North Marion School District 15
20256 Grim Road NE, Aurora, Oregon 97002

Phone: (503) 678-7100
FAX: (503) 678-1473
www.nmarion.k12.or.us

HEALTHY AND SAFE SCHOOLS PLAN

North Marion School District's Healthy & Safe Schools Plan is in compliance and meets the requirements of OAR 581-022-2223.

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 or public charter school'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: Sean Dyer
Position: Director of Facilities & Maintenance
Contact information: Office#: (503)678-7110/email: sean.dyer@nmarion.k12.or.us

2. List of Buildings

This plan covers the following buildings:

Building Name	Building Address
North Marion Primary School	20257 Grim Rd NE, Aurora, OR 97002
North Marion Intermediate School	20237 Grim Rd NE, Aurora, OR 97002
Intermediate Portable Building	20237 Grim Rd NE, Aurora, OR 97002
North Marion Middle School	20246 Grim Rd NE, Aurora, OR 97002
Middle School Portable Building	20246 Grim Rd NE, Aurora, OR 97002
North Marion High School	20167 Grim Rd NE, Aurora, OR 97002

3. Radon

The 2015 Legislature passed House Bill (HB) 2931 so that elevated radon levels in Oregon schools would be known. House Bill 2931 later became Oregon Revised Statute (ORS) 332.166-167. As directed by this statute, all testing of schools must be done on or before January 1, 2021 and the testing results sent to OHA and posted on the school or school district's website. This plan will develop the protocols necessary for compliance. OHA's Testing for Elevated Radon in Oregon Schools, specifically Appendices A and D will be used to guide this effort. Below is the plan developed for North Marion School District 15.

North Marion School District 15
20256 Grim Road NE, Aurora, Oregon 97002

Phone: (503) 678-7100
FAX: (503) 678-1473
www.nmarion.k12.or.us

Per ORS 332.166-167, School Radon Measurement Teams (i.e. personnel appointed to measure a school site for elevated radon) must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Testing will occur in all frequently occupied spaces simultaneously per school site. Examples include: offices, classrooms, conference rooms, gyms, auditoriums, cafeterias and break rooms. A minimum of one detector for every 2,000 sq. ft. of open floor space or portion thereof is required. United States Environmental Protection Agency (USEPA) studies indicate that radon levels on upper floors are not likely to exceed the levels found in ground-contact rooms. Testing rooms on the ground-contact floor or above unoccupied basements or crawlspaces is sufficient to determine if radon is a problem in a school. Areas such as rest rooms, hallways, stairwells, elevator shafts, utility closets, kitchens storage closets do not need to be tested.

Initial and follow-up testing, as needed, will use passive test devices. Active devices (electrically powered, continuous radon monitors) may be used in follow-up testing of locations, if needed, where it is important to determine that radon levels vary according to the time of day. Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. "Closed building conditions" are defined as keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test. Testing will occur between October and March in any given school year. Short term testing will be used with passive test kits will be used in "closed building conditions." Test kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally. The following is a detailed protocol instruction checklist:

1. A Test Kit Placement Log and a Test Kit Location Floor Plan will be prepared for each school in which radon measurements are made. Schools will use their emergency/fire escape plan as a template. Test kit location will be accurately recorded on both a Log and Floor Plan. Test kits or testing services must meet the current requirements of the national certifying organizations, National Radon Proficiency Program (NRPP, www.nrpp.info) or the National Radon Safety Board (NRSB, www.nrsb.org). Testing must be done following the directions on the test kit.

2. Per ORS 332.166-167, school radon measurement teams must, at a minimum, conduct initial measurements in all frequently occupied rooms in contact with the soil or located above a basement or a crawlspace. Room examples include offices, classrooms, conference rooms, gyms, auditoriums, cafeterias and break rooms.

3. The number of test kits used to measure radon (detectors) must be determined by counting the number of appropriate rooms. One detector kit is used for each room that is 2,000 square feet or less. Additional test kits are needed for larger rooms.

4. Added to this number will be the test kits needed for Quality Assurance purposes.

North Marion School District 15
20256 Grim Road NE, Aurora, Oregon 97002

Phone: (503) 678-7100
FAX: (503) 678-1473
www.nmarion.k12.or.us

5. Test kits will be placed in all rooms in contact with the soil or located above a basement or crawlspace that are frequently occupied by students and school staff.

6. Testing will occur during the time that students and teachers are normally present (during weekdays).

7. In addition to placing detectors, additional test kits will be provided to serve as quality assurance measures (duplicate, blank, and spike measurements). Quality Assurance procedures will be conducted as described in OHA's Testing for Elevated Radon in Oregon Schools.

8. All test kits placed in the school site (detectors, duplicates, and blanks) must be noted on the Device Placement Log and Floor Plan by their serial number.

9. Test kits should be placed.

    a. Where they are least likely to be disturbed or covered up.

    b. At least three feet from doors, windows to outside or ventilation ducts.

    c. At least one foot from exterior walls.

    d. At least 20 inches to six feet from floor.

    e. About every 2,000 square feet for large spaces (e.g., a 3500 square foot gymnasium would require two test kits)

Along with the five-item placement protocol above, School Radon Measurement Teams can simply place the test kit on the teacher's desk or up on a bookshelf, out of the way of students. To prevent tampering, kits may be suspended from a wall or ceiling (using string and thumb-tack/tape). If they are suspended, they should be 20 inches to 6 feet above the floor, at least 1 foot below the ceiling.

10. Test kits must **NOT** be placed:

    a. Near drafts resulting from heating, ventilating vents, air conditioning vents, fans, doors, and windows.

    b. In direct sunlight.

    c. In areas of high humidity such as bathrooms, kitchens, laundry rooms, etc.

    d. Where they may be disturbed at any time during the test

11. Testing with short-term test kits must be used under closed conditions (closed windows/doors except for normal exit/entry).

a. Closed conditions: Short-term tests should be made under closed conditions in order to obtain more representative and reproducible results. Open windows and doors permit the movement of outdoor air into a room. When closed conditions in a room are not maintained during testing, the subsequent dilution of radon gas by outdoor air may produce a measurement result that falls below the action level in a room that actually has a potential for an elevated radon level. Schools shall only be tested for radon during periods when the HVAC system is operating as it does normally.

b. All external doors should be closed except for normal use – structural and weatherization defects need to be repaired prior to testing.

c. Closed conditions must be verified when placing and retrieving test kits.

12. Short-term test kits will be placed during colder months (October through March).

a. Colder months: Because testing under closed conditions is important to obtain meaningful results from short-term tests, the District will schedule testing during the coldest months of the year. During these months, windows and exterior doors are more likely to be closed. In addition, the heating system is more likely to be operating. This usually results in the reduced intake of outside air. Moreover, studies of seasonal variations of radon measurements in schools found that short-term measurements may more likely reflect the average radon level in a room for the school year when taken during the winter heating season.

b. The District will check and document local weather forecasts prior to placing test kits. Do not conduct short-term measurements (2-5 days) during severe storms or period of high winds. The definition of severe storm by the National Weather Service is one that generates winds of 58 mph and/or ¾ inch diameter hail and may produce tornadoes.

13. Test Kits will be placed during weekdays with HVAC (heating, ventilation, air conditioning) systems operating as they do normally.

Suggested timeline:

Monday morning – Place kits (detectors/duplicates/blanks) per Test Kit Placement Log created for school. Record data, as needed, on Log.

Thursday morning – Pick up kits, record as needed, ship with (previously requested & received) spiked test kits to Radon Measurement Laboratory.

a. Air conditioning systems that recycle interior air may be operated.

b. Window air conditioning units may be operated in a re-circulating mode, but must be greater than 20 feet from the test kit.

c. Ceiling fans, portable humidifiers, dehumidifiers and air filters must be more than 20 feet from the test kit.

d. Portable window fans should be removed or sealed in place.

e. Fireplaces or combustion appliances (except for water heaters/cooking appliances) may not be used unless they are the primary source of heat for the building.

f. If radon mitigation systems are in place in the school, they should be functioning.

14. The District will not conduct initial measurements under the following conditions:

    a. During abnormal weather or barometric conditions (e.g., storms and high winds). If major weather or barometric changes are expected, it is recommended that the 2 to 5-day testing be postponed. USEPA studies show that barometric changes affect indoor radon concentrations. For example, radon concentrations can increase with a sudden drop in barometric pressure associated with storms.

    b. During structural changes to a school building and/or the renovation of the building's envelope or replacement of the HVAC system

15. After receiving the results of the initial testing, School Radon Measurement Teams will follow the "Interpreting initial results" section of the OHA's testing for Elevated Radon in Oregon Schools.

Follow-up Measurements

Follow-up testing (in rooms with initial short-term measurement of 4.0 pCi/L or higher) should start within one month after receiving the initial test results. Follow-up testing must be made in the same location in a room. When conducting follow-up testing using short-term methods will be done in the same conditions as the initial measurement. Follow-up testing using passive short-term test kits should follow the same Quality Assurance procedures and requirements (i.e. percentages of duplicates/blanks/spikes), including quality assurance calculations. Follow directions under Radon Test Placement Strategy and Protocol Checklist and Test Kit Placement again.

Report of Results and Distribution

ORS 332.166-167 requires that school districts make all test results available: to the district's school board; the Oregon Health Authority (to post on its website), and readily available to parents, guardians, students, school employees, school volunteers, administrators and community representatives at the school office, district office or on a website for the school or school district.

US EPA, OHA Oregon Radon Awareness Program, and numerous non-governmental groups recommend that the school district take action to reduce the radon level in those rooms where the

average of the initial and follow-up short-term kit results OR the result of the long-term kit used in follow-up is 4.0 pCi/L or more.

Initial testing will be conducted in accordance with ORS 332.166-167 before January 1, 2021. Because buildings age and ground beneath them settles, radon entry may increase due to cracks in the foundation. For that reason, ORS 332.166-167 requires that schools be tested once every 10 years regardless of initial testing results or whether mitigation was done.

Suggested times, for retesting, in addition to that required under ORS 332.166-167, are as follows:

1. Current national guidelines (ANSI/AARST, 2014) recommend that school buildings be re-tested every five years.

2. If radon mitigation measures have been implemented in a school, retest these systems as a periodic check to ensure that the radon mitigation measures are working. EPA does not provide a specific interval, but OHA recommends that schools with radon mitigation measures retest every 5 years.

3. Retest after major renovations to the structure of a school building or after major alterations to a school's HVAC system. These renovations and alterations may increase radon levels within a school building.

4. If major renovations to the structure of a school building or major alterations to a school's HVAC system are planned, retest the school before initiating the renovation. If elevated radon is present, radon-resistant techniques can be included as part of the renovation.

GLOSSARY

Radon - A gaseous radioactive decay product of radium.

Blanks - Measurements made by analyzing unexposed (closed) detectors that accompanied exposed detectors to the field. The School District use of blanks is to assess any change in analysis result caused by exposure other than in the environment to be measured. Background levels may be due to leakage of radon into the detector, detector response to gamma radiation, or other causes.

Closed-Building Conditions - Means keeping all windows closed, keeping doors closed except for normal entry and exit, and not operating fans or other machines which bring in air from outside. Fans that are part of a radon-reduction system or small exhaust fans operating for only short periods of time may run during the test.

Duplicates - Duplicate measurements provide a check on the precision of the measurement result and allow the user to make an estimate of the relative precision. Large precision errors may be caused by

detector manufacture or improper data transcription or handling by suppliers, laboratories, or technicians performing placements. Precision error can be an important component of the overall error. The precision of duplicate measurements are monitored and recorded as quality records.

Spikes – Measurements used to assess the accuracy of a lab analysis and/or how accurately detectors supplied by a laboratory (i.e. test kit manufacturer) measure radon. “Spikes” are test kits that have been exposed to a known concentration of radon in a chamber approved by the National Radon Proficiency Program (NRPP) or National Radon Safety Board (NRSB). The process for completing this aspect of a radon measurement effort’s Quality Assurance/Quality Control plan is laid out in the Radon Test Placement Strategy and Protocol Checklist below.

Appendix A: Test Kit Placement Guide

Once the number of test kits is determined, they will be placed in the frequently-occupied rooms as identified in the "What Rooms Should Be Tested?" section above.

a. Be sure to check these items before placing the radon test kits:

- ☐ Closed building conditions have been maintained in the building for 12 hours.
- ☐ HVAC system is operating as it normally would when students and faculty are present.
- ☐ Testing is being done during a time that students and faculty are present.

b. As detectors are placed in the rooms determined during section 1, thorough and accurate data needs to be recorded on the device log and floor plan (see sample below).

Protocol for all test kits include the following; be sure that each detector placed is:

- ☐ in a location where it will be undisturbed
- ☐ out of direct sunlight
- ☐ three feet from all doors and windows
- ☐ four inches from all other objects
- ☐ at least 1 foot from all exterior walls
- ☐ at least 20 inches to 6 feet from the floor
- ☐ out of direct air flow from vents
- ☐ four feet from heat source

To protocol above, School Measurement Teams in other states simply place the test kit on the teacher's desk or up (out of the way of students) on a bookshelf.

c. Specific protocol for duplicate measurements. If the test kit you are placing is duplicate measurement also be sure to:

- ☐ Placed duplicate (side-by-side) test kit 4-5 inches away from test kit for that room.

d. Specific protocol for blank measurements. If the test kit you are placing is a blank measurement, also be sure to:

- ☐ Unwrap blanks, open, but then immediately close and reseal them.
- ☐ Place the test kit next to the detector kit(s) for the room 4-5 inches away.

e. Specific protocol for spiked test kits.

- ☐ Arrange for the spiked test kits to arrive back from the Certified Performance Test Chamber to the

School Measurement Team as close to the day that kits are retrieved from the school as possible. [See *Quality Assurance Procedures for a School Radon Measurement Progra*m in OHA's testing for Elevated Radon in Oregon Schools.]

f. Testing Period.

The minimum length of time test kits should be left out is 48 hours, but not exceed seven days. [It's best to follow test kit manufacturer's instructions for more specific recommendations.] It's best if devices should be left in place for four days to ensure optimum results.

Many schools place short-term kits on Monday morning and pick them up on Thursday morning. Retrieving Kits: Once the testing period has ended, all test kits placed at a school site (detectors, duplicates, and blanks) need to be retrieved. This should be done on the same date. Complete the data sheet when retrieving detectors.

- ☐ Record ending date and time (kits were pick up) information, per the "Test Kit Placement Log" [Appendix D of OHA's Testing for Elevated Radon in Oregon Schools.]
- ☐ Record ending information on the test kit package (if required).

g. Prepare and mail all kits.

- ☐ Seal and prepare test kits to be mailed to the lab by the manufacturer's instructions.
- ☐ Include those spiked kits (not identified as such) in the same box(es) as other kit types.
- ☐ Mail all test kits (detectors, duplicates, blanks, spikes) to the Radon Measurement Laboratory using a mail service that guarantees delivery to the laboratory within two days at maximum, but **preferably overnight** shipping.

Sample Language

The district has adopted a radon plan as required by ORS 332.167. Community members can access a copy of the radon plan here: [http://www.nmarion.k12.or.us/Page/2269]. Test results will be made public and posted to the district website here: [http://www.nmarion.k12.or.us/Page/2359]

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. If the district, education service district, or public charter school does conduct lead testing of drinking water, an Oregon Health Authority accredited lab must be used for all testing.

The Oregon Department of Education and the Oregon Health Authority recommend that all school districts and childcare facilities test for lead in school water and take corrective action if lead levels are elevated. This plan will develop the protocols necessary to meet the requests of *The Oregon Department of Education and the Oregon Health Authority.* Below is a plan developed for North Marion School District 15.

The EPA (Environmental Protection Agency) has created a manual titled "The 3 T's for Reducing Lead in Drinking Water in Schools". This publication introduces and describes the 3T's for reducing lead in drinking water.

The EPA's 3t's are:

Training school officials to raise awareness of the potential occurrences, causes, and effects of lead in drinking water; assist school officials in identifying potential areas elevated lead may occur; and establishing a testing plan to identify and prioritize testing sites.

Testing drinking water in schools to identify potential problems and take corrective actions necessary.

Telling students, parents, staff, and the larger community about monitoring programs, potential risks, the results of testing, and remediation actions.

Community members can access a copy of The *EPA's 3Ts technical guidance* here: *https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf*

North Marion School District is committed to providing a welcoming, respectful, and safe community to its student, staff and community members. With lead levels being found in schools across the state, North Marion School district will make a commitment to the following steps.

1. ***Identify sources of lead****: Schools and childcare facilities should test all taps used for drinking or food preparation in the building to identify any lead problems. Follow the Environmental Protection Agency's 3 T's Revised Technical Guidance to ensure that samples for lead are collected properly and from the right places. Use an OHA-accredited drinking water laboratory to analyze samples for lead.*

2. ***Stop access****: Prevent access to water taps that have more than 20 parts per billion (ppb) of lead. This should include shutting off taps, covering water fountains, and providing bottled water to students and staff members.*

3. ***Communicate****: Make results from tests for lead in water available to students, families, and the community as quickly as possible.*

4. ***Mitigate and correct****: Replace the sources of lead in building plumbing. Again, EPA 3T's Guidance should be followed.*

5. ***Continued Monitoring:*** *Continue the practices in place to test for lead every 3 years as required by the Oregon Health Authority for any registered small water systems in Oregon, such as ours.*

North Marion School District will be conducting lead tests on all water faucets used for food preparation, drinking, and other human consumption. Examples of these are drinking fountains, sinks (classroom and restroom), and all kitchen sink faucets. Any sink faucets that are not considered for human consumption and

not tested will have a placard with notices that water should not be consumed, installed in visible locations from the sink or faucet. Lead tests will be submitted no later than December 1st 2016 to an Oregon Health Authority (OHA)-accredited lab using U.S. Environmental Protection Agency protocols.

Identifying Sources of Lead:

Testing Processes:
Any test completed in district will follow the EPA's recommended "Two-Step Sampling Process". Below is an overview of the steps recommended by the *EPA*. These steps are outlined in more detail in the 3T's for Reducing Lead in Drinking Water in Schools Manual

Step 1 – Initial Sampling:
Initial samples are taken from prioritized outlets (e.g., bubblers, fountains) in the facility. These samples determine the lead content of water sitting in water outlets that are used for drinking or cooking within your building(s). A sample is also collected from a tap located as near as possible to the service connection (i.e., the pipe connecting your facility to a larger water main). Initial service connection samples are flush samples, but the initial samples taken from bubblers, fountains, and other outlets used for consumption are all first-draw samples (i.e., the stagnant water is sampled before any flushing or use occurs). The goal of Step 1 is to compare the lead level of water from your facility's service connection to water that has remained stagnant between 8 and 18 hours in an outlet or fixture.

Step 2 – Follow-Up Flush Sampling:
If initial test results reveal lead concentrations greater than 20 ppb in a 250 mL sample for a given outlet, follow-up flush testing described in Step 2 is recommended to determine if the lead contamination results are from the fixture or from interior plumbing. EPA has established this trigger for follow-up flush testing to ensure that the sources of lead contamination in drinking water outlets are identified. The table below provides details of an additional sub-step that might be taken to eliminate particulate debris that can collect on aerators and screens as a source of lead.

In Step 2, follow-up flush samples are collected and analyzed from outlets whose initial first draw results revealed lead concentrations greater than 20 ppb. The purpose of Step 2 is to pinpoint where (i.e., fixtures or interior plumbing) lead is getting into drinking water so that appropriate corrective measures can be taken.

As with initial first draw samples, follow-up flush samples are to be taken before a facility opens and before any water is used. Follow-up flush samples generally involve the collection of water from an outlet where the water has run for 30 seconds. This sampling approach is designed to analyze the lead content in the water in the plumbing behind the wall. The sampler should induce a small (e.g., pencil-sized) steady flow of water from the outlet or other sample location. The sampler should be careful not to begin with a high rate of flow, and then reduce the flow just prior to sampling. Sudden changes in flow could stir up sediments or cause sloughing of pipe films that would not be characteristic of typical water use patterns.

Alternative Step 2:
If initial first draw sampling results reveal concentrations higher than 20 ppb in the 250 mL sample for a given outlet, a contributing source of the elevated lead levels could be the debris in the aerator or screen of the outlet. By cleaning the aerator or screen and retesting the water following the initial first draw sampling procedures you can identify whether or not the debris is a contributing source to elevated lead levels in your facility.

Stopping Access:

Upon test results, any outlet that produces lead levels at or above 20 ug/L (Parts per Billion), will be shut down for consumption use until remediation steps are taken and the site is retested showing levels below 20ug/L. If test results effect a significant amount of fixtures in a building or district, clean water sources will be provided for students and staff until actions are taken and retests show a level below 20 ug/L.

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 required under the Healthy and Safe Schools Plan that includes the following:

- *The school district or public charter school must make all test results available to the public within five business days of receiving the results;*
- *The school district or public charter school must make the results available to the public by posting the results on the school district or public charter school 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 or public charter school must provide detailed information explaining the test results.*

Mitigate and correct:

North Marion School District will take immediate action on any site with test results at or above 20 ug/L (Parts per Billion). Steps that will be taken are described above in the sampling Step 2 and Alternative Step 2. If necessary, fixtures and plumbing related to those fixtures, will be replaced and the site will be retested. No fixture showing levels at or above 20 ug/L will be made available for consumption use until retest results show a level below 20 ug/L.

Continued Monitoring:

North Marion School District runs solely on its own water and sewer system. We have a state of the art treatment plant that filters and cleans the water before entering our buildings. Due to this situation, we are required, by the State of Oregon, to perform regularly scheduled tests on our water. Below is a list of required tests that we perform as requested by Oregon Health Authority, Drinking Water Division. North Marion School District will continue these testing guidelines to monitor our water on multiple levels. If any of these results drop below the state guidelines, we will make decisions as to the appropriate measures that need to be taken to protect the health of our students, staff and community.

We submit the following tests to Oregon Heath Authority:
Lead & Copper – every 3 years
Stage 2 DBP (HAA5 & TTHM) – yearly in September
Arsenic – every 3 months
IOC (Inorganic Contaminants) – every 9 years
Nitrate – yearly
SOC (Synthetic Organic Contaminants) – every 3 years
VOC (Volatile Organic Contaminants) – every 3 years

For more information related to these tests, you can go the link provided: https://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Pages/index.aspx

Here at North Marion School District 15, we take pride in our district and how it serves our community. We strive to produce a welcoming, respectful, and safe community. Where we hold our selves accountable to global standards. Where teaching and learning is challenging, dynamic and engaging. Where students are empowered to lead productive lives as stewards of their world.

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 that includes the following compliance with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule.

The Renovation, Repair and Painting Program Rule requires that individuals and firms conducting renovation, repair and painting projects on pre-1978 homes and child-occupied facilities (child care and schools) be certified to follow lead-safe work practices. For more information on this rule, you can visit the following website: https://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/LeadPoisoning/ChildCareSchools/Pages/RulesforRenovating.aspx

In order to comply with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule, North Marion School District [will contract with certified contractors OR
District staff that are certified to perform the work]. A list of work that will require a certified Contractor or district employee is listed below

What RRP activities are covered under the rule?
The rule applies to renovation, repair and painting work in pre-1978 homes or child-occupied facilities. Renovation means modifying existing structure that disturbs painted surfaces. Renovation includes:

- Modification of painted or varnished surfaces
- Restoring building surfaces
- Window repair or replacement
- Painting preparation (scraping and sanding)
- Removal of walls, ceilings, plumbing and windows
- Weatherization projects

What activities are not covered under the rule?
The rule does not apply to the following:

- 1978 or post-1978 construction
- Zero-bedroom dwelling or housing that is for the elderly or disabled and no children are expected to reside in the home or building
- Lead abatement projects - abatement and inspection professionals are covered under a different set of regulations known as Lead-Based Paint Activities regulations.
- Renovation projects that do not involve lead-based paint
- Individuals performing renovation, repair or painting work on their own home
- Minor repair and maintenance. Minor repair and maintenance means disrupting less than 6 square feet of paint per room or less than 20 square feet of exterior paint.

6. Integrated Pest Management

To ensure the health and safety concerns of student, staff and community members, the district shall adopt an integrated pest management plan (IPM)[1] which emphasizes the least possible risk to students, staff and community members and shall adopt a list of low-impact pesticides for use with the IPM plan.

The IPM plan is a proactive strategy that:

1. Focuses on the long-term prevention or suppression of pest problems through economically sound measures that:

    a. Protect the health and safety of students and staff;
    b. Protect the integrity of district buildings and grounds;
    c. Maintain a productive learning environment; and
    d. Protect local ecosystem health.

2. Focuses on the prevention of pest problems by working to reduce or eliminate conditions of property construction, operation and maintenance that promote or allow for the establishment, feeding, breeding and proliferation of pest populations or other conditions that are conducive to pests or that create harborage for pests;

3. Incorporates the use of sanitation, structural remediation or habitat manipulation or of mechanical, biological and chemical pest control measures that present a reduced risk or have a low-impact and, for the purpose of mitigating a declared pest emergency, the application of pesticides that are not low-impact pesticides;

[1] See Model Integrated Pest Management Plan for Oregon Schools at http://www.ipmnet.org/tim/IPM_in_Schools/Model_School_IPM_Plan_Main_Page.html. Policy effective July 1, 2012.

4. Includes regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage;

5. Evaluates the need for pest control by identifying acceptable pest population density levels;

6. Monitors and evaluates the effectiveness of pest control measures;

7. Excludes the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests;

8. Excludes the application of pesticides for purely aesthetic purposes;

9. Includes school staff education about sanitation, monitoring, inspection and pest control measures;

10. Gives preference to the use of nonchemical pest control measures;

11. Allows the use of low-impact pesticides if nonchemical pest control measures are ineffective; and

12. Allows the application of a pesticide that is not a low-impact pesticide only to mitigate a declared pest emergency or if the application is by, or at the direction or order of, a public health official.

The district shall designate the maintenance supervisor as the Integrated Pest Management Plan Coordinator give them the authority for overall implementation and evaluation of the IPM plan.

Integrated Pest Management Plan Coordinator

The IPM Plan Coordinator shall:

1. Attend not less than six hours of IPM training each year. The training shall include at least a general review of integrated pest management principles and the requirements of IPM as required by Oregon statute;

2. Ensure appropriate prior notices are given and posted warnings have been placed when pesticide applications are scheduled;

3. Oversee pest prevention efforts;

4. Ensuring identification and evaluation of pest situation;

5. Determine the means of appropriately managing pest damage that will cause the least possible hazard to people, property and the environment;

6. Ensure the proper use and application of pesticide applications when non-pesticide controls have been unsuccessful;

7. Evaluate pest management results; and

8. Keep for at least four years following the application date, records of applied pesticides that include: a.

   A copy of the label;

   b. A copy of the Safety Data Sheet;
   c. The brand name and USEPA registration number of the product;
   d. The approximate amount and concentration of pesticide applied;
   e. The location of where the pesticide was applied;
   f. The type of application and whether the application was effective;
   g. The name(s) of the person(s) applying the pesticide;
   h. The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide;
   i. The dates and times for the placement and removal of warning signs; and

   j. Copies of all required notices given, including the dates the IPM Coordinator gave the notices.

9. Respond to inquiries about the IPM plan and refer complainants to Board policy KL - Public Complaints;

10. Conduct outreach to district staff about the district's IPM plan.

END OF POLICY

Legal Reference(s):

ORS 634.116
ORS 634.700 to-750

Cross Reference(s):

EB - Safety Program
EBA - Buildings and Grounds Inspection
GBE - Staff Health and Safety

Sample Language

The district has adopted an integrated pest management plan as required by ORS 634.700 through 634.750. Community members can access a copy of the IPM plan here: [http://policy.osba.org/nmarion/E/EBB D1.PDF].

7. Communication

North Marion 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