130 Liberty Street

New York, New York

Supplemental Investigation Summary Report

Heating, Ventilation, and Air Conditioning Distribution Duct Sampling Summary Results

Prepared for:
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February 10, 2005

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1.0 INTRODUCTION

TRC Environmental Corporation (TRC) was contracted and authorized by the Lower Manhattan Development Corporation (LMDC) to conduct a *Supplemental Investigation* (SI) of previously inaccessible spaces in the building located at 130 Liberty Street (the Building). The intent of the SI is to address the additional sampling recommendations presented in The Louis Berger Group, Inc. (Berger) *Initial Building Characterization Report* dated September 14, 2004. This Summary Report presents the results of the supplemental investigation and testing of the previously inaccessible interior heating, ventilation, and air conditioning (HVAC) distribution ductwork within the Building.

1.1 Background

The Building is located across the street and south of the WTC site and is a former office building comprised of 40 stories and approximately 1.5 million square feet. The massive debris generated from the collapse of the South Tower of the WTC broke approximately 1,500 windows, curtain wall, and structural components creating a gash (Gash Area) in the Building's exterior exposing portions of the interior north side of the Building between the 7th and 24th floors. The debris demolished the plaza in front of the Building, exposing the basement and subbasement (Basement A and Basement B) areas and ruptured a diesel fuel tank in the basement, the contents of which burned. The Gash Area and broken windows exposed the interior of the Building to the elements.

As a result of the collapse of the World Trade Center (WTC) on September 11, 2001, a combination of soot, dust, dirt, debris, and contaminants settled in and on the Building. See the *Initial Building Characterization Report* for additional background information.

1.2 Scope of Work

In the *Initial Building Characterization Report*, Berger identified areas that were inaccessible during their investigation including the following locations:

- Curtain Wall Cavity
- Cell Systems within Floors
- Interstitial Spaces within Interior Walls and Column Cavities
- Inside Vertical Shafts
- Exterior Building Surfaces

In addition, Berger recommended performing preliminary waste characterization.

This supplemental investigation summary presents the additional inspection and sampling performed by TRC of the previously inaccessible interior heating, ventilation, and air conditioning (HVAC) distribution ductwork within the Building. Supplemental investigations regarding curtain wall cavity, cell systems within floors, interstitial spaces within interior walls and column cavities, inside vertical shafts, exterior building surfaces, fireproofing, waste characterization, and visual inspection of the Building for mold and asbestos containing building materials (ACBM) are addressed in separate summaries.

As part of the supplemental investigation, TRC collected the following samples:

COPC	Asbestos	Lead	Silica	Dioxin	PAH	MMVF
Total Samples	126	106	35	55	55	27

For the interior surfaces of the HVAC distribution ductwork at 130 Liberty Street, TRC collected at a minimum ten representative (10) surface wipe/or micro-vacuum samples for the United States Environmental Protection Agency (USEPA) contaminants of potential concern (COPCs) list analysis. The COPC list includes asbestos, lead, man-made vitreous fibers (MMVF), silica, polynuclear aromatic hydrocarbons (PAHs) and dioxins. Sampling locations were accessed through the duct clean-out access ports.

TRC utilized a tiered approach to sample analysis. All asbestos and lead wipe samples were analyzed and the results reviewed. Results of this study were compared to the findings in the *Initial Building Characterization Report* and benchmark and background concentrations presented in previous environmental studies as detailed in the following sections. If surface concentrations of asbestos and lead were found to be similar to the *Initial Building Characterization Report* and elevated when compared to benchmark and background concentrations, further analysis for the remaining COPCs was not conducted. If surface concentrations of asbestos and lead were found to be less than the *Initial Building Characterization Report*, benchmark, and background concentrations, further analysis for the remaining COPCs was conducted.

1.3 Previous Environmental Studies

Several studies concerning WTC-related contaminants have been performed by, or with the review of, the federal, state, and local regulatory authorities in the aftermath of the events of September 11, 2001. In particular, the USEPA has been responsible for studies associated with the development of the EPA's list of COPCs, as discussed in this section.

The USEPA COPC Committee developed, in their *World Trade Center Indoor Air Assessment: Selecting Contaminants of Potential Concern and Setting Health Based Benchmarks, Peer Review Draft (September 2002),* a tiered approach to evaluate the health risks posed by contaminants that might be present in an indoor environment (air and settled dust) for residential reoccupancy. For each COPC, three levels were developed:

Tier I - Level above which, after elimination of potential indoor sources (combustion by-products, stored chemicals, etc.), aggressive clean-up action should be taken expeditiously along with follow-up sampling to confirm attainment of Tier III level.

Tier II - Range where diligent cleaning should continue, after elimination of potential indoor sources (combustion by-products, stored chemicals, etc.), with follow-up sampling to confirm attainment of Tier III level.

Tier III - Level below which the risk is negligible or consistent with the New York City background level found in the USEPA Background Study as identified below.

These levels were established for residential reoccupancy. The Tier I screening level was intended to be protective of a resident who may have been exposed to WTC-related contaminants in their residence for one year. The Tier III clearance level was intended to be protective of a resident who is exposed to WTC-related contaminants in their residence for 30 years, which was the upper-bound estimate for residency in one dwelling. For asbestos and lead in settled dust, the tiered values are as follows:

ASBESTOS

Tier	Settled Dust
I	>30,000 str/cm2
II	30,000 str/cm2 to background
III	Background

LEAD

Tier	Settled Dust
I	>40 ug/ft2
II	40 ug/ft2 to 25 ug/ft2 (or background)
III	<25 ug/ft2 (or background)

These levels were developed to be risk-based levels for residential settings. While the USEPA residential benchmark and background concentrations relate to residential settings and are not directly applicable to a commercial deconstruction project, these studies can be used to put the results of this supplemental investigation into relative context.

Subsequent to peer review of the September 2002 report, the USEPA COPC Committee developed, in their *World Trade Center Indoor Environmental Assessment: Selecting Health-Based Benchmarks (May 2003)* report, health based benchmarks that reflected only the Tier III levels.

The USEPA, Region 2, also developed the *World Trade Center Background Study Report (April 2003).* The objective of this study was to determine and/or estimate indoor baseline levels or background concentrations for the presence of specific contaminants in residential buildings unaffected by the WTC disaster. The average background concentrations for asbestos and lead in settled dust on hard surfaces are 6,192 structures per square centimeter (str/cm^2) and 1.78 micrograms per square foot (ug/ft^2), respectively.

Based on the text by Millette and Hays, *Settled Asbestos Dust Sampling and Analysis*, levels of asbestos in settled dust as determined by the microvacuum techniques are considered low if less than 1,000 str/cm^2. Levels above 10,000 str/cm^2 are considered generally above background. Levels above 100,000 str/cm^2 are considered high and in the range of significant accidental release from an abatement site.

1.4 Purpose and Objectives

The objective of the SI is to provide additional information relative to the concentrations of COPCs within previously inaccessible spaces. This SI summary outlines results specifically for the HVAC distribution ductwork investigation.

The SI of previously inaccessible areas is intended to assist in determining what measures and protocols may be required in support of the 130 Liberty Street cleaning and

deconstruction plan. In particular, the results of the SI are intended to provide reference information allowing for informed decisions to be made regarding appropriate cleaning and deconstruction methods. These decisions include the development and implementation of engineering controls to contain the work zone (i.e., to ensure no exposure to the surrounding community during the cleaning and deconstruction) and appropriate methods for the disposal or recycling of materials generated by the cleaning and deconstruction activities. Using the available characterization results, LMDC, its consultants, and the selected deconstruction contractor can develop and implement appropriate deconstruction protocols and safety precautions for the cleaning and deconstruction process to ensure the health and safety of workers and the surrounding community.

2.0 METHODOLOGY

This section presents the methodologies implemented for the dust characterization for asbestos and lead in the HVAC distribution ductwork. These tasks were implemented in accordance with the *Sampling Analysis and Quality Assurance Project Plan* (SAQAPP) developed by TRC dated November 15, 2004.

TRC collected representative surface wipe samples for asbestos and lead from the interior HVAC distribution ductwork, excluding the 5th, 6th, 40th, and 41st mechanical floors. Wipe and/or micro-vacuum sampling had been conducted previously within the HVAC units on the mechanical floors, as reported in the *Initial Building Characterization Report,* and these areas are scheduled for cleaning prior to Building deconstruction.

Samples were collected through HVAC cleaning access ports using the following equipment:

Asbestos surface wipe and micro-vacuum samples were collected and analyzed per methods detailed in the American Society for Testing Materials (ASTM) standard test method D6480-99 and ASTM D5755-03, respectively. Asbestos bulk samples were analyzed per method PLM NYS 198.1. Lead wipe samples were collected following the United States Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing Appendix 13.1 and analyzed as per analytical method USEPA SW-846 7420. Lead micro-vacuum samples were sampled via ASTM method E 1973-99 and analyzed per method NIOSH 7082.

Samples were properly labeled as per the SAQAPP and delivered to the EMSL Analytical Inc. laboratory, an independent New York State Department of Health certified laboratory.

3.0 RESULTS

3.1 Asbestos

Ten asbestos wipe, one micro-vacuum, one duplicate, and three bulk dust samples were collected on various floors of the Building as detailed below. Samples were divided up by Zone, as described in the *Initial Building Characterization Report*. Zones 2 and 3 apply to TRC's study and are defined as follows:

> Zone 2: Office space located at or below the 24th Floor that may have been subjected to dust entering the Building through the Gash, HVAC system (and possibly circulated through the HVAC system), vertical shafts, or broken windows.
>
> Zone 3: Office space located above the 24th Floor that may have been impacted by dust distributed through the HVAC system, vertical shafts, or broken windows.

Wipe and micro-vacuum sample results ranged from less than 15,600 structures per square centimeter (str/cm^2) to 4,620,000 str/cm^2. The arithmetic mean concentration for these eleven results was 1,188,236 str/cm^2 using one half the detection limit for non-detected sample results. No asbestos was detected in the three bulk samples. Sample results are provided in the attached Table 1A and 1C.

Asbestos Sample ID	Floor	Location	Zone
Wipe			
GM-ASB-W-MEZZ-HVAC-010	Mez-zanine	Building center, southeast quadrant	2
KD-ASB-W02-HVAC-009	2	West central building side	2
KD-ASB-W03-HVAC-008	3	Building center, southeast quadrant	2
KD-ASB-W-04-HVAC-007	4	North central building side	2
KD-ASB-W-05-HVAC-006	5	South central building	2
KD-ASB-W-08-HVAC-005	8	Northeast quadrant, building center	2
KD-ASB-W-12-HVAC-004	12	Northeast quadrant, building center	2
KD-ASB-W-18-HVAC-001	18	Southwestern building quadrant, building center	2
KD-ASB-W-27-HVAC-0003	27	Southeastern building quadrant, building center	3
KD-ASB-W-39-HVAC-0002	39	Building center	3
Microvacuum			
SR-ASB-MV02-HVAC-001	2	Microvacuum, Interior HVAC	2
Bulk			
KD-0002	35	Southern building face	3
KD-0003	2	Southern building face	2
KD-0004	4	Building center	2

A limited data validation was performed on the sample results in accordance with the *USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review EPA 540/R-99/008* (October 1999). In general, the data appeared to be valid as reported and may be used for decision-making purposes.

TRC reviewed the *Initial Building Characterization Report*. Berger collected 40 supplemental screening samples of the settled dust from porous and non-porous surfaces and analyzed for asbestos using TEM. The samples were collected from various places within the Building, including, but not limited to carpeting, counters, vent units, and above the ceiling tiles. The results revealed detectable levels of asbestos above the residential background level of 6,192 structures/cm^2 identified in the EPA *World Trade Center Background Study Report Interim Final* (April 2003). The highest concentrations of asbestos were identified in the first and second floors, fifth floor mechanical room, and the $40^{th}/41^{st}$ floor mechanical room. Asbestos was detected in dust at concentrations in excess of 6,192 structures/cm^2 in 24 of the 31 floors sampled by TEM analysis (77%). The samples containing asbestos ranged from a minimum concentration of less than 891 structures/cm^2 (from Floors 5, 24, 25, 28, 34, and 41) to a maximum concentration of 4,879,200 structures/cm^2 (from Floor 2). These results are generally consistent with the HVAC SI results.

TRC reviewed the *Deutsche Bank Damage Assessment Report: Contamination Report Pursuant to Testing Protocol-11, Perimeter Induction Units Summary Report* by RJ Lee Group, Inc. dated December 2003. The perimeter induction units are an integral part of the HVAC system that provides conditioned air to the occupied spaces of the Building. The average and maximum asbestos concentrations presented in this report were 2,228,000 str/cm^2 and 199,600,000 str/cm^2, respectively. The average result is comparable to the concentrations identified in this SI of the HVAC system, although the maximum results is at least two orders of magnitude higher than the maximum concentration identified in this SI.

3.2 Lead

Ten lead wipe samples, one microvacuum sample, one duplicate sample, and one field blank sample were collected on various floors of the Building as detailed below. Sample results ranged from 12.5 ug/ft^2 to 1,300 ug/ft^2 with an arithmetic average of 494 ug/ft^2. Sample results are provided in the attached Table 1B.

Sample ID	Floor	Location	Zone
Wipe			
ZD-Pb-W-HVAC-29-010	29	Northeast building corner	3
ZD-Pb-W-HVAC-20-002	20	West central building side	2
ZD-Pb-W-HVAC-18-003	18	Building center	2
ZD-Pb-W-HVAC-15-004	15	Building center	2
ZD-Pb-W-HVAC-12-005	12	Northeast quadrant	2
ZD-Pb-W-HVAC-11-006	11	West central building side	2
ZD-Pb-W-HVAC-10-007	10	Southeast building corner	2
ZD-Pb-W-HVAC-9-008	9	Southern quadrant of building	2
ZD-Pb-W-HVAC-8-009	8	Southeastern quadrant, building center	2
ZD-Pb-W-HVAC-7-010	7	Southwestern building quadrant, towards center	2
ZD-Pb-W-HVAC-7-011	7	Northwest quadrant by Gash	2
Microvacuum			
KD-MV-2-HVAC-01	2	In HVAC	2

A limited data validation was performed on the above samples in accordance with the *USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review* (July 2002). In general, the data appeared to be valid as reported and may be used for decision-making purposes.

According to the *Initial Building Characterization Report*, there was significant variation in the lead testing results collected from the Building dust samples. Lead was detected in 122 of 125 samples tested. Lead results of samples collected above the plenum ranged from 350 ug/m^2 (32.52 ug/ft^2) to 10,900 ug/m^2 (1,012.6 ug/ft^2). Lead results from samples collected below the plenum ranged from 150 ug/m^2 (13.92 ug/ft^2 - in Zone 3) to 101,000 ug/m^2 (9,383.2 ug/ft^2 - in Zone 1). This variation in lead concentrations is consistent with the level of disturbance that has occurred within the Building, including the cleaning of the "Gash Area," since September 11, 2001. The report has identified lead concentrations within the Building that exceed both the background residential level and the health-based benchmark identified in the EPA studies in 121 of the 125 samples tested (97%). These results are relatively greater than the HVAC SI results.

RJ Lee's *Perimeter Induction Unit Summary Report* indicated average and maximum lead surface concentrations of 118 ug/ft^2 and 1,210 ug/ft^2, respectively. These average and maximum results are generally consistent (within one order of magnitude) with the average concentrations of lead found in this SI.

4.0 FINDINGS

Sample results were compared to criteria provided in Section 1.2 and 1.3 and identified on the bottom of Tables 1A and 1B. This Supplemental Investigation has identified average asbestos and lead concentrations in the interior of the HVAC ductwork system that exceed the benchmark criteria provided in the May 2003 and September 2002 WTC Indoor Air Assessment studies and are generally consistent with the concentrations identified in the *Initial Building Characterization Report.* Therefore, the other COPC wipe samples were not analyzed. While the USEPA residential benchmark and background concentrations relate to residential settings and are not directly applicable to a commercial deconstruction project, these studies can be used to put the results of this Supplemental Investigation into relative context.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The levels of asbestos and lead on the surfaces of the interior of the HVAC distribution ductwork were generally consistent with the asbestos and lead levels for the dust in the accessible areas identified in the *Initial Building Characterization Report* and exceeded the USEPA residential health-based benchmark and background criteria. The results of the sampling and testing performed for this Supplemental Investigation revealed levels of contaminants that should be addressed in connection with the deconstruction of the Building. Therefore, TRC recommends review of the results by federal, state, and local regulators and that the HVAC ductwork be handled in a manner that complies with applicable laws.

6.0 REFERENCES

Damage Assessment, 130 Liberty Street Property, Contamination Report Pursuant to Testing Protocol-11, Perimeter Induction Units, Summary Report. RJ Lee Group, Inc., December 2003.

Initial Building Characterization Study Report, 130 Liberty Street, New York, New York. The Louis Berger Group, Inc., September 14, 2004.

Risk Assessment Guidance for Superfund. Volume I: Human Health Evaluation Manual (Part A). Interim Final. Office of Emergency and Remedial Response, Washington, D.C. United States Environmental Protection Agency, December 1989.

Sampling, Analysis, and Quality Assurance Project Plan, Supplement Investigation of 130 Liberty Street, New York, New York. TRC Environmental Corp., November 15, 2004.

Settled Asbestos Dust Sampling and Analysis. James R. Millette, Steven M. Hays, 1994.

World Trade Center Indoor Environment Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks. Contaminants of Potential Concern (COPC) Committee. United States Environmental Protection Agency, May 2003.

World Trade Center Indoor Air Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks. Contaminants of Potential Concern (COPC) Committee of the World Trade Center Indoor Air Taskforce Working Group. Peer Review Draft, September 2002.

World Trade Center Background Study Report, Interim Final. United States Environmental Protection Agency, Region 2, April 2003.

Supplemental Investigation
HVAC Distribution Ducts Interior Surface Sample Results
LMDC
130 Liberty Street
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Asbestos Wipe (ASTM 6480-99) and
Asbestos Microvacuum (ASTM D5755-03)
HVAC Distribution Ducts Interior Surface Sample Results
LMDC
130 Liberty Street
February 10, 2005

Sample ID	Lab Sample ID	Sample Date	Sample Type	Floor	Zone	Location	ASBESTOS (structures/cm^2)
GM-ASB-W-MEZZ-HVAC-010	030422631-0001	11/15/04	Wipe	Mezz	2	Interior HVAC, East Grid F4	**735,000**
KD-ASB-W02-HVAC-009	030422631-0002	11/15/04	Wipe	2	2	Interior HVAC, West Grid B4	**4,620,000**
KD-ASB-W03-HVAC-008	030422631-0003	11/15/04	Wipe	3	2	Interior HVAC, Central Grid F3	**1,360,000**
KD-ASB-W-04-HVAC-007	030422631-0004	11/15/04	Wipe	4	2	Interior HVAC, North Grid C7	**2,520,000**
KD-ASB-W-04-HVAC-007-QA/QC	030422631-0005	11/15/04	Wipe	4	2	Interior HVAC, North Grid C7	**4,730,000**
KD-ASB-W-05-HVAC-006	030422631-0006	11/15/04	Wipe	5	2	Interior HVAC, South Central Grid D3	<314,000
KD-ASB-W-08-HVAC-005	030422631-0007	11/15/04	Wipe	8	2	Interior HVAC, North Grid F6	<156,000
KD-ASB-W-12-HVAC-004	030422631-0008	11/15/04	Wipe	12	2	Interior HVAC, North Grid F5	<156,000
KD-ASB-W-18-HVAC-001	030422631-0009	11/15/04	Wipe	18	2	Interior HVAC, South Central Grid C3	<15,600
KD-ASB-W-27-HVAC-0003	030422631-0010	11/15/04	Wipe	27	3	Interior HVAC, South Central Grid E3	<15,600
KD-ASB-W-39-HVAC-0002	030422631-0011	11/15/04	Wipe	39	3	Interior HVAC, North Central Grid E3	<314,000
SR-ASB-MV02-HVAC-001	030422817-0001	11/18/04	MicroVac	2	2	Interior HVAC	**3,350,000**

	str/cm2
Arithmetic Mean (ND=1/2)	1,188,236
May 2003 Benchmark[1]	n/a
April 2003 Background Assessment[2]	6,192
September 2002 WTC Indoor Assessment[3]	
Tier I	>30,000
Tier II	>30,000 to background
Tier III	Background

References:

[1] *World Trade Center Indoor Environment Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks.* Contaminants of Potential Concern (COPC) Committee. United States Environmental Protection Agency, May 2003.

[2] *World Trade Center Background Study Report, Interim Final* . United States Environmental Protection Agency, Region 2, April 2003.

[3] *World Trade Center Indoor Air Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks.* Contaminants of Potential Concern (COPC) Committee of the World Trade Center Indoor Air Taskforce Working Group. Peer Review Draft, September 2002.

Table 2
HVAC Distribution Ductwork - Lead Surface Dust Sampling Results
Lead Wipe (SW-846 7420)
Lead Microvacuum (NIOSH 7082)
LMDC
130 Liberty Street
New York, New York
February 10, 2005

Sample ID	Lab Sample ID	Sample Date	Sample Type	Floor	Zone	Location	Lead (ug/ft^2)	Lead (ug/m^2)
ZD-Pb-W-HVAC-29-010	030423328-0001	11/24/04	Wipe	29	3	HG-67 NE Corner Bldg	**480**	5,167
ZD-Pb-W-HVAC-20-002	030423328-0002	11/24/04	Wipe	20	2	AB-56 N Bldg	**730**	7,858
ZD-Pb-W-HVAC-18-003	030423328-0003	11/24/04	Wipe	18	2	ED-34 Center of Bldg	**790**	8,503
ZD-Pb-W-HVAC-15-004	030423328-0004	11/24/04	Wipe	15	2	ED-56 N-Center of Bldg	**350**	3,767
ZD-Pb-W-HVAC-12-005	030423328-0005	11/24/04	Wipe	12	2	GF-56 NE Bldg	**190**	2,045
ZD-Pb-W-HVAC-11-006	030423328-0006	11/24/04	Wipe	11	2	AB-56 NW Bldg	**1,300**	13,993
ZD-Pb-W-HVAC-10-007	030423328-0007	11/24/04	Wipe	10	2	HG-23 SE of Elevators	**230**	2,476
ZD-Pb-W-HVAC-9-008	030423328-0008	11/24/04	Wipe	9	2	FG-23 S of Elevators	**140**	1,507
ZD-Pb-W-HVAC-8-009	030423328-0009	11/24/04	Wipe	8	2	FE-34 SS of Elevators	**430**	4,628
ZD-Pb-W-HVAC-7-010	030423328-0010	11/24/04	Wipe	7	2	BC-34 West of Elevators	**780**	8,396
ZD-Pb-W-HVAC-7-011	030423328-0011	11/24/04	Wipe	7	2	QA/QC Sample NW by Gash	**1,300**	13,993
ZD-Pb-W-HVAC-X-000-BLANK	030423328-0012	11/24/04	Wipe			Blank	<10	<108
KD-MV-2-HVAC-01	030422818-0001	11/18/04	Microvacuum	2	2	In HVAC	12.5	135
BL	030422818-0002	11/18/04	Microvacuum			Blank	<4	<43

	ug/ft2
Arithmetic Mean (ND=1/2)	494
May 2003 Benchmark[1]	25
April 2003 Background Assessment[2]	1.78
September 2002 WTC Indoor Assessment[3]	
Tier I	>40
Tier II	40 to 25 (or background)
Tier III	<25 (or background)

References:

[1] *World Trade Center Indoor Environment Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks.* Contaminants of Potential Concern (COPC) Committee. United States Environmental Protection Agency, May 2003.

[2] *World Trade Center Background Study Report, Interim Final*. United States Environmental Protection Agency, Region 2, April 2003.

[3] *World Trade Center Indoor Air Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks.* Contaminants of Potential Contaminants of Concern (COPC) Committee of the World Trade Center Indoor Air Taskforce Working Group. Peer Review Draft, September 2002.

Table 3
HVAC Distribution Ductwork - Asbestos Bulk Sampling Results
Asbestos Bulk (ELAP 198.1)

LMDC
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New York, New York
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Sample ID	Lab Sample ID	Sample Date	Sample Type	Floor	Zone	Location	Asbestos (%)
KD-002	030424268-0001	12/7/04	Bulk	35	3	ED-18	NAD
KD-003	030424268-0002	12/7/04	Bulk	2	2	FE-12	NAD
KD-004	030424268-0003	12/7/04	Bulk	4	2	FE-45	NAD

NAD = No asbestos detected