UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

January 27, 2014

Sandra Lyon, Superintendent
Santa Monica Malibu Unified School District
1651 Sixteenth Street
Santa Monica, California 90404

Dear Superintendent Lyon:

EPA has conducted a preliminary review of the post-cleaning PCB verification samples from Malibu High School/Middle School. These samples were collected pursuant to the workplan ("Limited PCB Remediation, Verification Sampling Work Plan for Malibu High School / Middle School," The Phylmar Group, Inc.) accepted by EPA on December 20, 2013. The workplan was limited to air and surface wipe sampling in the five rooms with elevated PCB concentrations in caulk or dust based on sampling conducted by the District in November 2013. The purpose of this letter is to inform you of our findings for these five rooms and provide guidance as you prepare a plan to remediate caulk identified as containing 50 parts per million (ppm) or more total PCBs.

PCBs were widely used in caulking materials in buildings built from the 1950s until the late 1970s, as well as in paints and other building materials. It is common to find PCBs at levels greater than 50 ppm in building materials used in structures such as schools that were constructed or renovated during this time frame. The Toxic Substances Control Act (TSCA) regulates materials containing PCBs. It established a concentration of 50 ppm of PCBs as a threshold for materials regulated by TSCA.

EPA has not derived a health based threshold concentration for PCB impacted caulk. EPA research indicates that the potential health risks associated with contaminated caulk come primarily from inhalation of PCBs that have migrated from the caulk into the air. For this reason, EPA recommends that schools concerned with potential PCB contamination evaluate the indoor air quality. If PCB concentrations in air exceed the health based threshold for schools, then potential sources of PCBs should be investigated and mitigated to reduce air concentrations below a health based threshold. Based on EPA practice at other schools, EPA is using 0.2 ug/m3 total PCBs as the health based air threshold for Malibu High School/Middle School.

EPA is providing you with our preliminary findings in advance of receiving the full analytical data report required in the workplan from the District. We expect to receive the full report from you in approximately 20 days. Ms. Katherine Baylor, from my office, was on-site January 3, 2014 to observe the collection of air and wipe samples in the five rooms that had elevated caulk and/or wipe sample results. She observed that all appropriate sampling

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protocols consistent with EPA's acceptance of the workplan were followed. Our preliminary findings below could change upon review of the workplan final report. We are also awaiting EPA laboratory analysis of the independent wipe samples taken by Ms. Baylor. We expect these results in mid February, 2014.

Meanwhile, the post-cleaning air sampling results provided to EPA by the District for the five rooms are below the 0.2 ug/m3 EPA health based threshold for PCBs in schools and within our acceptable risk range for residential exposures. Likewise, all seven post-cleaning wipe samples taken within the interior or exterior of the five rooms are below our regulatory threshold (10 ug/100cm2). When compared to sampling conducted previously by the District, the wipe samples show post-cleaning reductions of between 93% and 99% and the air samples show post-cleaning reductions of approximately 50% in the five rooms cleaned. We understand that the District will be implementing a district-wide cleaning program. EPA recommends that, as part of the cleaning program, the District consider annual thorough cleaning of the school to maintain air quality.

In addition to the analytical report due in February, no later than March 30, 2014 the District must submit a plan that at a minimum addresses the following:

1. Removal of all caulk with known concentrations above 50 ppm PCBs in the library and in Blue Building Rooms 1, 5, and 8. Even though air concentrations are below our health based guidelines, the cleanup plan should include post caulk removal air sampling as well as wipe sampling around the areas where caulk was removed.

2. Mitigation or removal of any caulk that is deteriorating in pre-1979 structures at Malibu High School/Middle School. After mitigation or removal of any caulk, the windowsills and adjacent areas should be thoroughly cleaned.

3. Development of an air sampling plan for EPA approval that, at a minimum, ensures that all rooms in pre-1979 structures at the school will be sampled. It is acceptable for the District to conduct PCB Aroclor analysis in lieu of the PCB congener analysis the District previously conducted.

If you have any questions, please feel free to contact me at 415-972-3352 or at Armann.Steve@epa.gov. Thank you.

Sincerely,

Steve Armann
Manager, RCRA Corrective Action Office
Waste Management Division

cc: Thomas Cota, DTSC