

**NEW YORK CITY DEPARTMENT OF EDUCATION
DIVISION OF SCHOOL FACILITIES
OFFICE OF BUILDING SERVICES**

May 3, 2012

OFFICE OF BUILDING SERVICES CIRCULAR NO. 06 - 2011/12

NOTE: All Circulars are to be kept in a permanent file

TO ALL CUSTODIAN ENGINEERS AND BUILDING MANAGERS

**BEST MANAGEMENT PRACTICES FOR
PCB CAULK IN NEW YORK CITY SCHOOL BUILDINGS**

This Circular supersedes Circular # 5 of 2007/08 and its purpose is to outline the most effective strategies for managing PCB caulk that may be located in our public school buildings. Excerpts in this circular are taken directly from Best Management Practices jointly established with the DOE and SCA and approved by the EPA. The entire BMPs can be accessed through the DSF website at

<http://www.opt-osfns.org/dsf/Custodian/CustodianResources.aspx>

Custodian Engineers/Building Managers (“CEs/BMs”) are responsible for reviewing and becoming familiar with the BMPs as soon as practical, including reading any and all directives from DSF Administrators related to the BMPs. Thereafter, CEs/BMs are instructed to review the BMPs as part of their annual school opening protocols, and contact DSF Administration if they have any questions. CEs/BMs are also responsible for making their staff familiar with the BMPs, to the extent that the BMPs relate to that staff member’s responsibilities. The protocols outlined in these BMPs shall be followed until they are superseded by new protocols or until January 19, 2020.

The BMP Protocols address many facets of control measures in schools built between 1950 and 1978. The BMP Protocols will guide school custodial staff in properly implementing current BMPs regarding caulk inspections, maintenance of caulk, general cleaning procedures, and maintenance and cleaning of ventilation systems; including optimization of air circulation by proper, efficient operation of HVAC equipment in accordance with the design and intended use (record daily hours of operation on the monthly PO7 which is included in the BMPs), caulk disposal, communication and training on how to reduce potential exposure to PCBs.

CEs/BMs and staff are responsible for operating and maintaining the buildings’ mechanical systems and cleaning activities in accordance with the Collective Bargaining Agreement (“CBA”). The Master List of Minimum Responsibilities is contained in Appendix F of the CBA. A complete version of the CBA is available at http://www.opt-osfns.org/dsf/forms/custodial_contract_2002thru2007.pdf.

Under the CBA, CEs/BMs are responsible for, in relevant part:

- Conducting daily inspections of school buildings;
- Designing and implementing maintenance/management programs;
- Maintaining the entire building in a neat, clean and orderly condition at all times;
- Preparing reports which document the building’s condition;
- Operating, regulating, cleaning and maintaining the heating and ventilating systems;
- Inspecting, overhauling and repairing the heating and ventilating systems;
- Requesting services of specialists to repair heating and ventilation systems where required; and
- Cleaning all ducts, radiators, univents, and ventilating registers as necessary.

Activities of CEs/BMs under these BMPs include:

- Cleaning school consistent with the methods set forth in EPA guidance documents on PCB caulk;
- Visually inspecting caulk;
- Inspecting and maintaining ventilation systems, and initiating priority work order requests to repair ventilation systems as necessary;
- Requesting the DSF Environmental Health and Safety Unit to perform interior caulk patch, repair, encapsulation and/or removal and caulk disposal;

- Recordkeeping

➤ **Caulk Inspections**

PCB caulk will be addressed using the following operation and maintenance (O&M) protocols. CEs/BMs or their designees will perform quarterly inspections of interior caulk using the inspection forms contained in Appendix “C” of the BMPs and also available on the DSF website at <http://www.opt-osfns.org/dsf/Custodian/CustodianResources.aspx>. The first quarterly inspection will be performed prior to school opening in September. The inspection notes any area where caulk is visibly peeling, cracking, brittle, or deteriorating. Pictures showing examples of deteriorated caulk are also included in Appendix “C” and can be found on the DSF website at <http://www.opt-osfns.org/dsf/Custodian/CustodianResources.aspx>. The inspection shall also note any areas where it appears caulk has been tampered with in an unauthorized manner. Inspection records will be maintained by the CEs/BMs in permanent files retained in the CEs/BMs’ office. These forms will be available for inspection by representatives of the DOE, as well as other authorized personnel from EPA and remain in the file at the specific school location as described in Section 8.0., upon the transfer of any individual CE or BM. If visibly peeling, cracking, brittle or deteriorating caulk is identified, CE/BMs must immediately contact DSF EHS Unit.

➤ **Cleaning**

To effectuate these BMPs, CEs/BMs are hereby instructed to review their existing cleaning practices to ensure that they conform to the cleaning techniques discussed below and, if not, to make any necessary modifications.

Principals’ and Deputy Directors of Facilities oversight of Custodial Operations will include an evaluation of whether the CE/BM is effectively minimizing dust. If the inspection identifies insufficient dust minimization practices, DSF shall instruct the CE/BM in writing to modify their cleaning protocols accordingly and if the need be, the principal will modify the annual performance plan.

As way of background, in a guidance document entitled “Current Best Practices for PCBs in Caulk Fact Sheet – Interim Measures for Assessing Risk and Taking Action to Reduce Exposures” (Sept. 2009), EPA states that “[d]isintegrating caulk may ... shed dust that can contaminate window sills and other nearby surfaces.”

The current specifications for cleaning school buildings are contained in Section 1 of Appendix “F” of the CBA. Section 1 sets forth the detailed existing protocols for cleaning lobbies, elevators, washrooms, classrooms, and service spaces and requires that the CE/BM “maintain the highest level of custodial service from a cleaning standpoint.” In addition to these specifications, the CBA also requires the principal and custodian to agree to a building-specific plan which outlines the CE/BM’s duties consistent with the available funding provided to the CEs/BMs. Each year, the principal evaluates the CE/BM to ensure adherence to this building specific-plan.

In September 2009, EPA recommended basic cleaning techniques to minimize potential exposures to PCBs in dust, including cleaning frequently to reduce dust and residue inside buildings; using a wet or damp cloth or mop to clean surfaces; using vacuums with high-efficiency particulate air (HEPA) filters; refraining from sweeping with dry brooms; minimizing the use of dusters.

To ensure that dust is being minimized throughout the school building, the CEs/BMs shall confirm that their existing practices contain the following cleaning techniques:

- Routine washing and/or wiping with a dampened cloth of all accessible horizontal and vertical surfaces, in order to reduce the amount of dust that becomes airborne due to cleaning. This includes, but is not limited to, walls, chalk boards and troughs, door frames, door knobs, furniture, fixtures, window sills, radiator/convactor covers, venetian blinds, other window treatments, ventilating louvers and registers, and accessible portions of ducts;
- Routine cleaning of hard flooring (wood, vinyl tile, or painted/sealed concrete) using dust mops treated with either water based additives or an oil treatment comprised of silicone or paraffin and spot mop areas as necessary.
- Routine vacuuming of carpeting or rugs.
- Routine brushing and cleaning of radiator sections and areas beneath each radiator/convactor.
- Cleaning the interior of all waste receptacles with dampened wipe cloths, and washing as necessary.
- Cleaning each univent cabinet on the outside and inside as necessary, including cleaning and oiling motor bearings, cleaning motor fans, water pan, and dampers.

- Washing all mirrors, powder shelves, bright work and enameled surfaces in all lavatories, as well as sinks, commodes and urinals.
- Washing/wiping with dampened cloths or sponges, all tile and painted wall surfaces.
- Routine mopping and machine scrubbing all ceramic flooring.

➤ **Cleaning in Areas Where Significantly Deteriorated Caulk Has Been Identified During a Caulk Inspection**

In the event that a quarterly caulk inspection identifies significantly deteriorated caulk (i.e., loose, visibly flaking or dusting onto adjacent areas), the CE/BM shall implement the following temporary cleaning protocols until the remedial work described in this section is implemented by EHS. These precautionary measures shall be taken in order to prevent against the accidental spread of any deteriorated caulk.

- The CE/BM and/or custodial staff will only use a vacuum with HEPA filtration in the room or general area where the significantly deteriorated caulk has been identified. The CE/BM may contact DSF if he or she needs temporary access to a vacuum with HEPA filtration. If vacuuming in these areas, the CE/BM and/or custodial staff should wear basic personal protective equipment (e.g., gloves, coveralls, etc) sufficient to prevent carrying any deteriorated caulk into other areas of the building on normal work clothing. In addition, hand washing with soap and water is recommended after cleaning activities.
- The CE/BM should refrain from mopping or dusting within the immediate area of the significantly deteriorated caulk. For instance, if the significantly deteriorated caulk is identified on a window frame, the CE/BM should refrain from dusting the area immediately beneath the window. If the significantly deteriorated caulk has flaked onto the floor, the CE/BM should refrain from mopping that portion of the floor and should instead, use a HEPA filtered vacuum to remove any particles, pieces, dust, or residue.
- The CE/BM should contact DSF if the CE/BM has any questions about whether significantly deteriorated caulk is present, or what cleaning measures to implement if there is significantly deteriorated caulk present. DSF, in coordination with EHS, shall promptly consult with the CE/BM on such issues to provide appropriate guidance prior to the repair, removal, or encapsulation of the material by an EHS contractor.
- DSF, in consultation with EPA, may install a temporary barrier (e.g. metallic tape) to cover deteriorated caulk prior to its repair, removal, or encapsulation. Unless authorized in writing by EPA, the temporary barrier shall be used for no longer than two weeks after the deteriorated caulk is first identified. When applying the metallic tape, the CE/BM or custodial staff member should also utilize basic personal protective equipment to prevent carrying deteriorated caulk to other areas on normal work clothing.

CE/BMs must clean, adjust, and maintain HVAC equipment in accordance with the requirements of the Department. If they cannot rectify a problem, a work request must be submitted through Passport as a Priority 4, with an email notification to the Deputy Director of Facilities.

➤ **HVAC Cleaning duties of CE/BMs include:**

- Operate, regulate, and maintain HVAC plants;
- Inspect, overhaul, and repair HVAC systems;
- Inspect and change filters, as necessary;
- Inspect, maintain, and clean cooling systems;
- Inspect, keep free from objects that obstruct air flow, and clean registers;
- Inspect and clean accessible ducts, as necessary;
- Adjust fresh air inlet dampers on supply fans or heating stacks;
- Inspect HVAC systems annually, including circuit breakers and belts;
- Inspect, lubricate, and clean fan motors.
- Clean univents on the outside and inside, as necessary. This includes cleaning and oiling motor bearings, cleaning motor fans, water pans, and dampers.

CE/BMs must log records of the performance of these requirements in the Custodial Maintenance Log book, which will remain on-site at each school, and record records of daily operation of ventilation systems on the PO7 form, which is retained in the CE/BM files.

Annual worker health and safety training (New York State Hazcom and New York State Right to Know) shall contain information advising CEs/BMs and other relevant staff on measures to reduce exposures to PCBs in the workplace. This information will include recommendations that employees wear gloves during cleaning and wiping activities and to wash their hands with soap and water after performing cleaning activities or before eating or drinking. Employees will also be encouraged to maximize ventilation while performing cleaning procedures.

➤ **Records Retention**

The following records related to the BMPs will be maintained by CEs/BMs on site until 10 years after the requirements of the CAFO have been met:

DOCUMENT	RETENTION LOCATION*
Quarterly and Annual Caulk Inspection	Records to be maintained on site in the file of the CE/BM
HVAC fan inspections	Inspections will be recorded in the CE/BM Maintenance log book and remain on site at each school
DSF Audits	Annual Summary Inspection Reports will be submitted by each CE/BM to DSF – EHS and retained on site in the CE/BM file.

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