



City of Palo Alto Fire Prevention Bureau Haz-Mat Division Closure Plan Submittal Requirements



GENERAL:

1. Hazardous Materials Closure Plans shall be submitted to PAFD for review, no less than 45 days before planned closure. Some closures will take longer.
2. Submit a site plan. Site plan shall be legible, scaled to nationally recognized standards, and blue or black lined.
3. Submit completed copy of the PAFD Permit Application for the Hazardous Materials Closure Plan, which can be obtained at <https://www.cityofpaloalto.org/gov/depts/ds/fire.asp>.
4. Submit appropriate Hazmat Closure fees. If closure takes over 2 hours to complete, additional fees will be applied.
5. Hazardous Materials Closure Plan is required for Facilities that handle, use and/or store hazardous materials in the City of Palo Alto.
6. Submit a cover letter that includes the following information:
 - The scope of the Hazardous Materials Closure Plan.
 - A desired timeline for the closure.
 - Describe the disposition of any hazardous materials or waste on site (intended reuse, shipped offsite or other method of disposal).

If materials will be shipped offsite provide the following:

- a. Name of the Hazardous Waste Hauler;
 - b. Hazardous Waste Hauler's State Permit Number.
 - c. Hazardous Waste Hauler's phone number.
- If another method of disposal was used for the disposal of hazardous material or waste, provide a description of the method used.
 - If you intend to conduct environmental sampling (the Fire Department may require samples to be taken as a result of the site review inspection), provide the following information:
 - a. Name of the firm that will take the samples and their phone number.
 - b. Name of the California Environmental Protection Agency Certified Laboratory that will analyze the samples and their phone number.
 - If you intend to submit this closure plan to another agency, submit the following for each agency:
 - a. Name of Agency;

- b. Address;
 - c. Contact person's name and phone number.
7. Submittals may be emailed to Palo Alto Fire Department, at fire@cityofpaloalto.org. All fees must be paid at the time of plan submittal.
 8. Hazardous Material Closure Plans not conforming to these minimum requirements will be returned as incomplete and will delay the approval process.

CLOSURE PROCEDURES

1. At the time of application, a Site Review Inspection will be scheduled. The pre-removal of ANY material and or equipment before inspection will result in double fees.
2. See plan review comments for additional inspection requirements. The closure plan will not receive final approval until all requirements have been completed.
3. Hazardous materials piping shall be removed. Prior to removal, underground product piping shall be tested to determine piping integrity. Testing methods shall conform to the Uniform Plumbing Code or be approved in advance by the Fire Marshal, (e.g., 24-hour hydrostatic test, air pressure test, etc.)
 - If integrity testing is not performed, then soil samples shall be taken at 20-foot intervals along the length of piping. For long pipe runs, where there is no sign of contamination, up to three separate samples may be composited.
4. Verify that all tanks, vessels, process equipment, piping, etc., are emptied of product and vapors prior to removal. Provide proof of proper disposal.
5. Surface, soil or groundwater samples are often required. Justification shall be submitted with the closure plan to support requests to not take these samples.
6. When samples are required, a report shall be submitted to the Fire Department prior to closure that includes:
 - Copies of laboratory test results from a certified lab. Provide level of detection and State limits listed as acceptable by California EPA.
 - Sample locations and depths on a site plan.
 - Sample collection and handling procedures.
 - Laboratory test procedures used, including appropriate quality control/quality assurance data.
 - Any comments concerning contamination of the site.
 - **Completed** chain of custody form.
7. Submit appropriate amendments to the Hazardous Materials Business Plan, if applicable.
8. If contamination of the soil or groundwater is present, a remedial action report shall be submitted to the Santa Clara County Health Department, Regional Water Quality Control Board or California EPA, as appropriate, with a projected completion date.
9. A new owner or operator of the property may take responsibility for hazardous materials and equipment being transferred as long as the necessary knowledge, resources, a plan of action and a letter signed by the new owner or operator accepting responsibility for the hazardous materials

are presented to the Fire Department before transfer.

10. Confirmation of compliance to all items in the approved closure plan shall be presented before closure plan receives final approval. Include laboratory results, manifests, bills of sale (for equipment and virgin chemicals), etc.

SCHEDULING INSPECTIONS

1. Inspection appointments can only be made by the permit applicant or listed contractor.
2. It is the responsibility of the permit applicant or listed contractor to have a representative on the job site during the inspection with a set of approved plans. Failure to do so will result in the cancellation of the inspection and an assessment of a re-inspection fee will be assessed.
3. Email fire@cityofpaloalto.org at least 5 business days prior to the desired date of the inspection. Inspections are assigned on a first come first served basis.

APPROVAL OF HAZARDOUS MATERIALS CLOSURE PLANS

Hazardous Material Closure Plans will only be deemed approved after all work prescribed by the Palo Alto Fire Department is satisfactorily completed and the permit card is signed or signed off online. Approval will only be granted after a review of all analyses done on samples that are taken as part of the closure plan.

