

Indoor Air Quality¹

Depending on Assistance Needed, Call:	
DGS – Environmental Health and Safety	202–576–8962
School IAQ Team	
IAQ POC	
IAQ Lead	
School Nurse	

Situation Description

The Department of General Services – Environmental Health and Safety (EHS) is committed, alongside DCPS, to provide learning and working environments that are free of potential air hazards, and to promptly investigate complaints that may be related to poor indoor air quality (IAQ). IAQ is air in which there are no known contaminants at harmful concentrations as determined by the District of Columbia Department of Environment (DDOE), and the Environmental Protection Agency (EPA).

In order to assure that a substantial majority of people utilizing local facilities do not express dissatisfaction to the indoor air, DGS –ESH has put in place an IAQ policy. This policy will guide participating professionals in the reduction of indoor air pollutants through preventive measures outlined by the Healthy Schools Act of 2010 and the EPA’s Tools for School program.

Concentrated efforts will include routine mechanical and non-mechanical maintenance activities, periodic building evaluations and inspections, and IAQ-explicit policies, which will mature and adapt to site specific locations. Ultimately school staff will be able to identify, resolve, and eventually prevent IAQ problems.

¹ This Protocol contains information developed and implemented by DGS-ESH and DCPS, and can be used as a guideline for other District LEAs. Each LEA should review and edit the contents to conform to their procedures and contacts.

Procedures

The Indoor School Air Quality Team, guided by the Healthy Schools Act of 2010, and the indoor air quality initiative - Tools for School, is established to ensure a safe and healthy building environment for local students and school related professionals. The quality of the indoor environment is directly related to the cleanliness of the building and proper maintenance of its various systems.

To achieve improved mechanical maintenance and proper housekeeping, individual tasks within these areas and required schedules for performing assigned tasks are a necessity. DGS-EHS and DCPS have restructured and reassigned responsibilities to address these tasks that play an important role in maintaining a quality building environment. A comprehensive building assessment system-wide is in place as needed to establish a base line and identify maintenance, safety, environmental, and housekeeping activities required to ensure that the building environment is maintained at the preferred level. If these activities are performed correctly, in a timely manner, and with adequate oversight, many of our environmental inadequacies will be prevented.

Performance, Roles, and Response Practices

Tools for School, as presented by the EPA, addresses the major factors affecting the building environment of education facilities in the District of Columbia, and the success of the program relies heavily on key school staff members and air quality related professionals. These individuals will compose the School IAQ Team.

The School IAQ Team will identify and address faulty components by utilizing customized schedules and checklists for preventative maintenance, housekeeping, and integrated pest management. Information gathered from these customized schedules and checklist will be verified by periodic building assessments (e.g. coordinator inspections and school-based personnel walk-throughs), which will consist of examining various, completed checklists and other documentation on file for the building.

The progression of the clean air initiative will center on the success of the School IAQ Team. The Team can contact DGS Environmental Health and Safety (ESH). This designee will assume the role of IAQ Coordinator.

EHS Staff responsibilities include:

- Acting as the key contact person within the district to respond to and address IAQ issues and concerns.
- Coordinating the development and management of the district's IAQ Management Plan. This includes establishing and overseeing an IAQ Team, coordinating building walkthrough inspections, coordinating the building system evaluations, coordinating the investigations of reported IAQ issues and concerns, and modifying the IAQ Management Plan to fit the district's specific needs and objectives.
- Responding to IAQ concerns and issues that are discussed or reported.
- Coordinating the IAQ Team's activities and meetings, including distribution of the IAQ checklists.

- Coordinating the annual review of the Policy, which involves building walkthrough inspections, building systems evaluations, and revising the Policy to include new information.

The DGS-ESH staff designee will lend expertise in the process of establishing clean air initiatives, and enhancing the communication of all DCPS professionals to consider and promote indoor air quality.

School IAQ Team

Led by the IAQ Coordinator, the IAQ Team is involved in the following efforts.

- Supporting EHS to ensure good IAQ in all facilities and areas.
- Contributing through the creation and implementation of a customized IAQ plan. The members distribute the IAQ checklists and other critical information to the appropriate staff members.
- Meeting regularly to review and resolve IAQ issues.
- Meeting to review existing and future policies central to quality indoor air, which includes the completion of walkthrough inspections of school buildings, and key building systems evaluations.
- Meeting to evaluate and respond to IAQ concerns that have been reported to the district. The Team takes steps or recommends measures to resolve the reported concern.
- Maintaining IAQ Team reports, and other documents that are paramount to IAQ improvement and success.

Team members and their roles may vary slightly from school to school; however, the following assignments are guidelines to create a holistic approach for environmental compliance.

The following individuals are members of the School IAQ Team:

Position

Point of Contact
(POC):
Custodian

School Nurse

IAQ Team Lead

Principal (appointed representative)

Specific Duties

Possess intimate knowledge of the building, assist with walk-through inspections

Track health symptoms on a school map; assist in educating school occupants

Coordinate checklist distribution and collection, support and direct school staff

Program Protocol

The safety and health of students and staff is the first priority. ESH has established an environmental health-issue protocol to ensure that all complaints/concerns are thoroughly investigated. This Protocol will be followed any time a community group, student, parent, or staff member alleges one of the following:

- Building or air quality is causing illness or ongoing symptoms to an individual.
- Building or air quality is causing loss of work/school time.
- A member of the medical profession states that the building is causing illness to building occupants.
- A doctor's letter states an illness is caused by the building environment.

Reporting response -IAQ routine building information will be passed from the IAQ Team Lead to EHS on a monthly basis or as otherwise scheduled by individual school IAQ teams. The overall objective is to report information that would suggest building trends. These trends, in time, will assist in learning the building structure. The reported information will represent irregular temperature occurrences, water intrusion sightings, general complaint areas, and other IAQ information deemed important by the building occupant's safety.

The routine information reported should reflect concerns gathered or presented by all school team members. A major function of the IAQ Team Lead is to gather such information and report it to EHS. *The reporting format preference is individually team based, but the information obtained should be guided by a designated IAQ check list.*

In addition to a monthly check list, an annual building survey will be repeated each school year.

An urgent IAQ matter will be listed in routine reporting, but the issue will immediately be reported to EHS through Smart DGS, and if necessary to district wide emergency services. If contact is not established in a timely manner, proceed by calling DGS –ESH at 202.587.8962.

Complaint response -The IAQ Team will be comprised of professionals with indoor environment expertise (EHS), intimate knowledge of the building occupants (Nurse and IAQ Team Lead), and experience with the buildings components and/or mechanical functionality (Building Foreman (POC) and DGS personnel). Environmental health issues should be directed to the IAQ Team Lead. The complaint will be quickly investigated by all or select members of the team to insure that the building structure is performing at optimal levels. Including, but is not limited to Microbial Management, Preventative Maintenance, and Communication.

Moreover, IAQ Team members can attend periodic training sessions when presented by EHS. Many items discussed will address low cost or no cost resolutions (such as unblocking inside vents or removing debris from an outside vent).

For additional information, contact the DGS Environmental Health and Safety at 202–576–8962.

Microbial Management

Microbes, such as mold, bacteria, and viruses, are a significant cause of illness, health symptoms, and discomfort. School staff should be aware that the easiest way to control microbial growth is to control moisture.

Signs of water intrusion and microbial growth should be investigated during the walkthrough inspections, building system evaluations, and other efforts. The maintenance staff should be informed about damaged buildings systems and components that cause water leaks and water condensation. School staff must make the necessary repairs and adjustments in a prompt manner. Materials damaged by water should be replaced when possible. Damp or wet materials must be dried within 48 hours (preferably within 24 hours).

Educating school staff and occupants on the common occurrence of microbes, such as mold spores, is paramount to the understanding of the more general principles of microbial concepts. For an example, comprehending the relevance of mold spores in the absence of moisture can prevent unnecessary angst and the continuing spread of misinformation.

Preventive Maintenance and Operations

Preventive maintenance involves routine inspection, adjustment, and repair of building structures and systems, including the heating, ventilating, and air conditioning system (HVAC); unit ventilators; local exhaust; fresh air intakes; and flooring. Preventive maintenance plays a major role in maintaining the quality of air by assuring that the building systems are operating effectively and efficiently. Moreover, it helps to maintain comfortable temperatures and humidity in occupied spaces.

The scheduling of all preventative maintenance will be the responsibility of the assigned department or agency unit. For example, DGS will oversee ventilation components that are inspected and maintained on a routine basis, and likewise, DCPS will concentrate on both non-mechanical and non-structural IAQ matters. Unless a mechanical or structural concern is interconnected to integrated pest control, microbial in nature, or otherwise identified as a health and safety issue. This does not limit any group and its ability to report and/ or investigate.

School staff should contact the Environmental Health and Safety at 202.576.8962 if an issue is deemed complex in nature.

Communication

Communication is a critical element to successful IAQ management. EHS 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, EHS 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 School IAQ Team Lead should report the measures taken and the resolution of the identified concern to the IAQ Team members and other 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 appointed representative(s) should discuss IAQ-related issues with the press. The media will be alerted by the appointed representative 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.

The IAQ Team may inform parents and staff about:

- The IAQ Policies and ongoing efforts, how to view the Policies upon request, and how to best report IAQ concerns.
- How to contact the IAQ Coordinator about IAQ issues.
- Where to find self-help information on how to evaluate IAQ in the school and to learn about structural features and operational practices of the school buildings.

DGS-EHS has set standards for Cleaning and Chemicals, Flooring, Preventive Maintenance and Operations, Construction and Renovation, Microbial Management, and Communication procedures, and will continue to perfect schedules and standards to use in areas of routine building operation and maintenance affecting the learning and working environments.

The Healthy Schools Act of 2010 will serve as a continuing back drop for all DC Public Schools, while this policy and its procedures will evolve as yearly performance evaluations of the Tools for School air quality guide are assessed.

IAQ Regulations and Requirements

- District of Columbia Code § 38-821.01, Healthy Schools Act
- District of Columbia Code § 28-4201-4202, Proficiency Requirement for Radon Testing
- 29 CFR Part 1926.58, Construction Industry Asbestos Standard
- 29 CFR Part 1910.1001, General Industry Asbestos Standard
- 29 CFR Part 1910.1000, OSHA Standards for Air Contaminants
- 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants
- Renovation, Repair and Painting Rule (RRP), (EPA, 2008)
- Hazard Standards for Lead in paint, Dust, and Soil (TSCA Section 403)
- Residential Lead-Based Paint Hazard Reduction Act of 1992 – Title X (Section 504)
- The Resource Conservation and Recovery Act (RCRA)
- The Toxic Substances Control Act (TSCA)
- The Clean Air Act (CAA)
- Safe Drinking Water Act (SDWA)

These policies should be viewed as primary sources of information for indoor air quality in DC Public School facilities. For additional information contact the Department of General Services – Environmental Health and Safety at 202-576-8962.