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Sent: Wednesday, June 06, 2007 4:36 PM  
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Subject: Re: Amendment to AMP - Proposed Movement of Scaffold Monitors  
Attachments: DRAFT AMP Amendment Form #5 - Draft 060107.pdf

As discussed with you earlier today, the U.S. Environmental Protection Agency (EPA) has completed its review of the June 1, 2007 submittal by TRC Solutions on behalf of the Lower Manhattan Construction Command Center, a division of the Lower Manhattan Development Corporation (LMDC). The June 1, 2007 submittal below is proposed Amendment No. 5 and is intended to modify Section 2 of the Ambient Air Monitoring Program Plan (part of the accepted September 2005 Deconstruction Plan) as it relates to the downward movement of scaffold air monitors at 130 Liberty Street.

Based on our review of the aforementioned document, EPA accepts the June 1, 2007 Amendment No. 5 to the 130 Liberty Street Deconstruction Plan.

EPA and the other regulatory agencies will monitor the deconstruction work as it progresses, and we will continue our ongoing consultation with you throughout the execution of the project. Thank you.

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Subject

Amendment to AMP - Proposed  
Movement of Scaffold Monitors

Per our discussions, attached find TRCs Draft proposal for the downward movement of the scaffold monitors at 130 Liberty Street. Please let us know if you have any questions or would like to set up a call to discuss subsequent to your review Thanks Ed(See attached file: DRAFT AMP Amendment Form #5 - Draft 060107.pdf)

## SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 5

DATE FORM SUBMITTED: 06/08/07

**Title**                      **Section 2 – Ambient Air Monitoring Program Plan**  
**130 Liberty Street Abatement & Deconstruction Project**  
**September 7, 2005**

### AMENDMENT #5

This Amendment will define the downward movement of scaffold monitors and provide LMDC with the ability to relocate all four (4) scaffolding locations one last time to the 15<sup>th</sup> floor at elevation and not just any floor or elevation on an as needed basis. This Amendment will comply with the existing provisions of the September 7, 2005 Ambient Air Monitoring Program Plan and will supplant Amendment #4 (03/08/07) which specifies that scaffolding monitoring stations be moved on an as needed basis during the remainder of the abatement and deconstruction program such that these monitors are not placed greater than ten (10) floors below active abatement and not greater than (20) floors below active deconstruction. The current project status is as follows: the interior abatement is complete from the roof to and including the 26<sup>th</sup> floor work area; the exterior column cover and fascia removal is nearing completion down to the 28<sup>th</sup> floor; structural deconstruction is occurring on the 36<sup>th</sup> floor slab. Scaffold monitors that are currently located on the 20<sup>th</sup> floor shall be moved to the 15<sup>th</sup> floor scaffold platform.

All four (4) monitoring locations currently in place atop building roofs adjacent to the 130 Liberty Street property and all four (4) ground level stations will remain in place during the balance of the building abatement and deconstruction process. Silica monitors currently situated on the 30<sup>th</sup> floor shall be moved downward as structural deconstruction progresses. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.

#### **Reason for Amendment:**

Amendment #4 (03/08/07) to the September 7, 2005 Ambient Air Monitoring Program Plan specifies that scaffolding monitoring stations be moved on an as needed basis during the remainder of the abatement and deconstruction program such that these monitors are not placed greater than ten (10) floors below active abatement and not greater than (20) floors below active deconstruction. The abatement and deconstruction activities at 130 Liberty Street are a very dynamic process especially when performed simultaneously. As a result, monitoring at fixed elevations in accordance with these floor separation requirements will result in multiple movements of the scaffolding stations during the balance of the program. Multiple relocations of these four (4) scaffolding stations will adversely affect completion of the project in a timely and cost effective manner moving forward. In addition 1-2 days of data will be lost for the majority of the program parameters during each relocation event. Furthermore, data collected at the four (4) scaffolding stations since their installation on November 16, 2005 indicate no exceedances of EPA Site Specific Trigger Levels for any parameter with the sole exception of silica and no exceedances of Target Air Quality Levels with the exception of silica and PM2.5. Silica is currently monitored at scaffolding stations dedicated to this parameter in close proximity to the active structural deconstruction zone and all PM2.5 exceedances of Target Air Quality Levels have historically been associated with regional air quality episodes and/or regional meteorological conditions. Data collected to date at scaffolding stations for all parameters provide ample justification for the final relocation plan for the four

## **SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 5**

(4) scaffolding stations addressed with this Amendment.

Additionally, the note to Table 3 of the Ambient Air Monitoring Program Plan Section 6.0 states downward moving of elevated Scaffold Stations will be based on highest reasonable floor in relationship to the work and will be determined in consultation with the EPA.

### **Sections of Air Monitoring Plan Affected:**

Section 2.1, Network Design, On-site Scaffolding Elevated Stations: The reference to the relocation on the scaffolding to any floor or elevation on an as needed basis contained in Amendment #4 to the Air Monitoring Plan will be removed. This will be replaced with the following text: “Scaffolding stations currently situated on the 20<sup>th</sup> floor will be relocated a final time to the 15<sup>th</sup> floor. They will remain at this location until such time that the deconstruction reaches the 20th floor at which time these stations will be removed from service. Downward movement of scaffold silica monitors currently in place on the 30<sup>th</sup> floor will progress along with the deconstruction. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

### Section 2.3, Locations of Monitoring Stations:

The reference to the relocation on the scaffolding to any floor or elevation on an as needed basis contained in Amendment #4 to the Air Monitoring Plan will be removed. This will be replaced with the following text: “Scaffolding stations currently situated on the 20<sup>th</sup> floor will be relocated a final time to the 15<sup>th</sup> floor. They will remain at this location until such time that the deconstruction reaches the 20th floor at which time these stations will be removed from service. Downward movement of scaffold silica monitors currently in place on the 30<sup>th</sup> floor will progress along with the deconstruction. Silica monitors shall not be placed greater than ten (10) floors below the active deconstruction of abated and cleaned floors which are above the buffer zone and have successfully passed visual inspection and aggressive air clearance sampling.”

**Date Implemented:** June 2007