



H.A. BADER
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HOWARD A. BADER, P.E.
President

September 30, 2001

Mr. Edward Sullivan
Director of Operations
B.M.C.C.
199 Chambers Street
New York, New York 10007-1097

Re: Asbestos Testing

Dear Mr. Sullivan,

H. A. Bader Consultants, Inc. performed asbestos and lead testing at 199 Chambers Street on September 28, 2001. The sampling was performed by Howard Bader, P.E. and Richard Massari of H. A. Bader Consultants. This testing was a followup survey to H. A. Bader Consultants testing on September 20, 2001.

H. A. Bader Consultants is licensed by the New York State Department of Labor (DOL) as an Asbestos Consultant. Mr. Bader and Massari are New York City Department of Environmental Protection (DEP) Certified Asbestos Investigators. In addition, Mr. Bader and Massari are Certified by the DOL and United States Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA) Program as Asbestos Air Sampling Technicians, Inspectors, Management Planners and Project Monitors. Mr. Bader has been trained and certified as a Lead Inspector and Risk Assessor by the New Jersey Department of Health. New York State does not have certifications in this area at this time.

Several buildings at and adjacent to the World Trade Center Complex in lower Manhattan were destroyed or severely damaged on or around September 11, 2001. It is common knowledge that some of these buildings had asbestos containing materials and possibly lead-based paint. It is suspected that debris from the damaged buildings became airborne and potentially contaminated areas in lower Manhattan with asbestos fibers and lead dust.

The 199 Chambers Street complex is currently being used to house various members of the rescue and recovery operation. There is concern that these personnel are carrying asbestos and lead contamination on their clothing when they return to the building.

H. A. Bader Consultants test results from September 20, 2001, and report dated September 21, determined there was no significant evidence of a potential asbestos and/or lead related health concern in the 199 Chambers Street Complex. H. A. Bader Consultants scope of work on September 28, 2001, was to repeat the testing in select areas to insure that asbestos and lead levels remain non-problematic. The college is scheduled to reopen October 1, 2001.

Lead Testing

The U.S. Federal Department of Housing and Urban Development (HUD) and the City of New York Department of Environmental Protection (DEP) have established allowable levels of lead dust in residential settings occupied by children. The HUD/DEP clearance level is of $50 \mu\text{g}/\text{ft}^2$. These levels are extremely conservative and apply to buildings where small children (less than six years old) reside or frequently visit.

17 lead dust samples were taken on September 28, 2001. 15 samples were below the level of detection. Two samples from the gymnasium bleachers had detectable lead levels (13 and $20 \mu\text{g}/\text{ft}^2$), however they were within the HUD/DEP guideline levels. Reference the attached laboratory results from EMSL Analytical. The bleachers are used by the rescue and recovery personnel and there is a significant amount of dust and debris present. This testing indicates that significant lead contamination is not present in the building.

Asbestos Air Sampling

13 air samples were taken and analyzed by an accredited asbestos laboratory using transmission electron microscopy (TEM). TEM analysis is very accurate for finding even trace amounts of asbestos fibers present in the air.

The United States Environmental Protection Agency (EPA) has established a protocol for determining whether school areas are safe for re-occupancy after completion of asbestos abatement projects. This procedure is covered by EPA

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40 CFR Part 763, Asbestos-Containing Materials in Schools. The procedures state that the average asbestos airborne fiber level in the abated work area must be less than 70 asbestos structures per square millimeter (AS/mm²).

The laboratory results from September 28, found no asbestos structures present in 11 of the samples. 2 samples (3rd floor south entrance by Bursar and the hallway between the Pool and Gymnasium) had one asbestos structures present and the levels were well below the allowable 70 AS/mm². Reference the attached laboratory results from EMSL Analytical.

Two samples with one asbestos structure present in a total sampling of 13 is considered statistically insignificant. As a precaution, prior to the college re-opening, these areas should be thoroughly wet cleaned.

Asbestos Surface Sampling

The accredited asbestos laboratory analyzed 17 surface dust samples using polarized light microscopy (PLM). None of the samples were identified as asbestos containing materials (ACM). An ACM is defined as a material with greater than one percent asbestos. Levels less than one percent are not regulated.

Two samples (Gymnasium and First Floor South Harrison Street Entrance) were found to have trace (i.e., less than 1%) asbestos content. These areas are heavily used by the rescue/recovery and construction personnel. As a precaution, prior to the college re-opening, these areas should be thoroughly wet cleaned.

Based on the results of the asbestos air and surface dust testing, H. A. Bader Consultants did not find any evidence to suggest a potential asbestos or lead related health concern is present in any area of the building. If you have any questions, please call.

Sincerely,



Howard A. Bader, P.E.
President