



PAL ENVIRONMENTAL SAFETY CORP.
Environmental Contracting Specialists

Date: May 10, 2007

Mr. Christopher G. Alonge, P.E.
Associate Safety and Health Engineer
New York State Department of Labor
W. Averell Harriman State Office Campus, Bldg. 12, Room 154
Albany, NY 12240

APPROVED

MAY 11 2007 *C. Alonge*

New York State Dept. of Labor
Engineering Services Unit *g-10/2*

Re: Request to Re-Open
Variance No. 06-0852
Fiterman Hall - 30 West Broadway, New York, NY

Dear Mr. Alonge:

In order to supplement the Pilot Program operations during the Scaffold Erection Operation (SEO), PAL requests approval to utilize the procedure outlined below. This procedure is designed to allow for Pilot Program air sampling to be focused to detect for the presence of ACM fibers without being overloaded by debris from exterior brick and mortar, material known and documented in previous Pilot Program operations to be non-asbestos containing or impacted.

Supplemental Pilot Program Procedures

- Supplemental pilot program procedures will be performed in existing tent enclosures on the east and west sides of the Building by NYC DEP and NYS DOL licensed asbestos handlers utilizing proper PPE.
- The removal of a section of brick and mortar will be performed from inside each tent enclosure to expose the spandrel beam locations that are affected by asbestos material. Brick and mortar will be removed utilizing mechanical chipping hammers or manual hammers and chisels. During brick and mortar removal, negative pressure equipment will not be operated and air sampling will not be conducted inside the tent enclosures.
- Upon completion of the brick and mortar removal, the Owner's Environmental Consultant will perform a visual inspection of the opening to determine if any suspect dust or debris is present within the opening. Should dust or debris be found in either supplemental Pilot Program location, the protocol outlined in Variance No. 06-0852 will be implemented. If no dust or debris is detected, the Supplemental Pilot Program will proceed.
- Upon the completion of brick and mortar removal PAL workers will clean the interior of the tent enclosures by HEPA vacuuming and wet wiping.
- After cleaning of the tent enclosures is completed a critical barrier will be installed over each opening to allow the Owner's Environmental Consultant to perform TEM background air sampling within the tent enclosures. No further work will be performed within these tent enclosures until sampling results are received.
- After background sampling results are received, the removal of asbestos mastic from the spandrel beam will proceed within each tent enclosure. Negative pressure will not be established during the removal of mastic from the spandrel since the purpose of the Supplemental Pilot Program is to determine if mastic removal operations will release

BACKGROUND AIR SAMPLING NOT REQUIRED
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asbestos fibers into the surrounding environment. The Owner's Environmental Consultant will conduct during abatement TEM air sampling inside and outside of each tent enclosure (two samples in, two samples out per enclosure). Asbestos mastic material will be wetted down with amended water via pump sprayers prior to removal. Once the mastic has been sufficiently wetted down, NYC DEP and NYS DOL licensed asbestos handlers will then utilize manual scraping tools to remove a plus or minus eight inch by eight inch (+/- 8" x 8") spot of mastic from the spandrel beam.

- Following the removal of mastic, the exposed steel surface of the spandrel beam will be cleaned by HEPA vacuuming and wet wiping.
- Upon completion of the abatement and cleaning, and once sufficient volume of air has been collected, the TEM air sampling runs will be terminated. The samples will then be sent to the laboratory for analysis. If sample results are above seventy structures per millimeter squared (70 s/mm^2), the tents will be re-cleaned and a new set of TEM samples will be run again until successful clearance is met.
- The cleaned steel spandrel surface will then be encapsulated.
- Tents will only be broken down if all sample results are less than 70 s/mm^2 .

Should TEM results indicate that mastic removal operations did not generate asbestos contamination, then PAL will proceed with the removal at all tie-in locations for the entire Building without tent enclosures.

If you have any questions or require further information regarding this procedure, please contact our office.

Sincerely,
PAL Environmental Safety Corp.



Aric Domozich
Compliance Manager
NYS Project Designer (Certification No. 07-02183)

APPROVED

MAY 11 2007 *C. Long*

New York State Dept. of Labor
Engineering Services Unit *g. 2/12*