

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

January 25, 2002

Anthony Ponzo
Merrill Lynch
WFC North Tower
250 Vesey Street, NY, NY

**Re: Final Report - Asbestos Cleanup Procedures & Air Sampling Results for the
Cleanup of the WTC disaster - 2 World Financial Center, South Tower**

Tony:

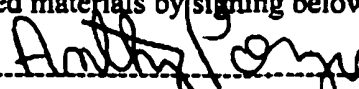
Enclosed herein is the final report for the above referenced project. The building, including all floors has been cleared for re-occupancy in accordance with applicable Federal, State and Local asbestos regulations. (The E-bank elevator is the only exception)

The complete laboratory results with chains of custody and logbook copies are contained in the (8) eight, cardboard file storage containers accompanying this report. All laboratory reports are sorted by date and type; PCM, TEM Post, etc.

For your convenience GPS has provided a CD of laboratory results. These laboratory results have been generated from computerized laboratory files and they are believed to be complete. They are to be viewed only to assist the user in locating the laboratory signed copy contained in the 6 cardboard storage boxes. The information contained on the CD is for read only and may not be copied or printed for reuse.

As requested, GPS has also provided 9 reports for specific floors occupied by tenants. These reports have been prepared by GPS exclusively for their client, Merrill lynch.

Please acknowledge the receipt of the above stated materials by signing below.



Anthony Ponzo, Merrill Lynch

Sincerely Yours,

Gregory P. Smyth
President GPS

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

January 23, 2002

Anthony Ponzo
Merrill Lynch
WFC North Tower
250 Vesey Street, NY, NY

**Re: Nomura Occupied floors 17-22 - Asbestos Cleanup Procedures & Air Sampling
Results for the Cleanup of the WTC disaster - 2 World Financial Center, South
Tower**

Tony:

As requested, enclosed herein is a summary of the cleanup protocols used at the 2 WFC, South Tower.

Due to the complexities of the project it was necessary to divide the cleanup into three phases. Phase I, II & III procedures are described in detail below. Phase I and Phase II procedures described below have been completed for Nomura occupied floors 17-22. All cleanup phases were conducted by trained, certified asbestos handlers and supervisors. GPS Environmental Consultants, Inc., a licensed asbestos consulting firm, monitored work activities and conducted asbestos air sampling during the three phased cleanup procedure. Asbestos air sampling was conducted during the performance of each cleanup phase. Post/Final asbestos air sampling was conducted at the conclusion of each phase. All Post/Final sample analyses results were required to be below 0.01 f/cc for Phase Contrast Microscopy (PCM) analysis and less than 70 Structures/mm² for Transmission Electron Microscopy (TEM) analysis which is acceptable for re-occupancy in accordance with Federal, State and NYC Asbestos regulations.

1A

Bulk Sample Collection and General Cleanup Criteria:

A NYC Investigator collected 15 bulk samples from representative floors on the east side of the facility where windows were broken and bulk/gross debris was observed. The samples were analyzed using the PLM, (polarized light Microscopy) analytical technique. Three Samples on three separate floors had results of asbestos present in amounts greater than 1%. Based on these results all bulk/gross material was treated as asbestos containing material, (ACM). The east side of facility from the street level through floor 22 was most heavily damaged with many broken windows and large amounts of debris. Floor 23 and above exhibited much less damage having fewer broken windows.

The east side of the facility, where windows were broken and gross material entered was separated from the rest of the floor by polyethylene isolation barriers. Negative air machine were installed to assist in controlling fiber release from the east side. Cleanup work on both the east and west side of the facility was performed by a licensed Asbestos Abatement Contractor utilizing certified asbestos handlers and supervisors. GPS Environmental, a licensed Asbestos Air Monitoring firm, performed asbestos air sampling. Sampling was performed during each phase of the cleanup operation and at the conclusion of each phase post/final asbestos air sampling was performed.

Phase I Cleanup Procedure Overview

This was the initial cleanup phase of the project. After the procedures listed below were completed the floor was cleared for occupancy without the use of respiratory protection and other personal protective equipment. Access was limited at this time to essential personnel. Personnel required to complete assessments. Personal items and equipment not disposed of on the eastside was not to be disturbed, handled or removed from the facility until a detailed fine cleaning of these items could be performed, since these items may have been contaminated with asbestos containing material. Personal items, files, etc., located on the west side also suspected of containing dust contaminated with asbestos fibers were scheduled to be fine cleaned as described in the Phase II cleanup procedure overview discussed below.

Eastside cleanup and other heavily impacted areas containing gross debris contaminated with ACM, (asbestos containing materials)

- (1) A modified containment was setup to isolate gross debris containing areas.
- (2) Negative air machines were installed within the containment to help control fiber release,
- (3) Remote decontamination units were erected and used by asbestos abatement personnel.
- (4) 1st cleaning - Gross debris was double bagged and disposal of as asbestos waste.
- (5) 2nd cleaning - the exterior surfaces of all items were HEPA vacuumed and wet wiped.
- (6) All Fabric materials and ceilings were removed and disposed of.
- (7) Personal items were cleaned of gross material and boxed until a decision was made as to disposal or cleaning.
- (8) Equipment was considered contaminated and disposed of or wrapped in poly until direction was given.
- (9) Prior to Post/final asbestos air sampling all areas were visually inspected by GPS personnel and re-cleaned was performed as required.
- (10) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. In accordance with Federal, State and Local asbestos regulations re-occupancy criteria, all post samples were required to be below 0.01 f/cc for PCM analysis and less than 70 Structures/mm² for TEM analysis. If any sample result was at or above these limits then the area

was re-cleaned until all sample results were below these limits. Isolation barriers were removed only after passing this post sampling criteria.

Westside cleanup and other areas containing dust

- (1) 1st cleaning – all surfaces were HEPA vacuumed and wet wiped by asbestos certified handlers and supervisors.
- (2) All areas were inspected by GPS personnel and re-cleaned as necessary.
- (3) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm² for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.

Phase II Final Cleanup Procedure Overview - After the procedures listed below were completed the floor may be reoccupied with no restrictions.

A final, detailed fine cleaning was performed by certified asbestos workers under the direction of a specialized disaster recovery firm. The space walls, floors, furniture and personal items were finely cleaned to remove residual dust. All rugs are shampooed to remove contaminants.

Asbestos Final-clearance air sample collection and analysis

- (1) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, Transmission Electron Microscopy samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm² for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.
- (2) Asbestos wipe sampling was collected from surfaces in representative locations and analyzed for the presence or absence of asbestos using the TEM qualitative analytical technique. To be acceptable all results were required to be reported as absent or negative for asbestos present.

Phase III Procedure Overview – The ventilation ductwork was inspected by a trained HVAC specialist. Areas determined to be contaminated were cleaned by a certified duct cleaning firm. All fresh air and compartmental filters were replaced. Both the upper and lower fresh air fans were turned on after filter replacement, cleaning and inspections were complete. As a measure to ensure a safe environment for all occupants, GPS conducted asbestos air sampling for each floor for a 24-48 hour period.

Asbestos Final-clearance air sample collection and analysis

- (1) **Asbestos air sample collection and analysis**
- a. **PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.**
 - b. **All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm2 for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.**

Tony, approximately 62,000 PCM and 31,000 TEM asbestos samples have been collected and analyzed to date. Post Sampling for Phase III is completed for the upper fresh air bank, floors 17 through the Penthouse and for the lower fresh air bank, floors C3 through 16.

Sincerely Yours,



Gregory P. Smyth
President GPS



facsimile transmittal

To: Carlstein Lutchmedial Fax: 718/5953749
From: Bruce Ehrlich / Tony Ponzio Date: 1/28/02
Re: Clearona Letter-2 WFC Pages: 6
Cleanup & Air Sampling Results
CC: for Nomura Fibers 17-22

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Mr. Lutchmedial:

Attached is the information
you had requested per your visit
on 1/28/02

Bruce Ehrlich for Tony Ponzio

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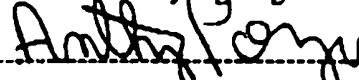
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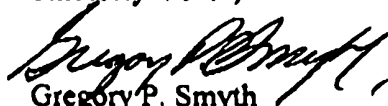
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Sincerely Yours,



Gregory P. Smyth
President GPS

memorandum

MC CLIER

605 Third Avenue
31st Floor
New York, New York 10158
212-973-2912
212-953-0399 fax
www.mcclier.com

Date: 5/14/02
To: Krish Radhakrishnan
NYC/DEP
From: Chris Sexton-McClier
Project: American Express Project
Project No: 01-957
Copies To:
Subject: Washdown of the AMEX Bldg.
3 WFC (200 Vesey)

As per our telephone conversations, we are requesting your review of our application for FEMA funds to finance the washdown (cleaning) of our building.

Your assistance in this matter is greatly appreciated.

Sincerely,
McClier



Chris Sexton
Site Safety Manager

Inspected. - April 15 2002
Bldg is clean.



ENTERED

On April 15, 2002 I met with Chris Sexton of Total Safety Consulting (212) 640-9136 and Michael Handler of Turner Construction 212.786.1480. The purpose of the meeting was to discuss the planned washdown of 1, 2, 3, 4 World Financial Centers. At this time, all the decontamination of the exterior had been completed. Samples had been collected for ACM and were negative.

Their concern was that when the washdown starts they do not violate any of DEP regulations. Water would be trucked in from outside so as to observe water restrictions. This they felt was the right thing to do, even if DEP allowed them to use the pipe borne supply. The washdown is a plain washing to give the entire clean up some finality. It was agreed that some soil sampling would be done where the run off is expected. So as to ensure that no form of contamination get into the sewer system. A review of the ACM sampling done revealed that only 4 samples were collected from each building (total of 16). Most had trace ACM. I requested that more sampling be done as 4 samples are not sufficient to represent the enormity of the buildings. However, they said that samples may be hard to find. In the end it was agreed that more samples would be taken. If the additional samples are negative, then the cleanup can go on as planned. A look at some of the small window ledges revealed that they were free of debris.



TOTAL SAFETY CONSULTING LLC

Site Safety Management • Loss Control Consulting • Accident Investigation • Safety Training • Fire Safety

FAX COVER PAGE

DATE: 5/14/02

TO: OED

ATTN: KRISH RADHA KRISHNA

RE: AMERICAN EXPRESS BLOC. WASHDOWN

FAX #: 718 595-3744

TOTAL PAGES (INCLUDING COVER PAGE): 2

FROM: CHRIS SEXTON

FAX #: 212-640-9223

VOICE #:

PII

NOTE

R.S.V.P. / ASAP PLEASE.

THANKS

Chris Sexton

6 Highland Avenue • Staten Island, NY 10301 • (718) 273-5113



April 17, 2002

Turner Construction Company
375 Hudson Street
New York, New York 10014-3667
phone: 212.229.6000
fax: 212.229.6329

Mr. Carlstien Lutchmedial, Director
Enforcement Asbestos Control Program
New York City Department of Environmental Protection
59-17 Junction Boulevard, 8th Floor
Corona, New York 11368-5107

Dear Mr. Lutchmedial:

Thank you for taking the time to meet with us regarding the façade cleaning at the World Financial Center.

As per our conversation, we are exempt from water restrictions when washing the building down. The results of the bulk sampling of material on the building showed less than 1% of asbestos and the D.E.P. therefore considers this a non-asbestos project. As a non-asbestos project, there is no requirement for collecting the wastewater from the wash down or any special protection.

We have attached copies of the bulk sample result for Towers 1, 2, 3, and 4. As per your suggestion, we will get 5 additional samples for each building for a total of nine (9) each. We will forward the results as they become available.

Very truly yours

TURNER CONSTRUCTION COMPANY

A handwritten signature in black ink, appearing to read "Michael Handler".

Michael Handler
Project Manager

:encl.

Cc: W. Murray, T. Evans, D. Collins (TCCo), G. Gutierrez (McCleir) R. Guam, C. Sexton(TSC), M. Bosso (Brookfield), B. Grant (Merrill Lynch)

**SCIENTIFIC LABORATORIES, INC.**117 EAST 30TH STREET
NEW YORK, NY 10016

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

PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc. Date Received 03/23/2002 SciLab Job No. 202033340
 Attn: Peter Ellams Date Examined 03/23/2002 P.O. # Ellams
 511 6th Ave. ELAP Number 11480 Page 1 of 4
 Suite 353 RE: World Financial Center - Towers A,B,C, and D
 New York, NY 10012

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-01	202033340-01	Yes	<1.0% ^{1,2}

Location: Tower A, 6th Floor - East End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile <1.0 %

Other Material: Animal hair Trace, Cellulose 20. %, Fibrous glass 40. %, Synthetic fibers Trace, Non-fibrous >39. %

WFC-02	202033340-02	Yes	<1.0% ^{1,2}
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Location: Tower A, Mezzanine Level - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile Trace

Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 20. %, Non-fibrous 65. %

WFC-03	202033340-03	Yes	<1.0% ^{1,2}
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Location: Tower A, Mezzanine Level - Southeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile Trace

Other Material: Animal hair 5. %, Cellulose 20. %, Fibrous glass 15. %, Synthetic fibers 5. %, Non-fibrous 55. %

WFC-04	202033340-04	Yes	<1.0% ^{1,2}
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Location: Tower A, Ground Level - Marble Ledge Structure

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile <1.0 %

Other Material: Animal hair Trace, Cellulose 30. %, Fibrous glass 15. %, Synthetic fibers Trace, Non-fibrous >54. %



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NEW YORK, NY 10016

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PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc.	Date Received	03/23/2002	SciLab Job No.	202033340
Attn: Peter Ellams	Date Examined	03/23/2002	P.O. #	Ellams
511 6th Ave.	ELAP Number	11480	Page	2 of 4
Suite 353	RE: World Financial Center - Towers A,B,C, and D			
New York, NY 10012				

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-05	202033340-05	Yes	<1.% ^{1,2}

Location: Tower B, 4th Floor- East Center End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 20. %, Fibrous glass 15. %, Synthetic fibers Trace,
Non-fibrous 65. %

WFC-06	202033340-06	Yes	<1.% ^{1,2}
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Location: Tower B, 4th Floor - Southeast End Corner Structure Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile <1.0 %
Other Material: Cellulose 20. %, Fibrous glass 35. %, Synthetic fibers Trace,
Non-fibrous >44. %

WFC-07	202033340-07	Yes	<1.% ^{1,2}
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Location: Tower B, 3rd Floor - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 20. %, Synthetic fibers Trace, Non-fibrous 65. %

WFC-08	202033340-08	Yes	<1.% ^{1,2}
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Location: Tower B, Mezzanine - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 25. %, Synthetic fibers Trace, Non-fibrous 60. %

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NEW YORK, NY 10016

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PLM Bulk Asbestos Report

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 511 6th Ave. ELAP Number 11480 Page 3 of 4
 Suite 353 RE: World Financial Center - Towers A,B,C, and D
 New York, NY 10012

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-09	202033340-09	No	NAD ²

Location: Tower C, 7th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types:

Other Material: Cellulose 20. %, Fibrous glass 10. %, Non-fibrous 70. %

WFC-10	202033340-10	Yes	<1.0% ^{1, 2}
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Location: Tower C, 7th Floor - Southeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile Trace

Other Material: Cellulose 5. %, Fibrous glass 5. %, Synthetic fibers Trace,
Non-fibrous 90. %

WFC-11	202033340-11	Yes	<1.0% ^{1, 2}
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Location: Tower C, 4th Floor - Southeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile Trace

Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 25. %, Non-fibrous 60. %

WFC-12	202033340-12	Yes	<1.0% ^{1, 2}
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Location: Tower C, 4th Floor - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material

Asbestos Types: Chrysotile <1.0 %

Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 30. %, Synthetic fibers Trace, Non-fibrous >54. %



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511 6th Ave.	ELAP Number	11480	Page 4 of 4	
Suite 353	RE: World Financial Center - Towers A,B,C, and D			
New York, NY 10012				

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-13	202033340-13	Yes	<1.% ^{1,2}

Location: Tower D, 4th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 15. %, Fibrous glass 35. %, Non-fibrous 50. %

WFC-14	202033340-14	Yes	<1.% ^{1,2}
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Location: Tower D, Northeast End Balcony Below Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 10. %, Fibrous glass 20. %, Synthetic fibers Trace, Non-fibrous 70. %

WFC-15	202033340-15	Yes	<1.% ^{1,2}
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Location: Tower D, 4th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 30. %, Synthetic fibers Trace, Non-fibrous 55. %

Reporting Notes:

- (1) PLM analysis by EPA 400 Point Count Method, where Trace = less than 1% by weight (e.g. < 1.0%)
- (2) Composite analysis results for heterogenous debris samples may be highly variable due to inhomogenities in materials present

Analyzed by: Jonathan Teda _____

*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: _____

2/27/02

WTC ROOF SURVEY

Mohan



- ④ The above contacts were for 4 world Financial center.
- ⑥ An appointment was made for this morning 9:30am for roof inspection.
- ⑦ Also an appointment was made with #3 WFC. (Annex Bldg) for 11am this morning - Engineers (212) 640-1220

File 1 copy
in
250 Vesey Pl
and another
in
200 Vesey St.



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Corona, New York
11368-5107

February 8, 2002

WFP TOWER D CO LP
237 PARK AVENUE
NEW YORK, NY 10017

**Joel A. Miele Sr., P.E.
Commissioner**

Subject: 250 VESEY PLACE, MANHATTAN

**Robert C. Avaltroni
Deputy Commissioner**

Dear Sir/ Madam:

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

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

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

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

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

Sincerely,

R. Radhakrishnan, P.E.

Director

Asbestos Control Program



www.nyc.gov/dep

(718) DEP-HELP



**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

February 23, 2002

WFP TOWER D CO LP
237 PARK AVENUE
NEW YORK, NY 10017

Subject: 250 VESEY PLACE
4 World Financial Center
Second Notice

Dear Sir/ Madam:

This is a follow-up to the NYC DEP request for copies of the environmental hazard assessments including bulk sample results and air monitoring results and a summary of clean-up activities at the above referenced site. To date, our office has not received the requested documents and information. They may be faxed to (718) 595-3744 or sent to the NYC DEP Asbestos Control Program at 59-17 Junction Boulevard, 8th floor, Corona, New York 11373-5108.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "R. Radhakrishnan".

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



www.nyc.gov/dep

1-800-DEP-HELP



**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

EL758387287US

February 12, 2002

**WFP TOWER D CO LP
237 PARK AVENUE
NEW YORK, NY 10017**

**Subject: 250 VESEY PLACE
4 World Financial Center**

Dear Sir/ Madam:

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

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

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

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Sincerely,

A handwritten signature in black ink, appearing to read "R. Radhakrishnan".

R. Radhakrishnan, P.E.

Director

Asbestos Control Program



www.nyc.gov/dep

(718) DEP-HELP



facsimile transmittal

To: Carlstein Lutchmedial Fax: 718/5953749
From: Bruce Ehrlich / Tony Pongo Date: 1/28/02
Re: Clearana Letter-2 WFC Pages: 6
Cleanup & Air Sampling Results.
CC: for Nomura Floor 17-22

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Mr. Lutchmedial:

Attached is the information
you had requested per your visit
on 1/28/02

Bruce Ehrlich for Tony Pongo



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Corona, New York
11368-5107

February 12, 2002

Castega-20 Vesey St.
20 Vesey Street
New York, NY 10007-2913

Subject: 20 VESEY STREET

**Joel A. Miele Sr., P.E.
Commissioner**

Dear Sir/ Madam:

**Robert C. Avaltroni
Deputy Commissioner**

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

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

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Sincerely,

A handwritten signature in black ink, appearing to read "R. Radhakrishnan".

R. Radhakrishnan, P.E.

Director

Asbestos Control Program





**Department of
Environmental
Protection**

59-17 Junction Boulevard
Corona, New York
11368-5107

February 8, 2002

CASTEGA 20 VESEY STREET
20 VESEY STREET
NEW YORK, NY 10007

**Joel A. Miele Sr., P.E.
Commissioner**

Subject: 20 VESEY STREET, MANHATTAN

**Robert C. Avaltroni
Deputy Commissioner**

Dear Sir/ Madam:

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

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Sincerely,

R. Radhakrishnan, P.E.

Director

Asbestos Control Program



www.nyc.gov/dep

(718) DEP-HELP

NYC DEP ASBESTOS CONTROL PROGRAM

EMERGENCY ASBESTOS PROJECT NOTIFICATION (15 RCNY Section 1-56)

Written notification must be received within 48 hours via

- a) Asbestos Inspection Report (ACP-7)
- b) Cover letter explaining the nature of the emergency

E 163/01

1) Caller's Name: _____
 Affiliation: Aryc, Lustig, & Sassower
 Telephone #: (678) 393-4621

2) Nature of Emergency: WTC emergency clean-up

3) Actual Date and Time of Emergency _____

4) Method of Asbestos Abatement:

Removal	_____ Sq. ft.	_____ L. ft.	Repair	_____ Sq. ft.	_____ L. Ft
Encapsulation	_____ Sq. ft.	_____ L. ft.	Clean-up	<u>?</u> Sq. ft.	_____ L. ft.
Enclosure	_____ Sq. ft.	_____ L. ft.			

5) Facility Address: 20 Vesey Street, Manhattan
 Owner/Agent: Contact Person _____ Tel. _____
 Location of Asbestos Abatement: 15th flm

6) Asbestos Abatement Contractor:
 Name: Asbestos Containment Services Inc. (ACSI)
 Address: 350 Warren Street, First Flm West, New Jersey
 Telephone #: (201) 946-0080
R. A. West Associates, Inc. (Consultant)

7) Starting Date: 11/30/01 Projected Completion Date: _____

8) Verification by Owner/Agent: Yes.

Call Taken By: P.T.
 Date: 11/21/01

NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION
Asbestos Control Program
59-17 Junction Boulevard, 8th Floor, Corona, NY 11368-5107

File 14264401

Building Dept. or TRU No.
FOR OFFICIAL USE ONLY

ONLY
TYPEWRITTEN
FORMS WILL BE
ACCEPTED



**ASBESTOS PROJECT NOTIFICATION
(ASBESTOS INSPECTION REPORT)**

When submitting this form at the NYC Department of Buildings, the original form and three (3) copies with original signatures are required. Submittal at the NYCDEP requires one copy of the form with original signature. This form must be submitted to the NYC DEP not less than one week in advance of the start of abatement activity.

1. \$200

(See fee schedule)

EMERGENCY
EX 163/01

I. FACILITY

2. Address 20 Vesey Street Borough Manhattan Zip 10007
AKA _____ 3. Block 88 4. Lot 5
5. Type of Facility Commercial Office Space 6. Name of Building 20 Vesey Street

II. BUILDING OWNER

7. Name Cedar Management Corp. 8. Cor _____
9. Tel. # (212) 732-7653 Fax # (212) 962-1825
10. Address 20 Vesey Street City New York

III. GENERAL CONTRACTOR

11. Name N/A

IV. ASBESTOS ABATEMENT CONTRACTOR

12. Name ACSI 13. C _____
14. Federal Employer ID. # PII 15. Tel. # (201) 946-0080
16. Address 350 Warren Street City Jersey City

V. THIRD PARTY AIR MONITOR

17. Name R. A. West Associates, Inc. 18. Contact Person Art Mallett
19. Federal Employer ID. # PII 20. Tel. # (215) 860-5026 Fax # (215) 860-0883
21. Address 2865 South Eagle Road City Newtown State PA Zip 18940
22. Sample Analysis Laboratory Sci Lab 23. NYS DOH ELAP # 11480

VI. PROJECT INFORMATION

24. Starting date for this portion of work 11/30/01 Projected completion date 12/1/01

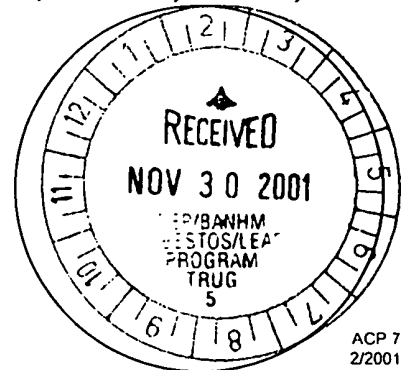
Asbestos work schedule ☐ Monday ☐ Tuesday ☐ Wednesday ☐ Thursday ☒ Friday ☒ Saturday ☐ Sunday

Shift from: 4:00 ☐ am ☒ pm to 12:00 ☒ am ☐ pm

If other, specify _____

Access to inspect the premises must be provided during the work schedule indicated in this item.

25. Total amount of asbestos-containing material to be abated during this work
10 Square Feet, and/or 0 Linear Feet



ACP 7
2/2001

Copies for Krish

NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION

Asbestos Control Program

59-17 Junction Boulevard, 8th Floor, Corona, NY 11368-5107

**ASBESTOS PROJECT NOTIFICATION
(ASBESTOS INSPECTION REPORT)**

TRU 14264401

Building Dept. or TRU No.
FOR OFFICIAL USE ONLY

1. \$200
(See fee schedule)

EMERGENCY
EX 163/01

ONLY
TYPEWRITTEN
FORMS WILL BE
ACCEPTED

NOV 30 2001

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I. FACILITY

2. Address 20 Vesey Street Borough Manhattan Zip 10007
AKA _____ 3. Block 88 4. Lot 5
5. Type of Facility Commercial Office Space 6. Name of Building 20 Vesey Street

II. BUILDING OWNER

7. Name Cedar Management Corp. 8. Contact Person Richard Rubel
9. Tel. # (212) 732-7653 Fax # (212) 962-1825
10. Address 20 Vesey Street City New York State NY Zip 10007

III. GENERAL CONTRACTOR

11. Name N/A Tel. # _____

IV. ASBESTOS ABATEMENT CONTRACTOR

12. Name ACSI 13. Contact Person Art Mallett
14. Federal Employer ID. # PII 15. Tel. # (201) 946-0080 Fax # (201) 946-2337
16. Address 350 Warren Street City Jersey City State NJ Zip 07302

V. THIRD PARTY AIR MONITOR

17. Name R. A. West Associates, Inc. 18. Contact Person Art Mallett
19. Federal Employer ID. # PII 20. Tel. # (215) 860-5026 Fax # (215) 860-0883
21. Address 2865 South Eagle Road City Newtown State PA Zip 18940
22. Sample Analysis Laboratory Sci Lab 23. NYS DOH ELAP # 11480

VI. PROJECT INFORMATION

24. Starting date for this portion of work 11/30/01 Projected completion date 12/1/01

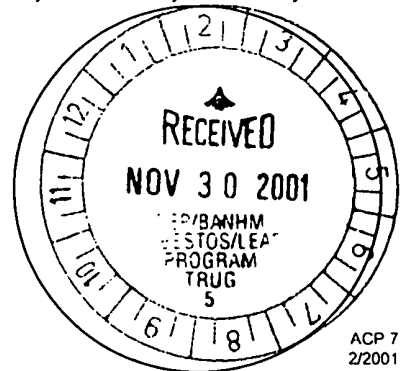
Asbestos work schedule ☐ Monday ☐ Tuesday ☐ Wednesday ☐ Thursday ☒ Friday ☒ Saturday ☐ Sunday

Shift from: 4:00 ☐ am ☒ pm to 12:00 ☒ am ☐ pm

If other, specify _____

Access to inspect the premises must be provided during the work schedule indicated in this item.

25. Total amount of asbestos-containing material to be abated during this work
10 Square Feet, and/or 0 Linear Feet



ACP 7
2/2001

ASBESTOS INSPECTION REPORT (continued)

26. Asbestos Hauler DJM, Inc. NYS DEC Permit # JA-344 Tel.# (201) 656-8889
 Disposal Site(s) Greenidge Reclamation - RD #1 Box 716 Landfill Road Scottsdale, PA 15683

27. This asbestos abatement is part of a (Item a through e requires filing of this form with NYC Department of Buildings)
 a) ☐ Demolition b) ☐ Boiler Replacement c) ☐ Sprinkler Replacement d) ☐ Renovation/Alteration
 e) ☐ Fireproofing Replacement f) ☒ Other (Describe) Emergency Response Cleanup

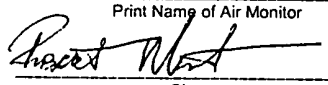
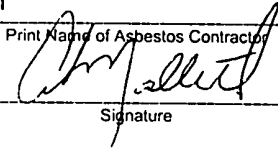
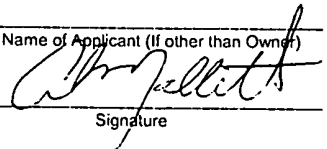
28. TYPE OF ABATEMENT (Check all appropriate boxes)
☐ Removal ☐ Enclosure ☐ Encapsulation ☐ Repair ☒ Clean up

29. ABATEMENT PROCEDURE (Check all appropriate boxes)
☐ Full Containment ☐ Glovebag ☒ Tent ☐ DEP Variance Application

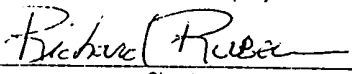
30. LOCATIONS OF ABATEMENT

Floor(s)	DESCRIBE SECTION OF FLOOR (e.g. entire, east wing, room #, boiler room, lobby, etc.)	AFFECTED SURFACES CONTAINING ACM (e.g. Pipe lagging, ceiling, plenum ducts, storage tanks, decking, etc.)	AMOUNT OF ACM		DESCRIPTION OF WORK BEING PERFORMED (e.g. running cable, installing fire sprinklers, removing and replacing boilers, etc.)
			SQUARE FEET	LINEAR FEET	
10th	Mr. Lustig's Office	Dust on window sills	10		Cleanup of dust from window sills

31. I hereby declare that the information provided herein is true and complete to the best of my knowledge. I am familiar with Federal, State and NYC laws and regulations applicable to asbestos related work.

R. A. West Associates Print Name of Air Monitor  Signature 11/26/01 Date	ACSI Print Name of Asbestos Contractor  Signature 11/26/01 Date	ACSI Print Name of Applicant (If other than Owner)  Signature 11/26/01 Date
---	--	--

32. I understand that as the owner of a building where asbestos abatement activity occurs, I am responsible for the performance of the asbestos abatement activities in accordance with the Asbestos Control Program Rules. I have contracted the third party air monitor who is completely independent of all parties involved in the asbestos project. I hereby declare that I have authorized the filing of this notification for the work specified herein.

Richard Rubel c/o Cedar Management Corp.  11/29/01
 Print Name of Owner Signature Date

A STAMPED COPY OF THIS FORM INCLUDING AMENDMENTS MUST BE AVAILABLE AT THE WORK SITE.

Any modification of information provided on this form must be reported immediately in writing directly to the NYC DEP ACP.

The requirements of the Asbestos Control Program Rules may not be lawfully avoided or lessened through the performance of work in incremental or piecemeal fashion.