LMDC
Lower Manhattan Development Corporation

Deconstruction Plan
Deutsche Bank/130 Liberty Street

June 20, 2005

FACT SHEET No. 4

This fact sheet describes the Deconstruction Plan prepared by the Lower Manhattan Development Corporation (LMDC) in anticipation of the upcoming cleaning and deconstruction of the 130 Liberty Street building.

Background

On August 31, 2004, the LMDC took ownership of the building located at 130 Liberty Street, previously known as the Deutsche Bank Building. LMDC subsequently prepared a detailed cleaning and deconstruction plan for removal of the building to permit the redevelopment of the World Trade Center (WTC) Site. The Deconstruction Plan provides for the safe and effective abatement, removal, and disposal of various contaminants previously identified in and on the building.

Project Phases

The deconstruction will be carried out in three stages. The first, or **Preparatory Phase**, will include the erection of scaffolding on all four sides of the building, erection of a personnel hoist on the exterior of the building, and removal of the existing netting.

Phase I of the Deconstruction Project will include the cleaning and removal of all interior materials and non-structural elements. Phase I will occur under negative pressure containment and will include the following activities:

- Removal and disposal of WTC dust and debris;
- Removal and disposal of installed porous and certain non-porous building materials and components;
- Removal and disposal of asbestos and other regulated waste such as light bulbs, lighting ballasts, and batteries;
- Cleaning of Walker ducts and raceways;
- Cleaning and salvage of certain installed non-porous building materials and components; and
- Air clearance sampling to ensure the cleaning was effective.

Phase II of the Deconstruction Project will involve the actual deconstruction of the building structure, including removal of the exterior wall systems, structural steel, concrete slabs, and metal decking. These deconstruction activities will proceed from the top of the building down.

Deconstruction Plan

A draft Deconstruction plan was submitted to regulators and released to the public on December 13, 2004. Comments were incorporated into revised sections of the Plan, which was made available to the public on May 12, 2005. A fully updated version of the plan was released on June 14, 2005. The revised Deconstruction Plan details protocols that will be applied to all three phases of deconstruction activities.

The Deconstruction Plan consists of the following sections:

1. Waste Sampling and Management Plan,
2. Ambient Air Monitoring Program,
3. Emergency Action Plan (EAP),
4. Asbestos and Contaminants of Potential Concern (COPC) Abatement and Removal Plan, and
5. Health and Safety Plan (HASP).

Each section of the Deconstruction Plan is summarized below.

Section 1: Waste Sampling and Management Plan

The Waste Sampling and Management Plan was developed to properly classify, manage, containerize, transport, and dispose of (or recycle) waste streams that will be generated during deconstruction. Anticipated waste streams include: dust; deconstruction waste such as carpeting, doors and frames, raised flooring, and suspended ceiling tiles; and other building-related regulated material such as fire extinguishers, light ballasts, lamps, and batteries. All waste materials will be disposed of in accordance with applicable laws. Travel routes will be determined in consultation with regulatory agencies.

Section 2: Ambient Air Monitoring Program

The purpose of the Ambient Air Monitoring Program is to monitor air quality in the vicinity of 130 Liberty Street during deconstruction of the building. The three components of proposed air monitoring are:

- Level 1: Air monitoring of workers involved with deconstruction activities as required by OSHA. This program is detailed in Section 5 of the Plan.
- Level 2: Area air monitoring in accordance with asbestos abatement rules in Industrial Code Rule 56. Area air monitoring will be performed by a third-party consultant both inside and directly

outside the active work areas. This program is detailed in Section 4 of the Plan.

- Level 3: Exterior ambient air monitoring within site boundaries and at specific elevated locations across the street from the site. This is detailed in Section 2 of the Plan.

Section 3: Emergency Action Plan

The EAP is designed to minimize the impact of any emergency that may occur during the deconstruction process through mitigation and response planning and establishment of a response structure. The EAP identifies emergency contacts, individual and collective responsibilities, and the training and education required of on-site personnel. In addition, the EAP explains emergency response procedures, including reporting of emergencies and building and site evacuation, and identifies designated assembly areas.

The EAP identifies suitable response actions for specific emergencies/events, including fire/explosion, power failure, structural failure, unplanned release of hazardous/regulated waste, medical emergency and rescue, and falling or dropped building components. An addendum to this revised plan incorporates the Community Notification Plan, which is appended to the EAP as Appendix F.

Section 4: Asbestos and COPC Abatement and Removal Plan

This plan was developed to prevent potential exposure of workers and the public to asbestos fibers and other contaminants in the building; safeguard workers and the public from construction debris and materials; and maintain a safe working and neighborhood environment. LMDC and its contractors will conduct the abatement work in a protective manner in full compliance with applicable laws.

The New York State Department of Labor (NYSDOL) and other regulatory agencies have stated that the interior of the entire structure is contaminated with asbestos and other contaminants. Accordingly, as required by applicable law, all Phase I activities will be conducted by a NYSDOL-licensed Asbestos Abatement Contractor with properly certified workers under controlled conditions, including containment and negative air pressure.

The sequence of work during Phase I will include the following: work area preparation, including installation of High Efficiency Particulate Air (HEPA) ventilation equipment, pre-cleaning, and installation of isolation barriers; establishment of waste and personal decontamination systems areas; establishment of the negative-pressure work area; removal of asbestos-containing building materials (ACBM), WTC dust and debris, and all interior building equipment, components and materials by certified personnel; packaging, transport, and disposal of waste materials; ongoing air monitoring; detailed cleaning of work areas; and clearance air testing.

Section 5: Health and Safety Plan

The HASP presents the practices and procedures that will be followed during all site activities to ensure the safe completion of tasks. The procedures are designed to prevent occupational injuries and site worker exposures to chemical, physical, and biological hazards. The HASP includes, but is not limited to, the following requirements:

Personnel: Participate in site orientation/training, follow designated safety and health procedures, and utilize specified personal protective equipment such as respirators.

Contractors: A licensed New York City Site Safety Manager (NYCSSM) will be on site throughout the project and will have the daily responsibility for ensuring implementation of the HASP.

Subcontractors: Each subcontractor must prepare a HASP for its project tasks; have a supervisor on site who understands all potential health and safety issues associated with specific tasks; provide a subcontractor safety officer to ensure compliance with the provisions of both the LMDC HASP and the subcontractor HASP; ensure appropriate training; and provide daily health and safety briefings to personnel.