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Subject: RE: QAPP Amendment 9
Attachments: pic11215.gif; QAPP Amendment Form_Issue #9 100909.pdf

The U.S. Environmental Protection Agency (EPA) has completed its review of the attached October 9, 2009 Proposed Amendment #9 to the September 7, 2005 Quality Assurance Project Plan (QAPP) for the Ambient Air Monitoring Program of the 130 Liberty Street Abatement and Deconstruction Project submitted by TRC Environmental Corporation (TRC) on behalf of the Lower Manhattan Development Corporation for 130 Liberty Street in lower Manhattan.

Based on our review, and in consultation with the New York State Department of Labor (NYSDOL) and the New York City Department of Environmental Protection (NYCDEP), EPA accepts the above-referenced proposed amendment which updates two sections of the QAPP to reflect the changes accepted on October 8, 2009 to Amendment #9 to the September 7, 2005 Section 2 - Ambient Air Monitoring Program of the 130 Liberty Street Abatement and Deconstruction Project.

EPA's review is not intended as a review and/or acceptance of structural engineering and safety matters or requirements for the protection of worker safety and health or for fire protection and safety at 130 Liberty Street. EPA is relying on the New York City Department of Building's, the U.S. Department of Labor Occupational Safety and Health Administration's and the New York City Fire Department's expertise in these areas, respectively.

EPA will continue to work with our regulatory partners to monitor the 130 Liberty Street activities throughout the execution of the project.

Thank you.

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Subject

RE: QAPP Amendment 9

To Regulators,

Please find enclosed the QAPP Amendment #9 for the building located at 130 Liberty Street, New York, NY.

Please note that as per the email directive received from Cas Holloway of the Mayor's Office, TRC is submitting this report to the persons included in this email with the understanding that they will determine if any other City Agencies must review.

Upon review, please feel free to call if there are any questions. Thank you.

Edward A. Gerdts, CIH, CSP, LEED AP
Managing Principal
East Region Building Sciences Practice Leader

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(See attached file: QAPP Amendment Form_Issue
#9 100909.pdf)

QAPP AMENDMENT FORM: Amendment # 9

DATE FORM SUBMITTED: 10/09/09

QAPP Title **Quality Assurance Project Plan for the Ambient Air Monitoring Program**
130 Liberty Street Deconstruction Project
September 7, 2005

AMENDMENT #9

This Amendment addresses discontinuation of air monitoring activities during periods of time when there are no work activities in progress at 130 Liberty Street, other than routine inspections or site visits. Currently there are eight (8) stations, including four (4) on-site ground-level and four (4) off-site roof-level stations, operating in accordance with the Ambient Air Monitoring Plan, dated September 7, 2005.

During periods of inactivity:

There will be periods when no work activities are taking place. When such periods equal or exceed 24 hours, the Owner may elect to cease ambient air monitoring temporarily. Upon notification by the Owner, TRC shall notify Regulators via email at least 48 hours before ambient air monitoring stops and again before ambient air monitoring resumes and the reason for each stoppage. Such periods may include weekends, holidays, periods of bad weather or periods resulting from other causes when the project is shutdown. All monitoring events that are in progress when a work stoppage takes place will proceed until the required 24 hour duration for the sampling event has been satisfied. In the event that a weekly sampling session is in progress for PAHs and PCDDs/PCDFs the session will resume immediately upon resumption of work activities (e.g. – if four (4) days of a planned seven (7) day weekly session is completed, the remaining three (3) days of the session will resume concurrent with resumption of work activities). For example if work activities are stopped on a Wednesday which represents the 3rd day of sampling for a week and work activities resume the following Monday, then Monday would represent the 4th day of sampling for that week. If organics sampling was planned for the 5th day of the week these samples would now be collected on Tuesday. Routine inspections and site visits shall be allowed to occur in the building without resumption of ambient air monitoring.

Ambient air monitoring will resume as outlined in Amendment #8 prior to conclusion of each period of inactivity. Prior to the resumption of sampling associated with any resumption in work activities all monitoring equipment will be calibrated and verified to be in proper working order. This will include verification that all monitors are operating in accordance with the Ambient Air Monitoring Plan and Quality Assurance Project Plan of September 7, 2005 as well as all relevant Amendments to each of these documents. These measures will take place prior to the planned resumption of work activities. TRC shall notify the regulators that all monitoring equipment has been calibrated and is in working order prior to the planned resumption of work activities.

During periods of work activity:

The ambient air monitoring network, as described in Amendment #8, will be in continuous operation during all periods of time in which any work activities other than routine inspections or site visits are taking place at 130 Liberty Street. Amendment #8 outlines the transition phases of the ambient air monitoring network that will take place as deconstruction progresses.

QAPP AMENDMENT FORM: Amendment # 9

Reason for Amendment:

The original September 7, 2005 Ambient Air Monitoring Program Plan identified a monitoring network to be in operation during all activities at 130 Liberty Street. However it is anticipated that there will be time(s) when there are no work activities taking place other than routine inspections or site visits. This Amendment, as a result, modifies the periods of time when monitoring stations are in operation.

Sections of QAPP Affected:

Section 6.2 (Project Purpose and Objectives): This section will be revised to reflect the elimination of air monitoring during periods of inactivity, as described above.

Section 7.1.1 (Sampling Tasks): This section will be revised to include periods of inactivity, as described above, as a separate phase of the project. This section will note that air monitoring will not be required during these periods of inactivity.

Date Implemented: October 2009