

1 National Life Drive, Davis 3 Montpelier, Vermont 05620-3704 Telephone: 802-828-1138

Dear Senator Campion and members of the Senate Committee on Education:

I know that there has been a great deal of testimony throughout the session on PCBs and their impact on schools. I wanted to provide some very brief background information and key points on the program. There is a great deal of additional information available and I would happy to answer any questions.

- PCBs are known carcinogens that also have numerous additional adverse non-cancer health effects. PCBs were used in building materials, such as caulking, glues and mastics, and as insulation in electrical equipment between 1930 and 1980. In 1979 EPA banned the use of PCBs.
- Over the past several years, inhalation of PCBs in indoor air has become an exposure pathway of greater concern. Indoor air in schools is often above ambient air concentrations at federal Superfund sites being remediated for PCBs. Approximately 40 percent of schools tested to date exceed the Vermont standards for PCBs.
- The program that has been developed by the State of Vermont to test for and remediate PCBs in schools has been developed thoughtfully and in consultation with national experts and Vermont school officials. It follows the Investigation and Remediation of Contaminated Properties Rule that is used to remediate all other toxic or hazardous wastes. In addition, when developing the program we accepted comments from interested parties, including school officials, before the program began and have continued to listen to schools after the program began and adjusted the program in response to concerns raised by those schools. We have made significant efforts to be adaptive and flexible to school concerns while protecting health.
- The program prioritized schools that were likely to have the highest levels of PCBs based on their history and those with the highest levels of free and reduced lunch.
- The program was designed with an appreciation of the impacts of disrupted learning on students with an objective to minimize that impact. There are several steps we can take to accomplish that goal:
 - The program allows schools to continue using impacted rooms for limited amounts of time while remediation options are considered or mitigation installed.
 - The program allows for mitigation measures (increasing ventilation or providing filtration or ways to seal or create a barrier with the PCB containing materials) allowing unrestricted use of the area while remediation options are considered.
- Once PCBs in indoor air have been mitigated, the program can speed up remediation of contaminated building materials to address school concerns or slow down remediation to coordinate with other school construction.

Please let me know if there are questions on how the program works and I would be happy to come to the Committee if there are additional concerns.