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June 1, 2011

TO: Chief School Administrators
School Business Administrators

FROM: Bernard E. Piaia, Jr. Bernard E. Piaia Jr.
Director, Office of School Facilities

SUBJECT: PCB-Containing Fluorescent Lights in Schools

The purpose of this memorandum is to provide school districts with important environmental, health and safety information regarding certain fluorescent light fixtures.

The federal Environmental Protection Agency (EPA) recently 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 the older ballasts contain PCBs that can leak when the ballasts fail, leading to elevated levels of PCBs in the air of schools. That should not represent an immediate threat but could pose health concerns if the elevated levels persist over time.

A recent pilot study of three schools in New York City found that many light ballasts in the schools contained PCBs and had also failed, causing the PCBs to leak and contributing to increased levels in the air that the students and teachers breathe. EPA has also worked with school officials to address leaking PCBs in light ballasts in schools in Oregon, North Dakota and Massachusetts. It was also discovered that in some cases, old leaking ballasts had been replaced, but the new ballasts were installed in contaminated fixtures that had not been cleansed of the leaked material. The federal EPA guidance documents and related press release may be found at the following:

http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/ballasts.htm
http://www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm
http://yosemite.epa.gov/opa/admpress.nsf/e77fdd4f5afd88a3852576b3005a604f/6c03fdec1e6327 4c8525780800693d7d!OpenDocument.

PCBs were used in fluorescent light ballasts 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.

The Department of Education recommends that school districts, as part of their ongoing efforts to maintain their facilities, survey and inventory all light fixtures in schools built before 1979 and develop a plan to replace those identified to contain PCBs in the ballasts. In addition, school districts should inspect those ballasts that have been replaced to determine whether any leaked material has been properly removed. If a light ballast is leaking PCBs, federal law requires the immediate removal and disposal of the PCB containing ballasts and disposal of any PCB containing material at an EPA approved facility. Information regarding disposal can be found at http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/ballastchart.pdf. In addition the school district can contact the USEPA's Toxic Substances Control Act (TSCA) information call center at (202) 554-1404 should they require additional clarification on removal, handling or disposal requirements. The New Jersey Department of Environmental Protection (DEP) is also available to assist in explaining USEPA's Guidance documents and disposal requirements including USDOT transportation requirements. For DEP assistance please call Michael Hastry, Chief - Hazardous Waste Enforcement at (609) 943-3019. Although intact, functioning ballasts do not pose a health risk, postponing lighting retrofit may result in future health and educational impacts for students and staff.

The replacement or cleanup of ballasts are considered routine or required maintenance activities by the school district. As such, they do not require an approval from the Department of Education as a school facilities project. However, if the replacement or cleanup of ballasts is part of a school facilities project with a broader scope, The Department of Education suggests the school district contacts the Office of School Facilities to determine if project approval is required. Per Department of Education regulations, State funding is not available for routine or required maintenance. The Department suggests the school district inquire with the Office of School Facilities when such work is part of a larger scope to determine if funding is available. Replacing old ballasts with new energy efficient lighting systems will provide a savings in energy costs.

The replacement of light ballasts does not require a permit from the Department of Community Affairs.

Personnel responsible for work in which they may come in contact with PCBs need to be properly trained. They must receive appropriate training about the potential hazards of PCBs and how to mitigate exposure. For more information about worker safety, see http://www.state.nj.us/health/eoh/rtkweb/. For questions regarding indoor air quality, please contact the Department of Health and Senior Services, Indoor Environments Program at (609) 826-4920.

Please contact Bernard Piaia, Director, Office of School Facilities, at (609) 943-5351 or Len Colner at (609) 943-5926 with any questions on this issue.

C: Executive County Superintendents
Office of School Facilities Staff

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