



This Advisory is provided to inform you about activities of the District which your staff may receive questions. It is intended to assist you in your effort to assist applicants regarding compliance with applicable air pollution rules and ATCMs.

ATTENTION: BUILDING AND PLANNING DEPARTMENTS

SUBJECT: ASBESTOS AIRBORNE TOXIC CONTROL MEASURE (ATCM) FOR CONSTRUCTION AND GRADING PROJECTS

The California Air Resources Board (CARB) adopted the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations with an effective date of November 19, 2002. This regulation applies to road construction and maintenance activities, construction and grading operations, and other operations in those geographic areas where naturally-occurring asbestos (NOA) is likely to be found and requires the best available dust mitigation measures to be followed to reduce exposure to airborne asbestos.

NOA is found in ultramafic rocks which includes serpentine. When this material is disturbed in connection with construction, grading, quarrying or surface mining operations, asbestos-containing dust can be generated. Exposure to asbestos can result in health impacts such as lung cancer, mesothelioma (cancer of the linings of the lungs and abdomen), and asbestosis (scarring of lung tissues that results in constricted breathing). Activities associated with construction, grading, quarrying, and surface mining in areas known to contain NOA can result in elevated levels of air-borne asbestos from these activities. The dust mitigation requirements of the ATCM are designed to reduce these levels.

The ATCM applies to any construction and grading operation that meet any of the following criteria:

- Any portion of the area to be disturbed is located in a geographic area designated as an ultramafic rock unit or ultrabasic rock unit on maps published by the Department of Conservation.¹
- Any portion of the area to be disturbed has ultramafic rock, serpentine or naturally-occurring asbestos on the site as determined by the District or the owner or the owner/operator.
- After the start of the operation, the District, a registered geologist or the owner/operator discovers ultramafic rock, serpentine or naturally-occurring asbestos is the area to be disturbed.

On the following page you will find a list of the most common types of operations that require control and also have reporting provisions. We encourage your staff to copy and utilize the checklist to assist and advise applicants who may engage in these operations. You can review the information and forms by going to our website at www.baaqmd.gov.

If you have any further needs, please call the District at the following numbers:



For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.



For further questions regarding this advisory or ATCM, email Janet Simon, Air Quality Specialist at jsimon@baaqmd.gov, or call (415) 749-4780.

¹ For the areas within the District: California Department of Conservation, Division of Mines and Geology, Regional Geologic Map Series, Scale 1:250,000, including the (1) Geologic Map of the Santa Rosa Quadrangle (set of five sheets), Compiled by Wagner, D.L. and Bortugno, E.J. (reprinted 1999) and (2) Geologic Map of San Francisco-San Jose Quadrangle (set of five sheets), By Wagner, D.L., Bortugno, E.J. and McJunkin, R.D., 1990.

Naturally Occurring Asbestos (NOA) Regulated Activities

The following types of operations are subject to the indicated control, administrative and reporting requirements under the asbestos ATCM for construction and grading operations:

For **Construction and Grading Operations** that will disturb more than one acre –

- Prepare and obtain District approval for an Asbestos Dust Mitigation Plan prior to any construction or grading activity;
- The Asbestos Dust Mitigation Plan must specify how the operation will minimize emissions and must address specific emission sources;
- Prevent visible emissions from crossing the project boundaries regardless of the size of the disturbance.

For **Construction and Grading Operations** that will disturb one acre or less –

- Vehicle speed is limited to 15 mph or less;
- Water must be applied prior to and during ground disturbance;
- Keep storage piles wet or covered;
- Track-out prevention and removal.

For **Road Construction and Maintenance Operations** –

- Must use dust control measures for a specified set of emission sources;
- Prevent visible emissions from crossing the project boundaries;
- The District must be notified before any work begins.

Homeowners and tenants working on their own residential property are exempt from the requirements for construction and grading operations of one acre or less and the notification requirement for discovery of NOA, serpentine or ultramafic rock after the start of any covered operation. Agricultural operations and timber harvesting are also exempt from ATCM, **except** for the construction of roads and structures in connection with those agricultural and timber operations.

In addition, the District may grant an exemption under any of the following conditions:

- If a geological evaluation demonstrates that ultramafic rock or serpentine is not likely to be found;
- For road construction and maintenance activities in a remote location;
- For the processing of rock from an alluvial deposit;
- For emergency road repairs, District notification may be delayed, with adequate documentation.

Records related to the applicability of the ATCM or compliance with the specific provisions of the ADMP must be kept for seven years. In addition, you must report the following to the District:

- Air monitoring or bulk sampling only if required by the District;
- Bulk sampling results documenting the applicability of, or compliance with, the ATCM;
- Other records specified in the dust mitigation plan.

For further questions call Janet Simon, Air Quality Specialist at (415) 749-4780.