



## **AHERA Asbestos Management Plan**

American Academy of Innovation  
5410 W. South Jordan Parkway  
South Jordan, UT 84009

## Overview

The purpose of this document is to comply with Utah Division of Air Quality (DAQ) and federal requirements for the Asbestos Hazard Emergency Response Act (AHERA).

## Local Education Agency and School Information

LEA/School Name:	American Academy of Innovation
LEA/School Address:	5410 W South Jordan Parkway South Jordan, UT 84009
LEA/School County:	Salt Lake County
LEA/School Telephone Number:	801-810-4786

## Designated Person Information

Name of Designated Person:	Scott Jones, Director
Telephone Number:	801-810-4786
Address:	American Academy of Innovation 5410 W South Jordan Pkwy South Jordan, UT 84009

## Architect's Letter

Attached is a letter from the building architect. With this letter, other requirements, including training of school and janitorial staff, are deemed as not required.

1 May 2025

Robert Warren  
American Academy of Innovation  
5410 South Jordan Parkway  
South Jordan, UT 84009

Re: American Academy of Innovation Asbestos Management Plan

Dear Mr. Warren,

Babcock Design served as the architect for the American Academy of Innovation, a project designed and constructed between 2015 and 2016. A classroom addition was subsequently completed in 2020. During these periods, I held the position of architectural project manager for the undertaking.

As you know, the Environmental Protection Agency (EPA) initiated regulations concerning the use of asbestos in construction materials beginning in the 1970s. Consequently, its application has significantly diminished over the years due to increasing public awareness of the associated health risks.

At the time of the American Academy of Innovation's construction, the majority of building material manufacturers had ceased incorporating asbestos into their products. To the best of our knowledge and based on the information available to us at that time, no asbestos-containing materials were specified or utilized in the construction of the school building.

Sincerely,



Wesley Baker  
Principal



**BABCOCK DESIGN**

SALT LAKE CITY 52 EXCHANGE PLACE SALT LAKE CITY, UT 84111 801.531.1144 | BOISE 800 WEST MAIN STREET SUITE 940 BOISE, ID 83702 208.424.7675 | [BABCOCKDESIGN.COM](http://BABCOCKDESIGN.COM)

## **Inspection Report(s) and Reviews**

Attached are the inspection reports and reviews to date.



## U.S. Environmental Protection Agency Region 8 AHERA INSPECTION CHECKLIST

Name & Address of Inspector(s) <b>Jared James</b> 195 North 1950 West Salt Lake City, UT 84114-4820		Name & Address of LEA: <b>AMERICAN ACADEMY OF INNOVATION</b> 5410 W. SOUTH JORDAN Pkwy SOUTH JORDAN, UT 84009	
phone: <b>385-306-6501</b> email: <b>jsjames@utah.gov</b>		phone: <b>801-810-4786</b> email:	
Insp. (ICIS) no. <b>JJ-0008</b>	Prev. Insp. Date	Name & Title of CEO	
Insp Date & Time <b>APRIL 29, 2025 9 AM</b>		Name & Title of AHERA DP	

### OPENING CONFERENCE

Credentials presented to:

Notice of Inspection presented to & signed by:

LEA personnel attending:

**ROBERT WARREN**

Other State/Local/Tribal Officials attending:

LEA data:

Type ☒ Public ☐ Private ☐ Other \_\_\_\_\_

No. of schools/buildings: \_\_\_\_\_ No. of Staff \_\_\_\_\_

No. of students: \_\_\_\_\_ % Native American: \_\_\_\_\_

Reason for Inspection: (explain)

Neutral scheme: ☒ Random ☐ Selected

For Cause: ☐ Tip / Complaint ☐ Referral

EPA Enforcement Initiative ☐

Sequence of inspection activities and expected outcomes explained:

---

---



## U.S. Environmental Protection Agency Region 8 ASBESTOS INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. §763.85, 92. Inspection and reinspections

##### Regulatory requirement

##### Observations

- 1 LEA must inspect each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and nonfriable ACBM, as required by 40 C.F.R. § 763.85(a)(1).
- 2 LEA must conduct a reinspection of all friable and nonfriable known or assumed ACBM in each school building that they lease, own, or otherwise use as a school building, at least once every three years as required by 40 C.F.R. § 763.85(b)(1).
- 3 LEA must conduct a periodic surveillance in each building that it leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM at least once every six months, as required by 40 C.F.R. § 763.92(b)(1).

Original inspection: date, author, accreditation

THE SCHOOL WAS BUILT IN 2016. LEA  
WILL CONTACT ARCHITECT FOR THE  
EXEMPTION LETTER

Most recent reinspection: date, author, accreditation

Most recent periodic surveillance: date, performed by

#### 40 C.F.R. §763.93 Management Plans

- 4 LEA must develop an asbestos management plan for each school, including all buildings that they lease, own, or otherwise use as school buildings, and submit the plan to an Agency designated by the Governor of the State in which the LEA is located, as required by 40 C.F.R. § 763.93(a)(1).
- 5 LEA must maintain in its administrative office a complete, updated copy of a management plan for each school under its administrative control or direction as required by 40 C.F.R. § 763.93(g)(2).

Original management plan: date, author, accreditation

WILL MAKE WHEN EXEMPTION LETTER  
IS RECEIVED

#### 40 C.F.R. 763 §93 Management Plans - continued

##### Regulatory requirement

##### Observations

- 6 LEA must update its management plan to keep it current with ongoing operations and maintenance, periodic surveillance, inspection, reinspection, and response activities as required under 40 C.F.R. § 763.93(d).

Most recent MP update: date, author, certi



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. §763.91 Operations and Maintenance

- 7 LEA must develop and implement an operations and maintenance (O&M) plan whenever any friable ACBM is present or assumed to be present in a building that the LEA leases, owns, or otherwise uses as a school building, as required by 40 C.F.R. § 763.91(a).

WILL OBTAIN EXEMPTION LETTER

- 8 LEA must maintain records of O&M activities to include description of the activity, the name of each person involved, start & end dates, location(s), preventive measures used, and if ACM is removed, the name and location of storage or disposal site of the ACM, as required by 40 C.F.R. § 763.94(f).

#### 40 C.F.R. §763.90 Response Actions

- 9 LEA must select and implement appropriate response actions in a timely manner. The selected response actions must be sufficient to protect human health or the environment, as required by 40 C.F.R. § 763.93(e) and § 763.90.

- 10 LEA must maintain records of response actions to include description of the actions taken, methods used, names of all persons involved, start & end dates, location(s), preventive measures used, and if ACM is removed, the name and location of storage or disposal site of the ACM, as required by 40 C.F.R. § 763.94(f).



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. § 763.84(g) Designated Person

- | Regulatory requirement   | Observations  |
|--|---|
| 11 LEA must designate a person to ensure that the requirements of the ASHERA regulations are properly implemented as required by 40 C.F.R. § 763.84(g)(1).   | Date of letter of designation:<br><u>A DESIGNATED PERSON WILL BE ASSIGNED</u> |
| 12 LEA must ensure that each management plan contains a "true and correct" statement, signed by the individual Designated Person, which certifies that the general LEA responsibilities have been met or will be met as required by 40 C.F.R. § 763.93(i). | <u>WILL BE INCLUDED WITH EXEMPTION LETTER</u>                                 |
| 13 LEA must ensure the Designated Person has received adequate training to perform his/her duties as required by 40 C.F.R. § 763.84(g)(2).   | <u>NEEDS TO HAVE TWO HOUR AWARENESS TRAINING AT MINIMUM</u>                   |

#### 40 C.F.R. § 763.92 Training

- |  |   |
|--|---|
| 14 LEA must ensure that all members of its maintenance and custodial staff received the 2 hours of asbestos awareness training as required by 40 C.F.R. § 763.92(a)(1).  | <u>THIS HAS NOT BEEN DONE, AND NEEDS TO BE DONE ANNUALLY</u>                            |
| 15 LEA must ensure that all members of its maintenance and custodial staff who conduct activities that will result in the disturbance of ACM received the 14 hours of additional training as required by 40 C.F.R. § 763.92(a)(2). | <u>NO CONTACT WITH ASBESTOS MATERIALS IS ANTICIPATED</u>                                |
| 16 LEA must maintain records showing the name and title, date, location, and number of hours completed for persons trained as required by 40 C.F.R. § 763.92(a)(1,2) above.  | <u>NEEDS TO BE INCLUDED IN THE (MP) MANAGEMENT PLAN WITH ARCHITECT EXEMPTION LETTER</u> |



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. §§ 763.84 & 93 Notifications

##### Regulatory requirement

##### Observations

- 17 LEA must notify parents, teachers, and employee organizations in writing of the availability of the management plans. Notification must be done at least annually, as required by 40 C.F.R. § 763.93(g)(4) and 40

HAS NOT BEEN DONE TO THIS POINT.  
NEEDS TO BE DONE ANNUALLY AND  
A COPY INCLUDED IN THE MP

- 18 LEA must provide a description of steps taken, at least once a year, to inform workers and building occupants, or their legal guardians, about inspections, reinspections, response actions, and post-response action activities, including periodic reinspections and surveillance activities that are planned or in progress as required by 40 C.F.R. § 763.84(c) and § 763.93(e)(10).

NO CONTACT ANTICIPATED

- 19 LEA must provide short-term workers who may come into contact with asbestos in the school information regarding the locations of ACM and suspected ACM assumed to be ACM as required by 40 C.F.R. § 763.84(d).



#### 40 C.F.R. § 763.95 Labels

- 20 LEA must attach warning labels immediately adjacent to any friable and nonfriable ACM and assumed ACM, located in routine maintenance areas, as required by 40 C.F.R. § 763.95.

ARCHITECT EXEMPTION LETTER  
WILL BE OBTAINED



U.S. Environmental Protection Agency Region 8  
AHERA INSPECTION CHECKLIST

INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from observations recorded during walk-through of the school named below. Record only specific relevant observations or obtain copies. Do not attempt to make a compliance determination.

School Walk-Through

School name, address and year built: AMERICAN ACADEMY OF INNOVATION

5410 W. SOUTH JORDAN Pkwy, SOUTH JORDAN 84009

BUILT 2016

- 21 Each school under the LEA authority must maintain in its administrative office a complete, updated copy of the management plan for that school, as required by 40 C.F.R. § 763.93(g)(3)

WILL BE CREATED WHEN THE ARCHITECT EXEMPTION LETTER IS OBTAINED

- 22 Verify management plan information is accurate and thorough, check for proper completion of O&M activities and response actions, check for warning labels, interview staff to verify asbestos training

NONE TO DATE



## U.S. Environmental Protection Agency Region 8

### AHERA INSPECTION SUMMARY OF OBSERVATIONS

Name and address of inspector(s): <b>Jared James 195 North 1950 West Salt Lake City, UT 84114-4820</b>	Name & Address of LEA:
Date of Inspection:	
Name and Title of AHERA Designated Person:	Name of person to whom Summary & copy of AHERA regulation is given:

☐ LEA appears to be in compliance with AHERA ...OR...

*Deviations were observed in the areas checked below and a compliance determination will be made at Regional Headquarters during review of the inspection.*

#### Inspections and Reinspections

- ☐ 1. LEA must conduct an initial AHERA inspection (40 C.F.R. § 763.85(a)(1))
- ☐ 2. LEA must conduct a reinspection at least once every three years (40 C.F.R. § 763.85(b)(1))
- ☐ 3. LEA must conduct periodic surveillance at least once every six months (40 C.F.R. § 763.92(b))

#### Management Plans

- ☒ 4. LEA must develop & maintain an Asbestos Management Plan (40 C.F.R. § 763.93(a)(1))
- ☒ 5. LEA must maintain copies of all Management Plans at the administrative offices (40 C.F.R. § 763.93(g)(2))
- ☐ 6. LEA must update its Management Plan to keep it current (40 C.F.R. § 763.93(d))

#### Operations & Maintenance

- ☐ 7. LEA must implement an O & M plan (40 C.F.R. § 763.91(a))
- ☐ 8. LEA must maintain records of O & M activities (40 C.F.R. § 763.94(a & f))

#### Response Actions

- ☐ 9. LEA must select and implement appropriate response actions in a timely manner (40 C.F.R. § 763.90)
- ☐ 10. LEA must keep appropriate records of response actions (40 C.F.R. § 763.94(b))

#### AHERA Designated Person

- ☒ 11. LEA must designate a person to ensure the LEA responsibilities are met (40 C.F.R. § 763.84(g))
- ☒ 12. Each management plan must have a signed "true and correct" statement (40 C.F.R. § 763.93(i))
- ☒ 13. LEA must provide training for the AHERA Designated Person (40 C.F.R. § 763.84(g)(2) & 93(e)(4))

#### Training

- ☒ 14. All LEA maintenance & custodial staff must receive 2-hour asbestos awareness training (40 C.F.R. § 763.92(a)(1))
- ☐ 15. All LEA personnel who will disturb asbestos must receive additional 14 hours training (40 C.F.R. § 763.92(a)(2))
- ☐ 16. LEA must maintain appropriate training records in the management plan (40 C.F.R. § 763.94(c))

#### Notifications

- ☒ 17. LEA must notify parent, teacher & staff about Management Plan availability annually (40 C.F.R. § 763.93(g)(4))
- ☒ 18. LEA must inform workers & occupants about current and planned asbestos activities annually (40 C.F.R. § 763.94(c))
- ☐ 19. LEA must notify short-term workers about the locations of ACBM or suspected ACBM (40 C.F.R. § 763.84(d))

#### Warning Labels

- ☐ 20. LEA must attach warning labels immediately adjacent to any friable and nonfriable ACBM in routine maintenance areas (40 C.F.R. § 763.95)

#### School Walk-Through

- ☒ 21. LEA must maintain current copy of the Management Plan in each school office (40 C.F.R. § 763.93(g)(3))
- ☐ 22. Discrepancies noted during school walk-through or in interviews

Title of Inspector: <b>AHERA Compliance Inspector</b>	Name / Title of Recipient:
Signature of Inspector: _____ Date: _____	Signature of Recipient _____ Date: _____



## U.S. Environmental Protection Agency Region 8 AHERA INSPECTION REPORT

Name and address of inspector(s): <b>Jared James 195 North 1950 West Salt Lake City, UT 84114-4820</b>	Name & Address of LEA:
Date of Inspection:	
Name and Title of AHERA Designated Person:	Name of Individual to Whom Summary is Given:

**Preliminary Contact:**

**LEA Information**

**Sequence of Events**

**Opening Conference**

**Inspection Results**

**Item #1: Initial AHERA inspection (40 C.F.R. § 763.85(a)(1))**

**Item #2: Triennial reinspections (40 C.F.R. § 763.85(b)(1))**



## U.S. Environmental Protection Agency Region 8 AHERA INSPECTION CHECKLIST

Name & Address of Inspector(s) <b>Jared James</b> 195 North 1950 West Salt Lake City, UT 84114-4820		Name & Address of LEA: <b>AMERICAN ACADEMY OF INNOVATION</b> 5410 W. SOUTH JORDAN Pkwy SOUTH JORDAN, UT 84009	
phone: <b>385-306-6501</b> email: <b>jsjames@utah.gov</b>		phone: <b>801-810-4786</b> email:	
Insp. (ICIS) no. <b>JJ-0008</b>	Prev. Insp. Date	Name & Title of CEO	
Insp Date & Time <b>APRIL 29, 2025 9 AM</b>		Name & Title of AHERA DP	

### OPENING CONFERENCE

Credentials presented to:

Notice of Inspection presented to & signed by:

LEA personnel attending:

**ROBERT WARREN**

Other State/Local/Tribal Officials attending:

LEA data:

Type ☒ Public ☐ Private ☐ Other \_\_\_\_\_

No. of schools/buildings: \_\_\_\_\_ No. of Staff \_\_\_\_\_

No. of students: \_\_\_\_\_ % Native American: \_\_\_\_\_

Reason for Inspection: (explain)

Neutral scheme: ☒ Random ☐ Selected

For Cause: ☐ Tip / Complaint ☐ Referral

EPA Enforcement Initiative ☐

Sequence of inspection activities and expected outcomes explained:

\_\_\_\_\_  
\_\_\_\_\_



## U.S. Environmental Protection Agency Region 8 ASBESTOS INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. §763.85, 92. Inspection and reinspections

##### Regulatory requirement

##### Observations

- 1 LEA must inspect each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and nonfriable ACBM, as required by 40 C.F.R. § 763.85(a)(1).
- 2 LEA must conduct a reinspection of all friable and nonfriable known or assumed ACBM in each school building that they lease, own, or otherwise use as a school building, at least once every three years as required by 40 C.F.R. § 763.85(b)(1).
- 3 LEA must conduct a periodic surveillance in each building that it leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM at least once every six months, as required by 40 C.F.R. § 763.92(b)(1).

Original inspection: date, author, accreditation

THE SCHOOL WAS BUILT IN 2016. LEA  
WILL CONTACT ARCHITECT FOR THE  
EXEMPTION LETTER

Most recent reinspection: date, author, accreditation

Most recent periodic surveillance: date, performed by

#### 40 C.F.R. §763.93 Management Plans

- 4 LEA must develop an asbestos management plan for each school, including all buildings that they lease, own, or otherwise use as school buildings, and submit the plan to an Agency designated by the Governor of the State in which the LEA is located, as required by 40 C.F.R. § 763.93(a)(1).
- 5 LEA must maintain in its administrative office a complete, updated copy of a management plan for each school under its administrative control or direction as required by 40 C.F.R. § 763.93(g)(2).

Original management plan: date, author, accreditation

WILL MAKE WHEN EXEMPTION LETTER  
IS RECEIVED

#### 40 C.F.R. 763 §93 Management Plans - continued

##### Regulatory requirement

##### Observations

- 6 LEA must update its management plan to keep it current with ongoing operations and maintenance, periodic surveillance, inspection, reinspection, and response activities as required under 40 C.F.R. § 763.93(d).

Most recent MP update: date, author, certi



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

### 40 C.F.R. §763.91 Operations and Maintenance

- 7 LEA must develop and implement an operations and maintenance (O&M) plan whenever any friable ACBM is present or assumed to be present in a building that the LEA leases, owns, or otherwise uses as a school building, as required by 40 C.F.R. § 763.91(a).

WILL OBTAIN EXEMPTION LETTER

- 8 LEA must maintain records of O&M activities to include description of the activity, the name of each person involved, start & end dates, location(s), preventive measures used, and if ACM is removed, the name and location of storage or disposal site of the ACM, as required by 40 C.F.R. § 763.94(f).

### 40 C.F.R. §763.90 Response Actions

- 9 LEA must select and implement appropriate response actions in a timely manner. The selected response actions must be sufficient to protect human health or the environment, as required by 40 C.F.R. § 763.93(e) and § 763.90.

- 10 LEA must maintain records of response actions to include description of the actions taken, methods used, names of all persons involved, start & end dates, location(s), preventive measures used, and if ACM is removed, the name and location of storage or disposal site of the ACM, as required by 40 C.F.R. § 763.94(f).



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. § 763.84(g) Designated Person

- | Regulatory requirement   | Observations  |
|--|---|
| 11 LEA must designate a person to ensure that the requirements of the ASHERA regulations are properly implemented as required by 40 C.F.R. § 763.84(g)(1).   | Date of letter of designation:<br><u>A DESIGNATED PERSON WILL BE ASSIGNED</u> |
| 12 LEA must ensure that each management plan contains a "true and correct" statement, signed by the individual Designated Person, which certifies that the general LEA responsibilities have been met or will be met as required by 40 C.F.R. § 763.93(i). | <u>WILL BE INCLUDED WITH EXEMPTION LETTER</u>                                 |
| 13 LEA must ensure the Designated Person has received adequate training to perform his/her duties as required by 40 C.F.R. § 763.84(g)(2).   | <u>NEEDS TO HAVE TWO HOUR AWARENESS TRAINING AT MINIMUM</u>                   |

#### 40 C.F.R. § 763.92 Training

- |   |   |
|---|---|
| 14 LEA must ensure that all members of its maintenance and custodial staff received the 2 hours of asbestos awareness training as required by 40 C.F.R. § 763.92(a)(1).   | <u>THIS HAS NOT BEEN DONE, AND NEEDS TO BE DONE ANNUALLY</u>                            |
| 15 LEA must ensure that all members of its maintenance and custodial staff who conduct activities that will result in the disturbance of ACBM received the 14 hours of additional training as required by 40 C.F.R. § 763.92(a)(2). | <u>NO CONTACT WITH ASBESTOS MATERIALS IS ANTICIPATED</u>                                |
| 16 LEA must maintain records showing the name and title, date, location, and number of hours completed for persons trained as required by 40 C.F.R. § 763.92(a)(1,2) above.   | <u>NEEDS TO BE INCLUDED IN THE (MP) MANAGEMENT PLAN WITH ARCHITECT EXEMPTION LETTER</u> |



## U.S. Environmental Protection Agency Region 8 ASHERA INSPECTION CHECKLIST

### INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from review of the observations recorded during audit of the LEA's Asbestos Management Plan(s). Record only specific relevant observations or obtain copies.

#### 40 C.F.R. §§ 763.84 & 93 Notifications

##### Regulatory requirement

##### Observations

- 17 LEA must notify parents, teachers, and employee organizations in writing of the availability of the management plans. Notification must be done at least annually, as required by 40 C.F.R. § 763.93(g)(4) and 40

HAS NOT BEEN DONE TO THIS POINT.  
NEEDS TO BE DONE ANNUALLY AND  
A COPY INCLUDED IN THE MP

- 18 LEA must provide a description of steps taken, at least once a year, to inform workers and building occupants, or their legal guardians, about inspections, reinspections, response actions, and post-response action activities, including periodic reinspections and surveillance activities that are planned or in progress as required by 40 C.F.R. § 763.84(c) and § 763.93(e)(10).

NO CONTACT ANTICIPATED

- 19 LEA must provide short-term workers who may come into contact with asbestos in the school information regarding the locations of ACM and suspected ACM assumed to be ACM as required by 40 C.F.R. § 763.84(d).



#### 40 C.F.R. § 763.95 Labels

- 20 LEA must attach warning labels immediately adjacent to any friable and nonfriable ACM and assumed ACM, located in routine maintenance areas, as required by 40 C.F.R. § 763.95.

ARCHITECT EXEMPTION LETTER  
WILL BE OBTAINED



U.S. Environmental Protection Agency Region 8  
AHERA INSPECTION CHECKLIST

INSPECTION NOTES

LEA:

DATE:

Compliance with the following requirements will be determined from observations recorded during walk-through of the school named below. Record only specific relevant observations or obtain copies. Do not attempt to make a compliance determination.

School Walk-Through

School name, address and year built: AMERICAN ACADEMY OF INNOVATION

5410 W. SOUTH JORDAN Pkwy, SOUTH JORDAN 84009

BUILT 2016

- 21 Each school under the LEA authority must maintain in its administrative office a complete, updated copy of the management plan for that school, as required by 40 C.F.R. § 763.93(g)(3)

WILL BE CREATED WHEN THE ARCHITECT EXEMPTION LETTER IS OBTAINED

- 22 Verify management plan information is accurate and thorough, check for proper completion of O&M activities and response actions, check for warning labels, interview staff to verify asbestos training

NONE TO DATE



## U.S. Environmental Protection Agency Region 8 AHERA INSPECTION SUMMARY OF OBSERVATIONS

Name and address of inspector(s): <b>Jared James 195 North 1950 West Salt Lake City, UT 84114-4820</b>	Name & Address of LEA:
Date of Inspection:	
Name and Title of AHERA Designated Person:	Name of person to whom Summary & copy of AHERA regulation is given:

☐ LEA appears to be in compliance with AHERA ...OR...

*Deviations were observed in the areas checked below and a compliance determination will be made at Regional Headquarters during review of the inspection.*

### Inspections and Reinspections

- ☐ 1. LEA must conduct an initial AHERA inspection (40 C.F.R. § 763.85(a)(1))
- ☐ 2. LEA must conduct a reinspection at least once every three years (40 C.F.R. § 763.85(b)(1))
- ☐ 3. LEA must conduct periodic surveillance at least once every six months (40 C.F.R. § 763.92(b))

### Management Plans

- ☒ 4. LEA must develop & maintain an Asbestos Management Plan (40 C.F.R. § 763.93(a)(1))
- ☒ 5. LEA must maintain copies of all Management Plans at the administrative offices (40 C.F.R. § 763.93(g)(2))
- ☐ 6. LEA must update its Management Plan to keep it current (40 C.F.R. § 763.93(d))

### Operations & Maintenance

- ☐ 7. LEA must implement an O & M plan (40 C.F.R. § 763.91(a))
- ☐ 8. LEA must maintain records of O & M activities (40 C.F.R. § 763.94(a & f))

### Response Actions

- ☐ 9. LEA must select and implement appropriate response actions in a timely manner (40 C.F.R. § 763.90)
- ☐ 10. LEA must keep appropriate records of response actions (40 C.F.R. § 763.94(b))

### AHERA Designated Person

- ☒ 11. LEA must designate a person to ensure the LEA responsibilities are met (40 C.F.R. § 763.84(g))
- ☒ 12. Each management plan must have a signed "true and correct" statement (40 C.F.R. § 763.93(i))
- ☒ 13. LEA must provide training for the AHERA Designated Person (40 C.F.R. § 763.84(g)(2) & 93(e)(4))

### Training

- ☒ 14. All LEA maintenance & custodial staff must receive 2-hour asbestos awareness training (40 C.F.R. § 763.92(a)(1))
- ☐ 15. All LEA personnel who will disturb asbestos must receive additional 14 hours training (40 C.F.R. § 763.92(a)(2))
- ☐ 16. LEA must maintain appropriate training records in the management plan (40 C.F.R. § 763.94(c))

### Notifications

- ☒ 17. LEA must notify parent, teacher & staff about Management Plan availability annually (40 C.F.R. § 763.93(g)(4))
- ☒ 18. LEA must inform workers & occupants about current and planned asbestos activities annually (40 C.F.R. § 763.94(c))
- ☐ 19. LEA must notify short-term workers about the locations of ACBM or suspected ACBM (40 C.F.R. § 763.84(d))

### Warning Labels

- ☐ 20. LEA must attach warning labels immediately adjacent to any friable and nonfriable ACBM in routine maintenance areas (40 C.F.R. § 763.95)

### School Walk-Through

- ☒ 21. LEA must maintain current copy of the Management Plan in each school office (40 C.F.R. § 763.93(g)(3))
- ☐ 22. Discrepancies noted during school walk-through or in interviews

Title of Inspector: <b>AHERA Compliance Inspector</b>	Name / Title of Recipient:
Signature of Inspector: _____ Date: _____	Signature of Recipient _____ Date: _____



## U.S. Environmental Protection Agency Region 8 AHERA INSPECTION REPORT

Name and address of inspector(s): <b>Jared James</b> <b>195 North 1950 West</b> <b>Salt Lake City, UT 84114-4820</b>	Name & Address of LEA:
Date of Inspection:	
Name and Title of AHERA Designated Person:	Name of Individual to Whom Summary is Given:

**Preliminary Contact:**

**LEA Information**

**Sequence of Events**

**Opening Conference**

**Inspection Results**

**Item #1: Initial AHERA inspection (40 C.F.R. § 763.85(a)(1))**

**Item #2: Triennial reinspections (40 C.F.R. § 763.85(b)(1))**



State of Utah

SPENCER J. COX  
Governor

DEIDRE HENDERSON  
Lieutenant Governor

Department of  
Environmental Quality

Timothy Davis  
Executive Director

DIVISION OF AIR QUALITY  
Bryce C. Bird  
Director

May 8, 2025

DAQA-328-25

Robert Warren  
American Academy of Innovation  
5410 West South Jordan Parkway  
South Jordan, UT 84009

Dear Mr. Warren:

Re: Review of AHERA Management Plan for American Academy of Innovation

The documents submitted to the Utah Division of Air Quality (DAQ) as the Asbestos Hazard Emergency Response Act (AHERA) management plan has been reviewed. The following AHERA management plan has been accepted by the DAQ:

<u>AHERA Management Plan</u>	<u>Date Received</u>	<u>Date Accepted</u>
American Academy of Innovation	May 2, 2025	May 6, 2025

Please contact Jared James at (385) 306-6501 or at [jsjames@utah.gov](mailto:jsjames@utah.gov) if you have any questions regarding this letter.

Sincerely,

Jay Morris (May 7, 2025 12:40 MDT)

Bryce C. Bird  
Director

BCB:JSJ:lr

Enclosure: AHERA Management Plan Review Checklist

AHERA MANAGEMENT PLAN REVIEW CHECKLIST

UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR QUALITY  
195 North 1950 West, 4th Floor South  
PO Box 144820  
Salt Lake City, UT 84114-4820

Local Education Agency:

American Academy of Innovation  
5410 West South Jordan Parkway  
South Jordan, UT 84009

School or Facility:

American Academy of Innovation  
5410 West South Jordan Parkway  
South Jordan, UT 84009

Reviewer: Jared James

Date: May 6, 2025

Telephone Number: 385-306-6501

Please note that the correct and complete Asbestos Hazard Emergency Response Act (AHERA) management plans are ultimately the responsibility of the Local Education Agency (LEA). We hope that the Utah Division of Air Quality (DAQ) comments contained in this review will be helpful in meeting the AHERA requirements. U. S. Environmental Protection Agency (USEPA) correspondence emphasizes that states may want to note in their correspondence with an LEA, that even if an LEA's AHERA management plan is approved, USEPA may still determine after a subsequent on-site enforcement inspection that an LEA is violating the AHERA regulations.

REVIEW DETERMINATION

The AHERA management plan for the facility named above is:

  X   Accepted        Not Accepted

PLEASE TAKE NOTE OF THE FOLLOWING COMMENTS

CRITICAL ITEMS - RESPONSE TO THE UTAH DIVISION OF AIR QUALITY IS REQUIRED:

If your AHERA management plan has not been accepted, it is because material required to comply with the AHERA regulation is either missing or deficient. You are required to make the indicated corrections to the AHERA management plan currently on file at the individual school as well as the district office. In addition, you are required to send a copy of the corrected page(s) to the DAQ. The AHERA regulation requires that these corrections and revisions be sent to us within 30 days. An extension of up to 90 days may be granted upon written request.

“D” (deficient) indicates the letter needs to be revised. “A” (adequate) indicates the letter is acceptable to the DAQ and no further action is required by the local education agency.

I. A A signed statement by the principal architect or the lead project engineer responsible for the construction of a new school building built after October 12, 1988, that no asbestos containing building materials (ACBM) were specified as a building material in any construction document for the building, and to the best of his or her knowledge, no ACBM was used in the building. A Utah certified asbestos inspector working for a Utah certified asbestos company can also assess the presence of asbestos in the structure by performing an asbestos inspection that meets all regulatory requirements of AHERA. The asbestos inspector must write a letter stating that no regulated asbestos containing material was found during the asbestos inspection. A copy of the AHERA asbestos inspection report must be submitted with the letter from the certified asbestos inspector.

Comments: Please be advised that facilities constructed after October 12, 1988, are required to state the address and the year the facility was constructed. Also, **facilities that are not required to develop a full AHERA management plan are still required to have a designated person and to provide the annual notification to parents, teachers, and employee organizations.** Records of these notices are still required to be maintained with the letter from the architect, project engineer, or Utah certified asbestos inspector which serves as an AHERA management plan.

1 May 2025

Robert Warren  
American Academy of Innovation  
5410 South Jordan Parkway  
South Jordan, UT 84009

Re: American Academy of Innovation Asbestos Management Plan

Dear Mr. Warren,

Babcock Design served as the architect for the American Academy of Innovation, a project designed and constructed between 2015 and 2016. A classroom addition was subsequently completed in 2020. During these periods, I held the position of architectural project manager for the undertaking.

As you know, the Environmental Protection Agency (EPA) initiated regulations concerning the use of asbestos in construction materials beginning in the 1970s. Consequently, its application has significantly diminished over the years due to increasing public awareness of the associated health risks.

At the time of the American Academy of Innovation's construction, the majority of building material manufacturers had ceased incorporating asbestos into their products. To the best of our knowledge and based on the information available to us at that time, no asbestos-containing materials were specified or utilized in the construction of the school building.

Sincerely,

  
Wesley Baker  
Principal



**BABCOCK DESIGN**

SALT LAKE CITY 52 EXCHANGE PLACE SALT LAKE CITY, UT 84111 801.531.1144 | BOISE 800 WEST MAIN STREET SUITE 940 BOISE, ID 83702 208.424.7675 | [BABCOCKDESIGN.COM](http://BABCOCKDESIGN.COM)