Washington University in St. Louis
ENVIRONMENTAL HEALTH & SAFETY

February 25, 2019

Annah Murray, Physical Scientist
Regional PCB Coordinator/Iowa State Coordinator
U.S. Environmental Protection Agency
EPA Region 7, Regional Office
Waste Remediation & Permitting Branch
11201 Renner Blvd.
Lenexa, Kansas 66219

Re: Maintenance and Monitoring Plan for Polychlorinated Biphenyls
Bryan Hall, Danforth Campus
Annual Sampling
Washington University in St. Louis, Missouri

Dear Ms. Murray:

Enclosed please find the summarized results for the polychlorinated biphenyls (PCB) sampling conducted in support of the "Maintenance and Monitoring Plan for Polychlorinated Biphenyls Bryan Hall, Danforth Campus Washington University in St. Louis, Missouri" (here after known as the MMIP) in accordance with 40 CFR 761.61 (c) and the USEPA REGION 7 conditions identified in previous correspondence related to the approved remediation and encapsulation of PCBs in Bryan Hall during a renovation project. The renovation project is almost completed and partially occupied.

The PCB sampling effort identified in the MMIP included the following samples:

- Indoor Air - Air sampling will be conducted once a year and a minimum of four air samples will be collected during each round of sampling. Indoor air samples will be collected at locations to characterize potential exposure risks to occupants of the Building. Quality assurance and quality control sampling will include blanks, duplicate samples, and ambient (outdoors) air samples.

- Surface – Sampling will be conducted once a year. Samples will be collected in approximately six indoor locations during each round to evaluate potential exposure risks to occupants of the Building. Sampling will focus on commonly used surfaces such as student desks and tables. In addition, samples will be collected from surfaces more likely to accumulate dust such as book shelves.

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(314) 362-6816, Fax: (314) 362-1995, Email: ehs@wustl.edu, www.ehs.wustl.edu,

- Surface Encapsulated Materials - Sampling will be conducted once a year. A total of approximately 6 samples will be collected to evaluate potential breakthrough of PCBs through the encapsulate. Prior to collecting samples, visual inspections of representative areas will be completed to note any damage to the surfaces. Sampling will include encapsulated surfaces around windows and doors on the south, east, and west façades of the Building.

All affected coated window surfaces are covered by metal framing in all locations and drywall in finished locations. The complete covering of the encapsulated surfaces resulted in wipe samples collected on the finished window frame surfaces. The resulted for all air and wipe samples are included in the attached Table 1. WUSTL Bryan Hall Sample Result Summary.

All results are within acceptable regulatory criteria.

If you have any questions feel free to contact me at 314-273-4568.

Sincerely,

Linda Vishino

Linda Vishino
Director, Office of Environmental Compliance

Table 1. WUSTL Bryan Hall PCB Sample Result Summary

Sample Designation	PCB Results and Units	Aroclor (if detected)	Typical PCB Action Levels
Bryan Hall Fifth Floor **Wipe** Samples			
1 - 511.1	ND	NA	**10 µg/100 cm2**
2 - 511.2	ND	NA	**10 µg/100 cm2**
3 - 512	ND	NA	**10 µg/100 cm2**
Bryan Hall Fourth Floor **Wipe** Samples			
4 - 409	ND	NA	**10 µg/100 cm2**
5 - 409W	ND	NA	**10 µg/100 cm2**
6 - 409WD (duplicate)	ND	NA	**10 µg/100 cm2**
7 - Blank	ND	NA	**10 µg/100 cm2**
8 - 411	0.53 µg/100 cm2	Aroclor-1254	**10 µg/100 cm2**
Bryan Hall 4th Floor, 5th Floor and Outdoor **Air** Samples			
1 - 511.1	ND	NA	500 ng/m3
2 - 511.2 (duplicate)	ND	NA	500 ng/m3
3 - Blank	ND	NA	500 ng/m3
4 - 409	ND	NA	500 ng/m3
5 - 512	ND	NA	500 ng/m3
6 - 411	ND	NA	500 ng/m3
7 - Outdoor	ND	NA	500 ng/m3
ND = Non-Detect. NA = Not Applicable			
µg/wipe = µg/100 cm2			
USEPA (40 C.F.R. part 761) action criteria for dust (wipe) samples is 10 ug/100cm2			
USEPA Exposure Levels for Evaluation of PCB's in Indoor School Air is 500 ng/m3 (adults).			