



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SEP 26 2018

North Stonington Public Schools
Attn: Peter Nero, Superintendent
311 Norwich-Westerly Road
North Stonington, Connecticut 06359

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
and § 761.79(h)
North Stonington Elementary School
North Stonington, Connecticut

Dear Mr. Nero:

This is in response to the Notification¹ by the North Stonington Public Schools ("NSPS") for approval of a plan to address polychlorinated biphenyl (PCB) contamination at the North Stonington Elementary School, 311 Norwich-Westerly Road in North Stonington, Connecticut. Specifically, PCBs have been identified in paints, caulk, mastics, building substrates (e.g., concrete and brick), and ground surfaces located in/adjacent to the circa-1965 and 1968 sections (together and hereinafter "the Site") of the school at concentrations that exceed the allowable PCB levels under 40 CFR § 761.20(a) and § 761.61(a).

To-date, NSPS has implemented interim measures to reduce the risk of exposure to PCBs for building users that include the following:

- Cleaning *non-porous surfaces* (e.g., table surfaces and window sills);
- Closing rooms with PCB concentrations that exceeded the EPA's "Exposure Levels for Evaluating PCBs in Indoor School Air";

¹ The notification was prepared by Eagle Environmental on behalf of the NSPS to satisfy the requirements under 40 CFR §§ 761.61(a) and (c) and § 761.79(h). Information was submitted dated March 10, 2011 (Self-Implementing On-Site Cleanup and Disposal Plan For PCB-Containing Exterior Window Caulk); December 7, 2016 (Limited Source Sampling Report); December 30, 2016 (Haz-Mat Inspection Report); May 22, 2017 (PCB Remediation Action Plan School Modification Project); July 18, 2017 (PCB Wipe and Settled Dust Sampling Plan for Determination of PCB Surface Concentrations North Stonington Elementary School); August 18, 2017 (PCB Air, Wipe, and Dust Sampling and Analysis Report); September 27, 2017 (PCB Remediation Action Plan School Modification Project Revision 1 and Response to EPA Comments); September 29, 2017 (Additional PCB Air, Wipe and Bulk Sampling and Analysis Report); June 6, 2018 (PCB Remediation Action Plan School Modification Project Revision 2); August 2, 2018 (email quarterly (July 2018) sample results); and September 13, 2018 (email third quarterly air sampling results). These submittals together shall be referred to as the "Notification".

- Removing PCB-contaminated carpeting and door mats;
- Encapsulating painted surfaces and caulk; and,
- Collecting air, surface, and dust samples for PCBs.

The Notification proposes a PCB plan under 40 CFR §§ 761.61(a) and (c) and § 761.79(h) in which NSPS will remove or encapsulate PCB-containing building materials (i.e., caulk, paint, and mastics) and associated substrates (e.g., brick and concrete) and PCB-contaminated ground surfaces to achieve a PCB cleanup standard of less than or equal to (“≤”) 1 part per million (ppm). Structural *porous surfaces* will be encapsulated. A summary of the PCB remediation activities to be implemented at the Site is provided in Attachment 2.

Based on its review of the information provided in the Notification, EPA has determined that the Notification meets the requirements under 40 CFR § 761.62 and § 761.79(h) for the PCB-containing building materials (e.g., caulk and paint) and 40 CFR § 761.61(a) for building substrates and ground surfaces. EPA finds that the proposed encapsulation of structural *porous surfaces* should effectively prevent direct exposure of these PCB-contaminated surfaces to building users such that PCBs remaining at the Site will not pose an unreasonable risk of injury to health or the environment, provided the encapsulates, and secondary barriers, as applicable, are maintained. EPA may approve the encapsulation under § 761.61(c).

EPA has determined that the alternative sampling frequencies, as shown in Attachment 2, will be adequate to confirm that the PCB cleanup standard has been met, based on the results of the PCB sampling to-date and the proposed decontamination and removal procedures. EPA finds that the alternative sampling frequencies proposed by NSPS will not create an unreasonable risk of injury to health or the environment and EPA may approve the sampling under § 761.61(c).

NSPS may proceed with its plan in accordance with 40 CFR §§ 761.61(a) and (c) and 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1. NSPS has indicated in its Notification that the school will remain in use until approximately March 2019 when the school will be vacated to allow for the remediation and subsequent renovation work. During this interim period, NSPS shall continue to conduct indoor air and surface sampling to ensure that there is no unreasonable risk of injury to building users from the PCBs at the Site. In the event EPA determines that the PCBs at the Site present an unreasonable risk of injury to building users, NSPS shall be required to implement any measures necessary to reduce such risk, including but not limited to, removal of the PCB-containing products and/or ground surfaces.

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-16 (Guide) for work conducted under this Approval and the Notification. Greener Cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process dated May 2016. (See www.astm.org/Standards/E2893.htm for additional information). EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report (see Attachment 1, Condition 28) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site, otherwise available to the EPA under Section 6 of TSCA, 15 U.S.C. 2605, 40 CFR Part 761, or other provisions of federal law. This Approval does not waive or relieve NSPS from complying with applicable TSCA and other federal, state, and local regulations and permits.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall consider this project complete only when it has received all submittals required under this Approval, including submittal of the long-term monitoring and maintenance plan and the recorded deed notice. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



Bryan Olson, Director
Office of Site Remediation & Restoration

cc Gary Trombly, CTDEEP
John Terrill, Eagle Environmental
File

Attachment 1: PCB Approval Conditions (8 pages)
Attachment 2: PCB Remediation Summary Table (7 pages)