

State of Vermont
 Department of Environmental Conservation
 Waste Management & Prevention Division
 1 National Life Drive – Davis 1
 Montpelier, VT 05620-3704
 (802) 828-1138

PCB School Sampling Tasks/Responsibilities (5/18/22)

Task	Role/Responsibility
Work plan/cost estimate (WPCE) submitted to Sites Management Section (SMS) per school to conduct inventory. Review data from Agency of Education (AOE) for school inventory.	Consultant
SMS issues PO/TO to conduct work	SMS
Consultant coordinates with school to schedule date/time for inventory and IA sampling	Consultant
Consultant notifies SMS, school contact and Superintendent (for public schools) via email about date/time. SMS may attend inventory/sampling dates.	Consultant
Consultant to notify school about templates available for use to provide notice/outreach to their school community. PCBs in Schools Department of Environmental Conservation (vermont.gov) . PCBs in Schools Pre-Testing Notification Letter The pre-testing notification letter can be downloaded here . For the pre-testing notification letter in languages other than English, click the following for Pashto , Nepali , Kirundi , French , Swahili , Vietnamese , Spanish , Dari , Burmese , Bosnian , and Dinka .	Consultant
Consultant will try to conduct /schedule inventory of all schools within SD/SU when first school is scheduled and not wait until the school is scheduled	Consultant
Additional school inventories will need individual WPCE submitted to conduct the inventory	Consultant
SMS will issue a site number for each individual school (unless one already exists). They will be listed as 'release not identified' until a release has been documented.	SMS
*update indoor air sampling date on PCB website	SMS
Identify any obvious sources of PCBs (capacitors) for school to remove and dispose of BEFORE sampling	SMS/Consultant
Provide inventory to SMS with a WPCE to SMS to conduct IA sampling, including grouping rationale, and final report cost. Keep tasks below \$50,000, if possible. Provide school base map with sample locations. Also provide .csv file. Sampling plan should be in line with PCB technical sampling document.	Consultant



If analysis will be conducted by VAEL coordinate with lab and consultant	SMS
Review WPCE and issue PO for IA sampling	SMS
Update PCB database with consultant .csv and base map	SMS
Inform lab that results must be provided to SMS AT THE SAME TIME as they are provided to consultant AND ensure the Unique Sample ID is included in Column B (Sample_Name) of lab .csv file. Lab will use ID from chain of custody. Separate .csv file of individual Aroclors is also requested.	Consultant
Upon receipt of lab.csv file, review for errors (especially units and Unique sample ID is in Column B), upload to database, notify VDH the results are ready for review	SMS
Download Results letter from database and pause the two week database live date. After coordination with VDH, provide results/notification letter (even if PCBs are not detected) to the school and un-pause the two week notification date (date when the database will display the data for that school. Can be sped up if necessary).	SMS
Provide final report and recommendations for next steps within two weeks receipt from lab.	Consultant
If there are detections above SAL notify EPA TSCA Region I coordinator via email and CC Trish Woodward.katherine@epa.gov 617.918.1353	SMS
Upload report to WMID, provide link in PCB database	SMS
If PCBs are detected, work with school through IRULE process to address issues, provide support as needed. As additional results are received continue to update the PCB database.	SMS
Work to coordinate sampling of IA for projects that can benefit from additional assessment with the University of Iowa	SMS

Additional Notes on PCB School Sampling protocol:

1. When conducting inventory, closets can be included as part of the larger space
2. Spaces that were originally one large space, but have been separated by or have dividers, can be considered as 1 space
3. Where it's difficult to determine if different paints were used or applied at different times - paint should NOT be considered for the grouping process (this should be noted)
4. When inspecting lighting fixtures, confirm with school if all have been updated -if "yes" do spot checking of lights
5. Ask building staff to open all spaces and light fixtures and univents for inspection
6. Ask school for any information they have on upgrades, renovations, replacements and if they have any building material sampling reports to share
7. Review the AOE database to get an idea on size of school
8. Ask school for base maps
9. If IA sampling occurs when school is not being used, ask to have the HVAC system working as it would during school use
10. If there are not enough sampling pumps to sample all the groups at the same time, different sampling days can be scheduled, as long as, all groups are sampled at the same time
11. Results are being provided as Aroclor, total Aroclor should be reported as all detections totaled. ND results that are below the identified RL/DL will be assumed to be '0' when totaling.

*Currently SMS will need to provide dates for sampling that will be published on a PDF. We are evaluating ways to allow consultants and/or staff to dates/times on the website