

Roadmap to the Colorado School Rules & Regulations



COLORADO
Department of Public
Health & Environment

SCHOOL RULES & REGULATIONS

Overview

- Regulation changes and FAQ's
- Inspection form
- Inspection Field Guide and Map
- Chemical Hygiene Plan Template
- Other resources



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Regulation Changes and FAQ's

Variances

- Variance requests for general provisions will be considered, provided that public health is protected.
- Variance requests for the use of prohibited chemicals and storage limitations on restricted chemicals will also be considered, provided that the safety of students and faculty is assured.
- **Variance request application forms must be completed and sent to local LPHA. Please provide your Dept. recommendation with variance request.**
- Requests will be reviewed by CDPHE. Decisions are final and will expire upon a change of circumstance, including changes in responsible personnel or the alleviation of the initial hardship.



Regulation Changes and FAQ's

Public Notice

- Public notice should be used for schools that have not attained compliance and are not showing signs that they are working towards it.
- Any method of notification can be used as long as it effectively communicates concerns to school population and parents.



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Regulation Changes and FAQ's

Sanitizers and Disinfectants

- Same set of approval criteria as those in the Child Care regulation.
- Sanitizers should be applied to surfaces that commonly come into contact with foods, hands, exposed skin, etc:
 - Chairs, desks, tables, keyboards.
- Disinfectant use should be limited to surfaces commonly contaminated with high hazard body fluids:
 - Restroom surfaces, toilets, diaper changing areas.
- Products must be used specifically for intended labeled application.
- Resources for evaluating approval for products is available from the childcare program.
- A number of schools have had difficulty adjusting to new requirement.



Regulation Changes and FAQ's

Radon

- Ensure that radon testing dates are collected at every inspection and recorded on the inspection form.
- Ask if the school has been remodeled/repaired after most recent radon test. Any major alterations made to the school can potentially affect radon levels.
- School should be directed to contact your Dept. or DEHS prior to and after completing work on school to evaluate need for additional radon testing.
- Testing should be completed in accordance with the new AARST Radon testing protocol for schools and large buildings (not EPA guidance).
- **Additional guidance is available from DEHS.**
- **Reduced price test kits available from Air Chek, Inc.**



Regulation Changes and FAQ's

Asbestos

- Ensure that asbestos dates are collected at every inspection and recorded on the inspection form.
- Dates can be obtained from semi-annual asbestos management plan updates or letter from builder or architect certifying that the school was constructed with asbestos free materials.



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Regulation Changes and FAQ's

Carbon Monoxide Alarms

- Should be installed in all areas of the school where fossil fuel-fired heaters and appliances are used:
 - Boiler rooms and kitchens.
- CO alarms are not required in science laboratories using gas/Bunsen burners. Very low risk of CO hazard.
- Ensure that all devices are being tested at least annually and battery-powered devices are tested monthly.



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Regulation Changes and FAQ's

Custodial Areas

- The following items must be provided for custodial chemical products:
 - Safety Data Sheets (SDS) that are maintained and organized to be easy to locate in the event of a spill or accidental exposure
 - A chemical inventory
 - A chemical hygiene plan
 - A copy of these items must be maintained in the primary custodial storage area and in an area away from where the products are stored.



Regulation Changes and FAQ's

High Risk Programs - General Provisions

- ▶ All potentially hazardous chemicals, devices, and equipment must be used in accordance with the product labeling and specific manufacturer's instructions and safety warnings. When available, non-toxic products with the safest materials or those with few or no cautionary statements should be used.
- ▶ Toxic and/or hazardous materials must be stored in accordance with the chemical manufacturer's storage temperature requirements at all times including during school holidays and breaks.
- ▶ **SDS should always be consulted before using product.**



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Regulation Changes and FAQ's

Chemical Inventory

- ▶ All toxic and hazardous materials must be inventoried at least once per year. The chemical inventory must include:
 - The name of the compound
 - The amount of the chemical
 - The year it entered the school
 - **Identification of restricted and prohibited chemicals**
- ▶ A copy of the inventory must be maintained in the area where the materials are used and on file in a location away from the area where they are used.
- ▶ **The school must provide an updated inventory to the local fire department and local emergency planning committee upon request.**



Regulation Changes and FAQ's

Chemical Hygiene Plan

- ▶ A written program that promotes the safe management of chemicals for students, faculty, and staff and promotes a culture of safety within the school. The plan must include procedures for:
 - General laboratory safety
 - Chemical management - procurement, storage, handling, and disposal
 - Spill response
 - Operation and testing of laboratory chemical hoods
 - Operation and testing of other emergency/safety equipment
- ▶ **The requirement for a chemical hygiene plan applies to all areas where hazardous substances are used/stored including science laboratories, art rooms, vocational programs, and custodial storage.**



Regulation Changes and FAQ's

Chemical Hygiene Plan

- CHP Template and Guidance Document
 - Separate templates should be completed for individual areas of the school with different chemical practices (i.e. chemistry lab vs. art room).
 - Effort required of school is very limited - complete tables 1-8 with general information, attach appendices (optional).
 - Completion of appendices are optional but recommended.
 - Sections address all important areas that must be covered by a CHP.
 - Document was designed to be used by all areas of the school with chemicals, not just chemistry labs.
 - Schools can choose to use this template, other available templates (Flinn), or create their own as long as all areas are covered.



Regulation Changes and FAQ's

Chemical Hygiene Plan

- ▶ CHP Template and Guidance Document
 - SOP templates for Restricted Chemicals will be available soon.
 - Organized by chemical hazard class (i.e. flammable, toxic) and fully addresses all important management and handling requirements. School must include SOPs in their CHP or address restricted chemicals using another method.



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Regulation Changes and FAQ's

Safety Equipment - Fire Protection

- A Class D fire extinguisher approved for fires caused by combustible metals (i.e., magnesium, sodium, potassium, etc.) must be provided in laboratories where they are used and/or stored.
 - Sand can also be used as a class D. Flinn sells an inexpensive class D.



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Regulation Changes and FAQ's

- ▶ Quantities of **Restricted chemicals** are now limited to what can be used within one school year. Larger amounts may only be stored as specified by an approved variance.
- ▶ Dates on chemical containers should be reviewed to evaluate length of time the chemical has been in the school.
- ▶ Each restricted chemical must be identified as restricted on the container and in the inventory and hygiene plan. Addressing restricted chemicals on the CHP should include storage, handling, emergency and spill procedures, and waste management.



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Biological Specimens

- ▶ Formaldehyde is a known carcinogen and a prohibited chemical. Schools cannot use formaldehyde to preserve their own specimens, but specimens preserved in formaldehyde may be purchased from chemical suppliers. All specimen containers must be sealed and have a label indicating the preservative used.
- ▶ If the seal on a specimen container is compromised, the school may reseal the container (follow all safety precautions for the chemical preservative that was used) or the specimen may be labeled as waste and prepared for proper disposal.
- ▶ The preservative solution is actually formalin which is a restricted chemical. It is rare to see pure formaldehyde which would be stored as gas in a pressurized canister.
- ▶ Less toxic alternatives are available and should be encouraged. "Carosafe" product from Carolina Scientific is an option.



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Regulation Changes and FAQ's

Art & Set Design and Vocational Areas


- Spray paints and spray fixatives
- Glass etching cream
- Photography chemicals
- Powdered glazes, paints, silica-based clays, plasters, etc.
- Set design programs
- Vocational Arts programs



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Inspection Form



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SCHOOL INSPECTION REPORT FORM

4300 Cherry Creek Drive S., Denver, CO 80246 Page 1 of ____
 (303) 692-3645 Fax (303) 753-6809
www.colorado.gov/cdphe/dehs

<input type="checkbox"/>	Routine High Risk
<input type="checkbox"/>	Routine Low Risk
<input type="checkbox"/>	Self-Cert Audit
<input type="checkbox"/>	Follow-Up
<input type="checkbox"/>	Pre-Operational
<input type="checkbox"/>	Complaint

School _____
 Address _____
 Zip Code _____
 County _____ Firm ID _____ Inspector _____ Month _____ Day _____

Phone _____
 Contact _____
 District _____
 Year _____ Inspection Time _____

Items marked "Out" below identify violations to be corrected as indicated by the regulatory authority. *Critical violations, indicated in red and with an asterisk, shall be corrected immediately or no later than the time specified by the regulatory authority. Failure to comply may result in further action by the regulatory authority.

In	Out	NA	NO	Violations
6.3 Building Design				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3A - Construction Approval
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3B - Swimming Pool Design
6.6 Compliance Procedures				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6A - Inspection Access Granted
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6B - Inspection Results Available
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6C - Closure Condition Not Reported*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6D - Self Certification Returned On Time
6.7 Sanitary Facilities and Controls				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7A - Safe Water Supply*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7B - Water System Design/Testing
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7C - Sewage System*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7D - Refuse
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7E - Pest Management*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7F - Classroom Animals
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7G - Service Animals
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7H - Plumbing Design
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7I - Hygiene*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7J - Sanitary Facilities
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7K - Disease Prevention*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7L - Diapering and Toileting*
6.8 Buildings and Grounds				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8A - Campus Maintained Clean & Safe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8B - Asbestos Management & Control
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Abestos Management Plan Date _____
6.9 Mechanical Requirements				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9A - Electrical Supply
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9B - Lighting
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9C - Ventilation
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9D - Climate Control
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9E - Carbon Monoxide Monitoring
6.10 Equipment and Supplies				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10A - Equipment Design and Maintenance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10B - Body Contact Surface Sanitation*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10C - Maintenance Materials Safety*
6.11 Food Service				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11A - Food Service Operations Licensed*
6.12 Laboratory, Industrial, Art, Vocation				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12A - Instructional Safety*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12B - Instructional Safety Data Sheets*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12C - Chemical Management*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12D - Chemical Hygiene Plan*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12E - Chemical Waste*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12F - Personal Protective Equipment*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12G - Prohibited & Restricted Chemicals*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12H - Safety Equipment*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12I - Ventilation*
6.13 Health Services				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13A - Immunizations*
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13B - Basic Health Services

