



County of Tuolumne

Agricultural Commissioner • Weights & Measures
• Air Pollution Control

*Agricultural Commissioner
Sealer of Weights & Measures
Air Pollution Control Officer*

September 22, 2025

Tuolumne County Community Development Department
2 South Green Street
Sonora, CA 95370

**RE: Tuolumne County Air Pollution Control District (District) Comments – TCU
Lightning Complex Fire Clean-up**

To Whom it May Concern,

The Tuolumne County Air Pollution Control District (District) is providing the following comments for all contractors participating in the clean-up and removal of debris and asbestos-containing material (ACM) from the TCU September Lightning Complex Fire:

1. Any construction or site activities that create fugitive dust emissions shall implement dust suppression methods using either water or chemical stabilizer/suppressants. A water truck or other dust suppression equipment shall be on site at all times. The frequency of dust suppression measures shall be dependent on whether visible dust emissions are present. (TCAPCD Rule 505 - *Conditional Approval*)
2. Should serpentine or ultramafic rock be found on site, a Dust Mitigation Plan pursuant to Air District Rule 908 - *Asbestos ATCM*, shall be submitted to the Air District prior to any building or site work. (TCAPCD ATCM 908 - *Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations*)
3. Any construction activities, road construction, road maintenance, or grading that disturbs naturally occurring asbestos, serpentine, or ultramafic rock shall be subject to TCAPCD Rules and Regulations, Regulation IX, Rule 908 unless specifically exempted under Sections (C) or (D) (3). All dust mitigation requirements shall be implemented and maintained throughout the duration of the construction or grading activity.
 - a. Requirements for Road Construction and Road Maintenance Activities:
 - i. Equipment and operations must not cause any visible dust crossing project boundaries;
 - ii. Unpaved roads, area subject to vehicle traffic, storage piles, and disturbed areas shall be kept adequately wetted, treated with dust suppressants, or covered with material that contains less than 0.25% asbestos;

- iii. Construction vehicle speeds shall be limited to 15 mph; and
 - iv. Track out from any road construction project is prohibited on any paved public roadway.
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- 4. Exposed serpentine gravel is prohibited on the project site, unless exempted pursuant to TCAPCD Rules and Regulations, Regulation IX, Rule 904 Section (F) or Rule 908 Section (C) or (D)(3). No person shall use, apply, sell, supply, or offer for sale or supply any restricted material (as defined in subsection (I)(20) of Rule 904) for surfacing, unless it has been tested and determined to have an asbestos content that is less than 0.25 percent. Any roadway including road shoulders or any surface that is subject to vehicular travel or pedestrian access must be completely covered with non-restricted material. (*California Health and Safety Code, Sections 93105 and 93106*)
 - 5. Any aggregate rock used for surfacing material that contains greater than 0.25% asbestos shall be incorporated into or completely covered by asphalt concrete, Portland cement concrete, or other similarly cemented material. (TCAPCD ATCM 904 - *Asbestos ATCM for Surfacing Applications*)
 - 6. Existing county or State paved roads and streets adjacent to the construction site shall be cleaned as necessary to limit track out and prevent fugitive dust. (TCAPCD Rule 505 - *Conditional Approval*)
 - 7. Open burning of vegetation for land clearing purposes shall be prohibited without a valid burn permit from the District. (TCAPCD Rule 310.2(A) - *Land Development Clearing*)
 - 8. CARB mobile equipment regulations shall be adhered to for all diesel fired mobile sources used at this site during construction. (CCR Title 13 Section 2449 et al)
 - 9. Any diesel fired portable equipment used at this site during construction shall comply with the *ATCM for Diesel PM from Portable Engines Rated at 50 BHP or Greater*. (CCR Title 17 Section 93116)

If you have any questions or need additional information, please call me at (209) 533-6678 or email to krasmussen@co.tuolumne.ca.us.

Sincerely,

Kent Rasmussen
Air Pollution Control Specialist

c. Cody Thompson, Air Pollution Control Officer

