



April 18, 2022
J5174-04-03

Worcester Public Schools
20 Irving Street
Worcester, MA 01609, MA 02035

Attn.: Ms. Kristen Tran,
Environmental Health & Safety Coordinator

RE: PCB BMP Quarterly Status Report, 2021-2022 School Year
Third Quarter, February, 2022
Burncoat High School

Dear Kristen,

In accordance with the Worcester Public School's (WPS) authorization, O'Reilly Talbot & Okun Associates, Inc. (OTO) is pleased to present this quarterly status report of the Best Management Practices (BMPs) implemented at the Burncoat High School (Burncoat). This status report represents the third quarter of the 2021-2022 school year. The objective of the BMP program is to reduce potential exposure to polychlorinated biphenyls (PCBs).

Certain materials used in the construction and renovation of buildings between 1950 and 1980 may contain PCBs. Burncoat High School was constructed during this period. The US Environmental Protection Agency (USEPA) has recommended that a BMP program be implemented in schools and other buildings either constructed or renovated during this period.

WPS and its staff are responsible for implementing the BMPs at Burncoat High School. OTO personnel are responsible for conducting quarterly independent evaluations to provide WPS management with an assessment of the effectiveness of the BMPs implementation.

Best Management Practices (BMPs)

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 described 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 cloth wipes for dusting;
6. Washing hands with soap and water, particularly before eating; and
7. Washing children's toys.

We understand that WPS has modeled its BMP program for Burncoat High School on EPA's guidelines. OTO's assessment of BMP effectiveness focuses on items 1 through 5 on this list. Regarding item 6, all school lavatories are equipped with soap and water, and it is the responsibility of students and staff to maintain personal cleanliness. Item 7 on the list is not relevant to high school environments.

Assessment of BMPs at Burncoat High School

We conducted the third quarter, 2021-2022 school year BMP assessment at Burncoat on February 24, 2022, accompanied by representatives from the District and School environmental and facilities department. The Heating, Ventilation, and Air-Conditioning (HVAC) system was operating properly at the time of the BMP assessment.

Because window and door caulking in the School may contain PCBs, WPS has previously applied a layer of non-PCB caulk over the previously existing caulking to reduce the potential for exposures. OTO observed twenty-five (25) classrooms or other representative spaces in the school selected at random during the assessment. Our observations focused on the presence of dust on windows, windowsills, and window frames as well as the univent systems that provide heating and ventilation to the classrooms.

The school spaces we observed included:

- Main Office and other offices,
- Teacher Resource Center,
- Cafeteria,
- Media Center/Library,
- Hallways and,
- Other Selected classrooms or learning areas

Our general observations are summarized on Table 1 (attached). During the assessment the majority of rooms/areas observed were rated as "Very Good" (minimal dust or debris)

However, some areas rated as “Little” or “Moderate” dust accumulation. We observed eight areas (A-12, B-1, C-5, E-6, D-10, D-4, JROTC Hallway/stairs, and D-Wing to B-Wing Hallway) with various amounts of deteriorating and missing caulk (from 2-inches up to entire seams). Rooms with deteriorating and missing caulk were identified at the time to District and School facilities representatives and are documented in the attached Table. The univents were generally free of significant dust and visible oil leakage.

Based on our discussions and observations, it is our conclusion that the implementation of the BMPs at Burncoat is generally effective. We recommend that areas observed with missing caulk receive an application of non-PCB caulk sealant, and that areas noted to have moderate dust accumulation be cleaned in accordance with “Practical Actions for Reducing Exposure to PCBs in Schools and Other Buildings” guidance.

Note that WPS has also authorized OTO to conduct annual indoor air monitoring for PCBs at Burncoat. The full air testing reports are provided separately from the BMP reports, although we note that the air monitoring results have been well below USEPA guidelines for PCB concentrations in school air for each of the sampling rounds completed to date.

Other USEPA Recommendations 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.

WPS removed all suspect PCB containing FLBs in 2012. There are no suspected PCB FLBs remaining in the Worcester school system.

In 2012 WPS also encapsulated the suspect PCB containing caulk around the windows and doors at Burncoat with an additional thick layer of non-PCB caulk. Exterior suspect caulking was likewise covered with new caulk to a height of eight feet above grade. WPS subsequently over-caulked the remainder of the building’s exterior door, window, and expansion joints in September and October 2018. This over-caulking is repaired as needed to maintain its condition.

Finally, it is noted that WPS has applied to the state sponsored school building financing program for help with the replacement of the Burncoat High School building. When Burncoat is replaced, the suspect PCB containing materials will be removed and disposed of in accordance with applicable regulatory requirements.

Conclusions and Recommendations

In conclusion, it is our opinion that the BMPs are being implemented in an effective manner at Burncoat High School. We recommend that Facilities personnel visit the areas where sections of and/or entire seams of caulk appeared missing, or where dust accumulation was "Light" or "Moderate" to install caulking and perform cleaning as needed in those areas, respectively. We also recommend that the next quarterly (Quarter 4 of the 2021-2022 School year) on-site visit be conducted June or July of 2022.

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

Sincerely,
O'Reilly, Talbot & Okun Associates, Inc.



Alec Robinson,
Staff Scientist



Christine Arruda, CIEC
Senior Project Manager



Robert Kirchherr, CSP
Principal

Attachments Table 1 – Summary of Observations for Burncoat High School

cc Mr. James Bedard,
Facilities Director

Table 1 - Summary of BMP Observations
 Burncoat High School
 179 Burncoat Street
 Worcester, MA 01602
 February 24, 2022

Room	Condition of Caulk	Condition of Univents	Dust Accumulation	Comments
A-1 Main Office	VG	VG	VG	---
A-12	VG	VG	VG	2nd window from right, bottom pane, left seam, 4" of caulk missing
A-16	VG	VG	VG	2nd window from right, bottom pane blocked by wood, middle pane blocked by plexiglass. 3rd window from right, middle pane, blocked by plexiglass
B-11	VG	VG	VG	---
B-1	VG	VG	VG	3rd window from right, bottom pane, bottom seam, 4" of caulk deteriorating
B-15	VG	VG	VG	---
B-10	VG	VG	M	White board blocking 4th and 5th windows from left
B-14	VG	VG	M	---
Teachers Resource Center	VG	VG	VG	---
B-16 Cafeteria	VG	VG	L	---
C-5	VG	VG	L	6th window from left, bottom pane, all seams missing caulk. 8th window from left, middle pane, all seams missing caulk
C-9	VG	VG	VG	---
C-15 Media Center / Library	VG	VG	VG	---
C-12	VG	VG	VG	---
E-4	VG	VG	L	---
E-6	VG	VG	VG	Bathroom, bottom pane, all seams missing caulk
E-8	VG	VG	L	---
D-10 Offices	VG	VG	VG	1st office on right, far right window, bottom pane, right seam and top seams missing caulk. Middle office locked
D-8	VG	VG	VG	---
D-4	VG	VG	VG	4th window from right, bottom pane, bottom seam, 4" of caulk deteriorating. Right seam, 2" of caulk missing
D-18	VG	VG	VG	Plastic covering 2nd window from right, middle pane and 3rd window from right, middle and bottom pane
Gym Transition Hallway	VG	VG	VG	---
Gym Hallway	VG	VG	VG	Far right window, middle pane blocked by plexiglass
JROTC Hallway & Stairs	VG	VG	M	Hallway; 2nd window from right, blocked by plexiglass. 2nd window from left, middle pane, bottom right half seam missing. Top of stairs window, middle pane, bottom seam, 8" of caulk missing
D-Wing to B-Wing Hallway	VG	VG	M	North side windows; 1st window from left, middle pane, right seam deteriorating. 3rd window from left, bottom pane, top seam missing caulk

CATEGORIZATION

Very good = minimal dust or debris

Little = enough dust to leave a residue on a gloved finger

Moderate = visible accumulations of dust

Significant = thick layer of dust