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Subject: Re: Amendment #4 to Ambient Air Monitoring Plan

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of today's submittal by TRC Environmental Corporation on behalf of the Lower Manhattan Construction Command Center and the Lower Manhattan Development Corporation. This submittal, attached below, amends the downward movement of scaffold monitors in Section 2, Ambient Air Monitoring Program Plan, of the September 7, 2005 130 Liberty Street Deconstruction Plan.

Based on our review of the aforementioned document, EPA accepts this March 8, 2007 Amendment #4 to the 130 Liberty Street Deconstruction Plan.

EPA and the other regulatory agencies will continue to monitor the abatement and deconstruction work as it progresses, and look forward to our ongoing consultation with you throughout the execution of the project. Thank you.

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cc  
03/08/2007 11:33  
AM Subject

Here is re-titled Amendment #4 with "Issue 1 " removed Ed

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(See attached file: Final AMP Amendment Form #4 030807.pdf)

**SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM:  
ISSUE #4**

**DATE FORM SUBMITTED: 03/08/07**

**Title**                      **Section 2 – Ambient Air Monitoring Program Plan  
130 Liberty Street Abatement & Deconstruction Project  
September 7, 2005**

**AMENDMENT #4**

This Amendment will define the downward movement of scaffold monitors. This Amendment will comply with the existing provisions of both the September 7, 2005 Ambient Air Monitoring Program Plan as well as current Amendments to this Plan and the Implementation Plan dated September 19, 2006 (including any amendments that may be approved by the regulators). The current project status is the interior abatement is complete from the roof to and including the 35<sup>th</sup> floor, the exterior column cover and fascia removal is nearing completion down to the 35<sup>th</sup> floor and structural demolition is anticipated to commence shortly. Scaffold monitors, except silica monitors, that are currently located on the 30<sup>th</sup> floor shall be moved to the 20<sup>th</sup> floor scaffold platform. Silica monitors shall remain on the 30<sup>th</sup> floor and shall move downward with structural deconstruction. Subsequent movement of scaffold monitors will adhere to the following requirements. Monitors (except silica – see below) will not be placed greater than ten (10) floors below nor greater than four (4) floors above the active abatement (including the cleaning and removal of exterior column covers and fascia). In addition, these scaffold monitors shall not be placed greater than twenty (20) floors below active deconstruction of abated and cleaned floors which have successfully passed visual inspection and aggressive air clearance sampling. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.

**Reason for Amendment:**

The monitoring plan currently specifies (Section 2.1 Network Design) that floating monitoring stations shall be relocated as the deconstruction progresses to other scaffolding locations situated along the exterior of the building at pre-selected elevations. These elevations are currently configured in ten (10) floor increments as follows: 10<sup>th</sup> floor, 20<sup>th</sup> floor, 30<sup>th</sup> floor and 40<sup>th</sup> floor. Amendment #1 Issue 2 dated 09/06/06 of the Ambient Air Monitoring Program Plan also specifies that abatement work areas shall not proceed beyond a distance of four (4) floors below the level at which the monitoring stations are currently located. The abatement and deconstruction activities at 130 Liberty Street are a very dynamic process especially when performed simultaneously. As a result monitoring at fixed elevations in ten floor increments will prove too restrictive and may adversely affect completion of the project in a timely and cost-effective manner moving forward. The proposed plan for downward movement of scaffolds will maximize monitoring efficiency, facilitate project implementation and will be cost-effective. The proposed plan will maintain the adequacy of the monitoring program and the quality of data obtained. Additionally, the note to Table 3 of the Ambient Air Monitoring Program Plan Section 6.0 states downward moving of elevated Scaffold Stations will be based on highest reasonable floor in relationship to the work as will be determined in consultation with the EPA.

## SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM

### Sections of Air Monitoring Plan Affected:

Section 2.1, Network Design, On-site Scaffolding Elevated Stations: The reference to the relocation of the scaffolding locations in ten floor increments will be removed. This will be replaced with the following text: “Subsequent to the next movement to the 20<sup>th</sup> floor, the four ‘floating’ monitoring stations (with the exception of the silica monitors) will all be relocated on the scaffolding to any single floor, all at the same elevation, on an as needed basis but will not be placed greater than ten (10) floors below nor greater than four (4) floors above the active abatement (including the cleaning and removal of exterior column covers and fascia). In addition, these scaffold monitors shall not be placed greater than twenty (20) floors below active deconstruction of abated and cleaned floors which have successfully passed visual inspection and aggressive air clearance sampling.

Downward movement of scaffold silica monitors shall not be placed greater than ten (10) floors below active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

Section 2.3, Locations of Monitoring Stations: The reference to the relocation of the scaffolding locations in ten floor increments will be removed. This will be replaced with the following text: “Subsequent to the next movement to the 20<sup>th</sup> floor, the four ‘floating’ monitoring stations (with the exception of the silica monitors) will all be relocated on the scaffolding to any single floor, all at the same elevation, on an as needed basis but will not be placed greater than ten (10) floors below nor greater than four (4) floors above the active abatement (including the cleaning and removal of exterior column covers and fascia). In addition, these scaffold monitors shall not be placed greater than twenty (20) floors below active deconstruction of abated and cleaned floors which have successfully passed visual inspection and aggressive air clearance sampling.

Downward movement of scaffold silica monitors shall not be placed greater than ten (10) floors below active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

**Date Implemented:** March 2007