



STATE OF NEW YORK DEPARTMENT OF HEALTH

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Richard F. Daines, M.D.
Commissioner

James W. Clyne, Jr.
Executive Deputy Commissioner

December 24, 2009

Michael G. Malloy
Department of Environmental Health and Safety
SUNY New Paltz
Service Building Room 110A
75 South Manheim Boulevard
New Paltz, NY 12561

Re: PCB Testing Report

Dear Mr. Malloy:

As requested, we reviewed the PCB Wipe and Air Sampling Report prepared by Professional Services Industry Inc. (PSI) and dated November 13, 2009. The testing demonstrates that air and surface levels of PCBs remain below the established cleanup criteria.

Comments on the report are provided below. These comments do not affect the overall conclusions of the report.

Page 2, Background/Previous Investigations:

The 3rd paragraph indicates that the Binghamton State Office Building (BSOB) cleanup criteria were developed specifically to determine the effectiveness of encapsulants after the 1981 electrical fire. The BSOB criteria were developed for building re-entry considering both background levels and health risk estimates, not for determining the effectiveness of encapsulants.

Page 2, Sampling Methods, Field Activities and Results:

Several differences in sampling methods and results were not in general accordance with previous sampling protocols. For instance, Clean Harbors used 100 square centimeter (cm²) wipe sampling templates (as described in the Toxic Substance Control Act, Title 40, Subpart G, 761.123) in 2009 vs. the 900 cm² template used by New York State Department of Health in 2005. In addition, Adirondack Environmental Services Inc. used a higher minimum reporting limit of 0.5 micrograms (mcg)/100 cm² for wipe samples in 2009 vs. the 0.01 mcg/100 cm² reporting limit used by Wadsworth Center Laboratory in 2005.

Page 3, Wipe Sample Result Tables:

Since the reporting limit of 1 mcg/100 cm² for the wipe samples was at the established cleanup criterion of 1 mcg/100 cm², I reviewed the Analytical Quality Control Summary Report and consulted with NYSDOH Environmental Laboratory Approval Program (ELAP) technical staff to evaluate the reported data. I subsequently contacted Adirondack Environmental Services Inc. (the analytical laboratory for the project) and they re-issued the wipe sample data reports with a lowered practical quantitation limit (PQL) of 0.5 ug/100cm². For the revised wipe sample data, twenty wipe sample results were below 0.5 mcg/100cm². Two samples from Gage Hall were reported at 0.76 mcg/100cm² and 0.97 mcg/100cm² and one sample from Parker Theater was reported at 0.5 mcg/100cm². These results remain below the cleanup criterion of 1.0 mcg/100cm².

Page 5, Air Samples, the first sentence and table of results:

The PSI report indicates that the laboratory method detection limit (MDL) is 0.03 micrograms per cubic meter (mcg/m³) for the air sample results. This is incorrect. The laboratory report shows <0.00025 milligrams per cubic meter (equivalent to <0.25 mcg/m³) for the air sample concentrations. This is the MDL that should be identified in the PSI report. The air sample results remain below the cleanup criterion of 1 mcg/m³.

Page 5, Interpretation of Results, Air samples:

The statement should indicate the correct laboratory limit of quantitation (LOQ) of 0.25 mcg/m³.

I suggest these comments and the revised laboratory reports be included as an addendum to the PSI report. If you have any questions, please contact me at (518) 402-7810.

Sincerely,

Gerald McDonald
Bureau of Toxic Substance Assessment

cc: E. Horn, Ph.D.
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