

9.2.22 Indoor Air Quality Complaint Procedure

Emergency: Contaminated Air

If there is a contamination of the air which is perceived to be a serious and immediate health hazard to the building occupants then the Principal or person in charge shall make decisions on possible evacuation and shall consider: if the contaminant is coming from the outside, would the occupants be safer inside or outside, the supervision required during and after exiting, special health needs of those exiting the building, notifying their supervisor, the parents, transportation, and necessary emergency response organizations.

This protocol is developed to provide a consistent, effective response to air quality complaints from individuals who are present in schools.

Objective

- ✓ To comply with legislation
- ✓ To specify responsibilities but not detail investigation procedures
- ✓ To compliment the OH&S complaint procedure
- ✓ To define a concluding evaluative procedure
- ✓ To provide a perspective on air quality testing
- ✓ To sequence activities in a flow chart

Reference Legislation

Occupational Health and Safety Act - Chapter 7 of the Acts of 1996

Draft of Provincial IAQ Legislation

Roles & Responsibilities in Addressing IAQ Complaints

Complainant

- ✓ Provide information relative to the IAQ complaint to the Principal. The JOH&SC would appreciate the complaints to be in writing so that there is a clear understanding of the problem.
- ✓ It is important to have other investigations, by physicians and by the complainant themselves, going on concurrently, to try to identify the etiology of the health effects outside the school environment.

Principal

If at any stage the problem is solved or the concern satisfied, then the only further action required of the Principal is to notify those involved at that point and record the incident and solution in a permanent site IAQ file with all other records related to the incident. The following are not necessarily done in the order listed.

- ✓ Confer with complainant and investigate. “Occupant” Interview” must be completed. “Occupant Diary” may also be given to complainant.
- ✓ Communicate with maintenance and custodial personnel any actions within their areas of responsibilities, which can be taken to address complaint.
- ✓ Submit written maintenance requests to address facilities conditions relating to complaints.
- ✓ Begin a further investigation of the complaint in consultation with the Joint Occupational Health & Safety Committee.
- ✓ Isolate and change location (if necessary) of activities to improve experienced IAQ.
- ✓ Document signs and symptoms relating to complaints including: location, date identification of key people involved and remedial action taken.
- ✓ Send written notification to the Occupational Health and Safety Officer and/or Manager of Facility Maintenance which shall include all records and documents relating to the complaint.
- ✓ Monitor, follow up, and record corrective action. Review the effectiveness of the corrective actions in consultation with the JOH&SC and the complainant.
- ✓ Maintain a file or files of all IAQ related correspondence, surveys, minutes and other notes relating to IAQ issues or complaints at the school site.

Joint Occupational Health & Safety Committee

- ✓ Accept and discuss written employee IAQ complaints that have been submitted by individuals.
- ✓ Participate with the Principal in the investigation, the review of documentation, records and remedial action taken.
- ✓ Submit written recommendations as deemed necessary by the JOH&SC to the Person with Authority to Address the Complaint (PAAC).

Occupational Health and Safety Officer and Manager of Facility Maintenance

- ✓ Respond to the Principal.
- ✓ Arrange for a facilities inspection to be conducted by a competent person with respect to the complaint or recommendation. The inspection is to be accompanied by a JOH&SC member. It is recommended that the JOH&SC be notified in advance if samples are to be taken.
- ✓ If an individual complains of a symptom or symptoms which they think are caused by the building, then the PAAC will give them the form “Referral of Individual Relating Indoor Air Quality to Symptoms” to complete and take to their physician.
- ✓ A written report of the inspector is to be distributed by the PAAC to the Principal to be posted in the workplace.
- ✓ Initiate actions, to address recommendations suggested by the inspector and ensure the completion of actions.
- ✓ Accept, present alternatives, or refuse with the reasons for the refusal must be submitted to the Manager of Facility Maintenance in writing, to recommendations submitted by the JOH&SC. This written response must be delivered to the JOH&SC in less than 21 days of receiving the recommendations.
- ✓ Review the complaint, the inspection, corrective action, and results and submit a written concluding evaluation to the Principal and the JOH&SC.

Inspection by a Competent Person

- ✓ An internal or external resource person shall be used.
- ✓ The nature of the observed complaints and conditions shall determine the necessary competencies of the resource person as determined by the PAAC.
- ✓ The nature of the investigation and procedures shall be determined by the resource person and the results of the investigation shall be submitted in writing to the PAAC. Detailed investigation procedures are not contained here.

[Please Post on Occupational Health and Safety Bulletin Board]**Occupational Health and Safety
Tri County Regional School Board Complaint Procedure
(Including Air Quality Concerns)**

If any employee has a health and safety concern/recommendation, the following procedures are available:

{Please note this does not concern routine maintenance items. The Principal will ensure that all maintenance requests are submitted and processed in the normal manner and the custodian is made aware of any concerns for cleanliness within the facility}

- Step 1: report your concern or recommendation to your immediate supervisor. If your concern(s) are not dealt with to your satisfaction, proceed to step two.
- Step II: Contact your Joint Occupational Health and Safety Committee/Representative with a description of the concern/recommendation (it would be appreciated if this was done in writing). The complaint is then reviewed and efforts are made to resolve the complaint at the meeting of the JOHSC or at the meeting between the JOHSC/Representative, Principal, and complainant. If the JOHSC/Representative agrees with the concern or recommendation, they will forward their written recommendation to the Principal. The Principal may respond to the recommendation or if outside their authority, refer the recommendation to the Person with Authority to Address the Complaint (PAAC).
- Step III: The JOHSC/Rep. shall submit a 21 Day Notice to the Manager of Facility Maintenance indicate acceptance of the recommendation shall receive a response to the recommendation. The response shall indicate acceptance of the recommendations or give reasons for the disagreement with any recommendations or where it is not reasonably effective.

Evaluation

PAAC will: assess the incident, review the result of the investigation by the competent person, determine actions reasonably practical to address the complaint, communicate in writing to the Principal and JOH&SC. This concludes the response to the complaint. If the investigations and corrective actions do not establish the cause of the complaint, the complaint may not be related to IAQ. All symptoms commonly attributed to IAQ problems may also be caused by other factors, are not necessarily due to air quality deficiencies and may require different solutions.¹

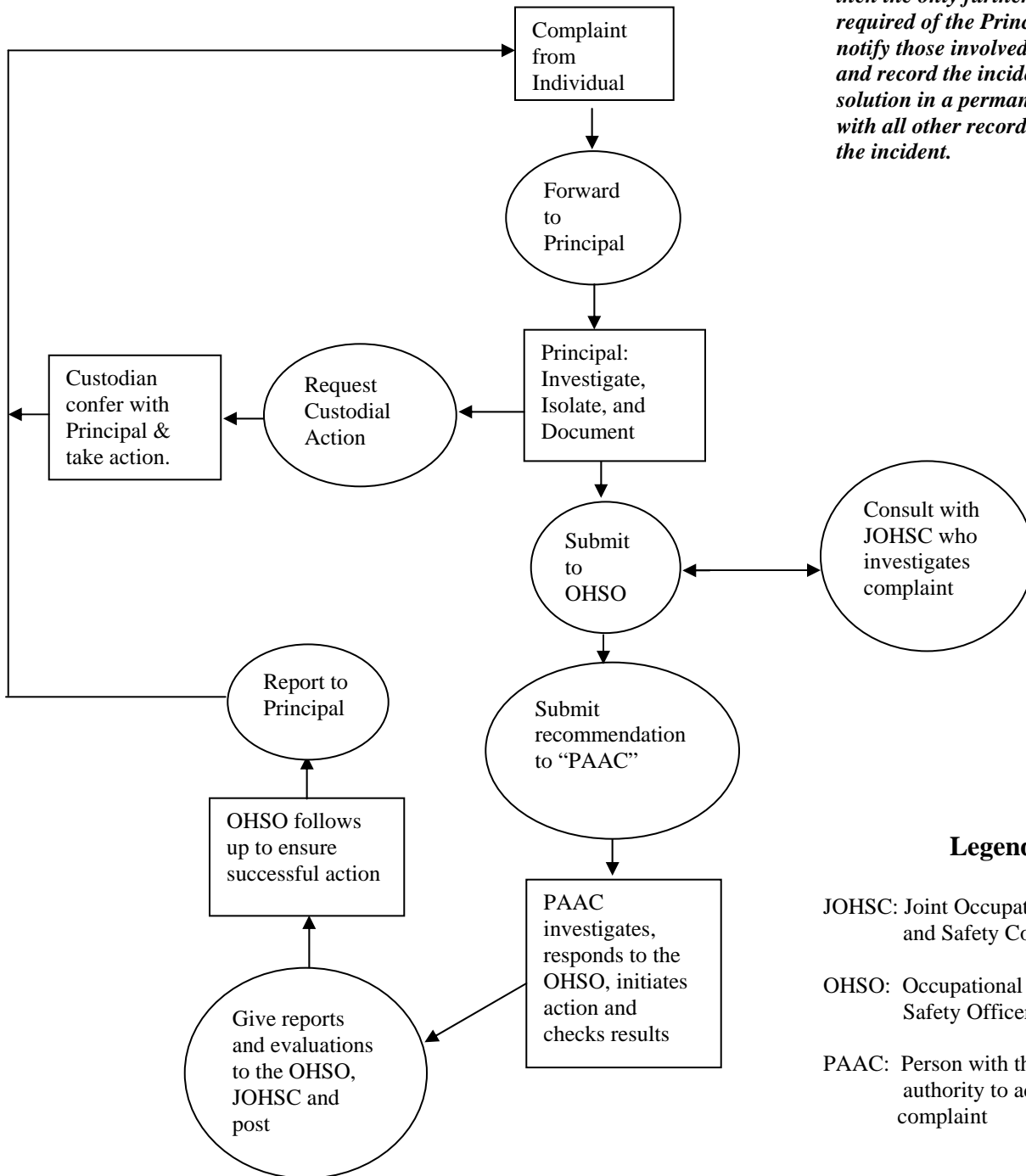
1 . IAQ Backgrounder – Tools for Schools (Environmental Protection Agency, May 1995) Page 4

Air Quality Testing

For the purpose of this document, normal investigation procedures may include measurement of comfort levels (temperature and relative humidity), efficiency of air circulation (CO₂ levels). Testing for contaminants such as VOCs, microbes, formaldehyde, particulate levels, etc.. may not be useful in determining the cause of symptoms and should only be used following investigative procedures that include visual inspection of the site, assessment of mechanical equipment and the general operation and maintenance of the building. Testing may be used to reveal an unidentified contaminant, to confirm the existence of a specific suspected condition, or to verify that clean up procedures have been effective. Authorization for testing must be received from the office of the PAAC.

IAQ Protocol Flow Chart

If at any stage the problem is solved or the concern is satisfied, then the only further action required of the Principal is to notify those involved at that point and record the incident and solution in a permanent IAQ file with all other records related to the incident.



Legend

- JOHSC: Joint Occupational Health and Safety Committee
- OHSO: Occupational Health and Safety Officer
- PAAC: Person with the power and authority to address the complaint