District Performs a Secret Cleaning Before PCB Dust and Air Testing, Rendering Any Test Results Meaningless

(A response to the District's Press Release dated Dec 19th, 2014)

December, 26th, 2014

The PCB Christmas Break testing is a PR move by the district intended to reassure parents by first manipulating the cleanliness of the classrooms and then reporting that they are below EPA guidelines.

On Tuesday, December 16th, 2014, the district ordered a "special" cleaning of the classrooms prior to Environ testing the dust and air. They asked teachers to remove all items from all surfaces so they can send a "special" crew to remove dust from surfaces; the same surfaces that Environ will be wipe testing hours later. This renders PCB results meaningless. The goal of wipe and air testing is to see what the students and staff have been exposed to for the past 4 months. However, if they clean it hours before testing then any evidence of PCB exposure is removed.

This was done to guarantee the results are below EPA guidelines. Sadly, these test results will be nothing more than a PR move by the district to reassure parents and waste taxpayer dollars.

Last summer, Environ proposed a pilot study to evaluate the effectiveness of PCB Best Management Practices cleaning. If the district is interested in knowing what students and staff are being exposed to through-out the year, why not investigate and perform unannounced, random wipe and air tests, rather than secretly clean all the dust before testing?

EPA States Caulk Tested by Independent Parties Must Be Removed

Steve Armann, EPA manager Region 9 states the district **must remove all PCBs greater than 50 ppm in compliance with TSCA** and "this includes caulk tested by independent parties." (Click Here to Read)

The Oct 31st approval by the EPA was very clear: "EPA's included approval address (ONLY) the PCBs remaining in the substrate (known as PCB remediation waste) after PCB-containing caulk is removed at both schools." Meaning PCB sources must be removed and the sources that have contaminated other material (called PCB remediation waste) can be left in place until renovation occurs and levels in air and dust remain below guidelines. (Click Here to Read)

Rooms so far tested over 50ppm

MHS: 1, 3, 5, 7, 8, 205, 401, 505, 506, 704, Old Gym Office, library
JC: office, 18, 19, 22, 23

PCBs Affect a Whole Building, Not Just a Single Window

If PCB-laden caulking over 50ppm has been found in one classroom, then it is probable that PCB-laden caulk is in all classrooms in that building. It would be absurd to propose removal of only the tested window (which is what the district has proposed) when adjacent windows used the same caulking that contain high levels of PCBs.

Buildings that have already shown caulking exceeding 50ppm:
MHS A, B, C, D, G, I, F, Old Gym and JC buildings A C, F.

Up to now, there has been no source testing done in:
MHS building H, or JC: B, D, E.

BMP Cleaning is to Reduce Exposure: It is NOT Remediation

PCB over 50ppm must be removed. BMP and hand washing frequently is not a long-term solution to PCBs. It has been over one year and the district should have done a full evaluation of the extent of PCBs caulking. This is a $65 test per window/door. The air and dust testing is much, much more expensive.

The district stated that their results from June 2014 sampling program indicate that a frequency of one annual BMP cleaning is more than sufficient to reduce PCBs levels in dust and air. (The EPA has not validated this statement.) This statement made by the district poses two questions:
1. If this is true, then why would the district be doing a secret "special" cleaning hours before dust and air tests?
2. How can the district make this determination when they have only performed one yearly cleaning (summer 2014) and have no data validating how long the cleaning lasts?

EPA and TSCA are very clear, <u>PCBs must be removed, not managed in place.</u>

The district states that tests have consistently reported PCB levels that were non-detectable or below EPA health standards. This is just not accurate. Environ set their detection limit to 75ng, so when Environ says PCBS are non-detect, it **does not** mean there are no PCBs, just that they are under 75ng, still a significant amount.

Environ did not follow EPA Recommendation When Air Testing was Over Limit

The EPA states in their Aug 14th, 2014 letter to Sandra Lyon, that air testing is to be used to determine if there are PCBs present and then source testing is recommended to identify and remove PCBs in compliance with TSCA. Instead when tests came back over EPA guidelines, Environ re-cleaned classrooms multiple times (up to 3 additional times) until air tests were low and then deemed these rooms safe for occupancy. If 4 tests are taken and 3 don't pass, wouldn't that be an indication that there is a PCB source problem in that room that needs to be addressed?

The District is Spending an Outrageous Amount of Money to Distract Us
Everyone knows there are PCBs over 50ppm in the caulking. The levels have come back at some of the highest in the nation and the EPA has ordered the removal of PCBs including those from independent tests. The district is spending an outrageous amount of money to distract the public rather than face this head on, test and remove PCBs in compliance with Federal law. In the end, they will have to comply; the law is the law.

So the 2 million dollar question is, why spend over 2 million dollars with Environ doing "distraction" testing and Pillsbury Law firm rather than spend it to remove PCBs from our children's schools? Especially when the costs to remove PCB-laced caulking is estimated to be approximately $500,000.

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