



Department of the Interior - Indian Affairs
2016 Environmental Management Assessment and Performance Program

Division of Environmental and Cultural Resources Management
 12220 Sunrise Valley Drive
 Reston, Virginia 20191

Audit Start Date 7/11/2016 : Audit Completion Date 7/13/2016

F53-15 Fond du Lac Ojibwa School (K-12)-GD

Audit Report

Print Date 7/12/2016

Auditor Certification

I John P. French, certify that to the best of my knowledge and belief, I do not have any personal, financial, or organizational conflicts of interest that will compromise, in any way, the performance of this Audit, including but not limited to, current or previous employment at the facility being audited. Additionally, if applicable, I meet the requirements set forth in 18 U.S.C. § 207, Post-Employment Restrictions. If a conflict of interest is determined to exist, I will immediately remove myself from the audit process with full disclosure of the interest, direct or indirect, to the IA Contractor Officer's Representative.

John P. French
Auditor

7-13-16

I, John French, conducted the environmental compliance audit in accordance with the relevant provisions of Appendix A of the United States Environmental Protection Agency Consent Agreement and Final Order, signed August 18, 2011, and the Audit Plan.

John P. French
Auditor

7-13-16
Date

Facility Acceptance

I Tara DuPuis have been briefed on the results of this EMAP Audit to include both environmental compliance and environmental management system (EMS) conformance findings. I have also been provided a copy of the EMAP report.

Tara DuPuis
Signature

Principal
Title

7/13/16
Date



Location Information	Senior Line Official, Address and Phone Number
F53-15 Fond du Lac Ojibwa School (K-12)-GD F50-01a Minneapolis ELO	Jennifer Johnson, Superintendent 49 University Road Cloquet, MN 56359 218-878-7258

Name and Position of On-Site Representatives	Date of Last EPA Inspection (if known)
Jennifer Johnson, Superintendent, 218-878-7258, jenniferjohnson@fdlrez.com Dan Anderson, Grant/Accountability Manager, 218-878-7259, dananderson@fdlrez.com Valerie Grover, CALIBRE, 210-823-5398, valerie.grover@calibresys.com Nancy Scribner, BIA escort, 715-682-4527, nancy.scribner@bia.gov	2008 Pesticide/TSCA

Purpose and Assessment Time Frame

The purpose of the environmental assessment is to verify environmental compliance status. The assessment timeframe is from the present to the past five years.

Priority Ranking of Assessment Findings and Timeframe

- P5: Emergency Action - Immediate response to protect health, safety or environment; 24-hour action with DECRM approval**
- P1: Health or Safety Concerns - Fully corrected 0 - 90 days; CAP to EPA in 0 - 30 days if under EPA CAFO**
- P2: Regulatory Liability (Criminal/Civil Penalties) - Fully corrected 0 - 90 days; CAP to EPA in 0 - 30 days if under EPA CAFO**
- P3: E.O. Statutory, Administrative or Mission - Fully corrected 0 - 120 days**
- P4: Good Engineering/Best Mgt Practice - Fully corrected 0 - 180 days**

Auditor Comments (Include a description of the information reviewed, the on-site activities conducted, a description of any problems or difficulties in conducting the assessment, and measures taken to address the problems)

Fond du Lac (FDL) Ojibwe School (K-12) is located in Cloquet, MN, on the Fond du Lac Reservation. The school is grant day school that serves approximately 260 students with a staff of approximately 77. The entrance briefing was attended by representatives listed on the previous page.

Prior to the audit, the auditor reviewed the school's pre-visit questionnaire, previous EMAP audit reports, the EMS SharePoint website, and EPA ECHO website. During the audit, additional environmental documents and records, which were available in hard copy format in various environmental manuals maintained by the Grant/Accountability Manager, were reviewed. Documents reviewed included: the Asbestos Management Plan, which is maintained in the Grant/Accountability Manager's office; Standard Operating Procedures (SOPs) and associated training records for SOPs; annual EMS awareness training material and training records, hazardous communication plan, COOP, new source evaluation documents, chiller maintenance records and documentation service conducted by EPA certified technician, and associated records for used lamp recycling, used oil recycling, used oil filter recycling, and disposal records.

The auditor performed a detailed walkthrough and review of the school's operations and activities. The school includes the main school building (22), two Family and Child Education buildings (20 & 21), one student shop building (25), two garages (19 & 23), concession building (24), and a bus maintenance garage (18). School operations include administration, classrooms, computer lab, library, kitchen/cafeteria, building maintenance, janitorial services, grounds maintenance, outdoor recreation areas, and bus service and maintenance. The school does not have any underground storage tanks (USTs) or floor drains that do not discharge to the local sewer system. The school does have above ground tanks for the storage of used oil (250 gallons), propane (500 gallons), and diesel (308 gallons) associated with the emergency generator.

Drinking water is supplied by the City of Cloquet and no drinking water treatment or storage is performed on site. Wastewater is discharged to the City of Cloquet treatment system, solid waste and recycling service is provided by Waste Management, and Minnesota Power provides electricity to the school.

The school has implemented its EMS and the Grant/Accountability Manager has done a very good job of reviewing and updating the EMS website. The school has done an excellent job of using the EMS SharePoint website as the repository for the school's environmental information. The school has identified 18 environmental aspects (none rank as significant) and four objectives and targets that have been reviewed and updated annually. EMS, environmental compliance, and sustainability information is communicated annually at the school's staff and faculty orientation meetings. The most recent orientation was conducted at the start of the 2015-2016 school year and included the Indian Affairs Environmental Policy, EMS, the Asbestos Management Plan, SOPs for waste disposal (antifreeze, batteries, paint, electronics, fluorescent lamps, used oil, etc.), documentation of green purchasing and the Green Purchasing Policy, recycling, chemical inventories, vermicomposting, and green cleaning supplies. The Indian Affairs Environmental Policy is posted throughout the school.

The school has a robust recycling program and has diverted over 10,000 pounds of waste from the landfill. Recycling streams include plastic, glass, paper, aluminum, cardboard, ink cartridges, toner cartridges, used oil and used oil filters. The school has minimized chemicals used in janitorial operations, purchases non-toxic cleaning supplies and maintains a chemical inventory with Safety Data Sheets that are reviewed and updated annually. The school has identified some unused chemicals and aerosol cans, and these have been staged for transport to the Clean Shop program through the Western Lake Superior Sanitation District (WLSSD) for recycling/reuse and/or proper disposal.

Used oil drums were properly labeled and used oil filters were collected for recycling. The floor drains in the Bus Garage vehicle wash bay are connected to a holding tank which is emptied by Mielke.

The school has implemented several energy/water conservation measures to include lighting retrofits, an occupancy-sensing blower in the gymnasium, motion operated sinks, and an energy management software system for the school building.

The school has two natural gas fired boilers and an emergency diesel generator. With the assistance of the FDL Natural Resource Department, calculations to determine if the boilers or generator require registration under the New Source Performance Standards (NSPS) have been done and the appropriate minor sources have been registered with the EPA.

The FDL Natural Resource Department also educated the school children on environmental topics and supports the school in several environmental areas.

Facilities personnel have done an excellent job in providing annual environmental and EMS training to staff, and implementing the EMS.



Audit Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John



Audit Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
40 CFR 273.13(d)(1)	P2	F53-15_7-2016_MM_1	2. Lack of Operational Controls (EMS Element 10)	14

Location	Bldg Construction Date	Program Area(s)
Bldg. 22	2002	Facilities *

Suspected AON

1. Failure to store universal waste in a manner that prevents releases to the environment. 40 CFR 273.13(d)(1) (RCRA) (CAFO)

Assessor's Comments

Spent florescent lamps were not properly stored in sound containers. Staff indicated these lamps had been in open container for approximately two weeks.

Recommended Corrective Actions

Ensure that universal waste are managed in closed, structurally sound containers, adequate to prevent breakage, that lack evidence of leakage or damage. Develop a procedure to manage universal waste that prevents releases to the environment, provides instructions on immediate clean-up action if releases occur, and directions for staging universal waste, labeling waste containers with name of wastes and start accumulation dates, and how to dispose of these wastes. Train employees on this procedure and maintain a copy in the file location specified in the EMS.



Audit: Spent lamps not properly stored.



Audit Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
40 CFR 265 & 40 CFR 265.171	P2	F53-15_7-2016_MM_3	2. Lack of Operational Controls (EMS Element 10)	Unknown

Location	Bldg Construction Date	Program Area(s)
Bldg. 22	2002	Facilities *

Suspected AON

3. Failure to transfer the broken spent fluorescent lamp to a container in good condition. 40 CFR 265; 40 CFR 262.34(a)(1)(i); 40 CFR 265.171 (RCRA)

Assessor's Comments

Staff have failed to clean up a broken fluorescent lamp. Unable to determine days of noncompliance.

Recommended Corrective Actions

Upon discovery, immediately transfer the spent fluorescent lamp to a container that is structurally sound, adequate to prevent leakage or damage. Date and label the container with the words Hazardous Waste.



Audit: Broken lamp in bottom of waste container.



Audit Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
40 CFR 273.15(c)	P2	F53-15_7-2016_MM_9	2. Lack of Operational Controls (EMS Element 10)	Unknown

Location	Bldg Construction Date	Program Area(s)
Bldg. 23	2002	Facilities *

Suspected AON

9. Failure to document the length of time universal wastes have been accumulating as a waste. 40 CFR 273.15(c) (RCRA) (CAFO)

Assessor's Comments

Containers of spend lamps were not properly labeled with accumulation start dates. Days of noncompliance could not be determined.

Recommended Corrective Actions

Label universal waste containers with the accumulation start date to verify the length of time batteries, lamps or thermostats have accumulated as a waste. Develop a procedure for universal waste management that identifies how universal waste will be labeled from start of generation to disposal. Some suggestions are: place the waste in a container and mark/label the container with the start date the material became a waste; or mark/label each individual item with the date it became a waste or was received; or maintain a log or inventory system on-site that identifies the date each universal waste became a waste or was received. Maintain the standard operating procedure in the record location specified in the EMS



Audit: Accumulation start date missing on spend lamp containers.



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FollowUp Audit Report

FollowUp Audit Date: 09/12/2016

F53-15 Fond du Lac Ojibwa School (K-12)-GD

Audit Start Date 7/11/2016 : Audit Completion Date 7/13/2016

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Purpose and Assessment Time Frame	
<p>The purpose of the environmental assessment is to verify environmental compliance status. The assessment timeframe is from the present to the past five years.</p>	
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The FDL Natural Resource Department also educated the school children on environmental topics and supports the

school in several environmental areas.

Facilities personnel have done an excellent job in providing annual environmental and EMS training to staff, and implementing the EMS.

Follow-Up Visit: The EMAP Audit Follow-up Visit at Fond du Lac Ojibwe School was conducted on September 12, 2016. The purpose of the Follow-up Visit was to verify progress in implementing corrective and preventive action plans and to assess the appropriateness of the actions taken. The closure status of all audit findings was reviewed and documented in the Follow-up Report and reflected in Compliance Tracker. The School has done an excellent job in addressing all findings and all audit findings have been closed.



FollowUp Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John



FollowUp Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
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Location	Bldg Construction Date	Program Area(s)
Bldg. 22	2002	Facilities *

Suspected AON

1. Failure to store universal waste in a manner that prevents releases to the environment. 40 CFR 273.13(d)(1) (RCRA) (CAFO)

Assessor's Comments

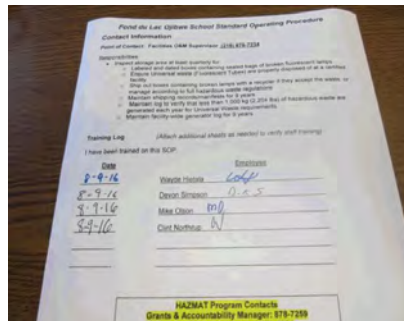
Spent florescent lamps were not properly stored in sound containers. Staff indicated these lamps had been in open container for approximately two weeks.

Recommended Corrective Actions

Ensure that universal waste are managed in closed, structurally sound containers, adequate to prevent breakage, that lack evidence of leakage or damage. Develop a procedure to manage universal waste that prevents releases to the environment, provides instructions on immediate clean-up action if releases occur, and directions for staging universal waste, labeling waste containers with name of wastes and start accumulation dates, and how to dispose of these wastes. Train employees on this procedure and maintain a copy in the file location specified in the EMS.



Follow-Up Visit: Spent lamps properly stored in sound containers.



Follow-Up Visit: Record of training of maintenance and custodial staff on spent fluorescent lamps.



Audit: Spent lamps not properly stored.

Action Required Date	Closed Date	Action Taken	Status
10/11/2016	9/12/2016	Spent lamps at the School have been put into sound containers.	Completed

Action Taken to Address Root Cause

Maintenance and custodial staff were trained on 8/9/2016 on proper management of spent fluorescent lamps. In addition, this responsibility has been assigned on the EMRR spreadsheet.



FollowUp Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
40 CFR 265 & 40 CFR 265.171	P2	F53-15_7-2016_MM_3	2. Lack of Operational Controls (EMS Element 10)	Unknown
Location	Bldg Construction Date	Program Area(s)		
Bldg. 22	2002	Facilities *		

Suspected AON

3. Failure to transfer the broken spent fluorescent lamp to a container in good condition. 40 CFR 265; 40 CFR 262.34(a)(1)(i); 40 CFR 265.171 (RCRA)

Assessor's Comments

Staff have failed to clean up a broken fluorescent lamp. Unable to determine days of noncompliance.

Recommended Corrective Actions

Upon discovery, immediately transfer the spent fluorescent lamp to a container that is structurally sound, adequate to prevent leakage or damage. Date and label the container with the words Hazardous Waste.



Follow-Up Visit: Broken lamp properly cleaned up.



Audit: Broken lamp in bottom of waste container.

Action Required Date	Closed Date	Action Taken	Status
10/11/2016	9/12/2016	The broken spent lamp has been properly cleaned up and put into sound container for recycling.	Completed

Action Taken to Address Root Cause

Maintenance and custodial staff were trained on 8/9/2016 on proper management of spent fluorescent lamps. In addition, this responsibility has been assigned on the EMRR spreadsheet.



FollowUp Report



F53-15 Fond du Lac Ojibwa School (K-12)-GD on 7/11/2016 - 7/13/2016 (EMAP (v 2015)) by Frerich, John

Miscellaneous Wastes

Reference	Priority	Finding #	Root Cause	Days of N.C.
40 CFR 273.15(c)	P2	F53-15_7-2016_MM_9	2. Lack of Operational Controls (EMS Element 10)	Unknown

Location	Bldg Construction Date	Program Area(s)
Bldg. 23	2002	Facilities *

Suspected AON

9. Failure to document the length of time universal wastes have been accumulating as a waste. 40 CFR 273.15(c) (RCRA) (CAFO)

Assessor's Comments

Containers of spent lamps were not properly labeled with accumulation start dates. Days of noncompliance could not be determined.

Recommended Corrective Actions

Label universal waste containers with the accumulation start date to verify the length of time batteries, lamps or thermostats have accumulated as a waste. Develop a procedure for universal waste management that identifies how universal waste will be labeled from start of generation to disposal. Some suggestions are: place the waste in a container and mark/label the container with the start date the material became a waste; or mark/label each individual item with the date it became a waste or was received; or maintain a log or inventory system on-site that identifies the date each universal waste became a waste or was received. Maintain the standard operating procedure in the record location specified in the EMS



Follow-Up Visit: Spent lamps properly labeled with accumulation start date.



Audit: Accumulation start date missing on spent lamp containers.

Action Required Date	Closed Date	Action Taken	Status
10/11/2016	9/12/2016	All containers of spent lamps at the School have been properly labeled with accumulation start dates.	Completed

Action Taken to Address Root Cause

Maintenance and custodial staff were trained on 8/9/2016 on proper management of spent fluorescent lamps. In addition, this responsibility has been assigned on the EMRR spreadsheet.