UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 95105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

AUG 14 2014

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

Dear Ms. Lyon:

This letter provides EPA's assessment of the work performed this summer by the Santa Monica-Malibu School District to address PCBs at Malibu schools. It also confirms the District's plans to remove PCB-containing caulk that it found to be above regulatory thresholds at Malibu High School.

The District followed EPA's recommendation to conduct inspections and initiate best management cleaning practices at Malibu High School, and your District elected to include Juan Cabrillo Elementary School in this work. The District also proposed collecting air and wipe samples at both schools. On June 9, 2014, your contractor, ENVIRON, sent EPA an air and wipe testing plan. EPA provided comments and concurred on the revised plan dated June 13, 2014. In addition, EPA staff were on site in June at Malibu High School to observe the inspection and testing work. Based on EPA's evaluation of the work conducted this summer, the Agency has determined that the work was consistent with EPA's national guidance.

The work undertaken by the District focused on the human exposure pathways of greatest concern for school environments, specifically air, dust and soil, to make sure that those pathways have been effectively addressed. As you are aware, the California Department of Toxic Substances Control is the lead agency for soil investigations. All recent air samples but one (Room 303 in Building F at the high school) have shown PCB concentrations below EPA's national public health guidelines for PCBs, and we have been informed your District is now taking steps to address the possible causes of higher air levels in that room. Recent tests of dust levels were below our health-based screening level in all rooms except: Room 303 in Building F at the high school; Room 506 in Building G at the high school; and Room 6 in Building C at the elementary school. EPA understands additional cleaning is being performed in those three rooms.

The air and dust sampling results serve as the basis for appropriate decisions by the District as the school opens for the Fall semester next week, including allowing staff and students access to those classrooms that have been shown to meet EPA's health-based guidelines. EPA understands the District has decided that these rooms will not be occupied until they meet EPA's protective dust and air guidelines.

The Toxic Substances Control Act (TSCA) does not require schools or building owners to test caulk for PCBs. However, in 2013 the District voluntarily tested window caulk at Malibu High School and found four samples above the TSCA regulatory threshold of 50 ppm. On August 14, 2014, the District

submitted to EPA revisions to their Malibu High School Plan to address caulk known to contain PCBs above 50 ppm. I want to acknowledge the District's plan to remove the caulk from these four windows by June 30, 2015. In addition, within one year, the District will replace light fixtures at both schools stained by leaks from previously removed PCB-containing ballasts.

EPA concurs with this approach, and we will coordinate with you on abatement activities that require EPA approval under TSCA. EPA does not recommend additional testing of caulk unless dust or air samples persistently fail to meet EPA's health-based guidelines.

In summary, the District is meeting EPA national guidelines to protect public health from PCBs in schools by addressing the human exposure pathways of greatest concern, namely air, dust and soil.

Sincerely,

Jared Blumenfeld

cc:. Miriam Ingenito, Acting Director, DTSC