

February 4, 2011

Dear Worcester Public School Staff,

On January 20, 2011, I spoke to the School Committee about PCBs in building materials in Worcester Schools. The next day, the *Telegram & Gazette* carried an article about PCBs in the schools, and included statements by officials of the Worcester Public Schools and the Mayor. On January 24, 2011, Supt. Boone sent a letter to parents and staff in response to the *Telegram & Gazette* article. We think Dr. Boone's letter needs a response, particularly about three issues.

Health effects of PCBs

Dr. Boone's letter states that, "PCBs can affect the immune, reproductive, nervous and endocrine systems, and are potentially cancer-causing if they build up in the body over long periods of time." Although this is an accurate paraphrase of information from the Environmental Protection Agency (EPA), the EAW believes it does not tell the whole story, nor did Dr. Boone's letter provide any resources for further information. EPA has summarized its findings with respect to the health effects of exposures to PCBs in a fact sheet, *Health Effects of PCBs*. In that fact sheet, EPA considers each identified health effect of PCBs in some detail. Concerning cancer, the fact sheet provides the following summary:

EPA's peer reviewed cancer reassessment concluded that PCBs are probable human carcinogens. EPA is not alone in its conclusions regarding PCBs. The International Agency for Research on Cancer has declared PCBs to be probably carcinogenic to humans. The National Toxicology Program has stated that it is reasonable to conclude that PCBs are carcinogenic in humans. The National Institute for Occupational Safety and Health has determined that PCBs are a potential occupational carcinogen.

The fact sheet also provides information about the medical/scientific understanding of PCBs' immune effects, reproductive effects, neurological effects, endocrine effects, and other non-cancer effects. We believe this fact sheet provides a better source of information about the connection between exposure to PCBs and health than does Dr. Boone's paraphrase. You can find EPA's *Health Effects of PCBs* fact sheet at <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/effects.htm>. We urge you to review EPA's information about the health effects of PCBs for yourself.

The condition of caulking and other building materials in Worcester Schools

Dr. Boone's letter states that, "Just because PCBs exist in caulking material does not mean that exposure and health impacts are likely. If the caulking is intact, no appreciable exposure to PCBs are [sic] likely and hence health effects would not be expected." The implication of these two sentences is that caulking in Worcester schools is intact, and offers no risk of exposure to PCBs. It is simply untrue that caulking at Burncoat, North and Doherty High Schools is intact.

In the Fall, Mike Sireci, EAW's Executive Secretary and EAW building reps from those schools, toured the buildings and took photographs of the condition of caulking in the buildings. Some of their photos are posted on EAW's website. You can see that the photos demonstrate that caulking in these buildings is NOT intact. We think the Superintendent's letter at best is misleading on the condition of

caulking in these schools, and at worst is a deliberate effort to hide from parents and staff the deteriorated condition of caulking, and the potential for PCB exposures to students and staff.

The EAW has requested more than once that WPS conduct a full inspection of the condition of caulking in its schools built between 1950 and 1978, and then, consistent with EPA guidelines, conduct appropriate testing, and implement a comprehensive maintenance plan for caulking. Thus far, the school district has chosen not to agree to those requests.

WPS's Environmental Management System

Supt. Boone's letter describes the school district's efforts in developing a comprehensive Environmental Management System whose purpose is to "proactively, effectively and properly identify and manage all environmental issues that may exist within our buildings." The EAW vigorously supports the implementation of an Environmental Management System in Worcester schools. However, we believe it is disingenuous for Dr. Boone to describe this as a "proactive" effort to address all environmental problems, including PCBs. The Environmental Management System was part of a Settlement Agreement between the state Attorney General's office and the City of Worcester. The Attorney General and the City entered into the Settlement Agreement after the state Dept. of Environmental Protection found that Worcester Public Schools had violated the Asbestos Hazard Emergency Response Act (AHERA) by improperly abating and disposing of asbestos-containing material at the Vernon Hill School. In order to avoid fines and further action by the Attorney General's office, Worcester Public Schools agreed to develop and implement an Environmental Management System.

Dr. Boone's assertion that EPA's guidelines for PCBs will be part of the Environmental Management System is a new development, and is welcome news to the EAW. During the fall of 2010, the EAW met with representatives of the school department and asked that the Environmental Management System include a comprehensive protocol for PCBs, consistent with EPA guidance. At the time of our last meeting in November, WPS was unwilling to make that commitment. We are glad to see that WPS has changed its mind on this issue.

The EAW requested a copy of the current working draft of the Environmental Management System from Supt. Boone, in order to understand what would be included in the document. We have not yet received a response to our request.

The EAW will continue to be involved in the PCB issue in Worcester schools, and will continue to keep you informed of any developments. Please contact us at the EAW (508-791-3296) if you have any questions.

Sincerely,

Len Zalauskas, President

