

February 7, 2022

Attn: Keith Jones
City of Vancouver
P.O. Box 1995
Vancouver WA 98668-1995

RE: HQ Master Plan and Subdivision; PRJ-165963/LUP-81596; SEPA 202200074

Keith Jones:

The Southwest Clean Air Agency (SWCAA) has learned that your agency has issued/will issue a SEPA Determination for the above project. Please be advised that SWCAA administers/enforces a number of regulations that may apply to the proposed project. The applicability of these regulations depends on the exact nature of the project in question. The following sections provide brief summaries of the requirements for the general types of activity that may be affected by this project.

Demolition / Asbestos [SWCAA 476]:

- Prior to **demolition or renovation** of a structure, a thorough asbestos inspection must be conducted by an AHERA-certified inspector in order to determine the presence of asbestos containing material (ACM) in all affected structure(s) or area(s).
A copy of the AHERA asbestos inspection report must be posted for viewing at the project site.

Asbestos Containing Material PRESENT

Asbestos Containing Material NOT PRESENT

If the asbestos inspection reveals ACM to be present in the affected structure(s) or area(s) –

If the asbestos inspection does not reveal ACM to be present in the affected structure(s) or area(s)...

Required documents/reports: (for each structure)

- **Notification of Demolition**
- **Notice of Intent to Remove Asbestos**
- **AHERA asbestos inspection report**

...and the structure is to be demolished –

Required documents/reports:

- **Notification of Demolition**
- **AHERA asbestos inspection report**

There is a 10-calendar day waiting period from the time the notices are submitted before asbestos removal or structure demolition may begin.

There is a 10-calendar day waiting period from the time the notification is submitted before the demolition may begin.

All asbestos must be completely removed from the affected structure(s) or area(s) prior to structure demolition taking place.

...and the project involves only renovation and that renovation does not involve the removal of load bearing walls –

Required documents/reports:

none

ACM must be removed by certified personnel in full accordance with the Southwest Clean Air Agency's Regulations SWCAA 476 (Standards for Asbestos Control) and with 40 CFR Part 61 Subpart M (National Emission Standards for Asbestos).

Construction Dust [SWCAA 400: General Regulations for Air Pollution Sources]:

- Construction and earthmoving activities have the potential to generate excessive dust emissions if reasonable control measures are not implemented. SWCAA Regulation 400-040(2) requires that “no person shall cause or permit the emission of particulate matter from any stationary source to be deposited beyond the property under direct control of the owner or operator of the stationary source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited”. Furthermore,




SWCAA Regulation 400-040(8)(a) requires that “the owner or operator of any source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions”.

- Common control measures to mitigate the emission of dust from construction and earthmoving activities include: application of water before and during earthmoving operations, application of water to disturbed surface areas (including access roads and staging areas) after earthmoving operations, application of chemical dust control products and/or surfactants, limiting access to open/disturbed areas, reducing equipment/vehicle speeds, establishing vegetative cover on inactive areas and ceasing operations altogether during high wind events.
- Violations of SWCAA Regulation 400-040 may result in civil penalties being assessed against the project operator and/or property owner.

The proponent of this project may contact SWCAA at 360-574-3058 for more information regarding the agency’s requirements. Notification forms, permit applications, air quality regulations and other information are available on the internet at <https://www.swcleanair.gov>.

Sincerely,

A handwritten signature in black ink, appearing to read 'Duane Van Johnson', with a stylized flourish extending to the right.

Duane Van Johnson
Air Quality Specialist II