



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

March 21, 2014

Sandra Lyon, Superintendent
Santa Monica Malibu Unified School District
1651 Sixteenth Street
Santa Monica, California 90404

Dear Superintendent Lyon:

EPA has completed its review of the "Limited Polychlorinated Biphenyl Remediation and Verification Sampling Report" (Verification Report) prepared by the Phylmar Group and dated February 2014. EPA finds that the data collection and quality assurance procedures were adequately implemented and consistent with the "Limited PCB Remediation, Verification Sampling Work Plan for Malibu High School / Middle School," (Work Plan) accepted by EPA on December 20, 2013.

EPA's findings are based upon review of the two documents as well as direct oversight of the sample collection on January 3, 2014. On January 3, 2014, EPA observed the air sample collection procedures and wipe sample collection procedures. In addition, EPA collected seven (7) independent wipe samples in close proximity to samples collected by the Phylmar Group. See below for a table summarizing the EPA and SMMUSD wipe sample results. All results are below the regulatory threshold of 10 ug/100cm². The difference in the reported results may be due to differences in the analytical methods, laboratories, and sampling methods. EPA collected the wipe samples using gauze while the Phylmar Group used filter paper. Furthermore, EPA analyzed the samples using EPA Method 8082 and Phylmar Group used EPA Method 1668. Both methods are acceptable and EPA expected variability in the reported results.

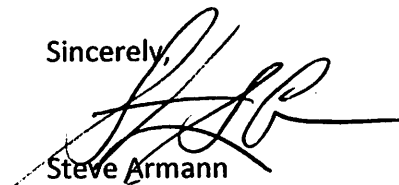
During EPA's review, we identified the following minor discrepancies or issues. These do not alter our findings.

- Section 4.2, Wipe Sampling Method and Results: The report states that wipe samples were collected using gauze or filter paper. EPA observed the contractor using filter paper only. Either filter paper or gauze is acceptable.
- Section 4.2, Wipe Sampling Methods and Results: This section does not report the collection or analysis of duplicate samples as specified in the Work Plan. However, based on our review of the Verification Report, the results of our own sampling, the

analytical methods used, and other information, we concluded that this omission does not limit the utility of the wipe sampling measurements.

If you have any questions, please feel free to contact me at 415-972-3352 or at Armann.Steve@epa.gov.

Sincerely,



Steve Armann

Manager, RCRA Corrective Action Office
Waste Management Division

cc: Thomas Cota, DTSC

Sample Locations and PCB Analytical Results. The EPA analysis was PCB Aroclors. The SMMUSD analysis was PCB congeners.

Sample ID	Room	Location	Surface Type	Area (cm)	EPA total PCBs, ug/100cm ²	SMMUSD total PCBs, ug/100cm ²
W-1A	library interior	windowsill	stucco	104 cm ² (6.5 x 16 cm)	0.6	0.275
W-1B	library exterior	windowsill	metal	102 cm ² (8.5 x 12 cm)	Not Detected (0.2)	0.0482
W-2A	Room 1 interior	windowsill	metal	100 cm ² (2 x 50 cm)	0.2 (estimated results)	0.0951
W-2B	Room 1 interior	floor	linoleum	100 cm ² (10 x 10 cm)	Not Detected (0.2)	0.0261
W-3A	Room 5 interior	windowsill	metal	100 cm ² (2 x 50 cm)	Not Detected (0.2)	0.0477
W-4A	Room 8 interior	windowsill	metal	100 cm ² (2 x 50 cm)	Not Detected (0.2)	0.025
W-5A	Room 301C interior	windowsill	metal	100 cm ² (10 x 10 cm)	3.6	1.83

* Note: When Not Detected above the laboratory quantification limit (QL). The laboratory QL is listed in parentheses.