



June 25, 2018
File No. 5171-06-01

Mr. James Bedard, Director of Environmental Management and Capital Projects
Worcester Public Schools
20 Irving Street
Worcester, MA 01609, MA 02035

RE: May 2018 PCB BMP Quarterly Status Report
Burncoat High School

Dear Mr. Bedard,

In accordance with the Worcester Public School's (WPS) request, O'Reilly Talbot & Okun Associates, Inc. (OTO) is pleased to present this quarterly independent status report of the Best Management Practices (BMPs) implemented at the Burncoat Memorial High School (Burncoat). The objective of the BMP program is to reduce potential exposures to polychlorinated biphenyls (PCBs) that may be present in building materials within the school. WPS and its staff are responsible for implementing the BMPs, and OTO conducts quarterly evaluations to provide WPS management with an independent assessment of their implementation.

As you know, certain building materials used in the construction and renovation of school buildings during the period between 1950 and 1980 may contain PCBs. The US Environmental Protection Agency (USEPA) has recommended that a BMP program be implemented in schools either built or renovated during this period. Burncoat was constructed during this period.

Note that WPS also requested OTO to conduct indoor air monitoring for PCBs at Burncoat and that the second round of sampling was completed in February 2018. The results of air testing have been provided in separate reports, although we note that all results were well below USEPA guidelines.

Best Management Practices

In its July 28, 2015 guidance for school administrators and other building owners and managers titled "Practical Actions for Reducing Exposure to PCBs in Schools and Other Buildings," the USEPA describes potentially useful BMPs, including:

1. Ensuring that ventilation systems are operating properly and are regularly inspected and maintained according to system manufacturer instructions and guidelines or ANSI/ASHRAE/ACCA Standard 180-2012—Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems. If system cleaning is needed, follow ANSI/ACCA Standard 6—Restoring the Cleanliness of HVAC Systems (2007);
2. Cleaning inside schools and other buildings frequently to reduce dust and residue;
3. Using a wet or damp cloth or mop to clean surfaces;

4. Using vacuum cleaners with high efficiency particulate air (HEPA) filters;
5. Not sweeping with dry brooms or using dry cloths for dusting;
6. Washing hands with soap and water, particularly before eating; and
7. Washing children's toys.

OTO's assessment of BMP effectiveness focuses on items 1 through 5 on this list. For items 6 all school lavatories are equipped with soap and water. Item 7 is not relevant to a high school environment.

Assessment of BMPs at Burncoat High School

We conducted our BMP assessment at Burncoat on Thursday, May 24, 2018. We reviewed the operation of the HVAC/air handling equipment with school engineering staff. The system underwent a significant overhaul approximately one year ago and was operating properly at the time of the BMP assessment.

OTO observed 50 rooms selected at random during the assessment at Burncoat, or roughly 50% of rooms within the school. Our observations of these rooms focused on the presence of dust on windows, window sills, and window frames as well as on the condition of the Univent systems that provide heating and ventilation. The rooms we observed included:

- The cafeteria;
- Kitchen;
- Library,
- Faculty break rooms;
- Administrative offices;
- Selected classrooms, and
- Hallway areas.

Our general observations are summarized on Table 1 (attached); representative photographs are also attached. We discussed cleaning procedures with school staff emphasizing the importance of consistency with the BMPs. We were assured by staff that the BMP recommendations were routinely followed in the school.

Based on our discussions and observations, the implementation of the BMPs at Burncoat is very effective. The vents to the HVAC plenum that serves most of the building were free of significant dust and debris. The observed windowsills and blinds exhibited little dust. The storage of educational materials on windowsills and air vents, which was observed in previous visits, has been curtailed.

Other USEPA Recommendation for Suspected PCBs in Schools

Although not technically BMPs, USEPA made three other recommendations in its July 28, 2015 guidance for PCBs in schools:

- Remove all PCB containing fluorescent light ballasts (FLBs);

- Give consideration to encapsulating suspected PCB containing materials (such as caulk) to further reduce the potential for PCB exposure; and
- Removing suspect PCB containing building materials during planned renovations and repairs.

As you know, WPS removed all suspect PCB containing FLBs in 2012. There are no suspected PCB FLBs remaining in the school system.

Also in 2012, WPS encapsulated the suspect PCB containing caulk around all of the windows at Burncoat with an additional thick layer of non-PCB caulk. We observed this over-caulking in each room we visited and found that it was intact and in good condition. This over-caulking is repaired on an as-needed basis to maintain its condition.

Exterior suspect caulking was likewise covered with new caulk to a height of eight feet above grade. No significant deterioration of the uncovered caulking at the tops of window units was observed.

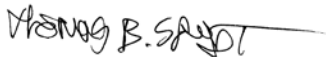
Finally, it should be mentioned that WPS is in the process of applying for to the state sponsored financing program that will help with the replacement of the school in approximately seven years. When Burncoat is replaced, the suspect PCB containing materials will be removed and disposed of in accordance with USEPA requirements.

Conclusions and Recommendations


In conclusion, it is our opinion that the BMPs are being implemented in an effective manner. We recommend that the next quarterly on-site visit be conducted in August 2018.

Should you have questions or require additional information, please contact the undersigned.

Very truly yours,
O'Reilly, Talbot & Okun Associates, Inc.



Thomas B. Speight, CHMM
Project Manager



James D. Okun, LSP
Principal

Attachments

Table 1 – Summary of Observations for Burncoat High School
Selected Photographs from Burncoat High School