



A Comprehensive Plan for Materials That May Contain PCBs At Burncoat High School and Doherty Memorial High School

- Cleaning
- Remediation
- Testing
- Removal
- Staff and Parent Involvement

INTRODUCTION

The School Committee and the administration of the Worcester Public Schools takes the health of its students and staff very seriously. It is of primary importance that we provide everyone with an environment that is safe.

Over the past several years, the issue of the possible existence of PCBs at various schools has become a concern to staff and parents. It has also been a high priority issue for the School Committee. We recognize the concerns raised about PCBs and we have worked hard to remove materials that may contain PCBs from our schools. Where removal was not immediately possible, we have embarked on a program to encapsulate the materials.

To date, the Worcester Public Schools has spent approximately \$54 million dealing with the PCB issue. Included in this work we have:

- Removed all lighting ballasts containing PCBs material at 15 schools for a total cost of \$300,000
- Replaced windows at 15 schools for a total cost of \$40.3 million.
- Anticipate replacing windows at 4 schools in 2017 for an estimated cost of \$12 million.
- Submitted Statement of Interest request for window replacement projects to the Massachusetts School Building Authority for 2018 at 3 schools.
- Remaining schools being submitted to the MSBA pipeline for renovation or replacement.

Work remains to be done at both Burncoat and Doherty High Schools. We are committed to a program that will keep everyone who works, studies or enters these buildings safe.

This comprehensive plan is an effort to respond to community concerns and to keep parents and staff fully informed relative to our efforts. We will present it to the school communities and solicit their input. Going forward, we will adjust the plan as needed, and present regular updates to the school community.

CLEANING

Until we are able to replace both schools through the Massachusetts School Building Authority program, it is important that we continue a regular and vigorous program of school cleanings to include all classrooms, offices and common areas. Among other things, we are committed to the following:

1. Training of all custodians

Most of the regular cleaning to take place in these buildings will be performed by WPS custodians. To ensure their safety and that cleaning is done properly, the WPS will conduct complete training for all relevant staff. This training will include but is not limited to (a) what protective clothing is worn while cleaning (b) what surfaces to clean and (c) how to clean to ensure maximum results and to minimize airborne dust in the schools.

Said training will be conducted at least annually.

2. A regular schedule of classroom, office and common area cleaning

As recommended by our consultants and in accordance with EPA best management practices, we will clean all classrooms, offices and common areas on a regular basis. This targeted cleaning is intended to prevent the accumulation of dust that may contain PCBs.

See Appendix A for schedule.

3. A regular schedule of ventilation cleaning

Again, as recommended by our consultants, we will evaluate and clean all ventilation systems and components on a regular basis. This targeted cleaning is intended to prevent the accumulation of dust that may contain PCBs.

See Appendix B for schedule.

4. Teacher and staff assistance in monitoring full compliance

As hard as we try, from time to time, it is likely that there will be areas that we do not clean or do not clean fully. When that happens, it is our desire to correct the problem as soon as we can. To do that, we will ask for staff help.

If a teacher or other staff member sees a classroom, office or common area that is not cleaned or not cleaned fully according to the published schedule, we would ask them to notify us by using a simple form which we have provided and which will also be available in the school's principal's office. A copy of every notice turned in by a staff member will be sent to the Superintendent for monitoring. When the work is completed, the form will be signed by the appropriate WPS administrator with copies going to the principal as well as the Superintendent.

It is important to point out that the participation of staff, in this endeavor is voluntary. However, it is our hope that they will help us keep these buildings safe for both staff and students by monitoring our work.

See Appendix C for form.

AIR TESTING

The issue of bulk testing materials around the windows has been the subject of some controversy. We believe that it is important that we test to ensure that the environment for students and staff is safe and to monitor the effects of our cleaning and remediation program. To that end, we will:

1. Annual air quality testing

Regularly, at least annually, conduct air quality tests throughout both Burncoat and Doherty High Schools. The results of these tests and recommended action steps will be included into this comprehensive plan and presented to the school communities for their information. Testing results will also be forwarded to the PCB Coordinator of Region 1 of the EPA.

2. Working with the Educational Association of Worcester

The Educational Association of Worcester will be allowed to observe all air testing, conduct their own parallel testing at their own expense (in the same manner and locations as WPS air tests), and offer input on recommendation remediation efforts.

The District will also meet monthly with the designated EAW representatives and/or the Health and Safety Committee at each school until remediation efforts are completed. The District will also provide advanced notice to the EAW of any planned work in the schools which could disturb materials that may contain PCBs.

REMEDIATION

Given the age of these buildings, It is possible that existing window caulking contains PCBs. Until the windows and the suspected caulking is removed, preferably through new school construction, it is important that existing caulking be encapsulated to eliminate dust particles from floating into the air.

To minimize the migration of dust, the WPS has conducted a review of all caulking and an encapsulation of said materials. However, even complete encapsulation must be monitored to ensure its integrity. To that end, we will:

1. Quarterly examination of caulking by specialists

Hire outside environmental consultant to conduct a complete review of all caulking to ensure the integrity of the existing encapsulation. Areas in need of additional encapsulation will be noted and encapsulated as soon as possible.

2. Teacher and staff assistance in monitoring full compliance

As stated above (Cleaning), we will ask teachers and staff to assist us in monitoring the encapsulation. If a teacher or other staff member notices an area of caulking where the integrity of the encapsulation is in question, we would ask that they provide that information to us so that we might respond promptly.

With the voluntary help of our staff, we can ensure that all caulking remains completely intact and encapsulated.

See Appendix C for form.

REMOVAL AND REPLACEMENT

Doherty Memorial High School was submitted every year for consideration by the MSBA since 2012. It was accepted into the MSBA pipeline for renovation or replacement in January of 2017. This means that we will likely have a new DMHS within the next five to six years. Likewise Burncoat High School was submitted for consideration this year and will continue to be a priority for replacement by the district.

STAFF AND PARENT INVOLVEMENT

Gaining and maintaining the trust of staff and parents is vitally important to us. It is important that everyone know what we are doing, when we are doing it and what we plan to do in the near future. To that end, we have created this plan.

In addition to this document and the work detailed, it would be our intention to:

1. Present plan to staff and parents for comment

We want everyone to be fully informed. It is our intention to present this plan to staff and parents at each school, explain what we intend to do, answer any questions and to solicit any advice that someone might have to offer.

If suggestions are made that we consider reasonable and helpful to ensuring the safety of students and staff, those would be incorporated into our plan.

2. Annual update

At least once a year, within the first semester of the year, we would present any updates to our plan to staff and parents. The presentation to staff will be conducted during a regularly scheduled after-school staff meeting. At that meeting, along with an update, questions will be answered and we will solicit suggestions from those in attendance.

3. Teacher and staff monitoring of cleaning and caulking encapsulation to ensure compliance

As stated within this document, we will be asking for the voluntary participation of all staff to ensure that our cleaning and remediation work is proceeding as planned.

4. Posting plan on WPS web site

To ensure that anyone interested has access to this information and any updates, we will post this plan on the WPS web site. All information about district efforts to manage PCBs can be found at: <http://worcesterschools.org/environmental-management/pcbs>

Appendix A

Burncoat High School

Two Week Rotating Cleaning Schedule:

Week 1

Monday- A-wing.
Tuesday- B-wing/café
& Kitchen.
Wednesday- C-wing.
Thursday- Upper D-wing &
D- Cafe
Friday- Upper E-wing.

Week 2

Monday- Lower D-wing.
Tuesday- F-wing &
Automotive
Wednesday- G-wing/gym &
ROTC
Thursday- Upper/lower
Boiler room
Friday- H-wing
* Attached to the
middle school.

Doherty Memorial High School

Two Week Rotating Cleaning Schedule:

Week 1

Monday - ½ of 100 series wing
Tuesday - ½ of 100 series wing
Wednesday - ½ of 400 series wing
Thursday - ½ of 400 series wing
Friday - Gymnasium and auditorium

Week Two

Monday - ½ 200 series wing
Tuesday - ½ 200 series wing
Wednesday - ½ of 300 series wing
Thursday - ½ of 300 series wing
Friday - Upper Auditorium and Science/Art
wing

***These cleaning schedules are subject to change, pending the results of testing.**

The tasks associated with the cleaning are as follows:

Classrooms/Offices:

1. Vacuum all window sills with a HEPA vacuum.
2. Wipe down all windows and sills with a neutral cleaner.
3. Wash all walls with a neutral cleaner.
4. Vacuum all drop ceiling tiles and tracks with a HEPA vacuum.
5. Wipe down all furniture with neutral cleaner.
6. Wash (wet mop) all floors with neutral cleaner.

Corridors:

1. Wipe down all windows and sills with a neutral cleaner.
2. Wipe down all tops of all lockers with a neutral cleaner.
3. Wash all walls with a neutral cleaner.
4. Wash (wet mop) all floors with a neutral cleaner.

Cafeteria:

1. Wash all walls with a neutral cleaner
2. Wipe down all furniture with a neutral cleaner
3. Wash (wet mop) all floors with a neutral cleaner.

Appendix B

HVAC Maintenance Schedule for Burncoat High School:

Completed Work

January 9 -20, 2017

- Routine maintenance on air handler units and building equipment, including belts, grease, exhausts and filters. Also cleaned screens and debris from fan rooms.
- Tested and commissioned all air handler units for functionality. Created deficiency list based on findings.

January 26-February 10, 2017

- Starting HEPA vacuum cleaning of supply and return grates in classrooms.
- Controls contractors made repairs to various units . Repairs consisted of replacing faulty actuators controlling return, exhaust, and outside air dampers. Also lubricated damper shafts and tested programming of controls.

February 13 – 17, 2017

- Performed a complete air balance in school. Adjusted airflow to all classrooms using VFD drives. Dialed in fresh air intake and exhaust air exchange.
- WPS technicians completed additional findings from deficiency list. Including repairs to ductwork and motors.

February 27 – March 3, 2017

- Started installation of foam filter material in all supply grates.

Summary:

The district checks on status of grate filters weekly. Also, the district frequently checks air handler filters, belts, and dampers to ensure proper function and cleanliness.

HVAC Maintenance Schedule for Doherty Memorial High Schools:

Completed Work

March 13-17, 2017

- Routine maintenance on all major equipment, including filters, belts, grease and exhausts completed during this period.
- Classroom univent filters replaced.

March 20-April 4, 2017

- Contractors performed cleaning and maintenance on all energy recovery units wheels.
- Cleaning of all classroom univents and supply/return grills with HEPA vacuum begins.

The heat distribution has also been balanced and corrected to prohibit overheating. The supply vents in Auditorium will be cleaned from lift during April vacation shutdown.

Appendix C - Anonymous Complaint Form

This anonymous complaint form is meant to allow teachers and staff to submit their concerns with a room or area being insufficiently cleaned, without fear of neither repercussion nor retaliation.

This form will be on available at the principals' offices. All complaints will be reviewed by the EAW, the Superintendent, and School Committee.

Date: _____

School: _____

Room or Area: _____

Explain the nature of your concern:
