

September 2021

Indoor Air Testing for PCBs in Vermont Schools – General Overview

To School Administrators:

Polychlorinated Biphenyls (PCBs) are a group of human-made chemicals that were commonly used in building materials and electrical equipment in the past and may still be in use. Caulk, paint, glues, plastics, fluorescent light ballasts, transformers and capacitors are examples of products that may contain PCBs. Schools built or renovated before 1980 may have building materials and electrical equipment that contain PCBs. Act 74, passed in June 2021, requires that all schools in Vermont constructed or renovated prior to 1980 conduct indoor air testing for PCBs on or before July 1, 2024.

What are possible health effects from PCBs?

The potential for health effects from PCBs, as with other chemicals, depends on how much, how often, and how long someone is exposed. PCBs have been shown to have effects on the immune, reproductive, nervous and endocrine (hormone) systems in animal studies. PCBs have also been shown to cause cancer in animals. Studies in humans show that humans could also have these health effects.

Are we required to test for PCBs in the indoor air of our school?

Act 74 was passed which *requires* schools constructed or renovated before 1980 to test indoor air for PCBs. The first step is to collect information on when schools were constructed and renovated to understand how many schools are required to test indoor air for PCBs. Additional guidance on the collection of indoor air samples will be available soon.

What happens if PCBs are found in the indoor air of a school?

The departments of Environmental Conservation (DEC) and Health will review the data. If any PCB result from indoor air testing is above the applicable screening level, DEC and the Health Department will work with you to develop a plan to identify and sample the potential sources of PCBs and to minimize exposure to students and staff. This could include testing, identifying, removing, and mitigating sources of PCBs, and reducing the time spent in some rooms.

If PCBs are found at concentrations above the applicable screening level, sources of PCBs may be present inside the school building. Additionally, the DEC considers the detection of PCBs above the screening value a “release” of hazardous materials, which is regulated by the DEC. Additional work may be required to address and mitigate the release in accordance with DEC rules.

If PCBs are found below the screening level in all rooms tested, then no additional testing or evaluation may be needed. If the school plans demolition or renovation, separate testing may be required at that time.

Is there any funding available to help my school pay for testing?

Act 74, Sec. E.709.1 included the allocation of \$4.5 million to the Environmental Contingency Fund (ECF) to conduct indoor air testing only and will be provided as long as these funds are available. There are no funds allocated for determining the source material of the PCBs in the building or to remediate the PCBs. While funds are available, the DEC will hire an Environmental Consultant to prepare an Indoor Air Sampling Plan and conduct indoor air sampling for PCBs. Indoor air sampling is required regardless of whether funding is available.

Are there any regulations for PCBs in the indoor air of schools?

The DEC regulates the releases of PCBs to indoor air. Depending on the sources and concentrations of PCBs found in the school, the Environmental Protection Agency's (EPA's) Toxic Substances Control Act (TSCA) and its enabling regulations at 40 CFR Part 761 may apply. The EPA and/or the DEC may require a plan for the removal of PCB sources and for the mitigation of PCBs that may have migrated into the building surfaces or other environmental media, such as soil.

How do we prepare to test for PCBs?

Before indoor air testing begins:

1. Review the PCB [decision matrix](#).
2. If applicable, remove any Fluorescent Light Ballasts (FLB).
3. Complete the [PCB checklist](#).
4. While funds are available, the DEC will hire an Environmental Consultant to prepare an Indoor Air Sampling Plan and conduct indoor air sampling for PCBs.

If your school is required to test for PCBs, we encourage you to reach out to the families and staff to let them know that you will be testing the indoor air of the school for PCBs. Letter templates for communicating before testing begins and after results are received will be posted on Health Department's website at www.healthvermont.gov/pcb. Additional information on regulations and requirements for PCBs from the EPA can be found here:

<https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-pcbs>

Who do we contact for additional questions?

If you have questions about sampling indoor air for PCBs, email SOV.PCBSampling@vermont.gov.

