November 21, 2013

Dear Sandra:

We appreciate the opportunity to speak with you, representatives of the Malibu Middle and High Schools Environmental Task Force (Task Force), and representatives from other regulatory agencies that participated in the call yesterday afternoon. Until now, EPA's role in this matter has been to provide technical assistance to you and the Task Force. However, during yesterday's call we were informed that caulk samples show concentrations of PCBs above 50 ppm.

PCBs in caulk or other building materials at 50 ppm or above is not authorized for use under the Toxic Substances Control Act (TSCA). As such, the School District will need submit for EPA approval a PCB Cleanup Plan consistent with requirements in 40 CFR 761.61(c). In general, we envision that the plan will include the steps described in General Steps for Cleanup Plan noted at the end of this message. I recommend that we schedule a meeting by mid December 2013 to discuss the cleanup plan in more detail.

In reference to the indoor air data that you provided to EPA, we have completed a preliminary review of that data. **The PCB concentrations observed in the 10 air samples collected all show concentrations that are within EPA's acceptable risk range for PCB exposure in a residential setting.** A number of air samples also demonstrated "non-detect" results. Consistent with our discussion yesterday, our residential exposure scenarios assume that individuals are exposed to contaminated media 24 hours a day, 350 days/yr, for 30 years. This is a much more conservative exposure setting than would be expected in a typical school exposure scenario.

EPA has also developed site-specific exposure scenarios for schools which assume that children are exposed in the classroom setting for 10 hrs/day, 180 days/yr, for 6 years. **Our preliminary review of the airborne sampling results confirmed that all observations, albeit limited, are well below the health-based thresholds established by EPA for elementary & high school age children, and adult staff.** We are still conducting a comprehensive review of the wipe sample data.

Based on the preliminary results & limited sampling information available to us to date, we have no reason to believe that there is an immediate or acute threat to the health of the children or the staff at the school from the levels of PCB contamination found.

In light of the fact that certain caulk samples exceed 50 ppm PCBs and wipe samples are showing PCBs in surface areas, we recommend that the School District consider implementing appropriate Best Management Practices (BMPs) as described in EPA's Fact Sheet, "PCBs in Caulk in Older Buildings," December 20, 2012 (http://www.epa.gov/pcbsincaulk/#determine). These BMPs may include:

- Encouraging children to wash their hands with soap and water often and before eating.
- Cleaning to reduce dust and residue inside buildings.
    - Use vacuums with high-efficiency particulate air (HEPA) filters.
    - Use a wet or damp cloth or mop to clean surfaces.
    - Do not sweep with dry brooms; minimize the use of dusters.
    - Wash surfaces, windowsills, walls, and objects often in rooms known to

have PCB-containing caulk or other PCB containing materials.
- Ventilating rooms before being occupied (bring in fresh air).

We are available to discuss implementation of BMPs at your earliest convenience. We would consider implementation of BMPs to be "interim actions to reduce risk" and not a final cleanup plan.

Additional information on research that EPA has conducted on PCBs in schools is available in the document "Polychlorinated Biphenyls (PCBs) in School Buildings: Sources, Environmental Levels, & Exposures" (EPA/600/R-12/051/Sept 30, 2012/ www.epa.gov.ord).

General Steps for Cleanup Plan

- Inspection of school buildings to identify via observation, and where applicable via testing, other potential sources of PCBs such as paint, fluorescent light ballasts, window glaze material, and ceiling tiles.
- Removal and disposal of caulk material and any other source(s) of PCBs present at the school. Disposal to be consistent with TSCA and state regulations.
- Testing of surfaces (e.g., concrete, masonry, metal) underlying the caulk or other PCB material such as paint.
- Cleanup of surfaces that have been in contact with PCB sources such as caulk consistent with a cleanup level to be established by EPA and procedures to be approved in the plan.
- Inspection of the ventilation system and collection of bulk dust samples for analysis, if in sufficient amount. Wipe samples should be collected, otherwise.
- Cleaning of the ventilation system, if necessary; and demonstration of the system's efficacy pre and post cleanup.
- Sampling and analysis of soils within 3 to 5 feet from school buildings; and removal of soils containing PCBs above a cleanup level to be established by EPA.
- Post-cleanup re-testing of indoor air within the school to verify cleanup efficacy. This testing is to include collection of background outdoor air samples.
- Post-cleanup re-testing of critical surfaces within the school building such as student desks, teachers' desks, and tables.
- Sampling and Analysis Plan detailing sampling and laboratory analysis procedures.
- Schedule to conduct the tasks required in the cleanup plan.

Although the list of tasks above may seem overwhelming, we will work with the School District to ensure the cleanup is planned in an efficient and effective manner. If you have any questions please feel free to call me or my staff. We look forward to working with you to address this situation. Thank you.

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