To: Ogle, Kimberly[Ogle.Kimberly@epa.gov]
Cc: Moore, Kendall[moore.kendall@epa.gov]; Peachey, Robert[peachey.robert@epa.gov]
From: Star, David
Sent: Tue 2/16/2016 5:23:18 AM
Subject: RE: PCB Compliant at Monroe School in Washington State
Andrsn.Ordr.Rmttnc.v2.pdf
Anderson Remittance Agreement Cover Memo.v3.pdf

Ex. 5 - Deliberative Process

[I failed to obtain copies of the "signed" documents from the enforcement team … only the final versions that went through for signature.]

David Star

Chief, Pesticides & Toxics Compliance Section

Chemicals Management Branch

U.S. EPA Region 5 - Chicago

312-886-6009 (telephone)

312-692-2536 (facsimile)

EPA United States Environmental Protection Agency

From: Ogle, Kimberly
Sent: Friday, February 12, 2016 5:00 PM
To: Star, David <star.david@epa.gov>
Cc: Moore, Kendall <moore.kendall@epa.gov>; Dalrymple, Anne <Dalrymple.Anne@epa.gov>; Davies, Lauris <Davies.Lauris@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>; Peachey, Robert <peachey.robert@epa.gov>
Subject: RE: PCB Compliant at Monroe School in Washington State

Ex. 5 - Deliberative Process

From: Star, David
Sent: Friday, February 12, 2016 2:57 PM
To: Ogle, Kimberly <Ogle.Kimberly@epa.gov>
Cc: Moore, Kendall <moore.kendall@epa.gov>; Dalrymple, Anne <Dalrymple.Anne@epa.gov>; Davies, Lauris <Davies.Lauris@epa.gov>; Klevs, Mardi <klevs.mardi@epa.gov>; Peachey, Robert <peachey.robert@epa.gov>
Subject: RE: PCB Compliant at Monroe School in Washington State

Kim:

Here is the outcome on a similar case here in R5. Not saying that the Washington State situation is identical but R5 has (unfortunately for students and teachers) experience in working these types of incidents.

David Star

Chief, Pesticides & Toxics Compliance Section

Chemicals Management Branch

U.S. EPA Region 5 - Chicago

312-886-6009 (telephone)

312-692-2536 (facsimile)

EPA United States Environmental Protection Agency

From: Ogle, Kimberly
Sent: Friday, February 12, 2016 3:32 PM
To: Star, David <star.david@epa.gov>
Cc: Moore, Kendall <moore.kendall@epa.gov>; Dalrymple, Anne <Dalrymple.Anne@epa.gov>; Davies, Lauris <Davies.Lauris@epa.gov>
Subject: PCB Compliant at Monroe School in Washington State

David: attached, please find both the recent press and the write up of the compliant. Once you've talked to Kendall please give me a call and I'll connect him with our travel person and the PCB Coordinator (Michelle Mullin) and her manager (Lisa McArthur). We really appreciate your willingness to help us out on this issue.

Kim Ogle

From: McArthur, Lisa
Sent: Friday, February 12, 2016 1:23 PM
To: Ogle, Kimberly <Ogle.Kimberly@epa.gov>; Davies, Lauris <Davies.Lauris@epa.gov>; Mullin, Michelle <Mullin.Michelle@epa.gov>; Wolfe, Jennifer <Wolfe.Jennifer@epa.gov>
Subject: FW: ELEVATING a human health issue - Monroe School

As you requested, here's the press article and the recent writeup. And in case I haven't said it, to you and Lauris – thank you!

Lisa

Lisa McArthur

RCRA Program Unit Manager

Office of Air, Waste and Toxics

EPA Region 10

(206) 553-1814

mcarthur.lisa@epa.gov

From: McArthur, Lisa
Sent: Thursday, February 04, 2016 4:12 PM
To: Davies, Lauris <Davies.Lauris@epa.gov>; Ogle, Kimberly <Ogle.Kimberly@epa.gov>
Cc: Mullin, Michelle <Mullin.Michelle@epa.gov>; Olson, Lisa <Olson.Lisa@epa.gov>; Hastings,

Janis <Hastings.Janis@epa.gov>
Subject: FW: ELEVATING a human health issue - Monroe School

RE the request for inspection that I sent you on January 28, Monroe school is now in the news. Teachers and students continue to complain that something in the school is making them sick. No mention of ballasts yet. Please let us know when you may be able to respond to this request. Thank you,

Lisa

http://www.heraldnet.com/article/20160203/NEWS01/160209802/1172/On-the-sick-list

Lisa McArthur

RCRA Program Unit Manager

Office of Air, Waste and Toxics

EPA Region 10

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mcarthur.lisa@epa.gov

From: McArthur, Lisa
Sent: Thursday, January 28, 2016 9:55 AM
To: Ogle, Kimberly <Ogle.Kimberly@epa.gov>
Cc: Davies, Lauris <Davies.Lauris@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>; Mullin, Michelle <Mullin.Michelle@epa.gov>
Subject: Request for Inspection at the Sky Valley Education Center in Monroe, WA
Importance: High

Dear Lauris and Kim,

I appreciate the opportunity to request inspection support for the Sky Valley Education Center in Monroe, WA. Repeated PCB light ballast leaks have been reported to Michelle Mullin, our PCB Coordinator, by several parties, including a very concerned teacher, a representative from the Snohomish County Health District, WA DOH and WA Department of Ecology. Complaints have been made to EPA over roughly the course of a year, as ballasts continue to leak. For the protection of human health and the environment, and to bring the school into compliance with Federal Regulations, Michelle and I believe that an inspection is warranted by EPA.

Timeline:

Spring, 2014: Snohomish Health District recalls that a total of 4 ballasts failed during this time period.

Late April, 2014: A teacher complained to the EPA PCB Program of 2 failing light ballasts a week apart. She was concerned about her breast milk becoming contaminated and the safety of the students who were in the room while the ballast smoked for about 45 minutes before the doors and windows were opened. She reported 1 PCB light ballast leaking with brown goop and the other appearing swollen and ready to burst prior to the ballasts smoking. At the time of the call the ballasts had been replaced. But she was unsure if the leak had been cleaned up. Referral to WA DOH regarding breast milk concerns and health risk concerns associated with use of the classroom while ballasts were smoking.

May 1 2014: the EPA PCB Program Coordinator raised the issue as a Hot Topic to management. **Ex. 5 - Deliberative Process**

August, 2014: The facilities department drew a map of all the PCB Fluorescent Light Ballasts (FLBs) and attempted to remove them.

2014-2015: Facilities Department had staffing turnover.

August, 2015, a light ballast leaked in a classroom onto a keyboard, desk, and floor. The leak is reported to have not been addressed properly by a teacher. She claimed that the spill on the floor was never addressed, and was covered with duct tape.

Dec 2, 2015 The Snohomish County Health District inspected the school and reported that the

school facilities personnel stated that the ballast leaked only onto the desk and keyboard, not the carpet, and the leak was cleaned to EPA standards. The inspector did observe duct tape on the floor. The teacher complained to the inspector that she and others are getting sick at school and not while at home. The inspector did not collect any samples.

Dec 4, 2015: Snohomish Health District called the EPA PCB Program and reported the complaint of the leaking light ballast, their Dec 2 inspection and stated that the carpet was removed and there was brown staining on the linoleum tile, which was cleaned, but the inspector was not sure if it was cleaned properly. EPA PCB Program Coordinator elevated the issue to OAWT management.

Dec 7, 2015: OAWT Management referred the situation to OCE.

Dec 18, 2015: EPA PCB Program referred complaint to WA Department of Ecology.

Jan 6, 2016: **Ex. 5 - Deliberative Process**

Jan 26, 2016: the Director of Facilities called the EPA PCB Program. He stated that he believed the initial spill had been cleaned up properly, but after the Health District visited he had the carpet removed from the classroom and cleaned the linoleum underneath. A wipe test was then conducted by an environmental consultant on the cleaned linoleum. The consultant recommendations stated that the concentration of PCBs was so low to not require further action. The concentration reported verbally by the director to EPA was 1800 ug/100 cm2. The regulatory decontamination requirement for unrestricted use of a non-porous surface is 10 ug/100cm2. The Director additionally stated that the maintenance crew is inspecting every ballast and finding leaking fluid. The intention is to find PCB FLBs and remove them. The staff conducting the inspections and cleaning are not trained for PCB handling.

Comments:

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

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The PCB Coordinator believes an inspection of the school is necessary to ensure:

1. Proper protection for maintenance staff who are conducting activities related to PCBs through inspection and cleaning

2. Proper protection for teachers and students in the classroom with the reported leak on the table and floor, both of which may not be properly decontaminated to avoid risk to human health. Samples should be collected on both surfaces

3. That the school is able to identify all leaking PCB FLBs

4. That the school is properly identifying leak material for cleanup at all other leaking FLB locations

5. That the school is aware of how to properly clean identified leak material from PCB FLBs

6. That the school is properly disposing of the PCB FLBs

7. That the school is able to identify all non-leaking PCB FLBs for disposal prior to any additional leaks

Thank you for your time and attention to this request.

Lisa

Lisa McArthur

RCRA Program Unit Manager

Office of Air, Waste and Toxics

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(206) 553-1814

mcarthur.lisa@epa.gov