UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

DATE: August 29, 2013

SUBJECT: PCB Inspection: Public School 038 – The Pacific School
450 Pacific Street
Brooklyn, New York 11217

FROM: James S. Haklar, Ph.D.
Environmental Engineer, Toxics Section
Pesticides & Toxic Substances Branh

TO: Susan Schulz, Chief
Toxics Section

On August 14, 2013, a Toxic Substances Control Act (TSCA) polychlorinated biphenyl (PCB) inspection was performed at the above-referenced school. The purpose of the inspection was to observe the removal and disposal of PCB ballasts and associated fluorescent light fixtures by PAL Environmental Services, an asbestos abatement contractor. The United States Environmental Protection Agency (EPA) began the inspection by holding an opening conference with the following individuals:

- Craig Hnis, Industrial Hygienist, New York City School Construction Authority (SCA)

- John Garoutsos, SAI Environmental Consultants (a consultant to the SCA)

- Igor Zarubin, TDX Construction Corporation (the general contractor for the project)

Also present was Dennis Santella of EPA Region 2's Office of the Regional Administrator. EPA presented credentials and issued a Notice of Inspection (see Attachment 1).

Background

Public School 038 is located in a three-story masonry building. The school has an enrollment of approximately 494 students and serves students in kindergarten through the fifth grade as well as special education. The school's ventilation system exhausts air from the classrooms. According to the custodian, windows were replaced within the prior 6 years.

On August 2, 2011, EPA issued a cleanup and disposal approval to the SCA to address PCB-contaminated soil located next to the school.

The facility is one of approximately 90 schools to date in which the SCA is performing school-wide replacement of existing PCB fluorescent light ballasts and fixtures. At each school, an SCA industrial hygienist, along with an independent consultant, oversee the lighting replacement activities.

Inspection Details

School-wide removal of the existing light ballasts and fixtures had been completed and waste was scheduled for off-site transport and disposal. EPA obtained copies of the daily ballast tally sheets as well as a summary sheet (see Attachment 2). Based on the information provided on the daily tally sheets, 448 leaking and 530 non-leaking ballasts were removed (all ballasts are assumed to be PCB-containing). Comparison with the summary sheet reveals a slight discrepancy in these numbers (the summary sheet shows 452 leaking and 487 non-leaking ballasts).

SCA and its consultant/general contractor explained to EPA that the number of stained fixtures equals the number of leaking ballasts.

EPA inspected the PCB waste storage area. The poly-lined, contained area was secured and isolated from the other work areas. The exterior was not marked as required by 40 CFR 761.40. Upon EPA's recommendation a compliant PCB mark was affixed to the exterior of the storage area.

All ballasts are assumed to be PCB-containing. The ballasts (as well as broken and intact bulbs) are being disposed of by Veolia Environmental Services (West Bridgewater, MA). All fixtures are being disposed of by Wayne Disposal (Belleville, MI).

Conclusion

EPA concluded the inspection with a discussion of the Agency's observations. A Receipt for Samples and Documents was also completed (see Attachment 3).

Attachment

1. Notice of Inspection
2. Daily Tally and Summary Sheets
3. Receipt for Samples and Documents

Attachment 1

Notice of Inspection

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

EPA

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

NOTICE OF INSPECTION

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date: 8-14-13	Inspector No.: F16426	Daily Seq. No.: 1	0900	P.S. 38 - THE PACIFIC SCHOOL

4. Inspector Address	5. Firm Address
U.S. EPA REGION 2 2890 WOODBRIDGE AVE. EDISON, NJ 08837-3679	450 PACIFIC ST. BROOKLYN, NY 11217

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks):*

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
[signature]		[signature]	
Name: JAMES S. HAKLAR		Name: Craig Hnis	
Title: ENVI. ENGR.	Date Signed: 8-14-13	Title: IHC	Date Signed: 8/14/13

EPA 7740-3 Rev (8-91)

Inspection File

Attachment 2

Daily Tally and Summary Sheets

07/19/13

3RD FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
322	12	Ø	12	12	6	6	6	6
316	12	Ø	12	12	6	6	6	6
313	5	Ø	6	4	3	2	2	3
332	1	Ø	Ø	Ø	Ø	Ø	Ø	1
328	2	Ø	Ø	Ø	Ø	Ø	Ø	2
325	1	Ø	Ø	Ø	Ø	Ø	Ø	1
323	2	Ø	Ø	Ø	Ø	Ø	Ø	2
321	4	Ø	Ø	Ø	Ø	Ø	Ø	4
319	1	Ø	Ø	Ø	Ø	Ø	Ø	1
317	1	Ø	Ø	Ø	Ø	Ø	Ø	1
315	4	Ø	Ø	Ø	Ø	Ø	Ø	4
334	12	Ø	12	12	6	6	6	6
HALLWAY	8	Ø	16	Ø	8	Ø	Ø	8
TOTAL	65	Ø	58	40	29	20	20	45

07/22/13 P.S 38 3RD FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
338	12	Ø	12	12	4	8	8	4
336	12	Ø	12	12	6	6	6	6
334	12	Ø	12	12	7	5	5	7
327	4	Ø	4	4	2	2	2	2
326	5	Ø	2	8	1	4	4	1
HALLWAY	17	Ø	34	Ø	10	7	7	10
A/B STAIRWAY	5	10	Ø	Ø	5	Ø	Ø	5
340	12	Ø	12	12	3	9	9	3
342	12	Ø	12	12	6	6	6	6
344	12	Ø	12	12	5	7	7	5
346	12	Ø	12	12	6	6	6	6
HALLWAY	4	Ø	8	Ø	4	Ø	Ø	4
	119	10	132	96	59	60	60	59

07/23/13

P.S. 38 3RD FL.

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
302	12	Ø	12	12	10	2	2	10
304	12	Ø	12	12	8	4	4	8
306	12	Ø	12	12	10	2	2	10
311	1	Ø	Ø	Ø	Ø	Ø	Ø	1
341	1	Ø	Ø	Ø	Ø	Ø	Ø	1
343	1	Ø	Ø	Ø	Ø	Ø	Ø	1
345	1	Ø	Ø	Ø	Ø	Ø	Ø	1
347	10	Ø	Ø	Ø	Ø	Ø	Ø	10
348	12	Ø	12	12	12	Ø	Ø	12
300	12	Ø	12	12	9	3	3	9
STAIRWAY C	4	4	4	Ø	3	1	1	3
STAIRWAY D	4	4	4	Ø	4	Ø	Ø	4
HALLWAY	37	Ø	74	Ø	30	7	7	30
	119	8	142	60	86	19	19	100

07/24/13 P.S. 38 2ND AND 3RD FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
308	12	Ø	12	12	7	5	5	7
310	12	Ø	12	12	8	4	4	8
312	12	Ø	12	12	10	2	2	10
F/E STAIRWAY	5	4	6	Ø	5	Ø	Ø	5
200	12	Ø	12	12	7	5	5	7
248	12	Ø	12	12	4	8	8	4
246	12	Ø	12	12	5	7	7	5
244	12	Ø	12	12	8	4	4	8
242	12	Ø	12	12	9	3	3	9
240	12	Ø	12	12	10	2	2	10
	113	4	114	108	73	40	40	73

07/25/13 P.S 38 2ND FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
202	12	∅	12	12	11	1	1	11
204	18	∅	18	18	6	12	12	6
206	6	∅	6	6	2	4	4	2
208	12	∅	12	12	6	6	6	6
210	12	∅	12	12	5	7	7	5
247	1	∅	∅	∅	∅	∅	∅	1
241	1	∅	∅	∅	∅	∅	∅	1
D. STAIRWAY	4	8	∅	∅	4	∅	∅	4
C -"-	4	8	∅	∅	∅	4	4	∅
HALLWAY	16	∅	32	∅	11	5	5	11
	86	16	92	60	45	39	39	47

07/26/13 P.S. 38 2ND FL 450 PACIFIC STR

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
212	12	Ø	12	12	6	6	6	6
HALLWAY	24	Ø	48	Ø	17	7	7	17
EF STAIRWAY	6	Ø	10	2	5	1	1	5
213	5	Ø	6	4	3	2	2	3
216	12	Ø	12	12	7	5	5	7
224	12	Ø	12	12	5	7	7	5
226	5	Ø	2	8	Ø	5	5	Ø
227	4	Ø	4	4	1	3	3	1
HALLWAY	14	Ø	28	Ø	9	5	5	9
211	1	Ø	Ø	Ø	Ø	Ø	Ø	1
215	4	Ø	Ø	Ø	Ø	Ø	Ø	4
217	1	Ø	Ø	Ø	Ø	Ø	Ø	1
219	1	Ø	Ø	Ø	Ø	Ø	Ø	1
221	4	Ø	Ø	Ø	Ø	Ø	Ø	4
223	1	Ø	Ø	Ø	Ø	Ø	Ø	1
225	1	Ø	Ø	Ø	Ø	Ø	Ø	1
228	3	Ø	Ø	Ø	Ø	Ø	Ø	3
230	1	Ø	Ø	Ø	Ø	Ø	Ø	1
232	1	Ø	Ø	Ø	Ø	Ø	Ø	1
GYM RM	2	Ø	Ø	Ø	Ø	Ø	Ø	2
GYM RM	2	Ø	Ø	Ø	Ø	Ø	Ø	2
GYM RM	11	Ø	Ø	Ø	Ø	Ø	Ø	11
GYM RM	3	Ø	Ø	Ø	Ø	Ø	Ø	3
	130	Ø	138	46	53	41	41	89

07/29/13 P.S. 38 1ST FL AND 2ND FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
222	12	Ø	12	12	4	8	8	4
236	12	Ø	12	12	5	7	7	5
238	12	Ø	12	12	7	5	5	7
HALLWAY	7	Ø	14	Ø	4	3	3	4
234	12	Ø	12	12	4	8	8	4
104	12	Ø	8	12	5	5	5	7
102	13	Ø	8	12	10	Ø	Ø	13
100	12	Ø	8	12	6	4	4	8
148	12	Ø	12	12	5	7	7	5
D STAIRWAY	5	Ø	10	Ø	5	Ø	Ø	5
HALLWAY	18	Ø	36	Ø	14	4	4	14
149	1	Ø	Ø	Ø	Ø	Ø	Ø	1
147	2	Ø	Ø	Ø	Ø	Ø	Ø	2
145	2	Ø	Ø	Ø	Ø	Ø	Ø	2
	132		144	96	69	51	51	81

07/31/13 P.S. 38 1st FL

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
106	14	ϕ	4	18	3	8	8	6
108	9	ϕ	ϕ	18	3	6	6	3
HALLWAY	22	ϕ	44	ϕ	10	12	12	10
FE STAIRWAY	7	ϕ	10	ϕ	1	4	4	3
114	2	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	2
112	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
110	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
116	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
118	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
EXIT STAGE	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
144A	6	ϕ	6	6	3	3	3	3
146	12	ϕ	12	12	ϕ	12	12	ϕ
HALLWAY	8	ϕ	16	ϕ	4	4	4	4
141	2	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	2
143	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
	97	ϕ	92	54	24	49	49	48

08/01/13 P.S. 38 1st FLOOR.

	Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
	134	8	ϕ	6	6	ϕ	6	6	2
	136	6	ϕ	4	8	2	4	4	2
	138	12	ϕ	ϕ	14	3	4	4	8
	142	12	ϕ	12	12	4	8	8	4
	144	4	ϕ	ϕ	8	ϕ	4	4	ϕ
C	STAIRWAY	5	ϕ	10	ϕ	2	3	3	2
	HALLWAY	16	ϕ	16	ϕ	3	13	13	3
	140	2	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	2
	143	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
EXIT	STAGE	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
AB	STAIRWAY	7	ϕ	12	2	5	2	2	5
	113	5	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	5
		82	ϕ	60	50	19	44	44	38

08/02/13 P. S. 38 1ST FLOOR

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
204	4	∅	8	∅	2	2	2	2
126	7	∅	6	4	∅	5	5	2
128	1	∅	2	∅	1	∅	∅	1
132	14	∅	2	20	3	8	8	6
HALLWAY	13	∅	26	∅	3	10	10	3
124	1	∅	∅	∅	∅	∅	∅	1
122	1	∅	∅	∅	∅	∅	∅	1
120	2	∅	∅	∅	∅	∅	∅	2
KITCHEN	36	∅	∅	∅	∅	∅	∅	36
STORAGE (1)	4	∅	8	∅	4	∅	∅	4
STORAGE (2)	1	∅	2	∅	1	∅	∅	1
EXIT	1	∅	∅	∅	∅	∅	∅	1
	85		54	24	14	25	25	60

08/05/13

CROSS BAY AND CAFETERIA.

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
CAFETERIA	33	ϕ	16	48	8	24	24	9
CROSS BAY	11	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	11
	44	ϕ	16	48	8	24	24	20

08/06/13 P.S 38 BASEMENT

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
BOILER RM	32	ϕ	56	ϕ	21	11	11	21
CROSS BAY	35	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	35
B13	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
B1	9	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	9
	77	ϕ	56	ϕ	17	11	11	66

08/07/13 AND 08/08/13 P.S. 38 BASEMENT

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
B18	2	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	2
B 16	3	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	3
B 14	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
B 12	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
B-8	13	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	13
B-4	1	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	1
B-6	5	ϕ	2	ϕ	1	ϕ	ϕ	5
B-2	9	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	9
B 15	4	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	4
A STAIRWAY	3	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	3
C STAIRWAY	3	ϕ	ϕ	ϕ	ϕ	ϕ	ϕ	3
HALLWAY	18	ϕ	36	ϕ	17	1	1	17

08/12/13 P.S. 38 1ST FLOOR

Room #	Number of Fixtures	Bulbs 2"	Bulbs 4"	Bulbs 8"	Ballast Non Leaking	Ballast Leaking	PCB Fixture	ACM Fixture
AUDITOR	45	∅	72	∅	12	24	24	21

PAL ENVIRONMENTAL SERVICES
PHONE 718-349-0900 FAX 718-349-0900
WEEKLY TIMESHEET

P.S. 38

JOB NUMBER: 13-3494
JOB LOCATION: 450 PACIFIC STR BROOKLYN

PLEASE NOTE: ALL INFORMATION MUST BE FILLED OUT

DRUMS W/BALLAST LEAKING	DRUMS W/BALL NON LEAKING	#	3"	8"	4"	#	3	8"	4"		
0001-90	001 - 105	01	30	x	x	019	x	97	x		
0002- 86	002 104	02	36	x	x	020	35	x	x		
0003 - 75	003 - 93	03	x	99	x	021	x	x	114		
0004 - 93	004 - 117	04	34	x	x	022	x	23	x		
0005 - 88	005 - 68	05	29	x	x	023	32	x	x		
		06	36	x	x	024	x	20	x		
		07	x	x	111	025	x	6	x		
		08	36	x	x	026	x	x	18		
		09	32	x	x	027	x	x	23		
		010	x	91	x	028	x	x	20		
		011	30	x	x	029	x	x	25		
		012	x	110	x	030	x	x	24		
		013	37	x	x	031	x	x	17		
		014	35	x	x	032	x	x	27		
		015	x	x	172	033	x	x	27		
		016	37	x	x						
		017	x	105	x						
		018	x	x	101						

ACM WATE CO:	DATE:	YARDS
A.T.C.	07/24/13	40y
F.C.I PCBs	07/29/13	40y
A.T.C	07/30/13	55y
PCBs FCI	08/05/13	40y
A.T.C	08/06/13	40y
F.C.I P.CBs	08/13/13	

CONVENTIONAL WASTE CO	DATE:	# OF PACKERS/CONTAINER	SIZE

Attachment 3

Receipt for Samples and Documents

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

EPA

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

RECEIPT FOR SAMPLES AND DOCUMENTS

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date: 8-14-13	Inspector No.: F-1626	Daily Seq. No.: 1	PS 38 - THE PACIFIC SCHOOL
3. Inspector Address: USEPA REGION 2, 2890 WOODBRIDGE AVE, EDISON, NJ 08837-3679			4. Firm Address: 450 PACIFIC ST, BROOKLYN, NY 11217

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
1.	BALLAST TALLY SHEET
2.	FIXTURE TALLY SHEETS

Optional:

Duplicate or split samples: Requested and Provided ☐ Not Requested ☐

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Name: JAMES S. HAKLAR		Name: CARL HUNS	
Title: ENVI. ENGR	Date Signed: 8-14-13	Title: I.H.C	Date Signed: 8/14/13

EPA 7740-1 Rev (8-91)

Inspection File