

STATE OF NEW YORK - DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
ENGINEERING SERVICES UNIT

STATE OFFICE BUILDING CAMPUS
 ALBANY, N.Y. 12240-0010

PETITION FOR A VARIANCE OR OTHER RELIEF
 (NOT APPLICABLE FOR PUBLIC EMPLOYERS)

PREPARE APPLICATION IN TRIPLICATE
 SUBMIT ALL APPLICATIONS TO THE
 ADDRESS SHOWN WITH A CERTIFIED
 CHECK OR MONEY ORDER (made payable to
 the Commissioner of Labor)

1. NAME AND ADDRESS OF PETITIONER (AGENT) Weston Solutions, Inc. 85 Wellington Court Yorktown Heights, NY 10598	4. FOR AN ASBESTOS PROJECT ONLY. PETITION OR AGENT IS OR HOLDS (Check appropriate box) <input type="checkbox"/> Asbestos Contractor - License No. _____ <input type="checkbox"/> Air Monitor - Certificate No. _____ <input type="checkbox"/> Project Designer - Certificate No. _____ <input type="checkbox"/> Project Monitor - Certificate No. _____ <input type="checkbox"/> Management Planner - Certificate No. _____ <input checked="" type="checkbox"/> Other (Specify) <u>Asb handler Lic # 99-0844</u>
2. PETITIONER'S TELEPHONE NUMBER 732-417-5800 (Robert Lewin, Agent for petitioner)	
3. PETITIONER'S FEDERAL EMPLOYER IDENTIFICATION NUMBER (FEIN) <u>23-1501990</u>	
5. AFFECTING PREMISES KNOWN AS <u>130 LIBERTY STREET</u>	5. STREET ADDRESS OF SUCH PREMISES <u>130 LIBERTY STREET</u>

7. These premises are situated on South side of 130 Liberty Street
 NORTH-EAST-SOUTH-WEST STREET-AVENUE-ROAD
 (Check one) in the CITY TOWN VILLAGE OF New York County of New York

8. NAME AND ADDRESS OF ALL DESIGNATED EMPLOYEE REPRESENTATIVES (Enter "None" if no employee organization)
*****This question is not applicable to an Asbestos Project*****

THE PETITIONER HEREBY PETITIONS THE COMMISSIONER OF LABOR FOR A VARIANCE (OR OTHER RELIEF) FROM THE REQUIREMENTS OF THE LABOR LAW, ORDERS OF THE COMMISSIONER OF LABOR REQUIRING COMPLIANCE WITH THE STATE BUILDING CONSTRUCTION CODE, THE NEW YORK STATE UNIFORM FIRE PREVENTION AND BUILDING CODE AND/OR THE RULES OF THE COMMISSIONER OF LABOR AS STATED BELOW.

A. CITATION

LIST THE APPLICABLE SECTION AND PARAGRAPH OF THE RELEVANT LAW, CODE, OR REGULATION (S) FOR WHICH A VARIANCE IS BEING REQUIRED.

9. LABOR LAW <u>ARTICLE 30</u>	7. STATE BUILDING CONSTRUCTION CODE <u>Not Applicable</u>	7. UNIFORM FIRE PREVENTION CODE <u>Not Applicable</u>	7. INDUSTRIAL CODE RULE NUMBER <u>ICR 56</u>
13. ORDERS ISSUED: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes if yes, enter date issued	9. ISSUED BY: <input type="checkbox"/> STATE INSPECTOR <input type="checkbox"/> LOCAL INSPECTOR	9. ISSUED TO: <input type="checkbox"/> OWNER <input type="checkbox"/> AGENT <input type="checkbox"/> LESSEE (Enter name appearing on Notice of Violation) _____	

16. QUOTE THE TEXT OF THE ORDERS AS GIVEN ON THE NOTICE OF VIOLATION AND ORDER TO COMPLY, if applicable.
Not Applicable

17. IF A VARIANCE HAS BEEN GRANTED PREVIOUSLY COVERING THE SAME SECTION AND PARAGRAPH AS SPECIFIED ABOVE IN IT 5-8, LIST THE CASE NUMBER AND DATE SUCH VARIANCE WAS GRANTED.
98-0787 Variance to utilize Shredders, Chutes and Bladder Bags (6/16/98) and 00-1437 (10/24/00)

B. DESCRIPTION OF PREMISES
(To be filled out only when pertinent to the petition)

18. Data building was constructed 1976 18. No. Stories: Front 41 Rear 41
 Wood; Non-fireproof; Fireproof;L
 20. Construction of building is (Masonry walls, wood floors and roof) (Masonry walls, concrete floors and roof)
 21. Size of lot: At street level Feet front 200 Feet deep 200
 22. Size of building: At street level Feet front 200 Feet deep 200
 23. Size of building: At typical floor level Feet front 200 Feet deep 200

24. Use of each floor and maximum number of persons on each floor are as follow: **Unoccupied**

Floor	Equipped with Automatic Sprinklers		Use	Present		Proposed	
	Yes	No		Men	Women	Men	Women
Cellar							
1							
2							
3							
4							
5							

C. REASON FOR REQUEST FOR VARIANCE

25. State the grounds for a variance (or other relief) setting forth difficulties and/or hardships involved in complying with the requirements stated above. Failure to complete this section may result in dismissal or denial of this petition.

Refer To Attachment

D. PROPOSAL

26. State the proposal, if any, for securing safety or protecting health without literal compliance with such requirements.

Refer To Attachment

***** This question is not applicable to an Asbestos Project*****

27. I affirm that a copy of this Petition

has been set or will be sent within 3 days of sending this Petition to the Commissioner of Labor, to all designated employee representatives by certified mail, return receipt requested

AND

has been posted or will be posted within one week of sending this Petition to the Commissioner of Labor at the site affected by the variance in an easily accessible location

I certify that the information contained in this Petition is true and accurate

April 11, 2005

Robert F. Lewin, Weston Solutions, Inc., as Agent for Petitioner

28. DATE

29. SIGNATURE OF PETITIONER OR PETITIONERS AGENT

Return THREE copies of this application and the \$350.00 fee to the address shown on front (Use additional 8 1/2 x 11 sheets, if necessary)

**130 LIBERTY STREET, NEW YORK, NY
REQUEST FOR VARIANCE
FOR PHASE I: PRE-DEMOLITION CLEANING AND ABATEMENT**

EXECUTIVE SUMMARY

On September 11, 2001, the 130 Liberty Street building ("Building") was severely damaged when debris from the World Trade Center broke hundreds of windows and cut a fifteen story gash in the north façade of the Building. Since September 11, 2001, the Building has been unoccupied. The current owner of the Building, Lower Manhattan Development Corporation ("LMDC"), plans to abate and deconstruct the Building as part of the redevelopment and rebuilding of the larger World Trade Center ("WTC") Site. Currently, plans for the 130 Liberty Street site include underground truck security and bus parking away from the locations of the former WTC Towers 1 and 2 and a proposed fifth office tower which will reduce the building density on the WTC Site and create approximately 30,000 square feet of open space for public use.

This request for a variance arises from the commitment by LMDC, its consultants, and its contractor to comply in all respects with federal, state, and local laws applicable to the deconstruction of 130 Liberty Street. By doing so, LMDC, its consultants and its contractor will prevent potential exposure of workers and the public to asbestos fibers and other contaminants in the Building, safeguard workers and the public from construction debris and materials, and maintain a safe working and neighborhood environment. Accordingly, LMDC, its consultants and its contractor propose to (i) conduct the abatement work in a protective and expeditious manner in full compliance with applicable law, thereby protecting workers and the public; (ii) to the extent feasible, bulk load waste materials to minimize truckloads, traffic congestion, and air pollution and noise concerns associated with vehicles servicing the site; and (iii) address letters from the regulatory agencies concerning the previously submitted draft Phase I Deconstruction Plan.

This Request for Variance was developed and is intended to meet the spirit and intent of the law, by protecting workers and the general public from exposure to asbestos fibers and other contaminants of potential concern (COPC), both inside and outside the Building, in the vicinity of 130 Liberty, and during shipment and ultimate disposal of the deconstruction debris and wastes. This Request for Variance, at the same time, addresses unprecedented operational opportunities and challenges arising from unique conditions caused by the events of September 11th and the logistical realities of cleaning and deconstructing a high-rise building in an active urban setting.

This Request for Variance is being submitted to the New York State Department of Labor ("NYS DOL") due to the presence of asbestos in the Building. Eventually, due in part to the presence of contaminants in the Building other than asbestos, the revised Deconstruction Plan for the Building will be submitted to NYSDOL as well as other federal, state, and city regulatory agencies prior to the start of deconstruction.

NATURE OF THE WORK

The proposed cleanup and abatement will be conducted so that the Building can be safely deconstructed to allow for redevelopment of the WTC Site. This project entails: (i) the general area cleanup of WTC dust and debris, which as stated by the regulators must be treated as asbestos, (ii) removal and disposal of installed porous and certain non-porous building materials and

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components contaminated by WTC dust and debris, (iii) cleaning and salvage of certain installed non-porous building equipment and components contaminated by WTC dust and debris, and (iv) removal of building materials containing asbestos which were present in the Building prior to September 11th, 2001 (referred to herein as "ACBM"), primarily within the Building interior. During the cleanup and abatement, a minimum buffer zone of two floors, as previously required by NYSDOL, will be maintained between the active abatement (Phase I) area and the exterior abatement/structural demolition (Phase II) portion of the project.¹ This variance request primarily addresses Phase I of the cleaning and deconstruction; it is anticipated that an additional variance request will be submitted in the future addressing Phase II.

REASON FOR REQUESTING A VARIANCE

LMDC, its consultants and its contractor are committed to compliance with applicable law throughout the cleaning and deconstruction of the Building. Accordingly, the Request for Variance is intended to comply with applicable federal, state and local law. It is the goal of LMDC, its consultants, and its contractor to conduct the proposed cleanup and abatement in a manner which (i) will not expose the general public to asbestos, (ii) will minimize worker exposure to asbestos through the use of appropriate controls and personal protective equipment, (iii) will minimize adverse impacts of the project on the adjacent community, (iv) will address the practical operational opportunities and challenges presented by the Building and the Building conditions, and (v) will prepare the Building for exterior cleaning, abatement and deconstruction to be conducted during Phase II.

PROPOSED EXEMPTIONS

We are requesting exemption from the following sections of Title 12 NYCRR Part 56, also known as Industrial Code Rule ("ICR") 56:

56-2.1, 56-2.2 – Limited Exemption for Specialty Trades

We are requesting limited exemption from this section based on the following:

- a. The Building has been vacant for a period in excess of three years. Therefore, concern exists about the reliability and operability of various Building system components necessary to support the project.
- b. NYSDOL and other regulatory agencies have stated that the interior of the entire structure (with the exception of previously cleaned areas of the "Gash Area", Cellar A Decon Areas and Loading Dock) is contaminated with asbestos. Therefore, no non-contaminated access route exists to access Building systems to repair or replace system components to ensure the operability of critical system components for the duration of the project.
- c. Specialty building trades which are not normally required to support abatement projects may be required to support operation, repair or maintenance of critical Building systems during the project. These specialty trade personnel may require access to or through contaminated areas.
- d. The contractor who employs specialty trade personnel might not possess a valid asbestos handling license issued by NYSDOL.

¹ NYSDOL letter to USEPA dated January 7, 2005, page 4, 1st bullet.

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To address the above, the following is proposed:

I. Specialty Trade Contractor

1. The contractor who employs specialty trade personnel requiring either occasional or routine access to the Building shall be exempted from the NYSDOL and New York City Department of Environmental Protection (NYCDEP) licensing requirements and procedures and will not need to possess a valid asbestos handling license issued by NYSDOL or NYCDEP. However, all specialty trade personnel entering the Building shall comply with the site specific Health and Safety Plan ("HASp").

II. Specialty Trade Personnel – Occasional Access

1. Specialty trade personnel with expertise in maintenance or repair of critical Building system components who are not required to support routine on-going operations, but who nonetheless require periodic access to the Building, shall be exempted from NYSDOL and NYCDEP certification requirements.
2. Specialty trade personnel shall receive asbestos awareness and site-specific HASp safety training prior to commencing such work. Safety training topics shall include the scope of the abatement project, project specific requirements as detailed in the site-specific HASp, proper selection and use of Personal Protective Equipment ("PPE") and precautions to observe during the performance of their work.
3. Prior to performance of specialty trade work, certified abatement personnel possessing all NYSDOL and NYCDEP required certifications will inspect the floor and equipment surfaces in the immediate area where work will be performed. Suspect debris identified on floor or equipment surfaces shall be thoroughly wetted and bagged for disposal as asbestos material/asbestos waste prior to work by specialty trade workers.
4. Personnel assigned solely to specialty trade work shall not disturb intact ACBM but may incidentally disturb other non-intact ACBM or WTC dust.

III. Specialty Trade Personnel – Routine Access

1. Specialty trade personnel performing limited or special tasks in preparation for or ancillary to the project, or as necessary to support routine on-going operations, shall be trained and certified by NYSDOL as Restricted Asbestos Handler - Allied Trades, at a minimum.
2. Personnel assigned solely to specialty trade work shall not disturb intact ACBM but may incidentally disturb other non-intact ACBM or WTC dust.

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56-5.1 - Handling of Waste

We request exemption from this section based on the following:

- a. It is anticipated that a high volume of asbestos waste, including ACBM, WTC dust and asbestos-contaminated waste, will be generated during this project. Therefore, conventional bagging of all asbestos waste on a project of this size would result in the generation of very large waste volumes for handling and packaging, an increase in the number and/or size of trucks required for waste transportation, an increase of off-site burial volume, and a requirement that workers hand process waste in a time- and labor-intensive manner. Therefore an exemption is being requested to reduce the volume of asbestos waste trucked through Lower Manhattan, reduce the volume of waste to be placed in landfills, and minimize workers' direct handling and packaging of asbestos-contaminated waste.
- b. Given the size and layout of the Building, the use of carts for the removal of waste via the stairwell or elevators is extremely inefficient.
- c. Accordingly, a portable shredder may be utilized for processing of compatible building materials waste streams (except for ACBM, which will not be processed through the shredder) contaminated with WTC dust such as, for example, wall board. All such materials will be treated and disposed of as asbestos wastes.
- d. Certain materials when wetted may result in blockage within the portable bulk shredder system. Therefore, these waste streams may be processed utilizing a double lined bulk transfer container with a closing lid and transferred directly into a double lined disposal container using a dust-free inclined chute. All such materials also will be handled and disposed of as asbestos wastes in accordance with applicable federal, state and local laws.
- e. Upon removal, ACBM and contaminated spray-on fire-proofing will be packaged into properly labeled leak-tight containers (e.g., bags, gaylord boxes, drums) for handling and disposal as asbestos wastes in accordance with applicable federal, state and local laws.

Based on the above, the following is proposed:

I. Use of a Portable Shredder

1. If a portable shredder is utilized, upon removal from the substrate, waste materials identified above (other than ACBM) shall be thoroughly wetted and placed into a portable bulk shredder. These materials shall be wetted while in the portable bulk shredder.
2. Waste processed through the portable bulk shredder shall be packaged into properly labeled leak tight containers for disposal as asbestos waste in accordance with applicable federal, state and local laws. Local High Efficiency Particulate Air ("HEPA") ventilation exhaust equipment shall be utilized to minimize and filter emissions from the portable bulk shredder system.
3. Porous waste material that is not compatible with use of a portable bulk shredder shall be bagged, boxed or drummed directly or, processed in accordance with Item II of this section, in each case as asbestos waste.

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4. Removal of non-porous, non-movable salvage shall be performed in compliance with 56-8.2(a).

II. Use of a Dust-Free Inclined Chute Directly into a "Bladder" Bag Installed within the Waste Container

1. If the bladder bag waste container option is utilized, the removed ACBM (and other asbestos waste if deemed suitable by the contractor) shall be transported for disposal in a hinged-top six-sided hard wall container ("disposal container") lined with a "bladder" bag. The "bladder" bag shall consist of a pre-fabricated fire-retardant multi-layered leak-tight container with a nominal 20-millimeter ("mil") thickness.
2. The chute shall be air and dust tight along its lateral perimeter and at the terminal connection to the "bladder" bag at ground level.
3. Prior to transport from the site, the bladder bag within the disposal container shall be wrapped and sealed and the top of the disposal container shall be closed and sealed over the top of the load. The upper end of the chute shall be furnished with a hinged lid, to be closed when the chute is not being used.
4. Disposal containers staged and loaded exterior to the Building or active work area shall be enclosed within a fully framed and sheathed enclosure of sufficient size to accommodate the entire disposal container. The interior of the disposal container enclosure shall be fully lined with at least two layers of six millimeter (6-mil) polyethylene sheeting ("poly") and sealed with tape. A minimum of four air changes per hour shall be maintained within the disposal container enclosure.
5. Prior to transport from the work site, the disposal container will be disconnected from the chute and sealed air and dust tight utilizing 6-mil poly and tape. The asbestos waste will be transported in the disposal container in accordance with applicable federal, state and local laws.
6. Asbestos contaminated tools and equipment shall be decontaminated by utilizing the decontamination enclosure system ("personal decon") in conjunction with the applicable requirements of Subpart 56-5.1. Storage of waste materials in the clean room area of the personal decon shall be prohibited.
7. The exterior surfaces of waste containers shall be thoroughly decontaminated by wet wiping and/or HEPA vacuuming prior to release from the site.

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III. Use of a Dust-Free Inclined Chute Directly into a Double Lined Waste Container

1. If the chute to double-lined container option is utilized, removed ACBM and other asbestos wastes shall be transported for disposal in a hinged-top six-sided hard wall container ("disposal container") lined with a two layers of 6-mil fire-retardant poly.
2. The chute shall be air and dust tight along its lateral perimeter and at the terminal connection to the Double Lined Waste Container at ground level.
3. Prior to transport from the site, the 6-mil poly within the disposal container shall be wrapped and sealed and the top of the disposal container shall be closed and sealed over the top of the load. The upper end of the chute shall be furnished with a hinged lid, to be closed when the chute is not being used.
4. Disposal containers staged and loaded exterior to the Building or active work area shall be enclosed within a fully framed and sheathed enclosure of sufficient size to accommodate the entire disposal container. The interior of the disposal container enclosure shall be fully lined with at least two layers of 6-mil poly and sealed with tape. A minimum of four air changes per hour shall be maintained within the disposal container enclosure.
5. Pending disposal, asbestos-contaminated waste shall be placed in the disposal container with at least 6-mil plastic draped loosely over the sides to facilitate being wrapped over the top of the load and sealed prior to transport from the site.
6. Prior to transport from the work site, the disposal container will be disconnected from the chute and sealed air and dust tight utilizing 6-mil poly and tape. The asbestos waste will be transported in the disposal container in accordance with applicable federal, state and local laws.
7. Asbestos contaminated tools and equipment shall be decontaminated by utilizing the personal decon in conjunction with the applicable requirements of Subpart 56-5.1. Storage of waste materials in the clean room area of the personal decon shall be prohibited.
8. The exterior surfaces of waste containers shall be thoroughly decontaminated by wet wiping and/or HEPA vacuuming prior to release from the site.

56- 6.1(j) - Exhaust Location

We seek exemption from the minimum distance requirement of 50 feet from a facility air intake receptor based on the following:

- a. The subject facility is a 40 floor high-rise office building in Manhattan.
- b. Negative ventilation exhausts will be installed to ensure the minimum distance of 50 feet is maintained from air intake receptors in adjacent buildings.

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- c. Existing windows within the facility contain fixed pane glass which is sealed to the Building exterior.

Based on the above, the following is proposed:

1. Exterior louvers associated with mechanical room fresh air intakes will be sealed from the Building interior using two layers of 6-mil poly and tape.
2. Missing windows will be sealed using rigid sheathing, caulk and tape in compliance with ICR 56-8.1(k)(1) and ICR 56-8.1(k)(2), adhering to requirements approved by a New York State Licensed Professional Engineer. The interior surface of the rigid sheathing will be covered with two layers of 6-mil poly and sealed with tape.
3. Exhaust duct hose will be installed and maintained in the work area to avoid damage to the extent possible and shall be inspected on a daily basis to ensure no damage has occurred. Any damage noted shall require the immediate shut down of that negative air machine to allow for repair or, if repair is not possible, the length of exhaust duct shall be replaced prior to placing the unit back into service.
4. Sufficient HEPA ventilation units shall be installed to maintain at least 4 air changes per hour during abatement and clean up activities.
5. Air outlet from the work area shall be at or near floor level. Power tools used to drill, cut into or otherwise disturb asbestos material shall be equipped with HEPA filtered local exhaust ventilation.
6. HEPA ventilation units shall be operated at a maximum of 2 air changes per hour during clearance sampling.
7. HEPA ventilation exhaust will be installed within exterior building openings, where practical. In areas where there are no exterior building openings available, ventilation exhaust will occur at existing window locations. To facilitate those exhausts points, the following procedure will be utilized:
 - The window pane will be secured from the interior and cut along the interior framing.
 - The window will be angled and brought into the work area and either cleaned of WTC dust or disposed of as an asbestos-contaminated material.
 - The interior frame area will be cleaned using wet methods. A rigid barrier with cutouts to accommodate up to six negative air exhaust flex hoses will be inserted into the opening of the interior frame area and all seams shall be sealed using caulk or foam. Flex hose penetrations shall be sealed airtight using caulk, foam or 6-mil poly and tape, as needed.

56-8.1(g) – Movable Objects

Exemption from this section is requested for moveable objects remaining within the work area based on the following:

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- a. Moveable equipment remaining within the negative pressure work area will be either cleaned or removed during the abatement phase (Phase I) of the project. Covering these surfaces with poly will restrict access to these surfaces for cleaning or removal and will not enhance worker safety.

56-8.1(h) – Fixed Objects

We request exemption from this section for fixed objects remaining within the work area based on the following:

- a. Fixed objects within the negative pressure work area will be either cleaned or removed during the abatement phase (Phase I) of the project. Covering these surfaces with poly will restrict access to these surfaces for cleaning, crating or removal and will not enhance worker safety.

56-8.1(i) - Precleaning

Exemption is requested from pre-cleaning of all interior surfaces and the prohibition of disturbing asbestos during pre-cleaning. Pre-cleaning shall consist of cleaning of surfaces over which isolation barriers will be installed and removal of large debris (e.g., building components, materials, wastes) that may inhibit the installation of isolation barriers, the negative pressure system equipment or the movement of personnel on a floor. Once negative pressure work areas have been established, all ACBM and WTC dust and debris will be removed within that work area during the abatement phase of the project.

The Building interior was impacted by WTC dust and debris, and NYSDOL and other regulatory agencies have stated that the interior of the entire structure is contaminated with asbestos. Accordingly, pre-cleaning of the work area would require wetting and removal of WTC dust and debris. However, pre-cleaning of the walls, floors and ceiling surfaces prior to establishing negative pressure work areas provides no additional benefit to either worker or public health and safety since such cleaning will occur under negative pressure during subsequent Phase I abatement activities. Traditional pre-cleaning as required by 56-8.1(i) without negative pressure would actually increase potential exposures and would provide no benefit to workers or the public.

Based on the above, the following is proposed:

1. Loose material on exposed surfaces over which isolation barriers and negative pressure ventilation exhaust duct manifolds will be installed shall be wetted thoroughly with amended water prior to disturbance and/or HEPA vacuumed. Methods that raise dust, such as dry sweeping or vacuuming with equipment not equipped with HEPA filters, shall be prohibited.
2. Large pieces of debris (e.g., building components, building materials) on the floor that may inhibit the installation of isolation barriers, the negative pressure system equipment or the movement of personnel on a floor will be removed and either containerized for proper disposal or, if non-porous material, may be staged for cleaning and salvage during subsequent Phase I abatement activities.

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3. Pre-cleaning shall consist of cleaning of surfaces over which isolation barriers will be installed. HEPA vacuuming or wet wiping of surfaces throughout the work area to clean WTC dust, to remove pieces of debris that inhibit work process as described above, or to remove installed building components/materials will be performed within a negative pressure enclosure during subsequent Phase I abatement activities.

56- 8.1(j) – Isolation Barriers

Isolation barriers conforming with the requirements of 56-8.1(j) shall be constructed. The isolation barriers shall consist of two layers of 6-mil fire retardant poly sealed individually with tape. Small openings may be sealed with expandable foam.

56-7.1(c) and (j) – General Removal Requirements;

56-8.1(k)(1) Through (5) – Isolation Barriers;

56-11.1(b) – Preabatement Settling Period;

56-15.2(b) through (e) – Post Abatement Requirements;

56-17.2(a) – Drying Time

Exemption from these sections is requested based on the following:

- a. The Building exterior construction is fixed pane windows and sealed spandrel panels. Plasticizing of Building and equipment surfaces will restrict access to surfaces requiring cleaning and impede access to building materials and areas requiring abatement.
- b. All interior non-structural building materials will be removed under negative pressure during subsequent Phase I abatement activities.
- c. The project involves concurrent decontamination of non-porous Building and equipment surfaces, disposal of building materials contaminated with WTC dust and debris, and removal of ACBM from within the same negative pressure work area.
- d. Installed ACBM, located above or behind contaminated building materials, will be exposed during interior demolition to permit removal of this material inside of the existing negative pressure work area.
- e. All remaining non-porous interior surfaces/equipment shall be cleaned as part of the post-abatement cleaning process.

Based on the above, the following is proposed:

1. No demolition or abatement shall occur within a negative pressure work area until area preparations and pre-cleaning activities as previously defined are completed.
2. Building materials will be removed using the following general sequencing within each designated work area, as applicable. However, within a given work area or floor several aspects of this sequence may be underway concurrently and/or, to the extent that a safe workplace can be maintained, out of sequence work may occur to facilitate the overall project. Out of sequence work may occur to address field conditions, preferences and/or to improve the

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overall efficiency of the abatement process. The following are the general anticipated sequences of work:

➤ **TYPICAL OFFICE FLOOR GENERAL SEQUENCE:**

- Pre-cleaning as described;
- Area preparation consisting of the installation of HEPA ventilation equipment and isolation barriers in accessible openings along the exterior boundary of the negative pressure work area and establish waste load out decons as desired;
- Limited demolition of walls and ceilings to facilitate work area preparation;
- Installation of isolation barriers in penetrations exposed along the exterior boundary of the negative pressure work area;
- Removal of ACBM flooring and any ancillary demolition of walls required to access such ACBM flooring;
- Demolition of remaining walls and ceilings;
- Removal of ACBM pipe insulation;
- Removal of installed utilities (i.e., conduit, piping, HVAC duct);
- Removal of HVAC duct flange sections containing non-friable ACBM duct seal;
- Removal for decontamination or disposal of large non-porous fixed equipment and components;
- Installation of drop cloths to facilitate removal of spray-on fireproofing and fireproofing removal;
- Decontamination of walker duct and raceways;
- Removal of flooring mastic;
- Detail cleaning of work area; and
- Clearance air monitoring shall be performed at the completion of all work within each negative pressure work area.

➤ **MECHANICAL EQUIPMENT ROOM GENERAL SEQUENCE:**

- Pre-cleaning as described;
- Area preparation consisting of the installation of HEPA ventilation equipment and isolation barriers in accessible openings along the exterior boundary of the negative pressure work area and establish waste load out decons as desired;
- Removal of transite panels serving as louver blanks and installation of isolation barriers in penetrations exposed along the exterior boundary of the negative pressure work area;
- Installation of isolation barriers in penetrations exposed along the exterior boundary of the negative pressure work area;
- Demolition of walls and ceilings;
- Removal of ACBM flooring and any ancillary demolition of walls required to access such ACBM flooring;
- Removal of remaining transite panels;
- Removal of ACBM mechanical insulation;
- Removal of installed utilities (i.e. conduit, piping, HVAC duct);
- Removal of HVAC duct flange sections containing non-friable ACBM duct seal;
- Decontamination or disposal of large non-porous fixed equipment and components;

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- Installation of drop cloths to facilitate removal of spray-on fireproofing and fireproofing removal;
 - Removal of flooring mastic;
 - Detail cleaning of work area; and
 - Clearance air monitoring shall be performed at the completion of all work within each negative pressure work area.
- EXTERIOR GASH AREA GENERAL SEQUENCE:
- Area preparation consisting of the installation of a caulked, sealed barrier with rigid sheathing covered with two layers of fire retardant 6-mil poly on the Building interior side in compliance with ICR 56-8.1(k)(1) and ICR 56-8.1(k)(2), adhering to requirements approved by a New York State Licensed Professional Engineer. This barrier shall enclose the opening in the exterior façade;
 - Installation of HEPA ventilation equipment as required;
 - Demolition of the existing wall separating the gash area from the remaining floor space in order to access the ACBM wall/floor joint tar paper existing at its base;
 - Cleaning of walker ducts/raceways in these areas will be done in conjunction with cleaning of these systems in the adjacent interior containment;
 - Detail cleaning of work area; and
 - Clearance air monitoring shall be performed at the completion of all work within each negative pressure work area.
- INSTALLATION OF EXTERIOR HOIST(S) AND TOWER CRANE GENERAL SEQUENCE:
- Prior to initiating exterior work the abatement subcontractor shall ensure that there is a scaffold bridge on the sidewalk below the installation point.
 - Exterior building façade surfaces directly impacted by the installation will be cleaned in conformance with the following façade cleaning protocol:
 - Access to the area below the façade cleaning shall be restricted and marked with caution tape. Cleaning shall not be performed during wind speeds greater than 20 mph. The area below the façade cleaning shall be covered with a layer of polyethylene sheeting.
 - Directly upon removal from the surface, all debris shall be placed in an appropriate waste bag for proper disposal as asbestos waste.
 - All impacted horizontal and vertical surfaces that are required to be removed to install the hoist(s) and/or tower crane shall be cleaned of large bulk material by wetting and hand brushing, scraping with non-metallic bristle brushes or non-metallic scrapers, by wet-wiping and /or HEPA vacuuming from the top to bottom. Only water shall be used for wet wiping. Removed materials shall be placed in appropriate waste bag for proper disposal as asbestos waste.
 - Windows and panels shall be wet-wiped. Free running water shall not be evident during this procedure. Power for HEPA vacuums shall be supplied through ground fault interrupters.

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- At the completion of the work, a visual inspection of the abated surfaces, sidewalk and scaffold bridge shall be performed to verify the absence of visible debris.
 - Column covers and aluminum fascia at various locations on floors where necessary connections for this equipment must be made may be breached in the process of this installation and therefore care will be taken in the removal of the aluminum sheetmetal covering.
 - The abatement subcontractor shall identify the joints located on these column covers and inspect for the presence of asbestos containing caulking material. If caulking is present, the abatement subcontractor shall utilize a non-abrading cutting tool to cut the required portion of the sheetmetal covering while wetting the material with amended water. Any dust generated in this process shall be immediately HEPA vacuumed. The removed sheetmetal covering shall be placed in an appropriate waste bag for proper disposal as asbestos waste.
 - Interior attachment points: the abatement subcontractor shall establish an enclosure using one layer of 6-mil poly and appropriate support structures surrounding the interior attachment points.
 - The enclosure shall be attached and sealed to the exterior wall inside the Building at the location where windows will be removed and/or other openings to the exterior environment must be created.
 - Once the enclosure is established, the abatement subcontractor shall clean all dust and surfaces within the area via HEPA vacuuming and wet wiping.
 - The Project Monitor shall then perform a visual inspection and clearance air sampling within the attachment point enclosure prior to allowing the opening to the exterior to be established.
 - Once the opening to the exterior has been established and the necessary connections are made for the erection of the hoist and tower crane, the abatement subcontractor shall temporarily seal the exterior opening with a rigid barrier covered with 6-mil poly with appropriate supports to ensure the barrier will remain in place until completion of Phase I activities on that floor.
- **INSTALLATION OF INTERIOR CONCRETE CHUTE TO BE USED TO TRANSPORT CONCRETE SLAB DEBRIS GENERATED DURING CLEAN PHASE II ACTIVITIES ONLY**
- For the purpose of transporting clean concrete floor slab debris that is generated during the clean Phase II structural deconstruction activities only, steel debris chutes shall be installed from the top down at four (4) locations which do not breach the raceway and walker duct system. These debris chutes shall be used for clean concrete only and shall not be used to transport asbestos.
 - Every effort will be made to locate the 4 shaft locations to avoid interference as it transverses the mechanical floor (5th floor). However, the possibility exists that some out of sequence work must occur to relocate equipment.
 - Chute dimensions shall be approximately 36 inches in diameter.

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- On floors where Phase I work has not yet been completed, work shall be performed in a controlled manner by a licensed asbestos abatement subcontractor utilizing licensed personnel and sequenced as follows:
 - o Tent enclosures, with a nominal dimension of 8' x 8', shall be constructed with one layer of fire retardant 6-mil poly to contain the areas where the chute is to be installed. The tent enclosures shall extend from the top of the floor slab to the underside of the concrete ceiling slab above. The tent enclosures shall be placed under negative air and the abatement work shall be performed out of sequence.
 - o The area immediately below the proposed penetration location shall be prepared in a similar manner
 - o Localized removal of ACBM, WTC dust and obstructions potentially interfering with chute installation (such as ducts, conduits and black iron) existing within the tent enclosures shall be performed. Debris generated shall be bagged and handled as asbestos-contaminated waste. Non-porous materials may be removed from the tent enclosure and staged for cleaning and salvage during subsequent Phase I abatement activities.
 - o Chute sections will be capped at both ends before bringing them into the work area.
 - o Jackhammers will be used to create concrete slab openings of sufficient size to accommodate the installation of the chute. Concrete rubble will be picked up and then the Q deck will be removed.
 - o Chute sections shall be incrementally installed, fitting conically shaped fore sections into larger aft sections of each chute.
 - o Chute sections shall be secured to the Building's structure adhering to requirements approved by a New York State Licensed Professional Engineer.
 - o Floor penetrations around the chute shall be sealed using spray foam, 6-mil poly and tape or similar means.
 - o Where chute sections have been joined, seams shall be sealed with duct tape to ensure the chute remains airtight.
 - o The exterior surface of the chute shall be fully plasticized, from slab to slab, with two layers of fire retardant 6-mil poly; as a means of further segregating it from any ongoing Phase I work activities.
 - o Clearance air samples shall be required, within the individual tent enclosure, only when Phase I abatement activities and satisfactory clearance air monitoring results have been achieved on the floor above. If Phase I abatement activities have not been completed on the floor immediately above and below the tent enclosure, clearance air monitoring shall not be required within the individual tent enclosure prior to disassembly. Clearance air monitoring for the tent enclosure area shall be performed at the completion of Phase I abatement activities within the applicable negative pressure work area.
 - o The Phase I abatement subcontractor shall perform daily inspections, within the active abatement area, to verify the integrity of the poly covering the chute. Any defects identified will be repaired immediately.

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- The Phase I abatement subcontractor will remove the polyethylene covering the chute as part of its final cleaning work within each work area prior to performance of air clearance sampling.
 - In building areas where Phase I abatement activities have been completed and satisfactory clearance air monitoring results have been achieved, on that floor and the floor directly below, slab penetrations and installation of chute sections shall not require use of a tent enclosure. Disposal of removed concrete and Q deck in these areas shall be as clean material.
- 3. Each floor may be segregated into one or more negative pressure work areas. Multiple floors may be interconnected to form a single work area. Work areas within or between floors may be segregated by constructing an isolation barrier consisting of two layers of at least 6-mil poly within existing structural openings (e.g., doorways, corridors).
- 4. All openings and penetrations to the exterior of the work area shall be sealed in accordance with ICR 56-8.1(j). Small penetrations around piping, conduit, etc., may be sealed with expandable foam. Floor drains shall be covered with two layers of 6-mil poly.
- 5. Prior to the start of abatement activities, the contained work area shall be inspected to ensure that it is free of any penetrations to outside the work area and is a closed system. Should any penetrations be found, they shall be properly sealed. Smoke testing of barriers and enclosure systems will be performed in conformance with ICR 56-11.1(e).
- 6. If during the removal operations a penetration is found, work shall stop immediately and the penetration shall be properly sealed.
- 7. Materials containing asbestos shall be wetted frequently with amended water. No dry removal or disturbance of asbestos shall be permitted.
- 8. Floor tile and mastic will be removed via the following work practices:
 - Floor tiles and mastic shall be periodically misted with amended water prior to, during and subsequent to removal
 - Floor tiles will be removed using manual methods only, to the extent practical.
 - Floor tiles shall be directly containerized for disposal.
 - Chemical mastic remover using manual methods and or a mechanical buffer may be used to remove gross residual mastic from areas.
 - Concrete staining or discoloration caused by absorption of liquefied petroleum based mastics will be visually inspected to verify that all residual mastic has been removed from the concrete substrate. Upon verification that residual mastic has been removed, concrete staining or discoloration may remain.
- 9. ACBM pipe insulation shall be removed within an existing negative pressure work area and will be removed either using glovebags or a "wrap & cut" procedure. The abated area of the pipe to be cut need not be plasticized. Pipe sections to be removed with the ACBM insulation intact shall be wrapped with two layers of 6-mil poly and sealed with tape. A label shall be

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placed on each length of pipe. Pipe shall be adequately supported prior to cutting and shall be cut only on abated or clean surfaces.

10. Sprayed-on Fireproofing ("SOFP") shall be removed within an existing negative pressure containment as follows:
 - The floor within the active SOFP removal area shall be covered utilizing a single layer 6-mil poly drop cloth extending beyond the active SOFP removal area by at least ten feet in every direction;
 - Bulk removal of SOFP may be performed using a pressure wash system. If a pressure wash system is used, waste water will be collected, filtered through a system with at least 5.0 micron particle size capability prior to discharge in accordance with all applicable regulations.

11. Walker Duct and raceways will be cleaned as follows:
 - Remove all wires and cables from ducts and raceways.
 - Marker holes shall be drilled in the raceways at the junction points of the walker ducts and raceways, as required.
 - Openings will be made in the raceways at the location of the marker holes. The openings should be of sufficient size to permit passage of water and debris from the walker duct cleaning.
 - Interior surfaces of the walker ducts shall be thoroughly rinsed using water.
 - Additional openings shall be made in the underside of the raceways, as required, to permit access to interior surfaces for cleaning.
 - Local negative ventilation shall be utilized in the section of the raceway actively being cleaned.
 - The interior surfaces of the raceways should be cleaned using a combination of manual and mechanical means.
 - All methods used shall incorporate the use of vacuum collection devices that are operated continuously during cleaning. A vacuum device shall be connected to the downstream end of the section being cleaned through a predetermined opening. The vacuum collection device must be of sufficient power to render all areas being cleaned under negative pressure.
 - All vacuum devices shall be equipped with HEPA filters (minimum efficiency), including hand-held vacuums and wet-vacuums.
 - All methods require mechanical agitation devices to dislodge debris adhered to interior duct/raceway system surfaces, such that debris may be safely conveyed to vacuum collection devices.

12. Large non-porous unventilated equipment that cannot be moved manually may be cleaned in place and left uncovered during clearance air monitoring. This equipment will be removed as clean material after the completion of the abatement phase of this project.

13. Large non-porous ventilated equipment that cannot be internally cleaned or moved manually may be (i) packaged in a double lined hardwall container, properly labeled as asbestos

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contaminated waste, and staged for removal by mechanical means after the completion of the abatement phase; or (ii) torch cut, as needed, to reduce the size of these components for handling and/or complete decontamination.

14. Porous demolition debris and porous material within the work area shall be disposed of as asbestos-contaminated waste.
15. Non-porous salvage items may be decontaminated and released as specified in Industrial Code Rule 56-8.2.
16. Torch cutting and welding shall be performed in accordance with the contractor's standard cutting and welding safety procedures and in accordance with applicable federal, state and local laws, including but not limited to the following requirements:
 - All cutting and welding will be performed under a Hot Work (Welding/Cutting) Permit Program;
 - All work will be performed by personnel who possess the appropriate New York City Fire Department Flammable Gas Torching/Welding Certificate of Fitness;
 - All work will be performed under firewatch supervision by personnel who possess the New York City Fire Department Flammable Gas Torching/Welding Fire Guard Certificate of Fitness;
 - Protection from fire hazards with guarding will be required to confine heat, sparks and slag generated by operation;
 - Prior to cutting/welding, inspections will be conducted by experienced and certified personnel authorized to issue Hot Work Permit; and
 - Additional special precautions will be taken when combustible materials are located within 35 feet of the point of operation or wall or floor openings that are within a 35 foot radius of operation.
17. Diesel-powered heavy equipment (e.g., bobcat, forklift) may be utilized to move and remove debris, perform some interior demolition and place debris in containers, provided the contractor can take reasonable and appropriate measures to demonstrate that safety issues such as potentially harmful emissions can be adequately controlled in accordance with applicable federal, state and local occupational requirements. Prior to removal from the work area, heavy equipment used on the project shall be cleaned as follows:
 - An equipment decontamination area shall be cordoned off within the work site for cleaning heavy equipment, e.g. backhoes, excavators, loaders. The floor surface in this decontamination area shall be plasticized and banked on the side to confine the contaminated wastewater.
 - Equipment shall be washed with water after which all exposed surfaces of the equipment shall be manually wet wiped. Upon completion of the decontamination procedures, the interior of the equipment decontamination area shall be wet wiped.

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- The floor surface below the equipment decontamination area shall be cleaned and any residual asbestos contamination shall be removed and disposed of as asbestos-contaminated waste.
 - Wastewater shall be confined within the equipment wash area and shall be collected and filtered through a system with at least 5.0 micron particle size capability prior to discharge.
18. Upon completion of all work within each floor of the negative pressure work area the following work practices will apply:
- The entire work area shall be thoroughly washed (a pressure wash system may be used) using amended water and HEPA vacuumed dry.
 - All standing water shall be collected by HEPA vacuuming or mopping the area. All standing water shall be removed.
 - Wall/Floor poly, as applicable, shall be encapsulated and removed. All standing water shall be removed.
19. Following a minimum drying time of four hours after wet cleaning has been completed, an authorized and qualified individual; independent of the removal project, such as the Project Monitor or Design Engineer, shall determine if the surfaces in the work area are dry and free of dust and debris. The exception to this would be the raceways and walker ducts, which cannot be visually inspected. Once the accessible work area has been inspected and found to be clean and dry, aggressive clearances may be performed.

56-9.1(a) – Large Project Decontamination Enclosure System

An exemption is requested from portions of this section as the areas where removal of ACBM and asbestos-contaminated materials will occur are not contiguous.

We are proposing that:

1. A large project personal decontamination enclosure system, which may be remote from the work area but otherwise complies with the provisions of ICR 56-9, shall be utilized. The large project personal decontamination enclosure system shall be fully framed and sheathed.
2. Personnel shall don two layers of protective clothing prior to entering the work area.
3. Provided that workers are moving from a contaminated work space to another contaminated work space or from a contaminated work space through the yet uncleaned remainder of the Building (which NYSDOL and other regulatory agencies have stated is contaminated with asbestos), they need not return to the decon or remove/change their protective clothing.

**56-10.1(a)(1) – Waste Decontamination Enclosure System; and
56-12.1(c) through (e) – Handling and Removal Procedures**

Exemption from portions of these sections is requested based on the following:

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- a. It is anticipated that a high volume of asbestos waste, including ACBM, WTC dust and asbestos-contaminated waste, will be generated during this project. Therefore, conventional bagging of all asbestos waste on a project of this size would result in generation of very large waste volumes for handling and packaging, an increase in the number and/or size of trucks required for waste transportation, an increase of off-site burial volume, and require workers to hand process waste in a time- and labor-intensive manner. This exemption is being requested to reduce the volume of asbestos waste trucked through Lower Manhattan, reduce the volume of waste to be placed in landfills, and minimize workers' direct handling and packaging of asbestos-contaminated waste.
- b. The project may be performed using a portable bulk shredder for processing of the asbestos-contaminated waste in order to facilitate its transport to a waste packaging station.
- c. The removal of large sheet metal sections and steel components will require use of heavy equipment to move and lower them to grade level.
- d. The majority of the large sheet metal and steel components will be washed and decontaminated for release as clean salvage. Porous materials will be properly packaged for disposal as asbestos waste and lowered to the ground using controlled methods (e.g., hoists).

Based on the above, it is proposed that:

1. No dry removal or disturbance of asbestos shall be permitted.
2. Asbestos shall be wetted frequently with amended water. Sufficient time shall be allowed for penetration to occur prior to abatement activities. All friable asbestos shall be saturated. All non-hygroscopic asbestos shall be wetted on a continuous basis.
3. If a portable bulk shredder is utilized, it shall remain within the active negative pressure work area during use. Asbestos-contaminated waste material within the portable bulk shredder shall be wetted during system operation.
4. Asbestos contaminated tools/equipment shall be decontaminated by utilizing the personal or waste decontamination enclosure system.
5. A waste decontamination enclosure system ("waste decon") may be constructed within the negative pressure work area at the exit from the contained area. The waste processing area shall be fully framed and the interior floor, wall and ceiling surfaces shall be lined with two layers of 6-mil reinforced fire-retardant poly.
6. The interior and exterior entrance to the waste processing area shall be of sufficient size to accommodate large metal components, to permit safe entry and exit of heavy equipment and contain "flaps" or a curtain drape to assist in maintaining negative pressure within the waste processing area.
7. All removed ACBM must be packaged at the time of removal and will not remain in the work area, unpackaged at the end of the work day. All other removed asbestos waste not packaged

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for disposal during the shift, shall be thoroughly wetted and covered with poly during non-work periods. Poly used to cover asbestos waste piles shall be disposed of as asbestos waste.

8. The floor surface in the waste process area shall be banked on the side to confine the contaminated waste water. Waste water shall be drained, collected and filtered through a system with at least 5 micron particle size collection capability. A system containing a series of several filters with progressively smaller pore sizes shall be used to avoid rapid clogging of the filtration system by large particles. Filtered wastewater shall be discharged in conformance with applicable codes. Contaminated filters shall be disposed of as asbestos waste.
9. Non-porous materials may be decontaminated utilizing wet methods (a pressure wash system may be used). Removal of non-porous, movable salvage shall be performed in compliance with 56-8.2(a).
10. Any loaded Gaylord type boxes will be placed on pallets and passed through the waste decon via a pallet jack where they will be wet wiped and HEPA vacuumed.
11. Upon completion of the decontamination procedure, the interior of the waste process area shall be wet cleaned. All standing water shall be collected by HEPA vacuuming or mopping the area. All standing water shall be removed.

56-12.1(d) - Chutes

Relief is requested from the maximum vertical distance of 10 feet for the removal of asbestos contaminated materials based on the following:

- a. Typical ceiling heights in the finished interior spaces exceed a height of 10 feet. The maximum ceiling height in the finished interior space is 21 feet.
- b. The typical ceiling height in the finished interior space, from Floors 6-36, is approximately 12 feet.
- c. Ceiling heights in the Mechanical Rooms located on Floors 5, 38 & 39 are 28 feet, 17 feet and 15 feet, respectively.
- d. Ceiling height in the first floor atrium area is approximately 21 feet.
- e. Ceiling in the cellar B, Cellar A and Floors 2-5 range from approximately 16 feet to 18 feet.

We propose to do the following:

1. Asbestos contaminated materials shall be thoroughly wetted prior to disturbance. Upon removal from the substrate, contaminated materials will be wetted and properly packaged for disposal. Packaging of waste shall be performed concurrent with on-going removal activity. Accumulations of unpackaged waste shall be minimized. All removed materials shall be properly packaged by the end of the work day for disposal as asbestos waste.

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56-17.1 – Background Air Samples

Relief is requested from the requirement to perform Background Air Sampling (prior to start of project) based on the following:

- a. Static area air sampling has been performed on an on-going basis at the site since 2001.

56-17.2 - Post Abatement Air Monitoring

The asbestos abatement portion of the project shall be considered complete within each work area when the area is visually clean of all dust (with the exception of walker ducts and raceways which, as noted, can not be visually inspected) and the results of aggressive interior air clearance sampling are below the asbestos clearance criteria of 70 structures/mm² (collected and analyzed in accordance with AHERA TEM protocols). Where areas fail the visual inspection or any asbestos clearance air sample is found to be above 70 structures/mm², the work area must be re-cleaned and re-tested until successful air clearance is achieved. Final air samples will be collected following “aggressive” air sampling techniques, as per ICR 56 17.2 (f). A minimum of five (5) air samples shall be collected and analyzed per work area. A minimum of five (5) asbestos air samples per floor will be collected. The asbestos abatement clearance air sampling criteria will be deemed to have been met in a work area when all samples, collected and analyzed in accordance with AHERA TEM protocols, are less than 70 structures/mm².

In addition to the asbestos abatement clearance air sampling, a minimum of five (5) air samples shall be collected per work area following “aggressive” air sampling techniques and analyzed for all of the contaminants listed below. The sampling may be performed concurrent with or subsequent to asbestos abatement clearance air monitoring. Although the asbestos abatement cleanup portion of the project under ICR 56 will be deemed complete following receipt of successful TEM clearance air sample results, containments will remain and the area will be sampled and re-cleaned, as and if necessary, to achieve the following supplemental air clearance levels:

<u>Metals (NIOSH protocols)</u>	<u>Clearance Level</u>
Antimony	250 ug/m ³
Barium	250 ug/m ³
Beryllium	1.0 ug/m ³
Cadmium	5.0 ug/m ³
Chromium (III)	250 ug/m ³
Copper	500 ug/m ³
Lead	25 ug/m ³
Manganese	100 ug/m ³
Mercury	12.5 ug/m ³
Nickel	50 ug/m ³
Zinc	1,000 ug/m ³

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56-17.3 – Air Sampling During Abatement

Relief is requested from the requirements for daily air monitoring during non-work periods. We propose the following:

1. Daily air monitoring shall be performed each working day. Daily air monitoring shall be conducted during any period of asbestos disturbance (including pre-cleaning, set up, abatement/cleaning, final cleaning and waste removal).
2. On days when the above activities are not performed, daily air monitoring will not be conducted. If work is temporarily suspended for this project, daily air monitoring will not be required under this Site Specific Variance.
3. Independent of this request for variance, during deconstruction, air monitoring conducted by LMDC's consultant outside of the Building will continue on a daily basis, 24-hours per day, regardless of whether work is or is not occurring in the Building. The nature and scope of this monitoring will be set forth in the revised Deconstruction Plan.

56-17.3(4) – Air Monitoring on Negative Filtration Unit Exhaust

Exemption from portions of this section is requested based on the following:

- a. Each floor in the work area is approximately 35,000 SF with a nominal ceiling height of 13 feet. More than 20 operating HEPA negative ventilation units will be required to maintain the required air change rates on each floor.
- b. The subject facility is a 40 floor high-rise office building in Manhattan. Exterior windows are fixed pane with no existing exterior access for sampling.

We propose the following:

1. Negative ventilation unit exhausts shall be placed into groups of not to exceed six units.
2. An access port will be cut into the rigid barrier to provide access for placement of an exterior sample. The access port shall remain sealed during sampling and when not in use.
3. One area sample shall be taken within ten feet of each unobstructed negative pressure ventilation equipment "group" exhaust.
4. In the event that results of exhaust samples exceed 0.01 f/cc or background, whichever is greater, negative pressure ventilation exhausts within the affected "group(s)" shall be separated and sampled individually. Negative pressure ventilation exhausts within the affected "group(s)" shall remain separated until either a defective unit is identified or sample

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results for three consecutive days of sampling are less than 0.01 f/cc or background, whichever is greater.

Independent of this request for variance, air monitoring conducted during deconstruction by LMDC's consultant outside of the Building, both at ground level and at elevation, will take place on a daily basis, 24 hours per day. The nature and scope of this monitoring will be set forth in the revised Deconstruction Plan.

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ATTACHMENT #1

**TABLE 1
SUMMARY OF INSPECTION RESULTS
FOR CONFIRMED ASBESTOS-CONTAINING MATERIALS**

CONFIRMED ACM	APPROXIMATE QUANTITY		CONDITION and FRIABILITY	NOTES / LOCATION
	SF	LF		
Floor Materials (Linoleum, 9"x 9" and 12" x 12" Floor Tile) and Associated Mastic including Baseboard Mastic	138,940		Damaged, Non-friable	Approximately 138,940 SF of asbestos-containing "Floor Tiles & Associated Mastic Including baseboard Mastic" were identified in the following locations: 28 th up to 39 th Floor; 22 nd up to 26 th Floor; and Basement B up to the 20 th Floor.
Sealant at Cable Entrances	50		Damaged, Non-friable	Located in Basement A.
Pipe Insulation, Greater than 8"		600	Damaged, Friable	Located in Basement A pipe shaft up to the 40 th floor
Pipe Insulation, Greater than 6"		550	Damaged, Friable	Located on the 20 th Floor
30" Pipe Insulation	400		Damaged, Friable	Located in Basement A above ceiling tiles.
Transite Board	110,200		Good, Non-friable	Located on the Roof Cooling Tower, 40/41 st and 5 th / 6 th Floor MERs, Basement B.
Pipe Insulation, Greater Than 12"		1,200	Damaged, Friable	Located on the 5 th and 6 th Floor MER.
Gash: Wall/Floor Joint Tar Paper	2,250		Good, Non-friable	Located in the North Side Gash area: 7 th Floor up to the 12 th Floor; 15 th Floor up to the 17 th Floor.
HVAC Duct Caulking Material (Joint)		1510	Good, Non Friable	Located on the 23 rd Floor and 40/41 st Floor MER.
Black Fan Room Wall Insulation	11,600		Damaged, Non- Friable	40 th & 41 st Floor MER.
Caulking at Fans		50	Minor Damage, Non-friable	Located on the Roof.
Window Caulking		40	Minor Damage, Non-friable	
Gray Caulking/sealant on column and beam aluminum covers	145,000		Minor Damage, Non-friable	Located on the Exterior Façade. (Estimated quantity for 38 Floors and excludes material quantity from Gash area).
Brown/Red Sealant on High Pressure Supply Duct System and	30,000		Good, Non-Friable	Located inside each radiator unit from 7 th Floor up to 34 th Floor; Supply Duct System located in the plenum area from 7 th Floor up to 34 th Floor; and four 36" diameter

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TABLE 1 SUMMARY OF INSPECTION RESULTS FOR CONFIRMED ASBESTOS-CONTAINING MATERIALS				
CONFIRMED ACM	APPROXIMATE QUANTITY		CONDITION and FRIABILITY	NOTES / LOCATION
	SF	LF		
Convactor Units,				supply duct system from the 5 th Floor up to the 40 th Floor (from two Pipe/HVAC shafts).
WTC Dust/Residue Contamination	1,900,000		Damaged, Friable	Located on all surfaces within Building and on exterior of building.
Note:				
1. All quantities are approximate.				

TABLE 2 SUMMARY OF INSPECTION RESULTS FOR ASBESTOS BY FLOOR				
FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
ROOF				
	Exhaust Fans & West Side/ BC-45	Caulking at Fans		50
	Tank Bulkhead Window/ED-45	Window Caulking		40
40TH AND 41ST FLOORS MECHANICAL ROOM				
	Mechanical Room/CD-56	12" x 12" Floor Tile (Black) and Associated Mastic on Floor Tiles	3,700	
	Elevator Machine Room/CD-34			
	Equipment Room/CD-45			
	North/Area of the Exposed Steel Deck/GF-56	12" x 12" Floor Tile (Grey) and Associated Mastic on Floor Tiles	1,000	
	East/Area of the Exposed Steel Deck/GF-56			
	Room Next to Louvers/EF-34			
	Cooling Tower Transite/CD-23	Transite Wall/slats	20,000	
	Mechanical Room Perimeter Wall	Transite Wall	37,000	
	HVAC Units at North Side of Bldg./BC-78	Fan Room Walls Insulation (Black)	11,600	
	Mechanical Space/BC-56	HVAC Duct Joint Caulking		10

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TABLE 2 SUMMARY OF INSPECTION RESULTS FOR ASBESTOS BY FLOOR				
FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
39TH FLOOR				
	South Corridor/East/ED-34	12" x 12" Floor Tiles 2 Layers (Pink and Tan) and Associated Mastic on Floor Tiles	400	
	South Corridor/Middle/ED-34			
	Vending Machine Room/CB-34			
	North Corridor/West/CD-67	12" x 12" Floor Tiles (Grey) and Associated Mastic on Floor Tiles	2,300	
	South Corridor/East/CD-67			
	South Corridor/Middle/CD-34			
38TH FLOOR				
	South Corridor/BC-34	12" x 12" Floor Tiles (Grey) and Associated Mastic on Floor Tiles	3,000	
	North Corridor/DC-34			
	South Corridor/Middle/DC-67			
	Room by S.Corridor/W.Side/BC-34	12" x 12" Floor Tiles Composite 3 Layers (Blue) and Mastic	120	
	Room by S.Corridor/W.Side/BC-34			
37TH FLOOR				
	North Corridor/DC-67	12" x 12" Floor Tiles (Brown/Beige/Blue) and Mastic	2,550	
	North Corridor Storage Room/ED-56			
	North Corridor Storage Room/DC-56			
	Elevator Hallway/CD-45			
	South Corridor/DC-34			
	Storage Room North/CB-56			
36TH FLOOR				
	Small Storage at W.Side/BC-45	12" x 12" Floor Tiles (Black) and Mastic	170	
	Elevator Base			
35TH FLOOR				
	Storage Room North/ED-56	12" x 12" Floor Tiles 2 Layers (Beige)	800	
	North Corridor/DC-67			
34TH FLOOR				
	Small Office at E.Side/ED-23	12" x 12" Grey Floor Tiles [2-layer composite] Mastic associated with 12" x 12" Grey Floor Tiles	1,500	
	Room in the Middle/ED-34			
	Room in the Middle/ED-45			
	North Corridor Storage Room/ED-56			
	North Corridor Storage Room/DC-56			
	Office in The Middle/ ED-34			

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	North Hallway E.Side/ CB-78			
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	Office W.Side/ AB-56	12" x 12" Black Floor Tiles [1 layer]	3,500	
33RD FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	Small Office S.Side/ GF-12	12" x 12" Floor Tiles (Tan) Associated Mastic with 12" x 12" composite Floor Tiles	1,500	
	Small Office S.Side/ GF-23			
	Large Office S/E Side/ FE-23			
	East Hallway Small Office/ ED-23			
	S. Corridor Frate Elevator/ DC-34			
	N/E Small Storage Room/ GF-78			
	N.Side Small Office/ ED-78			
	W.Side Small Storage Room/ CB-34			
	W.Side Small Storage Room/ AB-34			
	S/W Small Storage Room/ CB-23			
	East Hallway Electrical Room/ ED-34	12" x 12" Black Floor Tiles Associated Mastic	1,000	
	Electrical Room/ N. Middle/ ED-56			
	Large Office/ N.Side/ ED-56			
	S.Hallway Electrical Room/ ED-34			
	W.Side A/V Room/ AB-34			
	Room Adj To Freight Elevator/ ED-23			
	N.Corridor Small Storage Room/ DC-56	12" x 12" Floor Tiles (Grey)	200	
32ND FLOOR				

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			SF	LF
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	S/E. Small Room/ FE-34	12" x 12" Black/Beige Floor Tiles Mastic Associated with 12" X 12" Floor Tiles	850	
	Conference Room E.Side/ GF-45			
	N/E Small Room/ FE-56			
	Stairwell B / ED-56			
	N.Corridor Small Storage Room/ DC-56			
31ST FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	East Side Small Office/ HG-45	12" x 12" Black and Beige Floor Tiles and Mastic	4,200	
	East Hallway Into Open Area/ HG-45			
	Conference Room E.Side/ GF-45			
	East Side Small Office N./ GF-56			
	East Side Small Office S./ GF-56			
	EP. Room N.Corridor/ FE-56			
	Middle Elevator Room/ ED-45			
	North Corridor Small Storage Room/ ED-56			
	Conveyor Room North/ DC-56			
	West Side Small Office/ CB-34			
	West Side Small Office/ CB-45			
30TH FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	S. Corridor Electrical Panel Room/ DC-34		500	
	S. Small Room By Stairway A/ FE-34	12" x 12" Pink Floor Tiles		
	N. Corridor Small A/C Room/ FE-56	Mastic associated with 12" X 12" Pink Floor Tiles		
	Conveyor Room North/ DC-56			
	Open Area North/East/ GF-67		3,600	
	North Side Small Office/ FE-67			
	North Side Small Office/ FE-67			
	North Side Small Office/ ED-67			
	North Side Small Office/ GF-78			
	North Side Small Office/ GF-78	12" x 12" Black Floor Tiles		
	North Side Small Office/ FE-78	Mastic associated with 12" X 12" Black Floor Tiles		
	North Side Small Office/ FE-78			
	North Side Small Office/ FE-78			
	North Side Small Office/ ED-78			
	North Side Stairwell B / ED-56			
	South Side Telecom Room/ ED-34			
	South Open Area by Stairs/ DC-23			
29TH FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	East Side Room/ GF-34		2,200	
	East Side Room/ GF-45			
	North East Side Small Office/ GF-56			
	North East Side Small Office Storage/ GF-56			
	Kitchen N. Side Room/Middle/ DE-67	12" x 12" Floor Tiles (Grey)		
	N. Side Room/Middle/ ED-78	Associated Mastic on Floor Tiles		
	N. Corridor Storage Room/ DC-56			
	N. Corridor Small Room/ CB-56			

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	S/W Side Small Room/ BC-34			
	S/W Side Small Room/ BC-34			
28TH FLOOR				
	North Side Small Office/ DC-67	12x12" Floor Tiles (Grey)	1,500	
	North Side Small Office/ DC-67			
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	Mechanical Space/AB-34	12" x 12" Floor Tiles (Light Brown)	120	
27TH FLOOR				
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	Entire	Brown Seal inside each convector unit	230	
26TH FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	
	N/E Side Office/GF-67	12" x 12" Floor Tiles (Beige) and Mastic	750	
	Room Adjacent to Men's Room E./DC-56			
	Room Adjacent to Men's Room W./DC-56			
25TH FLOOR				
	Entire	Brown Seal inside each convector unit	230	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	750	

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	South Hall / Open Area / Middle / FE-23	12" x 12" Floor Tiles (Black)	2,000	
	South Hall / Small Office / Middle / FE-34			
	Room Adj. To Men's Room/West/ CD-56			
24TH FLOOR				
	Entire	Brown Seal inside each convector unit	200	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	By Women's B/Room/Middle/ DC-34	12" x 12" Floor Tiles (Grey) and Mastic	120	
23RD FLOOR				
	South Corridor Conveyor hall/ ED-34	12" x 12" Floor Tiles 2nd Layer (Black) and Mastic	500	
	South Corridor Women's Room/ FE-34			
	South Side Corridor/ DC-34			
	Vending Machine Room/DC-34	12" x 12" Floor Tiles (Grey)	900	
	East Hall / Room 2304 / CB-34			
	East Hall / Open Area / AB-34			
	Office 2307 W. Side / AB-56			
	Above ceiling tiles, restricted area	HVAC Duct Caulking (Joint)		1,500
	Entire	Brown Seal inside each convector unit	200	
	Entire	Convector Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	West Open Area / AB-34	Associated Mastic on Baseboard (Brown)	300	
	South Open Area / DC-23			
	East Open Area / GF-34			
22ND FLOOR				

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	Entire	Brown Seal inside each convector unit	200	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Hallway 2254 SE Side / GF-23	12" x 12" Floor Tiles 2 Layers (Grey) and Mastic	400	
	Hallway 2253 / FE-23			
	SW Corner Room / AB-12			
21ST FLOOR				
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
20TH FLOOR				
	Large South Hall West / ED-12	Pipe Insulation at 6"-12" Pipe		500
	Large South Hall Middle / FE-12			
	Large South Hall East / FE-12			
	Vending Machine Room / GF-34	Pipe Joint Insulation at 1" Pipe		50
	South Corridor / DC-34			
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	West Small Office / GF-34	12" x 12" Floor Tiles 2nd Layer (Black)	300	
	Stairwell at South Corridor / GF-23			
19TH FLOOR				
	Storage Adj. to Stair 3/GF-23, closet adj. to vending machine	12" x 12" Floor Tiles 1st Layer (Beige)	350	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	Vending Machine Room, Stair 3, closet adj. to vending machine	12" x 12" Floor Tiles 2nd Layer (Black)	600	
18TH FLOOR				
	Stair 3 Stairwell/ GF-23	12" x 12" Floor Tiles 2nd Layer (Black)	200	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	West Side Small Storage Room/ GF-34	Linoleum Sheeting and Mastic	100	
	South Side Men's Room/ CD-34			
17TH FLOOR				
	SE From Hallway At Stair A/ FE-34 Room At NE Gash/ GH-56	12" x 12" Floor Tiles (Black) and Mastic	300	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
16TH FLOOR				
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	Mens Bathroom Womens Bathroom	Linoleum and Mastic (Brown)	500	
15TH FLOOR				
	Room in Front Of Stair A/ GF-34	12" x 12" Floor Tiles 2nd Layer (Black)	150	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	

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			SF	LF
	Entire	Brown Seal inside each convector unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
14TH FLOOR				
	S. Small Office Adj To Large Hallway /FE-23	12" x 12" Floor Tiles 2 Layers (Beige)	500	
	E. Side Room / Middle / GF-23			
	East Corridor Storage Room / GF-34	12" x 12" Floor Tiles (Black)	1,250	
	East Open Area / GF-45			
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	West Small Office / CB-34	12" x 12" Floor Tiles 2 Layers (Gray)	1,250	
	West Small Kitchen / CB-34			
	S. Room Adj. To Large Hallway/ FE-12			
	Room South To Hallway At Stair A / FE-34			
	S. Room Adj. To Hallway Small Office/ FE-12			
12TH FLOOR				
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
	Mens Bathroom	Linoleum and Mastic (Brown)	500	
	Womens Bathroom			
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	West Corridor Storage Room / FE-34	Associated Mastic on Baseboard (Brown)	50	

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
11TH FLOOR				
	Small Office W. Side/ AB-45	12" x 12" Floor Tiles 2nd Layer (Black) and Mastic	6,000	
	Large Office W. Side/ AB-34			
	West Corridor / AB-34			
	Large Office W. By Open Area / GF-34			
	SE in Fr. Of Corner Room / CB-23			
	SE Small Storage Room/ GF-34			
	West Side Large Office/ GH-34			
	West Side Small Office/ GH-45			
	West Side Small Office/ GH-45			
	West Side Small Office/ GH-45			
	West Side Small Office/ GH-45			
	West Side Small Office/ GH-45			
	Large Office Adj. To Small Office's / GF-45			
	East Corridor / GH-45			
	Large Office Adj. To Small Office's / GF-56			
	W. Corridor / 2nd Room From S. / AB-34			
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
10TH FLOOR				
	Column locations FG-34, FE-23, BC-23, BC-34,	12" x 12" Floor Tiles (Beige)	600	
	Storage by Main Corr. EF-34	12" x 12" Floor Tiles (Black)	200	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convector unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
9TH FLOOR				
	Entire South West Section: Column locations AE-16	12" x 12" Floor Tiles (Beige) and Mastic		
		12" x 12" Floor Tiles 2 Layers (Grey/Composite) and Mastic	9,000	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convactor unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
8TH FLOOR				
	SE Corner: FH-23, GF-34	12x12 Gray/Black VAT and Mastic	350	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convactor unit	200	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
7TH FLOOR				
	SW Section AD-14, Hallway ED-34, ED-34 Small Office, FE-23 Small Offices	12" x 12" Floor Tiles	6,000	
	Gash South Wall Base	Gash: Wall/Floor Joint Tar Paper	250	
	Entire	Convactor Main Supply Air Duct in Plenum Area (24" dia., 16" dia., and 12" dia.)	585	
	Entire	Brown Seal inside each convactor unit	200	
		Associated Mastic on Baseboard (Brown)	500	
5TH AND 6TH FLOORS MECHANICAL ROOM				
	Along Perimeter South, East, North, and West Wall	Transite Board Wall	53,000	
	Upper Level of Maintenance Shop BC-56	Pipe Insulation (white Block), Greater Than 12"		1,200
	Entire North Section AH-68, AB-18, Interior Corridor GC-36	12" x 12" Floor Tiles (Gray, Beige) and Mastic	11,600	

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			SF	LF
4TH FLOOR				
	Small Offices GH-34, DG-13	12x12 Beige and Mastic	300	
3RD FLOOR				
	SE Section and Corridors: CG-16	12" x 12" Floor Tiles and Mastic	4,500	
2ND FLOOR				
	Small Office: GH-56	12x12 Floor Tiles and Mastic	200	
MEZZANINE				
	Corridor: FE-36	12" x 12" Beige Floor Tiles	800	
1ST FLOOR				
	South Section AH-14, Corridors CH-46, and NW section AD-68	12" x 12" Floor Tile [2 Layers]	13,500	
BASEMENT A				
	Mid Section of the Entire Floor AH-37	12" x 12" Floor Tile/3rd Layer (Black)	15,500	
		12" x 12" Floor Tile/3rd Layer (Light Brown)		
		Associated Mastic on Floor Tiles		
		12" x 12" Floor Tile/2nd Layer (Dark Gray) and Mastic		
		12" x 12" Floor Tile (Black)		
	Vault Area (DF-69)	9x9 black and Beige Floor Tile and Associated Mastic	3,500	
	Security Area BE-12	12x12 White Floor Tiles	720	
	Electrical Room	Sealant at Cable Entrances	50	
	Above ceiling tiles	30" Pipe Insulation (White Block Insl.)	400	
BASEMENT B				
	Entire Vault Area: AH-13, and Storage Room FH-56	12x12 Beige (2 layers) and Mastic	9,250	
	Small Room ED-45, Hallway, Vault Area, and Exterior Space Underneath Cellar A Exterior Vault.	12" x 12" Floor Tile (Black) and Mastic	10,690	
	Main Lobby ED-57	Transite Pipe	200	
HVAC/PIPE SHAFTS				

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FLOOR	LOCATION	CONFIRMED ACM	APPROXIMATE QUANTITY	
			SF	LF
	Pipe Shaft (HVAC #1) by Service Elevator: Cellar A up to 40th Floor	>8" Diameter Pipe Insulation (White Block Insulation)		600
	Pipe/HVAC Shaft, from 5 th Floor to 40 th Floor (There are 2 supply duct units in Pipe Shaft #1 and 2 supply duct units in Pipe Shaft #3).	Red Sealant on Seams of 36" Diameter Supply Duct Unit. On each seam, red sealant is approximately 6" to 8" wide.	5,000	
INTERIOR/EXTERIOR SURFACES				
	Located on all surfaces within Building and on exterior of building.	WTC Dust Residue Contamination -	1,900,000	
EXTERIOR				
	Exterior Facade	Caulking/sealant between Spandrel Panel and Column Metal Parts/Covers	145,000	
TOTAL			2,336,407	3,950