

Indoor Air Quality Standard strengthened

New Jersey is the only state with an Indoor Air Quality (IAQ) standard. The standard applies to buildings occupied by public employees, including school facilities, and is enforced by the Public Employees Occupational Safety and Health (PEOSH) Program in the Department of Health and Senior Services (DHSS). If a PEOSH inspector finds a school district is not in compliance with the standard, the district can be issued orders to comply and given abatement orders by which to comply.

A New Jersey IAQ standard was first won by public employee unions in 1992. It was updated and improved in 2007 thanks to the efforts of the NJEA, Locals 1034 and 1040 of the Communication Workers of America (CWA), Local 195 of the International Federation of Professional and Technical Engineers (IFPTE), and the New Jersey Work Environment Council (WEC).

The new standard presents a significant opportunity to improve IAQ in New Jersey's public school buildings. For this to happen, local associations need to promote IAQ issues. Monitoring PEOSH enforcement will be crucial since it has been weak in the past. PEOSH inspectors must follow a new written protocol in conducting IAQ inspections, including completing a detailed inspection checklist.

What local associations can do

The IAQ Standard will be most effective when used as part of a local plan that includes member education, a health and safety committee, and active rank-and-file involvement, as well as enforcement of the IAQ standard.

- Make sure the district and local association have copies of the PEOSH IAQ publications listed below.
- Educate association members on the requirements of the IAQ standard.
- Check the district's compliance by using the PEOSH IAQ Inspection Checklist online at www.state.nj.us/health/eoh/peoshweb/iaqchecklist.pdf.
- Survey members using the NJEA Indoor Air Quality Occupant Survey, found on Page 207 of the NJEA Health and Safety Manual.
- Summarize the survey results to support the local association's case for needed improvements.
- Meet with the district to present your findings and request their voluntary compliance with the standard.
- If IAQ violations persist, consult with your NJEA UniServ rep and consider filing a complaint with PEOSH.

Filing a PEOSH IAQ complaint

Work with your local association health and safety committee, your local president, or your NJEA UniServ rep when filing a PEOSH complaint.

Take time to fill out the PEOSH complaint form completely and clearly. The hazard description is the most important question on the form. Describe the IAQ problems in detail and attach the documentation you have compiled.

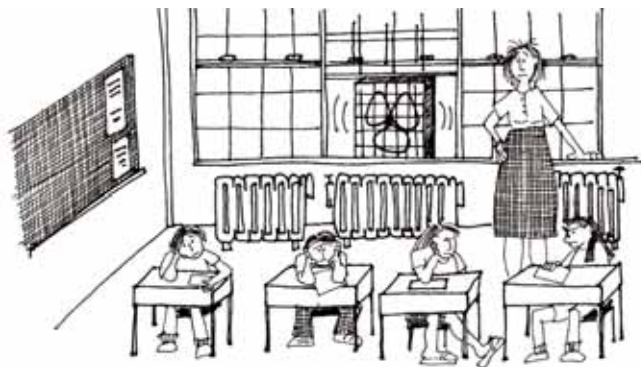
A local association representative has a right to participate in the inspection and receive payment for "normal wages" for the time spent. This includes the opening and closing conference and walking around with the inspector. Under no circumstances may the district choose this representative.

A local association representative should sign the complaint and check the boxes that state, "My name may be revealed to the employer" and "I want to be present when the inspection is conducted." This person's contact information goes at the end of the complaint form. Because inspections are unannounced, listing cell phone and classroom or work-station phone numbers will help to ensure the local association representative can be contacted to participate in the inspection. At the bottom of the complaint form, write in names and phone numbers for alternates who should be contacted in case the complainant is not available.

PEOSH 2007 Educational Materials on Indoor Air Quality

Request these free publications by calling 609-984-1863. Also available online at www.state.nj.us/health/eoh/peoshweb/peoshiaq.htm

- * The PEOSH Indoor Air Quality Standard, N.J.A.C. 12:100-13
- * The IAQ Public Employer's Guide and Model Written Program
- * The IAQ Inspection Checklist
- * The Sample Preventive Maintenance Log
- * The Sample Renovation/Construction Project IAQ Compliance Checklist
- * A Sample Renovation/Construction Project Employee Notification Form



Good things to do during a PEOSH IAQ inspection

1. Attend the opening conference. Ask the inspector to review the PEOSH IAQ Standard, Inspection Guidance Document. Make sure the inspector follows this guidance.
2. Write down the names of those present and what is said at each stage of the inspection.
3. Ask for copies of any documents the district gives the inspector.
4. Ask that someone familiar with the ventilation systems and with keys to locked areas accompany the inspector on the walk-through.
5. Walk around with the inspector.
6. Complete the IAQ Inspection Checklist along with the inspector.
7. Point out problems to the inspector and have members do the same.
8. Have members tell the inspector in private about any health problems that may be related to poor IAQ.
9. Ask the inspector to visit all areas of concern. This might include the roof, mechanical rooms, crawl spaces, basements, and other out-of-the-way locations.
10. Ask the inspector to inspect the ventilation system in detail.
11. Write down information on any samples taken, noting time, place, circumstances, and results, with units.
12. Attend the closing conference.
13. Give input into how long it should take to fix violations.
14. Write down recommendations that are made and ask that they be included in the report.
15. Ask the inspector to return another day to continue the inspection if you don't feel there was enough time to do a thorough inspection.
16. Ask PEOSH for a re-inspection if you feel the inspector didn't do a good job.
17. Once the report is issued, follow up with the guidance of your UniServ rep. Involve union members.
18. If Orders to Comply are issued, ask the district for weekly progress reports and verify that dates for compliance are met. Make sure the orders are posted until the violations have been abated, or for 15 days, whichever is later.
19. If additional recommendations are made, publicize them and make sure they are followed.

IAQ Standard requirements

Designated Person: The district shall designate a person responsible for compliance with the IAQ Standard and ensure he or she is familiar with its requirements.

Written program: The district shall have an up-to-date plan for complying with the standard.

Fresh air: When carbon dioxide levels exceed 1,000 parts per million (ppm), the district shall check and repair the ventilation system to ensure it is working properly. Fresh air intakes shall be relocated if contamination of fresh air intakes from cooling towers, sanitary vents, or vehicle exhaust cannot be eliminated.

Windows: Windows, doors, vents, stacks, and other openings used to allow natural ventilation shall be in operable condition in buildings without mechanical ventilation.

Mold: The district shall promptly repair water leaks and dry, replace, remove, or clean damp or wet materials within 48 hours of discovery and continue until water intrusion is eliminated. Visible mold and mildew shall be removed from ventilation system components and surfaces such as carpeting and ceiling tiles.

Temperature: When indoor temperatures are outside the 68-79 degrees Fahrenheit range, the district shall check and repair the ventilation system to ensure it is working properly.

Ventilation maintenance: The district shall replace or repair damaged or inoperable components of the ventilation system. The district shall establish and follow a preventive maintenance schedule to check, lubricate, and ensure all components are in operating order. Maintenance records shall be kept for three years and be available no later than 10 days after a request to employees or their representatives.

Renovation and construction work: Employees shall be notified at least 24 hours in advance, or promptly in an emergency, of work to be performed on the building that may introduce air contaminants. Renovation areas in occupied buildings shall be isolated, ventilated, and dust and debris confined to the area. Work areas shall be cleaned and aired out prior to reoccupancy.

Chemical Exposure: The district shall use hazard information on labels and Material Safety Data Sheets to select products and control measures used in renovation and construction work.