

Appendix C – Termination of Project (Letter)



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W. James Wagoner
Air Pollution Control Officer

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January 27, 2020

Kevin Dossey
California Department of Water Resources
Oroville Field Office
1001 Brad Freeman Trail
Oroville, CA 95965

Re: Approval of January 22, 2020 Proposal to Terminate Naturally Occurring Asbestos Air Monitoring for the Oroville Spillway Emergency Recovery Project

Dear Mr. Dossey:

The Butte County Air Quality Management District (District) is contacting the California Department of Water Resources (DWR) in response to the January 22, 2020 letter proposing the termination of the naturally occurring asbestos (NOA) air monitoring program for the Oroville Spillway Emergency Recovery Project (Project). The Project was outlined in the Asbestos Dust Mitigation Plan (September 2017, Revision 3.0) and identified the equipment, recordkeeping and reporting requirements that were to be used to protect public health and the environment from potential exposure to NOA throughout the work that was required to recover and rebuild the spillway and related infrastructure following the damage sustained in February 2017.

Over the duration of the Project, the results of the collection of 17,979 samples were reported to the District, between March 15, 2017 and December 26, 2019. During that time, the vast majority of those samples, 15,184, were non-detect and only 86 samples were reported over the detection limit. As stated in your letter and confirmed by our review of reports, only two samples were reported as over the detection limit in 2019, corresponding to the reduction in construction and grading activities on the site.

As outlined in DWR's letter, the major construction activities have been completed and the only remaining work that may disturb soils on the site is limited to grading of an area that is less than one acre. Please note that dust mitigation requirements of Section 93105 of the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations still apply, however, the District concurs that air monitoring is not warranted at this point in the Project. Should conditions change that affect this finding, the District may require air monitoring in the future. Please continue to include the District in consideration of activities that involve disturbance of soils in the Project area.

Sincerely,

A handwritten signature in black ink, appearing to read "W. James Wagoner".

W. James Wagoner
Air Pollution Control Officer