

Emergency Action and Community Notification Plan

Remediation and Deconstruction of

**Fiterman Hall
30 West Broadway
New York, New York**

**Dormitory Authority of the State of New York
City University of New York**

October 11, 2006

Project Introduction

On behalf of the City University of New York (CUNY), the Dormitory Authority of the State of New York (DASNY) proposes to remediate and deconstruct Fiterman Hall in Lower Manhattan. The project site is located at 30 West Broadway and includes the city block bound by Park Place, West Broadway, Barclay Street, and Greenwich Street. The 15-story, steel-frame and concrete-slab building was irreparably damaged and infiltrated with contaminants on September 11, 2001, when 7 World Trade Center collapsed and struck the south façade and part of the west façade. The impact led to the partial collapse of the southwest corner of the Fiterman Hall structure. Prior to September 11, 2001, the building was part of CUNY's Borough of Manhattan Community College (BMCC) campus and was used for institutional and educational purposes. The building is currently vacant.

The work proposed by CUNY/DASNY includes: remediation of the interior and exterior of the building; removal and disposal of building contents; deconstruction of the existing 377,000-gross-square-foot structure; and construction of a new 14-story replacement building. All remediation and deconstruction activities will be conducted in accordance with the provisions of the project's Remediation and Deconstruction Work Plan for Fiterman Hall, which has been submitted to the following regulatory agencies (referred to herein as "the Regulators") for review and approval prior to the commencement of work: United States Environmental Protection Agency (USEPA); United States Occupational Safety and Health Administration (OSHA); New York State Department of Environmental Conservation (NYSDEC); New York State Department of Labor (NYSDOL); New York City Department of Environmental Protection (NYCDEP); and New York City Department of Buildings (NYCDOB). The Remediation and Deconstruction Work Plan was submitted to the Regulators on January 10, 2006, and included the *Regulatory Submittal Part II—Environmental Community Air Monitoring Program* and the *Regulatory Submittal Part III—Health & Safety Plan*. Comments on these documents were provided by the Regulators on April 7, 2006. As of the date of this document, CUNY/DASNY and its contractors are revising the Remediation and Deconstruction Work Plan in accordance with these comments. The proposed remediation and deconstruction is also undergoing environmental review under the New York State Environmental Quality Review Act (SEQRA).

Purpose of Emergency Action and Community Notification Plan

This Emergency Action and Community Notification Plan has been prepared at the request of community leaders. Its purpose is to provide an overview of the procedures to be followed and the parties to be involved in responding to emergencies that could occur during the remediation and deconstruction of Fiterman Hall. Detailed procedures to be followed in the event of certain types of emergencies are provided in the *Regulatory Submittal Part II—Environmental Community Air Monitoring Program* and the *Regulatory Submittal Part III—Health & Safety Plan*. The *Regulatory Submittal Part II—Environmental Community Air Monitoring Program* and the *Regulatory Submittal Part III—Health & Safety Plan* have not yet received final USEPA approval; however,

draft versions are available on USEPA's website (http://www.epa.gov/wtc/demolish_deconstruct/30wbroadway.htm). The Regulators' comments are also provided on the website. The *Regulatory Submittal Part II—Environmental Community Air Monitoring Program* addresses the air monitoring to be performed for the project and reflects notification protocols required by the regulatory agencies. The *Regulatory Submittal Part III—Health & Safety Plan* addresses on-site worker safety. This Emergency Action and Community Notification Plan references those documents where appropriate for detailed emergency action procedures, and may require modification upon finalization of the regulatory submittals.

Roles and Responsibilities

Contractor (PAL Environmental Safety Corp.): The Contractor has overall responsibility for the execution of this plan. While the Contractor will be required to identify specific personnel to fulfill the roles required by this plan, the designation of individuals to fulfill the roles specified in this plan does not relieve the Contractor from overall responsibility to ensure that the designated individuals are both qualified and actively fulfilling the specified roles.

Contractor Emergency Coordinator: The Contractor will designate a Contractor Emergency Coordinator (CEC), who is licensed as a New York City Site Safety Manager (NYCSSM) and has sufficient experience to properly execute the duties detailed herein. This individual will have overall responsibility for the implementation, coordination, and execution of this plan. The CEC may be the same individual that fulfills the role of Contractor Safety Officer (CSO) specified in the *Regulatory Submittal Part III—Health & Safety Plan*. The CEC will liaise with first responders prior to the start of the work of the project for pre-planning coordination, and will remain the primary point of communication of emergency information off the site. The CEC or a fully qualified designee will be on site at all times work is proceeding. The CEC will be responsible to orient CEC designees and Subcontractor Emergency Coordinators (described below).

CEC Designee: Any individual designated to fill the role of the CEC must meet all of the experience and licensure requirements for that role. In addition, any designee must have participated in the pre-planning activities, or have undergone sufficient project-specific site orientation to allow them to fully understand site requirements and communication pathways.

Subcontractor Emergency Coordinator(s): Each subcontractor conducting work at the site will designate an emergency coordinator to communicate directly with the CEC and assist in the coordination of emergency response actions by subcontractor personnel.

On-Site Personnel: All contractor and subcontractor personnel assigned to the site will undergo orientation in this plan and the *Regulatory Submittal Part III—Health*

and Safety Plan, so that each individual is able to understand and participate in the execution of the response actions.

Environmental Consultant (Airtek Environmental Corp.): The environmental consultant will designate an on-site Project Manager (ECPM) to act as a liaison to the CEC and assist in the pre-planning and coordination of environmental control aspects of the project. The ECPM, in cooperation with the Regulators, will have the responsibility of evaluating environmental control response actions, and determining whether further action is required. Where environmental control response actions are determined to be insufficient, the ECPM will communicate with the Regulators and endeavor to determine the nature and extent of further remedial response actions required to mitigate the situation. The ECPM will have the authority to establish whatever additional monitoring and testing measures are required to assess the environmental impact of an emergency, and to communicate response actions and data to the Regulators.

First Responders: In the event of an incident requiring emergency response, the CEC (or other designated person) contacts the first response agencies, typically by calling 911. First response agencies include the New York City Fire Department (FDNY), New York City Police Department (NYPD), and the Office of Emergency Management (OEM). The first responders are the primary decision makers regarding emergency actions to be taken, immediate public notification and/or evacuation, and other incident command actions. Response actions will then be coordinated with the New York City Department of Buildings (NYCDOB), Department of Health and Mental Hygiene (DOHMH), New York State Department of Labor (NYSDEL), and New York City Department of Environmental Protection (NYCDEP) as warranted.

BMCC Community Emergency Response Team (CERT): The New York City Community Emergency Response Team (CERT) program trains community volunteers to assist agencies and emergency personnel in dealing with local disasters. CERTs can also assist in educating their communities about preparing for emergencies. BMCC has its own CERT. The BMCC CERT will be the designated CERT for the Fiterman Hall project. Depending upon the nature of the emergency, the BMCC CERT leader may be contacted to help manage the situation.

Owner – CUNY/DASNY: As project sponsors, CUNY/DASNY representative(s) will be designated to be the point of contact for the CEC in the event of an emergency. CUNY/DASNY will be involved in updating the community about the progress of work at Fiterman Hall and notification of recent events.

LMCCC: As the entity responsible for coordinating construction-related activities in Lower Manhattan, CUNY/DASNY and its representatives will coordinate regularly with the Lower Manhattan Construction Command Center (LMCCC).

Regulators: As soon as is practical given the nature of the emergency, notification will be made by the CUNY/DASNY representative to the Regulators. As stated above, the Fiterman Hall regulator list includes USEPA, OSHA, NYSDEC,

NYSDOL, NYCDEP, and NYCDOB. Where appropriate, site specific information will be relayed directly from the project team to the Regulators requiring detailed information (for example, Airtek may directly relay site monitoring data to USEPA, NYCDEP and NYSDOL).

Emergency Events

The *Regulatory Submittal Part III–Health & Safety Plan* describes the procedures to be followed in the event of several types of emergencies, such as a power outage or structural failure. The *Regulatory Submittal Part III–Health & Safety Plan* also describes the step-by-step procedure for building evacuation in the event of an emergency and the designated assembly area. The *Regulatory Submittal Part II–Environmental Community Air Monitoring Plan* describes the air monitoring and visual observations to be conducted during the remediation and deconstruction of Fiterman Hall to detect fugitive dust and/or contaminants so that response actions can be implemented and immediate regulatory notifications can be made.

Below is a general sequence of emergency communications at the Fiterman Hall site for emergency events not specifically described in the aforementioned regulatory submittals:

Reporter of Emergency:	911 Contractor Emergency Coordinator
Contractor Emergency Coordinator:	911 (for clarifications/response coordination) Subcontractor Emergency Coordinator(s) Environmental Consultant Project Manager DASNY/CUNY Representative
DASNY/CUNY Representative:	LMCCC Regulators BMCC CERT

Depending upon the nature of the emergency, the communication sequence may change. The *Regulatory Submittal Part III–Health & Safety Plan* contains an emergency contact telephone list.

Community Notification Mechanisms

FIRST RESPONDER NOTIFICATION

For all emergency events that originate on the site, the Contractor Emergency Coordinator (or other on-site person) will call 911. In these situations, the first responders—including FDNY, NYPD, and OEM—will be the primary decision makers. The first responders will determine and implement the necessary immediate response. CUNY/DASNY and the Contractor Emergency Coordinator will defer to and support the first responders regarding the appropriate measures to be taken. CUNY/DASNY will not

separately notify the public during these emergencies, so as not to interfere with the communication protocols established by the first responders. As described above, the Contractor Emergency Coordinator will then contact each Subcontractor Emergency Coordinator, the ECPM (for consultation on hazardous materials and/or air quality emissions concerns), and the designated CUNY/DASNY emergency points of contact. Depending on the nature, location, and magnitude of the emergency, the BMCC CERT may be contacted to assist in managing the emergency.

AFTER AN INCIDENT

CUNY/DASNY will maintain contact information for individuals to be notified after an incident has occurred. Such individuals will likely include elected local officials, Community Board members, and LMCCC. CUNY/DASNY will contact these individuals to describe the event and, if applicable, explain measures taken to remedy or mitigate the situation. If warranted, other follow-up communications, such as a newsletter or a Community Board meeting, may occur.

General information about the Fiterman Hall project is currently available on the “lowermanhattan.info” website—<http://www.lowermanhattan.info/construction>. This website will contain ongoing general project updates as work at Fiterman Hall progresses. The website may also be used to post information on certain emergency and noticeable non-emergency incidents, as well as to describe the responsive measures taken. An example of a non-emergency event that may warrant community notification (through the website or other means) is a false fire alarm, which may be audible to nearby residents but does not pose any danger. The lowermanhattan.info website will be updated regularly to indicate upcoming community meetings or other project-related information. BMCC has its own website (<http://www.bmcc.cuny.edu>), which also contains information about Fiterman Hall and will continue to be updated as the project proceeds.