



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

November 24, 2010

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

Re: November 23, 2010 Proposed Amendment #17 – Ambient Air Monitoring Program Plan and November 23, 2010 Proposed Amendment #17 - 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 November 23, 2010 Proposed Amendment #17 to the September 7, 2005 Section 2 – Ambient Air Monitoring Program Plan of the 130 Liberty Street Abatement and Deconstruction Project and the November 23, 2010 Proposed Amendment #17 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 (NYS DOL) 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,



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 17

DATE FORM SUBMITTED: 11/23/10

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

AMENDMENT #17

For the reasons described below, several of the air monitoring stations require relocation in order to complete the deconstruction of 130 Liberty and facilitate other projects in the vicinity. This Amendment describes the locations and presents the rationale for the location/relocation of the air monitoring stations for the duration of deconstruction activities. It is anticipated that these are the final locations for the remainder of the project.

Station #2 is currently in the Southeast corner of the site at the sidewalk bridge level. As per Amendment #15, this station was scheduled to be taken out of service when the removal of the concrete slab at the 5th floor elevation was completed and the 120 Cedar Street sidewalk bridge level station became operational. However, use of the 120 Cedar Street sidewalk bridge station is no longer possible because of access and safety concerns. Therefore, Station #2 will remain in its current location and will not be relocated, as per Amendment #15.

Station #4 is currently in the Northwest corner of the site (Washington St./Cedar St.) at street level. Station #4 is physically on the ground immediately adjacent to the truck platform. Bovis has indicated that in its current location it will interfere with the remaining deconstruction activities and has requested that it be relocated. Station #4 will be relocated to the top of the sidewalk bridge on the east side of Washington Street south of the Cedar Street gate. This portion of the sidewalk bridge will remain in place until the end of deconstruction. This relocation will involve moving Station #4 approximately 15 feet to the southwest and from ground/street-level to the top of the 8-foot high bridge. This new station will be referred to as Station #23.

Station #20 is currently in the Northeast corner of the site at the sidewalk bridge level. This station needs to be relocated as the pedestrian sidewalk bridge will be removed for upcoming utility work unrelated to the 130 Liberty project. Station #20 will be relocated to the roof top of the two-story Firehouse 10-10 House on 124 Liberty Street. This is the former Station #5 which was recently taken out of service when the removal of the concrete slab at the 5th floor elevation was completed. Therefore, this relocation will result in the restoration of Station #5. Station #20 will be taken out of service after Station #5 is put back into service prior to the sidewalk bridge removal.

Station #200 is the quality assurance location which is collocated with Station #20. Station #200 will be relocated to be collocated with Station #2. The meteorological tower which is currently located at Station #20 will also be relocated to Station #2. The quality assurance station will be referred to as Station #2000.

Station #1 is currently in the Southwest corner of the side at the sidewalk bridge level. This station is unaffected by this amendment and will remain in this location for the remainder of the project.

SECTION 2 – AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM: ISSUE 17

Sections of Air Monitoring Plan Affected:

Amendment #15, Section 2.3 Location of Monitoring Stations: This section will be revised to include the new locations for Stations #23 and #2000.

Amendment #15, Figure 1 (Site Location Map and Proposed Ambient Air Monitoring Locations): This figure will change due to the future elimination of Stations #4 and #20 and the revised location of Station #23 which was originally proposed in Amendment #15. Footnotes on this figure will be revised, as appropriate. A revised Figure 1 is attached to this Amendment.

Amendment #15, Figure 2 (Network Schematic): The footnote on this figure will be revised to include the restoration of the Fire Station location (Station #5).

Amendment #15, Figure 3 (3-Dimensional View of Air Monitoring Stations from the South): This figure will change due to the future elimination of Station #20. Station #23 which was proposed in Amendment #15 will be removed from this figure. Footnotes on this figure will be revised, as appropriate. A revised Figure 3 is attached to this Amendment.

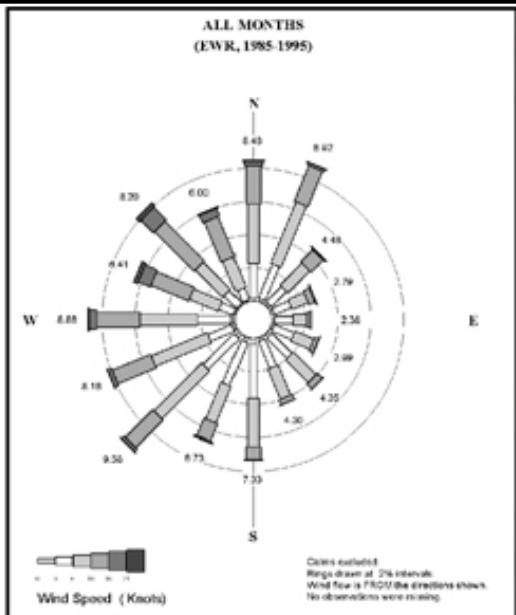
Amendment #15, Figure 4 (3-Dimensional View of Air Monitoring Stations from the North): This figure will change due to the future elimination of Stations #4 and #20 and the addition of Station #23. Footnotes on this figure will be revised, as appropriate. A revised Figure 4 is attached to this Amendment.

Amendment #15, Table 1 (Locations of Monitoring Stations): The table has been updated to include footnotes for Stations #4, #5, #20, and #23 showing the new dates of operation and the revised location for Station #23 which was originally proposed in Amendment #15. A revised Table 1 is attached to this Amendment.

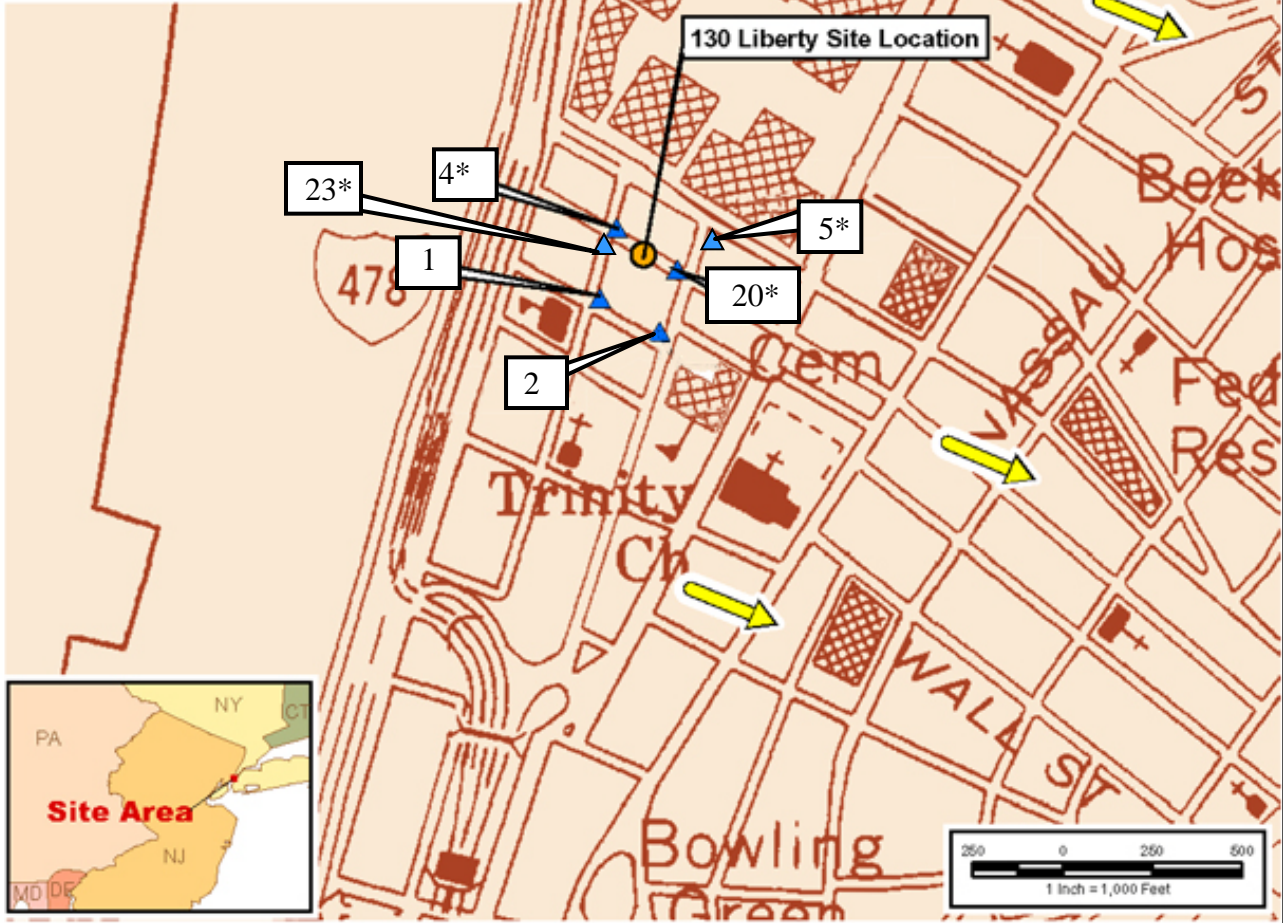
Amendment #15, Table 1a (Monitoring Station Summary): The table has been updated to include revised dates of operation for Stations #4, #5, #20, and #23 and the revised locations for the meteorological ground level station and Station #23 which was originally proposed in Amendment #15. A revised Table 1a is attached to this Amendment.

Amendment #15, Table 5 (Phase II – Structural Deconstruction Phase Sampling and Analysis Summary): Column 1 of this table will be revised to show that one roof top location will be sampled and three ground/street level samples will be sampled. Changes regarding target parameters and sampling frequencies are addressed in Amendments #13 and #14.

Date Implemented: December 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

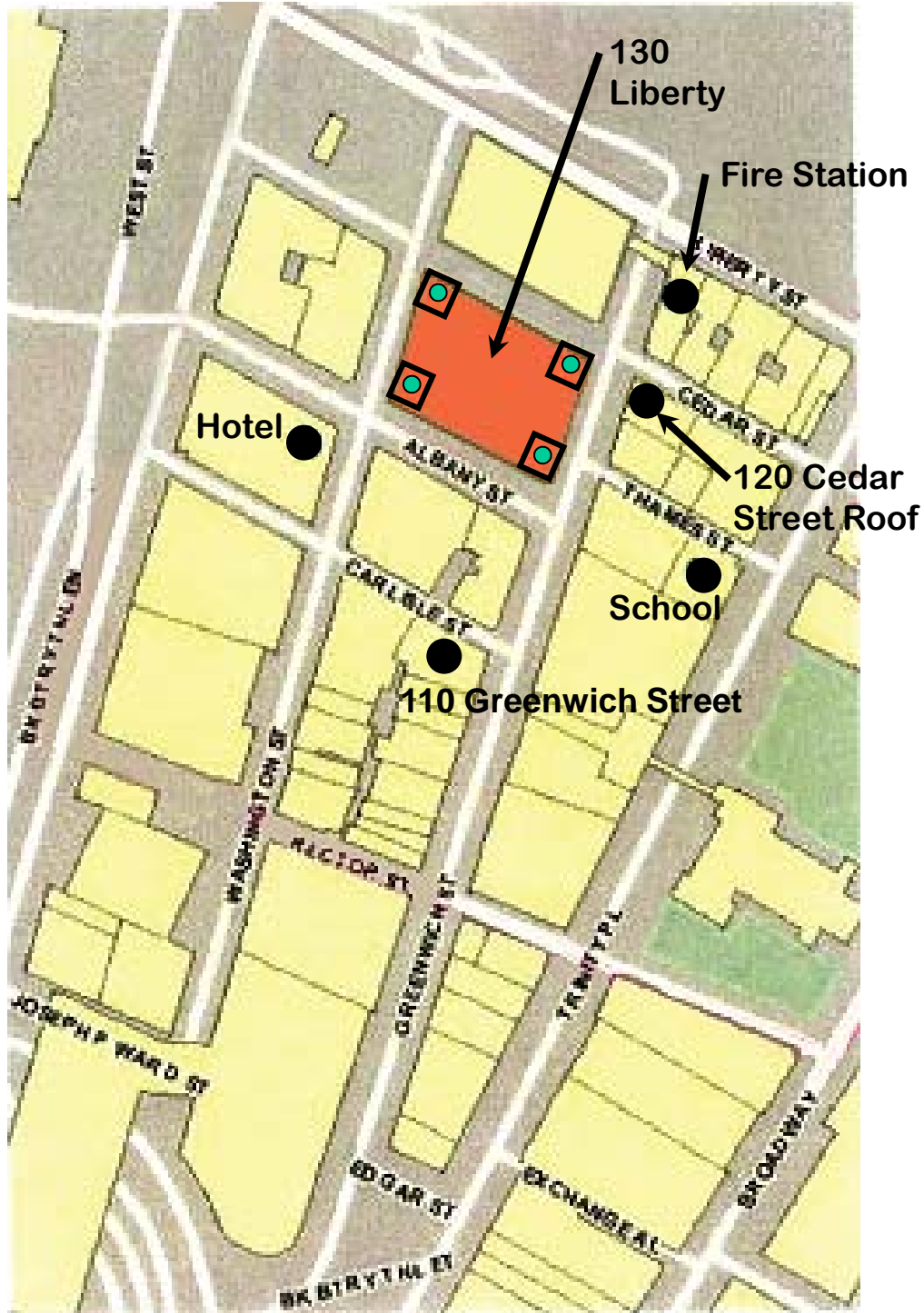
* Station 20 will be taken out of service when service to Station 5 is restored.
 Station 4 will be taken out of service when Station 23 becomes operational.

**Site Location Map for
 Ambient Air Monitoring Locations
 130 Liberty Street
 New York, New York
 Updated Nov, 2010: AMP Amendment #17**

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

Drawn: BP
 Checked: ED
 SCALE: AS SHOWN
 Date 11/23/2010

**FIGURE
 1**



Legend:

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

Note: All Off-Site Elevated Roof-Top Stations and "Floating" Stations on Scaffolding are no longer in service. The Fire Station will be restored to service as described in this Amendment.

**Network Schematic-Locations of Off-Site Elevated Roof -Top Stations and "Floating" Stations on Scaffolding
130 Liberty Street
New York, New York**

Updated November, 2010: AMP Amendment #17

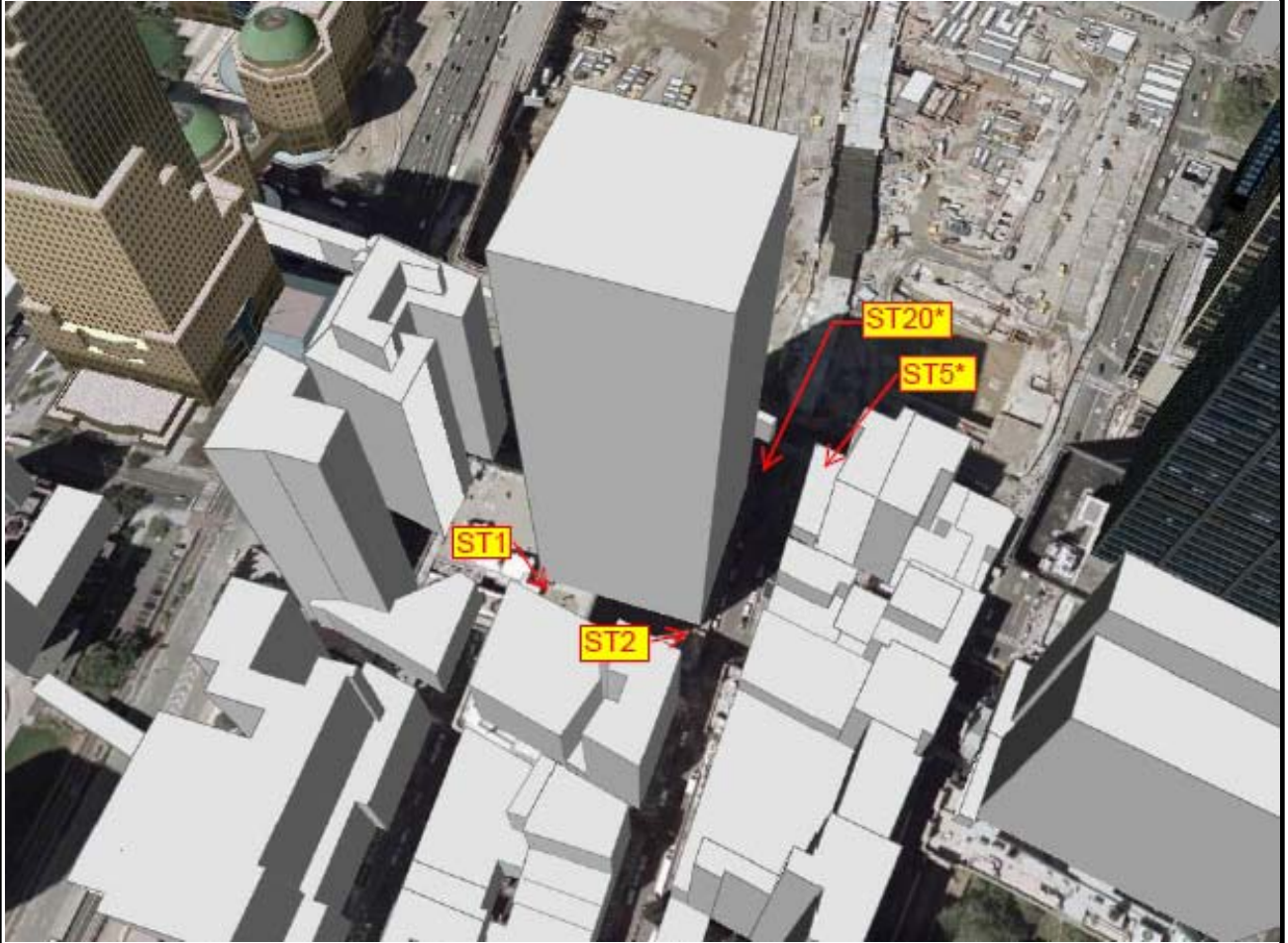


Wannalancit Mills
650 Suffolk Street
Lowell, Ma. 01854
(978) 970-5600

DRAWN:BP
CHECKED: ED

SCALE: AS SHOWN
Date 11/23/2010

**FIGURE
2**



* Station 20 will be taken out of service when service to Station 5 is restored.

3-Dimensional View of Air Monitoring Stations from The South
 Updated Nov, 2010: AMP Amendment #17

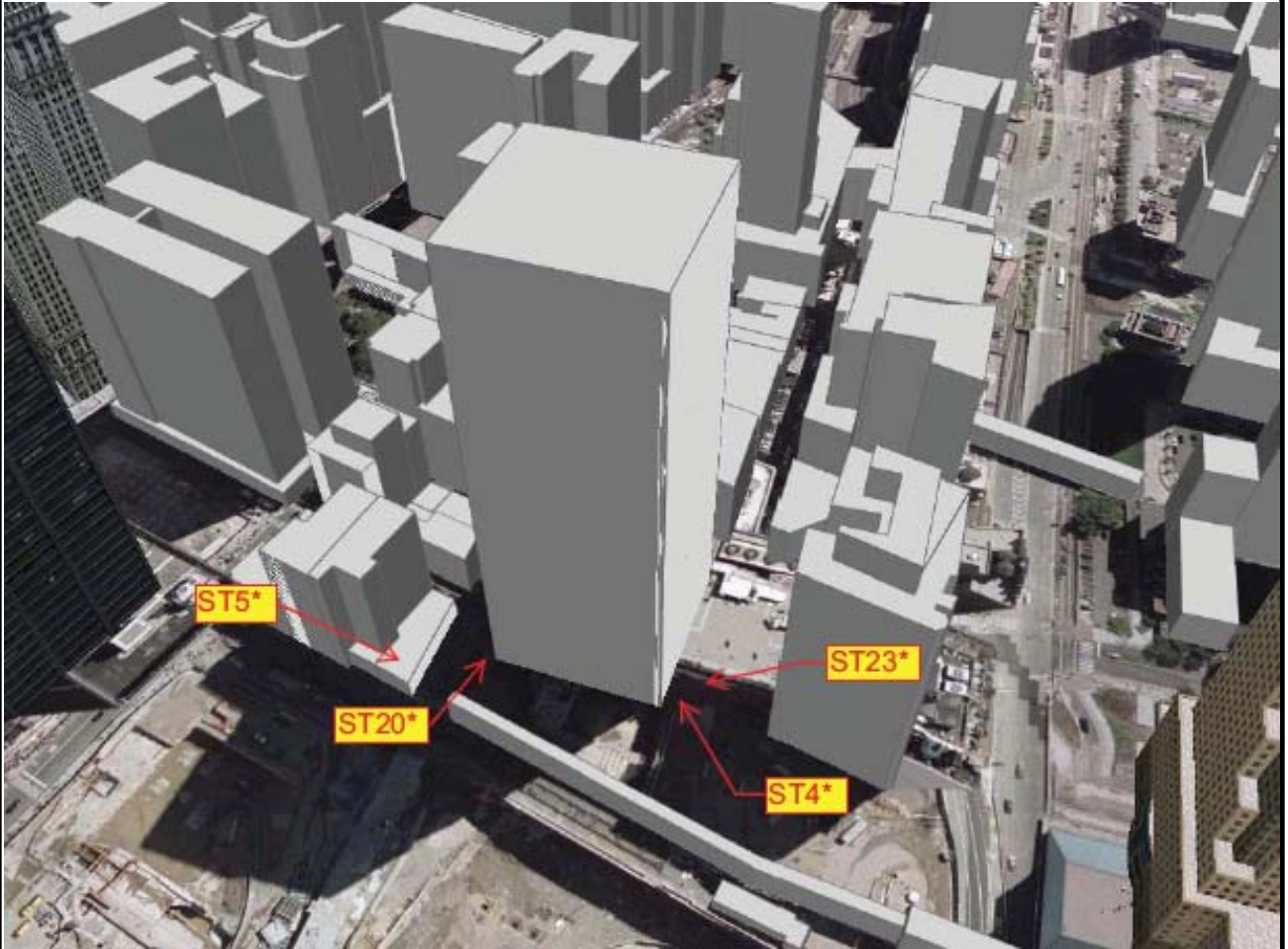


Wannalancit Mills
 650 Suffolk Street
 Lowell, Ma. 01854
 (978) 970-5600

FIGURE 3

DRAWN: BP
 CHECKED: ED

SCALE: AS SHOWN
 Date 11/23/2010



3-Dimensional View of Air Monitoring Stations from the North
130 Liberty Street
New York, New York
 Updated Nov, 2010: AMP Amendment #17

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

FIGURE
4

Drawn: BP	SCALE: None
Checked: ED	Date: 11/23/2010

* Station 20 will be taken out of service when service to Station 5 is restored.
 Station 4 will be taken out of service when Station 23 becomes operational.

**Table 1. Locations of Monitoring Stations – 130 Liberty St.
Deconstruction Air Monitoring Network
Updated: November 2010 (AMP Amendment #17)**

Location #	Description
1	Southwest of building (Washington St./Albany St.) at sidewalk bridge level.
2	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 ¹²	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 ¹³	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	Northwest of building (Washington St./Cedar 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 through 11/16/10; will restore service to this station prior to the decommission of Station 20

9 – In use from 4/25/10 through 11/16/10

10 – In use from 7/12/10 through 11/16/10

11 – Will be installed and put in service prior to the decommission of Station 4

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

13- Will be taken out of service when service to Station 5 is restored

Table 1a (AMP Amendment #17)
Monitoring Station Summary, 130 Liberty Street Deconstruction as of November 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 4	Not suggested in Plan - Replaced Station 4	Northwest	Northwest Area	Sidewalk Bridge	Will be installed and put in service prior to the decommission of Station 4.
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.

The Meteorological roof top station was taken out of service on 11/16/10.

The Meteorological Ground Level station will be relocated to Station 2 when Station 20 is taken out of service.

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 are out of service as of 11/16/10 when deconstruction completed removal of the concrete slab on the 5th floor.

Station 4 will be out of service when Station 23 becomes operational.

Station 20 will be out of service when service is restored to Station 5.

Station 23 will be installed and put in service prior to the decommission of Station 4.

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