June 23, 2014

Mr. Bernard P. Orlan
Director, Environmental Health & Safety
New York City Department of Education
44-36 Vernon Blvd., 3rd Floor
Long Island City, NY 11101

Re: PCB Wipe Sampling Report
P.S. 41M
Cardno ATC Project: No. 42672.5063
Work Order No. 00541735 04

Dear Mr. Orlan:

Cardno ATC was retained by NYC-DOE to perform a limited PCB wipe sampling inspection at M041 located at 116 West 11th Street, New York, NY 10011. The inspection was performed by Mr. Ricardo Vilchez on June 20, 2014 and it was limited to wipe samples collection and analysis within Room #309 to determine if any surface was contaminated with PCB, following the removal of failed T-12 light fixture ballast. The light fixture ballast was removed by Triumvirate Environmental, a hazardous waste management contractor retained by NYC-DOE to provide removal and clean up services.

BACKGROUND

Polychlorinated biphenyls are a group of man-made chemicals that can cause a number of different harmful effects. PCB's are either oily liquids or solids and are colorless to light yellow. There are no known natural sources of PCB's in the environment. PCB's were used mainly in making electrical transformers, capacitors and other heat transfer devices but some were also used in building materials.

PCB's may be present in older fluorescent light fixtures in any school building that had fluorescent lights installed before 1979 and never had a lighting upgrade. The ballast is a transformer inside the light fixture that is not accessible unless the light is disassembled. PCB's are contained within the light ballasts' capacitors and in the ballasts' potting material (a black tar-like substance used to protect the capacitor). As the ballast ages, it can overheat causing a burning or smoky odor or in some cases, causing tar from the potting material or oil to drip from the fixture.

Indications of leaking PCB ballasts may include the presence of an oily film on the metal casing, a leaking putty-like compound (the potting material), or discoloration of the metal casing. Other leaking signs include drips, buzzing, and discoloration of the light ends. Almost all ballast casings are a single color (often black or white) with a contrasting label. Leaks, when present, are usually found around the metal seams of the casing. Indications of burning PCB ballast may include: an acrid and burning tar odor; melted tar oozing from the casing seams; and visible electrical lead bushings. It is very rare for PCB ballasts to actually catch on fire.

Evaluation Criteria for PCB Spills

PCB manufacture, use, storage and disposal are regulated by U.S. EPA under TSCA and Part 761, Title 40 of the Code of Federal Regulations (40 CFR Part 761). TSCA regulates any materials or wastes that contain PCBs at concentrations of 50 ppm (parts per million) or greater. Light ballasts containing PCB oil in the small capacitor or the potting compound are included in this regulation. Leaking PCB ballasts are regulated as hazardous wastes and toxic substances. Proper handling and cleanup of leaking PCB ballasts is necessary to protect public health and the environment. TSCA regulates disposal of PCB wastes with concentrations over 1 ppm. Leaking PCB light ballasts often generate wastes in excess of 1 ppm. In addition, PCBs are regulated under TSCA if an impervious surface shows 10 micrograms (ug) per 100 square centimeters (cm^2) of PCBs. Examples of this in the classroom are the surfaces of floors, desks, and bookcases.

PCB WIPE SAMPLES

Cardno ATC collected a total of three (3) samples (two surface samples and one blank) within Room #309 and subsequently sent them to New York Environmental and Analytical Labs., Inc. for analysis via EPA 8082 Method. All samples were obtained in accordance with EPA 40CFR 761.123 and NYC-DOE "*PCB Light Ballasts Wipe Sampling Protocol*" and included using a 10x10 cm template to outline the sample area and a sterile gauze pad wetted with hexane or reagent grade acetone to collect the sample. The hexane or reagent grade acetone wetted pad was used to wipe the area outlined with the 100 cm^2 template or the measured area if the area is an irregular surface. The area was wiped completely twice, from left to right and then from top to bottom. For waxed surfaces such as floors the wetting agent used is de-ionized water or distilled water because solvents used on waxed surfaces will not give an accurate analysis for PCB's. The wipe media was then inserted into a 6 ounce sterilized glass vial and delivered to the laboratory.

The following table summarizes the inspection results:

Table 1.0 PCB Wipe Sample Results (after ballast removal)

Sample Id. No.	Location	Type of Surface Sampled	Sample Media	Detection Limit (ug/cm^2)	Result (ug/cm^2)
01	Blank	Blank	Gauze Pad w/ deionized water	3	<3
02	Room #309	Student's Table Top (x=13, y=6)	Gauze Pad w/ deionized water	0.03	<0.03
03	Room #309	Floor- 9x9 gray VFT (x=15, y=6)	Gauze Pad w/ deionized water	0.03	<0.03

CONCLUSIONS

Wipe samples obtained from table and floor within Room #309 show PCB concentrations to be below detection limit.

Cardno ATC is pleased to be of service to the New York City Department of Education. Please feel free to contact us at (212) 353 8280 ext. 268 if you should have any questions or comments concerning this report.

Cardno ATC

Mike Balota
Project Manager

Appendixes: A- PCB Data and Chain of Custody Forms
B- PCB Analytical Results
C- Laboratory Certifications
D- NYC DOE Work Order Request

APPENDIX A

PCB DATA AND CHAIN OF CUSTODY FORMS

Cardno ATC
Shaping the Future

BATCH NO. 46620

PCB WIPE SAMPLING COC

PROJECT INFORMATION

1. Client:	2. Project Name: PS-041M	3a. ATC Project No.: 42672.5063	4a. Project Manager: Dragos Balota
NYC-DOE	2a. Project Address: 116 W 11TH ST, NY, NY 10011	3b. Task No.: 0001	4b. Inspector: Ricardo Vilchez

5. Date:	6. Building Name:	8. Turnaround Time:	9. Comment s (Field)
06-20-14	7. Location: Room # 309	RUSH (6 hours or less)	Analyze all samples via 8082 Method.

WIPE SAMPLE LOCATION

10. Sample ID No.	11. LAB ID No.	12. Room No.	13A. Surface Sampled	13B. Sample Coordinates (x and y)	14. MEDIA	15. Area Sampled (cm²)	16. MDL (ug/ cm²)	16A. RESULT (ug/ cm²)
309-01	-	309	BLANK	-	Gauze Pad ~~w/ Hexane~~ w/ DEION WATER	-	3 ug	< 3 ug
309-02	-	309	STUDENT'S TABLE TOP	x → 13' y → 6'	GAUZE PAD W/ DEION WATER	100	0.03	< 0.03
309-03	-	309	9"x 9", GRAY, VINYL FLOOR TILE	x → 15' y → 6'	GAUZE PAD W/ DEION WATER	100	0.03	< 0.03

C4130
2492436

CHAIN OF CUSTODY

17. Relinquished By	18. Date	19. Time	20. Received By	21. Date	22. Time	23. Method of Submittal	
I. RICARDO VILCHEZ	6-20-14			6-21-14	0800	Field	
						Walk In	✓
II.						US Mail	
						Fed-Ex	
III.						Other	

LABORATORY INFORMATION

24. Name and Signature:	25. Date	26 Time	27. Comments:
24a. Analyzed By:			Please email results to dragos.balota@cardno.com
24b. Analyzed By:			
24c. QC By:			

APPENDIX B

PCB ANALYTICAL RESULTS

NEW YORK ENVIRONMENTAL

88 HARBOR ROAD
PORT WASHINGTON, NY 11050
(516) 944-9500 • FAX (516) 944-9507
www.nyenvironmental.com

CLIENT:	Cardno ATC 104 E. 25 St. 10th fl. New York, NY 10011	**REPORT NO.** **PROJECT NO.**	2142436 40620
		SAMPLED: **RECEIVED:**	06/20/14 06/21/14
PROJECT:	M041 – 42672.5063 116 West 11th Street, Manhattan NY	**ANALYZED:** **REPORTED:**	06/21/14 06/23/14

ANALYTICAL REPORT

PCB WIPE

GC/ECD (EPA METHOD 8082A/3550C)

COMPOSITED SAMPLE ID: **01**
MATRIX: **SURFACE WIPE**
SAMPLE LOCATION: **BLANK**

BATCH NO.: **C4130-1**

TYPE OF PCB	CAS NO.	RESULT (ug)	MINIMUM DETECTION LIMIT (ug)
PCB 1016	12674-11-2	<3	3
PCB 1221	11104-28-2	<3	3
PCB 1232	11141-16-5	<3	3
PCB 1242	53469-21-9	<3	3
PCB 1248	12672-29-6	<3	3
PCB 1254	11097-69-1	<3	3
PCB 1260	11096-82-5	<3	3

NICOLE CHEUNG
CHEMIST

LI TSANG
LABORATORY DIRECTOR

Analytical results contained in this report relate only to the samples tested in the condition received by the laboratory. The report must not be reproduced except in its entirety unless with the laboratory's written approval. This report must not be used in any way to claim product endorsement by New York Environmental or ELAP of NYSDOH.

NYSDOH ELAP #: 11510

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ANALYTICAL REPORT

PCB WIPE

GC/ECD (EPA METHOD 8082A/3550C)

COMPOSITED SAMPLE ID: **02** BATCH NO.: **C4130-2**
MATRIX: **SURFACE WIPE**
SAMPLE LOCATION: **Room 309 (Students Table Top)**

TYPE OF PCB	CAS NO.	RESULT (ug/cm^2)	MINIMUM DETECTION LIMIT (ug/cm^2)
PCB 1016	12674-11-2	<0.03	0.03
PCB 1221	11104-28-2	<0.03	0.03
PCB 1232	11141-16-5	<0.03	0.03
PCB 1242	53469-21-9	<0.03	0.03
PCB 1248	12672-29-6	<0.03	0.03
PCB 1254	11097-69-1	<0.03	0.03
PCB 1260	11096-82-5	<0.03	0.03

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PROJECT:	M041 – 42672.5063 116 West 11th Street, Manhattan NY	**ANALYZED:** **REPORTED:**	06/21/14 06/23/14

ANALYTICAL REPORT

PCB WIPE

GC/ECD (EPA METHOD 8082A/3550C)

COMPOSITED SAMPLE ID: **03** BATCH NO.: **C4130-3**
MATRIX: **SURFACE WIPE**
SAMPLE LOCATION: **Room 309 (9x9 Gray Vinyl Floor Tile)**

TYPE OF PCB	CAS NO.	RESULT (ug/cm^2)	MINIMUM DETECTION LIMIT (ug/cm^2)
PCB 1016	12674-11-2	<0.03	0.03
PCB 1221	11104-28-2	<0.03	0.03
PCB 1232	11141-16-5	<0.03	0.03
PCB 1242	53469-21-9	<0.03	0.03
PCB 1248	12672-29-6	<0.03	0.03
PCB 1254	11097-69-1	<0.03	0.03
PCB 1260	11096-82-5	<0.03	0.03

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CHEMIST

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 NYSDOH ELAP #: 11510

APPENDIX C

LABOARTORY CERTIFICATIONS

COPY COPY COPY

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2015
Issued April 01, 2014

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. LI TSANG
NY ENVIRONMENTAL AND ANALYTICAL LABS INC
08 HARBOR ROAD
PORT WASHINGTON, NY 11050

NY Lab Id No: 11510

is hereby APPROVED as an Environmental Laboratory in conformance with the National Environmental Laboratory Accreditation Conference Standards (2003) for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved analytes are listed below:

Characteristic Testing

TCLP	EPA 1311

Polychlorinated Biphenyls

PCB-1016	EPA [illegible]
PCB-1221	EPA [illegible]
PCB-1232	EPA [illegible]
PCB-1242	EPA [illegible]
PCB-1248	EPA [illegible]
PCB-1254	EPA [illegible]
PCB-1260	EPA [illegible]

Sample Preparation Methods

	EPA 3630C

STATE OF NEW YORK
DEPARTMENT OF HEALTH

Serial No.: 50889

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APPENDIX D

NYC DOE WORK ORDER REQUEST