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Date: 3/26/02 3:44PM
Subject: Implications of COC clean-up approach

Hi Jim, Jessica, Nancy:

I called but you were not available. I wanted to talk to you about the Task Force's approach to this indoor clean-up issue. I am concerned that you may not understand the implications of Task Force's direction on this. It appears that they are intending to develop a long list of potential analytes for sampling in an indoor clean-up program and will develop clearance guidance for this list. There are problems with this approach:

1. It is not practical or necessary for the clean-up of dust in residences. To reiterate: "if the dust is removed so is the contamination". This advice would not change in instances where dust remains after cleaning. The clean-up methods should be defined and then implemented, sampling can be limited. The list of COC's as it currently stands would result in an unnecessary high cost for analysis of dust and air. The clearance guidance levels would be based on uncertain and potentially unreliable risk assessment techniques for dust. *

2. The current list of COC's contains chemicals that EPA has publicly stated are not a health concern in air as a result of WTC emissions (dioxins, pah's, Cr, lead, silica, and others) based on monitoring data. Including them on a COC list contradicts that message and does not appear to be based on a review of the environmental data. Also, there are issues with "background" levels of many of these COC's. They may be found but may not be WTC related. Also, this list implies "concern" for the chemicals listed. It implies an endorsement by government that these chemicals are health issues related to WTC. This may generate alarm and demands for extensive sampling of dust for COC's by the public.

The clean-up approach needs to be more consistent with the advice the City and EPA have already given. At most a few materials could be sampled for such as bulk dust, asbestos and fiberglass. The latter two are in percent levels in the WTC dust and are simple and inexpensive analyses. We already have indications that the background levels of fiberglass are ND. Sampling for chemicals that may be in microgram or nanogram levels in dust for "clearance" is not practical and potentially misleading.

Thanks, I hope you consider these issues before you accept the direction we appear to be going.

COC's

3 fire related { Dioxin
Lead
PAH's

Bldg rel. { Asbestos
Fiberglass
Refractive ceramic fibers
silica

Tiered Approach

Candidates for deletion off coCs

PCB's
PBDE's
Chromium
Cadmium
Hg
Benzene (VOC's)
mold

PAH's → we don't have much air data on this.