



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

April 9, 2002

The Honorable Daniel Doctoroff
Deputy Mayor for Economic Development
City of New York
New York, New York 10007

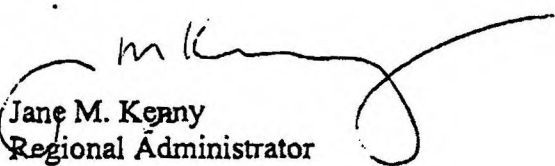
Dear Deputy Mayor Doctoroff:

It was a pleasure to meet with you last week to discuss our mutual interest in helping residents and businesses in lower Manhattan affected by the World Trade Center disaster.

At your request I am enclosing a list of EPA's indoor air objectives and proposed schedule of activities for the coming weeks and months. The list notes the local, state, and federal agencies that should be involved in these activities and includes a proposed schedule for reaching each objective. As you will see, there are many projects on which I hope that EPA and the City can work together to complete. I've noted, by underlining in the attachment, a few key actions for which we need NYC support in the immediate future.

I will call you to discuss this information early next week once you have had a chance to read it. I believe we can share in this critical effort to give people peace of mind as they live and work in lower Manhattan. Thanks again.

Sincerely,


Jane M. Kenny
Regional Administrator

Enclosures

April 9, 2002

Proposed Schedule of Activities Related to EPA's Indoor Air Objectives:

April, 2002

- Begin Cleaning of Building Exteriors
- Establish of a Hotline for Cleaning Concerns
- Establish a Program to Provide Assistance to Individuals/Businesses with Cleaning Concerns and Begin Implementation
- Identify of Scientific Advisors
- Initiate of EPA Peer Review/Consultation Process
- Develop Preliminary List of Contaminants-of-Concern and Benchmarks
- Develop Communication Strategy - Need NYC to Complete ASAP

May, 2002

- Begin Cleaning of Unoccupied Buildings
- Initiate Study of Background Levels of Contaminants-of-Concern - Need NYCDOH to submit proposal to FEMA to Assist EPA in Obtaining Access and to Prepare Letters to Residents.
- Initiate Pilot Cleaning of Unoccupied Building to Evaluate Cleaning Techniques
- Develop Database of Existing Indoor Air Quality Data - Need NYC to submit proposal to FEMA to initiate this effort.

June, 2002

- Fill in Data Gaps of Building-Specific Cleaning Status
- Distribute Information on Cleaning Status by Building

July, August, September

- Complete Cleaning of Unoccupied Buildings
- Complete Exterior Cleaning of Building
- Complete Study of Levels of Contaminants-of-Concern
- Complete Pilot Cleaning of Unoccupied Building to Evaluate Cleaning Techniques
- Complete Peer Review
- Develop Final List of Contaminants-of-Concern and Benchmarks

EPA's Indoor Air Objectives:

Cleaning of Building Exteriors

EPA is in discussion with NYCDEP regarding how we can provide assistance to NYCDEP's program to clean the building exteriors in Lower Manhattan. Most likely, we will contribute to NYCDEP's efforts to oversee the contractors as they conduct the cleaning. The objective of this effort is to remove any WTC-related debris that may enter the indoor environment.

Lead: NYCDEP

Primary Assistance: EPA, FEMA

Schedule: ASAP, April. Will take approximately 10 weeks.

Cleaning of Unoccupied Debris-Laden Buildings for Reoccupation

There are a few remaining unoccupied buildings that contain a significant amount of WTC dust near the WTC site. One of the buildings will be cleaned through EPA's pilot effort, but the remaining buildings should be cleaned as soon as possible to prevent decontamination of other structures in Lower Manhattan.

Lead: NYC

Primary Assistance: EPA, FEMA

Schedule: ASAP, May.

EPA?

Establishment of Hotline for Identifying Individuals/Businesses with Cleaning Concerns

NYC should immediately establish a hotline solely for the purpose of recording the names and locations of individuals with concerns regarding the level of cleaning that occurred within their residence/office. The objective of recording these names is to be able to deploy current assistance into the field, and to disseminate future information once we conclude our ongoing investigations to develop final benchmarks and enhance cleaning protocols.

Lead: NYC

Primary Assistance: EPA, NYCDOH

Schedule: ASAP, April

Establishment of a Program to Assist Individuals/Businesses with Cleaning Concerns

NYC should immediately establish mechanisms to offer assistance to individuals/businesses that self-identify as having cleaning concerns. This can be accomplished by initiating a program that may include the following actions:

- 1) obtaining asbestos abatement contractor services that can be made available free-of-charge on an as-requested basis,
- 2) providing funding to individuals/businesses to conduct an asbestos abatement cleaning of their locations, and
- 3) obtaining a contractor to conduct testing of locations, on an as-requested basis, to determine if samples collected meet the preliminary benchmarks being established for determining long-term risk.
- 4) providing HEPA vacuums to interested parties for them to use in cleaning,

Lead: NYC
Primary Assistance: EPA, NYCDOH
Schedule: ASAP, April

Identification of Scientific Advisors

Scientific advisors should be identified to provide advice and counsel to NYC in developing approaches on assessing and cleaning indoor environments. A mechanism will need to be established to compensate the advisors.

Lead: NYC
Primary Assistance: EPA, NYC
Schedule: ASAP, April

EPA Peer Review/Consultation

EPA is identifying a highly respected technical firm which would assist in identifying eminently qualified scientists to conduct peer review and consultation on a variety of aspects of indoor air issues such as establishing contaminants of concern and benchmarks, determining cleaning techniques and selecting analytical techniques.

Lead: EPA
Primary Assistance: NYCDOH
Schedule: ASAP, April

Development of Contaminants-of-Concerns and Benchmarks

The EPA task force is developing a preliminary list of contaminants that are related to the WTC disaster that may still present a concern in residential indoor environments. The task force is also developing criteria that will be used to determine benchmark levels of these compounds which would reflect within reasonable expectation a return to levels that existed before the WTC attack-collapse and therefore reasonable assurance that these contaminants do not pose long-term health risks through the indoor environment.

Lead: EPA
Primary Assistance: NYCDOH, NYSDOH, NYSDEC, ATSDR
Schedule: Preliminary list will be done by April 30, 2002. Final list will not be developed until completion of background study and completion of peer review.

Study of Background Levels of Contaminants-of-Concern

To better evaluate what are significant levels of contaminants-of-concern, EPA and NYCDOH are undertaking a study to establish what may be considered pre-existing levels of these compounds in a NYC indoor environment. This study will involve collection of samples in residential locations unaffected by the WTC-dust. Since the results from this study are needed as quickly as possible, we are planning on conducting a limited study, nonetheless, it should provide useful information for developing final screening criteria. A literature review is also underway to determine if there is existing background urban data for the contaminants-of-concern. The EPA and ATSDR request for this effort has recently been submitted to FEMA. NYCDOH needs to expeditiously submit its request for funding for this project since NYCDOH is the agency responsible for obtaining access to the background locations and informing residents of the results.

Lead: EPA

Primary Assistance: NYCDOH, ATSDR, FEMA

Schedule: Sample collection should begin late-May; a final report is expected by August 31, 2002.

Evaluation of Cleaning Techniques

EPA is undertaking a pilot building clean-up which has as its objective further evaluation of existing cleaning techniques to develop any additional recommendations that might be made regarding the measures needed to reduce the levels of contaminants-of-concern from a residential indoor environment. This clean-up will be conducted in an unoccupied building. EPA has been in the field with OEM and NYCDOB to determine a suitable location for this project. EPA will be submitting a proposal to FEMA the week of April 8, 2002 to conduct the action. OEM will work with EPA to obtain access to the building.

Lead: EPA

Primary Assistance: OEM, NYCDOB, FEMA

Schedule: Sample collection/cleaning should begin late-May, a final report is expected August 31, 2002.

Distributing Information on Cleaning Status by Building

NYCDEP has received over 200 reports from building owners and contractors regarding air monitoring and cleaning status for both commercial and residential buildings in Lower Manhattan. It is imperative that these data be made accessible in a database format in conjunction with other government agency efforts. Because of the amount of effort involved, NYC will need to submit a request to FEMA to begin work on this database. Once the database is established, and using additional information from the NYCHPD, EPA and NYC will be able to designate the cleaning status of the buildings in lower Manhattan, possibly using a three-tiered approach of significant cleaning needed, moderate cleaning needed and no further cleaning required.

Lead: OEM, NYCDEP

Primary Assistance: NYCDOH, NYCHPD, ATSDR, FEMA

Schedule: Unknown, EPA believes this action should occur as soon as possible, May. OEM is currently determining the resources required to conduct this effort.

Collection of Additional Information to Complete the Building-by-Building Designation

It may be necessary to make additional observations to characterize individual buildings if there are significant gaps in the existing data obtained by NYC.

Lead: OEM, NYCDOH

Primary Assistance: NYCDEP, EPA, FEMA

Schedule: Unknown, possibly June/July.

Public Information and Press Activity

Development of a communications strategy that includes press announcements regarding the hotline and the availability of cleaning assistance and testing. The strategy should also include

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establishment of a clearinghouse for public information regarding indoor air quality.
Information collected during the building specific effort would be included in the clearinghouse.
Lead: Deputy Mayor Doctoroff
Primary Assistance: All involved agencies
Schedule: Unknown, April