

Gilsenan, Michael

From: LaPosta.Dore@epamail.epa.gov
Sent: Wednesday, November 27, 2002 11:04 AM
To: Gilsenan, Michael; Radhakrishnan, Krish
Cc: callahan.kathy@epamail.epa.gov; basso.ray@epamail.epa.gov
Subject: notes from our meeting yesterday



wtchvacmtg112602
.wpd

let us know if you have any questions reagrding this summary, thanks
see you monday, the meeting will be at 11:00 in room 25a

(See attached file: wtchvacmtg112602.wpd)

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Notes from 11/26/02 meeting of EPA/NYCDEP regarding HVACs

Existing/Already Inspected:

1. EPA reviews HVAC evaluations for completeness
2. EPA/NYCDEP review building information where available
(NYC drafting letter to send to building owners to get reports)
3. Ray and Krish consult to make determination on appropriate course of action
4. If cleaning is needed, Krish contacts quad cleaning contract to determine if cleaning can be done by unit cost pricing by existing cleaning contractor
5. If cleaning contract cannot do cleaning, NYC determines another way to get cleaning done

Exhaust Systems Issues:

1. If it is determined cleaning is necessary, EPA/NYC will operate under the principle we will do the best we can where we have limited access - we will coordinate with building management to see if we can get in to do the cleaning, and will clean within those apartments and will clean fans on top but may not be able to clean entire risers due to problems gaining access
2. EPA will review monitoring data from apartments in the building that are part of the cleaning and/or testing program
3. In cases where there may be conflicting information between the building owner's report and the monitoring contractor's HVAC evaluation, Ray and Krish will consult and determine the appropriate course of action.

Approach for the Present

(Present - Interim between evaluations already conducted and the completion of the activities outlined in Step 1 and Step 2 below.)

1. In quads B, C and D the subcontractors have been approved
2. Contractors need to submit all outstanding reports to EPA
3. Once EPA has received satisfactory reports, evaluations can be restarted at a rate of 5 per quad, once 5 are completed the contractors should stop conducting evaluations and complete the reports for submittal to EPA.
4. EPA will provide to NYCDEP an update on the whole building request status including information on evaluations completed, reports received, and recommendations made by the contractor
5. NYCDEP will follow-up with building owners to get reports on work they did particularly in Quad D.
6. EPA and NYCDEP will monitor Cole's subcontract for effectiveness and producing reports of inspections.

Approach for Future HVAC Activities - Step 1

Consultants and EPA and NYCDEP meet on Monday, December 2 to discuss future program approach. Objectives of the meeting are to:

1. Further refine the evaluation checklist to result in a more thorough visual inspection of duct work, will include -
 - Relating information from the scope to the checklist
 - Eliminating bulk sampling from evaluation
 - Reformatting checklist so it can better stand alone as a report
2. Discuss the relationship between the observation of dust and the recommendations for cleaning the system. (Does whole system need cleaning if dust is observed at intake?)
 - Try to identify areas of agreement.
3. Discuss cleaning techniques, will include -
 - Determining need for encapsulation
 - Determining if NADCA cleaning requirements need supplementing to conduct cleaning related to WTC debris, and if so, how?

Approach for Future HVAC Activities - Step 2

Provide direct instruction to field staff and contractors on revised evaluation approach.

Approach for Future HVAC Activities - Step 3

Provide oversight of program through independent HVAC contractor to be obtained through competition by NYCDEP. Oversight components include:

- A. 25% of all HVAC evaluations, and HVAC/exhaust system cleanings of buildings less than 10 floors will include on-site oversight by the independent contractor.
- B. In addition, 100% of all HVAC evaluations, and HVAC/exhaust system cleanings of buildings 10 floors or more will include on-site oversight by the independent contractor.
- C. The independent contractor will review the reports and sign that they have reviewed it and will indicate whether or not they have included comments
 - (Before the report is sent to EPA, the MC will need to coordinate with the independent contractor to have the independent contractor review the report.)

Approach for Future HVAC Activities - Step 4

EPA reviews the HVAC evaluation reports and consults with DEP to determine the appropriate course of action. If it decided cleaning is needed, Krish will contact the quad cleaning contract to determine if cleaning can be done by unit cost pricing by existing cleaning contractor. If the cleaning contract cannot do cleaning, NYC determines another way to get cleaning done.

Approach for Future HVAC Activities - Step 5

Cleaning occurs consistent with guidelines developed in Step 1, and oversight outlined in Step 3.