District Sustainability Award Nominee Presentation Form

CERTIFICATIONS

District’s Certifications
The signatures of the district superintendent on the next page certify that each of the statements below concerning the district’s eligibility and compliance with the following requirements is true and correct to the best of the superintendent’s knowledge.

1. The district has been evaluated and selected from among districts within the Nominating Authority’s jurisdiction, based on high achievement in the three ED-GRS Pillars: 1) reduced environmental impact and costs; 2) improved health and wellness; and 3) effective environmental and sustainability education.

2. The district is providing the U.S. Department of Education Office of Civil Rights (OCR) access to information necessary to investigate a civil rights complaint or to conduct a district wide compliance review.

3. OCR has not issued a violation letter of findings to the school district concluding that the nominated school district has violated one or more of the civil rights statutes. A violation letter of findings will not be considered outstanding if OCR has accepted a corrective action plan to remedy the violation.

4. The U.S. Department of Justice does not have a pending suit alleging that the school district has violated one or more of the civil rights statutes or the Constitution’s equal protection clause.

5. There are no findings of violations of the Individuals with Disabilities Education Act in a U.S. Department of Education monitoring report that apply to the school district in question; or if there are such findings, the state or school district has corrected, or agreed to correct, the findings.

6. The district meets all applicable federal, state, local and tribal health, environmental and safety requirements in law, regulations and policy and is willing to undergo EPA on-site verification.

U.S. Department of Education Green Ribbon Schools District Sustainability Award 2019-2021

Name of Superintendent: Mr. Mikal Shalikow
(Specify: Ms., Miss, Mrs., Dr., Mr., etc.) (As it should appear in the official records)

District Name: Newman Grove Public School
(As it should appear on an award)

I have reviewed the information in this application and certify that to the best of my knowledge all information is accurate.

(Superintendent’s Signature) Date: February 9th, 2021

Nominating Authority’s Certifications
The signature by the Nominating Authority on this page certifies that each of the statements below concerning the district’s eligibility and compliance with the following requirements is true and correct to the best of the Authority’s knowledge.

1. The district is one of those overseen by the Nominating Authority which is highest achieving in the three ED-GRS Pillars: 1) reduced environmental impact and costs; 2) improved health and wellness; and 3) effective environmental education.

2. The district meets all applicable federal civil rights and federal, state, local and tribal health, environmental and safety requirements in law, regulations and policy and is willing to undergo EPA on-site verification.

Name of Nominating Agency: Nebraska Department of Education

Name of Nominating Authority: Ms. Audrey Webb
(Specify: Ms., Miss, Mrs., Dr., Mr., Other)

I have reviewed the information in this application and certify to the best of my knowledge that the school meets the provisions above.

Audrey Webb

Date: 03/01/21

(Nominating Authority’s Signature)

**SUBMISSION**

The nomination package, including the signed certifications, narrative summary, documentation of evaluation in the three Pillars, and photos should be submitted online according to the instructions in the Nominee Submission Procedure.

OMB Control Number: 1860-0509
Expiration Date: December 31, 2023

**Public Burden Statement**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1860-0509. Public reporting burden for this collection of information is estimated to average 37 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit P.L. 107-110, Sec. 501, Innovative Programs and Parental Choice Provisions. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20202-4536 or email ICDocketMgr@ed.gov and reference the OMB Control Number 1860-0509. Note: Please do not return the completed ED-Green Ribbon Schools application to this address.
Newman Grove Public Schools

Summary Narrative

Newman Grove Public Schools (NGPS) is a small, rural school serving 186 students, elementary through high school, 49% of which are socioeconomic disadvantaged. It has worked toward the three pillars of ED-GRS by coming together and being what many small schools are, a close-knit community. NGPS has built strong relationships over the years with agencies including Lower Platte North Natural Resources District, Nebraska Game and Parks and the Nebraska Department of Environment and Energy (NDEE).

To reduce environmental impact and costs, NGPS built a new school featuring efficient HVAC; LED and motion-sensored lighting; efficient doors and windows; and automatic faucets and toilets. This has meant that, instead of heating and cooling three separate buildings, the district has reduced to two buildings. During the weekends, devices are unplugged and turned off. Through this project NGPS moved the elementary school onto the same side of the street as the junior/senior high school. This eliminates the elementary students and staff crossing the highway several times throughout the school day.

The school FFA program oversees paper and aluminum recycling. The agriculture mechanics class at Newman Grove partners with a local manufacturing company to collect their metal scrap to use in our welding course throughout the year. The small pieces of steel and aluminum that are discarded by the manufacturing business are used by students to practice welding methods. Once the metal is completely full of welds, the scrap metal is taken to a nearby metal recycling center. FBLA and FFA groups participate in a trash pickup on a local highway.

NGPS partners with a local pest control company to keep buildings safe and clean. Custodial staff uses EnvirOx cleaning solutions to disinfect throughout the buildings.

The FFA students maintain a greenhouse where they grow lettuce for the school cafeteria. They are in the process of setting up a larger herb and produce garden. NGPS participates in “Nebraska Beef in our Schools,” where local families donate beef to the school lunch program. “Nebraska Thursdays” is another program where they incorporate Nebraska-sourced foods into the meals. The “Backpack Blessing” program provides students who take part in the free and reduced lunch program with weekly snacks to take home.

K-6 students receive an hour of exercise time each day in the form of PE and recess. All students take part in the FitnessGram testing each year. A full-time counselor offers an hour a week of guidance and attends to the overall mental health of students. A licensed mental health practitioner from the community also serves NGPS students one day each week. A Positive Behavioral Interventions and Supports (PBIS) team focuses on developing character education among the student body. Teachers and students are encouraged to compliment individuals or classes who model “The Bluejay Way.” Each month, one student who goes above and beyond those guidelines is recognized as the top Bluejay and gets to pick the lunch menu for one school day.

Staff members are encouraged to enroll and participate in Educators Health Alliance (EHA) programs that focus on exercise, nutrition, hydration, sleep, mindfulness, and other various
topics. EHA covers the cost for our staff members to be part of the Headspace program, focusing on mindfulness, and Weight Watchers. The school nurse provides first aid and CPR training to all staff members. The school organizes the administration of annual flu shots.

NGPS provides project based and citizen science educational opportunities for students. The Shell Creek runs through the town of Newman Grove. In recent years, farmers and local conservation groups had noticed an increase in flooding, pollution and eroding in the stream. To better understand and potentially reverse these harmful changes students from Newman Grove Schools have, over nearly 20 years, volunteered their summers to monitor the water quality. The combination of hands-on learning and good old-fashioned playing in the creek has kept students engaged. Monitoring the creek allows conservationists and local farmers to take appropriate measures that help protect the stream.

The project studies the effects of agricultural chemicals on the environment in the local area. They test six sites covering more than 30 miles of the watershed. New technologies have been added to the project such as drones and GIS. The student scientists also compare the Shell Creek Watershed data to a nearby creek, the Beaver Creek. Approximately one-fourth to one-third of the junior high and high school student population participates in this program annually, providing year-round learning opportunities. A major focus of this program is to follow things such as coliform bacteria, where it comes from in the system, and where it goes. They report the results of the project to multiple agencies including the Lower Platte North Natural Resources District and the NDEE. The Shell Creek project has inspired multiple students to follow career paths in natural resources and science education.

In Independent Science Research, students conduct their own experiments, collecting data, analyzing data, and coming up with scientific conclusions. Both the science teachers and the agricultural education staff facilitate and help students with their research. Many research projects have included the agricultural department and many have also been in conjunction with the Shell Creek project. Through the Shell Creek Watershed Research Project students have received several local, state, regional and national awards and commendations for their conservation efforts.

Several of the science classes participate in the Trout in the Classroom project in cooperation with the Nebraska Game and Parks, raising trout eggs to fingerlings, monitoring tank water quality, engaging in stream habitat studies, and learning about ecosystems. Fifth grade learns about and designs a project to transport clean water to an area struck by disaster. The High Ability Learners program incorporates the Lego Education Renewable Energy challenge.

**Pillar I: Reduce Environmental Impact and Costs**

**Element 1A: Energy Savings**

Newman Grove Public School has recently undergone, and are in the final stages of, finishing their school renovation project. We have closed the doors on our 100 year old elementary building moving students across the highway to our new elementary school. The elementary building was built and attached to the current Jr/Sr high building. In doing so this
created opportunities for our district to help reduce our Greenhouse Gas (GHG) emissions. The district has shut down the old boiler system and updated it with a new HVAC system. Instead of heating and cooling 3 separate buildings, the district has reduced down to 2 buildings. Old fluorescent lights have been replaced by high efficiency LED lights. In addition, the new building has motion sensors which add to the energy efficiency to ensure lights are turned off at night. The old and outdated doors and windows on the century old elementary school have been completely replaced with premium insulated doors and new windows in our new building. This should have a substantial increase in saving on heating and cooling costs moving forward.

The school has, in addition to the items listed above, promoted classroom teachers to close doors and turn out lights whenever out of the classroom. During the weekends, devices are unplugged and turned off. This includes computer labs and all electronic devices throughout classrooms. The school's HVAC system allows regulatory settings that allow custodial staff and administrators to regulate temperatures throughout the building. This is extremely important during times over breaks such as Christmas and summer break, when only certain areas of the school are in use. This will greatly reduce the amount of energy needed to heat/cool the building by reducing the square footage.

Element 1B: Improved Water Quality, Efficiency and Conservation

The Shell Creek runs through the town of Newman Grove, NE. In recent years, farmers and local conservation groups had noticed an increase in flooding, pollution and eroding in the stream. To better understand and potentially reverse these harmful changes students from Newman Grove Schools have volunteered their summers to monitor the water quality. In 2002 the Shell Creek Watershed Monitoring Project was created. The combination of hands-on learning and good old-fashioned playing in the creek kept the students engaged and wanting more. The teachers realized that the project was the perfect way to expose teens to important issues in their community in a way that taught valuable lessons in science and environmental stewardship. The Shell Creek Watershed Project has evolved into a summertime volunteer program during which high school students spend two days a month, May through August, testing the water for various factors that can contribute to erosion and water quality degradation. They test six sites covering more than 30 miles of the watershed. Monitoring the creek annually allows water conservationists and local farmers to take appropriate measures that help protect the stream. For example our local Natural Resource Conservation Service has reported that over the last several years the use of farming practices such as no-till, minimum-till, buffer strips, and cover crops have increased substantially in our area. Recently new technologies have been added to the project such as drones and GIS. The student scientists also compare the Shell Creek Watershed data to a nearby creek, the Beaver Creek. They learned that due to different environmental and geological situations, the Shell Creek water quality issues were unique to our particular watershed. For the past 19 years the students have compiled all of their data and related information into an extensive website and video:
This past summer this group has partnered with the Nebraska Department of Environment and Energy (NDEE) to monitor bacteria levels in Shell Creek. The NDEE has provided equipment and materials to the school in exchange for the data that they collect. This partnership has been very beneficial for both groups as an educational experience and as an environmental monitoring program.

To fulfill their responsibilities as citizen scientists, the students put all the data they have collected into a presentation each year for the Lower Platte North Natural Resources District, the Shell Creek Watershed Improvement Group and other community stakeholders. These efforts have helped to recently get the Shell Creek delisted from the national impaired waters list for atrazine. This is the first time in the United States that a stream has been delisted for atrazine. The students and community now see that what we do does make a difference.

This year the students have added the monitoring of local wells for nitrates to the data collection. In recent years there have been local health concerns related to increasing nitrate levels in drinking water in our area. By providing this service to our local patrons we hope to help provide the data to address these public health concerns.

This project has received many local, state, regional and national awards and recognitions. The students were named Master Conservationists of the Year by the Omaha World Herald in 2005 and 2018. They received the Regional R C & D Youth Involvement Award in 2006 and the 2003 Volunteers of the Year from the Lower Platte North NRD. Commendations received include letters from two United States Senators and a commendation from the United States Environmental Protection Agency for Outstanding achievement in environmental protection services in 2019. They have also had many newspaper and magazine articles written about their project and recently had an article published, “Shell Creek: A Laboratory for Learning and Change” in the March 2019 issue of the Water Resources Impact Magazine by the American Water Resources Association.

Element 1C: Reduced Waste Production

Our school district has provided each classroom throughout our building with paper recycling containers. Students, teachers, and staff are encouraged to dispose of all paper and cardboard items into the recycling containers. The paper recycling opportunity is made available by a local sanitation company in our community. The city and school are partnered for the cardboard and paper recycling program.

Throughout our building, staff and students have made a joint effort to reduce their use of paper. The school district has two efficient copy machines for staff to use in the office, limiting the amount of copies that can be made and accidental printing from computers. Teachers have also substantially reduced their paper use in their classrooms by using Google Classroom to post documents online that used to be printed for students. Over the last seven years we have reduced paper consumption by 40 to 50 percent.
In addition to the school wide recycling effort, our FFA chapter has an aluminum can recycling bin where community members can drop off their cans. The student members of the FFA chapter clean out and collect cans from the bin two times each year. The cans are then delivered to a nearby can recycling center.

The agriculture mechanics class at Newman Grove partners with a local manufacturing company to collect their metal scrap to use in our welding course throughout the year. The small pieces of steel and aluminum that are discarded by the manufacturing business are used by students to practice welding methods. Once the metal is completely full of welds, the scrap metal is taken to a nearby metal recycling center. This allows the metal to be used an additional time before being recycled. Our class also wastes less using scraps compared to purchasing new sheets of metal.

In addition to recycling in our building, our custodial staff currently uses EnvirOx cleaning solutions to disinfect throughout our buildings. Not only is EnvirOx considered a green cleaning material, it is also safer for our students and staff to be around.

Element 1D: Use of Alternative Transportation

Newman Grove Public Schools puts the safety of our students and staff as a high priority. The district offers transportation for students to and from school. We combine those students into as few routes as our vehicles allow. The district has updated their vehicles over the past several years which provides us with more eco friendly vehicles and less emissions to the environment.

Newman Grove Public Schools has also updated the pickup and drop off area for students with the completion of the new construction project. There are new sidewalks and crosswalks for students who are walking or riding bikes to use. In addition we now have a drop off/pickup lane for parents to use. This allows for vehicles to come through and pick up their child safely and quickly. Through this project it moved the elementary school onto the same side of the street as the jr./sr. highschool. This eliminates the elementary students and staff crossing the highway several times throughout the school day.

We encourage students to walk and ride bicycles to school. To help ensure the safety of our students Newman Grove Public Schools provides crossing guards before and after school. The district also works closely with local law enforcement and they help make a presence during those times as well. The City of Newman Grove has undergone a large project to redo many sidewalks and streets in town over the past few years, making it much safer for those students who walk to and from school. Being a rural school we have many students that live in the country and either ride the busses/vans or ride with parents, however, we have approximately 40% of our students that walk or ride a bike to school regularly when weather permits.

Pillar II: Improve the Health and Wellness of Students and Staff

Element 2A: Integrated School Environmental Health Program
Newman Grove Public School has contracted with a local pest control company to come in and check for and eliminate pests such as insects and mice. With the addition of our new elementary school there has been an increase in these pests because of open areas during construction. The combination of the custodial staff and the pest control company has kept the pests at a minimum in the school. Custodial and maintenance staff regularly fog the building to help stop the spread of the Coronavirus and other viruses including influenza. They are also diligent about changing the air filters in the air conditioning and heating systems.

Chemicals at NGPS are kept in secure facilities by the custodial staff and the science department. There are fireproof containers to hold volatile cleaning supplies and an acids cabinet in the science storage room.

Element 2B: Health and Wellness

Newman Grove Public Schools have several items in place to maintain and improve student and staff nutrition. Our FFA students have a greenhouse where they grow lettuce for salads used in lunches. They are in the process of setting up a larger herb and produce garden in the greenhouse to help supply the cafeteria with more fresh produce that improves the meals served at school. Along with growing our own produce, there are a few extra programs we are part of that connect the community and school families to our school health and wellness initiatives. We participate in “Nebraska Beef in our Schools,” where local families donate beef to the school lunch program. “Nebraska Thursdays” is another program where they incorporate Nebraska-sourced foods into the meals. Fifty percent of our student population receive free and reduced lunches. During the school closure due to the Covid-19 pandemic, the school was able to provide for many families who expressed a need for food during that time. We also participate in a “Backpack Blessing” program that provides students who take part in the free and reduced lunch program with weekly snacks to take home. All of these programs enhance student and staff health and ensure that we are providing meals and snacks needed to help support a variety of nutritional needs.

Staff members are encouraged to enroll and participate in Educators Health Alliance (EHA) programs that focus on exercise, nutrition, hydration, sleep, mindfulness, and other various topics. EHA covers the cost for our staff members to be part of the Headspace program, focusing on mindfulness, and Weight Watchers. We do not have an exercise facility in town to use, however, the new school weight room and gym are available to all staff to use at their convenience. The school nurse provides first aid and CPR training to all staff members. The school also organizes someone to administer flu shots. We have one school psychologist who provides trainings, such as, yearly suicide training for school staff members, different inservice topics, and she meets with students who need extra support. They also provide helpful tips to increase mental awareness and staff activities to increase overall wellness and build morale along with having the school counselor available to the staff.
The importance of cultivating an environment of health and wellness for our students also remains a priority. Students in grades K-6 receive 30 minutes of physical education every day. Grade 7-9 students have an hour of physical education/health education each day and grades 10-12 sign up for the fitness courses they want. About 5% of their physical education is spent outside. Grades K-6 also have 30 minutes of outdoor recess everyday. Our physical/health education time allotments are well above the state requirements. Our 7-12 students are able to participate in a variety of sports throughout the year, and all students take part in the FitnessGram testing each year. In regards to wellbeing, the school has a full-time counselor who sees students in K-6 60 minutes a week.

Lastly, we also have a Positive Behavioral Interventions and Supports (PBIS) team that focuses on developing character education among our student body. The guidance department works with our PBIS team to help increase wellbeing awareness and reinforce character skills with students. They have created a program called, “The Bluejay Way” that focuses on students being respectful, responsible, and safe citizens. Each classroom started the year by creating posters for their classrooms that gave examples of ways to be safe, responsible, and respectful. Teachers and students are encouraged to compliment individuals or classes who model “The Bluejay Way.” Each month one student who goes above and beyond those guidelines is recognized as the top Bluejay and gets to pick the lunch menu for one school day. This has been a great addition that builds awareness of wellbeing and community among our student body!

Pillar III: Provide Effective Environmental and Sustainability Education, Incorporating STEM, Civic Skills, and Green Career Pathways

Element 3A: Interdisciplinary Learning about the Key Relationships between Dynamic Environmental, Energy and Human Systems

The Newman Grove Public Schools have adopted and implemented the new NGSS science standards. With the implementation of these new standards K-8 has purchased and incorporated the Amplify Science curriculum. Included in this curriculum is environmental and sustainable education. On Arbor Day the elementary students participate in activities centered around conservation and in correlation with the Newman Grove tree board they plant their own tree. The elementary teachers are teaching environmental and sustainable education between and among various disciplines when they teach their social science education. They include conservation and natural resources, renewable and nonrenewable resources, mining practices, and human impact on the environment.

For the upper levels 9-12, there has been a collaboration between our science department and the Agriculture department to insure effective environmental and sustainable education. For the past 19 years the students have participated in and been in charge of the Shell Creek project. Classes included at Newman Grove Jr/Sr high school related to environmental and sustainable
education include Natural Resources, Shell Creek Monitoring Project, General Biology and Advanced Biology. Included in the high school classroom curriculum are various lessons from Nebraska Game and Parks Project Wild and the Field Manual for Water Quality Monitoring by Mark Mitchell and William Stapp. Newman Grove Public Schools has partnered with Nebraska Game and Parks to incorporate Trout in the Classroom. The objectives for this program include raising trout eggs to fingerlings, monitoring tank water quality, engaging in stream habitat studies, and helping students in understanding ecosystem connectivity. Our FFA and FBLA groups have also joined in with conservation efforts. FBLA goes south of Newman Grove on Highway 45 and picks up trash along the road and disposes of it appropriately. Our FFA chapter collects aluminium cans and takes them to the local recycling center.

Element 3B: Use of the Environment and Sustainability to Develop STEM Content Knowledge and Thinking Skills

The Newman Grove Public School administration, staff, and students implement STEM activities and critical thinking skills throughout the school year. Throughout the year, discussions are held within classrooms about the effects we have on the environments and how we can sustain our planet and improve our community with the ideas we discover within the classrooms. The students demonstrate the knowledge, intellectual skills, attitudes, experiences and motivation to make and act upon responsible environmental decisions as individuals and as members of their community.

The High Ability Learners program, which consists of grades 4-12, discover within the lego mindstorm challenges of how to be environmentally safe and sustainable activities that not only would work in our school, but within our community. This year the HAL students have incorporated the Lego Education Renewable Energy challenge and incorporate their findings into our community. The Shell Creek Watershed Project works with the Lower Platte North Natural Resources District, the Shell Creek Watershed Improvement Group and other community stakeholders to monitor the water quality and improve our environment. The students at NGPS work together to develop better energy conservation ways they believe would be beneficial to our school and our community. Our middle school students developed ways within their classrooms to improve the water quality and brainstorm a variety of ways to make our water better. The primary grades have created projects about the importance of reduce, recycle, and reuse. They create handmade projects on different levels with materials from everyday household items. These activities completed by our student body require them to work collectively to develop systems that are esthetically pleasing and would require a deeper level of learning on all levels.

Element 3C: Civic Skills and Green Career Pathways
Newman Grove Public School provides various activities that allow students to explore career pathways through the use of their science curriculum. Grades fourth through eighth are given a civic problem that they have to solve. One example is shown with the 5th grade class when they have to discover a way to deliver clean drinking water to a small village in Africa. Students design different concepts and explain which concept of theirs is the most efficient and cost effective. These types of simulated problem solving projects occurring throughout upper elementary grades culminate with the real life environmental problem solving of the Shell Creek Research Project in Junior High and High School.

The high school students involved in the Shell Creek Research Project fulfill the civic responsibility component of the program by preparing a presentation for the Lower Platte North Natural Resource District Board Directors and staff each fall. During this presentation they detail their findings from the past summer, discuss trends they are seeing from the last 19 years of data collection and answer questions from NRD board members and local patrons of the area.

The district also has expanded career opportunities through the use of our Shell Creek Water Project. An example would be of a former student who went on to become a science teacher, they stated, “The Shell Creek Watershed was the spark that started the flame for my desire in discovering how the world works...I wanted to go deeper into science.” This opportunity has opened the door for many former students and continues to do so. Another former student who is now a fisheries technician at the North Platte State Fish Hatchery, stated “While working on the Shell Creek Watershed Project as a teenager, my passion for conservation really developed. I am grateful that this opportunity was available to me and it is unlikely I would be working in the position I am today had it not been. The level of improvement seen in Shell Creek serves as a great case study on what a small group of concerned citizens can do to reverse damage caused by human influence”.

**Federal Eligibility and Compliance Requirements**

Note that if selected for nomination to ED-GRS, the school principal and district superintendent must be prepared to certify that each of the statements below concerning the school’s eligibility and compliance with the following requirements is true; however, in no case is a private school required to make any certification with regard to the public school district in which it is located.

1. The school has some configuration that includes one or more grades Pre-K-12.
2. The school has been evaluated and selected from among schools within the Nominating Authority’s jurisdiction as highest achieving in the three ED-GRS Pillars: 1) reduced environmental impact costs; 2) improved health and wellness; and 3) effective environmental and sustainability education.
3. Neither the nominated public school nor its public school district is refusing the U.S. Department of Education Office or Civil Rights (OCR) access to information necessary to investigate a civil rights complaint or to conduct a district wide compliance review.
4. OCR has not issued a violation letter of findings to the public school or the public school district concluding that the nominated public school or the public school district as a whole has violated one or more of the civil rights statutes. A violation letter of findings will not be considered outstanding if OCR has accepted a corrective action plan to remedy the violation.

5. The U.S. Department of Justice does not have a pending suit alleging that the public school or the public school district as a whole has violated one or more of the civil rights statutes or the Constitution’s equal protection clause.

6. There are no findings of violations of the Individuals with Disabilities Education Act in a U.S. Department of Education monitoring report that apply to the public school or public school district in question; or if there are such findings, the state or public school district has corrected, or agreed to correct, the findings.

7. The school meets all applicable federal, state, local, and tribal health, environmental and safety requirements in law, regulations and policy and is willing to undergo EPA on-site verification.