiency:

Documentation of required two-hour asbestos awareness training records for the AHERA Designated Person and all maintenance and custodial staff were not included in the school's AMP onsite.

School Tour

As requested, Mr. Faciane provided Ms. Lawson with a tour of M. L. King Middle School. Ms. Lawson conducted the AHERA visual walk-through inspection using an AHERA inspection checklist and observed locations of asbestos-containing building materials documented in the LEA's AMP.

Milton High School

Milton High School is located at 5445 Stewart Street, Milton, Florida. It is a public high school with students enrolled in grades 9-12. The original school building was constructed in 1952.

Management Plan Review

Ms. Lawson requested to review Milton High School 's AMP, which was available in the school's administrative office. Upon review of the LEA's AMP, Ms. Lawson observed that it was incomplete and did not include required updated records. Ms. Lawson observed the following deficiencies:

- 1) Documentation of the original accredited management planner's information and credentials was not included in the school's AMP onsite.
- 2) Documentation of required two-hour asbestos awareness training records for the AHERA Designated Person and all maintenance and custodial staff were not included in the school's AMP onsite.

School Tour

As requested, Mr. Faciane provided Ms. Lawson with a tour of Milton High School. Ms. Lawson conducted the AHERA visual walk-through visual inspection using an AHERA inspection checklist and observed locations of asbestos-containing building materials documented in the LEA's AMP.

Closing Conference

Ms. Lawson held the closing conference in the administrative office of the LEA with Mr. Faciane. Ms. Lawson reviewed the preliminary findings prior to the closing conference and completed a Summary of Observations form. The summary of observations was discussed with and presented to Mr. Faciane, who signed the form.

Ms. Lawson indicated that upon returning to the office, EPA's next step would be to review the observations and, if warranted, issue a Notice of Noncompliance indicating any actual violation(s) that the LEA would need to correct, and to prepare an inspection report which would be mailed to the LEA within 30 days.

Ms. Lawson provided the LEA with copies of the following documents during the conclusion of the closing conference:

- Signed TSCA Notice of Inspection
- Signed TSCA Inspection Confidentiality Notice
- Signed Summary of Observations

Findings

Based on statements and information provided by the LEA and the AHERA walk-through, the findings are as follows:

- LEA failed to conduct an AHERA inspection, pursuant to 40 C.F.R. Part 763.
- LEA failed to maintain required records, pursuant to 40 C.F.R. Part 763.

Report Approval

Report - Author



Yvonne Lawson
Inspector
U.S. EPA Region 4
Land, Asbestos and Lead Section



Date

Report - Approver



Alan A. Annicella
Chief
U.S. EPA Region 4
Land, Asbestos and Lead Section



Date