Washington University in St. Louis
ENVIRONMENTAL HEALTH & SAFETY

February 5, 2019

Annah Murray
Regional PCB Coordinator
Waste Remediation and Permitting Branch
Air and Waste Management Division
U.S. Environmental Protection Agency Region VII
11201 Renner Blvd
Lenexa, Kansas 66219

Re: Urbauer Hall EPA Site Visit Summary Report October 29, 2018

Dear Ms. Murray,

In response to your concerns:

The University conducted sampling of the sump water in the pit of Urbauer elevator. Sampling results are attached (Attachment 1), and indicate 11 micrograms/L of Aroclor-1242 and 1 microgram/L of Aroclor-1260. These levels are well below the EPA criteria of 50 milligrams/L and considered trace levels. However, in an abundance of caution, sump pit water is being directed into a 55 gallon drum and collected for proper disposal by Washington University (WU) Environmental Health and Safety (EH&S).

In order to address any occupant safety concerns, WU conducted air sampling of the elevator pit and cab area using EPA's Compendium Method TO-10A. Sampling results for the elevator cab (Attachment 2) indicate 77 nanograms/m^3 of Aroclor-1016. Sampling results for the elevator pit indicate 290 nanograms/m^3. Both results were below the potential action (exposure) level of 500 nanograms/m^3. Additionally, the EPA exposure model assumes receptors would be present 6 hours/day, for 185 days/year, far below the duration occupants of the pit or cab would be expected to be present in these areas.

WU has modified the signage in the pit area to address "markings" (M^L) concerns. This signage (Attachment 3) details the presence of PCB's, as well as cautions and instructions for entering the elevator pit.

At this time WU is awaiting results of coring samples conducted on the elevator pit concrete and soil below. Results of this sampling will determine WU's path forward and assist in the determination of feasibility of remediation. WU will contact EPA as soon as our determination is made.

Please feel free to contact me for further clarifications if needed.

Sincerely,

Linda Vishino

Linda Vishino
Director, Office of Environmental Compliance

Attachments

c: Bruce Backus
Chris Goddard

RECEIVED
FEB 11 2019
AWMD/WRAP IO

Washington University in St. Louis, Campus Box 8229, 4533 Clayton Avenue, Suite 100, St. Louis, Missouri 63110
(314) 362-6816, Fax (314) 362-1995, http://ehs.wustl.edu/

EMSL Analytical, Inc.
200 Route 130 North, Cinnaminson, NJ 08077
Phone/Fax: (856) 303-2500 / (856) 858-4571
http://www.EMSL.com EnvChemistry2@emsl.com

EMSL Order: 011808797
CustomerID: ESCL75
CustomerPO:
ProjectID:

Attn: **Scott George, P.G. CHMM**
Environmental Science Consulting, LLC
Seven Dixie Drive
Fenton, MO 63026

Phone: (636) 734-1548
Fax:
Received: 10/18/18 9:20 AM

Project: Urbauer Hall

Analytical Results

Client Sample Description E. Sump Elevator Sump Water ***Collected:*** 10/16/2018 1:03:00 PM ***Lab ID:*** *011808797-0012*

Method	*Parameter*	*Result*	*RL*	*Units*	*Prep Date*	*Analyst*	*Analysis Date*	*Analyst*
GC-SVOA								
608.3	Aroclor-1016	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1221	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1232	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1242	11 D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1248	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1254	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1260	1.0 D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1262	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL
608.3	Aroclor-1268	ND D	0.50	µg/L	10/26/2018	AB	11/8/2018	TL

Definitions:
ND - indicates that the analyte was not detected at the reporting limit
RL - Reporting Limit (Analytical)
D - Dilution

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EMSL Order: 011810475
CustomerID: ESCL75
CustomerPO:
ProjectID:

Attn: **Scott George, P.G. CHMM**
Environmental Science Consulting, LLC
Seven Dixie Drive
Fenton, MO 63026

Phone: (636) 734-1548
Fax:
Received: 12/04/18 9:40 AM

Project: **Urbauer Freight Elevator**

Analytical Results

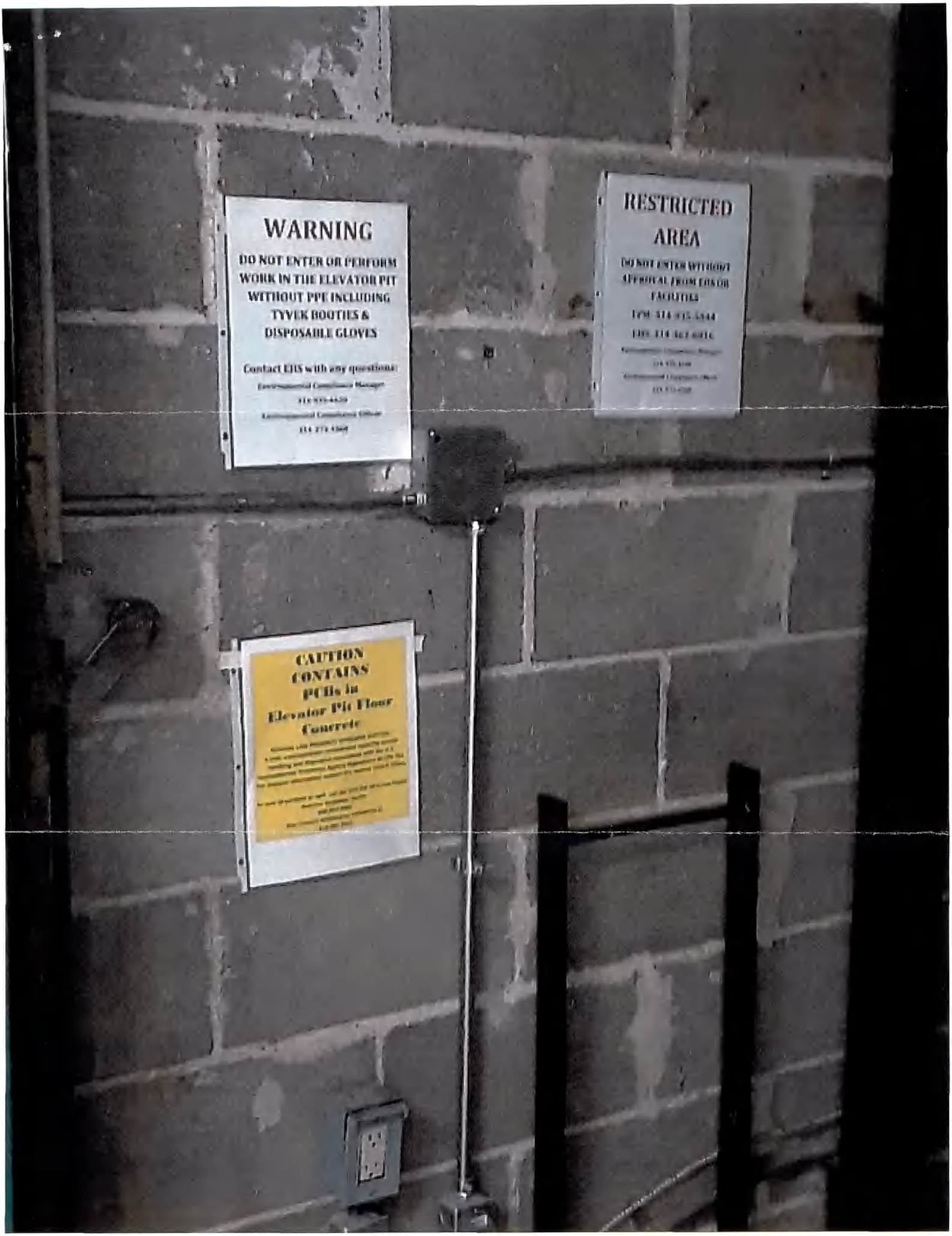
Client Sample Description Urbauer F. 1 ***Collected:*** 12/1/2018 3:18:00 PM ***Lab ID:*** *011810475-0001*

Method	*Parameter*	*Result*	*RL*	*Units*	*Prep Date*	*Analyst*	*Analysis Date*	*Analyst*
GC-SVOA								
TO-10A	Aroclor-1016	0.077	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1221	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1232	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1242	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1248	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1254	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1260	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1262	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1268	ND	0.052	µg/m³	12/6/2018	AB	12/8/2018	EH

Client Sample Description Urbauer F. 2 ***Collected:*** 12/1/2018 3:18:00 PM ***Lab ID:*** *011810475-0002*

Method	*Parameter*	*Result*	*RL*	*Units*	*Prep Date*	*Analyst*	*Analysis Date*	*Analyst*
GC-SVOA								
TO-10A	Aroclor-1016	0.29	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1221	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1232	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1242	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1248	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1254	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1260	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1262	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH
TO-10A	Aroclor-1268	ND	0.051	µg/m³	12/6/2018	AB	12/8/2018	EH

Definitions:
ND - indicates that the analyte was not detected at the reporting limit
RL - Reporting Limit (Analytical)
D - Dilution


WARNING
DO NOT ENTER OR PERFORM WORK IN THE ELEVATOR PIT WITHOUT PPE INCLUDING TYVEK BOOTIES & DISPOSABLE GLOVES
Contact EHS with any questions:
RESTRICTED AREA
CAUTION CONTAINS PCBs in Elevator Pit Floor Concrete