MONROE PUBLIC SCHOOLS
Learning for Life

Operations & Support Services
200 East Fremont Street
Monroe, WA 98272-2336
Phone: 360 804 2570
Fax: 360 804 2529

September 9, 2016

Jefferson Ketchel
Director, Environmental Health Division
Snohomish County Health District
3020 Rucker Avenue, Suite 104
Everett, WA 98201-3900

Michelle Mullin
PCB Coordinator
U.S. EPA Region 10
Via email @ mullin.michelle@epa.gov

Kendall Moore
PCB Coordinator
U.S. EPA Region 5
Via email @ moore.kendall@epa.gov

Subject: Corrective Action Plan for Sky Valley Education Center
351 Short Columbia Street, Monroe, WA 98272

Dear Mr. Ketchel, Ms. Mullin, and Mr. Moore:

This letter serves as the Monroe School Districts notice of completion of the activities articulated in the May 25, 2016 Corrective Action Plan for Sky Valley Education Center. We believe that the eight items included on that Corrective Action Plan have been satisfied as of this date.

Items 1-3: Fluorescent Light Fixtures – As we have previously informed you, the district has chosen to approach remediation, inspection, and re-testing of potentially contaminated fluorescent light fixtures in a fashion different than initially outlined in our May 25th plan.

As communicated in June, instead of continuing to attempt to clean the fluorescent light fixtures that once housed PCB containing light ballasts we are removing those fixtures and replacing them with new LED light fixtures. As of August 31st all fluorescent light fixtures that formerly contained a T-12 magnetic ballast have been removed from all buildings on the Sky Valley campus.

As agreed to in June, performing confirmation wipe samples of fixtures found to be contaminated with PCBs is no longer pertinent or required given the wholesale replacement and appropriate disposal of such fixtures.

Item 4: Remediation of PCB Caulk – NorthStar, the abatement contractor awarded this scope of work, has completed the removal of all interior and exterior PCB Caulk at Sky Valley (as delineated in the previously submitted plan drawings titled "*Sky Valley Caulking Locations Plans 1-5*" per the specifications titled "*02 84 00 PCB Sky Valley Technical Specification,*" also previously submitted.

Two layers of the approved Sikagard 62 High Build Epoxy have been applied over each joint where PCB caulk has been removed as outlined in the March 25th Corrective Action Plan.

As required, confirmation wipe samples were taken of surfaces adjacent to the areas of removed PCB caulking as work was completed in each building. Of the ninety-four (94) wipe samples taken 85 came back as "None Detected". The other nine (9) samples showed a residual amount of PCBs to be present. All but two of those results came in below the 10 ug/100 cm2 EPA action threshold. The two (2) samples that came back above the 10 ug/100 cm2 threshold were on the interior of the Small Gym (13 ug/100 cm2), and on the exterior of the Admin Building (12 ug/100 cm2).

In all nine instances where a PCB wipe sample returned any level other than "None Detected" we required the abatement contractor to conduct additional cleaning of the area. Re-testing of the two locations that had initially exceeded the EPA's 10 ug/100 cm2 threshold were conducted, and after the additional cleaning returned results of "None Detected."

Confirmation air samples have been taken in interior spaces of all structures in which PCB caulk was removed. Fifty-six (56) air samples were taken in total, and all came back as "None Detected."

Item 5: Remediation of PCB Paint – Previously Satisfied as described in May 25 Corrective Action Plan.

Item 6: PBS Environmental Air Tests Positive for PCBs – Confirmation air samples have been taken by PBS Environmental in all areas of the Annex Building where previous sampling indicated the presence of PCBs in the air. These air samples overlapped – were in the same interior spaces – as those required for PCB caulk removal confirmation addressed in Item 4 (above), and are therefore included in the total count of fifty-six (56) air samples taken. All came back as "None Detected."

Item 7 (listed in March 25th Corrective Action Plan as Item 8): Removal of Old Carpet – The carpet in the North Pod of the Library/Pod Building, in Room A (aka, Salmon Room) of the Annex Building, and in the Band/Music room and Family and Consumer Science room in the Gym/Music Building have all been removed and new flooring has been installed.

Item 8 (listed in March 25th Corrective Action Plan as Item 9): Housekeeping and Best Management Practices –The majority of the sub-items in this section of the plan have been addressed either in the May 25th Corrective Action Plan, or in subsequent communication. All items not previously addressed will be completed by the end of the work day on August 31st.

In summary, we believe that we have adequately addressed each of the items outlined in our May 25th Corrective Action Plan for Sky Valley Education Center. Given that, we also believe that it would now be allowable for students and younger siblings to return to the campus.

Respectfully,

John A. Mannix
Assistant Superintendent, Operations

Enclosures: Air Sample Chain of Custody documents (5)
Air Sample Lab Reports (5)
Wipe Sample Chain of Custody document (6)
Wipe Sample Lab Reports (6)

Cc: Dr. Fredrika Smith – Superintendent, Monroe School District No. 103
Devlin Piplic – Director of Facilities, Monroe School District No. 103
Karen Rosencrans – Director, Sky Valley Education Center
Kevin Plemel – Environmental Health Manger, Snohomish County Health District
Amanda Zych – Environmental Health Specialist, Snohomish County Health District
Nancy Bernard – Program Manager, School Environmental Health and Safety, Washington State Department of Health