

QAPP AMENDMENT FORM: Issue 3
DATE FORM EFFECTIVE: 6/29/06

Title **Quality Assurance Project Plan for the Ambient Air Monitoring Program**
 130 Liberty Street Abatement & Deconstruction Project
 September 7, 2005

AMENDMENT #1

The stop work procedures currently in place for PM2.5 exceedances will be extended to crystalline silica as well. However, if an assessment determines that an off-site roof top air monitoring location exceedance of a USEPA Site Specific Trigger Level for PM2.5 or silica is associated with 130 Liberty Street, the exceedance will result in a stoppage of work until an evaluation of emission controls is performed and corrective action acceptable to USEPA is in place.

Reason for Amendment:

Crystalline silica, like PM2.5, is a common constitute of urban ambient air. The background concentration of crystalline silica in urban areas* ($1-10 \text{ ug/m}^3$) is within the same order of magnitude of the EPA Site-Specific Trigger Level (10 ug/m^3) for the 130 Liberty Street deconstruction project. Trigger Level exceedances for PM2.5 and crystalline silica have the potential to result from background variability and such exceedances have been detected by monitors in the vicinity of 130 Liberty. This situation is similar to the situation for PM2.5. Accordingly, the stop work procedures currently in place for PM2.5 exceedances are extended to crystalline silica as well.

* Hardy T, Weill H. 1995. Crystalline Silica: Risks and Policy. Env Health Perspect, Vol. 103 (2)

Section of QAPP Affected:

Section 6.3.3.2, Actions Based on Exceedances: Silica will be added to the following portion of the first paragraph of this section: “Exceedance of USEPA Site Specific Trigger Levels will result in a stoppage of work until an evaluation of emission controls is performed and corrective action is in place. The USEPA Site Specific Trigger Levels are applicable to individual sample results. If any of the individual sample results exceed an USEPA Site Specific Trigger Level, then notification must be made to the USEPA Region 2, NYCDEP and NYSDOL as well as LMDC and LMCCC. Work will be reinitiated once the USEPA Region 2 has agreed (and NYSDOL during the Abatement Phase in the case of asbestos exceedances) to the corrective action(s) proposed to prevent the potential for exceedances in future work and such corrective actions have been implemented. The only exception to the work stoppage requirement will be for an exceedance of the USEPA Site Specific Trigger Level for PM2.5 or silica at one of the off-site roof top locations. If the USEPA Site Specific Trigger Level for PM2.5 or silica is exceeded at an off-site roof top location, regulator notifications as described above shall be made and an assessment, with the active involvement of the USEPA, will be performed to determine if the exceedance was due to an off-site or regional condition unrelated to 130 Liberty Street work. If the assessment determines the exceedance to be associated with 130 Liberty Street, the exceedance will result in a stoppage of work until an evaluation of emission controls is performed and corrective action acceptable to USEPA is in place.”

Date Implemented:

June 29, 2006

AMENDMENT #2

Provide clarity on activities that will not be stopped due to an exceedance of an USEPA Site Specific Trigger Level.

Reason for Amendment:

Some activities such as the maintenance of engineering controls are essential during a work stoppage to prevent the occurrence of a situation that may present an imminent and substantial endangerment to public and worker health and the environment.

Section of QAPP Affected:

Section 6.3.3.2, Actions Based on Exceedances: The following language will be added as the second paragraph for this section: “When work stoppage is required, the following essential and ancillary activities would not be subject to work stoppage: air monitoring, hoist operation, negative air unit operation and maintenance, maintenance of critical barriers, deliveries from off-site, and security.”

Date Implemented:

June 29, 2006

AMENDMENT #3

The QAPP needs to correctly reference the final Air Monitoring Plan.

Reason for Amendment:

The QAPP incorrectly references an earlier draft August 2005 version of the Air Monitoring Plan as opposed to the final September 7, 2005 version.

Sections of QAPP Affected:

Section 6.1, Ambient Air Monitoring Program for the 130 Liberty Street Deconstruction Project;

Section 7.1, Project Overview; Section 7.1.1, Sampling Tasks; and Section 8.1, Project Quality

Objectives: “August 2005” will be stricken in reference to the date of the *Ambient Air*

Monitoring Program for the 130 Liberty Street Deconstruction Project document and replaced with “September 7, 2005”.

Section 6.3.2.2, Actions Based on Exceedances: Reference to the “August 2005 Air Monitoring Plan” will be removed from the first paragraph of this section and replaced with “September 7, 2005 Section 2 – Ambient Air Monitoring Program”. The first paragraph will now read as follows: “Exceedance at any of the twelve (12) monitoring locations will be handled as set forth in the September 7, 2005 Section 2 – Ambient Air Monitoring Program Plan.”

Section 7.1, Project Overview: Reference to the “Ambient Air Monitoring Program (August 2005)” in the third bullet item will be replaced with “Ambient Air Monitoring Program (September 7, 2005)”.

Date Implemented:

June 29, 2006

AMENDMENT #4

The QAPP needs to correctly reference the final Asbestos and COPC Abatement and Removal Plan.

Reason for Amendment:

The QAPP incorrectly references an earlier draft August 2005 version of the Asbestos and COPC Abatement and Removal Plan as opposed to the final September 7, 2005 version.

Section of QAPP Affected:

Section 7.1, Project Overview: “(August 2005)” will be stricken in reference to the date of the Asbestos and COPC Abatement and Removal Plan and replaced with “(September 7, 2005)” in the second and third bullet items.

Date Implemented:

June 29, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

June 29, 2006

Victor J. Gallo
Senior Advisor & Counsel, Environmental & Regulatory Affairs
Lower Manhattan Development Corporation
One Liberty Plaza, 20th Floor
New York, New York 10006

Re: Proposed Protocol for Exceedance Reporting and Corrective Actions

Dear Mr. Gallo:

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the April 25, 2006 submission from LMDC titled, *Proposed Protocol for Exceedance Reporting and Corrective Actions* (Proposed Protocol).

Based on our review of the Proposed Protocol, only the following conditions shall be amended in the September 7, 2005 plans for the abatement and deconstruction of the 130 Liberty Street building:

- (1) Conform work stoppage requirements for silica to those now in place for PM2.5 for the four off-site roof-top air monitoring stations; and
- (2) When work stoppage is required, the following essential and ancillary activities would not be subject to work stoppage: air monitoring, hoist operation, negative air unit operation and maintenance, maintenance of critical barriers, deliveries from off-site except for loose bulk material that may potentially generate dust and cause an exceedance, and security.

EPA has enclosed amendment forms to designate the portions of the September 7, 2005 plans for the abatement and deconstruction of the 130 Liberty Street building that shall be amended to include the specific language provided.

LMDC's attempt to develop "Emission Incident Reports" and "Exceedance Assessment Checklists" would be beneficial information to assist in understanding a potential emission source that may exceed a Target Air Quality Level or USEPA Site Specific Trigger Level and would assist LMDC to develop an exceedance summary report in cases where a USEPA Site Specific Trigger Level is exceeded. While submission of these "Emission Incident Reports" and "Exceedance Assessment Checklists" would not avoid work stoppage, EPA is receptive to receiving such information in the event LMDC anticipates a potential exceedance.

Sincerely,



Pat Evangelista
WTC Coordinator
New York City Response and Recovery Operations
USEPA-Region 2

Enclosures

cc: Sal Carlomagno, NYSDEC w/encls.
Chris Alonge, NYSDOL w/encls.
Krish Radhakrishnan, NYCDEP w/encls.
Richard Mendelson, OSHA w/encls.
Robert Iulo, NYCDOB w/encls.