PETERSON
CONSULTING, INC.

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Questions and Answers regarding PCBs at BHS and BTC

Q: What triggered the discovery of PCBs?

A: PCBs were discovered during planned testing associated with the BHS / BTC renovation project. Prior to any renovation or new construction building owners are required to assess existing building materials to determine if hazardous substances are present. Testing for asbestos containing material (ACM) is what most people are familiar with, but we also look to see if other hazardous materials, such as lead or PCBs are present. Identifying and locating these materials is an essential step in the design process in order to protect the health of all building occupants before, during, and after construction, and to ensure that the waste is properly handled and disposed of in a qualified receiving site.

Q: When did testing begin?

A: Testing began in June 2019 as part of due diligence related to project planning and design. Early tests indicated the presence of PCBs and that initial finding was reported in a public meeting on July 18, 2019. These early findings triggered a series of subsequent tests whose goal was to map out the scope of the contamination. This testing focused mainly on caulking and glazing compounds as those were the components most likely to contain PCBs and most likely to be disturbed during renovation and construction.

Q: Once these materials were discovered why couldn't they just be removed right away?

A: PCBs were found in caulking that is part of larger assemblies of construction such as window and door systems and wall systems and in some areas the PCBs are present in adjacent materials, including masonry. This means that in order to remove and dispose of contaminated materials legally, large portions of the structure will have to be removed. The removal and disposal plan has to be carefully coordinated with the build-back plan and this of course is tied to the design, budget, and schedule of the BHS/BTC plan. And just as importantly, the removal and disposal plan has to be reviewed and approved by regulatory agencies.

Q. How and why was the subsequent testing carried out?

A: After receiving the initial results of testing for PCBs in building materials, the project team felt that there were gaps and anomalies in the data that needed to be reviewed. In April of 2020 the District hired Fuss & O'Neill (F&O) as a consultant to provide peer review of the testing protocols being proposed and executed by ATC, our primary environmental consultant. F&O was selected because of their extensive experience working with PCBs in schools in EPA Region 1. Though they were hired in April, the Coronavirus epidemic slowed the ability of F&O to come to Vermont and complete their work. F&O did ultimately identify opportunities to improve the testing process and their recommendations led to soil sampling that started on June 17, 2020. A final report was prepared by ATC which incorporated all of the sampling and testing. This report was submitted to VT DEC, DOH, and EPA for their review on August 18, 2020.

Q. Why wasn't the air tested sooner?

A. The sampling and testing protocols were appropriately driven by the planned renovation and construction. In order to plan and design a project that is compliant with laws regulating the safe removal and disposal of hazardous materials, bulk sampling throughout the facility had to happen first. The need for air quality testing became clear once we determined that F building would likely no longer be a part of the larger renovation plan and that the bulk samples from F building contained the highest levels of PCBs on the campus. It was also determined the air quality testing should be conducted in the rest of the buildings on campus mostly driven by the fact this he project has a 3 year build-out schedule. Regulatory agencies cautioned us not to conduct air testing until they reviewed the sampling and testing data and reviewed and commented on the air testing work plan.

Q. When was air quality testing Ordered?

A: At a meeting with the regulatory agencies on August 20, 2020 to review the sampling and testing report, the agencies cautioned us not to conduct air testing until they had a chance to review and comment on the air testing plan. Following that review air testing was commenced on September 1, 2020.

Q: When were the results of this air quality testing received?

A: Results for F building were received on September 9 and showed that some areas of F building far exceeded EPA Standards. With this information, the

Superintendent decided on September 9, 2020 to cancel school for 9/10and 9/11 and to go fully remote for the week of 9/14 – 9/18. Test results for buildings A-E are starting to arrive as of today (September 11, 2020) and we expect all results from this round of air testing to be in-hand by September 15.

Q: What are the next steps?

A: The immediate next steps are to immediately assess and mitigate any potential hazards. This assessment will include some degree of risk analysis in addition to taking measures to reduce exposure. This assessment and resulting plan will be developed through close collaboration between our environmental consultants, the regulatory agencies, and the project team. It is too early to say exactly what these measures will be, but it could include additional testing and identification of sources, spot removal of some sources, targeted and specialized cleaning, encapsulation, HVAC adjustments, etc.

Q: What are some of the implications for the BHS / BTC project?

A: As you know, the board voted in April 2020 to defer work on F building in order to help close the budget gap for the project. This meant that at some point in the future F building would need to become a separate project with new funding. The timeline for this was indefinite at the time of that vote, but under these circumstances the District is likely to be under increased pressure to accelerate that timeline and address F building sooner rather than later. If project bond money has to be used for F building then there will need to be extensive cuts to the rest of the project. That will make it difficult, if not impossible, to meet the stated project objectives and requirements.

Q: Where can we learn more about the risks associated with PCBs and who can I contact with questions?

A: For questions or more information about PCBs and health effects, please contact our partners at the Vermont Department of Health:

Sarah Vose, State Toxicologist
Vermont Department of Health
108 Cherry Street, Burlington VT
1-802-863-7598
Sarah.vose@vermont.gov

Our partners at the State (both Department of Environmental Conservation and Department of Health) have a provided a fact sheet to our community with more information, including numbers to a call.
https://www.healthvermont.gov/sites/default/files/documents/pdf/ENV_PR_PCBs-fact-sheet-english.pdf

Q: Can you provide links to other resources?

A: Yes. Here are some additional links and resources that we think will be helpful:

https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs

https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials#Information-Buildings

https://www.healthvermont.gov/sites/default/files/documents/pdf/ENV_PR_PCBsSchools.pdf

Preview attachment caulkschoolkit.pdf

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