

**COMMITMENT & INTEGRITY**  
**DRIVE RESULTS**

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October 15, 2010

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

Re: Dubois Library Elevator Replacement Project Status Update  
Dubois Library PCB Cleanup and Disposal Approval  
under 40 CFR 761.61(c), 761.62, and 761.79(h)  
University of Massachusetts – Amherst Campus

Dear Ms. Tisa:

On behalf of the University of Massachusetts (UMass), this letter has been prepared to provide a status update on the remediation activities completed to date in accordance with the Dubois Library PCB Cleanup and Disposal Approval under 40 CFR 761.61(c), 761.62, and 761.79(h) (the Approval) received by UMass on April 8, 2010.

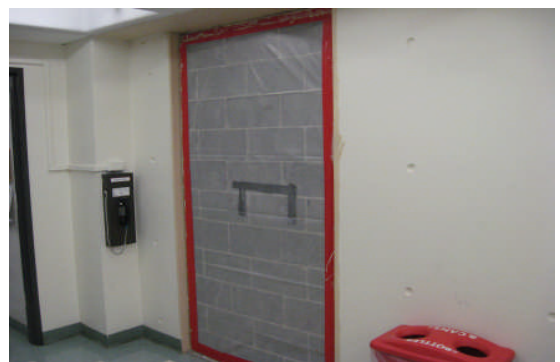
Per Recordkeeping and Reporting Condition 21 of the Approval, a final completion report is required to be submitted by UMass within 120 days of project completion; however, the PCB remediation is being conducted as part of the elevator replacement project which is currently anticipated to be completed in September 2012. Based on this, and the fact that the substantive portions of the PCB remediation activities (i.e., material removal and application of the Sikagard 550W coating) have been completed, this project status update has been prepared to summarize these aspects of the project at this time.

**Material Removal (Caulking and Plaster Materials)**

Removal of PCB containing caulking and plaster materials was conducted in accordance with Section 3.2 of the March 2010 Risk-Based Disposal and Cleanup PCB Remediation Plan (the Plan) and the PCB Remediation Work Plan submitted on May 14, 2010 with follow up comment response on May 19, 2010. During project implementation, additional plaster materials were also removed from some in-fills on the unused elevator shaft to evaluate the potential of eliminating encapsulation and long term maintenance of these materials.

Following plaster removal, the masonry block was inspected to verify that all plaster was removed and verification samples of the underlying masonry block were collected. One sample was collected from a randomly selected location on each in-fill and submitted for PCB analysis. Following sample collection, polyethylene sheeting was temporarily installed over the block (see photograph to the right).

Analytical results from the verification samples indicated that the concentration of PCBs ranged from 0.196 to 29.4 ppm with approximately two-thirds (25 of 37 in-fills) detecting PCBs > 1 mg/kg. A summary of the verification sampling results is presented on Table 1.



**Masonry Block Materials**



As per Section 3.2.3 of the Plan, masonry block from in-fills represented by verification samples containing PCBs at concentrations > 1 ppm will be removed and managed as PCB remediation waste (visual inspection indicated that all plaster was removed and thus additional removal was not possible). Removal of these materials will be scheduled as part of the overall elevator replacement project. As an interim protective measure and for aesthetic purposes, dry wall has been installed over all exposed masonry block materials (see photograph to the right).



#### Application of Sikagard 550W Coating

As per Section 3.2.4 of the remediation plan, following removal of the caulking materials, visual inspections were conducted to confirm source removal prior to the application of the encapsulant. Two coats of the elastomeric acrylic coating (Sikagard 550W) were then applied in contrasting colors to the building joint and adjacent building materials (structural concrete surfaces, ceiling concrete surfaces, transom plaster, and in-fill plaster remaining in place) as indicated in the Plan. The final protective coating for all surfaces within the elevator lobbies, a coat of acrylic latex paint, will be applied at the completion of the elevator replacement project.

#### Installed Dry Wall Materials

In order to evaluate the effectiveness of the initial protective coating, wipe samples were collected from surfaces coated with the Sikagard 550W product. A total of four wipe samples were collected from each of the main categories of building surfaces. One sample was collected from each of the following surfaces: plaster in-fill remaining in place; structural concrete column, transom plaster, and concrete ceiling. Analytical results indicated that the concentration of PCBs were below the laboratory's minimum reporting limit in all samples collected (<0.5 µg/100cm<sup>2</sup>). A summary of the wipe sample locations and analytical results is presented on Table 2.

#### Project Schedule

As noted above, the overall elevator replacement project is currently scheduled to be completed in September 2012. Elevator replacement is to be conducted on one elevator shaft at a time beginning with Shaft 5 this fall. In-fill materials will be removed as part of the individual elevator replacement activities (i.e., one shaft at a time). Given that there are no in-fills for removal on Shaft 5, removal of masonry block materials is not scheduled to occur until late winter/early spring of 2011. As per the Approval, masonry block materials will be removed and managed for disposal based on the PCB concentrations reported in the verification testing.

The application of the final protective coating (the application of a final layer of paint) to lobby surfaces will be conducted at the completion of all elevator replacement activities. In accordance with Approval Condition 12, initial indoor air sampling and surface sampling shall be conducted at that time. In addition, a maintenance and monitoring plan will be developed and submitted in accordance with Condition 14 of the Approval.

If you have any comments, questions, or require further information, please do not hesitate to e-mail or call me at the number listed above.

Sincerely,

WOODARD & CURRAN INC.

Jeffrey Hamel, LSP, LEP  
Senior Vice President

Attachments: Tables 1 and 2

cc: Henry Merriman, UMass  
Terri Bechta, UMass

**Table 1  
Summary of Masonry Block Verification Sampling Results**

**UMass Dubois Library  
Amherst, MA**

<b>Date</b>	<b>Sample ID</b>	<b>Floor</b>	<b>Shaft</b>	<b>Total PCBs (mg/kg)</b>
5/20/10	DL-24E4-VMS-001	24	4	0.281
5/21/10	DL-22E4-VMS-002	22	4	0.196
5/26/10	DL-21E4-VMS003	21	4	1.63
5/27/10	DL-19E4-VMS-004	19	4	29.4
5/28/10	DL-18E4-VMS-005	18	4	4.04
6/2/10	DL-15E1-VMS-006	15	1	0.627
6/2/10	DL-15E2-VMS-007	15	2	3.77
6/3/10	DL-13E1-VMS-008	13	1	1.39
6/3/10	DL-13E2-VMS-009	13	2	0.348
6/8/10	DL-12E0-VMS-013	12	0	0.258
6/4/10	DL-12E1-VMS-011	12	1	3.27
6/4/10	DL-12E2-VMS-010	12	2	1.32
6/4/10	DL-11E0-VMS-012	11	0	0.234
6/8/10	DL-10E0-VMS-014	10	0	3.98
6/8/10	DL-10E1-VMS-015	10	1	1.266
6/8/10	DL-10E2-VMS-016	10	2	0.933
6/9/10	DL-9E0-VMS-023	9	0	0.217
6/9/10	DL-9E1-VMS-024	9	1	6.03
6/9/10	DL-9E2-VMS-025	9	2	0.815
6/10/10	DL-7E0-VMS-027	7	0	7.94
6/10/10	DL-7E1-VMS-026	7	1	9.88
6/10/10	DL-7E2-VMS-028	7	2	3.34
6/8/10	DL-6E0-VMS-017	6	0	14.04
6/8/10	DL-6E1-VMS-018	6	1	15.86
6/8/10	DL-6E2-VMS-019	6	2	13.71
6/9/10	DL-5E0-VMS-020	5	0	1.34
6/9/10	DL-5E1-VMS-021	5	1	2.41
6/9/10	DL-5E2-VMS-022	5	2	3.14
6/9/10	DL-4E0-VMS-035	4	0	0.605
6/9/10	DL-4E1-VMS-036	4	1	7.49
6/9/10	DL-4E2-VMS-037	4	2	1.77
6/10/10	DL-3E0-VMS-030	3	0	7.49
6/10/10	DL-3E1-VMS-029	3	1	7.66
6/10/10	DL-3E2-VMS-031	3	2	7.57
6/10/10	DL-2E0-VMS-032	2	0	0.247
6/10/10	DL-2E1-VMS-033	2	1	0.31
6/10/10	DL-2E2-VMS-034	2	2	3.45

Notes:

All samples extracted by Soxhlet Method 3540C and analyzed for PCBs by USEPA Method 8082.  
Analytical results shaded indicate total PCBs > 1 ppm.

**Table 2  
Initial Wipe Sample Locations**

**UMass Dubois Library  
Amherst, MA**

<b>Surface Material</b>	<b>Lobby and Elevator Shaft</b>	<b>Distance from Caulked Joint (inches)</b>	<b>Corresponding Bulk Sample IDs</b>	<b>Verification Wipe Sample ID</b>	<b>Sample Date</b>	<b>Reporting Limit (µg/100cm<sup>2</sup>)</b>	<b>Total PCBs (µg/100cm<sup>2</sup>)</b>
In-Fill	24E6	1	090409-15 (33.5 mg/kg)	DL-VWP-001	8/17/2010	0.5	<0.5
Structural Concrete	6E1	1	090409-13 (38.8 mg/kg)	DL-VWP-003	8/17/2010	0.5	<0.5
Transom Plaster	3E4	6	DL-3E4-CTP(6-7)-079 (1.67 mg/kg)	DL-VWP-004	8/17/2010	0.5	<0.5
Ceiling	15E2	6	DL-15E2-CCC(6-7)-036 (2.96 mg/kg)	DL-VWP-002	8/17/2010	0.5	<0.5

Notes:

All samples extracted by Soxhlet Method 3540C and analyzed for PCBs by USEPA Method 8082.