

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 5

DATE FORM SUBMITTED: 06/08/07

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

AMENDMENT #5

This Amendment will define the downward movement of scaffold monitors and provide LMDC with the ability to relocate all four (4) scaffolding locations one last time to the 15th floor at elevation and not just any floor or elevation on an as needed basis. This Amendment will comply with the existing provisions of the September 7, 2005 Ambient Air Monitoring Program Plan and will supplant Amendment #4 (03/08/07) which specifies that scaffolding monitoring stations be moved on an as needed basis during the remainder of the abatement and deconstruction program such that these monitors are not placed greater than ten (10) floors below active abatement and not greater than (20) floors below active deconstruction. The current project status is as follows: the interior abatement is complete from the roof to and including the 26th floor work area; the exterior column cover and fascia removal is nearing completion down to the 28th floor; structural deconstruction is occurring on the 36th floor slab. Scaffold monitors that are currently located on the 20th floor shall be moved to the 15th floor scaffold platform.

All four (4) monitoring locations currently in place atop building roofs adjacent to the 130 Liberty Street property and all four (4) ground level stations will remain in place during the balance of the building abatement and deconstruction process. Silica monitors currently situated on the 30th floor shall be moved downward as structural deconstruction progresses. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.

Reason for Amendment:

Amendment #4 (03/08/07) to the September 7, 2005 Ambient Air Monitoring Program Plan specifies that scaffolding monitoring stations be moved on an as needed basis during the remainder of the abatement and deconstruction program such that these monitors are not placed greater than ten (10) floors below active abatement and not greater than (20) floors below active deconstruction. The abatement and deconstruction activities at 130 Liberty Street are a very dynamic process especially when performed simultaneously. As a result, monitoring at fixed elevations in accordance with these floor separation requirements will result in multiple movements of the scaffolding stations during the balance of the program. Multiple relocations of these four (4) scaffolding stations will adversely affect completion of the project in a timely and cost effective manner moving forward. In addition 1-2 days of data will be lost for the majority of the program parameters during each relocation event. Furthermore, data collected at the four (4) scaffolding stations since their installation on November 16, 2005 indicate no exceedances of EPA Site Specific Trigger Levels for any parameter with the sole exception of silica and no exceedances of Target Air Quality Levels with the exception of silica and PM2.5. Silica is currently monitored at scaffolding stations dedicated to this parameter in close proximity to the active structural deconstruction zone and all PM2.5 exceedances of Target Air Quality Levels have historically been associated with regional air quality episodes and/or regional meteorological conditions. Data collected to date at scaffolding stations for all parameters provide ample justification for the final relocation plan for the four

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(4) scaffolding stations addressed with this Amendment.

Additionally, the note to Table 3 of the Ambient Air Monitoring Program Plan Section 6.0 states downward moving of elevated Scaffold Stations will be based on highest reasonable floor in relationship to the work and will be determined in consultation with the EPA.

Sections of Air Monitoring Plan Affected:

Section 2.1, Network Design, On-site Scaffolding Elevated Stations: The reference to the relocation on the scaffolding to any floor or elevation on an as needed basis contained in Amendment #4 to the Air Monitoring Plan will be removed. This will be replaced with the following text: “Scaffolding stations currently situated on the 20th floor will be relocated a final time to the 15th floor. They will remain at this location until such time that the deconstruction reaches the 20th floor at which time these stations will be removed from service. Downward movement of scaffold silica monitors currently in place on the 30th floor will progress along with the deconstruction. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

Section 2.3, Locations of Monitoring Stations:

The reference to the relocation on the scaffolding to any floor or elevation on an as needed basis contained in Amendment #4 to the Air Monitoring Plan will be removed. This will be replaced with the following text: “Scaffolding stations currently situated on the 20th floor will be relocated a final time to the 15th floor. They will remain at this location until such time that the deconstruction reaches the 20th floor at which time these stations will be removed from service. Downward movement of scaffold silica monitors currently in place on the 30th floor will progress along with the deconstruction. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

Date Implemented: June 2007