WASHINGTON STATE BOARD OF HEALTH

School Environmental Health and Safety Rule 2024 – 2025

Fiscal Analysis

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WASHINGTON STATE BOARD OF HEALTH

School Environmental Health and Safety Rule 2024 – 2025

Contents

Fiscal Analysis 1

Contents 1

Cost Assumptions 2

Sections Not Analyzed 3

Fiscal Analysis by Section 4

- WAC 246-370-015 Guidance 4
- WAC 246-370-020 Site Assessment 5
- WAC 246-370-030 Construction Plan Review New, Alterations, and Portables ..... **Error! Bookmark not defined.**
- WAC 246-370-040 Routine Inspection 9
- WAC 246-370-050 General Building Requirements 10
- WAC 246-370-070 Indoor Air Quality and Ventilation 11
- WAC 246-370-080 Temperature 17
- WAC 246-370-110 Injury Prevention 18
- WAC 246-370-120 Imminent Health Hazard Procedure 20
- WAC 246-370-130 Playgrounds 21
- WAC 246-370-140 Specialized Rooms 22
- WAC 246-370-150 Variances and Emergency Waivers 23

Cost Assumptions

- **General:** All cost assumptions represent both the school and local health jurisdiction costs to comply with the proposed requirements in chapter 246-370 WAC beyond those currently incurred by 246-366 WAC.

  For example, 246-366-040 (current regulation) and 246-370-030 (proposed regulation) WAC are both subsections for construction plan review. This fiscal analysis will address any new costs or savings that will occur based on the change in requirements from the existing rule to the proposed rule.

- **Labor:** Calculated labor costs assume that the new or additional requirements in chapter 246-370 WAC may require additional labor hours than what are currently required under chapter 246-366. The Board staff surveyed local health officials (LHOs), the Department of Health (department) staff, and school officials to estimate how many additional hours would be required to comply with the new rule requirements. Additionally, they identified staff members who would be mostly likely to perform the additional labor hours. Data from the Office of Financial Management[1], Office of Superintendent of Public Instruction[2] (OSPI), and local health official surveys were used to calculate hourly wages. Benefits and indirect cost are included in the hourly wage estimates. Benefits and indirect costs can vary year by year and are only an approximate percentage of the hourly wage.

  Some, but not all, local boards of health require cost recovery. These boards will assess additional fees to the schools.

  Labor cost categories:

  - **LHO Hours**: LHOs that don't require fees for cost recovery will incur a cost for hourly services.
  - **Hourly LHO Fees**: Schools will incur a cost when their LHOs require fees for cost recovery.
  - **School Official Hours**: School officials provided a range of hours and hourly wages.

- **Construction Costs:** Professional engineers that specialize in school construction supported construction cost calculations.
- **Trade Service Costs:** Board staff conducted phone surveys of industry professionals that perform the work in Washington state, searched the internet, and consulted with professional engineers that specialize in school construction to calculate trade service costs.
- **Consumable Goods:** Board staff priced goods through online retail searches, phone surveys, consulted with professional engineers, and consultation with department staff to calculate consumable goods.
- **Costs Per Square Foot:** OSPI has an Information and Condition of Schools (ICOS) database, which serves as a web-based inventory tracking system for sites and facilities, where they store information and conditions of buildings for each school district.[3]

Schools can enter data that pertains to their school in ICOS. Since there are some costs that are calculated as costs per square foot, we used the self-reported data for 2,058 schools. The smallest school has 929 square feet, an average school has 77,391 square feet, and the largest school has 367,301 square feet.

- **All costs above $1.00 are rounded up to whole numbers.**

Sections Not Analyzed

WAC Section and Title	Section Purpose	Why is section exempt from analysis?
WAC 246-370-001 Purpose Formerly 246-366-005[4]	Introduces the topic of the rule and why the rule is adopted	Clarifies who the rule intends to govern
WAC 246-370-005 Definitions Formerly 246-366-010[5]	Add clarity to rule language and do not impose requirements for schools to conform to	Brings clarity to rule language only
WAC 246-370-010 Applicability Formerly 246-366-060[6], -070[7], and -130[8]	Outlines what type of school this WAC applies to and refers to other regulations that schools must conform to	Clarifies the entities that are governed by this rule and other environmental health and safety regulations that those entities are also governed by
WAC 246-370-060 Showers and Restrooms Formerly WAC 246-366-090[9] and 100[10]	Stipulates shower and restroom requirements for new construction and alteration projects	No changes from WAC 246-366 other than clarifying language and removal of duplicative building code requirements
WAC 246-370-090 Noise Formerly WAC 246-366-110[11]	Stipulates permissible levels of noise within a school facility	No changes from WAC 246-366 other than non-substantive changes clarifying language
WAC 246-370-100 Lighting Formerly WAC 246-366-120[12]	Stipulates required lighting levels based on tasks performed within a school facility	No changes from WAC 246-366 other than non-substantive changes clarifying language
WAC 246-370-160 Severability Formerly WAC 246-366-160[13]	Outlines how individual provisions of the rule are independent from each other and if one provision is found to be invalid the other provisions are not affected	Non-substantive changes clarifying language
WAC 246-370-170 Appeals New WAC Topic	Explains how an entity can appeal a decision made by the local health officer	Explains a process for appeals

Fiscal Analysis by Section

WAC 246-370-015 Guidance

Formerly 246-366-140[14]

WAC 246-366-140 requires the department and OSPI to jointly prepare a guide used by staff during routine inspections. WAC 246-366-140 requires the creation of the guide but does not require updates to the guide at any frequency. The department published the first *Health and Safety Guide for K-12 Schools in Washington State* (K-12 Guide) in June 2000. The department and OSPI published two subsequent updates of the guide. Once in January 2003 and a second in September 2024.

New Requirements of WAC 246-370-015:

- The department must review and update the guide at least every five years.

Costs

Labor: One Time Update Costs

Agency	Position	Hourly Total Compensation	Total Number Hours	Position Total	Total
OSPI	Administrative Program Specialist 2	$ 69	120	$ 8,222	$68,243
Department	Environmental Planner 4	$ 72	350	$ 25,373	
Department	Environmental Planner 3	$ 67	200	$ 13,349	
Department	Environmental Planner 3	$ 67	200	$ 13,349	
LHO	Environmental Health Specialist 3	$106	75	$7,950	

Labor: Once Every Five Years Costs

Agency	Position	Hourly Total Compensation	Total Number Hours	Position Total	Total
OSPI	Administrative Program Specialist 2	$ 69	40	$ 2,741	$ 43,138
Department	Environmental Planner 4	$ 72	300	$ 21,749	
Department	Environmental Planner 3	$ 67	100	$ 6,674	
Department	Environmental Planner 3	$ 67	100	$ 6,674	
LHO	Environmental Health Specialist 3	$106	50	$5,300	

WAC 246-370-020 Site Assessment

Formerly 246-366-030[15]

Site assessments are historical reviews of properties that consider commonly known and reasonably ascertainable information to identify recognized environmental conditions in connection with the subject property and the surrounding area.[16]

WAC 246-366-030 currently requires "the board of education to obtain written approval from the health officer that the proposed development site presents no health problems." WAC 246-366-030 also requires the completion of a noise assessment at the site before beginning construction.

New requirements of WAC 246-370-020

- Adds an American Society for Testing and Materials (ASTM) Phase 1 Environmental Site Assessment.[16]
- Requires a school official to notify the LHO 90 days before construction planning and throughout the plan development stage of the construction project.
- Requires a school official to submit a written report on the health and safety impacts of the construction project.
- Adds a 60-day deadline for LHOs to approve or deny completed site assessments.
- Gives LHOs flexibility to decide if a new school facility on an existing school site or if an addition to an existing school facility requires a site assessment.

Costs

A basic ASTM Phase 1 Site Assessment is a historical research and evaluation project of the site conditions and the surrounding areas. This includes historical land use to determine if there are known soil contamination issues or other environmental factors of interest. If a site assessment is for a renovation of an existing building, then additional research will be required to assess the building use and potential building contamination. If there is a concern about contamination of a site, a Phase 2 Site Assessment might be required. During a Phase 2 site assessment, physical testing of the ground or building materials might be required to confirm contamination and make recommendations for remediation if needed.

Site assessment costs were an estimate from phone surveys of companies that perform site assessments in Washington state.

Trade Service Cost: Site Assessment

Task	Estimated Low Cost	Estimate High Cost
ASTM Phase 1 Site Assessment[16]	$1,400	$5,000
ASTM Phase 2 Site Assessment[16]	$10,000	$30,000

Schools surveyed indicated that smaller schools without dedicated staff or larger schools would take longer to complete the site assessment than those schools with dedicated staff.

Labor: Site Assessment Additional Costs

Labor Category	Hourly Wage			Number Hours			Total Costs Per Site Assessment		
	Min	Avg.	Max	Min	Avg.	Max	Min	Avg.	Max
LHO Hours	$40	$71	$105	3	7	12	$120	$497	$1,260
Hourly LHO Fee	$100	$162	$250	3	7	12	$300	$1,134	$3,000
School Official	$48	$107	$133	2	61	200	$96	$6,527	$26,600

Total Labor Costs

Labor Description	Min	Avg.	Max
Total Costs to LHO without fee recovery	$120	$497	$1,260
Total Costs to LHO with fee recovery	$0	$0	$0
Total costs to schools if charged LHO Fee	$396	$7,661	$29,600
Total costs to schools if not charged LHO Fee	$96	$6,527	$26,600

WAC 246-370-030 Construction Plan Review New, Alterations, and Portables

Formerly 246-366-040(1)&(2)(a)[17]

Before the start of construction, a school official must submit construction plans for review and approval. The LHO must review the plans and discuss possible changes to construction based on current health and safety regulations. Once construction is complete, the LHO will inspect the newly constructed building to ensure there are no imminent health hazards present and that the building is in compliance with the current regulations.

New requirements of WAC 246-370-030

- Added additional parameters requiring a construction plan review:
  - New or altered playgrounds
  - New or altered specialized rooms
  - New or altered bathrooms or showers
  - Remodeling an existing building that was not used as a school facility
  - Altering more than 5,000 square feet or 20% of the total square feet of the school
  - Installation of a portable classroom
- Added a specific timeline for the construction plan review:
  - A school official will consult with LHO at 50% design development.
  - A school official will request a preoccupancy inspection at least five days in advance.
  - LHO has 15 days from receipt of a request to consult with a school official.
  - LHO provides construction review results within 60 days of receiving the completed 100% design development paperwork.
- Added flexibility for school officials and LHOs:
  - After the initial construction review at 50% design development, the LHO determines if additional review is needed.
  - If at any time the LHO cannot meet the required timeline requirement of 246-370-030 WAC, the school official may choose to proceed with construction.

Costs

Findings from LHO surveys concluded that the local health staff already performed these tasks and no additional labor hours would be required.* Most schools surveyed indicated that it would take up to four additional hours to complete the construction plan review, while two smaller schools without dedicated staff indicated that it would take 40 to 100 additional hours to complete the construction plan review process in the proposed rule.

Labor: Construction Plan Review

Labor Category	Increase in Hours			Hourly Wage			Total		
	Min	Avg.	Max	Min	Avg.	Max	Min	Avg.	Max
*LHO Hours	0	0	0	$0	$0	$0	$0	$0	$0
School Official Hours	0	13	100	$46	$106	$134	$0	$1,378	$13,400

WAC 246-370-040 Routine Inspection

Formerly WAC 246-366-040(2)(b)[18]

Routine inspections of school facilities by an LHO ensure that the environmental health and safety of the school complies with the regulations. WAC 246-360-040(2)(b) requires an LHOs to inspect school facilities on a routine basis.

NEW requirements of WAC 246-370-040

- LHOs must inspect school facilities once every three years.
- LHOs have the flexibility to increase the frequency of inspections up to once every year or decrease the frequency of inspections to once every five years based on local risk factors or credible data.
- An LHO may have a qualified designee complete additional inspections.
- LHOs have 60 days to issue a final report to school officials

Cost

Labor Additional Costs Per Routine Inspection

Labor Category /Task	Hourly Wage		Number of Hours		Per routine inspection	
	Min	Max	Min	Max	Min	Max
LHO Hours	$40	$105	1	2	$40	$210
School Official Hours	$42	$133	0	6	$0	$798
				Total	**$40**	**$1,008**

Labor Additional Costs for Routine Inspection Per Year

Labor Category /Task	Hourly Wage		Number of Hours		Per year	
	Min	Max	Min	Max	Min	Max
LHO Hours: Training	$40	$105	0	40	$0	$4,200
School Official Hours: Training	$42	$133	4	6	$168	$798
				Total	**$168**	**$4,998**

WAC 246-370-050 General Building Requirements

Formerly WAC 246-366-050[19]

This section of the rule describes the basic requirements that all school facilities should comply with such as:

- Clean and in good repair
- Free of pests
- Appropriate floors for intended use
- Adequate storage for loose items to prevent injuries
- Toilet and handwashing facilities available during school and school events

New requirements from WAC 246-370-050

- Add vacuum breakers or backflow devices on all faucets that can connect a hose or tube to the fixture and be used for activities like filling a mop bucket or diluting chemicals.

Cost

Any sink that can connect a hose or tube to faucets requires a vacuum breaker or back-flow prevention device installed to prevent potential backflow of unsafe water into the potable water pipes of the school facility. These can be purchased at a local hardware store or purchased online and shipped directly to the school. The plumbing code requires backflow prevention devices; however, we are unable to determine how many schools currently have backflow devices or how many sinks can connect a hose or tube, therefore the total cost to schools is indeterminant.

Consumable Goods: One Time Cost

Goods	Cost (Per Device)	
	Min	Max
Self-Draining Vacuum Breaker[20]	$9	$25
Faucet with inline Vacuum Breaker[21, 22]	$96	$130

WAC 246-370-070 Indoor Air Quality and Ventilation

Formerly WAC 246-366-080[23]

NEW WAC Chapter

This new chapter of WAC includes specific requirements to improve and maintain indoor air quality. Indoor air quality standards help to control airborne pollutants and introduce and distribute adequate outdoor airflow. This contributes to a favorable environment for students, better performance of teachers and staff, and a sense of comfort, health, and well-being. Comparative risk studies performed by the Environmental Protection Agency (EPA) and its Science Advisory Board (SAB) have consistently ranked indoor air pollution among the top five environmental risks to public health. Improper indoor air quality can increase health issues such as cough, eye irritation, headache, and asthma. Nearly one in 13 children of school-age have asthma, the leading cause of school absenteeism due to chronic illness. Substantial evidence shows that indoor environmental exposure to allergens, such as dust mites, pests, and molds, can trigger asthma symptoms. These allergens are common in schools.[24]

NEW requirements from WAC 246-370-070

- Develop an indoor air quality plan.
- Remove and exclude potential sources of air contaminants.
- Develop an integrated pest management plan.
- Monitor carbon dioxide concentrations.
- Test for radon.
- Prohibit fragrances.
- Contain emissions from construction.
- Control mold growth and exposure.
- Provide appropriate ventilation.
- Provide appropriate air filtration.
- Inspect and maintain ventilation systems.
- Test and balance mechanical ventilation systems every 15 years.

Costs: Indoor Air Quality

Labor Indoor Air Quality: One Time Cost

Some schools surveyed stated that they already developed radon testing plans and integrated pest management plans so this would not be a new cost for all schools, just those that would need to develop the plans.

Task	Hourly Wage		Number of Hours		One Time Costs	
	Min	Max	Min	Max	Min	Max
Develop radon plan	$43	$134	0	10	$0	$1,340
Develop indoor air quality plan	$43	$134	8	32	$344	$4,288
Develop integrated pest management plan	$43	$134	0	10	$0	$1,340
				Total Costs	**$344**	**$6,968**

Labor Indoor Air Quality: Annual Cost

Some schools surveyed indicated that they already implement the requirements of the proposed indoor air quality section of this rule in their schools and therefore they would not incur any new costs. Only schools that have not implemented these requirements would incur costs. The total cost to all schools is indeterminant.

The rule requires “routine” ventilation inspections. Depending on the type of system, the school could complete this task several times a year. The total annual cost to schools is indeterminant, however listed below is the cost to perform one inspection a year.

Task	Hourly Wage		Number of Hours		Annual Costs	
	Min	Max	Min	Max	Min	Max
Routine ventilation Inspection	$43	$134	2	8	$86	$1,072
Implement radon plan	$43	$134	1	50	$43	$6,700
Implement indoor air quality plan	$43	$134	17	68	$731	$9,112

Consumable Costs: Radon Testing Every Five Years

The proposed rule requires radon testing once every five years. Schools test radon on all ground-floor or sub-ground classrooms in a school. Using data from ICOS, we can estimate the number of classrooms that would need to be tested, but we cannot determine the total. Data shows that schools range from one floor up to seven floors and have anywhere from one classroom to 120 classrooms. The data shows at least one school with a single floor and 87 classrooms.

Task	Test Cost		Number of Tests		One time costs	
	Min[25]	Max[26]	Min	Max	Min	Max
Radon test	$12	$16	1	87	$12	$1,392

Labor Integrated Pest Management Plan: Annual Costs

Schools surveyed said that if they did not have dedicated staff members to implement a pest management plan or have never implemented a pest management plan, it would take an additional 200 to 600 hours annually to implement a pest management plan.

Task	Hourly Wage			Number of Hours			Annual Costs		
	Min	Avg.	Max	Min	Avg.	Max	Min	Avg.	Max
Implement integrated pest management plan	$43	$80	$114	200	440	600	$8,600	$35,200	$68,400

Schools with dedicated staff or schools that already have a pest management plan said they would need the following additional hours to implement an integrated pest management plan.

Task	Hourly Wage			Number of Hours			Annual Costs		
	Min	Avg.	Max	Min	Avg.	Max	Min	Avg.	Max
Implement integrated pest management plan	$43	$80	$114	5	12	18	$215	$960	$2,052

Costs: Ventilation

The ventilation and filtration subsections of WAC 246-370-070 allow schools the flexibility to maximize outdoor airflow rates and increase filtration where possible within the capabilities of the systems that already exist within the school facility. This means that schools will only incur costs based on where their current ventilation needs require them to make changes.

Included in this report are all potential costs for schools to conform with WAC 246-370-070(7)(b) of the proposed rule. Many of these costs in this section will depend on the size of the school to determine the total cost to comply with the proposed rule. Since school sizes vary from school to school some of the total costs to schools will be indeterminant. If the total costs to a school are indeterminant, a costs per square foot or the total cost of one consumable good was determined.

For ventilation specifically, schools are given three options to comply with the ventilation requirements in the proposed rule.

1. WAC 246-370-070(7)(b) “Ensuring all student-occupied instruction and gathering spaces during hours of occupation provide outdoor air ventilation flow rates as set forth in chapter 51-52 WAC at the time the ventilation system was permitted.”

   If a school’s ventilation system complies with this subsection of the rule the school does not need to take any further action and therefore will not incur a cost.

2. If the school cannot comply with WAC 246-370-070(7)(b), then WAC 246-370-070(7)(b)(i) states "If outdoor air ventilation flow rates were not established at the time of the original building construction, ventilation airflow rates must be operated to meet chapter 51-52 WAC or maximum outdoor air ventilation flow rates achievable within existing system capacity."

   To conform with this subsection of the proposed rule, a school must hire a professional to test and balance (TAB) the ventilation system.

Trade Services: One Time Cost

Task	Cost (per sq ft)	Small School	Average School	Large School
Test and Balance	0.81	929	77,391	367,301
	Total	**$753**	**$62,687**	**$297,514**

3. If the school cannot comply with WAC 246-370-070(7)(b) or WAC 246-370-070(7)(b)(i), then the school must conform with WAC 246-370-070(7)(b)(iii) which states "*If the school facility does not have a mechanical outdoor air ventilation system or the outdoor air flow rate cannot be determined, provide ongoing carbon dioxide concentration monitoring.*"

   To conform with this subsection of the rule a school must develop a carbon dioxide monitoring plan and purchase carbon dioxide sensor to monitor carbon dioxide in at least one room.

Consumable Goods Ventilation: One Time Cost

Goods	Cost (per room)	
	Min	Max
Portable carbon dioxide sensor	$170	$3,425
Fixed carbon dioxide sensor and installation	$2,000	$2,500

Labor Ventilation: One Time Cost

Task	Hourly Wage		Number of Hours		One Time Costs	
	Min	Max	Min	Max	Min	Max
Develop carbon dioxide monitoring plan	$43	$134	5	10	$215	$1,340

Labor Ventilation: Initial Cost

Task	Hourly Wage		Number of Hours		Annual Costs	
	Min	Max	Min	Max	Min	Max
Implement carbon dioxide monitoring plan	$43	$134	25	200	$1,075	$26,800

Labor Ventilation: Reoccurring Annual Cost

Task	Hourly Wage		Number of Hours		Annual Costs	
	Min	Max	Min	Max	Min	Max
Implement carbon dioxide monitoring plan	$43	$134	20	175	$860	$23,450

Costs: Filtration

Included in this report are all potential costs for schools to conform with WAC 246-370-070(8) of the proposed rule. The costs in this section will depend on the size of the school to determine the total cost to comply with the proposed rule. Since school sizes vary from school to school, the total costs for schools will be indeterminant. Since the total costs to a school are indeterminant, we used a cost per square foot to comply with this rule.

Consumable Goods Ventilation: Annual Cost

Schools are given two options to comply with the filtration requirements WAC 246-370-080(8) of the proposed rule.

1. WAC 246-370-070 (8)(a) "*Provide adequate filtration by ensuring particulate matter filtration as set forth in chapter 51-52 WAC at the time the heating, ventilation, and air conditioning systems were permitted, including in facilities that have small, ducted air handlers and ventilation systems.*"

   If a school's filtration system complies with this subsection of the rule the school does not need to take any further action and therefore will not incur a cost.

2. If the school cannot comply with WAC 246-370-070(8)(a) then WAC 246-370-070(8)(a)(i) states "*If particulate matter filtration requirements were not established at the time of the original installation of the system, the system must meet chapter 51-52 WAC or the maximum particulate matter filtration achievable within existing system capacity.*"

Goods	Cost (per sq ft)		Square Feet		Total	
	Min	Max	Min	Max	Min	Max
Increase filter size from MERV 8 to MERV 13	$0.07	$0.10	929	367,301	$66	$36,731
Increased utility rates depending on fuel source	$0.01	$0.02	929	367,301	$10	$7,347

Trade Services: Once every 15 years

TAB involves testing and adjusting the air and water flow, pressure, temperature, and humidity of heating, ventilation, and air conditioning (HVAC) systems. Certified professionals typically test the system, which requires specialized equipment to measure and adjust the HVAC systems. Visual inspection, functional testing, measuring airflow rates, adjusting system components, and documenting the results are all part of the TAB process.[27] The total cost to schools to perform a TAB will vary from school to school depending on school size and therefore is indeterminant.

Task	Cost (per sq ft)	Small School	Average School	Large School
Test and Balance	0.81	929	77,391	367,301
	Total	**$753**	**$62,687**	**$297,514**

WAC 246-370-080 Temperature

Formerly

This section of the rule stipulates the permissible indoor temperature range of school facilities. WAC 246-366-090 and WAC 246-370-090 require that classrooms maintain a minimum temperature of 65° Fahrenheit and that gymnasiums and other "common" areas maintain a minimum temperature of 60° Fahrenheit.

New requirements from WAC 246-370-080

- Sets a maximum indoor temperature of 79° Fahrenheit for the school facility.
- Requires school officials to develop an extreme temperature readiness plan.

Costs

Each school facility will prepare a customized plan to implement when the facility or parts of the facility are consistently above or below the minimum or maximum temperatures required in WAC 246-370-090 for extended periods of time. Since weather conditions vary from year to year and the readiness plan is uniquely tailored to each school, the total annual cost to implement the plan is indeterminant.

Labor Extreme Temperature Readiness Plan

Task	Hourly Wage		Number of Hours		Total	
	Min	Max	Min	Max	Min	Max
Develop Extreme Temperature Readiness Plan	$65	$133	1	10	$65	$1,330

WAC 246-370-110 Injury Prevention

Formerly WAC 246-366-050[28]

This section of the rule requires general overall facility injury prevention.

NEW requirements from WAC 246-370-110

- Provide fall protection for balconies and orchestra pits
- Store unsecured equipment when not in use
- Update chemical and cleaning supply storage
- Provide fragrance-free and low-hazard cleaning and sanitation supplies
- Develop an animal safety plan

Cost

Consumable Goods: One Time Cost

Adequate fall guards are required when two adjacent occupied areas have a height distance of 30 inches are more per chapter 1015.2 of the 2024 International Building Code.[29] Most schools would already have the required protection in place. The size of an area that would require a fall guard varies from school to school, therefore the total cost to install fall guards is indeterminant.

Goods	Cost (per linear foot)
Fall protection guards	$350

Labor Chemical and Cleaning Supply Storage: One Time

Proper storage and use of cleaning and chemical supplies requires a school to do an initial walkthrough of the school and inventory the supplies. Some schools, especially small elementary schools, may already be complying. Larger high schools with multiple specialized classrooms or older schools with large amounts of outdated or unlabeled supplies will take longer to inventory and properly store all supplies. Schools already in compliance will only have recurring annual maintenance costs.

	Hourly Wage		Number of Hours		One Time Costs	
Task	Min	Max	Min	Max	Min	Max
Initial inventory	$43	$134	0	32	$0	$4,288

Labor Chemical and Cleaning Supply Storage: Annual Cost

	Hourly Wage		Number of Hours		One Time Costs	
Task	Min	Max	Min	Max	Min	Max
Yearly Maintenance	$43	$134	1	10	$43	$1,340

Fragrance-Free and Low-Hazard Cleaning Supplies

Fragrance-free and low-hazard cleaning supplies are comparable in price to equivalent supplies with fragrances or those that pose a higher health hazard. Schools won't incur an additional cost to comply with this requirement of the proposed rule.

Labor Animal Safety Plan: One Time Cost

Not all schools allow animals on the premises and would not require an animal safety plan.

Task	Hourly Wage		Number of Hours		One Time Costs	
	Min	Max	Min	Max	Min	Max
Develop animal safety plan	$43	$134	0	120	$0	$16,080

WAC 246-370-120 Imminent Health Hazard Procedure

NEW WAC Chapter

This section of the rule requires that a school official takes action when an imminent health hazard is identified in a school facility. An imminent health hazard could be a sewage leak, prolonged utility interruption, fires, floods, etc.

NEW requirements from WAC 246-370-120

- Identify and mitigate exposure to an imminent health hazard
- Collaborate between school officials and LHOs to investigate the potential hazard

Costs

School officials currently identify and mitigate potential health hazards in schools. There will be no additional costs to schools to conform to this requirement.

Labor Imminent Health Hazard Annual Cost

LHOs expect that there will be additional labor hours associated with this requirement now that school officials are required to report potential health hazards to their local health department.

Labor Category /Task	Hourly Wage		Number of Hours		Annual Costs	
	Min	Max	Min	Max	Min	Max
LHO Hours: consulting	$40	$105	1	100	$40	$10,500

WAC 246-370-130 Playgrounds

NEW WAC Chapter

This section of the rule sets minimum installation and maintenance requirements for new and updated playgrounds.

NEW requirements from WAC 246-370-130

- A school official must submit plans and consult with their LHO before installing, updating, or modifying playground structures or fall protection surfaces.
- The LHO has 60 days to approve or deny the school official's plans for playground construction.
- School officials must maintain equipment consistent with ASTM F 1487 Standard Consumer Safety Performance Specification for Playground Equipment for Public Use and Consumer Product Safety Commission Handbook for Public Playground Safety, 2010.
- School officials cannot use chromated copper arsenate or creosote-treated wood to construct or install playground equipment, landscape structures, or other structures.

Costs

Playground inspections are performed when replacing existing equipment or constructing a new playground on an existing school facility site. Depending on the size and the nature of the equipment, the time to conduct these inspections would vary. When surveyed, LHOs explained that they already perform these inspections, but it might take additional time now that there are requirements in the proposed rule language. School officials indicated zero additional labor hours incurred by these proposed rules.

Labor: Playground Inspections Additional Costs

Labor Category	Hourly Wage		Number Hours		Total Costs Per Site Assessment	
	Min	Max	Min	Max	Min	Max
LHO Hours	$40	$105	0	3	$0	$315
Hourly LHO Fee	$100	$250	0	3	$0	$750

Total Labor Costs

Labor Description	Min	Max
Total Costs to LHO without fee recovery	$0	$315
Total Costs to LHO with fee recovery	$0	$0
Total costs to schools if charged LHO Fee	$0	$750
Total costs to schools if not charged LHO Fee	$0	$0

WAC 246-370-140 Specialized Rooms

Formerly WAC 246-366-140[30]

WAC 246-366-140 mentions minimum health and safety standards for chemical laboratories. WAC 246-370-150 created the definition of a "specialized room" to include more than just chemistry laboratories. Specialized rooms are classrooms that have a specific function that uses equipment, furniture, or supplies not found in a standard classroom that are a potential health and safety risk. This may include, but is not limited to, a career and technical education room, a laboratory, an art room, or a health room. These types of rooms could require special ventilation and permit temperatures outside of a normal classroom range.

NEW requirements from 246-370-140

- Requires emergency eye wash and showers in specialized rooms, not just installing them at the time of new construction
- Requires single-use soap and towels in hand-washing facilities
- Adds the Washington State Labor and Industry requirements for emergency eye wash and shower installation and fixture requirements
- Prohibits shock-sensitive and lethal at low-concentration compounds
- Requires safety procedures for students
- Provides personal protective equipment
- Requires installation of appropriate ventilation equipment for specialized room activities that produce air contaminants
- Adds specific requirements for school facilities that have health rooms such as showers and bathrooms
- Includes emergency shut off for gas and electricity in new construction

Costs

Construction costs are minimum estimates based on basic expected costs with assumptions that there could be at minimum ceiling work and floor work for all these installations. Some assumptions were made about electrical, plumbing, and parts costs as well. Not all schools will need to incur these costs so a total school cost is indeterminant.

Construction: One Time Cost

Goods	Construction Cost	City Capacity Fee	Total
Emergency Eye Wash Install	$4,000	$0	$4,000
Emergency Shower Install	$6,000	$0	$6,000
Source Capture Ventilation	$20,000	$0	$20,000
Handwashing Sink	$3,000	$1,370	$4,370
Bathroom - Toilet	$5,000	$4,100	$9,100
Bathroom - Urinal	$5,000	$3,420	$8,420
Emergency Shut Off Valves: Gas	$5,000	$0	$5,000
Emergency Shut Off Valves: Electric	$2,500	$0	$2,500

WAC 246-370-150 Variances and Emergency Waivers

Formerly WAC 246-366-150[31]

This section of the rule outlines how a school official can request an exception to the rule requirements. The request must show how the alternative to the rule still meets the intent.

NEW requirements from WAC 246-370-150

- Requires an LHO to approve or deny a variance within 60 days of receiving a complete variance packet
- Allows an LHO to issue an emergency waiver in an instance where a school might have to temporarily use a facility that is not regularly used as a school
- Allows an LHO to permit a school to remain in operation during an imminent health hazard event if it is safe to do so

Costs

Labor Variances Additional Costs

Labor Category	Hourly Wage		Number Hours	Total Costs Annually	
	Min	Max	Total	Min	Max
LHO Hours	$40	$105	10	$400	$1,050
Hourly LHO Fee	$100	$250	10	$1,000	$2,500

Total Additional Labor Costs

Labor Description	Min	Max
Total Costs to LHO without fee recovery	$400	$1,050
Total Costs to LHO with fee recovery	$0	$0
Total costs to schools if charged LHO Fee	$1,000	$2,500
Total costs to schools if not charged LHO Fee	$0	$0

1 https://ofm.wa.gov/state-human-resources/compensation-job-classes/job-classes-and-salaries
2 https://ospi.k12.wa.us/sites/default/files/2024-02/allpersonnelsummaryreport2023-24.pdf
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5 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-010&pdf=true
6 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-060&pdf=true
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10 https://app.leg.wa.gov/WAC/default.aspx?cite=24 6-366-100&pdf=true
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