

September 11, 2020  
File No. 01220026.00

Carey Upton  
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(via email: [cupton@smmusd.org](mailto:cupton@smmusd.org))

**Subject: Compliance Review of Testing/Sampling Activities Prior to 2020,  
PCB Interim Measures, Malibu Middle High School  
3917 Long Beach Avenue, Long Beach, California**

Dear Mr. Upton:

SCS Engineers (SCS) presents this report to the Santa Monica-Malibu Unified School District (SMMUSD) concerning the Malibu Middle High School (Site) located in Malibu, California. According to a September 1, 2016 court order from the United States District Court, Central District of California (Case No. CV 15-2124 PA), amended on December 20, 2018, the SMMUSD is required to implement certain interim measures regarding the presence of polychlorinated biphenyls (PCBs) in classrooms. The approved "Testing and Sampling Interim Measures" consist of the following:

- In high use rooms, conduct air testing by a qualified contractor at least once a year, at 3 to 4 separate intervals for varying locations.
- In other rooms, conduct air sampling every two years.
- Dust wipe samples are collected in high use rooms at least once per year, at 3 to 4 separate intervals for varying locations.
- In other rooms, conduct dust wipe sampling every two years.

The Site has not been occupied since the shelter in place order was issued by the State of California on March 19, 2020. Students are not expected to return to the school grounds until after 2020. Remediation of certain areas previously reported as scheduled to take place during the summer of 2020 has been completed, as detailed below.



## Historical File Review Results

SCS reviewed historical documents regarding activities performed in relationship to the presence of PCBs in building materials at the Site. The following activities have been completed as of September 1, 2020:

- Building A (Library) - Abated PCBs and demolished
- Building B/C (Administration) - Abated PCBs and demolished
- Building D (classrooms) - Abated PCBs and demolished
- Building E (Middle School) - Abated PCBs, demolished, and rebuilt
- Building F (Music Building) - Floor tile and associated PCB containing mastic in the Orchestra room and custodial closet was removed and replaced
- Building G - planned to be demolished in 2021
- Building H (Theater and Kitchen) - Three door/window systems and one air vent removed and replaced, these items has associated PCB containing caulking
- Building I (Art Building) - Floor tile and associated PCB containing mastic in the dark room removed and replaced
- Building J (Gymnasium) - Windows and doors replaced, these items has associated PCB containing caulking

## Historical Laboratory Report Review Results

SCS reviewed available laboratory analytical results for PCB air and wipe sampling between the years of 2014 and 2019. Sample results were reviewed for Buildings D, F, G, H, I, and J. Other buildings were previously demolished and not included in this review.

The following table lists the highest concentrations reported during the sampling events conducted for buildings D, F, G, H, I, and J.

Table 1 – PCB Laboratory Results for Air and Wipe Sampling

Building	Date	Max Air Result (ng/m <sup>3</sup> )	Max Wipe Result (µg/100 cm <sup>2</sup> )	Exceeds School Air Threshold? (200 ng/m <sup>3</sup> )	Exceeds EPA Air Threshold? (600 ng/m <sup>3</sup> )	Exceeds EPA Wipe Threshold? (1 µg/100 cm <sup>2</sup> )
D	2014s	110	0.15	No	No	No
D	2014w	ND	ND	No	No	No
D	2015	ND	ND	No	No	No
D	2016	ND	ND	No	No	No
D	2017	ND	ND	No	No	No
D	2018	ND	ND	No	No	No
D	1Q19	ND	ND	No	No	No
D	2Q19	<28	0.116	No	No	No
D	3Q19	ND	0.124	No	No	No
D	4Q19	15.1	0.238	No	No	No
F	2017	<b>220</b>	ND	<b>Exceed</b>	No	No
F	2018	ND	ND	No	No	No
F	1Q19	NS	NS	--	--	--
F	2Q19	NS	NS	--	--	--
F	3Q19	NS	NS	--	--	--
F	4Q19	ND	0.099	No	No	No
G	2014s	150	<b>94</b>	No	No	<b>Exceed</b>
G	2014w	<69	<0.10	No	No	No
G	2015	<70	<b>7.2</b>	No	No	<b>Exceed</b>
G	2016	200	0.28	No	No	No
G	2017	160	ND	No	No	No
G	2018	ND	0.54	No	No	No
G	1Q19	NS	NS	--	--	--
G	2Q19	<28	ND	No	No	No
G	3Q19	140	0.218	No	No	No
G	3Q19-2	ND	ND	No	No	No
G	4Q19	ND	0.187	No	No	No
H	2018	ND	ND	No	No	No
H	1Q19	ND	ND	No	No	No
H	2Q19	NS	NS	--	--	--
H	3Q19-2	ND	0.153	No	No	No
H	4Q19	ND	ND	No	No	No
I	2017	ND	ND	No	No	No
I	2018	ND	ND	No	No	No
I	1Q19	NS	NS	--	--	--
I	2Q19	NS	NS	--	--	--
I	3Q19	ND	0.100	No	No	No
I	4Q19	NS	NS	--	--	--
J	2017	NS	NS	--	--	--
J	2018	ND	0.120	No	No	No
J	1Q19	ND	0.282	No	No	No
J	2Q19	<28	ND	No	No	No
J	3Q19	<b>340</b>	0.420	<b>Exceed</b>	No	No
J	3Q19-2	ND	0.554	No	No	No
J	4Q19	ND	ND	No	No	No

#### Table Notes

EPA = U.S. Environmental Protection Agency

ng/m<sup>3</sup> = nanograms per cubic meter

µg/100 cm<sup>2</sup> = micrograms per 100 square centimeters

s = summer

w = winter

ND = not detected at or above the laboratory reporting limit

<## = analyte not detected at or above the listed laboratory reporting limit

NS = not sampled

-- = not applicable as no samples collected

Bold numbers exceeded one or more listed thresholds

1Q19 = first quarter of 2019

-2 = repeat sampling

## Conclusions and Recommendations

Review of the data in Table 1 above for sampling conducted between 2014 and 2019 reveals that although there were two exceedances of the SMMUSD's internal school threshold for PCBs in Air (200 ng/m<sup>3</sup>), at concentrations of 220 and 340 ng/m<sup>3</sup>, none exceeded the EPA's Threshold for PCBs in Air (600 ng/m<sup>3</sup>). Regarding the EPA Threshold for PCBs in Wipe Samples (1 µg/100 cm<sup>2</sup>), between 2014 and 2019, two exceedances were identified. One sample collected in the summer of 2014 (94 µg/100 cm<sup>2</sup>) and one sample in 2015 (7.2 µg/100 cm<sup>2</sup>) showed concentrations of PCBs in wipe samples exceeding the EPA Threshold level. The 2014 summer sampling was repeated during the winter of 2014, and no exceedances occurred. The 2015 exceedance was resampled in 2016, and was below the EPA Threshold.

Based on the above data review, SCS concludes that the SMMUSD is in compliance with the testing and sampling interim measures through the end of 2019 (the period reviewed for this report), as ordered by the Court. Although there were two exceedances noted in the Wipe samples, the EPA had previously stated that the air and wipe sampling performed by the SMMUSD "was consistent with EPA's national guidance" and that "EPA does not recommend additional testing of caulk unless dust or air samples persistently fail to meet EPA's health-based guidelines." (August 14, 2014 EPA Correspondence). Since the two exceedance Wipe samples were each followed by additional samples which were below the EPA's Threshold, SCS concludes that the Wipe sampling results did not "persistently fail to meet EPA's health-based guidelines."

SCS recommends that the SMMUSD continue with the periodic air and wipe sampling, and perform a sampling event immediately prior to the students planned return to the school. The sampling event should be performed at a date that provides a sufficient amount of time for review of laboratory analytical results, and provides an allowance for additional cleaning, if necessary.

## Limitations

This report has been prepared to assist the SMMUSD in evaluating the efficacy of the interim measures performed. The objective of this assessment was to perform the work with care, exercising the customary skill and competence of consulting professionals in their relevant disciplines in this region. The conclusions presented in this report are professional opinions based solely upon reports prepared by others and our visual non-destructive inspection of the buildings. The opinions presented herein apply to site conditions existing at the time of our investigation and those reasonably foreseeable.

No express or implied representation or warranty is included or intended in our report except that our work was performed, within the limits prescribed by our client, with the customary thoroughness and competence of our profession at the time and place the services were rendered.

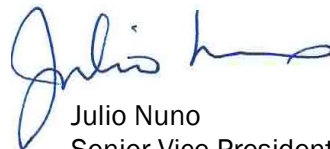
This report was prepared for the use of the Santa Monica Malibu Municipal School District. The contents of the report shall not be used or relied upon in any way by others without prior written approval of SCS.

SCS thanks you for the opportunity to assist in completing this assessment. SCS is available to further discuss our conclusions and recommendations. If you have questions, please do not hesitate to contact us using the telephone numbers provided below.

Sincerely,



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