



Dallas School District

Healthy and Safe Schools Plan

December 29, 2016

This plan serves to meet the requirement for a Healthy and Safe Schools Plan as required under OAR 581-022-2223 and is the updated plan from the draft plan submitted on October 1, 2016.

Three health related programs identified in this plan, specifically Radon, Lead Paint and Integrated Pest Management, are already required by either State or Federal legislation and the Dallas School District has the required plans and manages those programs according to statute. In addition, the District also has a plan and program in place for management of Asbestos, which is not a part of the requirements of OAR 581-022-2223, but is also required by Federal rule.

The remaining health related program referenced in OAR 581-022-2223 pertains to Lead in Water. Currently there is technical guidance and recommendations from the EPA regarding lead in water, known as EPA's "3T's for Reducing Lead in Drinking Water in Schools". Oregon Health Authority (OHA) refers to this document for school districts to follow and interpret. This has resulted in many variations among districts in understanding the requirements, as they are recommendations, not requirements and districts have made various interpretations.

Currently there is no State or Federal legislation regarding the lead in water program or any requirements such as testing frequency, mitigation requirements, which fixtures to test (bathroom sinks, showers etc.) or retesting frequencies to name just a few of the areas school districts have been tasked with determining on an individual basis. Lack of guidance from OHA has led to confusion on many of these points as districts struggle to interpret the 3T's guidance, unfairly leaving districts open to criticism and second guessing.

Due to the recent concerns regarding lead in water, the Dallas School District anticipates there will be State legislation introduced during the next legislative session which will address many of the current questions and confusion around the lead in water recommendations. This should make the ability to plan and carry out and monitor lead in water programs much more clearly detailed and outlined. The District will amend this plan as required if and when legislation is enacted pertaining to this program. In the interim, the District will follow the 3T's guidance as it understands and interprets such guidance.

Dallas School District remains firmly committed and dedicated to providing buildings and facilities which are healthy and safe for all our students, staff and patrons.

1. Responsible Person

OAR 581-022-2223(5)(a) states that the Healthy and Safe Schools Plan must include the position within the school district's administration responsible for maintaining and implementing the Healthy and Safe Schools Plan.

The person responsible for maintaining and implementing the Healthy and Safe Schools Plan is:

Name: Kevin Montague
Position: Facilities Director
Contact Info: 111 SW Ash Street
Dallas, OR 97338
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2. List of Buildings

OAR 581-022-2223(1) states each school district must develop a Healthy and Safe Schools Plan for all buildings owned or leased by the school district where students and staff are present on a regular basis. OAR 581-022-2223(5)(b) further states that the Healthy and Safe Schools Plan must include a list of all facilities that are included in the Healthy and Safe Schools Plan.

Accordingly, as Dallas School District currently does not lease any buildings, this plan covers the following buildings owned by Dallas School District:

<u>Building name</u>	<u>Building address</u>
Dallas High School	1250 SE Holman Ave., Dallas, OR 97338
Lacreole Middle School	701 SE Lacreole Ave., Dallas, OR 97338
Whitworth Elementary School	1151 SE Miller, Dallas, OR 97338

Lyle Elementary School	185 SW Levens Street, Dallas, OR 97338
Oakdale Heights Elementary School	1375 SW Maple, Dallas, OR 97338
Daily Living Skills	1085 Main Street, Dallas, OR 97338
Morrison Campus Alternative Program	1251 Main Street, Dallas, OR 97338
Dallas School District Office	111 SW Ash Street, Dallas, OR 97338

3. Radon

OAR 581-022-2223(5)(c) states that the Healthy and Safe Schools Plan must include a plan to test for elevated levels of radon as required under ORS 332.167. Radon measurement plans from school districts were due to OHA on September 1, 2016. Dallas School District has developed a radon testing plan and submitted said plan to OHA as required by ORS 332.167. The current copy of the districts radon plan can be accessed here:

http://media.wix.com/ugd/ad31a0_975a4d8e2562465282402768ab660e06.pdf

Currently the district is evaluating two different testing protocols to determine the most effective testing method to use for testing. Once the determination is made on which testing method will provide the best results testing will begin. At this time it is anticipated testing will commence in January of 2017, approximately four years before legislation requires testing to be done.

Dallas School Districts radon plan will be updated if the method determined to be used for testing is a method not currently described in the current radon plan.

4. Lead in Drinking Water

OAR 581-022-2223(5)(d) states that the Healthy and Safe Schools Plan must include a plan to test for and reduce exposure to lead in water used for drinking or food preparation. Any lead testing done must be performed by an OHA accredited lab.

Dallas School District contracted with an environmental services firm to perform testing throughout the district. In September of 2016, 552 fixtures throughout the district were tested following the EPA 3 T's protocols to test during normal occupancy periods. The results of the tests can be found on the district web site at the following link:

<http://www.dallas.k12.or.us/lead-information-in-dallas-school-d>

Fixtures which tested at or above the EPA action level were turned off until follow up testing was received. With the exception of 3 fixtures which remain off, follow up testing showed clear reduction in lead levels after running the water for 30 seconds. In some instances the follow up tests found no detectable amount of lead.

Since the district tested every fixture in every school, not just drinking fountains and food prep fixtures as recommended by OHA, signage has been placed on fixtures which tested at or above the EPA action level with the first test and below the action level on the follow up test. The signage indicates “For Handwashing Only” or “Allow water to run for 30-60 seconds prior to consumption” and has been determined to be an adequate mitigation effort for those fixtures which met or exceeded the EPA action level on the first test but were below the level on the follow up test. This mitigation effort was determined adequate given the results of all drinking fountains except two returned results below the action levels on the first test. Those two fountains, as well as fixtures which tested at or above the action level on both tests were shut off and remain off.

Currently, there is no research stating how often school districts should test for lead in water. The results of the testing performed in September 2016 showed a clear correlation between lead levels and fixture use, with fixtures used less frequently or not at all being the majority of the fixtures which tested at or above the action level on the first test. Since fixture use tends to change throughout the school year and year to year as teachers and room uses change, the District will continue to evaluate the testing requirement and will follow any legislation enacted as it pertains to lead in water.

5. Lead Paint

OAR 581-022-2223(5)(e) states that the Healthy and Safe Schools Plan must include a plan to reduce exposure to lead paint which includes the compliance with the United States Environmental Protection Agency’s Renovation, Repair and Painting Program Rule (RRP).

The RRP rule requires individuals and firms conducting renovation, repair and painting projects on pre-1978 homes and child occupied facilities be certified to follow lead safe work practices. Child occupied facilities is defined in OAR 333-070-0085(11) as:

"Child-occupied facility" means a building, or a portion of a building, constructed prior to 1978, visited regularly by the same child, under age six, on at least two different days within any week (Sunday through Saturday), provided that each day's visit lasts at least three hours and the combined weekly visit lasts at least six hours, and the combined annual visits last at least sixty hours. Child-occupied facilities may include, but are not limited to, day-care centers, preschools and kindergarten classrooms. Child-occupied facilities may be located in target housing or in public or commercial buildings. With respect to common areas in public or commercial buildings that contain child-occupied facilities, the child-occupied facility encompasses only those common areas that are routinely used by children under age six, such as restrooms and cafeterias. In addition, with respect to exteriors of public or commercial buildings that contain child-occupied facilities, the child-occupied facility

encompasses only the exterior sides of the building that are immediately adjacent to the child-occupied facility or the common areas routinely used by children under age six.

Dallas School District recently completed a limited environmental evaluation of all the buildings within the district to determine the lead paint levels in each facility. Every building except Post High was tested. Post High was not tested as it was constructed after 1978 when the lead paint ban took effect. Every building returned at least one sample positive for lead in the paint (above the level of detection per OSHA guidelines) and many samples tested were identified as lead based (above 5000 ppm per EPA and OHA guidelines). The results of the lead paint assessment can be found on the district website at this link:

<http://www.dallas.k12.or.us/lead-information-in-dallas-school-d>

In order to comply with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule, Dallas School District will only contract with certified lead based paint renovation contractors licensed by the Oregon Construction Contractors Board OR use district staff who are certified by the Oregon Health Authority to perform RRP work on any child occupied facility as required by rule or statute.

6. Integrated Pest Management

OAR 581-022-2223(5)(f) states that the Healthy and Safe Schools Plan must include a plan to implement integrated pest management (IPM) practices as required under ORS 634.700 through 634.750.

Dallas School District has adopted an integrated pest management plan as required under ORS 634.700 through 634.750. Community members can access a copy of the IPM plan here:

http://blogs.oregonstate.edu/schoolipm/files/Low_Impact_Pesticide_List.pdf

7. Communication

OAR 581-022-2223(5)(g) states that the Healthy and Safe Schools Plan must include a plan to communicate results for all tests performed in accordance with the Healthy and Safe Schools Plan that includes the following:

- The school district must make all test results available to the public within five days of receiving the results;
- The school district must make the results available to the public by posting the results on the district website, sending notice of the results over the email system, and making the results available in hardcopy at the main administration office; and

- The school district must provide detailed information explaining the test results.

Dallas School District will make all test results and detailed information explaining the test results available to the public within five business days of receiving the results. Results will be made available by posting the results on the district website, sending notice of the results over the email system, and making the results available in hardcopy at the main administration office.

This plan was finalized December 29, 2016 as required by OAR 581-022-2223 which requires final versions on or before January 1, 2017. The plan will be updated as necessary due to required changes or legislative action.

Original draft version date:
October 1, 2016

By: Kevin Montague
Facilities Director

Revision date/Final version:
December 29, 2016

By: Kevin Montague
Facilities Director