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Anthony Ponzio
Merrill Lynch
WFC North Tower
250 Vesey Street, NY, NY

**Re: Nomura Occupied floors 17-22 - Asbestos Cleanup Procedures & Air Sampling
Results for the Cleanup of the WTC disaster - 2 World Financial Center, South
Tower**

Tony:

As requested, enclosed herein is a summary of the cleanup protocols used at the 2 WFC, South Tower.

Due to the complexities of the project it was necessary to divide the cleanup into three phases. Phase I, II & III procedures are described in detail below. Phase I and Phase II procedures described below have been completed for Nomura occupied floors 17-22. All cleanup phases were conducted by trained, certified asbestos handlers and supervisors. GPS Environmental Consultants, Inc., a licensed asbestos consulting firm, monitored work activities and conducted asbestos air sampling during the three phased cleanup procedure. Asbestos air sampling was conducted during the performance of each cleanup phase. Post/Final asbestos air sampling was conducted at the conclusion of each phase. All Post/Final sample analyses results were required to be below 0.01 f/cc for Phase Contrast Microscopy (PCM) analysis and less than 70 Structures/mm² for Transmission Electron Microscopy (TEM) analysis which is acceptable for re-occupancy in accordance with Federal, State and NYC Asbestos regulations.

Bulk Sample Collection and General Cleanup Criteria:

A NYC Investigator collected 15 bulk samples from representative floors on the east side of the facility where windows were broken and bulk/gross debris was observed. The samples were analyzed using the PLM, (polarized light Microscopy) analytical technique. Three Samples on three separate floors had results of asbestos present in amounts greater than 1%. Based on these results all bulk/gross material was treated as asbestos containing material, (ACM). The east side of facility from the street level through floor 22 was most heavily damaged with many broken windows and large amounts of debris. Floor 23 and above exhibited much less damage having fewer broken windows.

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Pg 1 of 4

The east side of the facility, where windows were broken and gross material entered was separated from the rest of the floor by polyethylene isolation barriers. Negative air machine were installed to assist in controlling fiber release from the east side. Cleanup work on both the east and west side of the facility was performed by a licensed Asbestos Abatement Contractor utilizing certified asbestos handlers and supervisors. GPS Environmental, a licensed Asbestos Air Monitoring firm, performed asbestos air sampling. Sampling was performed during each phase of the cleanup operation and at the conclusion of each phase post/final asbestos air sampling was performed.

Phase I Cleanup Procedure Overview

This was the initial cleanup phase of the project. After the procedures listed below were completed the floor was cleared for occupancy without the use of respiratory protection and other personal protective equipment. Access was limited at this time to essential personnel. Personnel required to complete assessments. Personal items and equipment not disposed of on the eastside was not to be disturbed, handled or removed from the facility until a detailed fine cleaning of these items could be performed, since these items may have been contaminated with asbestos containing material. Personal items, files, etc., located on the west side also suspected of containing dust contaminated with asbestos fibers were scheduled to be fine cleaned as described in the Phase II cleanup procedure overview discussed below.

Eastside cleanup and other heavily impacted areas containing gross debris contaminated with ACM, (asbestos containing materials)

- (1) A modified containment was setup to isolate gross debris containing areas.
- (2) Negative air machines were installed within the containment to help control fiber release,
- (3) Remote decontamination units were erected and used by asbestos abatement personnel.
- (4) 1st cleaning - Gross debris was doubled bagged and disposal of as asbestos waste.
- (5) 2nd cleaning - the exterior surfaces of all items were HEPA vacuumed and wet wiped.
- (6) All Fabric materials and ceilings were removed and disposed of.
- (7) Personal items were cleaned of gross material and boxed until a decision was made as to disposal or cleaning.
- (8) Equipment was considered contaminated and disposed of or wrapped in poly until direction was given.
- (9) Prior to Post/final asbestos air sampling all areas were visually inspected by GPS personnel and re-cleaned was performed as required.
- (10) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. In accordance with Federal, State and Local asbestos regulations re-occupancy criteria, all post samples were required to be below 0.01 f/cc for PCM analysis and less than 70 Structures/mm² for TEM analysis. If any sample result was at or above these limits then the area

was re-cleaned until all sample results were below these limits. Isolation barriers were removed only after passing this post sampling criteria.

Westside cleanup and other areas containing dust

- (1) 1st cleaning – all surfaces were HEPA vacuumed and wet wiped by asbestos certified handlers and supervisors.
- (2) All areas were inspected by GPS personnel and re-cleaned as necessary.
- (3) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm² for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.

Phase II Final Cleanup Procedure Overview - After the procedures listed below were completed the floor may be reoccupied with no restrictions.

A final, detailed fine cleaning was performed by certified asbestos workers under the direction of a specialized disaster recovery firm. The space walls, floors, furniture and personal items were finely cleaned to remove residual dust. All rugs are shampooed to remove contaminants.

Asbestos Final-clearance air sample collection and analysis

- (1) Asbestos air sample collection and analysis
 - a. PCM, Phase Contrast Microscopy and TEM, Transmission Electron Microscopy samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm² for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.
- (2) Asbestos wipe sampling was collected from surfaces in representative locations and analyzed for the presence or absence of asbestos using the TEM qualitative analytical technique. To be acceptable all results were required to be reported as absent or negative for asbestos present.

Phase III Procedure Overview – The ventilation ductwork was inspected by a trained HVAC specialist. Areas determined to be contaminated were cleaned by a certified duct cleaning firm. All fresh air and compartmental filters were replaced. Both the upper and lower fresh air fans were turned on after filter replacement, cleaning and inspections were complete. As a measure to ensure a safe environment for all occupants, GPS conducted asbestos air sampling for each floor for a 24-48 hour period.

Asbestos Final-clearance air sample collection and analysis

- (1) **Asbestos air sample collection and analysis**
 - a. PCM, Phase Contrast Microscopy and TEM, (Transmission Electron Microscopy) samples were collected by GPS, a Licensed asbestos consulting firm.
 - b. All post samples were required to be below 0.01 f/cc (PCM) and less than 70 Structures/mm2 for (TEM). If one sample was at or above these limits then the area was re-cleaned until all sample results were below these limits.

Tony, approximately 62,000 PCM and 31,000 TEM asbestos samples have been collected and analyzed to date. Post Sampling for Phase III is completed for the upper fresh air bank, floors 17 through the Penthouse and for the lower fresh air bank, floors C3 through 16.

Sincerely Yours,



Gregory P. Smyth
President GPS