

IAQ Policy Criteria PVAC Breathing Easy Training Program

School District Policy

IAQ Program Goals

- Reduce the levels of indoor air pollutants through preventive measures such as routine maintenance activities, periodic building evaluations and inspections, and IAQ policies.
- Provide and maintain adequate airflow by repairing and maintaining ventilation equipment, which will promote a comfortable and healthy learning and working environment.
- Respond to IAQ-related concerns and problems in a prompt and thorough manner, and effectively communicate the progress of investigations and their resolution to all interested parties. The prompt reporting and resolution of IAQ issues has the potential to prevent serious problems from developing, which will help to prevent potential health effects, discomfort, and unnecessary costs.

IAQ Reporting and Response Process

The IAQ Coordinator (note what position this is, e.g. principal, senior custodian) should request concerned staff, students, and parents to report their IAQ concerns in writing. A written description of the concerns reduces misunderstanding and creates a history that can be referred to at a future date. All complaints shall be put in writing by the complainant and shall follow the “Reporting Process” to initiate an official IAQ concern reporting process. _____ shall document and inform affected parties of the progress and resolution of the issue in writing about the measures taken. Information collected must be processed and stored according to the school district’s recordkeeping policies (each district should reference this system).

Communication Protocol

Communication is a critical element to successful IAQ management. The IAQ Coordinator and other district authorities try to limit misinformation and confusion through the use of effective communication. In order to develop and maintain the trust of the community and staff, the IAQ Coordinator and other designated district employees should communicate with relevant parties in a prompt, honest, and courteous manner until the issue is resolved. Every time an IAQ concern is addressed or resolved, the IAQ Coordinator shall report the measures taken and the resolution of the identified concern to the appropriate parties.

In the unlikely event of an IAQ emergency, the district will accommodate the needs of students, parents, and staff. One or more contacts shall be selected to handle the media and update the community during a crisis. No one other than the district representative(s) should discuss IAQ-related issues with the press. The media will be alerted by [_____ name of district’s media contact] when it is necessary to provide information to a broader audience. Every effort will be made to share appropriate information as soon as it becomes available to the school district.

Note: each district may want to specify the vehicles used to communicate with staff and parents.

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IAQ Emergency Response Process

Note: Please check your school and town's existing emergency system before developing one to coordinate with existing efforts and systems, and ensure that they are in sync.

An emergency is defined as an unforeseen circumstance that requires immediate action, assistance, or relief. This includes situations that are potentially life threatening, such as:

- Spills of hazardous materials;
- Complaints of severe headaches, nausea, heart problems, and combustion odors; and
- Diagnosed Legionnaire's disease or tuberculosis.

In addition, emergencies include situations where there is limited time available to prevent serious property damage, such as flooding in a carpeted area or health problems.

It is up to the discretion of the school administrators to identify and react to emergencies on a case-by-case basis. If doubt exists about whether exposure to a specific hazard constitutes an emergency, a precautionary approach may be used where the matter is handled as an emergency.

District officials must respond to emergencies immediately. If the problem cannot be resolved with in-house resources, external help should be acquired (e.g. local health agency, IAQ professionals). If a hazard poses an immediate health threat to the students and staff, the affected building areas must be evacuated. (Note: each district needs to determine at what point an evacuation would be necessary.)

References: modified by Lynn Rose from EPA IAQ Tfs Action Kit, IAQ Coordinator's Guide, Section 3 - Model IAQ Management Plan

District Specific Protocols

Ambient (outside) Air Pollution Issues

- Will explore the possibility of scheduling deliveries of oil after school for schools who have exhaust entrainment problems.
- Will work with Mr Mahoney to enforce the state's no idling law for buses, trucks and cars for schools who have problems with exhaust entrainment.
- Will identify school grounds management activities (leaf blowing, snow blowing, and grass cutting) that generates exhaust which is entrained into some of the school buildings. Since it is not feasible to schedule all of these services before or after school hours, nor is it possible to shut down the school ventilation systems during those activities, parks staff and city vendors should be made aware and as careful as possible to minimize these impacts.
- Entrained Odors and Exhaust
 - At locations where exhaust is a problem, work with the principal to find ways to mitigate problems from grass mowing, leaf and snow blowing.
 - Locate dumpsters far enough away from building to prevent odors from entering school.
 - Ensure air exhausted from the building is not entrained into an air intake or window.
 - Ensure air intakes are not entraining exhaust from adjacent buildings or outside activities.

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Indoor Air - Ventilation

- Conduct annual maintenance on all HVAC fan belts, motors, etc.
- Check drip pans on air handlers, air conditioners, unit ventilators, etc.

IAQ Pollutants - Mold Remediation

- The District will determine what level of remediation requires the use of an outside contractor.
- The District will train in house custodians on response to mold incidents, including mold remediation that is conducted in-house.
- The District will provide adequate PPE and containment strategies for custodians to safely conduct the remediation.

School Building-Based Staff Guidelines**IAQ Team and Program Information**

- Every school building will have an Environmental Team who is responsible for implementing the IAQ Program, overseeing building and occupant based environmental health and safety issues, and conducting assessments of their school's environmental systems and building facilities, including; IAQ, IPM, hazardous materials management and reduction, etc.
- Every school Environmental Team will have a Coordinator who is responsible for coordinating with the school district and serving as the Team liaison.
- Every school will create an area to post the IAQ information, and centralize and make assessable the IAQ Program's written documents.

Department or Staff Specific IAQ Guidelines**General Staff IAQ Guidelines**

- Food should not be left in staff offices. When it is necessary to store food in offices, it must be kept in airtight, sealed containers to minimize the potential for pests, odors, and biological growth.
- Heating, Ventilation and Air Conditioning
 - Maintain a three foot clearance around all air supply and exhaust vents, including the unit ventilator and operable windows.
 - Contact a custodian to adjust any air supply or return.
 - Report any problems (odors, temperature issues, lack of fresh air, etc.) to the Head Custodian, including: problem, when it started, when it happens, frequency and duration of the problem, and if there is a pattern.

Custodians

- Ventilation
 - HVAC air handlers –inspect, conduct preventative maintenance and change filters per manufacturers guidelines, at least once a year and when there are IAQ issues.
 - Unit Ventilators – inspect, conduct preventative maintenance and change filters per manufacturers guidelines. Filters may need to be changed possibly 2 – 4 times per year,

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with a minimum of least once a year and when there are IAQ issues. Schedule these filter changes based on seasonal issues that might clog them up such as pollen. Some filters may require changing more frequently due to their location, such as those with an air intake on a busy street.

- **Mold Remediation**
 - Report all leaks immediately.
 - Report all complaints of mold odor or verified areas of mold damage.
 - Remediate mold only as directed, when directed. This includes removal of moldy materials (e.g. ceiling tiles) or cleaning of moldy surfaces. The use of bleach or any biocide is prohibited.

Nurses

- Be aware of student and staff allergies to mold, scents, latex, and any other hazardous products.
- Provide general information on existence and magnitude of student and staff allergies and environmental sensitivities to the Environmental Team. (Not confidential information such as names of student.)
- Possibly assist in the collection of environmental health survey information when conducted.

Science

- Ensure chemical storage rooms are on a dedicated ventilation system that runs continuously
- Ensure that fume hoods are tested on an annual basis.

Classroom Teachers

- **Heating, Ventilation and Air Conditioning**
 - Maintain a three foot clearance around all air supply and exhaust vents, including the unit ventilator and operable windows.
 - Contact a custodian to adjust any air supply or return.
 - Report any problems (odors, temperature issues, lack of fresh air, etc.) to the Head Custodian, including: problem, when it started, when it happens, frequency and duration of the problem, and if there is a pattern.
- **Mammals - Do not have pets in rooms where students and staff have documented allergies and asthma. If you do have pets;**
 - Locate cages away from the air supplies and air returns, to prevent their byproducts from being released and distributed throughout the room.
 - Remove them in rooms where students and staff have documented allergies and asthma.
 - Change the bedding, food and water frequently.
 - Store pet food in sealed containers.
- **Plants and Insects**
 - Locate away from the air supplies and air returns, to prevent their byproducts from being released and distributed throughout the room.

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- Remove these items in rooms where students and staff have documented allergies and asthma. Insects such as hissing cockroaches and ladybugs produce allergens that can trigger asthma.
- Use plant trays and keep well drained.
- Aquariums
 - Locate away from carpeted areas in case of a leak or accident involving water.
 - Locate away from areas where they can be hit or broken.
- Birds
 - Nests - can contain disease and parasites (looking for a host since the birds are gone). Keep in a covered container and have students wash hands after handling.
 - Bird Feeders – bird waste can contain disease such as Chlamydia or pneumonia. They must be kept away from windows where bird droppings and by-products can land on windowsill, be blown in the window or tracked in through a door.
- General Notes
 - Air Quality – report any water leaks or damage, or mold to the Head Custodian.
 - Health Reactions - report student and staff reactions to allergens, products, air quality, etc. to the school nurse, head custodian, and as directed by the Principal.
 - Allergens in Personal Belongings – children and staff inadvertently bring in allergens on their clothes and belongings. Some strategies to address this problem include;
 - Whenever possible, isolate coats and other items that harbor allergens in an enclosed space such as a closet, or out in the hallway if the air circulation system in the classroom is not shared (on the same system) with the hallway.
 - Enclosing items in sealed plastic bags. This is also a useful strategy if you find bedbugs on a child's belongings).

Anti-Idling Policy

Delivery and bus pickup and drop off zones have been located away from building outdoor air intakes to ensure that exhaust fumes do not enter the facility. **[School district's name]** prohibits buses and cars from idling while waiting to pick up or drop off students. Buses shall idle no longer than the time required to bring engines to proper operating temperature and to defrost all windows. This policy is not in effect when temperatures fall below 32 degrees Fahrenheit.

Following is a sample anti-idling policy and memo. The announcement letter should address the main issues covered by the school's anti-idling policy:

- Explicitly state when/where/for how long buses are allowed to idle.
- Define individuals and vehicles covered by the policy.
- Outline the stages and dates of policy implementation.
- State the enforcement procedures taken when the policy is violated.
- Identify the appropriate contact for questions and concerns.

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The anti-idling policy should be placed in the personnel manual (including that of bus drivers), employee handbook, school by-laws, or another location that will facilitate the distribution of this information to all affected individuals. Signs can also be posted in areas where cars, buses, or delivery trucks wait to remind drivers that their engines should be turned off.

References: modified By Lynn Rose for PVAC Breathing Easy Training from EPA IAQ TFS Action Kit, IAQ Coordinator's Guide, Section 3 - Model IAQ Management Plan and Lynn Rose's work.

Fragrance Policy Criteria

Issues - When scented products have been blamed for adversely affecting a person's health, some or all of the following symptoms are reported¹:

- Headaches, dizziness, numbness, lightheadedness, nausea
- difficulty with concentration, confusion
- fatigue, weakness, malaise
- loss of appetite
- depression, anxiety, insomnia
- upper respiratory symptoms, shortness of breath
- skin irritation

Allergic and asthmatic patients, as well as those with other conditions, report that certain odors, even in the smallest amounts, can trigger an attack. The severity of these symptoms can vary. Some people report mild irritation while others are incapacitated and/or must give up many 'normal' activities in order to avoid exposure (such as going to public places).

Definition - There is no exact definition for "scent-free", "fragrance-free" or "unscented". Products labeled as "unscented" may actually contain ingredients that are used to mask or hide the smell of other ingredients.

Products Containing Scents

- Shampoo, conditioners and hairsprays
- deodorants
- colognes & aftershaves
- perfumes
- lotions, creams, body oils and cosmetics
- potpourri and candles
- industrial and household chemicals
- soaps
- air fresheners & deodorizers
- diapers
- some types of garbage bags
- Laundry soaps
- Hand soaps and hand hygiene products

Use of Personal Care Products – options for a policy position and language:

- Prohibition

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- Employees - To avoid the possibility of exposing co-workers or visitors to potentially harmful airborne irritants, please refrain from wearing heavily scented or liberally applied lotions, aftershave, hairsprays, or colognes/perfumes.
- Parents and Children – Determine whether this policy also applies to parents and children. This target audience will be harder to persuade and control.
- Use - To use scents or fragrances sparingly, consider:
 - Employees
 - Applying scents/fragrances at home or outside.
 - Using one spray instead of two.
 - Spraying perfume in the air and walking through it.
 - Using the 2-foot radius rule: can a family member or friend smell your fragrance from more than 2-feet away from you? If yes, you may be using too much fragrance.
 - Parents and Children
 - Refrain from purchasing scented products for your children whenever possible.

Valid Complaints:

- In order for a complaint to be valid under this policy, there must be a link between a complainant's health condition and an effect on the complainant's ability to work. Keeping a complaint log/diary that documents the incidents and what the reported suspected triggers are may provide a way to legitimize the situation. A visit to a doctor may or may not help document the problem, since many doctors are unfamiliar with chemical sensitivity health effects and symptoms.
- This policy does not address circumstances in which an employee simply finds a co-worker's fragrance unappealing or unpleasant.

Implementation:

- Education will take place in staff meetings and through the Square one Newsletter, which will provide an overview of the policy, the reasons for its implementation, and how it will be implemented. There should also be a provision as to how an infraction of this policy will be handled.
- There will be a one-month grace period after the ratification of this policy to provide time for discussions and modifications of personal fragrance use.
- Determine how you will conduct outreach and education to parents who maybe using scented products on their children or sending in scented products for use on their children.

ⁱ Scent-Free Policy for the Workplace, Canadian Centre for Occupational Health and Safety