

Sherwood Charter School

Healthy and Safe Schools Plan

Adopted: December 19, 2016

Amended: April 20, 2017

**SHERWOOD CHARTER SCHOOL
BOARD OF DIRECTORS**

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I. Introduction

Each school district, education service district, and public charter school must develop a Healthy and Safe Schools Plan for all buildings owned or leased by the school district or public charter school where students and staff are present on a regular basis.

School districts, education service districts, and public charter schools must submit a preliminary draft of the Healthy and Safe Schools Plan to the Department of Education on or before **October 1, 2016**. School districts, education service districts, and public charter schools must submit the final draft of the Healthy and Safe Schools Plan to the Department of Education on or before **January 1, 2017**.

Sherwood Charter School (SCS) submitted the preliminary draft of its Healthy and Safe Schools plan to the Oregon Department of Education (ODE) on September 30, 2016, and the final draft of its Healthy and Safe Schools plan on December 19, 2016. To ensure compliance with OAR 581-022-2223 (Rule 22), SCS submitted to the ODE this amended Healthy and Safe Schools Plan that includes a forward-looking component in regard to future water testing.

Thereafter, school districts, education service districts, and public charter schools must annually submit an updated Healthy and Safe Schools Plan if new buildings are acquired, constructed, or leased or if the plan is modified by the school district, education service district, or public charter school. Plans should be submitted to the Oregon Department of Education at ODE.schoolfacilities@state.or.us.

The Department of Education, with input from the Oregon Health Authority, provided a model plan to facilitate the creation of Healthy and Safe Schools Plans by school districts, ESDs, and charter schools. Beneath each of the seven required elements in the model plan, information was included in italics to help schools understand plan requirements and easily locate resources for that particular plan component. Sherwood Charter School has chosen to retain the model's italicized content to ensure compliance with each element for current and future school boards as well as to provide the charter school community with an understanding of the purpose of the plan and the actions that the Sherwood Charter School Board of Directors has taken and plans to take to ensure a healthy and safe school environment.

II. Plan Elements

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: Ms. Joy Raboli
Position: Principal
Contact information: 23264 SW Main Street, Sherwood, OR 97140
jraboli@sherwoodcharterschool.org
503.925.8007

2. List of Buildings

OAR 581-022-2223(5)(b) 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.

The Sherwood Charter School's Healthy and Safe Schools Plan covers the following buildings:

Sherwood Charter School leases portions of the main building that is part of the Sherwood Community Friends Church (constructed between 1971 and 1972), located at 23264 SW Main Street, Sherwood, OR 97140, and land adjacent to the main building. On this land, Sherwood Charter School has situated four modular buildings, three of which are owned by Sherwood Charter School (Buildings B, C and D) with the fourth (Building A) being leased from Modern Buildings, PO Box 110, 9493 Porter Road, Aumsville, OR 97325.

3. Radon Testing and Reporting Plan / Testing Results

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. Note: radon measurement plans from school districts were due to OHA on September 1, 2016.

Radon measurement resources for schools:

- *Oregon Health Authority's radon measurement protocol, tools, and plan submission information are located here:
<http://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/RadonGas/Pages/Testing-in-Schools-.aspx>*

In accordance with ORS § 332.167, which requires that school districts (including charter schools) develop a plan to test for elevated levels of radon in schools and submit to the Oregon Health Authority (OHA) by September 1, 2016, and complete initial testing for elevated levels of radon by January 1, 2021, the Sherwood Charter School (SCS) Board of Directors, in cooperation with the SCS Safety Committee, took these important steps to ensure that SCS buildings do not contain elevated levels of radon:

1. On September 1, 2016, SCS submitted its *Radon Testing and Reporting Plan* to OHA.
2. The SCS Board of Directors directed the Safety Committee to proceed with initial testing for radon at its September 29, 2016, meeting.
3. On October 4, 2016, the Safety Committee reviewed the aforementioned step-by-step guide for planning for radon testing at SCS and took the following actions:

SCS is comprised of a single school campus. As noted above, SCS leases space and land from Sherwood Community Friends Church. School classrooms, offices, and support services are located in the main building shared with the church; four additional modular buildings (portables) are located on site for a total of five (5) buildings that are occupied by students and staff. All five buildings were included in the testing plan.

The Safety Committee utilized facility floor plans to plot testing locations and tracked these locations in logs. These floor plans were included in SCS's *Radon Testing and Reporting Plan* to OHA. For the safety of our students, however, these floor plans will not be publicly posted on the SCS website; instead, they are available to parents, faculty and staff in the school office.

The committee identified rooms to be tested. ORS§ 332.166-167 specifies that "at a minimum, any frequently occupied room in contact with the ground or located above a basement or a crawlspace" should be tested. The following 17 rooms were identified for testing: 11 classrooms (K, 1, 2, 3, 4, 5, math, art, science, humanities) and 6 offices/work

spaces (Principal, main school office, copy room, reading specialist/work room, counselor's office, and staff room/back office). Detector kits required: 17.

The number of quality control measurements needed were then determined. Three types of quality assurance measures were conducted to ensure reliable readings: duplicates, blanks, and spikes. These measures are detailed in the linked report.

4. Upon receipt of the radon detector kits from Air Chek, Inc., on October 13, 2016, five (5) detector kits were opened and immediately closed. On the placement logs, these kits are identified as "blanks:" 7136415, 7136416, 7136417, 7136418, and 7136419.
5. Per Air Chek's recommendation, Safety Committee then contacted Bowser-Morner, a spiking company, to determine the spiking schedule and their fees.
6. Bowser-Morner exposed/spiked three (3) of the charcoal devices with radon for 2-3 days for quality assurance; the three (3) detector kits that were spiked with known concentrations of radon are identified on the placement logs as: 7136404, 7136420, and 7136421.
7. Spike kits were received by SCS on October 24, 2016, and coincided with placement of remaining detector kits.
8. Initial short-term testing using activated charcoal adsorption test kits was performed over 70-72 hours beginning October 25, 2016. Placement of test kits followed the protocol outlined in *Testing for Elevated Radon in Oregon Schools*, an OHA publication. Parents and staff were notified by office staff via email on October 25 that testing had begun and notes were hung with devices to ensure devices were not disturbed. Per OHA recommendations and the *SCS Radon Testing and Reporting Plan*, the testing occurred under closed conditions in October to allow time for follow-up, long-term testing beginning in November, if needed. Testing occurred during normal school days when the HVAC system was functioning as usual.
9. Detector kits, blanks, duplicates, and spikes were retrieved and sent via UPS on 10/28/16 and received by Air Chek, Inc. on November 1, 2016.
10. All analysis was completed on November 1, 2016.
11. The results were communicated to the Sherwood Charter School principal and the SCS Safety Committee on November 3, 2016.
12. The Safety Committee met to review the results on November 8, 2016, and to discuss recommendations prior to submission to the SCS Board of Directors.

ACTION LEVEL and RESULTS

In the US, radioactivity is measured in curies. A curie is approximately the amount of radioactivity produced by one gram of radium. A picocurie is one trillionth of a curie. Radiation from radon is expressed in picocuries per liters of air (pCi/L). US EPA has set the action level for radon at 4.0

pCi/L and recommends reducing the concentration of radon in indoor environments to below this action level.

The Safety Committee is pleased to report that all detector kits indicate levels of radon well below the action level for radon in schools. All readings in the main building of SCS fall in the range of 1.0 to 1.5 pCi/L (± 0.3). All readings in the portables range between <0.3 to 0.5. The lab was unable to provide analysis for detector kit# 7136422 due to missing information on the start date. However, because eleven (11) other radon detection devices were deployed in the portables (including two [2] detection kits in an adjoining classroom) and all of those results consistently detected similar, extremely low levels of radon, the Safety Committee feels confident in current test results and does not recommend retesting the fourth-grade classroom.

No further testing needs to be performed at this time, and no mitigation efforts are necessary.

Because the results are less than 2.0 pCi/L, SCS will test again every 10 years (as required by ORS §332.166-167); **radon testing will again be conducted in October 2026.**

COMMUNICATION OF RESULTS TO SCS COMMUNITY

Following Safety Committee review of radon test results on Tuesday, November 8, 2016, the results were emailed to the board. The final report of the Safety Committee was presented to the SCS school board at its regularly scheduled meeting on November 16, 2016.

Results of these initial tests were emailed to parents, faculty and staff on November 10, 2016, and posted to the SCS website on November 17, 2016. Results (in hardcopy) were made readily available to parents, guardians, students, school employees, school volunteers, administrators and community representatives at the school's office and on the SCS website as required by law.

On December 6, 2016, a copy of this report was provided to OHA and the Sherwood School District, with whom we have entered into our charter agreement, following approval of the final report at the Sherwood Charter School Board of Directors Meeting. The SCS Board of Directors then provided the testing results to the Sherwood Community Friends Church, from whom it leases space and land, as a professional courtesy.

Sherwood Charter School is committed to providing a safe environment for students and staff, and the swift completion of radon testing in its facility, five years ahead of the required deadline, demonstrates that commitment.

*Community members can access Sherwood Charter School's Radon Testing and Reporting Plan here: http://sherwoodcharterschool.org/wp-content/uploads/SCS-Radon-Testing-and-Reporting-Plan_090116-Signed.pdf

*Community members can access the 2016 Radon Test Results report here: <http://sherwoodcharterschool.org/wp-content/uploads/2016-Radon-Testing-Results-with-Appendix-Website.pdf>

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.

In developing a plan to test for and reduce exposure to lead in water used for drinking or food preparation, the following components are recommended by the Oregon Department of Education and the Oregon Health Authority:

- 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.*

Sherwood Charter School (SCS) is committed to testing for and reducing exposure to lead in drinking water in our facilities, both owned and leased. At the October 20, 2016, meeting of the SCS Board of Directors, sources of lead and lead's health effects were discussed. Directors agreed that water testing is a key, first step in evaluating the plumbing and determining if a lead problem exists. Per recommendations by the Oregon Department of Education and the Oregon Health Authority, SCS decided to test for lead in all water outlets used for drinking or food preparation. Drinking water outlets are locations where water may be used for consumption, such as water fountains, faucets, or taps. This initial planning and testing responsibility was entrusted to the SCS Safety Committee.

The Safety Committee obtained a list of Oregon Environmental Laboratory Accreditation Program labs (ORELAP). They contacted three certified laboratories for comparison, presented these options to the board, and recommended Alexin Analytical, Inc., the lab that the City of Sherwood uses for its testing. After comparing lab locations, process, pricing, and turnaround times for analysis, the Board accepted the Safety Committee recommendation. Alexin Analytical, Inc., was used for all testing.

Next, water outlets used for drinking and food preparation were prioritized and identified in the main building leased from SCFC. Restroom taps, therefore, were excluded from sample collection and testing in the main building because alternative sources of drinking water are readily available to students (i.e. drinking fountains). As an added precaution, however, laminated, age-appropriate placards were posted in each of the main building restrooms above untested taps advising students, faculty and staff not to drink untested tap water.

Each of SCS's four, modular/portable buildings houses two classrooms; each classroom has its own restroom. It was determined that all restroom faucets in the modular/portable buildings (labeled A, B, C and D) should be included in lead testing. For students and faculty in Portables B, C and D, the restroom sink is the only available option for drinking water. Although additional drinking fountains are available in Portable A, which includes the Art and Science classrooms, drinking cups have always been provided in restrooms for drinking by children and faculty. These restrooms, then, were also prioritized as outlets for human consumption. Because all faucets are used for drinking water, all taps were tested for lead.

On Tuesday, November 22, 2016, initial, first-draw water samples were collected from the following locations in the main building: kitchen sinks (right and left); and upstairs and downstairs drinking fountains. To be thorough, an additional water sample was collected and submitted to Alexin Analytical on November 30, 2016, from a bottled water dispenser in the back office as lead can potentially be present in the dispenser valve and fittings incorporated in the outlet of the unit. Therefore, a total of 5 water samples were collected from the main building.

Initial, first-draw water samples were also collected from the six drinking faucets in the 2nd, 3rd, 4th, 5th, math, and humanities classrooms (the restrooms of Portables A, B and C described above). Two additional samples were collected from the science classroom sink in Portable A, which has both a faucet and drinking fountain. Three additional samples were collected from the two art classroom sinks, which include two faucets and a drinking fountain. A total of 13 water samples, therefore, were collected from the portable buildings, including the art and science classroom restrooms as noted above.

SCS followed the Environmental Protection Agency's "3 T's for Reducing Lead in Drinking Water for Schools, Revised Technical Guidance" to ensure that samples for lead were collected properly. The EPA recommends that schools collect 250 mL first-draw samples (i.e. samples of stagnant water before any flushing or use occurs) from water fountains and other outlets used for consumption. This sampling protocol maximizes the likelihood that the highest concentrations of lead are found because the first 250 mL are analyzed for lead after overnight stagnation. According to the 3Ts publication, the sample was designed to pinpoint specific outlets that require remediation (e.g. drinking fountain or faucet replacement).

Water samples were collected and submitted to Alexin Analytical, Inc., on November 22, 2016.

APRIL 2017 UPDATE:

Alexin Analytical delivered the initial lead testing results to SCS Principal Joy Raboli on January 4, 2017. On January 5, 2017, the SCS Safety Committee met to review the Analysis Report and discuss recommendations to be presented to SCS Board of Directors.

On January 5, 2017, a joint meeting of the Sherwood Charter School and Sherwood Community Friends Church boards was held to discuss the lead testing results and determine next steps. An effective program to reduce lead in drinking water will require a team effort between landlord and tenant.

Per the Analysis Report, of the 18 water outlets sampled, **16 outlets indicated that no lead was detected (ND)** at the minimum reporting level (MRL).

One outlet (3rd grade restroom) reported a result of 2.6, well below the EPA's maximum contamination limit (MCL) of 20 ppb. However, because this finding was inconsistent with the results of the 12 other outlets tested in the portable buildings, it was retested in February for comparison to the initial test. On March 3, 2017, SCS received the results of that testing, and the follow-up analysis showed **no detectable levels of lead (ND)** in that third-grade restroom.

The downstairs drinking fountain in the main building yielded results of 10.4 ppb, again, below the level that the EPA has deemed remediation necessary. However, out of an abundance of caution and in cooperation with school efforts to reduce exposure to lead in drinking water, the Sherwood Community Friends Church decided to replace the unit. This unit was decommissioned prior to students returning to school on Monday, January 9, and replaced later that month. Follow-up analysis of a water sample taken from the new drinking fountain also indicated **no detectable levels of lead (ND)**.

*Community members can access Sherwood Charter School's Lead Testing and Reporting Plan here: <http://sherwoodcharterschool.org/wp-content/uploads/UPDATED-2017-Lead-in-Drinking-Water-Testing-Plan-and-Results-Final.pdf>

On April 20, 2017, the SCS Healthy and Safe Schools plan was amended by the Sherwood Charter School Board of Directors to include a future testing schedule.

To guide this decision, in the absence of definitive guidelines on how often to re-test for lead in drinking water, the board considered what would be a prudent testing interval based on the following:

- Results of initial and follow-up water testing which indicated no fixtures need to be monitored;
- Consultation with the testing laboratory, Alexin Analytical, Inc.;
- Consultation with the Coordinator of Drinking Water Programs for public water systems in Oregon at the Environmental Protection Agency (EPA);
- City of Sherwood Water Quality reports, the source of SCS's water supply, indicating no concerns for either lead or copper in drinking water.

The SCS Board of Directors agreed as follows:

1. All testing will be done on the same testing schedule for the sake of convenience to both the SCS and SCFC communities;
2. SCS will continue to use the same laboratory, Alexin Analytics, Inc., for testing, if possible;
3. SCS will retest all fixtures used for drinking or food preparation in the main building leased from SCFC every five (5) years for both lead and copper;
4. SCS will retest all fixtures used for drinking or food preparation in the portables owned or leased by the school as well as all restroom fixtures for both lead and copper;
5. If SCS were to move its facility to a location where water analysis for lead has not been conducted within the past five years, or if SCS were to add a portable building, water samples will be collected and analyzed and fixtures will be remediated as necessary.

Thus, **retesting as stated above will be conducted in January 2022.**

If new legislation or guidelines for retesting intervals emerge, SCS will modify this plan as necessary. In the meantime, this interval will be communicated to the Sherwood Charter School community on Thursday, April 27, 2017, via email, and an updated report will be posted to the SCS website.

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.*

If lead levels are found to be elevated, an appropriate response will be designed and corrective action will be taken to replace the sources of lead in building plumbing. Sherwood Charter School will prevent access to water taps that have more than 20 parts per billion (ppb) of lead by shutting off taps, covering water fountains, and making bottled water accessible 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.*

All results from tests for lead in water, as well as mitigation efforts, will be made available to students, families, faculty, staff, and the community as quickly as possible and within five (5) business days of receipt. Information about monitoring programs, potential risks, the results of testing, and remediation efforts will be communicated via email to the school community, posted on the charter school website, and made available in hardcopy in the school office.

SCS received the initial lead testing results on January 4, 2017. These results and mitigation efforts were disseminated to the SCS community as indicated above and as required by law.

A copy of this report was also provided to the Oregon Health Authority, the Sherwood School District (who sponsors our charter agreement), and the Sherwood Community Friends Church on January 9, 2017.

Following receipt of the follow-up analysis for the third-grade classroom and new drinking fountain on March 6, 2017, SCS apprised the community of results on March 9, 2017.

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

The EPA's 3Ts technical guidance is available here:

https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf

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" be certified to follow lead-safe work practices. "Child-occupied facilities" is defined in OAR 333-070-0085.

For more information on the Renovation, Repair and Painting Program Rule, visit the following website: <https://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/LeadPoisoning/ChildCareSchools/Pages/RulesforRenovating.aspx>

Sherwood Charter School is committed to reducing exposure to lead paint in its facilities. In the portion of the main building that is part of the Sherwood Community Friends Church, a structure built between 1971-1972, SCS will work cooperatively with its landlord to comply with the United States Environmental Protection Agency's Renovation, Repair and Painting Program Rule.

Sherwood Charter School understands that individuals may paint over existing surfaces in the main building as long as surfaces are not disturbed by sanding or pressure washing during the process. For renovation,

repair, and painting projects requiring significant disturbance of surfaces, SCS and Sherwood Community Friends Church will only contract with certified lead based paint renovation contractors licensed by the Oregon Construction Contractors Board or will ensure that individuals are certified by the Oregon Health Authority to perform the work to comply with this federal law. In addition, Sherwood Charter School, will determine if the main building of the Sherwood Community Friends Church has already been inspected to determine and assess risk.

The Renovation, Repair and Painting Program Rule does not apply to post-1978 child-occupied facilities; therefore, this rule does not apply to modular buildings currently owned by Sherwood Charter School or leased by SCS from lessor, Modern Buildings.

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.

Sherwood Charter School has adopted an integrated pest management plan as required by ORS 634.700 through 634.750. SCS modified the “Model Integrated Pest Management Plan for Small Oregon School Districts,” (a model plan intended for use in school districts with three or fewer schools created by the Oregon State University School IPM Program) to this end.

*Community members can access the Sherwood Charter School IPM plan here:

<http://sherwoodcharterschool.org/wp-content/uploads/SCS-IPM-Plan.pdf>

*The “Low-Impact List from Oregon State University” is available here:

<http://sherwoodcharterschool.org/wp-content/uploads/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 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.*

The Sherwood Charter School will make all test results and detailed information explaining the test results available to the public within five (5) business days of receiving the results of radon testing and lead testing. SCS will post the results on the charter school website, send notice of the results over the email system, and make the results available in hardcopy in the school office.

III. Conclusion – Future Actions

Sherwood Charter School will annually submit an updated Healthy and Safe Schools Plan if new buildings are acquired, constructed, or leased or if the plan is modified by the charter school.

The school will retest for lead and copper, as outlined above, in January 2022.

The school will again conduct radon testing in October 2026.

* These reports will be available for ten (10) years. If included links are inactive, please visit our school website at www.sherwoodcharterschool.org.