

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM:

Issue 3

DATE FORM SUBMITTED: 12/19/06

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

AMENDMENT #3

Subsequent to review and validation of data from the laboratory that the USEPA Site Specific Trigger Level for silica has been exceeded at an on-site air monitoring station (four (4) ground level and four (4) scaffolding stations at elevation), TRC will notify EPA within one (1) hour after initial receipt of this reviewed and validated data. During this one (1) hour period TRC will assess whether the exceedance was or was not associated with activities at 130 Liberty Street. The assessment will involve the completion of a Silica Exceedance Assessment Checklist (attached to this amendment) by TRC; this checklist will be distributed to the EPA by TRC as part of the notification process. Based on this checklist, TRC and EPA will jointly determine the cause of the exceedance and whether work stoppage is warranted. Work will not stop during the 1 hour time frame needed to complete the assessment. If TRC is unsuccessful at contacting EPA for the notification, TRC will initially determine the cause of the exceedance and whether work stoppage is warranted. A follow up discussion will take place when EPA becomes available to discuss the initial determination made by TRC.

If the assessment determines that an air monitoring station exceedance of a USEPA Site Specific Trigger Level for silica is associated with activities at 130 Liberty Street, the exceedance will result in a stoppage of work until an evaluation of emission controls is performed and corrective action acceptable to USEPA is in place. It should be noted that only silica generating work activities that are determined to be associated with the exceedance will stop. For example if concrete breaking/crushing/handling activities are determined to be associated with the silica exceedance, then these activities will stop. Other work such as abatement work or steel cutting operations, which may be determined to not be associated with the silica exceedance will continue. The regulatory agencies will make the final determination of what work shall stop. If the assessment determines that an exceedance of a USEPA Site Specific Trigger Level for silica at any station in the network is not associated with activities at 130 Liberty Street, work stoppage will not be required. A follow-up detailed Exceedance Report will typically follow later the same day but no later than 24 hours after the exceedance is first reported to TRC by the laboratory.

Reason for Amendment:

Crystalline silica is a common constituent of urban ambient air. Additionally numerous new building construction projects and refurbishing/maintenance of existing structures are in progress in the immediate vicinity of the 130 Liberty Street property. Accordingly, a routine procedure for the assessment of silica exceedances is warranted to minimize unnecessary work stoppages.

Sections of Air Monitoring Plan Affected:

8.1.2, USEPA Site-Specific Trigger Levels: As discussed above, work stoppage will not take place when it has been determined that a silica exceedance at any monitoring station is attributable to sources at off-site locations.

9.0, Exceedance Notification: The exceedance notification for silica will initially include a notification to EPA via telephone and/or electronic messaging within one (1) hour after validated and reviewed data is

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received, followed by the distribution of an exceedance assessment checklist prepared by TRC. The checklist and all available supporting documentation for checklist completion will be used to make an immediate determination of the need for work stoppage. This will be followed by the standard detailed Exceedance Report within 24 hours. The Exceedance Report will contain all of the supporting documentation used in determining the cause of the silica exceedance.

Date Implemented: December 2006 (Phase I)

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Silica Exceedance Assessment Checklist
130 Liberty Street Deconstruction Project

Date of Checklist Completion/Exceedance Notification: _____

Exceedance Description:

Date of Exceedance¹: _____

¹USEPA Site-specific Trigger Level and Target Air Quality Level = 10 µg/m³

Station (number and location): _____ Silica/Concentration: _____
Station (number and location): _____ Silica/Concentration: _____
Station (number and location): _____ Silica/Concentration: _____

Windrose Data:

Roof: Y _____ N _____
Predominant Wind Direction (from): _____

Ground Level: Y _____ N _____
Predominant Wind Direction (from): _____

Visible Emissions: 130 Liberty Street: Y _____ N _____
Description _____

Visible Emissions: Off Site: Y _____ N _____
Description _____

Off Site Work Activities with Potential to Contribute to Silica Containing Fugitive Dusts:
Description _____

Onsite Work Activities:
Description _____

Photographs: Y _____ N _____

Elevated PM10 Concentrations²: Y _____ N _____
²Defined as one or more 10-minute averages ≥ 150 ug/m³

Description _____

Building Containment/Integrity Verification:
Negative Pressure: Y _____ N _____
Manometer Readings: _____

Corrective Actions: Y _____ N _____
Description _____

EXCEEDANCE ASSESSMENT SUMMARY:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

December 21, 2006

Victor J. Gallo
Senior Advisor & Counsel, Environmental & Regulatory Affairs
Lower Manhattan Development Corporation
One Liberty Plaza, 20th Floor
New York, New York 10006

Re: Ambient Air Monitoring Program and QAPP – Silica Exceedances On-Site

Dear Mr. Gallo:

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the revised December 21, 2006 Ambient Air Monitoring Program Amendment Form (Issue 3) and Quality Assurance Project Program Amendment Form (Issue 6) to the September 7, 2005 Deconstruction Plan which discusses the revised procedures to be followed with regards to on-site silica exceedances of the EPA Site Specific Trigger Level. These revised amendment forms were submitted by TRC Environmental Corporation via e-mail on December 21, 2006 for the Lower Manhattan Development Corporation (LMDC) on behalf of the Lower Manhattan Construction Command Center.

Based on our review of the December 21, 2006 submission, EPA agrees with the proposal and accepts the amendments to the September 7, 2005 Deconstruction Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. Evangelista".

Pat Evangelista
WTC Coordinator
New York City Response and Recovery Operations
USEPA-Region 2

cc: Sal Carlomagno, NYSDEC
Chris Alonge, NYSDOL
Krish Radhakrishnan, NYCDEP
Richard Mendelson, OSHA
Robert Iulo, NYCDOB