



WHERE BUSINESS AND THE ENVIRONMENT CONVERGE



997 Millbury Street, Unit G, Worcester, MA 01607 tel 508.756.0151 fax 508.757.7063 www.ecsconsult.com

March 6, 2012

Ms. Kimberly Tisa, PCB Coordinator (OSRR07-2)
Remediation and Restoration II Branch
United States Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Re: Outreach Activities for the School
Community - PCB Risk-Based Cleanup
and Disposal
Thomas Prince School
Princeton, Massachusetts

Dear Ms. Tisa:

In response to condition 11 of the PCB Risk Based Cleanup and Disposal Approval Conditions for the Thomas Prince School in Princeton, MA (dated February 21, 2012), Environmental Compliance Services, Inc. (ECS), on behalf of the Town of Princeton, herein submits information on outreach activities for the school community on the PCB remediation work.

- August 25, 2011 – An initial School Committee Meeting was held at the Wachusett Regional High School in Holden, MA. The meeting was open to the public. The Superintendent of the Wachusett Regional School District (WRSD) and ECS provided information regarding the initial discovery of PCBs, follow-up assessment activities and comparison of findings to USEPA guidelines, temporary building use restrictions and student relocation plans. The Power Point presentation used at the meeting is attached.
- August 26, 2011 – A second public informational meeting was held by the Superintendent of WRSD to inform the community of the presence of PCBs at Thomas Prince School and of the actions being taken.
- August 29, 2011 – ECS and Triumvirate Environmental presented information at a public meeting of the Princeton Board of Selectman on the presence of PCBs at the Thomas Prince School.
- Approximate weekly updates on the progress of evaluating and remediating PCBs at Thomas Prince School are provided by the Princeton Town Administrator to the Princeton Board of Selectman at their public meeting, based on information provided by ECS and Triumvirate Environmental.
- Milestone reports and other documents that have been submitted to the USEPA are posted on the WRSD website at <http://www.wrsd.net/pcbinfo.cfm>. All documents are available for public download. The link to the PCB information is clearly highlighted in yellow on the homepage of the WRSD website. Links to the EPA PCB website, the

Massachusetts Department of Public Health and other resources website are also provided. Documentation of the contents of the website is attached.

- As part of the Monitoring and Maintenance Implementation Plan (MMIP) required for the long term monitoring of the applied epoxy surface coatings and indoor air, several criteria are required to be performed that relate to the school community outreach. These items include, but are not necessarily limited to, the following activities that will be implemented as required for the MMIP:
 - 1) A communications component will be implemented that will detail how the maintenance and monitoring results will be communicated to the users of the school, including teachers, parents, students, on-site workers and other interested stakeholders. At this time it is expected that the required information will be posted on the WRSD website for public access and provided at the school in a binder located in the general office area;
 - 2) A worker training component for maintenance workers or for any person that will be conducting work that could impact the barriers encapsulating the PCB contaminated surfaces will be implemented. Training of school custodial and faculty staff and other workers that could potentially impact the barriers will be performed prior to occupation of the rooms.

Should you have any questions regarding the above, please contact me at 508-756-0151 (O) or 774-272-2212 (M).

Sincerely,

Environmental Compliance Services, Inc.



Charles E. Klingler
Worcester Branch Manager

Attach

Cc: John Lebeaux, Town of Princeton
Peter Brennan, WRSD

ATTACHMENT 1



Thomas Prince School

170 Sterling Road
Princeton, MA 01541

PCB Mitigative Measures

Environmental Compliance Services, Inc.

997 Millbury Street, Unit G
Worcester, MA 01607

Chuck Klingler, LSP, LEP
Page Fallon, Ph.D.
Robert Palermo, Sc.D., PE, LSP, RPIH, CSP



Overview

- Background information regarding PCB's
- Extent of PCB presence at TPS
- Occupancy plan
- Educational plan

Talking Points

- Historical Use
- Health Effects
- Discovery of PCBs in Caulking
- Sampling Results (Air and Wipe Samples)
- Proposed Mitigation Plan with EPA Oversight

Historical Use

- Man made chemical ... widely used in plasticizers, caulking, sealant, adhesives, paints, dielectric fluids, etc.
- Congress banned use in 1976 with phase out in 1978
- Present in caulking, glazing, light ballast, mastic in Thomas Prince school
- PCB migrate from caulking into air, dust, soil and surroundings

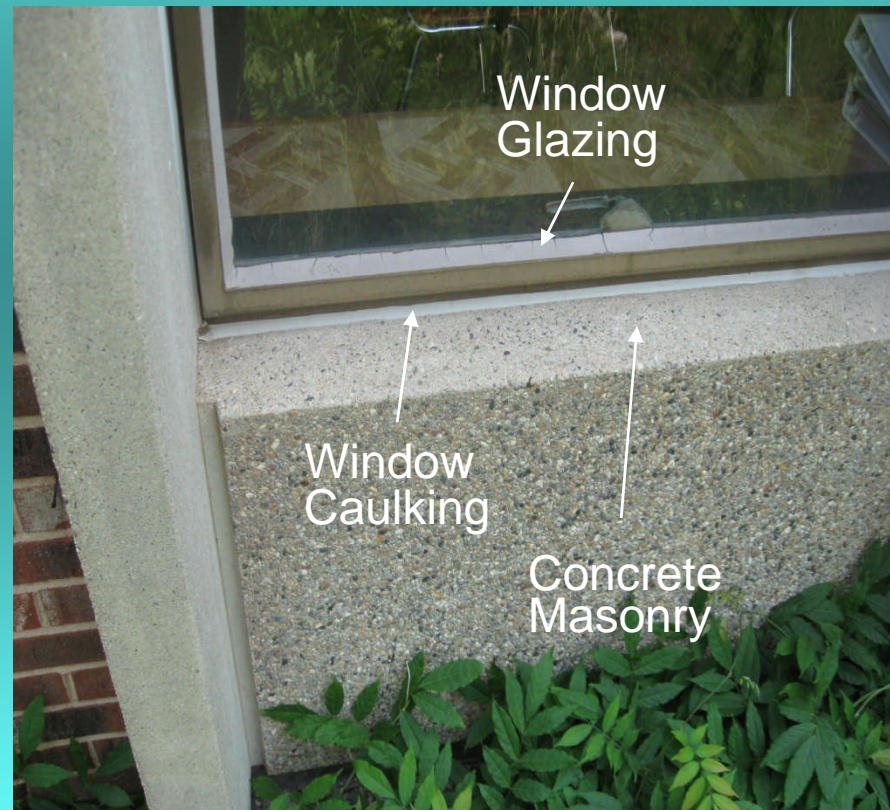
PCB Health Effects

- People are exposed by their diets, air and dust levels in older buildings
- Exposure Routes: Inhalation, skin absorption, ingestion and skin and eye contact
- Target Organ Effects: Liver, Immune System (decrease in antibodies), Reproductive (reduced BW and BR), Neurological (deficits in development), Endocrine (changes in hormone levels)
- Animal and epidemiological studies indicate PCB are a probable human carcinogen

Discovery of PCBs at Thomas Prince School

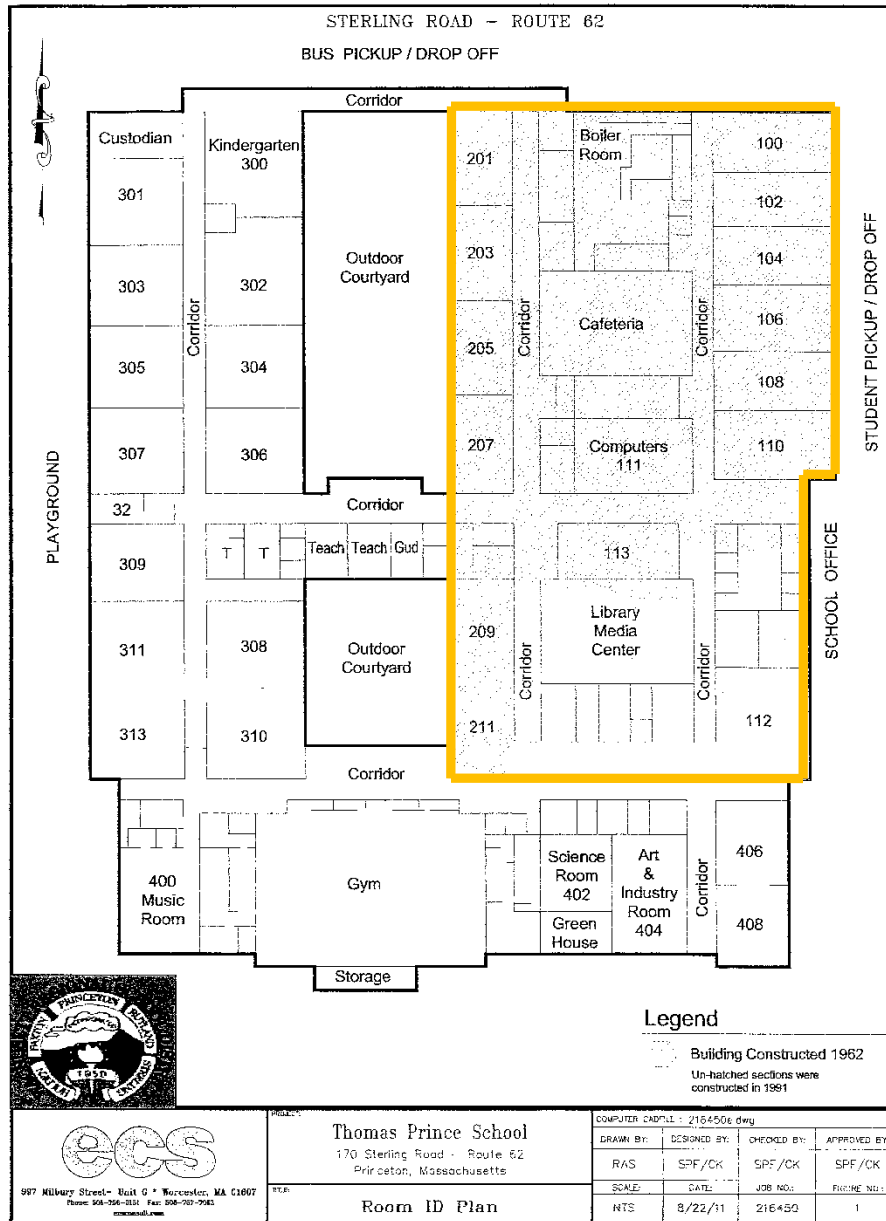
- As part of the MA Green Repair Program school windows are being replaced
 - Interior Caulking = 105 -173 ppm
 - Exterior Caulking = 115 - 6,850 ppm
 - Glazing Sealants = 915 ppm
 - Concrete/Masonry = 0.111 - 4.720 ppm

Typical First Floor Window



Regulatory Climate

- Regulated by EPA under TSCA 40 CFR 761
- Caulking > 50 ppm is unauthorized use
- EPA public health levels for PCBs in Indoor Air of 300 ng/m³ (Age 6-12 years)



Occupancy Plan

- Restrict access to the "older" classrooms until cleaning and further testing are performed
- Common areas ... cafeteria/kitchen, computer Rm., Rm. 113 and library will be restricted until cleaning and further testing are performed
- A "pilot test" will be performed on Rms. 209 and 106 to evaluate the ability to reduce indoor air concentrations through cleaning
- Furniture and teaching materials from 100-200 classrooms will be cleaned, removed, tested and reused in others areas of the school
- Lighting ballasts will be inspected and replaced as appropriate throughout the "older" building

Plan Going Forward

- Ongoing Air Monitoring
- Working with EPA to Reopen Restricted Classrooms
- Implement EPA's recommended BMPs

Educational Plan

- Grades 3-5 and Developmental Classroom will be moved to Glenwood Elementary
 - Six classrooms on the lower level will be used for regular education
 - Seventh classroom on the main level will be used for Developmental Classroom
 - Current resource room will be moved to a conference room
 - Psychological testing/counseling and Speech Pathology will be housed in current PTO space

Transportation Plan

- TPS students will be transported to TPS on regular bus routes
- 3rd, 4th, and 5th grade students will be transported to Glenwood by bus arriving by 8:45 a.m. (approximately 10 minutes before Glenwood students)
- Buses will drive to rear of school and entry will be through rear door adjacent to pod area
- At dismissal, TPS students will board buses through same door approximately 15 minutes before Glenwood dismissal
- Transportation to Glenwood will be available for School Choice students

Afterschool Programs

- Glenwood afterschool program will have approximately 25 slots for TPS students

Provisions for TPS

K-2 and 6-8

- All students located in newer section of the building
- Bag lunches will be prepared in Sterling and brought to TPS
- Common areas in older section cleaned and reevaluated before re-occupancy

ATTACHMENT 2



Our mission is to provide excellence in teaching, learning, and social development so that all students can realize their highest potential as responsible and productive citizens.

[District Budget Website](#)

[Thomas Prince School PCB Information Page](#)

Important District Links

[Full-Day Kindergarten Information](#)

[Online Tuition Payments](#)

[Wachusett Regional School District Bullying Prevention and Intervention Plan](#)

[Department of Elementary and Secondary Education Coordinated Program Review](#)

[Wachusett Regional School District Strategic Plan](#)

[AHERA Management Plan](#)

[School Calendar 2011-2012](#)

[Starting/Closing Times 2011-2012](#)
[Kindergarten Half-Day Starting/Dismissal Times 2011-2012](#)

[School Calendar 2012-2013](#)

Free Public Online Access

The Wachusett Regional School District posts information online. If you do not have access to online information, this document provides a list of free public online access locations.

FRAUD HOTLINE
(508) 829-1670, extension 281

Last updated: January 24, 2012

Upcoming Events

Mar 12, 2012 7:00 PM
[School Committee meeting](#)

Mar 26, 2012 7:00 PM
[Annual Budget Hearing](#)
[School Committee meeting](#)



Thomas Prince PCB Information

Please return to this page for updated information regarding the Thomas Prince PCB mitigation project. All information related to the ongoing work at TPS as well as updated school and transportation plans will be posted here.

Last updated: Tuesday, March 6, 2012

Updated Cleanup and Disposal Plan Documentation

Feb 10, 2012 - EPA Comments on initial PCB Cleanup and Disposal Plan

Feb 13, 2012 - ECS Response to EPA comments

Feb 13, 2012 - Revision 1 of the Risk Based Site Cleanup and Disposal Plan

Feb 21, 2012 - Letter of Approval from EPA

Feb 29, 2012 - Post Abatement Air and Surface Wipe Sample Locations letter
(in response to item 14c of the EPA Approval letter)

Revised Contractor Work Plan from Triumverate

Risk Based Site Cleanup and Disposal Plan and Assessment Report

The following report was provided by ECS on January 18th 2012. Please be advised that this document is 1,000 pages long and its file size is over 80MB. The download process may be lengthy, depending on your internet connection speed.

[Download Full Report](#)

Air Testing Results for Reopened areas

Afternoon Bus Routes

Principal's Letter to TPS Parents - Grades 3-5
Thomas Prince Fact Sheet
Glenwood Fact Sheet

EPA Resources	Other Resources	Thomas Prince Information
<p>Fact Sheet for Schools</p> <p>Basic Information</p> <p>Health Effects</p> <p>Caulk Removal</p>	<p>Toxicology Fact Sheet US Dept. of Health and Human Services</p> <p>Information Booklet MA Dept. of Public Health</p>	<p>Air Sample Results</p> <p>Air Sample Ranges</p> <p>Access Restriction Plan</p> <p>All samples collected by ECS 8/1/11 & 8/20/11</p>

November 22, 2011
PCB Mitigation Update

The two classrooms that were designated as pilot sites in order to establish an effective method to reduce PCB levels at Thomas Prince have now been tested and are well within the acceptable limit of 300 nanograms per cubic meter. The most recent test showed 179 nanograms per cubic meter in the second pilot room. At this point, Environmental Consultant Services, Inc., which is Princeton's consultant, will file a report with the EPA and seek authorization to clean the remaining six contaminated classrooms using the same methodology that has proven successful in the pilot rooms. Once cleaned, we will proceed with further air testing which will pave the way to occupation of these rooms.

Tom Pandiscio
Superintendent of Schools

PowerPoint Presentation Shown at
School Committee Meeting 8/25/11

Wachusett Regional School District

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Dr. Thomas Pandiscio, Superintendent