



AIRTEK ENVIRONMENTAL CORP.

39 WEST 38TH STREET, 12TH FLOOR, NEW YORK, NY 10018
PHONE (212) 768-0516 FAX (212) 768-0759
WWW.AIRTEKENV.COM

June 9, 2005

Mr. Rajappan Radhakrishnan, Director
New York City Department of Environmental Protection
Bureau of Air, Noise and Hazardous Materials
59-17 Junction Blvd., 8th Floor
Jamaica, NY 11373

Re: Work Plan – 133-135 Greenwich Street and 21-23 Thames Street
Building Decontamination and De-construction

Dear Mr. Radhakrishnan:

The Copper Group, Inc. has engaged Airtek Environmental Corp. (Airtek) to prepare the following project plan in support of the de-construction of the buildings located at 133-135 Greenwich Street and 21-23 Thames Street, New York, NY. This plan is in response to a request by the WTC Regulators for a documented approach to the project.

Though it sustained little physical damage, the buildings at 133-135 Greenwich Street and 21-23 Thames Street were impacted in places by fallout from the events of September 11, 2001. It is the Owner's intent to conduct abatement of in-place asbestos, and to effect a decontamination of the interior of the building so that conventional demolition activities can be completed.

Asbestos Survey:

Airtek has undertaken an asbestos survey intended to coordinate and complete previous survey work that has been conducted at the site. All previous documentation was reviewed and a site survey and bulk sampling was conducted. Based on this survey work, an inventory of in-place asbestos has been developed. The results of this survey are attached.

Site Survey:

A thorough inspection of the subject structures and the adjacent structures has been conducted. Communicating openings, air intakes, and other potential pathways of contamination have been identified for inclusion in the decontamination design. Facility managers for the adjacent structures have been contacted so that engineering controls

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may be implemented to protect occupants. Of particular concern are air intakes of the school building directly to the east of the project site. These concerns are being addressed cooperatively with the Department of Education.

Health & Safety Plan:

A Certified Industrial Hygienist (CIH) from Airtek has developed a site-specific HASP to be applied to all site decontamination operations. The HASP details requirements for access/egress and requirements for Personal Protective Equipment for workers at the site. The HASP is attached.

Community Monitoring:

Prior to initiation of any decontamination/de-construction operations, a Community Monitoring Program developed by an Airtek CIH will be established and operational. The Program will consist of daily air monitoring at four points on the perimeter of the project site. At each sampling point one daily air sample for metals will be collected, and three daily asbestos air samples will be collected. Metals samples will be collected and analyzed in accordance with NIOSH 7300, asbestos by TEM (AHERA Rules). Community Monitoring will continue until building demolition is complete.

NYC DEP Variance Application:

In order to execute the particular requirements of this unique project, specific relief from RCNY Title 15 will be requested by the submittal to NYC DEP of an ACP-7 form with an accompanying ACP-8 Request for Variance form for each of the two structures involved in the project. Variances to be requested will be specific to the conditions in each building, and the variance request will also include the use of Attachment DW (Waste decontamination in Personnel Decon) during the initial lobby-cleaning phase. A copy of the variance request for each building is attached.

NYS DOL Notification:

Due the fact that the decontamination will constitute a 'Large Project' according to Industrial Code Rule #56, notification of the project will be made to the NYS Department of Labor. A copy of the DOSH-486 form is attached.

USEPA Notification:

Due the fact that the decontamination will constitute a 'Large Project' according to EPA AHERA, notification of the project will be made to the USEPA. A copy of the USEPA notification is attached.

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Utilities - General:

Utility service is currently cut off to the building. All electricity and water required for the work will be drawn from sources outside the building.

Monitoring:

Community Monitoring: Perimeter monitoring for asbestos will be conducted at five points around the subject facility. Background sampling prior to any abatement activity will be conducted, and monitoring will continue until final clearance testing is acceptable. All perimeter asbestos testing will be by Transmission Electron Microscopy (TEM AHERA Rules). Metals perimeter testing will be by NIOSH 7300.

Project Monitoring: Throughout the decontamination activities, project air monitoring will be conducted in addition to the Perimeter Monitoring described above. Project Monitoring will be conducted in strict accordance with RCNY Title 15 Chapter 1, Section 1-41 to 1-45, with the exception that all sample analyses will be by TEM.

Clearance Testing: Aggressive area clearance testing for asbestos will be conducted for all work areas by TEM. Aggressive clearance testing for metals will be conducted by NIOSH 7300.

Clearance Criteria:

Clearance testing for asbestos will be acceptable when all samples for a given work area meet the 70 structures per square millimeter TEM standard. Clearance testing for metals will be acceptable when all samples meet the following criteria:

Antimony	250 ug/m3
Barium	250 ug/m3
Beryllium	1.0 ug/m3
Cadmium	5.0 ug/m3
Chromium (III)	250 ug/m3
Copper	500 ug/m3
Lead	25 ug/m3
Manganese	100 ug/m3
Mercury	12.5 ug/m3
Nickel	50 ug/m3
Zinc	1,000 ug/m3

Exterior:

The exterior of the building was decontaminated as a part of the NYC DEP Building Exterior Cleaning Program following 9/11/01. Airtek's visual inspection

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of the façade indicates that it is advisable to conduct low-pressure power washing prior to initialing demolition activities. The exterior of the building will be cleaned in accordance with the NYC DEP WTC Dust/Residue Roof & Façade Cleaning Procedures (attached).

Interior:

Phase 1 – Access Facility:

In order to allow a working space for access/egress, and to keep the Decontamination facility out of the work area, a preliminary soft strip and clean-up of the 133 Greenwich Street retail store area. This abatement will be conducted according to Subchapter G with a Personnel Decon exterior to the building. Attachment DW will be used to allow the cleaning of the small amount of waste for this preliminary phase. Upon satisfactory Clearance by TEM, this Decon will be dismantled, and a Decon facility will be established in the cleaned lobby space to support the balance of the decontamination.

Phase II - In Place ACM:

In-place ACM has been identified as follows:

133-135 Greenwich Street

1. Roof Flashing – 35 sf
2. Bulkhead Tar – 10 sf

21-23 Thames Street

1. Roof Membrane – 350 sf
2. Flashing – 100 sf
3. Tar – 20 sf
4. Window Caulk – XX Masonry Openings
5. Coping Stone Caulk – XX lf
6. Pipe Insulation – 50 lf

These materials will be abated last in the decontamination sequence. For detailed information on the asbestos survey conducted, please refer to the Airtek Asbestos Survey Report dated May 31, 2005 (Attached).

Phase III – Soft Strip:

All interior materials, including moveable objects, will be subject to decontamination and removal or, if porous, will be bagged and disposed of as ACM waste. All ceiling systems (plaster, tiles, sheetrock, etc.), wall systems (plaster, wall board, etc.), and floor systems, (tiles, carpet, etc.) will be removed

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and bagged for disposal as ACM waste. Remaining structural members will be wet-wiped, HEPA vacuumed, and encapsulated with a penetrating encapsulant. All accessible interstitial spaces will be wet-wiped, HEPA-vacuumed, and encapsulated. Operable windows will be articulated, wet wiped, HEPA-vacuumed, and encapsulated.

Following 2nd and 3rd cleanings and the settling periods, final air testing will be conducted by TEM. Upon successful clearance air testing, the building will be turned over to the demolition contractor for conventional demolition.

Structural Framing:

Due to the impossibility of removing structural framing without the risk of building collapse, all structural framing will be wet-wiped, HEPA vacuumed, and encapsulated with penetrating encapsulant. As a part of the conventional demolition that will follow the decontamination, these materials will be characterized for asbestos content and RCRA characteristics, and will be disposed of as appropriate based on the test results.

Conventional Building Demolition:

Permits:

Contractor will obtain all governmental permits necessary to perform the work including, but not limited to sidewalk bridges, D.O.T., etc.

Contractor will comply with requirements of any city, state or federal agencies (including OSHA) relating to the demolition work, including the requirements of the New York City Environmental Control Board and the New York City Building Enforcement Safety Team ("BEST Squad"). Contractor will comply with all provisions of the New York City Building Code.

Site Protection:

A sidewalk bridge exists along Greenwich and Thames Streets and will remain in place for the duration of Contractor's work. The sidewalk bridges have been installed and are maintained by the LMDC, not the owner of the site. Contractor is responsible to protect the sidewalk bridge during demolition. In the event a portion or section of the bridge needs to be removed and/or relocated, contractor will coordinate this work with the owner.

The Contractor will be responsible for all temporary protection to any adjacent buildings and/or lots. Contractor will include roof top protection, sidewalk bridges as required to perform this work.

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Contractor will maintain the project site, adjacent sidewalks and streets free from debris and garbage, including daily sweeping of sidewalks for the duration of contractor's work.

Contractor will provide and maintain a plywood fence along Greenwich and Thames Streets with gates along the front and side of the property. All work to be coordinated with NYC DOB temporary fence permit. Upon completion of the Contractor's work, the fence and gates will be left in an acceptable condition, with gates in locations approved by, and coordinated with, the General Contractor. General Contractor will obtain fence permit(s) and maintain permit(s) for the duration of the project. Fence will comply with NYC Department of Building requirements and will be constructed of minimum 5/8" exterior grade plywood (good one side) on two by four frames. Fence will be painted Dark Blue and will have "Post No Bills" painted a maximum of 10 feet on center. Fence will be constructed with wood or metal posts at regular intervals. Post will be sunk into the ground as required to make them free standing without bracing or outriggers. Fence will be constructed such that sections of it are easily removable without disturbing remaining sections. Do not create blind spots on sidewalk.

Site Work:

Contractor will perform proper dust control during any demolition or removal work.

The Contractor will comply with all federal and local laws regarding noise control.

All work will be done by appropriately qualified labor. The Contractor will be responsible for employing qualified tradesmen for the duration of Contractor's contract work on this project.

All work is to be performed in accordance with the latest standards as established by OSHA.

Demolition of a 2-story brick structure, and 5-story brick structure:

- a. All existing interior garbage, furniture, fixtures, equipment and surfacing materials (plaster/wallboard/ceiling systems, etc.) will have been removed under Phase III above.
- b. Remove and dispose of existing brick party wall attached to the South side of 120 Cedar Street. Work includes patching holes after demolition. Work does not include waterproofing.
- c. Complete demolition of above grade structures and ground level framing. Existing foundation wall, vaults and sidewalk will remain.
- d. Remaining exposed cellar slab will be left free from demolition debris.
- e. All utilities serving the buildings will be disconnected as required before any removal and/or demolition is started.

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- f. Removal and dispose of roof, flashing and associated roofing material.
- g. Obtain and secure all required permits to complete demolition work, including but not limited to demolition permit, fence permit, sidewalk closing permit, etc. Cost for obtaining permits is the responsibility of this trade contractor.
- h. Upon completion of demolition work, demolition contractor will provide a "berm" along the foundation walls around the perimeter of the site. The berm will be used to temporarily support the foundation walls until the excavation / foundation contractor starts work. The berm will be set on a 45 degree angle and start from the top of existing foundation wall to the cellar slab,

End