SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

The Malibu Times requested information in the form of four questions on March 21, 2016 and SMMUSD responded. The full content of the questions and answers are included below:

1. ***Malibu Times:*** In response to concerns raised by parents, in light of the Flint water crisis, some board members have indicated they don't fully trust the EPA. Is there any reason to believe the Environmental Protection Agency may be derelict in its duty to properly regulate the handling of PCBs and protect the citizens of Malibu? Why or why not?

SMMUSD: **We cannot speak for the activities of EPA Region 5 in Michigan. The District has worked closely with EPA Region 9 regarding Malibu High School and have found them to be very knowledgeable and attentive to the investigation at the site.**

EPA has been highly active in providing timely regulatory input to the District on PCB issues since late 2013. Unlike the situation in Flint, Michigan, where news stories report that there may not have been adequate sampling to understand potential exposures to lead in homes, at MHS and JCES over one thousand samples have been taken during the course of the investigation. These samples measure exposure to PCBs in air and dust to ensure that no one is exposed to levels of PCBs that exceed the EPA's health-protective Exposure Levels for PCBs in Schools, and to accordingly confirm that the schools are safe.

In terms of the basis for the Exposure Levels for PCBs in Schools, EPA's standards are consistent with other national and international governmental agencies including the Agency for Toxic Substances and Disease Registry (ATSDR) and the World Health Organization (WHO). That is, these other regulatory agencies with direct responsibility for ensuring the protection of public health agree that there is a safe exposure level for PCBs and set an exposure threshold that is consistent with EPA's. Furthermore, the Occupational Safety and Health Administration (OSHA) and CalOSHA, which regulate the potential for workplace exposures to various chemicals. have both set acceptable exposure levels for workplace air containing PCBs that are more than a thousand times higher than the levels detected at Malibu High and Juan Cabrillo Elementary Schools.

2. ***Malibu Times:*** Have the district's experts gone above and beyond the EPA's mandates in any areas of testing, encapsulation, remediation, etc? If so, when and how?

SMMUSD: **The District has gone far beyond the EPA requirements for sampling in terms of the extent of samples in the school and the long-term nature of sampling. For example, SMMUSD has voluntarily committed to two more years of air and wipe sampling to confirm its PCB management practices continue to maintain a healthy school environment.**

This testing was not required by EPA. Rather, the District voluntarily undertook both the indoor evaluation for potential exposures to PCBs, as well as an expansive investigation of potential contaminants in the outdoor areas of the campus through a Preliminary Endangerment Study under the oversight of the State of California.

Further, in 2014 the District committed to the EPA to address residual PCB contamination in building materials such as caulk during renovation and demolition activities throughout the District. In fact, those activities will occur at MHS and JCES commencing in the summer of 2016 and continuing with the bond measure redevelopment of MHS in 2017.

3. ***Malibu Times:*** During congressional hearings, the EPA's Region 5 Administrator Susan Hedman was recently accused of "willful blindness" when dealing with data regarding the safety of Flint's drinking water. Why is the district confident the same is not happening in Malibu? Has the EPA Region 9 reached out at all to reassure the district?

SMMUSD: **Far from "willful blindness," EPA officials have visited MHS and JCES and have spoken to and corresponded with community members regularly since 2013 to address questions and concerns. EPA has written to the District—and to others, including Representative Lieu—numerous times, each time emphasizing that the extensive exposure data from MHS and JCES shows that the schools are not a risk to health and reiterating that there is no need for testing of building materials until renovation or demolition of buildings at the two schools. EPA Region 9 has been strongly engaged in the PCB-related activities at MHS and JCES and will continue to be engaged.**

4. ***Malibu Times:*** People are clearly worried - hearings regarding Flint have raised questions about whether agencies are aggressive enough and whether their policies are up to date with scientific findings. People are losing faith in the EPA. What is the district planning to do (or already doing) to combat this new fear?

SMMUSD: **As discussed above, the District has gone above and beyond the requirements identified by EPA. Furthermore, as previously mentioned, EPA has been actively engaged in this issue with the District since late 2013 and has taken a scientific approach to the toxicity of PCBs that is consistent with other national and international**

regulatory agencies. Our experience is that EPA's view of the risks presented by PCBs is entirely consistent with the accepted views of the scientific community.

EPA also continues to monitor the issue of PCBs in schools across the nation and has recently updated their Exposure Limits for PCBs in Schools (EPA 2015a) in light of evolving science regarding PCBs and health. As their understanding of the issues influence their advice to schools and other property owners, the EPA updates its published Q/A (EPA 2015b) and other materials (EPA 2016) regarding PCB management in buildings. EPA is the regulatory authority that the District is required to follow pursuant to federal law, and the District believes that EPA is the expert in providing guidance on this issue.

EPA 2015a. Exposure Limits for PCBs in schools. Available at:
https://www3.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/exposure_levels.htm
EPA 2015b. PCBs in Building Materials—Questions & Answers. Available at
https://www3.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/pdf/pcb_bdg_mat_qa.pdf

EPA 2016. PCBs in Building Materials. Available at:
https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials

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