

April 13, 2021

Via Electronic Mail

Ms. Amanda Cruz, PCBs in School Coordinator
USEPA Region IX
Land Division, LND-42
75 Hawthorne Street
San Francisco, CA, 94105

**RE: Removal of PCB Impacted Materials
Building G, Malibu High School, Malibu, CA**

Dear Ms. Cruz:

On behalf of the Santa Monica-Malibu Unified School District (SMMUSD or the District), Ramboll US Consulting, Inc. (Ramboll) is providing this letter to inform the U.S. Environmental Protection Agency (USEPA) Region IX of polychlorinated biphenyl (PCB) impacted (i.e., ≥ 50 parts per million [ppm]) building materials recently detected at Building G at Malibu High School (MHS). These PCB impacted building materials are proposed to be addressed by the District during planned demolition activities and are part of a larger effort to remove PCB containing building materials across the MHS campus.

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The purpose of this letter is to inform the USEPA of the specific areas at Building G with materials containing concentrations of PCBs ≥ 50 ppm. SMMUSD is currently planning to complete PCB abatement activities and demolition of Building G in the spring and summer 2021 during the time school is not in session. The PCB impacted materials are planned for removal as Bulk Product waste as allowed by the 2012 USEPA reinterpretation memo¹ and in accordance with 40 CFR 761.62, prior to or during demolition of Building G.

Summary of PCB Impacted Building Materials

Over the last several years in anticipation of planned renovation/demolition activities, NV5 (formerly Alta Environmental) conducted bulk sampling of flooring, wall varnish, and door caulk throughout Building G. PCBs were identified at ≥ 50 ppm in all three materials. These source materials and the immediately adjacent porous substrate (where present) will be removed for offsite disposal as PCB Bulk Product Waste, as allowed by the 2012 USEPA Memorandum re: PCB Bulk Product Waste Reinterpretation. Further description of each type of source material is provided below.

Mastic and Concrete Substrate

Several rounds of sampling were conducted in 2018 and 2020 that identified mastic and a felt layer under the flooring throughout Building G that contain PCBs ≥ 50 ppm,

¹ <https://www.epa.gov/pcbs/polychlorinated-biphenyl-pcb-guidance-reinterpretation>

as shown on **Figure 1**. PCB concentrations in these materials range from 70 to 271 ppm.

Subsequent sampling in 2021 of the underlying concrete slab identified PCB concentrations ranging from 0.26 to 10.1 ppm in the upper 0.5-inch of concrete, and concentrations >1 ppm to depths of up to 1-inch. As learned during the MHS Building D demolition project, removing the top layers of the concrete slab, and conducting additional confirmation samples can be time consuming, and difficult if reinforcing steel is encountered during removal. Due to the limited time frame and potential challenges of stripping off the upper layers of the concrete slab, the District plans to dispose of the entire slab thickness in these areas with the ≥ 50 ppm mastic attached as PCB Bulk Product Waste per the USEPA 2012 reinterpretation memo and in accordance with 40 CFR 761.62.

Wood Varnish Walls

Sampling was conducted in 2017 to evaluate the presence of PCBs in the porous substrate of walls adjacent to assumed ≥ 50 ppm door caulk. During this sampling, <1 ppm PCBs was not achieved in the substrate (i.e. wood paneling) at a typical distance (approx. 12 inches) laterally away from the caulk; as such, it was suspected that a source different than the door caulk was present. Additional sampling of the wood varnish (dark and light colored) on the walls in the classrooms confirmed that the varnish was a source of ≥ 50 ppm PCBs. Concentrations in the varnish samples ranged from 2.85 to 81.5 ppm and sample locations are shown on **Figure 2**. Given the impracticality of separating the wood varnish from the wood paneling, all of the varnished wood paneling in the classrooms will be removed in the northern portion of Building G, as shown on **Figure 2**, will be removed for offsite disposal as PCB Bulk Product Waste per the USEPA 2012 reinterpretation memo and in accordance with 40 CFR 761.62. The varnish sampling is detailed in the Alta Environmental Report titled *Source Bulk Sampling in Varnish Coatings, Building G*².

Door Caulk

In preparation for demolition of the building, caulk samples were collected in 2019 from the interior doors that were assumed to contain ≥ 50 ppm PCBs, as shown on **Figure 2**. The caulk samples identified PCB concentrations ranging from 0.638 to 246,000 ppm. The sampling is detailed in the Alta Environmental report titled *PCB Source Sampling Report, Remaining Door & Window Features, Buildings D, F, G, H, and I*³. Given the variable concentrations of PCBs in the door caulk, all of the door caulk in the northern portion of Building G, as shown on **Figure 2**, will be removed for offsite disposal as PCB Bulk Product Waste in accordance with 40 CFR 761.62.

CLOSING

In summary, based on the sample results from Building G, the District plans to remove all of the identified ≥ 50 ppm building materials and adjacent porous substrate per the USEPA 2012 reinterpretation memo for offsite disposal as PCB Bulk Product Waste in accordance with 40 CFR 761.62, which we understand does not require USEPA approval.

We would be pleased to answer any questions that you may have about this letter. If you have any questions or would like to discuss this further, please contact either one of us.

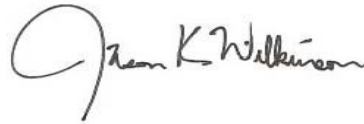
² <https://www.smmusd.org/cms/lib/CA50000164/Centricity/domain/4188/malibu-hs/VarnishSourceReport022018.pdf>

³ <https://www.smmusd.org/cms/lib/CA50000164/Centricity/domain/4188/malibu-hs/PCBSourceSampling022819.pdf>

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Daugherty', with a long horizontal flourish extending to the right.

Douglas Daugherty, PhD, CIH, PE
West Region COO, Americas

A handwritten signature in black ink, reading 'Jason K. Wilkinson', with a large initial 'J'.

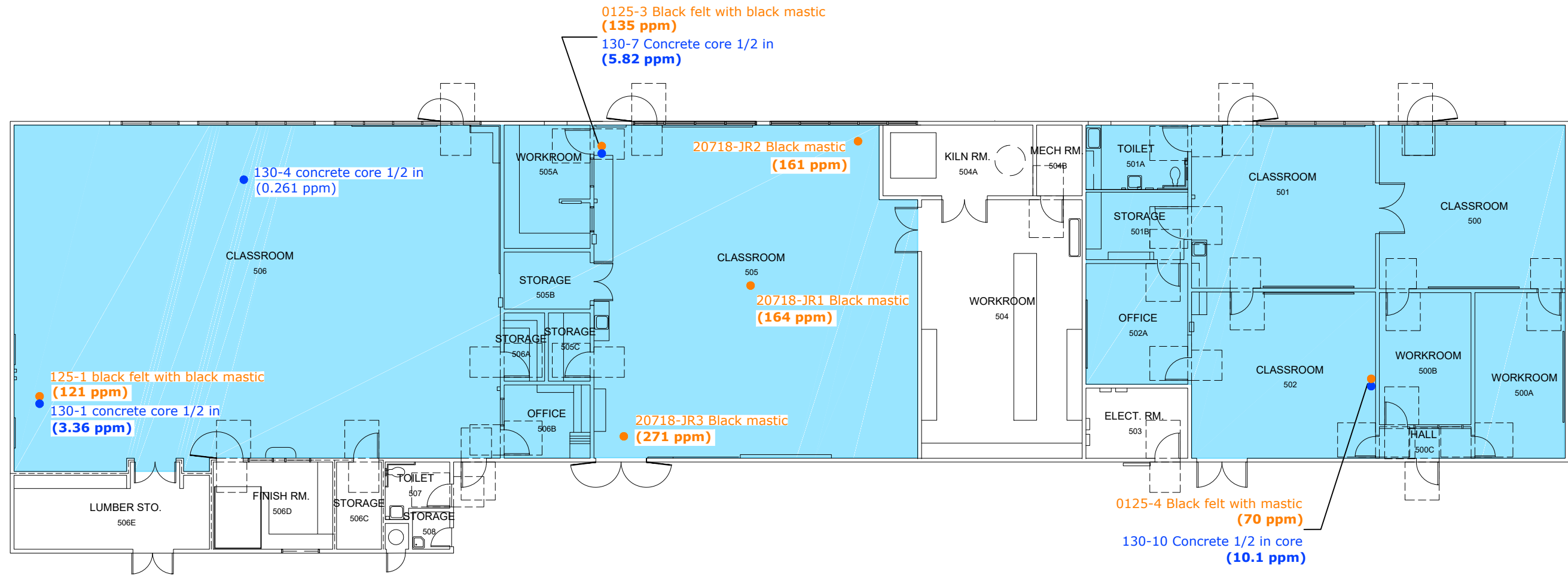
Jason K. Wilkinson, PG, LSP
Senior Managing Consultant


cc: Carey Upton, SMMUSD
Travis Hinman, Ramboll


Attachments:


- Figure 1 – Area of Flooring and Concrete Removal
- Figure 2 – Area of Caulk and Wall Removal

FIGURES



 AREA OF FLOORING AND CONCRETE TO BE DISPOSED OF AS BULK PRODUCT WASTE

 FLOORING SAMPLES

 CONCRETE SAMPLES

Notes

- BOLD CONCENTRATIONS EXCEED TSCA ACTION LEVELS.
- ROOMS THAT ARE NOT HIGHLIGHTED ARE BARE CONCRETE AND DO NOT HAVE FLOORING.

Source
 SAMPLE LOCATION MAP - BUILDING G, ALTA ENVIRONMENTAL, 02/2021.

**AREA OF FLOOR REMOVAL
 BUILDING G**

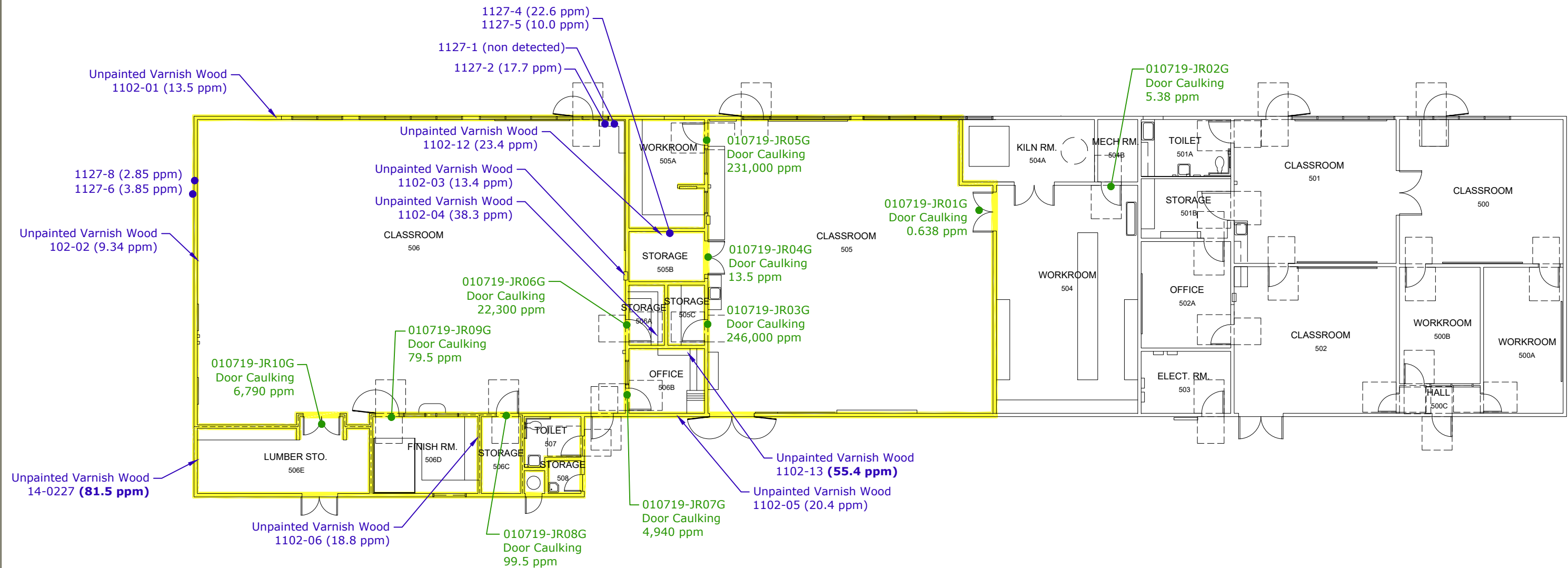


FIGURE 1

RAMBOLL US CONSULTING, INC.
 A RAMBOLL COMPANY

MALIBU HIGH SCHOOL
 30215 MORNING VIEW DRIVE
 MALIBU, CALIFORNIA





- AREA OF INTERIOR WALL AND DOOR CAULK TO BE DISPOSED OF AS BULK PRODUCT WASTE
- CAULK SAMPLES
- WOOD VARNISH SAMPLES

Notes
1. BOLD CONCENTRATIONS EXCEED TSCA ACTION LEVEL OF 50 ppm.

Source
SAMPLE LOCATION MAP - BUILDING G - PCB BULK SOURCE SAMPLING, ALTA ENVIRONMENTAL, 02/2019.



AREA OF CAULK AND INTERIOR WALL REMOVAL BUILDING G

FIGURE 2