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COUNTY OF MENDOCINO
AIR QUALITY MANAGEMENT DISTRICT
UKIAH, CALIFORNIA 95482

April 24, 2002

Ray Hall, Director
County of Mendocino
Planning and Building Services Department
501 Low Gap Road
Ukiah, CA 95482

Subject: Mendocino County Air Quality Management District policies for areas containing Naturally Occurring Asbestos (NOA).

Director Hall:

The new Airborne Toxic Control Measure (ATCM) for Naturally Occurring Asbestos (NOA) and Surfacing Applications established by the California Air Resources Board went into effect November 13th 2001 [CCR Section 93106]. The new ATCM for NOA and Construction, Grading, Quarrying, and Surface Mining Applications has been passed by the California Air Resources Board and is now in final comment period [Section 93105]. The District is required by law to enforce all ATCMs adopted by the Air Resources Board (ARB) or adopt its own more stringent Regulation. Based on these two NOA related ATCMs, the District has developed the following policies in dealing with development proposals in areas containing NOA:

The District will use either California Bureau of Mines and Geology geologic survey maps, or a Mendocino Soils Survey GIS map prepared by Information Services to identify areas likely to have potentially asbestos containing geologic features. For projects in areas identified as potentially containing NOA, the District will now require a report by a State registered geologist using ARB Test Method 435 to determine that NOA levels are below levels of regulatory concern (proposed CCR Section 93105 (c)(1)).

If the State registered geologist determines that NOA is not present, or present in levels below regulatory concern, the District believes the project should continue with no special NOA conditions.

If a State registered geologist determines that NOA is present at levels above regulatory concern, or the applicant chooses not to have testing done, the District will require the following mitigation measures (CCR 93105(d) & (e)):

- Construction within ¼ mile of a school, hospital or other location with individuals especially sensitive to air pollution can only occur with a District permit.
- All onsite workers are notified of the presence or possible presence of NOA per OSHA requirements.
- For road construction and maintenance [CCR §93105(d)]:
 - Notification to the District at least 14 days in advance of commencing work.
 - Dust control measures to prevent visible emissions.
 - Unpaved areas subject to vehicle traffic kept adequately wetted.
 - Speed of vehicles on unpaved areas less than 15 mph.
 - Use of track-out prevention devices.
- For construction and grading operations of less than one acre [CCR §93105(e)(1)]:
 - Speed of vehicles on unpaved areas held to less than 15 mph.
 - Dust control measures (wetting) to prevent visible emissions.
 - Washing construction vehicles before moving off property
 - Cleaning of visible track-out onto paved roads as needed but no less than every 24 hours.
- For construction and grading operations of one acre or more [CCR §93105(e)(2)]:
 - In addition to the above, submittal of an Asbestos Dust Mitigation Plan meeting the requirements of CCR §93105(e)(4).
 - After construction stabilize uncovered areas [CCR §93105(e)(4)(G)].
 - Keep records of, and report to District all geologic survey, and sampling and analysis results [CCR §93105(e)(5)].
- All fill removed from areas containing NOA are disposed of in accordance with the applicable laws.
- District approved dust suppressants be used on all unpaved surfaces annually.

Additionally the District strongly recommends the following conditions:

- All unpaved road surfaces in NOA containing areas be paved, including driveways (will eliminate dust suppressant condition above).
- Additional traffic generated by the development must not result in significant or significant unmitigated (if mitigation is possible), increases in NOA from any unpaved roads leading to the site.

There are specific details associated with implementing various parts of the above list of requirements. Those we can work out with the individual developers. It would be most

appropriate and appreciated if the Planning and Building Department would ensure that people requesting permits to put in roads and do construction grading work contact us to find out about air quality requirements and details. Please note that there are also restrictions on quarrying and mining operations in these ATCMs. However, they should be covered under our permit requirements *as long as operators know they need a permit* from the District.

Please contact the District at (707) 463-4354 with any questions.

Sincerely,

C. D. Wolbach, Ph.D.
Air Pollution Control Officer

cc: CAO (Mordhorst)
DOT (Calvert)
File
Policy file