Indoor Air Quality

Scope
This policy shall address Indoor Air Quality (IAQ) concerns/complaints from both employees and students. The program is intended to cover chemical substances covered under 1910:1000, as well as microbial materials.

Purpose
This policy has been implemented to ensure that all members of the College community are adequately protected from any potential IAQ problems. Additionally, the policy demonstrates the protocol that will be followed when an IAQ complaint is brought to the attention of the College.

Process
Indoor Air Quality Complaints:
- All complaints regarding IAQ issues must be forwarded to the Director of Facilities Management (“Director” from here forward).
- When possible, the time of day, symptoms experienced, observations made, and whether there has been any odor or visible contamination should be noted.

Investigation
- The Director will investigate the complaint.
- The Director will identify the suspected contaminant and suggest and implement remedial measures.
- Specifically, the Director will identify the following in conjunction with the investigation:
  - Probable source of the suspected contaminant and its extent and magnitude
  - Number of building occupants with symptoms likely related to the suspected contamination
  - Availability of reasonable and effective measures to mitigate the suspected contaminant
  - Duration of the symptomatic building occupants’ exposure to the suspected contaminant
- The Director will prepare a written report consisting of the findings and recommended remedial action.

Ongoing Complaints: Due to the heightened sensitivity of some individuals, some IAQ complaints will be either difficult or impossible to resolve. The following guidelines will be followed:

- Employee Ongoing Complaint
  - Ongoing employee complaints will be forwarded to the Human Resources Department.
  - Human Resources will request any medical documentation detailing symptoms related to the suspected contaminant.
  - Human Resources will further request the employee’s physician to document any restrictions the employee has in connection with the suspected contaminant.
  - Human Resources will engage in an interactive process with the employee to determine whether reasonable accommodations can be made.

- Student Ongoing Complaint
  - Ongoing student complaints will be forwarded to the Disability Services Office.
  - The Disability Services Office will request medical documentation detailing the student’s symptoms and any limitations or medical concerns the student may have as a result of the IAQ issue.
  - The Disability Services Office will engage in the interactive process to determine whether any further measures can be taken.

Environmental Assessment
- A visual inspection will be conducted first to determine the cause and extent of the problem.
- When possible, the problem should be resolved before remediation begins.
- Bulk, surface, or air samples may only be necessary as part of a medical evaluation.
When mold is involved, air, bulk, or surface samples may be necessary to determine the remediation strategy.

Samples will be conducted by individuals trained in proper air sampling methods for microbial/chemical contaminants.

Remediation

- To the extent possible, water infiltration (including high relative humidity (RH)>60%) will be stopped, cleaned up, and dried immediately.
- Whenever possible, the response will be within 48 hours to prevent or limit mold growth.
- The goal of remediation will be to remove or clean contaminated material in a way that prevents the emission of fungi and dust contaminated with fungi from leaving a work area and entering an occupied or non-abatement area, while protecting the health of the workers performing the abatement.
- Remediation projects will be conducted in a manner consistent with the following guidelines:

1. Small to medium sized projects (up to 30 square feet)
   - Remediation can be conducted by Environmental Services. They will be trained on proper cleanup methods, personal protective equipment, and potential health hazards.
   - Personal Protective Equipment (PPE) will include eyewear, gloves and an N95 respirator or equivalent.
   - The work area must be unoccupied. Vacating people from adjacent areas is not necessary but is recommended for babies, those that have recently undergone surgery, immune suppressed people, and those with allergies.
   - The work area must be covered with a plastic sheet and sealed with tape to contain dust and debris.
   - Dust suppression methods, such as misting, should be used.
   - Contaminated materials that cannot be cleaned should be removed from the building in a plastic bag.
   - The work area and areas used by remedial workers for egress must be HEPA vacuumed and cleaned with a damp cloth and/or mop with a detergent solution.

2. Medium to large sized projects (over 30 square feet)
   - A safety and health professional with experience performing microbial investigations will be consulted prior to remediation activities.
   - Personnel trained in the handling of hazardous materials and equipped with full body protection, respiratory protection, eye protection, and gloves will do the work.
   - Complete isolation of the work area from occupied spaces will occur using plastic and duct tape, including ventilation grills, fixtures and openings.
   - The work area must be unoccupied. Vacating people from adjacent areas is not necessary but is recommended for babies, those that have undergone surgery, immune suppressed people, and those with allergies.
   - Contaminated materials that cannot be cleaned must be removed from the building in a plastic bag. The outside of the bags must be wiped down with a detergent solution or HEPA vacuumed.
   - The contaminated area and decontamination room must be HEPA vacuumed and cleaned with a damp cloth and/or mop with a detergent solution and be visibly clean prior to removal of the isolation barrier.
   - Air monitoring will be conducted prior to removing isolation materials and occupancy of the area.

Air Quality During Renovation and Remodeling

- During renovation and remodeling, the College will develop and implement a work plan to restrict entry of air contaminants into other work areas.
- Advanced notification will be given to employees prior to the work beginning.

Employee Information and Training

- Employees will be trained in the following areas:
  - The proper use and limitations of personal protective equipment
  - The health hazards associated with biological and chemical waste
  - The proper methods to use to remediate a contaminated site
Recordkeeping

- The following records will be maintained:
  - All training records
  - All communications related to the original compliant
  - All notes from the investigation
  - All remediation contractors’ reports including results of air, bulk, or surface sampling that was conducted

Responsibilities

1. Human Resources
   a. Maintain training records
   b. Properly address any ongoing employee IAQ complaints
   c. Receive and maintain documentation of complaint, investigation, results, and response from Director

2. Director of Facilities Management
   a. Properly investigate all IAQ complaints
   b. Act as a liaison with remediation contractors
   c. Follow-up with employee(s) after remediation to communicate what has been done and to address any additional questions
   d. Provide documentation of complaint, investigation, results, and response to Human Resources

3. Director of Learning Services & Disability Services
   a. Properly address any ongoing student IAQ complaints

Evaluation
The Safety Committee shall be responsible for evaluating this policy annually.

Document History
Created: 2/2006