



Worcester Public Schools



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Statement Regarding Testing of PCBs in Schools In Response to Press Release from the Educational Association of Worcester

September 13, 2016

In 2010, the Educational Association of Worcester (EAW) requested permission to conduct testing in our schools to identify whether PCBs might be present in certain building materials, particularly in window caulk. The initials “PCBs” stand for polychlorinated biphenyls, a chemical that was widely used throughout the United States between 1950 and 1978 to make building materials last longer and to make them more fire resistant.

In the late 1960s, scientists discovered that PCBs were being found in a wide range of environmental settings far from the locations where they might have been used. As a result of this finding the use of PCBs in building materials started to decline in the early 1970s and had completely stopped by the end of that decade. In 1978 the US Environmental Protection Agency (EPA) issued regulations to ban the manufacturing and use of PCBs.

However, by that time many buildings in the United States including many schools across the country had been constructed using building materials that contained PCBs. The EPA has issued Best Management Practices (BMP) guidelines to schools that advises them on how to manage building materials that may contain PCBs. The Worcester Public School Department adopted EPA’s BMP guidelines in 2011.

EPA advocates these steps as the key parts of its BMPs:

- Removing florescent light ballasts that may contain PCBs;
- Changing light fixtures that may have been in contact with PCBs from a failed florescent light ballast; and
- Carefully collecting dust and debris that may be given off by materials that are suspected of containing PCBs.

It is important to be aware that EPA recommends not testing suspect materials as part of their BMPs.

The Worcester Public School Department has continued implementing its BMP program to the present day. WPS has already fully removed PCB light ballasts and affected light fixtures. EPA scientists have said that removing PCB ballasts and affected light fixtures is the most important

step in reducing potential indoor PCB exposure. By having already completed this step WPS is well ahead of other large school systems such as New York City.

It is also worth pointing out that EPA and the Massachusetts Department of Public Health agree that PCBs in a school's building materials do not pose a health risk to students or staff provided that the EPA's BMPs are followed.

WPS has retained a PCB consultant to assist the district in fulfilling the BMPs. According to the district's consultant, Jim Okun of O'Reilly, Talbot & Okun (OTO) Associates, PCBs are not highly toxic to people. He agrees with the EPA and Massachusetts Department of Health scientists that PCBs in building materials do not pose a risk to building users.

There is no regulation requiring Worcester Public Schools to test for PCBs or to implement the BMP. As already noted, EPA recommends not testing building materials for PCBs. Despite this the EAW has sought to conduct its own testing and brought an unfair labor practice charge before the Massachusetts Department of Labor Relations. Lengthy litigation ensued with hearings taking place over the course of five days between August 30, 2012 and December 5, 2014. Both the EAW and the District submitted post hearing briefs and a decision of the single hearing officer who presided over the case issued on June 8, 2016.

The Worcester Public Schools has exercised its rights under the law to appeal the decision of a hearing officer of the Department of Labor Relations which issued on June 8, 2016 and which granted the Educational Association of Worcester the right to have an environmental expert conduct exterior testing of window caulking at Doherty High School and Burncoat High School in order to determine whether PCBs exist in such caulking. This appeal will be decided by the Commonwealth Employment Relations Board. At this point, both the District and the EAW have filed written submissions in connection with the appeal and during the processing of the appeal, the order granting access for testing has been stayed.

Summary of WPS's Action to Implement the Best Management Practices

As a starting point, the Worcester Public Schools identified the following 27 schools that were constructed or had major renovations during this twenty-eight-year time period when PCBs were commonly in use in building materials.

<u>Schools Constructed During Timeframe</u>		<u>Schools Renovated</u>
1. Belmont Street	10. McGrath Elementary	1. Columbus Park
2. Burncoat High	11. Mill Swan	2. Greendale
3. Burncoat Middle	12. New Citizens Center	3. Harlow Street
4. Chandler Elementary	13. South High ¹	4. May Street
5. Chandler Magnet	14. Union Hill	5. Nelson Place ³
6. Clark Street	15. Wawecus Rd	6. Rice Square
7. Doherty High	16. West Tatnuck	7. Thorndyke Road
8. Elm Park	17. Worcester Arts	8. Tatnuck Magnet
9. Flagg Street	18. Forest Grove Middle ²	9. Worcester East Middle

¹ South High project is the MSBA feasibility stage for replacement or major renovation

² Forest Grove Middle School had major renovation, including window replacements, in 2001

³ Nelson Place is being replaced by new school under construction in 2017

Having identified the schools constructed or renovated during the time period in question, the district worked collaboratively with the EPA and engaged environmental consulting and remediation services. The district spent approximately \$1.2 million during the summer 2012 for short term methods to address the potential sources of PCBs in the Worcester Public Schools. This work included the following tasks:

- Lighting fixture replacement (removal of all PCB ballasts)
- Fresh air intake optimization & system balancing
- Targeted surface cleaning
- Weatherization of windows.

These are all Best Management Practices that the EPA recommends that schools adopt to reduce potential exposure to PCBs. These best practice steps have been completed and monitored by the district. The most recent monitoring was completed in early 2016 by the districts environmental consultant, OTO Associates.

The district has committed to long term replacement of windows in these buildings to remove any PCBs that may exist in window caulking. The district has successfully submitted Accelerated Repair Projects to the Massachusetts School Building Authority (MSBA) for windows replacement projects at the following schools:

2012 Approved Projects	2014 Approved Projects
Chandler Magnet School	Clark Street School
Lake View School	Goddard School of Science and Technology
May Street School	Union Hill School
New Citizens Center	West Tatnuck Elementary School
2013 Approved Projects	2015 Approved Projects
Columbus Park School:	Flagg Street School
Tatnuck Magnet School	Francis J. McGrath School
Worcester Arts Magnet School	Grafton Street School
2016 Approved Projects	
Belmont Elementary School	Wawecus Elementary School
Chandler Elementary School	

The district has identified (in the FY17 Budget, page 130) the following timeline for submitting additional window replacement projects to the MSBA for funding consideration:

- Elm Park Community School (2018)
- Rice Square School (2018)
- Thorndyke Road School (2018)

The district has submitted Doherty High School, Burncoat High School, and Worcester East Middle School to the MSBA, most recently in 2016, for major renovation or replacement consideration (to include window replacement).

The district takes health and safety in our buildings as its highest facilities priority. The district's environmental management team reviews and addresses all environmental issues that might be found in schools so that the buildings are safe for students, staff, and visitors. The District remains committed to its short term and long term efforts to continue to address the possible presence of PCBs in its schools.

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