MONROE PUBLIC SCHOOLS
Learning for Life

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June 9, 2016

Jefferson Ketchel
Director, Environmental Health Division
Snohomish County Health District
Via email @ jketchel@snohd.org

Michelle Mullin
PCB Coordinator
U.S. EPA Region 10
Via email @ mullin.michelle@epa.gov

Kendall Moore
PCB Coordinator
U.S. EPA Region 5
Via email @ moore.kendall@epa.gov

Subject: Additional Information and Data
Corrective Action Plan for Sky Valley Education Center
351 Short Columbia Street, Monroe, WA 98272

Dear Mr. Ketchel, Ms. Mullin, and Mr. Moore:

This letter is respectfully submitted in response to the letter dated June 2, 2016 received from the Snohomish Health District, and to follow-up as outlined in the Sky Valley Corrective Action Plan submitted to the Health District and U.S. EPA Regions 5 and 10 on March 25, 2016.

Room A in the Annex Building was closed at the end of the school day on May 26, 2016 given that the more recent PCB air sample level for that space was above the 600 ng/m3 listed in the EPA's Exposure Levels for Evaluation of PCBs in School Indoor Air for students fifteen to nineteen years of age. Notification of the updated PCB air sample results, along with the closure of Room A, was provided to staff and parents that same afternoon. Room A has been unavailable to students and instructional staff beginning the following day.

Upon receipt of the Health District letter of June 2, 2016, both main entrances to the Annex Building and the entrances to Room 11 in the Library/Pod Building were posted with a copy of the latest Health District letter.

We believe in at least one instance your requirement goes beyond what the EPA intended in their guidance titled Exposure Levels for Evaluation of PCBs in School Indoor Air. Room 11 is well below the 300 ng/m3 outlined in the EPAs Exposure Levels for Evaluation of PCBs in School Indoor Air as acceptable for students age six and above. We believe this room could have remained at the previous "no one under six" standing outlined in your prior letter of April 25, 2016. However, we have complied with your requirement to prevent students under the age of twelve from utilizing this space none-the-less.

As stipulated in Item 2 – Inspection and Cleaning of Fluorescent Light Fixtures of the Corrective Action Plan for Sky Valley Education Center submitted on May 25, 2016, we have set a target date of July 15, 2016 for completion of the cleaning of all fluorescent light fixtures in all areas of the Sky Valley campus. This date was submitted primarily due to personnel difficulties experienced during our initial light fixture cleaning efforts. This information, along with the proposed completion date, was conveyed in our May 5th draft corrective action plan, and was also discussed during our May 10 and May 19 conference calls regarding our Corrective Action Plan.

The July 15 date allows us to fully utilize our limited maintenance staff for this remediation work as soon as school is over on June 17th, as well as provide time to hire contracted abatement professionals to complete the project should that prove necessary. Additionally, the light fixtures in the Office Building and Technology Building are newer fixtures that came with electronic ballasts. It is therefore primarily the Gum/Music Building that we are now working on. Unfortunately, that building is primarily high ceiling spaces requiring man lifts or scaffolding, which complicates our ability to clean light fixtures during non-school hours and conduct educational activities during the school day. It is imperative that we conduct this work after school is out for the summer. We are therefore unable to change this target deadline to June 9th and will continue to work toward the July 15th deadline listed in the Corrective Action Plan.

As outlined in Item 5- Remediation of PCB Paint of the Corrective Action Plan for Sky Valley Education center, submitted on May 25, 2016, it has been determined that the PCB containing paint located in the area known as the Gathering Place inside the Gym/Music Building is not the top layer of paint, and is also only 0.196 mg/kg in PCB content (less than 1/50th the 10 mg/kg EPA action level). Therefore, we understand this material to no longer require any abatement or remediation.

As specified in Item 9 – Housekeeping and Best Management Practices of the Corrective Action Plan for Sky Valley Education center, submitted on May 25, 2016, the school district has already completed an initial cleaning of the primary air mixing chamber of the unit-ventilators utilized at Sky Valley, and has also significantly improved the filtration of these systems. Additional work to complete the cleaning of all interior compartments of the unit-ventilators, including those that are not in the air pathway, is scheduled for completion by August 31, 2016.

As of this date I have confirmed with Karen Rosencrans, Program Director of the Sky Valley Education Center, that she has communicated to staff, students, and parents not to touch or come in contact with caulk around windows or doors or in seams of structural columns. Given that PBS Environmental is currently sampling and testing caulk – per our May 25 Corrective Action Plan, Item 4 – Remediation of PCB Caulk – to determine the extent of where the PCB containing caulk is located, we have informed staff and students not to touch or come into contact with any caulking material. (*See Attachment*).

Mold abatement, carpet removal, vinyl asbestos tile removal, and scraping of lead paint and re-coating of exterior surfaces such as covered walkways are all part of activities that are scheduled to be undertaken at the Sky Valley facility this summer. They are all targeted for completion by August 31, 2016.

We are not aware of any roof repair that is necessary at this time (no maintenance work orders submitted and no verbal reports during any recent rainfall). The roof has leaked at points in time, but repairs or roof section replacements have previously been undertaken to remedy them. The only situation we are aware of currently is a rooftop mounted heat pump that is inoperable, and had allowed moisture to pass through the mechanical equipment and enter the Office Building structure. The system has a tarp over it to prevent moisture intrusion until its scheduled replacement this summer. It is one of four heat pumps servicing the office and surrounding areas.

As outlined in the Corrective Action Plan for Sky Valley Education Center we are hereby providing the following additional documents and/or information:

- Documentation of the specific fixture location of all recently found PCB containing fluorescent light ballasts, or visual evidence of a prior FLB failure to be cleaned and confirmation tested (*see SVEC PCB Ballast Clean-up Map 06 02 2016*)
- PCB caulk Technical Specifications and suggested Epoxy Coatings for use in PCB caulk remediation (*see 02 84 00 PCB SVEC Technical Specification*)

Data and information supplied in response to Snohomish County Health Department letter of June 2, 2016:

- Documentation that all PCB containing Fluorescent Light Ballasts have been removed from the Sky Valley facility, and that they have been previously disposed of, or are currently properly stored for disposal in accordance with 40 CFR 761.65
    - PCB Ballast Assurance Letter from D. Piplic (*see Facilities Ltr re Storage of PCBs 060816*)
    - Hazardous Waste Manifest (*see SVEC PCB Ballast Disposal Documentation*)
    - Drum Spill Containment Pallet Invoice (*see Drum Spill Containment Invoice 03 29 2016*)

Additional documentation:

- Chain of Custody form, with lab results, for additional PCB caulk testing performed by PBS Environmental to quantify and locate areas of PCB caulk for remediation as outlined

in Item 4 – Remediation of PCB Caulk, of the Sky Valley Corrective Action Plan submitted March 25, 2016. (*see PBS PCB Caulk Additional Test Results 06 06 2016*)

PBS Environmental is currently working to quantify the PCB caulk that tested at or above the 50 ppm. PBS Environmental will also provide specific descriptions of the location of PCB containing caulk, and a map depicting the rough location of PCB containing caulk. This documentation will be utilized along with the Technical Specifications to seek bids for the PCB caulk abatement work. I will forward these documents to you as soon as they are available, most likely sometime this coming week.

One further note, a section of caulk came back as 49 ppm PCBs (line 28 of the attached additional PCB caulk test results). That material will be included in the PCB caulk remediation as it is within 10% of the 50 ppm threshold.

Respectfully,

John A. Mannix
Assistant Superintendent, Operations

Cc: Dr. Fredrika Smith, Superintendent
Karen Rosencrans, Director, Sky Valley Education Center
Devlin Piplic, Director of Facilities, Monroe School District No. 103
Nancy Bernard, Washington State Department of Health