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Superintendents of schools
BOCES District Superintendents

September 15, 2011

SUBJECT: PCB-Containing Fluorescent
Lighting ballasts

This letter is to inform school administrators about important environmental, health, and safety information regarding certain fluorescent light fixtures, and to recommend the inventory of all lighting fixtures in schools built or renovated before 1980. It is strongly recommended that a plan be developed to replace all lighting fixtures identified as containing PCBs.

In December of 2010, the U.S. Environmental Protection Agency (EPA) released guidance recommending schools take steps to reduce potential exposures to polychlorinated biphenyls (PCBs) from older fluorescent lighting fixtures. The guidance is based on evidence that older ballasts contain PCBs that can leak when the ballasts fail, leading to elevated levels of PCBs in the air. Elevated levels should not represent an immediate threat but could pose health concerns if the elevated levels persist over time. If light ballasts are leaking PCBs, federal law requires immediate removal and disposal of the ballasts and any PCB containing material at an EPA approved facility. PCBs should be removed by trained professionals using protective equipment and proper disposal procedures.

EPA guidance documents and additional information on PCB's can be found at the following locations:

<http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/ballasts.htm>
<http://www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm>

PCBs were extensively used in fluorescent light ballasts and other electrical devices due to their insulating properties until they were banned in the United States in 1978. Light fixtures containing PCB ballasts were distributed until about 1980. More information can be found in the facilities planning newsletter from May, 2011, available at:

http://www.p12.nysed.gov/facplan/Newsletter/Newsletter_106.htm

The EPA has worked with the New York City School system to conduct a pilot study and found that many light ballasts in the schools contained PCBs and that many ballasts had failed, allowing PCBs to leak out. Elevated PCB levels were discovered in many of these schools.

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Some districts undertook projects that upgraded lamps and ballasts only, and did not replace entire light fixtures. These districts should inspect those fixtures to determine whether any previously leaked material was properly removed from the fixture itself.

The replacement or cleanup of ballasts are considered routine maintenance activities and are not eligible for state building aid, and do not require a building permit from this office. However, if the replacement or cleanup of ballasts is part of a larger school facilities project with a broader scope, or part of a complete lighting upgrade, the work will require a building permit and will be eligible for appropriate state reimbursement. There are also other opportunities available to help fund replacement of lighting fixtures. Utility companies offer energy efficiency programs that can replace outdated fixtures with higher efficiency units and state authorities such as the New York Power Authority (NYPA), the New York State Energy Research and Development Authority (NYSERDA), and the Long Island Power Authority (LIPA) have programs available to assist with the funding, financing, and replacement of fixtures.

Lighting technology and efficiency have improved dramatically in recent years, and replacing old ballasts and lighting with new energy efficient lighting systems will provide a savings in energy costs while also removing hazardous materials from your schools. The work can be undertaken through maintenance activities, a capital program, or through an energy performance project. The department analyzed building condition survey data to attempt to identify schools that may still have PCB containing lighting fixtures and we have reached out to facilities directors to inquire of those specific locations.

Please review the information in the links provided above, speak with your facilities personnel, and contact your project manager at facilities planning, your utility provider, or NYPA to begin discussions. NYPA can help perform the actual work and will coordinate with other entities like NYSERDA to ensure receipt of all grants and rebates the work is eligible for. You can contact NYPA by calling Ms. Maribel Cruz at (914)390-8228.

Lighting improvements can eliminate PCB hazards from school, improve your learning environment, and reduce your local energy and capital costs and we encourage you to take advantage of the available opportunities as soon as possible.

Sincerely,



Carl T. Thurnau, PE
Director

