Detroit Public Schools

Comprehensive Environmental Health and Safety Plan

Plan and Strategy for Implementation

July 2002

Prepared By
Detroit Public Schools
Division of Chief Operating Officer
Department of Environmental Health and Safety

Revised June 2003
COMPREHENSIVE ENVIRONMENTAL HEALTH AND SAFETY PLAN

Preface

The strategy for the development of the Comprehensive Environmental Health and Safety Plan will be to provide an outline of environmental concerns that may affect the health of building occupants within Detroit Public Schools.

This plan has been separated into a total of thirteen sections. These sections, as previously listed, range from specific environmental issues such as Asbestos and lead, to general environmental topics, such as Indoor Air Quality and Hazardous Chemicals and Materials.

The intent of this delineation is based upon the following factors:

- The information presented in the outline is sectioned in order of plan development.

- Certain environmental issues, such as Asbestos, have school district specific regulations or guidelines that must be followed. Therefore, the Comprehensive Environmental Health and Safety Plan will address these concerns in more detail.

- The various Federal and State governmental agencies have regulations and guidelines that are topical in nature. For instance, the Michigan Right-To-Know law encompasses all hazardous chemicals that an employee may come in contact with. Another example is Indoor Air Quality (IAQ). The Environmental Protection Agency incorporates many different environmental issues under the general heading of IAQ.

- Each environmental issue has a different level or degree of exposure potential for building occupants. As a result, the resources of the Department of Environmental Health and Safety will be directed toward the highest risk environmental problems. The Comprehensive Environmental Health and Safety Plan will reflect the environmental issues of most concern in its detail.

- By addressing the various environmental issues in this format, the Comprehensive Environmental Health and Safety Plan Manual will be a user-friendly document that can be read and understood by members of the staff and community.

The Comprehensive Environmental Health and Safety Plan Manual, when developed in its entirety, will refer the user to various written environmental programs outside of the manual itself. This will allow the Plan Manual to be used as a guidance document identifying Detroit Public School’s policies on the various environmental issues.
VISION

The vision of the Comprehensive Environmental Health & Safety Plan is to provide a learning and working environment in all facilities operated by DPS, which consistently meets or exceeds all environmental requirements.

MISSION

The mission of the Comprehensive Environmental Health & Safety Plan is to evolve into a model plan in which environmental concerns are identified, responded to and mitigated within a timely fashion. This proactive management of potential environmental concerns within our facilities will in turn promote a healthier and safer environment for our students, staff and community.

GOAL

The goal of the Detroit Public School’s Comprehensive Environmental Health & Safety Plan will be to provide full written policies and guidelines, in accordance with applicable regulatory and industry standards, for all environmentally related issues within our school district.

Based on final review and approval by the Chief Executive Officer, copies of this document will be made available upon request. Revisions of the document content may occur every five years based on a full committee review.
Comprehensive Environmental Health & Safety Plan
Plan Section Topics
In order of priority development

- Section I  Asbestos
- Section II  Indoor Air Quality
- Section III  Lead
- Section IV  Mercury
- Section V  Arsenic
- Section VI  Polychlorinated Biphenyls (PCB)
- Section VII  Hazardous Chemicals & Materials
- Section VIII  Aviary Concerns/Droppings
- Section IX  Environmental Site Assessments
- Section X  Radon
- Section XI  Electrical Magnetic Fields
- Section XII  Water Quality
- Section XIII  Integrated Pest Management
SECTION I

1. Asbestos
   a. Education/Training
      1. Trades/Custodial/Maintenance/Engineering Staffs
      2. Principals/Building Administrators
      3. Key EHS Staff
      4. Staff/Community
   b. Documentation/Record keeping
      1. Six Month Periodic Surveillances
      2. Three Year Reinspection
      3. Annual Notifications
      4. Asbestos Abatement Activities
      5. Contracted Response Team
      6. Education/Training Documentation
   c. Outsourced Firms
      1. Licensed Asbestos Abatement Contractors
      2. Contracted Response Team Members
      3. Consulting/Air Monitoring Firms
      4. Bond Planning Consortium
      5. Outside Contractor Notification
   d. Central File
      1. AHERA Inspections
      2. Management Plans
      3. Asbestos Abatement/O & M Activities
      4. AHERA/OSHA Record keeping

SECTION II

2. Indoor Air Quality (IAQ)
   a. Education/Training
      1. Trades/Custodial/Maintenance/Engineering Staffs
      2. Principals/Building Administrators
      3. Key EHS Staff
      4. Staff/Community
   b. Program Development
      1. Facility Evaluation
      2. Role and Functions of Key Personnel
      3. Effective Communication
         1. Developing Complainant System
2. Responding to Complaints
3. Implementation of Preventative Measures
4. Renovation/Construction Issues

c. Reference Information
   1. EPA’s IAQ Tool For Schools Publication
   2. Periodic Evaluation of new data

SECTION III

3. Lead

   a. Education/Training
      1. Trades/Custodial/Maintenance/Engineering Staffs
      2. Key EHS Staff
      3. Staff/Community
   
   b. Lead O & M Program
      1. Facility Evaluation
         1. Kindergartens/First Grade Classrooms
         2. Child Care Locations
         3. Playgrounds
      2. Renovation/Construction Areas
         1. Contractor Notification
         2. Contractor Compliance
         3. Containment
         4. Clearance Testing
      3. Reference Information
         1. OSHA Lead Construction Standard
         2. Michigan State Regulations

SECTION IV

4. Mercury

   a. Mercury Control and Reduction Plan
      1. Education/Training
      2. Mercury Identification and Inventory
      3. Mercury Reduction Program
      4. Mercury Emergency Spill Action Plan
      5. Mercury Disposal Plan

SECTION V

5. Arsenic
a. Existing Treated Wood Products (i.e. Play Structures)
   1. Arsenic Content Evaluation
      1. Manufacturer Documentation
      2. Component Testing
   2. Worker Practices
      1. Training
         a. Hazards
         b. Proper Personal Protective Equipment
         c. Handling Procedures
      2. Sealing/Encapsulation
         a. Proper Coating Procedures
   3. Child Exposure Evaluation
      1. Risk Assessment
      2. Use Restriction Criteria
b. Future Treated Wood Product Purchases
   1. Arsenic Restriction Policy
   2. Manufacturer Documentation

c. Additional Sources of Potential Arsenic Exposure
   1. Arsenic in Soil
   2. Arsenic in Drinking Water
   3. Pesticides/Weed Killers

SECTION VI

6. Polychlorinated Biphenyls (PCB)

   a. PCB Control and Reduction Plan
      1. Education/Training
      2. PCB Identification and Inventory
      3. PCB Reduction Program
      4. PCB Emergency Spill Action Plan
      5. PCB Disposal Plan

SECTION VII

7. Hazardous Chemicals & Materials

   a. Michigan Right To Know (Section VIII)
      1. Addresses All Work Site Hazardous Chemicals
2. Material Safety Data Sheets (MSDSs)
3. Employee Information & Training
b. Comprehensive Hazardous Chemical Program
   1. Science/Special Use Classrooms
   2. Custodial/Maintenance Areas
   3. Warehouse Materials and Ordering Restrictions
   4. Facilities/Trades Materials
c. Chemical Storage/Disposal
   1. Policy on Chemical Storage
   2. Policy on Chemical Disposal
   3. In-House vs. Outside Contractor
d. Regulatory Compliance
   1. Hazardous Waste Generator Number(s)
   2. Document Maintenance

SECTION VIII

8. Aviary Concerns/Droppings
   a. Detection
      1. Evaluation of Non-Occupied Spaces for Dropping Evidence
      2. Notification to EHS
   b. Remediation
      1. In-House vs. Outside Contractor
      2. Procedures
      3. Personal Protective Equipment
      4. Documentation
   c. Preventative Measures
      1. Security of Facility Openings
         1. Facilities Maintenance vs. Outsider Contractor

SECTION IX

9. Environmental Site Assessments (ESAs)
   a. Existing Sites
      1. Required Components
      2. Phase I, Phase 2, Phase 3 ESAs When Necessary
      3. Document Maintenance
   b. Site Purchases
      4. Required Components
      5. Policy of ESA Recommendation Adherence

SECTION X

10. Radon
a. Radon Control Program
   1. Identification and Inventory
   2. Radon Reduction Program
      1. Education/Training
      2. In-House vs. Outside Contractor
      3. Preventative Measures in New Construction

SECTION XI

9. Electrical Magnetic Fields

a. Existing Buildings
   1. Baseline Evaluations
b. Remodeling Activities
   1. Evaluation of Electrical Magnetic Fields
   2. Placement Consideration of Electrical Component
c. New Construction
   1. Evaluation of Electrical Magnetic Fields
   2. Placement Consideration of Electrical Component
d. Site Purchases
   1. Electrical Consideration during ESAs
e. Reference Information
   1. EPA Publication #402-R-92-008
   2. Periodic Evaluation of new data

SECTION XII

10. Water Quality

a. Water Testing
   1. Periodic Testing of Non-Transient Non-Community Water Supplies (if Applicable)
   2. Develop Complainant Process/Forms
   3. Water Testing Subsequent to Renovation or Construction
b. Additional Resources
   1. Safe Drinking Water

SECTION XIII

13. Integrated Pest Management (IPM)

a. IPM Program
   1. Pest Management Roles
   2. Setting Pest Management Objectives for Sites
3. Inspection, Identification, Monitoring
4. Setting Action Thresholds
5. Implementation of IPM Strategies
6. Evaluation of Results & Record keeping

b. Additional Factors
   1. Outside Contractor Involvement
      Facilities Department Involvement
STRATEGIC PLAN FOR THE DEVELOPMENT OF A 
COMPREHENSIVE ENVIRONMENTAL HEALTH AND SAFETY

Section III

Comprehensive Environmental Health & Safety Plan
Program Section Topics:  *(in order of priority development)*

- Section I  Asbestos
- Section II  Indoor air Quality
- Section III  Lead
- Section IV  Mercury
- Section V  Arsenic
- Section VI  Polychlorinated Biphenyls (PCB)
- Section VII  Hazardous Chemicals & Materials
- Section VIII  Aviary Concerns/Droppings
- Section IX  Environmental Site Assessments
- Section X  Radon
- Section XI  Electric Magnetic Fields
- Section XII  Water Quality
- Section XIII  Integrated Pest Management
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

Section I
Asbestos Management Program

The management and exposure prevention of asbestos containing materials for employees and building occupants is regulated by both the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). OSHA concludes that asbestos is a know carcinogen and must be treated appropriately. Upon this conclusion, the EPA has promulgated specific directives for school buildings. Therefore, Detroit Public Schools employs all policies and procedures within the Strategic Implementation Plan for ACM to meet or exceed the regulatory provisions set forth by all regulatory bodies. Thus, ensuring that the maintenance, removal and management of asbestos containing materials does not pose a threat to the general public and the occupants of school buildings within the DPS district.

1. Asbestos Program Development Outline
   A. Education/Training
      1. Trades/Custodial/Maintenance/Engineering Staffs
      2. Principals/Building Administrators
      3. Key EHS Staff
      4. Staff/Community
   B. Documentation/Record keeping
      1. Six Month Periodic Surveillances
      2. Three Year Reinspection
      3. Annual Notifications
      4. Asbestos Abatement Activities
      5. Contracted Response Team
      6. Education/Training Documentation
   C. Outsourced Firms
      1. Licensed Asbestos Abatement Contractors
      2. Contracted Response Team Members
      3. Consulting/Air Monitoring Firms
      4. Bond Planning Consortium
      5. Outside Contractor Notification
   D. Central File
      1. AHERA Inspections
      2. Management Plans
      3. Asbestos Abatement/O & M Activities
      4. AHERA/OSHA Recordkeeping

The comprehensive procedures outlined within the Strategic Implementation Plan for ACM are comprised of a minimum of eight complex regulatory statues that govern asbestos abatement activities within School Districts in the State of Michigan. The asbestos program has been developed to maintain regulatory compliance with all aspects of asbestos within DPS while ensuring simplicity for purposes of implementation.

Development Time Parameters: The Asbestos Management Plan is complete.
SECTION II

Indoor Air Quality Program

The ability to maintain good Indoor Air Quality for employees and community members who visit buildings belonging to DPS is facilitated by the implementation of an IAQ Management Plan. This policy allows DPS to identify/manage/remove unwanted indoor air pollutants, which may contribute to sick building syndrome. In addition, this policy employs proactive prevention techniques, which are utilized to provide a continuous environment free of indoor air pollutants. This policy also incorporates a response process to IAQ concerns.

2. Indoor Air Quality (IAQ) Program Development Outline
   A. Education/Training
      1. Trades/Custodial/Maintenance/Engineering Staffs
      2. Principals/Building Administrators
      3. Key EHS Staff
      4. Staff/Community
   B. Program Development
      1. Facility Evaluation
      2. Role and Functions of Key Personnel
      3. Effective Communication
         a. Developing Complainant System
         b. Responding to Complaints
         c. Implementation of Preventative Measures
      4. Renovation/Construction Issues
   C. Reference Information
      1. EPA’s IAQ Tool for Schools Publication
      2. Periodic Evaluation of new data

The emphasis put on indoor air quality has risen to an all time high due to public perception and employee health issues. This has prompted facility owners to maintain a level of acceptable indoor air status to prevent the sick building syndrome and building related illness. The number of possible contaminants for indoor air problems is limitless and in addition encompasses housekeeping and the engineering aspect of air movement throughout the building. These two components, contaminants and air movement, constitute the majority of resource allocation. Interdepartmental cooperation within DPS is a key step in ensuring that IAQ issues are addressed in an effective and efficient manner. The development of a comprehensive IAQ Program will be time consuming and entail complex procedural development.

Development Time Parameters: A draft of the IAQ Program is complete.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

SECTION III

Lead Program

DPS recognizes the hazards associated with exposure to lead particulates and implements contractor requirements and engineering controls to prevent unnecessary releases of lead into the environment. This policy outlines the environmental testing protocol and technical contractor specification concerning lead when renovation/demolition activities will disturb lead based paint. The institution of this policy allows for clearance monitoring and employee medical monitoring if deemed necessary by EHS or required by a regulating agency.

3. Lead Program Development Outline

A. Education/Training
   1. Trades/Custodial/Maintenance/Engineering Staffs
   2. Key EHS Staff
   3. Staff/Community

B. Lead O & M Program
   1. Facility Evaluation
      a. Kindergartens/First Grade Classrooms
      b. Child Care Locations
      c. Playgrounds
   2. Renovation/Construction Areas
      a. Contractor Notification
      b. Contractor Compliance
      c. Containment
      d. Clearance Testing
   3. Reference Information
      a. OSHA Lead Construction Standard
      b. Michigan State Regulations

The issue of lead has become a growing concern due to the health effects posed by exposure to this contaminant. Additional concern to child exposure has caused federal and state laws to be adopted in an effort to protect children from lead induced diseases. Thus, lead abatement and lead renovation activities coincide with similar procedures, engineering controls and scrutiny as asbestos activities. DPS recognizes that lead-based paint exist throughout the district and shall implement procedures for staff, contractors, and community members to adhere to while visiting/working in buildings owned or leased by DPS.

Development Time Parameters: Lead Management Program is complete.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

SECTION IV

Mercury Control Program

It is the policy and intent of DPS to protect students and staff from exposure to mercury. DPS recognizes the need to remove mercury devices from the school district and shall employ necessary actions to achieve a “Mercury Free” environment. Until such time, all accidental spills of mercury shall be cleaned by a professional hazardous spill response team. This team shall be contracted by the school system on an as needed basis. Refer to Hazardous Chemicals and Materials Policy.

4. Mercury Program Development Outline

A. Mercury Control and Reduction Plan
   1. Education/Training
   2. Mercury Identification and Inventory
   3. Mercury Reduction Program
   4. Mercury Emergency Spill Action Plan
   5. Mercury Disposal Plan

The identification of mercury sources within the DPS district will constitute a substantial amount of time associated with this program. While an initiative has been issued by regulatory bodies, the proactive implementation of this program will benefit DPS in the coming years. The collection, staging and disposal/recycling procedures shall be intended to streamline the process toward a “Mercury Free” environment.

Development Time Parameters: The Mercury Control Program is complete.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

Section V
Arsenic Program

Based on available scientific evidence, the Occupational Safety and Health Administration (OSHA) concludes that humans exposed to elemental arsenic and to inorganic compounds containing trivalent and pentavalent arsenic have an increased risk of developing cancer. Therefore, because of wood construction material and playground equipment and in accordance with OSHA policy of limiting employee exposures to carcinogens to the lowest level generally feasible, a new, more protective standard for occupational and community exposure to the aforementioned chemicals has been promulgated. The purpose of this directive is to provide guidelines and establish uniform inspection and documentation criteria and compliance procedures for the exposure to arsenic and arsenic-containing, inorganic compounds.

5. Arsenic Program Development Outline

A. Existing Treated Wood Products (i.e. Play Structures)
   7. Arsenic Content Evaluation
      a. Manufacturer Documentation
      b. Component Testing
   8. Worker Practices
      a. Training
         1. Hazards
         2. Proper Personal Protective Equipment
         3. Handling Procedures
      b. Sealing/Encapsulation
         1. Proper Coating Procedures
   9. Child Exposure Evaluation
      a. Risk Assessment
      b. Use Restriction Criteria

B. Future Treated Wood Product Purchases
   1. Arsenic Restriction Policy
   2. Manufacturer Documentation

C. Additional Sources of Potential Arsenic Exposure
   1. Arsenic in Soil
   2. Arsenic in Drinking Water
   3. Pesticides/Weed Killers

The operational aspect of the arsenic program will encompass departments such as purchasing to validate arsenic free product purchases and maintenance to restrict access to equipment during curing processes. Documentation of activities shall be disseminated based upon exposure potential. Disclosure procedure to the public will be on an as needed basis prompted by recommendations from EHS.

Development Time Parameters: The Arsenic Program is complete.
Section VI
Polychlorinated Biphenyls (PCB) Program

PCB’s exist in some electrical equipment. One such piece of equipment is the ballast for electrical fluorescent lighting. This policy, incorporated into the Hazardous Chemicals and Materials section, outlines handling/removal/recycling and clean up procedures relating to PCB’s.

6. Polychlorinated Biphenyls (PCB) Program Development Outline

A. PCB Control and Reduction Plan
   1. Education/Training
   2. PCB Identification and Inventory
   3. PCB Reduction Program
   4. PCB Emergency Spill Action Plan
   5. PCB Disposal Plan

PCB’s cause a serious health risk and must be handled properly. The majority of the PCB’s within DPS facilities can be found in the ballast of lighting fixtures. The maintenance department shall have outlined procedures relevant to the identification of PCB ballast and the proper removal/disposal process. EHS shall institute a recycling protocol for final removal from site. The intent of this policy is to remove all PCB ballast from the district in an efficient and timely fashion. The program will also include emergency spill containment procedures.

Development Time Parameters: The PCB Program is complete.
SECTION VII

Hazardous Chemicals & Materials Program

It is the policy of DPS to provide information to employees on hazardous and potential hazardous chemicals through the Michigan Right-to-Know program. In the event of a spill or accidental release of said chemicals employees of DPS shall isolate the affected area and prevent entry by students, staff and community members. In respect to health and safety this shall be the only responsibilities of DPS employees. After isolation and restriction have been facilitated, notification to the Department of Environmental Health and Safety (EHS) shall be administered. The EHS representative shall investigate the conditions of the affected area in regards to the safe and appropriate clean-up activities warranted. If a health hazard is identified with the clean-up procedure, then a hazardous materials response team shall be contacted to remediate the affected area. Therefore, it is the policy of DPS that employees are **not** to engage in the clean up of a hazardous material spill.

7. Hazardous Chemicals & Materials Program Development Outline

   A. Michigan Right To Know
      1. Addresses All Work Site Hazardous Chemicals
      2. Material Safety Data Sheets (MSDSSs)
      3. Employee Information & Training

   B. Comprehensive Hazardous Chemical Program
      1. Science/Special Use Classrooms
      2. Custodial/Maintenance Areas
      3. Warehouse Materials and Ordering Restrictions
      4. Facilities/Trades Materials

   C. Chemical Storage/Disposal
      1. Policy on Chemical Storage
      2. Policy on Chemical Disposal
         a. In-House vs. Outside Contractor

   D. Regulatory Compliance
      1. Hazardous Waste Generator Number(s)
      2. Document Maintenance
The compilation of hazardous materials and chemicals throughout the district pose a health issue and increased risk of unnecessary release of chemicals. Instructional use and maintenance/custodial use of chemicals shall be categorized and quantified for documentation purposes. Procedures shall be implemented to remove/dispose/recycle of any outdated chemicals. Training on proper handling and response to spills shall be incorporated into the program by use of the Michigan Right to Know Act. Documentation of current Material Safety Data Sheets shall be maintained for compliance issues. Interdepartmental cooperation will play a big effort in instituting this program because procurement and EHS shall oversee the future compliance of this program.

**Development Time Parameters:** The time parameter for the development of the Hazardous Materials Program is approximately 1 month.
Section VIII

Aviary Concerns/Droppings Program

The infestation of aviary pest into buildings owned or leased by DPS causes the potential exposure to bacterial infection, which is communicable by animals to humans. Since human infection usually occurs by direct contact with, or receiving a bite from, an infected bird or indirectly by inhaling dust from the feathers or excrement of birds, proper ventilation and personal protective equipment such as gloves, goggles, and/or respirators may be required as appropriate. Abatement methods for the hazard of psittacosis and other communicable diseases relative to this section include educating employees to the potential hazard, preventative measures against aviary access/infestation within district buildings, adhering to general rules of work and personal hygiene, and instituting an occupational medical monitoring program for those that are applicable.

8. Aviary Concerns/Droppings Program Development Outline

A. Detection
   1. Evaluation of Non-Occupied Spaces for Dropping Evidence
   2. Notification to EHS

B. Remediation
   1. In-House vs. Outside Contractor
   2. Procedures
   3. Personal Protective Equipment
   4. Documentation

C. Preventative Measures
   1. Security of Facility Openings
      a. Facilities Maintenance vs. Outsider Contractor

This program operates as a proactive and reactive approach to the infestation of unwanted Aviary pests. The engineering controls implemented shall help prevent the infestation once areas are identified as possible entry points. Maintenance department shall maintain a list of areas where infestation has occurred and where breaches in the engineering controls have failed.

Development Time Parameters: The Aviary Control Program is complete.
SECTION IX

Environmental Site Assessments Program

A Phase I ESA determines, for a parcel of real estate, the "recognized environmental conditions." That is, the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of the substance(s) into structures on the property, or into the ground, groundwater, or surface water of the property. This procedure shall be instituted for all land purchases for DPS. In by doing so, the potential for Comprehensive Environmental Compensation Liability Act (CERCLA) liability is greatly reduced and helps to ensure that the property is considered environmentally safe. If a recognized environmental condition exist DPS reserves the right to initiate a Baseline Environmental Assessment, Phase II (monitoring and sampling) or Phase III remediation activities under American Society for Testing and Materials (ASTM) standards.

9. Environmental Site Assessment (ESA) Program Development Outline

A. Existing Sites
   1. Required Components
   2. Phase I, Phase 2, Phase 3 ESAs When Necessary
   3. Document Maintenance

B. Site Purchases
   1. Required Components
   2. Policy of ESA Recommendation Adherence

The potential CERCLA liability and requirements set forth by loan institutions prompted the necessity for a clear cut policy when purchasing new or refinancing property owned by DPS. This policy outlines in detail the options for DPS when procuring property or financial collateral. This procedure shall help prevent future liability and ensure that property utilized by DPS is safe for occupants.

Development Time Parameters: The time parameter for the development of an ESA Program is approximately 3-4 months.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

SECTION X

Radon Program

Although radon is naturally occurring, DPS provides information and training to the staff and community on radon exposure. Included in this information is the disclosure of sampling information and preventative exposure control methods employed by DPS. This includes corrective action procedures for custodial staff and new construction requirements. DPS shall prevent overexposure to radon by ensuring that these procedures are followed and proper building maintenance/construction is being achieved.

10. Radon Program Development Outline

   A. Radon Control Program
      1. Identification and Inventory
      2. Radon Reduction Program
         a. Education/Training
         b. In-House vs. Outside Contractor
      3. Preventative Measures in New Construction

Radon issues may arise during renovation and demolition activities. Hence, training and proper preventative maintenance procedures shall be implemented to control the exposure to radon. These procedures are simplistic and can be incorporated into other training seminars. Testing protocols are stipulated on an as need basis.

Development Time Parameters: The Radon Control Program is complete.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A
COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

SECTION XI

Electric Magnetic Fields Program
The exposure to Electrical Magnetic Field (EMF) within DPS buildings is limited to office appliances and some electric power producing equipment such as but not limited to overhead power lines. These exposures can be controlled by the implementation of training for workers and community members subjected to EMFs. DPS voluntarily initiates procedures and protocols for individuals working with equipment that produces EMFs.

11. Electrical Magnetic Fields Program Development Outline

A. Existing Buildings
   1. Baseline Evaluations
B. Remodeling Activities
   1. Evaluation of Electrical Magnetic Fields
   2. Placement Consideration of Electrical Component
C. New Construction
   1. Evaluation of Electrical Magnetic Fields
   2. Placement Consideration of Electrical Components
D. Site Purchases
   1. Electrical Consideration during ESAs
E. Reference Information
   1. EPA Publication #402-R-92-008
   2. Periodic Evaluation of new data

Areas of elevated electric magnetic fields shall be identified throughout the district. All potential hot spots shall be listed as priority areas where access will be limited, if feasible. Current best industry practices shall be implemented to prevent overexposure.

Development Time Parameters: The EMF Program is complete.
STRATEGIC PLAN FOR THE DEVELOPMENT OF A COMPREHENSIVE ENVIRONMENTAL HEALTH & SAFETY PLAN

SECTION XII

Water Quality Program

DPS shall institute a water testing protocol for all renovation or new construction activities that may affect the potable water system. Analytical water testing results that pass all applicable water standards shall act as clearance samples for releasing the water supply back to the perspective-building occupants. Until such time DPS shall provide clean water to the building by appropriate means.

12. Water Quality Program Development Outline

A. Water Testing Program
   1. Periodic Testing of Non-Transient Non-Community Water Supplies (if Applicable)
   2. Develop Complainant Process/Forms
   3. Water Testing Subsequent to Renovation or Construction

B. Additional Resources
   1. Safe Drinking Water Act

Water quality shall be tested periodically and follow the appropriate policy regarding sampling procedures, qualified laboratories and analytical disclosure. The Michigan Department of Environmental Quality outlines these procedures. Contaminants that may be required for testing are stipulated by county and procedures are subject to those requirements.

Development Time Parameters: The time parameter for the development of the Water Quality Program is approximately 2-3 months.
SECTION XIII

Integrated Pest Management Program

Integrated pest management (IPM) is an alternative means of pest management developed to reduce the use of toxic chemicals. Our goal is to protect the health of the children and employees of DPS and to decrease the non-point source pollution of Detroit’s ground and surface water through its implementation. The IPM approach is successful in the school and childcare center environment because its cultural and mechanical strategies can be incorporated into ongoing custodial and maintenance activities, such as sanitation, energy conservation, building security, and infrastructure maintenance.

13. Integrated Pest Management (IPM)

A. IPM Program
   1. Pest Management Roles
   2. Setting Pest Management Objectives for Sites
   3. Inspection, Identification, Monitoring
   4. Setting Action Thresholds
   5. Implementation of IPM Strategies
   6. Evaluation of Results & Recordkeeping

B. Additional Factors
   1. outside Contractor Involvement
   2. Facilities Department Involvement

Integrated pest management procedures shall incorporate feasible alternatives to pesticides and herbicides for use on DPS property. This policy shall stipulate procedures to use during application processes and remediation activities.

Development Time Parameter: The IPM Program is complete.
DETROIT PUBLIC SCHOOLS
DEPARTMENT OF ENVIRONMENTAL HEALTH & SAFETY

STRATEGIC PLAN FOR IMPLEMENTATION
OF
COMPREHENSIVE ENVIRONMENTAL HEALTH AND SAFETY PROGRAM

SECTION IV

Comprehensive Environmental Plan Components: (in order of priority)

- Asbestos
- Indoor Air Quality
- Lead
- Mercury
- Arsenic
- Polychlorinated Biphenyls (PCB)
- Hazardous Chemicals and Materials
- Aviary Concerns/Droppings
- Environmental Site Assessments
- Radon
- Electric Magnetic Fields
- Water Quality
- Integrated Pest Management

< COMPREHENSIVE PLAN STATUS <

Completion of Strategic Implementation Plan for ACM

The Department of Environmental Health & Safety has established asbestos as the most significant priority for program development within the Comprehensive Plan. The Strategic Implementation Plan for ACM is a far-reaching set of policies that is intended to standardize and monitor all asbestos-related activities within Detroit Public School facilities.

The Strategic Implementation Plan for ACM, which has been in the developmental phase for approximately seven months, is complete, upon final approval and adoption by the Director and Executive Director of the Department of Environmental Health & Safety.

Although the Strategic Implementation Plan for ACM comprises only one segment of the Comprehensive Environmental Plan, its proportionate weight is substantial. In other words, it encompasses approximately 30% of the environmental activities conducted by the Department. Therefore, the completion of this segment of the Comprehensive Environmental Plan is an essential step toward our goal of full compliance with environmental regulations and guidelines.
Continuation of Comprehensive Environmental Plan Development

The next priority established by the Department is an expansive Indoor Air Quality (IAQ) Policy. This series of guidelines will provide the framework for addressing IAQ issues within Detroit Public Schools far into the future.

The IAQ Policy will include education/training, responding to and diagnosing IAQ complaints, implementation of preventive measures, mitigating IAQ concerns, renovation/construction issues, form development and record keeping processes.

Comprehensive Environmental Plan Component Prioritization:

Subsequent to the completion of the IAQ Policy, the next priorities include Lead, Mercury, Hazardous Chemicals & Materials and Right-To-Know. These components have been chosen next due to their high level of importance within Detroit Public School facilities. Each of these environmental issues will be addressed comprehensively within the Environmental Plan.

After completion of these Plan components, the Department will continue policy development for the outstanding environmental issues that affect our buildings.

Projected Timeline for Development of Outstanding Comprehensive Environmental Plan Components

Although dynamic in nature, the Department of Environmental Health & Safety foresees the Comprehensive Environmental Plan as a set of policies that will guide the District’s Environmental activities for decades to come. The customized policy development is a time consuming process. The Department expects that the projected date for the completion of the Comprehensive Environmental Plan will be the fall of 2004.

Implementation Process for Comprehensive Environmental Plan Components

As the policies for each component of the Plan are developed, the Department will implement them promptly.

For instance, the Strategic Implementation Plan for ACM policy begins with a series of education seminars and training programs for affect District staff, including but not limited to Principals, Administrators, Facility Engineers and Custodial staff.

Another important facet of the educational process is to train Department of Environmental Health & Safety staff in the content and use of the asbestos policy in order to ensure proper implementation. This will include, but not be limited to, instruction to EHS staff on the sequence of policy procedures and the proper completion of policy forms.

Once this asbestos-related education and training are provided, the Department of Environmental Health & Safety will begin the process of instructing applicable staff...
on the components of the IAQ policy. This instruction will include, but not be limited to, methods to prevent IAQ concerns from arising and identifying IAQ issues in-house.