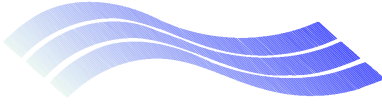


SACRAMENTO METROPOLITAN



AIR QUALITY  
MANAGEMENT DISTRICT

Compliance Assistance

# ADVISORY

SUBJECT: New Sampling Requirements for Concrete

**ADVISORY #16-02**

**September 2016**

## **IMPORTANT INFORMATION FOR ALL ASBESTOS CONSULTANTS, SITE SURVEILLANCE TECHNICIANS AND NESHP BUILDING INSPECTORS**

### **BACKGROUND**

The Sacramento Metropolitan Air Quality Management District (Sacramento AQMD), under Rule 902, and the United States Environmental Protection Agency (US EPA), under National Emission Standards for Hazardous Air Pollutants (NESHP) CFR 61, Part M, require that an asbestos survey be conducted prior to the renovation or demolition of any facility subject to these regulations and that samples of suspect material be tested for asbestos content. The presence or absence of asbestos cannot be determined without a survey.

There were previously no survey and testing requirements for concrete (with the exception of bridges and pools or other structures that have a higher likelihood of containing asbestos). Under SB 1374 California's Green Building Standards Code (CALGreen) requires the diversion of 50% of the waste generated from certain demolition projects. In addition, all California cities are required by state law (AB 939) to recycle a minimum of 50% of all municipal solid waste generated within the jurisdiction. Because workers and the public may be exposed to asbestos during the demolition and recycling process, it is important for concrete to also be surveyed and tested prior to its disturbance.

### **CURRENT REQUIREMENT**

The purpose of this advisory is to notify the asbestos consultant community that the US EPA has determined concrete is a suspect asbestos-containing building material. Sacramento AQMD considers concrete to be a miscellaneous material and the Asbestos Hazard Emergency Response Act (AHERA) requires a sampling frequency of "sufficient to determine" for miscellaneous materials.

Therefore, effective immediately, the Sacramento AQMD will require sampling of concrete building materials for jurisdictional renovation and demolition projects where concrete will be disturbed. This new concrete sampling requirement and the proper removal of asbestos-containing concrete will prevent the reintroduction of asbestos, both into the air when concrete is disturbed or crushed and when it is incorporated into new concrete products after recycling.

### **MORE INFORMATION**

To view the asbestos page on our website, please visit [airquality.org](http://airquality.org) and navigate to the Asbestos page. You may also call the Sacramento AQMD asbestos consultation line at (916) 874-4800 for assistance with any asbestos requirements.