Message

From: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
Sent: 9/22/2016 8:12:02 PM
To: Peachey, Robert [peachey.robert@epa.gov]; Mullin, Michelle [Mullin.Michelle@epa.gov]; Moore, Kendall [moore.kendall@epa.gov]
Subject: RE: Completion of SVEC Corrective Action Plan

My comments in red for your consideration.

From: Peachey, Robert
Sent: Thursday, September 22, 2016 2:19 PM
To: Mullin, Michelle <Mullin.Michelle@epa.gov>; Moore, Kendall <moore.kendall@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: RE: Completion of SVEC Corrective Action Plan

These all look fine to me.

--Bob

Robert M. Peachey
Office of Regional Counsel
U.S. EPA Region 5 (C-14J)
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From: Mullin, Michelle
Sent: Thursday, September 22, 2016 2:18 PM
To: Moore, Kendall <moore.kendall@epa.gov>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Peachey, Robert <peachey.robert@epa.gov>
Subject: RE: Completion of SVEC Corrective Action Plan

Draft response to Mr. Mannix- please let me know your input by COB Friday.

Dear Mr. Mannix,

Thank you for answering our questions below and in a separate email on 9/16/16 about your air sampling methodology. We still have a couple of outstanding questions.

Ex. 5 AC/DP

Ex. 5 AC/DP

Sincerely,
Michelle Mullin

From: Mannix, John [mailto:mannixj@monroe.wednet.edu]
Sent: Monday, September 12, 2016 2:45 PM
To: Moore, Kendall <moore.kendall@epa.gov>
Cc: Jeff Ketchel <jketchel@snohd.org>; Mullin, Michelle <Mullin.Michelle@epa.gov>; Deka Smith <smithf@monroe.wednet.edu>; Devlin Piplic <piplicd@monroe.wednet.edu>; Karen Rosencrans <RosencransK@monroe.wednet.edu>; Peachey, Robert <peachey.robert@epa.gov>; Nancy Bernard <nancy.bernard@doh.wa.gov>; Amanda Zych <azych@snohd.org>; Kevin Plemel <kplemel@snohd.org>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>; Mangino, Mario <mangino.mario@epa.gov>
Subject: Re: Completion of SVEC Corrective Action Plan

Kendall, et al.,

I wanted to get this information off to you before the end of your day. The only thing I'm waiting for is the Method TO-10A procedure from the lab. I will forward that as soon as it is received.

In response to the seven questions posed:

1. Final QA/QC data for the wipe samples of small gym floor and exterior of Annex Building
Provided via email on Friday, September 9, 2016.

2. Area (in square feet) of small gym floor and area exterior of Annex building that were re-cleaned
The entirety of the regulated area in question was re-cleaned, not just the containment area or a portion of the containment area. The regulated area included the entire west wall and associated flooring out roughly 10' from the wall. I can have the PBS Environmental technician who was overseeing that work calculate the approximate size of the area if that is of concern.

3. Rational for collecting one sample of the floor in the small gym
The technician taking the samples believed that one sample would be representative of the space. The work practices of the abatement contractor (NorthStar) were closely monitored by staff from PBS Environmental, and followed the Technical Specification developed by PBS Environmental. That 97% of the wipe samples taken came in under the EPA's threshold of 10 ug/100 cm2 the first time around -- and that over 90% of them came back as "none detected" -- testifies to the quality and effectiveness of the process and work performed. The two spaces where results came in slightly over the EPA threshold (12 ug/100 cm2 and 13 ug/100 cm2) were immediately re-cleaned and came back as "none detected" in the subsequent confirmation testing.

4. Please report all air sample quantitation limits/reporting limits as ng/m3
Revised air sample reports showing all air sample limits and reporting as ng/m3 provided by ALS Environmental (please see attachments). The other air sample reports contained results in the requested ng/m3 originally.

5. Were the wipe samples collected after caulk removal collected before or after epoxy encapsulation?
The initial set of confirmation wipe samples were collected after the epoxy encapsulant had been applied and allowed to cure for a minimum of 24 hours. Further wipe samples will be taken this winter (December/January time frame), and next summer (July/August time frame), as required by the Corrective Action Plan (item 4: Remediation of PCB Caulk).

6. Explain the filter analysis procedure used for air samples run under Method TO-10A.
To be supplied by ALS Environmental (will forward when received).

7. Also, can you report whether the air samples were collected under normal building HVAC operating conditions?
According to the PBS Environmental technician on site at the time the air samples were conducted, and as verified by Devlin Piplic, the district's Director of Facilities, the air samples were collected under normal operating conditions for the HVAC system.

Please let me know if there are any further clarifications needed.

Regards,

John Mannix
Assistant Superintendent for Operations

200 E. Fremont Street
Monroe, WA 98272
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On Fri, Sep 9, 2016 at 2:05 PM, Moore, Kendall <moore.kendall@epa.gov> wrote:

> Thank you for your completion report. In order to fully evaluate your results EPA requests the following:

1. Final QA/QC data for the wipe samples of small gym floor and exterior of Annex Building

2. Area (in square feet) of small gym floor and area exterior of Annex building that were re-cleaned

3. Rational for collecting one sample of the floor in the small gym

4. Please report all air sample quantitation limits/reporting limits as ng/m^3

5. Were the wipe samples collected after caulk removal collected before or after epoxy encapsulation?

6. Explain the filter analysis procedure used for air samples run under Method TO-10A.

From: Mannix, John [mailto:mannixj@monroe.wednet.edu]
Sent: Friday, September 09, 2016 1:57 PM
To: Jeff Ketchel <jketchel@snohd.org>; Mullin, Michelle <Mullin.Michelle@epa.gov>; Moore, Kendall <moore.kendall@epa.gov>
Cc: Deka Smith <smithf@monroe.wednet.edu>; Devlin Piplic <piplicd@monroe.wednet.edu>; Karen Rosencrans <RosencransK@monroe.wednet.edu>; Nancy Bernard <nancy.bernard@doh.wa.gov>; Amanda Zych <azych@snohd.org>; Kevin Plemel <kplemel@snohd.org>
Subject: Re: Completion of SVEC Corrective Action Plan

Attached please find the revised notice of completion of the Corrective Action Plan for Sky Valley Education Center. I am not re-sending the twenty attachments containing the lab results and chain of custody documents. Those are all still valid and appropriate. I am therefore simply adding the two new documents related to the re-testing of the PCB wipe test results that previously exceeded 10 ug/100 cm2.

Respectfully,

John Mannix

Assistant Superintendent for Operations

200 E. Fremont Street

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