Office of Environmental Health and Safety
333 South Beaudry Avenue
Los Angeles, CA 90017
Phone: (213) 241-3199
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OEHS Review of Proposed School Projects

OEHS review of proposed school sites or improvements to existing District facilities is required to ensure the health and safety of students and staff. OEHS review is required for the following types of projects regardless of funding source:

- Proposed new school site
- Expansion, major repair, or modernization of existing school facilities
- Proposed placement of bungalows or other temporary structures at existing school facilities
- Change in use or occupancy of existing facilities
- Proposed lease or use of non-District property for District purposes

OEHS review is not required for minor projects involving routine maintenance and landscaping or other activities which do not have the potential to impact public health, safety, or the environment.

District projects are subject to various federal, state, and local requirements including: California Environmental Quality Act, California Education Code, Public Resources Code, California Code of Regulations, California Occupational Safety and Health Act, Uniform Building Code, Fire Code, Asbestos Hazard Emergency Response Act, and policies adopted by the Board of Education.

1.0 Application for OEHS Review

It is the responsibility of a project proponent to fill out and submit an *Application for OEHS Review* (Attachment 1). Project proponents typically include Facilities Services Division, Charter Division, Adult Education, Early Childhood Education, Leasing and Asset Management Unit, Local Districts, and School Site Administrators.

1.1 Determine Eligibility for Variance

Some projects are eligible for a variance from the OEHS review process. Within 2 weeks of receipt of a complete Application, OEHS will determine if the project qualifies for a variance, and if not, provide the applicant an estimated schedule for the review process. [Note: The minimum review (Section 2.0) duration is approximately 30 days. If preliminary screening indicates that further review is necessary a schedule for completion will be provided by OEHS].

1.2 Define Scope of OEHS Review

The scope of the review depends on the nature of the proposed project and current site conditions, and can range from 30 days to more than one year. The elements of the review could include: assessment of potential sources of soil contamination on and adjacent to the site, the assessment of potential air emissions from industrial facilities in proximity to the site; assessment of potential environmental impacts associated with proposed site activities; physical

inspection of project facilities prior to occupation. OEHS will determine which elements are required based on the nature of the project and existing site conditions. The scope will be carried out in accordance with one or more of sections 2.0 – 5.0 below.

2.0 Preliminary Screening

2.1 Site Screening

A site reconnaissance, review of aerial photographs, and environmental database search is completed to identify all potential sources of risk within one-quarter mile of the Site. The results are compared to the *OEHS Distance Criteria for School Siting* (Attachment 2) to determine the proximity of the project site to any rail lines, pipelines, freeways, landfills, industrial facilities, and high voltage power lines. Based on this screening, certain sites may be precluded from school use. The findings are documented in an OEHS Site Environmental Review (SER). All sources of environmental risk identified in the SER are evaluated further under 3.0 below.

2.2 CEQA Applicability

The proposed project description included in the Application will be reviewed to determine if the project is exempt from the California Environmental Quality Act (CEQA) process. CEQA exemptions are typically granted by OEHS for: minor additions to existing schools involving less than 25% of existing capacity, or the addition of less than 10 classrooms, or no change in use of an existing school facility. If a CEQA exemption is applicable, a Notice of Exemption is filed by OEHS with the County Clerk and the State Office of Planning and Research. *Note: This exemption applies only to the CEQA process, and not to other elements of the environmental review process.*

3.0 Assessment of Identified Sources of Risk to Future School Occupants, and Potential Impacts to the Surrounding Environment

3.1 Site Assessment

3.1.1 SUBSURFACE CONTAMINATION

A Phase I Environmental Site Assessment (ESA) must be completed utilizing the most current ASTM standard. The Phase I ESA will document historic site use that may have impacted the site. Based on the findings of the Phase I ESA, further investigation and intrusive sampling may be required and reported utilizing guidance for performing a Preliminary Environmental Assessment (PEA) issued by the Department of Toxic Substances Control (DTSC).

The PEA characterizes subsurface contaminants and estimates the potential health risk to future site occupants. Prior to conducting fieldwork, a PEA workplan is prepared to identify the objectives for environmental sampling and define the methods by which they will be achieved. The PEA workplan is reviewed and revised in consultation with appropriate parties prior to implementation. Typically, both the workplan and the PEA report are reviewed by DTSC, OEHS, or other environmental authority in order to ensure the quality of the environmental data gathered and conclusions drawn by the investigator. The PEA report recommends one of three options: 1) no further action, 2) further assessment and characterization of risk, 3) development and implementation of remedial action. In addition, there are some sites where the extent of contamination is substantial and the cost and time required to remediate may make the project infeasible. If further assessment is recommended, a supplemental workplan is prepared to fill

remaining data gaps in the assessment. If remedial action is recommended, the process under 4.0 is followed.

3.1.2 OTHER SOURCES OF RISK

For sources of environmental risk identified in step 2.1, one or more of the following specialized studies may be required:

Air Quality Health Risk Assessment (HRA) – to characterize identified sources, calculate emissions, and assess the subsequent health risk.

Pipeline Safety Hazard Assessment (PSHA) – to characterize potential risks from a hazardous material pipeline rupture.

Rail Safety Study (RSS) – to characterize the potential risk from train activities, including derailments.

Electromagnetic Field Exposure Management Plan (EMF Study) – to assess the exposure from EMF from nearby power lines at a proposed school site and within the surrounding community.

Geohazard Report – to assess potential geologic hazards, including the risk from faulting, seismic activity, landslides, liquefaction, flooding, and inundation.

Tank Safety Study – to assess the risk associated with fuel or water storage tanks and reservoir.

The proposed studies should be conducted in consultation with OEHS or appropriate regulatory authority. If the risks evaluated are found to exceed regulatory standards or applicable guidance, the process under 4.0 is followed. The results of these studies are typically reported in the CEQA environmental document, referenced in 3.2. Some sources of risk may preclude the use of the site as a school due to estimated cost, timing, or technical infeasibility of mitigation.

3.2 CEQA

If CEQA review is required as determined in step 2.2, an Initial Study should be conducted to determine the appropriate level of CEQA review and documentation (i.e. Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report).

Negative Declaration (ND) – is prepared when it is determined in the Initial Study that the proposed project will not have a significant effect on the environment.

Mitigated Negative Declaration (MND) – is prepared when it is determined in the Initial Study that the proposed project will have a significant effect on the environment but these effects can be mitigated to below a defined level of significance.

Environmental Impact Report (EIR) – is prepared when it is determined in the Initial Study that the proposed project has the potential to result in significant and unavoidable impacts.

In the case of an EIR or MND, feasible mitigation measures will need to be identified and incorporated as part of the project as referenced in 4.0. Some impacts may preclude the use of the site as a school due to estimated costs, timing, or technical infeasibility of mitigation. Upon completion of the appropriate level of CEQA review and documentation, the document is issued for a 30-45 day public review period. Based on comments received, the document is finalized

and submitted to the Board of Education for adoption/certification. Only after such adoption/certification can the school project be approved. Subsequently, OEHS files the Notice of Determination with County Clerk and the State Office of Planning and Research.

4.0 Remedial Action and Mitigation Measures

If significant risks from subsurface contamination are identified in 3.1.1, a Removal Action Workplan or Remedial Action Plan is prepared and implemented with oversight by OEHS, DTSC or other appropriate regulatory agency. Documentation of the implemented remedial action is included in a Remedial Action Completion Report.

If significant risks form other sources are identified in 3.1.2, mitigation measures will need to be evaluated and documented in a mitigation report.

If significant impacts are identified in 3.2, mitigation measures are included in a Mitigation and Monitoring Reporting Plan to be implemented during the appropriate phase(s) of project development and operation.

5.0 Facility Safety Inspection

Prior to occupancy, a Health and Safety Inspection is conducted following standard OEHS inspection protocols and reported in the Essential Safety Checklist & Approval Form and the Occupancy Approval Criteria for Completed School Projects. It is the responsibility of the project proponent to request the inspection at least 2 months prior to occupancy. Once all occupancy criteria have been satisfied, OEHS will issue a completed Essential Safety Checklist & Approval Form. Deficiencies that do not prevent a school project from opening will be documented by OEHS in a Corrective Action Notice (CAN) that is normally issued after occupancy is approved. Corrective measures must be completed and reported to OEHS at http://www.lausd-oehs.org/fieldoperations_listschools.asp.

[NOTE: All school projects require OEHS inspection and clearance prior to occupancy. See Attachment 3, *Essential Safety Checklist & Approval Form* and Attachment 4, *Occupancy Approval Criteria for Completed School Projects*.]

Attachment #1

Office of Environmental Health and Safety
Attn: Site Assessment Manager
333 South Beaudry Avenue, 20th Floor
Los Angeles, CA 90017
Phone: (213) 241-3199
Fax: (213) 241-6816
Email: OEHS_SiteReviewMgr@lausd.net

Application for Environmental Review

Requested by: _____ _____ **Date:** _____
(Name) *(Signature)*

Office / Department: _____

Received by (OEHS): _____ _____ **Date:** _____
(Name) *(Signature)*

SITE INFORMATION:

Project Name: _____
Site Identification: _____
Alternate Site ID: _____
Location Address(es): _____

PROJECT FUNDING:

Project # / Funding Line: _____
Source of Funding: _____
Project Manager: _____ **Phone No:** _____

PROJECT DESCRIPTION:

☐ New Site ☐ Alteration to Existing District Property

Project Schedule: _____
Type of School: _____
Number of Students: _____
Number of Classrooms: _____
Description of Project: _____

ATTACHED RELEVANT SITE & PARCEL MAPS (REQUIRED)

☐ Site Plan ☐ Parcel Map ☐ Region. Map

Office of Environmental Health and Safety
Distance Criteria for School Siting

Feature	Description	Screening Perimeter[1]	Exclusion Zone[2]	
Rail Line	Active rail lines, easements, and spurs.	1,500 ft	128 ft[3]	
Cellular Phone Antennas	Cellular phone antennas	200 ft	Within or adjacent to site	
High Voltage Power Line	High voltage power lines determined to be 50kv or higher.		Above-Ground	Below-Ground
	➢50 – 200 kv	500 ft	100 ft	25 ft
	➢220 – 230 kv	500 ft	150 ft	37.5 ft
	➢500 – 550 kv	500 ft	350 ft	87.5 ft
Freeway / Major Transportation corridor	Freeways, State highways or designated roadways with more than 100,000 automobile trips per day. Rail lines with high volumes of traffic.	1,500 ft	500 ft	
Reservoirs, Water, or Fuel Storage Tanks	Reservoirs or water or fuel storage tank facilities.	1,500 ft	500 ft	
Hazardous Material Pipelines[4]	Transmission pipelines or industrial distribution pipelines, including those for conveying crude oil, natural gas, or other chemicals characterized as hazardous.	1,500 ft	50 ft	
Oil Field / Oil Production Facilities	Oil field/oil production facilities including existing and former oil wells and oil borings.	1,500 ft	50 ft	
Industrial Site / Superfund	Facilities with a potential to emit hazardous air contaminants or otherwise present a significant risk to school occupants.	1,500 ft	500 ft	
Landfill	Landfills authorized for the disposal of hazardous or non-hazardous wastes.	2,000 ft	500 ft	
Earthquake Faults	Mapped or well-defined active earthquake faults	1,500 ft	50 ft[3]	

[1]For proposed school sites, screening will be conducted within the perimeter to identify any of the features listed in Column 1.
[2]Exceptions can be made if supported by risk assessment and compliant with applicable law.
[3]Habitable school buildings and places of assembly shall be located outside the setback.
[4]Natural gas distribution lines used to service local neighborhoods are excluded.

Revised: 12/10/08

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Attachment #3

Essential Safety Checklist & Approval Form

The purpose of this checklist is to identify ***essential safety requirements*** *to be met prior to occupancy of newly constructed schools or school buildings. A comprehensive listing of federal, state and local regulations dealing with school safety maybe found in the "OEHS Safe School Inspection Guidebook", available at www.lausd-oehs.org.*

Date:	**OEHS Inspector:**
School:	**OAR:**
Designated Area:	**Principal:**

		Y	N	ALT
A.	**Access and Egress**			
1.	Are pathways to and from buildings adequately marked, unobstructed, and free of debris and tripping hazards?			
2.	Are the areas of the campus to be occupied adequately segregated from ongoing construction activity through the use of barricades, fencing or other means?			
3.	Are stairways, halls, and other exit pathways in all building corridors clearly identified with proper signage?			
4.	Are fire doors and associated panic hardware functional?			
5.	Are there at least 2 exit pathways for rooms with an occupant load greater than 50?			
6.	Are designated parking areas for students and staff provided with clear, unobstructed pathways to buildings or other areas of the campus?			
7.	Have student pick-up and drop-off locations been designated and have parents been notified?			
B.	**Building & Room Conditions**			
1.	Is adequate lighting provided in all rooms?			
2.	Are electrical outlets and panels covered, and are other electrical components and wiring properly guarded and functional?			
3.	Has each classroom been provided with a hard-wire or wireless connection capable of calling 911?			
4.	Are flooring materials, walls, and ceilings installed and properly finished?			
5.	Have the HVAC duct leakage test results for passive smoke-control systems been reviewed and accepted by the designer?			
6.	Are rooms properly ventilated and free of significant chemical odors?			
7.	Is potable water available in all buildings?			
8.	Is hot water available in food preparation areas, nurse's office and showers?			
9.	Are classrooms and other areas of the campus clean and free of construction debris?			
10.	Are restrooms available in proper working condition and adequately stocked with toilet paper, soap and paper towels or dryers?			
11.	Has the test and balance report for the HVAC system been submitted by the contractor and reviewed by the Inspector of Record to ascertain that the minimum ventilation rates have been met?			
C.	**Fire Alarm and Suppression Systems**			
1.	Has the Inspector of Record (IOR) notified the local fire department of the new school opening pursuant to Inspection Department Procedure P-13?			
2.	Has the IOR issued a DSA-Form 6 for the buildings to be occupied, indicating the fire alarm and suppression systems are complete?			
3.	Has a local fire department inspection been scheduled by the IOR/OAR to be conducted the week prior to opening? *(Required only if DSA-Form 6 does not indicate 100% completion for fire alarm and suppression systems 30 days prior to opening. Indicate date of scheduled inspection.)*			
4.	Have fire extinguishers been mounted throughout the campus (within 75 feet of classrooms and 25 feet of flammable liquids storage areas)?			
5.	Has the IOR verified that all outstanding smoke barrier requirements have been completed?			
D.	**Emergency Preparedness**			
1.	Are basic first-aid kits provided and readily accessible?			
2.	Has an emergency evacuation plan been prepared and posted?			
3.	Has staff been informed of their roles and responsibilities during emergencies and aware of the evacuation plan?			
E.	**Clearance for Occupancy**			
1.	Has the Owner's Authorized Representative (OAR) issued a *Certificate of School Functional Readiness,* and has the IOR issued a DSA-Form 6 indicating the facility or designated locations are ready for occupancy?			
2.	Has OEHS assessed compliance with the above requirements and determined the designated areas are safe to occupy?			

Signature: _____ **Date:** _____

Revised 09/06/06

Attachment #4

Los Angeles Unified School District
Office of Environmental Health and Safety

Occupancy Approval Criteria for Completed School Projects

Newly constructed schools, additions, or other school projects which add classrooms shall not be approved for occupancy until:

1. The Inspection Department issues a DSA Form 6 indicating the Fire Alarm / Fire Suppression Systems are 100% complete; and

2. OEHS issues an Essential Safety Checklist & Approval Form indicating all essential safety requirements have been met.

Exceptions to this requirement can be made for defined areas of the school if the Inspection Department and OEHS determine those areas are safe and ready for occupancy, and the local fire authority concurs. Sufficient time must be provided when requesting concurrence from the local fire authority. Accordingly, if the DSA Form 6 does not indicate 100% completion for the FA/FS system 30 days prior to the scheduled school opening, the IOR or OAR must immediately schedule a local fire department inspection to be conducted during the week prior to opening day.

For projects where DSA approval is not required, exceptions to this requirement can be made by the Chief of the Inspection Department and the Director of OEHS or their designees.