

WSA MANAGEMENT, LTD.

100 Ring Road West, Suite 101
Garden City, New York 11530
Tel: (516) 248-4920 Fax: (516) 294-8767

Sent via Fedex Overnight
February 22, 2002

City of New York
Department of Environmental Protection
59-17 Junction Boulevard, 8th fl.
Corona, NY 11373-5108

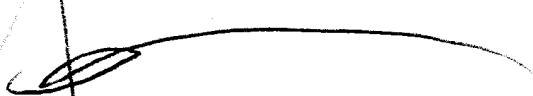
Attention: R. Radhakrishnan, P.E.
Director of Asbestos Control Program

Dear Mr. Radhakrishnan:

Pursuant to your request dated February 16, 2002, enclosed please find a copy of the environmental hazard assessment reports conducted by JLC Environmental Consultants at PII on October 26, 2001, November 16, 2001, November 30, 2001, and December 13, 2001. These are the same reports that were given to Carlstien Lutchmedial, NYC Department of Environmental Protection, Director of Enforcement-Asbestos Control Program, during his visit to 80 John Street, on February 12, 2001.

Please contact me if you have any questions.

Very truly yours,



Fredric Oliver

FO:Emk
enc.

Data/FO/Krishnan



ENVIRONMENTAL CONSULTANTS, INC

October 31, 2001

Mr. Fred Oliver
WSA Management
100 Ring Road West
Garden City, NY 11530

Re: **Ambient Air Monitoring at** PII **New York, NY**

Dear Mr. Oliver:

JLC Environmental Consultants, Inc. (JLC) conducted ambient air sampling for asbestos, lead and Nuisance Dust at the following locations on October 26, 2001.

- 1.
- 2.
- 3.

PII

Asbestos and Lead

The asbestos and lead samples were analyzed using the Phase Contrast Microscopy (PCM) Methodology and the Atomic Absorption Spectrometry Method respectively.

The analytical results of the air samples using both the asbestos (PCM) and Lead (AAS) methods indicated that all samples were under the acceptance criteria of at or below <0.01 fibers per cubic centimeters and below 0.05 mg per cubic centimeters respectively.

Nuisance Dust

The nuisance dust samples were analyzed using the NIOSH 0600 Method and the results indicated that the samples were under the OSHA Permissible Exposure Limit of 5mg per cubic meters.

Based on these results the sampled locations are considered safe for occupancy.

The air sampling and analysis were done utilizing applicable Federal, New York State and New York City Regulations pertaining to asbestos to include Federal OSHA (29 CFR 1926.58 & 1926.62), EPA (NESHAPS 40 CFR Part 61 & 40 CFR Part 745), and TSCA Title II AHERA/ASHARA (40 CFR Part 763) Asbestos Regulations; the New York State Department of Labor Industrial Code Rule 56 and the New York City Department of Environmental Protection Title 15 Asbestos Regulations.

Upon review should you have any questions please feel free to contact me at (212) 420-8119.

Sincerely,
JLC Environmental Consultants, Inc.

A handwritten signature in black ink, appearing to read 'Stephen Pharai', is written over a circular stamp or seal.

Stephen Pharai
Director of Operations

Cc: file: 00-2171 (2 pages)



ENVIRONMENTAL CONSULTANTS, INC

October 30, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PCM Air Sampling Analysis for [PII] New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for air sampling conducted at [PII] New York, NY.

All samples were collected and analyzed by JLC Environmental Consultants, Inc. (JLC) at the request of WSA Management.

After their arrival, samples were individually prepared and tested for airborne fiber content. The detailed protocol for air sample preparation and analysis is discussed in detail in the five sections on the following page: Introduction, Methodology, Analytical Procedures, Phase Contrast Microscopy, and Analytical Results. Any questions concerning results and documentation should also be answered in these sections.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any questions. We hope to be of further assistance in the future.

Sincerely,

JLC Environmental Consultants, Inc.

A handwritten signature in cursive script, appearing to read 'Gulam Machhiwala', is written above the printed name.

Gulam Machhiwala
Laboratory Director
cc: File

WSA Management
JLC Project # 01-2171
October 29, 2001
page 2

Air Sampling Analysis and Procedure

Introduction

Air sampling is defined as the process of measuring the filter content of a known volume of air entrained on a filter membrane over a specified period of time. Each sample is cross-referenced by field designation and a JLC lab internal code to ensure proper, consistent handling through a chain of custody. Sample preparation takes place within an HEPA filter clean bench to avoid any possible contamination.

Methodology

Test procedures for these samples conform to the National Institute of Occupational Safety and Health (NIOSH) standards.

Air sampling was conducted at a level approximating the breathing zone of persons anticipated to be present in the area during normal operations. Samples collected should represent the area's typical airborne fiber concentration.

All samples were collected on fully exposed 25 millimeter, 0.8 micrometer (μm) cellulose ester membrane air sampling cassettes with conductive cowl.

Analytical Procedures

A section of the filter approximating twenty-five percent of the total filter was removed and placed on a pre-cleaned microscope slide and then exposed to approximately 250 microliter (μl) of acetone vapor. A single 3.0 - 3.5 μl drop of triacetin was applied and a clean #1.5 cover slip was placed upon the filter. The prepared slide was then heated on a slide heater until clarity allowed analysis to be conducted.

Analysis was accomplished utilizing a Phase Contrast Microscope in accordance with NIOSH 7400 method, counting rule "A."

Phase Contrast Microscopy

JLC Environmental's laboratory uses an Olympus BH-PC Phase Contrast Microscope, (PCM) equipped with a Walton-Beckett Graticule. Samples were analyzed by first dissolving the filter through a chemical process (described above) and then counting the fibers with PCM at 400x magnification. Phase contrast increases the light contrast between the object and the background, thus enhancing the microscopist's ability to see fibers. Normally, 100 microscopic fields or 100 fibers are counted, whichever occurs first.

Analytical Results

The "Summary of Analytical Results" represents the results of the analysis of the samples. The PCM limit of reliable quantification is less than 0.01 fibers/cubic centimeter (f/cc) of air. If final tests do not meet these requirements, the entire work site must be re-cleaned and re-tested.

JLC ENVIRONMENTAL CONSULTANTS, INC.
 400 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2171
 Analyte: FIBERS
 Date Received: 10/29/01
 Date Analyzed: 10/29/01
 Batch #: 0110A830

SUMMARY OF ANALYTICAL RESULTS

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD	RESULTS(f/cc)
001 26-October A 8408	Ambient/ PII Near Entrance to Bedroom Near Closet	120	1803	5/100	<u>0.001<LOD</u>
002 26-October A 8409	Ambient/ PII East Room/ In the Middle (Column)	120	1803	6/100	<u>0.002</u>
003 26-October A 8410	Ambient/ PII Elevator Hallway on South Side (East Wall)	120	1803	5/100	<u>0.001<LOD</u>
004 26-October A 8411	Ambient/ PII Door Hallway/ Elevator Hallway on North Side (East Wall)	120	1803	4/100	<u>0.001<LOD</u>
005 26-October A 8412	Ambient/ PII West Side Bedroom/ N-Wear Closet	120	1803	7/100	<u>0.002</u>
006 26-October A 8413	Ambient/ PII East Side Bedroom/ North West Near Door	120	1803	6/100	<u>0.002</u>

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

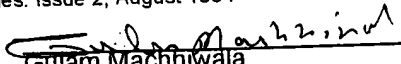
<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
 VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


 Gulam Machhiwala
 Laboratory Director

Report Date: October 30, 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

JLC ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2171
 Analyte: FIBERS
 Date Received: 10/29/01
 Date Analyzed: 10/29/01
 Batch #: 0110A830

SUMMARY OF ANALYTICAL RESULTS

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD	RESULTS(f/cc)
007 26-October A 8414	FIELD BLANK			0/100	
008 26-October A 8415	FIELD BLANK			0/100	

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

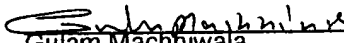
<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
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All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


 Gulam Machhiwala
 Laboratory Director

Report Date: October 30, 2001

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ENVIRONMENTAL CONSULTANTS, INC

October 31, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PII New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for Lead in Air sampling conducted at
PII New York, NY.

All samples were analyzed by JLC Environmental Consultants, using an Atomic Absorption Spectrometer, equipped with an Air-Acetylene flame and background correction in accordance with the NIOSH 7082 Method. The current OSHA Permissible Exposure Limit (PEL) for lead (General Industrial) is 0.05mg/m³ (50ug/m³).

Any questions concerning results and/or documentation should be directed to Gulam Machhiwala, our laboratory director.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any further questions. We look forward to working with you again in the future.

Sincerely,

JLC Environmental Consultants, Inc

A handwritten signature in black ink, appearing to read "Gulam Machhiwala", is written over the printed name.

Gulam Machhiwala
Laboratory Director

cc:File

JLC ENVIRONMENTAL CONSULTANTS INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No. 01-2171
 Analyte: LEAD
 Date Collected: 10/26/01
 Date Received: 10/30/01
 Date Analyzed: 10/30/01
 Lab Batch #: 0110L2167

Site: PII New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
1 18443 01	Ambient/ PII South East Bedroom/ On East Side	240	<16.7
2 18444 02	Ambient/ PII North West Room/ On North Side	240	<16.7
3 18445 03	Ambient/ PII Hallway Elevator/ Hallway on South Side of Hallway	240	<16.7
4 18446 04	Ambient/ PII Hallway Elevator/ Hallway on North Side of Hallway	240	<16.7
5 18447 05	Ambient/ 11th Floor/ PII West Side Bedroom/ North West Near Closet	240	<16.7

Sample Analysis by:

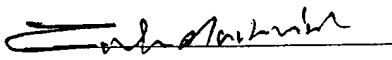
Atomis Absorption Spectrometry (AAS) with an air-acetylene burner
 head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
 February 15, 1984.

Collected By: Mohammed Khan

Analyzed By: Tamara Metelkina



Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

JLC ENVIRONMENTAL CONSULTANTS INC.
 200 F... Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No. 01-2171
 Analyte: LEAD
 Date Collected: 10/26/01
 Date Received: 10/30/01
 Date Analyzed: 10/30/01
 Lab Batch #: 0110L2167

Site: PII, New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
6 18448 06	Ambient/ 11th Floor PII East Side Bedroom/ North West Near Closet	240	<16.7
7 18449 07	FIELD BLANK		<4/ Filter
8 18450 08	FIELD BLANK		<4/ Filter

Sample Analysis by:

Atomis Absorption Spectrometry (AAS) with an air-acetylene burner
 head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
 February 15, 1984.

Collected By: Mohammed Khan
 Analyzed By: Tamara Metelkina



Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.



ENVIRONMENTAL CONSULTANTS, INC

October 30, 2001

Mr. Fred Oliver
WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: Dust Sampling Analysis for [PII] New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for nuisance dust sampling conducted at [PII] New York, NY.

All samples were collected and analyzed by JLC Environmental Consultants, Inc. (JLC) at the request of WSA Management.

After their arrival, samples were individually prepared and tested for airborne particulates. When the samples arrived they were prepared by weighting the filters in the environmental balance chamber following the National Institute of Occupational Safety and Health (NIOSH) method 0500.

The samples analyzed were well below the Occupational Safety and Health Administration (OSHA) recommended limit of 15 mg/m³ and the American Conference of Governmental Industrial Hygienist (ACGIH) standards of 10 mg/m³.

JLC appreciates the opportunity to serve you. Please contact us with any further questions at (212) 420-8119. Thank you.

Sincerely,
JLC Environmental Consultants, Inc.


Gulam Machhiwala
Laboratory Director

cc: File: 01-2171

JI ENVIRONMENTAL CONSULTANTS INC.
 200 Avenue South, Suite 1106, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2171
 Analyte: Airborn Particulate
 Date Collected: 10/26/01
 Date Received: 10/26/01
 Date Analyzed: 10/30/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLOD * (mg / m3)	CONCENTRATION (mg / m3)
1 17C-1	Ambient/ PII North East Room/ On North Side of Room	120		1.00
2 17C-2	Ambient/ PII Near Main Entrance/ Left of Closet	120		1.25
3 17C-3	Ambient/ 11th Floor/ Elevator Hallway/ On South Side of Hallway	120		1.25
4 17C-4	Ambient/ 11th Floor/ Elevator Hallway/ On North Side of Hallway	120		0.92
5 17C-5	Ambient/ 11th Floor/ PII West Side Bedroom/ North West near Closet	120		0.50
6 17C-6	Ambient/ 11th Floor/ PII East Side Bedroom/ North West Side Near Door	120		0.67
7 17C-7	FIELD BLANK			<0.1/ mg/Filter

Sample Analysis by:
 Analytical Balance

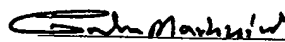
* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.



Gulam Machhiwala
 Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

JL ENVIRONMENTAL CONSULTANTS INC.
200 Avenue South, Suite 1106, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2171
Analyte: Airborn Particulate
Date Collected: 10/26/01
Date Received: 10/26/01
Date Analyzed: 10/30/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLD * (mg / m3)	CONCENTRATION (mg / m3)
8 17C-8	FIELD BLANK			<0.1/ mg/Filter

Sample Analysis by:
Analytical Balance

* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.


Gulam Machhiwala
Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3



ENVIRONMENTAL CONSULTANTS, INC

November 19, 2001

Mr. Fred Oliver
WSA Management
100 Ring Road West
Garden City, NY 11530

Re: Ambient Air Monitoring at PII New York, NY

Dear Mr. Oliver:

JLC Environmental Consultants, Inc. (JLC) conducted ambient air sampling for asbestos and lead at various locations at the above site on November 16, 2001. The asbestos, dust and lead samples were analyzed using the following methodologies:

1. Asbestos : Phase Contrast Microscopy (PCM) Methodology,
2. Dust : NIOSH 0600 (Respirable Dust),
3. Lead : Atomic Absorption Spectrometry Method.

The analytical results of the air samples using the Asbestos (PCM), Respirable Dust and Lead (AAS) methods indicated that all samples passed the acceptance criteria which are as follows:

Asbestos : Acceptance Criteria 0.01 fibers per cubic centimeters,
Dust : 5 milligrams per cubic meter, and
Lead : 50 micrograms per cubic meter.

Based on these results the sampled locations are considered safe for occupancy.

The air sampling and analysis were done utilizing applicable Federal, New York State and New York City Regulations pertaining to asbestos to include Federal OSHA (29 CFR 1926.58 & 1926.62), EPA (NESHAPS 40 CFR Part 61 & 40 CFR Part 745), and TSCA Title II AHERA/ASHARA (40 CFR Part 763) Asbestos Regulations; the New York State Department of Labor Industrial Code Rule 56 and the New York City Department of Environmental Protection Title 15 Asbestos Regulations.

Upon review should you have any questions please feel free to contact me at (212) 420-8119.

Sincerely,
JLC Environmental Consultants, Inc.

A handwritten signature in black ink, appearing to read 'Stephen Pharai', is written over a circular stamp or seal.

Stephen Pharai
Director of Operations

Cc: file: 00-2214



ENVIRONMENTAL CONSULTANTS, INC

November 16, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PCM Air Sampling Analysis for [PII] New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for air sampling conducted at [PII] New York, NY.

All samples were collected and analyzed by JLC Environmental Consultants, Inc. (JLC) at the request of WSA Management.

After their arrival, samples were individually prepared and tested for airborne fiber content. The detailed protocol for air sample preparation and analysis is discussed in detail in the five sections on the following page: Introduction, Methodology, Analytical Procedures, Phase Contrast Microscopy, and Analytical Results. Any questions concerning results and documentation should also be answered in these sections.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any questions. We hope to be of further assistance in the future.

Sincerely,

JLC Environmental Consultants, Inc.

A handwritten signature in cursive script, appearing to read "Gulam Machhiwala", is written above the printed name.

Gulam Machhiwala
Laboratory Director
cc: File

WSA Management
JLC Project # 01-2214
November 16, 2001
page 2

Air Sampling Analysis and Procedure

Introduction

Air sampling is defined as the process of measuring the filter content of a known volume of air entrained on a filter membrane over a specified period of time. Each sample is cross-referenced by field designation and a JLC lab internal code to ensure proper, consistent handling through a chain of custody. Sample preparation takes place within an HEPA filter clean bench to avoid any possible contamination.

Methodology

Test procedures for these samples conform to the National Institute of Occupational Safety and Health (NIOSH) standards.

Air sampling was conducted at a level approximating the breathing zone of persons anticipated to be present in the area during normal operations. Samples collected should represent the area's typical airborne fiber concentration.

All samples were collected on fully exposed 25 millimeter, 0.8 micrometer (μm) cellulose ester membrane air sampling cassettes with conductive cowl.

Analytical Procedures

A section of the filter approximating twenty-five percent of the total filter was removed and placed on a pre-cleaned microscope slide and then exposed to approximately 250 microliter (μl) of acetone vapor. A single 3.0 - 3.5 μl drop of triacetin was applied and a clean #1.5 cover slip was placed upon the filter. The prepared slide was then heated on a slide heater until clarity allowed analysis to be conducted.

Analysis was accomplished utilizing a Phase Contrast Microscope in accordance with NIOSH 7400 method, counting rule "A."

Phase Contrast Microscopy

JLC Environmental's laboratory uses an Olympus BH-PC Phase Contrast Microscope, (PCM) equipped with a Walton-Beckett Graticule. Samples were analyzed by first dissolving the filter through a chemical process (described above) and then counting the fibers with PCM at 400x magnification. Phase contrast increases the light contrast between the object and the background, thus enhancing the microscopist's ability to see fibers. Normally, 100 microscopic fields or 100 fibers are counted, whichever occurs first.

Analytical Results

The "Summary of Analytical Results" represents the results of the analysis of the samples. The PCM limit of reliable quantification is less than 0.01 fibers/cubic centimeter (f/cc) of air. If final tests do not meet these requirements, the entire work site must be re-cleaned and re-tested.

J.C. ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2214
 Analyte: FIBERS
 Date Received: 11/16/01
 Date Analyzed: 11/16/01
 Batch #: 0111A914

SUMMARY OF ANALYTICAL RESULTS

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD	RESULTS(f/cc)
001 16-November A 9202	Ambient/ 8th Floor/ PII South Section/ Bedroom Door (On West)	90	1352.7	11/100	<u>0.004</u>
002 16-November A 9203	Ambient/ 8th Floor/ Apartment PII North Section/ Living Room/ North West Door	90	1352.7	12/100	<u>0.004</u>
003 16-November A 9204	Ambient/ 8th Floor/ Corridor/ North End of Corridor/ North Wall	90	1352.7	7/100	<u>0.003</u>
004 16-November A 9205	Ambient/ 8th Floor/ Corridor/ South End of Corridor/ South Wall	90	1352.7	6/100	<u>0.002</u>
005 16-November A 9206	Ambient/ 22nd Floor/ Apartment PII South Side/ Living Room in the Middle of South Wall	90	1352.7	7/100	<u>0.003</u>
006 16-November A 9207	Ambient/ 22nd Floor/ Apartment PII North East Bedroom/ On West Side Near Door	90	1352.7	6/100	<u>0.002</u>

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
 VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


 Gulam Machhiwala
 Laboratory Director

Report Date: November 16,
 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

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 Garden City, NY 11530

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 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2214
 Analyte: FIBERS
 Date Received: 11/16/01
 Date Analyzed: 11/16/01
 Batch #: 0111A914

SUMMARY OF ANALYTICAL RESULTS

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD RESULTS(f/cc)
007 16-November A 9208	FIELD BLANK			0/100
008 16-November A 9209	FIELD BLANK			0/100

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).

<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
 VOID2 = Overloaded


 Gulam Machhiwala
 Laboratory Director

Report Date: November 16,
 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.



ENVIRONMENTAL CONSULTANTS, INC

November 16, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: [PII] New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for Lead in Air sampling conducted at
[PII] New York, NY.

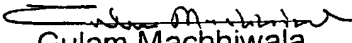
All samples were analyzed by JLC Environmental Consultants, using an Atomic Absorption Spectrometer, equipped with an Air-Acetylene flame and background correction in accordance with the NIOSH 7082 Method. The current OSHA Permissible Exposure Limit (PEL) for lead (General Industrial) is 0.05mg/m³ (50ug/m³).

Any questions concerning results and/or documentation should be directed to Gulam Machhiwala, our laboratory director.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any further questions. We look forward to working with you again in the future.

Sincerely,

JLC Environmental Consultants, Inc


Gulam Machhiwala
Laboratory Director

cc:File

J ENVIRONMENTAL CONSULTANTS INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No. 01-2214
 Analyte: LEAD
 Date Collected: 11/16/01
 Date Received: 11/16/01
 Date Analyzed: 11/16/01
 Lab Batch #: 0111L2213

Site:

PII New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
1 18993 01	Ambient/ 8th Floor/ Apartment PII South Section/ Bedroom Door (On West)	240	<16.6
2 18994 02	Ambient/ 8th Floor/ Apartment PII North Section/ Living Room/ North West Door	240	<16.6
3 18995 03	Ambient/ 8th Floor/ Corridor/ North End of Corridor/ North Wall	240	<16.6
4 18996 04	Ambient/ 8th Floor/ Corridor/ South End of Corridor/ South Wall	240	<16.6
5 18997 05	Ambient/ 22nd Floor/ Apartment PII South Side Living Room/ In the Middle of South Wall	240	<16.6

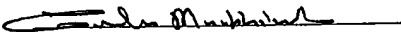
Sample Analysis by:

Atomis Absorption Spectrometry (AAS) with an air-acetylene burner
 head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
 February 15, 1984.

Collected By: Mohammad Khan
 Analyzed By: Marina Solovieva


 Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3
 OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

J ENVIRONMENTAL CONSULTANTS INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No. 01-2214
 Analyte: LEAD
 Date Collected: 11/16/01
 Date Received: 11/16/01
 Date Analyzed: 11/16/01
 Lab Batch #: 0111L2213

Site:

PII

New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
6 18998 06	Ambient/ 22nd Floor/ Apartment PII North West Room/ On West Side Near Door	240	<16.6
7 18999 07	FIELD BLANK		<4/ Filter
8 19000 08	FIELD BLANK		<4/ Filter

Sample Analysis by:

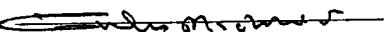
Atomis Absorption Spectrometry (AAS) with an air-acetylene burner
 head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
 February 15, 1984.

Collected By: Mohammad Khan

Analyzed By: Marina Solovieva


 Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3
 OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1106, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2214
 Analyte: Airborn Particulate
 Date Collected: 11/16/01
 Date Received: 11/16/01
 Date Analyzed: 11/16/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLOD * (mg / m3)	CONCENTRATION (mg / m3)
1 1116-01	Ambient/ 8th Floor/ Apartment PII South Section/ Bedroom Door (On West)	120		0.58
2 1116-02	Ambient/ 8th Floor/ Apartment PII North Section/ Living Room/ North West Door	120		0.42
3 1116-03	Ambient/ 8th Floor/ Corridor/ North End of Corridor with North Wall	120		0.92
4 1116-04	Ambient/ 8th Floor/ Corridor/ South End of Corridor with South Wall	120		0.75
5 1116-05	Ambient/ 22nd Floor/ Apartment PII South Side Living Room/ In the Middle of South Wall	120		0.50
6 1116-06	Ambient/ 22nd Floor/ Apartment PII North East Room/ On West Side Near Door	120		0.08
7 1116-07	FIELD BLANK			<0.01/ Filter

Sample Analysis by:
 Analytical Balance

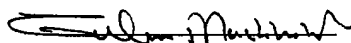
* PL0D = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.



Gulam Machhiwala
 Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

ENVIRONMENTAL CONSULTA. INC.
200 Avenue South, Suite 1106, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2214
Analyte: Airborn Particulate
Date Collected: 11/16/01
Date Received: 11/16/01
Date Analyzed: 11/16/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE #	LOCATION / DESCRIPTION	VOLUME	PLOD * (mg / m3)	CONCENTRATION (mg / m3)
LAB #				
8 1116-08	FIELD BLANK			<0.01/ Filter

Sample Analysis by:
Analytical Balance

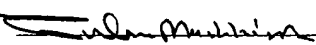
* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.


Gulam Machhiwala
Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

DEC. 3.2001 12:05PM

JLC ENVIRONMENTAL

NO.157 P.2



ENVIRONMENTAL CONSULTANTS, INC

December 3, 2001

Mr. Frederic Oliver
WSA Management
100 Ring Road West
Garden City, NV 11530

Re: Results for Ambient Air Monitoring conducted at PII New York, NY

Dear Mr. Oliver:

JLC Environmental Consultants, Inc. (JLC) conducted ambient air sampling for asbestos and lead in Apartments PII and 5th Floor Tenant Corridor at the above referenced location on November 30, 2001. The asbestos, dust and lead samples were analyzed using the following methodologies:

1. Asbestos : Phase Contrast Microscopy (PCM) Methodology,
2. Dust : NIOSH 0600 (Respirable Dust),
3. Lead : Atomic Absorption Spectrometry Method.

The analytical results of the air samples using the Asbestos (PCM), Respirable Dust and Lead (AAS) methods indicated that all samples passed the acceptance criteria which are as follows:

Asbestos : Acceptance Criteria 0.01 fibers per cubic centimeters,
Dust : 5 milligrams per cubic meter, and
Lead : 50 micrograms per cubic meter.

Based on these results the sampled locations are considered safe for occupancy.

The air sampling and analysis were done utilizing applicable Federal, New York State and New York City Regulations pertaining to asbestos to include Federal OSHA (29 CFR 1926.58 & 1926.62), EPA (NESHAPS 40 CFR Part 61 & 40 CFR Part 745), and TSCA Title II AHERA/ASHARA (40 CFR Part 763) Asbestos Regulations; the New York State Department of Labor Industrial Code Rule 56 and the New York City Department of Environmental Protection Title 15 Asbestos Regulations.

DEC. 3. 2001 12:06PM JLC ENVIRONMENTAL

NO. 157 P. 3

December 3, 2001

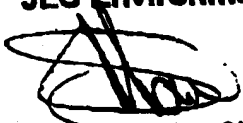
WSA Management

Re: Results for Ambient Air Monitoring conducted at 80 John Street, New York, NY

Upon review should you have any questions please feel free to contact me at (212) 420-8119.

Sincerely,

JLC Environmental Consultants, Inc.



Stephen Pharaï
Director of Operations

Cc: file: 00-2222

DEC. 3.2001 12:06PM

JLC ENVIRONMENTAL

NO.157 P.4



ENVIRONMENTAL CONSULTANTS, INC

December 3, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PII New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for Lead in Air sampling conducted at
PII New York, NY.

All samples were analyzed by JLC Environmental Consultants, using an Atomic Absorption Spectrometer, equipped with an Air-Acetylene flame and background correction in accordance with the NIOSH 7082 Method. The current OHSA Permissible Exposure Limit (PEL) for lead (General Industrial) is 0.05mg/m³ (50ug/m³).

Any questions concerning results and/or documentation should be directed to Gulam Machhiwala, our laboratory director.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any further questions. We look forward to working with you again in the future.

Sincerely,

JLC Environmental Consultants, Inc

A handwritten signature in dark ink, reading "Gulam Machhiwala". To the right of the signature is a small, stylized circular mark or stamp.

Gulam Machhiwala
Laboratory Director

cc:File

DEC. 3.2001 12:06PM

JLC ENVIRONMENTAL

NO.157

P.5

JLC ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-8082

WSA Management

100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029

NIOSH and AIHA Lab Code: 100273

NVLAP Lab Code: 101953

Project No.

01-2222

Analyte:

LEAD

Date Collected:

11/30/01

Date Received:

11/30/01

Date Analyzed:

12/3/01

Lab Batch #:

0111L2254

Site:

PII, New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
1 19339 01	Ambient/ Outside/ Apartment PII North Bedroom/ With Door on Right	240	<16.6
2 19340 02	Ambient/ South East Bedroom/ Entrance Door on Right/ Apartment PII	240	<16.6
3 19341 03	Ambient/ Corridor/ 5th Floor/ South End of the Corridor with Wall	240	<16.6
4 19342 04	Ambient/ Corridor/ 5th Floor/ North End of the Corridor with Wall	240	<16.6
5 19343 05	Ambient/ 7th Floor/ Apartment PII North Bedroom/ Entrance Door on Right	240	<16.6

Sample Analysis by:

Atomic Absorption Spectrometry (AAS) with an air-acetylene burner
 head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis:

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
 February 15, 1984.

Collected By: Mohammad Khan

Analyzed By: Tamara Metelkina



Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

DEC. 3.2001 12:06PM

JLC ENVIRONMENTAL

NO.157

P.6

JLC ENVIRONMENTAL CONSULTANTS, INC.
200 Park Avenue South, Suite 1001, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management

100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029

NIOSH and AIHA Lab Code: 100273

NVLAP Lab Code: 101953

Project No. 01-2222

Analyte: LEAD

Date Collected: 11/30/01

Date Received: 11/30/01

Date Analyzed: 12/3/01

Lab Batch #: 01112254

Site:

PII, New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
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6 19344 06	Ambient/ 7th Floor/ Apartment PII South East Bedroom/ Entrance Door on Right	240	<16.6
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7 19345 07	FIELD BLANK		<4/ Filter
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8 19346 08	FIELD BLANK		<4/ Filter
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Sample Analysis by:

Atomic Absorption Spectrometry (AAS) with an air-acetylene burner
head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
February 15, 1984.

Collected By: Mohammad Khan

Analyzed By: Tamara Metelkina



Gulam Machhiwala
Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

DEC. 3.2001 12:07PM

JLC ENVIRONMENTAL

NO.157 P.7



ENVIRONMENTAL CONSULTANTS, INC

December 3, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PCM Air Sampling Analysis for **PII** New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for air sampling conducted at **PII** New York, NY.

All samples were collected and analyzed by JLC Environmental Consultants, Inc. (JLC) at the request of WSA Management.

After their arrival, samples were individually prepared and tested for airborne fiber content. The detailed protocol for air sample preparation and analysis is discussed in detail in the five sections on the following page: Introduction, Methodology, Analytical Procedures, Phase Contrast Microscopy, and Analytical Results. Any questions concerning results and documentation should also be answered in these sections.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any questions. We hope to be of further assistance in the future.

Sincerely,

JLC Environmental Consultants, Inc.

A handwritten signature in dark ink, reading "Gulam Machhiwala" followed by a stylized flourish.

Gulam Machhiwala
Laboratory Director
cc: File

WSA Management
JLC Project # 01-2222
December 3, 2001
page 2

Air Sampling Analysis and Procedure

Introduction

Air sampling is defined as the process of measuring the filter content of a known volume of air entrained on a filter membrane over a specified period of time. Each sample is cross-referenced by field designation and a JLC lab internal code to ensure proper, consistent handling through a chain of custody. Sample preparation takes place within an HEPA filter clean bench to avoid any possible contamination.

Methodology

Test procedures for these samples conform to the National Institute of Occupational Safety and Health (NIOSH) standards.

Air sampling was conducted at a level approximating the breathing zone of persons anticipated to be present in the area during normal operations. Samples collected should represent the area's typical airborne fiber concentration.

All samples were collected on fully exposed 25 millimeter, 0.8 micrometer (μm) cellulose ester membrane air sampling cassettes with conductive cowl.

Analytical Procedures

A section of the filter approximating twenty-five percent of the total filter was removed and placed on a pre-cleaned microscope slide and then exposed to approximately 250 microliter (μl) of acetone vapor. A single 3.0 - 3.5 μl drop of triacetin was applied and a clean #1.5 cover slip was placed upon the filter. The prepared slide was then heated on a slide heater until clarity allowed analysis to be conducted.

Analysis was accomplished utilizing a Phase Contrast Microscope in accordance with NIOSH 7400 method, counting rule "A."

Phase Contrast Microscopy

JLC Environmental's laboratory uses an Olympus BH-PC Phase Contrast Microscope, (PCM) equipped with a Walton-Beckett Graticule. Samples were analyzed by first dissolving the filter through a chemical process (described above) and then counting the fibers with PCM at 400x magnification. Phase contrast increases the light contrast between the object and the background, thus enhancing the microscopist's ability to see fibers. Normally, 100 microscopic fields or 100 fibers are counted, whichever occurs first.

Analytical Results

The "Summary of Analytical Results" represents the results of the analysis of the samples. The PCM limit of reliable quantification is less than 0.01 fibers/cubic centimeter (f/cc) of air. If final tests do not meet these requirements, the entire work site must be re-cleaned and re-tested.

DEC. 3.2001 12:08PM

JLC ENVIRONMENTAL

NO. 157

P. 9

JLC ENVIRONMENTAL CONSULTANTS, INC.

200 Park Avenue South, Suite 1001, New York, New York 10003

Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2222
Analyte: FIBERS
Date Received: 11/30/01
Date Analyzed: 11/30/01
Batch #: 0111A391

SUMMARY OF ANALYTICAL RESULTS

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD	RESULTS(f/cc)
001 30-November A 9443	Ambient/ Outside/ Apartment PII North Bedroom/ With Door on Right	120	1803.6	5/100	<u>0.001</u>
002 30-November A 9444	Ambient/ South East Bedroom/ Entrance Door on Right/ Apartment PII	120	1803.6	4/100	<u>0.001</u>
003 30-November A 9445	Ambient/ Corridor/ 5th Floor/ South End of the Corridor with Wall	90	1352.7	6/100	<u>0.002</u>
004 30-November A 9446	Ambient/ Corridor/ 5th Floor/ North End of the Corridor with Wall	90	1352.7	5/100	<u>0.002</u>
005 30-November A 9447	Ambient/ 7th Floor/ Apartment PII North Bedroom/ Near Entrance Door on Right	90	1352.7	3/100	<u>0.001</u>
006 30-November A 9448	Ambient/ 7th Floor/ Apartment PII South East Bedroom/ Entrance Door on Right	90	1352.7	5/100	<u>0.001</u>

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
VOID1 = H.C.P. (High Concentration of Particles)
VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules, Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).

Gulam Machhiwala
Gulam Machhiwala
Laboratory Director

Report Date: December 3, 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

DEC. 3.2001 12:08PM

JLC ENVIRONMENTAL

NO.157

P.10

JLC ENVIRONMENTAL CONSULTANTS, INC.
200 Park Avenue South, Suite 1001, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2222
Analyte: FIBERS
Date Received: 11/30/01
Date Analyzed: 11/30/01
Batch #: 0111A931

SUMMARY OF ANALYTICAL RESULTS

Site:

PII

New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD RESULTS(f/cc)
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007 30-November A 9449	FIELD BLANK			0/100
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008 30-November A 9450	FIELD BLANK			0/100
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Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

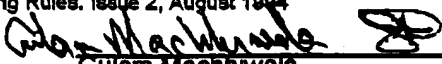
<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
VOID1 = H.C.P. (High Concentration of Particles)
VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus FCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


Gulam Machhiwala
Laboratory Director

Report Date: December 3, 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

DEC. 3.2001 12:08PM

JLC ENVIRONMENTAL
JLC ENVIRONMENTAL CONSULTANTS INC.
 200 Park Avenue South, Suite 1106, New York, New York, 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

NO. 157 P. 11

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2222
 Analyte: Airborn Particulate
 Date Collected: 11/30/01
 Date Received: 11/30/01
 Date Analyzed: 11/30/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLD* (mg / m3)	CONCENTRATION (mg / m3)
1 2222-01	Ambient/ Outside/ Apartment PII North Bedroom/ With Door on Right	120		0.67
2 2222-02	Ambient/ South East Bedroom/ Apartment PII Entrance Door on Right	120		0.50
3 2222-03	Ambient/ Corridor/ 5th Floor/ South End of the Corridor with Wall	120		0.92
4 2222-04	Ambient/ Corridor/ 5th Floor/ North End of Corridor with Wall	120		0.75
5 2222-05	Ambient/ 7th Floor/Apartment PII North Bedroom/ Entrance Door Right	120		0.83
6 2222-06	Ambient/ 7th Floor/Apartment PII South East Bedroom/ Entrance Door on Right	120		0.58
7 2222-07	FIELD BLANK			<0.01 mg/Filter

* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Sample Analysis by:
 Analytical Balance

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.



Gulam Machhiwala
 Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

DEC. 3.2001 12:09PM

JLC ENVIRONMENTAL
JLC ENVIRONMENTAL CONSULTANTS INC.
200 Park Avenue South, Suite 1108, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-8092

NO.157 P.12

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2222
Analyte: Airborn Particulate
Date Collected: 11/30/01
Date Received: 11/30/01
Date Analyzed: 11/30/01

Site: PII New York, NY

Summary of Analytical Results

SAMPLE #	LOCATION / DESCRIPTION	VOLUME	PLOD *	CONCENTRATION
LAB #			(mg / m3)	(mg / m3)
8	FIELD BLANK			<0.01 mg/Filter.
2222-08				

* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Sample Analysis by:
Analytical Balance

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.



Gulam Machhiwala
Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

DEC. 14. 2001 12:36PM

JLC ENVIRONMENTAL

NO. 449

P. 2



ENVIRONMENTAL CONSULTANTS, INC

December 14, 2001

Mr. Frederic Oliver
WSA Management
100 Ring Road West
Garden City, NY 11530

Re: Results for Ambient Air Monitoring conducted at PII New York, NY

Dear Mr. Oliver:

JLC Environmental Consultants, Inc. (JLC) conducted ambient air sampling for asbestos and lead in Apartments PII, 6th Floor Corridor and 4th Floor Corridor at the above referenced location on December 13, 2001. The asbestos, dust and lead samples were analyzed using the following methodologies:

1. Asbestos : Phase Contrast Microscopy (PCM) Methodology,
2. Dust : NIOSH 0600 (Respirable Dust),
3. Lead : Atomic Absorption Spectrometry Method.

The analytical results of the air samples using the Asbestos (PCM), Respirable Dust and Lead (AAS) methods indicated that all samples passed the acceptance criteria which are as follows:

Asbestos : Acceptance Criteria 0.01 fibers per cubic centimeters,
Dust : 5 milligrams per cubic meter, and
Lead : 50 micrograms per cubic meter.

Based on these results the sampled locations are considered safe for occupancy.

The air sampling and analysis were done utilizing applicable Federal, New York State and New York City Regulations pertaining to asbestos to include Federal OSHA (29 CFR 1926.58 & 1926.62), EPA (NESHAPS 40 CFR Part 61 & 40 CFR Part 745), and TSCA Title II AHERA/ASHARA (40 CFR Part 763) Asbestos Regulations; the New York State Department of Labor Industrial Code Rule 56 and the New York City Department of Environmental Protection Title 15 Asbestos Regulations.

DEC.14.2001 12:37PM JLC ENVIRONMENTAL

NO.449 P.3

December 14, 2001

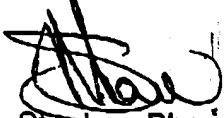
WSA Management

Re: Results for Ambient Air Monitoring conducted at 80 John Street, New York, NY

Upon review should you have any questions please feel free to contact me at (212) 420-8119.

Sincerely,

JLC Environmental Consultants, Inc.



Stephen Pharai

Director of Operations

Cc: file: 01-2240

DEC. 14. 2001 12:37PM

JLC ENVIRONMENTAL

NO. 449 P. 4



ENVIRONMENTAL CONSULTANTS, INC

December 13, 2001.

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PCM Air Sampling Analysis for PII New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for air sampling conducted at 80 John Street, New York, NY.

All samples were collected and analyzed by JLC Environmental Consultants, Inc. (JLC) at the request of WSA Management.

After their arrival, samples were individually prepared and tested for airborne fiber content. The detailed protocol for air sample preparation and analysis is discussed in detail in the five sections on the following page: Introduction, Methodology, Analytical Procedures, Phase Contrast Microscopy, and Analytical Results. Any questions concerning results and documentation should also be answered in these sections.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any questions. We hope to be of further assistance in the future.

Sincerely,

JLC Environmental Consultants, Inc.

A handwritten signature in black ink, appearing to read "Gulam Machhiwala".

Gulam Machhiwala
Laboratory Director
cc: File

WSA Management
JLC Project # 01-2240
December 13, 2001
page 2

Air Sampling Analysis and Procedure

Introduction

Air sampling is defined as the process of measuring the filter content of a known volume of air entrained on a filter membrane over a specified period of time. Each sample is cross-referenced by field designation and a JLC lab internal code to ensure proper, consistent handling through a chain of custody. Sample preparation takes place within an HEPA filter clean bench to avoid any possible contamination.

Methodology

Test procedures for these samples conform to the National Institute of Occupational Safety and Health (NIOSH) standards.

Air sampling was conducted at a level approximating the breathing zone of persons anticipated to be present in the area during normal operations. Samples collected should represent the area's typical airborne fiber concentration.

All samples were collected on fully exposed 25 millimeter, 0.8 micrometer (μm) cellulose ester membrane air sampling cassettes with conductive cowl.

Analytical Procedures

A section of the filter approximating twenty-five percent of the total filter was removed and placed on a pre-cleaned microscope slide and then exposed to approximately 250 microliter (μl) of acetone vapor. A single 3.0 - 3.5 μl drop of triacetin was applied and a clean #1.5 cover slip was placed upon the filter. The prepared slide was then heated on a slide heater until clarity allowed analysis to be conducted.

Analysis was accomplished utilizing a Phase Contrast Microscope in accordance with NIOSH 7400 method, counting rule "A."

Phase Contrast Microscopy

JLC Environmental's laboratory uses an Olympus BH-PC Phase Contrast Microscope, (PCM) equipped with a Walton-Beckett Graticule. Samples were analyzed by first dissolving the filter through a chemical process (described above) and then counting the fibers with PCM at 400x magnification. Phase contrast increases the light contrast between the object and the background, thus enhancing the microscopist's ability to see fibers. Normally, 100 microscopic fields or 100 fibers are counted, whichever occurs first.

Analytical Results

The "Summary of Analytical Results" represents the results of the analysis of the samples. The PCM limit of reliable quantification is less than 0.01 fibers/cubic centimeter (f/cc) of air. If final tests do not meet these requirements, the entire work site must be re-cleaned and re-tested.

DEC. 14. 2001 12:38PM

JLC ENVIRONMENTAL

NO. 449 P. 6

JLC ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2240
 Analyte: FIBERS
 Date Received: 12/13/01
 Date Analyzed: 12/13/01
 Batch #: 0112A870

SUMMARY OF ANALYTICAL RESULTS - PCM

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(mln)	VOLUME(L)	FIB/FIELD	RESULTS(f/cc)
001 13-December A 9864	Ambient/ 4th Floor/ Apartment PII Living Room/ East Wall/ Near Door	90	1352.7	2/100	<u><0.001<LOD</u>
002 13-December A 9865	Ambient/ 4th Floor/ Apartment PII West Bedroom on West/ Near Closet	90	1352.7	2/100	<u><0.001<LOD</u>
003 13-December A 9866	Ambient/ 12th Floor/ Apartment PII North East Bedroom on South/ Near Door	90	1352.7	3/100	<u>0.001<LOD</u>
004 13-December A 9867	Ambient/ 12th Floor/ Apartment PII Living Room/ Kitchen/ Counter South	90	1352.7	2/100	<u><0.001<LOD</u>
005 13-December A 9868	Ambient/ 4th Floor/ Corridor/ South Side With South Wall	90	1352.7	4/100	<u>0.001<LOD</u>
006 13-December A 9869	Ambient/ 4th Floor/ Corridor/ North Side With North Wall	90	1352.7	7/100	<u>0.002</u>

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

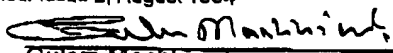
<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
 VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


 Gulam Machhiwala
 Laboratory Director

Report Date: December 13,
 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

DEC. 14. 2001 12:38PM

JLC ENVIRONMENTAL

NO. 449

P. 7

LC ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2240
 Analyte: FIBERS
 Date Received: 12/13/01
 Date Analyzed: 12/13/01
 Batch #: 0112A970

SUMMARY OF ANALYTICAL RESULTS - PCM

Site: PII New York, NY

SAMPLE # COLLECTED LAB #	DESCRIPTION / LOCATION	TIME(min)	VOLUME(L)	FIB/FIELD	RESULTS(/cc)
007 13-December A 9870	Ambient/ 6th Floor/ Corridor/ South Side With South Wall	95	1427.8	2/100	<0.001<LOD
008 13-December A 9871	Ambient/ 6th Floor/ Corridor/ North Side With North Wall	95	1427.8	3/100	0.001<LOD
009 13-December A 9872	FIELD BLANK			0/100	
010 13-December A 9873	FIELD BLANK			0/100	

Sample Analysis by:

Positive Phase Contrast Microscopy (PCM)

<LOD = Less than limit of detection which is 5.5 Fibers/ 100 Fields
 VOID1 = H.C.P. (High Concentration of Particles)
 VOID2 = Overloaded

Method of Sample Preparation and Analysis:

All samples analyzed in accordance with the NIOSH 7400 Method using "A" Counting Rules. Issue 2, August 1994

Instrumentation:

Olympus PCM Model BH-2 with Walton-Beckett Graticule (100um field diameter).


 Gulam Machhiwala
 Laboratory Director

Report Date: December 13,
 2001

JLC is responsible for only the fiber counts within the limitations of the method described as NIOSH 7400. Among other limitations, this method gives only an index of airborne fibers and provides only an estimate of asbestos concentration. Any and all claims arising out of JLC's analysis of these samples are limited in recovery to the cost of analyzing samples. JLC accepts no other liability and the client agrees to seek no costs beyond the above.

DEC. 14. 2001 12:39PM

JLC ENVIRONMENTAL

NO. 449

P. 8

ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1106, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
 100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029
 NIOSH and AIHA Lab Code: 100273
 NVLAP Lab Code: 101953

Project No.: 01-2240
 Analyte: Airborn Particulate
 Date Collected: 12/13/01
 Date Received: 12/13/01
 Date Analyzed: 12/13/01

Site: PII New York, NY

Summary of Analytical Results - Particulates (Dust)

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLOD * (mg / m3)	CONCENTRATION (mg / m3)
01 224001	Ambient/ 4th Floor/ Apartment PII Living Room/ East Wall Near Door	120		1.000
02 224002	Ambient/ 4th Floor/ Apartment PII West Bedroom on West/ Near Closet	120		0.830
03 224003	Ambient/ 4th Floor/ Corridor/ South Side With South Wall	120		0.417
04 224004	Ambient/ 4th Floor/ Corridor/ North Side on North Wall	120		0.100
05 224005	Ambient/ 6th Floor/ Corridor/ South Side on South Wall	120		0.142
06 224006	Ambient/ 6th Floor/ Corridor/ North Side on North Wall	120		0.192
07 224007	Ambient/ 12th Floor/ Apartment PII Living/ Kitchen Counter on South	120		0.912

Sample Analysis by:
 Analytical Balance

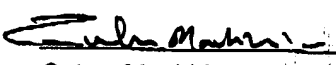
* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.


 Guliam Machhiwala
 Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

DEC. 14. 2001 12:39PM

JLC ENVIRONMENTAL

NO. 449 P. 9

ENVIRONMENTAL CONSULTANTS, INC.
200 Park Avenue South, Suite 1108, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management
100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029
NIOSH and AIHA Lab Code: 100273
NVLAP Lab Code: 101953

Project No.: 01-2240
Analyte: Airborn Particulate
Date Collected: 12/13/01
Date Received: 12/13/01
Date Analyzed: 12/13/01

Site: PII New York, NY

Summary of Analytical Results - Particulates (Dust)

SAMPLE # LAB #	LOCATION / DESCRIPTION	VOLUME	PLOD * (mg / m3)	CONCENTRATION (mg / m3)
08 224008	Ambient/ 12th Floor/ Apartment PII North East Room/ South Wall Near Door	120		1.108
09 224009	FIELD BLANK			<0.01/ mg/ Filter
10 224010	FIELD BLANK			<0.01/ mg/ Filter

Sample Analysis by:
Analytical Balance

* PLOD = Performance limit of detection, which is 0.2 mg/ air volume (l).

Method of Sample Preparation and Analysis

All samples were prepared and analyzed in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 0500 02/15/84.

Instrumentation:

Denver A-200DS, with resolution at 0.01 mg.


Gulam Machhiwala
Laboratory Director

OSHA Permissible Exposure Limit (PEL) for total Nuisance Dust is 5 mg/m3

DEC. 14. 2001 12:39PM

JLC ENVIRONMENTAL

NO. 449 P. 10



ENVIRONMENTAL CONSULTANTS, INC

December 14, 2001

WSA Management
100 Ring Road West
Garden City, NY 11530

Attention: Mr. Fred Oliver

Reference: PII New York, NY

Dear Mr. Oliver:

Enclosed please find the analytical results for Lead in Air sampling conducted at
80 John Street, New York, NY.

All samples were analyzed by JLC Environmental Consultants, using an Atomic Absorption Spectrometer, equipped with an Air-Acetylene flame and background correction in accordance with the NIOSH 7082 Method. The current OSHA Permissible Exposure Limit (PEL) for lead (General Industrial) is 0.05mg/m³ (50ug/m³).

Any questions concerning results and/or documentation should be directed to Gulam Machhiwala, our laboratory director.

JLC Environmental Consultants, Inc. appreciates the opportunity to serve your organization. Please contact us with any further questions. We look forward to working with you again in the future.

Sincerely,

JLC Environmental Consultants, Inc

A handwritten signature in black ink, appearing to read "Gulam Machhiwala", is written over a horizontal line.

Gulam Machhiwala
Laboratory Director

cc:File

DEC. 14. 2001 12:39PM

JLC ENVIRONMENTAL

NO. 449

P. 11

JLC ENVIRONMENTAL CONSULTANTS, INC.
 200 Park Avenue South, Suite 1001, New York, New York 10003
 Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management

100 Ring Road West
 Garden City, NY 11530

ELAP Lab Code: 11029

NIOSH and AIHA Lab Code: 100273

NVLAP Lab Code: 101953

Project No. 01-2240

Analyte: LEAD

Date Collected: 12/13/01

Date Received: 1/13/01

Date Analyzed: 12/14/01

Lab Batch #: 0112L2304

Site:

PII New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
1 19772 01	Ambient/ 4th Floor/ Apartment PII Living Room/ East Wall/ Near Door	240	22.3
2 19773 02	Ambient/ 4th Floor/ Apartment PII West Bedroom on West/ Near Closet	240	<16.6
3 19774 03	Ambient/ 4th Floor/ Corridor/ South Side With South Wall	240	<16.6
4 19775 04	Ambient/ 4th Floor/ Corridor/ North Side With North Wall	240	<16.6
5 19776 05	Ambient/ 6th Floor/ Corridor/ On South Side With South Wall	240	<16.6

Sample Analysis by:

Atomic Absorption Spectrometry (AAS) with an air-acetylene burner head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082, February 15, 1984.

Collected By: Mohammad Khan

Analyzed By: Tamara Metelkina


 Gulam Machhiwala
 Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

DISCLAIMER: JLC Environmental Consultants, Inc. did not collect the analyzed samples and thus accepts no liability with regard to their collection and/or maintenance. JLC relies on the client for all sample information prior to delivery at JLC.

DEC. 14. 2001 12:40PM

JLC ENVIRONMENTAL

NO. 449

P. 12

JLC ENVIRONMENTAL CONSULTANTS, INC.
200 Park Avenue South, Suite 1001, New York, New York 10003
Phone: (212) 420-8119 Fax: (212) 420-6092

WSA Management

100 Ring Road West
Garden City, NY 11530

ELAP Lab Code: 11029

NIOSH and AIHA Lab Code: 100273

NVLAP Lab Code: 101953

Project No. 01-2240
Analyte: LEAD
Date Collected: 12/13/01
Date Received: 1/13/01
Date Analyzed: 12/14/01
Lab Batch #: 0112L2304

Site:

PII New York, NY

SUMMARY OF ANALYTICAL RESULTS - AIR

Sample # Lab # Client's Sample #	Description/ Location	Volume (liter)	Results (ug/m3)
6 19777 06	Ambient/ 6th Floor/ Corridor/ North Side on North Wall	240	<16.6
7 19778 07	Ambient/ 12th Floor/ Apatymnt PII Living/ Kitchen Counter on South	240	<16.6
8 19779 08	Ambient/ 12th Floor/ Apartment PII North East Room/ South Wall Near Door	240	<16.6
9 19780 09	FIELD BLANK		<4/ Filter
10 19781 10	FIELD BLANK		<4/ Filter

Sample Analysis by:

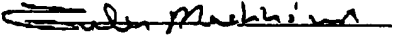
Atom's Absorption Spectrometry (AAS) with an air-acetylene burner
head (Flame) and background correction (AAS-Flame).

Method of Sample Preparation and Analysis

All Samples were prepared and analyzed in accordance with NIOSH Method 7082,
February 15, 1984.

Collected By: Mohammad Khan

Analyzed By: Tamara Metelkina


Gulam Machhiwala
Laboratory Director

Minimum Detection Limit = <4.0 ug/m3

OSHA Permissible Exposure Limit (PEL) for General Industry is 50 ug/m3.

DISCLAIMER: JLC Environmental Consultants, Inc. did not collect the analyzed samples and thus accepts no liability with regard to their collecti
and/or maintenance. JLC relies on the client for all sample information prior to delivery at JLC.