Beginning September 12th , DEP has operated a network of outdoor (or "ambient") fixed air monitors that have been used for monitoring asbestos levels. There are monitors at 37 locations as of today. The locations are shown on the map. The map and all sampling results to date from the sites shown on this map are on DEP's website: www.nyc.gov/dep.

The monitors capture air samples that are tested for the presence of fibrous material such as asbestos. The samples are tested using the PCM method [DEFINE]. The PCM sampling method does not actually show the presence of asbestos; PCM shows the presence of some type of fibrous particle. PCM-tested samples that show more than 0.01 fibers per cubic centimeter are re-tested using the TEM test [DEFINE]. The TEM test shows whether or not the fibers collected in the sample are actually asbestos fibers.

There is no national standard for asbestos in OUTDOOR AIR. There is a national standard for asbestos in indoor air. That standard is 0.01 fibers per cubic centimeter. It was developed to establish what amount of asbestos is considered safe in a confined environment where people live and work, breathing re-circulated air hour after hour. Used as a benchmark for outdoor air, the standard is very conservative. If there were a standard for ambient air, it would be much higher than 0.01.

Based on over three/four/five??? hundred samples tested using PCM, and [HOW MANY] samples tested using TEM, public health experts are very confident that asbestos levels in ambient air outside of the restricted zone do not pose a threat to human health. Short-term exposure to asbestos, even at levels much higher than 0.01, carries an extremely low risk of causing asbestos-related illness.

Areas were not open to the public until TEM number was below the NAAQS standard

DEP's monitors are all outdoor. At this point, there are no stationary monitors in place within buildings. Judging from phone calls, conversations, and comments at community meetings, there are many individuals who are not clear on the division of clean-up and testing responsibilities inside of buildings. I would like to re-state a few basic facts regarding cleanup.

Before allowing occupants in any residential or commercial building near the Ground Zero [MORE SPECIFIC?], the City required building owners to take these steps:

- Assess the building's structural strength and stability;
- Restore gas and electrical service;
- Restore building water service, including flushing, re-filling and cleaning roof tanks as necessary;
- Assess the presence of hazardous materials such as asbestos, and remediate as required under applicable regulations;
- Inspect, clean and repair mechanical and HVAC systems.

Although city, state and federal agencies have provided oversight and guidance, "indoor tasks" have been and remain the responsibility of building owners and occupants. For

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example, many building owners needed to remove asbestos-containing material from areas of the building under their control: exteriors, facades, hallways, foyers, laundry rooms and other public areas. New York City's Asbestos Control Program (ACP) regulations require building owners and managers to use individuals licensed by the City and the New York State Department of Labor as asbestos investigators, asbestos handlers and asbestos workers[WHAT OTHER CATEGORY]. The regulations also require "clearance" air sampling prior to allowing public access to any area that was the site of asbestos-related work. [FOR THE MOST PART? WITH SOME EXCEPTIONS] It was DEP's experience that building owners cleaning up after September 11th followed these regulations. Because the work was done under expedited schedules, in some cases building owners did not submit notifications in advance, as the regulations would normally require. In the vast majority of cases, where DEP observed some work that was improperly or incompletely done, building owners responded to DEP enforcement staff quickly and appropriately. As was the case before September 11th, if any person believes that asbestos is present at a worksite, or at any other site, and is not being properly handled, he or she should call (718) DEP-HELP and we will send an inspector to investigate.

A remaining source of concern for residents in lower Manhattan has been the clean-up within private apartments where building owners do not, generally, have any authority or responsibility to conduct clean-ups. Unlike building owners, who have experience in hiring and supervising contractors with the appropriate qualifications and licenses, apartment-dwellers often lack this professional experience and have, understandably, become confused and frustrated about how to handle this extraordinary situation. In response, my colleagues at the Department of Health developed a factsheet, "Recommendations for People Re-Occupying Commercial Buildings and Residents Re-Entering Their Homes." This fact sheet, along with a few others on related topics, have been distributed very widely throughout lower Manhattan. These fact sheets offer general information on air quality issues as well as practical, "how-to" information on dealing with dust, debris and other potentially hazardous conditions that residents faced as they returned to their homes.

Continuing concern about indoor air quality has prompted a collaboration with the United States Agency for Toxic Substances Disease Registry [IS THAT A NAME] which we will discuss later in the presentation.

Finally, I have a few words concerning the potable water supply and the marine waters that surround the City. I'll discuss the marine waters first.

As a result of the September 11th attacks, DEP and EPA were concerned that rainwater washing off Ground Zero and into the sewers and the harbor would be highly polluted. As Chairman Michels knows, Manhattan's sewers – as well as most City sewers -- are combined sewers, meaning rainwater flooding into the sewers from the streets ends up in the same pipe as the sanitary flow. During a rainstorm, a percentage of this combined flow ends up at a treatment plant, and the remainder of the combined flow is discharged into surrounding waters through outfalls located at the bulkheads. In the case of lower

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Manhattan, the combined sewers serving that area lead to a very large pumping station at on East 13th St. From there, the sewage is pumped into a pipe that goes under the East River to Greenpoint, Brooklyn where the sewage is treated at the Newtown Creek wastewater treatment plant.

DEP routinely samples raw sewage going into the Newtown Creek plant, and treated effluent coming out of Newtown Creek, several times a day. We also regularly take samples from open waters at various locations in New York Harbor, including off the Battery. DEP tests these samples for "conventional parameters," such as temperature, pH, dissolved oxygen, suspended solids and coliform. These conventional parameters have remained within their normal range since September 11th.

Using the more sophisticated testing capabilities that EPA has its disposal, beginning September 11th their staff immediately began running tests for "unconventional parameters" on samples of Ground Zero run-off, harbor waters, and sewage. These unconventional parameters include PCB's, dioxin, asbestos and other organic chemicals and contaminants that the City's marine water quality laboratories do not routinely test for. Initial runoff samples taken from Rector Street showed elevated levels of PCB's, dioxin, asbestos and metals. Follow-up samples showed concentrations of these substances below levels of concern. Samples of water taken from the harbor, and samples of effluent from the Newtown Creek plant also show the presence of "unconventional parameters" at levels too low to be of concern.

Finally, let me reassure all New Yorkers that continuous sampling of the drinking water supply at the reservoirs, in the aqueducts, and within the City's distribution system have shown all contaminant levels to be within the normal range, and below levels of concern.

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NYCDEP Comments on the 10/18 Draft of the Indoor Air Sampling Proposal

We understand that consideration is being given to revising the sections pertaining to outdoor/ambient sampling. Would an alternative approach be to incorporate the outdoor sampling objectives/goals for this study into the Ambient Monitoring Plan that EPA is developing? We also understand that language to describe the indoor air concentrations and their potential health implications is under development.

The following comments are mainly for clarification purposes.

In the questionnaire for occupants you may want to consider adding questions about:

1) Was the area subject to a special cleaning because of the WTC disaster? Describe as in # 3 what was done.
2) What is the frequency and type of routine cleaning done in the area of concern? Describe as in #3.
3) What is the number of routine cleanings done in the area since 9/11?
4) In #8, add has the filter been cleaned since 9/11?
5) Before #10-
Are your cooking appliances gas or electric?
If gas, do they have a pilot light?

In the questionnaire for the building operator you may want to consider similar questions to 1, 2, 3, and 4.

In the draft PM discussion for public health officials, you may want to clarify why the PM 10 levels of concern in the discussion is the NAAQS of 150 ug/m3, while the table using the AQI has >155 as the level of concern .

We would like to recommend that the draft "Asbestos 1% rule"piece now be removed from the plan document and perhaps stay as a draft information sheet. We agree that it has been helpful in providing information to the agency staff that have been reviewing the indoor sampling plan.

In the Table "Follow-up Recommendations Based on Sampling Results from ATSDR's Residential Sampling", we think the third scenario is not needed as an asbestos action since it shows that the TEM level is below 0.01. In the second scenario, ~~either~~ eliminate the settled dust reference ~~or have it read greater than detection limit and equal to 1% w/w (PLM).~~

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