

Miller's comments

NYC and EPA to assure the public who calls in get properly directed based upon the nature of their questions or concerns. [Should consider consolidating into a single hotline.]

was discussed - needs to be clear-

The assistance will include the following options:

- a) Cleaning within apartments and building common open spaces, followed by air asbestos testing, using trained asbestos abatement contractors. [As worded, this statement indicates that non-professional cleaning, as recommended, was inadequate.] Based on existing data evaluated by OSHA during lower Manhattan indoor clean-ups, OSHA will under appropriate circumstances make a determination (negative risk assessment) that these contractors will not be required to use protective clothing or gear. An oversight function will be designed to assure that if an 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.
- 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. [If limited to airborne asbestos, then sampling needs to be by "aggressive" methods. I don't think aggressive sampling is done in occupied apartments. Can someone check this. Suggest expanding beyond airborne asbestos and include loading data.]
- c) Providing HEPA vacuums to residences who request to perform their own cleaning on an ongoing basis.

Bob

Projected Cost: Needs to be determined. (The March 11 broad mission assignment submittal was for \$80 million based upon a gross estimate of 5,000 apartments requesting clean up and post testing.) Vacuums costs approximately \$400/each. Apartment cleaning with trained contractors is approximately \$14,000/apartment. Testing for asbestos is approximately \$3,000/apartment. Commercial space cleaning and testing is \$6-8 /sq. foot. Total costs will not be available until the information campaign is complete and EPA can determine the extent of what will be required.

Status of Request for FEMA mission assignment: Awaiting initial FEMA feedback.

3A. Establishing Benchmarks for Potential Contaminants of Concern

Using indoor air and bulk sampling test data collected in New York City since 9/11, as well as historic information on contaminants that occur following the collapse of a building and as a result of prolonged fires, EPA will determine what substances pose a potential health risk in lower Manhattan due to the WTC collapse and subsequent fires. EPA will establish benchmarks for each potential contaminant of concern taking into account the background level of each substance. Potential contaminants may be removed from further consideration provided either there is no evidence that a substance exists at a level of concern or if the cleaning pilot demonstrates that wet wiping/mopping and HEPA vacuuming by non-professionals is safe and effective in removing that substance.

[Handwritten scribble]

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

Objective: To eliminate remaining debris/dust 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.

Program: NYC DEP will contract for the cleaning of the exteriors of approximately 250 buildings in Lower Manhattan. EPA, NYCDEP and OSHA will oversee contractors.

Projected Cost: NYC \$10.28 Million

Project Period: April 2002 through November 2002

Status of Request for FEMA mission assignment: FEMA funding approved pending resolution of indemnification issues..

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

Objective: To expand the data available on airborne asbestos in the indoor environment.

Program: EPA will collect airborne asbestos samples within a variety of residential **and commercial** 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 these 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 residents are effective. . EPA will work with building owners and residents to obtain access for this sampling. This will be distinct from the self identifying program. If sampling determines 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.

Projected Cost: \$3000 per location sampled. Estimate _____ locations.

Status of Request for FEMA mission assignment: Awaiting initial FEMA feedback.

6. Identification and Inspection of HVAC Systems in Lower Manhattan.

Objective: To define the HVAC systems in residential **and commercial** buildings in Lower Manhattan which may have been impacted by the debris/dust from the WTC building collapse. In addition, an evaluation will be made of their condition and potential for further clean up requirement.

Program: NYC will identify the residential **and commercial** buildings with HVAC systems in lower Manhattan. EPA will determine if further action needs to be taken to inspect or clean these systems. This effort will be combined with the exterior building cleaning effort.

Projected Cost: To be determined

Status of Request for FEMA mission assignment: Awaiting initial FEMA feedback.

Can we do this?
This is a tricky issue
that is a small component
of the initiative
not it

Central Circulation

*plus is not well
under and notes
back of confidence
to the public
for #*

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 these 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.

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

Objective: To establish a NYC specific quantitative data set which will enable a better evaluation of pre- 9/11 conditions likely to have existed in Lower Manhattan. This will assist in future evaluation of whether any further clean up advice or action will be necessary.

Program: EPA will sample residences **and commercial buildings** 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. NYCDOH will obtain access agreements and prepare notifications to residents **and workers**. Seven potential indicators of concern have been identified and air and debris/dust samples will be taken.

Projected Cost: \$1.3 million

Status of Request for FEMA mission assignment: Submitted, as revised 4/11/02. Under consideration by FEMA.

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

[The inventory of existing test information needs to be combined with information generated by #5 and #6 above. It is not a "longer term" action. Existing data is being assembled and a draft web-form for indoor asbestos data is expected by the end of the week for internal review.]

Objective: To review and summarize/organize private sector environmental cleaning and sampling data to provide additional information to inform submittal as effectively as possible which will allow for maximum amount of data to be considered by EPA, ATSDR, NYSDOH and NYCDOH when evaluating effectiveness and protectiveness of cleaning techniques and the potential for any increased long term risk to the public posed by indoor environments. About sampling results and cleaning efforts to assist in the determination of the adequacy of cleaning.

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 format will enhance ability to assess potential concerns related to indoor air environment.

Projected cost: \$500,000 has been discussed. NYC presently developing project specifics and cost estimate.

Status of Request for FEMA mission assignment: Discussions held with FEMA; NYC developing a proposal for submittal.

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.