



**Department of
Education**

Joel I. Klein
Chancellor

Kathleen Grimm
Deputy Chancellor

November 3, 2010

Ms. Diane Bush and Ms. Michelle Ciulla Lipkin
Co-Presidents, on behalf of the PS 199 Executive Board
PS 199M
270 West 70th Street
New York, NY 10023

Re: PCB Pilot Program at PS199M

Dear Ms. Bush and Ms. Ciulla Lipkin:

We received your letter dated October 20, 2010, concerning PCB testing, monitoring, and remediation at PS 199M under the EPA Pilot Program. We plan to present the latest air test results and action plan at the meeting scheduled for Thursday, November 4, 2010, but we have responded to your specific requests by item number in this letter.

We understand your concern for the safety of your children so please be aware that the New York City Department of Health and Mental Hygiene has advised that the reported PCB levels at your school do not create an immediate health risk. EPA guidance levels are based upon a very conservative analysis containing a large margin of safety that is protective of the public health. The most recent air test results indicate improving conditions in the building and the PCB levels in the first floor classrooms have decreased to a range of 180-218 ng/m³.

1, 2, and 5. Although we appreciate your position about PCBs in outdoor building materials, the pilot program with the EPA focuses predominately on conditions in the classroom environment and, consequently, potential interior sources of PCBs. Residual exterior sources of PCBs, if any, are not likely to be a contributing factor to indoor air quality. The dust wipe samples in the classrooms, even on the first floor, have all been below the EPA standard. This indicates that dust or other residue from possible outside building materials is not a source. The SCA will monitor interior encapsulated surfaces for migration of PCBs.

3 and 8. The SCA's action plan that will be discussed with the PTA this Thursday calls for the removal of interior caulk and other material containing PCBs greater than 50 ppm in those areas where air tests results remain over EPA guidance levels.

4. With respect to the soil adjacent to the building, we are preparing an action plan, for approval by the EPA, to remediate the few spots where PCB concentrations were slightly above the standard of 1 ppm. This work will be performed next summer.

6. In addition to air tests, over 750 samples of approximately 200 bulk materials have already been taken and the results will be posted on-line shortly. Some materials have been found to contain PCBs exceeding 50 parts per million (ppm). However, the concentrations are low compared to the leaking ballasts in the fluorescent lighting fixtures that have been removed and replaced and the interior caulk that has either been removed or encapsulated. These building materials will be further addressed in the action plan that we will present this Thursday.

7. We are exploring ways to improve ventilation in the building and will provide possible alternatives on Thursday. One recommendation that can be implemented immediately is to operate the roofing exhaust fans at all times. This has already been discussed with the Division of School Facilities (DSF). In addition, opening, even slightly, a window or two during the day (if not uncomfortable for teachers and students) or in the evening in each classroom would be helpful in facilitating air exchange. Other possible mechanical methods that we are investigating that may increase ventilation will be discussed at Thursday's meeting.

9. We will continue to conduct air tests appropriate for each of the seasons as we have done for the past two years. During the last two rounds of testing, which were conducted during the summer and fall, the windows were open and the exhaust fans were operating. The SCA is planning to conduct additional air tests over the Thanksgiving holiday in these classrooms as well as other spaces in the building where prior results were below guidance to ascertain whether there has been any upward fluctuation. We have already committed to another round of air testing this winter during which windows will be closed. Due to the disruption and noise that air testing may cause, we will continue to undertake this effort when the school is not occupied.

We have provided the PTA with written test results over the past two years. In addition to posting test results on the SCA website, we will assemble these results and provide a package to the PTA as well.

10. Lastly, you requested scientific documentation as to the effectiveness of encapsulation as a remedial measure. This research is in its formative stages and, for this reason, encapsulation was approved by the EPA for study in the pilot program. Although results at PS 309K have been encouraging, we will develop additional data about encapsulation for evaluation with the EPA as we continue to implement the work plan.

The DOE/SCA is committed to its collaboration with EPA, and specifically, the efforts to reduce potential PCB exposure at PS 199M. We look forward to meeting with the school community this Thursday and appreciate your interest and concern.

Sincerely,



Kathleen Grimm

cc: Ross J. Holden