WASHINGTON STATE BOARD OF HEALTH

Notice of Public Meeting

School Environmental Health and Safety Rule Project
Technical Advisory Committee
Thursday, May 15, 2025, 11:00 a.m. – 4:30 p.m.
Physical meeting location:
Interurban Hotel
223 Andover Park E
Tukwila, WA 98188
Meeting Room: Mount Si II
Virtual meeting: ZOOM Webinar
(hyperlink provided on next page)
Language interpretation available

Agenda

Time	Agenda Item	Speaker
	Call to Order	Patty Hayes, TAC Chair
11:00 a.m.	1. Minutes Review	Patty Hayes, TAC Chair
11:05 a.m.	2. Reminders	Patty Hayes, TAC Chair
11:10 a.m.	3. Objectives and Meeting Agreement	Andrew Kamali, Project Manager
11:15 a.m.	4. Review Report Draft	Andrew Kamali, Project Manager
12:30 p.m.	Lunch	
1:30 p.m.	5. Review Report Draft	Andrew Kamali, Project Manager
3:00 p.m.	Break	
3:10 p.m.	6. Discuss FAQ	Andrew Kamali, Project Manager
3:50 p.m.	7. Review Playground Cards	Andrew Kamali, Project Manager
4:20 p.m.	8. Recap/Next Steps	Andrew Kamali, Project Manager
4:30 p.m.	Adjournment	

WASHINGTON STATE BOARD OF HEALTH

To access the meeting online and to register:
https://us02web.zoom.us/webinar/register/WN_tetQ1uJ5Qdmb7bF2U1YOdA

You can also dial-in using your phone for listen-only mode:

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Webinar ID: 898 8466 0580
Passcode: 768692

Important Meeting Information:

- Times are estimates only. We reserve the right to alter the order of the agenda.
- Every effort will be made to provide Spanish interpretation, American Sign Language (ASL), or Communication Access Real-time Transcription (CART) services. Should you need confirmation of these services, please email wsboh@sboh.wa.gov in advance of the meeting date.
- If you would like meeting materials in an alternate format or a different language, or if you are a person living with a disability and need reasonable modification, please contact the State Board of Health at (360) 236-4110 or by email wsboh@sboh.wa.gov. Please make your request as soon as possible to help us meet your needs. Some requests may take longer than two weeks to fulfill.
- TTY users can dial 711.

Formal Comment Period. Through May 21, 2025, you can provide comments on the Amendment and Repeals for Chapter 246-366 WAC and Chapter 246-366A, School Environmental Health and Safety Rule.

WASHINGTON STATE BOARD OF HEALTH

Aviso de reunión pública

Proyecto de normas de salud y seguridad ambiental escolar
Comité de Asesoramiento Técnico
Jueves, 15 de mayo de 2025, de 11:00 a. m. a 4:30 p. m.
Lugar de la reunión:
Interurban Hotel
223 Andover Park E
Tukwila, WA 98188
Sala de reunión: Mount Si II
Virtual meeting: seminario web por Zoom
(hipervínculo en la página siguiente)
Hay servicios de interpretación a otros idiomas disponibles.

Orden del día

Hora	Punto del orden del día	Orador
	Apertura	Patty Hayes, presidenta del TAC (por su sigla en inglés, Comité de Asesoramiento Técnico)
11:00 a.m.	1. Revisión de actas	Patty Hayes, presidenta del TAC
11:05 a.m.	2. Recordatorios	Patty Hayes, presidenta del TAC
11:10 a.m.	3. Objetivos y acuerdo de la reunión	Andrew Kamali, gerente de proyectos
11:15 a.m.	4. Revisión del informe preliminar	Andrew Kamali, gerente de proyectos
12:30 p.m.	Almuerzo	
1:30 p.m.	5. Revisión del informe preliminar	Andrew Kamali, gerente de proyectos
3:00 p.m.	Receso	
3:10 p.m.	6. Debate sobre las preguntas frecuentes	Andrew Kamali, gerente de proyectos
3:50 p.m.	7. Revisión de las tarjetas para patios	Andrew Kamali, gerente de proyectos
4:20 p.m.	8. Repaso y pasos a seguir	Andrew Kamali, gerente de proyectos
4:30 p.m.	Levantamiento de la sesión	

WASHINGTON STATE BOARD OF HEALTH

Para acceder a la reunión en línea y registrarse:
https://us02web.zoom.us/webinar/register/WN_tetQ1uJ5Qdmb7bF2U1YOdA

También puede participar por teléfono, mediante la modalidad de solo escucha:

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Id. del seminario web: 898 8466 0580
Contraseña: 768692

Información importante sobre la reunión:

- Los horarios son estimativos. Nos reservamos el derecho de modificar el orden de los puntos que se tratarán en la reunión.
- Se hará todo lo posible para proporcionar interpretación en español, ASL (por su sigla en inglés, lenguaje de señas americano) o servicios de CART (por su sigla en inglés, transcripción en tiempo real). Si necesita confirmación sobre estos servicios, envíe un correo electrónico a wsboh@sboh.wa.gov antes de la fecha de la reunión.
- Si desea acceder a los materiales de la reunión en un formato alternativo o en otro idioma, o si tiene una discapacidad y necesita una modificación razonable, comuníquese con la Mesa Directiva de Salud llamando al (360) 236-4110 o enviando un correo electrónico a wsboh@sboh.wa.gov. Le pedimos que presente su solicitud lo antes posible para ayudarnos a satisfacer sus necesidades. Es posible que algunas solicitudes tarden más de dos semanas en atenderse.
- Marque 711 para el servicio de TTY.

Período de comentarios formales Hasta el 21 de mayo de 2025, puede enviar comentarios sobre la Modificación y derogaciones del Capítulo 246-366 del WAC (por su sigla en inglés, Código Administrativo de Washington) y del Capítulo 246-366A, Normas de Salud y Seguridad Ambiental Escolar (solo en inglés).

WASHINGTON STATE BOARD OF HEALTH

School Environmental Health and Safety Rule Project 2024 - 2025

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Patty Hayes WSBOH Chair		Washington State Board of Health
Tyler Muench Director of Advocacy & External Affairs	**Randy Newman** Director of School Facilities & Organization	Washington State Office of Superintendent of Public Instruction
Steve Main Division Director, School Safety Lead	**Sandy Phillips** School Health and Safety Program Technical Advisor	Spokane Regional Health District
Gina Yonts Associate Director	**Roz Thompson** Director of Government Relations	Association of Washington School Principals
Geoff Lawson Operations Coordinator	**Jeff Rogers** Manager or Environmental Health & Safety	Washington Association of Maintenance and Operation Administrators & Tacoma School District
Tammy Allison Board Director – Region 121	**Nicole Roel** WASBO Board of Directors, Olympia ESD 114	Washington Association of School Business Officials
David Hammond School Construction Committee Chair	**Dan Steele** Assistant Executive Director, Government Relations	Washington Association of School Administrators
Suzie Hanson Executive Director	**Sharon Ricci** Community Relations	Washington Federation of Independent Schools
Kate Espy Board Member and Legislative Representative		South Kitsap School District
Erin Hockaday Senior Manager, Surveillance & Investigation	**Bailey Stanger**	Benton-Franklin Health District

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Laurette Rasmussen School EH Specialist	**Jamie Bodden** WSALPHO Managing Director	Whatcom County Health & Community Services
Lauren Jenks Assistant Secretary, Environmental Public Health	**Kelly Cooper** Director, Policy and Legislative Relations	Washington State Department of Health
Kevin Jacka Executive Director	**Richard Conley** Consultant	The Rural Alliance
Samantha Fogg Co-President Seattle Council PTSA		Seattle Council PTSA
Devon Kellogg Volunteer WSPTA, Advocacy Committee	**Susan Baird-Joshi** Volunteer WSPTA	Washington State PTA
Laura Peterson Volunteer/Appointed Role WSPTA		Washington State PTA
Brook Wilkerson Director of Operational Supports	**Anders Lindgren** President	School Ops
Preet Singh Director of Health Services	**Jessica Sankey** Chief Operations Officer	Bellingham Public Schools
Brian Buck Executive Director of Support Services	**Kenny Johnson** Director of Maintenance & Operations	Lake Washington School District
Kellie Lacey Assistant Director of Human Resource	**Kelsey Greenough** Records Specialist	Richland School District
Nicole Daltoso Senior Director of Capital Facilities	**Theodore (Ted) Dehnke** Assistant Director of Maintenance	Evergreen Public Schools

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Brian Freeman Superintendent		Inchelium School District
Becky Doughty Executive Director of School Support Services (Operations)	**Sandra Jarrad** Chief Communications Officer	Spokane Public Schools
Jared Mason-Gere Government Relations Staff	**Julie Salvi** Lobbyist/Government Relations	Washington Education Association
Pam Schwartz Assistant Superintendent	**Doug Rich** Superintendent	Washington State Catholic Conference
Jake Cook Public Advocate		Public

School Rule Project Staff

Andrew Kamali
School Rule Project Manager

Nina Helpling
Policy Advisor

Mary Baechler
Community Engagement Coordinator

Marcus DeHart
Communications Consultant

Crystal Ogle
Administrative Assistant

GUIDANCE FOR SPEAKING WITH LANGUAGE INTERPRETATION

The Washington State Board of Health (Board) offers American Sign Language and Spanish interpretation during our regular public meetings. We do this as a part of our work towards increasing language access.

We ask all speakers at Board meetings to follow this guidance to create an accessible meeting environment. If you have any questions or need guidance for presenting, please contact Board staff for support.

WHAT TO EXPECT DURING A BOARD MEETING

- You will receive a simplified version of this document at your seat on the day of the Board meeting.
- Board staff or interpreters may give you cues to slow down your pace. The cues may include:
  - Raising a paddle sign to signal you to slow down.
  - Making a brief verbal interruption asking you to slow down.

TIPS FOR SPEAKING AND PRESENTING DURING THE MEETING

We ask that you help us mitigate the need for interruptions by speaking at a comfortable pace. Our ASL and Spanish interpreters cannot deliver your message accurately if you speak too quickly.

- Take a breath after each sentence to give the interpreter time to deliver your message.
- If you are reading from a script, please be aware that you may read faster than you speak.
- To help the interpreters and audience identify you, state your name each time you begin talking.
- Wait until someone else finishes speaking before you speak. Interpreters can only choose one person to interpret at a time.
- Pause after introducing technical terms, proper nouns, dates, numbers, or figures to allow for interpretation.

TIPS FOR TECHNICAL TERMS

- We recommend including a pause after introducing technical terms, proper nouns, dates, numbers, or figures.
  - Example: *"This briefing will discuss rulemaking around newborn screening for Ornithine Transcarbamylase Deficiency (OTCD) [pause for interpretation, wait for cue from interpreter to continue], Chapter 246-650 WAC [pause for interpretation, wait for cue from interpreter to continue]."*
- After you introduce technical terms or proper nouns use their acronyms for the remainder of the introduction.
  - Example: *"For the remainder of this discussion, I will refer to this condition as OTCD."*
- If you are using visual materials (e.g., tables), incorporate descriptive language of the visual material.
  - Example: *"This is a table showing XXXX. And now, we'll look at this part of the table…"*

WASHINGTON STATE BOARD OF HEALTH

Minutes for School Environmental Health and Safety Rule Project
Technical Advisory Committee Meeting
March 19, 2025
Virtual Meeting
ASL (or CART)
Department of Health
111 Israel Road SE,
Tumwater, WA 98501
Town Center Two Room: 153
Virtual meeting: ZOOM Webinar

Technical Advisory Committee Members:

Online Participants
Patty Hayes, RN, MSN, Chair
Bailey Stanger, Benton Franklin Health District
Becky Doughty, Spokane Public Schools
Brian Buck, Lake Washington School District
Brian Freeman, Inchelum School District
Brook Wilkerson, School OPS
David Hammond, Washington Association of School Administrators (WASA)
Devon Kellogg, Washington State PTA (reside in Lake Washington SD)
Geoff Lawson, WAMOA and Auburn School District
Gina Yonts, Association of Washington School Principals
Jared Mason-Gere, Washington Education Association
Jeff Rogers, WAMOA and Auburn School District
Laura Peterson, Washington State PTA
Lauren Jenks, Washington State Department of Health
Morgan Powell, Office of Superintendent of Public Instruction (OSPI)
Nicole Daltoso, Evergreen Public Schools (Clark County)
Preet Singh, Bellingham Public School
Samantha Fogg, Washington State PTA (Seattle Public Schools)
Sandy Phillips, Spokane Regional Health District
Suzie Hanson, Washington Federation of Independent Schools
Tammy Allison, Washington Association of School Business Officials

Technical Advisory Committee members absent:
Anders Lindgren, School OPS
Dan Steele, Washington Association of School Administrators (WASA)
Doug Rich, Washington State Catholic Conference/Catholic Schools
Erin Hockaday, Benton Franklin Health District
Jacob Cook, Parent
Jaime Bodden, WSALPHO
Jessica Sankey, Bellingham Public School
Julie Salvi, Washington Education Association
Kate Espy, South Kitsap School District
Kellie Lacey, Richland School District
Kelly Cooper, Washington State Department of Health
Kelsey Greenough, Richland School District

Kenney Johnson, Lake Washington School District
Kevin Jacka, The Rural Alliance
Laurette Rasmussen, Whatcom County Health & Community Services
Nicole Roel, Washington Association of School Business Officials
Pam Schwartz, Washington State Catholic Conference/Catholic Schools
Randy Newman, OSPI
Richard Conley, The Rural Alliance
Roz Thompson, Association of Washington School Principals
Sandra Jarrard, Spokane Public Schools
Sharon Ricci, Washington Federation of Independent Schools
Steve Main, Spokane Regional Health District
Susan Baird-Joshi, Washington State PTA (reside in Lake Washington SD)
Ted Dehnke, Evergreen Public Schools (Clark County)
Tyler Muench, OSPI

Technical Advisory Committee staff present:
Andrew Kamali, Project Manager
Nina Helping, Policy Advisor
Marcus DeHart, Communications
Michelle Larson, Communications
Anna Burns, Communications
Mary Baechler, Community Outreach Coordinator
Crystal Ogle, Administrative Assistant

Guests and other participants:
Karen Langehough, FirstRule, Facilitator
Ali Boris, Department of Health

1. Introduction/Minutes Review

Patty Hayes, Committee Chair, welcomed committee members and convened the School Rule Technical Advisory Committee meeting at 8:31 a.m. Chair Hayes called for a discussion of the February 26, 2025, meeting minutes. There was no discussion and the minutes were filed.

2. Reminders

Karen Langehough, Facilitator, called on committee members to introduce themselves.

3. Objectives and Meeting Agreement

Facilitator Langehough reviewed the meeting objectives. The purpose is to finalize the language for showers, drinking fountains, and hand-washing sinks; review the updated fiscal analysis; develop an implementation recommendation; and prepare for the meeting with the Board on April 9, 2025.

Andrew Kamali, Project Manager, reviewed the timeline on the slide.

Facilitator Langehough reviewed the committee agreements for the meeting (materials on file) and emphasized the focus on the minimum specifications.

4. Revisiting Language

WAC 246-370-060 Showers and Restrooms

Facilitator Langehough introduced the revised language for showers:

Proposed Language

> *(1) When new installation or renovation of an existing shower or restroom facility is planned, school officials shall:*
> *(a) Provide at least one shower facility for grades nine and above for classes in physical education and for team sports that:*
> *(i) Meets the Federal Americans with Disabilities Act (ADA);*
> *(ii) Meets the requirements of the uniform plumbing code set forth in chapter 51-56 WAC;*
> *(iii) Is accessible for use during school hours and scheduled events;*

Lauren Jenks, Committee Member, explained that they focused the rule on one shower facility as the absolute minimum for grades nine through ten with physical education and team sports. It needs to be accessible during the day and after school and meet the Americans with Disabilities Act (ADA) requirements. Local health and K-12 guidance can work with schools for what is reasonable for additional numbers and activities.

Nicole Daltoso, Committee Member, thanked Member Jenks and asked about grades nine and above, and why not middle schools.

PM Kamali said the current rule is for grades nine and above. Historically, middle schools have had showers. While we want showers in middle schools, we think that's better covered in guidance.

Bailey Stanger, Committee Member, wondered if it should be one shower per gender, and more logistics and guidance.

Member Jenks said the K-12 guide will provide guidance, and we don't want people waiting in line. As for the gender-neutral showers, showers are primarily in locker rooms that are already gendered. If a shower is in a health room, it would be considered gender neutral and accessible to students.

Devon Kellogg, Committee Member, asked about wording on page 14. Were the rest of the requirements taken out?

Member Jenks said we are voting on the language on page 14. The slide is just a summary.

PM Kamali said certain requirements are in the Uniform Plumbing Code. The highlighted sections have been changed. We are voting on the language on the slide.

Member Jenks asked if the language we are voting on is in the packet.

PM Kamali said no, it's on the screen since it was finalized yesterday.

Chair Hayes responded to Member Kellogg's question, saying the items not being pulled forward are still required because we are now referring to the plumbing code.

Facilitator Langehough asked for any other clarifying questions.

Member Kellogg said page 14 references restrooms and asked if we are changing those sections.

PM Kamali said we will have additional voting slides today on items that were not finalized.

Member Jenks said we changed the section structure.

Facilitator Langehough said the section on Showers and Restrooms will become subsections 1 and 2. We are voting just on showers now.

Member Kellogg said that everything in yellow is being replaced. Is this (1)(b)?

PM Kamali said yes.

Revised language

> *(1) For new construction or alterations of an existing shower facility, school officials shall provide for grades nine and above with classes in physical education or team sports, at least one shower that:*
> *(a) Meets the Federal Americans with Disabilities Act (ADA);*
> *(b) Meets the requirements of the uniform plumbing code set forth in chapter 51-56 WAC; and*
> *(c) Is accessible for use during school hours and scheduled events;*

Voting Results

Fist	1	2	3	4	5
0	0	0	4	7	9

Facilitator Langehough announced a consensus approving the revised language.

WAC 246-370-050 General Building Requirements

Facilitator Langehough introduced the revised language for drinking fountains: referenced page 61, and in the lower right corner of our language, page 13. This is a new section for building requirements specific to drinking fountains.

Revised language

> *(X) Provide drinking fountains that are:*
> *(a) Not attached to handwashing sinks;*
> *(b) Not located in bathrooms;*
> *(c) Constructed with a nozzle that directs an arch of water to flow away from the nozzle;*
> *(d) Cleaned and sanitized daily, or more often as needed; and*
> *(e) Located above water impervious flooring.*

Member Jenks asked about the relationship between the highlighted content in the packets and what was on the screen.

PM Kamali said this would be an addition to the General Building requirements. The yellow indicates changes we made at the last meeting. We still aren't sure whether this is the appropriate section.

Tammy Allison, Committee Member, asked if the water filling station replaces the fountain.

Nina Helpling, Policy Advisor, said it just says drinking fountain. We need to research whether this should apply to both drinking fountains and filling stations.

Samantha Fogg, Committee Member, assumed these would be ADA compliant. Do we need to specify accessibility?

Member Jenks said this is what local health officials would inspect to and asked if we also want local health to focus on the plumbing code? If that is the case we would say yes, the ADA is included.

PM Kamali said that for drinking fountains, the plumbing code said 1 to 100, but it doesn't mention operation.

Member Stanger referred to drinking fountains attached to handwashing sinks.

PM Kamali said it's a health and safety issue with fountains attached to hand washing sinks. We are trying to say that we shouldn't use a drinking fountain if it's attached to a sink.

Brian Buck, Committee Member, said there are many bubblers in hand washing sinks in elementary schools.

Facilitator Langehough clarified that subsection (ii) is being called out opposed to all the other fixtures we clean every day.

Member Jenks asked Member Stanger if it was a problem to have drinking water close to a sink, expressing more concerns about specialized rooms with toxic chemicals or fountains adjacent to bathrooms. Members discussed which sinks might be at a higher risk.

Member Jenks suggested the language "no fountains should be in sinks with bathrooms or specialized rooms" to make sure we are at a minimum health and safety standard.

PM Kamali read the building code language regarding ADA, calling out the 50% number.

Facilitator Langehough referred to notes that recommend retrofitting old structures, but that it's not required.

Sandy Phillips, Committee Member, echoed Member Stanger's comments, saying having drinking fountains attached to a sink in a classroom might be a supervision consideration (children don't need to go to a hallway for a drink). In 2003, the language was revised to drinking fountains should not be attached to handwashing sinks, then it was revised.

Member Phillips favored taking it out. For cleaning, maybe clean the handle every day to prevent the transmission of diseases, but maybe not the nozzle.

Member Fogg said the sinks seem to be teacher dependent and observed a huge range of uses.

Gina Yonts, Committee Member, quoted Member Rodgers' suggestion, "recommended, not required," and pointed out the 2003 drinking faucet with hand washing. In many buildings remodeled in the 90s, custodians turned off fountains attached to sinks. In their region, many buildings have the water bottle filling stations and children have water bottles. We must be mindful of this purpose.

PM Kamali said we aren't requiring drinking fountains for new construction. That is dictated by the plumbing code. Don't attach drinking fountains to sinks in specialized rooms or other high-risk areas.

Chair Hayes agreed with Member Buck that (a)(ii) is too detailed. We should revise (b) so that we aren't requiring major revisions to sinks.

Facilitator Langehough asked if staff can make changes to the screen before voting.

Member Phillips confirmed that you can turn off the fountain without turning off the sink. To be consistent, use restrooms vs bathrooms.

Facilitator Langehough called for a vote on the language on the screen.

Revised language

> *(#) A school official shall:*
> *(a) Provide drinking fountains that are:*
> *(i) Constructed with a nozzle that directs an arc of water to flow away from the nozzle;*
> *(ii) Located above water impervious flooring.*
> *(b)Ensure that no drinking fountains are operable if:*
> *(i) Attached to handwashing sinks in a specialized room; or*
> *(ii) Located in restrooms.*

Voting Results

Fist	1	2	3	4	5
0	0	0	3	7	6

Facilitator Langehough announced the consensus for the language as shown on the screen.

WAC 246-370-050 General Building Requirements

Facilitator Langehough introduced revised language for handwashing sinks:

Revised language

> *(X) A school official will ensure that handwashing sinks are accessible where activities present a potential risk of microbiological or chemical contamination of the hands in any student spaces including, but not limited to:*
> *(a) Restrooms*
> *(b) Specialized rooms*
> *(c) Heath room*
> *(d) Food service*
> *(e) All elementary classrooms*

Discussion

Member Buck asked if handwashing sinks are required to be in all elementary classrooms if there are shared learning areas.

Member Daltoso agreed with Member Buck. The only classrooms with a handwashing sink are the pre-kindergarten and shared areas.

Member Jenks suggested that deleting the word “all” would not lose anything.

PM Kamali agreed that it might be OK to remove the word “All” or even delete subsection (e).

Suzie Hanson, Committee Member, agreed that the word “all” was not necessary.

Member Phillips said sinks are standard in public schools. They are not in private or parochial schools. Making them required might be a burden.

Chair Hayes thinks dropping (e) would be appropriate.

David Hammond, Committee Member, said they've constructed three elementary schools recently, and they all had sinks installed. Regular classrooms become specialized during the day since the art teacher may come by with supplies on a cart.

Laurette Rasmussen, Committee Member, reminded the committee that some schools have students eat lunch in classrooms, which would make accessible hand washing sinks important.

Member Jenks expanded on food and other activities that are different from a standard classroom.

Facilitator Langehough said we do have a definition on page 52 (page four of the proposed language section) regarding specialized rooms.

Member Kellogg asked about the highlighted sections of the language.

PM Kamali said the language voted on at the last meeting was highlighted, and the screen in the meeting today is new language, which would become a new subsection. So, this new language could potentially be section (9).

Facilitator Langehough asked about the duplicative language in section (7).

PM Kamali said today, we are specifying where handwashing sinks are required. The other language specifies how they are used and maintained.

Member Fogg agreed and suggested including guidance for supervising the handwashing. Microbiological or chemical contaminants language would be good in the guidance.

Facilitator Langehough asked for the language to be corrected before voting.

Member Jenks said we would be comfortable deleting (d).

Member Daltoso said the handwashing sinks will be in the nearest restroom (when discussing the food service area).

Member Hanson said it's good to have a sink in the health room.

Revised Language

> *(#) A school official shall ensure that handwashing sinks are accessible where activities present a potential risk of microbiological or chemical contamination of the hands in any student spaces, which may include, but are not limited to:*
> *(a) Restrooms*
> *(b) Specialized rooms*
> *(c) Health room*

Voting Results

Fist	1	2	3	4	5
0	0	0	1	9	9

Facilitator Langehough announced a consensus for the language on the screen.

5. Fiscal Analysis

Member Kellogg asked if they were going to revisit restrooms.

Facilitator Langehough said the committee would not revisit restrooms.

PM Kamali explained that they may adjust the lead-in sentence of the restroom section for clarity but won't change any of the content.

Facilitator Langehough asked the committee to review page 77. The purpose is to focus on questions about data or recommendations for clarity, not wordsmithing or editing. There are areas where we are not offering a cost analysis if it is not a new requirement.

PM Kamali added that a lot of the cost has come from information that committee members provided by surveys and from industry partners, and information that's available through state resources. If you see any miscalculations, please let us know, as we need to get this as accurate as possible. It's better to assume the higher end of the cost. Members will see ranges throughout and the cost per square foot because there's a significant difference in schools across the state. It's hard to say how much it's going to cost for a small school because it's not clearly defined. Breakdowns by square foot can apply to any facility type.

Member Hanson asked if the fiscal implications are referencing the cost of the rule or the cost of the changes to the rule.

PM Kamali confirmed that this represents the cost difference. Some new requirements would be the total cost because they didn't exist.

Member Hanson discussed hearing from the Department of Commerce (Commerce) that these rules are already in place and therefore there's no increase in costs. Member Hanson noted that it is inaccurate and wanted to clarify that these changes cost schools more money.

PM Kamali said that it would be inaccurate for the Commerce to say these rules are effective. We've amended some of the sections where we thought there would be conflict to prevent schools from going over their energy allotment from the Clean Buildings Performance Standards. Commerce will have some rulemaking, and we don't know what those changes will be. For our requirements, there will be changes and costs for schools to implement, but not in terms of the energy requirements. We've written this rule to comply with the energy code or we've made changes so that it will comply with the energy code requirements.

Member Allison asked whether any changes that are not funded will be required.

PM Kamali answered that there's a proviso in the state budget that new school environmental health and safety rules cannot be implemented until they are funded. After we finish the fiscal analysis, we will identify easy-to-implement, low-cost items that can go into effect while the Legislature figures out funding.

Member Hanson said that for private schools, these are unfunded mandates. Will compliance by private schools be required only after public schools are funded? Do private schools wait until the state funds private schools too and then it's ruled for the private schools?

PM Kamali replied that private schools do not get state funding, but there are still grants available. Compliance with the rule would likely align with when public schools receive the funding. That is when all schools would then need to work to comply.

Member Hanson replied that they didn't know of any grants that work for private schools. There are religious barriers to their schools receiving state funding, and the infrastructure of the schools doesn't typically have the administration to apply for large grants. They want to learn more or debunk that myth.

PM Kamali said we can investigate how grants could support our private school partners.

Chair Hayes said that this is an important point to discuss with the Board when we meet next month. These school rules have been around for many years. Schools have been working with local public health for many years. The new rule is still under suspension and has the language that PM Kamali referenced. The committee is recommending these changes, which creates the next version of a school rule for the Legislature to consider. We will be recommending implementation.

Chair Hayes felt that we lose track that there are rules that the system is working with right now. It's not the same across the state, but it's true for both schools and local public health. So just wanted to put that back on the record.

Member Hanson expressed their concern that adding the new rules and compliance issues will add more costs and financial burdens for private schools. It will increase confusion from other departments and from the Board itself.

Facilitator Langehough thanked Member Hanson for calling that out and discussed ways to view the fiscal analysis, the cost assumption section, and guidance, adding that there is a new requirement that the department must review and update the guide at least every five years.

PA Helpling discussed the difference between what was seen in January at the fiscal summit and what the committee is seeing today. The fiscal summit used an average. Here, it's the minimum and maximum based on the hours to do a task submitted by members.

Member Phillips said there was a time cost for the local health jurisdiction to participate in updating the guidance. Not all would participate, but many wanted to comment on it.

PM Kamali asked Member Phillips how much time was allocated from Spokane?

Member Phillips said they code for time and could check for that.

PA Helpling said that when they asked the Department of Health (Department) and the Office of Superintendent and Public Instruction (OSPI) for an estimate on updating the guidance, it might have been higher due to the time elapsed since the last time the guide was updated. They didn't know if it was a true representation.

PM Kamali said the last update took a lot of effort because it had been over 20 years since it had been updated. If it is being periodically updated on a five-year basis, the amount of time will probably be less.

Facilitator Langehough raised a question in the chat: What does "Department" represent? They asked to edit it for clarity.

PM Kamali said that our standard language is to refer to the Department of Health as the Department. That applies even in the rule language. We could add a line that says "Department" means Department of Health.

Member Phillips discussed PM Kamali's comment on the time to update the guide, adding that it could really vary on time, depending on if it's just correcting the regulations that are referenced, such as all the Department of Labor and Industries (L&I) regulations. Hopefully, with regular updates, that won't take as much time.

Action Items

- Look into support for private school partners. Are there grants for private schools to fund the rule?

- Get info from Member Phillips on their time allocated for their local health jurisdiction cost to participate in the guidance updates.
- Add a line that "Department" means "Department of Health."

Break from 10:35 to 10:45 a.m.

6. Fiscal Analysis

Site Assessment

Facilitator Langehough welcomed committee members back and directed them to the site assessment section of the fiscal analysis.

PA Helpling explained that committee members would see the same minimum and maximum cost matrices as before and summed up the changes recently made to it. Some local health jurisdictions require cost recovery or have a fee, and others do not. If a jurisdiction recovers costs, a fee will be charged to the school, and that will be an expense. They explained that committee members would see some differences in labor costs because of that.

Member Hanson asked for clarification. What they heard is that some local health offices don't charge for site reviews, which can cost thousands of dollars. They know that private schools pay fees and wondered if public schools also pay these fees.

PM Kamali explained that some jurisdictions require cost recovery and must charge fees, but others may use funds from other sources to subsidize fees. It varies from health office to health office. They said that both public and private schools are assessed fees when fees are assessed.

Member Hanson asked who required the recouping of fees.

PM Kamali said that the elected officials who make up the local jurisdiction govern cost recovery.

Member Buck expressed concern about the inconsistency among jurisdictions when charging schools and believes we should recommend fully funding site assessments so schools are not charged.

Chair Hayes thanked Member Buck for the comment and believes it's an important point to include in the report. The issue is within the state constitution's home rule, which gives authority and power to create these differences. Chair Hayes recommended that the committee bring this to the Board's attention at the meeting next month to flag the issue.

Member Rasmussen agreed that inconsistencies create issues, and mentioning this in the report and to the Board would be valuable. They explained that in their jurisdiction, funding didn't exist for a school assessment program for 30 to 40 years, and they didn't want to charge schools. Recently, their jurisdiction received foundational public health dollars to start a program, but they are uncertain that funding will continue.

Member Hanson wondered what the Board's opinion of the matter was and added that they don't have an issue with districts having autonomy.

Chair Hayes explained that the Board has not discussed this topic in detail and added that the next meeting will be a good opportunity to bring it up. They reminded the committee members that the voices in the field, from organizations they represent, can influence legislative change and is how the current funding occurred, through foundational public health dollars. This fund is at risk, so it will

be very important to be clear on what is important to fund, how something is funded, and where that money goes.

Member Rogers acknowledged that this may not be the area to discuss it, but they wanted to highlight the inconsistencies in billing from local health offices for services. Many times, the invoices are missing school names or are labeled incorrectly under food service when it was a site assessment, etc.

Member Phillips provided clarification that a site assessment is a phase 1 environmental assessment of the property and does not include routine inspections.

Member Hanson called attention to some confusion that can be made between a site inspection and a regular health and safety inspection. Private schools may not be on the local health jurisdiction's radar for any funding that could be applied.

Facilitator Langehough reminded committee members that the definition of site assessment has been updated, captured, and clarified in this work.

Member Stanger explained that site assessments can be rather technical and require education and training. Some jurisdictions may have more experienced staff and could do them faster than others. Member Stanger wondered how the number of hours were calculated for the site assessment.

PA Helpling explained that costs used were professional costs from companies within the state of Washington that were certified to complete phase 1 or 2 site assessments. Additional hours came from committee survey responses. Costs for local health jurisdictions and schools were based on how many additional hours there would be between how the rule is written now for completing the work.

Facilitator Langehough asked for additional questions or comments on the fiscal analysis about site assessment.

Committee members had no additional questions or comments.

Construction Plan Review for New Alternations and Portables

Facilitator Langehough asked committee members to move to the construction plan review for new alterations and portables.

PA Helpling explained that the same concept and matrix were used and called out a few zeros committee members would see. They explained that local health jurisdictions within the committee and outside of the committee confirmed there would be no additional labor hours needed to review based on the rule as written.

Facilitator Langehough asked for questions or comments.

Committee members had no additional questions or comments.

Routine Inspections

Facilitator Langehough asked committee members to move to routine inspections.

PA Helpling explained that the same concept and matrix were used in this section. They could not recall what was new in this section compared to the last time the committee viewed the document.

PM Kamali reminded committee members that school official training is optional.

Member Yonts clarified that if a district wanted to train within its own system, they believed that to be a one-time cost.

PM Kamali explained that the local health jurisdiction provides required training once a year.

Member Phillips confirmed that it is an annual training session that a designee, or more if they choose, attends. They added that the training is three hours. It's recorded as well. Updates are reviewed at the annual training.

Member Daltoso asked if a school official has completed training, will the school still be charged for the review.

PM Kamali answered that it depends on the local health jurisdiction. The school official is meant to supplement, not replace, the local health inspection. There is still the requirement to have the jurisdiction complete the inspection every three to five years.

Member Phillips added that even in years that schools do their own inspection, jurisdictions review the reports and get back to the school, so there is still a time component for each year with that.

Member Hanson commented that there is a time component on the school's side for self-inspections as well.

Member Phillips explained that the reason jurisdictions began self-inspections was for schools to keep their costs down. A school's cost for self-inspection would be less than the local health offices fees.

Member Hanson agreed that a yearly inspection to that degree wouldn't be good for anyone and that there is not enough time to get issues called out and completed in that time.

General Building Requirements

Facilitator Langehough heard no further comments or questions and asked committee members to move to the next section.

PA Helpling explained that they didn't have a cost for vacuum breakers in this section and that would be the only new cost associated with this section.

Brian Freeman, Committee Member, commented that they believe vacuum breakers are already in the building code.

Member Buck and Member Hammond agreed that they believe vacuum breakers are in the current code.

Member Phillips was unsure that it was in code for all types of sinks. They believed it would be something to investigate.

PM Kamali added that previously, it was only housekeeping sinks being referred to and explained that the current language is to be inclusive of any faucet you can connect a hose to, so they agreed that they are uncertain if it's in the code for all types of these sinks.

PA Helpling explained that this is why it's added to language. When speaking with local health jurisdictions, they shared when they inspect, they find hoses attached to sinks and there is concern

for cross connection back flow. Backflowing into your public water system is dangerous and not always caught.

Member Rasmussen shared that there may be two different things being discussed here. Cross connection would be for premises isolation, something from the main water system where a backflow device at the connection would be needed. Then, there are interior cross connections from sinks and faucets, which may require a vacuum breaker. Member Rasmussen also wondered what code this was covered in. Is it in the plumbing code?

PM Kamali clarified that the question is if it is covered in the code and added that staff have been unable to find this specific requirement. If it's in code, then there is no new cost.

Chair Hayes reminded committee members that if it's included in a rule elsewhere, there is no additional cost to schools or associated with its inclusion in this rule.

PM Kamali confirmed that the next step would be for staff to look to see if it's covered in another code. If it's covered, the cost is zero. If it's not, then this cost will be presented to the Legislature.

Facilitator Langehough confirmed with staff that the showers and restrooms section is still in process and will be updated based on today's conversation.

Indoor Air Quality and Ventilation

Facilitator Langehough asked members to move to indoor air quality.

PA Helpling reviewed the summary of changes to the section and noted that hourly estimates were obtained via surveys that the committee members, Department, and subject matter experts had completed. Some areas have a square footage cost, so this will be determined by the school size.

Member Hanson asked why the minimum radon plan cost was zero.

PA Helpling explained that some schools have already developed a radon plan. There will be no additional cost to them. The same goes for an integrated pest management plan.

Member Kellogg noticed that the bulk of labor cost for air quality is under the pest management plan and pointed out that pest management is an issue that goes beyond air quality. Member Kellogg was concerned it reflected a disproportionate cost for air quality and could delay the implementation of it due to the increased, misperceived cost. They suggested placing pest management in another section.

Member Allison believed that the monthly contracts with pest management companies for every school and every facility caused the high costs.

Member Kellogg clarified that they are not concerned about the cost itself but that the cost is documented under air quality, which may delay implementation because this section's cost is higher than other sections. They believe pest management to be an outside cost, so it should be separated out.

Facilitator Langehough stated that the cost analysis is not intended to change the structure of the section.

Member Allison pointed out that pests do not stay outside. Rather, they come inside and make people sick and the air unhealthy.

Member Hanson suggested prioritization within that section to prevent delays.

PM Kamali told committee members that the report can show that there are some extreme and outlying costs listed in the analysis, and that may help legislators understand the costs.

Member Buck wanted to clarify that the test and balance cost was 0.81 per square foot for every building every 15 years and wanted to know how the money would be asked for. Would it be parsed out every year or funded during year 15?

PM Kamali explained that the plan is to provide examples in the report. OSPI can provide an average square footage of a school, but actual school districts can also provide data.

Member Buck added that modular buildings should be another consideration.

PA Helpling explained that the recommendation came from the engineer. If airflow needs to be increased, it would be a one-time cost.

Member Yonts asked how many square feet were in a typical school building because 0.81 alone doesn't scare them as a cost.

Member Buck estimated a standard school building would be 300,000 square feet.

Member Yonts believed that to be a large number and asked if there could be tables to highlight that.

PM Kamali explained that the staff plan to add tables but have not had the chance to complete them for this meeting. There will be energy savings with these updates, not that they would completely offset costs, but they would create savings. Staff plans to set examples for small, large, and medium-sized schools in the report, so 0.81 per square foot doesn't look misleading.

Member Yonts asked if this was for all schools or just new builds.

PM Kamali said it's for all schools that have a ventilation system. If there is no ventilation system, then a school wouldn't be doing it. If a new school is built, it would be to new building and energy codes which cover this. Fifteen years was picked also because it is the halfway point for the 30-year cycle in School Construction Assistance Program funding.

Temperature

Facilitator Langehough asked committee members to review the temperature section.

PA Helpling explained that the numbers are the same supplied in the January meeting.

Facilitator Langehough asked for any questions or comments.

Committee members had no additional questions or comments.

Lunch Break from 12:00 to 12:45 p.m.

Injury Prevention Section

PA Helpling explained changes and reviewed the costs for the injury prevention section.

Member Buck asked if this is like existing requirements in the building code. Is this for the fall protection guards or the local jurisdiction inspecting it?

PA Helpling answered that this is the cost to install a new guard.

Member Buck asked if this needs to be in the cost analysis.

PM Kamali asked PA Helpling if this was required under previous iterations of the building code. This is based on the 2024 one.

PA Helpling responded that they would have to review the building code.

PM Kamali said there would be a cost if there were no requirements in the previous iterations or if there were different requirements. But if these requirements haven't changed, there wouldn't be a cost. We can verify that by looking back at previous iterations of the building code.

Member Buck said the building code changes all the time, and you're not required to retrofit every building whenever it changes. They assumed that was the case still.

Member Feeman described construction in the mid-eighties when 30 inches was the height required for fall protection. Old school buildings with gyms that have a stage usually accommodate the 30 inches by having fall protection so that they can still see the stage. Schools are already dealing with this.

PM Kamali responded that the actions here are for when fall-protection guards were integrated into the building code. If it was any time after 1980, we should probably keep this because there might be some facilities that don't have that for the cost piece.

Facilitator Langehough reviewed the one-time annual estimated cost for chemical cleaning storage and opened it up for questions.

Member Stanger asked whether the chemical cleaning and supplies also applied to science classroom chemicals and if this included disposal costs.

Facilitator Langehough asked Member Stanger whether they thought we needed to include that one-time cost for disposal.

Member Stanger said yes.

PA Helpling said that this is just to do the initial chemical inventory and does not include any disposal costs.

Facilitator Langehough asked if we need to add it.

Member Freeman asked Member Daltoso if this was an annual inventory task.

Member Daltoso said that many school districts have an annual inventory that they require their schools to update annually. As far as disposal goes, it would be so wide across school districts that it would be difficult to identify and include here.

Member Rogers recommended that schools take inventory annually, but it should also follow the curriculum. If a chemical is not in the curriculum, it shouldn't be in the school.

Member Rasmussen agreed with Member Rogers. Not every school has a current inventory and wished they had thought about this earlier when discussing a chemical hygiene plan.

Facilitator Langehough said this might be something for a future iteration.

Member Phillips added that if local health jurisdictions are starting new school programs, then they would likely identify chemicals that shouldn't be in the classrooms. It might be worth considering adding the potential disposal costs.

Member Rasmussen wanted to reiterate what Member Phillips said. Member Rasmussen suggested reaching out to the Department of Ecology for assistance with chemical disposal costs.

Member Rogers discussed how chemical disposal for schools is more complicated. It can cost twice as much to dispose of chemicals than to purchase them.

Chair Hayes said this cost benefit analysis needs to include costs that are new because of the rule. The rule isn't creating a disposal requirement that isn't already present. The cost of disposing of chemicals is high, but still unsure whether we need to include it here.

Facilitator Langehough summarized that the cost varies and is high but would not be a net-new cost for the fiscal analysis.

Facilitator Langehough moved to the final cost for this section, the animal safety plan development, and asked for comments and questions.

Member Yonts asked if this is talking about pest animals or service animals.

Facilitator Langehough said we do have specific pest control in another section. This section is about all other animals allowed on school premises.

Member Yonts said that building principles deal with Individualized Education Program (IEPs) and 504s that include pets that come to school to provide support services. If we agreed to the IEP, would we be on the hook to pay a one-time cost of $16,000?

PA Helpling clarified that these numbers reflect the committee input from the January meeting. We had one person say that it would take 120 hours to develop the Animal Safety Plan. It was an outlier, but we are including it to capture all the costs that were supplied to us.

PM Kamali further explained that this plan focuses on mitigating injury and the spread of disease if a school allows animals other than service animals.

Member Rasmussen discussed having a hard time thinking that it would take 120 hours. This could be included in a template.

PM Kamali said the Department is planning a template for an animal safety plan.

Ali Boris, Subject Matter Expert (SME), confirmed that such a plan was in the works.

Member Freeman asked if this includes animals that are dissected and fishing.

PM Kamali responded that the dissection of animals may not be included here because they are not living and tend to be preserved. If it's not at a school, then it does not fall under these regulations.

Member Phillips mentioned that there is guidance available from the National Association of Public Health Veterinarians for having animals in schools.

Imminent Health Hazards Procedures

PA Helpling reviewed the costs for imminent health hazard procedures. These are new and were not included in the January meeting.

Committee members had no additional questions or comments.

Playgrounds

PA Helpling reviewed the costs for playgrounds. We did an informal survey that had mixed reviews. Some said the playground inspection would be part of the routine inspection, and some said they charge separately for a playground inspection. PA Helpling asked the local health officers on the call if they do playground inspections when it's not a new construction and if so, how you charge for the inspection.

Member Rasmussen said they do a pre-playing inspection, but that is included in the plan review fee.

Member Stanger said they also charge for pre-playing inspections for playgrounds. If that playground isn't part of the new construction of the school, we just do it at the same time as the rest of the school and charge an hourly fee. We also do routine inspections of the playground.

PA Helpling asked Member Stanger if the fee is $100 per hour if it is just the playground.

Member Stanger said yes, we charge the same flat rate for any pre-occupancy review.

Member Phillips said we do that as well. We charge an hourly fee that is currently $180 per hour. We also inspect playgrounds as part of the routine inspection, and that is included in the fees for the school inspection.

Member Daltoso discussed Clark County's fee rates for a review. For just adding playground elements, they have always gone through the modification process and then subsequentially had to get an inspection.

Member Stanger clarified that they charge a flat rate of $200 for pre-occupancy, but they do charge separately for the plan review.

Specialized Rooms

PA Helpling provided a summary of new changes in the Specialized Rooms section.

PM Kamali asked Member Buck if the connection fee applies to emergency showers.

Member Buck said they would have to check on that.

PM Kamali noted they would follow up with Member Buck.

Variances and Emergency Waivers

PA Helpling provided a summary of the Variances and Emergency Waiver section and the changes.

Member Kellogg asked about a previous section. For the Indoor Air Quality and Pest Management plan, is the estimated cost just for the plan?

Facilitator Langehough suggested following up on this after the fiscal analysis.

Member Kellogg noted that the previous rule reads, “shall be free of insects and rodents,” so the cost should only capture the plan and not the implementation.

Member Freeman asked if you can get a variance with the current rule.

PM Kamali said, technically, yes, but that variance request needs to come to the Board. We are pushing it back down to the local level.

Member Freeman said that would move the cost to the local health jurisdiction.

PM Kamali said the Board did incur the costs but delays due to capacity would also add costs.

Member Freeman said the new rule seems more efficient and will save the district's money.

PM Kamali responded that it's shifting the policy procedures and cost structures to the local health. Not all local health jurisdictions will charge for this, so there may not be any additional costs.

Member Freeman asked if the state charges for this.

PM Kamali said no, the state doesn’t charge. But it wasn’t a traditional variance; it was an exemption, which is structurally a little different from a variance.

7. Implementation Discussion

Facilitator Langehough introduced the next section and framed the context for the discussion. Part of the proviso for this committee is to make recommendations to the Board for implementation strategies. Facilitator Langehough discussed how the team is driving towards multiple recommendations based on feedback from the committee members in the previous meeting. They asked committee members to focus on both quick wins and priorities that continue to be important for future implementation.

Chair Hayes discussed preparing the Board to consider how to make recommendations to the Legislature for phased rule implementation. Chair Hayes asked the committee to think about those first-go strategies schools could implement as we continue to seek funding for those that might be extremely important. They suggested the committee reframe their thinking on how these potentially parallel recommendations or phased recommendations would go and the message to the Legislature that pure health and safety is how we came to a consensus. The message should include the complexity of implementing the rule. We recommend looking at it from this perspective.

Facilitator Langehough reviewed the priority ranking table and opened it up for discussion.

Member Freeman discussed looking at this table from an inverse perspective. The most expensive things would be indoor air quality, temperature, and showers and restrooms, with that being the cheapest of those three. They agreed that air quality needs to be prioritized but the financial resources of Washington are not being prioritized. If the implementation of those three items is high, the Legislature will not approve it because they are not funding it at the level to make it happen in a reasonable period.

Member Hanson appreciated Member Freeman's comments. If they were to prioritize it, we would be in trouble for not being able to reach standards as quickly as you would be able to if they were to fund it. They asked Member Freeman if they had any sense of how long it would take to feel confident that we’d done due diligence on that issue.

Member Freeman responded that at the rate we are going with small school districts, we are years away from meeting the needs of indoor air quality and temperature. For those districts over a thousand, it would require passing a bond. It's a structural issue of the state of Washington and the priority is not there.

Member Kellogg said the existing rule already has temperature, air quality, and pest management requirements. The current rule is very vague. We are putting specifics on it, but the specifics fall into the category of making a plan. The only cost we are incurring is the costs for those plans that will help schools mitigate different circumstances. They are leaning towards prioritizing those things to navigate those implementation or cost problems.

Facilitator Langehough clarified that we are looking at the new component of the rule and the new cost we just outlined. We are not changing the health benefit priority and when we talk about costs and implementation we are talking about the new element.

Member Rogers said if you look at the K-12 safety guide, playgrounds have the least number of requirements. There is nothing in there that says how long the equipment is good for other than maintaining it. Playgrounds are used by the community and public every day and that's what you must look at, what is utilized every day.

Member Fogg said we haven't talked about how this has a broad public health impact, how many people are interacting in these spaces, and how that impacts how they interact with the general population. We are telling people they must send their child into these spaces, and their public health impact is then spread to the broader state. We have not framed it this way with the Legislature. Member Fogg discussed how we have been asked to determine what is necessary for public health and in our schools to keep the people in them from being harmed by being in those environments. But, also recognizing that they do want something to compel the state to provide the funding to get the improvements that we need. Schools are being told to figure it out when it's mathematically impossible to figure out their budgets.

Member Allison thanked Member Fogg for bringing up the cost and legislation. We can create a plan for indoor air quality, but implementing it is when costs start getting higher. It would be great if the Legislature funds what we ask, but they have not done so yet.

Facilitator Langehough agreed that it is a challenge to shift that mindset. The purpose of this exercise is to be able to intentionally share with the Board how this group sees the prioritization of the new to be implemented and funded. As difficult as that is, we must put the current funding request off to the side and think in the perfect scenario, what do we recommend.

Chair Hayes thanked Member Allison and Member Fogg for their comments. Chair Hayes offered several examples of how we could frame this to the Legislature. We could recommend that the planning phase of each of these elements move forward first. Then the implementation piece would be contingent on funding with the current recommendation. We could then say that the pieces around the relationship building between local public health and the schools could also then be implemented in the areas where local public health typically already has a program or partial program than implementing it when it did. We don't have to stick to this list, we could subdivide it. Chair Hayes will discuss with staff how we can create a visual that crosswalks this list with costs in some way.

Member Kellogg said we have opportunities right now to advocate for funding that comes from the Climate Commitment Act for some of these things. We should call out that opportunity. Additionally, there are tax credits from the federal government for a lot of clean energy projects that could be used to help schools and all non-profits.

Chair Hayes responded that they are unsure about putting those kinds of items in the report. They don't want to set expectations for the Legislature that allow them not to act. We have had a conversation on tax credits in the past that made it clear that they are not a strategy that all schools can use. The report needs to prioritize competing expectations. It needs to indicate where we can move forward and what you need. Then conversation around funding will be lobbying strategies that your organizations could use.

Member Daltoso recommended their low-cost, easy-implementation recommendation list. From lowest to highest, they recommended: site assessment, construction plan review, general building requirements, imminent health hazard, injury prevention, routine inspection, specialized rooms, playgrounds, showers and restrooms, temperature, and indoor air quality/ventilation.

Facilitator Langehough asked to focus on the first five and clarified the order of what would be the least cost and easiest to implement.

Member Daltoso said yes.

Facilitator Langehough asked staff to make the edits to the table on screen. This would be a recommendation that the first five (site assessment, construction plan review, general building requirements, and imminent health hazard) would have a lower cost and be easier to implement as another way to look at the priority ranking.

Chair Hayes thanked Member Daltoso and offered a different way of looking at it. We don't have to sub-prioritize these. We should talk about these five or including routine inspection as that first strategy with local health and see how the committee feels about this.

Member Kellogg asked why temperature was near the bottom.

Member Daltoso responded that they were trying to consider the schools that currently don't have air conditioning or struggle with their heating systems. They were trying to consider the complexity of it.

Facilitator Langehough asked if Member Kellogg was looking at the temperature section as developing a readiness plan which would be a low-cost, easy implementation category.

Member Kellogg said that the rule we are proposing only changes that we have a plan if it goes above or below temperatures. Some of these plans for air quality will help schools navigate those problems at a low cost.

Chair Hayes asked staff if they could quickly code the items that have a planning section. One of the things we could do is support these first five and then the second would be anything that requires planning to move forward and then address the implementation later.

Board staff made updates to the table on screen.

Member Jenks said this looks like a great list and asked about routine inspections. Is there a way to start that? That could help the school prioritize what needs to be done next or help with some of these plans. This approach would be a meet-and-greet with local health and schools without taking punitive measures.

Member Stanger said there is language in the indoor air quality section about ensuring the implementation of a written indoor air quality plan within five years of the effective date. Does this mean, when we say we want the indoor air quality plan next year, does that automatically set a timer for the implementation?

PM Kamali said we could always delay when a section becomes effective. If we were only to make the development of the plan a requirement, then that five years would not start. If we make the whole section effective then that five-year countdown would start.

Member Phillips added to what Member Jenks said and discussed their past inspection report and their priorities.

Member Hanson asked about the five years on the implementation of the indoor air quality plan. They didn't remember putting a time limit on that and do not feel it is a lot of time.

PM Kamali said the intent was to say once you get the funding or the section is implemented, you have an additional five years to develop and implement the plan to give schools time to work on it.

Member Hanson said the language was confusing.

Facilitator Langehough suggest Chair Hayes' recommendation about starting with the plans and building relationships as the first order of priority. The items in yellow on the screen would be the ones that plans could be in development. The second tier to that while we work on funding could be the additional steps within those same items.

Chair Hayes summarized the table. We are recommending two strategies. Number one, there are five items in the column that both develop relationships with local health and are also low cost that the committee could recommend as a first go strategy. Also, we support moving forward with planning, which would also implicate injury prevention, because that's in both columns. We can do both things without segmenting them.

PM Kamali said the staff recommended three phases. Phase one is planning, phase two is inspection, and phase three is implementation. Or something along those lines.

Chair Hayes asked committee members to vet that categorization. The title of phase two might need to be changed.

Member Freeman said they think site assessment is the same thing as a plan, it's just a plan review. So, that would be reasonable.

Member Daltoso asked staff to repeat the order.

PM Kamali elaborated that phase one is plans and plan review, phase two is inspection (local health officers establishing programs and building relationships), and phase three is when everything gets implemented.

Facilitator Langehough suggested that phase two focus on relationship building.

Member Daltoso said they think this is a great idea.

Board staff updated the columns on the table to reflect the discussion.

Member Daltoso asked about the table on the screen. The highlighted sections are everything for a plan review, correct? Can we move the stars on the table to reflect this?

The Board staff updated the table.

Member Jenks said they think of inspection and plan review together because they are responsibilities of local health. We could start early to build that relationship. Planning and plan review are different.

Member Hanson asked how this works on a sequential timeline.

Chair Hayes said they are thinking about presenting the implementation recommendation to the Board so to get the Board to think about how to put these in some sort of recommendation to the Legislature. If they lift the bar on phase one of implementation next legislative session, then the following year you would see local public health and these plans starting all these phase one activities across the state.

Member Rasmussen suggested moving playgrounds under phase two.

Member Stanger said that from a local health jurisdiction perspective, they understand where we are coming from, but it almost seems backwards. We would want to do relationship building first and help the schools identify what the plan review is.

Facilitator Langehough asked if they are suggesting phase one be relationship building and plan, then phase two would be plan review and inspection.

Member Stanger said yes and provided additional context.

Member Hanson said that new schools must have plan reviews. We already said that the local health jurisdiction must be part of that and must be a partner early on. For older schools that have been around for a while, local health jurisdictions don't have the infrastructure to offer relationship building on the level that is being described for all the schools all the time.

Chair Hayes said Member Hanson identified the issue they see with the title of the column. Phase one is the Department developing the templates on all the plans and schools finding out what plans they need to start developing. Plan review with the relationship building is phase two. We need for those sections that have a plan and then an implementation separately to have a star in the last column in the table on screen.

Member Jenks said they are hearing that there is start-up time for local health as well. As we put together that guidance, it would be helpful to hear from local health what they are seeing in schools. Start inspections in the places that aren't doing them as soon as possible so we can all be on the same page.

Facilitator Langehough said this may be as far as we can get today and suggested taking a break.

Afternoon Break from 2:50 to 3:00 p.m.

8. Board Meeting Prep

Chair Hayes thanked everyone for the previous conversation and commended Member Daltoso for helping move the discussion forward.

Facilitator Langehough said that the committee would prepare for the Board meeting on April 9 next.

PM Kamali said that on April 9, the committee will join the Board for a joint in-person meeting at Cedarbrook Lodge in Seatac. The joint session begins at 1:10, and we will have 170 minutes to review our work, share recommendations, and support Board action.

Member Allison asked if there would be name plates.

PM Kamali said yes. We will set up during lunch.

Member Jenks asked if the questions would be about the flow or just logistics.

PM Kamali said we will talk about logistics.

Member Jenks asked if this we be different from our committee meetings or regular Board meetings.

PM Kamali said that this will be the committee joining the Board meeting. We'll have the turtle there as a reminder and language interpretation. Facilitator Langehough will facilitate, which is not a normal Board process. The minutes will not be as detailed as a committee meeting. This is a discussion with the Board to rely on what the committee has done up to this point.

Facilitator Langehough asked PM Kamali to share the flow of information.

PM Kamali encouraged committee members to join the Board for lunch. Afterward, the joint discussion will begin with introductions, followed by reflections on the process and discussion over the four critical sections.

Facilitator Langehough said that after reflections, we'll go into prioritization, our recommended implementation strategy, and fiscal analysis. We'll discuss what we need from the Board and request the Board to accept the work of the committee.

Chair Hayes shared Board protocols and noted that we will submit a memo with action items. After the introductions, Facilitator Langehough will guide the discussion with the committee. Committee members should share examples of how this rule will work in their schools and how this rule helps schools in their role. Focus on how we built the rule to be flexible for schools and local health. We'll cover what our report will contain and why this rule is unique and important.

PM Kamali said we'll move from a high-level overview into a grounding experience.

Member Jenks asked what the possible outcomes of this group might be. Is it possible they will approve it or say that we need to do more work?

Chair Hayes said that the Board will be fully informed and will approve us going forward. Hopefully, the Board will help identify the next steps and what to expect as part of the process.

Chair Hayes said we have this big step to present the report to legislators, and we will rely on organizations to show up to help move this forward. There will be a large time gap. The legislators must have a hearing, and that might not happen for a while. The committee will need to stay informed about when that hearing might happen. We will need to figure out how to keep members informed.

PM Kamali said we need to remember our committee agreement that we came to a consensus on and agreed to support each other throughout this process. Are there any specific items that you think we should highlight to the Board?

Chair Hayes said it's important for the Board to understand the lack of consistency throughout local health. Maybe Member Jenks and local health officers can work on a strategy about how they want to talk about that. The school partners can talk about the difficulties of the local health jurisdiction not being consistent from county to county. This is our chance to put this on record.

Member Kellogg asked if committee members will have an opportunity to review the environmental justice assessment.

PM Kamali said that the assessment should be finished by the April meeting. We are currently cleaning it up. If it is not done by April, the committee will get to see it in May.

Member Allison asked if we should bring up fiscal impacts.

Chair Hayes said absolutely. This is important because it affects implementation. This will be on record, so this is the time to bring up the concerns.

Member Rogers asked if we should bring up unfunded mandates—trying to adhere to the health and safety rule when it's not funded. Since 2003, we have not been able to update any of these requirements. We still have many unfunded mandates.

Chair Hayes said that hopefully OSPI will be at the table. This is the time to speak about the things that are unfunded so that the Board understands that there are other unfunded mandates and this rule does not become just another one.

Member Kellogg asked if we do not have time to review the environmental justice assessment, will we return to Group B water systems?

PM Kamali said we are in the process of looking into the list of schools that might be Group B systems.

Facilitator Langehough asked if it would be a topic for April 9.

PM Kamali said they were not sure if the assessment would be done by then.

Member Kellogg asked if we should bring it up as a concern at the meeting.

PM Kamali said yes if there is a concern around local environmental health and safety.

Member Kellogg said that in the indoor air quality section, we identified pest management as an expensive item. Is there a risk that pest management might delay all elements of indoor air quality, including the easy-to-implement pieces?

PM Kamali said we could break the indoor air quality section into smaller sections for implementation based on cost.

Facilitator Langehough asked for other topics.

PM Kamali invited members to email anyone on the Board team if they have additional questions.

Member Jenks said they lost track of the items that need to be in the report.

PM Kamali said we plan to create an outline of the report that we will share with the committee.

Facilitator Langehough suggested that members could see the list of the items so that they can comment.

PM Kamali said we will provide the outline with the April 9 materials.

Member Fogg asked how much the Board knows about the things that we have been struggling with. Do they need more context?

Chair Hayes said we have had multiple briefings with Board Members over the past several months. We have been trying to convey the struggles that we have had at each meeting. Each committee member can share a story about where they come from. The newest Board Member is

Peter Browning. Board Member Browning is the former director of the Skagit County Health Department and their wife is a former school superintendent, which provides additional perspective. Bring your stories, something to share at a high level.

PM Kamali added that Board Member Browning was part of the first rule process in 2004. We have been working with the Board to keep them grounded in the process and to give them an in-depth look at the work. They have the foundation, but they will benefit from the lived experience that you all have to share.

PM Kamali shared that the Board meetings are a little more formal than business casual—not formal like a business suit or similar. The Board meeting is public.

Member Allison asked that since this is a public meeting, will there be a public comment period? Will we be limited to two minutes?

Chair Hayes said no. Public comments will be in the morning. The afternoon will be a dialogue and conversation.

Member Freeman described their experience in formal board meetings. Do we need to direct questions and comments to the Chair or can we ask Board Members directly?

Chair Hayes said that Facilitator Langehough will facilitate and call on people to speak, but it's not as formal as what Member Freeman described.

Facilitator Langehough said that we are informal and call people by their first names. How do you address Board Members?

Chair Hayes encouraged members to keep it informal and use their first names to make it conversational.

PM Kamali said that staff are used to using "Member *Last Name*", but we should use the first names of the committee.

PM Kamali asked if there were any other questions about this meeting.

Member Daltoso asked if we would get a reminder of the questions we will be asked and the topics to discuss.

PM Kamali said that we can do that. How far in advance would you need it?

Member Daltoso said that schools are on spring break, so sooner rather than later.

Facilitator Langehough said that it gives more time for you to think about the story you want to tell.

PM Kamali said we will send a reminder next week. Board materials go out on April 2.

Member Allison asked how many committee members will be present.

PM Kamali said we will have 16 in person. We will have six Board Members, an Assistant Attorney General, the Board Executive Director, PM Kamali, and Facilitator Langehough at the table. That's 26 or 27 people in total.

9. Recap/Next Steps

PM Kamali made an action item to send a reminder to the committee and send the Board materials the week after that. There may be some emails about the fiscal analysis, so look out for those.

PM Kamali thanked everyone for all the hard work to get something this complex done and as quickly as we have. It has been an honor to do this with everyone.

Member Kellogg said that the staff were very professional and compassionate, and they appreciated that.

Chair Hayes provided deep appreciation for this opportunity and looked forward to seeing everyone at the April Board meeting.

ADJOURNMENT

Chair Hayes adjourned the meeting at 3:52 p.m.

WASHINGTON STATE BOARD OF HEALTH

_____
Patty Hayes, Chair

WASHINGTON STATE BOARD OF HEALTH

School Environmental Health and Safety Rule Project 2024 - 2025

Technical Advisory Committee (TAC) Charter
Start Date: August 1, 2024 **End Date**: June 30, 2025
Members: See TAC Membership Addendum A

Objective

To review and update the rule for school environmental health and safety. The State Board of Health (Board) and the Department of Health (Department) shall conduct the review with a multi-disciplinary technical advisory committee (TAC). The proposed new rule shall establish the minimum statewide health and safety standards for schools. The TAC will help the Board consider the size of school districts, regional cost differences, the age of the schools, the feasibility of implementing the proposed rule by section or subject area, and any other variables that may affect the implementation of the rule.

Team Expectations

We will:

- Be respectful of all perspectives and opinions.
- Communicate openly and respectfully, disagree without being disagreeable.
- Assume positive intent and ask for clarification.
- Share the air—allow everyone to share insights, one person speaking at a time.
- Ask questions and seek to understand.
- Be on time for meetings and calls.
- Be present and actively participate (no multitasking during meetings).
- Be efficient with our meeting time.
- Meet deadlines and commitments.
- Support the final decisions of the TAC.
- Stay focused on the goals and objectives of the committee.

Decision Making

- The committee will use Fist to Five and Ranked Choice Voting to make decisions.
- Primary or Alternate member voting: Both may attend, but the Primary speaks and votes. The alternate only speaks and votes when Primary is not in attendance.

Information Sharing

Board Project Team will:

- Email meeting materials 72 hours before the scheduled meeting
- Email updates and notices to TAC members and designated alternates
- Post information on 2024-2025 School Rule Review Project | SBOH (wa.gov)[1] to keep the public informed.

[1] https://sboh.wa.gov/rulemaking/agency-rules-and-activity/2024-2025-school-rule-review-project

WASHINGTON STATE BOARD OF HEALTH

School Environmental Health and Safety Rule Project 2024 - 2025

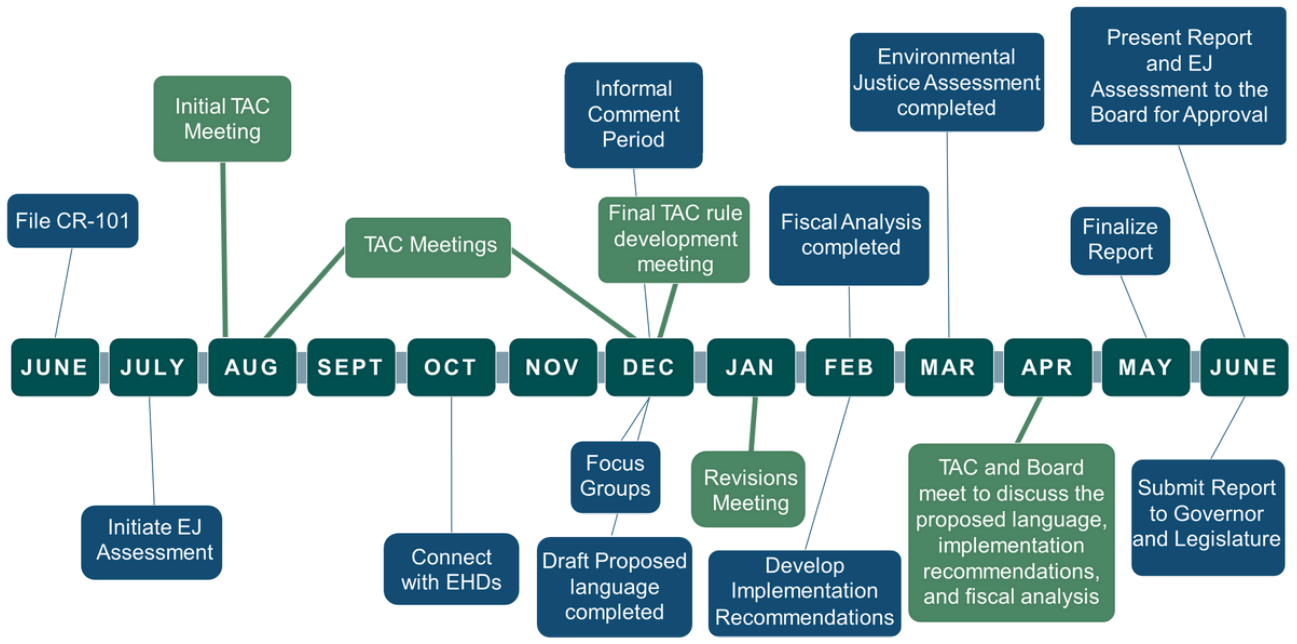
Reference Materials

- Chapter 246-366 WAC[2] Primary and Secondary Schools
- Chapter 246-366A WAC[3] Environmental Health and Safety Standards for Primary and Secondary Schools
- Chapter 296-800 WAC[4] Safety and Health Core Rules
- Title 110 WAC[5] Children, Youth, and Families, Department of

TAC Timeline

Date & Location	Location
Thursday, August 1, 2024	Wenatchee
Thursday, August 22, 2024	Olympia
Tuesday, September 17, 2024	Arlington
Friday, October 4, 2024	Leavenworth
Thursday, October 17, 2024	Olympia
Thursday, October 31, 2024	Olympia
Wednesday, November 20, 2024	Spokane
Wednesday, December 4, 2024	Olympia

Project Timeline



[2] https://app.leg.wa.gov/WAC/default.aspx?cite=246-366&full=true&pdf=true
[3] https://app.leg.wa.gov/WAC/default.aspx?cite=246-366A&full=true&pdf=true
[4] https://apps.leg.wa.gov/WAC/default.aspx?cite=296-800&full=true&pdf=true
[5] https://apps.leg.wa.gov/wac/default.aspx?cite=110&pdf=true

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WASHINGTON STATE BOARD OF HEALTH

Cover Letter

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STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH
PO Box 47990 • Olympia, Washington 98504-7990

Dear Governor Ferguson and Committees of the Legislature,

On behalf of the Washington State Board of Health (Board), I am pleased to present the School Environmental Health and Safety Rule Review report and the new proposed rule. This report is a culmination of a rigorous process conducted in collaboration with our multi-disciplinary technical advisory committee, the Department of Health (Department), the Office of the Superintendent for Public Instruction (OSPI), and local health jurisdictions (LHJs).

This report details the committee's comprehensive review of the state's outdated school environmental health and safety rule. It highlights key issues identified during the development of a new set of minimum public health and safety standards. It candidly discusses challenges that emerged, including some outside the direct scope of the Board's authority and the proposed rule. Our goal is to ensure that you and the Legislature are fully apprised of the committee's recommendations and the complexities we encountered.

Throughout the process of developing the proposed rule, the Board conducted significant outreach to communities, particularly those identified as overburdened. The TAC carefully considered the feedback that we received from the community, and where appropriate, integrated it into the proposed rule.

Full implementation of the proposed rule will require funding for both schools and LHJs to ensure they are able to comply with the minimum health and safety standards. The report's recommendations emphasize priority areas for health and safety improvements that are implemented over three phases to help schools and LHJs prepare and mitigate larger fiscal impacts. We developed this balanced approach to maximize student safety while remaining fiscally responsible.

I look forward to discussing the report and the path forward. Your insights and support are vital as we strive to create safer and healthier educational environments for all Washington students.

Thank you for your continued commitment to the wellbeing of our state's schools and communities.

Sincerely,

Patty Hayes

Patty Hayes

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Executive Summary

During the 2024 legislative session, the Legislature included a proviso in the operating budget that required the Washington State Board of Health (Board) to convene a multi-disciplinary Technical Advisory Committee (TAC) to develop a proposed set of minimum public environmental health and safety standards for schools, a fiscal analysis, and recommendations for a phased implementation. The Legislature also directed the Department of Health (Department) to complete an environmental justice assessment (EJA) on the proposed rule.

The Board, in collaboration with the Department, Office of Superintendent of Public Instruction (OSPI), and the TAC completed a comprehensive review of the existing and delayed school environmental health and safety rules (Chapters 246-366 and 366A WAC) and proposed a new chapter (246-370 WAC) to establish modern, statewide minimum standards for K-12 school facilities. The Department completed an EJA, which evaluated the proposed rule's impacts on overburdened and vulnerable communities, tribes, and populations experiencing environmental health inequities. The assessment concluded that strengthening requirements for indoor air quality, water safety, chemical storage, extreme temperatures, and safe playground design will yield substantial benefits. The assessment estimates the new measures will protect approximately 1.1 million K-12 students across 2,783 public, private, and charter schools by reducing exposure to asthma triggers, respiratory pathogens, and environmental toxins. The assessment also aided in ensuring meaningful community involvement throughout rule development.

The current environmental health and safety rules are over 50 years old. Proposed chapter 246-370 WAC provides updated definitions, site assessment protocols, construction plan reviews for new or altered facilities, routine health inspections every three years (with risk-based flexibility), and explicit direction for emergency hazards and variances. Notably, the proposed rule introduces new requirements focused on comprehensive indoor air quality, indoor temperature limits, and specialized room specifications including health rooms. The TAC's recommendations are intentionally designed to allow for flexibility while maintaining accountability for schools and local health jurisdictions. A detailed fiscal analysis estimates initial and ongoing costs to schools, local health jurisdictions, and state agencies. To help ease financial impacts and implementation challenges, the Department will develop templates and comprehensive guidance documents for required plans.

The TAC recommends a phased approach to rule implementation to reduce burden and facilitate equitable and sustainable application of the rule across the state. The first phase of rule implementation will focus on initial planning and plan development and prioritizes rule sections with minimal operational change. The second phase incorporates collaborative inspections and assessments involving school officials and local health jurisdictions. The final phase adds new requirements, such as temperature ranges and specialized room standards. Priority rankings guide resource allocation toward highest-impact provisions, such as chemical safety and indoor air quality. The report highlights challenges in aligning health and safety requirements with energy-efficiency mandates, uneven program capacity and funding across jurisdictions, and the acute needs of rural and small districts lacking capital resources or specialized staff. Addressing these concerns will require targeted funding, technical assistance, and interagency coordination to ensure all Washington students benefit equally from safer, healthier learning environments.

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Background

School Environmental Health and Safety Review

Under state law, the Washington State Board of Health (Board) has broad authority to develop public health rules to protect and improve the health of people in Washington state. Rules adopted by the Board are implemented by the Department of Health (Department) and local health jurisdictions.

Chapter 246-366[1] of the Washington Administrative Code (WAC) sets the current standards for regulating K-12 school environmental health and safety for over one million students. However, these standards are over 50 years old and outdated. In 2004, the Board began rulemaking to update these rules and in 2009 adopted chapter 246-366A[2] WAC Environmental Health and Safety Standards for Primary and Secondary Schools.

In 2010, the Legislature included the following proviso in the operating budget.

“The department of health and the state board of health shall not implement any new or amended rules pertaining to primary and secondary school facilities until the rules and a final cost estimate have been presented to the legislature, and the legislature has formally funded implementation of the rules through the omnibus appropriations act or by statute.”

Each budget since 2010 has retained the proviso, and in response, the Board has continued to extend the effective date of Chapter 246-366A WAC.

Because the Board never implemented Chapter 246-366A WAC, schools and local health jurisdictions remain subject to chapter 246-366 WAC. The 2009 rule (246-366A) includes plan review and periodic inspections, minimum building standards intended to prevent injury and the spread of communicable disease, and controls for sound, lighting, and room temperature. The rule addresses some student health and safety issues such as fall protection and chemical safety. While other rules address aspects of the health and safety that have an impact on school facilities, the Board’s rule focuses on the health and safety of K-12 students.

Disparities in funding and infrastructure for school and local health jurisdictions prevent the implementation of Chapter 246-366 WAC uniformly across the state. However, all schools

[1] https://apps.leg.wa.gov/WAC/default.aspx?cite=246-366
[2] https://apps.leg.wa.gov/wac/default.aspx?cite=246-366A

across the state receive food safety inspections and responses to complaints from their local health jurisdiction.

During the 2024 legislative session, the Legislature directed the Board to review chapter 246-366 and 246-366A WACs.[3] They directed the Board to propose updated environmental health and safety standards for K-12 schools in Washington state. Specifically, they required the Board to:

- Convene a technical advisory committee (TAC) consisting of various school associations, school districts, and OSPI to propose minimum statewide health and safety standards
- Collaborate with OSPI to develop a fiscal analysis for implementing the rules
- Assist the Department in completing an environmental justice assessment[4] on any proposed rules
- Work with the Department, OSPI, the TAC, and local health jurisdictions to provide a report to the Office of the Governor and appropriate committees of the Legislature by June 30, 2025, detailing the prioritized sections or subject matter focused on the greatest health and safety for students and the order in which they must be implemented

The Board's Timeline

Date	Milestone/Action	Purpose
May 2024	Invite TAC members	In addition to the required members, the Board included additional members such as Parent-Teacher Organizations, Teachers Unions, Students, and Private Schools.
June 20, 2024	Filed CR-101 pre-proposal statement of inquiry	The Board filed WSR 24-13-1175 with the Code Reviser to announce the intent to create rule language.
Aug 2024 – May 2024	TAC meetings	The Board Chair and staff worked with TAC members to draft rule language and discuss implementation.
Dec 2024 – Mar 2025	Listening sessions	Board staff hosted virtual and in-person meetings to discuss the preliminary draft language and

[3] https://fiscal.wa.gov/statebudgets/2024proposals/Documents/co/5950-S.SL.pdf
[4] https://doh.wa.gov/community-and-environment/health-equity/environmental-justice/assessments
[5] https://sboh.wa.gov/sites/default/files/2024-06/WSR 24-13-117.pdf

		collected feedback about the finalized draft rule language. These meetings were held across Washington state.
Dec 2024 – Feb 2025	Informal comment period	The Board staff invited all interested parties to review and share feedback on the draft rule language.
March 12, 2025	Preliminary review by the Board	Board Members reviewed the draft proposed rule language, Environmental Justice Assessment, and Fiscal Analysis.
April 9, 2025	TAC provides recommendations to the Board	TAC members provided comments and made recommendations to the Board at a joint meeting.
April 2025	Final draft proposal	Board staff finalized required products based on Board direction.
June 4, 2025	Board approves report	The Board approved the final draft rule documents and recommendations.
June 30, 2025	Report to the Governor and Legislature	The Board will submit the final draft rule language, Environmental Justice Assessment, and Fiscal Analysis to the Governor's office and legislative committees.

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Environmental Justice Assessment Summary

Washington State Department of Health
Washington State Board of Health

Purpose

The 2024 – 2025 School Rule Review project[1] involves a significant agency action to propose a new school environmental health and safety rule. The 2024 Legislature budget proviso[2] directed the State Board of Health (Board) to draft the proposed rule and directed them to collaborate with the Department of Health (Department) in completing the Environmental Justice Assessment (assessment). The Department and the Board prepared this assessment, which discusses the State Board of Health rule proposal.[3,4]

Washington law[5] requires an environmental justice assessment to evaluate potential environmental benefits and harms associated with significant agency actions. An assessment provides opportunities for meaningful participation for impacted communities and Washington Tribes, reduces environmental health disparities, and distributes environmental benefits equitably.

Background Information

The current rules under chapter 246-366 of the Washington Administrative Code (WAC) set the standards for school environmental health and safety for 1.2 million Washington State students. The Board established these rules more than 50 years ago. In 2024, the Legislature's budget proviso directed the Board to review current rules and develop an updated rule to set minimum health and safety standards for K-12 schools. The proviso also requires that the Board works with the Department to complete an Environmental Justice Assessment.

The proposed rule will affect school staff, visitors, K-12 students, and Pre-K students in public, private, and charter schools in Washington state. Pre-K sites that may be attached to schools include HeadStart, Early Childhood Education and Assistance Program, and Transition to Kindergarten. The Department of Children, Youths, and Families (DCYF) typically covers these programs, but this chapter applies to programs located inside a school facility, that are not licensed by DCYF. Younger children are especially vulnerable to environmental exposures and this assessment includes them in vulnerable populations.

[1] 2024-2025 School Rule Review Project | SBOH
[2] 5950-S.SL.pdf
[3] About Us | SBOH
[4] Chapter 43.20 RCW: STATE BOARD OF HEALTH
[5] Chapter 70A.02 RCW: ENVIRONMENTAL JUSTICE

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The Department will issue guidance based on this rulemaking to assist schools and districts with implementation, including best practices for recommended actions and requirements. This rule covers a broad range of school safety topics, including air quality standards, new construction inspections, classroom temperature, chemical storage, playground safety, imminent health hazards and specialized rooms.

Board staff, in collaboration with the TAC, reviewed but did not include other aspects of school environmental health and safety covered by other state or federal laws and rules, including drinking water regulations[6], lead in school drinking water[7] and PFAS[8,9], many of these items are included in the applicability section of the rule. Examples of areas not covered under this rule include safety drills, support services, curriculum and vaccinations.

Section One: Analyze Environmental Benefits and Harms

The assessment identifies positive environmental health and safety impacts without negative impacts on overburdened communities, vulnerable populations, and Tribes associated with this action.

Establishing baseline requirements for all schools should generally improve environmental health conditions as it codifies areas of concern that are not currently standardized. Benefits include, but are not limited to, reduced exposure to asthma triggers, respiratory pathogens, and environmental toxins. Specific areas that have positive health impacts include strengthened requirements for indoor air quality, water safety, safe indoor temperature limits, specialized rooms, chemical storage, and safe playgrounds. The assessment found no negative health impacts directly associated with this action.

Section Two: Identify Overburdened Communities and Vulnerable Populations

The assessment identifies the geographic areas, overburdened communities, and vulnerable populations where environmental and health impacts may result from the agency's actions. The scope of this rule is statewide, affecting over one million K-12 students in Washington state, and the teachers, staff, and visitors in those schools. The assessment includes maps showing statewide locations and concentrations of unhealthy air days, extreme heat days, asthma hospitalization rate by age, overburdened communities, and rates of students receiving free or reduced-price lunch benefits. All community listening sessions took place in overburdened communities.

[6] RCW 43.20.025: Definitions.
[7] RCW 28A.210.410: Lead contamination at drinking water outlets.
[8] 2414016SALandMCLdrinkingwaterCR103Ecombined.pdf
[9] PFAS in Drinking Water—Group A Public Water System Support | Washington State Department of Health

Section Three: Tribal Engagement and Consultation

On July 11, 2024, the Board sent a Dear Tribal Leader Letter to the Federally Recognized Tribes of Washington state to provide notice of the upcoming rulemaking, offer consultation, and inform Tribal Leaders of a listening session scheduled for July 22, 2024. The proposed rule does not affect state Tribal educational compact schools; however, many Tribal children attend public, private, or charter schools. Tribal perspectives help ensure that the proposed rule is equitable, represents all Washingtonians, and reflects the Washington state commitment to honoring Tribal sovereignty.

The Board engaged and continues to engage with Tribes in 2024 and 2025 for the School Rules Review project. Tribal engagement included two listening sessions, Dear Tribal Leader Letters sent to Tribal Chairs, tabling at Tribal community events, one-on-one conversations with Tribal members, and calls and emails to Tribal Health and Education Directors to invite them to the listening sessions.

Tribal rights are not directly impacted by this rule. Actions taken by the state of Washington may not impinge upon Tribal sovereignty or reserved treaty rights. The government-to-government relationship between the state of Washington and the Tribal nations requires that state agencies have meaningful consultation with the Washington Tribes[10] during the process of significant agency actions or the development of policies and program implementation. The rule does not have an impact on Tribal resources.

Tribal compact schools and Bureau of Indian Education schools may choose to implement some or all the standards from the new rule and have access to the Department guidance documents that accompany the rule. School environments may affect Tribal children more due to health, income, and food access disparities. Tribal children attending public or private schools may be in areas with the highest adverse environmental impacts, such as high temperature days, wildfire smoke events, and poor air quality days.

This rule is most likely to have an impact based on increased minimum environmental health and safety standards for all children in Washington state attending public, private, or charter schools. As many Tribal children attend public or private schools, implementation of these standards will benefit some Tribal children.

Board staff received questions about public schools owned and operated by Tribes on reservation land. The rule's prohibition of products with fragrances triggered a question in relation to cultural practices such as smudging. Board staff made a commitment to attendees to address these issues in Department guidance and best practices for implementing the proposed rule.

The Board has a duty to collaborate with Tribes in the development of policies, to inform them of updates to this work, and to provide formal consultation if requested. Ongoing engagement will continue as the rule moves through the different stages of development.

[10] RCW 70A.02.100: Tribal consultation.

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Section Four*:* Community Engagement Summary

In 2024 and 2025, Board staff held three online listening sessions and six in-person listening sessions. Board staff connected with nine educational service districts, 24 school districts, 364 schools, and 198,232 student families via school and district-level flyers. Board staff engaged with organizations that serve people who identify as Latino, Black, Indigenous, and People of Color (BIPOC), LGBTQ+, and people with disabilities. Board staff contacted local and statewide community-based organizations by phone calls, email, and Facebook groups. The Board is committed to ongoing community engagement and will continue outreach to affected communities throughout the rulemaking process.

Board staff received 79 unique informal comments and presented them to the technical advisory committee for review and consideration. Board staff engaged 53 participants in the in-person listening sessions and 171 participants in the virtual listening sessions. Concerns raised by participants included air quality, vaping, wildfire smoke, illness in schools, cost of implementation, wildfires, extreme temperatures, safe drinking water, and pest management.

The committee reviewed a summary of public comments and had access to the verbatim comments. Committee members considered the scope of the rule revision, the variety of school facilities, the funding available, and the potential impact on overburdened communities and vulnerable populations.

Ongoing engagement will continue as the rule moves through the different stages of development. The Board continues to communicate with interested parties, school districts, and local health jurisdictions. The Legislature will determine the timeline to adopt and implement the proposed rule. As the proposed rule is scheduled for adoption, the Board will gather comments on rule language from interested parties, publish rule materials on the website, and possibly schedule listening sessions leading up to filing the rule for adoption.

Section Five: Strategies to Address Environmental Harms and Equitably Distribute Environmental Benefits

Board staff included a wide range of participants and interested parties in both the technical advisory committee and the public listening sessions from diverse, vulnerable, and overburdened communities. In-person listening sessions were held in overburdened communities.

Board staff brought resources, benefits, and outreach efforts to underserved communities throughout the state.

The committee acknowledged the financial impact of regulatory or policy requirements on overburdened communities and sought solutions that would provide flexibility to address environmental health and safety issues while maintaining minimum standards that would be applied equitably throughout the state.

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The Board could use the following to track the equitable distribution of environmental health and safety by implementation of this rule:

- Local health jurisdictions voluntarily providing school inspections
- Schools voluntarily recording the air quality in schools using carbon dioxide monitors
- Identifying the number of schools or districts with extreme temperature readiness plans, indoor air quality plans, and integrated pest management.

The School Rules Review Project has developed a new rule that incorporates the best practices of the current (50-year-old) rule and adds updated scientific research and best practices. The technical advisory committee included advisors from the Office of Superintendent of Public Instruction (OSPI), large and small school districts, associations for school directors, maintenance and operations administrators, school business officials, the parent teacher association, the Department, local health jurisdictions, rural schools, private schools, and a variety of school-related organizations. Throughout the rule-making process, the Board focused on listening to underserved communities, invited all schools to public meetings held in their area, invited community-based organizations serving overburdened or vulnerable communities to participate, and considered their comments in the development of the rule.

In developing the rule proposal, Board staff balanced the need for updated, minimum health and safety standards, the fiscal challenges for all schools, and ideal best practices. The committee and Board recommended a phased implementation that prioritizes health and safety for Washington schoolchildren. This allows for equitable and sustained implementation across the state. If accepted by the Legislature, the phased implementation prioritizes critical safety concerns that have the highest impact, such as chemical storage and indoor air quality. The phased implementation also mitigates fiscal concerns. It allows statewide implementation of the rule over time. It builds flexibility for districts and local health jurisdictions to prepare and develop resources. And it encourages building partnerships between schools and local health jurisdictions for the successful implementation of the full rule.

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Proposed Rule

WAC 246-370-001 Purpose

The purpose of this chapter is to set minimum environmental health and safety standards for school facilities operated for the primary purpose of providing education.	1

WAC 246-370-005 Definitions

(1)	"Air contaminant" means pollutants in the air that could, depending on dose and circumstances, cause adverse health impacts.	3
(2)	"Decibel (dB)" means a standard unit of measurement of sound pressure.	1
(3)	"Decibel, A-weighted (dBA)" means a decibel measure that has been weighted in accordance with the A-weighting scale. The A-weighting adjusts sound level as a function of frequency to correspond approximately to the sensitivity of human hearing.	1
(4)	"Department" refers to the Washington State Department of Health.	1
(5)	"Emergency washing facilities" means equipment such as emergency showers, eyewashes, eye/face washes, hand-held drench hoses, or other similar units.	3
(6)	"Emissions" mean substances released into the air, including gases and particles, from various sources.	3
(7)	"Equivalent Continuous Sound Level" or "Leq" means the sound pressure level of a noise fluctuating over a period of time, expressed as the amount of average energy.	1
(8)	"Foot candle" means a unit of measure of the intensity of light falling on a surface, equal to one lumen per square foot.	1
(9)	"Imminent health hazard" means a significant threat or significant danger to health or safety that requires immediate action to prevent serious illness, injury, or death.	1
(10)	"Integrated pest management" means a program that reduces sources of food, water, and shelter for pests by using the least toxic pest controls when necessary.	1
(11)	"Local board of health" means the county or district board of health as defined in RCW 70.05.010(3).	1
(12)	"Local health officer" means a legally qualified physician who has been appointed as the health officer for the county or district public health department as defined in RCW 70.05.010(2) or their authorized representative.	1
(13)	"New construction" means new buildings or structures, including construction of additions to existing school facilities and reconstruction or retrofitting of an existing building not originally intended for use as a school facility. New construction does not include reconstruction of an existing school facility.	1

(14)	"Noise abatement" means measures taken to reduce unacceptable sounds or vibrations.	1
(15)	"Noise criterion" means a single number for rating the sound quality of a room by comparing actual or calculated sound level spectra with a series of established octave band spectra.	1
(16)	"Noise criterion 35 (NC35)" means the curve for specifying the maximum permissible sound pressure level for each frequency band.	1
(17)	"OSPI" refers to the Washington Office of Superintendent of Public Instruction.	1
(18)	"Portable" means any school building with a prefabricated structure that can be transported and installed on-site to provide additional educational space.	1
(19)	"Preschool" means an educational establishment or learning space offering early childhood education to children not old enough to attend kindergarten.	1
(20)	"Readiness Plan" means a written guide to ensure the health and safety of the occupants of a school facility in the event of a particular hazard, such as extreme heat or wildfire smoke.	1
(21)	"School" means any public institution of learning where the primary purpose is educational instruction for children in any grade from kindergarten through grade twelve, including transition programs, programs where students will advance to grade one the following year, and related activities by the public school as defined in RCW 28A.150.010 and any private school or private institution regulated by chapter 28A.195 RCW.	1
(22)	"School facility" means all buildings and land intended primarily for student use including, but not limited to portables, sports fields, playgrounds, classrooms, and common areas.	1
(23)	"School official" means a member of the school district or school staff who has the authority to make decisions on behalf of the district or school to maintain and improve environmental health and safety within the limitations of this rule.	1
(24)	"Site assessment" means an evaluation of any historical or other readily available information on site conditions and surroundings to evaluate whether the site poses a potential hazard to human health and determine if further investigation is needed.	2
(25)	"Source capture system" means a mechanical exhaust system designed and constructed to capture air contaminants at their source and release air contaminants to the outdoor atmosphere.	3
(26)	"Specialized room" means a space or room that has a specific function that uses equipment, furniture, or supplies not found in a standard room that are a potential health and safety risk. This may include but is not limited to a career and technical education room, laboratory, art room, or health room.	1

Proposed Rule

(27) "Stationary machinery" means equipment that is designed to be installed in a fixed location and does not require intermittent movement to service different needs.	3
(28) "Transition services" means a coordinated set of activities as defined in WAC 392-172A-01190.	1

WAC 246-370-010 Applicability

1

(1) This chapter applies to all school facilities operated for the primary purpose of providing education, including those primary and secondary school facilities that offer preschool education or transition services. This chapter does not apply to:
   (a) Any facility or part of a facility that is licensed by the department of children, youth, and families under Title 110 WAC;
   (b) Private residences used for home-based instruction as defined by RCW 28A.225.010(4);
   (c) Facilities hosting educational programs where educational instruction is not a primary purpose, including, but not limited to, detention centers, jails, hospitals, mental health units, or long-term care facilities;
   (d) Private facilities where tutoring is the primary purpose;
   (e) Public or private postsecondary education facilities providing instruction to students enrolled in secondary school; and
   (f) State-tribal education compact schools established under chapter 28A.715 RCW.

(2) Additional environmental health and safety rules that apply to school facilities include, but are not limited to:
   (a) Chapter 246-215 WAC regarding facility and equipment sanitation, food preparation, food storage, and food temperature control;
   (b) Chapter 246-217 WAC regarding food service workers, including contracted staff and volunteers, who must maintain a current food worker card as set forth in chapter 246-217 WAC;
   (c) Chapters 246-260 and 246-262, as applicable, regarding water Recreation Facilities or aquatic venues;
   (d) WAC 51-54A-0915 regarding the installation and maintenance of carbon monoxide detection and alarms in mechanical rooms and occupied zones; and
   (e) RCW 43.70.830 through 43.70.845 regarding lead in drinking water if the facility was built or all plumbing was replaced before 2016.

(3) Schools must use sewer and liquid waste disposal that is connected to a municipal sewage disposal system or an on-site sewage disposal system designed, constructed and maintained under chapter 246-272A or 246-272B.

(4) Schools must provide drinking water from public water supplies regulated under WAC 246-290 or 246-291.

(5) These rules are not intended to replace or supersede the department of labor and industries' authority and jurisdiction under Title 296 WAC over employee safety and health.

Proposed Rule

(6) These rules are not intended to replace building code council requirements under Title 51 WAC. In the event this chapter is more stringent to protect health and safety it may supersede Title 51 WAC.
(7) If the local permitting jurisdiction received a complete building permit application for school construction before the effective date of this chapter, the construction-related requirements of chapter 246-366 WAC apply.

WAC 246-370-015 Good Safety Practice and Guidance

1

(1) Except where more specific requirements apply, school facilities must apply good safety practices to conditions which present a potential hazard to occupants of the school.
(2) The department in cooperation with OSPI shall review potentially hazardous conditions in schools which are not aligned with good safety practice, especially in specialized rooms.
(3) The department and OSPI shall jointly prepare a guide for use during routine school inspections to identify issues relating to good safety practices. The guide should include recommendations for safe facilities and safety practices.
(4) The guide shall be reviewed and updated at least every five years.

WAC 246-370-020 Site Assessment

2

(1) A local health officer shall conduct or require that a site assessment be conducted when a school district is planning:
  (a) To construct a new school facility on a site that was previously undeveloped or developed for other purposes; or
  (b) To convert an existing structure for primary use as a school facility.
(2) A local health officer may conduct or require that a site assessment be conducted when a school district is planning to construct:
  (a) A new school facility on an existing school site; or
  (b) An addition to an existing school facility.
(3) A site assessment must include:
  (a) A Phase 1 Environmental Site Assessment (ESA) that meets the requirements of the American Society for Testing and Materials (ASTM) Standard #1527-21 (published December 2021);
  (b) Sampling and analysis of potential contaminants if the Phase 1 ESA indicates that hazardous materials may be present. Sampling and analysis must comply with the applicable rules of the department of ecology, WAC 173-303-110 ; and
  (c) A noise assessment that measures noise from all sources during the hours that school is normally in session.
    (i) The noise must not exceed:
      (A) An hourly average of 55 dBA or the mean sound energy level for a specified time in Leq 60 minutes; and

Proposed Rule

(B) A maximum sound level, recorded during a specified time, measured as Lmax, of 75 dBA during the time of day the school is in session.

(4) A school official shall ensure:

(a) The local health officer receives notification within 90 days of starting:

(i) The preliminary planning for school construction that requires a review and approval of a site assessment by a local health officer under subsection (1) of this section; or

(ii) The preliminary planning for school construction under subsection (2) of this section to determine if a site assessment is required;

(b) Consultation with the local health officer throughout the plan development phase regarding the scope of the site assessment when one is required and the timeline for completion of the site assessment;

(c) The submission of a written report to the local health officer for a required site assessment that assesses the potential impact on health and safety presented by the proposed site and includes, but is not limited to, the following:

(i) The findings and results obtained under subsection (3) of this section;

(ii) An analysis of the findings;

(iii) If a site exceeds sound levels under subsection (3)(c)(i), the school official must include a plan for noise reduction in the new construction proposal under WAC 246-370-030;

(iv) Identified health and safety risks present at the site;

(v) A description of any mitigation proposed to address identified health and safety risks present at the site;

(vi) Any site assessment-related information requested by the local health officer to complete the site assessment review and approval process; and

(d) The acquisition of a site review and written site approval from the local health officer when required under subsection (1) or (2) of this section.

(5) When notified by a school official of preliminary planning for school construction, the local health officer shall:

(a) Conduct an inspection of the proposed site;

(b) Determine whether a site assessment is required when notice is provided under subsection (4)(a)(ii) of this section and notify the school official of the determination;

(c) Review the inspection findings, written report provided under subsection (4)(c), and any other site assessment-related information for environmental health and safety risk;

(d) For site assessments conducted under subsection (1) of this section, provide written approval or describe site deficiencies needing mitigation to obtain approval or deny use of the proposed school facility site if mitigation is not possible within 60 days of receiving a complete request unless a school official and the local health officer agree to a different timeline; and

(e) For site assessments conducted under subsection (2) of this section, provide written approval or describe site deficiencies needing mitigation to obtain approval of the proposed school facility site within 60 days of receiving a complete request unless the school officials and the local health officer agree to a different timeline.

(6) If a written site assessment request from a school official is received by the local health officer before the effective date of this section, the site assessment requirements of chapter 246-366 WAC apply unless otherwise specified in this chapter.

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

2

(1) The following school construction projects must be reviewed and approved by the local health officer:
   (a) Construction of a new school facility, playground, bathroom, shower, or specialized room;
   (b) Establishment of a school in all or part of any existing structure previously used for another purpose;
   (c) Additions or alterations consisting of more than 5,000 square feet of floor area or more than 20 percent of the total square feet of an existing school facility, whichever is less;
   (d) Alteration of a playground, bathroom, shower, or specialized room; and
   (e) Installation or construction of a portable classroom.

(2) A school official shall ensure:
   (a) Consultation with the local health officer takes place at the 50 percent design development stage of school construction project plans to determine if the project requires construction review;
   (b) The provision of additional documents, beyond the construction project plans, if requested by the local health officer, which may include, but are not limited to, written statements signed by the project's professional engineer or licensed architect verifying that design elements comply with requirements specified by this chapter;
   (c) Consultation with the local health officer to determine whether additional construction project review is required to ensure that the project meets the requirements of this chapter;
   (d) The submission of the design at the 100 percent development stage for the construction design plans.
   (e) The acquisition of a written approval from the local health officer for the construction project before starting construction;
      (i) If the school official meets the requirements of subsection (2)(a) but the local health officer does not meet the requirements of subsection (3), the school official may proceed with their scheduled construction timeline;
   (f) The submission of a request for a preoccupancy inspection to the local health officer to correct any imminent health hazards before allowing occupancy at the school facilities; and

Proposed Rule

(g) The local health officer receives notification at least five business days before a desired preoccupancy inspection.

(3) The local health officer shall:

(a) Respond to a request to consult with a school official within 15 business days of receipt;

(b) Consult with a school official to determine the necessary documentation for plan review and approval of the particular project;

(c) Review construction project plans at the 50 percent design development stage to confirm the need for a construction review and approval to meet the health and safety requirements of this chapter;

(d) Consult with a school official when requiring additional construction plan reviews between the 50 and 100 percent construction plan design development stages;

(e) Identify and request any additional documents needed to determine compliance with the requirements outlined in this chapter;

(f) Provide written approval within 60 days of receiving the 100 percent design development for the construction design plans or provide a written statement describing construction project plan deficiencies that need to change to obtain approval. The school official and the local health officer may alter this timeline if mutually agreed upon;

(g) Conduct an inspection:

(i) Before occupancy of a completed construction project and within five business days after receiving a request from a school official;

(ii) At any point during the construction period to verify compliance with the requirements of this chapter;

(iii) In a coordinated effort with the on-site project manager or other appropriate person identified by a school official; or

(iv) To confirm satisfactory correction of the items identified under (h) or (i) of this subsection;

(h) If an imminent health hazard is identified during an inspection, work with the school official and local building official to identify and agree upon a solution that the school officials will implement before occupation of the affected portion; and

(i) If other conditions of noncompliance with this chapter are identified during an inspection, provide the school official with a written list of items and consultation in developing a correction schedule based on the level of risk to health and safety.

Proposed Rule

WAC 246-370-040 Routine Inspection

(1) The local health officer shall: 2

(a) Conduct an environmental health and safety inspection of each school facility within their jurisdiction every three years, prioritizing areas for emphasis based on risk;

(b) Notify school officials at the time of discovery, or immediately following the inspection, if conditions that pose an imminent health hazard are identified and follow the imminent health hazard requirements set forth in WAC 246-370-120;
(c) Consult with school officials upon completion of the inspection about findings and recommended follow-up actions and, if necessary, collaborate with school officials to develop a remediation schedule;
(d) Issue a final inspection report within 60 days following an inspection. The local health officer may establish an alternate timeline for issuing the final inspection report when agreed upon in consultation with school officials. The report must include inspection findings related to this chapter and any required remediation; and
(e) Confirm, as needed, that corrections are made.

(2) The local health officer may:
(a) Adjust the inspection interval of the schools within their jurisdiction by developing a written risk-based inspection schedule that is uniformly applied throughout the jurisdiction based on credible data or local risk factors. The time between routine inspections may not:
(i) Exceed five years; and
(ii) Be more frequent than one year; or
(b) Allow a school official or qualified designee to conduct the required additional inspections under a program approved by the local health officer if the program includes provisions for:
(i) Assuring that the school official or designee conducting the inspection has attended training in the standards, techniques, and methods used to conduct an environmental health and safety inspection;
(ii) Completing a standardized checklist at each inspection; and
(iii) Providing a written report to the local health officer detailing the findings of the inspection, within 60 days of completing the inspection.

Proposed Rule

WAC 246-370-050 General Building Requirements

1

A school official shall ensure that school facilities:
(1) Are clean and in good repair;
(2) Do not attract, shelter, or promote the propagation of insects, rodents, bats, birds, or other pests of public health significance;
(3) Have floors that suit the intended use, allow easy cleaning, and dry easily to inhibit mold growth and mitigate fall risks;
(4) Have no projections from the finished ceiling that are less than seven clear vertical feet from the finished floor;
(5) Have vacuum breakers or backflow prevention devices installed on hose bibs, sinks, and supply nozzles where hoses or tubing can be connected;
(6) Provide proper storage for student jackets or backpacks, play equipment, and instructional equipment to mitigate trip, pest, or other public health hazards;

(7) Contain toilet and handwashing facilities that are accessible for use during school hours and scheduled events;
(8) Provide handwashing stations equipped with:
  (a) Soap;
  (b) Single-use towels, disposable towels, blower, or equivalent hand-drying device;
  (c) Fixtures with water temperatures that do not exceed 120-degrees Fahrenheit; and
  (d) Fixtures that deliver at least 10 seconds of running water if they are self-closing, metering faucets.
(9) Provide toilet paper in restrooms;

(10) Provide handwashing sinks that are accessible where activities present a potential risk of microbiological or chemical contamination of the hands in any student spaces, which may include, but are not limited to: 3
  (1) Restrooms;
  (2) Specialized rooms; or
  (3) Health rooms; and
(11) Provide accessible drinking fountains that are constructed with a nozzle that directs an arc of water to flow away from the nozzle and is located above water-impervious flooring. The drinking fountains must be deactivated when attached to a handwashing sink in a specialized room or located in a restroom.

WAC 246-370-060 Showers and Restrooms

(1) For new construction or alterations of an existing shower facility for grades nine and above with classes in physical education or team sports, at least one shower must: 3
  (i) Meet the Federal Americans with Disabilities Act (ADA);
  (ii) Meet the requirements of the uniform plumbing code set forth in chapter 51-56 WAC;
  (iii) Be accessible to any student for use during school hours and scheduled events; and
  (iv) Contain floors that are slip resistant.
(2) For new construction or alterations of an existing shower facility for grades nine and above with classes in physical education or team sports, if a locker or dressing room is provided, it must have easy-to-clean walls and floor surfaces that are slip resistant.
(3) For new construction or alterations of an existing restroom facility, restrooms must:
  (a) Contain handwashing fixtures that do not have water temperatures that exceed 120 degrees Fahrenheit;
  (b) Meet the requirements of the uniform plumbing code set forth in chapter 51-56 WAC;
  (c) Contain floor surfaces impervious to water, slip-resistant, and sloped to floor drains;
  (d) Contain walls, floors, and ceilings that are easy to clean; and
  (e) Contain soap and single-use or disposable towels. Blower or equivalent hand-drying devices are prohibited.

Proposed Rule

WAC 246-370-070 Indoor Air Quality and Ventilation

A school official shall ensure:	
(1) The implementation of a written indoor air quality plan within five years of the effective date of this section that includes: (a) Identified areas of indoor air quality concerns and development of preventive measures to address the concerns; (b) A schedule to perform routine inspections of heating, ventilation, and cooling systems; (c) An integrated pest management plan; (d) A plan for monitoring and mitigating carbon dioxide levels if required by subsection (7)(b)(iii) of this section; and (e) A plan with identified actions for ensuring health and safety for periods of increased health risk or poor outdoor air quality;	1
(2) The control of air contaminant sources by: (a) Excluding sources of potential air contaminants from a school facility; or (b) Providing a space with appropriately used and maintained ventilation to minimize student exposure to potential air contaminants;	3
(3) The development and implementation of a plan to test for radon every five years in regularly occupied areas on or below ground level;	1
(4) The prohibition of air fresheners, candles, or other products that contain fragrances; (5) The minimization of student exposure to construction activities that generate emissions by physically containing the activities or conducting activities when students are not present; (6) The prompt control of identified moisture sources and remediation of mold using measures to minimize occupant exposure to mold and chemicals used during the remediation process; (7) Adequate ventilation by: (a) Ensuring direct mechanical exhaust for specialized rooms as set forth in WAC 246-370-140; and (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; (i) 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; (ii) Compliance is determined based on variables including but not limited to: (A) The type and area of the space; (B) The planned number of occupants; (C) The type of ventilation system; and	3

Proposed Rule

(iii) 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;

(8) Adequate filtration by:

(a) 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 facilities that have small, ducted air handlers and ventilation systems;

(i) 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; and

(9) For schools with mechanical heating, ventilation, or cooling systems, the performance of routine maintenance that includes:

(a) Testing and balancing for existing heating, ventilation, and air conditioning systems every fifteen years;

(b) Performing routine inspections of existing heating, ventilation, and cooling systems to ensure systems are operating within intended parameters of this rule;

(c) Replacing filters as needed to achieve required filtration and air flow rates; and

(d) Maintaining records of these activities for review upon request by the local health officer.

WAC 246-370-080 Temperature

(1) A school official shall ensure the development of an extreme temperature readiness plan and implement the plan when a school facility is occupied by students and either of the following conditions apply:	1
(a) Classroom temperatures are outside of the range of 65 degrees to 79 degrees Fahrenheit; or (b) Hallways, gymnasiums, and common area temperatures are outside of the range of 60 degrees to 79 degrees Fahrenheit.	3
(2) A school official may consult with a local health officer to develop an extreme temperature readiness plan.	1

WAC 246-370-090 Noise

A school official shall ensure: (1) For new construction:	1

Proposed Rule

(a) Ventilation equipment or other equipment that will contribute to mechanical noise sources in a classroom must include designs that ensure that the background sounds conform to a noise criterion curve or equivalent not to exceed NC-35. The school official shall certify that equipment and features are installed according to the approved plans;

(b) The actual background noise at any student location within a newly constructed classroom must not exceed 45 dBA (Leqx) and 70 dB(Leqx) (unweighted scale) where x is thirty seconds or more. The health officer shall determine compliance with this section when the ventilation system and the ventilation system's noise generating components, such as the condenser, heat pump, and other similar components are in operation; and

(c) The maximum ambient noise level in specialized rooms shall not exceed 65 dBA when all fume and dust exhaust systems are operating;

(2) Portable classrooms constructed before January 1, 1990, moved within the same school property or the same school district, are excluded from the requirements of this section if the portable classrooms:

(a) Do not alter the noise abatement features;

(b) Do not increase noise-generating features;

(c) Were previously used for classroom instruction;

(d) Do not change ownership; and

(e) Are located on a site that meets the noise assessment requirements set forth in WAC 246-370-020(3)(c);

(3) The maximum noise exposure for students in classrooms shall not exceed the levels specified in Table 1;

(4) Activities that expose students to sound levels equal to or greater than 115 dBA are prohibited; and

(5) Students are provided with and required to use personal protective equipment where noise levels exceed those specified in Table 1. Personal protective equipment must reduce student noise exposure to comply with the levels specified in Table 1.

Table 1 Maximum noise exposures permissible

Duration per day (hours)	Sound Level (dBA)
8	85
6	87
4	90
3	92
2	95
1-1/2	97
1	100
1/2	105
1/4	110

Proposed Rule

Board of Health Legislative Report

WAC 246-370 School Environmental Health and Safety Rule

June 2025

WAC 246-370-100 Lighting

A school official shall ensure that:

1

(1) Light intensities that meet or exceed those specified in Table 2 are provided. Natural lighting, energy-efficient lighting systems, lighting fixtures, or bulbs may be used to maintain the minimum lighting intensities;

Table 2 Lighting intensities measured 30 inches above the floor or on working or teaching surfaces. Some lighting fixtures may require a start-up period before reaching maximum light output.

Task	Min. Foot Candle Intensity
Specialized rooms where safety is of prime consideration or fine detail work is done, for example, family and consumer science laboratories, science laboratories (including chemical storage areas), shops, drafting rooms, and art and craft rooms.	50
Kitchen and food preparation areas.	50
General instructional areas, for example, study halls, lecture rooms, and libraries.	30
Gymnasiums: main and auxiliary spaces, shower rooms and locker rooms.	20
Non-instructional areas including auditoriums, lunchrooms, food storage rooms, assembly rooms, corridors, stairs, storerooms, and restrooms.	10

(2) Excessive brightness and glare in all instructional areas is controlled. Surface contrasts and direct or indirect glare must not cause excessive eye accommodation or eye strain problems;

(3) Sun control to exclude direct sunlight from window areas and skylights of instructional areas, assembly rooms, and meeting rooms during at least 80 percent of the normal school hours is provided. Sun control is not required for sun angles less than 42 degrees up from the horizontal. Sun control is not required if air conditioning is provided, or special glass is installed having a total solar energy transmission factor of less than 60 percent;

(4) Lighting in a manner that minimizes shadows and other lighting deficiencies on work and teaching surfaces is provided; and

(5) Windows in sufficient number, size, and location to enable students to see outside at least 50 percent of the school day are provided. Windows are optional in specialized rooms.

Proposed Rule

Board of Health Legislative Report

WAC 246-370 School Environmental Health and Safety Rule

June 2025

WAC 246-370-110 Injury Prevention

3

A school official shall ensure:

(1) The mitigation of potential slip and fall hazards by, but not limited to:
   (a) Providing stairwells and ramps with handrails and stairs with surfaces that reduce the risk of injury;
   (b) Providing protection or barriers for areas that have fall risks such as balconies and orchestra pits;
   (c) Storing unsecured equipment in a manner that prevents unauthorized use or injury;

(2) The storage of chemicals and cleaning supplies includes:
   (a) Manufacturer use instructions, warning labels, and safety data sheets for proper storage of the supplies;
   (b) Labels on supplies that are diluted from bulk chemical or cleaning agents with the accurate agent name and dilution rates;
   (c) The original bulk or concentrated containers of cleaning and disinfectant agents for reference to labels and instructions until diluted contents are exhausted;
   (d) Separation of incompatible substances; and
   (e) Access limited to authorized users;

(3) The use of fragrance-free and low-hazard cleaning and sanitation supplies when available or ensure cleaning at a time and manner that would limit exposure to students; and

(4) Documentation of a policy to mitigate injury and the spread of diseases if the school allows animals other than service animals in a school facility.

WAC 246-370-120 Imminent Health Hazard Procedure

2

(1) If a school official identifies a condition that could pose an imminent health hazard, a school official shall ensure:
   (a) The immediate mitigation of hazards and prevention of exposure if an imminent health hazard is confirmed;
   (b) The immediate consultation with the local health officer to investigate the suspected hazard; and
   (c) Consultation with the local health officer in developing appropriate health and safety messages for school staff, students, and parents.

(2) If a local health officer identifies a condition that is an imminent health hazard at a school, the local health officer shall:
   (a) Immediately inform school officials of the imminent health hazard;
   (b) Consult with school officials to mitigate hazards and prevent exposure; and
   (c) If requested, assist school officials in developing health and safety messages for school staff, students, and parents.

Proposed Rule

WAC 246-370-130 Playgrounds

(1) A school official shall ensure: (a) Consultation with the local health officer regarding playground review and approval requirements takes place prior to: (i) Installing new playground equipment or fall protection surfaces; (ii) Adding new playground features or equipment to an existing playground; or (iii) Modifying existing playground equipment, features, or fall protection surfaces;	2
(b) The proper installation, maintenance, and operation of playground equipment, including used equipment, and fall protection surfaces: (i) In a manner consistent with the ASTM F 1487-21: Standard Consumer Safety Performance Specification for Playground Equipment for Public Use; and (ii) In a manner consistent with the manufacturer's instructions and *Consumer Product Safety Commission Handbook for Public Playground Safety*, 2010;	3
(c) The local health officer receives requested information including playground plans, equipment specifications, and any additional information; and (d) Acquisition of a plan review and written approval from the local health officer before installing, adding, or modifying playground equipment or fall protection surfaces. (2) The local health officer shall: (a) Consult with a school official to determine necessary documentation for playground plan review and approval consistent with the scope of the particular project; (b) Review playground plans and equipment specifications to confirm that the requirements of these rules are addressed; (c) Identify and request any additional documents required to complete the review; (d) Provide written approval or denial of the playground plans and equipment specifications within 60 days of receiving all documents needed to complete the review unless the school officials and the local health officer agree to a different timeline; (e) Verify that playground installation complies with the requirements of this section; and (f) Coordinate all playground-related inspections with the school official.	2
(3) The use of chromated copper arsenate or creosote-treated wood to construct or install playground equipment, landscape structures, or other structures on which students may play is prohibited.	3

Proposed Rule

WAC 246-370-140 Specialized Rooms

3

(1) A school official shall ensure specialized rooms that are part of a school facility include, if applicable:
- (a) Single-use soap and single-use towels at handwashing sinks;
- (b) Emergency washing facilities that contain an emergency shower or emergency eyewash fountain or both:
  - (i) An emergency shower must:
    - (A) Be provided when there is potential for major portions of a person's body to contact corrosives, strong irritants, or toxic chemicals; and
    - (B) Deliver water that cascades over the user's entire body at a minimum rate of 20 gallons (75 liters) per minute for fifteen minutes or more;
  - (ii) An emergency eyewash fountain must:
    - (A) Be provided when there is potential for a person's eyes to be exposed to corrosives, strong irritants, or toxic chemicals;
    - (B) Irrigate and flush both eyes simultaneously while the user holds their eyes open;
    - (C) Contain an on-off valve that activates in one second or less and remains on without user assistance until intentionally turned off; and
    - (D) Deliver at least 0.4 gallons (1.5 liters) of water per minute for fifteen minutes or more;
  - (iii) Emergency washing facilities must:
    - (A) Be located so that it takes no more than 10 seconds to reach and the travel distance should be no more than 50 feet;
    - (B) Be kept free of obstacles blocking their use;
    - (C) Function correctly;
    - (D) Provide the quality and quantity of water that is satisfactory for emergency washing purposes; and
    - (E) Be designed, installed, and maintained in accordance with the American National Standards Institute (ANSI) publication Z358.1 - 2014, American National Standard for *Emergency Eyewash and Shower Equipment;*
- (c) A prohibition of use and storage of compounds that are:
  - (i) Considered shock-sensitive explosives, for example, picric acid, dinitro-organics, isopropyl ether, ethyl ether, tetrahydrofuran, dioxane; or
  - (ii) Lethal at low concentrations when inhaled or in contact with skin, for example, pure cyanides, hydrofluoric acid, toxic compressed gases, mercury liquid and mercury compounds, and chemicals identified as the P-list under WAC 173-303-9903. This excludes prescribed medications such as epinephrine pens;
- (d) Safety procedures and processes for instructing students regarding the proper use of hazardous materials or equipment;
- (e) Appropriate personal protective equipment when exposure to potential hazards might occur;

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(f) Appropriate situation-specific emergency equipment is available when exposure to potential hazards might occur;
(g) Appropriate ventilation, source capture system, or other equipment approved by the local health officer to prevent the recirculation of air into the room or transfer of airflow into other parts of the school facility and to prevent contaminants from entering the students breathing zone; and
(h) Emergency shut-off valves or switches for gas and electricity connected to stationary machinery are installed during new construction. Valves or switches must:
(i) Be located close to the exit door;
(ii) Have unobstructed access; and
(iii) Have signage posted adjacent to the valve that room occupants can easily read and understand from the opposite side of the room during an emergency.

(2) If a school facility has a designated health room, a school official shall ensure that it includes:
(a) The means to visually supervise and provide privacy for room occupants;
(b) Surfaces that staff can easily clean and sanitize;
(c) A handwashing sink in the room;
(d) An adjoining restroom; and
(e) Mechanical exhaust ventilation that prevents air from flowing from the health room to other parts of the school facility.

WAC 246-370-150 Variances and Emergency Waivers

2

(1) A school official may:
(a) Submit a written variance request to the local health officer if there is an alternative that meets the intent of this chapter. The variance request must include:
(i) The specific rule section or sections that the variance would replace;
(ii) The alternative proposed to replace the rule section or sections;
(iii) A description of how the variance will provide a comparable level of protection as the rule section or sections that it will replace; and
(iv) Any clarifying documentation needed to support the request, including but not limited to, engineering reports, scientific data, or photos; and
(b) Implement a variance only after obtaining approval from the local health officer.

(2) The local health officer shall provide written approval or denial of a request for a variance to the school applicant and the department within 60 days of receiving a complete written variance request, unless the school official and the local health officer agree to a different timeline.

(3) The local health officer may grant a school official an emergency waiver from some or all the requirements in this chapter for the use of a temporary facility, if the facility normally used by the school is not safe to be occupied.

Proposed Rule

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WAC 246-370-160 Appeals

(1) A school official may appeal any environmental health and safety decisions or actions of the local health officer to the local board of health.
(2) The local board of health will conduct environmental health and safety appeals in a manner consistent with the written procedure within each office.

2

WAC 246-370-170 Severability

If any provision of this chapter or its application to any person or circumstance is held invalid, the remainder of the chapter or the application of the provision to other persons or circumstances is not affected.

1

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Fiscal Analysis

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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, subsections 246-366-040 (current regulation) and 246-370-030 (proposed regulation) WAC both address construction plan reviews. 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 currently required under chapter 246-366. To calculate the additional labor costs needed to comply with the rule, the Board staff surveyed local health officials (LHOs) and the Department of Health (department) staff. The survey gathered the estimated number of additional labor hours needed and identified the staff role that would be most likely to perform those additional labor hours.

Labor cost categories:

- **School Official Hours**: The school officials provided a range of hours for each task. The Board staff provided a minimum, maximum, and average of these results.
    - To help reduce labor hour costs to the schools, the Department is creating templates to guide schools when they develop the following plans required by the proposed rule (Please see **Appendix A: Readiness Plans** for the proposed guideline requirements):
        1. Indoor Air quality Plan
        2. Radon Plan
        3. Carbon Dioxide Monitoring Plan
        4. Integrated Pest Management Plan
        5. Extreme Temperature Readiness Plan

Some, but not all, local boards of health require cost recovery. Boards that require cost recovery may assess additional fees to schools in their jurisdiction.

- **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.

Labor hour wage calculation:

- **School Wage Calculation:** The school officials provided a range of "Duty" classifications that would perform the additional hours for each task. Each task has unique Duty classifications specific to that task. There will be slight variations in minimum and maximum labor wage calculations throughout this document. The Board staff used the Duty classifications that the school officials provided to calculate hourly wages based off Office of

Superintendent of Public Instruction's (OSPI) *Final School District Personnel Summary Reports 2023-24 School Year*[1].A list of all the Duty codes starts on page 23 that OSPI tracks from year to year. The total wage considers salary, benefits, and total days in 1.0 FTE. The data provided by the schools included a range of job duties that may perform the task in question, so Board staff provided a minimum, maximum, and average of these results.

- **LHO Wage Calculation:** Surveyed data from LHOs concluded that an Environmental Health Program Specialist would most likely perform the duties required in the proposed rule. LHOs also shared Washington State Local Health District wage information collected in 2024 by Washington State Association of Local Public Health Officials (WSALPHO) (See **Appendix B: Environmental Health Specialist Salaries** for salary ranges by jurisdiction size). WSALPHO's data provided a range of annual salaries based on service population size. The Board staff also estimated benefits and indirect costs based on email polls and phone conversations. Benefits and indirect costs can vary year by year, so we provide only an approximate percentage of the hourly wage. The annual wages, benefits and indirect costs were used to provide a minimum, maximum, and average hourly wage for all LHO labor calculations.

- **Department and OSPI Wage Calculations:** The Department and OSPI provided Job Class Titles and hourly estimates for the positions that would likely perform the duties required in the proposed rule. To calculate total labor costs the Board staff used data from the Office of Financial Management[2] for hourly wage and the Department's benefit and indirect costs rate.

  - **Construction Costs:** Professional engineers that specialize in school construction supported construction cost calculations. (See **Appendix C: Construction Cost Estimates**)
  - **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 we calculate some costs as costs per square foot, we used self-reported data for approximately 2,235 public schools.

[1] https://ospi.k12.wa.us/sites/default/files/2024-02/allpersonnelsummaryreport2023-24.pdf (accessed 4/21/2025)
[2] https://ofm.wa.gov/state-human-resources/compensation-job-classes/job-classes-and-salaries
[3] https://ospi.k12.wa.us/policy-funding/school-buildings-facilities/information-and-condition-schools-icos

Table 1: School Statistics

School Type	Total Square Feet
Smallest	929
Average	77,391
Largest	367,301

- **Cost Definitions**
  - **Initial Cost:** Some routine tasks cost more to set up initially but cost less with future repetition. For instance, the time it takes to do an initial walk through of an older, established large school and identify any safety deficiencies would take longer than the follow up routine walk through after repairing the deficiencies.
  - **One time Cost:** The cost to perform the task once (assuming a cost difference from the initial costs).
  - **Annual Cost:** The cost to perform the task once a year.
  - **Interval Cost:** The cost to perform a task at a required interval of time like once every 5 years.
- **All costs above $1.00 rounded up to whole numbers.**

Table 2: Number of Types of School

School Type	Number of Students	Number of Schools
Public[4]	1,104,247	2,235
Private[5]	88,998	531
Charter[6]	5,000	17

Table 3: Sections Not Analyzed

WAC Section and Title	Section Purpose	Exemption Reason
WAC 246-370-001 Purpose Formerly 246-366-005[7]	Introduces the topic of the rule and why adopted	Clarifies who the rule intends to govern
WAC 246-370-005 Definitions Formerly 246-366-010[8]	Add clarity to rule language and do not impose requirements for schools to conform to	Brings clarity to rule language only

4 https://ospi.k12.wa.us/policy-funding/school-buildings-facilities/information-and-condition-schools-icos 2024-2025 enrollment (Accessed 3/18/2025)
5 https://projects.propublica.org/private-school-demographics/states/wa 2021-2022 Data (Accessed 4/7/2025)
6 https://wacharters.org/charter-public-schools-faq/ (accessed 4/7/2025)
7 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-005&pdf=true
8 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-010&pdf=true

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WAC Section and Title	Section Purpose	Exemption Reason
WAC 246-370-010 Applicability Formerly 246-366-060[9], -070[10], and -130[11]	Outlines what type of school this WAC applies to and refers to other regulations that schools must conform to	Clarifies the entities this rule governs and other environmental health and safety regulations that govern those entities
WAC 246-370-060 Showers and Restrooms Formerly WAC 246-366-090[12] and 100[13]	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[14]	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[15]	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[16]	Establishes the independence of individual provisions of the rule and how they remain valid if deeming one provision invalid	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

9 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-060&pdf=true
10 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-070&pdf=true
11 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-130&pdf=true
12 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-090&pdf=true
13 https://app.leg.wa.gov/WAC/default.aspx?cite=24 6-366-100&pdf=true
14 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-110&pdf=true
15 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-120&pdf=true
16 https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-160&pdf=true

Fiscal Analysis by Section

WAC 246-370-015 Guidance

Formerly 246-366-140[17]

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

Table 4: Labor: One Time Costs

Agency	Position	Hourly Total Compensation	Total Hours	Position Total
OSPI	Administrative Program Specialist 2	$69	120	$8,222
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
			Total	**$68,243**

[17] (Accessed 4/2025) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-140&pdf=true

Table 5: Labor: Once Every Five Years Costs

Agency	Position	Hourly Total Compensation	Total Hours	Position Total
OSPI	Administrative Program Specialist 2	$69	40	$2,741
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
			Total	**$43,138**

WAC 246-370-020 Site Assessment

Formerly 246-366-030[18]

A site assessment provides a historical review of properties and considers commonly known and reasonably ascertainable information to identify recognized environmental conditions in connection with the subject property and the surrounding area.[19]

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

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
- 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 researches and evaluates historical site conditions and the surrounding areas. This includes historical land use to identify known soil contamination issues or other environmental factors of interest. A site assessment for a renovation of an existing building will require additional research to assess the building use and potential building contamination. If an assessment raises concerns 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.

Phase 1 and Phase 2 Site assessment costs were an estimate from phone surveys of companies that perform site assessments in Washington state.

[18] (Accessed 12/2024) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-030&pdf=true
[19] (Accessed 12/2024) https://www.astm.org/e1527-21.html

Table 6: Trade Service Cost: Cost per ASTM Site Assessment

Task	Min.	Max.
ASTM Phase 1 Site Assessment	$1,400	$5,000
ASTM Phase 2 Site Assessment	$10,000	$30,000

After a completed Phase 1 or Phase 2 site assessment, the LHO will need to review the results and approve the site for construction.

Table 7: Site Assessment: Additional LHO Labor

	Hourly Wage	Hours	Total Costs Per Site Assessment Review
Min.	$40	3	$120
Avg.	$71	7	$497
Max.	$105	12	$1,260

Table 8: Site Assessment: LHO Hourly Fee

	Hourly Fee	Hours	Total Costs Per Site Assessment Review
Min.	$100	3	$300
Avg.	$162	7	$1,134
Max.	$250	12	$3,000

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

Table 9: Site Assessment: Additional School Official Labor

	Hourly Wage	Hours	Total Costs Per Site Assessment
Min.	$48	2	$96
Avg.	$107	61	$6,527
Max.	$133	200	$26,600

Table 10: Total Additional 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)[20]

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. Upon completion, the LHO will inspect the newly constructed building to ensure no imminent health hazards exist and that the building complies 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.
  - An LHO has 15 days from receipt of a request to consult with a school official.
  - An 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 the need for additional review.
  - 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.

[20] (Accessed 12/2024) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-040&pdf=true

Table 11: Construction Plan Review: Additional LHO Labor Hours

	Hourly Wage	Hours	Total Costs Per Plan Review
Min.	$0	0	$0
Avg.	$0	0	$0
Max.	$0	0	$0

Table 12: Construction Plan Review: Additional School Official Labor Hours

	Hourly Wage	Hours	Total Costs Per Plan Review
Min.	$46	0	$0
Avg.	$106	13	$1,378
Max.	$134	100	$13,400

WAC 246-370-040 Routine Inspection

Formerly WAC 246-366-040(2)(b)[21]

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

Since LHOs have flexibility based on the need to alter the routine inspection frequency of their district, a total cost per year cannot be determined, however we have calculated the total additional cost per inspection below.

Table 13: Routine Inspection: Additional LHO Hours

	Hourly Wage	Hours	Total Cost
Min.	$40	1	$40
Max.	$105	2	$210

Table 14: Routine Inspection: Additional School Official Hours

	Hourly Wage	Hours	Total Costs
Min.	$42	0	$0
Max.	$133	6	$798

Table 15: Routine Inspection: Combined Totals

	Total
Min.	**$40**
Max.	**$1,008**

Regardless of the routine inspection schedule mentioned above, the local health officers and qualified routine inspection designee or school official must attend annual inspection training.

[21] (Accessed 12/2024) https://app.leg.wa.gov/wac/default.aspx?cite=246-366-040

Table 16: Routine Inspection: Required Annual LHO Annual Training

	Hourly Wage	Hours	Total Cost
Min.	$40	0	$0
Max.	$105	40	$4,200

Table 17: Routine Inspection: Required Annual School Official Training

	Hourly Wage	Hours	Total Cost
Min.	$42	4	$168
Max.	$133	6	$798

Table 18: Costs for Routine Inspection Per Year: Combined Training Totals

	Total
Min.	**$168**
Max.	**$4,998**

WAC 246-370-050 General Building Requirements

Formerly WAC 246-366-050[22]

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
- Provide accessible drinking fountains

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 can't 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 indeterminate.

Table 19: Labor Costs: One-Time Costs for Install

	Hourly Wage	Hours	Total Costs Per Install
Min.	$64	0.10	$6.40
Max.	$64	0.50	$32.00

[22] (Accessed 12/2024) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-050&pdf=true

Table 20: Consumable Goods: One Time Cost Per Device

Goods	Min.	Max.
Self-Draining Vacuum Breaker[23]	$9	$25
Faucet with inline Vacuum Breaker[24, 25]	$96	$130

[23] (Accessed 4/2025) https://www.homedepot.com/pep/Arrowhead-Brass-Chrome-Fine-Thread-Self-Draining-Vacuum-Breaker-PK1390/202579291?clickid=yybU9B2fAxyKR-R0QhVQ3UGOUks1guWC0XEVUM0&irgwc=1&cm_mmc=afl-ir-2003851-1420157-EdgeBingFlow

[24] (Accessed 4/2025) https://www.amazon.com/American-Standard-8344212-0039999997-Service-Breaker/dp/B00CH4RW44/ref=asc_df_B00CH4RW44?tag=bingshoppinga-20&linkCode=df0&hvadid=79920803409762&hvnetw=o&hvqmt=e&hvbmt=be&hvdev=c&hvlocint=&hvlocphy=&hvtargid=pla-4583520382335840&psc=1

[25] (Accessed 4/2025) https://www.amazon.com/Zurn-Z843M1-RC-Chrome-Plated-Breaker-Handles/dp/B001UOZVDQ/ref=asc_df_B001UOZVDQ?tag=bingshoppinga-20&linkCode=df0&hvadid=80058242473023&hvnetw=o&hvqmt=e&hvbmt=be&hvdev=c&hvlocint=&hvlocphy=&hvtargid=pla-4583657821965601&psc=1

WAC 246-370-070 Indoor Air Quality and Ventilation

Formerly WAC 246-366-080[26]

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 commonly exist in schools.[27]

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 have already developed integrated pest management and radon testing plans. Developing these plans would not be a new cost for all schools, just those without plans.

[26] (Accessed 4/2025) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-080&pdf=true
[27] (Accessed 11/2024) https://www.epa.gov/iaq-schools/reference-guide-indoor-air-quality-schools#IAQRG_Section1

Table 21: Indoor Air Quality: Develop Indoor Air Quality Plan

Labor	Hourly Wage	Hours	One-Time Cost
Min.	$43	8	$344
Max.	$134	10	$4,288

Table 22: Indoor Air Quality: Develop Integrated Pest Management Plan

Labor	Hourly Wage	Hours	One-Time Cost
Min.	$43	0	$0
Max.	$134	10	$1,340

Table 23: Indoor Air Quality: Develop Radon Plan

Labor	Hourly Wage	Hours	One-Time Cost
Min.	$43	0	$0
Max.	$134	10	$1,340

Table 24: Indoor Air Quality: One-time Cost Totals

	One-Time Cost Total
Min.	**$344**
Max.	**$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 indeterminate.

Table 25: Indoor Air Quality: Implement Indoor Air Quality Plan Annual Cost

	Hourly Wage	Hours	Total Annual Costs
Min.	$43	0	$0
Max.	$134	68	$9,112

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.

Table 26: Integrated Pest Management Plan Without Dedicated Staff Annual Costs

	Hourly Wage	Hours	Total
Min.	$43	200	$8,600
Avg.	$80	440	$35,200
Max.	$134	600	$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.

Table 27: Integrated Pest Management Plan with Dedicated Staff Annual Costs

	Hourly Wage	Hours	Total
Min.	$43	5	$215
Avg.	$80	12	$960
Max.	$134	18	$2,052

Table 28: Indoor Air Quality: Annual Cost Totals

	Annual Cost Total
Min.*	**$515**
Max.**	**$77,512**

* Minimum total reflects a school that already has an integrated pest management plan developed and has dedicated staff to implement the plan.

** Maximum total reflects a school that will need to develop an indoor air quality plan and a pest management plan and that does not have dedicated staff to implement the pest management plan.

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 to seven floors and have anywhere from one to 120 classrooms. The data shows at least one school with a single floor and 87 classrooms, which would all need to be tested.

Table 29: Indoor Air Quality: Implement Radon Plan Every Five Years

	Hourly Wage	Hours	5 Year Cost
Min.	$43	1	$43
Max.	$134	50	$6,700

Table 30: Consumable Costs: Radon Testing Every Five Years

	Test Cost	Number of Tests	5 Year Cost
Min.[28]	$12	1	$12
Max.[29]	$16	87	$1,392

[28] (Accessed 4/2025) https://www.homedepot.com/pep/PRO-LAB-Radon-Gas-Test-Kit-RA100/100141467?mtc=SEM-BF-CDP-BNG-D26P-026_005_PUMPS-NA-NA-NA-DSA-NA-NA-NA-NA-NBR-NA-NA-NEW-NA-N2025_LBT&cm_mmc=SEM-BF-CDP-BNG-D26P-026_005_PUMPS-NA-NA-NA-DSA-NA-NA-NA-NA-NBR-NA-NA-NEW-NA-N2025_LBT-21692166716-167614481895-1738649489211&gclid=ccedf711c6ad124e499990fdde1850a1&gclsrc=3p.ds&msclkid=ccedf711c6ad124e499990fdde1850a1

[29] (Accessed 4/2025) https://www.bing.com/shop/productpage?q=radon+test+kits&filters=scenario%3a%2217%22+gType%3a%2212%22+gId%3a%22302571249599%22+gIdHash%3a%220%22+gGlobalOfferIds%3a%22302571249599%22+AucContextGuid%3a%220%22+GroupEntityId%3a%22302571249599%22+NonSponsoredOffer%3a%22True%22&productpage=true&FORM=SHPPDP&browse=true

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.

This report includes all potential costs for schools to conform with WAC 246-370-070(7)(b) of the proposed rule. Many of the total costs in this section will be determined by the size of the school. Since school sizes vary from school to school, some of the total costs to schools will be indeterminate. If we could not determine the total costs to a school, we used a cost per square foot or the total cost of one consumable good.

For ventilation specifically, schools will have 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.

Table 31: Trade Services: One Time Cost

Task	Cost (per sq ft)	Small School	Average School	Large School
Test and Balance	0.81	929 sq ft	77,391 sq ft	367,301 sq ft
	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 a carbon dioxide sensor to monitor carbon dioxide in at least one room. The first year of implementation will take slightly more labor hours to set up the monitoring and tracking system plan.

Table 32: Consumable Goods Ventilation: One-time Cost Per Room

Goods	Min.	Max.
Portable carbon dioxide sensor	$170	$3,425
Fixed carbon dioxide sensor and installation	$2,000	$2,500

Table 33: Labor Ventilation: Develop Carbon Dioxide Monitoring Plan - One Time Cost

	Hourly Wage	Hours	One-Time Cost
Min.	$43	5	$215
Max.	$134	10	$1,340

Table 34: Labor Ventilation: Implementation of Carbon Dioxide Monitoring Plan – First Year Initial Cost

	Hourly Wage	Hours	One-Time Cost
Min.	$43	25	$1,075
Max.	$134	200	$26,800

Table 35: Labor Ventilation: Carbon Dioxide Monitoring Plan - Annual Cost

	Hourly Wage	Hours	Annual Cost
Min.	$43	20	$860
Max.	$134	175	$23,450

Costs: Filtration

This report includes 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 indeterminate. Since we cannot determine the total costs to a school, we used the cost per square foot to comply with this rule.

Consumable Goods Ventilation: Annual Cost

Schools will have 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.*"

   Currently, chapter 51-52 WAC requires the equivalent filtration rate of a MERV 13 filter. Schools typically do not install a filter lower than MERV 8. The estimates below cover the increased cost (per square foot) to replace a MERV 8 with a MERV 13 filter.

Table 36: Consumable Goods Ventilation: Annual Increase Filter Size from MERV 8 to MERV 13

	Cost (per sq ft)	Square Feet	Total
Min.	$0.07	929	$66
Max.	$0.10	367,301	$36,731

Table 37: Consumable Goods Ventilation: Annual Increased Utility Rates Depending on Fuel Source

	Cost (per sq ft)	Square Feet	Total
Min.	$0.01	929	$10
Max.	$0.02	367,301	$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. The TAB process includes visual inspection, functional testing, measuring airflow rates, adjusting system components, and documenting the results.[30] The total cost to schools to perform a TAB will vary from school to school depending on school size and therefore is indeterminate.

Table 38: Trade Services: Once every 15 years

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

Labor: Routine Ventilation Inspections

The proposed rule requires regular filter replacement for mechanical ventilation systems; however, manufacture specifications require filter replacements to ensure that the mechanical ventilation system remains operable. Since this proposed rule does not add a new requirement, we did not include the cost for filter replacement in this fiscal report.

The rule does require “routine” ventilation inspections, which manufacturers usually only recommend but don’t require. Depending on the type of system, the school could complete this task several times a year. The total annual cost to schools is indeterminate, however the costs below cover one inspection per year.

[30] (2/2025) https://bluerithm.com/test-and-balance-tab-of-an-hvac-system-what-it-is-and-why-its-important/

Table 39: Labor Ventilation: Routine Ventilation Inspection

	Hourly Wage	Hours	Per Inspection Cost
Min.	$43	2	$86
Max.	$134	8	$1,072

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 degrees Fahrenheit and that gymnasiums and other “common” areas maintain a minimum temperature of 60 degrees Fahrenheit.

New requirements from WAC 246-370-080

- Sets a maximum indoor temperature of 79 degrees 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 rise above the maximum or fall below the minimum temperature required in WAC 246-370-090 for extended periods of time. Since weather conditions vary geographically and from year to year, each school will customize their readiness plan for their unique circumstances, the total annual cost to implement the plan is indeterminate.

Table 40: Develop Extreme Temperature Readiness Plan

	Hourly Wage	Hours	One-Time Cost
Min.	$65	1	$65
Max.	$133	10	$1,330

WAC 246-370-110 Injury Prevention

Formerly WAC 246-366-050[31]

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

This section requires adequate fall guards when two adjacent occupied areas have a minimum height of 30 inches per chapter 1015.2 of the 2024 International Building Code.[32] Most schools 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 indeterminate.

Table 41: Consumable Goods: One Time Cost

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

Labor Chemical and Cleaning Supply Storage

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 comply. 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.

[31] (Accessed 4/2025) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-050&pdf=true
[32] (Accessed 2/2025)https://codes.iccsafe.org/content/IBC2021P1/chapter-10-means-of-egress#IBC2021P1_Ch10_Sec1015

Table 42: Labor Chemical and Cleaning Supply Storage: One Time

	Hourly Wage	Hours	One-Time Cost
Min.	$43	0	$0
Max.	$134	32	$4,288

Table 43: Labor Chemical and Cleaning Supply Storage: Annual Maintenance

	Hourly Wage	Hours	Annual Cost
Min.	$43	1	$43
Max.	$134	10	$1,340

Fragrance-Free and Low-Hazard Cleaning Supplies

Fragrance-free and low-hazard cleaning supplies compare in price to equivalent supplies with fragrances or those with 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.

Table 44: Labor Animal Safety Plan: One Time Cost

	Hourly Wage	Hours	One Time Cost
Min.	$43	0	$0
Max.	$134	120	$16,080

WAC 246-370-120 Imminent Health Hazard Procedure

New WAC Chapter

This section of the rule requires that a school official take action when they identify an imminent health hazard 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 additional labor hours associated with this requirement when we require school officials to report potential health hazards to their local health department.

Table 45: Additional Labor: Imminent Health Hazard LHO Consulting

	Hourly Wage	Hours	Annual Cost
Min.	$40	1	$40
Max.	$105	100	$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

- School officials must submit plans and consult with their LHO before installing, updating, or modifying playground structures or fall protection surfaces.
- LHOs have 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

LHOs perform playground inspections when schools replace existing equipment or construct a new playground on an existing school 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 with the requirements in the proposed rule language. School officials indicated zero additional labor hours incurred by these proposed rules.

Table 46: Playground Inspections: Additional LHO Hours

	Hourly Wage	Hours	Annual Cost
Min.	$40	0	$0
Max.	$105	3	$315

Table 47: Playground inspections: LHO hourly fees

	Hourly Wage	Hours	Annual Cost
Min.	$100	0	$0
Max.	$250	3	$750

Table 48: 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[33]

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 serve as classrooms with a specific function that uses equipment, furniture, or supplies not found in a standard classroom that pose a potential health or safety risk. This definition 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, such as showers and bathrooms, for school facilities that have health rooms
- Includes emergency shut off for gas and electricity in new construction

Costs

We estimated construction costs 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. Not all schools will need to incur these costs, so a total school cost is indeterminate.

[33] (Accessed 4/2025) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-140&pdf=true

Table 49: 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[34]

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 not regularly used as a school
- Allows an LHO to permit a school to remain in operation during an imminent health hazard event if safe to do so

Costs

Table 50: Labor Variances: Additional LHO Hours

	Hourly Wage	Hours	Annual Cost
Min.	$40	10	$400
Max.	$105	10	$1,050

Table 51: Labor Variances LHO Fees

	Hourly Wage	Hours	Annual Cost
Min.	$100	10	$1,000
Max.	$250	10	$2,500

Table 52: Total Annual 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

[34] (Accessed 4/2025) https://app.leg.wa.gov/WAC/default.aspx?cite=246-366-150&pdf=true

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Implementation Recommendations

The School Environmental Health and Safety Rule Technical Advisory Committee developed an implementation plan using a phased approach. The intent behind this approach balances student health and safety with cost mitigation. The first phase includes sections that did not make substantive changes to the rule, set out basic WAC structures (such as definition and applicability sections), and required the development of plans, such as the extreme temperature readiness plan. Phase two focuses on activities that require collaboration between school officials and local health jurisdictions, such as inspections and assessments. The final phase brings schools into full implementation, including new rule requirements such as specialized rooms.

In addition to the phased approach, the committee stack ranked the requirements in each section or subsection of rule from 1 to 12 to prioritize the greatest health and safety benefits for students (See **Appendix D: Priority Rank for Implementation**). A ranking of 1 indicates the greatest health priority, while items marked as a 12 are primarily process related and have no direct impact on the health and safety of students.

In this portion of the report, committee implementation recommendations are organized by phase and section. Priority ranking is located to the third column of tables 1, 6, and 9 below. This number identifies the overall stack rank based solely on health and safety benefits. The fourth column describes the purpose for the change. The costs for implementation of each section are listed in the subsequent tables organized by item and task. Given the variability in local health jurisdiction programs, and the differences in school district infrastructure and practices, cost information is set out in a range of minimum to maximum costs. Page 2 of *Tab 06_WAC 246-370 School Rule Report_Fiscal Analysis* provides details of the Board's cost assumptions used to calculate the cost to implement the rule.

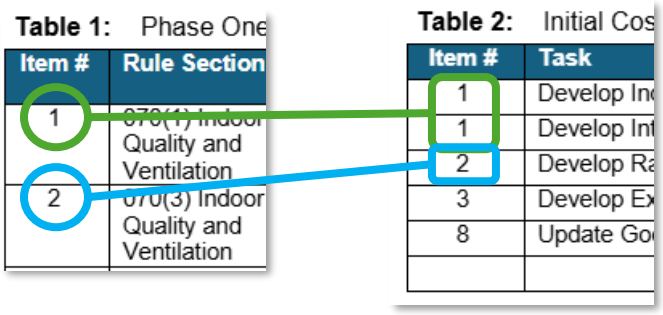

Table 1: Phase One

Item #	Rule Section
1	070(1) Indoor Quality and Ventilation
2	070(3) Indoor Quality and Ventilation

Table 2: Initial Cos

Item #	Task
1	Develop In
1	Develop Int
2	Develop Ra
3	Develop Ex
8	Update Go

The first column (Item #) in the Phase table of each section corresponds with the first column in each of the cost tables.

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Phase One: Planning

1

Table 1: Phase One Section Implementation by Priority

Item #	Rule Section	Priority	Description	Estimated Cost
1	070(1) Indoor Air Quality and Ventilation	4	Describes required components of an indoor air quality plan	See Table Below
2	070(3) Indoor Air Quality and Ventilation	4	Describes requirements for a radon testing plan	See Table Below
3	080(1) Temperature	8	Describes the requirements for developing an extreme temperature readiness plan	See Table Below
4	080(2) Temperature	8	Describes collaboration between school official and local health officer	No Cost
5	050(1)-(9) General Building Requirements	9	Describes existing requirements for school facilities under construction	See Table Below
6	001 Purpose	12	Describes existing requirements for school facilities under construction	No cost
7	010 Applicability	12	Description of what types of facilities this rule applies to and exemptions	No cost
8	015(1)-(4) Good Safety Practice and Guidance	12	Describes how good safety practices are developed, maintained, and updated	See Table Below
9	090 Noise	12	Describes requirements for ensuring safe noise levels within a school facility	No cost
10	100 Lighting	12	Describes requirements for ensuring healthy lighting levels within a school facility	No cost
11	170 Severability	12	Describes the limitations of chapter application when any element is found to be invalid	No cost
12	005 Definitions	12	Terminology related to sections implemented in Phase 1 including “decibel (dB),” “decibel,” “A-weighted (dBA),” “department,” “equivalent continuous sound level,” “foot candle,” “imminent health hazard,” “integrated pest management,” “local board of health,” “local health officer,” “new construction,” “noise abatement,” “noise criterion,” “noise criterion 35 (NC35),” “OSPI,” “portable,” “preschool,” “readiness plan,” “school,” “school facility,” “school official,” “specialized room,” and “transition services”	No cost

Table 2: Initial Costs

Item #	Task	Min	Max
1	Develop Indoor Air Quality Plan	$344	$4,288
1	Develop Integrated Pest Management Plan	$0	$1,340
2	Develop Radon Plan	$0	$1,340
3	Develop Extreme Temperature Readiness Plan	$65	$1,330
8	Update Good Safety and Practices Guide	N/A	$68,243
	Total	**$409**	**$76,541**

Table 3: Annual Costs

Item #	Task	Min	Max
1	Annual Implementation of Indoor Air Quality Plan	$0	$9,112
	Subtotal	**$0**	**$9,112**
With Integrated Pest Management			
1	Integrated Pest Management Plan with Dedicated Staff	$215	$2,052
	Total	**$215**	**$11,164**
1	Integrated Pest Management Plan without Dedicated Staff	$8,600	$68,400
	Total	**$8,600**	**$77,512**

Table 4: Five-Year Costs

Item #	Task	Min	Max
2	Implement Radon Plan Every Five Years	$43	$6,700
2	Consumables for Radon Testing Every Five Years	$12	$1,392
8	Update Good Safety and Practices Guide	N/A	$43,138
	Total	**$55**	**$51,230**

Table 5: One-Time Costs

Item #	Task	Min	Max
5	Install of Backflow Device	$7	$32
5	Backflow Device	$9	$130
	Total	**$16**	**$162**

Phase Two: Collaboration

2

Table 6: Phase Two Section Implementation by Priority

Item #	Rule Section	Priority	Description	Estimated Cost
13	040 Routine Inspection	2	Describes responsibilities of local health officer for ensuring school facilities are inspected according to the requirements and timeline of this section	See Table Below
14	120 Imminent Health Hazard Procedure	3	Describes requirements for identifying, responding to, and communicating imminent health hazards	See Table Below
15	130(1)(a) Playgrounds	5	Describes when consultation with local health officer is required	See Table Below
16	130(1)(c)-(2)(f) Playgrounds	5	Describes expectations for local health officials for the notification and inspection of playground plans and equipment	Included in item 15
17	030 Construction Plan Review New, Alterations, and Portables	7	Describes planning, review, and approval of construction before occupancy	See Table Below
18	020 Site Assessment	10	Describes the requirements for assessing the sites for construction of new school facilities	See Table Below
19	150 Variances and Emergency Waivers	12	Describes a school official's options for requesting a variance or emergency waiver	See Table Below
20	160 Appeals	12	Describes process for submitting and reviewing appeals	No cost
21	005 Definitions	12	Terminology related to sections implemented in Phase 1 including "site assessment"	No cost

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

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Table 7: Cost Per Task

Item #	Task	Min	Max
13	Routine School Inspection: Labor Hours	$40	$1,008
15	Playground Inspections: LHO Cost – No Cost Recovery	$0	$315
15	Playground Inspections Fee: School Cost Charged by LHO – Required Cost Recovery	$0	$750
17	Construction Plan Review: Labor Hours	$0	$13,400
18	ASTM Phase 1 Site Assessment: Vendor Cost	$1,400	$5,000
18	ASTM Phase 2 Site Assessment: Vendor Cost	$10,000	$30,000
18	Site Assessment: LHO Cost – No Cost Recovery	$120	$1,260
18	Site Assessment Fee: School Cost Charged by LHO – Required Cost Recovery	$300	$3,000
18	Site Assessment: School Labor Cost	$96	$26,600
	Total	**$11,956**	**$81,333**

Table 8: Annual Costs

Item #	Task	Min	Max
13	Training – Routine Inspections	$168	$4,998
14	Imminent Health Hazard LHO Consulting	$40	$10,500
19	(1) Variance - LHO Cost – No Cost Recovery	$400	$1,050
19	(2) Variance - School Cost Charged by LHO – Required Cost Recovery	$1,000	$2,500
	Total Including (1) Variance – No cost recovery	**$608**	**$16,548**
	Total Including (2) Variance – required cost recovery	**$1,208**	**$17,998**

Phase Three: Full Implementation

3

Table 9: Phase Three Section Implementation by Priority

Item #	Rule Section	Priority	Description	Estimated cost
22	110 Injury Prevention	1	Describes requirements for mitigating physical and chemical injury and the spread of disease through permitted animals in school facilities	See Table Below
23	11 070(2) Indoor Air Quality and Ventilation	4	Describes requirements to control and ventilate air contaminants	Costs Included in section Phase 1 070(1)
24	070(4)-(9) Indoor Air Quality and Ventilation	4	Describes airborne contaminants and ventilation requirements for controlling them	See Table Below
25	130(1)(b) Playgrounds	5	Describes school officials' responsibilities for installation, maintenance, and operation of playground equipment	Costs assessed in Section Phase 2 130(1)(a)
26	130(3) Playgrounds	5	Describes prohibited chemical treatment of playground equipment	Costs assessed in Section Phase 2 130(1)(a)
27	140 Specialized Rooms	6	Describes requirements for specialized rooms	See Table Below
28	080(1)(a)-(b) Temperature	8	Describes parameters for use when implementing an extreme temperature readiness plan	Indeterminate Cost
29	050(10)-(11) General Building Requirements	9	Describes new requirements for school facilities under construction	Costs assessed in Phase 3 140 or required under building code
30	060 Showers and Restrooms	11	Describes requirements for installing showers and restrooms in new construction	No Cost
31	005 Definitions	12	Terminology related to sections implemented in Phase 1 including "air contaminant," "emergency washing facilities," "emissions," "source capture system," and "stationary machinery"	No cost

Table 10: One Time Costs: Labor

Item #	Task	Min	Max
24	Chemical and Cleaning Supply Storage	$0	$4,288
24	Animal Safety Plan	$0	$16,080
24	Develop CO_2 Monitoring Plan	$215	$1,340
	Total	**$215**	**$21,708**

Table 11: Annual Costs: Labor

Item #	Task	Min	Max
24	Chemical and Cleaning Supply Storage: Labor	$43	$1,340
24	Increased Utility Rates: Consumable Goods	$10	$7,347
24	Increase in Filter Size: Consumable Goods	$66	$36,731
24	1st Year CO_2 Monitoring: Labor	$1,075	$26,800
	1st Year Total	**$1,194**	**$72,218**
24	2+ Year CO_2 Monitoring: Labor	$860	$23,450
	2+ Year Total	**$979**	**$68,868**

Table 12: Every 15 years: Trade Services

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

Table 13: Cost Per Task If Task is Required

Item #	Task	Construction Cost	City Capacity Fee	Per Linear Foot	Min	Max	Total
27	Emergency Eye Wash Install	$4,000	$0				$4,000
27	Emergency Shower Install	$6,000	$0				$6,000
27	Source Capture Ventilation Install	$20,000	$0				$20,000
27	Handwashing Sink Install	$3,000	$1,370				$4,370
27	Bathroom - Toilet Install	$5,000	$4,100				$9,100
27	Bathroom - Urinal Install	$5,000	$3,420				$8,420
27	Emergency Shut Off Valves: Gas Install	$5,000	$0				$5,000
27	Emergency Shut Off Valves: Electric Install	$2,500	$0				$2,500
24	Routine Ventilation Inspection: Labor				$86	$1,072	
24	Portable Carbon Dioxide Sensor Install				$170	$3,425	
24	Fixed Carbon Dioxide Sensor Install				$2,000	$2,500	
22	Fall Protection Guards Install			$350			

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Discussion and Concerns

Throughout the rule development process, the technical advisory committee members discussed and identified several issues and challenges. Many of these issues exceed the scope of the Board's authority to address, but the Board found it important to highlight committee member concerns for policy makers. These items, outlined below, highlight school and public health system challenges across Washington State.

Energy-efficiency measures vs student health

Washington's clean-buildings rule aims to cut greenhouse gases by tightening building envelopes and cutting HVAC run-times. But these energy-saving steps can also reduce fresh-air delivery, upset humidity balance, and encourage mold growth. These measures undermine indoor air quality, put students with asthma at risk, and reduce everyone's comfort and learning. Solving this challenge requires energy managers, facilities staff, public-health experts, and school leaders to work together so health-driven ventilation and moisture standards remain baseline standards as buildings become more efficient. Committee members shared that the clean building performance standards' five-year performance periods don't line up with local bond schedules or capital-budget cycles. The clean buildings rule does allow performance-path options and appeals for alternate compliance plans, yet without clear deadlines and penalty guidance. Rural and small districts worry that they'll have to prioritize fines over classroom resources.

Prioritizing student health, cost savings, mold and pest prevention

Keeping school air clean and dry is essential for health. Proper ventilation, temperature control, and moisture checks prevent mold, pests, and exposure to toxins. When districts update HVAC systems and seal buildings correctly, they often save on utility bills and repair costs. Many schools already run pest-management plans and inspect for damp spots, but those efforts may not be included in state funding formulas, despite their potential to lower long-term operating expenses. The committee recognized that some larger school districts have expertise that can be shared with smaller districts or private schools. However, limited awareness and communication between schools reduces opportunities for identifying the need for assistance or sharing expertise between districts or among public and private schools.

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Local public health varies in program capacity, services, and fee/funding approach

Washington's thirty-five local health jurisdictions differ widely in school rule implementation and support. About twelve jurisdictions run full school-health programs, fourteen offer limited programs or are looking to start a program, and nine have no formal school program. Some local health jurisdictions charge schools fees for inspection programs and others use Foundational Public Health Services dollars or other funding sources to support programing and limit or reduce costs for schools. Neighboring counties may receive very different levels of service.

Funding-model barriers, levy dependence, and school-type differences

The state's prototypical funding model pays schools based on student headcount, not building size, condition, or operating costs. Its assumptions about average facility needs and the cost of staff fall well below what many schools require. When student enrollment drops, budgets shrink while day-to-day and long-term maintenance require the same or a growing level of maintenance as systems age. Public school districts rely on state and local funding formulas and levies. Relying on local levies and property taxes to bridge the gap between state and local funding leads to inequities in district funding and building maintenance. Districts with a more financially stable and higher tax base tend to pass measures more easily than those with a limited tax base. Charter schools get only part of the per-student state allocation and cannot use bonds for major projects; they often turn to small grants or higher-interest bank loans. Private schools depend on tuition, endowments, and donations. Charter and private schools are unable to raise local taxes or use most state funding streams or grants, so they may struggle to implement school environmental health and safety regulations.

Workforce capacity and funding stability

Schools and local health jurisdictions have challenges with workforce retention and recruitment. School maintenance and custodial teams may lack training or expertise for HVAC troubleshooting or mold cleanup. Based on feedback from the committee, schools and jurisdictions struggle to retain skilled workers due to the opportunities for better pay in other industries. Many schools lack resources to identify emerging health issues on site. Jurisdiction, which may charge fees to operate programs, may not have governing body support to charge or increase fees. Stable state funding may enable local health jurisdictions to not be fully reliant on a fee-for-service model to provide support to schools.

Small-school burdens and capacity constraints

Small and rural districts experience additional challenges in funding and workforce capacity related to maintenance teams. Their remote locations make it hard to share technical help regionally. Depending on local levy success, and bond capacity, school boards may need to prioritize funding for student programming over infrastructure needs.

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Lead in drinking water

The committee identified several issues with the requirements for lead testing in schools. The current requirements outlined in the Lead in Water Remediation Grant limit who can complete the testing and specify that the funds available are for reimbursement only. Moreover, funds for replacing fixtures are limited to like-for-like, meaning that a modern, practical bottle filler fixture cannot replace a bubbler-type fountain if using grant funds. Complications have surfaced with the remediation process; occasionally, the remediation increases lead levels due to improper flushing of pipes or not replacing the pipes or the valves that connect the fixture to the plumbing in the wall.

Gaps and emerging school models

During the rule development process, the committee and Board staff identified several areas that will need additional review or consideration. As part of the review, Board staff and some committee members toured school facilities, including an emerging model, outdoor schools. Outdoor schools are school programs, both public and private, that hold classes outdoors most of the time. The current and proposed rules do not directly address these types of schools. The Board needs additional research to determine the best approach for ensuring student health and safety at these school types.

Staff also identified residential boarding schools for additional review. In Washington state, both public and private residential boarding schools have dormitories. While the school facility must meet the standards outlined in the school rules the residential spaces may not be subject to the rule. The Board needs to determine if a separate agency takes responsibility for ensuring health and safety compliance.

Finally, committee members shared concerns about providing appropriate support for schools owned and operated by sovereign Tribal nations. There are nine schools operated by Tribes in the state, and the committee members and Board staff found it important to elevate the concern around appropriate funding for the Tribal schools to ensure health and safety measures.

Appendices

Appendix A: Readiness Plans

1. School Indoor Air Quality Plan

Background

According to EPA, indoor air pollution is among the top five environmental risks to public health. Indoor Air Quality (IAQ) problems in schools may increase respiratory infections, asthma, coughing, eye irritation, headaches, allergic reactions, and other adverse health effects.

Improving IAQ in schools is vital to the comfort and health of students and staff, promotes positive educational outcomes, and decreases school absenteeism.

Purpose of a School IAQ Plan

WAC 246-370-070 requires Washington schools to adopt a written IAQ plan. An IAQ plan refers to a set of written procedures and practices that schools or districts can use to prevent and control IAQ problems.

EPA IAQ Tools for Schools provides model IAQ plans.

Key Points of a School IAQ Plan

- Addresses IAQ training for staff
- Designates key school staff to oversee the IAQ plan
- Periodic walkthrough inspections of the school facilities
- Cleaning and maintenance that addresses dust, mold, and other pollutants
- Chemical management that includes proper storage and disposal of chemicals
- Preventive maintenance including regular inspection of heating, ventilation, and cooling systems to ensure optimal performance
- Procedures to protect students and staff from dust and contaminants during building renovations and construction activities
- A policy for animals and plants
- Responding to complaints and follow-up actions
- Plans to address toxic materials such as mold, asbestos, lead, radon, pesticides, and mercury
- Plans to address poor ventilation, elevated indoor contaminant levels, such as airborne viral outbreaks, and poor outdoor air quality

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2. Radon in Schools

Background

Radon is a colorless, odorless radioactive gas that occurs from the breakdown of the natural element uranium commonly found in rocks and soil. People are exposed to radon gas as it moves though soil and seeps into buildings, including homes and schools where it can become trapped and concentrate to unhealthy levels.

Exposure to radon gas can cause lung cancer. The EPA estimates that radon gas causes 21,000 lung cancer deaths each year making it the second leading cause of lung cancer in the US.

The EPA estimates that more than 70,000 schoolrooms in use today have high radon levels and nearly one in five schools in the nation has at least one schoolroom that exceeds the recommended action level of 4.0 pCi/L to reduce radon.

Testing is the only way to know if radon gas levels are high enough to cause health problems. Testing is relatively simple and inexpensive. The EPA recommends all schools test for radon gas.

Where radon is found at high levels, schools may need to take recommended steps, such as hiring a certified radon mitigation professional, training school staff to identify radon risks, and learning how to maintain radon reduction.

Purpose of a School Radon Plan

A radon plan will include minimum testing requirements for a school or district to meet Chapter 246-370-070 (3) WAC. A well-written plan can help schools determine if radon levels require a retest or action to reduce radon at their school.

Key Points of a School Radon Plan

- Plan written by school to meet their specific needs
- Help ensure testing meets requirements, standards, and protocols
- Help ensure proper steps are taken to reduce radon if needed

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3. School Carbon Dioxide Monitoring and Mitigation Plan

Background

The U.S. Department of Energy has linked bringing adequate outdoor air into classrooms with improved attendance, reduced disease transmission, and better performance for students. Indoor air pollutants in schools include, but are not limited to, dust, pest allergens, infectious disease particles, and emissions from school program activities. Outdoor air flowing through indoor spaces can dilute or remove these and other pollutants.

However, the rate of outdoor air flowing into a room is difficult to measure. Carbon dioxide (CO_2) levels are easier to measure and can be used to approximate outdoor air flow rates. The amount of CO_2 in a classroom increases as occupants exhale. More CO_2 in a classroom may indicate a lack of fresh outdoor air flowing in.

To increase outdoor air, schools may open doors and windows or increase mechanical ventilation. Assessing ventilation through CO_2 level measurement can be especially important in older schools with inefficient or no mechanical ventilation systems.

In addition to outdoor air, schools should control indoor air pollutants and provide filtered air. Appropriate filters can remove particles like wildfire smoke, dust, and pollen. To control indoor air pollutants, schools can choose safer cleaning chemicals, avoid fragranced items, and take measures to prevent the spread of respiratory viruses.

Purpose of a CO_2 Monitoring and Mitigation Plan

A monitoring and mitigation plan outlines how a school or district will measure CO_2. The plan will include the following:

- Specific actions a school can take when indoor CO2 levels begin to rise above recommended levels
- Minimum requirements for a school or district that must meet Chapter 246-370-070 (1)(d) and (7)(b)(iii) WAC for ongoing CO_2 concentration monitoring

Key Points of a CO_2 Monitoring and Mitigation Plan

- Specifications for a CO_2 monitoring device
- How, where, and when to measure CO_2
- Recommended CO_2 levels to approximate enough outdoor air ventilation
- Strategies to increase outdoor air ventilation
- Roles and responsibilities

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4. School Integrated Pest Management Plan

Background

Pests can pose big problems in schools. Mice and cockroaches can trigger asthma, mice and rats transmit infectious diseases, and termites can damage structures making them unsafe. However, pesticides can harm student health and the environment, and they pose risks to children's developing bodies.

Integrated Pest Management (IPM) is a well-established method to control pests by removing sources of food, water, and shelter. When necessary, schools may use the least toxic chemical pesticide. An IPM works to exclude pests from the building and surrounding area by making structural improvements, keeping facilities clean, doing repairs, and educating occupants. An IPM can help schools protect the health and safety of students and staff while reducing costs over time.

Purpose of a School IPM Plan

An IPM plan outlines how a school or district prevents and excludes pests and when it will have to use pesticides. It includes minimum requirements for a school or district to meet Chapter 246-370-070 (1)(c) WAC. It also incorporates best practices to achieve the health and financial benefits of an IPM.

Key Points of a School IPM Plan

- A school or district IPM policy statement
- Roles and responsibilities of a designated coordinator, administrators, and all staff
- Monitoring procedures and pest population thresholds for action
- Prevention and control methods
- Training and communication resources for staff, students, and parents
- Expectations and agreements with contractors
- Links to Washington pesticide regulations

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5. Extreme Temperature Readiness Plan

Background

Extreme heat and cold events are expected to last longer and become more frequent and intense as the climate changes. With rising temperatures, school buildings are heating up, and many are without air conditioning.

A 2020 report from the Government Accountability Office (GAO) estimated 36,000 public schools nationwide were without adequate air conditioning. An estimated 41% of school districts needed to update or replace heating, ventilation, and air conditioning (HVAC) systems in at least half of their schools. The Washington Office of Superintendent of Public Instruction (OSPI) has said that many schools in our state have inadequate HVAC systems.

Children are especially vulnerable to heat-related illness because they are often active and their bodies are still developing (NIHHIS). In addition to health impacts, children's learning is also affected by warming temperatures. The EPA's 2023 report on the health impacts of climate change on children shows that temperature increases of 2 degrees Celsius are associated with 4% reductions in academic achievement per child relative to average learning gains experienced each school year.

Purpose of an Extreme Temperature Readiness Plan

An extreme temperature readiness plan provides detailed steps a school or district can take to respond to extreme indoor temperatures to protect students. It will include minimum requirements for schools or districts to meet Chapter 246-366-090 WAC.

Key Points of an Extreme Temperature Readiness Plan

- How the school monitors indoor temperatures
- Steps to reduce indoor heat and improve ventilation in classrooms
- Elevated indoor temperature to consider action
- Extreme indoor temperature to consider possible facility or room closures
- Staff training to recognize and prevent heat stress and heat illness
- A communication policy to notify parents or guardians and dismiss students early due to extreme temperature

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Appendix B: Environmental Health Specialist Salaries

Table 1: Small jurisdictions (less than 50,000 people)

	Min	Max
1	$62,467	$79,726
2	$55,120	$75,983
3	x	$88,000
4	x	x
5	x	x
6	$51,048	$72,576
7	$71,739	$93,538
8	$61,716	$83,868
9	x	x
10	$60,240	$79,380
11	$69,023	$96,762
12	$59,062	$70,433
13	$70,768	$96,826

Table 2: Medium jurisdictions (50,000 to 99,999 people)

	Min	Max
14	$58,452	$86,064
15	$55,000	$70,000
16	$56,812	$91,410
17	$56,139	$80,350
18	$60,936	$86,077
19	$55,728	$81,852
20	$52,531	$62,784

Table 3: Large jurisdictions (100,000 to 249,999 people)

	Min	Max
21	$62,556	$83,831
22	$55,908	$78,480
23	$48,499	$62,186
24	$78,042	$99,278
25	$64,667	$103,750
26	$56,784	$101,616
27	$53,124	$91,368
28	$59,964	$106,884
29	$64,666	$84,374
30	$58,219	$85,467
31	$61,835	$94,341
32	$65,645	$97,973

Table 4: Extra-large jurisdictions (750,000 people or more)

	Min	Max
33	$100,573	$127,482
34	$52,395	$70,221

Table 5: Overall Salary Ranges

	Min	Max
All jurisdictions	$48,499	$127,482
Mean	$61,322	$86,545
Median	$59,513	$85,467

Appendix C: Construction Cost Estimates

1. Typical Elementary School Construction Cost Per Square Foot (Mechanical Only)

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mechanical **cost opinion**

Typical Elementary School Construction Cost Per Square Foot (Mechanical Only)

BASIS OF OPINION Other — **PREPARED BY** Brian Cawley, P.E. — **DATE** January 8, 2025

JOB NUMBER 23100.xx — **COST MODEL SF** 64,000 — **OVERHEAD & PROFIT** 15%

new construction - mechanical summary	subtotal	OH&P	total	cost per square foot
code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)				
Mechanical Only (Division 23, D30)	$3,835,347.31	$575,302.10	$4,410,649.40	$68.92
150% code minimum ventilation - dedicated outside air system - multizone system (635 CFM/classroom)				
Mechanical Only (Division 23, D30)	$4,026,963.69	$604,044.55	$4,631,008.24	$72.36
Cost Difference	**$191,616**	**$28,742**	**$220,359**	**$3.44**

existing construction - mechanical summary	subtotal	OH&P	total	cost per square foot
existing building - dedicated outside air system - single zone				
Mechanical Only (Division 23, D30)	$855,820.06	$128,373.01	$984,193.07	$15.38
existing building - controls modification - multizone vav system				
Mechanical Only (Division 23, D30)	$267,198.80	$40,079.82	$307,278.62	$4.80
existing building - controls modification - single zone system				
Mechanical Only (Division 23, D30)	$383,358.80	$57,503.82	$440,862.62	$6.89
existing building - controls modification - CO2 sensors				
Mechanical Only (Division 23, D30)	$109,238.80	$16,385.82	$125,624.62	$1.96
existing building - test & balance				
Mechanical Only (Division 23, D30)	$45,308.00	$6,796.20	$52,104.20	$0.81

EXCLUSIONS
1 - Design contingency
2 - Sales tax
3 - Utility charges or upgrades
4 - Escalation

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2. Code Minimum Ventilation - Dedicated Outside Air System - Multizone System (425 CFM/Classroom)

mechanical **cost opinion**

code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)

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BASIS OF OPINION Other — **PREPARED BY** Brian Cawley, P.E. — **DATE** January 8, 2025

JOB NUMBER 23100.xx — **COST MODEL SF** 64000 — **OVERHEAD & PROFIT** 15%

DIVISION 23 description	quantity number	quantity unit	material cost unit cost	material cost total	labor cost unit cost	labor cost total	engineering opinion subtotal	engineering opinion OH&P	engineering opinion total
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.49	31,638	31,638	4,746	36,383
Trailer, Services, Cranes, Rentals Etc.	60	WKS			1,235.85	74,151	74,151	11,123	85,274
Foreman / Non Labor	70	WKS			1,483.02	103,811	103,811	15,572	119,383
Fuel Costs	1	LS			14,830.20	14,830	14,830	2,225	17,055
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.19	11,864	11,864	1,780	13,644
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.62	39,547	39,547	5,932	45,479
SECTION 230512 INDOOR AIR QUALITY - HVAC									
Indoor Air Quality - HVAC	64,000	SF			.06	3,955	3,955	593	4,548
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.25	15,819	15,819	2,373	18,192
SECTION 230548 VIBRATION ISOLATION									
Vibration Isolation	64,000	SF	.93	59,321	.19	11,864	71,185	10,678	81,863
SECTION 230550 SEISMIC CONTROL									
Seismic Control	64,000	SF	.25	15,819	.12	7,909	23,728	3,559	27,288
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.93	59,321	59,321	8,898	68,219

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code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 230700 MECHANICAL INSULATION									
Mechanical Insulation									
Piping system insulation									
Fiberglass									
3/4" pipe, 1-1/2" wall	1,600	LF	2.45	3,915	4.56	7,296	11,212	1,682	12,893
1" pipe, 1-1/2" wall	490	LF	2.62	1,284	4.77	2,337	3,621	543	4,164
1-1/4" pipe, 1-1/2" wall	650	LF	2.85	1,856	5.01	3,253	5,109	766	5,875
1-1/2" pipe, 1-1/2" wall	0	LF	2.99		5.01				
2" pipe, 1-1/2" wall	350	LF	3.30	1,155	5.28	1,847	3,002	450	3,452
2-1/2" pipe, 1-1/2" wall	300	LF	3.53	1,060	5.56	1,668	2,729	409	3,138
3" pipe, 1-1/2" wall	250	LF	3.70	924	5.90	1,474	2,398	360	2,757
4" pipe, 1-1/2" wall	140	LF	4.20	588	7.17	1,004	1,592	239	1,831
6" pipe, 1-1/2" wall	0	LF	4.98		9.08				
Elastomeric									
1" pipe, 1" wall	450	LF	4.19	1,885	6.80	3,059	4,944	742	5,686
Duct system insulation									
Duct Wrap	25,488	SF	.23	5,985	2.60	66,149	72,133	10,820	82,954
Duct Liner	10,000	SF	2.94	29,413	6.07	60,680	90,093	13,514	103,607
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support - Phased	64,000	SF			.31	19,774	19,774	2,966	22,740
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF	.02	1,582	.19	11,864	13,446	2,017	15,463
SECTION 230820 SYSTEM O&M MANUALS									
System O&M Manuals	64,000	SF	.02	1,582	.06	3,955	5,537	830	6,367
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	4.33	276,830	6.18	395,472	672,302	100,845	773,148

mechanical **cost opinion**

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code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 230915 VARIABLE FREQUENCY DRIVES									
Variable Frequency Drives									
Variable Frequency Drives, Enclosed (NEMA 1), 460V									
10 HP	2	EA	3,676.65	7,353	858.92	1,718	9,071	1,361	10,432
SECTION 231123 NATURAL GAS PIPING									
Natural Gas Piping									
Seismic Gas Shut-Off Valve									
Seismic Gas Shut-Off Valve	1	EA	370.76	371	247.17	247	618	93	711
Schedule 40 Black Steel Piping and Fittings									
3/4", Pipe,stl, sched 40, thrded, W/cplgs, &hngrs 10' o.c.,blk	40	LF	5.17	207	10.07	403	610	91	701
50% Fitting cost, 1 per 8 LF	5	/LF	32.75	164	48.61	243	407	61	468
1", Pipe,stl, sched 40, thrded, W/cplgs, & hngrs 10' o.c.,blk	325	LF	5.41	1,759	11.62	3,776	5,535	830	6,365
50% Fitting cost, 1 per 8 LF	40.625	/LF	39.75	1,615	55.00	2,234	3,849	577	4,427
2", Pipe,stl, sched 40, thrded, W/cplgs, & hngrs 10' o.c.,blk	45	LF	14.77	665	17.30	779	1,443	216	1,660
50% Fitting cost, 1 per 8 LF	5.625	/LF	38.62	217	80.95	455	673	101	773
Misc. Valves & regulators	3	/LF	370.76	1,112	197.74	593	1,705	256	1,961
SECTION 232113 HYDRONIC PIPING SYSTEMS									
Hydronic Water Piping									
Black Steel or Copper, w/hngrs at 10' OC, welded or brazed									
3/4", Copper, brazed	1,600	LF	5.55	8,878	11.16	17,856	26,734	4,010	30,744
Fittings, 1 per 10 LF	160	/LF	4.62	740	52.04	8,327	9,066	1,360	10,426
1", Copper, brazed	490	LF	8.53	4,178	12.54	6,145	10,324	1,549	11,872
Fittings, 1 per 10 LF	49	/LF	10.28	504	61.64	3,021	3,524	529	4,053
1-1/4", Copper, brazed	650	LF	14.09	9,158	14.67	9,534	18,691	2,804	21,495
Fittings, 1 per 10 LF	65	/LF	15.84	1,030	66.96	4,352	5,382	807	6,189
1-1/2", Copper, brazed	240	LF	12.73	3,055	16.37	3,928	6,983	1,047	8,031
Fittings, 1 per 10 LF	24	/LF	23.09	554	76.52	1,837	2,391	359	2,749
2", Copper, brazed	350	LF	22.12	7,743	20.19	7,068	14,810	2,222	17,032
Fittings, 1 per 10 LF	35	/LF	36.30	1,270	88.21	3,088	4,358	654	5,012
2-1/2", Copper, brazed	300	LF	31.51	9,454	27.42	8,226	17,681	2,652	20,333
Fittings, 1 per 10 LF	30	/LF	80.12	2,404	151.98	4,560	6,963	1,044	8,008

mechanical **cost opinion**

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code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
3", Steel, welded	250	LF	21.01	5,252	39.54	9,884	15,137	2,271	17,407
Fittings, 1 per 10 LF	25	/LF	69.83	1,746	333.73	8,343	10,089	1,513	11,602
Pipe to Pipe Joint, 1 per 10 LF	25	/LF			141.68	3,542	3,542	531	4,073
4", Steel, welded	140	LF	20.82	2,915	45.91	6,428	9,343	1,402	10,745
Fittings, 1 per 10 LF	14	/LF	102.58	1,436	453.83	6,354	7,790	1,168	8,958
Pipe to Pipe Joint, 1 per 10 LF	14	/LF			170.05	2,381	2,381	357	2,738
VAV Run out piping and valves, 1-1/2" & under	68	EA	296.60	20,169	148.30	10,085	30,254	4,538	34,792
Expansion Tanks									
211 Gallon, Bladder Type, B&G B-800SR	1	EA	8,768.36	8,768	556.13	556	9,324	1,399	10,723
Air Separators with flange, removable head									
Combination Air Eliminator/Dirt Separator, 6"	1	EA	15,448.13	15,448	1,235.85	1,236	16,684	2,503	19,187
SECTION 232116 PIPING SPECIALTIES									
Piping Specialties	1	LS	20,000.00	20,000	6,000.00	6,000	26,000	3,900	29,900
SECTION 232120 HYDRONIC VALVES									
Valves	64,000	SF	.10	6,400	.15	9,600	16,000	2,400	18,400
SECTION 232123 HYDRONIC PUMPS									
Hydronic Pumps									
Base Mounted, Close Coupled									
B&G e1531-2GB 200 gpm @ 125' 15 hp	2	EA	7,349.60	14,699			14,699	2,205	16,904
Pump Suction Diffusers, Cast Iron									
4"	2	EA	1,174.06	2,348	370.76	742	3,090	463	3,553
Pump accessories 3", (2) gate valve(s), balancing valve, check valve,	2	EA	3,577.79	7,156	1,237.70	2,475	9,631	1,445	11,076
SECTION 232300 REFRIGERANT PIPING SYSTEMS									
Refrigerant Piping									
ACR Tubing, Copper Type L, 3/8"	400	LF	1.93	771	3.89	1,557	2,328	349	2,678
ACR Tubing, Copper Type L, 3/4"	50	LF	5.01	250	4.80	240	490	74	564

mechanical **cost opinion**

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code minimum ventilation - dedicated outside air system - multizone system (425 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 232500 WATER TREATMENT SYSTEMS									
Water Treatment Systems									
Chemical Treatment	3,000	GAL	14.21	42,637			42,637	6,396	49,032
Chemical Pot Feeder	1	EA	926.89	927	494.34	494	1,421	213	1,634
SECTION 233100 AIR DISTRIBUTION									
Air Distribution									
Galvanized Steel Ductwork, 22 gauge									
Installed at 10' to 15'									
Over 5000lbs	42480	LBS	2.47	104,998	12.36	524,989	629,987	94,498	724,485
Flexible Ductwork in 5'-0" lengths, 12"dia ave.	200	EA	19.16	3,831	44.49	8,898	12,729	1,909	14,639
Stainless Steel Ductwork, 18 gauge, Welded									
1000lbs to 2000lbs	1500	LBS	4.94	7,415	14.83	22,245	29,660	4,449	34,109
Silencers	8	EA	4,325.48	34,604	1,235.85	9,887	44,491	6,674	51,164
SECTION 233300 AIR DISTRIBUTION ACCESSORIES									
Air Distribution Accessories									
Volume Dampers and Quadrants									
12x12	100	EA	48.82	4,882	28.42	2,842	7,724	1,159	8,883
24x24	100	EA	140.89	14,089	74.15	7,415	21,504	3,226	24,729
VAV Terminal Units, HW Reheat									
6" Inlet	17	EA	970.14	16,492	118.02	2,006	18,499	2,775	21,274
8" Inlet	3	EA	970.14	2,910	118.02	354	3,264	490	3,754
10" Inlet	17	EA	970.14	16,492	118.02	2,006	18,499	2,775	21,274
12" Inlet	14	EA	1,001.04	14,015	118.02	1,652	15,667	2,350	18,017

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JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 233400 AIR DISTRIBUTION EQUIPMENT									
Air Distribution Equipment									
Air Handling Units, Budget from Manufacturer	1	LS	596,590.91	596,591	74,151.00	74,151	670,742	100,611	771,353
Centrifigal Fans									
Inline Centrifugal, supply/exhaust booster									
500 CFM, 10" Diameter Connection	3	EA	1,946.46	5,839	451.09	1,353	7,193	1,079	8,272
1,380 CFM, 12" Diameter Connection	3	EA	1,977.36	5,932	673.54	2,021	7,953	1,193	9,146
1,520 CFM, 16" Diameter Connection	1	EA	2,039.15	2,039	673.54	674	2,713	407	3,120
Roof Mounted Upblast - Kitchen 2000 cfm 3/4 HP	2	LS	3,089.63	6,179	270.65	541	6,721	1,008	7,729
SECTION 233700 AIR DEVICES									
Air Devices	64,000	SF	1.85	118,642	.93	59,321	177,962	26,694	204,657
Large Return Grilles 48x36	4	EA	263.24	1,053	53.76	215	1,268	190	1,458
Louvers	325	SF	247.17	80,330	29.66	9,640	89,970	13,495	103,465
SECTION 234100 FILTERS									
Filters, Panel Type, Spare	508	SF	33.99	17,265			17,265	2,590	19,855
SECTION 235100 FLUES AND STACKS									
Flues and Stacks, per Boiler									
Flues and Stacks, per Boiler, AL294C	2	EA	18,537.75	37,076	1,853.78	3,708	40,783	6,117	46,901
SECTION 235200 BOILERS									
Boilers									
Heating water boiler, condensing									
2000 MBH	2	LS	74,151.00	148,302	6,179.25	12,359	160,661	24,099	184,760
Condensate Neutralization Tube	2	EA	308.96		50.00	100	100	15	115

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JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 238100 PACKAGED HVAC EQUIPMENT									
Packaged HVAC Equipment									
Outdoor Condensing Unit	1	LS	37,075.50	37,076	6,179.25	6,179	43,255	6,488	49,743
1.5 Ton - Ductless Indoor Evap. with Matching Outdoor Cond. Unit	2	EA	3,707.55	7,415	1,853.78	3,708	11,123	1,668	12,791
Condensate Pan Pump	2	EA	247.17	494	123.59	247	742	111	853
SECTION 238200 TERMINAL HEAT TRANSFER EQUIPMENT									
Terminal Heat Transfer Equipment									
Hydronic Fin Tube Units	17	EA	2,039.15	34,666	803.30	13,656	48,322	7,248	55,570
Electric Unit Heater, Commercial, 1.5 kW	14	EA	244.70	3,426	95.78	1,341	4,767	715	5,482
Electric Cabinet Heater, 5 kw	4	EA	2,966.04	11,864	131.00	524	12,388	1,858	14,246
Total Mechanical (Division 23)				1,950,469	656,922	1,884,879	3,835,347	575,302	4,410,649

Board of Health Legislative Report

WAC 246-370 School Environmental Health and Safety Rule

June 2025

3. 150% Code Minimum Ventilation - Dedicated Outside Air System - Multizone System (635 CFM/Classroom)

mechanical **cost opinion**

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JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.49	31,638	31,638	4,746	36,383
Trailer, Services, Cranes, Rentals Etc.	60	WKS			1,235.85	74,151	74,151	11,123	85,274
Foreman / Non Labor	70	WKS			1,483.02	103,811	103,811	15,572	119,383
Fuel Costs	1	LS			14,830.20	14,830	14,830	2,225	17,055
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.19	11,864	11,864	1,780	13,644
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.62	39,547	39,547	5,932	45,479
SECTION 230512 INDOOR AIR QUALITY - HVAC									
Indoor Air Quality - HVAC	64,000	SF			.06	3,955	3,955	593	4,548
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.25	15,819	15,819	2,373	18,192
SECTION 230548 VIBRATION ISOLATION									
Vibration Isolation	64,000	SF	.93	59,321	.19	11,864	71,185	10,678	81,863
SECTION 230550 SEISMIC CONTROL									
Seismic Control	64,000	SF	.25	15,819	.12	7,909	23,728	3,559	27,288
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.93	59,321	59,321	8,898	68,219

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description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 230700 MECHANICAL INSULATION									
Mechanical Insulation									
Piping system insulation									
Fiberglass									
3/4" pipe, 1-1/2" wall	1,200	LF	2.45	2,936	4.56	5,472	8,409	1,261	9,670
1" pipe, 1-1/2" wall	490	LF	2.62	1,284	4.77	2,337	3,621	543	4,164
1-1/4" pipe, 1-1/2" wall	650	LF	2.85	1,856	5.01	3,253	5,109	766	5,875
1-1/2" pipe, 1-1/2" wall	0	LF	2.99		5.01				
2" pipe, 1-1/2" wall	300	LF	3.30	990	5.28	1,583	2,573	386	2,959
2-1/2" pipe, 1-1/2" wall	270	LF	3.53	954	5.56	1,502	2,456	368	2,824
3" pipe, 1-1/2" wall	400	LF	3.70	1,478	5.90	2,358	3,836	575	4,411
4" pipe, 1-1/2" wall	200	LF	4.20	840	7.17	1,434	2,274	341	2,615
6" pipe, 1-1/2" wall	0	LF	4.98		9.08				
Elastomeric									
1" pipe, 1" wall	450	LF	4.19	1,885	6.80	3,059	4,944	742	5,686
Duct system insulation									
Duct Wrap	28,674	SF	.23	6,733	2.60	74,417	81,150	12,173	93,323
Duct Liner	10,000	SF	2.94	29,413	6.07	60,680	90,093	13,514	103,607
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support	64,000	SF			.31	19,774	19,774	2,966	22,740
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF	.02	1,582	.19	11,864	13,446	2,017	15,463
SECTION 230820 SYSTEM O&M MANUALS									
System O&M Manuals	64,000	SF	.02	1,582	.06	3,955	5,537	830	6,367
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	4.33	276,830	6.18	395,472	672,302	100,845	773,148

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JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

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	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 230915 VARIABLE FREQUENCY DRIVES									
Variable Frequency Drives									
Variable Frequency Drives, Enclosed (NEMA 1), 460V									
10 HP	2	EA	3,676.65	7,353	858.92	1,718	9,071	1,361	10,432
SECTION 231123 NATURAL GAS PIPING									
Natural Gas Piping									
Seismic Gas Shut-Off Valve									
Seismic Gas Shut-Off Valve	1	EA	370.76	371	247.17	247	618	93	711
Schedule 40 Black Steel Piping and Fittings									
3/4", Pipe,stl, sched 40, thrded, W/cplgs, &hngrs 10' o.c.,blk	40	LF	5.17	207	10.07	403	610	91	701
50% Fitting cost, 1 per 8 LF	5	/LF	32.75	164	48.61	243	407	61	468
1", Pipe,stl, sched 40, thrded, W/cplgs, & hngrs 10' o.c.,blk	325	LF	5.41	1,759	11.62	3,776	5,535	830	6,365
50% Fitting cost, 1 per 8 LF	40.625	/LF	39.75	1,615	55.00	2,234	3,849	577	4,427
2", Pipe,stl, sched 40, thrded, W/cplgs, & hngrs 10' o.c.,blk	45	LF	14.77	665	17.30	779	1,443	216	1,660
50% Fitting cost, 1 per 8 LF	5.625	/LF	38.62	217	80.95	455	673	101	773
Misc. Valves & regulators	3	/LF	370.76	1,112	197.74	593	1,705	256	1,961
SECTION 232113 HYDRONIC PIPING SYSTEMS									
Hydronic Water Piping									
Black Steel or Copper, w/hngrs at 10' OC, welded or brazed									
3/4", Copper, brazed	1,200	LF	5.55	6,659	11.16	13,392	20,050	3,008	23,058
Fittings, 1 per 10 LF	120	/LF	4.62	555	52.04	6,245	6,800	1,020	7,820
1", Copper, brazed	490	LF	8.53	4,178	12.54	6,145	10,324	1,549	11,872
Fittings, 1 per 10 LF	49	/LF	10.28	504	61.64	3,021	3,524	529	4,053
1-1/4", Copper, brazed	650	LF	14.09	9,158	14.67	9,534	18,691	2,804	21,495
Fittings, 1 per 10 LF	65	/LF	15.84	1,030	66.96	4,352	5,382	807	6,189
1-1/2", Copper, brazed	240	LF	12.73	3,055	16.37	3,928	6,983	1,047	8,031
Fittings, 1 per 10 LF	24	/LF	23.09	554	76.52	1,837	2,391	359	2,749
2", Copper, brazed	300	LF	22.12	6,637	20.19	6,058	12,695	1,904	14,599
Fittings, 1 per 10 LF	30	/LF	36.30	1,089	88.21	2,646	3,735	560	4,296
2-1/2", Copper, brazed	270	LF	31.51	8,509	27.42	7,404	15,913	2,387	18,299
Fittings, 1 per 10 LF	27	/LF	80.12	2,163	151.98	4,104	6,267	940	7,207

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description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
3", Steel, welded	400	LF	21.01	8,404	39.54	15,815	24,219	3,633	27,852
Fittings, 1 per 10 LF	40	/LF	69.83	2,793	333.73	13,349	16,142	2,421	18,564
Pipe to Pipe Joint, 1 per 10 LF	40	/LF			141.68	5,667	5,667	850	6,517
4", Steel, welded	200	LF	20.82	4,165	45.91	9,183	13,348	2,002	15,350
Fittings, 1 per 10 LF	20	/LF	102.58	2,052	453.83	9,077	11,128	1,669	12,797
Pipe to Pipe Joint, 1 per 10 LF	20	/LF			170.05	3,401	3,401	510	3,911
VAV Run out piping and valves, 1-1/2" & under	68	EA	296.60	20,169	148.30	10,085	30,254	4,538	34,792
Expansion Tanks									
211 Gallon, Bladder Type, B&G B-800SR	1	EA	8,768.36	8,768	556.13	556	9,324	1,399	10,723
Air Separators with flange, removable head									
Combination Air Eliminator/Dirt Separator, 6"	1	EA	15,448.13	15,448	1,235.85	1,236	16,684	2,503	19,187
SECTION 232116 PIPING SPECIALTIES									
Piping Specialties	1	LS	20,000.00	20,000	6,000.00	6,000	26,000	3,900	29,900
SECTION 232120 HYDRONIC VALVES									
Valves	64,000	SF	.10	6,400	.15	9,600	16,000	2,400	18,400
SECTION 232123 HYDRONIC PUMPS									
Hydronic Pumps									
Base Mounted, Close Coupled									
B&G e1531-2GB 200 gpm @ 125' 15 hp	2	EA	7,349.60	14,699			14,699	2,205	16,904
Pump Suction Diffusers, Cast Iron									
4"	2	EA	1,174.06	2,348	370.76	742	3,090	463	3,553
Pump accessories 3", (2) gate valve(s), balancing valve, check valve,	2	EA	3,577.79	7,156	1,237.70	2,475	9,631	1,445	11,076
SECTION 232300 REFRIGERANT PIPING SYSTEMS									
Refrigerant Piping									
ACR Tubing, Copper Type L, 3/8"	400	LF	1.93	771	3.89	1,557	2,328	349	2,678
ACR Tubing, Copper Type L, 3/4"	50	LF	5.01	250	4.80	240	490	74	564

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JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 232500 WATER TREATMENT SYSTEMS									
Water Treatment Systems									
Chemical Treatment	3,000	GAL	14.21	42,637			42,637	6,396	49,032
Chemical Pot Feeder	1	EA	926.89	927	494.34	494	1,421	213	1,634
SECTION 233100 AIR DISTRIBUTION									
Air Distribution									
Galvanized Steel Ductwork, 22 gauge									
Installed at 10' to 15'									
Over 5000lbs	47790	LBS	2.47	118,123	12.36	590,613	708,735	106,310	815,046
Flexible Ductwork in 5'-0" lengths, 12"dia ave.	200	EA	19.16	3,831	44.49	8,898	12,729	1,909	14,639
Stainless Steel Ductwork, 18 gauge, Welded									
1000lbs to 2000lbs	1500	LBS	4.94	7,415	14.83	22,245	29,660	4,449	34,109
Silencers	8	EA	4,325.48	34,604	1,235.85	9,887	44,491	6,674	51,164
SECTION 233300 AIR DISTRIBUTION ACCESSORIES									
Air Distribution Accessories									
Volume Dampers and Quadrants									
12x12	100	EA	48.82	4,882	28.42	2,842	7,724	1,159	8,883
24x24	100	EA	140.89	14,089	74.15	7,415	21,504	3,226	24,729
VAV Terminal Units, HW Reheat									
6" Inlet	17	EA	970.14	16,492	118.02	2,006	18,499	2,775	21,274
8" Inlet	3	EA	970.14	2,910	118.02	354	3,264	490	3,754
10" Inlet	0	EA	970.14		118.02				
12" Inlet	31	EA	1,001.04	31,032	118.02	3,659	34,691	5,204	39,895

mechanical **cost opinion**

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150% code minimum ventilation - dedicated outside air system - multizone system (635 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 233400 AIR DISTRIBUTION EQUIPMENT									
Air Distribution Equipment									
Air Handling Units, Budget from Manufacturer	1	LS	675,000.00	675,000	74,151.00	74,151	749,151	112,373	861,524
Centrifigal Fans									
Inline Centrifugal, supply/exhaust booster									
500 CFM, 10" Diameter Connection	3	EA	1,946.46	5,839	451.09	1,353	7,193	1,079	8,272
1,380 CFM, 12" Diameter Connection	3	EA	1,977.36	5,932	673.54	2,021	7,953	1,193	9,146
1,520 CFM, 16" Diameter Connection	1	EA	2,039.15	2,039	673.54	674	2,713	407	3,120
Roof Mounted Upblast - Kitchen 2000 cfm 3/4 HP	2	LS	3,089.63	6,179	270.65	541	6,721	1,008	7,729
SECTION 233700 AIR DEVICES									
Air Devices	64,000	SF	1.85	118,642	.93	59,321	177,962	26,694	204,657
Large Return Grilles 48x36	4	EA	263.24	1,053	53.76	215	1,268	190	1,458
Louvers	325	SF	247.17	80,330	29.66	9,640	89,970	13,495	103,465
SECTION 234100 FILTERS									
Filters, Panel Type, Spare	508	SF	33.99	17,265			17,265	2,590	19,855
SECTION 235100 FLUES AND STACKS									
Flues and Stacks, per Boiler									
Flues and Stacks, per Boiler, AL294C	2	EA	18,537.75	37,076	1,853.78	3,708	40,783	6,117	46,901
SECTION 235200 BOILERS									
Boilers									
Heating water boiler, condensing									
2500 MBH	2	LS	81,566.10	163,132	6,179.25	12,359	175,491	26,324	201,814
Condensate Neutralization Tube	2	EA	308.96		50.00	100	100	15	115

mechanical **cost opinion**

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150% code minimum ventilation - dedicated outside air system - multizone system (635 CFM/classroom)

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 238100 PACKAGED HVAC EQUIPMENT									
Packaged HVAC Equipment									
Outdoor Condensing Unit	1	LS	37,075.50	37,076	6,179.25	6,179	43,255	6,488	49,743
1.5 Ton - Ductless Indoor Evap. with Matching Outdoor Cond. Unit	2	EA	3,707.55	7,415	1,853.78	3,708	11,123	1,668	12,791
Condensate Pan Pump	2	EA	247.17	494	123.59	247	742	111	853
SECTION 238200 TERMINAL HEAT TRANSFER EQUIPMENT									
Terminal Heat Transfer Equipment									
Hydronic Fin Tube Units	17	EA	2,039.15	34,666	803.30	13,656	48,322	7,248	55,570
Electric Unit Heater, Commercial, 1.5 kW	14	EA	244.70	3,426	95.78	1,341	4,767	715	5,482
Electric Cabinet Heater, 5 kw	4	EA	2,966.04	11,864	131.00	524	12,388	1,858	14,246
Total Mechanical (Division 23)				2,058,849	656,922	1,968,115	4,026,964	604,045	4,631,008

mechanical **cost opinion**

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existing building - dedicated outside air system - single zone

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.12	7,909	7,909	1,186	9,096
Trailer, Services, Cranes, Rentals Etc.	12	WKS			1,235.85	14,830	14,830	2,225	17,055
Foreman / Non Labor	12	WKS			1,235.85	14,830	14,830	2,225	17,055
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.06	3,955	3,955	593	4,548
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.19	11,864	11,864	1,780	13,644
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.93	59,321	59,321	8,898	68,219
SECTION 230548 VIBRATION ISOLATION									
Vibration Isolation	64,000	SF	.06	3,955	.06	3,955	7,909	1,186	9,096
SECTION 230550 SEISMIC CONTROL									
Seismic Control	64,000	SF	.06	3,955	.06	3,955	7,909	1,186	9,096
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.43	27,683	27,683	4,152	31,835
SECTION 230700 MECHANICAL INSULATION									
Mechanical Insulation									
Duct system insulation									
Duct Wrap	3,186	SF	.23	748	2.60	8,269	9,017	1,353	10,369
Duct Liner	1,000	SF	2.94	2,941	6.07	6,068	9,009	1,351	10,361

mechanical **cost opinion**

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existing building - dedicated outside air system - single zone

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support	64,000	SF			.19	11,864	11,864	1,780	13,644
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF	.06	3,955	.06	3,955	7,909	1,186	9,096
SECTION 230820 SYSTEM O&M MANUALS									
System O&M Manuals	64,000	SF	.06	3,955	.06	3,955	7,909	1,186	9,096
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	.62	39,547	.62	39,547	79,094	11,864	90,959
SECTION 233100 AIR DISTRIBUTION									
Air Distribution									
Galvanized Steel Ductwork, 22 gauge									
Installed at 10' to 15'									
Over 5000lbs	5310	LBS	2.47	13,125	12.36	65,624	78,748	11,812	90,561
SECTION 233400 AIR DISTRIBUTION EQUIPMENT									
Air Distribution Equipment									
High Efficiency Heat Recovery Units	17	EA	21,071.24	358,211	4,943.40	84,038	442,249	66,337	508,586
SECTION 233700 AIR DEVICES									
Air Devices	64,000	SF	.25	15,819	.12	7,909	23,728	3,559	27,288
Large Return Grilles 48x36		EA	263.24		53.76				
Louvers	76.2	SF	247.17	18,834	29.66	2,260	21,094	3,164	24,259
SECTION 234100 FILTERS									
Filters, Panel Type, Spare	130	SF	33.99	4,403			4,403	660	5,063
Total Mechanical (Division 23)				470,826	622,190	384,994	855,820	128,373	984,193

5. Existing Building - Controls Modification - Multizone VAV System

mechanical **cost opinion**

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existing building - controls modification - multizone vav system

BASIS OF OPINION	Other	**PREPARED BY**	Brian Cawley, P.E.	**DATE**	January 8, 2025
JOB NUMBER	23100.xx	**COST MODEL SF**	64000	**OVERHEAD & PROFIT**	15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.11	7,040	7,040	1,056	8,096
Trailer, Services, Cranes, Rentals Etc.	12	WKS			550.00	6,600	6,600	990	7,590
Foreman / Non Labor	12	WKS			550.00	6,600	6,600	990	7,590
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.28	17,600	17,600	2,640	20,240
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.66	42,240	42,240	6,336	48,576
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support	64,000	SF			.44	28,160	28,160	4,224	32,384
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF	.06	3,520	.06	3,520	7,040	1,056	8,096
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	1.65	105,600	.55	35,200	140,800	21,120	161,920
Total Mechanical (Division 23)				110,348	553,671	156,851	267,199	40,080	307,279

6. Existing Building - Controls Modification - CO_2 Sensors

mechanical **cost opinion**

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existing building - controls modification - CO2 sensors

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.11	7,040	7,040	1,056	8,096
Trailer, Services, Cranes, Rentals Etc.	12	WKS			550.00	6,600	6,600	990	7,590
Foreman / Non Labor	12	WKS			550.00	6,600	6,600	990	7,590
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.28	17,600	17,600	2,640	20,240
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.83	52,800	52,800	7,920	60,720
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support	64,000	SF			.44	28,160	28,160	4,224	32,384
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF	.06	3,520	.06	3,520	7,040	1,056	8,096
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	2.75	176,000	1.10	70,400	246,400	36,960	283,360
Total Mechanical (Division 23)				180,748	553,671	202,611	383,359	57,504	440,863

mechanical **cost opinion**

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existing building - controls modification - CO2 sensors

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.11	7,040	7,040	1,056	8,096
Trailer, Services, Cranes, Rentals Etc.	12	WKS							
Foreman / Non Labor	12	WKS			550.00	6,600	6,600	990	7,590
SECTION 230505 PROJECT CLOSEOUT AND SYSTEM START UP									
Project Closeout and System Start Up	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230513 ELECTRICAL PROVISIONS									
Electrical Provisions	64,000	SF			.11	7,040	7,040	1,056	8,096
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF							
SECTION 230800 COMMISSIONING SUPPORT									
Commissioning Support	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230810 SYSTEMS TRAINING									
Systems Training	64,000	SF			.06	3,520	3,520	528	4,048
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF	.55	35,200	.55	35,200	70,400	10,560	80,960
Total Mechanical (Division 23)				36,428	553,395	72,811	109,239	16,386	125,625
Unit Cost per Sensor									2,512

mechanical **cost opinion**

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existing building - test & balance

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 230500 GENERAL PROVISIONS									
General Provisions									
Permit, Mobilization, Submittals, Bond	64,000	SF			.05	3,200	3,200	480	3,680
SECTION 230510 BASIC MATERIALS AND METHODS									
Basic Materials and Methods	64,000	SF			.05	3,200	3,200	480	3,680
SECTION 230593 TESTING, ADJUSTING AND BALANCING									
Testing, Adjusting and Balancing	64,000	SF			.50	32,000	32,000	4,800	36,800
SECTION 230900 AUTOMATIC TEMPERATURE CONTROLS									
Automatic Temperature Controls	64,000	SF			.05	3,200	3,200	480	3,680
Total Mechanical (Division 23)				1,116	503,688	44,192	45,308	6,796	52,104

mechanical **cost opinion**

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existing building - filters

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** NA **OVERHEAD & PROFIT** 25%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
SECTION 234100 FILTERS									
Filters, Panel Type, MERV 8 per classroom, 3 Sets Filters	12.00	SF	5.09	61			61	15	76
Filters, Panel Type, MERV 13 per classroom, 3 Sets Filters	12.00	SF	9.11	109			109	27	137
MERV 8 cost per building SF (based on 900 SF classroom)	$ 0.09	/SF	Assumes minimum 12 filter order, and 3 sets of filters per year.						
MERV 13 cost per building SF (based on 900 SF classroom)	$ 0.16	/SF	Assumes minimum 12 filter order, and 3 sets of filters per year.						
Price Delta	$ 0.07								
Filters, Panel Type, MERV 8 per classroom, 4 Sets Filters	16.00	SF	5.09	81			81	20	102
Filters, Panel Type, MERV 13 per classroom, 4 Sets Filters	16.00	SF	9.11	146			146	36	182
MERV 8 cost per building SF (based on 900 SF classroom)	$ 0.12	/SF	Assumes minimum 12 filter order, and 4 sets of filters per year.						
MERV 13 cost per building SF (based on 900 SF classroom)	$ 0.22	/SF	Assumes minimum 12 filter order, and 4 sets of filters per year.						
Price Delta	$ 0.10								

Utility Cost Delta
Per yearly BIN Calculation with typical K-12 usage profile for 111,000 SF school: $ 0.02 /YR

9. Existing Building - Guard Rail System

mechanical **cost opinion**

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existing building - guard rail system

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** 64000 **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
C2010 Guardrail System									
Guardrail (without Handrail)									
40" Rail, intermeidate bar, without Handrail	1	LF	154.00	154	150.00	150	304	46	350

10. Emergency Eyewash

mechanical **cost opinion**

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emergency eyewash

BASIS OF OPINION Other | **PREPARED BY** Brian Cawley, P.E. | **DATE** January 8, 2025

JOB NUMBER 23100.xx | **COST MODEL SF** NA | **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 22									
SECTION 224000 PLUMBING FIXTURES									
Plumbing Fixtures									
Fixtures (Includes faucet,fittings,piping & insulation to clg)									
Water Closets, wall mounted with carrier, no tank		EA	3,000.00		930.00				
Urinals		EA	1,000.00		890.00				
Lavs		EA	955.00		880.00				
Sinks		EA	1,200.00		875.00				
Eyewash Stations	1	EA	1,200.00	1,200	800.00	800	2,000	300	2,300
Emergency Shower Stations		EA	1,500.00		700.00				
Mop Sinks, and trim		EA	2,161.00		1,122.50				
Shower, Enclosed HC		EA	2,500.00		600.00				
Electric Water Cooler		EA	2,000.00		600.00				
Hose bibb, Interior and Exterior		EA	350.00		250.00				
Thermostatic mixing valves	1	EA	1,000.00	1,000	480.00	480	1,480	222	1,702
Point of Use TMV		EA	300.00		150.00				
Drain for Emergency Shower		EA	1,200.00		800.00				
Subtotal Division 22				2,200		1,280	3,480	522	4,002

11. Emergency Eyewash Shower

mechanical **cost opinion**

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emergency eyewash shower

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** NA **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 22									
SECTION 224000 PLUMBING FIXTURES									
Plumbing Fixtures									
Fixtures (Includes faucet,fittings,piping & insulation to clg)									
Water Closets, wall mounted with carrier, no tank		EA	3,000.00		930.00				
Urinals		EA	1,000.00		890.00				
Lavs		EA	955.00		880.00				
Sinks		EA	1,200.00		875.00				
Eyewash Stations		EA	1,200.00		800.00				
Emergency Shower Stations	1	EA	1,500.00	1,500	700.00	700	2,200	330	2,530
Mop Sinks, and trim		EA	2,161.00		1,122.50				
Shower, Enclosed HC		EA	2,500.00		600.00				
Electric Water Cooler		EA	2,000.00		600.00				
Hose bibb, Interior and Exterior		EA	350.00		250.00				
Thermostatic mixing valves	1	EA	1,000.00	1,000	480.00	480	1,480	222	1,702
Point of Use TMV		EA	300.00		150.00				
Drain for Emergency Shower	1	EA	700.00	700	800.00	800	1,500	225	1,725
Subtotal Division 22				3,200		1,980	5,180	777	5,957

12. Handsink

mechanical **cost opinion**

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handsink

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** NA **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 22									
SECTION 224000 PLUMBING FIXTURES									
Plumbing Fixtures									
Fixtures (Includes faucet,fittings,piping & insulation to clg)									
Water Closets, wall mounted with carrier, no tank		EA	3,000.00		930.00				
Urinals		EA	1,000.00		890.00				
Lavs		EA	955.00		880.00				
Sinks	1	EA	1,200.00	1,200	875.00	875	2,075	311	2,386
Eyewash Stations		EA	1,200.00		800.00				
Emergency Shower Stations		EA	1,500.00		700.00				
Mop Sinks, and trim		EA	2,161.00		1,122.50				
Shower, Enclosed HC		EA	2,500.00		600.00				
Electric Water Cooler		EA	2,000.00		600.00				
Hose bibb, Interior and Exterior		EA	350.00		250.00				
Thermostatic mixing valves		EA	1,000.00		480.00				
Point of Use TMV		EA	300.00		150.00				
Drain for Emergency Shower		EA	700.00		800.00				
Subtotal Division 22				1,200		875	2,075	311	2,386

13. Bathroom

mechanical **cost opinion**

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bathroom

BASIS OF OPINION Other **PREPARED BY** Brian Cawley, P.E. **DATE** January 8, 2025

JOB NUMBER 23100.xx **COST MODEL SF** NA **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 22									
SECTION 224000 PLUMBING FIXTURES									
Plumbing Fixtures									
Fixtures (Includes faucet,fittings,piping & insulation to clg)									
Water Closets, wall mounted with carrier, no tank	1	EA	3,000.00	3,000	930.00	930	3,930	590	4,520
Urinals		EA	1,000.00		890.00				
Lavs	1	EA	955.00	955	880.00	880	1,835	275	2,110
Sinks		EA	1,200.00		875.00				
Eyewash Stations		EA	1,200.00		800.00				
Emergency Shower Stations		EA	1,500.00		700.00				
Mop Sinks, and trim		EA	2,161.00		1,122.50				
Shower, Enclosed HC		EA	2,500.00		600.00				
Electric Water Cooler		EA	2,000.00		600.00				
Hose bibb, Interior and Exterior		EA	350.00		250.00				
Thermostatic mixing valves		EA	1,000.00		480.00				
Point of Use TMV		EA	300.00		150.00				
Drain for Bathoom	1	EA	700.00	700	800.00	800	1,500	225	1,725
Subtotal Division 22				4,655		2,610	7,265	1,090	8,355

14. Source Capture Hood

mechanical **cost opinion**

HARGIS
1201 third avenue, ste 600
seattle, washington 98101
206.448.3376
www.hargis.biz

source capture hood

BASIS OF OPINION Other | **PREPARED BY** Brian Cawley, P.E. | **DATE** January 8, 2025

JOB NUMBER 23100.xx | **COST MODEL SF** NA | **OVERHEAD & PROFIT** 15%

description	quantity		material cost		labor cost		engineering opinion		
	number	unit	unit cost	total	unit cost	total	subtotal	OH&P	total
DIVISION 23									
SECTION 233100 AIR DISTRIBUTION									
Air Distribution									
Galvanized Steel Ductwork, 22 gauge									
Installed at 10' to 15'									
200lbs to 500lbs	500	LBS	2.00	1,000	10.00	5,000	6,000	900	6,900
SECTION 233400 AIR DISTRIBUTION EQUIPMENT									
Air Distribution Equipment									
Centrifigal Fans									
Inline Centrifugal, supply/exhaust booster									
1,520 CFM, 16" Diameter Connection	1	EA	2,000.00	2,000	2,500.00	2,500	4,500	675	5,175
SECTION 233800 COMMERCIAL HOODS									
Source Capture Process Hood	16	SF	200.00	3,200	200.00	3,200	6,400	960	7,360
Subtotal Division 23				6,200		10,700	16,900	2,535	19,435

Appendix D: Priority Rank for Implementation

On February 6, 2025, the technical advisory committee used the pairwise methodology to stack rank the rule sections based on which provided the greatest health and safety benefits. This approach systematically compares each section with every other section. Members voted on each pair and the total number of votes for each section were tallied to provide the stack ranking (See **Table 7: Stack-Ranked Sections Based on Health and Safety Benefits**).

Note: The committee excluded sections with no direct health or safety benefit, such as purpose, definition, and severability.

Table 6: Stack-Ranked Sections Based on Health and Safety Benefits

Section	# Votes
1. Injury Prevention	114
2. Routine Inspection	101
3. Imminent Health Hazard	98
4. Indoor Air Quality/Ventilation	97
5. Playgrounds	94
6. Specialized Rooms	92
7. Construction Plan Review	73
8. Temperature	70
9. General Building Requirements	65
10. Site Assessment	55
11. Showers and Restrooms	3

School Environmental Health and Safety Rule Project

Technical Advisory Committee Meeting

Hybrid/Tukwila, May 15, 2025

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Zoom Language Channels

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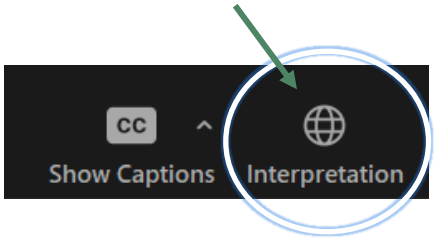
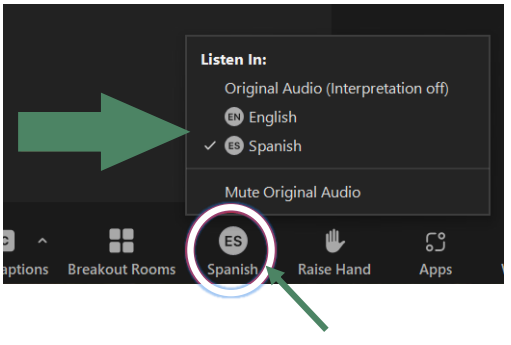
Canales de idioma
Language channels





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Minutes Review

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Reminders

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Today's Objectives

- Review Report Draft
- Discuss FAQ
- Review Playground Cards
- Next Steps

Meeting Packet

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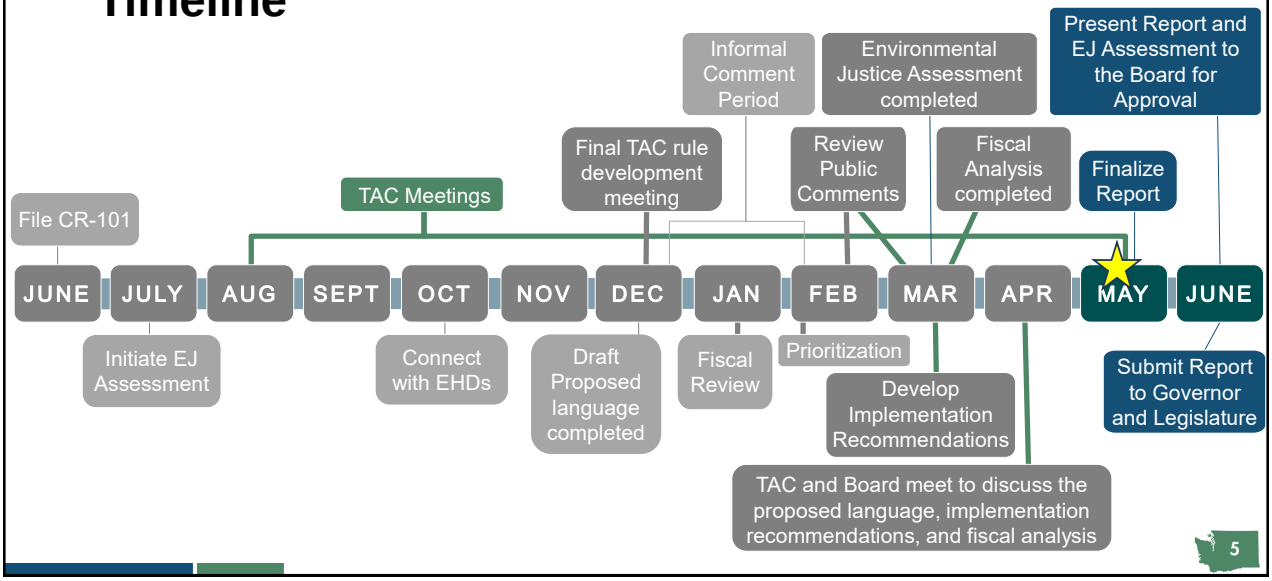
Timeline



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TAC Agreements

- Be respectful of all perspectives and opinions
- Communicate openly and respectfully, disagree without being disagreeable
- Assume positive intent and ask for clarification
- Share the air; allow everyone to share insights, one person speaking at a time
- Ask questions and seek to understand
- Be on time for meetings/calls
- Be present and actively participate (no multitasking during meetings)
- Be efficient with our meeting time
- Meet deadlines and commitments
- Support the final decisions of the TAC
- Stay focused on the goals and objectives of the committee

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Review Report Draft

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Lunch Break
Return at 1:00 p.m.

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Review Report Draft

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Afternoon Break
Return at 3:10 p.m.

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Discuss FAQ

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Review Playground Cards

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Recap/Next Steps

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THANK YOU

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