

This Advisory is provided to inform you about activities of the District which may affect your operation. It will guide you in your effort to assist applicants regarding compliance with applicable air pollution rules and regulations.

**ATTENTION: BAY AREA BUILDING, PLANNING AND PUBLIC WORKS
DEPARTMENTS**

**SUBJECT: ASBESTOS CONTROL REQUIREMENTS FOR PIPE BURSTING AND PIPE
REAMING**

Pipe reaming and pipe bursting are processes which can be subject to the notification and emission control requirements in Bay Area Air Quality Management District (Air District) Regulation 11-2, Asbestos Demolition, Renovation and Manufacturing, and the U.S. Environmental Protection Agency (EPA), Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP).

These two processes become regulated activities when the existing pipe contains greater than 1% asbestos content. This type of asbestos cement pipe is often referred to as transite pipe. The bursting and reaming processes have been determined by EPA to make the transite pipe friable and therefore a regulated asbestos containing material (RACM) waste. These activities require notice to the Air District when 100 linear feet or greater is disturbed.

In addition to notification for reaming and bursting operations there are emission control regulations in effect during the pipe reaming process. During the reaming process the pipe is ground and mixed with soil and drilling fluids becoming a slurry before reaching the surface. Once at the surface, the slurry should be "adequately wet" and controlled so as not to release airborne visible emissions. The slurry must be properly containerized and labeled before sending it to an approved asbestos landfill. Because the pipe reaming process does not completely remove the pipe and pipe bursting leaves all the material in place, both processes have been determined by the EPA to create an active asbestos waste disposal site.

As a waste disposal site, every pipe bursting/reaming site would need to notify the Air District of the owner's intent to become an active asbestos landfill, meet deed restrictions, submit closure requirements and mapping documentation. In addition, any future tie-ins, right of way work, or any soil disturbance would require an additional 45 day notification of intent to disturb landfill material. As an asbestos landfill, other Federal, state, or local permit conditions may apply.

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 notification assistance please contact (415) 749-4762



For questions about this advisory please contact Brent Rudin, Supervising AQ Inspector at (415) 749-5128 or <mailto:brudin@baaqmd.gov>

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