NYC 9/11 Public Portal Document

ALC ENVIRONMENTAL INCORPORATED

The First Choice for Environmental Testing & Consulting

February 11, 2002

Gateway Plaza Management Corporation
375 South End Avenue
New York, New York 10280

Subject Random Air Sampling-Ambient Air Monitoring **Gateway Plaza Buildings**
Sampling Date(s) January 28, 29, 30, 31, February 1, 4, 5, 6, 7, 8

Gentlemen

Enclosed, please find the report for air monitoring performed at the above referenced address in the 100, 200, 300, 400 500 and 600 buildings. Air sampling was conducted via Transmission Electron Microscopy (TEM) analysis at the request of the owner

ATC Associates (ELAP #10879) analyzed the samples using the Transmission Electron Microscopy (TEM) Methodology. **The results indicated that the areas achieved the acceptance criteria below <70 structures per mm2 set by the federal regulations** (Please See Attached TEM Report)

According to the EPA, *"In evaluating data from the World Trade Center and the surrounding areas EPA is using a protective standard under AHERA, the Asbestos Hazard Emergency Response Act, to evaluate the risk from asbestos in the outdoor and indoor air This is a very stringent standard that is used to determine whether children may re-enter a school building after asbestos has been removed or abated It is based on assumptions of long-term exposure EPA has chosen to use this standard because it is the most stringent and protective, even though it is unlikely that the public will be exposed to asbestos from the World Trade Center site for extended periods of time*

To determine asbestos levels, air filters are collected from monitoring equipment through which air in the school building has passed and viewed through a microscope The number of structures – material that has asbestos fibers on or in it – is then counted The measurements must be 70 or fewer structures per square millimeter before children are allowed inside

There is also a federal standard for asbestos exposure under OSHA, the Occupational Safety and Health Act, which is used to protect workers on-the-job The standard is 1 fiber per cubic centimeter averaged over an eight-hour day To be as protective as possible, EPA is using the school re-entry standard in tests around the World Trade Center

Levels above 70 structures per square millimeter do NOT imply an immediate health threat Asbestos exposure becomes a health concern when high concentrations of asbestos fibers are inhaled over a long period Illness is very unlikely to result from a single, high-level exposure, or from a short period of exposure to lower levels"

The air samples were collected by Alvin B Blake (Certificate #AH 01-03528), Nyron Williams (Certificate #AH98-10213), and Yakhya Benyaguyev (Certificate #AH 95-21191) NY State Department of Labor Project Monitors

Sincerely,

Michael Kamnias
ALC Environmental Incorporated

115 West 30th Street • 11th Floor • New York, New York 10001 • 212 279 1001 • 888 466 3620 • Fax 212 279 6747

[illegible] The Bellevue Suite 600 • 200 S Broad Street Philadelphia PA 19102 215 732 9499 • 888 789 8378 • Fax 215 732 9559

www.ALCenvironmental.com

ENTERED

NYC 9/11 Public Portal Document

2.1 Air Sampling Procedures

ALC's licensed technicians collected air samples using the TEM Methodology.

The air samples were collected using high volume air sampling pumps. Once the pumps were in place, the air sampling technician recorded the location, time, date, sample numbers, pump number, flow rate, start and stop times and his initials.

The air sampling cassette was independent of the pump motor. This is to prevent the vibrations of the motor from affecting the fibers in the cassette. A separate stand or tripod was used to hold the cassette in place. The cassette was angled 45 degrees downward from the horizontal stand. This is to insure that no asbestos will drop into the cassette while sampling.

Using a rotameter, we calibrated each pump to the required flow rate, noting this rate on the sample record. After calibrating the pumps, the end cap from the cassette was removed; the pump was then run for the required amount of time.

The sampling pumps were checked periodically to ensure they were still operating, the cassettes were still in place, and no one had disturbed the equipment. If at any time, the area being sampled was suspected of having high fiber counts, the filter inside the cassettes was examined for "overloading", or an excessive amount of fibers and/or debris on the filter.

When the pre-determined volume of air was collected, the technician then calibrated the sampling pump again to determine the current flow rate. This rate will often be different from the flow rate measured at the beginning of the sampling period. That difference is usually due to the clogging of the filter, thereby adding increased resistance to the flow of air.

Once the pre-determined volume of air was reached, the time was recorded on the chain of custody form as well as on the cassette. Before the pump was turned off, the cassette was angled upward and the cap replaced on the end plug The cassettes were placed in sealed containers, labeled with an identifying code and a sample log was kept The samples were then submitted to the laboratory to be analyzed for asbestos content. A chain of custody record was completed and accompanied the samples to the laboratory.

2.2 Asbestos Analysis and Methodology

Each air sample is cross-referenced by field designation and lab internal code to ensure proper, consistent handling through a chain of custody Sample preparation takes place within a HEPA Filter clean bench to avoid any possible contamination Air sampling was conducted at a level approximating the breathing zone of persons anticipated to be present in the area during normal operations Samples collected represent the typical airborne fiber concentration of the area

3. Findings and Conclusions

One hundred and one (101) air samples were collected and analyzed via TEM Methodology. The results indicated that the areas achieved the acceptance criteria below <70 structures per mm2 set by the above regulations

NYC-WTC_000367357

NYC 9/11 Public Portal Document

4. Limitations and Exclusions

All the professional opinions presented in this report are based solely on the scope of work conducted and sources referred to in our report. The data presented by ALC in this report was collected and analyzed using generally accepted industry methods and practices at the time the report was generated. This report represents the conditions, locations, and materials that were observed at the time the fieldwork was conducted. No inferences regarding other conditions, locations, or materials, at a later or earlier time may be made based on the contents of the report. No other warranty, express or limited is made. ALC's liability and that of its contractors and subcontractors, arising from any services rendered hereunder, shall not exceed the total fee paid by the client to ALC for this project. This report was prepared for the sole use of our client. The use of this report by anyone other than our client or ALC is strictly prohibited without the expressed written consent of ALC. Portions of this report may not be used independent of the entire report.