



Tuesday August 25, 2020

Joseph Helo

Disaster Recovery Housing Program Manager

Department of Housing and Community Development

Division of Financial Assistance

2020 W. El Camino Avenue, Suite 670, 95833

P. O. Box 952054

Sacramento, CA 94252-2054

Dear Mr. Helo:

The San Diego Air Pollution Control District (District) appreciates the opportunity to provide input on the Tiered Environmental Review of Single-Family Home Projects in San Diego County (2017 Community Development Block Grant Disaster Recovery). The District is mandated under federal and state law to regulate air pollutant emissions and improve air quality to protect public health and the environment. Accordingly, the District operates a countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The District's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas. The following information is provided to help those entities and individuals involved with this project achieve compliance with local, State and Federal air quality standards.

Equipment Potentially Requiring Permits

The District's permitting program has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. District [Rule 10](#) requires that any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminant, shall first obtain written authorization for such construction from the District.

Examples of air contaminants include carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, sulfur dioxide or toxic air contaminants, which can negatively impact public health. District [Rule 11](#) lists exemptions for equipment or processes that do not emit a significant amounts of air pollutants.



Asbestos

Asbestos is a known human carcinogen and the primary route of exposure is through inhalation of asbestos fibers. More information on the health effects of asbestos may be found at <https://www.epa.gov/asbestos/learn-about-asbestos#effects>. As such, APCD [Rule 1206](#) incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) and includes additional requirements to minimize exposure to asbestos fibers.

APCD [Rule 1206](#) requires a facility survey for certain projects to determine if asbestos is present prior to commencement of renovation or demolition. Persons conducting facility surveys shall have taken and passed a current EPA-approved Building Inspector Course. The asbestos content shall be analyzed by a laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP).

If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the APCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with District Rule 1206.

Dust

Projects or operation that can generate fugitive dust emissions may be subject to the following APCD rules:

- APCD [Rule 50](#), *Visible Emissions*, which states air contaminants shall not be discharged into the atmosphere for a period or periods aggregating more than three minutes in any period of 60 consecutive minutes which is darker in shade than a number 1 on the Ringlemann Chart (20% opacity).
- APCD [Rule 51](#), *Nuisance*, which states “*a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.*”

In addition to the rules listed above, any commercial construction or demolition activity capable of generating fugitive dust emissions may be subject to District [Rule 55](#), *Fugitive Dust Control*. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out.

Odors

Projects or operations causing odors might be subject to Rule 51 - Nuisance, which states “*a person shall not discharge from any source whatsoever such quantities of air contaminants or other material*



which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals.”

Architectural Coatings (paints, varnishes, sealers, and stains)

Any project applying coatings to stationary structures and their accessories (appurtenance) at the site of installation may be subject to District [Rule 67.0.1](#) – Architectural Coatings. Structure accessories include fixtures, doors, fences, railings, stairways, etc. These coatings shall comply with volatile organic compound (VOC) limits stated in the Rule.

Off-Road Construction Equipment

Any project using Off-road vehicles that are diesel-powered, self-propelled, and 25 horsepower or greater must be registered under the current owner with the California Air Resources Board (CARB) Diesel Off-Road Online Reporting System (DOORS). Each vehicle is assigned an Equipment Identification Number (EIN) which must be labeled on both sides of the vehicle. Fleets must meet emission targets.

Fleets must limit their unnecessary idling to 5 minutes; there are exceptions for vehicles that need to idle to perform work (such as a crane providing hydraulic power to the boom), vehicles being serviced, or in a queue waiting for work.

Written Idling Policy – Medium fleets (total max hp 2,501 – 5,000) and large fleets (total max hp greater than 5,000 hp) must also have a written idling policy that is made available to operators of the vehicles and informs them that idling is limited to 5 consecutive minutes or less.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Keehan'.

Kathleen Keehan, AICP

Supervising Air Resources Specialist – Planning and Incentives

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