

8. Pre-cleaning and Post-cleaning Wipe Sampling Procedures How does this section relate to Sections 3. f and g above? It looks like we are saying to monitor a set of residences where no clean up will occur and that is what Section 3 is all about. If so, the title for Section 3 should reflect that, e.g., Sampling Of Residences That Will Not Be Cleaned. Then Section 4 should be titled something like, Sampling Of Residences That Will Be Cleaned., followed by a statement that the directions in Section 3 will be followed for these residences with the exception of sections f and g for which sections a and b should be substituted.

a. The Project Monitor will collect pre-cleanup and post-cleanup wipe samples at 5 percent of the residences cleaned up to a maximum of 50 units per quadrant as instructed by EPA. Units and quadrants should be defined. Why are only 5 % being sampled rather than the 10% as done in Section 3? Is this because the set of cleaned residences is much larger than that of the residences that will not be cleaned? What are the criteria for selection? This sampling will consist of the collection of 3 pre clean-up and 3 post clean-up wipe samples for dioxin, total metals and mercury (Note: a separate wipe sample is required for each parameter). **Metals and mercury wipe samples will be collected in accordance with procedures specified in HUD Appendix 13.1. Dioxin wipe samples will be collected in accordance with the procedures specified in ASTM D 6661-01.** What are the criteria for selecting 5% of the residences?

- b. The contractor shall document all the necessary information regarding sampling activities, fill out all field logs, data sheets, and chain-of-custody forms. The contractor shall use F2L for all sample and chain-of-custody documentation. Samples must be labeled and accompanied with completed chain-of-custody forms before shipping to the designated laboratory. The label must include the EPA Project Tracking Number. Samples will be packed, sealed and hand-delivered for analysis to EMSL laboratories at: 307 W. 38th St., New York, New York 212-290-0051. Metals samples will be analyzed using EPA Method SW-846 6010B. Mercury samples will be analyzed using EPA Method SW-846 7471A.

Deliverables

The Project Monitor shall review all deliverables prior to submission to EPA. The review shall assure that each deliverable is accurate and complete, technically sound, and free of clerical errors.

The Project Monitor shall complete chain-of-custody forms and record the number of wipe samples, EPA Project Tracking Numbers, the laboratory address, date, and sample IDs in an agreed upon electronic format or website approved by EPA within 24 hours of activity.

9. The Monitoring contractor shall evaluate all HVAC systems in all residential buildings where cleaning will take place to determine if these systems have been impacted by dust or debris from the collapse of the World Trade Center and if these systems require cleaning. This evaluation should occur prior to any of the residence. In cases where cleaning is requested for a whole building, the building's HVAC system will be evaluated as a whole. In cases where cleaning is requested for an individual residential unit, portions of the HVAC system