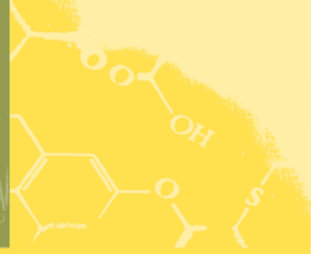




WHERE BUSINESS AND THE ENVIRONMENT CONVERGE



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September 6, 2012

ECS Project # 03-216630.00

Ms. Kimberly Tisa, PCB Coordinator – (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts, 02109-3912

Re: Response to Questions- Risk Based Site Cleanup and Disposal Plan
Thomas Prince School
170 Sterling Road
Princeton, MA 01541

Dear Ms. Tisa:

On behalf of the Town of Princeton, enclosed please find responses to the items that we discussed during our telephone conversation on September 4, 2012 regarding the above-referenced matter.

MMIP - I reviewed my files and have determined that a Monitoring and Maintenance Implementation Plan (MMIP) has not yet been submitted for this site. It had been in progress but the work was halted once the town indicated their desire to submit a modification to the original plan.

Therefore, I recommend that post-abatement sampling of the indoor air and porous surfaces (epoxy coated and non-coated) be performed soon after the abatement activities are completed and that an MMIP subsequently be submitted and implemented to address all of the abated areas.

Air Intake Vents – 100 Wing Classrooms – Prior to and following the meeting which I attended at the school yesterday, ECS and TEI closely inspected the air intake vents for the subject 100-Wing classrooms. See the attached photo, Figure 1, for a depiction of a typical vent for the subject 100-Wing Classrooms.

A typical vent opening is 54 inches wide by 8 inches in height. It is located on the bottom vertical side of the building and does not contain a louvered plate over its front but rather is open in the front, divided by several, eight inch high by two inch wide brick columns. Sheet metal ducting lines the interior of the vent and is supported in the front opening by the brick columns. The sheet metal ducting extends contiguously into the unit ventilator. Where it comes in contact with the exterior brick face of the building facade, it is crimped at a 90° angle to overlap the exterior building brick face by approximately ½ inch on all four sides. It was determined that caulking is only present at the top of the ducting of each exterior vent opening where the sheet metal duct work comes in contact with the brick, i.e. the side and

bottom joints do not contain caulk and no remnants of caulk were observed. The unit ventilator draws its room dilution air from this vent opening.

Following is the plan, in order of operation, to address these exterior vent openings as part of the previously submitted modification.

- 1) All exterior caulk associated with the vents will be removed (this will be approximately 22.5 linear feet based on caulk only being present at the top of the vent as recently confirmed);
- 2) The ½ inch of sheet metal that is crimped at a 90° angle parallel with the brick face, on all four sides, will be bent back so that it is perpendicular to the brick face. This will provide access to the small gap between the brick and the sheet metal for cleaning and epoxy coating;
- 3) The gaps between the sheet metal and brick will be suctioned with a HEPA vacuum to remove loose residual debris that may be present;
- 4) The readily accessible inner surfaces of the duct work, at and within the opening of the air vent, will be cleaned via HEPA vacuum to remove dust, dirt or debris;
- 5) The readily accessible surfaces of the sheet metal duct work and brick that were in contact with the caulking will be cleaned via wet wipe methods;
- 6) The readily accessible inner surfaces of the duct work, at and within the opening of the air vent, will be cleaned via wet wipe methods;
- 7) Two coats of epoxy will be applied to the accessible surfaces of the brick to a distance of eight inches (four brick widths) from each side of the vent, consistent with the previously approved distance for the 200-Wing rooms). In addition, two coats of epoxy will be applied to the brick surfaces that are perpendicular to the brick face wall at a distance of approximately ½ to 1 inch at the corners of the brick surface that extend below the metal duct work;
- 8) The edges of the sheet metal duct work, adjacent to the exterior brick building façade, will be bent back to their original positions such that approximately ½ inch of sheet metal will cover the edges of the epoxy coated brick at the openings of the air vents.

Air Intake Louvered Vent Covers – 200 Wing Classrooms – As we discussed on Tuesday, the approved Risk Based Site Cleanup Plan for the 200-Wing exterior metal louvered air intake vent covers provided for the removal and replacement of the covers (section 4.4, bullet one of the February 13, 2012 Risk Based Cleanup Plan). Due to an oversight, the vent covers were not removed. Following the meeting at the school yesterday, ECS and TEI closely inspected several of the exterior louvered air intake vent covers for the 200-Wing classrooms. Review of field notes and a discussion with the TEI Field Supervisor were also performed to confirm the actions that were taken to address the metal louvered vent covers. Based on a review of available information and discussions with TEI, it was confirmed that the following actions were taken in response to the exterior louvered vent covers:

- a) All visual exterior caulking was removed;
- b) The outer sides of the louvered vent covers (sides facing away from the building) had been cleaned via HEPA vacuum and wet wipe methods (the inner sides of the vent covers (facing the building) had not been cleaned);

- c) Two layers of epoxy were applied to the brick face within 8 inches of each side of the louvered vent covers.

As a modification to the plan, ECS proposes to collect three wipe samples, per required EPA methodology, and submit the samples for analysis via EPA Methods 3540C and 8082 for PCB's. It is proposed that one sample each be collected from three of the six existing inner sides of the louvered vent covers. If the result of a wipe sample for a particular louvered vent cover is greater than 1 ug/100cm² PCB, that louvered vent cover will be removed and cleaned via HEPA vacuum and wet wipe methods or replaced with a new cover.

If the cleaning option is selected, upon cleaning, another wipe sample will be collected from the inner side of the vent. If the sample result remains greater than 1 ug/100cm² PCB, the louvered vent cover will again be cleaned via HEPA vacuum and wet wipe methods or replaced with a new cover. Any cover that produces results less than 1 ug/100cm² PCB will remain in place or be reinstalled (if it was removed for cleaning and re-sampling). This procedure will continue until either a result of less than 1 ug/100cm² PCB is obtained for a particular vent cover or until a new cover is obtained. The decision to resample or replace a cover will be made by the Town of Princeton. See the attached photo, Figure 2, for a depiction of a typical exterior louvered vent cover for the 200-Wing Classrooms.

Thank you for your prompt attention to this matter. If any require any additional explanations and/or clarifications, please notify me immediately to discuss.

Sincerely,

ENVIRONMENTAL COMPLIANCE SERVICES, INC.



Charles Klingler
Worcester Branch Manager

cc: Town of Princeton, John Lebeaux, Town Administrator
Wachusett Regional School District, Thomas Pandiscio, Superintendent

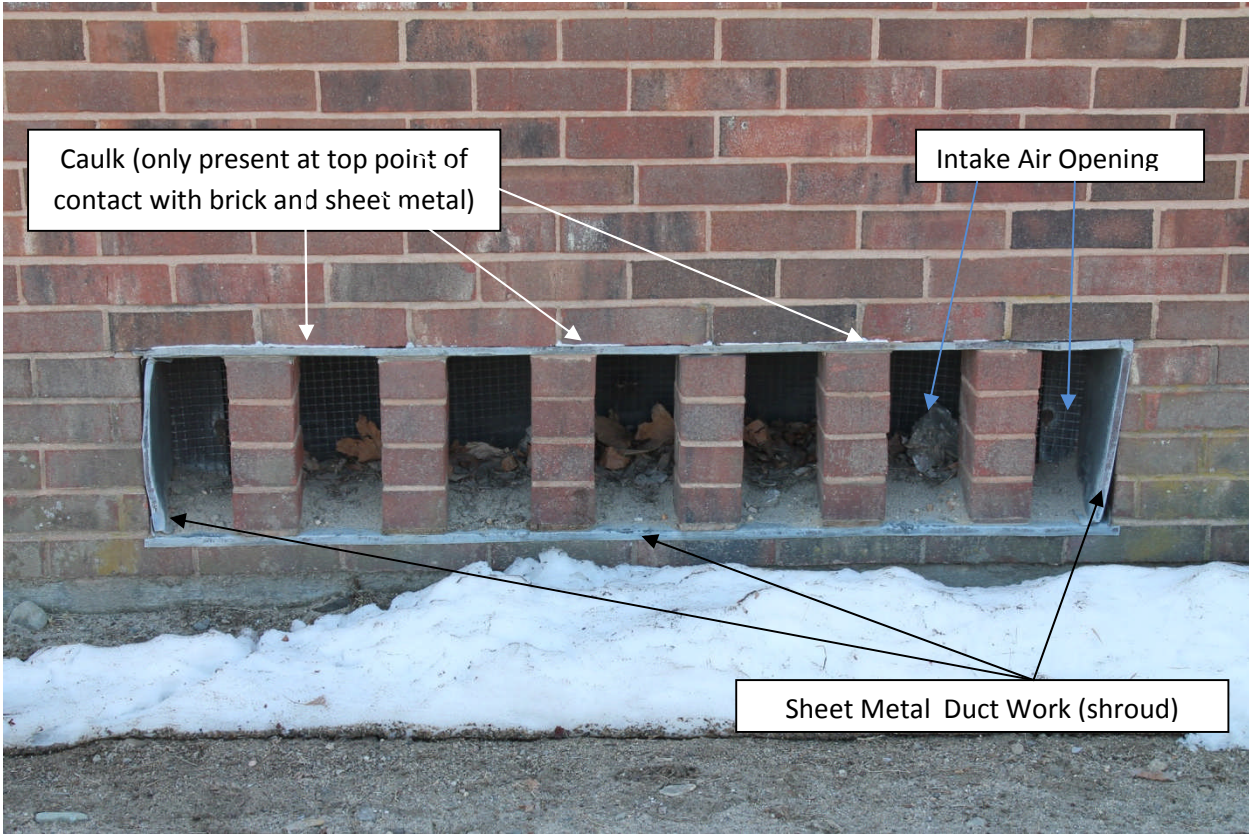


Figure 1: Typical Exterior Vent Structure: 100 Wing Classrooms.

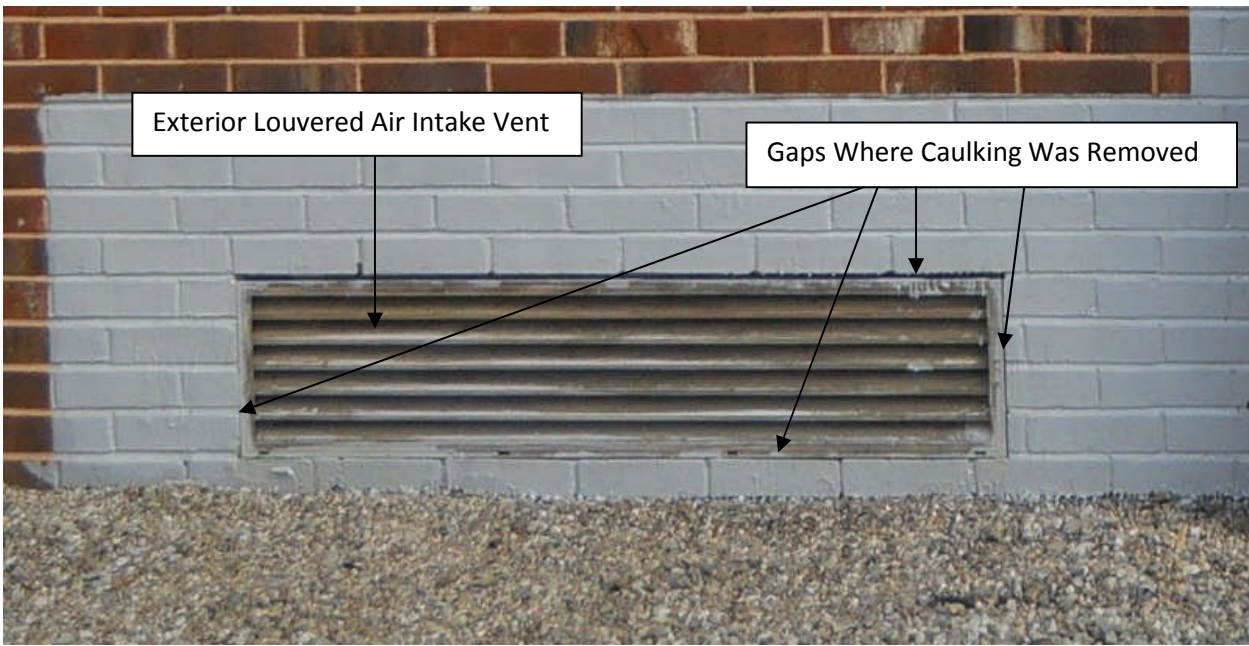


Figure 2: Typical Exterior Louvered Vent Structure: 200 Wing Classrooms.