

Sylvan Lawrence Company, Inc.

SUITE 1600 • 1350 AVENUE OF THE AMERICAS • NEW YORK, N.Y. 10019-4702 • TEL (212) 344-0044 • FAX (212) 422-0184

CERTIFIED MAIL R.R.R.

May 16, 2002

Mr. R. Radhakrisnan, P.E.
 Director, Asbestos Control Program
 Department of Environmental Protection
 59-17 Junction Boulevard
 Flushing, NY 11373-5108

Subject: 105 Broad Street, New York, NY

Dear Mr. Radhakrisnan:

We have received your correspondence dated May 3, 2002 concerning the above subject property.

Prior to your May 3rd correspondence we had received an earlier correspondence from you dated April 12, 2002, whereupon we immediately contacted our environmental consultant and directed him to make an investigation based on your April 12, 2002 correspondence.

We have enclosed the results of the now completed investigation and report in its entirety.

Based on the findings we respectfully request that 105 Broad Street be excluded from your proposed program for the following reasons:

- A) 105 Broad Street is a five story walk-up building. There is no staff at the property.
- B) We believe that the proposed process would cause the tenants of the building a great deal of disruption and inconvenience.

Thank you for your consideration in this matter.

Yours truly,


 JOHN GARVEY
 Director of Operations

JG/p
 Enclosure

ENTERED

GPS

GPS Environmental Consultants, Inc.
31 Trescott Path
Fort Salonga, New York 11768
Phone: (631) 269-4205, Fax: 269-9527 e-mail gps_environmental@msn.com

May 13, 2002

Mr. John Garvey
Director of Construction
Sylvan Lawrence Company, Inc.
100 William Street
New York, NY 10038

Re: 105 Broad Street – Assessment of WTC Contamination on Facade

Dear Jack:

As requested, an asbestos inspection was performed on April 19, 2002, at the above referenced project. The inspection was performed by Alan Palermo, NYS Asbestos Inspector employed by GPS Environmental Consultants, Inc. Dust samples were collected from various locations on the facade of the facility located at 105 Broad Street, New York, NY. A total of 12 samples were collected and analyzed for asbestos content using the Polarized Light Microscopic, PLM, analytical technique. The samples were analyzed by a properly licensed, independent, laboratory, Kam Consultants. All samples tested less than 1% for asbestos content. No asbestos containing materials were identified. A wipe sample was also collected and analyzed for heavy metals content. The amount of heavy metals identified were low, Please see enclosed results. Laboratory results are enclosed herein for your records.

If you have any questions, or require additional services please feel free to contact me.

Sincerely Yours,


Gregory P. Smyth
President

KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876



BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# :	1	2	3	4	5
Lab Sample ID# :	020419A-1644	020419A-1645	020419A-1646	020419A-1647	020419A-1648
Sample Location:	Window Broad Street Side	Window Broad Street Side	Window Broad Street Side	Window Water Street Side	Window Water Street Side
Homogeneity:	Yes	Yes	Yes	Yes	Yes
Sample Description:	Wipe	Wipe	Wipe	Wipe	Wipe
Color:	Wh/Blk	Wh/Blk	Blk	Blk	Wh/Bm
Texture:	Mixed	Mixed	Mixed	Mixed	Mixed
Sample Treatment:	None	None	None	None	None
Asbestos Present: (Type & Percent)	ND	ND	ND	ND	ND
Total Percent Asbestos:	0%	0%	0%	0%	0%
Other Fibr. Mat. (Type & Percent):	<1%CELL 3%SYNTH	<1%CELL 5%SYNTH	3%CELL 2%SYNTH	5%CELL 2%SYNTH	3%CELL 5%SYNTH
Non Fibr. Mat. (Percent):	96%	94%	95%	93%	92%
Date Received:	4/19/02				
Date of Analysis:	4/22/02				
Date of Report:	4/22/02				

Analyst:

R. Louis
Roody Louis

Lab Manager:

DC

David Chen

- * Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)
- * Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)
- * PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing
- * Samples will be stored for ninety (90) days and then returned to the client upon request
- * The results relate only to the items calibrated or tested.
- * The certificate of report shall not be reproduced without the written approval of the laboratory.
- * The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# :	6	8	9	10	11
Lab Sample ID# :	020419A-1649	020419A-1650	020419A-1651	020419A-1652	020419A-1653
Sample Location:	Bldg. Façade Broad Street Side	Bldg. Façade Broad Street Side	Bldg. Façade Water Street Side	Bldg. Façade Water Street Side	105 Broad Street Ent. Door
Homogeneity:	Yes	Yes	Yes	Yes	Yes
Sample Description:	Wipe	Wipe	Wipe	Wipe	Wipe
Color:	Wh	Wh/Br	Wh/Blk	Wh	Wh
Texture:	Mixed	Mixed	Mixed	Mixed	Mixed
Sample Treatment:	None	None	None	None	None
Asbestos Present: (Type & Percent)	ND	ND	ND	ND	ND
Total Percent Asbestos:	0%	0%	0%	0%	0%
Other Fibr. Mat. (Type & Percent):	30%SYNTH	5%SYNTH	<1%FBGL <1%CELL	3%SYNTH	5%SYNTH
Non Fibr. Mat. (Percent):	70%	95%	98%	97%	95%
Date Received:	4/19/02				
Date of Analysis:	4/22/02				
Date of Report:	4/22/02				

Analyst:

Roody Louis

Lab Manager:

David Chen

- * Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)
- * Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)
- * PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing
- * Samples will be stored for ninety (90) days and then returned to the client upon request
- * The results relate only to the items calibrated or tested.
- * The certificate of report shall not be reproduced without the written approval of the laboratory.
- * The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269



KAM CONSULTANTS
35 - 40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# : 12

Lab Sample ID# : 020419A-1654

Sample Location: Water Street
Entrance
Door

Homogeneity: Yes

Sample Description: Wipe

Color: Wh

Texture: Mixed

Sample Treatment: None

Asbestos Present:
(Type & Percent) ND

Total Percent
Asbestos: 0%

Other Fibr. Mat.
(Type & Percent): <1%FBGL
5%SYNTH

Non Fibr. Mat.
(Percent): 94%

Date Received: 4/19/02

Date of Analysis: 4/22/02

Date of Report: 4/22/02

Analyst: R. Louis

Roody Louis

Lab Manager: D.C.

David Chen

- * Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)
- * Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)
- * PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing
- * Samples will be stored for ninety (90) days and then returned to the client upon request
- * The results relate only to the items calibrated or tested.
- * The certificate of report shall not be reproduced without the written approval of the laboratory.
- * The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

Analytical Report
RCRA Metal Analysis by SW-846 Methods

Client Name: GPS Environmental Consultants, Inc.
31 Trescott Path, Fort Salonga, NY 11768

Date Sampled: 4/19/02
Date Received: 4/22/02
Date Analyzed: 04/23-24/02
Date Reported: 4/25/02

Project Name: 105 Broad Street, Manhattan, New York

Sample ID#: 7

Matrix: Wipe

KAM Lab ID#: C020422A

Analyte	SW-846 Method	MDL	Result
Pb	3050B/7420	5 µg/wp	15.59 µg/wp
Ag	3050B/7760	1 µg/wp	<1 µg/wp
Ni	3050B/7520	2 µg/wp	<2 µg/wp
Cr	3050B/7190	2.5 µg/wp	<2.5 µg/wp
Cd	3050B/7130	1 µg/wp	2.17 µg/wp
Ba	3050B/7080A	15 µg/wp	19.95 µg/wp
Hg	7471A	0.01 µg/wp	0.04 µg/wp

Analyst:

Mei Liu

Lab Manager:

David Chen

NYS ELAP ID# 11273

Sylvan Lawrence Company, Inc.

SUITE 1600 • 1350 AVENUE OF THE AMERICAS • NEW YORK, N.Y. 10019-4702 • TEL (212) 344-0044 • FAX (212) 422-0184

CERTIFIED MAIL R.R.R.

May 16, 2002

Mr. R. Radhakrisnan, P.E.
Director, Asbestos Control Program
Department of Environmental Protection
59-17 Junction Boulevard
Flushing, NY 11373-5108

Subject: 105 Broad Street, New York, NY

Dear Mr. Radhakrisnan:

We have received your correspondence dated May 3, 2002 concerning the above subject property.

Prior to your May 3rd correspondence we had received an earlier correspondence from you dated April 12, 2002, whereupon we immediately contacted our environmental consultant and directed him to make an investigation based on your April 12, 2002 correspondence.

We have enclosed the results of the now completed investigation and report in its entirety.

Based on the findings we respectfully request that 105 Broad Street be excluded from your proposed program for the following reasons:

- A) 105 Broad Street is a five story walk-up building. There is no staff at the property.
- B) We believe that the proposed process would cause the tenants of the building a great deal of disruption and inconvenience.

Thank you for your consideration in this matter.

Yours truly,


JOHN GARVEY
Director of Operations

JG/p
Enclosure

ENTERED

GPS

GPS Environmental Consultants, Inc.
31 Trescott Path
Fort Salonga, New York 11768
Phone: (631) 269-4205, Fax: 269-9527 e-mail gps_environmental@msn.com

May 13, 2002

Mr. John Garvey
Director of Construction
Sylvan Lawrence Company, Inc.
100 William Street
New York, NY 10038

Re: 105 Broad Street – Assessment of WTC Contamination on Facade

Dear Jack:

As requested, an asbestos inspection was performed on April 19, 2002, at the above referenced project. The inspection was performed by Alan Palermo, NYS Asbestos Inspector employed by GPS Environmental Consultants, Inc. Dust samples were collected from various locations on the facade of the facility located at 105 Broad Street, New York, NY. A total of 12 samples were collected and analyzed for asbestos content using the Polarized Light Microscopic, PLM, analytical technique. The samples were analyzed by a properly licensed, independent, laboratory, Kam Consultants. All samples tested less than 1% for asbestos content. No asbestos containing materials were identified. A wipe sample was also collected and analyzed for heavy metals content. The amount of heavy metals identified were low, Please see enclosed results. Laboratory results are enclosed herein for your records.

If you have any questions, or require additional services please feel free to contact me.

Sincerely Yours,


Gregory P. Smyth
President

GPS Environmental Consultants, Inc.

31 Trescott Path

Fort Salonga, NY 11768

Tel: 631 269 4205; Fax 631 269 9527

Form 1 of 2

020419A

Chain of Custody Record

Client: 105 Broad St

Page 1 of 1

Project Location: Bldg Facade

Date Sampled: 4-19-02

Address: 105 Broad St

Comments:

MANHATTAN

Sampled by _____

Type of Sample = W P=Pre-Abatement D=During Abatement POST=Post Abatement A=Ambient
 Analysis Type = PLM PCM=Phase Contrast Microscopy TEM=Transmission Electron Microscopy
 Lead Air=NIOSH 7082 PLM Polarized Light Microscopy W Wipe Sample

NO.	Sample ID	Sample Location	Sample Type		Total Volume (liters)	Analysis Type
			Air	Bulk		
1		window Broad St. side				
2		"				
3		"				
4		window water St. side				
5		"				
6		Bldg Facade Broad St side				
7		"				→ Analysis Requested For HEAVY METALS
8		"				
9		Bldg Facade water St. side				
10		"				
11		105 Broad St ent. door				
12		water St. ent door				

Relinquished By:	Date Time	Shipped By	Received by:	Date Time
A Palumbo	4-19-02	A Palumbo	AL	4-19-02 11:17

DOA - 4/22
21



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# :	1	2	3	4	5
Lab Sample ID# :	020419A-1644	020419A-1645	020419A-1646	020419A-1647	020419A-1648
Sample Location:	Window Broad Street Side	Window Broad Street Side	Window Broad Street Side	Window Water Street Side	Window Water Street Side
Homogeneity:	Yes	Yes	Yes	Yes	Yes
Sample Description:	Wipe	Wipe	Wipe	Wipe	Wipe
Color:	Wh/Blk	Wh/Blk	Blk	Blk	Wh/Bm
Texture:	Mixed	Mixed	Mixed	Mixed	Mixed
Sample Treatment:	None	None	None	None	None
Asbestos Present: (Type & Percent)	ND	ND	ND	ND	ND
Total Percent Asbestos:	0%	0%	0%	0%	0%
Other Fibr. Mat. (Type & Percent):	<1%CELL 3%SYNTH	<1%CELL 5%SYNTH	3%CELL 2%SYNTH	5%CELL 2%SYNTH	3%CELL 5%SYNTH
Non Fibr. Mat. (Percent):	96%	94%	95%	93%	92%
Date Received:	4/19/02				
Date of Analysis:	4/22/02				
Date of Report:	4/22/02				

Analyst:

Roody Louis

Lab Manager:

David Chen

- * Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)
- * Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)
- * PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing
- * Samples will be stored for ninety (90) days and then returned to the client upon request
- * The results relate only to the items calibrated or tested.
- * The certificate of report shall not be reproduced without the written approval of the laboratory.
- * The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# :	6	8	9	10	11
Lab Sample ID# :	020419A-1649	020419A-1650	020419A-1651	020419A-1652	020419A-1653
Sample Location:	Bldg. Façade Broad Street Side	Bldg. Façade Broad Street Side	Bldg. Façade Water Street Side	Bldg. Façade Water Street Side	105 Broad Street Ent. Door
Homogeneity:	Yes	Yes	Yes	Yes	Yes
Sample Description:	Wipe	Wipe	Wipe	Wipe	Wipe
Color:	Wh	Wh/Br	Wh/Blk	Wh	Wh
Texture:	Mixed	Mixed	Mixed	Mixed	Mixed
Sample Treatment:	None	None	None	None	None
Asbestos Present: (Type & Percent)	ND	ND	ND	ND	ND
Total Percent Asbestos:	0%	0%	0%	0%	0%
Other Fibr. Mat. (Type & Percent):	30%SYNTH	5%SYNTH	<1%FBGL <1%CELL	3%SYNTH	5%SYNTH
Non Fibr. Mat. (Percent):	70%	95%	98%	97%	95%
Date Received:	4/19/02				
Date of Analysis:	4/22/02				
Date of Report:	4/22/02				

Analyst: R. Louis

Roody Louis

Lab Manager: D.C.

David Chen

- * Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)
- * Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)
- * PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing
- * Samples will be stored for ninety (90) days and then returned to the client upon request
- * The results relate only to the items calibrated or tested.
- * The certificate of report shall not be reproduced without the written approval of the laboratory.
- * The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1997
Fax: (718) 729-1876

BULK SAMPLE ANALYSIS REPORT

CLIENT: GPS Environmental Consultants, Inc., 31 Trescott Path, Fort Salonga, New York, 11768

BUILDING ADDRESS: 105 Broad Street, Manhattan, New York - Building Façade

PROJECT#:

Client Sample ID# : 12

Lab Sample ID# : 020419A-1654

Sample Location: Water Street
Entrance
Door

Homogeneity: Yes

Sample Description: Wipe

Color: Wh

Texture: Mixed

Sample Treatment: None

Asbestos Present:
(Type & Percent) ND

Total Percent
Asbestos: 0%

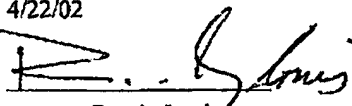
Other Fibr. Mat.
(Type & Percent): <1%FBGL
5%SYNTH

Non Fibr. Mat.
(Percent): 94%

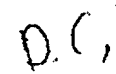
Date Received: 4/19/02

Date of Analysis: 4/22/02

Date of Report: 4/22/02

Analyst: 

Roody Louis

Lab Manager: 

David Chen

* Analysis of samples is performed by Polarized Light Microscopy (PLM) - Point Counting Method (EPA 600/M4-82-020)

* Analytical equipments: Stereobinocular microscope (MEIJI EMT-Serial # 25930), Polarized Light Microscope (MEIJI ML-POL-Serial # 88034)

* PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing

* Samples will be stored for ninety (90) days and then returned to the client upon request

* The results relate only to the items calibrated or tested.

* The certificate of report shall not be reproduced without the written approval of the laboratory.

* The report must not be used by the client to claim endorsement by NVLAP or any agency of the US Government.

NYS-DOH ELAP # 11273

NIST-NVLAP # 102047

AIHA #: 100269

MAY-13-2002 04:13P FROM:

TO: 12124220184

P:5/6



KAM CONSULTANTS
35-40 36th Street
Long Island City
New York, 11106
Tel: (718) 729-1897
Fax: (718) 729-1876

Analytical Report
RCRA Metal Analysis by SW-846 Methods

Client Name: GPS Environmental Consultants, Inc.
31 Trescott Path, Fort Salonga, NY 11768

Date Sampled: 4/19/02
Date Received: 4/22/02
Date Analyzed: 04/23-24/02
Date Reported: 4/25/02

Project Name: 105 Broad Street, Manhattan, New York

Sample ID#: 7

Matrix: Wipe

KAM Lab ID#: C020422A

Analyte	SW-846 Method	MDL	Result
Pb	3050B/7420	5 µg/wp	15.59 µg/wp
Ag	3050B/7760	1 µg/wp	<1 µg/wp
Ni	3050B/7520	2 µg/wp	<2 µg/wp
Cr	3050B/7190	2.5 µg/wp	<2.5 µg/wp
Cd	3050B/7130	1 µg/wp	2.17 µg/wp
Ba	3050B/7080A	15 µg/wp	19.95 µg/wp
Hg	7471A	0.01 µg/wp	0.04 µg/wp

Analyst: Mei Liu

Mei Liu

Lab Manager: David Chen

David Chen

NYS ELAP ID# 11273

Sylvan Lawrence Company, Inc.

SUITE 1600 • 1350 AVENUE OF THE AMERICAS • NEW YORK, N.Y. 10019-4702

7001 2510 0008 4052 8249



CERTIFIED MAIL

Mr. R. Radhakrisnan, P.E.
 Director, Asbestos Control Program
 Department of Environmental Protection
 59-17 Junction Boulevard
 Flushing, NY 11373-5108

CERTIFIED MAIL R.R.R.

11373-5108 2A

