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September 11, 2007

David Emil  
President  
Lower Manhattan Development Corporation  
One Liberty Plaza, 20<sup>th</sup> Floor  
New York, NY 10006

**RE: Recent Dioxin Results Clarification Information**

Dear David:

I am writing to address recent reports about the results of certain air monitoring tests at 130 Liberty Street that detected the presence of dioxin. These reports failed to adequately explain the test results and could have misled or alarmed members of the Lower Manhattan community. As LMDC's air monitoring consultant, we believe it is important to clarify any misrepresentations of the data and to provide the appropriate information to the public.

Using the methods and technology employed on this project, dioxin is typically detected at certain background levels in the air in New York City, as it would be in many other urban environments. Since the inception of the project until before the fire, typical background concentrations have been found to be on average approximately 0.04 picograms of dioxin (expressed as TEQ) per cubic meter of air ( $\text{pg}/\text{m}^3$ ). The United States Environmental Protection Agency has set project specific target and trigger levels for dioxin for 130 Liberty Street. Results exceeding the target level (expressed as a rolling average) are cause for notification to the EPA, while those exceeding trigger levels result in work stoppage and require corrective action. For the 130 Liberty Street deconstruction project, the EPA has set these levels at  $0.25 \text{ pg}/\text{m}^3$  and  $25 \text{ pg}/\text{m}^3$ , respectively.

On August 27<sup>th</sup> and 28<sup>th</sup>, air monitoring results generated by monitors on the 15<sup>th</sup> floor scaffolding on the northwest corner of the building detected dioxin at levels of  $0.123 \text{ pg}/\text{m}^3$  and  $0.183 \text{ pg}/\text{m}^3$  – levels that are well below the EPA-established target and trigger levels. Note these levels were incorrectly reported in a Daily News article today in units of nanograms per cubic meter, or 1000 times higher than picograms per cubic meter of air. Moreover, that slightly elevated levels of dioxin were detected on those days was not surprising since dioxin is an expected byproduct of combustion, such as a fire, as was the case at 130 Liberty.

The above-mentioned air monitoring results were reported by TRC Environmental Corporation (TRC) at the August 31<sup>st</sup> OEM meeting at which all of the City, State and Federal regulators were present. None of the regulators requested additional air sample analysis in

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response to these results, as they were below project specific target levels. Nonetheless, at LMDC's request, TRC has analyzed additional air samples collected for organic materials, including dioxin. All of the subsequent test results for dioxin to date are also well below the EPA-established target and trigger levels.

Sincerely yours,  
**TRC ENVIRONMENTAL CORPORATION**



Edward Gerdts  
Vice President

Cc: Thomas Kunkel, LMCCC  
Gary Hunt, TRC