Old Greenwich School Building Committee

Safety Fact Sheet: By the Book

The Old Greenwich School Building Committee (OGSBC) and its project team have put together the following fact sheet as a follow-up to materials distributed on October 19, 2023.

Questions	Facts
Will kids be safe during the OGS renovation?	Yes. The highest priority of the OGSBC and its design and construction professionals is the safety of students and staff. Suggestions that kids won't be safe are simply false. The OGSBC selected a team of professionals with proven track records of safely completing school projects. The OGSBC design team is approaching the 50% completion of drawings and specifications for the project. At this point, the design and construction team typically begin developing a detailed construction phasing plan. This plan must go through an exhaustive review and approval process with the State. If any abatement needs to be conducted outside school breaks, it will go through an in-depth review and approval process with all authorities with jurisdiction, including the Fire Marshal, Building Department, Environmental Consultants, and the State of Connecticut Department of Public Health.
Will HAZMAT remediation happen while kids are in school?	As planning continues, the OGSBC and its construction team are aiming to perform hazardous material (HAZMAT) removals when students and staff are not in the building (i.e. breaks, weekends, holidays, and after school hours). As is customary, the final plan will maximize HAZMAT removals during these periods and this plan will be shared when complete, well in advance of construction. The HAZMAT within OGS is consistent with buildings of this era and other phased, occupied school renovations within the State of CT. This project is not unique nor is how abatement will be addressed. *See attached list of projects where HAZMAT removal was conducted in a phased, occupied renovation.* Throughout the State of CT, HAZMAT removals regularly occur safely when schools are in session but only with strict planning, procedures and protocols requiring approval of the State of CT Department of Public Health. There are currently 31 ongoing school projects in the State following these procedures. To date the OGSBC hasn't determined if it will be needed for this project.
How will you ensure that kids will be kept safe?	Throughout construction, the OGSBC construction team will implement and monitor rigorous procedures and protocols to ensure student and staff safety. These will include collection of real time scientific data that ensures conditions within the school are consistent with all applicable standards and are safe. If those conditions are ever deemed not safe, children will not be allowed in the building. *See attached listing of safeguards typically required.*
Are there other options for where students may go to school during the renovation?	The OGSBC will continuously assess options but to date there aren't many. For example we may explore relocating the two Pre-K classes at OGS (35-40 students) to a facility like the new Eastern Greenwich Civic Center to free up swing space. That said, this facility is not large enough for 400+ OGS students. The Ed Specs do not call for portable classrooms but we are open to exploring a few if the construction phasing plan requires additional swing space.
When will this be decided?	The State Dept. of Public Health requires receipt of a HAZMAT removal work plan 30 days prior to construction start. Due to the BET's October 2023 decision to deny construction funds, this will not occur until Spring of 2025. The OGSBC plans to be transparent with the community about the plan well in advance of that.

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List of Recent/Ongoing/Future Phased, Occupied Renovations with HAZMAT Removal

Number of Renovations in Connecticut with Abatement while School is in Session

The OGSBC received the following from the CT Department of Public Health, who provided a list of projects that had applied and been approved for asbestos abatement while school is in session in the State of CT over the past six years. The numbers are counted from October 1 - September 30 of each grant year.

School Year	Number of Projects
2018	32
2019	33
2020	11
2021	22
2022	25
2023	31*

** This number may change with the latest grant report*
Source: Connecticut Department of Public Health

Specific Phased, Occupied Renovations in Connecticut that Required Abatement while School in Session

In addition, the OGSBC project team compiled a list of recent phased, occupied renovations with which they are familiar that required abatement while school was in session.

School	City, State	Grades	Year of Completion
Killingly Memorial School	Killingly, CT	K-4	In process
Bennie Dover Jackson Middle School	New London, CT	6-8	In process
Hotchkiss School	Lakeville, CT	9-12	In process
Windham High School	Willimantic, CT	9-12	In process
Betances Elementary School	Hartford, CT	PK-4	In process
E.B. Kennelly School	Hartford, CT	PK-8	In process
New London High School	New London, CT	9-12	2023
North Stonington Elementary School	North Stonington, CT	PK-6	2020
Francis Walsh Intermediate School	Branford, CT	5-8	2020
Naugatuck Valley Community College	Waterbury, CT	CC	2020
Deans Mill School	Stonington, CT	PK-5	2019
Henry James Memorial School	Simsbury, CT	7-8	2019
Wheeler Middle/High School	North Stonington, CT	7-12	2019
East Hampton High School	East Hampton, CT	9-12	2017
H.C. Wilcox Technical High School	Meriden, CT	9-12	2015
Loomis Chaffee School	Windsor, CT	9-PG	2014
Newtown High School	Newtown, CT	9-12	2011
Annie Fisher Magnet School	Hartford, CT	PK-8	2010
E.C. Goodwin Technical High School	New Britain, CT	9-12	2009
South End Elementary School	Bridgeport, CT	Higher Ed	2009
WF Kaynor Technical High School	Waterbury, CT	9-12	2009
Bethel High School	Bethel, CT	9-12	2009
Brookfield High School	Brookfield, CT	9-12	2008
Amity Middle School-Bethany	Bethany, CT	7-8	2006
Amity Middle School-Orange	Orange, CT	7-8	2006
Frank A. Berry Elementary	Bethel, CT	PK-3	2002
Fairfield College Prep	Fairfield, CT	9-12	1999
Linden Street Elementary School	Plainville, CT	K-5	1999

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Illustrative List of Safeguards Employed During Remediation & Construction

- Abatement during school session must involve a review and approval of documents by the CT Department of Public Health prior to the start of any abatement work.

- The project shall be subject to full-time oversight by a Department of Public Health licensed Project Monitor/Hygienist. No work will be performed on the project unless Project Monitor is physically on site.

- Access to the work area will be restricted during all preparation and abatement activities by physical barriers, constructed hard barriers, and warning signs. Secure fire rated temporary partitions will be constructed to separate students and staff, with the perimeter of partitions sealed air tight.

- When abatement occurs each area will be put under full containment utilizing negative air machines and will be constantly monitored by the hygienist on site. The project monitor will physically inspect the containment barriers, negative air exhaust(s), personnel decontamination systems and waste load out chambers throughout the course of each shift. In addition to re-occupancy air clearance monitoring, the Project Monitor will perform daily background air monitoring outside the abatement areas. Specific locations of placement of air samples shall be developed for each work area or phase.

- The air outside the construction and abatement area will be monitored and sampled on a regular basis by the hygienist. The air sampling will be performed during work area preparation, during HAZMAT removal activities and prior to containment removal and re occupancy (final air tests).
  Air samples will be analyzed by Phase Contrast Microscopy (PCM) using the NIOSH 7400 Method by microscopist(s) listed on the AIHA Asbestos Analyst Registry (AAR). Air samples that exhibit elevated fiber concentrations may be further analyzed by Transmission Electron Microscopy (TEM) utilizing the NIOSH 7402 Method. (See Contingency Plan for elevated fiber results). The NIOSH 7402 Method is capable of distinguishing asbestos fibers from non-asbestos fibers. Elevated fiber levels (above 0.010 fibers/cc) may be the result of construction dust in the makeup air, and not be the result of work practices within containment. The results of the air samples from the occupied portion of the building will be made available to the Department of Public Health, local health department and the school's Principal daily.

Applicable Federal and State Regulations

US Environmental Protection Agency (EPA) Regulations

- NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR part 61, Subpart M)
- ASHARA - Asbestos School Hazard Abatement Reauthorization Act
- AHERA - Asbestos Hazard Emergency Response Act (TSCA Subchapter II)
- Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart E)
- OSHA - 29 CFR 1910.1001 (general industry) and 29 CFR 1926.1101 (construction)

State of Connecticut Department of Public Health (DPH) Regulations

- CT Department of Public Health Regulations Regarding Asbestos in Schools
- CT Department of Public Health - Requests to Perform Asbestos Abatement While School is in Session