



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

MAR 21 2018

Mr. Carey Upton  
Chief Operations Officer  
SMMUSD  
1651 16th Street  
Santa Monica CA 90404

**Re: EPA Approval for Characterization and Disposal of PCB Remediation Waste at Buildings A and B/C, Malibu High School, Malibu, California**

Dear Mr. Upton:

Thank you for your submission of the *Notification and Request for Approval, Cleanup and Disposal of PCB Remediation Waste Plan, Buildings A and B/C* dated March 2, 2018 for Malibu High School, Malibu, California. The request is limited to the concrete slabs associated with buildings A and B/C at Malibu High School (Site). Ramboll US Corporation prepared the Notification on behalf of Santa Monica-Malibu Unified School District (SMMUSD or District). The U.S. Environmental Protection Agency (EPA) has reviewed the request and is issuing this approval for concrete characterization and offsite disposal of concrete impacted with polychlorinated biphenyls (PCBs) at the Site, in accordance with the Toxic Substance Control Act pursuant to 40 C.F.R. § 761.61(c).

This approval is independent of the earlier approval issued to the District. In July 2014, the District submitted the "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." This plan was subsequently amended by both an email from Jan Maez to Tom Huetteman on August 14, 2014 and the "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. In response to the plans, on October 31, 2014, EPA issued an approval under 40 CFR 761.61(c) addressing PCB remediation waste remaining in place after removal of PCB-containing caulk. The current notification from the District addresses disposal of PCB-impacted concrete slabs previously in contact with PCB-containing mastic adhesive.

Current modernization activities related to the Site (buildings A and B/C) have resulted in finding additional PCB bulk product and PCB remediation wastes. These buildings are being demolished. These buildings previously held administration offices and classrooms. Building materials were characterized for disposal purposes, which identified PCBs in the mastic adhesive at concentrations >50 ppm PCBs. The 9" x 9" flooring tiles and mastic were removed July 12-18, 2017 and disposed at US Ecology Nevada Beatty, Nevada as PCB Bulk Product Waste.

The adjacent porous substrate (concrete) was sampled in July 2017 and as-found concentrations ranged from non-detect to 24.6 ppm. As the PCB bulk product has been removed from the adjacent

substrate, the substrate is now classified as PCB remediation waste.

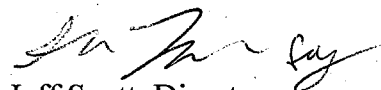
The District sampled the concrete and found that PCBs penetrated the concrete slabs approximately 3/8" and did not fully penetrate the slab. Soil impacts are not considered to be likely beneath the slab. Additional sampling is not necessary. The EPA agrees that adequate sampling was conducted for characterization and disposal and is, therefore, approving the sampling under the risk based option in 40 CFR 761.61(c). Consistent with the Notification and this approval, the District shall dispose of the PCB impacted concrete slabs in accordance with the 40 CFR 761.61(a)(5)(ii) and (iii).

This approval does not relieve the Parties and their consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Nothing in this document bars EPA from imposing penalties for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This approval only applies to the concrete pads for Buildings A and B/C at Malibu High School, as shown on the attached Figure. EPA reserves the right to require additional characterization and/or cleanup of PCBs at the Site if new information shows that PCBs remain at the Site above the EPA-approved PCB cleanup levels, or if PCBs are found at other areas of the Site or immediately adjacent to the Site.


If you have any questions concerning this approval, please contact Amanda Cruz (cruz.amanda@epa.gov) of my staff at (415) 972-3084. Thank you for your cooperation.

Sincerely,



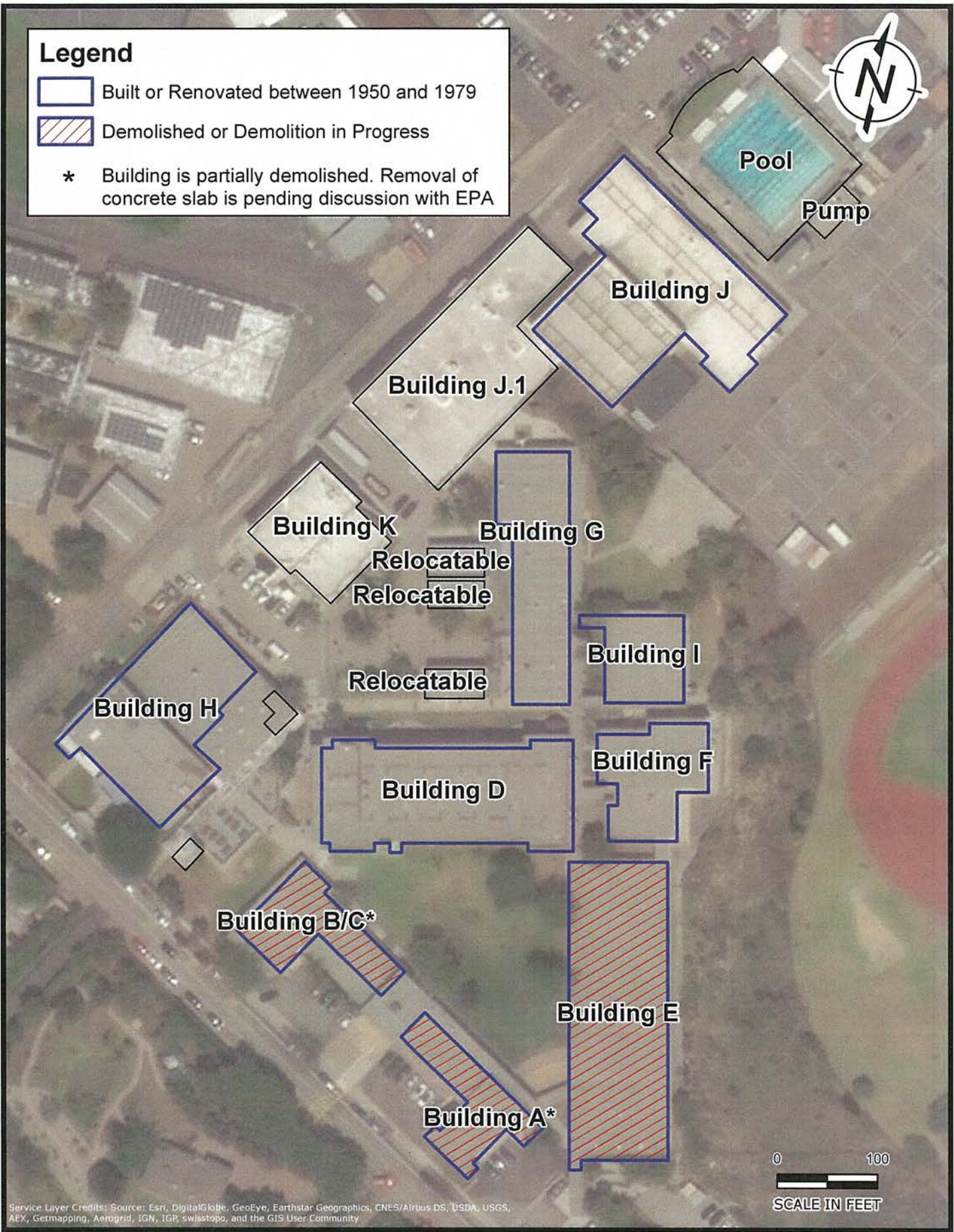
Jeff Scott, Director  
Land Division

**Legend**

 Built or Renovated between 1950 and 1979

 Demolished or Demolition in Progress

\* Building is partially demolished. Removal of concrete slab is pending discussion with EPA



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**Site Plan for Malibu High School**  
Malibu High School  
30215 Morning View Drive, Malibu, California

**FIGURE 1**

DRAFTED BY: RC

DATE: 3/2/2018

PROJECT: 1690001822