

PTA PARENT TEACHER ASSOCIATION OF
THE JESSE ISADOR STRAUS SCHOOL

270 WEST 70TH STREET NEW YORK, N.Y. 10023

www.ps199pta.org

October 20, 2010

Department of Education
Deputy Chancellor Kathleen Grimm
52 Chambers Street
New York, New York 10007

School Construction Authority
Ross Holden, Esq.
30-30 Thomson Avenue
Long Island City, New York 11101

RE: PCB remediation, testing and monitoring at PS199

Dear Deputy Chancellor Grimm and Mr. Holden:

Thank you for meeting with our staff and parent body on October 5, 2010 to discuss the PCB levels at PS199. While we appreciate the efforts being made to ensure that PCB levels are in accord with EPA standards, we remain deeply concerned that efforts to date have not been able to achieve that objective. Parents repeatedly ask us if their children are safe, how long their children can attend school in classes with levels way in excess of EPA standards and what is being done to fix this problem. We are seriously troubled by comments of late that continue to stress that "short-term exposure" to PCB contaminated air is not problematic, when the exposure facing our community has been over a period of years, not months or days. The PTA does not have answers to the question of "how long is too long" but the New York City Department of Education and the School Construction Authority are charged with answering this question and must do so with human health at the forefront of the analysis.

As was indicated at the 10/5/10 meeting, the airborne level of PCBs in a number of classrooms and the gym currently exceed EPA "Public Health Levels." Most of these classrooms have PCB concentrations in the air that are not just slightly above the EPA's "Public Health Levels" but are 400 to 500% above these levels.

After reviewing PS199's history on this issue, speaking with several experts on PCBs in building materials and hearing your presentation, we make the following requests on behalf of the PS199 community and ask that the following action items be undertaken immediately. In all cases in which bulk sampling is undertaken as per the following requests, we request that split samples be taken so that the PTA can have one set of the materials independently analyzed.

P.S. 199

- 1) Test all new caulk to determine if PCBs have seeped back into the caulk and remove if necessary.
- 2) Test brick that was adjacent to old caulk to determine if PCBs have migrated to these substances and remove if necessary.
- 3) Remove contaminated caulking around doorframes in the interior of the building.
- 4) Test soil around the entire building and remediate as necessary, with special emphasis in the areas around the first floor classrooms that have the highest PCB air contamination levels. As you know, soil at PS199 was remediated/removed years ago and the new soil has become re-contaminated.
- 5) Test other outside building materials that may be washing PCBs into the soil and remediate if necessary.
- 6) Test inside building materials, such as tiles and the mastic used in tiling, and remove these materials if found to be contaminated with PCBs.
- 7) Improve ventilation in the school building immediately.
- 8) After testing, move quickly to remove all confirmed sources of PCBs from the school building and grounds.
- 9) Perform air monitoring on a monthly basis and perform it under normal operating conditions, with most or all windows closed and with the exhaust fans off and while school personnel are present. Please furnish preliminary verbal and written results to parents as soon as they are available, including the results applicable to testing done Oct. 11. Please also provide written results of all tests performed at PS199 within the last three years.
- 10) Provide the scientific documentation demonstrating that encapsulation is an effective remediation strategy for PCB contamination.

We must emphasize our concern that the testing that has been undertaken to date has not been done under routine school conditions. The school has been heavily ventilated prior to testing and testing is being performed with all of the windows open. These conditions would seem to artificially lower the numbers (a fact that makes the existing levels even more of a concern). Moreover, the past testing conditions are not representative of the actual conditions that will exist in the school in a few weeks when the cold weather is upon us, when school windows are closed and the exhaust system is not being used to pull in outdoor (colder) air.

We urge you to expeditiously remedy the situation at PS 199, and then to conduct long term and regular monitoring of the building. Our community simply cannot wait until next summer for further remediation efforts.

In light of the anxiety and health concerns our community has, we request a written response to our letter within seven days. Please respond specifically to each of our enumerated requests.

Sincerely,



Diane Brush
PTA Co-President



Michelle Ciulla Lipkin
PTA Co-President

CC: Vinicius Castagnola, NYCSCA
Joel Klein, Chancellor, NYC Dept. of Education
Assembly Member Linda Rosenthal
Council Member Gale Brewer
New York State Senator Tom Duane
Representative Jerrold Nadler
Lisa P. Jackson, EPA Administrator
Judith Enck, Regional Administrator, Environmental Protection Administration
US EPA Region 2
Michael McCourt, UFT
Katy Rosen, Principal PS199
Theresa DiCristi, Custodial Engineer PS199