



Bayview Hunters Point Lennar Parcel A'
San Francisco, CA
Ambient Monitoring Network for
Naturally Occurring Asbestos

FACT SHEET

December 6, 2010

The Air Resources Board's Naturally-Occurring Asbestos (NOA) Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations grants local air districts the authority to require NOA air monitoring for projects that are subject to the ATCM.¹ The ATCM proscribes that a 24-hour Transmission Electron Microscopy (TEM) analysis be performed in accordance with a modified version of the Asbestos Hazard Emergency Response Act (AHERA) test method.² The Bay Area Air Quality Management District (Air District) required ambient monitoring of naturally occurring asbestos as part of the October 7, 2005 Asbestos Dust Mitigation Plan (ADMP) to help quantify any potential exposures to asbestos and help ensure public health exposures remained at levels that are less than significant. Routine monitoring results provide (1) valuable data to determine health risk exposures according to state guidelines³ and (2) daily results that help to identify any elevated levels that can then trigger a stop in construction activities that might be contributing to the elevated levels. Construction work must remain halted until monitoring results decline below the trigger level.⁴

BAAQMD Monitoring Network (District Monitors)

The Air District requires 5 ambient monitors (identified as District Monitors HV-1, HV-2, HV-4, HV-5, HV-6) to be run every day there is dust generating construction activity at the project. The monitors are located around the project boundaries and are positioned to provide upwind and downwind readings, to the extent possible, given the variations in wind direction and the fact that the samples are run for a 24-hr period. Consistently, these monitors have shown that the ambient levels of asbestos around the Lennar BVHP Parcel A' project are below significance levels that would pose a health risk.

SFHD Monitoring Network (Community Monitors)

The City of San Francisco Health Department has established 5 additional ambient monitors (identified as Community Monitors HVc-7, HVc-8, HVc-9, HVc-11, HVc-12) and 4 are run on a daily basis with HVc-8 located upwind of project randomly sampled 1 day per week. HVc-12 is located on the dirt shoulder adjacent to the roadway and results do not represent dust generating construction activities from the Lennar project, therefore the data from HVc-12 is collected for information only. The Community Monitors were established under a separate agreement amongst the City of San Francisco, Lennar, and

¹ California Code of Regulation, Title 17, Section 93105, Subpart (g)(1).

² California Code of Regulation, Title 17, Section 93105, Subpart (h)(3).

³ California State Office of Environmental Health Hazard Assessment establishes health risk assessment guidelines for toxic compounds.

⁴ Monitoring results in excess of 16,000 structures per cubic meter of air as measured by Transmission Electron Microscope analysis.

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some community representatives and are run by City of San Francisco subcontractors. The Community Monitors were added as supplemental to the District Monitors that are more than adequate to assess health risk and to monitor the project's emissions.



ADMP Revision

On August 4, 2009, the Air District required Lennar to revise the Asbestos Dust Mitigation Plan. The new plan includes 14 additional dust control measures to minimize emissions from dust generating construction activity and incorporates 4 community monitors into the project stop work trigger level. Since August 4, 2009 there have been 8 days (Aug 12, 18, 20, 21; Oct 15, 29; & Feb 16, 26, 2010) where Lennar was required to stop dust generating construction activity until ambient levels declined below trigger levels. The results from the Community Monitors have also shown that the ambient levels of asbestos around the Lennar BVHP Parcel A' project are below significance levels that would pose a health risk.

Nine ambient asbestos monitors run on a daily basis and one monitor (HVC-8) runs on a random day, each week. HVC-8 is a portable monitor and when it is not running, it is removed from the site to prevent theft and vandalism. The normal appearance of the HVC-8 monitoring site on a non-monitoring day is abandoned.