

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

INTER-OFFICE MEMORANDUM

September 24, 2004

To: Cheryl Creson, County of Sacramento
Michael Johnson, City of Folsom

From: Larry Greene, APCO
Sacramento Metropolitan Air Quality Management District



Subject: **Air Toxic Control Measure (ATCM) Jurisdiction**

On July 21, 2004, the California Department of Toxic Substances Control (DTSC) notified the Sacramento Metropolitan Air Quality Management District (District) that it had discovered naturally occurring asbestos (NOA) at the Lago Vista High School site in Folsom. The District consulted with the Department of Conservation, California Geological Survey (CGS) to review this discovery and geologic conditions in the area. The District requested guidance from the CGS in determining, based on the evidence available, what portions of the area around Folsom should be required to meet the state Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations.

The CGS has since informed us that the area where NOA has been found is part of the Copper Hill volcanics geologic unit, which consists of "metamorphosed intermediate to mafic composition volcanic rocks, which generally have a low to moderate potential for NOA." During meetings to discuss these findings, CGS staff also indicated that, although the likelihood of finding NOA in this type of geologic unit was generally low to moderate, the discovery of NOA at the Lago Vista High School site, coupled with NOA occurrences along fault zones documented in a 1983 study, make it more likely that NOA will be found in other parts of the Copper Hill area, particularly where fault or shear zones are present. And, since initially consulting with the CGS, the District has learned that NOA has been found in nine locations in the Elliott Homes Empire Ranch Development.

The CGS also informed the District that occurrences of NOA are typically small and irregular, and that individual sites within the Copper Hill volcanics unit may not contain NOA, but that it is not possible to determine at this point which areas within the region do not have NOA. A site-specific investigation would be required to make such a determination.

The conditions described above may also pertain to the Gopher Ridge volcanics unit, which is geologically similar to the Copper Hill volcanics unit, located in the southeastern portion of Sacramento County.

Because of the health risks associated with asbestos, and the recent asbestos discoveries, I have determined that the District will require compliance with the asbestos ATCM throughout the geographic areas containing the Copper Hill volcanics and Gopher Ridge volcanics unit shown on the 1:250,000 scale geologic map of the Sacramento quadrangle; however, because it is possible that individual sites

Cheryl Creson, County of Sacramento
Michael Johnson, City of Folsom
September 24, 2004
Page 2

within these areas do not contain asbestos, property owners and developers may also opt to test for the presence of asbestos, consistent with provisions of the ATCM, and submit those test results to the District. If the tests do not detect the presence of asbestos, the District will not require compliance with ATCM mitigation measures at that site. This determination is subject to further refinement at such time as a more detailed map for the eastern portion of Sacramento County identifying areas more likely to contain NOA is developed by the California Geological Survey.

For further information regarding the District's implementation of the ATCM, please contact Jack Momperler at 874-4869 for technical assistance, or Kerry Shearer at 874-4810 for more general questions.