As discussed during our telephone conversation of Tuesday, May 10, 2016, here is the follow-up communique regarding specific questions or areas of clarification in the matter of Sky Valley Education Center's Poly-chlorinated Biphenyl (PCB) concerns.

1. Specifics on how many lights have been cleaned and if there are more that need cleaning

   As of this date all fluorescent light fixtures in the Annex Building and Library/Pod Building have been cleaned using Xylene. This includes all fluorescent light fixtures previously tested by EPA:

   - Classroom C Ballast 2
   - Classroom C Ballast 3 Cover
   - Classroom C Ballast 3 Fixture
   - Classroom D Ballast 4
   - Classroom D Floor under Ballast 4
   - Classroom D Ballast 6
   - Classroom D Ballast 6 Cover
   - Classroom D Floor under Ballast 6
   - Classroom D Floor Utility Cover
   - Room 2 Ballast 3
   - Room 5 Ballast 1
   - Room 14
   - Room 20

   It also includes all fluorescent light fixtures in the Annex Building and Library/Pod Building where PBS Environmental found some level of PCB contaminants in the air, including:

   - Annex, Room A
   - Annex, Room C
   - Annex, Room D
   - Annex, Room F
   - Annex, Girl's Restroom
   - Annex, Hall – East
   - Annex, Hall – West
   - Annex, Montessori Science Prep Room
   - Library/Pod Building, Room 11

   Although this cleaning effort also includes all other fluorescent light fixtures in those two buildings – which were the only two structures where EPA's wipe testing or PBS Environmental's air sampling resulted in any level of PCB contamination – spot checking of fluorescent light fixtures in the Library/Pod building in advance of re-testing indicated that some of the fixtures had not been cleaned to our expected standards.

Therefore, we are currently working to re-clean fluorescent light fixtures other than those in the two bulleted lists above. We are proceeding with re-testing of the fixtures and rooms enumerated in the two bulleted lists above, but will hold off on random testing of other fixtures until we are confident that they will pass inspection.

Meanwhile, our maintenance crew is continuing to work on cleaning all other fluorescent light fixtures throughout the Sky Valley campus, and will be done with that work before the end August. This includes all light fixtures in the Gym/Music Building, Technology Building, and Office Building (map provided).

Additionally, given the outcome of our spot checking prior to random sampling, we are implementing a more rigorous system of double-checking the cleaning of all fluorescent light fixtures as we move forward. Our Director of Facilities will personally oversee this inspection protocol, and only maintenance staff who have received the PCB clean-up training from Argus-Pacific will be allowed to perform the double-check inspections. These inspections will be performed by someone other than the staff member who performed the initial cleaning of any particular room or fixture.

2. A schedule for the repeat wipe and air sampling that you stated your consultant will perform next week.

   Gregg Middaugh of PBS Environmental is on site at Sky Valley at this time (May 12, 2016) and is scheduled to conduct the repeat wipe and air sampling of the fixtures and spaces included in the two bulleted lists (above) today and tomorrow (May 13, 2016).

   We are expediting the shipment of the samples taken and also the lab analysis with a target of having the lab test results available on or before Friday, May 20th.

   Proposed Completion: We intend to begin random sampling of other fluorescent light fixtures beginning June 1, 2016. Our target for completing the clean-up and random sampling of all buildings is August 1, 2016.

3. Information on how your consultant collected the paint sample.

   According to Gregg Middaugh of PBS Environmental the paint sample was a single scraping with a razor blade. The sample collected was a composite of all paint layers down to the cementitious sub-strata. Greg indicated that there were multiple layers of paint, and that to the best of his recollection there were likely four or five in total.

The sample was analyzed in the lab as a composite sample, with all layers of paint (thus the entire mass of the sample) being analyzed with a result of 0.196 mg/kg.

Further investigation of the light blue paint used in the interior commons area, or Gathering Place as it is commonly referred to, leads us to believe that it is not in fact the most recently applied layer of paint that produced the 0.196 mg/kg result. The staff and administrator at Sky Valley indicate that although their PTO did donate funds to purchase new paint to brighten up the space, the paint was purchased at Lowe's Hardware. The staff has the receipt for the paint purchase, and Lowe's is adamant that they have not provided any paint containing PCBs.

Given this information it seems likely that a much older layer of paint, possibly even the original coating utilized during the 1967 construction of the building, is the likely culprit.

According to Mr. Middaugh it would be exceedingly difficult to differentiate separate layers of paint in the various strata, given that each is roughly 4 to 5 mils (4/1,000th to 5/1,000th of an inch) in thickness.

Proposed Remediation: We propose coating the entirety of the surface of this area with an epoxy paint product to ensure that the older layer of paint that contains PCBs, and should already be encapsulated by one or more subsequent layers of paint, is fully and completely encapsulated behind another fresh coating of material. The Epoxy material will last longer and be more resistant to cuts, abrasions, and other damage caused by typical use of the space.

Proposed Completion: We propose a target completion date of August 31, 2016 for this work.

4. A description of your proposal to remove the PCB caulk.

Proposed Remediation: We propose to contract with PBS Environmental to undertaking additional sampling of the gray caulk to determine the location and extent of application. Given that samples of gray caulk came back with as little as 1.04 mg/kg, and as high as 5,730 mg/kg, in PCBs, we would like to see if we can more accurately establish the location of each material. This would allow us to concentrate our resources on the removal of the material that exceeds 50 mg/kg.

Once the location of the higher concentration material has been established, we propose to remove the material containing 50 ppm or more of PCBs by hand scraping, without the removal of windows, doors, or destruction of the structural columns. The scraping will be conducted by properly trained individuals wearing appropriate personal protective equipment. The waste caulk will be disposed of following all applicable EPA guidelines. Any

residual caulk that cannot be removed by hand scraping will be encapsulated by painting a suitable epoxy material (or other suitable material, as approved by EPA and SCHD). New caulk will be installed after the encapsulant has dried.

We also proposed taking representative wipe samples of the surface of the new caulk once it has cured properly, to ensure that any residual PCBs are not leaching through the encapsulant layers; and taking annual representative wipe samples until such time as the building is fully modernized or replaced to ensure that the residual PCBs do not begin leaching through the encapsulant layers at a later date.

Proposed Completion: We propose a target completion date of August 31, 2016 for this work.