

EPA Timeline

1/28/03

Cleaning to be done in 11 Weeks
(Mid April)

1. Implementation of cancellation policy
 - a. Meeting with monitoring contractor/quad leader by 2/3/03
 - b. Clearly explain policy to all contractors by 2/3/03
 - c. Assist monitoring contractors in developing spreadsheet of all calls for tracking purposes
 - d. All residents to be called by 2/15/03
 - e. Initial call – send letter right away
 - f. Simultaneous letter/3 additional calls within same 2-week period
 - g. No response within two-week period/official cancellation
2. Total number of common spaces and apartments need to be delineated (within building requests)
3. All HVAC/Exhaust inspections must be done by February 22nd (3 weeks)

Refer to attached chart

4. Group all buildings by street address/proximity
5. Apartments/common spaces multiple

Refer to attached chart

6. Reinforce policy that residents cannot change from test only to test and clean
7. License/Access Agreement Policy
8. Send cover memo to building owner with timeframe when access agreement if due (2 weeks)
9. Need to get access agreements quickly (within 1 week) in order to continue inspections.

See:
letters
(WTC
inquiries)

February 7, 2003

Ms. Maureen Silverman
40 Harrison Street, #21K
New York, NY 100013

Dear Ms. Silverman,

Your correspondence was forwarded to the Department of Environmental Protection's Bureau of Environmental Compliance for response.

As you know EPA, the lead agency in this endeavor, had extended the program on several occasions. It is their position that the number of extensions through December 28, 2002, was sufficient to allow all residents to register in this cleanup reassurance program.

Thank you for correspondence related to this matter.

Very truly yours,

Michael Gilsenan
Assistant Commissioner

Proposal to Expedite

2/19/03

Proposal to Expedite Clean-up of Indoor Residential Units/Common Spaces

Facts:

- HVAC evaluation process taking much longer than anticipated - issues with access agreements and mechanical drawings
- Common spaces show no evidence of residential WTC dust
- HVACs to be tented in public spaces eliminating the possibility of cross contamination
- Exhausts to be tented in areas of brush penetration; all other open vents to be sealed during the cleaning process
- Currently at 400 apartments per week, it will take 8 to 9 weeks to complete the project. Stock of apartments available for cleanup does not come close right now, to reach 400 per day, thus will take longer than 9 weeks to complete.
- Release all apartments and common spaces for cleaning, while HVAC evaluations are being conducted

Justification:

- Since routes of possible contamination will be sealed, the possibility of cross contamination to a common space/residential unit already cleaned is eliminated.
- This will allow the stock of apartments/common spaces to reach its maximum quickly, thus ensuring the contractors the maximum number of apartments to call, schedule and clean as per the contract.
- This will effectively reduce the present time span of the project, despite our many efforts to shorten the process.

Precedent

- The building at 222 Rector Street has had all the apartments cleaned, however, recently the owner has changed his mind regarding cleaning HVAC/exhausts and EPA has agreed to an HVAC/exhaust cleanup. In effect, this building will be cleaned using the same methods and procedures noted above.

See
Buildings

March 10, 2003

Mr. Carl E. Geffken
Assistant Commissioner / Administration
Department of Investigation
80 Maiden Lane
New York NY 10038

Dear Mr. Geffken:

In response to your telephone call about indoor air quality at your offices at 80 Maiden Lane, the Department of Environmental Protection, Bureau of Environmental Compliance, Division of Emergency Response and Technical Assessment, conducted air sampling on the five floors occupied by your agency.

We conducted air monitoring for total particulate on floors 16, 18 and 25 and total fiber on floors 17 and 19; the sample results were below the level of detection for each test.

We have attached copies of the laboratory results for your file.

Sincerely,

Michael Gilsenan
Assistant Commissioner

XC: M. Fawzy
I. Catanzaro
File. 03H03040294

6/16/03

New York City Department of Environmental Protection
Asbestos Control Program

66 John Street, Manhattan
9th and 10th Floors

Commissioner Ward received information from NYCDEP employees concerned about the results of a carpet sample taken from the 10th floor of 66 John Street. The Commissioner contacted the Bureau of Environmental Compliance (BEC) and the Office of Environmental Health & Safety Compliance (OEHSC). OEHSC then provided the BEC Asbestos Control Program (ACP) with the result of the carpet sonication sample. The sample result was an excerpt of a report which neither ACP, OEHSC nor the Commissioner has received. The sample result indicated a concentration of 393,061 structures/cm². Carpet sonication is not a New York State Department of Health approved method for the collection and analysis of asbestos-containing or asbestos-contaminated material. Further, this sampling method has not been adopted as a Federal, State or local standard.

A single direct relationship between asbestos-containing dust and potential human exposure has not been established. Although, a direct relationship between dust levels and exposure has been documented for other contaminants, e.g. lead, this relationship has not been documented for asbestos fibers probably due to the unique aerodynamic aspects of asbestos fibers. Asbestos fibers do not pose a health hazard unless the fibers become airborne and are inhaled.

The ACP had responded to calls from concerned building occupants and reviewed air and bulk sample results received from the building owner. ACP then conducted site visits at the building. These site visits did not disclose the presence of visible debris within the interior of the building. According to the information in the ACP records, 54 air samples were collected within the building on September 14th, 15th, and 16th, 2001. The samples were analyzed by phase contrast microscopy and were each below 0.01f/cc. Ten bulk samples were collected from exterior surfaces during early July 2002. The results indicated the material was not ACM. On November 1, 2002, 9 additional bulk samples were collected from building exterior surfaces. The results indicated the material was not asbestos-containing material.

As a result of complaints, the building owner initiated air sampling on March 7, 2003. The air samples were collected on the 9th, 10th, and 11th floors. The samples were analyzed by phase contrast microscopy (PCM) and transmission electron microscopy (TEM). The samples were below the clearance levels. Specifically, the clearance level for PCM samples is 0.01 f/cc and for TEM samples is 70 s/mm². The ACP asked for and reviewed the data from the air samples after it became aware of complaints regarding the above premises.

Although, the results of several previous site visits and the review of submitted results did not indicate a requirement for further action, the Commissioner requested the building owner to re-clean the carpeting. The building owner agreed to the request and initiated cleaning of the carpet using wet extraction procedures. The cleaning began on April 1, 2003 and is expected to be completed by April 4, 2003. BEC will perform air sampling on April 4, 2003. The results will be evaluated using the clearance criteria indicated above.

4/3/03

6/16

M E M O R A N D U M

TO: Gerould J. McCoy
Agency Compliance Officer
Office of Environmental Health and Safety Compliance

FROM: Robert C. Avaltroni
Deputy Commissioner
Bureau of Environmental Compliance

DATE: June 16, 2003

SUBJECT: 66 John Street

Please find the additional information related to 66 John Street.

Carpeting was cleaned with water extraction methods. Water extraction methods include the use of industrial-quality HEPA-filtered vacuums with power extraction. Water is sprayed on the carpet surface. The carpet fibers are agitated and the water is extracted from the carpeting.

The USEPA tested various cleaning methods after the WTC and found that the use of standard cleaning methods of vacuuming and wet wiping significantly reduced levels of WTC-related contamination with each cleaning event and was successful in reducing concentrations.

Information provided to the DEP Asbestos Control Program (ACP) Enforcement Staff indicated the carpets were cleaned several times between September 11, 2003 and April 2003 through the use of carpet shampoos and water extraction. In addition, the staff was informed that the building is on a periodic cleaning program cycle. Specific dates are not available in the ACP files, but should be available from the building owner and/or cleaning contractor. The last set of cleaning at DEP's request began on April 1, 2003 and was completed on April 4, 2003.

The air sampling was performed on April 5, 2003 rather than on April 4, 2003 as had originally been projected. The sample results are attached for your perusal.

Please feel free to call me if you need additional information.

Attachments

DRAFT

July 16, 2003

also 8/4

Mr. Walter Melnick
Federal Emergency Management Agency
Federal Recovery Office
80 Centre Street, 3rd Floor
New York, NY 10013

Dear Mr. Melnick,

The US Environmental Protection Agency (EPA) and NYC Department of Environmental Protection (DEP) and are in receipt of the analytical test results supplied to the Federal Emergency Management Agency (FEMA) by residents of 114 Liberty Street via Congressman Jerrold Nadler's office. These samples were collected and analyzed in April 2003.

As part of the EPA, FEMA and DEP voluntary clean-up program for residential units in lower Manhattan, DEP was responsible for the clean-up of World Trade Center (WTC) dust and debris from unoccupied, uncleaned residential buildings; one of which was 114 Liberty Street. EPA had oversight responsibility for this part of the program.

DEP conducted the clean-up following the guidelines set forth in Title 15 Chapter 1 of RCNY (Asbestos Control Program) and developed a specific scope of work for this project that was developed and ultimately accepted by all interested parties. Sampling was done for contaminants of potential concern following EPA protocols established specifically for WTC dust. The analytical results were compared to health-based benchmarks for contaminants of potential concern established by EPA's Interagency Indoor Air Task Force. The contaminants of potential concern included: asbestos, lead, dioxin, PAHs (polycyclic aromatic hydrocarbons), fibrous glass and crystalline silica.

In April of 2003, DEP sent the Board of Directors a letter informing them that the clean-up activities had been completed as per the clean-up and monitoring specifications, as well as the access agreements for 114 Liberty Street. Attached to the letter were copies of correspondence from EPA regarding the clearance levels for contaminants of possible concern and enclosures summarizing the analytical results. Included in the letter was reaffirmation of Asbestos Control Program staff's observations whereby pre-existing building materials were identified as having suspect asbestos-containing material (ACM). Those materials included thermal system insulation, surfacing material and vinyl asbestos tiles. Copies of DEP's April 24, 2003 and EPA's April 18, 2003 letters are attached for your perusal.