Please find the additional information related to 66 John Street.

Carpeting was cleaned with water extraction methods. Water extraction methods include the use of industrial-quality HEPA-filtered vacuums with power extraction. Water is sprayed on the carpet surface. The carpet fibers are agitated and the water is extracted from the carpeting.

The USEPA testing various cleaning methods after the WTC and found that the use of standard cleaning methods of vacuuming and wet wiping significantly reduced levels of WTC-related contamination with each cleaning event and was successful in reducing concentrations.

Information provided to DEP Asbestos Control Program(ACP) Enforcement Staff indicated the carpets were cleaned several times between September 11, 2003 and April 2003 through the use of carpet shampoos and water extraction. In addition, the staff was informed that the building is on a periodic cleaning program cycle. Specific dates are not available in the ACP files, but should be available from the building owner and/or cleaning contractor. The last set of cleaning began at DEP's request on April 1, 2003 and was completed on April 4, 2003.

The air sampling was performed on April 5, 2003 rather than on April 4, 2003 as had originally been projected. The sample results are attached for your perusal.

Please feel free to call me if you need additional information.

NYC 9/11 Public Portal Document

LAW OFFICES OF
A. PATRICK NUCCIARONE, P.C.
Suite 107, 1540 Highway 138
Wall, New Jersey 07719

Principal Admitted to Practice in
New Jersey, New York, Vermont

Telephone: (732) 280-4800
Facsimile: (732) 280-4801

Faxed to Krish 6/10/03

June 4, 2003

M E M O R A N D U M

To: Gerould J. McCoy, Compliance Officer

cc: Mark D. Hoffer, Esq., General Counsel

From: A. Patrick Nucciarone, Monitor

re: Asbestos abatement at 66 John Street

I refer to your April 3, 2003 memo, which enclosed a memo from Deputy Commissioner Avaltroni regarding asbestos testing and abatement on the 10th Floor at 66 John Street in Manhattan. I would like more information about the actual cleaning methods used and the sampling results. Please furnish the following:

a) the dates of the initial cleaning (the memo refers to the landlord's agreement to "re-clean" on April 1 through 4, 2003 with a "wet extraction method");

b) a description of the actual methods used both on April 1 through 4, 2003 and on the earlier dates; and

c) the results of the April 4, 2003 air sampling by BEC personnel.

I would appreciate the information by June 20, 2003. Thank you.

Bob -
Could you prepare a draft response and send to me by 6/17/03?
Thanks
GJM

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NYC-WTC_000093020

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New York City Department of Environmental Protection
Asbestos Control Program

66 John Street, Manhattan
9th and 10th Floors

Commissioner Ward received information from NYCDEP employees concerned about the results of a carpet sample taken from the 10th floor of 66 John Street. The Commissioner contacted the Bureau of Environmental Compliance (BEC) and the Office of Environmental Health & Safety Compliance (OEHSC). OEHSC then provided the BEC Asbestos Control Program (ACP) with the result of the carpet sonication sample. The sample result was an excerpt of a report which neither ACP, OEHSC nor the Commissioner has received. The sample result indicated a concentration of 393,061 structures/cm^2. Carpet sonication is not a New York State Department of Health approved method for the collection and analysis of asbestos-containing or asbestos-contaminated material. Further, this sampling method has not been adopted as a Federal, State or local standard.

A single direct relationship between asbestos-containing dust and potential human exposure has not been established. Although, a direct relationship between dust levels and exposure has been documented for other contaminants, e.g. lead, this relationship has not been documented for asbestos fibers probably due to the unique aerodynamic aspects of asbestos fibers. Asbestos fibers do not pose a health hazard unless the fibers become airborne and are inhaled.

The ACP had responded to calls from concerned building occupants and reviewed air and bulk sample results received from the building owner. ACP then conducted site visits at the building. These site visits did not disclose the presence of visible debris within the interior of the building. According to the information in the ACP records, 54 air samples were collected within the building on September 14th, 15th, and 16th, 2001. The samples were analyzed by phase contrast microscopy and were each below 0.01f/cc. Ten bulk samples were collected from exterior surfaces during early July 2002. The results indicated the material was not ACM. On November 1, 2002, 9 additional bulk samples were collected from building exterior surfaces. The results indicated the material was not asbestos-containing material.

As a result of complaints, the building owner initiated air sampling on March 7, 2003. The air samples were collected on the 9th, 10th, and 11th floors. The samples were analyzed by phase contrast microscopy (PCM) and transmission electron microscopy (TEM). The samples were below the clearance levels. Specifically, the clearance level for PCM samples is 0.01 f/cc and for TEM samples is 70 s/mm^2. The ACP asked for and reviewed the data from the air samples after it became aware of complaints regarding the above premises.

Although, the results of several previous site visits and the review of submitted results did not indicate a requirement for further action, the Commissioner requested the building owner to re-clean the carpeting. The building owner agreed to the request and initiated cleaning of the carpet using wet extraction procedures. The cleaning began on April 1, 2003 and is expected to be completed by April 4, 2003. BEC will perform air sampling on April 4, 2003. The results will be evaluated using the clearance criteria indicated above.

NYC 9/11 Public Portal Document

The City of New York
Department of Environmental Protection
59-17 Junction Boulevard
Flushing, New York
11373-5108

Christopher O. Ward
Commissioner

Robert C. Avaltroni
Deputy Commissioner

Bureau of Environmental Compliance

Tel (718) 595-4418
Fax (718) 595-4422

To: Gerould J. McCoy
Agency Compliance Officer
Office of Environmental Health and Safety Compliance

From: Robert C. Avaltroni
Deputy Commissioner
Bureau of Environmental Compliance

Date: April 8, 2003

Subject: 66 John Street

This is a follow-up to the April 3, 2003 memorandum and its attachment.

TEM air sampling was performed at 66 John Street, on April 5, 2003. Twenty-two (22) samples were collected from representative locations on the 10th floor and portion of the 9th floor. The sample analysis disclosed all samples were below the AHERA clearance of 70 s/mm^2 and below the detection limit. A copy of the results is attached for your perusal.

Please feel free to contact me if you need any additional information.

NEW YORK CITY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP
www.nyc.gov/dep
(718) DEP-HELP

NYC-WTC_000093022

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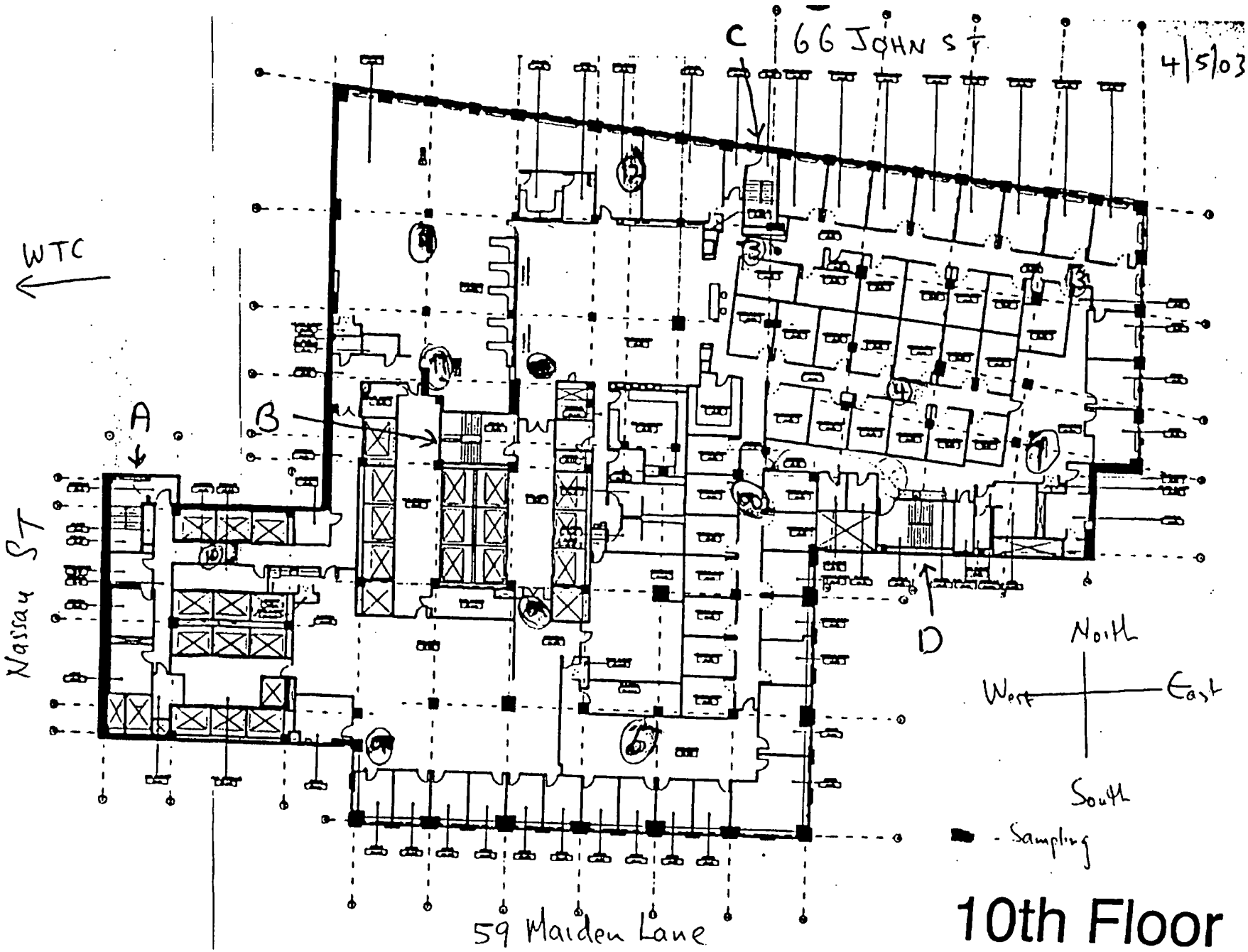

10th Floor

NYC-WTC_000093023

AIR MONITORING DATA SHEET & CHAIN OF CUSTODY FORM

T03-04-006

PROJECT INFORMATION

1. PROJECT NAME: 66 John St Manhattan ECB 1 of 002	2. ADDRESS: 59 Maidenlane / 66 John St.	3. BORO: Manhattan
4. DATE: 4-5-03	5. AIR MONITOR: Ahmad Soloki	6. (a) Background: __ (b) OSHA: __ (c) Pre-Abate __ (d) PostAbate: __ (e) Abatement: __ (f) Ambient: __ (g) PCM (0.8µMCE) __ (h) TEM (0.45µMCE) X

AIR SAMPLING DATA ROTOMETER No:

7. Sample ID	8. Pump No:	9. Sample Location	10. Start Time	End Time	Total Mins	11. Start Flow	End Flow	Avg. Flow	12. Total Vol (L)	MRSTA [illegible]
			SAMPLING TIME			FLOW RATE OF PUMP (L/min)				
302/001	2	WAITING Room entrance [illegible]	11:05 AM	1:35 PM	150	10	10	10	1500	<19.5
302/002	1	WORKING AREA North	11:07 AM	1:37 PM	150	10	10	10	1500	<19.5
302/003	6	WAITING AREA John St SIDE ATC North	11:10 AM	1:40 PM	150	10	10	10	1500	<19.5
302/004	5	IFO hearing Room #27	11:13 AM	1:43 PM	150	10	10	10	1500	<19.5
302/005	4	IFO hearing RM 645	11:15 AM	1:45 PM	150	10	10	10	1500	<19.5

CHAIN OF CUSTODY Turnaround Time: 2hrs __ 6hrs __ 24hrs __ 48hrs __ 72hrs __

14. Relinquished by	15. Received by	16. Date	17. Time	18. Analysis Requested
A. Soloki / [signature]	L. Atteloney / [signature]	4/05/03	2:00 PM	NIOSH 7400: ______ AHERA: X OTHER: ______
L. Atteloney / [signature]	E. Sparks / [signature]	4/5/03	4:00 PM	

New York City Department of Environmental Protection
Bureau of Air, Noise & Hazardous Materials
Division of Emergency Response and Technical Assessment
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APR-07-2003 17:39 BANHM LABORATORY UNIT P.02

NYC 9/11 Public Portal Document

T03-04-006

AIR MONITORING DATA SHEET & CHAIN OF CUSTODY FORM

PROJECT INFORMATION

1. PROJECT NAME: 66 John St 10th Flo[or] 2. ADDRESS: 66 John St 2. BORO: MN

4. DATE: 4/5/03 5. AIR MONITOR: Emmanuel Beatus

6. (a) Background: __ (b) OSHA: __ (c) Pre-Abate: __ (d) PostAbate: __ (e) Abatement: __ (f) Ambient: __ (g) PCM (0.8μMCE) __ (h) TEM (0.45μMCE) X

AIR SAMPLING DATA ROTOMETER No:

7. Sample ID	8. Pump No:	9. Sample Location	10. Start Time (Sampling Time)	End Time	Total Mins	11. Start Flow (Flow Rate of Pump (L/min))	End Flow	Avg. Flow	12. Total Vol (L)	Asb-3?
307/009	9	South West Corner Maiden Ln & Nassau St	11.12	01:48	156	10	10	10	1560	419.5
307/010	10	Pantry Area	11:15	01:51	156	10	10	10	1560	419.5
307/011	11	Corridor between Electrical Closet & File Storage IDC	11:18	01:53	155	10	10	10	1550	419.5
307/012	12	John St Side by cubicle 32-10th	11:22	01:55	153	10	10.0	10	1530	419.5
307/013	13	Area of Room 22 & 23, corner John St & William St	11:25	01:57	152	10	10	10	1520	419.5

CHAIN OF CUSTODY Turnaround Time: 2hrs __ 8hrs __ 24hrs __ 48hrs __ 72hrs __

14. Relinquished by	15. Received by	16. Date	17. Time	18. Analysis Requested
E. Beatus / E.B.	L. Attzloney / A. Attalony	04/05/03	2:01 PM	NIOSH 7400: __ AHERA: X OTHER: __
L. Attzloney / A. Attalony	E. Slowski	4/5/03	4:00 PM	

New York City Department of Environmental Protection
Bureau of Air, Noise & Hazardous Materials
Division of Emergency Response and Technical Assessment
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Corona, New York 11368

NYC-WTC_000093025

ATHENICA
ENVIRONMENTAL SERVICES INC.
Tel (718) 784-7490
Fax (718) 784-4085

AIRBORNE ASBESTOS ANALYSIS BY TRANSMISSION ELECTRON MICROSCOPY

CLIENT: NYC DEP
LABORATORY ID #: T03-04-006
ANALYT. METHODOLOGY: AHERA
FILTER TYPE: M.C.E.
AVERAGE G.O. AREA (mm^2): 0.012820

PROJECT: 66 John Street
DATE OF REPORT: 04/07/03
DATE OF ANALYSIS: 04/05/03
EFFECTIVE FILTER AREA (mm^2): 385

LABORATORY RESULTS

CLIENT #	LAB. ID #	LOCATION	VOLUME (l)	G.O.'s ANALYZED	AREA ANALYZED (cm^2)	ANALYT. SENSITIV. (struct./cm^2)	TOTAL ASBESTOS AIR CONC. (struct./cm^3)	TOTAL ASBESTOS FILTER CONC. (str./mm^2)	AIR CONC. FOR STRUCT. 0.5≤S<5μm	AIR CONC. FOR STRUCT. S≥5.0μm	ASBEST. TYPE CHRYS.	AMPHIB. ASBEST TYPE SPECIFY
302/003	T03-04-006-643	Waiting area John St. side exit north	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
302/004	T03-04-006-644	IFO hearing room #27	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
302/005	T03-04-006-645	IFO hearing room #45	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
307/009	T03-04-006-646	South west corner Maiden Lane & Nassau St.	1560	4	0.0513	0.0048	<0.0048	<19.50	NA	NA	NA	NA
307/010	T03-04-006-647	Pantry Area	1560	4	0.0513	0.0048	<0.0048	<19.50	NA	NA	NA	NA

ANALYST
E. Sioukri

LABORATORY DIRECTOR
Spiro Dongaris

LABORATORY CERTIFICATION NUMBERS: NVLAP 101958, ELAP 10955

- Athenica Environmental Services Inc. (AES), is responsible only for information pertaining to samples taken by its employees.
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- If AES Inc., did not conduct the sampling, the reported airborne concentration was derived based on information provided by the client. Under these circumstances, the air concentration data is supplied solely for the convenience of the client.
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AIR MONITORING DATA SHEET & CHAIN OF CUSTODY FORM

AKA T03-04-007

PROJECT INFORMATION

1. PROJECT NAME: Manhattan ECB 9 Fl.	2. ADDRESS: 59 Maiden Lane at John St 9 Fl.		3. BORO: Man
4. DATE: 4-5-03	5. AIR MONITOR: Ahmad Solaki	6. (a) Background: __ (b) OSHA: __ (c) Pre-Abate: __ (d) PostAbate: __ (e) Abatement: __ (f) Ambient: __ (g) PCM (0.8µMCE) __ (h) TEM (0.45µMCE) __	

AIR SAMPLING DATA — ROTOMETER No: — SAMPLING TIME — FLOW RATE OF PUMP (L/min)

7. Sample ID	8. Pump No.	9. Sample Location	10. Start Time	End Time	Total Mins	11. Start Flow	End Flow	Avg. Flow	12. Total Vol (L)	Air Str. CC	Air Str.
302/614	6	North side / John st. side - Nassau	2:30 PM	5:00	150	10	10	10	1500	[illegible]	[illegible]
302/615	2	North side / John st. side	2:35 PM	5:05	150	10	10	10	1500	[illegible]	[illegible]
302/616	1	North side / John st. side - William	2:37 PM	5:07	150	10	10	10	1500	[illegible]	[illegible]
		Blank									
		Blank									

CHAIN OF CUSTODY — Turnaround Time: 2hrs __ 6hrs __ 24hrs __ 48hrs __ 72hrs __

14. Relinquished by	15. Received by	16. Date	17. Time	18. Analysis Requested
A. Solaki				NIOSH 7400:
[signature]				MICRA:
	E. Siu[illegible]	4/5/03	7:10 PM	OTHER:
	[signature]			

New York City Department of Environmental Protection
Bureau of Air, Noise & Hazardous Materials
Division of Emergency Response and Technical Assessment
96-05 Horace Harding Expressway
Corona, New York 11368

(3)

AIR MONITORING DATA SHEET & CHAIN OF CUSTODY FORM

T03-04-007

PROJECT INFORMATION

1. PROJECT NAME: ECB. Mahattan		2. ADDRESS: 66 John St	3. BORO: Manh
4. DATE: 4/5/03	5. AIR MONITOR: Emmanuel/Brutus	6. (a) Background: __ (b) OSHA: __ (c) Pre-Abate: __ (d) PostAbate: __ (e) Abatement: __ (f) Ambient: __ (g) PCM(0.8μMCE) __ (h) TEM (0.45μMCE) __	

AIR SAMPLING DATA ROTOMETER No:

7. Sample ID	8. Pump No:	9. Sample Location	10. Start Time	End Time	Total Mins	11. Start Flow	End Flow	Avg. Flow	12. Total Vol (L)	[illegible]	[illegible]
307/019		Next to 'DOF Imaging' Room	2:25	4:55	150	10	10	10	1500	[illegible]	[illegible]
307/020		Next to 'Central File' Room	2:27	4:57	150	10	9.5	9.75	1468.50	[illegible]	[illegible]
307/021		At the center/front of cubicle #28 Global Work	2:40	5:10	150	10	10	10	1500	[illegible]	[illegible]

CHAIN OF CUSTODY Turnaround Time: 2hrs __ 6hrs __ 24hrs __ 48hrs __ 72hrs __

13. Relinquished by	14. Received by	15. Date	16. Time	17. Analysis Requested
1. E. Brutus	1. A. Sogica	04/05/03	5:30 pm	NIOSH 7400:
2. E. [signature]	2. [signature]			AHERA:
3.	3. G. Spaukin	4/5/03	7:10 PM	OTHER:
4.	4. [signature]			
5.	5.			
6.	6.			

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Tel (718) 784-7490
Fax (718) 784-4085

AIRBORNE ASBESTOS ANALYSIS BY TRANSMISSION ELECTRON MICROSCOPY

CLIENT: NYC DEP
LABORATORY ID #: T03-04-007
ANALYT. METHODOLOGY: AHERA
FILTER TYPE: M.C.E.
AVERAGE G.O. AREA (mm^2): 0.012820

PROJECT: 59 Maiden Lane & 66 John Street.
DATE OF REPORT: 04/07/03
DATE OF ANALYSIS: 04/05/03
EFFECTIVE FILTER AREA (mm^2): 385

LABORATORY RESULTS

CLIENT #	LAB. ID #	LOCATION	VOLUME (lt)	G.O.'s ANALYZED	AREA ANALYZED (mm^2)	ANALYT. SENSITIV. (struct./cm^2)	TOTAL ASBESTOS AIR CONC. (struct./cm^2)	TOTAL ASBESTOS FILTER CONC. (str./mm^2)	AIR CONC. FOR STRUCT. 0.5≤S<5µm	AIR CONC. FOR STRUCT. S≥5.0µm	ASBEST. TYPE CHRYS.	AMPHIB. ASBEST TYPE · SPECIFY
302/014	T03-04-007-651	North side/John St. side –Nassau	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
302/015	T03-04-007-652	North side/John St. side	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
302/016	T03-04-007-653	North side/John St. side-William	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
Lab3/017	T03-04-007-654	9th floor DOF/central file (outside of)	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA
Lab3/018	T03-04-007-655	9th floor file 681 (outside of)	1500	4	0.0513	0.0050	<0.0050	<19.50	NA	NA	NA	NA

ANALYST
E. Sioukri

LABORATORY DIRECTOR
Spiro Dongaris

LABORATORY CERTIFICATION NUMBERS: NVLAP 101958, ELAP 10955

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