



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

September 23, 2010

Mr. Edward A. Gerdts
Managing Principal
TRC Environmental Corporation
1430 Broadway – 10th Floor
New York, New York 10018

Re: September 17, 2010 Proposed Amendment #15 – Ambient Air Monitoring Program Plan and September 17, 2010 Proposed Amendment #15 - Quality Assurance Project Plan (QAPP) for the Ambient Air Monitoring Program for the 130 Liberty Street Abatement and Deconstruction Project, September 7, 2005, 130 Liberty Street, New York, N.Y.

Dear Mr. Gerdts:

This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the September 17, 2010 Proposed Amendment #15 to the September 7, 2005 Section 2 – Ambient Air Monitoring Program Plan of the 130 Liberty Street Abatement and Deconstruction Project and the September 17, 2010 Proposed Amendment #15 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 amendments.

EPA's acceptance 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Evangelista', written in a cursive style.

Pat Evangelista
Director, Office of Strategic Programs

cc: Richard Mendelson, OSHA
Christopher Alonge, NYSDOL
Krish Radhakrishnan, NYCDEP
Christopher Santulli, NYCDOB
Thomas Kunkel, LMCCC
Michael Weinlein, FDNY
Suzanne Mattei, NYSDEC

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 15

DATE FORM SUBMITTED: 09/17/10

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

AMENDMENT #15

This Amendment presents the schedule and rationale for removal of monitoring locations when deconstruction activities have completed removal of the 5th Floor concrete slab.

Reason for Amendment:

The following three (3) community monitoring stations located off-site are currently in use for the 130 Liberty Street air monitoring program:

- FDNY 10-10 House - 124 Liberty Street – Roof of 2 story structure (Station #5)
- Marriott Hotel - 85 West Street - 4th Floor Roof (Station # 21)
- 120 Cedar Street – O’Hara’s - Roof of 5th Floor (Station # 22)

These elevations were suitable for monitoring in the vicinity of what was a 14 story structure, as per Amendment #12. As the deconstruction of the building progresses through the 5th Floor, the four remaining air monitoring locations slightly modified as described below are anticipated to adequately monitor the ambient air for the remainder of deconstruction. This Amendment presents the removal of the monitoring locations when deconstruction approaches the lower floors.

Schedule for Removal/Installation:

- FDNY 10-10 House (Station #5) - will be taken out of service at such time that removal of the concrete slab at the 5th floor elevation is completed.
- Marriott Lower Landing (Station #21) – will be taken out of service at such time that removal of the concrete slab at the 5th floor elevation is completed.
- 120 Cedar Street (Station #22) - will be taken out of service at such time that removal of the concrete slab at the 5th floor elevation is completed.
- 120 Cedar Street Sidewalk Bridge Level (Station #23) – will be installed and put in service at such time that removal of the concrete slab at the 5th floor elevation is completed.
- Southeast Corner Onsite, Sidewalk Bridge Level (Station #2) - will be taken out of service once 120 Cedar Sidewalk Bridge Level station becomes operational.
- The three existing onsite stations not listed in this Amendment will remain in operation during the remainder of deconstruction.

Sections of Air Monitoring Plan Affected:

Amendment #12, Section 2.3 Location of Monitoring Stations: This section will be revised to include the new location for Station #23.

Amendment #12, Figure 1 (Site Location Map and Proposed Ambient Air Monitoring Locations): This

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 15

figure will change due to the future elimination of Stations #2, #5, #21, and #22 and the addition of Station #23. A revised Figure 1 is attached to this Amendment.

Amendment #12, Figure 2 (Network Schematic): This figure will change due to the future elimination of Stations #5, #21, and #22. A revised Figure 2 is attached to this Amendment.

Amendment #12, Figure 3 (3-Dimensional View of Air Monitoring Stations from the South): This figure will change due to the future elimination of Stations #2, #5, #21, and #22 and the addition of Station #23. A revised Figure 3 is attached to this Amendment.

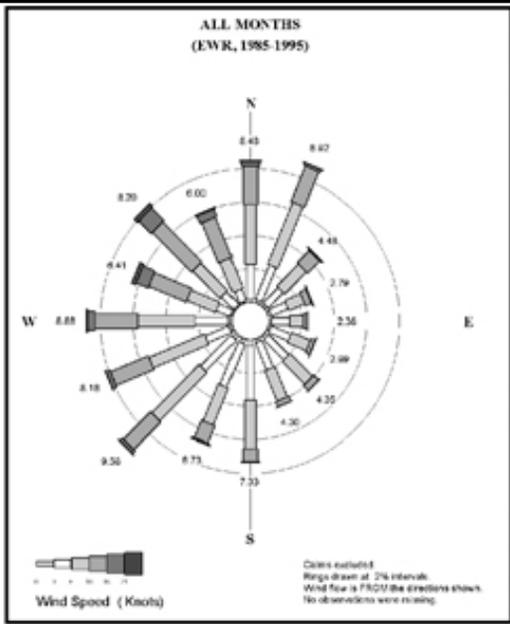
Amendment #12, Figure 4 (3-Dimensional View of Air Monitoring Stations from the North): This figure will change due to the future elimination of Stations #5, #21, and #22. A revised Figure 4 is attached to this Amendment.

Amendment #12, Table 1 (Locations of Monitoring Stations): The table has been updated to include footnotes for Stations #2, #5, #21 and #22 showing the stations in operation until deconstruction activities complete removal of the 5th Floor concrete slab and the addition of Station #23. A revised Table 1 is attached to this Amendment.

Amendment #12, Table 1a (Monitoring Station Summary): The table has been updated to include footnotes for Stations #2, #5, #21 and #22 showing the stations in operation until deconstruction activities complete removal of the 5th Floor concrete slab and the addition of Station #23. A revised Table 1a is attached to this Amendment.

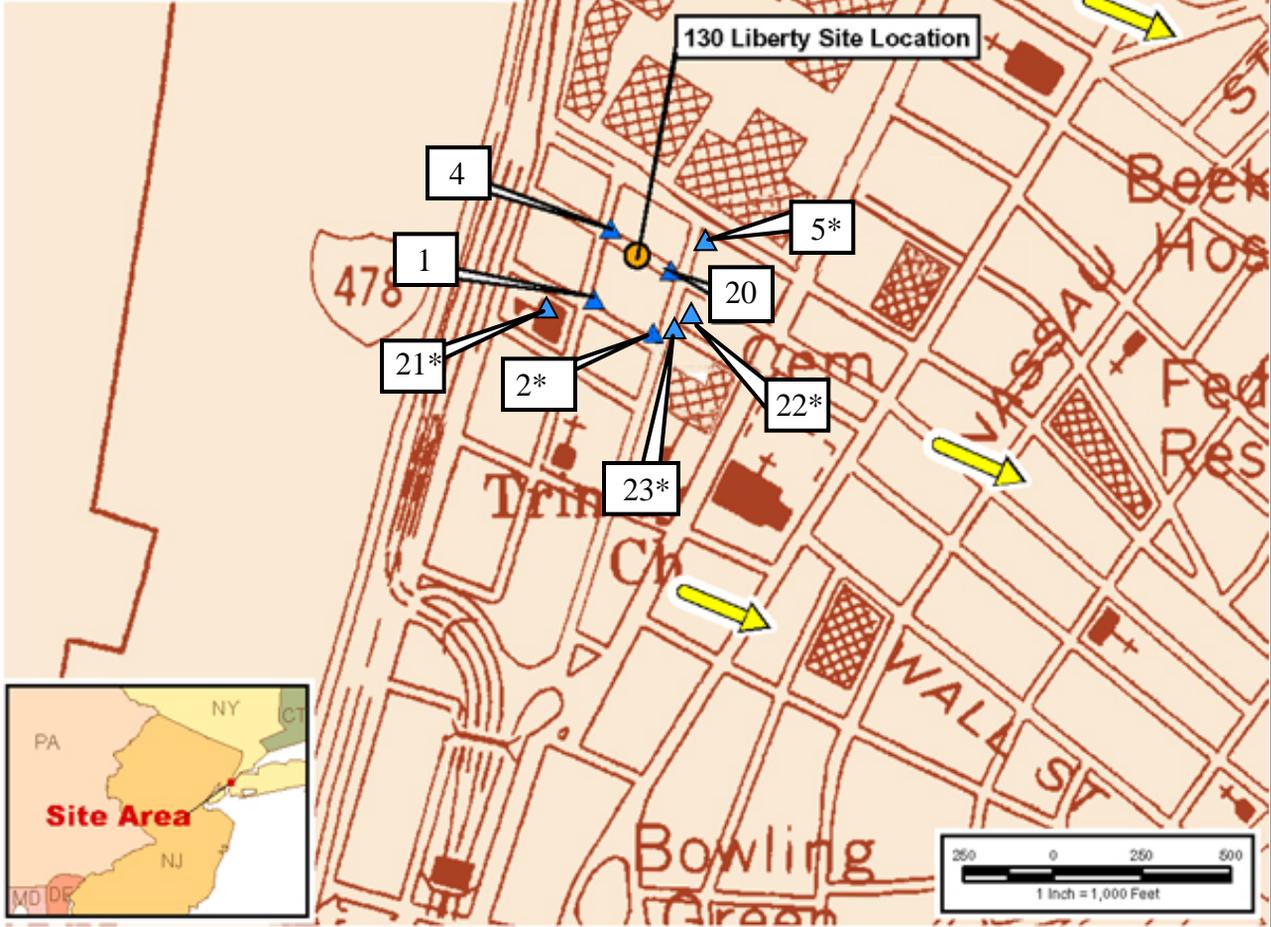
Table 5 (Phase II – Structural Deconstruction Phase Sampling and Analysis Summary): Column 1 of this table will be revised to show that no roof top locations will be sampled and only four ground/street level stations will be sampled. Changes regarding target parameters and sampling frequencies are addressed in Amendments #13 and #14.

Date Implemented: September 2010



Legend

▲ Monitoring Locations



LEGEND:

← AVERAGE WIND DIRECTION

SOURCE:
USGS 7.5 Minute Series (Topographic) Quadrangles: Jersey City, NJ-NY
Wind Roses for Newark International Airport, 1985-1995

PROJECT:
130 LIBERTY STREET
DECONSTRUCTION PROJECT

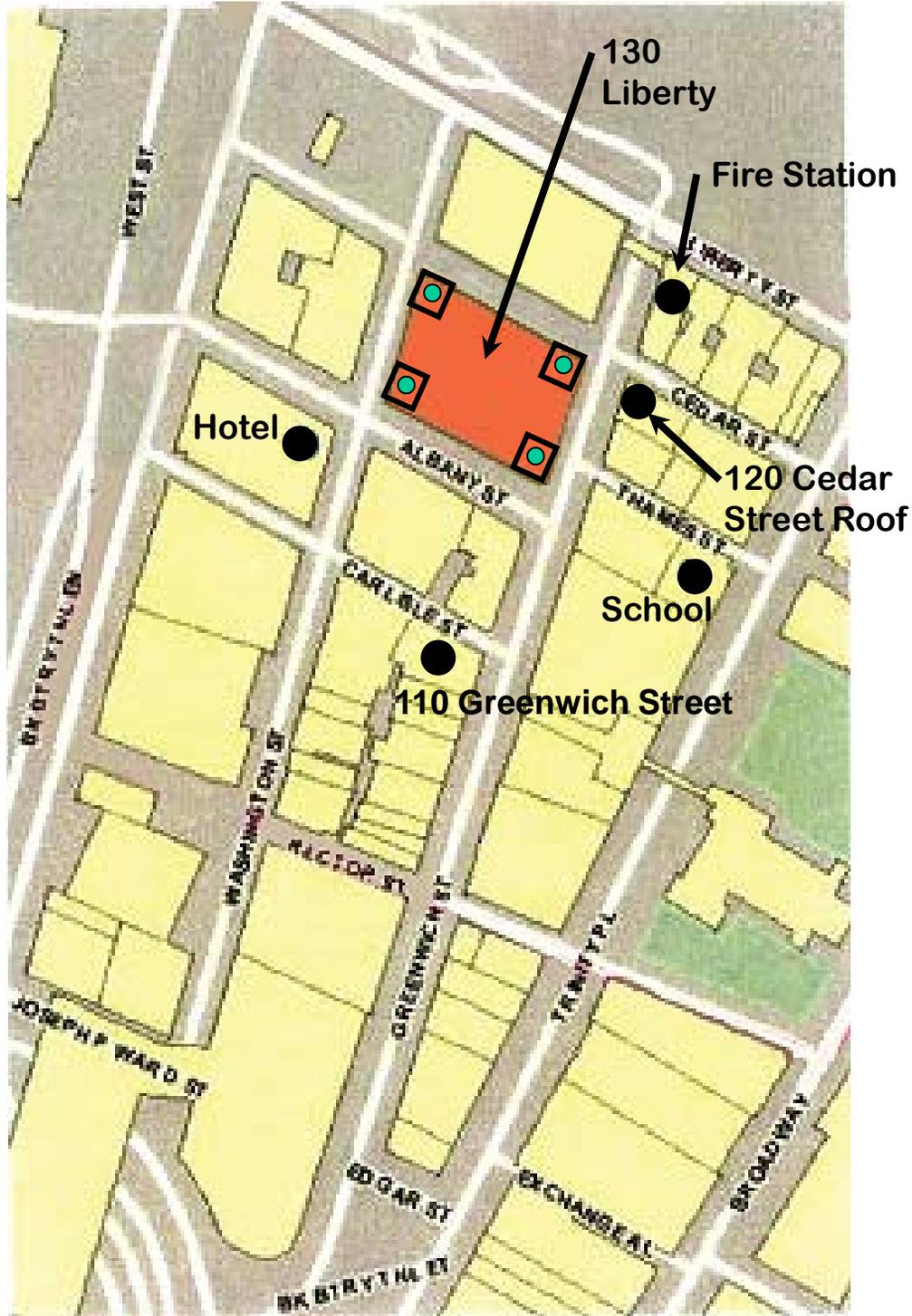
* Stations 5, 21 and 22 will be taken out of service when the deconstruction completes the removal of the concrete slab at the 5th floor. Station 23 will be installed and put in service when the deconstruction completes the removal of the concrete slab at the 5th floor. Station 2 will be taken out of service when Station 23 becomes operational.

**Site Location Map for
Ambient Air Monitoring Locations
130 Liberty Street
New York, New York
Updated Sept 2010: AMP Amendment #15**

TRC Wannalancit Mills
650 Suffolk Street
Lowell, Ma. 01854
(978) 970-5600

Drawn: MAN
Checked: ML
SCALE: AS SHOWN
Date 9/17/2010

**FIGURE
1**



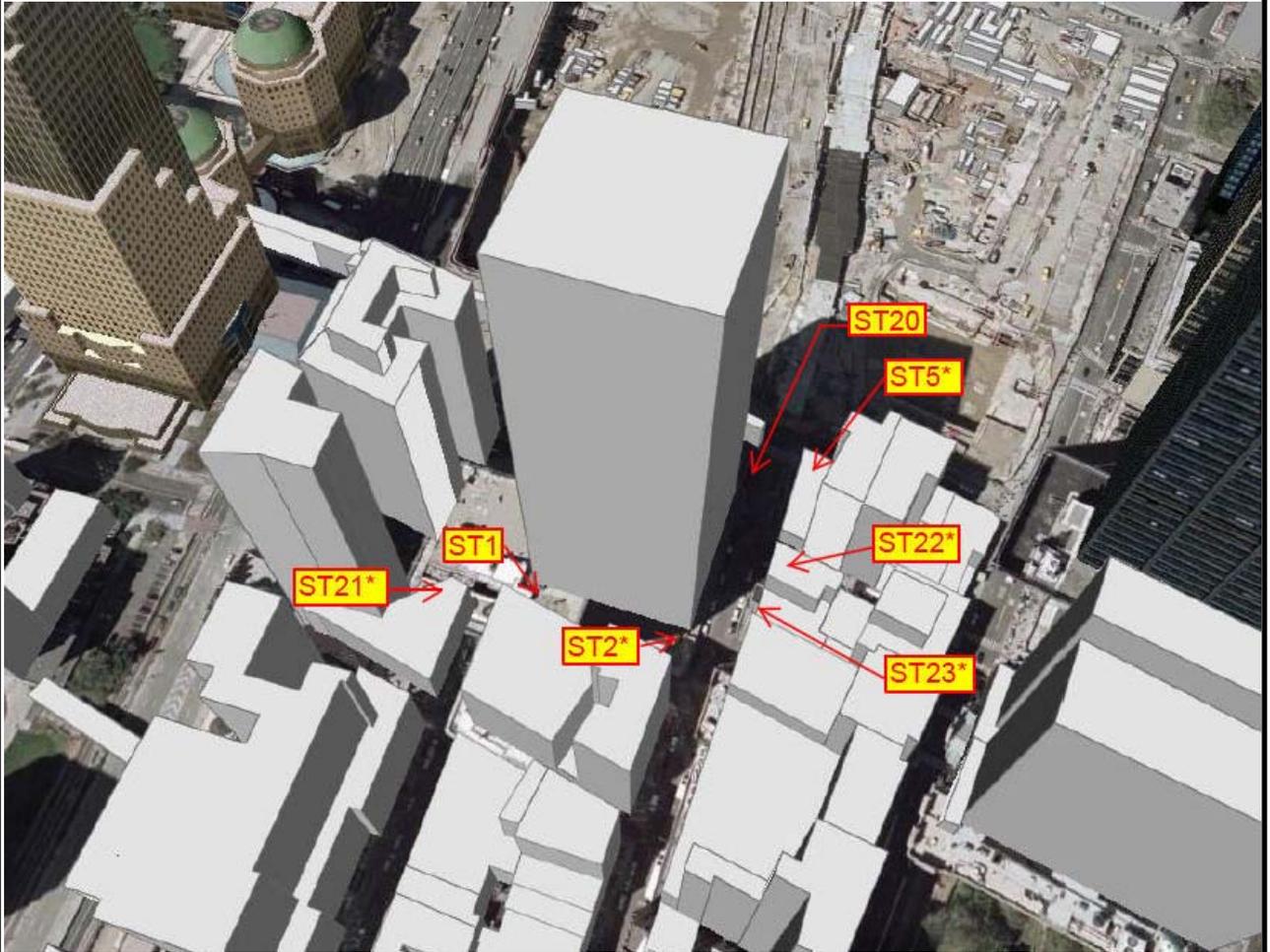
Legend:

- Roof top Stations (Off Site)
- ◻ Roof top and Scaffolding Stations-130 Liberty Street.

Note: The Hotel, Fire Station and 120 Cedar Street Roof Stations will be taken out of service when the deconstruction completes the removal of the concrete slab at the 5th floor. The 110 Greenwich Street and School Stations are no longer in service.

Network Schematic-Locations of Off-Site Elevated Roof -Top Stations and "Floating" Stations on Scaffolding
130 Liberty Street
New York, New York
 Updated Sept, 2010: AMP Amendment #15

 Wannalancit Mills 650 Suffolk Street Lowell, Ma. 01854 (978) 970-5600		FIGURE 2



* Stations 5, 21 and 22 will be taken out of service when the deconstruction completes the removal of the concrete slab at the 5th floor. Station 23 will be installed and put in service when the deconstruction completes the removal of the concrete slab at the 5th floor. Station 2 will be taken out of service when Station 23 becomes operational.

3-Dimensional View of Air Monitoring Stations from The South
 Updated Sept, 2010: AMP Amendment #15

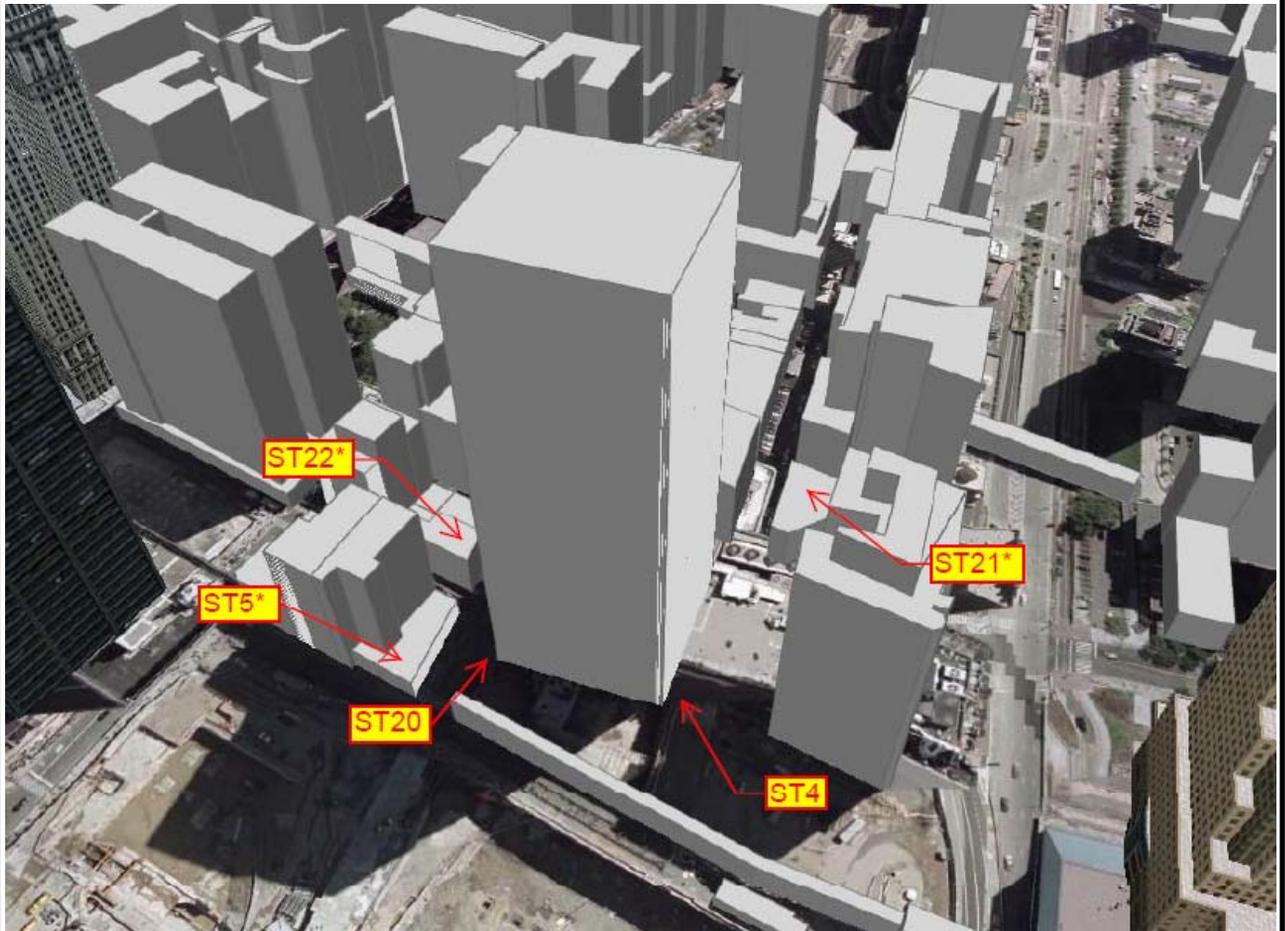


Wannalancit Mills
 650 Suffolk Street
 Lowell, Ma. 01854
 (978) 970-5600

DRAWN: BP
 CHECKED: ED

SCALE: AS SHOWN
 Date 9/17/2010

FIGURE 3



3-Dimensional View of Air Monitoring Stations from the North
130 Liberty Street
New York, New York
 Updated Sept, 2010: AMP Amendment #15



Wannalancit Mills
 650 Suffolk Street
 Lowell, Ma. 01854
 (978) 970-5600

FIGURE
4

Drawn: BP
 Checked: ED

SCALE: None
 Date: 9/17/2010

* Stations 5, 21 and 22 will be taken out of service when the deconstruction completes the removal of the concrete slab at the 5th floor.

**Table 1. Locations of Monitoring Stations – 130 Liberty St.
Deconstruction Air Monitoring Network
Updated: September 2010 (AMP Amendment #15)**

Location #	Description
1	Southwest of building (Washington St./Albany St.) at sidewalk bridge level.
2 ¹²	Southeast of building (Albany St./Greenwich St.) at sidewalk bridge level.
3 ¹	North-northeast of building (Liberty St./Greenwich St.) at ground level.
4	Northwest of building (Washington St./Cedar St.) at ground level.
5 ⁸	Off-site roof top location (124 Liberty Street – FDNY 10-10 House).
6 ²	On-site roof top location (Southwest Area).
7 ²	On-site roof top location (Southeast Area).
8 ²	On-site roof top location (Northeast Area).
9 ²	On-site roof top location (Northwest Area).
10 ³	North side at sidewalk bridge level.
11 ⁶	Off-site roof top location (90 Trinity Place – School).
12 ⁷	Off-site roof top location (110 Greenwich Street)
13 ⁵	Off-site roof top location (85 West Street – Marriott Hotel – 38 th Floor).
14 ⁴	West face – south end at corner, scaffolding level.
15 ⁴	South face – east end at corner, scaffolding level
16 ⁴	East face – north end at corner, scaffolding level.
17 ⁴	North face – west end at corner, scaffolding level.
20	Northeast of building (Cedar St./Greenwich St.) at sidewalk bridge level
21 ⁹	Off-site roof top location (85 West Street – Marriott Hotel – 4 th Floor).
22 ¹⁰	Off-site roof top location (O’Hara’s Restaurant and Pub– 120 Cedar Street- directly across street from 130 Liberty Street – 5 th Floor).
23 ¹¹	Off-site 120 Cedar Street (Greenwich St/Thames St) at sidewalk bridge level.

1 – In use from 9/14/05 through 9/16/05

2 – In use from 9/14/05 through 9/28/05 and 7/6/06 through 9/21/06

3 – In use from 9/16/05 through 01/04/10

4 – In use from 9/14/05 through 5/30/09

5 – In use from 10/5/05 through 4/24/10

6 – In use from 10/5/05 through 7/11/2010

7 – In use from 10/6/05 through 7/20/2010

8 – In use from 9/14/05 until deconstruction of 130 Liberty Street completes removal of concrete slab on the 5th floor

9 – In use from 4/25/10 until deconstruction of 130 Liberty Street completes removal of concrete slab on the 5th floor

10 – In use from 7/12/10 until deconstruction of 130 Liberty Street completes removal of concrete slab on the 5th floor

11 – Will be installed and put in service when the deconstruction completes the removal of the concrete slab at the 5th floor

12- Will be taken out of service when Station 23 becomes operational

**Table 1a (AMP Amendment #15)
Monitoring Station Summary, 130 Liberty Street Deconstruction as of September 2010**

Station	Location Description in Plan	Location Description in QAPP		Actual Location	Actual Level	Start-up Date
		Site Location	Direction From 130 Liberty			
Ambient Air Monitoring Stations						
Station 1	Southwest of building (Washington St./Albany St.) at ground level	Ground Level - Washington Street/Albany Street	Southwest Corner	Southwest Area	Sidewalk Bridge	9/14/2005
Station 2	Southeast of building (Albany St./Greenwich St.) at ground level	Ground Level - Albany Street/Greenwich Street	Southeast Corner	Southeast Area	Sidewalk Bridge	9/14/2005
Station 4	Northwest of building (Washington St./Cedar St.) at ground level	Ground Level - Washington Street/Cedar Street	Northwest Corner	Northwest Area	Street	9/14/2005
Station 5	Off-site roof top location (124 Liberty Street - FDNY 10-10 House)	Roof Top Off Site - 124 Liberty Street/FDNY 10-10 House	Northeast	Firehouse #10	Roof	9/14/2005
Station 10	Not suggested in Plan - Replaced Station 3	Not suggested in QAPP - Replaced Station 3		North Side	Sidewalk Bridge	9/19/2005
Station 11	Off-site roof top location (90 Trinity Place - School)	Roof Top Off Site - 90 Trinity Place - School	Southeast	90 Trinity Place	Roof	10/5/2005
Station 12	Off-site roof top location (110 Greenwich Street)	Roof Top Off Site - 110 Greenwich Street	South	110 Greenwich Street	Roof	10/6/2005
Station 13	Off-site roof top location (85 West Street - Marriott Hotel)	Roof Top Off Site - 85 West Street - Marriott Hotel	Southwest	Marriott Hotel 38th Floor	Roof	10/5/2005
Station 14	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Southwest Corner	West Face - South end at corner	Scaffolding	In effect on 10th floor as of 11/19/05; in effect on 20th floor as of 12/11/05; in effect on 30th floor on 1/10/07; in effect on 20th floor on 3/11/07 with exception of silica which remained on 30th floor until 6/14/07; silica in effect on 29th floor on 6/15/07; in effect on 15th floor on 6/25/07 through 5/30/09 with the exception of silica which floated between the 29th and 22nd floor (**)
Station 15	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Southeast Corner	South Face - East end at corner	Scaffolding	
Station 16	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Northeast Corner	East Face - North end at corner	Scaffolding	
Station 17	Each side at elevation on scaffolding (Phase I and II only)	Scaffolding at Building; Floating Elevation	Northwest Corner	North Face - West end at corner	Scaffolding	
Station 20	Not suggested in Plan - Replaced Station 10	Not suggested in QAPP - Replaced Station 10	Northeast Corner	Northeast Area	Sidewalk Bridge	1/4/2010
Station 21	Not suggested in Plan - Replaced Station 13	Not suggested in Plan - Replaced Station 13	Southwest	Marriott Hotel 4th Floor	Roof	4/25/2010
Station 22	Not suggested in Plan - Replaced Station 11	Not suggested in Plan - Replaced Station 11	East	O'Hara's -120 Cedar Street 5th Floor	Roof	7/12/2010
Station 23	Not suggested in Plan - Replaced Station 2	Not suggested in Plan - Replaced Station 2	East	120 Cedar Street Sidewalk Bridge	Sidewalk Bridge	Will be installed and put in service when the deconstruction completes the removal of the concrete slab at the 5th floor.
Meteorological Monitoring Stations						
Roof Station	Roof top of 130 Liberty Street until onset of deconstruction, at which point the station will be collocated with one of the off site rooftop air monitoring stations	Roof top of 130 Liberty Street until onset of deconstruction, at which point the station will be collocated with one of the off site rooftop air monitoring stations		Building Roof	Roof	In effect as of 9/14/05. Moved to the Marriott Hotel roof, 38th floor on 2/27/07. Moved to the Marriott Hotel roof, 4th floor on 4/25/10.
Ground Station	Not Suggested in Plan	Not Suggested in Plan		North Side	Sidewalk Bridge	11/2/2005 - station relocated 1/4/2010
Ground Station	Not Suggested in Plan	Not Suggested in Plan		Northeast Area	Sidewalk Bridge	1/4/2010

Notes:

There was a minor move of the Meteorological Ground Level Station on 4/24/2007 due to construction logistics; however, the location description remains the same.

Stations 3, 6, 7, 8, 9, 12, 13, 14, 15, 16, and 17 are no longer in service. Station 10 is out of service as of 1/4/10 when Station 20 commenced.

Station 11 is out of service as of 7/11/10 when Station 22 commenced.

Stations 5, 21 and 22 will be out of service when deconstruction completes removal of the concrete slab on the 5th floor.

Station 2 will be out of service when Station 23 becomes operational.

Station 23 will be installed and put in service when the deconstruction completes the removal of the concrete slab at the 5th floor.

Station 12 is out of service as of 7/20/10 when deconstruction completed removal of the concrete slab on the 12th floor.

** As per the Ambient Air Monitoring Plan Amendment #5, the location of the silica monitors will move with deconstruction.

Plan - Ambient Air Monitoring Plan, Section 2 of the Deconstruction Plan submitted September 7, 2005

QAPP - Ambient Air Monitoring Quality Assurance Project Plan