HEALTHCARE FACILITY HUB • SCHOOL REOCCUPANCY SERIES

School Smoke Reoccupancy File Pack: 2026–2028 Gap Checklists & Logs

WORKING FILE PACK

Current version — Nov 1, 2026. Update history: https://healthcarefacilityhub.org/school-reoccupancy-wildfire-smoke-no-standard/

OPERATIONAL EXECUTIVE PURPOSE & REGULATORY CONTEXT

Between September 15, 2026 (passage of California AB 1642) and July 1, 2028 (deadline for DTSC advisory school guidance), California Local Educational Agencies (LEAs) face an operational void: **there is no state indoor air quality standard or pass-fail clearance line for schools**. Health & Safety Code § 25402.3 establishes an interim numeric standard (5/40/100 µg/ft² lead dust) for residences only. This working file pack translates the published 2025 recovery record (CDE recovery protocols, LA County Public Health FAQ, Pasadena Public Health soil guidance, and LAUSD 11-school triage) into five fillable, auditable operational records.

FILE PACK CONTENTS & WORKFLOW MAP

Tool / Section	Statutory / Precedent Source	Operational Deliverable & Retention Function
Tool 1 (Page 2) Ventilation & Filter Log	CDE Recovery FAQ (Aug 25, 2026) OEHHA AQI Guidelines	Records 24-hour continuous outdoor air flush and MERV-8 / MERV-13 filter change-outs with equipment airflow/pressure limit verifications.
Tool 2 (Page 3) HEPA Clean & Ozone Ban	CDE Recovery FAQ Formaldehyde & Particle Rules	Room-by-room ash sweep, HEPA vacuuming, and wet-cleaning verification for classrooms, desks, toys, athletic gear, and fountains; mandatory Ozone Generator Ban.
Tool 3 (Page 4) Standing vs. Burned Triage	LAUSD Palisades Pattern (11 Schools) LA County PH March 2025 FAQ	Decision matrix routing campus to Track A (Standing: clean, filter, monitor) vs. Track B (Burned: construction project, soil excavation, hazardous removal).
Tool 4 (Page 5) Clearance File Template	HSC § 25402.6 Categories Fleet Clearance Standard	Board- and insurer-ready reoccupancy minute recording licensed testing personnel, sampling results, comparison values chosen and justification, and open decision.
Tool 5 (Page 6) Do-Not-Borrow Minute	HSC § 25402.3 (Houses-Only) 40 CFR § 745.227 Lead Dust	Formal governing board disclosure documenting that residential 5/40/100 does not apply to schools and establishing voluntary local policy basis if referenced.

FACILITY INFORMATION & INCIDENT RECORD HEADER

School District / LEA:		**County / Region:**	
Campus / Facility Name:		**CDS Code:**	
Wildfire Incident Name:		**Incident Date(s):**	
Facility Director / Lead:		**Contact Phone / Email:**	

DOCUMENT RETENTION & AUDIT RULE:

Retain this completed file pack in the permanent District Risk Management and Environmental Safety archives for a minimum of five (5) years following incident resolution. Provide copies to the Governing Board, local public health officials upon inquiry, and property/casualty insurance adjusters.

TOOL 1: 24-HOUR VENTILATION & HVAC FILTER REPLACEMENT LOG

California Department of Education Recovery FAQ (Aug 25, 2026) Standard

VENTILATION & FILTRATION

MANDATORY CDE PREREQUISITE:
Do not initiate indoor ventilation until local outdoor air quality is verified satisfactory via local air monitoring. Continuous ventilation must run for a minimum of 24 consecutive hours prior to student or staff reoccupancy. Replace HVAC filters with at least MERV 8, or MERV 13+ where equipment motor capacity permits.

PART A: OUTDOOR AIR VERIFICATION & 24-HOUR CONTINUOUS FLUSH LEDGER

Building / Zone	Outdoor AQI at Start	Flush Start (Date/Time)	Flush End (Date/Time)	Outdoor AQI at End	24h Met?
					☐ Y ☐ N
					☐ Y ☐ N
					☐ Y ☐ N
					☐ Y ☐ N
					☐ Y ☐ N

PART B: HVAC FILTER REPLACEMENT & SYSTEM LIMIT VERIFICATION LOG

AHU Unit #	Location / Service Area	Pre-Fire Filter	New Filter MERV	System Limit Verified?	Date Installed	Technician Signature
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		
			☐ 8 ☐ 13 ☐ 14+	☐ ΔP within fan limit		

SIGN-OFF & CERTIFICATION

HVAC Lead / Contractor:		**Lic / Cert #:**	
Certification Statement:	*I certify that all listed air handling units operated continuously for ≥24 hours under satisfactory outdoor air conditions, that fresh MERV-rated filters were installed, and that static pressure limits were verified.*		

TOOL 2: HEPA VACUUM & WET-CLEAN CLASSROOM CHECKLIST

Indoor Particle Remediation & Toxic Deodorization Prevention Sheet

SURFACE DECONTAMINATION

> **⚠ CRITICAL SAFETY WARNING: STRICT OZONE GENERATOR BAN**
>
> **CALIFORNIA DEPARTMENT OF EDUCATION DIRECTIVE:** Do NOT use ozone generators to deodorize classrooms, offices, or facilities after wildfire smoke events. Ozone reacts chemically with indoor smoke condensates and organic compounds to form **formaldehyde** and hazardous **ultrafine particles**, severely worsening indoor air quality and creating long-term respiratory hazards for children and staff.

CLASSROOM, OFFICE & COMMON AREA SURFACE CLEARANCE LOG

Room / Area #	Gentle Ash Sweep	HEPA Vacuum Surfaces	Wet-Clean Floors & Desks	Wet-Clean Bookcases	Sanitize Toys / Athletic	Drinking Fountains
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed
	☐ Done	☐ Done	☐ Done	☐ Done	☐ Done / N/A	☐ Done / Flushed

CLEANING EQUIPMENT & METHOD COMPLIANCE VERIFICATION

HEPA Vacuum Equipment Used:	Certified True HEPA Vacuums (99.97% @ 0.3 micron) • Models/SN: _____
Cleaning Solutions / Wet Methods:	Neutral detergent / microfiber wet-wiping • Wet-mopping with clean water rinse
Ozone Ban Attestation:	☐ **VERIFIED:** Zero ozone-generating devices or thermal fogging deodorizers were utilized on this facility.
Custodial Lead Signature:	Date: _____ Name: _____ Sig: _____

TOOL 3: STANDING-SCHOOL VS. BURNED-SCHOOL TRIAGE SHEET

LAUSD 11-School Palisades Framework & LA County Public Health Triage

INCIDENT TRIAGE

THE LAUSD 11-SCHOOL PATTERN:
In the January 2025 fires, LAUSD evaluated 11 campuses. Standing schools (8) showed no significant health risk (minor isolated arsenic/lead exceedances mitigated) and reopened on cleaning, MERV 13 filtration, and monitoring. The burned schools (3) were heavy construction/civil projects requiring thousands of tons of soil excavation. The distinction is the governing operational pattern.

PART A: STRUCTURAL & DEBRIS PROXIMITY TRIAGE ASSESSMENT

Triage Evaluation Criterion	Observed Campus Condition	Operational Triage Classification
Direct Structural Impact	☐ Zero structural combustion / smoke only ☐ Partial / minor outbuilding burn ☐ Major structural loss / building burn	☐ **TRACK A (Standing):** Clean, filter, monitor ☐ **TRACK B (Burned):** Civil construction / closure
Distance to Uncleared Debris (LA County PH FAQ criterion)	☐ > 1,000 feet from burned structures ☐ 200–1,000 feet from debris operations ☐ < 200 feet / adjacent to active burn ash	☐ Low track-in risk; standard HVAC controls ☐ Soil testing recommended; perimeter mats ☐ High track-in risk; close dirt areas & test soil
Pasadena Soil Guidance Check (April 15, 2025 precedent)	☐ Exposed dirt athletic fields on campus ☐ Active school gardens / student plots ☐ Campus in mapped county soil study zone	**Interim Actions Required:** ☐ Close dirt fields & school gardens ☐ Install entryway track-in barriers ☐ Enforce student handwashing & daily wet-mop

PART B: TRACK ASSIGNMENT & SCOPE DETERMINATION

TRACK A: STANDING CAMPUS (OPENING TRACK)

- 24-hour outdoor air flush executed.
- Filters replaced to MERV 8 / MERV 13.
- Full interior HEPA vacuum & wet-clean.
- Baseline dust/air spot check (isolate any minor spikes).
- Outdoor AQI monitoring controls student outdoor activity.

Status: Reoccupancy Permitted Upon Tool 4 Completion.

TRACK B: BURNED CAMPUS (CONSTRUCTION TRACK)

- Campus remains closed to general occupancy.
- Retain licensed environmental engineering firm.
- Soil core sampling across DTSC 80 ppm lead threshold.
- Soil excavation, removal, and clean cap construction.
- Complete structural abatement under Cal/OSHA & NESHAP.

Status: Placed on Capital Construction Remediation Track.

FORMAL TRIAGE DETERMINATION

Determined Triage Path:	☐ **TRACK A — STANDING CAMPUS** (Proceed with clearance file) ☐ **TRACK B — BURNED / REMEDIATION CAMPUS** (Refer to capital construction)
Facility Director Sign-Off:	Date: _____ Name: _____ Sig. _____

TOOL 4: SCHOOL SMOKE REOCCUPANCY CLEARANCE-FILE TEMPLATE

HSC § 25402.6 Categories & Board-Defensible Reoccupancy Record

CLEARANCE RECORD

WRITING THE CLEARANCE FILE IN AN UNREGULATED ENVIRONMENT:
Because California has no indoor air standard for schools, defense lies entirely in the documented record: who sampled, what testing scopes were executed, what comparison values were chosen and why, what physical filtration and cleaning occurred, and the formal operational basis for reopening.

1. SAMPLING COMMISSIONED & APPROPRIATELY LICENSED PERSONNEL (HSC § 25402.6)

Testing Scope	Contractor / Consultant	License / Credential Type	License # & Expiration
Industrial Hygiene / Air		CIH / CAC / Environmental	
Surface Dust Sampling		CDPH Lead Assessor / IH	
Soil Sampling (if near debris)		Professional Engineer / PG	
Analytical Laboratory		AIHA-LAP / ELAP Accredited	

2. SAMPLING RESULTS & COMPARISON VALUES CHOSEN (WITH JUSTIFICATION)

Media Sampled	Observed Lab Result	Comparison Value Chosen	Justification for Value Selection
Interior Dust (Lead)			See Tool 5 Disclosure Minute
Soil (Lead - gardens/dirt)		DTSC 80 ppm screening threshold	Evaluation trigger per Pasadena PH 2025 precedent
Outdoor / Indoor AQI		OEHHA School AQI Guidance	State Get Smart wildfire activity tier framework
Asbestos (if suspect)		Cal/OSHA construction / NESHAP	Building material fire damage screening

3. SUMMARY OF CLEANING & FILTRATION ACTIONS EXECUTED

24-Hour Building Flush:	Completed per Tool 1 on date: _____ across _____ Air Handling Units.
Filtration Upgrade:	Installed fresh filters rated: ☐ MERV 8 ☐ MERV 13 ☐ MERV 14+ across all occupied zones.
HEPA & Wet Surface Decon:	Completed room-by-room sweep, HEPA vacuum, and wet-cleaning per Tool 2 on date: _____.
Ozone Generator Prohibition:	Attested: Zero ozone devices used. No formaldehyde or ultrafine particle generation.

4. DEFENSIBLE REOCCUPANCY DETERMINATION & AUTHORIZATION

Determination Basis:	*Based upon satisfactory outdoor air quality, verified completion of 24-hour mechanical flush, installation of fresh MERV-rated filtration, comprehensive HEPA and wet-surface decontamination, and absence of actionable contamination exceeding comparison values, this facility is deemed ready for general reoccupancy.*		
Facility Director Signature:		**Date:**	
Superintendent / Designee:		**Date:**	

TOOL 5: DO-NOT-BORROW FORMAL DISCLOSURE MINUTE

District Executive Minute & Statutory Non-Borrowing Clarification

STATUTORY MINUTE

GOVERNING STATUTORY MANDATE:
California Health & Safety Code § 25402.3 enacted under AB 1642 applies solely to "*residential properties located within a wildfire impact zone.*" It does not govern schools. Guidance for schools under HSC § 25402.6 is advisory, nonregulatory, and due July 1, 2028. Any use of residential dust-lead numbers on campus must be minuted as a voluntary internal benchmark.

FORMAL DISTRICT GOVERNING MINUTE / BOARD RESOLUTION LANGUAGE

RESOLUTION OF THE GOVERNING BOARD / EXECUTIVE FACILITY COUNCIL OF:

DISTRICT / LEA NAME: _____

REGARDING WILDFIRE SMOKE REOCCUPANCY CRITERIA AND CALIFORNIA HEALTH & SAFETY CODE §§ 25402.3 AND 25402.6:

WHEREAS, California Assembly Bill 1642 (Chapter 239, Statutes of 2026) enacted Health and Safety Code Section 25402.3, establishing interim clearance standards for wildfire-caused lead dust (5 µg/ft² on floors, 40 µg/ft² on interior window sills, 100 µg/ft² on window troughs) and asbestos solely for residential properties; and

WHEREAS, Health and Safety Code Section 25402.6 directs the Department of Toxic Substances Control (DTSC), in consultation with the California Department of Education, to develop advisory, nonregulatory guidance for Local Educational Agencies no later than July 1, 2028, and expressly creates no statutory pass-fail clearance number for schools; and

WHEREAS, the standing policy of the California Department of Education confirms that there is no state indoor air quality clearance standard for school campuses; and

WHEREAS, the District's facility leadership has executed physical exposure controls, including 24-hour mechanical ventilation, MERV-rated filtration replacement, HEPA vacuuming, and wet-cleaning of all exposed surfaces without the use of ozone generators;

NOW, THEREFORE, BE IT RESOLVED AND MINUTED:

1. **Non-Regulatory Benchmark Status:** That if the District or its environmental consultants reference the residential lead dust action levels of 5/40/100 µg/ft² or asbestos NESHAP criteria during campus evaluation, such values are adopted exclusively as a *voluntary, internal operational benchmark* and *not* pursuant to any state statutory or regulatory clearance requirement governing school facilities.
2. **Advisory Guidance Anticipation:** That the District's reoccupancy documentation protocol conforms to the historical precedent established by county health departments and LAUSD during the 2025 wildfire recovery, anticipating the nonregulatory guidance due July 1, 2028.
3. **Clearance File Authority:** That the attached School Smoke Reoccupancy File Pack constitutes the complete, minuted clearance file for the reoccupancy of _____ Campus following the _____ Wildfire.

MINUTE ATTESTATION & BOARD / COUNCIL RECORD

Meeting Date Minuted:		**Minute Record #:**	
Board President / Clerk:		**Signature:**	
Superintendent / Ops Lead:		**Signature:**	