

US EPA ARCHIVE DOCUMENT

Section 2.0 - Specification for Abatement and Selective Demolition Amendment

Submission Date: October 31, 2007

Title Section 2.0 - Specification for Abatement and Selective Demolition

Amendment #1

Reason for the Amendment

Since the fire at 130 Liberty, which occurred after the final regulation approval of 130 Cedar's plan for "Abatement and Selective Demolition" dated August 8, 2007, the FDNY and DOB have required additional fire safety procedures resulting in the editing of the approved plan. These changes are as follows;

- 1.0 Per the approved plan, hard walled personnel and waste decontamination units per New York City Department of Environmental Protection variance Attachment DI were erected at the east main door access to the 1st floor. The FDNY has required that these units be covered in 2 layers of sheetrock. The sections(s) of the plan affected are;

Section 2.1 – Paragraph #4

- 2.0 Per the approved plan, as yet constructed hard walled barriers were to be constructed from plywood and 2" x 4" wood studs. The FDNY has required that these barriers inside the building be constructed of 2 layers of sheetrock and metal studs. The sections(s) of the plan affected are;

Section 2.1 – Preparatory abatement and containment set-up, Bullet(s) #1 & #14

Section 2.2 – Paragraph #3 – Bullet #2

Section 2.3 – Paragraph #8 – Bullet #4

- 3.0 Per the approved plan, each existing access door to every floor in the main stairwell was to be removed, and a temporary hard barrier with a kick out panel,

foamed and poly sealed as necessary, was to be erected. Additionally, future access to the floors would be accomplished utilizing individual single shower three stage dual personnel and waste decons erected before any abatement activities in each abatement area began. The FDNY has required that these items be replaced with a single airlock constructed of 2 layers of sheetrock from floor to ceiling and attached to the existing walls on each side. All seams of each layer of the sheetrock are staggered and sealed with fire rated caulk. Each wall has a fire-rated metal door installed to enter the airlock from the stairwell and will remain closed at all times during the cleaning process. The sections(s) of the plan affected are;

Section 2.1 – Preparatory abatement and containment set-up, Bullet(s) #6 & #10

Section 2.5 – Paragraph #1

Section 2.8 – Paragraph #1 & #14

Section 2.10 – Paragraph #1 & #7

Section 2.12 – Paragraph #12

- 4.0 An amendment to the NYCDEP approved ACP-7 & 9 was also necessary due to the FDNY & DOB requirements. Additionally, a “Notice of Starting Work” letter to the NYCDEP was necessary because they had issued a “stop work order” in line with the FDNY & DOB requests. These two documents are attached as additions to Appendix K of the approved plan..

Date Implemented:

August 29, 2007

2.11 Appendix K: NYCDEP ACP 7 & 9 Submittals
October 31, 2007 Additions



October 31, 2007

Mr. Rajappan Radhakrishnan, Acting Director

NYC Department of Environmental Protection
Bureau of Air, Noise and Hazardous Materials
Asbestos and Lead Control Program
59-17 Junction Boulevard – 8th Floor
Elmhurst, New York 11373

RE: Notice of Starting Work - Premise Address: 130 Cedar Street – Manhattan
TRU# 1789MN06 VAR# 2692MN06

Mr. Rajappan Radhakrishnan:

Please be advised. We are writing to notify you that we are re-scheduling to begin our work at the above noted premise on Thursday November 1st.

The shift hours are from 7:00 a.m. - 12:00 a.m. (2 shifts) Monday through Friday and 9:00 a.m. - 5:00 p.m. on Saturdays.

Also, attached please find a copy of the DOB stamped approval of the FDNY logistics/interim decontamination enclosure plan and the revised plan for the Work Area Procedures for the Main Stairwell and First Floor per EPA comments.

Furthermore, we will send the approved sprinkler removal drawings upon receipt and will advise on the design and construction on the Phase II permanent decontamination enclosure plan for DOB review and approval.

We hope this letter meets your approval. If you have any questions or comments, please call our office.

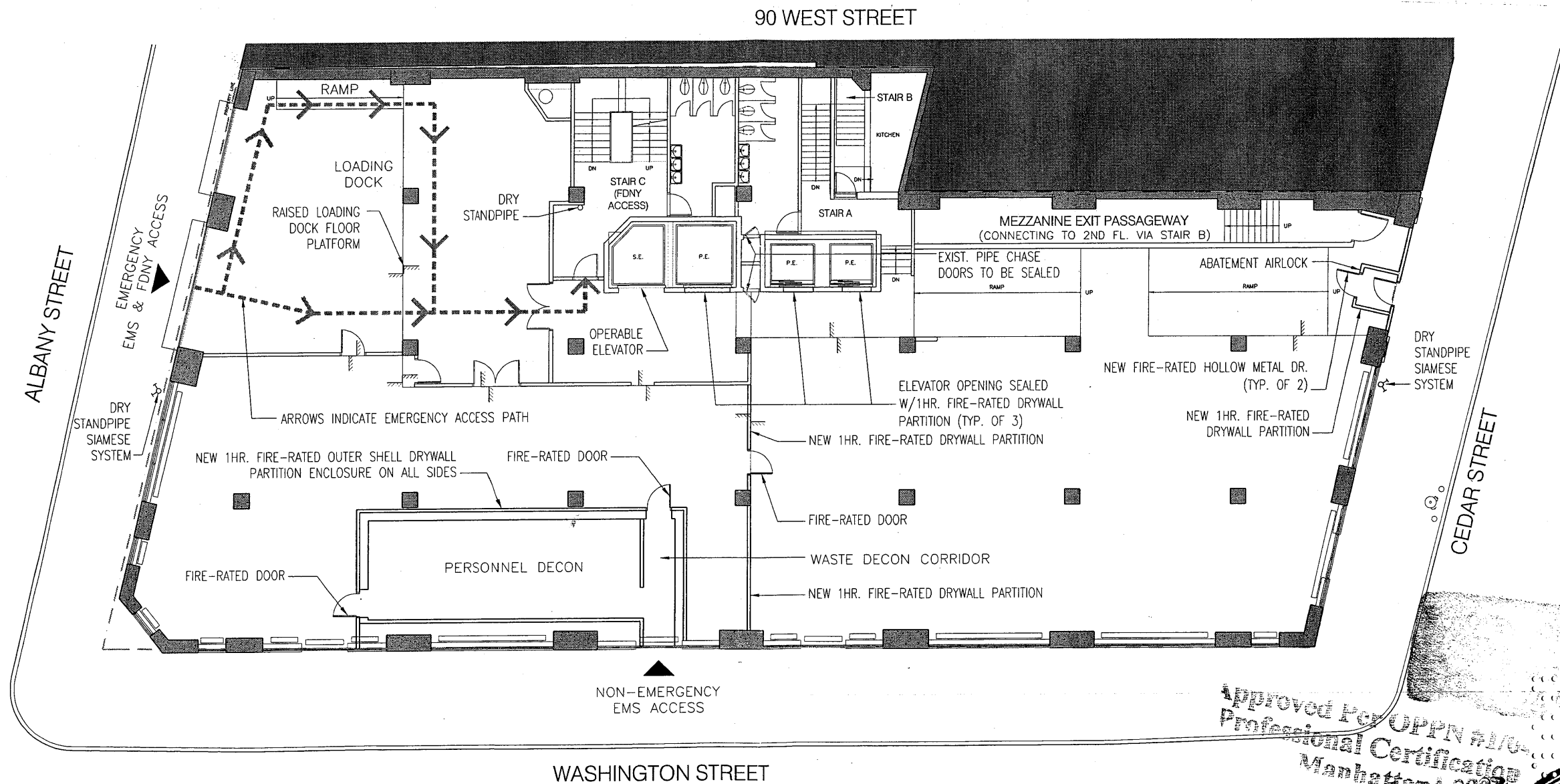
Sincerely,

Christopher Flavell
Nova Development Group, Inc.

104911437



DEPARTMENT OF BUILDINGS



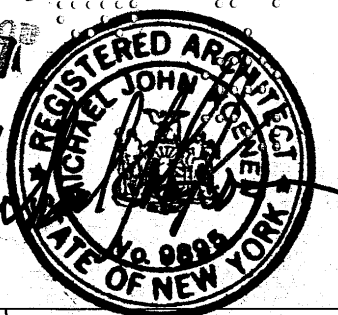
FDNY NOTES:

1. FIRE DEPARTMENT ACCESS THROUGH LOADING DOCK ON ALBANY STREET.
2. STANDPIPE LOCATED IN STAIR C
3. NON-EMERGENCY ACCESS THROUGH WASTE DECON FROM WASHINGTON STREET.

PHASING NOTES:

1. PHASE 1 ABATEMENT SHALL LAST APPROX. 6 WEEKS FROM START OF ABATEMENT.
2. DECON CHAMBERS & CLEAN AREAS TO BE RECONFIGURED IN PHASE 2. A SEPARATE SKETCH SHALL BE SUBMITTED FOR FDNY APPROVAL PRIOR TO COMMENCEMENT OF PHASE 2 ABATEMENT.

Approved For OPPN #10-
Professional Certification
Manhattan
OCT 04 2007



KOENEN ASSOCIATES

Architects and Planning Consultants
6 West 18th Street
New York, New York 10011
ph: 212-206-8333 fax: 212-633-6376

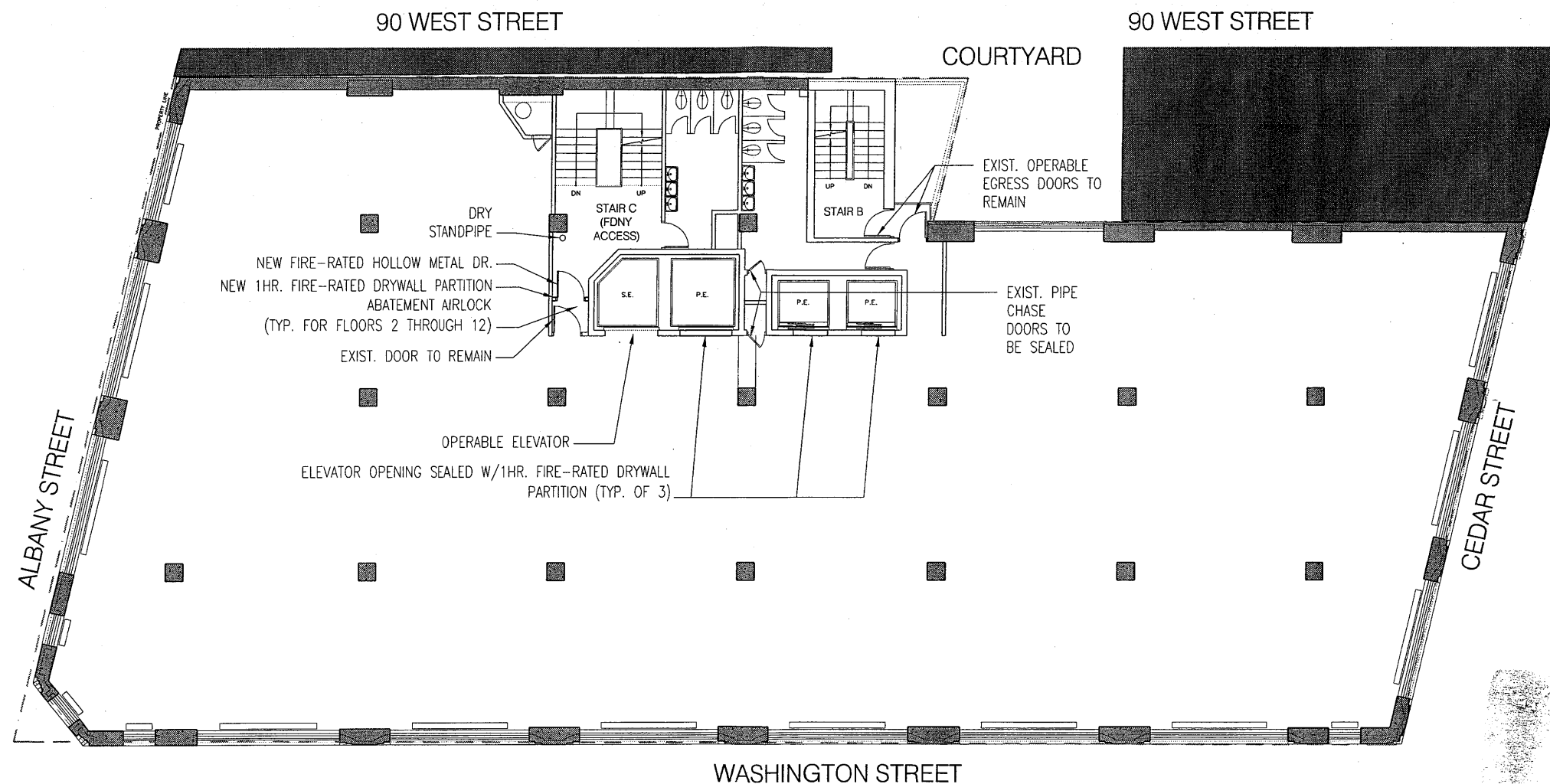
PROJECT:
130 CEDAR STREET HOTEL
BUILDING RENOVATION & ADDITION
130 CEDAR STREET, NEW YORK, NY

SKETCH DESCRIPTION:
FDNY LOGISTICS PLAN
GROUND FLOOR

PROJECT NO.:
354-01

CSK-Z001

DATE: 08.31.2007
SCALE: 1/16"=1'-0"
DRAWN BY: DRG
DWG. REF.:



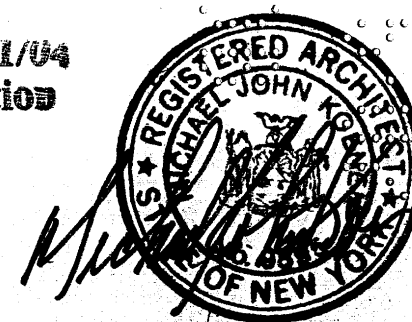
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DEPARTMENT OF BUILDINGS

Professional Certification
Manhattan

OCT 04 2007



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Architects and Planning Consultants
6 West 18th Street
New York, New York 10011
ph: 212-206-8333 fax: 212-633-6376

PROJECT:
130 CEDAR STREET HOTEL
BUILDING RENOVATION & ADDITION
130 CEDAR STREET, NEW YORK, NY

SKETCH DESCRIPTION:
FDNY LOGISTICS PLAN
FLOORS 2 - 12

PROJECT NO.:
354-01

CSK-Z002

DATE: 08.31.2007
SCALE: 1/16"=1'-0"
DRAWN BY: DRG
DWG. REF.:



October 31, 2007

Mr. Rajappan Radhakrishnan, Acting Director

NYC Department of Environmental Protection
Bureau of Air, Noise and Hazardous Materials
Asbestos and Lead Control Program
59-17 Junction Boulevard – 8th Floor
Elmhurst, New York 11373

RE: 130 Cedar Street – Work Area Procedures – Main Stairwell and First Floor.

Dear Mr. Radhakrishnan:

Nova has constructed fire resistant airlock walls in place of a kick out panel on floors 2 through 12 in the main stairwell to gain access to each floor in case of an emergency.

- The airlock wall is constructed of metal studs and 2 layers of sheetrock from floor to ceiling and attached to the existing walls on each side as shown on the attached diagram. All seams of each layer of sheetrock are staggered and sealed with fire rated caulk.
- Each wall has a fire-rated metal door installed to enter the airlock from the stairwell and will remain **closed** at all times during the cleaning process.

Additionally, Nova has installed a fire rated barrier on the exterior (dirty side) of the existing decontamination chamber located on the first floor.

- The fire rated barrier consists of 2 layers of sheetrock. All seams of each layer of sheetrock are staggered and sealed with fire rated caulk. from floor to ceiling and attached to the existing walls on each side as shown on the attached diagram.
- Entry/Exit points on the dirty side of the decon has a fire-rated metal door installed on the exterior (dirty side) as shown on the attached diagram. The doors will remain **open** at all times unless there is a fire emergency in the building.

Cleanup Procedures in the stairwell and 1st Floor in preparation for clearance air monitoring:

- a. Prior to gross clean up on each floor in the stairwell and the first floor the porous sheetrock material will be covered with a surface barrier consisting of 2 sheets of 6-mil polyethylene sheeting and duct tape to protect the barrier from ACM Dust and water penetration.
- b. During gross cleanup all visible accumulations of asbestos containing waste material shall be removed. To pick up excess water and gross debris, a wet-dry HEPA vacuum dedicated to asbestos abatement shall be used.

- c. All containerized waste shall be removed from the work area through the decontamination enclosures and/or holding areas.
 - d. All surfaces in the work area shall then be wet cleaned using rags or mops. After sufficient drying time, HEPA vacuums shall be used to thoroughly clean all surfaces after gross clean up.
 - e. Where porous sheetrock materials have been plasticized for surface barrier containment, the plastic sheeting shall be cleaned as in section (d.) above, then sprayed with an encapsulant and removed when dry.
 - f. Prior to final encapsulation, all porous sheetrock materials shall again be wet wiped and HEPA-vacuumed, removed and disposed of as ACM waste at a minimum, unless otherwise provided in RJLG's Waste Sampling and Management Plan Section 7.0. Encapsulation shall not occur until after the final cleanings and visual inspections by the environmental consultant, EPA, and NYCDEP representatives.
 - g. All surfaces shall then be sprayed with an encapsulant, which upon drying shall not dissolve upon rewetting. Sufficient time for drying shall be allowed.
 - h. All tools and equipment shall be removed from the work area and decontaminated in the decontamination enclosure system.
 - i. After successful clearance air monitoring any isolation barriers shall be removed in conjunction with the use of a HEPA vacuum.
 - j. Airlock walls in the stairwells will be reconstructed/sheetrocked as part of the Phase II containment procedures.
- In Nova's approval for variance dated April 20th, 2007 and specifically PHASE III-B, D, E, F, G, H: Special Condition #7, it was stated that prior to any abatement procedures asbestos workers will construct 3 stage decons in the stairwell landings (floors 2 through 10) leading to the work areas as part of Phase II containment procedures. These decons were to be utilized by the abatement workers and the environmental consultant representatives along with EPA & NYCDEP representatives performing final visual inspections to perform the final cleaning, the final visual inspection and the final air clearances.
 - In place of these 3 stage decons on floors 2 through 10 and in compliance with FDNY's request to construct fire resistant airlocks Nova will re-construct the fire resistant airlocks as previously constructed on floors 2 through 12.

Sincerely,

Christopher Flavell
Nova Development Group, Inc.