



Burlington High School Update – VTDEC and USEPA Coordination

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Agenda

- Introductions
- Project Review and Update
- Site History
- Regulatory Overview
- Project Challenges
- Coordination
- Lessons Learned
- Comments or Questions

Project Background



Burlington High School and Technical Center
52 Institute Road
Burlington, VT 05408

- Site Description
 - Buildings A-E (Original Campus) - 1964
 - Building F Addition - 1965
 - Building G - Post 1985
 - Wood Chip Plant 2002
 - ~245,000 ft²
 - 2019 Re-Envisioning Plan was Impetus of Sampling.

EPA, VT DOH, VT DEC & BSD Collaboration

- Burlington School District Notified VTDEC and EPA of PCB Findings on August 17, 2020
- Notification Included:
 - *Interior and Exterior Building Products Containing PCBs >50 ppm (Unauthorized Use)*
 - *Soils Containing PCBs >50 ppm for EPA & >0.114 ppm VTDEC RSS*
 - *Substrate Impacts >1 ppm EPA Cleanup Criteria for High Occupancy Usage*
 - *PAHs and Arsenic above VT Soil Standards*
- August 19th – Agencies Request IA Sampling. Still working through regulatory authority.
- September 1-9, 2020 - Work Plan approved, sampling conducted, and preliminary data received (results ND-6,300 ng/m³).
- September 10, 2020 – All classes go remote (again).
- March 2021 – Students in Person at Downtown BHS (Former Macy's)



Site Characterization & Stakeholder Coordination

- DEC, Health & EPA worked with QEPs to inform sampling work plans, etc.
 - TSCA Compliant Soil Assessment
 - Separate reports/QEPs for building materials and soils
- Sampling included 1,033 Building Material Samples
 - 803 bulk (ND-275,000PPM)
 - 230 substrate (ND-820PPM)
- Weekly coordination meetings held with BSD, VTDEC, EPA, and Fuss & O'Neill to Inform CAP
- Multiple Internal Weekly Meetings with Agencies (Policy)
- Initial Corrective Action and Self Implementing Plan
 - Amended to a Risk Based Disposal Plan
 - Based on waste characterization sampling requirements

Summary of PCB Bulk Products

Location	Concentration (ppm)
A-E Buildings	
Exterior Window Caulking	52 – 34,000
Interior Caulking	59 – 1,800
Exterior Expansion Joint Caulking	62
Burlington Tech Center - F Building	
Exterior Window Caulking	3,000 – 163,000
Exterior Window Glazing	203
Interior Caulking	144,000 – 158,000
Exterior Door Caulking	96,000 – 163,000
Interior Door Caulking	162,000
Exterior Expansion Joint Caulking	198,000

Project Review and Update

- CAP/RBDP approved by VTDEC and EPA on December 22, 2022
- Present day - Building A demolished and Building B started this week
- Substantial completion of abatement, demo, and remediation anticipated October 2023
- New school construction to be completed concurrent with building demolition and remediation

Project Challenges

- Regulatory oversight by VTDEC, VTDOH, and USEPA Region 1- Who Has Authority?
- Fast-paced construction schedule and procurement deadlines
- New school promised to Burlington community by January 2025
- COVID-19 challenges with coordination, field work, and site access
- Commingled asbestos and PCB containing building materials
- Public perception and stakeholder concerns
- Changes to overall design and client
- Additional asbestos containing materials identified during the abatement and demolition process

Design and Remediation Coordination Items

- Painted structural steel disposal/recycling
- Hydro blasting wastewater treatment and disposal
- Trucking for large volume of materials
- Dust mitigation and stormwater management
- Public perception and outreach activities
- Controlled demolition of each building

Regulatory Coordination and Reporting cont.

- Corrective Action activities required the following reports given the fast-paced project approach and delay in final design.
 - Corrective Action and Risk Based On-Site Cleanup and Disposal Plan
 - Corrective Action and Risk Based On-Site Cleanup and Disposal Plan - Amendment
 - Soil Management Plan

Protective Measures

- Environmental professional on site at all times to observe work practices
- Downwind real time dust monitoring is performed to protect from dust migrating from the site and to actively monitor site conditions. Coordinated with VTDEC.
- Dust mitigation measures including wetting of work areas, proper maintenance of material stockpiles, and removal of soil from haul/access roads.
- A truck wash station is used for all trucks leaving the site
- Site security measures and control
- Traffic control – the site is adjacent to a school and a popular beach location on Lake Champlain

Lessons Learned

- Remedial planning thoroughness and coordinated effort with VTDEC/EPA was critical
- Specifications and bid documents critical to ensure contractor understanding of project details and regulations
- Defining waste streams and pre-characterizing waste to expedite project schedule
- Civil, structural, and MEP as-built review of building components was critical
- Communication between project team, consultant/engineers, and regulators critical to project

Questions or Comments?

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