UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 2 1 2012

John Lebeaux, Town Administrator
Town Hall
Town of Princeton
6 Town Hall Drive
Princeton, Massachusetts 01541

Re: PCB Risk-Based Disposal Plan under 40 CFR § 761.61(c), § 761.62(c) and § 761.79(h)
Thomas Prince School
Princeton, Massachusetts

Dear Mr. Lebeaux:

This is in response to the Town of Princeton, Massachusetts (the Town) Notification[1] for approval to clean up and dispose of PCB-contaminated building materials in the Thomas Prince School located in Princeton, Massachusetts (the Site). The Site contains caulk and other building materials that exceeds the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20(a), § 761.61, and § 761.62.

In its Notification the Town has proposed the following major PCB abatement activities:

- Remove PCB caulk and glazing and associated windows in the 200-wing classrooms, the cafeteria, and the kitchen, and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;

- Remove PCB caulk and exterior louvered air intake vent covers associated with the 200-wing classrooms and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;

- Remove caulk around doorways located in the 200-wing classrooms and dispose of in a TSCA-approved disposal facility or RCRA hazardous waste landfill;

- Clean all indoor surfaces, including unit ventilators, in the 200-wing classrooms;

[1] The notification was submitted by Environmental Compliance Services, Inc. (ECS) on behalf of the Town to satisfy the notification requirements under 40 CFR § 761.61(c) and § 761.79(h). Information was submitted dated January 18, 2012 (PCB Risk-Based Cleanup and Disposal Plan (RBDP)); February 13, 2012 (Revised RBDP and Response to EPA Comments); February 13, 2012 (revised Contractor Work Plan); and, February 16, 2012 (emails regarding field equipment decontamination, outreach, and monitoring plan). These submittals shall be referred to as the "Notification".

- Encapsulate exterior PCB-contaminated *porous surfaces* (i.e., brick, mortar and window sills) with two coats of an epoxy coating;

- Encapsulate interior PCB-contaminated *porous surfaces* (e.g., concrete masonry) with two coats of an epoxy coating; and,

- Temporarily encapsulate exterior PCB caulk located in vertical joints along the building facing side of pre-cast concrete columns and adjacent brick with two coats of an epoxy coating.

Based on the EPA's review, the information provided in the Notification meets the requirements under § 761.62(a) and § 761.79(h) for abatement and disposal of PCB caulk and § 761.61(c) for encapsulation of the *porous surfaces*. EPA finds that the proposed encapsulation of PCB-contaminated *porous surfaces* should effectively prevent direct exposure of these PCB-contaminated *porous surfaces* to building users provided the encapsulated surfaces are maintained. As such, EPA may approve the encapsulation under § 761.61(c).

As indicated above, the Town has requested that it be allowed to leave in-place exterior PCB caulk along the pre-cast concrete columns until waterproofing upgrades occur. The PCB caulk would be encapsulated and monitored under the monitoring and maintenance plan until it can be removed. Based on the location of the caulk and the fact that the caulk and adjacent brick will be encapsulated, EPA is approving the Town's plan under § 761.62(c). However, EPA is requiring submittal of the Town's schedule for removal of the PCB caulk. **Please be aware that approval for this temporary encapsulation shall expire on February 1, 2013**. An extension to this timeframe may be requested. (see Attachment 1, Condition 1.a.)

The Town may proceed with its project in accordance with 40 CFR § 761.61(c); § 761.62(c); § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the long-term monitoring sampling indicate an unreasonable risk to the school users.

Please note the following Attachment 1 conditions:

- **Condition 1.b:** This condition requires submittal of the Town's schedule for investigation and abatement of the PCB contamination in the windows of the 100-wing classrooms and administrative office areas.

- **Condition 10.c**: As indicated in the Notification for the 200-wing classrooms, additional sampling will be conducted to define for encapsulation purposes, the extent of PCB impact to interior concrete masonry and to exterior brick surrounding the louvered vents. This condition requires submittal of the PCB analytical results of this sampling to EPA, including any proposed changes to the encapsulation plan based on these results.

- **Condition 11**: This condition requires the Town to conduct outreach activities for the school community concerning the PCB remediation work. Documentation of the outreach effort must be submitted to EPA.

- **Condition 14.c**: This condition requires submittal of a plan detailing the initial post-abatement surface wipe and indoor air sampling.

- **Condition 16**: As PCBs with greater than (>) 1 part per million (ppm) will remain in the school building, the Town is required to record a notation on the deed to document this fact.

This Approval does not release the Town from any applicable requirements of federal, state or local law, including the Massachusetts Department of Environmental Protection (MassDEP) regulations.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

James T. Owens III, Director
Office of Site Remediation & Restoration

cc C. Klingler, ECS
MassDEP – Central Region
B. Dale Magee, Commissioner DPH
File

Attachment 1: PCB Approval Conditions

ATTACHMENT 1:

PCB RISK-BASED CLEANUP AND DISPOSAL APPROVAL CONDITIONS
THOMAS PRINCE SCHOOL ("the Site")
PRINCETON, MASSACHUSETTS

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Thomas Prince School and identified in the Notification, specifically the 200-wing classrooms, the kitchen, and the cafeteria. [(2)]

   a. Approval for temporary encapsulation of exterior PCB caulk located along pre-cast concrete columns of the 200-wing classrooms shall expire on February 1, 2013 unless revoked, suspended, modified, extended or terminated.

      i. The Town of Princeton (the Town) shall submit a PCB cleanup and disposal plan under §§ 761.61 and 761.62 to address the encapsulated PCB caulk and any associated PCB-contaminated building surfaces (e.g., brick) at least 90 days prior to the expiration date.

      ii. Request of a timeline extension for the temporary encapsulation or for submittal of the PCB cleanup and disposal plan shall be made in writing at least 120 days prior to the expiration date, and shall include a justification for the extension(s). EPA may require the submission of additional information in connection with any extension request.

   b. Within 30 days of receipt of this Approval, the Town shall submit its schedule for the investigation and abatement of PCB contamination associated with the 100-wing classroom windows and the administrative office area windows.

2. The Town of Princeton (the Town) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

(2) The notification was submitted by Environmental Compliance Services, Inc. (ECS) on behalf of the Town to satisfy the notification requirements under 40 CFR § 761.61(c) and § 761.79(h). Information was submitted dated January 18, 2012 (PCB Risk-Based Cleanup and Disposal Plan (RBDP)); February 13, 2012 (Revised RBDP and Response to EPA Comments); February 13, 2012 (revised Contractor Work Plan); and, February 16, 2012 (emails regarding field equipment decontamination, outreach, and monitoring plan). These submittals shall be referred to as the "Notification".

5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.

NOTIFICATION AND CERTIFICATION CONDITIONS

9. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.

10. The Town shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;

    b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

    c. the PCB analytical results for the sampling of the 200-wing classroom interior concrete masonry and the exterior brick surrounding the louvered vents. The Town shall include any proposed changes to the encapsulation plan based on these results.

DECONTAMINATION AND DISPOSAL CONDITIONS

11. The Town shall conduct outreach activities for the school community on the PCB remediation work. The Town shall submit information on its outreach activities within 10 business days of receipt of this Approval.

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

13. All visible residues of PCB-contaminated caulk (i.e. *PCB bulk product waste*) shall be removed as described in the Notification.

14. Initial post-abatement indoor air sampling and surface wipe sampling for both encapsulated *porous surfaces* and cleaned, unencapsulated *porous surfaces* and *non-porous surfaces* shall be conducted for PCBs to determine the effectiveness of the encapsulation and of the cleaning activities.

    a. Initial post-abatement sampling

        i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of less than (<) 0.05 $\mu g/m^3$. At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.

        ii) Wipe sampling of surfaces, (e.g., encapsulated concrete and brick, cleaned unit ventilators and room surfaces, etc.), shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu g/100\ cm^2$). Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q.

    b. In the event that PCB concentrations in the wipe samples are greater than or equal to ($\geq$) 1 $\mu g/100\ cm^2$ or air samples results are greater than (>) 0.100 $\mu g/m^3$, the Town shall contact EPA for further discussion on what, if any, additional abatement measures are required.

    c. Within 7 business days of receipt of this Approval, the Town shall submit a plan identifying the number and locations of the post-abatement air and surface wipe samples.

d. The Town shall submit a monitoring and maintenance implementation plan (MMIP) to monitor the long-term effectiveness of the encapsulants. (See Condition 20).

15. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with CFR 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.

    a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).

    b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

    c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

DEED RESTRICTION AND USE CONDITIONS

16. Within thirty (45) days of completing the activities described in the Notification and in the Approval, the Town shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of the use restrictions for the Site; and the long-term monitoring and maintenance requirements on the Site. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, the Town shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

17. The Town shall notify the EPA of the sale, lease, or transfer of any portion of the building, in writing, no later than thirty (30) days prior to such action. This notification shall include the name, address, and telephone number of the new owner(s) and information regarding the proposed use of the building. In the event that the Town sells, leases, or transfers any portion of the building, the Town shall continue to be bound by all the terms and conditions of this Approval, unless EPA allocates some or all of this Approval's responsibilities to the new owner through the issuance of a modification to this Approval (new owner modification).

18. In the event that the sale, lease or transfer of the building will involve or result in a change in the building use, EPA may revoke, suspend, and/or modify this Approval or the new owner modification, if it finds, due to the change in use, that this risk-based disposal action will not be protective of health or the environment. The EPA may request additional information in order to determine whether to approve the new owner modification. The new owner shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).

19. In any sale, lease or transfer of the building, the town shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval for maintenance and monitoring of coatings and of indoor air (Condition 20), except as provided above.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

20. Within sixty (60) days of completion of the work authorized under this Approval, the Town shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the surface coatings and for indoor air. The Town shall incorporate any changes to the MMIP required by EPA.

    a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable.

    b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including teachers, parents, student, other on-site workers, and interested stakeholders.

    c. The MMIP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the barriers encapsulating the PCB-contaminated surfaces.

    d. The Town shall submit the results of these long-term monitoring and maintenance activities to EPA within fifteen (15) business days of receipt. Based on its review of the results, EPA may determine that modification to the MMIP is necessary in order to monitor and/or evaluate the long-term effectiveness of the coatings.

    e. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

21. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

22. Any modification(s) in the plan, specifications, or information submitted by the Town, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The Town shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.

23. If such modification involves a change in the use of the Site, which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.

24. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

25. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the abatement disposal activities and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.

26. As required under Condition 20 of this Approval, the Town shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA.

27. The Town shall submit a final report, in both hard copy and electronic version, to the EPA within ninety (90) days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities including photo documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by a Town official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.

28. Required submittals shall be mailed to:

    Kimberly N. Tisa, PCB Coordinator
    United States Environmental Protection Agency
    5 Post Office Square, Suite 100 – (OSRR07-2)
    Boston, Massachusetts 02109-3912
    Telephone: (617) 918-1527
    Facsimile: (617) 918-0527

29. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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END OF ATTACHMENT 1