VERMONT
AGENCY OF EDUCATION
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MEMORANDUM

TO: Joint Fiscal Committee
FROM: Daniel M. French, Ed.D., Secretary, Agency of Education
Julia S. Moore, P.E., Secretary, Agency of Natural Resources
RE: Update on Testing for PCBs in Schools
DATE: September 20, 2022

Significant concentrations of PCBs were discovered in indoor air in buildings on the Burlington High School Campus in fall 2020. PCBs are a known carcinogen. In response to concerns that similar conditions might exist in other school buildings statewide, the Legislature passed Act 74 (2021) requiring all schools built or renovated before 1980 to test indoor air for PCBs. Testing in schools began in June 2022. A list of schools required to test and the schedule of testing is available on the DEC website (see https://dec.vermont.gov/waste-management/contaminated-sites/pcbsinschools for more information).

To date, testing has been completed at the following schools: Cavendish, Cabot, Oak Grove (Brattleboro) and Bethel.

In addition, test results are expected back from the lab shortly for Alburgh.

In the four schools where testing has been completed, PCB concentrations were found in the Oak Grove Elementary School in Brattleboro and the Cabot School that exceeded either the School Action Level (SAL) or the Immediate Action Level (IAL) and therefore require prompt attention. Enclosed are the letters that were sent to these schools that summarize the testing and the results. AOE, ANR and VDH continue to provide direct support to these schools in determining their next steps.

As a result of our experience with these schools, we are seeking to simplify our guidance and related communications. We are also engaging with schools more in advance of testing to explore their options relative to ensuring there is no disruption to in-person instruction.

Managing this program is requiring a considerable amount of time to coordinate among the various state agencies and school districts. As we have worked to support these first schools in responding to and mitigating PCB levels, the need to be able to provide flexible funding to schools to allow them to move quickly to identify sources of PCBs and develop and

implement mitigation strategies is essential to minimizing disruption to educational activities. State agencies need some degree of flexibility in responding to the needs of schools as they emerge since there are many variables involved in implementing this testing program. To that end, consistent with Act 178 (2022), we expect to bring forward a request to the E-Board soon to access the first $2.5 million in funding for school-level mitigation, including purchasing and prepositioning key supplies such as specialized air handling units and/or paints, and operational costs, including fitting up alternative spaces for in-person instruction, to ensure continuity of operations in facilities where there is a significant health concern based on the concentration and/or location of the PCB contamination. The importance of being able to provide access to flexible funding is amplified by workforce challenges in the private consulting community that are leading to extended response times, not only in completing the initial assessments, but also in being able to undertake remedial activities.

Our work to develop a future funding plan for PCB remediation work is moving forward in concert with the normal budget development process. We expect to be able to provide recommendations in January, as required by the law, for the balance of $32 million in funding that was set aside by the Legislature to support the remediation of PCBs in school settings.

Enc: Oak Grove Community Letter
Cabot Community Letter

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DEPARTMENT OF HEALTH

To: Mary Kaufmann
Email: mkaufmann@wsesdvt.org
Cc: Mark Speno, Robert Clark, Katherine Woodward, Jill Briggs-Campbell, Agency of Education Secretary Daniel French, Department of Health, Department of Environmental Conservation
Email: mspeno@wsesdvt.org; rclark@wsesdvt.org; Woodward.Katherine@epa.gov; Jill.BriggsCampbell@vermont.gov; Daniel.French@vermont.gov; SOV.PCBSampling@vermont.gov; AHS.PCBSchoolSampling@vermont.gov
Name of school: Oak Grove School
Address: 15 Moreland Street, Brattleboro, VT 05301
School ID: U096
Site number: 20225090

The Health Department (Health) and the Department of Environmental Conservation (DEC) have reviewed the PCB levels detected in the indoor air of your school. In this letter, you will find the results along with an individualized explanation of some options to reduce exposure to students and staff in your school based on the levels of PCBs detected in indoor air. DEC will send a separate letter that will outline requirements to address the PCB levels in indoor air and provide timeframes to conduct the required sampling and/or remediation.

We intend to give you 10 business days to review these results and decide on your occupancy plans before posting the results permanently online.

What was found?

The PCB level in at least one tested room is at or above the applicable Vermont School Action Level:

- 80 ng/m^3 (nanograms per cubic meter) for preschool*
- 60 ng/m^3 for kindergarten through 6th grade
- 100 ng/m^3 for 7th grade through 12th grade

* Site-specific; see section at bottom

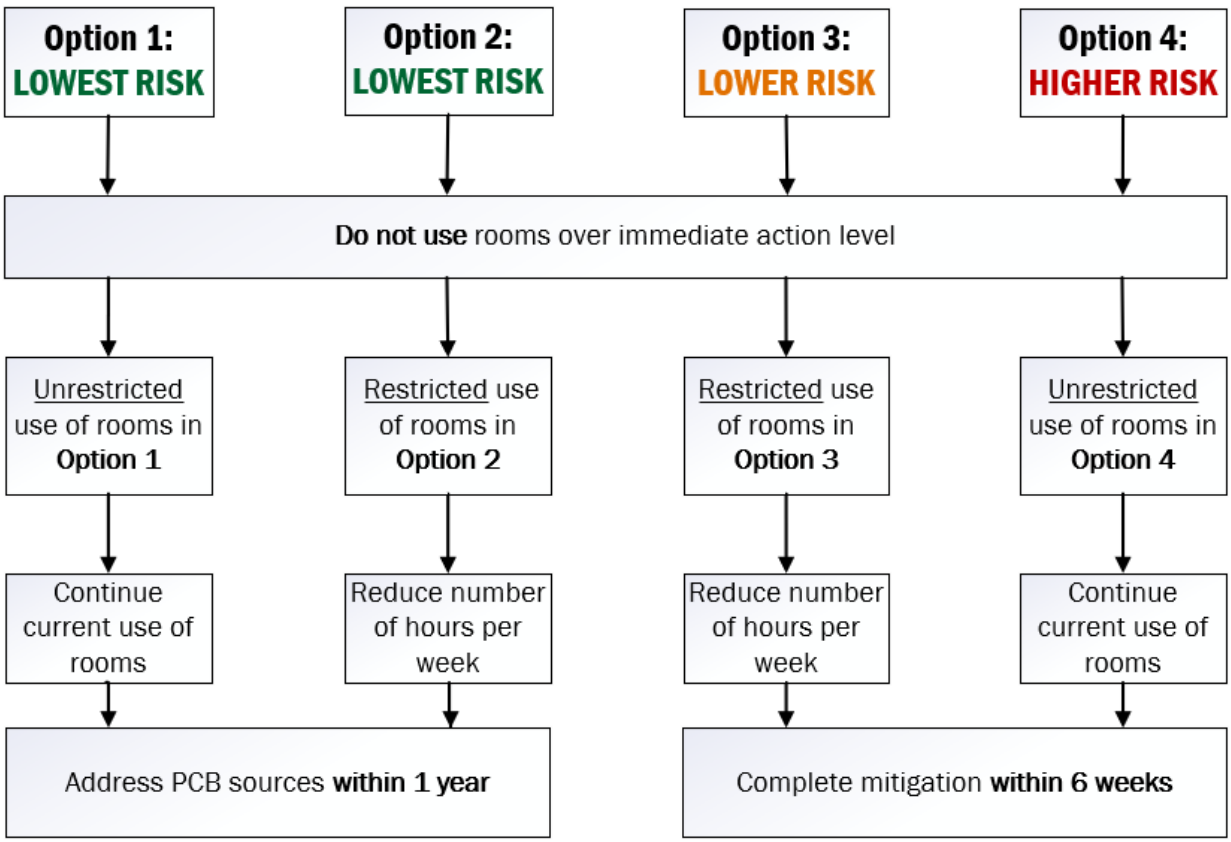
What happens next?

Below you will find four temporary "occupancy options" that you can choose from while you are working with the DEC to address the PCB sources. These occupancy options were created based on the primary occupied spaces including classrooms, offices, the gymnasium, etc. The diagram shows a general outline of the temporary occupancy options. Below the diagram, you will find tables that go into more details about which rooms can be used and for how long. The K-6th advice is protective for all adult staff in the school.

Before testing, the rooms were grouped based on the presence of similar building materials and construction and renovation dates. To provide options on the use of untested rooms, Health extrapolated data from the tested rooms in a group to the untested rooms in that same group.

The temporary occupancy options range from lowest risk of PCB exposure to higher risk of PCB exposure. Health followed the framework for the development of short-term occupancy options. Site-specific considerations and a comparison of all occupancy options are at the end of this document.

You may choose one of the four short-term occupancy options below to reduce exposure to students and staff or email us at SOV.PCBSampling@vermont.gov to discuss other proposed occupancy options. Within 10 business days of receiving this letter, please notify DEC which occupancy option you will implement by emailing SOV.PCBSampling@vermont.gov and your assigned DEC sites management section project manager. A template letter is available on dec.vermont.gov/pcb-schools to help you share the results and occupancy plans with your community.



Rooms at or Above the Immediate Action Level

The immediate action levels are three times higher than the school action levels. Since the immediate action levels pose a greater exposure risk, rooms that are at or above these levels and any untested rooms in a group with one or more rooms at or above these levels **cannot be used**. The Vermont Immediate Action Levels are:

- 240 ng/m^3 for preschool*
- 180 ng/m^3 for kindergarten through 6th grade
- 300 ng/m^3 for 7th grade through 12th grade

* Site-specific; see section at bottom

No rooms were above the IAL at your school.

Temporary Occupancy Options

Options 1 and 2: Lowest Risk

There are two options to achieve the lowest PCB exposure risk to students and staff.

Option 1

In this option:

- You would only use tested rooms below the school action level as many hours per week as needed.
- You would **not** use the other tested rooms that were at or above the school action level.
- You would **not** use untested rooms.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to address the source(s) of PCBs in rooms that are at or above the school action level within one year.

Option 1 **room use guide**:

Room	PCB Concentration (ng/m3)	Preschool		K - 6th Grade	
		Use	Not Use	Use	Not Use
Room 100	ND	✓		✓	
Room 101	ND	✓		✓	
Room 201	ND	✓		✓	
Room 103	ND	✓		✓	
Gym	ND	✓		✓	
Room 112A	ND	✓		✓	
Room 101A	ND	✓		✓	

Room	PCB Concentration (ng/m3)	Preschool		K - 6th Grade	
		Use	Not Use	Use	Not Use
Room 113	ND	✓		✓	
Kitchen	ND	✓		✓	
Classroom 202	10	✓		✓	
Room 203	120		x		x
Room 112	110		x		x
Room 100A	Not Sampled		x		x
Room 100C	Not Sampled		x		x
Room 14	Not Sampled		x		x
Room 200	Not Sampled		x		x
Room 206A	Not Sampled		x		x
Room 102	Not Sampled		x		x
Stage	Not Sampled		x		x
Room 103A	Not Sampled		x		x
Room 103B	Not Sampled		x		x
Room 15	Not Sampled		x		x
Room 204	Not Sampled		x		x
Room 113B	Not Sampled		x		x
Room 113C	Not Sampled		x		x
Room 205	Not Sampled		x		x

ND = Not detected. This means that the laboratory did not detect any PCBs.

Option 2

If your school needs to use more rooms than just those in Option 1, Option 2 gives you another choice that will still allow you to achieve the lowest PCB exposure risk. This option adds use of untested rooms in groups with less than 50% of rooms at or above the school action level. Since using untested rooms introduces some uncertainty, this option reduces the total number of hours per week that students and staff can use the entire school.

In this option:

- You would use all tested rooms less than the school action level.
- You would use untested rooms that fall into a group with no rooms that were at or above the immediate action level **and** less than 50% of rooms that were at or above the school action level.
- Refer to the tables below for which rooms can be used for a particular grade level.
    - Reduce the number of hours per week students and staff use the entire school:
        - Preschool: Use for 30 hours per week

- K-6th: Use for 37 hours per week
- 7th -Adult: Use for 58 hours per week

- Your school will need to work with DEC to address the source(s) of PCBs in rooms that are at or above the school action level within one year.

Option 2 **room use guide**:

Room	PCB Concentration (ng/m3)	Preschool		K - 6th Grade	
		Use	Not Use	Use	Not Use
Room 100	ND	✓		✓	
Room 101	ND	✓		✓	
Room 201	ND	✓		✓	
Room 103	ND	✓		✓	
Gym	ND	✓		✓	
Room 112A	ND	✓		✓	
Room 101A	ND	✓		✓	
Room 113	ND	✓		✓	
Kitchen	ND	✓		✓	
Classroom 202	10	✓		✓	
Room 203	120		x		x
Room 112	110		x		x
Room 100A	Not Sampled	✓		✓	
Room 100C	Not Sampled	✓		✓	
Room 14	Not Sampled	✓		✓	
Room 200	Not Sampled		x		x
Room 206A	Not Sampled		x		x
Room 102	Not Sampled	✓		✓	
Stage	Not Sampled	✓		✓	
Room 103A	Not Sampled		x		x
Room 103B	Not Sampled		x		x
Room 15	Not Sampled	✓		✓	
Room 204	Not Sampled	✓		✓	
Room 113B	Not Sampled	✓		✓	
Room 113C	Not Sampled	✓		✓	
Room 205	Not Sampled	✓		✓	

ND = Not detected. This means that the laboratory did not detect any PCBs.

Option 3: Lower Risk

If Option 1 and 2 are not feasible, Option 3 provides greater use of rooms for a limited number of hours per week. This option adds use of untested rooms in groups with no rooms at or above

the immediate action level. Since using untested rooms introduces some uncertainty, this option reduces the total number of hours per week that students and staff can use the entire school. This option accepts a greater PCB exposure risk than Options 1 and 2, with the timeline for mitigation being shortened to limit the amount of time students and staff are exposed

In this option:

- You would use all tested rooms less than the immediate action level.
- You would use all untested rooms in a group with no rooms at or above the immediate action level.
- Refer to the tables below for which rooms can be used for a particular grade level.
    - Reduce the number of hours per week students and staff use the entire school:
        - Preschool: Use for 30 hours per week
        - K-6th: Use for 37 hours per week
        - 7th -Adult: Use for 58 hours per week
- Your school will need to work with DEC to implement mitigation of the rooms at or above the school action level within six weeks.

Option 4: Higher Risk

If Options 1, 2, and 3 are not feasible, Option 4 allows the least restrictive use of rooms. This option accepts the greatest PCB exposure risk, with the timeline for mitigation being shortened to limit the amount of time students and staff are exposed.

In this option:

- You would use the same rooms as Option 3.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to implement mitigation of the rooms at or above the school action level within six weeks.

Options 3 and 4 **room use guide:**

Room	PCB Concentration (ng/m3)	Preschool		K - 6th Grade	
		Use	Not Use	Use	Not Use
Room 100	ND	✓		✓	
Room 101	ND	✓		✓	
Room 201	ND	✓		✓	
Room 103	ND	✓		✓	
Gym	ND	✓		✓	
Room 112A	ND	✓		✓	
Room 101A	ND	✓		✓	
Room 113	ND	✓		✓	
Kitchen	ND	✓		✓	
Classroom 202	10	✓		✓	

Room	PCB Concentration (ng/m3)	Preschool		K - 6th Grade	
		Use	Not Use	Use	Not Use
Room 203	120	✓		✓	
Room 112	110	✓		✓	
Room 100A	Not Sampled	✓		✓	
Room 100C	Not Sampled	✓		✓	
Room 14	Not Sampled	✓		✓	
Room 200	Not Sampled	✓		✓	
Room 206A	Not Sampled	✓		✓	
Room 102	Not Sampled	✓		✓	
Stage	Not Sampled	✓		✓	
Room 103A	Not Sampled	✓		✓	
Room 103B	Not Sampled	✓		✓	
Room 15	Not Sampled	✓		✓	
Room 204	Not Sampled	✓		✓	
Room 113B	Not Sampled	✓		✓	
Room 113C	Not Sampled	✓		✓	
Room 205	Not Sampled	✓		✓	

ND = Not detected. This means that the laboratory did not detect any PCBs.

Ancillary Spaces

The results for ancillary spaces are below. If a bathroom, stairway, utility room, or other ancillary space is above the school action level you may reduce the occupancy as is practical. By definition these rooms are not occupied all day by staff or students and were sampled to help identify potential sources.

.Room	PCB Concentration (ng/m3)
First floor copy room	ND
Facility Bathroom -Women's	ND
Facility Bathroom - Girls	ND
First floor lobby	ND
Room 100 Closet	Not Sampled
Room 101 Closet	Not Sampled
2nd floor custodial	Not Sampled
Hallway outside 203	Not Sampled
Room 206 bath	Not Sampled
Hall outside 112	Not Sampled
Room 112 bath storage	Not Sampled
Room 112 bathroom	Not Sampled
Basement bath	Not Sampled
Hallway outside 14	Not Sampled

.Room	PCB Concentration (ng/m3)
First floor janitor closet	Not Sampled
2nd floor boys bath	Not Sampled
2nd floor coat closets	Not Sampled
First floor boys bath	Not Sampled
First floor girls bath	Not Sampled
Hallway outside 15	Not Sampled
Southwest stair by room 12	Not Sampled
Room 101A bath	Not Sampled
Main 1st floor hallway	Not Sampled
Northwest stairwell and room 16	Not Sampled
Room 113 lobby	Not Sampled
2nd floor hallway	Not Sampled
North stairwell first to second	Not Sampled

Site Specific Considerations:

The Oak Grove School had three detections of total PCBs in indoor air: room 202 at 9.7 ng/m^3, room 112 at 110 ng/m^3 and room 203 at 120 ng/m^3. The allowable hours per week were calculated using the 95th Upper Confidence Limit (UCL) of the mean of the measured values from the occupied spaces tested, using the Method Reporting Limit for non-detected values. In cases where samples were reported in duplicate, the data were processed to identify a single result as follows: If both analytical results were detected, then the maximum detect was used. If both analytical results were not detected, then the lower of the two detection limits is used. If one analytical result was detected and the other analytical result was not detected, the detected concentration is used.

The occupied spaces included in the 95th UCL are rooms 100, 101, 101A, 103, 112, 112A, 113, 201, 202, 203, Gym and Kitchen. A site-specific Pre-school SAL (80 ng/m^3) and IAL (240 ng/m^3) was calculated for the preschool age group of 3 < 6 years, using exposure parameters provided by the school: 6.75 hours per day, 175 days per year.

In this investigation samples collected in the basement areas (Boiler room, SE Stair, rooms 12, 13 and 15A) had detection limits higher than the SALs due to interference. The laboratory tentatively identified chlordane in the indoor air of the rooms sampled in the basement. Chlordane is a pesticide with similar chemistry to PCBs. Chlordane was legally used as a structural pesticide prior to its registration being canceled by the Environmental Protection Agency (EPA) in 1988. The Vermont Agency of Agriculture, Food and Markets is currently investigating to determine the source to best inform any potential future action.

Questions?

- For **testing and test results questions**, email SOV.PCBSampling@vermont.gov.
- For health-related questions, call 1-800-439-8550.

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DEPARTMENT OF HEALTH

Comparison of all occupancy options:

		Option 1				Option 2				Options 3/4			
Room	**PCB Concentration (ng/m3)**	**Pre-K**		**K - 6th Grade**		**Pre-K**		**K - 6th Grade**		**Pre-K**		**K - 6th Grade**	
		Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use
Room 100	ND	✓		✓		✓		✓		✓		✓	
Room 101	ND	✓		✓		✓		✓		✓		✓	
Room 201	ND	✓		✓		✓		✓		✓		✓	
Room 103	ND	✓		✓		✓		✓		✓		✓	
Gym	ND	✓		✓		✓		✓		✓		✓	
Room 112A	ND	✓		✓		✓		✓		✓		✓	
Room 101A	ND	✓		✓		✓		✓		✓		✓	
Room 113	ND	✓		✓		✓		✓		✓		✓	
Kitchen	ND	✓		✓		✓		✓		✓		✓	
Classroom 202	10	✓		✓		✓		✓		✓		✓	
Room 203	120		x		x		x		x	✓		✓	
Room 112	110		x		x		x		x	✓		✓	
Room 100A	Not Sampled		x		x	✓		✓		✓		✓	

		Option 1				Option 2				Options 3/4			
Room	**PCB Concentration (ng/m3)**	**Pre-K**		**K - 6th Grade**		**Pre-K**		**K - 6th Grade**		**Pre-K**		**K - 6th Grade**	
		Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use
Room 100C	Not Sampled		x		x	✓		✓		✓		✓	
Room 14	Not Sampled		x		x	✓		✓		✓		✓	
Room 200	Not Sampled		x		x		x		x	✓		✓	
Room 206A	Not Sampled		x		x		x		x	✓		✓	
Room 102	Not Sampled		x		x	✓		✓		✓		✓	
Stage	Not Sampled		x		x	✓		✓		✓		✓	
Room 103A	Not Sampled		x		x		x		x	✓		✓	
Room 103B	Not Sampled		x		x		x		x	✓		✓	
Room 15	Not Sampled		x		x	✓		✓		✓		✓	
Room 204	Not Sampled		x		x	✓		✓		✓		✓	
Room 113B	Not Sampled		x		x	✓		✓		✓		✓	
Room 113C	Not Sampled		x		x	✓		✓		✓		✓	
Room 205	Not Sampled		x		x	✓		✓		✓		✓	

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DEPARTMENT OF HEALTH

To: Mark Tucker
Email: Mark.tucker@ccsuvt.net
Cc: Shawn McNamara, Katherine Woodward, Jill BriggsCampbell, Secretary Daniel French , Health, DEC
Email: shawn.mcnamara@ccsuvt.net; Woodward.Katherine@epa.gov; Jill.BriggsCampbell@vermont.gov; Daniel.French@vermont.gov; SOV.PCBSampling@vermont.gov; AHS.PCBSchoolSampling@vermont.gov
Name of school: Cabot School
Address 25 Common Road, Cabot, VT 05647
School ID: T038
Site number: 20225101

The Health Department (Health) and the Department of Environmental Conservation (DEC) have reviewed the PCB levels in the indoor air of your school. In this letter, you will find the results along with an individualized explanation of some options to reduce exposure to students and staff in your school based on the levels of PCBs detected in indoor air. DEC will send a separate letter that will outline requirements to address the PCB levels in indoor air and provide timeframes to conduct the required sampling and/or remediation.

We intend to give you 10 business days to review these results and decide on your occupancy plans before posting the results permanently online.

What was found?

The PCB level in at least one tested room is at or above the applicable Vermont School Action Level:

- 30 ng/m^3 (nanograms per cubic meter) for pre-kindergarten
- 60 ng/m^3 for kindergarten through 6th grade
- 100 ng/m^3 for 7th grade through 12th grade

What happens next?

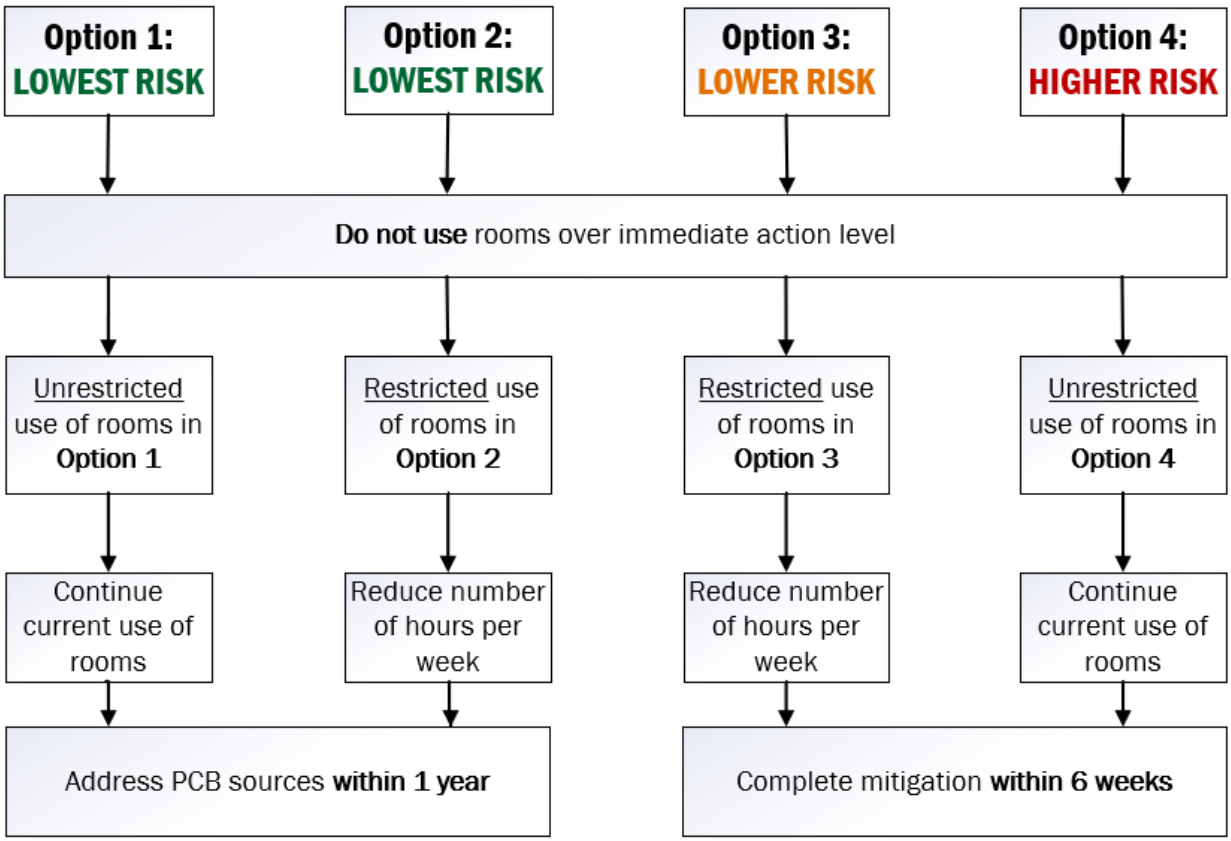
Below you will find four temporary “occupancy options” that you can choose from while you are working with the DEC to address the PCB sources. These occupancy options were created based on the primary occupied spaces including classrooms, offices, the gymnasium, etc. The diagram shows a general outline of the temporary occupancy options. Below the diagram, you will find tables that go into more details about which rooms can be used and for how long.

Before testing, the rooms were grouped based on the presence of similar building materials and construction and renovation dates. To provide options on the use of untested rooms,

Health extrapolated data from the tested rooms in a group to the untested rooms in that same group.

The temporary occupancy options range from lowest risk of PCB exposure to higher risk of PCB exposure. Health followed the framework for the development of short-term occupancy options. Site-specific considerations and a comparison of all occupancy options are at the end of this document.

You may choose one of the four short-term occupancy options below to reduce exposure to students and staff, or email us at SOV.PCBSampling@vermont.gov to discuss other proposed occupancy options. Within 14 days of receiving this letter, please notify DEC which occupancy option you will implement by emailing SOV.PCBSampling@vermont.gov and your assigned DEC sites management section project manager. A template letter is available on dec.vermont.gov/pcb-schools to help you share the results and occupancy plans with your community.



Rooms at or Above the Immediate Action Level

The immediate action levels are three times higher than the school action levels. Since these levels pose a greater exposure risk, rooms that are at or above these levels and any untested rooms in a group with one or more rooms at or above the immediate action level **cannot be used**. The Vermont Immediate Action Levels are:

- 90 ng/m^3 for pre-kindergarten
- 180 ng/m^3 for kindergarten through 6th grade
- 300 ng/m^3 for 7th grade through 12th grade

Do not use these rooms in any of the temporary occupancy options listed below.

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Stage Area	210		x		x	✓	
Building 4A Art Room	120		x	✓		✓	
Gym	110		x	✓		✓	
Building 4A Shop Class	Not Sampled		x	✓		✓	

Temporary Occupancy Options

Options 1 and 2: Lowest Risk

There are two options to achieve the lowest PCB exposure risk to students and staff.

Option 1

In this option:

- You would only use tested rooms below the school action level as many hours per week as needed.
- You would **not** use the other tested rooms that were at or above the school action level.
- You would **not** use untested rooms.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to address the source(s) of PCBs in rooms that are at or above the school action level within one year.

Option 1 **room use guide**:

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Library	10	✓		✓		✓	
Main Building Classroom 309	9	✓		✓		✓	
Main Building Classroom 301	8	✓		✓		✓	
PE Office	27	✓		✓		✓	
Stage Area	210		x		x		x
Main Building Classroom 302	13	✓		✓		✓	
Building 4A Art Room	120		x		x		x
Gym	110		x		x		x
Building 4B 1st Floor Main Classroom	ND	✓		✓		✓	
Building 4B 2nd Floor Main Classroom	ND	✓		✓		✓	
Building 4D Main Classroom	ND	✓		✓		✓	
Building 4D Staff Room	ND	✓		✓		✓	
Main Building Counselor's Suite	ND	✓		✓		✓	
Main Building Middle School	ND	✓		✓		✓	
Main Building Multipurpose Classroom	ND	✓		✓		✓	
Main Building Science Room	ND	✓		✓		✓	
Building 4A Music Room	Not Sampled		x		x		x
Building 4A Shop Class	Not Sampled		x		x		x
Building 4B Speech Room	Not Sampled		x		x		x
Building 4C Classroom	Not Sampled		x		x		x
Building 4C Computer Lab	Not Sampled		x		x		x
Building 4C Staff Room	Not Sampled		x		x		x
Building 4D Classroom	Not Sampled		x		x		x
Building 4D Office	Not Sampled		x		x		x
Main Building Classroom 103	Not Sampled		x		x		x
Main Building Classroom 110	Not Sampled		x		x		x
Main Building Classroom 306	Not Sampled		x		x		x

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Classroom 307	Not Sampled		x		x		x
Main Building Inner Library	Not Sampled		x		x		x
Main Building Main Office	Not Sampled		x		x		x
Main Building Principal's Office	Not Sampled		x		x		x

ND = Not detected. This means that the laboratory did not detect any PCBs.

Option 2

If your school needs to use more rooms than just those in Option 1, Option 2 gives you another choice that will still allow you to achieve the lowest PCB exposure risk. This option adds use of untested rooms in groups with less than 50% of rooms at or above the school action level. Since using untested rooms introduces some uncertainty, this option may reduce the total number of hours per week that students and staff can use the entire school.

In this option:

- You would use all tested rooms less than the school action level.
- You would use untested rooms that fall into a group with no rooms that were at or above the immediate action level **and** less than 50% of rooms that were at or above the school action level.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to address the source(s) of PCBs in rooms that are at or above the school action level within one year.
- Consider the number of hours per week students and staff use the entire school:
    - Preschool: Use for unlimited (> 50) hours per week
    - K-6th: Use for unlimited (> 50) hours per week
    - 7th -Adult: Use for unlimited (> 50) hours per week

Option 2 **room use guide:**

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Library	10	✓		✓		✓	
Main Building Classroom 309	9	✓		✓		✓	

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Classroom 301	8	✓		✓		✓	
PE Office	27	✓		✓		✓	
Stage Area	210		x		x		x
Main Building Classroom 302	13	✓		✓		✓	
Building 4A Art Room	120		x		x		x
Gym	110		x		x		x
Building 4B 1st Floor Main Classroom	ND	✓		✓		✓	
Building 4B 2nd Floor Main Classroom	ND	✓		✓		✓	
Building 4D Main Classroom	ND	✓		✓		✓	
Building 4D Staff Room	ND	✓		✓		✓	
Main Building Counselor's Suite	ND	✓		✓		✓	
Main Building Middle School	ND	✓		✓		✓	
Main Building Multipurpose Classroom	ND	✓		✓		✓	
Main Building Science Room	ND	✓		✓		✓	
Building 4A Music Room	Not Sampled	✓		✓		✓	
Building 4A Shop Class	Not Sampled		x	✓		✓	
Building 4B Speech Room	Not Sampled	✓		✓		✓	
Building 4C Classroom	Not Sampled	✓		✓		✓	
Building 4C Computer Lab	Not Sampled	✓		✓		✓	
Building 4C Staff Room	Not Sampled	✓		✓		✓	
Building 4D Classroom	Not Sampled	✓		✓		✓	
Building 4D Office	Not Sampled	✓		✓		✓	
Main Building Classroom 103	Not Sampled	✓		✓		✓	
Main Building Classroom 110	Not Sampled	✓		✓		✓	
Main Building Classroom 306	Not Sampled	✓		✓		✓	
Main Building Classroom 307	Not Sampled	✓		✓		✓	
Main Building Inner Library	Not Sampled	✓		✓		✓	

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Main Office	Not Sampled	✓		✓		✓	
Main Building Principal's Office	Not Sampled	✓		✓		✓	

ND = Not detected. This means that the laboratory did not detect any PCBs.

Option 3: Lower Risk

If Option 1 and 2 are not feasible, Option 3 provides greater use of rooms for a limited number of hours per week. This option adds use of untested rooms in groups with no rooms at or above the immediate action level. Since using untested rooms introduces some uncertainty, this option may reduce the total number of hours per week that students and staff can use the entire school. This option accepts a greater PCB exposure risk than Options 1 and 2, with the timeline for mitigation being shortened to limit the amount of time students and staff are exposed

In this option:

- You would use all tested rooms less than the immediate action level.
- You would use all untested rooms in a group with no rooms at or above the immediate action level.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to implement mitigation of the rooms at or above the school action level within six weeks.
- Consider the number of hours per week students and staff use the entire school:
    - Preschool: Use for unlimited (> 50) hours per week
    - K-6th: Use for unlimited (> 50) hours per week
    - 7th -Adult: Use for unlimited (> 50) hours per week

Option 4: Higher Risk

If Options 1, 2, and 3 are not feasible, Option 4 allows the least restrictive use of rooms. This option accepts the greatest PCB exposure risk, with the timeline for mitigation being shortened to limit the amount of time students and staff are exposed.

In this option:

- You would use the same rooms as Option 3.
- Refer to the tables below for which rooms can be used for a particular grade level.
- Your school will need to work with DEC to implement mitigation of the rooms at or above the school action level within six weeks.

Options 3 and 4 **room use guide.**

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Library	10	✓		✓		✓	
Main Building Classroom 309	9	✓		✓		✓	
Main Building Classroom 301	8	✓		✓		✓	
PE Office	27	✓		✓		✓	
Stage Area	210		x		x	✓	
Main Building Classroom 302	13	✓		✓		✓	
Building 4A Art Room	120		x	✓		✓	
Gym	110		x	✓		✓	
Building 4B 1st Floor Main Classroom	ND	✓		✓		✓	
Building 4B 2nd Floor Main Classroom	ND	✓		✓		✓	
Building 4D Main Classroom	ND	✓		✓		✓	
Building 4D Staff Room	ND	✓		✓		✓	
Main Building Counselor's Suite	ND	✓		✓		✓	
Main Building Middle School	ND	✓		✓		✓	
Main Building Multipurpose Classroom	ND	✓		✓		✓	
Main Building Science Room	ND	✓		✓		✓	
Building 4A Music Room	Not Sampled	✓		✓		✓	
Building 4A Shop Class	Not Sampled		x	✓		✓	
Building 4B Speech Room	Not Sampled	✓		✓		✓	
Building 4C Classroom	Not Sampled	✓		✓		✓	
Building 4C Computer Lab	Not Sampled	✓		✓		✓	
Building 4C Staff Room	Not Sampled	✓		✓		✓	
Building 4D Classroom	Not Sampled	✓		✓		✓	
Building 4D Office	Not Sampled	✓		✓		✓	
Main Building Classroom 103	Not Sampled	✓		✓		✓	
Main Building Classroom 110	Not Sampled	✓		✓		✓	

Room	PCB Concentration (ng/m3)	Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use
Main Building Classroom 306	Not Sampled	✓		✓		✓	
Main Building Classroom 307	Not Sampled	✓		✓		✓	
Main Building Inner Library	Not Sampled	✓		✓		✓	
Main Building Main Office	Not Sampled	✓		✓		✓	
Main Building Principal's Office	Not Sampled	✓		✓		✓	

ND = Not detected. This means that the laboratory did not detect any PCBs.

Ancillary Spaces

The results for ancillary spaces are below. If a bathroom, stairway, utility room, or other ancillary space is above the school action level you may reduce the occupancy as is practical. By definition these rooms are not occupied all day by staff or students and were sampled to help identify potential sources.

Room	PCB Concentration (ng/m3)
Gym Girls Bath/Locker Room	77
Building 4A Floor 1 Bathroom	55
Gym Stairway	43
Gym North Entry/Lobby	36
Gym Hallway	33
Main Building Main Hallway 1	20
Gym Boys Bathroom	13
Gym Storage/Mechanical Area	110
Storage Area Stage Right	110
Building 4A Storage/Electrical Closet	100
Building 4B Foyer	ND
Building 4B Stairway	ND
Building 4B Storage/Electrical Closet	ND
Building 4C Coatroom	ND
Building 4C Floor 2 Bathroom 1	ND
Building 4C Foyer	ND

Room	PCB Concentration (ng/m3)
Building 4D Floor 2 Bathroom 2	ND
Main Building Boys Bathroom	ND
Main Building Main Hallway	ND
Main Building Mechanical Room	ND
Main Building Mezzanine Entryway	ND
Building 4A Foyer	Not Sampled
Building 4B Coatroom	Not Sampled
Building 4B Floor 1 Bathroom	Not Sampled
Building 4B Floor 2 Bathroom 1	Not Sampled
Building 4B Floor 2 Bathroom 2	Not Sampled
Building 4C Floor 1 Bathroom	Not Sampled
Building 4C Floor 2 Bathroom 2	Not Sampled
Building 4C Stairwell	Not Sampled
Building 4C Storage/Electrical Rm	Not Sampled
Building 4D Floor 1 Bathroom	Not Sampled
Building 4D Floor 2 Bathroom 1	Not Sampled
Building 4D Foyer	Not Sampled
Building 4D Stairwell	Not Sampled
Building 4D Storage/Electrical Rm	Not Sampled
Gym Boys Bath/Locker room	Not Sampled
Gym Girls Bathroom	Not Sampled
Gym Storage Area	Not Sampled
Main Building Girls Bathroom	Not Sampled
Main Building Unisex Bathroom	Not Sampled
Main Building Hallway	Not Sampled
Main Building Health Center Entry	Not Sampled
Main Building Main Entryway	Not Sampled

Site Specific Considerations:

The allowable hours per week were calculated using the 95th Upper Confidence Limit (UCL) of the mean of the measured values from the occupied spaces tested, using the Method Reporting Limit for non-detected values as described below. The actual calculated hours per week are 124 hours for pre-kindergarten, 77 hours for K-6th grade, and 79 hours for 7th grade – adult. These hours are described in the text as unlimited.

Occupied Rooms in the 95th UCL for all tested rooms included: Building 4A Art Room, Building 4B 1st Floor Main Classroom, Building 4B 2nd Floor Main Classroom, Building 4D Main Classroom, Building 4D Staff Room, Gym, Main Building Classroom 301, Main Building Classroom 302, Main Building Classroom 309, Main Building Counselor's Suite, Main Building Library, Main Building Middle School, Main Building Multipurpose Classroom, Main Building Science Room, PE Office, Stage Area.

Rooms were omitted from 95th UCL for Pre-K and K-6 due to a detect of total PCBs greater than the immediate action level. For Pre-K the Building 4A Art Room, Gym, and Stage Area were omitted from the 95th UCL. The 95th UCL for Grade K-6 omitted the Stage Area.

Questions?

- For **testing and test results questions**, email SOV.PCBSampling@vermont.gov.
- For health-related questions, call 1-800-439-8550.

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DEPARTMENT OF HEALTH

Comparison of all occupancy options:

Room	PCB Concentration (ng/m3)	Option 1						Option 2						Options 3/4					
		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use
Main Building Library	10	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Classroom 309	9	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Classroom 301	8	✓		✓		✓		✓		✓		✓		✓		✓		✓	
PE Office	27	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Stage Area	210		x		x		x		x		x		x		x		x	✓	
Main Building Classroom 302	13	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Building 4A Art Room	120		x		x		x		x		x		x		x	✓		✓	
Gym	110		x		x		x		x		x		x		x	✓		✓	
Building 4B 1st Floor Main Classroom	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Building 4B 2nd Floor Main Classroom	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Building 4D Main Classroom	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	

Room	PCB Concentration (ng/m3)	Option 1						Option 2						Options 3/4					
		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use
Building 4D Staff Room	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Counselor's Suite	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Middle School	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Multipurpose Classroom	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Main Building Science Room	ND	✓		✓		✓		✓		✓		✓		✓		✓		✓	
Building 4A Music Room	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4A Shop Class	Not Sampled		x		x		x		x	✓		✓			x	✓		✓	
Building 4B Speech Room	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4C Classroom	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4C Computer Lab	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4C Staff Room	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4D Classroom	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Building 4D Office	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Classroom 103	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	

Room	PCB Concentration (ng/m3)	Option 1						Option 2						Options 3/4					
		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult		Pre-K		K - 6th Grade		7th Grade - Adult	
		Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use	Use	Not Use
Main Building Classroom 110	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Classroom 306	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Classroom 307	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Inner Library	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Main Office	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	
Main Building Principal's Office	Not Sampled		x		x		x	✓		✓		✓		✓		✓		✓	