



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

June 18, 2010

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

Re: June 18, 2010 Proposed Amendment #12 – Ambient Air Monitoring Program Plan and June 18, 2010 Proposed Amendment #12 - 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. Gerdtz:

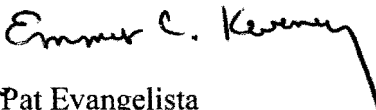
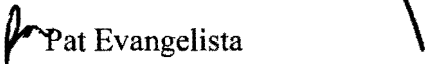
This is to inform you that the U.S. Environmental Protection Agency (EPA) has completed its review of the June 18, 2010 Proposed Amendment #12 to the September 7, 2005 Section 2 – Ambient Air Monitoring Program Plan of the 130 Liberty Street Abatement and Deconstruction Project and the June 18, 2010 Proposed Amendment #12 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,



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

QAPP AMENDMENT FORM: Amendment # 12

DATE FORM SUBMITTED: 06/18/10

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

AMENDMENT #12

This Amendment presents off-site community monitoring locations and elevations to be used during the balance of the deconstruction activities, including the rationale for their selection and installation/removal schedule.

Reason for Amendment:

Four (4) community monitoring stations located off-site have been in use since the 130 Liberty Street air monitoring program began in 2005. These locations are as follows:

- FDNY 10-10 House - 124 Liberty Street – Roof of 2 story structure (Station #5)
- Marriott Hotel - 85 West Street - 38th Floor Roof (Station # 13)
- School - 90 Trinity Place - roof of 14th floor (Station #11)
- 110 Greenwich Street – Apartment Building - roof of 13th Floor (Station # 12)

These elevations were suitable for monitoring in the vicinity of what was originally a 40 story structure. As the deconstruction of the building has progressed, some of these locations are no longer suitable for monitoring off-site. Further, developments in the neighborhood have also rendered certain locations no longer suitable for monitoring off-site. This Amendment presents monitoring locations to be used during the balance of the deconstruction activities as well as the rationale for their selection.

Proposed Off-Site Community Monitoring Stations and Rationale for Selection:

Three (3) locations are proposed as follows:

- FDNY 10-10 House - 124 Liberty Street – Roof of 2 story structure (Station #5). Site location and roof elevation still representative for use as off site monitoring station.
- Marriott Hotel - 85 West Street - 4th floor roof landing. Site location still representative for use as off-site monitoring station. Lower elevation landing was identified for use as a suitable monitoring station in the early stages of the program. Electrical service has been installed and hotel management continues to be an accommodating host. This station was relocated and in operation on April 25, 2010 at the request of the USEPA, prior to issuance of this Amendment to the QAPP.
- O'Hara's – 120 Cedar Street – Roof of 5 story building directly across the street from 130 Liberty Street.

Selection of proposed monitoring locations was based upon walks in the vicinity of 130 Liberty Street performed by TRC staff during the month of April 2010, review of current building placement and use of roof space in the immediate vicinity of 130 Liberty Street. The following site-specific information was

QAPP AMENDMENT FORM: Amendment # 12

considered:

- 90 Trinity Place and 110 Greenwich Street are not at suitable elevations as the height of 130 Liberty Street is lowered (e.g., 14th floor and below). Based upon site visits to the roof tops of these properties, no locations could be identified at lower elevations suitable for use as monitoring locations. All roof tops viewed in the line of sight to 130 Liberty Street were either blocked by the “W” hotel (new construction), were in use as tenant common areas or were at elevations not suitable for use moving forward.
- The only available locations at a suitable elevation south and east of the property were situated directly across the street from 130 Liberty Street. All candidate locations are in close proximity to one another and in the immediate vicinity of existing on-site ground level stations.

Schedule for Installation/Removal:

- Fire Station - continued use no installation necessary
- Marriott Lower Landing – station installed and operational on April 25, 2010
- 120 Cedar Street - Installation date June 2010
- 110 Greenwich Street (Station #12) - will be taken out of service at such time that removal of the concrete slab at the 12th floor elevation is completed.
- 90 Trinity Place (Station #11) - will be taken out of service once the 120 Cedar roof top station becomes operational; this will occur on a non-working day.

Sections of QAPP Affected:

Figure 7-1 (Site Location Map and Proposed Ambient Air Monitoring Locations): This figure will change due to the relocation of Station #13 (revised to Station #21), the future elimination of Stations #11 and #12, and the future addition of a new Station (#22) on the roof of 120 Cedar Street. A revised Figure 7-1 is attached to this Amendment.

Figure 7-2 (Network Schematic): This figure will change due to the future elimination of the School and 110 Greenwich Street roof-top locations, and the future addition of a new Station on the roof of 120 Cedar Street. A revised Figure 7-2 is attached to this Amendment.

Table 7-3 (Phase II – Structural Deconstruction Phase Sampling and Analysis Summary): Column 1 of this table will be revised to show that only 3 roof top locations will be sampled. Changes regarding target parameters and sampling frequencies are addressed in Amendments #13 and #14.

Table 14-1 (Sample Numbering Scheme): This table has been updated to include Stations #21 and #22 and up-to-date information on the operation dates of the remaining stations. A revised Table 14-1 is attached to this Amendment.

Amendment #10, Table 7-4a (attached to this Amendment): The table has been updated to account for the new Stations #21 and #22. The actual location of the roof top meteorological station has also been modified as it has been moved to the 4th floor roof top of the Marriott Hotel.

Amendment #7, Figure 7-3 (attached to this Amendment): This figure has been updated to show the future elimination of Stations #11 and #12 and the addition of Stations #21 and #22. Station #11 will remain on the figure until Station #22 becomes operational.

Amendment #10, Figure 7-4 (attached to this Amendment): This figure has been updated to remove Station #13 and show new Stations #21 and #22.

Date Implemented: June 2010

Table 7-4a (QAPP Amendment #12)
Monitoring Station Summary, 130 Liberty Street Deconstruction as of June 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	
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, 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 13 is out of service as of 4/25/10 when Station 21 commenced. Station 11 will be out of service when Station 22 commences.

Station 12 will be out of service when deconstruction completes removal of the concrete slab on the 12th floor.

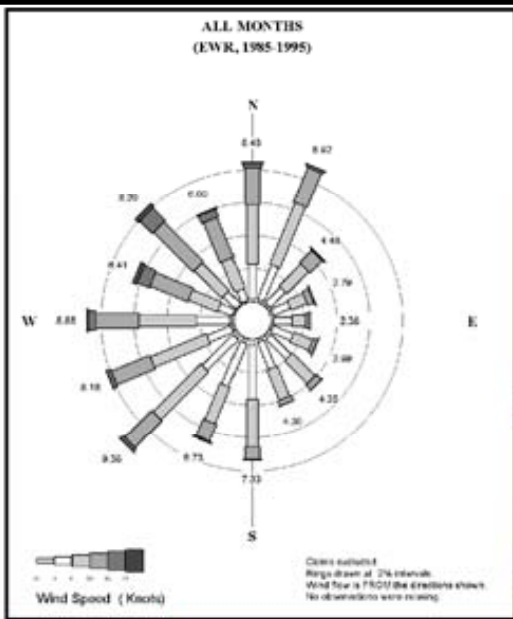
** As per the Ambient Air Monitoring Plan Amendment #5, the location of the silica monitors will move with deconstruction.

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

QAPP - Ambient Air Monitoring Quality Assurance Project Plan

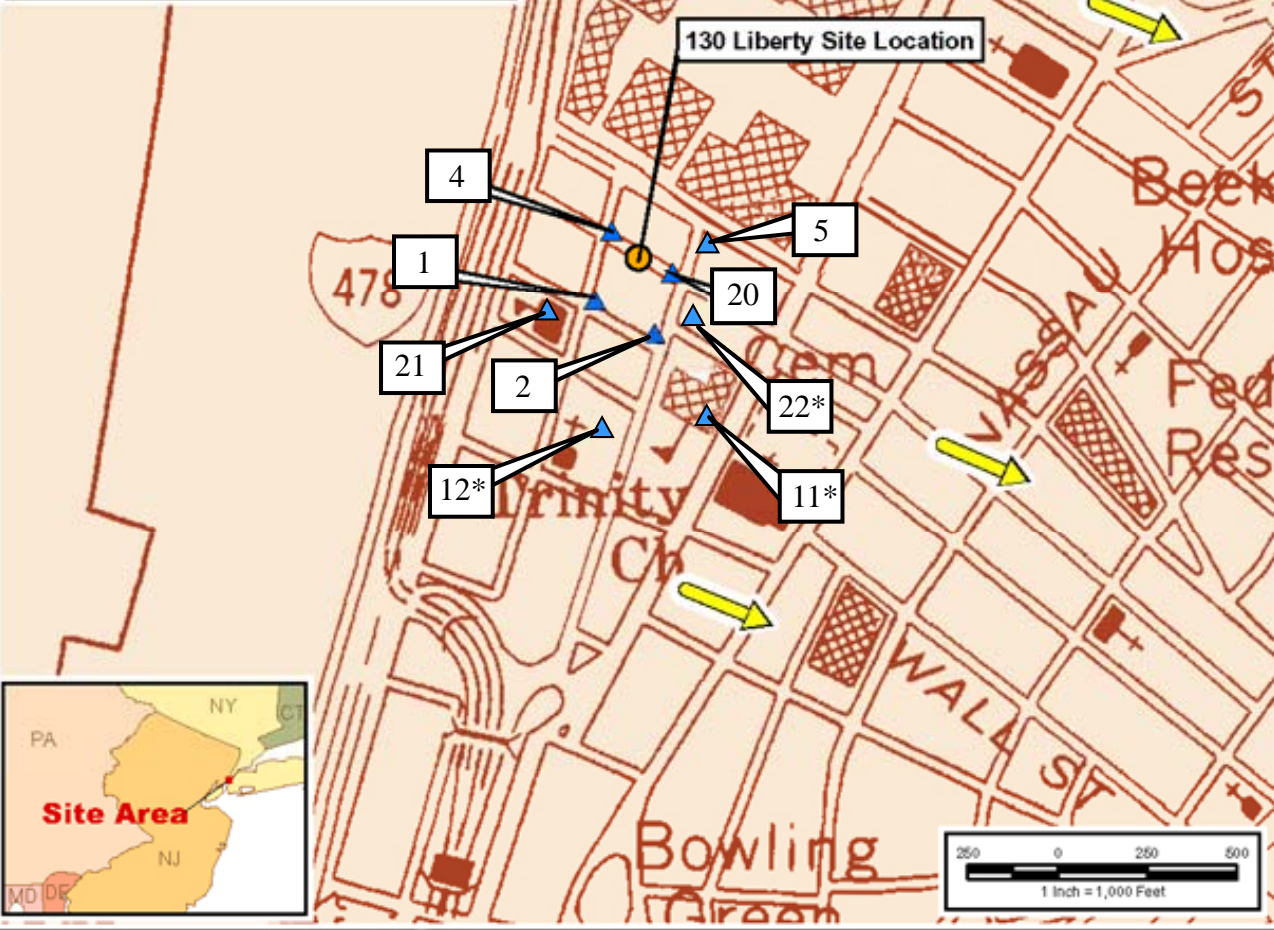
Table 14-1. Sample Numbering Scheme
Updated: June 2010 (QAPP Amendment #12)

Sample Locations	Numbering Scheme
Station 1	parameter – ST 1 – mmddyy
Station 2	parameter – ST 2 – mmddyy
Station 3 ¹	parameter – ST 3 – mmddyy
Station 4	parameter – ST 4 – mmddyy
Station 5	parameter – ST 5 – mmddyy
Station 6 ²	parameter – ST 6 – mmddyy
Station 7 ²	parameter – ST 7 – mmddyy
Station 8 ²	parameter – ST 8 – mmddyy
Station 9 ²	parameter – ST 9 – mmddyy
Station 10 ³	parameter – ST 10 – mmddyy
Station 11 ⁶	parameter – ST 11 – mmddyy
Station 12 ⁷	parameter – ST 12 – mmddyy
Station 13 ⁵	parameter – ST 13 – mmddyy
Station 14 ⁴	parameter – ST 14 – mmddyy
Station 15 ⁴	parameter – ST 15 – mmddyy
Station 16 ⁴	parameter – ST 16 – mmddyy
Station 17 ⁴	parameter – ST 17 – mmddyy
Station 20	parameter – ST 20 – mmddyy
Station 21	parameter – ST 21 – mmddyy
Station 22	parameter – ST 22 – mmddyy
Field/Trip Blanks	parameter – FBB – mmddyy
Field Duplicates	Append “0” to original sample ID
Cooler Temperature Blank	“Cooler Temperature Blank”
Example Sample Location ID: PAH-ST1-082205	
Example Field Duplicate Pair ID: PAH-ST10-082205/PAH-ST100-082205	
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 until Station 22 is operational 7 – In use from 10/6/05 until deconstruction of 130 Liberty Street completes removal of concrete slab on the 12 th floor	



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 11 will be taken out of service when Station 22 becomes operational. Station 12 will be taken out of service when the deconstruction completes the removal of the concrete slab at the 12th floor.

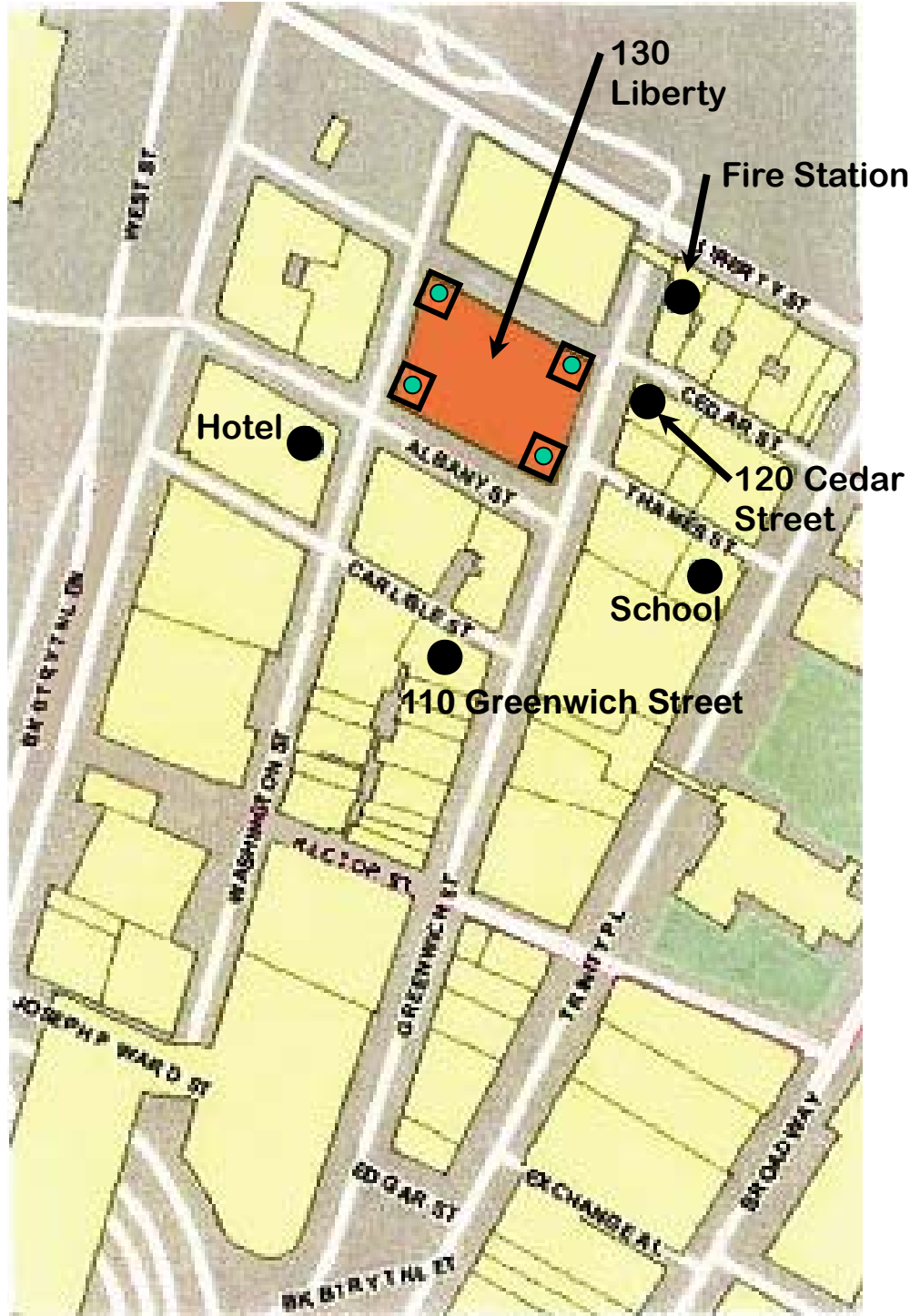
**Site Location Map for
Ambient Air Monitoring Locations
130 Liberty Street
New York, New York**
Updated June, 2010: QAPP Amendment #12

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

**FIGURE
7-1**

Drawn: MAN
Checked: LD
SCALE: AS SHOWN
Date: 6/16/2010

T:\E_CAD\109876\SITE 6-16-10.ppt



Legend:

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

Note: The School station will be taken out of service when the 120 Cedar Street station becomes operational. The 110 Greenwich Street station will be taken out of service when deconstruction completes the removal of the concrete slab at the 12th floor.

Network Schematic-Locations of Off-Site Elevated Roof -Top Stations and "Floating" Stations on Scaffolding

**130 Liberty Street
New York, New York**

Updated June, 2010: QAPP Amendment #12

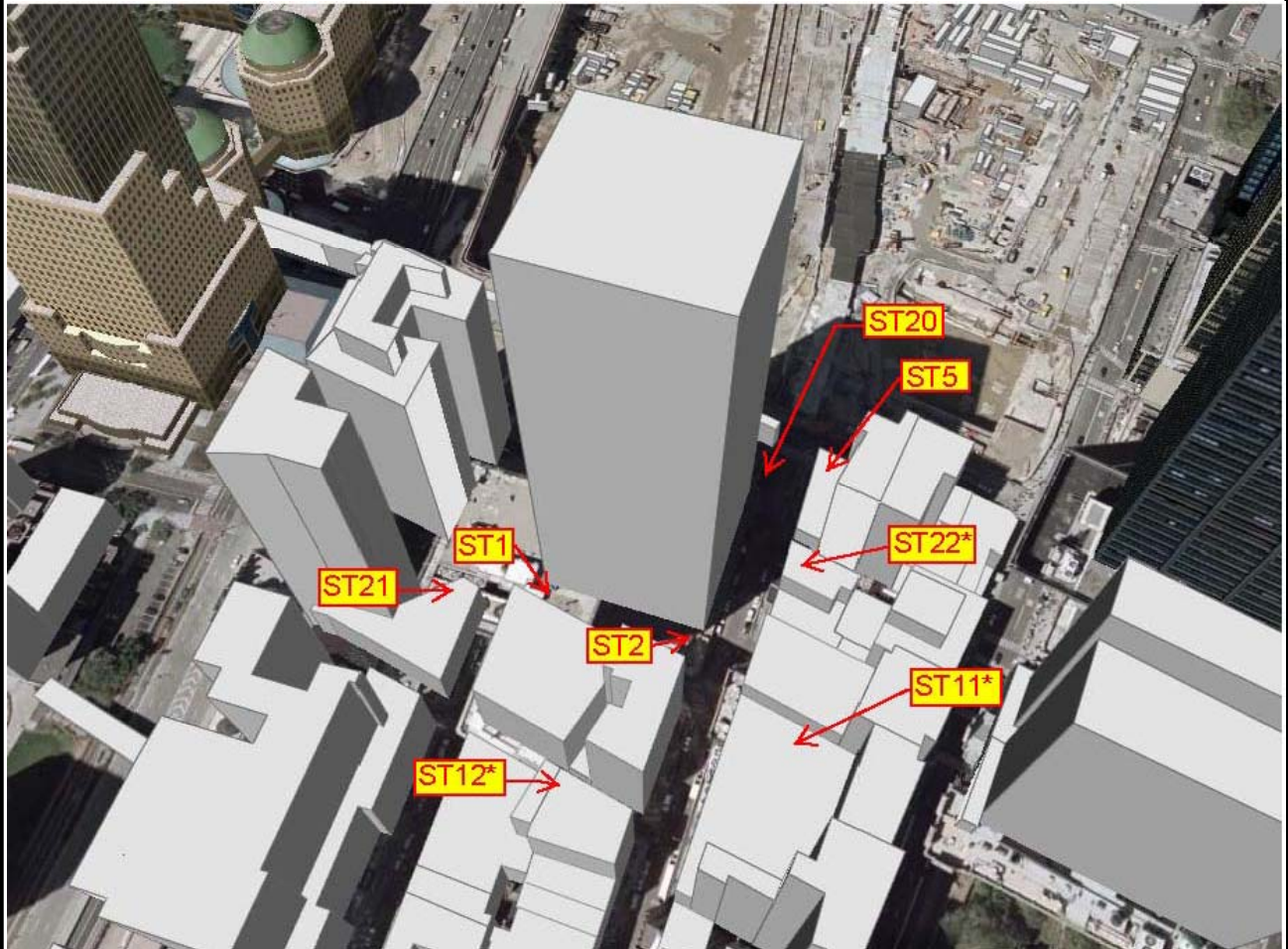


Wannalancit Mills
650 Suffolk Street
Lowell, Ma. 01854
(978) 970-5600

DRAWN: MAN
CHECKED: GH

SCALE: AS SHOWN
Date 6/16/2010

**FIGURE
7-2**



*Station 11 will be taken out of service when Station 22 becomes operational. Station 12 will be taken out of service when the deconstruction completes the removal of the concrete slab at the 12th floor.

**3-Dimensional View of Air Monitoring Stations from The South
130 Liberty Street
New York, New York
Updated June, 2010: QAPP Amendment #12**

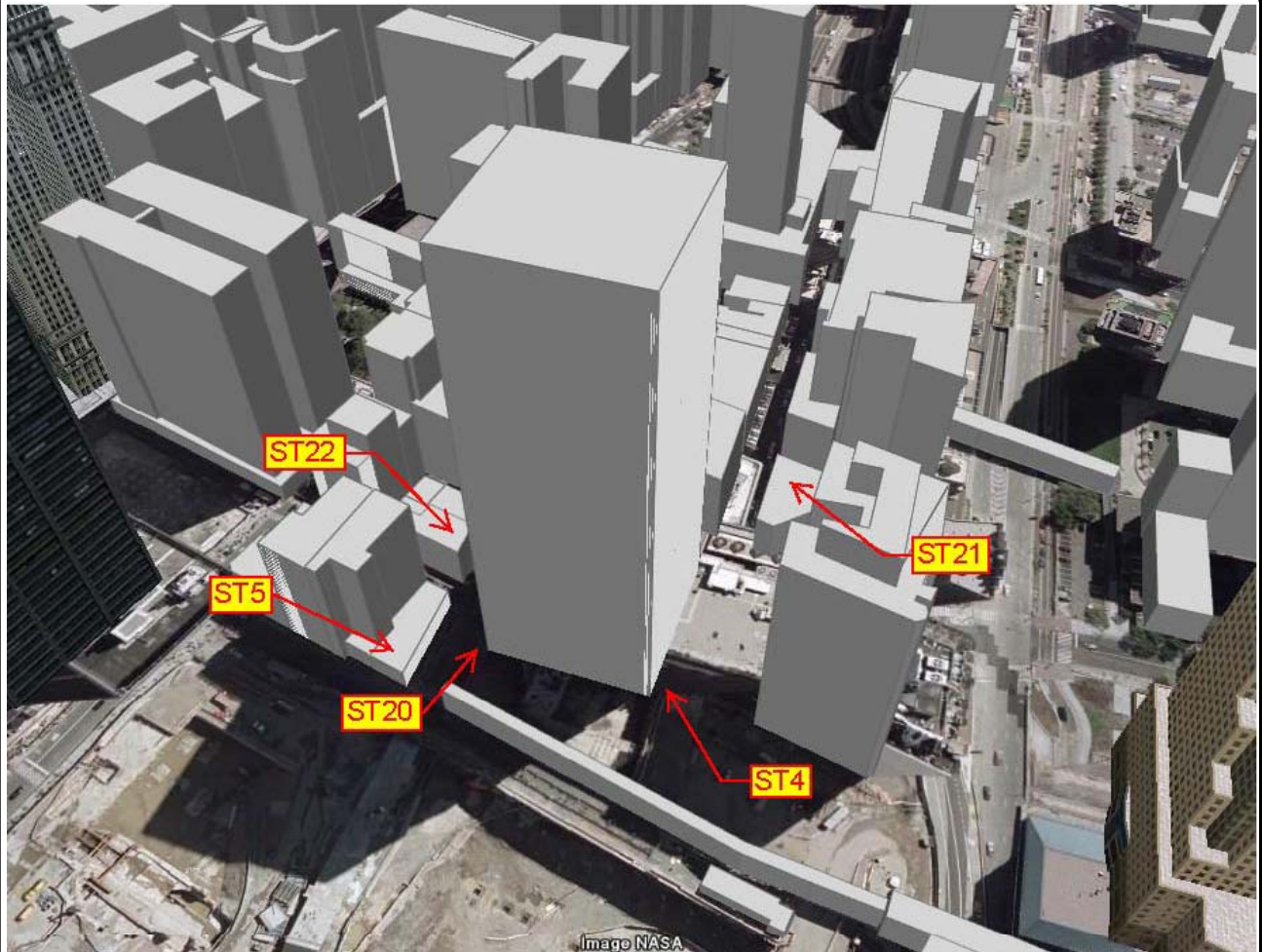


Wannalancit Mills
650 Suffolk Street
Lowell, Ma. 01854
(978) 970-5600

**FIGURE
7-3**

Drawn: MAN
Checked: LD

SCALE: AS SHOWN
Date: 6/16/10



3-Dimensional View of Air Monitoring Stations from the North
130 Liberty Street
New York, New York
Updated June, 2010: QAPP Amendment #12

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

FIGURE
7-4

Drawn: HWB	SCALE: None
Checked: LD	Date: 6/16/2010