



VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193
(703)583-3800 FAX (703) 583-3821
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

Thomas A. Faha
Regional Director

**VIRGINIA WASTE MANAGEMENT BOARD
ENFORCEMENT ACTION - ORDER BY CONSENT
ISSUED TO
FAIRFAX COUNTY SCHOOL BOARD
FOR
“WOODSON” GROUNDS DEPARTMENT
EPA ID No. VAD988193520
AND
FORTE CENTER
EPA ID No. VAD981111099**

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 10.1-1455, between the Virginia Waste Management Board and Fairfax County School Board, regarding the “Woodson” Grounds Department and Forte Center facilities, for the purpose of resolving certain violations of the Virginia Waste Management Act and the applicable regulations.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. “Board” means the Virginia Waste Management Board, a permanent citizens’ board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and -1401.
2. “CAA” means Central Accumulation Area.
3. “CFR” means the Code of Federal Regulations, as incorporated into the Regulations.

4. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia, as described in Va. Code § 10.1-1183.
5. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
6. "Facilities" or "Sites," means both the Fairfax County School Board's "Woodson" Grounds Department facility located at 9515 Main St, Building 5, Fairfax, VA 22030, and the Forte Center facility located at 6800-B Industrial Rd, Springfield, VA 22151.
7. "FCPS" means the Fairfax County School Board, a body corporate charged with the supervision of the public school system within Fairfax County. Fairfax County School Board is a "person" within the meaning of Va. Code § 10.1-1400.
8. "Forte Center" means the Fairfax County School Board's Forte Center facility located at 6800-B Industrial Rd, Springfield, VA 22151.
9. "Generator" means person who is a hazardous waste generator, as defined by 40 CFR § 260.10.
10. "Grounds Department" means the Fairfax County School Board's "Woodson" Grounds Department facility located at 9515 Main St, Building 5, Fairfax, VA 22030.
11. "Hazardous Waste" means any solid waste meeting the definition and criteria provided in 40 CFR § 261.3.
12. "LQG" means large quantity generator, a hazardous waste generator that generates 1000 kilograms (2200 pounds) or greater of hazardous waste in a calendar month and meets other restrictions. *See* 40 CFR § 262.34(a)-(b) and (g)-(l).
13. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 10.1-1455.
14. "NRO" means the Northern Regional Office of DEQ, located in Woodbridge, Virginia.
15. "Order" means this document, also known as a "Consent Order" or "Order by Consent."
16. "Regulations" or "VHWMR" means the Virginia Hazardous Waste Management Regulations, 9 VAC 20-60-12 *et seq.* Sections 20-60-14, -124, -260 through -266, -268, -270, -273, and -279 of the VHWMR incorporate by reference corresponding parts and sections of the federal Code of Federal Regulations (CFR), with the effective date as stated in 9 VAC 20-60-18, and with independent requirements, changes, and exceptions as noted. In this Order, when reference is made to a part or section of the CFR, unless otherwise specified, it means that part or section of the CFR as incorporated by the corresponding section of the VHWMR. Citations to independent Virginia requirements are made directly to the VHWMR.

17. "Solid Waste" means any discarded material meeting the definition provided in 40 CFR § 261.2.
18. "SQG" means a small quantity generator, a hazardous waste generator that generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and meets other restrictions. *See* 40 CFR § 262.34(d)-(f).
19. "Va. Code" means the Code of Virginia (1950), as amended.
20. "VAC" means the Virginia Administrative Code.
21. "Virginia Waste Management Act" means Chapter 14 (§ 10.1-1400 *et seq.*) of Title 10.1 of the Va. Code. Article 4 (Va. Code §§ 10.1-1426 through 10.1-1429) of the Virginia Waste Management Act addresses Hazardous Waste Management.
22. "VSQG" means a very small quantity generator of hazardous waste, a generator of less than 100 kilograms of hazardous waste in a month and meeting the other restrictions of 40 CFR § 261.5 and 9 VAC 20-81-10.

SECTION C: Findings of Fact and Conclusions of Law

"WOODSON" GROUNDS DEPARTMENT

1. FCPS owns and operates the Grounds Department in Fairfax, Virginia. The Grounds Department serves as storage and maintenance garage for Fairfax County Public Schools. Operations at the Grounds Department are subject to the Virginia Waste Management Act and the Regulations.
2. FCPS submitted a RCRA Subtitle C Site Identification Form (received March 6, 1991) that gave notice of regulated waste activity at the Grounds Department as a SQG of hazardous waste. FCPS was issued EPA ID No. VAD988193520 for the Facility.
3. Following a notification from Fairfax County Public Schools Office of Safety & Security, DEQ hazardous waste compliance staff conducted an announced inspection at the Grounds Department on June 19, 2019, to determine compliance with the Virginia Waste Management Act and Regulations. The Grounds Department had not been previously inspected by DEQ for this purpose.

The following paragraphs describe the observations of this inspection:

- a. At the Grounds Department, FCPS accumulates maintenance and laboratory wastes collected and consolidated from schools and support facilities within the FCPS school system. FCPS handles, stores, and disposes of these wastes as hazardous wastes. Laboratory and maintenance wastes are collected in small

bottles, boxes, or other packaging for disposal approximately every six months, through an off-site contractor, who makes specific determinations of wastes prior to disposal.

- b. No manifests for generation, accumulation, or removal of hazardous wastes were available to determine generation rates, however observations indicate that the facility was an LQG at the time of inspection, generating greater than 1,000 kg of non-acute or 1 kg of acute hazardous waste per month. FCPS did not make proper notification to DEQ of its generator status for the Grounds Department.
 - i. 40 CFR §262.17(f) requires that LQG's that accumulate hazardous wastes received from VSQG's (under the control of the same owner) must notify EPA of this fact within 30 days of receipt of the first shipment, and must maintain records of shipments for three years, in addition to complying with other independent requirements of LQG's regarding labeling and storage.
- c. No waste determinations were made at the point of generation (i.e., the VSQG facilities where wastes originated) prior to transport to the Grounds Department.
 - i. 40 CFR §262.11 requires that hazardous waste determinations for each solid waste must be made at the point of waste generation.
- d. Independent requirements of LQG's were not met.
 - i. 40 CFR §262.10(a)(1)(iii) requires that LQG's meet the requirements of:
 1. 40 CFR §262.13, Generator Category Determination
 2. 40 CFR §262.18, EPA Identification Numbers and Re-Notification for SQGs and LQGs
 3. 40 CFR §262 Subpart B, Manifest Requirements Applicable to SQGs and LQGs
 4. 40 CFR §262 Subpart C, Pre-Transport Requirements Applicable to SQGs and LQGs
 5. 40 CFR §262 Subpart D, Recordkeeping and Reporting
 6. 40 CFR §262 Subpart H, Transboundary Movements of Hazardous Waste for Recovery and Disposal
- e. Wastes from the schools and support facilities were received in a variety of containers and conditions. The facility is not meeting many of the conditions for exemption requirements of a LQG for wastes accumulated in the CAA.
 - i. 40 CFR §262.17(a)(1) requires a permit/notification-exempted LQG accumulate hazardous wastes on site for no more than 90 days in compatible containers of good condition, appropriately stored, and inspected weekly.

- f. Hazardous waste containers located in the CAA were not properly labeled or dated.
 - i. 40 CFR §262.17(5)(i) requires that LQGs label containers with the words, “hazardous waste,” the applicable hazardous characteristics of the contents, and the date when accumulation began in that container.
- g. No person in charge of hazardous waste management was trained in hazardous waste procedures.
 - i. 40 CFR §262.17(a)(7)(i)(B) requires that a hazardous waste program be directed by a person trained in hazardous waste management procedures.
- h. No written or electronic hazardous waste training plan was available.
 - i. 40 CFR §262.17(a)(7)(iv) requires that an LQG must maintain the following at the facility: the job title and name for each position related to hazardous waste management, a job description, and a description of training for each job position.
- i. No biennial report was generated for 2017 wastes.
 - i. 40 CFR §262.41(a) requires that LQGs submit EPA form 8700-13 A/B to the regional administrator by March 1 of even-numbered years for the generator shipment activities of the previous odd-numbered year.
- j. FCPS did not notify DEQ of the location of the accumulation areas at the Grounds Department.
 - i. 9 VAC 20-60-262(B)(4) requires that a LQG notify the Department upon intent to accumulate hazardous wastes in addition to specifying the exact location of the accumulation area on site.
- k. FCPS did not make arrangements with emergency providers, nor develop a hazardous waste contingency plan for the Grounds Department facility.
 - i. 40 CFR §262.260(a) and 40 CFR §262.261(a) requires that a LQG develop a contingency response plan to minimize the health and environmental impacts from fires, explosions, or other risks of release of hazardous wastes.
 - ii. 40 CFR §262.256 requires that an LQG attempt to make arrangements with local police, fire, emergency response, and hospitals to mitigate the effects of fires, explosions, or other hazardous waste releases at the facility.

4. On August 2, 2019, based on the inspection and follow-up information, the Department issued Notice of Violation No. 2019-NRO-0006 to the FCPS for the violations described in paragraphs C(1) through C(3)(k)(ii) above.

FORTE CENTER

5. FCPS owns and operates the Forte Center in Springfield, Virginia. The Forte Center serves as general support distribution center for Fairfax County Public Schools. Operations at the Forte Center are subject to the Virginia Waste Management Act and the Regulations.
6. FCPS submitted a RCRA Subtitle C Site Identification Form (received June 26, 1986) that gave notice of regulated waste activity at the Forte Center as a LQG of hazardous waste; FCPS later downgraded this facility to a SQG on March 13, 1992. FCPS was issued EPA ID No. VAD1111099 for the Facility.
7. Following a notification from Fairfax County Public Schools Office of Safety & Security, DEQ hazardous waste compliance staff conducted an announced inspection at the Forte Center on June 19, 2019, to determine compliance with the Virginia Waste Management Act and Regulations. The Forte Center had not been previously inspected by DEQ for this purpose.

The following paragraphs describe the observations of this inspection:

- a. At the Forte Center, FCPS accumulates maintenance, laboratory, and used fluorescent bulb wastes collected and consolidated from schools and support facilities within the FCPS school system. Characteristic hazardous wastes include flammables (D001), corrosives (D002), and used bulb crusher filters (D009). Regulated medical wastes are occasionally stored on-site; universal hazardous wastes stored on-site include waste lamps, crushed lamps, batteries, and mercury containing equipment. FCPS handles, stores, and disposes of these wastes as hazardous wastes. Wastes are collected in small bottles, gas canisters, boxes, or other packaging for disposal approximately every six months, through an off-site contractor, who makes specific determinations of wastes prior to disposal. Crushed bulbs are disposed of as RCRA hazardous wastes.
- b. Available manifests indicated maximum generation rates for D001 as 70 lbs./month, D002 as 50 lbs./month, and D009 as 10 lbs./month; no manifests were available for laboratory wastes, however observations indicate the facility is an LQG generating greater than 1,000 kg of non-acute or 1 kg of acute hazardous waste per month. FCPS did not make proper notification to DEQ of its generator status for the Grounds Department.
 - i. 40 CFR §262.17(f) requires that LQG's that accumulate hazardous wastes received from VSQG's (under the control of the same owner) must notify

EPA of this fact within 30 days of receipt of the first shipment, and must maintain records of shipments for three years, in addition to complying with other independent requirements of LQG's regarding labeling and storage.

- c. No waste determinations were made at the point of generation (i.e., the VSQG facilities where wastes originated) prior to transport to the Forte Center.
 - i. 40 CFR §262.11 requires that hazardous waste determinations for each solid waste must be made at the point of waste generation.
- d. Independent requirements of LQG's were not met.
 - i. 40 CFR §262.10(a)(1)(iii) requires that LQG's meet the requirements of:
 - 1. 40 CFR §262.13, Generator Category Determination
 - 2. 40 CFR §262.18, EPA Identification Numbers and Re-Notification for SQGs and LQGs
 - 3. 40 CFR §262 Subpart B, Manifest Requirements Applicable to SQGs and LQGs
 - 4. 40 CFR §262 Subpart C, Pre-Transport Requirements Applicable to SQGs and LQGs
 - 5. 40 CFR §262 Subpart D, Recordkeeping and Reporting
 - 6. 40 CFR §262 Subpart H, Transboundary Movements of Hazardous Waste for Recovery and Disposal
- e. Wastes from the schools and support facilities were received in a variety of containers and conditions. The facility is not meeting many of the conditions for exemption requirements of a LQG for wastes accumulated in the CAA.
 - i. 40 CFR §262.17(a)(1) requires that a permitted/notification-exempted LQG accumulate hazardous wastes on site for no more than 90 days in compatible containers of good condition that are appropriately stored and inspected weekly.
- f. Hazardous waste containers located in the CAA were not properly labeled or dated.
 - i. 40 CFR §262.17(5)(i) requires that LQGs label containers with the words, "hazardous waste," the applicable hazardous characteristics of the contents, and the date when accumulation began in that container.
- g. No person in charge of hazardous waste management was trained in hazardous waste procedures.
 - i. 40 CFR §262.17(a)(7)(i)(B) requires that a hazardous waste program be directed by a person trained in hazardous waste management procedures.

- h. No written or electronic hazardous waste training plan was available.
 - i. 40 CFR §262.17(a)(7)(iv) requires that an LQG must maintain the following at the facility: the job title and name for each position related to hazardous waste management, a job description, and a description of training for each job position.
- i. No biennial report was generated for 2017 wastes.
 - i. 40 CFR §262.41(a) requires that LQGs submit EPA form 8700-13 A/B to the regional administrator by March 1 of even-numbered years for the generator shipment activities of the previous odd-numbered year.
- j. FCPS did not notify DEQ of the location of the accumulation areas at the Forte Center.
 - i. 9 VAC 20-60-262(B)(4) requires that a LQG notify the Department upon intent to accumulate hazardous wastes in addition to specifying the exact location of the accumulation area on site.
- k. FCPS did not make arrangements with emergency providers, nor develop a hazardous waste contingency plan for the Forte Center facility.
 - i. 40 CFR §262.260(a) and 40 CFR §262.261(a) requires that a LQG develop a contingency response plan to minimize the health and environmental impacts from fires, explosions, or other risks of release of hazardous wastes.
 - ii. 40 CFR §262.256 requires that an LQG attempt to make arrangements with local police, fire, emergency response, and hospitals to mitigate the effects of fires, explosions, or other hazardous waste releases at the facility.
- l. Broken lamps were observed within the open trashcans and along the walls inside the bulb crushing room.
 - i. 40 CFR §273.17, as incorporated into 9 VAC 20-60-273, requires that small quantity handlers of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.
- m. FCPS did not notify DEQ of bulb-crushing activities at this facility.
 - i. 9 VAC 20-60-1505(b)(7) requires that the generator make written notification to DEQ of the physical location of a crushing operation.

- n. FCPS could not provide generator certifications to DEQ of crushing activities of lamps received from off-site.
 - i. 9 VAC 20-60-1505(b)(4)(b) requires that generators of mercury-containing lamps that are crushed at a location separate from the facility of generation submit a certification to DEQ indicating management and responsibility of the lamps.
 - o. There was no documented operation procedure or maintenance logs for the bulb crusher.
 - i. 9 VAC 20-60-1505(B)(7)(i) requires a written procedure specifying how to safely crush, handle, and store mercury-containing lamps and how to minimize the release of mercury; 9 VAC 20-60-1505(B)(7)(j) requires that maintenance activities shall be documented and maintained.
 - p. No documentation was provided to determine if training procedures for the bulb crushers were completed.
 - i. 9 VAC 20-60-1505(B)(7)(k) requires that each unit operator receive and document initial and annual training in crushing procedures, waste handling, safety, use of PPE, emergency procedures, and cleanup of broken lamps.
 - q. A review of manifests for the removal of crushed lamps indicated that approximately three to eleven drums of crushed lamps were generated monthly. The facility is not meeting the additional requirements for air sampling.
 - i. 9 VAC 20-60-1505(B)(7)(n) requires that generators or facilities that crush more than 100 kg of bulbs per month perform and document air monitoring.
 - r. Facility personnel did not maintain required records, notifications, certifications, and reports.
 - i. 9 VAC 20-60-1505(B)(8) requires that copies of all records be kept on site and available for a period of at least three years.
8. On August 2, 2019, based on the inspection and follow-up information, the Department issued Notice of Violation No. 2019-NRO-0007 to the FCPS for the violations described in paragraphs C(5) through C(7)(r)(i) above.

APPLICABLE TO BOTH FACILITIES

9. On September 5, 2019, DEQ met with representatives of FCPS to discuss the violations. A second meeting was held on November 18, 2019, to discuss further compliance activities undertaken by FCPS. FCPS indicated during the November 2019 meeting that its plan was to have all remaining accumulated wastes at both the Grounds Department and Forte Center shipped for disposal, and that future hazardous wastes would be stored at the site of generation (i.e., the VSQG schools and support buildings) for pick-up and disposal. Further, wastes would be characterized at the point of generation, and both Facilities would be downgraded to VSQG status for the 2020 calendar year.
10. Based on the results of June 19, 2019, inspection, the meetings from September 5 and November 18, 2019, and the documentation submitted in response to these meetings, the Board concludes that FCPS has violated the following Codes and Regulations, as described in paragraphs C(1) through C(9), above:
 - a. 40 CFR 262.17(f), 40 CFR 262.11, 40 CFR 262.10(a)(1)(iii), 40 CFR 262.17(a)(1), 40 CFR 262.17(5)(i), 40 CFR 262.17(a)(7)(i)(B), 40 CFR 262.17(a)(7)(iv), 40 CFR 262.41(a), 40 CFR 262.260(a), 40 CFR 262.261(a), and 40 CFR 262.265
 - b. 9 VAC 20-60-262(B)(4), 9 VAC 20-60-1505(B)(7)(h), 9 VAC 20-60-1505(B)(4)(b), 9 VAC 20-60-1505(B)(7)(i), 9 VAC 20-60-1505(B)(7)(j), 9 VAC 20-60-1505(B)(7)(k), 9 VAC 20-60-1505(B)(7)(n), and 9 VAC 20-60-1505(B)(8)
11. FCPS has submitted documentation that verifies that the violations described in paragraphs C(1) through C(10), above, have been corrected.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code § 10.1-1455, the Board orders FCPS, and FCPS agrees to pay a civil charge of \$60,825 within 30 days of the effective date of the Order in settlement of the violations cited in this Order.

Payment shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

FCPS shall include its Federal Employer Identification Number (FEIN) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF).

If the Department has to refer collection of moneys due under this Order to the Department of Law, FCPS shall be liable for attorneys' fees of 30% of the amount outstanding.

SECTION E: Administrative Provisions

1. The Board may modify, rewrite, or amend this Order with the consent of FCPS for good cause shown by FCPS, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.
2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, FCPS admits the jurisdictional allegations, and agrees not to contest, but does not admit, the findings of fact and conclusions of law in this Order.
4. FCPS consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.
5. FCPS declares it has received fair and due process under the Administrative Process Act and the Virginia Waste Management Act and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.
6. Failure by FCPS to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. FCPS shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other unforeseeable circumstances beyond its control and not due to a lack of good faith or diligence on its part. FCPS shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. FCPS shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred

that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:

- a. the reasons for the delay or noncompliance;
- b. the projected duration of any such delay or noncompliance;
- c. the measures taken and to be taken to prevent or minimize such delay or noncompliance;
and
- d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto and any successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and FCPS. Nevertheless, FCPS agrees to be bound by any compliance date which precedes the effective date of this Order.
11. This Order shall continue in effect until:
 - a. The Director or his designee terminates the Order after FCPS has completed all of the requirements of the Order;
 - b. FCPS petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
 - c. the Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to FCPS.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve FCPS from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by FCPS and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.

13. The undersigned representative of FCPS certifies that he or she is a responsible official or officer authorized to enter into the terms and conditions of this Order and to execute and legally bind FCPS to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of FCPS.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.
15. By its signature below, FCPS voluntarily agrees to the issuance of this Order.

And it is so ORDERED this 3rd day of May, 2021.



Thomas A. Faha, Regional Director
Department of Environmental Quality

------(Remainder of Page Intentionally Blank)-----

Fairfax County School Board voluntarily agrees to the issuance of this Order.

Date: 3/26/21 By: [Signature]
Jeffrey K. Platenberg Assistant Superintendent,
Department of Facilities and Transportation Services,
on behalf of the Fairfax County School Board

Commonwealth of Virginia
City/County of Fairfax

The foregoing document was signed and acknowledged before me this 26 day of MARCH, 2021, by JEFFREY K. PLATENBERG who is ASSISTANT SUPERINTENDENT of Fairfax County School Board, on behalf of the School Board.

[Signature]
Notary Public

7725584
Registration No.

My commission expires: 2/28/2025

Notary seal:

