

REGION 1 – PCBs in Schools and Buildings

Internal deliberative pre-decisional - FOR USE BY 2024 PRESIDENT-ELECT TRANSITION TEAM MEMBERS ONLY

ISSUE SUMMARY: PCBS IN SCHOOLS AND BUILDINGS

PCBs in building materials, particularly in schools, continues to be a focus of political and press attention and heightened community concern in New England. Buildings and other structures identified with PCBs in manufactured building materials pose potential risks to building inhabitants including exposure to unacceptable levels of PCBs in indoor air.

(b) (5)

. In 2021, Vermont passed Act 74 requiring that all schools (~320) built or renovated before 1980 test indoor air for PCBs and, if found above state action levels, address the associated risk.

UPCOMING MILESTONES:

Region 1 anticipates (b) (5)

BACKGROUND:

The federal PCB regulations at 40 CFR Part 761 establish requirements related to use, storage, cleanup, and disposal of PCBs. Implementation of the PCB program cannot be delegated to states. PCBs were used in numerous building products prior to their ban in 1979. The prevalence of PCBs in New England schools is well-documented EPA's regulations prohibit the use of PCBs in building materials at levels greater than or equal to 50 ppm. When identified, these ≥ 50 ppm PCBs must be removed and properly disposed. Likewise, any contaminated surrounding materials need to be addressed. However, removal and disposal are costly, and schools may not have available funding to expeditiously address PCB-contaminated building materials. Under the current PCB regulations, there is no requirement to test for PCBs in building materials or indoor air. Generally, EPA cannot compel building owners to conduct sampling to determine if PCBs are present. EPA guidance recommends indoor air sampling as an initial test where PCBs in building material is suspected. Regardless of whether PCBs are known to be present, EPA recommends that all schools and other buildings built or renovated between 1950 and 1979 implement practical actions to minimize potential building occupant exposures to PCBs, including removing PCB-containing fluorescent light ballasts and implementing best management practices.

KEY EXTERNAL STAKEHOLDERS:

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| <input checked="" type="checkbox"/> Congress | <input checked="" type="checkbox"/> Industry | <input checked="" type="checkbox"/> States | <input type="checkbox"/> Tribes | <input checked="" type="checkbox"/> Media | <input checked="" type="checkbox"/> Other Federal Agency |
| <input type="checkbox"/> NGO | <input checked="" type="checkbox"/> Local Governments | <input type="checkbox"/> Other (name of stakeholder) | | | |

MOVING FORWARD:

Where PCBs are identified, EPA Region 1 works with each school (or other building owners) and related stakeholders to address the PCBs, mitigate exposures based on site specific needs and conditions, and comply with the PCB regulations. Region 1's current focus is on providing technical support and regulatory oversight as Vermont schools identify and address risks from PCBs in indoor air. EPA Region 1 also continues to review and issue cleanup and disposal approvals to numerous additional private and public entities in New England. (b) (5)

LEAD OFFICE/REGION: LCRD/REGION 1

OTHER KEY OFFICES/REGIONS: OLEM/OCSP