

Councilman James F. Gennaro
250 Broadway, Room 1773
New York, New York 10007

Dear Councilman Gennaro:

This is in response to your letter of August 19, 2003 concerning the U.S. Environmental Protection Agency's (EPA) Indoor Air Residential Assistance Program (Program) related to the September 11, 2001 attacks on the World Trade Center. In your letter you requested specific information to "help the City Council assess the testing and clean up of indoor spaces that were affected by the plume from the World Trade Center attack, and inform the City Council of any environmental and public health impacts, both long-term and short-term, attributed to the attack."

The following are EPA's responses to your specific inquiries regarding the Program:

1. Data that the EPA has obtained from building owners who conducted contamination testing of their respective buildings during the period immediately after 9/11 and conclusions drawn from that data. Please provide copies of any related reports or studies completed by the EPA, as well.

All of the information regarding building owners' testing of their respective buildings as it relates to the September 11, 2001 attacks on the World Trade Center was provided to EPA by the New York City Department of Environmental Protection (NYCDEP) and can be found on the enclosed compact disc entitled NYC DEP Files WTC Clean-up. EPA was able to further confirm the presence of asbestos from this information. The NYCDEP contact regarding this information is Mr. Michael Gilsean at (718) 595-4418. Please also find enclosed EPA's interim final World Trade Center Background Study Report and World Trade Center Confirmation Cleaning Study.

2. Whether or not the EPA possesses documents that specify how many buildings in Manhattan were tested, and how many owners of these buildings checked the ventilation system, in particular?

In addition to the information referred to above, the enclosed table entitled Valid Whole Building Requests provides a list of all the buildings which were tested and/or the HVAC system was evaluated and, if necessary and requested by the building owner, cleaned under EPA's Indoor Air Residential Assistance Program. All of these buildings were addressed by EPA only at the request of the building owner. EPA is not aware of how many owners of buildings independently checked their ventilation system.

3. The standards/protocols employed by the EPA to ensure the integrity and cleanliness of residential heating, ventilation, and air conditioning (HVAC) systems and whether or not these standards/ protocols were made available to residents?

Please find enclosed a copy of the procedures employed by the EPA to ensure the integrity and

cleanliness of residential HVAC systems (specifically, Monitoring Contract Scope of Work, Cleaning Contract Scope of Work, AC/Ventilation System Cleaning Procedures, Exhaust System Cleaning Procedures, Guidance for Completing the Ventilation System Evaluation Form, Ventilation System Evaluation Form, and Evaluation Procedures to Determine the Presence of World Trade Center (WTC) - Related Dust and Debris in Residential Ventilation Systems in Lower Manhattan. These procedures were made available to the public upon request and in most cases through our website at <http://www.epa.gov/wtc/>.

4. The enforcement measures employed by the EPA to ensure that owners of residential buildings conducted contamination assessments of their respective HVAC systems. If so, how did the EPA determine the integrity of the contamination assessments?

EPA did not employ enforcement measures to ensure that owners of residential buildings conducted contamination assessments of their HVAC systems. EPA's Indoor Air Residential Assistance Program afforded, on a voluntary basis, building owners south and west of Canal, Allen and Pike Streets, river to river, the opportunity to request our assistance to evaluate and, if necessary, clean their building HVAC system.

5. The measures the EPA adopted to prevent recontamination by way of carpet removal in the apartments and common areas of residential buildings?

When residents or building owners requested carpet removal as part of the EPA Program, recontamination by way of carpet removal was prevented by wetting the carpet and then removing it prior to cleaning and/or testing the individual common areas and apartments.

6. Whether the EPA required owners of residential buildings to clean up their entire building? If not, how did owners assure the EPA that safeguards were taken against recontamination of apartments where certain apartments were thoroughly cleaned and others were not?

EPA's program was strictly a voluntary program for occupied residential buildings and apartments south and west of Canal, Allen and Pike Streets, river to river. Those residential building owners and apartment owners/dwellers who requested assistance under EPA's Program received our assistance accordingly. Based on the voluntary nature of the Program, EPA did not receive or request any assurances from building owners.

7. Data that the EPA has compiled from its HVAC ventilation system clean up program, as well as any related written reports.

Based on building owners' requests, EPA evaluated 110 building HVAC systems, determined that 33 of these systems were impacted by the collapse of the World Trade Center, and cleaned 28 of these systems. Five of these impacted systems were not cleaned because the building owners decided to withdraw from EPA's Program. The table described in #2 above specifically identifies each of these buildings. Please find enclosed all of our reports related to our work performed on HVAC systems.

8. Whether the EPA adjusted cleaning and toxin removal standards/protocols to reflect the peculiarities of each type of HVAC system?

The procedures and guidelines described and provided in response to #3 above were uniformly applied to each HVAC system evaluated and cleaned under EPA's Program.

If you have any further questions, please let me know or have your staff contact Peter Brandt, Chief for Intergovernmental Affairs, at 212-637-3657.

Sincerely,

Jane M. Kenny
Regional Administrator

Enclosures