Danner, Ward

From: Huetteman, Tom
Sent: Tuesday, September 15, 2015 10:01 AM
To: Armann, Steve
Subject: Malibu FOIA - FW: Call with Environ

Tom Huetteman, Assistant Director
Land Division, USEPA Region 9
415-972-3751

From: Huetteman, Tom
Sent: Wednesday, December 17, 2014 5:05 PM
To: Scott, Jeff; Armann, Steve
Subject: Fwd: Call with Environ

EXEMPTION (b)(5) - Internal Deliberative

[redacted]

[redacted]

Tom Huetteman, Assistant Director
Land Division, EPA Region 9
415-972-3751

Begin forwarded message:

> **From:** "Jen@mu" <jen@malibuunites.com>
> **Date:** December 17, 2014 at 4:31:58 PM MST
> **To:** "Armann, Steve" <Armann.Steve@epa.gov>
> **Cc:** "Scott, Jeff" <Scott.Jeff@epa.gov>, "Huetteman, Tom" <Huetteman.Tom@epa.gov>, Cami Winikoff <cami@sobini.com>, Hope Edelman <hopeedelman@gmail.com>, Paula Dinerstein <pdinerstein@peer.org>, "Sabrina Venskus" <venskus@lawsv.com>
> **Subject: Re: Call with Environ**
>
> Dear Steve:
>
> Testing only the four rooms is not sufficient knowing that there are PCBs at 370,000 ppm in parts of the school. And what about Juan Cabrillo? Why are you not requesting a detailed plan?
>
> I know the district attorney's office has shared their test results with you verifying that there are over 300,000 ppm of PCBs present in the school. This information cannot be ignored and yet the district has no plans to identify the extent of the PCB contamination in the buildings where independent testing has proving that there are PCBs over 50 ppm and then remove them in compliance with the law.
>
> And now that you know the district is pre-cleaning classrooms with a special crew to come in moments before they're going to dust and air sample, any results will be biased and will not tell

us the information needed to be protective of student and staff.

It has been over a year and we all cannot continue to play these games. Doing this right the first time, testing the sources and removing them would have been far less expensive than this "avoidance testing" that the district is doing. Have you asked the district how much of taxpayer's money they've spent on air and just sampling and all of their cleaning? Have you asked them how much of the taxpayers money they spent on their attorneys? Have you asked them how much they spent in June July and August 2014? (Hint: it's a lot!)

Air and wipe samples will never remove the problem from the buildings. This EPA recommendation is just a continuous waste of money when the problem will still have to be addressed. This current path is fiscally irresponsible and does not ensure the health and safety of those on campus.

The law is very clear; buildings on our campuses have PCBs over 50 ppm which means that the entire campus needs to be assessed and PCBs over the legal limits removed.

I look forward to your responses.

Jennifer deNicola
Malibu Unites
America Unites for KIDS
www.MalibuUnites.com

On Dec 16, 2014, at 4:29 PM, Armann, Steve <Armann.Steve@epa.gov> wrote:

Jennifer, the air sampling methods for this winter's sampling will be the same as the methods used during the summer, i.e., windows closed, room closed for 24 hours prior to testing, and the lights on. We currently do not have the specific locations that will be sampled this winter; however, at a minimum the four rooms that the District tested with caulk above 50 ppm will be tested.

Steven S. Armann, Manager
Corrective Action Office (LND-4-1)
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3352
Fax: 415-947-3533
Email: armann.steve@epa.gov

-----Original Message-----
From: Jen@mu [mailto:jen@malibuunites.com]
Sent: Thursday, December 11, 2014 11:18 PM
To: Armann, Steve
Cc: Scott, Jeff
Subject: Call with Environ

Dear Steve,

Again, thank you for your prompt reply. In regards to the upcoming call with Environ, would you please put in writing for us and include exactly what sampling protocol is to be used. Also, please forward the written plan Environ is to follow regarding testing. They should not be doing this testing without a detailed plan (which is standard practice) that has been QAQC'd and includes the exact locations of testing, how it will be preformed and what the guidelines are. This will help eliminate the problem we had last Dec when the EPA clearly stated testing is to be done with the Windows closed and yet the very next day, the district tested with the windows open. We both know air testing can be easily manipulated and just want to ensure the best testing practices are used so that they yield valid results that parents and educators can rely on.

Based on our discussions as well as the experts at the 8th International PCB conference, best practices for air test are: seal the room for 24 to 48 hours prior to testing, test with the windows closed and the ventilation system off (and we don't really have one in most rooms but where we do it pulls outside air into the classroom biasing results).

A fully transparent testing process needs to occur. Everyone should know exactly what room is being tested prior to testing and then what the results are once it's been tested. Suspicion occurs when the information is provided only to Environ and then results are analyzed and recapped only by Environ. If the process is completely legitimate than the district should not be worried about being fully transparent to everyone.

Lastly, have you thought about suggesting long term air testing that can yield more accurate exposure results? This was discussed by the EPA research and development team at the conference. Just wondering...

Thank you for your continued help in this matter. I can hardly believe it's over year later and we're still discussing the same problems :(

Happy Holidays,

Jennifer deNicola
Malibu Unites
America Unites for KIDS
www.MalibuUnites.com