



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Flushing, New York
11373-5108

**Christopher O. Ward
Commissioner**

October 11, 2002

Ms. Kathleen Grimm
Deputy Chancellor, Finance & Administration
New York City Department of Education
52 Chambers Street
New York, New York 10007

Dear Ms. Grimm:

The New York City Department of Environmental Protection has reviewed the asbestos air sampling reports prepared by Taylor Environmental Group, Inc.

The results indicated sampling and analysis was in accordance with the Asbestos Hazard Emergency Response Act (AHERA) requirements. According to the submitted reports, sampling was performed in the auditorium, library, basement, elevators, 1st floor and on the 3rd through 10th floors.

The results indicate the clearance and re-occupancy criteria set forth in AHERA (70 s/mm²) were met.

Micro-vacuum sampling is not a recognized method for asbestos sampling. Further, the New York State Department of Health has not approved the analytical method for the micro-vacuuming samples.

We acquiesce to the Department of Health's recommendations that the Department of Education's carpet-removal protocols would be sufficiently protective of the health of students, teachers, and staff within the school such that the removal process itself would not create a risk to health.

Sincerely,

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

R. Radhakrishnan
Director
Asbestos Control Program



(718) DEP-HELP



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Flushing, New York
11373-5108

**Christopher O. Ward
Commissioner**

March 3, 2003

Ms. Kathleen Grimm
Deputy Chancellor
New York City Department of Education
The Tweed Courthouse
New York, New York 10007

Dear Deputy Chancellor Grimm:

After consulting with the Department of Education and reviewing the letters of support from the United States Environmental Protection Agency (USEPA) and the New York City Department of Health (NYCDOH), please be advised that we acquiesce to their recommendations regarding the carpet removal at New York City Department of Education schools impacted by the collapse of the World Trade Center.

USEPA and the NYCDOH have stated that the removal of carpet is a reasonable and proper action to eliminate concerns regarding potential contaminants in this porous material. The DEP concurs with this assessment.

According to our information, the environmental air sampling results at these schools indicated sampling and analysis was in accordance with the Asbestos Hazard Emergency Response Act (AHERA) requirements. Specifically, the results indicate the clearance and re-occupancy criteria set forth in AHERA (70 s/mm²) were met.

If you have any questions, please contact me at (718) 595-3721.

**Robert C. Avaltroni
Deputy Commissioner**

**Bureau of
Environmental
Compliance**

Tel (718) 595-4418
Fax (718) 595-4422

Sincerely,

A handwritten signature in black ink, appearing to read "R. Avaltroni", with a long, sweeping line extending from the end of the signature.

Robert C. Avaltroni
Deputy Commissioner



www.nyc.gov/dep

(718) DEP-HELP



**Department of
Environmental
Protection**

59-17 Junction Boulevard
Flushing, New York
11373-5108

**Christopher O. Ward
Commissioner**

February 13, 2003

Ms. Kathleen Grimm
Deputy Chancellor
New York City Department of Education
The Tweed Courthouse
New York, New York 10007

Dear Deputy Chancellor Grimm:

After reviewing the letters of support from the United States Environmental Protection Agency (USEPA) and the New York City Department of Health (NYCDOH), please be advised that we are not opposed to the carpet removal at New York City Department of Education schools impacted by the collapse of the World Trade Center.

USEPA and the NYCDOH have suggested that the removal of carpet is a reasonable and proper action to eliminate concerns regarding potential contaminants in this porous material.

According to our information, the environmental air sampling results at these schools indicated sampling and analysis was in accordance with the Asbestos Hazard Emergency Response Act (AHERA) requirements. Specifically, the results indicate the clearance and re-occupancy criteria set forth in AHERA (70 s/mm²) were met.

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



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According to our information, the environmental air sampling results at these schools indicated sampling and analysis was in accordance with the Asbestos Hazard Emergency Response Act (AHERA) requirements. Specifically, the results indicate the clearance and re-occupancy criteria set forth in AHERA (70 s/mm²) were met.

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Deputy Commissioner



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February 13, 2003

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New York City Department of Education
The Tweed Courthouse
New York, New York 10007

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According to our information, the environmental air sampling results at these schools indicated sampling and analysis was in accordance with the Asbestos Hazard Emergency Response Act (AHERA) requirements. Specifically, the results indicate the clearance and re-occupancy criteria set forth in AHERA (70 s/mm²) were met.

**Robert C. Avaltroni
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R. Radhakrishnan, P.E.
Director, Asbestos Control Program



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THE CITY OF NEW YORK
DEPARTMENT OF HEALTH AND MENTAL HYGIENE

Michael R. Bloomberg
Mayor

Thomas R. Frieden, M.D., M.P.H.
Commissioner

nyc.gov/health

January 29, 2003

Deputy Chancellor Kathleen Grimm
New York City Department of Education
The Tweed Courthouse
New York, NY 10007

Dear Deputy Chancellor Grimm:

This letter was prepared at your request for the purpose of FEMA reimbursement. The letter addresses the issue of carpeting removal at public schools in Lower Manhattan that were affected by the collapse of the World Trade Center, that is, PS/IS 89, PS 150, PS 234, Stuyvesant High School, the High School of Economics and Finance and the High School of Leadership and Public Service.

There have been concerns raised about possible contamination of carpeting at these schools resulting from the collapse of the World Trade Center. The Department of Health and Mental Hygiene has worked collaboratively with the Department of Education, and its independent environmental consulting firm, on environmental sampling and clean-up efforts at these schools. The Department of Health strongly recommended that the Department of Education remove floor carpeting as part of their continued clean-up efforts.

The Department of Health reviewed the "Carpet Removal Protocol" as provided by the Department of Education. The Department of Health concluded that removal performed in accordance with these protocols would be sufficiently protective of the health of students, teachers, and staff within the schools such that the removal process itself would not create a risk to health.

Sincerely,

Kelly R. McKinney P.E.
Associate Commissioner

Avaltroni, Robert

From: Onek Matthew [MOnek@nycboe.net]
Sent: Wednesday, February 19, 2003 1:18 PM
To: Avaltroni, Robert
Cc: Onek Matthew
Subject: EPA and DOH Letters Attached



Stuyvesant HS
FEMA carpet lett...



EPA letter re
FEMA.doc

Per our various emails and conversations, I am attaching both the

EPA

and the NYC Department of Health's letters re carpet removal at Ground Zero schools to be used for FEMA reimbursement. As we discussed, FEMA has requested a similar letter from you. Your letter simply needs to restate that you have been consulting with us and that you recommended the carpet removal as part of our continued clean-up letters. If you have any questions, please call me at 374-0214. I will follow-up with you later today. FEMA would like us to submit our materials in the next few days. Thanks again for your continued help.

Matt Onek

May 23, 2002

The Honorable James F. Brennan
Member of Assembly, 44th Assembly District
416 7th Avenue
Brooklyn, NY 11226

Dear Assemblyman Brennan,

As the Department of Environmental Protection (DEP) has received a number of letters that raise issues that are related to the air quality in and around Stuyvesant High School, the goal of this letter is to respond to the various concerns that would include those presented in your individual letter.

This agency is one among a number of other City, State, and Federal agencies that has been addressing various air quality issues related to the tragedy at the World Trade Center site. DEP has been involved in ongoing meetings with these agencies. The Board of Education and School Construction Authority have taken the lead on several of the issues that you have raised in your correspondence, as it falls within their jurisdiction.
Conducting an extensive sampling program in and around each school.

If you need any assistance in obtaining the requested information, please do not hesitate to contact Deputy Commissioner Robert Avaltroni at (718) 595-4418.

Sincerely,

Christopher O. Ward
Commissioner

C: Robert Avaltroni
Geraldine Kelpin
Log #11241

As the Department of Environmental Protection has received a number of letters that raise issues that are related to the air quality in and around Stuyvesant High School, the goal of this letter is to respond to the various concerns that would include those presented in your individual letter.

This agency is one among a number of other City, State, and Federal agencies that has been addressing various air quality issues related to the tragedy at the World Trade Center site. DEP has been monitoring the outside ambient air for asbestos levels at the entrances to Stuyvesant High School, PS/IS 89, PS 234 and the High School of Economics and Finance. We began monitoring at the schools on October 4, 2001, and are committed to continuing that monitoring for as long as needed. We are using the AHERA standard for an acceptable asbestos level inside a school as an outside air quality indicator. All of our results have been well below that standard of 70 structures/sq. mm. The Board of Education has taken the lead on conducting an extensive sampling program in and around each school. We are forwarding your e-mail to the Board to provide you with more information on their monitoring, clean-up efforts and on-going building maintenance efforts.

DEP has provided a great deal of input into the dust suppression protocol for debris removal and barge operation and our observations of the work efforts have shown great improvement since the work began. However, we will continue to follow-up on operations at ground zero and at the barges. We will forward any findings and recommendations to the appropriate Federal, State or local authority. We have asked the Department of Design and Construction, who are overseeing the work, to respond to you in more detail on the effectiveness of these measures.

DEP strongly supports the effort to have low sulfur fuel used at the site and the introduction of additional control technologies on both mobile and stationary equipment that is and will continue to be used at this site. We are asking the New York State Department of Environmental Conservation to provide you with more details on the transition to this fuel and their efforts on reducing vehicle idling.

If you need any assistance in obtaining the requested information, please do not hesitate to contact ~~Deputy Commissioner Robert Avaltroni~~ at (718) 595-4418.

NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL COMPLIANCE
RESULTS OF ASBESTOS AIR MONITORING

No	Date	PS 314K 330 59th Street, Bk	IS 155 Jackson & E 148, BX	PS 64 600 East 6th Street, MN	PS 199 30-20 48th Street, Qn	Susan Wagner H. S. 1200 Manor Road, SI
1	09/14/01	0.003 f/cc	NA	< 0.001 f/cc	0.002 f/cc	0.005 f/cc
2	09/14/01	0.003 f/cc	NA	0.002 f/cc	0.002 f/cc	0.004 f/cc
3	09/15/01	< 0.001 f/cc	0.003 f/cc	0.002 f/cc	< 0.001 f/cc	< 0.001 f/cc
4	09/15/01	< 0.001 f/cc	0.003 f/cc	0.003 f/cc	0.002 f/cc	< 0.001 f/cc
5	09/15/01	< 0.001 f/cc	< 0.001 f/cc	< 0.001 f/cc	< 0.001 f/cc	< 0.001 f/cc
6	09/16/01	0.006 f/cc	< 0.001 f/cc	0.008 f/cc	0.002 f/cc	0.003 f/cc
7	09/16/01	0.004 f/cc	0.003 f/cc	0.002 f/cc	0.003 f/cc	0.002 f/cc
8	09/16/01	0.002 f/cc	< 0.001 f/cc	0.004 f/cc	< 0.001 f/cc	< 0.001 f/cc
9	09/16/01	NA	NA	0.006 f/cc	NA	NA
		REGULATORY LIMIT 0.01 f/cc				

3/20/02

NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL COMPLIANCE

RESULTS OF ASBESTOS AIR MONITORING**REGULATORY LIMIT 0.01 f/cc & 70 s/sqmm**

No	Date	H.S. E.F 100 Trinity Place	P.S. 234 282 Grennwich St.	Stuyvesant H.S. 345 Chambers St.	I.S. 89 201 Warren St.
1	10/04/01	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc	0.003 f/cc
2	10/05/01	0.004 f/cc	0.003 f/cc	< 0.002 f/cc	< 0.002 f/cc
3	10/06/01	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc
4	10/07/01	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc	.018 f/cc (40 s/sqmm)
5	10/08/01	0.005 f/cc	< 0.002 f/cc	< 0.002 f/cc	0.007 f/cc
6	10/09/01	< 0.002 f/cc	0.004 f/cc	< 0.002 f/cc	0.003 f/cc
7	10/10/01	0.003 f/cc	0.003 f/cc	0.003 f/cc	0.004 f/cc
8	10/11/01	0.003 f/cc	0.003 f/cc	< 0.002 f/cc	0.003 f/cc
9	10/12/01	< 0.002 f/cc	< 0.002 f/cc	0.007 f/cc	0.003 f/cc
10	10/13/01	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc
11	10/14/01	< 0.002 f/cc	< 0.002 f/cc	0.004 f/cc	0.005 f/cc
12	10/15/01	0.005 f/cc	0.003 f/cc	< 0.002 f/cc	< 0.002 f/cc
13	10/16/01	0.004 f/cc	0.002 f/cc	0.003 f/cc	< 0.002 f/cc
14	10/17/01	0.003 f/cc	0.003 f/cc	0.002 f/cc	0.004 f/cc
15	10/18/01	0.004 f/cc	< 0.002 f/cc	< 0.002 f/cc	< 0.002 f/cc
16	10/19/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
17	10/20/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
18	10/21/01	< 13.33 s/sqmm	< 13.33 s/sqmm	13.33 sq/mm	< 13.33 s/sqmm
19	10/22/01	13.33 s/sqmm	* < 13.33 s/sqmm	13.33 s/sqmm	< 13.33 s/sqmm
20	10/23/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
21	10/24/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm

No	Date	H.S. E.F 100 Trinity Place	P.S. 234 282 Grennwich St.	Stuyvesant H.S. 345 Chambers St.	I.S. 89 201 Warren St.
22	10/25/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
23	10/26/01	< 13.33 s/sqmm	13.33 s/sqmm	< 13.33 s/sqmm	13.33 s/sqmm
24	10/27/01	40 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
25	10/28/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
26	10/29/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
27	10/30/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
28	10/31/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	13.33 s/sqmm
29	11/01/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
30	11/02/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
31	11/03/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	13.33 s/sqmm
32	11/04/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
33	11/05/01	13.33 s/sqmm	13.33 s/sqmm	26.67 s/sqmm	13.33 s/sqmm
34	11/06/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
35	11/07/01	< 13.33 s/sqmm	< 13.33 s/sqmm	40 s/sqmm	< 13.33 s/sqmm
36	11/08/01	< 13.33 s/sqmm	< 26.67 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
37	11/09/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
38	11/10/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
39	11/11/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
40	11/12/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
41	11/13/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 8.89 s/sqmm
42	11/14/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
43	11/15/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
44	11/16/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
45	11/17/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm

No	Date	H.S. E.F 100 Trinity Place	P.S. 234 282 Grennwich St.	Stuyvesant H.S. 345 Chambers St.	I.S. 89 201 Warren St.
46	11/18/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
47	11/19/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
48	11/20/01	< 13.33 s/sqmm	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
49	11/21/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
50	11/22/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
51	11/23/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	28.67 s/sqmm
52	11/24/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
53	11/25/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	13.33 s/sqmm
54	11/26/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
55	11/27/01	13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
56	11/28/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
57	11/29/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
58	11/30/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
59	12/01/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
60	12/02/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
61	12/03/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
62	12/04/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
63	12/05/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
64	12/06/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
65	12/07/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
66	12/08/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 8.89 s/sqmm
67	12/09/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
68	12/10/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm
69	12/11/01	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm	< 13.33 s/sqmm

No	Date	H.S. E.F 100 Trinity Place	P.S. 234 282 Grennwich St.	Stuyvesant H.S. 345 Chambers St.	I.S. 89 201 Warren St.
166	03/18/02	< 14.3 s/sqmm	< 14.3 s/sqmm	< 14.3 s/sqmm	< 14.3 s/sqmm
167	03/19/02	< 14.3 s/sqmm	< 14.3 s/sqmm	< 14.3 s/sqmm	< 14.3 s/sqmm

Total Volume= 1200 liters

Sampling Time= 8hrs.

CARPET REMOVAL PROTOCOL

Note: All work as outlined in this protocol is to be performed by a NYS DOL licensed asbestos abatement contractor using US EPA / NYC DEP certified asbestos abatement personnel.

- 1. Shut down the ventilation and air-conditioning (HVAC) system(s) for the room.**
- 2. Remote personal/waste decontamination unit(s) will be constructed and located adjacent to the area.**
- 3. All penetrations that can be reached using an 8 foot ladder (such as windows doorways, supply air diffusers, return air grilles etc.) shall be sealed with 2 layers of 6 mil plastic sheeting sealed with tape.**
- 4. A thorough visual inspection will be performed by a third party consultant to verify that all required engineering controls are in place and work correctly.**
- 5. Pre-clean and remove any furniture (that is not stationary) and associated floor surfaces twice using HEPA filtered vacuum equipment. After the furniture and associated floor surfaces have passed a thorough visual inspection, all removable objects shall be covered with two layers 6 mil plastic sheeting and sealed with tape, and the removable objects shall be removed.**
- 6. All carpeted floor surfaces shall be saturated with an approval lock-down encapsulate and then covered with two layers 6 mil plastic sheeting sealed with tape.**
- 7. The plastic covered carpet shall be continually misted with amended water while it is being cut into manageable sections and rolled up. When a section of carpet has been rolled up, it shall be misted with amended water and sealed with two layers 6 mils plastic sheeting. The sealed carpet section shall be transported out of the facility to an approved waste container for appropriate disposal.**
- 8. After all carpeting has been removed, all surfaces shall be cleaned using wet methods and HEPA vacuum.**
- 9. The two layers of 6 mil plastic sheeting covering all penetrations and stationary furniture shall remain in place until the area has undergone general cleaning and passed a visual inspection.**

AIR MONITORING PROTOCOL

- 1. Inside work area air samples will be collected during cleaning and carpet removal phases of the project to evaluate any asbestos fiber release from the work area. These samples analyzed via TEM (AHERA PROTOCOL).**
- 2. If the air samples collected during cleaning/removal activities exceed AHERA clearance criteria, the area will be re-cleaned, and aggressive air monitoring will be performed and samples will be analyzed by TEM.**

Lead dust in schools in Lower Manhattan

- Concern has been voiced about elevated levels of lead dust in lower Manhattan schools as a consequence of the WTC disaster. Specific concerns about elevated dust lead levels on floors and windowsills at PS 89 and Stuyvesant H.S. have been expressed.
- Lead exposure from deteriorating interior lead-based paint that is common in older buildings remains the most significant contributor to childhood lead poisoning. Lead-based paint that is in poor condition generates lead dust and settles on floors and other horizontal surfaces in buildings. Young children (particularly 1 and 2 year-olds) are at highest risk for lead poisoning since they crawl on the floor and regularly engage in hand-to-mouth activity.
- Since PS 89 and Stuyvesant H.S. are new buildings, they do not contain interior lead-based paint and it is not likely that lead hazards will be generated from inside the schools.
- Potential sources of lead from the collapse of the WTC towers include lead-acid batteries that were used for back up power and some decorative surfaces on the exterior crown of the towers.
- Since the collapse the U.S. Environmental Protection Agency (EPA) has been collecting environmental samples to monitor contaminant levels in the environment. Based on the sampling conducted around the WTC, it does not appear that the disaster has made a significant contribution to increasing the amount of lead in the environment.
- It is not uncommon to find elevated levels of lead in urban soil due to past use of leaded gasoline and lead paint. Exterior soil and dust may be tracked into a building by normal foot traffic. Airborne dust may also be blown in through a window and settle on to a windowsill or desk or other horizontal surface.
- The Board of Education has been conducting regular lead dust wipe testing in lower Manhattan schools to determine if lead is being tracked in or blown into the schools. Approximately 400 samples have been collected from floors and windowsills at PS 89 and Stuyvesant H.S. and approximately 3% of the samples have shown elevated levels of lead in the dust.
- EPA has established acceptable lead-dust lead hazard standards for child-occupied facilities. These standards are 40 micrograms per square foot ($\mu\text{g}/\text{ft}^2$) for floors and 250 $\mu\text{g}/\text{ft}^2$ for windowsills.
- The tests indicate that some lead dust is being tracked in or blown into the schools, which is not uncommon in an urban environment.
- Based on the available data, the risks of exposure to lead hazards for children at PS 89 and Stuyvesant H.S. are low. However, the schools should be regularly cleaned to prevent further accumulation of lead dust.

- 1) Get kick to work on
- 2) EPA will incorporate HVAC into their
Scope of work for entire

~~CECA~~
5% Asbestos
95% Fiberglass

155 Franklin St

Add a carbon based filter to help
VAC will it remove Mercury??
JK says it will?

However MM ~~will~~ says wet wiping
will Achieve Some.

clarkby $\Rightarrow$ cleaning common areas

2.5

lyr Tem Ahera

Testing

30 mg

NAME	ORGANIZATION	ADDRESS	PHONE	EMAIL
Judy Duffy ANGE BOURGIGNON	CB#1 SBT	49 CHAMBERS ST 90 BEEKMAN ST	442-5050 267-6190	JUDITH8507@AOL
TONI D'EGIDIO	SOUTHBIDGE TOWNS	90 BEEKMAN ST, ^{NYC} 10038	267-6190	SBTOWERS1@AOL
Bill Hall	Lower Manhattan Lease Tenants	59 Warren St 3 FL NYC 10007	962 5617	WMH@att.net
Eric Wilson	EPA		732 689 0025	wilson.eric@epa.gov
RAY BASSO	EPA	290 Broadway NYC	637-4105	basso.ray@epa.gov
MARK MADDALONI	EPA	290 Broadway NYC	637-3765	MADDALONI, MARK @EPA.GOV
Bonnie Bellow	EPA - Communications	290 Broadway	637-3660	bellow.bonnie @epa.gov.
Kathy Callahan	EPA	290 Bldg	637-3724	callahan.kathy@epa.gov
Michael Gilson	DEP(NYC)	59-17 Junction Blvd	718 595-4418	Michaelgilson@NYC.DEP
Robert Avalloni	NYC DEP	" "	718 595-4418	BOB avalloni@NYC.DEP

NEW YORK ENVIRONMENTAL LAW & JUSTICE PROJECT

member of the Clean Water Network

member of the National Lawyers Guild

315 Broadway, Suite 200

New York, NY 10007-1121

Tel : 212-766-9910

Fax: 212-202-6388

<http://www.nyenvirolaw.org>

Joel R. Kupferman, Esq.;
Executive Director

Concerns

- Determination of the presence of asbestos and other hazardous materials should be conducted through sample collection and laboratory testing.
 - Cursory visual inspections are inadequate to detect contamination.
- Testing and abatement should extend north of the current arbitrary Canal Street boundary and across the rivers into Brooklyn and New Jersey.
- Preliminary testing should follow a systematic grid in which all neighborhoods are tested.
- Upon determination that contamination has been found in a geographic area, a good faith effort must be made to notify area residents of the contamination and cleanup options.
- EPA oversight of DEP contracting.
- EPA oversight of subcontractor cleanup.
- Cleanup must be mandatory for all private apartments and not just upon request.
- Cleanup must include building common areas such as air duct systems
- If mandatory cleanup for all private apartments is not possible, testing and full abatement should be available to all residents upon request.

Documents

- 1) EPA Cleanup Recommendations
 - Joel R Kupferman, Esq., Executive Director of the New York Environmental Law & Justice Project, Kimberly Flynn, Policy Analyst, Dan Halper, Legal Intern
- 2) 150 Franklin Street Testing Results
 - EMSL Analytical, Inc
- 3) "NY Air Hazards Found"
 - The Sacramento Bee February 12, 2002
www.sacbee.com/content/news/medical /story/1622756p-1698856c.html
- 4) "Trade Center Air Held Unprecedented Amounts of Very Fine Particles, Silcon, Sulfates, Metals"
 - Press Release University of California, Davis (2-12-02)
- 4) "Mercury Contamination in the Home"

- McClanhan, Mark A., The Lancet April 13, 1996
- 5) Asbestos Abatement Guideline Detail Sheets EP 1110-1-11 (9-30-97)
 - Part 1, Asbestos Abatement Detail Sheet Instructions, Section 12, Administrative Considerations
 - Department of the Army, U.S. Army Corps of Engineers
www.usace.army.mil/inet/usace-docs/eng-pamphlets
- 6) Letter regarding health concerns at P.S. 89- Particulate Matter, (2-8-02)
 - David O. Carpenter, M.D. Professor
State University of New York at Albany
- 7) 32 South Street Fire House Photo
 - Locker Room Area
- 8) "Evaluation of Two Cleaning Methods fo Removal of Asbestos Fibers from Carpet"
 - Project Summary (4/91) EPA/500/S2-90/063
 - John R. Kominsky, Ronald W. Freyberg, Jean Chesson, and Eric J. Chatfield
- 9) "Method for the Analysis of Carpet Samples for Asbestos"
 - Settled Asbestos Dust Sampling & Analysis (1994), James R. Millet, Ph.D, P.J. Clark, Kim A. Brackett, Ph.D., and R.K. Wheelles