

DEPARTMENT OF ENVIRONMENTAL CONSERVATION AGENCY OF EDUCATION DEPARTMENT OF HEALTH

To: Tom Flanagan Email: tflanagan@bsdvt.org Cc: Jessica Leclair, Isabel Ruiz, Joseph Resteghini, Dean Williams, Lyall Smith, Matthew Rigdon, Jill BriggsCampbell, Interim Secretary Heather Bouchey, Department of Health, Department of Environmental Conservation Email: jessica.laclair@vermont.gov, Isabel.Ruiz@vermont.gov, jrestegh@bsdvt.org, dawillia@bsdvt.org; lsmith@bsdvt.org; Rigdon.Matthew@epa.gov; Jill.BriggsCampbell@vermont.gov; Heather.Bouchey@vermont.gov; AHS.VDHPCBSchoolSampling@vermont.gov; SOV.PCBSampling@vermont.gov; RE: Champlain Elementary School – PCB Results Date: December 21, 2023 Name of school: Champlain Elementary School Address: 800 Pine Street School ID: PS065 Site number: 20225147

**PCBs have been detected in the indoor air of your school.** In this letter, you will find the results along with some temporary occupancy options to reduce exposure to students and staff while you work with the State and a consultant to address the PCBs.

We recognize there is a lot of information in this letter. Staff from the Vermont Department of Health (Health), Department of Environmental Conservation (DEC), and Agency of Education (AOE) would like to meet with you to discuss the results and temporary occupancy options for your school. Please let us know as soon as possible which day(s) and time(s) work for you by emailing your DEC project manager, Shawn Donovan, at Shawn.Donovan@vermont.gov, and SOV.PCBSampling@vermont.gov.

The results will be <u>posted online</u> 10 business days from today, allowing time for you to review these results and select your temporary occupancy plan.

# What was found?

**The PCB level in at least one tested room was at or above the Vermont School Action Level for your school.** The lowest grade in your school is Pre-Kindergarten. Therefore, 30 ng/m<sup>3</sup> is the Vermont School Action Level for your school. The Vermont School Action Levels are:

- 30 ng/m<sup>3</sup> (nanograms per cubic meter) for pre-kindergarten
- 60 ng/m<sup>3</sup> for kindergarten through 6<sup>th</sup> grade
- 100 ng/m<sup>3</sup> for 7<sup>th</sup> grade through adult

The result for each room is listed in a table later in this letter, and your next steps are listed below.

# Why are the levels different for each age group?

Food is the main non-school source of exposure to PCBs for most people. Younger children are exposed to more PCBs per their body weight from the food they eat. The school action levels take into account the total exposure to PCBs for students and staff from the food they eat. That is why the school action level is lower for younger children and higher for older children and adults.

#### What about the rooms that were not tested?

Before testing, the consultant evaluated the school building for potential PCB sources and assigned rooms to groups based on the presence of similar building materials, construction and/or renovation dates. About one third of rooms in each group were tested. Rooms that were not tested are assumed to have similar PCB levels as the tested rooms in that same group. All rooms – tested and not tested – are listed in the table below. In general, rooms will not be tested again for PCBs in indoor air until the PCB sources have been addressed.

## What happens next?

While you work with the State and a consultant to **address the PCBs in the spaces bolded in the tables below**, you will need to adjust how certain rooms are used throughout your school. These are called temporary occupancy options. These temporary occupancy options were designed to help you balance keeping students in school while maintaining a healthy learning environment. All of the options were developed by and are supported by the Health Department. Once you implement a temporary occupancy option, student and staff exposure to PCBs will be reduced.

#### What you need to do now

Within 10 business days of receiving this letter:

- Choose an occupancy option. If none of the two options listed below will work for your school, please email <u>SOV.PCBSampling@vermont.gov</u> to propose other occupancy options.
- 2. Email both <u>SOV.PCBSampling@vermont.gov</u> and your DEC project manager, Shawn Donovan, at <u>Shawn.Donovan@vermont.gov</u>, to let them know which option you chose.
- 3. Share the results and temporary occupancy plan with your community. (A <u>template</u> <u>letter</u> is available at <u>dec.vermont.gov/pcb-schools</u>).
- 4. Implement your temporary occupancy plan.

Please know that staff from Health and DEC are available to attend meetings and take calls from parents, caregivers, and staff to support and help explain the option you chose and to answer any questions from your community.

### What are the temporary occupancy options?

Typically, three temporary occupancy options are provided – lowest risk, lower risk, and higher risk. For your school, the higher risk occupancy option does not apply, so you only have two temporary occupancy options to choose from. The temporary occupancy options were developed by the Health Department and are sufficient to protect the health of your students and staff. Once you implement a temporary occupancy option, student and staff exposure to PCBs will be reduced. Since you know your school best, two options are given so you can choose what works best to operate your school with as little disruption as possible.

The table below shows the group and result for each primary occupied room (such as classrooms, offices, cafeterias, gymnasiums, etc.) as well as a comparison of the two temporary occupancy options by room and grade level. "Not detected" means that the laboratory did not detect any PCBs.

- Under option 1, you will need to address the PCB sources within one year.
- Under option 2, you will need to **begin mitigation of PCB sources within six weeks**. The first step to begin mitigation is to hire a consultant, so you will need to <u>hire a consultant</u> within six weeks of choosing your occupancy option.

We recommend that you choose option 1 if it is feasible to operate your school. Option 1 achieves the lowest risk of PCB exposure to your students and staff. If you cannot operate your school under option 1, then Health, DEC, and AOE support option 2 as sufficient to protect the health of your students and staff since you will begin mitigation of PCB sources within six weeks. (Connect with your DEC site manager after you choose your occupancy option to learn more about possible mitigation steps.)

You can see which rooms to "use" or to "not use" as primary occupied rooms for each option. For the two temporary occupancy options, you can use all rooms that say "use" for that option before mitigation begins. You will also see the there is no limit on the cumulative number of hours per week for each grade level in the header row. This means the total number of hours per week students can be in the school does not need to be reduced.

# Results for Primary Occupied Rooms and Temporary Occupancy Options for Your School

Room	Group	Result (1 <sup>st</sup> round) (ng/m <sup>3</sup> )	Option 1 No limit PreK	Option 1 No limit K-6	Option 1 No limit 7-Adult	Option 2 No limit PreK	Option 2 No limit K-6	Option 2 No limit 7-Adult
Girl's Locker Room	4	30	Not use	Use	Use	Use	Use	Use
Boy's Locker Room	4	Not Tested	Use	Use	Use	Use	Use	Use
Gym	6	48	Not use	Use	Use	Use	Use	Use
125-Kitchen	8	29	Use	Use	Use	Use	Use	Use
Gym Vestibule	9	9	Use	Use	Use	Use	Use	Use
123-Food Service Room	10	14	Use	Use	Use	Use	Use	Use
Classroom 108	14	Not detected	Use	Use	Use	Use	Use	Use
Classroom 206	14	8	Use	Use	Use	Use	Use	Use
106-Nurse	14	6	Use	Use	Use	Use	Use	Use
Room 225A	14	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 202	14	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 109	14	Not Tested	Use	Use	Use	Use	Use	Use
Teacher Work Room	14	Not Tested	Use	Use	Use	Use	Use	Use
Room 205	14	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 225	15	38	Not use	Use	Use	Use	Use	Use
111-Art	17	15	Use	Use	Use	Use	Use	Use
Classroom 221	17	16	Use	Use	Use	Use	Use	Use
Classroom 216	17	25	Use	Use	Use	Use	Use	Use
Classroom 113	17	26	Use	Use	Use	Use	Use	Use

Room	Group	Result (1 <sup>st</sup> round) (ng/m <sup>3</sup> )	Option 1 No limit PreK	Option 1 No limit K-6	Option 1 No limit 7-Adult	Option 2 No limit PreK	Option 2 No limit K-6	Option 2 No limit 7-Adult
Classroom 217	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 224	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 119	17	Not Tested	Use	Use	Use	Use	Use	Use
Room 107	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 220	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 122	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 217A	17	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 116	17	Not Tested	Use	Use	Use	Use	Use	Use
Room 126	18	25	Use	Use	Use	Use	Use	Use
201-Copier Room	18	22	Use	Use	Use	Use	Use	Use
106B- Student Services	18	4	Use	Use	Use	Use	Use	Use
Room 129A	18	Not Tested	Use	Use	Use	Use	Use	Use
Room 106D	18	Not Tested	Use	Use	Use	Use	Use	Use
Classroom 114	18	Not Tested	Use	Use	Use	Use	Use	Use
Room 211/212	22	13	Use	Use	Use	Use	Use	Use
Room 115	26	32	Not use	Use	Use	Use	Use	Use
101-Main Office	29	Not detected	Use	Use	Use	Use	Use	Use
Room 130	29	Not Tested	Use	Use	Use	Use	Use	Use
Room 132A	29	Not Tested	Use	Use	Use	Use	Use	Use
Room 132B	29	Not Tested	Use	Use	Use	Use	Use	Use

Room	Group	Result (1 <sup>st</sup> round) (ng/m <sup>3</sup> )	Option 1 No limit PreK	Option 1 No limit K-6	Option 1 No limit 7-Adult	Option 2 No limit PreK	Option 2 No limit K-6	Option 2 No limit 7-Adult
Room 106F	30	3	Use	Use	Use	Use	Use	Use
Room 106E	30	Not Tested	Use	Use	Use	Use	Use	Use
Room 106B	30	Not Tested	Use	Use	Use	Use	Use	Use

Here is how we determine which rooms to use and not use:

- **Option 1**: Use all tested rooms less than the school action level. Use untested rooms in a group with to or less than 50% of rooms at or above the school action level.
- **Options 2 and 3**: Use all tested rooms and untested rooms.

#### **Results for Ancillary Spaces**

The results for ancillary spaces are in the table below. These spaces are not occupied all day by staff or students and were sampled to help identify potential PCB sources. "Not detected" means that the laboratory did not detect any PCBs.

If an ancillary space is at or above the school action level, you may reduce the occupancy as is practical.

Ancillary Space	Group	Result (ng/m <sup>3</sup> )
Basement Hall	1	10
B4-Storage	2	30
Boiler Room	3	44
Storage	3	Not Tested
Basement Stairwell	5	30
133-Custodian	7	27
104-Main Electrical Room	11	30
Roof Access	11	Not Tested
Lobby	12	6
Lobby Vestibule	13	7
225-Closet	16	24
2nd Floor Hall (216 side)	18	11
111/116 Storage	18	Not Tested
2nd Floor Hall (225 side)	18	Not Tested
Lobby Hall	18	Not Tested
220/221 Storage	18	Not Tested
122-Closet	19	12
216 Closet	19	Not Tested
119 Closet	19	Not Tested
119-Bath	20	16
113-Bath	20	10
107-Bath	20	6
223-Bath	20	11
207-Bath	20	13
213-Bath	20	19
117 Bath	20	Not Tested
116 Bath	20	Not Tested

Ancillary Space	Group	Result (ng/m <sup>3</sup> )
209 Bath	20	Not Tested
109 Bath	20	Not Tested
222 Bath	20	Not Tested
122 Bath	20	Not Tested
214 Bath	20	Not Tested
111 Bath (111A)	20	Not Tested
118 Bath	20	Not Tested
208 Bath	20	Not Tested
108 Bath	20	Not Tested
215 Custodian	21	10
103-Storage	21	Not Tested
120-Electrical	23	23
210 Electrical	23	Not Tested
Stairwell (225 side)	24	20
Yellow Stairwell	25	13
Green Stairwell	25	Not Tested
Red Stairwell	25	Not Tested
Downstairs Hallway	27	25
132A-Bath	28	10
127B-Bath	28	8
126 Bath	28	Not Tested
127A Bath	28	Not Tested
132-Hall	29	17
Room 131C	29	Not Tested
106-Bath	31	4

## How do we take action on the PCB source(s) in our school?

In a couple of weeks, you will receive another letter from DEC. This letter will describe the next steps to take action on addressing the PCBs in your school as well as information on funding options.

# **Questions?**

Staff from DEC, Health, and AOE are available to meet at any point in this process to support you.

- For testing and test results questions, email your DEC project manager, Shawn Donovan, at <u>Shawn.Donovan@vermont.gov</u>, and <u>SOV.PCBSampling@vermont.gov</u>.
- For health-related questions email <u>AHS.VDHPCBSchoolSampling@vermont.gov</u>.
- For questions about **funding this work**, email <u>Jill.BriggsCampbell@vermont.gov</u>.