



August 6, 2014

Update from the Superintendent

**BUILDING A (ADMINISTRATIVE BUILDING) AND BUILDING B TO  
REOPEN FOLLOWING ENVIRONMENTAL TESTING**

The first phase of our environmental inspection, sampling and cleaning has been completed in Building A (Administrative Building) and Building B. 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 post-BMP wipe samples are below USEPA health standards criteria. Therefore, BMP cleaning was successful and no additional BMP cleaning in the high-occupancy rooms of Building A and Building B is needed. Based on this information, the District will reopen this area for school and community activities beginning August 7, 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.

August 6, 2014

## MEMORANDUM

To: Sandra Lyon, SMMUSD Superintendent

From: ENVIRON International Corporation

Re: **Summary of Pre- and Post-Cleaning Polychlorinated Biphenyls (PCBs) Results for JCES Building A (Administration) and Building B**

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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 in Building A (Administration) and Building B at Juan Cabrillo Elementary School (JCES). This report also provides initial conclusions from the data pending preparation of 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 wipe samples are below USEPA health-based benchmarks both before and after BMP cleaning. Since pre-cleaning sampling values were below USEPA thresholds, the results would indicate that BMP cleaning was not needed to address any residual PCB concentrations. Despite these results, the District proceeded with BMP cleaning of these buildings, and post-BMP cleaning testing indicates that no additional BMP cleaning in the regularly occupied rooms of Building A and Building B 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 JCES Building A and Building B show that all (14 samples, including all the classrooms in Building B) airborne levels of PCBs in the sampled rooms are not detected and therefore below USEPA's recommended health-based benchmark of 200 ng/m<sup>3</sup> as well as the 100 ng/m<sup>3</sup> benchmark for children aged 3 to <6 years old<sup>3</sup>, including samples taken both before and after the BMP cleaning of these areas.
- Based on review of all preliminary<sup>1</sup> surface wipe samples results for the regularly occupied rooms of Building A and Building B, PCB concentrations in all (36 samples) surface wipe samples are below USEPA's recommend threshold of 1 µg/100 cm<sup>2</sup> both before and after BMP cleaning. ENVIRON understands that the District will clean remaining low-occupancy rooms (electrical rooms and janitorial room) in Building A and (electrical room and bathroom/storage) in Building B before these areas are routinely accessed.

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

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<sup>1</sup> Data is 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> Note that a threshold of 100 ng/m<sup>3</sup> is recommended by USEPA for children 3-<6 years old. This threshold will be used for the sampled JCES classrooms known to be regularly occupied by children older than 3 and less than 6 years old. This applies to classrooms in Building B which contain both kindergarten and special education classes.

## Additional Information on Preliminary Findings

### **BMPs – Annual Cleaning for JCES Building A and Building B**

- Annual HVAC cleaning has been completed by the District's contractor.
- Annual BMP cleaning of all regularly occupied rooms has been completed by District staff. ENVIRON understands that the District will clean remaining low-occupancy rooms (electrical rooms and janitorial room) in Building A and (electrical room and bathroom/storage) in Building B before these areas are routinely accessed.

### **BMPs – Air and Wipe Sampling MHS Pilot Study on BMPs for JCES Building A and Building B**

- 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 not detected and therefore below USEPA's recommended health-based benchmark of 200 ng/m<sup>3</sup> as well as the 100 ng/m<sup>3</sup> benchmark for children less than 6 years old.<sup>6</sup>

<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 A (Administration)	Pre-BMP	1	1	None	None
	Post-BMP	3	3	None	None
Building B	Pre-BMP	3 (includes 1 duplicate) <sup>5</sup>	3	None	None
	Post-BMP	7 (includes 1 duplicate) <sup>5</sup>	7 <sup>6</sup>	None	None

- Preliminary review and analysis of all BMP surface wipe sample results<sup>1</sup> in Building A and Building B indicates that PCBs were not detected in 100 percent (%) of pre-BMP and approximately 97% of post-BMP samples (note that a greater number of post-BMP samples were taken as indicated in the table below). **All** surface wipe sample results were either not detected or below USEPA's recommended health-based threshold.
- No post-cleaning results required further actions in accordance with Appendix D of the July 3<sup>rd</sup> MHS Specific Plan.

<sup>4</sup> The method reporting limit for air samples in Building A and Building B ranged from 67 ng/m<sup>3</sup> to 73 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.

<sup>6</sup> Note that a threshold of 100 ng/m<sup>3</sup> is recommended by USEPA for children 3-<6 years old. This threshold will be used for the sampled JCES classrooms known to be regularly occupied by children older than 3 and less than 6 years old. This applies to classrooms in Building B which contain both kindergarten and special education classes.

<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>7</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 A (Administration)	Pre-BMP	2	2	None	None
	Post-BMP	8 (includes 1 duplicate and 1 replicate) <sup>4</sup>	8	None	None
Building B	Pre-BMP	5 (includes 1 duplicate) <sup>5</sup>	5	None	None
	Post-BMP	21 (includes 1 replicate) <sup>5</sup>	20	1 (0.13 µg/100 cm <sup>2</sup> )	None

<sup>7</sup> The method reporting limit for surface wipe samples in Building A and Building B is 0.10 µg/100cm<sup>2</sup>.