



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

October 29, 2020

Chris Yama
ACC Environmental Consultants Inc.
7977 Capwell Drive, Suite 100
Oakland, CA 94621

Re: ADMP RIN NOA-0192 Revision #3
Project: Potrero Hill Phase 2 Demolition Project
Applicant: BRIDGE Potrero Community Associates, LLC

Dear Mr. Yama,

This letter is in response to the proposed Revised Asbestos Dust Mitigation Plan (ADMP) referenced above for the subject project submitted to the Bay Area Air Quality Management District (Air District) by ACC Environmental Consultants Inc. on behalf of BRIDGE Potrero Community Associates, LLC for the Potrero Hill Phase 2 Demolition Project in San Francisco (project). The Revised ADMP was submitted pursuant to subsection (e)(2)(A) of the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, Section 93105, Title 17, California Code of Regulations (Asbestos ATCM).

The reference identification number (RIN) for this ADMP remains **NOA-0192**. Please refer to the RIN for any inquiries or submittals to the Air District regarding this ADMP.

The Air District received the final Revised ADMP application on October 29, 2020 proposing to add two additional work areas to the project for capping utilities on 26th Street. One temporary air monitoring station will be placed downwind at each additional work area to provide representative coverage of the activities.

The Air District has determined that the proposed Revised ADMP meets the applicable criteria pursuant to subsection (e)(4) of the Asbestos ATCM, and, thus, it is hereby approved. The Air District shall be notified upon commencement and completion of the utility capping construction and grading and air monitoring activities. The dust mitigation measures and air monitoring protocols enumerated in Sections 5 and 7 of this Revised ADMP shall continue to be adhered to throughout the duration of construction and/or grading activities at the project.

Any questions you may have regarding this Revised ADMP should be directed to Eliza Kane, Supervising Air Quality Specialist, at (415) 749-5097.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Gove".

Jeff Gove
Director of Compliance and Enforcement



**ASBESTOS DUST MITIGATION PLAN
POTRERO HILL HOPE SF, PHASE TWO INFRASTRUCTURE
1801-1915 25TH STREET
BLOCKS A AND B
SAN FRANCISCO, CALIFORNIA 94107**

**FEBRUARY 4, 2020
REVISED ON MAY 14, 2020
REVISED ON OCTOBER 6, 2020
REVISED ON OCTOBER 29, 2020**

PREPARED FOR:

BRIDGE HOUSING
600 CALIFORNIA STREET, SUITE 900
SAN FRANCISCO, CA 94108

PREPARED BY:

ACC ENVIRONMENTAL CONSULTANTS, INC.

STEPHEN JACKSON
SENIOR PROJECT MANAGER
CERTIFIED ASBESTOS CONSULTANT #95-1782

CHRIS YAMA
SENIOR PROJECT MANAGER
CERTIFIED ASBESTOS CONSULTANT #98-2356

ACC PROJECT NUMBER: 1418-011.01

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	SCOPE OF SITE UPGRADES	1
3.0	ADMP Applicability	1
4.0	POTENTIAL RECEPTORS	1
5.0	ASBESTOS DUST MITIGATION PROCEDURES.....	2
5.1	Track-Out onto the Paved Public Road	2
5.2	Active Storage Piles	2
5.3	Inactive Disturbed Areas & Storage Piles	2
5.4	Traffic on On-Site Unpaved Roads, Parking Lots, and Staging Areas	2
5.5	Earthmoving Activities.....	3
5.6	Off-Site Transport	3
5.7	Post Construction Stabilization of Disturbed Areas	3
5.8	Contingency Dust Control Measures.....	3
6.0	RECORDKEEPING.....	4
7.0	PERIMETER AIR TESTING.....	5

ATTACHMENTS

FIGURES

Figure 1 – Site Location Map

Figure 2 – Site Geologic Map

Figure 3 – Wind Rose Diagram

Figure 4 – Site Plan

Figure 5 – Site Plan for Cutting and Capping Gas and Water Mains

APPENDICES

Appendix A – Asbestos Testing Results from EnGeo Soils Investigation Report

1.0 INTRODUCTION

This Asbestos Dust Mitigation Plan (ADMP) was prepared by ACC Environmental Consultants, Inc. (ACC) on behalf of Bridge Housing (Bridge) for the Potrero Hill Hope SF, Phase 2 project located at 1801-1915 25th Street in San Francisco, California 94107 (Site). This ADMP is based on applicable portions of CCR Title 17, Section 93105 (Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations) and will be implemented during all construction and grading activities or other similar activity likely to disturb soil or bedrock at the Site. As stated in CCR Title 17, Section 93105 (e)(4), the ADMP must specify dust mitigation practices which are sufficient to ensure that no equipment or operation emits dust that is visible crossing the property line. Bridge and their Consultants & Contractor's will be responsible for assuring that this ADMP is implemented.

2.0 SCOPE OF SITE UPGRADES

The Site is identified by the San Francisco Office of the Assessor-Recorder as (Block/Lot 4285B/-) and has an area of approximately 4.5 acres. **The Site was developed with eight San Francisco Housing Authority Apartment Buildings. All eight existing buildings have been demolished. The maximum depth of excavation is expected to be fifteen feet below surface.**

Activities that will be performed for Preconstruction of Phase 2 Infrastructure include:

- a. Excavating and capping existing Utilities
- b. Staging spoils generated from trenching
- c. Backfilling trenches

The project will start upon approval of this ADMP revision. The anticipated project start date is November 2, 2020 and a final completion date of January 25, 2021.

Future development plans for the site are still being developed. Once plans have been finalized this plan will be amended or a new application will be submitted.

3.0 ADMP APPLICABILITY

Soil sampling conducted by Engeo; Inc. indicates that soils beneath the Site contain naturally occurring asbestos (NOA) A copy of the asbestos analysis results can be found in Appendix A. The Site is located in a geographic ultramafic rock unit (GURU) on the California Geological Survey, Geologic Data Map, No.2 (Jennings, 1977). The geologic units mapped underlying the Site are described as sheared to badly sheared serpentine within the Cretaceous and Jurassic Franciscan Complex. See Figure 1 for Site Location Map and Figure 2 for Site Geologic Map. CCR Title 17, Section 93105 applies to a project in which any portion of the area to be disturbed has naturally occurring asbestos, serpentine, or ultramafic rock. No construction or grading activities will occur at the Site prior to receiving Bay Area Air Quality Management District (BAAQMD) approval of this ADMP.

4.0 POTENTIAL RECEPTORS

Land use within 0.25 miles of the project site is generally residential with a school, parks and open space

and light/heavy industrial use. The Potrero Terrace Nursery and School and Starr King Elementary School are located 0.1 miles to the north-east of the site. The Rise Institute is located approximately 0.2 miles to the southeast of the site. The Potrero Recreation Center is located approximately 0.22 miles to the North of the site.

5.0 ASBESTOS DUST MITIGATION PROCEDURES

Dust control measures will be implemented at the beginning and maintained throughout all construction and grading activities for the duration of the project.

Construction and grading activities include any disturbance of surface or stockpiles conducted with powered equipment or any related activity including, but not limited to, all surface and subsurface cuts and fills, excavation, material loading, trenching, stockpiling, auger drilling, bulldozing, and landfilling.

5.1 Track-Out onto the Paved Public Road

All of the following will be implemented as track-out prevention and control measures:

- Removal of any visible track-out from a paved public road at any location where vehicles exit the work site using wet sweeping or a HEPA filter equipped vacuum device at the end of the workday or at least one time per day; and
- A stabilized vehicle entrance/exit will be constructed using 4” minus rock with fabric underneath and a rumble strip (tire shaker); and
- A wheel wash system.

5.2 Active Storage Piles

Active storage piles will be adequately wetted with water or covered with tarps to prevent airborne soil dust.

5.3 Inactive Disturbed Areas & Storage Piles

Control measures for disturbed areas and storage piles that will remain inactive for more than seven days shall include one or more of the following:

- Keep the surface adequately wetted;
- Covering the disturbed surface or storage pile with tarps or vegetative cover; or
- Compacting the disturbed surfaces and capping them with the dust suppressant Gorilla Snot or equivalent, according to the manufacturers’ recommendations.

5.4 Traffic on On-Site Unpaved Roads, Parking Lots, and Staging Areas

All of the following will be implemented as controls for traffic on on-site unpaved roads, parking lots,

and staging areas:

- A maximum vehicle speed limit of fifteen miles per hour or less; and
- Watering every two hours of active operations or sufficiently often to keep the area adequately wetted.

5.5 Earthmoving Activities

All of the following controls will be implemented during earthmoving activities:

- Applying sufficient water to the area to be disturbed to prevent visible emissions from crossing the property line;
- Pre-wetting the ground to the depth of anticipated cuts;
- Suspending grading operations when wind speeds are high enough to result in dust emissions crossing the property line despite the application of dust mitigation measures.

5.6 Off-Site Transport

All of the following controls will be implemented for off-site transport:

- Trucks will be maintained so that no spillage can occur from holes or other openings in cargo compartments;
- Truck loads will be adequately wetted with water; and
- Trucks will be either covered with tarps or loaded such that the material does not touch the front, back, or sides of the cargo compartment at any point less than six inches from the top and that no point of the load extends above the top of the cargo compartment.

5.7 Post Construction Stabilization of Disturbed Areas

Disturbed areas will be stabilized using one or more of the following methods upon completion of the project:

- Establishment of a vegetative cover; or
- Placement of at least three inches of non-asbestos-containing material.

5.8 Contingency Dust Control Measures

In the event that the proposed dust control measures are not adequate to achieve the air monitoring action level goals, or the above measures are unsuccessful at controlling dust emissions from construction and grading activities, one or more of the following secondary measures will be implemented until the condition stabilizes:

- Reduce the site speed limit to five miles per hour.
- Increase frequency of track out clean up to twice daily, once during middle of work shift and once prior to end of shift.
- Utilize DirtGlue, **Gorilla Snot** or similar product to create a crust on stockpiles. This crust will minimize dust generated from stockpiles and shall be sufficient to satisfy the test in subsection (h)(6).
- Increased water usage. Evaluate water usage and increase watering frequency with additional hoses/laborers.
- Deploy handheld particulate monitors to evaluate site work activities. Determine task specific controls to minimize airborne asbestos.
- Install Construction fencing with fabric around the perimeter of the project area. (Note: installed in March of 2020)

6.0 RECORDKEEPING

Recordkeeping Requirements: The owner/operator will maintain all of the following records for at least seven (7) years following the completion of the construction project:

1. The results of any air monitoring conducted at the request of the APCO;
2. The documentation for any geologic evaluation conducted on the property for the purposes of obtaining an exemption, except the archive of collected samples which may be discarded at the expiration of the exemption or one (1) year after the exemption is granted whichever is less; and
3. The results of any asbestos bulk sampling that meets any of the following conditions:
 - i. The asbestos bulk sampling was conducted by the owner/operator to document the applicability of or compliance with this section, or
 - ii. The asbestos bulk sampling was done at the request of the district APCO.

7.0 PERIMETER AIR TESTING

To determine the effectiveness of the dust mitigation measures described in this ADMP, the BAAQMD requires airborne asbestos perimeter monitoring during all construction and grading activities or other similar activity likely to disturb soil or bedrock at the Site for the duration of the project. Construction and grading activities or other similar activity will occur at all areas of the project concurrently. Construction and grading activities include any disturbance of surface soils or stockpiles conducted with powered equipment or any related activity including but not limited to subsurface cuts and fills, excavation, material loading, trenching, auger drilling, bulldozing, and landfilling.

Wind speed and direction data were provided by BAAQMD from the San Francisco Sewage Treatment Plant. The data were used to generate a wind rose presented in Figure 3 attached. The wind rose was used to determine appropriate air monitoring locations. The wind direction at the site is predominantly from the west-southwest.

The attached Figure 4 shows the three locations (upwind, downwind and crosswind) where air testing will be conducted during construction and grading activities. A weather station will be set up during

construction and grading to monitor wind direction at the Site. Data generated by the onsite weather station shall be used for informative purposes only and will not be used for the decision making with regard to dust mitigation measure or modifications to the air monitoring network.

The attached Figures 5 and 5a show four downwind locations where air testing will be conducted during trenching and backfilling of the gas main and water mains. The approximate size of each trench/bellhole is expected to be five foot by five foot and five feet deep. Please note that the water and gas mains are in the street and sidewalk adjacent to the main site. BAAQMD will be notified prior to starting trenching and when backfilling is completed.

Collection of air samples will be conducted by a State of California certified asbestos professional utilizing high volume sampling pumps utilizing 0.45-micron air sampling MCE cassettes. Samples will be collected during 8-hour work shifts and will be analyzed by transmission electron microscopy (TEM) following the CARB Modified AHERA method with an analytical sensitivity of 0.001 structures per cubic centimeter (s/cm^3). The action level will be $0.0016 \text{ s}/\text{cm}^3$. Baseline air testing for asbestos may be conducted prior to disturbance of NOA-containing soils.

Air sampling cassettes will be situated at a 45-degree angle approximately 4 to 5 feet above the ground surface. No monitor will be moved more than 50 feet from the location described in this plan without notifying and receiving approval from BAAQMD.

Sampling equipment must have unrestricted airflow in an arc of at least 180 degrees, which includes the predominant wind direction with the greatest potential for asbestos concentration to occur. The monitoring probe will be located a minimum of two meters away from all obstructions. This includes but is not limited to vertical walls, buildings, site equipment, stockpiles, wind screens, vehicles, and vegetation over 12 inches high. When possible, the monitoring probe will be located at least 10 meters away from the drip line of trees and 10 meters away from buildings. Obstructions that may impact airflow should be reevaluated regularly given that local obstructions can change due to human activities and vegetation growth.

The TEM analytical sensitivity shall be $0.001 \text{ s}/\text{cm}^3$. All asbestos structures with an aspect ratio greater than three to one (3:1) shall be counted irrespective of length. The results of the analyses of air samples shall be reported as transmission electron microscopy (TEM) asbestos s/cm^3 .

All QA/QC procedures, data, and related records will be made available upon request. Air monitoring results will be reported to BAAQMD on a bi-weekly basis (every two weeks) unless BAAQMD requires more frequent reporting based on long term concentration results.

In the event that ambient air monitoring results within the monitoring network indicate levels equal to or greater than $0.016 \text{ s}/\text{cm}^3$ from any airborne asbestos monitor, Bridge/ACC shall notify BAAQMD as soon as practical but no later than the close of business on the next business day after the day that the lab report was received. The notification shall include the monitoring results indicating sampler ID, location, actual TEM structures per cubic centimeter (or meter), sample date, and analysis date. An evaluation will be made of site operations and employed mitigation measures for the day of elevated reading(s); the evaluation will also include a root cause analysis of probable cause or causes of the

elevated reading(s). Additional dust mitigation measures identified in Section 5.8, will be implemented to address identified cause(s) in order to reduce airborne asbestos. These measures shall remain in place until all monitors within the monitoring network are less than 0.016 s/cm^3 . The causal analysis and implemented measures to reduce airborne asbestos concentrations will be recorded and submitted electronically to compliance@baaqmd.gov within 2 business days from the time the lab report was received.

Figure 1
Site Location Map

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BASE MAP SOURCE: GOOGLE EARTH MAPPING SERVICES



VICINITY MAP
POTRERO BLOCK X
SAN FRANCISCO, CALIFORNIA

PROJECT NO.: 8683.000.000

SCALE: AS SHOWN

DRAWN BY: DLB

CHECKED BY: BF

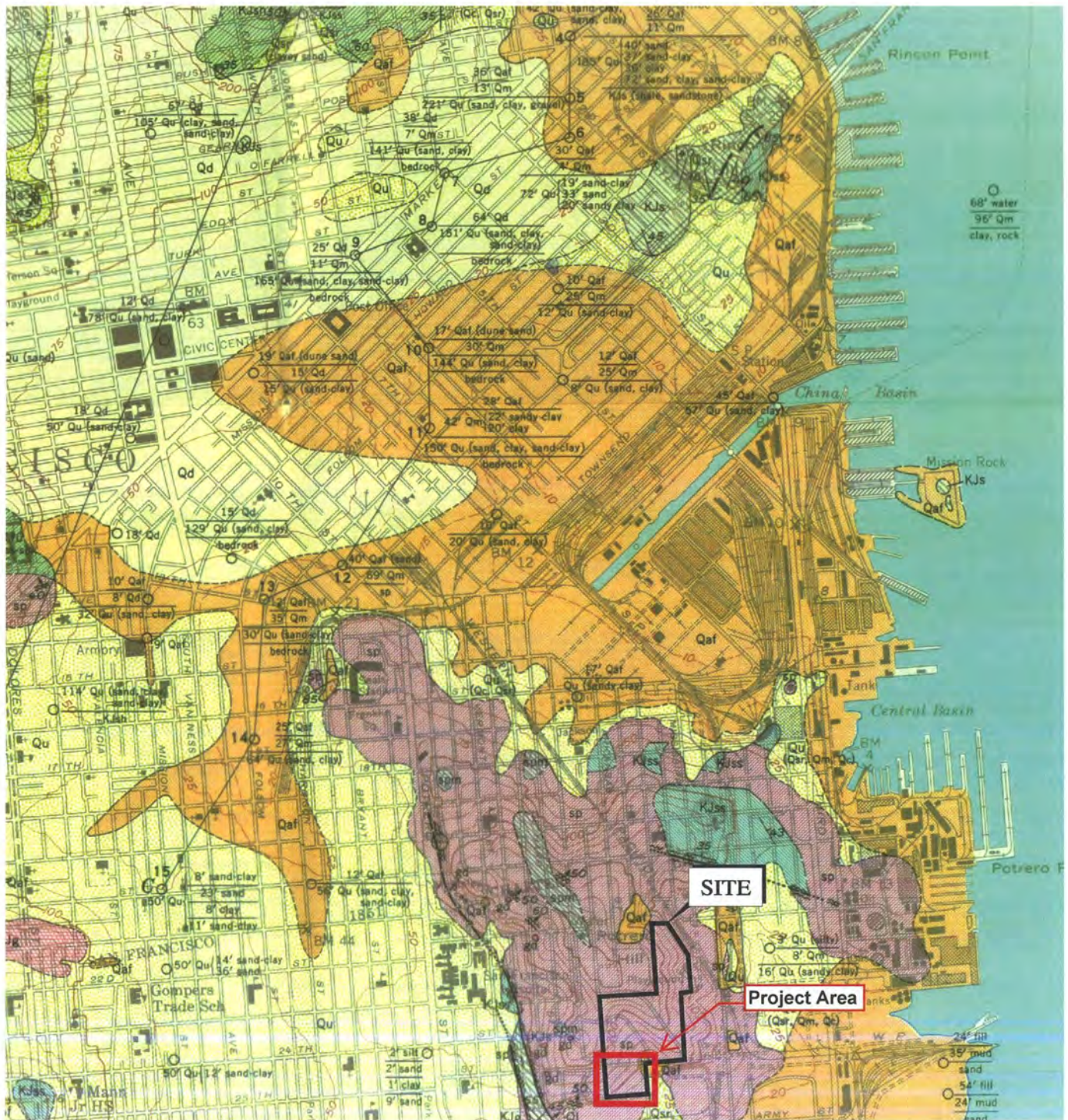
FIGURE NO.

1

ORIGINAL FIGURE PRINTED IN COLOR

Figure 1 - Site Location Map

Figure 2
Site Geologic Map



EXPLANATION

- Qaf** ARTIFICIAL FILL
- Qsr** SLOPE DEBRIS AND RAVINE FILL
- Sp** SERPENTINE



Figure 2 - Site Geologic Map

BASE MAP SOURCE: SCHLOCKER, 1958

ENGEO
Expect Excellence

REGIONAL GEOLOGIC MAP
POTRERO ANNEX AND TERRACE
SAN FRANCISCO, CALIFORNIA

PROJECT NO.: 8683.000.000

DATE: JULY 2009

DRAWN BY: SRP

CHECKED BY: BF

FIGURE NO

Figure 3
Wind Rose Diagram



Windrose Data, 2019 Data

Potrero Hill Hope SF, Phase II,

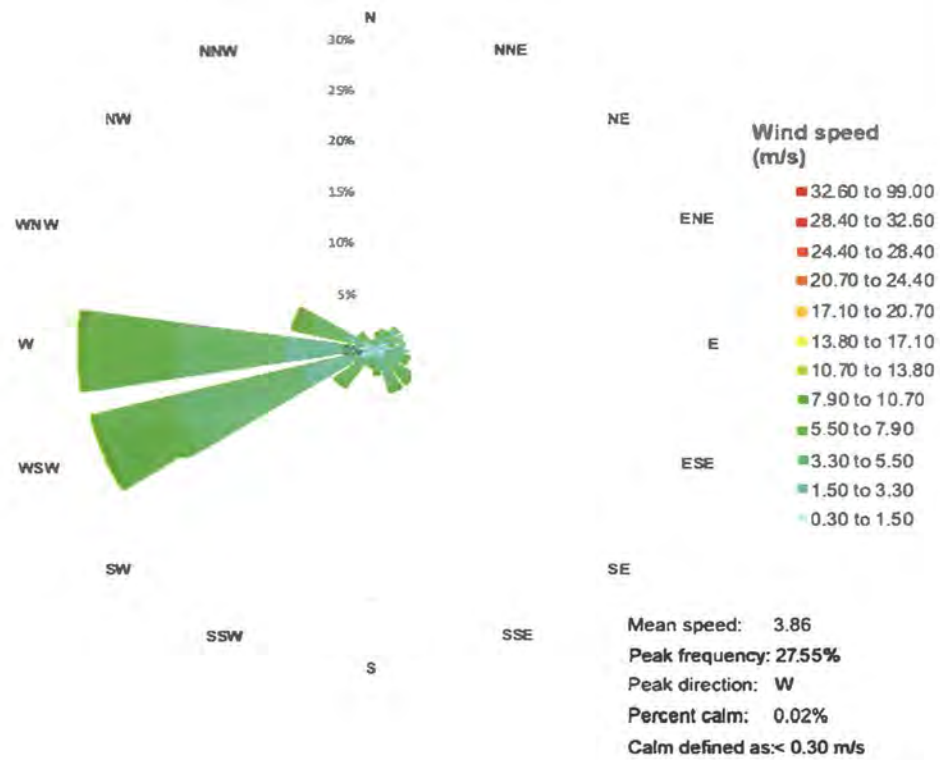


Figure 3 - Site Wind Rose

Figure 4
Site Plan

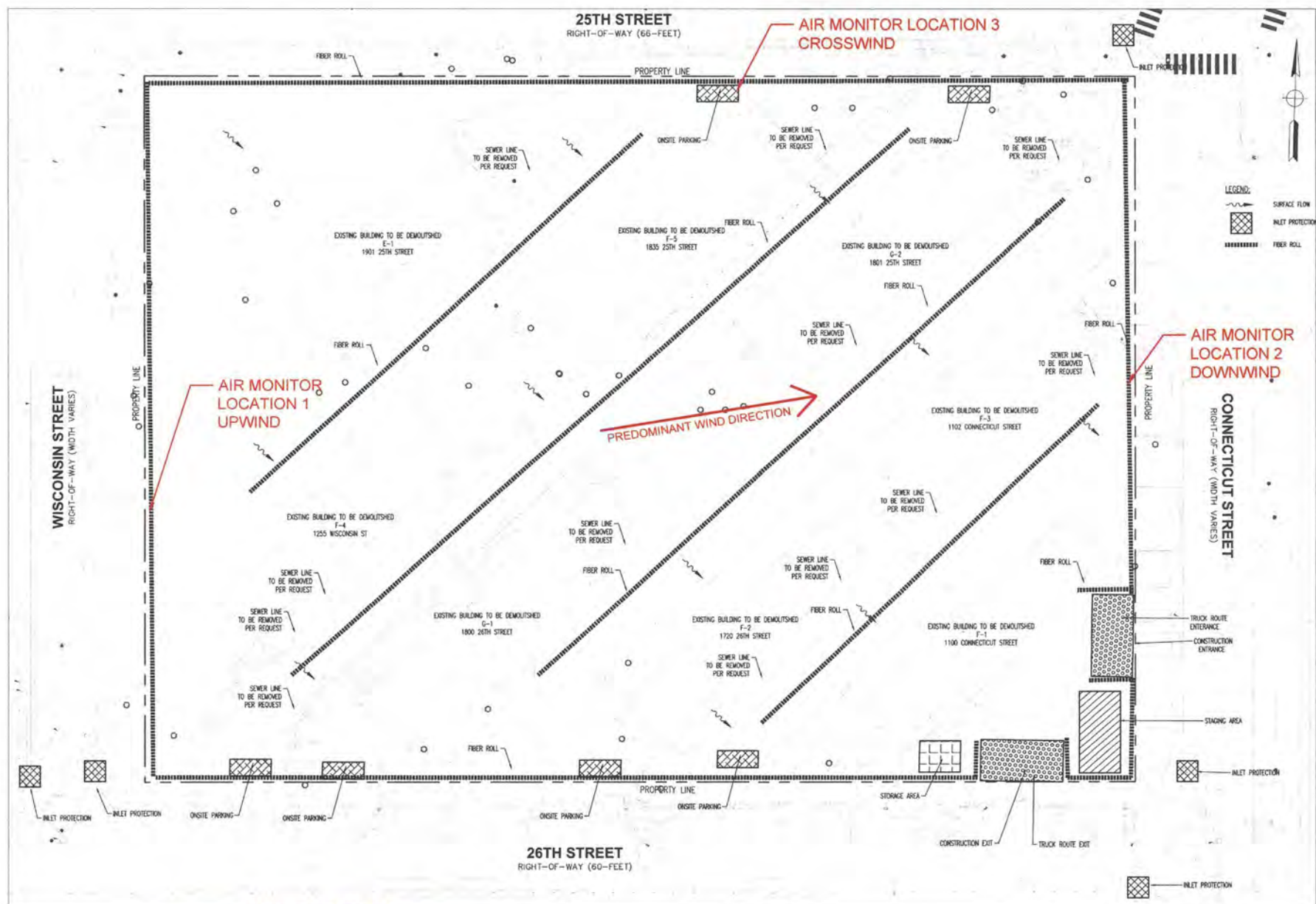


Figure 4 - Site Plan
ADMP - Potrero Hill Hope, Phase 2

1 SITE PLAN
SCALE 1"=20'

Figure 5
Site Plan for Cutting and Capping Water and Gas Mains

Appendix A Asbestos Testing Results



ASBESTOS TEM LABORATORIES, INC.

CARB Method 435 Polarized Light Microscopy Analytical Report

Laboratory Job # 1133-00058

630 Bancroft Way
Berkeley, CA 94710
(510) 704-8930
FAX (510) 704-8429



ASBESTOS TEM LABORATORIES, INC

CA DPH ELAP
Lab No. 1866



NVLAP Lab Code: 101891-0
Berkeley, CA

Nov/10/2015

Brian Flaherty
Engeo Incorporated - San Ramon
2010 Crow Canyon Place, Ste. 250
San Ramon, CA 94583

RE: LABORATORY JOB # 1133-00058
Polarized light microscopy analytical results for 3 bulk sample(s).
Job Site: 8683.000.000
Job No.: Portrero - Block X

Enclosed please find the bulk material analytical results for one or more samples submitted for asbestos analysis. The analyses were performed in accordance with the California Air Resources Board (ARB) Method 435 for the determination of asbestos in serpentine aggregate samples.

Prior to analysis, samples are logged-in and all data pertinent to the sample recorded. The samples are checked for damage or disruption of any chain-of-custody seals. A unique laboratory ID number is assigned to each sample. A hard copy log-in sheet containing all pertinent information concerning the sample is generated. This and all other relevant paper work are kept with the sample throughout the analytical procedures to assure proper analysis.

Sample preparation follows a standard CARB 435 prep method. The entire sample is dried at 135-150 C and then crushed to ~3/8" gravel size using a Bico Chipmunk crusher. If the submitted sample is >1 pint, the sample was split using a 1/2" riffle splitter following ASTM Method C-702-98 to obtain a 1 pint aliquot. The entire 1 pint aliquot, or entire original sample, is then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. If necessary, additional homogenization steps are undertaken using a 3/8" riffle splitter. Small aliquots are collected from throughout the pulverized material to create three separate microscope slide mounts containing the appropriate refractive index oil. The prepared slides are placed under a polarizing light microscope where standard mineralogical techniques are used to analyze the various materials present, including asbestos. If asbestos is identified and of less than 10% concentration by visual area estimate then an additional five sample mounts are prepared. Quantification of asbestos concentration is obtained using the standard CAL ARB Method 435 point count protocol. For samples observed to contain visible asbestos of less than 10% concentration, a point counting technique is used with 50 points counted on each of eight sample mounts for a total of 400 points. The data is then compiled into standard report format and subjected to a thorough quality assurance check before the information is released to the client.

While the CARB 435 method has much to commend it, there are a number of situations where it fails to provide sufficient accuracy to make a definitive determination of the presence/absence of asbestos and/or an accurate count of the asbestos concentration present in a given sample. These problems include, but are not limited to, 1) statistical uncertainty with samples containing <1% asbestos when too few particles are counted, 2) definitive identification and discrimination between various fibrous amphibole minerals such as tremolite/actinolite/hornblende and the "Libby amphiboles" such as tremolite/winchite/richterite/arfvedsonite, and C) small asbestiform fibers which are near or below the resolution limit of the PLM microscope such as those found in various California coast range serpentine bodies. In these cases, further analysis by transmission electron microscopy is recommended to obtain a more accurate result.

Sincerely Yours,

Lab Manager
ASBESTOS TEM LABORATORIES, INC.

--- These results relate only to the samples tested and must not be reproduced, except in full, without the approval of the laboratory. ---

630 BANCROFT WAY • BERKELEY, CA 94710 • PH. (510) 704-8930 • FAX (510) 704-8429

With Branch Offices Located At: 1350 FREEPORT BLVD. UNIT 104, SPARKS, NV 89431

POLARIZED LIGHT MICROSCOPY CARB 435 ANALYTICAL REPORT

Page: 1 of

Contact: Brian Flaherty	Samples Submitted: 3	Report No. 337451
Address: Engeo Incorporated - San Ramon 2010 Crow Canyon Place, Ste. San Ramon, CA 94583	Samples Analyzed: 3	Date Submitted: Nov-05-15
	Job Site / No. Portrero - Block X 8683.000.000	Date Reported: Nov-10-15

SAMPLE ID	POINTS COUNTED	ASBESTOS %	TYPE	LOCATION / DESCRIPTION
1-B1 @ 15'	18	4.50%	Chrysotile	
Lab ID # 1133-00058-001	400 - Total Points			
1-B3 @ 5'	17	4.25%	Chrysotile	
Lab ID # 1133-00058-002	400 - Total Points			
1-B4 @ 3'	22	5.50%	Chrysotile	
Lab ID # 1133-00058-003	400 - Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			
Lab ID #	- Total Points			

QC Reviewer *R. Mc R...*

Analyst *Jo Ann H...*

