



November 13, 2009

Mr. Arnel Javal
TRC Environmental
130 Liberty Street Field Office
New York, NY 10006

RE: Proposed revision to the May 14, 2009 approved Decontamination and Deconstruction Implementation Plan

Dear Mr. Javal,

This letter identifies revisions to the May 14, 2009 approved Implementation Plan addressing USEPA, USOSHA, NYSOL, NYCDEP, NYCDOB and FDNY comments.

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Page 4 of 33 Section I.A.11 insert new second sentence as follows:

"Prior to commencement of deconstruction the existing black mesh enclosure on the outboard side of the scaffold was removed and replaced with a new blue fire retardant mesh enclosure"

Page 4 of 33 Section I.A.12 delete in its entirety and replace with the following:

"A dual car, personnel/material construction hoist is located on the North face of the building. During decontamination this hoist provided access to a clean vestibule area on each unabated floor. Vestibule dimensions were approximately 26'x26'. Following the decontamination of a given floor and during deconstruction activities this hoist will provide access to a given floor below deconstruction. The South Hoist was removed from service, and has been removed from the building."

Page 7 of 33 Section I.E replace existing paragraph 2 with new paragraph as described below:

"NYCDEP Asbestos Project Notification (ACP7) and/or NYCDEP Not an Asbestos Project Notification (ACP5)"

Page 7 of 33 Section I.F delete the word "temporary" before the word "water", insert "temporary" before the word electric, and insert the words "and deconstruction" before the word "process" as follows:

"Utilities shall be disconnected and capped prior to decontamination, with the exception of water, sewer and temporary electric, which shall be maintained by the General Contractor (Bovis) during the decontamination and deconstruction process".

Page 9 of 33 Section II.E delete the Deconstruction Site Logistics plan and replace with the following:

Updated logistics plan (see attachment)

Page 19 of 33 Section III.AA add the following phrase to the end of the sentence:

"and barriers or shaft covers"

Page 22 of 33 Section V.C.4 delete the words "and transfer corridor(s)" from the sentence .

Page 24 of 33 Section V.C. insert new paragraph 12 as follows:

"Combustible materials for deconstruction which are not staged for immediate use will be stored and secured on site outside the footprint of the building."

Page 24 of 33 Section V.D.3 delete the words "two floors" and replace with:

"up to four floors"



Page 25 of 33 Section V.D.9 replace the parenthetical in the second sentence as follows:

"(excluding certain portions of the southwest portion of the 1st floor, the 5th floor MER and the horizontal portions of the 18th floor expansion loop)"

Page 25 of 33 Section V.D.10 delete in its entirety and replace with the following:

- "10 The structural steel frame shall be removed as follows:*
- a. Mini-cranes shall be used to support the steel members.*
 - b. Once a steel member is rigged to the mini-crane, each end shall be cut in its entirety.*
 - c. Steel members, once fully cut on both ends and free, shall then be lowered to the floor slab below.*
 - d. Only enough steel members shall be cut that can be safely removed in a single work shift. Structural steel cutting shall be performed by qualified workers located in boom lifts.*
 - e. Structural steel members shall be moved around the floor using small excavators and rubber tire loaders.*
 - f. The cut structural steel shall be placed in specified metal containers, using small excavators and rubber tire loaders. The metal containers will be lifted from the building by the tower crane and placed in the north plaza lay down area as shown on the latest site logistics plan.*
 - g. Building perimeter shall have two 9/16" diameter steel cables secured to the steel columns located 1'-6" and 2'-0" feet off the top of the slab to prevent equipment from running over the edge. Equipment shall also be protected from falling at the perimeter of the building by stop-logs or curbs until otherwise approved by OSHA.*
 - h. Prior to cutting operations for the steel perimeter columns, a spark shield/slag deflector made of non-combustible materials such as metal shall be inserted between the cut and the perimeter plywood to divert sparks and slag away from the plywood. A burning blanket will be temporarily suspended on the scaffolding in the area of column and placed around the column at its base. The spark shield/slag deflector once installed will divert the slag toward the burning blanket at the base and curtain suspended on the scaffolding. The burning blanket will be fastened to the scaffolding using #9 tie wires run through the manufacturers' installed grommets. The burning blankets will be moved and re-installed as the torch-cutting work progresses.*
 - i. Prior to cutting operations for the steel spandrel beams, suspended and strategically placed burning blankets shall be suspended on the scaffolding in the area outside of the perimeter columns and spandrel beams as required to control slag and sparks. The burning blanket will be fastened to the scaffolding using #9 tie wires, run through the manufacturers' installed grommets. The burning blankets will be moved and re-installed as the torch-cutting work progresses. Placement of the burning blankets shall be performed by competent workers located in boom lifts.*
 - j. Plywood protection will be thoroughly and continually wetted in the immediate area of each cutting operation immediately prior to and during that operation."*

Page 26 of 33 Section V.D.11 delete the words "(see Figure 3)" and replace with the following:

"as shown on the latest site logistics plan in Section II.E. above"

Page 26 of 33 Section V.D.12 delete the second sentence and replace with the following:

"During burning operations and in accordance with Section F. Fire Protection below, a fire watch and burner shall be present (with FDNY certificates of fitness) for each torch operation. In addition, there shall be for the first four torch operators on the deconstruction floor a corresponding number of fire watch on the floor immediately below the deconstruction floor; above four torch operators on the deconstruction floor, there shall be a minimum of four fire watch on the floor immediately below the deconstruction floor, with additional fire watch as determined by FDNY based on field conditions. There shall also be one fire watch on each of the four floors below the floor immediately below the deconstruction floor. Additionally, until all burning operations are complete on the 26th floor, in addition to the fire watch described above, an additional fire watch will be stationed on the 20th floor."



Page 26 of 33 Section V.D.14 delete the words “(see Figure 3)” and replace with the following:

“as shown on the latest site logistics plan in Section II.E. above”

Page 26 of 33 Section V.D.16 delete in its entirety and replace with the following:

- “16. Concrete floor slabs shall be deconstructed using remote operated hydraulic hammers and sent to the floor slab below as follows:
- a. Concrete slabs shall be chopped through using remote hydraulic hammers and sent to the floor below. Spotters and supplemental protection in the form of barricades, shaft covers, railings, caution tape, spray paint demarcation, and curbing will be utilized to keep personnel and equipment away from working edge. At a minimum, building perimeter shall have two 9/16” diameter steel cables secured to the steel columns located 1'-6” and 2'-0” off the top of the slab to prevent equipment from running over the edge. Equipment shall also be protected from falling at the perimeter of the building by stop-logs or curbs until otherwise approved by OSHA. Likewise, no personnel shall be allowed within 6 feet of an unprotected edge unless fall protection is utilized in all instances. The hierarchy of fall protection shall be employed (i.e. – prior to the use of personal fall arrest systems, fall hazards shall be controlled through engineering controls such as covers, guards, and full protected work platforms.
 - b. Metal decking shall be separate from structural steel and sent to the floor slab below.
 - c. Concrete and metal decking material shall be moved using small excavators and rubber tire loaders.
 - d. Concrete and metal decking material shall be placed in specified metal containers using small excavators and rubber tire loaders. The metal containers will be lifted from the building by the tower crane and placed in the north plaza lay down area as shown on the latest site logistics plan.
 - e. An exclusion zone will be established 6 feet away from each leading edge. Concrete slab deconstruction will be executed with remote control demolition equipment so that the operator will not enter the exclusion zone.”

Page 27 of 33 Section V.D.17 delete the words “(see Figure 3)” and replace with the following:

“as shown on the latest site logistics plan in Section II.E. above”

Page 28 of 33 Section V.D.19 delete in its entirety and replace with the following:

“Throughout the work day, the work area shall be inspected and maintained to ensure that no light or loose materials are left out in the open. All material and equipment that could potentially become airborne due to high winds (plywood, scaffolding and metal decking) will be secured in accordance with industry standards and accepted practices. These means and methods include, but are not limited to, the use of chains, straps and equipment and other heavy materials to weigh down and secure components that have the potential to become airborne. No material or equipment will be stored within one column bay from the perimeter of the building.”

Page 28 of 33 Section V.D.21 insert at the beginning of the first sentence before the word “A” the following:

“Until such time as a sidewalk shed is erected”

Page 29 of 33 Section V.E.7.b. delete in its entirety and replace with the following:

“Mini-excavators, rubber-tired loaders and remote operated hydraulic hammers shall be used to complete the interior deconstruction at each floor level”.

Page 30 of 33 Section V.E.7.c.vi. delete the words “or Steel Cable Chokes” in the first sentence.



Page 30 of 33 Section V.E.7.c. insert new paragraph vii as follows:

"vii Mini-cranes – To be used to support structural steel columns, beams and girders while being torch cut and then used to lower steel to floor slab below."

Page 30 of 33 Section V.F.3. insert in the fourth sentence after the word "Bovis", the following:

"Cosentini Associates the EOR for the standpipe,"

Page 31 of 33 Section V.H.3. delete the first two sentences and replace with the following:

"During the deconstruction process, a concrete crushing machine will be used either in the basement or on the north "coin vault" concrete roof slab."

Attachments: Figure 3 delete its entirety.

Your immediate attention and help is greatly appreciated.

Regards,

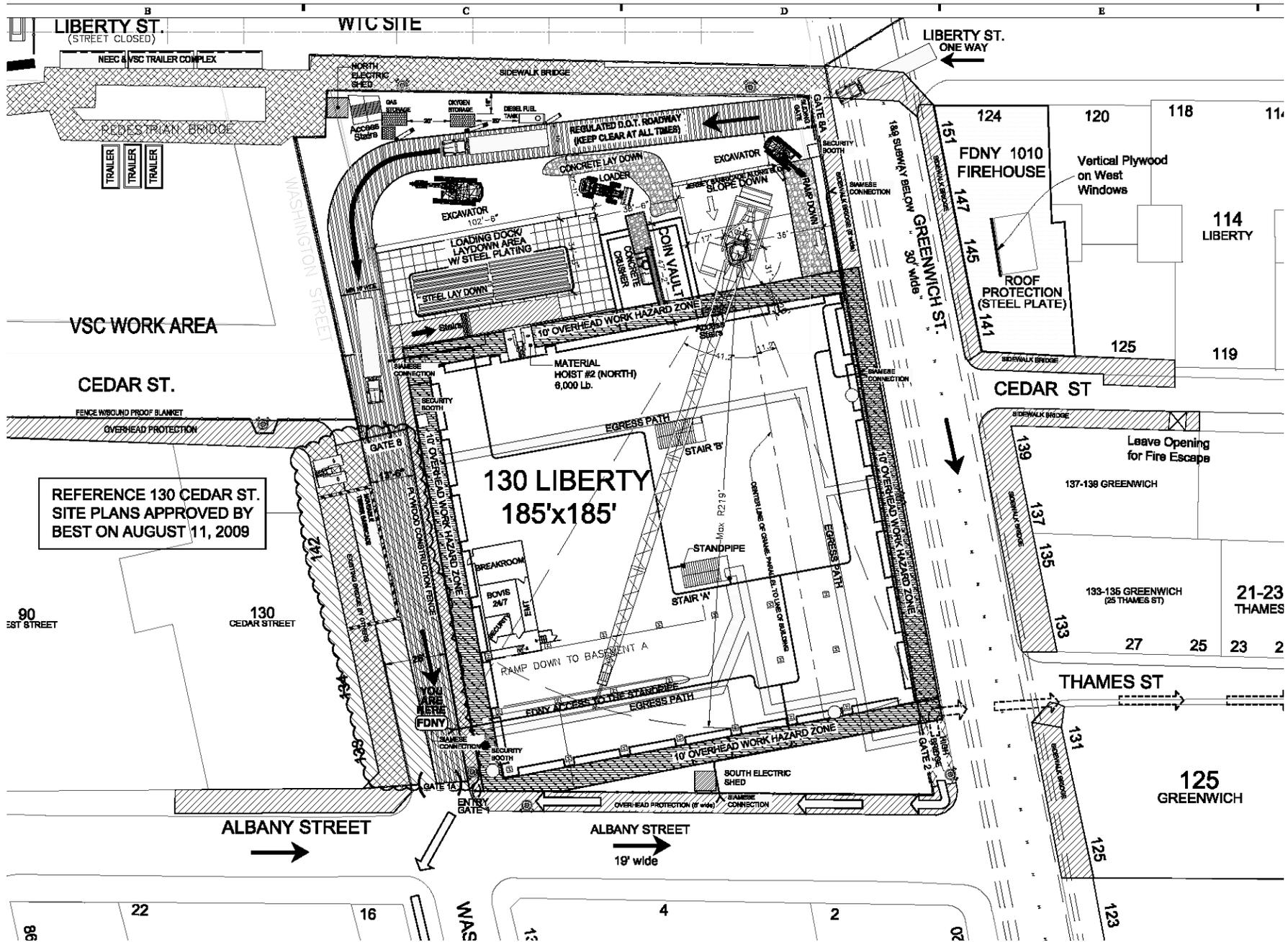
A handwritten signature in black ink that reads "Fred Burkhardt".

On behalf of and for purposes of implementation plan submission only

Bovis Lend Lease, Inc.

Cc: S. Sommer, BLL
E.J. Ignacio, BLL
R. Johnson, LVI

Attachment: Deconstruction logistics Plan



Deconstruction Site Logistics Plan