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MENDOCINO COUNTY AIR QUALITY MANAGEMENT DISTRICT

NOA Testing and Evaluation Guidance Document (9/13/10)

The Mendocino County Air Quality Management District (MCAQMD) periodically requires that all subject permit holders demonstrate compliance with the State Air Toxic Control Measures for Naturally Occurring Asbestos (NOA) through either:

- 1.) Sampling and testing, or
- 2.) A geologic evaluation for Naturally Occurring Asbestos.

The MCAQMD requires that all sampling and testing and geologic evaluations be performed under the responsible charge of a licensed California Professional Geologist and follow the requirements of the applicable Naturally Occurring Asbestos Air Toxic Control Measures (ATCM) (17CCR§ 93105, 17CCR§93106), and ARB Test Method 435 (17CCR§94147). Information on Naturally Occurring Asbestos ATCMs is online at http://www.arb.ca.gov/toxics/asbestos/reginfo.htm.

To find a Registered Geologist please visit http://www.geology.ca.gov/.

Sampling and Testing Requirements

For periodic sampling and testing, ARB Test Method 435 states, that "a sampling plan, including a description of how the grab samples will be randomly collected and the number of samples to be collected, shall be developed." The sampling frequency required for determining the asbestos content of aggregate material shall be no less than one random three-point composite sample for each 1,000 tons of aggregate for piles or conveyor belts, for each acre of aggregate covered surface, for each mile of aggregate covered road, or for each two acres or two miles of dual aggregate covered shoulders. A minimum of three samples shall be collected. Additional information on ARB Test Method 435 is online at www.arb.ca.gov/testmeth/vol3/M_435.pdf. In addition to Test Method 435 requirements, MCAQMD requires all sampling to accurately represent site conditions.

A brief sampling letter report signed and stamped by the Professional Geologist should be submitted to the District for review and approval. This report must include the following information:

- 1.) The sampling plan, procedures and log;
- 2.) Analytical procedures;
- 3.) Conclusions and recommendations; and
- 4.) All laboratory reports.

Geologic Evaluation

An alternate compliance option is to have a geologic evaluation of the extraction site for NOA prepared by a licensed Professional Geologist that concludes that no serpentine or ultramafic rock is likely to be found in the area to be disturbed. This report must be submitted to the District for review and concurrence. For this compliance option, the detailed "Guidelines for Geologic Investigations of Naturally Occurring Asbestos in California", Special Publication No. 124 of the California Geological Survey, is additionally recommended. This publication is online at:

 $\underline{www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/Documents/Asbestos_Guidelines_SP124.}\\ \underline{pdf}$