

Region 9 Enforcement and Compliance Assurance Division
75 Hawthorne Street
San Francisco, CA 94105
INSPECTION REPORT

Inspection Date(s):	03-15-2023	Inspection Announced: Yes	
Time:	Entry: 10:10 am	Exit: Approximately 2:30 pm	
Media:	FIFRA		
Regulatory Program(s)	Use/Misuse Inspection		
Company Name:	GEO Group, Inc.		
Facility or Site Name:	Adelanto ICE Processing Center		
Facility/Site Physical Location:	10400 Rancho Rd. and 10250 Rancho Rd.		
(city, state, zip code)	Adelanto, CA 92301		
Geographic Coordinates:			
Mailing address:	10400 Rancho Road		
(city, state, zip code)	Adelanto, CA 92301		
County:	San Bernardino		
Facility/Site Contact:	James Janecka	Facility Administrator	
	jjanecka@geogroup.com		
	760-561-6100		
Facility/Site Identifier:	N/A		
Media Number:	N/A		
NAICS:	N/A		
SIC:	N/A		
Facility/Site Personnel Participating in Inspection:			
James Janecka	GEO Group	Facility Administrator	jjanecka@geogroup.com
Chuck Leeper	GEO Group	Corporate Director of Safety and Risk Management	
Andrew Stepp	GEO Group	Assoc. Corp. Counsel	astepp@geogroup.com /561-302-0761
Joshua Johnson	GEO Group	Deputy Facility Administrator	
Inspector(s):			
Ejan Petrie	US EPA / ENF-2-3	Inspector	Petrie.ejan@epa.gov 415-972-3513

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Additional Persons Participating in Inspection:			
Emily Benayoun	US EPA / ENF-2-3	Inspector	Benayoun.Emily@epa.gov
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Inspection Report Author:			
Ejan Petrie	{Signature} EJAN PETRIE Digitally signed by EJAN PETRIE Date: 2023.05.23 16:06:03 -07'00'		
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Matt Salazar	{Signature}		
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SECTION I – INTRODUCTION

Purpose of the Inspection and Authority to Inspect and Collect Records

The purpose of the inspection was to conduct an announced, follow-up “for cause” inspection at the Adelanto ICE Processing Center (hereafter referred to as Adelanto) to follow up on EPA and California Department of Pesticide Regulations’ (CDPR) virtual inspection on 7/29/2020 and subsequent Notice of Warning issued on 3/2/2021 around allegations that GEO Group employees were applying disinfectants in a manner inconsistent with their labeling that was making detainees experience illness symptoms, which included headaches, nausea, nosebleeds, fainting, eye irritation, skin irritation, and breathing issues.

The inspection team would investigate what procedural changes Geo Group had implemented to correct noncompliance identified in EPA’s Notice of Warning and verify if GEO Group employees at Adelanto used disinfectants in a manner consistent with their labeling and in

compliance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 12(a)(2)(G), 7 U.S.C. Section 136j(a)(2)(G).

FIFRA, 7 U.S.C. § §136- 136(y), authorizes EPA to require the registration of pesticides and to regulate the distribution, sale, and use of pesticides. The term “pesticide” includes disinfectants and sanitizers. In most instances, FIFRA provides for the states to have primary enforcement authority over pesticide use occurring within its boundaries. The California Department of Pesticide Regulation (CDPR) referred the matter to EPA for investigation. FIFRA Sections 26(c), 8(b), and 9(a), 7 U.S.C. §§ 136(c), 136f(b), and 136g(a), provide EPA with broad authority to inspect “any applicator who holds or applies pesticides or uses dilutions of pesticides to provide a service of controlling pests” and to require production of documents related to the holding and application of these pesticides.

Opening Conference

Ejan Petrie led the announced “for cause” follow-up inspection of Adelanto on March 15, 2023. The inspection team also consisted of Emily Benayoun (EPA), Rieko Nishimura (EPA), Stephanie Taing (CDPR), and Brian Hughes (CDPR). James Janecka (Facility Administrator) and Joshua Johnson (Deputy Facility Administrator) represented GEO Group as the primary spokesman for Adelanto, Chuck Leeper (Corporate Director of Safety and Risk Management) answered questions related to corporate safety and risk management, and Andrew Stepp (GEO Assoc. Corp. Counsel) provided legal representation to James Janecka.

All inspectors identified themselves by presenting their federal and state credentials and exchanged business cards with Geo Group Staff. Ejan then explained the Notice of Pesticide Use/Misuse Inspection (EPA Form 3540-25) and how we were conducting a “for cause” follow-up inspection pursuant to inspection authority at Section 8(b) of FIFRA, 7 U.S.C. § 136f(b) to determine Adelanto's compliance with FIFRA in applying the disinfectants and other pesticides at Adelanto in accordance with Section 9(a) of FIFRA, 7 U.S.C. § 136g(a).

The Notice of Inspection was presented to and signed by James Janecka. Ejan explained that EPA headquarters and Region 9 received complaints of symptoms of exposure to disinfectants as outlined in the Notice of Warning issued by EPA in March 2021. Brian Hughes then gave an overview and details of the virtual inspection that occurred on 7/29/2020 and subsequent Notice of Warning issued on 3/2/2021.

Chuck Leeper asked for specifics around the allegations. Ejan responded that EPA does not have specifics nor knows if EPA could provide specifics. Ejan did convey, however, of a report that a guard may have sprayed a detainee with disinfectants and that the general nature of the complaints were related to symptoms of exposure to disinfectants, which included headaches, nausea, nosebleeds, fainting, eye irritation, skin irritation, and breathing issues.¹

¹ See <https://www.freedomforimmigrants.org/>

Brian and Ejan explained that the inspection team wanted to know what steps the facility took to comply with federal and state pesticide regulations after the Notice of Warning was issued, what products are being used now; and that we want to inspect the disinfectant storage areas, use logs, and observe applicators applying the disinfectants. Chuck Leeper specified that we can cross the bridge (of observing guards applying disinfectants) when we get there.

Facility/Site Description

The Adelanto ICE Processing Center is an immigration detention center with a capacity of approximately 1,940 detainees. According to GEO Group's website, Adelanto ICE Processing Center was purchased by GEO Group, Inc. in June 2010 from the City of Adelanto. On May 27, 2011, GEO Group entered contract with U.S. Immigration & Customs Enforcement (ICE), through an intergovernmental service agreement with the City of Adelanto. The facility has two buildings that house detainees. Adelanto East is located at 10400 Rancho Road, Adelanto, CA 92301. Adelanto West is located at 10250 Rancho Road, Adelanto, CA, 92301.

SECTION II – OBSERVATIONS

The inspection team was brought to a large conference room where the inspection team interviewed Geo Group staff that were in attendance (names listed above). The conversation is outlined in the question-and-answer format² below:

Q1. Ejan: What disinfectants, sanitizers, or other products to control Coronavirus (SARS-CoV-2) are being used at the facility and who applies said products?

(R) Janecka: Geo Group chose to use Halt® (EPA Reg No 10324-93-5741), a cleaner, disinfectant, deodorizer, Fungicide, Mildewstat, and Virucide; and Sani-T 10 Plus (EPA Reg No 10324-117-5741) for cleaning pots, pans, dishes, and surfaces in the kitchen. Specifically, Sani-T 10 Plus is their food service sanitizer for the three-compartment dip and rinse sinks in the galley. They use Xcelente®, a cleaning agent in-between the Halt applications as needed. There is no EPA Reg No for Xcelente.

Q2. Brian: Can we see a copy of the labels and approximately when did you switch products?

(R) Janecka: The changes took place in September or October following the initial inspection. We switched to a (unnamed) product³ that didn't work out because it caused surface discoloration. We ultimately switched to Halt in September or October 2021. The Halt label was forwarded to Matt Salazar at EPA prior to the inspection.

² The asterisks are used for response clarification.

³ EPA believes that this product was Diffense (EPA Reg No 5741-28), a Spartan Chemical product, based on an October 14, 2020, email from Wilson Eaton of Young Law Group to EPA Attorney Carol Bussey.

Q3. Brian: How do you choose a disinfectant?

(R) Chuck Leeper: Spartan Chemical provided a pesticide catalog for GEO Group to decide which pesticides they can use in the detention facility. Products are monitored on a quarterly basis and assessed on how they fit into their risk model, which is vetted by the facility. The disinfectant catalogue is discussed and aggregated in collaboration with health services, and their procurement is based on safety, efficacy, and intended use (e.g., floor cleaner, surface cleaner, etc.). Leeper indicated that they have access to Spartan chemists if questions arise.

a. Ejan: Do they provide a Safety Data Sheet (SDS)?

(R) Leeper: Yes, Spartan provides them, and they will provide them to EPA via formal records request.

b. Ejan: Spartan is the only company used for pesticides and disinfectants, correct?

(R) Leeper: Yes, Spartan's main office is in Ohio. They have contracts locally with distributors, who handles supplies on behalf of Spartan.

Q4. Brian: How do you determine what Personal Protective Equipment (PPE) is used and which PPE to purchase?

(R) Leeper: PPE is not provided by Spartan. PPE is determined by the product label and SDS and is procured independently.

a. Brian: Are detainees required to wear PPE?

(R) Stepp: We must get approval from ICE to discuss detainees.

b. Brian: Have guards taken over all cleaning duties?

(R) Janecka: Staff have taken over pretty much all cleaning. Detainees no longer have access to disinfectants. The population is low (around 14 detainees), and disinfectants are stored in janitor closets in vacant living areas. Chemicals are stored and mixed by machine in the same dispensing area. Spartan calibrates the machines on a quarterly schedule.

c. Brian: Is it required for guards to wear gloves and masks when using chemicals?

(R) Janecka: Yes, guards wear 4-mil gloves, masks, and face shields or goggles. *Note: Geo Group did not allow the inspection team to witness an application

d. Brian: asked the same question regarding detainees.

(R) Stepp: We can follow up via email with any questions related to detainees due to concerns over detainee privacy.

e. Ejan: How is PPE cleaned and sanitized?

(R) Janecka: It's cleaned in accordance with manufacturers specifications, unless personally owned.

Q5. Brian: Have any guards complained of exposure issues because of Halt or Sani T 10 Plus?

(R) Janecka: There have been no complaints from staff about the use of Halt or Sani T. I can recall that there was a complaint regarding training for use of the product, not the chemical itself.

**The employee allegedly complained that they did not receive adequate training on disinfectant use.*

a. **Ejan: Can we interview the guards?**

(R) **Leeper:** Let's finish this and cross that bridge when we get there.

b. **Ejan: Requested emails and records on such allegations from guards or detainees to be provided to EPA and CDPR.**

(R) **Leeper:** GEO Group will "keep open a dialogue" and would consult with their client for the disclosure.

Q6.Ejan: What is the policy that staff or management are directed to follow if there is an exposure issue?

(R) **Janecka:** The onsite medical team is called, the fire department/ambulance is also called depending on the situation, and it would be filed as Workers' Comp. There would also be an internal investigation and record of the investigation. If there is a staff illness, they are referred to an outside doctor and can call a nurse/doctor hotline if necessary.

c. **Brian: Is there still an in-house doctor?**

(R) **Janecka:** There is 24/7 medical coverage on-site. At a minimum there is a registered nurse present.

d. **Ejan: Is there a procedure in place for raising medical complaints/issues?**

(R) **Janecka:** Yes, there are locked collection boxes where anonymous complaints (observed in living quarters.) can be deposited and a virtual complaint portal. Only the medical staff have access.

e. **Brian: I recall that there was a mold issue where the detainees were living, is that still an issue?**

(R) **Janecka:** Currently there are no known mold issues.

Q7.Brian: Do you contract for yard maintenance and weed control? That company would need to be registered with the state.

(R) **Janecka:** Zenon Vargas (Zenon Vargas, 14941 La Habra, Victorville, CA 92392) is the landscaper and uses Eco Solutions Weed and Grass Killer, a 25b exempt product (verified this after the inspection). Vargas comes and does shrub work, general yard and lawn maintenance, and pest control. Orkin provides pest control within the facility mainly for ants, when they are discovered on the property. Janecka alleged that this rarely occurs.

**A Private Applicator Certificate (PA-26-40803) was provided to Stephanie to follow-up with the San Bernardino County Agricultural Commissioner. Based on the information provided, Orkin applies Talstar® Professional insecticide (EPA Reg. No. 279-3206), Advion WDG, Tekko Pro, Scion Insecticide (Gammacyhalothrin).⁴*

Q8.Ejan: What reforms were implemented after the NOW was issued, besides changing the chemical used?

⁴ *Note: Brian obtained records to ensure that the pest control companies are registered in CA. Zenon Vargas is not registered with the State of California.

(R) Janecka: Spartan came out and provided additional training for staff. Staff is now responsible for all disinfectant use. Gloves, goggles, and masks are available and required for all staff who apply disinfectants. Staff only sanitize living and high touch areas during count time when detainees are locked in cells. The chemicals are locked where detainees can't access them.

Q9. Ejan: What is the dilution rate for Halt?

(R) Janecka: I'm not positive, but we think it's 2 oz per gallon.

a. Ejan: Do you mix Halt with other chemicals or cleaning products?

(R) Janecka: No, that was a specific focus of the training and training materials provided by Spartan.

b. Ejan: Can you provide calibration records for dispensing equipment for 2 yrs., as well as the training that is provided?

(R) Leeper: Yes, we can provide them; however, we may not have two years of calibration records available now. We can request them from Spartan and email them to you.

**Some calibration records and training material were brought into the conference room to review. The inspection team briefly reviewed the materials, but we weren't provided with copies. I (Ejan) requested copies of the training documents that Spartan provides.*

c. Ejan: Are disinfectants applied with backpack sprayers?

(R) Janecka: No, they are applied with 32-ounce spray bottles.

d. Ejan: How does Spartan verify the concentration of the diluted product?

(R) Janecka: I think that they use a litmus test to verify if the concentration is within a certain color range (we later decided Janecka was perhaps referring to the litmus paper of pH strips).

e. Ejan: Has Spartan found any calibration issues with the equipment?

(R) (R) Janecka: No, there has been no failure of the equipment. Minor adjustments might be made based on pH readings. They have been a great partner. **Leeper:** The calibration depends on many factors, such as water hardness, water temperature, etc., the conditions are subject to change based on environmental factors.

f. Ejan: After disinfectants are applied, are they wiped off immediately, do you let them dry?

(R) Janecka: We follow the dry time on the label. Probably around 10 minutes? If there is residue on the surface afterwards, they wipe the surface. Sometimes Halt is applied with a rag.

g. Ejan: how long is it before detainees are allowed back in the area where disinfectant was applied?

(R) Janecka: Around 20-30 min, that's about how long count takes.

h. Ejan: Are detainees given cleaning materials for personal use?

(R) Stepp: We will defer to ICE. We will run questions through them as timely as possible. Stepp said to have Matt Salazar present these questions (questions pertaining to detainees) to his contact at ICE.

- i. **Ejan: Is there a dedicated barbershop, and are other disinfectants used in the barbershop?**

(R) Janecka: There's no dedicated barbershop. They use Barbasol to disinfect barber tools, not Halt (Barbasol container later photographed by Leeper in janitors' closet).

Q10. Brian: Do you post anything pesticide related?

(R) Janecka: Chemical storage is labeled. SDS cards are on the outside of the Janitor closet. Spartan has posters above dispenser units (photos of these were later taken and Ejan reviewed them during the walkthrough of the living quarters).

- a. **Brian: Would you be willing to post some outreach materials from CDPR?**

(R) All: Yes (Brian and Stephanie provided outreach materials regarding pesticide use and safety. The outreach materials were accepted. The inspection team suggested possibly putting them on the tablets that detainees have access to and/or posting them in the common areas.)

Tour of the Housing Unit⁵: Chuck Leeper indicated that Leeper would take us on a tour of the housing unit. Chuck Leeper stated that all the housing units are identical and that we would not be able to observe any of the units which actively house detainees. We toured the facility and entered a vacant housing unit. There was an open bay with tables used for playing games, eating, etc.; showers, living pods, a janitor closet, and a row of computers within the housing unit.

Contents of the janitors' closet: We inspected the janitors' closet which housed PPE, such as rubber boots, goggles, and an eyewash station; and an automatic dispensing machine for Halt (Disinfectant) and Xcelente (General Purpose Cleaner), and a spray bottle of Foamy Q&A and Barbasol inside of a steel cabinet along the wall of the janitors' closet. Nitrile gloves were not stored in the closet at time of inspection. 4 mil Lifeguard Nitrile Soft Medical Gloves were produced from behind a podium near the entryway when requested. The containers for Halt and Xcelente were contained in a locked storage cage near the dispenser.

Brian noted that PPE should not be stored in the same area as the chemicals to prevent corrosion and chemical cross-contamination (This is a state regulation, not federal – see areas of concern below). There were eight postings above the machines. The postings covered use instructions, required PPE, and first aid measures for Xcelente and Halt in Spanish and English; a

⁵ Images taken by Stepp: Overview of housing unit, nitrile gloves, medical grievance box, janitors' closet, postings in closet, and SDSs.

sign stating not to remove cleaning supplies from the dorm, and instructions on the disinfectant process in Spanish and English.

According to Geo Group management, only Spartan can calibrate and/or adjust the dispensing unit. They come quarterly to calibrate the dispensing machine. Stepp took photos of the box containing the gloves, an overview of the janitors' closet, the locked Halt container, the dispensing equipment, and approximately eight postings inside the closet above dispensers.

There was an SDS booklet affixed to the wall outside of the closet for Halt, Sani-T 10 Plus, Xcelente, and Foamy Q&A, EPA Reg No 5741-23 (Leeper took a photo of the SDS for Foamy Q&A). Foamy Q&A was not mentioned earlier during the formal interview session. Ejan asked what is Foamy Q&A used for and how is it applied, is it diluted? Janecka responded that "it is for staff use only to clean the stainless-steel shower stalls approximately two times per week. It is applied from the container undiluted." There were no concerns over its intended use at Adelanto after reviewing the label language. We observed approximately six, open (doorless/curtainless) stainless steel shower stalls in the living quarters and one ADA accessible stall for those with disabilities. We observed a medical grievance box (took photo) and general grievance box in the common area of the housing facility. Geo Group staff noted that only medical personnel have a key to open the box. Nobody else can review what goes into it.

The inspection team asked the following questions while touring the housing unit:

Q1. Brian: Is there any specific guidance that you follow on how to clean?

(R) All: We follow the COVID-19 Pandemic Response Requirements (PRR) document for sanitizing detention facilities (Published October 31, 2022) and the latest CDC Guidance.⁶

Q2. Ejan: When are the "counts" taken?

(R) Janecka: There's a morning count, then one 3.5 hours later, then 7.5 hours later, then the last count is 2 hours after that. I asked if we could observe a count to see how the products are used when the detainees are removed from their respective housing areas. Janecka indicated that the next count won't be for a few hours.

Q3. Stephanie: When Orkin sprays, do staff notify detainees that pesticides are going to be sprayed and that there's an infestation?

(R) Janecka: Staff notifies the detainees of pest infestation. Fire and Safety is made aware of the spraying, as well as the detainees. They educate detainees on closing food containers in their "pods" when pest control arrives. When detainees spot pests, such as cockroaches and ants, they can notify the officer, who will then notify the supervisor. When the issue has been resolved, the detainee will be notified, which is designed to yield a closed loop. When

⁶ [Safe and Proper Use of Disinfectants to Reduce Viral Surface Contamination in Correctional Facilities; ICE's Enforcement and Removal Operations COVID-19 Pandemic Response Requirements](#)

Orkin is at the facility, their staff will not interact with detainees. Geo Group is unaware of any Restricted Entry Interval (REI) of the products used by Orkin.

Warehouse Storage Inspection

We toured a warehouse outside of the facility where all of Adelanto's cleaning materials are stored inside a locked gate. One sign near the locked gate reads "Caution chemical storage area." Several different chemicals in five-gallon buckets were stacked in twos and threes and stored next to each other on top of plastic spill containment pallets. Leeper took photos of each chemical label. There were eyewash stations in the warehouse near the cleaning products. We observed the following cleaning products in 5-gallon buckets (photos taken by Stepp):

Chemicals stored in the locked cage:

- Spar Clean Pot and Pan Detergent;
- RTU Handi Spray Stainless Steel Cleaner;
- Glass Cleaner;
- Spar Clean Kitchen Delimer (injected into dishwashers) (Reg# 5741-27);
- Foamy Q&A (24- or 32-ounce bottles of Foamy Q&A) (Reg# 5741-23);
- Halt (Reg# 10324-93-5741);
- Xcelente;
- Spraybuff Shine Maintenance;
- iShine Floor Finish;
- Freezer Cleaner FP;
- All Temperature Detergent;
- L.O.E. Stripper Wax Emulsifier;
- Sani T-10 Plus (Reg# 5741-13);
- Alcohol Free Forming Hand Sanitizer BETCO; and
- Spartan Tribase Multipurpose Cleaner.

Closing Conference

After inspecting the warehouse, we were led back to the conference room where Ejan covered the general Confidential Business Information (CBI) notice and agreed to submit a formal records request to Andrew Leeper, as well as our contact at ICE, David Gomez, for the period of August 2021 to present, including Spartan and GEO Group's training materials. Ejan stated that Geo Group will have 10 days after the records request is issued to claim CBI on any documents that they submit.

The inspection team indicated there may be additional concerns or additional items to follow-up on after reviewing any provided documents. We noted two immediate areas of concern, pesticide storage and postings (a California state regulation) and that the 4 mil nitril gloves used

to apply disinfectants did not appear to be chemical resistant as required by the Halt label. GEO Group asked for a glove recommendation that would meet the label requirement for chemical resistance. We indicated that we would confirm with our toxicologist or resident Environmental Health and Safety Officer to get clarification on chemical resistant glove specifications and note it in the inspection report. Brian noted that CDPR will look up Vargas to see if the company is registered with the state. Brian noted that Orkin is registered. Geo Group requested that we specify which areas of concern were related to State of California regulations and which were related to federal regulations on the inspection report.

No records were collected during the inspection; however, the Receipt for Pesticide Use/Misuse Samples (EPA Form 3540-26) was completed based on the items that EPA and CDPR want to review and evaluate (Appendix 2).

SECTION III – AREAS OF CONCERN

EPA Regulatory Concerns

1. The label for Halt may be misbranded. It's unlawful to sell or distribute a misbranded pesticide under FIFRA section 12(a)(1)(E), 7 U.S.C. Section 136j(a)(1)(E). The supplemental label provided to Geo Group from Spartan states that Halt disinfects at a dilution ratio of 2 ounces/gallon of water; however, the EPA approved master label directs the applicator to apply the product at 6 ounces/gallon of water for general or broad-spectrum disinfection. It appears that Halt is being under concentrated for its intended use as a disinfectant.
2. The label for Halt indicates that the applicator must wear "chemical resistant gloves." Chemical resistant gloves are required to be at or above 14 mils in thickness⁷. The gloves provided by Geo Group (Lifeguard Nitrile Soft Medical Gloves) for their applicators applying Halt are 4 mils in thickness. Under FIFRA Section 12(a)(2)(G), 7 U.S.C. Section 136j(a)(2)(G), it is unlawful to use any registered pesticide in a manner inconsistent with its labeling.

CDPR Regulatory Concerns

**Under Title 3 California Code of Regulations (CCR) 6720 when disinfectants are handled, the employer is exempt from complying with provisions of Title 3 CCR 6723 (Hazard Communication for Pesticide Handlers), 3 CCR 6724 (Handler Training) , 3 CCR 6726 (Emergency Medical Care), 3 CCR 6732 (Change Area) , and 3 CCR 6738 (Personal Protective Equipment Care), provided the*

⁷ [Label Review Manual in Section 10-9](#)

employer instead complies with the corresponding provisions of Title 8 CCR (California OSHA Regulations).

1. Title 3 CCR 6723 requires the employer to display a copy of a completed Hazard Communication Information for Employees Handling Pesticides in Non-crop Settings (Pesticide Safety Information Series Leaflet N-8), at a central location in the workplace. A N-8 document was not displayed at the central location;
2. Title 3 CCR 6726 requires the employer to post in a prominent place at the work site, the name, address, and telephone number of a facility able to provide emergency medical care whenever employees will be handling pesticides. The emergency medical care information was found in a binder located outside the janitor's closet storing pesticides, but not posted (definition of "display" is found in Title 3 CCR 6000); and
3. Title 3 CCR 6738.3 requires the employer to assure appropriate chemical-resistant gloves that are 14 mils or thicker to be worn by employees when their use is required. The gloves used are 4 mil nitrile gloves.

SECTION IV – DOCUMENTS REQUESTED AFTER THE INSPECTION

EPA emailed an updated list of records and a few follow-up questions to Andrew Stepp and David Gomez from ICE DHS on March 31, 2023 (Appendix 3).

Records were received on April 20, 2023. The response included a letter from Greg Munson, Geo Group's attorney (Appendix 4), along with a secure link to download the requested documents from the firm's sharefile system. One of the PDFs, photographs (Appendix 4b), was claimed FIFRA CBI and is thus not included in this report. The attachments that were not claimed as FIFRA CBI are included under Appendix 4.

In the records request, EPA also asked the following questions regarding detainees. The responses were provided in a letter from Greg Munson (Attachment 4):

Q1. *Have any guards or detainees complained of exposure issues because of Halt or Sani-T-10 Plus or any other disinfectant used in the facility?*

(R): A detainee complained that the detainee observed officers carrying "spray bottles they use for chemicals on the same cart" as the detainee's water container. See "Follow Up Question 1 Document.pdf."

Q2. *Do the detainees have access to any cleaning materials for use in their housing units and pods?* Yes, but only if the detainee completed the necessary training, and when cleaning products are brought into the unit, the detainee is under direct supervision.

Q3. *Are detainees required to wear PPE when they use said cleaning products?* Yes.

SECTION V – LIST OF APPENDICES

Appendix 1 – Notice of Pesticide Use/Misuse Inspection (EPA Form 3540-25)

Appendix 2 – Receipt for Pesticide Use/Misuse Samples (EPA Form 3540-26)

Appendix 3 – Email Information Request to Andrew Stepp and David Gomez

Appendix 4 – Response to EPA Information Request (PDFs)/Receipt for Samples

- a. Disinfectant Logs;*
- b. Photographs taken by Andrew Stepp (Claimed FIFRA CBI - Under Review);*
- c. Detainee Training Records;*
- d. Detainee Work Agreements;*
- e. Dilution Rate for Halt;*
- f. Labels and SDSs for Pesticides;*
- g. Medical Staff Contact Information;*
- h. Training Material-SDS;*
- i. Training Materials; and*
- j. Follow Up Question 1 Document.pdf*