MONROE PUBLIC SCHOOLS
Learning for Life

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August 24, 2016

Jefferson Ketchel
Director, Environmental Health Division
Snohomish County Health District
3020 Rucker Avenue, Suite 104
Everett, WA 98201-3900

RE: Sky Valley Education Center Corrective Action Plan Update

Dear Mr. Ketchel,

As discussed via telephone on Monday, August 22nd, we are nearing completion in terms of addressing the eight items outlined in our Corrective Action Plan dated May 25, 2016. Outlined below are our activities to date and anticipated path to completing the items listed in that Corrective Action Plan.

Items 1-3: Fluorescent Light Fixtures – As we have previously informed you, the district has chosen to approach remediation, inspection, and re-testing of potentially contaminated fluorescent light fixtures in a fashion different than initially outlined in our May 25th plan.

As communicated in June, instead of continuing to attempt to clean the fluorescent light fixtures that once housed PCB containing light ballasts we are removing those fixtures and replacing them with new LED light fixtures. The district developed a scope of work for this activity and has awarded the work to McKinstry, a Seattle based full-service design, build, operate, and maintain firm specializing in mechanical, electrical, fire protection, and energy conservation.

All fluorescent lights that formerly contained a T-12 magnetic ballast will be removed from all of the buildings on the Sky Valley campus prior to August 31st. The vast majority have already been removed, and there are no longer any fixtures of that vintage in the Annex Building, Library/Pod Building classrooms, Band/Music room, Family and Consumer Science room, Gathering Space, or Small Gym. In fact, the only remaining light fixtures to be removed as part of this project are in the Library itself.

The Tech Building has had a lighting retrofit undertaken in prior years, and there are no fluorescent light fixtures of the older type in that structure. Likewise, the light fixtures in the Admin Building and Main Gym had also previously been preplaced with newer T-8 fixtures.

As previously agreed, confirmation wipe samples of fixtures found to be contaminated with PCBs is no longer pertinent or required given the wholesale replacement and appropriate disposal of such fixtures.

Item 4: Remediation of PCB Caulk – The district has contracted with NorthStar CG, LP, a national company with offices in Issaquah, specializing in demolition and hazardous materials abatement for this work. NorthStar has completed the removal of all interior PCB Caulk at Sky Valley and is finishing up with the exterior PCB caulk removal at this time. NorthStar has begun applying the two layers of epoxy encapsulant in all areas completed to date.

Confirmation wipe samples were taken of surfaces adjacent to the areas of removed PCB caulking within the Annex Building late last week, and the results came back today as "non-detectable." Additional adjacent surface wipe samples are being taken as work progresses.

Confirmation air samples have been taken in interior spaces of the Annex Building, with results due back Friday (August 26th). Additional confirmation air samples in other buildings on the Sky Valley campus are being taken today, and will be taken later this week and early next week, as this work is completed and the layers of epoxy encapsulant have been applied and have had time to cure.

Confirmation sampling has been slightly delayed due to the initial difficulty of obtaining the Sikarard 62 epoxy encapsulant approved by the U.S. EPA. It is only available from one distributer in California, and can only be shipped by freight due to the nature of its two chemical components.

A further delay was caused after NorthStar was successful in acquiring the first shipment of epoxy material; which apparently did not come with any written instructions or directions. A NorthStar employee mixed the entire batch of epoxy material, instead of a small batch. Unbeknownst to the individual there is only a 20 minute working time before the epoxy hardens to the point where it cannot be used. This necessitated ordering additional epoxy material, and resulted in another several days delay.

Item 5: Remediation of PCB Paint – Previously Satisfied as described in May 25 Corrective Action Plan.

Item 6: PBS Environmental Air Tests Positive for PCBs – New air samples have been taken by PBS Environmental in all areas of the Annex Building where previous sampling indicated the presence of PCBs in the air. This initial batch of confirmation air samples is due back on Friday (August 26th). Additional air sample results from other buildings on campus will be available next week.

It is likely that the latter group of samples will not be available on or before August 31st. However, all remediation of light fixtures will have been completed by the August 31st deadline, and we will also have confirmation prior to that date of the outcome of the remediation work conducted in the Annex Building, which with one exception was the only structure where previous air sampling resulted in PCBs found in the air.

Item 7 (listed in March 25th Corrective Action Plan as Item 8): Removal of Old Carpet – The carpet in the North Pod of the Library/Pod Building, in Room A (aka, Salmon Room) of the Annex Building, and in the Band/Music room and Family and Consumer Science room in the Gym/Music Building have all been removed. This work was undertaken by Walker Specialty Construction. New flooring materials are scheduled to be installed by the Beresford Company over the next few weeks, once confirmation testing shows that any space where PCB caulk was removed or where previous air samples indicated the presence of PCBs in the air, has been effectively addressed.

Item 8 (listed in March 25th Corrective Action Plan as Item 9): Housekeeping and Best Management Practices –The majority of the sub-items in this section of the plan have been addressed either in the May 25th Corrective Action Plan, or in subsequent communication. All items not previously addressed will be completed by the end of the work day on August 31st.

In summary, we have made very significant progress in addressing the items outlined in our May 25th Corrective Action Plan. Further, we will complete the abatement, remediation, and clean-up activities outlined in the plan on or before August 31st, with the exception of one or more groups of confirmation test results that have been delayed a several days by circumstances beyond our control.

Rest assured that we will not allow students, siblings, or parents to enter into spaces where there has been previous air testing indicating the presence of PCBs in the air, or into interior spaces in which PCB caulking was recently removed, until such time as the confirmation tests have been received and indicate that our cleaning and abatement activities have had the desired results.

Sincerely,

John A. Mannix
Assistant Superintendent, Operations

Cc: Dr. Frekrika Smith – Superintendent, Monroe School District No. 103
Devlin Piplic – Director of Facilities, Monroe School District No. 103
Karen Rosencrans – Director, Sky Valley Education Center
Michelle Mullin – PCB Coordinator, U.S. EPA Region 5
Kendall Moore – PCB Coordinator, U.S. EPA Region 10
Nancy Bernard – Washington State Department of Health