

Comments

Page 2, section "Sampling and Analytical Procedures for Lead, PAHs, Dioxin, Fibrous Glass, and Silica - For wipe sampling, the only compounds for which we have used for clearing building are lead, PAHs and dioxin. Fibrous glass and silica have only been used for air. So you could forgo the collection and analysis of fibrous glass and silica using wipe samples.

Page 3, Table 1. - Asbestos should be added to this table with the entry as follows:

Parameter	Description	Sampling Methodology	Analytical Method	Maximum Turnaround Time
Asbestos	Air samples	Collection using NIOSH 7400	Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CRF Part 763 Final Rule (AHERA) [see Attachment 1] and NIOSH 7400 (PCM)	3 days

Page 3, Number 5 - The detection limit for PAHs shall be no greater than 1 ug, which will provide a wipe sample concentration of 1 ug/m2.

Page 3, Number 6 - Samples containing concentrations of specific congeneric analytes (PCDDs and PCDFs) considered within the scope of the dioxin sampling method that are greater than ten times the upper MCLs must be analyzed by a protocol designed for such concentration levels, e.g., Method 8280. Analytical results shall be reported using a 2,3,7,8-TCDD toxicity equivalence (TEQ). The TEQs shall be reported four ways. A TEQ which sets non-detects to zero (i.e., TEQ (ND=0), a TEQ which sets non-detects at 1/2 the detection limit (i.e., TEQ (ND=1/2), a TEQ Estimated Maximum Potential Concentration with non-detects set to zero (i.e., TEQ EMPC (ND=0), and a TEQ Estimated Maximum Potential Concentration with non-detects set to 1/2 the detection limit (i.e., TEQ EMPC (ND=1/2). Please see attachment 2 for the format and data to report for dioxin wipe samples.

Page 3, Asbestos Air Sample Collection and Analysis, Number 2 - Asbestos air samples shall be analyzed in accordance with EPA 40 CRF Part 763 Final Rule (AHERA) using a transmission electron microscope (TEM) and reported as shown in Attachment 1. For the TEM analysis, two size fractions should be reported, a fraction that represents fibers >0.5 microns and a fraction that represents fibers >5 microns. The fraction that represents the fibers >5 microns is considered to be the PCM equivalent (i.e., PCMe) that should be compared to the primary clearance value of 0.0009 s/cc. In addition, the asbestos air samples shall be analyzed in accordance with NIOSH 7400 for standard PCM analysis. These results shall be reported on a separate sheet.

Page 4, Numbers 2 and 6 - These two items reference the collection of the air samples and are contradictory in the flow rate. The flow rate in number 2 of 3 liters per minute will result in a 20-hour air sample. The flow rate in number 6 of 10 liters per minute will result in a six-hour air

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sample, which is similar to what EPA is using. My suggestion would be to delete number 2.

Page 5, Clearance Criteria, Clearance table - Change crystalline silica in air to 1 ug/m3 and change PAHs in settled dust to a primary clearance value and change the value to 0.3 mg/m2.

Discussion only, not intended to go into the document - We had discussed on the phone that the PAH number will be changing to 0.15 mg/m2, however this has not been officially adopted at this date, so there is no documentation to support this value at this time. However, in all likelihood, this value will change during the completion of your project, which is why it is imperative that the detection limit for PAHs be set at 1 ug. This will allow us to compare the data collected at 114 Liberty to the new value and indicate compliance. In addition, having a data set for PAHs with a detection limit at 1 ug will add scientific credibility to the clearance of 125 Cedar Street, which did not meet the clearance values due to detection limits and help bolster the evidence gathered at 110 Liberty by EPA.