

US EPA ARCHIVE DOCUMENT

**SECTION 2 - AMBIENT AIR MONITORING PROGRAM PLAN AMENDMENT FORM**  
**DATE FORM EFFECTIVE: 6/29/06**

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

**AMENDMENT #1**

The stop work procedures currently in place for PM2.5 exceedances will be extended to crystalline silica as well. However, if an assessment determines that an off-site roof top air monitoring location exceedance of a USEPA Site Specific Trigger Level for PM2.5 or silica is associated with 130 Liberty Street, the exceedance will result in a stoppage of work until an evaluation of emission controls is performed and corrective action acceptable to USEPA is in place.

**Reason for Amendment:**

Crystalline silica, like PM2.5, is a common constituent of urban ambient air. The background concentration of crystalline silica in urban areas\* (1-10 ug/m<sup>3</sup>) is within the same order of magnitude of the EPA Site-Specific Trigger Level (10 ug/m<sup>3</sup>) for the 130 Liberty Street deconstruction project. Trigger Level exceedances for PM2.5 and crystalline silica have the potential to result from background variability and such exceedances have been detected by monitors in the vicinity of 130 Liberty. This situation is similar to the situation for PM2.5. Accordingly, the stop work procedures currently in place for PM2.5 exceedances are extended to crystalline silica as well.

\* Hardy T, Weill H. 1995. Crystalline Silica: Risks and Policy. Env Health Perspect, Vol. 103 (2)

**Section of Ambient Air Monitoring Program Plan Affected:**

Section 8.1.2, USEPA Site Specific Trigger Levels: Silica will be added to the following portion of the second paragraph of this section: "Exceedance of USEPA Site Specific Trigger Levels will result in a stoppage of work until an evaluation of emission controls is performed and corrective action is in place. The USEPA Site Specific Trigger Levels are applicable to individual sample results. If any of the individual sample results exceed an USEPA Site Specific Trigger Level, then notification must be made to the USEPA Region 2, NYCDEP and NYSDOL as well as LMDC and LMCCC. Work will be reinitiated once the USEPA Region 2 has agreed (and NYSDOL during the Abatement Phase in the case of asbestos exceedances) to the corrective action(s) proposed to prevent the potential for exceedances in future work and such corrective actions have been implemented. The only exception to the work stoppage requirement will be for an exceedance of the USEPA Site Specific Trigger Level for PM2.5 or silica at one of the off-site roof top locations. If the USEPA Site Specific Trigger Level for PM2.5 or silica is exceeded at an off-site roof top location, regulator notifications as described above shall be made and an assessment, with the active involvement of the USEPA, will be performed to determine if the exceedance was due to an off-site or regional condition unrelated to 130 Liberty Street work. If the assessment determines the exceedance to be associated with 130 Liberty Street, the exceedance will result in a stoppage of work until an evaluation of emission controls is performed and corrective action acceptable to USEPA is in place."

**Date Implemented:**

June 29, 2006

**AMENDMENT #2**

Provide clarity on activities that will not be stopped due to an exceedance of an USEPA Site Specific Trigger Level.

**Reason for Amendment:**

Some activities such as the maintenance of engineering controls are essential during a work stoppage to prevent the occurrence of a situation that may present an imminent and substantial endangerment to public and worker health and the environment.

**Section of Ambient Air Monitoring Program Plan Affected:**

Section 8.1.2, USEPA Site Specific Trigger Levels: The following language will be added as the second to last paragraph for this section: "When work stoppage is required, the following essential and ancillary activities would not be subject to work stoppage: air monitoring, hoist operation, negative air unit operation and maintenance, maintenance of critical barriers, deliveries from off-site, and security."

**Date Implemented:**

June 29, 2006