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memorandum

M C CLIER

605 Third Avenue
31st Floor
New York, New York 10158
212-973-2912
212-953-0399 fax
www.mcclier.com

Date: 5/14/02

To: Krish Radhakrishnan
NYC/DEP

Project: American Express Project

From: Chris Sexton-McClier

Project No: 01-957

Copies To:

Subject: Washdown of the AMEX Bldg.
3 WFC (200 Vesey)

As per our telephone conversations, we are requesting your review of our application for FEMA funds to finance the washdown (cleaning) of our building.

Your assistance in this matter is greatly appreciated.

Sincerely,
McClier

Chris Sexton
Site Safety Manager

Inspected on April 15 2002
Bldg is Clean.

ENTERED

11521

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On April 15, 2002 I met with Chris Sexton of Total Safety Consulting (212) 640-9136 and Michael Handler of Turner Construction 212.786.1480. The purpose of the meeting was to discuss the planned washdown of 1, 2, 3, 4 World Financial Centers. At this time, all the decontamination of the exterior had been completed. Samples had been collected for ACM and were negative.

Their concern was that when the washdown starts they do not violate any of DEP regulations. Water would be trucked in from outside so as to observe water restrictions. This they felt was the right thing to do, even if DEP allowed them to used the pipe borne supply. The washdown is a plain washing to give the entire clean up some finality. It was agreed that some soil sampling would be done where the run off is expected. So as to ensure that no form of contamination get into the sewer system. A review of the ACM sampling done revealed that only 4 samples were collected from each building (total of 16). Most had trace ACM. I requested that more sampling be done as 4 samples are not sufficient to represent the enormity of the buildings. However, they said that samples may be hard to find. In the end it was agreed that more samples would be taken.
If the additional samples are negative, then the cleanup can go on as planned. A look at some of the small window ledges revealed that they were free of debris.

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TOTAL SAFETY CONSULTING LLC

Site Safety Management • Loss Control Consulting • Accident Investigation • Safety Training • Fire Safety

FAX COVER PAGE

DATE: 5/14/02

TO: DEP

ATTN: KRISH RADHAKRISHNAN

RE: AMERICAN EXPRESS BLDG. WASHINGTON

FAX #: 718 595-3744

TOTAL PAGES (INCLUDING COVER PAGE): 2

FROM: CHRIS SALTON

FAX #: 212-640-9223

VOICE #: 347-386-4893

NOTE

R.S.V.P. / ASAP PLEASE.

THANKS

Chris Salton

6 Highland Avenue • Staten Island, NY 10301 • (718) 273-5113

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Turner

Turner Construction Company
375 Hudson Street
New York, New York 10014-3667
phone: 212.229.6000
fax: 212.229.6329

April 17, 2002

Mr. Carlstien Lutchmedial, Director
Enforcement Asbestos Control Program
New York City Department of Environmental Protection
59-17 Junction Boulevard, 8th Floor
Corona, New York 11368-5107

Dear Mr. Lutchmedial:

Thank you for taking the time to meet with us regarding the façade cleaning at the World Financial Center.

As per our conversation, we are exempt from water restrictions when washing the building down. The results of the bulk sampling of material on the building showed less than 1% of asbestos and the D.E.P. therefore considers this a non-asbestos project. As a non-asbestos project, there is no requirement for collecting the wastewater from the wash down or any special protection.

We have attached copies of the bulk sample result for Towers 1, 2, 3, and 4. As per your suggestion, we will get 5 additional samples for each building for a total of nine (9) each. We will forward the results as they become available.

Very truly yours

TURNER CONSTRUCITON COMPANY

Michael Handler
Project Manager

:cncl.
Cc: W. Murray, T. Evans, D. Collins (TCCo),G. Gutierrez (McCleir) R. Guam, C. Sexton(TSC), M. Bosso (Brookfield), B. Grant (Merrill Lynch)

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SCILAB
FULL SERVICE ENVIRONMENTAL LABORATORIES

SCIENTIFIC LABORATORIES, INC.
117 EAST 30TH STREET
NEW YORK, NY 10016
TEL: (212) 679-8600 • FAX: (212) 679-9392

PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc.
Attn: Peter Ellams
511 6th Ave.
Suite 353
New York, NY 10012

Date Received 03/23/2002 **SciLab Job No.** 202033340
Date Examined 03/23/2002 **P.O. #** Ellams
ELAP Number 11480 **Page** 1 of 4
RE: World Financial Center - Towers A,B,C, and D

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-01	202033340-01	*Yes*	<1.% [1, 2]

Location: Tower A, 6th Floor - East End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile <1.0 %
Other Material: Animal hair Trace, Cellulose 20. %, Fibrous glass 40. %, Synthetic fibers Trace, Non-fibrous >39. %

WFC-02	202033340-02	*Yes*	<1.% [1, 2]

Location: Tower A, Mezzanine Level - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 20. %, Non-fibrous 65. %

WFC-03	202033340-03	*Yes*	<1.% [1, 2]

Location: Tower A, Mezzanine Level - Southeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair 5. %, Cellulose 20. %, Fibrous glass 15. %, Synthetic fibers 5. %, Non-fibrous 55. %

WFC-04	202033340-04	*Yes*	<1.% [1, 2]

Location: Tower A, Ground Level - Marble Ledge Structure

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile <1.0 %
Other Material: Animal hair Trace, Cellulose 30. %, Fibrous glass 15. %, Synthetic fibers Trace, Non-fibrous >54. %

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PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc.
Attn: Peter Ellams
511 6th Ave.
Suite 353
New York, NY 10012

Date Received 03/23/2002 **SciLab Job No.** 202033340
Date Examined 03/23/2002 **P.O. #** Ellams
ELAP Number 11480 **Page** 2 **of** 4
RE: World Financial Center - Towers A,B,C, and D

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-05	202033340-05	*Yes*	<1.% [1, 2]

Location: Tower B, 4th Floor- East Center End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 20. %, Fibrous glass 15. %, Synthetic fibers Trace, Non-fibrous 65. %

WFC-06	202033340-06	*Yes*	<1.% [1, 2]

Location: Tower B, 4th Floor - Southeast End Corner Structure Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile <1.0 %
Other Material: Cellulose 20. %, Fibrous glass 35. %, Synthetic fibers Trace, Non-fibrous >44. %

WFC-07	202033340-07	*Yes*	<1.% [1, 2]

Location: Tower B, 3rd Floor - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 20. %, Synthetic fibers Trace, Non-fibrous 65. %

WFC-08	202033340-08	*Yes*	<1.% [1, 2]

Location: Tower B, Mezzanine - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 25. %, Synthetic fibers Trace, Non-fibrous 60. %

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PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc.
Attn: Peter Ellams
511 6th Ave.
Suite 353
New York, NY 10012

Date Received 03/23/2002 **SciLab Job No.** 202033340
Date Examined 03/23/2002 **P.O. #** Ellams
ELAP Number 11480 **Page** 3 **of** 4
RE: World Financial Center - Towers A,B,C, and D

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-09	202033340-09	*No*	NAD [2]

Location: Tower C, 7th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types:
Other Material: Cellulose 20. %, Fibrous glass 10. %, Non-fibrous 70. %

WFC-10	202033340-10	*Yes*	<1.% [1, 2]

Location: Tower C, 7th Floor - Southeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 5. %, Fibrous glass 5. %, Synthetic fibers Trace, Non-fibrous 90. %

WFC-11	202033340-11	*Yes*	<1.% [1, 2]

Location: Tower C, 4th Floor - Southeast End Window Ledg

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 25. %, Non-fibrous 60. %

WFC-12	202033340-12	*Yes*	<1.% [1, 2]

Location: Tower C, 4th Floor - Northeast End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile <1.0 %
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 30. %, Synthetic fibers Trace, Non-fibrous >54. %

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PLM Bulk Asbestos Report

Independent Monitoring & Analysis, Inc.
Attn: Peter Ellams
511 6th Ave.
Suite 353
New York, NY 10012

Date Received 03/23/2002 **SciLab Job No.** 202033340
Date Examined 03/23/2002 **P.O. #** Ellams
ELAP Number 11480 **Page** 4 **of** 4
RE: World Financial Center - Towers A,B,C, and D

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
WFC-13	202033340-13	*Yes*	<1.% [1, 2]

Location: Tower D, 4th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 15. %, Fibrous glass 35. %, Non-fibrous 50. %

WFC-14	202033340-14	*Yes*	<1.% [1, 2]

Location: Tower D, Northeast End Balcony Below Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Cellulose 10. %, Fibrous glass 20. %, Synthetic fibers Trace, Non-fibrous 70. %

WFC-15	202033340-15	*Yes*	<1.% [1, 2]

Location: Tower D, 4th Floor - Southwest End Window Ledge

Description: Grey, Heterogeneous, Bulk Material
Asbestos Types: Chrysotile Trace
Other Material: Animal hair Trace, Cellulose 15. %, Fibrous glass 30. %, Synthetic fibers Trace, Non-fibrous 55. %

Reporting Notes:

(1) PLM analysis by EPA 400 Point Count Method, where Trace = less than 1% by weight (e.g. < 1.0%)

(2) Composite analysis results for heterogenous debris samples may be highly variable due to inhomogenities in materials present

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Analyzed by: Jonathan Teda _____

*NAD/NSD = no asbestos detected; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis by EPA 600/M4-82-020 per 40 CFR 763 (NVLAP Lab #200546-0) and ELAP PLM Analysis Protocol 198.1 for New York samples (NYSDOH ELAP Lab # 11480); Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested. AIHA# 102843; VT Cert# AL016055

Reviewed By:_____

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NYC-WTC_000417436

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Summary of Asbestos Abatement & Cleanup Following the WTC Disaster

World Financial Center South Tower 225 Liberty Street New York, NY

Prepared For:

Merrill Lynch & Co.
4 World Financial Center
250 Vesey Street
New York, NY

Prepared By:

GPS Environmental Consultants, Inc.
31 Trescott Path
Fort Salonga, NY 11768

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NYC-WTC_000417437

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2.0 Background

3.0 Abatement and Cleanup Activities

4.0 HVAC Cleanup Activities

5.0 Project Monitoring, Air Sampling and Analysis

6.0 Conclusion

Appendix A Phase I, Phase II, and Phase III Cleanup Procedure detailed Outline

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1.0 Executive Summary

GPS Environmental Consultants, Inc. provided asbestos consulting services in conjunction with the cleanup of the building located at 225 Liberty Street, New York, NY. GPS is a NYS licensed asbestos consulting firm that employs certified asbestos air sampling technicians, project monitors, asbestos inspectors and NYC asbestos investigators.

The project was conducted following a three-phase design. Cleaning operations for all phases were conducted by fully trained and certified asbestos handlers and supervisors.

GPS personnel collected work area preparation, during abatement, post abatement, and ambient air samples in conjunction with all phases of the cleanup project. Samples were analyzed using both Phase Contrast Microscopy, (PCM) and Transmission Electron Microscopy, (TEM). The scope of the project and the close proximity to ground zero required extensive, continuous asbestos air sampling to protect the health and safety of all involved in restoring the facility. Approximately 62,000 PCM and 32,000 TEM samples were collected and analyzed over the duration of the project, September 24 to January 21, 2002.

Upon completion of all three phase cleaning operations, and prior to the official opening of the building extensive asbestos air sampling was conducted to ensure the health and safety of the building occupants. Approximately 11, 000 TEM Air samples were collected over a 12 day period, (January 8 – 21, 2002), within representative locations on each floor from the 44th floor to Level C3. Aggressive air sampling was performed continuously over a 24-48 hour period for each floor. The compartmental Units and fresh air fans were running continuously throughout the sample collection process. Kam Consultants, a NYS licensed asbestos laboratory analyzed all the samples collected using the Transmission Electron Microscopy AHERA method (EPA 40 CFR Part 763 – Appendix A). All samples collected reported analysis results within acceptable ranges for re-occupancy, less than 70 Structures/mm2 for TEM Analysis. In accordance with Federal, State and local asbestos regulations and air quality criteria for asbestos, 2 World Financial Center, 225 Liberty Street, New York, NY may be re-occupied.

2.0 Background

The explosion, fire, and collapse of the World Trade Center on September 11, 2001, introduced significant amounts of dust and debris into the Merrill Lynch occupied facility located at 2 World Financial Center, South Tower, 225 Liberty Street, New York, NY.

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A GPS NYC Asbestos Investigator collected fourteen bulk samples of gross debris on September 19, 2001 from representative locations within the building to assess the amount of asbestos contamination resulting from the event. Analyses indicated that asbestos containing materials were detected in bulk samples collected from the debris. Based upon these results and in an effort to protect the health and safety of people involved in the cleanup project and to obtain a building acceptable for re-occupancy, a licensed asbestos abatement contractor, using certified asbestos handlers was employed by Merrill Lynch to clean the entire building using asbestos specific procedures.

The cleanup project was divided into three phases with the first phase, Phase I, beginning on September 24, 2001. The final phase, Phase III, was completed and final air sampling collection completed on January 21, 2002.

Phase I cleanup operations were performed by Pinnacle Environmental Corporation throughout the building in conformance with acceptable asbestos work practices.

Phase II fine cleaning operations were performed by BMS Castrophe utilizing asbestos abatement handlers for cleaning operations.

The HVAC duct system was separately assessed for asbestos and lead contamination by Tri Dim Corporation on October 19, 2001. Samples were collected from the HVAC duct system on the C levels, 3rd and 9th floors and analyzed for asbestos and lead content. No asbestos or lead was detected in the areas tested, although visual inspection indicated that the system was contaminated with fine particles. The particulate content was above the NADCA Standard Level of Cleanliness in 29 of 33 areas tested. A HVAC duct cleaning company was employed by Merrill Lynch to clean the HVAC system from the C levels through the 22nd floor. HVAC cleaning was performed by KASCO using certified asbestos workers. The cleaning procedures are outlined in section 3.0. A separate closeout report was issued by Kasco.

3.0 Abatement and Cleanup Activities

A NYC Investigator collected 14 bulk samples from representative floors on the east side of the facility where windows were broken and bulk/gross debris was observed. The samples were analyzed using the PLM, (polarized light Microscopy) analytical technique. Three Samples on three separate floors had results of asbestos present in amounts greater than 1%. Based on these results all bulk/gross material was treated as asbestos containing material, (ACM). The east side of facility from the street level through floor 22 was most heavily damaged with many broken windows and large amounts of debris. Floor 23 and above exhibited much less damage having fewer broken windows.

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The east side of the facility, where windows were broken and gross material entered was separated from the rest of the floor by polyethylene isolation barriers. Negative air machine were installed to assist in controlling fiber release from the east side. Cleanup work on both the east and west side of the facility was performed by a licensed Asbestos Abatement Contractor utilizing certified asbestos handlers and supervisors. GPS Environmental, a licensed Asbestos Consulting firm, performed asbestos air sampling. Sampling was performed during each phase of the cleanup operation and at the conclusion of each phase post/final asbestos air sampling was performed.

Pinnacle Environmental Corporation, a NYS Licensed Asbestos Abatement Company, located at 64-54 Maurice Avenue, Maspeth, New York, performed all Phase I abatement activities. Pinnacle personnel included only New York State Department of Labor (NYSDOL) and NYCDEP certified supervisors and asbestos handlers. BMS Catastrophe, a disaster recovery firm, performed phase II cleaning operations under the review of GPS Environmental. The procedures for each cleaning phase is briefly outlined below:

Phase I was conducted so that an acceptable environment could be obtained for limited access of essential personnel to seal open windows, assess damage to equipment, inventory items to be disposed of, etc. Phase one was conducted as an asbestos abatement project on the east side of the building where gross debris entered the facility through broken windows. GPS was the "Third Party" Asbestos Air Sampling Consultant for this aspect of the project as required by NYC and NYS asbestos regulations. On the west side of the facility and where only dust was present asbestos abatement personnel cleaned using asbestos specific procedures.

Phase II involved a fine, detailed cleaning of the facility from the Penthouse to level C3. BMS Catastrophe, a worldwide disaster recovery firm, utilizing asbestos abatement personnel performed the fine cleaning. BMS was employed directly by Merrill and managed under a management agreement by GPS Environmental.

Phase III Procedure Overview – The ventilation ductwork was inspected by a trained HVAC specialist employed by Tri Dim Corporation on October 19, 2001. Areas determined to be contaminated were cleaned by a certified duct-cleaning firm, Kasco. Following cleaning of the ductwork, all compartment units were activated after filters were placed in all supply grilles by BMS personnel. GPS conducted continuous asbestos air sampling for each floor for a 24-48 hour period to ensure that airborne fiber concentration levels were not exceeded due to missed contaminates within the local ductwork.
Once the fresh air intake ducts were cleaned and a new filtration system in place, both the upper and lower fresh air fans were turned on. As a measure to ensure a safe environment for all occupants, GPS conducted continuous asbestos air sampling for each floor as the compartment units and fresh air fans ran for a 24-48 hour period.

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A detailed description of each cleanup phase is located in appendix A.

4.0 HVAC Cleanup Activities

KASCO personnel performed the cleanup of the HVAC distribution system between the C levels and 22nd Floor. All KASCO personnel were given respirator fit tests and Pulmonary Function Tests prior to working at the site. Additionally, all personnel have been trained in environmental cleaning procedures. The procedures for cleaning are as follows:

HVAC Cleaning Procedures

(1) All supply registers and return air grills are removed and cleaned.
(2) Prior to cleaning, the position of the balancing damper shall be marked.
(3) All filtration devices are removed, inspected and replaced with new.
(4) Access ports were installed to facilitate the cleaning process in accordance with SMACNA Standards (SMACNA Standards in Construction 1985).
(5) All visible debris is removed from the supply duct system, return duct system, plenum filter compartment, blower fan and housing, and all other components in conformance with NADCA 1992-01 National Standard, Mechanical Cleaning of Non-Porous Air Conveyance System Components.
(6) Canvas flex duct to linear slot diffusers are removed and replaced.
(7) All duct linings in the high pressure duct systems on the discharge side of the supply fans are coated to prevent shedding. The duct liner in the outdoor air intake duct system shall also be coated.
(8) Register and grills shall be securely reinstalled and mechanical dampers returned to their original positions.
(9) The system is checked to ensure functional operation in manner equivalent or exceeding operation prior to the cleaning process.

5.0 Project Monitoring, Air Sampling and Analysis

GPS Environmental personnel included NYS DOL certified project monitors and air sampling technicians who collected air samples and monitored the activities of all cleaning personnel to ensure compliance with state and city regulations. The project began on September 24, 2001 and is ongoing

GPS personnel collected background, work area preparation, during abatement and post abatement air samples in conjunction with the cleanup. Samples were analyzed using Phase Contrast Microscopy or Transmission Electron Microscopy. Wipe samples are also collected and analyzed prior to re-occupancy.

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Samples were analyzed at KAM Consultants, located at 35-40 36th Street, Long Island City, NY.

6.0 Conclusion

GPS Environmental Consultants, Inc. provided air monitoring and asbestos consulting services in conjunction with the cleanup of 2 World Financial Center South Tower, 225 Liberty Street, New York, NY, using asbestos specific methods. The cleanup was performed in compliance with all applicable city, state and federal asbestos regulations. The building may be re-occupied in accordance with all applicable city, state and federal asbestos abatement re-occupancy criteria.

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225 Liberty Street (4 WFC)

Sampling Summary

Bulk Samples collected and analyzed by PLM - 14
Positive Bulk samples - 3
All debris was considered ACM based on the 3 samples

TEM samples 32,000 (Sep 24, 2001 – Jan 21, 2002) ~25 positive

PCM samples 62,000 (Sep 26, 2001 – Jan 21, 2002) ~ 20 positive

Total # samples taken 94,014

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NYC-WTC_000417444

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225 Liberty Street (2 WFC)

Sampling Summary

Bulk Samples collected and analyzed by PLM - 14
Positive Bulk samples - 3
All debris was considered ACM based on the 3 samples

TEM samples 32,000 (Sep 24, 2001 – Jan 21, 2002) ~25 positive

PCM samples 62,000 (Sep 26, 2001 – Jan 21, 2002) ~ 20 positive

Total # samples taken 94,014

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GPS GPS Environmental Consultants, Inc.
31 Trescott Path
Fort Salonga, New York 11768
Phone: (631) 269-4205, Fax: 269-9527 e-mail gps_environmental@msn.com

February 5, 2002

NYC DEP
Attention: Krish
59-17 Junction Blvd
8th floor
Corona, NY 11368

Re: All Asbestos Samples for WFC South Tower, 225 Liberty Street, NY NY

To whom it may concern:

Enclosed herein is the final report and all lab reports for the above referenced project. A company was hired to compile data or lab reports on CD. We have enclosed this CD and have attempted to sort the files to make it easier for your review. The laboratory storage technique was not designed for sorting so some error is expected, (note floor 1 has many different floors included). There are approximately 90,000 samples in total for all the collected samples.

Kam consultants, Inc was the Laboratory that performed the analysis and provided the excel spreadsheets for your convenience.

Sincerely Yours,

Gregory P. Smyth
President GPS

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