



July 28, 2014

### Update from the Superintendent

#### **BUILDING B/C (BUILDING 900, WHALE BUILDING) TO REOPEN FOLLOWING ENVIRONMENTAL TESTING**

The first phase of our environmental inspection, sampling and cleaning has been completed in Building B/C (Building 900, Whale Building). Attached you will find a summary of pre- and post-cleaning results for this area. This report provides the preliminary results and initial conclusions. These data show that PCB concentrations in all air and final post-BMP wipe samples taken in 7 regularly occupied rooms are lower than EPA's acceptable exposure levels. Therefore, BMP cleaning was successful and no additional BMP cleaning in these regularly occupied rooms of Building B/C (administration building) is needed. Based on this information, the District will reopen this area for school and community activities beginning July 29, 2014. A building-specific report summarizing inspection observations, sampling locations and results, and conclusions is pending receipt of validated data and will be posted online when completed.

July 28, 2014

## MEMORANDUM

To: Sandra Lyon, SMMUSD Superintendent

From: ENVIRON International Corporation

Re: **Summary of Pre- and Post-Cleaning Polychlorinated Biphenyls (PCBs) Results for MHS Building B/C (Building 900, Whale Building)**

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This report is submitted to the Santa Monica-Malibu Unified School District (SMMUSD or District) to summarize the preliminary<sup>1</sup> results from pre- and post-cleaning sampling at Malibu High School (MHS), Building B/C (Building 900, Whale Building). This report also provides initial conclusions from the data pending a building-specific report summarizing inspection observations, sampling locations and results, and conclusions after receiving all validated data, as discussed in our [July 25, 2014 update](#) to the District.

### Executive Summary

The results show that PCB concentrations in **all** air and final post-BMP wipe samples taken in 7 regularly occupied rooms are lower than EPA's acceptable exposure levels, therefore the BMP cleaning was successful and no additional BMP cleaning in these regularly occupied rooms of Building B/C (administration building) is needed per the July 3<sup>rd</sup> MHS Specific Plan<sup>2</sup>:

- Based on review of all preliminary<sup>1</sup> air sample results, the results for MHS Building B/C show that **all** (10 samples) airborne levels of PCBs in the sampled rooms are either not detected or below USEPA's recommended health-based benchmark of 200 ng/m<sup>3</sup> including samples taken both before and after the cleaning of these areas.
- Based on review of all preliminary<sup>1</sup> post-BMP surface wipe samples results, cleaning in the regularly occupied rooms of Building B/C demonstrated that PCB concentrations in **all** final 33 surface wipe sample results are below USEPA's recommended threshold of 1 µg/100 cm<sup>2</sup>. ENVIRON understands that the District will clean several low-occupancy rooms in Building B/C before these areas are routinely accessed.<sup>3</sup>

Further information on the above-presented results is provided in the remainder of this memorandum.

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<sup>1</sup> Data are undergoing Level III/IV third party data validation, as described in the USEPA Contract Laboratory Program National Functional Guidelines (USEPA 2008).

<sup>2</sup> 2014. *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*. Prepared for SMMUSD by ENVIRON. July 3. [Accessed here](#).

<sup>3</sup> The low occupancy rooms that will be cleaned by the District include custodian room 903, electrical room 901, and telephone room 902.

## Additional Information on Preliminary Findings

### • **BMPs – Annual Cleaning for Building B/C (Building 900, Whale Building)**

- Annual HVAC cleaning has been completed by the District's contractor.
- Annual BMP cleaning of all high occupancy rooms has been completed by District staff.<sup>2</sup>

### **BMPs – Air and Wipe Sampling MHS Pilot Study on BMPs for Building B/C (Building 900, Whale Building)**

- Preliminary review and analysis of all air sample results<sup>1</sup> collected prior to and after BMP cleaning (with a greater number of post-BMP samples taken per the sampling protocol as indicated in the table below) indicates that **all** airborne levels of PCBs in the sampled rooms are either not detected or are below USEPA's recommended health-based benchmark of 200 ng/m<sup>3</sup>.
- Some of the light fixtures (mostly in the ballast compartment of the fixture) inspected in Building B/C exhibited visual evidence of past leakage. Some of these fixtures are in rooms where ENVIRON collected pre- or post-BMP cleaning air samples, but as noted below, all PCB concentrations in air samples were below USEPA's recommended health benchmark of 200 ng/m<sup>3</sup>, which suggests that past leak residues are not causing unsafe levels of PCBs in air. As discussed in our [July 11<sup>th</sup> update](#), at a minimum, SMMUSD will remove light fixtures with evidence of past ballast leaks within 360 days in accordance with the July 3<sup>rd</sup> MHS Specific Plan.

| <b>Preliminary<sup>1</sup> Air Sampling Results To Date</b> |                     |                                       |                                 |  |                                   |
|---|---------------------|---------------------------------------|---------------------------------|--|-----------------------------------|
| <b>Building</b>   | <b>BMP Cleaning</b> | <b>Number of Indoor Samples</b>       | <b>Not Detected<sup>4</sup></b> | <b>Detected and Below 200 ng/m<sup>3</sup></b> | <b>Above 200 ng/m<sup>3</sup></b> |
| Building B/C (Whale)  | Pre-BMP             | 3                                     | 2                               | 1<br>(84 ng/m <sup>3</sup> )                   | None                              |
|   | Post-BMP            | 7 (includes 1 duplicate) <sup>5</sup> | 1                               | 6<br>(maximum: 83 ng/m <sup>3</sup> )          | None                              |

- Preliminary review and analysis of all BMP surface wipe sample results<sup>1</sup> in Building B/C indicates that PCBs were not detected in nearly 75 percent (%) of pre-BMP and approximately 77% of the first round of post-BMP samples (note that a greater number of post-BMP samples were taken as indicated in the table below). **All** final surface wipe sample results were either not detected or are below USEPA's recommended threshold.
- Post-cleaning results that were assessed for further actions in accordance with Appendix D of the July 3<sup>rd</sup> MHS Specific Plan included the following:
  - One pre-cleaning surface wipe sample in Building B/C (Room 912D) had a total PCB concentration that was above USEPA's recommended threshold of 1 µg/100 cm<sup>2</sup>. Wipe

<sup>4</sup> The method reporting limit for air samples in Building B/C ranged from 68 ng/m<sup>3</sup> to 72 ng/m<sup>3</sup>.

<sup>5</sup> Duplicate samples are collected adjacent to the original sample. Replicate samples are collected in the same location as the original sample, after the original sample is collected and are applicable to wipe samples only.

samples were collected from this area following BMP-cleaning activities and the PCB concentration was found to be below the USEPA's recommended threshold so no further actions were needed.

- Four post-cleaning wipe samples in Building B/C (Building 900, Whale Building), which were obtained from areas that were not directly sampled prior to cleaning, had total PCB concentrations above USEPA's recommended threshold. The post-cleaning sample results were in less accessed areas (window sills and on top of a bookshelf) within the Attendance (Room 908) and Principal (Room 905) offices. The number of post-cleaning samples (26) was larger than the pre-cleaning samples (8). Also, the other 5 rooms tested after cleaning using a similar manner of sampling more areas after cleaning than prior to cleaning have post cleaning results all below the USEPA recommended threshold; thus indicating that Rooms 905 and 908 required additional cleaning as per Appendix D in the July 3<sup>rd</sup> MHS Specific Plan. This is likely related to more historical accumulations of dust in these less assessed areas that initial cleaning did not remove completely; a potential situation anticipated in the protocol as additional cleaning is the first step after a finding such as this.
- Given these results, the Rooms 905 and 908 were re-cleaned and cleaning effectiveness was further assessed by taking additional samples on more surfaces within these rooms: 6 additional surface wipe samples in Room 908 and 5 additional surface wipe samples in Room 905. The PCB results for this increased sample size after re-cleaning were either not detected or below USEPA's recommended threshold of 1 µg/100 cm<sup>2</sup>. At the conclusion of this summer's study, these rooms can be further evaluated for potential inclusion in future testing described in the July 3<sup>rd</sup> MHS Specific Plan.

| <b>Preliminary<sup>1</sup> Surface Wipe Sampling Results To Date</b> |                               |   |                                 |   |   |
|--|-------------------------------|---|---------------------------------|---|---|
| <b>Building</b>  | <b>BMP Cleaning</b>           | <b>Number of Samples</b>                                  | <b>Not Detected<sup>6</sup></b> | <b>Detected and Below 1 µg/100 cm<sup>2</sup></b> | <b>Above 1 µg/100 cm<sup>2</sup></b>    |
| Building B/C (Whale)   | Pre-BMP                       | 8<br>(includes 1 duplicate)                               | 6                               | 1<br>(0.85 µg/100 cm <sup>2</sup> )               | 1<br>(1.1 µg/100 cm <sup>2</sup> )      |
|  | Post-BMP                      | 26<br>(includes 1 duplicate and 1 replicate) <sup>4</sup> | 20                              | 2<br>(max: 0.28 µg/100 cm <sup>2</sup> )          | 4<br>(max: 2.2 µg/100 cm <sup>2</sup> ) |
|  | Post- BMP re-clean (905, 908) | 11<br>(includes 1 duplicate and 1 replicate)              | 6                               | 5<br>(max: 0.62 µg/100 cm <sup>2</sup> )          | None                                    |

<sup>6</sup> The method reporting limit for surface wipe samples is 0.10 µg/100cm<sup>2</sup> for all detected Aroclors and for total PCBs.