

EPA/NYC Indoor Air Approach DRAFT SUBJECT TO CHANGE May 20,2002

Overarching Goal: To Develop an Action Plan which contains Near and Longer Term Components. This Action Plan is designed to support NYC residents and worker populations, so they may have confidence and protection regarding any potential significant increased health risks which might result from the exposure in their indoor environments on a long term basis to potential contaminants from the collapse of the WTC buildings and associated fires. Maintaining this confidence and protection will enable and enhance the economic revitalization of Lower Manhattan on an expedited basis. Near term actions will focus on confirming or refining, if appropriate, clean up techniques, removing remaining debris/dust from the WTC collapse and offering clean up and post clean up sampling to residents.

Program Implementation:

- EPA will be the lead agency for overseeing all actions of the program.
- NYCDEP is collaborating and supporting the program by taking responsibility for issuing and managing contracts for key components of the program and for directly implementing three of the projects: cleaning of unoccupied buildings, cleaning of exteriors of buildings and obtaining HVAC expertise.
- EPA will directly implement the pilot building cleaning effort and the background study.

Program Components:

A) Near-term: The goal of the near term program is to provide cleaning and sampling to residents of Lower Manhattan upon request, to provide additional indoor air sampling data for asbestos to evaluate qualitatively the effectiveness of clean up techniques, to provide confirmation of information on recommended clean up techniques, and to assure removal of any remaining debris/dust outside of WTC ground zero area which may still remain, thereby eliminating potential for re-entrainment in the air.

Timing of Near Term Efforts: Activities are underway now to prepare for the EPA hotline becoming operational on May 30. Outreach efforts will begin shortly to advertise the availability of the cleaning and testing program. Duration of all efforts may continue through December depending upon public response.

1. Cleaning of Debris-Laden Unoccupied, Uncleaned Buildings

Program: The remaining unoccupied (residential and commercial), uncleaned buildings near the WTC site that contain WTC-debris will be cleaned. NYC will work with building owners to determine reasons that these buildings have not been cleaned yet. If building owners are not able to expeditiously clean their property, NYC will proceed. It is estimated that there are 5-10 of these buildings.

Implementation: NYCHPD and OEM will identify buildings. NYCDEP will obtain access. NYCDEP will contract this cleaning activity to asbestos abatement companies and also will perform oversight of the contractors. EPA and OSHA will perform limited oversight of this activity, primarily by providing field checks.

2. Pilot Building Cleaning Effort to Confirm Cleaning Techniques

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Program: EPA will clean one unoccupied building to confirm and test the techniques recommended for removing WTC-debris material from the indoor environment. This project will be designed to reassure the public that the techniques which have been recommended for apartment clean ups, that is, wet wiping, wet mopping and use of HEPA filters, are the most effective techniques available and prevent inhalation exposure to asbestos and other fibrous materials, as well as other potential indicator compounds. Additional advice on cleaning will be provided if results suggest this is appropriate.

Implementation: EPA will conduct this project. Access arrangements have begun for the target building. Cleaning will be contracted out by Region 2. Analysis will be conducted by contract labs through contracts established by OSWER.

3. Direct Assistance to Residences and Residential Buildings Owners

Program: EPA will establish mechanisms to offer assistance to individuals that self-identify as having cleaning concerns in lower Manhattan within a geographic area bounded on the south, east and west by the coastline and on the north by the south side of Canal Street and the Manhattan Bridge approach road.

The assistance will include the following options:

- a) Cleaning within apartments and building open spaces, followed by air asbestos testing, using asbestos abatement contractors.
- b) Testing for airborne asbestos within residences or building areas. Should testing results identify an airborne asbestos problem, arrangements can be made rapidly to have professional clean up done.
- c) Providing reimbursement for the purchase of HEPA vacuums to residences who request to perform their own cleaning on an ongoing basis

Implementation: The area will be divided into quadrants and 1 cleaning contract and 1 monitoring contract will be issued for each of the 4 areas for a total of 8 contracts. NYCDEP and EPA will jointly develop the scopes of work for the bid announcements. Initial drafts are under review. NYCDEP will issue these contracts. EPA will provide lead oversight of the implementation of the program.

The monitoring contractor will be the primary contact for a resident after their call to the hotline. This contractor will schedule cleaning and/or testing with the resident and will coordinate with the

cleaning contract on behalf of the resident. The monitoring contractor will also conduct the post-cleaning sampling and the sampling if the resident requests testing without cleaning.

Based on existing data evaluated by OSHA during lower Manhattan indoor clean-ups, OSHA determined that these contractors will not be required to use protective clothing or gear. An oversight function will be designed to assure that if unexpected situation is confronted, there will be further determination with OSHA support of whether protective clothing and gear is warranted. In such a case the cleaning will be done using appropriate personal protective equipment.

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← Monitoring will be for airborne asbestos only. Two screening values will be used: the AHERA value of 70 s/mm² or .022f/cc and the long term risk based value of .0004f/cc. EPA's contract lab will be performing the analysis. PCM and TEM analysis will be conducted. A PCMe value will be calculated based on the number of long fibers detected. The PCMe value will be compared to the screening values. If both values are not met in the post-cleaning results, cleaning will re-occur. If both values are not met in the testing-only locations, cleaning will occur. If values are met in the testing-only locations, no cleaning will be provided (at this time) under this program.

Aggressive sampling procedures will be employed where possible. There may be individual reluctant to allow the use of leaf blowers in their apartments, for health concerns or other reasons, approaches to deal with this are being explored.

Access issues are still being worked out in NYCDEP's Counsel's office and NYC's Law Department. EPA will be responsible for obtaining access.

EPA will notify residents of the results of the sampling.

EPA will solicit participation in this direct assistance program through public announcements. An EPA hotline will be established to receive requests from the public as soon as possible. The hotline will become operational May 30, 2002. The purpose of the hotline is to identify residents who want cleaning or testing. Operators will ask basic questions then the information will be provided to a monitoring/scheduling contractor who will contact the resident to schedule cleaning then testing or only testing. NYCDEP will be issuing the contract for this hotline.

All information collected in this program will be entered into a database. EPA-OEI will be developing the database architecture and will be providing it at first to the hotline contractor. It is not yet determined if the monitoring contractors will maintain separate databases or will be required to use a global EPA database.

FEMA will provide a tele-register number for individuals to call to receive reimbursement for the purchase of HEPA vacuums. This number will be provided to residents when they request this item of EPA's hotline.

4. Clean Up of Exteriors of Buildings with Residual Debris/Dust

Program: NYCDEP will remove the remaining dust/debris resulting from the WTC collapse on building exteriors in Lower Manhattan thereby assuring this material will not become re-entrained in the air at a future time, thus creating a potential exposure to the public.

Implementation: NYCDEP will contract for the cleaning of the exteriors of approximately 250 buildings in Lower Manhattan and will provide direct oversight of the contractor. EPA and OSHA will provide limited oversight of contractors. Building owners have been notified and work will begin on shortly. Air monitoring will be done on roofs when debris is being cleaned from the roofs and on the ground when facades are being cleaned.

5. Targeted Sampling to Determine if There are Occupied Locations Require Additional Cleaning

Program: EPA will collect airborne asbestos samples within a variety of residential buildings in lower Manhattan south of Canal Street to have quantified data across a broad geographic area in Lower Manhattan, south of Canal Street as the most likely areas of impact. Based upon this data, and other data available, EPA and NYC expect to have a better ability to provide a qualitative reassurance that clean ups already conducted by building owners and residence are effective.

Implementation: EPA will work with building owners and residents to obtain access for this sampling. This will be distinct from the self identifying program. Sampling will be for airborne asbestos using the same analytical procedures as for the direct assistance program. If sampling indicates that cleaning is required, EPA, working with NYC, will ensure that the cleaning is undertaken. EPA will publically release the information collected from this sampling as it becomes available on a rolling basis, to keep the public informed of results. NYCDEP will issue the contract for this as part of its monitoring contract. EPA will use its analytical contract.

6. Review of Cleaning Methods for HVAC Systems in Lower Manhattan.

Program: NYCDEP will obtain the services of individuals with HVAC expertise (industrial hygienists) to determine if additional recommendations for cleaning of HVAC systems are warranted.

B) Longer Term: The goal of the longer term aspects action plan are to identify potential indicators of concern, that is, compounds which resulted from the WTC collapse and subsequent fires that have not been evaluated in the indoor environments thus far. Several steps are needed, since there are no widely accepted indoor air benchmarks for these compounds, and there is not a good data base for understanding the "background" levels of the compounds which were in the NYC urban environment prior to 9/11. Gathering this additional data, along with the Pilot Building Clean Up Effort, will assist health agencies and EPA to evaluate qualitatively how the potential contaminant compounds relate to pre-9/11 conditions and how the clean up guidance addresses any potential concerns. This will lead finally to an assessment of whether any additional action is needed in Lower Manhattan regarding indoor air concerns.

NYCDEP

Timing of the Longer Term Actions: Initial Actions have been initiated by agency staffs. Actions listed here could begin by June 1 and continue through February 2003.

1. Sampling to Determine Background Levels of Potential Contaminants

Program: EPA will sample residences in areas of NYC unaffected by WTC-related debris to establish what may be considered pre-existing levels of potential contaminants. It is likely that this sampling will occur north of 78th Street or whatever the appropriate designation is based upon improbability of any impacts from the WTC collapse and fire. This will assist EPA, ATSDR, NYSDOH and NYCDOH in evaluating how the potential contaminants from the WTC disaster relate to pre-existing conditions.

Implementation: EPA will primarily conduct this project. NYCDOH will be responsible for assisting obtaining access to background locations and preparing notifications of results to residents. Monitoring will be done by contractors obtained through an OSWER contract. Analysis will be done by the same EPA - HQs contracts as the pilot cleaning effort. Seven potential indicators of concern have been identified, and air and debris/dust samples will be taken.

2. Creating a Data System with Existing Information Collected by NYC from the Private Sector on Environmental Testing Results and Clean Up Activity

Program: NYC has received information on clean up actions and air monitoring, possibly more, from the building owners of a significant portion of the buildings in Lower Manhattan. Other information may also be available on building status. Making all such data available in an organized and readily accessible way will enhance ability to assess potential concerns related to indoor air environment.

Future Possible Action as Follow up to Above Action Plan

Identifying the Need for any further Potential Clean Up or Testing Support for Lower Manhattan

Objective: Be prepared to establish any necessary further Action Plan items for clean up or testing or information on clean up techniques which may emerge out of the various data collection, analysis and organizational efforts.

Program: Unknown at this time. Must await results of above efforts.