



Occupational Health, Safety &
Environmental Consultants

February 25, 2002

Mr. R. Radhakrishnan, P.E.
New York City Department of Environmental Protection
Director, Asbestos Control Program
59-16 Junction Boulevard
Corona, NY 11368-5107
Via Fax: 718.595.4422

Re: Pace University Property
106 Fulton Street, NY, NY

Dear Mr. Radhakrishnan,

Thank you for taking the time to talk with me on February 19, 2002 regarding your letter of February 17, 2002 (attached) that was issued to our client, Pace University. As I mentioned, the 106 Fulton Street building has been unoccupied since before September 11, 2001.

In response to your February 17th letter and in accordance with our conversation of February 19th, on February 19th a Colden Corporation NYC licensed asbestos investigator conducted a visual review of the exterior of 106 Fulton Street and collected ten bulk samples of dust from exterior surfaces. Samples were analyzed by Scientific Laboratories using Polarized Light Microscopy (PLM). Scientific Laboratories is an AIHA accredited and ELAP certified laboratory. A summary of the surfaces sampled and corresponding analytical results are presented below.

Sample ID	Surface sampled	Asbestos content in dust
# 106-1	Roof – NW corner on parapet wall	< 1 %
# 106-2	13 th floor exterior window ledge	< 1 %
# 106-3	8 th floor exterior window ledge	< 1 %
# 106-4	8 th floor exterior window ledge	< 1 %
# 106-5	2 nd floor exterior window ledge	< 1 %
# 106-6	Top of exterior construction elevator car	< 1 %
# 106-7	15 th floor exterior construction bridge	< 1 %
# 106-8	10 th floor exterior construction bridge	< 1 %
# 106-9	7 th floor exterior construction bridge	< 1 %
# 106-10	4 th floor exterior construction bridge	< 1 %

All sample analysis results are less than one-percent asbestos. Laboratory reports, chain of custody records and field data sheets in support of this data are attached.

It is our understanding that the City requires the building owner to remove accumulations of dust from exterior building surfaces. And, that asbestos handler licenses are not required for cleaning non-ACM dust, including dust reported to contain less than one-percent or trace asbestos as detected under PLM.

NYC DEP
R. Radhakrishnan
2/25/02

Pace University is in the process of developing specifications for cleaning of the building exterior. The intent is to retain a cleaning contractor (not an asbestos contractor) to remove the dust from the exterior building surfaces. Wet methods will be used by the cleaning contractor.

Based on our conversation, it is my understanding that bulk sampling for dust inside the building is not required because the 106 Fulton Street Property was not physically damaged as a result of the 9/11 incidents; bulk debris resulting from the collapse of the World Trade Center is not visible inside the building; and the building's physical barriers (windows, doors, walls, roof) were not broken as a result of the Trade Center collapse.

It is the intent of Pace University to be in exact conformance with the Department of Environmental Protection's requirements and requests related to this matter. Therefore, please contact me at 215.496.9237 if any additional action is required in response to the subject letter.

Thank you for your time and consideration.

Sincerely,
Colden Corporation



David R. de Lalla
President

Attachments: 1. NYCDEP Letter Re: 106 Fulton Street (1 page)
2. Laboratory report, chain of custody records, field data sheets (6 pages)

cc: Pace University: S. Brodsky, D. MacDougall, W. Link, S. Irvine

Feb-19-02 09:39A

P.01

COLDEN 215-496-9280

February 17, 2002



**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

Building Owner Name: _____

Address: _____

106 Fulton St
NYC

Subject: _____

Dear Sir/Madam:

In September 2001, the New York City Department of Environmental Protection (NYCDEP) and the Department of Health (NYCDOH) advised building owners regarding building maintenance and re-occupancy issues following the collapse of the World Trade Center. The steps included the assessment of building contamination for possible hazardous components, including asbestos.

Today, a visual survey of your building's exterior was conducted as a follow up to DEP's October survey of buildings around the World Trade Center site. At the above referenced site, visible dust accumulations were observed at:

- ☒ building facade(s)
- ☐ setback(s)
- ☒ roof
- ☐ other, _____

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.

Please provide information regarding your actions to address the dust accumulations by February 27, 2002. Copies of the environmental hazard assessments including bulk sample results, air monitoring results and/or a summary of clean-up activities at the above-referenced site may be faxed to (718) 595-3744 or sent to the NYCDEP Asbestos Control Program at 59-17 Junction Boulevard, 8th floor, Corona, New York 11373-5108.

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



Mr. G. Rissler

Sincerely,

[Signature]
R. Radhakrishnan, P.E.
Director
Asbestos Control Program

**SCIENTIFIC LABORATORIES, INC.**

117 EAST 30TH STREET

NEW YORK, NY 10016

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

PLM Bulk Asbestos Report

Colden Corporation
Attn: David DeLalla
Robert Morris Building
100 North 17th St. 9th Fl.
Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855

Date Examined 02/19/2002 P.O. # 01220

Page 1 of 3

RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#106-1	202022855-01	Yes	<1. % ^{2, 1}
Location: Roof NW Corner, On Parapet Wall Off Piece of Wood			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 8. %, Fibrous glass 40. %, Synthetic fibers 3. %, Non-fibrous >47. %			
#106-2	202022855-02	Yes	<1. % ^{2, 1}
Location: 13th Floor-NE, Apartment #1303, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile Trace			
Other Material: Animal hair Trace, Cellulose 3. %, Fibrous glass 40. %, Synthetic fibers Trace, Non-fibrous 57. %			
#106-3	202022855-03	Yes	<1. % ^{2, 1}
Location: 8th Floor-NE Apartment #803, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 8. %, Fibrous glass 35. %, Synthetic fibers 1. %, Non-fibrous >54. %			
#106-4	202022855-04	Yes	<1. % ^{2, 1}
Location: 8th Floor-NW Apartment #801, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair Trace, Cellulose 7. %, Fibrous glass 35. %, Synthetic fibers 1. %, Non-fibrous >56. %			

**SCIENTIFIC LABORATORIES, INC.**117 EAST 30TH STREET
NEW YORK, NY 10018

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

PLM Bulk Asbestos ReportColden Corporation
Attn: David DeLalla
Robert Morris Building
100 North 17th St. 9th Fl.
Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855
 Date Examined 02/19/2002 P.O. # 01220
 Page 2 of 3
 RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos ^{2, 1}
#106-5	202022855-05	Yes	<1.0%

Location: 2nd Floor-On NE Window Ledge

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile Trace

Other Material: Animal hair Trace, Cellulose 3. %, Fibrous glass 35. %, Synthetic fibers Trace, Non-fibrous 62. %

#106-6	202022855-06	Yes	<1.0% ^{2, 1}
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Location: From Top of Construction Elevator Car

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1. %

Other Material: Animal hair 1. %, Cellulose 14. %, Fibrous glass 25. %, Synthetic fibers 2. %, Non-fibrous >57. %

#106-7	202022855-07	Yes	<1.0% ^{2, 1}
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Location: 15th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1. %

Other Material: Animal hair Trace, Cellulose 7. %, Fibrous glass 30. %, Synthetic fibers 1. %, Non-fibrous >61. %

#106-8	202022855-08	Yes	<1.0% ^{2, 1}
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Location: 10th Floor-From "Bridge" Structure: Off Floor Planking Closest to Building Facade

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1. %

Other Material: Animal hair 1. %, Cellulose 6. %, Fibrous glass 30. %, Synthetic fibers 2. %, Non-fibrous >60. %

FEB-19-2002 17:32

SCIENTIFIC LABS

212 679 9392 P.04/07

**SCIENTIFIC LABORATORIES, INC.**

117 EAST 30TH STREET

NEW YORK, NY 10016

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

PLM Bulk Asbestos Report

Colden Corporation
 Attn: David DeLalla
 Robert Morris Building
 100 North 17th St. 9th Fl.
 Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855
 Date Examined 02/19/2002 P.O. # 01220
 Page 3 of 3
 RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos ^{2,1}
#106-9	202022855-09	Yes	<1. %

Location: 7th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1. %

Other Material: Animal hair 1. %, Cellulose 6. %, Fibrous glass 30. %, Synthetic fibers 1. %, Non-fibrous >61. %

#106-10	202022855-10	Yes	<1. % ^{2,1}
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Location: 4th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls

Description: Grey, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1. %

Other Material: Animal hair Trace, Cellulose 8. %, Fibrous glass 30. %, Synthetic fibers 1. %, Non-fibrous >60. %

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 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: _____



Rye Van Dusen (COLDEN)
70 Longden Rd.
Fairfield, CT 06430-6551

Company Name:	Colder Corporation
Site Name:	PACE University - #106 Fulton St., NYC
Sampled By:	H.R. Van Deusen
Project #:	01220

Send Report to: Rye Van Dusen (GOLDEN)
70 Longdon Rd.
Fairfield, CT 06430-6551

Invoice to: COLDEN Corporation
100 N. 17th Street
Philadelphia, PA

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____
☐ Verbal Authorization _____

Card # Exp Date

☐ **Standard Turn-Around Time**

OR ☒ Rush: Date and Time Requested: Immediate TAT
pm

Phone Results to: Ryc Van Densen

Phone # (203) - 545 - 7525 ext. _____

☒ Fax Results to: Ryc Van Deusen

Fax # (208) 692-6051

☒ Fax ☐ Email Results to: David de Lalla

Fax # 215-496-9280

[illegible]

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area): * See Attached for Sample *
* CALL w/ Verbal Results ASAP * Locations

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Hobart R. Van Dusen	<i>[Signature]</i>	2-19-02
Received by LAB:	C. DAVIS	<i>[Signature]</i>	2-19-02

Samples received after 3pm will be considered as next day's business.

LAB COPY

#106 Fulton Street

202024855

2-19-02

SAMPLESSAMPLE LOCATION:

- ① #106-1 - Roof - NW Corner - on Parapet
Wall off piece of
Wood.
- ② #106-2 - 13th Floor - N.E. Apt. #1303
- outside - on A/C
Window Unit
- ③ #106-3 - 8th Floor - N.E. Apt. #803:
- outside - on A/C
Window Unit
- ④ #106-4 - 8th Floor - N.W. Apts # 801;
- outside - on A/C
Window Unit
- ⑤ #106-5 - 2nd Floor - on
N.E. Window Ledge.

FEB-19-2002 17:03

SCIENTIFIC LABS

212 679 9392 P.05/05

#106 tulton 310

2-19-02

SAMPLES:

202022855

SAMPLE

Location:

- (6) #106-6 - from Top of Construction
Elevator car
- (7) #106-7 - 15th Floor - from "Bridge"
Structure:
- off wood framing of
fall protection walls
- (8) #106-8 → 10th Floor - from "Bridge"
Structure:
- off Floor Planking
Closest to Bldg. facade
- (9) #106-9 - 7th Floor - from "Bridge"
Structure:
- off wood framing of
fall protection walls
- (10) #106-10 - 4th Floor - from "Bridge"
Structure:
- off wood framing
of fall protection walls

TOTAL P.05



Occupational Health, Safety &
Environmental Consultants

Fax Transmittal

To: *Mr. R. RADHAKRISHNAN, P.E.* Date: *2-26-02*

Fax: *718-595-4422*

From: *James A. Bely*

Phone: (215) 496-9237 Fax: (215) 496-9280

Re: *Pace University Property - 106 Fulton St, NY, NY*

Total pages including cover: *10*

Robert Morris Building . 100 North 17th Street, 9th Floor . Philadelphia, PA 19103
Tel 215 496 9237 . Fax 215 496 9280 . Toll Free 800 586 5580 . www.colden.com



Occupational Health, Safety &
Environmental Consultants

February 25, 2002

Mr. R. Radhakrishnan, P.E.
New York City Department of Environmental Protection
Director, Asbestos Control Program
59-16 Junction Boulevard
Corona, NY 11368-5107
Via Fax: 718.595.4422

Re: Pace University Property
106 Fulton Street, NY, NY

Dear Mr. Radhakrishnan,

Thank you for taking the time to talk with me on February 19, 2002 regarding your letter of February 17, 2002 (attached) that was issued to our client, Pace University. As I mentioned, the 106 Fulton Street building has been unoccupied since before September 11, 2001.

In response to your February 17th letter and in accordance with our conversation of February 19th, on February 19th a Colden Corporation NYC licensed asbestos investigator conducted a visual review of the exterior of 106 Fulton Street and collected ten bulk samples of dust from exterior surfaces. Samples were analyzed by Scientific Laboratories using Polarized Light Microscopy (PLM). Scientific Laboratories is an AIHA accredited and ELAP certified laboratory. A summary of the surfaces sampled and corresponding analytical results are presented below.

Sample ID	Surface sampled	Asbestos content in dust
# 106-1	Roof - NW corner on parapet wall	< 1 %
# 106-2	13 th floor exterior window ledge	< 1 %
# 106-3	8 th floor exterior window ledge	< 1 %
# 106-4	8 th floor exterior window ledge	< 1 %
# 106-5	2 nd floor exterior window ledge	< 1 %
# 106-6	Top of exterior construction elevator car	< 1 %
# 106-7	15 th floor exterior construction bridge	< 1 %
# 106-8	10 th floor exterior construction bridge	< 1 %
# 106-9	7 th floor exterior construction bridge	< 1 %
# 106-10	4 th floor exterior construction bridge	< 1 %

All sample analysis results are less than one-percent asbestos. Laboratory reports, chain of custody records and field data sheets in support of this data are attached.

It is our understanding that the City requires the building owner to remove accumulations of dust from exterior building surfaces. And, that asbestos handler licenses are not required for cleaning non-ACM dust, including dust reported to contain less than one-percent or trace asbestos as detected under PLM.

NYC DEP
R. Radhakrishnan
2/25/02

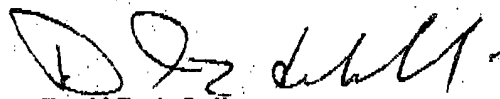
Pace University is in the process of developing specifications for cleaning of the building exterior. The intent is to retain a cleaning contractor (not an asbestos contractor) to remove the dust from the exterior building surfaces. Wet methods will be used by the cleaning contractor.

Based on our conversation, it is my understanding that bulk sampling for dust inside the building is not required because the 106 Fulton Street Property was not physically damaged as a result of the 9/11 incidents; bulk debris resulting from the collapse of the World Trade Center is not visible inside the building; and the building's physical barriers (windows, doors, walls, roof) were not broken as a result of the Trade Center collapse.

It is the intent of Pace University to be in exact conformance with the Department of Environmental Protection's requirements and requests related to this matter. Therefore, please contact me at 215.496.9237 if any additional action is required in response to the subject letter.

Thank you for your time and consideration.

Sincerely,
Colden Corporation



David R. de Lalla
President

Attachments: 1. NYCDEP Letter Re: 106 Fulton Street (1 page)
2. Laboratory report, chain of custody records, field data sheets (6 pages)

cc: Pace University: S. Brodsky, D. MacDougall, W. Link, S. Irvine

02/26/2002 11:11 2154969280

COLDEN CORPORATION

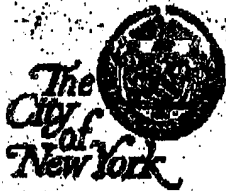
PAGE 04

Feb-19-02 09:39A

P.01

COLDEN 215-496-9280
9280

February 17, 2002



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Corona, New York
11365-5108

Joel A. Mile Sr., P.E.
Commissioner

Robert C. Avallanti
Deputy Commissioner

**Bureau of
Environmental Compliance**
Tel (718) 595-4418
Fax (718) 595-4422

Building Owner Name: _____

Address: _____

106 Fulton St
NYC

Subject: _____

Dear Sir/Madam:

In September 2001, the New York City Department of Environmental Protection (NYCDEP) and the Department of Health (NYCDOH) advised building owners regarding building maintenance and re-occupancy issues following the collapse of the World Trade Center. The steps included the assessment of building contamination for possible hazardous components, including asbestos.

Today, a visual survey of your building's exterior was conducted as a follow up to DEP's October survey of buildings around the World Trade Center site. At the above referenced site, visible dust accumulations were observed at:

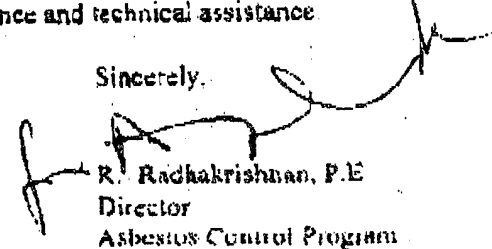
- ☒ building facade(s)
- ☒ setback(s)
- ☒ roof
- ☐ other, _____

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.

Please provide information regarding your actions to address the dust accumulations by February 27, 2002. Copies of the environmental hazard assessments including bulk sample results, air monitoring results and/or a summary of clean-up activities at the above-referenced site may be faxed to (718) 595-3744 or sent to the NYCDEP Asbestos Control Program at 59-17 Junction Boulevard, 8th floor, Corona, New York 11373-5108

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

Sincerely,


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

Mr. G. Rissler



02/26/2002 11:11 2154969280

GOLDEN CORPORATION

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Feb-19-2002 16:56

SCIENTIFIC LABS

212 679 9392 P.02/03

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

TEL: (212) 679-8600 • FAX: (212) 878-8392

PLM Bulk Asbestos Report

Colden Corporation
Attn: David DeLalla
Robert Morris Building
100 North 17th St. 9th Fl.
Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855

Date Examined 02/19/2002 P.O. # 01220

Page 1 of 3

RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#106-1	202022855-01	Yes	<1. % ^{2,1}
Location: Roof-NW Corner, On Parapet Wall Off Piece of Wood			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 8. %, Fibrous glass 40. %, Synthetic fibers 3. %, Non-fibrous >47. %			
#106-2	202022855-02	Yes	<1. % ^{2,1}
Location: 13th Floor-NE, Apartment #1303, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile Trace			
Other Material: Animal hair Trace, Cellulose 3. %, Fibrous glass 40. %, Synthetic fibers Trace, Non-fibrous 57. %			
#106-3	202022855-03	Yes	<1. % ^{2,1}
Location: 8th Floor-NE Apartment #803, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 8. %, Fibrous glass 35. %, Synthetic fibers 1. %, Non-fibrous >54. %			
#106-4	202022855-04	Yes	<1. % ^{2,1}
Location: 8th Floor-NW Apartment #801, Outside on A/C Window Unit			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair Trace, Cellulose 7. %, Fibrous glass 35. %, Synthetic fibers 1. %, Non-fibrous >56. %			

**SCIENTIFIC LABORATORIES, INC.**117 EAST 30TH STREET
NEW YORK, NY 10018

TEL: (212) 679-8000 • FAX: (212) 679-9392

PLM Bulk Asbestos ReportColden Corporation
Attn: David DeLalla
Robert Morris Building
100 North 17th St. 9th Fl.
Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855
 Date Examined 02/19/2002 P.O. # 01220
 Page 2 of 3
 RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#106-5	202022855-05	Yes	<1.0% ^{2,1}
Location: 2nd Floor-On NE Window Ledge			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile Trace			
Other Material: Animal hair Trace, Cellulose 3. %, Fibrous glass 35. %, Synthetic fibers Trace, Non-fibrous 62. %			
#106-6	202022855-06	Yes	<1.0% ^{2,1}
Location: From Top of Construction Elevator Car			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 14. %, Fibrous glass 25. %, Synthetic fibers 2. %, Non-fibrous >57. %			
#106-7	202022855-07	Yes	<1.0% ^{2,1}
Location: 15th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair Trace, Cellulose 7. %, Fibrous glass 30. %, Synthetic fibers 1. %, Non-fibrous >61. %			
#106-8	202022855-08	Yes	<1.0% ^{2,1}
Location: 10th Floor-From "Bridge" Structure: Off Floor Planking Closest to Building Facade			
Description: Grey, Heterogeneous, Bulk Dust			
Asbestos Types: Chrysotile <1. %			
Other Material: Animal hair 1. %, Cellulose 6. %, Fibrous glass 30. %, Synthetic fibers 2. %, Non-fibrous >60. %			

02/26/2002 11:11 2154969280

COLDEN CORPORATION

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FEB-19-2002 17:32

SCIENTIFIC LABS

212 679 9392

P.04/07

**SCIENTIFIC LABORATORIES, INC.**

117 EAST 30TH STREET

NEW YORK, NY 10016

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

PLM Bulk Asbestos Report

Colden Corporation
Attn: David DeLalla
Robert Morris Building
100 North 17th St. 9th Fl.
Philadelphia, PA 19103

Date Received 02/19/2002 SciLab Job No. 202022855

Date Examined 02/19/2002 P.O. # 01220

Page 3 of 3

RE: 01220; Pace University; 106 Fulton Street, NY, NY

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
#106-9	202022855-09	Yes	<1.0% ^{2,1}

Location: 7th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls

Description: Gray, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1.0%

Other Materials: Animal hair 1.0%, Cellulose 6.0%, Fibrous glass 30.0%,
Synthetic fibers 1.0%, Non-fibrous >61.0%

#106-10	202022855-10	Yes	<1.0% ^{2,1}
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Location: 4th Floor-From "Bridge" Structure: Off Wood Framing of Fall Protection Walls

Description: Gray, Heterogeneous, Bulk Dust

Asbestos Types: Chrysotile <1.0%

Other Materials: Animal hair Traces, Cellulose 8.0%, Fibrous glass 30.0%,
Synthetic fibers 1.0%, Non-fibrous >60.0%

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 (NYLAB Lab #200346-0) 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-triable 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. AIAA# 102843; VT Cert# AL016055

Reviewed By: _____

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GOLDEN CORPORATION

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GOLDEN CORPORATION

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Samples received after 4pm will be considered as next day's business.

LAB COPY

106 Fulton Street

202024855

2-19-02

SAMPLESSAMPLE
LOCATION:

- ① # 106-1 - Roof - NW Corner - on Parapet
Wall off piece of
wood.
- ② # 106-2 - 13th Floor - N.E. Apt. #1303
- outside - on A/C
Window Unit
- ③ # 106-3 - 8th Floor - N.E. Apt. #803:
- outside - on A/C
Window Unit
- ④ # 106-4 - 8th Floor - N.W. Apt. #801:
- outside - on A/C
Window Unit
- ⑤ # 106-5 - 2nd Floor - on
N.E. Window Ledge

106 Fulton St.

SAMPLES:

202022855

2-19-02

SAMPLE

Location:

⑥ #106-6 - from Top of Construction
Elevator car

⑦ #106-7 - 15th Floor - from "Bridge"
Structure:
- off Wood framing of
fall protection walls

⑧ #106-8 - 10th Floor - from "Bridge"
Structure:
- off Floor Planking
Closest to Bldg. Facade

⑨ #106-9 - 7th Floor - from "Bridge"
Structure:
- off Wood framing of
fall protection walls

⑩ #106-10 - 4th Floor - from "Bridge"
Structure:
- off Wood framing
of fall protection walls