

TO: Michael Gilsonan
NYC DEP

FROM: Nancy Jeffery (NYC DOHMH)
Robert Chinery (NYSDOH)

DATE: August 2, 2002

SUBJECT: Comments on SOWs for: WTC Indoor Dust Cleaning Program Cleaning
and Monitoring Contracts

We have reviewed the draft July 30, 2002 scope of work for the two contracts and have the following comments. Comment 3 specifically addresses the proposed procedures for addressing mold issues:

Monitoring Contract Scope of Work

1. Introduction (page 1) 2nd Paragraph, last sentence, should be modified to reflect the fact that in some of the residences/buildings, dust wipe samples will also be collected. Currently, the sentence states that contractors will follow-up with asbestos and asbestos air sampling only.
2. Deliverable 7 c. vi. (page 4) states that the project manager will advise EPA of other circumstances that may require deviation from the specified cleaning and monitoring procedures. The question we raise is related to what will be the incentives for the project monitor or cleaning contractor to look for non-routine reservoirs of potential WTC-related dust and debris? For example, it's not clear whether the cleaning contractor would be paid a flat fee per residence/building or whether there would be incentives to search out other possible dust reservoirs in the buildings.
3. Deliverable 8 (page 5), last sentence states that cleaning will not proceed in areas where mold is observed until potential hazards are evaluated and addressed if necessary. The sentence is very broad and is not clear who would make sure the mold issues are addressed. As addressing long-standing mold issues can take a very long time, we suggest that the project manager should notify EPA and contact DOHMH if visible mold conditions exist so they can be evaluated. The project managers should also be provided a copy of and be familiar with the DOH's Mold Assessment and Remediation Guidelines so that common bathroom mold conditions do not stop the important clean-up work from proceeding.
4. Deliverable 9 (page 5), the word "paint" is missing from the 3rd sentence.
5. Deliverable 10 (page 5), 1st sentence states that HVAC systems will be evaluated to determine if these systems have been impacted by dust or debris

from the collapse of the WTC. How will it be determined that the dust/debris present is WTC-related? It is not clear how the project monitor would be able to make such a determination.

6. Deliverable 10 a (page 5) states that if an individual wants their residence cleaned, the HVAC system dedicated to that residence will be evaluated. The problem is that cleaning of only one area of an HVAC system may not be sufficient if the rest of the HVAC system is impacted.
7. Deliverable 12 f (page 7) states that wipe samples for dioxin, total metals and mercury will be conducted at 10 percent of the residences where sampling only has been requested. Total metals and mercury are not contaminants that have been identified as WTC-related Contaminants of Potential Concern (see most recent version of the EPA COPC document) and we suggest that sampling be limited to only COPC contaminants.

Cleaning Contract Scope of Work

1. Scope of Work A, 6 (page 3) states that contractor and EPA will determine if elevator shafts contain significant WTC dust /debris. It is unclear how that determination will be made.
2. Scope of Work A, 9 (page 5) states that HEPA air filtration devices (AFDs) will run continuously during all cleaning activities given appropriate conditions. Please add in that the return air should be derived from a non-impacted source (i.e. open window), so that the devices will not be pulling in air from areas that have not yet been cleaned (nearby residence or common space.)

We hope these comments are helpful. Please feel free to call us at: 212-788-4290 (Nancy) or 518-402-7511 (Robert).

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this AM. Also take
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comments. They are
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Thank
MB
8/6/02

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