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Lower Manhattan Development Corporation
130 Liberty Street Deconstruction Project
Exceedance Report
October 3, 2005

Date of Exceedance: Wednesday, September 28, 2005

Analyte: Asbestos AHERA

Location: Station 8, northeast area, roof level

Concentration: 96 s/mm^2

USEPA Site-Specific Trigger Level: 70 s/mm^2

Target Air Quality Level: N/A

Summary of Event:

An exceedance of the USEPA Site-Specific Trigger Level of Asbestos AHERA occurred on the roof level at 130 Liberty Street (Building) for one of the air samples collected on September 28, 2005. The sample was sent to and received by EMSL Analytical Inc. laboratory (NYSDOH ELAP #10872) September 29, 2005. On September 30, 2005, the sample was analyzed for TEM EPA 40 CFR Part 763 and the results reported. The laboratory report is included in the attached Supporting Data.

Activities at 130 Liberty Street on this date included completion of the roof abatement. The work included gravel removal, vacuuming and wet-wiping all roof surfaces including, but not limited to, vents, mechanical surfaces, bulk heads, roof floor, and parapet wall. Work occurred from 8:00 AM through 5:00 PM.

No visual observations were made which could impact the samples on the roof. The Visual Inspection Report, attached in the Supporting Data, indicate no visual emissions were observed in the roof vicinity. Photographs taken on September 28, 2005 of roof activities were taken and are also included in the Supporting Data.

The wind rose, included in the attached Supporting Data, from the meteorological station located on the roof indicates a predominant south-south-east wind direction. Station 8, located on the northeast corner of the Building roof, can be considered upwind from the roof activities. The upwind Stations 6 and 7, located on the southwest and southeast corners, respectively, did not detect any asbestos above 19 s/mm^2 by the TEM method. The downwind Station 9, located on the northwest corner of the roof, had an asbestos TEM reading of 19 s/mm^2.

Submitted By: Ed Gerdts Date: October 3, 2005

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Corrective Action:

As a result of the roof abatement completion, samples were not collected on September 29, 2005 at air monitoring Stations 6, 7, 8, or 9. However, per ICR 56, the roof area was re-cleaned utilizing additional supplemental wet-methods and asbestos air monitoring reinstated on the roof for September 30, 2005 in order to confirm that concentrations were below the USEPA Site-Specific Trigger Level for Asbestos. Five samples were collected, one on each roof corner and one in the roof center and analyzed for TEM EPA 40 CFR Part 763. No asbestos was detected in the five samples (< 15 s/mm^2). These results are attached in the Supporting Data. Going forward, TRC will continue to closely monitor the use of dust control practices including frequently wetting surfaces containing dust with amended water during the work.

Supporting Data attached:

1. Analytical Data summary –analytical results for all stations on the date of the exceedance and the additional sampling which occurred on September 30, 2005.
2. Particulate Data –
    a. $PM_{2.5}$ and PM_{10} data for the sample collection period of interest at the station where the exceedance occurred
    b. plot of PM_{10} concentrations (10-minute averages) versus time for the station where the exceedance occurred.
3. Meteorological Data – wind rose plot for the sample collection period of interest
4. Visual Inspection Reports – visible dust emission monitoring summaries from the 130 Liberty Street project.
5. Photographs of activities at and near the station where the exceedance occurred

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