HAZMAT STORAGE FACILITY CLOSURE GUIDELINES

Closure Plan summary

The information in the Facility Closure Notification and Closure Plan must be consistent with information presented in the Hazardous Materials Inventory Statement (HMIS) on file with the Fremont Fire Department (FFD). A Closure Plan approved by the FFD is required if any Hazardous Materials Facility, or any storage area therein, is to be closed. The plan shall be submitted by the facility manager or owner, or the property owner.

The Closure Plan must be submitted to FFD no less than 30 days prior to the termination of the storage of hazardous materials at the storage facility for currently operating facilities. The information in the closure plan shall describe procedures for terminating the storage of hazardous materials in each storage facility in a manner that:

1. Demonstrates that the hazardous materials used or stored at the facility will be removed, disposed of, or reused in an appropriate manner; and

2. Threat to public health or safety or to the environment from residual hazardous materials in the storage facility is eliminated or minimized to the extent; and

3. Eliminates or minimizes the need for further maintenance or monitoring.

Hazardous or potentially hazardous materials including, but not limited to, chemicals, tanks, vats, and process equipment, are NOT to be removed from the site until the closure plan has been submitted and approved, or FFD has approved limited removal of equipment for sale or transfer purposes. All equipment shall be identified and inspected prior to removal.

Additional Permits and Approvals

If underground storage tanks (UST) are being closed, a separate UST closure plan must also be submitted and approved, and a permit issued before this work may commence. Local building department permits are likely required for some types of demolition work. Closure of groundwater or vadose wells will also require a permit from the local well-permitting agency, the Alameda County Water District (ACWD).

Closure Plan elements

1. A completed Closure Notification form and accompanying deposit.

2. General site and facility maps/diagrams.

3. A site history describing all past and current chemical usage and/or storage of hazardous materials/wastes. A diagram must be provided showing past uses for each room/building/area and listing all chemicals which have at some time been located in each area.

4. A history of all soils and/or groundwater sampling which has been performed at the site.

5. A summary of all facilities to be closed including (as applicable):

    a. Identification of fixed equipment and buildings
    b. Listing of chemicals

c. Fume exhaust systems, including fans, scrubbers, ducting locations, type of input
d. Process water or wastewater sanitary sewers, including pipeline locations, type of input, clean-outs, vents and inlets and sampling locations
e. Contaminated or potentially contaminated equipment, including piping, vats, tankage and process vessels
f. Areas such as walls, ground surfaces, floors, etc. of potential or known contamination and/or corrosion

6. A description of the analytical testing that will be used to decide if materials/residues are classified hazardous waste or a potential contamination problem. All wastes are to be classified. This includes residues, equipment, piping and in some cases building walls, floors and other structural elements. The test procedures and their specifications shall be indicated. The final closure report must include or reference all specific procedures including analytical results.

7. A statement that all receipts for hazardous waste disposal and/or hazardous materials sales will be kept and made available for inspection and will be included in the final closure report. An index identifying which chemicals or pieces of equipment are associated with receipts must be included in the final closure report if identification is not clear from the receipts.

8. A description of how many soil, groundwater or other required samples would be collected handled, and analyzed to determine if there are any residual impacts to the site due to past facility activities. A certified lab must be used for the analysis of all samples. Include a statement that the environmental assessment work will be overseen by a State-certified geologist or State-registered civil engineer, and will "sign-off" on all soils or groundwater sampling. Indicate the name, address and phone number of the sampler, environmental firm and laboratories used.

9. A description of specific steps which will be taken with respect to all items/areas identified as hazardous, or potentially hazardous or contaminated, to either remove, dispose of, neutralize or reuse them if they have already been characterized, or what steps will be taken to characterize them if they have not yet been characterized. Include who will be responsible for the disposal, removal, and treatment or cleaning of the items/areas.

10. Certification that disposal of hazardous wastes will meet all Federal and California EPA requirements.

11. A site safety and spill contingency plan, scaled to the closure activities, shall also be included.

Post Closure Report

A final closure report must be submitted to the FFD within 30 days of completion of work outlined in the closure plan. This closure report shall document actions actually taken to close the facility or parts therein, and shall include receipts (e.g., manifests, bills-of-lading, etc.) for chemical, waste and equipment disposal/transport. The report shall present the results of any soil or water sampling that may have occurred. The report signer shall certify that the approved facility closure has been completed.

For partial facility closures, a revised HMBP for the facility shall also be submitted.