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Sent: Friday, January 08, 2010 4:00 PM
To: Hunt, Gary (Lowell,MA-US)
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Konca.Mitchel@dol.gov; Denly, Elizabeth (Lowell,MA-US); Gerds, Edward
(NYC,NY-US); Rocha, Bruno (NYC,NY-US); Lihzis, Melita (Lowell,MA-US)
Subject: EPA accepts revised January 7, 2010 Amendment #10 to Section 2 - Ambient
Air Monitoring Program Plan and QAPP for 130 Liberty Street
Attachments: QAPP_Amendment#10_010710.pdf; AMP_Amendment#10_010710.pdf;
Fig1_AMP Amendment#10_rev010710.pdf; Fig4_AMP
Amendment#10_rev010710.pdf; Fig7-1_QAPP
Amendment#10_rev010710.pdf; Fig7-4_QAPP
Amendment#10_rev010710.pdf

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the attached revised January 7, 2010 Amendment #10 to Section 2 - Ambient Air Monitoring Program for the 130 Liberty Street Deconstruction Project and the attached revised January 7, 2010 Amendment #10 to the September 7, 2005 Quality Assurance Project Plan (QAPP) for the Ambient Air Monitoring Program for the 130 Liberty Street Abatement and Deconstruction Project submitted by TRC Environmental Corporation (TRC) on behalf of the Lower Manhattan Development Corporation for 130 Liberty Street in lower Manhattan. The relocation of air monitoring equipment for one of the on-site sampling locations was originally accepted by EPA on November 27, 2009 based on the November 25, 2009 Amendment #10 to the Ambient Air Monitoring Program (Air Plan) for the 130 Liberty Street Deconstruction Project.

In addition, EPA accepted on December 3, 2009 the original version of the December 2, 2009 Amendment #10 to the QAPP which also addressed the revisions made to the QAPP based on the proposed relocation of the air monitoring equipment. The date originally proposed for the transition from air monitoring station 10/100 to air monitoring station 20/200 was December 6, 2009 in Amendment #10 to the Air Plan and Amendment #10 to the QAPP. However,

the date of transition was delayed and did not actually occur until January 4, 2010. Consequently, Amendment #10 to the Air Plan and Amendment #10 to the QAPP have been revised to state the actual date that the transition occurred (i.e., January 4, 2010).

Based on our review, and in consultation with the New York State Department of Labor (NYSDOL) and the New York City Department of Environmental Protection (NYCDEP), EPA accepts the January 7, 2010 revised Amendment #10 to the Air Plan and the January 7, 2010 revised Amendment #10 to the QAPP. EPA's review focused solely on measures to control potential releases of contaminants and proper procedures for air monitoring.

EPA's acceptance is not intended as a review and/or acceptance of any structural engineering and safety matters or requirements for the protection of worker safety and health or for fire protection and safety at 130 Liberty Street. EPA is relying on the New York City Department of Building's, the U.S. Department of Labor Occupational Safety and Health Administration's and the New York City Fire Department's expertise in these areas, respectively.

Thank you.

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Subject

RE: Follow-up Question on
Accepted Amendment #10 to Section
2 - Ambient Air Monitoring
Program Plan and QAPP for 130
Liberty Street

Emmet:

We have revised all Figures to reflect issue date of January 7 2010. The four (4) affected files are attached herein. These include two (2) figures associated with the QAPP and two (2) figures with the AMP, respectively. Once we receive approval of the attached files we will proceed with posting of the Amendments and Figures as per the existing process.

Regards

Gary Hunt/TRC

-----Original Message-----

From: Keveney.Emmet@epamail.epa.gov
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Sent: Friday, January 08, 2010 10:29 AM
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(Lowell,MA-US)
Subject: RE: Follow-up Question on Accepted Amendment #10 to Section 2 -
Ambient Air Monitoring Program Plan and QAPP for 130 Liberty Street

Gary - only one minor comment with regard to the revised Ambient Air Monitoring Program Plan Amendment #10:

1. The dates (updated amendment date and date of figure) referenced in Figures 1 and 4 should be revised to January 2010 to reflect the revised submission of Ambient Air Monitoring Program Plan Amendment #10 to correct the date that air monitoring station 20/200 went into operation and air monitoring station 10/100 went out of service.

Thank you.

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Emmet Keveney/R2/USEPA/US@EPA
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Subject

RE: Follow-up Question on
Accepted Amendment #10 to Section
2 - Ambient Air Monitoring
Program Plan and QAPP for 130
Liberty Street

Emmet:

AMP and QAPP Amendments #10 and associated Figures have been revised to reflect Station 20/200 start date of Monday January 4 2010. All of the files associated with the Amendments are attached herein. Should you have questions or should you need additional information please let me know.

Regards

Gary Hunt/TRC

-----Original Message-----

From: Hunt, Gary (Lowell,MA-US)

Sent: Wednesday, January 06, 2010 1:43 PM

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Subject: RE: Follow-up Question on Accepted Amendment #10 to Section 2 -

Ambient Air Monitoring Program Plan and QAPP for 130 Liberty Street

Emmet:

Station 20/200 commenced operation on Monday January 4 2010. The Amendments to the Air Monitoring Plan and the QAPP will be revised to reflect this date and issued tomorrow.

Regards

Gary Hunt/TRC

-----Original Message-----

From: Keveney.Emmet@epamail.epa.gov
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Subject: Follow-up Question on Accepted Amendment #10 to Section 2 - Ambient
Air Monitoring Program Plan and QAPP for 130 Liberty Street

Gary, please clarify the status on the transition from air monitoring station 10/100 to air monitoring station 20/200. Amendment 10 to the Air Plan and the QAPP states that the start-up date for the new air monitoring station 20/200 was to occur on December 6, 2009 with air station 10/100 going out of service as of December 6, 2009. However, looking through the latest weekly ambient air monitoring report, week 223 with air data for PM10 up to December 19, 2009, it appears that air monitoring station 10/100 is still in operation as opposed to air monitoring station 20/200. Please keep us posted on the transition from air station 10/100 to 20/200; and, please submit an amendment to the Air Plan and its QAPP once the transition has occurred to correct the dates now currently specified in Amendment 10 to the Air Plan and QAPP for the dates of operation for air monitoring station 10/100, relocation date of the meteorological ground monitoring station, and the start-up date of air monitoring station 20/200. Thank you.

----- Forwarded by Emmet Keveney/R2/USEPA/US on 12/24/2009 07:49 AM

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Keveney/R2/USEPA
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11/27/2009 02:41

cc

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Subject

Acceptance Amendment #10 to
Section 2 - Ambient Air
Monitoring Program Plan for 130
Liberty Street (Revised)(Document
link: Emmet Keveney)

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the attached November 25, 2009 Amendment #10 to Section 2 - Ambient Air Monitoring Program for the 130 Liberty Street Deconstruction Project submitted by TRC Environmental Corporation on behalf of the Lower Manhattan Development Corporation for 130 Liberty Street in lower Manhattan. This amendment addresses the relocation of air monitoring equipment for one of the on-site sampling locations.

Based on our review of the aforementioned amendment, EPA accepts the November 25, 2009 Amendment #10 to Section 2 - Ambient Air Monitoring Program for the 130 Liberty Street Deconstruction Project.

EPA's acceptance is not intended as a review and/or acceptance of any structural engineering and safety matters or requirements for the protection of worker safety and health or for fire protection and safety at 130 Liberty Street. EPA is relying on the New York City Department of Building's, the U.S. Department of Labor Occupational Safety and Health Administration's and the New York City Fire Department's expertise in these areas, respectively.

Thank you.

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Subject

Amendment #10 to Section 2 -
Ambient Air Monitoring Program
Plan for 130 Liberty Street
(Revised)

To: Regulators,

Please find enclosed, for review and consideration of approval a revised version of , Amendment #10 to Section 2 - Ambient Air Monitoring Program Plan for the 130 Liberty Street Abatement and Deconstruction project.

This Amendment (with attachments) addresses the relocation of air monitoring equipment for one of the on-site sampling locations. The attached files reflect review comments provided in a telephone call with USEPA yesterday afternoon.

Please note that as per the email directive received from Cas Holloway of the Mayor's Office, TRC is submitting this request to the persons included in this email with the understanding that they will determine if any other City Agencies must review.

Upon review, please feel free to call if there are any questions
(978-656-3551)

Regards

Gary Hunt/TRC
Project Manager
130 liberty Street Air Monitoring Program

(See attached file: Figure1_AMP_Amendment#10.pdf)(See attached file:
Figure4_AMP_Amendment#10.pdf)(See attached file:

AMP_Amendment#10_112509.pdf)

[attachment "QAPP_Amendment#10_010710.pdf" deleted by Emmet Keveney/R2/USEPA/US] [attachment "AMP_Amendment#10_010710.pdf" deleted by Emmet Keveney/R2/USEPA/US] [attachment "Figure1_AMP_Amendment#10.pdf" deleted by Emmet Keveney/R2/USEPA/US] [attachment "Figure4_AMP_Amendment#10.pdf" deleted by Emmet Keveney/R2/USEPA/US] [attachment "Figure7-1_QAPP Amendment10.pdf" deleted by Emmet Keveney/R2/USEPA/US] [attachment "Figure7-3_QAPP_Amendment10.pdf" deleted by Emmet Keveney/R2/USEPA/US]

(See attached file: QAPP_Amendment#10_010710.pdf)(See attached file: AMP_Amendment#10_010710.pdf)

(See attached file: Fig1_AMP Amendment#10_rev010710.pdf)(See attached file: Fig4_AMP Amendment#10_rev010710.pdf)(See attached file: Fig7-1_QAPP Amendment#10_rev010710.pdf)(See attached file: Fig7-4_QAPP Amendment#10_rev010710.pdf)

QAPP AMENDMENT FORM: Amendment # 10

DATE FORM SUBMITTED: 01/07/10

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

AMENDMENT #10

This Amendment addresses the relocation of air monitoring equipment for one of the on-site sampling locations. TRC has been requested by the building owner to remove the air monitoring equipment from the north side Liberty Street Sidewalk Bridge (Station #10 and #100). The Station #10/#100 complex includes program collocated samplers, PM10 FRM samplers as well as the ground level meteorological station. All of this equipment needs to be moved to a new location. The most appropriate relocation area for this equipment is in the northeast area on the Greenwich Street Sidewalk Bridge just off the northeast corner of the building.

Attached to this Amendment is a photograph and three-dimensional diagram (Figure 7-4) depicting the current and proposed locations. The new location will be identified as Station # 20/200.

Reason for Amendment:

TRC has been requested by the building owner to remove the air monitoring equipment from the north side at the level of the Liberty Street Sidewalk Bridge (Station #10 and #100) as this bridge is being removed within the next two months.

Sections of QAPP Affected:

Figure 7-1 (Site Location Map and Proposed Ambient Air Monitoring Locations): This figure will change due to the relocation of Station #10 and #100, which was initially Station #3 on this figure. A revised Figure 7-1 is attached to this Amendment.

Table 7-3 (Phase II – Structural Deconstruction Phase Sampling and Analysis Summary): This table has been updated to be consistent with Table 5 of the Air Monitoring Program Plan. “Roof Top and Scaffolding” in the Location column has been changed to “Off-Site Roof Top and Scaffolding.”

Table 14-1 (Sample Numbering Scheme): This table has been updated to include Station 20 and to include up-to-date information on the operation dates of the remaining stations.

Amendment #7, Table 7-4a (attached to this Amendment): The table has been updated to account for the new Station #20. The actual location of the ground level meteorological station has also been modified as it is moving to the Greenwich Street sidewalk bridge.

Amendment #7, Figure 7-4 (attached to this Amendment): This figure has been updated to remove Station #10 and show Station #20 located at the Greenwich Street sidewalk bridge.

Date Implemented: January 2010

**Table 7-3. Phase II – Structural Deconstruction Phase Sampling and Analysis Summary
Updated: January 2010 (Amendment #10)**

Location	Parameter(s)	Sample Frequency	Analysis Method
Site Area	Mercury (vapor/gas)	Each Day	Lumex, portable mercury analyzer
Site Area	Visible dust emissions	Each Day	Visual observation
Ground/Street Level (4 Locations)	1. Asbestos 2. Silica	Each Day (asbestos and silica are sampled during work shift)	1. TEM/SEM 2. XRD
	3. Metals 4. PCDDs/PCDFs 5. PAHs 6. PCBs 7. Mercury (total)	Each Day (24 hr. Basis)	3. ICP/MS 4. HRGC/HRMS 5. GC/MS 6. GC/ECD 7. Iodated Carbon Trap/CVAFS
	8. PM ₁₀ 9. PM _{2.5}	Continuously “Real-Time” Each Day (PM ₁₀ and PM _{2.5} on 24 hour basis at each location; PM ₁₀ and PM _{2.5} reference sampler at 1 location per day on 24-hour basis with location changed monthly)	8. EBAM/Gravimetric 9. EBAM/Gravimetric
Off-Site Roof Top and Scaffolding ² (4 locations on roof top and 4 locations on scaffolding)	1. Asbestos 2. Silica	Each Day (asbestos and silica are sampled during work shift)	1. TEM/SEM 2. XRD
	3. Metals 4. PCDDs/PCDFs 5. PAHs 6. PCBs 7. Mercury (total)	Each Day (24 hr. Basis)	3. ICP/MS 4. HRGC/HRMS 5. GC/MS 6. GC/ECD 7. Iodated Carbon Trap/CVAFS
	8. PM ₁₀ 9. PM _{2.5}	Continuously “Real-Time” Each Day (PM ₁₀ and PM _{2.5} on 24 hour basis at each location; PM ₁₀ and PM _{2.5} reference sampler at 1 location per day on 24-hour basis with location changed monthly)	8. EBAM/Gravimetric 9. EBAM/Gravimetric
Roof Top Location	Meteorological Monitoring ¹	Continuously “Real-Time” Each Day	

¹Meteorological monitoring will include the following parameters: wind speed, wind direction, and ambient temperature.

²If Phase I Asbestos and COPC Abatement proceeds below the scaffold monitors, then additional air monitoring for metals utilizing NIOSH methods will be conducted at the exhaust manifolds on the lowest elevation of the work area grouping.

Table 7-4a (QAPP Amendment #10)
Monitoring Station Summary, 130 Liberty Street Deconstruction as of January 2010

Station	Location Description in Plan	Location Description in QAPP		Actual Location	Actual Level	Start-up Date
		Site Location	Direction From 130 Liberty			
Ambient Air Monitoring Stations						
Station 1	Southwest of building (Washington St./Albany St.) at ground level	Ground Level - Washington Street/Albany Street	Southwest Corner	Southwest Area	Sidewalk Bridge	9/14/2005
Station 2	Southeast of building (Albany St./Greenwich St.) at ground level	Ground Level - Albany Street/Greenwich Street	Southeast Corner	Southeast Area	Sidewalk Bridge	9/14/2005
Station 4	Northwest of building (Washington St./Cedar St.) at ground level	Ground Level - Washington Street/Cedar Street	Northwest Corner	Northwest Area	Street	9/14/2005
Station 5	Off-site roof top location (124 Liberty Street - FDNY 10-10 House)	Roof Top Off Site - 124 Liberty Street/FDNY 10-10 House	Northeast	Firehouse #10	Roof	9/14/2005
Station 10	Not suggested in Plan - Replaced Station 3	Not suggested in QAPP - Replaced Station 3		North Side	Sidewalk Bridge	9/19/2005
Station 11	Off-site roof top location (90 Trinity Place – School)	Roof Top Off Site - 90 Trinity Place - School	Southeast	90 Trinity Place	Roof	10/5/2005
Station 12	Off-site roof top location (110 Greenwich Street)	Roof Top Off Site - 110 Greenwich Street	South	110 Greenwich Street	Roof	10/6/2005
Station 13	Off-site roof top location (85 West Street – Marriott Hotel)	Roof Top Off Site - 85 West Street - Marriott Hotel	Southwest	Marriott Hotel 38th Floor	Roof	10/5/2005
Station 14	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Southwest Corner	West Face - South end at corner	Scaffolding	In effect on 10th floor as of 11/19/05; in effect on 20th floor as of 12/11/05; in effect on 30th floor on 1/10/07; in effect on 20th floor on 3/11/07 with exception of silica which remained on 30th floor until 6/14/07; silica in effect on 29th floor on 6/15/07; in effect on 15th floor on 6/25/07 through 5/30/09 with the exception of silica which floated between the 29th and 22nd floor (**)
Station 15	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Southeast Corner	South Face - East end at corner	Scaffolding	
Station 16	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Northeast Corner	East Face - North end at corner	Scaffolding	
Station 17	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Northwest Corner	North Face - West end at corner	Scaffolding	
Station 20	Not suggested in Plan - Replaced Station 10	Not suggested in QAPP - Replaced Station 10	Northeast Corner	Northeast Area	Sidewalk Bridge	1/4/2010
Meteorological Monitoring Stations						
Roof Station	Roof top of 130 Liberty Street until onset of deconstruction, at which point the station will be collocated with one of the off site rooftop air monitoring stations	Roof top of 130 Liberty Street until onset of deconstruction, at which point the station will be collocated with one of the off site rooftop air monitoring stations		Building Roof	Roof	In effect as of 9/14/05. Moved to the Marriott Hotel roof on 2/27/07.
Ground Station	Not Suggested in Plan	Not Suggested in QAPP		North Side	Sidewalk Bridge	11/2/2005 - station relocated 01/04/10
Ground Station	Not Suggested in Plan	Not Suggested in QAPP		Northeast Area	Sidewalk Bridge	1/4/2010

Notes:

There was a minor move of the Meteorological Ground Level Station on 4/24/2007 due to construction logistics; however, the location description remains the same.

Stations 3, 6, 7, 8, 9, 14, 15, 16, and 17 are no longer in service. Station 10 is currently out of service as of 01/04/10 when Station 20 commenced.

** As per the Ambient Air Monitoring Plan Amendment #5, the location of the silica monitors will move with deconstruction.

Plan - Ambient Air Monitoring Plan, Section 2 of the Deconstruction Plan submitted September 7, 2005

QAPP - Ambient Air Monitoring Quality Assurance Project Plan

Table 14-1. Sample Numbering Scheme
Updated: January 2010 (QAPP Amendment #10)

Sample Locations	Numbering Scheme
Station 1	parameter – ST 1 – mmddyy
Station 2	parameter – ST 2 – mmddyy
Station 3 ¹	parameter – ST 3 – mmddyy
Station 4	parameter – ST 4 – mmddyy
Station 5	parameter – ST 5 – mmddyy
Station 6 ²	parameter – ST 6 – mmddyy
Station 7 ²	parameter – ST 7 – mmddyy
Station 8 ²	parameter – ST 8 – mmddyy
Station 9 ²	parameter – ST 9 – mmddyy
Station 10 ³	parameter – ST 10 – mmddyy
Station 11	parameter – ST 11 – mmddyy
Station 12	parameter – ST 12 – mmddyy
Station 13	parameter – ST 13 – mmddyy
Station 14 ⁴	parameter – ST 14 – mmddyy
Station 15 ⁴	parameter – ST 15 – mmddyy
Station 16 ⁴	parameter – ST 16 – mmddyy
Station 17 ⁴	parameter – ST 17 – mmddyy
Station 20	parameter – ST 20 – mmddyy
Field/Trip Blanks	parameter – FBB – mmddyy
Field Duplicates	Append “0” to original sample ID
Cooler Temperature Blank	“Cooler Temperature Blank”
Example Sample Location ID: PAH-ST1-082205	
Example Field Duplicate Pair ID: PAH-ST10-082205/PAH-ST100-082205	
1 – In use from 9/14/05 through 9/16/05 2 – In use from 9/14/05 through 9/28/05 and 7/6/06 through 9/21/06 3 – In use from 9/16/05 through 01/04/10 4 – In use from 9/14/05 through 5/30/09	