

February 2, 2019

South Coast Air Quality Management District
 Rule 1403 Asbestos Notifications
 21865 E. Copley Drive
 Diamond Bar, CA 91765-4182

Re: Asbestos Procedure 5 Approval
 Clean up of ACM at the residential lane #5 of the Badlands Landfill located at
 31125 Ironwood Avenue, Moreno Valley, CA 92553

To: Asbestos Air Quality Inspector:

The following information is submitted on the behalf of Riverside County Department of Waste Resources for your approval of a Procedure 5 Asbestos Clean-up. This letter serves as a request for approval for the removal and clean-up of Asbestos Containing Material (ACM) acoustic in a pile of construction debris at the Badlands Landfill. Bulk analysis and a picture are provided within the attached report #AS2019-002, dated February 2, 2019.

Known Asbestos Containing Materials at the site are:

Material Description	Location	Asbestos Type %
White Acoustical Ceiling	Residential Lane #5 of the Badlands Landfill	5 % Chrysotile

Overview

A pile of construction debris (acoustical ceiling comingled with palm fronds and wood pulp) was dumped by a known individual at the Badlands Landfill, residential lane #5. The pile consisting of mostly wood pulp and some acoustical ceiling is approximately a 10 ft. x 10 ft. x 1 ft. is at the concrete, residential lane #5, within the landfill. The residential lane has been cordoned off, covered with 6 mil. Poly and secured. Inland Empire Environmental Consulting, performed an Asbestos Investigation on said location on January 30, 2019 (investigation report is attached, reference #AS2019-002 dated February 2, 2019).

The Riverside County Department of Waste Resources has laid 6-millimeter clear plastic with tires on top to cover the pile of debris which contains ACM. Attached to this Procedure 5.

All work will be performed by _____, a State of California Licensed Asbestos Abatement Contractor under the direct supervision of Inland Empire Environmental Consulting, who will provide a State of California Certified Asbestos Consultant (CAC), following all appropriate rules and regulations in accordance with the SCAQMD Rule 1403.

Extent of Abatement

The estimated quantity to be abated totals approximately 100 square feet of acoustical ceiling, wood pulp and palm fronds that are comingled. Because the material is known to contain > 1% asbestos, and has been generated from an uncontrolled disturbance, a "Procedure 5" of the South Coast Air Quality Management District's (SCAQMD) Rule 1403, shall be performed. _____ will perform the abatement in a controlled manner, in accordance with this Procedure 5 plan. This work will be scheduled to commence in February 2019, pending SCAQMD review and approval. Abatement activities will be monitored by Inland Empire Environmental Consulting, with asbestos quantities removed to be confirmed at the time of abatement.

Abatement Procedures

1. All work will be performed in a regulated work area, cordoned off with yellow caution tape. Demarcation and signage shall adhere to Title 8 CCR 1529 (k) (7).
2. The abatement contractor's employees are Certified Asbestos Workers and Supervisor.
3. The removal of the asbestos acoustical ceiling will be performed by the abatement contractor.
4. Frequently, wet the debris with a portable sprayer throughout the abatement. Enough water must be added to dampen the material to a depth of ½ inch.
5. All acoustical ceiling on the concrete pad shall be placed into a *clear*, 6-mil polyethylene, waste bags. All asbestos waste and contaminated waste will be double bagged and appropriately labeled with Asbestos warning labels, in accordance with the OSHA regulations.
6. The abatement work will be closely observed by a representative of Inland Empire Environmental Consulting.
7. Inland Empire Environmental Consulting will conduct perimeter air monitoring during the abatement activity. Air samples will be analyzed by Phase Contrast Microscopy (PCM). Similar PCM analysis was performed on an acoustical abatement at this landfill on October 18, 2018. Perimeter air sampling results were below the level of detection.
8. The asbestos abatement contractor and Inland Empire Environmental Consulting will inspect the work area and confirm that the ACM-has been completely and properly bagged and labeled.
9. A visual inspection will be performed by Inland Empire Environmental Consulting. once passed, a clearance letter will be issued.

Worker Protection and Decontamination

1. All workers performing abatement activities shall be protected at a minimum with half face, negative pressure respirators, equipped with HEPA (P-100) filters or better.
2. All abatement workers will wear a single Tyvek® (or equivalent type) full body protective suit, gloves and boots.
3. Following abatement, all workers shall remove their protective equipment, prior to leaving the regulated work area.
4. Workers may remove their suits only after leaving the abatement work area. Suits shall be HEPA-vacuumed prior to their removal and disposal. Respirators may be removed after the suits have been HEPA-vacuumed, Tyvek removed, bagged and worker has washed.
5. A three-stage decontamination assembly will be provided for workers, adjacent to the abatement area.

Disposal

1. Wrapped or bagged asbestos-containing materials (including suits and discarded PPE) shall be disposed of as Hazardous, friable asbestos waste.
2. Waste shall be evaluated "as removed" by the Owner and/or its Consultant. Any waste that is deemed "friable," must be bagged, for disposal as Asbestos Waste(hazardous). It will then be transported to a landfill that accepts Regulated Asbestos Containing Material (RACM). Riverside County Department of Waste Resources shall be listed as the generator of this waste, which will be disposed under their USEPA Identification Number.

Air Monitoring and Inspection Procedures

1. Inland Empire Environmental Consulting will provide a Cal/OSHA Certified Asbestos Consultant (CAC), to assure compliance with regulatory and contractual requirements, including this workplan.
2. The asbestos abatement contractor will collect personal breathing zone air samples of a representative number of workers; in accordance with CCR Title 8 Section 1529.
3. Inland Empire Environmental Consulting will provide visual observation of worker protection and control measures, and a post-cleaning visual inspection of the work area.
4. Inland Empire Environmental Consulting will collect perimeter air samples on the site to be analyzed by Phase Contrast Microscopy (PCM). The standard of cleanliness for the air samples shall be 0.01 fibers/cc.
5. A copy of the clearance letter including detailed observations and air sample results collected by Inland Empire Environmental Consulting during the abatement activities, will be provided to the Owner, and to SCAQMD (upon request).

If you need any further information or have any questions regarding this work plan, please contact me at (951) 675-4062.

Regards,

Heidi Barrios, MBA, REHS, CAC
Certified Asbestos Consultant
DOSH # 17-5974



Asbestos Abatement Contractor

Asbestos Contractor Acknowledgement to adhere to these procedures upon approval by SCAQMD.

Name
Address
STATE LICENSE \$ _____, OSHA REGISTRATION # _____
Phone
Fax

Print Name: _____

Signature: _____

Title: _____

Date: _____

SCAQMD Approval # _____