

State of Vermont, Agency of Natural Resources Department of Environmental Conservation

MEMORANDUM

To: Senate Committee on Education

From: Matt Chapman, Director, Waste Management and Prevention, Department of

Environmental Conservation

Re: Explanation of PCB standards

Date: April 17, 2024

What is a screening level?

A screening level is normally used at the outset of an investigation into environmental contamination to evaluate whether further investigation of that contaminant is needed. EPA establishes screening values, known as the Regional Screening Levels or RSLs, for various environmental media (e.g. indoor air, groundwater, soil). The Vermont Investigation and Remediation of Contaminated Properties Rule uses those values to identify if a contaminant should be evaluated further and to set cleanup goals when no other cleanup value exists. Vermont's screening value for indoor air at schools is 15 ng/m³. EPA's screening value for indoor air is 4.9 ng/m³. These values are not currently used in managing PCB contamination at Vermont Schools.

What are Vermont and EPA values to address indoor air PCB contamination at schools?

	Pre-Kindergarten	Grade K – 6	Grade 7 – adult
VT SALs	30	60	100
EPA Exposure Levels	100 (1 yr. old – 3 yr. old); 300 (3 yr. old – 6 yr. old)	300 (6 yr. old – 12 yr. old)	500 (over 12)

All values in ng/m³.

Why are EPA's values under TSCA different than Vermont's values?

There are two primary reasons why Vermont's standards are different than EPAs. First, EPA protects to the average person and not the most sensitive population. As a result, more than 50 percent of Vermont students and teachers would be subjected to an unacceptable exposure under EPAs approach. Second, Vermont accounts for exposure to non-school air differently than EPA. In addition, EPA is relying on data from 1994 – 30 years old – and the scientific understanding of PCBs adverse impacts on human health has expanded since then.