4-14-26
Testimony, Elaine Collins
Senate Education Committee
Topic: PCB Bill

Hello,

For the record, I am Elaine Collins, and I'm in my fourth year as the superintendent of North Country Supervisory Union in the Northeast Kingdom of Vermont. The schools in my supervisory union are Brighton Elementary School, Charleston Elementary School, Coventry Village School, Derby Elementary School, Jay-Westfield Elementary School, Lowell Graded School, Newport City Elementary School, Newport Town School, North Country Career Center, North Country Union High School, North Country Union Junior High School, and Troy School. We have approximately 2630 students in NCSU.

Of the twelve sites mentioned, five of them were identified during the 2022 – 2023 school year as having higher-than-acceptable PCB limits: Brighton Elementary School, Charleston Elementary School, Derby Elementary School, Newport City Elementary School, and North Country Career Center/North Country Union High School.

Before we get into the North Country Supervisory Union's specifics, some general background about PCBs:

Acceptable limits for PCBs in air sampling:
PreK: 30
K – 6: 60
7th – adult: 100

Anything that is above these acceptable limits is a school action level (SAL), which may trigger mitigation or remediation. If the number is three times or more than the acceptable limit, this is an immediate action level (IAL). If there are results that are in the IAL or above, modifications to the amount of time that students use the room (occupancy) need to be put into place.

When air sampling happens, the school is broken up into groups, determined by rooms that have similarities, like the same kinds of building materials, lighting, univents, or paint. Once the groups are determined, 30% of each group is tested, and then the data is applied broadly across the entire group. When more than one room is tested in a group, the higher results are used to determine the occupancy of the room. So if two rooms have two different results, the higher number is used to determine how long a student can be in all the rooms of that group.

Testing for NCSU schools happened during the 2022 – 2023 school year. Incidentally, my first year as the NCSU superintendent.

NCSU Specifics

Charleston and Derby had PCBs identified in a boiler/electrical room. Since both buildings were due to have significant upgrades or replacements done by the next summer in those rooms, the schools worked with DEC, AoE, and VDOH to get rid of the PCBs in those schools as part of the planned work.

Newport City had PCBs in a janitorial closet and in a bathroom in their primary wing. However, without identifying a source, as they continued to do air sampling, the numbers began coming down to an acceptable amount. At this point, Newport City is on a periodic monitoring schedule for air quality, and their numbers continue to stay in the normal acceptable range. There is no plan to do anything except to continue to monitor the air quality there.

Brighton had PCB levels that were in the 200's in their PreK room. Since this was in the IAL for all students PreK – 6, we had to make some significant changes. PreK ended their year in May. K – 6 students had to limit the amount of time they were in the building to no more than 20 hours per week. Seventh and eighth graders could be in the building without restriction. Carbon air filters were installed in every classroom, and then the following year, PreK was held off-site at a local church, and the numbers had come down enough for K – 6 students to be in the classrooms without restriction. While PreK was off-site, we began the planning to bring a modular classroom onsite so that we could have PreK staff and students as part of the school community and on the same building site as the K – 8 student body. The planning was slow: the lingering effects of COVID and flooding impacts kept this from happening until the summer of 2024, with the students moving into the modular classroom in the fall of 2024. During this time, without being able to identify a source – and subsequently not doing any remediation at all – the amount of PCBs in the air at Brighton continued to fall to the point where we were able to have PreK back in the building, which as it turns out was a good thing, because the modular was completely unsuitable for NEK winters and we had an exorbitant amount of issues with it. We ended up moving the PreK students back into the school in mid-winter, with the blessing of VDOH, AoE, and DEC and we sent the modular back to the manufacturer early. All this work in the four schools, including Brighton, was approximately $500,000.

And then there is the high school. North Country Union High School and North Country Career Center have about 720 students in grades 9 – 12. As a general timeline:

*January, 2023 – air tests were high
*Spring, 2023 – 134 carbon air filters were installed and increased air flow was encouraged
*August, 2023 – more air tests performed to confirm the January, 2023 data
*September, 2023 – more air tests were performed to confirm their accuracy . . . the data was getting worse, not better
*December, 2023 – B-wing and C-wing doors, windows and expansion joints were encapsulated

*January, 2024 – more air tests
*April, 2024 – selected C-wing (Career Center) classrooms did some additional mitigation
*May, 2024 – planning for a $3.1 million mitigation project in C wing
*June, 2024 – more air tests, which showed as much as 1800 in some classrooms, including B wing
*June – August, 2024 – upscaled $5.2 million mitigation project to grind down all the caulking in the classrooms around the windows, doors, and expansion joints, recaulk all of those areas, and then encapsulate. Also painting all the walls with two coats of epoxy paint.
*August, 2024 – air tests showed the project didn't work so we couldn't use most of the academic classrooms in B wing. We planned for educating 720 students in tents and other rooms/buildings (approximately $500,000 for this plan)
*September, 2024 – the remediated rooms were allowed more time to literally let the dust settle and a "wind tunnel" was created in each classroom in a zero-gravity environment to overturn the air 6 times an hour. This took several days to do for all the classrooms.
*October 15, 2024 – students were allowed back in the classrooms. It snowed the next day.

During the summer of 2025, more air testing was done. There were some classrooms that were as high as 1800, like the previous summer. But we were told there were no occupancy restrictions, even though the summer before we had to make plans to educate in tents. The reasons for this included having enough data points to support using average numbers to calculate occupancy recommendations and that there is a real correlation to higher PCB numbers during the hot, humid months when students aren't in the classrooms. The cynic in me wonders about whether money for mitigation might play a factor in this decision. The teachers' union, rightfully so, had a lot of questions about this. So didn't we.

For NCCC/NCUHS, there is an additional projects that are slated to be completed during this school year for mitigation of the soil ($135,000 for a rubber roofing mat to be placed on top of the soil to keep PCBs from being sucked into the univents back into the building). This coupled with the most recent invoice for $560,000 for air duct cleaning, air sampling, and consultant fees for the first part of this school year brings us to about $8.5 million for NCUHS/NCCC and $9 million for all the NCSU schools.

In my estimation, the PCB testing program is a complete failure. It is not because people who are helping us through this program aren't well intentioned or working hard. We have had great support from departments and agencies to help us navigate this difficult pathway. It's because there was no long-range plan. Or even really a short-range plan. We have been guinea pigs the entire time. During the worst of the testing results at NCUHS, when we asked what would happen if the results didn't get better, we were told "we're going to hope they get better." My comeback was that "Hope is not a strategy. What is the real action we will take?"

We've been told the money is gone and that we may be on the hook for the ongoing air sampling, consultants' fees, and/or other mitigation efforts, to the tune of $250,000 per year. At a time when we are in a financial crisis, and education is being blamed for it, to add in even more PCB-related costs to local schools' budgets seems extraordinarily unfair. If that were to happen, because we are a union high school, every union town in our supervisory union would have to pay a part of the PCB-related costs.

The testing of the superstructure of the high school building shows that PCBs have soaked into the concrete pillars of the building from 1" – 5" in the middle of the pillars. This is because window caulking is the greatest emitter of PCBs at NCUHS, and the windows joined the pillars in the middle. Our consultants tell us that the structural integrity would likely be compromised if we were to try to shave out 5" from the middle of the pillars that are holding up the building. No surprise there. And even if we could do that, how much would it cost? For a 60-year-old building? We are very likely going to have to rebuild. How much will that cost?

Regardless of whether new PCB testing is stopped in the state of Vermont, we can't unring NCUHS's bell. We have PCBs, the EPA knows we have PCBs, and we are under a timeline of 3 – 5 years to either encapsulate and control PCBs in perpetuity or get rid of them entirely. If we had used the $9+ million and counting to put towards a new building, this seems like a much smarter way to use a huge pot of money.

I urge you to either stop testing for PCBs or, in lieu of that, to have a much better plan in place for how you're going to pay for PCB remediation and mitigation once you find them in schools. Although the high school and career center are an extraordinary case – even worse than Burlington High School, we've been told – there may be more North Country Union High Schools out there and there should be a plan for where the money is coming from. And the schools who are still contending with the burden of PCBs need to be made whole. It is the state's policy that got us to this place, and it should be the state's burden to help us figure out where to go from here.

The disruption to the work of schools – already reeling and trying to get back to being grounded from COVID – cannot be discounted. The medical field has the practice of "first do no harm," something I wish the legislature would consider when it comes to enacting sweeping changes and mandates that affect our children's education.

You've likely heard my dad's saying before – likely from me – but it helps to illustrate my final point: sometimes you have to stop chasing the cows long enough to build the fence. The PCB mitigation and remediation efforts thus far have been chasing the cows. In some schools, this process will eventually lead to a likely rebuild, and if so, we should be looking at this from a long-range, building-the-fence perspective – and stop pouring millions of dollars into a school that will likely need to be rebuilt. We have to partner this continued PCB work with School Construction Aid.