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April 7, 2014

Rick Plew  
Indoor Air Program  
Environmental Public Health Division  
2 North Meridian Street  
Indianapolis, Indiana 46204

**RE: Clay Community School's response to the IAQ Evaluation by ISDH**

Dear Mr. Plew:

The purpose of this letter is to serve as the response from Clay Community Schools (CCS) in accordance with the requirements for resolving the issues identified in your recent air quality evaluation requested by a citizen of Clay City Jr./Sr. High School located in Clay City, Indiana.

*1) 410 IAC 33-4-6 (c): states “when a water leak or intrusion is discovered, corrective action shall be taken within forty-eight (48) hours”. Visible water staining was observed on the ceiling tile inside the band room and room 104/105. A thorough visual exam should be done above the ceiling plenum inside these rooms. Steps should be taken to address the water intrusion problem underneath the exterior door inside the band room. The underside of the carpet should be inspected for mold growth inside the band room.*

CCS Response:

The water intrusion issue in the band room is being address by a roofing contractor where guttering needs to be repaired and additional guttering potentially installed to divert the rainfall runoff from entering the band room. Plans also are to remove the carpet as soon as the school year is completed, allow the area to dry where necessary, and install new carpet in the affected area. The water intrusion issue in room 104/105 will be addressed by identifying the access point of the moisture and repairing the wall or addressing the exterior sidewalk that may be causing the water to runoff towards the building, instead of towards the grass courtyard area. These activities should be completed prior to the start of school in August 2014.

2) **410 IAC 33-5 a)** states “**Schools shall establish and maintain a written procedure for routine maintenance of HVAC systems**”. *This procedure shall include, but is not limited to the following items: 1) A schedule for inspecting the HVAC system including an annual inspection. 2) Ensuring that all supply and return air pathways in the ventilation system are unobstructed and perform as required. 3) A schedule for cleaning the HVAC coils annually at a minimum. 4) A schedule for inspecting and changing filters.*

CCS Response:

Accumulation of records and documents are gathered to demonstrate this activity has taken place in past years. Additional written procedures are being developed to document the activities of what the maintenance staff is currently conducting on a regular basis. The procedures are expected to be finalized by the end of April 2014. Copies of procedures will be available for the ISHD is necessary.

3) **410 IAC 33-5 b)** states “**Schools shall establish and maintain written maintenance logs covering cleaning and filter changes of the HVAC systems for a minimum of three (3) years. These logs shall be available for the state inspector’s review.** *These written procedures and logs do not have to be maintained on site, but there needs to be a means of making them available for our inspector’s review.*

CCS Response:

Maintenance staff currently replaces filters on a regular/routine basis. Log sheets are being developed on a per school basis, whereas the date, time, and who replaced each filter will be identified for an inspector’s review. Also, all filters will be dated and initialed when being replaced in all HVAC systems.

4) **410 IAC 33-4-9:** states “**furniture in classrooms shall be maintained so as to prevent the accumulation or growth of allergens**”. **The Sanitary Schoolhouse rule states “all furniture and equipment used in any school building or a part of a building used for school purposes shall be durable and easily cleanable”.** *We observed some residential style furniture inside room 104/105 that may not meet the definition of easily cleanable*

CCS Response:

All classrooms will be visited by April 18, 2014 by maintenance and/or custodial personnel to identify what furniture and/or equipment needs to be removed from each school. Each school principal will then be notified as to what rooms need to have items removed or disposed of in order to maintain compliance with indoor air quality requirements.

If you have any questions or would like to have further discussion on any of the remedies being developed or implemented please do not hesitate to contact me at your convenience.

Sincerely,

Michael R. Howard II  
Director of Extended Services  
Clay Community Schools