



## **WOODBIDGE TOWNSHIP SCHOOL DISTRICT**

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**Joseph Massimino, Ed.D.**  
*Superintendent of Schools*

October 27, 2022

Dear Parents and Guardians,

As stated in my last letter, I remain committed to keeping our community informed of new information as it pertains to Colonia High School. Yesterday, the Mayor's Office and I received correspondence from Commissioner LaTourette of the New Jersey Department of Environmental Protection (NJDEP) and Commissioner Persichilli of the New Jersey Department of Health (NJDOH). I strongly encourage everyone to read the letter, which can be viewed below, or by visiting our district webpage under Superintendent Notifications.

As you will see, the Commissioners explained that:

Although the newly reported presence of PCBs and pesticides may require further environmental evaluation, it is not necessarily a cause for immediate alarm. The presence of PCBs and pesticides does not alter NJDEP's prior conclusions regarding the absence of known environmental conditions at Colonia High School that could potentially be related to the occurrence of primary brain tumors. PCBs and pesticides are not sources of the ionizing radiation most associated with the occurrence of primary brain tumors, nor would these materials have been detected during the previously conducted radiological survey.

The Commissioners further explained that "finding PCBs in materials used in buildings, including schools, built between 1950 and 1979 is not uncommon" and that "a single dust wipe sample does not represent an evaluation of indoor air or potential PCB exposure within the school building." Additionally, they said that "historically applied pesticides (HAPs) are commonly detected around building exteriors of this vintage." As a result of these considerations, the Commissioners recommended that the School District engage the services of a licensed site remediation professional (LSRP), who will "follow the applicable regulatory process, fully characterize the extent of soil impacts, and remediate the soils as appropriate." The district already hired an LSRP last week to facilitate these measures.

We will do everything we can to have the LSRP complete the work in as expeditious a manner as possible. Our environmental consultants and LSRP are in the process of working with representatives from the aforementioned agencies on finalizing the scope and nature of the necessary work to be done. As we receive more information, I will certainly keep the community updated.

Sincerely,

Joseph Massimino, Ed.D.



**NEW JERSEY  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION**



October 26, 2022

Honorable John E. McCormac, Mayor  
Woodbridge Township  
1 Main Street  
Woodbridge, NJ 07095

Dr. Joseph Massimino, Ed.D., Superintendent  
Woodbridge Township School District  
P.O. Box 428 School Street  
Woodbridge, NJ 0709

RE: Colonia High School  
NJDEP/NJDOH Review of Sampling Information  
presented by Woodbridge Township resident 10/17/22

Dear Mayor McCormac and Dr. Massimino,

Thank you for contacting the New Jersey Department of Environmental Protection (NJDEP) and Department of Health (NJDOH) on October 17, 2022, upon your receipt of new information from Ms. Edyta Komorek, a resident of Woodbridge Township, who reported the results of samples of environmental media she collected from discrete areas of the Colonia High School grounds in September 2022. These samples identified the presence of polychlorinated biphenyls (PCBs) and pesticides as described below. In furtherance of our commitment to the protection of public health, the Departments have taken Ms. Komorek's report seriously, reviewed the materials provided with the appropriate NJDEP and NJDOH expert teams and, by way of this letter, offer our observations and suggestions for further action by Woodbridge Township School District.

As you know, earlier this year, the Departments conducted reviews and analyses pertaining to concerns raised by some in the Colonia High School community regarding the occurrence of primary brain tumors. In May 2022, the NJDEP concluded that environmental evaluations at and in the vicinity of Colonia High School did not identify any source of ionizing radiation or relevant environmental exposures potentially related to the occurrence of primary brain tumors. Based on information available at that time, NJDEP did not recommend further environmental testing. Simultaneously, the NJDOH released a report that calculated the expected number of brain and other central nervous system (CNS) tumors among students and employees at Colonia High School based on the New Jersey state rates. Additionally, NJDOH released two data briefs that provide statistics on the incidence of benign and malignant brain and other CNS tumors among New Jersey residents and a health consultation that evaluated the potential health effects of a radioactive rock found in the school in 1997.

Following the issuance of these conclusions, Ms. Komorek collected a sample of exposed caulk present on an exterior wall of the school building, samples of soil along the exterior building wall immediately beneath the location of the exposed caulk, and a dust wipe sample in a first-floor bathroom. The results of the PCBs and pesticides analyses were reported to the Township and School District on October 17, 2022, who immediately shared the new information with the Departments.

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Department of Environmental Protection  
Shawn M. LaTourette, Commissioner  
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Trenton, NJ 08625-0402  
[www.nj.gov/dep](http://www.nj.gov/dep)

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Department of Health  
Judith M. Persichilli, Commissioner  
55 North Willow Street, P.O. Box 360  
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[www.nj.gov/health](http://www.nj.gov/health)



Although the newly reported presence of PCBs and pesticides may require further environmental evaluation, it is not necessarily a cause for immediate alarm. The presence of PCBs and pesticides does not alter NJDEP's prior conclusions regarding the absence of known environmental conditions at Colonia High School that could potentially be related to the occurrence of primary brain tumors. PCBs and pesticides are not sources of the ionizing radiation most associated with the occurrence of primary brain tumors, nor would these materials have been detected during the previously conducted radiological survey.

Please note that NJDEP reviewed only the sampling results reported by Ms. Komorek on October 17, 2022. NJDEP has not conducted sample analyses nor quality assurance evaluation of the data submitted by Ms. Komorek. The observations offered here assume that the samples were accurately collected and analyzed pursuant to applicable standards and practices.

### **PCBs in Caulk and Underlying Soil**

As reported by Ms. Komorek, laboratory analysis of the caulk sample detected a concentration of 50,500 milligrams per kilogram (mg/kg). The underlying soil sample detected a concentration of 575 mg/kg PCB as Aroclor 1254, exceeding the applicable NJDEP soil remediation standard.

It is important to note that PCBs are commonly detected in older building settings like Colonia High School, which was constructed in 1967. PCBs were in widespread use in building materials from the 1940s through the late 1970s. Caulk used during this period is known to have contained PCBs, primarily Aroclor 1254. While PCBs were banned in 1979, the continued presence of PCBs in building materials that predate 1979 is not unusual or unauthorized. NJDEP requires that PCBs in building materials be addressed at the time of building demolition to ensure that PCB-laden construction debris receives proper handling and disposal.

Similarly, due to the weathering of building exteriors, it is not uncommon to identify PCBs, which can extrude over time from building materials such as caulk and become located in soils immediately adjacent to building exteriors. In some instances, it may be appropriate to remediate soils that have become impacted by PCBs.

### **Pesticides in Soil**

As reported by Ms. Komorek, a soil sample was also collected at the exterior building location and analyzed for herbicides and pesticides. Results indicated non-detectable levels of herbicides and the presence of the pesticides chlordane, heptachlor, and heptachlor epoxide at concentrations of 113, 4.35, and 14.7 mg/kg, respectively, exceeding the applicable NJDEP soil remediation standards.

It is important to note that these historically applied pesticides (HAPs) are commonly detected around building exteriors of this vintage. The detection of HAPs in soil sampled immediately adjacent to the exterior of the school building is indicative of historical direct application of termiticides to the building foundation. The HAPs identified at Colonia High School were routinely applied to properties as termiticides at the time of the High School's construction in 1967. In some instances, it may be appropriate to remediate soils that have become impacted by HAPs.



### Potential PCBs in Dust

As it relates to PCBs and indoor air quality in schools, finding PCBs in materials used in buildings, including schools, built between 1950 and 1979 is not uncommon.

It is reported that a dust sample was collected from within a first-floor restroom using a sampling protocol whereby a 100 square centimeter surface was wiped using a hexane wetted gauze pad and submitted for PCB analysis. The result was indicated as 4.3 micrograms per 100 square centimeters (4.3  $\mu\text{g}/100\text{ cm}^2$ ). While New Jersey has no regulatory standard for PCB wipe sampling, the U.S. Environmental Protection Agency (USEPA) has established PCB decontamination criteria for non-porous indoor surfaces at 10 micrograms per 100 square centimeters (10  $\mu\text{g}/100\text{ cm}^2$ ) by standard commercial wipe tests pursuant to 40 CFR § 761.125(b)(1). The sample result from the first-floor bathroom was reported at less than half of this USEPA decontamination criteria. However, a single dust wipe sample does not represent an evaluation of indoor air or potential PCB exposure within the school building.

### Recommendations

While the PCBs and pesticides detected in soils do not appear to present an immediate exposure risk based on the information provided, the concentrations of PCBs and pesticides do exceed applicable NJDEP remediation standards. NJDEP has advised the School District of the investigation and remediation requirements and understands the District to be in the process of engaging a Licensed Site Remediation Professional (LSRP). The LSRP must follow the applicable regulatory process, fully characterize the extent of soil impacts, and remediate the soils as appropriate. Based on the information available at this time, there are no regulatory limitations on the use of the school building or grounds during the course of this investigation.

Finally, NJDOH encourages school administrators to follow USEPA guidance on how to implement best management practices to minimize potential exposures to PCBs. More information can be found in the USEPA's guide entitled *Practical Actions for Reducing Exposure to PCBs in Schools and Other Buildings* (2015). This and other resources for school administrators regarding PCBs are appended to this letter.

The Departments thank the Woodbridge Township and School District officials for bringing these issues to our attention and invite you to contact us should you have any further questions or concerns.

Sincerely,



Shawn M. LaTourette, Commissioner  
NJ Department of Environmental Protection



Judith M. Persichilli, R.N., B.S.N., M.A.  
Commissioner, NJ Department of Health

#### References (hyperlinked)

[Report](#): Expected Number of Brain and Other Central Nervous System Tumors Among Students and Employees at Colonia High School, Woodbridge, Middlesex County, New Jersey (NJDOH 2022) and [Frequently Asked Questions](#)

[Data Brief](#), Brain and Other Nervous System Tumors, New Jersey, Trends in Incidence Rates in New Jersey, 1990-2019, by Gender (NJDOH 2022)

[Data Brief](#), Brain and Other Nervous System Tumors, New Jersey, by Gender & Subtype, 2015-2019 (NJDOH 2022)

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Department of Environmental Protection

Shawn M. LaTourette, Commissioner

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Department of Health

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## **Resources PCBs in Schools**

USEPA: PCBs in Building Materials

<https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials> -

USEPA: Practical Actions for Reducing Exposure to PCBs in Schools and Other Buildings

[https://www.epa.gov/sites/default/files/2016-03/documents/practical\\_actions\\_for\\_reducing\\_exposure\\_to\\_pcbs\\_in\\_schools\\_and\\_other\\_buildings.pdf](https://www.epa.gov/sites/default/files/2016-03/documents/practical_actions_for_reducing_exposure_to_pcbs_in_schools_and_other_buildings.pdf)

USEPA: Exposure Levels for Evaluating PCBs in Indoor School Air

<https://www.epa.gov/pcbs/exposure-levels-evaluating-polychlorinated-biphenyls-pcbs-indoor-school-air> -

USEPA: Evaluation of Mitigation Methods and Source Characterization workplan to test methods for in-situ PCB encapsulation

<https://www.epa.gov/sites/default/files/2015-08/documents/research-plan-draft.pdf> -

USEPA: Summary of findings for USEPA Evaluation of Mitigation Methods and Source Characterization

[https://www.epa.gov/sites/default/files/2015-08/documents/pcb\\_encapsulation\\_fs.pdf](https://www.epa.gov/sites/default/files/2015-08/documents/pcb_encapsulation_fs.pdf) -

New York State Protocol for Addressing Polychlorinated Biphenyls in Caulking Materials in School Buildings

<https://www.p12.nysed.gov/facplan/HealthSafety/PCBinCaulkProtocol-070615.html> -

Harvard Study: An Unrecognized Source of PCB Contamination in Schools and Other Buildings

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1247375/pdf/ehp0112-001051.pdf> -