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## **Asbestos Dust Mitigation Plan Guidelines**

### **General Guidelines on the Preparation of an Asbestos Dust Mitigation Plan for Submittal to the Northern Sierra Air Quality Management District**

The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations (Title 17 of the California Code of Regulations ((CCR)), §93105) contains specific requirements for the preparation of an Asbestos Dust Mitigation Plan (ADMP).

An ADMP is required for any project with *greater than one acre* of surface disturbance *if* any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock (and an exemption has not been granted pursuant to a “geologic evaluation” performed in accordance with the ATCM) *or* if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined by the owner/operator or the Air Pollution Control Officer (APCO).

The ADMP must be submitted to and approved by the District before any clearing, grading or construction begins and the provisions of the ADMP must be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project.

Please allow at least ten working days for the District to review the ADMP and write a letter of conditional or full approval to the appropriate agency or person.

The ADMP must specify dust mitigation practices which are sufficient to ensure that *no equipment or operation emits dust that is visible crossing the property line.*

Note that if any ultramafic material is being used in surfacing applications onsite or transported offsite, the Asbestos ATCM for Surfacing Applications (CCR Title 17, §93106) should be consulted for applicability. Surfacing includes using the material for landscaping, trails, driveways, parking areas, erosion control, soil stabilization or roads, among other uses. If any material containing 1% or more friable asbestos (technically, this is considered “hazardous material”) is to be transported, CCR Title 22 applies, and proper handling procedures, such as wetting and covering the material, must be followed.

Also note that under regulations of the California Department of Real Estate, the presence of environmental hazards, including asbestos, must be disclosed by a property seller during the real estate transaction process.

Beginning on the following page is a template for an approvable ADMP. This is provided as a general support document only, and does not reflect all provisions of the ATCM. Additional options exist in the actual ATCM for some of the following conditions, but this is basically what the District considers adequate for achieving compliance with the ATCM. If deviating from this sample in the preparation of a Plan, please clearly indicate to the District where alternative measures are proposed or where items are omitted, in order to expedite the District’s review of the Plan.

## ASBESTOS DUST MITIGATION PLAN – TEMPLATE

### Conditions

- 1) Provisions of this Asbestos Dust Mitigation Plan shall apply throughout grading and construction activities except as specified otherwise.
- 2) All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA filter equipped vacuum device. Reference: (e)(4)(A)1 of the ATCM.
- 3) A gravel pad designed and maintained to effectively clean tires of exiting vehicles, a wheel wash system, or a minimum of fifty (50) feet of pavement must be placed between the construction area and any public road, and must be utilized by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project. Reference: (e)(4)(A)2 of the ATCM.
- 4) All active storage piles shall be adequately wetted or covered with plastic to ensure that no visible dust crosses the property boundary. Reference: (e)(4)(B) of the ATCM.
- 5) Potential dust emissions from disturbed surface areas and storage piles that will remain inactive for more than seven (7) days shall be controlled to completely prevent visible dust from crossing the property boundary by at least one of the following methods (per (e)(4)(C) of the ATCM):
  - A. Keeping the surface adequately wetted;
  - B. Applying chemical dust suppressants or chemical stabilizers according to the manufacturer's recommendations and all applicable regulations;
  - C. Covering with tarp(s) or vegetative cover;
  - D. Installing wind barriers of fifty (50) percent porosity around three (3) sides of all storage piles;
  - E. Installing wind barriers across open areas and between the project and any adjacent occupied residential or business property.
- 6) The maximum vehicle speed on all unpaved parts of the project area must be clearly posted and must not exceed fifteen (15) miles per hour. Reference: (e)(4)(D)1 of the ATCM.
- 7) All areas where vehicles drive on the site shall be watered every two hours or kept adequately wetted to prevent visible dust emissions from leaving the property boundary, except where a gravel cover has been established that has a silt content of less than 5% and an asbestos content of less than 0.25% and is at least 3 inches thick. Reference: (e)(4)(D)2 of the ATCM.
- 8) For all earthmoving activities, at least one of the following methods of dust control shall be implemented, per(e)(4)(E) of the ATCM:
  - A. Pre-wetting the ground to the depth of anticipated cuts;
  - B. Suspending grading operations when visible dust emissions from any aspect of the grading (including tires, fans and exhaust) cross the property line.
- 9) Trucks used for hauling material off-site shall be maintained such that no spillage can occur from holes or other openings. Reference: (e)(4)(F)1 of the ATCM.
- 10) All loads to be hauled off-site shall be adequately wetted to prevent visible dust from escaping during transportation, per (e)(4)(F)2 of the ATCM, and shall either:
  - A. Be completely covered with tarps; or
  - B. Have at least six (6) inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.
- 11) Upon completion of the project, disturbed surface areas shall be stabilized, per (e)(4)(G) of the ATCM, using one or more of the following methods:
  - A. Establishment of a vegetative cover;
  - B. Placement of at least three (3) inches of material having an asbestos content of 0.25% asbestos or less as measured using an approved asbestos bulk test method; or
  - C. Paving.

- 12) The District's APCO may require bulk sampling at any time. If bulk sampling is required, it shall be performed in accordance with ARB Test Method 435. Where the Method specifies "serpentine," this shall apply to gravel, decomposed ultramafic rock or any other material as specified by the APCO.
- 13) The District's APCO may require air monitoring at any time, and may modify this Plan on the basis of results of the monitoring. If monitoring is required, it shall be done in accordance with the following provisions:
  - A. The type of air sampling device(s) shall be: [Please specify]
  - B. The operating locations of the sampling devices specified above shall include at least one device at the upwind edge of the site and one device at the downwind edge of the site. Sampler operating locations are described as follows [Please specify]
  - C. The sampling period shall be no less than [Please specify] continuous hours.
  - D. The sampling frequency shall be at least once per calendar week unless no grading or clearing is being performed during that week.
  - E. If any grading or clearing is being performed during a calendar week, then sampling shall be performed while the grading or clearing is occurring, unless 0.1 inch or more of rain has fallen within the previous 24 hours.
  - F. Sampling results shall be analyzed according to the method(s) prescribed by the United States Environmental Protection Agency, Asbestos Hazard Emergency Response Act (AHERA) criteria located in 40 CFR, Part 763, subpart E, Appendix A, with the following exceptions: The analytical sensitivity shall be 0.001 structures per cubic centimeter (0.001 s/cc); and all asbestos structures with an aspect ratio greater than three to one (3:1) shall be counted, irrespective of length.
  - G. Results of all monitoring or sampling performed pursuant to this plan shall be submitted to the APCO as soon as is reasonably possible, and not later than one week following the sampling.
  - H. Results of all monitoring or sampling performed pursuant to this plan shall be retained by the owner/operator for at least seven (7) years following the completion of the project, and shall be made available to the APCO upon request.
- 14) Before site disturbance (e.g. clearing, grubbing or grading) begins, the District shall be informed by telephone at (530) 274-9360 of the exact day on which site disturbance will commence.