

Lee Tai Enterprises USA Ltd
Construction Operations

420 Madison Avenue, Suite 505
New York, NY 10017
Ph 212.317.9835 Fax 212.317.0714

March 12, 2002

R. Radhakrishnan, P.E.
Director,
Asbestos Control Program
The City of New York
Department of Environmental Protection
59-17 Junction Boulevard
Corona, NY 11368-5107

Re: 19 Park Place, aka Block 124 / Lot 8

Subject: **Results of Bulk Sampling for Potential ACM**

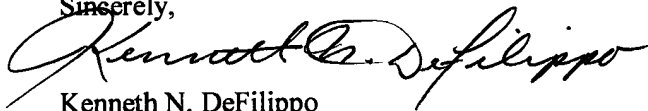
Dear Mr. Radhakrishnan:

Please be advised that we are now providing your office with the results of the laboratory report furnished to us by our abatement contractor for potential ACM at the captioned premises in accordance with your original request.

We were pleased to learn that the analyses of the bulk samples resulted in less than one (1) percent asbestos utilizing recommended testing procedures.

We appreciate being granted this extension of time in order to meet the Department's requirements and we trust that your office will maintain these findings for future reference.

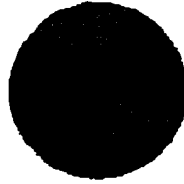
Sincerely,



Kenneth N. DeFilippo
Client-Owner Representative
Manager, Construction Operations
Lee Tai Enterprises USA Ltd.

Enclosures: - Cover, United Environmental
- Analysis Procedure, 2 pgs.
- Lab Report, Scientific labs, 3 pgs.

cc: Nancy L. Luk
(Project Chrono File)



UNITED ENVIRONMENTAL SAFETY, INC.
126-12 34th AVENUE CORONA, NY 11368
TEL: (718) 476-7733 FAX: (718) 476-3311

March 8, 2002

Mr. Kenneth N. DeFilippo
Lee Tai Enterprises USA Ltd.
420 Madison Avenue, Suite 505
New York, N.Y. 10017

Re: 19 Park Place, New York, N.Y. (Roof)

Dear Mr. DeFilippo:

The undersigned, a State of New York Certified Asbestos Inspector from United Environmental Safety, Inc. collected samples of suspect debris from the roof of 19 Park Place, New York, on March 5, 2002.

The purpose of the sampling was to determine whether asbestos-containing debris were present on the roof of the above referenced location. A total of five (5) representative bulk samples were collected of the residual debris. All five of the bulk samples tested (less than 1%) asbestos by Polarized Light Microscopy (NYSDOH ELAP Method 198).

Attached, please find a description of the bulk sampling and sample analysis protocols used during this project and the Bulk Sample Laboratory Data Report for this project.

Should you have any questions, please do not hesitate to call me at the above phone number.

Sincerely,
Signed for U.E.S. by:

Michael Fuller
Certified Asbestos Inspector # AH96-09193

Bulk Sample Collection and Asbestos Analysis Procedures:

Representative bulk samples were collected by penetrating the total depth of the material with a sample container providing a core of all materials present. Representative sampling is based upon the material's physical character and distribution throughout the survey area.

The sample is first determined in the laboratory to be either friable or non-friable, organically-bound (NOB), and either homogenous or heterogeneous.

Sample analyses of both friable and NOB materials are performed in accordance with procedures described in the New York State Department of Health Environmental Laboratory Approval Program (NYSDOH ELAP) Certification Manual as "Polarized-Light Microscope Methods for Identifying and Quantitating Asbestos in Bulk Samples," Item No. 198.1, dated 03/01/97.

If the analysis of a friable material reveals the presence of asbestos, the asbestos is quantified by type and the asbestos concentration is expressed as a percentage of the total matrix. The total amount of asbestos in the sample is also reported. If the analysis of a friable material indicates the presence of asbestos but at a concentration less than 1% of the total matrix, the result is reported as a trace for each type of asbestos found. If the analysis of a friable material does not indicate the presence of asbestos, the result is reported as no asbestos detected ("NAD").

All NOB materials are gravimetrically reduced by ashing and acid digestion prior to analysis. If the weight of the residue after ashing and acid digestion is less than 1% of the starting weight, then the results are reported as non-asbestos containing (i.e., less than 1% asbestos by weight). If the analysis of an NOB residue which weighs 1% or more of the starting weight reveals the presence of asbestos, the asbestos is quantified by type and the asbestos concentration is expressed as a percentage of the total matrix. The total amount of asbestos in the sample is also reported.

If the analysis of an NOB material does not reveal the presence of asbestos, the results are reported as inconclusive by polarized light microscopy (neither negative nor positive for asbestos). Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. Before this material can be considered or treated as non-asbestos containing, confirmation must be made by quantitative transmission electron microscopy (TEM).

Sample analysis of NOB materials by transmission electron microscopy is performed in accordance with procedures described in the NYSDOH ELAP Certification Manual as "Transmission Electron Microscope Method for Identifying and Quantitating Asbestos in Non-Friable Organically Bound Bulk Samples," Item No. 198.4, dated 03/01/97.

Page 3.

If the TEM analysis of an NOB material reveals the presence of asbestos, the asbestos is quantified by type and the asbestos concentration is expressed as a percentage of the total matrix. The total amount of asbestos in the sample is also reported. If the analysis of an NOB material indicates the presence of asbestos but at a concentration less than 1% of the total matrix, the result is reported as a trace for each type of asbestos found. If the analysis of an NOB material does not indicate the presence of asbestos, the result is reported conclusively as no asbestos detected ("NAD").

Appendix A.
Bulk Sample Data Report



SCIENTIFIC LABORATORIES, INC.

117 EAST 30TH STREET
NEW YORK, NY 10016

TEL: (212) 679-8600 • FAX: (212) 679-9392

PLM Bulk Asbestos Report

United Environmental Safety, Inc.
Attn: Mark Katz
126-12 34th Avenue
Corona, NY 11368

Date Received 03/07/2002 SciLab Job No. 202031671
Date Examined 03/07/2002 P.O. # Lee Tai Enterprises
ELAP Number 11480 Page 1 of 2
RE: Lee Tai Enterprises; 19 Park Place, NYC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#001	202031671-01	Yes	<1.1.2 %
1	Location: Roof Northwest Section		
	Description: Grey, Heterogeneous, Debris		
	Asbestos Types: Chrysotile 0.75 %		
	Other Material: Animal hair 3. %, Cellulose 12. %, Fibrous glass 40. %, Synthetic fibers 5. %, Non-fibrous 39.25 %		
#002	202031671-02	Yes	<1.1.2 %
1	Location: Roof Northeast Section		
	Description: Grey, Heterogeneous, Debris		
	Asbestos Types: Chrysotile Trace		
	Other Material: Animal hair 3. %, Cellulose 10. %, Fibrous glass 25. %, Synthetic fibers 1. %, Non-fibrous 61. %		
#003	202031671-03	Yes	<1.1.2 %
1	Location: Roof Center Location		
	Description: Grey, Heterogeneous, Debris		
	Asbestos Types: Chrysotile Trace		
	Other Material: Animal hair 2. %, Cellulose 2. %, Fibrous glass 10. %, Synthetic fibers 1. %, Non-fibrous 85. %		
#004	202031671-04	Yes	<1.1.2 %
1	Location: Roof Southwest Section		
	Description: Grey, Heterogeneous, Debris		
	Asbestos Types: Chrysotile Trace		
	Other Material: Animal hair 2. %, Cellulose 3. %, Fibrous glass 10. %, Synthetic fibers 1. %, Non-fibrous 84. %		

**SCIENTIFIC LABORATORIES, INC.**117 EAST 80TH STREET
NEW YORK, NY 10018

TEL: (212) 679-8600 • FAX: (212) 678-9392

PLM Bulk Asbestos ReportUnited Environmental Safety, Inc.
Attn: Mark Katz
126-12 34th Avenue
Corona, NY 11368Date Received 03/07/2002 SciLab Job No. 202031671
Date Examined 03/07/2002 P.O. # Lee Tai Enterprises
ELAP Number 11480 Page 2 of 2
RE: Lee Tai Enterprises; 19 Park Place, NYC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#005	202031671-05	Yes	^{1,2} <1.0%
1	Location: Roof Southeast Section		
Description: Grey, Heterogeneous, Debris			
Asbestos Types: Chrysotile 0.25 %			
Other Material: Animal hair 3. %, Cellulose 3. %, Fibrous glass 15. %, Synthetic fibers 2. %, Non-fibrous 76.75 %			

Reporting Notes:

(1) Positive samples (<10%) analyzed by EPA Point Count Method (400 points).

(2) Composite analysis results for heterogeneous debris samples may be highly variable due to inhomogeneities in materials present

Analyzed by: Bella Chernis

*NAD/NSD = no asbestos detected; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis by EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200546-0) and ELAP PLM Analysis Protocol 198.1 for New York samples (NYSDOH ELAP Lab # 11480); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested. AIHA# 102843; VT Cert# AL016055

Reviewed By: _____



Lee Tai Enterprises USA Ltd

Construction Operations

420 Madison Avenue, Suite 505
New York, NY 10017
Ph 212.317.9835 Fax 212.317.9714

February 19, 2002

Via FAX & paper mail

R. Radhakrishnan, P.E.,
Director,
Asbestos Control Program
The City of New York
Department of Environmental Protection
59-17 Junction Boulevard
Corona, New York 11368-5107

Re: 19 Park Place, aka Block 124, Lot 8

Subject: Laboratory Report, Potential Environmental Hazard Assessments

Dear Mr. Radhakrishnan:

Please be advised that we are in receipt of the Department's February 8th and February 12th, 2002 memorandums requesting copies of the assessments that were to be made as a result of performing bulk sampling for ACM on the roof of the captioned premises. Unfortunately, we had not received the September, 2001 advisement that was referenced within your February 12th letter.

At this writing, we are hereby requesting that we be granted an extension for performing the gathering of samples and subsequent testing for suspect ACM's as we are prepared to continue to cooperate with the Department.

We are in the process of securing the services of a licensed abatement contractor in order to comply with the Department's requests as referenced above and will forward those results to your office as soon as they become available.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth N. DeFilippo", written over the typed name.

Kenneth N. DeFilippo
Client-Owner Representative
Lee Tai Enterprises USA Ltd.
Mgr., Construction Operations

Cc: Nancy L. Luk

02/14/02 11:32 FAX 5162561728

NANCY LUK

02

**Department of
Environmental
Protection**59-17 Junction Boulevard
Corona, New York
11368-5107**Joel A. Miele Sr., P.E.
Commissioner****Robert C. Avaltroni
Deputy Commissioner****Bureau of
Environmental Compliance**
Tel (718) 595-4418
Fax (718) 595-4422**ABN Realty LLC
PO BOX 722
Valley Stream, NY 11582****Subject: 19 PARK PLACE
16 Murray Street****February 12, 2002****Dear Sir/ Madam:**

In September 2001, the New York City Department and Environmental Protection (NYC DEP) and the Department of Health (NYC DOH) advised building owners regarding building maintenance and re-occupancy issues following the collapse of the World Trade Center. The steps included the professional assessment of building contamination for possible hazardous components, including asbestos, and a retrospective filing, as required, if applicable.

The NYC DEP is hereby requesting copies of the environmental hazard assessments including bulk sample results and air monitoring results and a summary of clean-up activities at the above referenced site. Please forward the requested documents to our offices within FIVE BUSINESS DAYS. They may be faxed to (718) 595-3744 or sent to the NYC DEP Asbestos Control Program at 59-17 Junction Boulevard, 8th floor, Corona, New York 11373-5108.

Please be advised building owners are responsible for the cleaning of building exteriors, grounds, and common areas. Due to changing conditions and continued activity at Ground Zero, building owners should periodically assess the condition of building exteriors and air conditioning systems for cleanliness and may have to periodically re-clean areas. Adherence to proper cleaning methods is important for the protection of public health and the environment. DEP inspectors will be following up on this matter.

If you have any questions, you may reach the Department at (718) 595-3682 during office hours or the 24-hour Help Center at (718) DEP-HELP. DEP staff is available to provide guidance and technical assistance.

Sincerely,
**R. Radhakrishnan, P.E.
Director
Asbestos Control Program****RECEIVED**
FEB 14 2002

(718) DEP-HELP

02/13/02 14:53 FAX 5182581728

NANCY LUK

02

**Department of
Environmental
Protection**59-17 Junction Boulevard
Corona, New York
11368-5107**RECEIVED**
FEB 11 2002

February 8, 2002

**ABN REALTY LLC
P.O BOX 722
VALLEY STREAM, NY 11582****Joel A. Miele Sr., P.E.
Commissioner****Subject: 19 PARK PLACE, MANHATTAN****Robert C. Avaltroni
Deputy Commissioner****Dear Sir/ Madam:****Bureau of
Environmental Compliance
Tel (718) 595-4418
Fax (718) 595-4422**

The New York City Department of Environmental Protection in cooperation with the New York State Department of Labor and the United States Environmental Protection Agency has continued inspections/surveys of buildings in the vicinity of the World Trade Center.

During the recent inspections/surveys, visible debris from the collapse of the Towers was observed on the roof, ~~exterior~~, and/or facades of the above referenced building. In accordance with previously issued guidelines, copies of which are enclosed, these accumulations must be assessed by a NYC DEP certified investigator to determine whether the material is asbestos-containing material and then cleaned up appropriately.

Building owners are responsible for the cleaning of building exteriors, grounds, and common area. Due to changing conditions and continued activity at Ground Zero, building owners should periodically assess the condition of building exteriors and air conditioning systems for cleanliness and may have to periodically re-clean areas. Adherence to proper cleaning methods is important for the protection of public health and the environment.

If you have any questions, you may reach the Department at (718) 595-3682 during office hours or the 24-hour Help Center at (718) DEP-HELP.

Sincerely,
R. Radhakrishnan, P.E.**Director****Asbestos Control Program**

No enclosures
Re: DEP/ABN
2



(718) DEP-HELP

Address: 19 Park Place

Bulk Samples PLM Yes No

Number of Negative ($\leq 1\%$) Samples _____

Number of Positive ($> 1\%$) Samples _____

Air Samples Yes No

PCM

Number of Samples Collected (≤ 0.01 f/cc) _____

Number of Samples Collected (>0.01 f/cc) _____

TEM

Number of Samples Collected (≤ 70 s/mm²) _____

Number of Samples Collected (>70 s/mm²) _____

ASKING FOR EXTENSION

Jul 24 02 04:27p

Kenneth N. DeFilippo

212-317-9714

p.1

Lee Tai Enterprises USA Ltd.**Construction Operations**

Via Fax

420 Madison Avenue, Suite 505
New York, NY 10017
Ph 212-317-9835 Fax 212-317-9714

July 24, 2002

R. Radhakrishnan, P.E.
Director, Asbestos Control Program
The City of New York
Dept. of Environmental Protection
59-17 Junction Boulevard
Flushing, NY 11373-5108

Re: 19 Park Place / 16 Murray Street

Subject: Cleaning Program Confirmation

Dear Mr. Radhakrishnan:

As the owner of the referenced premises, we understand that the DEP has now completed all of the work associated with the Cleaning Program as indicated in your memo of May 3rd, 2002.

At this time, we are respectfully requesting confirmation from your office indicating that the referenced building has, in fact, been cleaned as a part of that program. You may respond to us by using the address or Fax number shown above.

Thank you for your cooperation.

Sincerely,



Kenneth N. DeFilippo
Manager, Construction Operations
Lee Tai Enterprises USA Ltd.

Cc: Nancy L. Luk