UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

NOV 0 2 2015

Ms. Sandra Lyon, Superintendent
Santa Monica Malibu Unified School District
1651 Sixteenth Street
Santa Monica, California 90404
slyon@smmusd.org

Dear Superintendent Lyon:

Thank you for submitting the Report[1] providing information on PCB sampling and removal activities at Malibu High School (MHS) and Juan Cabrillo Elementary School (JCES) over the past year. This work was outlined in a cleanup application (the "Application")[2] submitted to the U.S. Environmental Protection Agency, Region 9 (EPA) in 2014 and approved, in part, by EPA through the issuance on October 31, 2014 of a Toxic Substance and Control Act (TSCA) approval[3] (the "Approval"). EPA's Approval addressed PCB remediation waste remaining in place after removal of certain PCB-containing materials by the District, including caulk.

After reviewing the information contained in the Report, we have determined that the removal work, BMPs, and air and wipe sampling were performed consistent with EPA's national guidelines to protect public health from PCBs in schools[4] and the terms and conditions of the Approval. In addition, the Report describes the removal by the District of PCB containing fluorescent light ballasts and fixtures, and caulk known and verified to have PCB concentrations at ≥ 50 ppm. Finally, we find that the District has successfully treated the porous and non-porous substrates in contact with the caulk consistent with the requirements of the Approval.

As outlined in the Report, during the summer of 2015, the District took 410 wipe samples and 57 air samples to measure the efficacy of remediation and BMP measures, and ensure that PCB levels in classrooms are below exposure levels established in the Approval. As a result and consistent with our earlier finding in the Approval, EPA continues to find that PCB remediation wastes remaining in place at

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[1] *"Conclusion of PCB sampling Pilot Study and 2015 PCB Removal Activities Report for Malibu High School and Juan Cabrillo Elementary School for the Santa Monica-Malibu Unified School District"* submitted October 2015.

[2] *"Site-Specific PCB-Related Building Materials Management, Characterization and Remediation Plan for the Library and Building E Rooms 1, 5, and 8 at Malibu High School"* dated July 2014 and subsequent amendment *"Supplemental Removal Information for the Library, Building E – Rooms 1, 5, and 8 and Building G – Room 506 at Malibu High School"* dated September 26, 2014.

[3] *"TSCA PCB Cleanup and Disposal Approval under 40 C.F.R. § 761.61(c) for Malibu High School and Juan Cabrillo Elementary School"* issued October 31, 2014

[4] EPA national guidelines on PCBs in caulk were formerly outlined in a document titled "PCBs in Caulk – Q&A". That material has since been updated in *"PCBs in Building Materials – Questions and Answers"* dated July 28, 2015.

MHS and JCES do not pose an unreasonable risk of injury to health or the environment. Furthermore, based upon the sampling data, the District has demonstrated that conditions at both schools continue to meet EPA national guidelines to protect public health from PCBs in schools. Based on the monitoring results to date (over 900 wipe samples and 200 air samples since December 2013), and the ongoing and future implementation of BMPs and monitoring at MHS and JCES, as specified below, EPA does not believe that there is a need for additional testing of potential PCB source materials until planned renovation or demolition.

Page 2 of the Approval required that the District submit the findings of the evaluation of air and wipe samples, along with a supplement to the Application, as needed, to address additional monitoring for the period after July 1, 2015. In accordance with that provision, the District submitted the required supplements in Sections 6.1.3 and 6.2.1 of the Report. Based upon that submission, EPA hereby approves these supplements with the following condition:

- Additional post-BMP air and surface wipe sampling shall be conducted at MHS and JCES, during the 2016 and 2017 summer breaks. At a minimum, air and wipe samples shall be collected in rooms where caulk with PCBs ≥ 50 ppm was removed during the summer of 2015 and PCB remediation wastes remain. The District shall also reevaluate the efficacy of the encapsulant via surface wipe sampling. The results shall be evaluated and reported to EPA 90 days after the completion of each sampling round.

Additionally, the District shall continue to implement the following terms and conditions set forth in the Approval to address PCB bulk remediation waste:

- Any porous substrates (e.g., concrete) in contact with any newly discovered building material with known and verified PCBs ≥ 50 ppm is encapsulated after the newly discovered building material is removed and the encapsulated surface is tested and verified to be below 1 ug/100cm^2 ;

- Any non-porous surfaces (e.g., metal) in contact with any newly discovered building material with known and verified PCBs ≥ 50 ppm is decontaminated and verified through surface wipe testing to be below 1 ug/100cm^2;

- BMPs, including proper maintenance of the ventilation system and increased cleaning of classrooms, continue to be implemented in the manner and frequency specified in sections 1.2, C.1.2, and the supplement to the Application;

- All future air sampling results shall be evaluated using EPA's public health levels for PCBs in air (now renamed "Exposure Levels for Evaluating PCBs in Indoor School Air"), found in *"PCBs in Building Materials – Questions and Answers"* dated July 28, 2015, and wipe sampling results shall be evaluated against a surface concentration goal of 1 µg / 100 cm^2; and

- PCB-contaminated porous substrates shall be removed or decontaminated down to 1 ppm when the specific area is renovated or demolished.

Compliance with the supplemental conditions to the Approval contained in this letter does not relieve the District and its consultants from complying with the terms and conditions of the original Approval,

other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Departure from the Approval as supplemented without prior written permission from EPA may result in revocation of the Approval. Finally, if additional information demonstrates that EPA can no longer make a no unreasonable risk determination, EPA will modify or revoke the Approval, as supplemented.

We appreciate the District's efforts in addressing PCBs at Malibu schools. Please call Steve Armann at (415) 972-3352 if you have any questions regarding this letter.

Sincerely,

for Jeff Scott, Director
Land Division