



# Santa Monica Malibu Schools

November 17, 2013

Dear Malibu High School Staff,

I am pleased to inform you that the Malibu Schools Environmental Task Force met this weekend to review the first preliminary results of PCB air sampling tests conducted at Malibu High School late last month. We were encouraged by the preliminary results, which show that PCB levels throughout the school are well below the U.S. Environmental Protection Agency's (EPA) public health guidelines for schools.

[http://www.epa.gov/wastes/hazard/tsd/pcbs/pubs/caulk/health\\_levl.htm](http://www.epa.gov/wastes/hazard/tsd/pcbs/pubs/caulk/health_levl.htm) The group found this early data reading reassuring, as we await additional testing data that will be released later this week. The early data is a small part of our comprehensive effort to identify any potential risks and sources of contamination that may exist in our schools. The Task Force and its experts need to complete a more detailed review, as it was clear that while the overall levels of PCB's at the school fall well below risk guidelines, some individual congeners found (specific PCB's) will require further testing and will be part of any wide-ranging effort to assure the health and safety of all our staff and our school children.

The test results we reviewed are one of three key PCB tests, which include (1) airborne samples, (2) bulk samples and (3) wipe sampling. The two remaining areas of sampling will give us a better understanding of what might be the source of the PCBs. The bulk and wipe testing results are due to the District later this week and will be reviewed by the MSETF on Thursday. On our website and at the EPA.gov website you can find fact sheets about PCBs in schools. At this time, we cannot speculate as to the source of PCB's and we should have a better idea of what the source may be once we get the wipe and bulk sampling back.

<http://www.epa.gov/pcbsincaulk/pdf/caulkschools2.pdf>

The preliminary test results measuring airborne PCBs at Malibu High School were provided on Friday, November 15; I asked the group to meet this weekend to review these data and outline next steps before the beginning of the school week. The full Task Force is committed to review the incoming data and provide to our full school community timely information. I hope that you will join me in thanking this group for taking time, and with little notice, to meet on the weekend.

**Santa Monica-Malibu Unified School District**

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Board of Education: Ben Allen • Oscar de la Torre • José Escarce • Maria Leon Vazquez • Laurie Lieberman • Ralph Mechur • Nimish Patel  
Sandra Lyon, Superintendent

Because PCBs were commonly used in lighting ballasts (from the early 1970's thru the 1990's), that has been a source of PCBs in other schools and districts.

Although we knew our district had replaced ballasts in our schools, we did a complete re-inspection of all ballasts at MHS and confirmed that all ballasts at Malibu High School had been identified and replaced. This will also be done at Juan Cabrillo Elementary School.

The airborne PCB test results were conducted at Malibu High School, and, as planned, tests will be extended to Juan Cabrillo Elementary School. We want to ensure that the tests we conduct at Cabrillo give us useable data so that we can create the most effective plan for whatever remediation is indicated by the results.

Last week, we also received input on test results for Radon, EMF and CO2 that was conducted at both campuses. We did see slightly elevated CO2 levels in some classrooms; this we believe is due in part to larger class sizes, and ventilation issues in some of the older classrooms. We are taking immediate action, the first of which is to instruct our health and safety team to begin this week to identify an air balance technician who can work with us to determine what we need to do to address this issue. We are also seeking input from our executive team, principals and others at each site as to what can be done to improve ventilation and reduce CO2.

The complete action plan for recommended remediation will be posted to the website after this week, when all test data is received, reviewed and areas of concern, if any, are pin pointed. All test data will be posted to the website.

We know these issues have caused great stress and concern and we appreciate all you are doing to work with us as we determine next steps. We also know that people want immediate answers and complete plans. Please know that we will continue to work with the volunteers on the task force and consult experts at state and federal agencies who can give us guidance as we move forward.

Sincerely

A handwritten signature in cursive script, appearing to read "Sandra Lyon".

Sandra Lyon  
Superintendent



November 22, 2013

Message from the Superintendent  
Santa Monica Malibu Unified School  
Contact: Sandra Lyon, (310) 450-8338

#### UPDATE ON ENVIRONMENTAL TESTING

I want to provide our community an update on recent activities regarding our environmental testing in the Malibu Schools.

On Wednesday, November 20 and Thursday, November 21, SMMUSD staff had consultations with toxicologists and scientific experts from the US Environmental Protection Agency (Region 9), California Department of Toxic Substance Control, and the Los Angeles County Department of Public Health to review the preliminary test data from environmental testing at Malibu High School. In these meetings, EPA stated that initial review of the data confirmed there is "no acute health risk" associated with the findings and it safe to occupy the middle and high school classrooms. The majority of preliminary PCB tests show levels to be consistent with EPAs acceptable levels, even for residential settings, which are the most conservative thresholds, set by the Agency. EPA and the District also noted that a very small number of the preliminary tests which included bulk samples and wipe samples taken from caulk used primarily in window sills showed levels that are slightly above EPA guidelines. The agency stressed that it is important to understand that these so called "trigger levels" do not indicate any immediate health risk. Due to the small number of elevated results the school district, EPA, DTSC, LA County Health will now begin a collaborative process to develop a plan to do additional testing and immediate remediation to work towards eliminating any potential exposure to PCBs. The school district will be releasing all data as soon as it is summarized, compiled and reviewed by the lead environmental agencies and district officials. The district is committed to assuring that all its children are safe and secure and learning environments are healthy.

Thursday's meeting also included the Malibu Schools Environmental Task Force, which offered their analysis, recommendations for next steps, and to take questions. The following summarizes the key points addressed in these meetings:

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- The EPA said that PCBs measured in these preliminary tests pose no acute threat and it is safe to occupy the classrooms.
  - PCB levels were evaluated using the conservative *residential levels*, and even at this level the findings are within acceptable health ranges.
- The levels found in caulking around windows do exceed the allowable regulatory limit, which requires additional testing and a plan to (1) identify and (2) mitigate PCB contaminants found in our schools. As background, PCBs were used in public construction between 1950 – 1979 until banned by the federal government. Regulatory limits triggering the need to investigate and abate PCBs in caulking are different than health limits and are defined by the Toxic Substances Control Act.
- The EPA stressed that even when there is no immediate health issue, mitigation must take place if there is evidence that regulatory limits are exceeded.
- DTSC reviewed the District’s soil Removal Action Completion Report and observed that no airborne PCBs were detected and the soil concentrations did not represent a health hazard.

The preliminary environmental testing was limited to the rooms at Malibu High School that raised employees’ and parents’ questions. This first phase testing was intended to provide instructive data that would guide our next steps. At this time, I can confirm that our immediate next step will be to engage the EPA and DTSA to assist in creating a plan for additional analysis and site remediation.

At Thursday night’s meeting of the Board of Education, I recommended and the Board approved that we enter into a formal agreement with the EPA to outline necessary additional testing, a remediation plan at Malibu High School and Juan Cabrillo Elementary School to address the regulatory issues and to oversee peer reviews of data from our preliminary testing and the Arcadia reports, which contain details on the Malibu High School soils remediation performed in 2010.

### **My Observation**

Through this experience, I have become keenly aware that the EPA and other regulatory agencies are concerned with PCBs and intend, in my opinion, to work with our District to set a model for analysis and mitigation of these

contaminants, which were unfortunately used in the construction of public projects for nearly three decades. I am resolved to work cooperatively with these government agencies, to hire the experts who can properly and efficiently guide us, and to ask questions and seek answers on behalf of our entire school community.

A study session will be held on Thursday, December 12 at 5:30pm at the District Office where the Board of Education will receive my recommendations for additional, district-wide testing and remediation, which will be overseen by the government health authorities, recommendations for best practices facilities cleaning protocols, and a plan for increasing the District's communications capacity to better address the community's desire to receive timely information and updates.