Working Group Meeting #1
Proposed Amended Rule 1403 -
Asbestos Emissions from Demolition/Renovation Activities

May 25, 2018
SCAQMD Headquarters
Diamond Bar, CA
AGENDA
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Background
  - Common ACM Encountered
  - Health Effects

- Rule Applicability
  - Current Requirements

- Issues encountered

- Rule Development Goals

- Potential Revisions
  - Notification
  - Sampling
  - Surveys
  - Applicability

- Tentative Schedule
BACKGROUND
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Intended to minimize exposure to asbestos fibers from demolition/renovation activities
- Originally adopted October 1989; amended several times since
  - Align with Federal requirements (40 CFR Part 61, Subpart M)
  - Provide rule clarifications
  - Rule enhancements
COMMON ACM ENCOUNTERED

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

✓ Ceilings and drywall components
✓ Flooring and roofing
✓ Pipe, Insulation, HVAC insulation
✓ Various industrial applications
HEALTH RISKS
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

✓ Asbestosis – inflammation & scarring of the lung tissue
✓ Lung Cancer
✓ Mesothelioma – cancer of the pleural or lung lining(s)
✓ Pleural plaques
✓ Cancer of the esophagus, stomach, colon, & pancreas

* Smoking increases this risk substantially
RULE APPLICABILITY
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Covers owners and operators of any:
  - Demolition or renovation activity, and the associated disturbance of asbestos containing material
  - Asbestos storage facility
  - Active waste disposal site

- Affected facilities include:
  - Any person who owns, leases, operates, controls or supervises the demolition and/or renovation activities at the facility being demolished or renovated. This includes property owners.
CURRENT REQUIREMENTS
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Survey/inspect for the presence of asbestos
  - Notification
    - > 1% ACM
    - 10 working day notification before beginning work with limited exceptions

- Work practices / Removal procedures
  - Five (5) procedures (HEPA, glove bag, wetting, dry, or approved alternative)
  - Handling procedures (packaging, labeling, signage, markings, etc.)

- Waste disposal
  - Transportation & landfill requirements

- Rule 1403 also applies to single family dwellings
ISSUES ENCOUNTERED
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Incomplete sampling and surveys
- Inadequate number of samples, composite sampling
- Lack of a Chain of Custody on samples
- Uncertainty with lab results (PLM vs. more stringent analysis)
- Misapplication of the Planned Renovation
ISSUES ENCOUNTERED

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Unrevised start/end dates of Notifications
- Suspicious use of Emergency Notifications
- Information is lacking on Notifications
- Inadequate recordkeeping & on-site availability of records
RULE DEVELOPMENT GOALS
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

- Rule 1403 has not been amended since October 5, 2007
  - Seek to clarify any ambiguities since these amendments

- Clarify and streamline rule language
  - Clarify areas of uncertainty or language
  - Clarify applicability of the rule
  - Remove obsolete language, correct typographical errors
  - Review & update rule definitions
  - Seek opportunities to streamline rule requirements
POTENTIAL REVISIONS - APPLICABILITY

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

✓ Clarify rule is applicable to property and facility site owners
✓ Clarify that rule is applicable to persons, as defined in the rule, preparing all documents required by Rule 1403
✓ Clarify that rule is applicable to contractors, sub contractors, and owners/operators of demolition/renovation
✓ Clarify definitions in the rule for facility, person, owner, owner-operator of renovation/demolition activity
POTENTIAL REVISIONS - NOTIFICATIONS

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

☑ Use only the Online Web Application
  ▪ Remove sections referencing paper notification
☑ Clarification: Notifications shall be completed & submitted by person doing the actual work
☑ Require the Certified Asbestos Consultant (CAC) contact information on the notification
☑ Require copy of Survey with notification
☑ Provide schedule of intended operations along with the Notification
POTENTIAL REVISIONS - SURVEYS

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

✓ Survey shall be included with the notification

✓ No composite sampling techniques allowed for compliance with Rule 1403 requirements
  ▪ Clarify homogenous sampling
  ▪ Minimum quantity of slides mounts

✓ Clarify number of samples required for proper assessment

✓ Survey shall include Chain of Custody
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

✓ 3 slide mounts required for PLM

✓ Minimum 3 samples for each suspected ACM
  - AHERA requirements

✓ If asbestos result is less than 1.0% by PLM:
  - CAC may assume material is ACM and, thus, subject to Rule 1403 or perform a more precise analysis
  - Homogenous sampling
TENTATIVE SCHEDULE
Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

➢ Working Group Meeting #1 ................................ May 25, 2018
➢ (Additional) Working Group Meetings ......................... As Needed
➢ Public Workshop .................................................. August 29, 2018
➢ SSC ................................................................. November 16, 2018
➢ Public Hearing .................................................. December 7, 2018
For more information, questions, or comments:
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