



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

April 29, 2010

Mr. Edward A. Gerdtz
Managing Principal
TRC Environmental Corporation
1430 Broadway – 10th Floor
New York, New York 10018

Re: April 28, 2010 Proposed Amendment #11 – Ambient Air Monitoring Program Plan for the 130 Liberty Street Abatement and Deconstruction Project, September 7, 2005, 130 Liberty Street, New York, N.Y.

Dear Mr. Gerdtz:

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the April 28, 2010 “Proposed Amendment #11 to the September 7, 2005 Section 2 – Ambient Air Monitoring Program Plan of 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.

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 above-referenced proposed amendment.

EPA’s acceptance is not intended as a review and/or acceptance of 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.

EPA will continue to work with our regulatory partners to monitor the 130 Liberty Street activities throughout the execution of the project.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Evangelista". The signature is fluid and cursive, with a large initial "P" and a stylized "E".

Pat Evangelista
Director, Office of Strategic Programs

cc: Richard Mendelson, OSHA
Christopher Alonge, NYSDOL
Krish Radhakrishnan, NYCDEP
Christopher Santulli, NYCDOB
Thomas Kunkel, LMCCC
Michael Weinlein, FDNY
Suzanne Mattei, NYSDEC

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 11

DATE FORM SUBMITTED: 04/28/10

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

AMENDMENT #11

This Amendment describes air monitoring activities that will take place during deconstruction activities and other activities that remain at 130 Liberty Street. This amendment assumes that remnant fireproofing on floors 15-6 and 3-Basement A will be removed concurrently with the deconstruction of each floor. Currently there are eight (8) stations, including four (4) ground-level and four (4) off-site roof-level stations operating in accordance with the Ambient Air Monitoring Plan dated September 7, 2005. The abatement phase has been completed and deconstruction is in progress. Regulators will be notified via email at least 24 hours prior to each upgrading transition and at least 48 hours prior to each downgrading transition of the monitoring network. This amendment supersedes AAMP Amendment # 8 dated July 8, 2009.

From the 17th floor through the 16th and the 5th floor through the 4th floor and Basement B:

During continued deconstruction, eight (8) stations (unless amended at a later date), including four (4) ground-level and four (4) off-site roof-level stations, will monitor for silica and PM₁₀ continuously on a daily basis. In the event that “pockets of contamination” are identified (i.e., sources of Contaminants of Potential Concern [COPCs] are newly discovered) as per Section V.D.25 of the May 14, 2009 Implementation Plan, deconstruction work will cease in the immediate area and all stations will immediately commence daily sampling for asbestos and metals (excluding mercury) in addition to silica and PM₁₀ and weekly sampling for PAHs and PCDDs/PCDFs in accordance with the Ambient Air Monitoring Plan dated September 7, 2005 (analysis will be performed only on the sample collected at the one station with the highest PM₁₀ measurement, as a 24-hour average) prior to the commencement of cleanup work. These monitoring activities will continue until the cleanup work has been completed. A site-specific variance reopening request and implementation plan amendment shall be submitted to address appropriate procedures for this potential cleanup scenario, including the scope and extent of any necessary work stoppage.

From the 15th floor through the 6th floor and from the 3rd floor through Basement A:

Eight (8) stations (unless amended at a later date), including four (4) ground-level and four (4) off-site roof-level stations will continuously monitor for silica, asbestos, PM₁₀, and metals (excluding mercury). Sampling will be performed for PAHs and PCDDs/PCDFs once per week in accordance with the Ambient Air Monitoring Plan dated September 7, 2005 and analysis will be performed only on the sample collected at the one station with the highest PM₁₀ measurement, as a 24-hour average. The use of the highest PM₁₀ measurement as the basis for sample selection is consistent with the approach contained in the September 7, 2005 Air Monitoring Plan. These monitoring activities will be in place from before the first impact of a given stair enclosure until all sheetrock, fireproofing and steel with remnant fireproofing have been removed from that stair enclosure, even on days when no work activities are occurring. Upon completion of the removal of the sheetrock, fireproofing and steel with remnant

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fireproofing for a given stair enclosure, TRC will conduct a visual inspection to verify that all sheetrock and fireproofing have been removed. Following a successful TRC visual inspection, TRC will notify the regulators and then downgrade monitoring activities to monitor only for silica and PM₁₀ continuously on a daily basis. Deconstruction will be occurring on one floor at a time (stairwell deconstruction will be sequenced with deconstruction of the floor itself) and will continue downward during deconstruction of the building.

TRC will notify regulators via email prior to any transitioning of the monitoring network. Regulators will be notified at least 24 hours prior to an upgrade in monitoring due to remnant fireproofing removal work activities resuming on site. Regulators will again be notified at least 48 hours prior to a downgrade in monitoring once remnant fireproofing removal work activities are completed on a given stair enclosure. Any downgrading of the monitoring network will occur at the end of the 24-hour monitoring period. In the event that a weekly sampling session is in progress for PAHs and PCDDs/PCDFs, the session will resume immediately upon resumption of remnant fireproofing removal work activities (e.g. – if four (4) days of a planned seven (7) day weekly session is completed, the remaining three (3) days of the session will resume concurrent with resumption of remnant fireproofing removal work activities).

Reason for Amendment:

The original September 7, 2005 Ambient Air Monitoring Program Plan identified target compounds or COPCs on the basis of their association with contaminated materials (e.g., WTC dusts, 130 Liberty Street building materials, etc) to be handled and removed from the building during the abatement phase of the program. These COPCs included silica, asbestos, mercury, metals, PCDDs/PCDFs, PAHs, PCBs, PM_{2.5} and PM₁₀. Amendment # 8 modified the target compound or COPC list for use during the remaining phases of deconstruction monitoring as well as reduced the number of monitoring stations in operation. This Amendment serves to adjust air monitoring frequency based upon actual remnant fireproofing removal work activities and clarifies the procedure for notification to regulators regarding any transition of the monitoring network.

Since fireproofing is still present on the stairwell included in floors 15-6 and 3-basement A, sampling will be upgraded during the active deconstruction of this area to monitor daily for the metals (excluding mercury) and asbestos in addition to PM₁₀ and silica and once per week for PAHs and PCDDs/PCDFs, since the fireproofing material may contain these COPCs. Sampling will be downgraded to monitor daily for PM₁₀ and silica once clean up of the affected stair enclosure is completed.

Sections of Air Monitoring Plan Affected:

Table 2 (Summary of Sampling and Analysis Methods): This section will be revised to show the change in target parameters and stations being monitored for the remainder of deconstruction based on the above discussions.

Section 6.4 (Phase II – Structural Deconstruction): This section will be revised to reflect the target parameters and stations being monitored for the remainder of deconstruction based on the above discussions.

Table 5 (Phase II – Structural Deconstruction Phase Sampling and Analysis Summary): This table will be revised to reflect the target parameters and stations being monitored for the remainder of deconstruction based on the above discussions.

Date Implemented: April 2010