

Date: Mon, 31 Mar 2008 16:01:10 -0400
To: pmintz@icsd.k12.ny.us
From: Walter Hang <walter@toxicstargeting.com>
Subject: release report/answer questions

Greetings:

I submitted a Freedom of Information Law Request on 3/27/08 for the Ithaca City School District's Indoor Air Testing Results for South Hill Elementary School. When might I receive the report containing the findings? Why are you withholding its release? With respect, I believe those testing results should be immediately released for public review.

Given that you have not released the report, I write to ask several questions regarding the withheld data.

A. It is my understanding that the report noted one room with what appeared to be "...accumulating low-level CVOC concentrations, likely due to product storage in the room."

What evidence did your consultant provide to support the conclusion that the chlorinated volatile organic chemical concentrations were "likely due to product storage in the room?"

B. It is standard procedure to identify and remove potential contaminant sources, such as cleaning solutions, solvents, and other consumer products containing toxic compounds, prior to conducting indoor air quality testing. Did your consultant follow this procedure? A container of a product containing a toxic solvent would presumably be hard to miss.

What contaminant(s) was/were detected, at what concentration(s) and where in the school?

C. You reported "Items that have been dry-cleaned are the most common source producing this result. Although this low-level was well below the state standard, the District in consultation with the testing firm has arranged for the room to be re-inventoried and retested within two weeks to confirm the results and if still present, investigate what products or materials might be contributing to a positive finding."

The contaminant most commonly associated with dry-cleaning is tetrachloroethylene (aka perchloroethylene (PERC)). PERC is a potential cancer-causing agent according to the National Institute of Occupational Safety and Health. It seems unlikely that PERC could linger in the ambient air of a room over Christmas vacation.

Please note there is no New York State Indoor Air Standard for PERC. There is a New York State Department of Health (DOH) guideline of 100 micrograms per cubic meter. In addition, the DOH's guideline Fact Sheet notes: "Reasonable and practical actions should be taken to reduce PERC exposure when indoor air levels are above background, even when they are below the guideline of 100 micrograms/cubic meter." The DOH also notes: "The goal of the recommended actions is to reduce PERC levels in indoor air to as close to background as practical."

According to the most recent nationwide study of ambient outdoor air conducted by the U.S. Environmental Protection Agency, the median analytical results were "no detect." See NYS DOH PERC guideline Fact Sheet. That finding would support reducing PERC concentrations to "no detect" in the school.

D. You reported that your testing included "outdoor air samples."

What concentrations of contaminants, if any, were detected in outdoor ambient air?

E. The New York State Department of Environmental Conservation's (DEC) testing of the soil gas vapor under the South Hill Elementary school foundation identified PERC in a variety of locations, including under Rooms 102, 104, 109, 113 and 122.

How did your consultant conclude that the contaminant identified in the school did not result from Soil Gas Vapor Intrusion?

I look forward to receiving your response.

Very truly yours,

Walter Hang