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

JUL 31 2014

OFFICE OF THE
REGIONAL ADMINISTRATOR

The Honorable Barbara Boxer
United States Senate
Oakland Office - Attention: Ms. Madeline Peare
70 Washington Street, Suite 203
Oakland, CA 94607

Dear Senator Boxer:

EPA shares your concerns regarding potential health impacts posed by PCBs at Malibu High School, Malibu Middle School and Juan Cabrillo Elementary School. At the invitation of Ms. Jennifer deNicola, President of Malibu Unites, on June 20, 2014, I toured Malibu High School and met with Ms. deNicola, representatives of her organization, school officials, and teachers to hear their concerns firsthand.

PCBs were widely used in building materials in the United States, including in school construction, from the 1950s until 1979. Recognizing the concerns from widespread exposure to PCBs, in 1976, Congress passed the Toxic Substances Control Act (TSCA), which among other things bans the use of PCBs, other than in a totally enclosed manner or as authorized by EPA via rulemaking.

In recent years, EPA has devoted considerable resources and attention to identifying PCB exposure pathways of concern and how best to limit or mitigate those pathways. Recent scientific studies, including a 2012 study by EPA's Office of Research and Development (ORD), show that primary health concerns from PCBs in building materials derive from inhalation of contaminated air; and secondarily from contact with PCBs in dust and subsequent incidental ingestion.

In her letter to you, Ms. deNicola requests that EPA require testing of all potential PCB sources at the Malibu High School. Based upon the science, EPA's current recommended approach for school managers is to focus testing on air and dust for PCBs to assess the level of hazard, if any, to student and teacher populations. To the extent that any levels of concern in air or dust are identified, schools should address the primary source of the health risk, including incorporating additional and more extensive cleaning practices and PCB-source identification and removal where necessary.

The District has been responsive to the above protocol by taking extensive air and dust samples in classrooms at Malibu High School in preparation for classes to begin in fall, based on EPA-approved procedures. All air samples but one have shown PCB concentrations below the Agency's public health guidelines. The District did discover a low number of dust samples where PCBs were elevated. The District has taken quick action to incorporate a cleaning and testing program at the High School that EPA believes will effectively address this pathway of human exposure. The District's testing and cleaning work concludes on August 8. The District has also been inspecting light fixtures to ensure that PCB-containing ballasts have been removed. Although most ballasts were previously removed, several

existing light fixtures show staining from past PCB ballast leaks. The District plans to remove the stained light fixtures.

In her letter to you, Ms. deNicola also asks for the immediate removal of all known PCB sources at Malibu High School that contain PCBs at or above 50 ppm. Specifically, last October, the District voluntarily collected caulk samples that identified four classrooms where PCBs in the caulk exceeded that regulatory limit.

I concur that the TSCA regulations do not authorize the use of building materials containing PCBs above 50 ppm. The District's plan submitted to EPA on July 3, 2014, proposes to remove PCB-containing material in the four classrooms during renovation or demolition of the buildings. This proposal is currently under review. During the week of August 11, we will provide our conclusions about the work conducted this summer by the District and outlining a path forward for completing removal of PCBs required under TSCA. School opens the following week.

To reiterate, EPA continues to take the concerns raised by teachers and parents at Malibu High School very seriously. We are committed to ensuring that students and teachers at this school, as in all schools, are safe from exposure to PCBs. For this very reason, the focus of our efforts has been on partnering with the District to identify the human exposure pathways of greatest concern, namely air and dust, and making sure that those pathways are effectively addressed in a manner that makes the High School safe now and into the future.

For your information, enclosed with this letter is an earlier correspondence EPA sent to Ms. deNicola regarding PCBs at Malibu High School.

Thank you for your attention to this matter. For further assistance, please contact Congressional Liaison, Brent Maier, at (415) 947-4256.

Jared Blumenfeld